From: [redacted]CAB-SINKEVICIUS]
Sent: 27 October 2020 18:31
To: CAB SINKEVICIUS ARCHIVES
Subject: FW: Thank you meeting Unilever
Attachments: Unilever Position Chemicals Strategy for Sustainability September 2020.pdf; Unilever Position Circular Economy July 2020.pdf; CCF02102020_00004.pdf; CCF02102020_00003.pdf; CCF02102020_00002.pdf

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From: [redacted](CAB-SINKEVICIUS) <[redacted]@ec.europa.eu>
Sent: Tuesday, October 27, 2020 6:30 PM
To: [redacted]CAB-SINKEVICIUS) <[redacted]@ec.europa.eu>
Subject: FW: Thank you meeting Unilever

From: [redacted] <[redacted]@unilever.com>
Sent: Tuesday, October 27, 2020 6:10 PM
To: [redacted](CAB-SINKEVICIUS) <[redacted]europa.eu>; [redacted]
(CAB-SINKEVICIUS) [redacted].europa.eu>
Cc: [redacted]CAB-SINKEVICIUS) [redacted]@ec.europa.eu>
Subject: Thank you meeting Unilever

Dear Ms [redacted]

I hope you are doing well.
Thank you very much for the call with us to discuss our chemicals and plastics position.
My apologies for not having sent the attached docs earlier to you, but please find enclosed our position on the circular economy and chemicals.
I have also attached a few examples of detergent bottles that demonstrate duplication of labelling requirements.
If you have any questions please do not hesitate to contact us.

I am happy to follow up in more detail on the topics we have discussed.

I just have one question: I do not have the full details of your other colleague who joined the call and who was interested in a follow up call with Florian regarding carbon capture. If you could send me his details, I would appreciate it very much. Thank you.

Have a lovely evening.

Kind regards,
[redacted]

Unilever Position on Accelerating the Transition towards a Circular Economy

Unilever's vision is a waste-free world; a world where every material has a value, and where no packaging ever enters the environment. We believe plastic has its place, but not in our streets, rivers or oceans. We are committed to taking responsibility for the plastic that we use and to play our part in creating a truly circular economy. Our thinking and future innovation is focussed on No, Less and Better Plastic. *No Plastic* means looking for viable alternative materials, so we move away from plastic. *Less Plastic* entails designing our packaging, so we use less plastic in the first place or design for reuse through concentration or dispensing alternatives. *Better Plastic* means using plastic that has the best chance of being recycled and using that recycled material again & again & again to create a fully circular model.

Our commitments for the next 5 years:

- 100% Recyclability/Reusability packaging
- 25% uptake of recycled plastics in our packaging
- **Halve our use of virgin plastic by eliminating over 100,000 tonnes of plastic from our packaging** through switching to more sustainable alternatives, multiple-use packs and reusable, refillable, and naked product innovation. The rest will be delivered by increasing our use of recycled material, helping to keep plastic in the economy and out of the environment
- **Help collect and process more plastic packaging than we sell** through investing and partnering to improve waste management infrastructure

Our Ambition for Europe

We are very pleased to see that, with the ***Green Deal***, the European Commission (EC) has set a very ambitious agenda to put the EU on the right track to a sustainable future. In particular, the upcoming initiatives foreseen under the ***Circular Economy Action Plan (CEAP)*** to boost reuse and recycling will provide more sustainable solutions for our packaging. We also appreciate the efforts of the EC to increase the uptake of recycled plastics by setting up the ***Circular Plastic Alliance*** and to place a mandatory uptake of 25% recycled plastics in beverage bottles through the ***single-use plastic Directive***[1].

However, we still face obstacles to become fully circular. For example, there is a supply shortage of high-quality recycled plastics in Europe which means companies like us need to source recycled secondary materials from outside the continent. We are convinced that the EU can become the standard bearer in driving a circular economy that is restorative and regenerative by design, but certain unlocks are urgently needed so we can jointly achieve this objective.

[1] Directive (EU) 2019/904 on the reduction of the impact of certain plastic products on the environment https://eur-lex.europa.eu/eli/dir/2019/904/oj

1. INNOVATE - Accelerate the authorisation of recycled plastic for food contact use – amount & types of plastic

- We would encourage the EC to quickly complete the **formal authorisation of rPET mechanical recycling processes** and extend authorisation to mechanical recycling processes for rPE and rPP as soon as possible, building on experience from other regions which allow these processes. As helpfully highlighted in *CEAP,* the EC is committed to establishing rules for the safe recycling of plastic materials beyond PET into food contact materials. This process needs to be done urgently as industry is still awaiting the publication of the European Food Safety Authority (EFSA)'s list of approved PET recycling processes for food packaging. We also encourage the EC to review the safety assessment criteria of EFSA versus those in other countries, such as the USA, with the objective to speed up routes to have physical recycled PP & PE approved for food use, as well as innovative circular PET. This will not only provide clarity of the materials permitted for use but also ensure business continuity. EC authorisation would also **prevent a patchwork of local rules and enforcement regimes** which place extra burden and regulatory uncertainty for businesses.[2]
- We would also encourage the EC to recognise the output from enhanced recycling technologies as a valid source of recycled plastic. **Clarification that enhanced (chemically) recycled plastics are "recycled materials"** would allow more polymer types to be recycled and drive quality improvement from a plastic material stream which is currently lowered to only energy recovery. Innovative recycling does not compete with mechanical recycling, it moves plastic from incineration to upcycling.[3] We are already working with different partners to support new technologies to increase the supply of high quality recyclates:
    - Cooperation with scale-up company Ioniqa to ensure difficult to recycle (e.g. coloured) PET waste can be infinitively recycled[4]
    - Cooperation with SABIC to ensure plastic waste that cannot be easily mechanically recycled is converted back to its starting chemicals, further purified and then re-used[5].

  To ensure a circularity of all plastic packaging and **to bring these technologies at scale we need the EC to recognise these technologies as a source of recycled plastic**.

2. SUPPLY - Increase the collection of all types of household plastic waste and introduce measures to support better sorting and drive quality

- **Collect all household plastic waste and invest in future-fit sorting technologies/recycling capacities**. The *EU Packaging and Packaging Waste Directive (PPWD)*[6] sets mandatory plastic collection and recycling targets for member states (50% by 2025, 55% by 2030). These targets alone will not be sufficient to supply the volumes of high-quality recycled plastics required in Europe. More ambition and higher targets for quality recycling are needed to ensure a true circularity of all plastic packaging and to create high quality circular mono streams (vs downcycling or waste to energy use). CEAP recognises this issue and helpfully foresees a

[2] For example, Italy maintains a limit of 50% recycled PET for food packaging while we could go beyond.
[3] Plastics which cannot be recycled mechanically are currently incinerated - with energy recovery - due to required clear mono-streams for mechanical recycling.
[4] https://www.unilever.com/news/press-releases/2018/unilever-to-pioneer-breakthrough-food-packaging-technology-together-with-ioniqa-and-indorama-ventures.html
[5] https://www.sabic.com/en/news/21549-sabic-delivers-dynamic-showcase-of-pioneering-sustainability-solutions-at-k-2019
[6] Directive 94/62/EC on Packaging and Packaging Waste (amended in 2018) https://eur-lex.europa.eu/legal-content/EN/TXT/?toc=OJ%3AL%3A2018%3A150%3ATOC&uri=uriserv%3AOJ.L_.2018.150.01.0141.01.ENG

harmonisation of national collections systems, the development of solutions for high-quality sorting, the removal of contaminants from waste and the introduction of quality standards.

However, **without proper collection, sorting and ambitious recycling targets for high-quality recycled plastics at member-state level, there will simply not be sufficient supply for high-quality recycled plastics.** We have been working for many years to reduce the complexity of our packaging and cooperate with different partners in the value chain to ensure our packaging is designed to be recycled, to ensure better sorting and increased recycling by being involved in the development of new sorting technologies and innovative recycling methods. Increased collection and investments in advanced and future-fit sorting technologies will ensure that valuable materials are sorted from waste streams and will prevent the incineration of material streams polluted by poor technologies used currently at sorting and recyclers level.

Therefore:

- The EU should adopt **high-quality plastic recycling targets** to ensure increased supply of high-quality recycled plastics in Europe.
- MS should be encouraged to collect all plastic waste and help waste management companies, sorters and recyclers to switch to innovative sorting technologies to ensure proper polymer separation and to help increase the supply of high-quality recycled plastics.
- The EU should help to **harmonise packaging design standards**. This will help create a consistent input material for recycling processes which will reduce contamination and improve quality of plastic packaging put on the market. The ongoing work by the Circular Plastics Alliance on design for recyclability should be taken into account. Also, an **EU definition on "recyclability"** is needed to ensure a common approach by the MS.
- **Improve the quality of sorted waste by introducing quality standards or End of Waste criteria.** The EU should establish quality standards for each step of the plastics value chain for sorting and recycling consisting of several levels. Clear quality standards will provide strong incentives and clarity to develop a market where recycled plastic is used in a range of high value applications, such as textiles and packaging for household and up to food grade packaging. Currently, there are no quality standards in place for recycled plastics and there is no clarity on the required level of quality for the different product categories. As a result, various quality levels are unavailable and high-quality food grade material is used for low grade applications.
- MS should ensure Extended Producer Responsibility (EPR) Packaging fees are set aside for packaging waste management infrastructure improvements and a portion of the fees should be redeployed to increase collection, sorting and recycling of packaging which is difficult to recycle today. This will ensure there is continuous improvement in EPR systems and future-fit infrastructure so the scope and quality of what is being collected and recycled, particularly for plastic, can increase.

3. INVEST - Incentive closed loop* recycling over energy from waste and landfill

- **Focus on the right circular investment incentives to enlarge the offer of high-quality recycled plastics**. High quality grades, both for food and non-food applications, are

short in supply, quality is volatile, and prices of recycled plastics compared to virgin are very high (on average an oncost of 15 %). Moreover, sufficient supply and competitive pricing is essential for Europe to compete with other markets like the US, China and Japan where the use of advanced sorting technologies means higher volumes of recycled plastics are available. *CEAP* helpfully foresees incentives of waste recycling via EPR schemes and a revision of the *EU Waste Shipment Regulation*[7] to prevent waste being shipped to other parts of the world instead of being recycled in Europe. However further unlocks are needed:

- **Use all revenues collected via fees paid for plastic packaging to create the right circular investments** including future-fit technology & infrastructure, to ensure there is sufficient (quality) supply that will keep plastic in the loop. It is also essential, that in these difficult times MS continue to focus on green growth and investments when they try to recover their economies from the Covid-19 crisis. Although, EPR is the most efficient and effective instrument to incentive circular packaging, we see more and more taxation being proposed on plastics but without being conditionalised. To accelerate the transition to a true circular economy, investments are needed and the revenues collected via taxation, EPR, or via any other instrument penalising the usage of plastics should be reinvested in tools that keep plastics in the loop.
- **Stop using waste for other purposes than recycling.** Investments for both waste management companies and recyclers should be focused on upcycling only vs downcycling plastic waste through subsidies that encourage waste to energy (incineration) modules.
- **Stop burning plastic to achieve renewable energy targets.** The ***EU Renewable Energy Directive*** allows member-states to count so-called "recycled carbon fuels" made from non-recyclable plastic towards their national renewable energy targets for transport fuel. This can incentivise recyclers to privilege energy recovery over using the material to make new plastics.[8]

4. REINVENT - Further policy needs beyond plastic recycling to boost innovative business models:

- **Support reusable and refillable packaging options** through standards and incentives for innovative business models. This includes in-store refill stations, at home 'refill' by collection and delivery, concentrated products that can be diluted at home within a refillable bottle.
- **Support for digitalised consumer information.** To help companies to shift from single to multiple-use packaging or to get rid of packaging completely ("naked"), we need flexibility on providing consumers with the required information. With packaging becoming smaller, so does the available room for physical labelling. Businesses need flexibility on providing consumers with the required information. Access to the most recent and updated information is available at any time digitally, while such information can also be provided on a leaflet at point-of-sale or through in-store scanners in cooperation with retailers for consumers who need it.

[7] Regulation (EC) No 1013/2006 on shipments of waste https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A32006R1013

[8] As an alternative, the EC could limit the amount of recycled carbon fuels to only non-recyclable plastics that can be counted towards the 14% renewable energy target in the transport sector by 2030. The EC could also include biofuel subsidies for innovative recycling of plastic which is currently difficult to recycle.

Unilever's position on Chemistry for a Sustainable Future

For generations, the home, beauty and personal care industry have been helping people take care of their body, health, home and clothes, as well as improving quality of life. Most recently, household disinfectants, cleaning, soap and hand hygiene products have been the first line of defence to protect the EU population from COVID-19. Although the chemicals used as either active ingredients in these products, or as an integral part of the packaging deliver vitally important benefits, their use cannot be at the expense of people or environmental health.

Most chemicals – including those we use - are produced and used in a linear way. They are mostly produced from fossil fuels which are finite resources. They contribute to climate change through the release of CO2 during manufacturing and at the end of their lifecycle. Moreover, a number of chemicals intended to go down the drain are slow to completely biodegrade.

Pivoting to a new low-carbon, circular economy (zero carbon,regenerative) is the way forward to thrive within the limits of the planet. As a company, we are committed to using our technology and scale to drive this agenda. Last year, we set ourselves the ambition to halve our use of virgin plastic and help collect and process more plastic packaging than we sell. In June, we committed to achieving Net Zero emissions from all our products by 2039 and set ourselves the ambition to communicate the carbon footprint of every product we sell. To accelerate action, Unilever's brands will collectively invest €1 billion in a new dedicated Climate & Nature Fund. Moreover, we aim to make all our product formulations biodegradable by 2030.

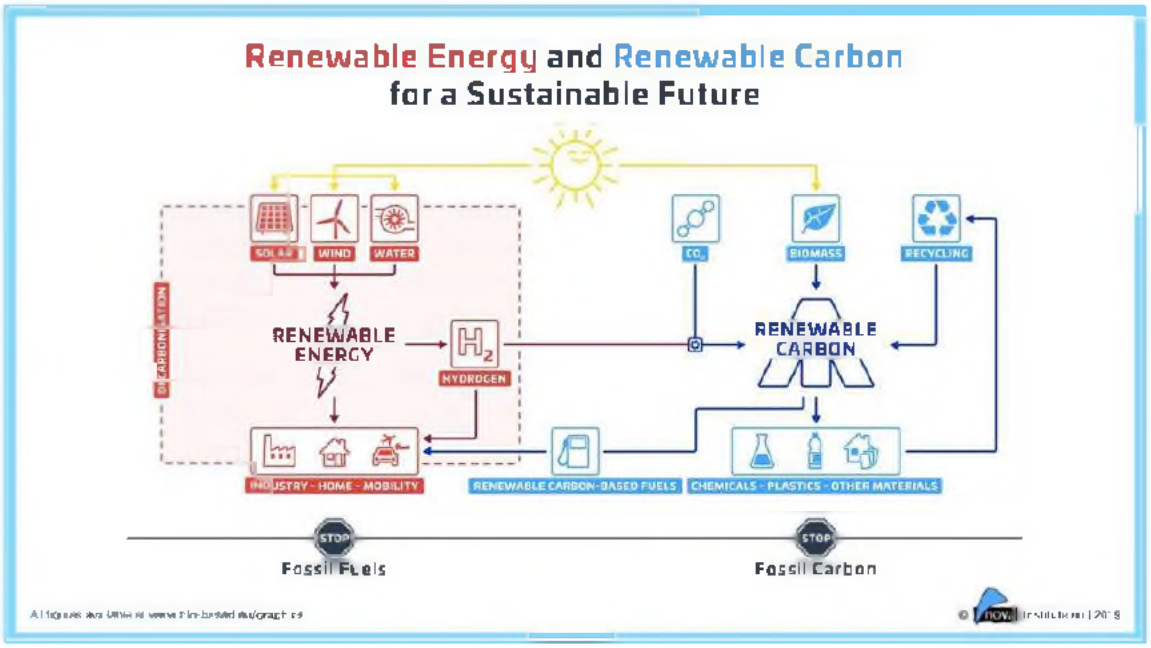
To accelerate the transition towards a low carbon, circular economy for chemicals, the EU policy framework needs to evolve.

Renewable Carbon

No single carbon source could provide a sustainable solution in the short and medium term, we believe that the production of chemicals in formulation should rely on a variety of sources which are non-fossil fuel derived or non-directly fossil fuel derived, with an appropriate life-cycle based assessment underpinning and guiding the selection of sources and robust sustainable sourcing policies for all sources of carbon.

- **In the medium to long term: capturing carbon chains in the environment** either through biomass (land or marine based, ideally from biowaste) OR industrial air capture.
- **In the short term: Agricultural byproducts or chemical recycling of non-recycled plastic into ingredients.**

As in the case of the circular economy of plastic packaging, the circularity of chemicals must rely on renewable energy. The following diagram recaps how a circular economy for chemicals used in ingredients could be structured:



In order to accelerate the renewability and circularity of chemical feedstock, we call the EC to:

For all sources of carbon:

- **Support a public-private investment effort for R&D of technologies** that allow for circular use of chemicals.
- **Support to the advancement of catalytic approaches** such as pyrolysis used in plastic chemical recycling or for conversion of CO2/CO/CH4, etc. into useful chemicals.
- **Support the development of weight-efficient chemistry/concentration.**

For carbon from industrial air capture:

- **Support the fast development of clean hydrogen**, in particular, ensuring that clean hydrogen is among the strategic industries benefiting from the new **IPCEI** (Important Projects of Common European Interest) status.
- **Price carbon emissions** so that it deters their production in the first place. If emitted anyway, price should induce emitters to reuse it as a resource, wherever fossil replacement technologies are becoming available.
- **Address all sources of carbon in a comprehensive manner, via the Emissions Trading System (ETS) or other instruments, accounting for sector specific situations.** Carbon utilisation activities should receive a fair recognition (no double counting, no double penalty), in as much as they lead to a net reduction of emissions.
- **Develop harmonised LCA guidelines to evaluate the environmental impact of Carbon Capture & Utilisation (CCU) projects.**
- **Implement the revised Renewable Energy Directive (RED II),** which includes mandatory targets for CO2-based fuels, via a rapid and fair adoption of the required Delegated Acts. CO2-based fuels are feedstocks of numerous chemical processes.

For carbon from plastic chemical recycling[1]:

- **Ensuring output from innovative recycling technologies, like chemical recycling, is classified as recycled plastics and that it is recognised across pieces of EU legislation,** notably End of Waste legislation, the Waste Framework Directive and REACH.
- **Support the development, in collaboration with the value-chain, of a transparent and auditable mass-balanced system to ensure confidence in the allocation and claims related to the chemically recycled output.**

For carbon from plants and plant-based waste / biomass:

- **Prioritise biotechnology and green chemistry** amongst the Key Enabling Technologies for the future in the EU Industrial Policy Strategy: a vision for 2030.
- **Develop and support a new industrial biotechnology and green chemistry strategy** to make the EU industry a world leader in cutting edge, coherent and integrated innovation to create new jobs in modern bioindustries through technological progress.
- **Support the research and development of industrial biotechnology processes from third generation biomass** (such as from agricultural waste, algae, etc.).
- **Create a supportive framework for the adoption of regenerative agriculture practices by EU farmers.**
- **Create the conditions for a progressive EU innovation ecosystem**, addressing full value chain creation, ranging from fundamental discovery and to business creation right through to the consumer.

Clean Energy

The amount of available renewable energy is increasing, and the costs are falling rapidly, but still much of the world's infrastructure remains reliant on fossil fuels. Accenture estimates that fuelling the loops of a circular chemical industry (including also chemicals used in plastics) will require a net amount of 21 Mtoe of additional energy on top what it already uses. Obviously, this energy needs to come from clean sources.

The Clean Energy for European Package adopted in 2019 is of high significance to the EC's Chemical Strategy for Sustainability. A policy environment that supports chemical producers to achieve carbon neutrality in their operations, is critical to a transition to sustainable circulation of chemicals and ingredients. To achieve this, the **EU should support the development of a thriving renewable energy market in Europe as part of its green recovery package**.

Therefore, we call for the EC to:

- **Unlock investment in clean technologies and value chains** and develop the plans to help support direct corporate sourcing of renewables.
- **Uphold its ambitious, binding target of 32% for renewable energy sources** in the EU's energy mix by 2030
- **Establish a modern design for the EU electricity market,** more flexible, more market-oriented and better placed to integrate a greater share of renewables.
- **Remove perverse incentives that prevent carbon from being valued such as fossil fuel subsidies.**

[1] Chemical recycling is the reprocessing, into a product, a component incorporated into a product, or a secondary (recycled) raw material but excluding energy recovery and the use of the product as a fuel. It does not compete with mechanical recycling; it moves plastic from incineration to upcycling.

- **Introduce carbon price consistent with achieving the Paris temperature target** i.e. at least US$40–80/tCO2 by 2020 and US$50–100/tCO2 by 2030, in whichever form (actual tax or market mechanism).

Biodegradability of chemical ingredients

Before Unilever launches any product, our team of scientists at our Safety and Environmental Assurance Centre (SEAC) carefully assesses each product to ensure they are safe for consumers, our workers and the environment. These risk and impact assessments take into account the product's technology and ingredients, including how the product is used and disposed. When we design our products, we aim to use as many biodegradable ingredients as possible - ones that break down quickly, easily and naturally once they have been disposed down the drain. Conversely to plastic, carbon-based molecules in formulations are disposed in water systems or directly into the environment and offer too little opportunity to be captured through collection. Therefore, they should return to the biosphere, degrading completely into simple molecules i.e. CO2 and water.

We aim to make our product formulations biodegradable by 2030 to minimise their impact on water and the aquatic ecosystems [2]. Although some of the ingredients that we currently use have no viable biodegradable alternatives, we will work with partners to drive innovation and find solutions to help us reach our ambition.

- **We call on the European Commission (EC) to accept ultimate biodegradability as an important contribution to circularity.** Ultimate biodegradability of ingredients that are renewably sourced that end up down the drain is a key factor for their circularity, as this will ensure the safe re-entry and uptake of these in the biosphere.
- **We call for legislation, via REACH, for chemicals that present harmonised biodegradation requirements to express ultimate biodegradability (either readily or inherently) and that considers appropriate testing conditions for polymeric substances/materials.**

Trust and Transparency

Consumers are actively looking for more information about the ingredients used in products, where they are sourced from and how ethical/sustainable the product is. At the same time, there is increasingly less space to communicate this information on-pack as we are seeking to reduce our plastic packaging footprint through product concentration, mainstream the use of refillable formats, and create "naked products" (i.e. without packaging). **Digitalisation provides consumers with the opportunity to access relevant product information when label space is limited or even absent.** In particular, an approach is needed to address the rise in product rating apps and the potential for these platforms to share inconsistent or inaccurate ingredient data.

[2] All the ingredients in the formulations reported as ultimately biodegradable are validated by technical international standards (OECD Guideline for the Testing of Chemicals) for determining biodegradability. This classifies them as ingredients that biodegrade completely and timely in the aquatic environment and do not leave any organic residues.

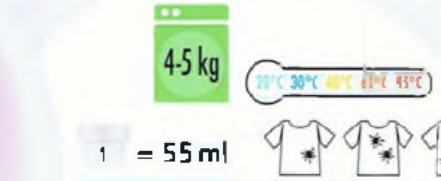
- **Call for the use of robust science and evidence which takes into account human and environmental exposure as well as hazard**, to help inform discussions and decision making on chemical safety.
- **Support for digitising ingredient and product information disclosure.** Recommend prioritising ingredient information which protects consumer safety on the product label (i.e. safe use of the product, essential allergens) - more in-depth information on the ingredients or the product as a whole can be featured online.
- **Call for the EC, in dialogue with industry, to develop a meaningful approach to communicate the environmental footprint of a product to consumers.** We support harmonised rules and conditions, but assessment needed of which tool would fit best. The current Product Environmental Footprint (PEF) tool and Ecolabel have serious shortcomings, which will need to be addressed in a new tool.

Non-animal safety assessment

Ending animal testing under REACH is essential for enabling businesses to remain competitive in Europe, whilst operating ethically and meeting consumer expectations. The US EPA (Environmental Protection Agency), for instance, has invested significantly into modern science-based approaches for chemical safety and has a commitment to replace animal testing with new approach methodologies (NAMs) by 2035 as included in the EPA roadmap recently published. Our scientists have over 30 years' experience in developing non-animal approaches for assuring product safety, and we have collaborated with more than 50 key partners across the world, including governments and NGOs.

We want to support the EC in establishing safety criteria for chemicals used in products, which are based on cutting-edge, non-animal safety science. Under REACH and BPR (Biocidal Product Regulation), animal testing still takes place to meet data requirements from regulatory lists. Some non-animal approaches are on these lists, but many more exist which could also be accepted. The EC's ambitious green growth strategy is an opportunity to review some of the more traditional regulations and approaches to gathering test data for ingredients. It will also help harmonise chemical regulation across all sectors in Europe.

- **Call for ECHA (European Chemicals Agency) to accept non-animal safety assessments** which are based on the latest science and exposure-based approaches ("new approach methodologies" – NAMs) and **promote innovation by removing mandatory animal testing requirements** when registering new chemicals.
- **Call for the EC to cooperate and align with NGOs and Industry to eliminate the need for animal testing for chemicals registration.**



1 = 55 ml

soft- medium hard water • eau douce et moyenne • weiches und mittelhartes Wasser	45 ml	55 ml	80 ml
hard water eau dure hartes Wasser	55 ml	70 ml	90 ml

6-7 kg = +20 ml

Dose properly. Order the dosing cap on: • En application de la convention entre le Ministère de l'Environnement et l'Association des Détergents, afin d'obtenir les meilleurs résultats de lavage sans gaspillage et sans apport superflu à l'environnement, informez-vous sur la dureté de votre eau (°f= degrés français) et suivez attentivement le mode d'emploi. Commandez le bouchon doseur: • Dosier richtig.
Bestellen Sie das entsprechende Dosiergerät bei:
www.typicallaundry.info

(UK) Liquid laundry detergent. Causes serious eye damage. Keep out of reach of children. IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. If medical advice is needed, have product container or label at hand. Contains Methyl-2-octynoate, Linalool, Isoeugenol, Benzisothiazol none. May produce an allergic reaction. MEA-Dodecylbenzenesulfonate, C12-15 Pareth-5. **(FR) Lessive liquide.** Provoque de graves lésions des yeux. Tenir hors de portée des enfants. EN CAS DE CONTACT AVEC LES YEUX: Rincer avec précaution à l'eau pendant plusieurs minutes. Enlever les éventuelles lentilles de contact si la victime en porte et si elles peuvent être facilement enlevées. Continuer à rincer. En cas de consultation d'un médecin, garder à disposition le récipient ou l'étiquette. Contient du (de la) Methyl 2-octynoate, Linalool, Isoeugenol, Benzisothiazolinone. Peut produire une réaction allergique. MEA-Dodecylbenzenesulfonate, C12-15 Pareth-5. **(DE) Flüssiges Waschmittel.** Verursacht schwere Augenschäden. Darf nicht in die Hände von Kindern gelangen. BEI KONTAKT MIT DEN AUGEN: Einige Minuten lang behutsam mit Wasser ausspülen. Eventuell vorhandene Kontaktlinsen nach Möglichkeit entfernen. Weiter ausspülen. Ist ärztlicher Rat erforderlich, Verpackung oder Kennzeichnungsetikett bereithalten. Enthält Methyl-2 octynoate, Linalool, Isoeugenol, Benzisothiazolinone. Kann allergische Reaktionen hervorrufen. MEA-Dodecylbenzenesulfonate C12-15 Pareth-5.

Danger • Gefahr

UFI 4H3Q-UDRC-1PEA-NM6F

(UK) Ingredients: 5-15% Anionic surfactants, Non ionic surfactants; <5% Phosphonates, Enzymes, Optical brighteners, Benzisothiazolinone, Perfume, Methyl-2-octynoate, Citronellol, Geraniol, Linalool. • **(FR) Ingrédients:** 5-15% Agents de surface anioniques, Agents de surface non-ioniques; <5% Phosphonates, Enzymes, Azurants optiques, Benzisothiazolinone, Parfum, Methyl-2-octynoate, Citronellol, Geraniol, Linalool. • **(DE) Inhaltstoffe:** 5-15% Anionische Tenside, Nichtionische Tenside; <5% Phosphonate, Enzyme, Optische Aufheller, Benzisothiazolinone, Duftstoffe, Methyl 2-Octynoate, Citronellol, Geraniol, Linalool.

www.thisbrandingredients.info

Producer and manufacturing address
Company X, Bvd du Souverain 165,
1160 Brussels, Belgium

12345678 A123

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1300 ml e

A·I·S·E

International Association for Soaps, Detergents and Maintenance Products

Ref. Ares(2020)6026818 - 28/10/2020

INDUSTRY PRIORITY

ZOOM IN ON THE LABEL

Duplication of safety information & inconsistencies

The implementation of the Detergent Regulation since 2004 has been a success particularly in terms of environmental protection (biodegradability of surfactants and phosphates-free formulations).

Nevertheless, new horizontal pieces of legislation governing the chemicals sector and subsequent labelling have been adopted in the meantime: REACH in 2006, CLP in 2008 and Biocidal product regulation in 2012. This has resulted in several provisions that are overlapping in particular in terms of redundant labelling provisions for ingredients, allergenic fragrance substances and preservatives, as illustrated here.

Typical CLP label in Europe - 3 languages

A.I.S.E.'S RECOMMENDATIONS

- **Build on the European Commission's Better Regulation Agenda** and address the duplication of information and inconsistencies on pack in the review of the Detergent Regulation and the Regulatory Fitness Check on chemicals legislation.
- **Ensure that labels become more consumer relevant and legible** for example by favoring the use of icons instead of text where relevant. Secure that priority information on pack such as safe use guidance, hazard profile and listing of allergens can be easily retrievable, understood and acted upon by consumers.
- **Consider the potential of digitalisation and online tools** (eg bar codes, QR codes, apps, websites etc) to convey expanded and customised information. Work together with interested parties and explore benefits to secure that this transition is enabled in an optimal way.

www.aise.eu