

# 2025 Calendar of the main European regulatory deadlines

# January

- Ban on mineral oils in packaging and printed paper
- Mandatory display of QCEs
- Marketing: New requirements for: Homosalate (UV filter), Triclocarban and
- Triclosan (preservatives)

# **February**

Marketing: New requirements to be met for: Genistein, Daidzein, Acid Kojique, Arbutine, α-arbutine and Hydroxyapatite [nano] + 5 nano prohibited by Omibus nano

# **April**

**R-nano**: end of 2025 reporting period for 2024 activities

# May

Methylbenzylidene camphor (UV filter) banned from the market

Non-compliant products placed on the market before this date must be withdrawn from the market by May 1st 2026.

### July

Withdrawal from the market of products containing Homosalat which does not comply with the new requirements

# September

Prohibition of the substances **DIMETHYLTOLYLAMINE and TRIMETHYLBENZOYL DIPHENYLPHOSPHINE OXIDE** 

### October.

Labelling obligation for <u>microplastics</u> corresponding to criterion 5B

## November

- Withdrawal from the market of products that do not comply with the new requirements: Omnibus nano, Genistein, Daidzein, Kojic acid, Arbutin, α-arbutin, Triclocarban and Triclosan
- New maximum concentration for Vitamin A (Retinol and derivatives)
- + Labelling phrase to be included on packaging

Non-compliant products placed on the market before this date must be withdrawn from the market by 01/07/2027

### December

Anti-deforestation regulation (EUDR) comes into force





# Ban on mineral oils in packaging and graphic paper Art. 112 AGEC Law ••

# January 1st 2025

Ban on the use of mineral oils:

- For MOAHs, when the mass concentration in the ink of these substances is > 0.1% or the mass concentration in the ink of compounds with 3 to 7 aromatic rings is > 1ppm;
- For MOSH, when the mass concentration of these substances in the ink is >0.1%.

# Disposal of stocks until January 1st 2026

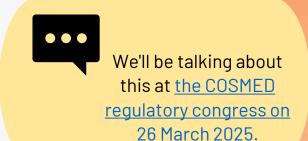
For packaging and printed paper manufactured or imported before January 1<sup>st</sup> 2025.



Further information: FR - AGEC Law - Article 112: Mineral oils



# Environmental Qualities and Characteristics (EQC) Art. 13 AGEC Law<sup>11</sup>



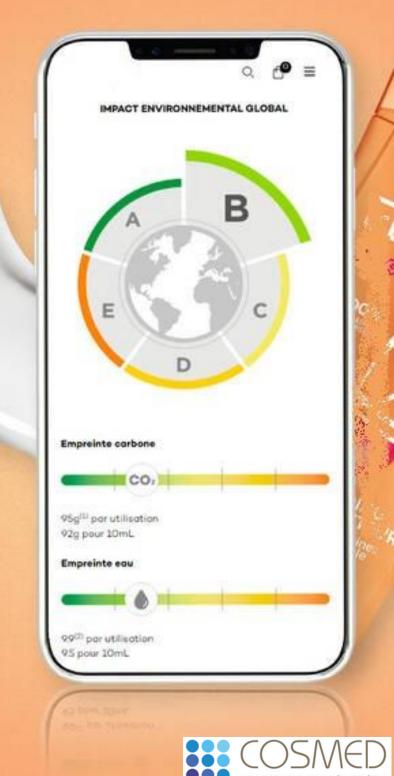
# Compulsory <u>electronic</u> posting

From January 1<sup>st</sup> 2025, the dematerialised display of ECQs will be compulsory for companies:

- with annual sales of > 10 million euros
- and placing at least 10,000 units of the products concerned on the market



Further information: FR - AGEC Law - Article 13: What obligations?



# Substances: details of 2025 maturity dates



### Homosalate (UV filter)

January 1<sup>st</sup> 2025: Use limited to face products (excluding sprays and aerosols) with a maximum concentration of 7.34%.

July 1<sup>st</sup> 2025: Non-compliant products withdrawn from the market

More information : EU - Regulation (EU) n°2022/2195



# Triclocarban, Triclosan (preservatives)

January 1<sup>st</sup> 2025: New concentrations and categories to be respected

- -Triclocarban: C° max 0.2%, prohibited in mouthwashes
- -Triclosan: C° max 0.3% in toothpastes (except for children under 3); soaps/shower gels; deodorants (except spray); face powders, foundations; nail cleansers for artificial nails.

November 1<sup>st</sup> 2025: Non-compliant products withdrawn from the market

More details: <u>EU - Regulation (EU) n°2024/996</u>



# Gensitein, Daidzein, Kojic acid, Arbutin, aarbutin

February 1<sup>st</sup> 2025: Limited use -Genisteine: C° max 0.007%.

- -Daidzeine: C° max 0.02
- -Kojic acid: C° max 1%, authorised only in face and hand products
- -Arbutin: C° max 7%, authorised only in face creams
- -α-arbutin: C°max 2"in face creams; C°max 0.5% in body lotions

November 1st 2025: Non-compliant products withdrawn from the market

More details: EU - Regulation (EU) n°2024/996



## **Nanomaterials**

February 1<sup>st</sup> 2025: End of the marketing of products containing nano substances that do not comply with or are banned by the Omibus nano (9 banned substances + 1 restriction, i.e. Hydroxyapatite [nano]).

November 1<sup>st</sup> 2025: Non-compliant products withdrawn from the market More information : EU - Regulation (EU) n°2022/2195



## 4-MBC (UV filter)

May 1<sup>st</sup> 2025: Filters BANNED, end of marketing of products containing them

May 1<sup>st</sup> 2026: Non-compliant products withdrawn from the market

More details : <u>EU - Regulation (EU) n°2024/858</u>



DIMETHYLTOLYLAMINE and TRIMETHYLBENZOYL DIPHENYLPHOSPHINE OXIDE September 1<sup>st</sup> 2025: End of the market and availability of these substances (withdrawal of products containing them from the market).

These substances, banned by Omnibus VII, are used in artificial nails and varnishes. More details: Omnibus VII



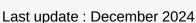
### Vitamin A

November 1st 2025: New maximum authorised concentrations

- -0.05% retinol equivalent in body lotions.
- -0.3% in other products.
- + Labelling phrase to be included on packaging 'Contains Vitamin A. Consider your daily intake before use'

May 1st 2027: Non-compliant products withdrawn from the market

More details : <u>EU - Regulation (EU) n°2024/996</u>





# **Annual declaration of substances in** nanoparticulate form in the R-Nano register Art. 112 AGEC Law

For manufacturing, importing and distribution activities The 2025 reporting period covers activities from January to December 2024.

File online from January 1st to April 30th 2025



Further information: FR - Annual declaration of substances in nanoparticulate form: R-Nano





/!\ Withdrawal of non-compliant products from shelves

PROHIBITION of microplastics in non-rinsed products (excluding make-up)
(maximum content 0.01%)

BAN on microplastics in make-up products (maximum content 0.01)



Further information: REACH - MICROPLASTICS REGULATION



# **EUDR** regulations

Application deferred to **December** 31<sup>th</sup> 2025

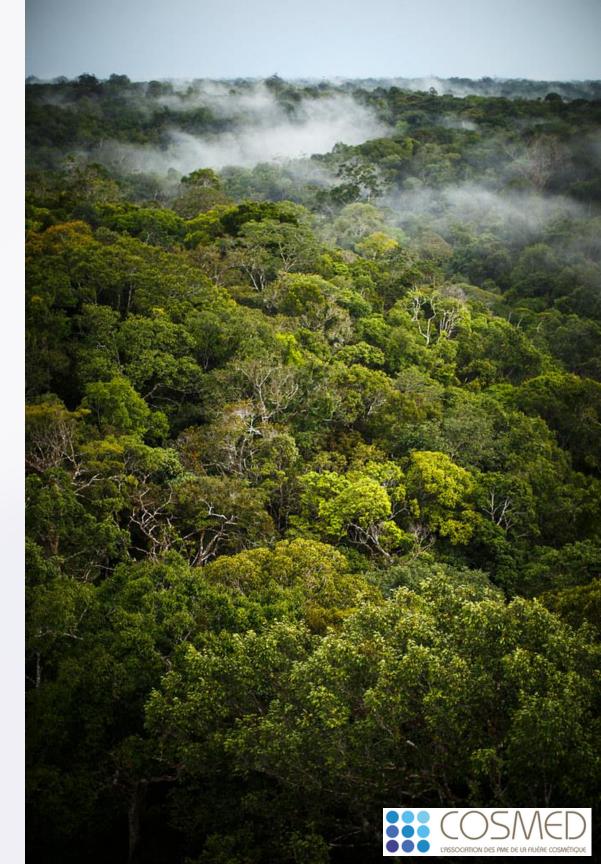
+ 6 additional months for VSEs/SMEs

Postponement = additional time to gather information

From the date of application:

- Manufacturers of the raw materials in question (*in particular palm and its derivatives, cocoa, coffee and soya*) will have an obligation to exercise due diligence and to collect, report and store information.
- Cosmetics manufacturers must ensure that the raw materials they use do not come from deforested land after December 31<sup>th</sup> 2020.

Further information: <u>EU - Regulation (EU) 2023/1115</u> + <u>Case studies with a checklist of obligations for each player</u>



# Get ready for the deadlines on NEW Allergens!

July 31<sup>th</sup> 2026

Entry into force of the regulation on the labelling of new allergens for the marketing of products

July 31<sup>th</sup> 2028

Entry into force for making products available and withdrawal of non-compliant products from the market.

Further information: <u>EU - Regulation (EU) No 2023/1545 on the labelling of new allergens - July 2023</u>



# Other long-term deadlines to be anticipated

1 lst May 2026 - Application of ATP 22 / Omnibus VIII

End of the placing on the market and making available on the market of substances classified as CMR by ATP 22 (including silver, unless they meet the conditions for exemptions which will then apply (case of hexyl salicylate, ophenylphenol and micrometric silver).

More info : EU CLP Regulation

July 31<sup>th</sup> 2026 - "Releases formaldehyde" statement

All products on the market containing preservatives that release formaldehyde must be labelled with the warning "Releases formaldehyde". This warning must appear whenever the total concentration of formaldehyde released exceeds 10 ppm. Products that do not comply with these provisions must be withdrawn from the market with effect from this date.

More info : <u>EU\_Regulation (UE) n° 2022/1181</u>

June 6<sup>th</sup> 2027 - Ban on silicones: D4, D5 and D6

Banned from the market and withdrawn from the shelves:

- rinsed products containing D6 when > 0.1% (for D5 in rinsed products this restriction already applies from 31/01/2020)
- unrinsed products containing D5 and/or D6 when >0.1%.

NB: D4 is already banned in cosmetics, but this will have an impact on its presence as an impurity in other silicones, whose content will be limited to 0.1%.

More info: REACH Restriction on silicones D5-D6 May 2024

January 2030 - Ban on styrenic compounds in packaging

Alignment between the Climate & Resilience Act and the EU PPWR regulation

More info: FR - Climate and resilience Act, article 23: Ban on styrenic packaging



Last update: December 2024

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