

Subject: CESIO reaction to the European Parliament vote on the proposal for a regulation on detergents and surfactants

Brussels, 28 February 2024. Following the European Parliament's plenary vote, the European Committee of Organic Surfactants and their Intermediates (CESIO), a sector group of Cefic representing manufacturers and suppliers of surfactants in the EU, is concerned the Commission's proposal unnecessarily duplicates already existing regulatory requirements for surfactants¹.

Whilst we welcome the constructive efforts of the European Parliament to seek balanced solutions to addressing the evolution of the detergents market, **we remain extremely concerned that the Commission's original proposal unnecessarily duplicates already existing requirements for surfactants and thereby adds unnecessarily to administrative burden.**

In our view, **surfactants should have been excluded from the title and in the main part of articles of the proposal. Surfactants, as B2B chemicals, are - and should continue to be - regulated primarily through Regulation (EC) No 1907/2006 (EU REACH) and Regulation (EC) 1272/2008 (EU CLP).** The exception is for biodegradability requirements, which are already in force under the existing Regulation EU 648/2004². In fact, surfactants are raw material chemicals used in B2B transactions in the formulation of finished products and are not designated for use in isolation by consumers. Therefore, all of the necessary information to ensure safety and protection of industrial and professional workers and the environment is already implemented in standard documentation laid down by appropriate parallel legislation (SDS and label according to EU CLP, UFI number for poison centre notification).

We also have **valid technical concerns regarding the analytical methods that should be used for defining surfactants and for testing their biodegradability**³. We also stress that the biodegradability requirements for surfactants are already in force in the existing Regulation EU 648/2004 and updated Regulation (EU) No 259/2012, and the related testing methods should be clearly maintained or updated where this makes sense to avoid unnecessary duplication of tests and to reflect the latest science.

As a responsible industrial sector, CESIO and its members are committed to the safe and responsible manufacture and use of surfactants which contribute substantially to the EU economy and society as effective ingredients in a range of products, including detergents. CESIO has a half century of experience and is very involved in the science and research of surfactants at many levels. In so doing, we are proud to contribute to efforts to further develop science-based legislation which should support and not add burden to EU industries.

¹ Amending Regulation (EU) 2019/1020 and repealing Regulation (EC) No 648/2004

² Regulation EU 648/2004 and updated Regulation (EU) No 259/2012

³ CESIO's comments are outlined in more detail in our position paper (231030-CESIO position on Commission-detergents-proposal-final)

CESIO

Rue Belliard 40 b.15 B-1040 Brussels Belgium
cga@cefic.be www.cesio.eu

A sector group of Cefic 

European Chemical Industry Council - Cefic aisbl

EU Transparency Register n° 64879142323-90

