

Subject: Reaction to Council General Approach for a Regulation on detergents and surfactants, asking for technical clarity on surfactants

Brussels, 21 June 2024. Following the Council's adoption of the General Approach for a regulation on detergents and surfactants on 14 June 2024, CESIO, a sector group of Cefic representing manufacturers and suppliers of surfactants in the EU, would like to highlight the urgent need for technical clarifications to ensure that the regulation of surfactants that are used in detergents remains fit for purpose and delivers the intended results.

Surfactants are raw material chemicals used in B2B transactions in the formulation of finished products, including but not limited to detergents. They are typically not intended for standalone consumer use and are used in many non-detergent products ranging from construction and cosmetics to printing inks and adhesives, to name a few. The references to "surfactants and surfactants in detergents" only add confusion and uncertainty as to the scope of this legislation. Our understanding is that this regulation refers to surfactants used in detergents.

Biodegradability and information requirements have already existed for surfactants used in detergents since entry into force of the existing Regulation EU 648/2004. In addition, surfactants are already well regulated within EU REACH and EU CLP. Consequently, additional information on "surfactants" requested by the proposal, should be limited to "surfactants used in detergents sold directly to consumers".

Moreover, the reference testing methods for market surveillance should be reviewed to reflect the latest science, and it is essential to reinstall paragraph 30 of the current detergent regulation EC 648/2004, which allows to waive additional biodegradability tests on surfactants when previous reliable and scientifically robust studies are available. This will help to avoid the unnecessary duplication of tests that otherwise would be conducted without any benefit (please see [CESIO detailed position](#) for more detailed comments on this topic and other technical comments).

Conclusion

CESIO remains deeply concerned that the current EU proposal for a regulation on detergents and surfactants adds uncertainty to the regulatory landscape for surfactants with no assessment of impact and unnecessarily duplicates already existing regulatory requirements for surfactants that are used in detergents. We therefore highlight the need to clarify the scope of any new measures and to provide further technical clarifications that will help to avoid regulatory uncertainty and any unnecessary duplication of measures. We remain committed to supporting the further evolution of the regulation in line with the latest scientific developments. We stress that the development of science-based legislation should support and not add burden to EU industries. We therefore call on the EU institutions to further develop fit for purpose legislation focused on the original aims of the revision.

