

CESIO

news



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EUROPEAN COMMITTEE OF ORGANIC SURFACTANTS AND THEIR INTERMEDIATES

JUNE 2004

Oleochemicals and Surfactants Platform

In order to benefit from synergies and to reinforce the overall effectiveness of the organisations, an "Oleochemicals & Surfactants Platform" has been created within Cefic.

This platform will include the activities of APAG*, CESIO** and ECOSOL*** and will be part of Cefic Product Stewardship Programme.

Chantal De Cooman has been appointed Director of the newly created platform Oleochemicals & Surfactants as from 1 May 2004, and will report directly to the Executive Director of the Product Stewardship Programme, Thomas Jostmann.

For the APAG-related activities, Ken McDonald will continue to work as Senior Counsellor and Jean-Charles Pascoli, joined Cefic on 1st June as Counsellor. His responsibilities will include the management of APAG six product groups in non technical areas (fatty acids, glycerine, alcohols, metallic soaps, fatty nitriles & derivatives, fatty esters).

At the time of writing this newsletter, a Technical Senior Counsellor is still being actively sought for CESIO-ECOSOL.

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Detergent Regulation

On 8 April 2004, the new Detergent Regulation was published in the Official Journal and will enter into force 15 months later, i.e. on 8 October 2005. Through the first and second reading, the EU Parliament as well as the Council of Member States introduced a lot of modifications and amendments compared to the original proposal of the Commission. In this review, only some major features relevant for surfactant producers are briefly summarized. In case of uncertainty, the text of the English version of the Regulation should be examined.

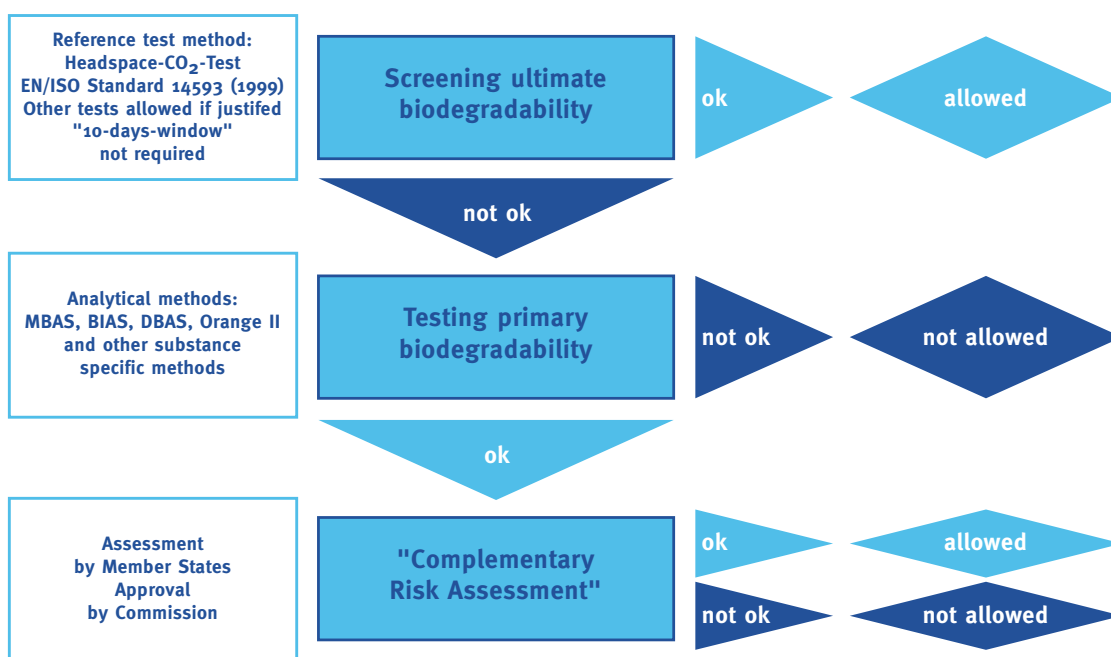
In contrast to the existing situation, the new legislation is a EU-Regulation that will become effective in all Member States without any national modification. The main part deals with the requirements on biodegradability of surfactants, but there are additional requirements relating to ingredient labelling of detergents and the need for manufacturers to have full ingredient datasheets available for use by medical personnel if required.

Of particular importance are the definitions of "detergent" and "surfactant". The Regulation considers as "detergents" any substance or preparation intended for cleaning of

laundry, fabrics, dishes and other hard surfaces when marketed for household, industrial or institutional purposes. Auxiliary washing preparations intended for soaking (pre-washing), rinsing and bleaching as well as laundry fabric softeners are also included. "Surfactant" is defined in terms of general structural and physical chemical properties, but no exact criteria are specified. CESIO will develop guidance on how to use this definition in order to help decision-making in grey-zone areas.

In future, surfactants used in detergents should be ultimately biodegradable under aerobic conditions. The test methods to be applied are indicated in Annex III of the Regulation. Five methods using CO₂ production or O₂ consumption for measurement are generally applicable. Two other methods based on DOC removal may be used if justified, i.e. if it can be shown that true biodegradation was measured and not adsorption. In any case, compliance with the so called "10-days-window" is not required. The tests should have been conducted according to EN ISO/IEC 17025 or GLP (good laboratory practice) unless the surfactants were placed on the market before entry into force of these standards and the tests are considered to be of comparable quality.

Biodegradability testing scheme



In order to be able to prove that a surfactant used in a detergent is in compliance with the requirements of the Regulation the detergent manufacturer should have available suitable information about the ultimate biodegradability of the surfactant. In case the detergent manufacturer requires this information from his supplier an appropriate statement in the MSDS (material safety data sheet) should be sufficient. CESIO is currently developing a proposal to address this need. It must be emphasised that this statement should be based on an existing test report. In addition, any manufacturer of detergents or surfactants should be able to show that he is allowed to benefit from the property rights relating to any test results.

If a surfactant is not ultimately biodegradable the manufacturer of the detergent and/or surfactant may ask for derogation. A prerequisite for this is that the surfactant is at least primarily biodegradable passing the tests stipulated in Annex II. Additional data as outlined in Annex IV of the Regulation has to be submitted. The EU Commission may consider granting derogation if the surfactant is used in low dispersive industrial or institutional applications and the risk is small compared to socio-economic benefits.

Concerns were raised by members of the EU-Parliament that non-surfactant organic detergent ingredients should be biodegradable like surfactants and that surfactants should also biodegrade under anaerobic conditions. Both issues will be evaluated by the EU Commission within 5 years when reports and, if appropriate, legislative proposals have to be presented.

The text of the Detergent Regulation as well as further documents prepared in the context of this legislation are found at:

<http://europa.eu.int/comm/enterprise/chemicals/legislation/detergents/index.htm>

Ecolabelling

In 2003, the European Union Eco-labelling Board (EUEB) has been mandated by the EU Commission to update the EU ecolabel criteria for detergents as follows:

- the general criteria on hand dishwashing detergents, all purpose cleaners and sanitary cleaners and
- the DID list (detergent ingredients database)

The updated DID list will be applicable to the revised ecolabels as mentioned above after its publication.

A decision has then been taken by the EUEB to create a DID list that will be applicable for the Nordic Swan ecolabel ingredients at the same time. Final votes are expected around September. The finalisation of this work is scheduled for the end of 2004.

CESIO participation of the EUEB meetings started in 2002. Concerning the update of the DID list, CESIO was in principle in favour to contribute to this exercise, but some guaranties of confidentiality and data protection including the guaranty that the CESIO data will not be used for other purposes were requested before submission of data could be recommended to CESIO Member Companies. This point was addressed in a meeting with Mrs Eskeland, representative of Ecolabel Norway, in June 2003.

In March 2004, CESIO got the requested confirmation and CESIO Member Companies were immediately asked to provide data. The data compilation has been carried out in a couple of weeks and the consolidated data were sent to Mrs Eskeland mid of April 2004.

In July 2003, the Fraunhofer Institute Umsicht published a report on the anaerobic biodegradability of surfactants prepared at the request of DG Enterprise. The conclusion of this report is that the anaerobic biodegradability is not needed as long as ultimate and ready biodegradability under aerobic conditions is achieved.

Based on this report, CESIO and ECOSOL prepared a position paper addressing the inappropriateness of detergent ecolabel criteria in terms of anaerobic biodegradability. This paper has been distributed before the last EUEB meeting on 12 May 2004.

HERA - Human and Environmental Risk Assessment on ingredients of household cleaning products

The HERA project, established in 1999, is a partnership between AISE (The International Soap, Detergent and Maintenance Products Association) and Cefic (The European Chemical Industry Council). The aim of the project is to produce safety evaluations of chemicals used in household cleaning products addressing both hazardous properties and exposure in a transparent manner and communicate the outcome.

The household cleaning products sector was selected for the project as it is a sector where very high tonnage of chemicals are used, where the exposure is high, and where about 650 of the HPV substances are used. From the Cefic side, a number of sector groups are participating CESIO and ECOSOL representing the surfactant producers.

Phase 1

The first phase of the project, started in 1999, aimed at developing the methodology for the HERA risk assessments and applying them on a number of example substances. With the publication of the AES environmental risk assessment on the HERA website mid June 2004 the first phase takes another step towards completion covering 16 substances and 114 CAS numbers. Surfactants covered are AES, AS, LAS and fatty acids. Phase 1 has taken longer than expected to finalise and is now expected to be completed mid-2004. One of the key learnings is that high level of continuous commitment and support for the project is needed in a situation when limited resources are more and more a bottleneck. However HERA has provided good and much needed training to Substance Teams and leaders and we now have all exposure scenario data for faster RA's in the future.

Phase 2

The second phase applying the HERA risk assessment methodology on a number of additional substances with different functionality covers 14 substances and 125 CAS numbers. Surfactants covered are amidopropyl betaines, esterquats and amine oxides. Here nine risk assessments out of 28 (human health and environment) for the 14 substances have been drafted and are under internal review. While Phase 2 is expected to go faster and most of the substances be finalized by the end of 2004 it is also

recognized that gathering of data is still the most time consuming part of the process.

Phase 3

Another 7 substances is proposed for a third phase to be dealt with during 2005. However the list of proposed substances does not include any surfactants.

Link to other programs

A policy for how to link HERA activities to other programs such as ICCA/HPV and EU risk assessments has been developed. In principle HERA will use the data developed in the other programs and in the case an EU risk assessment exists, just write a short summary and in cases a hazard data set exists from e.g. an OECD SIAR use this data and add the relevant European exposure scenario for the risk assessment.

Communication

Communication and consultation with stakeholders is an essential part of HERA activities. Consultations so far have included topics such as the scientific approach taken, political relevance and more lately an attempt to communicate the outcome of a risk assessment in a more consumer friendly format.

The third Stakeholders Workshop in November last year, "Talking about chemicals with consumers; The language of Risk Communication", addressed risk communication. A booklet on the proceedings from this workshop is available and can be ordered from the HERA secretariat.

Beyond 2004

Originally the HERA project was intended to be finalized by end of 2004. However being a pioneer in setting up a broad cooperation between producers and downstream users in addressing the safe use of chemicals the question on how to best build on these experiences in future cooperation between producers and downstream users to address issues of mutual interest have been raised.

CESIO and REACH (Registration, Evaluation and Authorisation of Chemicals [Previously "The White Paper"])

In terms of the REACH legislation, even the special 7th issue of CESIO news from September 2003 seems a long time ago.

[http://www.cefic.be/files/Publications/cesio_7.pdf]

The issue is enormous, and significant changes had occurred already in the text of the official Proposal for a Regulation of 29 October 2003 by comparison with earlier versions [1].

Perhaps the most significant change in the proposals for the surfactants industry is the exclusion of polymers from the first stage of the registration process. The possibility of having to register thousands of additional polymers or even individual components of polymers had raised great concern with respect to workability of the regulation.

The REACH legislation of course affects the whole of the European chemical industry, is not finalised, and is likely to be subjected to more delays and significant further amendment before becoming law.

Under such conditions a relevant question is "What can CESIO specifically do that is not already being done by the rest of the chemical industry and its customers in general?"

The general advice from CEFIC of 14 January 2004 on what companies should and should not be doing at this stage in the REACH legislation process can be summarised as:

- 1) Collect information on your product portfolio including an inventory of all substances subject to the current REACH proposal, including CAS numbers, supplier/competitor information / uses / available toxicological data.
- 2) Discuss as appropriate with your Sector group / Association the scope for forming consortia
- 3) **Don't** forget competitive advantage. Retain ownership of your data, make contractual arrangements with consortium members, **do not** produce Registration

Dossiers on the basis of the current text, except for the purposes of pilot trials and similar exercises.

This is in line with the remits of the CESIO REACH task force as outlined in CESIO news issue 6: [http://www.cefic.be/files/Publications/cesio_6.pdf]

- To identify preparatory actions that could be taken by CESIO and its membership to facilitate implementation of REACH
- To identify potential issues arising from the implementation
- To facilitate gathering and collection of fundamental data essential to the REACH process by
- Liaising with sister organisations and sharing thinking to ensure consistency and prevent duplication

By combination of these sources it can be concluded that best roles for CESIO at this stage are:

- (a) To continue to monitor the changing legislation as it impacts the surfactants business in particular and make appropriate information to feed-back from the membership
- (b) To facilitate the identification of substances and groups of substances on the market and potential participants in consortia formation.

However even attempts to carry out (b) are themselves made difficult by the changing nature of the legislation and the different approaches being taken by different member companies to the legislation. For some companies with large volume - well documented - substances consortia are not so critical as for smaller volume SMEs and companies with relatively high numbers of products of low volume. In the extreme, companies are awaiting the final text before deciding which products they will retain an interest in supporting through the REACH process. Companies will not join consortia for products they will no longer manufacture or import!

Bearing all this in mind, the CESIO REACH Task Force will restrict its activities over the next few months to amending a previously drafted spreadsheet of CAS numbers of non-polymer-surfactants and inviting any companies who are ready to do so to express an interest in particular substances or groups of substances.

Companies will be able to add to the lists if they wish to extend the list of candidate surfactant substances for eventual consortia formation.

This exercise should help smaller companies in particular to identify substances and groups of substances for which they may either find other consortium members or even discover that they are sole suppliers.

Further activities can only be defined and carried out as the text of the legislation and the time-scale for its implementation are developed further.

[1] Latest text of proposals referred to in preparing this document at time of writing was "COM(2003) 644 final of 29/10/2003: Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), establishing a European Chemicals Agency and amending Directive 1999/45/EC and Regulation (EC) (on Persistent Organic Pollutants)
EUR-Lex - Legislation in preparation - COM 2003 0644 (03)

CESIO Statistics for Western Europe

The data below cover the period 2001 and 2002 and reflect volume expressed as 100% active substances

ooo MT	Production			Sales and Captive Use		
	2001	2002	Index	2001	2002	Index
1. Anionics						
LAS	454	408	90	356	249	70
Alkane sulphonates	81	100	123	76	88	116
Alcohol sulphates	89	86	97	70	68	97
Alcohol ethersulphates	311	331	106	304	274	90
Other anionics	75	76	101	56	64	114
Total anionics	1 010	1 001	99	862	743	86
2. Nonionics						
Alkylphenol ethoxylates	96	83	86	71	59	83
Alcohol ethoxylates	776	803	103	694	695	100
Other ethoxylates	182	185	102	144	152	106
Amine oxides	11	10	91	9	9	100
Other nonionics	218	198	91	182	186	102
Total nonionics	1 283	1 279	100	1 100	1 101	100
3. Cationics						
Esterquats and imidazolinium salts	158	186	118	127	186	146
Other cationics	58	48	83	41	53	129
Total cationics	216	234	108	168	239	142
4. Amphoteric						
Betaines	29	59	203	26	57	219
Imidazolines	6	11	183	5	10	200
Other amphoteric	6	6	100	6	6	100
Total amphoteric	41	76	185	37	73	197
Total	2 550	2 590	102	2 167	2 156	99

Forthcoming 7th Surfactant World Congress:

Yes, although CESIO 6th Surfactant World Congress in Berlin is hardly over, we already need to start thinking about the next congress.

ASPA - the French surfactants association*

on behalf of CESIO, will take care of the arrangements for the forthcoming 7th CESIO Surfactant World Congress.

This Congress will take place in

PARIS, FRANCE,

« Palais des Congrès »

On 22nd through to 26th June 2008

* (Syndicat National des Fabricants d'Agents de Surface et de Produits Auxiliaires Industriels)



Future Events

6th World Surfactants Congress, 20-23 June 2004, Berlin, Germany

CESIO 2004 will stimulate communications between manufacturers and suppliers in order to improve everyone's awareness of where the surfactant industry is going, and what needs to be accomplished in the future. This congress is a great opportunity to learn the latest developments in various areas of the surfactants industry, to discuss key issues with colleagues and to discover opportunities for the future.

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CED Annual Meeting (Comité Español de la Detergencia Tensioactivos y Afines), 6 - 8 April 2005, Barcelona, España

Plenary Lectures, Lectures and Posters will be presented on specific scientific-technical topics:

- Raw materials
- Synthesis and Analysis
- New Developments and Applications
- Physico-Chemistry
- Environment
- Legislation
- Markets
- Consumption / Distribution

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2nd World Oleochemicals Conference, 10 - 13 April 2005, Athens, Greece

Building on the success of the 2002 World Oleochemicals Conference in Barcelona, this global conference will bring together suppliers, producers and end users of oleochemicals to discuss the latest developments in the industry. With the special focus, Meeting the Demands of the Future, the technical programme will concentrate on how the oleochemical industry needs to respond to trends and developments to ensure success.

Cosponsored by:

- ASEAN Oleochemical Manufacturers' Group (AOMG)
- Fatty Oil Products Committee of the Japan Soap and Detergent Association (JSDA)
- Industrial Oil Products Division of the American Oil Chemists' Society (AOCS)
- Oleochemical Committee of the Soap and Detergent Association (SDA)
- The European Oleochemicals and Allied Products Group (APAG)

For further information, please contact:
2005 World Oleochemical Conference
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96th AOCS Annual Meeting & Expo, 1-4 May 2005, Salt Lake City, Utah, USA

The AOCS Annual Meeting & Expo is the most prominent event for the world's leading professionals in vegetable oils, fats, soaps, surfactants, detergents, and related fields. Year-to-year, delegates are given the opportunity to attend technical sessions in 14 interest areas! This comprehensive program allows delegates to pick and choose from topics that directly impact their work or research, giving them various take-home strategies and ideas to implement upon the conclusion of the meeting.

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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 Intermédiaire 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.

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