

A.I.S.E. COMMENTS TO THE EVALUATION OF THE DETERGENTS REGULATION

Open public consultation on Regulation EC n. 648/2004

17 July 2017

A.I.S.E. and its member companies are committed to work proactively to further improve the sustainability profile of their products and services; this is led thanks to a combination of regulatory requirements (see below), complemented by individual but also voluntary industry initiatives (such as the Charter for Sustainable Cleaning, the compaction projects or sustainable use campaigns¹) delivering impactful results.

The implementation of Regulation No 648/2004 by the Detergents and Maintenance products sector has been a success particularly in terms of environmental protection via enhanced biodegradability of surfactants, promotion of the concept of “*standard washing machine load*” (enabling compaction of consumer laundry detergents) and development of Phosphates-free formulations for consumer laundry and automatic dishwasher detergents (though the environmental impact of this sector in terms of contributor to the eutrophication issue was considered minimal).

Nevertheless, new horizontal legislation governing the chemicals sector has been adopted in the meantime (REACH in 2006, CLP in 2008 and Biocidal product regulation in 2012) and this has resulted in a number of provisions that are overlapping in particular in terms of redundant labelling provisions for ingredients, allergenic fragrance substances and preservatives. This has also been acknowledged by the EU Commission 2016 Cumulative Costs assessment that has demonstrated that Detergents and Maintenance products sector is disproportionately affected by administrative costs and by the 2017 Regulatory fitness check on chemicals legislation (excluding REACH).

In the framework of the evaluation of Regulation No 648/2004 and of the Fitness check of chemicals legislation there is a unique occasion to address those shortcomings. The following actions are proposed for consideration:

- The reduction of the on-pack labelling list of ingredients and their related concentration ranges focusing on the elements relevant for consumers (including use of innovative communication technologies, such as digital means, websites, etc.)
- The modification of labelling requirements on allergenic fragrance substances in order to eliminate overlaps with CLP;
- The modification of labelling requirements on Preservatives in order to align with CLP and Biocidal Products Regulations and eliminate overlapping requirements;
- The modification of the requirements on the medical data sheet in consideration of the new Annex VIII of CLP (information to be provided to Poison centres).

¹ See [cleanright.eu](https://www.aise.eu/our-activities/sustainable-cleaning-78.aspx) and <https://www.aise.eu/our-activities/sustainable-cleaning-78.aspx>

The use of such innovative communication technologies could also be opportune to help convey other relevant information such as sustainable consumption tips to consumers, whose effect could be of great benefit for the reduction of the environmental footprint of detergents.

A.I.S.E. is ready to engage with Commission and Competent Authorities for improving the current legislative framework governing Detergents (Detergents Regulation, CLP, BPR etc.) on the basis of the Better Regulation agenda principles, while maintaining the highest standards on safety and environmental performance.

A.I.S.E., the International Association for Soaps, Detergents and Maintenance Products, is the official representative body of this industry in Europe. Our membership totals 29 national associations across Europe, 18 corporate members and 6 value chain partners. The A.I.S.E. network of members represents over 900 companies supplying both household and professional cleaning and maintenance products and services across Europe.

