

A·I·S·E

International Association for Soaps,  
Detergents and Maintenance Products

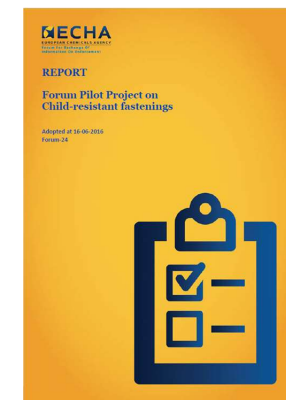
# Learnings from the 2016 Forum pilot project on child-resistant fastenings and AISE safe use campaign

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ECHA FORUM  
14<sup>th</sup> November 2018

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[www.aise.eu](http://www.aise.eu)

# Main findings Forum project

2016 Forum's Pilot Project on CRF identified a ***“relatively high non-compliance rate” with on package safety measures.***

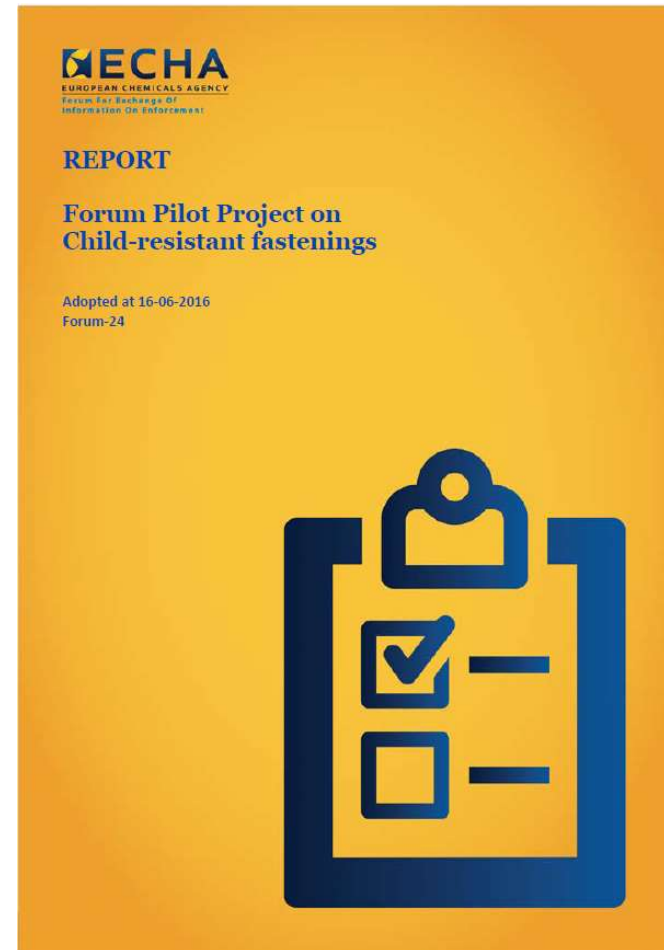
Reported statistical analysis suggests that a majority issues relate to CRF and TWD.



# Main findings Forum project

Involved actors were mainly non-traditional supply chain actors (e.g. retailers, wholesales, distributors) and SMEs

Whilst not solely responsible for the non-compliance observed, these supply chain actors are arguably ill-equipped to deal with CLP obligations.



# Examples Of Non-compliances

The nature of non-compliance indicates that non-traditional supply chain actors and SMEs are probably not well aware of CLP obligations related to CRF and TWD:

- Difficult to prove that the certificates of conformity corresponded to the packaging inspected
- Ambiguous CRF certificates (without reference to the product);
- Certificates untrustworthy or expired
- Lack of collaboration in the supply chain



# Examples Of Non-compliances

The nature of non-compliance indicates that non-traditional supply chain actors and SMEs are probably not aware of CLP obligations related to CRF and TWD:

In the course of the project the inspectors received a total of 519 certificates<sup>5</sup> for re-closable and non-re-closable packages. 63 of these certificates were issued by laboratories which were not accredited according to EN ISO/IEC 17025.

There was a total of 85 cases of products (83 products with re-closable packaging and 2 products with non re-closable packaging), for which a certificate was requested but not provided within the timeframe of the project.



# Examples Of Non-compliance II

Of these, 69 products were not fitted with a TWD and in 8 cases even though the TWD existed, it was not prominent on the surface of the packaging.

It is also important to note that there were two cases of products with re-closable packages reported where, even though a certificate of conformity with the ISO 8317 standard was available and issued by an EN ISO/IEC 17025 accredited laboratory, the manual inspection performed by the inspector proved that the products were not secure. For example, inspectors noted that the correct torque was not applied on the filling line



# AISE recommendations

Considering the “*relatively high non-compliance rate*” identified by the Forum, AISE provided advise to its members:

- Periodically review product classifications, evaluate packaging obligations particularly in relation to CRF and TWD.
- Ensure that packaging conformity certificates are readily available in the supply chain.
- Ensure packaging is certified by an EN ISO/IEC 17025 accredited laboratory.



# Forum recommendations

Forum recommended that awareness of the requirements of Article 35(2) CLP should be increased amongst retailers and distributors.

Probably a significant proportion of non-compliance can be attributed to ignorance and/or a lack of resources.

Further, the large sample size (797 products from 15 EU/EEA member states were inspected) means that the findings can reasonably be representative of the EU situation.





# AISE proposal for a joint initiative

A.I.S.E. proposes to promote Forum's recommendation to industry, in particular supply chain actors such as retailers, distributors and SMEs.

Due to the broad audience, A.I.S.E. suggests that relevant trade associations, national enforcement authorities, ECHA and Commission (via the European Enterprise Network) work together to develop a framework to support raising awareness on safe use packaging: nutshell guidance, check list, awareness raising/outreach activities.

Thought starter has been prepared.

[www.aise.eu](http://www.aise.eu)

# WHY OUTREACH?

For numerous reasons, adopting an outreach based approach is the optimal solution.

## The Stakeholders and Target Audience:

- There is no single enforcement authority, agency, trade association that can engage with such diverse and diffuse target audience in its entirety.

## Nature of the Identified Non-Compliances:

- Many of the issues identified are procedural issues, manifesting as regulatory non-compliance. Enforcement can help drive change in individual organisations, outreach can help drive change in the wider industry.

## Fairness:

- Small, non-traditional supply chain actors should encouraged to improve before being subject to enforcement action. Large, traditional supply chain actors are noticeable for their lack of representation in the Forum's report.

## The Objective is Harmonised:

- Ultimately, all parties want to ensure that vulnerable members of society are adequately protected from accidental exposure to hazards chemicals. [www.aise.eu](http://www.aise.eu)



# DISCUSSION

This proposal is intended as a discussion starter. Therefore, feedback is welcome and encouraged!



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# Keep Caps From Kids Campaign Update



[www.keepcapfromkids.eu](http://www.keepcapfromkids.eu)

 **ECHA's Forum, 14 November 2018**

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# Update on Keep Caps From Kids/Capsules Policy context and main initiatives



2013                      2014                      2015                      2016                      2017                      2018                      2019



<p><b>A.I.S.E. PSP 1: (LLDC)</b> opaque packaging, bittering agent, on pack + PCC</p>	<p><b>A.I.S.E. PSP 2: (LDC)</b> Resistance test Mandatory safety warning on all ads</p>	<p><b>A.I.S.E. PSP 3:</b> Standard for child impeding closures, advertising code of conduct</p>
<p>Regular reporting by A.I.S.E.</p>		

**A.I.S.E. KEEP CAPS FROM KIDS  
WAVE 1**

**KCFK  
WAVE 2**

A.I.S.E.  
Accidentology study

**Commission Regulation (EU) 1297/2014:**  
labelling, outer packaging, aversive agent, film integrity



See <https://www.aise.eu/our-activities/product-stewardship-programmes/liquid-detergent-capsules/aise-product-stewardship-programme-for-liquid-laundry-detergent-capsules-122012.aspx>

EU COM  
Liquitabs  
study

# Keep Caps From Kids – Campaign outline

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**Overall objective:** Secure the safe use of liquid laundry detergent capsules and avoid incidents, notably by getting the users to close the pack and store the capsules away from children.

Do so by driving traffic to the common industry website  
[www.keepcapsfromkids.eu](http://www.keepcapsfromkids.eu)

**Target group:** Parents with young children (<5 years and especially between 12-36 months old) and carers of such children

## **Campaign principles:**

- Initiated in July 2014 ; extended since July 2015 onwards
- Led by A.I.S.E. and its network of National Associations
- Developed and financed by LLDC companies & sponsors
- Common industry campaign and messages ; pan-European
- Website/on pack/via advertising
- Open to external partners to amplify the message



**e.g. EU/National Authorities, Ministries of Health,  
Poison Control Centers, NGOs**

[www.aise.eu](http://www.aise.eu)



# KEEP CAPS FROM KIDS – KEY MILESTONES



**A.I.S.E. KEEP CAPS FROM KIDS WAVE 1 and 2** (2014-2017)

**KCFK WAVE 3** (2018-2019)

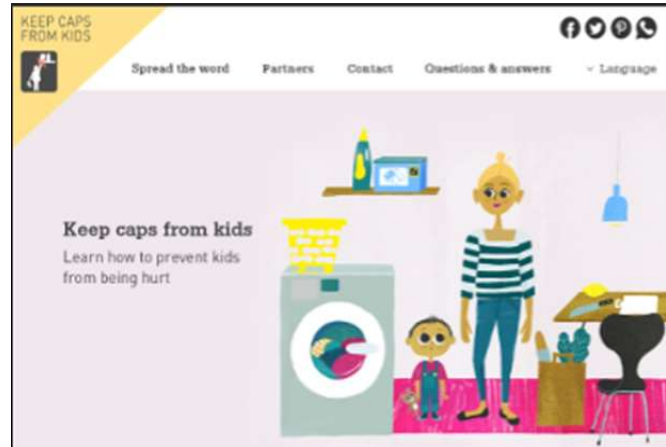
INDUSTRY CAMPAIGNS

A.I.S.E. media campaign EU 28

O E C D t w i t

Pilot stakeholder campaigns in DE, FR, IRL, ES

Pilot SEA campaign UK/FR



# Sponsors & partners in 2018



3 sponsor companies

21 partners: institutions / PCCs / suppliers



accidents don't have to happen



Cluj School of Public Health  
College of Political, Administrative and Communication Sciences  
Babeş-Bolyai University Cluj-Napoca, Romania



NEYTENDASTOFA



070 245 245



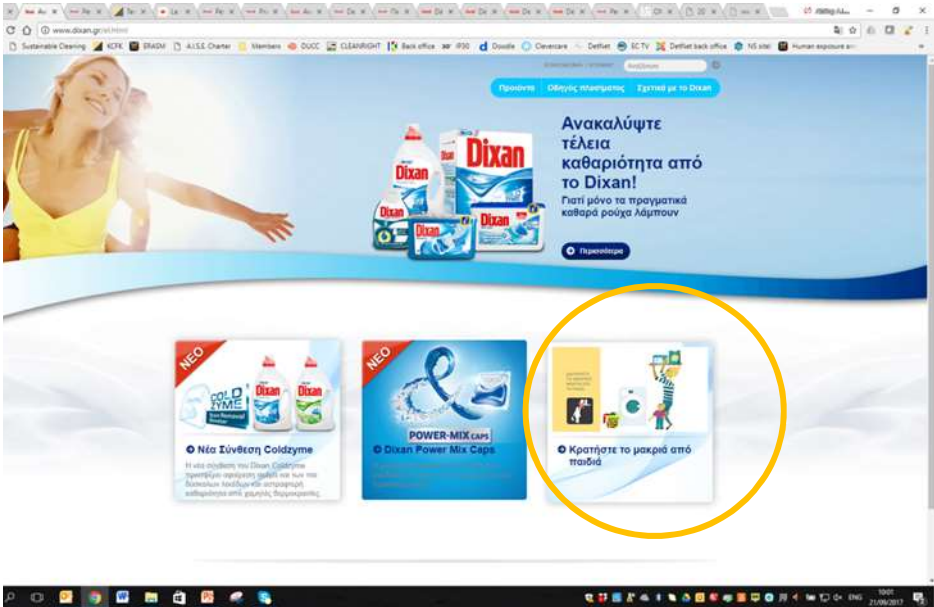
[www.aise.eu](http://www.aise.eu)



# Examples of brands' activities / amplification



- ⇒ On pack labelling requirements
- ⇒ Mandatory safety message on all brands' advertising
- ⇒ Mandatory feature of the [www.keepcapsfromkids.eu](http://www.keepcapsfromkids.eu) website and visual on the brands' websites



# Pilot campaigns with paediatricians and health professionals

DE (IKW)	FR (AFISE)	IRL (IBEC)	SP (ADELMA)
Partner with BAG (joint) and through 6000 paediatricians (42%potential- plan: reach 25%)	Agreement with National Federation of Creches; Promotion of leaflet + Leaflets distributed in doctors' waiting room Advertorial in <a href="http://www.MagicMaman.com">www.MagicMaman.com</a>	Partnership with National HSA under discussion to share material	Contacts with 23 associations to promote message
March 18 onwards	Sept 18 onwards	Mid 18	Mid 18
100 000 leaflets printed so far (distributed at U5 preventive visit, 6-8 months)			

## 7 Tipps zum sicheren Umgang mit Wasch- und Reinigungsmitteln zu Hause



**1** Lagern Sie Wasch- und Reinigungsmittel immer außer Reichweite von Kindern. Achten Sie beim Gebrauch darauf, dass Kinder nicht in Kontakt mit den Mitteln kommen.



**2** Verschließen Sie die Verpackung nach dem Gebrauch fest und sicher.



**3** Legen Sie Waschmittel-Gelkapseln („Caps“ und „Pods“) sofort in die Waschtrommel, geben Sie die Wäsche hinzu und schließen Sie die Tür.



**4** Füllen Sie die Wasch- und Reinigungsmittel nie in Lebensmittelgefäße (z.B. Getränkeflaschen, Tassen, Konservengläser) um, Bewahren Sie die Mittel immer in der Originalverpackung auf.



**5** Beachten Sie die Anwendungs- und Sicherheitshinweise auf der Verpackung.

**6** Erklären Sie Ihren Kindern, dass Wasch- und Reinigungsmittel für sie tabu sind.



**7** Wenn doch einmal etwas passiert: Bewahren Sie Ruhe und beruhigen Sie das Kind. Rufen Sie das Giftnotrufzentrum an.



# French leaflet- Sep 18

## 100 000 copies distributed via crèches



**TENEZ LES CAPSULES DE LESSIVE HORS DE PORTÉE DES ENFANTS**

**Apprenez à protéger vos enfants**

[www.keepcapsfromkids.eu](http://www.keepcapsfromkids.eu)

### QUE FAIRE EN CAS D'URGENCE ?

Gardez votre calme afin d'aider l'enfant

**INGESTION**

Contactez le centre antipoison de votre région ou votre médecin

Si l'enfant ne vomit pas, ne tentez pas de provoquer cette réaction

**CONTACT AVEC LES YEUX OU LA PEAU**

Rincez soigneusement à l'eau pendant plusieurs minutes

Contactez le centre antipoison de votre région ou votre médecin

**MÉDECIN**

- Quand l'événement s'est-il produit ?
- Quels sont les symptômes ?
- Avez-vous procédé à des premiers soins ?
- Lesquels ?
- Quel est l'âge et/ou le poids de l'enfant ?
- L'enfant a-t-il des allergies connues ?
- Quelle quantité a été ingérée ou est entrée en contact avec les yeux ou la peau ?
- Notez qu'une capsule renferme 25 à 30 millilitres de produit.
- Quelle est la marque de la lessive ?
- Enfin, pensez toujours à garder l'emballage d'origine ou l'étiquette du produit à portée de main.

**COMMENT CONTACTER LE CENTRE ANTIPOISON**

ANGERS : 02 41 48 21 21	NANCY : 03 83 22 50 50
BORDEAUX : 05 56 96 40 80	PARIS : 01 40 05 48 48
LILLE : 0800 59 59 59	STRASBOURG : 03 88 37 37 37
LYON : 04 72 11 69 11	TOULOUSE : 05 61 77 44 47
MARSEILLE : 04 91 75 25 25	

**COMMENT UTILISER DES CAPSULES DE LESSIVE LIQUIDE EN TOUTE SÉCURITÉ**

Tenez toujours les capsules de lessive hors de portée des enfants. On ne sait jamais jusqu'où la curiosité peut les conduire. Même si vous leur avez dit de ne pas toucher aux capsules.

Pour plus de conseils de sécurité, consultez : [www.keepcapsfromkids.eu](http://www.keepcapsfromkids.eu)

Placez directement la capsule dans la machine et refermez immédiatement le hublot ou le volet. Ne laissez jamais de capsules à la portée des enfants.

Refermez correctement le paquet.

Conservez toujours les capsules hors de portée des enfants

Conservez le paquet sur une étagère en hauteur ou dans un placard équipé d'un dispositif de sécurité.

Conservez toujours les capsules dans leur emballage d'origine.

Les dispositifs de sécurité empêchent les tout-petits d'explorer les endroits potentiellement dangereux pour eux.

Conserver hors de portée des enfants  
 Refermez correctement le paquet.  
 Ne pas percer, déchirer ni couper  
 Manipuler avec des mains sèches



# Join the campaign !



Joining KCFK as partner is FREE, by simple e-mail to A.I.S.E\*..

As partner, we propose that:

- Your organisation name and logo as « Campaign Partner » will continue be featured on the campaign website.
- You will have free access to the Campaign Toolkit with the Campaign assets and will be entitled to use those on your own communication channels.
- You will continue to be regularly updated by A.I.S.E and its member Associations on the topic.



\* confirming that you are supportive of our campaign as per project description available

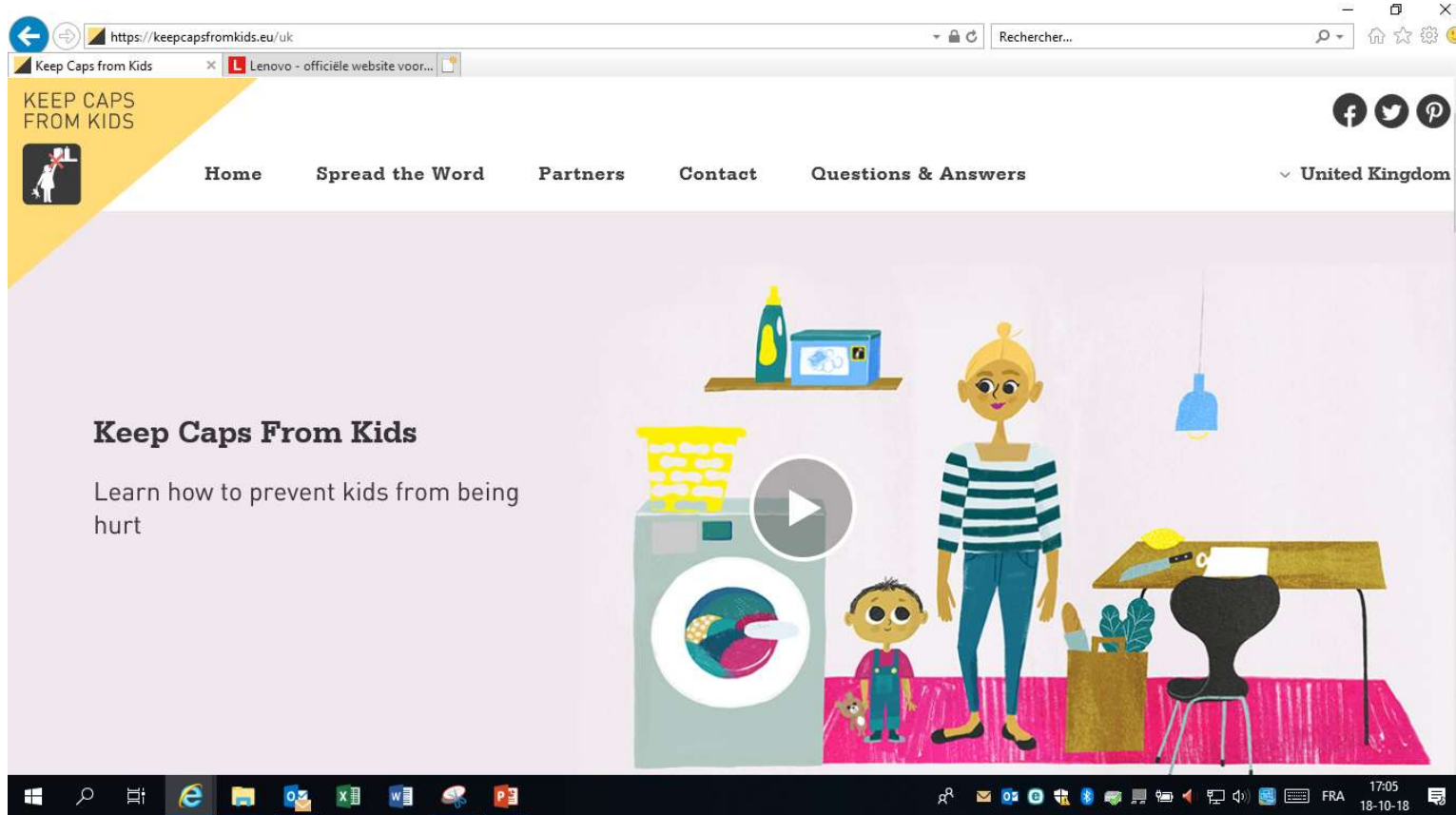


here <https://www.aise.eu/documents/document/20170914100642->



[project\\_description\\_keepcapsfromkids\\_final14sept17.pdf](#)





<https://keepcapsfromkids.eu/uk>

**THANK YOU VERY MUCH**

*In case of any question, please contact  
A.I.S.E. [valerie.sejourne@aise.eu](mailto:valerie.sejourne@aise.eu) or  
[aisling.okane@aise.eu](mailto:aisling.okane@aise.eu),*

*or call us via: + 32 2 679 62 69*

[www.aise.eu](http://www.aise.eu)

