SQUIRE PATTON BOGGS

Issuance of the 2025 Chemicals Package

EU – July 2025

The European Commission published on 8 July 2025 a **Chemicals Package**. The package is issued following a period of intense regulatory activity marked by the 2020 Chemicals Strategy for Sustainability. It reveals a change of approach, oriented towards **the reinforcement of the industry's competitiveness**.

Under the framework of the European Chemicals Industry Action Plan it introduces and announces a series of legislative proposals including:

- A Chemicals Omnibus simplification proposal and its Annex, simplifying the recently amended Regulation (EU) 1272/2008 on classification, labelling and packaging (CLP), the Cosmetics Regulation (Regulation (EU) 1223/2009 on cosmetic products) and the Fertilizers Regulation (Regulation (EU) 2019/1009)
- A proposal amending the CLP regarding dates of application and transitional provisions
- A proposal for a Regulation on the European Chemicals Agency (ECHA), aiming to strengthen its governance and financing
- The initiative follows months of exchanges between the Commission and interested stakeholders since the beginning of 2025. It constitutes the first step towards an **expected acceleration of the EU's chemicals agenda** marked by the upcoming issuance of **the proposal revising** REACH (Regulation (EU) 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals) at the end of the year.

European Chemicals Industry Action Plan

Building on the Competitiveness Compass and on the Clean Industrial Deal, the Commission's European Chemicals Industry Action Plan (ECIAP) is centered around four pillars.

"**Pillar 1: strengthening resilience**" aims to maintain critical productions in the EU. To do so, the Commission will build a Critical Chemicals Alliance by Q4 2025. It will be charged with a mapping of critical molecules, which would benefit from enhanced monitoring. In parallel, it will assist Member States and regions in the designation of Critical Chemicals Sites by 2026. Such sites would then be targeted for dedicated support and investment plans.

"**Pillar 2: securing affordable energy supply and supporting decarbonization**" addresses issues relating to energy costs, the obtention of permits and the industry's decarbonization efforts. Initiatives including the channeling of the EU's existing financing support, as well as support to the bioeconomy are foreseen.

"**Pillar 3: lead markets and innovation**" introduces measures to support innovation in the sector.

The Chemicals Omnibus is issued under "**Pillar 4: simplification**". Other initiatives under this pillar include an upcoming Environmental Omnibus by Q4 2025 (expected to notably target the EU's waste legislation), as well as the integration of simplification aspects in the upcoming revision of REACH.

Per- and polyfluoroalkyl substances (PFAS) are also considered in the plan, although the Commission does not commit to an adoption date for the generic restriction currently under examination by ECHA's committees. The Commission however announces support to research and innovation on alternatives including via targeted investments, the creation of an EU-wide PFAS monitoring framework and a public-private research initiative addressing PFAS detection and remediation by Q4 2026. Finally, the Commission will hold a dialogue with stakeholders in Q2 2026.

Chemicals Omnibus Simplification Proposal

The Chemicals Omnibus simplification proposal and annex (Chemicals Omnibus) aims to simplify via targeted amendments the requirements of the CLP, the Cosmetics Regulation and the Fertilizers Regulation.

The CLP: Marginal Amendments to the Labeling and Advertising Requirements

Revisions introduced in the recently amended CLP via Regulation (EU) 2024/2865 (CLP Revision) are already subject to certain modifications under the Chemicals Omnibus.

This includes a greater promotion of digital labelling and a toning down of the new formatting requirements introduced by the CLP Revision, considered to impose disproportionate economic and environmental costs notably for small packaging.

Rules on advertisement also see their scope reduced and would only apply to chemicals sold to the general public. Rather than being provided with additional information, the public is encouraged to read the label.

Finally, more flexibility is foreseen regarding the updating of labels in the event of new information on hazards. The fixed deadline for updating a label is withdrawn, replaced by a requirement to update without undue delay after the information has been obtained by or communicated to a supplier. This aims to solve issues faced by complex supply chains in the communication of information.

The Omnibus is accompanied by a dedicated proposal postponing the date of application of the concerned provisions of the CLP.

The Cosmetics Regulation: A Re-focus On Risk-based Considerations

Amendments to the Cosmetics Regulation are marked by a pragmatic approach placing risk at the center of considerations again.

In the current state of the Cosmetics Regulation, the use of substances that are classified as carcinogenic, mutagenic or reprotoxic (CMR) category 1 (known) or 2 (suspected) under the CLP in the composition of cosmetic products is prohibited. The amendment brings about pragmatism in the application of such principle, by exempting from the immediate ban substances that are classified solely in the context of exposure by inhalation or ingestion, as well as natural complex substances having a CMR component but not classified as CMR themselves. Where such substances present a risk however, the Commission shall seek the obtention of an opinion from the Scientific Committee on Consumer Safety (SCCS).

The proposal further streamlines the criteria for the obtention of derogations from the ban for products containing CMR 1A and 1B substances and details the condition under which an alternative can be considered available.

Further flexibility is also granted to companies with the introduction of transition periods during which a product containing a CMR can still be placed on the market to account for the companies' necessary delay of adaptation.

Finally, the proposal provides administrative simplification, through the introduction of a defined procedure for the inclusion of new colorants, preservatives and UV filters in the positive lists of Annexes IV to VI and the removal of the pre-notification obligation for products containing nanomaterials.

The Fertilizers Regulation: Registration Streamlining And Digitalization

The foreseen reforms are designed to streamline registration, speed up microorganism assessments, and further utilize digitalization under the Fertilizing Products Regulation.

One major change is to remove the need for all substances used in EU fertilizing products to be subject to extended REACH requirements, regardless of their quantity. This alignment with the ordinarily applicable REACH registration requirements should substantially reduce administrative and testing costs.

The commission would also be empowered to adopt general criteria and methodology for the assessment of microorganisms used in plant biostimulants. This would allow manufacturers and notified bodies to verify the safe use of these constituents, rather than having them included in the commission's positive list.

The changes will also aim to achieve further digitalization of the information and reporting obligations under the Regulation (e.g. by drawing up Declarations of Conformity in electronic forms, the addition of a digital contact and reporting in electronic form only).

ECHA Basic Regulation

ECHA, established by REACH, is set to undergo substantial changes under the presented Chemical Package. The proposal for a Regulation on the European Chemicals Agency is driven in particular by the new responsibilities that ECHA will assume following the adoption of measures under the "One substance, One assessment" framework.

The initiative introduces a single, overarching regulation to govern the agency, replacing the currently fragmented legal framework. This reform aims to centralize ECHA's expanding responsibilities and align its operations with the "Common Approach" for decentralized EU agencies, thereby promoting more coherent and sustainable oversight. As part of this effort, the administrative structure will be explicitly clarified, with detailed provisions outlining the composition and mandates of ECHA's core bodies: the Risk Assessment Committee (RAC), the Socio-Economic Analysis Committee (SEAC), the Member State Committee (MSC), the Biocidal Products Committee (BPC), the SCCS and the forum. Together, these refinements are intended to establish clear and consistent operational parameters across the agency. Concurrently, the proposal introduces far-reaching amendments to existing sectoral union legislation, including the deletion of numerous provisions in cornerstone regulations such as REACH and the Biocidal Products Regulation (Regulation (EU) No 528/2012), reflecting a reallocation of tasks and a streamlining of legal responsibilities. Notably, a new Article 75a is proposed for the Biocidal Products Regulation, formally empowering the SEAC to assess the socio-economic impacts relevant to the approval or renewal of biocidal active substances, thereby institutionalizing a cross-committee collaboration.

The proposal also outlines a clear and transparent framework for the delegation of powers to the European Commission, including time-limited mandates, renewal conditions and robust oversight mechanisms by the European Parliament and the Council.

Financial governance is set to be modernized through the abolition of segregated budget lines in favor of a unified annual union contribution, as well as the creation of a limited financial reserve to buffer against income volatility. Finally, the proposal seeks to reinforce overall accountability and transparency by fully integrating ECHA into the union's anti-fraud framework and establishing a detailed board of appeal procedure to provide stakeholders with a formal avenue for contesting agency decisions.

Next Steps

The Chemicals Omnibus, as well as the proposal for a regulation on ECHA and the proposal amending timelines under the CLP will be subject to examination by the European Parliament and the Council in the coming months, under the ordinary legislative procedure.

The presentation of the package to the European Parliament already suggests the appearance of two blocks: a left block (political parties – Renew, Greens, S&D and the Left) critical of the Chemicals Omnibus notably of amendments to the Cosmetics Regulation and a right block (political parties – EPP, ESN, ECR and PfE) welcoming a relief for the sector. More clarity on each group's and Member State's positioning can be expected in the coming weeks.

In the next months, each institution will propose amendments to the text. In this regard, the months to come are key for any interested actor in the sector to submit it input to the representatives of the two institutions.

Contacts

Thomas Delille
Partner, Brussels
T +32 2 627 1104
E thomas.delille@squirepb.com

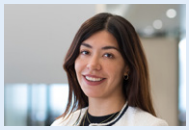
Gerard McElwee
Partner, Brussels, Belgium
T +32 2 627 7628
E gerard.mcelwee@squirepb.com

Peter Sellar
Partner, Brussels, Belgium
T +32 2 627 1102
E peter.sellar@squirepb.com

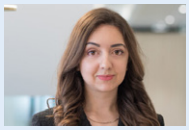
Manon Ombredane
Legal Director, Brussels
T +322 627 1134
E manon.ombredane@squirepb.com

Aodhan McGourty
Senior Associate, Brussels
T +322 627 1139
E aodhan.mcgourty@squirepb.com

Valerio Giovannini
Associate and Public Policy Advisor, Brussels
T +32 2 627 1104
E valerio.giovannini@squirepb.com



Nayelly Landeros Rivera
Associate, Brussels
T +322 627 1115
E nayelly.landerosrivera@squirepb.com



Maria-Magdalena Markova
Associate, Brussels
T +322 627 7644
E maria-magdalena.markova@squirepb.com

Elise Van Gerven
Associate, Brussels
T +322 627 1136
E elise.vangerven@squirepb.com

Marie Escornebouea
Associate, Brussels
T +32 2 627 76 22
E marie.escornebouea@squirepb.com