Brussels, January 2024

Dear Members of the ENVI Committee:

The ongoing revision of the Detergent Regulation offers an important opportunity to improve the requirements for detergents in the European market and therefore minimise harmful effects on human health and the environment.

Unfortunately, the European Commission's proposal (April 2023), was lacking in many areas. We are encouraged that the rapporteur's draft report improves upon several important points and additional amendments have been submitted on environmental priorities. Inspiration should be drawn from the EU Ecolabel for detergents. Its requirements, in place since 2017, have been taken up by many industry actors, proving that more environmentally friendly detergents are feasible and realistic.

Detergents still contain harmful substances that impact human health.[1] Recent tests have shown the presence of allergenic substances and endocrine-disrupting chemicals (EDCs) in detergents, as well as substances with toxic effects on the intestinal barrier.[2] [3] A 2024 study showed that two-thirds of wool detergents contain harmful chemicals, including suspected EDCs.[4] Detergents used in households or in occupational settings contain chemicals which, on contact with the skin of people with skin allergies or lung diseases, can lead to flare-up in their symptoms, including skin inflammation, itching, rash, and wheezing.[5] [6] [7]

[1] Identification of combinations of endocrine disrupting chemicals in household chemical products that require mixture toxicity testing - ScienceDirect

[2] Ogulur I, et al. Gut epithelial barrier damage caused by dishwasher detergents and rinse aids. J Allergy Clin Immunol. 2023 Feb;151(2):469-484. doi: 10.1016/j.jaci.2022.10.020.

[3] Many detergents contain unwanted chemicals (taenk.dk)

[4] Unwanted chemicals in wool detergents | Forbrugerrådet Tænk (taenk.dk)

[5] N. Hadrup et al. Asthma-inducing potential of 28 substances in spray cleaning products—Assessed by quantitative structure activity relationship (QSAR) testing and literature review, J Appl Toxicol. 2022 Jan; 42(1): 130–153, https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9291953/pdf/JAT-42-130.pdf

[6] Tas T. A. et al. Occupational Contact Dermatitis in Hospital Cleaning Workers, Dermatitis.Dec 2021, 388-396, https://www.liebertpub.com/doi/10.1097/DER.0000000000000597?url_ver=Z39.88-2003&rfr_id=ori%3Arid%3Acrossref.org&rfr_dat=cr_pub++0pubmed

[7] S. S. Alkotob et al. Advances and novel developments in environmental influences on the development of atopic diseases, Allergy Oct 2020, https://onlinelibrary.wiley.com/doi/10.1111/all.14624

Yet these tests also show that is possible to make cleaning products free of these substances - some detergents are on the market without these chemicals, including the successful EU Ecolabel for detergents.

The current paradigm shift towards a circular economy, where consumers and industry are moving towards more energy-efficient, durable, and reusable solutions, also often means an increase in activities such as cleaning and washing (scaled-up reusable packaging systems for food and non-food, for example).

As an everyday consumer and industrial product, detergents have a significant impact on the environment via water pollution. It is vital that this revision aligns with the EU's Zero Pollution ambition, taking stock and building from the lessons learned from the EU Ecolabel criteria that have already proved to be successful.

For these reasons, we, the undersigned, support the draft report by the ENVI committee and the following amendments. We urge legislators to adopt an ambitious text to improve water quality, protect human health, and decrease intentional and unintentional microplastic release.[8] Any sustainability issues which cannot be addressed in this regulation must be tackled with mandatory requirements in the upcoming ecodesign measures for detergents to be adopted under the Ecodesign for Sustainable Products Regulation.

Key asks:

- Expand the biodegradability requirements to all detergents and surfactants.
- Reduce phosphorus usage.
- Minimise the use of hazardous substances, in line with the Chemicals Strategy for Sustainability (CSS) that identified detergents as a key product in the aim for a toxic-free environment, especially substances classified as endocrine-disruptors, skin sensitisers, and respiratory sensitisers.
- Microplastics and biodegradability concerns.
- Mandatory refill stations in large retailers

Expand biodegradability requirements to all detergents and surfactants.

- Support Amendments 16-20.

Biodegradability requirements must not be limited to only surfactants but include all components of detergents. The requirements must also extend to anaerobic biodegradability to prevent unwanted substances entering the environment.

Reduce phosphorus usage

- Support Amendment 85, Recital 10.

Phosphates and phosphorus compounds in detergents contribute to water pollution and the eutrophication of rivers and other waterways. It is imperative to reduce the amount of these compounds at the source by decreasing the limits in detergents.

Minimise use of hazardous substances, in line with Chemicals Strategy for Sustainability (CSS), especially endocrine-disruptors, skin sensitisers, and respiratory sensitisers

- Support Amendment 21, Article 6a.

Detergents contribute to our continuous exposure to chemical mixtures in products and the environment.[9] It is possible to develop and market detergents that do not contain these substances. Restricting chemicals that are harmful to the environment and human health will uphold the aims of the Zero Pollution Strategy and CSS.

[8] Additional detail on these asks can be found in the ECOS Position Paper: ECOS asks on detergents (ecostandard.org)
[9] Chemical-cocktails_CHEMTrust-report_March-2022.pdf

Microplastics and biodegradability concerns

- Modification of Amendment 193, Article 4.2b.

The amendment proposes that all plastic components in the detergent must be fully biodegradable. Considering doubts about whether microplastic can be truly biodegradable, e.g. Plastic Soup Foundation, Malafeev et al. 2023, the use of microplastics should instead be banned completely. Investigations by Austrian NGOs VKI and Global 2000 found that there is a trend by manufacturers to use soluble instead of solid microplastics - but there are many detergents that do not contain any type of microplastics.

Mandatory detergent refill stations for large economic operators

- Modification of Amendment 22, Article 6b.

We do not support the first paragraph, which requires liquid detergents to be made available in single-use light pouches for refill at home. This is not a genuinely reusable or refillable solution and continues to create waste. Any approach to promote refillable or reusable packaging needs to be in line with the definitions set out in the Packaging and Packaging Waste Regulation - which does not foresee single-use packaging as intermediaries.

We strongly support the second paragraph, introducing mandatory detergent refill stations in large retailers (with a sales area above 400 m^2). A 2021 LCA study showed that a reusable packaging system has nearly 12 times less impact than a single-use system for household detergents. Some retail chains are already installing detergent refill stations, e.g. Kaufland in Germany, Lidl in the Netherlands, and Carrefour in Belgium. Already a decade ago, refill detergents were set up, e.g. in Italy, saving packaging and money for consumers.

Thank you for considering this important file. We are available for any questions you may have.

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On behalf of the following organisations:

- Arnika – Toxics and Waste Programme
- CHEMTrust
- Child Rights International Network (CRIN)
- ECOCITY
- Ecologistas en Acción
- ECOS – Environmental Coalition on Standards
- EFA - European Federation of Allergy and Airways Diseases Patients' Associations
- European Environmental Bureau
- Générations Futures
- Health Care Without Harm Europe
- Hogar sin Tóxicos
- ISDE - International Society of Doctors for Environment, Italy
- Pesticide Action Network (PAN) Germany
- Réseau Environnement Santé
- Rethink Plastic Alliance
- ZERO - Association for the Sustainability of the Earth System
- Zero Waste Europe (ZWE