

AVOID A PHOSPHATE BAN FOR THE PC&H SECTOR

Urgent need to defend the use of phosphorus-based compounds (P) in the industrial and professional cleaning sector

The background

The Detergent Regulation is being revised as part of the EU Green Deal. Following a meeting between A.I.S.E. and the Commission on 9 November 2021, the Commission indicated that regulating microbial cleaners and reducing the release of P based components in professional and industrial cleaning applications are their current priorities.

The urgency

Commission has asked for data on past and current use of P in the PC&H sector. They acknowledge that our contribution is small (about 1% of total release in Europe), but they expect similar reduction in comparison to that achieved by the restriction in household products in 2014. They are also interested in possible economically viable alternatives to P, examples / market categories where it is crucial for P to be used, and Life Cycle Analysis information. They have also asked us to compare the P contribution of our sector now to the sector's contribution before the P restriction on consumer laundry and ADW products.

In the absence of concrete data to defend the use of P in critical applications, the Commission will propose a blanket ban of P use in professional cleaning and detergent products. It is therefore in the interest of the whole sector to voluntarily provide the Commission with concrete data to defend the use of P.

Data collection

In order to respond to the Commission with concrete data, A.I.S.E. wishes to compile information from companies across Europe, including SMEs and multinationals, with this survey, to create an inventory of and to quantify actual phosphate use across Europe and identify the most critical applications for our industry. The national associations are kindly requested to forward the survey to all their member companies. [Companies active in several countries are asked to coordinate one single answer for Europe.](#)

Confidentiality

The data compiled through this survey will be treated in utmost confidentiality and accessed solely by the A.I.S.E. secretariat for the purpose of generating aggregated European figures. **No individual company and country data will be made available or published.**

Distribution: NAC (for distribution to own membership); Supporting Corporate Members SG; PC&H SG, Detergent WG, CC: Management Committee

Timing: distribution on 14 December 2021. Responses are requested to be submitted Friday by 14 January 2022 close of business. Internal aggregation will follow.

Survey questions - [respond here](https://survey.zohopublic.com/zs/g0CCya)

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1. Introduction

This survey is intended for companies that work in the industrial and professional cleaning sector. For internal compilation purposes only, please identify yourself:

- Name
- Email
- Company
- My company is a member of the following national associations:

Question 1: What is the estimated 2020 market share of products that fall under the Detergents Regulation (cleaning products, washing, auxiliaries), for the countries covered by the data provided for this survey?

Answer:

- Our estimated EU market share in 2020
- Our estimated country specific (name countries) market share in 2020



2. Compile an inventory of the current use of P and to quantify the European market

Question 2: Do you manufacture detergents, disinfectants or other cleaning products for professional use which contain phosphorus-based compounds “hereinafter called P” (phosphates / phosphonates / STPP / phosphoric acid / phosphorus-based surfactants)?

Yes/No

Answer 2a: If no (and your entire portfolio is phosphorus free), please indicate the date since when your company has no longer used any phosphorus-based compounds in its product portfolio.

Answer 2b: If yes, please indicate the total volume of P (t/year) in product formulations placed on the market for the following categories. Please express as tonnage elemental P (so 4 tonnes of STPP is 1 tonne elemental P)

	Pre-2014 (t/year)	Select one year between 2016- 2018 (t/year)	2020 (t/year)
Total volume			
<ul style="list-style-type: none"> Total P volume for company Total P volume for liquids Total P volume for powders 			
Volume per category / subdivision			
<ul style="list-style-type: none"> Cleaning & disinfection products (also falling under BPR) 			
<ul style="list-style-type: none"> Industrial & institutional laundry products 			
<ul style="list-style-type: none"> Food & beverage processing (e.g. open plant cleaning (OPC), cleaning in place (CIP), bottle wash...) 			
<ul style="list-style-type: none"> Industrial & institutional dish washing (e.g. restaurant, catering, tunnel...) 			
<ul style="list-style-type: none"> Metal cleaning (e.g. car, boat...) 			
<ul style="list-style-type: none"> Add other categories 			



3. Identify the environmental, economic etc. burden of using the alternatives to P

Question 3: Please provide specific examples of 1) the consequences of restricting P and 2) the consequences of replacing P with alternatives (examples provided, include others as relevant). Does the potential alternative fulfil the same function as the phosphorus-based compound, from an economic, sustainable and hygienic point of view? Please provide other relevant examples...

Raw material with P	Consequences with restriction of P	Alternatives	Consequences of alternatives
<p>Use free text structure and provide examples</p> <p>eg Phosphates:</p> <ul style="list-style-type: none"> • STPP • tetra sodium pyrophosphate • sodium phosphate or orthophosphate • phosphoric acid • TPP, tripolyphosphate • Tetrapotassium pyrophosphate • Na hexametaphosphate • Anhydrous trisodium phosphate • Tripotasic phosphate • sodium hexametaphosphate • GLDA-Na4 or IDS-Na4 <p>Phosphonates:</p> <ul style="list-style-type: none"> • EDTMP • EHDP Etidronic acid • EHDP (Etidronate) • EHDP (Etidronate) • DTPMP • Ca/Na EDTMP • ATMP (Amino trimethylene phosphonic acid) 	<p>Use free text structure and provide examples</p> <p>eg</p> <ul style="list-style-type: none"> • Reformulation • Cost • Reauthorisation under BPR of certain products • Other consequences 	<p>Use free text structure and provide examples</p> <p>eg</p> <p>Alternative ingredients</p> <ul style="list-style-type: none"> • MGDA • Bleach • Sodium hydroxide • Enzymes • Other anionic surfactants • <p>Potential replacement by different acids:</p> <ul style="list-style-type: none"> • Methanesulfonic acid : • Sulfamic acid • Nitric acid • Organic acids • Sulfuric acid • Chlorhydric acid • Citric acid • Methylsulphonic acid <p>Alternative process</p> <ul style="list-style-type: none"> • Using softer water? 	<p>Use free text structure and provide examples</p> <p>Economically - higher cost?</p> <p>Water - more water required?</p> <p>Energy - higher temperature required?</p> <p>Detergent - more product required (eg higher dosage for same result, higher concentration of alternatives)?</p> <p>Time – longer cycle required?</p> <p>Hygiene -alternative steps required?</p> <p>Efficacy – is alternative less efficacious?</p> <p>Damage to equipment (eg corrosion of machines, replacement of textiles)</p> <p>Other consequences</p>

<ul style="list-style-type: none"> • PBTC (2-Phosphonobutane-1,2,4-tricarboxylic acid) • HEDP (1-Hydroxy ethylidene (1,1-diphosphonic acid)) • EDTMP (Pentasodium salt solution of Ethylene diamine tetra (methylene phosphonic acid)) <p>as phosphorpentoxide:</p> <ul style="list-style-type: none"> • P2O5 			
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Question 4: Would your company be able to adhere to these proposed P limits?

Answer: Please indicate yes or no. If no, please add explanatory notes

In the revision of Regulation (EC) 648/2004 on detergents, the Norwegian authorities have proposed the following limits for the use of P in detergents, as part of their comments to the inception impact assessment. Reference: https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13116-Detergents-streamlining-and-updating-the-EU-rules/F2721930_en

Proposed limits for P	Yes	No	If no, please explain why	We do not sell this product category
a) 0.2 % for laundry detergents				
b) 3.8 % for automatic dishwasher detergents				
c) 0.2 % for liquid cleaning agents and washing-up liquids				
d) 2.5 % for cleaning agents in powder form				



e) 10 % for cleaning agents for dairies and the foodstuff industry				
f) 2.5 % for special cleaning agents for milk production and other industries				

Thank you for your participation. Your time is very much appreciated.

