Association Internationale de la Savonnerie, de la Détergence et des Produits d'Entretien
International Association for Soaps, Detergents and Maintenance Products

A.I.S.E. PRODUCT STEWARDSHIP PROGRAMME FOR LIQUID LAUNDRY DETERGENT CAPSULES

Harmonised Composition Sharing with Poison Control Centres[1]

Background

Following a number of accidental ingestion incidents with these products, especially by young children, A.I.S.E. has established a voluntary product stewardship programme (PSP) for liquid laundry detergent capsules. A key aspect of this programme is the collaboration with Poison Control Centres (PCCs) to enable better information exchange.

A.I.S.E. has developed a template for companies to share liquid laundry detergent capsules composition with Poisons Control Centres in a harmonised way. This template is based on the proposed EAPCCT guidance (2010) for product composition sharing under the CLP regulation, and takes into account the most recent discussions between the different stakeholders in 2011 and 2012. Further, it is taken into account that composition sharing should be initiated as soon as possible and as such, the format and content was targeted to be fully relevant for liquid laundry detergent capsules products, and implementable at short notice.

To note:

- Under CLP (as of mid 2015), harmonised composition sharing will be mandatory. Discussions regarding the relevant annexes to the CLP regulation are still ongoing, and will be completed by the end of 2013. It is recognised that the currently proposed composition sharing format for liquid laundry detergent capsules will be obsoleted once final and formal guidelines are issued regarding composition reporting under CLP.
- Where specific national requirements exist (either in terms of data to be shared, or in terms of formats or software to be used), these existing requirements prevail and should continue to be followed. If all elements of the PSP's harmonised composition sharing are already included in the existing requirements, or if the existing approaches require more detailed disclosure (e.g. exact levels), then the PSP approach should not be used (i.e. no duplication of the submission). If, on the other hand, the PSP approach contains additional information beyond what is already required, this information should be provided either within the existing formats (if possible), or otherwise as separate information.

Harmonised composition sharing approach

Product identification

For the company and product identification, as well as the product and packaging description, EAPCCT 2010 guidelines are integrally followed, except regarding the artwork / label - which is excluded from the proposed approach due to the practical feasibility. For the section 'toxicology', the EAPCCT guidelines state that relevant information on the toxicity of the mixture is important for Poison Centres and should be provided according to the Regulation 1907/2006 on the Safety Data Sheet. Providing more detailed toxicological assessments beyond what is in the SDS is currently not proposed.

[1] This document was amended on October 22, 2013, to replace any trademarked product descriptions by the generic term 'liquid laundry detergent capsules'.

Composition sharing

For the product composition, the 2010 EAPCCT guidelines, and further modifications to these guidelines as discussed in the context of CLP (European Commission stakeholder workshop on November 28-29 2012), are applied. Some additional modifications were made based on the need for short-term feasibility.

Different rules are applied to non-classified substances versus classified substances. Within the classified substances, a further differentiation is made between those considered to be of a high hazard and those not considered to be of high hazard. Substances considered to be of high hazard are those with either of the following classifications: acute toxicity (oral, dermal, inhalation), category 1, 2 and 3; STOT - single exposure, category 1 and 2; STOT - repeated exposure, category 1 and 2; skin corrosion, category 1A, 1B and 1C. Note that substances classified as 'serious eye damage, category 1' are not considered of high hazard for this purpose.

Ingredient disclosure

- Ingredients must be identified by their internationally accepted chemical names: in descending order of preference: the name as given in Part 3 of Annex VI of Regulation (EC) No 1272/2008; the name as given in the classification and labelling inventory (mentioned in Article 18(2) of Regulation (EC) No. 1272/2008); the name set out in the nomenclature provided by the IUPAC; another international chemical name.
- In addition, synonyms or common names shall be provided, as well as the CAS and EC number, if available.
- The functional group of each ingredient shall be provided.
- For each ingredient it shall be indicated whether it is classified, and if yes, the classification shall be included.
- If an ingredient is present in nano-form this shall be disclosed.
- For perfumes and dyes, the names "perfume" and "colouring agent" shall be used, instead of a more detailed disclosure.
- Enzymes shall be disclosed using the generic enzyme type (e.g. "protease", "lipase",…) without further detail and without further disclosure of the enzyme raw material constituents.
- In the case of substances occurring in nature, a chemical name or chemical names of the type "essential oil of ..." or "extract of ..." may be used instead of the chemical names of the components of that essential oil or extract.

Reporting thresholds

- For non-classified substances, no notification is needed when present <1%.
- For classified ingredients that are not intentionally added, the reporting threshold is 0.1 %, unless the substance has a "specific concentration limit" (SCL) smaller than 0.1 % and is present above this SCL.
- For classified ingredients that are intentionally added, there is a need to report, irrespective of the level.

Reporting of ingredient ranges

- Ingredients are reported using ranges. The definition of the ranges is flexible (i.e. the width of the range is prescribed, but the choice of the lower and upper level is flexible).
- By default, a flexible concentration range is suggested such that the actual level is in the middle of the range (with rounding to 0, 1 or 2 decimal places depending on the values). However, it is allowed to define a different range as long as the absolute width of the range is not modified, and the actual level is within the range.
- To note: whereas the A.I.S.E. format does not require to include the actual level in the composition disclosure, Companies have the liberty to provide this information to the PCCs in addition to ranges.

Non-classified substances		Classified substances			
		No high hazard		High hazard	
> 40 - ≤ 100	up to 20% points	> 40 - ≤ 100	up to 20 % points	> 25 - ≤ 100	up to 5 % points
> 10 - ≤ 40	up to 10% points	> 10 - ≤ 40	up to 10 % points	> 10 - ≤ 25	up to 3 % points
≥ 1 - ≤ 10	up to 3% points	> 1 - ≤ 10	up to 3 % points	> 2 - ≤ 10	up to 1 % point
		> 0.1 - ≤ 1	up to 0.5 % points	> 1 - ≤ 2	up to 0.5 % point
		≤ 0.1 *	up to 0.1 % points	> 0.1 - ≤ 1	up to 0.3 % point
				≤ 0.1 *	up to 0.05 % points

* cf. reporting thresholds for classified ingredients

Template

A.I.S.E. is making available a template in Excel™ workbook format.

This includes a formula entry sheet where all ingredients are to be added with their name, exact level, and further their CAS and EC number, functional identification, hazard classification, and whether they are present in nano form. For classified ingredients, it has to identified whether the ingredient is considered to be of 'high hazard' (as indicated above), and in case the exact level is below the default threshold: whether the ingredient is a and whether there is a specific concentration limit. The template will automatically apply the disclosure rules described above, and create a formula disclosure sheet. Ingredient ranges that have been set by default in this sheet, can be manually modified (within what is allowed) if needed.

The Excel™ workbook also contains a standardised template for the product description.

A description of the reporting rules, and specific instruction on how the template should be used are included.

Once completed with the relevant information, the product description and formula disclosure sheets can be used for notification to PCCs as such if this is acceptable. Alternatively, the sheets can be converted into an appropriate format (e.g. PDF) – or the information in the sheets can be transposed into other systems if this is required.

The template is only made available in English, hence, local translation may be required.

Embedded Excel™ workbook:	 Harmonized PCC reporting May 1 2013.ame

For multi-compartment products: where such effects have been considered / assessed, A.I.S.E. suggests to include, on a voluntary basis, a statement describing the potential mixture effects as the content from the different compartments may become mixed upon ingestion of the detergent capsule.[2]

Implementation timing

The harmonised format is made available to the Companies as of April 15, 2013, and shall be implemented (where relevant) for product notifications as of June 1, 2013. It should be taken into account that where applicable, existing national requirements prevail over the A.I.S.E. harmonised format.

To note: composition sharing is only required between companies and PCCs. Product composition data shall not be exchanged between companies.

National PCCs will be made aware via the national detergent associations before the end of May 2013. The reporting format will also be shared with the EAPCCT for information.

Feedback from the national PCCs and the EAPCCT will be sought during the second half of 2013, once they have been able to experience this new composition sharing approach in practice.

[2] This paragraph was added on October 22.

This template has been developed by A.I.S.E. as a tool for companies to report product composition to poison control centers with a view to facilitating harmonized reporting. It is made available free of charge to any company and it cannot be used for commercial exploitation. Its use by companies shall be voluntary. When using the template companies shall follow the guidelines for use. This template does not supersede any existing legal requirements. A.I.S.E. assumes no liability for the use made by any person or company.