

Revision of the Detergents Regulation

Fields marked with * are mandatory.

Introduction

Detergents are products that hold a central role in our everyday lives. From laundry detergents and fabric softeners to dishwashing and all-purpose/surface cleaners, detergents are products that help deliver health and hygiene in almost all areas of human activity. Apart from household products, detergents are also used professionally to deliver health and hygiene in places such as hospitals, restaurants and industrial settlements.

The specific rules that detergents need to comply with in order to move freely in the internal market are set in the [Detergents Regulation](#). In 2019, the European Commission carried out an [evaluation of the Detergents Regulation](#). A number of weaknesses and aspects that can be further improved both within the Regulation itself and in the overall regulatory framework that applies to detergents, were identified. This includes some new developments and marketing trends in the single market that the Regulation does not account for (e.g. microbial cleaning products, refill sale of detergents); overlaps in the information requirements for detergents such as duplications in the labelling requirements; and the presence of some potentially harmful ingredients in detergents e.g. phosphorus in professional detergents.

The objective of this initiative is therefore to capture the views from a broad and large number of stakeholders on the identified problems and on the potential ways of addressing them in order to improve the existing legislation on detergents. This consultation will further ensure the appropriate involvement of all affected actors and will contribute to better understanding the implications of the possible policy options aiming to address the identified problems.

About you

* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English

- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

If other, please explain

200 character(s) maximum

* First name

Anna

* Surname

MELVÅS

* Email (this won't be published)

anna.melvas@ktf.se

* Organisation name

255 character(s) maximum

BPHR: Branschföreningen Professionell Hygien & Rengöring och KoHF: Kosmetik- och hygienföretagen

* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

* Country of origin

Please add your country of origin, or that of your organisation.

- | | | | |
|--------------------------------------|--|-------------------------------------|--|
| <input type="radio"/> Afghanistan | <input type="radio"/> Djibouti | <input type="radio"/> Libya | <input type="radio"/> Saint Martin |
| <input type="radio"/> Åland Islands | <input type="radio"/> Dominica | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Pierre and Miquelon |
| <input type="radio"/> Albania | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania | <input type="radio"/> Saint Vincent and the Grenadines |
| <input type="radio"/> Algeria | <input type="radio"/> Ecuador | <input type="radio"/> Luxembourg | <input type="radio"/> Samoa |
| <input type="radio"/> American Samoa | <input type="radio"/> Egypt | <input type="radio"/> Macau | <input type="radio"/> San Marino |

- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar/Burma
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland
- Syria
- Taiwan
- Tajikistan

- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States
- United States Minor Outlying Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela

- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena
Ascension and
Tristan da Cunha
- Saint Kitts and Nevis
- Saint Lucia
- Vietnam
- Wallis and Futuna
- Western Sahara
- Yemen
- Zambia
- Zimbabwe

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the [personal data protection provisions](#)

General Questions

Question 4

How familiar are you with the Detergents Regulation?

- Very familiar
- Fairly familiar
- Slightly familiar
- Not familiar at all

Question 5

Please indicate the market(s) you are active on

- Local market
- Regional market
- EU market
- Global market

Question 6

Please specify the type of product your organisation produces or represents

- Intermediate product (e.g. ingredient or component for a detergent)
- Final product (detergent)
- Both intermediate and final products
- Other

Question 7

Please specify where in the supply chain you operate

- Manufacturer
- Distributor
- Retailer
- Importer
- Other

Dosage instructions

The labels of laundry detergents and automatic dishwasher detergents for consumer use contain instructions on recommended dosages. These instructions aim at preventing product overuse thus reducing the amount of detergent that enters the environment and optimising the number of washes for consumers.

Question 8

Please state which of the following statements better represents your views on the above mentioned dosage instructions for consumer laundry and dishwasher detergents:

- The dosage instructions should be simplified and/or become clearer for consumers
- I don't read dosage instructions
- The dosage instructions are clear and simple enough
- I was unaware of these recommended dosages
- I don't know/Cannot answer

Please explain

We believe that current the dosage instructions are clear and comprehensible to the consumer. But there should be a possibility in the regulation to adapt dosage instructions to be able to include future innovations, product developments, larger loads or similar.

Refill sale of detergents

The refill sale of detergents is a recently developed practice based on which consumers refill either their own bottle from a larger container or a specific pre-labelled receptacle recognised by automatic distributors. The main problem with this practice is that very often the bottle used either has no label or bears the wrong label (e.g. the consumer reused a previous detergent bottle from a different brand). As a result, consumers do not receive the necessary information as required under the CLP and the Detergents Regulations, which could be crucial in case e.g. of an accident.

Question 9

Should the Detergens Regulation be amended in order to acomodate the new practice of refill sale of detergents?

- Yes
- No
- I don't know/Cannot answer

Question 10

What would be the impacts of setting rules for the refill sale of detergents?

- It would have a positive impact on the environment
- It would increase costs for companies selling refill detergents
- It would improve consumer safety
- It would have detrimental effects on human health

- It would yield positive results for the detergents industry
- It would give a competitive advantage to the EU market for detergents
- It would have negative impacts on sales of refill detergents
- Other
- I don't know/Cannot answer

If other, please explain

Setting rules for refill sales would mean an additional regulatory burden for the detergent industry. We believe that the issue of labelling and consumer information can be handled by clarifying the current rules and by enabling digitalization of consumer information.

Ambiguous definitions

The Detergents Regulation defines 'detergent' as any substance or mixture containing soaps and/or other surfactants intended for washing and cleaning processes. Detergents may be in any form (liquid, powder, paste, bar, cake, moulded piece, shape, etc.) and marketed for or used in household, or institutional or industrial purposes.

Other products that are also considered as detergents are:

- 'Auxiliary washing mixture', intended for soaking (pre-washing), rinsing or bleaching clothes, household linen, etc.;
- 'Laundry fabric-softener', intended to modify the feel of fabrics in processes which are to complement the washing of fabrics;
- 'Cleaning mixture', intended for domestic all purposes cleaners and/or other cleaning of surfaces (e.g.: materials, products, machinery, mechanical appliances, means of transport and associated equipment, instruments, apparatus, etc.);
- 'Other cleaning and washing mixtures', intended for any other washing and cleaning processes.

It has been reported that some of the above-mentioned definitions are unclear and/or open to interpretation. This results in lack of clarity on whether some of the products available on the market fall under the scope of the Regulation or not.

Question 11

In your view, is it always clear if a product is a detergent or not within the meaning of the Detergents Regulation?

- Yes
- No
- I don't know/Cannot answer

Question 12

What would be the impacts of clarifying the definitions currently provided under the Detergents Regulation?

- It would provide legal certainty as to which products fall under its scope
- It would facilitate the work of detergents manufacturers and Member States' authorities
- It would not yield any benefits for the detergents manufacturers or the Member States' authorities
- It would be too complicated for manufacturers and Member States' authorities to adapt to a new definition
- It would level the playing field for detergents manufacturers
- It would help manufacturers place their products on the market and export them within the EU more easily
- I don't know/Cannot answer

Microbial cleaning products

In recent years products containing living microorganisms have been developed. These are often referred to as 'microbial cleaning products'. The fact that these products contain living microorganisms raises concerns on their potential impact on human health (e.g. possible presence of unwanted microbes, pathogens and issues related to chronic respiratory exposure to them) and the environment (e.g. release into the environment of microorganisms that do not originate from such environments).

Question 13

In your understanding, are any microbial risks related to microbial cleaning products addressed?

- Yes, the risks are addressed under the Detergents Regulation
- Yes, the risks are addressed under another regulatory framework
- Yes, the risks are addressed based on voluntary schemes by the industry
- Yes, the risks are addressed by means other than those listed above
- No, the risks are not managed anywhere
- I don't know/Cannot answer

Please explain

Microbial Cleaning Products are regulated by several legislative schemes depending on the use and function of the product. Both the Detergent regulation and the Biocide regulation can be applied for the products depending on their function.

Consumer products are also regulated by the Product Safety Directive that stipulates that only safe products can be put on the market. Professional products are regulated by e.g. Biological agents at work but also through national legislation on health and safety in the working environment.

Question 14

In case that the microorganisms are not biocidal active substances under the Biocidal Products Regulation, are any risks related to their use in detergents addressed in any of the following pieces of EU legislation?

- In the [Classification, Labelling and Packaging Regulation \(the 'CLP' Regulation\)](#)
- In the [Detergents Regulation](#)
- In the [General Product Safety Directive](#)
- Other
- They are not addressed in any other piece of EU legislation.
- I don't know/Cannot answer

Please explain

Question 15

In case you think that further risk management measures are necessary to introduce in the Detergents Regulation in order to ensure the safe use of microbes in detergents, what sort of measures would you suggest?

- Labelling requirements
- Generic criteria for the use of microbes in detergents
- A scheme for individual, product-specific risk assessment
- Other
- I don't know/Cannot answer

Please explain

We see a need for a consumer friendly, language neutral, way to communicate on these ingredients to the consumer. This could preferably be developed through an industry guidance or similar.

Question 16

What would be the impacts of introducing risk management measures for microbial cleaning products in the Detergents Regulation?

- It would provide enhanced environmental protection
- It would better protect human health
- It would impose an unnecessary regulatory burden
- Other

- I don't know/Cannot answer

Please explain

Question 17

Are there any other changes that you think are necessary in the Detergents Regulation for micorbial cleaning products? Please explain.

Information to poison centres and ingredient data sheets

In 2020, new rules became applicable under the Classification, Labelling and Packaging Regulation ('CLP') based on which hazardous ingredients in detergents must be notified to poison centres. These rules do not apply to non-hazardous detergents.

Question 18

In your view, should the ingredient data sheet for non-hazardous detergents be maintained under the Detergents Regulation?

- Yes
 No
 I don't know/Cannot answer

Please explain

We believe that the ingredient data sheet is very seldom used. The regulation should be amended so that the ingredient data sheet is not demanded for professional products or for products that are reported according to Annex VIII in CLP by legal demand or on a voluntary basis.

Question 19

What would be the impacts of maintaining the ingredient data sheet for non-hazardous detergents under the Detergents Regulation?

- It would provide a high level of protection of human health
 It would impose an unnecessary regulatory burden to the detergents industry
 It would have no value added
 It would add complexity to the regulatory framework applicable to detergents
 Other
 I don't know/Cannot answer

If other, please explain

By keeping the ingredient data sheets for non-hazardous mixtures it would also keep an adequate level of safety for the products. Please see answer in Q18.

Question 20

If the ingredient data sheet for non-hazardous detergents is maintained, should it be aligned with the format for providing information to poison centres under the CLP Regulation or should its current format be maintained?

- It should be aligned with the CLP format
- Its current format should be maintained
- Other
- I don't know/Cannot answer

Question 21

What would be the impacts of aligning the ingredient data sheet for non-hazardous detergents with the format for providing information to poison centres under the CLP Regulation?

- It would increase the human health protection
- It would add an unnecessary regulatory burden to the industry
- It would be too complicated
- It would have no added value
- Other

Please explain

Phosphorus limitations and biodegradability of non-surfactant organic ingredients

The Detergents Regulation requires surfactants to fully biodegrade. This could have a negative impact on the environment.

Another negative impact on the environment could result from the lack of limit values for phosphorus in professional detergents and/or in consumer hand-dishwashing detergents. The current rules already foresee phosphorus restrictions for two types of consumer detergents, namely for laundry and automatic dishwasher detergents. These restrictions were introduced in an attempt to reduce the contribution of phosphorus to serious environmental problems such as eutrophication.

Question 22

Do you consider that biodegradability requirements for non-surfactant organic ingredients should be introduced in the Detergents Regulation?

- Yes
- No
- I don't know/Cannot answer

Please explain

The industry is already engaged in this area on a voluntary basis.

Question 23

In your view, should the phosphorus limitations be expanded to professional detergents?

- Yes
- No
- I don't know/Cannot answer

Please explain

An expansion of the phosphorous limitations to the professional detergents will lead to that certain applications and specific products will be lost. The professional detergent industry has already adapted and decreased the use of phosphorous in many products, but for certain applications there is no alternative. We believe it is too early to set a definite restriction or limitation for the professional products.

Question 24

In your view, should the phosphorus limitations be expanded to consumer hand dishwashing detergents?

- Yes
- No
- I don't know/Cannot answer

Please explain

Hand dishwashing products containing phosphorous is not common in the market.

Question 25

In your view, what would be the impacts of

	It would better protect the environment	It would impose an unnecessary regulatory burden for the detergents industry	It would not be feasible from a technical point of view	It would foster innovation	It would have no added value	It would increase the price of these products	Other	I don't know /Cannot answer
Expanding the phosphorus limitations to professional detergents	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Expanding the phosphorus limitations to hand dishwashing detergents	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Adding biodegradability requirements for non-surfactant organic ingredients	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please explain

Overlaps in the labelling of ingredients

Detergents ingredients are often labelled twice due to overlapping requirements in the different pieces of legislation that are applicable to detergents. This is for example the case of allergenic fragrances where an overlap exists between the requirements of the [CLP](#) and the [Detergents Regulation](#) for these substances. Apart from the CLP Regulation, some overlaps have also been identified with the [REACH](#) and [Biocidal Products Regulations](#).

Question 26

When labelling requirements according to several pieces of legislation including the Detergents Regulation (i.e. the CLP Regulation or the Biocidal Products Regulation) are overlapping, do you think that these should be streamlined to allow that the relevant substance is labelled only once in accordance with the stricter applicable rules?

- Yes
- No
- Other
- I don't know/Cannot answer

Question 27

What would be the impacts of streamlining the labelling requirements for detergents?

- It would provide clarity for consumers
- It would increase the effectiveness of detergents labels
- It would not have any value added
- I don't know/Cannot answer
- It would reduce the labelling costs
- It would significantly simplify the regulatory framework applicable to detergents

Please explain

We support streamlining of the labelling requirements for detergents, both consumer products and professional products. For professional products there is an extra complexity since labelling elements also need to be included in the Safety Data Sheet, and it is not clarified in the regulation how to handle that.

There is a need to address professional products specifically when streamlining the labelling requirements.

We also support the comments sent by the European detergent association A.I.S.E.

Legislative instrument

Question 28

In your view, should the Detergents Regulation be repealed and the material content be included in horizontal pieces of chemicals legislation (i.e. mainly the REACH and CLP Regulations), in order to simplify the regulatory framework for chemicals?

- Yes
- No
- I don't know/Cannot answer

Please explain

The regulation works well as it is, but needs to be amended regarding streamlining of labelling requirements, as well as allowing digital means of communicating information.

Question 29

Are there any other changes that you would like to see in the Detergents Regulation? Please explain

If you have additional information that you would like to share in a concise document such as a position paper (this is optional and will serve as additional background to better understand your position), please add this below.

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

Contact

GROW-F2@ec.europa.eu

