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|  | EUROPEAN COMMISSION  JOINT RESEARCH CENTRE  **Directorate B – Fair and Sustainable Economy**  *Circular Economy and Sustainable Industry* |

**EU Ecolabel criteria for Detergent products: Hazardous substance criteria**

Substitution information and Derogation request form

**1. Common information requirements**

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| **To be treated as confidential?** | Yes No |

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| **Contact name** |  |
| **Organisation** |  |
| **Email** |  |
| **Telephone No.** |  |
| **Supplementary documents attached** |  |

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| **1a. Chemical substance name(s)** |  |
| **1b. CAS, EC or Annex VI numbers** |  |
| **1c. Current EU regulatory status** |  |
| **1d. CLP Classifications from the EU Ecolabel hazard listing[[1]](#footnote-1)** |  |
| **1e. Proportional contribution to final product classification (for mixture ingredients)** |  |
| **1f. Existing scientific evidence and risk assessments relating to the substance** |  |
| **1g. Functional need and significance to the final product** |  |
| **1h. Typical concentration in the final product and specific components or articles** |  |

**2. Additional information required for derogation requests**

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| **2a. The relevance of the hazard classification(s) along the life cycle of the product (e.g. manufacturing, use, disposal)** |  |
| **2b. Market availability of alternatives and the potential for substitution** |  |

**3. Additional information required about substitutes**

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| ***3a. Comparative evaluation of environmental performance*** |  |
| **3b. The relevance of the hazard substitution along the life cycle of the product (e.g. manufacturing, use, disposal)** |  |
| **3c. Compliance with product performance and functional requirements** |  |
| **3d. Market diffusion and technical maturity** |  |

**ONCE COMPLETED, PLEASE, SEND TO** [JRC-B5-DETERGENTS@ec.europa.eu](mailto:JRC-B5-DETERGENTS@ec.europa.eu)

1. The relevant Commission Decision for the product group should be checked, but in general, the restricted CLP classifications are grouped as follows:

   Group 1 hazards: Category 1A or 1B carcinogenic, mutagenic and/or toxic for reproduction (CMR): H340, H350, H350i, H360, H360F, H360D, H360FD, H360Fd, H360Df.

   Group 2 hazards: Category 2 CMR: H341, H351, H361, H361f, H361d, H361fd, H362; Category 1 aquatic toxicity: H400, H410; Category 1 and 2 acute toxicity: H300, H310, H330; Category 1 aspiration toxicity: H304; Category 1 specific target organ toxicity (STOT): H370, H372.

   Group 3 hazards: Category 2, 3 and 4 aquatic toxicity: H411, H412, H413; Category 3 acute toxicity: H301, H311, H331; Category 2 STOT: H371, H373.

   The purpose of grouping is to aid the derogation process, for example, a much stronger case needs to be presented for derogation of a group 1 hazard than a group 3 hazard.

   For product groups where exposure routes to skin or inhalation pathways are foreseen, the H317 and H334 hazards would be placed amongst the Group 2 hazards. [↑](#footnote-ref-1)