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FEICA Position on CLP aspects of the Chemicals Omnibus Proposal

Introduction

FEICA, the Association of the European Adhesive & Sealant Industry, represents more than 430 companies across Europe, the majority SMEs. Adhesives and sealants are essential enablers across industrial, construction, healthcare, transport and recycling value chains. Our sector is directly affected by the CLP Regulation and its 2024 revision (Reg. (EU) 2024/2865).

General position

FEICA welcomes the European Commission's Chemicals Omnibus proposal COM(2025) 531 as a practical step to simplify CLP while maintaining a high level of protection. As co-legislators develop their positions, we highlight the following priorities.

Font sizes

FEICA welcomes the Commission's proposal to remove the minimum font requirements and instead provide basic requirements for colour, font and line spacing for legibility. This change will reduce burdens on suppliers¹ (including downstream users) that would have resulted in unnecessary redesigning labelling and complications for existing stock, particularly small packaging.

Transition period for relabelling

Greater flexibility in the timeline for suppliers to update their labels is essential, however we also understand that legal clarity is needed. FEICA therefore supports a transition period that is no shorter than 18-month and sequentially scheduled. It is vital that every actor in the supply chain is given sufficient time to comply once informed of any upstream changes.

Digital contact

FEICA supports the inclusion of a "digital contact" option as an alternative to a telephone number. However, this flexibility should remain optional, as a mandatory digital contact would not suit all operators. For many suppliers, a telephone number remains the most efficient and reliable communication channel. We therefore recommend that the final text clearly specify: "digital contact and/or telephone number."

Small packaging

We welcome the <10 mL exemption but note ongoing space constraints up to 75 mL. We therefore support a derogation for packages ≤ 75 mL, coupled with the option to provide certain elements via

¹ In the sense of CLP Regulation, 'supplier' means any manufacturer, importer, downstream user or distributor placing on the market a substance, on its own or in a mixture, or a mixture; [Art. 2(26) Regulation (EC) N°1272/2008]

a QR code or equivalent digital access, ensuring full information remains available without compromising legibility or safety.

Advertisement and distance sales

We welcome the inclusion of option (b) in the Council's second compromise text: "Always read the label and product information before use. See hazard information at point of purchase." This wording delivers a clear message to consumers, helping to prevent confusion or misunderstanding while avoiding unnecessary redesigns.

Regarding distance sales, FEICA believes that reverting to the 2008 CLP requirements, applying only to the general public, would help streamline obligations and reduce administrative burdens. Requirements for non-general public users are already adequately addressed through the Safety Data Sheet, making additional provisions unnecessary.

Call to action

FEICA reiterates its support for the European Commission's proposed Omnibus VI on chemicals, recognising it as a positive step toward simplifying regulation and enhancing the competitiveness of our sector.

However, it remains essential that the final text adequately addresses the concerns outlined in this paper. Failure to do so could have a serious impact on the European adhesives and sealants sector, as well as on the wider chemical industry.

We therefore call on co-legislators to prioritise these files and reach a timely and balanced agreement, one that provides industry with the necessary regulatory certainty while ensuring appropriate consumer protection.

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