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## Revision of the Detergents Regulation: EuropaBio policy asks for Microbial-based Cleaning Products

EuropaBio welcomes the Revision of the Detergents Regulation. This is a positive development in supporting access to market for innovative products, in line with the EU Chemicals Strategy for Sustainability and overall EU Green Deal objectives for sustainability.

We support revision of the following points in annex II on microbial based cleaning products (MBCPs) to ensure that requirements are risk-based considering the safety, efficacy, and sustainability profile of products:

- **Annex II, point 1:**
  - **Microorganisms should be fully identifiable**, but it is not necessary to specify the American Type Culture Collection (ATCC) when there are several other well-established culture collections.
  - For identification purposes, the requirement for 16s ribosomal DNA should be replaced with a **more reliable identification method** such as Whole Genome Sequencing.
  - The **microorganisms used should be safe**, even if not present on the Risk Group I or QPS list.
- **Annex II, point 2:** We fully agree to the exclusion list of pathogens in the final product but **the reference to strain in the text is incorrect and should be deleted**. The final product shall be free of pathogenic microorganisms.
- **Annex II, point 3:** The primary focus should be to assess the safety of genetically modified microorganisms deliberately released into the environment, rather than completely excluding their use in detergents. **The text should be amended to include a reference to Directive 2001/18/EC** on deliberate release of genetically modified microorganisms into the environment which provides guidance on the preparation of an environmental risk assessment (ERA) and on the establishment of an environmental monitoring plan.
- **Annex II, point 6:**
  - **There should not be an additional requirement for minimum shelf life for MBCPs compared to conventional detergents**. This requirement should be amended to include that the product is stable for the declared period of shelf life.
  - **Delete the requirement of <10% microbial count decrease**. The key requirement should be that the product is stable for the declared period of shelf life.
- **Annex II, point 7:** Animal tests should only be performed as a last resort, particularly where other tests can provide information to address concerns. **The text should be amended to include this nuance and prioritize other tests** such as immune tests or particle size distribution measurements.

- **Annex II, point 9 and 11:** Producers should be able to perform tests related to functionality and marketing claims themselves, rather than requiring an external lab. This requirement should be removed.
- **Annex V, point 6(a):** Further clarification and guidance is needed for the point on ‘surfaces in contact with food’. **This point shall be amended to refer to “instructions or special precautions, where relevant” to address safety concerns.**

### Biotechnology – a key enabler for the circular economy and the green transition

Biotechnology drives EU growth, with an average annual growth rate of 4.1%. This is more than twice as fast as the EU overall economy. Biotechnology generates highly effective value chains across Europe, outperforms highly productive industries, and contributes to growth through R&D. The scientific and technological progress of the industry should be recognised and supported by enabling and pragmatic regulatory frameworks.

Industrial biotechnology uses microorganisms and their fermentation products (e.g., enzymes, vitamins) in sectors such as food and feed production, agriculture, consumer products, health, and the chemical industry. Some innovations in industrial biotechnology rely on the genetic improvement of production microorganisms. This is accomplished using constantly evolving techniques, tools and methods, including NGTs.

The biotechnological optimisation of microorganisms results in both efficiency and sustainability benefits, such as higher yields of the intended molecules (e.g. amino acids, vitamins, or enzymes), elimination of genes that are of potential safety concern, improvements in the utilisation of nutrients, energy and water, and a lower environmental footprint.

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#### About EuropaBio

EuropaBio, the European Association for Bioindustries, promotes an innovative and dynamic European biotechnology industry. EuropaBio and its members are committed to the socially responsible use of biotechnology to improve quality of life; to prevent, diagnose, treat, and cure diseases; to improve the quality and quantity of food and feedstuffs and to move towards a biobased and zero-waste economy. EuropaBio represents corporate and associate members, plus national biotechnology associations and bioregions.

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