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**WK 2948/2025 INIT**

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## **WORKING DOCUMENT**

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From:	Commission services
To:	Working Party on Technical Harmonisation (Dangerous Substances - Chemicals)
Subject:	Detergents Regulation Refill sale of detergents : PPT presentation

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WK 2948/2025 INIT

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# Refill sale of detergents

*DG GROW*

*Unit F2-Bioeconomy, chemicals, cosmetics*

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# Facts and figures

Refill sale of detergents

# Impact Assessment findings (1)

- The refill sale at refill stations of detergents currently comprises approx. 2% of the overall market for detergents
- One of the most promising areas for innovation and investment from the industry
- Great potential for growth
- Non-compliance with the labelling requirements
- Lack of clarity on applicable requirements
- Reduction of costs for companies, notably SMEs, and simplification (packaging, labelling,... )

# Impact Assessment findings (2)

- **Offers significant environmental benefits:**
  - i. Reduction of packaging and packaging waste: under the baseline the reduction of plastic waste as a result of refill sales would (based on the most modest calculations) amount to at least **33,000 tonnes per year.**
  - ii. Reduction of use of paper and paper waste as a result of the need to change labels less frequently and dispose of non-compliant (unused) labels

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# Regulatory framework

Refill sale of detergents

# Three new pieces of Union legislation for refill

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1. The Classification, Labelling and Packaging Regulation (CLP)
2. The new Detergents Regulation
3. The Packaging and Packaging Waste Regulation (PPW)

\*The relevant requirements apply cumulatively

# The CLP Regulation

- Regulates the refill sale of hazardous chemicals
- Defines refill and refill station
- Lays down restrictions on refill for certain hazard classes
- Includes requirements that refill stations need to meet
- Requires that a print-out of the label is available at the refill station

# The PPW Regulation

Articles 3(33) and (34), 28, 32 and 51, Annex VI, Part C, [Regulation - EU - 2025/40 - EN - EUR-Lex](#)

- Definition of refill and refill station
- Sets targets for re-use and refill
- Requires operators to inform consumers on the refill rules (what containers can be used, hygiene rules)
- Sets out obligations for operators as regards the refill station

# The detergents proposal

- Explicitly covers the refill sale of detergents
- Definition of refill and refill station
- Introduces a general labelling obligation – Art. 15(1)
- Allows for the full digitalisation of labels of refill detergents, with the exception of dosage instructions for consumer laundry and consumer automatic dishwasher detergents.
- Clarifies the obligations of economic operators in the supply chain as regards refill detergents, notably regarding **labelling** – Art. 15(2)
- Requires that the data carrier giving access to the digital label is available at the refill station

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# In practice

Refill sale of detergents

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FORMULE

SANS JAVEL

SANS AMMONIAC

C'est un nettoyant pour la salle de bains, pas seulement un anticalcaire!

1 ON/OFF 2 3 4

Pour les surfaces très calcaires: laisser agir 3 min. avant de rincer. /  
Hardnekkige oanslag: laat tot 3 min. intrekken en daarna goed afspoelen.

(FR) (BE) (LU) Contre-taquiné sur: les surfaces chaudes, abîmées ou sensibles aux acides (par exemple l'or, l'argent, le cuivre, l'aluminium). Évitez le contact avec les appareils électroménagers (y compris les bouillottes), la pierre naturelle (par exemple le marbre et le travertin). En cas de doute, tester d'abord sur une surface non visible. (NL) (BE) Niet gebruiken op warme, beschadigde of gevoelige oppervlakken (bijv. goud, zilver, koper, aluminium), gekleurd of oud/beschadigd email, hardnekkige oorslag (oec. waterkokers), natuursteen (bijv. marmer, travertien). Bij twijfel, eerst testen op een klein deel uit het zicht.

(FR) (BE) (LU) Spray Anti-Calcaire. Attention. Provoque une sévère irritation des yeux. Provoque une irritation cutanée. Tenir hors de portée des enfants. EN CAS DE CONTACT AVEC LES YEUX: Rincer avec précaution à l'eau pendant plusieurs minutes. EN CAS DE CONTACT AVEC LA PEAU: Laver abondamment à l'eau. Ne pas respirer les aérosols. Ne pas mélanger avec de l'eau de Javel ou d'autres produits ménagers. (NL) (BE) Kalkreiniger Spray. Waarschuwing. Veroorzaakt ernstige oogirritatie. Veroorzaakt huidirritatie. Buiten het bereik van kinderen houden. BIJ CONTACT MET DE OGEN: voorzichtig afspoelen met water gedurende een aantal minuten. BIJ CONTACT MET DE HUID: Met veel water wassen. Spuitnevel niet inademen. Niet vermengen met andere schoonmaakproducten (bleekmiddelen of enig ander onderhoudsproduct). (BE) (LU) Kalkreiniger Spray. Achtung. Verursacht schwere Augenreizung. Verursacht Hautreizungen. Darf nicht in die Hände von Kindern gelangen. BEI KONTAKT MIT DEN AUGEN: Einige Minuten lang behutsam mit Wasser spülen. BEI BERÜHRUNG MIT DER HAUT: Mit viel Wasser waschen. Aerosol nicht einatmen. Nicht mischen mit Bleichmitteln oder anderen Reinigungsprodukten.

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Praxo & Gamble International Operations SA, 47 route de Saint-Georges, 1213 Petit-Lancy, Switzerland.

(EU) P&G BCE BV Belgium Dist. Div., Terzelsion 100, B-1853 Strombeek-Bever, Belgium

(www.info-pg.com) (FR) (BE) (LU) INGRÉDIENTS: <5% Agents de sur face non ioniques; Parfums, Benzyl salicylate, Hexyl cinnamal, Linumena. (NL) (BE) INGREDIËNTIËN: <5% Niet-ionogene oppervlakteactieve stoffen; Parfums, Benzyl salicylate, Hexyl cinnamal, Linumena. (BE) (LU) INHALYSSTOFFE: <5% Nicht-ionische Tenside; Duftstoffe, Benzyl salicylate, Hexyl cinnamal, Linumena.

700ml

(FR) Pour les surfaces en contact avec les aliments, rincer à l'eau potable.

\*Original/Classic, notre produit le plus vendu, depuis volumes Acit 2021-Août 2022.

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## Example – refill label Hazardous detergent

- A hazardous refill detergent would always bear a physical label with CLP labelling requirements (e.g. P or H statement + pictogram) - **CLP**
- The only information that would be missing is the one highlighted in yellow – **DR (voluntary)**
- A data carrier would be physically present on the physical label giving access to the labelling information under the DR - **DR**
- The same data carrier would be visible at the refill station - **DR**
- A print-out of the label available at the refill station – **CLP**
- Alternative means – **CLP + DR**

# Zoom in on the labelling information

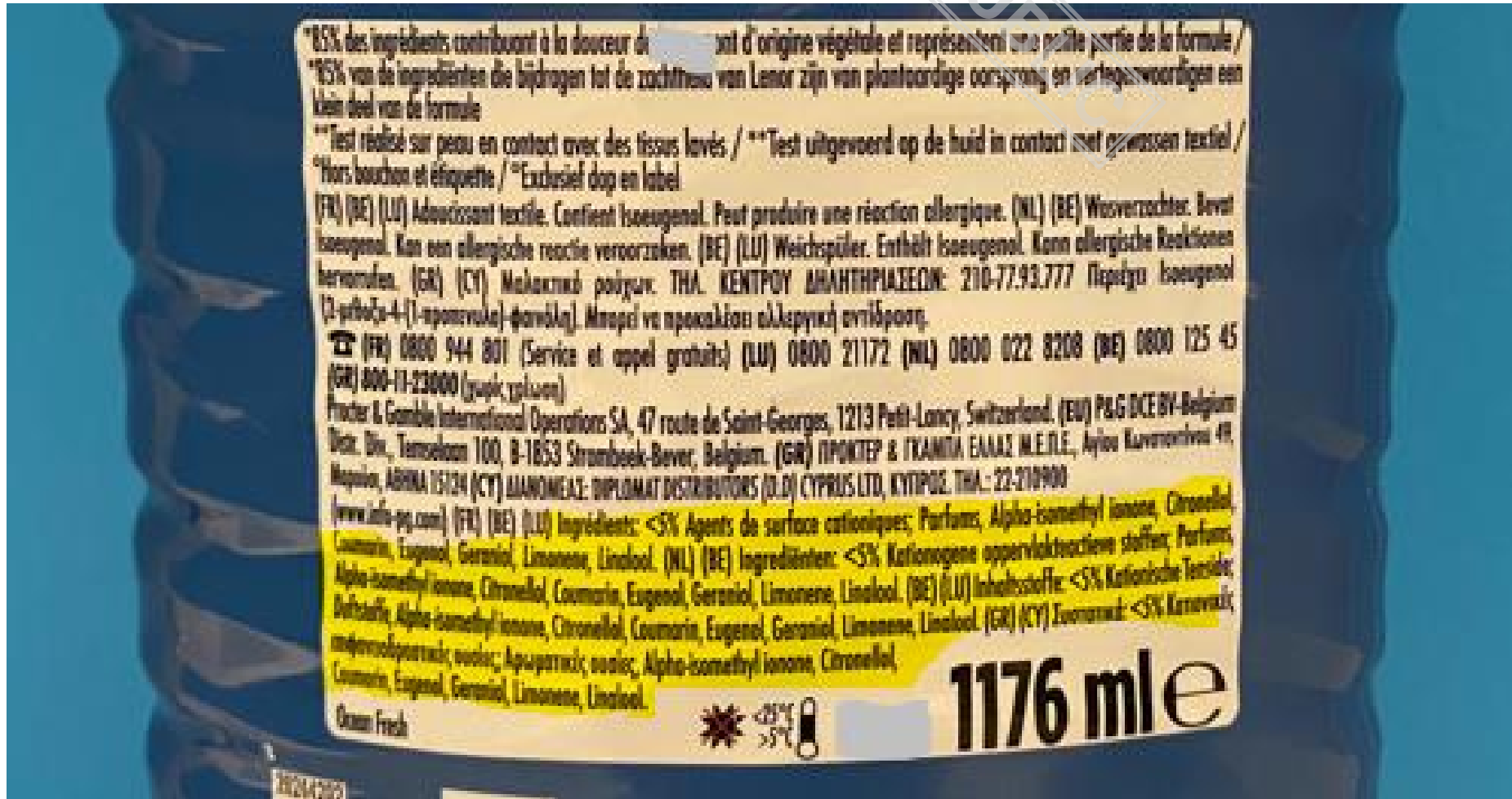




## Example – refill label Non - hazardous detergent

- A non-hazardous refill detergent may not always bear a physical label
- The information highlighted in **yellow** may be provided **only** digitally
- A data carrier would be provided to the end user giving access to the labelling information
- The same data carrier would be visible at the refill station
- Alternative means

# Zoom in on the labelling information



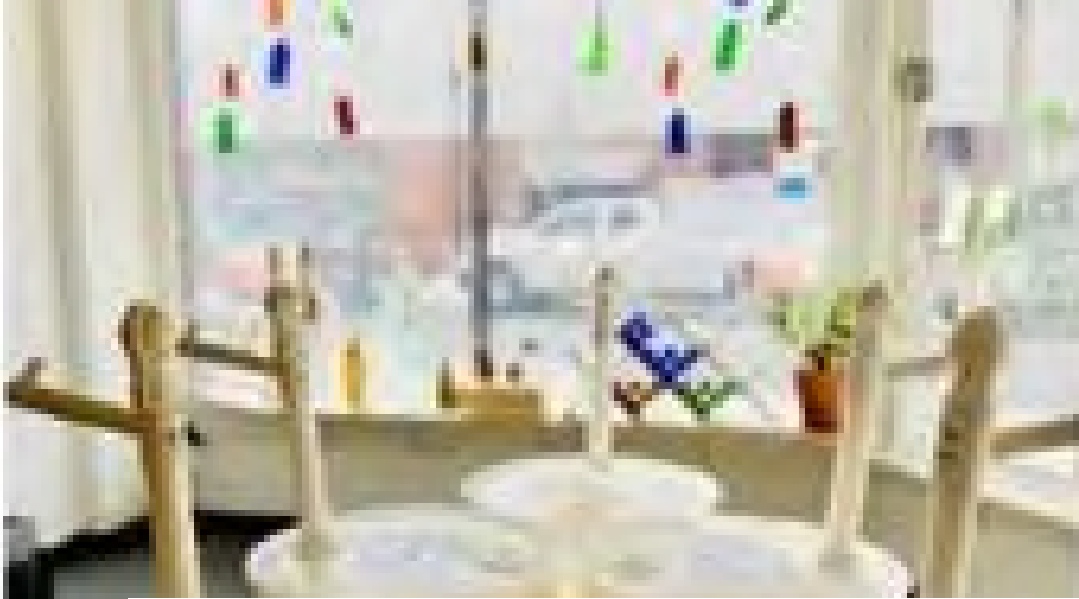
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# Forms of refill

Examples of types of refill stations currently available on the market

# Manual refill stations





## Manual refill stations

- Refill stations with manual pumps, faucets or taps
- Consumers can fill in their own bottle
- Labelling information is available on the big container that is used to refill own bottle
- Consumers usually pay based on ml bought/weight of the product
- **No label is provided in most cases**



## Manual refill stations

- The refill station is available next to pre-packaged detergents
- A basic reservoir to catch drips and overflow is available
- The design seems to limit the type of bottles that can be placed and refilled
- **Unclear whether a label is provided at the exit**

# Semi-automatic refill station



- Refill process takes place automatically
- The refill station recognises specific receptacle **already bearing a label**
- Consumer may need to hold the receptacle in place for it to refill

# Fully-automatic refill station

- Refill process takes place **automatically**
- The refill station recognises specific receptacle **already bearing a label**
- The receptacle 'locks' in the refill station – minimizes the risk of accidents







## Current practices – Lidl pilot

- Clear instructions on how to use the refill station
- Pre-labelled pouches to be refilled
- **Fully automated refill stations** to prevent accidents and spills, recognizing only the specific container
- The refill stations recognizes the pouch, which locks on the refill station during the refill process
- Unclear whether pouch can be re-used

# Key take-aways

- The refill sale of detergents is one of the sectors that can significantly contribute to the reduction of packaging and packaging waste and to meeting the targets set under the recently adopted PPW Regulation
- Refill sales can offer significant environmental benefits but also a reduction of regulatory burden for business and simplification of the rules, especially for SMEs
- **Safeguards are in place** to ensure that while meeting those objectives, consumer safety would not be compromised

# Thank you

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