

CESIO

news



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EUROPEAN COMMITTEE OF ORGANIC SURFACTANTS
AND THEIR INTERMEDIATES

SEPTEMBER
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Foreword

Dear Colleagues,

Last year has been another year of intense activity for the Secretariat starting with the advocacy work on RIP 3.3.2, the follow up to the implementation of the Detergent regulation and the initial steps for the implementation of REACH.

As we all know, the Secretariat has been short of staff for most of the year but we were delighted to announce the arrival of Kirill SKIRDA on 1st June. Kirill has been very fortunate in so far as he was able to meet most CESIO Committees and working groups within a few weeks of his arrival. Some time will be needed for him to consolidate the learnings of the first 2 months.

We hope that the CESIO team will be able to offer you the help and support needed to face all challenges ahead of Industry in the coming years beside REACH. The revision of the Detergent Regulation is certainly an area which will have to be closely monitored thanks to the good contacts CESIO has developed with the Commission. GHS will also require efforts from all.

I would like to take this opportunity to thank all the chairmen/members of CESIO committees for their help and full co-operation during the transitional period.

Ch De Cooman
Secretary General

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Update of Detergent Regulation in Regard to Biodegradability Data and Compliance with Claim in MSDS

C.-D. Hager

General

Regulation (EC) No. 648/2004 on detergents entered into force across the European Union on 8 October 2005 as described in detail in CESIO news 2005 (Issue no. 9). The implementation was facilitated by the CESIO Guidance Document which was made available only to CESIO member companies as well as by additional CESIO and A.I.S.E. guidance documents, publicly available through the official EU website. The CESIO Read Across principle was accepted by the Commission and has also been officially documented in the Tiered Approach Guidance Document and as a stand-alone “Read Across Rules” document. All these documents have been published on the EU Commission official website http://ec.europa.eu/enterprise/chemicals/legislation/detergents/index_en.htm

Request for a Derogation for Non Complying Surfactants Ends on October 07, 2007

According to the Detergent Regulation (648/2004/EEC), surfactants are only allowed for use in detergent products when they meet the criteria for ultimate aerobic biodegradation, whether by direct testing on the individual substance (mineralization), or by read across as described in the read across rules document. For surfactants that do not successfully pass one of these mineralization tests, but meet the primary biodegradability requirements (as described in Annex II of the Regulation) along with the criteria of Article 6(1), a derogation can be requested for use in Industrial & Institutional (I&I) detergent products. Such derogation can be granted on the basis of an evaluation of the environmental safety of metabolites that may be formed upon the biodegradation of the surfactant.

The derogation procedure / guideline for surfactants used in I&I applications has been approved as a Commission recommendation known as the Tiered approach guidance document which is available through the EU website. The deadline for submitting requests for derogation for non complying surfactants ends on October 07, 2007.

Communication of Compliance with the Regulation

Under the regulation, there is an obligation on surfactant manufacturers to communicate efficiently on the compliance of their surfactant products.

The European Commission, Member States and stakeholders agreed at the ad hoc EU working group meeting of Oct. 08, 2004 (Brussels) that the material safety datasheet (MSDS) is the appropriate document for a smooth and consistent application of the regulation requirements on the “information to be provided by surfactant manufacturers” (art. 9(1) and 9(2)). A CESIO guideline with the recommended sentence and translations into different languages for the MSDS has been issued and is available on the EU Commission public website. CESIO strongly recommends using these standardized declarations in the MSDS document. CESIO members (as well as all surfactant manufacturers) are legally bound to ensure that all documents on biodegradability are available to substantiate the statement of compliance of the individual surfactants with the provisions of the Detergent Regulation.

After almost two years from its entry into force, Belgium raised considerable concern at Commission level that according to their inspections “the majority of detergents companies do not comply with Article 9(2) of the Detergents Regulation. Apparently, the transmission to the national authorities of the data supporting the biodegradability of a given surfactant has not been implemented in a satisfactory way. Other Member States (Czech Republic, Slovakia and Greece) reported to the Commission in June 2007 that the process was too slow and that in several cases the data had not been provided yet.

CESIO wishes to remind all its members that both the surfactant manufacturers and the detergent manufacturers can be held individually responsible for providing data to the Competent Authorities according to the procedure developed and accepted by the Commission. DG Enterprise confirmed that detergent formulators should proactively cooperate with the CAs to pass the relevant requests to their surfactant suppliers in line with the relevant CESIO guidelines. Surfactant suppliers should in turn respond without delay.

In practice, as this system has not proven sufficiently robust so far, CESIO and A.I.S.E. are currently developing a more detailed guideline. CESIO and A.I.S.E. have formally committed to making this guideline known to all their

respective members and to making it available via public websites also to non-members surfactant manufacturers, recognizing the difficulty of doing so with the latter.

Failing to implement such guideline would lead to the Commission initiating an unwanted revision of the current guideline with a view to tightening procedures. CESIO urges all its members to behave in a responsible manner.

Anaerobic Biodegradability

CESIO, ECOSOL and ERASM had the opportunity to make a presentation at the EU Detergent Working Group meeting in November 2006 on the issue of anaerobic biodegradability. New results from additional soil ecotoxicity tests with LAS were presented showing that the PEC/PNEC ratio decreased by a factor of 7, from which a significantly lower environmental risk of LAS in anaerobic sludge could be concluded.

The key observations of the presentation were also officially documented by the Commission:

(a) The statement by SCHER that “the requirement for ready ultimate biodegradability under anaerobic conditions is not by itself considered an effective measure for environmental protection” is fully in line with the opinion of the Detergent and Surfactant Industry.

(b) Risk assessments taking the good operation of Waste Water Treatment Plants into account have unequivocally shown that the ready biodegradability of surfactants under aerobic conditions as required by Regulation (2004/648/EC) is a sufficient prerequisite for environmental protection.

(c) No correlation between (lack of) anaerobic biodegradability and environmental problems has been reported.

The Commission welcomed the presentation as a helpful and comprehensive input on the anaerobic biodegradability of surfactants and mentioned that the update of these studies will serve as an essential tool in view of the forthcoming revision of the Detergent Regulation on this issue scheduled to be completed by April 2009.

Provide More Visibility to CESIO 2008 Congress

Ch. Séné

7th World Surfactants Congress – 22-25 June 2008 – Paris

Paris will host the 7th World Surfactants Congress (CESIO 2008) which will convene at the Palais des Congrès from 22 to 25 June 2008.

Organised by the French Association for Surfactants (ASPA), on behalf of CESIO, this major event will gather colleagues, customers and business partners from all over the world to exchange their professional experiences on the Congress main theme: “Surfactants, the key to your sustainable applications”.



CESIO 2008 is organized under the auspices of Pr Jean-Marie LEHN, Chemistry Nobel Prize Laureate. Sessions, posters and the exhibition will cover the scientific, economic, technical as well as safety and regulatory aspects of surfactants and surfactant applications in industry and consumer products.

5 plenary presentations are scheduled:

Plenary 1

“Surfactants – Sustainable and Safe”
Bernard Brancq – Congress President

Plenary 2

Keynote Speech
Pr Jean-Marie Lehn – Chemistry Nobel Prize Laureate

Plenary 3

“Surfactants for the Future: From raw materials to sustainable and responsible uses”

Round table discussion with representatives from AKZO NOBEL, BASF, COGNIS, CRODA, HUNTSMAN and RHODIA

Moderator: Conny Czymoch, Journalist

Plenary 4

“Surfactants for Sustainable Consumer Application”

Charles Bragg, Global Director of Fabric Care Product Design, Procter & Gamble

Plenary 5

“Competition and Regulation – Is there room left for entrepreneurship and innovation within a strict regulatory frame (SEVESO, REACH, Biocide detergents, cosmetics...)?”
Representative from the European Commission

5 parallel sessions are scheduled:

Session A

Synthesis, Properties, Analysis

“Innovation in substances, processes, analytical procedures to get more sustainable surfactants. What’s new?”

Session B

The Market: Survey, Development and Challenges

“Sustainable, Green, Ecolabelled demand from the Market? How does it impact the raw material supply and the surfactant production, marketing and sales?”

Session C

Consumer Sustainable Use

“Consumer sustainable users: What is the trend in formulations and performances requested from the downstream users?”

Session A

Industrial & Institutional Sustainable Use

“Industrial and Institutional Sustainable uses: What are the latest needs and offers from the market?”

Session E

Safety & Regulatory Affairs

“According to REACH, safe surfactants are a must. What are the regulatory constraints and opportunities? How have the Human and Environmental safety assessments evolved since the last Congress CESIO 2004?”

Abstracts submission (for presentations or posters) is opened until 3rd October 2007 on www.CESIO2008.com.

Three different levels of sponsorship have been defined and specific sponsorship opportunities are available.

Detailed information on the Congress such as sponsorship or the reservation of booths and hospitality suites as well as “registration to the congress” and abstract submission can be obtained on www.CESIO2008.com.

To contact directly the organizer, please email: CESIO2008info@mci-group.com or any member of the organizing committee.

- Bernard BRANCQ (Chairman and Congress President) SEPPIC
- Jean-Pierre DOUCET, ASPA
- Catherine LE HEN-FERRENBACH, COGNIS
- Dominique RAIN, ASPA
- Pierre RENAUD, ASPA
- Christophe SÉNÉ (Program Committee Chairman), STEPAN EUROPE
- Claude TREZAIN, ASPA

Looking forward to seeing you in Paris in June 2008!

REACH – Grouping and Consortia Formation

D. Ross, A. Willing

The REACH Regulation (1907/2006/EC) was adopted on 18 December 2006 by the EU and entered into force on 1 June 2007.

One of the most important aspects for the surfactant industry is that polymers are currently exempted from registration. Nevertheless, polymers are not completely out of the scope of the REACH regulation as the monomers have to be registered and polymers have to be notified to the EU C&L inventory. This will require/lead to a harmonized classification, and the TRA is already active in this regard.

With regard to registration of a substance, the recommended procedure is to file a “Joint Submission”, which means that only one substance-related dossier is submitted on behalf of all registrants to the European Chemical Agency. This requires a close cooperation between companies, e.g. for data collection, testing, preparing the robust study summaries, and last but not least cost sharing. In a legal context cooperation between competitors is a quite sensitive issue. Therefore, it is necessary that the parties sign a contract (Consortium Agreement), in which the frame conditions of the cooperation are defined according to the EU competition law. APAG Fatty Nitriles Group has developed a model for Consortium Agreement which has been reviewed and approved by Cefic. TEGEWA has subsequently also developed model Consortium Agreements with REDECKER (German Law Firm). The former will be made available via CESIO extranet and the latter are available at www.t-s-n.de.

To assist its members in REACH related issues, CESIO has established in March 2007 a REACH Task Force (TF). The CESIO REACH Task Force, chaired by David Ross, Huntsman, has focused during the last quarter on progressing the industries’ approach to satisfy the requirements of the REACH legislation.

As a first step, a list of surfactant families with particular interest to CESIO companies has been collated and lead companies have been assigned. The list will be made available to the National Chemical Associations so that it can be distributed to their members. The TRA took the decision to first concentrate on the high volume (phase 1) surfactants. The TRA examined this list and looked at a number of different associations/working parties which

may have information that could be used in the REACH process. These are for instance, ECOSOL, HERA, and in particular the OECD/ICCA/SDA HPV-consortia. CESIO has sent a letter to SDA to make them aware of the REACH requirements and to ask SDA for their support to convince SDA HPV-consortium member companies to actively cooperate in CESIOs REACH activities, e.g. by providing “Letters of Access” for the robust study summaries or the underlying original test reports in their legal possession.

The next step was the formation of consortia to work together where the companies have common interest in substances. There was broad agreement between the REACH TF member companies that industry could not afford to wait for the official set-up of common REACH interests groups (the so-called SIEFs = Substance Information Exchange Forum), but that rapid progression was needed, i.e. via formation of Pre-REACH consortia. In this regard it was thought that the best route was to use the Pre-Consortium Agreement that had been developed by a small core group of APAG companies. The “APAG Pre-Consortium” agreement (which is based on the Redecker model contract) will enable competitors to exchange all information necessary (especially about the sameness of the substances) to come to the conclusion, if there is common ground for the formation of a Consortium.

The last step to which all CESIO member companies will be invited to participate will be the signing and participation in the various REACH consortia. The Consortium Agreement will define the rights and obligations of the consortium members (actual and future), and in particular the share of the financial burden are defined. It is expected that agreeing on and signing of the Consortium Agreement is a crucial step towards REACH registration. To avoid conflicts with the EU competition law and to eventually facilitate analysis, aggregation and validation of commercially sensitive data will require the use of a neutral third party. It has been agreed that in the first place CESIO staff will act as the neutral third party for the phase-1 surfactant consortia. However, it might be necessary at a later stage to involve external consultants.

ERASM Status + Achievements

K. Schwarz

ERASM, Environmental Risk Assessment and Management, the joint research platform between the detergents and surfactants industries in Europe represented by their associations A.I.S.E and CESIO was created in 1991 as a response to the ongoing risk assessment activities in Europe. ERASM initiates and co-ordinates industry activities for improving and enlarging the scientific basis for and the knowledge about the risk assessment of detergent-based surfactants in environmental compartments. Since then ERASM is a successful pioneer of a scientific based supply chain cooperation.

The activities of ERASM encompass a number of projects managed by industry experts and where appropriate in collaboration with other interested parties. The following will summarize some major activities and deliverables.

Anaerobic Biodegradation

The ERASM report from 1999 on the relevance of anaerobic biodegradation of surfactants has been updated. New scientific literature and monitoring data were evaluated and included. The overall conclusion remained the same: If a surfactant is rapidly degradable under aerobic conditions, the anaerobic biodegradation of surfactants is of minor importance. The summary of this updated ERASM report was already presented in November 2006 to the EU WG Detergents with excellent results. This new report will be published in the scientific journal TENSIDE end 2007. The report will also be printed as ERASM report.

Biotransformation

ERASM has evaluated the feasibility of *in vitro* biotransformation assays with surfactants, as a screening tool to estimate their *in vivo* bioconcentration potential. Within this project ERASM has developed *in vitro* fish liver assays which show that representative examples of key surfactants classes are being biotransformed. The experimental part are now finalised, manuscripts for submission to a scientific paper is under preparation. The results explain why bioconcentration potential of surfactants is inadequately predicted (i.e. overestimated) by log Kow-based models. These findings also demonstrate that *in vitro* assays can be used to refine bioaccumulation predictions of surfactants. This approach has potential for reapplication to other chemical classes.

Decentralized Sewage Treatment Plants (DeSeTP)

Decentralised sewage treatment plants are relevant for CEE countries and other EU member states where historically the connection to sewage treatment plants is low or treatment of sewage not very advanced. The objective of this project was to provide an overview of different types of technology and types of systems available and establish their effectiveness at removing surfactants. Based on the finalized review report it can be concluded that the importance of DeSeTP will gradually decrease due to legislative requirements of treating waste water in Europe. The available information summarized in the report suggest that current risk assessments for surfactants may also be applicable to the situation in DeSeTPs, i.e. there is no risk to be expected.

Involvement in Reach Implementation Projects

Expertise of ERASM in exposure evaluation and risk assessment flow into the development of the draft REACH Technical Guidance Document. Input includes recommendations on the exposure assessment under REACH based on ERASM findings in GREATER, or how to handle monitoring data.

Sediment Risk Assessment

This ERASM project initiated as the sediment compartment is as yet insufficiently represented within the environmental risk assessment of detergent-based surfactants. One step of this project is to perform experimental researches to get insides into key sediment characteristics and other conditions that affect the bioavailability of key surfactant classes to marine benthic organisms. These bioavailability studies are carried out at the Institute of Risk Assessment Science, University of Utrecht within an ERASM funded PhD. Interims results are already promising showing that sorption coefficients of surfactants at low field concentrations are much higher than concentration that are used in the normal toxicity studies. This means that the actual bioavailability in field sediments will be likely much lower than in laboratory sediment toxicity tests. These finding will be incorporated in the final recommendation for a sediment test methodology.

HERA

J. Rosenblom

The Human and Environmental Risk Assessment (HERA) on ingredients of household cleaning products, a unique European partnership established in 1999 between the makers of household cleaning products (A.I.S.E.) and the chemical industry (Cefic) to which CESIO made a large contribution is coming to an end.

Detailed information and reports on the HERA Risk Assessment program for surfactants is available on www.heraproject.com.

With the exception of the ongoing Risk Assessments of three surfactants still to be finalized, future activities of HERA will be focused around communication.

Completed HERA Risk Assessments on Surfactants	Date of Publication
Alcohol Ethoxysulphates	Feb. 2003 & June 2004
Alkyl Sulphate	March 2002 & Dec. 2002
Cocamidopropyl Betaine	July 2005 (Human Health section only)
Hydrotropes	Sept. 2005
Linear Alkylbenzene Sulphonate (LAS)	May 2004
Secondary Alkane Sulfonate (SAS)	Apr. 2005
Alcohol Ethoxylates	Aug. 2007
Pending HERA Risk Assessments	Projected Date of Publication
Amine Oxides	End 2007 – early 2008
Cocamidopropyl Betaine	End 2008 – 2009
Ester Quats	During 2008

CESIO Analytical Task Force and CEN Standardization

Ch. Séné

The “CESIO Analytical Task Force” gather analytical experts who initiate standardization at CEN (European Committee for Standardization).

It is important to note that while harmonization of analytical methodology is important for industry, CEN standardization is not always required. Thus, the CESIO Analytical Task Force can run harmonization programme (e.g. round robin testing...) without seeking CEN standardization which is the “royal” route but a consuming exercise since the process is strictly defined by CEN rules. The working of CEN/TC 276 is reviewed by CESIO TRA.

The Secretariat of CEN/TC276 is currently with AFNOR (France). Christophe Séné has been formally appointed Chairman of CEN/TC 276. CEN/TC276 is made of two Working Groups: WG 1 “Analysis” (Convener: Reinhard Gerhards (Degussa) replacing C. Padros (Kao), in Q2-2007) and WG 2 “Test method” (Convener: Rainer Traber (Ciba specialty Chemicals)).

The “CESIO Analytical Task Force” is currently assessing the requirements in term of analytical methodology for the implementation of REACH and the RIPs (e.g. RIP 3.10) which could help Industry define and characterize substances and build risk assessment dossier in a harmonized way.

The task of the Working Groups is the development of methods for testing the properties of surface active agents in relation to their areas of use. The aim and activity are to harmonize the various methods of test of the member companies with the strong intent to convert the evaluated methods in CEN standards.

In the last 3 years the following standards have been published by CEN/TC 276 WG2:

EN 14370:2004

“Surface active agents – Determination of surface tension”

EN 14371:2004

“Surface active agents – Determination of foamability and degree of foamability – Circulation test method”

Ecolabelling

Ch. Séné

EN 14712:2005

“Surface active agents – Determination of physical stability in alkaline and acid solutions”

EN 1890:2006

“Surface active agents – Determination of cloud point of non-ionic surface active agents obtained by condensation of ethylene oxide”

Current working items are the transfer of the BASF method for the oil removal from hard surfaces in a CEN-norm, to compare contact angles of surfactant solutions measured in different laboratories under the same conditions and to compare the dynamic behavior of surfactants using bubble pressure apparatuses from different manufacturer.

Three enquiries are being processed:

prEN 15647

“Determination of the dispersing effect of surfactants on powder”

prEN ISO 2870 rev

“Detergents – Determination of anionic-active matter hydrolyzable and non-hydrolyzable under acid conditions”

EN ISO 8799:1995/prA1

“Sulfated ethoxylated alcohols and alkylphenols – Determination of content of unsulfated matter”

2007 is a year of thought and consultation on EU Ecolabel for the European Commission. Weakened by poor market penetration and by the difficulty in defining criteria accepted by all stakeholders, the European Commission, who owns the EU Ecolabel, has decided to make an overall revision of the scheme.

The Revision covers the following fields: the ambition of the scheme, the organization of the EU Ecolabel committees, the fee structure, the criteria development, the involvement of stakeholders and boosting measures (fiscal measures, green procurement...).

In March 2007, CESIO and ECOSOL submitted a joint opinion on the EU internet consultation. We ask (i) for consistency and rigorousness of the criteria which should be based on scientific considerations only, (ii) for the use of the Precautionary Principle according to its strict definition, (iii) for pragmatism in setting up the criteria which should not be too elitist and (iv) adequate consideration for industry engagement. At the date of printing (August 2007), the Commission has not issued a consolidated report on the internet consultation.

The periodic review of the existing EU Ecolabel scheme has been suspended awaiting the Revision of the EU Ecolabel Scheme.

The “EU Ecolabel on Soaps, Shampoos and Hair Conditioners”, aka the cosmetic Ecolabel, has been officially published by the Commission as a Commission Decision 2007/506/EC.

For surfactants, there are two specific criteria: (i) the ultimate aerobic biodegradation limit of 60% (same as Detergent Regulation) and (ii) the requirement on anaerobic biodegradation.

CESIO Surfactants' Statistics C.-D. Hager

The anaerobic biodegradation criterion is different and better compared to the other EU Ecolabels for 2 reasons:

(a) the legal text fixes a concentration limit (e.g. up to 2.5% of non-anaerobic biodegradable surfactants in shampoos is acceptable) whereas in the other EU Ecolabel there is no tolerance of any amount of non-anaerobic biodegradable surfactants.

(b) the criterion is not discriminatory against surfactants since this rule applies to all ingredients, not only to surfactants.

Test OECD 311 has been incorporated as a possible test for anaerobic biodegradation despite the fact that it is validated for such scope.

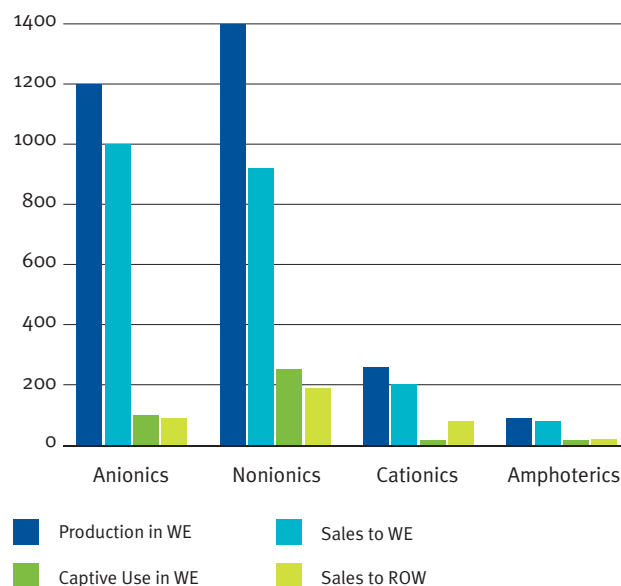
A new DID list has been published in January 2007 (Available on: http://ec.europa.eu/environment/ecolabel/product/pg_did_list_en.htm). This DID list is a consolidated version of the Nordic Swan list and the EU Ecolabel list.

Over the course of the years the CESIO surfactants statistical survey have made considerable progress. For the calendar year 2006, 29 Western European companies, representing more than 90% of the European surfactants market, have submitted confidentially their data to the Cefic statistics department. The aggregated data show now a good, reliable summary on the European surfactants market.

A very brief summary of the surfactants statistics is shown below. The much more detailed summary containing the breakdown by surfactants groups will only be made available to those companies which have actively contributed to the survey.

The data below cover the period 2006 and reflect volume expressed as 100% active substances.

Surfactants 2006: 2.99 mio tons



US-trends on Detergent Regulation and Surfactants

P. De Leo

Phase-out of Phosphate in Auto-dish Detergents

Facing a trend of state bans of phosphate in automatic dishwashing detergent (ADDs), The Soap and Detergent Association (SDA) has been working to pass model legislation in traditionally activist states which would ban phosphates in consumer ADDs, but the ban would not occur for three years and it would protect the Institutional and Industrial (I&I) ADD marketplace from state-level phosphate bans. SDA seeks no more than 0.5% phosphorus in household ADDs, effective no sooner than July 1, 2010. Bills adopting SDA's approach were signed into law in Vermont and Minnesota and sent to the Governor of Illinois for signature. No opposition is foreseen in Michigan and Massachusetts. New initiatives have been undertaken in Pennsylvania and Ohio. The only disappointment has been in Maryland, where SDA preserved the commercial ADD exemption, achieved the 0.5% limit in household products, but was given an effective date of January 1, 2010 instead of July 1. Next year, SDA will attempt to amend that law to the July date.

HPV Chemicals Update

The CESIO/SDA Alkyl Sulfates Consortium will be taking their completed Screening Information Data Set (SIDS) Dossier to the OECD SIDS Initial.

Assessment Meeting (SIAM) in Helsinki in October 2007. The sponsor country for the submission is Germany. The SIDS dossier covers 21 sponsored chemicals and over 30 supporting chemicals in the category.

ERASM

SDA is an active participant in the ERASM Alcohol Sourcing project. The objective of the project is to determine the contributions of free alcohols in the environment between naturally occurring sources and synthetic sources. Dr. Stephen Mudge of the University of Wales-Bangor is using isotopic methods to conduct that analysis. Dr. Mudge completed the first phase in the project during the summer of 2007 and is currently evaluating his data; he was testing his newly developed methods on a range of natural (food, plant matter, soil, and plant-based surfactants) and synthetic(surfactants) alcohol-containing source materials.

Biofuels Subsidies

In defense of its members producing and using oleochemicals, SDA is actively engaged in the debate over biofuel subsidies in the U.S. Congress.

Specifically, a recent Internal Revenue Service ruling allows oil companies to receive a dollar per gallon credit for mixing animal fats or seed oils with crude oil during the refining process. The subsidies, which are redirecting tallow away from oleochemicals to other uses – principally fuel and animal feed – are pushing up tallow prices and even pose threats to tallow availability. SDA commissioned a significant study of the impact of the subsidies on the tallow market and its long-term implications for domestic oleochemical production. In cooperation with National Biodiesel Board, SDA has been working with Congress to have the subsidy repealed through language included in the “Renewable Energy and Conservation Tax Act of 2007.”

Classification and Labelling Reminder

C.-D. Hager

CESIO Recommendations for Classification & Labelling

In 1984/85, CESIO published the first recommendations on the classification and labelling of surfactants based on mammalian toxicity. In 1992, and later again in 2000 these recommendations were revised because additional data had been obtained.

In order to develop recommendations for the classification and labelling of surfactants according to environmental requirements (“Dangerous for the Environment”), members of A.I.S.E. and CESIO created a joint task force to collate available data and to construct a database for the major volume surfactants and important substances of lower volumes. These recommendations were distributed to CESIO members in 1994 and updated in 2003 again. Both recommendations are available through the CESIO website.

After now several years from those publications it turned out that some member companies still have problems with the implementation of these recommendations as their own data, which they like to show in their safety data sheets, may sometimes lead to another classification & labelling as proposed by CESIO. To have a more transparent communication to downstream users CESIO recommends putting under section 15 in the MSDS additionally the following phrase:

“This classification is based on the current CESIO recommendation. It may deviate from a possible classification deriving solely from the data of the toxicology and ecology sections.” For conveniences this phrase is available from CESIO in nearly all EU languages.

Beginning of this year the Japanese government published recommendations for the classification of C12-C15 alcohol ethoxylates under GHS. The Japanese GHS proposals have classified the alcohol ethoxylates as a cat 2 skin irritant and a cat 4 acute toxicity as well as cat 3 (narcotic) to specific target organ system toxicity. The Japanese proposal for environmental toxicity is cat 1 for acute and chronic environmental toxicity. As these Japanese proposals for C&L under GHS are in most cases significantly different and severe to CESIO recommendations, CESIO submitted a scientifically sound position paper to JSDA with the request to discuss it with the Japanese authorities. Likely, CESIO may not be able to convince the Japanese authorities to change their classification, but as the classification published by the Japanese authorities is not mandatory, CESIO might well convince the Japanese Industry to use a classification that is consistent with the EU approach.



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Cefic, the European Chemical Industry Council, is the Brussels-based organisation representing national chemical federations and chemical companies of Europe. All together, Cefic represents, directly or indirectly, about 30,000 large, medium and small chemical companies in Europe, which employ about 2 million people and account for more than 30% of world chemicals production.

CESIO (Comité Européen des Agents de Surface et de leurs Intermédiaires Organiques) is the Cefic sector group representing the European producers of surfactants. The aim of CESIO is to develop and promote surfactants, keeping in mind environment and health.