

**CHSA**

Cleaning and Hygiene  
Suppliers Association



# Sustainability Regulation Outlook

## What's Coming in Environmental Legislation for UK Cleaning & Hygiene Manufacturers (2026–2028)

Environmental regulation affecting the cleaning and hygiene sector is entering a more complex and commercially significant phase. For UK manufacturers and distributors operating domestically and into EU markets, the next three years will bring tighter chemical controls, more demanding packaging rules, and increased data and reporting obligations.

Whilst sustainability has been a commercial advantage for some time, regulations and compliance is fast becoming a baseline requirement for market access.

## Regulatory Pressure: UK and EU Division

Since Brexit, regulatory alignment between the UK and EU can no longer be assumed. Businesses supplying both markets must increasingly manage parallel compliance regimes, particularly in chemicals and product authorisations.

The policy direction set by the European Commission under the European Green Deal continues to drive expansive environmental reform across chemicals, packaging, carbon reporting and waste. These reforms are potentially going to impact the chemicals and plastics industries hardest, but only where the business is trading in the EU.

Meanwhile, the UK Government is pursuing its own environmental framework, with distinct timelines and administrative systems. Most of these have not yet been seen but it would not be surprising if they didn't eventually look a lot like the EU regulations.

For manufacturers, this means duplication risk, increased registration costs, and growing administrative burden.

## Chemicals: REACH, PFAS and Microplastics

Chemical regulation remains the area of greatest potential disruption. Under EU REACH, administered by the European Chemicals Agency, a wide-ranging proposal to restrict PFAS (per- and polyfluoroalkyl substances) could affect numerous applications, including certain surfactants and performance additives used in specialist cleaning formulations. The direction of travel is clear: substances with environmental persistence or bioaccumulation concerns face escalating scrutiny and additional restrictions. In some cases where there are other products that could be used the substance could most likely be banned.

At the same time, microplastics restrictions are progressing, potentially affecting encapsulated fragrances, polymer-based ingredients and certain speciality additives.

In the UK, UK REACH is overseen by the Health and Safety Executive. Although broadly similar in structure to EU REACH, divergence in data requirements, transitional arrangements and evaluation timelines presents ongoing uncertainty. In most cases the UK does seem to be significantly behind the EU deadlines. Manufacturers exporting into both markets may face duplicate data submissions and rising compliance costs.

For the cleaning and hygiene sector, implications include:

- Reformulation programmes.
- Increased raw material due diligence.
- Greater technical documentation requirements.
- Rationalisation of low-volume SKUs where compliance costs outweigh returns.

## Biocidal Products: Post-Pandemic Scrutiny Returns

During the pandemic, disinfectant approvals were accelerated to meet urgent demand and some derogations were put in place. That flexibility is receding.

Under the EU Biocidal Products Regulation (BPR), again administered by the European Chemicals Agency, active substances continue to undergo rigorous review, with environmental fate and ecotoxicity assessments under heightened focus. In Great Britain, the equivalent regime is managed by the Health and Safety Executive under GB BPR.

Manufacturers of disinfectants and antimicrobial products should expect:

- Ongoing active substance re-evaluations
- Tightened environmental risk assessments
- Longer authorisation lead times
- Increased dossier costs
- Withdrawal of support for the market

For distributors, ensuring that supplied products remain authorised in both GB and EU markets will require close supplier engagement and forward planning.

# Packaging Reform: EPR and Recycled Content

Packaging is moving rapidly from recyclability aspirations to financial accountability.

In the UK, Extended Producer Responsibility (EPR) reforms are being implemented under the oversight of the Department for Environment, Food & Rural Affairs. The scheme introduces modulated fees based on recyclability and requires significantly more granular data reporting. In parallel, the UK Plastic Packaging Tax continues to apply to plastic packaging containing less than 30% recycled content.

At EU level, the Packaging and Packaging Waste Regulation (PPWR), led by the European Commission, will introduce mandatory recycled content targets for plastic parts of packaging, reuse requirements for transport packaging, and stricter design-for-recycling standards. The requirements of the new regulation will not all be mandatory at once, instead they are introduced stepwise. Some details of the legislation will be specified via secondary legislation which is under development.

For cleaning product manufacturers and distributors, this is likely to accelerate:

- Adoption of mono-material packaging. Typically, recyclability criteria favour mono-material solutions which means packaging made of a single material, or where any additional material is insignificant and does not exceed 5% of the total mass of the packaging.
- Increased use of post-consumer recycled (PCR) content in plastic packaging.
- Growth in concentrates and refill formats.
- Higher packaging data and reporting obligations.
- Margin pressure as compliance costs are absorbed or passed on.
- Shift to reusable transport packaging: as of 2030 at least 40% of transport packaging in total has to be recyclable, and for B2B and intra-business transport packaging the reuse target is 100%. Cardboard and large equipment and custom-made transport packaging are excluded.

Distributors placing own-brand products on the market will be particularly exposed to EPR liabilities. The producer pays principle (PPP) is in effect here. The brand owner is responsible for the majority of costs.

## Carbon Reporting and Supply Chain Transparency

Although many small and mid-sized cleaning manufacturers are not directly in scope of EU corporate reporting rules, indirect exposure is growing.

The Corporate Sustainability Reporting Directive (CSRD), introduced by the European Commission, requires large EU companies to disclose detailed environmental data, including Scope 3 emissions. As a result, suppliers into EU markets are increasingly being asked to provide product carbon footprint information, emissions data and sustainability metrics.

UK distributors supplying into multinational FM, healthcare or retail clients may face similar data requests through procurement processes.

Over the next three years, environmental data provision is likely to shift from voluntary marketing material to structured, auditable datasets.

## Wastewater and Environmental Discharge

Beyond product composition and packaging, wastewater and discharge standards are tightening across Europe. Surfactant biodegradability, aquatic toxicity and industrial effluent quality are under increasing scrutiny.

Manufacturers operating blending facilities or supplying industrial and institutional (I&I) markets should anticipate greater regulatory oversight of environmental impact upon the facilities with reductions in discharge limits and heightened regulatory scrutiny.

## Strategic Implications for the Sector

The cumulative effect of these regulatory shifts is structural rather than incremental.

- Compliance costs are rising – particularly for dual UK/EU operators.
- Regulatory capability is becoming strategic – not merely administrative.
- SMEs may face disproportionate impact – potentially driving consolidation.
- Reformulation and packaging redesign cycles are accelerating.
- Access to EU markets may increasingly depend on proactive alignment with EU standards – even where UK requirements differ.

Environmental legislation is no longer confined to technical departments; it has direct implications for product development, procurement, pricing strategy and market positioning.

# Greenwashing

Greenwashing means the deceptive practice of a company or organization portraying its products, services, or operations as more environmentally friendly than they actually are, through misleading marketing or false claims. In the UK the Green Claims Code was introduced by Competition and Markets Authority in 2021. As of April 2025, strengthened consumer protection regimes are in place and companies can face fines for greenwashing that can be up to 10% of their global turnover. The EU Directive on Empowering consumers for the green transition entered into force in March 2024. Member states had to implement the directive by March 2026 after which companies have to comply within six months. The directive broadens existing consumer protection rules to ban misleading practices concerning both environmental and social claims. For example, it bans:

- Generic environmental claims, such as “environmentally friendly” and “natural”.
- Claims based on emissions offsetting schemes that a product has neutral, reduced or positive impact on the environment.
- Sustainability labels not based on approved certification schemes or established by public authorities.

A key principle in both the UK and EU regulation is that environmental claims should be specific and accurate and substantiated by data. For example, a product cannot be claimed to be biodegradable without proof of recognised excellent environmental performance relevant to the claim.

# EUDR

The EU regulation on deforestation-free products (EUDR) entered into force in June 2023. Its main provisions were initially due to apply from 30 December 2024, but the timetable has been postponed and changes in content have been introduced. The Commission has to carry out a review of the legislation, possibly with a new legislative proposal, by 30 April 2026. Legislative uncertainty thus continues.

The aim of EUDR is to minimise the risk that products from supply chains associated with deforestation or forest degradation are placed on the EU market or exported from the EU market. The leading principle of EUDR is to increase transparency of value chains via due diligence obligations.

## What Should Businesses Be Doing Now?

For manufacturers and distributors seeking to stay ahead of the curve:

- Conduct a dual EU/UK regulatory gap analysis.
- Audit product portfolios for PFAS and other high-risk substances.
- Model exposure to EPR fees and packaging tax liabilities.
- Engage suppliers early on raw material transparency and continuity.
- Begin structured collection of product-level carbon and sustainability data.
- Integrate regulatory horizon scanning into strategic planning.

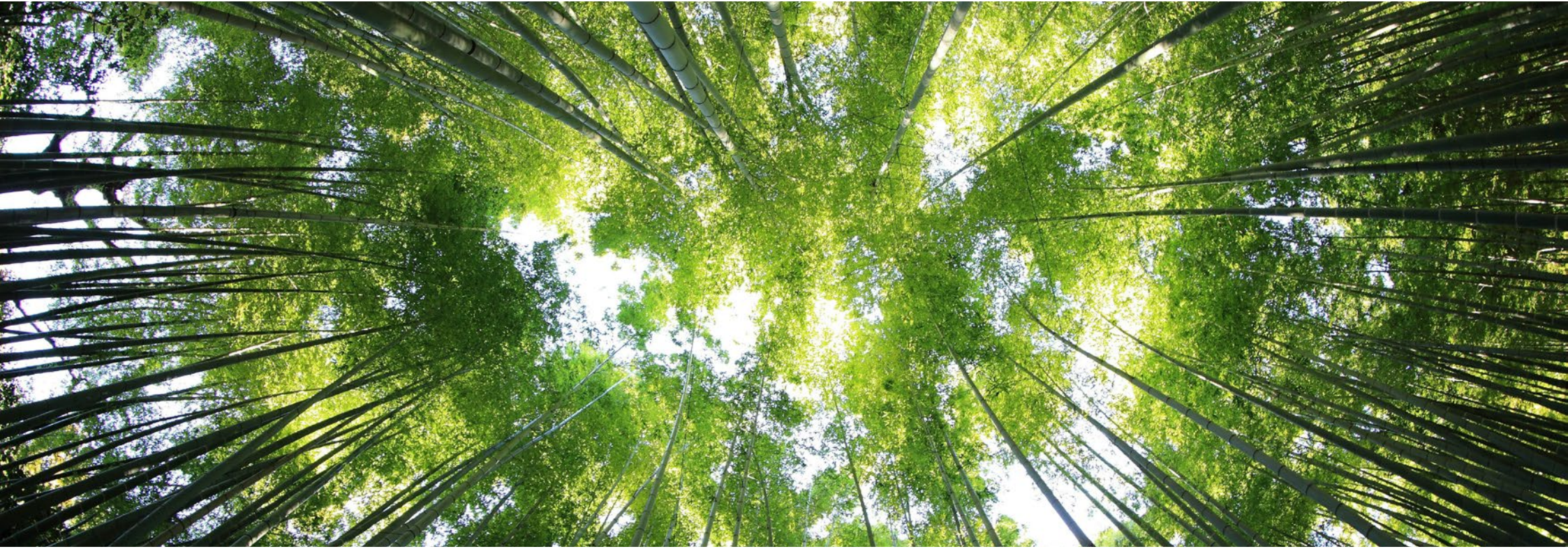
The regulatory environment for cleaning and hygiene products is tightening, but it is also clarifying expectations. Businesses that treat compliance as a forward-looking investment rather than a reactive cost will be better positioned to maintain market access, protect margins and build resilience across UK and EU markets.



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