

HSE chemicals legislative reform proposals

18 August 2025

Legislation and
Governance Unit

We welcome the opportunity to provide feedback on HSE's proposals for legislative reform for classification, labelling and packaging (CLP) regulations, biocidal product regulations (BPR) and prior informed consent regulations.

Green Alliance is an independent think tank and charity focused on ambitious leadership for the environment. The legislation and governance unit undertakes analysis of legislative and regulatory changes relevant to the environment and provides detailed advice to parliamentarians, officials and the environment sector.

We are concerned about the potential impact of these proposals on protections that safeguard the environment and human health, regulatory certainty and on the government's environmental principles and goals.

We urge HSE and ministers to pause the proposed reforms and rethink their approach.

Our concerns

- **Impact on regulatory certainty** – the government has recognised the importance of a stable, predictable and consistent regulatory regime, to foster the certainty essential for investment, business, regulators and consumers.¹ The proposal to tie CLP and BPR to regulation in multiple, unspecified foreign jurisdictions with different standards and systems to the UK would be the antithesis of the stability the government has said it wants to see, due to the unknown and potentially highly variable regulatory outcomes.
- **Wide discretion without detailed safeguards** – the proposals would equip HSE with extremely broad discretionary powers but do not provide any clarity on what, if any, legislative guardrails would be attached to the exercise of these powers. There is a general statement on pages 5 and 32 of the consultation document that HSE's policy aim is to reduce burdens on business while not reducing standards of health or environmental protection. If the proposals proceed, further detail must be provided in legislation on what that means in practice.

- **Lack of reference to environmental principles and goals** – we were surprised that the consultation makes no reference to the environmental principles listed in section 17(5) of the Environment Act 2021. It is also not clear how the proposals would contribute to the aim of the government’s statutory Environmental Improvement Plan to reduce the level of harmful chemicals entering the environment.
- **Impact on alignment with EU policy** – deriving GB regulatory decisions from multiple jurisdictions will widen divergence from the EU and impact the UK internal market. This could impair the pro-alignment approach being pursued by the UK government and the devolved administrations in other policy areas.
- **Lack of evidence on cost savings** – the costs of assessing the suitability of multiple foreign jurisdictions, understanding data requirements, and putting in place bespoke monitoring regimes and dispute resolution systems are likely to be substantial. It is concerning that detailed costings of basing GB decisions on those of unspecified countries with different systems or standards have not been provided.

Conclusion

Without further evidence and safeguards, there is a significant risk that the proposals would lead to a regression in existing levels of protection for human health and the environment in the UK. This would put people and the environment at risk and harm the UK’s international reputation of upholding high chemicals standards.

The proposals are premature and unjustified and should be rethought.

An alternative approach

We understand HSE’s desire to relieve pressure on its limited capacity and tackle the review and approval backlog. We are not convinced that the proposals are specific or detailed enough to offer a practicable solution to these issues while still affording important safeguards for the environment and human health and protecting the integrity of the UK internal market.

We believe that HSE’s aim could instead be achieved by harmonising GB chemical regulations with EU decisions. This would provide the efficiencies sought, deliver regulatory certainty for businesses and others and safeguard the UK internal market, without putting important protections at risk.

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¹ HM Treasury, 31 March 2025, [New approach to ensure regulators and regulation support growth](#)