

<Det> <Net>

DETERGENT INDUSTRY NETWORK FOR CLP CLASSIFICATION

A COLLECTIVE INDUSTRY APPROACH TO CLASSIFY AND LABEL YOUR DETERGENT PRODUCTS (FOR SKIN AND EYE EFFECTS)

BACKGROUND: THE CLP REGULATION AND SAFE USE COMMUNICATION

Since June 2015, classification and labelling of mixtures for household detergents and cleaning products became mandatory under the CLP Regulation (EC) No 1272/2008. CLP is an essential tool to alert users of product hazards. The primary goal of A.I.S.E. member companies is to ensure safe use of products.

More specifically, it is critical that industry can meet the new legal requirements in a way that allows consumers to:

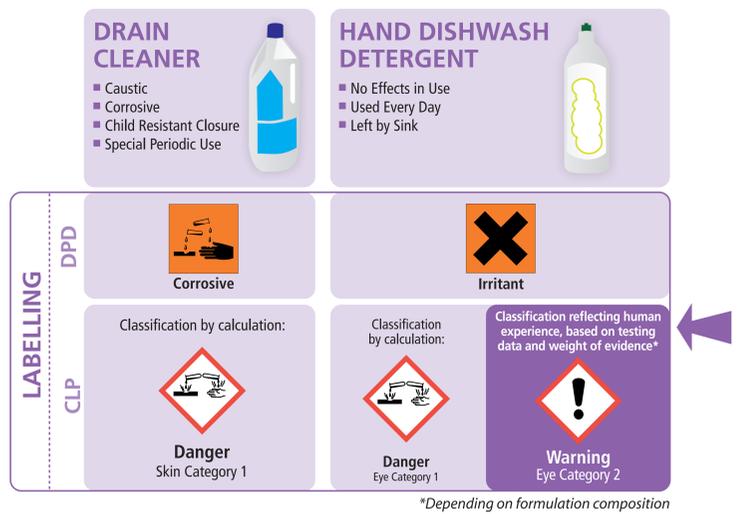
- Recognise the hazard
- Distinguish between products of different hazards
- Understand a relevant and adequate label

THE ISSUE: POTENTIAL MORE-SEVERE LABELLING BASED ON CLASSIFICATION BY CALCULATION (ADDITIVITY METHOD)

The impact of the CLP Regulation for A.I.S.E. products, using the classification by calculation, in the absence of test data, would lead to many more daily use products being more severely classified and labelled (see example aside).

This classification by calculation would then result in:

- Not reflecting actual effects on man based on human experience
- Devaluing warning labels; no ability to differentiate really hazardous products if all products bear the same pictograms
- Leading to unsafe handling of the really hazardous products
- Confusing poison centers and consumers



THE ALTERNATIVE: AN AMBITIOUS 3 YEAR PROJECT BY INDUSTRY TO SECURE AN ADEQUATE AND COLLECTIVE IMPLEMENTATION OF CLP

In 2010, in line with the new CLP provision allowing the formation of a classification network and building on the CLP hierarchy of data for classification, A.I.S.E. initiated a broad project with the objective to secure adequate data generation for safety assessment, and thus, classification and labelling of products. This project comprising of two main pillars has been developed with high level expertise and in dialogue with external stakeholders:

