



ENVI Committee Chair, MEP Antonio Decaro
ENVI EPP Coordinator, MEP Peter Liese
ENVI S&D Coordinator, MEP Tiemo Wölken
ENVI ECR Coordinator, MEP Alexandr Vondra
ENVI Renew Coordinator, MEP Pascal Canfin
ENVI Greens/EFA Coordinator, MEP Sara Matthieu

Brussels, 22 September 2025

Subject: Adoption of the CLP stop-the-clock proposal

Dear ENVI Chair and ENVI coordinators,

On behalf of industry associations ranging from paints to adhesive and sealants, we ask the Environment Committee of the European Parliament to swiftly adopt the European Commission's proposal to delay the application of the Classification, Labelling and Packaging Regulation (CLP) labelling requirements (COM(2025)0526), also referred to as the 'CLP stop-the-clock' proposal, using the simplified procedure.

The swift adoption of the CLP stop-the-clock proposal through the simplified procedure would provide industry with better legal certainty and predictability for investments while the details of the Chemicals Omnibus (COM(2025)0531) are under discussion. Legal certainty is crucial to:

- **Avoid premature and potentially unnecessary investments:** Companies must make major investments to comply with the labelling, advertisement and distance sales requirements, and their investment decisions heavily rely on the new requirements' dates of application. If their application is not stopped quickly, companies will be obliged to start investing to meet the initial deadlines on 1 July 2026 for label updates, advertisement and distance sales and 1 January 2027 for label formatting rules requirements. Such investments could end up being redundant depending on the outcome of the Omnibus negotiations.

Businesses can ill afford these potentially unnecessary expenses in the current economic environment, where investments are carefully considered and targeted.

- **Prepare for possible legislative changes:** The adoption of the CLP stop-the-clock proposal would safeguard industry preparedness should co-legislators decide on different labelling, advertisement and distance sales requirements under COM(2025)0531. In this case, industry must have adequate time to adjust and resume investments in the Single Market.
- **Preserve fair competition:** Clarity on the application date is essential to preserve fair competition across the industry. Legal uncertainty around the labelling rules risks creating uneven conditions for market participants, depending on their compliance timeframe. A swift postponement would ensure that all companies operate under the same expectations and timelines to maintain a level playing field.

To prevent companies from having to make potentially redundant investments to achieve requirements that are currently being simplified, we call on the Environment Committee to fast-track the approval of the Commission's CLP proposal.

Thank you in advance for your consideration.

Yours sincerely,



AmCham EU



AISE, The International Association for Soaps and Detergents



Atiel, The Technical Association of the European Lubricants Industry



Cefic, The European Chemical Industry Council



CEPE, The European Council of the Paint, Printing Ink, and Artist's Colours Industry



Cosmetics Europe, The Personal Care Association



CropLife Europe



DUCC, The Downstream Users of Chemicals Co-ordination Group



EFCC, The European Federation for Construction Chemicals



FEA, The European Aerosol Federation



FECC, The European Association of Chemical Distributors



FEICA, The Association of the European Adhesive and Sealant Industry



IFRA, The International Fragrance Association



I&P Europe - Imaging and Printing Association