European Commission

EU Ecolabel criteria for rinse-off cosmetic products

1st Ad-hoc Working Group Meeting
27th November 2019, Brussels

Joint Research Centre
the European Commission's in-house science service

JRC Science Hub: ***ec.europa.eu/jrc***

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Agenda

- Political objectives of the EU Ecolabel and process description
- Summary of the preliminary report : Focus on revised scope
- Criterion 1. Toxicity to aquatic organisms: Critical Dilution Volume (CDV)
- Criterion 2. Biodegradability
- Criterion 3. Excluded or limited substances and mixtures
- Criterion 4. Packaging
- Criterion 5. Renewable ingredients
- Criterion 6. Fitness for use
- Criterion 7. Information on the EU Ecolabel
- Conclusion, next steps and closure of the workshop

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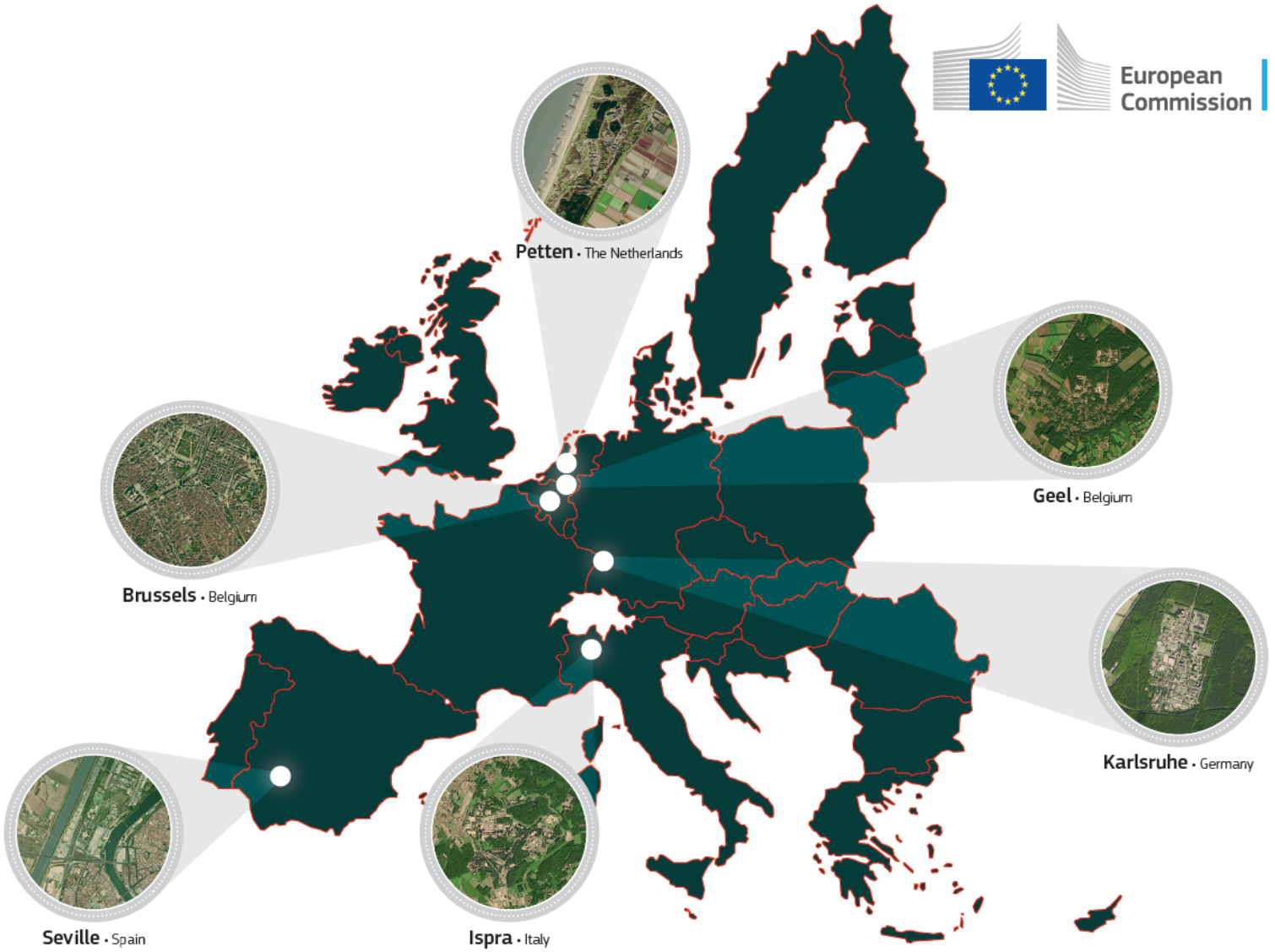
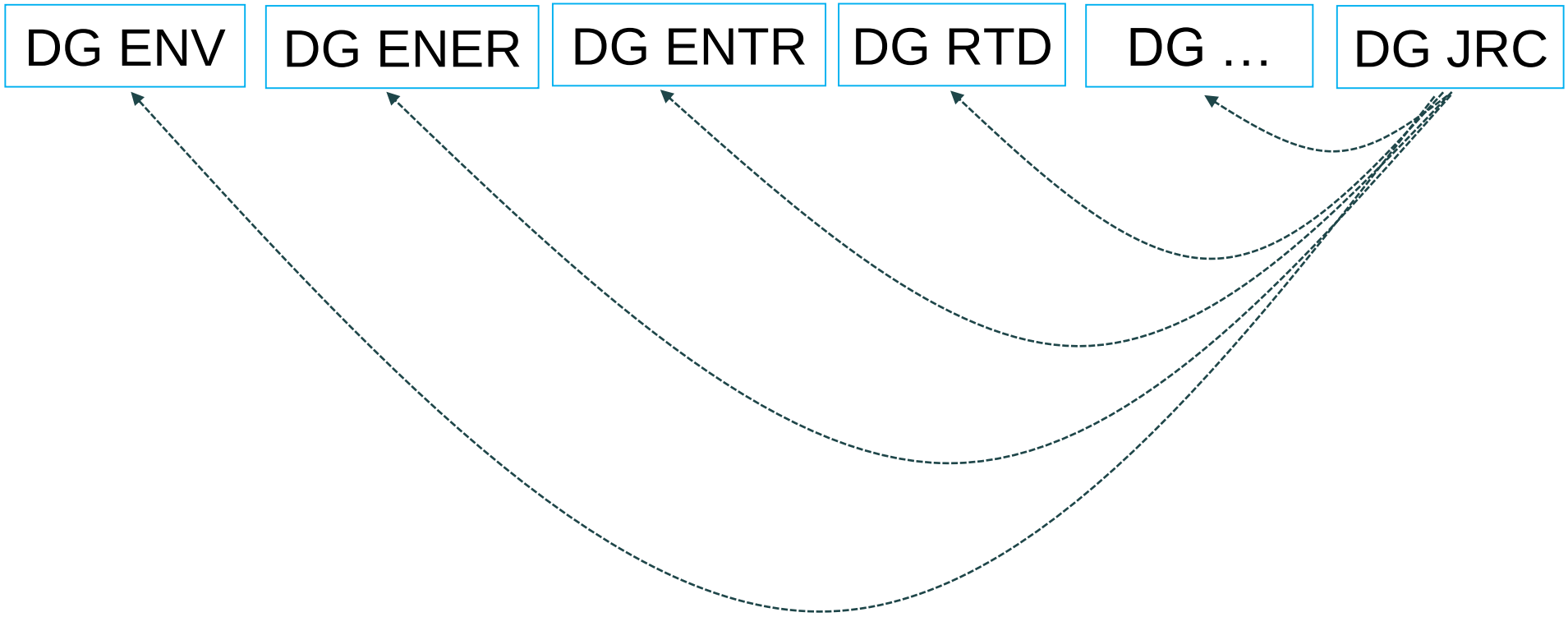
Political objectives & Process description



Political objectives & Process description

Joint Research Centre in the context of the European Commission:



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Activities in support of Product Policy

- JRC B5 Product Bureau supports the **development and implementation of Sustainable Product Policies**, among them the EU Ecolabel Regulation and the Green Public Procurement Communication.

- **Analysis of product groups** with focus on techno-economic and environmental aspects.

- **Develop criteria** and implementing measures until the stage of voting in committee (resp. publication on GPP page).

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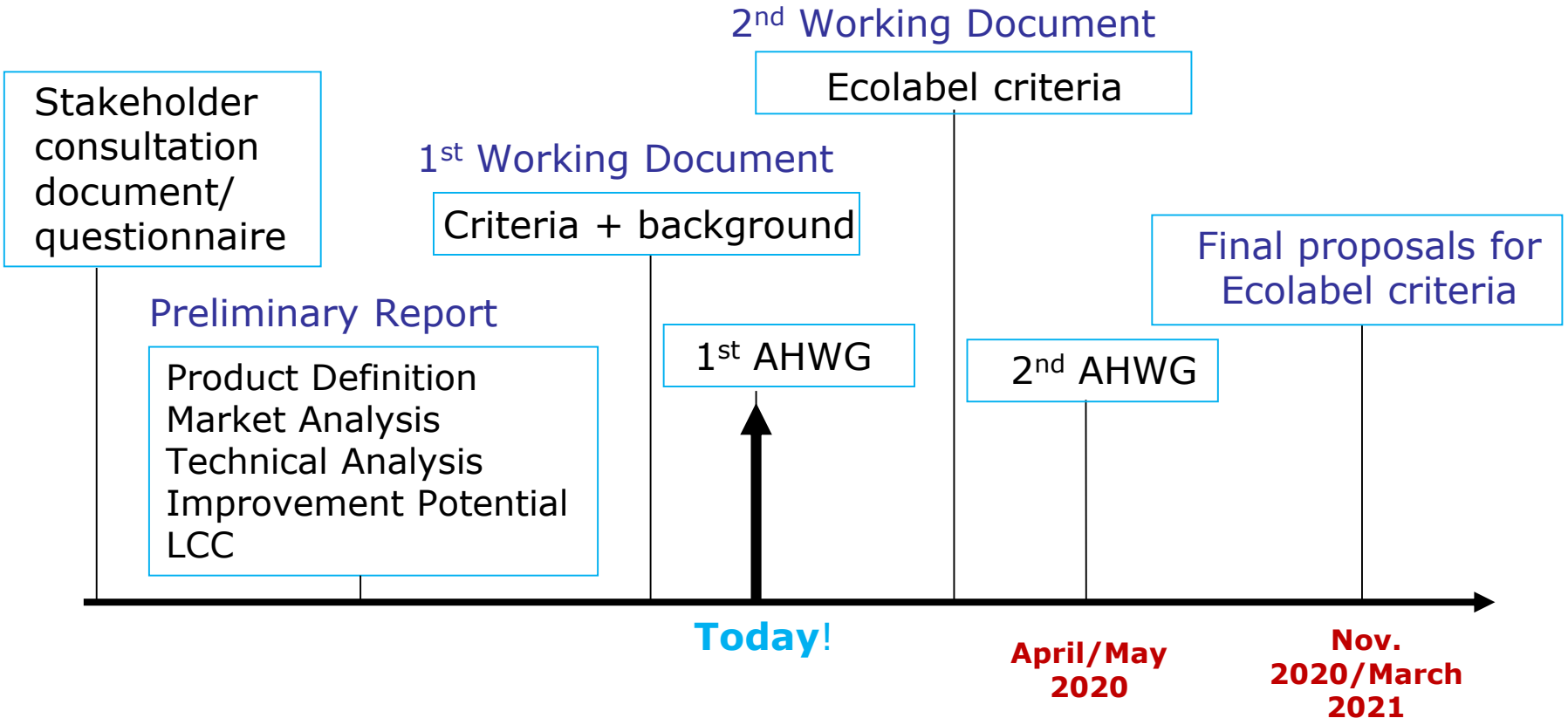
Criteria development process



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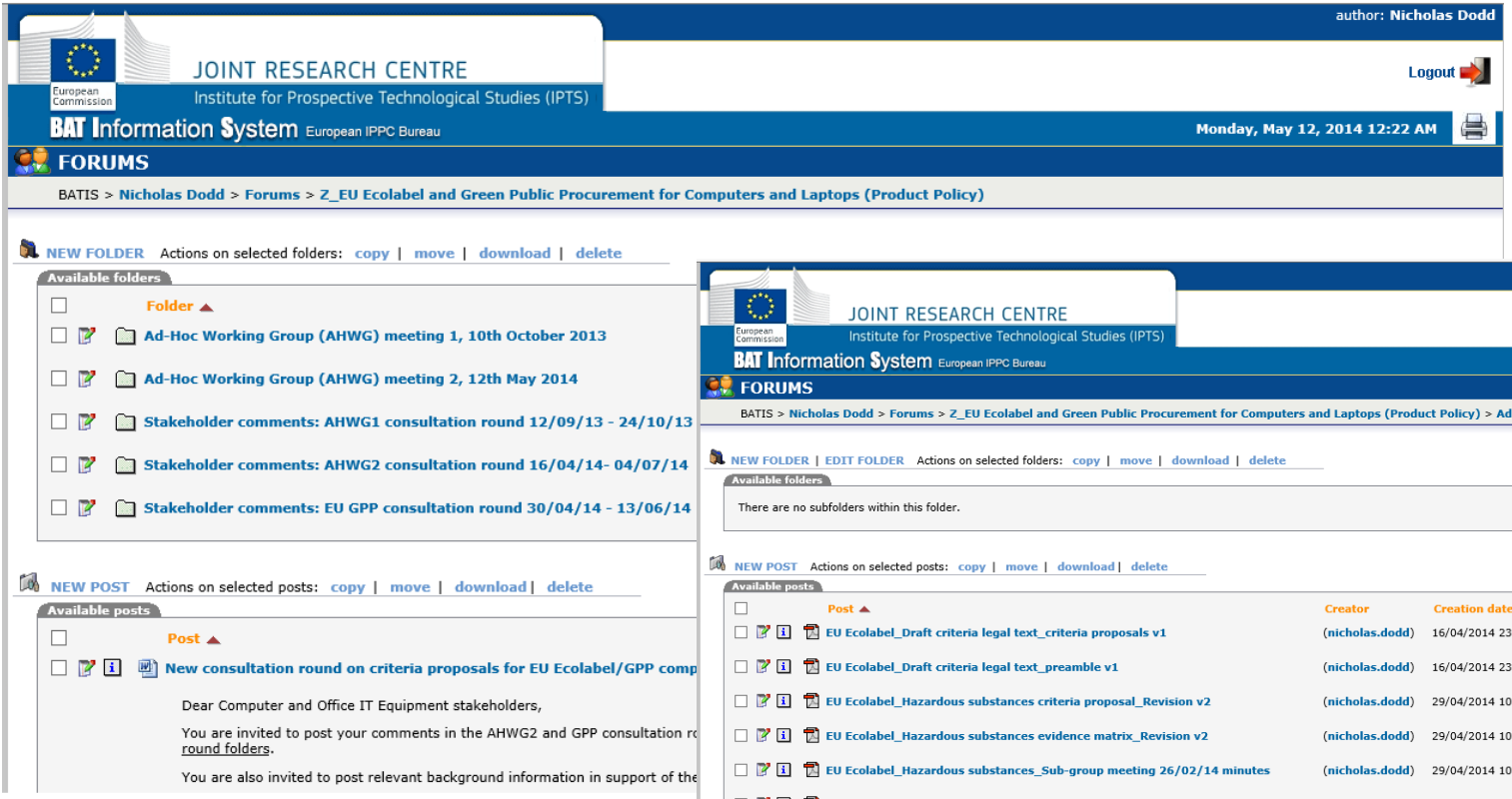
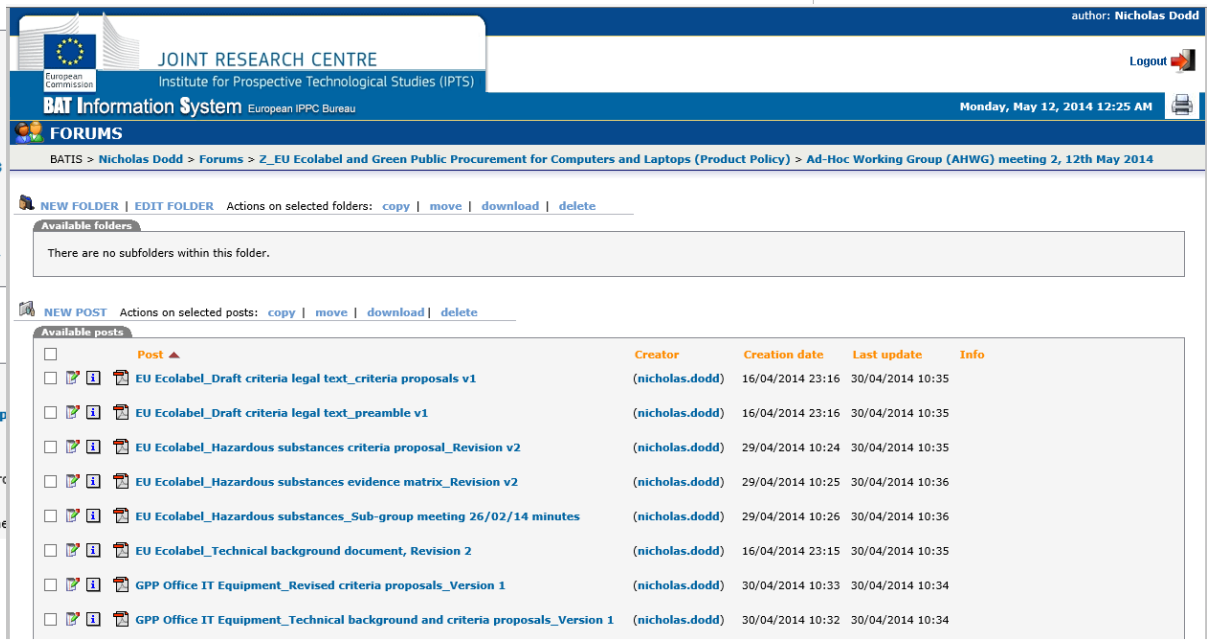
Using the BATIS system





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Next steps:

1. Stakeholders can provide **comments** on technical report and criteria proposals **not later than by 3rd January 2020**

2. Comments need to be submitted using the BATIS system.

3. March/April 2020: TR2.0 publication

4. April/May 2020: 2nd AHWG meeting

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Summary of the preliminary report : Focus on revised scope

Existing product group name
Rinse-off cosmetic products
Existing product group scope and definition:
The product group 'Rinse-off cosmetic products' shall comprise any rinse-off substance or mixture falling under the scope of Regulation (EC) No 1223/2009 of the European Parliament and of the Council(*) intended to be placed in contact with the epidermis and/or the hair system with a view exclusively or mainly to cleaning them (toilet soaps, shower preparations, shampoos), to improve the condition of the hair (hair conditioning products) or to protect the epidermis and lubricate the hair before shaving (shaving products). *The product group 'Rinse-off cosmetic products' shall include products for both private and professional use.* *The product group shall not cover products that are specifically marketed for disinfecting or anti-bacterial use. Anti-dandruff shampoos are allowed.* *[References: (*) Regulation (EC) No 1223/2009 of the European Parliament and of the Council of 30 November 2009 on cosmetic products (OJ L 342, 22.12.2009, p. 59).]*

Summary of the preliminary report : Focus on revised scope

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Current scope

Commission Decision (2014/893/EU) of 9 December 2014

Scope (Article 1)

Any rinse-off substance or mixture falling under the scope of **Regulation (EC) No 1223/2009** intended to be placed in contact with the epidermis and/or the hair system with a view exclusively or mainly to:

- clean them (toilet soaps, shower preparations, shampoos)

- improve the condition of the hair (hair conditioning products)
- protect the epidermis and lubricate the hair before shaving (shaving products)

General interest to expand scope in this revision

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Revised scope proposal: Product categorisation

The cosmetic group is a **heterogeneous product group** and there is **no standard classification**.

PRODCOM Data → 19 product categories under the "Manufacture of soap and detergents, cleaning and polishing preparations, perfumes and toilet preparations" category.

MINTEL Data → 10 relevant categories used in their classification for beauty & personal care products, and health & hygiene products.

Cosmetic Europe categorisation → cosmetics and personal care products divided in 7 categories.

Revised scope proposal: Product categorisation

Proposal for a **harmonised list of categories** to be used in this revision:

SHOWER, BATH and OTHER BODY CLEANSER PREPARATIONS	**Bar soaps**	Products intended to be placed in contact with the epidermis and/or the hair system with a view exclusively or mainly to cleaning them.
	Liquid soaps	
	Shampoos	
	Feminine hygiene products	
HAIR STYLING AND TREATMENT (Including rinse-off and not rinse-off)	**Conditioners**	Products to improve the condition of the hair
	Hair colorants	Hair preparation with colorants and dyes
	Hair treatment	Preparations for permanent waving or straightening of hair
	Hair styling	Hair modelling waxes, sprays, mousses and lacquers
SKIN CARE	Rinse-off	Exfoliants
	Leave on	Creams, oils and lotions for the skin care, including aftersun and self-tanning creams, make-up cleansers and sunscreen
SHAVING PREPARATIONS		Shaving foams and gels
MOUTHWASH		Mouth washes and oral perfumes
TOOTHPASTE		Dentifrices
DEPILATORY PRODUCTS	Rinse-off	Depilatory creams and foams
	Leave on	Depilatory waxes and not rinse-off depilatory creams and foams
DEODORANTS AND ANTIPERSPIRANTS		Personal deodorants and anti-perspirants
PERFUMES		Perfumes, toilet waters & eau de cologne
PERFUMED BATH SALTS AND OTHER BATH PREPARATIONS	Bath salts	Perfumed bath salts
	Other bath preparations without cleaning function	Bath oils and other bath preparations without cleaning function
DECORATIVE COSMETICS		All beauty and make-up cosmetics: body colour cosmetics, eye colour cosmetics, face colour cosmetics, lip colour cosmetics, multiuse colour cosmetics, nail colour cosmetics
NAIL ENAMEL REMOVER		Products intended to remove nail colour cosmetics
HAND SANITIZERS		Products intended to reduce the infectious agents on the hands
ANIMAL CARE PRODUCTS	Shampoos and conditioners	Rinse-off products for animal care products
	Other preparations	Perfumes and dry shampoos
INTIMATE GELS/LUBRICANTS PRODUCTS		Intimate products with formulations similar to products covered by the Cosmetics Regulation such as lubricants, anal creams and orgasm gels.

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Revised scope proposal: Methodology and relevant aspects for product inclusion

The selection of product categories to be included in the scope has been done considering different relevant aspects:

1. Risk of release into the water
2. Interest from stakeholders
3. Harmonisation with other labels
4. Similarity with current included formulations
5. Products with higher market relevance
6. Consume patterns

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Revised scope proposal: Methodology and relevant aspects for product inclusion

1. Risk of release into the water

- Release to water → one of the life stages with major environmental impact.
- The potential release to the environment → principal reason behind the formulation of the existing EU Ecolabel scope.
- There are **still some products which are not covered**, but can have an important impact to the environment, as they are also directly released to water.

Products are ranked in three levels of risk:

- **High risk** → products intended to be removed with water shortly time after use or intended to be used in sensitive environments.
- **Medium risk** → products that are not intended to be removed with water in a normal use, but residual parts of the product may end up in water.
- Products that in normal use are not released to water are classified as **low risk**

Revised scope proposal: Methodology and relevant aspects for product inclusion

1.Risk of release into the water

Cosmetic product		Potential risk
Shower, bath and other body cleanser preparations	Bar Soaps	High
	Liquid Soaps	
	Shampoos	
	Feminine Hygiene Products	
Hair styling and treatment (including rinse-off and not rinse-off)	Conditioners	High
	Hair Colorants	High/ Medium
	Hair Treatment	
	Hair Styling	
Skin care	Rinse-off	High
	Leave on	Medium
Shaving preparations		High
Mouthwash		High
Toothpaste		High
Depilatory products	Rinse-off	High
	Leave on	Medium
Deodorants and antiperspirants		Low
Perfumes		Low
Perfumed bath salts and other bath preparations	Bath salts	High
	Other bath preparations without cleaning function	
Decorative cosmetics		Low
Nail enamel remover		Low
Hand sanitizers		Low
Animal care products	Shampoos and conditioners	High
	Other preparations	Low
Intimate gels/lubricants		Low

Assessment/scoring:

- High risk of release into water -**2 points**
- Medium risk of release into water – **1 point**
- Low risk of release into water - **excluded**

"**low risk** of release into water" are proposed to be **excluded from the scope** extension without further assessment

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Revised scope proposal: Methodology and relevant aspects for product inclusion

2. Stakeholder's interest in the inclusion of specific products

Explored via 2 questionnaires

Assessment/scoring:

- More than 60% of stakeholders interested in the inclusion – **2 points**
- Between 40-60% of stakeholders are interested in the inclusion - **1 point**
- Less than 40% of stakeholders are interested in the inclusion - **0 points**

Revised scope proposal: Methodology and relevant aspects for product inclusion

3. Level of harmonisation with other labels and environmental schemes

Bar soaps	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Liquid soaps	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Shampoos	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Feminine hygiene products		✓			✓	✓	✓	✓	✓		✓	✓	✓	✓
Conditioners	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Hair styling & Hair treatment		✓			✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Exfoliants		✓			✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Sunscreen		✓			✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Skin care- Non rinse-off	✓	✓			✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Shaving preparations		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Mouthwash	✓	✓			✓	✓	✓	✓	✓	✓	✓	✓	✓	
Toothpaste	✓	✓			✓	✓	✓	✓	✓	✓	✓	✓	✓	
Depilatory products		✓			✓	✓	✓	✓	✓		✓	✓	✓	
Deodorants and antiperspirants		✓			✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Perfumes		✓			✓	✓	✓	✓	✓	✓	✓	✓	✓	
Perfumed bath salts and other bath preparations		✓			✓	✓	✓	✓	✓		✓	✓	✓	
Decorative cosmetics		✓			✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Nail enamel remover		✓			✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Hand Sanitizers										✓	✓			
Animal care products		✓									✓			
Sex products		✓									✓			

Assessment /scoring:

- More than 75% of the schemes include the product group – **2 points**
- Between 25 - 75% of the schemes include the product group - **1 point**
- Less than 25% of the schemes include the product group - **0 points**

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Revised scope proposal: Methodology and relevant aspects for product inclusion

4. Similar composition to products included in the existing scope

Assessment/scoring:

- High similarity – **2 points**
- Medium similarity – **1 point**
- Low similarity – **0 points**

Revised scope proposal: Methodology and relevant aspects for product inclusion

4. Similar composition to products included in the existing scope

Review of the main type of ingredients present in the formulation of the product.

CATEGORIES	TYPE OF INGREDIENTS																																		
	Soap	Humectants	Emulsifying	Emollients	Thickeners	Anionic surfactants	Nonionic surfactants	Amphoteric surfactants	Cationic Surfactants	Parfum	Colorants	Preservatives	Antioxidants	Chelating agents	UV filters	Pearlescent agents	Opacifying	Conditioning agents	Propellants	Plasticisers	Solvents	Reducing agents	Oxidising agent	Alkaline agents	Straightening agents	Bulking agents	Exfoliating agents	Anticaking agents	Abrasives	Oral care-protecting agents	Oral care-antiplaque	Oral care-sweetening agents	Oral care-deodorant	Flavour	Antiperspirant	Deodorant
Shower, bath and other body cleanser preparations	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■			■															
Hair styling & treatment		■	■	■	■	■	■	■	■	■	■	■	■	■	■			■	■	■	■	■	■	■	■											
Skin care		■	■	■	■					■	■	■	■		■			■			■					■	■									
Shaving preparations	■	■	■	■	■	■	■	■		■	■	■	■	■			■	■			■															
Mouthwash		■			■	■	■	■			■	■																				■	■	■		
Toothpaste					■	■						■		■							■								■	■	■	■	■			
Depilatory Products		■	■	■	■	■	■	■		■	■		■	■			■	■				■		■												
Deodorants & antiperspirants	■	■	■	■	■					■		■		■					■		■					■									■	■
Perfumes										■																										
Perfumed bath salts and other bath preparations			■	■		■	■	■		■	■	■			■											■										
Decorative cosmetics		■	■	■	■	■	■	■		■	■	■	■	■	■	■	■	■		■	■					■		■							
Nail enamel removers		■	■							■	■		■					■			■						■									
Hand sanitizers		■	■		■					■	■	■	■	■	■			■			■														
Animal care products	■	■	■		■	■	■	■		■	■	■	■	■				■																		
Intimate lubricants		■	■	■	■							■	■	■				■			■													■		

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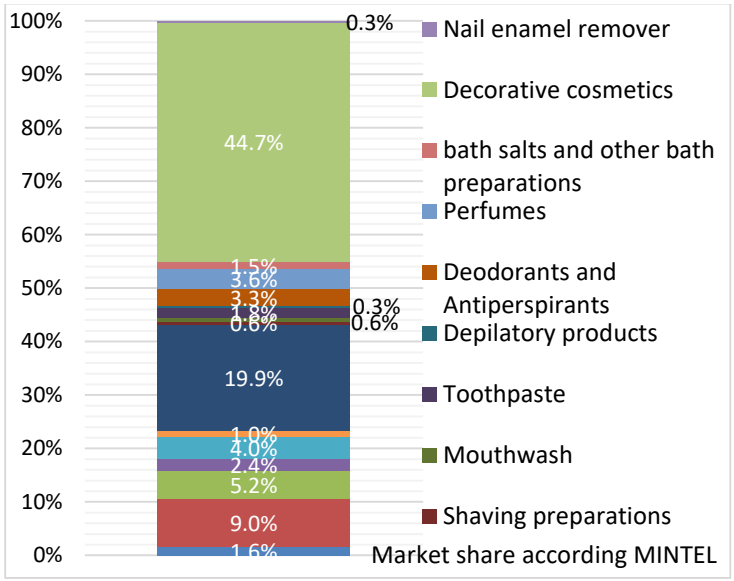
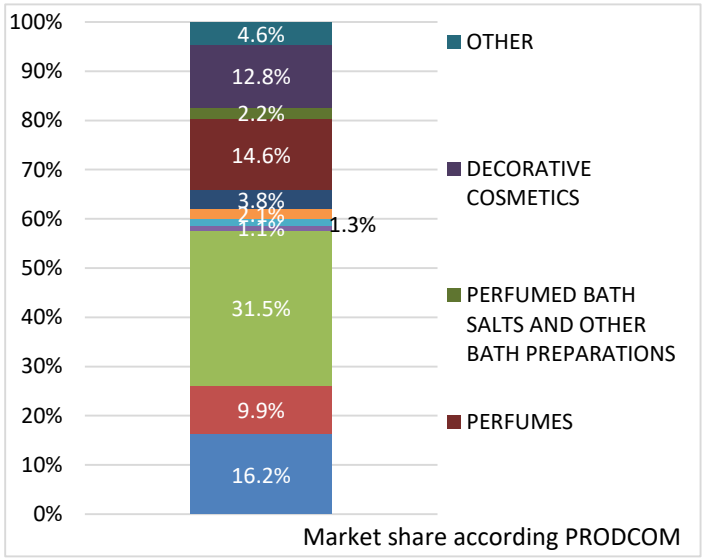
Revised scope proposal: Methodology and relevant aspects for product inclusion

5. Market share of the products



	MINTEL (NPD from 2015 to 2018)	PRODCOM (production in euros for 2017)
SHOWER, BATH and OTHER BODY CLEANSER PREPARATIONS	15,8	16,2
HAIR STYLING AND TREATMENT	6,4	9,3
SKIN CARE	20,9	31,5
SHAVING PREPARATIONS	0,6	1,1
MOUTHWASH	0,6	1,3
TOOTHPASTE	1,8	2,1
DEPILATORY PRODUCTS	0,3	-
DEODORANTS AND ANTIPERSPIRANTS	3,3	3,8
PERFUMES	3,6	14,6
PERFUMED BATH SALTS AND OTHER BATH PREPARATIONS	1,5	2,2
DECORATIVE COSMETICS	44,7	12,8
NAIL ENAMEL REMOVER	0,3	-
OTHER	-	4,6



Assessment/scoring:

- More than 10% of the market share – **2 points**
- Between 3- 10% of the market share – **1 point**
- Less than 3% of the market share – **0 points**

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Revised scope proposal: Methodology and relevant aspects for product inclusion

6. Consumption patterns and frequency of product application

Product category	Frequency of application[1]	Estimated daily amount applied (g)[2]
Bar soaps	10/day (hand wash soap)	20,00 (hand wash soap)
Liquid soaps	1,43/day (shower gel)	18,67 (shower gel)
Shampoos	1/day	10,46
Conditioners	0,28/day	3,92
Hair Styling & Hair Treatment	1,14/day	4,00
Sunscreen	2/day	18
Skin care- Not rinse-off	2,28/day (body lotion)	7,82 (body lotion)
Shaving preparations	1/day	No info
Mouthwash	No info	21,62
Toothpaste	1,5/day*	2,75
Deodorants and antiperspirants	2/day	1,50 (non-spray) 1,43 (aerosol) 0,69 (spray)
Perfumes	1/day	No info
Perfumed bath salts and other bath preparations	1/day	No info
Decorative cosmetics	1 or 2/day	0,62

Assessment/scoring:

- More than 1 time per day – **2 points**
- 1 time per day – **1 point**
- Less than 1 time per day – **0 points**

[1] Ficheux AS et al. (2015): Consumption of cosmetic products by the French population. First part: Frequency data, Food and Chemical Toxicology, 78, pp 159-169. Journal article available at: http://www.researchgate.net/publication/272199849

[2] Sum of liquid foundation (0,51g), eye shadow (0,02g), mascara (0,025g), eyeliner (0,005g) and lipstick/lip salve (0,057g)

Revised scope proposal: Methodology and relevant aspects for product inclusion

Final scoring

Once the classification is completed, a total punctuation from 0 to 12 could be obtained.

The potential for inclusion of the products have been done considering the following scale:

Punctuation	0-3	4-6	7-12
Potential for inclusion	Low	Medium	High

Revised scope proposal: Methodology and relevant aspects for product inclusion

Final scoring

PRODUCT CATEGORY		Risk to release into water	Interest of stakeholders	Level of harmonisation	Ingredient similarity	Market relevance	Daily use	Potential for inclusion
SHOWER, BATH and OTHER BODY CLEANSER PREPARATIONS	Feminine Hygiene Products					-	-	High
HAIR STYLING AND TREATMENT (Including rinse-off and non rinse-off)	Hair Colorants		-					Medium
	Hair Treatment		-					
	Hair Styling		-					
SKIN CARE	Rinse-off							High
	Non rinse-off							High
MOUTHWASH							-	Medium
TOOTHPASTE								High
DEPILATORY PRODUCTS	Rinse-off						-	Low
	Non rinse-off						-	Low
PERFUMED BATH SALTS AND OTHER BATH PREPARATIONS	Bath salts		-					Medium
	Other bath preparations without cleaning function		-					
ANIMAL CARE PRODUCTS	Shampoos and conditioners					-	-	Medium

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Revised scope proposal: Methodology and relevant aspects for product inclusion

Final scoring (excluded)

"**low risk** of release into water" are proposed to be excluded from the scope

PRODUCT CATEGORY		Risk to release into water	Interest of stakeholders	Level of harmonisation	Ingredient similarity	Market relevance	Daily use	Potential for inclusion
DEODORANTS AND ANTIPERSPIRANTS								
PERFUMES								
DECORATIVE COSMETICS			-					
NAIL ENAMEL REMOVER							-	
HAND SANITIZERS						-	-	
ANIMAL CARE PRODUCTS	Other preparations					-	-	
INTIMATE GELS/LUBRICANTS			-			-	-	

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Revised scope proposal: Methodology and relevant aspects for product inclusion

Conclusions

Included

- **Existing** covered categories (soaps, shampoos, hair conditioning products, shaving products)
- **Final scoring HIGH** (feminine hygiene products, toothpastes, skin care products)
- **Final scoring MEDIUM** (animal products)

Excluded

- "**Low risk of release into environment**"
- **Final scoring LOW** (depilatory products)
- **Final scoring MEDIUM** (mouthwash, hair styling and treatment, perfumed bath salts and other bath preparations)

Summary of the preliminary report : Focus on revised scope

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Revised scope proposal: scope and definitions text proposal

First product group scope and definition proposal:

The product group 'Cosmetic products' shall comprise any substance or mixture intended to be placed in contact with the epidermis, mouth, and/or the hair system with a view exclusively or mainly to cleaning them (soaps, shampoos, shower preparations, feminine hygiene cosmetic products and toothpastes), to improve the condition of the hair (hair conditioning products), to take care of the epidermis (skin care products), to protect the epidermis or lubricate the hair before shaving (shaving products) and to be placed in contact with animal hair to clean them or to improve the condition of it (animal care products).

The products intended to be used for humans shall fall under the scope of Regulation (EC) No 1223/2009 of the European Parliament and of the Council.

The product group 'Cosmetic products' shall include products for both private and professional use.

The product group shall not cover products that are specifically marketed for disinfecting or anti-bacterial use. Anti-dandruff shampoos are allowed.

Feminine hygiene cosmetic products include rinse-off products intended to wash feminine intimate parts, such as intimate cleansers.

Skin care products includes creams, oils and lotions intended to be in contact with the epidermis, including aftersuns and self-tanning creams, make-up cleansers, exfoliants and sunscreens.

Animal care products include rinse-off products intended to be in contact with animal hair to clean them or to improve the condition of it, such as shampoos and conditioners for animals.

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Market analysis

- Cosmetic sector is important worldwide and European market is the largest in the world, being the first cosmetic exporter. The so-called "Big 5" lead the European cosmetic market in terms of production, exports, imports and consumption.

- Skin care is the category with largest share of European market in terms of retail sales. The inclusion of **skin care products in the scope could suppose an important increase of number of products awarded with EU Ecolabel**.

- In a very competitive market, companies look for different strategies to stand out and new niches to work. Specialized and personalized products are requested by customers, as well innovative products, requiring research and development of new cosmetic products.

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Market analysis

- New targets of cosmetic consumers are growing such as Millennials, Generation Z, men or older people. Specific products for these consumers. New generations are more conscious about environmental problems, being an important target for EU Ecolabel products.

- Private label products have recently won followers thanks to quality improvement and good prices. As well, these **firms have positioned with eco-claims** (natural, vegan, organic, etc.) in their products.

- Analysis of claims, clearly indicates a **growing demand of eco-friendly products**.

- Consumers are also aware about plastic reduction, and recycled or bio-based packaging is a plus.

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Technical analysis

Life cycle assessment

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Technical analysis

Impact of the raw material extraction phase

- **Sustainable source of ingredients.** The use of vegetable raw materials has been increased over the years; the sustainability of these raw materials should be certified.

•The Roundtable on Sustainable Palm Oil (RSPO) certification was created to ensure the credibility of palm oil sustainability claims.

•Especial relevance for leave on products→ skincare products.

Previous revision→ 44% of the total environmental impact in case of solid soaps, to 23% for hair conditioners, to 9% for shampoo and to 10% for liquid soaps.

- Solid soaps → the amount of water in the formulation is quite low.
- Hair conditioners → silicones or waxes.

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Technical analysis

Production or manufacturing

→13% of the total environmental impact of a cosmetic product.

Energy consumption, water consumption and waste water treatment, and waste generated during the production.

Packaging

- Packaging innovation is playing a key role in influencing purchasing decisions. Consumers are willing to pay more for products with environmentally friendly packaging.
- Existing EU Ecolabel criteria: reducing the weight of the packaging or using recyclable materials and components.

Previous revision→ 17 to 24%, depending on the product category evaluated.

Transport or distribution (→lower than 10%)

- Life cycle stage with lower environmental contribution to the total impact
- Cosmetic sector is developing practices to reduce the emissions associated with the transport.

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Technical analysis

Use

- The use phase of rinse-off products has an important environmental impact. However, it is difficult to reduce the environmental impact of this life cycle stage because it **depends on the consumer behaviour and decision.**

- Around **90% of the total CO_2 emissions across the product life cycle of shampoo stems from the heating and use of tap water.**

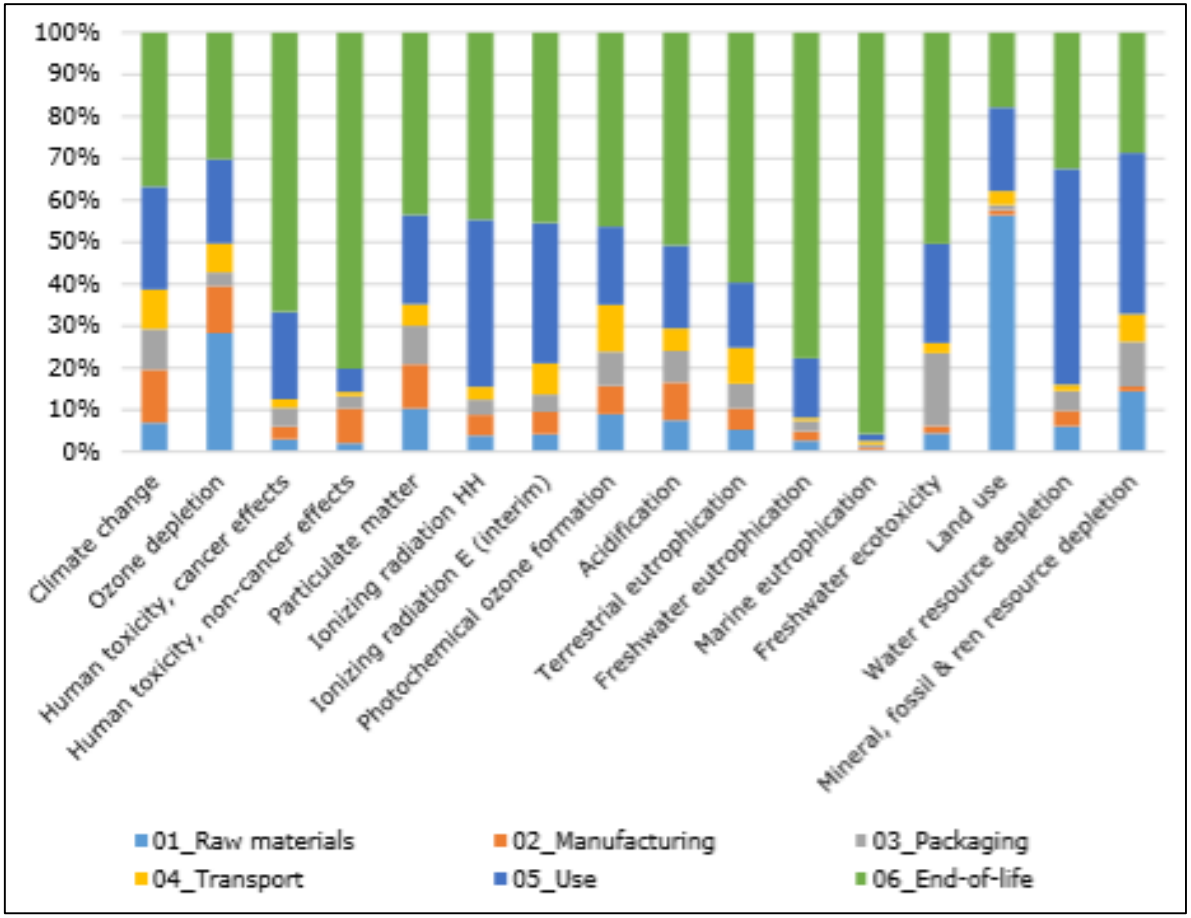
End-of-life

- The product that ends-up in water generates an environmental impact due to the **harmful substances included in the formulation.**
- Restriction on the toxicity to aquatic organisms and on the minimum biodegradability of the product ingredients is included in existing EU Ecolabel criteria in order to reduce the environmental impact of this life cycle stage.
- Generation of wastewater after use and the treatments of this wastewater →14 and 20% of the total environmental impact

Technical analysis

LCA has been actualized considering the **new version of the Simapro software and the Ecoinvent database**. On the other hand, three new products have been analysed: toothpaste, leave-on skin care products and sun care products.

Liquid soap



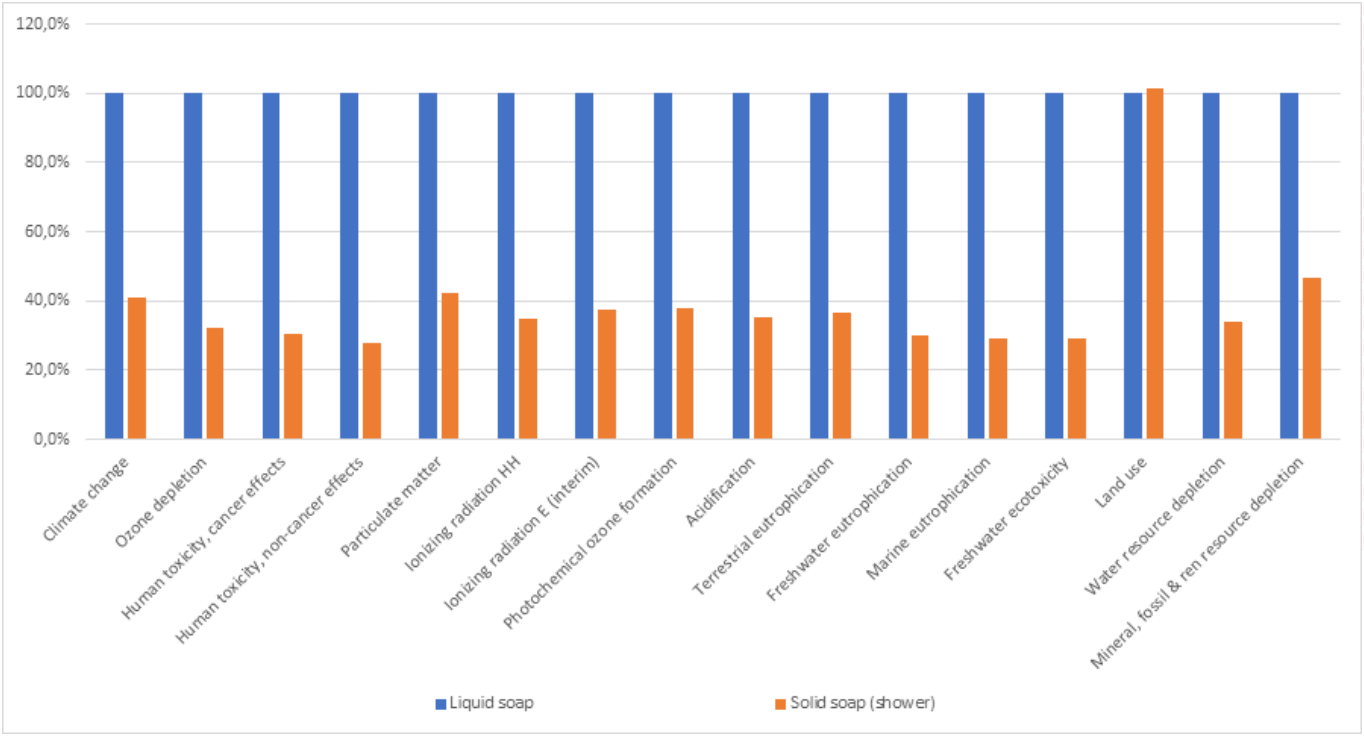
- End-of-life →stage with higher contribution for most of the impact categories analysed
- Use stage contributes generally more than the extraction of raw materials.
- Packaging, manufacturing and transport phases contribute to a minor extent to the environmental impacts.

similar to the distribution for shampoos and hair conditioners and solid soap (if used only for hand washing)

European Commission

Technical analysis

Liquid soap vs Solid soap



→ considering a **shower application**.

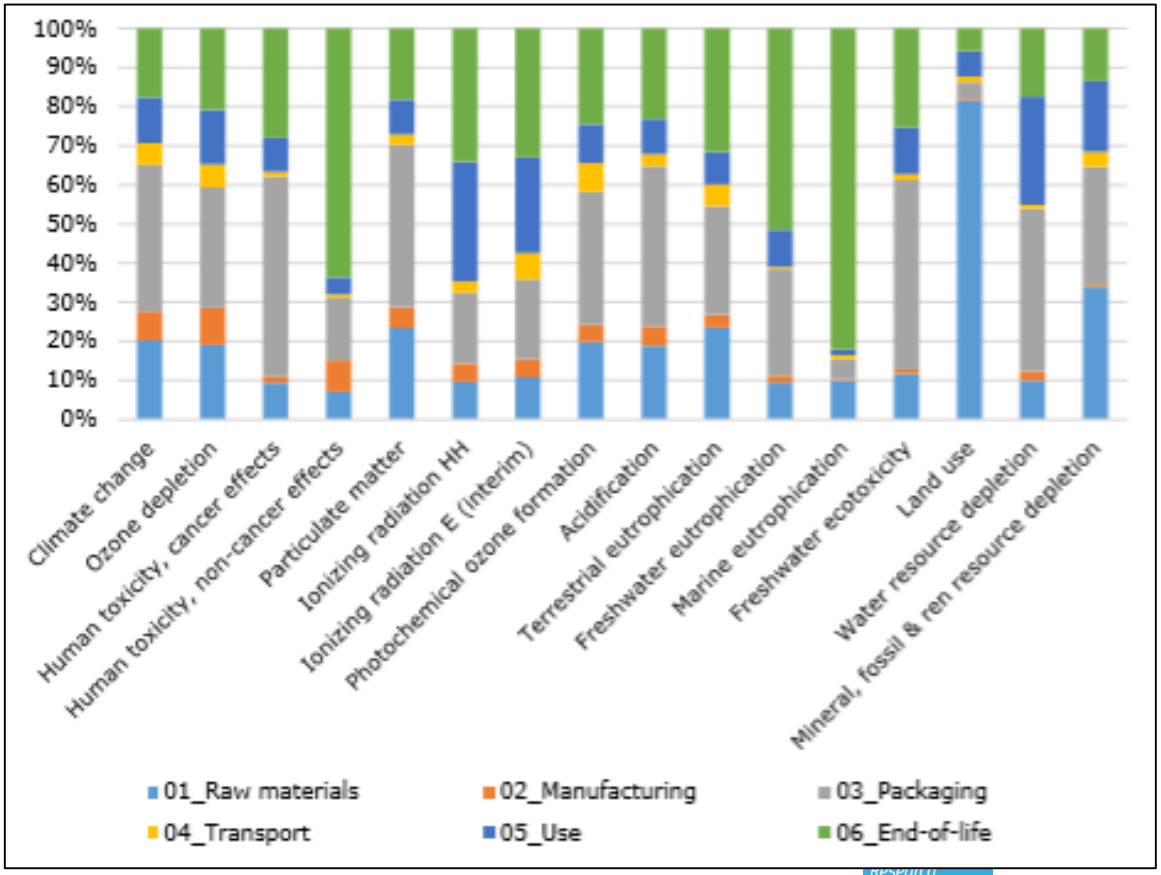
→ For all the categories (except for the land use category) **the environmental contribution for solid soap is lower than for the liquid soap.**

Joint Research Centre

European Commission

Technical analysis

Toothpaste

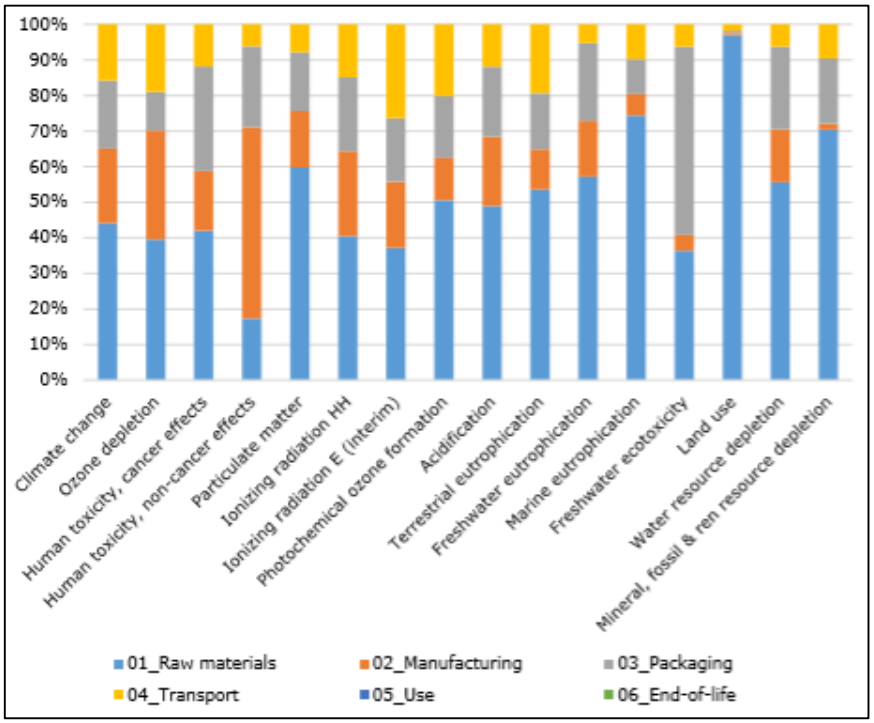


- Packaging → highest contribution with a share of total impacts between 20% and 50% in nearly all impact categories.
- End-of-life also represents an important life stage.

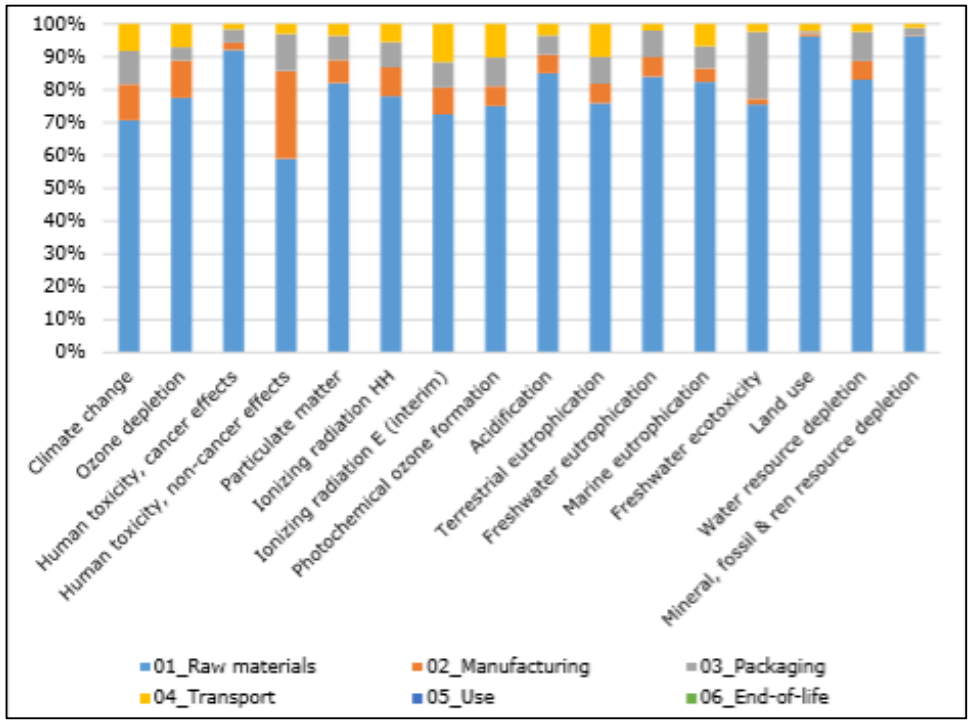
European Commission

Technical analysis

Skin care product (leave on)



Sun care product



- higher contribution to the environmental performance is the **raw material extraction**

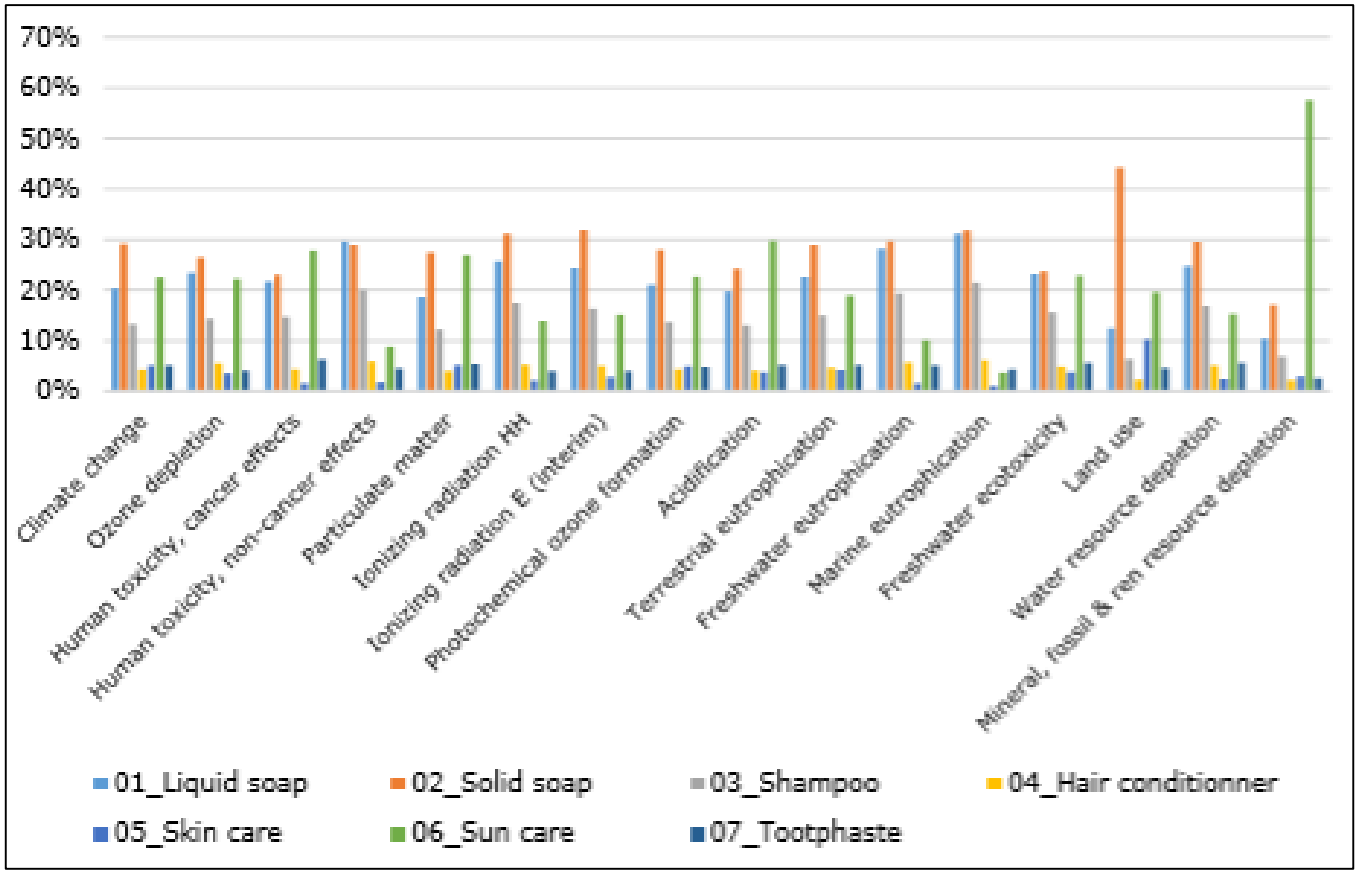
Joint Research Centre

European Commission

Technical analysis

Comparison of products

- **Highest environmental impact → sun care products and liquid soap.**



Existing EU Ecolabel criteria	Criteria proposal	Environmental aspects	
Criterion 1. Toxicity to aquatic organisms: Critical Dilution Volume (CDV)	Criterion 1. Toxicity to aquatic organisms: Critical Dilution Volume (CDV)	Hazardous substances Emission to soil/ water	It limits the hazardous substances that can be included in the product, limiting environmental and health risks for users.
Criterion 2. Biodegradability	Criterion 2. Biodegradability		It ensures that the overall aquatic toxicity is limited.
Criterion 3. Excluded or limited substances and mixtures	Criterion 3. Excluded or limited substances and mixtures		It ensures that the ingredients are biodegradable and will not persist in water.
Criterion 4. Packaging	Criterion 4. Packaging	Raw materials extraction and processing Spillage during use phase	It ensures prevention of spillage during use and promotes the minimisation of use of plastics and its recyclability.
Criterion 5. Sustainable sourcing of palm oil, palm kernel oil and their derivatives	Criterion 5. Renewable ingredients		It promotes that renewable ingredients used for the cosmetic manufacturing comes from sustainable origin.
Criterion 6. Fitness for use	Criterion 6. Fitness for use	Efficiency during use	It guarantees that the product meets quality requirements foreseen for the different applications.
Criterion 7. Information on EU Ecolabel	Criterion 7. Information on EU Ecolabel		It informs consumers on the environmental benefits associated with the product, in order to encourage the purchase of the product.

Summary of the preliminary report : Focus on revised scope

European Commission

Questions and comments?

Joint Research Centre

Agenda

- Political objectives of the EU Ecolabel and process description
- Summary of the preliminary report : Focus on revised scope
- Criterion 1. Toxicity to aquatic organisms: Critical Dilution Volume (CDV)
- Criterion 2. Biodegradability
- Criterion 3. Excluded or limited substances and mixtures
- Criterion 4. Packaging
- Criterion 5. Renewable ingredients
- Criterion 6. Fitness for use
- Criterion 7. Information on the EU Ecolabel
- Conclusion, next steps and closure of the workshop

Criterion 1. Toxicity to aquatic organisms: Critical Dilution Volume (CDV)

European Commission

Existing criterion

- The **critical dilution volume toxicity (CDV)** → risk-based parameter that combines the amount used, the (aerobic) biodegradability and the aquatic toxicity of the substances.
- The critical dilution volume toxicity (CDV) is **calculated** for each ingredient (i) and for the whole product using the following equation:

$$\textbf{CDV(ingredient i)= weight (i) } \times \textbf{ DF(i) } \times \textbf{ 1 000/TF chronic (i)}$$

$$CDV = \Sigma\ CDV(\text{ingredient i})$$

weight (i): weight of the ingoing substance (in grams) per 1 gram of AC.
DF (i):is the degradation factor of the ingoing substance
TF chronic (i):is the toxicity factor of the ingoing substance (in milligrams/litre)

Joint Research Centre

Criterion 1. Toxicity to aquatic organisms: Critical Dilution Volume (CDV)

European Commission

Existing criterion 1. Toxicity to aquatic organisms: Critical Dilution Volume (CDV)

The **total CDV** of the product shall not exceed the following values:

Product	CDV (l/g AC)
Shampoo, shower preparations and liquid soaps	**18 000**
Solid soaps	**3 300**
Hair conditioners	**25 000**
Shaving foams, shaving gels, shaving creams	**20 000**
Shaving solid soaps	**3 300**

Assessment and verification: the applicant shall provide the calculation of the CDV of the product. A spreadsheet for calculation of the CDV value is available on the EU Ecolabel website. The values of DF and TF chronic shall be as given in the DID list-part A. If the ingoing substance is not included in the DID list-part A, the applicant shall determine the values using the guidelines described in the DID list-part B and attaching the associated documentation (for more information see the Appendix).

Existing criterion 1. Toxicity to aquatic organisms: Critical Dilution Volume (CDV)

--------Appendix (excerpt) -------

Detergents Ingredients Database (DID) list

The DID list (Part A) is a list containing information of the aquatic toxicity and biodegradability of ingredients typically used in detergent formulations. The list includes information on the toxicity and biodegradability of a range of substances used in washing and cleaning products. The list is not comprehensive, but guidance is given in Part B of the DID list concerning the determination of the relevant calculation parameters for substances not present on the DID list (e.g. the Toxicity Factor (TF) and degradation factor (DF), which are used for calculation of the critical dilution volume). The list is a generic source of information and substances present on the DID list are not automatically approved for use in EU Ecolabelled products.

Part A and Part B of the DID list can be found on the EU Ecolabel website at:

http://ec.europa.eu/environment/ecolabel/documents/did_list/didlist_part_a_en.pdf

http://ec.europa.eu/environment/ecolabel/documents/did_list/didlist_part_b_en.pdf

For substances with no data regarding aquatic toxicity and degradability, structure analogies with similar substances may be used to assess the TF and DF. Such structure analogies shall be approved by the competent body granting the EU Ecolabel license. Alternatively, a worst case approach shall be applied, using the parameters below:

Worst case approach:

	Acute toxicity			**Chronic toxicity**			**Degradation**		
Ingoing substance	**LC50/EC50**	**SF(acute)**	**TF(acute)**	**NOEC (1)**	**SF(chronic) (1)**	**TF(chronic)**	**DF**	**Aerobic**	**Anaerobic**
'Name'	**1 mg/l**	**10,000**	**0,0001**			**0,0001**	**1**	**P**	**N**

(1) If no acceptable chronic toxicity data are found, these columns are empty. In this case, TF(chronic) is defined as equal to TF(acute).

Criterion 1. Toxicity to aquatic organisms: Critical Dilution Volume (CDV)

European Commission

Revision

- During the **previous revision**, it was considered to modify the method for CDV calculation; however finally it was decided to **keep the calculation as it was** in criteria from 2007.

- **EU Ecolabel questionnaire** sent out to stakeholders → **56% of the respondents** consider that the **current limits for CDV are adequate**. (6% of the respondents consider they are too restrictive (industry representatives) other 10% of them think that they should be more restrictive)

- Different **Competent Bodies** have provided the CDV value of the products which currently have EU Ecolabel licences.

Product	Current CDV threshold (l/g AC)	Survey opinion			
		Range	Average	50th percentile	75th percentile
Shampoo, shower preparations and liquid soaps (41 products)	18 000	215–10 912	7 063	7 186	10409
Solid soaps	3 300				
Hair conditioners (2 products)	25 000	2957-3742	3350	-	-
Shaving foams, shaving gels and shaving creams	20 000	-	-	-	-
Shaving solid soaps	3 300	-	-	-	-

All EU Ecolabel products* have a CDV value **below 11000 l/g AC**

Nordic Swan	Blue Angel	Bra Miljöval
MORE RESTRICTIVE THAN EU ECOLABEL *The product's CDV must not exceed the following threshold values:*	**SAME CRITERION AS EU ECOLABEL**	*The ingredient must have an acute aquatic toxicity where LC50, EC50 and IC50 is > 1 mg/l.* *The ingredient must have a chronic aquatic toxicity where NOEC/ECx is > 0.1 mg/l.*

Type of product	*CDV chronic (l/g AC)*
Solid soap	*2000*
Other rinse-off products	*12000*
Type of product	***CDV chronic (l/dose)***
Foam soap	*1000*

The threshold values for the CDV of the Nordic Swan →**maximum CDV of 12000 l/g AC**.

All rinse-off products have the same CDV (except solid and foam soaps →2000 l/g AC and 1000 l/dose)

First proposal criterion 1. Toxicity to aquatic organisms: Critical Dilution Volume (CDV)

This criterion applies to final product

The total CDV toxicity of the product shall not exceed the limits in Table 1:

Table 1

CDV limits

Product	CDV (l/g AC)
Shampoo, shower preparations and liquid soaps	**11 000**
Solid soaps	**2000**
Hair conditioners	**12 000**
Shaving foams, shaving gels, shaving creams	**~~20 000~~12000**
Shaving solid soaps	**2000**
Feminine hygiene cosmetic products	**12000**
Toothpastes	**12000**
Skin care products	**12000**
Animal care products	**12000**

The CDV is calculated using the following equation:

$$\text{CDV} = \sum \text{CDV (ingoing substance i)} = \sum \text{weight (i)} \times \text{DF (i)} \times 1000/\text{TF chronic (i)}$$

Where:weight (i) — is the weight of the intentionally added substance (in grams) per 1 gram of AC (i.e. normalised weight contribution of the ingoing substance to the AC)

DF (i) — is the degradation factor of the intentionally added substance

TF chronic (i) — is the toxicity factor of the intentionally added substance (in milligrams/litre)

Assessment and verification: the applicant shall provide the calculation of the CDV of the product. […]

Criterion 1. Toxicity to aquatic organisms: Critical Dilution Volume (CDV)

European Commission

Changes introduced

- Align the EU Ecolabel with other regional ecolabels → **CDV thresholds are lowered** in this revision.
- The threshold values for "shampoo, shower preparation and liquid soaps" could be stricter → maximum value available for the products certified is lower than **11000 l/g AC.**
- For "Hair conditioners" and "shaving foams, shaving gels, shaving creams" which present high values due to the lack of data in previous revision, it is suggested to at least **align to Nordic Swan.**
- **Solid soap—2000 l/g AC** has been proposed as in line with Nordic Swan.
- New product categories in the scope → **12000 l/g AC** has been proposed as in line with Nordic Swan.
- Minor wording adjustments → intentionally added substances.
- Regarding **verification procedure**→ Difficulties to use the spreadsheet have been found by stakeholders. No changes have been introduced in the verification text at this stage.

Joint Research Centre

Criterion 1. Toxicity to aquatic organisms: Critical Dilution Volume (CDV)

European Commission

Questions and comments?

Question to stakeholders

-Opinions on:

- Should we promote solid soaps? How? Possibility to relax threshold values?
- Should shampoo category differentiate between liquid and solid shampoos?

-Stakeholders are requested to provide data on CDV values of existing and new proposed categories.

-Stakeholders are requested to provide suggestion on how verification could be improved.

Agenda

- Political objectives of the EU Ecolabel and process description
- Summary of the preliminary report : Focus on revised scope
- Criterion 1. Toxicity to aquatic organisms: Critical Dilution Volume (CDV)
- Criterion 2. Biodegradability
- Criterion 3. Excluded or limited substances and mixtures
- Criterion 4. Packaging
- Criterion 5. Renewable ingredients
- Criterion 6. Fitness for use
- Criterion 7. Information on the EU Ecolabel
- Conclusion, next steps and closure of the workshop

European Commission

Existing criterion

- Basic elements used for classification of aquatic environmental impacts are:
  - -Acute aquatic toxicity
  - -Potential for actual bioaccumulation
  - **-Degradation (biotic or abiotic) for organic chemicals;**
  - -Chronic aquatic toxicity.

Substances that **rapidly degrade** can be **quickly removed from the environment**. In the absence of rapid degradation in the environment a substance → potential to exert toxicity over a wide temporal and spatial scale.

- **Surfactants** in this respect are considered relevant due to the fact that they are used in **high amounts in liquid soaps, shampoos and conditioners**.

- **Most surfactants affect to a greater or lower extent the product toxicity to aquatic organisms**. The biological degradability varies according to the nature of the carbohydrate chain of the surfactant. In general, the linear chains are more readily degradable than branched chains.

Criterion 2. Biodegradability

Existing criterion 2: Biodegradability

(a) Biodegradability of surfactants

All surfactants shall be readily biodegradable under aerobic conditions and biodegradable under anaerobic conditions.

(b)Biodegradability of organic ingoing substances

The content of all organic ingoing substances in the product that are aerobically non-biodegradable (not readily biodegradable) (aNBO) and anaerobically non-biodegradable (anNBO) shall not exceed the limits in Table 2:

Product	aNBO (mg/g AC)	anNBO (mg/g AC)
Shampoo, shower preparations and liquid soaps	**25**	**25**
Solid soaps	**10**	**10**
Hair conditioners	**45**	**45**
Shaving foams, shaving gels, shaving creams	**70**	**40**
Shaving solid soaps	**10**	**10**

Assessment and verification: the applicant shall provide documentation for the degradability of surfactants, as well as the calculation of aNBO and anNBO for the product. A spreadsheet for calculating aNBO and anNBO values is available on the EU Ecolabel website.[...]

Existing criterion 2: Biodegradability

[…]

For both surfactants and aNBO and anNBO values, reference shall be done to the DID list. For ingoing substances which are not included in the DID list, the relevant information from literature or other sources, or appropriate test results, showing that they are aerobically and anaerobically biodegradable shall be provided as described in the Appendix.

In the absence of documentation in accordance with the above requirements, an ingoing substance other than a surfactant may be exempted from the requirement for anaerobic degradability if one of the following three alternatives is fulfilled:

1. Readily degradable and has low adsorption (A < 25 %);
2. Readily degradable and has high desorption (D > 75 %);
3. Readily degradable and non-bioaccumulating.

Testing for adsorption/desorption may be conducted in accordance with OECD guidelines 106.

--------Appendix (excerpt) -------

Documentation of ready biodegradability

The following test methods for ready biodegradability shall be used:

(1) Until 1 December 2015:

The test methods for ready biodegradability provided for in Directive 67/548/EEC, in particular the methods detailed in Annex V.C4 to that Directive, or their equivalent OECD 301 A-F test methods, or their equivalent ISO tests.

The 10 days window principle shall not apply for surfactants. The pass levels shall be 70 % for the tests referred to in Annex V.C4-A and C4-B to Directive 67/548/EEC (and their equivalent OECD 301 A and E tests and ISO equivalents), and shall be 60 % for tests C4-C, D, E and F (and their equivalent OECD 301 B, C, D and F tests and ISO equivalents).

or

The test methods provided for in Regulation (EC) No 1272/2008 […]

Existing criterion 2: Biodegradability

[…]

(2) After 1 December 2015:

The test methods provided for in Regulation (EC) No 1272/2008

Documentation of anaerobic biodegradability

The reference test for anaerobic degradability shall be EN ISO 11734, ECETOC No 28 (June 1988), OECD 311 or an equivalent test method, with the requirement of 60 % ultimate degradability under anaerobic conditions. Test methods simulating the conditions in a relevant anaerobic environment may also be used to document that 60 % ultimate degradability has been attained under anaerobic conditions.

Extrapolation for substances not listed in the DID-list

Where the ingoing substances are not listed in the DID-list, the following approach may be used to provide the necessary documentation of anaerobic biodegradability:

(1) Apply reasonable extrapolation. Use test results obtained with one raw material to extrapolate the ultimate anaerobic degradability of structurally related surfactants. Where anaerobic biodegradability has been confirmed for a surfactant (or a group of homologues) according to the DID-list, it can be assumed that a similar type of surfactant is also anaerobically biodegradable (e.g., C12-15 A 1-3 EO sulphate [DID No 8] is anaerobically biodegradable, and a similar anaerobic biodegradability may also be assumed for C12-15 A 6 EO sulphate). Where anaerobic biodegradability has been confirmed for a surfactant by use of an appropriate test method, it can be assumed that a similar type of surfactant is also anaerobically biodegradable (e.g., literature data confirming the anaerobic biodegradability of surfactants belonging to the group alkyl ester ammonium salts may be used as documentation for a similar anaerobic biodegradability of other quaternary ammonium salts containing ester-linkages in the alkyl chain(s)).

(2) Perform screening test for anaerobic degradability. If new testing is necessary, perform a screening test by use of EN ISO 11734, ECETOC No 28 (June 1988), OECD 311 or an equivalent method.

(3) Perform low-dosage degradability test. If new testing is necessary, and in the case of experimental problems in the screening test (e.g. inhibition due to toxicity of test substance), repeat testing by using a low dosage of surfactant and monitor degradation by 14C measurements or chemical analyses. Testing at low dosages may be performed by use of OECD 308 (August 2000) or an equivalent method.

European Commission

Previous revision

- Previous revision main discussions arose on the issue if, from the environmental point of view, all surfactants should be readily aerobically and anaerobically biodegradable. Several stakeholders disagreed with the **importance of the anaerobic biodegradability** and questioned its environmental relevance and feasibility of fulfilling the criterion.
- Finally it was proposed to keep the proposal → **all surfactants should be readily aerobically and anaerobically biodegradable**.
- The **threshold values for aerobic and anaerobic biodegradability** were extensively discussed during last revision.
- Main concerns regarding decreasing too much the values in the criterion on biodegradability of organic substances was related to the **consequences for the possibility of using perfumes in the product**.
- **Important part of non-biodegradable substances can be assigned to fragrances**; thus the concentration of perfume has direct influence on the biodegradability of the product.

European Commission

Current revision

- According to the feedbacks received in the questionnaire → stakeholders agree with sub-criterion a) on Biodegradability of surfactants;

- In relation to **sub-criterion b) on biodegradability of organic ingoing substances** → They point out that it is **not possible to use some ingredients when aNBO and anNBO values are not available**, as calculating the biodegradability of an ingredient is expensive; therefore manufacturers prioritize the inclusion of ingredients with biodegradability data. → EU Ecolabel products **formulation is very limited.**

  → 8% of respondents consider that thresholds **should be more restrictive.**

- Different Competent Bodies have provided the **aNBO and anNBO values** of the products which currently have EU Ecolabel licences.

Criterion 2. Biodegradability

Product	Current aNBO (mg/g AC)	Information provided			
		Range	Average	50th percentile	75th percentile
Shampoo, shower preparations and liquid soaps (41 products)	25	0,0 – 25,0	14,1	12,7	24,6
Solid soaps	10				
Hair conditioners (2 products)	45	9,3 – 13,6	11,5	-	-
Shaving foams, shaving gels and shaving creams	70	-	-	-	-
Shaving solid soaps	10	-	-	-	-

Max. threshold for aerobic non-biodegradability of the certified products* → **25,0 mg/g AC**

Product	Current anNBO (mg/g AC)	Information provided			
		Range	Average	50th percentile	75th percentile
Shampoo, shower preparations and liquid soaps (41 products)	25	0,0 – 25,0	17,2	23,2	24,6
Solid soaps	10				
Hair conditioners (2 products)	45	9,3 – 13,6	11,5	-	-
Shaving foams, shaving gels and shaving creams	40	-	-	-	-
Shaving solid soaps	10	-	-	-	-

Criterion 2. Biodegradability

European Commission

Nordic Swan	Blue Angel	Bra Miljöval
(a) Biodegradability of surfactants		
SAME CRITERION, WITH EXEMPTIONS: *The following are exempt from the requirement on anaerobic degradability:* • *Emulsifiers* • *Surfactants in toothpaste* In addition requirement on toothpaste: *Toothpaste must not contain sodium lauryl sulphate (SLS).*	**SAME CRITERION AS EU ECOLABEL**	*The surfactant must be readily biodegradable according to OECD 301, OECD 310 or an equivalent test.* *The surfactant must be anaerobically biodegradable to 60 % according to ECETOC No 28, ISO 11734, OECD 311 or an equivalent test.*

erion 2.
dability

(b) Biodegradability of organic ingoing substances		
Organic substances that are not readily biodegradable must not exceed the limits: **Type of product** / **aNBO** / **anNBO** / **mg/g AC** *Liquid soap, hand soap for industry, shampoo, shower gel, conditioner, bath foam, cleanser, exfoliant* — 15 — 15 *Solid soap* — 5 — 5 **mg/ dose** *Foam soap* — 2,5 — 2,5	**SAME CRITERION AS EU ECOLABEL**	*The ingredient must have a BCF < 500 or a log Kow < 4. Exceptions:* *a) LC50, EC50 and IC50 is > 100 mg/l or NOEC/ECx is > 10 mg/l.* *b) it can be shown that the preservative is broken down very quickly into substances whose BCF or log Kow satisfies the requirements.* *c) it is not bioavailable (molar mass > 700 g/mol).*
Nordic Swan includes restrictions for those products leave-on: *At least 95% by weight of the total content of organic ingoing substances must be:* - *readily biodegradable (OECD 301 A-F), and/or* - *lowest aquatic toxicity NOEC/ECx > 0.1 mg/l or EC/LC50 > 10.0 mg/l and not be bioaccumulable, and/or* - *lowest aquatic toxicity NOEC/ECx > 0.1 mg/l or EC/LC50 > 10.0 mg/l and be potentially biodegradable (OECD 302 A-C) and/or* - *lowest aquatic toxicity NOEC/ECx > 0.1 mg/l or EC/LC50 > 10.0 mg/l and not be bioavailable (molar weight > 700g/mol)* *Exempt are: UV filters in sun products*		

First proposal for criterion 2: Biodegradability

This criterion shall be fulfilled by each intentionally added substance at or above the concentration of 0,010 % weight by weight in the final product.

a) Biodegradability of surfactants

All surfactants shall be readily biodegradable under aerobic conditions and biodegradable under anaerobic conditions.

(b)Biodegradability of organic intentionally added substances

The content of all organic substances in the product that are aerobically non-biodegradable (not readily biodegradable) (aNBO) and anaerobically non-biodegradable (anNBO) shall not exceed the limits in Table 2:

Product	aNBO (mg/g AC)	anNBO (mg/g AC)
Shampoo, shower preparations and liquid soaps	**25**	**25**
Solid soaps	**10**	**10**
Hair conditioners	**15**	**15**
Shaving foams, shaving gels, shaving creams	**70**	**40**
Shaving solid soaps	**10**	**10**
Feminine hygiene cosmetic products	**15**	**15**
Toothpastes	**15**	**15**
Rinse-off skin care products	**15**	**15**
Animal care products	**15**	**15**

For leave-on skin care products:

At least 95% by weight of the total content of organic ingoing substances must be:

- *readily biodegradable (OECD 301 A-F), and/or*
- *lowest aquatic toxicity NOEC/ECx > 0.1 mg/l or EC/LC50 > 10.0 mg/l and not be bioaccumulable, and/or*
- *lowest aquatic toxicity NOEC/ECx > 0.1 mg/l or EC/LC50 > 10.0 mg/l and be potentially biodegradable (OECD 302 A-C) and/or*
- *lowest aquatic toxicity NOEC/ECx > 0.1 mg/l or EC/LC50 > 10.0 mg/l and not be bioavailable (molar weight > 700g/mol)*

Exempt are: UV filters in sun products

Assessment and verification: […]

European Commission

Changes introduced

- **No changes in sub criterion a** → biodegradability of surfactants.
- **Sub-criterion (b) Biodegradability** of organic ingoing substances:
  - Hair conditioners value is suggested to be lowered to 15 mg/g AC.
  - In line with Nordic Swan, a threshold of **15 mg/g AC** has been proposed for the new product categories.
  - As Nordic Swan includes restrictions for leave-on product, this restriction is suggested to be included for the **EU Ecolabel of the skin care product category.**

- According to 14% of the stakeholders → verification procedure is not appropriate because the information required is not always available. At this stage → **no changes have been introduced in the verification text.**

European Commission

Questions and comments?

Question to stakeholders

-Suggestions on how to clarify the text if needed are welcome,

-Nordic Swan includes the following exemptions on criterion on biodegradability of surfactants:

"The following are exempt from the requirement on anaerobic degradability:

Emulsifiers

Surfactants in toothpaste"

Are these exemptions considered relevant to be included?

-Stakeholders are requested to provide suggestion on how verification could be improved.

Agenda

- Political objectives of the EU Ecolabel and process description
- Summary of the preliminary report : Focus on revised scope
- Criterion 1. Toxicity to aquatic organisms: Critical Dilution Volume (CDV)
- Criterion 2. Biodegradability
- **Criterion 3. Excluded or limited substances and mixtures**
- Criterion 4. Packaging
- Criterion 5. Renewable ingredients
- **Criterion 6. Fitness for use**
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Criterion 3: Excluded or limited substances

European Commission

Main aim of this criterion

Reduce the content of substances of concern in the product formulation ensuring that the EU Ecolabel is only awarded to the least environmentally impacting products

Current criterion	Proposed revised criterion
(a) Specified excluded substances and mixtures	(a) Hazardous substances
(b) Hazardous substances and mixtures	(b) Specified excluded substances
(c) Ingoing substances listed in accordance with Article 59(1) of Regulation (EC) No 1907/2006	(c) Substances of very high concern
(d) Fragrances	(d) Fragrances
(e) Preservatives	(e) Preservatives
(f) Colourants	(f) Colourants
	(g) UV filters

New requirement

Joint Research Centre

European Commission

First proposal - Changes

- Wording slightly modified to align it with the wording of the most recently adopted EU Ecolabel criteria
- Impurities stated in the SDS, whose presence in the final product equals or exceeds 0.010%, shall comply with the same requirements as the intentionally added substances
- Several additional changes introduced – will be presented on case by case

Current Criterion 3 (b)

European Commission

(b) Hazardous substances and mixtures

According to Article 6(6) of Regulation (EC) No 66/2010, the EU Ecolabel may not be awarded to any product that contains substances meeting criteria for classification with the hazard statements or risk phrases specified in Table 3 in accordance with Regulation (EC) No 1272/2008 of the European Parliament and of the Council (4) or Council Directive 67/548/EC (5) or substances referred to in Article 57 of Regulation (EC) No 1907/2006. In case the threshold for classification of a substance or mixture with a hazard statement differs from the one of a risk phrase than the former prevails. The risk phrases in Table 3 generally refer to substances. However, if information on substances cannot be obtained, the classification rules for mixtures apply.

Substances or mixtures which change their properties through processing and thus become no longer bioavailable, or undergo chemical modification in a way that removes the previously identified hazard are exempted from criterion 3(b).

Table 3

Hazard statements and Risk Phrases

Hazard Statement	Risk Phrase
H300 Fatal if swallowed	R28
H301 Toxic if swallowed	R25
H304 May be fatal if swallowed and enters airways	R65
H310 Fatal in contact with skin	R27
H311 Toxic in contact with skin	R24
H330 Fatal if inhaled	R23/26
H331 Toxic if inhaled	R23
H340 May cause genetic defects	R46

Current Criterion 3 (b)

European Commission

H341 Suspected of causing genetic defects	R68
H350 May cause cancer	R45
H350i May cause cancer by inhalation	R49
H351 Suspected of causing cancer	R40
H360F May damage fertility	R60
H360D May damage the unborn child	R61
H360FD May damage fertility. May damage the unborn child	R60/61/60-61
H360Fd May damage fertility. Suspected of damaging the unborn child	R60/63
H360Df May damage the unborn child. Suspected of damaging fertility	R61/62
H361f Suspected of damaging fertility	R62
H361d Suspected of damaging the unborn child	R63
H361fd Suspected of damaging fertility. Suspected of damaging the unborn child.	R62-63
H362 May cause harm to breast fed children	R64
H370 Causes damage to organs	R39/23/24/25/26/27/28
H371 May cause damage to organs	R68/20/21/22
H372 Causes damage to organs through prolonged or repeated exposure	R48/25/24/23
H373 May cause damage to organs through prolonged or repeated exposure	R48/20/21/22
H400 Very toxic to aquatic life	R50
H410 Very toxic to aquatic life with long-lasting effects	R50-53
H411 Toxic to aquatic life with long-lasting effects	R51-53
H412 Harmful to aquatic life with long-lasting effects	R52-53

H413 May cause long-lasting harmful effects to aquatic life	R53
EUH059 Hazardous to the ozone layer	R59
EUH029 Contact with water liberates toxic gas	R29
EUH031 Contact with acids liberates toxic gas	R31
EUH032 Contact with acids liberates very toxic gas	R32
EUH070 Toxic by eye contact	R39-41
Sensitising substances	
H334: May cause allergy or asthma symptoms or breathing difficulties if inhaled	R42
H317: May cause allergic skin reaction	R43

For rinse-off cosmetic products, the substances in Table 4 are exempted from the obligation in Article 6(6) of Regulation (EC) No 66/2010 following application of Article 6(7) of the same Regulation.

Table 4

Derogated substances

Substances	Hazard statements	Risk phrases
Surfactants (in total concentrations < 20 % in the final product)	H412: Harmful to aquatic life with long-lasting effects H413: May cause long-term adverse effects to aquatic life	R52-53 R53
Fragrances (6)	H412: Harmful to aquatic life with long-lasting effects H413: May cause long-term adverse effects to aquatic life	R52-53 R53
Preservatives (7)	H411: Toxic to aquatic life with long-lasting effects H412: Harmful to aquatic life with long-lasting effects H413: May cause long-term adverse effects to aquatic life	R51-53 R52-53 R53
Zinc pyrithione (ZPT) used in anti-dandruff shampoos	H400 Very toxic to aquatic life	R50

Current Criterion 3 (b)

Assessment and verification: the applicant shall demonstrate compliance with criterion 3(b) for any ingoing substance or mixture present at concentrations greater than 0,010 % in the product.

A declaration of compliance shall be provided by the applicant supported, where appropriate, by the declarations from producer(s) of the raw materials that none of these ingoing substances and/or mixtures meet the criteria for classification with one or more of hazard statements or risk phrases listed in Table 3 in the form(s) and physical state(s) they are present in the product.

The following technical information related to the form(s) and physical state(s) of the ingoing substances and/or mixtures as present in the product shall be provided to support the declaration of non-classification:

(i)	For substances that have not been registered under Regulation (EC) No 1907/2006 and/or which do not yet have a harmonised CLP classification: Information meeting the requirements listed in Annex VII to that Regulation;
(ii)	For substances that have been registered under Regulation (EC) No 1907/2006 and which do not meet the requirements for CLP classification: Information based on the REACH registration dossier confirming the non-classified status of the substance;
(iii)	For substances that have a harmonised classification or are self-classified: safety data sheets where available. If these are not available or the substance is self-classified then information shall be provided relevant to the substances hazard classification according to Annex II to Regulation (EC) No 1907/2006;
(iv)	In the case of mixtures: safety data sheets where available. If these are not available then calculation of the mixture classification shall be provided according to the rules under Regulation (EC) No 1272/2008 together with information relevant to the mixtures hazard classification according to Annex II to Regulation (EC) No 1907/2006.

For substances listed in Annexes IV and V to Regulation (EC) No 1907/2006, which are exempted from registration obligations under point (a) and (b) of Article 2(7) of that Regulation, a declaration to this effect by the applicant shall suffice to comply with criterion 3(b).

A declaration on the presence of ingoing substances that fulfil the derogation conditions shall be provided by the applicant, supported, where appropriate, by declarations from the producer(s) of the raw materials. Where required for the derogation, the applicant shall confirm the concentrations of these ingoing substances in the final product.

European Commission

Sub-criterion 3 (a) Hazardous substances

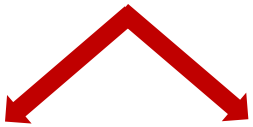
(i) Final product and (ii) Substances

Rationale

"The EU Ecolabel may not be awarded to goods containing substances or preparations/mixtures meeting the criteria for classification as toxic, hazardous to the environment, carcinogenic, mutagenic or toxic for reproduction in accordance with Regulation (EC) No 1272/2008".

EU Ecolabel Regulation (EC) No 66/2010 Article 6(6)

- **This criterion apply to each intentionally added substance present at or above the concentration of 0,010 % weight by weight in the final product.**
- The currently used interpretation of the grouping of hazards as per Regulation (EC) No 1272/2008 and the Task Force on Chemicals 1



Joint Research Centre

Carcinogenic, mutagenic or toxic for reproduction
Category 1A and 1B
H340 May cause genetic defects
H350 May cause cancer
H350i May cause cancer by inhalation
H360F May damage fertility
H360D May damage the unborn child
H360FD May damage fertility. May damage the unborn child
H360Fd May damage fertility. Suspected of damaging the unborn child
H360Df May damage the unborn child. Suspected of damaging fertility
Acute toxicity
Category 1 and 2
H300 Fatal if swallowed
H310 Fatal in contact with skin
H330 Fatal if inhaled
H304 May be fatal if swallowed and enters airways

List of CLP hazards

European Commission

Sub-criterion 3 (a) Hazardous substances

(i) Final product and (ii) Substances

Rationale

- **Currently granted derogations**

Substances	Hazard statements
Surfactants (in total concentrations < 20 % in the final product)	H412: Harmful to aquatic life with long-lasting effects H413: May cause long-term adverse effects to aquatic life
Fragrances	H412: Harmful to aquatic life with long-lasting effects H413: May cause long-term adverse effects to aquatic life
Preservatives	H411: Toxic to aquatic life with long-lasting effects H412: Harmful to aquatic life with long-lasting effects H413: May cause long-term adverse effects to aquatic life
Zinc pyrithione (ZPT) used in anti-dandruff shampoos	H400 Very toxic to aquatic life

- **Granting derogation ruled by the EU Ecolabel Regulation**
- **Certain conditions must be met:**
  - **when it is not technically feasible to substitute these substances as such, or via the use of alternative materials or designs,**
  - **or in case of products with significantly higher overall environmental performance compared to other goods of the same category**

Criterion 3: Excluded or limited substances

Nordic Swan	Blue Angel	Bra Miljöval
3(a) Hazardous substances		
Substances classified as environmentally hazardous according to Regulation 1272/2008/EEC may be included in the product to a maximum: *100·c H410+10·cH411+cH412 ≤ 2.5%* *where c is the fraction of the product, measured in percentage by weight, made up of the classified substance.* *Compounds of zinc (classified H410) may however be included in zinc ointment/cream marketed to heal irritated skin to a maximum of 25 % and may, in these cases, be exempted from the calculation.* *Surfactants, regardless of their function, classified with H411 or*	**SAME CRITERION AS EU ECOLABEL**	*Requirements only for specific ingredients:* • *surfactants* • *Preservatives* • *oils, fats and waxes (these ingredients that are exempt from registration according to Annex V of the REACH Regulation No 1907/2006)* • *emulsifier/emollient* • *additives* *The perfume or aroma (as such and not the individual substances) must not be hazardous to the aquatic environment according to the following classifications: H400, H410, H411, H413.*

European Commission

3(a) Hazardous substances

This criterion shall be fulfilled by each intentionally added substance present at or above the concentration of 0,010 % weight by weight in the final product.

3(a)(i) Final product

The final product shall not be classified in accordance with any of the hazard statements included in Table 3.

3(a)(ii) Substances

Substances that meet the criteria for classification with the hazard statements listed in Table 3 shall not be intentionally added in the final product.

Where stricter, the generic or specific concentration limits determined in accordance with Article 10 of Regulation (EC) No 1272/2008 shall take precedence.

Table 3 Restricted hazard statements

Acute toxicity	
Categories 1 and 2	**Category 3**
H300 Fatal if swallowed	H301 Toxic if swallowed
H310 Fatal in contact with skin	H311 Toxic in contact with skin
H330 Fatal if inhaled	H331 Toxic if inhaled
H304 May be fatal if swallowed and enters airways	EUH070 Toxic by eye contact
Specific target on organ toxicity	
Category 1	**Category 2**
H370 Causes damage to organs	H371 May cause damage to organs
H372 Causes damage to organs through prolonged or repeated exposure	H373 May cause damage to organs through prolonged or repeated exposure

Respiratory and skin sensitisation	
Category 1A	**Category 1B**
H317 May cause allergic skin reaction	H317 May cause allergic skin reaction
H334 May cause allergy or asthma symptoms or breathing difficulties if inhaled	H334 May cause allergy or asthma symptoms or breathing difficulties if inhaled
Carcinogenic, mutagenic or toxic for reproduction	
Categories 1A and 1B	**Category 2**
H340 May cause genetic defects	H341 Suspected of causing genetic defects
H350 May cause cancer	H351 Suspected of causing cancer
H350i May cause cancer by inhalation	
H360F May damage fertility	H361f Suspected of damaging fertility
H360D May damage the unborn child	H361d Suspected of damaging the unborn child
H360FD May damage fertility. May damage the unborn child	H361fd Suspected of damaging fertility. Suspected of damaging the unborn child
H360Fd May damage fertility. Suspected of damaging the unborn child	H362 May cause harm to breast fed children
H360Df May damage the unborn child. Suspected of damaging fertility	
Hazardous to the aquatic environment	
Categories 1 and 2	**Category 3 and 4**
H400 Very toxic to aquatic life	H412 Harmful to aquatic life with long-lasting effects
H410 Very toxic to aquatic life with long-lasting effects	H413 May cause long-lasting effects to aquatic life
H411 Toxic to aquatic life with long-lasting effects	
Hazardous to the ozone layer	
H420 Hazardous to the ozone layer	

European Commission

This criterion does not apply to substances covered by Article 2(7)(a) and (b) of Regulation (EC) No 1907/2006(*) which sets out criteria for exempting substances within Annexes IV and V to that Regulation from the registration, downstream user and evaluation requirements. In order to determine whether that exclusion applies, the applicant shall screen any intentionally added/formed substance at or above the concentration of 0.010% weight by weight in the final product.

[the content of the below table will be filled in as a result of the evaluation of justified derogation requests substantiated with technical rationale for the need of derogation, provided by the stakeholders to the project team]

Article 6(6) of Regulation (EC) No 66/2010(*) following application of Article 6(7) of the same Regulation.

Table 4 Derogated substances

Substances	Hazard statements

Derogation requests to be submitted

Criterion 3: Excluded or limited substances and mixtures

3 (a) Hazardous substances

Changes introduced

- **Aligning the wording to latest voted EU Ecolabel**
- **Removing the derogation for Zinc Pyrithione (ZPT) in anti-dandruff shampoo**
  - **Cosmetics Regulation → allowed up to 0.1% in leave-on products, up to 0.5% in rinse-off products and up to 1% in hair products**
  - **CLP classification as Repr 1B H360D under consideration by SCCS**
  - **In September 2018 ECHA RAC opinion on inclusion of ZPT into Annex VI of CLP (Repr 1B H360D and STOT RE1: H372)**
- **Exploring the status of other derogations**

Criterion 3 (a): Hazardous substances

Questions and comments?

Points for discussion

- **Justified requests for derogations for specific substances or substance groups (e.g. surfactants) should be provided using the derogation template form included in Annex 1 to Technical Report.**

5 ANNEX I. SUBSTITUTION INFORMATION AND DEROGATION REQUEST FORM

Stakeholders should fulfil to communicate the derogation from of substances that cannot be replaced and are not able to comply with article 6 (6) of the EU Ecolabel Regulation.

1. Common information requirements

To be treated as confidential?	☐Yes ☐No

Contact name	
Organisation	
Email	
Telephone No.	
Supplementary documents attached	

1a. Chemical substance name(s)	
1b. CAS, EC or Annex VI numbers	

Joint Research Centre

Current Criterion 3 (a)

European Commission

Existing criterion 3: Excluded or limited substances and mixtures

(a) **Specified excluded ingoing substances and mixtures**

The following ingoing substances and mixtures shall not be included in the product, neither as part of the formulation nor as part of any mixture included in the formulation:

(i) Alkyl phenol ethoxylates (APEOs) and other alkyl phenol derivatives;
(ii)Nitrilo-tri-acetate (NTA);
(iii) Boric acid, borates and perborates;
(iv) Nitromusks and polycyclic musks;
(v)Octamethylcyclotetrasiloxane (D4);
(vi)Butylated Hydroxi Toluene (BHT);
(vii) Ethylenediaminetetraacetate (EDTA) and its salts and non-readily biodegradable phosphonates;
(viii) The following preservatives: triclosan, parabens, formaldehyde and formaldehyde releasers.
(ix)The following fragrances and ingredients of the fragrance mixtures: Hydroxyisohexyl 3-cyclohexene carboxaldehyde (HICC), Atranol and Chloroatranol;
(x)Micro-plastics;
(xi) Nanosilver.

Assessment and verification: the applicant shall provide a signed declaration of compliance supported by declarations from manufacturers of mixtures, as appropriate, confirming that the listed substances and/or mixtures have not been included in the product.

European Commission

Sub-criterion 3 (b) Specified excluded substances

- **Lists substances that shall not be included in the product**
- **62% stakeholders agree with current formulation**
- **18% of stakeholders indicated it is necessary to add other substances**
- **Substances banned in the Cosmetics Regulation proposed to be removed**

European Commission

Sub-criterion 3 (b) Specified excluded substances

Stakeholders feedback

Proposed to be removed:

- **Butylated Hydroxi Toluene (BHT)**
- **Nitrilo-tri-acetate (NTA)**
- **All ingredients regulated already through the Cosmetics Regulation**

Proposed to be added:

- **Substances that meet the criteria for PBT or vPvB substances in accordance with Annex XIII of the REACH Regulation (EC) No. 1907/2006, or substances included in the Candidate list**
- **Per- and polyfluoroalkyl substances (PFAS) and other organic halogen compounds**
- **Endocrine disrupting chemicals**
- **Cyclic siloxanes**
- **Isothiazolinones**
- **Evernia furfuracea extract and Evernia prunastri extract**
- **Fragrance Tetramethyl acetyloctahydranophthalenes (OTNE)**
- **Nanopaticles**

European Commission

Other certification schemes

Nordic Swan	Blue Angel	Bra Miljöval
3(b) Specified excluded substances		
The following substances must not be present in the product or raw material: - *D5 (decamethylcyclopentasiloxane, CAS no 541-02-6)* - *D6 (dodecamethylcyclohexasiloxane CAS no 540-97-6)* - *BHA (butylated hydroxyanisole, CAS no 25013-16-5)* - *Perfluorinated and polyfluorinated substances* - *Hypochlorite, chloramine and sodium chlorite* - *Benzalkonium chloride* - *Phthalates* - *Substances considered to be (potential) endocrine disruptors in accordance with the European Union's reports concerning endocrine disruptors.* - *Halogenated and/or aromatic solvents.* - *Nanomaterials/particles as defined in the Cosmetics Regulation.* - *Substances that have been judged in the EU to be PBT (persistent, bioaccumulative and toxic) or vPvB (very persistent and very bioaccumulative), in accordance with*	*The following substances are not permitted in the end product, either as part of the formulation or as part of any preparation included in the formulation:* - *Phosphates* - *Phosphonates, which are aerobically not readily biodegradable* - *ETPA (diethylenetriaminepentaacetic acid and its salts)* - *5-bromo-5-nitro-1,3-dioxane*	*The product must not contain lead, cadmium, cobalt, chromium, mercury, nickel, cocamide DEA, nylon, polyethylene, organic halogen compounds, phthalates, cyclic siloxanes or specific endocrine disrupting chemicals.* *The product must not contain nanomaterials.* *The product must not contain substances that meet the criteria for PBT or vPvB substances in accordance with Annex XIII of REACH or substances included on the Candidate list.* *The product must not contain any of the sensitising substances:* *- Evernia furfuracea Extract* *- Evernia prunastri Extract*

European Commission

Sub-criterion 3 (b) Specified excluded substances

Rationale

5-bromo-5-nitro-1,3-dioxane

- **Bath, hair and personal care products**
- **Acts as preservative, and thus protecting cosmetic and personal care products from spoilage**
- **No harmonized classification**
- **Causes severe skin burns and eye damage, is very toxic to aquatic life with long lasting effects, is harmful if swallowed, causes serious eye damage, may cause an allergic skin reaction and causes skin irritation**
- **Restricted by Blue Engel**
- **Formaldehyde releaser → automatically restricted by revised criterion 3 (b)**

European Commission

Sub-criterion 3 (b) Specified excluded substances

Rationale

Benzalkonium chloride

- **Shampoos, personal cleanliness products, skin cleansers, and skin care and eye makeup preparations**
- **Performs several different functions, e.g. preservative, surfactant, deodorant**
- **No harmonized classification**
- **Causes severe skin burns and eye damage, is very toxic to aquatic life, is very toxic to aquatic life with long lasting effects, is harmful if swallowed, is harmful in contact with skin, is harmful if inhaled and causes serious eye damage**
- **Restricted by Nordic Swan**
- **Proposed to be added to the list of revised criterion 3 (b)**

European Commission

Sub-criterion 3 (b) Specified excluded substances

Rationale

Butylated hydroxyanisole (BHA)

- **Cosmetics and personal care products**
- **Antioxidant properties**
- **No harmonized classification**
- **Is toxic to aquatic life with long lasting effects, causes serious eye irritation, is suspected of causing cancer, is suspected of damaging fertility or the unborn child, is harmful if swallowed and causes skin irritation**
- **Restricted by Nordic Swan**
- **Proposed to be added to the list of revised criterion 3 (b)**

European Commission

Sub-criterion 3 (b) Specified excluded substances

Rationale

Cocamide DEA

- **Shampoos, hair dyes, bath products, and lotions**
- **Type of fatty acids derivatives of diethanolamine (DEA)**
- **No harmonized classification**
- **Causes serious eye damage, is harmful to aquatic life with long lasting effects and causes skin irritation**
- **Restricted by Bra Miljoval**
- **Proposed to be added to the list of revised criterion 3 (b)**

European Commission

Sub-criterion 3 (b) Specified excluded substances

Rationale

Cyclic siloxane compounds (D5 and D6)

- **Hair care products, liquid soaps, gels and decorative cosmetics**
- **Different purposes: softeners, solvents, anti-static agents, moisturisers, anti-foaming agents, to control viscosity, anti-perspirants**
- **No harmonized classification but included in REACH SVHC Candidate List (*vPvB substances*)**
- **Restricted by Nordic Swan**
- **Automatically restricted according to revised criterion 3 (c)**

European Commission

Sub-criterion 3 (b) Specified excluded substances

Rationale

Endocrine disruptors

- **Definition by the International Programme on Chemical Safety in 2002:**

  "an exogenous substance or mixture that alters function(s) of the endocrine system and consequently causes adverse health effects in an intact organism, or its progeny, or (sub)populations"

- **No specific provisions in the Cosmetics Regulation → subject to case-by-case regulatory action**
- **Specific restrictions or bans, e.g. parabens and 3-Benzylidene Camphor**
- **In REACH substances with endocrine disrupting effects are considered under Article 57, as substances which should be included in Annex XIV (i.e. List of substances subject to authorisation)**
- **Restricted by Nordic Swan**
- **Automatically restricted according to revised criterion 3 (c)**

European Commission

Sub-criterion 3 (b) Specified excluded substances

Rationale

ETPA (diethylenetriaminepentaacetic acid and its salts)

- **Hair dyes and colors, noncoloring hair products, and bath products**
- **Chelating agents (compounds that bind metals)**
- **No harmonized classification**
- **Cause serious eye irritation, cause skin irritation, may cause respiratory irritation, are harmful if swallowed, are harmful in contact with skin, are harmful if inhaled and are suspected of damaging fertility or the unborn child**
- **Restricted by Blue Angel**
- **Proposed to be added to the list of revised criterion 3 (b)**

European Commission

Sub-criterion 3 (b) Specified excluded substances

Rationale

Evernia furfuracea (Tree moss) extract and Evernia prunastri (Oak moss) extract

- **Two natural fragrances**
- **Contain two allergenic constituents: chloroantranol (Evernia furfuracea) and atranol (Evernia prunastri)**
- **Are currently on the list of current criterion 3 (a)**
- **Restricted by Nordic Swan and Bra Miljoval**
- **Excluded from cosmetics products through the amendment to the Cosmetics Regulation**
- **Proposed to be removed from the list of revised criterion 3 (b)**

European Commission

Sub-criterion 3 (b) Specified excluded substances

Rationale

Halogenated and/or aromatic solvents

- **Many halogenated and aromatic solvents, e.g.:**
  - **Aniline, its salts and its halogenated and sulphonated derivatives**
  - **Toluidines, their isomers, salts and halogenated and sulphonated derivatives**
  - **Xylidines, their isomers, salts and halogenated and sulphonated derivatives)**

  prohibited in cosmetics according to Cosmetics Regulation or have a harmonised classification
- **Restricted by Nordic Swan and Bra Miljoval**
- **Automatically restricted by Cosmetics Regulation or criterion 3 (a)**

European Commission

Sub-criterion 3 (b) Specified excluded substances

Rationale

Hypochlorite, chloramine and sodium chlorite

- **Used in cosmetics as oxidising and antimicrobial substances**
- **Calcium hypochlorite: harmonised classification as H302 (harmful if swallowed), H314 (causes severe skin burns and eye damage) and H400 (very toxic to aquatic life) → automatically restricted by criterion 3 (a)**
- **Sodium hypochlorite, solution … % Cl active: harmonized classification as H314 (causes severe skin burns and eye damage), H318 (causes serious eye damage), H400 (very toxic to aquatic life) and H410 (very toxic to aquatic life with long-lasting effects) → automatically restricted by criterion 3 (a)**
- **Sodium hypochlorite (other than above), chloramine and sodium chlorite:**
  - **No harmonized classification**
  - **Cause severe skin burns and eye damage, are very toxic to aquatic life, very toxic to aquatic life with long lasting effects, causes serious eye damage, may intensify fire (oxidiser), and are harmful if swallowed**
- **Restricted by Nordic Swan**
- **Proposed to be added to the list of revised criterion 3 (b)**

European Commission

Sub-criterion 3 (b) Specified excluded substances

Rationale

Nanomaterials

- **Definition by Cosmetics Regulation:**

  "an insoluble or biopersistant and intentionally manufactured material with one or more external dimensions, or an internal structure, on the scale from 1 to 100 nm"

- **Cosmetics Regulation does not cover nanomaterials, unless specifically mentioned**
- **Restricted in Nordic Swan and Bra Miljoval**
- **In EU Ecolabel → evaluation on a case-by-case basis**

Nanosilver

- **used as preservative**
- **already excluded from EU Ecolabel products due to its aquatic toxicity (current criterion 3 (a))**

European Commission

Sub-criterion 3 (b) Specified excluded substances

Rationale

Nanomaterials

NanoTiO_2

- **used as UV filter**
- **Discussed in criterion 3 (g)**

European Commission

Sub-criterion 3 (b) Specified excluded substances

Rationale

PBT or vPvB substances

- **Substances classified as PBT (Persistent, Bioaccumulative and Toxic) or vPvB (very Persistent and very Bioaccumulative) in accordance with Annex XIII of the REACH Regulation**
- **Automatically restricted by criterion 3 (c)**

European Commission

Sub-criterion 3 (b) Specified excluded substances

Rationale

Perfluorinated Alkylated Substances (PFAS) and other perfluorinated compounds

- **Hair and skin conditioners, but mainly eye shadow, foundation, facial powder, bronzer, and blush (not included in the revised scope)**
- **Most common PFAS:**
  - **Perfluorooctane sulfonic acid – PFOS**
  - **Perfluorooctanoic acid – PFOA**
  - **Perfluorononanoic acid – PFNA**
  - **Perfluorooctane sulfonaminde – PFOSA**

  All have a harmonised classification
- **Restricted by Nordic Swan**
- **Automatically restricted by criterion 3 (a)**

European Commission

Sub-criterion 3 (b) Specified excluded substances

Rationale

Phosphates

- **Mainly as Sodium Phosphate, Disodium Phosphate and Trisodium Phosphate**
- **Used in bath products, colognes, dentifrices, mouthwashes, hair conditioners, hair dyes and colors, permanent waves, shampoos, makeup and skin care products**
- **No harmonized classification**
- **Cause severe skin burns and eye damage, cause serious eye damage, cause serious eye irritation, cause skin irritation and may cause respiratory irritation**
- **Restricted by Blue Angel**
- **Proposed to be added to the list of revised criterion 3 (b)**

European Commission

Sub-criterion 3 (b) Specified excluded substances

Rationale

Phosphonates which are aerobically not readily biodegradable

- **Used in detergents**
- **Restricted by Blue Engel**
- **Automatically restricted by criterion 2 on biodegradability**

European Commission

Sub-criterion 3 (b) Specified excluded substances

Rationale

Phthalates

- **Different functions, such as film formation, masking and solvents**
- **Restricted by Nordic Swan**
- **Relevant phthalates used in cosmetics with harmonized classification :**
  - **BBP (Benzyl butyl phthalate), used in hair spray (H400, H410, H360DF)**
  - **DBP (Dibutyl phthalate), used in perfumes, deodorants, hair sprays (H400, H360DF)**
  - **DCHP (Dicyclohexyl phthalate, used in perfumes and cosmetics (H317, H360D)**

  Automatically restricted by criterion 3 (a)
- **Other phthalates with CLP hazards reported in individual entries (and restricted by other certification schemes):**
  - **DNOP (Di-n-Octyl-Phthalate), suspected H361, H317, and H413**
  - **DEP (Diethyl phthalate), suspected H319, H331 and H373**

  Proposed to be added to the list of revised criterion 3 (b)

European Commission

Sub-criterion 3 (b) Specified excluded substances

Rationale

Sodium Lauryl Sulfate (SLS)

- **Used as surfactant, emulsifier and to contribute to foaming (in toothpaste)**
- **No harmonized classification**
- **Harmful if swallowed, causes serious eye damage, is harmful to aquatic life with long lasting effects, is a flammable solid, is harmful if inhaled, causes skin irritation and may cause respiratory irritation**
- **Banned in toothpaste by Nordic Swan in favour of alternative surfactants less irritating to the skin (e.g. sodium-C14-C16 oleofin sulphonate, sodium lauryl sarcosinate, cocamidopropyl betaine or Stearath 30)**
- **Proposed to be added to the list of revised criterion 3 (b) – consideration on the scope of this exclusion**

European Commission

Sub-criterion 3 (b) Specified excluded substances

Rationale

Tetramethyl acetyloctahydranophthalenes (OTNE)

- **Synthetic ketone used as a fragrance ingredient in perfumes, laundry products and cosmetics**
- **No harmonized classification**
- **Causes skin irritation, may cause an allergic skin reaction and is very toxic to aquatic life with long lasting effects**
- **Proposed to be added to the list of revised criterion 3 (b)**

European Commission

Sub-criterion 3 (b) Specified excluded substances

3(b) Specified excluded substances

The substances listed below shall not be intentionally added in the final product:

(i) Alkyl phenol ethoxylates (APEOs) and other alkyl phenol derivatives;

(ii)——Nitromusks and polycyclic musks;

(iii)Butylated Hydroxi Toluene (BHT) and Butylated hydroxyanisole (BHA);

(iv)Ethylenediaminetetraacetate (EDTA) and its salts and non-readily biodegradable phosphonates;

(v)The following preservatives: triclosan, parabens, formaldehyde releasers, benzalkonium chloride;

(vi)Microplastics (*);

(vii)Nanosilver;

(viii)The fragrance tetramethyl acetyloctahydranophthalenes (OTNE);

(ix)Sodium hypochlorite, chloramine and sodium chlorite;

(x)ETPA (diethylenetriaminepentaacetic acid and its salts);

(xi)Cocamide DEA;

(xii)The phthalates Di-n-Octyl-Phthalate (DNOP) and Diethyl phthalate (DEP);

(xiii)Sodium Lauryl Sulfate (SLS)

(xiv)Substances classified as endocrine disruptors.

European Commission

Sub-criterion 3 (b) Specified excluded substances

Changes introduced

- **Removed from the list:**
  - **Nitrilo-tri-acetate (NTA);**
  - **Boric acid, borates and perborates;**
  - **Octamethylcyclotetrasiloxane (D4);**
  - **Hydroxyisohexyl 3-cyclohexene carboxaldehyde (HICC), Atranol and Chloroatranol;**
  - **Formaldehyde**

  All prohibited due to EU legislation (amendments, ATPs, etc.)

- **Added: definition of microplastic according to REACH**

  "particles with a size of below 5 mm of insoluble macromolecular plastic, obtained through one of the following processes: (a) a polymerisation process such as polyaddition or polycondensation or a similar process using monomers or other starting substances; (b) chemical modification of natural or synthetic macromolecules; (c) microbial fermentation"

European Commission

Sub-criterion 3 (b) Specified excluded substances

Changes introduced

- **Added to the list:**
  - **The preservative benzalkonium chloride;**
  - **Butylated hydroxyanisole (BHA);**
  - **Cocamide DEA;**
  - **ETPA (diethylenetriaminepentaacetic acid and its salts);**
  - **Sodium hypochlorite, chloramine and sodium chlorite;**
  - **The phthalates Di-n-Octyl-Phthalate (DNOP) and Diethyl phthalate (DEP);**
  - **Sodium Lauryl Sulfate (SLS);**
  - **The fragrance tetramethyl acetyloctahydranophthalenes (OTNE);**

Criterion 3 (b): Specified excluded substances

Questions and comments?

Points for discussion

- **Any other substances with potential endocrine disrupting properties that should be covered by criterion 3 (b)?**
- **Any other nanomaterials that should be covered by criterion 3 (b)?**
- **Opinion on substances proposed to be added to the list**
- **Microorganisms should be allowed (given the trend of using probiotics in cosmetics) (comment on BATIS)**

Current criterion 3 (c)

European Commission

(c) Ingoing substances listed in accordance with Article 59(1) of Regulation (EC) No 1907/2006

No derogation from the exclusion in Article 6(6) of Regulation (EC) No 66/2010 shall be given concerning ingoing substances identified as substances of very high concern and included in the list provided for in Article 59(1) of Regulation (EC) No 1907/2006 (8), present in the product in concentrations higher than 0,010 % (weight by weight).

Assessment and verification: reference to the list of substances identified as substances of very high concern shall be made on the date of application. The applicant shall provide the full formulation of the product to the competent body. The applicant shall also provide a declaration of compliance with criterion 3(c), together with related documentation, such as declarations of compliance signed by the material suppliers and copies of relevant safety data sheets for substances or mixtures.

Revised criterion 3 (c)

3(c) Substances of very high concern (SVHCs)

The final product shall not contain any intentionally added substances that have been identified in accordance with the procedure described in Article 59(1) of Regulation (EU) No 1907/2006 which establishes the candidate list for substances of very high concern at or above the concentration of 0.010% weight by weight in the final product.

European Commission

Sub-criterion 3 (c) Substances of very high concern (SVHCs)

Changes introduced

- Direct link with the EU Ecolabel Regulation (EC):

  "No derogation shall be given concerning substances that meet the criteria of Article 57 of Regulation (EC) No 1907/2006 (REACH) and that are identified according to the procedure described in Article 59(1) of that Regulation, present in mixtures, in an article or in any homogeneous part of a complex article in concentrations higher than 0,1 % (weight by weight)".

- Updated list of SVHCs is available on the European Chemicals Agency website: http://echa.europa.eu/web/guest/candidate-list-table.
- Referring to the latest version of this list at the date of application
- Text has been aligned with the most recently adopted EU Ecolabel criteria.

European Commission

Criterion 3 (c): Substances of very high concern (SVHCs)

Questions and comments?

Current criterion 3 (d)

European Commission

(d) Fragrances

(i)Products marketed as designed and intended for children shall be fragrance-free.

(ii)Any ingoing substance or mixture added to the product as a fragrance shall be manufactured and handled following the code of practice of the International Fragrance Association (IFRA). The code can be found on the IFRA website: http://www.ifraorg.org. The recommendations of the IFRA Standards concerning prohibition, restricted use and specified purity criteria for materials shall be followed by the manufacturer.

Assessment and verification: the applicant shall provide a signed declaration of compliance, supported by a declaration of the fragrance manufacturer, as appropriate.

Sub-criterion 3 (d) Fragrances

Rationale

- Many fragrances classified as sensitizers (H317) under CLP Regulation
- 44% of respondents agree with the current criterion
- 28% of them would like to modify the criterion
- Half of the latter considers that the restriction for fragrances should be stricter
- One stakeholder thinks the requirement reflects *much less than the 10-20%* of the market
- Some consider it necessary to use fragrances in baby products with specific restrictions for this product type
- This is believed to be an important characteristic for a product to be successful on the market

Criterion 3: Excluded or limited substances

Nordic Swan	Blue Angel	Bra Miljöval
3(d) Fragrances		
SAME CRITERION AS EU ECOLABEL *Exceptions: Flavourings are allowed in children's toothpaste.*	**MORE RESTRICTIVE THAN EU ECOLABEL**	**MORE RESTRICTIVE THAN EU ECOLABEL**
A fragrance which is judged to be sensitising with the hazard statement H317 and/or H334, or covered by the fragrance substances subject to declaration may be included at a maximum of 0.001% in leave-on products and a maximum of 0.01% in rinse-off products. *The fragrance substances: Cananga Odorata and Ylang-ylang oil, Eugenia Caryophyllus Leaf, and Jasminum Grandiflorum may be included in products with a maximum of 0.010% for rinse-off products and a maximum of 0.0010% for leave-on products.*	*Fragrances, which must be specified according to Annex III of the cosmetics regulation (Regulation (EC) No. 1223/2009), may not be contained in the product in concentrations ≥0.010% per substance.*	*No more than 0.50 % by weight perfume and aroma combined is permitted in the product.* *Individual fragrances or flavours classified with H317 must not exceed a concentration of 0.01% by weight in rinse-off products and 0.001% by weight in leave-on products.* *Substances listed in the table below, and the ones listed in Annex III to the Cosmetics Regulation (EC) No 1223/2009 must not exceed a concentration of 0.01% by weight in rinse-off products and 0.001% by weight in leave-on products. This requirement applies irrespective of the function of the substance in the product.* Cananga Odorata and Ylang-ylang oil, Eugenia Carophyllus Leaf/Flower oil, Jasminum grandiflorum/ officinale, Myroxylon Pereirae, Santalum Album, Turpentine oil, Cinnamomum cassia leaf oil/ Cinnamomum zeylanicum extract

Revised criterion 3 (d)

3(d) Fragrances

(i)Products marketed as designed and intended for children shall be fragrance-free.

(ii)Any substance or mixture added to the product as a fragrance shall be manufactured and handled following the code of practice of the International Fragrance Association (IFRA). The code can be found on the IFRA website: http://www.ifraorg.org. The recommendations of the IFRA Standards concerning prohibition, restricted use and specified purity criteria for materials shall be followed by the manufacturer.

Changes introduced

- **No changes have been introduced so far in this sub-requirement**

European Commission

Criterion 3 (d): Fragrances

Questions and comments?

Points for discussion

- **Possibility of limiting the amount of fragrances, which must be specified according to Annex III of the Cosmetics Regulation, i.e. allergenic substances**
- **Lower thresholds for leave-on products?**
- **Need to differentiate for baby products?**

Current criterion 3 (e)

(e) Preservatives

(i)Preservatives in the product shall not release or degrade to substances that are classified in accordance with the requirements of criterion 3(b).

(ii) The product may contain preservatives provided that they are not bioaccumulating. A preservative is not considered bioaccumulating if BCF < 100 or log Kow < 3.0. If both BCF and log Kow values are available, the highest measured BCF value shall be used.

Assessment and verification: the applicant shall provide a signed declaration of compliance, together with copies of the safety data sheets of any preservative added, and information on its BCF and/or log Kow values.

European Commission

Sub-criterion 3 (e) Preservatives

Rationale

- 60% of respondents agree with the current criterion
- 8% of them disagree
- Other certification schemes are less stringent than EU Ecolabel formulation

Nordic Swan	Blue Angel	Bra Miljöval
3(e) Preservatives		
The use of preservatives for purposes other than preservation of the product itself is prohibited.	*The end product may only include preservatives in order to preserve the product and in the appropriate dosage for this purpose. This does not refer to surfactants, which may also have preserving properties.* *It is prohibited to state or suggest on the packaging or by any other means that the product has an antimicrobial action.*	*Biocides must only be used to preserve the product, including its ingredients, during storage and use.*
Preservatives must not be bioaccumulating: BCF<500 or log Kow<4. *These requirements also apply to antibacterial disinfecting and microbial substances.*		*The ingredient must have a BCF < 500 or a log Kow < 4.*

European Commission

Sub-criterion 3 (e) Preservatives

Rationale – focus on isothiazolinones

- Widely used in cosmetics because of their high efficacy and the broad spectrum of pH at which they are effective even at low concentrations
- *Difficult to be replaced!*
- Chloromethylisothiazolinone (CMIT) and methylisothiazolinone (MIT) most used ones, with MIT reported as a sensitizing agent by SCCS with suspected toxicity to the aquatic environment
- Cosmetics Regulation → MIT and CMIT/MIT in a 3:1 ratio restricted
  - in leave-on products (no safe concentration is possible)
  - **in rinse-off products** (presence limited at 15 ppm (0.0015 %))
- Further restrictions appear difficult to achieve
- Possible alternatives (e.g. organic acids, sodium benzoate, potassium sorbate, essential oils, anti-oxidants and phenoxyethanol) ensure lower protection, are only effective against yiests, bacteria OR fungi, and/or may form carcinogenic by-products with other ingredients in the formulation

European Commission

3(e) Preservatives

(i) Preservatives in the product shall not release or degrade to substances that are classified in accordance with the requirements of criterion 3(b).
(ii) The product may contain preservatives provided that they are not bioaccumulating. A preservative is not considered bioaccumulating if BCF < 100 or log Kow < 3.0. If both BCF and log Kow values are available, the highest measured BCF value shall be used.

Changes introduced

- **No changes have been introduced so far in this sub-requirement**

European Commission

Criterion 3 (e): Preservatives

Questions and comments?

Points for discussion

- **New research/approaches for effective replacing MIT?**

Current criterion 3 (f)

European Commission

(f) Colorants

Colorants in the product must not be bioaccumulating. A colorant is considered not bioaccumulating if BCF < 100 or log Kow < 3.0. If both BCF and log Kow values are available, the highest measured BCF value shall be used. In the case of colouring agents approved for use in food, it is not necessary to submit documentation of bioaccumulation potential.

Assessment and verification: the applicant shall provide copies of the safety data sheets of any colorant added together with information on its BCF and/or log Kow value, or documentation to ensure that the colouring agent is approved for use in food.

European Commission

Sub-criterion 3 (f) Colorants

Rationale

- 50% of respondents agree with the current criterion
- 5% of them would like a maximum content of colorants in a product
- Nordic Swan and Bra Miljöval: the colorant must be approved as a food additive, excluding about ten colorants with logKow values up to 17, which are approved under the Cosmetics Regulation

Nordic Swan	Blue Angel	Bra Miljöval
3(f) Colorants		
Organic colorants must not be bioaccumulating: BCF<500 or logKow<4. Alternatively, the colour must be approved for use in food. *None of barium, lead, mercury, cadmium, six inhalant chromium, nickel or bismuth may be found in colourants for decorative cosmetics and hair dye in concentrations above 0.0010%.*	**SAME CRITERION AS EU ECOLABEL**	**MORE RESTRICTIVE THAN EU ECOLABEL** *The colouring agent must be approved as a food additive (colour) according to Regulation (EC) No 1333/2008 on food additives.*

Revised criterion 3 (f)

3(f) Colorants

Colorants in the product must not be bioaccumulating. A colorant is considered not bioaccumulating if BCF < 100 or log Kow < 3.0. If both BCF and log Kow values are available, the highest measured BCF value shall be used. In the case of colouring agents approved for use in food, it is not necessary to submit documentation of bioaccumulation potential.

Changes introduced

- **No changes have been introduced so far in this sub-requirement**

European Commission

Criterion 3 (f): Colourants

Questions and comments?

Points for discussion

- **Possibility of requiring that the colorant must be approved as a food additive according to Regulation 1333/2008?**
- **Maximum content of colorants to be required?**

Revised criterion 3 (g)

New requirement

3(g) UV filters

UV filters may only be added to leave-on products and only to protect the user – not the product.

All organic UV filters contained in the product:

- must not be bioaccumulating (BCF<100/logKow<3) or must have a lowest measured toxicity of NOEC/ECx > 0.1 mg/l or EC/LC50 > 10.0 mg/l

-if including nano TiO_2, must fulfil the conditions expressed in SCCS/1516/13 (*)

-if including nano TiO_2 coated with either silica and cetyl phosphate (up to 16% and 6% respectively); alumina and manganese dioxide (up to 7% and 0.7% respectively); or alumina and triethoxycaprylylsilane (up to 3% and 9% respectively), the product must not be in the form of powders or sprayable products

European Commission

Sub-criterion 3 (g) UV filters

Rationale

- Sun screen are a special class of leave-on products as are expected to be released directly to the sea (no treatment)

Nordic Swan	Blue Angel	Bra Miljöval
3(g) UV filters		
UV filters may only be added to leave-on products and only to protect the user – not the product *Nano UV filters are banned (exemptions: nano TiO2 filters)* *Must not be bioaccumulating (BCF<500/logKow<4) OR must have a lowest measured toxicity of NOEC/ECx > 0.1 mg/l or EC/LC50 > 10.0 mg/l* *If including nano TiO2, must fulfil the conditions expressed in SCCS/1516/13*	**NO CRITERIA (SUNSCREEN PRODUCTS NOT INCLUDED IN THE SCOPE)**	**NO CRITERIA (SUNSCREEN PRODUCTS NOT INCLUDED IN THE SCOPE)** *No chemical UV absorbers can be added to the product*

- It is proposed to include a new requirement in line with Nordic Swan

European Commission

Sub-criterion 3 (g) UV filters

Rationale

- Nordic Swan: UV filters must protect the user only → filter use in products is regulated by Annex VI of Cosmetics Regulation
- Providing stability of organic UV filters in the product is not necessarily compatible with rapid degradability of the substances → "either/or" requirement for biodegradability/toxicity
- 4-methylbenzylidene camphor (4-MBC, used as a chemical organic filter, possibly having endocrine disrupting properties) is therefore excluded
- Thresholds aligned with recently voted EU Ecolabel products (i.e. BCF<100 and logKow<3)

Titanium dioxide (TiO_2)

- Very widely used as UV filter
- Allowed in concentrations up to 25% according to the Cosmetics Regulation

Sub-criterion 3 (g) UV filters

Rationale

nanoTiO$_2$

- Three SCCS opinions on its safe use
- First opinion: safe use up to 25% concentration if following characteristics:
  - Purity >= 99 %;
  - Rutile form, or rutile with up to 5% anatase, with crystalline structure and physical appearance as clusters of spherical, needle, or lanceolate shapes;
  - Median particle size based on number size distribution of 30 to 100 nm;
  - Aspect ratio from 1.0 and up to 4.5, and volume specific surface area up to 460 m2/cm3;
  - Coated with one of the coating materials described in Table 1 of the SCCS/1516/13 opinion, the coatings being stable in the final formulation and during use;
  - Photostable in the final formulation;
  - Up to 10% photocatalytic activity compared to corresponding non-coated or non-doped reference.

European Commission

Sub-criterion 3 (g) UV filters

Rationale

nanoTiO$_2$

- Second opinion: safe use in products intended for application on the skin if coated with:
  - silica and cetyl phosphate (up to 16% and 6% respectively);
  - alumina and manganese dioxide (up to 7% and 0.7% respectively);
  - alumina and triethoxycaprylylsilane (up to 3% and 9% respectively).

  Does not apply to applications that might lead to exposure of the consumer's lungs to the TiO2 nanoparticles through the inhalation route (such as powders or sprayable products)
- Third opinion: safety of the use of nano-TiO_2 in spray applications with respect to exposure of the consumer's lungs cannot be assessed because of insufficient information provided

European Commission

Sub-criterion 3 (g) UV filters

Rationale

nanoTiO$_2$

- 14th ATP to CLP Regulation → *TiO$_2$ placed on the market in powder form and consisting of 1% or more of particles with an aerodynamic diameter <= 10µm* needs to be classified as Carc.2
- For mixtures, *only mixtures placed on the market in powder form and containing 1% or more of TiO$_2$ which is in the form of or incorporated in particles with aerodynamic diameter <= 10µm* need to be classified as Carc.2., i.e. liquid and solid mixtures containing such TiO$_2$ do not need to be classified (but they do need to carry a warning statement)
- Expected to be published early 2020, with the changes becoming a legal requirement 18 months later
- TiO$_2$ (as defined above) would be automatically excluded in EU Ecolabel products according to criterion 3 (c)???

European Commission

Criterion 3 (g): UV filters

Questions and comments?

Points for discussion

- **Is the proposed bioaccumulation limit too stringent for UV filters?**
- **In what form (powder, liquid, etc.) TiO_2 is added to the cosmetic formulation?**
- **Other nanofilters to be regulated? E.g. zinc dioxide…**

Agenda

- Political objectives of the EU Ecolabel and process description
- Summary of the preliminary report : Focus on revised scope
- Criterion 1. Toxicity to aquatic organisms: Critical Dilution Volume (CDV)
- Criterion 2. Biodegradability
- **Criterion 3. Excluded or limited substances and mixtures**
- **Criterion 4. Packaging**
- Criterion 5. Renewable ingredients
- **Criterion 6. Fitness for use**
- Criterion 7. Information on the EU Ecolabel
- Conclusion, next steps and closure of the workshop

European Commission

Main aim of this criterion

Ensures the prevention of spillage during use, promotes the recyclability of the package and minimizes the use of plastics, in line with the objectives of a circular economy

Current criterion	Proposed revised criterion
(a) Primary packaging	(a) Primary packaging
(b) Packaging Impact Ratio (PIR)	(b) Packaging Impact Ratio (PIR)
(c) Design of primary packaging	(c) Design of primary packaging
(d) Design for recycling of plastic packaging	(d) Design for recycling of plastic packaging
	(e) Take-back system

New requirement

Joint Research Centre

Current criterion 4 (a): Primary packaging

European Commission

Existing criterion 4: Packaging
a) Primary packaging Primary packaging shall be in direct contact with the contents. No additional packaging for the product as it is sold, e.g. carton over a bottle, is allowed, with the exception of secondary packaging which groups two or more products together (e.g. the product and refill). *Assessment and verification:* the applicant shall provide a signed declaration of compliance.

Joint Research Centre

European Commission

Criterion 4 (a) – Primary packaging

Rationale

- The criterion is considered adequate
- Only 6% of respondents do not consider it strict enough
- **Proposals to improve the criterion include:**
  - **request that refills should always be provided by the license holders;**
  - **prohibition of small bottles.**

Revised criterion 4 (a): Primary packaging

First proposal for criterion 4: Packaging
a) Primary packaging Primary packaging shall be in direct contact with the contents. No additional packaging for the product as it is sold, e.g. cardboard over a bottle, is allowed, with the exception of secondary packaging which groups two or more products together (e.g. the product and refill). *Assessment and verification:* the applicant shall provide a signed declaration and relevant evidence (e.g. pictures of the product as marketed).

Changes introduced

- **Additional verification is requested**

European Commission

Criterion 4 (a): Primary packaging

Questions and comments?

Points for discussion

- Views on a possible inclusion of a requirement on mandatory provision of refill bottles for some cosmetics (e.g. shampoos, shower gels, etc.)

Joint Research Centre

Current criterion 4 (b): Packaging Impact Ratio

(b) Packaging Impact Ratio (PIR)

The Packaging Impact Ratio (PIR) must be less than 0,28 g of packaging per gram of product for each of the packaging in which the product is sold. Pre-shaving products packed in metal aerosol containers are exempted from this requirement. PIR shall be calculated (separately for each of the packaging) as follows:

$$PIR = (W + (Wrefill \times F) + N + (Nrefill \times F))/(D + (Drefill \times F))$$

Where:

W —weight of packaging (primary + proportion of secondary (1), including labels)(g)

Wrefill —weight of refill packaging (primary + proportion of secondary (1), including labels) (g)

N —weight of non-renewable + non-recycled packaging (primary + proportion of secondary (1), including labels) (g)

Nrefill —weight of non-renewable and non-recycled refill packaging (primary + proportion of secondary (1), including labels) (g)

D —weight of product contained in the 'parent' pack (g) Drefill —weight of product delivered by the refill (g)

F —number of refills required to meet the total refillable quantity, calculated as follows:

$$F = V \times R/Vrefill$$

Where;

V —volume capacity of the parent pack (ml)

Vrefill —volume capacity of the refill pack (ml)

R —the refillable quantity. This is the number of times that the parent pack can be refilled. Where F is not a whole number it should be rounded up to the next whole number.

In case no refill is offered PIR shall be calculated as follows:

$$PIR = (W + N)/D$$

The manufacturer shall provide the number of foreseen refillings, or use the default values of R = 5 for plastics and R = 2 for cardboard.

Assessment and verification: the applicant shall provide the calculation of the PIR of the product. A spreadsheet for this calculation is available on the EU Ecolabel website. If the product is sold in different packaging (i.e. with different volumes), the calculation shall be submitted for each packaging size for which the EU Ecolabel shall be awarded. The applicant shall provide a signed declaration for the content of post-consumer recycled material or material from renewable origin in the packaging and a description of the refill system offered, if applicable (kinds of refills, volume). For approval of refill packaging, the applicant or retailer shall document that the refills shall be available for purchase on the market.

European Commission

Criterion 4 (b) – Packaging Impact Ratio

Rationale

- Considers the quantity of *renewable* and *recycled* materials in the packaging (primary + secondary) and whether the product is *refillable*
- 24% of respondents consider the PIR difficult to calculate and/or the requirement of PIR=0.28 g of packaging per gram of product difficult to achieve (62% of them from industry):
  - Data to calculate the PIR are difficult to obtain, since the suppliers are not able to provide the information
  - Products which require packaging with heavy closing systems (e.g. foam pumps) are not able to comply with the current requirement
  - Small packaging (e.g. samples) has more difficulties to comply with the criterion, and an exemption should be included
- 46% of the stakeholders used the spreadsheet available on the EU Ecolabel website and 87% of them found it easy to use

Criterion 4 (b) – Packaging Impact Ratio

Rationale

- Information from Competent Bodies:
  - PIR values range from 0,019g to 0,280g (**maximum allowed)**
  - 33% of the packaging for which data have been received contain recycled or renewable materials. The percentage of recycled or renewable materials range from the 18% to 99%
  - 11% of the products can be refilled

- Reduction of the PIR is not considered appropriate at this stage

Revised criterion 4 (b): Packaging Impact Ratio

First proposal for criterion 4: Packaging

(b) Packaging Impact Ratio (PIR)

The Packaging Impact Ratio (PIR) must be less than 0,28 g of packaging per gram of product for each of the packaging in which the product is sold. Products packed in metal aerosol containers are exempted from this requirement. PIR shall be calculated (separately for each of the packaging) as follows:

$$PIR = (W + (W_{refill} \times F) + N + (N_{refill} \times F))/(D + (D_{refill} \times F))$$

Where:

W —weight of packaging (primary + proportion of secondary (1), including labels)(g)

W_{refill} —weight of refill packaging (primary + proportion of secondary (1), including labels) (g)

N —weight of non-renewable + non-recycled packaging (primary + proportion of secondary (1), including labels) (g)

N_{refill} —weight of non-renewable and non-recycled refill packaging (primary + proportion of secondary (1), including labels) (g)

D —weight of product contained in the 'parent' pack (g) D_{refill} —weight of product delivered by the refill (g)

F —number of refills required to meet the total refillable quantity, calculated as follows:

$$F = V \times R/Vrefill$$

Where;

V —volume capacity of the parent pack (ml)

V_{refill} —volume capacity of the refill pack (ml)

R —the refillable quantity. This is the number of times that the parent pack can be refilled. Where F is not a whole number it should be rounded up to the next whole number.

In case no refill is offered PIR shall be calculated as follows:

$$PIR = (W + N)/D$$

The manufacturer shall provide the number of foreseen refillings, or use the default values of R = 5 for plastics and R = 2 for cardboard.

(1) Proportional weight of the grouping packaging (e.g. 50 % of the total grouping packaging weight, if two products are sold together).

Changes introduced

- **No changes have been introduced so far**

Criterion 4 (b): Packaging Impact Ratio

Questions and comments?

Points for discussion

- Data on PIR values are needed, shall revision of the threshold was considered appropriate

Current criterion 4 (c): Design of primary packaging

European Commission

c) Design of primary packaging

The primary packaging shall be designed to make correct dosage easy (e.g. by ensuring that the opening at the top is not too wide) and to ensure that at least 90 % of the product can be removed easily from the container. The residual amount of the product in the container (R), which must be below 10 %, shall be calculated as follows:

$$R = ((m2 - m3)/(m1 - m3)) \times 100\ (\%)$$

Where:

m1 —Primary packaging and product (g)

m2 —Primary packaging and product residue in normal conditions of use (g)

m3 —Primary packaging emptied and cleaned (g)

Assessment and verification: the applicant shall submit a description of the dosage device and test report with results of measuring the residual quantity of a rinse-off cosmetic product in the packaging. The test procedure for measuring the residual quantity is described in the user manual available on the EU Ecolabel website.

European Commission

Criterion 4 (c) – Design of primary packaging

Rationale

- 20% of respondents consider the current requirement difficult to achieve
- One respondent said the residual quantity of a rinse-off cosmetic product in the packaging depends not only on the dosage system, but also on the material and the viscosity of the product
- Products sold in bottles of lower capacity may have problems to achieve the requirement of 10%.
- CBs could not provide information on the residual amount of product in the primary packaging for all the licensed products. The maximum reported residual amount of product remaining in the container is 7,8%

Revised criterion 4 (c): Design of primary packaging

First proposal for criterion 4: Packaging

c) Design of primary packaging

The primary packaging shall be designed to make correct dosage easy* (e.g. by ensuring that the opening at the top is not too wide) and to ensure that at least 90 % of the product can be easily removed from the container. The residual amount of the product in the container (R), which must be below 10%, shall be calculated as follows:

$$R = ((m2 - m3)/(m1 - m3)) \times 100 \ (\%)$$

Where:

m1 —Primary packaging and product (g)

m2 —Primary packaging and product residue in normal conditions of use (g)

m3 —Primary packaging emptied and cleaned (g)

*For liquid hand soap no pump or dispenser sold with the product may provide more than 2 g soap per full press.

Assessment and verification: the applicant shall submit a description of the dosage device (e.g. schematic illustration, pictures…) and test report with results of measuring the residual quantity of a rinse-off cosmetic product in the packaging. The test procedure for measuring the residual quantity is described in the user manual available on the EU Ecolabel website.

Changes introduced

- **Specific requirement for liquid hand soap dispenser aligned with Nordic Swan**
- **Additional guidance for the assessment and verification method**

European Commission

Criterion 4 (c): Design of primary packaging

Questions and comments?

Current crit. 4 (d): Design for recycling of plastic packaging

(d) Design for recycling of plastic packaging

Plastic packaging shall be designed to facilitate effective recycling by avoiding potential contaminants and incompatible materials that are known to impede separation or reprocessing or to reduce the quality of recyclate. The label or sleeve, closure and, where applicable, barrier coatings shall not comprise, either singularly or in combination the materials and components listed in Table 5.

Table 5

Materials and components excluded from packaging elements

Packaging element	Excluded material or component*
Label or sleeve	- PS label or sleeve in combination with a PET, PP or HDPE bottle - PVC label or sleeve in combination with a PET, PP or HDPE bottle - PETG label or sleeve in combination with a PET bottle - Sleeves made of different polymer than the bottle - Labels or sleeves that are metallised or are welded to a packaging body (in mould labelling)
Closure	- PS closure in combination a with a PET, PP or HDPE bottle PVC closure in combination with a PET, PP or HDPE bottle PETG closures and/or closure material with density of above 1 g/cm3 in combination with a PET bottle - Closures made of metal, glass, EVA - Closures made of silicone. Exempted are silicone closures with a density < 1 g/cm3 in combination with a PET bottle and silicone closures with a density > 1g/cm3 in combination with PP or HDPE bottle - Metallic foils or seals which remain fixed to the bottle or its closure after the product has been opened
Barrier coatings	- Polyamide, EVOH, functional polyolefins, metallised and light blocking barriers

(*) EVA — Ethylene Vinyl Acetate, EVOH — Ethylene vinyl alcohol, HDPE — High-density polyethylene, PET — Polyethylene terephtalate, PETG — Polyethylene terephthalate glycol-modified, PP — Polypropylene, PS — Polystyrene, PVC — Polyvinylchloride,

Pumps and aerosol containers are exempted from this requirement.

European Commission

Criterion 4 (d) – Design for recycling of plastic packaging

Rationale

- Recyclability of waste packaging is of high importance to minimize the impact coming from new materials (packaging accounted *between 5 to 10% of total impacts* for most of the products covered, 30% for toothpaste)
- Recycling rates in EU are generally higher for paper and cardboard packaging waste than for plastic packaging waste
- Plastic as the main packaging material for cosmetic products
- Labels (e.g. aluminized paper or plastic) are essential elements of packaging fixed using different kinds of adhesives
- Current requirement is based on studies conducted by the French Comité Technique pour le Recyclage des Emballages Plastiques (COTREP) and Waste Resource Action Programme (WRAP)
- 44% of the respondents consider existing criterion clear enough
- Some requested to update and make clearer the list of materials

Revised criterion 4 (d): Design for recycling of plastic packaging

European Commission

First proposal for criterion 4: Packaging

(d) Design for recycling of plastic packaging

Plastic packaging shall be designed to facilitate effective recycling by avoiding potential contaminants and incompatible materials that are known to impede separation or reprocessing or to reduce the quality of recyclate. The label or sleeve, closure and, where applicable, barrier coatings shall not comprise, either singularly or in combination the materials and components listed in Table 5.

Table 5 Materials and components excluded from packaging elements

Packaging element	Excluded material or component*
Label or sleeve	- PS label or sleeve in combination with a PET, PP or HDPE bottle - PVC label or sleeve in combination with a PET, PP or HDPE bottle - PETG or PETC label or sleeve in combination with a PET bottle - Sleeves made of different polymer than the bottle - Labels or sleeves that are metallised or are welded to a packaging body (in mould labelling)
Closure	- PS closure in combination a with a PET, PP or HDPE bottle PVC closure in combination with a PET, PP or HDPE bottle PETG closures and/or closure material with density of above 1 g/cm3 in combination with a PET bottle - Closures made of metal, glass, EVA - Closures made of silicone. Exempted are silicone closures with a density < 1 g/cm3 in combination with a PET bottle and silicone closures with a density > 1g/cm3 in combination with PP or HDPE bottle - Metallic foils or seals which remain fixed to the bottle or its closure after the product has been opened
Barrier coatings	- Polyamide, EVOH, functional polyolefins, metallised and light blocking barriers

Pumps and aerosol containers are exempted from this requirement.

Assessment and verification: the applicant shall submit a signed declaration of compliance specifying the material

Criterion 4 (d) – Design for recycling of plastic packaging

Changes introduced

- Inclusion of crystalline polyethylene terephthalate (PETC) in the materials used in labels or sleeves that should be avoided in combination with a PET bottle (in line with Blue Angel requirement)

Criterion 4 (d): Design for recycling of plastic packaging

Questions and comments?

Points for discussion

- New data/studies on materials to be considered in the update of the table?

New criterion 4 (e): Take back system

New requirement

First proposal for criterion 4: Packaging
(e) Take-back system Applicant shall offer a take back service to their retailers in order to collect empty products from consumers Assessment and verification: the applicant shall submit a description of the service conditions and a declaration of compliance.

European Commission

Criterion 4 (e) – Take back system

Rationale

- Increasing awareness of citizens
- Many companies are going in this direction, e.g. L'Oreal, Henkel, Unilever, MAC Cosmetics, Farfalla, Ringana
- Products can be returned to selected shops and the empties are recycled in a separate manner (higher purity)

European Commission

Criterion 4 (e): Take-back system

Questions and comments?

Points for discussion

- Does this proposal have the interest of stakeholders?

Agenda

- Political objectives of the EU Ecolabel and process description
- Summary of the preliminary report : Focus on revised scope
- Criterion 1. Toxicity to aquatic organisms: Critical Dilution Volume (CDV)
- **Criterion 2. Biodegradability**
- Criterion 3. Excluded or limited substances and mixtures
- Criterion 4. Packaging
- **Criterion 5. Renewable ingredients**
- Criterion 6. Fitness for use
- Criterion 7. Information on the EU Ecolabel
- Conclusion, next steps and closure of the workshop

European Commission

Criterion 5: Renewable ingredients

Main aim of this criterion

Ensure that the sourcing of renewable ingredients does not affect biodiversity, soil fertility, land use change, organic carbon stock, nutrient equilibrium

Current criterion	Proposed revised criterion
Sustainable sourcing of palm oil, palm kernel oil and their derivatives	(a) Sustainable sourcing of palm oil, palm kernel oil and their derivatives
	(b) Certification of plant based ingredients

New requirement

Joint Research Centre

European Commission

Criterion 5: Renewable ingredients

Existing criterion 5: Sustainable sourcing of palm oil, palm kernel oil and their derivatives
Palm oil and palm kernel oil and their derivatives used in the product must be sourced from plantations that meet criteria for sustainable management that have been developed by multi-stakeholder organisations that have a broad- based membership including NGOs, industry and government. *Assessment and verification:* the applicant shall provide third-party certifications that the palm oil and palm kernel oil used in the manufacturing of the product originates from sustainably managed plantations. Certifications accepted shall include RSPO (by identity preserved, segregated or mass balance) or any equivalent scheme based on multi-stakeholder sustainable management criteria. For chemical derivatives of palm oil and palm kernel oil ([53]), it is acceptable to demonstrate sustainability through book and claim systems such as GreenPalm or equivalent.

European Commission

Criterion 5: Renewable ingredients

5 (a) Sustainable sourcing of palm oil, palm kernel oil and their derivatives

Rationale

- Vegetable oils environmental advantages because renewable, biodegradable, lower toxicity
- Concern with respect to conservation of habitat biodiversity, exploitation of forests and use of chemical fertilizers has been increasing
- Many vegetable oils are used but palm oil is associated with highest yields
- 11% EU ecolabelled products contain palm or palm kernel oils and 93.5% contain derivatives of palm oil or palm kernel oil
- Unfortunately it is also associated with deforestation, land use change and loss of natural habitat

European Commission

Criterion 5: Renewable ingredients

5 (a) Sustainable sourcing of palm oil, palm kernel oil and their derivatives

Rationale

- The manufacture of products involves more than one stakeholder → **tracing** ingredients is difficult → certification schemes
- Many voluntary sustainability certification schemes but **RSPO** largest multi-stakeholder certification scheme available
- 22% respondents are in favor of extending the criterion to **other raw materials**
- Lack of data and absence of mature certification schemes → unfeasibility to set a prescriptive EU Ecolabel requirement
- Other certification schemes set the same criterion

European Commission

Criterion 5: Renewable ingredients

5 (a) Sustainable sourcing of palm oil, palm kernel oil and their derivatives

Rationale of proposed assessment and verification

- 60% respondents support the existing assessment
- 24% respondents consider it difficult to check the proofs to guarantee the sustainable origin of the raw material
- It was suggested to remove the Book and Claims system as a verification method

Criterion 5: Renewable ingredients

First proposal for criterion 5: Renewable ingredients

(a) Sustainable sourcing of palm oil, palm kernel oil and their derivatives

In the specific case of renewable ingredients from palm oil or palm kernel oil, or derived from palm oil or palm kernel oil, 100% w/w of the renewable ingredients used shall meet the requirements for sustainable production of a certification scheme that is a multi-stakeholder organisation with a broad membership, including NGOs, industry and government and that addresses environmental impacts on soil, biodiversity, organic carbon stocks and conservation of natural resources.

Assessment and verification

To demonstrate compliance with sub-criterion (a) evidence through third-party chain of custody certificating that the input materials used in the manufacturing originate from sustainably managed plantations shall be provided. Roundtable for Sustainable Palm Oil (RSPO) certificates or certificates of any equivalent or stricter sustainable production scheme demonstrating compliance to any of the following models: identity preserved, segregated, mass balance shall be accepted. For palm oil and palm kernel oil derivatives, the amounts of RSPO credits purchased and claimed in the RSPO PalmTrace system model during the most recent annual trading period shall be provided to demonstrate compliance to the Book and Claim supply chain model.

WORK IN PROGRESS

European Commission

Criterion 5: Renewable ingredients

5 (a) Sustainable sourcing of palm oil, palm kernel oil and their derivatives

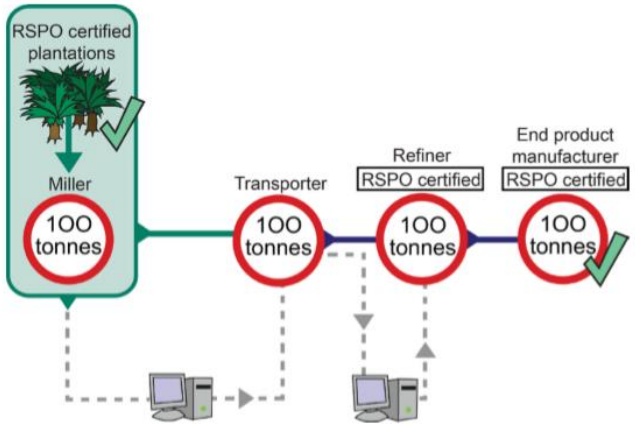
Changes introduced

- **100% of ingredients sourced from plantations must meet criteria for sustainable management**
- **Book and Claims system was maintained but the amounts of RSPO credits purchased and claimed in the RSPO PalmTrace system model during the most recent annual trading period shall be provided**
- **More clarity in the text and harmonization with other products**

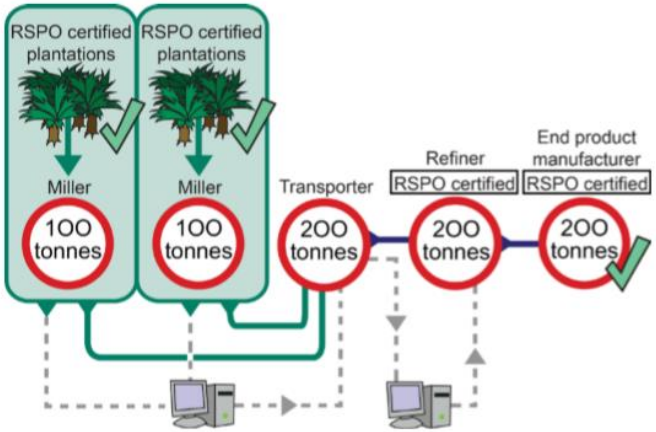
Criterion 5: Renewable ingredients

RSPO certified supply chain systems

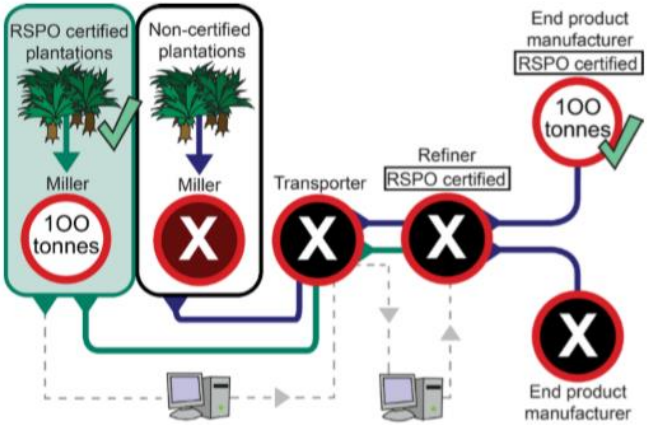
Identity preserved



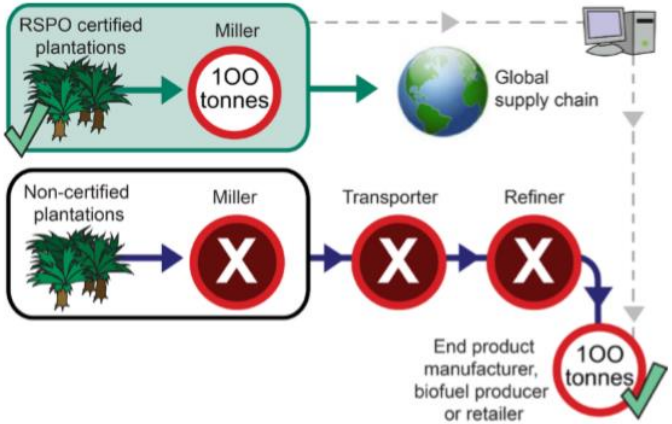
Segregation



Mass balance



Book and claim



Criterion 5: Renewable ingredients

Questions and comments?

Points for discussion

- **Alternative certification schemes apart from RSPO?**
- **RSPO certifies primary forests but secondary, disturbed or regenerating forests are left unprotected. Peatland are given limited protection. "RSPO certified" does not necessarily mean "deforestation free"**
- **Deforestation-free certification schemes?**
- **Certification schemes for other vegetable oils?**

European Commission

Criterion 5: Renewable ingredients

5 (b) Certification of plant based ingredients

New requirement

(b) Certification of plant based ingredients

In the specific case of ingredients covered by the scope of the EU organic Regulation (EC 834/2007), X% w/w of the ingredients used shall be produced according to organic production and certified by a third-party.

Assessment and verification

To demonstrate compliance with sub-criterion (b), the applicant shall provide third-party certifications for the ingredients covered by the scope of the EU Organic Regulation. Certifications accepted shall include those awarded by Competent Bodies appointed through the EU Regulation on organic production 834/2007, as well as IFOAM family of standards, COSMOS, or any equivalent scheme.

European Commission

Criterion 5: Renewable ingredients

5 (b) Certification of plant based ingredients

Rationale

- **Organic cultivation focuses on soil fertility management, crop variation, responsible use of energy, materials and waste, excluding the use of OGMs and limiting the input of chemicals**
- **EU Organic Regulation focuses on ingredients used as feed and food and, in the new expansion of the scope, on ingredients that are used also in the cosmetic sector**
- **Other labelling schemes include requirement on organic ingredients in the ecolabelled products**
- **Market trends indicate the direction of the cosmetic sector towards conscious sourcing of ingredients**

Criterion 5: Renewable ingredients

5 (b) Certification of plant based ingredients

Rationale

Available certification schemes:

- **Eco-cert: *Organic Cosmetics* (leave-on products: min 20%, rinse-off products: min 10% from organic farming) and *Natural Cosmetics* (5% from organic farming)**
- **Natrue: 95% of natural substances from organic farming/wild collection**
- **IFOAM: set of standards to assess quality and equivalency of organic standards and regulations**
- **COSMOS: harmonizes various certifications and labels incl. Soils Association (UK), Ecocert (France), Cosmebio (France), BDIH (Germany), AIAB/ICEA (Italy). Distinction between *certified ingredients* and *approved raw materials***

European Commission

Criterion 5: Renewable ingredients

5 (b) Certification of plant based ingredients

Rationale

Other ecolabelling schemes

Nordic Swan	Blue Angel	Bra Miljöval
If it is stated on the product that the product is/contains organic ingredients, at least one of the following must be complied with for these raw materials: *• The EU Regulation on organic production 834/2007.* *• Organically certified under NOP* *• Organically certified under NPOP* *• Organically certified under a system approved by IFOAM* *This is stated, for example, with an asterisk following the substance on the INCI list and with the following text: "Organic under EU 889/2008/NOP/NPOP/xx"*	NO CRITERION	NO CRITERION

European Commission

Criterion 5: Renewable ingredients

5 (b) Certification of plant based ingredients

It is proposed to request that EU Ecolabel products shall contain a minimum content of organic certified ingredients when plant based ingredients (covered by the EU Organic Regulation) are used

- ***In the specific case of ingredients covered by the scope of the EU organic regulation, X% w/w of the ingredients used shall be produced according to organic production and certified by a third-party***

Minimum content requests to be submitted

Joint Research Centre

European Commission

Criterion 5: Renewable ingredients

5 (b) Certification of plant based ingredients

Rationale of proposed assessment and verification

- **A proof of the organic certification awarded by Competent Bodies, IFOAM, COSMOS or equivalent**

Criterion 5: Renewable ingredients

Questions and comments?

Points for discussion

- Opinion on the newly proposed requirement 3 (b)
- **Indirect effects** of the newly proposed requirement 3 (b): would it push the ingredient formulation towards ***less natural products*** in order to avoid additional certifications?
- How big is the share of the industry that already uses organically certified products?
- What certification schemes are currently used?
- Opinion on the **title of the criterion**

Agenda

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European Commission

Criterion 6: Fitness for use

Main aim of this criterion

Ensure the quality/efficacy of the product in fulfilling its primary function and any secondary functions claimed

Current criterion	Proposed revised criterion
Fitness for use	Fitness for use

European Commission

Criterion 6: Fitness for use

Existing criterion 6: Fitness for use
The product's capacity to fulfil its primary function (e.g. cleaning, conditioning) and any secondary functions claimed (e.g. anti-dandruff, colour protection) shall be demonstrated either through laboratory test(s) or a consumer test. The tests shall be conducted following the 'Guidelines for the Evaluation of the Efficacy of Cosmetic Products'(12) and the instructions given in the user manual available on the EU Ecolabel website. Assessment and verification: the applicant shall document the test protocol that has been followed in order to test the product's efficacy. Applicants shall present results from this protocol that demonstrate that the product fulfils the primary and secondary functions claimed on the product label or packaging. [References: (12) Available at: https://www.cosmeticseurope.eu/publications-cosmetics-europe-association/guidelines.html?view=item&id=23 and the EU Ecolabel website.]

European Commission

Criterion 6: Fitness for use

Rationale

- **Use phase represents up to 50% of total environmental impacts, depending on the product and the impact category**
- **Some characteristics of the products such as the ease for being rinsed off or long lasting results can help reduce impacts (e.g. amount of water used)**
- **Quality of the product is of high relevance to prevent the idea that EU Ecolabel products are environmentally friendlier but *inefficient***
- **Performance tests should address all important characteristics and functions of the products**

European Commission

Criterion 6: Fitness for use

Rationale

- **It is required to demonstrate the primary and any secondary functions claimed**
- **Best-practice verification criteria include legal compliance, truthfulness, evidential support, honesty, fairness and informed decision making**
- **General principles for efficacy tests (*testing requirements* or test protocols) and info in test reports (*documentation requirements*) available in "Guidelines for the evaluation of the efficacy of Cosmetic Products" and "Technical document for cosmetic claims"**

European Commission

Criterion 6: Fitness for use

Rationale

- Tests used can adopt the ***sensorial approach*** (user tests) by consumers or experts or the ***instrumental approach*** (in vivo, ex-vivo or in vitro) which does not reproduce normal conditions but allows objective analysis of specific activities
- No harmonized tests are available for specific product groups → **user tests** (***blind use tests*** or ***concept use tests***)
- EU Ecolabel requirement: **min 10** participants; comparison with a reference market-leading product; **min 80%** of satisfied consumers
- The criterion is considered adequate by 55% of respondents but criterion is perceived as **subjective** and the 80% score **difficult to achieve**

European Commission

Criterion 6: Fitness for use

Rationale

- **Other certification schemes have the same criterion as EU Ecolabel**
- **Nordic Swan allows the use of sales in the last 3 years as documentation of the primary functions**

Nordic Swan	Blue Angel	Bra Miljöval
SAME CRITERION AS EU ECOLABEL *For existing products that have been on the market for at least 3 years, sales figures can be used as documentation of the primary function. Sales must be increasing or stable to be used as documentation for the primary performance/quality*	**SAME CRITERION AS EU ECOLABEL**	**NO CRITERION**
Sunscreen *The labelling of sunscreen products with information text and SPF factor are to follow Commission Recommendation 2006/647/EC on the efficacy of sunscreen products and the claims made relating thereto*		

European Commission

Criterion 6: Fitness for use

Rationale of the assessment and verification method

- **The applicant shall provide results from the testing and document the test protocol that has been followed**
- **10% of respondents disagree with the verification method, mainly because of confidentiality reasons**
- **52% of respondents agree with the verification method**
- **Improvements include: the use of a generic formulation as a comparison product and the use of a standard procedure**

European Commission

Criterion 6: Fitness for use

First proposal for criterion 6: Fitness for use
The product's capacity to fulfil its primary function (e.g. cleaning, conditioning) and any secondary functions claimed (e.g. anti-dandruff, colour protection) shall be demonstrated either through laboratory test(s) or a consumer test. The tests shall be conducted following the 'Guidelines for the Evaluation of the Efficacy of Cosmetic Products'(*) and the instructions given in the user manual available on the EU Ecolabel website. Assessment and verification: The applicant shall document the test protocol that has been followed in order to test the product's efficacy. Applicants shall present results from this protocol that demonstrate that the product fulfils the primary and secondary functions claimed on the product label or packaging. [References: (*) Available at: https://www.cosmeticseurope.eu/publications-cosmetics-europe-association/guidelines.html?view=item&id=23 and the EU Ecolabel website.]

DRAFT

European Commission

Criterion 6: Fitness for use

Questions and comments?

Points for discussion

- **Information on testing protocols and methodologies for general and specific cosmetic products are requested**
- **Proposal for improvement of the criterion**

Agenda

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European Commission

Criterion 7: Information appearing on the EU Ecolabel

Main aim of this criterion

Communication of the three key environmental characteristics of the EU Ecolabel

Current criterion	Proposed revised criterion
Information appearing on the EU Ecolabel	Information appearing on the EU Ecolabel

European Commission

Criterion 7: Information appearing on the EU Ecolabel

Existing criterion 7: Information appearing on the EU Ecolabel

The optional label with text box shall contain the following text:

— Reduced impact on aquatic ecosystems,

— Fulfils strict biodegradability requirements,

— Limits packaging waste.

The guidelines for the use of the optional label with text box can be found in the 'Guidelines for use of the Ecolabel logo' on the website:

http://ec.europa.eu/environment/ecolabel/documents/logo_guidelines.pdf

Assessment and verification: the applicant shall provide a sample of the product label or an artwork of the packaging where the EU Ecolabel is placed, together with a signed declaration of compliance.

WORKING

European Commission

Criterion 7: Information appearing on the EU Ecolabel

Rationale

- **Informs the consumer on the environmental advantages of the product and makes easy the environmentally friendly decision**
- **The majority of the respondents agree with the current criterion**
- **One stakeholder perceived the voluntary sentences as more suitable for detergent products, and not for cosmetics that focus their communication on beauty**
- **Considerations on the process to get the EU ecolabel**

European Commission

Criterion 7: Information appearing on the EU Ecolabel

First proposal for criterion 7: Information appearing on the EU Ecolabel
The optional label with box shall contain the following information: - Limited impact on aquatic environment - Fulfills strict biodegradability requirements - Limits packaging waste The guidelines for the use of the optional label with text box can be found in the 'Guidelines for use of the Ecolabel logo' on the website: http://ec.europa.eu/environment/ecolabel/documents/logo_guidelines.pdf Assessment and verification: the applicant shall provide a sample of the product

European Commission

Criterion 7: Information appearing on the EU Ecolabel

Questions and comments?

Additional topics

- **The process to get the label is considered *long and complex* by one stakeholder**
- **It was suggested to have a *simpler registration system*, where materials already approved for some products are kept in a database and are automatically considered approved for other products without the need of providing further proof**

Agenda

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- **Conclusion, next steps and closure of the workshop**

European Commission

Remember!

Next steps:

1. Stakeholders can provide **comments** on technical report and criteria proposals **not later than by 3rd January 2020**

2. Comments need to be submitted using the BATIS system.

3. March/April 2020: TR2.0 publication

4. April/May 2020: 2nd AHWG meeting

Joint Research Centre

Thanks for your attention

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