EUROPEAN COMMISSION
Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs

Ecosystems I: Chemicals, Food, Retail
F2. Bioeconomy, Chemicals & Cosmetics

MEETING MINUTES

REALITY CHECK WORKSHOP
ON THE POSSIBLE SIMPLIFICATION OF CHEMICALS LEGISLATION – CLP (CLASSIFICATION, LABELLING AND PACKAGING OF SUBSTANCES AND MIXTURES)

FRIDAY 16 MAY 2025, 9.00 – 12:30

Location: Online (Webex);

Organised by: European Commission – Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs, Unit F2;

Participants: Representatives from the Commission, businesses, practitioners applying EU law, consumer and business associations, competent authorities (*464 connected participants in total*).

I. Welcoming Remarks and Introduction to the Commission Simplification Initiatives

The workshop opened with an introduction to the Commission's policy on simplification and its new technical-level consultation tool, the "Reality Check." The objective was to collect feedback of stakeholders (businesses, practitioners applying EU law, consumer and business associations as well as competent authorities) on potential simplification of the Classification, Labelling and Packaging Regulation (CLP) following its revision via Regulation (EU) 2024/2865, with the aim for cost-savings and reduction of the administrative burdens. The context was the Commission's broader simplification strategy to enhance EU competitiveness through streamlined legislation.

II. Mandatory Formatting Requirements

A significant majority of participants expressed concern about the mandatory formatting requirements, especially minimum font sizes, line spacing, and black-on-white text obligations. Stakeholders highlighted the disproportionate economic burden these rules place on businesses, particularly in multilingual markets, and raised concerns about increased packaging waste, limited label space, and the high cost of fold-out labels. Numerous participants supported the use of digital tools (e.g. QR codes) as a supplementary or alternative means of conveying information. Others noted that the one-size-fits-all approach did not account for the

diverse professional contexts (e.g. B2B transactions) where hazard communication is already ensured through Safety Data Sheets (SDS). There was strong and repeated support for "stopping the clock" on the new formatting requirements to allow for further analysis and adaptation. At the same time the concerns about the need to protect consumers and workers and ensure legibility of labels and provide clear and comprehensive hazard information were also raised.

III. Rules on Advertisements

Many participants criticised the broadened requirements for advertisements introduced in the revised CLP, particularly the obligation to include detailed hazard information (e.g. pictograms, signal words and hazard statements) in all promotional material. Stakeholders considered this approach disproportionate, especially in comparison to advertising rules in sectors like pharmaceuticals. Concerns were raised about practical feasibility in modern digital formats (e.g. online banners, small-space media) and the risk of overwhelming consumers with excessive detail, thereby reducing the clarity of key safety messages. The majority supported replacing the new requirements with a simplified standard message such as "Always follow the information on the product label." Several participants advocated exempting B2B advertisements from these requirements entirely, citing the adequacy of SDS for professional users.

IV. Other Areas for Simplification in CLP Regulation

Stakeholders raised a broad range of additional simplification opportunities. Key topics included:

- **Placing vs. making available on the market**: Calls were made to align CLP with other NLF product legislation by distinguishing these concepts, to reduce unnecessary stock reclassification.

- **Poison Centre Notifications (PCN)**: Numerous participants described the current system as burdensome and fragmented, with inconsistent national requirements and high associated costs. Centralisation via ECHA was proposed.

- **Unique Formula Identifier (UFI)**: Several actors requested flexibility in UFI requirements, particularly for fuels, where the diversity and mixing of supplies makes practical implementation extremely difficult.

- **Self-classification labelling deadlines**: Strong support emerged for aligning the six-month deadline for self-classified substances with the 18-month timeline used for harmonised classifications.

- **Digitalisation**: Many stakeholders advocated expanding the legal basis for digital labelling, especially in B2B and multilingual contexts, to complement or partially replace on-pack information.

- **Harmonised Classification and Labelling (CLH)**: Industry and NGO representatives agreed on the need to streamline the CLH process. Proposals included allowing better use of new data, clarifying exposure routes, and automatically updating Annex VI based on scientific opinions.

- **Mixture classification and expert judgment**: Particularly for detergents, stakeholders warned that limitations on the use of expert judgment and weight-of-evidence approaches could lead to disproportionate and misleading classifications.

- **Label updates and stock management**: Several stakeholders noted that short implementation timelines could lead to product and label waste, undermining the Green Deal and packaging legislation.

- **Terminology clarity**: Calls were made to better define "advertisement" and "distance sales" in the CLP to avoid compliance ambiguities.

V. Conclusions

- The new formatting requirements, particularly font sizes and line spacing, were considered excessively burdensome by a wide range of stakeholders. Many called for a pause in their implementation and proposed a more flexible, digitally enabled approach.

- The revised rules on advertisements were widely criticised for being disproportionate and lacking clarity. A simplified approach focusing on referencing the product label was strongly supported.

- Multiple suggestions were made for further simplification of the CLP Regulation, including aligning timelines, clarifying key definitions, streamlining the CLH and PCN processes, and enhancing digitalisation.

- Stakeholders were invited to submit written contributions by 31 May 2025 (or 1 June at the latest), particularly with quantifiable evidence to support simplification proposals.

- The Commission will prepare a report to inform political decision-making.