



^
<Det>
<Net>
v

DetNet

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

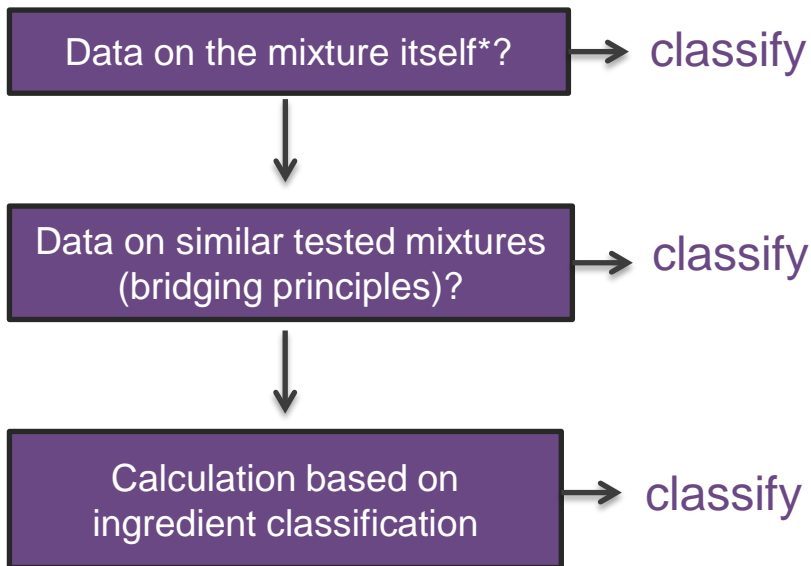
Enforcement Forum 29 October 2013

An A.I.S.E. Initiative

CLP: data hierarchy

^
<Det>
<Net>
v

CLP

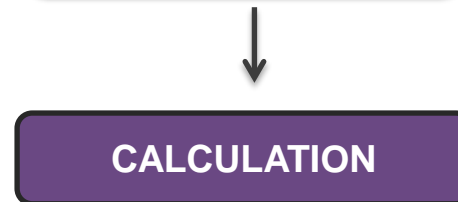
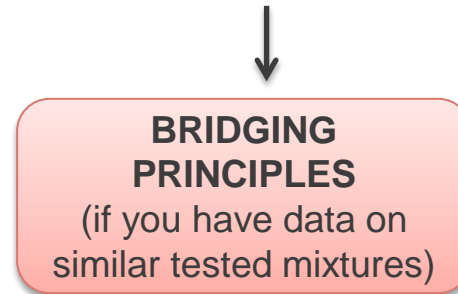


*No human testing for classification purposes, no new animal testing.
Data generation: *in vitro* methods

In practice,
mixture to classify?



Expensive
Takes some time
Suitable *in vitro*
method selection



Easiest
Conservative
More severe C&L
likely

<Det>

<Net>



Many more products will become more severely classified and labelled ($\geq 3\%$ Eye Cat 1 surfactant)

For consumers/users:

- Not reflect actual effects on man
- Confusion: truly hazardous products not distinguished from regular detergents
- Devalue warning labels
- Lead to unsafe handling
- Overtreatment by PCCs in case of accidental exposure (e.g. ingestion)

Appropriate classification and labelling is essential for safe use by consumers/users: no confusion between products

'Default' Option: CALCULATION

DRAIN CLEANER

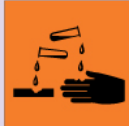



- Caustic
- Corrosive
- Child Resistant Closure
- Special Periodic Use



HAND DISHWASH DETERGENT

- No Effects in Use
- Used Every Day
- Left by Sink



| | | | |
|-----------|----------|--|---|
| LABELLING | TODAY |  Corrosive |  Irritant |
| | TOMORROW | Default Classification:  Danger Skin Category 1 | Default Classification:  Danger Eye Category 1 |

A.I.S.E.'s project for CLP implementation

Adequate safety assessment for skin and eye effects,
based on *in vitro* test data

Toxicological /classification
and safety data

New method and data
generation
(in vitro)

Share expertise to use and
interpret data

Classification process
Industry network (WoE/
expert judgement)

Stakeholder dialogue

Legal basis: CLP Regulation, Annex I (paragraph 1.1.0.): “Suppliers may cooperate through formation of a network to **share data and expertise [...]**”

DetNet

Unique features

Web-based IT system

- IT-system searches the database of Reference Formulations
- Security (individual access code), confidentiality protected

Data sharing for all users, expertise

- 180 formulations, including recent market representative products
- Enhanced composition details on reference formulations
- Recent *in vitro* data using enhanced test method for eye effects
- Data quality and robustness assessed (Klimisch scoring)
- Study Summaries available
- Scientific Advisory Panel comprising experts from academia

Standardised process and records

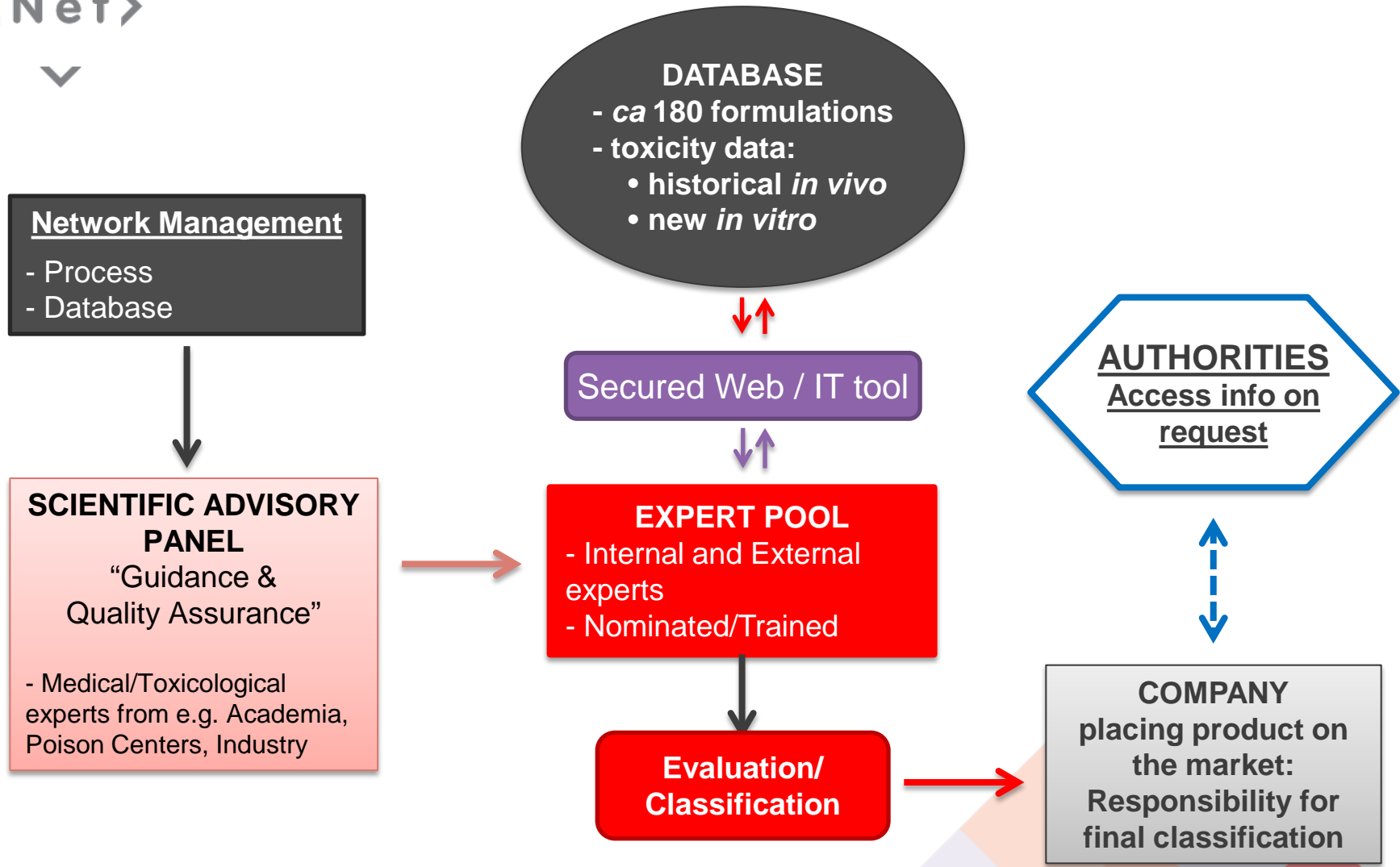
- Classification Record using a standard format
- Classification logging number as proof
- Classification guidance

Training and support

- Training of classification experts
- Help Desk support in the future
- FAQ

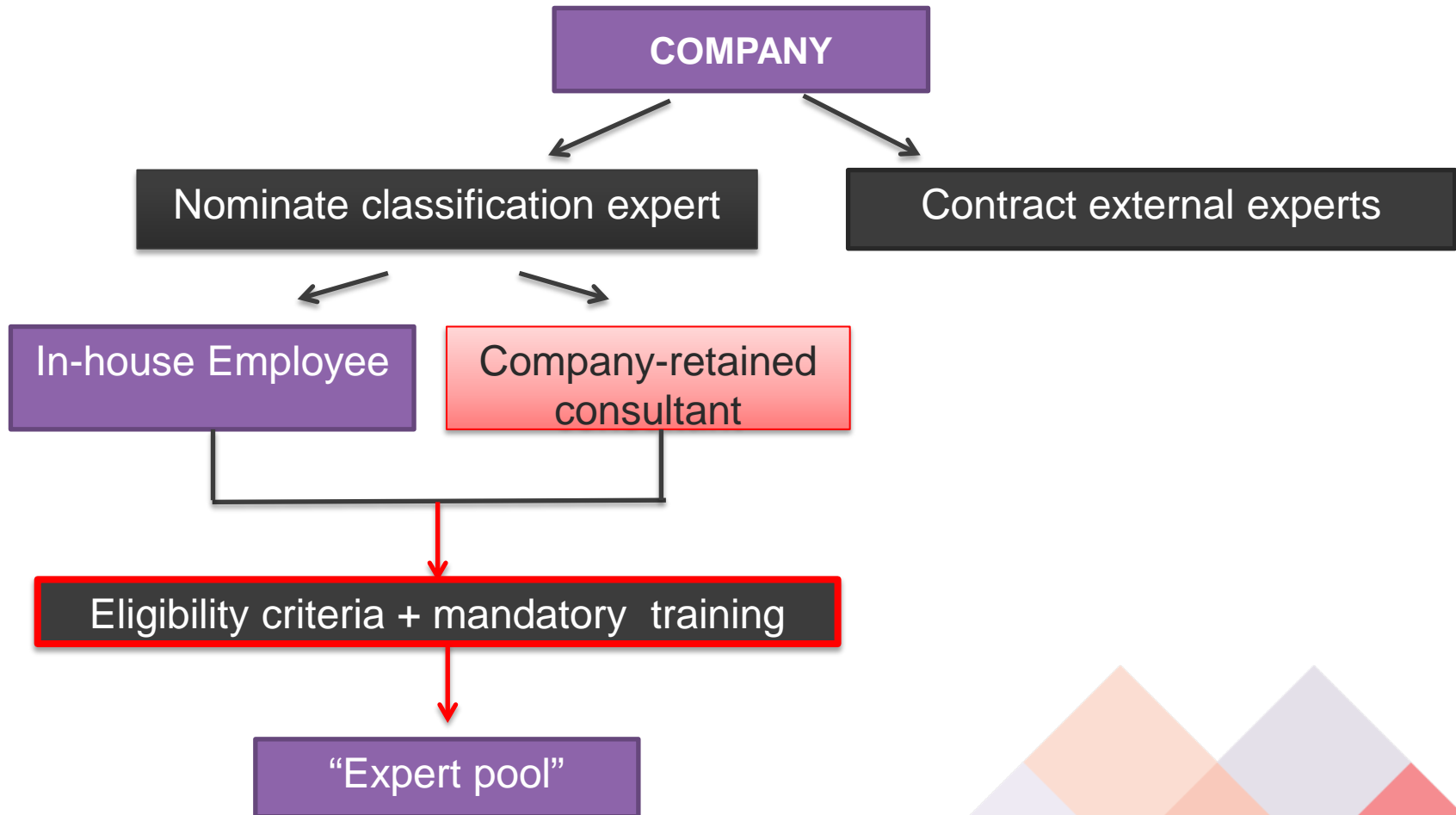
DetNet: Organisational structure

^
<Det>
<Net>
v



Experts

Options for company



Classification Record (p.1)

<Det>

<Net>

CLP Annex I
1,1,0: Suppliers
should document
fully the
classification
basis; data and
information to be
made available to
authorities on
request

| Detergent Industry Network for CLP Classification | |
|---|---|
| CLASSIFICATION RECORD | |
| Skin/Eye Hazard Classification of Laundry/Home Care Products | |
| General Information | |
| Company | Any Company Ltd |
| Formulation Name | Mixture M1 |
| Product Category | Laundry Detergent Liquid |
| Formulation Number | 123456 |
| Physical / Chemical Properties | |
| Physical Form | Viscous liquid |
| pH (neat liquid or 10% solution powders) | 8 - 9 |
| Acid/Alkaline Reserve (Young et al method; expressed as grams NaOH [equivalent] per 100g test material) | Not applicable |
| Other relevant information | |
| Classification | |
| Classification according to CLP criteria (skin/eye hazards) | Skin Corrosion/Irritation Category 2 Serious Eye Damage/Eye Irritation Category 2 |
| Method used to derive Classification | 'Permitted variations' bridging principle (CLP Art. 15 / Annex I, 1.1.3.6) and expert judgement |
| Supporting Data / Justification | Classification of Mixture M1 via application of substance criteria is not possible since skin corrosion/irritation or serious eye damage/eye irritation data are not available; Classification via the application of bridging principles can be considered since there are sufficient data on both the individual ingredients and a similar tested mixture (Mixture F); The 'permitted variations' bridging principle can be applied because: (i) Mixture F is classified as hazardous; (ii) Mixtures F and M1 contain the same ingredients; (iii) The concentrations of the hazardous ingredients in Mixture M1 are within permitted variations; (iv) Based on expert judgement, the changes in composition are considered not to result in a change of classification thus Mixture M1 can be assigned the same skin/eye classification as Mixture F. See formulation comparison chart on page 2 |
| Approval | |
| Classification derived by | G. Raff |
| Classification completed | 23 Jan 2012 |
| Classification logged on DetNet website | 26 Jan 2012 |
| Classification logging number (assigned by DetNet website) | ICN/000001 |

Classification Record (p.2)

<Det>

<Net>



Formulation Comparison Chart:

| Ingredient | Skin/Eye Classification | Mixture F tested | Tolerance band for changes | Mixture M1 untested |
|------------------------|-------------------------|------------------|----------------------------|---------------------|
| Non-ionic surfactant P | Eye Cat 1 | 6.0 % | 4.8 – 7.2 | 7.0 % |
| Anionic surfactant K | Skin Cat 2 Eye Cat 1 | 14.0 % | 12.6 – 15.4 | 15.0% |
| Citrate | Not classified | 5.0 % | not applicable | 5.5 % |
| Ethanol | Eye Cat 2 | 4.0 % | 3.2 – 4.8 | 3.5 % |
| Polycarboxylate | Not classified | 0.75 % | not applicable | 0.8 % |
| Water | | to 100 | | to 100 |

CLASSIFIED
Skin Cat 2
Eye Cat 2

Summary of classification data for Mixture F:

Skin

Insert reference to study summary

Eye

Insert reference to study summary

Expected with DetNet





CONCLUSIONS

- **Reclassification of detergents under CLP: DetNet is the first Industry Classification Network for mixtures**
 - Building on CLP: hierarchy of data, bridging principles, expert judgement, classification network, etc.
 - Use of *in vitro* methods to generate new skin and eye data
 - Data-sharing at A.I.S.E. level for a sector-harmonised approach
- **A.I.S.E. has more work ahead: more data into the database, more dialogue with authorities, work on science: PCC data and *in vitro***
- **We welcome your feedback**