



Update on the Current EU Chemical Legislations

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EU Chemical Legislations Update (2026)

- Classification Labelling & Packaging Regulation (CLP)
- Unique Formula Identifier (UFI) (under CLP)
- Per- and polyfluoroalkyl substances (PFAS) (under REACH)
- Diisocyanates (under REACH)

Focus is on operational and compliance impacts for Industry,
Importers, Distributors & Operators

EU Regulatory Landscape – 2026 Overview

CLP Regulation – Overview

- Regulation (EC) 1272/2008 - Establishes harmonised hazard classification and communication in the EU
- Aligns EU with UN GHS system - an international standard managed by the United Nations to unify how chemical hazards are classified and communicated
- Applies to substances & mixtures placed on EU market

CLP Regulation – Overview

- Directed to manufacturers, importers, and downstream users of chemical substances and mixtures
 - Manufacturers and importers must classify substances before placing them on the market
 - Downstream users must classify mixtures
 - Distributors must ensure labels and packaging remain compliant and not altered unlawfully

CLP Revision – Regulation (EU) 2024/2865

- **Major update was adopted in 2024**
 - New hazard communication requirements
 - Enhanced digital & online sales obligations
 - Improved label readability standards for improved readability
 - Introduction of digital labelling (not mandatory)

CLP – Key New Provisions for Industry

- **Online sales must display hazard information**
 - Advertising must reflect hazard classifications
 - Distance sellers must ensure hazard pictograms, signal words and hazard statements are visible prior to purchase
 - Updated label formatting (font size, layout, spacing)
 - Label design must meet minimum font size and spacing rules

CLP – Key New Provisions for Industry

- Refill stations & bulk supply labelling rules
 - Refill operators must ensure hazard communication is maintained at point of refill
- Stronger C&L notification obligations
 - Companies diverging from harmonised classifications must provide scientific justification in C&L notifications

CLP – Key Requirements for CLP Label Design

- **Minimum Font Size (x-height)** - The height of the lowercase 'x' must meet the following standards

Liters

- **≤ 0.5Liters:** 1.2 mm
- **0.5 – 3 Liters:** 1.4 mm
- **3 – 50 Liters:** 1.8 mm
- **> 50 Liters:** 2.0 mm

CLP – Key Requirements for CLP Label Design

- **Spacing and Layout**
 - **Line Spacing** - The distance between lines must be at least 120% of the font size
 - **Letter Spacing** - Must be appropriate to maintain legibility
 - **Color Contrast** - Text must be black on a white background
 - **Font Style** - A single, easily legible, sans-serif font is required

CLP – Key Requirements for CLP Label Design

- **Exceptions**

- For inner packaging holding less than 10 ml, smaller fonts may be used if the outer label is fully compliant and the information remains legible
- **Fold-out Labels** are permitted to help accommodate the new formatting, particularly for multilingual information, but must meet specific front-page, inner-page, and back-page requirements

CLP – Digital Labelling

- Label elements for substances and mixtures **must** be provided on a physical label, but they can also be presented in digital form. Suppliers may provide certain label elements digitally only, as long as they are not essential for the safety of the user or the protection of the environment.

CLP – Digital Labelling

- General rules and technical requirements for digital labels include the following aspects:
 - All label elements must be provided together and separately from other information
 - Information must be searchable and accessible to all users in the Union for at least 10 years
 - Digital labels must be free of charge, without registration or installation requirements
 - Information must be accessible to vulnerable groups and presented in a user-friendly manner
 - Digital labels must be accessible with no more than two clicks and compatible with widely used technologies
 - Language choice must not be conditioned by geographical location

CLP – 'Stop-the-Clock' Timeline Update

- **Regulation (EU) 2025/2439** postponed most major new obligations until 1 January 2028
 - Original application - 2026 – 2027
- This affects **relabelling timelines, online sales obligations and label formatting changes**

CLP – 'Stop-the-Clock' Timeline Update

- Transitional period allows preparation time
- The postponement does not remove obligations but provides legal certainty and transition time for supply chain adaptation.

CLP – Supply Chain Responsibilities

- Manufacturers & Importers - Correct classification & C&L notifications
- Distributors - Verify compliant labels before supply
- Downstream Users - Correct labelling of formulated mixtures
- All actors - Prepare systems for 2028 compliance

UFI & Poison Centre Notification (PCN) - CLP Article 45(4) Annex VIII (2)

- **Mandatory for hazardous mixtures**
 - UFI must appear on label
 - PCN submission to national poison centres is required
 - Each hazardous mixture must have a UFI linking it to poison centre data
 - Formula changes require updated PCN submission

UFI & Poison Centre Notification (PCN) - CLP Article 45(4) Annex VIII (2)

- Applies to consumer, professional & industrial products
- Importers and formulators must ensure correct UFI generation and label placement
- Ongoing obligation (no postponement)

PFAS – EU Regulatory Approach

- Broad restriction proposal under REACH under evaluation
 - The EU is pursuing a group restriction approach covering most PFAS
- Sector-specific bans (e.g., firefighting foams)
 - Restrictions may apply via concentration limits, use bans, or sector-specific phase-outs.
- Phase-out approach with possible essential-use exemptions

PFAS – Industry Implications

- Mapping PFAS use in products & supply chains
 - Monitoring REACH restriction progress
 - Preparing substitution strategies
 - Engaging in consultation processes

Diisocyanates – REACH Restriction (Annex XVII)

- Restriction effective since 24 August 2023
 - This restriction targets occupational asthma risks
- Applies to $\geq 0.1\%$ concentration in products
- Mandatory training for industrial/professional users
- Training must be documented & renewed every 5 years
 - Documentation must be retained for enforcement purposes

Diisocyanates – Supply Chain Duties

- Manufacturers/Importers - Provide training information
 - Suppliers must ensure training materials are available and communicate obligations in SDS and labels
- Downstream Users - Ensure workers trained before use
- Applies across EU including Malta

Diisocyanates in Malta

- No evidence of large-scale manufacturing in Malta
 - Malta does not host major petrochemical production facilities
- Likely use in construction (PU foams, coatings, adhesives)
- Training & REACH obligations fully applicable
 - Local enforcement via Maltese competent authorities

Key Compliance Actions and Recap (2026–2028)

- Review product classifications & SDS updates
 - Plan relabelling & IT system updates for 2028
 - Audit PFAS presence in product portfolio
 - Ensure diisocyanate training compliance
 - Monitor legislative developments continuously



Thank You for your Attention