

# A.I.S.E. RECOMMENDATION FOR OMNIBUS SIMPLIFICATION PACKAGES

## Regulation for Classification, Labelling and Packaging of Mixtures and Chemicals (CLP) March 2025

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### Background

#### Polish Presidency asks Member States' opinion on Omnibus Simplification Packages

- Ahead of the Competitiveness Council (Internal Market, Industry, Research) on 6 March, the Polish Presidency of the Council [has circulated](#) a paper aiming to discuss the Omnibus Simplification Packages.
- The Presidency explains that a first omnibus package will be published soon and will focus on the streamlining and simplification of sustainability reporting and due diligence, and the EU taxonomy. A second package will focus on investment simplification. A third omnibus package will, amongst other things, focus on small mid-caps and reducing the administrative burden by cutting red tape in product legislation.
- The Presidency then asks Member States two questions:
  - Which other areas in the EU acquis other than those already covered by announced omnibuses require urgent simplification measures in order to strengthen our competitiveness?
  - How can we ensure that the 'Omnibus method' delivers, leading to swift agreement and simplification on the ground? What further measures can be taken to ensure that simplification measures are prioritized?

### A.I.S.E. Recommendations

A.I.S.E. would like to suggest an additional area which requires urgent simplification measures in order to strengthen the competitiveness of the cleaning industry in Europe, which is the **Classification, Labelling and Packaging of chemicals (CLP) Regulation.**

The provisions in the newly adopted revision of CLP, particularly those in the Annex I, on the formatting rules and on the minimum font sizes requirements, will be particularly difficult to implement for most actors in the value chain, especially given the new provisions for digital labels will not provide the needed flexibility to reduce costs. Manufacturers, distributors, and importers are all equally impacted by these new requirements and are all very concerned.

**One direct consequence of the new requirements will be that it will be almost impossible to fit several languages on a single label**, limiting the free movement of substances and mixtures across the EU. A multilingual label allows a container/product to be ready to place on the market in as many countries as the number of languages available, whereas a single language label requires relabelling of the container upon shipping, reducing flexibility, creating labour



intensive relabelling, causing delays in supply chain, driving costs up etc. This also has an impact on recyclability of the packaging materials and increases the use inks, glue, paper etc.

This means that in many cases fold-out labels will now be the only choice to accommodate multilingual labels (or even single language labels in many cases), under the provisions set out in the new Annex I to CLP, for which the lead time and complexity will soar, with risk of outdated labels and higher inventory costs.

The prohibitive cost of creating additional Stock Keeping Units (SKUs) for smaller markets may prevent companies from offering products in those regions, as the cost may not be justified from a business perspective.

Additionally, CLP's increased information requirements will in many cases lead to larger labels and, in some cases, bigger packaging, **conflicting with the Packaging and Packaging Waste Regulation's (PPWR) goals of waste prevention and reduction through the minimisation of packaging volumes.**

Further details on the expected consequences (e.g. visibility, practical and financial impact) are described in the Annex I and Annex II of this document.

## ANNEX I

### ➤ **Font sizes and line spacing**

Prior to the CLP revision, there was the ECHA guidance acknowledging the flexibility for the supplier with a reference to a minimum 1,2 mm letter x-height that applied to all packaging sizes. The provisions included in the conclusions of the revision foresee an array of minimum font sizes ranging from 1,2 mm to 2,0 mm letter x-height, respectively for containers between 0,51 and above 500L and line spacing of 120%.

It is notable that the Regulation (EU) No 1169/2011<sup>1</sup> on the provision of food information to consumers specifies that 1.2mm letter x- height, or 0.9mm letter x-height for small containers, ensures a clear legibility for consumers.

Regardless of the interest of such font sizes and line spacing for legibility, these sizes and line spacing would not match the reality of the physical limits from the existing container sizes. The labels must feature more and more information, including GHS pictograms in defined sizes, leaving little space available for the text.

One direct consequence of the new requirements is that it becomes **impossible to fit several languages on a single label**, thereby limiting the free movement of substances and mixtures across the EU. A multilingual label allows a container/product to be ready to place on the market in as many countries as the number of languages available, whereas a single language label **requires relabelling of the container upon shipping, reducing flexibility, creating labour intensive relabelling, causing delays in supply chain, driving costs up etc.** This also has an impact on recyclability of the packaging materials and increases the use inks, glue, paper etc. In addition, the industry's analysis shows that a set of the national languages of a country or even a single language does not fit into a label in some cases e.g., Belgium, Finland.

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<sup>1</sup> [EUR-Lex\\_02011RJ\\_69-201801\\_11 - EN - EUR-Lex /eur-lex.eu](#)



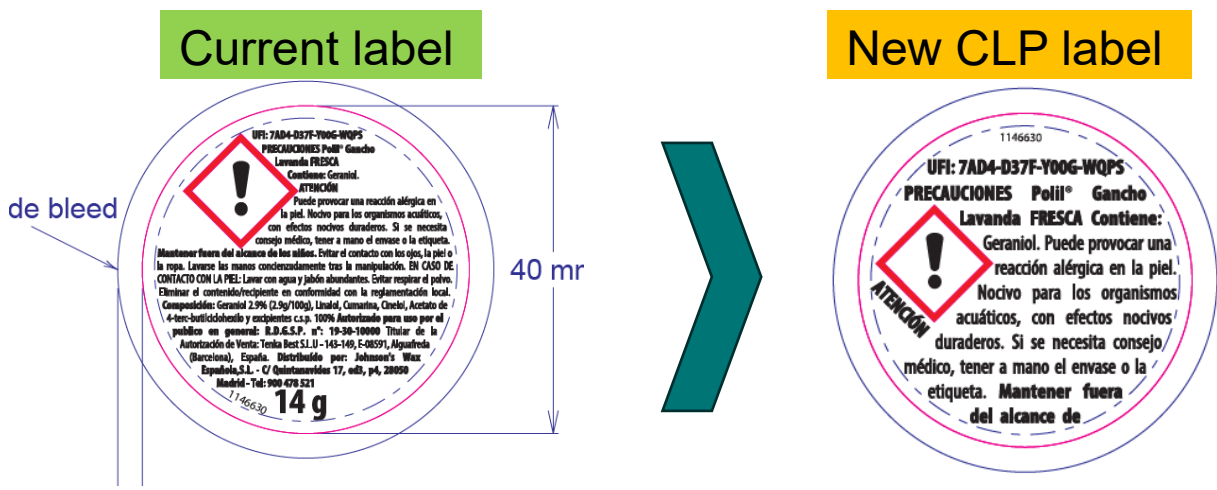
➤ **Fold-out labels**

We thank the Commission for opening up the opportunity to further use fold-out labels. However, fold-out labels are not always an ideal solution as these come with additional challenges and need to be procured externally from a specialized provider, whereas current labels allow being made-to-order at the site specifications. They are often a more costly labelling solution.

With fold-out label as the only choice to accommodate multilingual labels (or even single language labels in many cases) under the provisions set out in the new Annex I to CLP, **lead time** and **complexity** will soar, with risk of outdated labels and emerging **higher inventory costs**. Even for situations where fold-out labels would be a possibility, **the operating cost of such labels are estimated several fold higher than for the current labels** (regardless of any extra troubleshooting cost and one-off investments for filling lines). We also note that shipments are complexified, with for instance the impossibility to use Seawater-resistant paper (i.e. Good British Standard Section 2 & 3) for fold-out labels.

**ANNEX II – Label examples**

**1st Example : 1 Language - ES**



**CLP Rules**

- 1.2mm font size
- Leading space 120%

**Not fitting even 1 language**

**CUSTOMER INFO:**  
Please note - This text will not fit

los niños. Evitar el contacto con los ojos, la piel o la ropa. Lavarse las manos concienzudamente tras la manipulación. EN CASO DE CONTACTO CON LA PIEL: Lavar con agua y jabón abundantes. Evitar respirar el polvo. Eliminar el contenido/recipiente en conformidad con la reglamentación local. Composición: Geraniol 2.996 (2.9g/100g), Linalol, Cumarina, Cinetol, Acetato de 4-terc-butilhidroxifenilo y excipientes c.s.p. 100% Autorizado para uso por el público en general: R.D.6.5.P. n.º: 19-30-10000 Titular de la Autorización de Venta: Tenka Best S.L.U. - 143-149, E-08591, Alguafreda (Barcelona), España. Distribuido por: Johnson's Wax Española,S.L. - C/ Quintanaviejas 17, ed3, p4, 28050 Madrid - Tel: 900 478 521

**14 g**



## 2<sup>nd</sup> Example: Languages IT/HR

Current label



New CLP label



### CLP Rules

- 1.2mm font size
- Leading space 120%

**Not fitting even 1 language**

### CUSTOMER INFO:

Please note - This text will not fit

prodotto.Tenere fuori dalla portata dei bambini. **SC Johnson Italy S.r.l., P.le M.M. Burke 3 – 20044 Arese (MI) – Tel. 02 / 93371. Servizio Consumatori 8008-33032.** **Raid® Tarme protiv moljaca, miris Lavanda** Aktivni sastojak: Transflutrin 0.15% (0.15g/100g). Ako je potrebna liječnička pomoć pokazati spremnik ili naljepnicu. Čuvati izvan dohvata djece. **Orbico d.o.o., HR: tel. 01/3444-800; BIH: tel. +38733756000**

