



Digital Product Passport for the detergent industry



Before we start...

The event is recorded, and all attendees are muted

The recording of the event, presentations, A.I.S.E views and recommendations will be shared early next week via email

Due to the very high number of participants, the chat functionality is not available

Questions can be submitted via Slido



General introduction and welcome

Alexis Van Maercke

Director General, A.I.S.E.



Introduction to the digital
product passport in the scope of
Detergent Regulation



About the A.I.S.E. network

The detergents and maintenance products industry across Europe

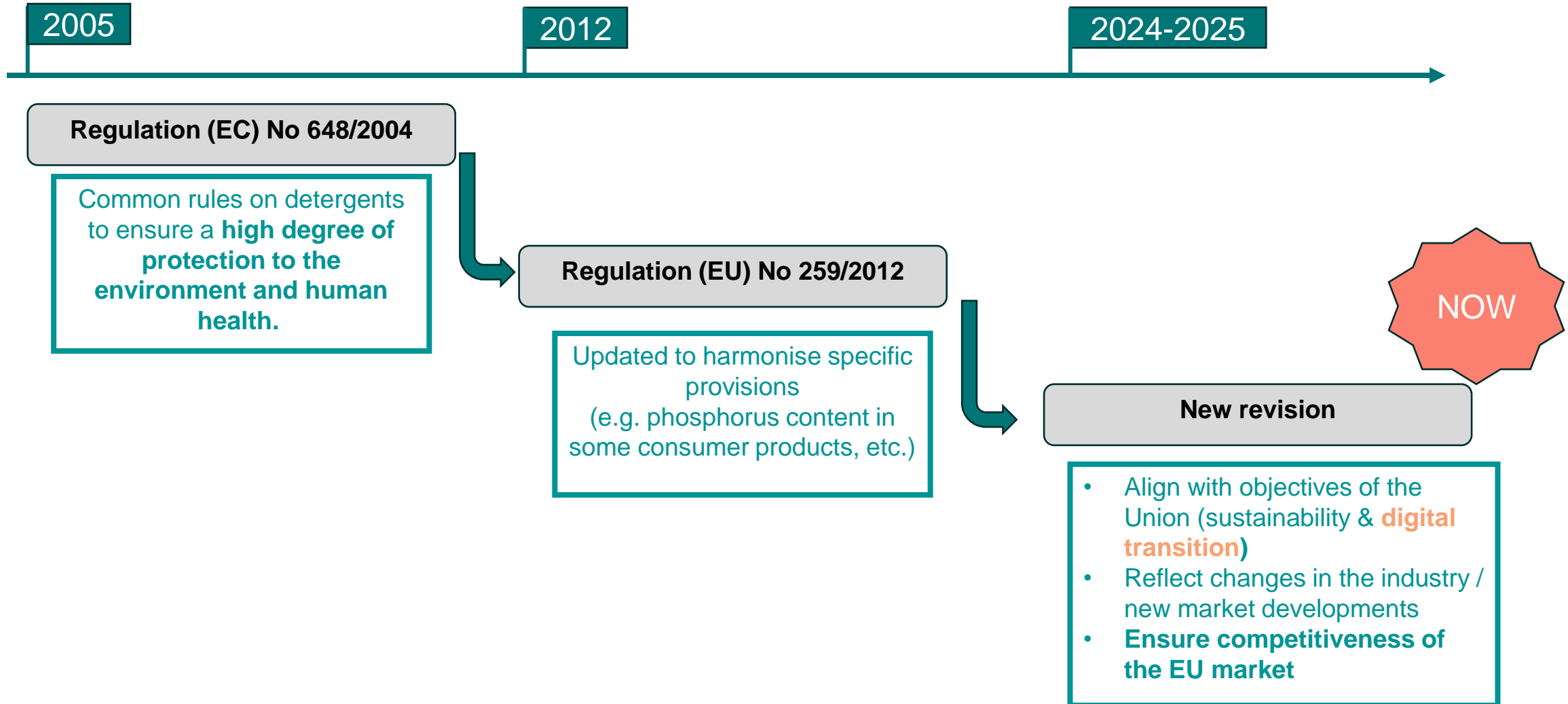
A.I.S.E. represents the detergents & maintenance products industry in Europe. Based in Brussels, A.I.S.E. has been the voice of the industry to EU regulators **for more than 70 years**. Membership consists of 29 national associations across Europe, 19 corporate members and 23 value chain partners. Through this extensive network, A.I.S.E. represents **over 900 companies** supplying household and professional cleaning products and services across Europe.

The industry is a substantial contributor to the European economy with an annual **market value of €45,5 billion**, directly employing 95 000 and 360 000 throughout the value chain.

A.I.S.E. has a long history in leading voluntary industry initiatives that focus on sustainable design, manufacturing and consumption, product safety and safe use of products by consumers and professional customers.



DETERGENTS REGULATION

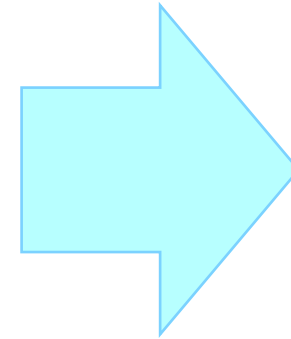


DETERGENTS REGULATION (EC) NO 648/2004

✓ Why is it being revised



1. Reflect new market trends
2. Digitalisation & Modernisation



✓ What should the revision ensure

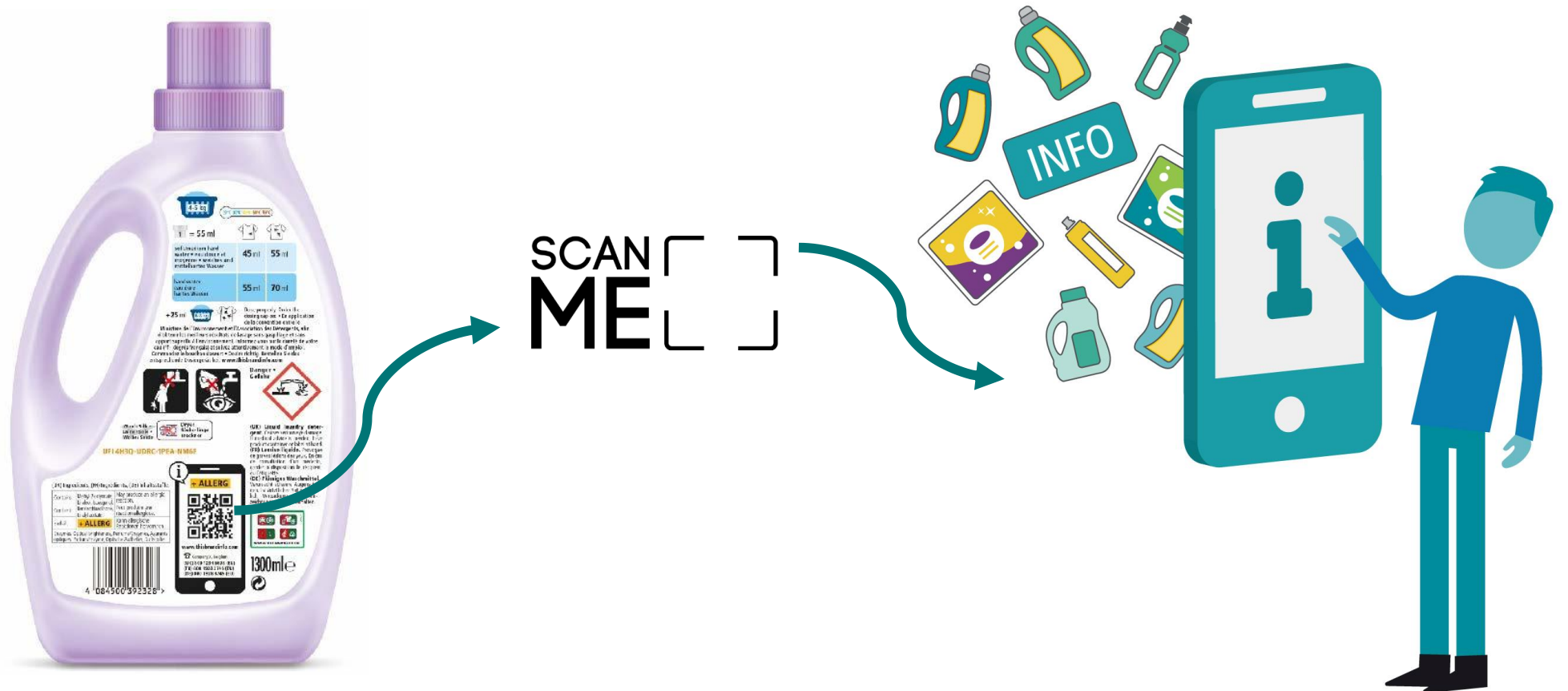
- Better regulation
- Future-proof legislation
- Enable innovation
- Competitiveness of the EU market



PURPOSE OF THE DPP

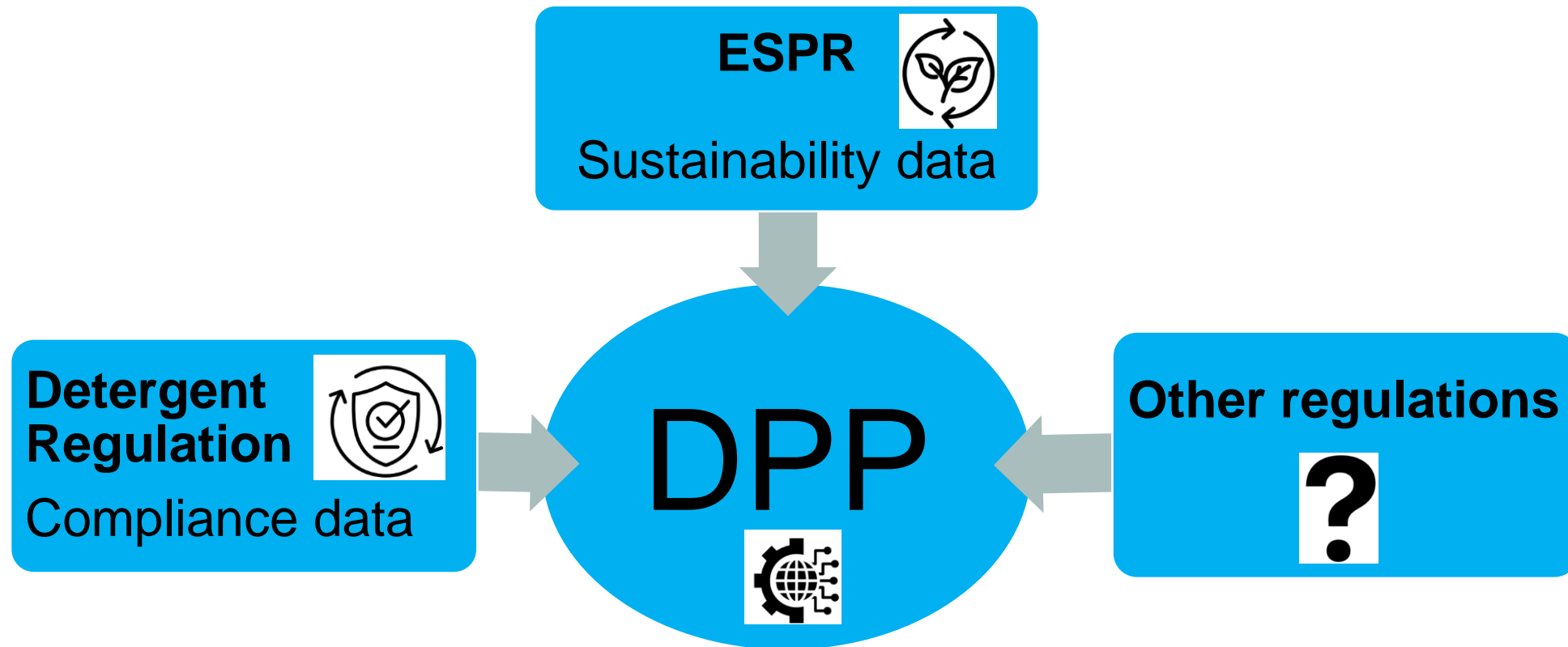
Enhance transparency, digitalisation and sustainability.

Facilitate access to product information in the detergent products.



REGULATORY CONTEXT

Provisions introduced through the Detergents Regulation & ESPR



Agenda



1

How does the model definition impact label scrapping?
Julia Kheifets, Reckitt

2

Impact assessment of the digital product passport implementation
Bernd Glassl, IKW

3

The future of the digital product passport for detergents
Marion Van Deurzen, Unilever

4

Questions & Answers

5

Conclusion and key topics for the detergents industry
Sascha Nissen, A.I.S.E.



How does the model definition impact packaging scrapping?

Julia Kheifets

Global Regulatory & Safety Strategy Lead, Reckitt



Details and implications of model definitions on the label management and scrapping



LABELS MANAGEMENT TODAY



TODAY'S LABELING OF DETERGENTS

Label:

- Information about ingredients: anionic surfactant 5-15%...
- Changed every 2-5 years.



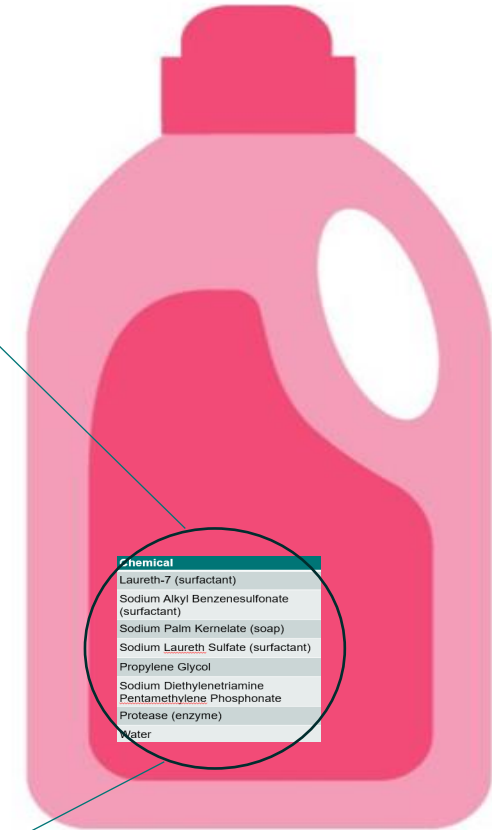
Formula:

- In most cases notified to Poison Center (CAS #..), has UFI code.
- Changed every 2-5 years



LIQUID LAUNDRY DETERGENT COMPOSITION.

CAS №	Chemical	Percentage (%)
68439-50-9	Surfactant: Laureth-7	10.00
68411-30-3	Surfactant: Sodium Alkyl Benzenesulfonate	8.00
68585-34-2	Surfactant: Sodium Laureth Sulfate	2.00
22042-96-2	Phosphonate	1.30
9014-1-01	Enzyme	0.30
7732-18-5	Water	70.00



- Laureth-7 (surfactant)
- Sodium Alkyl Benzenesulfonate (surfactant)
- Sodium Palm Kernelate (soap)
- Sodium Laureth Sulfate (surfactant)
- Propylene Glycol
- Sodium Diethylenetriamine
- Pentamethylene Phosphonate
- Protease (enzyme)
- Water

~15 ingredients

Only key ingredients are shown. Detailed composition is provided in the Annex.



TYPICAL SUPPLY SITUATIONS.

CAS №	Chemical	Percentage (%)
68439-50-9	Surfactant: Laureth-7	10.00
68411-30-3	Surfactant: Sodium Alkyl Benzenesulfonate	8.00
61789-89-7	Sodium Palm Kernelate (soap)	3.00
68585-34-2	Sodium Laureth Sulfate (surfactant)	2.00
22042-96-2	Phosphonate	1.30
9014-1-01	Protease (enzyme)	0.30
7732-18-5	Water	70.00

Detailed composition is provided in the Annex.

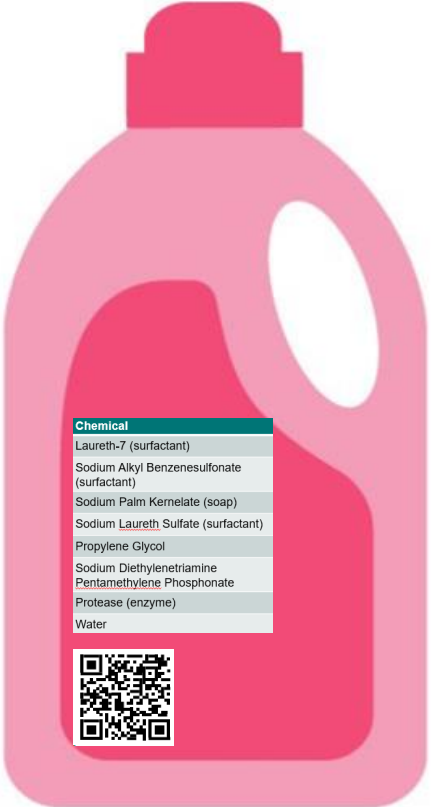
Surfactant is unavailable through original supplier. Alternative is available from another supplier, however with the different CAS #

Today

CLP allows interchangeable components
Poison center notification updated
No label change: anionic surfactant 5-15%



INTRODUCTION OF THE DIGITAL PRODUCT PASSPORT



TODAY'S LABELING OF DETERGENTS

Model = Annex V (EP text)

- Information about ingredients: anionic surfactant 5-15%...

Label changed every 2-5 years.



Model = Annex IV (Council text):

- Ingredients with CAS #

Label changes up to several times a year. The more frequent labels are changing, the higher is the label scrap.



SHOULD LABEL BE CHANGED?

	Model (Council)	Model (EP)
	Annex IV (ingredient list with CAS#)	Annex V (Ingredient list on the Label)
Change in surfactant	Yes	No
# of Artwork changes for 1 SME*/year	10	0

Industry recommends to define Model through Annex V as it correlates with current labels info and helps avoiding labels scrapping.

For the same reason addition of CAS # in the DPP content is to be avoided.

*Assuming SME manufactures 10 Models of detergents



Impact assessment of the digital product passport implementation

Bernd Glassl

Head of the Department of Home Care Products, IKW



Cost estimation for detergent manufacturers due to the implementation of DPP, highlighting SME perspective



Estimation of costs for detergent manufacturers within IKW due to the digital product passport (DPP)

Bernd Glassl, IKW; 8 October 2024

The German Cosmetic, Toiletry, Perfumery
and Detergent Association (IKW)



The project to estimate costs for manufacturers for the DPP

- IKW: about **130 members** which market detergents in Germany /440 members in total
- Cost estimations in the project refer to these 130 members.
- Time: June to August 2024; final report issued on 17 September 2024
- Participants:
 - 8 IKW members (of which 4 are direct members of A.I.S.E.)
 - IKW Office

Reference documents used within the project:

New Detergents and Surfactants Regulation

1. COM: Proposal of 28 April 2023
2. EP: Legislative Resolution (Result of 1st reading)
3. Council: Document of 14 June 2024



Estimation of costs

1. **„Batch“** versus **„model“** as defined by EP versus **„model“** as discussed by Council
2. Running costs
3. Commissioning external DPP service providers
4. Company's own IT programme for the creation and provision of the DPP
(no estimation was possible)

„Batch“ *versus* „model“ (EP) *versus* „model“ (Council) for one detergent / Results

Batch:

- **Up to 3,750 batches per year (meaning up to 3,750 DPP's per year)**

Model as proposed in the Council:

- **1 to 3 changes per year**

Model as defined by EP:

- **0,2 to 1 changes per year**

Data carrier (e. g. a QR-Code) and DPP

Data carrier ...

- will be mandatory on each pack,
- shall lead to the DPP,
- to be the link between the digital and analogue worlds.

An updated DPP requires a new data carrier on the label.



Old data carrier leads to old DPP.

Unused packaging with old data carrier **must be disposed of.**

Costs for printing the data carrier on the label

Data carrier on the label:

Best quality if integrated in the art work of label or packaging

Problem: If the data carrier changes frequently, this leads to frequent destruction of unused packaging material.

Sustainable?

Solution: Printing of data carriers after filling of the packaging

Costs: **Investment for printers, cameras, rearrangement of filling lines:**

Estimation: 5 filling lines per IKW Member, **130** companies
printers etc. €50,000 to €250,000 / Average: **€100,000**

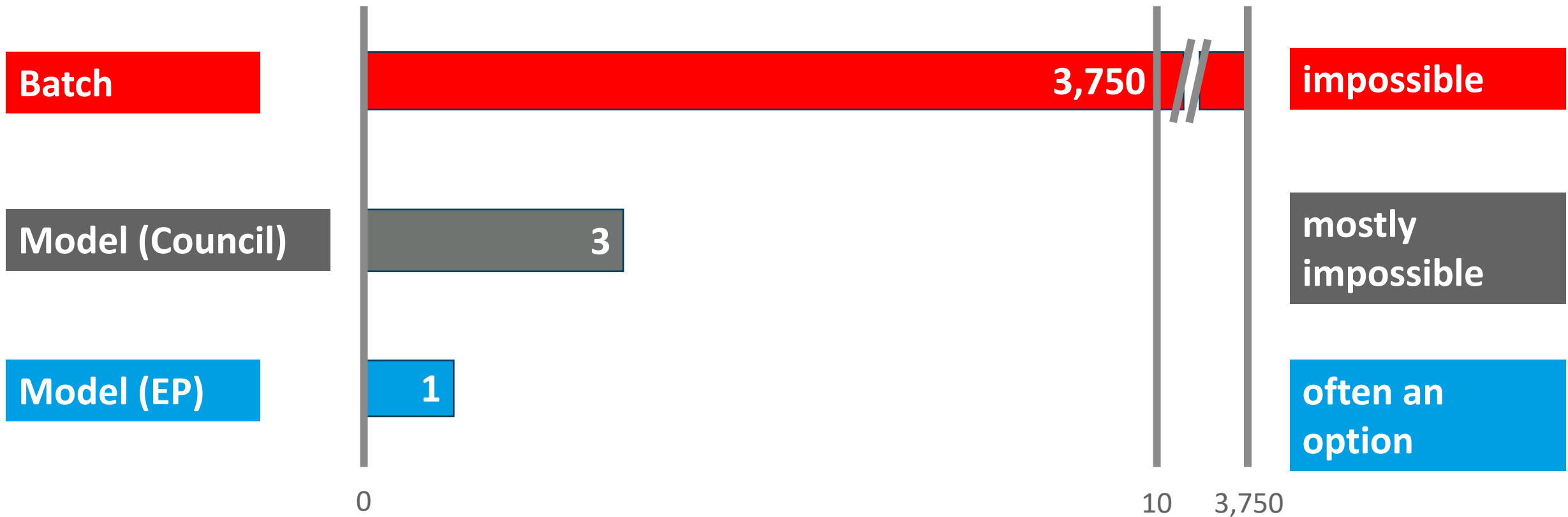
5 x 130 x €100,000 = €65 million

Limitation: Printing after filling not possible e.g. for pouches, refill pouches, tubes; will lead to destruction of unused packaging

Sustainable?



Change of batches or models per year (maximum figures)



Model definition of EP will help to reduce the investment costs of €65 millions for printing the data carrier after filling.

Further costs

- Annual costs for further personnel:
 - due to DPP need for 0.5 to 5 new full-time positions per company in the long term
 - Full-time position in Germany: €100,000 per year.
 - **Assumption: one full-time position per company, for the 130 IKW members: €13 million per year**
- Expected costs of commissioning external DPP service providers
 - Range: €200 to more than €10,000 per DPP
 - **Assumptions: average € 1,000 per DPP; 50 DPPs per year**
€1,000 x 50 DPPs per year x 130 = €6.5 million per year

Further costs

- **A realistic estimate of the costs and effort required for an IT programme to create and provide digital product passports could not be made as part of this project.**
- EP: Technical documentation and the results of the conformity assessment procedure to become binding parts of the product passport which should, only available e. g. to the market surveillance authorities and the COM.
- Consequences:
 - **significant increase of costs for companies**, if they or a service provider had to give authorities special access rights and companies had to provide authorities with additional information;
 - Expensive special security measures against unauthorised access would have to be taken; even then risk of loss of confidential business information.

Summary: Estimated costs for IKW members

	Batch	Model (Council)	Model (EP)
Printing after filling	€65 millions (investment)	€65 millions (investment) or lower	Considerably lower
Personnel costs	Immensely higher	€13 millions per year or higher	€13 millions per year
External DPP service providers	Immensely higher	€6.5 millions per year or higher	€6.5 millions per year

Model definition of EP will reduce costs of the DPP considerably.

N. B:

Full costs for IKW members as part of the implementation of the DPP for detergents **cannot yet be estimated.**

Many aspects are still unclear, the standards and regulations required for preparation and detailed guidelines for the practical implementation of the DPP do not exist yet.

The future of the digital product passport for detergents

Marion Van Deurzen

Home Care Regulatory Affairs Lead Europe, Unilever



Transforming detergent
transparency with DPP



TRANSFORMATION

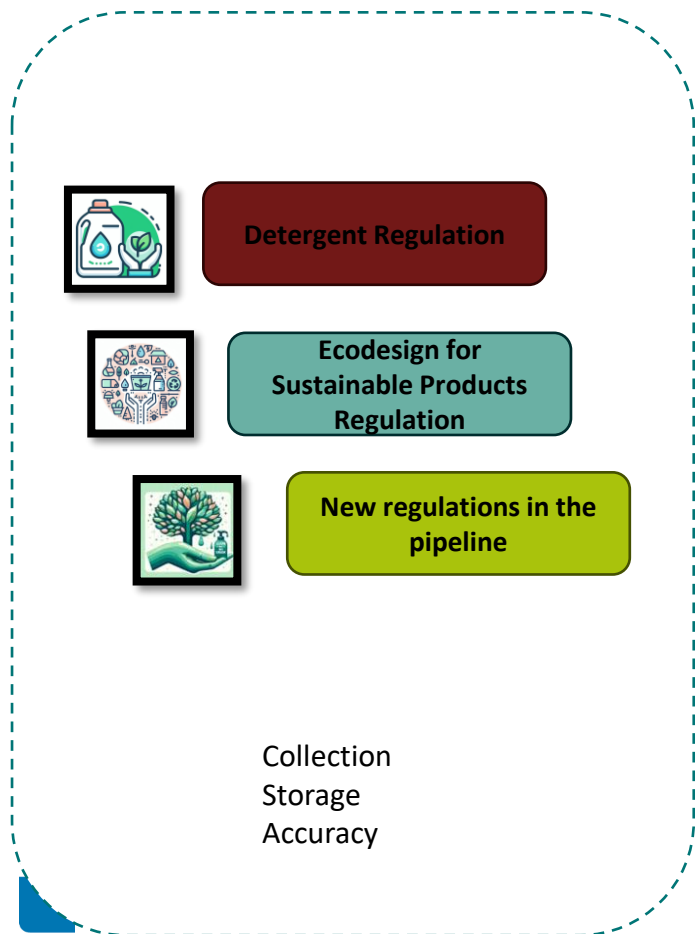


Iconic House with big windows.....

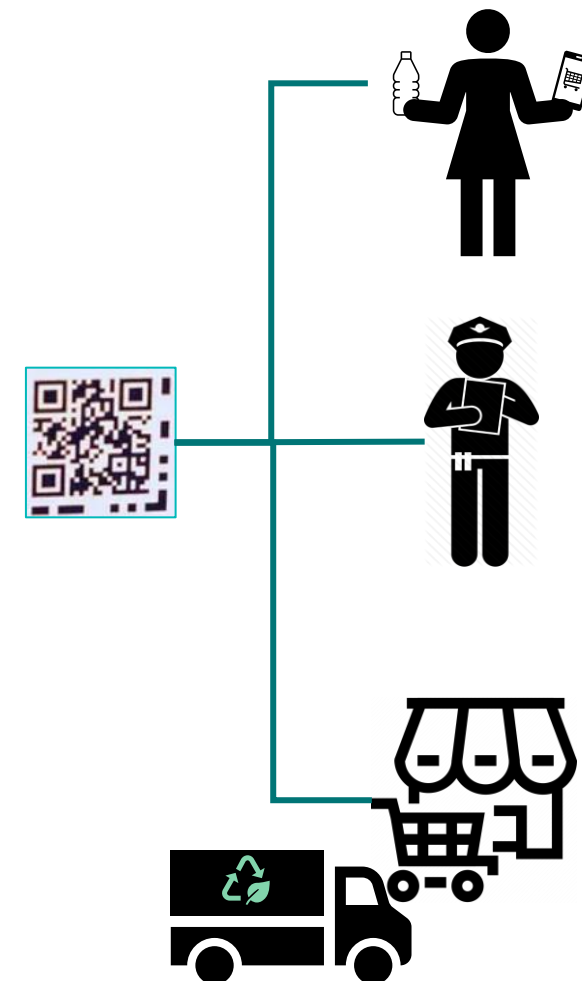
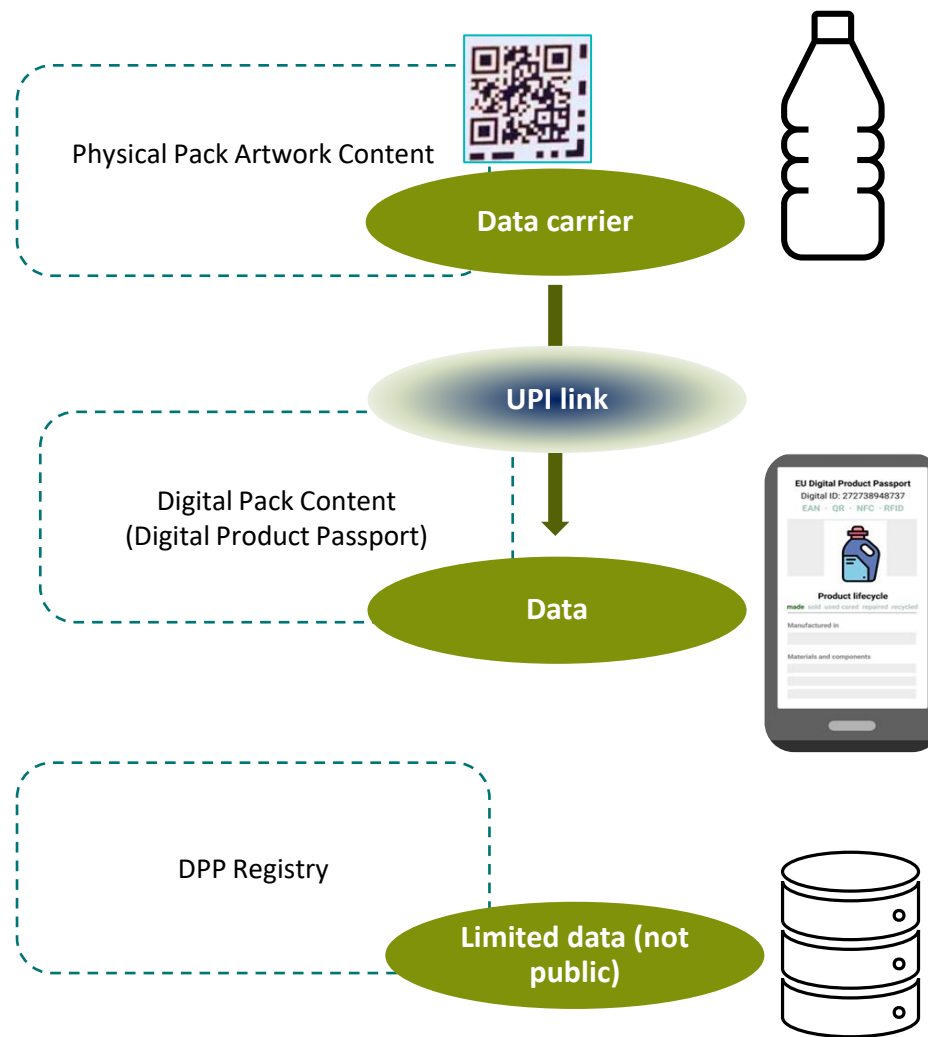
Glass House..

THE DPP FOR DETERGENTS: COMPLEX INTERACTION OF DATA & SYSTEMS & INTERACTION

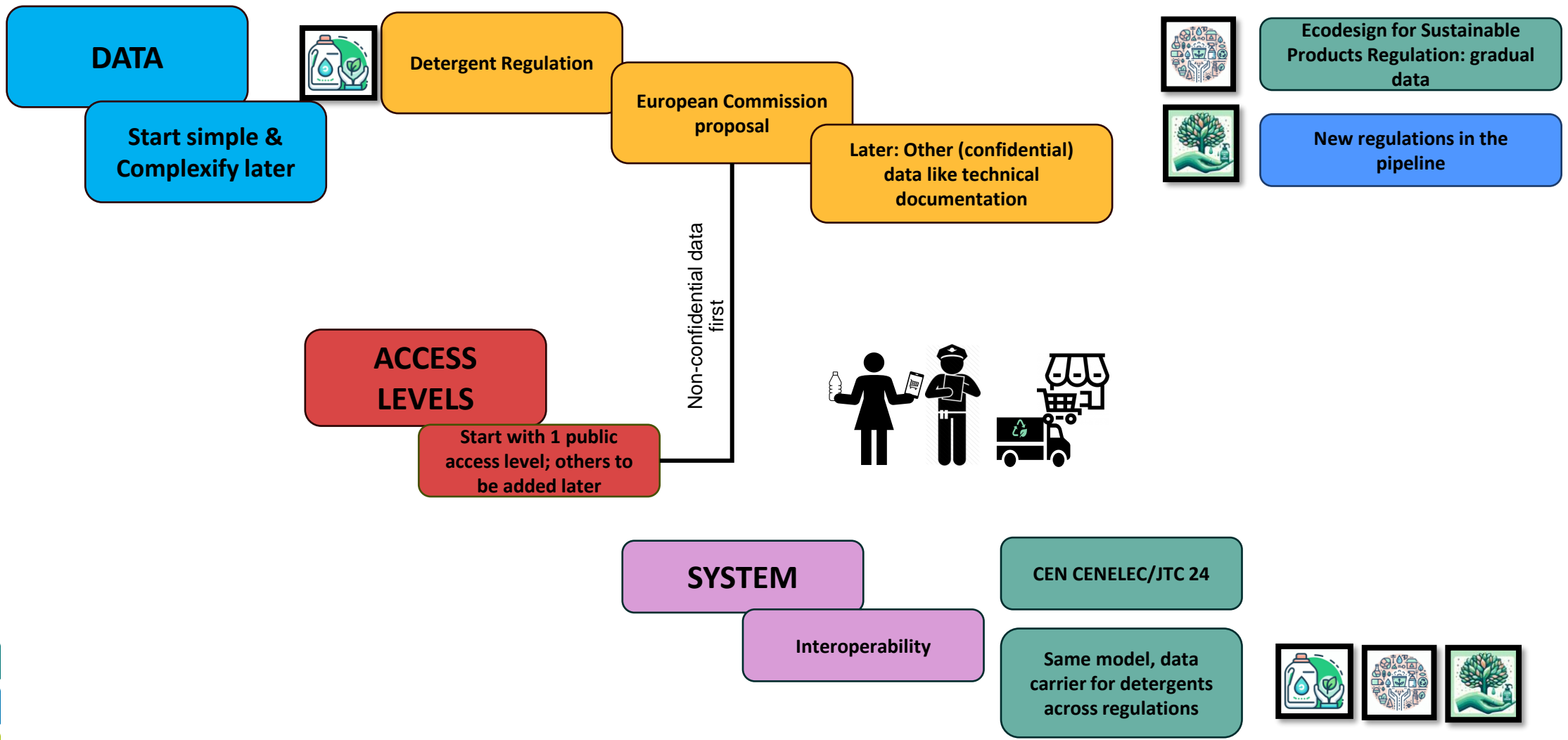
DATA



CONTENT CURATION



THE DPP FOR DETERGENTS: LEARN & ADAPT, GRADUAL APPROACH



Key legislative milestones (estimates)



Milestones

Detergent Regulation
Entry into force

Compliance data, model
definition for detergents

Harmonized system
standards for DPP
delivered

Detergent Regulation Data &
data carrier technical
requirements (impl act)

- 1. Data carrier: type & lay-out
- 2. The technical elements of the passport
- 3. Actors that may introduce info into the DPP

Detergent
Regulation
Application date

All artwork will need to be changed to incorporate the data carrier, starting when there is clarity on system standards (JTC 24) & data carrier (implementing act)

In order to prevent label scrapping , ideally transition time would be 3 years after both the standards & implementing act have been established, similar to the additional fragrance allergens implementation



Designing the future of the DPP for detergents



Iconic House with big windows.....



Glass House..



Data (windows):

System (architecture):

gradual approach

interoperable, consistent, pragmatic design
with sufficient time to incorporate the complex
transformation

QUESTIONS & ANSWERS

Conclusion



Sascha Nissen

Deputy director general & Director of Sustainability,
A.I.S.E.

Key messages

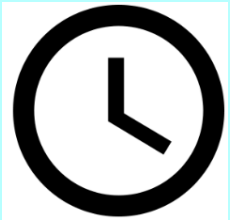


A.I.S.E. CONCLUDING REMARKS



Granularity level: **Model**

Model defined as **Annex V**- labelling requirements proposed by European Parliament.



Feasible **timing** that allows us a proper implementation.



Harmonisation between Detergents Regulation and ESPR.

THANK YOU!

