

CLEAR OPPORTUNITIES FOR DETERGENTS SECTOR DEMONSTRATED BY COMMISSION REVIEWS

Public statement

July 2019

A.I.S.E. welcomes the conclusions of the European Commission's review of the Detergents Regulation, and the findings of the recently published Fitness Check of the EU chemicals legislation (except REACH), which identify opportunities to improve hazard communication to consumers including through digital means.

Detergents and maintenance products help secure high levels of protection of human health through cleanliness and hygiene solutions. Product safety is of paramount importance to the industry, and all products placed on the market are compliant with European chemicals legislation which is the most ambitious and stringent legal framework in the world.

The implementation of the Detergents Regulation (Det. Reg.) by the industry has been a success particularly in terms of protection of human health, enabling consumers online access to the full list of ingredients, and environmental protection via enhanced biodegradability of surfactants, and development of phosphates-free formulations for consumer laundry and automatic dishwasher detergents.

Industry strongly welcomes action which will help provide clearer information to consumers by addressing the existing overlaps between the Det. Reg. and other pieces of EU chemicals legislation (Classification, Labelling and Packaging (CLP) Regulation, REACH, and the Biocidal Products Regulation (BPR)). These overlaps and inconsistencies often result in duplications in the labelling of substances and ingredients on detergents' labels, which have increased confusion for consumers (i.e. labels are overcrowded, difficult to understand, often not read) and been identified as important bottlenecks adding administrative burdens, complexity, and inefficiency for the industry.

The use of digital communication technologies (website, apps, QR codes, etc) could be opportune to support these objectives, but also help convey other relevant information such as sustainable consumption tips to consumers. As the use phase accounts for a significant part of the environmental footprint, the drive towards sustainable consumption habits by consumers is a priority in reducing the environmental footprint of detergents.

Similarly recognised by the conclusions of the Fitness Check, A.I.S.E. is also greatly supportive of the need to clarify how to apply CLP bridging principles method for the classification of mixtures. A.I.S.E. regrets however that the challenging implementation stemming from the requirements of the BPR are not identified for future action in the Commission assessment. Goldplating measures, and different interpretation of the BPR requirements at local level leads

to a lack of legal certainty and business predictability. A.I.S.E. is therefore calling for a uniform and harmonised interpretation of the legal requirements stemming from the European Regulation.

A.I.S.E. is ready to engage with Commission and Competent Authorities for improving the current legislative framework governing detergents on the basis of the EU Better Regulation Agenda principles, while maintaining the highest standards on safety and environmental performance.

SMARTER COMMUNICATION, BETTER PROTECTION & LOWER COSTS



TODAY
A complicated label,
with duplications &
inconsistencies



IDEALLY IN THE FUTURE
A simpler label,
with more
information online



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