



Compliance & Risks

Webinar

EU & UK Product Compliance: What's Hot in 2025 & Beyond

21 May, 2025



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Meet the Team



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Mission Statement

Ensure global companies have the tools & information to build safe, sustainable, products in a world full of change

Trusted by the World's Leading Brands

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Compliance & Risks



100K⁺
Regulations

195
Countries

10⁺
Industries

28
Languages

30
Global
Network
Partners

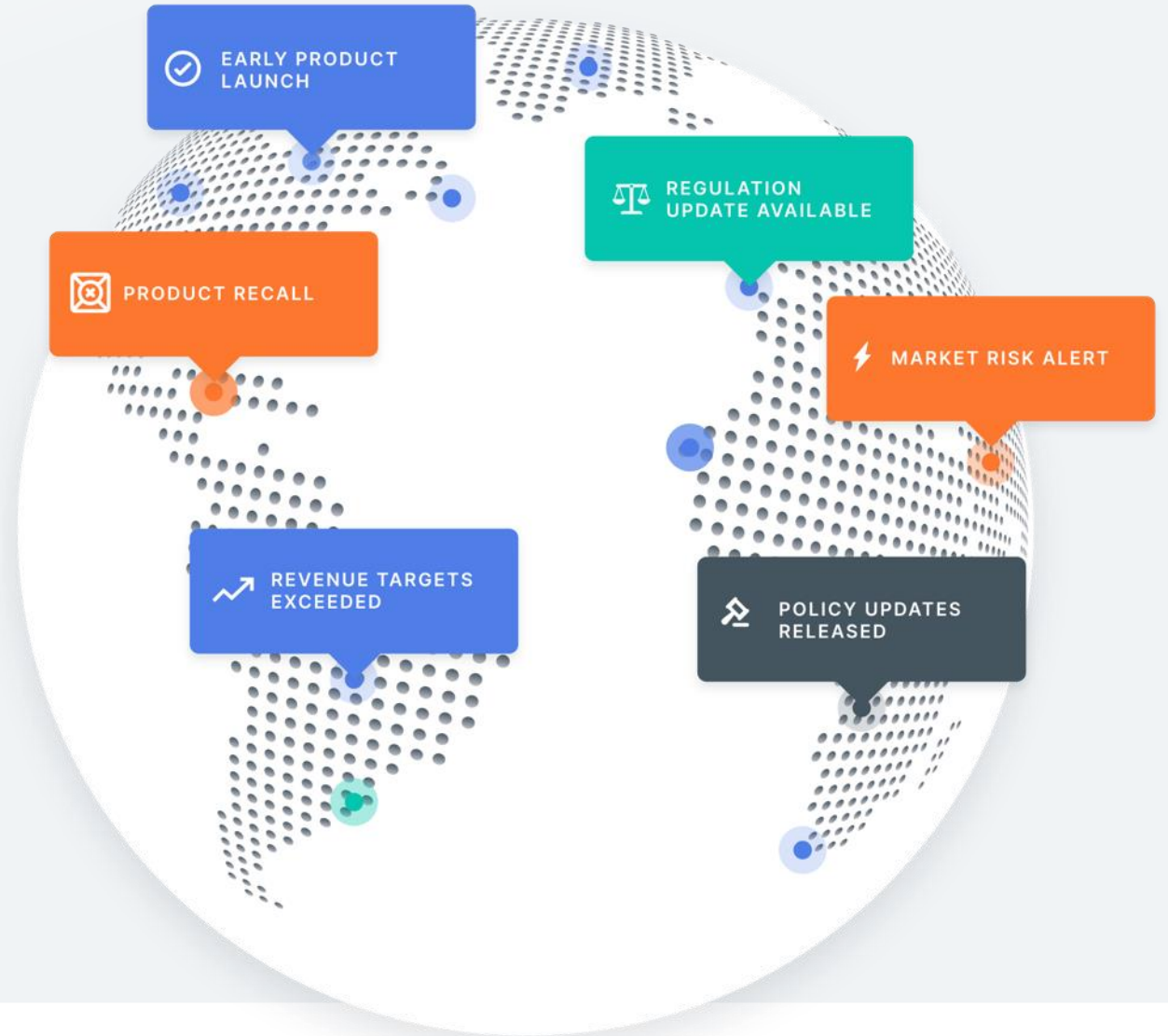
9.6k
Expert Queries
answered



WHAT WE DO

Unlocking Market Access

Keep on top of regulatory changes and their impact worldwide. Early warning alerts, impact probability, productivity workflow tools and so much more.



Agenda

- 01. Current trends in EU & UK product regulation and what's on the horizon**
- 02. Key initiatives in EU & UK product regulation**
- 03. Sustained growth in ESG regulations**





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Current Trends in EU & UK Product Regulation

What's on the horizon?



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2019-2024: Unprecedented Reform

Market Surveillance Regulation	General Product Safety Regulation	Digital Services Act	Revised Product Liability Directive	Representative Actions Directive	Revised Blue Guide
AI Act	RED Common Charger	RED Delegated Act on cyber	Cyber Resilience Act	Cybersecurity Act	NIS2 Directive
Directive empowering consumers for the green transition	Right to Repair Directive	Ecodesign for Sustainable Products Regulation	Delegated Acts under energy labelling + old ecodesign frameworks	Packaging and Packaging Waste Regulation	Batteries Regulation
Data Act	Accessibility Act	Sale of Goods Directive	Digital Content Directive	Consumer law omnibus Directive	Machinery Regulation
Revised Construction Products Regulation	REACH restrictions (e.g. PFHxA, formaldehyde etc.)	Amendments to POPs Regulation	Revised CLP Regulation	WEEE targeted amendments	Revised Waste Shipments Regulation
Critical Raw Materials Act	Revised Environmental Crime Directive	Ban on products made with forced labour	Deforestation Regulation	Corporate Sustainability Reporting Directive	Corporate Sustainability Due Diligence Directive

2025: What's in Store?

Work to implement recently passed laws (secondary legislation, guidance etc.)	Increased enforcement	E-commerce Communication (policy document)	Proposed Customs Reform Package (carried over)	Proposed AILD ?
Proposed revision of the Waste Framework Directive including producer responsibility for textiles (carried over)	Proposed Toy Safety Regulation (carried over)	Proposed Green Claims Directive (carried over)	Proposed omnibus package for sustainability reporting (CSRD, CSDDD)	Proposed omnibus package to remove certain paper requirements in product legislation
Fitness check digital area + proposed Digital Package (simplification legislation potentially cyber, DSA, AI Act)	Expansion of the Common Charger	Proposed REACH Revision	Proposed "universal" PFAS restriction under REACH	Proposed restriction on 1000+ skin sensitisers in clothing and textiles under REACH (carried over)
Continuation of other ongoing work on chemicals	Proposed revision of the Textile Labelling Regulation	First product specific Delegated Acts under ESPR (textiles and steel)	Potential horizontal Delegated Act under ESPR on repairability (incl. repair score)	Potential horizontal Delegated Act under ESPR recyclability and recycled content (EEE)
Continuation of ongoing work for certain product groups under energy labelling + previous ecodesign frameworks	Proposed Delegated Acts to expand the Right to Repair Directive	Proposed RED Delegated Act on reconfigurable radio systems (upload of software)	Proposed Digital Networks Act	Proposed Consumer Agenda 2025-2030 + Action Plan on Consumers in the Single Market (policy document)
Proposed Digital Fairness Act (consumer law)	Proposed Circular Economy Act	Potential proposal / policy arising from study on product safety and the circular economy?	Potential revision of the CPC Regulation, incl. more centralised enforcement powers for the Commission?	Potential proposal arising from study on third party litigation funding?

Drivers of Change

- International organizations and regulatory authorities
- Technological developments
- Heightened consumer awareness
- E-commerce
- Climate change



Drivers of Increased Enforcement

- Increasing number of **specialist regulators**
- Greater **institutionalised cooperation** between regulators
- Recruitment of **consumers as enforcers**
- Changing perceptions of **safety**





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Key Initiatives in EU & UK Product Regulation



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Continued Focus on Regulating New Technologies

Recent Examples Include:

Cyber Resilience Act

Aims to ensure that products placed on the EU market have fewer vulnerabilities **throughout their lifecycle**.

Enhances cybersecurity requirements and standards for products with **digital elements**.

Applies to both **hardware** and **software** products that connect to other devices or networks.

Introduces design and development obligations for **manufacturers, importers, and distributors**.

AI Act

Aims to ensure that AI is developed and deployed in an **ethical** manner.

Risk-based, with some AI systems **prohibited** and different obligations for **high-risk, limited-risk, and minimal-risk** AI systems.

Prohibited AI systems include those which **manipulate behaviour** or use certain **biometric categorisation**.

Most stringent regulatory requirements for high-risk AI systems, including including **technical documentation, cybersecurity measures, and incident reporting**.

Continued Focus on Regulating New Technologies

Reforms Targeting New Technologies Also Have Broader Impact

General Product Safety Regulation (GPSR)

Seeks to modernize product safety rules in response to **digital** and **global market changes**.

Applies to all non-food consumer products, including **connected** and **AI-enabled devices**. Commission taking position that standalone software is in scope.

New **labelling** and **website** requirements

Requires a **Responsible Person** for products sold in the EU to ensure compliance.

Introduces **accident reporting**, **new recall obligations**, and **stricter market surveillance**.

Product Liability Directive (PLD)

Expanded scope – not just hardware, but also software, AI systems and related services.

More damages – including data loss/corruption and medically-recognised harm to psychological health

Expands liability to **online marketplaces**, **fulfilment service providers**, and those **modifying** products.

Makes it **easier for consumers to claim compensation** by introducing presumption of defect in some circumstances – including where relevant regulatory non-compliance

Introduces new disclosure/discovery obligations into EU, which are new in many member states.

Sustainability and the Right to Repair

From Design, to Point of Sale, and Beyond

Ecodesign for Sustainable Products Regulation (ESPR)

Requirements to design for **repairability** and for **spare parts**.

Requires information on **how to repair** & **Digital Product Passports (DPPs)**.

Batteries Regulation

Requirements for appliances to be designed for batteries to be readily **removable** and **replaceable** by end-users.

New supply chain, due diligence and reporting requirements

ECGT & Green Claims Directive

Consumer information requirements related to **repairability**, **spare parts** and **software updates**.

Energy labelling requirements

Product-specific (e.g., mobile phones, tablets).

Includes a **repairability score** on the label, and requirements to include **information on repairability** in Product Information Sheet.

Right to Repair Directive

Amends statutory warranty under the Sale of Goods Directive to **encourage repair**.

Establishes new obligation on **manufacturers to repair** (outside of statutory warranty) certain goods

Includes new mechanisms to **facilitate repairs**.

Digitalization of Compliance Enforcement

- **Digital Product Passports (DPPs)**

Digital records of the physical product's lifecycle, including manufacturing details, materials, and environmental impact.

- **Customs reform**

Overhaul of customs procedures the introduction of a "Trust and Check" trader status, data hubs for e-commerce and other businesses, and a new focus on compliance with EU product standards.



UK Divergence

New Laws Providing for Flexibility and Adaptation to the UK Market and Regulatory Environment

- **Product Regulation and Metrology Bill**
Update to UK's post-Brexit product safety and regulation framework. An enabling act with broad powers for the UK to align with / diverge from the EU.
- **Digital Markets, Competition and Consumers Act 2024**
Introduces a new regulatory regime for **large digital market platforms**. Significantly **widens enforcement remit of CMA** in consumer protection, particularly in relation to online activities.





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Sustained Growth in ESG Regulations



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EUDR

and Recent Guidance

- From **December 31, 2025** the EUDR prohibits the import, export or the making available on the EU market certain commodities and derived products linked to deforestation
- Goods must be:
 - Deforestation-free
 - Legally produced
 - Accompanied by a *due diligence statement (DDS)*
- **DDS** must be filed **before** the product can be made available on the EU market, imported or exported and must contain, e.g., geolocation coordinates of production site
- Recent Commission guidance has aimed to clarify and simplify obligations, particularly for downstream traders



ESPR

Repeals and Replaces the Ecodesign Directive 2009/125/EC

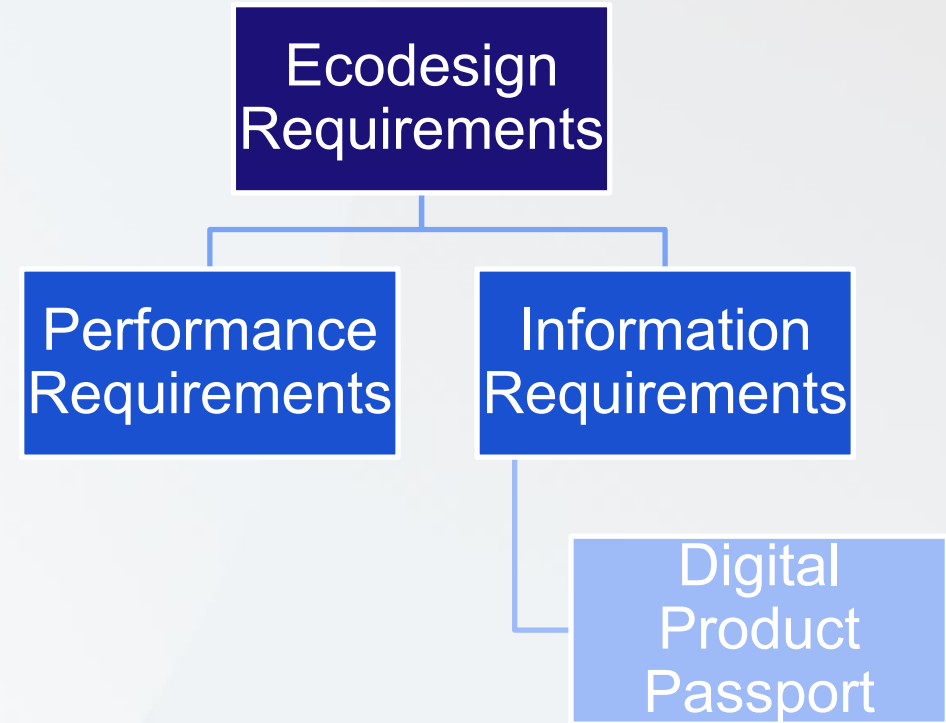
- **Expands scope of ecodesign requirements** beyond energy-related products to all physical products (**including components and intermediate products such as steel and aluminium**) placed on the EU market with few exceptions, e.g. vehicles, food, medicinal products
- **Delegated legislation** will set out mandatory ecodesign requirements for specific product categories. **High priority product groups** set out in first working plan included **energy-related products** and new product groups:
 - **2026:** Iron & Steel
 - **2027:** Textiles/Apparel, Tyres, Aluminium
 - **2028:** Furniture
 - **2029:** Mattresses



ESPR

Delegated acts for each product group will set out **design and performance requirements** and **information requirements** including details on what to include in the Digital Product Passport

- **Performance requirements** may relate to, e.g.:
 - Durability, reparability
 - Presence of "substances of concern"
 - Energy use and efficiency
 - Water use and efficiency
 - Recycled content
 - Recyclability
 - Product carbon footprint
- **Information requirements** may relate to, e.g.:
 - Information on performance of the product, e.g., a reparability score, a durability score, an environmental footprint score
 - Information on how to install, use, maintain and repair the product
 - Information on disposal



ESPR



New annual disclosure obligation on number and weight of **unsold consumer products** discarded per year



First filing in 2026
on FY2025 data



Ban on destruction of unsold consumer products (currently limited to footwear, apparel and clothing)



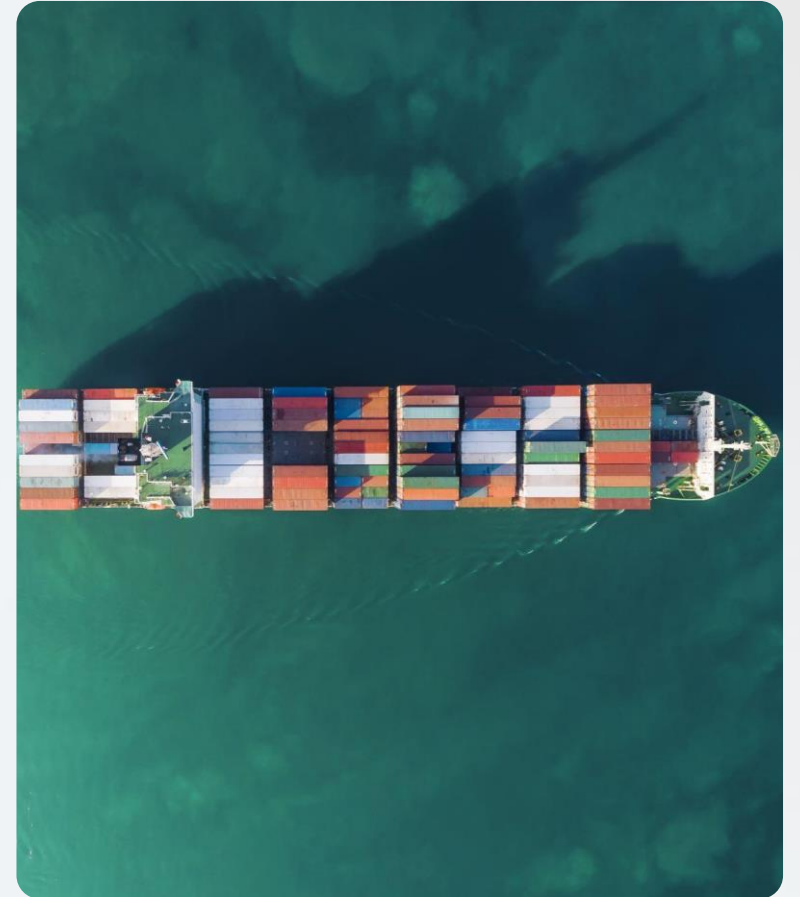
From July 19, 2026



Ecodesign obligations + Digital Product Passports to be set in **delegated legislation** for specific product groups



Applies once delegated legislation adopted
(expected 2026 onwards)





PPWR

Repeals and replaces the Packaging and Packaging Waste Directive (94/62/EC)

- As a “Regulation” this law will apply directly in each EU Member State providing for greater harmonisation
- The PPWR will introduce:
 - New sustainability requirements
 - New compliance and producer responsibility requirements
 - New labelling requirements
 - New requirements for green claims

August 12, 2026

August 12, 2028

January 1, 2030

Requirements on:

- “Substances of concern”
- Traceability labelling

Requirements on:

- Pictograms requirements
- Harmonised labelling

Requirements on:

- Recycled content
- Recyclability
- Packaging minimisation, etc.

Supply Chain Transparency & Responsibility

Several recent EU laws focus on supply chain transparency and due diligence, promoting sustainability, responsible business practices.



Batteries Regulation

Supply chain diligence and producer responsibility obligations apply from **August 18, 2025**



Deforestation Regulation

Supply chain diligence obligations for listed products and commodities apply from **December 30, 2025**



Packaging and Packaging Waste Regulation

Sustainability requirements and EPR obligations apply from **August 12, 2026**

(UK EPR equivalent already applies (as of January 1, 2025))



Forced Labour Regulation

Prohibition applies from **December 14, 2027** with risk of investigation and enforcement creating pressure to conduct upstream due diligence

EU Omnibus Legislation

Initiated Under New Commission to Reduce the Regulatory Burden

Key texts covered by the Omnibus:

- **CSRD:** Corporate Sustainability Reporting Directive
- **EU Taxonomy Regulation**
- **CSDDD:** Corporate Sustainability Due Diligence Directive

Content of the future Omnibuses

- Introduction of a **“small mid-cap”** category of companies
- **Digitisation** to remove inefficient paper formats in product legislation



STOP THE CLOCK – IN FORCE AS OF APRIL 17, 2025



SUBSTANTIVE CHANGE TO BE NEGOTIATED

Level 1 and Level 2 reopening of the legislation

Questions?



Lets Talk



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