

Regulatory Digest H1 2025

July 2025 Issue

Global Compliance Watch: Trends, Alerts & Actions

Global Regulatory

Landscape: Key Updates & What's Ahead

Across the EU, a wave of regulatory reform is reshaping how we label, package, and position our products. Major initiatives — including the revised CLP Regulation, new Toy Safety regulations, EU-wide packaging waste harmonisation, and the Green Claims Directive

Driving Impact together

Shaping regulation through strategic partnerships

Safety Alert Snapshot

RAPEX highlights H1 2025



Navigating Regulatory Change: What You Need to Know

Cris Cosgrave, Group Regulatory Director

As we close the first half of 2025, here are key regulatory developments relevant to our products and markets. These updates may impact formulation, packaging, claims, or compliance monitoring across our brands.

Key areas include the ongoing revision of the European Classification, Labelling and Packaging (CLP) Regulation, a new Toy Safety Regulation proposal, the upcoming harmonisation of packaging waste rules under the Packaging & Packaging Waste Regulation (PPWR), and the Green Claims Directive, which sets new requirements on environmental messaging. These updates will shape how we formulate and label our products, substantiate sustainability claims, manage raw and packaging materials, and ensure continued market access — particularly for categories such as children's arts materials, and professional artist supplies.

Below is a summary of the most relevant updates for Colart.

1. EU CLP Revision – Implications for Labelling and Formulations

The EU is revising the CLP Regulation to introduce new hazard classes, including endocrine disruptors (ED), persistent/bioaccumulative substances (PBT/vPvB), and persistent, mobile and toxic substances (PMT/vPvM). New requirements also include physical label formats.

2. Packaging & Packaging Waste Regulation (PPWR) – Harmonisation of Waste Rules

The PPWR introduces EU-wide rules to reduce packaging waste, including mandatory reuse targets, minimum recyclability standards, and harmonised labels across member states. For operations, this may affect supplier choices, recyclability claims, and how secondary packaging is handled. It also opens an opportunity to innovate towards circular packaging solutions that align with both compliance and brand values. Further clarifications is waiting to be published by Q3 2025 to further do a full assessment and communication to the wider business.

3. EU Green Claims Directive – New Rules for Sustainability Messaging

To combat greenwashing, the EU will soon require that environmental claims (e.g., "eco-friendly", "carbon neutral", "biodegradable") be supported by scientifically verifiable evidence and subject to third-party verification before use. This regulation will influence on-pack messaging, web content, and marketing claims across all brands. Commercial and marketing teams should prepare to substantiate claims and consider claim audits across product lines.

Latest update however, The European Commission plans to withdraw the Green Claims Directive due to insufficient parliamentary support, putting stricter environmental marketing rules on hold.



EU Toy Regulation Update

The upcoming EU Toy Safety Regulation is set to replace the existing directive and will apply directly across all EU Member States without the need for national transposition. Its official publication and entry into force are expected by December 2025, followed by a transitional period of 54 months, leading to full enforcement in Q2 2030.

Key regulatory changes include stricter chemical restrictions and the introduction of a Digital Product Passport for each toy, which will replace the current Declaration of Conformity. These changes will have a significant impact on the formulations of core LB Infant products, triggering the need for:

- Reformulation of affected products
- Additional toxicological and safety testing
- Enhanced documentation and traceability across the supply chain

Early planning and alignment has commenced with key stakeholders (Brand, Procurement and R&D) to ensure continued market access and product compliance.

Shaping Policy Through Partnership

EU EU CLP Simplification

Colart collaborated with CEPE (European Council of the Paint, Printing Ink and Artists' Colours Industry) and FIPEC (Fédération des Industries des Peintures, Encres, Couleurs, Colles et Adhésifs) to co-author position papers and contribute policy input on the proposed EU CLP revision. Our efforts focused on advocating a practical approach specifically on font formatting rules and advertisements definition. This collaboration helped shape a more balanced proposal that maintains robust hazard communication while protecting sensible operational and sustainable from the business view point.

Latest update: The Commission has endorsed and proposed a simplification measure that supports our position, marking a significant success to our efforts. 😊

us US State-Level Chemical Bans

In the US, Colart worked with ACMI (Art and Creative Materials Institute) to engage with state-level regulatory proposals, particularly a planned substance ban in Minnesota that posed a threat to several of our professional SKUs. Through coordinated industry lobbying and evidence-based advocacy, we supported the successful inclusion of an exemption for professional art materials — preventing unnecessary product restrictions and preserving creative access for artists.

These collaborations highlight the critical importance of early engagement and collective action in shaping a regulatory environment that supports both compliance and innovation.



Several paints including cosmetic paints, and water colour toy paints — were flagged in the RAPEX Safety Gate system for non-compliance due to excessive levels of heavy metals, the presence of microplastics, and incorrect or missing labelling.

These alerts reflect an increased enforcement focus on products intended for children, where safety standards are applied with greater stringency.

RAPEX serves as a useful benchmark, highlighting which national authorities are most active in market surveillance and more likely to take enforcement action. For Colart, this underscores the importance of maintaining rigorous compliance across our children's and hobby product ranges, with particular attention to formulation transparency, traceability, and safety documentation.

For more details on published non-compliant products, you can access the full RAPEX report below

[Children's nail art set, Feb 20,2025](#)

[Water Colour Set, May 8,2025](#)

[Water colour \(Children's Product\) July 3,2025](#)