



Downstream Users of Chemicals Co-ordination group

## **DUCC calls for urgent adoption of the CLP simplification proposals**

2 September 2025

The Downstream Users of Chemicals Co-ordination Group (DUCC) is a platform of 11 European associations which represent “downstream” industries ranging from cosmetics and detergents to aerosols, paints, inks, toners, pressroom chemicals, adhesives and sealants, construction chemicals, fragrances, disinfectants, lubricants and chemical distributors industries. Our companies are heavily impacted by CLP Regulation and the revision through [Regulation 2024/2865](#).

We welcome the Commission’s twin proposals<sup>1</sup> published on 8 July 2025 simplifying the rules under the CLP Regulation, introducing greater flexibility and helping to eliminate excessive costs for our sectors. The proposals improve the CLP Regulation by reducing unnecessary administrative burdens, especially for small and medium-sized enterprises (SMEs), without compromising the protection of human health or the environment.

However, DUCC urges the European Parliament and the Council to use available urgency procedures to advance on these proposals as soon as possible. Many companies have been investing and continue to do so to ensure compliance with the new rules under Regulation 2024/2865. If there are changes expected, as proposed by the Commission, then discussing these proposals must be accelerated and prioritised by the co-legislators to clarify what the future rules are.

### **The main elements of the simplification proposal**

In general, DUCC supports the changes put forward by the Commission in its Omnibus VI to simplify EU chemicals legislation, especially the following elements:

- **Label formatting rules** – We support the reversal of the mandatory label formatting rules brought by the CLP revision. This change will avoid unnecessary redesign, waste of already-compliant stock, and even withdrawal of products from some smaller or multilingual markets.
- **Advertising** – The proposed simple and clear message of “*Always read the label and product information before use*” for consumer uses is welcomed. It aligns CLP with the medicines advertising and avoids confusing or misleading consumers.
- **Timelines** – Offering greater flexibility in the timeline for suppliers to update their labels is highly important. The proposed rules would reflect better the real-world supply chain dynamics and offer more adequate time to adapt, especially for SMEs.

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<sup>1</sup> [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 (COM(2025)531)  
[Proposal for a Regulation](#) of the European Parliament and of the Council amending Regulation (EU) 2024/2865 as regards dates of application and transitional provisions (COM(2025)526)



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- **Small packaging** – We support the ability to reduce the information provided on labels for small packaging, in the interests of clearer communication to consumers.
- **Digital solutions** – While we support the proposal to allow suppliers to provide a “digital contact” instead of a telephone number, this option should be voluntary rather than mandatory as for some companies providing a phone number may be the most efficient solution. Furthermore, making a digital contact mandatory creates another label transition where companies will have to update labels before a particular deadline rather than allowing companies to update labels in an efficient manner.

### Need for urgent action

While the Omnibus is a step in the right direction, the deadlines set by the CLP Regulation are fast approaching. This means that any change the Omnibus proposals would bring, must be agreed on urgently.

DUCC therefore calls on the European Parliament and the Council to adopt COM(2025)526 without delay and to progress on the proposal COM(2025)531 through using existing fast-track procedures.

We look to the Committee on the Environment, Climate and Food Safety (ENVI) and the Danish Presidency of the Council to prioritise these files and support the Commission’s proposals that aim to reduce complexity and avoid unnecessary burdens for companies.

### About DUCC

DUCC is a joint platform of **11 European associations** whose member companies use chemicals to **formulate mixtures** (as finished or intermediary products) for professional and industrial users, as well as for consumers.

DUCC focuses on the downstream users’ needs, rights, duties and specificities under **REACH** and **CLP**.

DUCC’s membership represents several important industry sectors, ranging from cosmetics and detergents to aerosols, paints, inks, toners, pressroom chemicals, adhesives and sealants, construction chemicals, fragrances, disinfectants, lubricants, crop protection, and chemical distributors industries. Altogether, their membership comprises more than **9.000 companies** across the respective sectors in Europe, **the vast majority being SMEs**. The calculated turnover of these companies is more than 215 billion euros in Europe.

**For more information on DUCC:** [www.ducc.eu](http://www.ducc.eu)

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DUCC’s public ID number in the **Transparency Register of the European Commission** is: **70941697936-72**