



Brussels, 20 May 2025

FEICA comments after the CLP reality workshop

Stop the clock

We propose that the European Commission temporarily **pauses the implementation process** of the revised CLP Regulation.

This request comes in light of several critical factors that are currently converging:

- the transition periods for the new rules are approaching rapidly;
- ECHA is still in the process of developing essential guidance documents to support implementation; and
- many companies have already started to invest significant resources in order to comply with the new legal obligations.

At the same time, discussions are ongoing about a potential **simplification of the CLP framework**, which could result in important changes to the current approach. If such simplifications were to be introduced, they might significantly affect the content and structure of the rules that companies are now trying to implement. Proceeding with implementation under these circumstances creates uncertainty and increases the risk of unnecessary or misdirected investments by industry.

Therefore, until the scope and implications of the possible simplification are fully defined, we recommend that the Commission take a **precautionary approach** and **temporarily suspend the implementation timeline**. This would allow all stakeholders to work with greater clarity and avoid a situation where companies are forced to spend resources complying with requirements that may soon be revised.

Formatting rules

The new requirements for font size, printing in black on a white background and other new formatting rules are proving particularly burdensome for our industry, impacting product packages of all capacities.

The issue is exacerbated for products requiring multi-language labels, particularly in multilingual regions such as Belgium and Finland.

These changes necessitate substantial investments in new labelling technologies and will require significant time to test and implement effectively.

We believe that the requirements can be simplified without compromising the worker, consumer, and environmental safety.

See Annex 1 with cost information about relabelling to comply with new formatting rules by the Swedish Association of Chemical Products Suppliers is an association of five industry organizations.

Our suggestion: Removing mandatory formatting and minimum font sizes and reverting to the previous rules, while reinforcing guidance.

Advertisement

The recent CLP revisions have introduced advertising provisions that are significantly more stringent than those applied to other sectors, including pharmaceuticals.

These provisions are particularly problematic in the digital advertising space, where the limited space of mobile and online ads complicates the inclusion of additional images and text.

We urge a reconsideration of these provisions on advertising, recognising that the current guidelines are insufficient to address the practical challenges faced by the industry.

Our suggestion:

- Advertisements of mixtures classified as hazardous or covered by Article 25(6) for sale to the general public shall state: "Always follow the information on the product label."
- Hazard pictograms, signal words, hazard statements and supplemental EUH statements set out in Annex II not required in advertisements.

Keeping a sequential timeline for label updates

During the reality check workshop of 16 May 2025, some companies have expressed a preference for an 18-month transition period for all label updates.

We believe that a 6-month period is too short to manage all the necessary steps, including updates and substitution work, within such a limited timeframe.

However, we think it's important that implementation deadlines for regulatory changes that depend on upstream actors be applied sequentially. This would ensure greater fairness among stakeholders, who would then have equivalent timeframes to comply.

It's also important to distinguish between voluntary updates to classifications and updates triggered by _____ on _____ ATP: While ATP-based changes have a common timeline for all stakeholders, voluntary classification changes are initially known only to the supplier. Downstream users only become aware that a label update is required once they receive the updated classification from the supplier.

If a common transition period of 18 months is applied to all actors, there is a risk that suppliers will use most of this period to comply, leaving only a few months for downstream users to update their own labels.

Our suggestion:

- Regarding Article 30 and update of labels after a change of classification or labelling, we believe that it is key to keep a deadline by operator.

Poison Centre Notification (PCN)

Companies placing mixtures containing hazardous substances on the market must submit Poison Centre Notification (PCN) dossiers. This requirement places a substantial administrative burden,

particularly as formulations often change and dossiers must be submitted in the official language of the country of sale, unless a Member State permits otherwise. This is especially challenging for small and medium-sized enterprises (SMEs), which may lack dedicated compliance teams or access to automated digital solutions. Additionally, Member States are currently allowed to charge national fees for the submission of PCN dossiers.

Our suggestion:

- Revising Annex VIII of the CLP Regulation to allow PCN dossiers submitted in English to be accepted across all EU Member States.
- Undertaking evidence-based review, using poison centre incident data and toxicological profiles, to identify product categories with consistently low acute poisoning risks and limited added value from detailed PCN information.
- Preventing Member states from charging national fees for submissions made via the harmonised ECHA portal, to ensure the system remains free of unnecessary financial barriers and aligned with the principles of the single market.

Contact

FEICA Regulatory Affairs:

Paula Diaz (p.diaz@feica.eu)

FEICA is registered in the **EU Transparency Register** with ID no. **51642763262-89**

FEICA - Association of the European Adhesive & Sealant Industry
Rue Belliard 40 box 10, 1040 Brussels, Belgium
Tel: +32 (0)2 896 96 00
info@feica.eu | www.feica.eu

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Annex 1

Cost information about relabelling to comply with new formatting rules by the Swedish Association of Chemical Products Suppliers is an association of five industry organizations.

The revision of CLP as published in October 2024 introduces a minimum font size, a minimum distance between lines and the text should be without serifs. In practice, all labels for chemical products needs to be redesigned to follow the formatting requirements by 1st Jan 2027. We believe the cost of this revision greatly outweighs the benefits. The regulation already states that the text should be readable – a recommendation of a minimum font-size is already in the guidance. To achieve simplification and protect the competitiveness of the European industry the detailed formatting rules for the text should be deleted from the revised CLP Annex I.

The increased cost will hit companies that take note to be compliant. At the same time enforcement has shown that a significant number of companies are not even following the current labelling requirement. They will not have the additional cost as described below.

What is the cost of the revised formatting rules?

KTF have 75 members active on the Swedish market in formulating chemical products covered by CLP such as cleaning products, paint and adhesives. More than 90% of our members are SMEs.13 of our members has provided detailed feedback.

In the Chemicals Fitness Check from 2017 the estimated that the average cost of redesigning and modifying labels from the Dangerous Preparation Directive to be compliant with CLP was €388 per substance and €475 per mixture.¹ This was a one-time cost.

Cost of redesigning and modifying labels from DSD to CLP (according to report from 2017)				
average cost per product	€388 per substance	€475 per mixture.		
Number of products on the EU-market ²	99 266 substances	352 500 mixtures		
Total cost:	39 million Euros	167 million Euros	Total:	206 million Euros

The feedback from our member show that the estimated average cost of this revision is €1290 (ranging between €184 and €4565) per mixture. More than half of this are **reoccurring cost** because of the cost of fold-out labels and SKUs.

Cost of redesigning and modifying labels to the 2024 CLP revision (according to our assessment)				
Average cost per product	€1290 per substance	€1290 per mixture	The same cost is used for substances as there	

¹ Source: Study on the regulatory fitness of the legislative framework governing the risk management of chemicals (excluding REACH), in particular the CLP Regulation and related legislation, 2017 Annex II p. 72.

² Source: Study on the regulatory fitness of the legislative framework governing the risk management of chemicals (excluding REACH), in particular the CLP Regulation and related legislation, 2017 Annex II p. 69.

			is no difference in workload or cost.
Number of products on the EU-market	99 266 substances	352 500 mixtures	Same figures are used as above
Total cost:	128 million Euros	455 million Euros	Total: 583 million Euros

The cost of this revision stems from several aspects:

Redesign of artworks for the label. It is not uncommon for small companies to have over a thousand labels – different product types and different packaging sizes

New templates for the printers

The direct cost of fold-out labels. Fold-out labels will in many cases be required to fit all the text in the required format. A fold-out label can be up to 10 times more expensive. This is a reoccurring cost.

- Fold-out labels can influence the recyclability of the packaging negatively. In Sweden the EPR fee is differentiated based on recyclability and the switch to fold-out label can trigger a higher yearly packaging fee
- Fold-out labels can negatively influence companies' ability to ecolabel their products leading to loss of sales.
- Fold-out labels are thicker, changing the dimension of the packaging triggering other changes in the production line and stacking of products
- Companies with their own printers at the production site need to invest in new printers.
- Labels, preprinted packaging and already labelled products will have to be scrapped after deadline – this means costs for handling waste and the loss of resources. Relabelling of products in stock is not rational
- In some cases, to fit the text, companies will have to have different labels with different languages for the same type of product thus increasing the number of stock keeping units (SKUs). The storage space will then have to be increased which requires investment and increase reoccurring cost.
- An increase in stock keeping units (SKUs) also risk more products expiring with the cost of scrapping to follow.
- Some companies will have fewer languages on the label – leading to a loss in market.
- The increased space for CLP-label will decrease the space for marketing leading to a possible loss of sales.
- The increased space for CLP-label will decrease the space for information that the customer finds useful – leading to a decrease in customer satisfaction and a possible loss of sales.
- Not all factors in the list above were included in all companies cost assessments and the cost varies depending on number of different types of products.
- We urge the Commission to consider removing the formatting rules in the revised Annex 1 of the CLP as it will negatively affect the competitiveness of EU-companies and with limited to no consequences for the safe use of the products.
- For your information I am including a case description for one company. The collected detailed data is available upon request.

New rules for advertisements

We also urge the Commission to remove the obligation to include CLP-information in advertisement (article 48.2) The average cost of this new requirement is according to the feedback received is €21 470 per company. This is probably on the lower side as the cost of loss of market is not included when retailers choose not to include advertisement for chemical products due to this requirement.

About us

KTF - The Swedish Association of Chemical Products Suppliers is an association of five industry organizations. For example:

SVEFF - The Swedish Paint and Adhesive Association www.sveff.se

BPHR - The Swedish Association of Professional Hygiene & Cleaning www.bphr.se

KoHF - The Swedish Cosmetics, Toiletries and Detergents Association www.kohf.se