

Hotel Amenity Compliance

What to audit, document, and change before August 2026. Current as of June 2026 — covers Balearic Law 8/2019, Regulation (EU) 2025/40 (PPWR), and CPNP under (EC) No 1223/2009.

RESPONSIBLE PARTY:

SUPPLIERHOTEL / PROPERTY

01 SUPPLIER AUDIT

SUPPLIER

Ask these questions now

☐ CPNP notification number confirmed for each product as supplied — not the base formulation

Custom-branded variants require their own separate CPNP registration

☐ Responsible Person (RP) designation confirmed in writing per product

If your hotel name is on the bottle, verify you are not holding RP liability

☐ Cosmetic Product Safety Report (CPSR) available for each product

☐ Product Information File (PIF) on file with the Responsible Person

☐ ISO 11930 preservative efficacy challenge test result on file

☐ Stability study (minimum 12-week accelerated) documented per formulation

☐ Fragrance allergen compliance confirmed per Regulation (EU) 2023/1545 — 82 substances from 1 August 2026 (expanded from 26); supplier declares mandatory labelling thresholds met (leave-on >0.0001%, rinse-off >0.001%)

AUG 2026

If your amenities contain fragrance, this is a required supplier audit item from August 2026. Ask your supplier for an allergen screen against all 82 substances

02 FORMAT COMPLIANCE

HOTEL / PROPERTY

Balearic Law 8/2019 — already in force

☐ No single-use plastic miniatures in any guest bathroom

IN FORCE NOW

Law 8/2019 applies to all accommodation in Mallorca, Ibiza, Menorca, Formentera — no phase-in period

☐ Replacement format confirmed: dispensing system, certified compostable, or permanent vessel

☐ Compostable alternatives carry EN 13432 certification — “biodegradable” alone is not sufficient

☐ Dispensing vessels have tamper-evident closures

☐ Housekeeping refill protocol documented and communicated to staff

03 PACKAGING — PPWR

SUPPLIERHOTEL / PROPERTY

Regulation (EU) 2025/40 · August 2026

☐ Packaging recyclability pathway documented — verified route, not a marketing claim

AUG 2026

☐ OR: Packaging certified recyclable by design per PPWR recyclability criteria

☐ OR: Reuse pathway documented — dispensing system with recorded refill cycles

☐ Supplier provides written recyclability declaration per packaging SKU

☐ No single-use miniature formats in the supply plan beyond January 2030

JAN 2030

Recyclable material type alone is not PPWR-compliant. A small HDPE bottle that cannot be sorted in practice fails the standard. Packaging must demonstrate a verifiable collection-to-processing pathway — or a documented reuse cycle.

04 INSPECTION DOCUMENTATION

HOTEL / PROPERTY

Retrievable within 24 hours

☐ Supplier compliance declarations — current, signed, per product

☐ CPNP notification numbers on file — for each product as supplied to this property

☐ Safety assessment (CPSR) reference per product

☐ Packaging recyclability evidence — supplier declaration or certification document

☐ Refill protocol document on file (if operating dispensing system)

☐ All documents retrievable without contacting supplier first

05 BALEARIC CIRCULARITY PLAN

HOTEL / PROPERTY

Decree-Law 3/2022 · 50+ rooms

☐ Annual Circularity Plan prepared (required: 50+ rooms, resorts, multi-property licences)

☐ Local / zero-kilometre sourcing % documented for amenity ingredients

Balearic botanicals (almond, rosemary, citrus, sea fennel) contribute to local sourcing percentage

☐ Waste reduction measures documented

☐ Packaging recyclability rates included in the Plan

☐ Plan available for Conselleria de Medi Ambient inspector on same-day request

Fine tiers: Minor €200–€3,000 · Serious €3,001–€30,000 · Very serious to €150,000. Missing Circularity Plan or CPNP documentation typically falls in the serious range. A documented transition plan in progress is a formally recognised mitigating factor under Decree-Law 3/2022.

06 THREE FRAMEWORKS · ONE BATHROOM

NOW · 2019 Balearic Law 8/2019 — single-use plastic amenities prohibited. In force for six years.	AUG 2026 PPWR general effect — packaging recyclability and reuse requirements apply EU-wide.	JAN 2030 PPWR Annex V — hotel amenity miniature format prohibited across the entire EU.
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