

CLP Simplification Position

Introduction

We welcome the Commission proposal to simplify the CLP Regulation, as it achieves the much-anticipated reduction of burden for economic operators, while maintaining a high level of consumer and environmental protection. EuroCommerce will thus like to express support:

a) for the EU Commission proposal as it currently stands;

b) for “stopping the clock” using the urgency procedure.

Advertisements

We support the current Commission proposal on a warning statement for advertisements instead of full hazard information, as consumers benefit from access to full hazard information already at the point of purchase—whether in-store or online. Presenting full hazard information in advertisements would thus be of no added value, and would rather be significantly burdensome and impractical across different formats (e.g. leaflets, radio or online).

Labelling

We support the current Commission proposal on labelling requirements, as the provisions under the current CLP will cause significant challenges for multilingual packaging, impact retail competitiveness, and logistical feasibility. When it comes to colour contrast requirements, we recommend for the legal text to ask for **sufficient visual contrast instead of defining the colours**. **ECHA guidance** can offer examples and assist with implementation.

Transition Period for Self-Classifications

Transition periods are critical for the sector because they allow supply chains to adapt without causing disruption, financial loss, or unnecessary waste. The current 6-month transition period is too short for complex supply chains and SMEs to adjust packaging, coordinate logistics, and clear stock. We recommend extending this to **18 months**, in line with ATP practice, **counting anew for each supplier**, to ensure smoother implementation.

Fuel Stations

We support the Commission proposal on fuel stations, as the current provisions are impractical, and will cause significant logistical, technical and economical challenges.

Consumers vs. Professional Users

We support the Commission proposal on differentiating the provisions on advertisements and distance sales based on whether those are intended for consumers vs professional users. Recognizing this distinction allows for more proportionate and effective regulation without imposing unnecessary burdens. Professional targeted offers/advertisements often use dedicated channels that are not accessible or relevant to consumers. Moreover, **ECHA guidance can play a key role in clarifying implementation**, helping authorities and businesses apply the distinction consistently and effectively.