



# 2024 CALENDAR OF REGULATORY OBLIGATIONS

 **January 1, 2024** **BHT & Acid Yellow3** **MARKET WITHDRAWAL**


End of the deadline for disposing of stocks of non-compliant products, the date from which non-compliant products must be withdrawn from the market. [More](#)

 **January 1, 2024** **French authorities** **SKILLS TRANSFER**


ANSM transfers its powers to ANSES and DGCCRF. [More](#)

 **January 1, 2024** **Environmental quality and characteristics (EQC) display** **APPLICATION**


Application of the obligation to display environmental qualities and characteristics for the 2nd tranche of companies concerned, with sales of over €20 million and more than 10,000 units of products on the market. [More](#)

 **January 1, 2024** **Mineral oils** **PROHIBITION**


This date marks the end of the stock clearance period for paper packaging and printed matter imported or manufactured before January 1, 2023 and not meeting the requirements of the AGECE Act. [More](#)

 **January 1, 2024** **Reused packaging** **OBJECTIVE**


The annual target of 6% reused packaging to be placed on the market applies from this date for producers declaring sales in excess of €50 million. [More](#)

 **January 1, 2024** **Descroizaille Law** **ENTRY INTO FORCE**


Coming into force of the Descroizaille Law on the control of promotions. From this date, supermarkets will no longer be able to offer promotions on hygiene and beauty products exceeding 34%. [More](#)

 **March 26, 2024** **Misleading environmental claims** **ENTRY INTO FORCE**


Entry into force of the Misleading Claims Directive to strengthen consumer protection against unfair practices and improve information. [More](#)

 **March 30, 2024** **IFRA 51** **ENTRY INTO FORCE**


Entry into force of IFRA 51 specifications and restrictions for new fragrance compositions. [More](#)

 **April 12, 2024** **Endocrine disruptors** **INFORMATION OBLIGATIONS**


From this date onwards, it will be compulsory to mention a product with known or suspected endocrine disruptors. [More](#)

 **July 30, 2024** **IFRA 51** **ENTRY INTO FORCE**

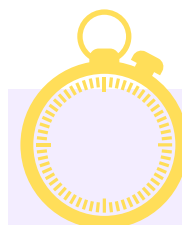
Entry into force of the IFRA 51 ban for fragrance compositions existing at the time of publication. [More](#)

 **July 31, 2024** **Formaldehyde releasers** **LABELING RULES**

New labelling rules apply to products containing formaldehyde-releasing preservatives. [More](#)

 **December 30, 2024** **Imported deforestation** **APPLICATION**

European regulation against imported deforestation comes into force. From December 30, 2024, it will be forbidden to place on the European market or import products that have contributed to deforestation or forest degradation. [More](#)



## OTHER PROVISIONS EXPECTED FOR 2024

Revision of the cosmetics regulation ; regulation amending annexes II, III, V, VI of the cosmetics regulation (4-MBC, retinol, vit A, arbutin, triclosan,...) ; REACH restriction on silicones...

Environment: eco-design regulation; green claims directive; revision of the misleading claims directive; packaging waste regulation; waste water directive

[More](#)

# 2024 CALENDAR OF REGULATORY OBLIGATIONS

## January 2024

### ▶ January 1st: Withdrawal from the market of non-compliant products containing BHT and/or Acid Yellow 3

**Compliance with the restrictions of Regulation (EU) no. 2022/2195 of November 10, 2022 concerning the use of HOMOSALATE (applicable in 2025), BHT (2024), Acid Yellow 3 (2024), HAA299 and Resorcinol (already applicable) in cosmetics.**

Annexes III and VI of Regulation (EC) No. 1223/2009 have been amended by this regulation to reflect the conclusions of the SCCS regarding these substances. Products are considered non-compliant if they do not respect the following restrictions:

- BHT :
  - Mouthwash : 0,001%
  - Toothpastes : 0,1%
  - Other products (rinsed and non-rinsed) : 0,8%
    - Acid Yellow 3 :
  - Non-oxidizing hair dyes : 0,5%
    - HAA299
- Addition of this UV filter to Annex VI, authorization of this new filter

*Further information:* [EU – Commission Regulation \(Eu\) n°2022/2195 as regards the use of HOMOSALATE, BHT, Yellow Acid 3, HAA299 and Resorcinol in cosmetics](#)

### ▶ January 1st: Transfer of powers from ANSM to ANSES and DGCCRF

This transfer, which follows the 2023 Finance Act, entrusts :

- ANSES with vigilance over **cosmetics and tattoo products** (Article L. 1313-1 of the Public Health Code), and transfers to it the competence, currently held by ANSM, to receive **adverse reaction reports** (Articles L. 5131-5 and L. 513-10-8 of the Public Health Code) and **to give formal notice to the person responsible** to provide the necessary information in the event of serious doubt as to the safety of a substance used in the composition of a product (articles L. 5131-6 and L. 513-10-9 of the Public Health Code);
- the French competition and consumer affairs authority (DGCCRF) to **monitor and control** the French cosmetics (and tattoo) market, **declare** cosmetics manufacturing or packaging establishments and issue **GMP certificates**.

From this date onwards, establishment declarations **must be sent to the DGCCRF** via the following platform [www.demarches-simplifiees.fr](http://www.demarches-simplifiees.fr)

*Further information :* [FR - Competent authorities for control, vigilance and assessment of cosmetic products - January 2024](#)      [FR - Declaration of establishments manufacturing or packaging cosmetic products](#)

### ▶ January 1st: The obligation to display environmental qualities and characteristics (EQC) comes into force.

**Article 13-I of the AGECE Act:** Obligation to inform consumers of certain environmental qualities and characteristics, in the form of a dematerialized product sheet accessible at the time of purchase.

Already applicable to certain companies, by January 1, 2024, this will apply to companies placing at least 10,000 units/year of products on the national market AND with annual sales > €20 million; by January 2025, it will apply to companies placing at least 10,000 units/year of products on the national market AND with annual sales > €10 million.

It will also be **compulsory to provide dematerialized information** on the presence of **hazardous substances in formulas or packaging** when they are present in quantities of **more than 0.1% by mass**. This obligation concerns **SVHC substances** identified by article 59 of the REACH regulation and substances of "equivalent concern" identified by ANSES (a decree specifying these substances is currently in progress).

*Further information :* [FR - AGECE Law - Article 13 - What obligations](#)

# 2024 CALENDAR OF REGULATORY OBLIGATIONS

## ▶ January 1st: Application of the annual target of 6% of reused packaging placed on the market

This target derives from **Decree no. 2022-507 of April 8, 2022**, which aims to develop reuse in France by setting an annual proportion of reused packaging for the period 2023-2027 based on producers' annual sales. This date concerns **all producers who package products or have them packaged with a view to placing them on the market, above a threshold of 10,000 units of packaged products per year, and whose annual sales exceed 50 million euros.**

*Further information:* [FR - Reuse of packaging](#)

## ▶ January 1st: End of the period for disposing of stocks of mineral oils that do not meet the requirements of the AGEC Act

**Article 112 of Law no. 2020-105 of February 10, 2020** on the fight against waste and the circular economy introduces a ban on certain substances in mineral oils used for packaging and printing intended for the public. Packaging and printed paper manufactured or imported before January 1, 2023 benefited from a stock clearance period not exceeding 12 months from that date. As of January 1, 2024, the use of **mineral oil aromatic hydrocarbons (MOAH) containing 1 to 7 aromatic rings** and **mineral oil saturated hydrocarbons (MOSH) containing 16 to 35 carbon atoms** will be prohibited, **when their mass concentration in ink exceeds 1%.**

Mineral oils contain substances that interfere with waste recycling. Failure to comply with this ban will result in a penalty applicable to the financial contribution to be paid to the eco-organization in charge of collecting and managing packaging waste.

*Further information:* [FR - AGEC Law - Article 112: Mineral Oil](#)

## March 2024

### ▶ March 1st: Coming into force of the Descroizaille Law on the supervision of promotions

**Law no. 2023-221 of March 30, 2023**, known as the "Descroizaille" Law, limits the level of promotion for all mass-market products. In accordance with article 7 of this law, the products concerned are "mass-market products as defined in I of article L. 441-4 of the French Commercial Code". Cosmetics are therefore included in this broad definition. They may **not be subject to promotions exceeding 34% of their selling price.** The overall volume of these promotions will be **limited to 25% of the forecast sales or purchase volume** between the supplier and the distributor set by contract.

*Further information:* [FR - Law n°2023-221, known as the Descroizaille law, regulating product promotions](#)

### ▶ March 26th: « Misleading Claims » Directive to strengthen consumer protection against unfair practices and improve information comes into force

Published on March 6, 2024, the aim of this directive is **to give consumers the means to act in favor of the green transition** through better protection against unfair practices and better information. It amends **Directives 2005/29/EC on unfair commercial practices** and **2011/83/EU on consumer rights**. Member States should adopt and publish the laws, regulations and administrative provisions necessary to comply with this Directive by the entry into application date of **27 March 2026 at the latest.**

*Further information :* [EU - "Misleading claims" directive to strengthen consumer protection against unfair practices and improve information](#)

# 2024 CALENDAR OF REGULATORY OBLIGATIONS

## ▶ March 30th: Entry into force of IFRA 51 specifications and restrictions for new fragrance compositions

Published on July 10, 2023, the **51st amendment** contains 48 new standards, including 1 new ban on 3-Acetyl-2,5-dimethylfuran, based on genotoxic potential. 11 standards have been revised on the basis of new data on skin sensitization, phototoxicity and systemic toxicity. On March 30, 2024, the restrictions and/or bans on **new creations** come into force. A new creation is defined as **any fragrance composition for which the brief was issued after the cut-off date, i.e. after January 30, 2024.**

*Further information :* [INTERNATIONAL / EUROPE - IFRA : Amendments of "Code of Practice" - The IFRA standards](#)

## April 2024

### ▶ April 12th: Obligation to provide information on the presence of known, presumed or suspected endocrine disruptors

This measure stems from **article 13 of the AGECE law**. More than **120 substances** have been identified as such (none have been suspected to date) by the Anses. The aim is to provide the public electronically with information enabling them to be identified **when their concentration exceeds 0.1%**, either in the product or in its primary packaging. The information is expressed as follows: "**Contains one or more substances with known or suspected endocrine-disrupting properties**", supplemented by the **name of the substance(s)** concerned, as listed in the 3 decrees of October 12, 2023. It is planned to make this information available via the **Scan4Chem** application

*Further information:* [FR - AGECE Law - Article 13 - What obligations](#)

## July 2024

### ▶ July 30th: Entry into force of IFRA 51 ban on existing perfume compositions

On July 30, 2024, the ban on **existing creations** come into force (concerns 3-Acetyl-2,5-dimethylfuran). An existing composition is defined as **any fragrance composition already marketed in a consumer product, or which is already in the development phase/whose brief has been issued before January 30, 2024.**

*Further information:* [INT - IFRA: Amendments of "Code of Practice" – The IFRA standards](#)

### ▶ July 31th: New labelling rules apply to products containing formaldehyde-releasing preservatives

In accordance with Regulation (EU) no. 2022/1181 of July 8, 2022, amending the preamble to Annex V of Cosmetics Regulation no. 1223/2009, all products marketed from this date containing preservatives that release formaldehyde must carry the warning "Releases formaldehyde" on the label. This warning must appear whenever the total concentration of formaldehyde released exceeds 10 ppm. Manufacturers have until July 31, 2026 to sell off stocks and withdraw non-compliant products from the market.

*Further information:* [EU –Commission Regulation \(EU\) n°2022/1181 amending the existing provision for labelling cosmetic products that contain formaldehyde](#)

## December 2024

### ▶ December 30th: European regulation against imported deforestation comes into force

**Regulation (EU) no. 2023/1115 of May 31, 2023** prohibits the placing on the market, making available and exporting of basic products in question and products in question that :

- Are not "Zero deforestation" AND "Zero forest degradation".
- Have not been produced in accordance with the legislation of the country of production
- Have not been subject to a due diligence declaration.

As of this date, **raw material manufacturers** have a **due diligence obligation to collect/report/conserv**e information. For manufacturers **of finished products**, **traceability** of the raw materials used and **good production practices** must be verified. The regulation will apply **from December 30, 2024**, with a 6-month grace period for SMEs and VSEs.

*Further information:* [EU - Regulation \(EU\) 2023/1115 on fighting deforestation](#)

## Other provisions expected in 2024:

### ▶ Amendment of Annexes II, III, V and VI of the Cosmetics Regulation concerning several substances used in cosmetics, with the addition of :

- Prohibited substances (Annex II): 4-Methylbenzylidene camphor (4-MBC)
- Restricted substances (Annex III): retinol, retinyl acetate, retinyl palmitate, arbutin /  $\alpha$ -arbutin, kojic acid, genistein / daidzein.
- In authorized preservatives (appendix V): triclosan, triclocarban

### ▶ Changes to the REACH regulation which plan to limit the use of silicones :

Including **D5** (cyclopentasiloxane) and **D6** (dodecamthylcyclohexasiloxane), as well as potentially **Dimethicone**, depending on its composition (to come into force in **2026-2027**).

[More information](#)

### ▶ Revision of the European cosmetics regulation: the big project of 2024.

More information to come in the coming weeks. In the meantime, you can consult the reports of the working groups on this subject here : [Minutes WG Cosmetics 28 June 2022](#) + WORKSHOP on the targeted revision of Cosmetic Regulation

## WHAT'S NEXT ?

### ENVIRONMENTAL QUALITIES AND CHARACTERISTICS

#### ▶ **January 1st, 2025**

Compulsory electronic display of EQC for producers, importers and any other marketers who declare annual sales **in excess of 10 million euros** for the products concerned that they place on the national market, and who are responsible for placing **at least 10,000 units of these products on the national market each year.**

*Further information: [FR - AGEC Law - Article 13 - What obligations](#)*

### MINERAL OILS

#### ▶ **January 1st, 2025: Ban on the use of mineral oils:**

- For mineral oil aromatic hydrocarbons (**MOAH**), when the mass concentration in ink of these substances **exceeds 0.1%**, or when the mass concentration in ink of compounds with 3 to 7 aromatic rings **exceeds one part per million (ppm)**;
- For mineral oil saturated hydrocarbons (**MOSH**), when the mass concentration of these substances in the ink **exceeds 0.1%**.

Packaging and printed paper manufactured or imported before January 1, 2025 and complying with the provisions authorized before this date benefit from a **12-month stock clearance period**, i.e. until January 1, 2026.

*Further information : [FR - AGEC Law - Article 112: Mineral Oils](#)*

### SUBSTANCE

#### **Modification of Homosalate concentrations and authorized products**

- ▶ **January 1st, 2025** : Cosmetic products containing this substance which do not comply with these restrictions shall not be placed on the EU market.
- ▶ **July 1st, 2025** : Cosmetic products containing this substance which do not comply with these restrictions shall not be made available on the EU market.

#### **Nanomaterials: application deadlines for substances banned or restricted by Regulation (EU) no. 2024/858**

- ▶ **February 1, 2025**: Cosmetic products containing any of the banned nano substances or not complying with the restrictions will not be placed on the EU market.
- ▶ **November 1, 2025**: Cosmetic products containing one of the banned or restricted nano substances will not be made available on the EU market.

*Further information : [EU - Regulation \(EU\) no. 2024/858 "OMNIBUS NANO](#)*

## MICROPLASTICS

▶ **October 17th, 2025: Labeling obligation for polymers corresponding to criterion 5B.** This applies to both placing on the market and making available on the market.

▶ **October 17th, 2027:** Deadline for **rinsed products** containing microplastics. Ban on placing these products on the market and withdrawal of products that do not comply with these provisions.

▶ **October 17th, 2029:** Deadline for **leave-on products** containing microplastics. Ban on marketing these products and withdrawal from the market of products that do not comply with these provisions.

▶ **October 17th, 2035:** Deadline applicable to **make-up and cosmetics for lips and nails** containing microplastics. Ban on marketing these products and withdrawal from the market of products that do not comply with these provisions.

Further information: [EU - REACH Regulation on synthetic polymer microparticles](#)

## EXTENDED PRODUCER RESPONSABILITY (EPR) PACKAGING

▶ **December 31th, 2025 :** - The aim is **to reduce single-use plastic packaging by 20%**, with at least half achieved through reuse.

- Aim to reduce unnecessary **single-use plastic packaging** (non-essential function) **by 100%**.

▶ **2025 :** Aiming for 100% recycling of single-use plastic packaging: Packaging must have a recycling channel and must be able to be integrated into it without its composition interfering with the sorting or recycling stage.

Further information: [FR - AGEC Law: Article 62: EPR industries](#)

## ALLERGENS

▶ **July 31th, 2026 :** Regulation on the labeling of new allergens comes into force for the **marketing of products**

▶ **July 31th, 2028 :** Regulations on the labeling of new allergens (withdrawal of non-compliant products from the market) come into force for the **supply of products**.

Further information: [EU - Regulation \(EU\) n° 2023/1545 on the labelling of new allergens - July 2023](#)



Nano, microplastics, imported deforestation, general product safety... these are just some of the topics that will be addressed at the [COSMED regulatory conference](#)