

THE SCIENTIFIC COMMITTEE ON COSMETIC PRODUCTS AND NON-FOOD PRODUCTS  
INTENDED FOR CONSUMERS

POSITION STATEMENT  
ON

CONSUMER SAFETY OF DETERGENTS, HOUSEHOLD & SIMILAR  
PRODUCTS

adopted by the SCCNFP during the 19<sup>th</sup> Plenary meeting  
of 27 February 2002

**1. Background**

In August 2001, DG ENTR ran an internet consultation on the subject of a proposed revision of the detergents legislation. Stakeholders' opinions were invited on the text of the draft proposal for a Regulation. In the draft, new provisions were included that made reference to the SCCNFP and, in particular, to the risk evaluation to be undertaken by the SCCNFP of detergent substances or preparations that are irritant or sensitising for man.

After consideration of the replies received, the reference to the SCCNFP was withdrawn from the draft proposal because it was considered by DG ENTR that the consumer would be sufficiently informed and protected through the labelling provisions provided for by the dangerous substances and/or the dangerous preparations directives.

However, these labelling provisions are insufficient for the consumer. The label must alert the consumer to products (detergents included in household products) containing specific substances to which they are allergic. This type of information can only be provided for by complete labelling of the ingredients. Moreover, the SCCNFP and/or other advisory committees of the Commission could play an important role relevant to consumer protection by reviewing the safety of possible 'problem'-substances.

A position statement was drafted on the need for providing full information to the consumer on the presence of ingredients in these products

**2. Position Statement**

The SCCNFP has a Specific Working Party 'Detergents, Household & Similar Products' that has been discussing aspects of consumer safety relevant to these products.

\* Current labelling of dangerous substances at European level is based on hazard estimation. However, in the case of detergents, household and similar products the global daily exposure of consumers may be so high that pro-active measures should be introduced to obtain the best achievable level of human safety.

\* The risk of an adverse health effect cannot be assessed without information on exposure and dose-response data. By extension full risk management cannot be performed.

\* Considering the current regulations on cosmetics, dangerous substances, biocides and the draft proposal on detergents, there are important overlaps, duplications and obvious scientific misinterpretations.

One simple example is the case of quaternary ammonium compounds that are affected by the three current regulations (dangerous substances, cosmetic products and biocides) and also by the draft proposal on detergents.

A second example is the case of geraniol, which may be used as a fragrance ingredient but also has biocidal properties and may be used as an anti-microbial.

\* Detergents, household and similar products are an important part of the global exposure of consumers to potentially toxic substances for two reasons :

Position Statement on Consumer Safety of Detergents, Household & Similar Products

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- in all households there is continuous and diverse use of these products;
  - in some cases, substances are used to wash laundry (clothes, bedlinen) and become incorporated into the textiles exposing the customer for long periods.
- \* Complete ingredient labelling is the most appropriate way to detect, study and manage irritative, allergenic and other adverse health effects caused by products used by consumers. The current cosmetic regulations have proved a fundamentally important format of providing such necessary information to protect consumers.
- \* Specifications of the ingredients used in the formulation of detergents, household and similar products should be under control, so that allergic reactions and other harmful effects due to substances and impurities may be avoided and managed.