

Navigating Regulatory Change:

Key Updates to EU & UK CLP and REACH in 2025

Sep 2025

Topics

EU CLP

GB CLP

EU REACH

UK REACH



EU CLP

The CLP Revision

Regulation 2024/2865 – published Nov 2024, a major revision of the CLP Regulation



Key changes include

- Changes to classification procedures
- 6-month deadline to update labels for more severe classifications
- Changes to label formats
- Introduction of digital labelling provisions
- Changes to advertising rules and new rules for distance sales
- New obligations for refill stations
- Updates to the C&L Inventory
- New obligations to make PCN for relabellers, rebranders and distributors



Staged introduction

- Some changes immediate (legal clarifications and tidying, duties on ECHA, COM)
- Others such as label and advertising changes phased in over 18 – 24 months
- Full list of application dates:
[Application dates by CLP – ECHA](#)

Simplification Omnibus

Simplification of certain requirements and procedures for chemical products - European Commission

Proposal 1 (Stop the Clock) [COM(2025)526]

- Delay implementation of following requirements until 1 Jan 2028
 - Six-month deadlines for significant label updates
 - Mandatory formatting requirements for labels
 - Advertising and distance sales obligations
 - Labelling rules for fuel pumps

Proposal 2 (Simplification changes)[COM(2025)531]

- Not a roll-back of 2024/2865
 - Many changes not affected, will still apply
 - Some changes are reversed
 - Some changes are modified
 - Some **new provisions** introduced

Classification changes

Clarifications [applied from 10 Dec 2024]

- on use of Weight of Evidence approach to classification
- that where harmonised classifications specify a physical form they apply only to that form, but where a form is not specified they should apply to all forms

Acute Toxicity Estimates [applied from 10 Dec 2024]

- Definition added
- To be established for substances by manufacturers, importers and downstream users
 - Except where they have been set as part of a harmonised classification
- Manufacturers and Importers to include ATEs in notifications to the C&L Inventory

EUH statements listed in Annex II should apply to all mixtures if relevant, regardless of whether they are classified [applied from 10 Dec 2024]

Classification for complex substances with More than One Constituent Substance (MOCS)

- From a toxicological point of view, no different to mixtures
 - Aim to reduce new animal testing and ensure all data is taken into consideration
 - Mixture rules to be applied where these substances contain components of concern (CMRs, Endocrine Disruptors, Hazards to the Aquatic Environment, Persistence, Mobility, Bioaccumulation)
 - Data on substance itself can only be used to demonstrate positive effect, not overrule a calculation-based classification
 - **Applies from 1 July 2026**
- Derogation for plant extracts, not chemically modified
 - Within 5 years Commission to produce a report reviewing the scientific basis for the derogation and propose legislation if deemed to be necessary



The CLP Revision – Label Formatting Changes

Layout

- Introduces minimum font sizes (see table)
- Packaging < 10 ml may be smaller but must remain easily legible
- New rules on line-spacing (120% of font size)
- Text must be black on white background
- Single font, easily legible, sans serif
- Letter spacing – appropriate to be legible

Capacity of the package	Dimensions of the label (in mm)	Dimensions of each pictogram (in mm)	Minimum font-size (x-height in mm)
≤ 0,5 L	As possible	Not smaller than 10x10	1.2
≤ 5 L	At least 52x74	If possible, at least 16x16	1.4
≤ 50 L	At least 74x105	At least 23x23	1.8
≤ 500 L	At least 105x148	At least 32x32	2.0
>500 L	At least 148x210	At least 46x46	2.0

Applies from 1 Jan 2027 – Proposal 1 delays until 1 Jan 2028 – Proposal 2 rolls back to previous requirements

The CLP Revision – Changes to Labelling (2)

Explicit deadlines for updating labels (from when a new hazard evaluation is carried out or is communicated to a supplier) **[applies from 1 Jul 2026]**

- Without undue delay, and no later than 6 months where there is a more severe classification of an existing hazard, classification in a new hazard class, or new supplemental labelling requirements
- Without undue delay, and no later than 18 months for other updates
- Where the change is to a harmonized (Annex VI) classification, deadlines to remain as in the relevant ATP (typically 18 months)
- **Proposal 1 – delays until 1 Jan 2028**
- **Proposal 2 - reverts to “without undue delay” for more severe hazards, 18 months still stands for other changes**

Identification of hazardous components **[applies from 1 Jul 2028]**

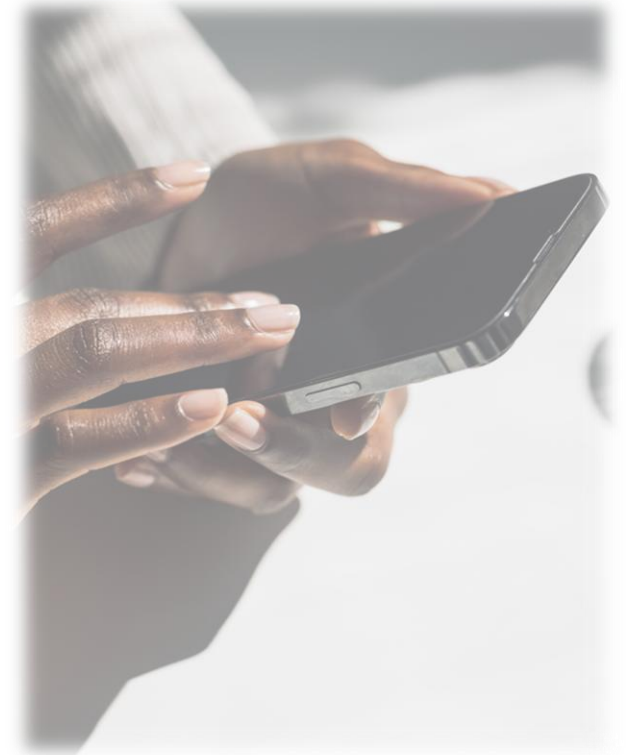
- ED, PBT/vPvB and PMT/vPvM substances to be identified on label

Supplier identified on labels must be established in the EU and acting in an industrial or professional activity **[applies from 1 Jul 2026]**

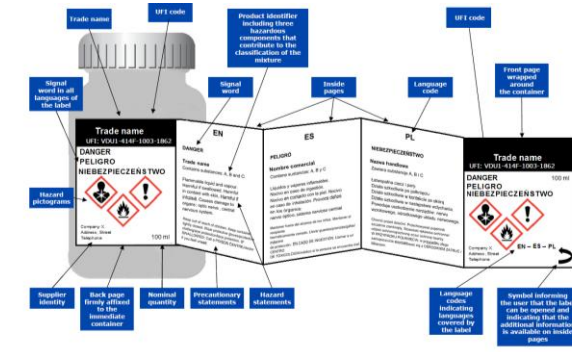
- **Proposal 2 - New digital contact instead of telephone number**

Digital Labelling [Applies from 1 Jul 2026]

- New framework that can be built on as technology develops
 - Initially, limited to provision of some supplemental info
 - **Proposal 2 - Extend to include additional addresses**
- “Data carrier” (e.g. QR Code) to be accompanied by “*More hazard information available online*” or similar
 - Accessible for at least 10 years
 - Available within 2 clicks and without registering, passwords, etc
 - EU data privacy requirements – no tracking beyond what is absolutely necessary
 - Must be accessible by vulnerable groups
 - Label elements to be kept together
 - Must be searchable



Small and awkward packages



Fold out labels [applies from 1 Jul 2026]

- Relaxation of requirements to allow general use of fold-out labels
- Rules for use of fold-out labels transferred from guidance into regulation (content provisions for front page, back page, inside pages)



Section 1.2.2.4 Packages ≤ 10 mls [applies from 1 Jul 2026]

- Initially provisions were limited to R&D chemicals
- New provisions extend derogation to other products as long as they are not classified in severe health hazard classes and categories
- Intermediate/outer packaging must be fully labelled
- **Proposal 2 – further relaxations**
 - Changes heading of this section to “packages” rather than “inner packagings”
 - Additional section added allowing package not to be labelled if not classified in any of the severe health hazard classes AND does not require any EUH statements, apart from EUH208.

Packaging Changes

Refill sales [Applies from 1 Jul 2026]

- New form of sales to reduce packaging waste and achieve recycling targets
- Clarifies labelling obligations
- Sets out risk management measures to be applied in stores, etc.
- Only allowed for certain hazard classes

Products supplied without packaging (Annex II, Part 5) [Applies from 1 Jul 2026]

- Label elements to be visible on the pump for fuels directly pumped into a vehicle
- For fuels pumped into approved containers, copies of label elements to be available to attach to the container
- Proposal 1 – delays until 1 Jan 2028
- Proposal 2 - removes requirement to show UFI on fuel pumps

Child Resistant Packaging

- Commission to review whether Child Resistant Fasteners should be extended to other hazard classes, particularly Eye Damage 1, within 5 years

Packaging and Advertising [Applies 1 Jul 2026]

Advertising

- Adverts to show label elements - pictograms, signal words, H and EUH statements
 - Pictograms and signal word may be omitted if advert is non-visual
- Adverts to general public to include new statement
- Adverts for hazardous substances and mixtures may not contain statements ('non-toxic', 'non-harmful', 'non-polluting', 'ecological') that are not allowed on the label
- **Proposal 1 – delays until 1 Jan 2028**
- **Proposal 2 - limits provisions to adverts to general public, adverts to include new statement (modified to align with other regs)**

Distance sales

- Offer must clearly show labelling info - pictograms, signal words, H and EUH statements
- **Proposal 1 – delays until 1 Jan 2028**
- **Proposal 2 - limits provisions to sales to general public**

Other Changes

C & L Inventory [**Applies from 1 Jul 2026**]

- Publication of:
 - the names of notifiers [NB can be claimed as confidential]
 - the reasons for diverging from the most severe notified C&L
 - the reasons for introducing a more severe notified C&L
 - the date of the latest update of the C&L
- If update of classification is needed, updates of notifications within 6 months
- Possibility for ECHA to flag to the notifiers concerned entries that in ECHA's view are incomplete, incorrect or obsolete

Poison Centres

- Introducing targeted notification obligations to poison centres in case of information loss
- Obligations to notify poison centres for relabellers, rebranders and distributors that are further distributing to another MS

Other EU Changes

- Annex VI updates

Regulation	Changes	EIF/Application date
23 rd ATP	REGULATION (EU) 2025/12 22 new entries, 10 revised entries	Published 20 th June 2025, Entered into force 20 days later Application Date: 1 February 2027
24 th ATP	Draft in preparation	To be discussed at ad hoc CARACAL meeting in December
	Further ATP planned to transfer existing classifications for ED and PBT/vPvB from REACH Candidate List, BPR and PPP Regulations	Deadline for adoption 1 Jul 2026

- Plans to update CLP to GHS Revisions 8-10
 - Draft text in development
 - Was expected in 2025 – no new info

What to do now?

1) Follow the legislative process:

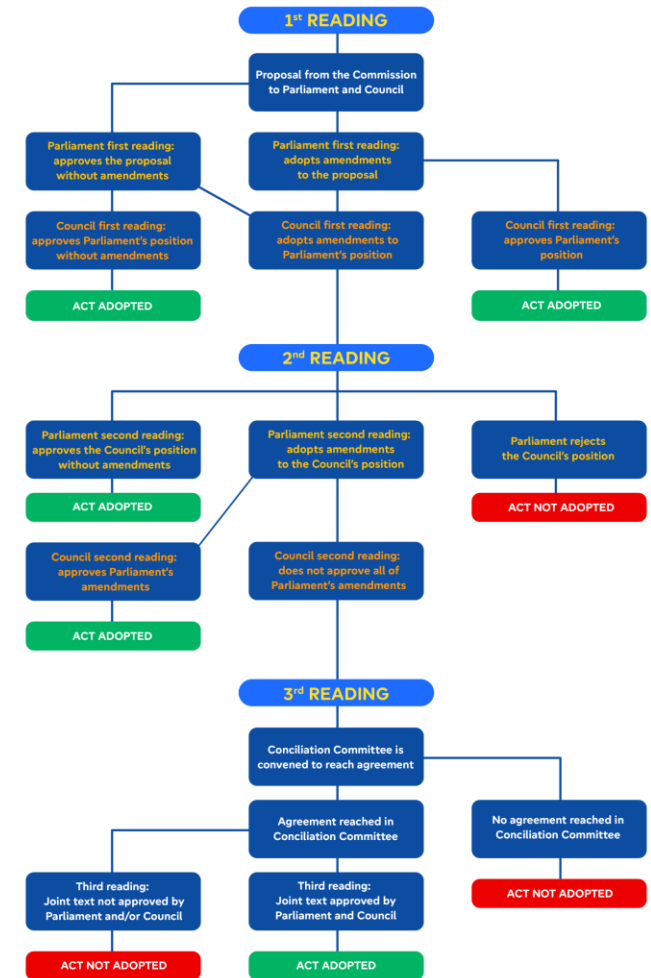
- **Proposal 1 (Stop the Clock) [COM(2025)526]** - [EUR-Lex - 2025_526 - EN - EUR-Lex](#)
WTO Consultation ends 12 Oct 25
Proposed adoption 2026
- **Proposal 2 (Proposed changes) [COM(2025)531]** [EUR-Lex - 2025_531 - EN - EUR-Lex](#)
WTO Consultation ends 14 Oct 25
Proposed adoption Q2 2026

2) Make a plan!

Options:

- Do nothing - wait and see
- Worst case - full scale ahead - prepare to implement by Jul 2026 & Jan 2027
- Do the planning but wait to press the button – review affected products, resources needed, budget, etc

REMEMBER – not everything is being reviewed/rolled back – still need to action those amendments not included in the simplification proposals





GB CLP Changes

Meanwhile in the UK

Not planning to adopt new hazard classes until GHS does so

Not planning to adopt new label requirements – looking at pragmatic solutions for conflicts between EU and GB requirements for NI

Consultation on changes to GB CLP (closed 18 August 2025)

- Amendment of procedures for evaluating mandatory classification and labelling proposals
 - Break automatic requirement to review all EU classifications
 - Fast track procedure for classifications from jurisdictions that adopt GHS and have a transparent classification process
- Revoke the requirement to make notifications to HSE
 - No public database – lack of resources, concerns over accuracy/up-to-date
 - System is burdensome for industry
- Move Notes to classifications to HSE website
 - Simpler to find, easier for HSE to update them as needed
- New powers for HSE to make changes
 - To adapt to UN GHS and possibly other international agreements
 - To improve compliance and address ambiguities
 - Ease frictions between NI and GB



EU REACH

REACH 2.0 Proposals

First announced back in 2020, proposals were pushed back to 2022, then beyond

Details of latest proposals presented at CARACAL 54 in April



Key proposals include:

10 year
validity
period for
registrations

Polymer
notification
and full
registration for
certain
polymers

More stringent
evaluation
and
compliance
checks

Chemical
safety
assessments
to cover EDs,
PMT/vPvM

Mixture
assessment
factors

Clarification of
requirements
for nanoforms

Digitalisation
of SDS and
introduction of
digital product
passports

Introduction of
criteria for
national
enforcement
systems and
audits across
Member
States

Distance
selling
provisions

Streamlining
the restriction
process

REACH 2.0 Timescales

3 week stakeholder consultation period following CARACAL

Industry sharply critical of the proposals

COM drafting legislation over Summer

Due for publication by end 2025

November CARACAL postponed until January

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UK REACH

UK REACH



EU REACH regulation was adopted into UK legislation following Brexit

- Considered to be too costly in a UK only context, not necessary to provide all data again for substances already registered in the EU

UK Government therefore pushed back the initial registration deadlines and issued a consultation on an Alternative Transitional Registration model back in 2024

- Still no decisions on what information industry will need to provide in registration dossiers
- Current deadlines for registration considered to be unachievable (first deadline is Oct 2026)

Government therefore proposes further extending transition period whilst options are considered

- *Option 1: October 2029, October 2030, October 2031*
- *Option 2: April 2029, April 2031, April 2033*
- *Option 3: April 2029, April 2030, April 2031*

Consultation closed 8th September

- Awaiting outcome on which option will be selected

Any questions?

