Von: Kattanek, Ralf

Gesendet:

An:

Lindemann, Henrike (Dr.)

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

Ralf Kattanek Dr. Mareike Uhlein

Geschäftsführer Referentin

Verband TEGEWA e.V. Verband TEGEWA e.V.

Mainzer Landstr. 55 Mainzer Landstr. 55

D - 60329 Frankfurt am Main D - 60329 Frankfurt am Main

phone: +49 (0)69-2556-1628 phone: +49 (0)69-2556-1341 mobile: +49 (0)174-8887203 mobile: +49 (0)151-70351158

mail: ralf.kattanek@vci.de mail: uhlein@vci.de web: www.tegewa.de web: www.tegewa.de

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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

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:

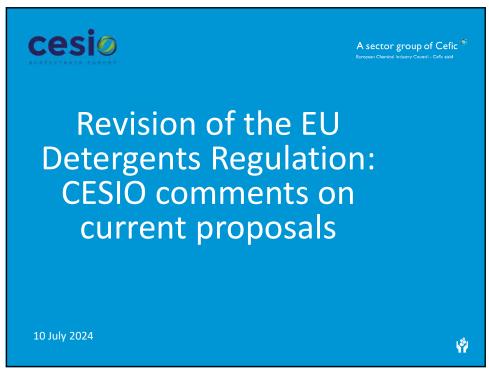
- Wir betonen, wie wichtig eine Angleichung der Definition an die EU-Zolltarifverordnung ist.
- Die derzeit von der Kommission vorgeschlagene Definition ist technisch schwierig anzuwenden.
- Die CESIO hat eine spezielle Arbeitsgruppe, die sich mit den Prüfmethoden für Tenside befasst und nun einen Leitfaden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



1

Background: surfactants used in detergents

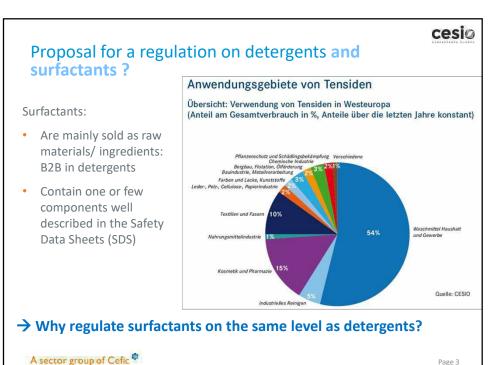


- Surfactants used in detergents already comply with a high level of standards
- Whilst we welcome any targeted improvements and technical developments, especially where efficiencies can be found, we also highlight that the Detergents Regulation was found to be generally fit for purpose following the 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

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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 ightarrow 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 ESPR → avoid duplication of legislation

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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



Internal

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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 <u>develop a guidance on testing methods for determining</u> <u>surfactants, which should be available in October of 2024.</u>
- CESIO remains available to answer any technical questions through our experts if needed.

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	Council proposal REGULATION OF THE FUROPEAN PARLIAMENT AND OF THE COUNCIL on	Commission proposal REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on detergents	Parliament amendments	CESIO choice/rephrasing	CESIO comments
	detergents and surfactants, and repealing Regulation (EC) No 648/2004	and surfactants, amending Regulation (EU) 2019/1020 and repealing Regulation (EC)			
Title	detergents and surfaceants, and repeating regulation (20) 100 040/2004	No 648/2004	No 648/2004		
Recital number					
	The conditions for placing and making available on the market of detergents and	The conditions for placing and making available on the market of detergents and	The conditions for placing and making available on the market of detergents and	The conditions for placing and making available on the market of detergents and	
	surfactants for detergents have been harmonised through Regulation (EC) No	surfactants for detergents have been harmonised through Regulation (EC) No	surfactants for detergents have been harmonised through Regulation (EC) No	surfactants for detergents have been harmonised through Regulation (EC) No	
	648/2004 of the European Parliament and of the Council. The harmonised	648/2004 of the European Parliament and of the Council.	648/2004 of the European Parliament and of the Council.	648/2004 of the European Parliament and of the Council. Surfactants in the scope	
	requirements of that Regulation are related to the particular conditions of use and the disposal of detergents with wastewater, including:			of Regulation are onyl those intended to be used in detergents.	Surfactants are clearly defined (in this regulation under Article 2) as ingredients of detergents (Article 2) # therefore the wording "surfactants and surfactants"
	the disposat of detergents with wastewater, including.				in detergents" confuses this definition and should focus on "surfactants in detergents" propose to clarify the scope under recital 1
Article number Article 2 (11)				CESIO 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	
	'surfactant' means any organic substance or mixture used in detergents, which has surface-active properties	'surfactant' means any organic substance or mixture used in detergents, which has surface-active properties	'surfactant' means any organic substance or mixture used in detergents, which has surface-active properties	hydrophobic groups of such a nature and size that it is capable of fulfilling both of the following criteria: • forms a clear micellar solution or a translucent microemulsion or stable emulsion without separation of	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.
	and which consists or one or more nydrophilic and one or more nydrophilic groups or such a nature and size that it is capable to perform all of the following actions:	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:	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:	insoluble matter when mixed with water at a concentration of 0.5 wt% and left to stand for one hour at 20°C	•The current definition proposed by the Commission is technically difficult to apply. •CESIO has a specific task force devoted to testing methods of surfactants, which will now develop a guidance on testing methods for determining surfactants. See
	- to reduce the surface tension of water below 45 mN/m;	- to reduce the surface tension of water below 45 mN/m;	- to reduce the surface tension of water below 45 mN/m; - to form spreading or adsorption monolayers at the water-air interface;	reduces the surface tension of water to <45 mN/m (at a concentration of 0.5 wt% at 20 °C).	proposed definition under column E. Also, as previously notes, surfactants in the scope of Regulation must be intended as surfactants for detergents.
	- to form spreading or adsorption monolayers at the water-air interface; - to form emulsions and/or microemulsions and/or micelles;	- to form spreading or adsorption monolayers at the water-air interface; - to form emulsions and/or microemulsions and/or micelles;	- to form spreading or adsorption monolayers at the water-air interface; - to form emulsions and/or microemulsions and/or micelles;		
Article 7 (6)	- to adsorpt at water-solid interfaces; Manufacturers placing on the market detergents or surfactants for which there is no obligation to provide	- to adsorpt at water-solid interfaces;	- to adsorpt at water-solid interfaces;		
	information in accordance with Article 45 of Regulation (EC) No 1272/2008, shall provide to Member.	within the meaning of Regulation (EC) No 1272/2008, shall provide to Member States' appointed bodies	(a) at the time of placing a detergent on the market; (b) when	support Commission proposal. This article should be valid only for detergents. Surfactants are B2B chemicals alreday well regulated by REACH and CLP.	Surfactants are raw material chemicals used in B2B transactions that are typically not intended for standalone consumer use I level of regulation should reflect raw material vs. end product use (label requirements, technical documentation, etc). Surfactants are
	States' appointed bodies referred to in that Article, the ingredients data sheet referred to in point 2.2 (e) of Annex IV in the following cases:	1 referred to in Article 45 of that Regulation, the ingredient datasheet referred to in point 2.2 (e) of Annex IV.	the detergent for which a data sheet has already been provided no longer corresponds to the information		regulation should renect 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
	(a) upon request from the Member States' appointed bodies:	Manufacturers shall provide the ingredient data sheet to the Member States' appointed bodies referred to in the first subparagraph in the following cases:	included in that datasheet.		should either be deleted or limited to "surfactants used in detergents sold directly to consumers" avoid unnecessary administrative
	(b) when the detergent or surfactant for which an ingredients data sheet has already been requested no longer corresponds to the information included in that data sheet.	(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			burden. This would be in line with the spirit of recital 7 of all 3 proposals.
	This is without prejudice to the right of a Member State to request that such a data sheet be made.	information included in that datasheet.			
	available to an appointed body to which the Member State has assigned the task of providing this	The appointed body referred to in the first subparagraph and the medical personnel to which the information			
	Information to medical personnel. The ingredients data sheet shall be transmitted using the format and submission tool determined by the	contained in the datasheet has been provided shall keep it confidential and use it for medical purposes only.			
Article 15 (1)	appointed bodies requesting it.	Determine and surfactants that are made sociable on the market in individual marketing of the social state.	Deterients and surfactants that are made qualifolds on the market in individual academics	Proposal is to deleted surfactants as follows: "Data-to-sts and surfactants that are seen."	Laballing of surfactants is radiated by C10 baing chamicals. Surfactants are NO/C0 PO to accompany in militians. We need in accompany
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.	market in individual packaging or in a refill format shall be accompanied by a label." Alternatively, if	Labelling of surfactants is regulated by CLP being chemicals. Surfactants are NEVER SOLD to consumers in refill format. We need in any case to differentiate the requests for 82B and 82C surfactants. Surfactants are ingredients in detergents mainly sold to formulators who are aware of the nature of the surfactants they purchase as a result
				surfactants is not deleted, then the wording should be changed to "Surfactants sold to end consumers or in refill forms!"	of existing technical documentation (anionic, non-ionic, etc). An additional label according to Annex V.1 (c to f) would have no added value and should be deleted or at least limited to surfactants sold to end consumers
Article 22 (1)	Where the mMarket surveillance authorities of one Member State have sufficient reason to believe that a	Where the market surveillance authorities of one Member State have sufficient reason to believe that a	Where the market surveillance authorities of one Member State have sufficient reason to believe that a	in reful format* We support Council proposal for this paragraph.	least limited to surfactants sold to end consumers As mentioned previously, scope must be limited for surfactants to their use in detergents.
	detergent or surfactant presents a risk to health or the environment, they shall may carry out an evaluation in relation to atthe detergent or surfactant concerned covering attreterant requirements laid down in this	detergent or surfactant presents a risk to health or the environment, they shall carry out an evaluation in	detergent or surfactant presents a risk to health, safety or the environment, they shall carry		•
	relation to a the detergent or surfactant concerned covering attretevant requirements laid down in this Regulation. The relevant economic operators shall cooperate as necessary with the market surveillance	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	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		
	authorities for that purpose.	authorities for that purpose.	surveillance authorities for that purpose.		
Article 22 (2)	Where the mM arket surveillance authorities of one Hember State have sufficient reason to believe that a test	 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 	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		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 VIII)> Since the choice of the method depends on the physical properties of the product and can be chosen among the
	may perform controls to verify the compliance of the detergent or surfactant with this Regulation in	perform controls to verify the compliance of the detergent or surfactant with this Regulation in accordance wit	perform controls to verify the compliance of the detergent or surfactant with this Regulation in accordance with	th Market surveillance authorities may perform controls to verify the compliance of the detergent or	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
	accordance with the reference methods set out in the Annexes I, II and VII. Economic operators shall not be	the reference methods set out in Annexes I, II and VII. 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,	the reference methods set out in Annexes I, II and VII. 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,	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	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
	detergents, or surfactants, with this Regulation:	with this Regulation.	with this Regulation.	test has shown compliance of detergents, or surfactants, with this Regulation. Economic operators shall	
Article 26 (6)		Where new scientific evidence points to the need to introduce biodegradability requirements for substances	Where new scientific evidence points to the need to introduce biodegradability requirements for substances	not be obliged to pay for any repeat or additional test, provided that the initial test has shown compliance	The council text offers the opportunity to amend the testing methods for surfactants (Article 26.6 a). Reference testing methods for
		and mixtures other than surfactants in detergents, including detergent capsules, the Commission is	and mixtures other than surfactants in detergents, including detergent capsules, the Commission is		market surveillance should be reviewed to reflect the latest science (article 22. Annex I and VII). However, as mentioned previously.
		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.	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.	We support the Council text with a small modification as follows to clarify scope and to refer to annex	scope must be limited for surfactants to their use in detergents. The wording "surfactants and surfactants in detergents" confuses this
	The Commission is empowered to adopt delegated acts in accordance with Article 27 amending Annex I. and, where appropriate, Article 4 so as to:	When adopting delegated acts in accordance with the first subparagraph, the Commission shall take into	When adopting delegated acts in accordance with the first subparagraph, the Commission shall take into	VII: "The Commission is empowered to adopt delegated acts in accordance with Article 27 amending Annex I: VII and, where appropriate, Article 4 so as to:	definition and should focus on surfactants in detergents. This should be clarified under recital 1 and be consistent with the definition
	a) amend the biodegradability requirements and corresponding test methods for surfactants or	account the current manufacturing practices, the availability of technically and economically feasible alternatives and the impacts to small and medium-sized enterprises.	account the current manufacturing practices, the availability of technically and economically feasible alternatives and the impacts to small and medium-sized enterorises.	a) amend the biodegradability requirements and corresponding test methods for surfactants er-	under Article 2(11).
	surfactants contained in detergents: b) add or amend biodegradability requirements and corresponding test methods for other detergent			surfactants contained in detergents;	
	ingredients, including polymers used to encapsulated detergents;			 b) add or amend biodegradability requirements and corresponding test methods for other detergent ingredients, including polymers used to encapsulated detergents; 	
	ingredients, including polymers used to encapsulated detergents: c) add or amend exceptions authorising the limited use in detergents of specific substances that do not			ingredients, including polymers used to encapsulated detergents; c) add or amend exceptions authorising the limited use in detergents of specific substances that do not	
	ingredients, including polymers used to encapsulated detergents: claded or amend exceptions authorising the limited use in detergents of specific substances that do not comply with the blodegradability 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			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 lad 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	
	ingredients, including polymers used to encapsulated detergents; claded or amend exceptions authorising the limited use in detergents of specific substances that do not comply with the biological adultive requirements laid down by Annex L when duly justified.			ingredients, including polymers used to encapsulated detergents; c) add or amend exceptions authorizing the limited use in detergents of specific substances that do not comply with the biodegradability requirements laid down by Annex I, when dudy justified. If the purpose of the delegated acts in the first subparagiosph shall be be ensure a high level of protection of health and the enricomment. When adopting such delegated acts, the Commission shall lake their dos account.	
	ingredients, including polymers used to encapsulated detergents: claded or amend exceptions authorising the limited use in detergents of specific substances that do not comply with the blodegradability 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			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 lad 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	
	ingredients. Including polymers used to encapsulated detergents: c) add or amond reactions authorising the limited use in between specific substances that do not cause the limited use in the tempers of specific substances that do not comply with the biodeg adubitive requirements laid do not be done. It when duty intellided. The purpose of the designed acts in the first biosoparage shall be to ensure a lain limited of crosscellar of the habitit and the environment. When adopting such delegated acts in the first injuried or lainsess that the demonstration shall take into			lage-dents, including polymers used to encapsolated detergents; c) add or amend experions authorizing 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 discipled acts in the first subsquaragesh 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 adoptise the impact on human health and the environment, the following factors: current manufacturing	
Annex number	ingredients. Including polymers used to ancapsulated detergents: a facetiff, substances that do not caude or amend recordines authorising the limited use in detergents of specific substances that do not comply with the biodegradability requirements told down by dones. L. when doby lacified. The surpose of the despecial exist in the Intrivillage applicability to be convex a high level of a relaction of basility and the environment. When addoring such designed acts, the Commission shall take into second the environment. When addoring such designed acts, the Commission shall take into consideration of the commission of the commissi			ingerdents, including polymers used to exapsulated deleganch; Jador amend exceptions authorising the immediate airs in threspend of specific substances that do not comply with the biologisability requirements laid down by Ameri, when duly justified. The purpose of the designed acts in the first insupangarph shall be some a high level of protection of health and the environment. When adopting such delegated acts, the Commission shall talle into account allarging the impact on human health and the environment. Although feet for current manufacturing practices, the consequences for authorised to environment, the availability of technically and common light feeting listensities and impacts on mail and mediate enforces. Keep title of existing regulation Areas till from EC Regulation 649/2004.	
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