



EU Consultation: Detergents – streamlining and updating the EU rules

European Association of Chemical Distributors (Fecc)
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Fecc, European Association of Chemical Distributors in Europe, welcomes the opportunity to provide feedback on the open EU COM public consultation on the initiative to revise Regulation (EC) 648/2004 on detergents and would like to draw attention to the following:

Fecc agree with the Commission's assessment (SWD Evaluation of Regulation (EC) No 648/2004) that the aims of the Detergents Regulation are relevant, the rules are consistent and complete, the Regulation has achieved its aims to a large extent.

The Detergents Regulation No 648/2004 is focussed for cleaning products, and its implementation by the Detergents and Maintenance products sector has been a success. It was stated in the Commission Staff Working Document on the evaluation of the Regulation, that the Detergent Regulation has achieved its aims to a large extent.

We believe that the sector should continue to be regulated via the Detergents Regulation and not be incorporated into other chemical legislation or moved under the New Legislative Framework. In line with the Better Regulation Agenda, the Detergents Regulation should be applied coherently and consistently with the overall legal framework. Overlaps and inconsistencies with the REACH, CLP and BPR should be addressed so there will be no discrepancies and duplications in the future. The Detergents Regulation remains fit for purpose and we do not see the value of moving the Regulation under the New Legislative Framework (NLF).

With regards to labelling, we support the Commission study on simplification of the labelling requirements for chemicals and the use of e-labelling. In order to reduce the administrative burden for the detergent industry, and, at the same time, to make labels easier to understand for end users, a simplification of the market regulations and optimization of the labels are to be achieved. As many detergent products are manufactured by SMEs, the implementation of IT solutions would mean high additional personnel and financial effort for SMEs, which would suffer high impact from such an administrative burden.

Contact

[Fecc](#) represents around 1,600 companies of which many are small and medium sized companies (SMEs). Fecc and its members contribute to innovation and sustainability besides adding value in the supply chain, by sourcing, developing, marketing, and distributing a wide range of specialty chemicals and ingredients to over one million downstream users ranging from automotive, electronics, paint, construction to pharmaceutical, cosmetics, food and nutrition industries, each with their own specialised needs.

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