



17 November 2023

Reiteration of the major negative impact on industry of the current CLP proposal as regards minimum requirements for labelling

Ahead of Friday's technical meeting to discuss the details regarding font sizes, we, the signatories of 9 European associations representing producers, product formulators (downstream users), distributors and end users of chemicals, would like to reiterate our comments with regard to minimum requirements for labelling.

Firstly, we welcome the decision to consider the concerns of industry and to keep an open mind going into the trilogue discussions regarding minimum font size requirements. In order to support your discussions, we would like to reiterate our concerns as outlined in our successive communications, such as our 05 September 2023 Cross-Sector Group letter and our analyses:

- Our [CEPE-funded scientific study](#) has highlighted that 1,2 mm is sufficient and there is no added value in increasing the font size to 1,4 mm
- This recommendation of 1,2mm is in line with the [ECHA guidance suggesting that 1,2mm is easily read](#)
- CEPE has also conducted an estimated impact assessment on the economic and financial, as well as environment, impacts of the increase in font size and the shift to fold-out labels.

In addition, we would urge the institution to launch a long-term, robust study regarding font sizes and other typographic variables, in order to develop robust guidance for the future regarding font sizes and legibility, in conjunction with sectoral and typographic experts.

We would also like to stress that we are happy to support, as previously stated, the institution however possible, and to reinforce the work that has been done to date and to help the institutions to achieve the goals of the EU Green Deal.

We look forward to hearing your response to the information provided, and to see what is done with the information and support provided by your industrial partners.

Signed,

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