



## **TPO Ban – Compliance Checklist for Manufacturers, Importers and Distributors**

- Conduct a full formula audit to identify products containing TPO.
- Confirm TPO-free photoinitiators with raw material suppliers.
- Begin reformulation and validate curing performance.
- Perform stability, microbiological and packaging compatibility tests.
- Update PIF, CPSR, SDS and technical specifications.
- Revise labelling and INCI declarations.
- Submit updated notifications via EU CPNP and UK SCPN.
- Inform distributors and B2B partners.
- Prepare a formal withdrawal plan for TPO-containing stock.
- Set internal EU sell-through deadline (31 August 2025).
- Plan a dual compliance strategy for EU (2025) and UK (2026).
- Ensure full batch traceability across transitions.