Revision of the EU Ecolabel criteria for
DETERGENT AND CLEANING PRODUCTS
12-13th March 2024

WEBEX SESSION

ETIQUETTE FOR VIRTUAL MEETING PARTICIPANTS

- **Please indicate "NAME OF YOUR ORGANIZATION + YOUR FULL NAME"**
- **MUTE YOUR MIC AND SWITCH OFF you CAMERA (unless you have the floor)**
- **USE THE CHAT only to ask for the FLOOR (write "FLOOR" in the chat), and COMMENT only ORALLY**

EUEL DETERGENTS
1ST AHWG
DAY 1 - 12 MARCH 2024

European Commission

EU Ecolabel Criteria for Detergents product groups

Laundry Detergents	LD
Industrial & Institutional Laundry detergents	IILD
Dishwasher Detergents	DD
Industrial & Institutional Dishwasher detergents	IIDD
Hand Dishwashing Detergents	HDD
Hard Surface Cleaning Products	HSC

1st Ad-hoc Working Group Meeting 12th - 13th March 2024, Virtual meeting



The Joint Research Centre (JRC)

Alfonso Jose Lag-Brotons

Maria Grazia La Placa

European Commission

1. Opening of virtual room, welcome of participants and introductions

European Commission

Agenda

Day 1: Tuesday 12th March 2024

		SCHEDULE
1.	Opening of virtual room, welcome of participants and introductions	09:00 – 09:15
2.	Political objectives of the EU Ecolabel and process description	09:15 – 09:30
3.	Preliminary background (PR) information (e.g. market analysis, LCA screening studies)	09:30 – 10:00
4.	Scope and definitions	10:00 – 11:30
	Break (15 min)	11:30 – 11:45
5.	EU Ecolabel criteria for detergents - Revision of criteria and discussion: Assessment and verification + Reference dosage **+ Criterion: "*Dosage requirements*".**	11:45 – 12:15
6.	EU Ecolabel criteria for detergents - Revision of criteria and discussion: Criterion: **"***Toxicity to aquatic organisms***" +** Criterion: **"***Biodegradability***"**	12:15 – 13:30
	Lunch break (1 hour)	13:30 – 14:30
7.	EU Ecolabel criteria for detergents – Criterion "Sustainable sourcing of raw materials"	14:30 – 15:00
8.	EU Ecolabel criteria for detergents – Criterion "Excluded and **Restricted substances"** [Part 1 of 2; targeting sub-criterions (a), (b), (c) and (d)]	15:00 – 17:00

European Commission

Agenda

Day 2: Wednesday 13th March 2024

		SCHEDULE
1.	Opening of virtual room and welcome and recap of previous day	09:00 – 09:15
2.	EU Ecolabel criteria for detergents – Criterion "Excluded and Restricted substances" [Part 2 of 2; targeting sub-criterions (e), (f), (g) and (h)]	09:15 – 10:45
	Break (15 min)	10:45 – 11:00
3.	EU Ecolabel criteria for detergents – Criterion **"Packaging"** [Part 1 of 2; (New) Recycled material content and WUR]	11:00 – 11:45
4.	EU Ecolabel criteria for detergents – Criterion "Packaging" [Part 2 of 2; Design for Recycling; Products sold in spray bottles; Packaging take back system]	11:45 – 12:30
	Lunch break (1 hour)	12:30 – 13:30
5.	EU Ecolabel criteria for detergents – Criterions "Fitness for use"; "Automatic dosing system" and "User information"	13:30 – 14:00
6.	Conclusion, next steps and closure of the meeting	14:00 – 14:30

European Commission

1. The Joint Research Centre (JRC)

As the science and knowledge service of the European Commission our mission is to support EU policies with independent evidence throughout the whole policy cycle.

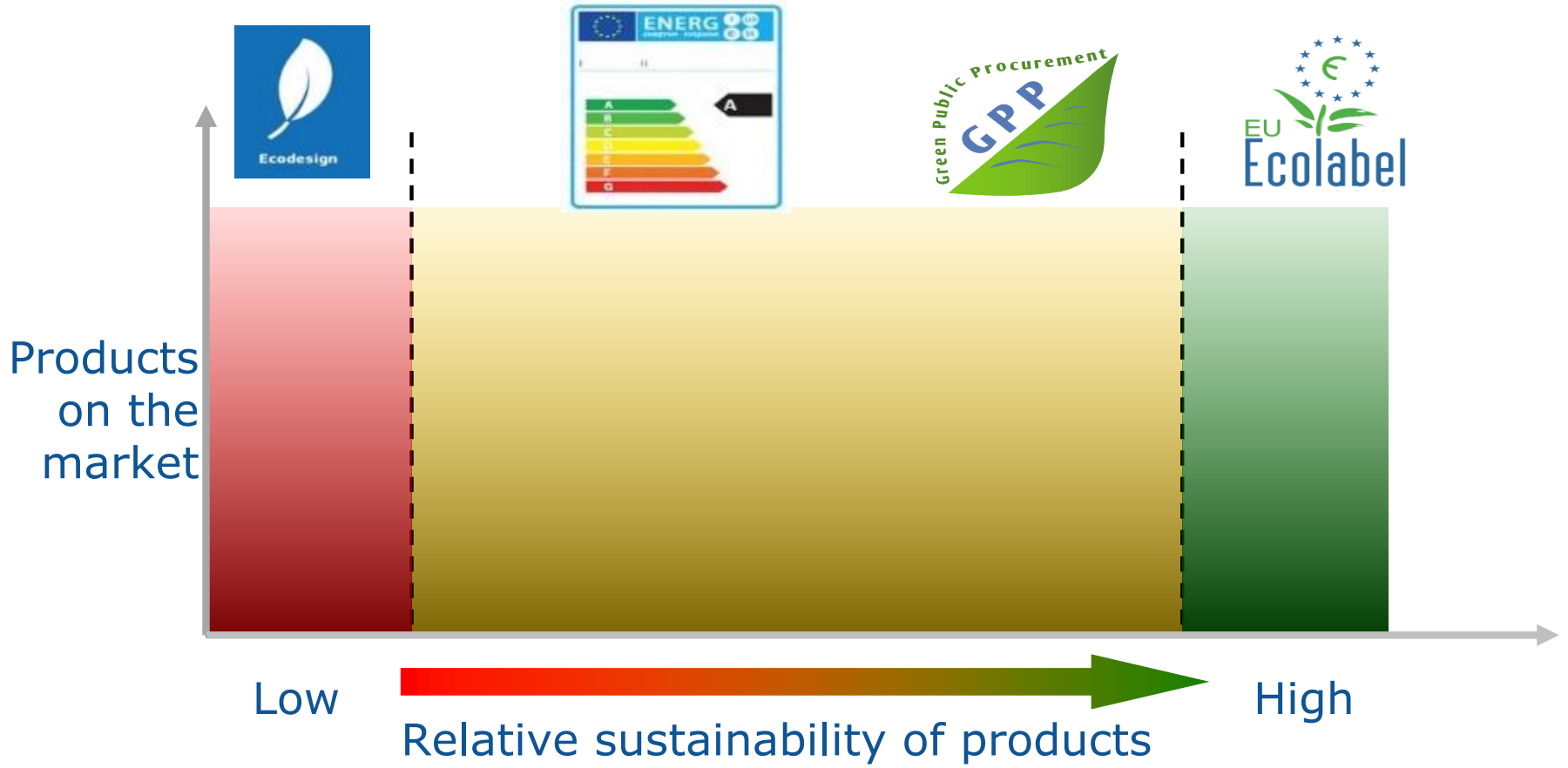
European Commission

1. Circular Economy and sustainable industry (B5) Policy tools

Cut out least sustainable products

Incentivise choice of higher sustainability products

Encourage development of new, more sustainable products



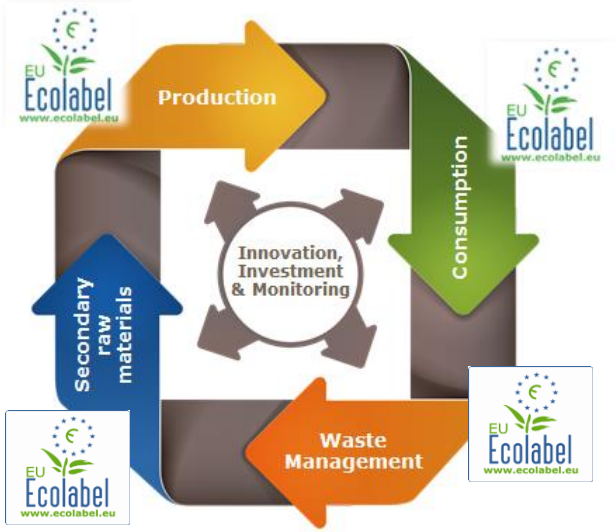
European Commission

2. Political objectives of the EU Ecolabel and process description

European Commission

2. The EU Ecolabel (EUEL)

- The official European Union voluntary label for environmental excellence
- Established in 1992- Regulation (EC) 66/2010
- Managed by the European Commission and the Member States
- The only EU-wide ISO 14024 Type 1 Ecolabel: reliable; multi-criteria; life-cycle approach; open-transparent-multi-stakeholder and science-based




Raw materials


Minimising emissions


Design for recycling


Resources saving


Hazardous substances restriction


Waste reduction


Verified performance

European Commission

Benefits to applicants

- Certifies that product/service is **among the most environmentally-friendly in its class**
- Increases the **visibility of the product** on the market via/by benefitting from:
  - **EU Ecolabel logo,** which is recognized across Europe by millions of consumers.
  - **EU Ecolabel official catalogue http://ec.europa.eu/ecat/,** featuring products and the company.
  - **Marketing activities,** by the EC and the National Competent Bodies (e.g. online retailers collaboration)

- Contributes to **resource and monetary savings,** whilst improve the **image and growth of the company**
- **Potential** compliance and compatibility with Green Deal Legislation (e.g.GCD, ESPR)
- Easier access to Green Public Procurement (GPP)

Further information at https://environment.ec.europa.eu/topics/circular-economy/eu-ecolabel-home/product-groups-and-criteria_en or contacting helpdesk-eu-ecolabel@adelphi.de

European Commission

2. The EUEL criteria under revision

Commission Decisions establishing the EU Ecolabel criteria for detergents - notified under documents:

- Hand dishwashing detergents (HDD) C(2017) 4227 [OJ L 180, 12.7.2017, p. 1–15]

- Hard surface cleaning products (HSC) C(2017) 4241 [OJ L 180, 12.7.2017, p. 45–62]

- Dishwasher detergents (DD) C(2017) 4240 [OJ L 180, 12.7.2017, p. 31–44]

- Industrial and institutional dishwasher detergents (IIDD) C(2017) 4228 [OJ L 180, 12.7.2017, p. 16–30]

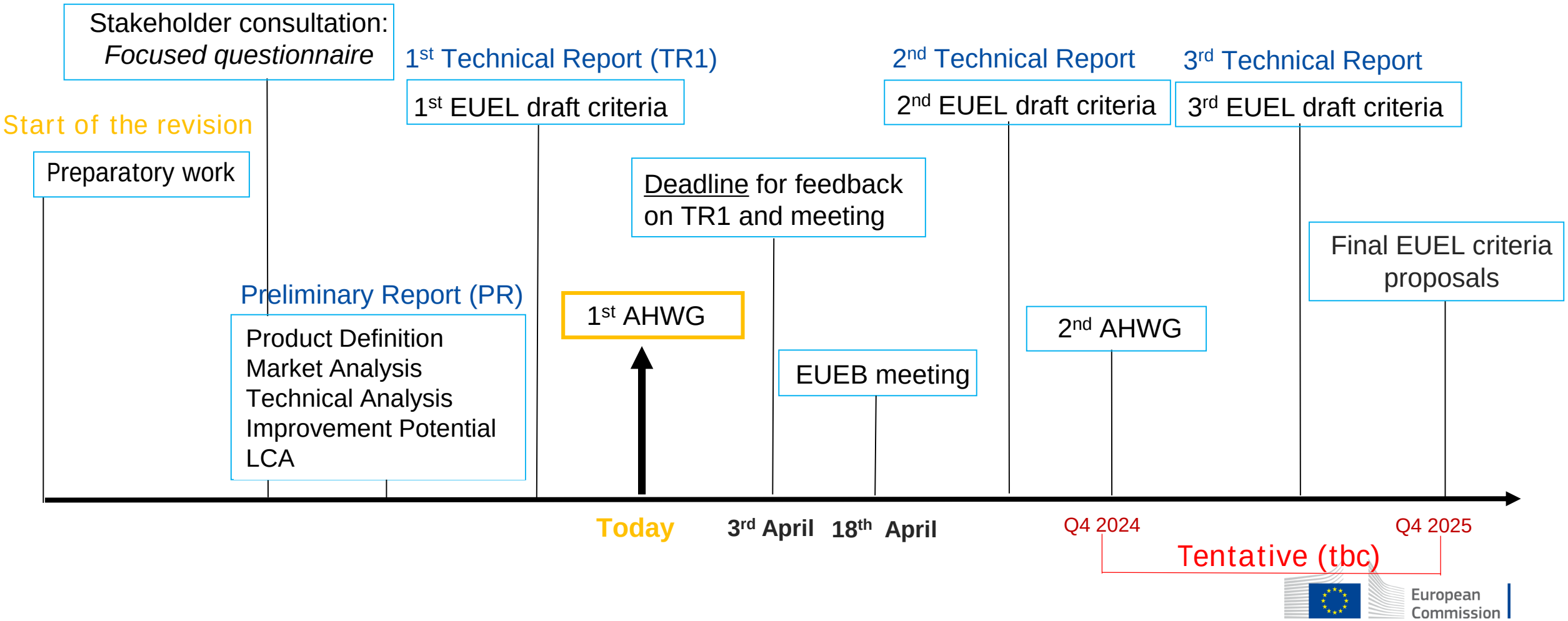
- Laundry detergents (LD) C(2017) 4243 [OJ L 180, 12.7.2017, p. 63–78]

- Industrial and institutional laundry detergents (IILD) C(2017) 4245 [OJ L 180, 12.7.2017, p. 79–96]

Validity expiry date 31/06/26

European Commission

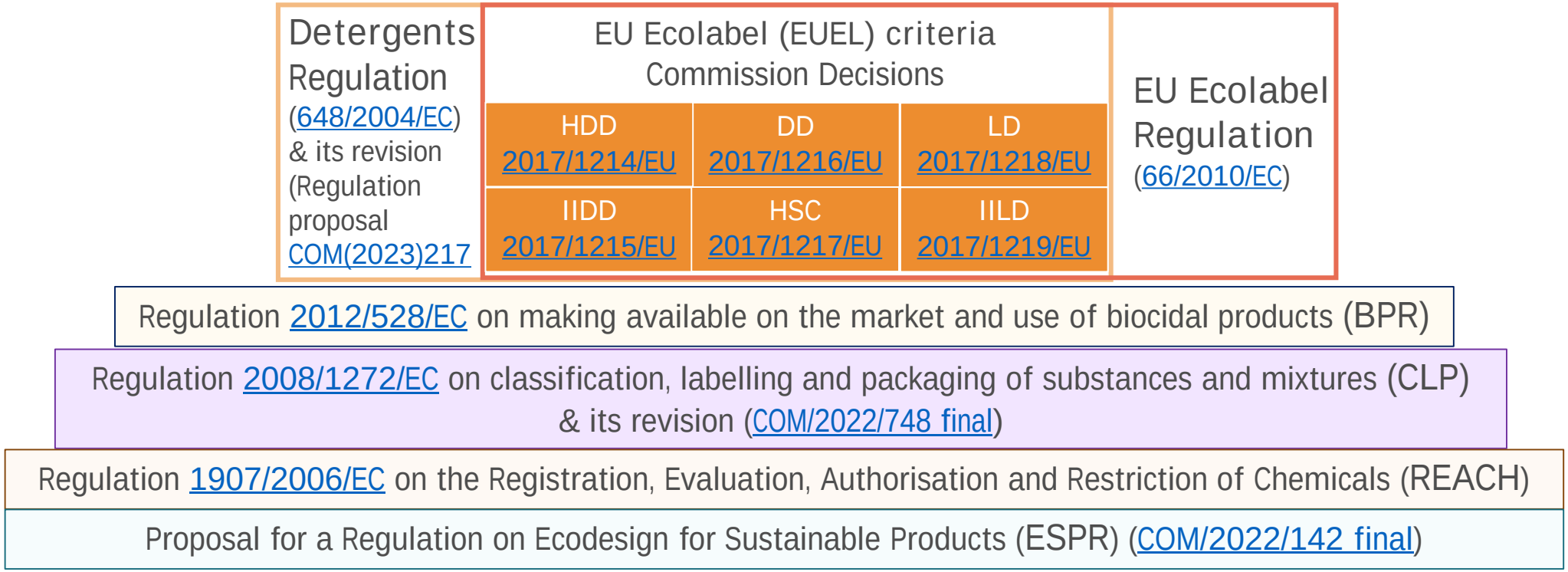
2. The revision of the EUEL criteria Process and timeline



European Commission

3. Preliminary background (PR) information

3. Legislative context (LC I)



3. LC (II)

Detergents Regulation (648/2004/EC) & its revision (Regulation proposal COM(2023)217

EU Ecolabel (EUEL) criteria Commission Decisions

HDD 2017/1214/EU	DD 2017/1216/EU	LD 2017/1218/EU
IIDD 2017/1215/EU	HSC 2017/1217/EU	IILD 2017/1219/EU

EU Ecolabel Regulation (66/2010/EC)

Regulation 2012/528/EC on making available on the market and use of biocidal products (BPR)

Regulation 2008/1272/EC on classification, labelling and packaging of substances and mixtures (CLP) & its revision (COM/2022/748 final)

Regulation 1907/2006/EC on the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)

Proposal for a Regulation on Ecodesign for Sustainable Products (ESPR) (COM/2022/142 final)

Proposal for Empowering consumers for the green transition Directive (COM 2022/0092)

Packaging and Packaging Waste Directive (PPWD) (2018/852/EC) & its revision (Regulation proposal; COM/2022/677 final)

Chemicals Strategy for Sustainability (e.g. package "*one substance, one assessment*"; "*Safe and sustainable by design*" framework)

Corporate Sustainability Reporting Directive (CSRD) (2022/2464)

Other ISO Type I Ecolabels: (e.g. Blue Angel; Nordic Swan)

Urban Waste Water Treatment Directive (UWWTD) (91/271/EEC)

Taxonomy Environment Delegated Regulation (2023/2486)

Deforestation Regulation (1115/2023/EC)

Renewable Energy Directive (REDII;) (EC/2018/2001)

Other EUEL criteria: (e.g. Cosmetics - 2021/1870/EC)

Water Framework Directive (2000/60/EC)

Waste Framework Directive (2008/98/EC)

Proposal for Green Claims Directive (COM 2023/0085)

European Commission

3. Market analysis – Introduction and structure in PR

STRUCTURE

INTRODUCTION – General remarks, including methodological ones.

PRODUCT GROUP* SUB-CHAPTERS:

- *Production and trade*: figures on European imports/exports; production; apparent consumption;
- *Market structure and sales*: european market segmentation; analysis of retail sales figures split by relevant sectors/ product types;
- *Key players*: manufacturers; brands; supply-chain structure;
- *Trends*: relevant trends on innovative products, consumer behaviour and EU Ecolabel statistics (licenses, products);
- *Summary*: capturing the main highlights of the product group section.

CONCLUSIONS – Main highlights

* Grouping

- Hand dishwashing detergents → Hand dishwashing detergents [HDD]
- Hard surface cleaning products → Hard surface cleaning products [HSC]
- Dishwasher detergents
- Industrial and institutional dishwasher detergents → Dishwasher detergents [DD]
- Industrial and institutional laundry detergents
- Laundry detergents → Laundry detergents [LD]




European Commission

3. Market analysis – Methodology (I)

Focused in Europe

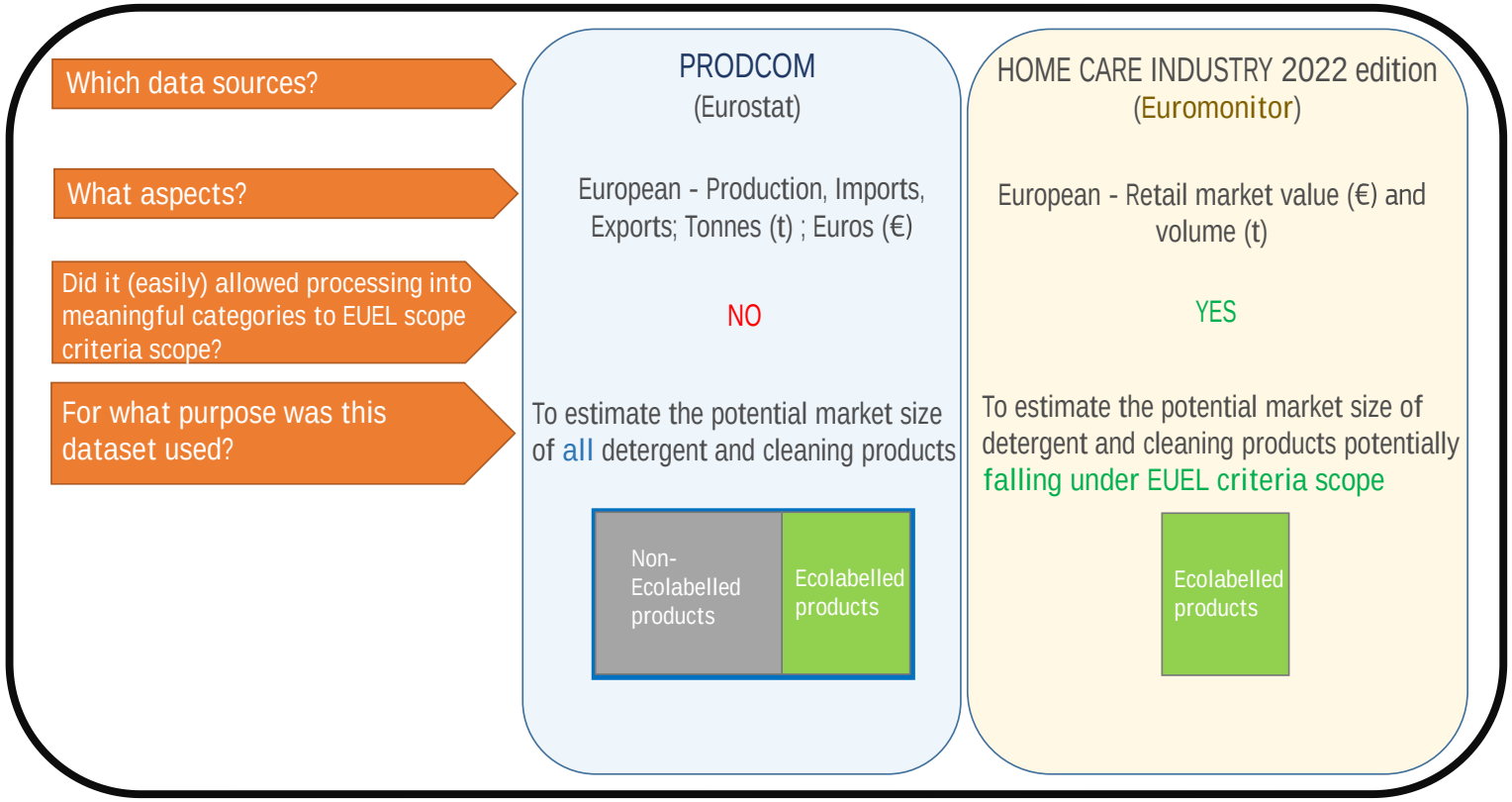
Data/Information sources

- Databases
- Scientific literature
- Market reports
- Others (eg Relevant industry association publications)

Time series considered

- Market data:
  - Generally - last 5 years (2018 -2022)
  - Forecasting – next 5 years (2023 – 2027)
- EU Ecolabel – figures up to September 23
- Other sections – focus on the last 5 years.

Box 1 – Outline of methodological aspects related to market size estimation.



European Commission

3. Market analysis – Methodology (II)

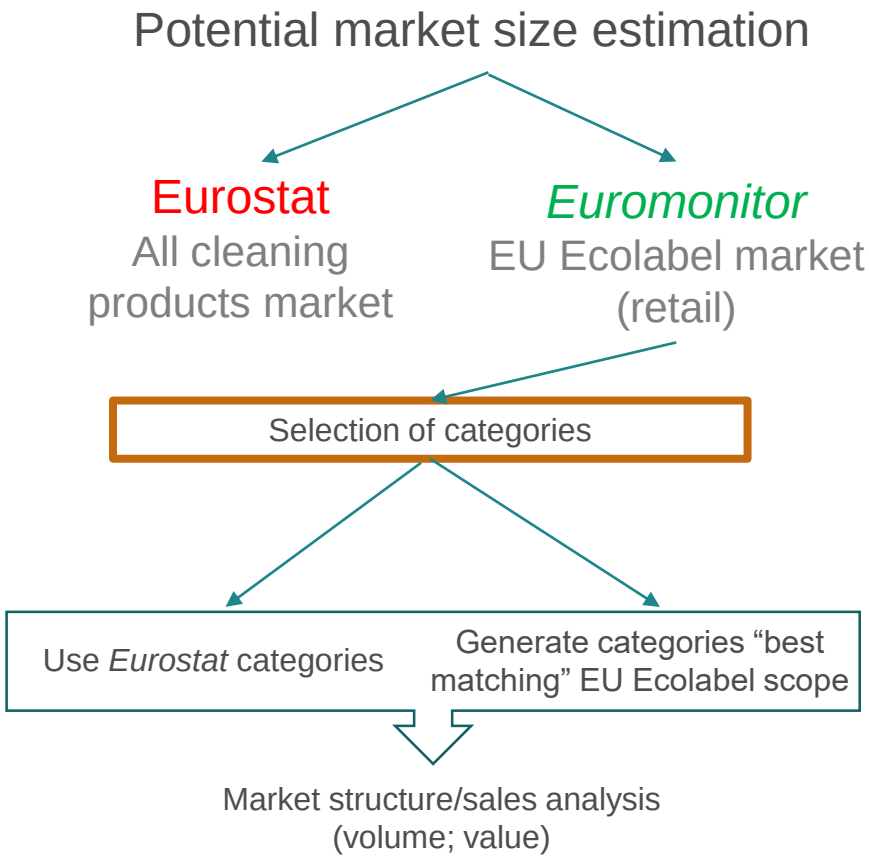


Table 9 – Euromonitor categories correspondent to EU Ecolabel scope for laundry detergents

EU Ecolabel Laundry Detergents scope (as in Commission Decision (EU) 2017/1218 of 23 June 2017)	**Euromonitor Passport (sub-) category**	**Description**
The product group 'laundry detergents' shall comprise any laundry detergent or pretreatment stain remover falling under the scope of Regulation (EC) No 648/2004 of the European Parliament and of the Council_() which is effective at 30 °C or below and is marketed and designed to be used for the washing of textiles principally in household machines, but not excluding its use in public laundrettes and common laundries. Pre-treatment stain removers include stain removers used for direct spot treatment of textiles before washing in the washing machine but do not include stain removers dosed in the washing machine and stain removers dedicated to other uses besides pre-treatment. This product group shall not comprise fabric softeners, products that are dosed by carriers such as sheets, cloths or other materials or washing auxiliaries used without subsequent washing such as stain removers for carpets and furniture upholstery.	*Pre-Wash Spot and Stain Removers*	This is the combination of pre-treaters and others.
	Standard Powder Detergents	Conventional detergents in powdered form for machine washing. Multi-purpose products combining several functions such as detergent and softener or detergent and colour protection are treated as washing detergents and are therefore also included, as long as they are of regular strength and in powder form.
	Concentrated Powder Detergents	Includes all strengths of concentrated textile cleaning powders for machine washing. By definition, a smaller amount of concentrated detergent is needed to produce the same cleaning effect as standard powders. Therefore, packaging is usually more compact. Multipurpose products in concentrated powder form are also included.
	Detergent Tablets	Includes detergents sold in tablet format for machine washing. These could either be in compressed powder or liquid form.
	Standard Liquid Detergents	Conventional liquid detergents for machine washing. Multi-purpose products combining several functions such as detergent and softener or detergent and colour protection are treated as washing detergents and are therefore also included, as long as they are of regular strength
	Concentrated Liquid Detergents	Includes all strengths of concentrated textile cleaning liquids for machine washing. By definition, a smaller amount of concentrated detergent is needed to produce the same cleaning effect as standard liquids. Packaging is also usually more compact than for standard liquids. Multi-purpose products in concentrated liquid form are also included.
	Other Detergents	This is the aggregation of bar, hand wash and fine fabric detergents.

Source: *JRC*

3. Market analysis – Methodology (III)

Potential market size estimation

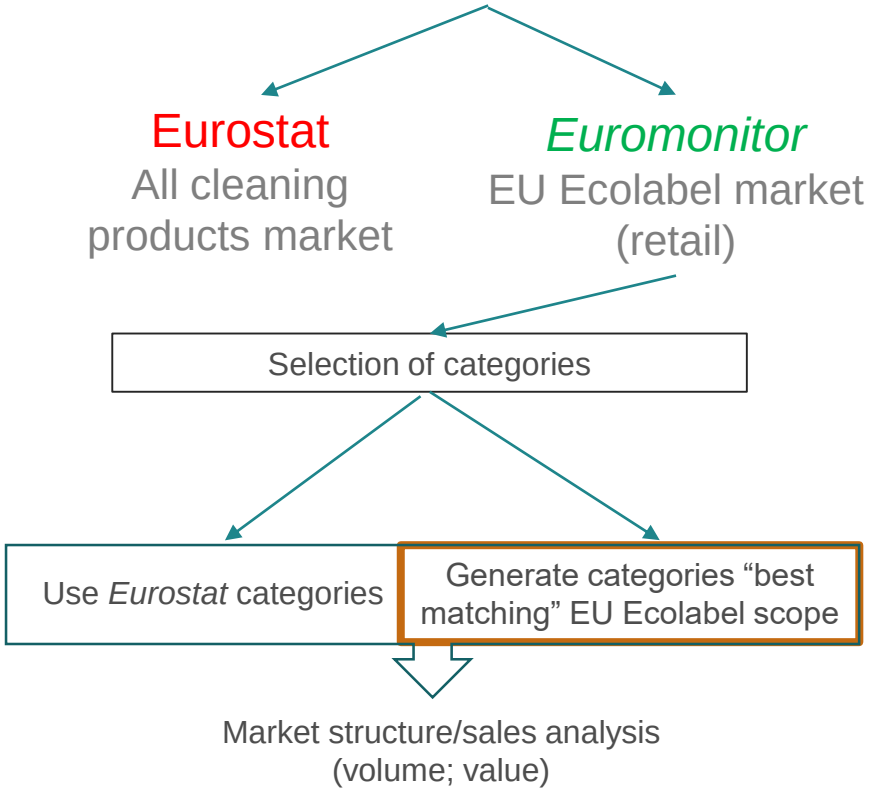


Table 10 – Euromonitor categories being processed into categories "best matching" EU Ecolabel laundry detergents scope, the latter used for EU Ecolabel Laundry detergents retail market analysis.

Category ("best matching" EU ecolabel scope)	**Euromonitor data categories** (being processed)
Concentrated Detergent	Concentrated powder detergents + Concentrated liquid detergents
Standard Detergent	Standard powder detergents + Standard liquid detergents
Liquid Detergents	Standard liquid detergents + Concentrated liquid detergents.
Powder Detergents	Standard powder detergents + Concentrated powder detergents.
Automatic Detergents	Powder detergents + Liquid detergents + Detergent Tablets
Laundry Detergents	Automatic detergents + Other detergents
Laundry Detergents EUEL	Laundry Detergents + Pre-Wash Spot and Stain Removers.

Source: *JRC*

Passport categories & segmentations

Laundry detergents
- *Cleaning method* (Automatic/Other detergents)
- *Type* (Standard/Concentrated/Tablets)
- *Form* (Powder/Liquid/Tablets)

Dishwashing

Hard surface cleaning products (*HSC EUEL*)
- Bathroom cleaners
- Standard floor cleaners
- Kitchen cleaners
- Multi-purpose cleaners
- Window/Glass cleaners

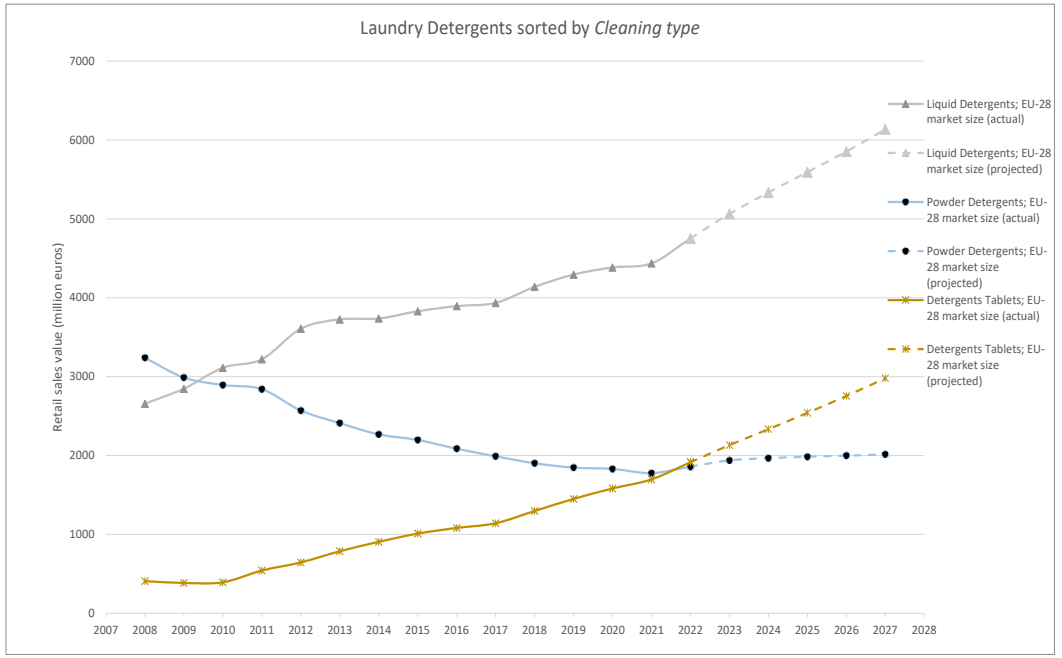
Hand-dishwashing

European Commission

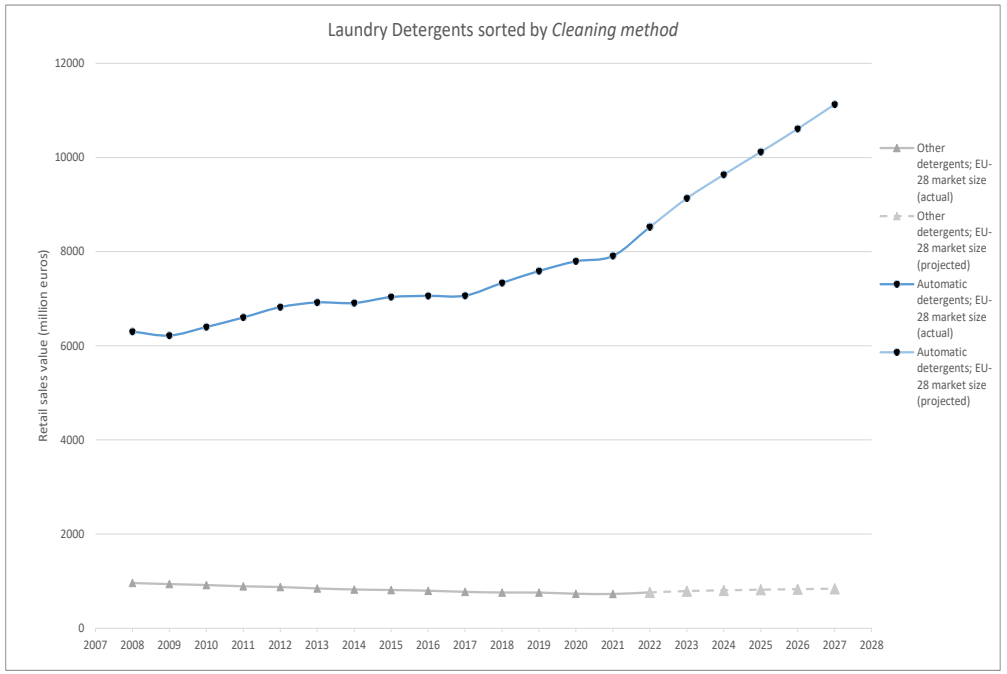
3. Market analysis - Results (I)

Laundry detergents (LD)

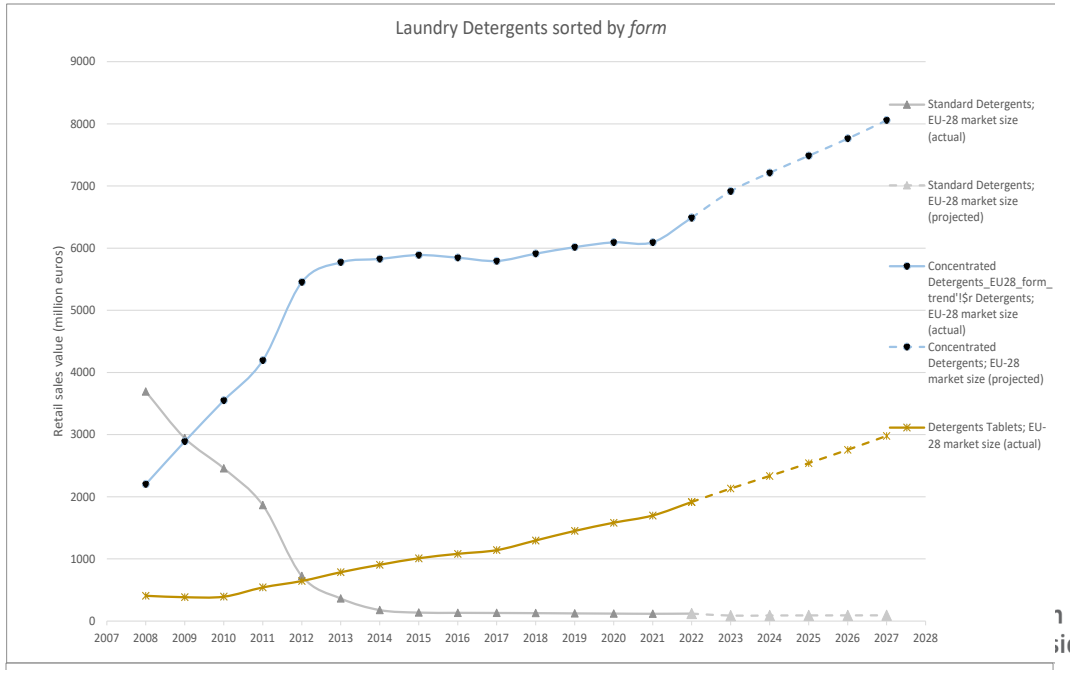
- *Cleaning method* (Automatic/Other detergents)
- *Type* (Standard/Concentrated/Tablets)
- *Form* (Powder/Liquid/Tablets)



Source: *Euromonitor*



Source: *Euromonitor*

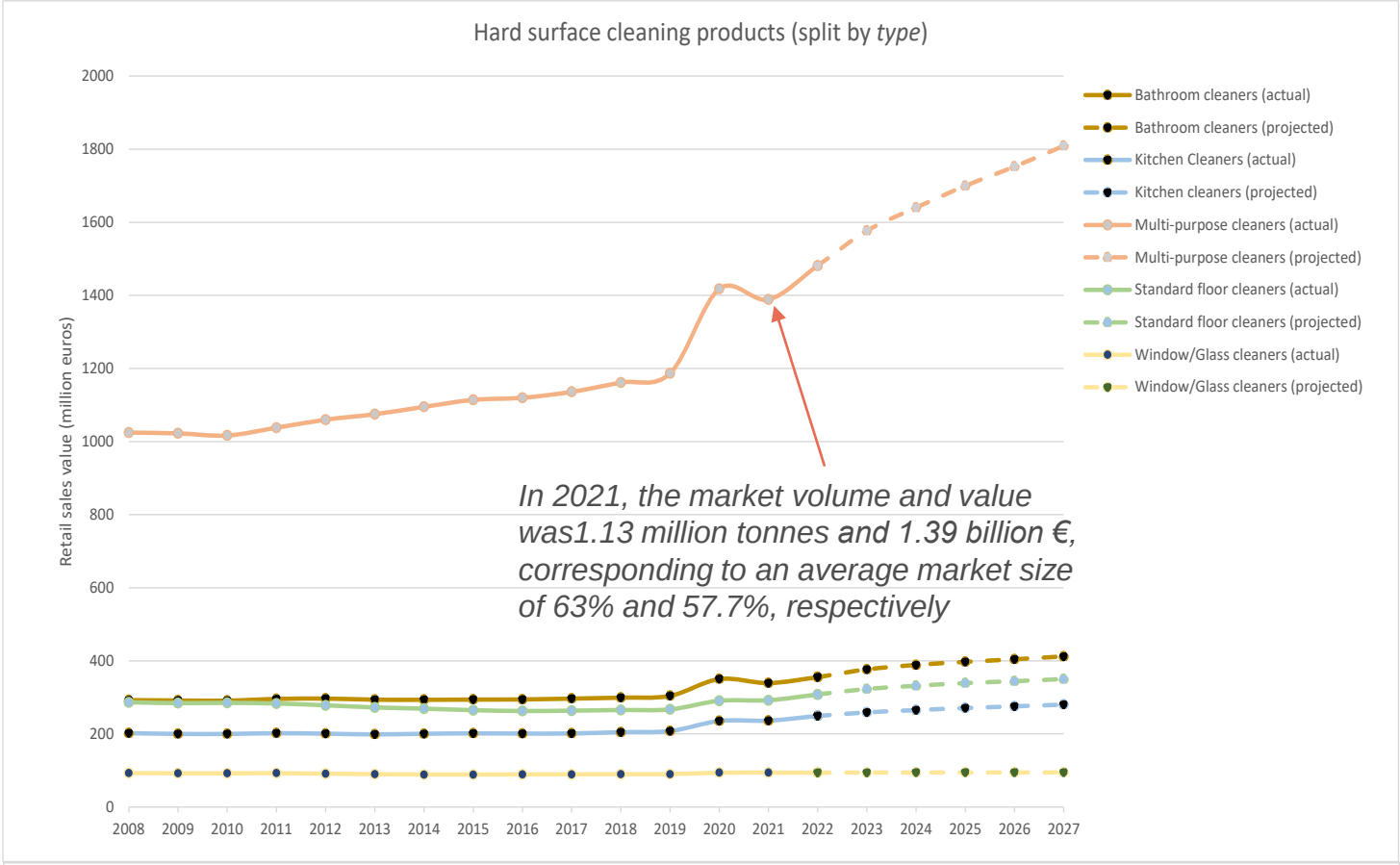


Source: *Euromonitor*

3. Market analysis – Results (II)

Hard surface cleaning products (*HSC EUEL*)

- Bathroom cleaners
- Standard floor cleaners
- Kitchen cleaners
- Multi-purpose cleaners
- Window/Glass cleaners

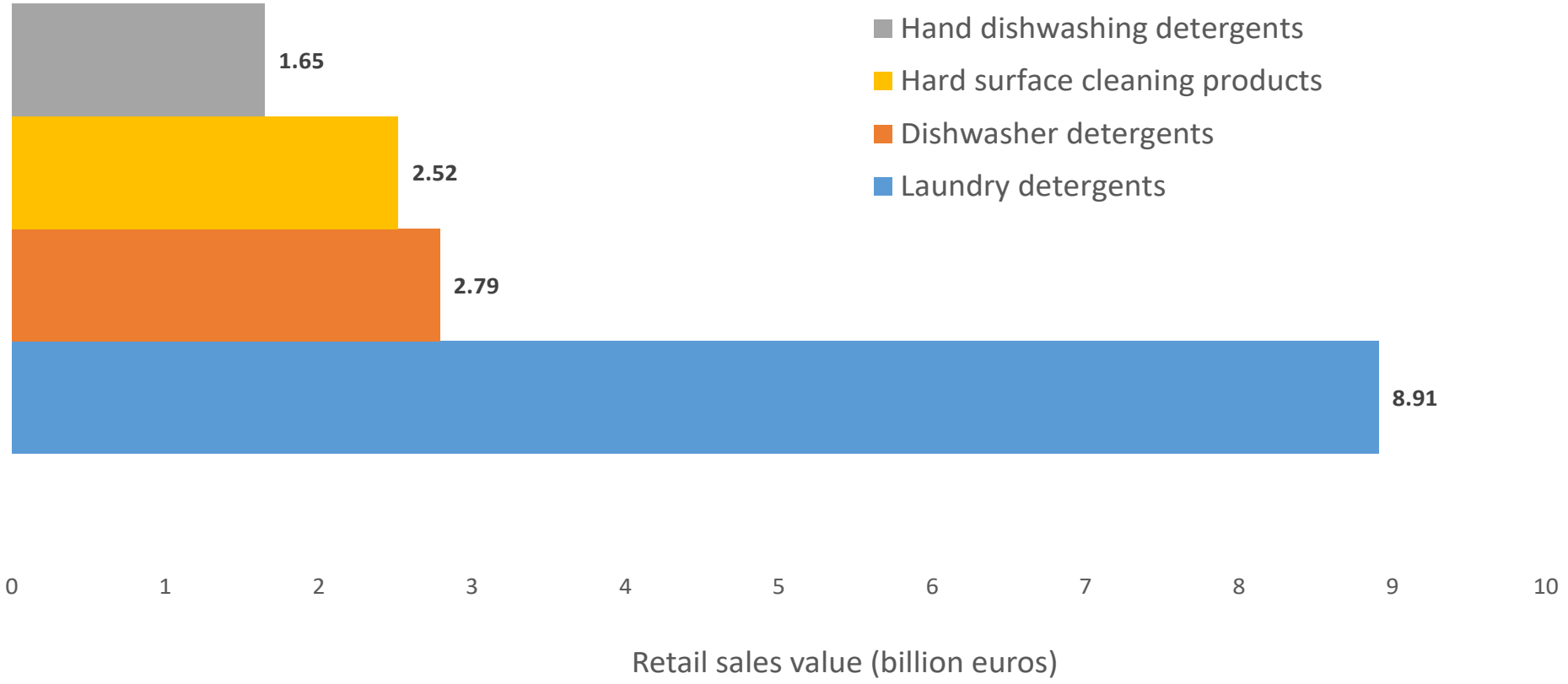


Source: *Euromonitor*

European Commission

3. Market analysis – Results (III)

Figure 31–European (EU28) market size estimation of the EU Ecolabel product groups in 2021.



Source: *Euromonitor*

3. Market analysis – Results (IV)
Trends - Sustainable innovation and & Consumer behaviour

Sustainable innovation

- Ingredients substitution
- Efficient manufacturing
- Concentrated products
- Biobased products
- Refill systems
- Enzymes
- Microbial cleaning products
- *"Cold wash"*

Consumer behaviour

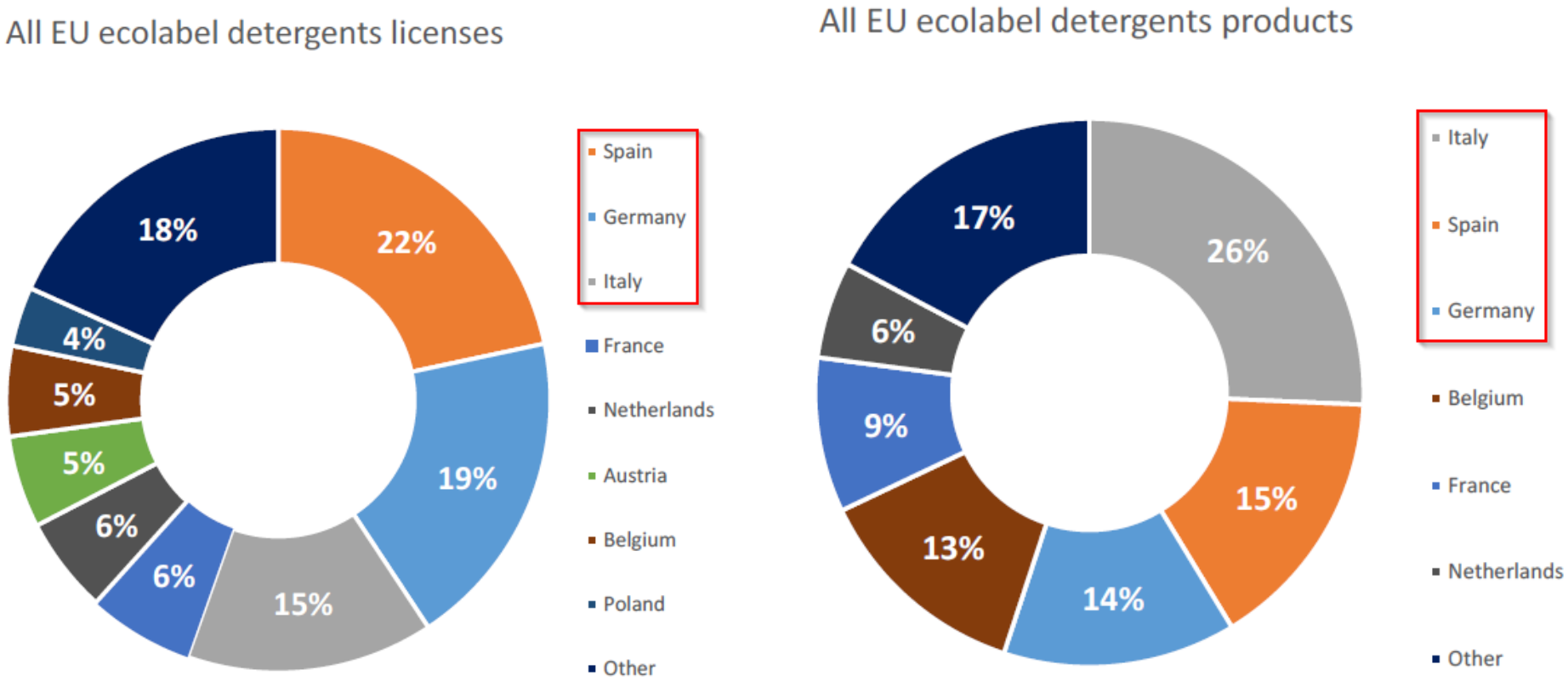
1st functionality (cleaning + hygiene contribution)

2nd clear push for "greener products" under similar cost to conventional (cost as modulator)

LD & DD -> appliance (dishwasher; washing machine) ownership and configuration drives also the demand for detergent products.

3. Market analysis – Results (V)
Trends – EU Ecolabel statistics

Figure 33 - Share of EU Ecolabel detergents licenses (A) and products (B) arranged by EU Member State as on September 23 (Total number of licenses = 2584; Total number of ecolabelled products = 88921).

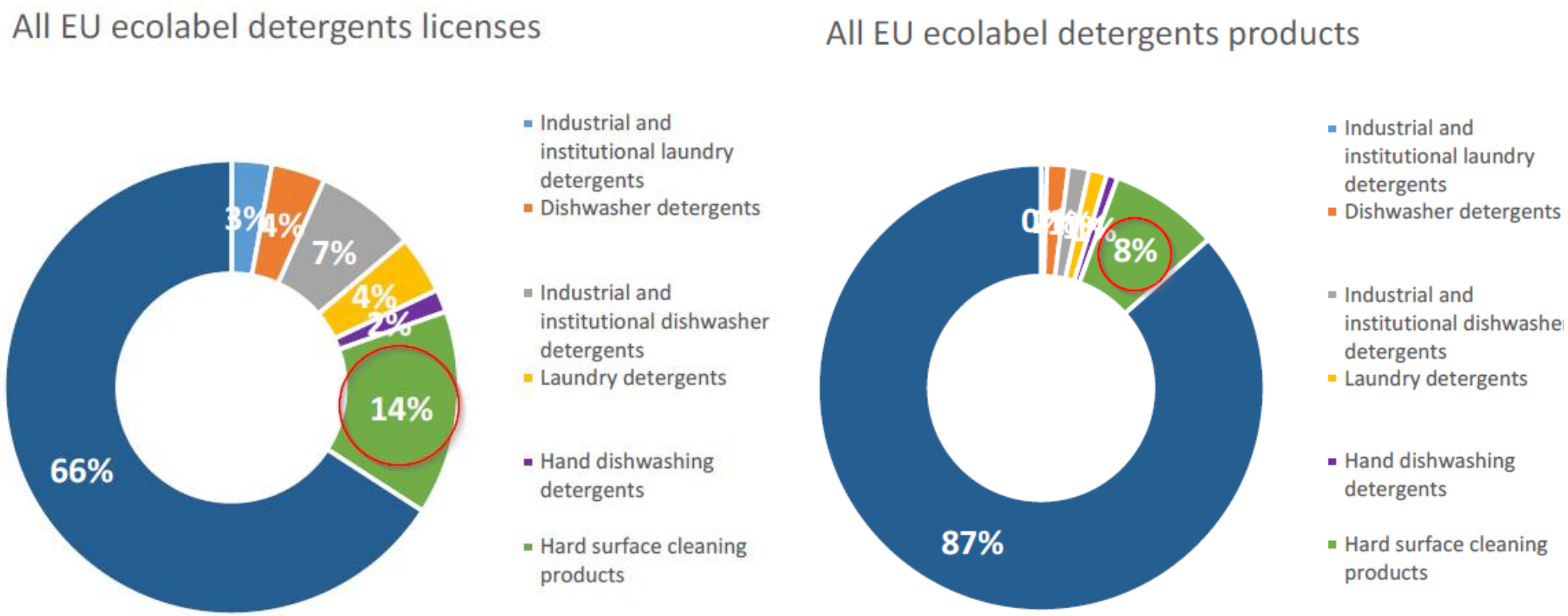


Source: *EU Ecolabel statistics – European Commission*

European Commission

3. Market analysis – Results (VI)
Trends – EU Ecolabel statistics

Figure 34 - Share of EU Ecolabel detergents licenses (A) and products (B) over the total as on September 23



Source: *EU Ecolabel statistics – European Commission*

European Commission

3. Technical analysis – Ingredients (I)

Table 23 – General overview of the type of ingredients commonly used in detergent and cleaner formulations. "*Product group"* shows likely presence of the ingredient type within one or more of detergents and cleaning products.

Ingredient type	Product group/s
Surfactants (surface active agents)	LD DD HDD HSC
Builders	LD DD HSC
Preservatives/Biocides	LD DD HDD HSC
Enzymes	LD DD HDD
Dyes	LD DD HDD HSC
Bleaching agents	LD DD HSC

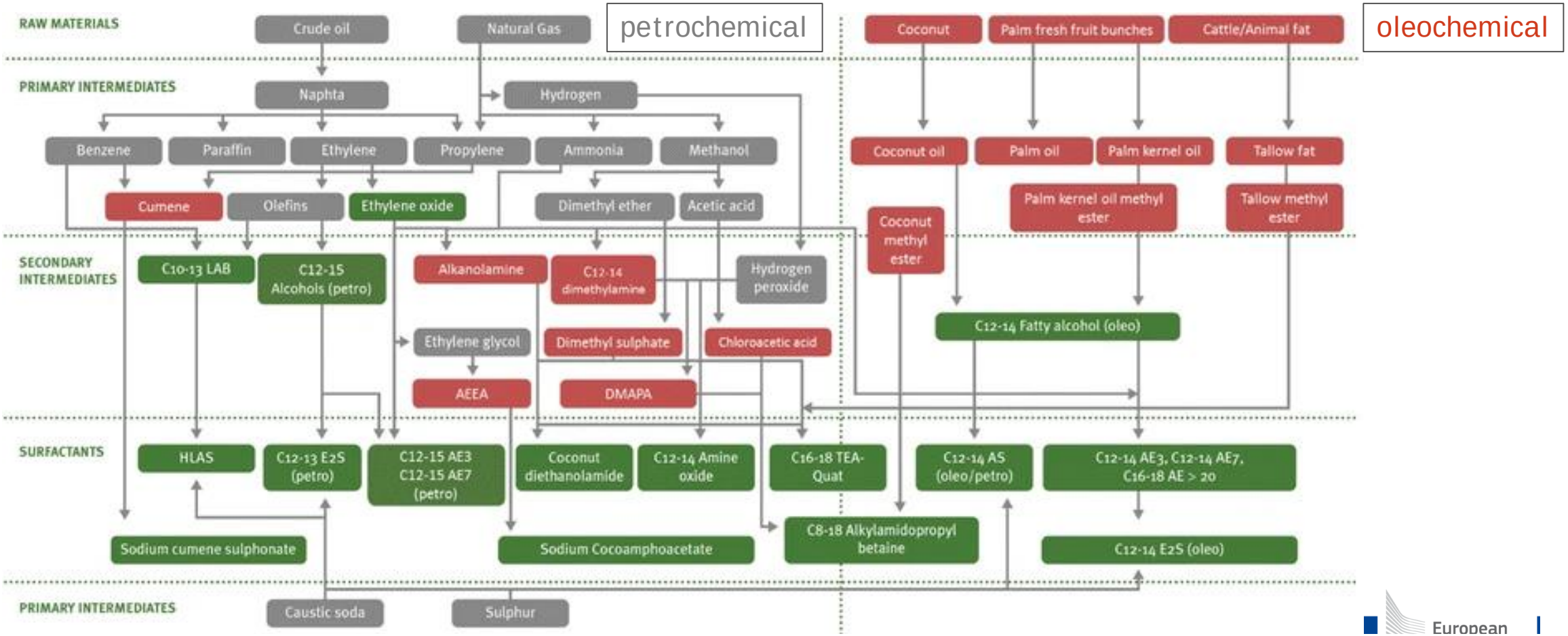
Ingredient type	Product group/s
Fragrances	LD HDD HSC
Solvents	LD HSC
Optical brighteners	LD
Anti-foaming agents	DD
Solubility enhancers	HDD

Ingredient type	Product group/s
Opacifiers	HDD
Acids/Alkalis	HSC
Scouring abrasives	HSC
Thickening agents	HSC

Source: *JRC*

3. Technical analysis – Ingredients (II)

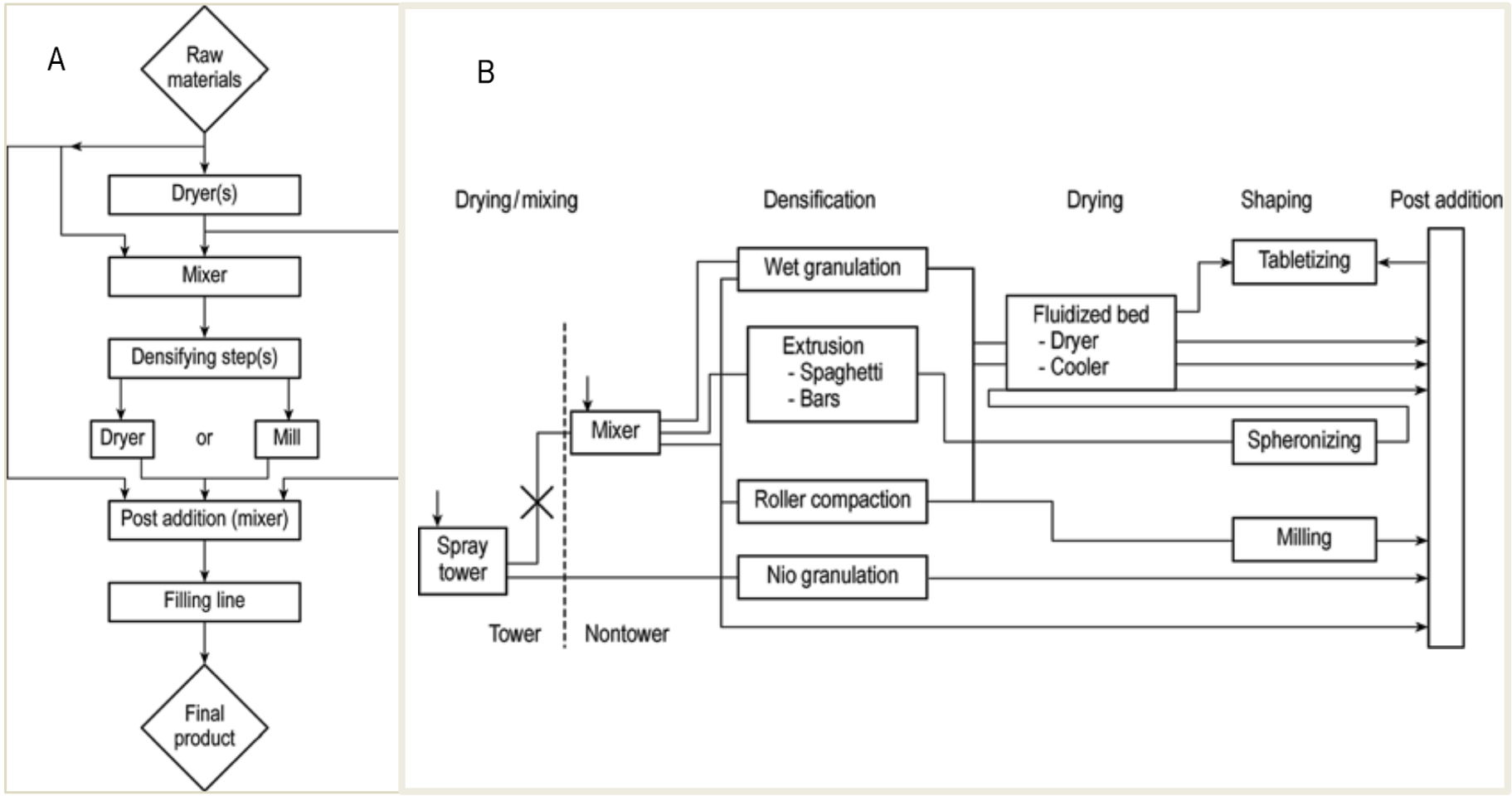
Figure 35 – Overview of substances included in the production of commercially major surfactants and their main precursors/intermediates based on current surfactant production technology (reference year 2011).



Source: *Schowanek, D., T. Borsboom-Patel, A. Bouvy, J. Colling, J.A. de Ferrer, D. Eggers, K. Groenke, et al., 'VIP New and Updated Life Cycle Inventories for Surfactants Used in European Detergents: Summary of the ERASM Surfactant Life Cycle and Ecofootprinting Project', The International Journal of Life Cycle Assessment, Vol. 23, No. 4, April 2018, pp. 867–886. DOI 10.1007/s11367-017-1384-x*

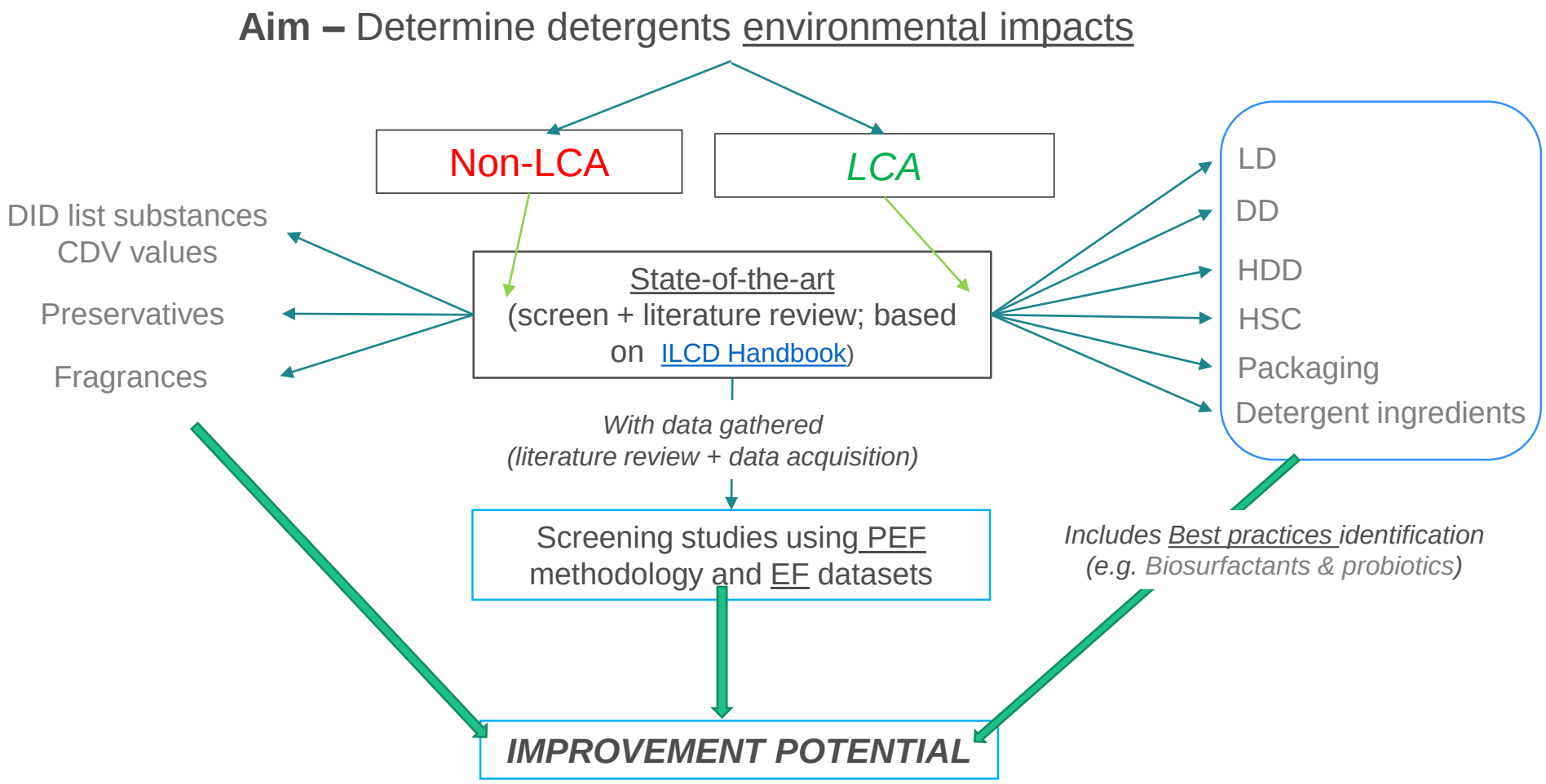
3. Technical analysis – The manufacturing process

Figure 37 – (A) Manufacturing of compact powder detergents; (B) chain of different processes



Smulders, E., and W. Rähse, 'Laundry Detergents, 3. Production, Testing and Economic Aspects', in Wiley-VCH Verlag GmbH & Co. KGaA (ed.), Ullmann's Encyclopedia of Industrial Chemistry, Wiley-VCH Verlag GmbH & Co. KGaA, Weinheim, Germany, 2011, p. o15_o14. DOI 10.1002/14356007.o15_o14

3. Technical analysis – Methodology (I)



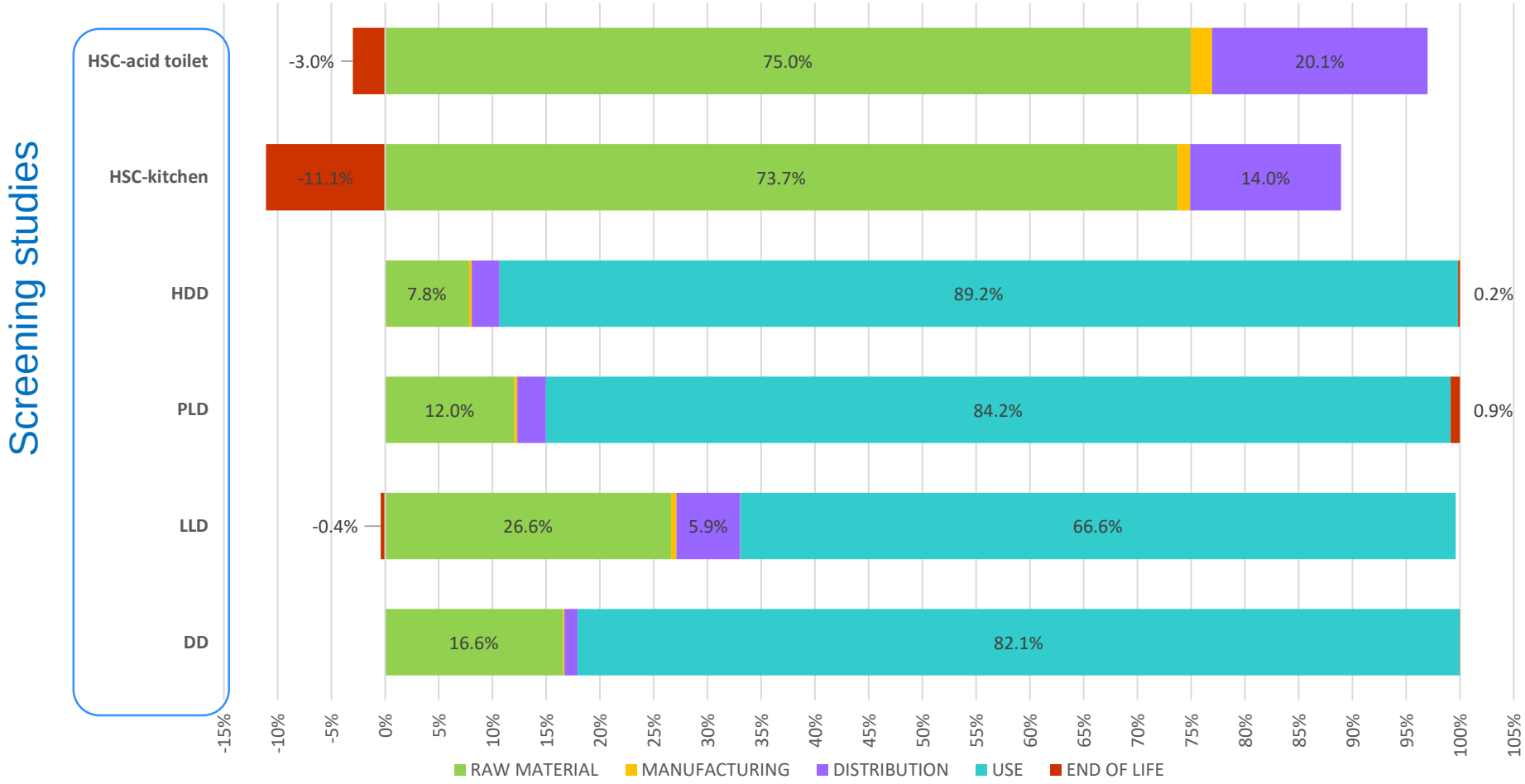
3. Technical analysis – Methodology (II)

Details of the **PEF methodology** are set out in Commission Recommendation (EU) 2021/2279 and this involves some of the following factors, amongst others:

- Default life cycle stages of: raw materials and pre-processing; manufacturing; distribution; use and End of life.
- Reporting characterised results for climate change fossil, climate change biogenic, climate change land use and land use change and for the other 15 impact categories in the associated units.
- Reporting normalised results, which are generated by multiplying characterised results by preset normalisation factors.
- Reporting normalised and weighted results as a single PEF score, generated by multiplying normalised results by preset weighting factors and adding them together.
- Using a circular footprint formula for dealing with the use of recycled content and end of life recycling or reuse.

3. Technical analysis – Methodology (II)

Figure 97. Comparison of relative life cycle stage contributions to overall PEF scores for six different detergent products



PLD = Powder Laundry Detergent

LLD = Liquid Laundry Detergent)

European Commission

3. Technical analysis – Methodology (II)

Table 64. Summary of main aspects considered for improvement potential from an LCA perspective

Aspects	Relevant life cycle stage(s)	Link to EUEL criteria?	Assess improvement potential?
Cold wash compatible LD formulations.	Use stage (possible trade-off at ingredients stage)	Already locked in by the definition of LD products and reinformed in Fitness for use criteria.	Yes. An initial look taken for hypothetical trade-off with LLD in sensitivity analysis. Ultimately depends on user behaviour. Potential trade-off if people use low temp. compatible formulas at higher temps – a kind of overdosing.
Use of gas boiler to heat water for washing instead of electricity in appliance.	Use stage.	No.	No. This is way beyond the control of the detergent manufacturer and often beyond the control of even the consumer.
Raw material source for surfactants (petro- versus various oleo-chemicals).	Raw material - ingredients	Yes, sustainable sourcing of palm oil and palm kernel oil.	Yes. Clear picture from LCA literature review, was investigated using EF datasets, but more detail needed before final conclusions.
Probiotic or microbial-based biosurfactants to substitute chemical ones.	Raw material – ingredients and end-of-life stages.	Tenuous. There is a general non-GMO requirement on micro-organisms intentionally added to HSC products.	Yes. But almost no data available in public domain. Efforts underway to gather primary data.
Procurement of local or regional ingredients	Raw material - ingredients	No.	Yes. Has been looked at in sensitivity analyses of the in-house LCA screening studies.
Fragrance-free or dye-free formulations	Raw material - ingredients	Tenuous. There are already general conditions tailored for these substance groups.	Yes. Has been looked at in sensitivity analyses of the in-house LCA screening studies for LLD products.
Low- or no-preservation strategies	Raw material - ingredients	Tenuous. There are already some general conditions tailored for this substance groups.	Yes. Has been looked at in a rough way in the sensitivity analyses of the in-house LCA screening studies for LLD products.
Minimum recycled content for packaging	Raw material - packaging	Yes. An option in the packaging criteria, but not mandatory.	Yes. Has been looked at in sensitivity analyses of the in-house LCA screening studies.
Dose compaction	Raw material – ingredients and in distribution stage.	Yes. There are maximum dose requirements for g/kg laundry. Also may link to CDV criteria.	Yes. In one example of PLD, in a sensitivity analysis of two alternative representative formulations in the in-house LCA screening studies. But this made it impossible to isolate the effects.
Enzyme addition to reduce surfactant requirements.	Raw material - ingredients	Tenuous. Restrictions on certain hazards with enzymes (derogations too). May help reduce doses as well.	
Dose control	Use phase	Dosing instructions in user information and automated dosing for IILD and IIDD.	Yes. Overdosing and underdosing scenario run in sensitivity analysis for HDD products in the in-house LCA screening study.

Questions / Comments?

European Commission

4. Scope and definitions

4. Product group names

Proposed product group names	
DD	Dishwasher detergents
HDD	Hand dishwashing detergents
HSC	Hard surface cleaning products
IIDD	Professional ~~Industrial and institutional~~ dishwasher detergents
IILD	Professional ~~Industrial and institutional~~ laundry detergents
LD	Laundry detergents

Detergent Regulation 648/2024

*'**Industrial and institutional detergent**' means a detergent for washing and cleaning outside the domestic sphere, carried out by specialised personnel using specific products.*

Proposal for Detergent Regulation 2023/0124 (COD)

*'**professional detergent**' means a detergent for cleaning outside the domestic sphere, carried out by specialised personnel using specific products;*

Points for discussion 1 - Product group names

Stakeholders are invited to reply the following consultation question:

— Question 1 (**Q1**) – Would you support the substitution of the term "*Industrial and Institutional*" by "*Professional*"? If not, why?

European Commission

4. Scope – Overview & general considerations

Directions for scope revision

Product Innovation

Legislative changes

Stakeholders' feedback

Considered

PG	Scope revision areas	
LD?	Inclusion of fabric enhancers (softerners)	✖
LD	Inclusion of in-wash stain removers	✖? *e.g. Formulations*
LD	Use of detergents that contains microorganisms.	✖? *Safety*
HSC	Exclusion of the RTU products	✖
LD	Temperature of laundry efficiency	☺?

IF cleaning performance preserved

LD	The product group 'laundry detergents' shall comprise any laundry detergent or pretreatment stain remover falling under the scope of Regulation (EC) No 648/2004 of the European Parliament and of the Council[27] which is effective at ~~30~~ 20 °C or below and is marketed and designed to be used for the washing of textiles principally in household machines, but not excluding its use in public laundrettes and common laundries. Pre-treatment stain removers include stain removers used for direct spot treatment of textiles before washing in the washing machine but do not include stain removers dosed in the washing machine and stain removers dedicated to other uses besides pre-treatment. This product group shall not comprise fabric softeners, products that are dosed by carriers such as sheets, cloths or other materials or washing auxiliaries used without subsequent washing such as stain removers for carpets and furniture upholstery.

Not considered

PG	Scope revision areas
LD	Biocidal products
LD	Mono-ingredient products
LD	Outdoor/Special cleaning

European Commission

4. Scope – Fabric enhancers (softeners) [LD?]

Inclusion of Softeners in EUEL

Purpose/function

Condition and protect the fabric/ Reduce friction during wash for softer fabric/ aesthetic functions

Cationic surfactants: quaternary ammonium cations (quats).
Dominant technology: ester quats

Pros:

- Significant potential environmental gains with environmentally friendlier versions due to high market share (by value).

Cons:

- Do not directly contribute to cleaning and their main function is aesthetic
- Challenges in assessing and differentiating toxicity profiles, especially between eco-label and non-eco-label formulations

Table 8 – Laundry care sub-categories and associated market value during 2021

	Market value (billion €)	Laundry care share (%)
Laundry Detergents ([1161])	9.5	63.3
Fabric conditioners	2.7	18.0
Laundry aids; Other	2.8	18.7

Source: Euromonitor (EU 27 + UK + CH + NO) via A.I.S.E. Activity and Sustainability Report 2021-2022 ([162])

European Commission

4. Scope – Fabric enhancers (softeners) [LD?]

Other Ecolabel

- Nordic Ecolabel allows softeners only as part of multi-component system.
- GECA Ecolabel (CPv3.0-724 2022) & US Green Deal (GS 48) have dedicated sub-categories

Concluding remarks

- Amongst quaternary ammonium cations, esterquats still remain as prevalently used.
- No relevant reduction in cationic surfactant share in softeners formulation
- Detailed full formulations were not shared with JRC (so far).

The decision is **not** to expand the scope of LD **to include softeners**

4. Scope – In-wash stain removers [LD]

Inclusion of In-wash stain removers in EUEL

Existing EUEL scope

- LD include only pre-treatment stain removers.
- IILD include multi-component systems may incorporate a number of products including stain removers

Other Ecolabel

- Nordic Ecolabel includes all types of stain removers in domestic and institutional laundry detergent
- Good Environmental Choice (Bra Miljöva) has a specific product category for stain removers
- Eco Choice Aotearoa includes stain removers in commercial and institutional laundry detergents.
- Blue Angel includes pre-treatment stain removers and laundry detergent boosters and pre-treatment stain for domestic LD

Cons:

- In-wash stain removers add additional and **potentially unnecessary chemical loa**d, as compared to pre-wash treatment.
- In-wash stain removers are generally considered auxiliary products **not strictly necessary for routine laundry cleaning**.

Pros:
In-wash stain removers **enhance cleaning performance**, potentially reducing the need for additional washes and conserving resources.

Pre-treatment stain removers are applied in limited doses directly to difficult stains, minimizing their overall chemical load while maximizing cleaning performance

4. Scope – In-wash stain removers [LD]

A comprehensive assessment should focus primarily on the **dosage** and **chemical composition**

Data wanted!
(e.g. **formulation**; In- wash Vs Pre-treatment)

Preliminary results from the focused questionnaire

- 17/82 shared the type of ingredient and a typical range (X-Y%)
- Full formulations were not shared
- Other substances/ingredients mentioned
  - Bleaching agents: sodium hypochlorite, hydrogen peroxide, peracetic acid, sodium percarbonate + TAED+ and phtaloimidoperoxyhexanoic acid (PAP)
  - Without bleaching agents: enzymes

Ingredient	*Range (%)*
Surfactant	7-25
Solvents	5-10
Sequestering agents	5-10
Enzymes	<1
Water	Variable

At this stage, **inclusion of in-wash stain removers is not proposed**

European Commission

4. Scope – Microbial containing products [HSC; LD]

ADD CLEANING MECHANISM PRINCIPLE?
OTHER ECOLABELS?

Existing EUEL scope

- HSC (professional only) – Sub-criterion 4 (h).

Proposal for Detergent Regulation 2023/0124 (COD)

Article 2
Definitions

For the purpose of this Regulation, the following definitions apply:

(1) 'detergent' means any of the following:

– a substance, mixture or micro-organism, or two or more such materials in combination, which is intended for cleaning of fabrics, dishes or surfaces;

Industry stakeholders feedback
(existing innovation, reduced WWTP organic load)

Considered EUEL scope expansion
- HSC (professional *& household*)
- LD (*household*)

✖ ?

Pros:
Substitution of chemical ingredients while maintaining cleaning performance

Reduced environmental footprint and/or impact (e.g. increased degradability).

Cons:
- At this stage, **uncertainty** about **product** (biological) **safety (e.g.** risk to human health) (*).

Data wanted!
(e.g. **formulation**; safety assessments)

Further discussion sub-criterion microorganisms

(*) La Maestra, S., F. D'Agostini, M. Geretto, and R.T. Micale, 'Microbial-Based Cleaning Products as a Potential Risk to Human Health: A Review', Toxicology Letters, Vol. 353, December 2021, pp. 60–70.

European Commission

4. Scope – Microbial containing products [HSC; LD]

Points for discussion 2 – Scope (LD – Microorganisms)

Stakeholders are invited to reply the following consultation question:

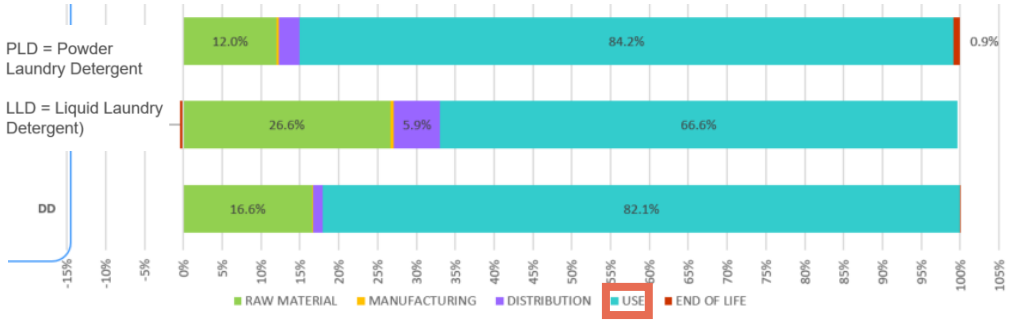
- Question 2 (**Q2**) – Would you support the inclusion of microorganisms in the scope of LD? If not, why?
- Question 3 (**Q3**) – Should the text of LD scope be modified to reflect that microorganism are included in the scope?

Data wanted!
(e.g. **formulation**; safety assessments)

4. Scope – Temperature of laundry efficiency [LD]

Existing EUEL scope
- LD ; ≤ 30C

Proposed EUEL scope
- LD ; ≤ ***20C***



Pros:
Decreased energy consumption (washing water heating).

Focus questionnaire preliminary analysis -> **There are products already in the market (≤ 20C)**:
- From CBs (12/82) ->licenses/products claiming efficiency ≤ 20C.
- From IND (14/82) -> [LD] products effective at < 30C (20C or 15C)

Cons *(trade-offs)*:
- Decreased cleaning performance.
- Additional chemical load (to keep cleaning performance).
- User behavior (misuse)

The **decrease** of the minimum temperature efficiency (**≤ 20C**) **is proposed** (*only **if** product **cleaning efficiency is maintained***)

European Commission

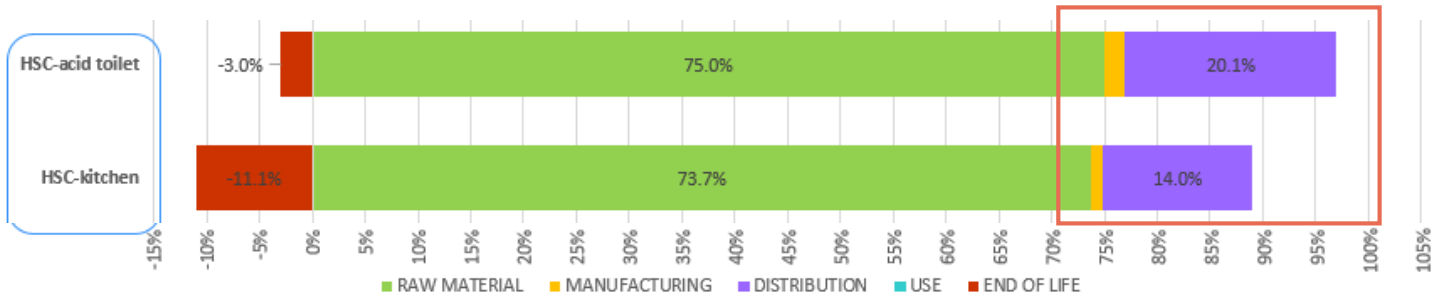
4. Scope – Temperature of laundry efficiency [LD]

Points for discussion 3 – Scope (LD – Temperature of laundry efficiency)

Stakeholders are invited to reply the following consultation question:

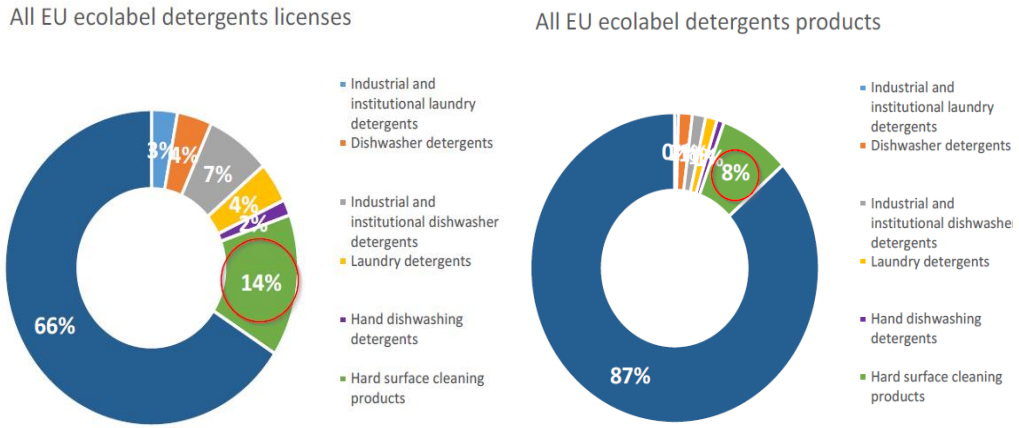
— Question 4 (**Q4**) – Current scope states that laundry detergents gave to be effective at 30 °C or below. Would you support lowering this temperature (e.g. 20 °C). If not, why? If yes, down to which temperature?

4. Scope – The exclusion of RTU products [HSC]



Pros:

- User-friendliness
- Additional environmental gains achievable with undiluted (more concentrated) versions via reduced distribution (transport) impacts



Cons:

- Reduction of eligible products (as RTU holds significant [EUEL] market share).
- Reduced net environmental benefits (considering RTU market share).

4. Scope – The exclusion of RTU products [HSC]

Relevant aspects considered/willing to know more about by JRC:

- Ecolabelled products market reality with regards to RTU/undiluted products share (*which is the magnitude of the potential impact of RTU ban?*).
- Granularity - details about product sub-groups (*which concentrates higher EUEL share?),*
- Knowledge about their formulations (*which are their chemical profile and the potential associated environmental impacts*).
- Potential and feasibility of implementing new provisions (*how RTU should/can be penalised ; how undiluted should/can be favoured?*)

Focused questionnaire
(preliminary analysis**)**

Stakeholders (industry, CBs) feedback

The decision is **not to ban RTU** from the HSC scope. Alternative provisions to favour undiluted products are considered.

European Commission

4. Scope – The exclusion of RTU products [HSC]

Points for discussion 4 – Scope (HSC – The exclusion of RTU

Stakeholders are invited to reply the following consultation question:

— Question 5 (**Q5**) **–** Do you support maintaining RTU products as part of HSC scope? If not, why?

Data wanted! (e.g. **formulation**)

European Commission

4. Scope – Questions recap

Data wanted! (e.g. **formulation**)

Points for discussion 2 – Scope (LD – Microorganisms)

Stakeholders are invited to reply the following consultation question:

— Question 2 (**Q2**) – Would you support the inclusion of microorganisms in the scope of LD? If not, why?

— Question 3 (**Q3**) – Should the text of LD scope be modified to reflect that microorganism are included in the scope?

Points for discussion 3 – Scope (LD – Temperature of laundry efficiency)

Stakeholders are invited to reply the following consultation question:

— Question 4 (**Q4**) – Current scope states that laundry detergents gave to be effective at 30 °C or below. Would you support lowering this temperature (e.g. 20 °C). If not, why? If yes, down to which temperature?

Points for discussion 4 – Scope (HSC – The exclusion of RTU

Stakeholders are invited to reply the following consultation question:

— Question 5 (**Q5**) – Do you support maintaining RTU products as part of HSC scope? If not, why?

European Commission

4. Definitions – Overview & general considerations

Directions for definition revision

Alignment (ISO Type I ecolabels; standards)
Legislative developments
Improvement of criteria interpretation and enforcement

Updated

PG	Definition
ALL	Ingoing substances
	Microplastic
	Primary packaging
	Secondary packaging
	Tertiary packaging
	Nanomaterials

New

PG	Definition
ALL	Impurities
	Polymer
	Synthetic polymer
	Packaging
	Composite packaging
	Substances identified to have endocrine disrupting properties

Unchanged

PG	Scope revision areas
HSC	Undiluted product
	Ready-to-Use (RTU) product
LD	Heavy-duty detergent
	Colour-safe detergent
	Light-duty detergent

4. Definitions – Ingoing substance

Updated

Definition

Ingoing substances

DD, HDD	Ingoing substances	*'ingoing substances' means substances intentionally added, by-products and impurities from raw materials in the final product formulation (including water-soluble foil, where used);*
HSC, IIDD, IILD, LD		*'ingoing substances' means substances intentionally added, by-products and impurities from raw materials in the final product formulation (including water-soluble foil, if used)*
ALL	Ingoing substances	*'ingoing substances' means all substances in the detergent/cleaner product, including additives (e.g. preservatives and stabilisers) in the raw materials. Substances known to be released from ingoing substances (e.g. formaldehyde from preservatives and arylamine from azodyes and azopigments) shall also be regarded as ingoing substances. Unintended constituents (residuals, pollutants, contaminants, by-products, etc.) from production, incl. production of raw materials, that remain in the raw materials ≥ 1 000 ppm (≥ 0,1000 %w/w ≥ 1 000 mg/kg) are always regarded as ingoing substances, regardless of the concentration in the final product;* *Foil that is not removed before use of the product and that is water soluble is considered as part of the formulation/recipe.*

Alignment with EUEL Cosmetics & other ecolabels.

Specify foil as ingoing substance (part of formulation).

New

Definition

Impurities

ALL	Impurities	*'impurities' means unintended constituents (residuals, pollutants, contaminants, by-products, etc.) from production, incl. production of raw materials, that remain in the raw material/ingredient and/or in the in the final product in concentrations less than 100 ppm (0,0100 % w/w, 100 mg/kg) and that were not intentionally added.*

Alignment with EUEL Cosmetics

Clarifies and sets thresholds for EUEL application.

4. Definitions – Packaging-related

***Drivers** for the change - legislative developments & improvement of criteria interpretation and enforcement*

***Alignment** with those definitions in the proposal for a Regulation on Packaging and Packaging waste (COM/2022/677 final).*

Updated

Definition	
Primary packaging	*Sales* packaging
Secondary packaging	*Grouped* packaging
Tertiary packaging	*Transport* packaging

Updated definitions also imply a change in the terms proposed!

New

Definition
Packaging
Composite packaging

New definitions aid to better formulate packaging related criteria

4. Definitions – Packaging-related

New

Definition
Packaging

ALL	Packaging	*'packaging' means 'items of any materials that are intended to be used for the containment, protection, handling, delivery or presentation of products and that can be differentiated into packaging formats based on their function, material and design, including:* *(a) items that are necessary to contain, support or preserve the product throughout its lifetime without being an integral part of the product which is intended to be used, consumed or disposed of together with the product;* *(b) components of, and ancillary elements to, an item referred to in point (a) that are integrated into the item;* *(c) ancillary elements to an item referred to in point (a) that are hung directly on, or attached to, the product and that performs a packaging function without being an integral part of the product which is intended to be used, consumed or disposed of together with the product;* *(d) items designed and intended to be filled at the point of sale, provided that they perform a packaging function;* *(e) disposable items sold, filled or designed and intended to be filled at the point of sale, provided that they perform a packaging function;* *in the context and for compliance with this EU Ecolabel criteria, items potentially falling under clause (a) definition that are part of a single dose unit (product and wrappers/films (or equivalent)), that are water-soluble and that are not removed prior to the product use for washing/cleaning purposes, shall not be regarded as packaging but rather as part of the product formulation. Conversely, items potentially falling under clause (a) definition that are part of a single dose unit (product and wrappers/films (or equivalent)), that are water-insoluble and that are removed prior to the product use for washing/cleaning purposes, shall be regarded as packaging but not as part of the product formulation*
ALL	Composite packaging	*'composite packaging' means a unit of packaging made of two or more different materials, excluding materials used for labels, closures and sealing, which cannot be separated manually and therefore form a single integral unit;*

Definition as in [COM/2022/677 final]
but restricting formats to those deemed applicable to detergent and/or cleaning products

New text added **setting conditions** to differentiate **when foil is packaging** and when not (thus part of the formulation).

Definition
Composite packaging

Added to aid in criteria formulation (e.g. *design for recycling*)

4. Definitions – Packaging-related

Current

Updated

Definition	
Primary packaging	*Sales* packaging
Secondary packaging	*Grouped* packaging
Tertiary packaging	*Transport* packaging

Current definitions taken from UM (not in criteria text)

ALL	Primary packaging	*'primary packaging' means:* *(a) for single doses in a wrapper that is intended to be removed before use, the individual dose wrapping and the packaging conceived so as to constitute the smallest sales unit of distribution to the final user or consumer at the point of purchase, including label where applicable;* *(b) for all other types of products, packaging conceived so as to constitute the smallest sales unit of distribution to the final user or consumer at the point of purchase, including label where applicable;*
ALL	~~Primary packaging~~ Sales packaging	*'sales packaging', also known as ~~'primary packaging'~~, means:* *~~(a) (a) for single doses in a wrapper that is intended to be removed before use, the individual dose wrapping and the packaging conceived so as to constitute the smallest sales unit of distribution to the final user or consumer at the point of purchase, including label where applicable;~~* *(b) ~~(b) for all other types of products,~~ packaging conceived so as to constitute the smallest sales unit of ~~distribution~~ products and packaging to the final user or consumer at the point of sale ~~purchase, including label where applicable~~;*
ALL	~~Secondary packaging~~ Grouped packaging	*'grouped packaging', also known as ~~'secondary packaging'~~, is packaging conceived so as to constitute a grouping of a certain number of sales unit at the point of sale ~~purchase~~ whether the latter is sold as such to the end user or ~~a grouping of a certain number of sales units and~~ it serves only as a means to replenish the shelves at the point of sale or create a stock-keeping or distribution unit; and which ~~it~~ can be removed from the product without affecting its characteristics.*
ALL	~~Tertiary packaging~~ Transport packaging	*'transport packaging', also known as 'tertiary packaging' means ~~is~~ packaging conceived so as to facilitate handling and transport of a number of sales units or grouped packag~~esing~~, including e-commerce packaging but excluding road, rail, ship and air containers, in order to prevent physical handling and transport damage. ~~Transport packaging does not include road, rail, ship and air containers.~~*

Now covered by the new "*Packaging*" definition.

4. Definitions – Microplastic-related

Drivers *for the change - legislative developments & improvement of criteria interpretation and enforcement*

Alignment *with those definitions as regards synthetic polymer microparticles (microplastics ban), via amendment of Annex XVII of the Regulation (EC) No 1907/2006 (REACH) (C/2023/6419).*

Updated

Definition
Microplastic

New

Definition
Polymer
Synthetic polymer

ALL	Polymer	*'Polymer' means a substance consisting of molecules characterised by the sequence of one or more types of monomer units. Such molecules must be distributed over a range of molecular weights wherein differences in the molecular weight are primarily attributable to differences in the number of monomer units. A polymer comprises the following: (a) a simple weight majority of molecules containing at least three monomer units which are covalently bound to at least one other monomer unit or other reactant; (b) less than a simple weight majority of molecules of the same molecular weight. In the context of this definition, a 'monomer unit' means the reacted form of a monomer substance in a polymer, as defined in Regulation (EC) No 1907/2006*
ALL	Synthetic polymers	*'synthetic polymers' means macromolecular substances intentionally obtained either by:* *(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*

4. Definitions – Plastic-related

Updated

Definition

Microplastic

Current

ALL	Microplastic	*'microplastic' means 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*

Covered by new "*Synthetic polymer*" definition

ALL	Synthetic polymers	*'synthetic polymers' means macromolecular substances intentionally obtained either by:* *(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*

ALL	Microplastic (Synthetic polymer microparticles)	*'microplastic' means polymers that are solid and which fulfil both of the following conditions:* *a) are contained in particles and constitute at least 1 % by weight of those particles; or build a continuous surface coating on particles;* *b) at least 1 % by weight of the particles referred to in point (a) fulfil either of the following conditions*:* *i) all dimensions of the particles are equal to or less than 5 mm;* *ii) the length of the particles is equal to or less than 15 mm and their length to diameter ratio is greater than 3.* **Where the concentration of synthetic polymer microparticles covered by this entry cannot be determined by available analytical methods or accompanying documentation, in order to verify the compliance with the concentration limit referred to in paragraph 1, only the particles of at least the following size shall be taken into account:* *(a) 0,1 µm for any dimension, for particles where all dimensions are equal to or smaller than 5 mm;* *(b) 0,3 µm in length, for particles that have a length that is equal to or smaller than 15 mm and a length to diameter ratio greater than 3.* *The following polymers are excluded from this designation:* *a) polymers that are the result of a polymerisation process that has taken place in nature, independently of the process through which they have been extracted, which are not chemically modified substances;* *b) polymers that are degradable as proved in accordance with Appendix 15;* *c) polymers that have a solubility greater than 2 g/L as proved in accordance with Appendix 16;* *d) polymers that do not contain carbon atoms in their chemical structure."*

Overall, increase in accuracy and completeness

BUT

also in the length and (potentially) its complexity

4. Definitions – Nanomaterial

***Drivers** for the change - legislative developments & improvement of criteria interpretation and enforcement*

***Alignment** with Commission Recommendation of 10 June 2022 on the definition of nanomaterial (C/2022/3689).*

Updated

Definition

Nanomaterial

ALL	Nanomaterial	*'nanomaterial' means a natural, incidental or manufactured material ~~containing~~ consisting of solid particles that are present, either on their own or as identifiable constituent particles in ~~an unbound state or as an~~ aggregates or ~~as an~~ agglomerates, and where~~, for~~ 50 % or more of these particles in the number-based size distribution fulfil at least one of the following conditions:~~; one or more external dimensions is in the size range 1-100 nm~~* *(a) one or more external dimensions of the particle are in the size range 1 nm to 100 nm;* *(b) the particle has an elongated shape, such as a rod, fibre or tube, where two external dimensions are smaller than 1 nm and the other dimension is larger than 100 nm;* *(c) the particle has a plate-like shape, where one external dimension is smaller than 1 nm and the other dimensions are larger than 100 nm.* *In the determination of the particle number-based size distribution, particles with at least two orthogonal external dimensions larger than 100 µm need not be considered.* *However, a material with a specific surface area by volume of < 6 m^2/cm^3 shall not be considered a nanomaterial.*

4. Definitions – “Endocrine disruptors”

***Drivers** for the change – **Alignment** with latest EU Commission recommendation on the definition of nanomaterial (C/2022/3689).*

New

Definition
Substances identified to have endocrine disrupting properties

ALL	Substances identified to have endocrine disrupting properties (endocrine distruptors)	*‘substances identified to have endocrine disrupting properties’, also referred to as endocrine distruptors, means substances which have been identified to have endocrine disrupting properties (human health and/or environment) according to Article 57(f) of Regulation (EC) No 1907/2006 (candidate list of substances of very high concern for authorisation), or Regulation (EU) No 528/2012 of the European Parliament and of the Council or Regulation (EC) No 1107/2009 of the European Parliament and of the Council , or Regulation (EC) No 1272/2008 of the European Parliament and of the Council.*

4. Definitions – Questions

Points for discussion 5 – Definitions

Stakeholders are invited to reply the following consultation question:

- Question 6 (**Q6 – Ingoing substances)** – Do support the proposed definition? In particular, a) do you support the thresholds mentioned and; b) is the wording used clear?
- Question 7 (**Q7 – Impurities)** – This definition is complementary to "*Ingoing substances* and aims to provide clarity in its interpretation. Do you support its addition (fit for purpose)? In particular, a) do you support the thresholds mentioned.
- Question 8 (**Q8 – Packaging)** – This definition is aligned with the revised PPWD (currently proposal for a Regulation) and aims to bring clarity to define what is considered as packaging (and what not) for the purposes of compliance with EUEL criteria for Detergents. Do you support its addition (fit for purpose)? In particular, a) would you reduce the level of detail of the definitions?; b) do you consider useful the clarification made on what is packaging/product formulation?
- Question 9 (**Q9 – Nanomaterials)** – Do you support the current proposal (alignment with latest EU Commission recommendation)? If not, please could you indicate: a) reasons against this alignment; b) whether you would you consider best to align with the definition in the EUEL criteria for Cosmetics?
- Question 10 (**Q10– Microplastics)** – This definition follows regulatory updates but also implied the addition of complementary terms as *"Polymers"* and *"Synthethic polymers"* All together, these definitions clarify very accurately what is considered as "*microplastics*" but also might imply further complexity in the interpretation. In this sense, do you support the proposed "*microplastics*" (and associated) definitions? If you do - which details should be in the legal text and which in the User manual (if any)? If you don't, - which would the definition you advocate for?

Questions / Comments?

European Commission

Revision of the EU Ecolabel criteria for
DETERGENT AND CLEANING PRODUCTS

BREAK (15')

ETIQUETTE FOR VIRTUAL MEETING PARTICIPANTS

- **Please indicate "NAME OF YOUR ORGANIZATION + YOUR FULL NAME"**
- **MUTE YOUR MIC AND SWITCH OFF you CAMERA (unless you have the floor)**
- **USE THE CHAT only to ask for the FLOOR (write "FLOOR" in the chat), and COMMENT only ORALLY**

Agenda

Day 1: Tuesday 12th March 2024

		SCHEDULE
1.	Opening of virtual room, welcome of participants and introductions	09:00 – 09:15
2.	Political objectives of the EU Ecolabel and process description	09:15 – 09:30
3.	Preliminary background (PR) information (e.g. market analysis, LCA screening studies)	09:30 – 10:00
4.	Scope and definitions	10:00 – 11:30
	Break (15 min)	11:30 – 11:45
5.	EU Ecolabel criteria for detergents - Revision of criteria and discussion: Assessment and verification + Reference dosage **+ Criterion: "*Dosage requirements*".**	11:45 – 12:15
6.	EU Ecolabel criteria for detergents - Revision of criteria and discussion: Criterion: **"***Toxicity to aquatic organisms***" +** Criterion: **"***Biodegradability***"**	12:15 – 13:30
	Lunch break (1 hour)	13:30 – 14:30
7.	EU Ecolabel criteria for detergents – Criterion "Sustainable sourcing of raw materials"	14:30 – 15:00
8.	EU Ecolabel criteria for detergents – Criterion "Excluded and **Restricted substances"** [Part 1 of 2; targeting sub-criterions (a), (b), (c) and (d)]	15:00 – 17:00

European Commission

5. Assessment and verification
Reference dosage
Criterion: “Dosage requirements

European Commission

5. Assessment and verification

(a) Requirements

Most changes aimed at **increasing clarity/interpretation.**
Aligned with other EUEL criteria

Achieved via new text (e.g.)

Or via wording improvement (e.g.)

(b) Measurement thresholds;

Wording improvement

(*1) 'no limit' means: regardless of the concentration (analytical limit of detection) for all ~~ingoing~~ substances with the exception of ~~by-products and~~ impurities ~~from raw materials~~, which can be present up to a concentration of 0,010 % by weight in the final formulation

N/A not applicable

(c) Product group specifities

Unchanged

	The EU Ecolabel criteria target the best detergent and cleaning products on the market, in terms of environmental performance. The criteria focus on the main environmental impacts associated with the life cycle of these products and promote circular economy aspects." **(a) Requirements**
ALL	For the EU Ecolabel to be awarded to a specific product, the product shall comply with each requirement. The applicant shall provide a written confirmation stating that all the criteria are fulfilled. ~~The s~~Specific assessment and verification requirements are indicated within each criterion. Where the applicant is required to provide ~~to competent bodies with~~ declarations, documentation, analyses, test reports, or other evidence to show compliance with the criteria, these may originate from the applicant, his/her supplier(s) and/or their supplier(s), as appropriate. Competent bodies shall preferentially recognise attestations which are issued by bodies accredited in accordance with the relevant harmonised standard for testing and calibration laboratories and verifications by bodies that are accredited in accordance with the relevant harmonised standard for bodies certifying products, processes and services. ~~Accreditation shall be carried out in accordance with Regulation (EC) No 765/2008 of the European Parliament and of the Council[51].~~ Where appropriate, test methods other than those indicated for each criterion may be used if the competent body assessing the application accepts their equivalence. Where appropriate, competent bodies may require supporting documentation and may carry out independent verifications or site ~~visits~~ inspections to check compliance with these criteria. Changes in suppliers and production sites pertaining to products to which the EU Ecolabel has been granted shall be notified to competent bodies, together with supporting information to enable verification of continued compliance with the criteria. As a prerequisite, the product shall meet all applicable legal requirements of the country or countries in which the product is intended to be placed on the market. The applicant shall declare the product's compliance with this requirement. The 'Detergent ingredient database' list (DID list), available on the EU Ecolabel website, contains the most widely used ingoing substances in detergents and cosmetics formulations. It shall be used for deriving the data for the calculations of the critical dilution volume (CDV) and for the assessment of the biodegradability of the ingoing substances. For substances not present on the DID list, guidance is given on how to calculate or extrapolate the relevant data. The latest version of the DID list is available from the EU Ecolabel website (1) or via the websites of the individual competent bodies. The list of all ingoing substances shall be provided to the competent body, indicating the trade name (if existing), the chemical name, the CAS No, the DID No (2) (if existing), ~~the ingoing quantity, the~~ its function, ~~and the~~ form and concentration in mass percentage ~~present~~ regardless of concentration in the final product formulation ~~(including water-soluble foil, if used)~~. ~~Preservatives, fragrances and colouring agents shall be indicated regardless of concentration. Other ingoing substances shall be indicated at or above the concentration of 0,010 % weight by weight.~~ All ingoing substances present in the form of nanomaterials shall be clearly indicated ~~in~~ on the list with the word 'nano' written in brackets. For each ingoing substance listed, the safety data sheets (SDSs) in accordance with Regulation (EC) No 1907/2006 of the European Parliament and of the Council[52] shall be provided. Where an SDS is not available for a single substance because it is part of a mixture, the applicant shall provide the SDS of the mixture. Notes: [1] https://circabc.europa.eu/rest/download/933af4c0-1eda-4467-8b4d-22c9e0236bc1?ticket= [2] DID No is the number of the ingoing substance on the DID list.

Few changes related to additional requirements

European Commission

5. Reference dosage

Majorly unchanged except for DD (updated to EN60436:2020**)**

DD	Dishwasher detergent	Highest dosage recommended by the manufacturer to wash 12 normally soiled place settings under standard conditions ('wash'), as laid down in EN 60436:2020 ~~EN 50242~~ (indicated in g/wash or ml/wash).
	Rinse aid	3 ml/wash

No changes in recommended dosage found from EN 50242 to EN 60436.

5. EU Ecolabel criteria structure (I)

Criterion	LD	IILD	DD	IIDD	HSC	HDD
1	Dosage requirement	Toxicity to aquatic organisms	Dosage requirement	Toxicity to aquatic organisms	Toxicity to aquatic organisms	Toxicity to aquatic organisms
2	Toxicity to aquatic organisms	Biodegradability	Toxicity to aquatic organisms	Biodegradability	Biodegradability	Biodegradability
3	Biodegradability	Sustainable sourcing of palm oil, etc.	Biodegradability	Sustainable sourcing of palm oil, etc.	Sustainable sourcing of palm oil, etc.	Sustainable sourcing of palm oil, etc.
4	Sustainable sourcing of palm oil, etc.	Restricted substances	Sustainable sourcing of palm oil, etc.	Restricted substances	Restricted substances	Restricted substances
5	Restricted substances	Packaging	Restricted substances	Packaging	Packaging	Packaging
6	Packaging	Fitness for use	Packaging	Fitness for use	Fitness for use	Fitness for use
7	Fitness for use	Automatic dosing systems	Fitness for use	Automatic dosing systems	User information	User information
8	User information	User information	User information	User information	Information on EU Ecolabel	Information on EU Ecolabel
9	Information on EU Ecolabel	Information on EU Ecolabel	Information on EU Ecolabel	Information on EU Ecolabel	n.a.	n.a.

European Commission, Joint Research Centre, Boyano, A.; Kaps, R.; Medyna, G.; Wolf, O, 2016. Revision of six EU Ecolabel criteria for detergents and cleaning products. Final Technical Report. Available at https://susproc.jrc.ec.europa.eu/product-bureau/sites/default/files/contentype/product_group_documents/1581681262/Technical%20background%20report.pdf

5. EU Ecolabel sub-criteria structure (II)

Criterion	Sub-criterion
Excluded and restricted substances	Specified excluded and restricted substances
	Hazardous substances
	Substances of very high concern (SVHCs)
	Fragrances
	Preservatives
	Colouring agents
	Enzymes
	Corrosive properties (Only for HDD)
	Micro-organisms (Only for HSC)
Packaging	*(New) Recycled materials content*
	Weight/Utility ration (WUR)
	Design for recycling
	Products sold in spray bottles (Only for HSC)
	Packaging take-back systems (Only for HSC, IIDD, IILD)

5. EU Ecolabel criteria - changes (III)

Criterion number			Criterion
LD; DD	IILD; IIDD	IILD; IIDD	
1	NA	NA	Dosage requirements
2	1	1	Toxicity to aquatic organisms
3	2	2	Biodegradability
4	3	3	Sustainable sourcing of palm oil, palm kernel oil and their derivatives
5	4	4	Excluded and restricted substances
6	5	5	Packaging
7	6	6	Fitness for use
NA	NA	7	Automatic dosage system
8	7	8	User information
9	8	9	Information appearing on the EU Ecolabel

The proposal made is the best given available evidences but still information/data gathering of inputs is ongoing, as well as data processing (e.g. focused questionnaire). Hence, further changes are envisaged.

5. Criterion - Dosage requirements [DD; LD]

Changes overview:
Stricter thresholds.

Main streams of evidences:
- Literature (industry)
- Focused questionnaire;
  Other ecolabels;

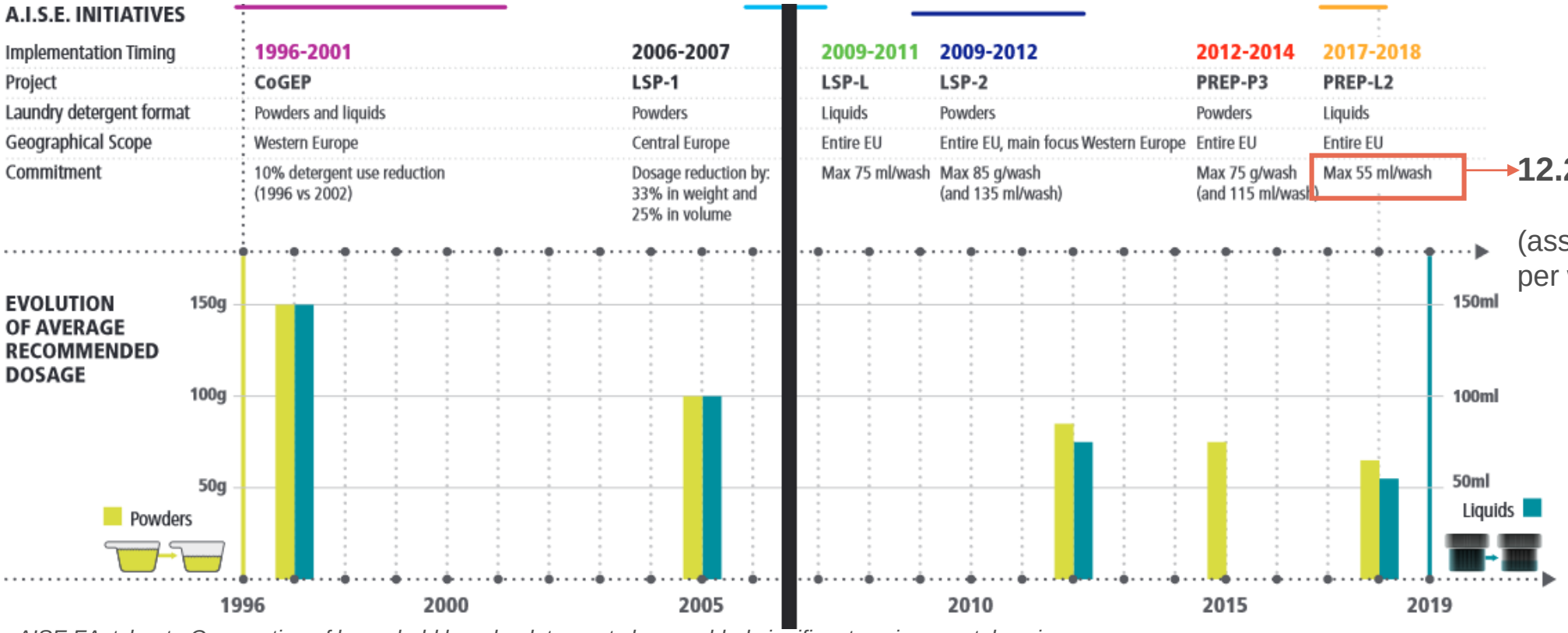
Limitations:
granularity of information accessed (e.g. product formats)

Data wanted!

DD, LD	The reference dosage shall not exceed the following amounts:
DD	**Product type** / **Dosage (g/wash)** Single-function dishwasher detergent: ~~19,0~~ 16.0 Multi-function dishwasher detergent: ~~21,0~~ 18.0 Rinse aids are exempted from this requirement.
LD	**Product type** / **Dosage (g/kg of laundry)** Heavy-duty detergent, colour-safe detergent: ~~16,0~~ 12.2 Light-duty detergent: ~~16,0~~ 12.2 Stain remover (pre-treatment only): 2,7
DD, LD	*Assessment and verification:* the applicant shall provide the product label that includes the dosing instructions and documentation showing the density (g/ml) of liquid and gel products.

5. Criterion - Dosage requirements [DD; LD]

Literature (industry)



12.2 mL /kg laundry

(assuming 4.5 kg laundry per wash)

AISE FActsheet - Compaction of household laundry detergents has enabled significant environmental savings.
https://www.aise.eu/documents/document/20190410111600-aise_factsheet-2019_compaction_def.pdf

European Commission

5. Criterion - Dosage requirements [DD; LD]

Focused questionnaire (industry)

- *3.1) Could you provide data on the dosage requirements of your EU Ecolabelled products? Please report by product group and/or by product categories.*
- *3.2) Could you provide data/information on the recommended dosage (or typical range) by the manufacturer for non-EU Ecolabelled products? Please restrict to LD, DD, IIDD, IILD, HDD & HSC and/or their product categories but including any format type (e.g. pods/tablets/capsules/sheets).*

Type of product	LD (min – max; g/kg laundry)	DD (min – max; g/kg laundry)
Ecolabelled	6.1 - 16	15 - 18
Non-Ecolabelled	6.7 – 22	16 – 25

Product type	Dosage (g/kg of laundry)
Heavy-duty detergent, Colour-safe detergent	16.0
Light-duty detergent	16.0
Stain remover (pre-treatment only)	2.7

Product type	Dosage (g/wash)
Single-function dishwasher detergent	19.0
Multi-function dishwasher detergent	21.0

5. Criterion - Dosage requirements [DD; LD]

Other Ecolabels

LD

Product type NS	Water hardness	Dosage
Heavy-duty detergent (normally soiled)	5.5°dH	11.0 g/kg wash
Light-duty detergent (lightly soiled)	5.5°dH	11.0 g/kg wash
Stain-removers (in-wash)	all	4.5 g/kg wash
Stain-removers (pre-treatment)	all	2.7 ml/kg wash

14.3 g/kg for medium water hardness

Product type EUEL	Dosage (g/kg of laundry)
Heavy-duty detergent, Colour-safe detergent	16.0
Light-duty detergent	16.0
Stain remover (pre-treatment only)	2.7

DD

Product type NS	Dosage (g/wash)
Single function products	18.0
Multifunction products	20.0

Product type EUEL	Dosage (g/wash)
Single-function dishwasher detergent	19.0
Multi-function dishwasher detergent	21.0

Stringent limits in Nordic Ecolabeling

5. Criterion - Dosage requirements [DD; LD]

Points for discussion 6 – Dosage requirements

Stakeholders are invited to reply the following consultation question:

- Question 11 (**Q11**) – Do you support proposed thresholds? If not, why?
- Question 12 **(Q12)** – Should any additional product group/format be considered for addition? If so, why?

Data wanted! (e.g. **formulation**)

European Commission

Questions / Comments?

European Commission

6. Toxicity to aquatic organisms & Biodegradability

European Commission

6. Criterion – Toxicity to aquatic organisms

Product toxicity represented by the *Critical Dilution Volume* (***CDV***)
Amount of water required to dilute below harmful impact**.**

ALL	$$CDV_{chronic} = \sum CDV(i) = 1000 . \sum dosage(i) . \frac{DF(i)}{TF_{chronic}(i)}$$ Where: $dosage(i)$: weight (g) of the substance (i) in the reference dose; $DF(i)$: degradation factor for the substance (i); $TF_{chronic}(i)$: chronic toxicity factor for the substance (i);

- (Bio)degradability & Aquatic toxicity as key variables
- Based on Degradation (**DF**) and Toxicity (**TF**) factors (Chronic or Acute) of substances used.
- The Detergent Ingredient Database (DID) list as main database to source data for CDV calculation

6. Criterion – Toxicity to aquatic organisms

Changes overview:

- **Stricter thresholds** (except for HSC).
- Wording improvement
- Exclusion of abrasives

Main streams of evidences:

- Focused questionnaire;
- Other ecolabels;

Limitations:

- Data access (e.g. CDV and/or formulation).
- Full data processing
- Access to comparable data (e.g. HSC)

IILD	— ε-phthalimido-peroxy-hexanoic acid (PAP) — to be included in the calculation as ε-phthalimido hexanoic acid (PAC). The values to be used to calculate the CDV[$_{chronic}$] for ~~ε-phthalimido hexanoic acid (~~PAC~~)~~ shall be as follows: $DF(i)$= 0,05

DD, HDD, IIDD, IILD, ~~LD~~	The $CDV_{chronic}$ is calculated for all ingoing substances (i) in the product, except abrasive substances, using the following equation:
LD, HSC	The $CDV_{chronic}$ is calculated for all ingoing substances (i) in the product, except abrasive substances and micro-organisms, using the following equation: *Related to proposed scope change*

Data wanted! (e.g. **CDV; formulation**)

Proposals to be refined

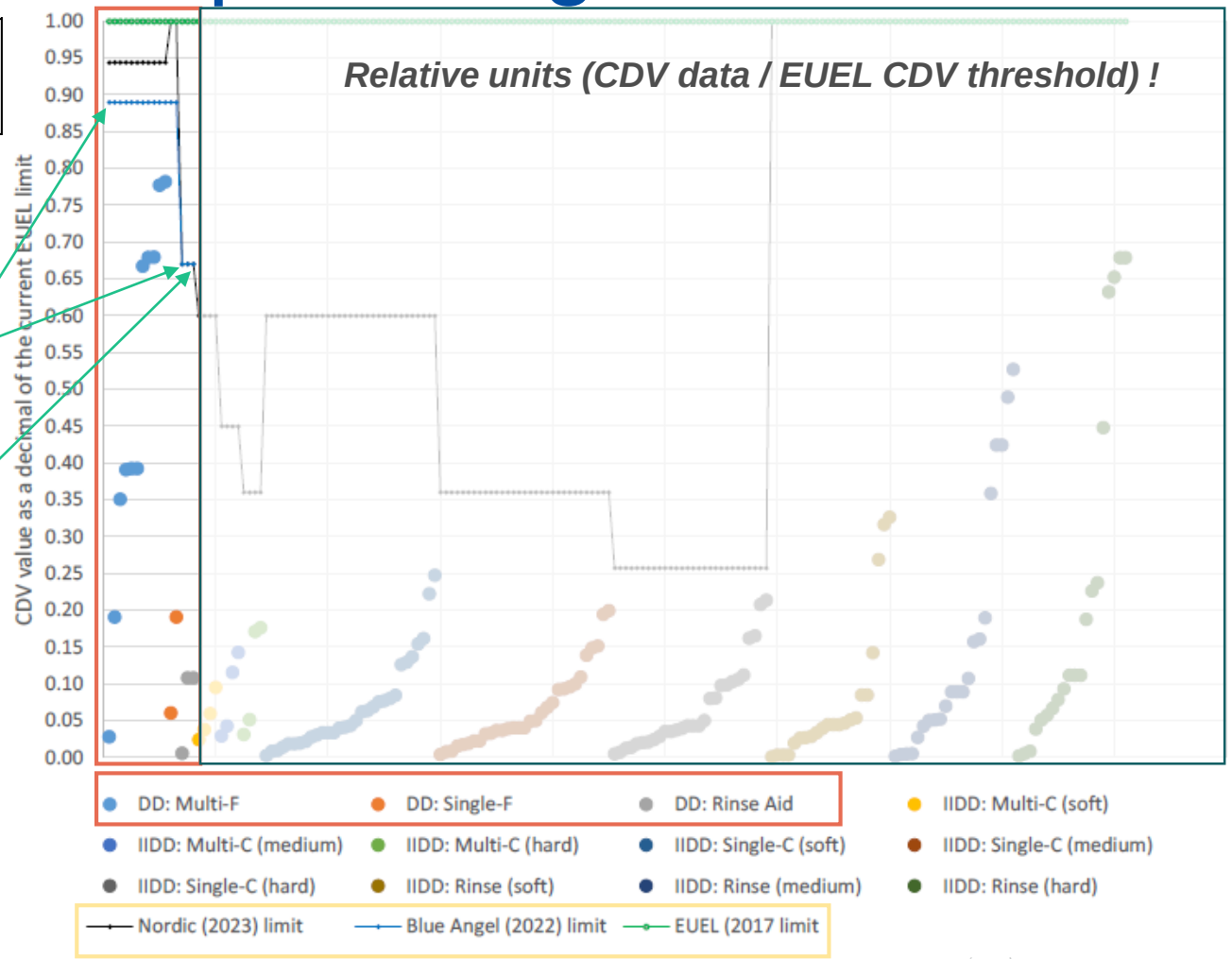
European Commission

6. Criterion – Toxicity to aquatic organisms

	Product type	Limit CDV (l/wash)
DD	Single-function dishwasher detergents	~~22 500~~ 20000
	Multi-function dishwasher detergents	~~27 000~~ 24000
	Rinse aid	~~7 500~~ 5000

Available data confirmed “room” for setting stricter limits

- *Single-function* -> alignment with BA at 24000
- *Multi-function* -> alignment with BA at 20000
- *Rinse aid* -> alignment with BA & NS at 5000



Remarks:

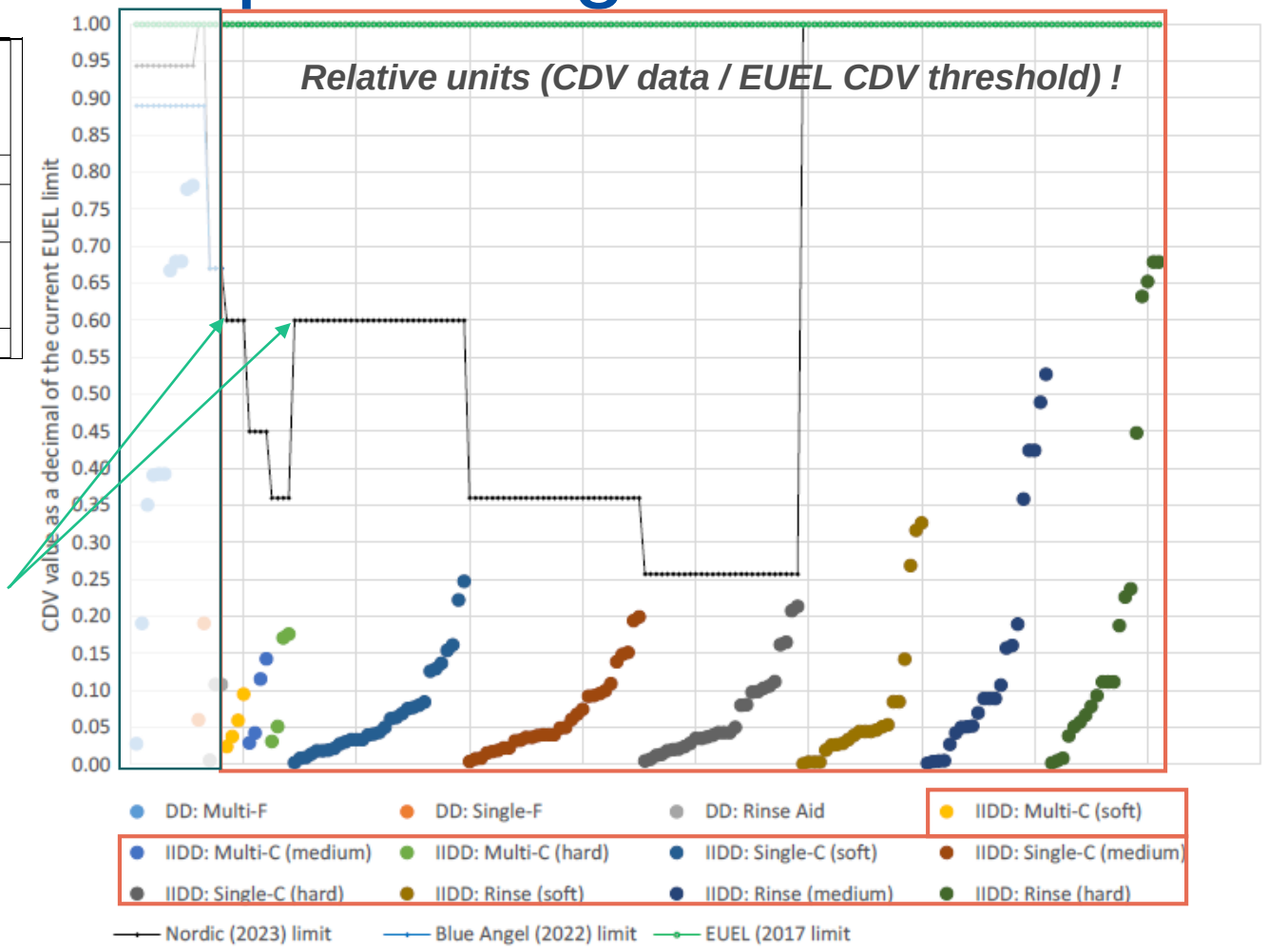
Few data points!

Data wanted! (e.g. **CDV; formulation**)

European Commission

6. Criterion – Toxicity to aquatic organisms

	Water hardness Product type	Soft (< 1,5 mmol $CaCO_3$/l) (l/l of washing solution)	Medium (1,5-2,5 mmol $CaCO_3$/l) (l/l of washing solution)	Hard (> 2,5 mmol $CaCO_3$/l) (l/l of washing solution
IIDD	**Pre-soaks**	2 000	2 000	2 000
	Dishwasher detergents	~~3 000~~ 1800	~~4 000~~ 3000	~~5 000~~4200
	Multi-component systems	~~3 000~~ 1800	~~4 000~~ 2400	~~5 000~~3000
	Rinse aids	3 000	3 000	3 000



Available data confirmed “room” for setting stricter limits

- *Single-*& Multi-*component* > alignment with NS at 1800 for soft water (increasing proportionately medium and hard water)
- *Rinse aid* -> unchanged (but, 45% [CDV 1650’] feasible?)

Remarks:

Few data points! (multi-component)

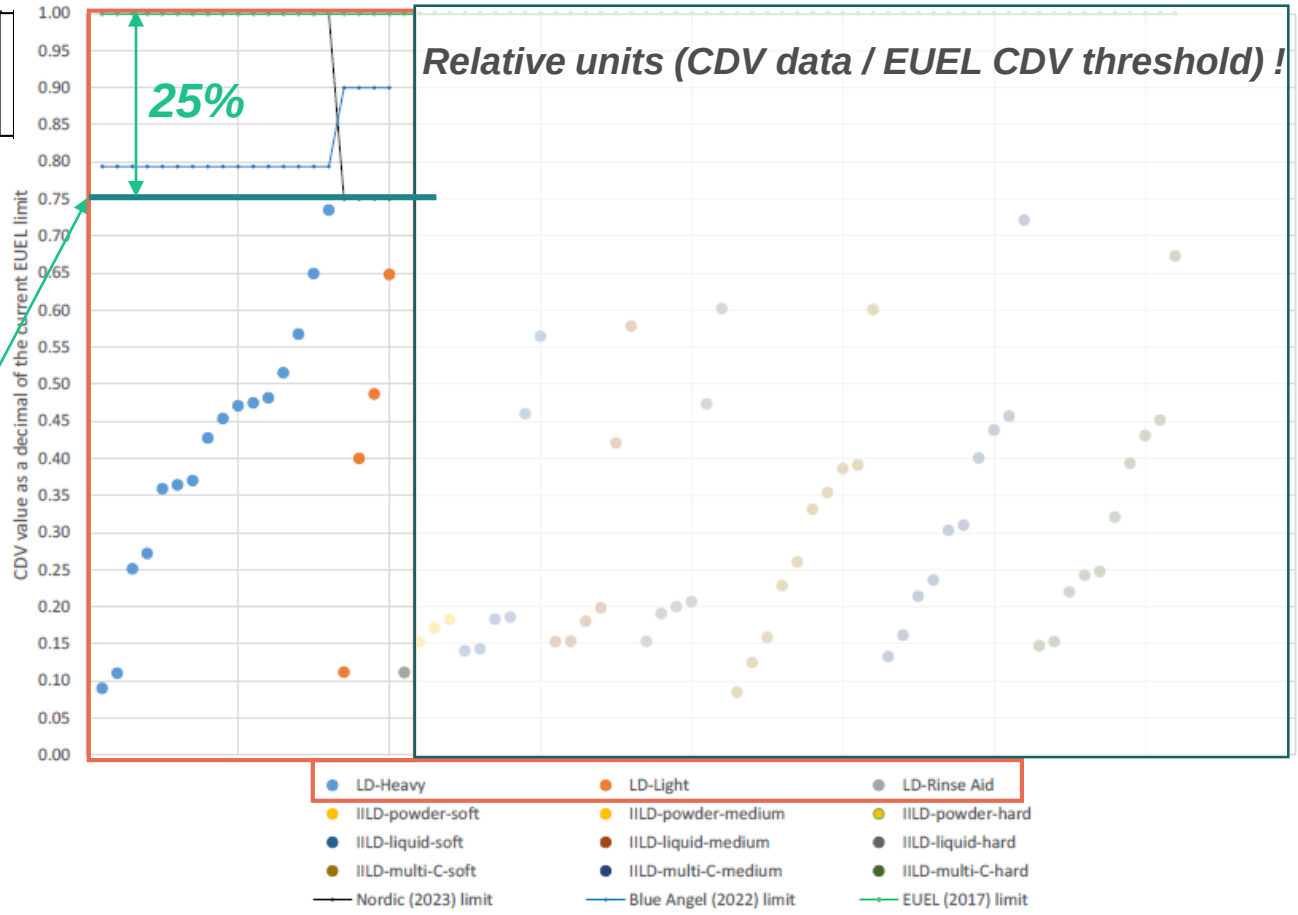
European Commission

6. Criterion – Toxicity to aquatic organisms

	Product type	Limit CDV (l/kg of laundry)
LD	Heavy-duty detergent, colour-safe detergent	~~31 500~~ 23625
	Light-duty detergent	~~20 000~~ 15000
	Stain remover (pre-treatment only)	3 500

Available data confirmed “room” for setting stricter limits

- *Heavy-duty / colour safer detergent + Light duty detergent* -> Other Ecolabel + data shown feasibility of decreasing 25%
- *Rinse aid* -> unchanged (but, 45% [CDV 1650’] feasible?)



Remarks:

Few data points! (rinse aid; light)

European Commission

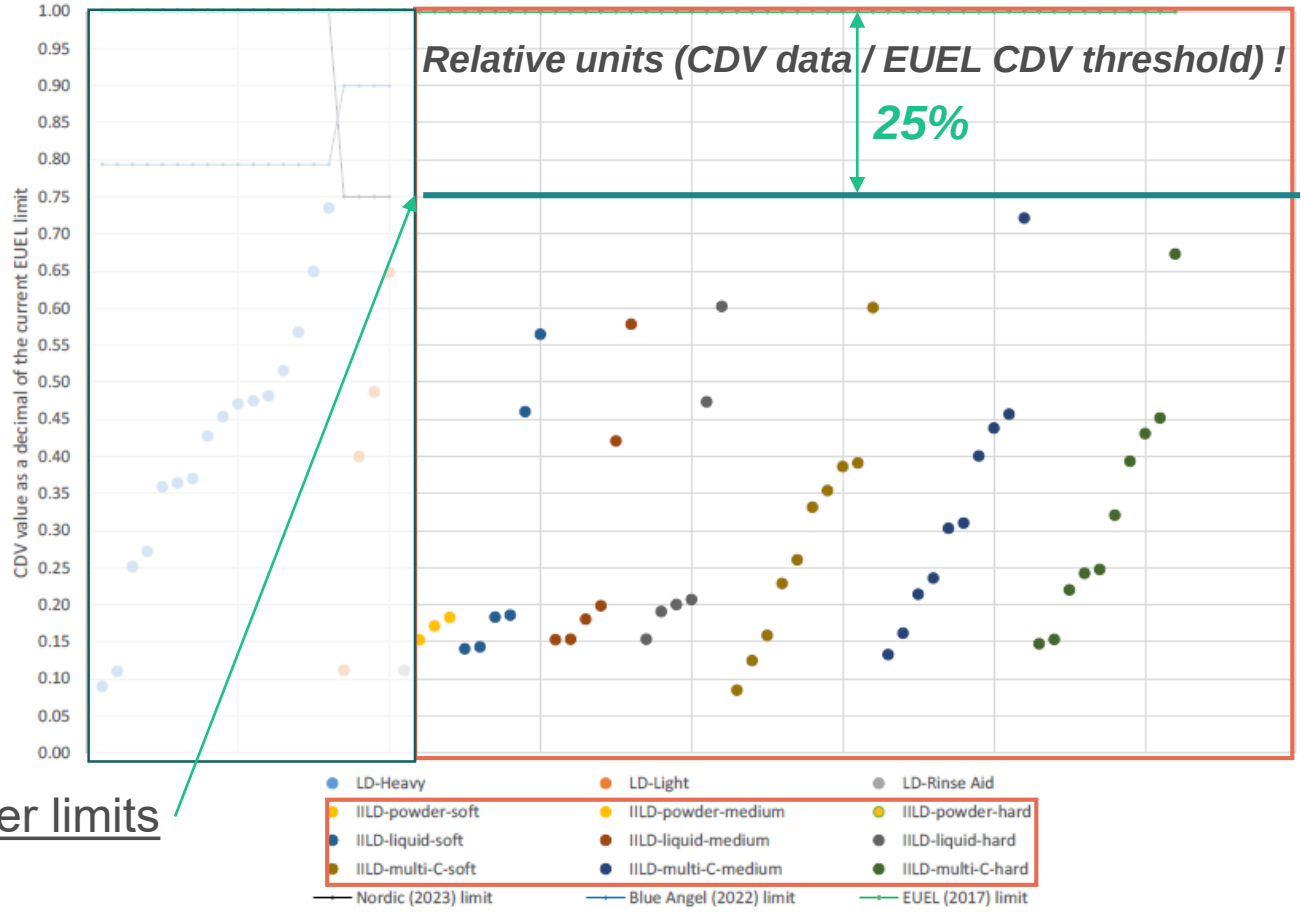
6. Criterion – Toxicity to aquatic organisms

IILD

Soft water (< 1,5 mmol $CaCO_3$/l) (l/kg of laundry)			
Degree of soiling / Product type	**Light**	**Medium**	**Heavy**
Powder	~~30 000~~ 22500	~~40 000~~ 30000	~~50 000~~ 37500
Liquid	~~50 000~~ 37500	~~60 000~~ 45000	~~70 000~~ 52500
Multi-component system	~~50 000~~ 37500	~~70 000~~ 52500	90 000

Medium water (< 1,5-2,5 mmol $CaCO_3$/l) (l/kg of laundry)			
Degree of soiling / Product type	**Light**	**Medium**	**Heavy**
Powder	~~40 000~~ 30000	~~60 000~~ 45000	~~80 000~~ 60000
Liquid	~~60 000~~ 45000	~~75 000~~ 56250	~~90 000~~ 67500
Multi-component system	~~60 000~~ 45000	~~80 000~~ 60000	~~100 000~~ 75000

~~Soft~~ Hard water (> 2,5 mmol $CaCO_3$/l) (l/kg of laundry)			
Degree of soiling / Product type	**Light**	**Medium**	**Heavy**
Powder	~~50 000~~ 37500	~~75 000~~ 56250	~~90 000~~ 67500
Liquid	~~75 000~~ 56250	~~90 000~~ 67500	~~120 000~~ 90000
Multi-component system	~~75 000~~ 56250	~~100 000~~ 75000	~~120 000~~ 90000



Available data confirmed “room” for setting stricter limits

Remarks:

Assumed normal degree soiling

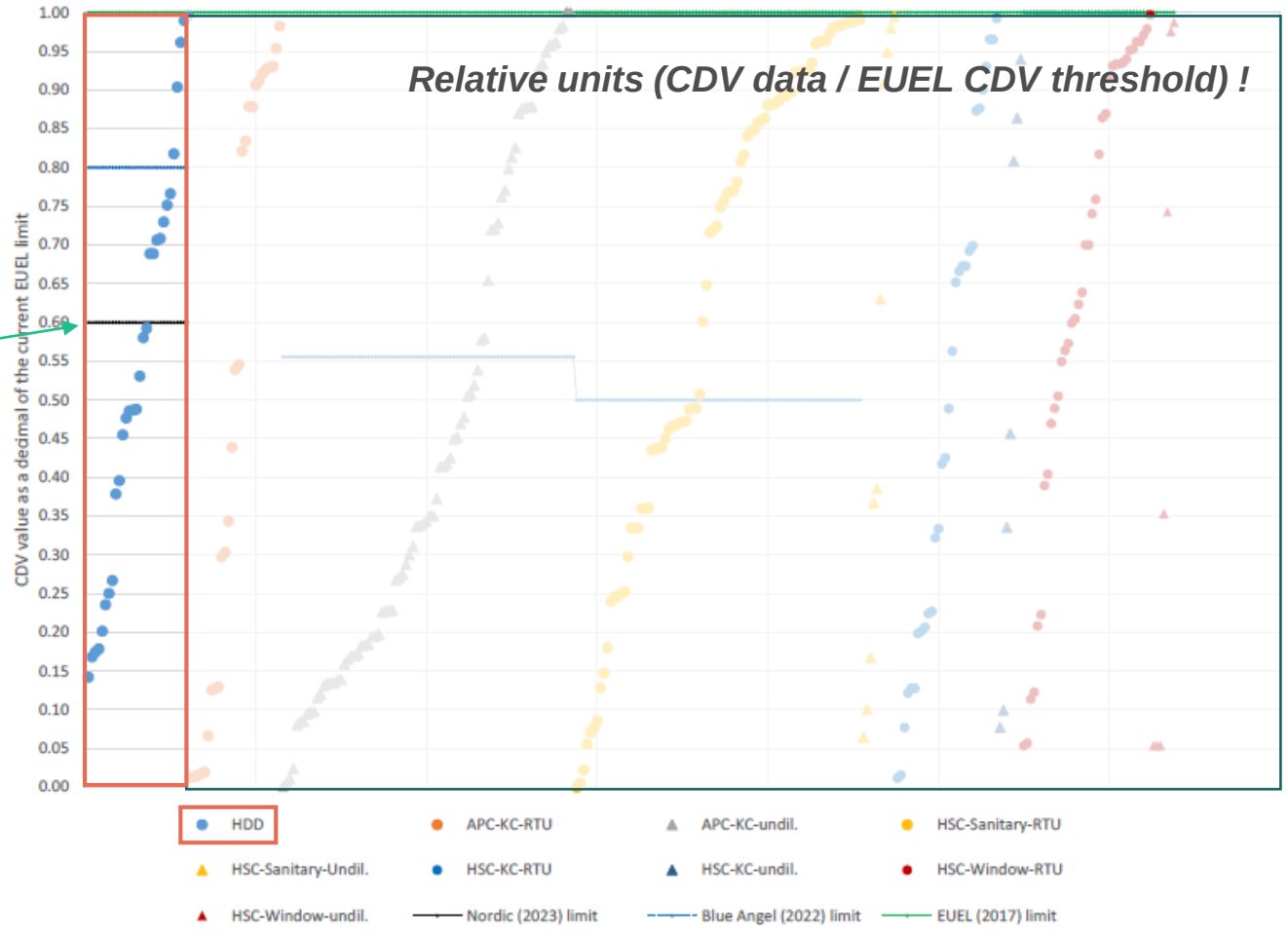
European Commission

6. Criterion – Toxicity to aquatic organisms

	Product type	Limit CDV (l/l of washing water)
HDD	Hand dishwashing detergents	~~2 500~~ 1500

Available data confirmed “room” for setting stricter limits

- Alignment with NS at 1500

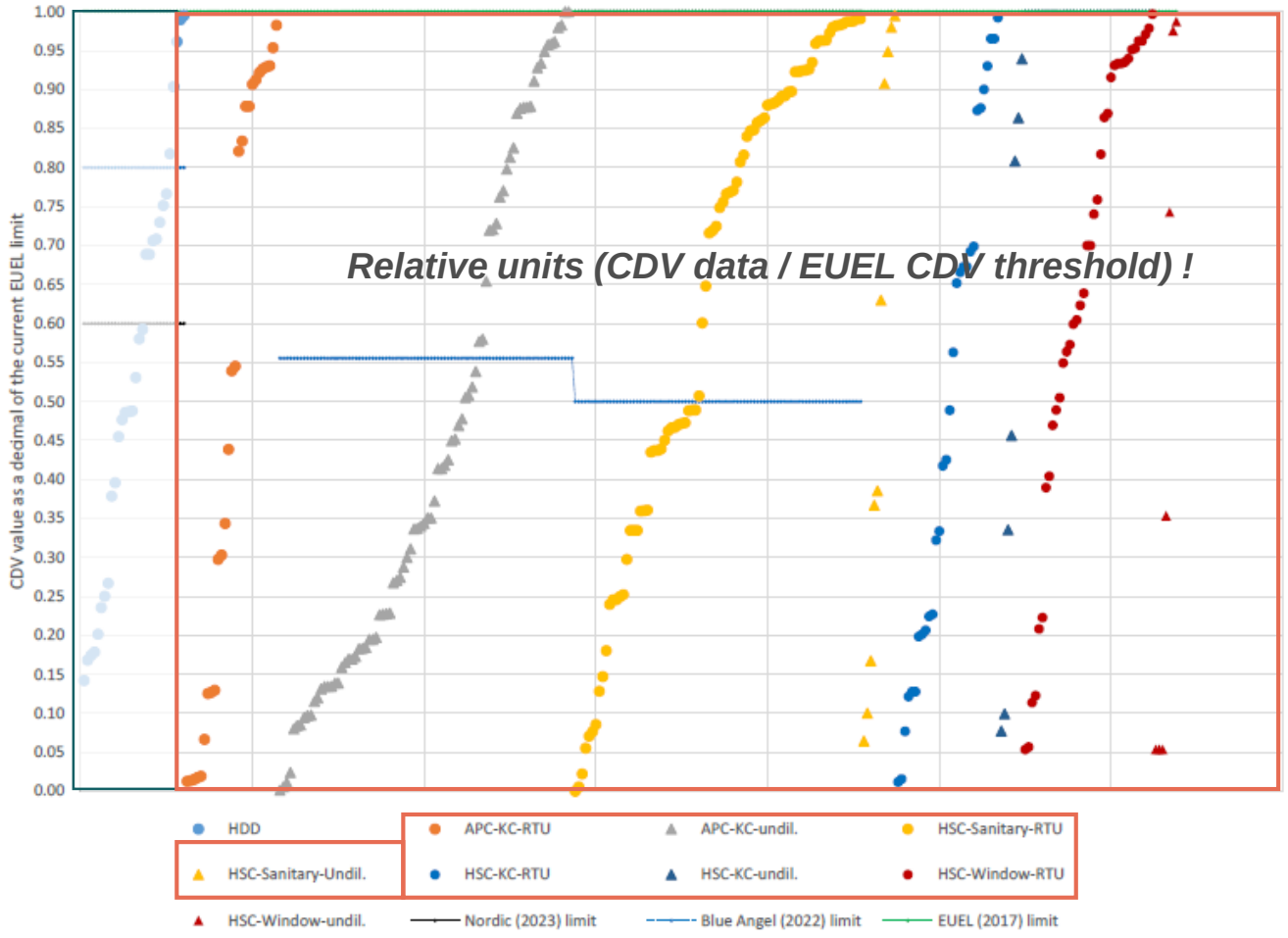


Remarks:

European Commission

6. Criterion – Toxicity to aquatic organisms

	Product type	Limit CDV (l/l of cleaning solution)
HSC	All-purpose cleaners, RTU	350 000
	All-purpose cleaners, undiluted	18 000
	Kitchen cleaners, RTU	600 000
	Kitchen cleaners, undiluted	45 000
	Window cleaners, RTU	48 000
	Window cleaners, undiluted	18 000
	Sanitary cleaners, RTU	600 000
	Sanitary cleaners, undiluted	45 000



Further evidences required

Remarks:

No clear pattern extracted from data.

No direct comparison with NS & BA (different naming).

European Commission

6. Criterion – Toxicity to aquatic organisms

Points for discussion 7 – Critical Dilution Volume limits

Stakeholders are invited to reply the following consultation questions:

Data wanted! (e.g. **CDV**; **formulation**)

- Question 13 (**Q13**) – Do you support the exclusion of abrasives from CDV calculation, as expressed in criterion legal text? If not but still supporting this exclusion, should it be aligned with EUEL criteria for Cosmetic products (use Active Content –AC)?
- Question 14 (**Q14**) – Can you provide CDV value data to help support the criteria revision process and make sure that new CDV values have an appropriate level of ambition?
- Question 15 (**Q15**) – Would you support reducing the CDV threshold for DD single-function to 18000 g/wash?
- Question 16 (**Q16**) – Would you support reducing the CDV threshold for DD rinse aid products to 1650 l/l washing solution?
- Question 17 (**Q17**) – Would you support proposed IILD limits? In addition, would you support a simplification of the criterion? If so, why/how (e.g. not differentiating by water hardness)?
- Question 18 (**Q18**) – Would you support aligning with Blue Angel with regards to HSC CDV toxicity limits? In addition, do you have any specific proposal for revision of each of the HSC products sub-groups?
- Question 19 (**Q19**) – Do you think the EUEL limits for CDV should continue to be nuanced for dosages for soft, medium and hard water? And does this answer vary depending on whether referring to household or industrial and institutional products?

6. Criterion – Biodegradability

The magnitude of product impact on the (aquatic) environment (either directly emitted or after WWT) results from the toxicity x persistence of its components.

The criterion *Biodegradability* aims to decrease potential detrimental impacts via maximizing and/or ensuring that detergent and cleaning products ingredients are (bio)degradable.

Surfactants are key ingredients which could have poor (bio)degradability under (an)aerobic conditions.

ALL	**(a) *Biodegradability of surfactants*** All surfactants shall be readily degradable (aerobically). All surfactants classified as hazardous to the aquatic environment: Acute Category 1 (H400) or Chronic Category 3 (H412), in accordance with Regulation (EC) No 1272/2008 of the European Parliament and of the Council([66]) shall be in addition anaerobically biodegradable.

The potential impacts associated with **other non (bio)degradable organic substances (NBO)** is restricted, with thresholds set based on whether they are aerobically (**aNBO**) or anaerobically (**anNBO**) non-biodegradable.

DD, HDD, IIDD, IILD, LD	**(b) *Biodegradability of organic compounds*** The content of organic substances in the product that are aerobically non-biodegradable (not readily biodegradable, aNBO) or anaerobically non-biodegradable (anNBO) shall not exceed the following limits for the reference dosage:
HSC	**(b) *Biodegradability of organic compounds*** The content of organic substances in the product, except micro-organisms, that are aerobically non-biodegradable (not readily biodegradable, aNBO) or anaerobically non-biodegradable (anNBO) shall not exceed the following limits for the reference dosage.

European Commission

6. Criterion – Biodegradability

Changes overview:

- Requiring **WS foil** to be readily **biodegradable.**

ALL	For ingoing substances that are not included in Part A of 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 Part B of that list. Water-soluble foil/films (e.g., Polyvinyl Alcohol (PVA) films) shall be readily biodegradable according to test method OECD 301 A-F or 310, as reported in Part B of the DID list. In the absence of documentation for degradability described above, 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:

Main proposals to be refined

Remarks:

- Further **research** in this criterion **pending**.
- Keen to start discussion about the **ban of surfactants** that are anaerobically non-biodegradable.

Main streams of evidences:

- Other ecolabels;
- Literature (Industry reports);
- DID list (2016)

Limitations:

- Data access.
- Full data processing

Points for discussion 8 – Biodegradability

Stakeholders are invited to reply the following consultation questions:

— Question 20 (**Q20**) – Would you support aligning existing EUEL criteria with EUEL Cosmetics? It would imply the following addition to the text in existing criterion *Biodegradability* (*changes marked in blue font*): "All surfactants shall be readily ~~degradable (aerobically)~~ *biodegradable under aerobic conditions and biodegradable under anaerobic conditions*."

European Commission

6. Criterion – Biodegradability

Some arguments to prime discussion for a potential ban on surfactants that are anaerobically non-biodegradable

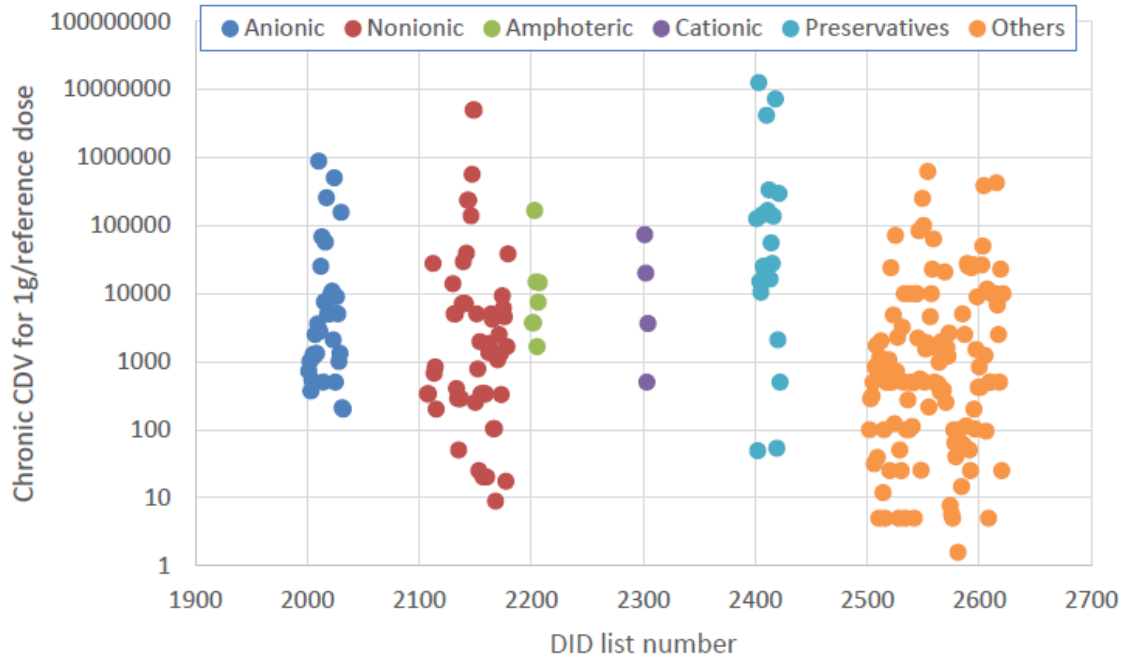
Other Ecolabels: require surfactants being aerobically and anaerobically biodegradable (difference in exceptions allowed). Also, EUEL Cosmetic has already adopted it.

Surfactants diversity: given the wide variety of surfactants types (ca 700 as listed by CESIO) it is expected to have a range of surfactants compatible with required biodegradabilities (and aquatic “toxicities”).

DID list (2016): the number of surfactants meeting aerobic AND anaerobic degradation criteria was:

- Anionic 10/32
- Non-ionic 26/54
- Amphoteric 4/7
- Cationic 1/4

Figure 40. Spread of CDV values for different surfactants, preservatives and other detergent ingredients on a logarithmic scale.



European Commission

6. Criterion – Biodegradability

Points for discussion 8 – Biodegradability

Stakeholders are invited to reply the following consultation questions:

— Question 20 (**Q20**) – Would you support aligning existing EUEL criteria with EUEL Cosmetics? It would imply the following addition to the text in existing criterion *Biodegradability* (*changes marked in blue font*): "All surfactants shall be readily ~~degradable (aerobically)~~ *biodegradable under aerobic conditions and biodegradable under anaerobic conditions*."

Questions / Comments?

European Commission

Revision of the EU Ecolabel criteria for
DETERGENT AND CLEANING PRODUCTS

LUNCH (1h)

ETIQUETTE FOR VIRTUAL MEETING PARTICIPANTS

- **Please indicate "NAME OF YOUR ORGANIZATION + YOUR FULL NAME"**
- **MUTE YOUR MIC AND SWITCH OFF you CAMERA (unless you have the floor)**
- **USE THE CHAT only to ask for the FLOOR (write "FLOOR" in the chat), and COMMENT only ORALLY**

Agenda

Day 1: Tuesday 12th March 2024

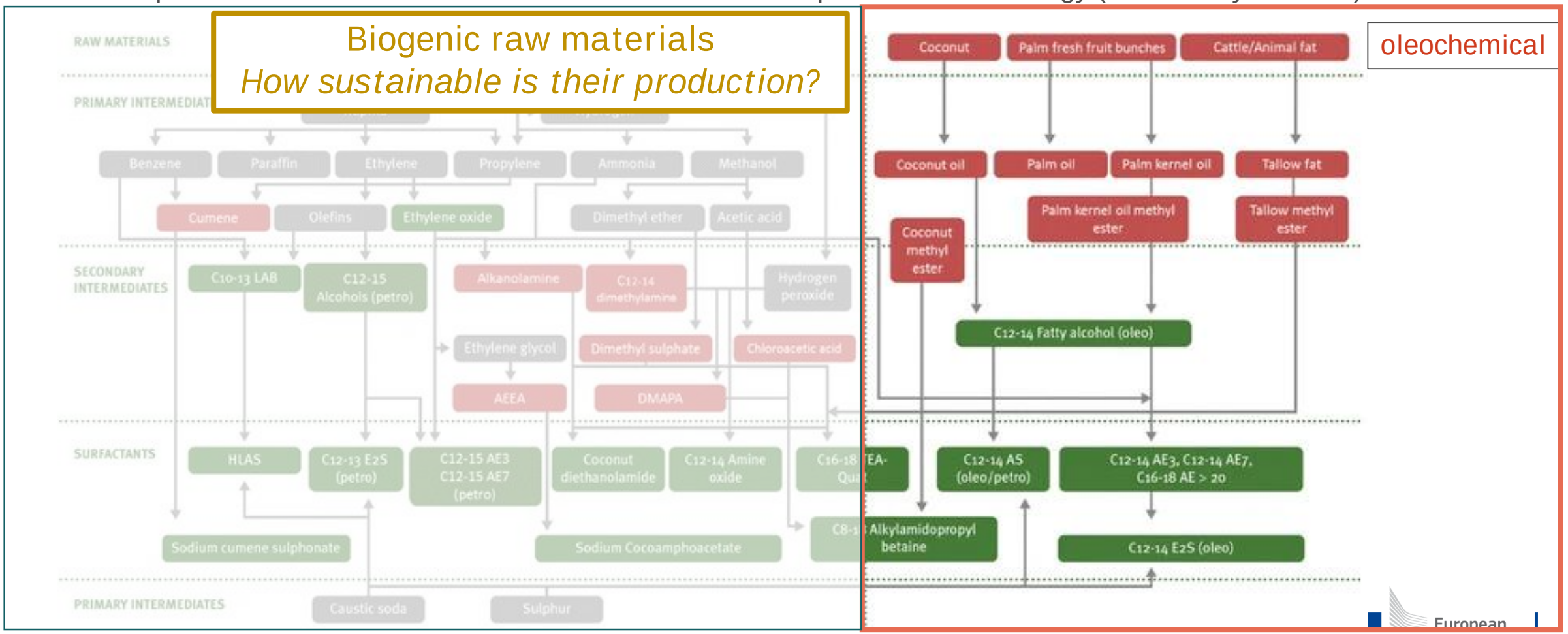
		SCHEDULE
1.	Opening of virtual room, welcome of participants and introductions	09:00 – 09:15
2.	Political objectives of the EU Ecolabel and process description	09:15 – 09:30
3.	Preliminary background (PR) information (e.g. market analysis, LCA screening studies)	09:30 – 10:00
4.	Scope and definitions	10:00 – 11:30
	Break (15 min)	11:30 – 11:45
5.	EU Ecolabel criteria for detergents - Revision of criteria and discussion: Assessment and verification + Reference dosage + **Criterion: "*Dosage requirements*".**	11:45 – 12:15
6.	EU Ecolabel criteria for detergents - Revision of criteria and discussion: Criterion: "*Toxicity to aquatic organisms*" + Criterion: "*Biodegradability*"	12:15 – 13:30
	Lunch break (1 hour)	13:30 – 14:30
7.	EU Ecolabel criteria for detergents – Criterion "Sustainable sourcing of raw materials"	14:30 – 15:00
8.	EU Ecolabel criteria for detergents – Criterion "Excluded and **Restricted substances"** [Part 1 of 2; targeting sub-criterions (a), (b), (c) and (d)]	15:00 – 17:00

European Commission

7. Criterion “Sustainable sourcing of raw materials”

7. Criterion – Sustainable sourcing of raw materials

Figure 35 – Overview of substances included in the production of commercially major surfactants and their main precursors/intermediates based on current surfactant production technology (reference year 2011).



Source: *Schowanek, D., T. Borsboom-Patel, A. Bouvy, J. Colling, J.A. de Ferrer, D. Eggers, K. Groenke, et al., 'VIP New and Updated Life Cycle Inventories for Surfactants Used in European Detergents: Summary of the ERASM Surfactant Life Cycle and Ecofootprinting Project', The International Journal of Life Cycle Assessment, Vol. 23, No. 4, April 2018, pp. 867–886. DOI 10.1007/s11367-017-1384-x*

7. Criterion – Sustainable sourcing of raw materials

Changes overview:

- **Name** changed
- **Alignment** with other **Ecolabels** (e.g. inclusion of **cut-off limit [1%])**
- **All renewable raw materials sustainably sourced** (RED III sustainability criteria)**.**
- Chain of custody – **book & claim excluded**

Main streams of evidences:

- Other ecolabels;
- Literature (various);
- Legislation;
- Focused questionnaire.

Remarks:

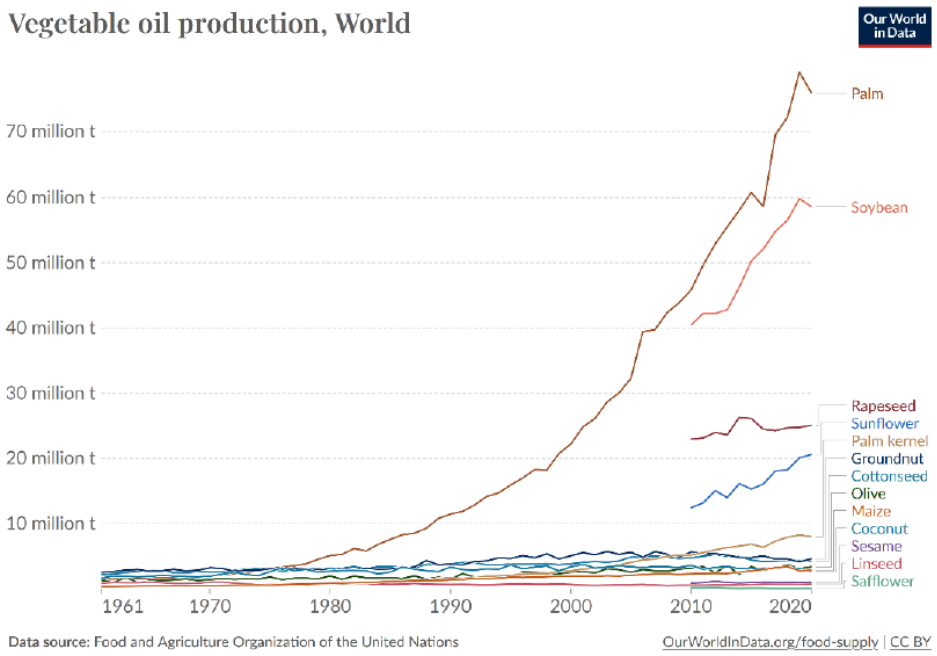
- Research made on criteria expansion to specifically refer to alternatives to palm oil (e.g. **coconut oil**) and inclusion or **organic production.**
- Proposed **exclusion of *mass balance*** as acceptable chain of custody model (to be discussed).

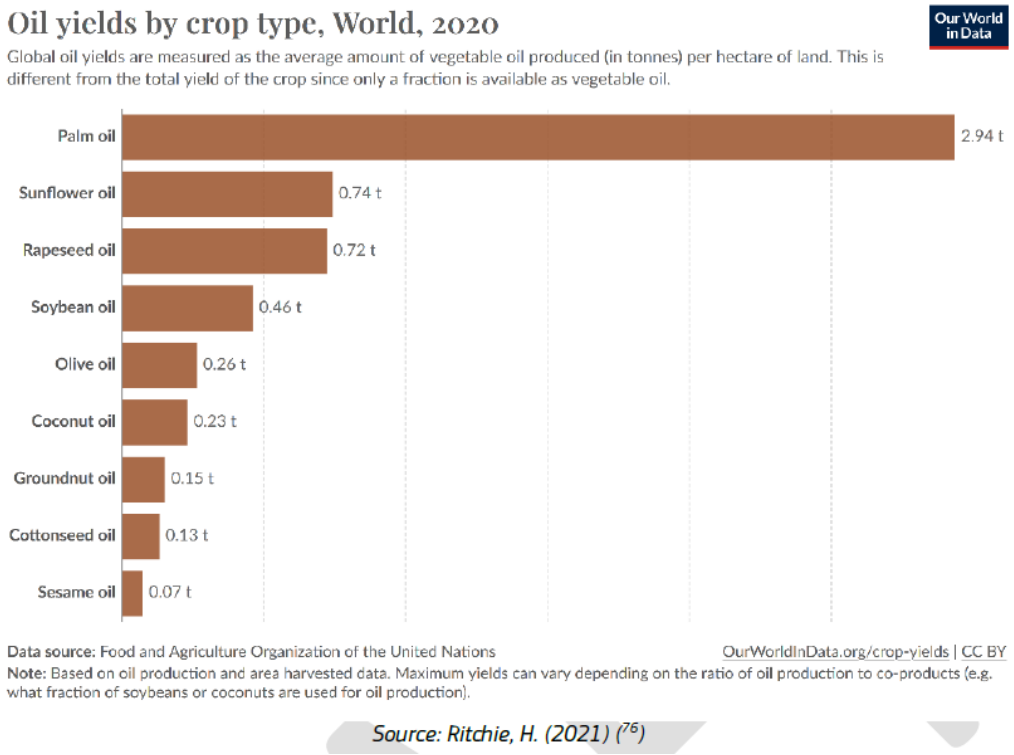
Proposed criterion (x) – Sustainable sourcing of raw materials ~~palm oil, palm kernel oil and their derivatives~~.	
ALL	The requirements does not include raw materials < 1% (w/w) in the final product a) Palm oil, palm kernel oil and their derivatives ~~Ingoing substances used in the products which are derived from palm oil or palm kernel oil shall be sourced from plantations that~~ 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 of a certification scheme for sustainable production that is based on multi-stakeholder organizations that has a broad membership, including NGOs, industry and government and that addresses environmental impacts including on soil, biodiversity, organic carbon stocks and conservation of natural resources. b) Other biobased raw materials than palm oil, palm kernel oil and their derivatives. Biobased raw materials used to produce ingredients included in the final product, shall be covered by chain of custody certificates issued by an independent third-party certification scheme officially recognised by the European Commission [1]
ALL	*Assessment and verification:* To demonstrate compliance, ~~The applicant shall provide~~ evidence through third-party ~~certificates and~~ chain of custody certificating that the raw materials ~~palm oil and palm kernel oil~~ used in the product or in its manufacturing ~~of the ingoing substances~~ originates from sustainably managed plantations shall be provided. The chain of custody certificates shall be valid for the whole duration of the EU Ecolabel license. Competent bodies shall check the certificates again twelve months after the awarding of the EU Ecolabel license. [2]. To demonstrate compliance with a): — For palm oil and palm kernel oil, ~~Certificates accepted shall include~~ Roundtable for Sustainable Palm Oil (RSPO) ~~(by identity preserved, segregated or mass balance)~~ or certificates of any equivalent or stricter sustainable production scheme~~.~~ demonstrating compliance to any of the following models shall be accepted~~:~~ identity preserved or segregated. — For palm oil and palm kernel oil derivatives, RSPO certificates or certificates of any equivalent or stricter sustainable production scheme demonstrating compliance to any of the following models shall be accepted: identity preserved, segregated, and mass balance. — For palm oil, palm kernel oil and their derivatives, a mass balance calculation and/or invoices/delivery notes from the raw material producer shall be provided, showing that the proportion of certified raw material corresponds to the amount of certified palm oil, palm kernel oil and/or their derivatives. Alternatively, a declaration from the producer of raw materials shall be provided, showing that all purchased palm oil, palm kernel oil and/or their derivatives are certified. ~~For chemical derivatives of palm oil and for palm kernel oil, it shall be acceptable to demonstrate sustainability through book and claim systems such as GreenPalm certificates or equivalent by providing the Annual Communications of Progress (ACOP) declared amounts of procured and redeemed GreenPalm certificates during the most recent annual trading period.~~ To demonstrate compliance with b): — For other biobased raw materials than palm oil, palm kernel oil and their derivatives, the applicant shall provide a declaration of compliance supported by a valid, independently certified chain of custody certificate for the suppliers of all biobased raw materials used to produce ingredients included in the final product. — In case the certification scheme does not specifically require that all virgin material is sourced from non-GMO species, additional evidence shall be provided to demonstrate this. Notes: [1] In line with the sustainability requirements related to the sourcing of biobased raw material as per the review of the Renewable Energy Directive (RED III). The certification schemes officially recognised by the European Commission are available at: https://energy.ec.europa.eu/topics/renewable-energy/bioenergy/voluntary-schemes_en [2] - The verification can be done via RSPO website, where the status of the certificate is showed in real time: https://www.rspo.org/certification/search-for-supply-chain-certificate-holders

7. Criterion – Sustainable sourcing of raw materials

Palm oil productivity and fatty acid profile make difficult to substitute palm oil

Figure 8. Global vegetable oil production trend (1961 to 2020).





Source: Ritchie, H. (2021) ([76])

In the short- to medium-term **"better" to focus on the sustainability of palm oil sector** to reduce environmental impacts associated with the sourcing of these materials.

European Commission

7. Criterion – Sustainable sourcing of raw materials

How to enhance the sustainability of agriculturally-derived commodities? Sustainability schemes

Palm oil

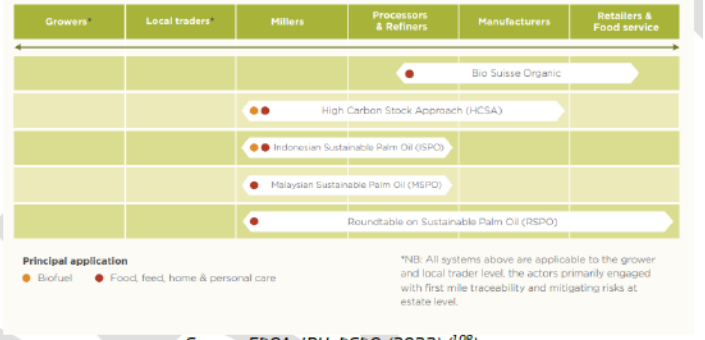
Figure 10. Palm oil sustainability certification schemes

TABLE FOR SECTION 3.4
Overview of certification schemes

Standard (a-z)	Foundation	Certification	Principal focus of standard	Uptake in palm oil sector*	Palm Oil only	Consumer label on packaging
Bio Suisse Organic	1981	Yes, requires companies to be RSPO certified	Food	Low	No	No
High Carbon Stock Approach (HCSA)	2014	No	Covers all palm oil produced	Low	No	No
Indonesian Sustainable Palm Oil (ISPO)	2011	Yes	Covers all palm oil produced	High	Yes	No
Malaysian Sustainable Palm Oil (MSPO)	2013	Yes	Covers all palm oil produced	High	Yes	No
Roundtable on Sustainable Palm Oil (RSPO)	2004	Yes	Food, feed, home & personal care	High	Yes	Yes

* Uptake in palm oil sector' is based on indicators such as MT of palm oil traded under this certification or hectares of plantations certified

FIGURE 3.4
Standards (certification systems and other) mapped according to the principal initiator in the supply chain*, and principal application in palm oil products (see Table 5 on the next page for more detailed information)



Source: EPOA, IDH, RSPO (2022) ([108])

Other biogenic renewable raw materials

Voluntary schemes

Voluntary schemes set standards for the production of sustainable fuels and gases.

PAGE CONTENTS

Voluntary schemes and national certification schemes of EU countries help to ensure that biofuels, bioliqui ds and biomass fuels as well as renewable hydrogen and its derivatives (renewable fuels of non-biological origin or RFNBOs), and recycled carbon fuels (RCF) are sustainably produced by verifying that they comply with the EU sustainability criteria, as well as the relevant methodologies for RFNBOs and RCF.

As such, the schemes check that

- production of feedstock used for the production of biofuels, bioliquids and biomass fuels does not take place on land with high biodiversity and that land with a high amount of carbon has not been converted for such feedstock production
- electricity used for the production of renewable hydrogen is of renewable origin
- production of renewable fuels and gases leads to sufficient greenhouse gas emissions savings

Several schemes also take into account additional sustainability aspects such as soil, water, air protection and social criteria. For the certification process, an external auditor verifies the whole production chain from the origin of the raw material and energy to the fuel producer or trader.

While the schemes are run privately, the European Commission can recognise them as compliant with the rules included in the Renewable Energy Directive.

Voluntary schemes under the Renewable Energy Directive

The EU sustainability criteria cover the production of fuels and energy from agricultural as well as forest biomass and organic waste. Detailed rules describing the certification process are enshrined in the Implementing Regulation on sustainability certification. The sustainability framework for bioenergy has been complemented by rules ensuring the sustainability of renewable hydrogen and its derivates. The European Commission adopted delegated acts including criteria for the sourcing of renewable electricity that is used for the production of RFNBOs as well as a methodology for determining emission savings of RFNBOs and RCF.

https://energy.ec.europa.eu/topics/renewable-energy/bioenergy/voluntary-schemes_en

European Commission

7. Criterion – Sustainable sourcing of raw materials

Points for discussion 9 – Sustainable sourcing of raw materials (formerly *"Sustainable sourcing of palm oil, palm kernel oil and their derivatives)*

Stakeholders are invited to reply the following consultation question:

- Question 21 (**Q21**) – Would you support limiting the chain of custody models to identity preserved and segregated? JRC acknowledges that evidence gathered suggested potential difficulties with compliance, thus it encourages stakeholders commenting on the feasibility of this provision.
- Question 21 (**Q22**) – Would suggest considering the inclusion of specific provisions targeting achieving environmental positive effects via Carbon accounting? If so, could you share specific proposals? For example, requiring a minimum share of in carbon from renewable origin from surfactants systems (as per Blue Angel ecolabel) OR set follow a particular C-footprint methodology to ensure net LCA reduction in C-footprint in ingredients and/or final product.

8. Criterion “Excluded and Restricted substances”

European Commission

8. Criterion Excluded and Restricted substances

Sub-criteria:
(a) Specified excluded and restricted substances
(b) Hazardous substances
(c) Substances of very high concern (SVHCs)
(d) Fragrances
(e) Preservatives
(f) Colouring agents
(g) Enzymes
(h) (Only for HDD) Corrosive properties
(h) (Only for HSC) Micro-organisms

(i) Excluded substances
(ii) Restricted substances

- Isothiazolinones
- Total phosphorus (P) content
- Volatile organic compounds (VOCs)

8. Criterion Excluded and Restricted substances

Linked with **Article 6(6) and 6(7) of the EU Ecolabel Regulation (EC) No 66/2010**

The EU Ecolabel may not be awarded to goods containing substances or mixtures meeting the criteria for classification as

- **toxic**,
- **hazardous to the environment**,
- **carcinogenic, mutagenic or toxic for reproduction (CMR)**, in accordance with CLP

nor to goods containing **substances referred to in Article 57 of Regulation (EC) No 1907/2006** of REACH.

The Regulation allows **derogations** of specific substances under strictly defined conditions:

"(…) only in the event that it is not technically feasible to substitute them as such, or via the use of alternative materials or designs, or in the case of products which have a significantly higher overall environment performance compared with other goods of the same category, the Commission may adopt measures to grant derogations".

"**No derogation** shall be given concerning substances that **meet the criteria of Article 57 of Regulation (EC) No 1907/2006** 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)".

8. Criterion Excluded and Restricted substances a(i) - Excluded substances

Proposed sub-criterion (a) specified excluded and restricted substances (*i*) Excluded substances	
ALL	The substances indicated below shall not be included in the product ~~formulation~~ regardless of concentration, neither as part of the formulation, as part of any mixture included in the formulation, nor as impurities: — Alkyl phenol ethoxylates (APEOs) and other alkyl phenol derivatives, — Atranol, — Chloroatranol, — Diethylenetriaminepentaacetic acid (DTPA), — Ethylenediaminetetraacetic acid (EDTA) and its salts, — Formaldehyde and its releasers (e.g. 2-bromo-2-nitropropane-1,3-diol, 5-bromo-5-nitro-1,3-dioxane, sodium hydroxyl methyl glycinate, diazolidinylurea), with the exception of impurities of formaldehyde in surfactants based on polyalkoxy chemistry up to a concentration of 0,010 % weight by weight in the ingoing substance, — Glutaraldehyde, — Hydroxyisohexyl 3-cyclohexene carboxaldehyde (HICC), — Methylisothiazolinone (MIT), — Microplastics, — ~~Nanosilver~~ Nanomaterials, — Nitromusks and polycyclic musks, — ~~Per-fluorinated alkylates,~~ Per- and polyfluoroalkyl substances (PFAS), — Quaternary ammonium salts not readily biodegradable, — Reactive chlorine compounds, — Rhodamine B, — Substances identified to have endocrine disrupting properties, — Substances considered to be potential endocrine disruptors in category 1 or 2 on the EU's priority list of substances that are to be investigated further for endocrine disruptive effects. — Triclosan, — 3-iodo-2-propynyl butylcarbamate.
DD, HDD, HSC, LD	— Phosphates, — Alkyl phosphoric acid derivatives (e.g. ATMP, HEDP, DTPMP) and their salts
~~DD~~	— ~~Sodium hydroxyl methyl glycinate,~~
HDD	— (only for professional products) Fragrances
HSC	— Aromatic hydrocarbons — Halogenated hydrocarbons

European Commission

8. Criterion Excluded and Restricted substances a(i) - Excluded substances

Proposed sub-criterion (a) specified excluded and restricted substances (i) Excluded substances	
	The substances indicated below shall not be included in the product ~~formulation~~ regardless of concentration, neither as part of the formulation, as part of any mixture included in the formulation, nor as impurities:
ALL	— Alkyl phenol ethoxylates (APEOs) and other alkyl phenol derivatives, — Atranol, — Chloroatranol, — Diethylenetriaminepentaacetic acid (DTPA), — Ethylenediaminetetraacetic acid (EDTA) and its salts, — Formaldehyde and its releasers (e.g. 2-bromo-2-nitropropane-1,3-diol, 5-bromo-5-nitro-1,3-dioxane, sodium hydroxyl methyl glycinate, diazolidinylurea), with the exception of impurities of formaldehyde in surfactants based on polyalkoxy chemistry up to a concentration of 0,010 % weight by weight in the ingoing substance, — Glutaraldehyde, — Hydroxyisohexyl 3-cyclohexene carboxaldehyde (HICC), — Methylisothiazolinone (MIT), — Microplastics, — ~~Nanosilver~~ Nanomaterials, — Nitromusks and polycyclic musks, — ~~Per-fluorinated alkylates,~~ Per- and polyfluoroalkyl substances (PFAS), — Quaternary ammonium salts not readily biodegradable, — Reactive chlorine compounds, — Rhodamine B, — Substances identified to have endocrine disrupting properties, — Substances considered to be potential endocrine disruptors in category 1 or 2 on the EU's priority list of substances that are to be investigated further for endocrine disruptive effects. — Triclosan, — 3-iodo-2-propynyl butylcarbamate.
DD, HDD, HSC, LD	— Phosphates, — Alkyl phosphoric acid derivatives (e.g. ATMP, HEDP, DTPMP) and their salts
~~DD~~	~~— Sodium hydroxyl methyl glycinate,~~
HDD	— (only for professional products) Fragrances
HSC	— Aromatic hydrocarbons — Halogenated hydrocarbons

The substances indicated below shall not be included in the product ~~formulation~~ regardless of concentration, neither as part of the formulation, as part of any mixture included in the formulation, nor as impurities:

Wording aligned with EU Ecolabel criteria for cosmetics products and animal care products - **Commission Decision (EU) 2021/1870**

European Commission

8. Criterion Excluded and Restricted substances a(i) - Excluded substances

Proposed sub-criterion (a) specified excluded and restricted substances (*i*) Excluded substances	
ALL	The substances indicated below shall not be included in the product ~~formulation~~ regardless of concentration, neither as part of the formulation, as part of any mixture included in the formulation, nor as impurities: — Alkyl phenol ethoxylates (APEOs) and other alkyl phenol derivatives, — Atranol, — Chloroatranol, — Diethylenetriaminepentaacetic acid (DTPA), — Ethylenediaminetetraacetic acid (EDTA) and its salts, — Formaldehyde and its releasers (e.g. 2-bromo-2-nitropropane-1,3-diol, 5-bromo-5-nitro-1,3-dioxane, sodium hydroxyl methyl glycinate, diazolidinylurea), with the exception of impurities of formaldehyde in surfactants based on polyalkoxy chemistry up to a concentration of 0,010 % weight by weight in the ingoing substance, — Glutaraldehyde, — Hydroxyisohexyl 3-cyclohexene carboxaldehyde (HICC), — Methylisothiazolinone (MIT), — Microplastics, — ~~Nanosilver~~ Nanomaterials, — Nitromusks and polycyclic musks, — ~~Per-fluorinated alkylates,~~ Per- and polyfluoroalkyl substances (PFAS), — Quaternary ammonium salts not readily biodegradable, — Reactive chlorine compounds, — Rhodamine B, — Substances identified to have endocrine disrupting properties, — Substances considered to be potential endocrine disruptors in category 1 or 2 on the EU's priority list of substances that are to be investigated further for endocrine disruptive effects. — Triclosan, — 3-iodo-2-propynyl butylcarbamate.
DD, HDD, HSC, LD	— Phosphates, — Alkyl phosphoric acid derivatives (e.g. ATMP, HEDP, DTPMP) and their salts
~~DD~~	~~— Sodium hydroxyl methyl glycinate,~~
HDD	— (only for professional products) Fragrances
HSC	— Aromatic hydrocarbons — Halogenated hydrocarbons

~~Nanosilver~~ Nanomaterials

Exclusion of all nanomaterials

In line with EU Ecolabel criteria for cosmetics products and animal care products - Commission Decision (EU) 2021/1870 and with Nordic Swan.

European Commission

8. Criterion Excluded and Restricted substances a(i) - Excluded substances

Proposed sub-criterion (a) specified excluded and restricted substances (*i*) Excluded substances	
ALL	The substances indicated below shall not be included in the product ~~formulation~~ regardless of concentration, neither as part of the formulation, as part of any mixture included in the formulation, nor as impurities: — Alkyl phenol ethoxylates (APEOs) and other alkyl phenol derivatives, — Atranol, — Chloroatranol, — Diethylenetriaminepentaacetic acid (DTPA), — Ethylenediaminetetraacetic acid (EDTA) and its salts, — Formaldehyde and its releasers (e.g. 2-bromo-2-nitropropane-1,3-diol, 5-bromo-5-nitro-1,3-dioxane, sodium hydroxyl methyl glycinate, diazolidinylurea), with the exception of impurities of formaldehyde in surfactants based on polyalkoxy chemistry up to a concentration of 0,010 % weight by weight in the ingoing substance, — Glutaraldehyde, — Hydroxyisohexyl 3-cyclohexene carboxaldehyde (HICC), — Methylisothiazolinone (MIT), — Microplastics, — ~~Nanosilver~~ Nanomaterials, — Nitromusks and polycyclic musks, — ~~Per-fluorinated alkylates,~~ Per- and polyfluoroalkyl substances (PFAS), — Quaternary ammonium salts not readily biodegradable, — Reactive chlorine compounds, — Rhodamine B, — Substances identified to have endocrine disrupting properties, — Substances considered to be potential endocrine disruptors in category 1 or 2 on the EU's priority list of substances that are to be investigated further for endocrine disruptive effects. — Triclosan, — 3-iodo-2-propynyl butylcarbamate.
DD, HDD, HSC, LD	— Phosphates, — Alkyl phosphoric acid derivatives (e.g. ATMP, HEDP, DTPMP) and their salts
~~DD~~	~~— Sodium hydroxyl methyl glycinate,~~
HDD	— (only for professional products) Fragrances
HSC	— Aromatic hydrocarbons — Halogenated hydrocarbons

~~Per-fluorinated alkylates,~~ Per- and polyfluoroalkyl substances (PFAS)

Exclusion in line with EU Ecolabel criteria for cosmetics products and animal care products - Commission Decision (EU) 2021/1870 and with Nordic Swan.

Concerns:

- Resistance to environmental degradation
- Accumulate in the bodies of humans and animals

European Commission has proposed under the Chemicals Strategy for Sustainability a set of actions to address the use of and contamination with PFAS

European Commission

8. Criterion Excluded and Restricted substances a(i) - Excluded substances

Proposed sub-criterion (a) specified excluded and restricted substances (*i*) Excluded substances	
ALL	The substances indicated below shall not be included in the product ~~formulation~~ regardless of concentration, neither as part of the formulation, as part of any mixture included in the formulation, nor as impurities: — Alkyl phenol ethoxylates (APEOs) and other alkyl phenol derivatives, — Atranol, — Chloroatranol, — Diethylenetriaminepentaacetic acid (DTPA), — Ethylenediaminetetraacetic acid (EDTA) and its salts, — Formaldehyde and its releasers (e.g. 2-bromo-2-nitropropane-1,3-diol, 5-bromo-5-nitro-1,3-dioxane, sodium hydroxyl methyl glycinate, diazolidinylurea), with the exception of impurities of formaldehyde in surfactants based on polyalkoxy chemistry up to a concentration of 0,010 % weight by weight in the ingoing substance, — Glutaraldehyde, — Hydroxyisohexyl 3-cyclohexene carboxaldehyde (HICC), — Methylisothiazolinone (MIT), — Microplastics, — ~~Nanosilver~~ Nanomaterials, — Nitromusks and polycyclic musks, — ~~Per-fluorinated alkylates,~~ Per- and polyfluoroalkyl substances (PFAS), — Quaternary ammonium salts not readily biodegradable, — Reactive chlorine compounds, — Rhodamine B, — Substances identified to have endocrine disrupting properties, — Substances considered to be potential endocrine disruptors in category 1 or 2 on the EU's priority list of substances that are to be investigated further for endocrine disruptive effects. — Triclosan, — 3-iodo-2-propynyl butylcarbamate.
DD, HDD, HSC, LD	— Phosphates, — Alkyl phosphoric acid derivatives (e.g. ATMP, HEDP, DTPMP) and their salts
~~DD~~	~~— Sodium hydroxyl methyl glycinate,~~
HDD	— (only for professional products) Fragrances
HSC	— Aromatic hydrocarbons — Halogenated hydrocarbons

- Substances identified to have endocrine disrupting properties,
- Substances considered to be potential endocrine disruptors in category 1 or 2 on the EU's priority list of substances that are to be investigated further for endocrine disruptive effects.

Exclusion in line with:

- EU Ecolabel for Absorbent Hygiene Products (Commission Decision (EU) 2023/1809)
- EU Ecolabel criteria for cosmetics (Commission Decision (EU) 2021/1870),
- Nordic Swan criteria

Revision of CLP Regulation 1272/2008

December 2022, Delegated Act establishing new hazard classes for EDs

European Commission

8. Criterion Excluded and Restricted substances a(i) - Excluded substances

Proposed sub-criterion (a) specified excluded and restricted substances (*i*) Excluded substances	
ALL	The substances indicated below shall not be included in the product ~~formulation~~ regardless of concentration, neither as part of the formulation, as part of any mixture included in the formulation, nor as impurities: — Alkyl phenol ethoxylates (APEOs) and other alkyl phenol derivatives, — Atranol, — Chloroatranol, — Diethylenetriaminepentaacetic acid (DTPA), — Ethylenediaminetetraacetic acid (EDTA) and its salts, — Formaldehyde and its releasers (e.g. 2-bromo-2-nitropropane-1,3-diol, 5-bromo-5-nitro-1,3-dioxane, sodium hydroxyl methyl glycinate, diazolidinylurea), with the exception of impurities of formaldehyde in surfactants based on polyalkoxy chemistry up to a concentration of 0,010 % weight by weight in the ingoing substance, — Glutaraldehyde, — Hydroxyisohexyl 3-cyclohexene carboxaldehyde (HICC), — Methylisothiazolinone (MIT), — Microplastics, — ~~Nanosilver~~ Nanomaterials, — Nitromusks and polycyclic musks, — ~~Per-fluorinated alkylates,~~ Per- and polyfluoroalkyl substances (PFAS), — Quaternary ammonium salts not readily biodegradable, — Reactive chlorine compounds, — Rhodamine B, — Substances identified to have endocrine disrupting properties, — Substances considered to be potential endocrine disruptors in category 1 or 2 on the EU's priority list of substances that are to be investigated further for endocrine disruptive effects. — Triclosan, — 3-iodo-2-propynyl butylcarbamate.
DD, HDD, HSC, LD	— Phosphates, — Alkyl phosphoric acid derivatives (e.g. ATMP, HEDP, DTPMP) and their salts
~~DD~~	— ~~Sodium hydroxyl methyl glycinate,~~
HDD	— (only for professional products) Fragrances
HSC	— Aromatic hydrocarbons — Halogenated hydrocarbons

Formaldehyde and its releasers (e.g. 2-bromo-2-nitropropane-1,3-diol, 5-bromo-5-nitro-1,3-dioxane, sodium hydroxyl methyl glycinate, diazolidinylurea), with the exception of impurities of formaldehyde in surfactants based on polyalkoxy chemistry up to a concentration of 0,010 % weight by weight in the ingoing substance,

Sodium hydroxyl methyl glycinate is already excluded as a formaldehyde releaser

European Commission

8. Criterion Excluded and Restricted substances a(i) - Excluded substances

The following additional substances are **excluded from other ISO Type I schemes** such as **Nordic Swan or Blue Angel** but are not excluded from the EU Ecolabel:

- Organic chlorine compounds, hypochlorites, and hypochlorous acid
- Methyldibromo glutaronitrile
- Phthalates
- BHT (butylated hydroxytoluene
- Benzalkonium chloride
- 34 bisphenols
- Halogenated flame retardants
- DADMAC
- Benzotriazole and benzotriazole derivatives
- Parabens
- Formic acid
- Butylphenyl Methylpropional (2-(4-tert-Butylbenzyl)propionaldehyde; Lysmeral; Lilial

Points for discussion 10 – Excluded substances

Stakeholders are invited to reply the following consultation question:

— Question 23 (**Q23) –** Would you support the exclusion of any of the substances reported in the list of 'additional substances' from the EU Ecolabel for detergents?

Questions / Comments?

European Commission

8. Criterion Excluded and Restricted substances a(i) - Excluded substances

Proposed sub-criterion (a) specified excluded and restricted substances (*i*) Excluded substances	
ALL	The substances indicated below shall not be included in the product ~~formulation~~ regardless of concentration, neither as part of the formulation, as part of any mixture included in the formulation, nor as impurities: — Alkyl phenol ethoxylates (APEOs) and other alkyl phenol derivatives, — Atranol, — Chloroatranol, — Diethylenetriaminepentaacetic acid (DTPA), — Ethylenediaminetetraacetic acid (EDTA) and its salts, — Formaldehyde and its releasers (e.g. 2-bromo-2-nitropropane-1,3-diol, 5-bromo-5-nitro-1,3-dioxane, sodium hydroxyl methyl glycinate, diazolidinylurea), with the exception of impurities of formaldehyde in surfactants based on polyalkoxy chemistry up to a concentration of 0,010 % weight by weight in the ingoing substance, — Glutaraldehyde, — Hydroxyisohexyl 3-cyclohexene carboxaldehyde (HICC), — Methylisothiazolinone (MIT), — Microplastics, — ~~Nanosilver~~ Nanomaterials, — Nitromusks and polycyclic musks, — ~~Per-fluorinated alkylates,~~ Per- and polyfluoroalkyl substances (PFAS), — Quaternary ammonium salts not readily biodegradable, — Reactive chlorine compounds, — Rhodamine B, — Substances identified to have endocrine disrupting properties, — Substances considered to be potential endocrine disruptors in category 1 or 2 on the EU's priority list of substances that are to be investigated further for endocrine disruptive effects. — Triclosan, — 3-iodo-2-propynyl butylcarbamate.
DD, HDD, HSC, LD	— Phosphates, — Alkyl phosphoric acid derivatives (e.g. ATMP, HEDP, DTPMP) and their salts
~~DD~~	— ~~Sodium hydroxyl methyl glycinate,~~
HDD	— (only for professional products) Fragrances
HSC	— Aromatic hydrocarbons — Halogenated hydrocarbons

Methylisothiazolinone (MIT)

European Commission

8. Criterion Excluded and Restricted substances
a(ii) Restricted substances - Isothiazolinones

Existing Isothiazolinones restriction in EU Ecolabel

The substances listed below shall not be included in the product formulation above the concentrations indicated:

— 2-methyl-2H-isothiazol-3-one: 0,0050 % weight by weight,

— 1,2-Benzisothiazol-3(2H)-one: 0,0050 % weight by weight,

— 5-chloro-2-methyl-4-isothiazolin-3-one/2-methyl-4-isothiazolin-3-one: 0,0015 % weight by weight

Should the value of 2-methyl-2H-isothiazol-3-one allowed in Annex V (List of preservatives allowed in cosmetic products) to Regulation (EC) No 1223/2009 of the European Parliament and of the Council be lower at the time of the application, then that lower value shall take precedence

Current value in Annex V: 0,0015 %

Presence of MIT in commercial mixtures has led to **an increase in cases of skin sensitization and contact dermatitis**

- **Nordic Swan** has banned MIT from all detergent products except for LD products
- **EU Ecolabel cosmetic** products excludes all isothiazolinones regardless of the concentration
- **EU Ecolabel for absorbent hygiene products** prohibits the use of CMIT and MIT.

European Commission

8. Criterion Excluded and Restricted substances
a(ii) Restricted substances - Isothiazolinones

Substance	CAS No.	When reclassified and for what hazard(s)?	Type of classification
Bronopol	52-51-7	1st ATP (2009): H302, H312, H315, H318, H335, H400 (M=10)	Harmonised
Bronopol (proposed reclassification)	52-51-7	Proposal (ongoing): H301, H331, H312, H315, H318, H335, H400 (M=10), H411	If accepted: harmonised
1,2 benzisothiazol-3(2H)-one (BIT)	2634-33-5	11th ATP (2018): H302, H317 (0,05%), H318, H315, H400	Harmonised
1,2 benzisothiazol-3(2H)-one (proposed reclassification)	2634-33-5	Proposal (ongoing): H302, H330, H317 (0,036%), H318, H315, H400, H410	If accepted: harmonised
2-methyl-2H-isothiazol-3-one (MIT)	2682-20-4	13th ATP (2018): H301, H311, H314, H318, H317 (0,0015%), H330, H400 (M=10), H410	Harmonised
reaction mass of 5-chloro-2-methyl-2H-isothiazol-3-one and 2-methyl-2H-isothiazol-3-one (3:1) (CMIT:MIT)	55965-84-9	13th ATP (2018): H301, H310, H314, H318, H317 (0,0015%), H330, H400, H410	Harmonised
Phenoxyethanol	122-99-6	17th ATP (2021): H302, H318, H335	Harmonised

- All 5 preservatives have harmonised CLP classifications.
- Only 1 of the 5 preservatives (phenoxyethanol) do not have any EU Ecolabel restricted hazards (restricted hazards in EU Ecolabel for Detergent are highlighted in red).

Alternative preservative options used in industry:

- Phenoxyethanol,
- Sodium benzoate,
- Potassium sorbate,
- Lactic acid,
- Bronopol,
- Sodium pyrithione,
- DBNPA,
- Benzyl alcohol,
- Glyceryl laurate,
- Essential oils

Data from Focus questionnaire

European Commission

8. Criterion Excluded and Restricted substances a(ii) Restricted substances – Isothiazolinones

Isothiazolinones restriction

The substances listed below shall not be included in the product formulation above the concentrations indicated:

- ~~2-methyl-2H-isothiazol-3-one: 0,0050 % weight by weight~~,
- 1,2-Benzisothiazol-3(2H)-one: 0,0050 % weight by weight,
- ~~5-chloro-2-methyl-4-isothiazolin-3-one/2-methyl-4-isothiazolin-3-one: 0,0015 % weight by weight~~

Points for discussion 11 – Excluded & Restricted Substances (Isothiazolinones)

Stakeholders are invited to reply the following consultation questions:

- Question 24 (**Q24**) - Do you agree with the exclusion of MIT and CMIT/MIT from all EU Ecolabel detergent product groups?
- Question 25 (**Q25**) - Would you agree with the complete exclusion of isothiazolinones from all detergent product groups?
- Question 26 (**Q26**) - Phenoxyethanol does not have any EU Ecolabel restricted hazards. Do you believe that phenoxyethanol could serve as a viable alternative to isothiazolinones? If not, why?

European Commission

8. Criterion Excluded and Restricted substances a(i) - Excluded substances

Proposed sub-criterion (a) specified excluded and restricted substances (*i*) Excluded substances	
ALL	The substances indicated below shall not be included in the product ~~formulation~~ regardless of concentration, neither as part of the formulation, as part of any mixture included in the formulation, nor as impurities: — Alkyl phenol ethoxylates (APEOs) and other alkyl phenol derivatives, — Atranol, — Chloroatranol, — Diethylenetriaminepentaacetic acid (DTPA), — Ethylenediaminetetraacetic acid (EDTA) and its salts, — Formaldehyde and its releasers (e.g. 2-bromo-2-nitropropane-1,3-diol, 5-bromo-5-nitro-1,3-dioxane, sodium hydroxyl methyl glycinate, diazolidinylurea), with the exception of impurities of formaldehyde in surfactants based on polyalkoxy chemistry up to a concentration of 0,010 % weight by weight in the ingoing substance, — Glutaraldehyde, — Hydroxyisohexyl 3-cyclohexene carboxaldehyde (HICC), — Methylisothiazolinone (MIT), — Microplastics, — ~~Nanosilver~~ Nanomaterials, — Nitromusks and polycyclic musks, — ~~Per-fluorinated alkylates,~~ Per- and polyfluoroalkyl substances (PFAS), — Quaternary ammonium salts not readily biodegradable, — Reactive chlorine compounds, — Rhodamine B, — Substances identified to have endocrine disrupting properties, — Substances considered to be potential endocrine disruptors in category 1 or 2 on the EU's priority list of substances that are to be investigated further for endocrine disruptive effects. — Triclosan, — 3-iodo-2-propynyl butylcarbamate.
DD, HDD, HSC, LD	— Phosphates, — Alkyl phosphoric acid derivatives (e.g. ATMP, HEDP, DTPMP) and their salts
~~DD~~	— ~~Sodium hydroxyl methyl glycinate,~~
HDD	— (only for professional products) Fragrances
HSC	— Aromatic hydrocarbons — Halogenated hydrocarbons

Proposed exclusion of Alkyl phosphoric acid derivatives (e.g. ATMP, HEDP, DTPMP) and their salts from DD, HDD, HSC and LD beside the current exclusion of Phosphate

In line with Blue Angel requirements

Environmental impacts:

- Eutrophication
- Availability of phosphate rock

Phosphate rock is included to the fifth European list of critical raw materials (2023).

European Commission

8. Criterion Excluded and Restricted substances
a(ii) Restricted substances – Total phosphorus (P) content

- Other ISO Type I schemes, such as **Nordic Swan** and **Blue Angel**, have **stricter limitations** on the use of **phosphorous content**
- Preliminary analysis of the **focus questionnaire** indicates detergent **products with lower P content values** compared to the current limits and also the availability of **P-free detergents**.
- **Nordic Swan prohibits** the use of **phosphate** in **IILD and IIDD**, with an exemption for those used to stabilize H2O2 (allowed in concentrations < 0.0100 w-% in the final products) in the case of IILD.

Additional data needed for IILD and IIDD

Proposals to be refined

Product group	Product type	P content
HSC	All-purpose cleaners, RTU	~~0,02~~0,01 g/l of RTU product
HSC	All-purpose cleaners, undiluted	~~0,02~~0,01 g/l of cleaning solution
HSC	Kitchen cleaners, RTU	~~1,00~~ 0,10 g/l of RTU product
HSC	Kitchen cleaners, undiluted	~~1,00~~ 0,10 g/l of cleaning solution
HSC	Window cleaners, RTU	0,00 g/l of RTU product
HSC	Window cleaners, undiluted	0,00 g/l of cleaning solution
HSC	Sanitary cleaners, RTU	~~1,00~~ 0,10 g/l of RTU product
HSC	Sanitary cleaners, undiluted	~~1,00~~ 0,10 g/l of cleaning solution
HDD	Hand Dishwashing Detergents	~~0,08~~ 0,01 g/l of washing water.
DD	Dishwashing Detergents	0,20 g/wash for dishwasher detergents
DD	Rinse aids	0,030 g/wash for rinse aids
LD	Laundry detergents	~~0,04~~ 0,03 g/kg of laundry for laundry detergents
LD	Stain removers	0,005 g/kg of laundry for stain removers

8. Criterion Excluded and Restricted substances
a(ii) Restricted substances – Total phosphorus (P) content

Points for discussion 12 – Excluded & Restricted Substances (Phosphorus)

Stakeholders are invited to reply the following consultation questions:

- Question 27 (**Q27**) – Would you support proposed LD, DD, HDD, HSC limits? In addition, would you support a further reduction of the limits?
- Question 28 (**Q28**) – Can you provide P-content value data for IILD and IIDD to help support the criteria revision process and make sure that new values have an appropriate level of ambition?
- Question 29 (**Q29**) – Would you support the exclusion of phosphate from IILD and IIDD in line with Nordic Swan?
- Question – Would you support the proposed exclusion of Alkyl phosphoric acid derivatives (e.g. ATMP, HEDP, DTPMP) and their salts from DD, HDD, HSC and LD?

8. Criterion Excluded and Restricted substances a(ii) Restricted substances – VOCs

Only in HSC

Purposes of VOCs in cleaning products

- Solvents
- Fragrances
- Preservation
- Disinfection

sources of

- aromatic hydrocarbons,
- alkane hydrocarbons,
- aldehydes,
- aliphatic hydrocarbons,
- chlorinated hydrocarbons
- terpenes,
- alcohols
- glycol and glycol ethers,
- esters

Health and environmental impacts due to exposure:

- respiratory, nervous, cardiovascular
- allergic sensitization
- carcinogenicity
- altering the concentration of ozone
- formation of ground-level ozone

Product type	VOC limit
All-purpose cleaners, RTU	~~30~~ 1 g/l of RTU product
All-purpose cleaners, undiluted	~~30~~1 g/l of cleaning solution
Kitchen cleaners, RTU	~~60~~10 g/l of RTU product
Kitchen cleaners, undiluted	~~60~~10 g/l of cleaning solution
Window cleaners, RTU	100 g/l of RTU product
Window cleaners, undiluted	100 g/l of cleaning solution
Sanitary cleaners, RTU	~~60~~10 g/l of RTU product
Sanitary cleaners, undiluted	~~60~~10 g/l of cleaning solution

Changes overview:
Stricter thresholds.

Main streams of evidences:

- Literature
- Focused questionnaire;
- Other ecolabels;

Proposals to be refined

European Commission

8. Criterion Excluded and Restricted substances a(ii) Restricted substances – VOCs

Only in HSC

EU Ecolabel (EUEL) VOCs **definition**: "**VOCs means any organic compound having a boiling point lower than 150 °C**"

Nordic Swan defines VOC in accordance with Directive 1999/13/EC and **excludes the use of VOC** from cleaning products, **with exemptions** for isopropanol, ethanol (including denaturing agents) and fragrances.

Blue Angel considers VOCs as any organic compound with a **boiling point lower than 150 °C** in line with the EUEL and sets stricter limits. Blue Angel also includes **limits for HDD** products.

	Blue Angel
Product Type	VOC limit
All-purpose cleaners	1.0 g/l of cleaning solution
Kitchen cleaners	10.0 g/1000g cleaning solution
Bathroom cleaner s	10.0 g/1000g of cleaning solution
Toilet cleaners	10.0 g/1000g of cleaning solution
Window cleaners	100.0 g/1000g cleaning solution
Hand dishwashing detergent	0.1 g/l dishwashing water

Directive 1999/13/EC : VOC means any organic compound having at 293.15 K a vapour pressure of 0.01 kPa or more

No longer in force

Directive 2004/42/EC: VOC means any organic compound having an initial boiling point less than or equal to 250°C measured at a standard pressure of 101,3 kPa;

Data wanted! (e.g. **formulation**)

European Commission

8. Criterion Excluded and Restricted substances
a(ii) Restricted substances – VOCs

Points for discussion 13 – Excluded & Restricted Substances (VOC)

Stakeholders are invited to reply the following consultation questions:

- Question 30 (**Q30)** – Would you support alignment with Directive 2004/42/EC and change the current VOC definition from 150°C to 250°C VOC?
- Question 31 (**Q31) -** Do you support proposed limits? If not, why? In addition, would you support a further reduction of the limits?
- Question 32 (**Q32) –** Would you support the inclusion of VOC limit for HDD products in line with Blue Angel?

8. Criterion Excluded and Restricted substances
b) Hazardous substances

According to **Article 6(6) of the EU Ecolabel Regulation (EC) No 66/2010**:
"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 (CMR), in accordance with Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, nor to goods containing substances referred to in Article 57 of Regulation (EC) No 1907/2006 of the European parliament and the Council of 18 December 2006 concerning the Registration, evaluation, authorization of chemicals (REACH) establishing a European Chemicals Agency".

(*i*) Final product

The final product shall not be classified ~~and labelled~~ as being acutely toxic, a specific target organ toxicant, a respiratory or skin sensitiser, carcinogenic, mutagenic or toxic for reproduction, or hazardous to the aquatic environment, as defined in Annex I to Regulation (EC) No 1272/2008 and in accordance with the list in Table X.

(*ii*) Ingoing substances

The product shall not contain ingoing substances at a concentration limit at or above 0,010 % weight by weight in the final product that meet the criteria for classification as toxic, hazardous to the aquatic environment, respiratory or skin sensitisers, carcinogenic, mutagenic or toxic for reproduction in accordance with Annex I to Regulation (EC) No 1272/2008 and in accordance with the list in Table X.

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

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 organ toxicity	
Categories 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	
Categories 1A/1	Category B
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	
Endocrine disruptors for human health and the environment	
Category 1	Category 2
EUH380: May cause endocrine disruption in humans	EUH381: Suspected of causing endocrine disruption in humans
EUH430: May cause endocrine disruption in the environment	EUH431: Suspected of causing endocrine disruption in the environment
Persistent, Bioaccumulative and Toxic	
PBT	vPvB
EUH440: Accumulates in the environment and living organisms including in humans	EUH441: Strongly accumulates in the environment and living organisms including in humans
Persistent, Mobile and Toxic	
PMT	vPvM
EUH450: Can cause long-lasting and diffuse contamination of water resources	EUH451: Can cause very long-lasting and diffuse contamination of water resource
Hazardous to the ozone layer	
H420 Hazardous to the ozone layer	

8. Criterion Excluded and Restricted substances
b) Hazardous substances

In December 2022, the Commission published a proposal for a revised Regulation on the classification, labelling, and packaging of chemicals (CLP) which includes a Delegated Act to introduce new hazard classes for endocrine disruptors, PBT, and PMT substances.

The new hazard classes are:

- ED HH in Category 1 and Category 2 (Endocrine disruption for human health)
- ED ENV in Category 1 and Category 2 (Endocrine disruption for the environment)
- PBT (persistent, bioaccumulative, toxic), vPvB (very persistent, very bioaccumulative)
- PMT (persistent, mobile, toxic), vPvM (very persistent, very mobile)

Endocrine disruptors for human health and the environment	
Category 1	**Category 2**
EUH380: May cause endocrine disruption in humans	EUH381: Suspected of causing endocrine disruption in humans
EUH430: May cause endocrine disruption in the environment	EUH431: Suspected of causing endocrine disruption in the environment
Persistent, Bioaccumulative and Toxic	
PBT	**vPvB**
EUH440: Accumulates in the environment and living organisms including in humans	EUH441: Strongly accumulates in the environment and living organisms including in humans
Persistent, Mobile and Toxic	
PMT	**vPvM**
EUH450: Can cause long-lasting and diffuse contamination of water resources	EUH451: Can cause very long-lasting and diffuse contamination of water resource

8. Criterion Excluded and Restricted substances
b) Hazardous substances

According to **Article 6(7) of the EU Ecolabel Regulation (EC) No 66/2010**:

"For specific categories of goods containing substances and only in the event that it is not technically feasible to substitute them as such, or via the use of alternative materials or designs, or in the case of products which have a significantly higher overall environment performance compared with other goods of the same category, the Commission may adopt measures to grant derogations ….."

Current derogated substances

Product Catergory	Substance	Hazard statement
ALL PRODUCT CATEGORIES	Surfactants	H400 Very toxic to aquatic life
		H412 Harmful to aquatic life with long-lasting effects
	Enzymes(*)	H317 May cause allergic skin reaction
		H334 May cause allergy or asthma symptoms or breathing difficulties if inhaled
	NTA as an impurity in MGDA and GLDA (**)	H351 Suspected of causing cancer
LD, IILD, DD, IIDD and HDD	Subtilisin	H400 Very toxic to aquatic life
		H411 Toxic to aquatic life with long-lasting effects
IILD	ε-phthalaimido-peroxy-hexaoic acid (PAP) used as bleaching agent at max concentration of 0,6 g/kg of laundry	H400 Very toxic to aquatic life
		H412 Harmful to aquatic life with long-lasting effects
IILD	Peracetic acid/hydrogen peroxide used as bleaching agent	H400 Very toxic to aquatic life
		H410 Very toxic to aquatic life with long-lasting effects
		H412 Harmful to aquatic life with long-lasting effects
(*) Including stabilisers and other auxiliary substances in the preparations (**) In concentrations lower than 0,2 % in the raw material as long as the total concentration in the final product is lower than 0,10 %.		

European Commission

8. Criterion Excluded and Restricted substances
b) Hazardous substances

Derogations – Procedure to follow

EUROPEAN COMMISSION
JOINT RESEARCH CENTRE
Institute for Prospective Technological Studies (Seville)
Sustainable Production & Consumption Unit

EU Ecolabel on xxx: Hazardous substance criteria
Substitution information and Derogation request form

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	
1c. Current EU regulatory status	

Derogation template to fill in will be place in the **Product Bureau website and BATIS**

European Commission

8. Criterion Excluded and Restricted substances
b) Hazardous substances

Points for discussion 14 – Titanium Dioxide derogation

Stakeholders are invited to reply the following consultation questions:

- Question 33 (**Q33**) – Is titanium dioxide used in detergent products? If so, in which products, for what purpose and at what levels?
- Question 34 (**Q34**) – Would you support a derogation for TiO2 in EUEL criteria for the classification of H351? If so, please also clarify if your support is only for liquid detergent products or also for powder detergent products. Note that this assumes that the harmonised classification for TiO2 is maintained as a result of the ongoing legal disputes ([169],[170])

8. Criterion Excluded and Restricted substances (d) Fragrances

Existing sub-criterion (d) fragrances	
DD, HDD, HSC, IILD, LD	Any ingoing substance added to the product as a fragrance shall be manufactured and handled following the code of practice of the International Fragrance Association (IFRA) ([171]). The recommendations of the IFRA Standards concerning prohibition, restricted use and specified purity criteria for substances shall be followed by the manufacturer.
HDD	Fragrances shall not be used in hand dishwashing detergents for professional use.
IIDD	Industrial and institutional dishwasher products shall not contain any fragrances.

Changes overview:
Further requirements/restrictions beyond industry self-regulation

Main streams of evidences:
- Literature
- Other ecolabels;

8. Criterion Excluded and Restricted substances
(d) Fragrances

DD, HDD, HSC, IILD, LD	Products marked as “mild/sensitive” shall be fragrance-free. Substances listed under Table 13-1 of the SCCS opinion on ‘Fragrance allergens in cosmetic products’ ([172]) shall not be present in EU Ecolabel products in concentrations higher than 0,010% (by weight) per substance. Fragrances which are prohibited according to Annex II to the Cosmetics Regulation ([173]) shall not be present in EU Ecolabel products in concentrations ≥ 0,010 % (by weight) per substance. Any ingoing substance added to the product as a fragrance shall be manufactured and handled following the code of practice of the International Fragrance Association (IFRA) ([174]). For such ingoing substances, ~~T~~the recommendations of the IFRA Standards concerning prohibition, restricted use and specified purity criteria for substances shall be followed by the manufacturer.

Alignment with Blue Angel

Alignment with EU Ecolabel for Cosmetics

Fragrance exclusion from DD ??

Proposals to be refined

European Commission

8. Criterion Excluded and Restricted substances
(d) Fragrances

DD, HDD, HSC, IILD, LD	*Assessment and verification:* the applicant shall provide a signed declaration of compliance, supported by a signed declaration of compliance from the supplier or fragrance manufacturer, as appropriate, safety data sheets for any fragrance formulations used and calculations, if necessary, to demonstrate compliance with the 0,010 % thresholds in the detergent product for Table 13-1 or Annex II fragrance substances.~~shall provide a signed declaration of compliance.~~

Questions / Comments?

European Commission

Thank you

Slide/s xx: Detergent and cleaning products icons, source: e.g. Freepik - Flaticon.com (attribution surang)
Slide/s xx: Safety Helmet, source: e.g. "Designed by rocketpixel / Freepik"
Slide/s xx: YYYY, source: e.g. ZZZZZZ

European Commission

Revision of the EU Ecolabel criteria for
DETERGENT AND CLEANING PRODUCTS
12-13th March 2024

WEBEX SESSION

ETIQUETTE FOR VIRTUAL MEETING PARTICIPANTS

- **Please indicate "NAME OF YOUR ORGANIZATION + YOUR FULL NAME"**
- **MUTE YOUR MIC AND SWITCH OFF you CAMERA (unless you have the floor)**
- **USE THE CHAT only to ask for the FLOOR (write "FLOOR" in the chat), and COMMENT only ORALLY**

EUEL DETERGENTS
1ST AHWG
DAY 2 - 13 MARCH 2024

European Commission

EU Ecolabel Criteria for Detergents product groups

Laundry Detergents	LD
Industrial & Institutional Laundry detergents	IILD
Dishwasher Detergents	DD
Industrial & Institutional Dishwasher detergents	IIDD
Hand Dishwashing Detergents	HDD
Hard Surface Cleaning Products	HSC

1st Ad-hoc Working Group Meeting 12th - 13th March 2024, Virtual meeting



The Joint Research Centre (JRC)

Alfonso Jose Lag-Brotons

Maria Grazia La Placa

European Commission

1. Opening of virtual room, welcome of participants and introductions

European Commission

Agenda

Day 1: Tuesday 12th March 2024

		SCHEDULE
1.	Opening of virtual room, welcome of participants and introductions	09:00 – 09:15
2.	Political objectives of the EU Ecolabel and process description	09:15 – 09:30
3.	Preliminary background (PR) information (e.g. market analysis, LCA screening studies)	09:30 – 10:00
4.	Scope and definitions	10:00 – 11:30
	Break (15 min)	11:30 – 11:45
5.	EU Ecolabel criteria for detergents - Revision of criteria and discussion: Assessment and verification + Reference dosage **+ Criterion: "*Dosage requirements*".**	11:45 – 12:15
6.	EU Ecolabel criteria for detergents - Revision of criteria and discussion: Criterion: **"***Toxicity to aquatic organisms***" +** Criterion: **"***Biodegradability***"**	12:15 – 13:30
	Lunch break (1 hour)	13:30 – 14:30
7.	EU Ecolabel criteria for detergents – Criterion "Sustainable sourcing of raw materials"	14:30 – 15:00
8.	EU Ecolabel criteria for detergents – Criterion "Excluded and **Restricted substances"** [Part 1 of 2; targeting sub-criterions (a), (b), (c) and (d)]	15:00 – 17:00

European Commission

Agenda

Day 2: Wednesday 13th March 2024

		SCHEDULE
1.	Opening of virtual room and welcome and recap of previous day	09:00 – 09:15
2.	EU Ecolabel criteria for detergents – Criterion "Excluded and Restricted substances" [Part 2 of 2; targeting sub-criterions (e), (f), (g) and (h)]	09:15 – 10:45
	Break (15 min)	10:45 – 11:00
3.	EU Ecolabel criteria for detergents – Criterion **"Packaging"** [Part 1 of 2; (New) Recycled material content and WUR]	11:00 – 11:45
4.	EU Ecolabel criteria for detergents – Criterion "Packaging" [Part 2 of 2; Design for Recycling; Products sold in spray bottles; Packaging take back system]	11:45 – 12:30
	Lunch break (1 hour)	12:30 – 13:30
5.	EU Ecolabel criteria for detergents – Criterions "Fitness for use"; "Automatic dosing system", "**User information"** and **"Information appearing on the EU Ecolabel"**	13:30 – 14:00
6.	Conclusion, next steps and closure of the meeting	14:00 – 14:30

European Commission

2. Criterion “Excluded and Restricted substances” [Part 2 of 2; targeting sub-criterions (e), (f), (g) and (h)]

European Commission

2. Criterion Excluded and Restricted substances
(e) Preservatives

ALL	(i) The product may only include preservatives in order to preserve the product, and in the appropriate dosage for this purpose alone. This does not refer to surfactants which may also have biocidal properties. (ii) The product may contain preservatives provided that they are not bio-accumulating. A preservative is considered to be not bio-accumulating if the BCF is < ~~100~~500 or log K_{ow} is < ~~3,0~~4,0. If both the BCF and log K_{ow} values are available, the highest measured BCF value shall be used. (iii) It is prohibited to claim or suggest on the packaging or by any other communication that the product has an antimicrobial or disinfecting effect.

Changes overview:

Alignment with CLP and Nordic Swan

2. Criterion Excluded and Restricted substances
(f) Colouring agents

ALL	Colouring agents in the product shall not be bio-accumulating. A colouring agent is considered not bio-accumulating if the BCF is < ~~100~~500 or log K_{ow} is < ~~3,0~~4,0. If both the BCF and log K_{ow} 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 bio-accumulation potential.

Changes overview:

Alignment with CLP and Nordic Swan

2. Criterion Excluded and Restricted substances
h) Microorganisms

Changes overview:

- **Scope –** Expanded to LD (fine tailoring pending)
- **Shell-life -** clarification thresholds units (log-scale)
- **QPS removed –** it is not a proof of safety

Main streams of evidences:

- Stakeholders exchanges (EFSA);
- Literature
- (scientific; industry reports).

Remarks:

- Microorganism safety - EU Legislative/Regulatory screening assessment made.

Proposal to be refined (smaller AHWG?)

Evidences wanted!

(e.g. **Microorganisms sp; formulations; safety assessments**)

HSC, LD	(I) Identification: all intentionally added micro-organisms shall have an American Type Culture Collection (ATCC) number, belong to a collection of an International Depository Authority (IDA) or have had their DNA identified in accordance with a 'Strain identification protocol' (using 16S ribosomal DNA sequencing or an equivalent method). (II) Safety: — ~~a~~All intentionally added micro-organisms shall belong to ~~both of the following:~~ Risk Group I as defined by Directive 2000/54/EC of the European Parliament and of the Council ([179]) — biological agents at work, ~~— the Qualified Presumption of Safety (QPS) list issued by the European Food Safety Authority (EFSA).~~ — The outcome of a microbial risk assessment should be that the risk associated with the use of a product containing microorganisms is deemed as acceptable. (III) Absence of contaminants: pathogenic micro-organisms, as defined below, shall not be in any of the strains included in the finished product when screened using the indicated test methods or equivalent: — E. coli, test method ISO 16649-3:2005, — Streptococcus (Enterococcus), test method ISO 21528-1:2004, — Staphylococcus aureus, test method ISO 6888-1, — Bacillus cereus, test method ISO 7932:2004 or ISO 21871, — Salmonella, test method ISO6579:2002 or ISO 19250. (IV) All intentionally added micro-organisms shall not be genetically modified micro-organisms (GMMs). (V) Antibiotic susceptibility: all intentionally added micro-organisms shall be, with the exception of intrinsic resistance, susceptible to each of the five major antibiotic classes (aminoglycoside, macrolide, beta-lactam, tetracycline and fluoroquinolones) in accordance with the EUCAST disk diffusion method or equivalent. (VI) Microbial count: products in their in-use form shall have a standard plate count equal to or greater than 1×10^5 colony-forming units (CFU) per ml in accordance with ISO 4833-1:2014. (VII) Shelf life: the minimum shelf life of the product shall not be lower than 24 months and the microbial count shall not decrease by more than 10 % (measured in logarithmic scale) every 12
HSC	*Assessment and verification*: the applicant shall provide: (I) The name (to the strain) and identification of all micro-organisms contained in the product with ATCC or IDA numbers or documentation on DNA identification. (II)Documentation demonstrating that all micro-organisms belong to Risk Group I ~~and the QPS list~~ and documentation on the microbial risk assessment, certified by an independent third-party expert, where the risk associated with the intended use of the product is deemed as acceptable. (III) Test documentation demonstrating that the pathogenic micro-organisms are not present in the product. (IV) Documentation demonstrating that all micro-organisms are not GMMs. (V) Test documentation demonstrating that all micro-organisms are, with the exception of intrinsic resistance, susceptible to each of the five major antibiotic classes indicated. (VI) Test documentation of CFU per ml of in-use solution (for undiluted products, the dilution ratio recommended for 'normal' cleaning shall be used). (VII) Test documentation of CFU per ml of in-use solution every 12 months for a product stored until the end of its shelf life. (VIII) Test results from a third-party laboratory demonstrating the claimed actions of the micro-organisms and artwork of the packaging or a copy of the product's label highlighting any claims made on the actions of the micro-organisms. (IX) and (X) Artwork of the packaging or a copy of the product's label.

8. Criterion Excluded and Restricted substances
h) Microorganisms

Legislative assessment finding legislative guidance/precedents on the safety of microorganism used in detergent and cleaning products.

Legislation	Remarks on micro-organisms use	How safety is assessed?
Rev. Det. Reg. (COM(2023)217)	In scope (including function)	As per EUEL
Biological agents at work (Directive 2000/54/EC)	Partially in scope (workers)	Art 2 – groups by infection risk; Art 3 – Assessment of risks
REACH (Reg. (EC) No 1907/2006)	Out of scope (chemical substances registration)	NA
BPR (Reg. (EU) No 528/2012)	In scope BUT not function (Art 3 Definition; "… *action on or against harmful organisms*")	ECHA's AHWG on microorganisms?
General Product Safety Regulation (Reg. (EU) 2023/988	In scope BUT is generic (specific "enough" for the needs of biological risk assessment?)	Market surveillance authorities

2. Criterion Excluded and Restricted substances
h) Microorganisms

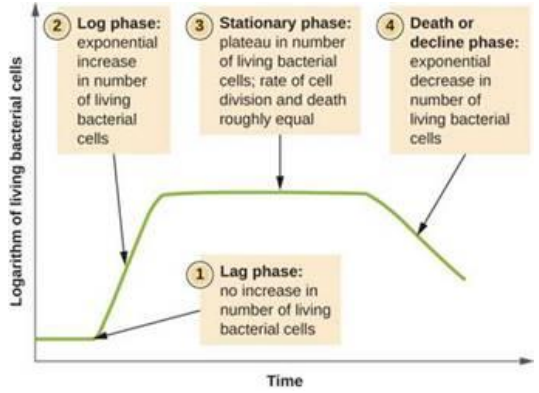
Changes overview:

- **Shell-life -** clarification thresholds units (log-scale)
- **QPS removed –** it is not a proof of safety (*for detergent products*)

(v) Antibiotic susceptibility: all intentionally added micro-organisms shall be, with the exception of intrinsic resistance, susceptible to each of the five major antibiotic classes (aminoglycoside, macrolide, beta-lactam, tetracycline and fluoroquinolones) in accordance with the EUCAST disk diffusion method or equivalent.

(vi) Microbial count: products in their in-use form shall have a standard plate count equal to or greater than 1×10^5 colony-forming units (CFU) per ml in accordance with ISO 4833-1:2014.

(vii) Shelf life: the minimum shelf life of the product shall not be lower than 24 months and the microbial count shall not decrease by more than 10 % (measured in logarithmic scale) every 12



EFSA | Open EFSA | EFSA Journal | Connect

efsa EUROPEAN FOOD SAFETY AUTHORITY | EN English | Calendar

About | Newsroom | Topics | Resources | Publications | Applications | Engage

Home / Topics

Qualified presumption of safety (QPS)

Last reviewed date: 10 January 2024 | 2 minutes read Share:

EFSA assesses the safety of microorganisms in the **applications it receives for market authorisation** of feed additives, food additives, food enzymes, food flavourings, *novel food* , and plant protection products ("regulated products").

QPS scope does not cover EUEL scope

A Qualified Presumption of Safety (*QPS*) status is the result of a pre-assessment that covers safety concerns for humans, animals and the environment. During this process, experts assess the *taxonomic identity* of the microorganism, the related *body of knowledge* and *potential safety concerns* .

Microorganisms that are not well defined, for which some safety concerns are identified or for which it is not possible to conclude whether they pose a safety concern to humans, animals or the environment are not considered suitable for QPS status and must undergo a full safety assessment.

Under safety concerns, even if in scope, full safety assessment required

https://www.efsa.europa.eu/en/topics/topic/qualified-presumption-safety-qps

(ii) Safety:

— ~~a~~All intentionally added micro-organisms shall belong to ~~both of the following:~~ Risk Group I as defined by Directive 2000/54/EC of the European Parliament and of the Council ([179]) — biological agents at work,

~~— the Qualified Presumption of Safety (QPS) list issued by the European Food Safety Authority (EFSA).~~

— The outcome of a microbial risk assessment should be that the risk associated with the use of a product containing microorganisms is deemed as acceptable.

(iii) Absence of contaminants: pathogenic micro-organisms, as defined below, shall not be in any of the strains included in the finished product when screened using the indicated test methods or equivalent:

HSC, LD

— E. coli, test method ISO 16649-3:2005,
— Streptococcus (Enterococcus), test method ISO 21528-1:2004,
— Staphylococcus aureus, test method ISO 6888-1,
— Bacillus cereus, test method ISO 7932:2004 or ISO 21871,
— Salmonella, test method ISO6579:2002 or ISO 19250.

"Limited" list (*according to experts*) – directions for expanding it?

Assessment and verification

(ii)Documentation demonstrating that all micro-organisms belong to Risk Group I ~~and the QPS list~~ and documentation on the microbial risk assessment, certified by an independent third-party expert, where the risk associated with the intended use of the product is deemed as acceptable.

(iii) Test documentation demonstrating that the pathogenic micro-organisms are not present in the product.

Microbial safety assessment (considerations)

- Best "tool" for EUEL?
- Independent third-party to be defined
- Clearer delimitation of "acceptability"

European Commission

2. Criterion Excluded and Restricted substances
h) Microorganisms

Points for discussion 15 – Micro-organisms

Stakeholders are invited to reply the following consultation question:

- Question 35 (**Q35**) – do you support requiring a microbial risk assessment as a proof of safety? If not, do you have any proposal to assess microbial containing products safety?
- Question 36 (**Q36**) – do you have any suggestion to complement the microorganisms list in (iii)
- Question 37 (**Q37**) – do you support the threshold set (*equal or greater than* 1×10^5 *CFU*) to prove product performance via microbial counts? If not, could you share reasons?
- Question 38 (**Q38**) – do you support current shelf-life requirements (vi)? Do you consider it represents properly also products falling under LD scope?

Questions / Comments?

European Commission

3. Criterion ““Packaging” [Part 1 of 2; (New) Recycled material content and WUR]

European Commission

. Criterion Packaging
(New) Recycled material content

Circular Economy Action plan focuses on sectors that consume most resources and have a high potential for circularity.

Packaging and Packaging Waste Directive (**PPWD**) promotes the use of recyclable and reusable materials. The **revised PPWD** proposal **includes mandatory targets for recycled content** of packaging

The **new sub-criterion introduces percentages of recycled content** in detergent products packaging to reduce the environmental impact of packaging , support the EU's circular economy objectives and ensure a response to developments in the political framework.

Main streams of evidences:

- Political framework
- Other ecolabels
- Stakeholders information

Blue Angel:

- 80% PCR for paper/cardboard in primary packaging
- 70% PCR for paper/cardboard in secondary packaging.
- 70% PCR for PET
- 50% PCR others plastics

Nordic Swan:

- 90% PCR for paper/cardboard
- 50% PCR for plastics

3. Criterion Packaging
(New) Recycled material content

Requirements for paper/cardboard

NEW sub-criterion (x) recycled materials content	
	The criterion sets requirements for sales packaging (primary packaging) and grouped packaging (secondary packaging).
LD	a) Paper/cardboard used for packaging
DD HDD	Sales packaging (primary packaging) made of paper and/or cardboard shall contain a minimum 80 % of recycled material.
HSC	Grouped packaging (secondary packaging) made of paper and/or cardboard shall contain a minimum 70 % of recycled material.
	Cardboard packaging for liquid products is exempt from this requirement.
	The remaining share (100% minus recycled content percentage) of paper and/or cardboard used for the sales and grouped packaging shall be covered by valid Sustainable Forestry Management certificates issued by an independent third-party certification scheme such as FSC, PEFC or equivalent. The certification bodies issuing Sustainable Forestry Management certificates shall be accredited/recognised by that certification scheme.

3. Criterion Packaging
(New) Recycled material content

Requirements for plastics

	b) Plastic used for packaging
LD DD HDD	Sales packaging (primary packaging) made of PET shall contain a minimum of 70% recycled material (PCR - recycled plastic made from post-consumer recycled), other plastics (e.g. HDPE) shall contain a minimum of 50% recycled material (PCR). All closures and trigger closures (e.g. removable closures and pump dosers) and pouches are exempt from this requirement.
HSC	Recycled content and recyclability of sales packaging (primary packaging) and grouped packaging (secondary packaging) shall be indicated on the sales packaging. The recycled content stated on the packaging shall refer to the total weight (body, closure, label/sleeve and trigger closure).

3. Criterion Packaging
(New) Recycled material content

Assessment and Verification

Assessment and verification: The applicant shall submit: (1) a signed declaration of compliance specifying the percentages of recycled content in the sales (primary) and grouped (secondary) packaging when relevant; (2) a high resolution photograph of the sales packaging where information regarding recycled content appear clearly.

The applicant shall provide audited accounting documents that demonstrate that the remaining share (100% minus recycled content percentage) of the paper and/or cardboard used for the sales and grouped packaging is defined as certified material according to valid FSC, PEFC or equivalent schemes. The audited accounting documents shall be valid for the whole duration of the EU Ecolabel license.

Recycled content shall be verified by complying with the EN 45557 or ISO 14021. Plastic recycled content in the packaging shall comply with chain of custody standards such as ISO 22095 or EN 15343. Equivalent methods may be accepted if considered equivalent by a third-party, and shall be accompanied by detailed explanations showing compliance with this requirement and related supporting documentation. Invoices demonstrating the purchase of the recycled material shall be provided.

3. Criterion Packaging
(New) Recycled material content

Points for discussion 16 – Recycled materials content

Stakeholders are invited to reply the following consultation question:

— Question 39 (**Q39**) – Should there be a requirement on recyclability of plastic in the grouped packaging (secondary packaging)?

Revision of the EU Ecolabel criteria for
DETERGENT AND CLEANING PRODUCTS

BREAK (15')

ETIQUETTE FOR VIRTUAL MEETING PARTICIPANTS

- **Please indicate "NAME OF YOUR ORGANIZATION + YOUR FULL NAME"**
- **MUTE YOUR MIC AND SWITCH OFF you CAMERA (unless you have the floor)**
- **USE THE CHAT only to ask for the FLOOR (write "FLOOR" in the chat), and COMMENT only ORALLY**

Agenda

Day 2: Wednesday 13th March 2024

		SCHEDULE
1.	Opening of virtual room and welcome and recap of previous day	09:00 – 09:15
2.	EU Ecolabel criteria for detergents – Criterion "Excluded and Restricted substances" [Part 2 of 2; targeting sub-criterions (e), (f), (g) and (h)]	09:15 – 10:45
	Break (15 min)	10:45 – 11:00
3.	EU Ecolabel criteria for detergents – Criterion **"Packaging"** [Part 1 of 2; (New) Recycled material content and WUR]	11:00 – 11:45
4.	EU Ecolabel criteria for detergents – Criterion "Packaging" [Part 2 of 2; Design for Recycling; Products sold in spray bottles; Packaging take back system]	11:45 – 12:30
	Lunch break (1 hour)	12:30 – 13:30
5.	EU Ecolabel criteria for detergents – Criterions "Fitness for use"; "Automatic dosing system", "**User information"** and **"Information appearing on the EU Ecolabel"**	13:30 – 14:00
6.	Conclusion, next steps and closure of the meeting	14:00 – 14:30

European Commission

3. Criterion Packaging Weight/utility ratio (WUR)

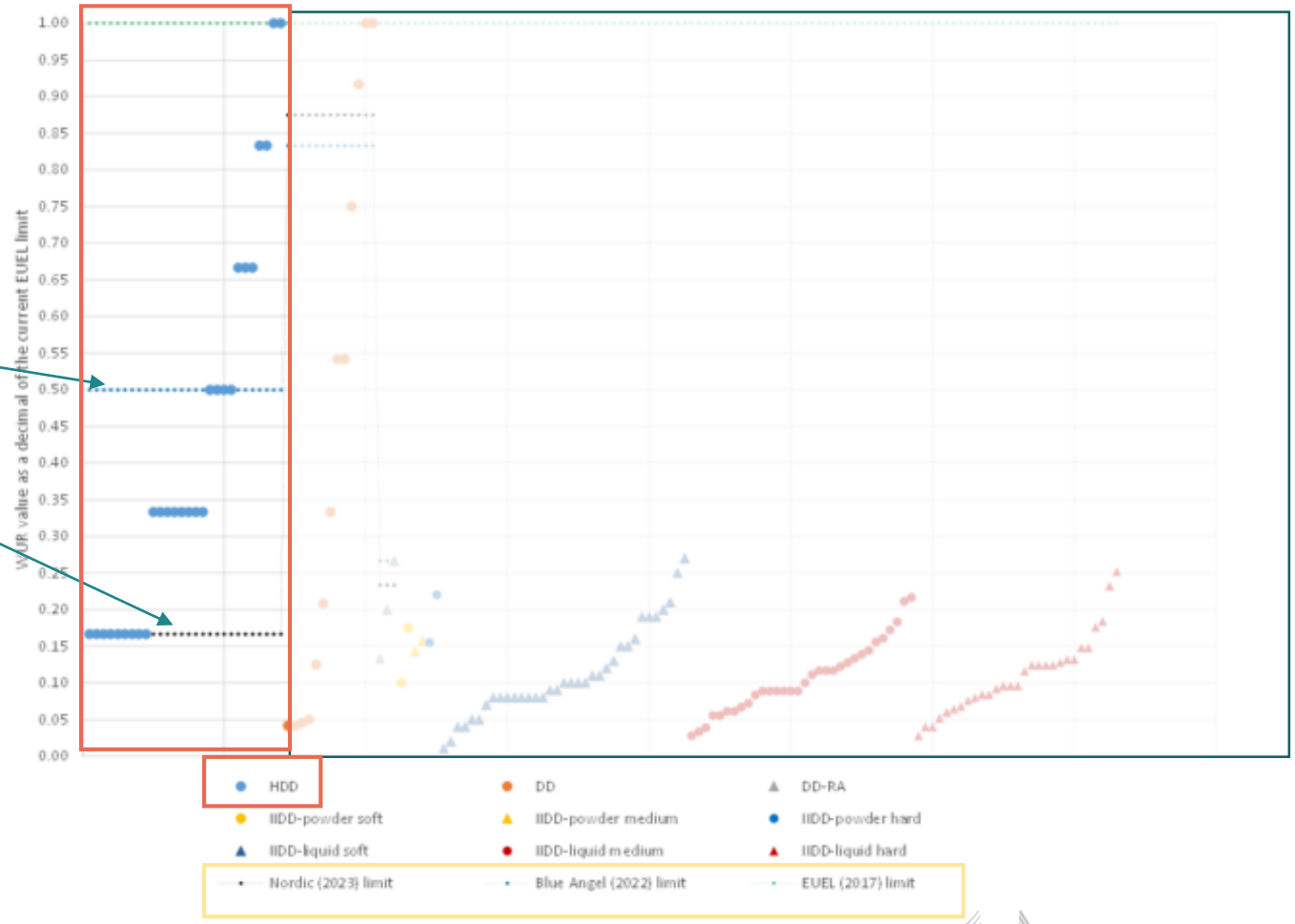
.

The weight-utility ratio serves the purpose of reducing packaging volume and promoting the use of recycled materials, thereby aiding in the reduction of unnecessary transportation and air emissions, leading to lower CO_2 emissions. The WUR measures the amount of packaging used to deliver a specific product benefit.

ALL	$$\mathbf{WUR} = \sum \frac{(W_i + U_i)}{(D_i + R_i)}$$ Where: W_i: weight (g) of the sales packaging (primary packaging) (i); U_i: weight (g) of non-post-consumer recycled packaging in the sales packaging (primary packaging) (i). $U_i = W_i$ unless the applicant can prove otherwise; D_i: number of reference doses contained in the sales packaging (primary packaging) (i); R_i: refill index. R_i = 1 (packaging is not reused for the same purpose) or R_i = 2 (if the applicant can document that the packaging component can be reused for the same purpose and they sell refills).

3. Criterion Packaging Weight/utility ratio (WUR)

Relative units (WUR data / EUEL WUR threshold)



<u>Available data confirmed “room” for setting stricter limits</u>

Blue Angel limits 50% lower and (0.3 g/L)

Nordic Swan around 83% lower (0.1 g/L)

		Product type	WUR (g/l of washing water)
HDD		Hand dishwashing detergent	~~0,6~~0,3

Proposals to be refined

European Commission

3. Criterion Packaging Weight/utility ratio (WUR)

Available data confirmed “room” for setting stricter limits

DD

Blue Angel limits around 17% lower and (2.0 g/L)

Nordic Swan around 12.5% lower (2.1 g/L)

Rinse aids

Blue Angel limits around 73% lower and (0.4 g/L)

Nordic Swan around 77% lower (0.35 g/L)

		Product type	WUR (g/wash)
DD		Dishwasher detergents	~~2,4~~ 2,0
		Rinse aids	~~1,5~~ 0,4

Proposals to be refined

Few data points for rinse aid

Relative units (WUR data / EUEL WUR threshold)

European Commission

3. Criterion Packaging Weight/utility ratio (WUR)

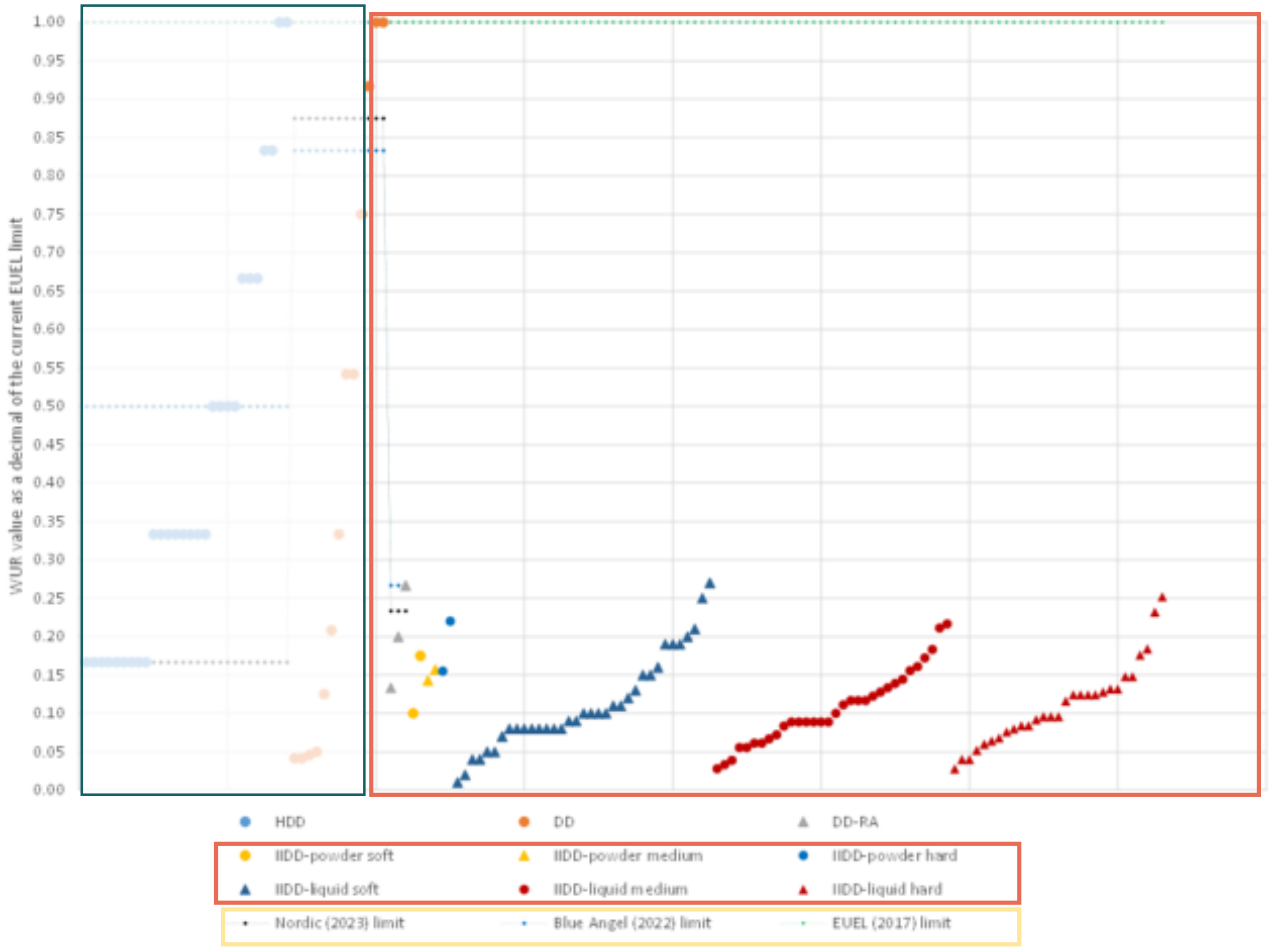
		Water hardness Product type	Soft < 1,5 mmol $CaCO_3$/l (g/l of washing solution)	Medium 1,5-2,5 mmol $CaCO_3$/l (g/l of washing solution)	Hard > 2,5 mmol $CaCO_3$/l (g/l of washing solution)
IIDD		**Powders**	0,8	1,4	2,0
		Liquids	1,0	1,8	2,5

Further evidences required

Data need

No direct comparison with other ISO Type I scheme.

Relative units (WUR data / EUEL WUR threshold)



European Commission

3. Criterion Packaging Weight/utility ratio (WUR)

Available data confirmed “room” for setting stricter limits

LD powder
Blue Angel in line with EUEL

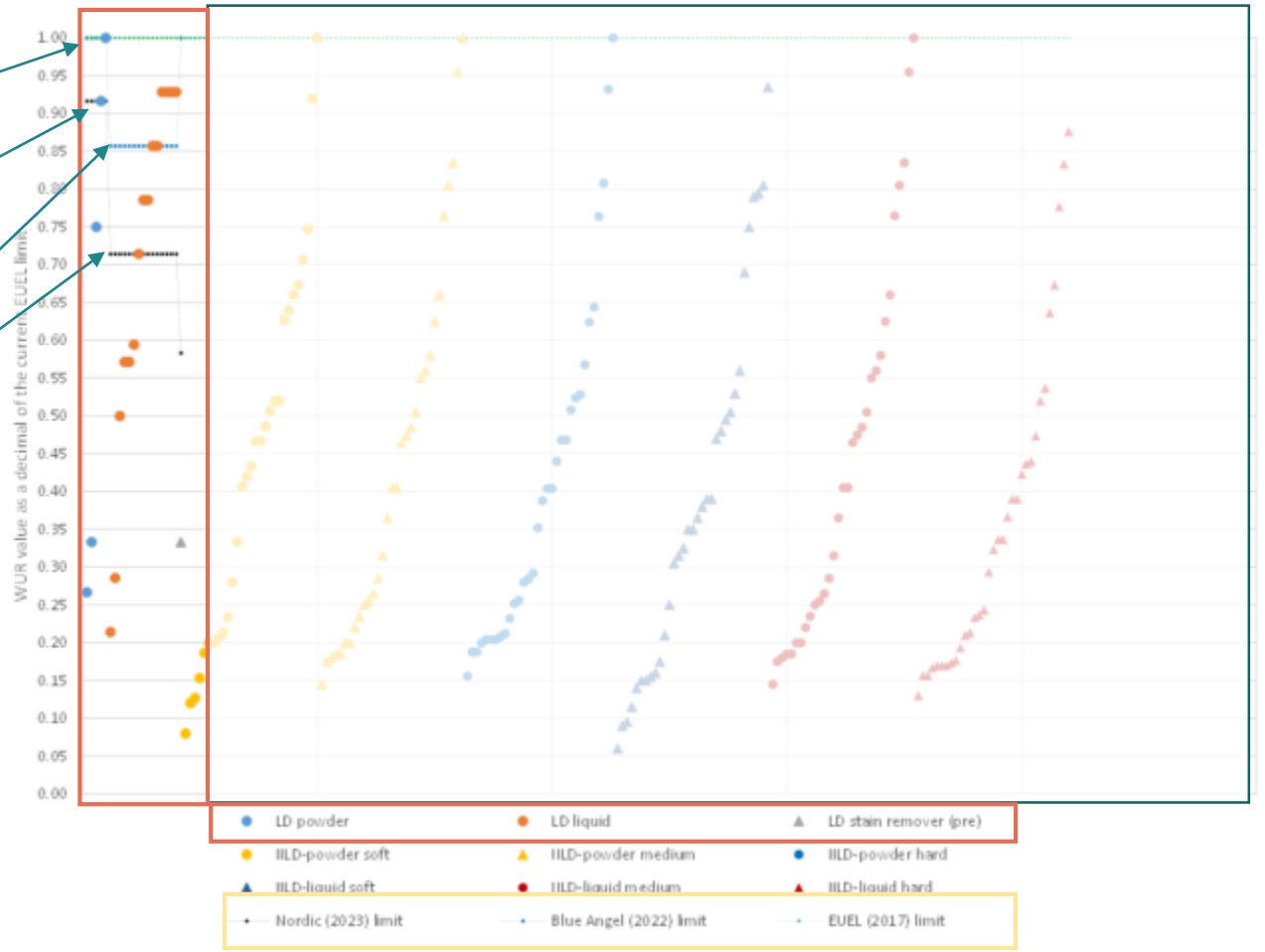
Nordic Swan around 10% lower (1.0 g/L)

LD liquid
Blue Angel limits around 15% lower and (1.2 g/L)

Nordic Swan around 29% lower (1.1 g/L)

		Product type	WUR (g/kg of laundry)
LD		Powder laundry detergents Laundry detergents in tablets or capsules	~~1,2~~1,0
		Liquid/gel laundry detergents (not in tablets or capsules)	~~1,4~~1,1
		Stain remover (pre-treatment only)	1,2

Relative units (WUR data / EUEL WUR threshold)



European Commission

3. Criterion Packaging Weight/utility ratio (WUR)

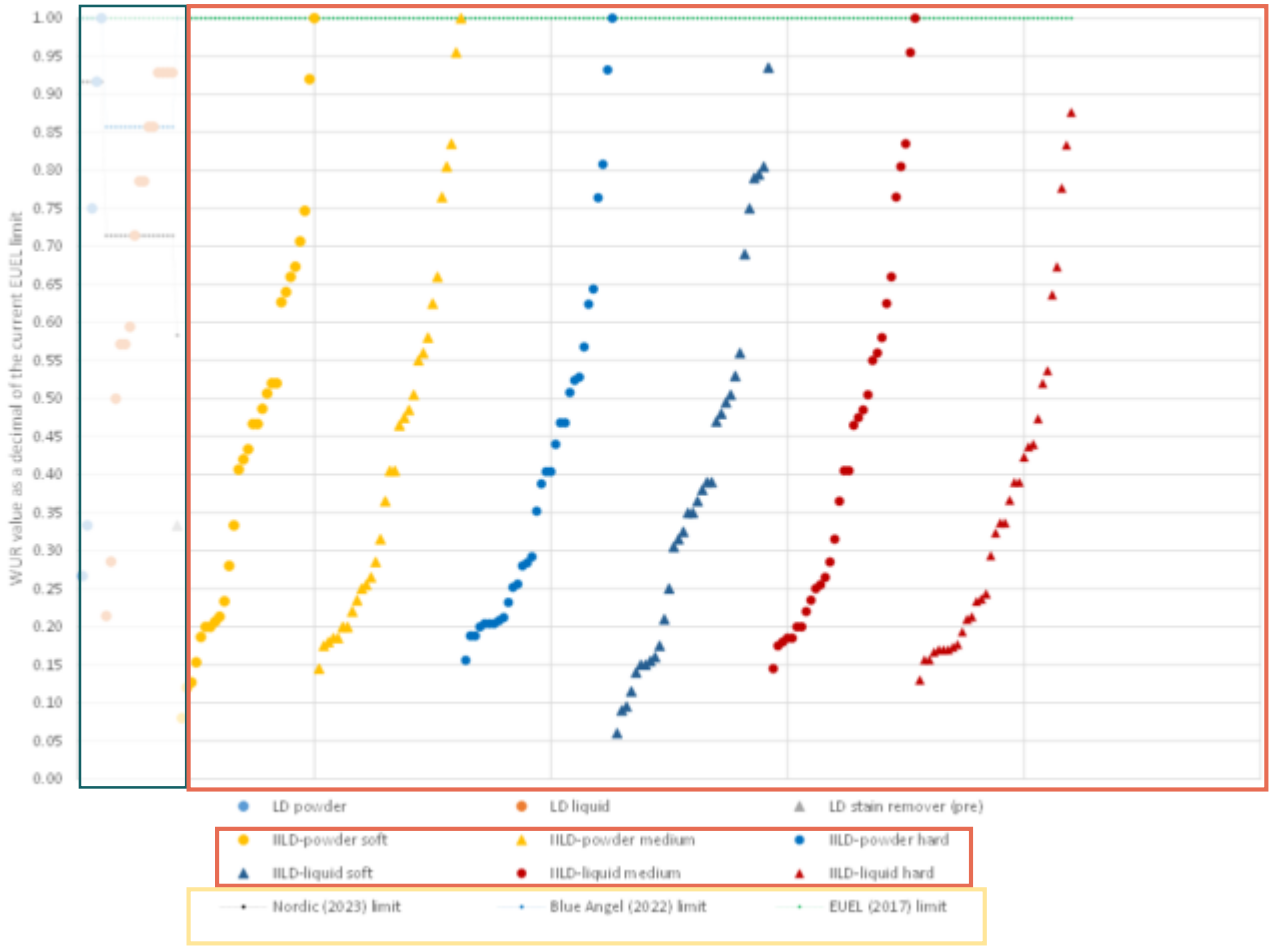
IILD				
	Water hardness **Product type**	**Soft** **< 1,5 mmol $CaCO_3$/l** **(g/kg of laundry)**	**Medium** **1,5-2,5 mmol $CaCO_3$/l** **(g/kg of laundry)**	**Hard** **> 2,5 mmol $CaCO_3$/l** **(g/kg of laundry)**
	Powders	1,5	2,0	2,5
	Liquids	2,0	2,5	3,0

Further evidences required

Data need

No direct comparison with other ISO Type I scheme.

Relative units (WUR data / EUEL WUR threshold)



European Commission

3. Criterion Packaging Weight/utility ratio (WUR)

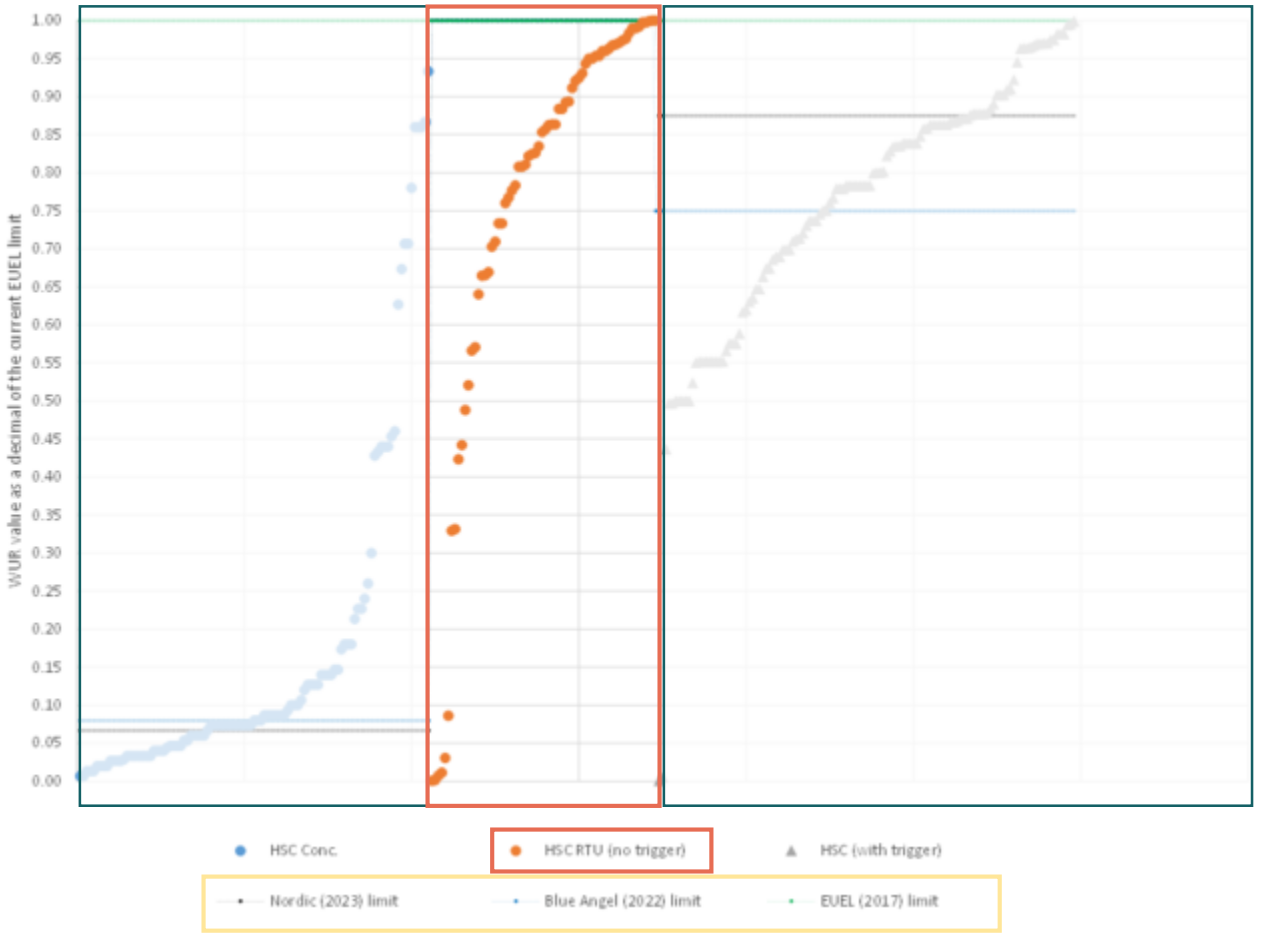
		Product type	WUR (g/l of cleaning solution)
HSC		Undiluted products	~~15~~1,0
		RTU products	150
		RTU products sold in bottles with trigger sprays	~~200~~175

HSC RTU (no trigger)

EUEL in line with Blue Angel and Nordic Swan

Proposals to be refined

Relative units (WUR data / EUEL WUR threshold)



European Commission

3. Criterion Packaging Weight/utility ratio (WUR)

		Product type	WUR (g/l of cleaning solution)
HSC		Undiluted products	~~15~~1,0
		RTU products	150
		RTU products sold in bottles with trigger sprays	~~200~~175

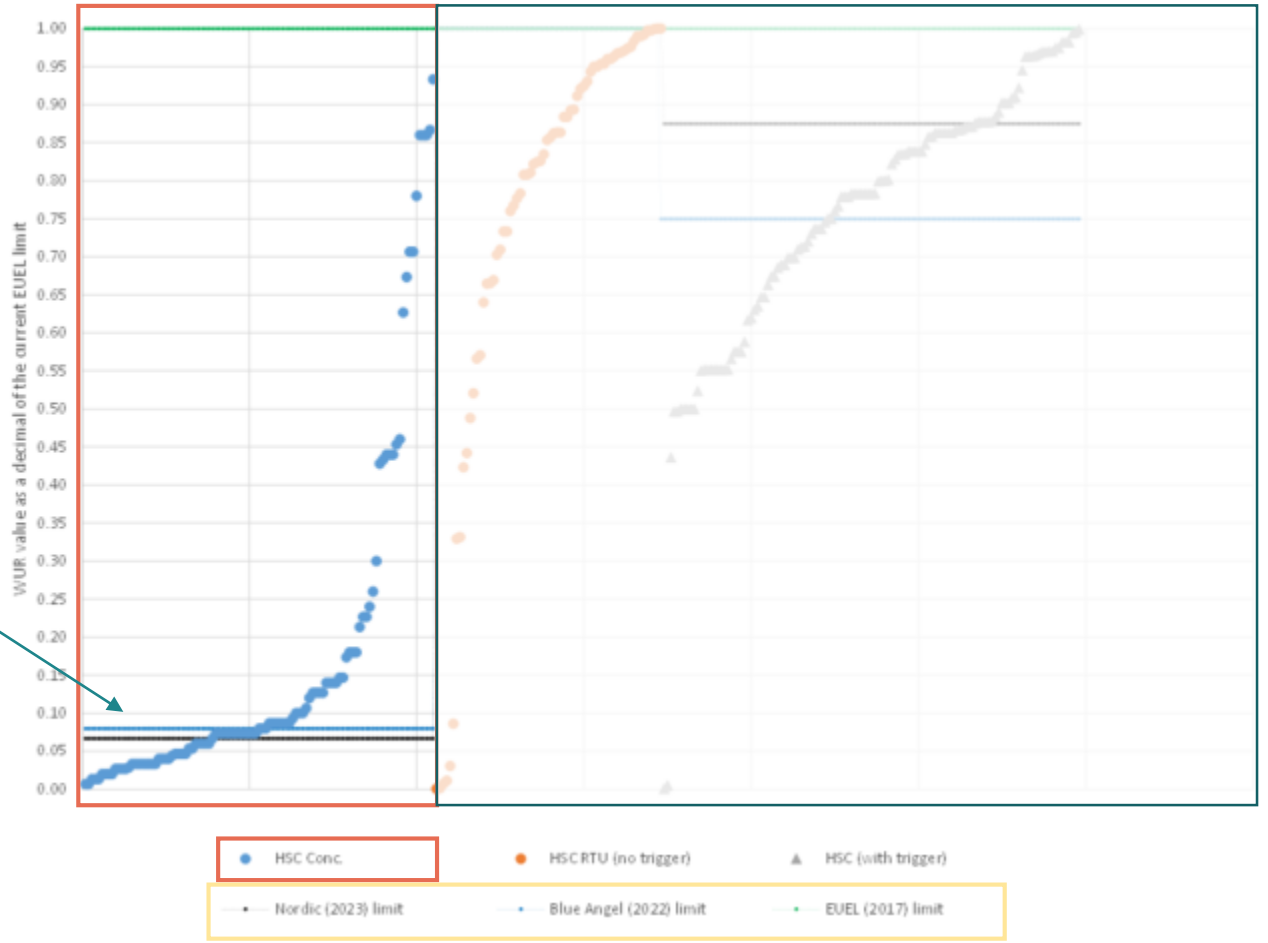
Available data confirmed “room” for setting stricter limits

HSC Undiluted

Blue Angel and Nordic Swan have much stricter limits (90% lower than EUEL)

Alignment with Nordic Swan

Relative units (WUR data / EUEL WUR threshold)



European Commission

3. Criterion Packaging Weight/utility ratio (WUR)

		Product type	WUR (g/l of cleaning solution)
HSC		Undiluted products	~~15~~1,0
		RTU products	150
		RTU products sold in bottles with trigger sprays	~~200~~175

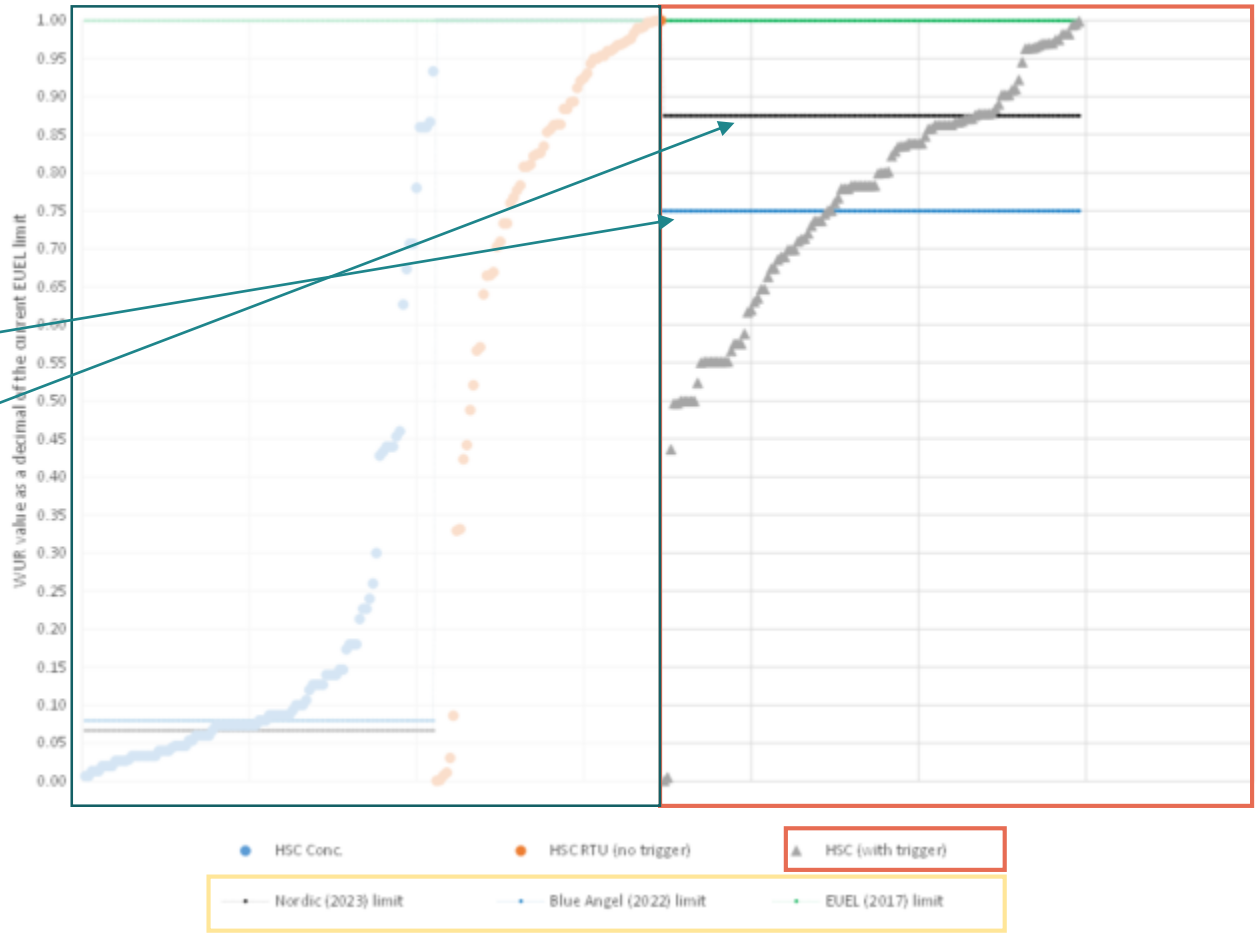
HSC RTU (with trigger)

Blue Angel (25% lower than EUEL)

Nordic Swan (approx. 13 % lower than EUEL)

Alignment with Nordic Swan

Relative units (WUR data / EUEL WUR threshold)



European Commission

4. Criterion Packaging Design for Recycling

The Design for Recycling requirement highlights the importance of creating packaging that enables easy recycling by minimizing impurities and material combinations that impede the separation of different materials or diminish the quality of the recycled material.

Packaging element	**Excluded materials and components (*1)**
Body/Material	— Dyed black, using soot-carbon-based pigments — Pouches/bag laminates with layer of different materials (composite packaging)

4. Criterion Packaging Design for Recycling

Label or sleeve	— PS label or sleeve in combination with a PET, PP or HDPE ~~bottle~~ packaging — PVC label or sleeve in combination with a PET, PP or HDPE ~~bottle~~ packaging — PETG label or sleeve in combination with a PET ~~bottle~~ packaging — PET label or sleeve (except LDPET (< 1 g/cm3)) in combination with a PET ~~bottle~~ packaging — Any other plastic materials for sleeves/labels with a density > 1 g/cm^3 used with a PET ~~bottle~~ packaging — Any other plastic materials for sleeves/labels with a density < 1 g/cm3 used with a PP or HDPE ~~bottle~~ packaging (except for PP labels and polyolefins (PO) sleeves used in combination with a PP packaging or PE labels and PE sleeves used in combination with a HDPE packaging) — Labels or sleeves that are metallised or are welded to a packaging body (in mould labelling) — Glued cellulose-based labels for PP, HDPE, LDPE, PS packaging, that cannot be removed in cold washing — Non-removable washable adhesive applications (in water or alkaline at 80° C) for PET bottle

European Commission

4. Criterion Packaging Design for Recycling

Closure	— PS closure in combination a with a PET, HDPE or PP ~~bottle~~ packaging — PVC closure in combination with a PET, PP or HDPE ~~bottle~~ packaging — PETG closures or closure material with a density > 1 g/cm^3 in combination with a PET ~~bottle~~ packaging — Closures made of metal, glass, EVA which are not easily separable from the ~~bottle~~ packaging — Closures made of silicone. Silicone closures with a density < 1 g/cm^3 in combination with a PET ~~bottle~~ packaging and silicone closures with a density > 1 g/cm^3 in combination with ~~PEHD~~ HDPE or PP ~~bottle~~ packaging are exempted. — Metallic foils or seals which remain fixed to the ~~bottle~~ packaging or its closure after the product has been opened
Barrier coatings	Polyamide, functional polyolefin, EVOH provided with tie layers made by a polymer different that the one used for the packaging body, metallised and light blocking barriers

4. Criterion Packaging
Take-back system

Proposed sub-criterion (x) packaging take-back systems	
HSC, IIDD, IILD	If the product is delivered in packaging that is part of a take-back system for a product, that product is exempted from the requirements set out in points (*WUR)* and (*Design for Recycling*) of Criterion X.
HSC, IIDD, IILD	*Assessment and verification:* the applicant shall provide a signed declaration of compliance along with relevant documentation describing or demonstrating that a take-back system has been put in place for the packaging.

Points for discussion 18 – Packaging take-back systems

Stakeholders are invited to reply the following consultation questions:

— Question 43 (**Q43**) – Would you support the extension of this criterion to other product groups such as LD, DD and HDD? Please specify why.

Agenda

Day 2: Wednesday 13th March 2024

		SCHEDULE
1.	Opening of virtual room and welcome and recap of previous day	09:00 – 09:15
2.	EU Ecolabel criteria for detergents – Criterion "Excluded and Restricted substances" [Part 2 of 2; targeting sub-criterions (e), (f), (g) and (h)]	09:15 – 10:45
	Break (15 min)	10:45 – 11:00
3.	EU Ecolabel criteria for detergents – Criterion **"Packaging"** [Part 1 of 2; (New) Recycled material content and WUR]	11:00 – 11:45
4.	EU Ecolabel criteria for detergents – Criterion "Packaging" [Part 2 of 2; Design for Recycling; Products sold in spray bottles; Packaging take back system]	11:45 – 12:30
	Lunch break (1 hour)	12:30 – 13:30
5.	EU Ecolabel criteria for detergents – Criterions "Fitness for use"; "Automatic dosing system", "**User information"** and **"Information appearing on the EU Ecolabel"**	13:30 – 14:00
6.	Conclusion, next steps and closure of the meeting	14:00 – 14:30

European Commission

5. Criterion

“Fitness for use”;
“Automatic dosing system”
“User information”
“Information appearing on the EU Ecolabel”

5. Criterion – Fitness for use

Call for experts!
FfU AHWG

Proposals to be developed

— Revise standards cited/used in *fitness for use* protocols and update according to latest versions.

— Consider expansion of protocols scope for example consider other fabric materials in addition of cotton able to better or complementary represent current user behaviour with regards to clothing.

— Revise and improve protocols on aspects such as how representative are the set of stains used.

Proposed criterion (x) fitness for use	
ALL	The product shall have a satisfactory wash performance at the lowest temperature and dosage recommended by the manufacturer for the water hardness in accordance with
DD	the most updated IKW standard test ([196]) or the most updated standard EN 50242/EN 60436 as modified in 'Framework performance test for dishwasher detergents' available on the EU Ecolabel website ([197]).
HDD	the 'Framework for the performance test for hand dishwashing detergents' available on the EU Ecolabel website ([198]).
IIDD	the 'Framework performance test for industrial and institutional dishwasher detergents' available on the EU Ecolabel website ([199])
IILD	the 'Framework for performance testing for industrial and institutional laundry detergents' available on the EU Ecolabel website ([200]).
LD	'EU Ecolabel protocol for testing laundry detergents' ([201]) or 'EU Ecolabel protocol for testing stain removers' ([202]), as appropriate, available on the EU Ecolabel website.
ALL	*Assessment and verification*: the applicant shall provide documentation demonstrating that the product has been tested under the conditions specified in
DD	the IKW standard or framework and that the results showed that the product achieved at least the minimum cleaning performance required.
HDD, IILD	the framework and that the results showed that the product achieved at least the minimum wash performance required.
HSC, IIDD,	the framework and that the results showed that the product achieved at least the minimum cleaning performance required.
LD	the protocol and that the results showed that the product achieved at least the minimum wash performance required.
ALL	The applicant shall also provide documentation demonstrating compliance with the laboratory requirements included in the relevant harmonised standards for testing and calibration laboratories, if appropriate. An equivalent test performance may be used if equivalence has been assessed and accepted by the competent body.

5. Criterion – Information appearing on the EU Ecolabel

Changes overview:

Aligned with (potential) scope change on LD washing temperature

Proposed criterion (x) information appearing on the EU Ecolabel	
ALL	The logo should be visible and legible. The EU Ecolabel registration/licence number shall appear on the product and it shall be legible and clearly visible. The applicant may choose to include an optional text box on the label that contains the following text:
DD, HDD, HSC, IIDD, IILD	— Limited impact on the aquatic environment, — Restricted amount of hazardous substances, — Tested for cleaning performance.
LD	— Limited impact on the aquatic environment, — Restricted amount of hazardous substances, — Tested for wash performance at ~~3~~20 °C (*). (*) If the product was tested at 15 ~~or 20~~ °C in Criterion 7, the applicant may change the temperature indicated accordingly.

6. Conclusion, next steps and closure of the meeting

FEEDBACK:

- **TR1 –** Written comments only via BATIS
- **PR –** via JRC template via email
- (JRC-B5-DETERGENTS@ec.europa.eu)
- **FURTHER INPUTS WELCOMED !!!!**

DEADLINE 03/04/24

NEXT STEPS:

- **2nd AHWG (+ 2nd draft criteria version)** – expected Q4 2024 (**tbc**)

- **SMALLER AHWG –** JRC will launch a call for interested experts:
  - *Fitness for use;*
  - *Microbial containing products*
  - *Industrial and institutional*
  - *Biodegradability?*
  - *Derogations?*

European Commission

Questions / Comments?

European Commission

Thank you !!!!!

European Commission