

PRODUCT STEWARDSHIP PROGRAMME ON INDOOR AIR EMISSIONS FROM AIR FRESHENERS (April 2016)

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1. THE INITIATIVE

This Product Stewardship Programme (PSP) is an initiative of A.I.S.E. in the domain of indoor emissions from air fresheners. It is a voluntary effort from industry that builds on a series of other initiatives already undertaken by A.I.S.E. in the domain of safety assessment and sustainability. In particular, this PSP (2016) builds on the previous Air Fresheners PSP implemented since November 2007 (PSP 2007).

The aim of this PSP (2016) is to promote best practices throughout industry across Europe, concerning responsible manufacturing, communication and use of Air Fresheners, allowing consumers to make the best informed choices about safe use of products.

2. PSP (2016): SCOPE AND REQUIREMENTS

a. For whom?

Any company that manufactures and/or places on the market Combustible Air Fresheners and Other Air Fresheners in Europe (EU, plus Iceland, Norway, Lichtenstein and Switzerland) can participate, regardless of whether or not it is a member of A.I.S.E. or one of its national associations.

b. Scope

The programme applies to the following products under the remit of A.I.S.E. which emit substances which may become airborne into indoor air as a consequence of their use by the consumer:

- **Combustible Air Fresheners** (mainly perfumed candles and incense)
- **Other Air Fresheners** (sprays, including aerosol – mini and pump-sprays, liquid wick, gel, potpourris, electrical devices, car fresheners).

Companies committing to the Project shall ensure that **all** the products in their portfolio meet the requirements described under the commitment.

3. SAFETY/REGULATORY ASSESSMENT

a. ALL PRODUCTS

In common with all chemical mixtures, in Europe, Combustible Air Fresheners and Other Air Fresheners must comply with the requirements of REACH Regulation (EC) 1907/2006, and the CLP Regulation (EC) 1272/2008¹ and any other applicable legislation, such as the general Product Safety Directive (2001/95/EC) and the Aerosol Dispenser Directive (75/324/EEC). In compliance with REACH, information about substances in the products is systematically gathered for their individual effects and for their identified uses and exposures derived from them. The information on hazard effects is used for CLP classification of substances and mixtures. Both the effects and exposure information are used for assessing the risk posed by the substances and to ensure that such risks are either not significant or adequately controlled by the implementation of appropriate risk management measures.

¹ Taking into account the two years transition period (until 1 June 2017) for products placed on the market before 1 June 2015 and labelled according to the Dangerous Preparations Directive (1999/45/EC)

For substances in products which may become airborne, assessment of consumer exposure needs to be undertaken considering specific emission exposure limits/guideline values. Assessment of consumer exposure may need to be undertaken by means of:

- exposure modelling to determine exposure levels (e.g. BAMA, ConsExpo 1-Box Model, 2-Box Indoor Air Dispersion Model, CONTAM Building Model.)²
- confirmatory environmental chamber testing where exposure modelling indicates a potential issue in regard to agreed emissions limits

All products may contain substances which are not intentionally added when formulating, but which may be “carried-over” during manufacturing and whose presence is unavoidable in the final products and, therefore, may also become airborne. Likewise, further assessment of consumer exposure needs to be undertaken in a similar manner as described above.

b. COMBUSTIBLE AIR FRESHENERS/CANDLES

While the REACH assessment described in paragraph a. above concerns ingredients (substances formulated into products), substances emitted as part of a combustion process require a dedicated assessment, which goes beyond the REACH assessment.

With the aim of addressing this issue, in 2010 A.I.S.E. initiated a project to develop a method to measure emissions from combustible air fresheners. On the basis of this work, three CEN standards have been developed with active involvement of A.I.S.E. and the European candle industry (ECA, AECM).

The CEN standards cover:

1. Development of standardised test methods for the emission of substances coming from the intended use of Combustible Air Fresheners and that may have effects on health.
2. Methodology for the evaluation of test results and calculation of emissions/exposure.
3. Information for the consumers to be supplied by the manufacturers of Combustible Air Fresheners, in addition to those already in use for candles in existing standards.

Thus a risk assessment for specific substances emitted from the combustible air fresheners, such as benzene, formaldehyde and naphthalene, can be derived.

² Inputs for the exposure modelling can be provided in an harmonized way by using tools such as the SCEDs

4. THE COMMITMENT

Beyond fulfilling the mandatory requirements prescribed by the applicable pieces of legislation, companies participating in the A.I.S.E. Product Stewardship Programme 2016 on Indoor Air Emissions from Air Fresheners [PSP(2016)] commit to apply the following, specifically developed, set of voluntary rules and standards to their products in the following areas:

a. Safety

All ingredients and substances used in Combustible Air Fresheners and Other Air Fresheners shall be subject to risk assessment as described in section 3.

The exposure values shall show that the following substances when emitted by a single product unit do not exceed their respective WHO limits³

Formaldehyde – 100 µg/ m³ (30 minutes exposure)*

Benzene - 0.17 µg/m³ (air concentration for excess lifetime risk of leukaemia 1/1000000) **

Naphthalene – 10 µg/m³ (annual average concentration) **

* Short term peak – Referred to as STPC in EN 16739:2015

** Time Weighted Average – Referred to as TWA in EN 16739:2015

Where the company manufactures and/or places on the market a combustible air freshener product, e.g. perfumed candles, it shall, in addition to complying with all relevant legislation, adopt the latest relevant CEN standards. Those available at the time of the PSP (2016) publication are:

- EN 15426:2007 – Candles. Specification for sooting behaviour
- EN 15493:2007 – Candles. Specification for fire safety
- EN 16738:2015 – Emission safety of combustible air fresheners - Test Methods
- EN 16739:2015 – Emission safety of combustible air fresheners - Methodology for the assessment of test results and application of recommended emission limits

b. Sampling

The test method described in the EN 16738:2015 is a design test. It serves a safety purpose for the qualification of products and the manufacturing process.

This test shall be performed on an appropriate, representative type of combustible air fresheners. This test should be repeated, at the minimum, at every substantial design change in product formulation or manufacturing process, if this change may be expected to have an impact on emissions. Test results, as well as any type of rationale developed to justify the need to test a specific product type, must be carefully documented and made available in case asked to prove compliance with the voluntary measures described in the programme.

³WHO guidelines for indoor air quality: selected pollutants, 2010

c. Consumer information

A risk-based communication is imperative to adequately advise consumers on the safe use of products and good handling practices. This is important to strengthen their confidence on the safe and appropriate use of air freshener products at home.

i. Product labels

The Company shall ensure that product labels are designed and labelled according to the following rules:

- Good visibility to be ensured through:

- A good graphic/visual contrast between text and background
- Key safety messages to be clearly indicated (e.g. via use of a text box. See examples in Annex).

- Health related information in label statements:

- Where relevant and applicable, clear advice for safe usage of the product including maximum exposure;
- Where applicable and following national requirements, inhalation abuse warnings for sprays using solvents and propellants;
- In addition to mandatory labelling, the following sentences shall be added to the labels⁴:
 - o “People suffering from perfume sensitivity should be cautious when using this product”⁵
 - o “Air Fresheners do not replace good hygiene practices” or “Ventilate the room after use”.

For **Combustible Air Fresheners**, the safe use icons and/or phrases encompassed in the latest relevant CEN standard. Those available at the time of the PSP (2016) publication are:

- EN 15494:2007 – Product Safety Label
- EN 16740:2015 - Emission safety of combustible air fresheners - User safety information

ii. Information on chemical composition

For **all products** covered by the scope of the PSP (2016), the company shall make all information on chemical composition of the mixture available to the Poison Centres in accordance with Article 45 of CLP Regulation (EC) 1272/2008⁶ or according to Annex VII C of Regulation (EC) No 648/2004, as appropriate.

In addition, the company shall make the mixture chemical composition available to the public at large, on a website. Ingredients shall be listed in accordance with the provisions of Annex VII D of Regulation (EC) No 648/2004. Sensitising substances that are subject to labelling requirements by Regulation (EC) No 1272/2008 (as amended by Regulation (EC) No 286/2011) and/or Regulation (EC) No 648/2004

⁴ A.I.S.E will provide proper translation in all EU official languages for consistent use.

⁵ More specific information related to effects of products on perfume sensitivity and onto precautions to take regarding use can be provided on corporate website.

⁶ A draft legislative proposal on harmonized reporting to poison centers is under preparation by the EC. It will take the form of an Annex to the CLP Regulation. Reporting product composition to poison centers according to this new legislation is expected to become mandatory in 2019. The PSP (2016) will apply the CLP requirements “by anticipation”.

shall also be listed on the website accordingly, if they are present in the product formulation.

The website address shall appear on the product label.

iii. Product shape

Notwithstanding any applicable legal requirements, the *Company* shall not manufacture and/or place on the market: toy-shaped or food-shaped *Products* specifically intended to attract children.

1) toy-shape *Products* in the meaning of “Directive 2009/48/EC on the Safety of Toys”, “a product designed or intended, whether or not exclusively, for use in play by children under 14 years of age.”

Or

2) food-shape *Products* in the meaning of “Directive 87/357/EEC of 25 June 1987 on the approximation of the laws of the Member States concerning products which, appearing to be other than they are, endanger the health or safety of consumers“, namely *Products* which „possess a form, odour, colour, appearance, packaging, labelling, volume or size, such that it is likely that consumers, especially children, will confuse them with foodstuffs“.

iv. Advertising

The company shall not show young children activating the product.

The company shall not promote the product by advertisements involving pregnant women or babies.

The company shall demonstrate appropriate use and product handling in compliance with product labelling when advertising.

All product claims shall be **responsible, substantiated and not misleading**.

The Company shall refrain from using the absence of banned materials in a product as a marketing claim (e.g. "without CFC").

v. Companies' communication on commitment

Should a company wish to communicate on its participation to the initiative, any corporate communication shall use the exact following wording: “Company [name the Company] has committed to the A.I.S.E. Product Stewardship Programme on Indoor Air Emissions from Air Fresheners”. Any use in electronic corporate communication materials must include a link to the Programme Stewardship website www.aise.eu/xxxxxx.

No reference shall be made to the product brand performance.

5. TIMING

The Product Stewardship Programme on Indoor Air Emissions from Air Fresheners (2016) is open for signature starting from 1 April 2016.

The commitment refers to products that are manufactured and/or placed on the market as follows:

- after 1 October 2017 the requirements in “THE COMMITMENT” section under ‘Safety’, ‘Product labels’, ‘Information on chemical composition’, ‘Advertising’ and ‘Companies’ communication on commitment’ apply to all products;
- after 1 October 2017 the requirements in “THE COMMITMENT” section under ‘Sampling’ (i.e. the tests on emissions) apply to the newly developed combustible air freshener products not already in the portfolio;
- after 1 October 2020 the requirements in “THE COMMITMENT” section under ‘Sampling’ (i.e. the tests on emissions) apply to all combustible air freshener products.

If the company is committed to apply the PSP (2007), in such case, the requirements of the first PSP apply until 30 September 2017.

The current Air Fresheners Product Stewardship Programme (2007) will be obsoleted by the compliance deadline (1/10/2017) so that current requirements continue to apply during the transition period (until 30 September 2017).

I. Annex: Financing

A.I.S.E. will establish a separate dedicated budget to support all expenses related to this project.

The mechanism of the financing is the following:

Each company joining the initiative is expected to contribute financially to this project on a yearly basis. The financial contribution will be calculated on the basis of the company EU Value Market Share (VMS) for the previous year for the products covered in the scope of this PSP. However, no company shall pay less than the flat minimum administrative fee of 1.000 € per year.

All estimated VMS are collected on a confidential basis by the A.I.S.E. Secretariat and are based on historical data provided by independent third parties (e.g., ACNielsen, GfK, Euromonitor).

This principle will apply as described from 2017 onwards.

For the year 2016, which is the year of preparation and launch of the project, the founding A.I.S.E. companies who contributed to its development will pay an equal share each of the costs estimated for 2016 to put the project in place. Every other member that joins the initiative in the course of the year 2016 is asked to contribute of a fixed amount of 1.500 € invoiced at the time of commitment.

At the end of each year, a reconciliation of the actual costs of the PSP and the yearly fees paid by the supporting companies will be done. This will take into account the actual costs of the project and the total number of signatories for that year.

The proposed mechanism aims at covering the actual costs of the project, not at making any profit. In case the mechanism proposed will generate extra-income at the end of a calendar year, this won't be retained by A.I.S.E. but rather considered for the funding of the following year.

Note: The most recent budget estimations for this project will be made available by A.I.S.E. Secretariat upon request and without the need to commit to the project.