

PROPOSED REPLACEMENT EU ACT INITIAL ASSESSMENT OF IMPACT

Date: 8/9/25

DSC REF: DSC/17a/2025 - Chemical Products - COM(2025)531

Proposed Replacement EU Act

[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.](#)

Amending:

[Regulation \(EC\) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation \(EC\) No 1907/2006](#)

[Regulation \(EC\) No 1223/2009 of the European Parliament and of the Council of 30 November 2009 on cosmetic products](#)

[Regulation \(EU\) 2019/1009 of the European Parliament and of the Council of 5 June 2019 laying down rules on the making available on the market of EU fertilising products and amending Regulations \(EC\) No 1069/2009 and \(EC\) No 1107/2009 and repealing Regulation \(EC\) No 2003/2003](#)

Windsor Framework Annex 2, Heading 23 (Chemicals and related) and Heading 17 (Cosmetics, toys).

Summary of the Act

The three regulations in scope all concern the supply of chemicals to the EU Single Market. The regulations relating to cosmetic and fertilising products are outside the Department of Justice's (DoJ) remit.

The CLP regulation imposes requirements on manufacturers, importers, downstream users and distributors to identify and communicate the hazards of their chemicals in accordance with an internationally agreed system, the United Nations' Globally Harmonized System of classification and labelling. General

requirements of CLP also include supplier obligations concerning the safe and secure packaging of chemicals.

The proposed amendments are part of a wider simplification package adopted by the European Commission on 8 July 2025 which aims to boost the EU's competitiveness and seek to simplify and streamline requirements and procedures of CLP in order to reduce compliance costs and administrative burden for the chemical industry.

Changes to be brought in by the Proposed CLP Regulation

Regulation (EU) 2024/2865 imposed a series of new requirements on suppliers concerning hazard identification and communication in order to provide more comprehensive identification and classification of chemical hazards, improve hazard communication by making labels more accessible and understandable and address legal gaps and ambiguities.

The proposal either reverses or further clarifies certain labelling and other hazard communication provisions introduced by Regulation (EU) 2024/2865:

- Mandatory labelling rules regarding minimum font size and colour, background colour and line and letter spacing are removed.
- The 6-month deadline within which suppliers must update their product labels following a change of classification or labelling that results in the addition of a new hazard class, in a more severe classification or new supplemental information is removed. Instead, labels must be updated 'without undue delay' once new data is obtained or communicated to the supplier.
- Requirements to reflect the applicable hazard pictograms, signal words, hazard statements and obligatory supplemental statements in advertisements are removed and the scope of advertisements and distance (online) sales requirements is reduced to the general public so as to exclude professional transactions from these obligations.
- Labelling rules applicable to fuelling stations are relaxed through removal of the requirement to include the following label elements on fuel pumps: name and contact details of supplier, nominal quantity of the supplied chemical and Unique Formula Identifier number.
- Derogations from labelling requirements for chemicals in very small packaging under 10 ml are clarified to ensure their applicability without the need to first prove that the packaging is either in such a shape or form or is so small that it is impossible to meet full labelling requirements.

Provisions of CLP that incorporate digital technologies are further developed by replacing the need for suppliers to provide their telephone number on labels with

the mandatory requirement to include a 'digital contact'—any up-to-date and accessible online communication channel through which economic operators can be reached or engaged.

Department(s) Responsible

The Department for the Economy (DfE) and the DoJ share joint competence for CLP. DoJ's remit only extends to explosives for civil uses.

Initial Assessment of Impact

It does not appear likely that the application of the proposed replacement EU act would have a significant impact specific to everyday life of communities in Northern Ireland (NI) in a way that is liable to persist. The proposals seek to simplify and streamline requirements and procedures of CLP in order to reduce compliance costs and administrative burden for the chemical industry while aiming to ensure the strong protection of human health and environment.

It does appear likely that not applying the proposed replacement EU act would have a significant impact specific to everyday life of communities in NI in a way that is liable to persist. NI would be unable to benefit from the simplification and would seek to comply with measures no longer in effect.

UK Government Explanatory Memorandum – attached at Annex A

A UK Government Explanatory Memorandum (EM) was published on 26 August 2025. The EM outlines the scope of the CLP regulation and its application in NI and concludes that there are no legal implications arising from the proposal. The UK government will monitor the passage of the proposals through the EU negotiation process and assess any possible impacts by the date of application.

The CLP regulation concerns the supply of chemicals to the EU Single Market.

- Regulation (EC) No 1272/2008 on the classification, labelling and packaging of substances and mixtures ('European Union the Classification, Labelling and Packaging Regulation; EU CLP'). The Regulation imposes requirements on manufacturers, importers, downstream users and distributors to identify and communicate the hazards of their chemicals in accordance with an internationally agreed system, the United Nations' Globally Harmonized System of classification and labelling. General requirements of CLP also include supplier obligations concerning the safe and secure packaging of chemicals.

The proposals seek to simplify and streamline requirements and procedures of EU CLP in order to reduce compliance costs and administrative burden for the chemical industry while aiming to ensure the strong protection of human health and environment.

The proposed amendments are part of a wider simplification package adopted by the European Commission on 8 July 2025 which aims to boost the EU's competitiveness.

Following the UK's withdrawal from the EU, CLP was assimilated into GB law and operates separately to the corresponding EU regime. As such, the amendments proposed will not apply to the regulation of chemicals CLP in GB.

Analysis by the European Commission on its Impact Assessment

Given the need to urgently put forward a proposal to address the identified problems in order to reduce administrative burden and excessive costs for businesses it was not possible to prepare a full impact assessment. The EU's explanatory memorandum is attached at Annex B.

However, following better regulation principles, this proposal is accompanied by a Commission staff working document that includes an analysis of the impacts of the proposed measures, based on existing data and information gathered during the various Reality Checks, written input received from stakeholders and previous analyses, such as the Fitness Check of the most relevant chemicals legislation, the impact assessments on fertilising products and for the CLP revision, and the evaluation of the Detergents Regulation.

In preparation of the proposal, the Commission consulted stakeholders in three Reality Checks, one for each Regulation to be amended, and invited participants to send written feedback after these meetings. Furthermore, various suggestions for simplifying or clarifying certain provisions of chemical legislation and removing the excessive administrative burden stemming from these provisions have emerged through stakeholders' proposals for simplification of European chemical legislation and numerous position papers received before and after the Reality Checks.

Departmental Engagement

Officials in DoJ were consulted during the preparation of the UKG EM for the proposal.