



# EU REGULATORY UPDATE

Jan Robinson, Scientific & Regulatory Affairs Director

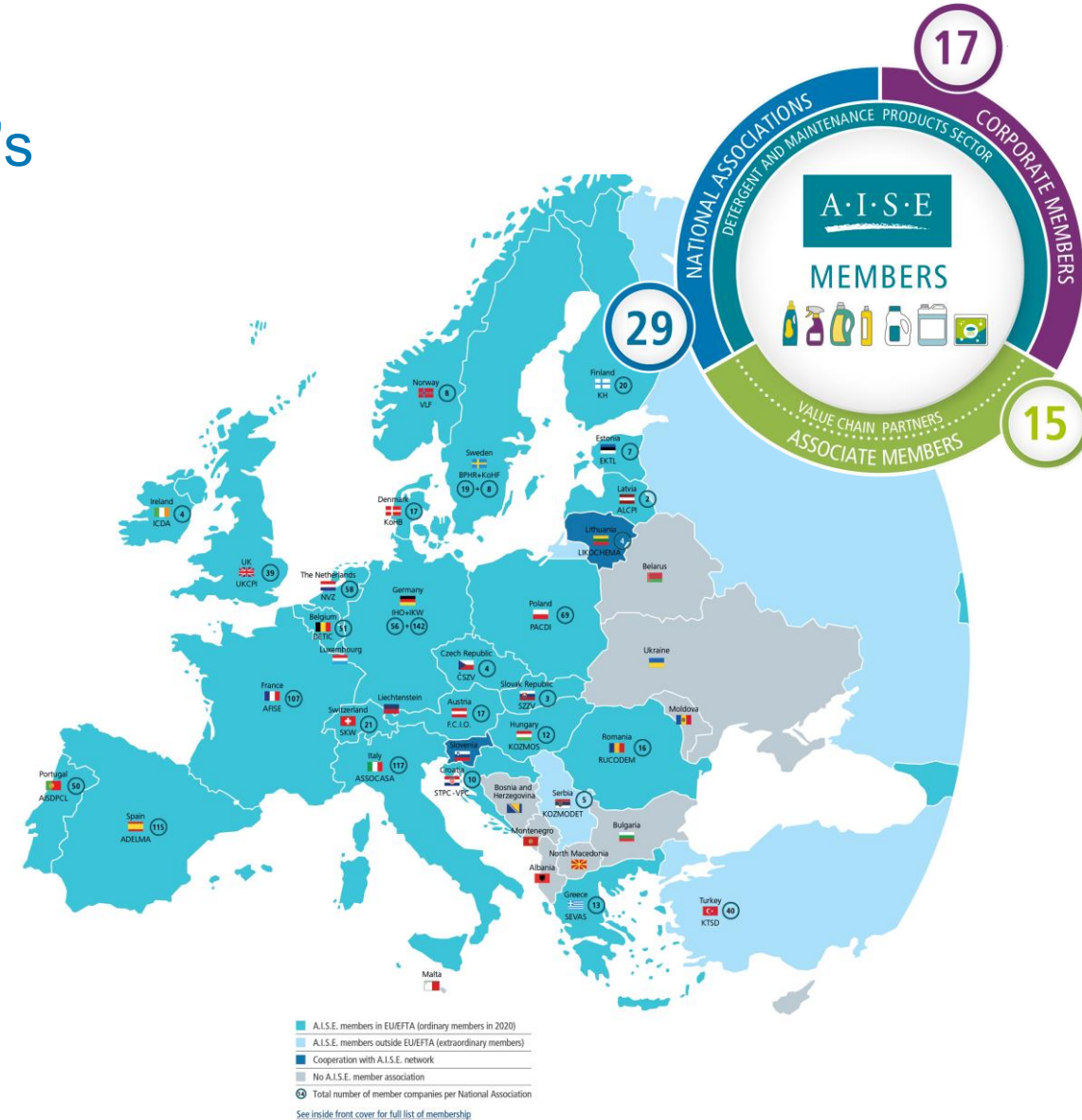
UKCPI Regional Meeting  
15 March 2023



# A.I.S.E. – THE INTERNATIONAL ASSOCIATION FOR SOAPS, DETERGENTS & MAINTENANCE PRODUCTS



- Representing a crucial industry for people’s hygiene, health and well-being: Detergents and maintenance products
  - For household
  - and professional uses
- The voice of the industry to EU regulators for **70 years**
- A strong network of over 900 companies
- A key contributor to the EU economy: **€ 39.8 billion** market value in 2021





# UNPRECEDENTED NUMBER OF REGULATIONS AHEAD




**Before 2020:  
over 50 years**

**'60s: DANGEROUS SUBSTANCES DIRECTIVE**

**'90s: BIOCIDES DIRECTIVE  
DANGEROUS PREPARATIONS DIRECTIVE**

**'00s: REACH  
CLP  
DETERGENTS REGULATION**

**'10s: BIOCIDES PRODUCTS REGULATION**

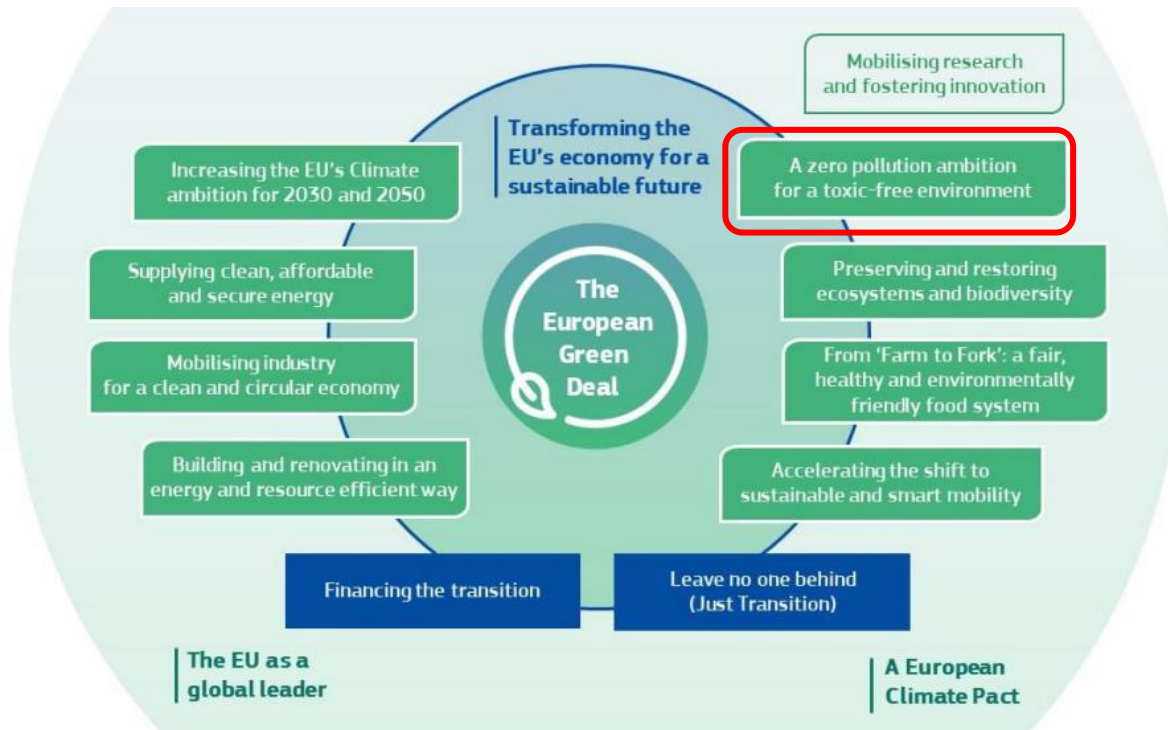


**2020 - 2030  
in 10 years**

**ECODESIGN for SUSTAINABLE PRODUCTS  
SAFE AND SUSTAINABLE BY DESIGN  
PACKAGING AND PACKAGING WASTE  
UNFAIR COMMERCIAL PRACTICES  
GREEN CLAIMS  
DETERGENTS REGULATION  
CLP  
REACH  
ZERO POLLUTION  
WASTE  
BIOCIDES  
URBAN WASTEWATER TREATMENT  
CLIMATE CHANGE & DEFORESTATION**



# REGULATORY CONTEXT



European Commission



European Commission

- Revision of CLP
- Revision of REACH
- *Revision of Detergents Regulation*



# REVISION OF CLP: TIMELINE

May 2021

Roadmap

August 2021

Public Consultation

Autumn 2021

Meetings & Consultations

May 2022

Opinion of Regulatory Scrutiny Board (RSB)



Ad hoc CARACAL  
Targeted Stakeholder Survey

Positive with reservations



# REVISION OF CLP



## December 2022

1. Legislative proposal

2. Delegated act on new hazard classes & criteria

1) + 2) adopted by European Commission



## Q1- Q4 2023

European Parliament & Council of the EU

Develop their positions

European Parliament

Lead Committee: ENVI

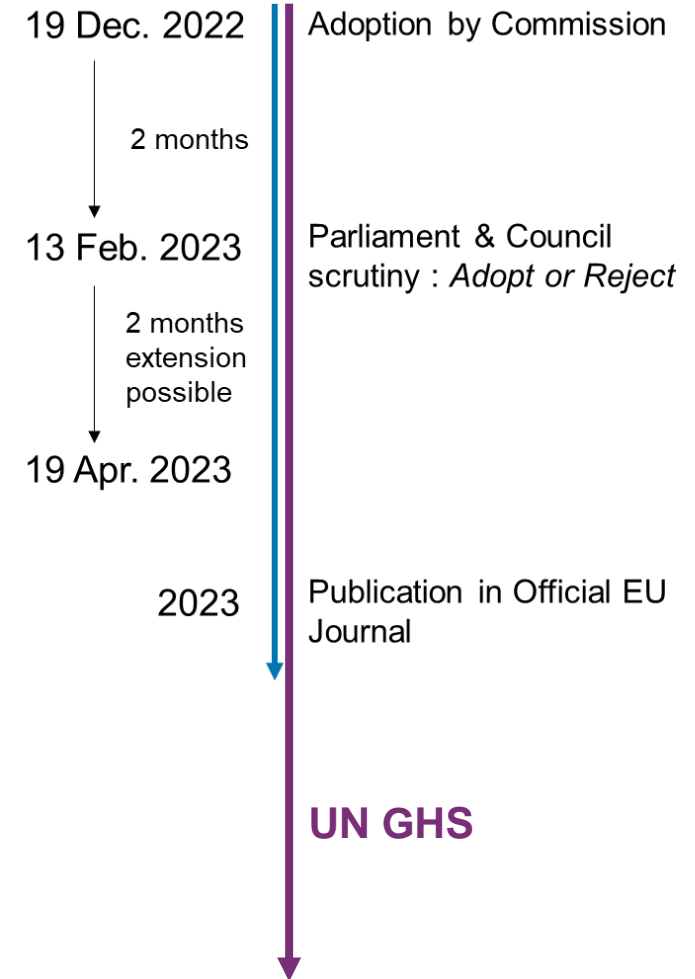
Opinion Committee: IMCO, ITRE

Council

Working Group “Technical Harmonisation”

# NEW HAZARD CLASSES (DELEGATED ACT)

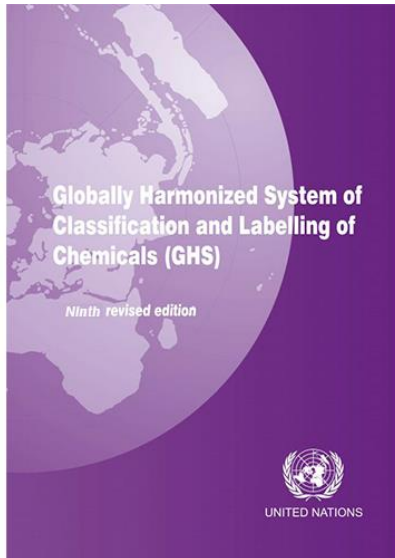
- Endocrine disruptors (Categories 1 & 2)  
- for human health and the environment
- Persistent, bioaccumulative and toxic (PBT) or very persistent and very bioaccumulative (vPvB)
- Persistent, mobile and toxic (PMT) or very persistent and very mobile (vPvM)





# NEW HAZARD CLASSES → UN GHS

43<sup>rd</sup> session of UNSCEGHS | Dec. 2022: [report here](#)



- Topic added to work programme of 2023-24 (*but likely to take >1 biennium*)
- New Informal Correspondence Group: “**Potential hazard issues and their presentation in the GHS**” - terms of reference [here](#)
- Current workstreams:
  - (a) Develop a **mandate to the OECD** on the science needed to identify **endocrine disruptors**, for Sub-Committee approval  
→ *working document being drafted for 44<sup>th</sup> session, July 2023*
  - (b) Determine ICG **priorities** and develop an agreed 2023-2024 **workplan** for Sub-Committee approval → *survey; informal document for 44<sup>th</sup> session*
- A.I.S.E. is participating and will nominate experts for individual workstreams
- Ongoing reflection: what are our preferred outcomes at GHS?

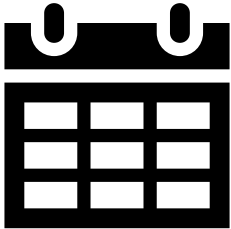
# KEY ELEMENTS OF THE CLP REVISION PROPOSAL



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2. Advertising



3. Deadlines to update information on labels



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4. Digital labelling

1. Format / Minimum dimensions of labels



# KEY ELEMENTS OF THE CLP REVISION PROPOSAL

Area	Proposal
<p><b>Better identifying &amp; classifying hazardous chemicals</b></p>	<p><b>Multi-constituent substances</b> to be treated as mixtures for classification if data on individual constituents is available. Except for ED, Persistent, Mobile, Bioaccumulative properties</p>
	<p><b>Bridging principles</b> &gt; Weight of evidence WoE with expert judgment to be justified.</p>
	<p><b>Deadline to update label</b> following classification changes. More severe classification: 6 months - Less severe classification: 18 months Harmonised classification: according to delegated act.</p>
	<p><b>Commission empowered</b> to initiate <b>harmonised classifications</b>. Grouping for harmonised classifications.</p>
	<p><b>C&amp;L inventory</b> to contain the reason for diverging classifications by notifiers. Identity of notifier made public.</p>
<p><b>Improving communication on chemical hazards</b></p>	<p><b>Fold-out labels</b> accepted more broadly, but introduction of <b>font size and formatting requirements</b></p>
	<p><b>Digital label concept</b>. Digital-only: limited to supplemental information. Delegated act to increment gradually the list of elements displayed online only.</p>
	<p><b>Labelling exemptions</b> for small packs: additional derogations depending on hazard classes criteria.</p>
<p><b>Addressing legal gaps and high levels of non-compliance</b></p>	<p>Establishment of supplier (<b>responsible actor</b>) in <b>EU</b>. Avoids consumer becoming an importer by default.</p>
	<p><b>Refill stations / sales</b>: list of requirements</p>
	<p><b>Online sales</b>: advertisement ≠ offer. Advertisement must contain hazard communication.</p>



# REVISION OF REACH

- Legislative proposal anticipated from European Commission in Q4 2023, but *may* come earlier (?) – pressure from Member States, NGOs and certain businesses
- Key elements for the detergents & cleaning products industry:
  - Reform of authorisation and restriction, including **Generic Approach to Risk Management (GRA)** = hazard-based restrictions on ‘most harmful substances’ in consumer products and for (some) professional uses (empowerment + work plan for implementing legislation)
  - **Essential use** concept as (sole?) basis to derogate from restrictions  
Study report pending containing proposed criteria
  - **Mixture Assessment Factor**: additional safety margin in Chemical Safety Assessments to take account of exposure to unintentional mixtures. Value of **5** recently indicated, for HPV chemicals
  - **Registration of polymers**: policy options for PRR identification, notification + registration process, grouping & information requirements
- A.I.S.E. is working with value chain partners and other formulating sectors to advocate for a workable, science-based approach to regulation that allows safe, effective products to remain on the market

# REVISION OF DETERGENTS REGULATION

October 2021

May 2022

Q1-Q2 2023

2023~

Roadmap

Public  
Consultation

Legislative proposal

European Parliament &  
Council of the EU



Adoption by the  
European Commission

Develop their positions



# REVISION OF DETERGENTS REGULATION

- Ingredient data sheet
- Alignment with New Legislative Framework
- Microbial cleaning products
- Refill sales
- Digital labelling





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15 March 2023

A.I.S.E. aisbl • Boulevard du Souverain 165 • 1160 Brussels • Belgium  
Phone: +32 2 679 62 60 • Email: [aise.main@aise.eu](mailto:aise.main@aise.eu)

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# THANK YOU !

[jan.robinson@aise.eu](mailto:jan.robinson@aise.eu)



A.I.S.E. aisbl • Boulevard du Souverain 165 • 1160 Brussels • Belgium  
Phone: +32 2 679 62 60 • Email: [aise.main@aise.eu](mailto:aise.main@aise.eu)

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