

BETTER REGULATION AND SAFE USE OF PRODUCTS:

For a more effective information to consumers

A.I.S.E. Fact sheet • December 2017

BACKGROUND:

- **EU Better Regulation** agenda: Framework and a mind-set shift for potential significant improvements of the current legislative framework
- EU Commission Cumulative Cost Assessment study (2016):
 - › The overall legislation cost for the detergents and maintenance products industry amounts to approximately: **€670 million**, corresponding to **33.4%** of its profits.
 - › These costs are disproportionate for our sector compared to other sectors affected by chemicals legislation.
- Many of these legislative costs are **driven by on pack regulatory information**.

"It is important that every single measure in the EU's rulebook is fit for purpose, modern, effective, proportionate, operational and as simple as possible."

Source: European Commission - "Better Regulation for better results - An EU agenda" May 2015

THE ISSUE:

Current regulatory labels are:

- Overloaded with regulatory information requirements (overlaps)
- Not very effective in driving safe use by consumers
- Very costly to implement for industry

OUR COMMITMENT:

In the framework of the Better Regulation agenda and in particular Detergent Regulation, CLP and UN GHS discussions:

Improve the effectiveness of safe use communication to consumers via labels and other possible means, in order to make sure consumers:

- › **notice** the safety information,
- › **understand** it
- › and **act upon it to ensure safe use**.

ACHIEVEMENTS TO DATE:

- Stakeholder workshop in June 2016: Medical professionals, Poison Control centers etc and other industries also seeking opportunities for improvement.
- Qualitative and quantitative consumer research in 2016/2017 :
 - › Consumer perception and habits
 - › Assessment of alternative labels
 - › Comprehension of icons and pictograms

A.I.S.E.'S PROPOSED WAY FORWARD:

- Simplify and prioritise information on pack
 - › Promote use of icons instead of text (eg Precautionary statements)
 - › Seek to improve icons/pictograms where needed/possible (eg CLP eye hazard)
 - › Explore digitalization opportunities
- Ensure that the information is proportionate to the product's actual risks.
- Work with other interested industry sectors and stakeholders.



ASSESSMENT OF ALTERNATIVE LABELS - CONSUMER UNDERSTANDING AND PREFERENCE (QUANTITATIVE CONSUMER RESEARCH - MARCH 2017 N=1800)

- **Simpler labels** (less text, key basic safe use information, etc.) are preferred by consumers
- The principle **"the more information the better"** does not really work for consumers (short attention);
- **Safe use icons/precautionary pictograms** are useful and generally better understood than text;
- Respondents appreciate the presence of **useful information** on the labels.

Alternative 2 label
36%
"Easy to understand. Other options too complicated."

(FR) eau douce et moyenne (IT) acqua dolce e di media durezza (ES) agua blanda y media (PT) água morna e média	50 ml	65 ml	100 ml
(FR) eau dure (IT) acqua dura (ES) agua dura (PT) água dura	65 ml	80 ml	115 ml

1300 ml e

2

Alternative 1 label
44%
"A lot of Information AND easy to understand."

(FR) eau douce et moyenne (IT) acqua dolce e di media durezza (ES) agua blanda y media (PT) água morna e média	50 ml	65 ml	100 ml
(FR) eau dure (IT) acqua dura (ES) agua dura (PT) água dura	65 ml	80 ml	115 ml

1300 ml e

1

Current label
17%
"The most Information."

(FR) eau douce et moyenne (IT) acqua dolce e di media durezza (ES) agua blanda y media (PT) água morna e média	50 ml	65 ml	100 ml
(FR) eau dure (IT) acqua dura (ES) agua dura (PT) água dura	65 ml	80 ml	115 ml

1300 ml e

3

Respondents preferred the simpler and more graphical alternative labels versus the current CLP label

MAIN LABEL DESIGN ELEMENTS

- CLP / Detergent Regulation
- Safe use instructions
- Ingredient information

Label information not determined by current regulatory requirements

Prominent safe use focusing on the relevant warnings

Ingredients list on pack limited to clearly listed allergens, other info is available on-line

Flexible Interpretation

Warning phrases replaced by safe use icons when possible

Ingredients list with international names (cf. Cosmetics), including all allergens

Compliant

Multiple warning phrases in all languages
Limited space for safe use icons

Ingredients list in all languages
Allergens in two separate places

FINDINGS FROM CONSUMER RESEARCH (2016/2017) - CONTINUED:

- **Consumer perception and habits**

- ▶ Safe use behaviour is not influenced by the back label execution
- ▶ Safe use practice is determined intuitively (e.g. experience, connotation of performance, pack design), even in case of crisis

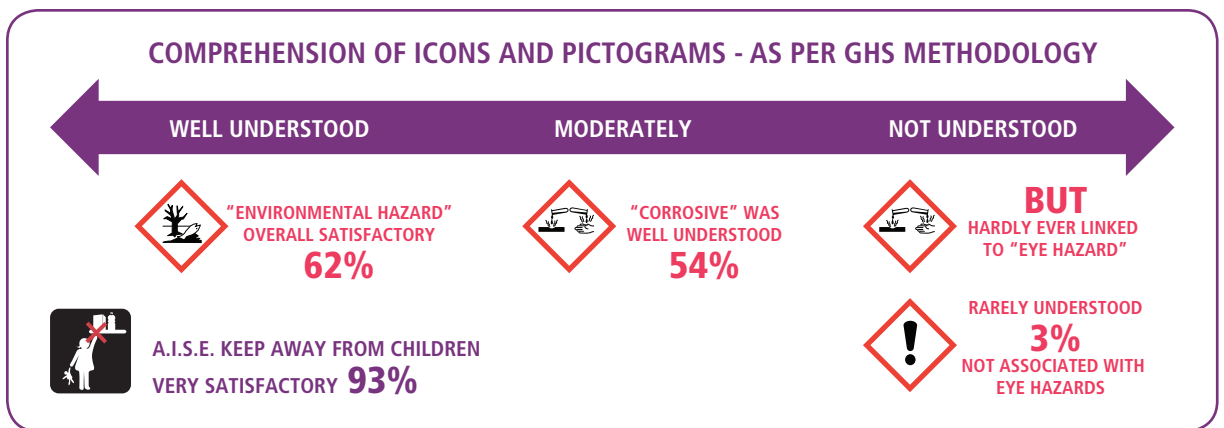
CONSUMER PERCEPTION



Consumers tend to "spontaneously" group products according to their hazard profile without even reading back labels of 3 "levels" above (NB: brands featured here are for illustrative purpose only)

- **Comprehension of icons and pictograms**

- ▶ Some issues with comprehension of labels: critical elements of CLP labels poorly (or hardly) understood
- ▶ A.I.S.E. safe use icons are more easily understood than CLP pictograms
- ▶ A.I.S.E. "Keep Away From Children" pictogram has a very high level of consumer understanding (93%)



For further information and details of the consumer research:

<https://www.aise.eu/our-activities/product-safety-and-innovation/classification-labelling/bres-project.aspx>

