



Cabinet Office

Windsor Framework Taskforce
70 Whitehall
London
SW1A 2AS

E wftf-sg@cabinetoffice.gov.uk

cabinetoffice.gov.uk

██████████
Senior Assistant Clerk, Windsor Framework Democratic Scrutiny Committee
Room 382, Parliament Buildings
Stormont
Belfast, BT4 3XX

28 October 2025

Dear ██████████

COM(2025)531 - Proposal for a Regulation of the European Parliament and of the Council amending Regulations (EC) No 1272/2008, (EC) No 1223/2009 and (EU) 2019/1009 as regards simplification of certain requirements and procedures for chemical products

Thank you for your letter dated 18 September 2025.

As set out in the corresponding Explanatory Memorandum (EM), it is proposed that European Union Classification, Labelling and Packaging (EU CLP) suppliers will be required to include a digital contact in place of a telephone number on their product labels.

Your letter sought clarification of the following point made in the EM submitted to the Committee on 26 August on the impacts of the proposed digital contact requirement: “the ramifications of this divergence are nullified for GB-based suppliers to NI by the incoming requirement for chemicals being placed on the EU and NI markets to have an EU/NI-based supplier reflected on the label which will apply from 1 July 2026 and necessitate changes to the contact details of the supplier on the label.” To clarify, the Government’s view is that GB-based suppliers will already need to make adjustments to the supplier contact details on the label of relevant products as a result of the updates to EU CLP. Therefore the requirement in the simplification proposals, to provide a digital contact point rather than a telephone number, can be addressed by suppliers at the same time, and in doing so mitigate additional burdens.

The UK Government does not expect any adverse impacts on the movement of chemical goods from NI to GB to result from the proposed digital contact requirement. In line with the UK Government’s commitment to ensuring NI-based businesses have unfettered access to the rest of the UK Internal Market and to prevent impediment in the movement of chemicals as qualifying NI goods from NI to GB, chemical goods meeting NI standards can be sold anywhere in the UK Internal Market.

I hope that this letter will provide the Committee with the clarification it seeks.



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Yours sincerely,

PAUL FLYNN

DEPUTY DIRECTOR - WINDSOR FRAMEWORK TASKFORCE



██████████, Senior Assistant Clerk
Windsor Framework Democratic Scrutiny
Committee (DSC)

Ref: DSC 195/25
18 September 2025

██████████
Windsor Framework Taskforce – Cabinet Office
Issued via email to: ██████████

Dear ██████████,

COM/2025/531 Proposal for a Regulation of the European Parliament and of the Council amending Regulations (EC) No 1272/2008, (EC) No 1223/2009 and (EU) 2019/1009 as regards simplification of certain requirements and procedures for chemical products

At its meeting on 18 September 2025, the Windsor Framework Democratic Scrutiny Committee (DSC) considered the above proposed EU act, which was notified to the Committee on 17 July 2025. The Committee heard oral evidence from the Department for the Economy; the Department of Agriculture, Environment, and Rural Affairs; and the Department of Justice.

During the evidence session, it was noted that the [UK Government Explanatory Memorandum](#) comments on divergence between EU and GB chemical labelling rules and states, *“the ramifications of this divergence are nullified for GB-based suppliers to NI by the incoming requirement for chemicals being placed on the EU and NI markets to have an EU/NI-based supplier reflected on the label which will apply from 1 July 2026 and necessitate changes to the contact details of the supplier on the label.”*

The Committee agreed to request more information on these requirements.

I would appreciate a response by 17 October 2025.

Yours sincerely,

██████████

██████████, Senior Assistant Clerk
Windsor Framework Democratic Scrutiny Committee