

Mise en œuvre du Règlement Détergents Point sur le Digital Product Passport

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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.

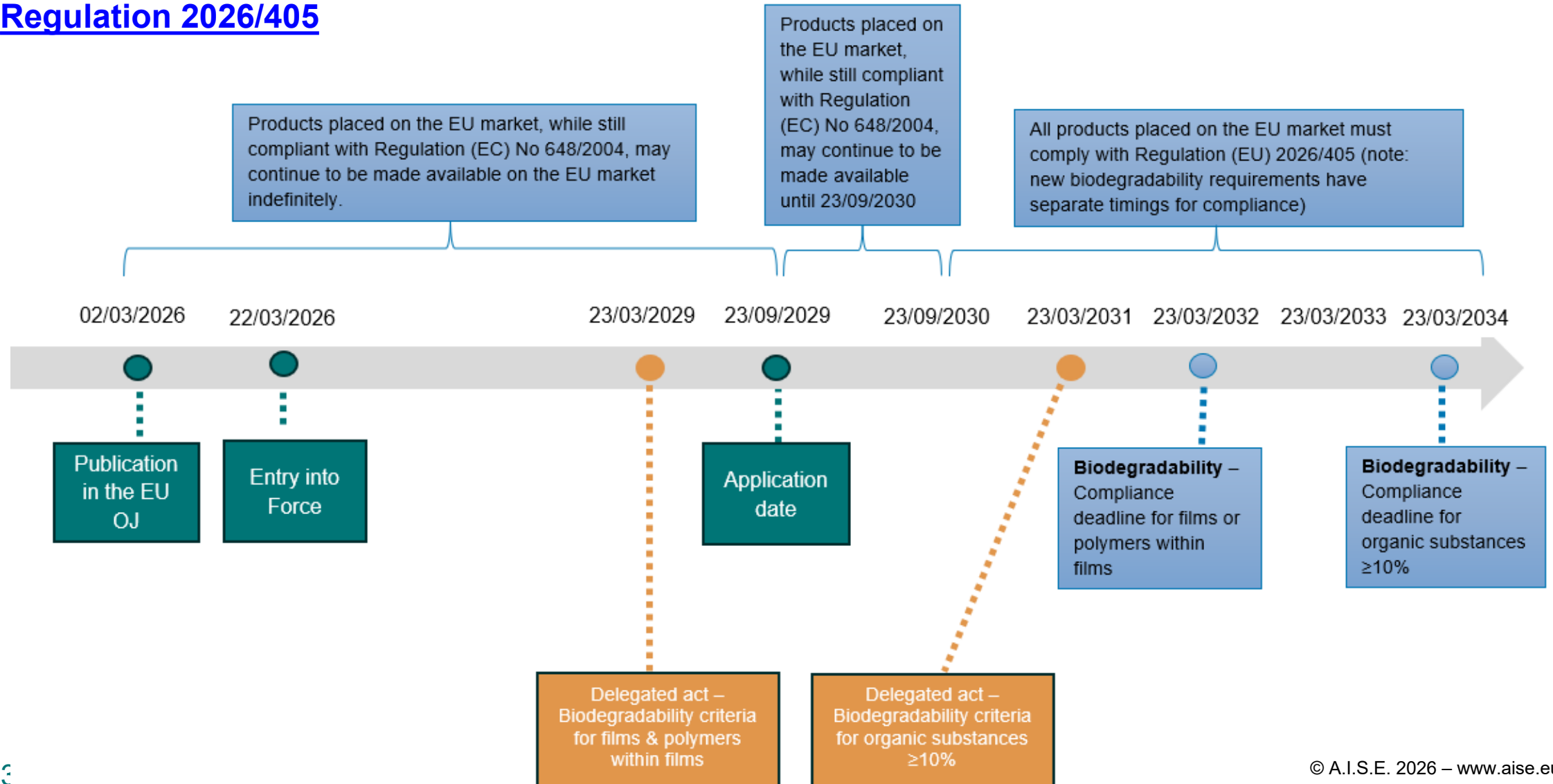
The industry is a substantial contributor to the European economy with an annual **market value of €45,5 billion**, directly employing 95 000 and 360 000 throughout the value chain.

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 REVISION

Regulation 2026/405



NEXT STEPS...



TOPICS INCLUDED IN THE REVISION

Application & transitional periods

Animal testing

Refill

Biodegradability

Digital Product Passport

Obligations of economic operators

Phosphorus

Ingredient data sheet

Market surveillance & penalties

Microorganisms

Physical & digital labels

Secondary legislation

Biodegradability

BIODEGRADABILITY

The New Detergents Regulation maintains existing biodegradability criteria for surfactants.



The Regulation foresees the creation of new biodegradability criteria:

Polymers / films (in detergents capsules)	Organic substances	Derogations
<ul style="list-style-type: none"> By 23 March 2029, EC to establish new criteria via delegated act By 23 March 2032, films or polymers within films must comply with new biodegradability criteria 	<p>Present in $\geq 10\%$ w/w (excluding water)</p> <ul style="list-style-type: none"> By 23 March 2031, EC to establish new criteria via delegated act By 23 March 2034, organic substances $\geq 10\%$ w/w must comply with new biodegradability criteria <p>Present in $< 10\%$ w/w (excluding water)</p> <ul style="list-style-type: none"> By 23 March 2033, EC to assess the feasibility of new biodegradability requirements 	<p>The Commission is empowered to introduce derogations from biodegradability criteria in duly justified cases</p>

Microorganisms



Use of biotechnology in the detergents sector

Microorganisms are used as innovative technology in detergents to help with the degradation of dirt & soils

Microorganisms continuously produce enzymes, which target the specific cleavage of organic soils, such as fat, starch, proteins, etc.

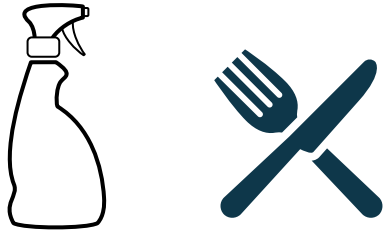


Detergents Regulation

Microbial cleaners shall be placed on the market if assessed as safe based on a **risk assessment methodology**.

- Such official methodology will need to be developed and issued by the Commission by 23 September 2028.
- The risk assessment should be performed **at strain level and product level** under all foreseeable use conditions.
- The risk assessment methodology should be **based on non-animal new approach methodologies**.

Exposure routes will be assessed in the risk assessment



- No restriction to spray format, if spray product is assessed as safe based on the risk assessment → **dermal & respiratory sensitisation** assessed for spray format
- Precautionary statement on the label “do not use on surfaces in contact with food”, unless assessed as safe based on the risk assessment
→ risks linked to **potential ingestion**

Additional requirements

- Specific pathogenic strains cannot be intentionally added (E. Coli, Streptococcus spp, etc.)
- GMOs prohibited for use in detergents.
- Specific requirements for plate count & shelf life.
- Shelf life to be indicated on the label.
- Information on microorganisms / microbial cleaner to be listed in the digital product passport, technical documentation & ingredient data sheet.



Animal testing



The new Detergents Regulation will establish a general prohibition on the use of animal testing **to demonstrate compliance with the Detergents Regulation.**

- Conformity with this Regulation must be assessed using non-animal new approach methods validated at the EU or international level.
- The ban applies to testing of final formulations, ingredients, or ingredient combinations **for the purpose of meeting the requirements of the Detergents Regulation.**
- These provisions are to be applied **without prejudice to other relevant EU laws.**
- Importantly, the article also **permits the use of historical animal data generated prior to the Regulation's entry into force.**



Digital product passport

DIGITAL PRODUCT PASSPORT (DPP)

NEW

- Originally introduced by the **Ecodesign for Sustainable Products Regulation (ESPR)** but also present in other pieces of legislations (such as Detergents Regulation)
- Purpose of the digital product passport:
 - Enhance transparency, digitalisation and sustainability
 - **Facilitate access to product information** (for end-users, market surveillance & customs authorities)
- The DPP should be available through a **data carrier** (e.g. QR code) printed on the label, packaging or present on an accompanying document (if product sold in bulk), accompanied by a **statement such as “Please scan for more comprehensive information on the product” or a similar message.**



SCAN []
ME []



ESPR gives the possibility
to create the DPP at 3
different levels

Item

Batch

Model

Product legislation to
determine the level

The DPP for detergents will be linked to a **‘model’**:

‘model’ means a type of detergents or surfactants all of whose units meet the following conditions:

- they have the same manufacturer and are placed on the market under the same trade name;
- they have the same content, in accordance with Part A of Annex V, and are manufactured using the same manufacturing processes;
- where applicable, they are subject to the same classification under Regulation (EC) No 1272/2008; and
- they are defined by a type number or other element allowing them to be identified as a group;

(Annex V = labelling requirements)

DIGITAL PRODUCT PASSPORT (DPP)

Information to be contained in the DPP:

- **Mandatory information**

- Trade name of the product or its Unique Product Identifier (UPI)
- Picture of the packaging or of the label of the product
- Manufacturer/importer/authorized representative contact details (if applicable for importer & authorized representative)
- Identify of the DPP service provider who has been designed to save back-up copies of this DPP
- Statement that the product complies with the Detergents Regulation provisions
- Relevant Union Laws that the product complies with
- Ingredient list (**excluding for industrial/institutional detergents, to avoid duplication with the SDS**)
- Microorganisms data (if applicable)

- **Voluntary information:** some labelling information

- **Access levels foreseen:** stakeholders to access the DPP & view the information they have be granted the rights to see





Registration

- Before market placement, economic operators must upload the DPP's unique identifiers to the **EU registry**.
- The registry will issue a unique registration identifier.
- Customs and competent authorities will have access to the registry for enforcement and verification.



Data storage & back-up

- While the manufacturer is responsible for the DPP creation, the manufacturer has the choice to store the DPPs on his own or to use a **DPP service provider**, who will store the DPPs for the manufacturer.
- The use of a DPP service provider is however mandatory to store back-up copies of the DPPs (system put in place in case the manufacturer would cease his activities)
- **Retention time:** 10 years after placing on the market



Implementing act – secondary legislation

- To be published by the Commission (timing TBC)
- Focuses on technical requirements linked to DPP
 - **Type of data carrier, layout of data carrier & its positioning**
 - **Technical elements of the passport for which defined *European or international standards are to be used***
 - *The actors who may access to the DPP data & to which data they can be granted access to*
 - *The actors who can create the DPP or **update the data in the DPP***



Clarifications from the IA will be essential to implement the DPP



Upcoming standards

DPP standardisation work is happening under **JTC24 (Joint Technical Committee)** within **CEN/CENELEC**, which is responsible for developing the DPP framework and system.



Horizontal

Standards are expected to be horizontal - not sector-specific.



Timeline

Due to be completed by end Q2 2026



prEN 18216- 2025-
Data exchange protocols



prEN 18222- 2025- APIs for the product passport lifecycle management & searchability



prEN 18219- 2025-
Unique Identifier



prEN 18223- 2025- System Interoperability



prEN 18220- 2025-
Data carrier



prEN 18246- 2025- Data Authentication, reliability, and integrity



prEN 18221- 2025-
Data storage, archiving, and data persistence



prEN 18239- 2025- DPP access right management, information system security, & confidentiality

Horizontal provisions – secondary legislation



Topic	Category
Requirements for DPP service providers, as well as a certification scheme to verify their compliance with such requirements where appropriate;	Delegated act
Procedures to issue and verify the digital credentials of economic operators and other relevant actors;	Implementing act
Requirements for the Central Registry → <u>launch of registry in July 2026</u>	Implementing act
Rules & procedures on the life cycle management of unique identifiers & data carriers .	Delegated act

Change management and update of a DPP




In which case should a new DPP be created and in which case can an existing DPP be updated?
→ Clarifications to be integrated in the Detergents Regulation secondary legislation



Example: the DPP should contain an image of the label of packaging of the product.

Should the look of the packaging change (without change of formulation), would this trigger the need to create a new DPP or can the image of the product be updated in the DPP already existing for this product ?

Secondary legislation

Topic	Category	Timing
 Digital product passport - Technical requirements for DPP (data carriers, standards, actors who can create, access and update the DPP)	Implementing act	Not specified
 Microorganisms - Risk assessment methodology for microbial cleaners	Delegated act	By 23 September 2028
Digital labelling – Specific requirements for digital labelling (IT solutions, which economic operators may use, and the alternative means for providing the information on the digital label)	Delegated act	By 1 October 2028
 Biodegradability - criteria and test methods for films and polymers within films	Delegated act	By 23 March 2029

THANK YOU!

