



Dear negotiators:

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. The Zero Pollution vision for 2050 intends to decrease water pollution to “levels no longer considered harmful to health and natural ecosystems”.¹ In terms of detergents, this means that products must not contain harmful levels of phosphates and substances of concern and must eliminate microplastic emissions.

As an everyday consumer and industrial product, detergents have a significant impact on the environment such as water pollution and reliance on plastic packaging. 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, and in order to uphold the right to a clean, healthy and sustainable environment, we, the undersigned urge co-legislators to adopt an ambitious text to improve water quality, protect human health, and decrease microplastic release.

There is no reason to delay these sustainability measures. While detergents is on the list of products in the ESPR regulatory text, and while the JRC analysed the sector in the priority products research, the Commission has indicated that detergents will not be included in the first ESPR working plan. This means that there will not be another chance to improve the impact of this sector by 2030.

In general, we support actions taken now in the revision. We do not support the 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 safe alternatives exist and that the environmental performance of detergents can be significantly improved.

Our priority topics are:

- Phosphates and phosphorus,
- Biodegradability and avoidance of microplastic releases,
- Packaging, refill, labelling, and design for recycling, and
- Substances of concern,

¹ [Zero pollution action plan – European Commission \(europa.eu\)](https://european-council.europa.eu/media/e3000420/1/attachment_data/data/file/114222.pdf)

Phosphates and phosphorus:

We support the Parliament's positions on consumer detergents to ban phosphate from consumer laundry detergents and impose stricter limits on the phosphorus. We also support the Parliament's position on industrial detergents, which sets limits on total phosphorus content. Both of these positions are supported by current EU ecolabel requirements, which shows the feasibility of lower phosphorus content.

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 few years as these facilities come under additional pressure to address the PFAS drinking water crisis.

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.

Biodegradability

All ingredients and components in detergents must be biodegradable to protect water quality. This includes surfactants; therefore we recommend eliminating exemptions for surfactants.

Biodegradability standards must also be strictly applied to any supposedly water-soluble films that are used to encapsulate detergents. The original proposal missed the opportunity to ban these films altogether. This is unfortunate that the restriction on intentionally added microplastics exempted "soluble and biodegradable polymers," because the products do not always biodegrade as hoped when in real world conditions.

Requirements on biodegradability should be included in the regulation and should not be delayed further. 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 included by the EP and Council positions to develop guidelines for the biodegradability of these products. It is important to get the terminology correct, 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, and not only polymers.

Packaging, refill, labelling, and design for recycling

We support the recognition of refill and refill stations for detergents and the objective to promote this form of sale for detergents. In a circular economy, detergent packaging and products should be designed for reuse and recycling, with initiatives like refillable containers and reusable packaging systems playing a key role. The Regulation should therefore promote refill on site using refillable packaging only, as opposed to refill systems at home that rely on single-use packaging (e.g. single-use pouches to fill up a refillable container).

Refill stations for detergents, if mainstreamed, would lead to a significant environmental impact reduction by reducing the demand for plastic and primary packaging in general, minimising resource depletion and waste. While we agree 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 measuring cups in bottles, we recommend that co-legislators refer to the PPWR, Annex II, Table 4 (about colours and inks).² Measuring cups will need to comply with delegated acts on design for recycling under the PPWR. The current wording “significantly contrast”, as suggested by the EP, may pose challenges for design for recycling. We recommend removing that phrase for ease of compliance with the upcoming DAs.

Substances of concern

The absence of any requirements on the most hazardous substances or other substances of concern in the Commission's proposal and the co-legislators' positions must be remediated. Given the specific mention of detergents in the Chemicals Strategy for Sustainability, there was clearly an awareness within the Commission of the continuing use of the most harmful chemicals in detergents and an intention to phase them out, so we call on legislators to adopt a more ambitious position on this topic. We recommend that hazardous substances are excluded and restricted in line with what is outlined in the EU Ecolabel requirements.

Thank you for your time and consideration on this important file. We are available to answer any questions you may have.

Sincerely,

Emily Best
Programme Manager, ECOS

On behalf of:

- Child Rights International Network (CRIN)
- Corporate Europe Observatory
- ECOCITY
- Ecologistas en Acción, Spain
- Friends of the Earth Cyprus
- Humusz Szövetség
- Ocean. Now!
- Plastic Change
- Plastic Soup Foundation
- SEAS AT RISK
- SEPANSO Aquitaine, France
- ZERO - Associação Sistema Terrestre Sustentável
- Zero Waste Europe

² [Regulation \(EU\) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation \(EU\) 2019/1020 and Directive \(EU\) 2019/904, and repealing Directive 94/62/EC \(Text with EEA relevance\)](#)