



ECOS asks on detergents

Trilogues: Detergents Regulation Revision

Brussels, April 2025

ECOS key asks

As an everyday consumer and industrial product, detergents have a significant impact on the environment, such as water pollution and reliance upon plastic packaging. Furthermore, detergents still contain substances that have an impact on human health. The upcoming trilogue discussions for the Detergent Regulation offer an important opportunity to improve the requirements on detergents in the European market and minimise the effects on human health and the environment.

With the new focus on competitiveness and simplifications, the opportunity to improve this regulation to provide a fair playing field for European detergent producers is now. Yet, it is vital that the revision aligns with the EU's Zero Pollution ambition, taking stock and building on lessons learned from the Ecolabel criteria that have already proven to be successful.

ECOS key asks:

- Reduce phosphorus usage by implementing bans on consumer products and setting precise and strict limits on other products,
- Set clear biodegradability requirements on surfactants and polymers,
- Include clear definitions and ambition on refill stations.
- Ensure that detergent bottles and caps can adhere to the design for recycling requirements laid down in the PPWR.

Opportunities to improve:

- Minimise use of hazardous substances, in line with the Chemicals Strategy for Sustainability.

Trilogue Negotiations can align with Zero Pollution vision

As a common product for households and industrial users, detergents have a significant impact on the environment, and in particular water quality and aquatic environments. Their levels of phosphorus and nitrogen compounds lead to the eutrophication of rivers, groundwater can be polluted when components of detergents are not fully biodegradable, and further, microplastics generated from wraps accumulate in these environments¹.

Moreover, substances used in detergents can also have a harmful impact on human health. A recent consumer study found that many detergents on the market still contain endocrine-disrupting chemicals, among other hazardous substances.² It is imperative to phase out these chemicals in detergents as soon as possible to reduce exposure and limit the health effects that result from our continuous exposure to chemical mixtures in products and the environment.³

In April 2023, the European Commission proposed a revision for the Detergents Regulation. The Commission issued, within the context of the European Green Deal, two visions under which detergents must be addressed, the Zero Pollution Action Plan (ZPAP)⁴ and the Chemicals Strategy for Sustainability (CSS)⁵.

- The Zero Pollution vision for 2050 intends to decrease water pollution to “levels no longer considered harmful to health and natural ecosystems”.⁶ In terms of detergents, this means that products must not contain harmful levels of phosphates or substances of concern and must eliminate microplastic generation.
- The Chemicals Strategy for Sustainability set out the goal that consumer products, including detergents, would not contain chemicals which are carcinogenic, mutagenic, reprotoxic, endocrine-disruptors, or which are persistent and bioaccumulative, with the intention to additionally address chemicals that affect the immune, neurological, or respiratory systems and chemicals with specific organ toxicity.

Unfortunately, the Commission’s proposal on Detergents⁷ did not incorporate the ambition of the CSS or the ZPAP. While the Commission’s proposal improved some aspects of biodegradability, it did not go far enough because only surfactants are covered and several types are exempted. But it is not too late: the Council and Parliament both added much needed improvements. The Parliament’s amendments adding limits on phosphorus and phosphate content should be carried through to the final text, while both the Parliament and Council have suggested amendments on improving biodegradability on polymers.

When it comes to substances of concern, it was disappointing but not unexpected to see that none of the three institutions took the opportunity to address the fact that some detergents still contain substances that are hazardous to human health. The revision mandates a new digital product passport for detergents and surfactants, but does not extend any information requirements as would be included if detergents were addressed under the ESPR. This is a missed opportunity to improve the transparency of substances used in detergents and allow consumers and other users better awareness of what substances are used in the products they choose to purchase.

We will continue to call for these improvements in the sector whenever an opportunity is at hand. In the assessment of the detergents sector’s impact on the environment for potential work under the Ecodesign for Sustainable Product Regulation, the Joint Research Centre identified key areas of concern to be addressed under this revision – primarily relating to water effects. **The JRC highlighted the need for several improvements in the Detergents Regulation revision, in particular, restricting or**



banning compounds causing water pollution, requirements on biodegradability of plastics, and substances causing health effects due to hazardous properties. We agree.

Let's not miss this opportunity - don't wait for ESPR

While we welcome the possibility of detergents to be covered under the Ecodesign for Sustainable Product Regulation framework (ESPR), and it was indeed identified as a priority sector by the JRC, ECOS calls for the colegislator to make sure we fix gaps in the current legislation that is on the table (Revision of Detergents Regulation). There is no reason to wait for an ESPR delegated act to be developed, and indeed, the Commission has indicated that the sector will not be addressed in the first working plan under the ESPR. This means that detergents will not be addressed for improved sustainability measures until after 2030.

This legislative opportunity should not be lost to reduce water pollution, decrease unnecessary chemical exposure, and minimise microplastic emissions. We strongly encourage legislators to address identified issues as quickly as possible: and that is within this revision.

Detergents Regulation Revision – Trilogue Priorities

In this paper, we will look at the proposals for phosphates and phosphorus, biodegradability and polymers, packaging, refill and design for recycling, and then a final look at substances of concern.

In each section, we will present our priority recommendation, with additional details explained in the text. Then we will present the positions of the three institutions, alongside our more specific recommendations for the trilogue (an adapted four column document). In a few cases, we give a suggested improvement on the text.

In general, we support actions taken now in the revision. We do not generally support delaying tactics found in Article 31 that direct the Commission to research and write reports for future improvements. There is no guarantee of future revisions coming in a timely manner. There is enough evidence now that alternatives exist and that the environmental performance of detergents can be improved.

A note on delegated acts and European standards:

This legislation, like many in this period, is requiring the development of several delegated acts that may eventually rely upon European standards for implementation. The Council's position includes language about how the Commission should “take into account European standards” when developing these delegated acts. We have observed in other ongoing processes that the timing for the development of standards under other procedures than standardisation requests is oftentimes too short for the entire process to properly unfold. Therefore, we urge legislators to consider common standardisation request processes to the European standardisation organisations and the amount of time it takes to develop the corresponding harmonised standards.

Our concrete suggestions

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1. Phosphates and Phosphorus Content

Recommendation: Phosphate/phosphorus compounds limit in line with current EU Ecolabel limits should be included for industrial/professional detergent categories. For the consumer categories, exclude phosphates altogether from consumer categories and phosphorus compound limits should be in line with the EU Ecolabel limits.

We support the Parliament's positions on consumer detergents to ban phosphate from consumer laundry detergents and impose stricter limits on the phosphorus. This is in line with current EU Ecolabel requirements^{8,9}.

We also support the Parliament's position on industrial detergents, which sets limits on total phosphorus content. This is again supported by current EU Ecolabel requirements, showing the feasibility of lower phosphorus content: 'professional detergents'¹ like industrial and institutional usages¹⁰, set limits on phosphorus.

There is clear evidence via EU Ecolabels and other similar labels that stricter limits can be set upon professional usage and further reductions put in place for consumer usage, showing that suitable alternatives already exist.

Wastewater facilities should not bear the burden of reducing phosphorus and phosphate content when it can be done at the source, and especially in the next years as these facilities come under additional pressure to address the PFAS drinking water crisis.

Phosphate reserves are a limited resource and should be utilised only when there are no suitable alternatives or when there are essential needs (such as agricultural purposes, for instance). Using higher than necessary amounts in detergents when alternatives exists is not a prudent use of this resource.

¹ 'professional detergent' means a detergent for cleaning outside the domestic sphere, carried out by specialised personnel using specific products; Proposal Article 2(5)



These requirements must then be backed up by tests that ensure biodegradability. The current requirements do not do enough to protect the environment by creating potential loopholes that could allow substances that are not fully biodegradable to end up in sewage sludge.

Limitations on the content of phosphates and other phosphorus: Art. 6 / Annex III / Article 31

| Commission | Parliament | Council | ECOS |
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| See clip in Annex to this paper | See clips in Annex to this paper | See clip in Annex to this paper | Support Parliament's formulations; they provide better environmental protection while providing specific standards tailored to each product category. |
| | | <p>Article 31</p> <p>By [OP: please insert the date = 7 years from the date of entry into force of this Regulation], the Commission shall assess the effectiveness and relevance of the requirements of this Regulation and shall submit to the European Parliament and to the Council a report on the application of this Regulation. The report shall contain an assessment of how this Regulation is achieving its objectives and shall include at least the following elements:</p> <p>iv. As regards detergents containing phosphates and other phosphorus compounds, the possibility to limit further the</p> | <p>ECOS does not support the delegation of additional unfunded research to the Commission when the action could be taken now.</p> <p>Furthermore, as seen in the EU Ecolabel, it is possible to set these limits, showing that "suitable alternatives" already exist.</p> |



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| | | phosphorus content or add limitations of phosphorus content on other products categories to Annex III; this assessment should take into account the impact on the environment, the availability of suitable alternatives with less or no phosphorus and the socio-economic impact of substitution. | |
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2. Biodegradability – Surfactants and Polymers (art.4, art. 26, art 31, annex)

Surfactant Biodegradability

Recommendation: eliminate exemption for surfactants and improve testing requirements to ensure aerobic and anaerobic biodegradability

The exemptions in Article 4(2) for certain surfactants are unnecessary and can create a loophole. All ingredients and components must be biodegradable. This should additionally include surfactants that are classified as hazardous to the aquatic environment, which should be anaerobically biodegradable, as is laid down in the EU Ecolabels for the sector now.

Avoid the risk of microplastics generation

Recommendation Given the approach suggested by the Commission in “EU actions against microplastics”, we call for co-legislators to not allow detergents and detergent "tablets" and “capsules” to be wrapped in any plastic, not even when it is intended for biodegradability, as testing methods do not yet reflect real world conditions. If this ban is not feasible, then we support the additions from Parliament and Council to adopt delegated acts laying down biodegradability requirements and methods for these polymers.

The original proposal missed an opportunity to address the generation of microplastics via the proliferation of supposed “water-soluble” plastic films encapsulating detergents. While intentionally added microplastics are now restricted, the restriction exempted soluble and biodegradable polymers. We have long campaigned^{11, 12} against this exemption because biodegradable plastics can present similar hazards in the natural environment to plastics, and the testing methods for biodegradable plastics do not yet reflect realistic use or existing environmental conditions.

Detergent capsules were included as part of the Impact Assessment work undertaken by the Commission on the unintended release of microplastics. This work culminated with the publication of a document called “EU action against microplastics”¹³, which includes a section on detergent capsules (starting on page 14).

"Detergent capsules [...] rely on a water-soluble film, mainly composed of polyvinyl alcohol (PVOH), which is designed to dissolve during the washing cycle. While the biodegradation of PVOH in



*detergent capsules has been demonstrated under stringent screening tests, more research is needed into the full biodegradability of the available PVOH-based grades in all environmental media and their possible emissions of microplastics into the environment. The proposal for a revised Detergent Regulation will empower the Commission to lay down **biodegradability requirements and testing methods for detergent capsules when new scientific evidence requires.**"*

This empowerment is included in Article 26 as a delegated act that empowers the Commission to create new requirements on biodegradability when new scientific evidence "points to the need". Requirements on biodegradability should be included in the regulation and should not be delayed further. In 2024, we also contributed to the open public consultation regarding the biodegradability criteria for polymers in different types of fertiliser products used in the EU.¹⁴ In that analysis, we found that the proposed delegated regulations should have been improved in technical accuracy and specificity, as some assumptions were made that do not necessarily hold up in real world conditions. Therefore, we will be following this development closely to ensure that delegated test methods are held to the highest scientific accuracy.

We still prefer a full ban on capsule-style dosing to avoid the intentional use of a plastic material that does not fully biodegrade. There are alternative product designs to plastic-based biodegradable pods: powder or liquid detergents sold in packaging belonging to a reuse system or sold through refill systems at the point of sale.



Article 4: Biodegradability of other constituents

| Commission | Parliament (amd. 50) | Council | ECOS |
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| | <p>2a. By... [4 years from the entry into force of the delegated act adopted in accordance with the second subparagraph] organic ingredients of detergents other than surfactants shall be inherently biodegradable.</p> <p>By... [two years from the date of entry into force of this Regulation], the Commission shall adopt delegated acts in accordance with Article 27 to supplement Annex I with inherent biodegradability criteria and test methods for constituents other than surfactants.</p> <p>Where necessary, the Commission is empowered to adopt delegated acts in accordance with Article 27 to allow for the use of substances in detergents that do not comply with the biodegradability criteria established in accordance with Annex I.</p> <p>When adopting delegated acts in accordance with the second and third subparagraphs, the Commission shall take into account manufacturing practices, the availability of technically and economically feasible alternatives, the impact on small and medium-sized enterprises and the impact on health and environment.</p> | <p>4. Other organic ingredients contained in detergents placed on the market from two years after the adoption of the delegated act referred to in Article 26(6a), second subparagraph, shall comply with the biodegradability requirements laid down in Annex I(C).</p> | <p>We are strongly supportive of either formulation of this welcomed addition to the original proposal, which will improve the biodegradability of additional constituents in detergents. In general, we support more specificity regarding the timeline for adoption and prefer that this measure is actionable as soon as possible.</p> |

Article 4: Biodegradability of Polymers

| Commission | Parliament (amd 51) | Council | ECOS |
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| | <p><i>2b. By... [two years from the entry into force of the delegated act adopted in accordance with the second subparagraph], water-soluble film around detergents shall be degradable.</i></p> <p><i>By... [18 months from the date of entry into force of this Regulation], the Commission shall adopt delegated acts in accordance with Article 27 supplementing Annex I with criteria and test methods for the degradability of water-soluble film around detergents.</i></p> | <p>3. Polymers used to encapsulate detergents placed on the market from two years after the adoption of the delegated act referred to in Article 26(6a), first subparagraph, shall comply with the biodegradability requirements laid down in Annex I(B)</p> | <p>We would prefer an outright ban on the use of polymers and substances which are used to encapsulate detergent products. However, if that option is not possible in this revision, we are strongly supportive of the initiative to set guidelines for the biodegradability of these products. It is important to get the terminology correct and that is to use the phrase “substances which are used to encapsulate detergents”. This phrasing will ensure that all potential substances are included in the biodegradability requirements, not only polymers. In general, we support more specificity regarding the timeline for adoption and prefer that this measure is actionable as soon as possible.</p> |
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Article 26: Delegated Powers (Biodegradability & Polymers)

| Commission | Parliament | Council | ECOS |
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| | | <p>1a. The Commission is empowered to adopt delegated acts in accordance with Article 27 amending Annexes I to V and VII where necessary to adapt those annexes to technical and scientific progress. When drafting these acts, the Commission shall take into account any relevant European standards.</p> | <p>We recommend the following language:</p> <p>When drafting these acts, the Commission shall take into account <i>widely recognised scientific evidence and other technical information, including</i> any relevant European standards.</p> |



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| | | 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: | |
| 6. 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. | | <p>a) amend the biodegradability requirements and corresponding test methods for surfactants or surfactants contained in detergents;</p> <p>b) add or amend biodegradability requirements and corresponding test methods for other detergent ingredients, including polymers used to encapsulated detergents;</p> <p>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.</p> <p>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.</p> | <p>ECOS prefers the wording by the Council – we do not see a need to include the specification about “new scientific evidence” as delegated acts to improve the biodegradability of other organic constituents and polymers should be adopted as soon as possible.</p> <p>As regards the final paragraph in the Council’s amendment, we do not agree that the Commission must take into account “current manufacturing practices”, “the availability of technically and economically feasibility alternatives”, or “impacts on small and medium-sized enterprises.” As shown with the EU Ecolabel examples, these alternatives already exist and it is only in the past dozen or so years that polymer capsules have been introduced to the marketplace, showing that they are not a necessary accessory for use of detergents. The biodegradability methodologies laid out</p> |



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| | | | in a future delegated act should take into account only scientifically-based information. |
| | | <p>6a. By ... [3 years from the date of entry into force of this Regulation], The Commission shall exercise the power referred to in paragraph 6, first subparagraph, point (b), to add biodegradability criteria for polymers used to encapsulate detergents and appropriate standard assays in Annex I(B).</p> <p>By... [5 years from the date of entry into force of this Regulation], the Commission shall exercise the power referred to in paragraph 6, first subparagraph, point (b), to add biodegradability requirements to any other organic ingredients contained in detergents and appropriate standard assays in Annex I(C).</p> | In general, we support this amendment but believe the timeline should be accelerated. |

Article 31: Review (Biodegradability)

| Commission | Parliament | Council | ECOS |
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| | | <p>By [OP: please insert the date = 7 years from the date of entry into force of this Regulation], the Commission shall assess the effectiveness and relevance of the requirements of this Regulation and shall submit to the European Parliament and to the Council a report on the application of this Regulation. The report shall contain an assessment of how this Regulation is achieving its objectives and shall include at least the following elements:</p> <p>ii. As regards biodegradability, an assessment of biodegradability requirements for ingredients covered by Article 4 compared to</p> | While in general ECOS does not support additional research delegation, provided that the final text contains the above recommended inclusions on additional biodegradability requirements of organic constituents and polymers, we would support this additional research element to determine how the new requirements are being carried out. This addition would also set a foundation for the future updating of this regulation. |



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| | | the biodegradability of the detergent as a whole, as well as an assessment of whether it is necessary to ban certain ingredients and to strengthen the biodegradability requirements; | |
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3. Packaging and Refill (Recital 37, art. 2), Labelling requirements (art. 15, art. 17), and Design for Recycling of Measuring Cups (Annex V, point 7)

Recommendation We support the recognition of refill and refill stations of detergents and the objective to promote this form of sale of detergents. The Regulation should promote refill using refillable packaging only as opposed to refill systems at home that function with single-use packaging (e.g. single-use pouches to fill up a refillable container).

Refill stations of detergents, if mainstreamed, would lead to a significant positive environmental impact by reducing the demand for plastic. 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. Already a decade ago, refill detergents were set up, saving packaging and money for consumers.

We welcome the attempt to clarify labelling requirements for refill stations. Refill stations should introduce procedures that allow meeting the necessary information requirements for customers of detergents. While economic operators should ensure that these information requirements are available to the customer (upon request and where needed), for instance, through print-outs or stickers of the label, ensuring that this is affixed to the container of every customer is an unnecessary burden.

While ECOS agrees that consumer safety and product use must be a priority, the requirements around a physical label must not impede the development of refill stations and use of refillable containers for detergents. These requirements could present obstacles to retailers establishing refill stations in their stores.

Regarding the measuring cups of bottles, we recommend that the colegislators refer to the PPWR, Annex II, Table 4 (about colours and inks).¹⁵ The measuring cups will need to comply with delegated acts about design for recycling under the PPWR. The current wording “significantly contrast”, as suggested by the EP, may pose challenges for design for recycling.

Recital 37

| Commission | Parliament | Council | ECOS |
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| (37) Since detergents have the same use and present the same risks irrespective of the format in which they are made available on the market, economic operators making detergents available on | (37) Since detergents have the same use and present the same risks irrespective of the format in which they are made available on the market, economic operators making detergents available on | | We support the first addition of the European Parliament. Customers of refill stations should always be enabled to read all mandatory information about the product before making a purchasing decision. |



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| <p>the market in a refill format should ensure that these comply with the same requirements as the pre-packaged ones. In addition, consumers should receive the required labelling information also when opting for refilled detergents. The refill sale of detergents should, therefore, be explicitly covered by this Regulation in order to ensure a high level of protection of health and the environment and a level playing field for economic operators.</p> | <p>the market in a refill format should ensure that these comply with the same requirements as the pre-packaged ones. In addition, consumers should receive the required labelling information also when opting for refilled detergents. <i>A physical copy of the label should also always be visible at the refill station.</i> The refill sale of detergents should, therefore, be explicitly covered by this Regulation in order to ensure a high level of protection of health and the environment and a level playing field for economic operators. <i>In order to further the Union's transition towards a circular economy, the reuse and refill of packaging should be encouraged and promoted. Manufacturers and final distributors should, where feasible, enable and further develop the sale of detergents in refill format at the point of sale and should endeavour to make detergents available to consumers in other sustainable sales forms, for example by making detergents available in recyclable packaging that allows consumers to refill the appropriate packaging at home, where possible while ensuring the safety of consumers.</i></p> | | <p>We only partly support the second addition of the European Parliament. We are in clear favour of refill systems that are operated with reusable packaging over refill systems that operate with single-use packaging (e.g. delivery of single-use pouches to fill the original reusable container at home). These systems contribute to plastic waste, even if the pouches are lighter than traditional packaging. Moreover, the lightweight packaging can be more challenging to recycle due to the fact that they are often multi-layer. In addition, there is a higher risk of safety issues with refill at home systems due to the potential of mishandling. We recommend a focus on refill on site systems (at the point of sale).</p> |
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Article 2: Definitions (refill)

| Commission | Parliament | Council | ECOS |
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| (33) 'refill' means the operation by which the detergent is filled in-store from a large container in the end-users' own package either manually or through automatic or semi-automatic equipment; | (33) 'refill' means the operation by which <i>a consumer or a professional user fills a packaging with a detergent offered by a supplier</i> in the <i>course of a commercial activity, whether in return for payment or free of charge</i> ; | (33) 'refill' means the on-site operation by which a detergent or surfactant offered by an economic operator in the course of a commercial activity, whether in return for payment or free of charge, is filled in a packaging ; the detergent is filled in-store from a large container in the end-users' own package either manually or through automatic or semi-automatic equipment; | We support the definition of "refill" of the European Commission. It is aligned with the EU's packaging rules (Packaging and Packaging Waste Regulation EU 2025/40) in the sense that it clarifies that the ownership of a refillable packaging is with the end user. It also clarifies that the objective of the regulation is to promote in-store filling as opposed to filling at home (e.g. using single-use plastic pouches). |
| | | (33a) 'refill station' means a place where an economic operator offers to end-users a detergent or surfactant that can be acquired through refill, either manually or through automatic or semi-automatic equipment; | |

General Labelling Requirements (art. 15)

| Commission | Parliament | Council | ECOS |
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| 2. An economic operator making a detergent available on the market directly to an end-user in a refill format shall provide the physical label or the data carrier through which the digital label is | 2. An economic operator making a detergent available on the market directly to an end-user in a refill format shall provide the physical label <i>and</i> the data carrier through which the digital label is | 2. An economic operator making a detergent or surfactant available on the market directly to an end-user in a refill format shall provide the physical label or the data carrier through which the digital label is | We support the European Commission's approach to oblige the economic operator to provide the physical label to end-users. In practice this could be fulfilled by |



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| accessible to the end-user. | accessible to the end-user. | accessible to the end-user and shall ensure that the physical label is affixed on every packaging that is refilled with a detergent or surfactant. | making available print-outs or stickers to end-users upon request at the time of the transaction through refill. We believe that the requirement to ensure that the physical label is affixed should not be the responsibility of the economic operator. The customer should be able to decide if it needs to be affixed or not. |
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Forms of Labelling (art. 16)

| Commission | Parliament | Council | ECOS |
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| 2. By way of derogation from paragraph 1, where detergents are made available on the market directly to an end-user in a refill format, the label elements set out in Article 15(3) and (4) may be provided in a digital label only, with the exception of dosage information for consumer laundry detergents as set out in point 1 and 2 of part B of Annex V, which needs to be provided also on a physical label. | 2. Where detergents are made available on the market directly to an end-user in a refill format, the <i>operator shall ensure that the label elements set out in Article 15(2), (3) and (4) are affixed to the packaging.</i> | 2. All the labelling elements corresponding to the detergent or surfactant supplied at a refill station shall be visibly and legibly displayed mentioned on the refill station. | We support the Council's position. |

Measuring Cup design (Annex V point 7)

| Commission | Parliament | Council | ECOS |
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| (c) the capacity of any measuring cup, if provided, shall be | (c) the capacity of any measuring cup, if provided, shall be | (c) the capacity of any measuring cup, if provided, shall be | We generally support the additions of the EP, but would |



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| indicated in millilitres or grams, and markings shall be provided to indicate the dose of detergent appropriate for a standard washing machine load for soft, medium and hard water hardness levels, | indicated in millilitres or grams, and <i><u>clearly visible</u></i> markings shall be provided <i><u>that significantly contrast the colour of the measuring cup</u></i> to indicate the dose of detergent appropriate for a standard washing machine load for soft, medium and hard water hardness levels, | indicated in millilitres or grams, and markings shall be provided to indicate the dose of detergent appropriate for a standard washing machine load for soft, medium and hard water hardness levels, | recommend that the deletion of the phrase “significantly contrast”, as that may pose challenges for the design for recycling requirements laid out under the PPWR. |
| | <i><u>(ca) for detergents packed in bottles, the dose of detergent appropriate for a standard washing machine load at least for soft and medium water hardness level shall be provided by clearly visible markings on the lid, that significantly contrast the colour of the lid.</u></i> | | |

4. Not too late to address hazardous substances

Recommendation: to avoid hazardous substances, the regulation should adopt the criteria already laid out in the current EU Ecolabel while introducing requirements to phase out substances meeting the above CLP criteria. Moreover, this revision misses an opportunity to mandate information requirements for the traceability of substances in the new digital product passport for detergents.

The absence of any requirements on hazardous substances or other substances of concern in the Commission’s proposal and now the legislators’ positions must be remediated. Considering that there was a specific mention of detergents in the Chemicals Strategy for Sustainability, there was clearly an awareness within the Commission of the continuing use of substances of concern in detergents, so we call on legislators to adopt a more ambitious position.

Hazardous substances are still used in detergents. The Danish Consumer Council THINK Chemicals recently released a study earlier with the results from testing 196 different laundry and cleaning products.¹⁶ The analysis showed that 67 products contained substances harmful to the environment, 19 contained suspected endocrine disrupters, and six contained substances suspected of damaging reproduction. In addition to those results, 108 products contained allergenic preservatives.

Detergents still contain harmful substances that impact human health.¹⁷ 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.¹⁸ A 2024 study showed that two-thirds of wool detergents contain harmful chemicals, including suspected EDCs.² 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^{19, 20, 21}.

We recommend that hazardous substances are excluded and restricted in line with what is outlined in the EU Ecolabel requirements.

Moreover, the revision mandates a new digital product passport for detergents and surfactants, but does not extend any information requirements as would be included if detergents were addressed under the ESPR. This is a missed opportunity to improve the transparency of substances used in detergents and allow consumers and other users better awareness of what substances are used in the products they choose to purchase. Negotiators could choose now to include these information requirements.

It is not too late to add language that addresses these substances and we urge the negotiators to take more ambition.

The below tables show how the institutions are currently addressing substances of concern:

Article 31: Review

| Commission | Parliament | Council | ECOS |
|------------|---|---|---|
| | <p>By [OP: please insert the date = 5 years from the date of application of this Regulation], the Commission shall submit to the European Parliament and to the Council a report on the application of this Regulation. The report shall contain an assessment of:</p> <p><i>(f) the environmental, health and socio-economic costs and benefits of extending the generic approach to risk management to detergents and surfactants and of phasing out substances of concern, including those that cause cancers, gene mutations,</i></p> | <p>By [OP: please insert the date = 7 years from the date of entry into force of this Regulation], the Commission shall assess the effectiveness and relevance of the requirements of this Regulation and shall submit to the European Parliament and to the Council a report on the application of this Regulation. The report shall contain an assessment of how this Regulation is achieving its objectives and shall include at least the following elements:</p> | <p>ECOS recommends that this work be done under this revision and not outsourced to the Commission as a delay tactic.</p> <p>However, if a review and research effort is the most that can be achieved, then it should occur as soon as possible: 7 years is by far too long. We propose that the report be submitted after 3 years, so that it is ready for the next ESPR working plan proposal period. Additional delays</p> |



| | | | |
|--|--|---|---|
| | <p><i>affect the reproductive or the endocrine system, are persistent and bioaccumulative, affect the immune, neurological or respiratory systems or are toxic to a specific organ, taking into account combination effects, in order to achieve a non-toxic environment.</i></p> <p><i>The report shall be accompanied, where appropriate, by a legislative proposal.</i></p> | <p>iii. As regards the protection of health and the environment from the most harmful substances and biocidal active substances, an assessment of the need to include or adapt provisions in this Regulation in respect of the presence of these substances in detergents and surfactants; this assessment shall take into account the interaction of this Regulation with other relevant Union law, and shall exclude biocidal active substances listed in Annex I of Regulation (CE) No 528/2012; and</p> | <p>will only compound further regulatory delays, meaning that exposure and harms of these hazardous substances are increasing each day.</p> |
|--|--|---|---|

Article 26: Delegated Powers (Substances)

| Commission | Parliament | Council | ECOS |
|--|------------|---|--|
| <p>Where individual risk-based concentration limits for fragrance allergens are established in Regulation (EC) No 1223/2009 of the European Parliament and of the Council, the Commission shall adopt delegated acts in accordance with Article 27 amending Annex V in order to adapt the limit of the allergenic fragrances listed in Annex III to that Regulation accordingly.</p> | | <p>7. Where individual risk-based concentration limits for fragrance allergens are introduced or amended in Regulation (EC) No 1223/2009 of the European Parliament and of the Council, the Commission shall adopt delegated acts in accordance with Article 27 amending Annex V in order to adapt it to the limit of the fragrance allergens listed in Annex III to that Regulation accordingly.</p> <p>7a. Where new fragrance allergens are listed in Annex II or Annex III of the European Parliament and of the Council, the</p> | <p>We support this addition to ensure that this regulation maintains flexibility and can more quickly limit fragrance allergens when needed.</p> |



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| | | Commission shall adopt delegated acts in accordance with Article 27 in order to add these fragrance allergens in the Appendix to Annex V. | |
|--|--|---|--|

Conclusion

We call for co-legislators to improve and reinforce the initial proposal and align it truly with the ZPAP and CSS visions. As a commonplace consumer product, this legislation has the ability to improve environmental health and decrease pollution significantly. We urge the European Parliament and the Council to adopt ambitious positions to better protect health and the environment.

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