



Brussels, January 2024

Dear Members of the ENVI Committee:

The ongoing [revision of the Detergent Regulation](#) offers an important opportunity to improve the requirements on detergents in the European market and therefore minimise harmful effects on human health and the environment.

Unfortunately, the European Commission's proposal (April 2023) was lacking in many areas. We are encouraged that the rapporteur's draft report improves upon several important points and additional amendments have been submitted on environmental priorities. Inspiration should be drawn from the [EU Ecolabel for detergents](#). Its requirements, in place since 2017, have been taken up by many industry actors, proving that more environmentally-friendly detergents are feasible and realistic.

It should be emphasised that detergents still contain harmful substances that impact human health.¹ Recent tests have shown the presence of allergenic substances and endocrine-disrupting chemicals (EDCs)² in detergents, as well as substances with toxic effects on intestinal barrier.³ A study released in January 2024 showed two-thirds of wool detergents contain harmful chemicals, including suspected EDCs.⁴ Detergents used in

¹ [Identification of combinations of endocrine disrupting chemicals in household chemical products that require mixture toxicity testing - ScienceDirect](#)

² [Many detergents contain unwanted chemicals \(taenk.dk\)](#)

³ Ogulur I, et al. [Gut epithelial barrier damage caused by dishwasher detergents and rinse aids](#). J Allergy Clin Immunol. 2023 Feb;151(2):469-484. doi: 10.1016/j.jaci.2022.10.020.

⁴ [Unwanted chemicals in wool detergents | Forbrugerrådet Tænk \(taenk.dk\)](#)

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.^{5 6 7}

Yet it is possible to make cleaning products free of these substances, as evidenced by the above tests (showing that some detergents are on the market without these chemicals) and the success of EU Ecolabel detergents.

The current paradigm shift towards a circular economy, where consumers and industry are moving towards more energy-efficient, durable and reusable solutions, also often means an increase in activities such as cleaning and washing (scaled-up reusable packaging systems for food and non-food, for example).

As an everyday consumer and industrial product, detergents have a significant impact on the environment via water pollution. 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. An ambitious revision supports the One Health approach which recognises the interconnections between the environment and human health.

For these reasons, we, the undersigned, support the [draft report](#) by the ENVI committee and the following amendments. We urge legislators to adopt an ambitious text to improve water quality, protect human health, and decrease intentional and unintentional microplastic release.⁸ Any sustainability issues which cannot be addressed in this regulation must be tackled with mandatory requirements in the upcoming ecodesign measures for detergents to be adopted under the Ecodesign for Sustainable Products Regulation.

Key asks:

- Expand the biodegradability requirements to all detergents and surfactants.
- Reduce phosphorus usage.
- Minimise the use of hazardous substances, in line with the Chemicals Strategy for Sustainability (CSS) that identified detergents as a key product in the aim for a toxic-free environment, especially substances classified as endocrine-disruptors, skin sensitisers, and respiratory sensitisers.
- Microplastics and biodegradability concerns
- Mandatory refill stations in large retailers

Expand biodegradability requirements to all detergents and surfactants.

- ❖ Support Amendments 16-20.

⁵ N. Hadrup et al. Asthma-inducing potential of 28 substances in spray cleaning products—Assessed by quantitative structure activity relationship (QSAR) testing and literature review, *J Appl Toxicol.* 2022 Jan; 42(1): 130–153, <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9291953/pdf/JAT-42-130.pdf>

⁶ Tas T. A. et al. Occupational Contact Dermatitis in Hospital Cleaning Workers, *Dermatitis*. Dec 2021, 388-396, https://www.liebertpub.com/doi/10.1097/DER.0000000000000597?url_ver=Z39.88-2003&rft_id=ori%3Arid%3Acrossref.org&rft_dat=cr_pub++0pubmed

⁷ S. S. Alkotob et al. Advances and novel developments in environmental influences on the development of atopic diseases, *Allergy* Oct 2020, <https://onlinelibrary.wiley.com/doi/10.1111/all.14624>

⁸ Additional detail on these asks can be found in the ECOS Position Paper: [ECOS asks on detergents \(ecostandard.org\)](https://ecostandard.org)

Biodegradability requirements must not be limited to only surfactants but include all components of detergents. The requirements must also extend to anaerobic biodegradability to prevent unwanted substances entering the environment.

Reduce phosphorus usage

- ❖ Support Amendment 85, Recital 10.

Phosphates and phosphorus compounds in detergents contribute to water pollution and the eutrophication of rivers and other waterways. It is imperative to reduce the amount of these compounds at the source by decreasing the limits in detergents.

Minimise use of hazardous substances, in line with the Chemicals Strategy for Sustainability (CSS), especially endocrine-disruptors, skin sensitisers, and respiratory sensitisers

- ❖ Support Amendment 21, Article 6a

Detergents contribute to our continuous exposure to chemical mixtures in products and the environment.⁹ It is possible to develop and market detergents that do not contain these substances. Restricting chemicals that are harmful to the environment and human health will uphold the aims of the Zero Pollution Strategy and the CSS.

Microplastics and biodegradability concerns

- ❖ Modification of Amendment 193, Article 4.2b

The amendment proposes that all plastic components in the detergent must be fully biodegradable. Considering doubts about whether microplastic can be truly biodegradable (e.g. [Plastic Soup Foundation](#), [Malafeev et al. 2023](#)), the use of microplastics should instead be banned completely. [Investigations](#) by Austrian NGOs VKI and Global 2000 found that there is a trend by manufacturers to use soluble instead of solid microplastics. But there are also many detergents that do not contain any type of microplastics.

Mandatory detergent refill stations for large economic operators

- ❖ Modification of Amendment 22, Article 6b

We do not support the first paragraph which requires liquid detergents to be made available in single-use light pouches for refill at home. This is not a genuinely reusable or refillable solution and continues to create waste. Any approach to promote refillable or reusable packaging needs to be in line with the definitions set out in the Packaging and Packaging Waste Regulation - which does not foresee single-use packaging as intermediaries.

We strongly support the second paragraph, introducing mandatory detergent refill stations in large retailers (with a sales area above 400m²). 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, e.g. [Kaufland](#) in Germany, [Lidl](#) in the Netherlands, and [Carrefour](#) in Belgium. Already a decade ago, refill detergents were set up e.g. [in Italy](#), saving packaging and money for consumers.

⁹ [Chemical-cocktails_CHEMTrust-report_March-2022.pdf](#)

Thank you for considering this important file. We are available for any questions you may have.

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On behalf of the following organisations:

Arnika - Toxics and Waste Programme
CHEMTrust
Child Rights International Network (CRIN)
ECOCITY
Ecologistas en Acción
ECOS - Environmental Coalition on Standards
European Environmental Bureau
EFA - European Federation of Allergy and Airways Diseases Patients' Associations
Générations Futures
Health Care Without Harm Europe
Health and Environment Alliance (HEAL)
Hogar sin Tóxicos
ISDE, International Society of Doctors for Environment Italy
Pesticide Action Network Germany (PAN Germany)
Réseau Environnement Santé
Rethink Plastic Alliance
Zero Waste Europe (ZWE)
ZERO - Association for the Sustainability of the Earth System