

# Revision of the EU Ecolabel criteria for **DETERGENT AND CLEANING PRODUCTS**

11 June 2024

WEBEX SESSION

## **ETIQUETTE FOR VIRTUAL MEETING PARTICIPANTS**

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Revision of the EU Ecolabel criteria for **DETERGENT AND CLEANING PRODUCTS**

# *Fitness for Use [FfU] sub-Ad Hoc Working Group (sub-AHWG)*

1<sup>st</sup> sub-AHWG Meeting; 11<sup>th</sup> June 2024; Virtual (webex)



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Directorate B – Fair and Sustainable Economy  
Circular Economy and Sustainable Industry

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- 1. Introduction – Sub-AHWG overview.**
- 2. FfU sub-AHWG - questions / discussion.**
- 3. Any other business (AOB).**

# 1. Introduction – Sub-AHWG overview.

# 1. The EU Ecolabel 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]

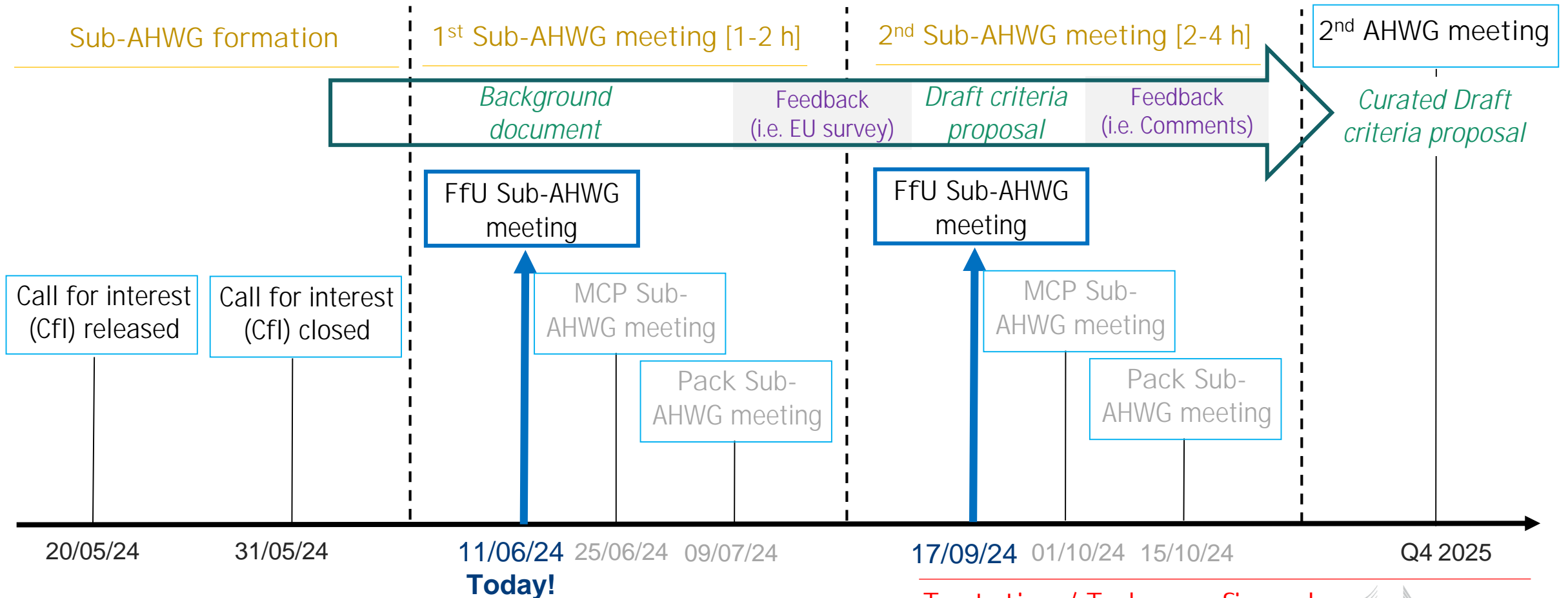


- [Industrial and institutional laundry detergents](#) (IILD)

C(2017) 4245 [OJ L 180, 12.7.2017, p. 79–96]

Validity expiry date 31/12/26

# 1. Sub-AHWGs “steps” (process) and timeline



Tentative / To be confirmed

# 1. *Fitness for Use* criterion frameworks

*Aim – Ensuring that products perform as expected  
(washing/cleaning efficiency)*


LD (1)	<i>EU Ecolabel protocol for testing laundry detergents</i>
	<i>EU Ecolabel protocol for testing stain removers</i>
IILD	<i>Framework for performance testing for industrial and institutional laundry detergents (2)</i>
DD	<i>Framework performance test for dishwasher detergents (3)</i> (most updated version of EN 50242/EN 60436 or IKW standard test (4) as modified by this DD EU Ecolabel Framework)
IIDD	<i>Framework for performance testing for industrial and institutional dishwasher detergents (5)</i>
HDD	<i>Framework for testing performance for hand dishwashing detergents (6)</i>
HSC	<i>Framework for testing the performance of hard surface cleaners (7)</i>

<sup>[1]</sup> Both test for LD in same document -> [https://environment.ec.europa.eu/document/download/557d8ab5-4e75-41a4-a901-1548be7f685d\\_en?filename=fitness%20performance%20LD\\_V1.7\\_June%202023.pdf](https://environment.ec.europa.eu/document/download/557d8ab5-4e75-41a4-a901-1548be7f685d_en?filename=fitness%20performance%20LD_V1.7_June%202023.pdf)  
<sup>[2]</sup> [https://environment.ec.europa.eu/document/download/789ae131-ee3a-4cdd-bfcd-6389aa3d8caa\\_en?filename=fitness%20performance%20IILD\\_V1.1\\_June%202023\\_0.pdf](https://environment.ec.europa.eu/document/download/789ae131-ee3a-4cdd-bfcd-6389aa3d8caa_en?filename=fitness%20performance%20IILD_V1.1_June%202023_0.pdf)  
<sup>[3]</sup> [https://environment.ec.europa.eu/document/download/ad5b72eb-dab6-4a64-9a37-53d028fec8d7\\_en?filename=Framework%20Fitness%20Performance%20-%20Dishwasher%20Detergent.pdf](https://environment.ec.europa.eu/document/download/ad5b72eb-dab6-4a64-9a37-53d028fec8d7_en?filename=Framework%20Fitness%20Performance%20-%20Dishwasher%20Detergent.pdf)  
<sup>[4]</sup> [https://www.ikw.org/fileadmin/IKW\\_Dateien/downloads/Haushaltspflege/2016\\_EQ\\_Dishwasher\\_Detergents\\_Part\\_B\\_Update\\_2015\\_aktualisiert.pdf](https://www.ikw.org/fileadmin/IKW_Dateien/downloads/Haushaltspflege/2016_EQ_Dishwasher_Detergents_Part_B_Update_2015_aktualisiert.pdf)  
<sup>[5]</sup> [https://environment.ec.europa.eu/document/download/2a924067-033a-449d-808d-7586475a8cfc\\_en?filename=fitness\\_performance\\_IIDD\\_20180111.pdf](https://environment.ec.europa.eu/document/download/2a924067-033a-449d-808d-7586475a8cfc_en?filename=fitness_performance_IIDD_20180111.pdf)  
<sup>[6]</sup> [https://environment.ec.europa.eu/document/download/e0f5e99e-082e-4a70-91ee-70d7d9d00062\\_en?filename=Framework%20Fitness%20Performance%20-%20HDD.pdf](https://environment.ec.europa.eu/document/download/e0f5e99e-082e-4a70-91ee-70d7d9d00062_en?filename=Framework%20Fitness%20Performance%20-%20HDD.pdf)  
<sup>[7]</sup> [https://environment.ec.europa.eu/document/download/462d278a-2140-4bd2-bad2-fe0cf4a7b37a\\_en?filename=Fitness%20Performance%20-%20Hard%20Surface%20Cleaning%20Products\\_rev1.2.pdf](https://environment.ec.europa.eu/document/download/462d278a-2140-4bd2-bad2-fe0cf4a7b37a_en?filename=Fitness%20Performance%20-%20Hard%20Surface%20Cleaning%20Products_rev1.2.pdf)

# 1. FfU sub-AHWG supporting documents

## FfU frameworks compilation

EU Ecolabel criteria for detergent and cleaning products  
 Fitness for Use (FfU) criterion  
 Protocols / Frameworks proving product performance



*Revision of the EU Ecolabel criteria for detergent and cleaning products*

All product groups protocols/frameworks to prove compliance with the criterion  
**Fitness for Use (FfU)**

The product groups (PGs) under the scope of the EU Ecolabel criteria under revision are:


• "Dishwasher detergents"	DD
• "Industrial and institutional automatic dishwasher detergents"	IIDD
• "Laundry detergents"	LD
• "Industrial and institutional laundry detergents"	ILLD
• "Hand dishwashing detergents"	HDD
• "Hard surface cleaning products"	HSC

This document is a compilation of existing (in force) criteria protocols/frameworks proving compliance with the FfU criterion. It has been created for ease of access to members of the sub-AHWG or FfU. There might be minor formatting changes from this merged document to the separated protocols/frameworks files but in all cases the valid text of the existing criteria will always be accessible via the EU Ecolabel website. The aforementioned protocols/frameworks are:

LD (*)	EU Ecolabel protocol for testing laundry detergents
	EU Ecolabel protocol for testing stain removers
ILLD	Framework for performance testing for industrial and institutional laundry detergents (*)
DD	Framework performance test for dishwasher detergents (*) (most updated version of EN 50242/EN 60436 or IKW standard test (*) as modified by this DD EU Ecolabel Framework)
IIDD	Framework for performance testing for industrial and institutional dishwasher detergents (*)
HDD	Framework for testing performance for hand dishwashing detergents (*)
HSC	Framework for testing the performance of hard surface cleaners (*)

1 Both test for LD in same document -> <https://ec.europa.eu/eurostat/tgm/table.do?tab=table&init=1&language=en&code=sdg12.2.1>  
 2 <https://ec.europa.eu/eurostat/tgm/table.do?tab=table&init=1&language=en&code=sdg12.2.1>  
 3 <https://ec.europa.eu/eurostat/tgm/table.do?tab=table&init=1&language=en&code=sdg12.2.1>  
 4 <https://ec.europa.eu/eurostat/tgm/table.do?tab=table&init=1&language=en&code=sdg12.2.1>  
 5 <https://ec.europa.eu/eurostat/tgm/table.do?tab=table&init=1&language=en&code=sdg12.2.1>  
 6 <https://ec.europa.eu/eurostat/tgm/table.do?tab=table&init=1&language=en&code=sdg12.2.1>  
 7 <https://ec.europa.eu/eurostat/tgm/table.do?tab=table&init=1&language=en&code=sdg12.2.1>

## FfU background discussion



*Revision of the EU Ecolabel criteria for detergent and cleaning products*

Background paper priming discussions of the working sub-group on  
**Fitness for Use (FfU)**

*This background document aims to provide the context and guide on discussion points to be addressed by during the working sub-group lifetime.*

Draft for discussion



# 1. FfU frameworks compilation

## [LD] Revised EU Ecolabel protocol for testing laundry detergents

### Framework/Protocol

#### Content

- 0. Background
- 1. Test criteria
- 2. Laboratory requirements to conduct the testing
- 3. Materials and conditions
- 4. Methods
- 5. Evaluation
- 6. Results and reporting
- Annex 1. Example

#### Abbreviations

HDD	Heavy duty detergent	DTI	Dye transfer inhibition
CSD	Colour safe detergent	SBL	Soil ballast load
LDD	Light duty detergent	PC	Sodium percarbonate
SR	Stain removal	TAED	Tetra acetyl ethylene diamine
BDW	Basic degree of whiteness	PVP	Polyvinylpyrrolidone
CM	Colour maintenance	CO	Cotton
PA	Polyamide	PES	Polyester
PES/CO	Polyester/cotton	WO	Wool
SI	Silk		

#### 0. Background

This test protocol serves as a means of proof to show compliance with the criterion 'Fitness for use' of the Commission Decision (EU) 2017/1218 of 23 June 2017 establishing EU Ecolabel criteria for 'Laundry detergents'. The product shall be fit for use, meeting the needs of users.

The test is for products that fall under the scope of the product group 'Laundry detergents', which includes laundry detergents and stain removers. For each of these products, a different performance test is published, as specified in the Section 3.1 'Range of application'.

The performance test for laundry detergents shall show that laundry detergents achieve good washing performance according to soil and stain removal, basic degree of whiteness, colour maintenance and dye transfer inhibition criteria. The product shall meet the requirements for wash performance set out in all the criteria listed in Section 1.

#### 1. Test criteria

- soil and stain removal (SR)
- basic degree of whiteness (BDW)
- colour maintenance (CM)
- dye transfer inhibition (DTI)

### Line numbers

- For ease of use.
- If different, the text of protocols in EU Ecolabel website prevail.
- Line numbers – for more precise referencing of comments.
- Table/Figure numbers – unchanged (as on original documents).
- Version displayed

# 1. FfU background document



EUROPEAN COMMISSION  
JOINT RESEARCH CENTRE  
Directorate B – Fair and Sustainable Economy  
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## 4 Laundry detergent (LD)

### 4.1 Mapping of aspects

- Lowering the effectiveness temperature from 30°C to 20°C requires a new product with equivalent performance.
- The availability of certain soils and soil ballast is not stable, leading to delays in product development.
- The test protocol for soil removal requires a global reflection (e.g. some stains pass the test without using detergent).
- Review detergents formulation (European IEC targets) to update to market changes in recent years.
- Revise generic formulation (e.g. IEC A\*), especially for liquid LD and compare against same format (liquid Vs liquid, powder versus powder).
- The cycle time and machine models used are not in line with the current market.
- The poor performance of LD is attributed to using ingredients with lower Critical Dilution Volume (CDV) values (to ensure criteria compliance) at the cost of using “less efficient” (performing) ingredients. Identified performance concerns to revise: Basic degree of whiteness & anti-greying; Black maintenance.

### 4.2 Potential actions

- Update protocol to fit current market trends and Ecolabel criteria, particularly with regards to:
  - soil/stains removal,
  - reference detergent (IEC A\*, inclusive format - liquid/solid);
  - washing machine conditions
- If applicable, adjust to latest scope changes (e.g. from 30°C to 20°C; microorganisms-containing products) to demonstrate LD performance.
- If relevant, identify ingredients leading to decreased performance.

### 4.3 Questions

This section is a set of questions on the particular aspect/product group of interest. These questions might be accompanied by short rationale. Sub-AHWG members are invited/encouraged to reply and complement any key aspect/s missed by JRC in the accompanying short rationales.

**Q8 [LD] – Do you consider that the test criteria for “soil and stain removal (SR)” (line 31, page 2) requires revision (not fit for purpose)? If yes, please provide a reasoned answer including specific aspects**

**Q9 [LD] – Should the stain sets (line 196, page 8, Table 10 & line 525, page 20, Table 18) be updated/modified? If so, please be specific about stains and their traits, inclusive which should be considered/excluded.**

**Q10 [LD] – Should the reference detergent (line 219, page 10, Table 13 & line 556, page 23, Table 20) be updated, inclusive of addition of new product formats (i.e. liquid, solid, etc)? If so, in which way? Please, where possible, refer to standards containing such information and/or share a proposal with JRC.**

Since the last revision of the EU Ecolabel criteria for detergent and cleaning products, the technological and market reality has changed. This implies new formats entering into/gaining ground in the market for which existing protocols/frameworks for testing performance might not necessarily be fully tailored to. The formulation cited as the reference detergent in existing protocols is based on the IEC 60456:2010 standard. If it required to change it, then the updated version of this standard (EN 60456:2016/A12:2023) or consider other standards including reference detergents formulations for a range of product formats/types (i.e. ISO 6330:2021, reference detergents 1-7; Annexes I – N) could be useful. In this sense, we encourage sub-AHWG participants to reply, if possible, using standards and falling this with specific proposals on how (and why) to amend the reference detergent in LD performance testing.

## Mapping of aspects

identified by JRC/stakeholders as requiring further assessment  
(Sources: Focused questionnaire; Written comments to TR1)

## Potential actions

which could lead to improved *Fitness for use* criterion versions

## Questions

## FOCUS OF TODAY'S PRESENTATION

aiming to inform JRC on general/specific aspects to which stakeholders are invited to reply. They are numbered correlatively (full list at the end).

# 1. FfU sub-AHWG - summary

## ***FfU sub-AHWG overview***

Aim/s: improving existing testing protocols (e.g. HSC products) and/or develop new ones (e.g. scope expansion - microorganisms) to ensure technical performance and its verification of detergent and cleaning products at EU level.

Scope: Criterion *Fitness for use*; All PGs (LD; IILD, DD, IIDD, HDD and HSC).

Transparency: all discussions held in the dedicated sub-AHWG meetings and documents used will be publicly available (i.e. minutes; background paper).

Target audience: Experts with experience in carrying out tests (e.g. testing laboratories) or in requesting them and doing parallel in-house tests (e.g. industry – license holders) are especially welcomed here.

Sub-AHWG composition: The total number of sub-AHWG members registered was 31 (as 31/05/24), with industry accounting for the greatest share (22/31), followed by *Other* entities (e.g. testing laboratories; consultancies), Competent / ecolabelling bodies (4/31) and lastly, NGOs (1/31).

## 2. FfU sub-AHWG – questions / discussion.

## 2. Questions – All products

**Q1 [All] – Do you consider feasible to set generic formulations for all product groups? If not, please reasoned arguments why.**

### Short rationale accompanying some questions

JRC acknowledges the value and importance of having a common reference formulation against which testing detergent and cleaning products performance, thus it considers this as the preferred option. Equally, JRC acknowledges that the higher the granularity (e.g. generic formulations by country) the more precise the results of performance testing would be yet this would not be feasible resources-wise (*Note that JRC inquires about how to update particular PG generic formulations within each PG dedicated section*). However, in general terms, we understand that the nature of particular products or sub-product types/formats could make difficult setting such generic formulations (e.g. industrial and institutional products). Consequently, we welcome experts view on the feasibility of setting generic formulations on all products groups.

**Q2 [All] – In the absence of generic formulations, should reference products be restricted to be EU Ecolabelled? If not, please reasoned arguments why.**

Compliance with EU Ecolabel criteria implies restricted choice on the ingredients available (via criteria such as *Excluded and Restricted substances* and/or *Toxicity to Aquatic organisms*) compared to non-EU ecolabelled detergent and cleaning products. This can have a direct impact with regards to performance range of each product type profile, as some ingredients available to non-EU ecolabelled products might not be available to EU Ecolabelled ones. In other words, the formulations range available for each type of product profile can be different and, consequently, it would be more accurate to use reference products which share the same conditions/constraints. Hence, we would like to hear from experts about

**Q3 [All] – Should “water” be considered/added as an additional reference product for performance testing purposes?**

There have been testimonies on cleaning products performing as or worse than using “water” (*Note that JRC’s understands “water” as an aqueous solution containing mostly soluble salts as reflecting local water supply conditions rather than pure water*). In addition, is common analytical practice to use controls, inclusive of “water” (as the main solvent/carrier used). In this sense, including “water” as control could be beneficial but simultaneously would increase the analytical resources required. Consequently, JRC welcome inputs to better understand the trade-offs, inclusive relevance for different product groups. In addition and if to be considered, proposals about the pre-set (generic) characteristics that “water” as reference product would need to comply with are welcomed.

**Q4 [All] – With regards to products’ performance testing, which are the formats (e.g. liquid; solid) that are missing in existing EU Ecolabel protocols/frameworks? Please, indicate product group/s and which format/s.**

**Q5 [All] – With regards to secondary claims, do you consider that proving compliance with them can be improved? If so, please indicate the product group/s, the type of secondary claim/s and a reasoned explanation.**

**Q6 [All] – Should the section “X Laboratory requirements to conduct the testing” present in all EU Ecolabel protocols / frameworks be modified? If so, in which way?**

As part of the mapping exercise carried by JRC with stakeholders inputs, different views were shared about whether testing should be allowed in internal (e.g. manufacturer’s), external or both types of laboratories. This is reflected in a section common to all detergents protocols/frameworks (“X Laboratory requirements to conduct the testing”) which also cover other laboratory requirements. Note than in existing criteria (in general terms) both internal and external laboratories are allowed.

**Q7 [All] – Do you have any further remark applicable/ resource relevant to all product groups under the scope of the EU Ecolabel criteria for detergent and cleaning products?**

Open question at end of each product group category

# 2. Questions – LD

**Q8 [LD]** – Do you consider that the test criteria for “soil and stain removal (SR)” (line 31, page 2) requires revision (not fit for purpose)? If yes, please provide a reasoned answer including specific aspects

**Q9 [LD]** – Should the stain sets (line 196, page 8, Table 10 & line 525, page 20, Table 18) be updated/modified? If so, please be specific about stains and their traits, inclusive which should be considered/excluded.

**Q10 [LD]** – Should the reference detergent (line 219, page 10, Table 13 & line 556, page 23, Table 20) be updated, inclusive of addition of new product formats (i.e. liquid, solid, etc)? If so, in which way? Please, where possible, refer to standards containing such information and/or share a proposal with JRC.

Since the last revision of the EU Ecolabel criteria for detergent and cleaning products, the technological and market reality has changed. This implies new formats entering into/gaining ground in the market for which existing protocols/frameworks for testing performance might not necessarily be fully tailored to. The formulation cited as the reference detergent in existing protocols is based on the IEC 60456:2010 standard. If it required to change it, then the updated version of this standard (EN 60456:2016/A12:2023) or consider other standards including reference detergents formulations for a range of product formats/types (i.e. ISO 6330:2021, reference detergents 1-7; Annexes I – N) could be useful. In this sense, we encourage sub-AHWG participants to reply, if possible, using standards and failing this with specific proposals on how (and why) to amend the reference detergent in LD performance testing.

**Q11 [LD]** – Should detergent dosage (line 215, page 10, Table 12 & line 567, page 24) be modified? If yes, please provide a reasoned response.

**Q12 [LD]** – Should any further aspect about the reference detergent be added/considered (e.g. solubility residues requirement)?

**Q13 [LD]** – Do you consider fit-for-purpose the washing machines types and washing cycles programmes (lines 71-82, pages 3-4 & lines 487 – 497, pages 18-19)? If not, please provide a reasoned reply including specific technical details.

**Q14 [LD]** – Do you consider that existing EU Ecolabel protocols/frameworks should be modified/complemented during this revision for better testing of the performance of laundry detergents products containing microorganisms (these being the origin of the washing function) ? If so, please provide a reasoned answer on why and how the performance of such products could be tested.

JRC has identified that there are already laundry detergent products in the market containing microorganisms, as reflected in TR1 (See TR1 lines 524 – 569, pages 24-25). However, this trend still seems not widespread (niche product) and evidences in the public domain (that JRC accessed) do not currently lead to an accurate and full picture of this market. In addition, fitness for use protocols/frameworks do not account for this type of product and their mode of washing/cleaning action. Considering the former, JRC is considering whether a tailored method / complementing existing is necessary at this stage.

**Q15 [LD]** – Are you aware of any ingredient/substance that are “less efficient” or that lead to decreased performance?

**Q16 [All]** – Do you have any further remark or resource relevant to the LD product group?

Table 13. Reference detergents

Type of detergent	Reference detergent	Ingredient	% content	Tolerance (+/-)	CAS n.		
HDD	Regular standard powder detergent IEC P (that can serve as reference for a detergent to wash white fabrics). This standard detergent is distributed as three separate components (because of stability of storage) with the following composition: - 82% IEC P BASE powder with enzyme and foam inhibitor (= IEC-A* BASE powder see table below) - 15% sodium percarbonate - 3% bleach activator tetra-acetythylenediamine (TAED)	linear sodium alkyl benzene sulfonate	11,4	0,5	25155-30-0		
		ethoxylated fatty alcohol C <sub>12-14</sub> (7EO)	6,1	0,3	68439-50-9		
		sodium soap (tallow soap)	4,2	0,2	308075-99-2		
		foam inhibitor concentrate, 12% silicon on inorganic carrier	5,1	0,3	68989-22-0		
		sodium aluminum silicate zeolite 4A (80% active substance)	36,7	1	70955-01-0		
		sodium carbonate	15,1	1	497-19-8		
		sodium salt of a copolymer from acrylic and maleic acid (sokalan CPS)	3,1	0,2	60472-42-6		
		sodium silicate (SiO <sub>2</sub> :Na <sub>2</sub> O = 3.3:1)	3,9	0,2	1344-09-8		
		carboxymethylcellulose	1,6	0,1	9004-32-4		
		phosphonate (25% active acid)	3,6	0,2	22042-96-2		
		protease	0,5	0,5	9014-01-1		
		sodium sulfate	rest	rest	7757-82-6		
		LDD		Ingredient	% technical grade	Tolerance (+/-)	CAS n.
				fatty alcohol ethoxylate C <sub>12-14</sub> (EO=7) <sup>1</sup>	35	0,5	68213-23-0
		CSD		low foaming fatty alcohol C <sub>12-14</sub> with approx 4mol EO and approx 5 moles PO (ethyleneoxide/higher alkylene oxide -co-polymer) <sup>2</sup>	15	0,3	68439-51-0
sodium dodecyl sulfonate <sup>3</sup>	7,5			0,2	68411-30-3		
		modified polycarboxylate (suitable for liquid detergents) <sup>4</sup>	15	0,3			
		ethanol	5	0,1	64-17-5		
		distilled water add to 100%	rest				
		Manufacturing process: 1. Mix fatty alcohol ethoxylate C12/14 (EO=7) and sodium dodecyl sulfonate heating to 40 °C 2. When the mixture will be homogenized, add low foaming fatty alcohol ethoxylate. Mix and homogenize 3. Add ethanol 4. Add modified polycarboxylate and mix 5. Finally, add water (until 100%) The bottle shall be agitated before use Dosage, power or liquid LDD: 35ml/wash cycle					
		Reformulation of the IEC P BASE reference detergent according to IEC 60456 formulation					
		Dosage: 70g IEC P BASE + 1ml PVP (PVP VI, Sokalan HP 56 K)					

## 2. Questions – IILD / IIDD

**Q17 [IILD]** – Should the *Framework for testing performance on IILD* be modified/complemented? If so, please provide a reasoned response including a list of specific aspects, ideally with specific proposal / resources (e.g. testing protocols, testing centres carrying the test out) for JRC consideration.

The existing framework for performance testing of IILD is currently “flexible” with regards to some testing elements (e.g. laboratory or user test; market or generic formulation as reference product, soiling level). The understanding is that this flexibility is required for products in the industrial and institutional sphere, as they are highly tailored to the intended function and sector of use. However, this same flexibility could be the source of heterogeneity in terms of carrying out and verifying this performance testing, not to mention the additional resources that it takes (both for laboratories and Competent Bodies) to determine and accept the protocols used and the results generated. In this sense, JRC considers that work on improving and/or developing protocols could be required and/or could be beneficial. JRC encourage participants to share as much detailed information as possible, especially with regards to aspects that can be fixed in the protocol (e.g. reference detergent) protocols accepted & testing centres and standards followed. The final aim is to streamline the analytical and verification steps without compromising the accuracy of the performance testing.

**Q18 [IILD]** – In relation to multi-component IILD, is there any testing aspect missing or that should be complemented? If so, please provide a reasoned response listing which aspects should be considered (e.g. efficacy target for IILD containing softeners)

**Q19 [IILD]** – Do you have any further remark or resource relevant to the IILD product group?

**Q24 [IIDD]**– Should the *Framework for testing performance on IIDD* be modified/complemented? If so, please provide a reasoned response including a list of specific aspects, ideally with specific proposal / resources (e.g. testing protocols, testing centres carrying the test out) for JRC consideration.

The existing framework for performance testing of IIDD is currently “flexible” with regards to some testing elements (e.g. laboratory or user test; market or generic formulation as reference product, soiling level). The understanding is that this flexibility is required for products in the industrial and institutional sphere, as they are highly tailored to the intended function and sector of use. However, this same flexibility could be the source of heterogeneity in terms of carrying out and verifying this performance testing, not to mention the additional resources that it takes (both for laboratories and Competent Bodies) to determine and accept the protocols used and the results generated. In this sense, JRC considers that work on improving and/or developing protocols could be required and/or could be beneficial. JRC encourage participants to share as much detailed information as possible, especially with regards to aspects that can be fixed in the protocol (e.g. reference detergent) protocols accepted & testing centres and standards followed. The final aim is to streamline the analytical and verification steps without compromising the accuracy of the performance testing.

**Q25 [IIDD]** – Do you have any further remark or resource relevant to the IIDD product group?

## 2. Questions – DD

**Q20 [DD]** – Do you consider that updating the protocol according to the latest version of IEC60436:2015 (as EN60436:2020) would solve the identified issues (i.e. outdated dishwasher machines models, reference detergent formulation)? If not, could you please provide a reasoned answer including a list of aspect not being addressed by this standard, ideally suggesting complementary standards.

The updated version of the IEC60436 (as EN60436:2020) has relevant changes in aspects that are relevant to the framework for DD performance testing (e.g. detergent type and dosage) which could potentially address the identified improvement needs in the DD protocol.

**Q21 [DD]** – Complementarily to Q20 and if you consider that IEC60436 formulation should be revised/complemented, do you have any proposal? If so, please share resources containing such formulations and/or provide a reasoned response on how IEC's formulation should/could be revised.

**Q22 [DD]** – Do you have any suggestion/proposal on how to ensure flexibility with regards to dishwasher machine characteristics (e.g. washing cycle). If so, please provide a reasoned response.

**Q23 [DD]** – Do you have any further remark or resource relevant to the DD product group?



## 2. Questions – HDD

Q26 [HDD] – Do you consider that degreasing capacity should be added to the framework for testing HDD performance? If so, could you please provide a reasoned response on how to do so, ideally referring to standards where such aspect is evaluated.

Q27 [HDD] – Similarly to Q26, do you consider that solid formulas should be added to the framework for testing HDD performance? If so, could you please provide a reasoned response, ideally referring to standards where such aspect is evaluated.

Q28 [HDD] - Should the reference detergent (line 1127, page 38, [Table 1](#)) be updated, inclusive of addition of new product formats (i.e. solid)? If so, in which way? Please, where possible, refer to standards containing such information and/or share a proposal with JRC.

Q29 [HDD] – Do you have any further remark or resource relevant to the HDD product group?

**Table 1. Reference generic formulation for testing hand dishwashing detergents**

Ingredient	% data as active content
Sec sodium alkane sulfonate (ex 60%)	10,80
Sodium lauryl ether sulfate 2EO (ex 70%)	2,80
Cocamidopropyl betaine (ex 30%)	1,20
Kathon DG (as received)	0,08
Water	Added to 100%

## 2. Questions – HSC products

**Q30 [HSC]** – Considering Q1 and Q2, inclusive of their rationales, would you consider feasible to request the use of generic formulations exclusively (meaning, excluding market reference)? If not, would consider feasible to restrict market reference products to EU Ecolabelled? Please, provide a reasoned response.

**Q31 [HSC]** – Do you consider that the generic formulations provided are fit for purpose? If not, could you provide a reasoned response listing those aspects that should be revised and, ideally, cite a standard and/or provide a proposal on how such generic formulations could/should be.

**Q32 [HSC]** – Related to Q30, how do “milder” formulations compare with “stronger” formulations? Please, provide references and/or examples where this affirmation can be qualitatively or quantitatively assessed.

Stakeholders affirmed that consumer cleaning patterns have changed, shifting from less frequent cleaning events (higher soiling level) with more “aggressive” chemicals (“stronger” formulations), to more frequent cleaning (lower soiling level) with less “aggressive” chemicals (“milder” formulations). To better understand this pattern and with the aim of reflecting products formulation changes (in response to consumer habits) in the ongoing revision, the JRC invite the FfU sub-AHWG participants to provide inputs in this regard.

**Q33 [HSC]** – Related to HSC products containing microorganisms, do you consider that these should be tested differently than “conventional” HSC products? If yes, please provide a reasoned answer indicating if the testing should be alternative (thus requiring new protocol) or if it should be complementary, for example to the claims made (long lasting/legacy cleaning) testing for the claim.

The existing criteria allows the use of microorganisms as part of HSC formulations for professional products and requires all HSC products, with and without microorganisms, to comply with the provisions stated in the criterion *Fitness for Use* (See Technical Report 1, lines 2179 – 2223, pages 110-114). However, in the criterion *Fitness for use* there are no specific/explicit protocols/provisions tailored to the nature of microbial containing products and the comparatively differential mode of action with “conventional” (purely chemically formulated; no microorganism used) HSC products (i.e. pooled effect of microorganisms breaking-down organic matter on surfaces via repeated application throughout time), other than proving the claims made. Whilst there are further complementary aspects (i.e. CFU level as indicator of performance) and these will be discussed in a dedicated sub-AHWGs about microbial containing products, it is considered important to hold this discussion also “here” (FfU sub-AHWG) so there is a clear view on the need to update the criterion *Fitness for Use* in this regard.

**Q34 [HSC]** – Related to kitchen and sanitary cleaners, to which aspects of the *Framework for testing performance for HSC products* would you attribute the reduced efficiency observed by some stakeholders/users on grease and limescale removal efficiency? Examples could be: the nature of the stains/soils used being non-realistic; the formulation profile of EU Ecolabel products, etc. Please, provide a reasoned response including a list of aspect and/or factors which are responsible for decreased efficiency or that could contribute to ensure/boost performance (within the scope of EU Ecolabel criteria)

**Q35 [HSC]** – Do you have any further remark or resource relevant to the HSC product group?

## 2. Next steps – Feedback & 2<sup>nd</sup> Meeting

- Feedback to questions (Q1 –Q35) via EU survey. Deadline for feedback is 02/07/24.
- The 2<sup>nd</sup> sub-AHWG is scheduled for 17/09/24 (tbc)
- Previous details to be send via email after this 1<sup>st</sup> sub-AHWG meeting (inclusive EU survey link).
- Prior to the 2<sup>nd</sup> sub-AHWG, a draft criteria proposal considering 1<sup>st</sup> sub-AHWG feedback & meeting details (date/time/meeting link) will be sent via email.

3. Any other business (AOB).

# Thank you for your attention!

## Questions?



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