

Skin sensitization for treated articles – Detergent industry's perspective

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CLP on Hazards for Sensitisers

2 Levels of **Hazard** for chemical mixtures:

- H317 is a classification limit defined to protect consumers from the risk of potential induction of (skin) allergies by the mixture as sold
- EUH208 for levels up to 10x lower than the H317 level as a warning limit to protect already sensitised consumers from potential elicitation of allergic reactions by the mixture as sold



CLP on Hazards for Sensitisers

2 Levels of **Hazard communication** for chemical mixtures:

• H317:

'May cause an allergic skin reaction' AND '(substance name)'



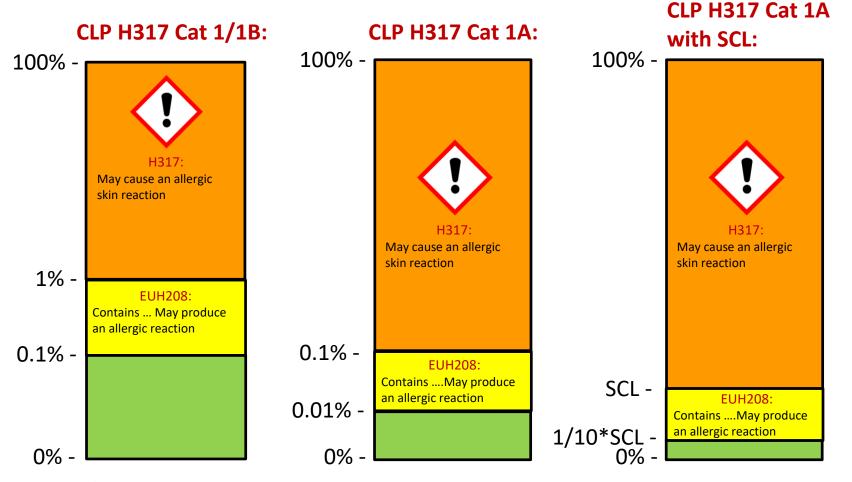
• EUH208:

'Contains (substance name). May produce an allergic reaction'



CLP on Hazards for Sensitisers

As function of allergen level (ca. logarithmic scale)





3 EU regulations guide the labelling of (sensitising) preservatives:

- **CLP**: for Induction(H317) or Elicitation (EUH208)
- Detergent Regulation: presence of preservative regardless of level
- BPR: the preservative used in the 'treated article'







(UK) Ingredients: 5-15% Anionic surfactants, Nonionic surfactants; <5% Phosphonates, Geraniol, Linalool. • (FR) Ingrédients: 5-15% Agents de surface anioniques, Agents de surface non-ioniques; <5%Phosphonates, Enzymes, Azurants optiques, Benzisothiazolinone, Parfum, Methyl-2-octynoate, Citronellol, Geraniol, Linalool. • (DE) Inhaltstoffe: 5-15% Anionische Tenside, Nichtionische Tenside; <5%Phosphonate, Enzyme, Optische Aufheller, Benzisothiazolinone, Duftstoffe, Methyl 2-Octynoate, Citronellol, Geraniol, Linalool.

www.thisbrandingredients.info











Producer and manufacturing address



(UK) Distributor: Retailer Y UK Ltd. Tower of London, London, UK. E-mail: consumer@retailerY.eu • (FR) 800 1234 5678 (EU) (FR) Distributeur: Distributeur Y France S.A., 24 Bd des Champs-Elysées 75000 Paris, FR. E-mail: consumer@distributeurY.eu • (DE)

800 1234 5678 (EU) (DE) Handler: Einzelhändler Y Germany GmbH, Strasse 123, 12345 Hamburg, DE. E-mail: info@EinzelhaendlerY.eu









surface non-ioniques; <5%Phosphonates, Enzymes, Azurants optiques, Benzisothiazolinone, Parfum, Methyl-2-octynoate, Citronellol, Geraniol, Linalool, • (DE) Inhaltstoffe: 5-15% Anionische Tenside, Nichtionische Tenside; <5%Phosphonate, Enzyme, Optische Aufheller, Benzisothiazolinone, Duftstoffe, Methyl 2-Octynoate, Citronellol, Geraniol, Linalool.

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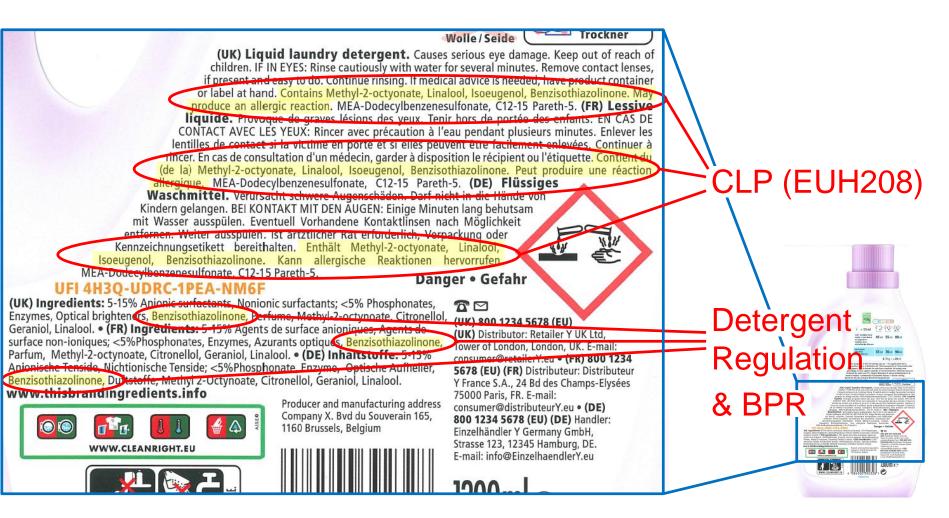


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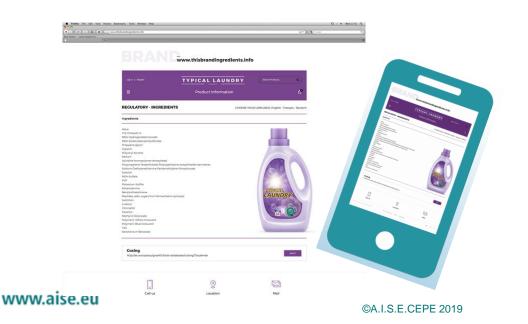








- Online ingredient listing required for Detergents
- On-pack communication on allergens could be improved to avoid duplication by CLP and Det Reg
- Need for more user-friendly online tools especially for already sensitized people?







BPR is based on Risk Assessment

Is there a **Risk** from detergents for allergic reactions?

- D. Basketter* (focus on fragrance allergens): very little evidence in the literature
- Industrieverband K\u00f6rperflege- und Waschmittel**: <3 medically confirmed cases per year (over a 10 year period) for Germany (>80 Million people) collected by industry

Yet, BPR restricts some preservatives based on the CLP **Hazard** levels

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^{*)} D. Basketter e.a., Eur J Dermatol 2015; 25(1): 7-13.

^{**)} IKW annual report 2017 (<u>www.ikw.org/fileadmin/ikw/z-IKW-ENGLISCH/IKW_AnnualReport-2017-2018.pdf</u>) p 26.



BPR is based on Risk Assessment

- BPR should authorise preservatives based on risk assessment
- On-pack listing of allergens protects and informs all end-users on hazards (including those already sensitised), but could be improved



THANK YOU

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