
Von: Kattanek, Ralf
Gesendet: Dienstag, 6. August 2024 15:49
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Cc: Uhlein, Mareike (Dr.)
Betreff: CESIO Kernbotschaften zur Revision der Detergenzien- Verordnung
Anlagen: 240710-CESIO detergents - key concerns-F.pptx; 240805-Comparaison
COM_EP_Council_Comments-preliminary recommendations-F.xlsx; CESIO
Detergenzien-Verordnung Schlüsselbotschaften.pdf

Sehr geehrte Frau Dr. Lindemann,

im Namen des Verbands TEGEWA möchten wir Ihnen die Position des europäischen Tensidhersteller Verbands CESIO zur Überarbeitung der Detergenzien-Verordnung vorstellen. TEGEWA ist ein deutscher Fachverband, der die chemische Industrie der Prozess- und Performance-Chemikalienhersteller vertritt und unter anderem auch die Tensidhersteller einschließt.

Am 11. Juli trat die Ratsarbeitsgruppe für technische Harmonisierung (Gefährliche Stoffe - Chemikalien) zusammen, um mit der Analyse des Standpunkts des Europäischen Parlaments zum Vorschlag für eine Verordnung über Detergenzien und grenzflächenaktive Substanzen zu beginnen und die wichtigsten Unterschiede zwischen dem Standpunkt des EP und dem Mandat des Rates zu ermitteln. Die Mitgliedstaaten wurden von der ungarischen Ratspräsidentschaft aufgefordert, bis zum 7. August schriftlich zu den wichtigsten Unterschieden zwischen den beiden Standpunkten Stellung zu nehmen, und zwar zu einer Reihe von Themen, darunter Phosphorgehalt, Datenblatt über Inhaltsstoffe, Anforderungen an die biologische Abbaubarkeit, Mikroorganismen, Tierversuche, Verpflichtungen der Hersteller und Bevollmächtigten, Kennzeichnungsvorschriften, digitaler Produktpass und Sanktionen.

Die CESIO hat ausgewählte Themen bei einem Treffen mit dem ungarischen Ratsvorsitz am 10. Juli angesprochen (Folien im Anhang), und wir möchten nun die folgenden (und beigefügten) Schlüsselbotschaften an die Mitgliedstaaten weitergeben.

Wir hoffen, dass unsere sachliche Darlegung die Perspektive der Industrie verdeutlichen kann und Ihnen wertvolle Informationen für weitere Diskussionen bietet.
Bei offenen Fragen stehen wir Ihnen sehr gerne zur Verfügung.

Mit freundlichen Grüßen

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Die CESIO hat ausgewählte Themen bei einem Treffen mit dem ungarischen Ratsvorsitz am 10. Juli angesprochen (Folien im Anhang), und wir möchten nun die folgenden (und beigefügten) Schlüsselbotschaften an die Mitgliedstaaten weitergeben, vorzugsweise noch vor Ablauf der Frist für schriftliche Kommentare am 7. August:

1. Durch die Überarbeitung der Detergenzien Verordnung wird die Rolle der Tenside tendenziell unklar:

- Tenside sind (in dieser Verordnung unter Artikel 2) eindeutig als Bestandteile von Detergenzien definiert (Artikel 2) → daher verwirrt die Formulierung "Tenside und Tenside in Detergenzien" und sollte sich auf "Tenside in Detergenzien" konzentrieren → **Empfehlung: den Anwendungsbereich in Erwägungsgrund 1 zu präzisieren**
- Tenside sind chemische Rohstoffe, die in B2B-Geschäften verwendet werden und nicht für die eigenständige Verwendung durch den Verbraucher bestimmt sind → **der Grad der Regulierung sollte die Verwendung als Rohstoff und nicht als Endprodukt widerspiegeln (Kennzeichnungsanforderungen, technische Dokumentation usw.)**. Tenside sind im Rahmen von EU REACH und EU CLP bereits vollumfänglich geregelt. Daher sollten die im Vorschlag geforderten zusätzlichen Informationen über "Tenside" entweder gestrichen oder auf "Tenside, die in direkt an Verbraucher verkauften Detergenzien verwendet werden" beschränkt werden, um unnötigen Verwaltungsaufwand zu vermeiden. Dies würde dem Sinn von Erwägungsgrund 7 aller drei Vorschläge entsprechen.

2. Die Anforderungen an die biologische Abbaubarkeit von Tensiden entsprechen nicht dem neuesten Stand der Wissenschaft und bergen die Gefahr der Ineffizienz:

- Anforderungen an die biologische Abbaubarkeit und Informationspflichten für in Detergenzien verwendete Tenside bestehen bereits seit Inkrafttreten der bestehenden Verordnung EU 648/2004 → **Tenside erfüllen bereits ein hohes Maß an Standards**

- Der Ratstext bietet die Möglichkeit, die Prüfmethoden für Tenside zu ändern (Artikel 26.6 a). → Die Referenzprüfmethoden für die Marktüberwachung sollten überarbeitet werden, um dem neuesten Stand der Wissenschaft zu entsprechen (Artikel 22, Anhang I und VII). Da die Wahl der Methode von den physikalischen Eigenschaften des Produkts abhängt und unter den in Anhang I.3 aufgeführten Methoden gewählt werden kann, **besteht kein Bedarf an einer spezifischen Referenzmethode.**
- Es ist wichtig, den ursprünglichen Erwägungsgrund 30 der geltenden Detergenzien Verordnung (EG) Nr. 648/2004 wieder aufzunehmen, der es ermöglicht, auf zusätzliche Prüfungen der biologischen Abbaubarkeit von Tensiden zu verzichten, wenn zuverlässige und wissenschaftlich fundierte Studien vorliegen → **um damit unnötige Wiederholung von Prüfungen zu vermeiden**

3. Bedenken hinsichtlich der Definition von Tensiden:

- Wir betonen, wie wichtig eine Angleichung der Definition an die EU-Zolltarifverordnung ist.
- Die derzeit von der Kommission vorgeschlagene Definition ist technisch schwierig anzuwenden.
- Die CESIO hat eine spezielle Arbeitsgruppe, die sich mit den Prüfmethoden für Tenside befasst und nun einen Leitfaden für Prüfmethoden zur Bestimmung von Tensiden ausarbeiten wird.

4. Kennzeichnung

- Tenside sind Bestandteile von Detergenzien, die hauptsächlich an Formulierer verkauft werden, denen die Art der Tenside, die sie kaufen, aufgrund der vorhandenen technischen Unterlagen bekannt ist (anionisch, nichtionisch usw.). Eine zusätzliche Kennzeichnung gemäß Anhang V.1 (c bis f) würde keinen zusätzlichen Nutzen bringen → **Empfehlung: sollte gestrichen oder zumindest auf Tenside beschränkt werden, die an Endverbraucher verkauft werden**

5. Digitaler Produktpass

- Da Tenside für andere Zwecke als Detergenzien verwendet werden können und bereits als "Chemikalien" geregelt sind, sollten die Anforderungen durch horizontale Rechtsvorschriften festgelegt werden. Der digitale Produktpass für die Produktkategorien Detergenzien und Chemikalien wird durch die ESPR eingeführt → **Vermeidung von Doppelarbeit bei den Rechtsvorschriften**

Revision of the EU Detergents Regulation: CESIO comments on current proposals

10 July 2024



1

Background: surfactants used in detergents

- **Surfactants** used in detergents **already comply with a high level of standards**
- Whilst we welcome any targeted improvements and technical developments, especially where efficiencies can be found, we also highlight that the **Detergents Regulation was found to be generally fit for purpose** following the ex-post review in 2019
- CESIO participated in several consultations before publication of the Commission proposal, and at no point before publication of the new proposal in 2023 was there any extensive discussion about further extending requirements or the scope for surfactants, and **no impact assessment** on any such changes has been conducted

2

Proposal for a regulation on detergents and surfactants ?

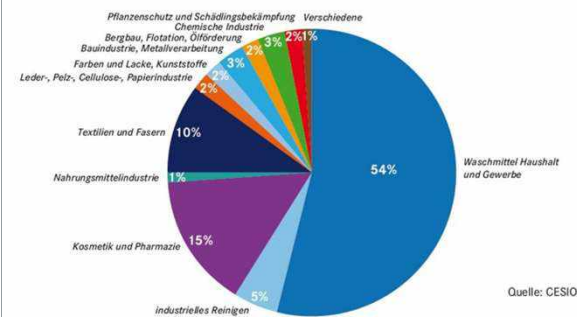


Surfactants:

- Are mainly sold as raw materials/ ingredients: B2B in detergents
- Contain one or few components well described in the Safety Data Sheets (SDS)

Anwendungsgebiete von Tensiden

Übersicht: Verwendung von Tensiden in Westeuropa
(Anteil am Gesamtverbrauch in %, Anteile über die letzten Jahre konstant)



→ Why regulate surfactants on the same level as detergents?

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Internal

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3

The revision of the Detergents Regulation tends to confuse the role of surfactants



- Surfactants are clearly defined as ingredients of detergents (Article 2) → the wording “surfactants and surfactants in detergents” confuses this definition and **should focus on “surfactants in detergents”**
- Surfactants are raw material chemicals used in B2B transactions that are typically not intended for standalone consumer use → **level of regulation should reflect raw material vs. end product use (label requirements, technical documentation, etc..)**
- Surfactants are already well regulated within EU REACH and EU CLP. Consequently, additional information on “surfactants” requested by **the proposal should be limited to “surfactants used in detergents sold directly to consumers”** → avoid unnecessary administrative burden
- Digital product passport for the product categories detergents & chemicals will be introduced by the EPR → **avoid duplication of legislation**

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Internal

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4

Biodegradability requirements for surfactants miss latest science and are risk for inefficiencies

- Biodegradability and information requirements have already existed for surfactants used in detergents since entry into force of the existing Regulation EU 648/2004 → **Surfactants already comply with a high level of standards**
- Reference testing methods for market surveillance should be reviewed to reflect the latest science (article 22, Annex I and VII): the choice of the method depends on the physical properties of the product → **no need for specific reference method**
- It is essential to reinstall paragraph 30 of the current detergent regulation EC 648/2004, which allows to waive additional biodegradability tests on surfactants when previous reliable and scientifically robust studies are available → **avoid the unnecessary duplication of tests**

5

Concern on the definition of surfactant

- We highlight the importance of an alignment of the definition with the EU Customs Tariff
- The current definition proposed by the Commission is technically difficult to apply
- CESIO has a specific task force (TMS) devoted to testing methods of surfactants.
 - We want to ensure that the right methods and procedures can be defined which are scientifically sound
 - CESIO TMS will now develop a guidance on testing methods for determining surfactants, which should be available in October of 2024.
- CESIO remains available to answer any technical questions through our experts if needed.

6


SURFACTANTS EUROPE

Thank you!


A sector group of Cefic

Internal

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| Council proposal | Commission proposal | Parliament amendments | CSIO choice/rephrasing | CSIO comments |
|---|---|--|---|---|
| REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on detergents and surfactants, and repealing Regulation (EC) No 648/2004 | REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on detergents and surfactants, amending Regulation (EU) 2019/1020 and repealing Regulation (EC) No 648/2004. | REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on detergents and surfactants, amending Regulation (EU) 2019/1020 and repealing Regulation (EC) No 648/2004. | | |
| Recital number | | | | |
| 1 | The conditions for placing and making available on the market of detergents and surfactants for detergents have been harmonised through Regulation (EC) No 648/2004 of the European Parliament and of the Council. <u>The harmonised requirements of that Regulation are related to the particular conditions of use and the disposal of detergents with wastewater, including:</u> | The conditions for placing and making available on the market of detergents and surfactants for detergents have been harmonised through Regulation (EC) No 648/2004 of the European Parliament and of the Council. | The conditions for placing and making available on the market of detergents and surfactants for detergents have been harmonised through Regulation (EC) No 648/2004 of the European Parliament and of the Council. <u>Surfactants in the scope of Regulation are only those intended to be used in detergents.</u> | Surfactants are clearly defined (in this regulation under Article 2) as ingredients of detergents (Article 2) therefore the wording "surfactants and surfactants in detergents" confuses this definition and should focus on "surfactants in detergents" I propose to clarify the scope under recital 1 |
| Article number | | | | |
| Article 2 (11) | 'surfactant' means any organic substance or mixture used in detergents, which has surface-active properties and which consists of one or more hydrophilic and one or more hydrophobic groups of such a nature and size that it is capable to perform all of the following actions: <ul style="list-style-type: none">-to reduce the surface tension of water below 45 mN/m;-to form spreading or adsorption monolayers at the water-air interface;-to form emulsions and/or microemulsions and/or micelles;-to adsorb at water-solid interfaces; | 'surfactant' means any organic substance or mixture used in detergents, which has surface-active properties and which consists of one or more hydrophilic and one or more hydrophobic groups of such a nature and size that it is capable to perform all of the following actions: <ul style="list-style-type: none">-to reduce the surface tension of water below 45 mN/m;-to form spreading or adsorption monolayers at the water-air interface;-to form emulsions and/or microemulsions and/or micelles;-to adsorb at water-solid interfaces; | CSIO suggests using the following definition which is more clear: Surfactant means any surface-active organic substance or mixture which consists of one or more hydrophilic and one or more hydrophobic groups of such a nature and size that it is capable of fulfilling both of the following criteria: <ul style="list-style-type: none">• forms a clear micellar solution or a translucent microemulsion or stable emulsion without separation of insoluble matter when mixed with water at a concentration of 0.5 w/v and left to stand for one hour at 20°C• reduces the surface tension of water to <45 mN/m (at a concentration of 0.5 w/v at 20°C). | We highlight the importance of an alignment of the definition with the EU Customs Tariff. • The current definition proposed by the Commission is technically difficult to apply. • CSIO has a specific task force devoted to testing methods of surfactants, which will now develop a guidance on testing methods for determining surfactants. See proposed definition under column E. Also, as previously noted, surfactants in the scope of Regulation must be intended as surfactants for detergents. |
| Article 7 (6) | Manufacturers placing on the market detergents or surfactants for which there is no obligation to provide information in accordance with Article 46 of Regulation (EC) No 1272/2008, shall provide to Member States' appointed bodies referred to in that Article, the ingredient data sheet referred to in point 2.2 (c) of Annex IV in the following cases: (a) upon request from the Member States' appointed bodies; (b) when the detergent or surfactant for which an ingredient data sheet has already been requested no longer corresponds to the information included in that data sheet. This is without prejudice to the right of a Member State to request that such a data sheet be made available to an appointed body to which the Member State has assigned the task of providing this information to medical personnel. The ingredient data sheet shall be transmitted using the format and submission tool determined by the appointed bodies requesting it. | Manufacturers placing on the market detergents that do not meet the criteria for classification as hazardous within the meaning of Regulation (EC) No 1272/2008, shall provide to Member States' appointed bodies referred to in Article 45 of that Regulation, the ingredient data sheet referred to in point 2.2 (c) of Annex IV. Manufacturers shall provide the ingredient data sheet to the Member States' appointed bodies referred to in the first subparagraph in the following cases: (a) upon request from the Member States' appointed bodies; (b) when the detergent for which a data sheet has already been requested no longer corresponds to the information included in that datasheet. The appointed body referred to in the first subparagraph and the medical personnel to which the information contained in the datasheet has been provided shall keep it confidential and use it for medical purposes only. | (a) the time of placing a detergent on the market; (b) when the detergent for which a data sheet has already been provided no longer corresponds to the information included in that datasheet. | Support Commission proposal. This article should be valid only for detergents. Surfactants are B2B chemicals already well regulated by REACH and CLP. |
| Article 15 (1) | Detergents and surfactants that are made available on the market in individual packaging or in a refill format shall be accompanied by a label. | Detergents and surfactants that are made available on the market in individual packaging or in a refill format shall be accompanied by a label. | Detergents and surfactants that are made available on the market in individual packaging or in a refill format shall be accompanied by a label. | Proposal is to deleted surfactants as follows: "Detergents and surfactants that are made available on the market in individual packaging or in a refill format shall be accompanied by a label." Alternatively, if surfactants is not deleted, then the wording should be changed to "Surfactants sold to end consumers or in refill format" |
| Article 22 (1) | Where the market surveillance authorities of one Member State have sufficient reason to believe that a detergent or surfactant presents a risk to health or the environment, they shall carry out an evaluation in relation to the detergent or surfactant concerned covering all relevant requirements laid down in this Regulation. The relevant economic operators shall cooperate as necessary with the market surveillance authorities for that purpose. | Where the market surveillance authorities of one Member State have sufficient reason to believe that a detergent or surfactant presents a risk to health or the environment, they shall carry out an evaluation in relation to the detergent or surfactant concerned covering all relevant requirements laid down in this Regulation. The relevant economic operators shall cooperate as necessary with the market surveillance authorities for that purpose. | Where the market surveillance authorities of one Member State have sufficient reason to believe that a detergent or surfactant presents a risk to health, safety or the environment, they shall carry out an evaluation in relation to the detergent or surfactant concerned covering all relevant requirements laid down in this Regulation. The relevant economic operators shall cooperate as necessary with the market surveillance authorities for that purpose. | We support Council proposal for this paragraph. |
| Article 22 (2) | Where the market surveillance authorities of one Member State have sufficient reason to believe that a test carried out in accordance with the methods listed in Annex I or Annex II has produced false results, they shall perform controls to verify the compliance of the detergent or surfactant with this Regulation in accordance with the reference methods set out in this Regulation. Economic operators shall not be obliged to pay for any repeat or additional test, provided that the initial test has shown compliance of detergents or surfactants with this Regulation. | Where the market surveillance authorities of one Member State have sufficient reason to believe that a test carried out in accordance with the methods listed in Annex I or Annex II has produced false results, they shall perform controls to verify the compliance of the detergent or surfactant with this Regulation in accordance with the reference methods set out in Annexes I, II and VI. Economic operators shall not be obliged to pay for any repeat or additional test, provided that the initial test has shown compliance of detergents, or surfactants, with this Regulation. | Where the market surveillance authorities of one Member State have sufficient reason to believe that a test carried out in accordance with the methods listed in Annex I or Annex II has produced false results, they shall perform controls to verify the compliance of the detergent or surfactant with this Regulation in accordance with the reference methods set out in Annexes I, II and VI. Economic operators shall not be obliged to pay for any repeat or additional test, provided that the initial test has shown compliance of detergents, or surfactants, with this Regulation. | Support combination of Council and Commission proposals as follows, with removal of the word reference: Market surveillance authorities may perform controls to verify the compliance of the detergent or surfactant with this Regulation in accordance with the reference methods set out in the Annexes. Economic operators shall not be obliged to pay for any repeat or additional test, provided that the initial test has shown compliance of detergents, or surfactants, with this Regulation. Economic operators shall not be obliged to pay for any repeat or additional test, provided that the initial test has shown compliance |
| Article 26 (6) | The Commission is empowered to adopt delegated acts in accordance with Article 27 amending Annex I, and, where appropriate, Article 4 so as to: a) amend the biodegradability requirements and corresponding test methods for surfactants or surfactants contained in detergents; b) add or amend biodegradability requirements and corresponding test methods for other detergent ingredients, including polymers used to encapsulated detergents; c) add or amend exceptions authorising the limited use in detergents of specific substances that do not comply with the biodegradability requirements laid down by Annex I, when duly justified. The purpose of the delegated acts in the first subparagraph shall be to ensure a high level of protection of health and the environment. When adopting such delegated acts, the Commission shall take into account, alongside the impact on human health and the environment, the following factors: current manufacturing practices, the consequences for wastewater treatment plants, the availability of technically and economically feasible alternatives and impacts on small and medium-sized enterprises. | Where new scientific evidence points to the need to introduce biodegradability requirements for substances and mixtures other than surfactants in detergents, including detergent capsules, the Commission is empowered to adopt delegated acts in accordance with Article 27 amending Annex I to lay down biodegradability criteria for those substances and mixtures and test methods to verify compliance with them. When adopting delegated acts in accordance with the first subparagraph, the Commission shall take into account the current manufacturing practices, the availability of technically and economically feasible alternatives and the impacts to small and medium-sized enterprises. | Where new scientific evidence points to the need to introduce biodegradability requirements for substances and mixtures other than surfactants in detergents, including detergent capsules, the Commission is empowered to adopt delegated acts in accordance with Article 27 amending Annex I to lay down biodegradability criteria for those substances and mixtures and test methods to verify compliance with them. When adopting delegated acts in accordance with the first subparagraph, the Commission shall take into account the current manufacturing practices, the availability of technically and economically feasible alternatives and the impacts to small and medium-sized enterprises. | We support the Council text with a small modification as follows to clarify scope and to refer to annex VI: "The Commission is empowered to adopt delegated acts in accordance with Article 27 amending Annex I, (b) and, where appropriate, Article 4 so as to: a) amend the biodegradability requirements and corresponding test methods for surfactants and surfactants contained in detergents ; b) add or amend biodegradability requirements and corresponding test methods for other detergent ingredients, including polymers used to encapsulated detergents; c) add or amend exceptions authorising the limited use in detergents of specific substances that do not comply with the biodegradability requirements laid down by Annex I, when duly justified. The purpose of the delegated acts in the first subparagraph shall be to ensure a high level of protection of health and the environment. When adopting such delegated acts, the Commission shall take into account, alongside the impact on human health and the environment, the following factors: current manufacturing practices, the consequences for wastewater treatment plants, the availability of technically and economically feasible alternatives and impacts on small and medium-sized enterprises." |
| Annex number | | | | |
| Annex I (title) | ULTIMATE BIODEGRADABILITY CRITERIA AND TEST METHODS FOR DETERGENTS AND OTHER ORGANIC INGREDIENTS OF DETERGENTS | ULTIMATE BIODEGRADABILITY CRITERIA AND TEST METHODS FOR SURFACTANTS AND SURFACTANTS IN DETERGENTS | ULTIMATE BIODEGRADABILITY CRITERIA AND TEST METHODS FOR DETERGENTS AND SURFACTANTS IN DETERGENTS | |
| Annex I A (1) | The reference method for laboratory testing of surfactant ultimate biodegradability in this Regulation is based on the EN ISO standard 14593: 1999 (CO ₂ headspace test). | The reference method for laboratory testing of surfactant ultimate biodegradability in this Regulation is based on the EN ISO standard 14593: 1999 (CO ₂ headspace test). | The reference method for laboratory testing of surfactant ultimate biodegradability in this Regulation is based on the EN ISO standard 14593: 1999 (CO ₂ headspace test). | Surfactants are clearly defined (in this regulation under Article 2) as ingredients of detergents (Article 2) –therefore the wording "surfactants and surfactants in detergents" confuses this definition and should focus on "surfactants in detergents". We propose to clarify the scope under recital 1 (see earlier comments). The council text offers the opportunity to amend the testing methods for surfactants (Article 26.6.A). Reference testing methods for market surveillance should be reviewed to reflect the latest science (article 22, Annex I and VII) -> Since the choice of the method depends on the physical properties of the product and can be chosen among the method listed under Annex I.3, there is no need for a specific reference method. Also, as mentioned previously, scope must be limited for surfactants to their use in detergents. We propose to support the text of the council with "may perform" rather than "shall" and add the part on no obligation to pay for additional tests |
| Annex I A (4) | The tests referred to in point 3 shall be conducted by laboratories meeting any of the following conditions: (a) the laboratories are complying with the principles of good laboratory practice provided for in Directive 2004/18/EC of the European Parliament and of the Council or international standards recognised as being equivalent; (b) the laboratories are accredited in accordance with the standard for laboratories referred to in Regulation (EC) No 765/2008. | The tests referred to in point 3 shall be conducted by laboratories meeting any of the following conditions: (a) the laboratories are complying with the principles of good laboratory practice provided for in Directive 2004/18/EC of the European Parliament and of the Council or international standards recognised as being equivalent; (b) the laboratories are accredited in accordance with the standard for laboratories referred to in Regulation (EC) No 765/2008. | The tests referred to in point 3 shall be conducted by laboratories meeting any of the following conditions: (a) the laboratories are complying with the principles of good laboratory practice provided for in Directive 2004/18/EC of the European Parliament and of the Council or international standards recognised as being equivalent; (b) the laboratories are accredited in accordance with the standard for laboratories referred to in Regulation (EC) No 765/2008. | The current detergent regulation EC 648/2004 in paragraph 30 provides the possibility not to perform additional biodegradability tests on surfactants when previous reliable and scientifically robust studies are available. This derogation, which has been removed from the Commission proposal must be maintained. It should clearly be made possible to use tests or to use CSIO data, literature data and Ecobud DID list data that has been assessed as reliable. This would help to avoid the unnecessary duplication of tests without any benefit. We also suggest to restate recital 30 from the existing Detergents Regulation (EC) No 648/2004/48 as follows into a new recital: "The tests specified for the biodegradability of surfactants should be carried out in laboratories meeting an internationally recognised standard, namely EN/ISO/IEC/17025 or the principles of good laboratory practice; it would not be justified to ask for the application of this latter requirement to existing surfactants to the extent that the available tests on them had been performed before the entry into force of the above standard and still provide a comparable level of scientific quality". As surfactants can be used for different purposes other than detergents and are already regulated as "chemicals", the requirements should be fixed by horizontal legislation: Digital product passport for the product categories detergents & chemicals will be introduced by the ESPR – avoid duplication of legislation |
| Annex VI | The digital product passport shall include the following information: (a) the unique product identifier of the detergent or surfactant; (b) the name, the address of the manufacturer, and, when applicable, of the importer or the manufacturer's authorised representative, as well as the manufacturer's unique operator identifier; (c) the identification of detergent or surfactant allowing traceability, including its trade name and a colour image of the packaging of the detergent or surfactant of sufficient clarity to enable the identification of the detergent or surfactant; (d) the commodity code, as defined in Council Regulation (EEC) No 2658/82 under which the detergent or surfactant is classified at the moment the digital product passport is created or set out in Council Regulation (EC) No 2658/82; (e) a statement that compliance of the detergent or surfactant with the requirements set out in this Regulation has been demonstrated, and, where relevant, references to other Union legislation with which the detergent or surfactant complies or conforms. | PRODUCT PASSPORT The product passport shall include the following information: (a) the unique product identifier of the detergent or surfactant; (b) the name, the address of the manufacturer or the manufacturer's authorised representative as well as the manufacturer's unique operator identifier; (c) the identification of detergent or surfactant allowing traceability, including a colour image of sufficient clarity to enable the identification of the detergent or surfactant; (d) the commodity code under which the detergent or surfactant is classified at the moment the product passport is created, as set out in Council Regulation (EEC) No 2658/82; (e) references to Union legal acts that the detergent or surfactant complies with; | (b) the name, the postal and email address of the manufacturer or the manufacturer's authorised representative as well as the manufacturer's unique operator identifier; (f) a full list of substances intentionally added in the detergent or surfactant and of preservatives, using the International Nomenclature of Cosmetic Ingredients, or where it is not available, the common chemical name or International Union of Pure and Applied Chemists name. | As surfactants can be used for different purposes other than detergents and are already regulated as "chemicals", the requirements should be fixed by horizontal legislation. |