

The Consumer Voice in Europe

## EVALUATION OF THE DETERGENTS REGULATION (REGULATION(EC) No 648/2004)

Response to consultation



**Contact: Pelle Moos – [safety@beuc.eu](mailto:safety@beuc.eu)**

**BUREAU EUROPÉEN DES UNIONS DE CONSOMMATEURS AISBL | DER EUROPÄISCHE VERBRAUCHERVERBAND**  
Rue d'Arlon 80, B-1040 Brussels • Tel. +32 (0)2 743 15 90 • [www.twitter.com/beuc](http://www.twitter.com/beuc) • [consumers@beuc.eu](mailto:consumers@beuc.eu) • [www.beuc.eu](http://www.beuc.eu)  
EC register for interest representatives: identification number 9505781573-45



Co-funded by the European Union

Ref: BEUC-X-2017-080 - 12/07/2017

# Evaluation of the Detergents Regulation (Regulation (EC) No 648/2004) - Open Public Consultation - Organisations

Fields marked with \* are mandatory.

## Evaluation of the Detergents Regulation (Regulation (EC) No 648/2004) - Open Public Consultation

---

Detergents can contain surfactants so as to help them clean more efficiently. Unfortunately, surfactants may damage water quality when released into the environment. The Detergents Regulation (Reg. (EC) No 648/2004) establishes common rules to enable detergents and surfactants to be sold and used across the EU while also protecting the environment and human health. It does this by: harmonising testing methods to determine biodegradability; requiring manufacturers to provide information to relevant authorities and medical staff; requiring that information on packaging is legible, visible and indelible; requiring that labels provide information on recommended dosages; and enabling national authorities to ban a specific detergent should it pose risks to human health or the environment.

The Detergents Regulation has not undergone a full evaluation since its entry into force in October 2005. An ex post evaluation is therefore considered essential in the context of the European Commission's REFIT programme and Better Regulation Strategy. The purpose of this evaluation is to assess the extent to which the objectives of the Regulation have been achieved in terms of effectiveness, efficiency, relevance, coherence and EU-added value.

This survey forms a key component of the stakeholder consultation for the evaluation and its results will be analysed by the contractors to the European Commission.

If you have any questions, please do not hesitate to contact RPA or the Commission Project Manager:

- RPA Consultation Coordinator – Sophie Upson, tel: +44 207 492 1724, email: [sophie.upson@rpald.co.uk](mailto:sophie.upson@rpald.co.uk)
- DG Grow Project Manager – Paolo Sandri, tel: +32 229 61760, email: [paolo.sandri@ec.europa.eu](mailto:paolo.sandri@ec.europa.eu)

We thank you in advance for your cooperation.

### **Structure of this questionnaire**

This questionnaire contains the following sections:

- **Part 1:** About you
- **Part 2:** Effectiveness
- **Part 3:** Efficiency
- **Part 4:** Coherence
- **Part 5:** Relevance
- **Part 6:** Added value
- **Part 7:** Additional comments

### **Duration of the public consultation**

From 18.04.17 to 12.07.17

### **Target group(s)**

All citizens and organisations are welcome to contribute to this consultation.

### **How to submit your contribution**

It should take about 30 minutes to complete this questionnaire, depending on how detailed your answers are. If you experience any technical issues with the consultation questionnaire, please contact [EC-CENTRAL-HELPDESK@ec.europa.eu](mailto:EC-CENTRAL-HELPDESK@ec.europa.eu).

You are invited to regularly save your contribution (by clicking the button 'Save as draft' at the end of the questionnaire).

### **Privacy Statement**

*The collected personal data and all information related to the above-mentioned public consultation is stored on a computer of the external contractor, acting as processor, who must guarantee data protection and confidentiality as required by Regulation (EC) 45/2001.*

### **Disclaimer**

*This document does not represent an official position of the European Commission. It is a tool to explore the views of interested parties. The suggestions contained in this document do not prejudice the form or content of any future proposal by the European Commission.*

## Part 1: About you

---

1. Please enter the following details:

	Response
Contact name	Pelle Moos
Organisation	BEUC, The European Consumer Organisation
E-mail address	safety@beuc.eu
Telephone number	+32 2 743 15 90

\*2. Please specify which category best describes you or the organisation you represent:

- 1) An industry association
- 2) A business
- 3) A consumer association
- 4) A non-governmental organisation (NGO)
- 5) A trade union
- 6) A government or public authority
- 7) An intergovernmental organisation
- 8) Academia or a research or educational institute
- 9) Other

If other, please specify

4. Is your organisation registered in the EU Transparency Register? (If not, you can register [here](#), although you do not need to be registered to reply to this consultation)

- 1) Yes
- 2) No

If yes, please provide your ID number:

\*5. In which country are you based?

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovak Republic
- Slovenia
- Spain
- Sweden
- United Kingdom

If other (non-EU), please specify:

- \*6. Received contributions may be published on the Commission's website, with the identity of the contributor. Please state your preference with regard to the publication of your contribution.

*Please note that regardless of the option chosen, your contribution may be subject to a request for access to documents under Regulation 1049/2001 on public access to European Parliament, Council and Commission documents. In such cases, the request will be assessed against the conditions set out in the Regulation and in accordance with applicable data protection rules.*

- 1) **My contribution can be directly published with my personal information:** I consent the publication of all information in my contribution in whole or in part including my name, and I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent publication.
- 2) **My contribution can be directly published provided that I remain anonymous:** I consent to the publication of any information in my contribution in whole or in part (which may include quotes or opinions I express) provided that this is done anonymously. I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent the publication.
- 3) **My contribution cannot be directly published but may be included within statistical data:** I understand that my contribution will not be directly published, but that my anonymised responses may be included in published statistical data, for example, to show general trends in the response to this consultation.

## Part 2: Effectiveness

---

7. To what extent has the Detergents Regulation been effective in achieving the following objectives?

*\*The internal market of the European Union (EU) is a single market in which the goods, services, capital and persons can move freely across borders. One of the key objectives of the Detergents Regulation is to achieve the free movement of detergents and surfactants for detergents in the internal market.*

	1) Very effective	2) Somewhat effective	3) Neither effective nor ineffective	4) Somewhat ineffective	5) Very ineffective	6) Don't know / No opinion
Protecting human health	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Protecting the environment	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring a well-functioning internal market*	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Stimulating competitiveness and innovation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

If other, please specify:

9. To what extent do you agree that **consumer laundry detergent products** and **consumer automatic dishwasher detergent products** on the market today contain less phosphates and phosphorus containing compounds than they did in the past as a direct result of the Detergents Regulation and its amendments?

	1) Strongly agree	2) Agree	3) Neither agree nor disagree	4) Disagree	5) Strongly disagree	6) Don't know / No opinion
<u>Consumer laundry detergent products</u> contain less P than they did in the past as a <u>direct result</u> of the Detergents Regulation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Consumer automatic dishwasher detergent products</u> contain less P than they did in the past as a <u>direct result</u> of the Detergents Regulation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



11. Article 15 of the Detergents Regulation outlines the safeguard clause. It states that where a Member State has justifiable grounds for believing that a specific detergent, although complying with the requirements of the Detergents Regulation, constitutes a risk to the safety or health of humans or of animals or a risk to the environment, it may take all appropriate provisional measures, commensurate with the nature of the risk, in order to ensure that the detergent concerned no longer presents that risk, is withdrawn from the market or recalled within a reasonable period or its availability is otherwise restricted. To date, the safeguard clause has not been used.

Do you believe there is a role for the safeguard clause to be used in the future?

- 1) Yes
- 2) No
- 3) Don't know / No opinion

Please explain your answer:

The safeguard clause is an important principle in consumer product safety legislation that aims to keep consumers safe even if unforeseen situations arise in which the Member States need to be able to act quickly. As conditions and circumstances vary between different Member States, a detergent which gives rise to little or no concern in some Member States could nonetheless present an unacceptable risk in others. Article 15 thus serves as a key safeguard of consumer health should risks arise in future.

Another example where quick action may be needed concerns liquid detergent tabs: despite current EU legislation (Regulation EU No 1297/2014) children sadly continue to confuse liquid detergent tabs for candies or sweets, leading to frequent accidents as a result of ingestion.

12. To what extent do you agree that there is effective enforcement of the Detergents Regulation and its amendments by the responsible authorities in your country?

	1) Very effective	2) Somewhat effective	3) Neither effective nor ineffective	4) Somewhat ineffective	5) Very ineffective	6) Don't know / No opinion
Enforcement carried out by the responsible authorities is...	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

13. To what extent do you agree that existing sanctions for infringements of the Detergents Regulation are dissuasive, effective and proportionate?

	1) Strongly agree	2) Agree	3) Neither agree nor disagree	4) Disagree	5) Strongly disagree	6) Don't know / No opinion
Existing sanctions for infringements are <u>dissuasive</u>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Existing sanctions for infringements are <u>effective</u>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Existing sanctions for infringements are <u>proportionate</u>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

## Part 3: Efficiency

---

15. Are there any specific requirements in the Detergents Regulation that lead to particularly significant costs for you/your organisation? Please consider both monetary and non-monetary (e.g. administrative) costs.

- 1) Yes
- 2) No
- 3) Don't know

16. To what extent do you agree with the following statements regarding the benefits of the Detergents Regulation:

	1) Strongly agree	2) Agree	3) Neither agree nor disagree	4) Disagree	5) Strongly disagree	6) Don't know / No opinion
The Detergents Regulation has <u>improved the corporate image</u> of the sector	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The Detergents Regulation has <u>reduced the risk (and associated cost) of litigation</u> for the sector (e. g. due to a reduction in the number of allergic reactions, poisoning incidents)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The Detergents Regulation has <u>led to innovation</u> in the sector	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

<p>The Detergents Regulation has led to <u>market opportunities</u></p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<p>The Detergents Regulation has <u>levelled the playing field</u> for manufacturers of detergents and surfactants within the EU</p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>The Detergents Regulation has resulted in <u>benefits for other industry sectors</u> (e.g. tourism and commercial fisheries due to reduced phosphorous emissions to the aquatic environment)</p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

<p>The Detergents Regulation has helped to <u>protect the environment</u></p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>The Detergents Regulation has helped to <u>protect human health</u></p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>The Detergents Regulation has <u>reduced costs for the sector</u> (e.g. due to harmonised rules and facilitation of intra-EU trade)</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please provide details of any other benefits resulting from the implementation of the Detergents Regulation:

By protecting human health and environmental integrity, the Detergents Regulation has led to reduced public and private spending on health care services as well as on environmental remediation. These are clear benefits that could be further increased through more ambitious implementation of the core provisions of the Detergents Regulation.

17. To what extent do you agree with the following statements regarding the labelling/packaging requirements outlined in the Detergents Regulation:

	1) Strongly agree	2) Agree	3) Neither agree nor disagree	4) Disagree	5) Strongly disagree	6) Don't know / No opinion
The labelling requirements outlined in the Detergents Regulation are clear	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The packaging requirements outlined in the Detergents Regulation are clear	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



<p>The labelling requirements outlined in the Detergents Regulation are sufficient to inform <u>downstream users</u> about the <u>ingredients and instructions</u> regarding detergent use</p>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>The labelling requirements outlined in the Detergents Regulation are sufficient to inform <u>consumers</u> about the <u>ingredients and instructions</u> regarding detergent use</p>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

<p>The labelling requirements outlined in the Detergents Regulation are sufficient to inform <u>downstream users</u> about <u>potential allergenic substances</u> in detergents</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>The labelling requirements outlined in the Detergents Regulation are sufficient to inform <u>consumers</u> about <u>potential allergenic substances</u> in detergents</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

18. To what extent do you agree that the costs involved in implementing the Detergents Regulation are justified given the benefits that have been achieved, or that may be achieved in the longer-term?







	1) Strongly agree	2) Agree	3) Neither agree nor disagree	4) Disagree	5) Strongly disagree	6) Don't know / No opinion
The costs involved in implementing the Detergents Regulation are justified given the benefits <u>that have already been achieved</u>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The costs involved in implementing the Detergents Regulation are justified given the benefits <u>that will be achieved in the longer-term</u>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

## Part 4: Coherence

---

19. To what extent do you agree with the following statements relating to the functioning of the Detergents Regulation:

	1) Strongly agree	2) Agree	3) Neither agree nor disagree	4) Disagree	5) Strongly disagree	6) Don't know / No opinion
There are gaps, overlaps and inconsistencies /contradictions <u>within the provisions of the Detergents Regulation</u>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
There are overlaps and inconsistencies /contradictions <u>between the Detergents Regulation and other pieces of EU legislation</u>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

<p>There are overlaps and inconsistencies /contradictions between the Detergents Regulation and <u>national legislation</u></p>						
---	---	---	---	---	---	---

20. Please indicate any gaps, overlaps, inconsistencies etc. identified within the provisions of the Detergents Regulation and/or between the Detergents Regulation and other legislation (EU and/or national). Where you have indicated specific gaps, overlaps and/or inconsistencies, please explain what impacts have arisen as a result.

	1) Within the provisions of the Detergents Regulation	2) Between the Detergents Regulation and other legislation
Gaps		Detergents should carry a full ingredient lists similar to cosmetic products. Many uses and exposures are similar. There is an urgent need to update and elaborate the current list of 26 consumer allergens. More perfumes are allergenic, and should be covered by similar requirements. REACH continues the semi-automatic ban on sale to consumers of mixtures containing CMRs. However, unlike article 15 of the cosmetics regulation, this ban only covers substances classified as CMR category 1A and 1B. A mechanism to restrict use in detergents of substances classified as CMR category 2 is needed to close this gap and to ensure coherence with e.g. the cosmetics regulation. Further, use in detergents of substances meeting the criteria in REACH article 57 (substances of very high concern), including those with endocrine disrupting properties, should not be allowed.
Overlaps		
Inconsistencies/contradictions		The Cosmetics Regulation restricts use of certain isothiazolinones (e.g. methylisothiazolinone). Similar restrictions are absent in the Detergents Regulation, even though the potential for skin contact for some detergents, such as hand dishwashing detergents, can be comparable to rinse-off cosmetics. This is a clear inconsistency that needs to be addressed.

## Part 5: Relevance

---



21. To what extent do you agree with the following statements:

	1) Strongly agree	2) Agree	3) Neither agree nor disagree	4) Disagree	5) Strongly disagree	6) Don't know / No opinion
The concepts and definitions used in the Detergents Regulation (particularly those in Article 2) are in line and coherent with the meaning they have gained over time in practice	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The scope of the Detergents Regulation covers all commonly accepted detergent products available on the market	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you responded 'disagree' or 'strongly disagree' to the previous question, please provide examples:

	Response
Examples of where there are inconsistencies between the concepts and definitions used in the Detergents Regulation and associated meanings gained over time in practice	
Examples of products available on the market (or that may be placed on the market in the coming years) that are not currently within the scope of the Detergents Regulation	

22. To what extent do you agree that the objectives of the Detergents Regulation are still relevant considering the evolution of societal needs and technological developments:

	1) Strongly agree	2) Agree	3) Neither agree nor disagree	4) Disagree	5) Strongly disagree	6) Don't know / No opinion
The objectives of the Detergents Regulation are still relevant considering the evolution of societal needs and technological developments	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Could you please provide examples of where the Detergents Regulation has adapted well/not so well to changing societal needs and technological developments:

	Response
Examples of where the Detergents Regulation has <u>adapted well</u> to changing societal needs and technological developments	
Examples of where the Detergents Regulation has <u>not adapted so well</u> to changing societal needs and technological developments	

23. Are you aware of any new problems/issues related to detergents, their use and their impacts on the environment and human health that are not currently addressed through the Detergents Regulation?

- 1) Yes
- 2) No
- 3) Don't know

Please provide examples:

The Detergents Regulation only contains rules concerning the chemical composition of the product. However, due to the fact that consumers use more and more often single portion liquid washing tabs, serious accidents occur with children biting on the tabs because they confuse them with sweets. Even though the EU has put strict safety rules in place under the CLP Regulation (EU Regulation No 1297/2014) which foresee opaque outer packaging (the box) and adding a bitter agent to the plastic of the capsules, accidents seem to continue. More improvements are urgently needed such as also packaging the single capsules in opaque packaging rather than letting them continue to look like sweets.

In addition, there is a need for rules to address the use of e.g. microplastics and nanosilver as well as washing eggs/balls. The Commission also need to ensure that the Detergents Regulation is fit-for-purpose with regard to the circular economy (i.e. refill of bottles)

## Part 6: Added Value

24. To what extent do you agree that the Detergents Regulation has made it easier to trade detergents and surfactants cross-border within the EU:

	1) Strongly agree	2) Agree	3) Neither agree nor disagree	4) Disagree	5) Strongly disagree	6) Don't know / No opinion
The Detergents Regulation has made it easier to trade detergents and surfactants cross-border within the EU	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

25. To what extent has the Detergents Regulation added value above what could have been achieved through action at a national level (e.g. better outcomes for the environment and human health and in relation to levelling the playing field, innovation and competitiveness)?

- 1) The Detergents Regulation has provided significant added value
- 2) The Detergents Regulation has provided some added value
- 3) The Detergents Regulation has not provided any added value
- 4) Don't know / No opinion

Please provide examples of achievements of the Detergents Regulation that could not have been reached at the Member State level alone:

26. To what extent do you agree that the issues addressed by the Detergents Regulation continue to require action at the EU level:

	1) Strongly agree	2) Agree	3) Neither agree nor disagree	4) Disagree	5) Strongly disagree	6) Don't know / No opinion
The issues addressed by the Detergents Regulation continue to require action at the EU level	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you have a mixed view and consider that some issues addressed by the Detergents Regulation continue to require action at the EU level whereas other issues do not continue to require action at the EU level, please provide examples below:

	Response
Examples of issues addressed by the Detergents Regulation that <u>continue to require</u> action at the EU level	
Examples of issues addressed by the Detergents Regulation that <u>do not continue to require</u> action at the EU level	

## Part 7: Additional comments

---

### 27. If you have any additional comments you would like to make, please insert them here:

The 2004 Detergents Regulation improved protection of human health and environmental integrity. Nonetheless, room for further improvement certainly exists. We recommend that the following changes be introduced to improve the level of protection as well as to enable informed consumer choice.

- Although the Detergents Regulation establishes an obligation to declare certain ingredients, this obligation should be extended to include a full ingredient list similar to similar to cosmetic products.
- Use of substances listed as contact allergens in humans in the opinion on fragrances of the Scientific Committee on Consumer Safety (June 2012) should be restricted. Where such substances are present clear labels to inform the consumer should be required.
- Isothiazolinones need to be limited, at least at the same level as set in the Cosmetics Regulations, for detergents with a similar skin contact potential as rinse-off cosmetics, e.g. like hand dishwashing detergents.
- Preservatives and coloring agents that meet the CLP criteria for classification as hazardous for the environment and health should be avoided /strictly limited.
- A generic ban on ingredients identified as SVHC under REACH should be introduced (the Danish Counsumer Council has for example demonstrated use of Sodium Borate in detergents: <http://kemi.taenk.dk/bliv-groennere/test-examines-chemicals-laundry-detergents-colored-clothes>)
- Use of microplastics in all detergents should be phased out without delay.
- The labelling regarding surfactants is incomprehensible - and should be replaced with a biodegradability scale/a timeline for how long it takes to biodegrade the product, or similar.
- Using the right amount of laundry detergent seems to be a challenge for consumers. The regulation should focus on making correct dosing more easy.

Drawing on the experience of the EU Ecolabel, we further recommend that new provisions are introduced in the Detergents Regulation to ensure that

- Surfactants should be biodegradable under both aerobic and anaerobic conditions. Whereas the EU Ecolabel and Nordic Swan requires that detergent ingredients must be biodegradable under aerobic conditions, anaerobic



biodegradability is only required for surfactants that are hazardous to the environment.

- Requirements for biodegradability should also be included for organic compounds (beyond surfactants).

- Phosphates should be banned and phosphorus should be further limited in detergents (at least in some categories there is evidence from Ecolabelling that this is possible).

## Contact

[pete.floyd@rpaltd.co.uk](mailto:pete.floyd@rpaltd.co.uk)

---



*This publication is part of an activity which has received funding under an operating grant from the European Union's Consumer Programme (2014-2020).*

*The content of this publication represents the views of the author only and it is his/her sole responsibility; it cannot be considered to reflect the views of the European Commission and/or the Consumers, Health, Agriculture and Food Executive Agency or any other body of the European Union. The European Commission and the Agency do not accept any responsibility for use that may be made of the information it contains.*