



The following slides provide details on each point.

2025 Calendar of the main European regulatory deadlines

January

- Ban on [mineral oils](#) in packaging and printed paper 
- Mandatory display of [EQC](#) 
- Placing on the market: New requirements for: [Homosalate](#) (UV filter), [Triclocarban](#) and [Triclosan](#) (preservatives)

February

Placing on the market: New requirements to be met for: Genistein, Daidzein, [Kojic Acid](#), [Arbutine](#), [α-arbutine](#) and [Hydroxyapatite \[nano\] + 5 nano prohibited](#) by Omnibus 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Non-compliant products placed on the market before this date must be withdrawn from the market by May 1st 2026.
- Implementation of the new [CLP](#) hazard classes for substances.

July

Withdrawal from the market of products containing Homosalate non compliant to new requirements

September

Prohibition of the substances [DIMETHYLTOLYLAMINE](#) and [TRIMETHYLBENZOYL DIPHENYLPHOSPHINE OXIDE](#)

October

[Microplastics](#) labelling requirement for :
- Finished products placed on the market under criterion 5b
- Raw materials containing microplastics covered by criterion 4a (indication on the label or in the SDS)
[IFRA 51](#): Existing creations containing restricted ingredients or with specifications will have to comply with this amendment.

November

- **Withdrawal from the market of products** non compliant to new requirements :
Omnibus nano, Genistein, Daidzein, Kojic acid, Arbutin, α-arbutin, Triclocarban and Triclosan
- New maximum concentration for [Vitamin A \(Retinol and derivatives\)](#)
+ Labelling statement 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Non-compliant products placed on the market before this date must be withdrawn from the market by 01/07/2027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 AGECE 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 $> 1\text{ppm}$;
- 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 1st 2025.



Further information: [FR - AGECE Law - Article 112: Mineral oils](#)

Environmental Qualities and Characteristics (EQC)

Art. 13 AGECE Law

Compulsory electronic posting

From January 1st 2025, the dematerialised display of EQC 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

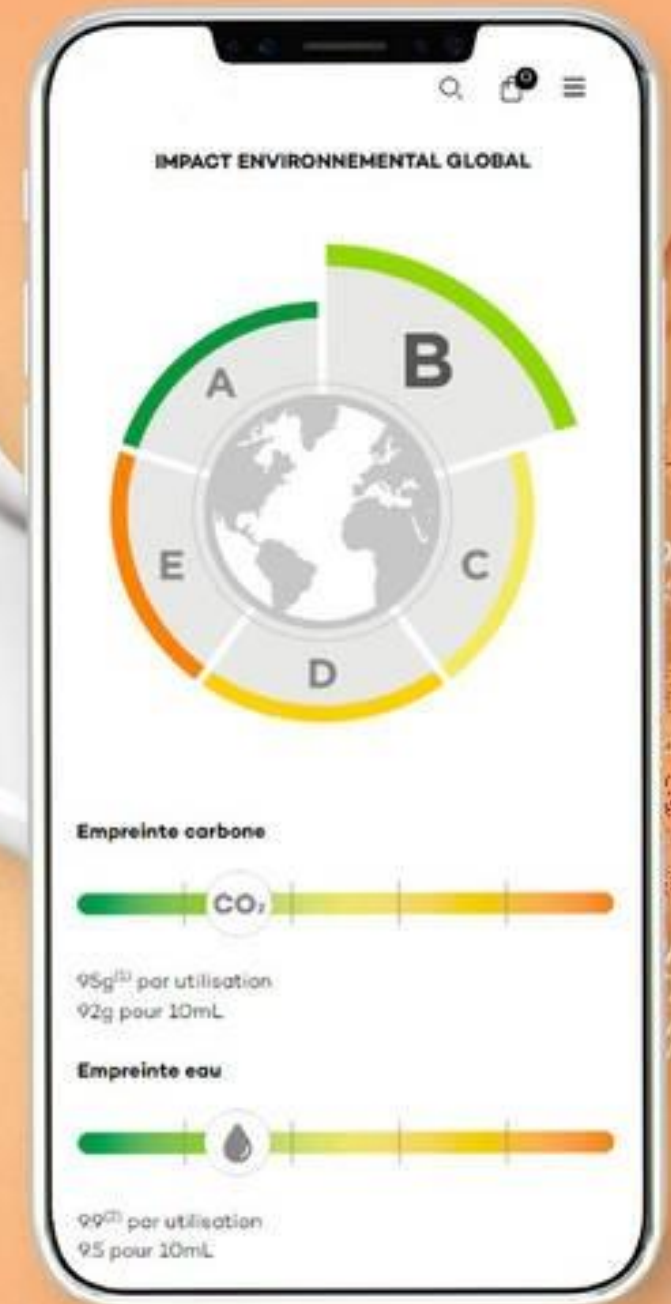
 Cumulative criteria



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



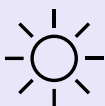
We'll be talking about this at [the COSMED regulatory congress on 26 March 2025.](#)



Substances: details of 2025 deadlines



We'll be talking about this at [the COSMED regulatory congress on 26 March 2025](#).



Homosalate (UV filter)

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

July 1st 2025: Non-compliant products withdrawn from the market
More information : [EU - Regulation \(EU\) n°2022/2195](#)



Triclocarban, Triclosan (preservatives)

January 1st 2025: New concentrations and categories to be fulfilled
-Triclocarban: C° max 0.2%, prohibited in mouthwashes and toothpaste for children under 6.

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

More details : [EU - Regulation \(EU\) n°2024/996](#)



Gensitein, Daidzein, Kojic acid, Arbutin, α-arbutin

February 1st 2025: Limited use

-Genisteine: C° max 0.007%.

-Daidzeine: C° max 0.02

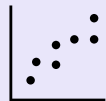
-Kojic acid: C° max 1%, authorised only in face and hand products

-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

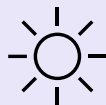
More details : [EU - Regulation \(EU\) n°2024/996](#)



Nanomaterials

February 1st 2025: End of the placing on the market of products containing nano substances that do not comply with or are banned by the Omnibus nano (9 banned substances + 1 restriction, i.e. Hydroxyapatite [nano]).

November 1st 2025: Non-compliant products withdrawn from the market
More information : [EU - Regulation \(EU\) no. 2024/858 "OMNIBUS NANO"](#)



4-MBC (UV filter)

May 1st 2025: Filter BANNED, end of placing on the market of products containing them.

May 1st 2026: Non-compliant products withdrawn from the market
More details : [EU - Regulation \(EU\) n°2024/996](#)



DIMETHYLTOLYLAMINE and TRIMETHYLBENZOYL DIPHENYLPHOSPHINE OXIDE

September 1st 2025: End of the placing on the market and making available 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 statement 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 : [EU - Regulation \(EU\) n°2024/996](#)

Annual declaration of substances in nanoparticulate form in the R-Nano register

Art. 112 AGECE 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

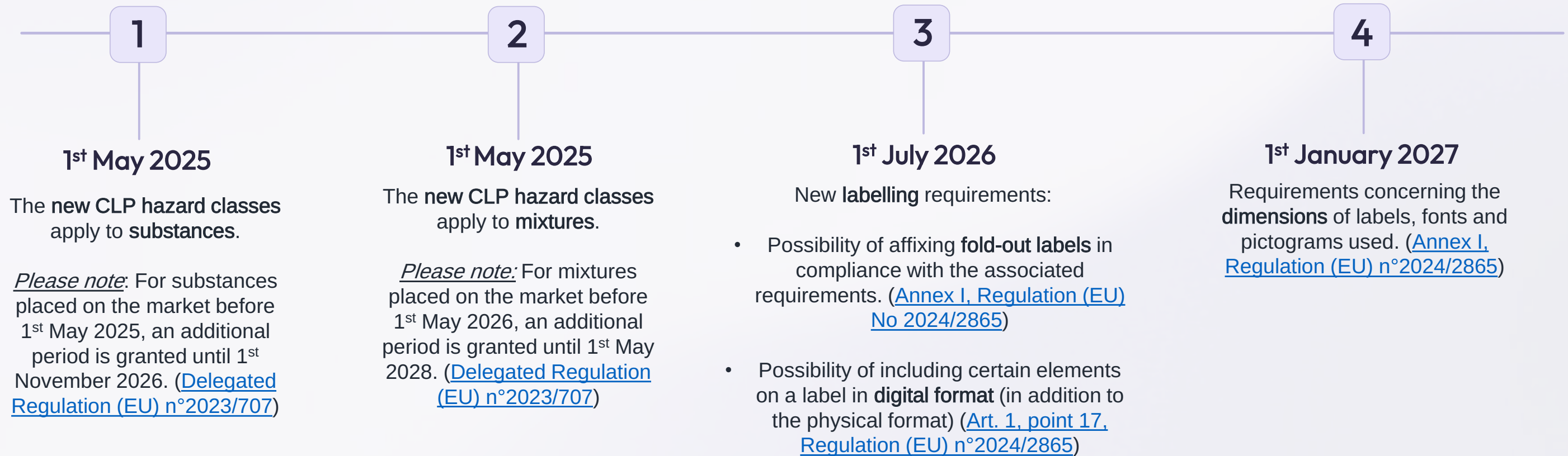


www.r-nano.fr



Further information: [FR - Annual declaration of substances in nanoparticulate form: R-Nano](#)

Classification and labelling: New deadlines for the CLP regulation



Further information: [EU – CLP Labelling mentions and danger pictograms](#)
[EU – CLP: Regulation on classification, labelling and packaging of substances and mixtures.](#)

Microplastics regulation



We'll be talking about this at [the COSMED regulatory congress on 26 March 2025](#).

1

October 17th 2025

Finished products covered by exemption 5b must be labelled "*Do not rinse before disposal*" or the picto  unless there is no risk (sealed pack)

Mandatory labelling of raw materials for industrial use (criterion 4a) with the following statement "*The synthetic polymer microparticles supplied is subject to conditions laid down by entry 78 of Annex XVII to Regulation (EC) No 1907/2006 of the European Parliament and of the Council*" + Information on the use, disposal, quantity and description of the microplastics present.

/!\ Withdrawal of non-compliant products

2

From 2027

Obligation to report by 31 May each year:
-For raw material suppliers exempted under criterion 4a
-to manufacturers/subcontractors of manufacturers (exempted under criterion 4a)
-For those placing the final product on the market, only if the microplastic is exempted under criterion 5b.

NB: Obligation from 2026 for users of microplastics in granular form (e.g. blow-moulded packaging).

3

October 17th 2027

PROHIBITION of microplastics in rinsed products (maximum content 0.01%)

4

October 17th 2029

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

5

October 17th 2031

Make-up products containing microplastics > 0.01% must be labelled "*this product contains microplastics*".

6

October 17th 2035

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



Further information: [REACH - MICROPLASTICS REGULATION](#)

IFRA 51 – Specification standards and restrictions for existing creations

The final deadline for IFRA's 51st amendment is approaching! It is scheduled for 30 October 2025.

Consequence:

- All fragrance compositions placed on the market in a consumer product, or which were in the development phase, or for which the brief was issued before 30 January 2024 and containing restricted ingredients or ingredients with specifications according to IFRA 51 must comply with this amendment by 30 October 2025.



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

EUDR regulation

Application postponed to

December 31th 2025

+ 6 additional months for Micro
and small businesses



Postponement =
additional time to gather
information

From the date of application :

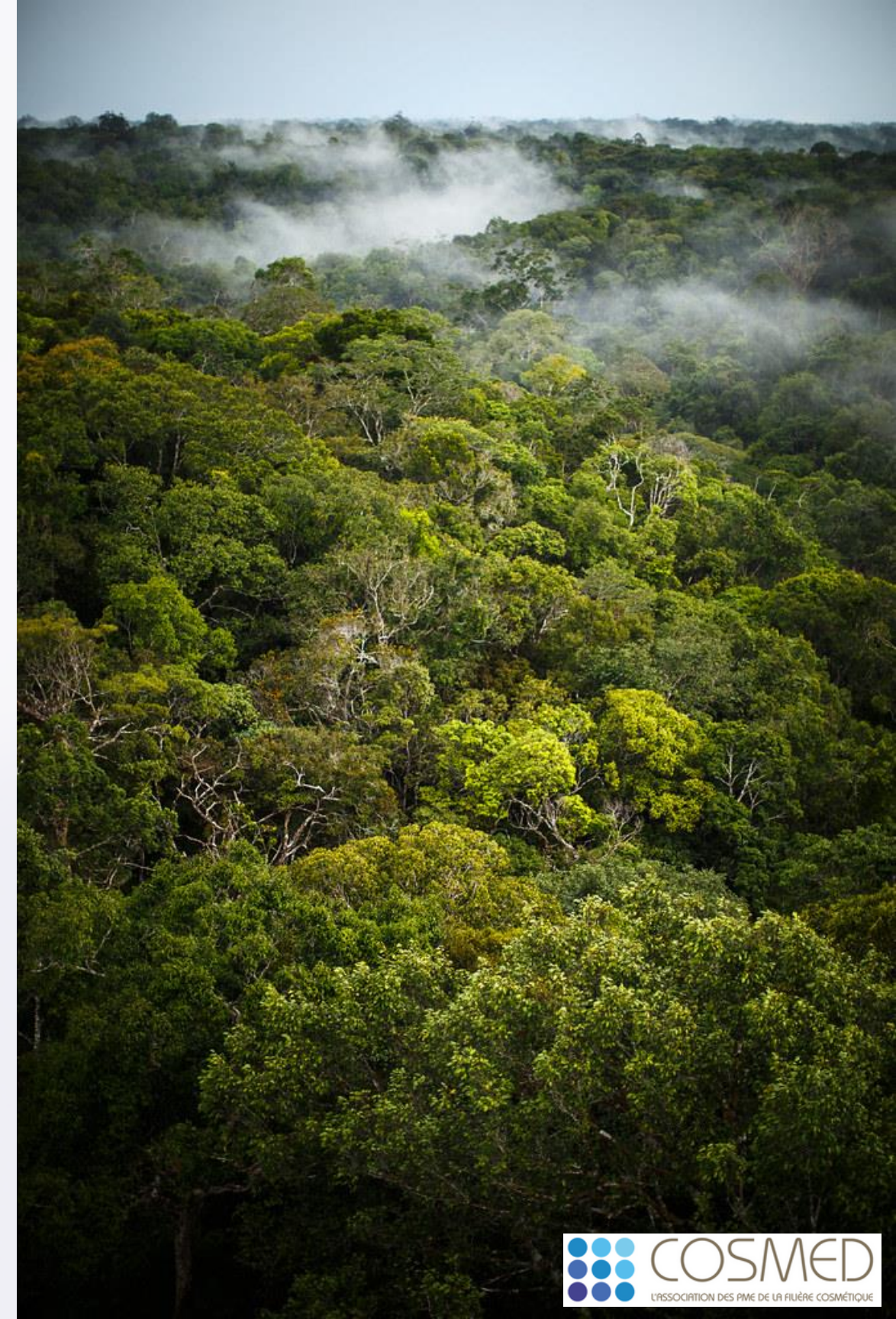
- **Manufacturers of the raw materials** in question (*in particular palm and its derivatives, cocoa, coffee and soya*) will have an obligation to exercise due diligence and to collect, report and store information.

- **Cosmetics manufacturers** must ensure that the raw materials they use do not come from lands deforested after December 31th 2020.



Further information: [EU - Regulation \(EU\) 2023/1115](#)

+ [Case studies with a checklist of obligations for each player](#)



Get ready for the deadlines on **NEW Allergens!**

1

July 31th 2026

Entry into force of the regulation on the labelling of new allergens **for the placing on the market of products**

2

July 31th 2028

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



Further information: [EU - Regulation \(EU\) No 2023/1545 on the labelling of new allergens - July 2023](#)

Other **long-term deadlines to be anticipated**

1

1st 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 (case of hexyl salicylate, o-phenylphenol and micrometric silver).



More info : [EU CLP Regulation](#)

2

July 31st 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 : [EU Regulation \(UE\) n° 2022/1181](#)

3

June 6th 2027 – Restriction 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](#)

4

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](#)

PFAS: Prepare for the impact on cosmetics!



At European level:

- **Draft regulation on universal PFAS:** The future REACH regulation is expected to restrict all substances identified as PFASs and is expected to be adopted between 2026 and 2027 at the earliest. This regulation will apply to cosmetic products and their packaging.
- Some PFAS are already subject to restrictions:
 - Regulation (EU) n°2019/1021 or POP Regulation (Persistent Organic Pollutants): Certain substances (PFOA, PFOS, PFHxS) are covered by this regulation.
 - REACH (EC) n°1907/2006: Annex XVII, entry 68 concerns PFCAs, which already include certain substances used in cosmetics.

Note: The PPWR Regulation only deals with PFAS in packaging intended for direct contact with food. (non-targeted cosmetic packaging).



At national level



- On 20 February 2025, the French National Assembly adopted a bill designed to protect the public from the risks associated with perfluoroalkylated and polyfluoroalkylated substances.
- Consequences: from **1 January 2026**, the manufacture, import, export and placing on the market, whether in return for payment or free of charge, of cosmetic products containing PFAS will be **prohibited** above the prohibition thresholds defined.



Further information : [FR – Law to protect the French population from perfluoroalkylated and polyfluoroalkylated substances](#); [REACH - Restriction Process \(Annex XVII\)](#)

COSMED is closely monitoring the development of these regulations and will keep you informed of their progress.
Don't hesitate to send us your impact studies !