# A.I.S.E. POSITION PAPER ON THE EUROPEAN CHEMICALS INDUSTRY ACTION PLAN

## A.I.S.E. position paper

A.I.S.E., the voice of the detergents and maintenance products industry in Europe, welcomes the European Chemicals Industry Action Plan and the accompanying Omnibus legislative proposal on chemicals. As a sector to which the CLP Regulation applies, we acknowledge the European Commission's efforts to address the regulatory burdens that impact the formulation, labelling, and marketing of detergent products.

We also strongly endorse the European Commission's proposal COM(2025) 526, which amends Regulation (EU) 2024/2865 to postpone the application dates of several burdensome provisions. This is a vital step to ensure legal certainty and operational feasibility for companies, especially as they navigate the transition toward a simplified regulatory framework.
We urge co-legislators to adopt this proposal swiftly, as it provides the clarity industry needs while awaiting the outcome of the simplification process.

Of utmost relevance for our sector is the Commission's proposal to amend Regulation (EC) No 1272/2008 (CLP), Regulation (EC) No 1223/2009, and Regulation (EU) 2019/1009. We appreciate the Commission's commitment to streamlining requirements without compromising the high level of protection of human health and the environment.

### Key areas of support

### Label formatting rules

A.I.S.E. fully supports the European's Commission intention to remove rigid requirements such as minimum font sizes and line spacing, which will prevent unnecessary product's relabelling, reduce packaging waste, and avoid excessive costs especially for SMEs, with savings estimated at over €330 million[1].

These formatting rules were especially challenging for detergent products. With the simplification proposal, which effectively reinstates the previous, more flexible approach, the Commission ensures that:

- Multi-language labels, essential for market clustering, can remain on the market. The proposal rightly acknowledges that enlarged fonts and spacing would reduce available space on labels, forcing companies to either reduce language coverage or create additional Stock Keeping Units (SKUs), thereby increasing complexity, storage needs, and waste. Illustrative examples of these challenges are provided in Annex I.

- The omnibus provisions allowing multilingual labels will also help maintaining across-market flexibility without penalising smaller markets, enabling better market access. It also

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[1] COM(2025)531 - 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, page 10

reduces product disposal, in line with the goals of the Ecodesign for Sustainable Products Regulation (ESPR), promoting waste reduction and circularity.

- Fold-out labels, which are 3 to 5 times more expensive than standard labels, will be used less frequently. These labels reduce recyclability, increase Extended Producer Responsibility (EPR) fees, complicate logistics and packaging design, and may hinder ecolabel certification due to altered packaging dimensions.

- On-pack UFI printing will remain a viable solution for industry, helping to avoid frequent artwork changes triggered by low thresholds for new UFI codes. The proposal recognises that not all packaging is white, and requiring white print areas would introduce design complexity. Additionally, many existing laser systems cannot print in black-on-white without costly upgrades, so maintaining flexibility helps avoid unnecessary investments.

## Labelling update timelines

The new provisions introducing more realistic timelines for label updates are welcomed. A six-month update period is not feasible for complex supply chains, as illustrated in Annex II of this document. Allowing suppliers of substances or mixtures to update labels without undue delay following the results of a new evaluation promotes fairness and aligns with the provisions for labelling updates after a harmonised classification enters into force, which is set at 18 months after its publication in the Official Journal.

## Advertising obligations

A.I.S.E. fully supports the proposed simplification of advertising rules for hazardous products sold to the general public. The revised approach focuses on a clear call to action such as "Always follow the information on the product label", which strikes a better balance between safety and practicality. It also contributes to better alignment of CLP with other sectoral legislation, such as that governing pharmaceuticals.

This change is particularly important for digital and audio formats, where space and time are limited. The current rules are requiring full hazard information in all advertisements, risking overwhelming consumers with complex details, ultimately reducing attention to the actual product label and undermining effective hazard communication. Examples of advertisements issues following the implementation of the new CLP provisions are available in Annex III.

Moreover, requiring prominent hazard warnings in advertising would unfairly discriminate against more highly concentrated and sustainable detergent products, due to their more severe CLP classification. This could lead consumers toward more diluted alternatives, ultimately undermining environmental and sustainability goals.

The simplified provision ensures that essential safety messaging is preserved, while allowing companies to communicate responsibly and effectively across modern media channels.

## Digital labelling

A.I.S.E. supports the broader use of digital labelling as a modern, flexible solution that improves both compliance and communication. The simplification proposal rightly allows digital contact details to be provided on the label.

This is especially relevant for detergent products, which often require multilingual labels and face space constraints. Digital labelling helps to maintain compliance, enables faster updates, reduces the need for costly reprints and frees up space for clearer hazard communication.

It also aligns with the EU's goals for digital transformation and sustainability, offering a practical way to reduce packaging complexity while ensuring accessible safety information.

**Small packaging**
A.I.S.E. supports the proposed simplification for small packaging, which introduces automatic derogations for containers under 10 ml and clarifies the rules for other compact formats.

Under the previous rules, companies had to justify that a package was too small to meet full labelling requirements, an inefficient and burdensome process. The new approach avoids unnecessary administrative hurdles and prevents companies from having to increase packaging size solely to fit label contents, in alignment with EU objectives on packaging minimisation and circularity under the Packaging and Packaging Waste Regulation (PPWR), while ensuring that essential safety information remains accessible.

**Regret over the omission of Article 9(4) revision**
A.I.S.E. regrets that the simplification proposal does not address the revision of Article 9(4) of the CLP Regulation, which currently restricts the use of expert judgment in mixture classification. This is particularly problematic for users of DetNet, the voluntary initiative under the umbrella of A.I.S.E., a platform supporting scientifically robust classification of detergent mixtures.

DetNet enables companies to classify detergent mixtures by using scientifically sound expert-reviewed data and bridging principles, especially for skin and eye effects where calculation methods often lead to over-classification in the specific case of detergent mixtures.

Such misclassifications led to overly conservative medical interventions, as reported by Poison Centres. The current provision forces companies to rely on costly and time-consuming in vitro testing, up to €10,000 per test, even when reliable classification data already exists and is available on DetNet.

We urge the Commission and co-legislators to address this issue during the legislative process and restore the ability to apply expert judgment, ensuring a balanced, science-based approach that supports innovation, accuracy, and consumer trust.

**Conclusion and next steps**
A.I.S.E. supports the Commission's efforts to reduce regulatory burdens and enhance the competitiveness of the EU chemicals sector.
We call on Member States Competent Authorities to support the Commission's proposal as such and to ensure that the final legislation delivers on its promise of simplification and competitiveness, including for SMEs, while safeguarding human health and the environment.

We remain committed to supporting implementation and working collaboratively with all stakeholders to ensure a balanced, science-based regulatory framework for chemicals in Europe.

## About A.I.S.E.
A.I.S.E. represents the detergents and maintenance products industry in Europe. Based in Brussels, A.I.S.E. has been the voice of the industry to EU regulators since 1952. Membership consists of 30 national associations across Europe, 20 corporate members and 19 value chain partners. Through this extensive network, A.I.S.E. represents over 900 companies supplying household and professional cleaning products and services across Europe. Committed to promoting sustainable practices and innovation, A.I.S.E. collaborates closely with European institutions, industry stakeholders, and the public to enhance the sector's environmental protection, consumer safety, and regulatory compliance efforts. www.aise.eu
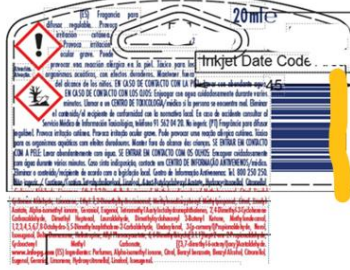
# ANNEX I

Examples of artwork demonstrating challenges in following the new CLP labelling requirements of minimum font size and 120% of font size distance between lines.



*Figure 1: Example of multilingual label following previous CLP formatting rules (left) and 2024 provisions rules (right)*



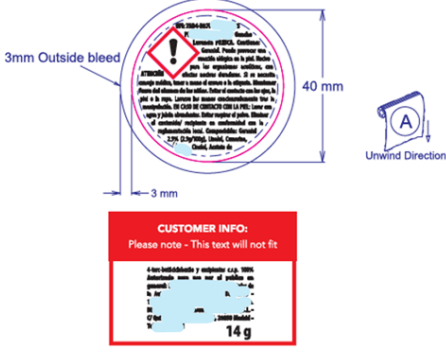*Figure 2: Example of mono-lingual label following previous CLP formatting rules (left) and 2024 provisions rules (right)*

# UFI formatting example



**Is black text on white background really needed for UFI?**

- Laser print technology in use today to online print
- UFI codes on high-speed packing lines
- 1.2 x mm height size in white on green background
- No use of traditional printer inks that can also smudge

*Figure 3: Example of UFI printing on artwork following previous provisions - not black-on-white*

*Figure 4: Mock up of detergent label showing all required information to display for each piece of relevant legislation impacting the detergent products*
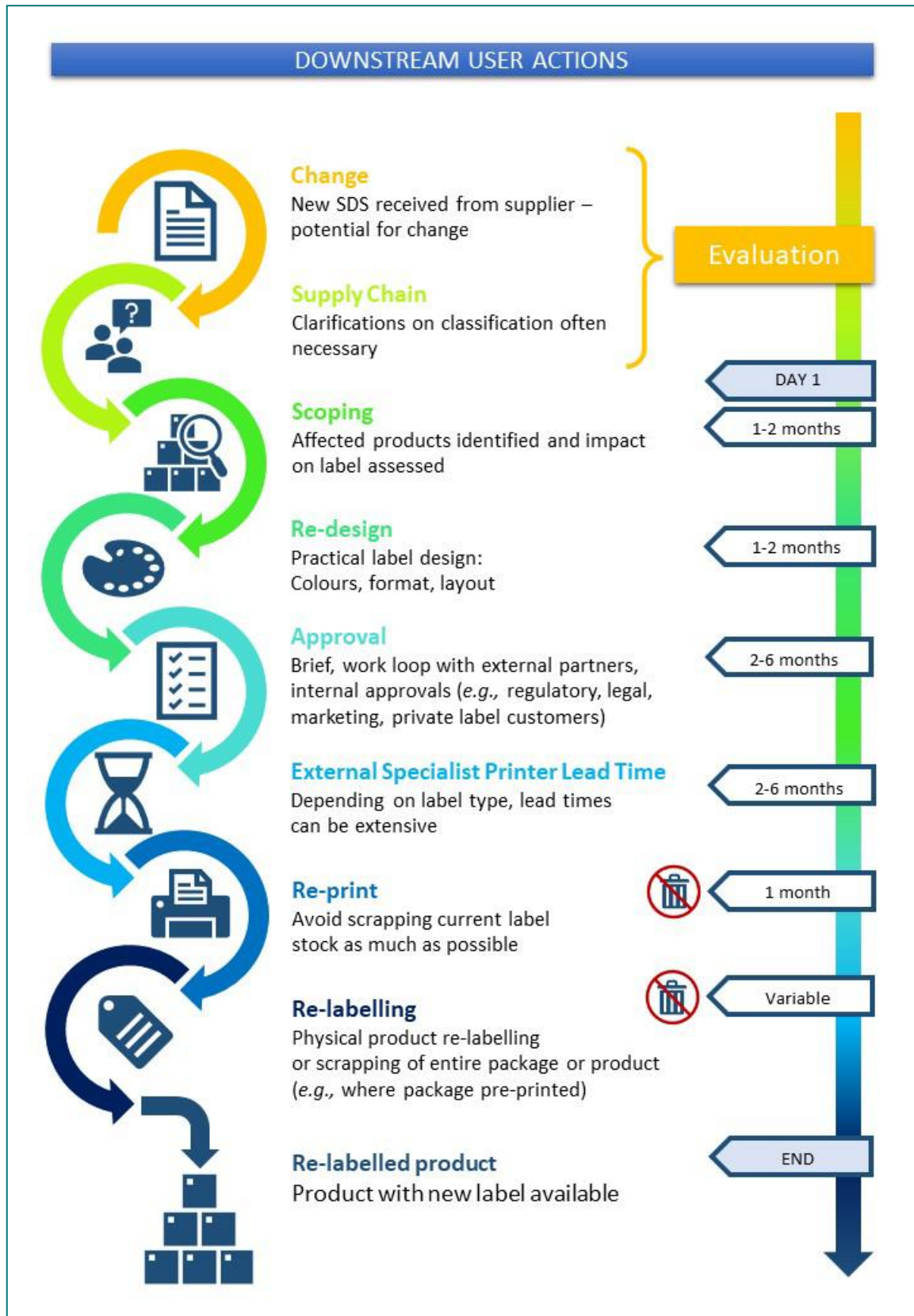
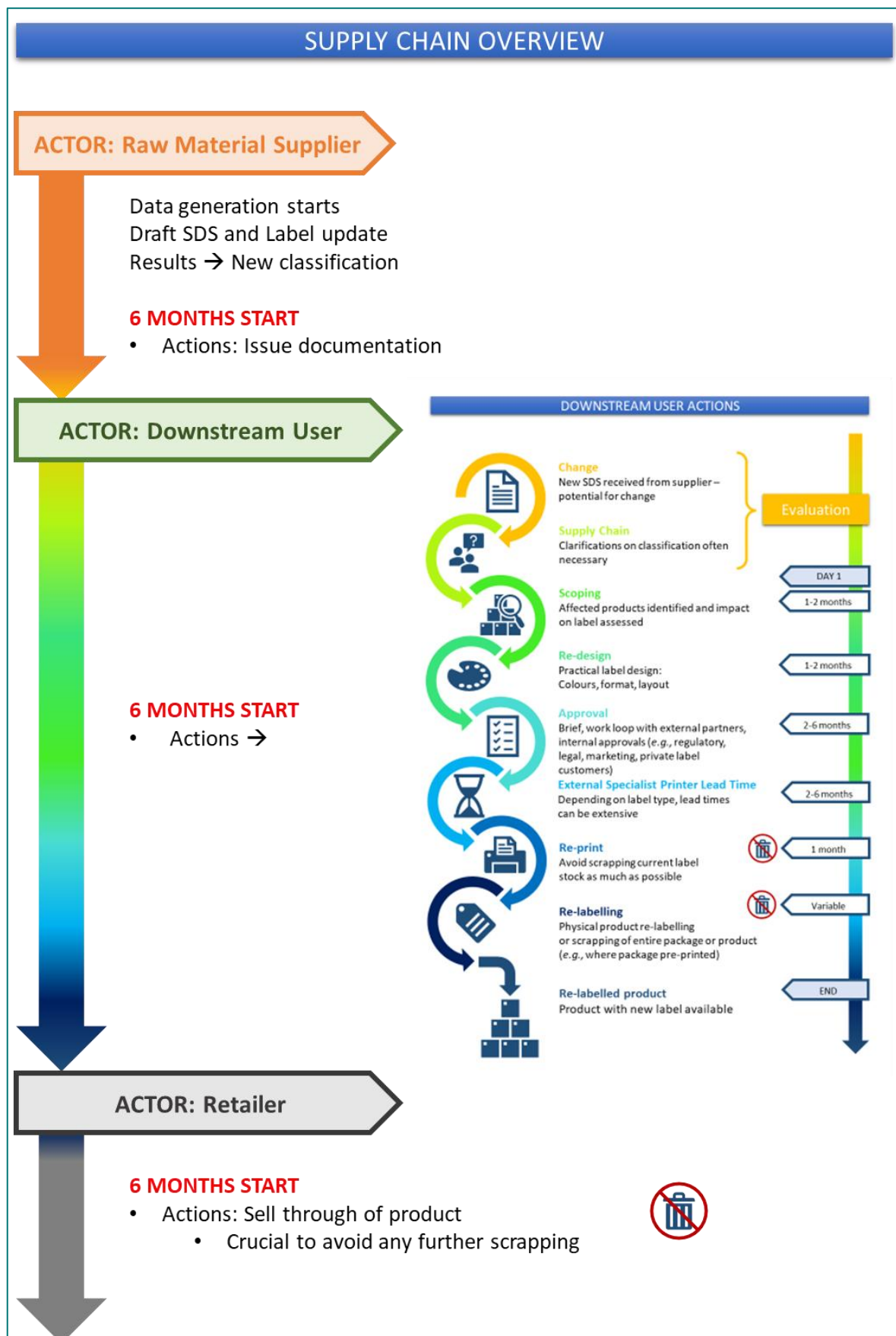*Figure 5: Infographic on the process and timeline of artwork update for downstream users*

## SUPPLY CHAIN OVERVIEW

**ACTOR: Raw Material Supplier**

Data generation starts
Draft SDS and Label update
Results → New classification

**6 MONTHS START**
- Actions: Issue documentation

**ACTOR: Downstream User**

**6 MONTHS START**
- Actions →

### DOWNSTREAM USER ACTIONS

**Change**
New SDS received from supplier – potential for change

**Supply Chain**
Clarifications on classification often necessary

**Scoping**
Affected products identified and impact on label assessed

**Re-design**
Practical label design: Colours, format, layout

**Approval**
Brief, work loop with external partners, internal approvals (*e.g.*, regulatory, legal, marketing, private label customers)

**External Specialist Printer Lead Time**
Depending on label type, lead times can be extensive

**Re-print**
Avoid scrapping current label stock as much as possible

**Re-labelling**
Physical product re-labelling or scrapping of entire package or product (*e.g.*, where package pre-printed)

**Re-labelled product**
Product with new label available

| | |
|---|---|
| Evaluation | |
| | DAY 1 |
| | 1-2 months |
| | 1-2 months |
| | 2-6 months |
| | 2-6 months |
| | 1 month |
| | Variable |
| | END |

**ACTOR: Retailer**

**6 MONTHS START**
- Actions: Sell through of product
  - Crucial to avoid any further scrapping

*Figure 6: Infographic on the process and timeline of artwork update for supply chain*
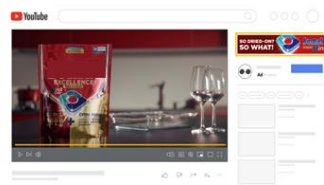
# Advertisement

**CLP 2024 article 48 (2):**

"**Any** advertisement for a mixture classified as hazardous [...] shall indicate the hazard **pictograms**, **signal words**, **hazard statements** and supplemental **EUH statements** [...] . Any advertisement for [...] general public shall, in addition, state **"Always follow the information on the product label"."**

▪ **Implementation** for variety of media channels simply **not possible**

▪ **Safe use → very low incident rate** does not suggest that intensified hazard communication is needed

▪ **Disproportionate** inflation of hazard communication at a touchpoint that is **not the point of purchase or use**

▪ Discrimination of **concentrated products** ⮕ punishes sustainability efforts

*Figure 7: Example of TV product advertisement*

# Social media

**Additional requirements not implementable**

▪ Companion banner: very small in nature and only pops up on websites for limited amount of time – **no space or time for comprehensive hazard information**

▪ Instagram stories: fast-paced and short – **no space or time for comprehensive hazard information**

➢**No added value for consumer** if they see safety information for a fraction of the time

➢**Current rules are enough**: All hazard information is clearly stated at the point of sale

  • On the package for offline sales
  • On the website for online sales

**YouTube Short Ads & Companion Banners**

**Instagram Story Ad**

*Figure 8: Example of social media product advertisement*

# Radio/podcast advertising

**No added safety value; but higher costs for industry**

- 12 Seconds additional ad length to read the hazard information will lead to increase in cost for industry

- No added value for consumer to be read hazard information that they won't understand / pay attention to

*Figure 9: Example of radio/podcast product advertisement*

# Advertising print multi-language (be)

Gefahr. Verursacht Hautreizungen. Verursacht schwere Augenschäden. Schädlich für Wasserorganismen, mit langfristiger Wirkung. Die Informationen auf dem Produktetikett sind stets zu befolgen. Danger. Provoque une irritation cutanée. Provoque de graves lésions des yeux. Nocif pour les organismes aquatiques, entraîne des effets néfastes à long terme. Veillez à toujours suivre les informations figurant sur l'étiquette du produit. Gevaar. Veroorzaakt huidirritatie. Veroorzaakt ernstig oogletsel. Schadelijk voor in het water levende organismen, met langdurige gevolgen. Neem altijd de informatie op het etiket van het product in acht.

Achtung. Verursacht Hautreizungen. Lesen und beachten Die Informationen auf dem Produktetikett sind stets zu befolgen. Attention. Provoque une irritation cutanée. Veillez à toujours suivre les informations figurant sur l'étiquette du produit. Waarschuwing. Veroorzaakt huidirritatie. Neem altijd de informatie op het etiket van het product in acht.

Achtung. Verursacht Hautreizungen. Verursacht schwere Augenreizung. Schädlich für Wasserorganismen, mit langfristiger Wirkung. Die Informationen auf dem Produktetikett sind stets zu befolgen. Attention. Provoque une irritation cutanée. Provoque une sévère irritation des yeux. Nocif pour les organismes aquatiques, entraîne des effets néfastes à long terme. Veillez à toujours suivre les informations figurant sur l'étiquette du produit. Waarschuwing. Veroorzaakt huidirritatie. Veroorzaakt ernstige oogirritatie. Schadelijk voor in het water levende organismen, met langdurige gevolgen. Neem altijd de informatie op het etiket van het product in acht.

- **Quantity of hazard phrases** makes detergent products **unattractive for supermarket circulars**

- **Major additional red tape** due to coordination effort with retailers to **submit hazard information** along with product information

- **Current rules are enough**: All hazard information is clearly stated at the point of sale
    - On the package for stationary sales
    - On the website for online sales

*Figure 10: Example of printing multi-language products advertisement*

# Conclusion

**Problem Statement**

- The CLP requirements are not compatible with the current advertising formats and practices.

- They will be a heavy financial and administrative burden for industry.

- They undermine sustainability efforts.

- They don't align with Commission's priorities.

- Advertising in other sectors is already regulated in an efficient way.

**Solution**

- We support providing a generic statement such as "Always read the label" instead of providing full CLP information

- Audio advertisements (such as on radio or streaming platforms like Spotify) should be exempt

*Figure 11: Conclusion on advertisement*