



# DetNet

**Detergent Industry Network for CLP Classification  
(skin and eye effects)**

*A.I.S.E. Information Day, 3 December 2013*

***Gerard Luijkx***

***Chair of A.I.S.E. CLP Strategy Group***

**[www.det-net.eu](http://www.det-net.eu)**

An A.I.S.E. initiative



<Det>

<Net>



# CLP for future mixture classification

## Classification Labelling & Packaging Regulation (CLP)



DPD/DSD

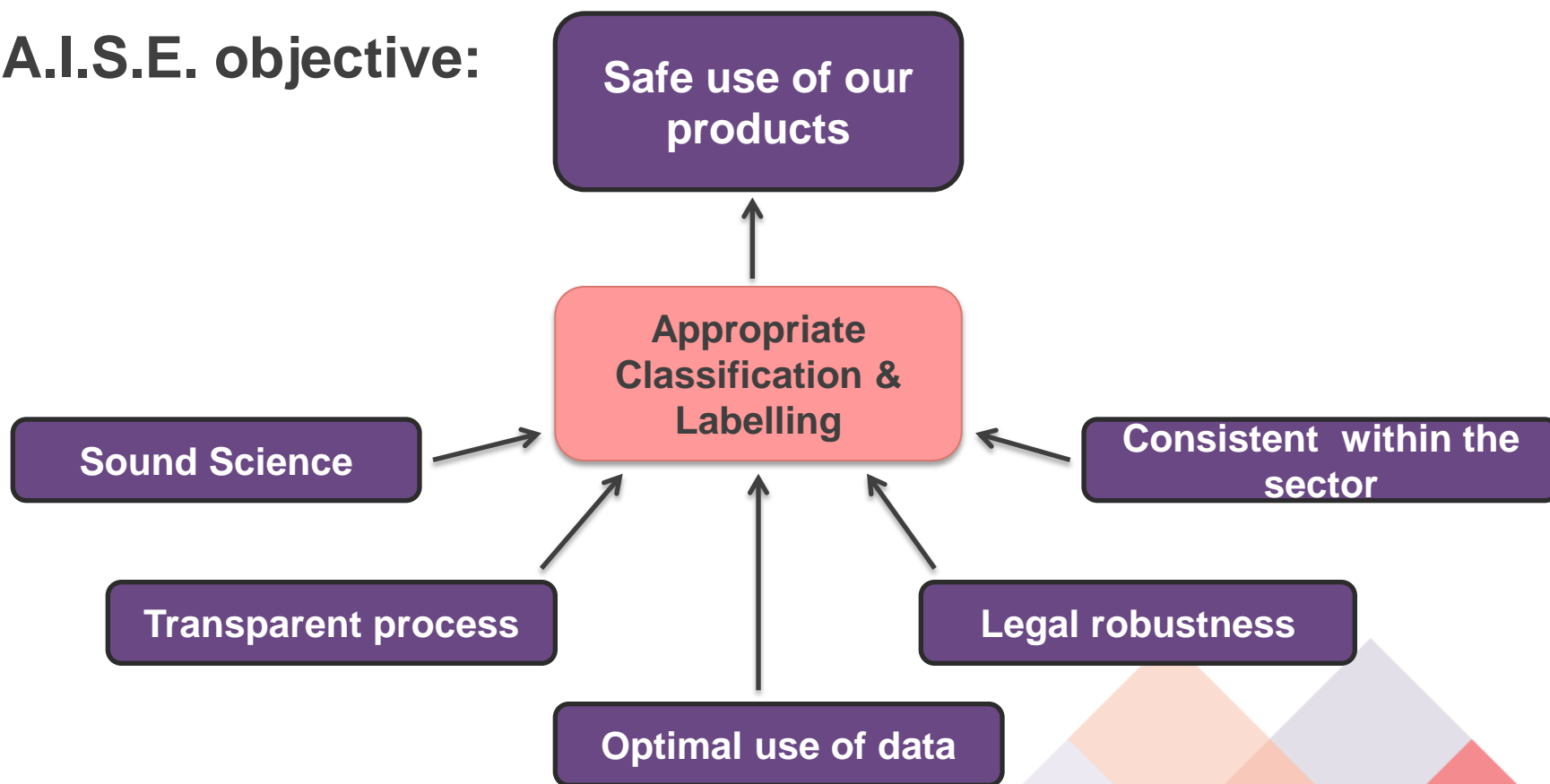
For mixtures:  
by 1 June 2015



CLP

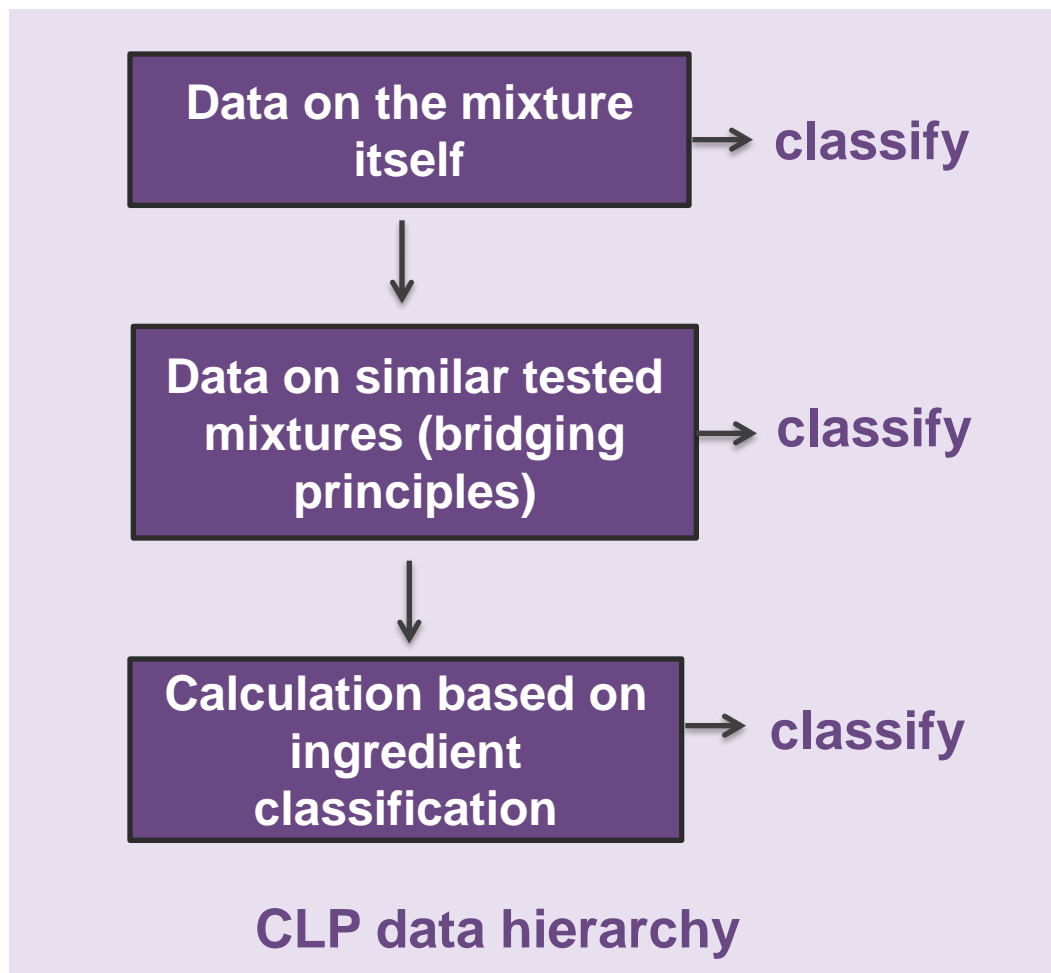
# CLP for future mixture classification

A.I.S.E. objective:



# CLP: new options for classification

**Default:**





<Det>  
<Net>



Using Calculation:

Many more products will become more severely classified and labelled





**It may not reflect actual effects on man**

→ Consumers: **Confusion**: truly hazardous products not distinguished from regular detergents

→ Doctors/physicians: Potential **Overtreatment** in case of accidental exposure (e.g. ingestion)

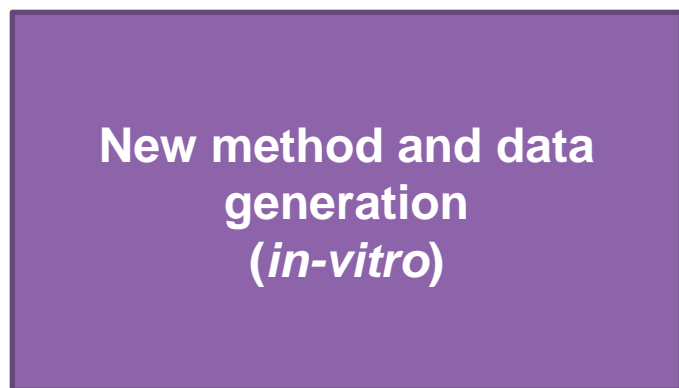
***Appropriate classification and labelling based on test data is essential for safe use by consumers/users***

# 'Default' Option: CALCULATION

		DRAIN CLEANER	HAND DISHWASH DETERGENT
		<ul style="list-style-type: none"><li>■ Caustic</li><li>■ Corrosive</li><li>■ Child Resistant Closure</li><li>■ Special Periodic Use</li></ul>	<ul style="list-style-type: none"><li>■ No Effects in Use</li><li>■ Used Every Day</li><li>■ Left by Sink</li></ul>
LABELLING	TODAY	 Corrosive	 Irritant
	TOMORROW	Default Classification:  Danger Skin Category 1	Default Classification:  Danger Eye Category 1



# A.I.S.E.'s approach for CLP classification



Support generating new data on the mixture itself by assessing *in vitro* methods

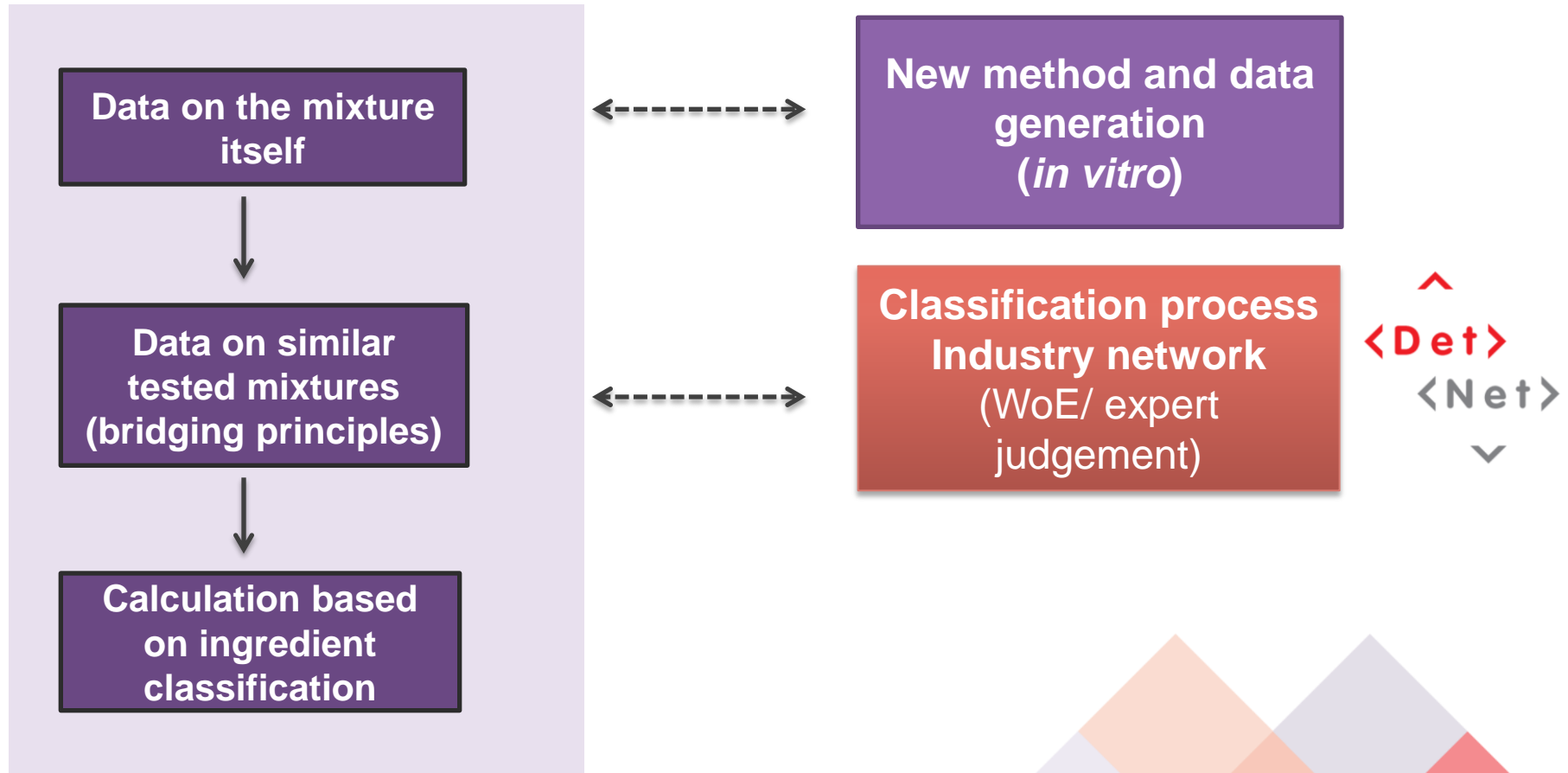


Share existing data & expertise to allow classification of similar mixtures



^  
<Det>  
<Net>  
v

# A.I.S.E.'s approach for CLP classification





# DetNet: NEW initiative, Building on CLP features

CLP Regulation, Annex I (paragraph 1.1.0.):

- *‘Suppliers may cooperate through formation of a network to **share data and expertise***
- *Suppliers should **document fully the basis** on which classification decisions are made*
- *Suppliers should make data and information on which classifications are based **available to authorities on request***
- ***Each supplier remains fully responsible** for the classification, labelling and packaging of products placed on the market’*



# DetNet: Stakeholder engagement

- Sept 2009 Stakeholder workshop
- Webinars in 2011 and 2012
- Face-to-face meetings with selected Member States
- Dialogue with the European Commission, ECHA and Member States
  - ECHA Enforcement Forum
  - CARACAL: Competent Authorities for REACH and CLP



## STAKEHOLDER WORKSHOP - PROCEEDINGS -

Classification and Labelling of mixtures under  
CLP for household detergents and cleaning products



Final draft  
21/11/2010

Association Internationale de la Savonnerie, de la Détergence et des Produits d'Entretien  
International Association for Soaps, Detergents and Maintenance Products

BRIEFING DOCUMENT FOR STAKEHOLDERS:

UPDATE ON DEVELOPMENTS SINCE A.I.S.E. WORKSHOP SEPTEMBER 2009



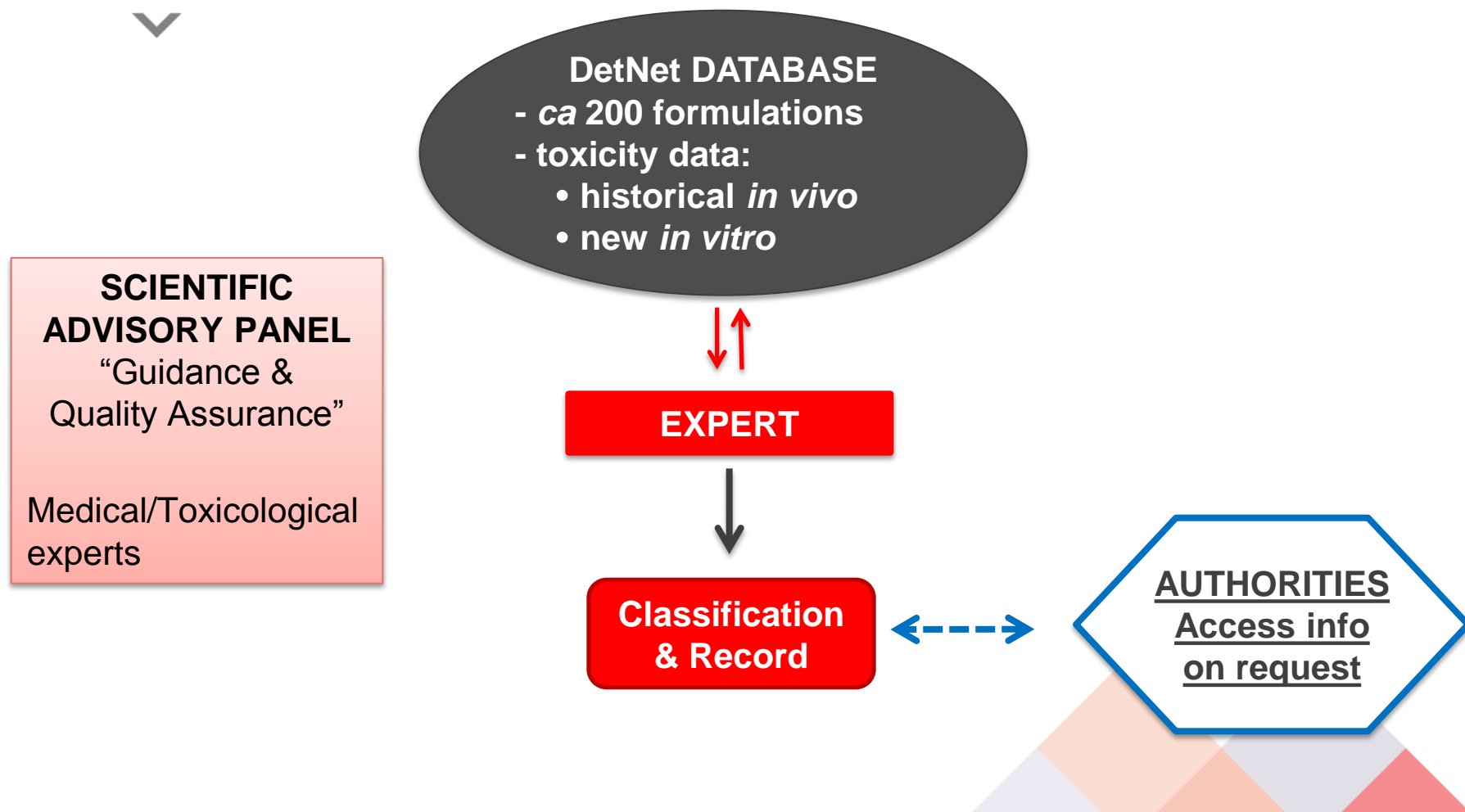
Final  
01/10/2012

Association Internationale de la Savonnerie, de la Détergence et des Produits d'Entretien  
International Association for Soaps, Detergents and Maintenance Products

BRIEFING DOCUMENT FOR STAKEHOLDERS:

UPDATE ON DEVELOPMENTS SINCE A.I.S.E. STAKEHOLDER WEBINARS OCTOBER 2011

# DetNet Overview





# DetNet: Unique features

New and unique industry classification network to share data for mixture classification

Open to all companies (including non AISE members)

Making maximum use of existing data



<Det>  
<Net>

# DetNet: fulfilling CLP requirements



- *Suppliers may cooperate through formation of a network to share data and expertise*

## share data

- Ca. 200 formulations
- Existing in-vivo and new in-vitro data
- Detailed compositions of reference formulations
- Data quality and robustness assessed
- New data to be added going forward

## share expertise

- Sector guidance publicly available
- Scientific Advisory Panel involved in guidance to experts
- Training of classification experts
- Help Desk support
- FAQ



# DetNet: fulfilling CLP requirements

- Suppliers should **document fully the basis** on which classification decisions are made
- Suppliers should make data and information on which classifications are based **available to authorities on request**

## document fully the basis

- Classification Record using a standard format
- Reference formulation(s) used are logged

## available to authorities on request

- Classification logging number as proof
- Through companies access to reference formulation(s) used



# DetNet: fulfilling CLP requirements

- *Each supplier remains fully responsible for the classification, labelling and packaging of products placed on the market*

## Each supplier remains fully responsible

- companies use in-house or contracted expertise needed to classify
- Authorities can ask access to information used to classify



<Det>

<Net>



# CONCLUDING REMARKS

- DetNet is the first Industry Classification Network for mixtures helping companies to appropriately classify their products in a transparent way
- Future development
  - Continue dialogue with authorities
  - Enrich the database with new *in vitro* data
  - Continue to educate consumers and end-users



The DetNet is now open for companies to join



[www.det-net.eu](http://www.det-net.eu)



**Thank you**