



Women engage for a common future

WECF's perspective to the consultation on the EU Detergents Regulation

Women Engage for a Common Future International, WECF International, is a network of over 265 eco feminist organizations who are active in 72 countries around the world. We are committed to building a healthy environment and moving towards a toxic free future for all. WECF International in common with WECF France and WECF e.V, Germany welcomes the survey presented by the EU Commission related to the revision of the Detergents Regulation 648/2004 and the opportunity to comment on it. WECF calls on the EU authorities to strengthen EU regulations, including the Detergents Regulation in sense of the European Chemical Strategy for Sustainability and a zero-pollution ambition to truly protect human health and the environment.

The Detergents Regulation reduced emissions of certain hazardous substances such as phosphorous in the environment and has harmonized the internal market of detergents. The Detergents Regulation nevertheless still has failed to achieve a high level of protection to human health and the environment. Detergents are daily used consumer products and products used professionally in the cleaning sector. During the covid-19 pandemic the use of detergents increased. Detergents are directly released into water streams, residues of harmful compounds regularly can be found in wastewater. Considering all these factors it is clear that the Detergents Regulation is not adapted to safeguard human health & the environment. This is particularly true when it comes to women's health.

Why gender matters ?

Women are particularly exposed to chemicals contained in detergents. Domestic Work, including dealing with detergents, also in Europe mainly is the task of women. In Germany as well as in France 72 % of housework is done by women. Also, in the professional cleaning sector as well as in the health sector, where cleaning agents are used in large quantities, women represent the majority of employees and are disproportionately exposed to harmful chemicals in detergents. Next to these social and socio-economic factors (household work, majority of employees in the cleaning sector) some biological factors (skin absorbance or hormonal system distribution) impact women's bodies and health differently.

The use of detergents release among other substances Volatile Organic Compounds. Exposure to these substances have long term consequences on respiratory systems. Detergents can also contain other harmful substances such as endocrine disrupting chemicals e.g. fragrances and preservatives. The exposure happens through respiratory contact but also through dermal contact. Especially in private use household work often



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people do not use specific protecting equipment. Pregnant women are particularly sensitive to exposure to pollutants; they are not only themselves, but also the unborn child is exposed to the substances. For all these reasons, the Detergents Regulation should be revised to take these factors under account.

Women are also the main group which purchases detergents and therefore are mainly readers of labels. The labelling of detergents is often incomplete or not complied with. The French Control of Consumers Product Authority (DGCCRF) found in a 2019 study, that 18.5% of detergents were not correctly labelled and 49% of detergents did not comply with the CLP legislation. This means that many users are neither properly informed about the content of the product nor on its correct use and the hazard class. Information provided on internet is also insufficient to raise awareness of the hazards of these products. The Detergents Regulation should be updated to disclose the full list of ingredients of the product with precautionary measures to be taken during use. This should be done in a clear manner and with a special note for pregnant women.

The EU Chemical strategy for sustainability has made a commitment to take exposure to mixtures of chemicals more into account; detergents are a widely used consumers product daily. Therefore, as with food or cosmetics, all ingredients should be labelled on the product so that consumers are aware to what chemicals they are exposed to. The detergents should also have a set of rules that strictly regulate false environmental claims. Many products contain claims such as “non-toxic” or “safe” or refer to voluntary business schemes with the term Green. This is misleading for consumers who want to choose a product certified by an independent body.

Detergents also often contain microplastics and nanoparticles which, despite their harmful effects on the environment, are not currently considered substances that need to be specifically labelled under the regulation. Finally limits on phosphates that apply to certain types of products (laundry detergents and dishwasher soap) should apply to all detergent product such as hand-wash dish soap and professional detergents. Indeed, the overall objective is to limit the release of phosphates in the environment this can only be achieved if all products stop releasing phosphates into the water systems.



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Our demands:

- to include gender in the Detergents Regulation when it comes to assessing risk of substances present in products and labelling products specifically for pregnant women
- to take measures for clearer labelling with full listing of all ingredients in a product
- to include labelling of nano particles and micro-plastics with a special mention because of their specific impact on the environment. Detergent Regulation will have to align with other EU and international developments on the ban of micro-plastics in products.
- to ban of phosphates in all detergents
- to clearly integrate the high protection of human health & environment principle in this regulation
- to have a stricter EU wide compliance policy

Sources

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