



List of detergent products or chemical substances prohibited or restricted for sale in bulk on a self-service or assisted-service basis

Pursuant to Decree No 2023-837 of 30 August 2023, which establishes the list of products prohibited or restricted for bulk sale, and to the CLP Regulation as amended in 2024¹.

Please note that the list of detergent products prohibited for bulk sale may evolve in the context of the revision of the EU Regulation on detergents². We are working on this matter in order to verify whether lobbying action at European Union or national level is necessary.

The following substances or mixtures are prohibited for sale in bulk, whether on a self-service or assisted-service basis:

- substances or mixtures whose packaging is fitted with a child-resistant fastening;
- substances or mixtures whose packaging bears a tactile warning of danger;
- substances or mixtures prohibited for sale to the general public ;
- substances or mixtures classified as H317 — skin sensitisation, all categories — and H318 — serious eye damage, category 1 — are prohibited for sale in bulk, whether on a self-service or assisted-service basis, pursuant to the CLP Regulation as amended in 2024.

1) Substances or mixtures whose packaging is fitted with a child-resistant fastening



Where the packaging contains a substance or mixture which meets the requirements of Annex II, section 3.1.1, it must be fitted with a child-resistant fastening.

These are substances or mixtures supplied to the general public and classified as presenting one or more of the following hazards:

- acute toxicity, categories 1 to 3;
- specific target organ toxicity — single exposure, category 1;
- specific target organ toxicity — repeated exposure, category 1;
- skin corrosion, category 1;
- aspiration hazard;
- containing methanol at a concentration equal to or greater than 3 % and/or dichloromethane at a concentration equal to or greater than 1 %.

¹ Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures (CLP)

² Regulation (EC) No 648/2004 of the European Parliament and of the Council of 31 March 2004 on detergents

2) Substances or mixtures whose packaging bears a tactile warning of danger

Where the packaging contains a substance or mixture which meets the requirements of Annex II, section 3.2.1, it must bear a tactile warning of danger.

These are substances or mixtures supplied to the general public and classified as presenting one or more of the following hazards:

- acute toxicity;
- skin corrosion;
- germ cell mutagenicity, category 2;
- carcinogenicity, category 2;
- reproductive toxicity, category 2;
- respiratory sensitisation;
- specific target organ toxicity — STOT — category 1 or 2;
- aspiration hazard;
- flammable gases;
- flammable liquids, category 1 or 2;
- flammable solids.

3) Substances or mixtures prohibited for sale to the general public

These are substances or mixtures classified as presenting one or more of the following hazards:

- germ cell mutagenicity, categories 1A and 1B;
- carcinogenicity, categories 1A and 1B;
- reproductive toxicity, categories 1A and 1B.

4) Summary

Products prohibited for sale in bulk, whether on a self-service or assisted-service basis



Acute toxicity, categories 1, 2 and 3

All products whose packaging bears this hazard pictogram are prohibited for sale in bulk.



- Specific target organ toxicity — STOT — single exposure, categories 1 and 2
- Specific target organ toxicity — STOT — repeated exposure, categories 1 and 2
- Respiratory sensitisation, categories 1, 1A and 1B
- Germ cell mutagenicity, categories 1A, 1B and 2
- Carcinogenicity, categories 1A, 1B and 2
- Reproductive toxicity, categories 1A, 1B and 2
- Aspiration hazard, category 1

All products whose packaging bears this hazard pictogram are prohibited for sale in bulk.



Products bearing this hazard pictogram are not all prohibited for sale in bulk. Only products whose packaging bears this pictogram because of the following hazard are prohibited, to be verified on the technical data sheet:

- skin corrosion, category 1 — skin corrosion/irritation, categories 1A, 1B and 1C.
Example: caustic soda and bleach containing 9.6 % active chlorine, where not sold as a disinfectant³, for example for whitening purposes, are prohibited for sale in bulk.
- Serious eye damage or eye irritation, category 1 (Pursuant to the CLP Regulation as amended in 2024).



Products bearing this hazard pictogram are not all prohibited for sale in bulk. Only products whose packaging bears this pictogram because of the following hazards are prohibited, to be verified on the technical data sheet:

- flammable gases, categories 1 and 2;
- flammable liquids, categories 1 and 2;
- flammable solids, categories 1 and 2.



Products bearing this hazard pictogram are not all prohibited for sale in bulk. Only products whose packaging bears this pictogram because of the following hazard are prohibited, to be verified on the technical data sheet:

- acute toxicity, category 4 / harmful if swallowed.
Example: sodium percarbonate, which is harmful if swallowed, is classified in this hazard category and is prohibited for sale in bulk.
- Skin sensitisation, all categories / May cause an allergic skin reaction Pursuant to the CLP Regulation as amended in 2024.
Example: detergent products whose formulation contains essential oils.

³ Please note that, if bleach is sold as a disinfectant, it must have a biocidal marketing authorisation allowing bulk sale.

5) M10 / Extract from the CLP Regulation — Provisions on bulk sale

Recital 19 of Regulation (EU) 2024/2865 of 23 October 2024

“(19) Currently, Regulation (EC) No 1272/2008 does not provide for specific rules for the labelling and packaging of substances or mixtures supplied to the general public and professional users via refill stations. In view of the growing trend to sell products, including certain chemicals such as detergents, without packaging in order to reduce waste and facilitate more sustainable forms of sale, it is appropriate to establish specific rules and conditions for such types of sale and to establish a list of hazard classes and categories for which the sale of substances or mixtures meeting the criteria for classification in those hazard classes and categories via refill stations is prohibited, in order to ensure safety and the protection of human health. Risk mitigation measures should be put in place to ensure that refill takes place safely, for example by preventing overfilling, contamination and, in particular, any uncontrolled handling of the refill station by children, as well as by avoiding any reaction between the substances or mixtures supplied via the refill station, or between those substances or mixtures and residues in the packaging to be refilled.”

Article 1(2) of the amended CLP Regulation

40) “refill” means an operation by which a consumer or a professional user fills packaging with a hazardous substance or mixture offered by a supplier in the course of a commercial activity, whether in return for payment or free of charge;

41) “refill station” means a place where a supplier offers to consumers or professional users hazardous substances or mixtures that can be acquired through refill, either manually or through automatic or semi-automatic equipment.

Please note that these definitions are those used in the PPWR.

Article 1, point 18, of Regulation (EU) 2024/2865 of 23 October 2024 amending Article 35 of the CLP Regulation

“2a. Hazardous substances or mixtures may be supplied to consumers and professional users via refill stations only where the conditions laid down in Annex II, section 3.4, are fulfilled.”

Annex II

Annex II to Regulation (EC) No 1272/2008 is amended as follows and will apply 18 months after the entry into force of the Regulation:

In Part 3, the following section is added:

“3.4. Supply via refill stations

Where hazardous substances or mixtures are supplied in accordance with Article 35(2a), the supplier shall ensure that the following conditions are fulfilled:

- a) the refill station bears labels corresponding to the labels for each hazardous substance or mixture supplied at the station;
- b) the labels of the refill station are firmly affixed horizontally in a visible place on the refill station and meet the requirements of Article 31(2), (3) and (4), *mutatis mutandis*;
- c) risk mitigation measures are applied in order to minimise exposure of humans, in particular children, and of the environment;
- d) measures are taken to prevent uncontrolled use of the refill station by children;
- e) at the time of refill, the supplier is available on site to carry out maintenance and provide immediate assistance, including in the event of an emergency;
- f) refill stations may be operated outdoors and outside business hours only if immediate assistance can be provided;

g) substances or mixtures supplied via a refill station do not react with each other in a way that may endanger customers or staff;

h) the supplier's staff is duly trained to minimise risks to the safety of consumers, professional users and themselves;

i) for each refilled packaging, the requirements for hazard communication in the form of labelling set out in Title III of this Regulation are complied with;

j) for each refilled packaging, the packaging requirements set out in Title IV of this Regulation are complied with;

k) hazardous substances or mixtures are not supplied at a refill station where they meet the criteria for classification in any of the following hazard classes or differentiations:

- acute toxicity, all categories;
- specific target organ toxicity — single exposure, all categories;
- specific target organ toxicity — repeated exposure, all categories;
- skin corrosion, category 1, all sub-categories;
- serious eye damage, category 1;
- respiratory sensitisation, all categories;
- skin sensitisation, all categories;
- aspiration hazard;
- germ cell mutagenicity, all categories;
- carcinogenicity, all categories;
- reproductive toxicity, all categories;
- flammable gases, all categories;
- flammable liquids, categories 1 and 2;
- flammable solids, all categories;
- endocrine disruption for human health, all categories;
- endocrine disruption for the environment, all categories;
- persistent, bioaccumulative and toxic;
- very persistent and very bioaccumulative;
- persistent, mobile and toxic;
- very persistent and very mobile.

By way of derogation from point (a), a single label on the refill station may be used for several substances or mixtures for which the label elements referred to in Article 17(1) are identical, provided that the label clearly indicates the name of each substance or mixture concerned."