



14 September 2006

Herbert Aichinger
DG Environment
DG Environment
European Commission
B-1049 Brussels

Dear Mr Aichinger,

Ecolabel criteria on soaps and shampoos - proposal for delay in finalisation

I am writing on behalf of BEUC and EEB to ask the Commission and Competent Bodies to agree a 6-month period of delay in the final discussion of the soaps and shampoos draft criteria. This ecolabel will be discussed at the Ecolabel Board meeting next week.

Following the Commission's final position on not allowing 'health-only' criteria to be included in this product group, BEUC sought the advice of a scientific expert in order to develop a more robust, science-based argument for what it considered a political decision by the Commission. We have also had extensive contact with one of Europe's leading ecological washing and cleaning products manufacturers, Ecover. They are willing to contribute their experience and knowledge to the extra research we propose to undertake in the 6-month period.

Our key issues of concern are:

- 1. The draft criteria do not adequately address the issue of micropollutants from personal care products that are not removed from current wastewater and drinking water treatment plants.**
POSEIDON, a European project that ended in mid-2004 studied the existence of residues of pharmaceuticals and personal care products (PPCPs) in the environment, and investigated how to improve water treatment processes so that the PPCPs can be eliminated due to various environmental and health implications. A key result: *" Although, the socio-economic relevance of a PPCP contamination is difficult to quantify since the ecological and toxicological relevance of micropollutants and their mixtures are not yet clearly understood... . Since a wide variety of new PPCPs with specific chemical and biological properties but often unknown (eco)toxicological effects are produced and day by day released in unmatched and increasing quantities, to seek for their impact and for feasible methods of remediation is a mandatory minimal variant of the precautionary principle for preservation of primary life supporting fundamentals".*
- 2. Current eco-toxicological scientific knowledge is too poor to separate environment and health issues.**
The Commission decided that 'health-only' criteria could not be included in the soaps and shampoos ecolabel because these aspects are dealt with under the Cosmetics Directive. Scientific assessment of substances regulated by the Cosmetics Directive is dealt with by the Scientific Committee on Consumer Products (SCCP). Its opinions take into account only health-related criteria, based on a conventional toxicological approach, ie assessment of individual ingredients and not a combination of ingredients. This is too simple an analysis considering that cosmetics are mixtures of numerous ingredients. For example, of the 212 shower gels available on the French market in 2005, the average number of compounds was 20, the total number of different ingredients was 505, 31 of which were preservatives and 36 were dyes.

Further, the SCCP evaluations do not include environmental criteria. The consequence is that a number of non-evaluated compounds can be found in the environment - in water or soil - and in untreated water, without monitoring and with potential risks for aquatic organisms, the food chain and humans. German research has concluded that "*detailed investigation of (the) potential reproductive, neuro-, immuno-and geno- toxicity (of PCP ingredients) are lacking not only for musk fragrances, but also for the overwhelming majority of other PCP ingredients*" and that "*few information is available about their fate in the environment and their effects on aquatic organisms*".

BEUC has allocated part of its expert budget to the research undertaken to date, but further funding is needed from the Commission for BEUC to finalise the research. We think that the extra 6 months and funding would ensure that the quality work undertaken to date by Ecolabelling Norway in drafting the criteria would be strengthened, while also meeting consumer needs and perceptions on products used by every single European consumer. In this way, the credibility of the ecolabel can be strengthened and better ensured.

Apologies for the late arrival of this proposal, so close to the Ecolabel Board meeting next week. I hope the timeframe still allows for the proposal to be accepted, and I will be pleased to make a brief statement at the meeting to further explain our views.

Yours sincerely,

Doreen Fedrigo
BEUC/EEB EU Ecolabel Coordinator