

POSITION PAPER

Regarding various initiatives in Europe on “scoring” of detergents and maintenance products

3 March 2020

Background:

Over the last decade, various product scoring schemes by organisations and/or private businesses have emerged which are now particularly flourishing in the form of smartphone apps. Their claimed purpose is to help consumers choose better products for their health and the environment.

Whilst initially focusing on the food and cosmetics sectors, more recently these schemes have expanded into the detergent and maintenance products sector. The statement below conveys **various principles** which our industry supports in relation to this topic.

A.I.S.E.’s position :

1) The placing on the market of products in our sector is subject to a very comprehensive and rigorous EU regulatory framework which guarantees safety for consumers and the environment.

This framework includes numerous pieces of legislation which cover assessment of individual ingredients (REACH¹, Detergents and Biocidal Products² regulations), the evaluation of the finished product formulations (CLP³ and Detergents Regulation⁴) and foresees specific information on the label. These regulatory requirements are based on key scientific principles and are the outcome of a rigorous and thorough process involving experts from authorities, academia, industry and civil society at EU and national levels.

2) Our industry embraces and welcomes fast & effective access to product information for consumers through digital technology and expects to see this capability further integrated in the future regulatory framework.

Our industry has been active since 2004 with the mandatory declaration of ingredients online (as per Detergents Regulation) and is keen to pursue this journey further so as to convey relevant, reliable information to the public. To this end, we welcome the Commission’s efforts behind the

¹ REACH :Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)– [More info](#)

² BPR : Biocidal Products Regulation- [More info](#)

³ CLP : Classification, Labelling and Packaging (CLP) Regulation - [More info](#)

⁴ Detergents Regulation – [More info](#)

REFIT on chemicals and the Detergents Regulation review that aim to leverage online information and lead to the design of decluttered and more user-friendly on pack labels.

3) A.I.S.E. is not supportive of product “scoring” schemes or applications which follow solely an ingredient hazard-based approach and go beyond the EU regulatory chemical control framework, as they can be misleading to the public and create unnecessary concerns.

We disagree with a product assessment based on a hazard-only approach; instead, the principles of risk assessment should prevail, taking into account the hazardous properties of the ingredients as well as their concentration and level of exposure under actual conditions of use. Correct assumptions, complete and up-to date information and the relevant product formulation must be used. Furthermore, the performance of the product is very important. All ingredients in a product deliver a specific function; thanks to these, the product can perform its function in an optimal way (e.g. cleaning performance at low temperature, product stable during many months etc). When it comes to environmental profile, a holistic approach to the life cycle of the product, its benefits, as well as its main function (i.e. cleaning or disinfecting) must be taken into account. The [cleanright.eu resource](http://cleanright.eu) provide detailed explanation on the concept of hazard and risk, free of advertisement and without any naming of brands.

4) We believe we need to help consumers in Europe understand the EU regulations, read product labels and follow the advice provided and we are committed to continue using digital technology to excel in this area.

The portal www.cleanright.eu already serves this purpose i.e. it is the official on line resource for detergents and maintenance products in Europe and contains amongst other information references to the EU regulations that apply to our products. The URL is conveyed on billions of packs across Europe. Designed by experts for consumers, this trustworthy online resource on good housekeeping and cleaning at home offers comprehensive information on detergents and maintenance products, together with practical sound advice on how to use them safely and sustainably. A.I.S.E. is further exploring future options to increase transparency and enable consumer access to information through digital technology.

For more information:

A.I.S.E. is the International Association for Soaps, Detergents and Maintenance Products. Based in Brussels, A.I.S.E. has been the voice of the industry to EU regulators for over 65 years. Membership consists of 29 national associations across Europe, 17 corporate members and 11 value chain partners. Through this extensive network, A.I.S.E. represents over 900 companies supplying household and professional cleaning products and services across Europe. A.I.S.E. has a long history in leading voluntary industry initiatives that focus on sustainable design, manufacturing and consumption, product safety and safe use of products by consumers and professional customers.

www.aise.eu

www.cleanright.eu



ANNEX: The difference between hazard and risk

When dealing with the safety characteristics of chemical ingredients, it is important to understand the precise meaning of the terminology used. For example, many people use the terms hazard and risk as if they were interchangeable, **but in fact these words have very different meanings**. A chemical's **hazard** is its intrinsic ability to cause adverse effects. The **risk** is the likelihood that those effects will occur in the applications in which the chemical is used.

HAZARD	The way in which an object or a situation may cause harm to health and/or the environment
x	
EXPOSURE	The extent to which the likely recipient of the harm is exposed to, or can be influenced by, the hazard
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RISK	The chance that the harm will actually occur

Crossing the road, for example, is a hazardous action, since it could end up in an accident. But no one suggests banning it. In this example, the guidelines and safety measures under which the action is performed reduce the risk to acceptable levels. The same principle can be applied to chemicals.

For a chemical, a risk assessment must take into account not only the intrinsic hazards of that chemical but also how those hazards can be mitigated by limiting exposure to acceptable levels. It is therefore essential to provide information on chemicals based on hazards and risk assessments, in order to provide customers and end-users with a proper understanding of the safety issues involved.

By doing so, the industry demonstrates its commitment to the responsible use of its products, both for human safety and for the environment.

To manage risk, manufacturers of products that use chemical ingredients take into account the conclusions of the risk assessments when developing their formulas. Based on these conclusions, they determine how risk can be reduced, and communicate to customers and end-users the relevant information on how to use the product safely and the appropriate risk-reduction measures to take. This information is communicated through various channels, including the manufacturer's website, customer-care line and the label or packaging of the product itself.



Source: *cleanright.eu* 2020