



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

Revision of the EU Ecolabel criteria for detergent and cleaning products

*Minutes of the meetings (1st and 2nd) of the working sub-group (sub-AHWG) on
Fitness for Use (FfU)*

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1 Introduction

The Joint Research Centre (JRC) organised Ad Hoc working sub-groups (sub-AHWG) as part of the revision of EU Ecolabel criteria, aimed at feeding, cross-checking and improving draft criteria proposals made on specific aspects. The scope could be as wide as a criterion *and/or* a number of product groups but also really specific, as examining a particular material/ingredient type within a product sub-group. Whatever the case, it requires the involvement of experts on the chosen topic due to the highly technical nature *and/or* specificity of the exchanges expected during the sub-AHWGs meeting/s. The product groups (PGs) under the scope of the EU Ecolabel criteria under revision are:

- "[Dishwasher detergents](#)" DD
- "[Industrial and institutional automatic dishwasher detergents](#)". IID
- "[Laundry detergents](#)" LD
- "[Industrial and institutional laundry detergents](#)" IILD
- "[Hard surface cleaning products](#)" HSC
- "[Hand dishwashing detergents](#)". HSC

These PGs are treated horizontally, meaning that there won't be a separated sub-AHWG for each particular product group but rather all discussions on a particular topic for the six PGs will be happening together on the same day.

The sub-AHWGs steps for the revision of the EU Ecolabel criteria for detergent and cleaning products were:

1. Sub-AHWG formation -> JRC released a Call for Expression of Interest (CfI) during May 2025 and then stakeholders confirmed their willingness to participate. After the CfI deadline, the JRC notified relevant parties about their membership in the sub-AHWGs and provided the necessary information for the upcoming meeting/s (i.e. background paper).
2. First (1st) sub-AHWG meeting -> In this 1st sub-AHWG meeting the JRC introduced the topic and clarified any doubt surrounding the background information provided beforehand, inclusive of any questions that may have been shared. The aim was to ensure effective understanding and gathering of relevant/missing data/information. Participants shared their comments *and/or* replies to these questions prior to the deadline set by JRC (e.g. via *EU survey platform*; using JRC's template). These substantiated/contributed to a new criteria draft proposal which was discussed in the 2nd sub-AHWG meeting. For this initial meeting the duration estimated was 1-2 hours, being modified according to expected participants/topics to be covered.
3. Second (2nd) sub-AHWG meeting -> In this 2nd sub-AHWG meeting the JRC presented a draft criteria proposal informed by/based on the feedback received in the 1st sub-AHWG meeting. This proposal was circulated prior to the 2nd AHWG meeting, highlighting changes made and specific new discussion points/questions. The aim was to gather specific feedback enabling fine-tuning of this draft criteria proposal. Participants shared their feedback during the meeting, then being reflected in a final version of the background document and used to fine-tune the proposal presented. This curated proposal, inclusive of any further work carried out by the JRC, will be brought for discussion during the 2nd AHWG meeting. For this last meeting, the expected duration was 2-4 hours, being modified depending on expected participants/topics to be covered.

This document provides information about the two (1st and 2nd) meetings held during the lifetime of the technical working sub-group on *Fitness for Use* criterion (FfU sub-AHWG). All necessary details have been included except the feedback received from participants, which for the sake of brevity and coherence has been integrated as part of the background document (final, v3) supporting FfU sub-AHWG activities. All documents (minutes + background document + presentations) have been made publicly available (within the folder *2023 revision documents*) at <https://susproc.jrc.ec.europa.eu/product-bureau/product-groups/411/documents>.

The JRC invites sub-AHWG participants to check the correctness of the minutes elaborated and the feedback provided (integrated in the sub-AHWG background documents). Shall you deem any details as incorrect or inaccurate, please let us know your suggested course of action by contacting us via email at JRC-B5-DETERGENTS@ec.europa.eu. Note that the deadline to provide such comments is the 3rd of April 2025. From this date the JRC will assume the minutes are correct and it will deem them as definitive.



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2 List of organisations involved in the *FfU* sub-AHWG

<i>Organizations expressing interest in participating</i>
PFS Group
European Environmental Bureau
Center For Testmaterials BV
Nopa Nordic A/S
Sasol Italy S.p.A.
Unilever
Diversey
Novozymes (Deutschland GmbH & Denmark)
RAL gGmbH (CB DE)
German Environment Agency, Blue Angel, Germany
Seitz GmbH, Germany
Everdrop GmbH, Germany
EUROTAB OPERATIONS
Reckitt Benckiser
Ecolabeling Denmark
HeiQ Chrisal
NOVAMEX
AMFEP - Association of Manufacturers of Formulators of Enzyme Products
Werner & Mertz GmbH
ABL LABORATOIRE
DR.SCHNELL GmbH & Co. KGaA
CHIMICA HTS
CHRISTEYNS
Chelab sri, Italy
Ecolab GmbH
Probibel BV (brand: yokuu) / Belgium
AFNOR (CB FR)
Persan

3 First (1st) *Fitness for Use (FfU)* sub-AHWG meeting

The meeting was held on the 11/06/24, from 10:00 to 11:30, in virtual format (webex). Prior to it, the JRC shared with stakeholders a compilation of all existing EU Ecolabel performance protocols for all product groups within the scope of the EU Ecolabel detergent criteria, for ease of access to participants. The JRC also shared an initial version of the background document (v1) containing: 1) the mapping of issues/improvable aspects; 2) potential actions and; 3) questions to prime discussions.

There was no fixed agenda given the flexible approach towards this initial meeting, where the general aim pursued by the JRC was to introduce the functioning of the FfU sub-AHWG to then present the background document, aiming to ensure a shared understanding on the information provided and the feedback requested.

The meeting was structured as follow:

1. *Introduction* – The JRC provided a general introduction to the EU Ecolabel criteria under revision and particularly on FfU sub-AHWG related aspects (aims / process / timeline / supporting documents).
2. *FfU sub-AHWG – questions / discussion* – The JRC presented the questions (Q1-Q35) included in the background document (v1) shared prior to the 1st meeting (alongside with a compilation of EU ecolabel performance framework/protocols). The presentation followed the structure in such document, thus by product group, firstly intervening the JRC to subsequently opening the floor to participants for comments.
3. *Next steps + Any other business* - the JRC described next FfU steps (i.e. EU survey completion deadline 02/07/24; 2nd FfU sub-AHWG meeting) and opened the floor for AOB, with no comments raised by participants

Note that all comments shared during this 1st meeting were included in the background document (v2) shared prior to the 2nd meeting, alongside the feedback received via EU survey from participants answering to the questions raised (Q1-Q35). This was integrated and can be consulted in the final version of the background document (v3) within its sub-sections 3 (*Feedback to 1st sub-AHWG meeting*).

4 Second (2nd) *Fitness for Use (FfU)* sub-AHWG meeting

The meeting was held on the 17/09/24, from 09:30 to 12:45 (initially scheduled to end at 12:15), in virtual format (webex). Prior to it, the JRC shared with stakeholders a compilation of all the proposals (changes) made to all existing EU Ecolabel performance protocols. The JRC also shared the 2nd version of the background document (v2) containing: 1) the mapping of issues/improvable aspects; 2) potential actions; 3) feedback to 1st FfU meeting questions; 4) Highlight of proposals made; 5) New set of questions to prime discussions (Q36 – Q70). Note that sub-sections 1) and 2) were identical to the respective sub-sections within the initial version of the background document (v1). The focus of the 2nd FfU sub-AHWG were sub-sections 4) and 5).

The agenda was:

Time	Topic / Block
09:30 – 09:35	Introduction – 2 nd FfU sub-AHWG meeting overview
09:35 – 09:50	All product groups
09:50 – 10:10	Laundry detergent (LD)
10:10 – 10:25	Industrial and institutional laundry detergent (IILD)
10:25 – 10:45	Hard surface cleaning products (HSC)
10:45 – 11:00	<i>Break</i>
11:00 – 11:20	Dishwasher detergent (DD)
11:20 – 11:40	Hand-dishwashing detergent (HDD)
11:40 – 11:55	Industrial and institutional dishwasher detergent (IIDD)
11:55 – 12:15	Next steps + Any other business (AOB)

The aim of this meeting was to highlight the proposals (changes) made in EU Ecolabel performance protocols / frameworks and gather feedback on them, via responses to the new set of questions raised (questions 36-70; Q36 – 70) and/or via any other related comments.

The meeting was structured as follow:

1. *Introduction* – The JRC provided a general introduction to the EU Ecolabel criteria under revision and particularly on FfU sub-AHWG related aspects (aims / process / timeline / updated supporting documents, inclusive of proposals for change).
2. *FfU sub-AHWG – questions / discussion* – The JRC presented the changes proposed in the draft proposal for all EU ecolabel performance framework/protocols. This followed the same structure as in the background document (v2), thus by product group, focusing on highlighting main changes (sub-section 4) and sharing further questions (sub-section 5). The JRC intervened first, presenting the proposals and related questions and then opened the floor for comments. The JRC also flagged a few editing errors in the supporting documents providing, to be amended after the meeting (thus not present in final versions)
3. *Next steps + Any other business* - the JRC described next FfU steps (i.e. curated proposal expected by the 2nd AHWG in Q1 2025) and opened the floor for AOB, with two comments received:
 - a. One participant asked how the efficacy of the generic formulations proposed as reference products for comparative performance testing in JRC’s draft proposal were evaluated. In particular, if they were tested in the laboratory against existing generic formulations (as in EU Ecolabel criteria performance protocols in force) to appraise differences in performance. Also, more broadly, how was the procedure for JRC to come up with a proposal.



- i. The JRC explained that initially several streams are considered (“wider approach”), with information being gathered, structure and organised in order to come up with a range of proposals, from which some are presented to stakeholders. Then, based on stakeholder feedback, the options are further narrowed down, also carrying out research if deemed advisable. However, with regards to laboratory testing of options proposed versus existing, the JRC representative indicated being unaware if such were common practice. If so, then it would only be once options have been widely narrowed down. All the former respond to be more efficient with the resources invested in the EU Ecolabel revision exercise.*
- b. One participant suggested to check consumer behaviour with regards to determining the temperature at which a laundry detergent (LD) used as reference should be effective. It also highlighted that the reference detergent generic formulation used in existing LD performance protocol was conceived to test washing machines (thus the temperature at which is effective, 60C) but not to compare LD performance. Thereby, the new proposal is in “the good way”*
 - i. The JRC acknowledged the comment made.*

Note that all comments shared during this 2nd meeting, focused around Q36 to Q70, were integrated and can be consulted in the final version of the background document (v3) within its sub-sections 5 (*Feedback to 2nd sub-AHWG meeting*).

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5 Next steps

The 2nd Ad Hoc Working Group (AHWG) is scheduled during the 12th (half-day; afternoon) and 13th of March (whole day) 2025 in hybrid attendance mode (Brussels + virtual). During this 2nd AHWG all the draft criteria proposals contained in the 2nd Technical report (TR2) will be discussed and another round of feedback will be opened, for any interested stakeholder to provide comments. This can be done during the meeting but primarily is made in written via the BATIS platform (See <https://eippcb.jrc.ec.europa.eu/batis/>). Relevant supporting documents in preparation for this 2nd AHWG (e.g. TR2) will be published in this website (within the folder *2023 revision documents*): <https://susproc.jrc.ec.europa.eu/product-bureau/product-groups/411/documents>

In this 2nd AHWG there might be new proposals to those discussed during the 2nd sub-AHWG on FfU, resulting from the feedback received by the JRC after this 2nd sub-AHWG plus any additional evidence gathered (e.g. further research). Consequently, for full understanding on the process conducive to the draft criteria proposals on FfU-related aspects contained in the 2nd Technical report (TR2), consider the background document to the sub-AHWG published here (within the folder *2023 revision documents*): <https://susproc.jrc.ec.europa.eu/product-bureau/product-groups/411/documents>

Finally, note that all registered stakeholders receive updates on the progress of the revision of the EU Ecolabel criteria for detergents, informing about milestones reached, when draft documents are released and how to participate/engage in the process (e.g. by providing feedback). If you or any interested party would like to become a stakeholders of this EU Ecolabel criteria revision, then you can do so by registering in the following dedicated website (specify *Detergents* as product group of interest): <https://susproc.jrc.ec.europa.eu/product-bureau/product-groups/411/register>.

In addition, relevant information is posted on BATIS but especially on the dedicated website to this revision project, namely here: <https://susproc.jrc.ec.europa.eu/product-bureau/product-groups/411/home>. You can also contact the JRC team in charge of this revision project at the following email: JRC-B5-DETERGENTS@ec.europa.eu