

Passport checklist for detergents and end-user surfactants

Duties, passport content, deadlines and sources for detergents and end-user surfactants from 23 September 2029 - to tick off.

What this checklist covers

Nature of this checklist. This list follows the regulation text: the data points are law, not a forecast.

This checklist is part of our [reference on the digital product passport for chemicals](#), which covers REACH, CLP and the passport duties for the whole industry; this page narrows it down to detergents and end-user surfactants.

Regulation (EU) 2026/405 on detergents and surfactants replaces Regulation (EC) No 648/2004 and gives the sector the first hard passport duty in EU chemical law. This checklist sums up what it asks of you when you place a detergent or an end-user surfactant on the EU market: whom the duty catches, what the passport has to contain, how it has to be built, what goes into the EU registry, the deadlines as a timeline, and the official documents, linked under sources at the end. The whole list is also there to download as a PDF below.

The content is settled law. Annex VI Part A lists it item by item and applies directly from 23 September 2029, which is why this list is not a forecast. What is not settled is the technical layer around it: the implementing act under Article 21(10) that fixes the data carrier, its layout, the standards, the access rights and the update rights has not been adopted, and Annex VI itself may be amended by delegated act (Art. 30(1) and (2)). Build the data now and keep the format open.

The articles in brackets are those of the regulation.

Does the passport duty apply to your product?

Tick what holds for your product. The first two statements are the scope test, the rest catch companies that do not think of themselves as manufacturers. The articles in brackets point to [Regulation \(EU\) 2026/405](#).

- ☐ The product is a detergent: a substance, mixture or micro-organisms, or a combination of them, intended to clean, soak, rinse or bleach fabrics, dishes or surfaces, to modify the feel or odour of

fabrics, or to support the cleaning process alongside a laundry or dishwasher detergent (Art. 2(1)).

- ☐ Or it is an end-user surfactant, meaning a surfactant made available on the market to professional users or consumers (Art. 2(12)). A surfactant you sell to another formulator is not one and needs no passport.
- ☐ You place it on the EU market from 23 September 2029, as the manufacturer or as an importer or distributor selling it under your own name or trade mark (Art. 8(2), Art. 13(a)).
- ☐ You modify a product already on the market so that compliance could be affected, or you make a surfactant that is not an end-user surfactant available to end users: either turns you into the manufacturer in law (Art. 13(b) and (c)).
- ☐ It is an industrial or institutional detergent, placed on the market for use outside the domestic sphere by specialised personnel only (Art. 2(5)): it still needs a passport, but the ingredient list falls away where a REACH safety data sheet carries the equivalent information (Annex VI Part A).

Your duties

Everything [Regulation \(EU\) 2026/405](#) asks of whoever places a detergent or an end-user surfactant on the market, in the order you will meet it. Tick off what is already in place; every item names its article, and the deadlines below say when it applies.

- ☐ Draw up the technical documentation of Annex IV and carry out the conformity assessment procedure set out in that annex, before anything else happens (Art. 8(2)).
- ☐ Create the digital product passport for the model before placing the product on the market (Art. 8(2)(a), Art. 21(1)).
- ☐ Make the data carrier available: physically present on the label, the packaging or, for bulk, the accompanying documents, indelible, positioned to be read automatically, and present on the refill station where you sell by refill (Art. 21(4)).
- ☐ Put the statement "Please scan for more comprehensive information on the product", or a similar one, next to the carrier, and make it visible to the buyer before purchase, distance selling included (Art. 21(4)(e) and (f)).
- ☐ Enter a reference to the passport in the EU registry before placing the product on the market (Art. 8(2)(c), Art. 24(1)).
- ☐ Keep the passport accurate, complete and up to date, and available in the language or languages the member state of sale requires (Art. 21(2)(d) and (e)).
- ☐ Keep the technical documentation and the passport for ten years from the day the product was placed on the market (Art. 8(3)).

- ☐ Have a back-up copy of the passport held through a digital product passport service provider (Art. 21(12)(c)).
- ☐ Use a single data carrier and a single passport where other Union law asks for either, instead of a second code beside the first (Art. 21(5) and (6)).
- ☐ Give distributors and online marketplaces a digital copy of the data carrier or the unique product identifier, free of charge and within five working days of a request (Art. 21(12)(a) and (b)).
- ☐ Submit the ingredients data sheet to the bodies the member states appoint under Article 45 of the CLP Regulation, and update it when the formulation no longer matches it (Art. 8(6)). It stays confidential and is not the passport (Art. 16).
- ☐ Label the product with the information of Annex V Part A, plus the dosage information of Part B for consumer laundry, automatic dishwasher and surface detergents, in a language end users easily understand (Art. 17).
- ☐ Decide what may live on the digital label only and what has to stay physical: traceability element, manufacturer contact and product name stay on the pack (Art. 18(2)).

What the passport must contain

Annex VI Part A is the content list, and it is short enough to check against a formulation in an afternoon. It applies directly from 23 September 2029; the items that carry a condition say so, and Part B is the one wholly optional block. Under each item you find its place in the annex.

- ☐ Trade name, unique product identifier and a colour image of the packaging or the label clear enough to identify the model
Annex VI, Part A (a)
- ☐ Name, postal and electronic address and telephone number of the manufacturer and, where applicable, of the importer or authorised representative, with the manufacturer's unique operator identifier
Annex VI, Part A (b)
- ☐ The digital product passport service provider hosting the back-up copy
Annex VI, Part A (c)
- ☐ The identification of the product that allows traceability
Annex VI, Part A (d)
- ☐ A statement that the passport is issued under the sole responsibility of the manufacturer
Annex VI, Part A (e)
- ☐ The commodity codes under which the product is classified at the moment the passport is created, where applicable
Annex VI, Part A (f)

- ☐ A statement that compliance with the regulation has been demonstrated, with references to other Union law the product complies with
Annex VI, Part A (g)
- ☐ The full list of substances intentionally added, identified under Article 18(3) of the CLP Regulation, with carry-over preservatives where those have to be labelled
Annex VI, Part A (h)
- ☐ All intentionally added micro-organisms with their taxonomic classification, meaning genus, species and strain name or code
Annex VI, Part A (i)
- ☐ Optional, and worth carrying anyway: the label information of Article 17(3) and (4)
Annex VI, Part B

How the passport has to be built

The content is one half; the other half is a set of properties the passport has to have as a system. These are the ones you cannot retrofit cheaply, so they belong in the decision you make before you pick how to publish.

- ☐ One passport per model, a model being the units sharing manufacturer, trade name, content and manufacturing process and identified by a type number
Art. 21(2)(a), Art. 2(39)
- ☐ Batch or item level instead, where other Union law requires that granularity
Art. 21(7)
- ☐ Reached through a data carrier that connects to a persistent unique product identifier
Art. 21(2)(h)
- ☐ Free of charge for everyone entitled to read it, with no registration and no password for consumers and other end users
Art. 22(c) and (d)
- ☐ Based on open standards, machine-readable, structured, searchable and transferable without vendor lock-in
Art. 22(b)
- ☐ Fully interoperable with the passports other Union law requires
Art. 22(a)
- ☐ Stored by you or by a service provider that may not sell or reuse the data beyond the service
Art. 22(e) and (g)
- ☐ Linked to the earlier passports where a new one is created for a product that already has one
Art. 22(f)
- ☐ Free of reader tracking, and holding no personal data without explicit consent
Art. 22(h)

- ☐ Authentic, reliable and tamper-evident, designed and operated so that fraud is avoided
Art. 22(i) and (j)
- ☐ Following the identifier and data-carrier standards of the Ecodesign Regulation, including its rules on identifier lifecycle and on service providers
Art. 23

Registry and customs

The registry holds identifiers, not your formulations. It is the same central register the Ecodesign Regulation set up, which has been operating since 20 July 2026, and the entry is what customs check against.

- ☐ Upload the unique product identifier and the unique operator identifier before placing the product on the market
Art. 24(1)
- ☐ Expect the commodity code to be stored alongside them for products intended for release for free circulation
Art. 24(1)
- ☐ Keep the unique registration identifier the registry returns automatically, and do not read it as proof of compliance
Art. 24(2)
- ☐ Provide that identifier to customs at release for free circulation, where the check is electronic and automatic against the registry
Art. 25
- ☐ Keep your product data in the passport rather than in the registry, stored by you or by your service provider
Art. 22(e)

Deadlines

The dates that matter for a detergent or an end-user surfactant, taken from the application and transitional articles of the regulation. The last entry hangs on an implementing act the Commission has not adopted and is marked as such.

22 MARCH 2026

● The regulation enters into force

Regulation (EU) 2026/405 of 11 February 2026 enters into force on the twentieth day after its publication in the Official Journal of 2 March 2026 (Art. 37). Nothing is required of a product yet; what starts on this day is the five-year delegation of power to the Commission (Art. 31(2)).

1 OCTOBER 2028

● The digital labelling acts are due

By this date the Commission adopts delegated acts determining the specific requirements for digital labelling of detergents, including which types of IT solutions you may use (Art. 30(10)). They matter for the passport because the digital label rides on the same data carrier (Art. 19(1)(d)).

23 SEPTEMBER 2029

● The regulation applies and the passport is due

From this day the manufacturer creates a digital product passport for every detergent and end-user surfactant before placing it on the market, makes the data carrier available and enters a reference in the EU registry (Art. 8(2), Art. 37). Regulation (EC) No 648/2004 is repealed with effect from the same day (Art. 35).

Customs check the registration

Customs release a product for free circulation only after verifying that the unique registration identifier and the commodity code match the registry. The check runs electronically from this day or from the day the registry is connected to the customs single window, whichever is later (Art. 25).

23 SEPTEMBER 2030

● The transition window closes

Products placed on the market before 23 September 2029 in compliance with Regulation (EC) No 648/2004 may be made available indefinitely. Products placed in the twelve months after it under the old rules may be made available only until this day (Art. 36).

23 MARCH 2032

● Biodegradability of films

Films, and the polymers within films, must comply with the biodegradability requirements of Annex I Part B (Art. 4(3)). One of the two provisions that are carved out of the 2029 application date.

23 MARCH 2034

Biodegradability of other organic substances

Organic substances intentionally added at 10 % w/w or more of the total mass of substances excluding water, other than surfactants, films and polymers within films, must meet the criteria of Annex I Part C, unless Part D grants a derogation (Art. 4(4)).

TEN YEARS AFTER
PLACING ON THE
MARKET

How long the passport lives

The passport stays available for ten years after the product was placed on the market, including in cases of insolvency, liquidation or the operator ceasing activity in the Union (Art. 21(2)(g)). The manufacturer keeps the technical documentation and the passport for the same period (Art. 8(3)).

AFTER THE ACT

The technical requirements

The data carrier, its layout and positioning, the standards to be used, who may read which field and who may create or update one all come from an implementing act under Art. 21(10). It has not been adopted, and its date of application must be at least eighteen months after it enters into force.

Sources

The documents this checklist is drawn from, and what each one is good for.

Document	What for
Regulation (EU) 2026/405	The regulation itself: Art. 8 on the manufacturer's duties, Art. 21 and 22 on the passport, Art. 23 on identifiers, Art. 24 on the registry, Annex VI on the content.
Regulation (EC) No 648/2004	The regulation being replaced, and still the measure for anything placed on the market before 23 September 2029.
Regulation (EU) 2024/1781 (ESPR)	The framework whose registry, identifier standards and service-provider rules the detergent passport adopts wholesale.
Implementing Regulation (EU) 2026/1778	How the central registry works: identity verification, granularity, versioning and retention.
Regulation (EC) No 1907/2006 (REACH)	Article 31 on the safety data sheet, which stands in for the passport ingredient list for industrial and institutional detergents.

Document	What for
Regulation (EC) No 1272/2008 (CLP)	Article 18(3) on how a substance is named in the ingredient list, Article 45 on the bodies that receive the ingredients data sheet.
Chemicals page of the European Commission	The Commission's overview of the sector, where new guidance and the pending acts appear first.

How to prepare

Six steps in the order they pay off, from sorting your range to the first published passport.

1. **Split your range first:** decide per product whether it is a detergent, an end-user surfactant or a surfactant sold on to another formulator. Only the first two need a passport, and the line runs through your customer list rather than through your formulations.
2. **Pull the ingredient list forward:** Annex VI point (h) wants every intentionally added substance named the CLP way. The list exists in your formulation system already; getting it out as structured data rather than as a PDF is the actual work.
3. **Settle the industrial and institutional question:** where a REACH safety data sheet carries the equivalent information, the passport ingredient list falls away. Record the reasoning per product, because market surveillance will ask which route you took.
4. **Plan one carrier, not three:** the digital label and the passport share the same data carrier, and other Union law has to fit on it too. Decide once where the code sits on the pack and on the refill station.
5. **Pilot with a handful of formulations:** [Register for free](#), start from the chemicals import template and build a few real products as passports. Fields that do not apply to a product stay empty without blocking the passport.
6. **Prepare the registry entry, do not automate it:** hold the unique product identifier, the operator identifier and the passport address ready. The upload is yours to make as the operator placing the product on the market; Transpareo prepares what the entry asks for.

As of 8 September 2026. The current version of this checklist:

<https://transpareo.com/en/industries/chemicals/checklist-detergents>