

# CESIO

## news



# 12

EUROPEAN COMMITTEE OF ORGANIC SURFACTANTS  
AND THEIR INTERMEDIATES

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## Foreword

CESIO has welcomed new members in 2008 both through national associations and Elementis (NL) PCC Rokita (PL) joined CESIO as associate members.

As you all know, the last 12 months have been extremely difficult for the Secretariat in terms of resources. K Skirda who had joined on 1/6/2007 left Cefic end of February 2008 and K McDonald, his APAG equivalent, joined IMO in September 2007. All these departures and the difficulty to find suitably experienced and knowledgeable successors led the Secretariat into refocusing its priorities on REACH related issues pending the replacement of the two counsellors.

Since then, Alain Bouvy joined the Secretariat on 11<sup>th</sup> February 2008 and Cédric Delveaux joined the Secretariat on 5<sup>th</sup> May 2008. In due time, Alain Bouvy will take over all TRA (technical and regulatory affairs) of APAG, CESIO, ECOSOL to optimise the workings and efficiency of the cluster set up four years ago. Cédric Delveaux will handle selected issues and CESIO Reach T.F. At the time of writing of this report, CESIO Executive Committee is still considering whether the Secretariat is adequately staffed to handle the future workload. This will be determined by the decisions which will be taken by CESIO Executive Committee in regard to future REACH activities and ERASM, including the widening of the scope to including Human Health.

CESIO has been very active during the past 12 months on activities surrounding the implementation of the Detergent Regulation and has prepared for the revision of the Detergent regulation by updating the Detergent Working Group on the work associated with the updating of ERASM report on anaerobic biodegradability. CESIO LLNA Task-Force has been extremely active and a member of the Task-Force will address this issue at CESIO 2008. A Mehling, Cognis, gave a presentation at SOT which was well received. CESIO REACH T.F. was set up to address all issues related to the implementation of REACH. Last but not least, Lucia Lentulus developed and coordinated the production of CESIO communication tools, information leaflets which will be made available to all at CESIO stand in Paris.

Future activities of CESIO will include implementation of REACH, GHS and revision of the Detergent Regulation in addition to progressing the LLNA Issue.

Communication remains a core priority of the Secretariat once the new team is fully operational.

Once again, we thank all those who actively contributing the CESIO working groups, task-forces including CESIO representation at Commission and other industry meetings.

**Ch De Cooman**  
Secretary General

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## CESIO 2008 Congress Ch. Séné

Every four years, CESIO organises a scientific World Congress. This year, ASPA, which represents the French surfactants producers, has the honour of organising the 7<sup>th</sup> World Surfactants Congress in Paris at the Palais des Congrès from 22 to 25 June 2008. More than 800 attendees are expected to attend CESIO 2008 Congress.



The congress has been organized around 5 different sessions covering Chemistry (Synthesis, Properties, Analysis), Marketing aspect, Consumer and Industrial & Institutional applications and Safety & Regulatory Affairs.

During three days of Congress, 100 speakers from Industry, Academia and Authorities will present their view on these five different topics and debate around the theme of the Congress “Surfactants, the key to your sustainable applications”. At the Poster session, more than 220 posters will be presented: five poster awards will reward the best in their fields. This Congress will lead to the publication of 62 full-size papers.

Human and Environmental Safety, International and European regulations are high on the agenda with a large section dedicated to REACH and its impact. Ecolabels and Market trends in the different world markets will be covered. Finally, attendees will have an opportunity to hear about green chemistry and innovation in their field of applications.

Five plenary sessions will provide an opportunity to hear from highly respected speakers from Industry and Academia. Bernard Brancq (CESIO and Congress President, SEPPIC) will give the 1<sup>st</sup> Plenary. Prof. Dominique Langevin, L’Oréal-Unesco Prize Laureate, will present her view. A round table has been organized to debate on “the Surfactants for the Future: From raw materials to sustainable and responsible uses”.

CESIO 2008 Congress is also a place to make business: for companies to advertise their products and meet their customers in the booth and hospitality section. Care has been taken to make the Congress attractive not only to the surfactant industry but also to their customers. Trade associations such as AISE, CESIO, CLER/ECOSOL and SDA will have a booth.

Finally, CESIO will present a satellite symposium on “CESIO, the voice of the surfactants industry in Europe”.

The Organizing Committee and ASPA would like to express their special thanks to the members of the five Programme Committees and Presidents of the Sessions for their commitment and time; and to CESIO & ECOSOL secretariat and National Association secretariats, CESIO TRA & EC, as well as to AISE and SDA secretariats and CESIO member companies for their support to make this 4 year event successful. We look forward meeting you in Paris !



## REACH

### D. Ross

Since the last CESIO News we have all been busy trying to keep up with the various technical guidance documents that have appeared to help industry through the regulation. At the time of writing this article the initial date for pre-registration had not arrived but industry had already been informed that the bulk up load facility for pre-registration will not be ready on June 1 and it will probably be another month before it will be functioning. Those wanting to have a very early pre-registration will have to be patient as they fill the pre-registration details on-line in IUCLID 5. Another development is the recent Annex V review guidance document that will shortly be discussed by the Competent Authorities Sub Group meeting, a potential implication could be that salts that are produced in-situ in a formulation would be exempt from registration.

In the last news letter you were informed that a number of surfactant families had been established and that lead companies had been assigned to these. Progress to complete sameness checks is slower than initially expected there have been a number of reasons for this but the major issue has been to get the information required to undertake the sameness check. Most pre-consortia have completed the data collection and are moving on to establishing the sub-groups with test Gap Analysis to follow shortly. The list of surfactant families and the number of companies active in each has been circulated to the National Associations. In establishing sameness and looking forward to registration there was a concern that consortia may need some guidance with the most appropriate analytical techniques. This has been resolved by asking the CESIO Analytical Task Force to advise on this issue. In addition to the work on pre-consortia a consortia agreement has been written which was recommended to the CESIO REACH Task Force at the last meeting, it is expected that this will be used by all the surfactant consortia also lead companies for the registration process have also been assigned. **It must be stressed to all companies that pre-registration of substances that are brought on to the EU market or manufactured in the EU must be completed by the company responsible for the substance by the end of November this year.**

Another task that has been completed is the compilation of a list of substance groups that is being handled by other CEFIC sub-groups, CESIO, APAG and ECOSOL. They all have interest in different surfactant substance groups, nearly 50 in total and this could increase depending on the outcome of Annex IV and Annex V.

## Globally Harmonised System of Classification and Labelling (GHS)

### C. Cornet

Two years was from the time that a full reference of the progress on the Globally Harmonised System of Classification and Labelling (GHS) was given in this forum. From that time and with the difficulties (less in this case) common on the approval of EU regulations, a formal proposal from the EU Commission has been published. It is expected that the final approval will be by June of this year. The current document is divided in three volumes, consisting in the core text (volume I) and 7 annexes (volume II and III). This full text can be downloaded from the Web at: [http://ec.europa.eu/enterprise/reach/ghs\\_en.htm](http://ec.europa.eu/enterprise/reach/ghs_en.htm).

Let's consider some relevant aspects.

### Time of Implementation

Being indicated the so call "building block" approach, EU Commission is thinking for a GHS implementation for supply and use. Meanwhile for implementation in transport, it is intended to update in 2009 in the framework of the Directives on Transport of Dangerous Goods, done already somehow the last 2007.

With a forecast of the political agreement on common position by the EU Council at the end of May 2008, it is expected that after June sessions of the EU Parliament the final approval will come before July 2008.

It is believed that on December 2010 labelling of all substances according to GHS becomes compulsory. From this, a transition period starts for mixtures when a dual possibility of classification will coexist. June 2015 should be the "switch-off" of existing EU C&L legislation for all chemical products. In addition to this, from the mandatory requirement to supply to ECHA the classification of all substances (not only those in the scope of REACH register), an open Data Base will be created at the EU level: Classification and Labelling Inventory. In fact REACH Regulation states that from 1<sup>st</sup> June 2008 companies can supply ECHA with C&L information of any material introduce into the market.

### Some Aspects on the New Classification Criteria

Annex VII (in Volume III) contains a "Translation Table from classification under Directive 67/548/EEC". This provides an option, although not always a simple equivalence could be considered. A not "simple equivalence" can be illustrated by the acute oral toxicity thresholds, being in both systems not totally equal: 200 g/kg in front of 300 g/kg, speaking on R22.

One of the key issues is the fact that R41 substances will be converted automatically in Class 1 of Eye irritation within

the GHS system. This provokes that those substances will be considered as Corrosive with the corresponding symbol. Moreover, any preparation containing such substance in a level of more than 3% (now is 10% for R41) will be classified as well as corrosive. In case a preparation is corrosive and is going for the consumer use, such preparation should use "child –resistant closures" and "tactile warning of danger". Think about of the consequences for cleansers or detergents because our R41 surfactants as the alkyl sulfate. One possible solution could be to find out specific concentration limits, although if this means further testing ethical troubles may be arisen.

When we consider the environmental chapter two aspects are remarkable. The first is the fact that according with the latest proposal, the 10 days window has to be taken into account for substances, including the "mixtures" like surfactants. Therefore some surfactants have to be classified as dangerous for the environment although they are readily biodegradable. CESIO and AISE are pushing for avoiding such situation.

The second remark on the environmental classification is some role of NOEC chronic values that have some implication on the classification. Depending on the NOEC value, a declassification could be achieved in some cases. I think that unless REACH dossier recompilation changes the situation, there are not too much NOEC's values for surfactants of medium or low volume.

It is expected at the time of writing this document (May 2008) the publication of the RIP 3.6 that surely will help all of us on the criteria interpretation.

### **CESIO Efforts for the Implementation**

CESIO TRA is starting to organise a way to help our industry to do the transition between both systems in the less burdensome way. The current CESIO guidelines for classification of surfactants on Human Health and Environment need a revision and a re-collection of safety information might be necessary. From here we ask all our members to organise their resources in order to be prepared for the collaboration of this task. Of course, part of this task could be done on the mark of REACH consortium, but for sure not all of this.

### **Final Remarks**

Other aspects have frequently been commented in different forums, as those with pragmatism implications. This refers for example to the MSDS that have been already suffered small changes or, and more important, GHS will imply a completely new system on R and S phrases and pictograms. One clear impact in our industry it will be the need to re-design our safety labels with the need to change colours from our current ones. One could think that this is a minor aspect and, although in some sense it is, it will provoke extra efforts for some people of our companies to achieve a practical and reliable solution.

Worth is to mention the impact on the downstream Directives and Regulations, the need of internal training or re-localisation of materials according to new scenario and other items. But it is more advisable to end this summary with the positive remark that all of this will, after some years, bring a big benefit of more common (harmonised) way of understanding the safety of our chemicals.

## Update on the Detergent Regulation with Regard to the Biodegradability of Surfactants, MSDS Compliance Statements and the Transmission of Information

M. E. Williams

### General

Regulation (EC) No. 648/2004 on detergents entered into force across the European Union on 8 October 2005 as described in detail in CESIO News 2005 (Issue no. 9). The implementation was facilitated by the CESIO Guidance Document which was made available to CESIO member companies only, as well as by additional CESIO and A.I.S.E. guidance documents, publicly available through the official EU website. The CESIO Read Across principle was accepted by the Commission and has been officially documented in the Tiered Approach Guidance Document as well as in a stand-alone “Read-Across Rules” document. All these documents have been published on the EU Commission official website [http://ec.europa.eu/enterprise/chemicals/legislation/detergents/index\\_en.htm](http://ec.europa.eu/enterprise/chemicals/legislation/detergents/index_en.htm).

The timeframe for requesting a derogation for non-complying surfactants placed on the market prior to 8 October 2005 came to an end on October 07 2007, as was described in more detail in CESIO News 2007 (Issue no. 11). New derogations may be applied for after this date but the particular surfactant may not be placed on the market as a detergent ingredient until the derogation has been granted.

### Communication of Compliance with the Regulation

Under the Regulation, there is an ongoing obligation for surfactant manufacturers to communicate efficiently on the compliance of their surfactant products.

The European Commission, Member States and stakeholders agreed at the ad hoc EU working group meeting of Oct. 08, 2004 (Brussels) that the material safety datasheet (MSDS) is the appropriate document for a smooth and consistent application of the regulation requirements on the “information to be provided by surfactant manufacturers” (art. 9(1) and 9(2)). A CESIO guideline with the recommended sentence and translations into different languages for the MSDS has been issued and is available on the EU Commission public website. CESIO strongly recommends using these standardized declarations in the MSDS document. CESIO members (as well as all surfactant manufacturers) are legally bound to ensure that all documents on biodegradability are available to substantiate the statement of compliance of the individual surfactants with the provisions of the Detergent Regulation.

After almost 2 years from its entry into force, one area of the Detergent Regulation that has emerged as apparently not being implemented in a fully satisfactory way is the transmission to the National Competent Authorities of the data supporting the biodegradability of a given surfactant following an official request. As reported in CESIO News no. 11, CESIO and AISE were committed to developing a more detailed guideline to help facilitate the communication process and improve the timescales involved. A joint A.I.S.E, CESIO, ECOSOL, and FECC guideline on the “Implementation of the Detergent Regulation with regard to the Biodegradability of Surfactants and Transmission of information for Surfactants Biodegradability” has now been finalised and shared with the European Commission. This document is also being distributed to members, national associations and posted on websites.

The new guideline describes the process that surfactant manufacturers, surfactant distributors and detergent manufacturers should follow to ensure a swift submission of the biodegradability data to the authorities when requested. Many of the points in the guideline build on two documents that have already been shared with the EU Detergents Working Group and have been posted on the European Commission website. Namely, the “CESIO guidance document on the Application of Article 9(2) about the evidence of Biodegradability for Regulation (EC) No 648/2004 on Detergents & Updating of MSDS documents” and The “A.I.S.E Guideline on Implementation of the Detergent Regulation – Biodegradability of Surfactants and Annex VII (Labelling and Ingredient Datasheet)”.

CESIO, ECOSOL, A.I.S.E and FECC are committed to making the new joint guideline available to all of their respective members as well as via public websites to non-members, recognising that the latter are more difficult to reach. CESIO, ECOSOL, A.I.S.E and FECC are therefore also encouraging the EU Commission and National Competent Authorities to make the guideline available via their relevant websites.

## Anaerobic Biodegradability

### C.-D. HAGER

CESIO, ECOSOL and ERASM had the opportunity to make a presentation at the EU Detergent Working Group meeting in December 2007 on the issue of the anaerobic biodegradability. The presentation was addressing recently conducted studies on the anaerobic biodegradability of surfactants. Information was also provided on the soil ecotoxicity and sludge risk assessment for LAS surfactant which significantly affects the risk assessment. The new information will be published in three peer reviewed articles already submitted to international journals.

Following new toxicity testing, the PNEC<sub>soil</sub> for LAS has been revised from 4.6 to 35 mg/kg due to new ecotoxicity data. Therefore, as the PEC/PNEC ratio decreased by a factor of 7, a significantly lower environmental risk is found for LAS in anaerobic sludge. The revised deterministic and probabilistic risk assessment (recently published in *Regulatory Toxicology and Pharmacology* 49 (2007) 245–259) shows no risk for LAS at all observed sludge levels, soil types and typical regulatory disposal scenarios. Consequently limit values for LAS in sludge are not deemed to be necessary.

The key conclusions of the presentation given by industry were also officially documented by the Commission:

(a) The risk assessment shows that environmental protection is ensured provided that readily biodegradable surfactants, as required by Regulation (EC) No 648/2004, are treated under aerobic conditions in waste water treatment plants. The detergent and surfactant industry agrees with the statement by SCHER that “the requirement for ready ultimate biodegradability under anaerobic conditions is not by itself considered an effective measure for environmental protection.”

(b) No correlation between (lack of) anaerobic biodegradability and environmental problems has been reported. Rapid aerobic biodegradation is what is important for ensuring no risk to the environment.

The Detergent & Surfactant Industry emphasized its commitment to a pro-active and in-depth research on the issue of anaerobic biodegradability of surfactants, and a transparent communication of its results. In this framework the amended ERASM review report on “The anaerobic Biodegradation of Surfactants” has recently been published (*Tenside Surf. Det.* 44 (2007) 6) and the review submitted to the Commission. Also the HERA LAS report has been updated accordingly and the amended release is publicly available through the internet (<http://www.heraproject.com/>).

The Commission welcomed the new information concerning the relevance of anaerobic biodegradability of surfactants and promised to forward the information (scientific publications, HERA reports) to SCHER for an opinion in time for the preparation of the Commission review on this issue by April of 2009.

## LLNA

C.-D. HAGER

### LLNA Test for the Identification of Skin-Sensitisation Hazards

The assessment of the potential for chemicals to cause allergic reactions is an important component of the safety testing of new and existing chemicals. Guinea pig tests have been the method of choice for the identification of skin-sensitisation hazards for approximately 70 years. The most frequently used guinea pig tests are the Draize (Draize, 1944) test, the Buehler test (Buehler, 1965) and the guinea pig maximization test (Magnusson and Kligman, 1970), the latter being probably the most widely used test, and they have been proven valuable for the identification of potential human skin sensitizers. In 2002 following almost 10 years of development the local lymph node assay (LLNA) in mice (Kimber and Weissenberger, 1989; Kimber, 1994) was introduced and agreed as OECD guideline (429) as a method to assess skin sensitising potential. Although the LLNA still is an animal test and the number of animals is not necessarily reduced, it is less stressful to the tested animals.

The validation of the assay included comparison of LLNA results for a number of chemicals mainly with data from MK guinea pig tests. Subsequently it was determined that the assay was as predictive as the guinea-pig tests and could serve as a 'stand-alone' assay for sensitisation. The LLNA test has gained much support from regulatory authorities such as the UK HSE who announced in 2002 that for all new substance notifications the LLNA would be the only accepted assay for skin sensitisation. Also under REACH the LLNA is the prescribed test for assessing the skin sensitising potential of chemicals. Only under exceptional circumstances other test methods are acceptable and require convincing scientific justification if conducted.

Although the LLNA gives reliable results for many substances, recent experience by Industry suggests it may overestimate or more rarely underestimate the sensitisation potential of some chemicals. Due to ethical aspects and animal welfare laws, comparative or repeated testing for regulatory purposes is generally not acceptable.

However, from literature and data generated by Industry there is evidence that for certain groups of substances testing using the LLNA can result in discordant results (e.g. false positive and false negative predictions). These limitations need also to be seen in the light of the limited amount of data on these substances available from validation studies.

Unexpected positive results were observed in LLNA tests performed with classes generally regarded to lack a substantial sensitization potential, e.g. surfactants, siloxanes and polyols. Most of these chemical classes were poorly represented in the original validation data set. Furthermore, discrepancies between other results obtained from guinea pig tests (GPTs), human experience and LLNAs were found. Conflicting results were also obtained with some aliphatic hydrocarbons, fatty alcohols and unsaturated fatty acids, also known to lack sensitizing potential. These results indicate that the LLNA has limitations that require improved characterisation and understanding. These uncertainties need to be fully addressed, as there is a risk that the REACH legislation may lead to misleading classification of substances based on false positive results. Therefore further research has been initiated by CESIO addressing potential limitations of the LLNA method for specific classes of substances and alternative endpoints.

## HERA

### J. Rosenblom

The Human and Environmental Risk Assessment (HERA) on ingredients of household cleaning products, a unique European partnership established in 1999 between the makers of household cleaning products (A.I.S.E.) and the chemical industry (Cefic) to which CESIO made a large contribution is slowly coming to an end. Detailed information and reports on the HERA Risk Assessment program for surfactants is available on [www.heraproject.com](http://www.heraproject.com).

With the exception of the ongoing Risk Assessments of three surfactants still to be finalized, future activities of HERA will be focused around communication.

Completed HERA Risk Assessments on Surfactants	Date of Publication
Alcohol Ethoxysulphates	Feb. 2003 & June 2004
Alkyl Sulphate	March 2002 & Dec. 2002
Cocamidopropyl Betaine (Human Health section only)	July 2005
Hydrotropes	September 2005
Linear Alkylbenzene Sulphonate (LAS)	November 2007 (update*)
Secondary Alkane Sulfonate (SAS)	April 2005
Alcohol Ethoxylates	August 2007
Pending HERA Risk Assessments	Estimated Date of Publication
Amine Oxides	End 2008
Cocamidopropyl Betaine	End 2008 – 2009
Ester Quats	End 2008

\*) The updated version 3.0 of the LAS HERA risk assessment report incorporates new data about the terrestrial risk assessment of LAS developed mainly at DMU laboratories (DK). The new data have been used to estimate the amended PNEC in soil. Therefore, as the PEC/PNEC ratio decreased by a factor of 7, a significantly lower environmental risk is found for LAS in anaerobic sludge. No modifications have been made in the Human safety part of the report.

## ERASM

### K. Schwarz

ERASM, Environmental Risk Assessment and Management, is the joint research platform between detergents and surfactant manufactures represented by their associations AISE and CESIO. ERASM's objective is to improve and enlarge the scientific basis for and the knowledge about risk assessment of detergent-based surfactants in the environment. Founded in 1991, ERASM is a successful pioneer of a scientific based supply chain cooperation.

### A Look Behind: Selected Achievement from Last Year

#### Anaerobic Biodegradation

A review report on the status and relevance of the anaerobic biodegradation of surfactants has been updated and published in Tenside (Tenside Surf. Det. 44 (2007) 6). This report confirmed the overall conclusion that if surfactants are rapidly biodegradable under aerobic conditions, the anaerobic biodegradation of surfactants is of minor importance. Thus this publication is a building block in the communication and discussion with the EU commission in the framework of the Detergent Directive.

#### Sediment Risk Assessment

A four year PhD work initiated and financed by ERASM was successfully finalised in March 2008. This intensive research gave insights in key sediment characteristics and other conditions that affect the bioavailability of surfactants to marine benthic organisms. It could be demonstrated that the bioavailability in field sediments will likely be much lower than in sediment toxicity test. Shown with a non-ionic model surfactant, the sediment toxicity is mainly driven by the freely dissolved concentration of the pore water and not by the substance concentration in the sediments. These findings will be incorporated in a recommendation for sediments test methodology for surfactants.



### Monitoring Base Surfactants

A monitoring database for surfactants was designed. Aim of this finalised project was the collection of most important industry and third-party studies on anionic, non-ionic, cationic and amphoteric surfactants in the European environment. The development of a specific quality rating system for monitoring data helps to evaluate the existing data.

We expect that this project will be very helpful for future ERASM work by creating a legacy of its work (e.g. for use in risk assessment, trend analysis, HERA project, etc.), as well by demonstrating leadership of the detergent industry in providing transparent information to external stakeholders.

### A Look Ahead: Future Activities

Future activities of ERASM will focus specifically on recent challenges of the chemical industry. Here ERASM will be active in identifying open and rising issues for surfactant industries which need to be solved on a scientific basis. Furthermore it is recommended by the ERASM Steering Committee to widen the scope of ERASM to human health issues.

### REACH

Method development for REACH endpoints will include

- Sediment environments
- Marine environments
- Bioaccumulation.

This will have impact for the risk assessments under REACH and possible risk reduction measures.

### GHS

The impact on classification and labelling will be another focus of future ERASM projects. Surfactant specifics e.g. for sensitisation, eye irritation and for the PBT classification will be part of the activities.

## CESIO Analytical Task Force, REACH Implementation and CEN Standardization

Ch. Séné

The mission of the CESIO Analytical Task Force is to provide CESIO with support and expertise in the field of analytical chemistry, analysis and test methodology. As part of this mission, the TF provides expert support to the CEN Standardisation.

CESIO has been involved in harmonization of analytical procedures for the last two decades. The last step in harmonisation is CEN\* standardisation (\*European Committee for Standardization) which is only initiated when it is deemed valuable for industry. This decision is reviewed and finally approved by CESIO TRA Committee under proposal of the CESIO Analytical TF.

The Secretariat of CEN/TC276 is currently with AFNOR (France). Christophe Séné (Stepan) is Chairman of CEN/TC 276. CEN/TC276 is made of two Working Groups: WG-1 'Analysis' (Convener: Reinhard Gerhards (Evonik)) and WG-2 'Test method' (Convener: Rainer Traber (Ciba Specialty Chemicals)). Progress in current CEN projects is steady, but no new proposal for CEN harmonisation has been made in 2008 by WG-1 and WG-2.

The CESIO Analytical TF has been called to evaluate the impact of REACH on the need for analytical procedures and indirectly on the better knowledge on the composition of surfactant products required by REACH.

REACH legal text and RIP 3.10. call for a better compositional information on substances (main constituent, impurities and by-products) either for the identification section of the CSR dossier or for the conduct of the Risk Assessment. The CESIO Analytical TF has been working closely with the CESIO REACH TF on REACH implementation. The newly initiated work of the CESIO Analytical TF aims (i) to evaluate the status of analytical descriptors for each substance family then (ii) to identify missing methods or methods open to improvement, (iii) to propose way forward (development of a new method, better industry harmonisation...) and (iv) after approval of the Cesio REACH TF and lead company to initiate some experimental work (round robin...). Reinhard Gerhards (Evonik) is chairman of the CESIO Analytical TF and Christophe Séné (Stepan) is rapporteur at the CESIO REACH TF. Several areas for which analytical method development will be required have been recently identified by the CESIO Analytical TF. It is obvious that the harmonized approach to analytical methodology initiated by CESIO will save cost to industry and improve acceptance by the authorities.

## Ecolabelling

### Ch. Séné

In early 2007 a public Consultation to which CESIO participated has been conducted by the European Commission to evaluate the need for modernisation of the EU Ecolabel scheme. A report summarizing the results of this public consultation has been published; however this report does not indicate the way the EU Commission wish to move forward.

The periodic review of the existing EU Ecolabel scheme is suspended since the end of 2006 awaiting the Revision of the EU Ecolabel Scheme: the Detergent and Cosmetics EU Ecolabels have not been revised since 2007.

Ecolabelling either at EU level (EU Ecolabel, AISE Charter of Sustainable Cleaning...), National level (Nordic Swan, NF, Ecocert, Blue angel...) or in the USA remains very dynamic. Consumer demand for products with Ecolabel logos and consumer trends in green products or green services explain the dynamism of ecolabelling of surfactant-based products. In Europe, REACH represents a challenge to Ecolabel schemes that will probably need to adapt their criteria to remain valuable for the market.

## CESIO Surfactants' Statistics

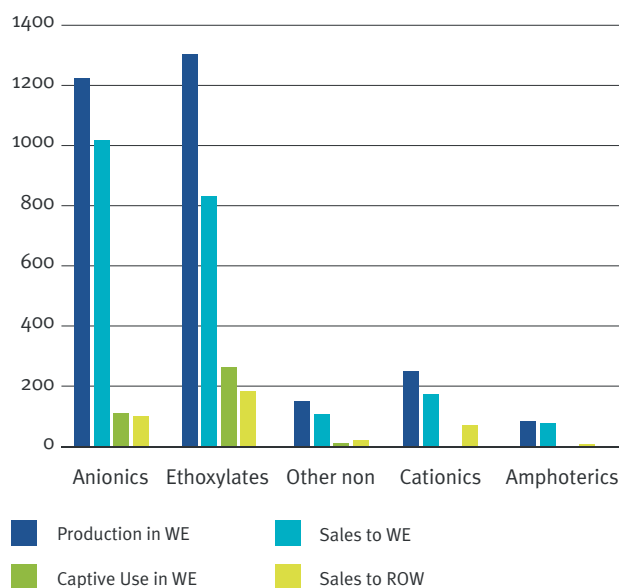
### C.-D. Hager

Over the course of the years the CESIO surfactants statistical survey have made considerable progress. For the calendar year 2007 29 Western European companies, representing more than 90% of the European surfactants market, submitted confidentially their data to the Cefic statistics department. The aggregated data show now a good, reliable summary of the European surfactants market.

A very brief summary of the surfactants statistics is shown below. The much more detailed summary containing the breakdown by surfactants groups will be made available to those member companies only, which have actively contributed to the survey.

The data below cover the period 2007 and reflect volume expressed as 100% active substances.

### Surfactants 2007: 3.00 mio tons



## US-trends

B. Sansoni

### Soap and Detergent Association (SDA) Update – May 2008

#### SDA Submits Key HPV Chemical Safety Data on LAS/ABS Substances, Aluminium Alkoxides to EPA

Detailed summaries of human health and environmental studies on Linear Alkylbenzene Sulfonates and Alkyl Benzene Sulfonates (LAS/ABS) are now in the hands of the U.S. Environmental Protection Agency (EPA), thanks to the work of SDA's LAS/ABS Consortium.

Robust study summaries containing data on the safety of nine chemicals were submitted 11 April, 2008 as part of SDA's submission of a revised test plan under the EPA's voluntary HPV Chemical Challenge Program.

In all, 196 robust summaries were prepared from existing data on the surfactants, which was shared and reviewed by experts around the world. The Consortium concluded that, based on the availability of data and the limited exposure potential, the LAS/ABS substances covered in this assessment should be considered to be of low concern and no further testing is necessary.

SDA has also given EPA safety data on aluminum alkoxides, which are used predominantly as intermediates in alcohol production. SDA's data shows that the alcohols have low toxicity to human health.

SDA's Aluminum Alkoxides Consortium submitted detailed information for 17 substances – gleaned from more than 1,000 robust summaries of data – in an initial test plan submitted to the EPA on 18 April, 2008, also as part of the EPA's voluntary HPV Chemical Challenge Program.

SDA noted that monitoring data show that exposures are likely to be low. Given the use pattern for these chemicals as manufacturing intermediates, environmental exposures are not expected. Alumina or aluminum oxide is present as a relatively low percentage of these products. It is a naturally occurring material and has low toxicity.

SDA concluded that, based on the availability of data and the limited exposure potential, the aluminum alkoxides covered in this assessment should be considered to be of low concern and no further testing is necessary.

#### New Report Highlights Successes of SDA HPV Work

Ten consortia, 62 companies, 289 chemicals, and over 6,000 data summaries. This brief description is shorthand for a decade-long, comprehensive effort by SDA to bring companies together to compile baseline data sets of health and environmental effects of High Production Volume (HPV) chemicals.

A new progress report summarizing the work of SDA's HPV consortia is now available on SDA's website, at [www.sdahq.org/environment](http://www.sdahq.org/environment).

“Through the global collaboration of producers and users of cleaning product chemicals, data submissions under these programs demonstrate that a wealth of environmental and human safety information has been in existence for cleaning product ingredients, virtually eliminating any need for new testing and dispelling the perception that fundamental safety data were lacking on these materials,” the report says.

Although the efforts to compile hazard data on a global basis required additional time and resources, there has been only a very limited need for new testing in this work. Only eight of approximately 6,000 study summaries were based on new testing (about 0.13% of the total number of studies). Thus, the going-in objective of minimizing the use of animal testing was achieved by broadly reaching out to companies in the U.S. and beyond that held relevant data sets.

SDA consortia have also been leaders in developing approaches for carrying out this type of work, including tools for using data within categories of chemicals to fill information gaps and methods for assessing the human and environmental risks of these chemicals when used in consumer products.

### SDA Unveils [AgainstDisease.com](http://AgainstDisease.com), Hosts New Book Detailing Public Health Benefits of Cleaning and Hygiene

SDA has unveiled [AgainstDisease.com](http://AgainstDisease.com), which houses a new publication that describes the historic and present-day impact of hygiene and cleaning on public health.

*Against Disease: The Impact of Hygiene and Cleanliness on Health* is an update of the 1984 SDA publication, *Cleanliness and the Health Revolution*. The new book is authored by Dr. Allison Aiello of the University of Michigan School of Public Health; Dr. Elaine Larson of Columbia University; and Richard Sedlak, SDA Senior Vice President, Technical & International Affairs.

*Against Disease* examines the historical scientific record on the role of sanitation, medical advances, and personal hygiene and cleanliness in reducing the incidence of disease-related morbidity and mortality.

“Too often, the positive contributions of hygiene and cleaning to public health are downplayed or forgotten, said SDA’s Rich Sedlak. “To help spread the word about the connection between hygiene and health, SDA is making *Against Disease* available for download at no cost on [AgainstDisease.com](http://AgainstDisease.com).”

A hardbound version of the book is also available for purchase on [AgainstDisease.com](http://AgainstDisease.com).

*Against Disease* recounts that a substantial, but overlooked component of the health revolution in the late 18<sup>th</sup> and early 19<sup>th</sup> centuries was a socio-cultural transformation in personal hygiene and cleanliness. The book examines records of soap production and consumption, bathing and hygiene habits, epidemiological data, and morbidity and mortality data from not only the United States and England, but also other areas of the world to support this hypothesis.

“Today, the health revolution is still ongoing in the form of personal hygiene and household cleanliness — two important disease prevention strategies,” the authors write. “This book includes an examination of the effectiveness of handwashing and household cleaning and disinfecting practices today in removing and killing microbes.”

“This fact is clear: good personal and household hygiene practices, although often overlooked in the past, remain vital contributors to good health.”

### SDA: Green Chemistry Initiative Shouldn’t Lead to Arbitrary Taxes, Ingredient Bans

Arbitrarily taxing chemicals produced, used or distributed in California could lead to negative environmental, economic or social impacts, said SDA in responses to questions related to the state’s Green Chemistry Initiative.

Rather than taxing “hazardous” chemicals, as implied in one of the questions asked by the State Department of Toxic Substances Control (DTSC), SDA told the State that it should undertake a categorization and prioritization exercise to identify those chemicals that are of the highest concern in California. Then the State should focus its efforts on scientific discovery, commercialization and dissemination of knowledge about alternatives through its Green Chemistry program.

In SDA’s letter responding to the State’s questions, Paul DeLeo, SDA Director of Environmental Safety, warned that manipulation of the market in favor of a chemical with a more favorable hazard profile but inferior performance might lead to greater overall harm due to the need to use more, which would increase exposure.

The SDA letter also pointed out that elimination of safe but affordable products from the market through tax policies might deprive low-income families or cost-sensitive companies of the benefits of such products, and force them to use more expensive alternative products.

SDA also told DTSC that:

- The most likely impediments to the adoption of alternative chemicals with more favorable environmental and human health profiles are inferior performance and greater costs of reformulation and conversion within facilities and supply chains, and for the material itself. It will be important for alternatives to be evaluated for their life-cycle impacts compared to existing chemicals.
- The State should not discriminate against specific ingredients, products and product categories based other than on sound scientific principles.

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- A workable ingredient communication program should include ingredient chemical names while providing flexibility as to the naming system and the media that are used for listing these ingredients. Any system for the disclosure of ingredients must be sensitive to the manufacturers' need to protect their proprietary information.
  - The state should avoid mandates requiring reusable or biodegradable non-petroleum based packaging, noting that there is no environmental or human health benefit to "natural sourced" (non-petroleum based) plastics over petroleum based plastics. SDA added that manipulation of commodity markets to require natural-based content in fuels and other products leads to greater negative impacts on climate change by fallow land being put into production, and increased food prices through diversion of food crops to fuels and materials.

Through public meetings and website blogs, DTSC continues to gather public input on its Green Chemistry Initiative, aimed at reducing the "impact of toxic chemicals on public health and the environment."



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Cefic, the European Chemical Industry Council, is the Brussels-based organisation representing national chemical federations and chemical companies of Europe. All together, Cefic represents, directly or indirectly, about 30,000 large, medium and small chemical companies in Europe, which employ about 2 million people and account for more than 30% of world chemicals production.

CESIO (Comité Européen des Agents de Surface et de leurs Intermédiaires Organiques) is the Cefic sector group representing the European producers of surfactants. The aim of CESIO is to develop and promote surfactants, keeping in mind environment and health.