

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

16 July 2024

WEBEX SESSION

ETIQUETTE FOR VIRTUAL MEETING PARTICIPANTS

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

Packaging [pack] Ad Hoc Working Sub-Group (sub-AHWG)

1st sub-AHWG Meeting; 16th July 2024; Virtual (webex)

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The Joint Research Centre (JRC)

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

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- 1. Introduction – Sub-AHWG overview.**
- 2. Pack 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]

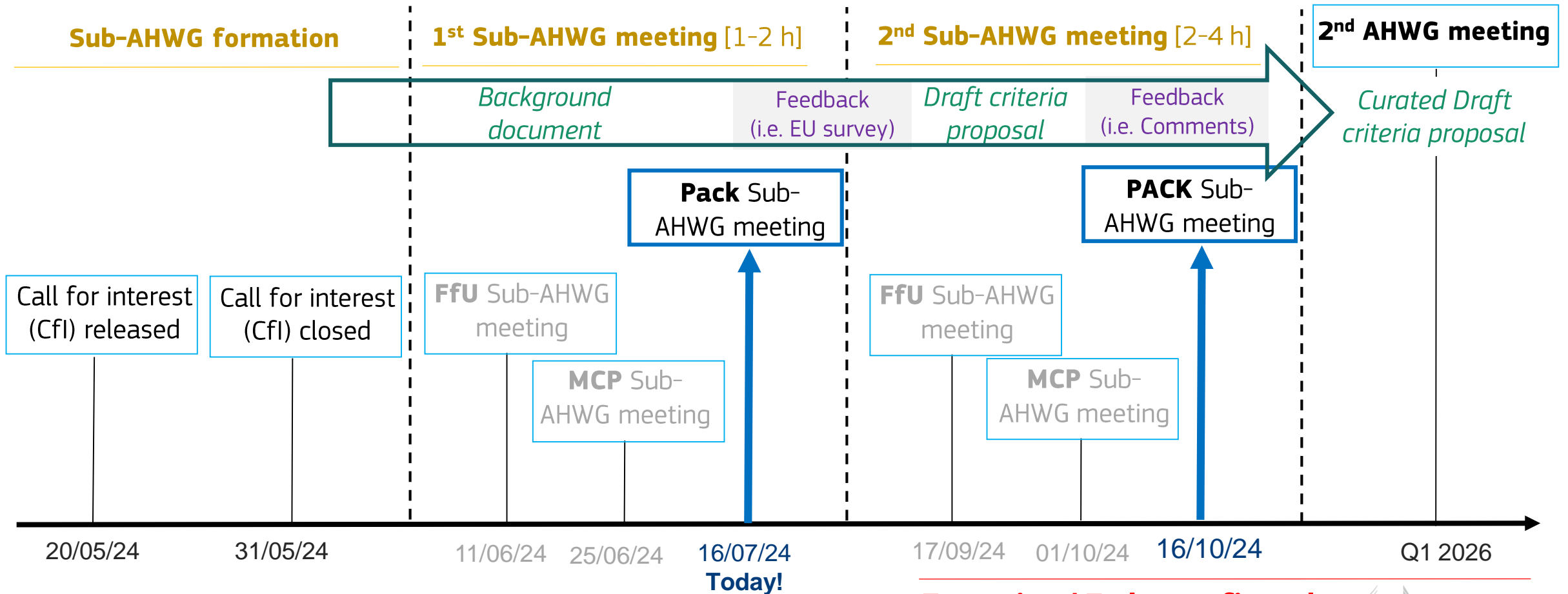


- [Industrial and institutional laundry detergents](#) (IILD)

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



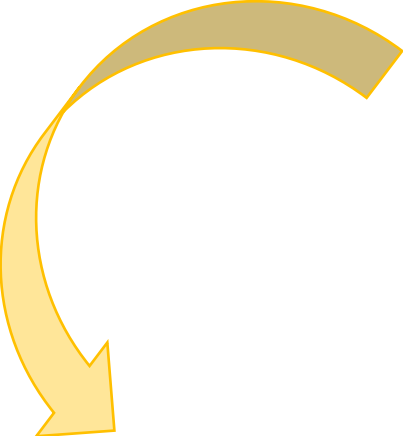
Tentative / To be confirmed

1. *Packaging* criterion


The aim of this criterion is to reduce the environmental impact of packaging encouraging the use of materials that are recyclable and reusable, and promoting recycling and recovery practices to minimize packaging waste

Sub-criteria

1. Recycled materials content (for LD, DD, HDD, HSC)
2. Weight/utility ratio (WUR)
3. Design for recycling
4. Products sold in spray bottles (Only for HSC)
5. Packaging take-back systems (Only for HSC, IIDD, IILD)



It sets specific targets for recycled content in paper/cardboard and plastic packaging



It ensures packaging is created in a way that facilitates an efficient recyclability

1. Pack sub-AHWG documents

Pack background discussion

Revision of the EU Ecolabel criteria for detergent and cleaning products

Background paper priming discussions of the working sub-group on **Packaging (Pack)**

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

1st Draft criteria (Technical report 1 [TR1])

JRC SCIENCE FOR POLICY REPORT

Revision of EU Ecolabel criteria for detergent products

Technical report v. 1. 0

Lag-Brotaris, A.J., La Plack, M.G., Wolf, O. – JRC
Doratello, S. - Viegand Maage

2024

NEW sub-criterion (x) recycled materials content

The criterion sets requirements for sales packaging (primary packaging) and grouped packaging (secondary packaging).

a) Paper/cardboard used for packaging

Sales packaging (primary packaging) made of paper and/or cardboard shall contain a minimum 80 % of recycled material.

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.

b) Plastic used for packaging

	Packaging element	Excluded materials and components (*)
LD	Body/Material	<ul style="list-style-type: none"> — Dyed black, using soot-carbon-based pigments — Pouch/bag laminates with layer of different materials (composite packaging)
DD		
HDD	Label or sleeve	<ul style="list-style-type: none"> — 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/cm³ 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
HSC		

1. Packaging background document



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3 Sub-criterion - Recycled materials content

3.1 Mapping of aspects

Scope (professional HSC): The scope of the proposed EU Ecolabel criteria for recycled content in packaging includes product groups such as Laundry Detergent (LD), Dishwashing Detergent (DD), Hand Dishwashing Detergent (HDD), and Hard Surface Cleaning (HSC) products. However, it excludes Industrial and Institutional Laundry Detergent (IILD) and Industrial and Institutional Dishwashing Detergent (IIDDD) from its requirements. Considering that HSC products encompass both professional and household applications, concerns have emerged regarding the distinct requirements applied to the professional segment of HSC products compared to those for IILD and IIDDD. These concerns focus on the difficulties in achieving the minimum Post-Consumer Recycled (PCR) content in the packaging of professional products, where it seems that the reliance on virgin plastics is frequently justified by stringent safety.

3.2 Potential actions

About the **Scope (HSC professional):** The approaches that can be proposed and/or discussed are:

- Consider the exclusion of the recycled material content requirement specifically for professional HSC products, similar to the current exclusion of IILD and IIDDD
- Gather evidences about safety concerns regarding the use of recycled materials versus virgin plastics in professional HSC product packaging and assess feasibility of implementing specific provisions.
- Explore the potential for adjusting the PCR content requirements for professional HSC products based on the findings of the safety assessments (see previous bullet point).

3.3 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.

Q1 - Would you support the exclusion of Hard Surface Cleaning (HSC) products for professional use from the scope of the 'Recycled materials content' criterion? Please, provide detailed data and a reasoned explanation to support your position, focusing on safety concerns or other relevant factors that justify your favourable or unfavourable view

Section

by which discussion is structured in the document, namely: Recycled material content; Design for Recycling

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 *Packaging* sub-criteria 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).

Open question at end of each section

Question unique number

Q13 - Do you have any further applicable observations/resources relevant to the recycled materials content sub-criterion? Please, be as specific as possible in your response.

1. Packaging sub-AHWG - summary

Pack sub-AHWG overview

Aim/s: improve existing and new proposed criteria related to packaging of detergent and cleaning products (e.g. Design-for-Recycling criterion and Recycled Materials Content criterion) to balance environmental goals with recycling efficiency, innovation adaptability, and compliance feasibility.

Scope: *Criteria Packaging*, particularly sub-criteria *Recycled Materials Content*, *Design-for-Recycling*; All PGs.

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

Target audience: stakeholders with experience designing packaging and recycled material (e.g. industry – license holder, recycling associations), inclusive of functional traits (e.g. adhesives for labels), as well as the supply –chain involved (e.g. suppliers, recyclers) are especially welcomed here.

Sub-AHWG composition: The total number of sub-AHWG members registered was 30, with industry accounting for the greatest share (18/30), followed by *Other* entities (e.g. testing laboratories; consultancies) (4/30), Competent / ecolabelling bodies (5/30) and NGOs (3/30).

2. Packaging sub-AHWG – questions / discussion.

2. Recycled material content - Questions

NEW sub-criterion (x) recycled materials content

The criterion sets requirements for sales packaging (primary packaging) and grouped packaging (secondary packaging).

a) Paper/cardboard used for packaging

Sales packaging (primary packaging) made of paper and/or cardboard shall contain a minimum 80 % of recycled material.

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.

b) Plastic used for packaging

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 doses) and pouches are exempt from this requirement.

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).

LD

DD

HDD

HSC

Potential exclusion of professional HSC

Q1 - Would you support the exclusion of Hard Surface Cleaning (HSC) products for professional use from the scope of the 'Recycled materials content' criterion? Please, provide detailed data and a reasoned explanation to support your position, focusing on safety concerns or other relevant factors that justify your favourable or unfavourable view

Gather evidences about safety concerns regarding the use of recycled materials versus virgin plastics in professional HSC product packaging.

2. Recycled material content - Questions

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All closures and trigger closures (e.g. removable closures and pump doses) and pouches are exempt from this requirement.

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).

Scope clarification

Modification of the proposed criterion text

Plastic used for packaging

Sales packaging (bottles, canisters) 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.

~~Recycled content and recyclability of sales packaging (primary packaging) and grouped packaging (secondary packaging) shall be indicated on the sales packaging.~~ If the recycled content is stated on the packaging this shall refer to the total packaging weight (body, closure, label/sleeve and trigger closure).

Q2 - Do you find that the proposed modifications to the 'Recycled Material Content' criterion clarify the requirements for recycled content in plastic packaging? Do you support these modifications? Please provide as specific and comprehensive an answer as possible, including the reasons why.

Q4 - Would you support expanding the recycled content requirements to include all plastic packaging components in the primary (sales) packaging, beyond only bottles and canisters? Please provide as specific and comprehensive an answer as possible, including the reasons why.

LD

DD

HDD

HSC

2. Recycled material content - Questions

NEW sub-criterion (x) recycled materials content

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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.

b) Plastic used for packaging

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 doses) and pouches are exempt from this requirement.

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).

Ambition level of the requirements

For paper/cardboard

Q5 - Would you support increasing the minimum recycled content in paper/cardboard for sales packaging to over 80%, and for grouped packaging to over 70%? Please provide reasoned explanation to support your position

For plastics

Q3 - Acknowledging that that stakeholders raised concerns on the ambition level of the recycled content for plastic packaging, could you share which would be feasible targets (set by plastic type)? JRC would like to receive feedback on percentage over total packaging weight, inclusive of any relevant remark. Please provide as specific and comprehensive an answer as possible

Q6 - Could you provide specific details on the safety risks associated with recycled plastics, specifying the information according to the different types of plastics? Please provide as specific and comprehensive an answer as possible.

Q7 - Some substances/materials have been identified as hindering the recycling process (e.g. fibre loss, presence of additives and/or dyes during the recycling process). In this sense, could share any insights about them? Please provide as specific and comprehensive an answer as possible.

2. Recycled material content - Questions

NEW sub-criterion (x) recycled materials content

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All closures and trigger closures (e.g. removable closures and pump doses) and pouches are exempt from this requirement.

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).

Secondary plastic packaging requirements

Different approaches:

1. Grouped packaging shall be made exclusively of cardboard and/or paper and shall adhere to the recycled content requirements for paper/cardboard secondary packaging. Plastics grouped packaging would not be permitted.
2. Plastic grouped packaging shall be recyclable with a recyclability performance grades of at least 95%. Recyclability shall be verified by complying with the EN 13430 or ISO 18604.
3. Plastic grouped packaging shall comply with the same recycled content requirement as primary (sale) packaging).

Q8 – Relative to grouped packaging and from the three proposed approaches (See section 3.2 Recycled material content), would you support the inclusion of a provision that requires grouped packaging to be composed exclusively of cardboard and/or paper, complying with the recycled content requirements for paper/cardboard secondary packaging, and thus excluding the use of plastic for grouped packaging (option 1)? Please provide as specific and comprehensive an answer as possible, including the reasons why.

Q11 (A&V) – Do you support the verification of plastic grouped packaging recyclability by compliance with EN 13430 or ISO 18604 standards? Please provide your perspective on the suitability of these standards for recyclability assessment and verification.

2. Design for Recycling - Questions

Colours

Packaging element	Excluded materials and components (*1)
Body/Material	<ul style="list-style-type: none">— Dyed black, using soot-carbon-based pigments— Pouches/bag laminates with layer of different materials (composite packaging)

Modification of the proposed criterion text

Excluded materials and components: “All non-NIR detectable pigments such as carbon black”

Q15 – Do you agree with the modification of the criterion text for 'Excluded Materials and Components' to specify the exclusion of 'All non-NIR detectable pigments such as carbon black' instead of the current proposal which excludes 'Dyed black, using soot-carbon-based pigments'? Please provide as specific and comprehensive an answer as possible, including the reasons why.

Q16 – Would you support the exclusion of materials that, despite being NIR-detectable or have additional characteristics like fluorescence could negatively affect the recycling process? Please provide as specific and comprehensive an answer as possible, including the reasons why.

2. Design for Recycling - Questions

Inks

Text proposal for new inks requirements

Excluded materials and components: “[Non-toxic and non-bleeding inks according to EuPIA guideline](#)”

Q17 – Would you support the introduction of a new requirement that limits the use of inks that can impact the recycling process? Do you agree with the proposed wording for excluded materials/components in the Design for Recycling criterion: 'Non-toxic and non-bleeding inks according to EuPIA guidelines'? Please provide as specific and comprehensive a response as possible, indicating also if any additional considerations related to inks should be taken into account.

2. Design for Recycling - Questions

Barrier coating, EVOH

Packaging element	Excluded materials and components (*1)
Barrier coatings	Polyamide, functional polyolefin, EVOH provided with tie layers made by a polymer different than the one used for the packaging body, metallised and light blocking barriers

Q18 – Regarding the proposed requirement for EVOH barrier coatings and its impact on recyclability, could you specify any aspects of the current wording that may be unclear or lead to uncertainties? Please provide as specific and comprehensive an answer as possible, including the reasons why.

Q19 – Do you believe that the requirement for EVOH barrier coatings should be amended to account for different types of plastics, reflecting their recyclability guidelines? Please provide as many details as possible, ideally a wording proposal that align with widely recognized industry recyclability guidelines.

2. Design for Recycling - Questions

Laminated packaging

Packaging element	Excluded materials and components (*1)
Body/Material	<ul style="list-style-type: none">— Dyed black, using soot-carbon-based pigments— Pouches/bag laminates with layer of different materials (composite packaging)

Limitations for monomaterial pouches > 1L

Q20 – Given the challenges of recycling multi-material multilayer films and acknowledging that monomaterial multilayer films may face limitations in terms of robustness and issues with welding and closure, could you share any developments or successful implementations that have enhanced their structural stability and sealing reliability for use in large-sized packaging? *Please, provide as many details as possible, including any specific research findings, or technical data that could contribute to understanding the current landscape and potential solutions for these challenges.*

Q21 – Would you agree to extend the requirement for the exclusion of laminates with layers of different materials to packaging types other than pouches/bags? *Please provide as specific and comprehensive an answer as possible, including the reasons why.*

2. Design for Recycling - Questions

Pressure Sensitive Labels (PSL) and Adhesives

EU Ecolabel Detergents: PSL requirements are **not** included

EU Ecolabel Cosmetics: Exclusion of PSL unless the adhesive is water-releasable under recycling wash conditions

Concerns:

- Requirements may conflict with the CLP regulations that mandate labels be firmly attached to packaging.
- Concerns about the availability of PSLs that comply with the washing conditions of the recycling process, specifically those demonstrating water releasable adhesive properties based on washing quick test procedure (cold temperature washing step) of the Recyclclass protocol.

Advancements in label and adhesive technologies

PSL with standard acrylic adhesives can completely release after undergoing the full recycling process, including the critical step of mechanical friction that facilitates label release

Revise the wording to reflect the entire recycling process, not just the washing conditions (cold wash) as currently stated in the EU Ecolabel criteria for cosmetics.

2. Design for Recycling - Questions

Pressure Sensitive Labels (PSL) and Adhesives

Text proposal for new potential PSL requirements

Excluded materials and components for HDPE packaging: “Pressure sensitive labels in PP, PE or PO material (with density $<1\text{g/cm}^3$) unless the adhesive is releasable in the recycling process for HDPE packaging”

Excluded materials and components for PET packaging: “Pressure sensitive labels in PP, PE or PO material (with density $<1\text{g/cm}^3$) unless the adhesive is releasable in alkali water at 60-80 C for PET packaging”

Q23 – Would you support the inclusion of specific requirements for pressure-sensitive labels (PSLs) and adhesives in light of the recent technological advancements in label materials (PO, PP, PE) and adhesives for HDPE packaging? *Please provide as specific and comprehensive an answer as possible, including the reasons why.*

Q24 - If you agree with the inclusion of specific requirements for pressure-sensitive labels (PSLs) and adhesives, would you support the proposed text for the requirements regarding excluded materials and components for different packaging as follow: 1) For HDPE packaging: 'Pressure-sensitive labels in PP, PE, or PO material (with density $<1\text{ g/cm}^3$) unless the adhesive is releasable in the recycling process.' 2). For PET packaging: 'Pressure-sensitive labels in PP, PE, or PO material (with density $<1\text{ g/cm}^3$) unless the adhesive is releasable in alkali water at 60-80°C.'? *Please provide as specific and comprehensive an answer as possible, including the reasons why.*

2. Design for Recycling - Questions

Packaging element	Excluded materials and components (*1)
Label or sleeve	<ul style="list-style-type: none"> — 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/cm³ 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

Q22– Would you support modifying the newly proposed requirement of excluded materials/components regarding adhesive for PET packaging to align with the wording of Recyclclass guideline i.e “Alkali/water soluble adhesive; Alkali/water non-soluble or non-releasable adhesive at 60-80°C for PET bottle”? Please provide as specific and comprehensive an answer as possible, including the reasons why.

Modification of the proposed criterion text

“Alkali/water soluble adhesive; Alkali/water non-soluble or non-releasable adhesive at 60-80°C for PET bottle”

2. Next steps – Feedback & 2nd Meeting

- **Feedback** to questions via **EU survey**. **Deadline** for feedback is **09/08/24**.
- The **2nd sub-AHWG** is scheduled for **05/10/24 (tbc)**
- Previous **details** to be send **via email** after this 1st sub-AHWG meeting (inclusive EU survey link).
- Prior to the **2nd sub-AHWG**, a **draft criteria proposal** considering 1st 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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Slide/s 5: Detergent and cleaning products icons, source: e.g. Freepik - Flaticon.com (attribution surang)

Slide 5: Safety Helmet, source: e.g. "[Designed by rocketpixel / Freepik](#)"