

WEBINAR ON INDOOR AIR QUALITY AND A.I.S.E. PSP ON AIR FRESHENERS 22 JAN 2020

PARTICIPANTS Q&A

Questions received on the Perception of VOCs and Chemicals in the Media

Which relevance have VOC's in air fresheners in terms of health safety? Consumers are worry on it too.

Volatile organic compounds (VOCs) are organic chemical compounds that evaporate easily at room temperature. There are hundreds of VOCs all around us in our daily lives and there are both natural and man-made sources of VOCs. By definition, anything that has a smell has VOCs and they are released in large quantities by trees (especially pine varieties), fruits (especially citrus), and also through human respiration. Each VOC must be considered individually and just like any other ingredient, VOCs undergo a rigorous safety assessment when used in any product.

The A.I.S.E. PSP on Air Fresheners takes measures on three ingredients that were highlighted as of concern (benzene, naphthalene and formaldehyde). The PSP ensured products are placed on the market where the emission of these three substances are below the strictest recommended WHO limits and thus goes beyond the current regulatory requirements.

There is a lot of negative press about "chemicals" in general, as opposed to naturals. general population thinks chemistry is bad. Could A.I.S.E help educating consumers that not all synthetic products are bad?

A.I.S.E. carries out a lot of activities to demonstrate the responsible action of the detergent and maintenance product industry. We recently published our consumer website www.cleanright.eu/ with material in all European languages, which seeks to educate consumers on our industry products. The website www.cleanright.eu can be found on millions of product packaging all over Europe.

Finally, activities like the A.I.S.E. PSP on Air Fresheners are expressly designed to show proactive industry action to ensure safe use of products.



Questions received on the PSP Criteria

Do sensitising ingredients only have to be showed on the website if they exceed a certain level, e.g. the limit for CLP labelling?

Yes, only ingredients that are present above the threshold levels listed in accordance with the provisions of Annex VII D of Regulation (EC) No 648/2004 or sensitising substances that are subject to labelling requirements by Regulation (EC) No 1272/2008 must be published on the website.

Shouldn't sensitizers be on the label, when considering safety? Not everywhere all People can Access Internet all times. Users should see it on the label.

The A.I.S.E. position is that due to overcrowding of products labels only key information should be left on pack and other info should be online. A.I.S.E. has carried out studies showing the consumers spend, on average, 22 seconds reading the on-pack label, regardless of content. This is why we ask companies joining the PSP to place the phrase on pack: “people suffering from allergies ..” so as to highlight the important message on how to act, rather than a list of ingredient names which could not mean much to a consumer.

Testing of combustible AF is done for 'representative products'. Is there any guidance how to pick such representative products and is there a minimum number?

No there are no minimum number of products. The company must decide the basis on which the tested products are representative of their portfolio. Examples of grouping justification could be:

Example 1:

If a company's portfolio of combustible air fresheners produced can be divided in four families, we would accept four tests. Example of how grouping could have been done: Two different fragrances are used in the formulations, which allow splitting the candles in two groups. For the two groups, two different wicks are used in 3/8 different shapes given to the candles. Therefore, each group can be split into two sub groups. No further differentiation is needed based on the formulation because two different vegetable waxes can be used but they do have the same hazard profile and identical burning point. A company needs to be able to explain why the group of candles would result in similar emissions.

Example 2:

If a company can group their combustible air fresheners portfolio into groups with similar characteristics, testing efforts can be reduced by focusing on the air freshener(s) within this group that has/have the worst expected emissions based on expert assessment. If these “worst case” candles meet the emission requirements, it can be reasonably assumed that the other candles in this group are fine too. Here is an example:

You have different shapes and sizes of scented candles, e.g. filled glasses in different sizes and pillar candles in different diameters, and use various different fragrances.

Firstly, you identify the sizes that have the highest hourly burn rate within these different shapes, typically those with the largest diameter and therefore the largest wick, and take these as the “worst case” candles in terms of shape and burn rate.



Secondly, you look at all different fragrances you use in your candles. Take the candles with the highest fragrance load as the “worst case” candles in terms of fragrance. It might also make sense to test different fragrances if their characteristics are significantly different.

In order to be compliant to the PSP, you need to give a reasoning behind your grouping, demonstrating why the tested candles are expected to emit the highest emissions within this group.

Does participation in PSP have to cover the entire product range?

As it stands yes. However, more guidance on this may be provided on this point in the future.

Is there different guideline/program for use in Professional industry (hotel, restaurant, care home)?

Not at the present.

Questions received on the exposure assessment models presented

Can the BAMA model (or the other model presented) also be used for calculations on other substances in the air care product as well?

Yes, the models are not designed for specific substances, so not limited to only formaldehyde, naphthalene and benzene. This is the methodology that is used for REACH compliance so you can rely on the same experts/tools/process/consultant that you follow for REACH in order to carry out such an assessment. There are various open access tools available to do this.

These links bring to guidance that provide a lot of information on how to do this & links to the tools. These are some of the most frequently used tools that require less substance specific data and offer different levels of conservative estimation of exposure:

- A.I.S.E.SCEDs
https://echa.europa.eu/documents/10162/22788232/aise_sceds_explanatory_document_v1-1_oct2017_en.pdf/c2b2c440-46be-3948-cecf-4713bcdd48c7
- ECETOC TRA <http://www.ecetoc.org/tools/targeted-risk-assessment-tra/>
- BAMA/FEA Indoor Air Model Building Exposure Scenarios
<https://www.bama.co.uk/publications.php>

Questions received on the potential developments regarding labelling that were ongoing in France

Regarding the potential different labelling in France by colour coding. What are the product groups that are considered? is this all Indoor used products?

The product groups right now are not defined. Measures from the authorities could concern all categories of consumer products. Detergents and air fresheners were cited, however there is still no clarity yet what could be the extent of products covered.



Regarding the potential score system in France, would it be based on emission test data only? Would standardised exposure models be used too?

It is still not known and thus it is not clear on what could be the methodology for the Ménage Score for 60 MILLION consumers that is being proposed. We know it will consider both environment and health. However, it could be based on the substances contained in the products or on emission testing. We do know that in the past the French ministry has proposed a scoring system based on emission of VOC. As for products to be covered – in will include not only ours but probably also other sectors.

Is the French system developed by 60 Million consumers or the French government? what if score manager is again based on hazard evaluation vs risk/exposure? Will A.I.S.E try to influence?

It is to be clarified that there is no French system today, only results from 60 million consumers that are being proposed as a possible future system. We know that the government is currently reflecting on implementing a “toxiscore”, but we are still not clear on what it could be: if it will be solely hazard based, rather than based on risk. We are discussing with French authorities.

Initiatives like the A.I.S.E. PSP on Air Fresheners, that show responsible industry action can allow us to influence such activities at national level.

Why do you discuss with the French Government? Wouldn't it be better to discuss on EU Level. We should avoid local activities, when considering global Impact.

This is actually one of the key benefits of the A.I.S.E. PSP for Air Fresheners in being a European solution that can be proposed to authorities, rather than activity at national level. The A.I.S.E. PSP was in fact used in the past to mitigate activity at national level by establishing a European activity.

