



Navigating the EU landscape

General context – Simplification (I)

The European Commission is dedicated to **strengthening EU competitiveness and growth** while upholding high standards and achieving economic, social, and environmental goals.

For this, it aims to **streamline rules** and **reduce the administrative burdens for businesses by 25%**, and **by 35% for SMEs** by the end of this mandate (2029).

The 25% reduction target will translate to 37.5 billion savings for businesses.



General context – Simplification (II)



BUT...

Regulatory burden continues to have a significant impact on EU businesses. Regulatory burden, in addition to the cost of energy, represents a significant challenge to long-term investment in the EU.

Whilst the recent introduction of several simplification omnibuses and the subsequent adoption of some of these is to be welcomed, there is **still much more to be done** to provide the European economy with the simplification boost it needs and to come close to the promised reduction of regulatory burden.

Product Liability

Directive (EU) 2024/2853 (November 2024)

Application: **9 December 2026**.

It modernises Directive 85/374/EEC fitting modern age: artificial intelligence (AI), new circular economy business models and new global supply chains.

Any natural person who suffers damage (**death or personal injury, damage to or destruction of property**) by a defective product is entitled to **compensation**.

When a manufacturer of a product is established outside the EU, **the importer of the defective product can be held liable for damages**.



Not yet transposed in Spain.

Corporate Sustainability Reporting Directive (CRSD)



Simplification Omnibus I - CRSD

Application delayed to **2028** ('stop-the-clock' **Directive (EU) 2025/794**)

Simplification: **Directive (EU) 2026/470** (February 2026).

The agreement simplifies the directives on corporate sustainability reporting (CSRD) by reducing the reporting burden and limiting the trickle-down effect of obligations on smaller companies.

New thresholds: **1,000 employees and €450 million net turnover** to alleviate the reporting burden on undertakings.

Corporate Sustainability Due Diligence (CS3D)



Simplification Omnibus I – CS3D or CSDDD

Application delayed to **2028** ('stop-the-clock' **Directive (EU) 2025/794**)

Simplification: **Directive (EU) 2026/470** (February 2026).

While the CS3D's scope was not covered by the Commission's proposal, the final text increases the **thresholds to 5,000 employees and €1.5 billion net turnover**.

Deforestation(-free Products) Regulation (EUDR)

Targeted simplifications – EUDR

EUDR ensures that products placed on the EU market – including key ingredients such as palm oil, cocoa, soy, and rubber – are not linked to deforestation or forest degradation.

Simplification: **Regulation (EU) 2025/2650** (December 2025).

A one-year postponement (30 December 2026) for all businesses.

Downstream operators and traders will no longer need to carry out due diligence or submit due diligence statements (DDS), nor to pass on the reference numbers further in the supply chain.

Only the first downstream operator or trader (SME or not) **will collect and keep DDS reference numbers or declaration identifiers.**



Carbon Border Adjustment Mechanism (CBAM)



Simplification Omnibus I - CBAM

Simplification: **Regulation (EU) 2025/2083**

De minimis exemption: **50 tonnes** per importer and per calendar year.

CBAM definitive period started on **1 January 2026**.

More information: https://taxation-customs.ec.europa.eu/carbon-border-adjustment-mechanism_en



CBAM scope extension to downstream products: From 1 January 2028, CBAM scope would expand to include specific steel and aluminium-intensive downstream products, like machinery and appliances, but **finished aerosol products are not included!**

Ecodesign Requirements for Sustainable Products



« *Sustainable products should be the norm, not the exception* »

First Ecodesign for Sustainable Products and Energy Labelling Working Plan 2025-2030 (April 2025)

Intermediate products: **Iron & Steel** and **Aluminium** are included.

Detergents, paints and lubricants are not included, because they have lower impacts and lower improvement potential. Cosmetics not mentioned.

New study re product group 'chemicals'

Disclosure of information on unsold consumer products: Exemption for micro and small enterprises and delay for medium-sized enterprises (19 July 2030).

Green Claims

March 2023: Proposal for a Directive on substantiation and communication of explicit environmental claims (**Green Claims Directive**).

The dossier has been **blocked since June 2025**... but officially pending.



But **Empowering Consumers Directive (EU) 2024/825** will apply from **27 September 2026**. Spain missed the transposition deadline. The European Commission opened formal infringement proceedings in May 2026.

Ambient Air Quality & NECD

Ambient Air Quality Directive (AAQD) (EU)
2024/2881 (November 2024)

Application: **12 December 2026**.

National Emission reduction Commitments Directive (NECD). Evaluation shows EU clean air policy works, but further efforts needed.



Revision of the **UN Gothenburg Protocol** under the **UN Air Convention** (UNECE Convention on Long-range Transboundary Air Pollution): In preparation.

Annex XI on the VOC limits for certain products is still **sufficiently effective and relevant**. Retaining, removing or otherwise rearranging this Annex would then be a political decision.

Fluorinated Greenhouse Gases

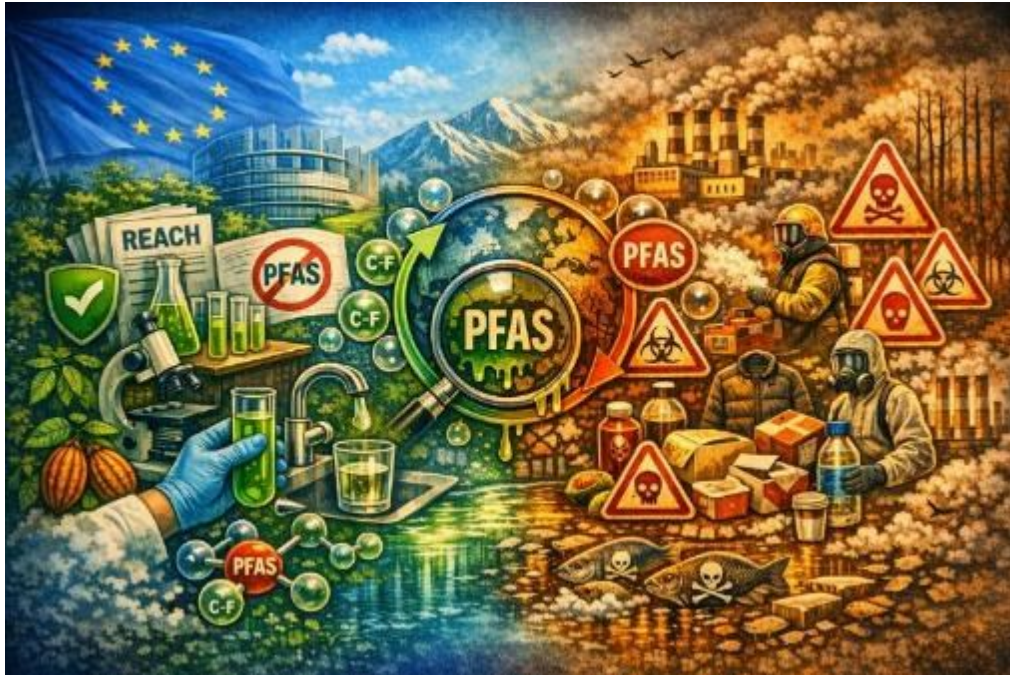
Simplification Omnibus IV

Article 20(4)(a) currently requires all importers and all exporters of products and equipment to register in the F-gas Portal.

Proposal to **remove the registration requirement for exported products and equipment**, except if it concerns exports of certain products and equipment with F-gases having a Global Warming Potential of 1000 or more that are subject to an export restriction.



PFAS restriction under REACH



Derogation 5.j - Propellants for **technical aerosols** for applications **where non-flammability and high technical performance of spray quality are required** until **13.5 years after entry into force**.

The derogation does not apply to products intended for entertainment and decorative purposes for the general public,

Derogation 5.kk - Propellants in **pressurized metered-dose inhalers (pMDIs)** until **6.5 years after entry into force**,

ECHA RAC opinion: No derogation!

ECHA SEAC draft opinion. Alignment with F-gases III Regulation. Inclusion of definition (technical aerosols). Keeping a temporary derogation. Final opinion expected by end 2026.

Nitrous Oxide (N₂O)



Commission **Delegated Regulation (EU) 2025/1222 (CLP)** includes the new harmonised classification and labelling of nitrous oxide (N₂O).

Index No	Chemical name	EC No	CAS No	Classification		Labelling			Specific Conc. Limits, M-factors and ATE	Notes
				Hazard Class and Category Code(s)	Hazard statement Code(s)	Pictogram, Signal Word Code(s)	Hazard statement Code(s)	Suppl. Hazard statement Code(s)		
007-031-00-9	Dinitrogen oxide	233-032-0	10024-97-2	Repr. 1B STOT SE 3 STOT RE 1 Ozone 1	H360Df H336 H372 (nervous system) H420	GHS08 GHS07 Dgr	H360Df H336 H372 (nervous system) H420			

Application: **1 February 2027**.

The EC REACH Committee adopted EC Regulation including a **derogation for food aerosol dispensers!** Review within 3 years.

But **EFSA re-evaluation** of N₂O as food additive is pending.

Detergents



Directive (EU) 2026/405 (March 2026)

Application: **23 September 2029.**

- Animal Testing Ban
- Microbial Products
- Digital Product Passport
- Refill & Online Sales
- Stricter Biodegradability

Cosmetic Products Regulation (CPR)

Simplification Omnibus VI – CPR

Simplification: Trilogue

CPR revision?

EC evaluation: Q4 2026



REACH Regulation

REACH targeted revision

Commissioners Roswall and Séjourné have concluded to not open REACH at this point. But they are looking into ways of simplification and modernisation through ATPs.

The revision would address:

- Simplification
- PFAS
- Generic Approach to Risk Management (GRA) ??
- Restriction / Authorisation of substances ??
- Essential Use ??
- Mixture Assessment Factor (MAF) ??
- Polymers Requiring registration (PRR) ??
- Use and exposure information ??



Classification, Labelling and Packaging (I)



Regulation (EU) 2024/2865 (November 2024)
but...

Simplification Omnibus VI - CLP

Regulation (EU) 2025/2439 postpones application of the amended CLP to 1 January 2028.

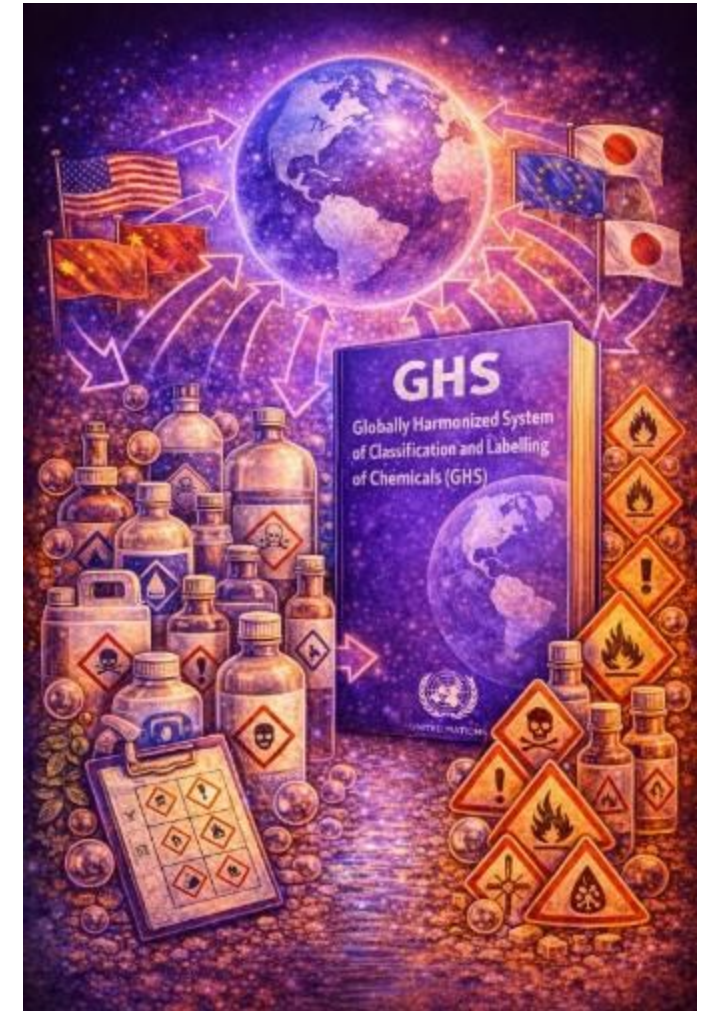
Simplified provisions : EP tabled again labelling formatting provisions. Trilogue,

Classification, Labelling and Packaging (II)

UN Sub-Committee of Experts on the Global Harmonization System (GHS):

Revised Chapter 2.3 on aerosols in **GHS Rev. 11, 2025**
No practical impact!

Next **CLP ATP** will already include the new GHS provisions!



Critical Chemicals Alliance (CCA)

The Critical Chemicals Alliance tackles key issues facing the chemical sector, such as risks of closures and trade challenges, and supports the modernisation and investments in critical productions.

However chemical manufacturers push hard several policy options such as end-market levy (ECRI), tradeable certificates, (Carbon Utilisation Trading System) and similar carbon Extended Producer Responsibility (EPR) schemes.

→ Transfer transition costs to downstream users.

DUCC opposes these policy options.



Packaging & Packaging Waste (I)



Packaging and Packaging Waste Regulation (PPWR) (EU) 2025/40 published (January 2025)

CEN DfR Standards re plastics: published

CEN DfR Technical Specifications re all other materials: to be published by end 2026

Waste Sorting Labels (Implementing Act by 12 August 2026)

Recyclability Performance Grades (Delegated Acts by 1 January 2028)

Packaging & Packaging Waste (II)

An aerosol with integrated components only (no cap)



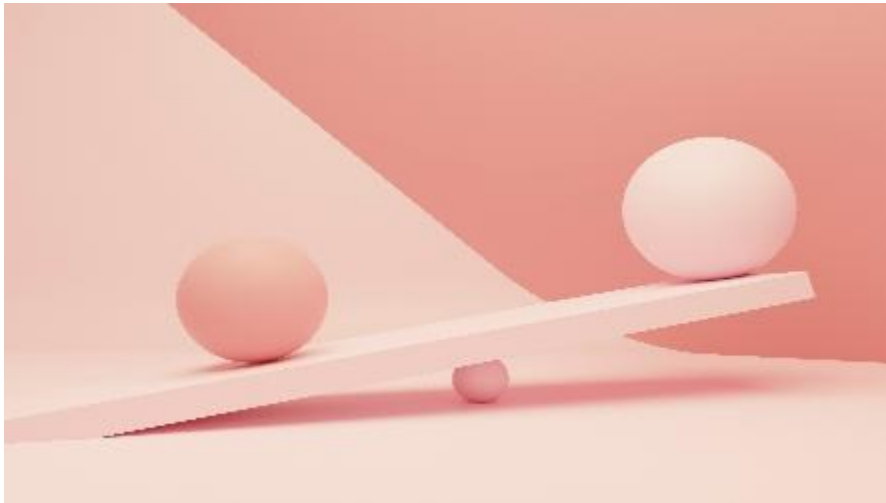
Metal components which will be recycled



Non-metallic components which will not be recycled



Packaging & Packaging Waste (III)



Ratio issue!

Small vs big capacities

Less aluminium is used for smaller aerosol can capacities. The approach penalises small capacities, such as the nomad or promotional versions

Innovative lightweight aerosol can vs traditional aerosol can

Less aluminium is used for innovative lightweight aerosol cans. The approach penalises innovative lightweight aerosols which are those using less material and with the smallest carbon footprints

Recyclability Performance Grades

Calculation unknown

BUT

beyond the relative mass of components additional 'malus' factors will be included

→ A '**safety margin**' is needed beyond the 70% for 2030 and 80% for 2038 (mass only).

Transport of Dangerous Goods

UN Sub-Committee of Experts on the Transport of Dangerous Goods:

Differentiation between UN1950 and UN2037. Guidance from industry group.

UN Joint Meeting:

'Retail' / 'last mile' deliveries. Further discussion.

Thank you, Volker Krampe!



Aerosol Dispensers

Adaptation to technical progress of the Aerosol Dispensers Directive re **plastic aerosols**.

FEA **Code of Practice on PET aerosol dispenser recyclability in the EU**.

New EC safety study for **PET container including PCR** launched.





Muchas gracias por su atención.

¿Tiene alguna pregunta?