

An update from Europe

LHCA 7th Annual Meeting

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Agenda

01



The pulse of Brussels

- Geopolitics & simplification
- Livestock strategy
- Leather traceability (EN 18199)

02



Implementing EU policies for export

- Packaging Regulation (PPWR)
- Empowering Consumers Directive
- Environmental Footprint

03



What to look for: upcoming EU legislation

- EUDR review 2030
- Skin sensitisers & bisphenols
- Universal PFAS ban

01

The Pulse of Brussels

The EU: a bigger union, but a fragile union



Geopolitics & simplification at the EU's core

Annual speech by the EU Commission President to EU citizens

HIGHLIGHTS – GEOPOLITICS AT THE CORE



Canada

Set to become the first supporting member of the EU, although it is unclear what this will actually mean.



Large but fragile union

The EU is conscious of its influence, but also of the external influences threatening its unity.



Second China shock

Rebalancing trade with deeds instead of words.



Double generational threat

Climate change remains at the top of the agenda, but AI risks have become extremely relevant.



No gold-plating

EU countries are asked to stop being more ambitious than the EU when transposing EU law.



Simplification is crucial...

...but Green Deal files are still in the implementation stage.

New narrative for livestock and by-products

Strategies are non-legally binding communications that set the course for what comes next.

THE NEW NARRATIVE

Livestock is no longer a problem to be regulated away.

It is a tool to:



Strengthen rural areas



Protect the Eastern front with Russia



Ensure protein security

New provisions introduced in the strategies



Biogenic carbon

Openness to considering biogenic carbon in livestock's environmental footprint



Value of by-products

Recognition of the value of by-products in livestock systems, with a focus on wool valorisation



Small mobile slaughterhouses

Investment in small mobile slaughterhouses to improve animal health

Off the EUDR, but traceability still matters

The EN 18199 standard for minimum leather traceability

Structured in 3 levels

1 Minimum requirements

2 ~~EUDR requirements~~

TO BE REMOVED

3 Voluntary requirements



Minimum requirements

- Based on recording types of data commonly available in business transactions
- Based on site names



Voluntary requirements

Reports and certificates to back sustainability claims



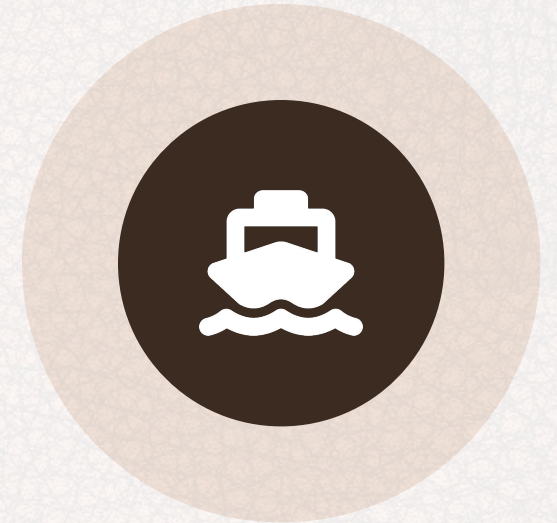
Objective: simplify

Make this the minimum standard for all leather traceability requirements, and favour interoperability.

02

Implementing EU policies

For export



Packaging Regulation (PPWR) compliance

Documentation



Disclaimer: the policy started applying before it could be applied in practice; some key secondary legislation is expected in 2027.

EU authorities are only issuing alerts: no bans, fines or blocks in 2026 or early 2027.

Each shipment of a packaged product to the EU will need to be accompanied by:



A Declaration of Conformity
showing compliance with the PPWR

2026: lead, cadmium, mercury, Cr(VI) < 100 mg/kg



Technical documentation
proving conformity

But many more requirements will be phased in gradually, including:

2027

- Some EU countries may request a QR code proving that EPR responsibilities are fulfilled

2028

- Packaging designed for material recycling
- Label with information on material composition

2030

- Recycled and recyclable content
- Volume-to-weight ratio standards

Packaging Regulation (PPWR) compliance

EPR registers

Furthermore, if exporters sell to consumers, they will need to:

- 1 Register in the Extended Producer Responsibility (EPR) register of each EU country they export to
- 2 Pay the registration fee (depends on the EU country)
- 3 Appoint a “responsible person” in each EU country
- 4 Fill in a yearly report (per EU country) by 1 June, including quantities by weight of packaging, based on the categories set in the law

***Selling to an end user** means selling to a user who receives the product and does not put it back on the market in the same form in which it was supplied.*



In B2B transactions

These duties sit with the EU operator. **But this is a contentious point – worth checking with your clients.**

End 2027

EU countries are expected to have their EPR registers ready



Stay tuned: simplification of the EPR registers is currently being debated

- Postponement of EPR requirements for SMEs, or an exemption
- Threshold-based compliance, set on volume

Empowering Consumers Directive (EmpCo)

Forbids the use of specific B2C claims without clear, objective, publicly available, verifiable and non-misleading information.

Claims will need to:



Not be misleading regarding the product's main characteristics (8 entries) and circularity aspects (16 entries)



Use only sustainability labels backed by a certification scheme recognised by a third-party certification entity



Be backed by demonstrated excellent environmental performance, if generic



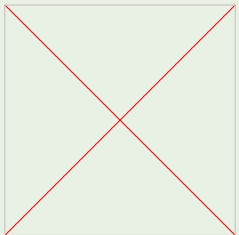
Not refer to CO₂ neutrality if based on offsetting GHG emissions



Not be based on requirements set by law that apply to all products within a category



Not to be confused with the Green Claims Directive, whose approval is currently stalled.



Valid for explicit, but also implicit claims!

Example: the green leaf

Environmental Footprint methodology



The EU Commission lost the contracts for the datasets supporting the latest EF dataset (3.1) and the one currently being developed (4.0).

CURRENT BLACK HOLE UNTIL

2028

In the meantime



Guidance on how to use EF 3.1



Civil society asked for datasets (leather included)



Tender for a textiles dataset (likely including leather)



Possible inclusion of biogenic carbon accounting in EF

03

What to look for

Upcoming EU legislation



EUDR 2030 – What's next?

14 September
2026

Leather was officially excluded from
the EUDR

**Still, this does not mean that,
according to the EU, leather does not
fuel deforestation.**

*The decision was based entirely on
practical supply chain considerations
regarding the livestock and leather goods
industries.*

The regulation will be reviewed in 2030 through a report,
accompanied by either:



Full legislative proposal

2 years

to approve, with the Commission,
Council and Parliament



Secondary legislation

2–4 months

to approve – Commission only, with
Council/Parliament limited to scrutiny

OR

In the meantime, many more things can happen...



Elections in EU countries and for the European Parliament → a new
EU Commission



Will the EUDR still be there?

Skin sensitisers



Timeline: end of 2026 – beginning of 2027



The final proposal at technical level has been stalled for the past 4 years



Left-wing MEPs have asked for it to be taken up again

As of now, it would set:

EXTRACTABLE COBALT IN LEATHER

15 mg/kg

Proposed limit

CHROMIUM VI

1 mg/kg

Down from the current 3 mg/kg REACH limit for leather in contact with skin

Bisphenols restriction



Timeline: beginning of 2027



2023

German proposal – taken down

WITHDRAWN



NEW PROPOSAL

27 March 2027

New proposal to be published



It remains to be seen what it will include, **but it is set to restrict bisphenols considerably for the leather industry.**

Universal PFAS ban



Timeline: end of 2027 – beginning of 2028 (TBC, very political)

As of now, it includes:

STEP 1 · SCREENING TEST

< 50 mg/kg

Total fluorine



STEP 2 · THEN

< 25 mg/kg

per targeted PFAS

< 250 mg/kg

for the sum of all PFAS



Problem: false positives for leather

due to high levels of non-PFAS fluorine (inorganic fluorine)

Thank you



For any questions, please reach out to
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Interested in joining COTANCE? Write to
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