
Joint APEP-ECOFI proposal for Simplification of formatting requirements in the CLP Regulation for EU Fertilising Products

This proposal has been jointly developed by APEP and ECOFI. It highlights common priorities across different segments of the fertilising products sector, particularly regarding the workability of labelling rules and the need for simplification. Both organisations support this submission as a joint contribution to the Commission's ongoing efforts to streamline EU product legislation and reduce unnecessary burdens.

I - Legal Background:

Since 16 July 2022, the European fertilising products industry may place their products on the market according to [Regulation \(EU\) 2019/1009 \(FPR\)](#). The labelling requirements are laid down in Annex III of the FPR. Such legal requirements are accompanied by a [Frequently Asked Questions document](#) and a [Labelling Guidance Document](#).

[Regulation \(EU\) 2024/2516](#), amending the FPR, sets out rules for the voluntary digital labelling of EU fertilising products. This Regulation shall apply from 1 May 2027.

On 20 November 2024, Regulation (EU) 2024/2865 amending Regulation (EC) No 1272/2008 on Classification, Labelling and Packaging of substances and mixtures (amended CLP), was published in the Official Journal of the EU. The amended CLP notably sets out new mandatory formatting requirements, especially minimum font sizes, line spacing, and black-on-white text obligations.

When substances and mixtures are used in EU fertilising products, such CLP formatting requirements apply on the labelling of EU fertilising products.

II - Issues at stake:

In the context of the Commission's broader simplification strategy, we appreciate the opportunity to flag several issues stemming from the amendment of the above-mentioned regulations and propose the simplification of labelling requirements to ensure transparency, clarity, and competitiveness for the European fertilising products sector. Moreover, the accumulation of distinct and sometimes redundant labelling rules risks increasing packaging waste – through the need for larger or

multiple labels – and can drive up plastic usage, contributing to unnecessary environmental impacts, including increased plastic pollution.

For companies making fertilising products available to the end-user in the European Union, working with multilingual packaging is the most practical solution, especially taking into account Regulation (EU) 2025/40 on packaging and packaging waste. The latter sets clear boundaries on the use of packaging and recycling, and fertilising products' manufacturers are committed to upholding the principles of the Regulation in the best way possible. Although Regulation (EU) 2024/2516 introduces digital labelling provisions for EU fertilising products, and while these do not explicitly conflict with the amended CLP Regulation, overlapping and at times unclear obligations contribute to an increasingly complex labelling environment. The lack of coordination and alignment between different frameworks and the accumulation of diverse labelling obligations have made compliance significantly more burdensome.

Mandatory formatting requirements in the revised CLP Regulation:

Initially, the CLP Regulation only set requirements in relation to the dimensions of the label size and the pictograms. New formatting requirements were introduced with the revised CLP, which will have a significant impact on the layout of labels in the near future.

The amendment related to the font size and colour (points (2) and (3) of Annex I) shall apply from 1 January 2027.

Minimum dimensions of labels and pictograms and minimum font size			
Capacity of the package	Dimensions of the label (in millimetres) for the information required by Article 17	Dimensions of each pictogram (in millimetres)	Minimum font size (x-height in millimetres)
Not exceeding 0,5 litres	If possible, at least 52×74	Not smaller than 10×10 If possible, at least 16×16	1,2
Greater than 0,5 litres but not exceeding 3 litres			1,4
Greater than 3 litres but not exceeding 50 litres	At least 74×105	At least 23×23	1,8
Greater than 50 litres but not exceeding 500 litres	At least 105×148	At least 32×32	2,0
Greater than 500 litres	At least 148×210	At least 46×46	2,0

The text on the label shall have the following characteristics:

- (a) printed in black on a white background;
- (b) the distance between two lines shall be at least 120 % of the font size;
- (c) a single font that is easily legible and without serifs shall be used;
- (d) the letter spacing shall be appropriate for the selected font to be easily legible

The FPR and the Labelling Guidance Document for EU fertilising products do not set requirements regarding minimum font size for FPR-specific label elements. Where substances or mixtures classified under CLP are present, the CLP's formatting requirements apply only to the relevant hazard label elements. The FPR Labelling Guidance Document (paragraph 1.4) confirms that, outside these cases, font size decisions remain at the discretion of the manufacturer:

1.4. Is there a minimal/maximal size for the label/the font? Is there a proportional size to respect?
 The regulation does not establish any rules related to the size for the label/the font. It is up to the manufacturer to decide which size of the label to use, and ensure that information is clear, understandable, legible and intelligible.

III – Our Proposals in the context of the Commission's policy on simplification

To comply with the cumulative labelling obligations under the FPR, the amended CLP Regulation, and forthcoming digital labelling requirements, the European fertilising products industry requires greater flexibility to ensure continued, practical access to products for end-users. Due to limited packaging space for smaller packages – soon to be further constrained by the new CLP labelling requirements – manufacturers are increasingly forced to use additional fold-out labels or, where these cannot be affixed, to create separate packaging versions with fewer languages tailored to

specific country clusters. These outcomes run counter to the EU's goals of simplification, packaging reduction, and waste reduction.

III – a. Simplification Proposal: Amendment to Regulation (EU) 2024/2865 (Amended CLP)

- **Grant an exemption from the CLP mandatory formatting requirements for substances and mixtures used in EU fertilising products:**

The new provisions for digital and fold-out labels introduce additional complexity and increase costs for all manufacturers, distributors, and importers. The formatting rules are overly prescriptive – particularly regarding minimum font size, line spacing, and letter spacing. These requirements are unnecessary and impractical, as they would render existing label formats unworkable for most products and drastically reduce the number of languages that can appear on a single label, limiting flexibility. New or upgraded software and printing equipment would be required to meet these specifications. Additionally, some countries—such as Belgium and Finland—require multilingual labels, which already poses a challenge on smaller pack sizes. The new formatting restrictions would make compliance even more difficult, reducing the feasibility of multilingual labelling and limiting market access.

A legal exemption in the revised CLP could therefore be a way forward. Alternatively, the new formatting requirements could be removed from the legislative text and instead addressed in a non-binding guidance document. While clear, legible packaging is essential, labelling requirements must also be practical, cost-effective, and proportionate to the expected health and environmental benefits. Moving the formatting rules to guidance would allow them to serve as useful examples without imposing rigid legal obligations.

- **Align Implementation Timelines:**

To reduce transitional complexity, the application dates of the formatting requirements in the revised CLP Regulation (if maintained) and the digital labelling Regulation for EU fertilising products should be aligned and be simultaneously on 1 May 2027.

III – b. Additional Simplification Proposal: Amendment to the Digital Labelling Regulation for EU fertilising products:

While both the amended CLP and FPR now include provisions on digital labelling, these provisions have so far provided limited practical benefit and are not sufficient to address the overall complexity of the labelling requirements. Under the FPR, digital labels are limited to additional, non-essential information. In the case of CLP, all hazard information must still be physically present on the label, with digital tools allowed only for voluntary supplementary content. As a result, the potential of digital labelling to reduce burden remains untapped, while at the same time adding layers of legal and technical requirements.

Proposal: Amend the Digital Labelling Regulation for EU fertilising products to broaden the scope of information eligible for digital-only labelling. In particular, allow general labelling requirements – such as instructions for intended use, application rates, timing and frequency, and target crops or mushrooms – to be provided exclusively in digital form. In parallel, introduce the option for a physical leaflet as an alternative to digital labels, to offer a low-tech, practical solution that supports environmental and economic sustainability. The goal is to provide meaningful simplification and flexibility without compromising transparency or end-user accessibility.

This position is submitted jointly by:



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