International Association for Soaps, Detergents and Maintenance Products

A.I.S.E. Q&A ON MICROPLASTICS RESTRICTION

For reactive use only in case of media enquiries

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It should be considered as a living document that can be updated, if needed, by sharing with A.I.S.E. questions received where a harmonized response would be useful.

Key messages:

- ***Scientific evidence clearly indicates that the vast majority of small plastic particles (microplastics) present in the world's seas and waterways derives from the breakdown of larger plastic materials[1].***
- ***Detergents and maintenance products have not been identified as key contributors to marine litter in the 2016 European Commission "Study to support the development of measures to combat a range of marine litter sources" [2].***
- ***The detergents and maintenance products sector traditionally makes very limited use of materials that could qualify as microplastics according to the latest ECHA definition.***
- ***The definition developed by ECHA has been a moving target in the past. However, A.I.S.E., the EU detergents and maintenance products association, is now satisfied with the direction the definition is moving into, which is based on scientific research and stakeholder consultations.***
- ***A.I.S.E. and IFRA Europe have been leading in the work for a consideration of scientific criteria for biodegradability derogation.***
- ***The sector is committed to contributing responsibly and has already been actively investing in Research and Development in materials that do not ultimately contribute to a marine litter issue. Innovation is key for the sector, and technologies such as encapsulated fragrances for example allow for important benefits such as reduced use of ingredients and fragrances overall.***
- ***Guidance will be needed in the future on the REACH restriction. A.I.S.E. will remain available to contribute and share expertise.***

[1] Report by EUNOMIA for European Commission DG Environment, January 2016
Report by EUNOMIA for the European Commission, DG Environment, February 2018

[2] Report by EUNOMIA for European Commission DG Environment, January 2016

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Q1: Do Detergents and maintenance products contain microplastics?

Detergents and maintenance products have not been identified as key contributors to marine litter in the 2016 European Commission *"Study to support the development of measures to combat a range of marine litter sources".* This sector traditionally makes very limited use of materials that could qualify as microplastics.

A first assessment confirms that a few ingredients (certain solid, insoluble plastic particles) could be covered by the scope of this EU restriction; quantities used are very limited to carry out specific functions, a more accurate assessment is being carried out. The detergents and maintenance products sector undertakes substantial investments in research and development of alternative solutions in order to contribute to reducing small plastic particles present in the world's seas and waterways. Furthermore, it is engaged in a continued dialogue with public authorities to support their ambition in finding an adequate way of dealing with the issue.

Q2: Why and in which products do you use microplastics?

Detergents and maintenance products are formulated by mixing several ingredients, each one with a specific function, e.g. stain removal, dye transfer inhibitor, anti-redeposition, surface protection etc. In a few cases some ingredients could potentially qualify as microplastics according to the latest definition provided by ECHA.

A.I.S.E.'s preliminary assessment indicates that the following ingredients could potentially qualify as microplastics, but it should be noted that there is no final decision yet on the definition:

- Microbeads. To achieve an abrasive effect, some ceramic or glass surface cleaners can contain solid, insoluble plastic particles mainly for gentle cleaning of hard surfaces such as ceramic/glass. Their use has been decreasing constantly in recent years and in 2018, A.I.S.E. estimated a residual use of about 60 tonnes per year on the whole European market (estimation via company survey).
- Opacifiers. Solid synthetic plastics can be added to impart a milky and lotionized appearance to some household liquid products. This is often used to give a cue for product attributes: mild products, sensitive skin etc.
- Encapsulated fragrances. The encapsulation of perfumes in fabric enhancers, detergents and in wash scent beads helps achieve a long-lasting scent whilst reducing significantly the quantity of perfume used. This has wider environmental benefits from the more efficient use of perfumes and reduction of wash frequency, while reducing final cost for consumers.

Q3: What is the sector doing for microfibres released through washing cycle?

A.I.S.E. is actively engaged on the topic of secondary microplastics to address potential marine pollution stemming from microfibre release from textiles. A "Cross-Industry Agreement" was developed by a group of European industry associations representing the global value chain of garments and their associated maintenance. This Agreement – referred to in the EU Strategy for Plastics – supports the need for further investigation and a better understanding for the prevention of microplastic release into the aquatic environment during the washing of synthetic textiles. It also aims to find feasible solutions based on science and research, which can effectively be applied by industry, consumers, and authorities.

Although not part of the textiles industry nor a direct contributor to the release of (secondary) microplastics, A.I.S.E. is an active stakeholder in the Cross-Industry Agreement, as future solutions may largely be dependent on collaborative processes in the value-chain, and detergents and softeners may potentially play a role in reducing friction and shedding of fibres during a wash cycle. It is known already that washing with full loads and washing at low temperature helps reduce the shedding of fibres during a wash cycle.

Q4: What are you doing as detergents industry to combat microplastics?

A.I.S.E. has consistently supported the scientific process initiated by the European Commission through the European Chemicals Agency (ECHA) since its launch in 2017. In 2018, A.I.S.E. has also engaged more specifically with the Swedish Chemicals Agency (KEMI) in charge of estimating the potential use of ingredients qualifying as microplastics in the detergents sector.

In addition to engaging with policy-makers, A.I.S.E. has also participated in the development of a voluntary initiative to address marine pollution stemming from secondary microplastics. A "Cross-Industry Agreement" was developed, which supports the need for further investigation and a better understanding for the prevention of microplastic release into the aquatic environment during the washing of synthetic textiles. It also aims to find feasible solutions based on science and research, which can effectively be applied by industry, consumers, and authorities.

A.I.S.E. has a long track record of leading the industry in proactive, voluntary initiatives to ensure safety and steer sustainability progress for products placed on the market. This is done through several projects where A.I.S.E. members engage across the value chain with partners from industry, academia and regulatory bodies to share knowledge, set ambitious standards and operate anticipating legislative requirements. Some examples include the A.I.S.E. Charter for Sustainable Cleaning, looking at the Advanced Sustainability Profile of product formulations (including polymeric ingredients) and the CIA agreement on secondary microplastics mentioned above.

Q5: Do detergents harm our health and environment?

Detergents are subject to an extensive set of legislations; among others, all products fulfil the provisions of the EU Detergents Regulation (648/2004) and REACH (1907/2006). According to these Regulations, detergents products must use biodegradable surfactants (main ingredients). In addition, their ingredients must undergo a risk assessment to ensure ingredients in detergents and maintenance products do not pose any risk to human health or the environment.

With regard to the environmental impact in the use of detergents and maintenance products, the ingredients used are eventually released into the wastewater stream and with it into the wastewater treatment system. However, the majority of these ingredients do not reach the marine environment due to abatement carried out at wastewater treatment plants to treat effluent water (more than 90% removal).

Q6: Why don't you stop the use of microplastic immediately? Why have you waited for legislation to act / stop using those ingredients?

Detergents and maintenance products have not been identified as key contributors to marine litter in the 2016 European Commission "*Study to support the development of measures to combat a range of marine litter sources*". Scientific evidence suggests that the vast majority of small plastic particles present in the world's seas and waterways come from the breakdown of bigger plastic materials, i.e. secondary microplastics. The definition of what constitutes a microplastic has been evolving and, while the sector is assessing the impact of the definition proposed by ECHA, scientific evidence of the potential adverse effects of microplastic accumulation in the environment is still limited.

A.I.S.E. is assessing what can be done to tackle its contribution to the issue at stake. It has to be noted that some of the ingredients potentially qualifying as microplastic deliver essential functions; hence, investments towards reformulation can be made only if and when alternative ingredients are available. Stopping their use if no other ingredients are available as alternative could therefore affect the performance of the product. Where alternatives are known, new ingredients can be used in products only after testing ensures they are safe and qualified according to legal requirements. This is a lengthy process that can take time. We therefore need appropriate transition deadlines to reformulate products and deliver safe, reliable and functioning products that meet the needs of our consumers.

Ingredients potentially qualifying as microplastics are used in detergents and maintenance products for some critical applications, each one with a specific function, e.g. stain removal, dye transfer inhibitor, anti-redeposition, surface protection etc. For instance, encapsulated fragrances help to significantly reduce the quantity of perfume used and can reduce frequency of washing. This has wider environmental benefits, while reducing final cost for consumers.