

A.I.S.E. POSITION ON REACH-EN-FORCE 6 (REF 6) report on classification and labelling of mixtures

17 December 2019

A.I.S.E., the International Association for Soaps, Detergents and Maintenance Products in Europe has been made aware of the publication today by ECHA, of the [REACH-EN-FORCE 6 \(REF 6\) report on classification and labelling of mixtures](#).

More time is needed for our sector to fully assess this comprehensive report. In the interim, our comments are:

- Our members are committed to placing products on the market that are safe for use by consumers and workers and which respect European Regulatory requirements.
- A.I.S.E. actively collaborates, with its membership and other downstream users of chemicals (via [DUCC](#)), to ensure that members are duly informed about the various pieces of legislation applicable to our sector and is committed to continue doing so.
- As an ECHA accredited stakeholder we are keen to engage in dialogue with ECHA and its enforcement forum to establish which results are directly applicable to our product portfolio. Clarity as to how enforcement authorities assessed the correctness of product classifications would be welcomed as multiple classification methods are permitted under CLP. We believe such a clarification would be helpful in better understanding the reported rate of incorrect classification of chemical products.
- A.I.S.E. has also engaged in various actions to improve the quality of the safety data sheet, both individually and via our collaboration with DUCC. For example, this has been shown by our active engagement with the Forum working group on the SDS where we are interested to continue engagement with relevant stakeholders. We continue to work on the topic, as further demonstrated by the work on Action 3 of the REACH Review on “Improving the workability and quality of extended safety data sheets” where we have committed to provide further resources.
- With DUCC we have spearheaded the creation of tools and activities to allow effective communication of safe use information throughout the supply chain like Use Maps and SUMIs ([Safe Use of Mixtures Information](#)). We continue to take this topic seriously and to provide input to the Forum and ECHA to ensure tools for communicating information on chemicals are effective and accurate.
- On liquid laundry detergent capsules, A.I.S.E. welcomes the generally positive findings regarding this product category. More than 90% were found to be classified and labelled correctly. Whilst we acknowledge that 78 % of the capsules tested were compliant with the closure request, we would also need to better understand the testing method that has been used for the survey. Our sector is committed to securing high safety measure for consumers and this has resulted in various voluntary measures by our sector since 2012. Through A.I.S.E. 's latest [voluntary Product Stewardship programme](#), current detergent capsules packaging goes beyond the requirements of CLP. Further, A.I.S.E. is supporting activities at ISO level to standardise various safety measures.

