

8 December 2025

Subject: CESIO recommends Q&A on the revised detergent regulation clarifying key points

CESIO, the European Committee of Organic Surfactants and their Intermediates¹, supports the European Commission's efforts to modernise the Detergents Regulation and to introduce greater clarity in its scope of application, notably through the inclusion of a definition for "end-user surfactants." At the same time, CESIO considers that several provisions require further clarification to ensure consistent understanding and practical implementation. We therefore recommend that the Commission address the following points in a future Q&A document, as was done for Regulation 684/2004 (see [existing link here](#) and [document](#)).

The below list of topics also proposes potential solutions which we think would be in the spirit of the Regulation, and we would welcome an opportunity to discuss these issues with the authorities and all impacted stakeholders.

1. Surfactants definition

- Article 2(11) defines the term "surfactant" using several criteria that require further explanation. To quantify surface tension and verify the other points, we recommend referencing the CESIO guidelines available on our [website](#) to support a harmonised interpretation across Member States.

2. Label information for surfactants

- We suggest that the labelling requirements in ANNEX V, Part A 1., points g, h(i), h(ii) and h(iii) only apply to end-user surfactants. For B2B surfactants, which can be used in many different sectors beyond detergents, the information is either already available through the Safety Data Sheet (SDS) or Informative Sheet or could be specified if needed on the existing sheets.

For Annex V Part A 1. (g) Product suitable for detergents: The SDS or Informative Sheet already reports this information where appropriate (e.g. point 1.2 of SDS and exposure scenario). If extra assurance is desired, the compliance to the Regulation could either be added here or under point 12.2 of the SDS, next to biodegradability, or in section 15, where the following phrase could be added: "The surfactant(s) contained in this preparation complies(comply) with the

¹ [CESIO](#) (Surfactants Europe) is a sector group of Cefic, the European Chemical Industry Council



biodegradability criteria as laid down in Regulation (EC) No. on detergents. Data to support this assertion are held at the disposal of the competent authorities of the Member States and will be made available to them, at their direct request or at the request of a detergent manufacturer”.

For Annex V Part A 1. (h (i) (ii)) regarding rules on the content of the detergent or surfactant:

The concentration of the surfactant is listed or could be listed under point 3.1 or 3.2 of SDS (or in the technical specification for a not labelled surfactant).

For Annex V Part A 1. (h (iii)) regarding the listing of preservatives: Preservatives could be enclosed or in SDS point 3.2 or in technical specifications.

The addition of the above information also on the label does not improve the safe handling of B2B surfactants, but it would only increase administrative burden and confusion, because this kind of information already is or can be made available in the SDS and/or in the technical specification, and because the B2B surfactant can be used in other applications than detergents.

3. Biodegradability methods for surfactants

EU Member States agreed that the placing on the market of surfactants shall be subject to a high environmental standard, taking into consideration their ultimate biodegradability properties, through an exhaustive set of standardised test methods. If a Member State decides to allow new standards, such a measure might be regarded by some economic operators as a barrier to the free movement of goods. To avoid diverging interpretations, we support maintaining flexibility in the selection of biodegradability test methods, reflecting the wide diversity of surfactant chemistries. We therefore recommend maintaining recognition also of EN ISO 14593:1999 and ISO 10708:1997 methods, in order to ensure continuity with existing data approaches and avoid unnecessary retesting. The deletion of these two methods could otherwise create problems, especially for previous tests done according to them and could remove possibilities to test surfactants according to the most suitable method. If it is not possible to reintroduce these ISO methods, then it should at least be possible after entry into force of the new regulation - at a minimum - to use historical data from studies using these test methods.

4. Biodegradability tests

There is a need to provide clarification on the use of Read-Across, such as done under question 3.3 of the current [Commission Q&A document](#).

- The principle of “Read-Across” of data from one substance to a similar substance is already recognised in international risk assessment activities, including the OECD High Production Volume (HPV) Chemicals Programme. Several guidance documents have been developed which provide guidance on the grouping of substances and read-across (ECHA RAAF 2017; OECD 2017).

This approach allows establishing the properties of individual substances by “reading-across” from the properties of substances on either side in the same homologous series. This means the grouping of substances whose physicochemical, toxicological or eco-toxicological properties are likely to be similar or follow a regular pattern as a result of structural similarity. Therefore, these substances may be considered as a group or “category” of substances. Application of the group concept requires that physicochemical properties, human health effects and environmental effects/fate may be predicted from data for a source substance within the group by interpolation

to other substances in the group (Read-Across approach). This avoids the need to test every substance for the same end point.

The similarities may be based upon:

1. A common functional group
2. The common precursors and/or the likelihood of common breakdown products via physical and biological processes, which result in structurally similar chemicals or
3. A constant pattern in the changing of the potency of the properties across the category.

5. Use of old tests or literature data for biodegradability

Many surfactants have already been registered, so their biodegradability has already been subject to testing. We suggest that it should remain possible to use such data as well as literature data and Ecolabel DID List data for the purpose of compliance with the Detergent Regulation, as is currently possible under paragraph 30 of the existing regulation. Also, the use of scientifically reliable and robust historical data obtained for substances that have been present on the market for many years and for which safety is well known should be permitted even if the data was generated before the implementation of GLP requirements. This could avoid the unnecessary repetition of tests on substances whose results are already well known, allowing producers to concentrate on new parameters or aspects to be developed.

6. Animal Testing

Whilst we fully support the objective of eliminating the need for animal testing to ensure the safety of detergents or their ingredients, we would like to emphasize the importance of acknowledging that other legislative testing requirements may still apply to certain substances beyond those envisioned by the Detergents Regulation. Furthermore, as the Detergents Regulation empowers the Commission to derogate from a prohibition where appropriate to ensure a high level of protection of human health and the environment (under recital 15 and Article 7 of the latest available text), these procedures should be clarified to help ensure that companies can continue to meet their legal obligations in the best way.

We also express our support for action 8² and action 9³ of Cefic's 10-point action plan, which promote the adoption of reliable, animal-free safety assessment methods in chemical legislation. It remains essential to foster the continued development and practical implementation of non-animal testing and modelling approaches, particularly for complex endpoints where validated new approach methodologies (NAMs) may not yet be available or feasible.

We recommend that the following points be clearly addressed in any future Q&A:

- The animal testing ban on detergents and surfactants, as outlined in the Regulation, applies exclusively to tests conducted for the purpose of complying with this specific Regulation. Since the only testing explicitly required for surfactants under this specific Regulation is related to biodegradability and the respective testing is a non-animal approach, testing of surfactants is out of scope of the ban.

² <https://cefic.org/resources/reach-action-plan-action-8-introduce-a-new-safety-assessment-scheme-that-supports-an-increased-uptake-of-reliable-animal-free-safety-assessment-methods/>

³ <https://cefic.org/resources/reach-action-plan-action-9-smoothen-the-registration-process/>

- The Commission retains the authority to grant derogations where necessary to ensure a high level of protection for human health and the environment. Moreover, animal testing may be required under other legislative frameworks for the safety assessment of workers, consumers and the environment, provided no alternative methods are available.
- Where the Commission derogates from the detergents prohibition for the purpose of ensuring a high level of protection of human health and the environment, these procedures should be clarified to help ensure companies can continue to meet their legal obligations.
- The Commission acknowledges the need to further support the development and viability of non-animal testing and modelling approaches for phasing out animal testing in chemical safety assessment. The efforts are crucial to advancing the 3Rs principle- Refinement, Reduction, and Replacement of animal testing- through innovative New Approach Methodologies (NAMs). Additional information on these initiatives is available on the [EPAA website](#).