

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

25 June 2024

WEBEX SESSION

## **ETIQUETTE FOR VIRTUAL MEETING PARTICIPANTS**

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

# *Microbial containing products [MCP]* Ad Hoc Working Sub-Group (sub-AHWG)

1<sup>st</sup> sub-AHWG Meeting; 25<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. MCP 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]

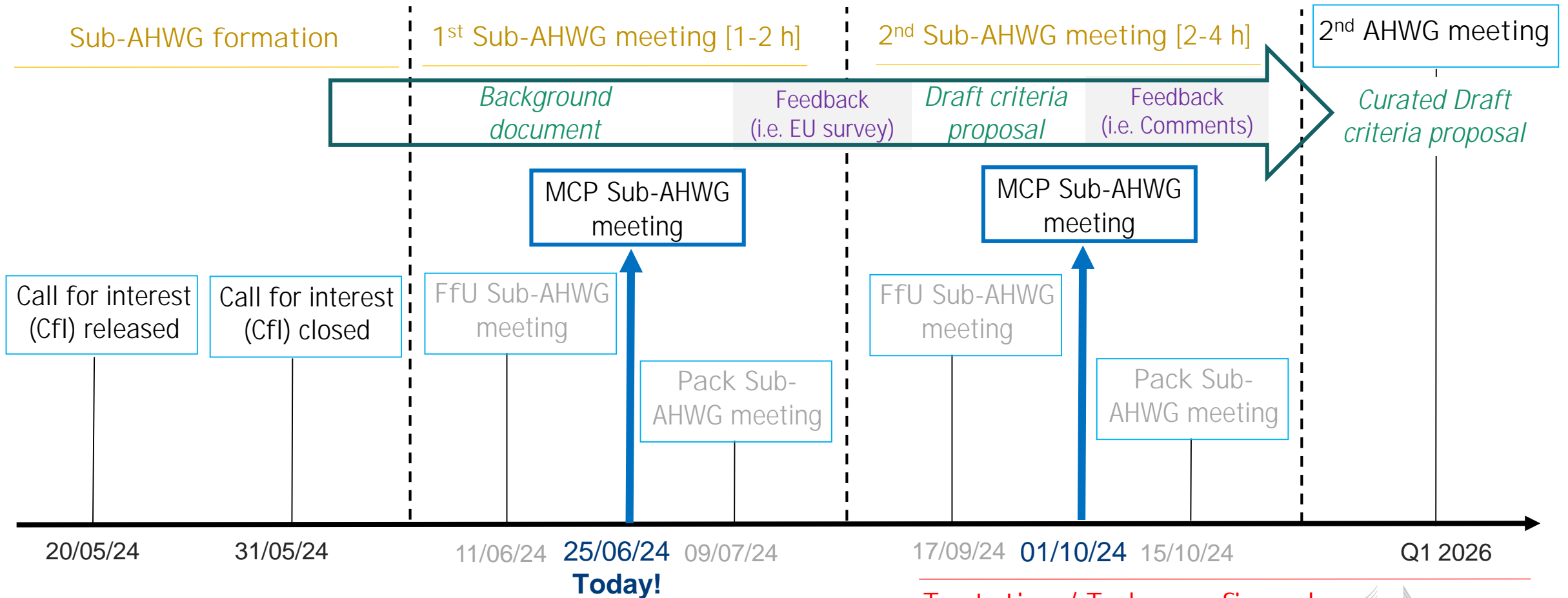


- [Industrial and institutional laundry detergents](#) (IILD)

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. Excluded and restricted substances criterion

The aim of this criterion is to exclude or limit toxic or harmful substances, so Ecolabelled product are the least environmental impactful product

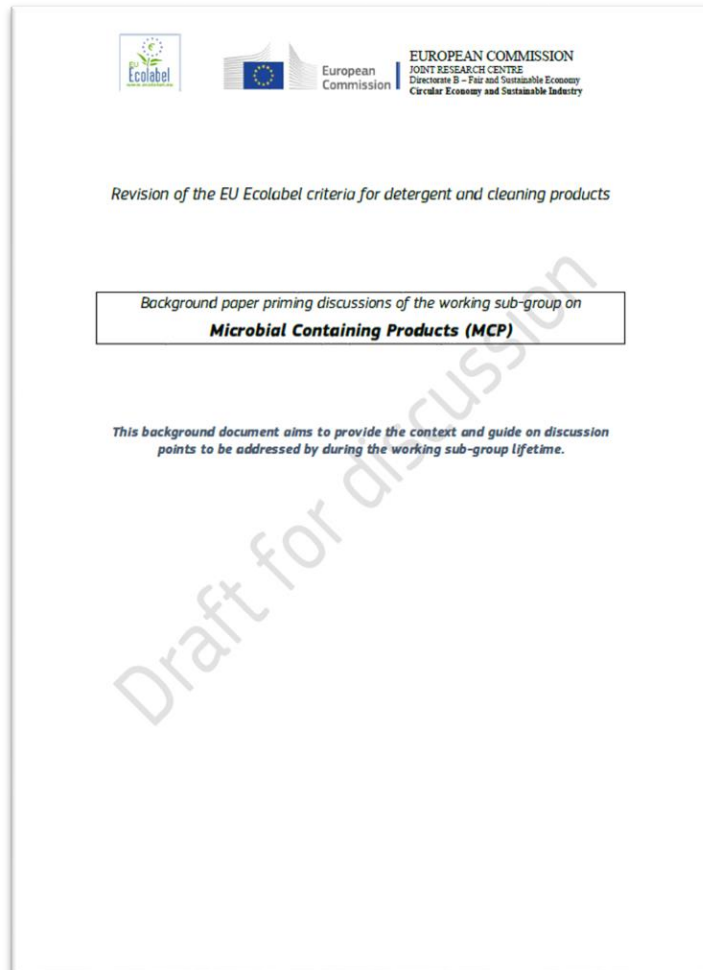
Criterion	Sub-criterion
Excluded and restricted substances	Specified excluded and restricted substances
	Hazardous substances
	Substances of very high concern (SVHCs)
	Fragrances
	Preservatives
	Colouring agents
	Enzymes
	Corrosive properties (Only for HDD)
Packaging	Micro-organisms (Only for HSC)
	Weight/Utility ration (WUR)

**Aim** – Achieving safe and performing MCP that enable environmental gains via improved/new EU Ecolabel criteria

[1] 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)  
[2] [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)  
[3] [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)  
[4] [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)  
[5] [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)  
[6] [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)  
[7] [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. MCP sub-AHWG documents

## MCP background discussion



Proposed sub-criterion (h) micro-organisms	
HSC LD	<p>(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).</p> <p>(ii) Safety:</p> <ul style="list-style-type: none"> <li>— All intentionally added micro-organisms shall belong to <del>both of the following</del> Risk Group I as defined by Directive 2000/54/EC of the European Parliament and of the Council ( <sup>179</sup> ) — biological agents at work,</li> <li>— <del>the Qualified Presumption of Safety (QPS) list issued by the European Food Safety Authority (EFSA).</del></li> <li>— 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.</li> </ul> <p>(iii) Absence of contaminants: pathogenic microorganisms, 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:</p> <ul style="list-style-type: none"> <li>— E. coli, test method ISO 16649-3:2005,</li> <li>— Streptococcus (Enterococcus), test method ISO 21528-1:2004,</li> <li>— Staphylococcus aureus, test method ISO 6888-1,</li> <li>— Bacillus cereus, test method ISO 7932:2004 or ISO 21871,</li> <li>— Salmonella, test method ISO 6579:2002 or ISO 19250.</li> </ul> <p>(iv) All intentionally added micro-organisms shall not be genetically modified micro-organisms (GMMs).</p> <p>(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.</p> <p>(vi) Microbial count: products in their in-use form shall have a standard plate count equal to or greater than <math>1 \times 10^6</math> colony-forming units (CFU) per ml in accordance with ISO 4833-1:2014.</p> <p>(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 months in accordance with ISO 4833-1:2014.</p> <p>(viii) Fitness for use: the product shall fulfil all the requirements set out in Criterion 6 on fitness for use and all claims made by the manufacturer on the actions of the micro-organisms contained in the product shall be documented through third-party testing.</p> <p>(ix) Claims: it is prohibited to claim or suggest on the packaging or by any other communication that the product has an antimicrobial or disinfecting effect.</p> <p>(x) User information: the product label shall include the following information:</p> <ul style="list-style-type: none"> <li>— that the product contains micro-organisms,</li> <li>— that the product shall not be used with a spray trigger mechanism,</li> <li>— that the product should not be used on surfaces in contact with food,</li> <li>— an indication of the shelf life of the product.</li> </ul>
HSC	<p>Assessment and verification: the applicant shall provide:</p> <p>(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.</p> <p>(ii) Documentation demonstrating that all micro-organisms belong to Risk Group I <del>and the QPS list</del> 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.</p> <p>(iii) Test documentation demonstrating that the pathogenic micro-organisms are not present in the product.</p> <p>(iv) Documentation demonstrating that all micro-organisms are not GMMs.</p> <p>(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.</p> <p>(vi) Test documentation of CFU per ml of in-use solution (for undiluted products, the dilution ratio recommended for "normal" cleaning shall be used).</p> <p>(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.</p> <p>(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.</p> <p>(ix) and (x) Artwork of the packaging or a copy of the product's label.</p>

## 1<sup>st</sup> Draft criteria (Technical report 1 [TR1])





# 1. First draft criteria (TR1)

Proposed sub-criterion (h) micro-organisms	
1	<p>(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).</p> <p>(ii) Safety:</p> <p>— All intentionally added micro-organisms shall belong to <del>both of the following</del> Risk Group I as defined by Directive 2000/54/EC of the European Parliament and of the Council ( <sup>179</sup> ) — biological agents at work,</p> <p>— <del>the Qualified Presumption of Safety (QPS) list issued by the European Food Safety Authority (EFSA).</del></p> <p>— 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.</p> <p>(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:</p> <p>— E. coli, test method ISO 16649-3:2005,</p> <p>— Streptococcus (Enterococcus), test method ISO 21528-1:2004,</p> <p>— Staphylococcus aureus, test method ISO 6888-1,</p> <p>— Bacillus cereus, test method ISO 7932:2004 or ISO 21871,</p> <p>— Salmonella, test method ISO 6579:2002 or ISO 19250.</p> <p>(iv) All intentionally added micro-organisms shall not be genetically modified micro-organisms (GMMs).</p> <p>(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.</p> <p>(vi) Microbial count: products in their in-use form shall have a standard plate count equal to or greater than <math>1 \times 10^5</math> colony-forming units (CFU) per ml in accordance with ISO 4833-1:2014.</p> <p>(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 months in accordance with ISO 4833-1:2014.</p> <p>(viii) Fitness for use: the product shall fulfil all the requirements set out in Criterion 6 on fitness for use and all claims made by the manufacturer on the actions of the micro-organisms contained in the product shall be documented through third-party testing.</p> <p>(ix) Claims: it is prohibited to claim or suggest on the packaging or by any other communication that the product has an antimicrobial or disinfecting effect.</p> <p>(x) User information: the product label shall include the following information:</p> <p>— that the product contains micro-organisms,</p> <p>— that the product shall not be used with a spray trigger mechanism,</p> <p>— that the product should not be used on surfaces in contact with food,</p> <p>— an indication of the shelf life of the product.</p>
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4	<p>Assessment and verification: the applicant shall provide:</p> <p>(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.</p> <p>(ii) Documentation demonstrating that all micro-organisms belong to Risk Group I <del>and the QPS list</del> 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.</p> <p>(iii) Test documentation demonstrating that the pathogenic micro-organisms are not present in the product.</p> <p>(iv) Documentation demonstrating that all micro-organisms are not GMMs.</p> <p>(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.</p> <p>(vi) Test documentation of CFU per ml of in-use solution (for undiluted products, the dilution ratio recommended for 'normal' cleaning shall be used).</p> <p>(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.</p> <p>(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.</p> <p>(ix) and (x) Artwork of the packaging or a copy of the product's label.</p>

- 1 - Scope -> LD proposed for inclusion.
- 2 - QPS list -> requirement substituted by performing a microbial risk assessment (RA)
- 3 - Thresholds -> clarification on units (LOG – scale)
- 4 - A&V -> Microbial RA documentation + third-party certification

- **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  $1 \times 10^5$  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?

# 1. MCP background document

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

## 5 Performance

### 5.1 Mapping of aspects

Note that some of the more general aspects highlighted in the previous section/s could be of application here but are not repeated here for brevity.

- Applicable to all PGs, ensure that equal performance is achieved in MCP as in their purely chemical counterparts whilst showing environmental benefits. If special instructions are required, consider adding these via information to the user.

### 5.2 Potential actions

- Gathering further evidences specifically about MCP performance (e.g. mechanisms to exert cleaning/washing functions; testing methods) and MCP formulation profiles (ideally in comparison with chemical counterparts of same product category/format).
- Discussing if, how and to which extent is possible to compare MCP performance against their purely chemical counterparts with methods/protocols specified in existing EU Ecolabel, inclusive of consideration of which (if any) addition is required in this regard.

### 5.3 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.

**Q21 – Could you share details about formulations of MCP?** Please, provide as many formulations in as many product formats as possible, ideally using the format of the EU ecolabel applicant sheet <sup>(14)</sup>. Shall you have any concern about this sharing (e.g. confidentiality), please get in contact with JRC at [JRC-BS-DETERGENTS@ec.europa.eu](mailto:JRC-BS-DETERGENTS@ec.europa.eu).

MCP is an underrepresented group. In terms of formulations that JRC has had access to, thus it strongly encourages stakeholders to share as much information/data as possible in order to properly understand the key differential traits with their chemical counterparts and ensure an accurate representation in forthcoming version of the revised EU Ecolabel criteria.

**Q22 – Could you share details about the specific mechanisms of washing/cleaning of MCP?** Please, provide as many specific references as possible (i.e. scientific articles; industry reports), especially in products groups that you consider should be considered for scope inclusion (e.g. LD, HDD).

Currently, there is information available for HSC but references to other PG are scarce and, up to some point, not fully conclusive. For example, there is information about patents for MCP within the LD PG, plus there is general information on the mode of action, but not conclusive information about how a LD MCP would act (in technical level) is available. Consequently, JRC aims with this question to fill particular gaps on key knowledge necessary to understand technical aspects related to performance, but also to (secondarily) scope expansion.

## Section

by which discussion is structured in the document, namely: Existing criteria (HSC); Scope expansion (LD) & performance

## Mapping of aspects

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

## Potential actions

which could lead to improved *Micro-organisms sub-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. MCP background document

**Q1 (ii)** – Which should be the scope of a potential MCP RA? What are the core elements you foresee in a MCP RA? Please, while responding consider that the question refers to all PGs under the EU Ecolabel criteria scope. If you consider that is more appropriate to provide your response applicable to a particular PG (or set of them), please do so and specify why.

The scope defines the content and structure of any RA. With this question the JRC intend to identify which are the core elements that are essential in any MCP RA. Ideally, these should be applicable to any PG within the EU Ecolabel criteria scope in order to simplify and streamline the process of setting provisions and their verification means. Note that this information is very relevant and linked to which could be the standardised risk schemes/guidance and/or part of these, since it conditions considering them as relevant or not, thus being entitled for consideration and/or uptake as part of EU Ecolabel provision for MCP (See Q2, Q3 & Q4 rationales). Examples of questions that could prime discussion in this regard are: (relative to hypothetical MCP RA) *are environmental impacts included alongside human health? Does it cover any “type” of microorganism covered?*

**Q15** – Do you have any further remark applicable/ resource relevant to existing criteria on MCP (not restricted only to HSC)? Please, be as specific as possible in your response.

## Question unique number + sub-criteria specification

(II) Safety:

- ~~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.

## Short rationale accompanying some questions

Open question at end of each section

# 1. MCP sub-AHWG - summary

## ***MCP sub-AHWG overview***

Aim/s: improving provisions in existing detergent and cleaning products EU Ecolabel criteria (HSC products) and/or develop new ones (e.g. scope expansion - LD) having as primary focus safety (hazard/risks identification) but also technical performance at EU level.

Scope: *Criteria Scope, Excluded & Restricted substances (microorganisms), Fitness for use*; All PGs but focus on HSC and LD.

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 (microbial) safety assessments and/or experts on this type of products/formulation (e.g. industry – license holders / manufacturers) and/or academics with expertise in this field are especially welcomed here.

Sub-AHWG composition: The total number of sub-AHWG members registered was 21 (as 31/05/24), with industry accounting for the greatest share (15/21), followed by *Other* entities (e.g. testing laboratories; consultancies), Competent / ecolabelling bodies (5/21) and lastly, NGOs (1/21).

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

## 2. Questions – Existing criteria (HSC)

### (ii) Safety:

- ~~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.~~

**Q1 (ii) – Which should be the scope of a potential MCP RA? What are the core elements you foresee in a MCP RA? Please, while responding consider that the question refers to all PGs under the EU Ecolabel criteria scope. If you consider that is more appropriate to provide your response applicable to a particular PG (or set of them), please do so and specify why.**

**Q2 (ii) – Could you share any reference to standardised risk schemes and/or guidance/s relevant to performing MCP RA holistically? Please, note that this implies that all relevant aspects of the pursued MCP RA are considered within the scope of the guidance.**

**Q3 (ii) – You share which could be a suitable selection of sections/aspects from (ideally standardised) risk schemes and/or guidance/s relevant to performing MCP RA? Please, note that this implies all relevant horizontal aspects (e.g. Hazard identification; Exposure assessment) that can be applicable even if the scope of the guidance does not fully match intended for MCP RA.**

**Q4 (ii) – Could you share which could be a suitable selection of key/core aspects from (ideally standardised) risk schemes and/or guidance/s relevant to performing MCP RA? Please, note that this implies specific key/core aspects (e.g. Microorganism identification/characterisation) relevant to MCP RA that should/must be included to ensure achieving the aim/s intended in the MCP RA)**

**Q5 (ii) – Under the assumption that a MCP RA is required, should microorganisms presenting EFSA QPS status (namely, be in QPS list) be exempted from performing the whole/certain parts of such MCP RA? Please, provide a reasoned answer why you consider it should be wholly exempted from a MCP RA. Alternatively, quote which parts could be exempted and which complementary parts would require assessment**

**Q6 (ii) – Should the independent third-party verification of the MCP RA be maintained? If so, which should be the criteria defining such independent third party. Please, provide a reasoned answer**

Define key aspects to consider / technical guidance to follow

e.g. Reduced microbial RA for QPS list microorganisms in food contact surfaces?

Verification implications (e.g. resources)

## 2. Questions – Existing criteria (HSC)

(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.

**Q7 (iii) – Do you have any suggestion on any microorganism that should be considered for inclusion in the *absence of contaminants* list? Complementary, do you have any suggestion about a legislation and/or scheme to which EU Ecolabel criteria should consider alignment with? If so, should there be a specific quotation within the legal criteria text? Please, provide as specific and comprehensive answer as you can, including reasons why.**

Refer explicitly to legislation (e.g. revised Detergent Regulation) or to any other relevant source/instrument?

## 2. Questions – Existing criteria (HSC)

(vi) Microbial count: products in their in-use form shall have a standard plate count equal to or greater than  $1 \times 10^5$  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 months in accordance with ISO 4833-1:2014.

**Q8 (vi) – Would you support substituting ISO 4833-1:2014 by ISO 21149:2017? Under your view, which are the potential trade-offs (if any)? Please, provide as specific and comprehensive answer as you can, including reasons why.**

**Q9 (vi) – Would you support keeping the existing legal text (“Microbial counts: products in their in-use form shall have a standard plate count equal to or greater than  $1 \times 10^5$  colony-forming units (CFU) per ml in accordance with ISO 4833-1:2014”)? Alternatively, which change would you suggest? Please, if not supporting existing legal text, formulate your response as detailed as possible, ideally reasoning your proposal (why such elements should be included).**

**Q10 (vii) – Would you support removing the restriction on not exceeding more than 10% variation yearly? If not, would you support alternative wording (e.g. variation expressed as X LOG). Please, if supporting keeping this requirement, provide as many details as possible, ideally a wording proposal**

**Q11 (vii) – Would you support reducing the minimum shelf-life (currently 24 month?)? If so, could you state which could be a meaningful and sensible minimum shelf-life? If you do not support having a minimum pre-set value for mandatory shelf-life, could you please propose alternative provisions? Please, be as specific as possible and reason any reply provided. Also note that, in any case, discussion and agreement on verification means of stability/shelf-life should be in place.**

Shelf-life as declaration + performance proof/s (as in (vi))  
OR  
Setting the/a minimum shelf-life



## 2. Questions – Existing criteria (HSC)

(x) User information: the product label shall include the following information:

- that the product contains micro-organisms,
- that the product shall not be used with a spray trigger mechanism,
- that the product should not be used on surfaces in contact with food,
- an indication of the shelf life of the product.

**Q12 - In (x) User information** is required that the label states “*that the product should not be used on surfaces in contact with food*”. Would you support modifying this provision to allow (in any or specific cases) to use MCP in food contact surfaces? If so, could you provide references and/or reasoned arguments about why and how?

**Q13 (vii) – In (x) User information** is required that the label states “*that the product shall not be used with a spray trigger mechanism*”. Would you support modifying this provision to allow (in any or specific cases) to use MCP in spray format? If so, could you provide references and/or reasoned arguments about why and how?

*Please, be as specific as possible and reason any reply provided. Also note that, in any case, discussion and agreement on verification means of any case/circumstance quoted should also be considered. Finally, provide as many relevant references as feasible.*

**Q14 (A&V) – If not already addressed in any of the previous questions, which are the factors/aspects impeding an effective *Assessment & verification* with regard to MCP?** *Please, be as specific as possible in your response.*

**Q15 – Do you have any further remark applicable/ resource relevant to existing criteria on MCP (not restricted only to HSC)?** *Please, be as specific as possible in your response.*

e.g. Assuming microbial RA in place + QPS list?

e.g. Assuming microbial RA in place + technical provisions?

e.g. Idem + not specific end users (i.e. household)?

## 2. Questions – Scope expansion (LD)

*What is applicable, what not and how to complement it?*

**Q16 – Would you support extending the scope of MCP to other PG? Alternatively or complementary, would you allow non-professional end-users to use them? Please, be as specific and comprehensive in your answer/s as you can, including reasons why.**

**Q17 (iii) – Complementary to Q7, Do you have any suggestion on any microorganism that should be considered for inclusion in the *absence of contaminants* list specific to the nature/usage of other PGs than HSC? Please, consider Q7 rational and be as specific and comprehensive in you answer/s as you can, including reasons why.**

**Q18 (A&V) – If not already addressed in any of the previous questions, which are the factors/aspects impeding an effective *Assessment & verification* with regard to MCP? Complementary, which are the A&V elements you missing for alternative products groups to HSC (e.g. LD, HDD)? Please, be as specific as possible in your response.**

**Q19– Do you consider that existing EU Ecolabel *Fitness for use* 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.**

**Q20– Do you have any further remark applicable/ resource relevant to MCP supporting scope expansion to other PGS / context of use? Please, be as specific as possible in your response.**

## 2. Questions – Performance

Technical information on formulation & mode of action missing (LD)

**Q21 – Could you share details about formulations of MCP?** *Please, provide as many formulations in as many product formats as possible, ideally using the format of the EU ecolabel applicant sheet <sup>(18)</sup>. Shall you have any concern about this sharing (e.g. confidentiality), please get in contact with JRC at [JRC-B5-DETERGENTS@ec.europa.eu](mailto:JRC-B5-DETERGENTS@ec.europa.eu)*

**Q22 – Could you share details about the specific mechanisms of washing/cleaning of MCP?** *Please, provide as many specific references as possible (i.e. scientific articles; industry reports), especially in products groups that you consider should be considered for scope inclusion (e.g. LD, HDD).*

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

- Feedback to questions (Q1 –Q24) via EU survey. Deadline for feedback is 16/07/24.
- The 2<sup>nd</sup> sub-AHWG is scheduled for 01/10/24 (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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