Summary

Following a number of accidental ingestion incidents with these products, especially by young children, A.I.S.E. has established a voluntary product stewardship programme (PSP) for liquid laundry detergent capsules. This programme aims to ensure safe use of this particular product form, to be achieved through consumer education (on-pack labelling as well as communication campaigns) and through packaging modifications (reduced visibility of capsules and restricted access to the capsules by small children). In addition, there will be collaboration with Poison Control Centres (PCCs) to enable better information exchange (including a harmonised product information sheet) and monitoring of accidents.

The programme was rolled out on December 15th, 2012. To date five companies have subscribed (Henkel, McBride, Procter & Gamble, Reckitt Benckiser, Unilever), and have started to implement risk reduction measures. Although it is too early to quantify the effects of the programme, a favourable trend is already observed in Italy (where a number of measures have been introduced to the market since mid 2012 and further since December 2012).

Background

Liquid laundry detergent capsules are a relatively recent product innovation. This detergent form has been progressively introduced on the European market over the last decade. Today, liquid laundry detergent capsules are used daily by millions of people across Europe. Consumers experience the convenience of liquid laundry detergent capsules as their primary benefit. First, thanks to the unit dose concept, dosing correctly is effortless (one unit dose per wash load, no wrap to remove) and free of any mess due to spilling. Second, thanks to the high degree of concentration, less weight has to be carried when shopping (over 50% less when compared to concentrated liquids or powders). Also the smaller size implies that less space is taken in the laundry room for storage of the product. An equally important benefit of liquid laundry detergent capsules is their environmental sustainability profile. The lower weight and smaller size of the products allow use of less packaging material per laundry job. Further, the transportation emissions per unit can be substantially reduced compared to traditional product forms.

Whilst liquid laundry detergent capsules are safe when used as instructed, they can cause concern when handled inappropriately. Especially, when small children get access to liquid laundry detergent capsules and put them into their mouth, the liquid laundry detergent capsule’s pouch dissolves upon contact with saliva. This is because these pouches are designed to readily dissolve once in contact with water in the washing machine. Consequently, the concentrated detergent chemistry can be ingested – which may lead to nausea and vomiting, or worse, respiratory effects.

The number of accidental ingestion exposures reported for liquid laundry detergent capsules has been relatively higher than for other laundry product form when taking into account the market size of this product category. Further, a limited number of incidents with severe but reversible effects have occurred. To address this situation, the Detergent Industry, under the umbrella of A.I.S.E., has established a voluntary Product Stewardship Programme for liquid laundry detergent capsules. This aims to better educate consumers on how liquid laundry detergent capsules should be safely used and stored, and to reduce the visibility of liquid laundry detergent capsules and accessibility of

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1 This report was amended on October 22, 2013, to replace any product designations that are registered trade marks by the generic term “liquid laundry detergent capsules”.

A.I.S.E. PRODUCT STEWARDSHIP PROGRAMME FOR LIQUID LAUNDRY DETERGENT CAPSULES

Status Report – April 10, 2013

A.I.S.E. Product Stewardship Programme for Liquid Laundry Detergent Capsules – Status Report April 2013
the product to small children. This will be achieved by communication activities, and by modifications to the product (labels, packaging).

**Liquid laundry detergent capsules**

**History of the product category**

Single-dose concentrated laundry detergents were first developed and placed on the market in the United States in the 1960s, however without much success. In Europe, laundry tablets have been sold since the mid eighties (Spain). Only by the end of the nineties, primarily in the UK, unit dose laundry started to get a meaningful presence in the market. Back then, powder was by far the main laundry product form in Europe. Hence, the focus in single-dose detergents was on dry powder laundry tablets.

In 2001, soluble pouches containing concentrated liquid detergent first appeared on the market. Initially this remained a fairly small niche product category. However, with the detergent market gradually shifting more towards liquids, and as the technology to concentrate liquid detergents progressed, liquid laundry detergent capsule have since become the primary product form for single-dose laundry. These products are known as gel capsules, gel caps, liquitabs, liquid sachets, etc.

Today, the largest market for liquid laundry detergent capsules is the UK and Ireland. Other important markets are France and, more recently, Italy. In most other Western European countries (excluding some, e.g. Sweden), as well as several countries in Central Europe, liquid laundry detergent capsules are also on the market - but represent a much smaller volume compared to the traditional laundry product forms. Over the past years, the importance of the liquid laundry detergent capsules from has been growing, as more consumers switch to unit dose laundry. In addition to detergents, some laundry additives are also available in the liquid laundry detergent capsules form.

**Chemical product description**

Liquid laundry detergent capsules are essentially water-free, solvent-based formulations containing high levels of surfactants (anionic as well as nonionic) and soap. Typically the combined level of surfactants and soap can reach 40% or more. Solvents typically used in these formulations are propylene glycol (up to 20%) and ethanol (up to 5%). In addition, liquid laundry detergent capsules contain the other ingredients normally used in liquid detergents – such as enzymes, polymers, phosphonates, perfumes, colorants. The formulas have a neutral to slightly alkaline pH (7-9). The detergent chemistry is contained within a pouch made of a water-soluble polymer (typically poly vinyl alcohol, PVA). This film is mechanically strong and flexible, and remains intact during dry storage - but that readily dissolves in the washing machine as the washing cycle starts, and degrades in the environment.

**Accidental ingestion**

**Evolution of number of accidents**

While liquid laundry detergent capsules are mechanically strong when dry, they can release their contents prematurely when they come into contact with moisture (e.g. saliva, wet hands). Since this product form has appeared on the market in 2001, occasional incidents of accidental exposure (either ingestion, or splashes into the eyes) have been reported to Poisons Control Centres (PCCs). As the market for liquid laundry detergent capsules has matured and grown, the number of such incidents has increased and has become higher than expected based on the market size of the liquid laundry detergent capsules category.

In the United Kingdom, since 2008, the National Poisons Information Service (NPIS) has received about 500 enquiries per year regarding accidental exposure to liquid laundry detergent capsules. It should be noted that these are only enquiries by medical professionals (not consumers).

In France, the Lille PCC counted over 400 accidental exposures in its regional area (either PCC calls or incidents tracked via emergency departments), between 2001 and 2006.

In Italy, since the fall of 2010 (following the Italian launch of liquid laundry detergent capsules earlier that year) the Milan PCC (Niguarda) has being receiving about 500 reports annually of accidents with liquid laundry detergent capsules for its territory. This represents about half of the total number of enquiries related to laundry detergents – i.e. 5-6 times more incident reports for liquid laundry detergent capsules than would be expected based on this product form’s market presence (which is 9% of the laundry detergent category in Italy).
A common element across these three countries is that in a large majority of the accidents, children (mainly between 3-5 years old) are involved (at least 80% of the cases, and even up to >95%). Also, most exposures for which PCC help was sought involve ingestion of the product (about 90% of the cases; either ingestion alone or in combination with other routes of exposure).

A clear increase of these cases is seen as liquid laundry detergent capsules are launched and gain market share – for example as could be observed in Italy the second half of 2010. Where the markets are stable (e.g. the UK over the past several years; Italy since mid 2011) the frequency of incidents seems to stabilise or go down.

**Typical accident circumstances**

Ingestion of liquid laundry detergent liquid laundry detergent capsules does not happen in a normal use situation, i.e. in accordance to the instructions of the manufacturer. Normally, unlike with traditional detergent forms, there is no consumer exposure at all to the detergent. This is because the formulation is contained in a sealed pouch that only dissolves in the washing machine, once the laundry cycle has started. When the pouches are handled with wet hands they might partially dissolve or swell during the handling, leading to skin exposure. Skin or eye exposure also might occur in case the liquid laundry detergent capsules are manipulated too forcefully, or are cut or pierced, and subsequently the detergent is released or is squeezed out. Still this would not lead to ingestion.

However, when young children get access to liquid laundry detergent capsules, they may be intrigued by the product and be tempted to put it into their mouth. This is a natural behaviour for small children, until the oral stage subsides considerably around 3-4 years old. Hence, the typical ingestion accident with liquid laundry detergent capsules is when a toddler discovers the product, has access to it, and enters it into the mouth.

As with other detergent products, elderly people suffering from dementia may also be at risk for accidental ingestion. They do not recognize the product as a laundry detergent, as this product form did not exist when they were younger. Compared to children, by these people higher amounts of product might be ingested – as they can physically swallow a higher amount, and as their reflexes to indicate that something is wrong may be impaired.

**Symptoms and treatment**

If an amount of product is ingested, this is likely to trigger an emetic reaction. In about two-thirds of the accidental ingestions mentioned above, the patients suffered from nausea or vomiting. Whereas this does lead to substantial discomfort, it will normally not cause anything beyond a mild irritation of the oral mucosa and potentially the esophagus. However, more concerning is when the product and/or gastric fluids are aspirated into the lungs during the emetic reaction. In case larger quantities were ingested, the likelihood for aspiration increases, due to the formation of foam. Such aspiration may cause chemical pneumonitis, requiring emergency treatment.

Respiratory effects were observed following 5-15% of the cases. Fortunately, for the vast majority these effects were not severe, but limited to coughing. However, in about 0.5% of the ingestion cases, the highest severity score was reported, and/or the patient had to be hospitalized in an emergency department (e.g. requiring intubation to address a severe respiratory condition).

Based on the oral toxicity of the ingredients, and the limited amounts that can be ingested, acute oral toxic effects are not anticipated. Still, in 2-4% of the cases mentioned above, drowsiness was reported, and there was one case of temporary but severe central nervous system suppression associated with the incident.

Ingestion of the liquid laundry detergent capsules did not lead to symptoms in about one-third of the total number of ingestion cases mentioned above. Indeed, when only a small quantity of product enters into the mouth, and most is immediately spit out as a reflex against the unpleasant taste, this would not lead to substantial discomfort, and further treatment would not be required.
A.I.S.E. Voluntary Product Stewardship Programme (PSP)

The Programme

The A.I.S.E. membership has been made aware by Poison Control Centres (PCCs) that in some countries incidents of accidental exposure involving small children have been observed, mainly of ingestion but also eye injury. The issue is fundamentally one of unintended use and, in newer markets, lack of familiarity. Against this background, and with the support of the industry, A.I.S.E. has developed the voluntary Liquid Laundry Detergent Capsules Product Stewardship Programme outlined below.

The Product Stewardship Programme for Liquid Laundry Detergent Capsules is a new voluntary initiative of A.I.S.E., the International Association for Soaps, Detergents and Maintenance Products. This Programme builds on a series of voluntary initiatives already undertaken by A.I.S.E. in the domain of safety and sustainability.

A.I.S.E. and its member companies involved in the liquid laundry detergent capsules market in Europe regard the safety of consumers as a top priority. Whilst safe use and storage of any detergent or maintenance product should be promoted, this Programme aims at securing safe use and storage of liquid laundry detergent capsules by consumers to ultimately significantly reduce the incidence of accidental exposure, in particular of small children, to these products.

This A.I.S.E. Product Stewardship Programme (PSP) is open to any company manufacturing and/or placing liquid laundry detergent capsules on the European market (EU + Iceland, Switzerland, Norway and Liechtenstein), regardless of whether these companies are member of A.I.S.E. and/or its National Association members.

The Commitment

Companies participating in the A.I.S.E. Liquid Laundry Detergent Capsules Product Stewardship Programme commit to apply the following, specifically developed, set of rules:

Product

Participating companies commit to implement safety measures to reduce visibility of and restrict access to liquid laundry detergent capsules.

- Reduced visibility of capsules. Participating companies shall implement one of the following measures to reduce the visibility of the liquid laundry detergent capsules: either opaque packaging; OR obscure packaging; OR any equivalent.

- Restricted access to capsules by small children. To address accessibility to liquid laundry detergent capsules, companies shall implement a pack closure which discourages, delays or otherwise impedes the ability of small children to open the pack, the precise design being for companies to decide. For example, restricted access may be achieved through pack closures that necessitate either strength, or co-ordinated movements, or the use of two hands in order to be opened. This list of examples is non-exhaustive and indicative only.

Product Information & Communication

Participating companies commit to reinforce guidance on the safe use and storage of liquid laundry detergent capsules.

- On-pack communication. Participating companies shall make use of the A.I.S.E. Safe Use Icons, such as “Keep away from children” and in particular of the icons specifically developed for liquid laundry detergent capsules such as “Close the lid properly”, “Close the bag properly”, “Use with dry hands”, “Do not pierce, break or cut”. Use of the Safe Use Icons shall be made in accordance with the A.I.S.E. Safe Use Icons Guidelines for on pack use available at www.aise.eu/end_user_info. The A.I.S.E. Safe Use Icons of particular relevance for this product category are provided in Annex 1 Part 1 of this document. In addition, companies shall clearly display on-pack a Safe Use Patch in accordance with the specifications laid down in Annex 1 Part 2.

- Consumer communication campaign. Participating companies shall take part in communication activities across the EU to further enhance consumer awareness about safe use and storage of liquid laundry detergent capsules. Template leaflets, web-banners and other similar materials are made available by A.I.S.E. and its network to the participating companies.

- Communication activities reporting. Companies shall report to A.I.S.E. on the consumer communication activities carried out in the framework of this PSP. Reporting shall also indicate the selection of Safe Use Icons
used on-pack. Reporting should be completed 12 and 24 months following subscription to the PSP, and when placing liquid laundry detergent capsules on new markets.

**Engagement with Poison Control Centres**

Participating companies commit to engage with Poison Control Centres, including the European Association of Poison Centres and Clinical Toxicologists, to enable better information exchange and monitoring of accidents.

- **Harmonised product information sheet.** Participating companies shall develop a harmonised product information sheet for notifying PCCs of new product launches and their product characteristics in advance to legal obligations (legal obligation as of June 2015).

- **Accidentology.** Given the current lack of understanding of the circumstances leading to incidents involving small children, companies, in cooperation with PCCs, shall develop a process to collect better information on incidents ('accidentology’) with a view to understanding whether the most effective measures are being taken to address the issue.

**Timing**

The A.I.S.E. Product Stewardship Programme for Liquid Laundry Detergent Capsules opens on 15 December 2012. As of this date companies will be allowed to sign in. By signing in companies commit to start implementation latest within 6 months upon signature, and to exhaust stocks of products that do not meet the requirements described in this PSP at company level latest within 12 months upon signature. Participating companies shall launch consumer communication activities within 3 months upon signature.

**Legal Requirements**

This Programme does not replace the legal requirements that companies are obliged to meet with regard to safety and human health, and in particular the provisions set in Directive 1999/45/EC on the classification, packaging and labelling of dangerous preparations; Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures; Directive 2001/95/EC on General Product Safety; Regulation (EC) 648/2004 on detergents.

This programme is a voluntary initiative in the field of health and safety to be carried out in compliance with competition law.
A.I.S.E. PSP Status – March 29, 2013

Companies participation

List of companies (in alphabetical order) committed to the A.I.S.E. Liquid Laundry Detergent Capsules Stewardship Programme (as of 15 December 2012 onwards):

<table>
<thead>
<tr>
<th>Companies</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Henkel</td>
<td>✔</td>
</tr>
<tr>
<td>McBride</td>
<td>✔</td>
</tr>
<tr>
<td>Procter &amp; Gamble</td>
<td>✔</td>
</tr>
<tr>
<td>Reckitt Benckiser</td>
<td>✔</td>
</tr>
<tr>
<td>Unilever</td>
<td>✔</td>
</tr>
</tbody>
</table>

PSP implementation

It should be noted that companies decide on an individual basis when to further implement PSP measures. Information regarding these plans cannot be collected and disclosed, as this would not be in line with competition law requirements. Hence, the below table only reports measures that have been implemented so far, and that are already present in the market.

<table>
<thead>
<tr>
<th>PACKAGING / PRODUCT</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Henkel</strong></td>
</tr>
<tr>
<td>December 2012</td>
</tr>
<tr>
<td>Austria, Turkey</td>
</tr>
<tr>
<td>Dixan (AU), Persil (TR)</td>
</tr>
<tr>
<td>Reinforced closure of Duo-Caps box</td>
</tr>
<tr>
<td><strong>Procter &amp; Gamble</strong></td>
</tr>
<tr>
<td>July 2012</td>
</tr>
<tr>
<td>Italy</td>
</tr>
<tr>
<td>All brands: Dash Ariel</td>
</tr>
<tr>
<td>Replaced transparent boxes by opaque boxes</td>
</tr>
<tr>
<td><strong>End March 2013</strong></td>
</tr>
<tr>
<td>Belgium, Bulgaria, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Greece, Hungary, Iceland, Ireland, Latvia, Luxembourg, Malta, Poland, Portugal, Romania, Slovak Republic, Slovenia, Spain, The Netherlands, UK</td>
</tr>
<tr>
<td>All brands: Dash, Bold, Daz, Fairy, Ace</td>
</tr>
<tr>
<td>Opaque packs available</td>
</tr>
<tr>
<td><strong>Unilever</strong></td>
</tr>
<tr>
<td>2011</td>
</tr>
<tr>
<td>Denmark, France, Greece, Ireland, Italy, Netherlands, Romania, Spain, UK</td>
</tr>
<tr>
<td>All brands: OMO, Persil, Skip, Via, Biotex, Cajoline, Surf, Robijn, Dero Surf</td>
</tr>
<tr>
<td>- Label enlarged to take up majority of tub to limit capsule visibility on shelf</td>
</tr>
<tr>
<td>- Front of pack of tubs has been made to look more technical versus child friendly</td>
</tr>
<tr>
<td>- Denatonium Benzoate included in formulation of capsules (Extremely bitter substance that repels ingestion)</td>
</tr>
</tbody>
</table>
## HAZARD LABELING

<table>
<thead>
<tr>
<th>Company</th>
<th>Date</th>
<th>Country</th>
<th>Brands</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Henkel</td>
<td>Mid-December 2012</td>
<td>Italy</td>
<td>All brands</td>
<td>Top lid label fully yellow with precautionary text and icons (+ re-stickering of the existing products in stock)</td>
</tr>
<tr>
<td>Procter &amp; Gamble</td>
<td>July 2012</td>
<td>Italy</td>
<td>All brands: Dash Ariel</td>
<td>Prominent Keep Away from Children icon on top of the pack (PSP safe-use patch not yet implemented)</td>
</tr>
<tr>
<td>Reckitt Benckiser</td>
<td>February 15 2013</td>
<td>Italy</td>
<td>All brands: Sole, Ava, Woolite, Vanish</td>
<td>Safe-use patch introduced on pack</td>
</tr>
<tr>
<td>Unilever</td>
<td>2012</td>
<td>Denmark, France, Greece, Ireland, Italy, Netherlands, Romania, Spain, UK</td>
<td>All brands: OMO, Persil, Skip, Via, Biotex, Cajoline, Surf, Coccolino, Robijn, Dero Surf</td>
<td>“Keep away from children logo” placed in multiple positions on pack (x3) including at the point of opening/closing, and enlarged on front of pack; safety icons on top of pack with yellow background</td>
</tr>
</tbody>
</table>

## COMMUNICATION

<table>
<thead>
<tr>
<th>Company</th>
<th>Date</th>
<th>Country</th>
<th>Brands</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Henkel</td>
<td>Mid-December 2012</td>
<td>Italy</td>
<td>N/A</td>
<td>Printed leaflets of the AISE instructions provided to the trade</td>
</tr>
<tr>
<td>Procter &amp; Gamble</td>
<td>July 2012</td>
<td>Italy</td>
<td>All brands: Dash Ariel</td>
<td>Print campaign, reinforcing the safe use of the products.</td>
</tr>
<tr>
<td></td>
<td>November 2012</td>
<td>UK</td>
<td>Not brand-specific (covers all P&amp;G fabric &amp; home carte brands)</td>
<td>Implemented educational safety campaign “Happy Home campaign” – mainly on-line</td>
</tr>
<tr>
<td></td>
<td>February 2013</td>
<td>Italy, Spain, France:</td>
<td>All brands: Dash Ariel</td>
<td>Reinfacing “Keep out of reach of children” message across communications touch points (like TV, print...)</td>
</tr>
<tr>
<td>Reckitt Benckiser</td>
<td>January 10 2013</td>
<td>Italy</td>
<td>Sole, Ava, Vanish</td>
<td>Safe-use banners introduced on Sole, Ava and Vanish websites</td>
</tr>
</tbody>
</table>
Harmonised composition sharing with PCCs

A.I.S.E. has developed a template for companies to share liquid laundry detergent capsules composition data with Poisons Control Centres in a harmonized way. This template is based on the proposed EAPCCT guidance (2010) for product composition sharing under the CLP regulation, and takes into account the most recent discussions between the different stakeholders in 2011 and 2012. Further, it is taken into account that data sharing should be initiated as soon as possible and as such, the format and content was targeted to be fully relevant for liquid laundry detergent capsules products, and implementable at short notice.

To note:

- It is recognised that the currently proposed data sharing format for liquid laundry detergent capsules will be obsoleted once final and formal guidelines are issued regarding data sharing under CLP.
- Where specific national requirements exist (either in terms of data to be shared, or in terms of formats or software to be used), these existing requirements prevail and should continue to be followed. If all elements of the PSP’s harmonised composition sharing are already included in the existing requirements, or if the existing approaches require more detailed disclosure (e.g. exact levels), then the PSP approach should not be used (i.e. no duplication of the submission). If, on the other hand, the PSP approach contains additional information beyond what is already required, this information should be provided either within the existing formats (if possible), or otherwise as separate information.

Product Identification

For the company and product identification, as well as the product and packaging description, EAPCCT 2010 guidelines are integrally followed, except regarding the artwork / label - which is excluded from the proposed approach due to the practical feasibility. For the section ‘toxicology’, the EAPCCT guidelines state that relevant information on the toxicity of the mixture is important for Poison Centres and should be provided according to the Regulation 1907/2006 on the Safety Data Sheet. Providing more detailed toxicological assessments beyond what is in the SDS is currently not proposed.

Composition

For the product composition, the 2010 EAPCCT guidelines, and further modifications to these guidelines as discussed in the context of CLP (European Commission stakeholder workshop on November 28-29 2012), are applied. Some additional modifications were made based on the need for short-term feasibility.

Different rules are applied to non-classified substances versus classified substances. Within the classified substances, a further differentiation is made between those considered to be of a high hazard and those not considered to be of high hazard. Substances considered to be of high hazard are those with either of the following classifications: acute toxicity (oral, dermal, inhalation), category 1, 2 and 3; STOT - single exposure, category 1 and 2; STOT - repeated exposure, category 1 and 2; skin corrosion, category 1A, 1B and 1C. Note that substances classified as ‘serious eye damage, category 1’ are not considered of high hazard for this purpose.

Ingredient disclosure

- Ingredients must be identified by their internationally accepted chemical names: in descending order of preference: the name as given in Part 3 of Annex VI of Regulation (EC) No 1272/2008; the name as given in the classification and labelling inventory (mentioned in Article 18(2) of Regulation (EC) No. 1272/2008); the name set out in the nomenclature provided by the IUPAC; another international chemical name.
- In addition, synonyms or common names shall be provided, as well as the CAS and EC number, if available.
- The functional group of each ingredient shall be provided.
- For each ingredient it shall be indicated whether it is classified, and if yes, the classification shall be included.
- If an ingredient is present in nano-form this shall be disclosed.
- For perfumes and dyes, the names “perfume” and “colouring agent” shall be used, instead of a more detailed disclosure.
- Enzymes shall be disclosed using the generic enzyme type (e.g. "protease", "lipase", ...) without further detail and without further disclosure of the enzyme raw material constituents.
- In the case of substances occurring in nature, a chemical name or chemical names of the type "essential oil of ..." or "extract of ..." may be used instead of the chemical names of the components of that essential oil or extract.

Reporting thresholds

- For non-classified substances, no notification is needed when present <1%.
- For classified ingredients that are not intentionally added, the reporting threshold is 0.1 %, unless the substance has a “specific concentration limit” (SCL) smaller than 0.1 % and is present above this SCL.
- For classified ingredients that are intentionally added, there is a need to report, irrespective of the level.

**Reporting of ingredient ranges**
- Ingredients are reported using ranges. The definition of the ranges is flexible (i.e. the width of the range is prescribed, but the choice of the lower and upper level is flexible).
- By default, a flexible concentration range is suggested such that the actual level is in the middle of the range (with rounding to 0, 1 or 2 decimal places depending on the values). However, it is allowed to define a different range as long as the absolute width of the range is not modified, and the actual level is within the range.
- To note: whereas the A.I.S.E. format does not require to include the actual level in the composition disclosure, Companies have the liberty to provide this information to the PCCs in addition to ranges.

<table>
<thead>
<tr>
<th>Non-classified substances</th>
<th>Classified substances</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>No high hazard</td>
</tr>
<tr>
<td>&gt; 40 - ≤ 100</td>
<td>&gt; 40 - ≤ 100</td>
</tr>
<tr>
<td></td>
<td>up to 20% points</td>
</tr>
<tr>
<td>&gt; 10 - ≤ 40</td>
<td>&gt; 10 - ≤ 40</td>
</tr>
<tr>
<td></td>
<td>up to 10% points</td>
</tr>
<tr>
<td>≥ 1 - ≤ 10</td>
<td>&gt; 1 - ≤ 10</td>
</tr>
<tr>
<td></td>
<td>up to 3% points</td>
</tr>
<tr>
<td></td>
<td>&gt; 0.1 - ≤ 1</td>
</tr>
<tr>
<td></td>
<td>up to 0.5% points</td>
</tr>
<tr>
<td>≤ 0.1 *</td>
<td>up to 0.1% points</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

* cf. reporting thresholds for classified ingredients

**Timing**

The harmonised format will be made available to the Companies on April 15, 2013, and shall be implemented (where relevant) for product notifications as of June 2013. National PCCs will be made aware via the national detergent associations before the end of May. The reporting format will also be shared with the EAPCCT for information. Feedback from the national PCCs and the EAPCCT will be sought during the second half of 2013, once they have been able to experience this new composition sharing approach in practice.

**Incident tracking with PCCs**

**Quantitative incident tracking**

For the countries in which liquid laundry detergent capsules have the largest presence, and consequently, where the highest number of accidental exposure incidents have been reported, A.I.S.E. is establishing a quantitative tracking of the evolution of the incident number as PSP measures are implemented. This exercise is being conducted in the UK, Ireland, France and Italy.

The quantitative tracking is based on the number of cases reported to PCCs. It is proposed that existing data reflecting the situation before the introduction of risk mitigation measures be used as a baseline. Data collected over 2013 (as PSP measures are phased in) will allow observing whether a downward trend is establishing itself. Finally, data collected by end 2013 (following full implementation of the PSP) should serve to assess the effectiveness of the measures in reducing the frequency of ingestion cases.

It is proposed that existing incident tracking processes be used. This way, it can be ensured that the data collection approach for 2013 is the same as the approach used to collect the historical data – i.e. covering the same scope in terms of enquiry types and in terms of geographical area.

The aim is to assess incident frequency both in absolute terms, as well as relative to potential developments in the liquid laundry detergent capsules market size.

**Accidentology**

To better understand the root causes of liquid laundry detergent capsules ingestion incidents, A.I.S.E. will collaborate with PCCs, to prospectively monitor accident circumstances. Together with the quantitative tracking mentioned higher, the qualitative “accidentology” monitoring will allow understanding whether and how the implementation of PSP measures effectively reduces the number liquid laundry detergent capsules ingestion incidents. Ultimately, this
will help evaluate which elements in the PSP are most effective, and will help define which of its elements may require improvement.

A.I.S.E. is currently exploring options for collaborating with EAPCCT on this matter, to coordinate the acquisition of accident circumstance information from national Poison Centres. This should be achieved via a short and targeted questionnaire, focusing on the exact product identity, the visibility of the product (e.g. opaque packaging or not), and the accessibility (where the product was stored; whether the child had opened the packaging; or in general how the child got access to the product).

**Initial observations (Italy)**

Since mid 2012, some of the transparent packaging has been replaced by opaque boxes. Further, since December 2012, additional safe use communication efforts are being made (e.g. label changes, leaflets). This has had a favourable impact on the number of incidents reported to the Niguarda PCC in Milan. Whereas the number of incidents reported to Niguarda was up to 2 per day in the first half of 2012, this has dropped to 1 per day by the end of 2012 (with largely similar sales volumes of liquid laundry detergent capsules over this period). A further reduction is observed for the first quarter of 2013, with just over 1 incident every other day in February. Importantly, only a minority of the reported incidents in February (about 10%) was with opaque packaging.
Annex 1

A.I.S.E. Safe Use Icons of relevance for liquid laundry detergent capsules and guidelines for implementation

PART ONE – Safe Use Icons of relevance for this product category:

A.I.S.E. has developed various voluntary safe use icons for use by industry. Those are available from www.aise.eu/end_user_info and a number of those are particularly relevant for this product category, in particular the ones presented below:

The Safe Use Icons Guidelines for on pack use are provided by A.I.S.E. under www.aise.eu/end_user_info.
PART TWO – Safe use patch for liquid laundry detergent capsules:

For the purpose of securing optimal guidance to the consumers on the safe use and storage of liquid laundry detergent capsules, the Safe Use Icons shall be presented in patches to be displayed on the outer packaging of the Products in accordance with the following requirements:

- **Patch – Safe Use Icons/size:**
  - Priority icons shall be featured in a patch and display on pack as follows:
    - ‘Keep away from children’
    - ‘Close the lid properly’ or ‘Close the bag properly’ (for doy bags)
    - Minimum size for each of these two icons: 20 x 20 mm
    - Those two icons should be accompanied with their respective text, adequately translated at a minimum size of 10 points (reference font: Futura Condensed).
    - Colour of the icons – same as in A.I.S.E. guidelines: black (if necessary, a dark colour may replace it – only dark blue in this context can apply).
  - Other relevant A.I.S.E. icons to be used on a voluntary basis on pack according to general A.I.S.E. guidelines. The Conditions of Use of the A.I.S.E. Safe Use Icons can be found on www.aise.eu/end_user_info.

- **Patch – other requirements:**
  - Have the general introduction sentence (or its corresponding translation provided by A.I.S.E.): “Handle and store safely” – Minimum size: 13 points (reference font: Futura Bold), preferably in capital letters.
  - © A.I.S.E. - www.cleanright.eu must be featured (minimum size: 10 points – reference font: Futura Condensed)
  - Recommended positioning of patch on packaging: on Top or Front of the pack. Excluded: underneath the pack. In any event, the patch should be readily seen by consumers.
  - Patch to be placed on pack (as per A.I.S.E. guidelines and models below) BUT with yellow background (reference colour recommended: yellow CMYK: 100%).
- Examples of patch layout:

Patch for boxes:

Patch for doy bags:

Other possible layout:

Bilingual example: