CLASSIFICATION AND LABELLING OF DETERGENTS UNDER CLP

Securing a consistent harmonisation across Europe and an appropriate information to end-users
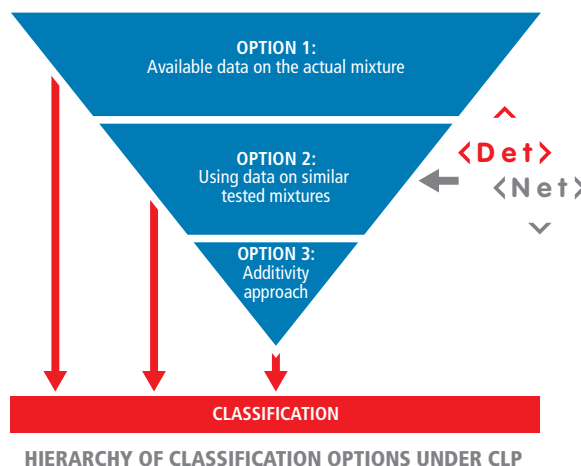
A.I.S.E. Fact sheet • December 2017

BACKGROUND: THE CLP REGULATION AND SAFE USE COMMUNICATION

- Since June 2015, the CLP regulation* has superseded the Dangerous Preparation Directive (DPD) for classification and labelling of mixtures for detergent and cleaning products in Europe.
- EU is the first region globally to use GHS criteria for classification and GHS pictograms for the labelling of consumer products – This first mover position presents a certain number of challenges.
- Aim of the regulation is that consumers and workers should be provided with relevant and adequate information that allows them to recognise the real hazard of a product and get relevant safe use guidance.
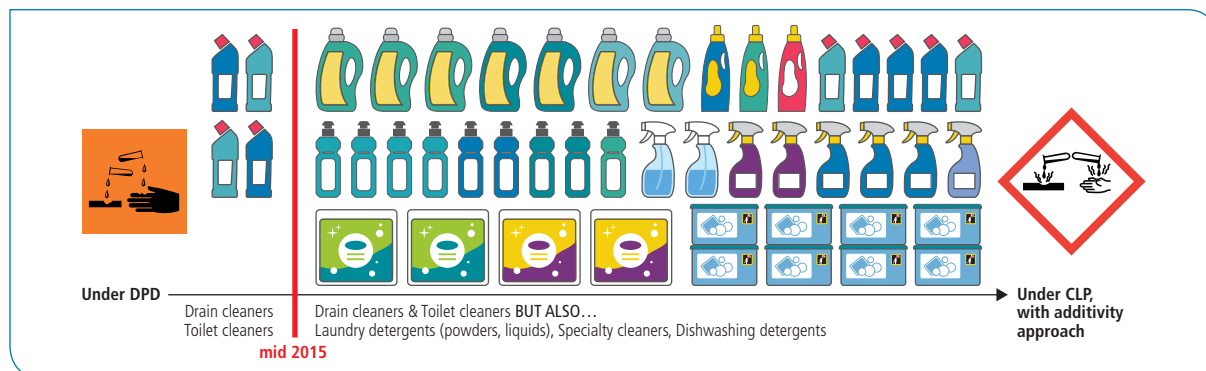
* Regulation on classification, labelling and packaging of substances and mixtures (EC) N° 1272/2008

THE ISSUE: POTENTIAL MORE SEVERE LABELLING BASED ON THE ADDITIVITY APPROACH

- CLP introduces important changes on the way data can be used for classification of mixtures (see graph aside).
- **By using the additivity approach** under CLP to classify and label products:
  › Many more daily use products are more severely classified and labelled
  › Labelling is not reflecting actual effects of products on man based on human experience (in particular for eye effects).

This would result in confusion and misleading communication for users, emergency services and potential higher risks of misuse by consumers and workers.

OPTION 1: Available data on the actual mixture

OPTION 2: Using data on similar tested mixtures

OPTION 3: Additivity approach

CLASSIFICATION

HIERARCHY OF CLASSIFICATION OPTIONS UNDER CLP

Under DPD Drain cleaners Toilet cleaners | mid 2015 | Drain cleaners & Toilet cleaners BUT ALSO… Laundry detergents (powders, liquids), Specialty cleaners, Dishwashing detergents | **Under CLP, with additivity approach**

The total household product portfolio which would be labelled corrosive, from DPD to CLP and using the additivity approach would move **from 6 to 55%**!! (Estimation- basis Euromonitor Value Sales 2016)

OUR COMMITMENT: AN APPROPRIATE CLASSIFICATION AND LABELLING OF DETERGENT PRODUCTS

Industry is committed to implement CLP in a way that allows consumers to:

- **Recognize the hazard accurately**
- **Distinguish between products of different hazards**
- **Understand a relevant and adequate label and act upon it**

OUR CONTRIBUTION: A COLLECTIVE NETWORK TO SHARE DATA FOR THE CLASSIFICATION OF DETERGENT PRODUCTS

Early 2014, after several years of development, A.I.S.E. launched **"DetNet"**, **the Detergent Industry Network for CLP Classification**, relying on a vast amount of relevant data (both *in vitro* and historical *in vivo*) on many tested mixtures and making use of weight of evidence with expert judgment or bridging principles.

LEGAL BACKGROUND:

CLP Regulation, Annex I (paragraph 1.1.0.):

"Suppliers in an industry sector may cooperate through formation of a network to share data and expertise when classifying substances and mixtures."

DetNet is:

- A unique tool based on the sharing of expertise and toxicological data
- An aligned industry approach to maximise the use of available data
- Reviewed by a Scientific Advisory Panel with recognised experts providing independent advice
- Transparent and open to authorities

⟨Det⟩
⟨Net⟩

DetNet enables :

- Appropriate and proportionate classification and labelling for consumers and end-users
- Optimisation of the use of existing data and avoidance of unnecessary testing
- Cost savings for Industry, and SMEs in particular
- Industry to stay innovative and competitive, delivering key products to society

DRAIN CLEANER
- Caustic
- Corrosive
- Child Resistant Closure
- Special Periodic Use

HAND DISHWASH DETERGENT
- No Effects in Use
- Used Every Day
- Left by Sink

LABELLING

DPD
- **Corrosive**
- **Irritant**

CLP
- Classification by additivity: **Danger** Skin Category 1
- Classification by additivity: **Danger** Eye Category 1
- Classification reflecting human experience, based on testing data and weight of evidence* **Warning** Eye Category 2

*Depending on formulation composition

By using the additivity approach under CLP to classify and label products, a hand dish detergent has to be labelled in a similar way to a drain cleaner

147 companies across EU

241 active experts

> 1370 mixtures classified with DetNet

AS OF DECEMBER 2017

www.det-net.eu

A.I.S.E.'S REQUEST:

› **Call to ECHA, Commission and Member States Authorities for a harmonised interpretation and application of the CLP criteria for classification and labelling, notably bridging principles.**