Revision of the EU Ecolabel criteria for
DETERGENT AND CLEANING PRODUCTS
12-13th March 2025

HYBRID MEETING (Brussels + WEBEX SESSION)

ETIQUETTE FOR VIRTUAL MEETING PARTICIPANTS

- **Please indicate "NAME OF YOUR ORGANIZATION + YOUR FULL NAME"**
- **MUTE YOUR MIC AND SWITCH OFF you CAMERA (unless you have the floor)**
- **USE THE CHAT only to ask for the FLOOR (write "FLOOR" in the chat), and COMMENT only ORALLY**

EU Ecolabel Criteria for Detergents product groups

Laundry Detergents	LD
Industrial & Institutional Laundry detergents	IILD
Dishwasher Detergents	DD
Industrial & Institutional Dishwasher detergents	IIDD
Hand Dishwashing Detergents	HDD
Hard Surface Cleaning Products	HSC

2nd Ad-hoc Working Group Meeting **12th** - 13th March 2025, Hybrid meeting (Brussels + Webex)



The Joint Research Centre (JRC)

Alfonso Jose Lag-Brotons

Maria Grazia La Placa

Paula Perez Lopez

European Commission

1. Opening of virtual room and welcome of participants

Agenda

Day 1: Wednesday 12th March 2025 (Afternoon)

No	Item	SCHEDULE
1.	Opening of virtual room and welcome of participants	14:30 – 14:45
2.	Introduction, political objectives of the EU Ecolabel and process description	14:45 – 14:55
3.	Update of the preliminary background report	14:55 – 15:10
4.	Scope and definitions	15:10 – 15:50
Coffee Break (15 min)		*15:50 - 16:05*
5.	Assessment and verification + Reference dosage + Criterion "Dosage requirements"	16:05 – 16:30
6.	Criterion "Biodegradability"	16:30 – 17:30

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Agenda

Day 2: Thursday 13th March 2025 (Morning)

No	Item	SCHEDULE
1.	Opening of virtual room and welcome of participants	09:00 – 09:15
2.	Criterion “Toxicity to aquatic organisms”	09:15 – 09:45
3.	Criterion “Restricted substances”	09:45 – 11:00
Coffee Break (15 min)		*11:00 – 11:15*
4.	Criterion “Restricted substances”	11:15 – 12:30
5.	Criterion “Sustainable sourcing”	12:30 – 13:00

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Agenda

Day 2: Thursday 13th March 2025 (Afternoon)

No	Item	SCHEDULE
7.	Criterion “Fitness for use”	14:30 – 15:40
8.	Criterion “Packaging”	15:40 – 16:15
Coffee Break (15 min)		*16:15 – 16:30*
9.	Criterion “Packaging”	16:30 – 17:05
10.	Criteria “Automatic dosing systems” + "User information" + "Information on EU Ecolabel"	17:05 – 17:25
11.	Conclusions, next steps and closure of the meeting	17:25 – 17:30

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2. Political objectives of the EU Ecolabel and process description

1. The Joint Research Centre (JRC)

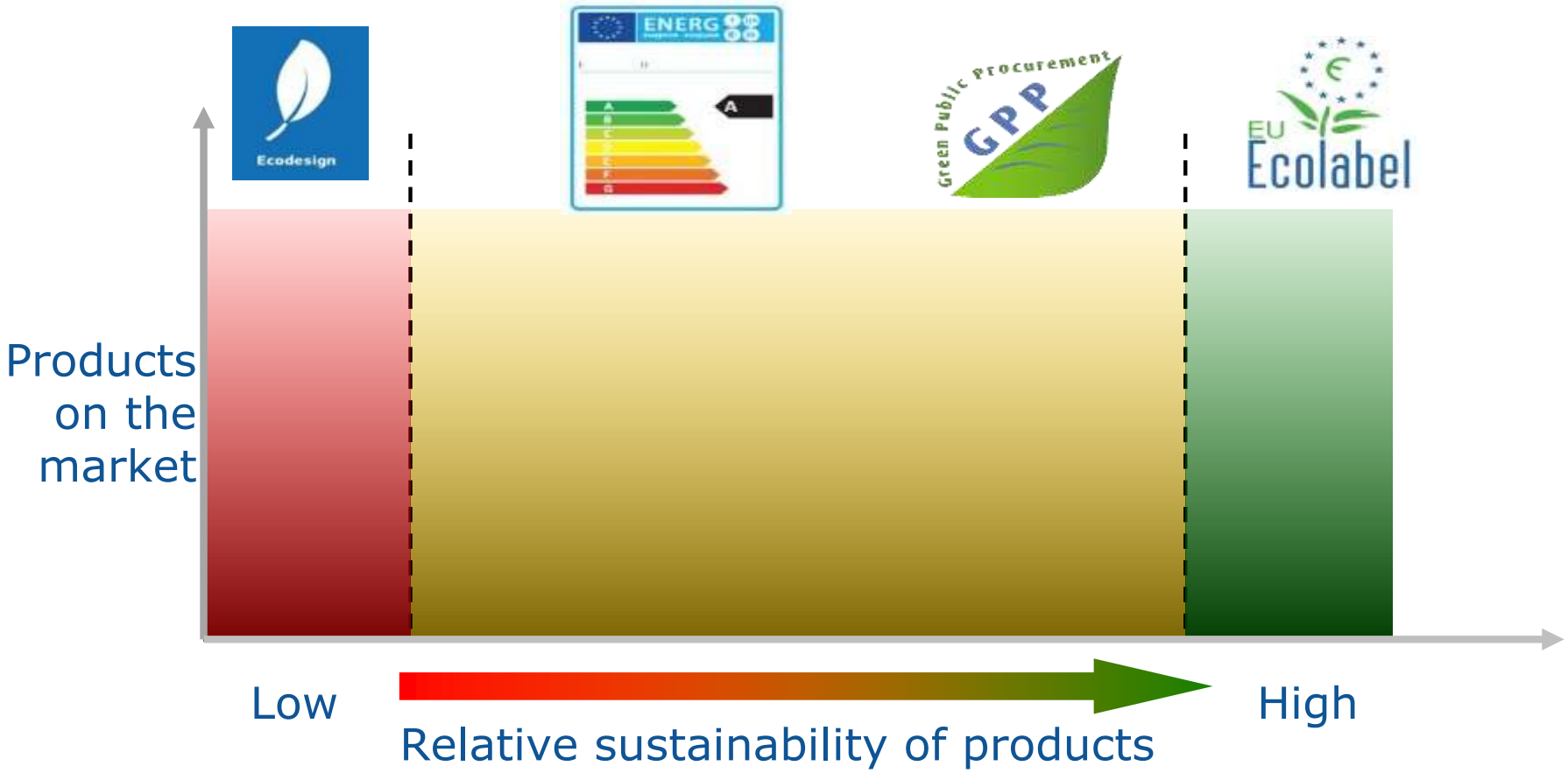
As the science and knowledge service of the European Commission our mission is to support EU policies with independent evidence throughout the whole policy cycle.

1. Circular Economy and Sustainable industry (B5) & sustainable products related policy tools

Cut out least sustainable products

Incentivise choice of higher sustainability products

Encourage development of new, more sustainable products



New instrument

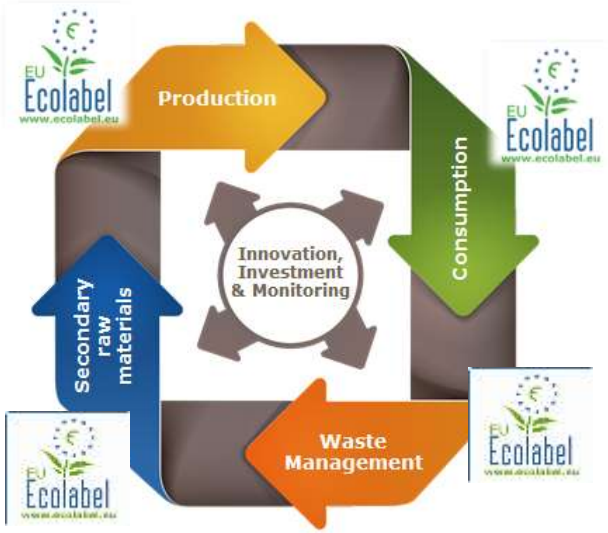
Ecodesign for Sustainable Product Regulation

ESPR WORK PLAN

European Commission

2. The EU Ecolabel (EUEL)

- The official European Union voluntary label for environmental excellence
- Established in 1992- Regulation (EC) 66/2010
- Managed by the European Commission and the Member States
- The only EU-wide ISO 14024 Type 1 Ecolabel: reliable; multi-criteria; life-cycle approach; open-transparent-multi-stakeholder and science-based




Raw materials


Minimising emissions


Design for recycling


Resources saving


Hazardous substances restriction


Waste reduction


Verified performance

2. EUEL benefits to applicants

- Certifies that product/service is **among the most environmentally-friendly in its class**
- Increases the **visibility of the product** on the market via/by benefitting from:
  - **EU Ecolabel logo,** which is recognized across Europe by millions of consumers.
  - **EU Ecolabel official catalogue http://ec.europa.eu/ecat/,** featuring products and the company.
  - **Marketing activities,** by the EC and the National Competent Bodies (e.g. online retailers collaboration)

- Contributes to **resource and monetary savings,** whilst improve the **image and growth of the company**
- **Potential** compliance and compatibility with Green Deal Legislation (e.g.GCD, ESPR)
- Easier access to Green Public Procurement (GPP)

Further information at https://environment.ec.europa.eu/topics/circular-economy/eu-ecolabel-home/product-groups-and-criteria_en or contacting helpdesk-eu-ecolabel@adelphi.de

European Commission

2. The EUEL 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]

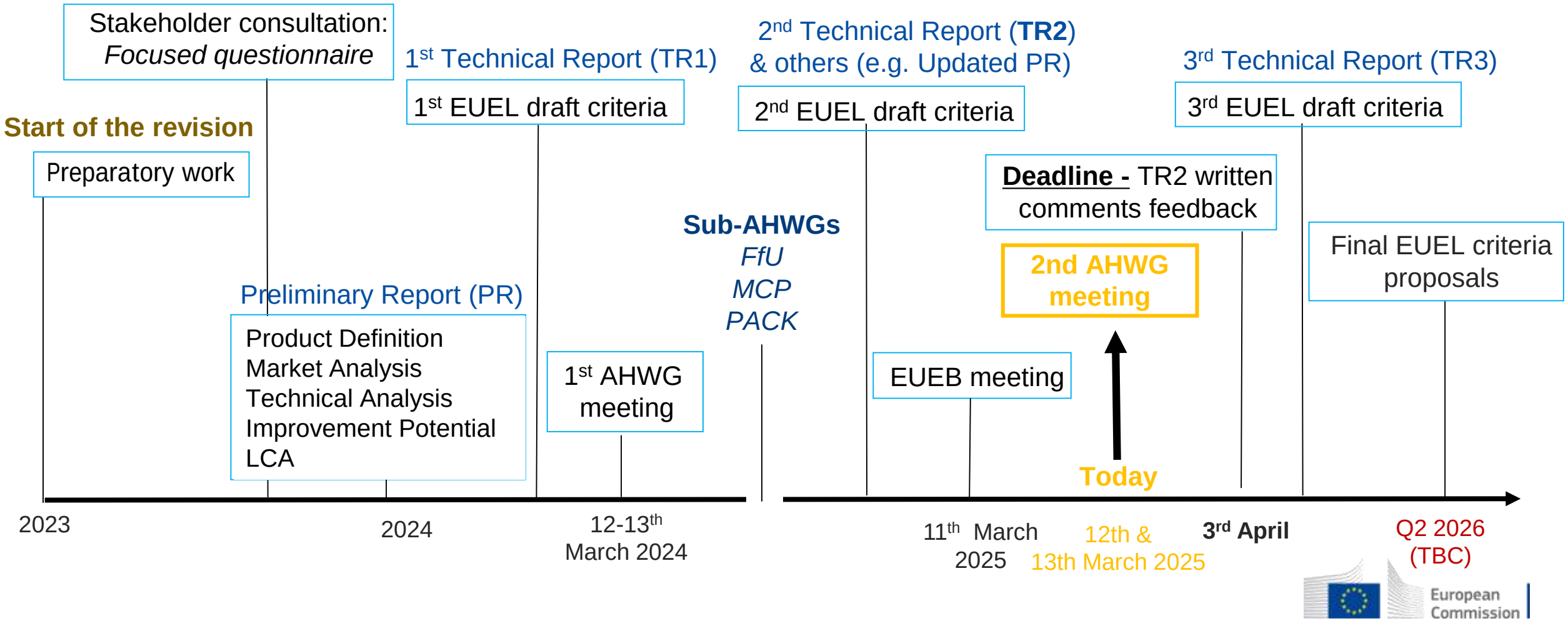
- Laundry detergents (LD) C(2017) 4243 [OJ L 180, 12.7.2017, p. 63–78]

- Industrial and institutional laundry detergents (IILD) C(2017) 4245 [OJ L 180, 12.7.2017, p. 79–96]

Validity expiry date 31/06/26

European Commission

2. The revision of the EUEL criteria Process and timeline



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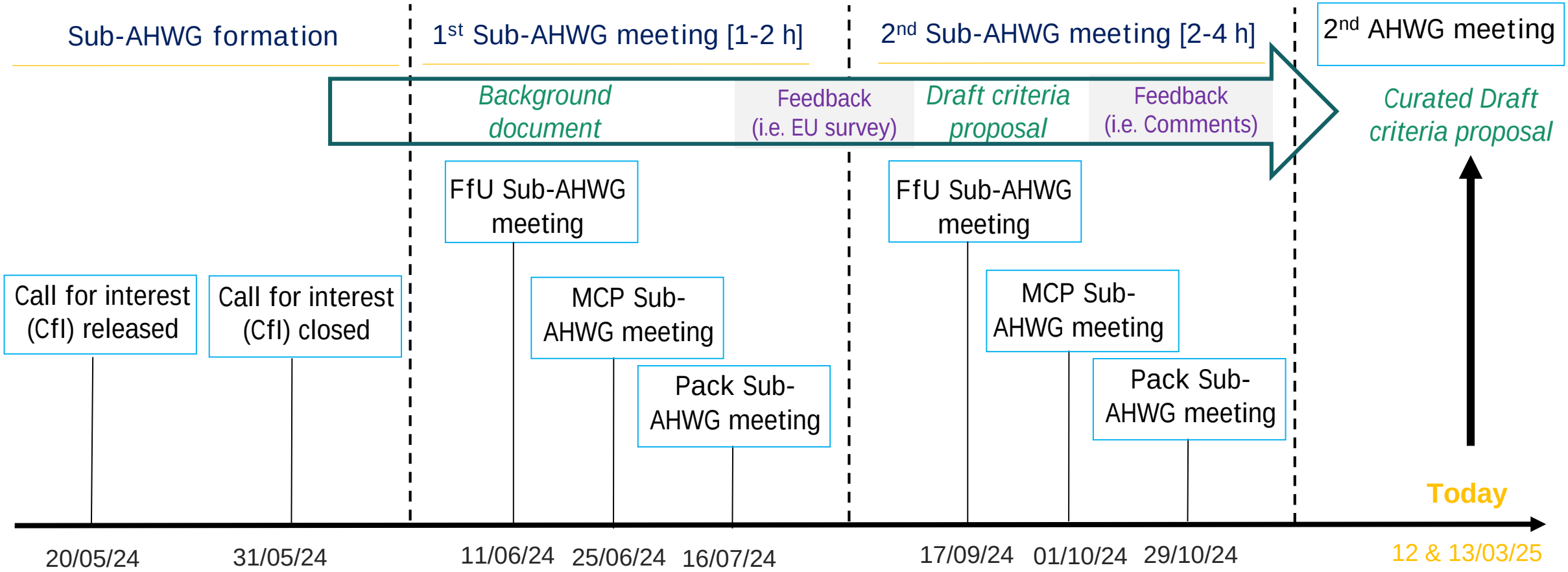
2. Sub-AHWGs “steps” (process) and timeline



European Commission

3. Preliminary background (PR) information

3. Legal

Detergents Regulation (648/2004/EC) & its revision (Regulation proposal COM(2023)217

EU Ecolabel (EUEL) criteria Commission Decisions

HDD 2017/1214/EU	DD 2017/1216/EU	LD 2017/1218/EU
IIDD 2017/1215/EU	HSC 2017/1217/EU	IILD 2017/1219/EU

EU Ecolabel Regulation (66/2010/EC)

Regulation 2012/528/EC on making available on the market and use of biocidal products (BPR)

Regulation 2008/1272/EC on classification, labelling and packaging of substances and mixtures (CLP) & its revision (2024/2865/EC)

Regulation 1907/2006/EC on the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)

Regulation 2024/1781/EC stablishing a framework for the setting of Ecodesign requirements for Sustainable Products (ESPR)

Empowering consumers for the green transition Directive (2024/825/EC)

Regulation on Packaging and Packaging Waste Directive (PPWR) (2025/40/EC)

Chemicals Strategy for Sustainability (e.g. package "*one substance, one assessment*"; "*Safe and sustainable by design*" framework)

Corporate Sustainability Reporting Directive (CSRD) (2022/2464)

Other ISO Type I Ecolabels: (e.g. Blue Angel; Nordic Swan)

Urban Waste Water Treatment Directive (UWWTD) (91/271/EEC)

Taxonomy Environment Delegated Regulation (2023/2486)

Other EUEL criteria: (e.g. Cosmetics - 2021/1870/EC)

Renewable Energy Directive (REDII;) (EC/2018/2001)

Water Framework Directive (2000/60/EC)

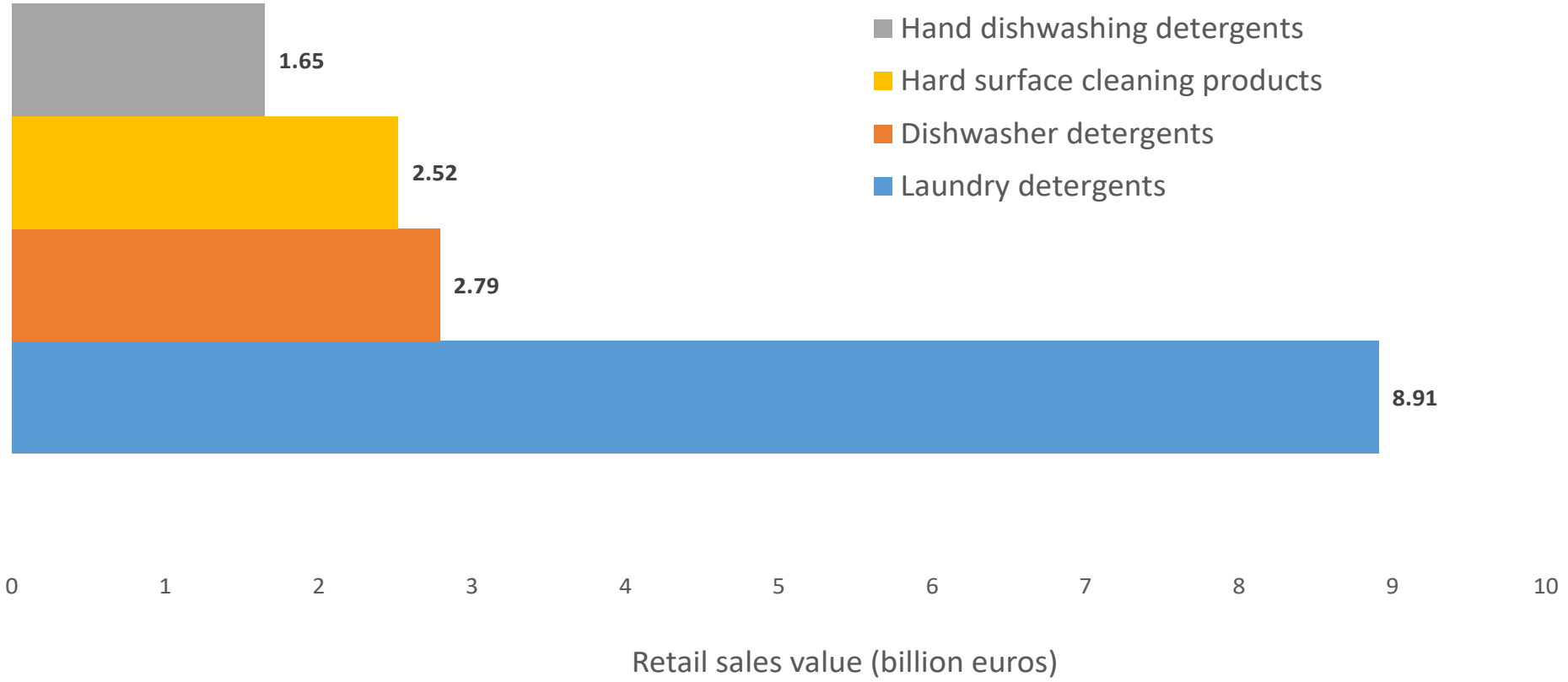
Deforestation Regulation (1115/2023/EC)

Proposal for Green Claims Directive (COM 2023/0085)

European Commission

3. Market analysis – Outline

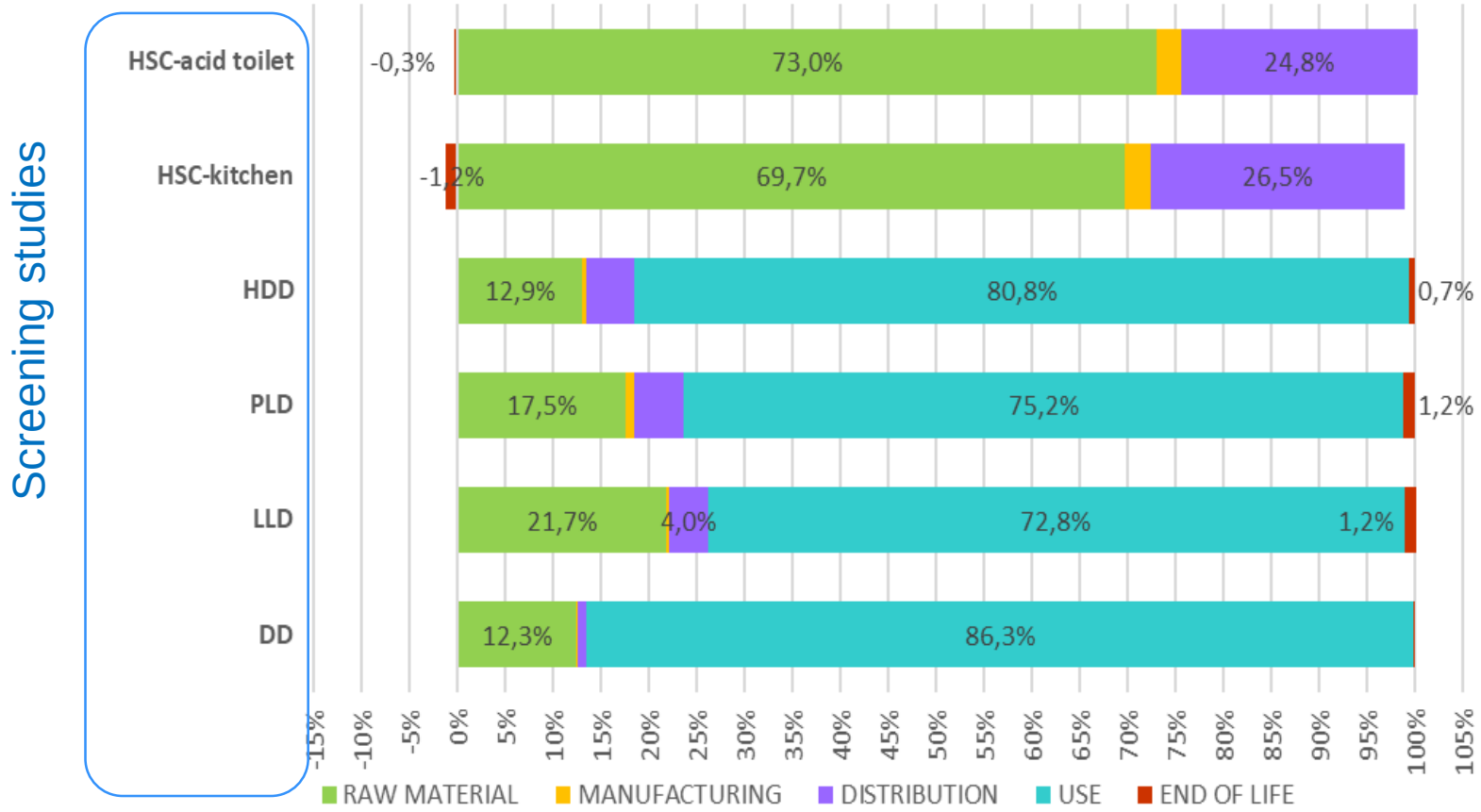
European (EU28) market size estimation of the EU Ecolabel product groups in 2021.



Source: *Euromonitor*

3. Technical analysis – LCA (I)

Comparison of relative life cycle stage contributions to overall PEF scores for six different detergent products/



PLD – Powder Laundry Detergent; LLD - Liquid Laundry Detergent; HSC – Hard Surface Cleaning; DD – Dishwashing detergent; HDD – hand-dishwashing detergent

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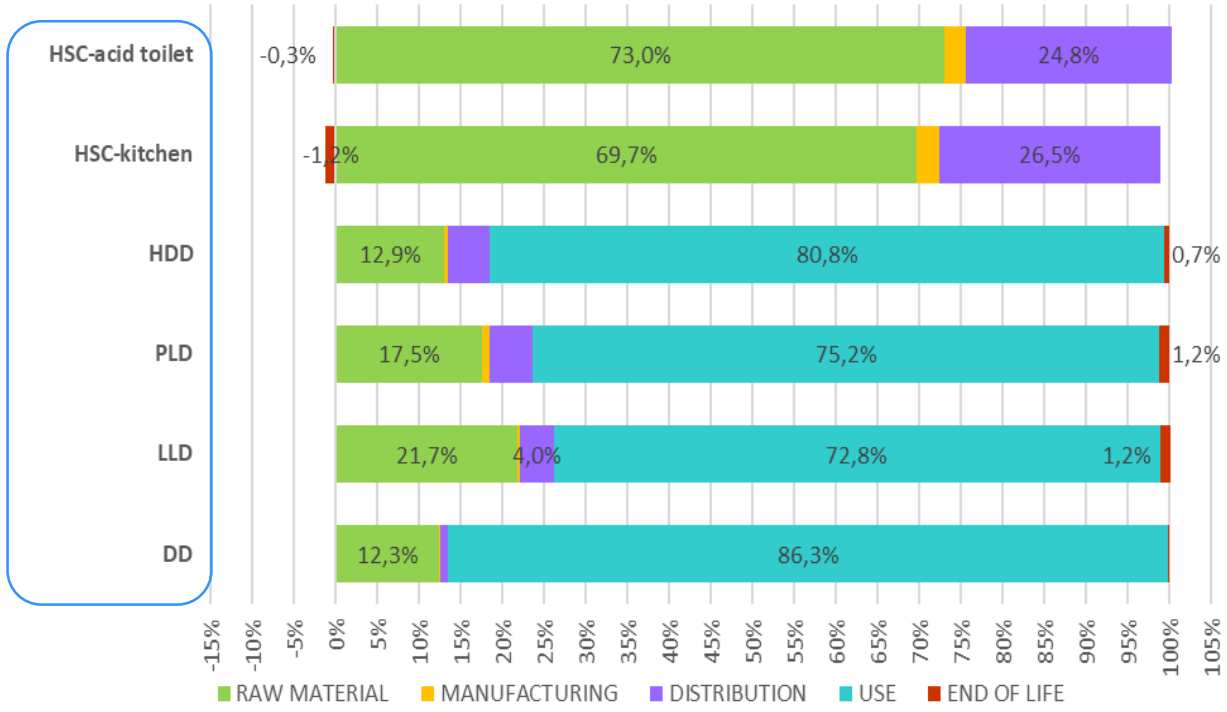
3. Technical analysis – LCA (II)

Conclusions remain; Figures could vary

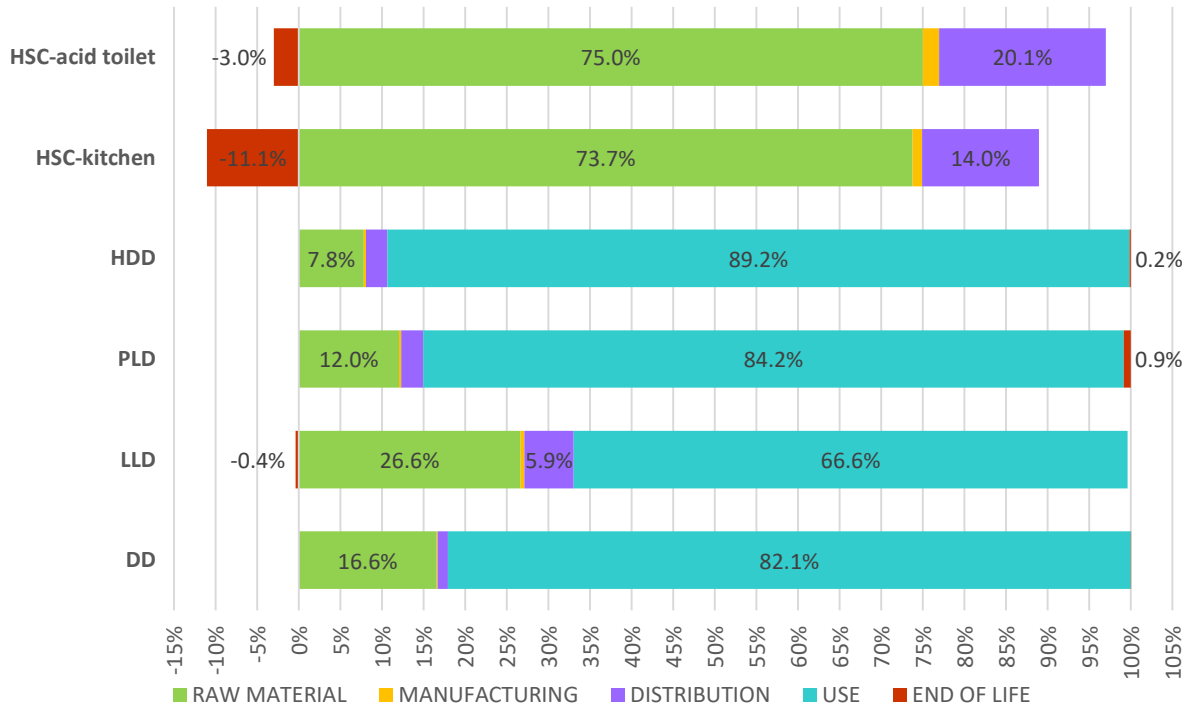
Comparison between PR2 & PR1 of relative life cycle stage contributions to overall PEF scores for six different detergent products

Screening studies

PR2



PR1



PLD – Powder Laundry Detergent; LLD - Liquid Laundry Detergent; HSC – Hard Surface Cleaning; DD – Dishwashing detergent; HDD – hand-dishwashing detergent

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3. Technical analysis – Non-LCA

PR1 to PR2 implied **further work** on the **assessment** of the **human health and environmental hazards** associated with detergent ingredients, as:

1. A review & screening of the CDV and CLP hazards for substances listed on the updated 2023 DID List.

2. A closer look at CLP classification status of preservatives

3. A review an average weighting of the CLP hazards that are restricted by EU Ecolabel criteria based on Safety Data Sheets (SDSs) provided (n=45).

4. A closer look at fragrances and their CLP hazards

5. A closer look at each of the main categories of surfactant as per the CESIO CLP recommendations

Questions / Comments?

European Commission

4. Scope and definitions

(Product group names)

4. Scope – Overview & general considerations

TR1

Considered

PG	Scope revision areas
LD?	Inclusion of fabric enhancers (softeners)
LD	Inclusion of in-wash stain removers
LD	Use of detergents that contains microorganisms.
HSC	Exclusion of the RTU products
LD	Temperature of laundry efficiency

e.g. Formulations

Safety

IF cleaning performance preserved

Not considered

PG	Scope revision areas
LD	Biocidal products
LD	Mono-ingredient products
LD	Outdoor/Special cleaning

TR2

Inputs received/research made not fully conclusive yet still open for inclusion

LD, HDD, HSC, IILD

Inputs received/research made support the proposals BUT with uncertainty areas . **Q1**

No changes (RTU not excluded). Can APC be restricted only to undiluted? **Q2**

Reverted back to 30C since performance likely compromised.

[ALL] *"The products claiming a biocidal effect are excluded from this product group."* **Q3**

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4. Scope – In-wash stain removers [LD]

Inclusion of In-wash stain removers in EUEL

Existing EUEL scope

- LD include only pre-treatment stain removers.
- IILD – in multi-component systems stain remover may be presents

Other Ecolabel

- Nordic Ecolabel - all types for LD & IILD
- Good Environmental Choice (Bra Miljöva) has a specific product category
- Eco Choice Aotearoa - incommercial & institutional laundry detergents.
- Blue Angel - LD ; includes pre-treatment laundry detergent boosters.

Cons:

- In-wash stain removers add additional and **potentially unnecessary chemical loa**d, as compared to pre-wash treatment.
- In-wash stain removers are generally considered auxiliary products **not strictly necessary for routine laundry cleaning**.

Pros:
In-wash stain removers **enhance cleaning performance**, potentially reducing the need for additional washes and conserving resources.

Pre-treatment stain removers are applied in limited doses directly to difficult stains, minimizing their overall chemical load while maximizing cleaning performance

From TR1 to TR2

High quality inputs received (e.g. performance, formulation, consumer behaviour)

However:

- Very few sources
- Not fully conclusive on the comparison Pre-treatment Vs In-wash.

Not proposed for inclusion BUT **still possible to include…**

… but further inputs/insights from more stakeholders required.

European Commission

4. Scope – Microbial containing products [LD, **HDD**, HSC, **IILD**]

Proposal for Detergent Regulation 2023/0124 (COD)

TR1

Article 2

Definitions

For the purpose of this Regulation, the following definitions apply:

(1) 'detergent' means any of the following:

– a substance, mixture or micro-organism, or two or more such materials in combination, which is intended for cleaning of fabrics, dishes or surfaces;

Industry stakeholders feedback

(existing innovation, reduced WWTP organic load)

Pros:

- Substitution of chemical ingredients while maintaining cleaning performance
- Reduced environmental footprint and/or impact (e.g. increased degradability).

Cons:

Uncertainty about **product** (biological) **safety (e.g.** risk to human health) (*).

Considered EUEL scope expansion

- HSC (professional *& household*)
- LD (*household*)

TR2

What was mentioned in TR1 is still valid BUT consider the following remarks (inclusive of uncertainty areas):

- Performance – no standardised method found / evidence sourced BUT controlled via *Fitness for Use.*
- Benefits/Impacts – scarce quantitative/qualitative evidences received/sourced BUT generally neutral or positive.
- Safety – (e.g. environmental) risk appraisal "locked" by microorganisms identification and lack of literature/evidences on environmental effects. The former is addressed in TR2 via *Microorganisms* sub-criterion (unequivocal identification).

Evidences can't 100% back up inclusion OR exclusion. Since MCP will met the most stringent quality controls in this sector & scope-wise mandatory regulation unlocks MO use, **the JRC have proposed (implicit) inclusion (except DD & IIDD).**

Question 1 (Q1 – Microorganisms) – Do you support the proposed inclusion of microorganisms within the scope of EUEL criteria (except DD and IIDD)? If not, would you support other configurations (e.g. only for professional use; only particular product groups)?

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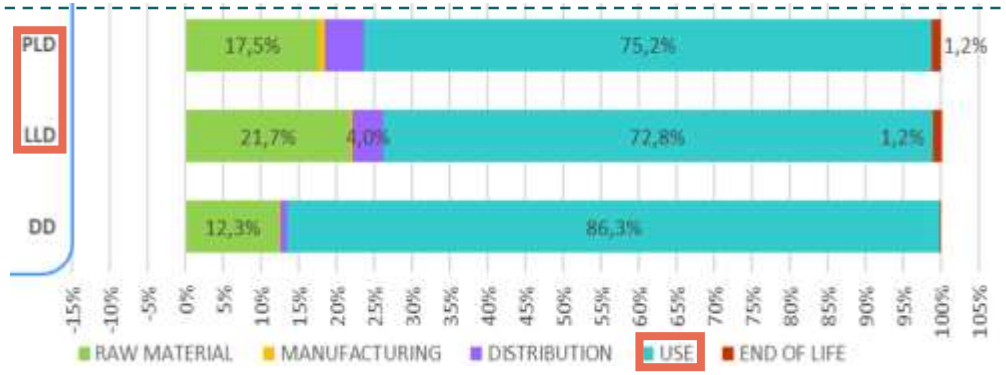
4. Scope – Temperature of laundry efficiency [LD]



TR1

Pros:
Decreased energy consumption (washing water heating).

Products effective at ≤ 20C are already in the market (*focused questionnaire*).

Cons *(trade-offs)*:
- Decreased cleaning performance.
- Additional chemical load (to keep cleaning performance).
- User behavior (misuse)

TR1 proposal -> decrease the minimum temperature efficiency to ≤ 20C & *only if product cleaning efficiency is maintained)*

… BUT performance (likely) compromised

TR2

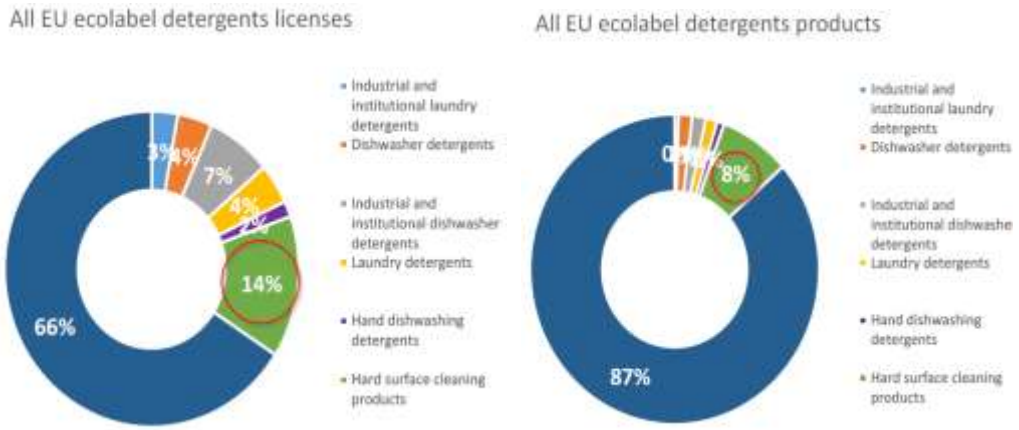
What was mentioned in TR1 is still valid BUT consider the following remarks, mostly about performance at 20C:

- Technical solutions unavailable… – without using more chemicals and/or washing time. Bleaching is impaired; and dissolution rates & stains removal are reduced.
- … is not market representative… – meaning most consumer won't use such temperature
- … or EUEL representative… – meaning most EUEL products not tested at 20C.
- … or easily implementable… – i.e. how to keep washing water temperature constant at 20C?

TR2 proposal -> revert back to ≤ 30C

4. Scope – The exclusion of RTU products [HSC]

TR1



Cons:

- Reduction of eligible products (as RTU holds significant [EUEL] market share).
- Reduced net environmental benefits (considering RTU market share).

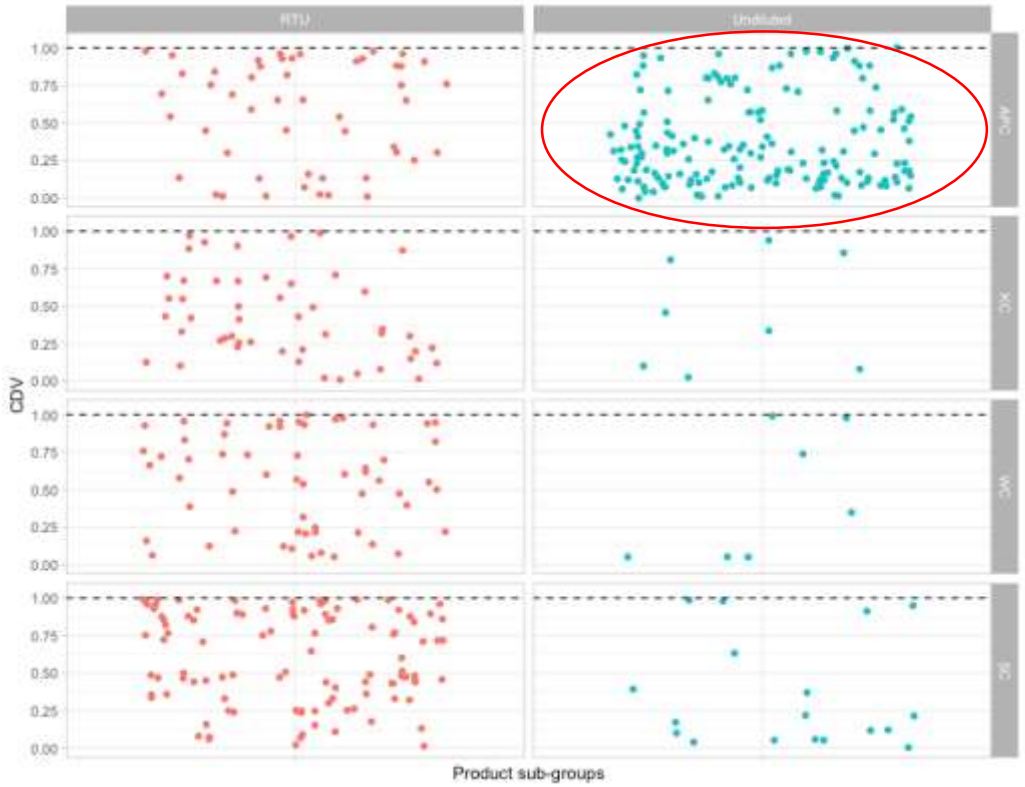
Pros:

- Additional environmental gains achievable with undiluted (more concentrated) versions (eg. via reduced distribution [transport] impacts).

TR2

As per TR1 + stakeholders consensus on keeping RTU products eligible given how practical and relevant they are.

Question 2 (Q2 – Exclusion of APC RTU) – Do you support excluding APC in RTU form? If so, would you support full ban irrespective of end-use (both private use and professional) or would you limit it to professional use only?



4. Definitions – Overview & general considerations

Updated

PG	Definition
ALL	Ingoing substances
	Impurities
	Composite packaging

Why?

To provide clarity on criteria implementation. **Q4**

Alignment with recently adopted PPWR text **Q6**

New

PG	Definition
ALL	Abrasives
	Opaque
	Recycled Material Recycled content Post-consumer material
	Renewable material
	Sustainable sourcing

To provide clarity on *Toxicity to aquatic organisms* criterion implementation. **Q10**

To ease on packaging-related criteria interpretation (e.g. *Recycled content)*.

To support *Sustainable sourcing […]* criterion interpretation.

Unchanged

PG	Scope revision areas	Remarks
ALL	Polymer	
	Synthetic polymer	Particle/weight limits **Q8**
	Microplastic	Origin (e.g. natural) **Q9**
	Packaging	
	Sales packaging	Cross-check Vs PPWR adopted text **Q6**
	Grouped packaging	
	Transport packaging	
	Nanomaterials	About particle size distribution. **Q7**
	Endocrine disruptors	
HSC	Undiluted product	
	Ready-to-Use (RTU) product	
LD	Heavy-duty detergent	
	Colour-safe detergent	
	Light-duty detergent	

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4. Definitions – Ingoing substance

Updated

		Remarks
Ingoing substances	*'ingoing substances' means all* substances ~~in the detergent/cleaner product, including additives (e.g. preservatives and stabilisers) in the raw materials.~~, *and regardless of amount, that are intentionally added to achieve or influence certain properties of the final product or its ingredients. Substances known to be released from ingoing substances (e.g. formaldehyde,* ~~from preservatives and~~ *arylamine from azodyes and azopigments and in-situ generated preservatives) shall also be regarded as ingoing substances.* ~~Unintended constituents (residuals, pollutants, contaminants, by-products, etc.) from production, incl. production of raw materials that remain in the raw materials ≥ 1 000 ppm (≥ 0,1000 %w/w ≥ 1 000 mg/kg) are always regarded as ingoing substances, regardless of the concentration in the final product;~~ *Impurities present in the final product in concentrations greater than or equal to 100 ppm (0,0100 % w/w, 100 mg/kg) or in supplied ingredients in concentrations greater than or equal to 1 000 ppm (0,100 %, 1 000 mg/kg), shall also be considered as ingoing substances.* *Foil that is not removed before use of the product and that is water soluble is considered as part of the formulation/recipe and therefore as an ingoing substance or substances.*	→ Irrespective of how much IF added for a purpose (eg fragrances) → Address the "gap" set in TR1 (*1000≤ ; ≥100ppm; what in between?)* & sets consistent use of impurities definition → Further clarity on when *foil* is an ingoing substance
Impurities	*'impurities' means unintended constituents (residuals, pollutants, contaminants, by-products, etc.)* ~~from production, incl. production of raw materials,~~ *that remain in the* ~~raw material/ingredient and/or in the in the final product~~ *EU Ecolabelled product in concentrations less than 100 ppm (0,0100 % w/w, 100 mg/kg)* ~~and that were not intentionally added.~~ *or that remain in the supplied ingredient or raw material in concentrations less than 1 000 ppm (0,100 % w/w, 1 000 mg/kg). Any unintended constituents present above these respective limits for the EU Ecolabelled product or the supplied ingredient or raw material shall instead be considered as ingoing substances.*	→ Wording simplification. → Differentiated threshold: EUEL product (100ppm <); Ingredient/raw material (1000 ppm <).

Question 4 (Q4 – Ingoing substances & Impurities) – Do you support the update made on the proposed definitions?

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4. Definitions – Packaging-related

Unchanged

Packaging (for **UM**), *sales packaging, grouped packaging, transport packaging*

Updated

Composite packaging	*composite packaging' means a unit of packaging made of two or more different materials~~, excluding materials used for labels, closures and sealing~~, which are part of the weight of the main packaging material and cannot be separated manually and therefore form a single integral unit, unless one of the materials constitutes an insignificant part of the packaging unit and in any event no more than 5 % of the total mass of the packaging unit and excluding labels, varnishes, paints, inks, adhesives and lacquers; this is without prejudice to Directive (EU) 2019/904;*

New

Opaque	*'Opaque' means a property of a PET plastic container that prevents the passage of light to such an extent that text placed directly against the container cannot be read. In this context, a container is classified as opaque if, when its walls are pressed together and placed against a white sheet with 5 mm black capital letters, the text is not visible using reflected light. This classification adheres to the UNI 1103801-2010 standard, distinguishing opaque containers from those that allow text readability, which are considered non-opaque.*
Recycled Material, Recycled Content Post-consumer material	*'Opaque' means a property of a PET plastic container that prevents the passage of light to such an extent that text placed directly against the container cannot be read. In this context, a container is classified as opaque if, when its walls are pressed together and placed against a white sheet with 5 mm black capital letters, the text is not visible using reflected light. This classification adheres to the UNI 1103801-2010 standard, distinguishing opaque containers from those that allow text readability, which are considered non-opaque.*

Question 5 (Q5 – Packaging) – Do you support including the *packaging* definition into the User Manual instead than in the legal text? If not, would you prefer to modify it to make it shorter? If so, do you have a proposal?

***Cross-check & alignment** with definitions in the adopted Regulation on Packaging and Packaging waste (Regulation (EU) 2025/40)*[1].

Question 6 (Q6 – Packaging) – Do you support full or partial alignment (i.e. certain definitions; *composite packaging)* with Regulation 2025/40 (Revised PPWD) definitions, meaning using literal text in such Regulation?

Added for **clarity** in ***Recycled content & Design for recycling*** criteria

[1] OJ L, 2025/40, 22.1.2025. Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC. Available at: http://data.europa.eu/eli/reg/2025/40/oj

European Commission

4. Definitions – Nanomaterial

Unchanged … **as** proposal aligned with EU COM recommendation[1] **widely supported** by stakeholders...

Nanomaterial	*'nanomaterial' means a natural, incidental or manufactured material consisting of solid particles that are present, either on their own or as identifiable constituent particles in aggregates or as an agglomerates, and **where 50 % or more of these particles in the number-based size** distribution fulfil at least one of the following conditions:* *a) one or more external dimensions of the particle are in the size range 1 nm to 100 nm;* *b) the particle has an elongated shape, such as a rod, fibre or tube, where two external dimensions are smaller than 1 nm and the other dimension is larger than 100 nm;* *c) the particle has a plate-like shape, where one external dimension is smaller than 1 nm and the other dimensions are larger than 100 nm.* *In the determination of the particle number-based size distribution, particles with at least two orthogonal external dimensions larger than 100 µm need not be considered.* *However, a material with a specific surface area by volume of < 6 m^2/cm^3 shall not be considered a nanomaterial.*

… **BUT** more restrictive limits were suggested via the **number-based size distribution (50%<;** i.e. France = 10%).

ANSES opinion[2] indicated (amongst others):

> *In order to have the most inclusive definition possible, the CES recommends extending the dimensional limits and advocates a lower value for the size distribution threshold than the one currently used.*

According to JRC guidance[3], nanomaterials definition could be adapted if fundamental concepts are not compromised.

Question 7 (Q7 – Nanomaterials) – Do you support lowering the number-based particle-size distribution below the 50% stated in the EU Commission recommendation on the definition of nanomaterial- 2022/C229/01 ()? Is so, which target (%) would you support).

[1] OJ C 229, 14.6.2022, p. 1–5 Commission Recommendation of 10 June 2022 on the definition of nanomaterial (Text with EEA relevance) 2022/C 229/01. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.C_.2022.229.01.0001.01.ENG

[2] Opinion of the French Agency for Food, Environmental and Occupational Health & Safety relating to the formal request on "Definition of nanomaterials: analysis, challenges and controversies". ANSES opinion Collective expert appraisal report. April 2023, https://www.anses.fr/en/system/files/AP2018SA0168RaEN.pdf

[3] European Commission. Joint Research Centre., Guidance on the Implementation of the Commission Recommendation 2022/C 229/01 on the Definition of Nanomaterial., Publications Office, LU, 2023. Available at: https://data.europa.eu/doi/10.2760/143118

European Commission

4. Definitions – Microplastic-related

Unchanged … **as** proposal aligned with REACH "*microplastics ban*" [1] was **widely supported** by stakeholders...

Microplastic (Synthetic polymer microparticles)

'microplastic' means polymers that are solid and which fulfil both of the following conditions:

a) are contained in particles and constitute at least 1 % by weight of those particles; or build a continuous surface coating on particles;

b) at least 1 % by weight of the particles referred to in point (a) fulfil either of the following conditions:*

i) all dimensions of the particles are equal to or less than 5 mm;

ii) the length of the particles is equal to or less than 15 mm and their length to diameter ratio is greater than 3.

**Where the concentration of synthetic polymer microparticles covered by this entry cannot be determined by available analytical methods or accompanying documentation, in order to verify the compliance with the concentration limit referred to in paragraph 1, only the particles of at least the following size shall be taken into account:*

(a) 0,1 µm for any dimension, for particles where all dimensions are equal to or smaller than 5 mm;

(b) 0,3 µm in length, for particles that have a length that is equal to or smaller than 15 mm and a length to diameter ratio greater than 3.

The following polymers are excluded from this designation:

a) polymers that are the result of a polymerisation process that has taken place in nature, independently of the process through which they have been extracted, which are not chemically modified substances;

b) polymers that are degradable as proved in accordance with Appendix 15;

c) polymers that have a solubility greater than 2 g/L as proved in accordance with Appendix 16;

d) polymers that do not contain carbon atoms in their chemical structure."

… **YET,** suggestions/concerns raised were:

1. Including soluble & biodegradable microplastics
2. Decreasing/removing lower limits (particle size/weight)
3. Not differentiating by source (petrochemical/"natural")

TR2 proposals (i.e. *Biodegradability*) account for concerns identified yet not pursuing full ban (technically feasible?).

Feedback welcomed to consider further stringency within EUEL criteria

Question 8 (Q8 – Microplastics [particle/weight limits]) – Would you support widening the scope of microplastics definition by decreasing the mass-based limit from 1% to a lower limit (i.e. 0.01%)? In addition, would you support decreasing or even not having lower limit based on the particle size?

Question 9 (Q9 – Microplastics [not differentiating by source]) – Would you support changing the *microplastic*-related definitions to ensure all polymers irrespective of their origin (*synthetic*; *natural*) are included in the scope of it? If so, could you provide a reasoned response/suggestion on how to do so (beyond what proposed in the main body of the text)?

[1] OJ L 238, 27.9.2023, p. 67–88 Commission Regulation (EU) 2023/2055 of 25 September 2023 amending Annex XVII to Regulation (EC) No 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) as regards synthetic polymer microparticles Available at: http://data.europa.eu/eli/reg/2023/2055/oj

4. Definitions – “Endocrine disruptors”

New

Complementing *Toxicity to Aquatic organisms* criterion.

Abrasives	*‘Abrasives’ means substances added to detergent and cleaning products to polish, buff, or scour away soils (e.g. dirt, dust, grime) and which effect their intended function primarily via physical means.*

Proposal based on sector specific terminology & exclusion of “chemical abrasives”

Question 10 (Q10 – Abrasives (new) – Do you support the proposed definition for “*abrasives*”?

Complementing *Sustainable sourcing […]* criterion.

Renewable material	*‘Renewable material’ is a material that is composed of biomass and that can be continually replenished’.*
Sustainable sourcing	*‘Sustainable sourcing’ means managing all aspects of the supply chain to source the materials, products and services an organization needs from its suppliers in a sustainable manner, that is, by ensuring that all management and operations are legal, economically viable, environmentally appropriate and socially beneficial.*

Question 11 (Q11 – Other – Provide comments that you deem relevant to any aspect of the *Definitions* section.

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4. Scope & Definitions – Questions recap (I)

SCOPE

Question 1 (Q1 – Microorganisms) – Do you support the proposed inclusion of microorganisms within the scope of EUEL criteria (except DD and IIDD)? If not, would you support other configurations (e.g. only for professional use; only particular product groups)?

Question 2 (Q2 – Exclusion of APC RTU) – Do you support excluding APC in RTU form? If so, would you support full ban irrespective of end-use (both private use and professional) or would you limit it to professional use only?

Question 3 (Q3 – **Exclusion of "biocidal products")** – Do you support excluding products claiming a biocidal effect? If so, do you support the proposed wording?

European Commission

4. Scope & Definitions – Questions recap (II)

DEFINITIONS

Question 4 (Q4 – Ingoing substances & Impurities) – Do you support the update made on the proposed definitions?

Question 5 (Q5 – Packaging) – Do you support including the *packaging* definition into the User Manual instead than in the legal text? If not, would you prefer to modify it to make it shorter? If so, do you have a proposal?

Question 6 (Q6 – Packaging) – Do you support full or partial alignment (i.e. certain definitions; *composite packaging)* with Regulation 2025/40 (Revised PPWD) definitions, meaning using literal text in such Regulation ? *Please, provide a reason response.*

Question 7 (Q7 – Nanomaterials) – Do you support lowering the number-based particle-size distribution below the 50% stated in the EU Commission recommendation on the definition of nanomaterial- 2022/C229/01 ()? Is so, which target (%) would you support).

Question 8 (Q8 – Microplastics [particle/weight limits]) – Would you support widening the scope of microplastics definition by decreasing the mass-based limit from 1% to a lower limit (i.e. 0.01%)? In addition, would you support decreasing or even not having lower limit based on the particle size?

Question 9 (Q9 – Microplastics [not differentiating by source]) – Would you support changing the *microplastic*-related definitions to ensure all polymers irrespective of their origin (*synthetic*; *natural*) are included in the scope of it? If so, could you provide a reasoned response/suggestion on how to do so (beyond what proposed in the main body of the text)?

Question 10 (Q10 – Abrasives (new) – Do you support the proposed definition for "*abrasives*"?

Question 11 (Q11 – Other – Provide comments that you deem relevant to any aspect of the *Definitions* section.

Questions / Comments?

European Commission

Revision of the EU Ecolabel criteria for
DETERGENT AND CLEANING PRODUCTS

BREAK (15')

ETIQUETTE FOR VIRTUAL MEETING PARTICIPANTS

- **Please indicate "NAME OF YOUR ORGANIZATION + YOUR FULL NAME"**
- **MUTE YOUR MIC AND SWITCH OFF you CAMERA (unless you have the floor)**
- **USE THE CHAT only to ask for the FLOOR (write "FLOOR" in the chat), and COMMENT only ORALLY**

Agenda

Day 1: Wednesday 12th March 2025 (Afternoon)

No	Item	SCHEDULE
1.	Opening of virtual room and welcome of participants	14:30 – 14:45
2.	Introduction, political objectives of the EU Ecolabel and process description	14:45 – 14:55
3.	Update of the preliminary background report	14:55 – 15:10
4.	Scope and definitions	15:10 – 15:50
	Coffee Break (15 min)	*15:50 - 16:05*
5.	Assessment and verification + Reference dosage + Criterion "Dosage requirements"	16:05 – 16:30
6.	Criterion "Biodegradability"	16:30 – 17:30

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5. Assessment and verification
Reference dosage
Criterion: “Dosage requirements

5. Assessment and verification

(a) Requirements

The list of all ingoing substances shall be provided to the competent body, indicating the trade name (if existing), the chemical name, the CAS No and/or the EC No, the DID No (2) (if existing), its function, form and concentration in mass percentage regardless of concentration in the final product formulation.¶

→ Added to aid in verification (i.e. no CAS No but granted EC No under REACH

Changes in suppliers and production sites pertaining to products to which the EU Ecolabel has been granted shall be notified to competent bodies, together with supporting information to enable verification of continued compliance with the criteria.¶

→ Question 12 (Q12) – Do you consider necessary to explicitly mention in it a defined timeline for suppliers change notifications? If so, which should be?

(b) Measurement thresholds;

(*1) 'no limit' means: regardless of the concentration (analytical limit of detection) for all substances with the exception of impurities, which can be present up to a concentration of 0,010 % by weight in the final formulation.¶

What does it mean **"*no limit*"? *LOD?***

Should **impurities** be **excluded** in all cases (e.g. SVHCs)?

Question 13 (Q13) – What changes/wording would you suggest? Would you remove the term "*no limit*" and use "*LOD*"? Would support including *impurities* in the aforementioned text, thus only allowing quantifiable substances below 0.01% to be present if a derogation supports them? If you support keeping the footnote, would you agree with the following wording? "*no presence of ingoing substances (under detection limits) with the exception/inclusive of impurities, which can be present up to a concentration of 0,010 % by weight in the final formulation*"

5. Reference dosage

Majorly unchanged except for IILD …

tThe highest dosage recommended by the manufacturer to wash one kilogram of dry laundry (indicated in g/kg of laundry or ml/kg of laundry) for three degrees of soiling (light, medium and heavy) and water hardness (soft, medium, hard).¶

All products in a multi-component system shall be included with the ~~worst-case~~ highest dosage for normally soiled textiles and hard water when assessments of the criteria are made.¶

…modified to ensure consistency with *Fitness for Use* performance framework.

5. EU Ecolabel criteria structure (I)

This is the **criteria structure** in current (***in force***) EUEL criteria…

Criterion	LD	IILD	DD	IIDD	HSC	HDD
1	Dosage requirement	Toxicity to aquatic organisms	Dosage requirement	Toxicity to aquatic organisms	Toxicity to aquatic organisms	Toxicity to aquatic organisms
2	Toxicity to aquatic organisms	Biodegradability	Toxicity to aquatic organisms	Biodegradability	Biodegradability	Biodegradability
3	Biodegradability	Sustainable sourcing of palm oil, etc.	Biodegradability	Sustainable sourcing of palm oil, etc.	Sustainable sourcing of palm oil, etc.	Sustainable sourcing of palm oil, etc.
4	Sustainable sourcing of palm oil, etc.	Restricted substances	Sustainable sourcing of palm oil, etc.	Restricted substances	Restricted substances	Restricted substances
5	Restricted substances	Packaging	Restricted substances	Packaging	Packaging	Packaging
6	Packaging	Fitness for use	Packaging	Fitness for use	Fitness for use	Fitness for use
7	Fitness for use	Automatic dosing systems	Fitness for use	Automatic dosing systems	User information	User information
8	User information	User information	User information	User information	Information on EU Ecolabel	Information on EU Ecolabel
9	Information on EU Ecolabel	Information on EU Ecolabel	Information on EU Ecolabel	Information on EU Ecolabel	n.a.	n.a.

European Commission, Joint Research Centre, Boyano, A.; Kaps, R.; Medyna, G.; Wolf, O, 2016. Revision of six EU Ecolabel criteria for detergents and cleaning products. Final Technical Report. Available at https://susproc.jrc.ec.europa.eu/product-bureau/sites/default/files/contentype/product_group_documents/1581681262/Technical%20background%20report.pdf

5. EU Ecolabel criteria - changes (III)

One legal annex per PG (n=6)
Criteria still widely “horizontal”, thus following this approach in TR2
There might be criteria numbering differences, depending on PG

Criterion
Dosage requirements (*Only LD, DD)*
Toxicity to aquatic organisms
Biodegradability
Sustainable sourcing of palm oil, palm kernel oil and their derivatives
Excluded and restricted substances
Packaging
Fitness for use
Automatic dosage system [*Only IILD, IIDD]*
User information
Information appearing on the EU Ecolabel

Sub-criterion
Specified excluded and restricted substances
Hazardous substances
Substances of very high concern (SVHCs)
Fragrances
Preservatives
Colouring agents
Enzymes
Corrosive properties (*Only for HDD*)
Micro-organisms (*LD, HDD, HSC, IILD*)

Recycled materials content
Weight/Utility ration (WUR)
Design for recycling
Products sold in spray bottles (*Only for HSC*)
Packaging take-back systems (*ALL*)

5. Criterion - Dosage requirements [DD; LD]

No changes BUT feedback suggested revising thresholds considering:

DD, LD¤	The reference dosage shall not exceed the following amounts:¤	
DD¤	**Product type¤**	**Dosage (g/wash)¤**
	Single-function dishwasher detergent¤	16.0¤
	Multi-function dishwasher detergent¤	18.0¤
	Rinse aids are exempted from this requirement.¤	
LD¤	**Product type¤**	**Dosage (g/kg of laundry)¤**
	Heavy-duty detergent, colour-safe detergent¤	12.2¤
	Light-duty detergent¤	12.2¤
	Stain remover (pre-treatment only)¤	2,7¤
DD, LD¤	*Assessment and verification:* the applicant shall provide the product label that includes the dosing instructions and documentation showing the density (g/ml) of liquid and gel products.¤	

- Water soluble foil impact → **Data wanted!**
- Performance implications

LD

Product (sub-)type	Number (n)	Reference dosage (g/kg laundry)	Standard deviation (g/kg laundry)
Heavy duty/Colour safe (HD) detergent	29	12.6	2.4
Light duty (LD) detergent	16	11.2	2.9

TR1 feedback (LD) -> e.g 15 g/kg laundry

Question 15 (Q15) – Would you support revising the threshold for LD - Heavy duty/Colour safe from 12.2 to 15.0 g/kg laundry (or a lower value)?

DD

Product (sub-)type	Number (n)	Reference dosage (g/wash)	Standard deviation (g/wash)
Multi-function (MF) detergent	12	18.2	2.3
Multi-function (SF) detergent	2	18.0	0.5

TR1 feedback (DD -> e.g. 15.0 or 18.5 g/wash

Question 16 (Q16) – Would you support revising the threshold for DD – ~~Multi-function~~ single function from 16.0 to 15.0 g/wash?

Typo/error – in TR2

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5. A&V; Ref. Dos.; Dos. Req. – Questions recap

Assessment and Verification

Question 12 (Q12) – [...] Do you consider necessary to explicitly mention in it a defined timeline for suppliers change notifications? If so, which should be?

Question 13 (Q13) – [...] What changes/wording would you suggest? Would you remove the term "*no limit*" and use "*LOD*"? Would support including *impurities* in the aforementioned text, thus only allowing quantifiable substances below 0.01% to be present if a derogation supports them? If you support keeping the footnote, would you agree with the following wording? "*no presence of ingoing substances (under detection limits) with the exception/inclusive of impurities, which can be present up to a concentration of 0,010 % by weight in the final formulation*" Please, provide a reasoned response.

Question 14 (Q14) – Please, provide any other comments that you deem relevant to any aspect of this section.

Dosage Requirements

Question 15 (Q15) – Would you support revising the threshold for LD - Heavy duty/Colour safe from 12.2 to 15.0 g/kg laundry (or a lower value)? Please, provide a reasoned response.

Question 16 (Q16) – Would you support revising the threshold for DD – Multi-function from 16.0 to 15.0 g/wash? Please, provide a reasoned response.

Question 17 (Q17) – Please, provide any other comments that you deem relevant to any aspect of this section.

[...] – question text shortened

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Questions / Comments?

European Commission

6. Biodegradability

6. Biodegradability – Background

The magnitude of product impact on the (aquatic) environment (either directly emitted or after WWT) results from the toxicity x persistence of its components. The criterion *Biodegradability* aims to decrease potential detrimental impacts via maximizing and/or ensuring that detergent and cleaning products ingredients are (bio)degradable.

Surfactants are key ingredients which could have poor (bio)degradability under (an)aerobic conditions.

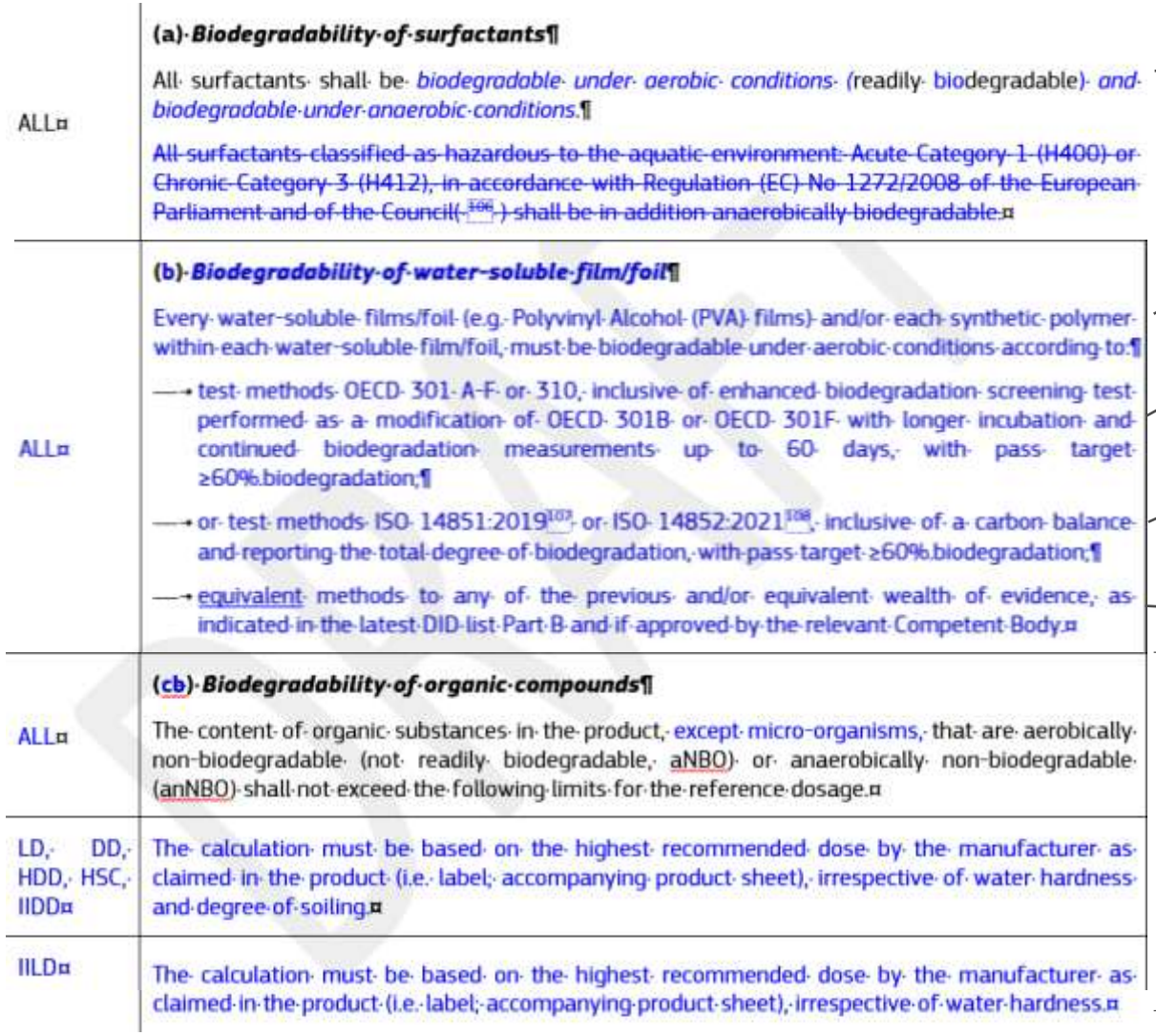
The potential impacts associated with **other non (bio)degradable organic substances (NBO)** is restricted, with thresholds set based on whether they are aerobically (**aNBO**) or anaerobically (**anNBO**) non-biodegradable.

In TR1 discussions about requiring all surfactants to be also **anaerobically biodegradable** primed & specific provision for **water-soluble foils** introduced

Proposals in TR1…

ALL	**(a) *Biodegradability of surfactants*** All surfactants shall be readily degradable (aerobically). All surfactants classified as hazardous to the aquatic environment: Acute Category 1 (H400) or Chronic Category 3 (H412), in accordance with Regulation (EC) No 1272/2008 of the European Parliament and of the Council([66]) shall be in addition anaerobically biodegradable.
DD, HDD, IIDD, IILD, LD	**(b) *Biodegradability of organic compounds*** The content of organic substances in the product that are aerobically non-biodegradable (not readily biodegradable, aNBO) or anaerobically non-biodegradable (anNBO) shall not exceed the following limits for the reference dosage:
HSC	**(b) *Biodegradability of organic compounds*** The content of organic substances in the product, except micro-organisms, that are aerobically non-biodegradable (not readily biodegradable, aNBO) or anaerobically non-biodegradable (anNBO) shall not exceed the following limits for the reference dosage.
ALL	For ingoing substances that are not included in Part A of the DID list, the relevant information from literature or other sources, or appropriate test results, showing that they are aerobically and anaerobically biodegradable shall be provided, as described in Part B of that list. Water-soluble foil/films (e.g., Polyvinyl Alcohol (PVA) films) shall be readily biodegradable according to test method OECD 301 A-F or 310, as reported in Part B of the DID list.

6. Biodegradability – Changes overview



ALL	**(a) *Biodegradability of surfactants*** All surfactants shall be *biodegradable under aerobic conditions* (readily biodegradable) *and biodegradable under anaerobic conditions*. ~~All surfactants classified as hazardous to the aquatic environment: Acute Category 1 (H400) or Chronic Category 3 (H412), in accordance with Regulation (EC) No 1272/2008 of the European Parliament and of the Council([106]) shall be in addition anaerobically biodegradable.~~
ALL	**(b) *Biodegradability of water-soluble film/foil*** Every water-soluble films/foil (e.g. Polyvinyl Alcohol (PVA) films) and/or each synthetic polymer within each water-soluble film/foil, must be biodegradable under aerobic conditions according to: → test methods OECD 301 A-F or 310, inclusive of enhanced biodegradation screening test performed as a modification of OECD 301B or OECD 301F with longer incubation and continued biodegradation measurements up to 60 days, with pass target ≥60% biodegradation; → or test methods ISO 14851:2019[107] or ISO 14852:2021[108], inclusive of a carbon balance and reporting the total degree of biodegradation, with pass target ≥60% biodegradation; → equivalent methods to any of the previous and/or equivalent wealth of evidence, as indicated in the latest DID list Part B and if approved by the relevant Competent Body.
ALL	**(cb) *Biodegradability of organic compounds*** The content of organic substances in the product, except micro-organisms, that are aerobically non-biodegradable (not readily biodegradable, aNBO) or anaerobically non-biodegradable (anNBO) shall not exceed the following limits for the reference dosage.
LD, DD, HDD, HSC, IIDD	The calculation must be based on the highest recommended dose by the manufacturer as claimed in the product (i.e. label, accompanying product sheet), irrespective of water hardness and degree of soiling.
IILD	The calculation must be based on the highest recommended dose by the manufacturer as claimed in the product (i.e. label, accompanying product sheet), irrespective of water hardness.

Precautionary principle + alignment with other ecolabels — **Q28**

Assessment can be made at polymer OR foil level, as justified by testing method used.

OECD methods quoted in DID list + alignment with NS

Proposing standard methods best suited to the nature of materials to be biodegraded (e.g. poor solubility; representative ref. material) — **Q26**

Providing flexibility on testing methods

Significantly tightening aNBO / annNBO ambition level & discussing feasibility of changing threshold structure (e.g. IIDD, IILD). — **Q27** **Q29**

Clarifying how to perform calculations for purposes of aNBO / annNBO compliance

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6. Biodegradability – Changes overview

Assessment & Verification

ALL

Assessment and verification: the applicant shall provide documentation for the biodegradability of surfactants and the water soluble films/foils or each synthetic polymer contained within, as well as the calculation of aNBO and anNBO for the product. A spreadsheet for calculating aNBO and anNBO values is available on the EU Ecolabel website.¶

For ~~both~~ the biodegradability of surfactants, the water soluble films/foils or each synthetic polymer contained within and the aNBO and anNBO values for organic compounds, reference shall be made to the most updated DID list.¶

For ingoing substances that are not included in Part A of the DID list, the relevant information from literature or other sources, or appropriate test results, showing that they are aerobically and anaerobically biodegradable shall be provided, as described in Part B of that list. For the case of ingoing substances tested following ISO 14851:2019[109] or ISO 14852:2021[110] methods, the testing documentation must also include the carbon balance calculations and the total degree of biodegradation results.¶

~~Water-soluble foil/films (e.g., Polyvinyl Alcohol (PVA) films) shall be readily biodegradable according to test method OECD 301 A-F or 310, as reported in Part B of the DID list.~~¶

In the absence of documentation for biodegradability described above, an ingoing substance other than a surfactant may be exempted from the requirement for anaerobic biodegradability if not toxic to aquatic organisms (NOEC/ECx > 0.1 mg/l or LC50/EC50/IC50>10 mg/l) and if one of the following three alternatives is fulfilled:¶

(1) it is readily degradable and has low adsorption (A<25%);¶

(2) it is readily degradable and has high ~~add~~esorption (D>75%);¶

(3) it is readily degradable and non-bio-accumulating ~~(-[111]-)~~¶

Testing for adsorption/desorption shall be conducted in accordance with of the Organisation for Economic Co-operation and Development (OECD) Guideline 106.¶

A substance is considered to be not bio-accumulating if the BCF is < 100 (according to OECD 305) or log K_{ow} is < 3,0 (according to OECD 107 or 117). If both the BCF and log K_{ow} values are available, the highest measured BCF value shall be used.¤

Assessment can be made at polymer OR foil level, as justified by testing method used.

Requesting carbon balance for enhanced reliability of results quoted (as suggested by standard)

New condition in alignment with NS **Q30**

Wording improvement
(typo, acronym & footnote added to main text)

European Commission

6. Biodegradability – Surfactants

Main streams of evidences:

- Stakeholders feedback (TR1)
- Other ecolabels;
- Literature (Scientific/technical);

AGAINST

- Aerobic biodegradation as dominant & relevant process (e.g. SCHEER 2008).
- Lack of readily available data (not required by REACH & DID list appears as not comprehensive) which difficult implementation/verification.
- Some non-anaerobically biodegradable surfactants have essential performance role (e.g. IILD).

IN FAVOR

- IF by-passing WWTP or released (i.e. sewage sludge) into environment (water, soil, sediments), they could cause risk of toxic effects, thus advisable a precautionary principle.
- Feasibility of compliance as set in other ecolabel schemes (i.e. NS all PGs except DD; BA all under its scope) and as observed in limited set of formulations JRC accessed.

So far, most environmentally favorable (risk-wise) **approach** take understanding it as **technically feasible** BUT it can changes depending on specific TR2 feedback

Question 28 (Q28) – Would you support having exemptions to the requirements on all surfactants to be aerobic and anaerobic biodegradable? If so, which could these be and, especially, under the scope of which product groups?

Question 31 (Q31) – Please, share any other comments/suggestions you deem relevant about this criterion providing reasons supporting them.

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6. Biodegradability – Water soluble foil

Main streams of evidences:

- Stakeholders feedback (TR1)
- Legislation (REACH microplastics)
- Literature (Scientific/technical);
- Other ecolabels

- Feedback suggested considering alternative methods for polymers to OECD methods (OECD 301 A-F / 310).
- ISO 14851[1] and 14852[2] (ultimate aerobic biodegradation ; O^2 and CO_2, respectively) have comparative advantages:
  - target plastic materials in aquatic compartments.
  - reference material - biodegradable polymers.
  - suggest complementary carbon balance for calculation of the extend of biodegradation.

- NS and BA allow adaptations of DID list (OECD methods 301B & 301F and 301B to 301F, respectively), as extending testing period (60 days) with pass criteria ≥60 %
- They differ in target (NS – WS film; BA – all polymers) and if they allow inherent biodegradability testing (BA - OECD 302C Vs NA – only readily biodegradability)

TR2 proposal aligns with former elements but aiming at allowing “flexible approach” (film / polymer assessment; alternative methods)

Question 28 (Q28) – Would you support having exemptions to the requirements on all surfactants to be aerobic and anaerobic biodegradable? If so, which could these be and, especially, under the scope of which product groups?

[1] International Standard ISO 14851:2019 Determination of the ultimate aerobic biodegradability of plastic materials in an aqueous medium — Method by measuring the oxygen demand in a closed respirometer Edition 2 2019-03. https://www.iso.org/standard/70026.html

[2] International Standard ISO 14852:2021 Determination of the ultimate aerobic biodegradability of plastic materials in an aqueous medium — Method by analysis of evolved carbon dioxide Edition 3 2021-06 https://www.iso.org/standard/80303.html.

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6. Biodegradability – Biodegradability methods (I)

Type of Biodegradability	Test	Method	Test principle	Remarks
Ready biodegradability	DOC-die-away-test	OECD 301 A (1992), ISO 7827 (2010)	Static aerobic test system, measurement of DOC removal	Non-volatile water-soluble compounds
Ready biodegradability	CO2 evolution test	OECD 301 B (1992), ISO 9439 (1999)	Static aerobic test system, measurement of CO2 production	Non-volatile water-soluble compounds
Ready biodegradability	Continuous CO2 evolution test	OECD 301 B (1992), ISO 9439 (1999)	Static aerobic test system, online measurement of CO2 production by conductivity measurement	Volatile/non-volatile water-soluble compounds, applied both as open and closed system
Ready biodegradability	Modified MITI (I) test	OECD 301 C (1992)	Static aerobic test, BOD determination, specific analysis possible	Non-volatile, water-soluble compounds; Closed bottle test
Ready biodegradability	Modified OECD screening test	OECD 301 E (1992), ISO 7827 (2010)	Static, aerobic test, measurement of DOC removal	Non-volatile water-soluble compounds at Low inoculum concentration
Ready biodegradability	Manometric respirometry test	OECD 301 F (1992), ISO 9408 (1999)	Static, aerobic test, measurement of BOD, and comparison to COD and ThOD of the test substance	Poorly water-soluble, non-volatile, and volatile compounds
Ready biodegradability	CO2 headspace test	OECD 310 (2014), ISO 14593 (1999)	Static aerobic test, measurement of CO2 evolution	Volatile compounds, comparable to the CO2 evolution test
Ready biodegradability	Biodegradability in seawater	OECD 306 H (1992), ISO 16221 (2001)	Static aerobic test system, measurement of DOC removal	Non-volatile water-soluble compounds,
Inherent biodegradability	Modified SCAS Test (Semi-continuous activated sludge)	OECD 302 A (1981), ISO 9887 (1992)	Semi-static, aerobic test system, fill- and draw method, measurement of DOC removal, test period up to 26 weeks	Non-volatile, water-soluble compounds, pre-adaptation and specific analysis to determine primary biodegradation possible
Inherent biodegradability	Zahn-Wellens/EMPA Test	OECD 302 B (1992), ISO 9888 (1999)	Static, aerobic test system, high test compound, and inoculum concentration, measurement of DOC removal	Non-volatile, water-soluble compounds
Inherent biodegradability	Modified MITI (II) Test	OECD 302 C (1981)	Static, aerobic test system, comparable to OECD 302 B (1992) but a specially prepared inoculum is required	Non-volatile, water-soluble compounds
Inherent biodegradability	Inherent biodegradability in soil	OECD 304 A (1981)	Static, aerobic test, addition of 14C labeled test compound, determination of 14CO2	Closed system; volatile/non-volatile and soluble/non-soluble compounds

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Source: Strotman et al. (2023)

['Toward the Future of OECD/ISO Biodegradability Testing-New Approaches and Developments', Applied Microbiology and Biotechnology, Vol. 107, No. 7–8, April 2023, pp. 2073–2095. DOI: 10.1007/s00253-023-12406-6

6. Biodegradability – Biodegradability methods (I)

Type of Biodegradability	Test	Method	Test principle	Remarks
Simulation test	Aerobic sewage treatment	OECD 303 A (2001), OECD 303 B (2001)	Static, aerobic test system, measurement of DOC or COD decrease	Non-volatile, water-soluble, or dispersible compounds
Simulation test	Aerobic and anaerobic transformation in soil	OECD 307 (2002)	Static aerobic/anaerobic test, use of 14C labeled compounds, measurement of 14CO2 formation	Volatile water-soluble and poorly water-soluble compounds
Simulation test	Aerobic and anaerobic transformation in aquatic sediment systems	OECD 308 (2002)	Static aerobic/anaerobic test, use of labeled/unlabeled compounds, analysis of original compound, and transformation products	Non-volatile and slightly volatile compounds
Simulation test	Aerobic mineralisation in surface water	OECD 309 (2004)	Static/semi-continuous aerobic test system, use of labeled (14C)/unlabeled compounds, determination of primary/ultimate biodegradation	Non-volatile/slightly volatile compounds. water-soluble/poorly water-soluble compounds
Simulation test	Simulation tests to assess the biodegradability of chemicals discharged in waste water	OECD 314 (2008) A- Biodegradation in Sewer system B- Biodegradation in activated sludge test C - Biodegradation in anaerobic digester sludge test D- Biodegradation in treated effluent-surface water mixing zone test E - Biodegradation in untreated wastewater-surface water mixing zone test	Open/closed gas flow-through static systems, determination of primary/ultimate biodegradability, determination of transformation products, use of radiolabeled compounds recommended, but non labeled compounds permitted when an analytical procedure is given	All stages of wastewater treatment plant, volatile/non- volatile compounds, assessment of a mass balance
Other biodegradability test	Anaerobic biodegradation test	OECD 311 (2006), ISO 11734 (1995)	Static, anaerobic test system, measurement of biogas production (CH4/CO2), test duration up to 60 days, inoculum:anaerobic sludge	Compounds in concentrations of 20 - 100 mg L-1 organic carbon
Other biodegradability test	Aerobic composting test	ISO 14855-1 (2012)	Static aerobic test system, use of an adsorbing material (Vermiculite) possible, measurement of CO2 production or oxygen depletion, extended test duration, higher test temperature	Solid polymeric compounds
Other biodegradability test	Biodegradation of polymers in aquatic environment	ISO 14851 (2019) - Oxygen depletion ISO 14852 (2021) - CO2 evolution	Static aerobic test system, measurement of CO2 production or oxygen depletion, medium with a higher buffer capacity, extended test duration	Miscible and water soluble polymeric compounds
Other biodegradability test	Low concentration tests in water	ISO 14592 (2002)	Guideline to perform biodegradation tests at very low concentrations	
Other biodegradability test	Guidance for poorly water-soluble compounds	ISO 10634 (2018)	Guideline to perform biodegradation tests with poorly water-soluble compounds	
Other biodegradability test	Guidance for selection of biodegradation tests	ISO 15462 (2006)	Tests in the aquatic environment	*Source:* Strotman et al. (2023)[1]

[1] 'Toward the Future of OECD/ISO Biodegradability Testing-New Approaches and Developments', Applied Microbiology and Biotechnology, Vol. 107, No. 7–8, April 2023, pp. 2073–2095. DOI: 10.1007/s00253-023-12406-6

6. Biodegradability – Organic compounds (aNBO; anNBO)

Main streams of evidences:

- Focused questionnaire (**JRC data analysis**)
- Stakeholders feedback (TR1)
- Other ecolabels (NS, BA)

Methodological remarks in Annex 1 & rationales, as:

- Qualitative & quantitative inputs (CDV, **aNBO, anNBO**, elemental P, VOCs, WUR).
- Inputs = 10% total EUEL products (2024); By PG 6 – 12%; highest for HSC.
- Data entry = **unique combination of formula + packaging** (worst WUR).
- Data quality checks/curation – can result in dropping data (45% on average).
- Data factored by existing EUEL threshold (**range 0 – 1**) in plots.
- Descriptive statistics – generally **3rd quartile** as reference; **MAX if few data**.
- Assumptions – required when data lacked required metadata (format)
- Limitations
  - Limited data in particular product groups (i.e. HSC, IILD)
  - Lack of granularity – *to which (sub-)categorization does it belong?*
  - Limited full formulation access versus data inputs received for particular traits (eg. CDV, anNBO/anNBO)

Question 29 (Q29) – Please, could you share feedback on the feasibility of the aNBO and anNBO thresholds proposed, particularly for HSC and IILD product groups? The data available did not allow in particular cases to draw robust conclusions, thus it is critical to receive further feedback/data to ensure feasibility and proportionality.

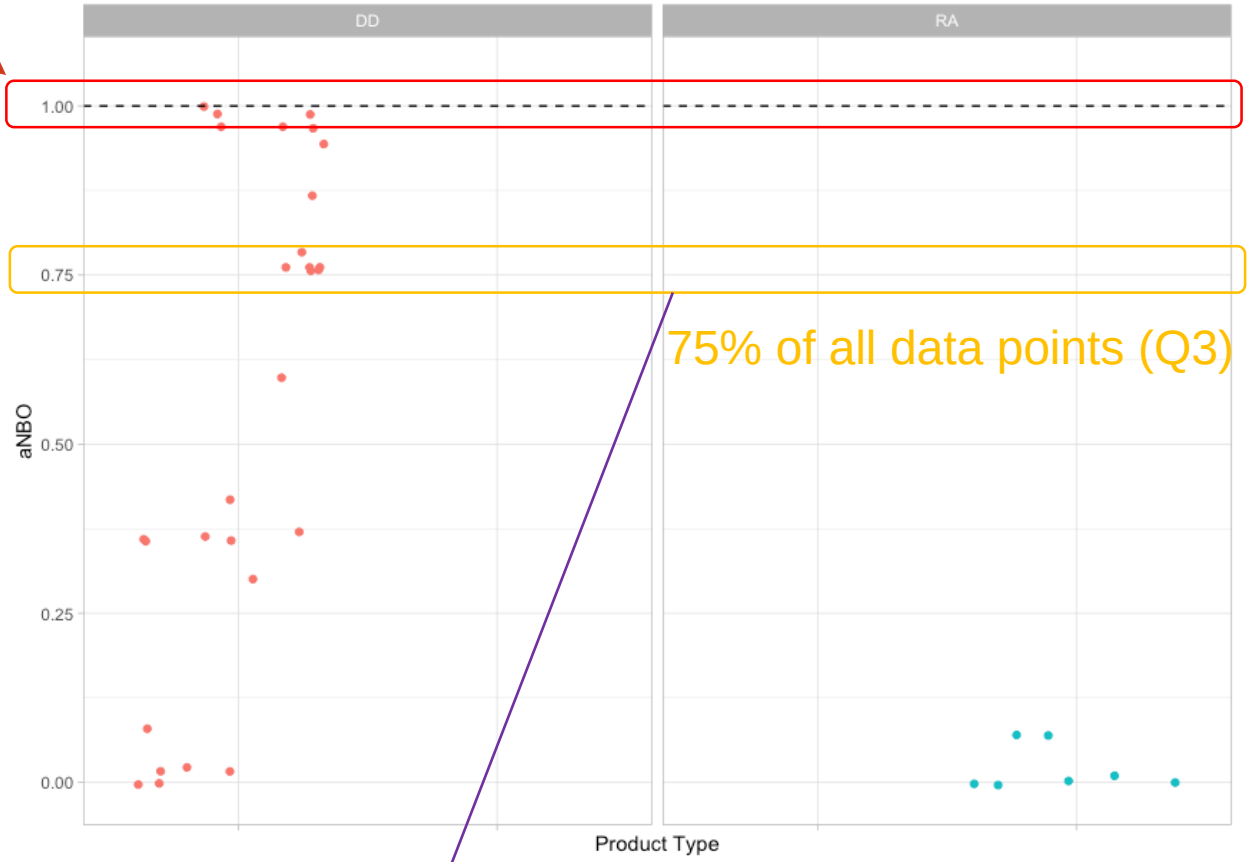
European Commission

6. Biodegradability – Organic compounds (DD - aNBO)

EUEL criteria existing threshold
(*Maximum value*)

aNBO (g/wash)

Product type	Acronym	Existing	TR1	TR2	Number (n)	Data Analysis	Other ecolabels
Dishwasher detergents	DD	1,00	1,00	**0,90**	*28*	0.89	1.00 (BA)
Rinse aids	RA	0,15	0,15	**0,15**	*4*	0.01	0.15 (BA)



ERROR – in PTT
See corrected slide (next one)

European Commission

CORRECTED SLIDE (See previous)

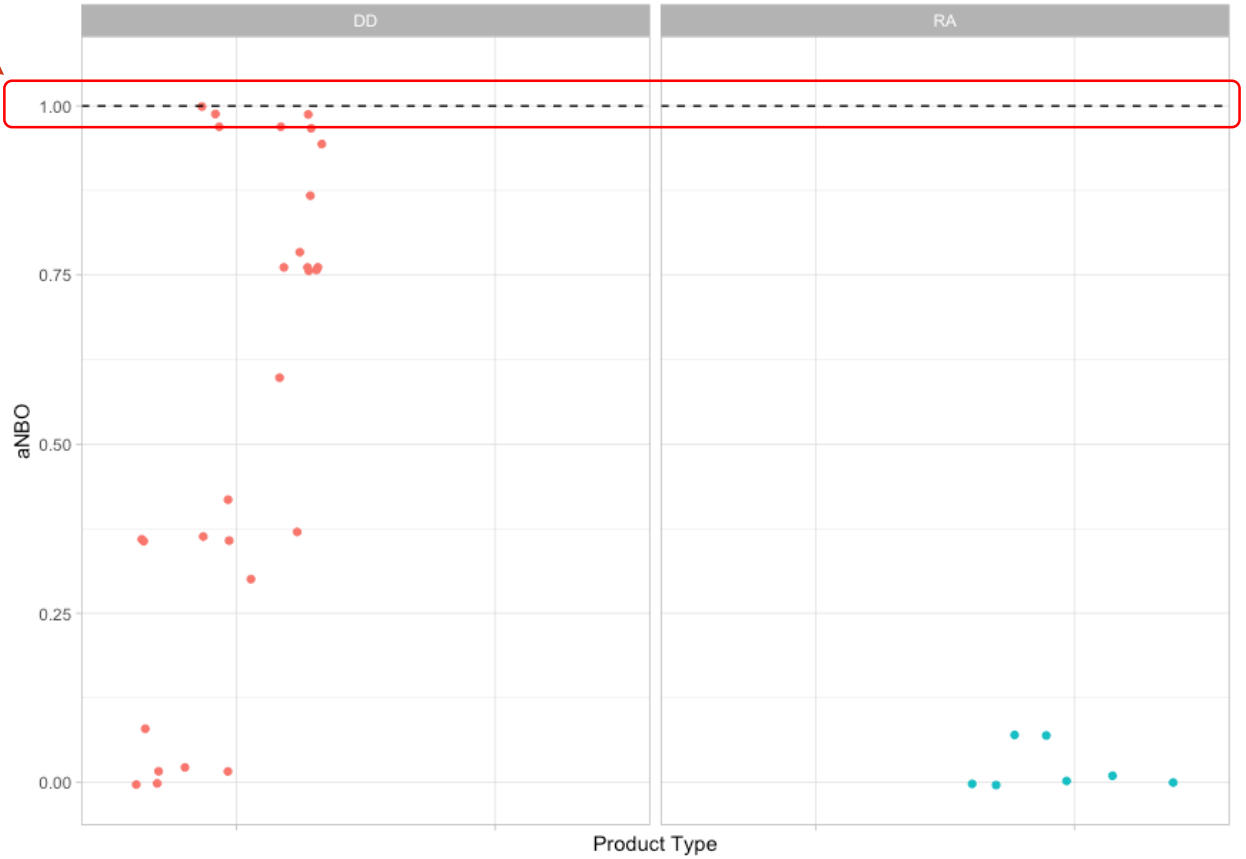
6. Biodegradability – Organic compounds (DD - aNBO)

EUEL criteria existing threshold
(*Maximum value*)

aNBO (g/wash)

Product type	Acronym	Existing	TR1	TR2	Number (n)	Data Analysis	Other ecolabels
Dishwasher detergents	DD	1,00	1,00	**0,90**	*28*	0.89	1.00 (BA)
Rinse aids	RA	0,15	0,15	**0,15**	*4*	0.01	0.15 (BA)

75% of all data points (Q3)

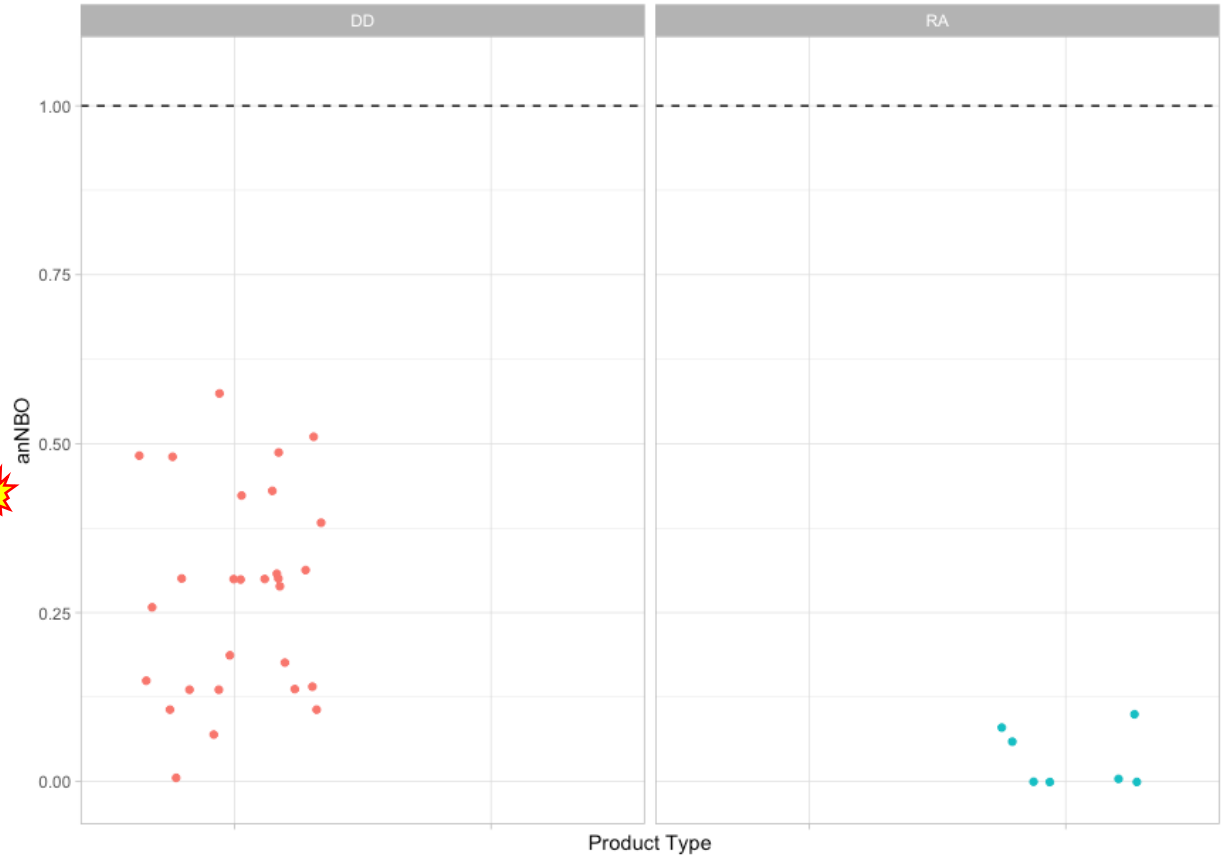


European Commission

6. Biodegradability – Organic compounds (DD - anNBO)

anNBO (g/wash)

Product type	*Acronym*	*Existing*	*TR1*	*TR2*	*Number (n)*	*Data analysis*	*Other ecolabels*
Dishwasher detergents	DD	1,00	3,00	**1.20**	*28*	1.18	3.00 (BA) 1.20 (NS)
Rinse aids	RA	0,15	0,50	**0.30**	*4*	0.05	0.50 (BA) 0.30 (NS)

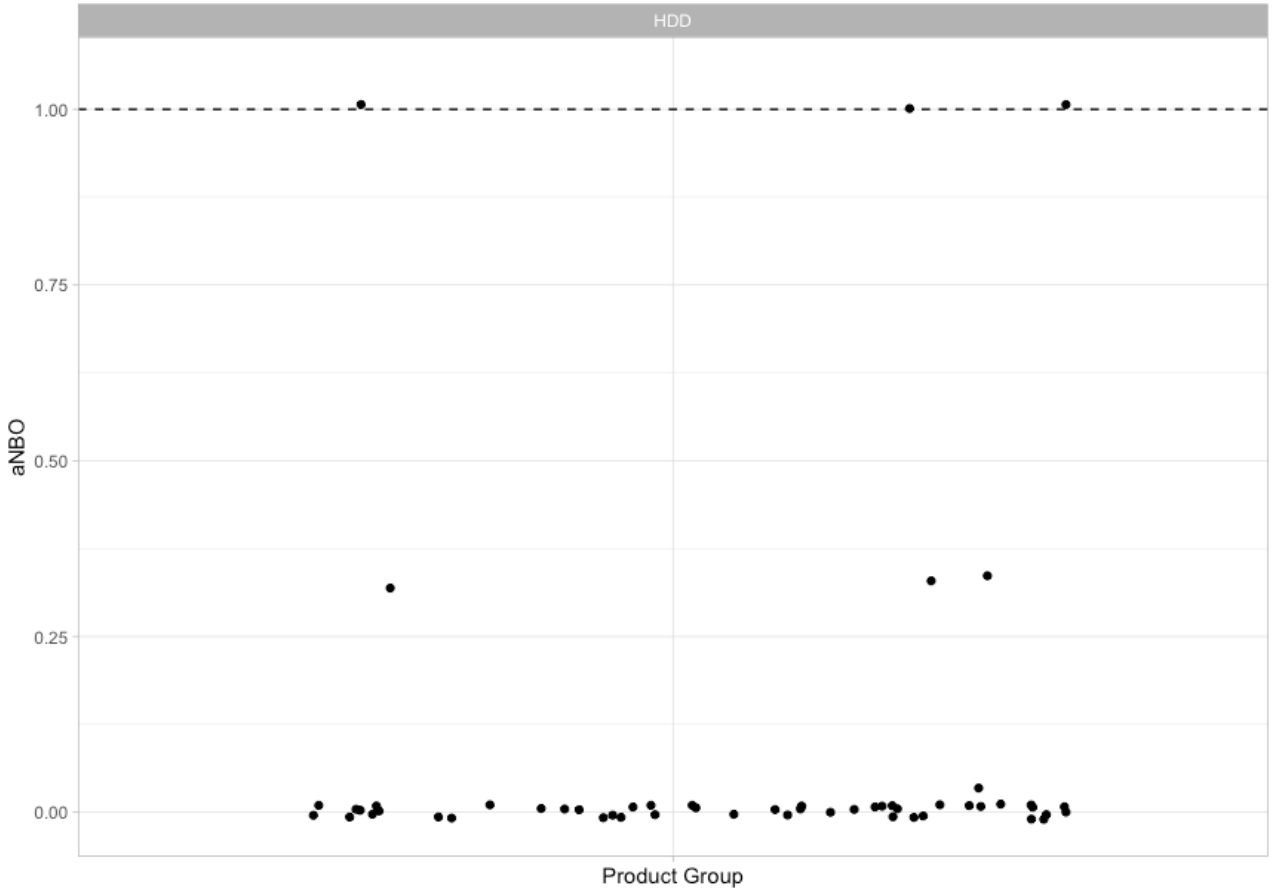


European Commission

6. Biodegradability – Organic compounds (HDD - aNBO)

aNBO (g/l washing water)

Product type	Acronym	Existing	TR1	TR2	Number (n)	Data Analysis	Other ecolabels
Hand-dishwashing detergent	HDD	0.030	0.030	0.010	*59*	0.000	0.020 (BA)

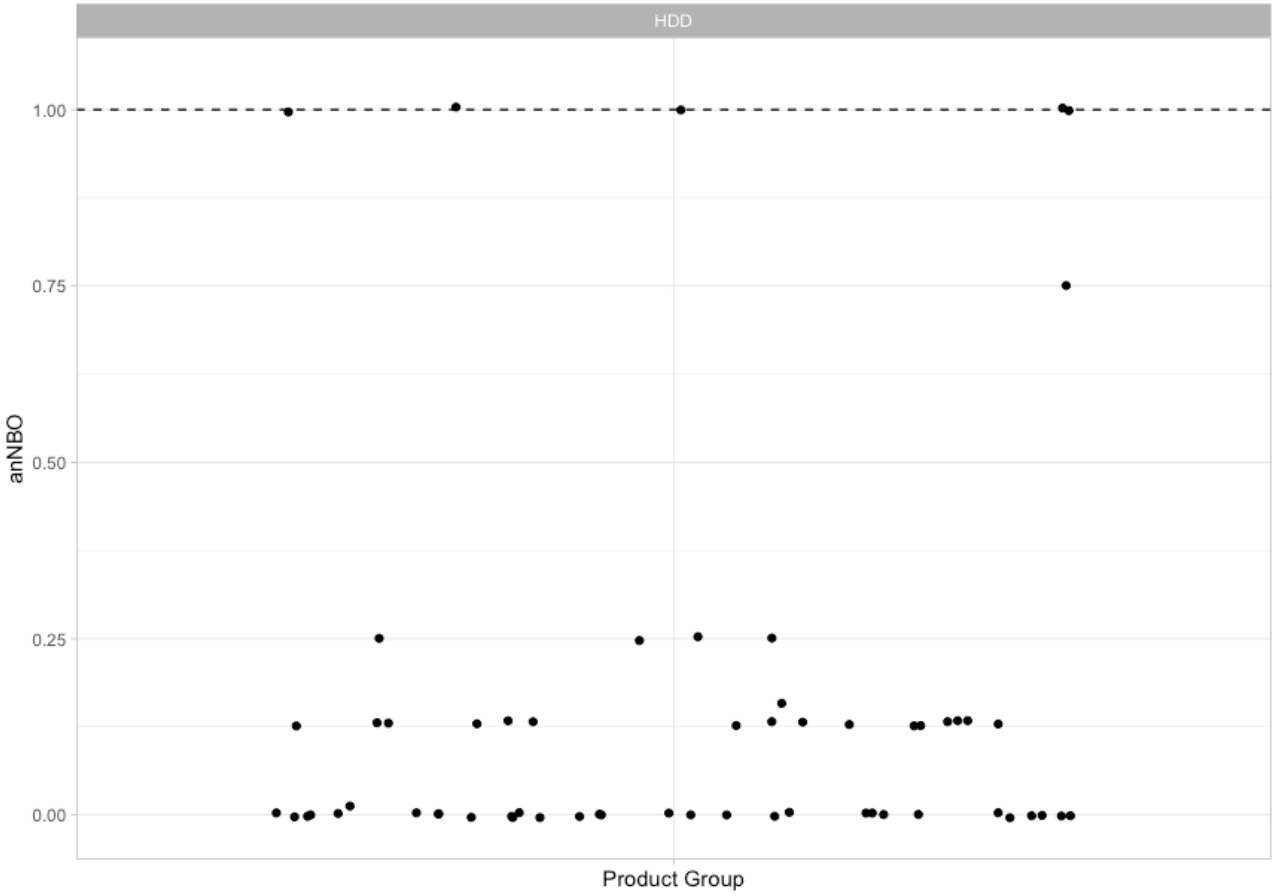


European Commission

6. Biodegradability – Organic compounds (HDD - anNBO)

anNBO (g/l washing water)

Product type	Acronym	Existing	TR1	TR2	Number (n)	Data Analysis	Other ecolabels
Hand-dishwashing detergent	HDD	0.080	0.080	0.020	*59*	0.010	0.020 (BA)



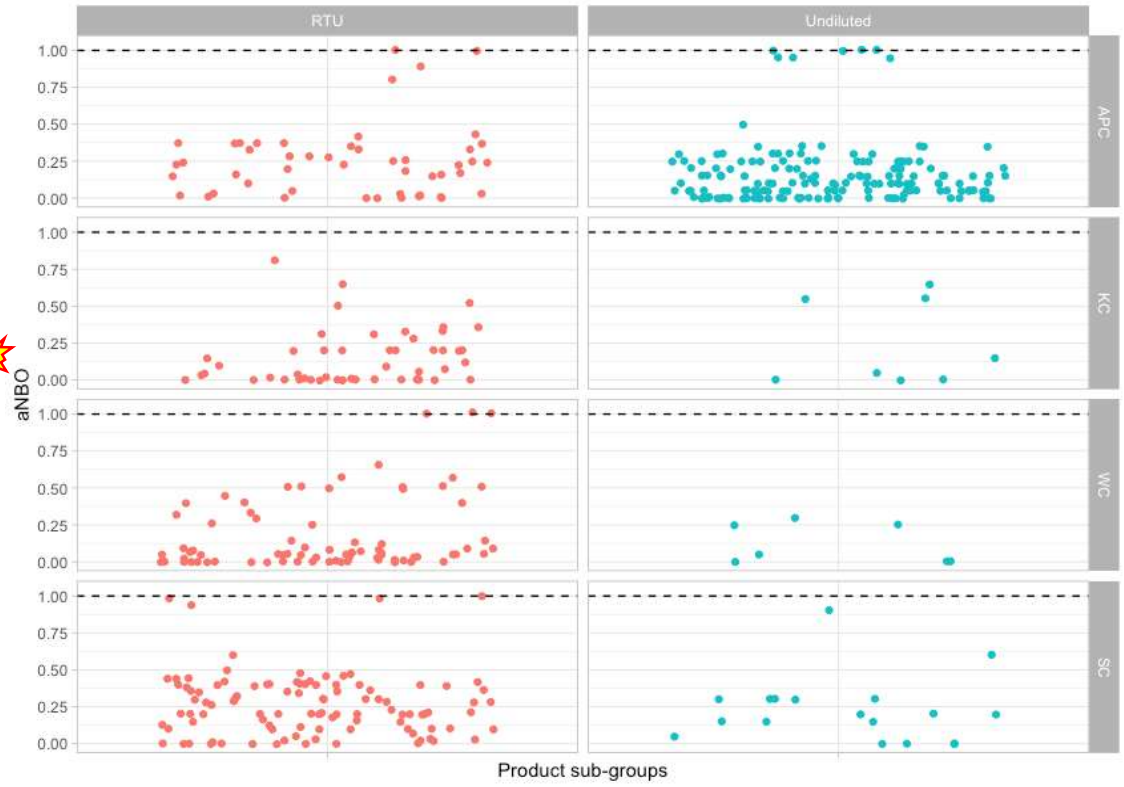
European Commission

6. Biodegradability – Organic compounds (HSC- aNBO)

Product type	Acronym	Concentration	Existing	TR1	TR2	Number (n)	Data Analysis	Other ecolabels
All-purpose cleaners	APC	RTU	3.00	3.00	1.00	*49*	1.05	2.00 (NS)
All-purpose cleaners	APC	Undiluted	0.20	0.20	0.05	*163*	0.04	0.02 (BA) 0.01 – 0.05 (NS)
Kitchen cleaners	KC	RTU	5.00	5.00	1.00	*49*	1.00	0.02 (BA) 2.00 (NS)
Kitchen cleaners	KC	Undiluted	0.20	0.20	0.10	*8*	0.13	0.02 (BA) 0.01 – 0.05 (NS)
Window cleaners	WC	RTU	2.00	2.00	0.70	*105*	0.80	0.20 (BA) 0.70 (NS)
Window cleaners	WC	Undiluted	0.20	0.20	0.10	*18*	0.06	0.20 (BA) 0.10 (NS)
Sanitary cleaners	SC	RTU	5.00	5.00	1.50	*77*	1.45	0.5 – 5.0 (BA) 2.00 (NS)
Sanitary cleaners	SC	Undiluted	0.20	0.20	0.10	*7*	0.06	0.5 – 5.0 (BA) 0.10 – 0.05 (NS)

aNBO
(g/l cleaning solution)

Q29



European Commission

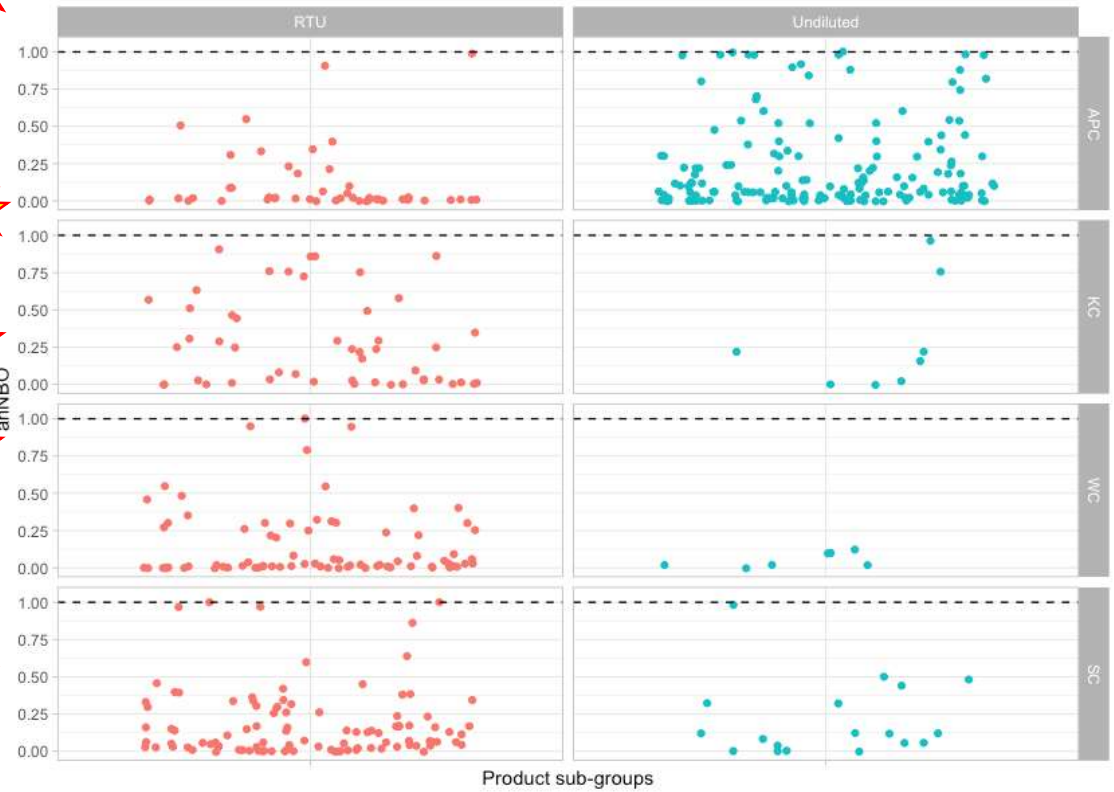
6. Biodegradability – Organic compounds (HSC - anNBO)

Product type	Acronym	Concentration	Existing	TR1	TR2	Number (n)	Data Analysis	Other ecolabels
All-purpose cleaners	APC	RTU	55.00	55.00	*5.00*	*49*	4.95	2.00 – 5.00 (NS)
All-purpose cleaners	APC	Undiluted	0.50	0.50	*0.25*	*163*	0.15	0.02 (BA) 0.10 – 0.25 (NS)
Kitchen cleaners	KC	RTU	35.00	35.00	*5.00*	*49*	17.15	0.50 (BA) 2.00 – 5.00 (NS)
Kitchen cleaners	KC	Undiluted	0.50	0.50	*0.50*	*8*	0.48	0.50 (BA) 0.10 – 0.25 (NS)
Window cleaners	WC	RTU	20.00	20.00	*2.00*	*105*	5.20	0.50 (BA) 0.70 (NS)
Window cleaners	WC	Undiluted	0.50	0.50	*0.50*	*18*	0.16	0.50 (BA) 0.10 – 0.25 (NS)
Sanitary cleaners	SC	RTU	35.00	35.00	*5.00*	*77*	9.10	0.75 – 15.0 (BA) 5.00 (NS)
Sanitary cleaners	SC	Undiluted	0.50	0.50	*0.50*	*7*	0.06	0.75 – 15.0 (BA) 0.10 – 0.25 (NS)

Q29

anNBO

(g/l cleaning solution)



RTU ambition level significantly increased

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6. Biodegradability – Organic compounds (IIDD - aNBO)

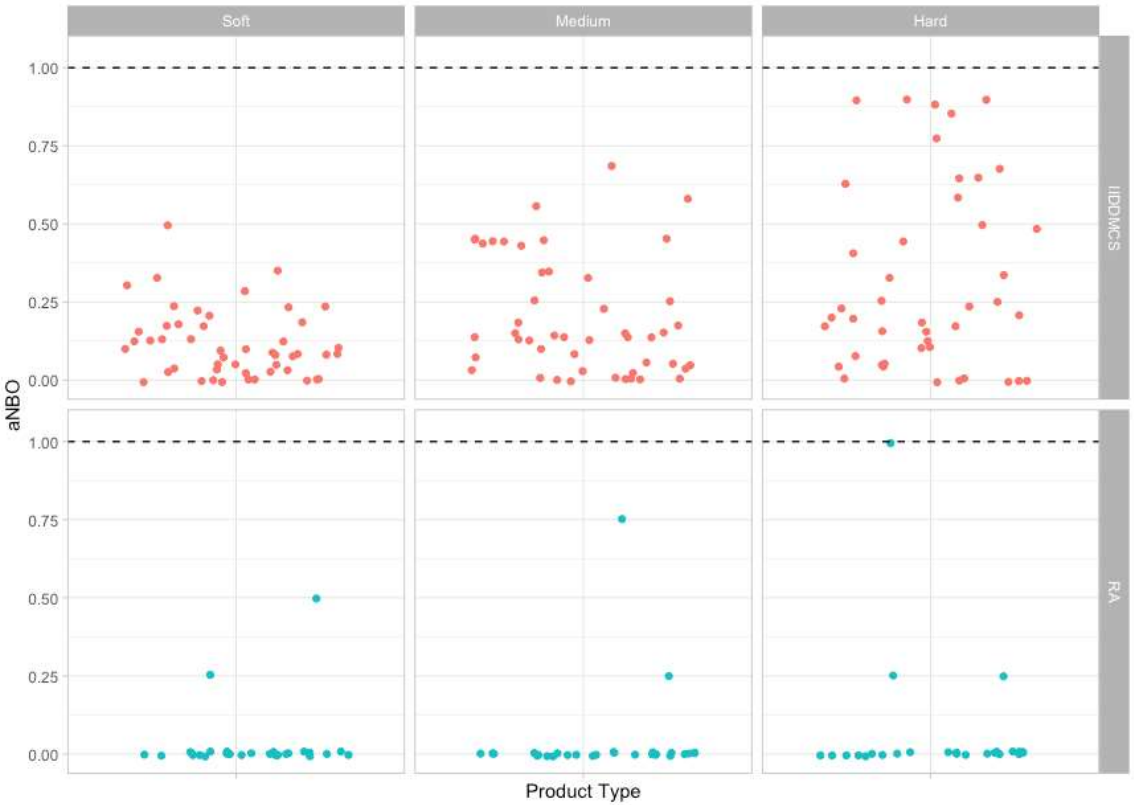
Simplification – proposal irrespective of water hardness

aNBO (g/l washing solution)

Product type	Acronym	Existing	TR1	TR2	Number** (n)	Data Analysis	Other ecolabels
Pre-soaks	PS	0.40*	0.40*	**0.20**	*NA*	NA	0.15 (NS)
Dishwasher detergents/ Multi-component systems	IIDD/ MCS	0.40*	0.40*	**0.20**	*49 (S)* *48 (M)* *44 (H)*	0.07 (S) 0.14 (M) 0.21 (H)	0.15 (NS)
Rinse aids	RA	0.04*	0.04*	**0.04**	*29 (S)* *28 (M)* *26 (H)*	0.00*	0.04 (NS)

***** Same value for all Water hardness levels

** Water hardness levels = Soft – S; Medium – M; Hard – H



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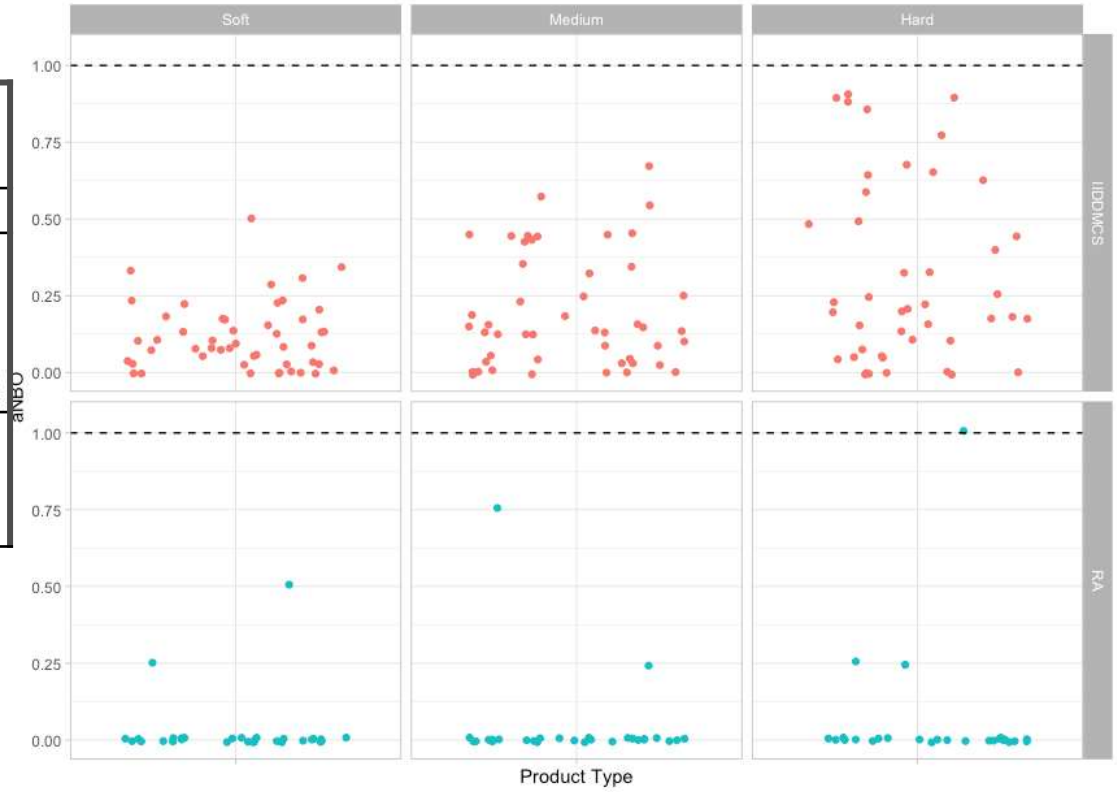
6. Biodegradability – Organic compounds (IIDD - anNBO)

Simplification – proposal irrespective of water hardness

anNBO (g/l washing solution)

Product type	Acronym	Existing	TR1	TR2	Number** (n)	Data Analysis	Other ecolabels
Pre-soaks	PS	0.40*	0.40*	**0.25**	*NA*	NA	0.15 (NS)
Dishwasher detergents/ Multi-component systems	IIDD/ MCS	0.60 (S) 1.00 (M) 1.00 (H)	0.60 (S) 1.00 (M) 1.00 (H)	**0.25**	*49 (S)* *48 (M)* *44 (H)*	0.07 (S) 0.17 (M) 0.24 (H)	0.20 (NS)
Rinse aids	RA	0.04*	0.04*	**0.04**	*29 (S)* *28 (M)* *26 (H)*	0.01 (S) 0.02 (M) 0.03 (H)	0.04 (NS)

* Same value for all Water hardness levels
** Water hardness levels = Soft – S; Medium – M; Hard – H



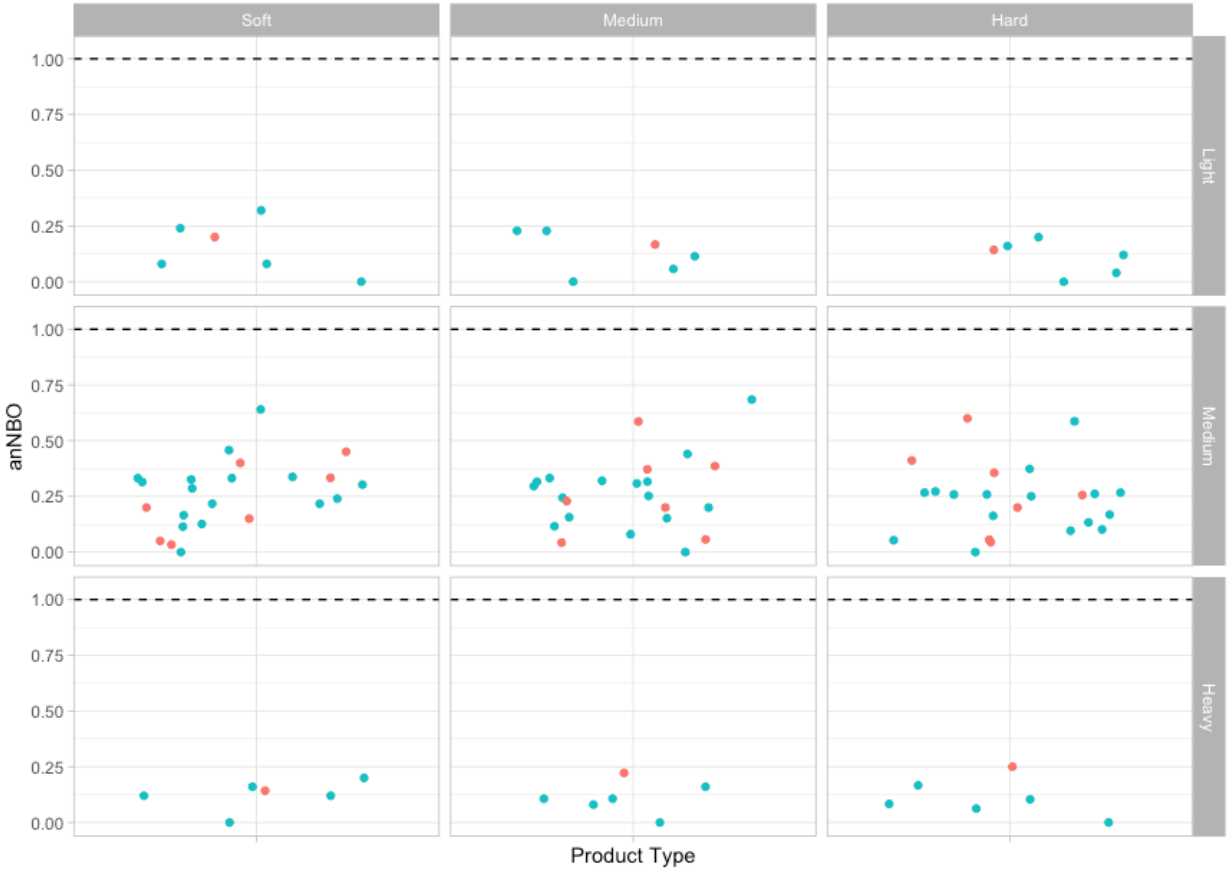
European Commission

6. Biodegradability – Organic compounds (IILD – aNBO)

aNBO (g/kg laundry)

Degree·of·soiling¶ Product·type¤	Light¤	Medium¤	Heavy¤
Powder¤	X.XX¤	X.XX¤	X.XX¤
Liquid¤	0,50¤	0,70¤	0.85¤
Multi-component·system¤	0.60¤	1.00¤	1.40¤

Assumption – if format not specified, then liquid (most stringent limit)



Question 27 (Q27) – For IILD, would you support disregarding the existing categorisation by product form (“*solid*”, “*liquid*”) and instead set a unique limit applicable to both? Note this limit would be set according to the strictest limit, thus corresponding to existing “*liquid*” category.

Water hardness range (factored by medium) ->
Soft (S) - 80%; Medium (M) - 100%; Hard (H) – 120%

Degree of soiling range (factored by medium) ->
Light (L) - 70%; Medium (Me) - 100%; Heavy (He) – 150%

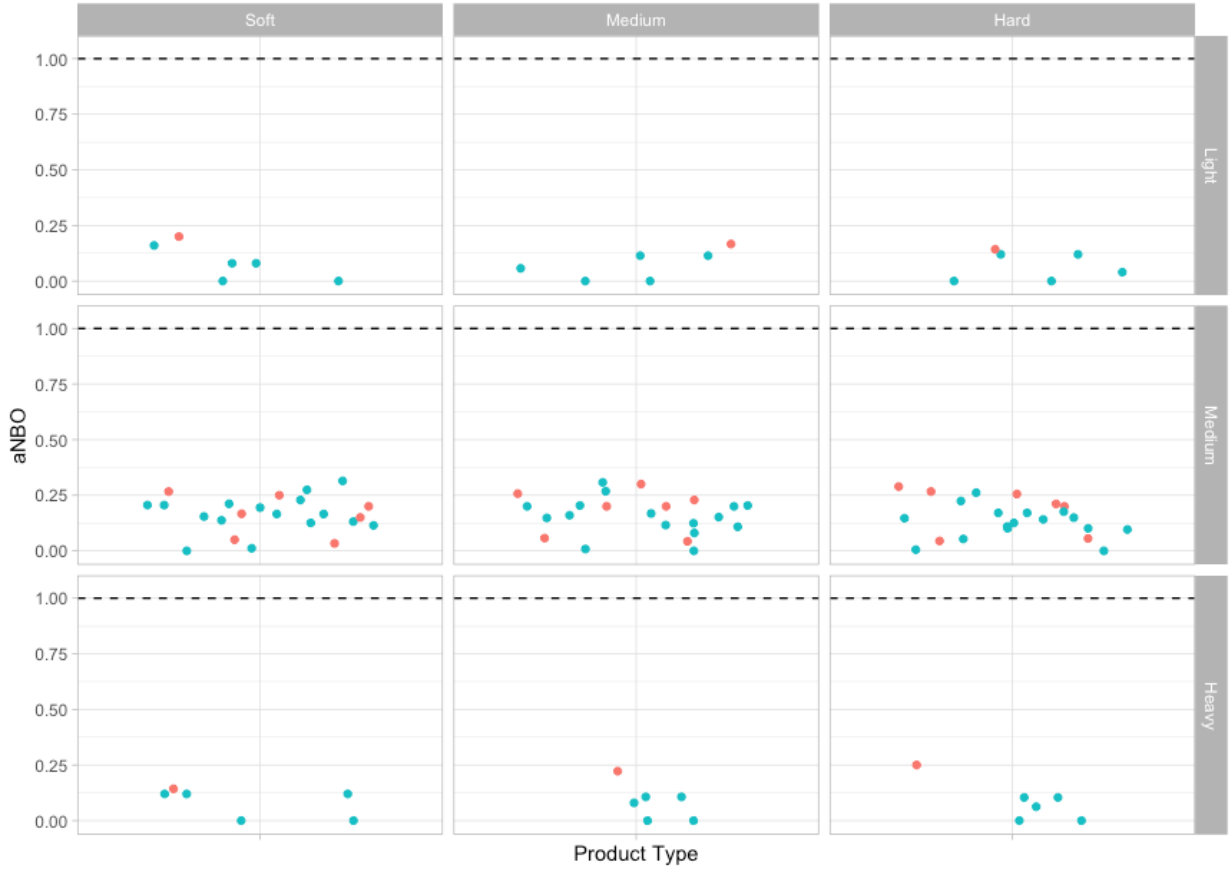
European Commission

6. Biodegradability – Organic compounds (IILD - anNBO)

anNBO (g/kg laundry)

Degree·of·soiling¶ Product·type¤	Light¤	Medium¤	Heavy¤
Powder¤	X.XX¤	X.XX¤	X.XX¤
Liquid¤	0,50¤	0,70¤	0.85¤
Multi-component·system¤	0.60¤	1.00¤	1.40¤

Assumption – if format not specified, then liquid (most stringent limit)



In EUEL existing criteria & NS the threshold within the corresponding combination of water hardness x degree of soiling is the same. Hence, same limits as per aNBO

Question 29 (Q29) – Please, could you share feedback on the feasibility of the aNBO and anNBO thresholds proposed, particularly for HSC and IILD product groups?

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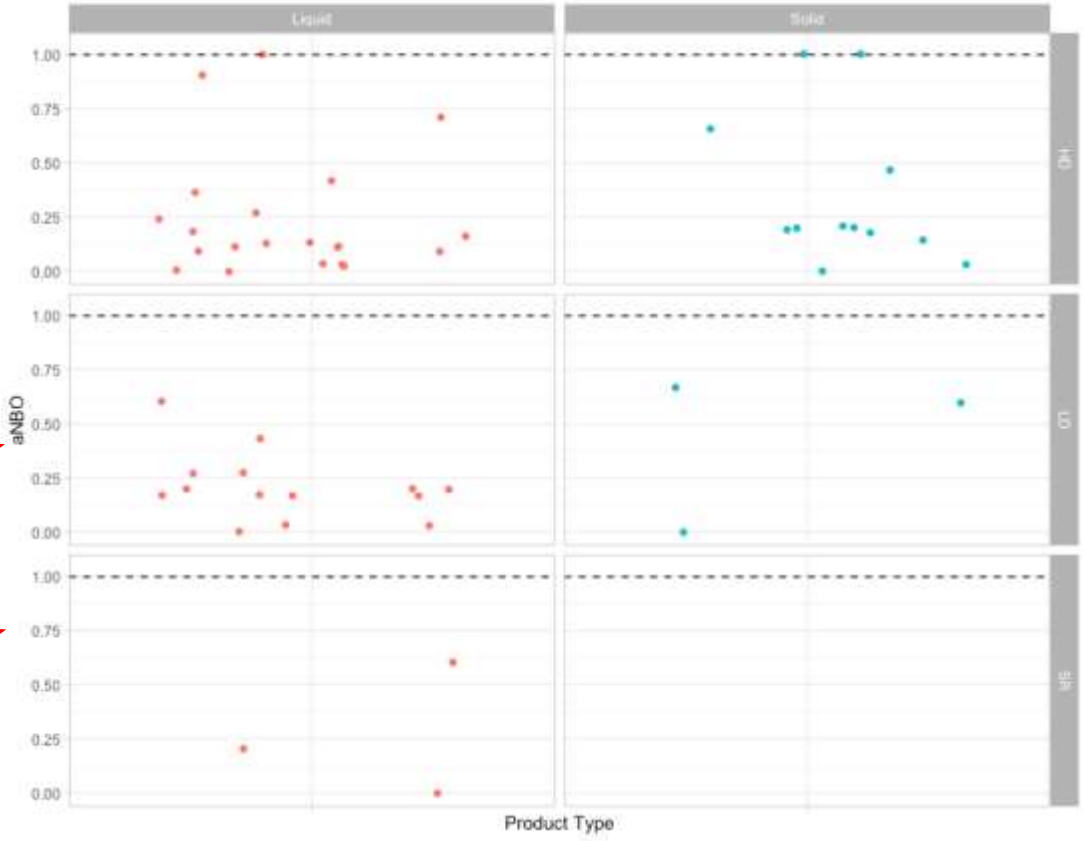
6. Biodegradability – Organic compounds (LD - aNBO)

aNBO (g/kg laundry)

Product type	Acronym	Product form*	Existing	TR1	TR2	Number (n)	Data Analysis	Other ecolabels
Heavy duty detergent	HD	Solid	*1.00*	*1.00*	*0.50*	12	0.52	0.74 (BA) 0.50 (NS)
		Liquid	*0.45*	*0.45*	*0.35*	21	0.12	0.40 (BA) 0.50 (NS)
Light duty detergent	LD	Solid	*0.55*	*0.55*	*0.40*	3	0.37	0.40 (BA) 0.30 (NS)
		Liquid	*0.30*	*0.30*	*0.20*	14	0.08	0.25 (BA) 0.30 (NS)
Stain removers	SR	NA	*0.10*	*0.10*	*0.10*	3	0.06	0.10 (BA & NS)

* Solid = powder/tabs; Liquid = liquid/gel/capsules



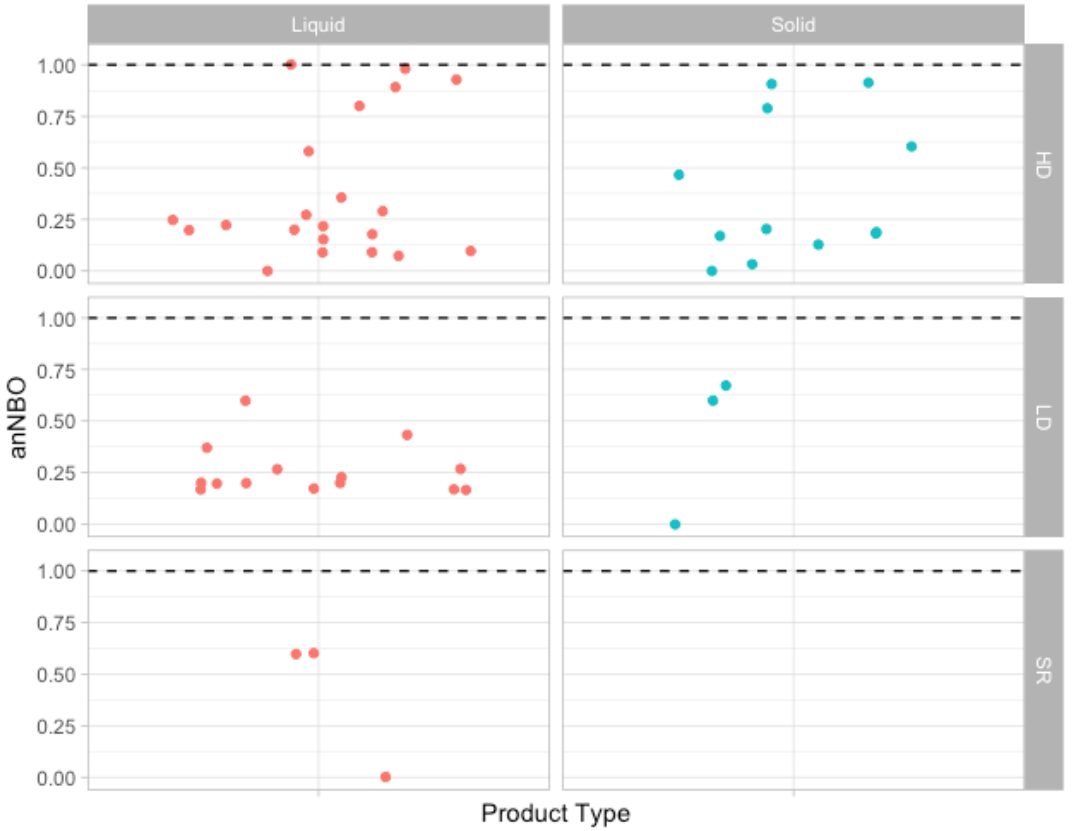
European Commission

6. Biodegradability – Organic compounds (LD - anNBO)

anNBO (g/kg laundry)

Product type	Acronym	Product form*	Existing	TR1	TR2	Number (n)	Data Analysis	Other ecolabels
Heavy duty detergent	HD	Solid	*1.10*	*1.10*	*1.00*	12	0.71	1.00 (BA) 1.00 (NS)
		Liquid	*0.55*	*0.55*	*0.55*	21	0.32	0.55 (BA) 1.00 (NS)
Light duty detergent	LD	Solid	*0.55*	*0.55*	*0.40*	3	0.37	0.40 (BA) 0.30 (NS)
		Liquid	*0.30*	*0.30*	*0.20*	14	0.08	0.25 (BA) 0.30 (NS)
Stain removers	SR	NA	*0.10*	*0.10*	*0.10*	3	0.06	0.10 (BA & NS)

* Solid = powder/tabs; Liquid = liquid/gel/capsules



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6. Biodegradability– Questions recap

Question 26 (Q26) – Do you support test methods ISO 14851:2019 or ISO 14852:2021, inclusive of the requirement on performing a carbon balance and reporting the total degree of biodegradation?

Question 27 (Q27) – For IILD, would you support disregarding the existing categorisation by product form (“*solid*”, “*liquid*”) and instead set a unique limit applicable to both? Note this limit would be set according to the strictest limit, thus corresponding to existing “*liquid*” category.

Question 28 (Q28) – Would you support having exemptions to the requirements on all surfactants to be aerobic and anaerobic biodegradable? If so, which could these be and, especially, under the scope of which product groups? The feedback received stresses that replacing some surfactants for equivalently efficient counterparts would be challenging, especially in particular product groups (IILD)

Question 29 (Q29) – Please, could you share feedback on the feasibility of the aNBO and anNBO thresholds proposed, particularly for HSC and IILD product groups? The data available did not allow in particular cases to draw robust conclusions, thus it is critical to receive further feedback/data to ensure feasibility and proportionality.

Question 30 (Q30) – Do you support the additional condition for an ingoing substance other than a surfactant to be exempted from the anaerobic biodegradability requirement (“*not toxic to aquatic organisms (NOEC/ECx > 0.1 mg/l or LC50/EC50/IC50>10 mg/l*”)

Question 31 (Q31) – Please, share any other comments/suggestions you deem relevant about this criterion providing reasons supporting them.

Questions / Comments?

European Commission

Revision of the EU Ecolabel criteria for
DETERGENT AND CLEANING PRODUCTS

Day 2 (13th) starts 09:00

Room 4A (4th floor)

Thank you !
(& See you tomorrow)

Slide/s 12: Detergent and cleaning products icons, source: e.g. Freepik - Flaticon.com (attribution surang); Safety Helmet, source: e.g. "Designed by rocketpixel / Freepik"

European Commission

Revision of the EU Ecolabel criteria for
DETERGENT AND CLEANING PRODUCTS
12-13th March 2025

WEBEX SESSION

ETIQUETTE FOR VIRTUAL MEETING PARTICIPANTS

- **Please indicate "NAME OF YOUR ORGANIZATION + YOUR FULL NAME"**
- **MUTE YOUR MIC AND SWITCH OFF you CAMERA (unless you have the floor)**
- **USE THE CHAT only to ask for the FLOOR (write "FLOOR" in the chat), and COMMENT only ORALLY**

EU Ecolabel Criteria for Detergents product groups

Laundry Detergents	LD
Industrial & Institutional Laundry detergents	IILD
Dishwasher Detergents	DD
Industrial & Institutional Dishwasher detergents	IIDD
Hand Dishwashing Detergents	HDD
Hard Surface Cleaning Products	HSC

2nd Ad-hoc Working Group Meeting 12th - **13th** March 2025, Hybrid meeting (Brussels + Webex)



The Joint Research Centre (JRC)

Alfonso Jose Lag-Brotons

Maria Grazia La Placa

Paula Perez Lopez

European Commission

1. Opening of virtual room, welcome of participants and introductions

European Commission

Agenda

Day 1: Wednesday 12th March 2025 (Afternoon)

No	Item	SCHEDULE
1.	Opening of virtual room and welcome of participants	14:30 – 14:45
2.	Introduction, political objectives of the EU Ecolabel and process description	14:45 – 14:55
3.	Update of the preliminary background report	14:55 – 15:10
4.	Scope and definitions	15:10 – 15:50
Coffee Break (15 min)		*15:50 - 16:05*
5.	Assessment and verification + Reference dosage + Criterion "Dosage requirements"	16:05 – 16:30
6.	Criterion "Biodegradability"	16:30 – 17:30

European Commission

Agenda

Day 2: Thursday 13th March 2025 (Morning)

No	Item	SCHEDULE
1.	Opening of virtual room and welcome of participants	09:00 – 09:15
2.	Criterion “Toxicity to aquatic organisms”	09:15 – 09:45
3.	Criterion “Restricted substances”	09:45 – 11:00
Coffee Break (15 min)		*11:00 – 11:15*
4.	Criterion “Restricted substances”	11:15 – 12:30
5.	Criterion “Sustainable sourcing”	12:30 – 13:00

European Commission

Agenda

Day 2: Thursday 13th March 2025 (Afternoon)

No	Item	SCHEDULE
7.	Criterion “Fitness for use”	14:30 – 15:40
8.	Criterion “Packaging”	15:40 – 16:15
Coffee Break (15 min)		*16:15 – 16:30*
9.	Criterion “Packaging”	16:30 – 17:05
10.	Criteria “Automatic dosing systems” + "User information" + "Information on EU Ecolabel"	17:05 – 17:25
11.	Conclusions, next steps and closure of the meeting	17:25 – 17:30

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2. Toxicity to aquatic organisms

2. Criterion – Toxicity to aquatic organisms

Product toxicity represented by the *Critical Dilution Volume* (***CDV***)
Amount of water required to dilute below harmful impact**.**

ALL	$$CDV_{chronic} = \sum CDV(i) = 1000 \cdot \sum dosage(i) \cdot \frac{DF(i)}{TF_{chronic}(i)}$$ Where: $dosage(i)$: weight (g) of the substance (i) in the reference dose; $DF(i)$: degradation factor for the substance (i); $TF_{chronic}(i)$: chronic toxicity factor for the substance (i);

- (Bio)degradability & Aquatic toxicity as key variables
- Based on Degradation (**DF**) and Toxicity (**TF**) factors (Chronic or Acute) of substances used.
- The Detergent Ingredient Database (DID) list as main database to source data for CDV calculation

2. Criterion – Toxicity to aquatic organisms

Thresholds revised (generally stricter) in the light of new evidences and….

Main streams of evidences:

- Focused questionnaire (**JRC data analysis**)
- Stakeholders feedback (TR1)
- Other ecolabels (NS, BA)

Methodological remarks in Annex 1 & rationales, as:

- Qualitative & quantitative inputs (**CDV**, aNBO, anNBO, elemental P, VOCs, WUR).
- Inputs = 10% total EUEL products (2024); By PG 6 – 12%; highest for HSC.
- Data entry = **unique combination of formula + packaging** (worst WUR).
- Data quality checks/curation – can result in dropping data (45% on average).
- Data factored by existing EUEL threshold (**range 0 – 1**) in plots.
- Descriptive statistics – generally **3rd quartile** as reference; **MAX if few data**.
- Assumptions – required when data lacked required metadata (format)
- Limitations
  - Limited data in particular product groups (i.e. HSC – KC & WC)
  - Lack of granularity – *to which (sub-)categorization does it belong?*
  - Limited full formulation access versus data inputs received for particular traits (eg. CDV, anNBO/anNBO)

Question 20 (Q20) –*Please, provide reasoned comments on the feasibility of the proposed CDV threshold for the different product groups. Due to comparatively low data entries and/or need for further evidences, the JRC especially welcomes comments on the following EUEL (sub-) groups:* HSC (KC – undiluted; WC – undiluted); LD (Stain remover); DD (Rinse aid); IIDD (Pre-soaks);

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2. Criterion – Toxicity to aquatic organisms

…**steps** towards **simplification** taken…

… via specific **proposals** (i.e. merging product (sub-) categories…

… and/or **matching** thresholds.

	Water hardness / Product type	Soft (< 1,5 mmol $CaCO_3$/l) (l/l of washing solution)	Medium (1,5-2,5 mmol $CaCO_3$/l) (l/l of washing solution)	Hard (>2,5 mmol $CaCO_3$/l) (l/l of washing solution)
IIDD	Pre-soaks	~~1800~~ 2 000	~~1800~~ 2 000	~~1800~~ 2 000
	Dishwasher detergents / Multi-component systems	1000	1250	1500
	~~Dishwasher detergents~~	~~1800~~	3000	4200
	~~Multi-component systems~~	~~1800~~	2400	3000
	Rinse-aids	~~2000~~ 3 000	~~2500~~ 3 000	~~2750~~ 3 000

Question 19 (Q19) *–Would you support setting the same CDV thresholds for HSC undiluted and RTU, meaning newly proposed limits for RTU would be used as reference for both?* [...]

Question 21 (Q21) *–Do you support the proposed simplification of the IIDD CDV thresholds (merging dishwasher detergent with multi-component systems? In addition, do you support a simplification by setting thresholds regardless of water hardness (See below)?* [...] *Pre-soaks* = 1250; *Dishwasher detergents / Multi-component systems* = 1500; *Rinse aids* = 2750.

Question 22 (Q22) *–Would you support a simplification of the IIDD CDV thresholds by having a unique threshold for dishwasher detergents (DD) and multi-component systems (MCS)?*

Question 23 (Q23) *–Would you support a simplification of the IILD CDV thresholds by setting threshold irrespective of product form (by merging "powder" and "liquid")?* [...]

Question 24 (Q24) *–Further to Q23, would you support a simplification of the IILD CDV thresholds by setting them regardless of water hardness, thus solely based on degree of soiling?* [...] Consequently, the proposal once simplified regardless water hardness, irrespective of IILD product form (*solid/liquid)* and presented by degree of soiling (in the order *light/medium/heavy)* would be [units are "*l/kg laundry*"]: *IILD* = 31500/45000/58500; *Multi-component systems* = 36750/52500/68250.

[...] – question text shortened

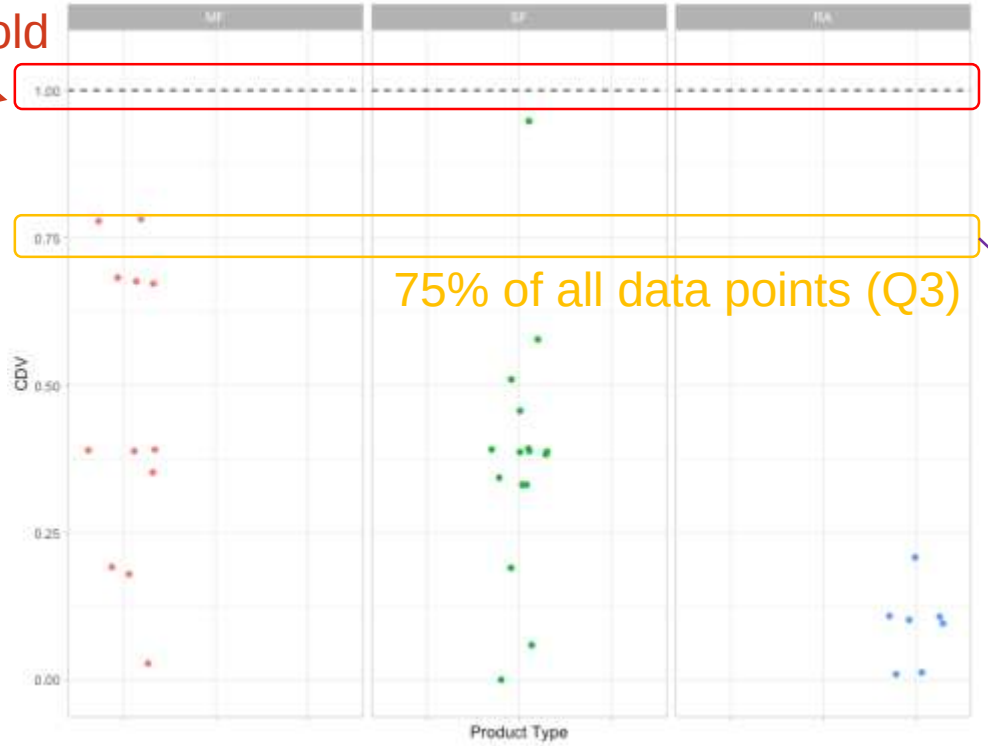
European Commission

2. Toxicity to aquatic organisms – DD

CDV (l/wash)

Product type	Acronym	Existing	TR1	TR2	Number (n)	Data Analysis	Other ecolabels	Stakeholders
Dishwasher detergents (Single function)	SF	22500	20000	17500	16	15300	20000 (BA) 25500 (NS)	16000
Dishwasher detergents (Multi function)	MF	27000	24000	22000	12	11003	24000 (BA) 22500 (NS)	22000 25000
Rinse aids	RA	7500	1500	2500	7	1575	5000 (BA & NS)	2000

EUEL criteria existing threshold (*Maximum value*)



75% of all data points (Q3)

Feedback welcomed, since…

…considerable threshold change & few data points

ERROR – in PTT

See corrected slide (next one)

European Commission

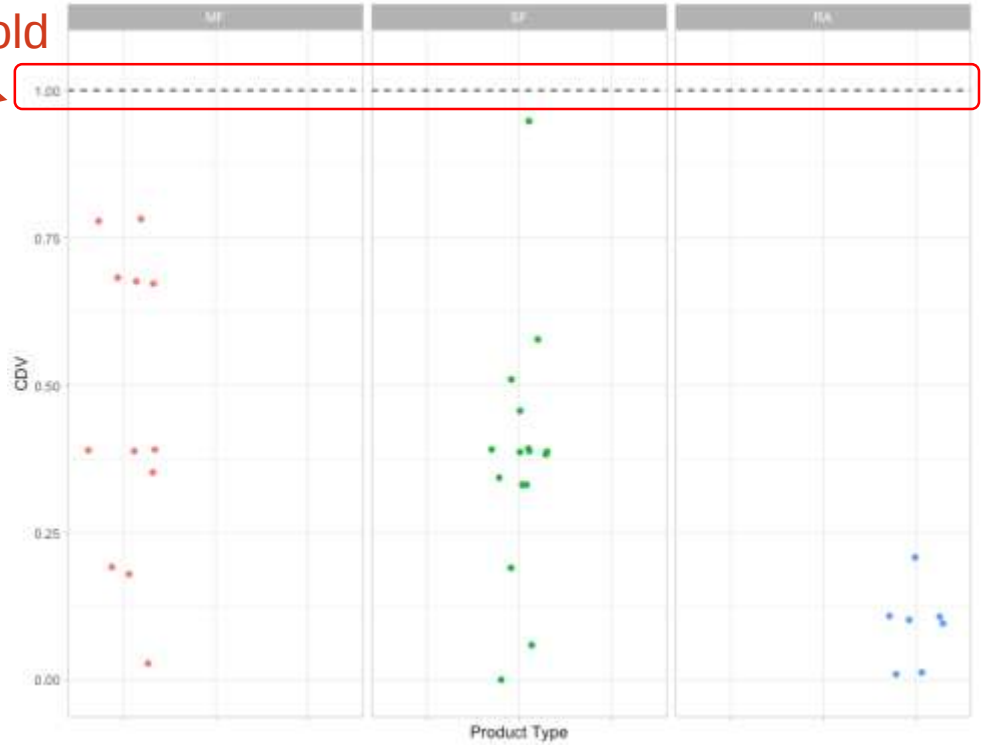
CORRECTED SLIDE (See previous)

2. Toxicity to aquatic organisms – DD

CDV (l/wash)

Product type	Acronym	Existing	TR1	TR2	Number (n)	Data Analysis	Other ecolabels	Stakeholders
Dishwasher detergents (Single function)	SF	22500	20000	17500	16	15300	20000 (BA) 25500 (NS)	16000
Dishwasher detergents (Multi function)	MF	27000	24000	22000	12	11003	24000 (BA) 22500 (NS)	22000 25000
Rinse aids	RA	7500	1500	2500	7	1575	5000 (BA & NS)	2000

EUEL criteria existing threshold (*Maximum value*)



Feedback welcomed, since…

…considerable threshold change & few data points

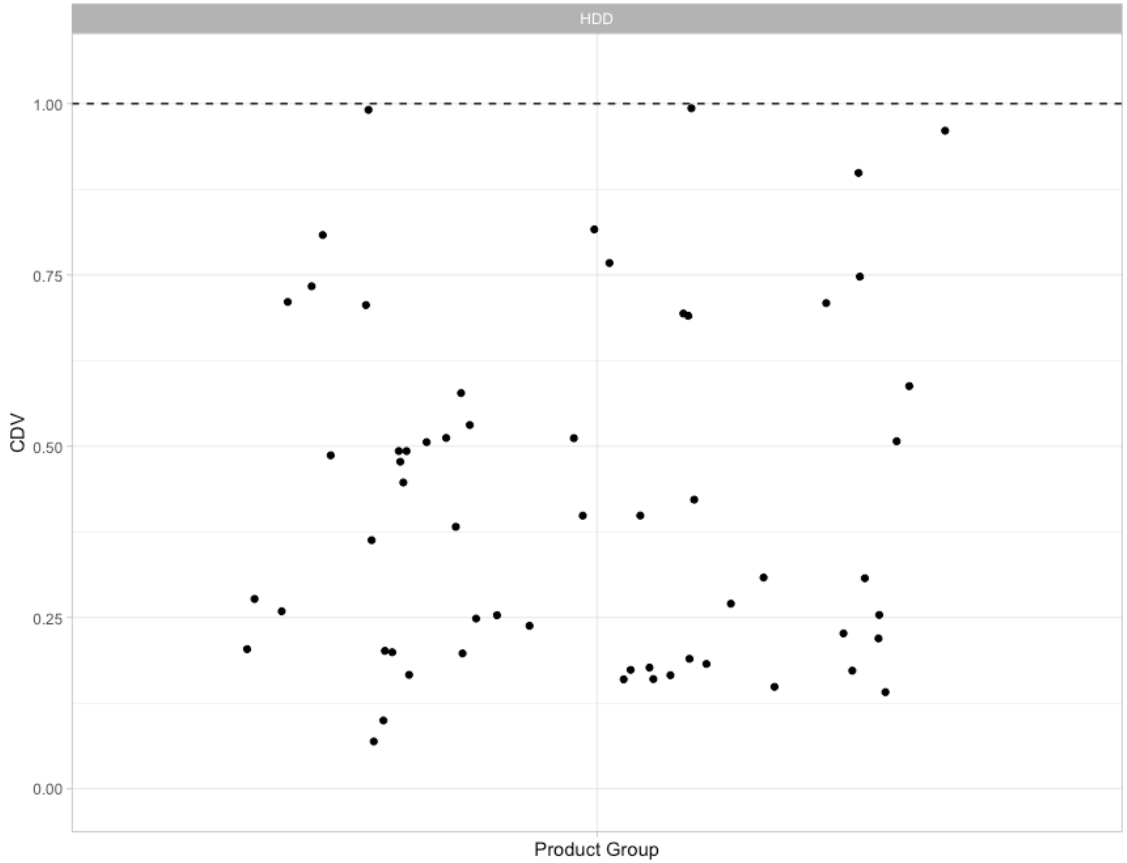
75% of all data points (Q3)

European Commission

2. Toxicity to aquatic organisms – HDD

CDV (l/l washing water)

Product type	Acronym	Existing	TR1	TR2	Number (n)	Data Analysis	Other ecolabels	Stakeholders
Hand-dishwashing detergent	HDD	2500	1500	1500	*59*	1463	2000 (BA) 1500 (NS)	1250 520

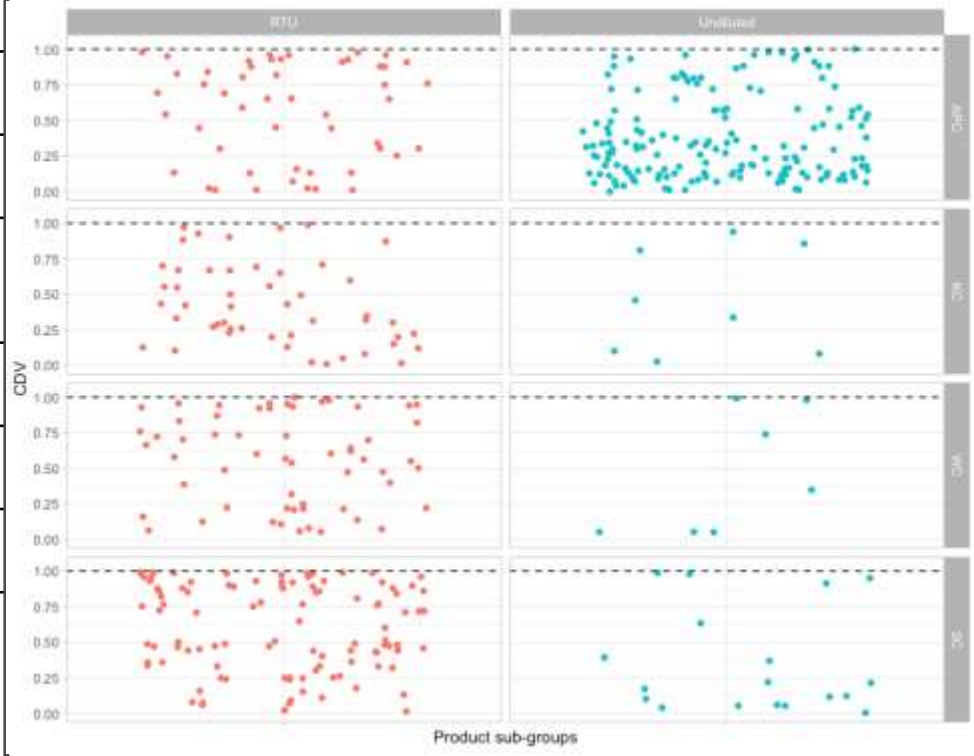


European Commission

2. Toxicity to aquatic organisms – HSC

Product type	Acronym	Concentration	Existing	TR1	TR2	Number (n)	Data Analysis	Other ecolabels	Stakeholders
All-purpose cleaners	APC	RTU	*350000*	*350000*	*250000*	50	308000	600000 (NS-C) 350000 (NS – P)	250000
All-purpose cleaners	APC	Undiluted	*18000*	*18000*	*13000*	163	10260	10000 (BA) *	13000
Kitchen cleaners	KC	RTU	*600000*	*600000*	*400000*	49	402000	300000 (BA) 600000 (NS-C) 350000 (NS – P)	250000
Kitchen cleaners	KC	Undiluted	*45000*	*45000*	*37000*	8	42300	300000 (BA) *	💥
Window cleaners	WC	RTU	*48000*	*48000*	*41000*	58	41280	48000 (BA; NS – C & P)	35000
Window cleaners	WC	Undiluted	*18000*	*18000*	*15000*	7	17820	48000 (BA) *	💥
Sanitary cleaners	SC	RTU	*600000*	*600000*	*350000*	104	529500	150000 – 300000 (BA) 600000 (NS-C) 350000 (NS – P	290000 375000
Sanitary cleaners	SC	Undiluted	*45000*	*45000*	*25000*	18	25650	150000 – 300000 (BA) *	20000

CDV (I/I cleaning solution)



* 10500 (NS –C),
9500 (NS – P)

💥 Feedback on feasibility welcomed

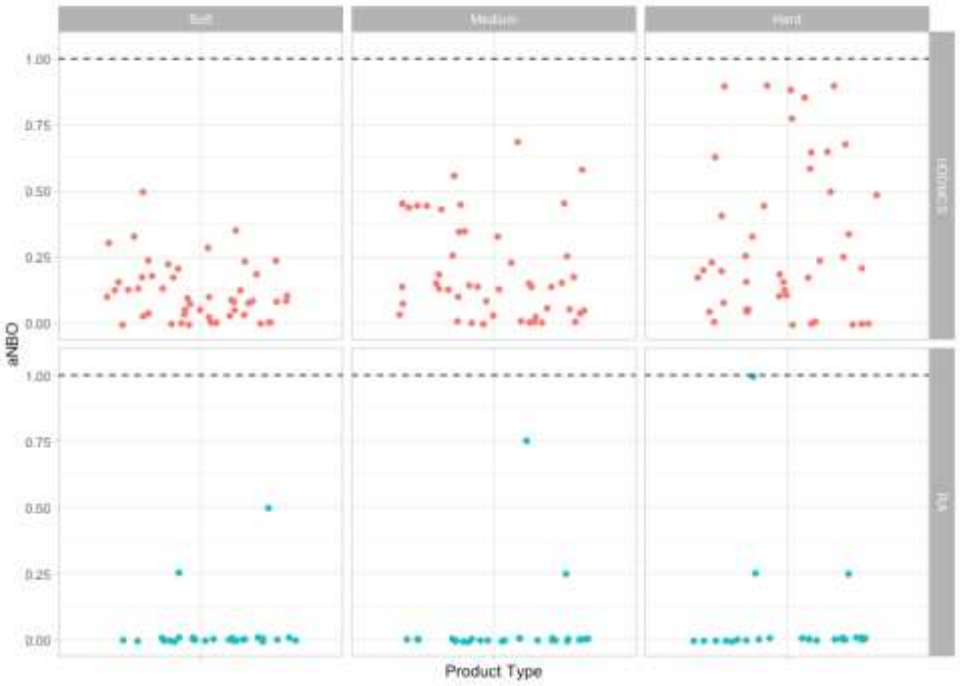
European Commission

2. Toxicity to aquatic organisms – IIDD

Product type	Acronym	Existing	TR1	TR2	Number (n)	Data Analysis	Other ecolabels	Stakeholders
Pre-soaks	PS	2000*	2000*	1800*	*NA*	NA	1800 (NS)	NA
Dishwasher detergents / Multi-component systems	IIDD/ MCS	3000 (S)** 4000 (M)** 5000 (H)**	1800 (S) 3000 (M) 4200 (H) / 1800 (S) 2400 (M) 3000 (H)	1000 (S) 1250 (M) 1500 (H)	*38 (S)* *37 (M)* *35 (H)* / *12 (S)* *12 (M)* *10 (H)*	237 (S) 460 (M) 643 (H) / 179 (S) 462 (M) 874 (H)	1800 (NS)	1000 (S) 1250 (M) 1500 (H)
Rinse aids	RA	3000*	3000	2000 (S) 2500 (M) 2750 (H)	*29 (S)* *28 (M)* *26 (H)*	419 (S) 717 (M) 1275 (H)	3000 (NS)	2000 (S) 2500 (M) 2750 (H)

CDV

(l/l washing solution)



* Same value for all Water hardness levels (Soft – S; Medium – M; Hard – H)

** Same value for IIDD and MCS

Merged (IIDD + MCS) threshold !

Question 21 (Q21) –*Do you support the proposed simplification of the IIDD CDV thresholds (merging dishwasher detergent with multi-component systems? In addition, do you support a simplification by setting thresholds regardless of water hardness (See below)?* [...] *Pre-soaks* = ~~1250~~ 1800; *Dishwasher detergents / Multi-component systems* = 1500; *Rinse aids* = 2750.

Error! – in TR2

European Commission

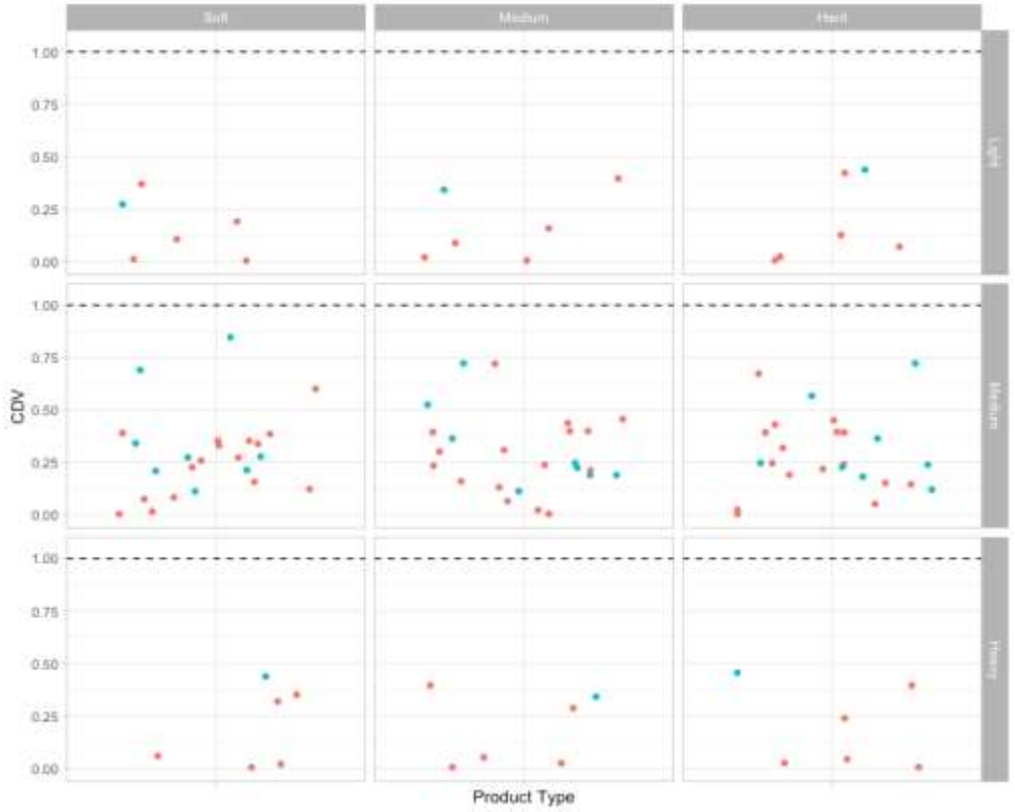
2. Toxicity to aquatic organisms – IILD

CDV (l/kg laundry)

Soft water (<1,5 mmol $CaCO_3$/l) (l/kg of laundry)			
Degree of soiling / Product type	**Light**	**Medium**	**Heavy**
Powder	22500	30000	37500
Liquid	XXXX ~~37500~~	XXXX ~~45000~~	XXXX ~~52500~~
Multi-component system	37500	52500	68250 ~~90 000~~

Feedback on feasibility welcomed!
(low data entries; largely as TR1)

Assumption – if format not specified, then powder (solid) as most stringent limit.



Question 23 (Q23) –*Would you support a simplification of the IILD CDV thresholds by setting threshold irrespective of product form (by merging "powder" and "liquid")?* [...]

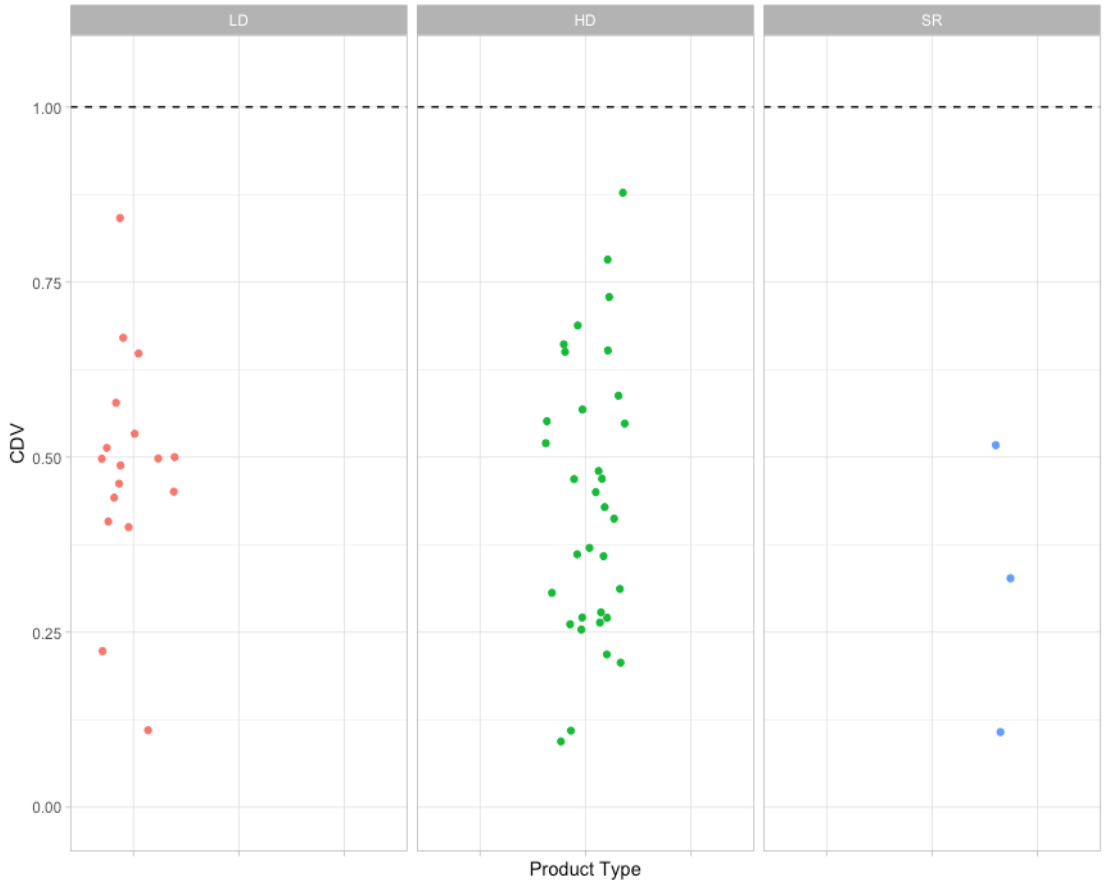
Question 24 (Q24) –*Further to Q23, would you support a simplification of the IILD CDV thresholds by setting them regardless of water hardness, thus solely based on degree of soiling?* [...] Consequently, the proposal once simplified regardless water hardness, irrespective of IILD product form (*solid/liquid)* and presented by degree of soiling (in the order *light/medium/heavy)* would be [units are "*l/kg laundry*"]: *IILD* = 31500/45000/58500; *Multi-component systems* = 36750/52500/68250.

European Commission

2. Toxicity to aquatic organisms – LD

CDV (l/kg laundry)

Product type	Acronym	Existing	TR1	TR2	Number (n)	Data Analysis	Other ecolabels	Stakeholders
Heavy duty detergent	HD	*20000*	*15000*	*15000*	17	10600	15000 (BA) 18000 (NS)	
Light duty detergent	LD	*31500*	*23625*	*20000*	33	17955	31500 (BA) 25000 (NS)	20000
Stain removers	SR	*3500*	*3500*	*2500*	3	1820	3500 (BA & NS)	2800



Feedback on feasibility welcomed

European Commission

2. Toxicity to aquatic organisms – Questions recap

Question 18 (Q18) –*Would you support excluding APC RTU from the scope of EUEL HSC?* [...] Alignment with BA ; Data analysis shown ratio 1:3 for APC in RTU:Undiluted forms

Question 19 (Q19) –*Would you support setting the same CDV thresholds for HSC undiluted and RTU, meaning newly proposed limits for RTU would be used as reference for both?* [...] BA does not differentiate; RTU as reference; IF wide reasoned support.

Question 20 (Q20) –*Please, provide reasoned comments on the feasibility of the proposed CDV threshold for the different product groups. Due to comparatively low data entries and/or need for further evidences, the JRC especially welcomes comments on the following EUEL (sub-) groups:* HSC (KC – undiluted; WC – undiluted); LD (Stain remover); DD (Rinse aid); IIDD (Pre-soaks);

Question 21 (Q21) –*Do you support the proposed simplification of the IIDD CDV thresholds (merging dishwasher detergent with multi-component systems? In addition, do you support a simplification by setting thresholds regardless of water hardness (See below)?* [...] *Pre-soaks* = 1250; *Dishwasher detergents / Multi-component systems* = 1500; *Rinse aids* = 2750.

Question 22 (Q22) –*Would you support a simplification of the IIDD CDV thresholds by having a unique threshold for dishwasher detergents (DD) and multi-component systems (MCS)?*

Question 23 (Q23) –*Would you support a simplification of the IILD CDV thresholds by setting threshold irrespective of product form (by merging "powder" and "liquid")?* [...]

Question 24 (Q24) –*Further to Q23, would you support a simplification of the IILD CDV thresholds by setting them regardless of water hardness, thus solely based on degree of soiling?* [...] Consequently, the proposal once simplified regardless water hardness, irrespective of IILD product form (*solid/liquid)* and presented by degree of soiling (in the order *light/medium/heavy)* would be [units are "*l/kg laundry*"]: *IILD* = 31500/45000/58500; *Multi-component systems* = 36750/52500/68250. Values based on JRC analysis & stakeholders feedback. Calculation targeted the average value for medium water hardness & degree of soiling to then extrapolating it other degree of soiling (light – heavy) considering 0.7 – 1.3 ratios.

[...] – question text shortened

3. Criterion “Excluded and Restricted substances” [Part 1 of 2; targeting sub-criterions Specified excluded and restricted substances]

European Commission

3. Criterion Excluded and Restricted substances

Sub-criteria:
(a) Specified excluded and restricted substances
(b) Hazardous substances
(c) Substances of very high concern (SVHCs)
(d) Fragrances
(e) Preservatives
(f) Colouring agents
(g) Enzymes
(h) (Only for HDD) Corrosive properties
(h) Micro-organisms

(i) Excluded substances
(ii) Restricted substances

- Isothiazolinones
- Total phosphorus (P) content
- Volatile organic compounds (VOCs)

3. Criterion Excluded and Restricted substances

Linked with **Article 6(6) and 6(7) of the EU Ecolabel Regulation (EC) No 66/2010**

The EU Ecolabel may not be awarded to goods containing substances or mixtures meeting the criteria for classification as

- **toxic**,
- **hazardous to the environment**,
- **carcinogenic, mutagenic or toxic for reproduction (CMR)**, in accordance with CLP

nor to goods containing **substances referred to in Article 57 of Regulation (EC) No 1907/2006** of REACH.

The Regulation allows **derogations** of specific substances under strictly defined conditions:

"(…) only in the event that it is not technically feasible to substitute them as such, or via the use of alternative materials or designs, or in the case of products which have a significantly higher overall environment performance compared with other goods of the same category, the Commission may adopt measures to grant derogations".

"**No derogation** shall be given concerning substances that **meet the criteria of Article 57 of Regulation (EC) No 1907/2006** and that are identified **according to the procedure described in Article 59(1) of that Regulation**, present in mixtures, in an article or in any homogeneous part of a complex article **in concentrations higher than 0,1 %** (weight by weight)".

European Commission

3. Criterion Excluded and Restricted substances
a(i) - Excluded substances

Changes overview:

- Criterion wording has been modified
- CAS numbers have been added for accuracy
- EU Taxonomy alignment has been introduced
- Exclusion of CMIT/MIT alongside MIT
- Reference to official list of EDs
- Removal of exclusion for alkylphosphonic acid derivatives, and their respective salts

TR2 Proposed sub-criterion (a) specified excluded and restricted substances

(i) Excluded substances

ALL	The substances indicated below shall not be included as ingoing substances in the final product or as ingoing substances to the ingredients used to make the final product: ~~regardless of concentration, neither as part of the formulation, as part of any mixture included in the formulation, nor as impurities:~~ — Substances listed in Annexes I or II to Regulation (EU) 2019/1021 on persistent organic pollutants; — Mercury and mercury compounds as defined in Article 2 of Regulation (EU) 2017/852 on Mercury; — Substances listed in Annexes I or II to Regulation (EC) No 1005/2009 on ozone layer depleting substances; — Substances listed in Annex XVII to Regulation (EC) No 1907/2006, unless in full compliance with the relevant conditions specified in that Annex and only if also explicitly permitted for use in criterion *Excluded and Restricted substances* in its sub-criterion *Hazardous substances* and compliant with associated derogation conditions; — Alkylphenols, Aalkyl phenol ethoxylates (APEOs) and their ~~other alkyl phenol~~ derivatives, as referred to in entry 43 to Annex XIV or entry 46 to Annex XVII of Regulation (EC) 1907/2006; — Atranol (CAS No 526-37-4); — Chloroatranol (CAS No 57074-21-2); — Diethylenetriaminepentaacetic acid (DTPA, CAS No 67-43-6); — Ethylenediaminetetraacetic acid (EDTA) and its salts (EDTA, CAS Nos: 60-00-4, 64-02-8, 15708-41-5, 21265-50-9 etc.); — Formaldehyde and its preservatives that are formaldehyde releasers, such as: ○ (e.g. 2-bromo-2-nitropropane-1,3-diol (Bronopol, CAS No 52-51-7); ○ 5-bromo-5-nitro-1,3-dioxane (Bronidox, CAS No 30007-47-7); ○ sodium hydroxyl methyl glycinate (CAS No 70161-44-3); ○ diazolidinylurea) (CAS No 78491-02-8); ○ DMDM-Hydantoin (CAS No 6440-58-0); ○ Quaternium-15 (CAS No 4080-31-3), and ○ Tetramethylolglycoluril (CAS No 5395-50-6). ~~with 4~~The only exception to this restriction shall be for ~~of~~ impurities of formaldehyde in surfactants based on polyalkoxy chemistry up to a concentration of 0,010 % weight by weight in the supplied surfactant ~~ingoing substance~~; — Glutaraldehyde (CAS No 111-30-8); — Hydroxyisohexyl 3-cyclohexene carboxaldehyde (HICC, CAS No 31906-04-4); — Methylisothiazolinone (MIT, CAS No 2682-20-4); — 5-chloro-2-methyl-4-isothiazolin-3-one/2-methyl-4-isothiazolin-3-one (CMIT/MIT, CAS No 55965-84-9); — Microplastics (Synthetic Polymer Microparticles); — Nanomaterials; — Nitromusks and polycyclic musks; — Organic chlorine compounds and hypochlorites; — Per- and polyfluoroalkyl substances (PFAS); — Quaternary ammonium salts which are not readily biodegradable and/or classified with any of the hazards listed in Article 57 to Regulation (EC) 1907/2006; — Reactive chlorine compounds; — Rhodamine B; — ~~Substances identified to have endocrine disrupting properties;~~ — Substances classified as ~~considered to be~~ potential category 1 or category 2 endocrine disruptors for human health or the environment in accordance with CLP Regulation (EC) 1272/2008, substances included in the candidate list referred to in Article 59(1) of REACH Regulation (EC) 1907/2006 as having endocrine-disrupting properties for human health or the environment, substances identified as having endocrine-disrupting properties in accordance with Regulation (EU) No 528/2012 or Regulation (EC) No 1107/2009~~in category 1 or 2 on the EU's priority list of substances that are to be investigated further for endocrine disruptive effects~~; — Triclosan (CAS No 3380-34-5); — 3-iodo-2-propynyl butylcarbamate (IPBC, CAS No 55406-53-6).
DD, HDD, HSC, LD	— Phosphates, — ~~Alkyl phosphonic acid derivatives (e.g. ATMP, HEDP, DTPMP) and their salts~~
HDD	— (only for professional products) Fragrances
HSC	— Aromatic hydrocarbons — Halogenated hydrocarbons

3. Criterion Excluded and Restricted substances
a(i) - Excluded substances

Criterion wording has been modified

The words ‘nor as impurities’, of the first proposal, are deleted.

Reasons for deletion:

- Maintain consistency with Table 1 of the Commission Decisions “Threshold levels applicable to ingoing substances” and the threshold defined as “ no limit”
- Not all impurities will be known
- Analytical limits of detection

TR2 Proposed sub-criterion (a) specified excluded and restricted substances **(*i*) Excluded substances**	
	The substances indicated below shall not be included as ingoing substances in the final product or as ingoing substances to the ingredients used to make the final product: ~~regardless of concentration, neither as part of the formulation, as part of any mixture included in the formulation, nor as impurities:~~
ALL	— Substances listed in Annexes I or II to Regulation (EU) 2019/1021 on persistent organic pollutants; — Mercury and mercury compounds as defined in Article 2 of Regulation (EU) 2017/852 on Mercury; — Substances listed in Annexes I or II to Regulation (EC) No 1005/2009 on ozone layer depleting substances; — Substances listed in Annex XVII to Regulation (EC) No 1907/2006, unless in full compliance with the relevant conditions specified in that Annex and only if also explicitly permitted for use in criterion *Excluded and Restricted substances* in its sub-criterion *Hazardous substances* and compliant with associated derogation conditions;

EU Taxonomy alignment

EU Ecolabel & 'do no significant harm’ DNSH criteria of EU Taxonomy target best-in-class products.

EU taxonomy: six DNSH criteria set out in the Commission Delegated Regulation (EU) 2021/2139 and (EU) 2023/2486

Proposed alignment with EU Taxonomy requirements relevant to Detergents, with exclusions for RoHS and already-covered criteria (e.g. SVHC)

European Commission

3. Criterion Excluded and Restricted substances
a(i) - Excluded substances

EU Taxonomy alignment and potential conflict with other EU Ecolabel restrictions

Generic criteria for DNSH

The activity does not lead to the manufacture, placing on the market or use of:

(e) substances, whether on their own, in mixtures or in an article, listed in Annex XVII to Regulation (EC) No 1907/2006, except where there is full compliance with the conditions specified in that Annex;

REACH Annex XVII

Column 1 Designation of the substance, of the group of substances or of the mixture	Column 2 Conditions of restriction
46. (a) Nonylphenol $C_6H4(OH)C_9H_{19}$ ►M61 ◄	Shall not be placed on the market, or used, as substances or in mixtures in concentrations equal to or greater than 0,1 % by weight for the following purposes: (1) industrial and institutional cleaning except: — controlled closed dry cleaning systems where the washing liquid is recycled or incinerated, — cleaning systems with special treatment where the washing liquid is recycled or incinerated. (2) domestic cleaning;
(b) Nonylphenol ethoxylates $(C_2H_4O)_nC_{15}H_{24}O$	

EU Ecolabel Excluded substances requirement

— Alkylphenols, Aalkyl phenol ethoxylates (APEOs) and their ~~ether alkyl phenol~~ derivatives, as referred to in entry 43 to Annex XIV or entry 46 to Annex XVII of Regulation (EC) 1907/2006;¶

TR2 Proposed sub-criterion (a) specified excluded and restricted substances

***(i)* Excluded substances**

ALL	The substances indicated below shall not be included as ingoing substances in the final product or as ingoing substances to the ingredients used to make the final product: ~~regardless of concentration, neither as part of the formulation, as part of any mixture included in the formulation, nor as impurities:~~ — Substances listed in Annexes I or II to Regulation (EU) 2019/1021 on persistent organic pollutants; — Mercury and mercury compounds as defined in Article 2 of Regulation (EU) 2017/852 on Mercury; — Substances listed in Annexes I or II to Regulation (EC) No 1005/2009 on ozone layer depleting substances; — Substances listed in Annex XVII to Regulation (EC) No 1907/2006, unless in full compliance with the relevant conditions specified in that Annex and only if also explicitly permitted for use in criterion *Excluded and Restricted substances* in its sub-criterion *Hazardous substances* and compliant with associated derogation conditions;

The wording was modified compared to the EU Taxonomy, and an additional sentence was included to avoid conflict and confusion. The modification was also made to consider the case where a substance is derogated in the EU Ecolabel.

Feedback from stakeholders is required

European Commission

3. Criterion Excluded and Restricted substances a(i) - Excluded substances

Endocrine Disruptors (EDs)

Changes overview:

- Changes of wording
- Exclusion of substances classified as EDs in Category 1 (Known or Presumed EDs) and Category 2 (Suspected EDs)
- Exclusion of substances identified as having endocrine-disrupting properties
- Reference to Official lists:
  - Annex VI of the CLP Regulation 1272/2008
  - Candidate List of REACH Regulation 1907/2006
  - Biocidal Products Regulation (BPR) 528/2012
  - Plant Protection Products Regulation (PPPR) 1107/2009

Transition periods for inclusion in CLP Annex VI of identified and under evaluation substances:
- 2025 for the candidate list of SVHC under REACH
- 2030 for BPR
- 2032 for PPPR

No reference to other lists:
- ECHA's EDs assessment list
- National Competent Authorities lists

TR2 Proposed sub-criterion (a) specified excluded and restricted substances

***(i)* Excluded substances**

~~Substances identified to have endocrine disrupting properties,~~

— Substances classified as ~~considered to be potential~~ category 1 or category 2 endocrine disruptors for human health or the environment in accordance with CLP Regulation (EC) 1272/2008, substances included in the candidate list referred to in Article 59(1) of REACH Regulation (EC) 1907/2006 as having endocrine-disrupting properties for human health or the environment, substances identified as having endocrine-disrupting properties in accordance with Regulation (EU) No 528/2012 or Regulation (EC) No 1107/2009~~in category 1 or 2 on the EU's priority list of substances that are to be investigated further for endocrine disruptive effects~~.

Main streams of evidences:

Regulatory Developments
- December 2022, Delegated Act establishing new hazard classes for EDs
- Commission Delegated Regulation (EU) 2023/707, which amends CLP
- Regulation (EU) 2024/2865 amending Article 37 of the CLP Regulation.

European Commission

3. Criterion Excluded and Restricted substances (i) - Excluded substances and (ii) - Restricted substances

Isothiazolinones and other preservatives

TR2 Proposed sub-criterion (a) specified excluded and restricted substances

(*i*) Excluded substances

- Formaldehyde and ~~its~~ preservatives that are formaldehyde releasers, such as:
  - ~~(e.g.~~ 2-bromo-2-nitropropane-1,3-diol (Bronopol, CAS No 52-51-7);
  - 5-bromo-5-nitro-1,3-dioxane (Bronidox, CAS No 30007-47-7);
  - sodium hydroxyl methyl glycinate (CAS No 70161-44-3);
  - diazolidinylurea~~)~~ (CAS No 78491-02-8);
  - DMDM-Hydantoin (CAS No 6440-58-0);
  - Quaternium-15 (CAS No 4080-31-3), and
  - Tetramethylolglycoluril (CAS No 5395-50-6).

  ~~with~~ tThe only exception to this restriction shall be for ~~of~~ impurities of formaldehyde in surfactants based on polyalkoxy chemistry up to a concentration of 0,010 % weight by weight in the supplied surfactant ~~ingoing substance~~;
- Glutaraldehyde (CAS No 111-30-8),
- Hydroxyisohexyl 3-cyclohexene carboxaldehyde (HICC, CAS No 31906-04-4);
- Methylisothiazolinone (MIT, CAS No 2682-20-4);
- 5-chloro-2-methyl-4-isothiazolin-3-one/2-methyl-4-isothiazolin-3-one (CMIT/MIT, CAS No 55965-84-9);
- Microplastics (Synthetic Polymer Microparticles),
- Nanomaterials,
- Nitromusks and polycyclic musks,
- Organic chlorine compounds and hypochlorites,
- ~~Per- and polyfluoroalkyl substances (PFAS),~~
- Quaternary ammonium salts which are not readily biodegradable and/or classified with any of the hazards listed in Article 57 to Regulation (EC) 1907/2006;

Changes overview:

Formaldehyde Releasers:

- Expanded List with additional example (from Blue Angel criteria)
- Inclusion of abbreviation, short-hand names and CAS numbers

Quaternary ammonium salts

Expanded requirements with additional condition:
they must not be classified with any hazards listed in article 57 of REACH.

Aims: prevent the use of quaternary ammonium salts (for instance) with CMR classification, up to 0.010% w/w in the final Product regardless of their biodegradability.

3. Criterion Excluded and Restricted substances
(i) - Excluded substances and (ii) - Restricted substances

Isothiazolinones and other preservatives

TR2 Proposed sub-criterion (a) specified excluded and restricted substances

(*i*) Excluded substances

- Formaldehyde and ~~its~~ preservatives that are formaldehyde releasers, such as:
  - ~~(e.g.~~ 2-bromo-2-nitropropane-1,3-diol (Bronopol, CAS No 52-51-7);
  - 5-bromo-5-nitro-1,3-dioxane (Bronidox, CAS No 30007-47-7);
  - sodium hydroxyl methyl glycinate (CAS No 70161-44-3);
  - diazolidinylurea~~)~~ (CAS No 78491-02-8);
  - DMDM-Hydantoin (CAS No 6440-58-0);
  - Quaternium-15 (CAS No 4080-31-3), and
  - Tetramethylolglycoluril (CAS No 5395-50-6).

  ~~with~~ tThe only exception to this restriction shall be for ~~of~~ impurities of formaldehyde in surfactants based on polyalkoxy chemistry up to a concentration of 0,010 % weight by weight in the supplied surfactant ~~ingoing substance~~;
- Glutaraldehyde (CAS No 111-30-8),
- Hydroxyisohexyl 3-cyclohexene carboxaldehyde (HICC, CAS No 31906-04-4);
- Methylisothiazolinone (MIT, CAS No 2682-20-4);
- 5-chloro-2-methyl-4-isothiazolin-3-one/2-methyl-4-isothiazolin-3-one (CMIT/MIT, CAS No 55965-84-9);
- Microplastics (Synthetic Polymer Microparticles),
- Nanomaterials,
- Nitromusks and polycyclic musks,
- Organic chlorine compounds and hypochlorites,
- Per- and polyfluoroalkyl substances (PFAS),
- Quaternary ammonium salts which are not readily biodegradable and/or classified with any of the hazards listed in Article 57 to Regulation (EC) 1907/2006;

MIT and CIMT/MIT

First proposal (TR1), exclusion of MIT and CIMT/MIT

No changes in TR2

Due also to the difficulty in preserving products with the new MIT and CMIT/MIT (3:1) concentration limit of 0.0015% w/w, (13th Adaptation to Technical Progress (ATP))

Exclusion in line with:

- Nordic Swan
- EU Ecolabel of absorbent hygiene products
- EU Ecolabel of cosmetic

Benzisothiazolinone (BIT)

No changes: The current requirements for BIT remain unchanged, with a concentration limit of 0.005% w/w

European Commission

3. Criterion Excluded and Restricted substances (i) - Excluded substances and (ii) - Restricted substances

Criteria reference	Substance name	CAS number	CLP classification(s)	Remarks
Exclusions of specific preservative substances (a) (i)	Bronopol	52-51-7	**H:** H301, H312, H314, H317, H318, H335, H400 (M=100), H410 (M=100)	Expected to be these classifications if RAC opinion is adopted
	Bronidox	30007-47-7	**J:** H302, H314, H318, H373, H400, H410	Explicitly banned in Blue Angel criteria
	Sodium hydroxymethyl glycinate	70161-44-3	**H:** 302, H315, H317, H319, H332, H335, H341, H350	
	Diazolidinylurea	78491-02-8	**J:** H319	Explicitly banned by Blue Angel, but hazards do not seem so important.
	DMDM-Hydantoin	6440-58-0	**J:** H302	
	Quaternium-15	4080-31-3	**S:** H301, H302, H311, H315, H317, H319, H400, H412	Explicitly banned in Blue Angel criteria
	Tetramethylolglycoluril	5395-50-6	**J:** H317, H350, H411	
	Glutaraldehyde	111-30-8	**H:** H301, H314, H317, H330, H334, H335, H400 (M=10), H411	
	MIT	2682-20-4	**H:** H301, H311, H314, H317 (0.0015%), H318, H330, H400 (M=10), H410	
	Quaternary ammonium salts	63393-96-4	**J:** H301, H314, H318, H360FD, H361d, H373, H400, H410	Under assessment as PBT. Blue Angel allows them if readily biodegradable.
	CMIT/MIT	55965-84-9	**H:** H301, H310, H314, H317 (0.0015%), H318, H330, H400 (M=100), H410 (M=100)	
	Triclosan	3380-34-5	H: H315, H318, H400, H410 (M=100)	Under assessment as endocrine disruptor and PBT
	IPBC	55406-53-6	H: H302, H317, H318, H331, H372, H400 (M=10), H410	Under assessment as endocrine disruptor

Comparison of different preservatives that are excluded, restricted or non-restricted

- Any hazard codes highlighted in red are examples of hazards that are restricted in the horizontal CLP criteria for EU Ecolabel products.
- Hazard codes in bold red and highlighted in blue are CMR hazards.
- The initials “H”, “J” and “S” stand for the type of CLP classification for that substance. “H” means a harmonised classification, “J” stands for “Joint entry” and “S” stands for Self-classifications.

Criteria reference	Substance name	CAS number	CLP classification(s)	Remarks
Restricted preservatives (a) (ii)	BIT	2634-33-5	**H:** H302, H317 (0.036%), H318, H335, H400, H410	New classification applicable from Sept. 2025. Only allowed up to 0.0050%.
	OIT	26530-20-1	**H:** H301, H311, H314, H317 (0.0015%), H318, H330, H400 (M=100), H410 (M=100)	Only allowed up to 0.0015%.

Criteria reference	Substance name	CAS number	CLP classification(s)	Remarks
Examples of non-restricted preservatives	Sodium benzoate	532-32-1	**J:** H319	
	Phenoxyethanol	122-99-6	**H:** H302, H318, H335	
	Formic acid	64-18-6	**H:** H314	Only allowed in Blue Angel up to 0.5% of free acids
	EGForm	3586-55-8	**J:** H302, H315, H318	Technically a formaldehyde releaser, but has no restricted hazards
	(benzyloxy)methanol	14548-60-8	**S:** H302, H312, H315, H318	

Additional preservatives information gathered from stakeholders:

- **Sodium pyrithione** is heavily restricted under the CLP rules due to its aquatic toxicity
- **Lactic acid** shows insufficient preservation activity
- **DBPNA** is undergoing assessment for EDs properties
- **Phenoxyethanol** is stable over a broad pH range

European Commission

3. Criterion Excluded and Restricted substances (i) - Excluded substances and (ii) - Restricted substances

Isothiazolinones and other preservatives

Points for discussion 8 – Excluded & Restricted Substances (preservatives)

Stakeholders are invited to reply the following consultation questions:

- Question 38 (**Q38) –** Would you be able to help define a more exhaustive list of formaldehyde-releasing preservatives?
- Question 39 (**Q39)** – Would you be able to help construct a list of preservatives that can currently be used and which cannot be used in EU Ecolabel detergents (based on the current proposals)?
- Question 40 (**Q40)** – Is formic acid considered as a formaldehyde preservative or formaldehyde-releasing preservative? Should it be permitted in the same way that the Blue Angel criteria permit it (i.e. up to 0.5%)?
- Question 41 (**Q41)** – Based on the very different CLP classifications listed in the relevant Table 45, should all potentially formaldehyde-releasing preservatives be treated equally in terms of exclusions? Or should the least hazardous ones be permitted? (e.g. diazolidinyl urea (CAS No 78491-02-8), DMDM-Hydantoin (CAS No 6440-58-0), formic acid (CAS No 64-18-6), EGForm (CAS No 3586-55-8) or (benzyloxy)methanol (CAS No 14548-60-8).
- Question 42 (**Q42)** – Please, share any other comments/suggestions you deem relevant about this criterion providing reasons supporting them.

3. Criterion Excluded and Restricted substances
a(ii) Restricted substances – Total phosphorus (P) content

Product group	Product type	P content
HSC	All-purpose cleaners, RTU	~~0,02~~0,01 g/l of RTU product
HSC	All-purpose cleaners, undiluted	~~0,02~~0,01 g/l of cleaning solution
HSC	Kitchen cleaners, RTU	~~1,00~~ 0,10 g/l of RTU product
HSC	Kitchen cleaners, undiluted	~~1,00~~ 0,10 g/l of cleaning solution
HSC	Window cleaners, RTU	0,00 g/l of RTU product
HSC	Window cleaners, undiluted	0,00 g/l of cleaning solution
HSC	Sanitary cleaners, RTU	~~1,00~~ 0,10 g/l of RTU product
HSC	Sanitary cleaners, undiluted	~~1,00~~ 0,10 g/l of cleaning solution
HDD	Hand Dishwashing Detergents	~~0,08~~ 0,01 g/l of washing water.
DD	Dishwashing Detergents	0,20 g/wash for dishwasher detergents
DD	Rinse aids	0,030 g/wash for rinse aids
LD	Laundry detergents	~~0,04~~ 0,03 g/kg of laundry for laundry detergents
LD	Stain removers	0,005 g/kg of laundry for stain removers

First proposal (TR1)

Proposals not completed

Second proposal (TR2)

Thresholds revised

Main streams of evidences:

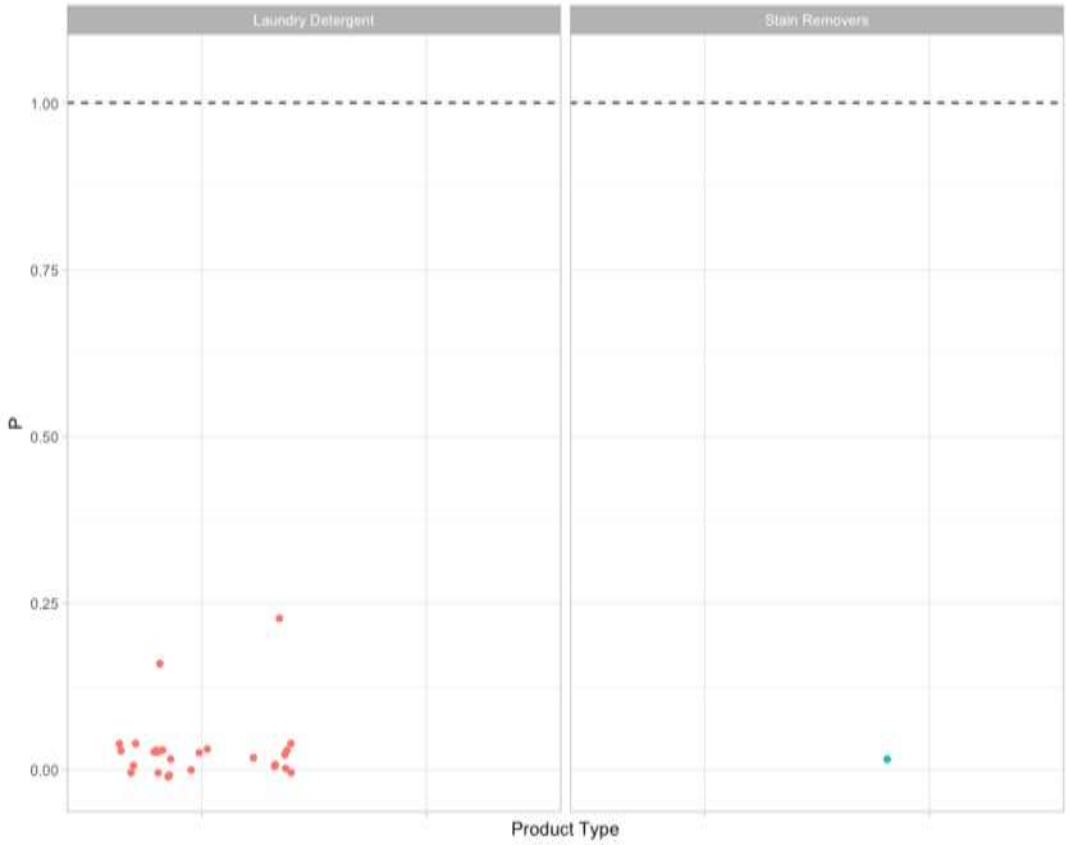
- Focused questionnaire (**JRC data analysis**)
- Stakeholders feedback (TR1)
- Other ecolabels (NS, BA)

3. Criterion Excluded and Restricted substances
a(ii) Restricted substances – Total phosphorus (P) content

Laundry Detergent (LD)
(g/kg wash)

Product type	Acronym	Existing	TR1	TR2	Number (n)	Data Analysis	Other ecolabels	Stakeholders
Light duty detergent	LD	*0.04*	*0.03*	*0.015*	40	0.00	*0.03* (BA & NS)	0.03 or 0.01
Stain removers	SR	*0.005*	*0.005*	*0.005*	2	0.00	*0.005* (BA & NS)	

Additional data needed for Stain Removers



Question 44 (**Q44**) – Would you support reducing the phosphorus limit for stain removers to below 0.005 g/kg, possibly even to phosphorus-free formulations? Additionally, could you provide data on phosphorus content in consumer stain remover products to assist in revising the criteria and ensuring that any new limits are appropriately ambitious?

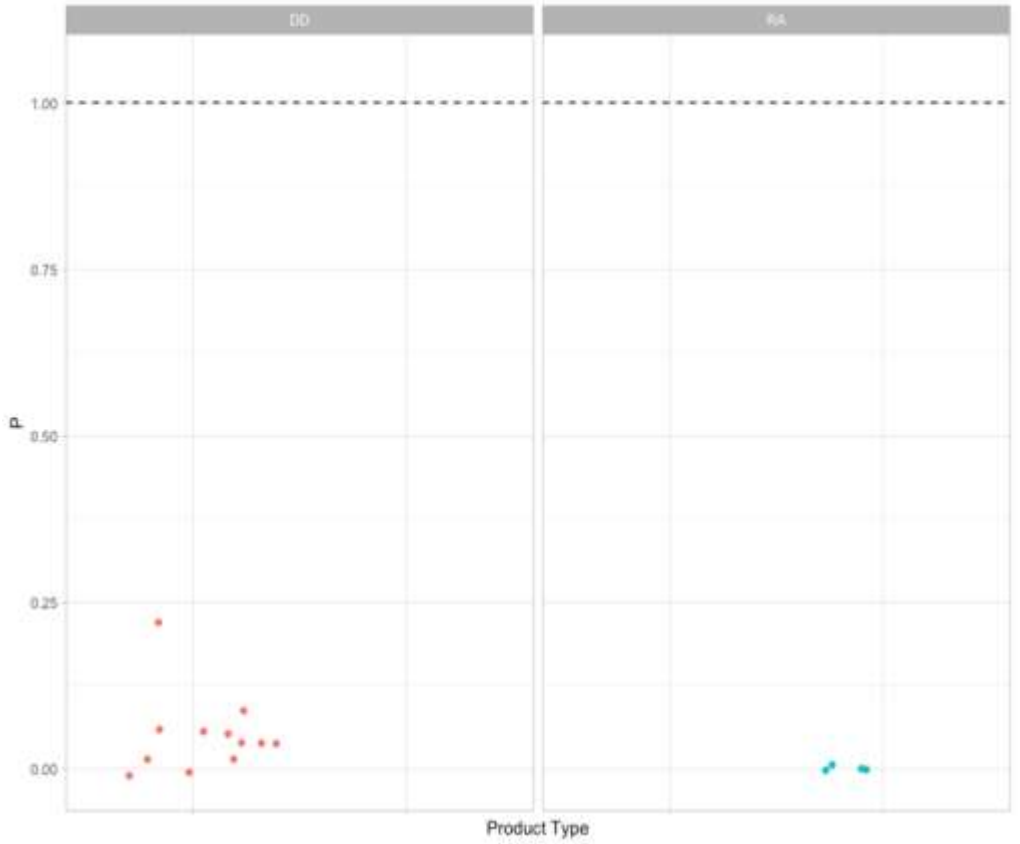
European Commission

3. Criterion Excluded and Restricted substances
a(ii) Restricted substances – Total phosphorus (P) content

Dishwasher detergent (DD) (g/wash)

Product type	Acronym	Existing	TR1	TR2	Number (n)	Data Analysis	Other ecolabels	Stakeholders
Dishwasher detergent	DD	*0.20*	*0.20*	*0.01*	14	*0.01*	*0.20* (BA & NS)	0.01
Rinse Aid	RA	*0.03*	*0.03*	*0.005*	4	0.00	*0.03* (BA & NS)	

Additional data needed for Rinse Aid



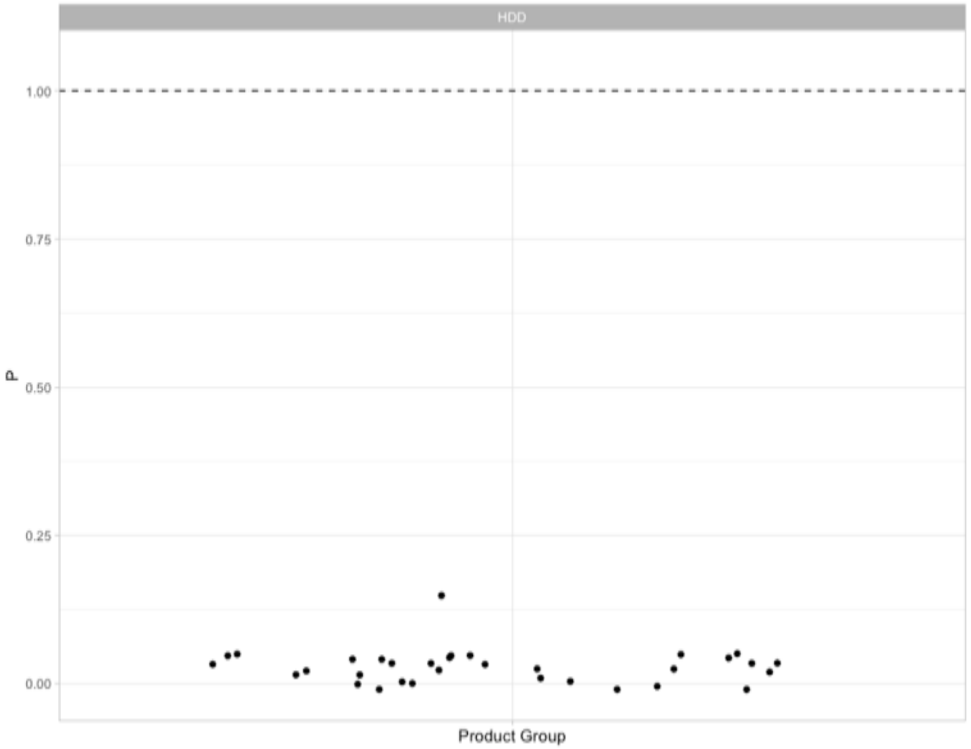
Question 45 (**Q45**) – Would you support reducing the phosphorus limit for rinse aids to below 0.005 g/wash, possibly even to phosphorus-free formulations? Additionally, could you provide data on phosphorus content in consumer rinse aid products to assist in revising the criteria and ensuring that any new limits are appropriately ambitious?

European Commission

3. Criterion Excluded and Restricted substances
a(ii) Restricted substances – Total phosphorus (P) content

Hand dishwashing detergent (HDD)
(g/l dishwashing water)

Product type	Acronym	Existing	TR1	TR2	Number (n)	Data Analysis	Other ecolabels
Hand-dishwashing detergent	HDD	*0.08*	*0.01*	*0.00*	51	*0.01*	*0.01* (BA)



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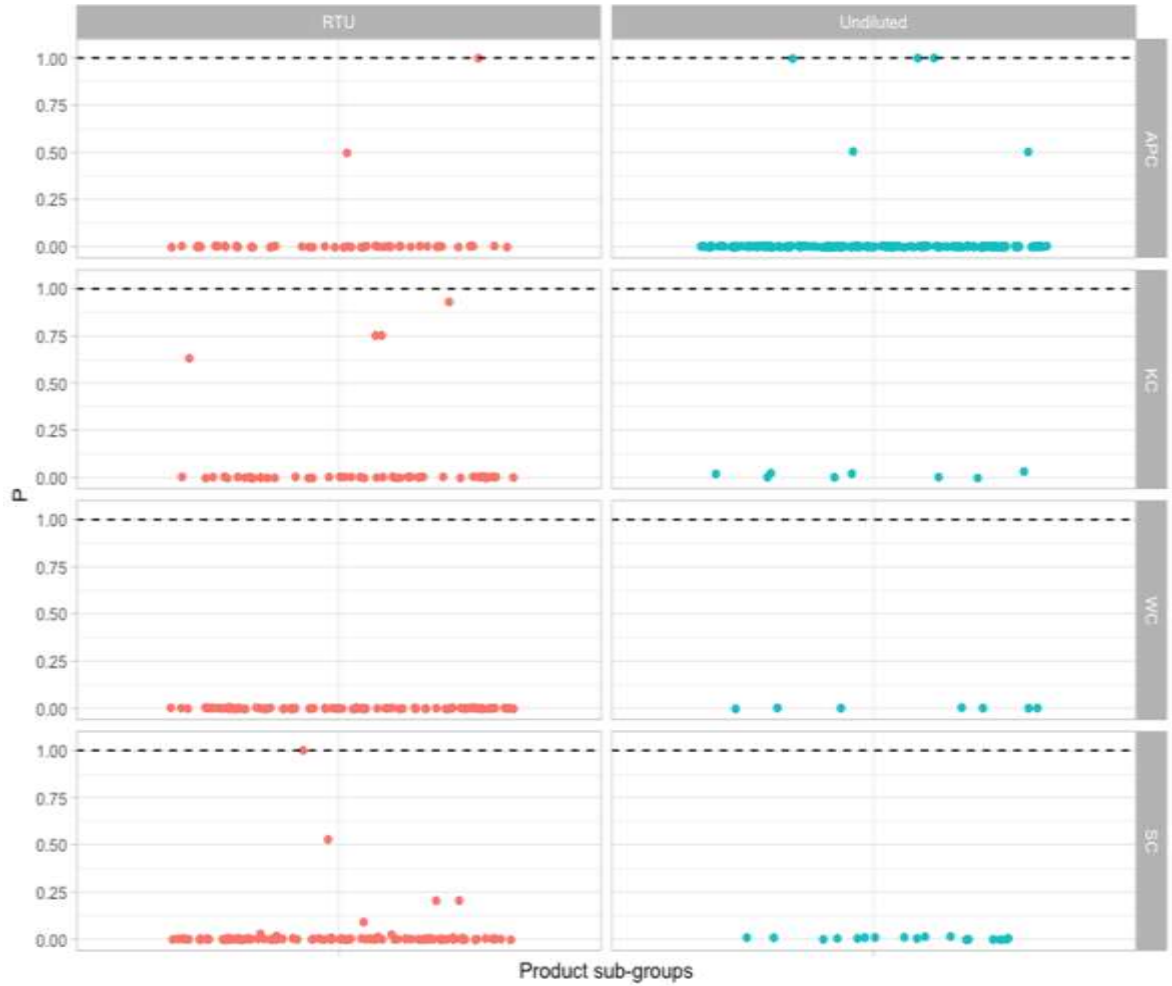
3. Criterion Excluded and Restricted substances
a(ii) Restricted substances – Total phosphorus (P) content

Hard-surface cleaning products total phosphorus **(g/L)**

Product type	Acronym	Concentration	Existing	TR1	TR2	Number (n)	Data Analysis	Other ecolabels
All-purpose cleaners	APC	RTU	0.02	0.01	0.00	49	0.00	
All-purpose cleaners	APC	Undiluted	0.02	0.01	0.00	158	0.00	*0.01* (BA)
Kitchen cleaners	KC	RTU	1.00	0.10	0.01	49	0.00	*0.1* (BA)
Kitchen cleaners	KC	Undiluted	1.00	0.10	0.01	8	0..03	*0.1* (BA)
Window cleaners	WC	RTU	0.00		0.00	77	0.00	0.0010 (BA)
Window cleaners	WC	Undiluted	0.00		0.00	7	0.00	0.0010 (BA)
Sanitary cleaners	SC	RTU	1.00	0.10	0.01	105	0.00	*0.1* (BA)
Sanitary cleaners	SC	Undiluted	1.00	0.10	0.01	17	0.01	*0.1* (BA)

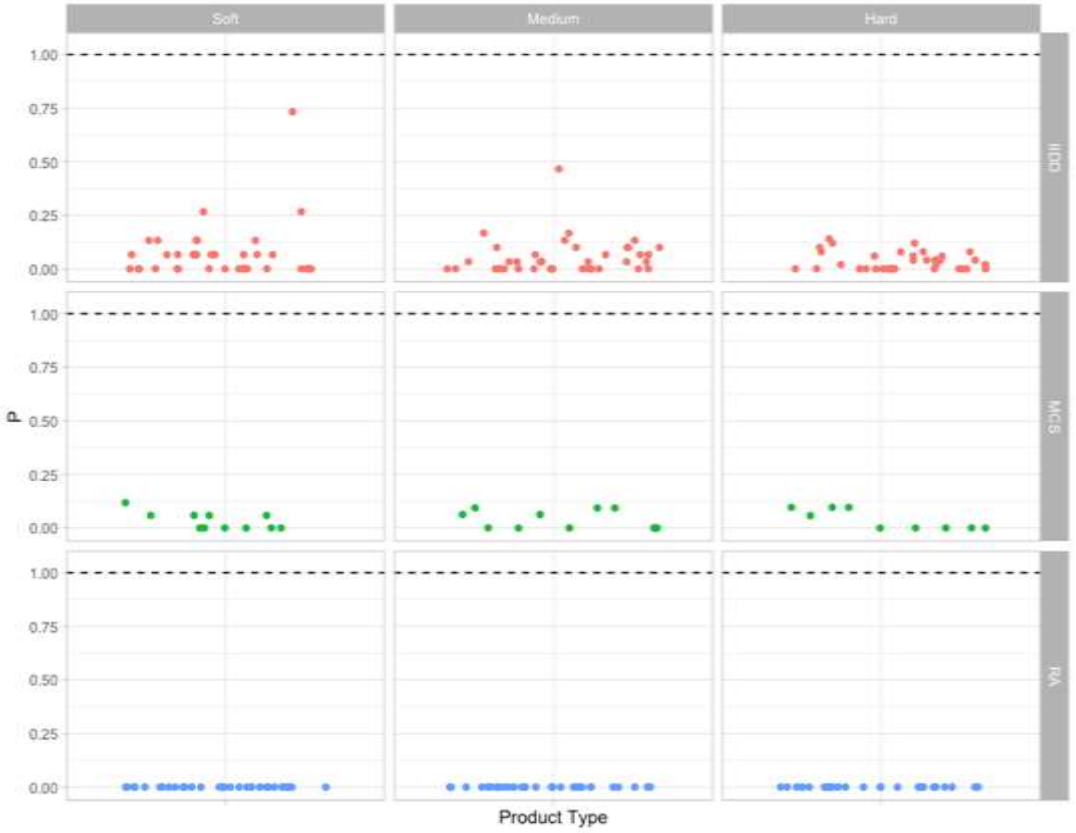


Only 16 out of a total of 470 data points showing a phosphorus content higher than zero

3. Criterion Excluded and Restricted substances
a(ii) Restricted substances – Total phosphorus (P) content

Product type	Acronym	Water hardness	Existing	TR1	TR2	Number (n)	Data Analysis	Other ecolabels	Stakeholders
IIDD	IIDD	Soft	0.15	0.15	0.01	37	0.010	0.01 (NS)	< 0.01 0.01 0.02
IIDD	IIDD	Medium	0.3	0.3	0.03	37	0.030	0.01 (NS)	< 0.01 0.02 0.04
IIDD	IIDD	Hard	0.5	0.5	0.05	35	0.030	0.01 (NS)	< 0.01 0.03 0.06
Multicomponent system	MSC	Soft	0.17	0.17	0.01	11	0.010		0.04
Multicomponent system	MSC	Medium	0.32	0.32	0.03	11	0.025		0.06
Multicomponent system	MSC	Hard	0.52	0.52	0.05	9	0.050		0.08
Rinse aids	RA	Soft	0.02	0.02	0.00	29	0.000		P-free 0.01
Rinse aids	RA	Medium	0.02	0.02	0.00	28	0.000		P-free 0.02
Rinse aids	RA	Hard	0.02	0.02	0.00	26	0.000		P-free 0.03

Industrial and Institutional dishwasher detergent (IIDD)
(g/L water)



No data for pre-soaks

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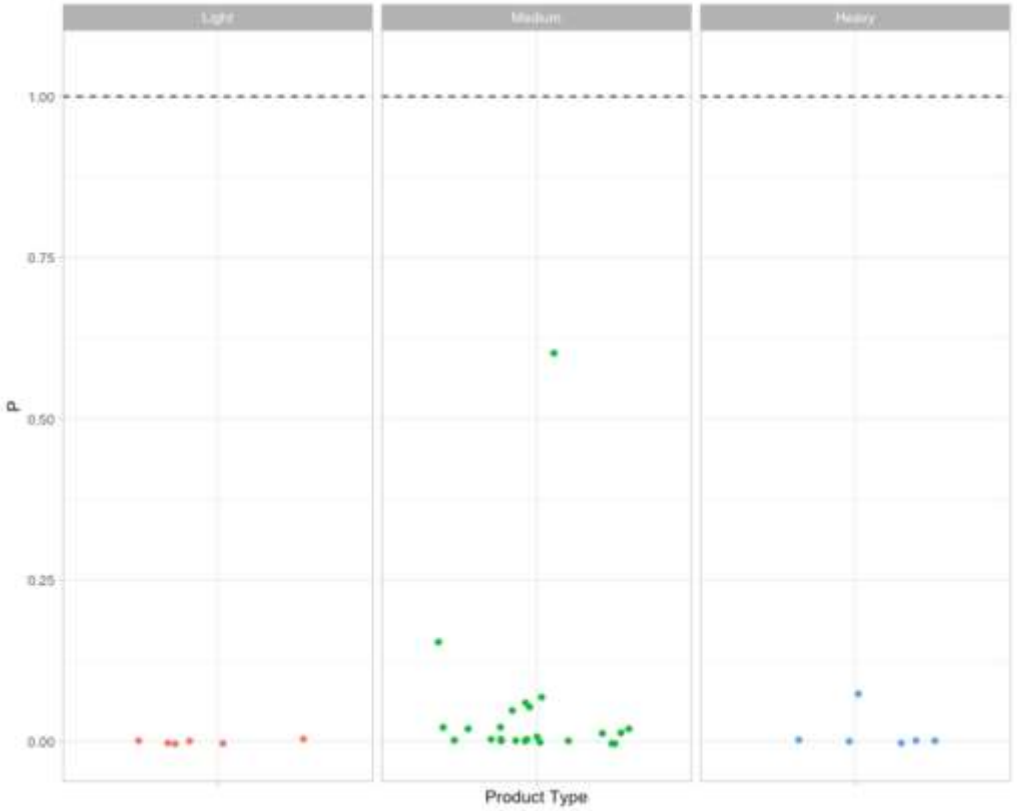
3. Criterion Excluded and Restricted substances
a(ii) Restricted substances – Total phosphorus (P) content

Industrial and Institutional laundry detergent (IILD)
(g/kg laundry)

Product type	Degree of soiling	Existing	TR1	TR2	Number (n)	Data Analysis	Other ecolabels	Stakeholders
IILD	Light	0.5	0.5	0.01	6	0.00	0.075 (NS)	P-free 0.01
IILD	Medium	1	1	0.03	24	0.028	0.10 (NS)	0.02 0.05
IIDD	Heavy	1.5	1.5	0.1	6	0.105	0.15 (NS)	0.03 0.06



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3. Criterion Excluded and Restricted substances
a(ii) Restricted substances – Total phosphorus (P) content

Alkyl phosphonic acid derivatives (e.g. ATMP, HEDP, DTPMP) and their salts

Initial Proposal (TR1): Ban on Alkyl Phosphonic Acid Derivatives (e.g., ATMP, HEDP, DTPMP) and their salts
Stakeholders Feedback: Mixed responses; some supported exclusions, while the majority raised concerns about product efficacy and finding alternatives.

Key Considerations:
Properties:
- Essential in detergent formulations for addressing water hardness.
- Used at 20-30 times lower concentrations than phosphates for similar efficacy.
- Crucial in preventing mineral deposits, extending appliance lifespan, and protecting textiles and tableware
- Lower environmental impact due to minimal concentration use compared to phosphates.

Revised Proposal:

Withdraw Ban and Introduce Stricter P-Content Limits:
- Set more ambitious phosphorus content thresholds across all detergent product groups.
- Balance functionality with environmental considerations

European Commission

3. Criterion Excluded and Restricted substances
a(ii) Restricted substances – Total phosphorus (P) content

- Question 43 (**Q43**) – Do you agree with the proposed phosphorus content thresholds for the different detergent product groups? If not, please specify which product group(s) you disagree with and provide your reasons for disagreement.
- Question 44 (**Q44**) – Would you support reducing the phosphorus limit for stain removers to below 0.005 g/kg, possibly even to phosphorus-free formulations? Additionally, could you provide data on phosphorus content in consumer stain remover products to assist in revising the criteria and ensuring that any new limits are appropriately ambitious?
- Question 45 (**Q45**) – Would you support reducing the phosphorus limit for rinse aids to below 0.005 g/wash, possibly even to phosphorus-free formulations? Additionally, could you provide data on phosphorus content in consumer rinse aid products to assist in revising the criteria and ensuring that any new limits are appropriately ambitious?
- Question 46 (**Q46**) – For Industrial and Institutional dishwasher detergents (IIDD), do you think it would be feasible to implement a single phosphorus content threshold regardless of water hardness, in alignment with the Nordic Swan standard?
- Question 47 (**Q47**) – For IIDD: given the absence of specific data on pre-soaks, do you consider it feasible to eliminate the phosphorus content requirement for this sub-product? Please share any insights or considerations that could inform this decision
- Question 48 (**Q48**) – Considering that the proposed phosphorus content thresholds for Industrial and Institutional Dishwasher Detergents (IIDD) and Multicomponent Systems are the same across all water hardness levels, do you believe it is necessary to separate thresholds between IIDD and Multicomponent Systems? Please provide your rationale and any supporting data or insights.
- Question 49 (**Q49**) – Is a phased approach to implementing a complete ban on phosphates in industrial and institutional detergent products feasible for your organization? If yes, what timeline would be realistic for transitioning to phosphate-free products without disrupting operations?
- Question 50 (**Q50**) – Please, share any other comments/suggestions you deem relevant about this criterion providing reasons supporting them.

3. Criterion Excluded and Restricted substances
a(ii) Restricted substances – VOC

Product type	VOC limit
All-purpose cleaners, RTU	~~1~~ 15 g/l of RTU product
All-purpose cleaners, undiluted	1 g/l of cleaning solution
Kitchen cleaners, RTU	~~10~~ 30 g/l of RTU product
Kitchen cleaners, undiluted	10 g/l of cleaning solution
Window cleaners, RTU	~~100~~ 60 g/l of RTU product
Window cleaners, undiluted	~~100~~ 30g/l of cleaning solution
Sanitary cleaners, RTU	10 g/l of RTU product
Sanitary cleaners, undiluted	~~10~~ 5 g/l of cleaning solution

VOCs definition is maintained:
VOCs means any organic compound having a boiling point lower than 150 °C

The RTU VOC values are significantly higher than the undiluted VOC values.

This discrepancy could be attributed to the differences in units and reference dosages used for RTU and undiluted products (?)

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3. Criterion Excluded and Restricted substances a(ii) Restricted substances – VOC

- Question 51 (**Q51**) – Data provided from EUEL products show that the VOC content in g/L of cleaning water for undiluted products is much lower than that in RTU products. How can the significantly lower VOC content in undiluted products be explained compared to RTU products?
- Question 52 (**Q52**) What are your views on the potential exemption of ethanol from being counted as a VOC in HSC products, and do you believe this exemption should apply to all HSC products or be restricted to specific cleaners, such as window cleaners, where the exemption might be more relevant?
- Question 53 (**Q53**) – Would the potential exemption of ethanol from VOC calculations make it feasible to reduce the proposed VOC limit to a lower threshold for HSC ready-to-use and undiluted products? If yes, what changes would you suggest?
- Question 54 (**Q54**) Please, share any other comments/suggestions you deem relevant about this criterion providing reasons supporting them.

Questions / Comments?

European Commission

Revision of the EU Ecolabel criteria for
DETERGENT AND CLEANING PRODUCTS

BREAK (15')

ETIQUETTE FOR VIRTUAL MEETING PARTICIPANTS

- **Please indicate "NAME OF YOUR ORGANIZATION + YOUR FULL NAME"**
- **MUTE YOUR MIC AND SWITCH OFF you CAMERA (unless you have the floor)**
- **USE THE CHAT only to ask for the FLOOR (write "FLOOR" in the chat), and COMMENT only ORALLY**

Agenda

Day 2: Thursday 13th March 2025 (Morning)

No	Item	SCHEDULE
1.	Opening of virtual room and welcome of participants	09:00 – 09:15
2.	Criterion “Toxicity to aquatic organisms”	09:15 – 09:45
3.	Criterion “Restricted substances”	09:45 – 11:00
Coffee Break (15 min)		*11:00 – 11:15*
4.	Criterion “Restricted substances”	11:15 – 12:30
5.	Criterion “Sustainable sourcing”	12:30 – 13:00

European Commission

4. Criterion “Excluded and Restricted substances” [Part 2 of 2; targeting sub-criterions b,d, e,f, h]

European Commission

4. Criterion Excluded and Restricted substances
b) Hazardous substances

TR1 proposal: Inclusion in the Table with restricted hazard classes, of new hazard classes for:

- Endocrine disruption for human health and environment (ED HH and ED ENV.
- Persistent, bioaccumulative, toxic (PBT) and very persistent, very bioaccumulative (vPvB)
- Persistent, mobile, toxic (PMT) and very persistent, very mobile (vPvM)

TR2 proposal: update of the wording also in line with EU Ecolabel criteria for paints and varnishes

Changes overview:

- "(i) final product" heading, additional hazards have been included
- "(ii) ingoing substances", changes: 1) "final product formulation" instead of "final product."; 2) "hazard classes, categories, codes, and associated hazard statements" instead of "hazard classifications and their categorization

TR2 proposals for sub-criterion (b) hazardous substances (with changes from TR1 highlighted)	
	(*i*) Final product
	The final product shall not be classified ~~and labelled~~ as being carcinogenic, mutagenic or toxic for reproduction, acutely toxic, an aspiration hazard, a specific target organ toxicant, a respiratory or skin sensitiser, ~~carcinogenic, mutagenic or toxic for reproduction, or~~ hazardous to the aquatic environment, hazardous to the ozone layer, an endocrine disruptor, persistent, bioaccumulative and toxic (PBT) or persistent, mobile and toxic (PMT) in accordance with ~~as defined in Annex I to~~ Regulation (EC) No 1272/2008 and specifically in terms of ~~in accordance with~~ the hazard classes, categories, codes and hazard statements stated ~~list~~ in Table 2.
	(*ii*) Ingoing substances
	Unless derogated in Table 3, Tthe final product formulation shall not contain ingoing substances ~~in at a~~ concentrations ~~limit~~ at or above 0,010 % weight by weight ofin the final product formulation that are classified, ~~meet the criteria for classification as hazardous to the aquatic environment, respiratory or skin sensitisers, carcinogenic, mutagenic or toxic for reproduction~~ in accordance with ~~Annex I to~~ Regulation (EC) No 1272/2008, with any of the hazard classes, categories codes and associated hazard statements stated ~~and in accordance with the list~~ in Table 2. ~~Where stricter, the generic or specific concentration limits determined in accordance with Article 10 of Regulation (EC) No 1272/2008 shall take precedence.~~
ALL	Table 2 Restricted hazard classes, categories, codes and associated hazard statements ~~classifications and their categorisation~~

4. Criterion Excluded and Restricted substances b) Hazardous substances

Changes overview to the table listing restricted CLP hazard classes:

- Added "H360" and "H361" for addresses cases where the appropriate suffix letters are not yet determined.
- Repositioned "H304" as an aspiration hazard.
- Added category "1" for "H317" and "H334" to clarify classification uncertainty

Additional changes

- Allow mixture classification when substance data is unavailable.
- exemption clause if ingoing hazardous substances are chemically modified during the production process, have been inserted (aligning with EU Ecolabel paints)
- Simplified criterion text for better understanding. Improve readability and remove redundancies.

Carcinogenic, mutagenic or toxic for reproduction	
Categories 1A and 1B	**Category 2**
H340: May cause genetic defects	H341: Suspected of causing genetic defects
H350: May cause cancer	H351: Suspected of causing cancer
H350i: May cause cancer by inhalation	
H360: May damage fertility or the unborn child	H361: Suspected of damaging fertility or the unborn child
Acute toxicity	
Categories 1 and 2	**Category 3**
H300: Fatal if swallowed	H301: Toxic if swallowed
H310: Fatal in contact with skin	H311: Toxic in contact with skin
H330: Fatal if inhaled	H331: Toxic if inhaled
~~H304: May be fatal if swallowed and enters airways~~	EUH070: Toxic by eye contact
Aspiration hazard	
Category 1	
H304: May be fatal if swallowed and enters airways	
Respiratory and skin sensitization	
Category 1, 1A and 1B	
H317: May cause an allergic skin reaction	
H334: May cause allergy or asthma symptoms or breathing difficulties if inhaled	

The hazard statement codes generally refer to substances. However, if information on substances cannot be obtained, the classification rules for mixtures shall apply.

The use of substances or mixtures that are chemically modified during the production process, so that any relevant hazard for which the substance or mixture has been classified under Regulation (EC) No 1272/2008 no longer applies, shall be exempted from the above requirement.

This criterion shall ~~does~~ not apply to ingoing substances covered by points (a) and (b) of Article 2(7)~~(a) and (b)~~ of Regulation (EC) No 1907/2006, which set out criteria for exempting substances within Annexes IV and V to that Regulation from the registration, downstream user and evaluation requirements. ~~In order to determine whether that exclusion applies, the applicant shall screen any ingoing substance present at a concentration above 0,010 % weight by weight.~~

4. Criterion Excluded and Restricted substances
b) Hazardous substances

Derogations

Table 3 Derogated substances

	Substance	Hazard statement
ALL	Surfactants	~~H400 Very toxic to aquatic life~~
		H412 Harmful to aquatic life with long-lasting effects
DD, HDD, IIDD, IILD LD	Subtilisin	H400 Very toxic to aquatic life
		H411 Toxic to aquatic life with long-lasting effects
ALL	Enzymes (*1)	H317 May cause allergic skin reaction
		H334 May cause allergy or asthma symptoms or breathing difficulties if inhaled
	Titanium dioxide (in a powder form containing 1% or more of particles with aerodynamic diameter ≤ 10μm)	H351 (inhalation) The applicant shall demonstrate that they have systems in place to minimise worker exposure to dry TiO_2 powder in the workplace (e.g. closed dosing systems, ventilated dosing and mixing areas and personal protective equipment).
	(*1) Enzymes (H334) ~~I~~including ~~stabilisers and~~ other auxiliary substances in ~~the~~ enzyme preparations (H317).	
IILD	ε-phthalimido-peroxy-hexanoic acid (PAP) used as bleaching agent at max concentration of 0,6 g/kg of laundry	H400 Very toxic to aquatic life
		H412 Harmful to aquatic life with long-lasting effects
	Peracetic acid/hydrogen peroxide used as bleaching agent	H400 Very toxic to aquatic life
		H410 Very toxic to aquatic life with long-lasting effects
		H412 Harmful to aquatic life with long-lasting effects
ALL	NTA as an impurity in MGDA and GLDA (*2)	H351 Suspected of causing cancer
	~~(*1) Enzymes (H334) including stabilisers and other auxiliary substances in the enzyme preparations (H317).~~	
	(*2) In concentrations lower than 0,2 % in the raw material as long as the total concentration in the final product is lower than 0,10 %.	

	Substance	Classification according to Regulation (EC) No 1272/2008	Hazard statement
HSC	Sulfamic acid (CAS No 5329-14-6)	Hazardous to the aquatic environment — Chronic Hazard, Category 2	H412: Harmful to aquatic life with long-lasting effects
	Substance	**Classification according to Regulation (EC) No 1272/2008**	**Hazard statement**
ALL	Benzoic acid (CAS No 65-85-0) (1)	Specific target organ toxicity, repeated exposure— Category 2	H372: Causes damage to organs through prolonged or repeated exposure
	Amidoamine residues (2)	Sensitisation, Skin – Category 1, 1A, 1B	H317: May cause an allergic skin reaction
	(1) Only derogated as an in-situ generated substance when sodium benzoate is added as a preservative and sodium benzoate shall only be permitted at levels up to 1,0% w/w of the final product formulation. (2) Only derogated when added as residues in CAPB surfactants and when the total quantity of H317 classified amidoamine residues is less than 0,10% w/w of the final product formulation.		

Changes overview:

- Removal of H400 Derogation for Surfactants Across All Detergent Product
- Inclusion of TiO2 derogation
- Inclusion of Sulfamic acid derogation for HSC products
- Benzoic acid derogation. Substance formed from sodium benzoate at pH < 7. Sodium benzoate preferred as a safer preservative.
- Amidoamine residues in cocamidopropyl betaine (CAPB) derogation, in line with EU Ecolabel cosmetics

4. Criterion Excluded and Restricted substances b) Hazardous substances

Rewording of Assessment & Verification Text

Aim: clarify expectations for applicants and suppliers to assess compliance or non-compliance with CLP restrictions and aligned proposals with EU Ecolabel for paints.

Changes overview

Provide Quantitative Information:
The applicant must supply quantitative data on substances with CLP hazards restricted by the EU Ecolabel, supported by declarations and any other relevant documentation from suppliers.

Data to Provide:
- A list of all ingredients, chemicals, or raw materials in the final formulation.
- Screening results for ingredients with any EU Ecolabel-restricted CLP hazards.
- Concentrations of any screened ingoing substances with EU Ecolabel-restricted CLP hazards.

Data Integration:
The provided data must be combined with quantitative information that only the detergent formulator possesses.

Assessment and verification: the applicant shall provide a signed declaration of ~~demonstrate~~ compliance with this criterion, supported by declarations and any other relevant documentation from suppliers. A list of all ingoing substances with one or more of the restricted CLP hazards calculated to be present in ~~for~~ the final product formulation ~~and for any ingoing substance present at a~~ in concentrations greater than 0,010 % weight by weight ~~in the final product~~ shall be presented, together with their CAS numbers, CLP (i.e. harmonised, joint entry or self-entries only) the relevant function of the ingoing substance (e.g. surfactant, enzyme etc.). Calculations shall be based on:

— a list of all ingredients, chemicals or raw materials used to make the final product formulation,

— the screening of ingredients, chemicals or raw materials for those ingoing substances with any of the EU Ecolabel-restricted CLP hazards,

— the concentrations of any screened ingoing substances with EU Ecolabel-restricted CLP hazards in the ingredients, chemicals or raw materials used, in the format supplied,

— the weight of each of the ingredients, chemicals or raw materials added to make a known weight of final product formulation.

~~The applicant shall provide a signed declaration of compliance supported by declarations from suppliers, if appropriate, or SDS confirming that none of these substances meets the criteria for classification with one or more of the hazard statements listed in Table 2 in the form(s) and physical state(s) in which they are present in the product.~~

Any screened ingoing substances shall be assumed by default to be 100 % retained in the final product. Justifications for any deviation from a retention factor of 100 % during processing (e.g. solvent evaporation) or for chemical modification of a screened ingoing substance shall be provided. Substances known to be released or to degrade from ingoing substances are considered ingoing substances and not impurities.

For any screened ingoing substances remaining in the final product formulation in concentrations greater than 0,010 % weight by weight, but which are exempted from this criterion ~~listed in~~ (see Annexes IV and V to Regulation (EC) No 1907/2006) ~~which are exempted from registration obligations under points (a) and (b) of Article 2(7) of that Regulation,~~ a declaration to this effect by the applicant shall suffice to comply.

~~The applicant shall provide a signed declaration of compliance supported by declarations from suppliers, if appropriate, or SDS confirming the presence of ingoing substances that fulfil the derogation conditions.~~

Regarding information requested from suppliers that may be commercially sensitive, evidence from suppliers can also be provided directly to competent bodies without necessarily providing certain details to the applicant.

4. Criterion Excluded and Restricted substances
b) Hazardous substances

Points for discussion 11 – Hazardous substances

Stakeholders are invited to reply the following consultation questions:

- Question 55 (**Q55**) –Do you support the proposed modifications to the criterion for Hazardous Substances? Please provide your reasoning or any additional comments.
- Question 56 (**Q56**) – Please, share any other comments/suggestions you deem relevant about this criterion providing reasons supporting them.

4. Criterion Excluded and Restricted substances (d) Fragrances

Changes overview:

- Exclusion of Substances: Annex II (Regulation (EC) No 1223/2009) fragrance substances excluded as ingoing substances in fragrance formulations
- Reference Update: Replaced reference from Table 13-1 of SCCS opinion to Annex III of the Cosmetics Regulation.
- Conditional Allowance of Fragrances: Fragrances conditionally permitted in products labeled "mild/sensitive."
- Compliance Certification Requirement: requirement for certificates of compliance with IFRA standards included in the assessment and verification process.

Main streams of evidences:

- Stakeholder Feedback and data analysis
- Regulatory Alignment and Updates
- Industry Standards and best Practices

TR2 Proposed sub-criterion (d) fragrances	
DD, HDD, HSC, IILD, LD	~~Products marked as "mild/sensitive" shall be fragrance-free.~~ ~~Substances listed under Table 13-1 of the SCCS opinion on 'Fragrance allergens in cosmetic products' ([360]) shall not be present in EU Ecolabel products in concentrations higher than 0,010% (by weight) per substance.~~ ~~Fragrances which are prohibited according to Annex II to the Cosmetics Regulation ([361]) shall not be present in EU Ecolabel products in concentrations ≥ 0,010 % (by weight) per substance.~~ Any ingoing substance added to the product as a fragrance shall be manufactured and handled following the code of practice of the International Fragrance Association (IFRA) ([362]). For such ingoing substances, the recommendations of the IFRA Standards concerning prohibition, restricted use and specified purity criteria for substances shall be followed by the fragrance formulator manufacturer. Fragrance substances which are prohibited in cosmetics products according to Annex II to Regulation (EC) No 1223/2009 ([363]) shall not be added as ingoing substances to fragrance formulations used in EU Ecolabel detergent products. Fragrance substances restricted in cosmetics products according to Annex III to the Cosmetics Regulation (EC) No 1223/2009 shall not be present in EU Ecolabel detergent products in concentrations ≥ 0,010 % (by weight) per substance. In addition, any EU Ecolabel detergent pProducts marked as "mild/sensitive" shall only use fragrance formulations that do not contain any ingoing substances that are classified as category 1 skin sensitisers (H317), category 1 respiratory sensitisers (H334) or fragrance allergens included in Annex III to Regulation (EC) No. 1223/2009 ~~be fragrance-free.~~
HDD	Fragrances shall not be used in hand dishwashing detergents for professional use.
IIDD	Industrial and institutional dishwasher products shall not contain any fragrances.
DD, HDD, HSC, IILD, LD	*Assessment and verification:* the applicant shall provide a signed declaration of compliance, supported by a signed declaration of compliance from the supplier or fragrance manufacturer, as appropriate, a certificate of conformity to the IFRA Standards, safety data sheets for any fragrance formulations used and calculations, if necessary, to demonstrate compliance with the 0,010 % thresholds for Annex II and Annex III fragrance substances present in the detergent product. ~~for Table 13-1 or Annex II fragrance substances.~~
IIDD	*Assessment and verification:* the applicant shall provide a signed declaration of compliance with the non-use of fragrances, supported by signed declarations of the non-use of fragrances from their suppliers.

4. Criterion Excluded and Restricted substances (d) Fragrances

Fragrances conditionally permitted in products labeled "mild/sensitive."

TR1 proposal: Products market as mild/sensitive shall be fragrances free

Majority of Stakeholders' feedback against
Main Arguments:

- Not all fragrance substances are skin sensitizers or allergens. Unnecessary to ban all fragrances.
- Reference to the EU Ecolabel situation in cosmetics, where the requirement has reduced the number of labeled products and led to "mild/sensitive" products rarely carrying the label.

Analysis of SDSs: 15 fragrances formulation. A total of 212 substances declared
Classification Summary:

- None of the substances classified as category 1 respiratory sensitizers (H334)
- > 110 substances classified as category 1 skin sensitizers (H317)

New proposal

Any EU Ecolabel detergent products marked as "mild/sensitive" shall only use fragrance formulations that do not contain any ingoing substances that are classified as category 1 skin sensitisers (H317), category 1 respiratory sensitisers (H334) or fragrance allergens included in Annex III to Regulation (EC) No. 1223/2009

TR2 Proposed sub-criterion (d) fragrances	
DD, HDD, HSC, IILD, LD	~~Products marked as "mild/sensitive" shall be fragrance-free.~~ ~~Substances listed under Table 13-1 of the SCCS opinion on 'Fragrance allergens in cosmetic products' ([360]) shall not be present in EU Ecolabel products in concentrations higher than 0,010% (by weight) per substance.~~ ~~Fragrances which are prohibited according to Annex II to the Cosmetics Regulation ([361]) shall not be present in EU Ecolabel products in concentrations ≥ 0,010 % (by weight) per substance.~~ Any ingoing substance added to the product as a fragrance shall be manufactured and handled following the code of practice of the International Fragrance Association (IFRA) ([362]). For such ingoing substances, the recommendations of the IFRA Standards concerning prohibition, restricted use and specified purity criteria for substances shall be followed by the fragrance formulator-manufacturer. Fragrance substances which are prohibited in cosmetics products according to Annex II to Regulation (EC) No 1223/2009 ([363]) shall not be added as ingoing substances to fragrance formulations used in EU Ecolabel detergent products. Fragrance substances restricted in cosmetics products according to Annex III to the Cosmetics Regulation (EC) No 1223/2009 shall not be present in EU Ecolabel detergent products in concentrations ≥ 0,010 % (by weight) per substance. In addition, any EU Ecolabel detergent pProducts marked as "mild/sensitive" shall only use fragrance formulations that do not contain any ingoing substances that are classified as category 1 skin sensitisers (H317), category 1 respiratory sensitisers (H334) or fragrance allergens included in Annex III to Regulation (EC) No. 1223/2009 ~~be fragrance-free.~~
HDD	Fragrances shall not be used in hand dishwashing detergents for professional use.
IIDD	Industrial and institutional dishwasher products shall not contain any fragrances.
DD, HDD, HSC, IILD, LD	*Assessment and verification:* the applicant shall provide a signed declaration of compliance, supported by a signed declaration of compliance from the supplier or fragrance manufacturer, as appropriate, a certificate of conformity to the IFRA Standards, safety data sheets for any fragrance formulations used and calculations, if necessary, to demonstrate compliance with the 0,010 % thresholds for Annex II and Annex III fragrance substances present in the detergent product ~~for Table 13-1 or Annex II fragrance substances.~~
IIDD	*Assessment and verification:* the applicant shall provide a signed declaration of compliance with the non-use of fragrances, supported by signed declarations of the non-use of fragrances from their suppliers.

4. Criterion Excluded and Restricted substances (d) Fragrances

Annex II (Regulation (EC) No 1223/2009) fragrance substances excluded as ingoing substances in fragrance formulations

TR1 proposal: Fragrances which are prohibited according to Annex II to the Cosmetics Regulation shall not be present in EU Ecolabel products in concentrations ≥ 0,010 % (by weight) per substance.

Analysis of SDSs: 15 fragrances formulation. A total of 212 substances declared

Key Findings from Analysis:

- Most substances fall below the 0.010% concentration
- Unlikely to be restricted by Annex II restrictions for EU Ecolabel detergents

Identified Inconsistency:

- Substances banned in cosmetics permitted in EU Ecolabel detergents up to 0.010%

New proposal

Fragrance substances which are prohibited in cosmetics products according to Annex II to Regulation (EC) No 1223/2009 shall not be added as ingoing substances to fragrance formulations used in EU Ecolabel detergent products.

TR2 Proposed sub-criterion (d) fragrances	
DD, HDD, HSC, IILD, LD	~~Products marked as "mild/sensitive" shall be fragrance-free.~~ ~~Substances listed under Table 13-1 of the SCCS opinion on 'Fragrance allergens in cosmetic products' ([360]) shall not be present in EU Ecolabel products in concentrations higher than 0,010% (by weight) per substance.~~ ~~Fragrances which are prohibited according to Annex II to the Cosmetics Regulation ([361]) shall not be present in EU Ecolabel products in concentrations ≥ 0,010 % (by weight) per substance.~~ Any ingoing substance added to the product as a fragrance shall be manufactured and handled following the code of practice of the International Fragrance Association (IFRA) ([362]). For such ingoing substances, the recommendations of the IFRA Standards concerning prohibition, restricted use and specified purity criteria for substances shall be followed by the fragrance formulator~~-manufacturer~~. Fragrance substances which are prohibited in cosmetics products according to Annex II to Regulation (EC) No 1223/2009 ([363]) shall not be added as ingoing substances to fragrance formulations used in EU Ecolabel detergent products. Fragrance substances restricted in cosmetics products according to Annex III to the ~~C~~cosmetics Regulation (EC) No 1223/2009 shall not be present in EU Ecolabel detergent products in concentrations ≥ 0,010 % (by weight) per substance. In addition, any EU Ecolabel detergent pProducts marked as "mild/sensitive" shall only use fragrance formulations that do not contain any ingoing substances that are classified as category 1 skin sensitisers (H317), category 1 respiratory sensitisers (H334) or fragrance allergens included in Annex III to Regulation (EC) No. 1223/2009 ~~be fragrance-free~~.
HDD	Fragrances shall not be used in hand dishwashing detergents for professional use.
IIDD	Industrial and institutional dishwasher products shall not contain any fragrances.
DD, HDD, HSC, IILD, LD	*Assessment and verification:* the applicant shall provide a signed declaration of compliance, supported by a signed declaration of compliance from the supplier or fragrance manufacturer, as appropriate, a certificate of conformity to the IFRA Standards, safety data sheets for any fragrance formulations used and calculations, if necessary, to demonstrate compliance with the 0,010 % thresholds for Annex II and Annex III fragrance substances present in the detergent product ~~for Table 13-1 or Annex II fragrance substances~~.
IIDD	*Assessment and verification:* the applicant shall provide a signed declaration of compliance with the non-use of fragrances, supported by signed declarations of the non-use of fragrances from their suppliers.

4. Criterion Excluded and Restricted substances (d) Fragrances

Replaced reference from Table 13-1 of SCCS opinion to Annex III of the Cosmetics Regulation

Analysis: Cross-checked Annex III fragrance substances with ECHA C&L inventory for any associated hazard codes

Key Findings from Analysis:

Some fragrance allergens in Annex III also have CMR classification:

- Methyl 2-hydroxybenzoate (Methyl Salicylate)
- Cinnamomum zeylanicum bark oil
- Jasminum Grandiflorum Flower Extract;Jasminum Officinale Oil; Jasminum Officinale Flower Extract
- Laurus Nobilis Leaf Oil
- Rosa Damascena Flower Oil; Rosa Damascena Flower Extract
- Rosa Centifolia Flower Oil; Rosa Centifolia Flower Extract

Possible solution

Implement a blanket ban on CMR substances as ingoing substances in fragrance formulations

TR2 Proposed sub-criterion (d) fragrances	
DD, HDD, HSC, IILD, LD	~~Products marked as "mild/sensitive" shall be fragrance-free.~~ ~~Substances listed under Table 13-1 of the SCCS opinion on 'Fragrance allergens in cosmetic products' ([360]) shall not be present in EU Ecolabel products in concentrations higher than 0,010% (by weight) per substance.~~ ~~Fragrances which are prohibited according to Annex II to the Cosmetics Regulation ([361]) shall not be present in EU Ecolabel products in concentrations ≥ 0,010 % (by weight) per substance.~~ Any ingoing substance added to the product as a fragrance shall be manufactured and handled following the code of practice of the International Fragrance Association (IFRA) ([362]). For such ingoing substances, the recommendations of the IFRA Standards concerning prohibition, restricted use and specified purity criteria for substances shall be followed by the fragrance formulator manufacturer. Fragrance substances which are prohibited in cosmetics products according to Annex II to Regulation (EC) No 1223/2009 ([363]) shall not be added as ingoing substances to fragrance formulations used in EU Ecolabel detergent products. Fragrance substances restricted in cosmetics products according to Annex III to the Cosmetics Regulation (EC) No 1223/2009 shall not be present in EU Ecolabel detergent products in concentrations ≥ 0,010 % (by weight) per substance. In addition, any EU Ecolabel detergent pProducts marked as "mild/sensitive" shall only use fragrance formulations that do not contain any ingoing substances that are classified as category 1 skin sensitisers (H317), category 1 respiratory sensitisers (H334) or fragrance allergens included in Annex III to Regulation (EC) No. 1223/2009 ~~be fragrance-free.~~
HDD	Fragrances shall not be used in hand dishwashing detergents for professional use.
IIDD	Industrial and institutional dishwasher products shall not contain any fragrances.
DD, HDD, HSC, IILD, LD	*Assessment and verification:* the applicant shall provide a signed declaration of compliance, supported by a signed declaration of compliance from the supplier or fragrance manufacturer, as appropriate, a certificate of conformity to the IFRA Standards, safety data sheets for any fragrance formulations used and calculations, if necessary, to demonstrate compliance with the 0,010 % thresholds for Annex II and Annex III fragrance substances present in the detergent product. ~~for Table 13-1 or Annex II fragrance substances.~~
IIDD	*Assessment and verification:* the applicant shall provide a signed declaration of compliance with the non-use of fragrances, supported by signed declarations of the non-use of fragrances from their suppliers.

4. Criterion Excluded and Restricted substances
(d) Fragrances

Points for discussion 12 – Fragrances

Stakeholders are invited to reply the following consultation question:

- Question 57 (**Q57) –** Do you think there should be a specific ban on CMRs as ingoing substances in fragrances? If not, then why?
- Question 58 (**Q58)** – Do you think that Annex II substances should be banned in fragrance formulations used in EU Ecolabel detergents?
- Question 59 (**Q59)** – Please, share any other comments/suggestions you deem relevant about this criterion providing reasons supporting them.

4. Criterion Excluded and Restricted substances
(e) Preservatives

TR2 Proposed sub-criterion (e) preservatives	
ALL	(i) The product may only include preservatives in order to preserve the product, and in the appropriate dosage for this purpose alone. This does not refer to surfactants which may also have biocidal properties. The only types of preservatives permitted shall be those that are compliant with Regulation (EU) No 528/2012.* (ii) The product may contain preservatives provided that they are not bio-accumulating. A preservative is considered to be not bio-accumulating if the BCF is < 100 ~~500~~ or log K_{ow} is < 3,0 ~~4.0~~. If both the BCF and log K_{ow} values are available, the highest measured BCF value shall be used. (iii) It is prohibited to claim or suggest on the packaging or by any other communication that the product has an antimicrobial or disinfecting effect. *Note: *For products originating in the Union, it is reminded that it is not sufficient that the active substances contained in the preservative product are approved under Regulation (EU) No 528/2012 for product type 6 (PT6) (in-can preservative), but the preservative product must be authorised under Regulation (EU) No 528/2012 for PT6 or made available on the market according to the transitional measures set out in Article 89(2) of that Regulation.*

4. Criterion Excluded and Restricted substances (e) Preservatives

- Question 60 (**Q60) –** Do you support the proposal to amend the criteria so that BCF and/or log Kow values do not need to be measured experimentally by each raw material supplier, and instead can rely on existing data from the ECHA substance database? Please share your thoughts and any potential implications you foresee with this approach
- Question 61 (**Q61)** – Please, share any other comments/suggestions you deem relevant about this criterion providing reasons supporting them.

4. Criterion Excluded and Restricted substances
(f) Colouring agents

TR2 Proposed sub-criterion (f) colouring agents	
DD, LD	Colouring agents shall not be used in the product.
HDD, HSC	Colouring agents shall only be used in products marketed as professional products.
~~ALL~~ IILD, IIDD HDD (professional) HSC (professional)	Colouring agents in the product shall not be bio-accumulating. A colouring agent is considered not bio-accumulating if the BCF is < 100~~500~~ or log K_{ow} is < 3,0~~-4,0~~. If both the BCF and log K_{ow} values are available, the highest measured BCF value shall be used. In the case of colouring agents approved for use in food, it is not necessary to submit documentation of bio-accumulation potential.

4. Criterion Excluded and Restricted substances
(f) Colouring agents

- Question 62 (**Q62)** – Do you support the ban of colouring agents for all consumer products and the thresholds to consider a colouring agent not bio-accumulating for HSC (professional only), IILD and IIDD?
- Question 63 (**Q63) -** To better assess the necessity of allowing colorants in professional detergent products, could you provide information on any mandatory regulations in your region that require the use of color coding for safety or operational compliance?

4. Sub-criterion Excluded and Restricted substances Microorganisms

In TR1: Scope (LD); Shell-life (units, log-scale); solely QPS not definitive proof of safety.

Sub- AHWG MCP


Revision of the EU Ecolabel criteria for
DETERGENT AND CLEANING PRODUCTS
25 June 2024

Revision of the EU Ecolabel criteria for
DETERGENT AND CLEANING PRODUCTS
01 October 2024

European Commission | EUROPEAN COMMISSION

Revision of the EU Ecolabel criteria for detergent and cleaning products

Background paper displaying discussions and feedback received during the working sub-group (sub-AHWG) on
Microbial Containing Products (MCP)

This background document aims to provide the context and the content on the discussion points addressed during the MCP working sub-group lifetime (1st and 2nd meeting)

TR2 changes overview:

- **Identification –** Whole Genome Sequencing (WGS) following EFSA's Guidance document
- **Safety –** risk assessment & minimum elements required
- **Absence of contaminants -** requirement to show how this is carried out or that there is low risk + pathogenic microorganisms (MO) testing (inclusive Revised Det. Reg)
- **Hazards –** antimicrobial production and toxigenicity/pathogenicity added to antibiotic susceptibility via "qualifications" according to EFSA's guidance.
- **Shelf-life & microbial counts –** alternative methods usable; no fixed decrease of MO counts per year.
- **Claims** – also on performance, verified via testing
- **User information** – use or special precautions (eg. RA) required; it potentially unlocks use of spray format and products used in contact with food surfaces.

Main streams of evidences:

- Stakeholders exchanges (i.e. sub- AHWG MCP);
- Literature (scientific; industry reports).

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4. Sub-criterion Excluded and Restricted substances Microorganisms – **(i) Identification**

(i) Identification:

- all intentionally added micro-organisms shall ~~have an American Type Culture Collection (ATCC) number,~~ belong to or be deposited in a collection of an International Depository Authority (IDA) and be maintained by the culture collection for the authorised period of the EU ecolabel license.

- all intentionally added micro-organisms shall be identified and characterised using whole genome sequence (WGS) analysis according to *"EFSA Guidance on the characterisation of microorganisms used as feed additives or as production organisms antimicrobial"* ([374]). ~~or have had their DNA identified in accordance with a 'Strain identification protocol'. using 16S ribosomal DNA sequencing or an equivalent method.~~

- the following taxonomic information shall be provided considering the latest published information in the International Codes of Nomenclature (ICN): genus, species and strain name or code.

Available within & linked to **EUEL timing**.

WGS as affordable "superior" technique (i.e. unequivocal MO identification; functional traits characterization

Assessment & Verification

(i) Per microorganism in the product:

- a valid certificate of deposition from the collection, specifying the accession number under which the strain is held.

- the taxonomic information: genus, species and strain name or code ~~name (to the strain)~~ and;

- identification ~~of all micro-organisms contained in the product~~ with ~~ATCC or~~ IDA numbers or documentation on DNA identification.

- Documentation about the minimum set of information for WGS analysis, in accordance with section 2.1.1 of *"EFSA Guidance on the characterisation of microorganisms used as feed additives or as production organisms antimicrobial"* ([379]),

[1] EFSA Panel on Additives and Products or Substances used in Animal Feed (FEEDAP), G. Rychen, G. Aquilina, G. Azimonti, V. Bampidis, M. de L. Bastos, G. Bories, et al., '**Guidance on the Characterisation of Microorganisms Used as Feed Additives or as Production Organisms**', EFSA Journal, Vol. 16, No. 3, March 2018. DOI: 10.2903/j.efsa.2018.5206

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4. Sub-criterion Excluded and Restricted substances Microorganisms – **(ii) Safety**

(ii) Safety:

All intentionally added micro-organisms shall belong to Risk Group I as defined by Directive 2000/54/EC of the European Parliament and of the Council ([375]) biological agents at work,

A safety/risk assessment shall be performed:

(a) at microorganisms (strain) level;

(b) at product level under all foreseeable use conditions as claimed in the product;

(c) considering under its scope human, animal, plant and environmental health;

(d) assessing sensitization (dermal and respiratory) in addition to other relevant end-points, as identified by the safety/risk assessment;

(e) making remarks on potential effects on vulnerable groups (e.g. immunocompromised, elderly, infants, pregnant women, etc).

(f) highlighting information necessary for end-user to enable safer use.

For products where their foreseeable use imply contact with food-surfaces, the safety/risk assessment must additionally consider "ingestion" as exposure route. Microorganisms included in the *Qualified Presumption of Safety* (QPS) status list issued by the *European Food Safety Authority* (EFSA) are exempted from this requirement.

A **risk assessment (RA)** is **required** BUT **only key elements** specifically mentioned:

- Ingredient & product level
- Scope aligned with that for EUEL
- Requiring specific end-points (i.e. sensitization)
- Requiring assessment & communication of safety-related information.

Assessment & Verification

(ii) Documentation demonstrating that all micro-organisms belong to Risk Group I and; documentation on ~~the microbial~~ any safety/risk assessment ~~, certified by an independent third-party expert, where the risk associated with the intended use of the product is deemed as acceptable.~~ made at (a) microorganisms (strain) or (b) product level encompassing the scope mentioned in (c) and structured as *Hazard identification*, *Hazard characterisation*, *Exposure assessment*, *Risk characterisation*. The safety/risk assessments shall, at the minimum: contain information on the aspects cited in (d), (e) and (f); discuss/demonstrate why the use of such microorganism/s and/or product/s are deemed safe/of acceptable risk; and highlight areas on uncertainty and their impact on the assessment made. The structure of the assessment and the methods intended to be used to validate it (inclusive of specific claims) shall be approved beforehand by the corresponding Competent Body.

For products where their foreseeable use imply contact with food-surfaces, the safety/risk assessment must additionally refer to "ingestion" as exposure route. To be exempted from this requirement, a proof that the microorganisms belongs to the QPS list issued by EFSA, making reference to the most up to date version, shall be provided.

Flexibility on RA structure/content (not set in detail by EUEL; likely under Rev. Detergent Regulation).

Use in **food-contact surfaces** potentially conditioned to suitable RA or belonging to EFSA's QPS list

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4. Sub-criterion Excluded and Restricted substances Microorganisms – **(iii) Absence of contaminants & (iv)**

·(iii)·Absence·of·contaminants:·¶

—→ It· must· be· controlled· that· the· product· is· not· contaminated· with· unintended· microorganisms.· Alternatively,·the·product·should·present·a·low·risk·of·microbial·contamination·and/or·intended·use·according·to·the·principles·of·ISO·29621:2017[376].¶

—→ 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.¶
- → any· other· micro-organisms· listed· in· Annex· II,· section· 2.· of· Regulation· (EU)· XXXX/XXX([377]).¶

What are the **controls** in place OR the risk of contamination is low (**ISO 29621**)

ISO 29621 *Cosmetics – Microbiology – Guidelines for the risk assessment and identification of microbiologically low-risk products.*

Direct reference to relevant Annex in the revised Detergent Regulation.

Assessment & Verification

iii)· Documentation· describing· how· it· is· controlled· that· the· product· is· not· contaminated· with· pathogen·microorganisms·or·documentation·according·to·ISO·29621:2017·principles·demonstrating· that· the· product· can· be· considered· a· microbiologically· low-risk· product.· Test· documentation· demonstrating·that·the·pathogenic·micro-organisms·are·not·present·in·the·product.¶

No modification to **requirement (iv)**

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4. Sub-criterion Excluded and Restricted substances Microorganisms – **(v) Hazards identification**

(v) · Hazard/s· identification· –· All· intentionally· added· micro-organisms· shall· be· assessed· for· Aantibiotic· susceptibility,· antimicrobial· production· and· toxigenicity/pathogenicity· according· to· the· *"EFSA·Guidance·on·the·characterisation·of·microorganisms·used·as·feed·additives·or·as·production·organisms"*·([378]).·The·outcome·shall·be·"no·hazard·identified",·meaning·that·microorganisms·are:¶

—→ free·from·acquired·antibiotic·resistance·determinants·and·susceptible·to·each·of·the·five·major·antibiotic·classes·(aminoglycoside,·macrolide,·beta-lactam,·tetracycline·and·fluoroquinolones);¶

—→ shown·not·to·produce·relevant·antimicrobial·substances·and;¶ ***What does it mean?***

—→ shown· to· be· non-pathogenic/non-toxigenic.· ~~–, with· the· exception· of· intrinsic· resistance,· susceptible· in· accordance· with· the· EUCAST· disk· diffusion· method· or· equivalent.~~¶

Microorganisms· included· in· the· QPS· status· list· issued· by· EFSA· and· that· fulfil· the· qualifications· provided· by· it,· shall· be· exempt· from· the· previous· [point· *(v)*]· requirements· concerning· humans· and· animals.·¶

Assessment & Verification

(v)· Test· documentation,· in· accordance· with· *"EFSA· Guidance· on· the· characterisation· of· microorganisms· used· as· feed· additives· or· as· production· organisms· antimicrobial"*· ([380]),· demonstrating·that·all·micro-organisms·are:·¶

—→ free· from· acquired· antibiotic· resistance· ~~with· the· exception· of~~ (excluding· intrinsic· resistance)· and·susceptible·to·each·of·the·five·major·antibiotic·classes·indicated:¶

—→ Not·antimicrobial·producers·and;¶

—→ Non-pathogenic·/·non-toxigenic.·¶

To· be· exempted· from· (v)· requirements,· a· proof· that· the· microorganisms· belongs· to· the· QPS· list· issued·by·EFSA,·making·reference·to·the·most·up·to·date·version,·shall·be·provided.·In·addition,·the· associated· "qualifications"· alongside· reasoning· on· why· these· are· equivalent· to· what· EUEL· criteria· shall·be·provided.¶

Expanding to other relevant hazards (at MO level), proven via EFSA's qualifications…

… or by holding QPS list status (thus also relevant qualifications implicitly)

Question 66 (Q66) – Do you support the reference to the *"WHO List of Medically Important Antimicrobials" (WHO MIA List)* to interpret the term "*relevant*" within the criteria text when referring to antimicrobial substances? *Please, provide a reasoned response inclusive of suggestion for improvement.* MISSING – IN TR2 the proposed A&V wording is "*The term "relevant" within the clause "shown not produce relevant antimicrobial substances" should be interpreted and reported in the context of the "WHO List of Medically Important Antimicrobials" (WHO MIA List)*

Question 67 (Q67) – Would you support the substitution of the requirement "*susceptible to each of the five major antibiotic classes (aminoglycoside, macrolide, beta-lactam, tetracycline and fluoroquinolones*" by the following text from an EU technical guidance: "*Susceptibility shall be demonstrated for compounds of at least two classes of antimicrobials selected among medically important antimicrobials*". Please, provide a reasoned response.

SANTE/2020/12260. Guidance on the approval and low-risk criteria linked to antimicrobial resistance, applicable to microorganisms used for plant protection in accordance with Regulation (EC) No 1107/2009.

European Commission

4. Sub-criterion Excluded and Restricted substances Microorganisms – **(vi) Shelf-life and microbial count and (viii), (ix) Claims**

Clauses vi & vii merged

(vi) · Shelf· life· and· Mmicrobial· count:· The· minimum· shelf· life· of· a· product· shall· be· 24· months,· during·which·microorganisms·count·shall·be·guaranteed.·Pproducts·in·their·in-use·form·shall·have·a· ~~standard· plate· count· equal· to· or· greater· than~~ ≥1· ×· 10^5· colony-forming· units· (CFU)· per· ml· in· accordance·with·ISO·21149·or·ISO·4833-1:2014·or·equivalent·scientifically·recognised·method·for· the· determination· of· microorganisms'· numbers.· .The· stability· of· the· product,· assessed· at· room· temperature,·shall·be·demonstrated·by·measuring·microorganisms·count·every·12·months.¶

~~(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.¶~~

Assessment & Verification

(vi)· Test· documentation· of· CFU· per· ml· of· in-use· solution· (for· undiluted· products,· the· dilution· ratio· recommended·for·'normal'·cleaning·shall·be·used),·measured·every·12·months·for·a·product·stored· at·room·temperature,·inclusive·at·the·start·(t=·0).¶

(vi),·(ix)·and·(x)·Artwork·of·the·packaging·or·a·copy·of·the·product's·label.¤

→ No longer fixed share of microbial counts per year

→ Explicitly mentioning assessment timing.

Clauses vii & viii

(viii)· · Fitness· for· use:· the· product· shall· fulfil· all· the· requirements· set· out· in· Criterion· X6· on· fitness· for·use¶

(viii)· ~~and· A~~all· claims· made· by· the· manufacturer· on· the· actions· or· the· performance· of· the· micro-organisms· contained· in· the· product· with· appropriate· tests,· which· shall· be· ~~documented· through· verified·by·independent~~ third-party·testing.¶

→ Wording improvement

Assessment & Verification

(vii),· (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.¶

No modification to **requirement (ix)**

European Commission

4. Sub-criterion Excluded and Restricted substances Microorganisms – **(x) User information**

(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.
- use instructions or special precautions, where relevant (as identified in safety/risk assessment).

Assessment & Verification

(vi), (ix) and (x) Artwork of the packaging or a copy of the product's label.

- Use of spray & food-contact surfaces products foreseen as part of Revised Detergent Regulation.
- Risk Assessment with relevant end-points (sensitization & ingestion) + controls (eg precautionary label).
- EFSA's QPS status exempts from ingestion assessment (as already covered).

4. Sub-criterion Excluded and Restricted substances Microorganisms

Question 66 (Q66) – Do you support the reference to the *"WHO List of Medically Important Antimicrobials" (WHO MIA List*) to interpret the term "*relevant*" within the criteria text when referring to antimicrobial substances? *Please, provide a reasoned response inclusive of suggestion for improvement.* MISSING – In TR2 the proposed A&V wording is "*The term "relevant" within the clause "shown not produce relevant antimicrobial substances" should be interpreted and reported in the context of the "WHO List of Medically Important Antimicrobials" (WHO MIA List*)

Question 67 (Q67) – Would you support the substitution of the requirement "*susceptible to each of the five major antibiotic classes (aminoglycoside, macrolide, beta-lactam, tetracycline and fluoroquinolones*" by the following text from an EU technical guidance: "*Susceptibility shall be demonstrated for compounds of at least two classes of antimicrobials selected among medically important antimicrobials*". Please, provide a reasoned response.

Question 68 (Q68) – Do you consider relevant to add a requirement to verify periodically that the antimicrobial resistance profile has not varied throughout time (not only at the time of application to the EU Ecolabel award) under microorganisms' supplier industrial practice? *Please, provide a reasoned response.*

Question 69 (Q69) – Stakeholders are invited to provide comments on the general updated of this criteria on aspect not covered by previous questions. *Please, provide a reasoned response ideally containing suggestion for improvement.*

Questions / Comments?

European Commission

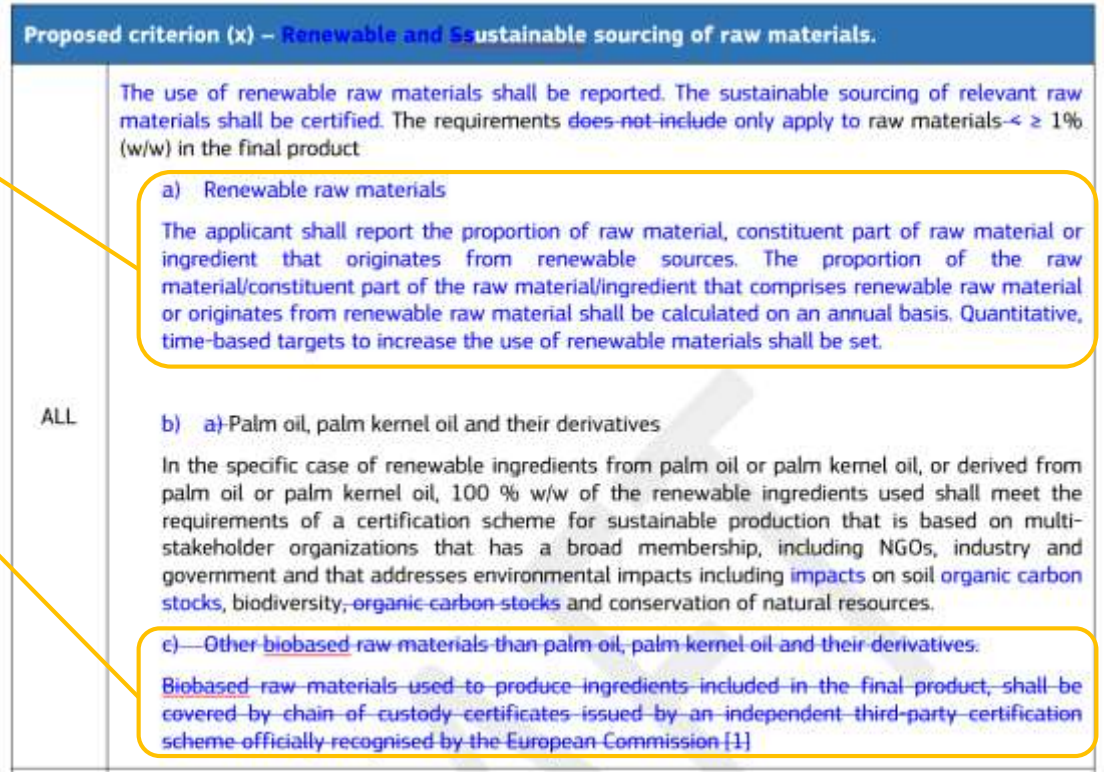
5. Criterion “Sustainable sourcing”

European Commission

5. Criterion – Renewable and sustainable sourcing of raw materials

Changes overview:

- **Name** changed
- Addition of sub-criterion on **renewable raw material content** for alignment with other **Ecolabels**
- **Sustainable sourcing** required **only for palm oil, palm kernel oil, and derivatives**, due to lack/scarcity of certification schemes for other raw materials
- **Removal** of sub-criterion on other **bio-based** raw materials



Proposed criterion (x) – Renewable and Ssustainable sourcing of raw materials.	
ALL	The use of renewable raw materials shall be reported. The sustainable sourcing of relevant raw materials shall be certified. The requirements ~~does not include~~ only apply to raw materials ~~<~~ ≥ 1% (w/w) in the final product a) Renewable raw materials The applicant shall report the proportion of raw material, constituent part of raw material or ingredient that originates from renewable sources. The proportion of the raw material/constituent part of the raw material/ingredient that comprises renewable raw material or originates from renewable raw material shall be calculated on an annual basis. Quantitative, time-based targets to increase the use of renewable materials shall be set. b) ~~a)~~ Palm oil, palm kernel oil and their derivatives In the specific case of renewable ingredients from palm oil or palm kernel oil, or derived from palm oil or palm kernel oil, 100 % w/w of the renewable ingredients used shall meet the requirements of a certification scheme for sustainable production that is based on multi-stakeholder organizations that has a broad membership, including NGOs, industry and government and that addresses environmental impacts including impacts on soil organic carbon stocks, biodiversity, ~~organic carbon stocks~~ and conservation of natural resources. ~~c) Other biobased raw materials than palm oil, palm kernel oil and their derivatives.~~ ~~Biobased raw materials used to produce ingredients included in the final product, shall be covered by chain of custody certificates issued by an independent third-party certification scheme officially recognised by the European Commission [1]~~

Main streams of evidences:

- Other ecolabels;
- Literature (various);
- Legislation;
- Comments from stakeholders.

Remarks:

- Research conducted on availability of certification schemes for bio-based raw materials other than palm oil (e.g. **coconut oil, sugarcane**).
- Clarifications and definitions of concepts related to bio-based and/or renewable raw materials and sustainable sourcing.

European Commission

5. Criterion – Renewable and sustainable sourcing of raw materials

Changes overview:

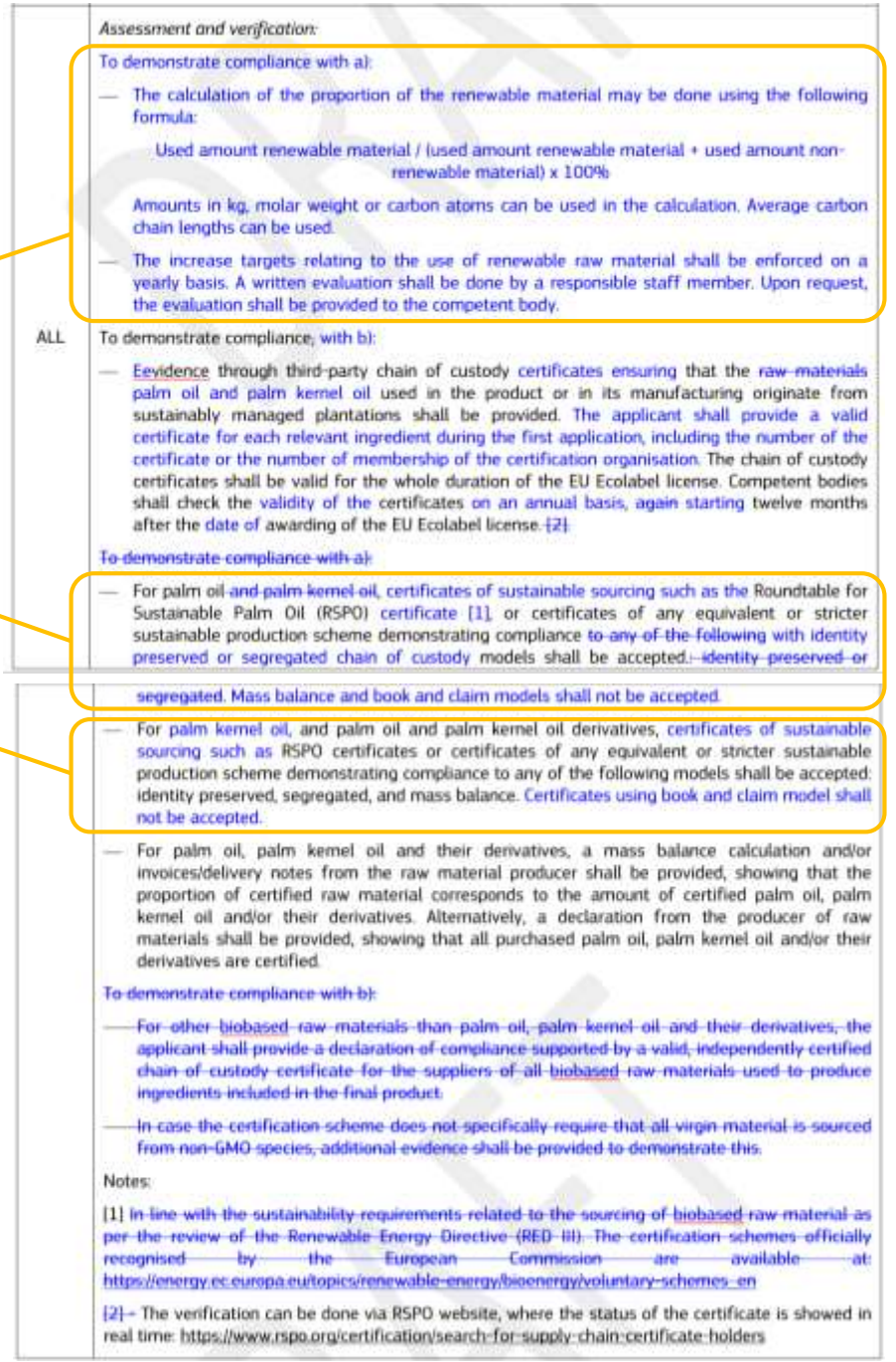
- Calculation of renewable raw material content aligned with other Ecolabels
- Chain of custody models:
  - For palm oil → **mass balance and book & claim excluded**
  - For palm kernel oil and derivatives → **book & claim excluded**

Main streams of evidences:

- Other ecolabels;
- Literature (various);
- Legislation;
- Comments from stakeholders.

Remarks:

- Close to 90% European palm oil is certified, with segregated model dominating.
- Research conducted on carbon accounting approaches and found lack of consensus to assign priority among wide range of methodologies.



Assessment and verification:

To demonstrate compliance with a):

— The calculation of the proportion of the renewable material may be done using the following formula:

Used amount renewable material / (used amount renewable material + used amount non-renewable material) x 100%

Amounts in kg, molar weight or carbon atoms can be used in the calculation. Average carbon chain lengths can be used.

— The increase targets relating to the use of renewable raw material shall be enforced on a yearly basis. A written evaluation shall be done by a responsible staff member. Upon request, the evaluation shall be provided to the competent body.

ALL

To demonstrate compliance, with b):

— Eevidence through third-party chain of custody certificates ensuring that the ~~raw materials~~ palm oil and palm kernel oil used in the product or in its manufacturing originate from sustainably managed plantations shall be provided. The applicant shall provide a valid certificate for each relevant ingredient during the first application, including the number of the certificate or the number of membership of the certification organisation. The chain of custody certificates shall be valid for the whole duration of the EU Ecolabel license. Competent bodies shall check the validity of the certificates on an annual basis, again starting twelve months after the date of awarding of the EU Ecolabel license. ~~[2]~~

~~To demonstrate compliance with a):~~

— For palm oil ~~and palm kernel oil~~, certificates of sustainable sourcing such as the Roundtable for Sustainable Palm Oil (RSPO) certificate [1], or certificates of any equivalent or stricter sustainable production scheme demonstrating compliance ~~to any of the following with identity preserved or segregated chain of custody models shall be accepted: identity preserved or segregated~~. Mass balance and book and claim models shall not be accepted.

— For palm kernel oil, and palm oil and palm kernel oil derivatives, certificates of sustainable sourcing such as RSPO certificates or certificates of any equivalent or stricter sustainable production scheme demonstrating compliance to any of the following models shall be accepted: identity preserved, segregated, and mass balance. Certificates using book and claim model shall not be accepted.

— For palm oil, palm kernel oil and their derivatives, a mass balance calculation and/or invoices/delivery notes from the raw material producer shall be provided, showing that the proportion of certified raw material corresponds to the amount of certified palm oil, palm kernel oil and/or their derivatives. Alternatively, a declaration from the producer of raw materials shall be provided, showing that all purchased palm oil, palm kernel oil and/or their derivatives are certified.

~~To demonstrate compliance with b):~~

~~— For other biobased raw materials than palm oil, palm kernel oil and their derivatives, the applicant shall provide a declaration of compliance supported by a valid, independently certified chain of custody certificate for the suppliers of all biobased raw materials used to produce ingredients included in the final product.~~

~~— In case the certification scheme does not specifically require that all virgin material is sourced from non-GMO species, additional evidence shall be provided to demonstrate this.~~

Notes:

[1] ~~In line with the sustainability requirements related to the sourcing of biobased raw material as per the review of the Renewable Energy Directive (RED II). The certification schemes officially recognised by the European Commission are available at: https://energy.ec.europa.eu/topics/renewable-energy/bioenergy/voluntary-schemes_en~~

~~[2]~~ The verification can be done via RSPO website, where the status of the certificate is showed in real time: https://www.rspo.org/certification/search-for-supply-chain-certificate-holders

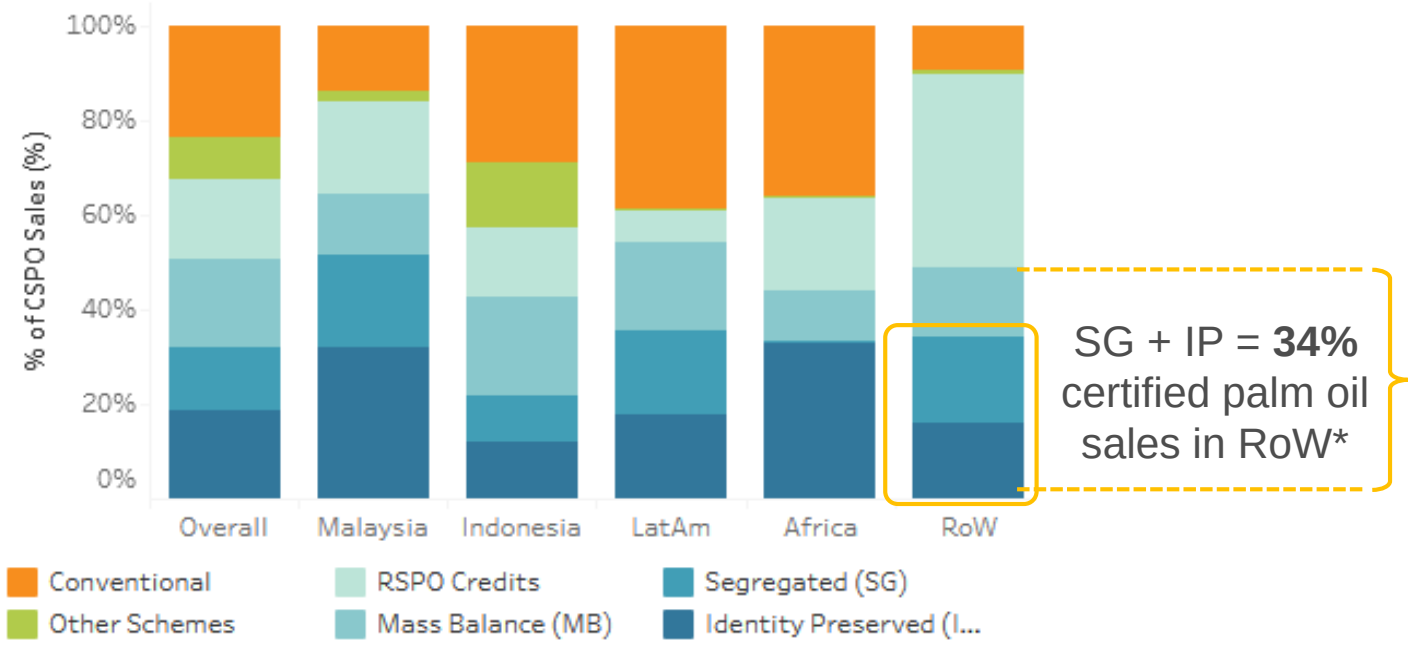
5. Criterion – Renewable and sustainable sourcing of raw materials: Chain of custody models

From TR1:

Question 21 (**Q21**) – Would you support limiting the chain of custody models to identity preserved and segregated? JRC acknowledges that evidence gathered suggested potential difficulties with compliance, thus it encourages stakeholders commenting on the feasibility of this provision.

In TR2: Is **segregated + identity preserved** supply in Europe **enough** to limit accepted chain of custody models for **palm oil**?

Figure 18. Breakdown of certified sustainable palm oil sales by supply chain model in 2023



Around 20% of global palm oil is certified palm oil

IP + SG + MB = **48%** certified palm oil sales in RoW*

Of which, 70% is SG + IP

*Rest of the World

Source: https://rspo.org/as-an-organisation/membership/acop/

European Commission

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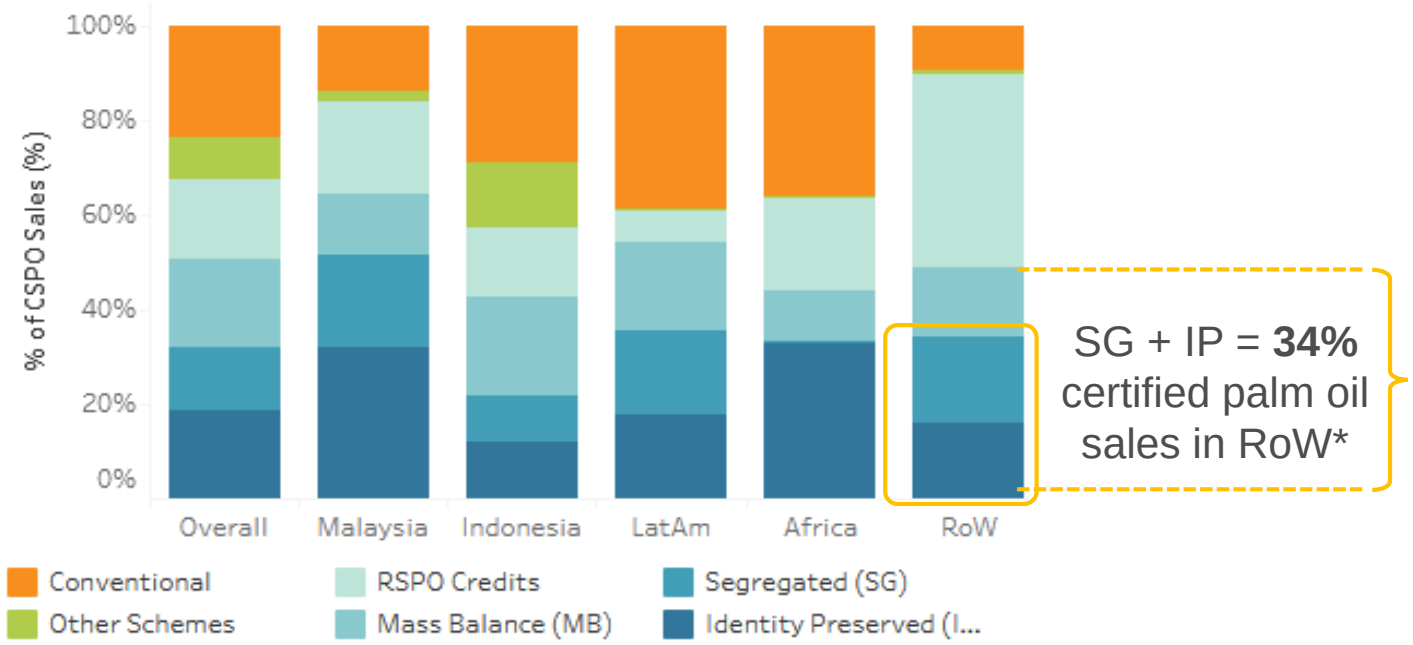
Figure 18. Breakdown of certified sustainable palm oil sales by supply chain model in 2023



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European Commission

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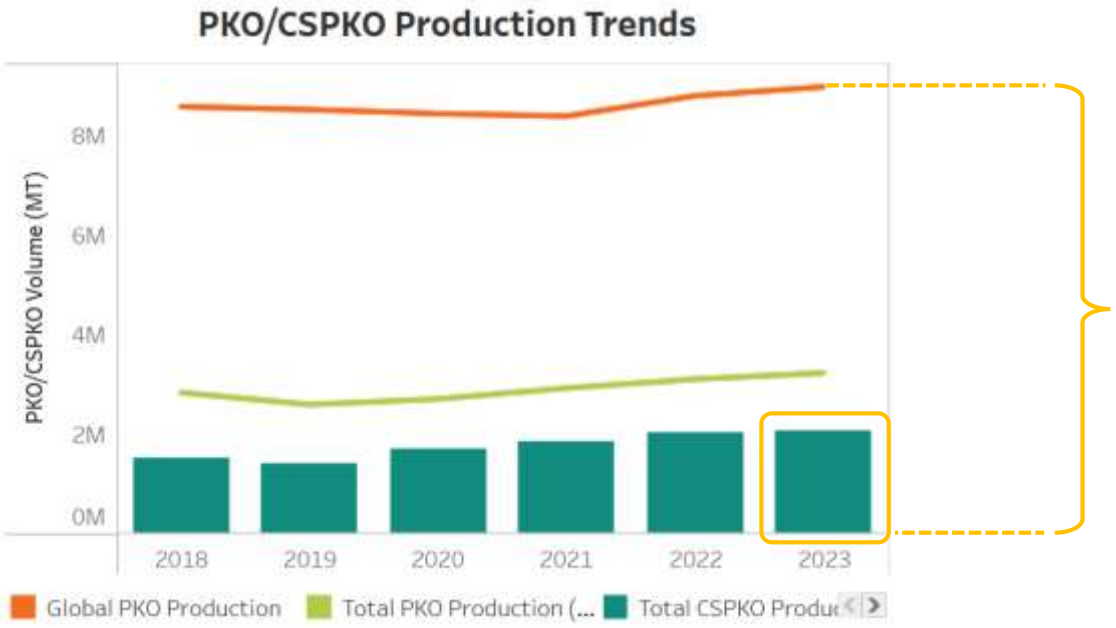
Certified palm kernel oil vs total palm kernel oil trends



Source: *https://rspo.org/as-an-organisation/membership/acop/*

Around 20% of global palm kernel oil is certified palm kernel oil

16% of global palm kernel oil is certified according to physical models, with mass balance dominating

RSPO-uptake (volume in 1,000 MT and %)	Palm oil	Palm kernel oil	Palm kernel expeller
Total	2,578 (93% uptake)	439 (62% uptake)	88 (5% uptake)
SG/IP	1,743 (67.6% of the uptake)	140 (31,80%	1 (1,44%)
MB	228 (8,8%)	245 (55,92%)	3 (3,38%)
Credits	607 (23,5% - of which 65 is Independent Smallholder Credits (IS)	53 (12,1% - of which 7 IS)	85 (95,18% - of which 7 IS)

Source: *https://www.sustainablepalmoilchoice.eu/a-mass-balancing-act/*

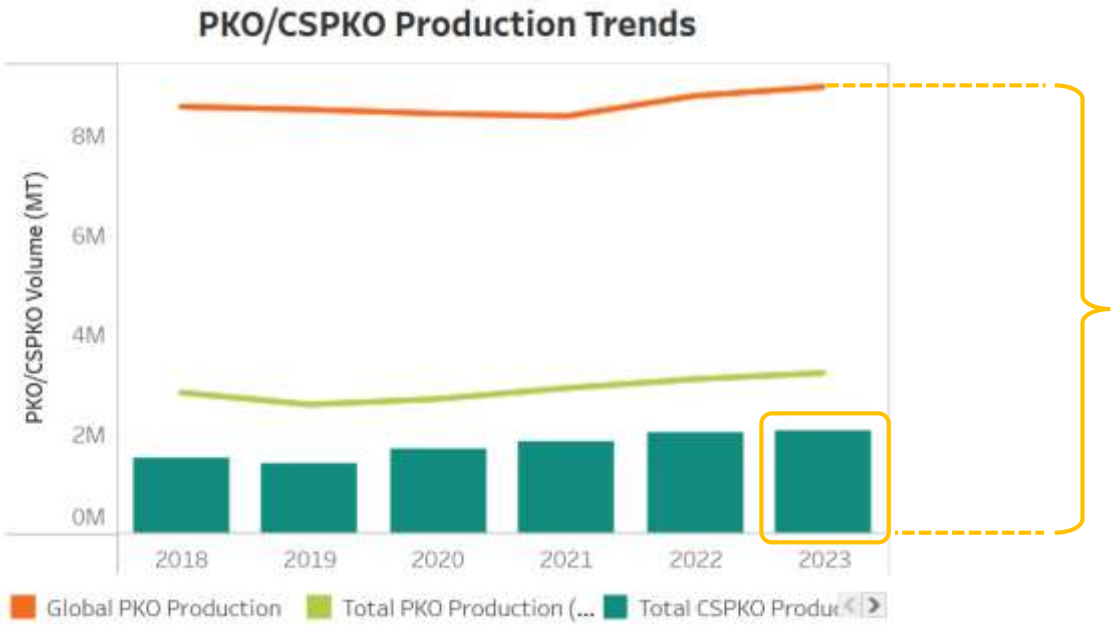
5. Criterion – Renewable and sustainable sourcing of raw materials: Chain of custody models

From TR1:

Question 21 (**Q21**) – Would you support limiting the chain of custody models to identity preserved and segregated? JRC acknowledges that evidence gathered suggested potential difficulties with compliance, thus it encourages stakeholders commenting on the feasibility of this provision.

In TR2: Is **segregated + identity preserved** supply in Europe **enough** to limit accepted chain of custody models for **palm kernel oil**? ⇒ **NO**

Certified palm kernel oil vs total palm kernel oil trends



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Source: *https://www.sustainablepalmoilchoice.eu/a-mass-balancing-act/*

5. Criterion – Renewable and sustainable sourcing of raw materials: Chain of custody models

From TR1:

Question 21 (**Q21**) – Would you support limiting the chain of custody models to identity preserved and segregated? JRC acknowledges that evidence gathered suggested potential difficulties with compliance, thus it encourages stakeholders commenting on the feasibility of this provision.

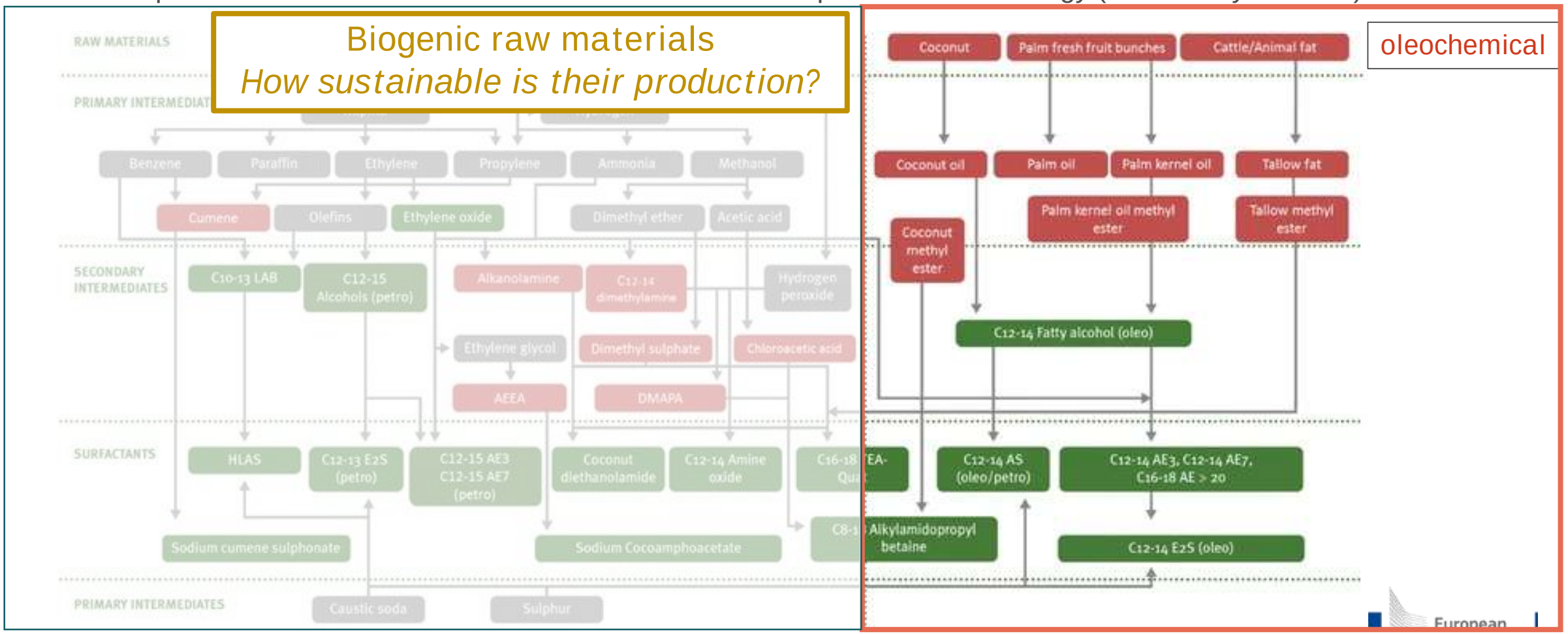
In TR2:

Question 33 (Q33) – Do you support to maintain the requirement to restrict valid chain of custody models to identity preserved and segregated for palm oil and to allow mass balance, identity preserved and segregated models for palm kernel oil?

5. Criterion – Renewable and sustainable sourcing of raw materials: Bio-based vs petrochemicals

In 1st AHWG meeting

Figure 35 – Overview of substances included in the production of commercially major surfactants and their main precursors/intermediates based on current surfactant production technology (reference year 2011).



Source: *Schowanek, D., T. Borsboom-Patel, A. Bouvy, J. Colling, J.A. de Ferrer, D. Eggers, K. Groenke, et al., 'VIP New and Updated Life Cycle Inventories for Surfactants Used in European Detergents: Summary of the ERASM Surfactant Life Cycle and Ecofootprinting Project', The International Journal of Life Cycle Assessment, Vol. 23, No. 4, April 2018, pp. 867–886. DOI 10.1007/s11367-017-1384-x*

5. Criterion – Renewable and sustainable sourcing of raw materials: Bio-based vs petrochemicals

From PR:

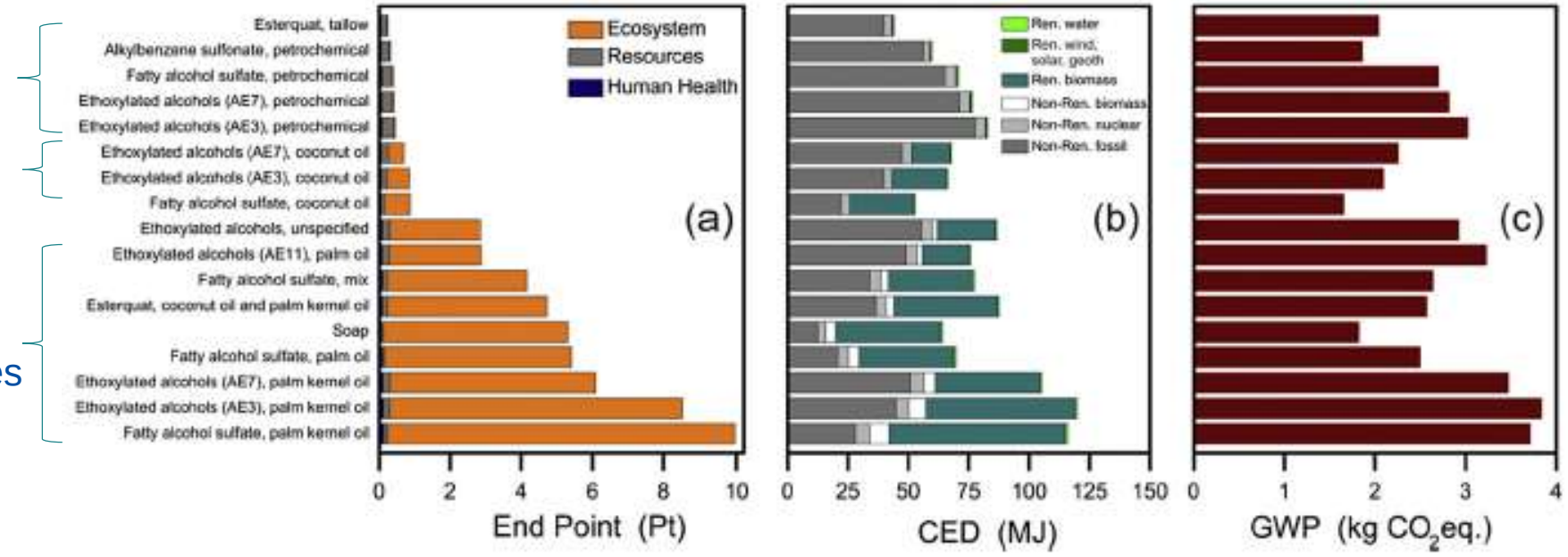
Biogenic raw materials: *How sustainable is their production?*

Petrochemicals

Coconut oil derivatives

Palm oil & palm kernel oil derivatives

Cradle-to-gate results for the production of different surfactant chemicals.



Source: Giagnorio et al., 2017.

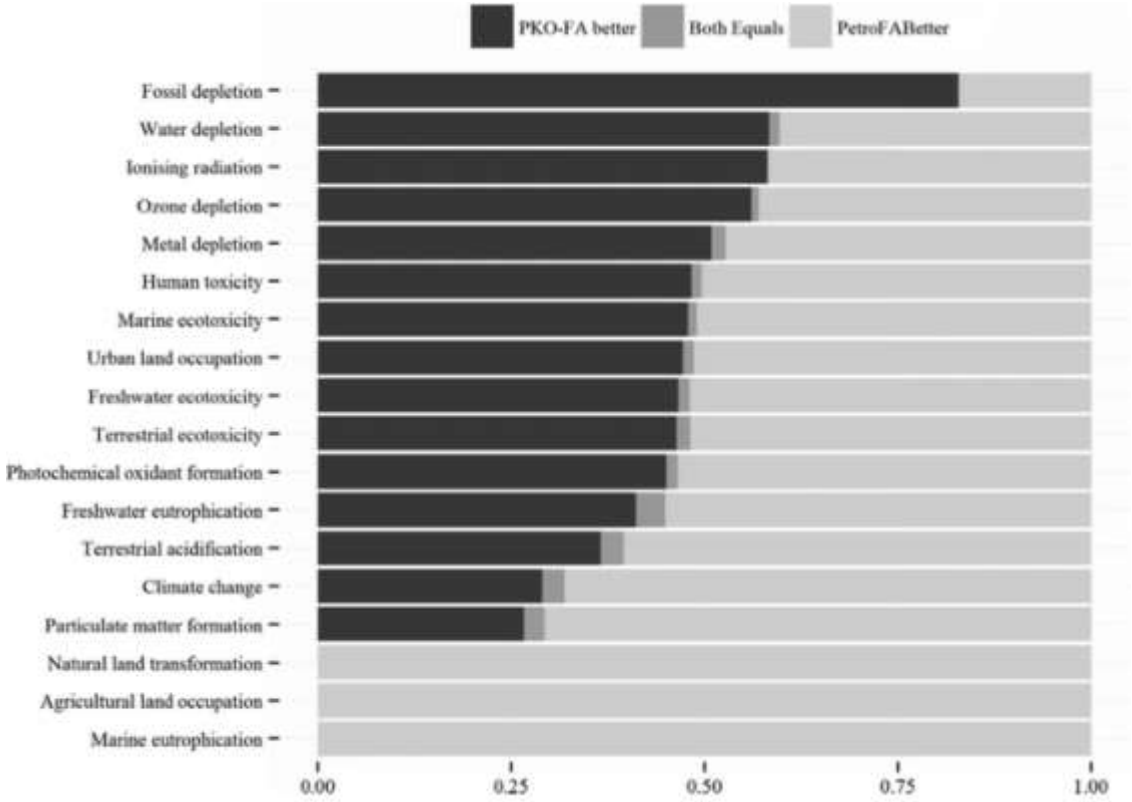
⇨ In conclusion: marginal benefits found in LCA when shifting from petrochemical to oleochemical precursors

European Commission

5. Criterion – Renewable and sustainable sourcing of raw materials: Bio-based vs petrochemicals

Biogenic raw materials: *How sustainable is their production?*

Figure 19. Comparison of environmental performance of palm kernel oil (PKO) vs petrochemical (Petro) source of fatty acids (FA) based on the results of an uncertainty analysis (1000 runs of Monte Carlo)



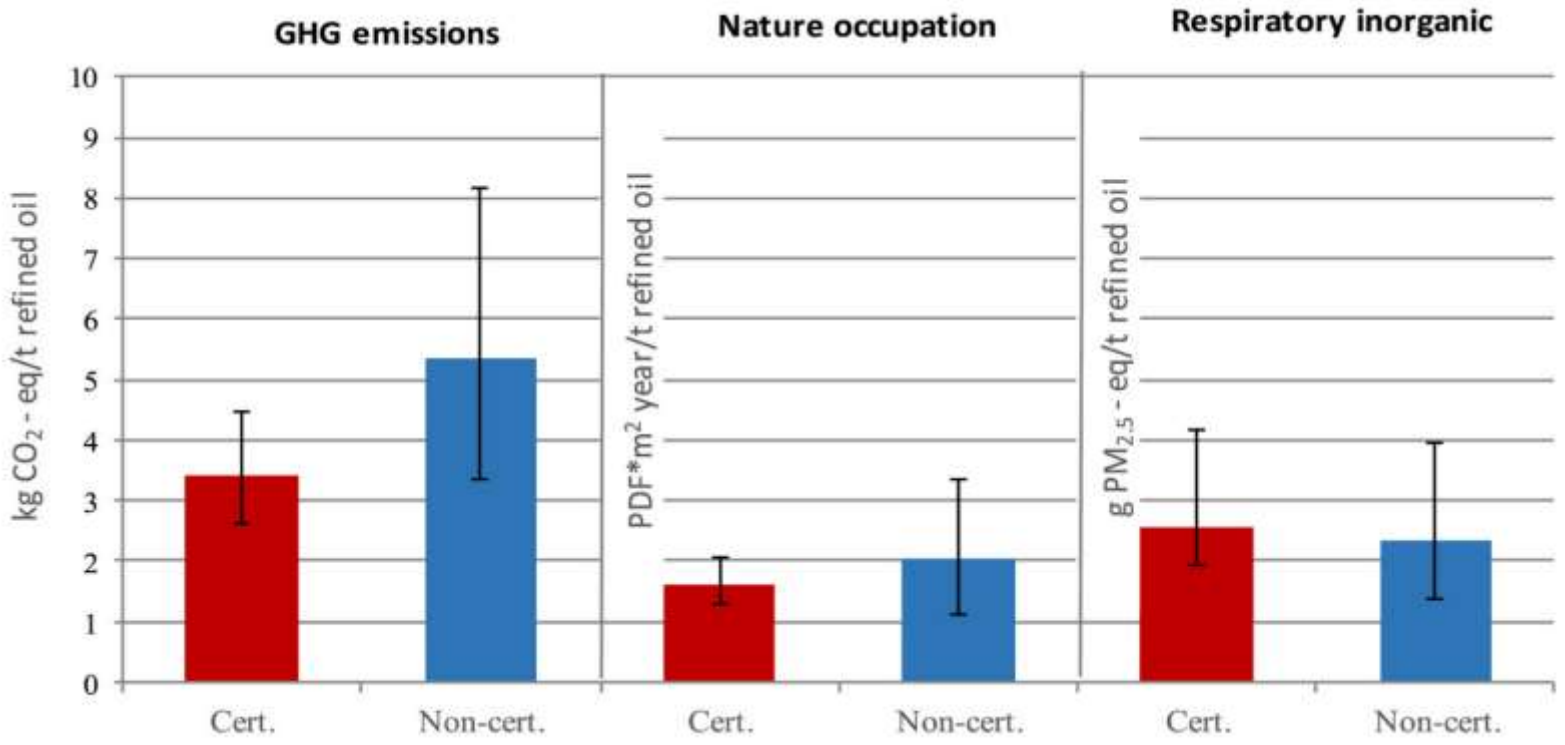
Source: Shah et al. (2016)

- Shift from petrochemicals towards bio-based ingredients does not automatically guarantee a reduction in environmental impacts.
- Improvements in categories such as resource depletion (e.g. fossils, metals, water) are likely, though sometimes marginal.
- Some impact categories such as terrestrial ecotoxicity and land use indicators may worsen depending on the conditions.
- Results dependent on conditions and operation practices.
- Some studies claim that environmental assessments of fossil feedstocks may be significantly underestimated.

European Commission

5. Criterion – Renewable and sustainable sourcing of raw materials: Bio-based vs petrochemicals

Figure 20. Comparison of environmental performance of certified vs non-certified palm oil



Source: Schmidt and De Rosa (2020)

European Commission

5. Definitions – “Bio-based material”, “Renewable material”, “Sustainable sourcing”

⇨ Sub-criterion on “other bio-based raw materials” in TR1, but clarifications needed on Definitions

Complementing *Sustainable sourcing […]* criterion	
Renewable material	*‘Renewable material’ is a material that is composed of biomass and that can be continually replenished’.*
Sustainable sourcing	*‘Sustainable sourcing’ means managing all aspects of the supply chain to source the materials, products and services an organization needs from its suppliers in a sustainable manner, that is, by ensuring that all management and operations are legal, economically viable, environmentally appropriate and socially beneficial.*
Bio-based material	Bio-based products *“are products which are wholly or partly derived from biomass”*. The term *“product”* may refer to *“an* intermediate, material, semifinished *or final product”*. Bio-based materials may either occur naturally or be synthesized by undergoing physical, chemical or biological treatments.

Included in the legal text

Question 11 (Q11 – Other) – Provide comments that you deem relevant to any aspect of the *Definitions* section.

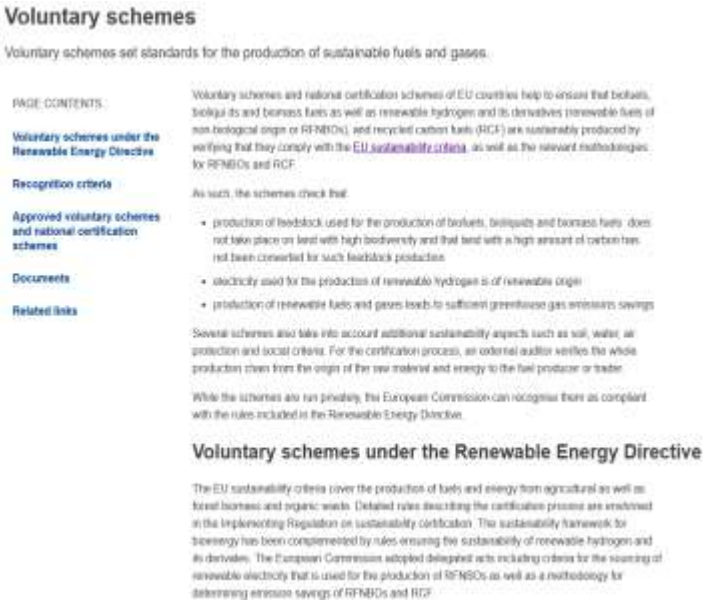
Not included in the legal text (because sub-criterion on “other bio-based raw materials” removed)

European Commission

5. Criterion – Renewable and sustainable sourcing of raw materials: Other bio-based raw materials

In TR1

Other biogenic renewable raw materials



Voluntary schemes

Voluntary schemes set standards for the production of sustainable fuels and gases.

PAGE CONTENTS

Voluntary schemes under the Renewable Energy Directive

Recognition criteria

Approved voluntary schemes and national certification schemes

Documents

Related links

Voluntary schemes and national certification schemes of EU countries help to ensure that biofuels, bioliquids and biomass fuels as well as renewable hydrogen and its derivatives (renewable fuels of non-biological origin or RFNBOs), and recycled carbon fuels (RCF) are sustainably produced by verifying that they comply with the EU sustainability criteria, as well as the relevant methodologies for RFNBOs and RCF.

As such, the schemes check that:

- production of feedstock used for the production of biofuels, bioliquids and biomass fuels does not take place on land with high biodiversity and that land with a high amount of carbon has not been converted for such feedstock production
- electricity used for the production of renewable hydrogen is of renewable origin
- production of renewable fuels and gases leads to sufficient greenhouse gas emissions savings

Several schemes also take into account additional sustainability aspects such as soil, water, air protection and social criteria. For the certification process, an external auditor verifies the whole production chain from the origin of the raw material and energy to the fuel producer or trader.

While the schemes are run privately, the European Commission can recognise them as compliant with the rules included in the Renewable Energy Directive.

Voluntary schemes under the Renewable Energy Directive

The EU sustainability criteria cover the production of fuels and energy from agricultural as well as forest biomass and organic waste. Detailed rules describing the certification process are enshrined in the Implementing Regulation on sustainability certification. The sustainability framework for bioenergy has been complemented by rules ensuring the sustainability of renewable hydrogen and its derivates. The European Commission adopted delegated acts including criteria for the sourcing of renewable electricity that is used for the production of RFNBOs as well as a methodology for determining emission savings of RFNBOs and RCF.

https://energy.ec.europa.eu/topics/renewable-energy/bioenergy/voluntary-schemes_en

In TR2

Table 42 - Overview of sustainability certification schemes for relevant bio-based products

Standard	Foundation	Certification	Principal focus of standard	Supply chain coverage	Chain of custody model	Number of certificate holders[42]	Geographical coverage	Consumer label on packaging	Approved by EU under RED II [43]	Relevance for bio-based materials for detergents and cleaning products
Better Biomass	2011	Yes	Energy, fuels and bio-based products	All elements of the supply chains. Biomass production, feedstock processing, intermediary and final product production	Mass balance and segregation	172 valid certificates [44]	Global	Yes	Yes	Low
Bonsucro	2009	Yes	All sugarcane products and derivatives – sugar, ethanol, molasses, and bagasse in traditional and newer market sectors, from sugar and alcohol to biofuels and bioplastics	Production, processing and trade around the world	Mass balance	264 valid certificates [45]	Global	Yes	Yes	Intermediate
Forest Stewardship Council (FSC) forest	1993	Yes	Forestry and wood based manufactured products	Whole supply chain from production to manufacturing, distribution	Segregation	63 834 chain of custody certificates	Global	Yes	No	Low
						certificates [46]				
International Sustainability & Carbon Certification (ISCC) PLUS	2012	Yes	Biomass/bio and circular economy for food, feed, chemicals, industrial applications (e.g., plastics or packaging) and energy from renewable sources used outside of the European Union (i.e. markets that are not regulated by the RED II [47])	All elements of the supply chain	Mass balance and physical segregation	5 375 valid certificates [48]	Global	Yes	Yes	Intermediate
Rainforest Alliance Certified Coconut Oil	2018	Yes	Coconut and coconut oil	Coconut farming and coconut oil processing	Mass balance	NA	Global	No	No	High relevance but too immature
REDcert[3]	2015	Yes	Biomass for food, animal feed and as material in chemical industry	All phases – from the farmer to supply and trade	Mass balance, product segregation, identity preserved and book & claim	143 valid certificates, with 64 of them corresponding to chemical industry [49]	Mainly Germany and Europe	Yes	No[3]	Intermediate
Roundtable on Sustainable Biomaterials (RSB) Global Advanced Products Certification	2013	Yes	Any industrial application of non-energy products such as plastics, textiles, pharmaceuticals, packaging, tableware, cosmetics, nutritional supplements, food, feed, pulp, paper and many others	All elements of the supply chains: biomass production, feedstock processing, intermediary and final product production	Mass balance, product segregation, identity preserved, content ratio accounting and book & claim	21 valid certificates [50]	Global	Yes	No[3]	Intermediate
Round Table on Responsible Soy (RTRS) Certificate	2010	Yes	Soybean and corn production and their derivatives	Full supply chain, including cultivation, harvesting, transport, storage and processing	Mass balance, segregation and country material balance	145 valid certificates [51]	Global (though most holders located in South America)	Yes	Yes	Intermediate
Sustainable Coconut Charter	2020	No	Coconut and coconut products	Aim to have full traceability to the origin	NA	NA	Global	No	No	High relevance but too immature

Certification schemes exist for some relevant bio-based raw materials

For some key raw materials (e.g. coconut oil), the certification schemes are too immature to ensure market availability

European Commission

5. Criterion – Renewable and sustainable sourcing of raw materials: Other bio-based raw materials

In TR1

Other biogenic renewable raw materials

Sub-criterion on sustainable sourcing of other bio-based raw materials replaced by sub-criterion on renewable content

https://energy.ec.europa.eu/topics/renewable-energy/bioenergy/voluntary-schemes_en

In TR2

Table 42 - Overview of sustainability certification schemes for relevant bio-based products

Standard	Foundation	Certification	Principal focus of standard	Supply chain coverage	Chain of custody model	Number of certificate holders[42]	Geographical coverage	Consumer label on packaging	Approved by EU under RED II [43]	Relevance for bio-based materials for detergents and cleaning products
Better Biomass	2011	Yes	Energy, fuels and bio-based products	All elements of the supply chains. Biomass production, feedstock processing, intermediary and final product production	Mass balance and segregation	172 valid certificates [44]	Global	Yes	Yes	Low
	2009	Yes	All sugarcane products and derivatives – sugar, ethanol, molasses, and bagasse in traditional and newer market sectors, from sugar and alcohol to biofuels and bioplastics	Production, processing and trade around the world	Mass balance	264 valid certificates [45]	Global	Yes	Yes	Intermediate
Forest Stewardship Council (FSC) forest	1993	Yes	Forestry and wood based manufactured products	Whole supply chain from production to manufacturing, distribution	Segregation	63 834 chain of custody certificates certificates [46]	Global	Yes	No	Low
International Sustainability & Carbon Certification (ISCC) PLUS	2012	Yes	Bioeconomy and circular economy for food, feed, chemicals, industrial applications (e.g., plastics or packaging) and energy from renewable sources used outside of the European Union (i.e. markets that are not regulated by the RED II [47])	All elements of the supply chain	Mass balance and physical segregation	5 375 valid certificates [48]	Global	Yes	Yes	Intermediate
Rainforest Alliance Certified Coconut Oil	2018	Yes	Coconut and coconut oil	Coconut farming and coconut oil processing	Mass balance	NA	Global	No	No	High relevance but too immature
REDcert[2]	2015	Yes	Biomass for food, animal feed and as material in chemical industry	All phases – from the farmer to supply and trade	Mass balance, product segregation, identity preserved and book & claim	143 valid certificates, with 64 of them corresponding to chemical industry [49]	Mainly Germany and Europe	Yes	No[3]	Intermediate
Roundtable on Sustainable Biomaterials (RSB) Global Advanced Products Certification	2013	Yes	Any industrial application of non energy products such as plastics, textiles, pharmaceuticals, packaging, tableware, cosmetics, nutritional supplements, food, feed, pulp, paper and many others	All elements of the supply chains: biomass production, feedstock processing, intermediary and final product production	Mass balance, product segregation, identity preserved, content claim accounting and book & claim	21 valid certificates [50]	Global	Yes	No[3]	Intermediate
Round Table on Responsible Soy (RTRS) Certificate	2010	Yes	Soybean and corn production and their derivatives	Full supply chain, including cultivation, harvesting, transport, storage and processing	Mass balance, segregation and country material balance	145 valid certificates [51]	Global (though most holders located in South America)	Yes	Yes	Intermediate
Sustainable Coconut Charter	2020	No	Coconut and coconut products	Aim to have full traceability to the origin	NA	NA	Global	No	No	High relevance but too immature

Certification schemes exist for some relevant bio-based raw materials

For some key raw materials (e.g. coconut oil), the certification schemes are too immature to ensure market availability

European Commission

5. Criterion – Renewable and sustainable sourcing of raw materials: Other bio-based raw materials

In TR2

Question 34 (Q34) – Would you support the addition of a sub-criterion to promote sustainable sourcing of coconut oil?

Question 35 (Q35) – Would you support the addition of a sub-criterion to promote sustainable sourcing of sugarcane?

Question 36 (Q36) – Would you support the addition of a sub-criterion to promote sustainable sourcing of soybean, corn and their derivatives?

Table 42 - Overview of sustainability certification schemes for relevant bio-based products

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For some key raw materials (e.g. coconut oil), the certification schemes are too immature to ensure market availability

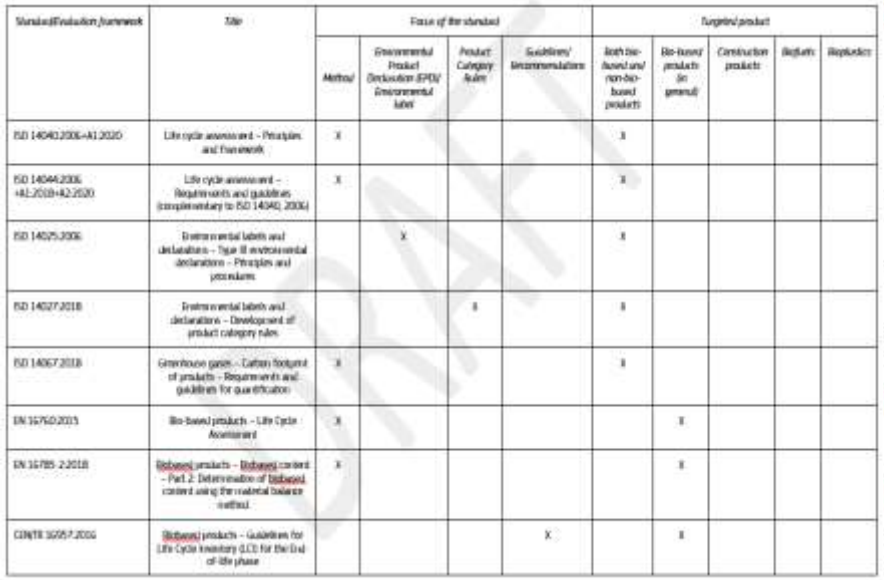
European Commission

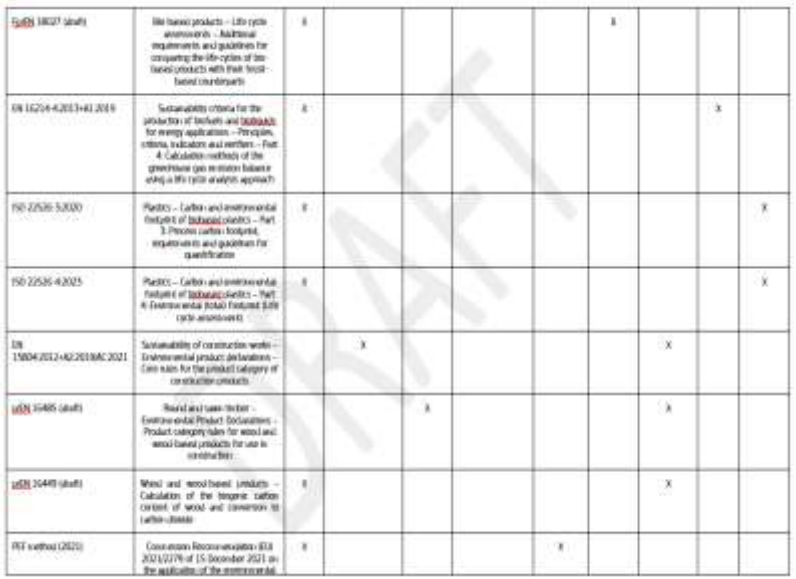
5. Criterion – Renewable and sustainable sourcing of raw materials: Carbon accounting

From TR1:

> Question 21 (**Q22**) – Would suggest considering the inclusion of specific provisions targeting achieving environmental positive effects via Carbon accounting? If so, could you share specific proposals? For example, requiring a minimum share of in carbon from renewable origin from surfactants systems (as per Blue Angel ecolabel) OR set follow a particular C-footprint methodology to ensure net LCA reduction in C-footprint in ingredients and/or final product.

In TR2: Is there a **widely accepted harmonised approach for carbon accounting** including biogenic carbon?





…

Different methods in different standards depending on

- objective,
- system boundary
- accounted flows in inventories
- temporal considerations
- …

No consensus on preferred approach

European Commission

5. Criterion – Renewable and sustainable sourcing of raw materials: Carbon accounting

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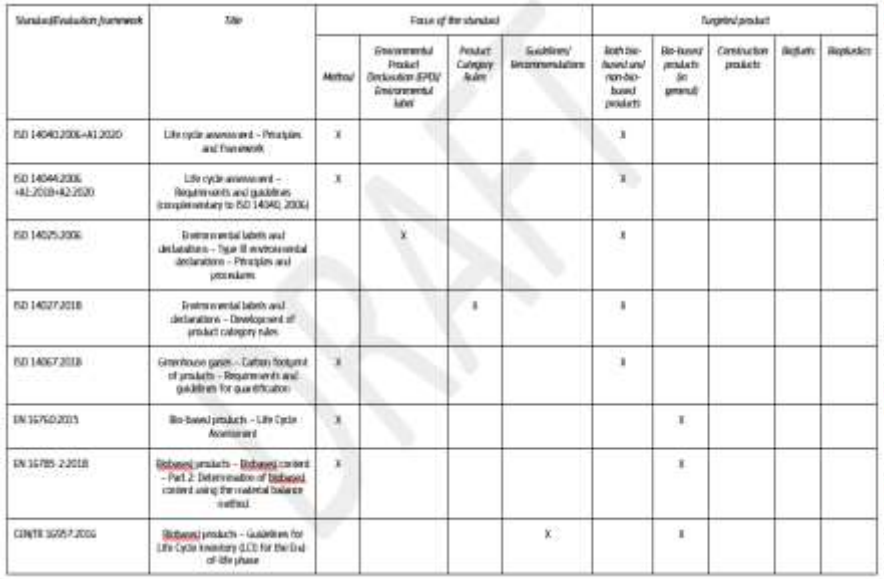
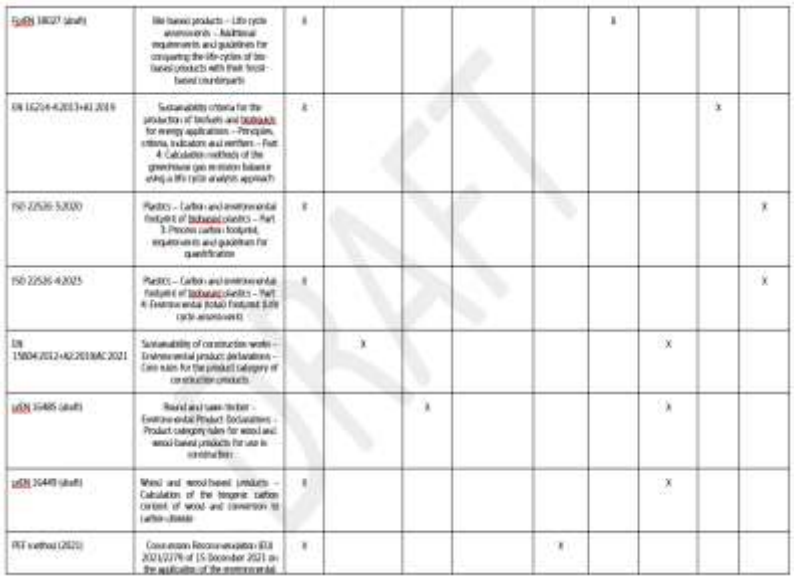
In TR2: Is there a **widely accepted harmonised approach for carbon accounting** including biogenic carbon? → **NO**





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European Commission

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In TR2: Proposal of alignment with other Ecolabels (i.e. Nordic Swan) with simple (?) accounting method:

— *Nordic Swan (NS)* requests licence holders for LD ([313]), HDD ([314]) and HSC ([315]) to report renewable material by calculating a ratio between the total amount of renewable material used divided by the sum of the amounts of renewable and non-renewable material used, with the amounts being expressed in kg, molar weight or carbon atoms, and the use of average carbon chain lengths being accepted:

$$\frac{Used\ amount\ renewable\ material}{(used\ amount\ renewable\ material + used\ amount\ non-renewable\ material)} \times 100\%$$

Question 32 (Q32) – Do you support the addition of sub-criterion a) to request applicants to commit to the increase of the share of raw material from renewable origin, following the same rationale as other European ecolabel schemes?

5. Criterion – Renewable and sustainable sourcing of raw materials

Question 32 (Q32) – Do you support the addition of sub-criterion a) to request applicants to commit to the increase of the share of raw material from renewable origin, following the same rationale as other European ecolabel schemes?

Question 33 (Q33) – Do you support to maintain the requirement to restrict valid chain of custody models to identity preserved and segregated for palm oil and to allow mass balance, identity preserved and segregated models for palm kernel oil?

Question 34 (Q34) – Would you support the addition of a sub-criterion to promote sustainable sourcing of coconut oil?

Question 35 (Q35) – Would you support the addition of a sub-criterion to promote sustainable sourcing of sugarcane?

Question 36 (Q36) – Would you support the addition of a sub-criterion to promote sustainable sourcing of soybean, corn and their derivatives??

Question 37 (Q37) – Please, share any other comment/suggestion that you deem relevant about this criterion providing reasons supporting them.

Questions / Comments?

European Commission

Revision of the EU Ecolabel criteria for
DETERGENT AND CLEANING PRODUCTS

LUNCH (1.5h). Back 14:30

ETIQUETTE FOR VIRTUAL MEETING PARTICIPANTS

- **Please indicate "NAME OF YOUR ORGANIZATION + YOUR FULL NAME"**
- **MUTE YOUR MIC AND SWITCH OFF you CAMERA (unless you have the floor)**
- **USE THE CHAT only to ask for the FLOOR (write "FLOOR" in the chat), and COMMENT only ORALLY**

Agenda

Day 2: Thursday 13th March 2025 (Afternoon)

No	Item	SCHEDULE
7.	Criterion “Fitness for use”	14:30 – 15:40
8.	Criterion “Packaging”	15:40 – 16:15
Coffee Break (15 min)		*16:15 – 16:30*
9.	Criterion “Packaging”	16:30 – 17:05
10.	Criteria “Automatic dosing systems” + "User information" + "Information on EU Ecolabel"	17:05 – 17:25
11.	Conclusions, next steps and closure of the meeting	17:25 – 17:30

European Commission

7. Criterion “Fitness for Use” (**FfU**)

European Commission

7. *FfU* criterion – performance frameworks

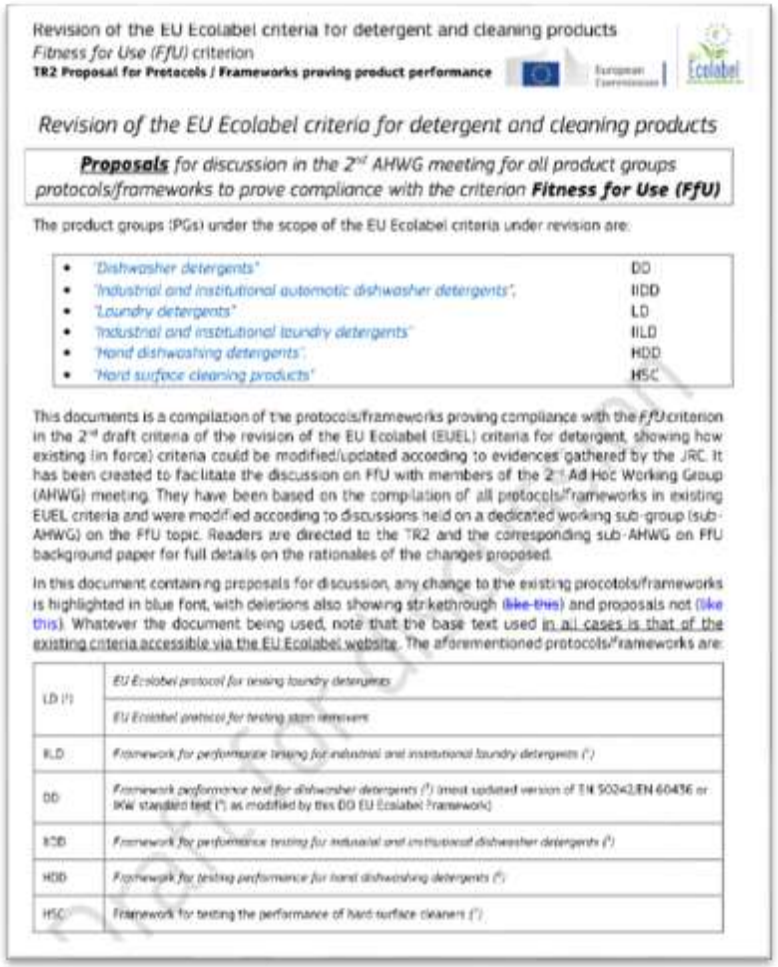
Aim – Ensuring that products perform as expected (washing/cleaning efficiency)

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

[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
[2] 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
[4] 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
[6] 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

7. FfU criterion – 2nd AHWG meeting documents

FfU performance frameworks ***compilation***



Revision of the EU Ecolabel criteria for detergent and cleaning products
Fitness for Use (FfU) criterion
TR2 Proposal for Protocols / Frameworks proving product performance

Revision of the EU Ecolabel criteria for detergent and cleaning products

Proposals *for discussion in the 2nd AHWG meeting for 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'	IILD
• 'Hand dishwashing detergents'	HDD
• 'Hard surface cleaning products'	HSC

This documents is a compilation of the protocols/frameworks proving compliance with the FfU criterion in the 2nd draft criteria of the revision of the EU Ecolabel (EUEL) criteria for detergent, showing how existing (in force) criteria could be modified/updated according to evidences gathered by the JRC. It has been created to facilitate the discussion on FfU with members of the 2nd Ad Hoc Working Group (AHWG) meeting. They have been based on the compilation of all protocols/frameworks in existing EUEL criteria and were modified according to discussions held on a dedicated working sub-group (sub-AHWG) on the FfU topic. Readers are directed to the TR2 and the corresponding sub-AHWG on FfU background paper for full details on the rationales of the changes proposed.

In this document containing proposals for discussion, any change to the existing protocols/frameworks is highlighted in blue font, with deletions also showing strikethrough (~~like this~~) and proposals not (like this). Whatever the document being used, note that the base text used in all cases is that of the existing criteria accessible via the EU Ecolabel website. The aforementioned protocols/frameworks are:

LD (1)	*EU Ecolabel protocol for testing laundry detergents*
	EU Ecolabel protocol for testing stain removers
ILD	*Framework for performance testing for industrial and institutional laundry detergents (1)*
DD	*Framework performance test for dishwasher detergents (1)* (most updated version of EN 50242/EN 60436 or IKW standard test (1), as modified by this DD EU Ecolabel framework)
IIDD	*Framework for performance testing for industrial and institutional dishwasher detergents (1)*
HDD	*Framework for testing performance for hand dishwashing detergents (1)*
HSC	*Framework for testing the performance of hard-surface cleaners (1)*

*2nd Draft Technical report (**TR2**)*

TR2 – contain rationales to proposals

Displays TR2 proposals

Supporting info to TR2

FfU background *discussion paper*

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

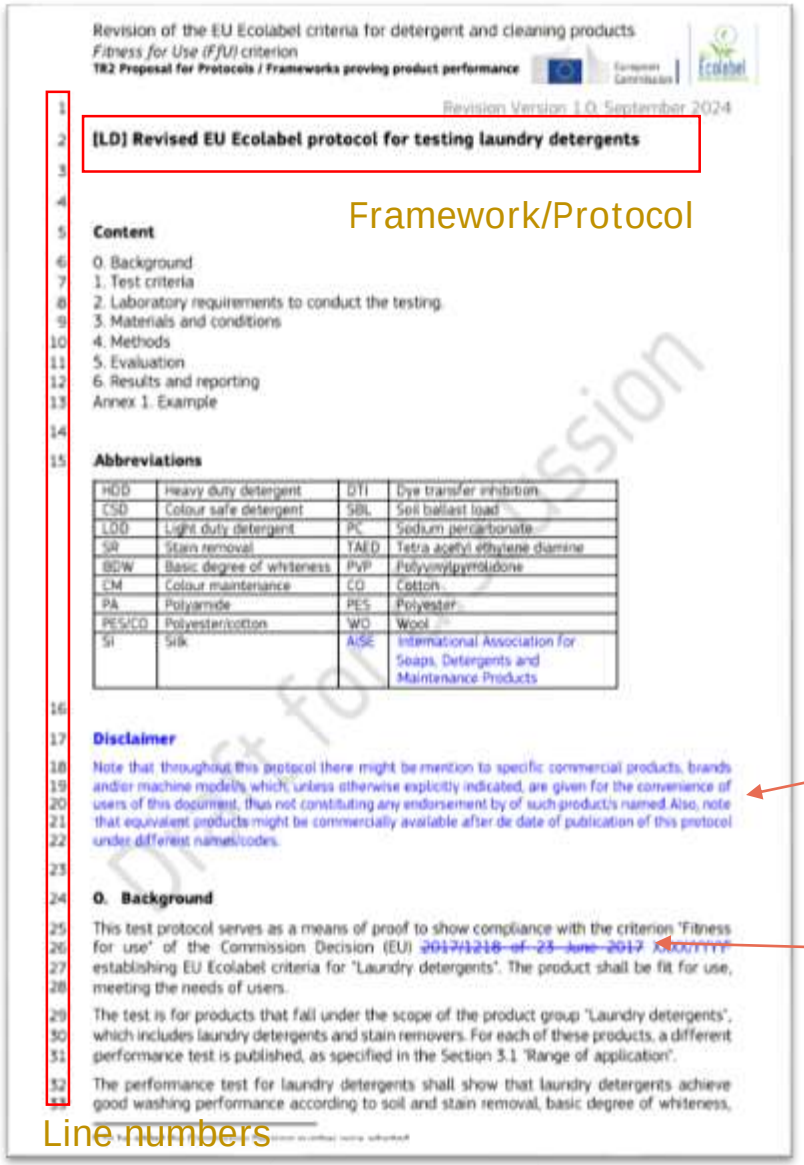
Revision of the EU Ecolabel criteria for detergent and cleaning products

Background paper displaying discussions and feedback received during the working sub-group (sub-AHWG) on
Fitness for Use (FfU)

This background document aims to provide the context and the content on the discussion points addressed during the FfU working sub-group lifetime (1st and 2nd meeting)

Draft for discussion

7. FfU criterion – FfU frameworks compilation



Revision of the EU Ecolabel criteria for detergent and cleaning products
Fitness for Use (FfU) criterion
TR2 Proposal for Protocols / Frameworks proving product performance

Revision Version 1.0, September 2024

[LD] Revised EU Ecolabel protocol for testing laundry detergents

Framework/Protocol

Content

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	AISE	International Association for Soaps, Detergents and Maintenance Products

Disclaimer

Note that throughout this protocol there might be mention to specific commercial products, brands and/or machine models which, unless otherwise explicitly indicated, are given for the convenience of users of this document, thus not constituting any endorsement by of such product/s named. Also, note that equivalent products might be commercially available after de date of publication of this protocol under different names/codes.

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~~ XXXX/YYYY 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,

Line numbers

- For ease of use.
- Contains proposals (different from existing frameworks).
- Even if content remains, might be re-located within the framework
- New text/additions displayed in blue font (Like this)
- Deletions displayed by strikethrough blue font (~~Like this~~)

European Commission

7. FfU criterion – All product groups (I)

Outline of main changes – generally pursuing harmonization of common aspects to >1 PGs

IF claimed, tested...

Any other claim made on the performance of the product (as displayed in it or in its accompanying product sheet) that is not already specified in this performance framework must also be tested via suitable methods for the function/claim specified and documented.).

A&V

In addition to the previous general reporting requirements, if a test product has any other claim on the performance the product the following requirements also apply:

- *Description of the claim made about performance as displayed in the packaging, inclusive literal wording/content used (e.g. quoting literal sentences; adding pictures).*
- *Detailed description of the test procedure/methods used for each of the performance effects tested and justification on how each is suitable/relevant for testing a specific performance effect.*

… and product safety is applicant's responsibility

In addition to the performance test, it is the responsibility of the applicant to ensure that the product is safe to use on the intended use).

European Commission

7. FfU sub-AHWG – All product groups (II)

A definition for what **market** product as **reference product (**for testing purposes) stands for -

To be considered suitable as reference detergent for the purposes of EU Ecolabel criteria compliance with performance testing (EUEL criterion Fitness for Use) and with reference to the test product applying for the EU Ecolabel award (if applicable), a market product shall:

1. *be in the same category; segment (thus end-users) and/or type (e.g. RTU/undiluted);*
2. *be well-known and part of the leaders with a sufficient sales volume;*
3. *not hold an ecolabel certification (e.g. EU Ecolabel, Nordic Swan, Blue Angel);*
4. *have the same claims - primary and (if applicable) secondary ones.*
5. *not be another product from the applicant (failing this, it must be strongly documented).*
6. *have comparable physico-chemical characteristics (e.g. pH, concentration of active substances)*

Question 96 (Q96) – Do you support the proposal made for a criteria/definition on "*market reference product"* (Please see rationale for full details, inclusive the proposal

Question 97 (Q97) – Related to Q96 and referred to the following wording on a potential definition for "*market reference product"* ("*be well-known and part of the leaders with a sufficient sales volume;"*), would you support choosing amongst the top 5 products according to sales volumes using a database? If so, which database would you suggest (e.g. NIQ)? In addition, which do you consider should the scope (e.g. European level/EU Member State/other? (Please see rationale for full discussion details.)

Question 98 (Q98) – Related to Q96 and referred to the following wording on a potential definition for "*market reference product"* ("*not hold an ecolabel certification (e.g. EU Ecolabel, Nordic Swan, Blue Angel);* would you support having exclusions to it? (Please see rationale for full discussion details.) *Please, provide a reasoned response.*

Wording & verification

Need to agree on criteria to best delimit scope/eligible products.

IF so, how to quote?

Eg. "*...unless duly justified/accepted by the Competent Body*" or "(failing this, it must be strongly documented)." or "3. Preferably, not hold an ecolabel...".

7. FfU criterion – Laundry detergent (LD)

Section (LD Protocol)	Description/Outline of the change
All/various sections	Wording improvement Inclusion of synthetics/blends as new fabric type (alignment with IEC60456 & AISE LD Protocol).
3.2 *Washing machine types*	Clarification of eligible washing machine types via specification description. Requirements added – Yearly calibration/validation (Alignment with AISE LD protocol). Requirement added – Record & monitor energy and water consumption (alignment with Nordic Swan).
3.5 *Stain set*	(Figure 1 & 3) Not recommending marking of the stains (potential colour donation). Figure 1 removed. Figure 2&3 merged
3.6 *Stain set size*	Merging with Section 3.5.
3.9 *Wash loads*	Addition of synthetics/blends as new fabric type (alignment with IEC60456 & AISE LD Protocol). Target ballast load weight slightly decreased (HDD -->4.5kg to 4.4kg; LDD ->2.5kg to 2.4kg alignment with IEC60456); Removed reference to DIN 53919 (withdrawn status).
3.11 *Reference detergent*	(Table 12) Dosage–> Updated to be coherent with criterion *Dosage* Requirement proposal (12.2 g/kg laundry) and conforming EN60456:2023 (A12) recommended detergent dose for Cotton (20C & 30C). (Table 13) The formulation for HDD has been updated from IEC-A to IEC-P formulation, conforming IEC60456, more specifically the formulation displayed in Table B.1 from the EN60456:2023 (A12). This formulation has been modified according to stakeholders' feedback, by adding further enzymes types, to better reflect the enzymatic profile of current laundry detergents in the market.
3.11 *Pre-treatment*	Clarification on the reference detergent dosage.
3.13 *Wash programme*	Matching the minimum temperature at which a LD claims to that of washing machine water inlet, since generally there are no technical means to set it at a fixed temperature lower than 20C
3.15 and 4.1.1	Ironing no longer allowed as it could be a source of test variability due to stain colour change due to heat applied.

3.11 Reference detergent

Table 13. Reference detergents

Type of detergent	Reference detergent

Regular The standard powder detergent IEC P (that can serve as reference for a detergent to wash white fabrics) is a reformulation of IEC-reference detergent A that contains percarbonate instead of perborate. This standard detergent is distributed as three separate components, that shall be stored separately (because of for proper stability of storage) , with the following composition:
- 82% IEC-P BASE base powder with enzyme and foam inhibitor (= IEC-PA* BASE powder, See table below)
- 15% sodium percarbonate
- 3% bleach activator tetra-acetylethylenediamine (TAED)

	Ingredient	% Content[1] [%, w/w]	Tolerance (+/-) [%, w/w]	CAS n.
HDD	linear sodium alkyl benzene sulfonate	9.4 ~~11.4~~	0.9 ~~0.5~~	25155-30-0
	ethoxylated fatty alcohol C_{12-14} (7EO)	5.0 ~~6.1~~	0.5 ~~0.3~~	68439-50-9
	sodium soap (tallow soap)	3.4 ~~4.2~~	0.3 ~~0.2~~	308075-99-2
	foam inhibitor concentrate (12% silicon on inorganic carrier)	4.1 ~~5.1~~	0.4 ~~0.3~~	68989-22-0
	sodium aluminium silicate zeolite 4A (80% active substance)	30.2[2] ~~36.7~~	3.0 ~~1~~	70955-01-0
	sodium carbonate	12.4 ~~15.1~~	1.2 ~~1~~	497-19-8
	sodium salt of a copolymer from acrylic and maleic acid (sokalan CP5)	2.6 ~~3.1~~	0.3 ~~0.2~~	60472-42-6
	sodium silicate ($SiO_2:Na_2O$ = 3.3:1)	3.2 ~~3.9~~	0.3 ~~0.2~~	1344-09-8
	carboxymethylcellulose	1.3 ~~1.6~~	0.1	9004-32-4
	phosphonate (25% Diethylenetriamine pentaimethylene phosphonic ~~active~~ acid)	3.0 ~~3.6~~	0.3 ~~0.2~~	22042-96-2
	protease (Savinase X.0 T)	64 KNPU/Kg[1] 0.5	6.4 KNPU/Kg[1] 0.5	9014-01-1
	Amylase (Stainzyme X.0 T)	24 SNUX/Kg[1]	2.4 SNUX/Kg[1]	9000-90-2
	Mannanase (Mannaway X.0 T)	4 MIU/Kg[1]	0.4 MIU/Kg	37288-54-3
	Lipase (Lipex X.0 T)	100 KLU/Kg[1]	10 KLU/Kg	9001-62-1
	Cellulase (Celuclean X.0 T)	2300 CNU/Kg[1]	230 CNU/Kg[1]	9012-54-8
	sodium sulfate	6.9 rest	0.7 rest	7757-82-6

[1] Enzyme activity units – e.g. KNPU/kg = Kilo Novo Protease Units per gram of sample.

REMARKS

Pending work to complete **stain removers**

LD liquid & **LDD formulations** not updated – ***Call for inputs***

Enzyme profile added to generic formulation (IEC)

Question 103 (Q103) – Would you support allowing market products as reference detergent for LD performance testing as way to keep up with market developments (e.g. novel products; new claims)? If so, would you support removing from LD protocol those generic formulations considered as outdated (no longer reflecting market reality)?

7. FfU criterion – Industrial and Institutional LD (IILD)

Section (IILD Protocol)	Description/Outline of the change
All sections	Wording improvement (inclusive of moving text to footnotes) Explicit mention to scope (covers mono- and multi-functional products) Set minimum testing conditions, namely: → Testing elements and stages defined beforehand and identical for each repetition unless justified as comparable (but not identical). → Testing carried out at medium degree of soiling → Testing according to manufacturer's recommendations, as claimed in the product (e.g. label; product sheet), specifically: • → at the lowest washing temperature and; • → at the highest water hardness and; • → at the recommended dosage considering the former aspects (lower end if a range is provided)
Section 1	Reference to standard ISO 15797:2017 as a way to standardize the washing procedure at laboratory scale, as practical compromise between real conditions at industrial scale and the laboratory.
Section 1.2	Requesting laboratory machines specifications to comply with ISO 15797:2017 as proof of suitability to generate predictive values correlated towards realistic usage conditions. Specifications explicitly include for convenience. Alternatively, approval by the Competent Body of machine specifications complying with such requirement. In terms of reference product generic formulations: → changing from IEC A to IEC P, following standard updates. → proposing the ISO 15797:2017 as suitable additional option. Explicitly add these formulations as tables for convenience. Specifications of how dosages given in ranges should be considered for testing purposes (lowest for hard water at lowest temperature claimed as effective).
Section 1.3	Assessment of performance based on testing of performance effects, classed as: → primary laundering effects (e.g. dirt removal, stain removal capacity and bleaching effect) → secondary laundering effects (e.g greying of white washing, and colour fastness and staining of coloured washing) → rinsing agent effects (e.g. drying, ironing or mangling of the washed articles), Primary laundering effects must be tested while other type of performance effects may be tested. The performance test is passed when each performance effect tested is equal or better than that of the reference product used. A performance effect is equal to or better than the reference product if: → 5 repetitions -> the results are equal to or better in 100% of the scores. → 10 repetitions -> the results are equal to or better in 80% of the scores. → Statistical methods -> alternatively to the former, an statistical test with a one-side 95% confidence range shows the results are equal to or better

<u>REMARKS (*Laboratory test)*</u>

Derived from FfU sub-AHWG:

- Generic formulations outdated/not representative.
- Testing conditions not widely applicable (e.g. textiles)
- New structure to arrange claims suggested: (See Q117)
  - *laundry detergent for any white linen and this must be marked "white linen" on the label: dirt removal and stain removal, bleaching effect and greying of white washing;*
  - *laundry detergent for any colored linen (to be tested for all laundry detergents that do not specify "white linen"): dirt removal and stain removal of colored washing, bleaching effect, greying of white washing, color maintenance and dye transfer inhibition;*
  - *any stain remover: stain removal on white and colored laundry with more difficult and different types of stains;*
  - *softener: softness, ironing (or iron glide);*
  - *rinsing agent: mangling of the washed articles;*
  - *other products: each effect should be tested.*

Question 107 (Q107) – Would you support setting structuring claims by product they refer to (See IILD TR2 rationale) rather than by the type of claim (primary/secondary; See TR2 proposal text)?

Considering also:

- Lack of specific testing methods
- Not present in other ecolabels (e.g. NS 093; v4.1);
- Laborious verification

Should laboratory test be dropped?

European Commission

7. FfU criterion – Dishwashing detergent (DD)

Section (DD Protocol)	Description/Outline of the change
All sections	Wording improvement (inclusive of moving text to footnotes) Reference to the latest IKW test/EN 60436 standard (and for the latter, removing quotation to EN 50242)
Section 2	Clarifications -> coverage (mono- & multi-functional products) + directs to section 3 for rinse performance testing. Requirement -> any other performance-related claim must be tested/documented.
Section 2.1	(Re)Moving all text making reference to rinse aid performance testing to the newly created section dedicated to rinse aid testing (See section 3). Specific reference to holding time after reaching the main wash temperature (8 minutes). Cleaning performance testing temperature is set at 45C for both reference detergent and test detergent (currently, 50C is fixed as reference detergent test temperature while tested detergent can be lower), in alignment with other ecolabelling schemes[478] and state-of-the-art literature[479]. Specific reference to standard detergent Type D Clarification of the type of dishwasher machine that can be used Requesting a minimum of three attempts.
Section 2.2	The generic formulation is as reference detergent is specified (IEC 60436, Type D) Clarification of the type of dishwasher machine that can be used
Section 3	New section (Rinse aid)— contains aspects related to rinse aid performance
	testing in existing framework protocols + new specifications mostly derived from alignment with other ecolabelling schemes[480] and stakeholders feedback.
Section 4	Structure — now it mainly disclose reporting requirements split by type of function/test, namely: cleaning performance; rinse aid performance and other claims.

REMARKS

Further work envisaged on...

… check Ref. Det. based on IEC update

… checking rinse aid proposal and…

3. Rinse aid performance

This section covers rinse aid performance of both mono-functional (rinse aid= RA) or multi-functional (detergent + rinse aid =MF) products.

The test is passed when the average test rinse performance is equal or better than the reference rinse aid (IEC 60436, Annex D, Formula III KS-C (acid)).

The performance test conditions for the reference and test rinse aid are (if not specified, applicable to RA and MF):

— Water hardness:
  - (RA) 1.42 – 1.78 mmol $CaCO_3$/l (equivalent to 8-10 °d);
  - (MF) highest indicated, normally 3.74 mmol $CaCO_3$/l (equivalent to 21 °d)

— Temperature:
  - Wash: 50C
  - Rinse: 65C

— Dosage:
  - Reference: 3 mL rinse aid (formula III) + 20 g IEC-D detergent
  - Test product (RA): 3 mL test product + 20 g IEC-D detergent
  - Test product (MF) One standard dose a recommended by the manufacturer.

— Wash cycles: A minimum of 3 wash cycles, after which assessment (readings) can be made.

— Ballast soil: 50 grams of ballast soil must be used in each wash cycle. The ballast soil must be based on starch, protein and fat. Additionally, other constituents from food ingredients may also be present.

— Materials: stainless steel, glass, plastic and porcelain must be used as a minimum.

– Industrial and Institutional DD (IIDD)

Section (IIDD Protocol)	Description/Outline of the change
All sections	Wording improvement (inclusive of moving text to footnotes) Explicit mention to scope (covers mono- and multi-functional products) Set minimum testing conditions, namely: → Testing elements and stages defined beforehand and identical for each repetition unless justified as comparable (but not identical). → Testing not to be carried out with plastic cleaning beads. → Testing according to manufacturer's recommendations, as claimed in the product (e.g. label; product sheet), specifically: • → at the normally soiled dishwashing load • → at the lowest washing temperature and; • → at the highest water hardness and; • → at the recommended dosage considering the former aspects
Section 1.2	Reference to generic formulation in standard EN 17735[xxvi], as feasible reference products (See Table A.2 and A.3 in standard; Table 1 & 2 in EUEL framework). Specifications of how dosages given in ranges should be considered for testing purposes (lowest for hard water at lowest temperature claimed as effective). Defining "product category" (products with comparable intended uses, function/s and/or industrial sector/s) and requesting reference product to be of the same product category as the test product, as horizontal alignment with IILD framework.
Section 1.3	Assessment of performance based on testing of performance effects (e.g. cleaning/soil removal; shine, drying time, streak-free performance). The performance test is passed when each performance effect tested is equal or better than that of the reference product used. A performance effect is equal to or better than the reference product if: → 5 repetitions -> the results are equal to or better in 100% of the scores. → 10 repetitions -> the results are equal to or better in 80% of the scores. → Statistical methods -> alternatively to the former, an statistical test with a one-side 95% confidence range shows the results are equal to or better
Section 1.4	Reporting requirements alignment with former aspects modified with the laboratory test, namely: → Testing made for normally soiled dishwashing load at the corresponding water hardness and the lowest recommended cleaning temperature (as per product specifications). → Evaluation based on the pooled effect of performance effects. In addition, it is required: → to describe the test procedure/methods by performance effects tested, and to justify why such are suitable/relevant for testing such performance effect. In addition, requirement to justify identical testing conditions or when these were not identical but comparable. → to inform about approval of product/s as reference products by a Competent Body → Information about product's (reference and tested) recommendations (dosage, lowest washing temperature, highest water hardness, date of purchase and testing).

REMARKS (*Laboratory test)*

- Alignment with IILD in horizontal aspects.

- Assessment proposed via performance effects. Stakeholder suggested organizing by product type:
  - *dishwasher detergent : cleaning/soil removal and shine ;*
  - *rinse aid : drying time and streak-free performance ;*
  - *multi-component system : all effects.*
  - *other products: each effect should be tested.*

Question 110 (Q110) – Would you support setting structuring claims by product they refer to (See IILD TR2 rationale) rather than by the type of claim (primary/secondary; See TR2 proposal text)?

European Commission

7. FfU criterion – Hard surface cleaning (HSC) products

Section (HSC Protocol)	Description/Outline of the change
All sections	Wording improvements — implying removal, addition or re-location of the text within the document. Sections re-structuration -> Sub-headings addition to sections 1.2 and 2.2 Restriction of User test — only for professional products Alignment of *User test* with *Laboratory test* with regards to reference products (specifically market reference products) requirements (i.e. requiring
	CB approval of the reference product). Clarification — products both for consumer/professional use must be tested against a professional use type reference product.
Section 1	Addition of control test (only water, no cleaning product) to accurately allocate *cleaning effect* to the use of test/reference products and not to other testing conditions (related to method quality).
Section 1.2.2, Table 22	Replacement of current all-purpose cleaner generic formulations by that on Appendix C of DE-UZ 194, v1.2[488] Addition of a new generic formulation based on IKW recommendation for window cleaners[489]
Section 1.2.3, Table 23	Soiling reference changed for window cleaners — existing soiling has been replaced by that based on IKW recommendation for window cleaners
Section 1.2.4, Table 24	Procedure for testing added for window cleaners - IKW recommendation for window cleaners
Section 1.3, Table 25	Addition of IKW recommendation for window cleaners as assessment method for window cleaners.
Section 2.2	Re-structuration of this section with sub-headings.
Section 2.2.1	Products containing microorganisms (*microbial cleaning products*) — the reference product shall be without microorganisms.
Section 2.3	For products containing microorganisms (*microbial cleaning products*) and with a claim on *"long-lasting"* cleaning effect — Requirement to include specific questions in the test survey to rate and describe/qualify such effect.

REMARKS (for which inputs are welcomed!)

- **Generic formulations** – closer but not yet at market reality.
- **MCP** – specific claims/modes of cleaning (i.e. *long-lasting*) still undefined (yet testing obligation in place)
- *Should/can we **restrict** testing only **to Laboratory**?*

Question 118 (Q118) – Would you consider appropriate to eliminate the possibility of the *User test* from HSC performance framework, thus restricting compliance with the *Fitness for use* criterion solely to laboratory tests?

European Commission

7. FfU criterion – Hand-dishwashing detergents (HDD)

Section (HDD Protocol)	Description/Outline of the change
All sections	Wording improvements – implying removal, addition or re-location of the text within the document. Explicit reference and alignment with the new/updated IKW recommendation for HDD product performance testing[48].
Section 2	New section 2.1 – Controls, adding water and internal detergent. – Water (no detergent) to accurately allocate *cleaning effect* to the use of test/reference products and not to other testing conditions (related to method quality). – Internal detergent (detergent used in every test by the laboratory) to accurately delimit the reproducibility/quality of the testing method. Set minimum testing elements and stages defined beforehand and identical for each repetition unless justified as comparable (but not identical).
Section 2.3	Explicit request to measure washing water parameters (temperature, hardness).
Section 2.4	Proposal for inclusion as reference detergent of: – market products, given absence (so far) of accepted generic formulation (based on feedback) and in alignment with other EUEL criteria product groups. – generic formulations, in alignment with EUEL HSC and under similar rationale.
Section 2.5	Inclusion of soil specifications for the claim *"high degreasing efficiency"* (high fat content; ≥60%; w/w). Addition of the possibility to use alternative soiling formulation and conditions if approved by the Competent Body, with comparability based on the profile of carbohydrates/proteins/fats expressed in dry matter basis (%; w/w)
Section 3	Reporting requirements split into: – Section 3.1 – general requirements, applicable to all tested products as per existing HDD framework – Section 3.2 – specific requirements, additional requirement related to specific claims, either explicitly included in EUEL framework (i.e. *High degreasing efficiency*) or not.

REMARKS (for which inputs are welcomed!)

- **Adapted** to most **recent IKW** test (12/2024) .

- **Reference product –** generic formulations proposed found not suitable, thus could alignment with HSC (generic or market).

Question 112 (Q112) – Do you support the inclusion of market products and generic formulations as suitable reference detergent products? In addition, do you consider that the formulation for the internal detergent control in the IKW test could be used as generic formulation for EUEL HDD performance testing purposes?

- **Degreasing capacity –** requires using a high fat soil (as IKW or alternative if CB approves). Also, align with NS (025 criteria) and/or propose alternative methods (e.g. gravimetric)?

Question 113 (Q113) – Would you support alignment with NS (025 criteria, v6.12) with regards to performance testing of the degreasing efficiency (ability to remove fat; See HDD rationale)?

7. FfU criterion – Questions recap (I)

All product groups

Question 94 (Q94) – Do you support restricting primary claims to external laboratory/testing facilities claims using the wording below for all product groups? [...]

Existing wording: *The manufacturer's test laboratory or/and an external test laboratory can be approved to conduct testing to document effectiveness of [Product group] …* [...]

Proposed wording: *With regards to testing to document effectiveness of detergent/cleaning products for compliance with EU Ecolabel criteria:*

Primary claims (those related to intended functions that can be classed under the "washing/cleaning" scope and that are purposely targeted, thus mainly driving product characteristic.) can only be performed in external laboratories/testing facilities.

Secondary claims (those related to any function/s not being considered under the scope of "washing/cleaning", thus not being considered primary claims) can be approved to be performed in internal (e.g. manufacturer's) or external test laboratories.

The test should be approved beforehand by the corresponding Competent Body. [...]

Question 95 (Q95) – Would you support opening the methods for deviations in terms of devices used conditioning to justifying leading to comparable results? For example, using in LD using an washing machine leading to equivalent function/results as intended in the method. If so, would you support the following wording?

Existing wording: *the test laboratories must be equipped with the devices described in the test method…*

Proposed additional wording (just after sentence): *…or equivalent if justification is provided to and accepted by the corresponding Competent Body that their use leads to comparable function/results,*

European Commission

[...] – question text shortened

7. FfU criterion – Questions recap (II)

All product groups

Question 96 (Q96) – Do you support the proposal made for a criteria/definition on "*market reference product*" (Please see rationale for full details, inclusive the proposal

Question 97 (Q97) – Related to Q96 and referred to the following wording on a potential definition for "*market reference product*" ("*be well-known and part of the leaders with a sufficient sales volume;*"), would you support choosing amongst the top 5 products according to sales volumes using a database? If so, which database would you suggest (e.g. NIQ)? In addition, which do you consider should the scope (e.g. European level/EU Member State/other? (Please see rationale for full discussion details.)

Question 98 (Q98) – Related to Q96 and referred to the following wording on a potential definition for "*market reference product*" ("*not hold an ecolabel certification (e.g. EU Ecolabel, Nordic Swan, Blue Angel);* would you support having exclusions to it? (Please see rationale for full discussion details.) *Please, provide a reasoned response.*

Question 99 (Q99) – Would you support raising the number of replicates required for the *User test* of the EUEL performance frameworks where this option is available (IILD, IIDD, HSC) as a way to enhance the accuracy/validity of the results? In particular, would you support raising the current minimum number (n=5) to ten (n=10)?

Question 100 (Q100) – Please, share any other reasoned feedback you may have on general (applicable to one or more EUEL product groups) aspects on *Fitness for use* by replying to this question.

7. FfU criterion – Questions recap (III)

LD

Question 101 (Q101) – Do you support setting the minimum temperature at which a LD can be claimed efficient to be equal as the water temperature of the washing machine inlet? Alternatively, would you support setting a fixed minimum temperature for LD efficiency at 20C, thus removing the entry for 15C?

Question 102 (Q102) – Do you support removing ironing from LD protocol given that it could a source of test variability due to changes in stain colour associated with the heat applied to the test fabric? If not, do you support mandatorily request ironing so all test are performed under the same conditions?

Question 103 (Q103) – Would you support allowing market products as reference detergent for LD performance testing as way to keep up with market developments (e.g. novel products; new claims)? If so, would you support removing from LD protocol those generic formulations considered as outdated (no longer reflecting market reality)?

Question 104 (Q104) – Please, share any other reasoned feedback you may have on *Fitness for use* related aspects about EUEL LD by replying to this question.

IILD

Question 105 (Q105) – Could you share the number of EUEL ecolabelled products/licenses that passed the performance testing using the *Laboratory test* option?

Question 106 (Q106) – Would you support setting the testing water hardness at "low" (0.5-1 mmol $CaCO_3$/L) level only, then also performing a reduced confirmatory test (model fabric; ash and greying) that the builder system is effective at "hard" (the highest) water hardness?

Question 107 (Q107) – Would you support setting structuring claims by product they refer to (See IILD TR2 rationale) rather than by the type of claim (primary/secondary; See TR2 proposal text)?

Question 108 (Q108) – Please, share any other reasoned feedback you may have on *Fitness for use* related aspects about EUEL IILD by replying to this question.

7. FfU criterion – Questions recap (IV)

DD

Question 109 (Q109) – Please, share any other reasoned feedback you may have on *Fitness for use* related aspects about EUEL DD by replying to this question.

IIDD

Question 110 (Q110) – Would you support setting structuring claims by product they refer to (See IILD TR2 rationale) rather than by the type of claim (primary/secondary; See TR2 proposal text)?

Question 111 (Q111) – Please, share any other reasoned feedback you may have on *Fitness for use* related aspects about EUEL IIDD by replying to this question.

HDD

Question 112 (Q112) – Do you support the inclusion of market products and generic formulations as suitable reference detergent products? In addition, do you consider that the formulation for the internal detergent control in the IKW test could be used as generic formulation for EUEL HDD performance testing purposes?

Question 113 (Q113) – Would you support alignment with NS (025 criteria, v6.12) with regards to performance testing of the degreasing efficiency (ability to remove fat; See HDD rationale)?

Question 114 (Q114) – Do you support the inclusion of a control test (only water, no detergent), as reflected in current TR2 proposal (See HDD rationale for details)?

Question 115 (Q115) – Please, share any other reasoned feedback you may have on *Fitness for use* related aspects about EUEL HDD by replying to this question.

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7. FfU criterion – Questions recap (V)

HSC

Question 116 (Q116) – Do you support the inclusion of a control test (only water, no detergent), as reflected in current TR2 proposal (See HDD rationale for details)? *Please provide a reasoned response.*

Question 117 (Q117) – Would you consider as acceptable verification mean to prove HSC performance test reproducibility data on internal testing controls (reference cleaner used in all test runs to account for inter-/intra- test variability)?

Question 118 (Q118) – Would you consider appropriate to eliminate the possibility of the *User test* from HSC performance framework, thus restricting compliance with the *Fitness for use* criterion solely to laboratory tests? *Please, provide a reasoned response.*

Question 119 (Q119) – Please, share any other reasoned feedback you may have on *Fitness for use* related aspects about EUEL HDD by replying to this question.

Questions / Comments?

European Commission

8. Packaging

[**Part 1 of 2**:
Recycled content; Design for Recycling]

European Commission

8. Criterion Packaging
Recycled material content

Objectives: reduce the environmental impact of packaging and packaging waste by promoting the use of recyclable and reusable materials and encouraging the recycling and recovery of packaging waste to prevent final disposal

New (EU)2025/40 Packaging and Packaging Waste Regulation (PPWR), promotes the use of recyclable and reusable materials and **includes mandatory targets for recycled content** of packaging.

By 1 January 2030:

- 30 % for contact-sensitive packaging, made from polyethylene terephthalate (PET) as the major component; except single use beverage bottles,
- 10 % for contact-sensitive packaging made from plastics other than PET, excluding single-use plastic beverage bottles
- 30 % for single-use plastic beverage bottles
- 35 % for plastic packaging other than those mentioned above

By 1 January 2040:

50 % for contact-sensitive packaging, made from polyethylene terephthalate (PET) as the major component; except single use beverage bottles,

25 % for contact-sensitive packaging made from plastics other than PET, excluding single-use plastic beverage bottles

65 % for single-use plastic beverage bottles

65 % for plastic packaging other than those mentioned before

These targets vary by packaging type (polymer used) and are calculated as an **average per manufacturing plant and year.**

European Commission

8. Criterion Packaging
Recycled material content

The **new sub-criterion introduces percentages of recycled content** in detergent products packaging to reduce the environmental impact of packaging , support the EU's circular economy objectives and ensure a response to developments in the political framework.

Main streams of evidences:

- Political framework
- Other ecolabels
- Stakeholders information

Blue Angel:

- 80% PCR for paper/cardboard in primary packaging
- 70% PCR for paper/cardboard in secondary packaging.
- 70% PCR for PET
- 50% PCR others plastics

Nordic Swan:

- 90% PCR for paper/cardboard, 70% or 50% for corrugated board
- 50% PCR for plastics

European Commission

8.Criterion Packaging
Recycled material content

Technical report 1 (TR1)
1st AHWG

Pack background discussion
Sub-AHWG

<u>Changes overview:</u>

- Criterion wording
- Criterion Scope
- Criterion Requirements
  a) Ambition levels paper/cardboard
  b) Ambition levels plastics

8.Criterion Packaging Recycled Material Content - Criterion wording and scope

TR2 – Proposed 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 (for consumer and professional detergent products)

— Sales packaging ~~(primary packaging)~~ made of paper and/or cardboard shall contain a minimum ~~80~~ 85 % of recycled material.
— Grouped packaging ~~(secondary packaging)~~ made of paper and/or cardboard shall contain a minimum ~~70~~ 80 % of recycled material.

Exemptions from requirement: Cardboard packaging, used as sales 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 sourcing certifications ~~Forestry Management~~ issued by an independent third-party certification scheme (e.g. 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 (for consumer products and professional detergent products)

(i) Sales packaging

— Until 31 December 2029, sales packaging made of PET shall contain a minimum of 60% recycled material, other plastics (e.g. PP, HDPE) shall contain a minimum of 35% recycled material.
— From 1 January 2030, sales packaging made of PET shall contain a minimum of 70% recycled material, other plastics (e.g. PP, HDPE) shall contain a minimum of 50% recycled material.

ALL

~~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. PP, HDPE) shall contain a minimum of 50% recycled material (PCR).~~

Definitions added (*Recycled content/Recycled Material*; removal from legal text (*Post-consumer material – PCR)*

Inclusion of definition of **'Recycled Material'** and **'Recycled Content,'** which considers only **post-consumer materials**, according to **ISO 14021:2016**

"The recycled content is the proportion, by mass, of recycled material in a packaging. "Recycled material" refers to material that has been reprocessed from recovered material by means of manufacturing process and made into a final product or into a component for incorporation into a product.

Only post-consumer materials shall be considered as recycled content, consistent with the following definition:

"Post-consumer material" means material generated by households or by commercial, industrial and institutional facilities in their role as end-users of the product, which can no longer be used for its intended purpose. This includes returns of material from the distribution chain."

Exclusion of the wording 'PCR - recycled plastic made from post-consumer recycled'

8.Criterion Packaging Recycled material content

Requirements for paper/cardboard

TR2 - Proposed 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 (for consumer and professional detergent products)

— Sales packaging ~~(primary packaging)~~ made of paper and/or cardboard shall contain a minimum ~~80~~ 85 % of recycled material.
— Grouped packaging ~~(secondary packaging)~~ made of paper and/or cardboard shall contain a minimum ~~70~~ 80 % of recycled material.

Exemptions from requirement: Cardboard packaging, used as sales 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 sourcing certifications ~~Forestry Management~~ issued by an independent third-party certification scheme (e.g FSC, PEFC or equivalent). The certification bodies issuing Sustainable ~~Forestry Management~~ certificates shall be accredited/recognised by that certification scheme.

Changes overview:

Sales packaging 85% of recycled content

Grouped packaging 80% of recycled content

Exemption of cardboard packaging for liquid products maintained: higher recycled content might compromise packaging integrity due to humidity sensitivity

Kraft paper: further feedback needed

Type of Material Packaging	Data Points	Average Recycled Content (%)	Median* Recycled Content (%)
Paper/ Cardboard	35	80.9	98.0

European Commission

8. Criterion Packaging Recycled material content

Requirements for plastics

	b) Plastic used for packaging (for consumer products and professional detergent products) (i) Sales packaging — Until 31 December 2029, sales packaging made of PET shall contain a minimum of 60% recycled material, other plastics (e.g. PP, HDPE) shall contain a minimum of 35% recycled material. — From 1 January 2030, sales packaging made of PET shall contain a minimum of 70% recycled material, other plastics (e.g. PP, HDPE) shall contain a minimum of 50% recycled material.
ALL	~~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. PP, HDPE) shall contain a minimum of 50% recycled material (PCR).~~

Stakeholders concerns after the 1st proposal and sub-AHWG:

- Availability of recycled plastics and challenges within the supply chain
- Quality and safety issues, especially for PE and PP plastics, which can absorb contaminants
- Increased vulnerability to stress crack effects

Type of Material Packaging	Data Points	Average Recycled Content (%)	Median* Recycled Content (%)
PET	35	65.6	61.9
PP	13	51.2	59.4
HDPE	16	34.7	34.6

8. Criterion Packaging Recycled material content

~~All closures and trigger closures (e.g. removable closures and pump dosers) and pounches are exempt from this requirement.~~

Exemptions from the requirement:

- Pouches
- Any plastic part representing less than 5% of the total weight of the whole packaging unit
- Packaging used for the transport of dangerous goods in accordance with Directive 2008/68/EC
- Products delivered in a plastic package that is part of a take-back system

(ii) Grouped packaging

— Single-use plastic packaging shall not be used in grouped packaging.

— Other types of plastics used in grouped packaging shall have a minimum recyclability performance grade of 95%.

Requirements for plastics

Exemption from the requirement:

- Pouches
- Any plastic part representing less than 5% of the total weight of the whole packaging unit
- Packaging used for the transport of dangerous goods in accordance with Directive 2008/68/EC
- Products delivered in a plastic package that is part of a take-back system

New Plastic grouped packaging requirements
In line with PPWR

Additional requirement for both Paper/Cardboard and Plastics

c) Additional requirements

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 of the whole packaging unit. ~~(body, closure, label/sleeve and trigger closure).~~

European Commission

8. Criterion Packaging
Recycled material content

Assessment and verification:

The applicant shall submit: (1) a signed declaration of compliance specifying the percentages of recycled content in the sales (primary) and grouped (secondary) packaging when relevant; (2) A declaration of compliance specifying that single-use plastic packaging is not utilized in grouped packaging and a declaration of compliance specifying the recyclability performance grade of grouped plastic packaging; (3) a high resolution photograph of the sales packaging where information regarding recycled content and recyclability appears clearly.

Competent bodies shall check the declaration of compliance specifying the percentages of plastic recycled content for sales packaging again after 1 January 2030.

The applicant shall provide audited accounting documents that demonstrate that the remaining share (100% minus recycled content percentage) of the paper and/or cardboard used for the sales and grouped packaging is defined as certified material according to valid scheme such as FSC, PEFC or equivalent schemes. The audited accounting documents shall be valid for the whole duration of the EU Ecolabel license.

Recycled content shall be verified by complying with the EN 45557 or ISO 14021. Plastic recycled content in the packaging shall comply with chain of custody standards such as ISO 22095 or EN 15343. Equivalent methods may be accepted if considered equivalent by a third-party, and shall be accompanied by detailed explanations showing compliance with this requirement and related supporting documentation. Invoices demonstrating the purchase of the recycled material shall be provided.

Recyclability of plastic grouped packaging shall be verified by complying with the CEN 'Design for Recycling of Plastic Packaging' standards or equivalent testing methods, such as RecyClass. Equivalent testing methods may be accepted if deemed comparable by an independent third-party certification for plastic packaging. Once the CEN 'Design for Recycling of Plastic Packaging' standards are implemented, they will supersede all other equivalent testing methods.

Assessment and Verification

The **recycled content** must be verified by adhering to **EN 45557** (General method for assessing the proportion of recycled material content in energy-related products), **ISO 14021** (Environmental labels and declarations — Self-declared environmental claims), or **equivalent methods.**

Plastic recycled content in packaging **shall comply with chain of custody** standards such as **ISO 22095** — Chain of custody—General terminology and models or EN 15343.

Recyclability of plastic grouped packaging shall be verified by complying with **CEN 'Design for Recycling of Plastic Packaging'** or equivalent testing methods, (e.g. RecyClass). Implemented CEN standard will supersede the equivalent method

8.Criterion Packaging
Recycled material content

- Question 70 (**Q70**) – Do you support the new requirement for sales packaging to have at least 85% recycled paper or cardboard, and for grouped packaging to have at least 80%?
- Question 71 (**Q71**) – What types of paper are commonly used for packaging liquid products? Is kraft paper the predominant choice?
- Question 72 (**Q72**) – What are the typical applications of kraft paper, and how might these influence the setting of recycled content requirements in various packaging contexts?
- Question 73 (**Q73**) – What percentage of recycled material can be effectively incorporated into flexible paper packaging without compromising quality?
- Question 74 (**Q74**) – Do you support applying the proposed recycled content requirements for paper and cardboard to professional products (HSC, IILD, and IIDD)? If not, what specific challenges do you foresee for professional product packaging? Can you suggest changes that would address these issues while maintaining a minimum level of recycled content?
- Question 75 (**Q75**) – Do you agree with the newly proposed requirements for plastic packaging and the step-wise approach? If not, what challenges or suggestions do you have regarding this proposal?
- Question 76 (**Q76**) – Are there any comments on the *Assessment and Verification* requested for compliance with this criterion?
- Question 77 (**Q77**) – Please, share any other comments/suggestions you deem relevant about this criterion providing reasons supporting them.

8.Criterion Packaging
Design for Recycling - Highlights

Significant changes have been made to the **content** and **structure** of the **Design for Recycling criterion**

Updated 'Design for Recycling' table with **stricter, more ambitious provisions**.

Parameters included in the criterion in force

- Label or sleeve
- Closure
- Barrier coatings

NEW proposal

- Main Body/ Material composition
- Colours
- Label or sleeve
- Adhesives
- Closure
- Barrier coatings
- Additives
- Inks/Printing

In line with PPWR

Requirements categorized by:

Packaging type

- Fibre-based
- Pouches/plastic bags
- Etc.

Plastic type

- PET
- HDPE
- PP
- PE and PP flexible films

Evidence streams:

- Stakeholders feedback
- Consultation recycler experts
- Consultation recycling guideline
- Consultation ISO Type 1 scheme

Recycling guideline

- RecyClass Design for Recycling
- Minimum German standard
- CEFLEX (D4ACE)

ISO Type 1 scheme

- Nordic Swan
- Blue Angel

European Commission

8.Criterion Packaging Design for Recycling

Main Body/ Material composition

Packaging element	Excluded materials, components and **treatment** (*1)
Main Body/ Material composition	For fibre-based packaging — Lacquered surface *(Exception: clear protective lacquer up to a thickness of ≤ 5 µm)* — Plastic-coated surface For pouches/plastic bags and other laminates — Multilayer structure composed of different polymers/materials *(Exceptions: PP up to 5 wt% in PE flexibles and PE up to 10 wt% in PP flexibles)* For all plastic packaging — Fluorination treatment — Electrobeam treatment

European Commission

8.Criterion Packaging Design for Recycling

Colours

Packaging element	Excluded materials, components and treatment (*1)
Colours	For all plastic packaging — Non-NIR detectable colours — Black, carbon black, inner black layer, fluorescent, For PET packaging — opaque

‘Opaque’ definition

‘Opaque’ means a property of a PET plastic container that prevents the passage of light to such an extent that text placed directly against the container cannot be read. In this context, a container is classified as opaque if, when its walls are pressed together and placed against a white sheet with 5 mm black capital letters, the text is not visible using reflected light. This classification adheres to the UNI 1103801-2010 standard, distinguishing opaque containers from those that allow text readability, which are considered non-opaque.

8.Criterion Packaging Design for Recycling

Label and sleeve

Packaging element	Excluded materials, components and treatment (*1)
Label or sleeve	For all plastic packaging — Metallised labels or sleeves — Non-releasable or welded to a packaging body (in mould labelling) — Paper labels with fibre loss — Label/sleeve on container > 500 ml covering more than 70% of the container. Label/sleeve on container ≤ 500 ml covering more than 50% of the container[424]. For PET packaging — PS, PVC, PETG, C-PET, POM, PET *(Exception: LDPET (< 1 g/cm3))* labels/sleeves or any other plastic materials for sleeves/labels with a density > 1 g/cm³ For HDPE/PE and PP packaging — PS, PVC, PET, PETG, C-PET, PLA, PE-X (crosslinked PE), or any other plastic materials for sleeves/labels with a density < 1 g/cm³ *(Exceptions: for PO, PE, PP labels/sleeves)* For PE and PP flexible films packaging — Labels of a different material to the main material *(Exceptions: PP up to 5 wt% in PE flexibles and PE up to 10 wt% in PP flexibles)* — PE-X (cross-linked PE), — Fibre-based (paper) labels

— Question 83 (**Q83**) – Question for label and adhesive producers/suppliers regarding adhesive requirements: In light of recent technological advancements, do you believe the new requirements can be met with your current capabilities and plans by 2026/2027?

European Commission

8.Criterion Packaging Design for Recycling

Adhesives

Packaging element	Excluded materials, components and **treatment** (*1)
Adhesives	For PET packaging — Alkali/water non-soluble adhesive — Alkali/water non-releasable adhesive at 60-80°C For HDPE/PEpackaging — Non-releasable in the recycling process for HDPE packaging For PP packaging — Non-releasable in the recycling process for PP packaging For PE and PP flexible films packaging — Non-soluble in water or non-releasable in water at less than 40°C

8.Criterion Packaging Design for Recycling

Closure

Closure	For all plastic packaging — Closures made of metal, glass~~, EVA which are not easily separable from the packaging~~ — Closures made of silicone. ~~Silicone closures with a density < 1 g/cm³ in combination with a PET bottle packaging and silicone closures with a density > 1 g/cm³ in combination with PEHD HDPE or PP bottle packaging are exempted.~~ — Metallic foils or any seals which remain fixed to the bottle or its closure after the product has been opened For PET packaging — PS, PVC, C-PET, POM, PETG closures with a density > 1 g/cm³ and any other materials and blends with density >1 g/cm³ — EVA- containing component (e.g. liner or valve) with density ≥1 g/cm³ For HDPE/PE packaging — PS, PVC closures, — PET, PETG, PLA (all with density > 1 g/cm³) — PP >10%, PE-X (cross-linked PE), — Non-PO-plastics with a density of < 1 g/cm³ — Foams with density < 1 g/cm³ For PP packaging — PS, PVC closures, — PET, PETG, PLA (all with density > 1 g/cm³) — HDPE, LDPE, LLDPE, MDPE, PE-X (cross-linked PE), — Non-PO-plastics with a density of < 1 g/cm³ — Foams with density < 1 g/cm³ For PE and PP flexible films packaging — Closure of a different material to the main material — Aluminium, PVC, PET, PETG, PS, PLA, nonPO — Foams with density < 1g/cm³

8.Criterion Packaging Design for Recycling

Barrier coatings

Packaging element	Excluded materials, components and treatment (*1)
Barrier coatings	For all plastic packaging — Polyamide (PA) — Functional polyolefins — Metallised and light blocking barriers For PET packaging — EVOH — PGA For HDPE and PP packaging — EVOH ≥ 6 wt% provided with tie layers ratio ≥ 2 made by a polymer different that the one used for the packaging body — PVDC — PVOH For PE and PP flexible films packaging — EVOH ≥ 5 wt% provided with tie layers made by a polymer different that the one used for the packaging body — PVC, PVDC, PE-X (cross-linked PE), — PVOH, AlOx coating with PVOH primer — Aluminium

European Commission

8.Criterion Packaging Design for Recycling

Additives

Packaging element	Excluded materials, components and treatment (*1)
Additives	For all polyolefin plastic packaging — Additives that do increase the density higher than 0,97 g/cm³ (e.g.$CaCO_3$, etc.) — Bio-/oxo-/photodegradable additives; For PET packaging — Nanocomposites — Bio-/oxo-/photodegradable additives — UV stabilizers; Acetaldehyde (AA) blockers; Optical brighteners; Oxygen scavengers For HDPE and PP packaging — Flame-retardant additives, plasticizers For PE and PP flexible films packaging — Foaming agents used as expanding chemical agents

8.Criterion Packaging Design for Recycling

Inks/printing

Packaging element	Excluded materials, components and **treatment** (*1)
Inks/Printing	For all packaging — Direct print (*Exceptions: production codes, date codes and UFI codes*[425]) — Inks non-compliant with EuPIA Exclusion Policy for Printing Inks and Related Products[426] — Bleeding inks — De-inking/washable inks — NC and PVC binders For PET packaging — Metallic inks For HDPE and PP packaging — PVC copolymers and terpolymer binders and any other chlorinated binders For PE and PP flexible films packaging — Direct print *(Exceptions: a) production codes, date codes and UFI codes*[427]*; b) inks (without NC and PVC binders) up to a maximum 5% of total packaging structure weight)*

8.Criterion Packaging
Design for recycling. List of questions

- Question 78 (**Q78**) – Do you agree with the modifications proposed for the 'Design for Recycling' criterion? If not, what are the reasons for disagreement?
- Question 79 (**Q79**) – What are the current capabilities of standard recycling processes in effectively separating and recycling all components of liquid packaging board, including paper and plastics, and to what extent is there a need for specialized mills and processes to enhance its recyclability?

- Question 80 (**Q80**) – How widespread is the adoption of advanced recycling technologies across Europe that can handle the complexities of liquid packaging board recycling?
- Question 81 (**Q81**) – Are there specific wet-strength agents, adhesives, inks, labels or other components/materials that should be used or avoided to enhance the recyclability of liquid packaging board?
- Question 82 (**Q82**) – What specific characteristics, including the thickness and content of the PE coating, should liquid packaging board components have to ensure high-quality recycling and effective fiber recovery?
- Question 83 (**Q83**) – Question for label and adhesive producers/suppliers regarding adhesive requirements: In light of recent technological advancements, do you believe the new requirements can be met with your current capabilities and plans by 2026/2027?
- Question 84 (**Q84**) – Please, share any other comments/suggestions you deem relevant about this criterion providing reasons supporting them.
- Question DR (**QDR**) Considering the evolving technologies in recycling, should the exemption for pump mechanisms (including sprays) from the 'Design for Recycling' criterion requirements be maintained, or is it feasible for these components to now meet the recycling design requirements?

Questions / Comments?

European Commission

Revision of the EU Ecolabel criteria for
DETERGENT AND CLEANING PRODUCTS

BREAK (15')

ETIQUETTE FOR VIRTUAL MEETING PARTICIPANTS

- **Please indicate "NAME OF YOUR ORGANIZATION + YOUR FULL NAME"**
- **MUTE YOUR MIC AND SWITCH OFF you CAMERA (unless you have the floor)**
- **USE THE CHAT only to ask for the FLOOR (write "FLOOR" in the chat), and COMMENT only ORALLY**

Agenda

Day 2: Thursday 13th March 2025 (Afternoon)

No	Item	SCHEDULE
7.	Criterion “Fitness for use”	14:30 – 15:40
8.	Criterion “Packaging”	15:40 – 16:15
Coffee Break (15 min)		*16:15 – 16:30*
9.	Criterion “Packaging”	16:30 – 17:05
10.	Criteria “Automatic dosing systems” + "User information" + "Information on EU Ecolabel"	17:05 – 17:25
11.	Conclusions, next steps and closure of the meeting	17:25 – 17:30

European Commission

9. Packaging

[**Part 2 of 2**:
WUR; Packaging take-back systems;
Product sold in spray bottle]

European Commission

9. Criterion Packaging Weight/utility ratio (WUR)

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The weight-utility ratio serves the purpose of reducing packaging volume and promoting the use of recycled materials, thereby aiding in the reduction of unnecessary transportation and air emissions, leading to lower CO_2 emissions. The WUR measures the amount of packaging used to deliver a specific product benefit.

ALL	$$\mathbf{WUR} = \sum \frac{(W_i + U_i)}{(D_i + R_i)}$$ Where: W_i: weight (g) of the sales packaging (primary packaging) (i); U_i: weight (g) of non-post-consumer recycled packaging in the sales packaging (primary packaging) (i). $U_i = W_i$ unless the applicant can prove otherwise; D_i: number of reference doses contained in the sales packaging (primary packaging) (i); R_i: refill index. R_i = 1 (packaging is not reused for the same purpose) or R_i = 2 (if the applicant can document that the packaging component can be reused for the same purpose and they sell refills).

European Commission

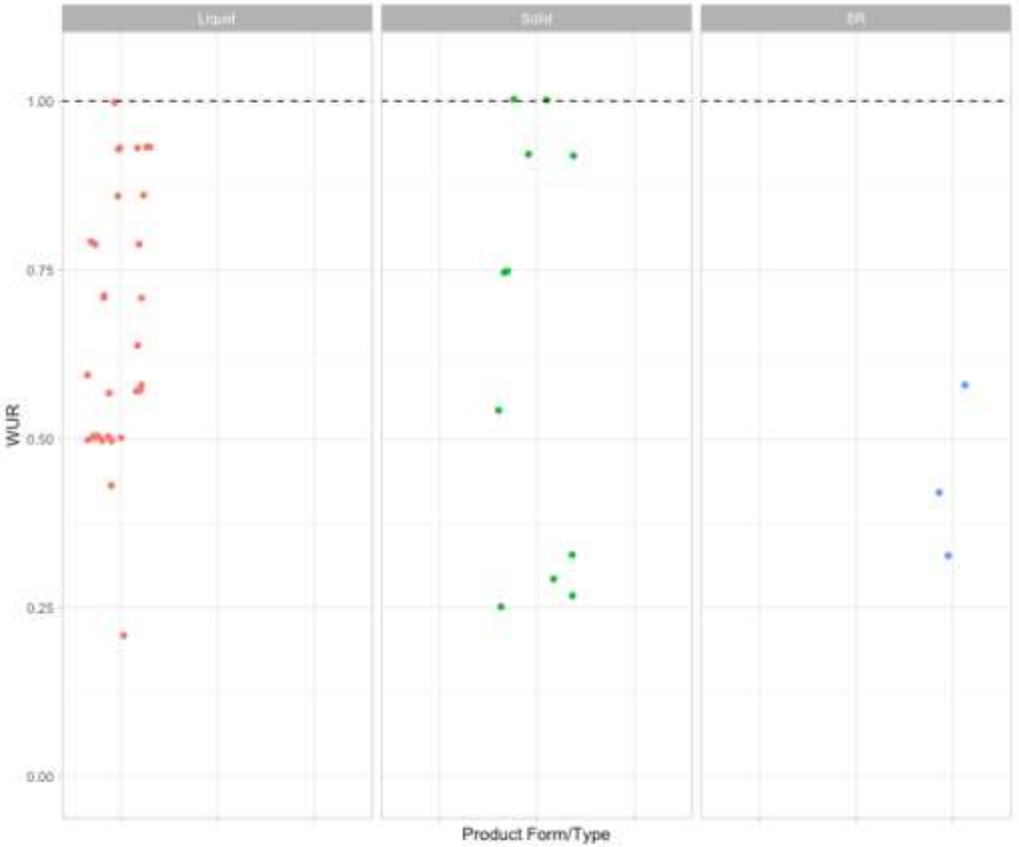
9. Packaging – WUR (LD)

WUR (g/kg laundry)

Product type	Acronym	Existing	TR1	TR2	Number (n)	Data Analysis	Other ecolabels	Stakeholders
Laundry detergent (solid)	Solid	*1.20*	*1.00*	*1.10*	11	1.10	1.20 (BA) 1.0 - 0.5 (NS)*	
Laundry detergent (liquid)	Liquid	*1.40*	*1.10*	*1.10*	30	1.18	1.20 (BA) 1.1 - 1.0 (NS)**	
Stain removers	SR	*1.20*	*1.20*	*0.70*	3	0.70	1.20 (BA) 0.70 (NS)	

* Solid cardboard packaging – powder in paper bag packaging
** Liquid in plastic packaging – liquid in cardboard packaging

Additional data needed for Stain Removers



European Commission

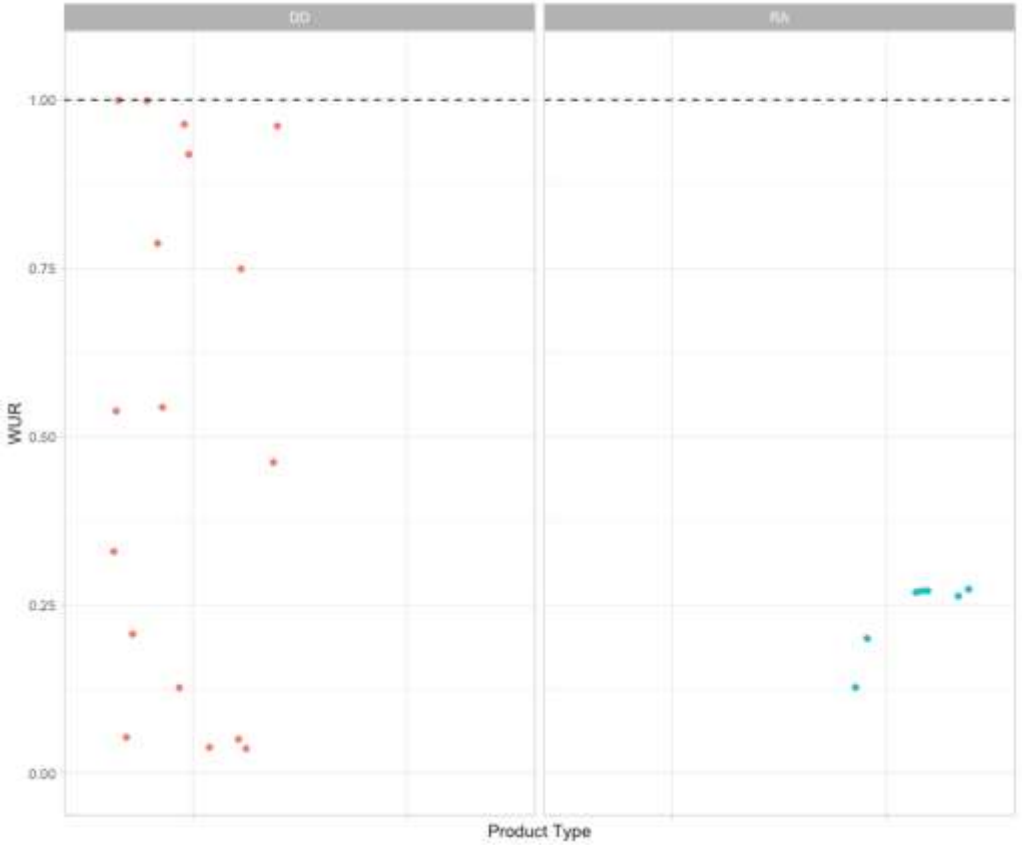
9. Packaging – WUR (DD)

WUR (g/wash)

Product type	Acronym	Existing	TR1	TR2	Number (n)	Data Analysis	Other ecolabels	Stakeholders
Dishwasher detergents	DD	2.40	*2.00*	*2.20*	17	2.21	2.0 (BA) 1.0 – 2.1 (NS)*	2.3
Rinse aids	RA	1.50	*0.40*	*0.40*	7	0.41	0.4 (BA) 0.35 (NS)	

* Min – Max threshold showing range for various product packaging formats (e.g. plastic pouches – solid cardboard).

Additional data needed for Rinse Aid



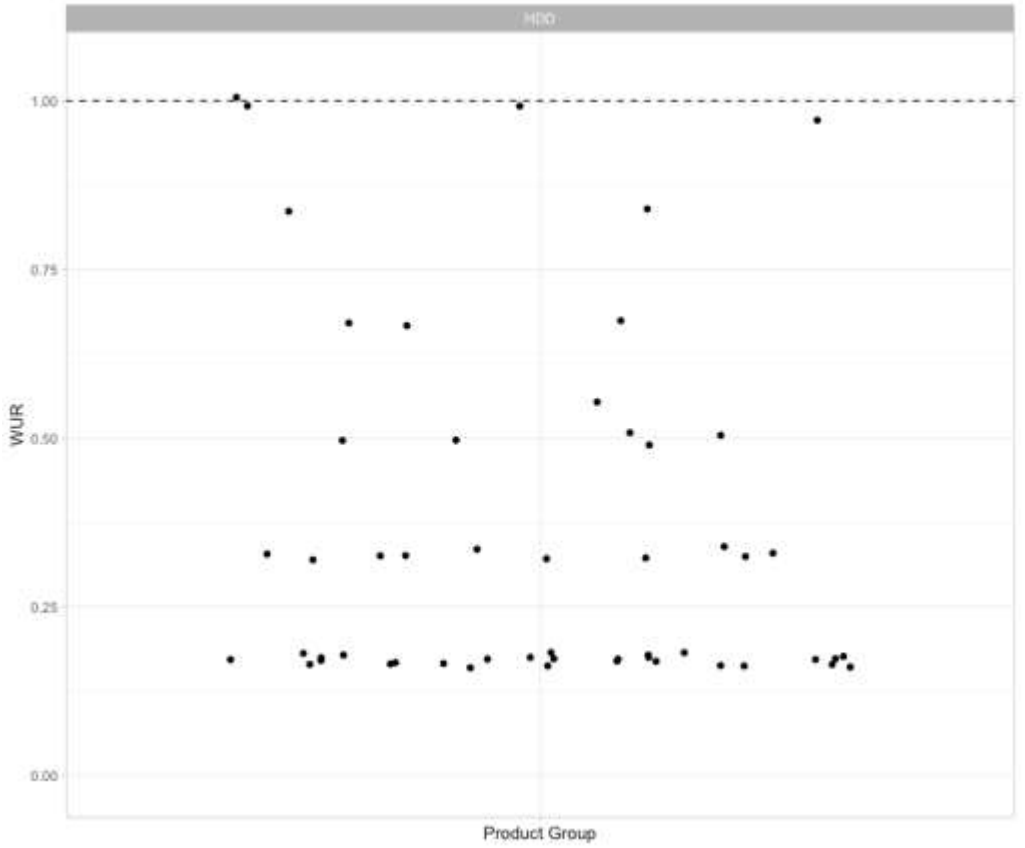
Question 86 (**Q86**) – Would it be possible to increase the ambition level for Dishwasher Detergent by reducing the threshold from 2.2 g/wash to 2.0 g/wash, aligning with the Blue Angel (BA) standards and the initial EU Ecolabel proposal? Please share your thoughts and any concerns you may have regarding this adjustment.

European Commission

9. Packaging – WUR (HDD)

WUR (g/l washing water)

Product type	Acronym	Existing	TR1	TR2	Number (n)	Data Analysis	Other ecolabels	Stakeholders
Hand-dishwashing detergent	HDD	0.60	0.30	0.30	*53*	0.30	0.3 (BA) 0.1 (NS - liquid)	



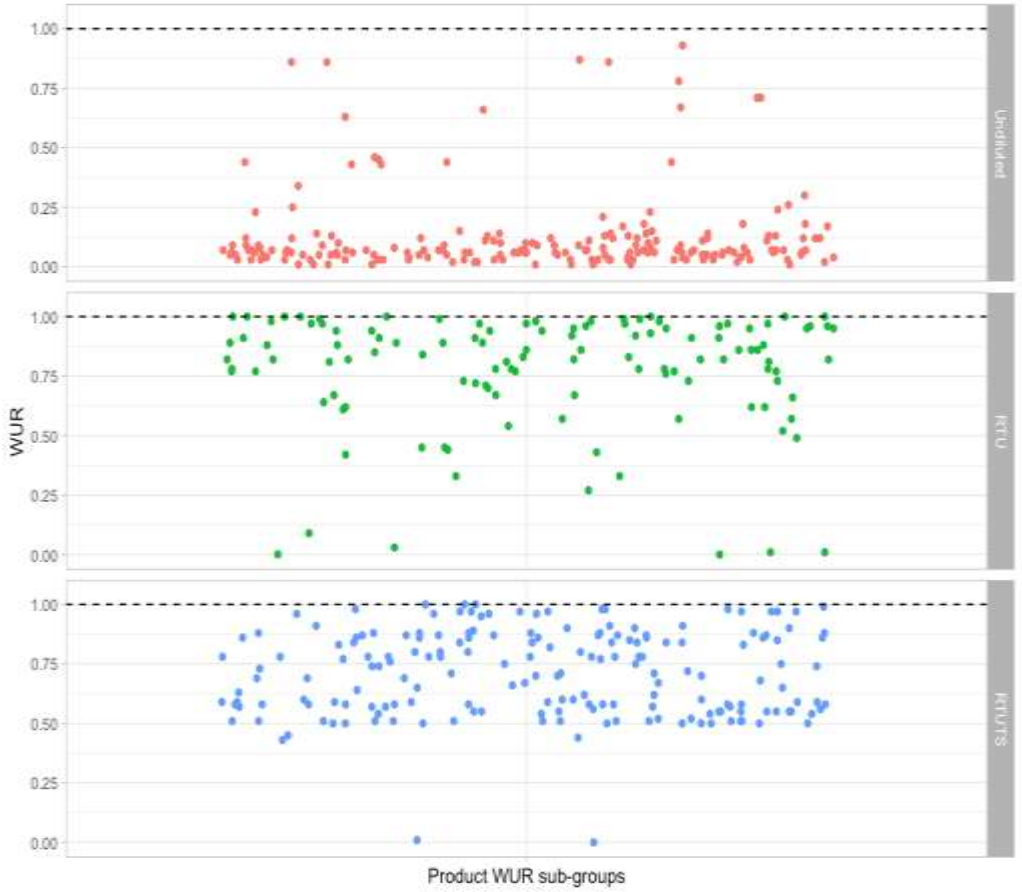
European Commission

9. Packaging – WUR (HSC)

WUR (g/l cleaning solution)

Product type	Acronym	Existing	TR1	TR2	Number (n)	Data Analysis	Other ecolabels	Stakeholders
Undiluted		15	1.0	*2.0*	197	1.8	1.2 (BA)* 30 (NS)**	5.0
Ready-to-Use	RTU	150	150.0	*140*	117	143	150 (BA)* 150 (NS)	
Ready-to-Use with trigger spray	RTU-TS	200	175.0	*170*	182	172	NA	

* Common threshold but set by product sub-group (e.g. APC, KC, …)
** Concentrated for refile; at least x10 times diluted

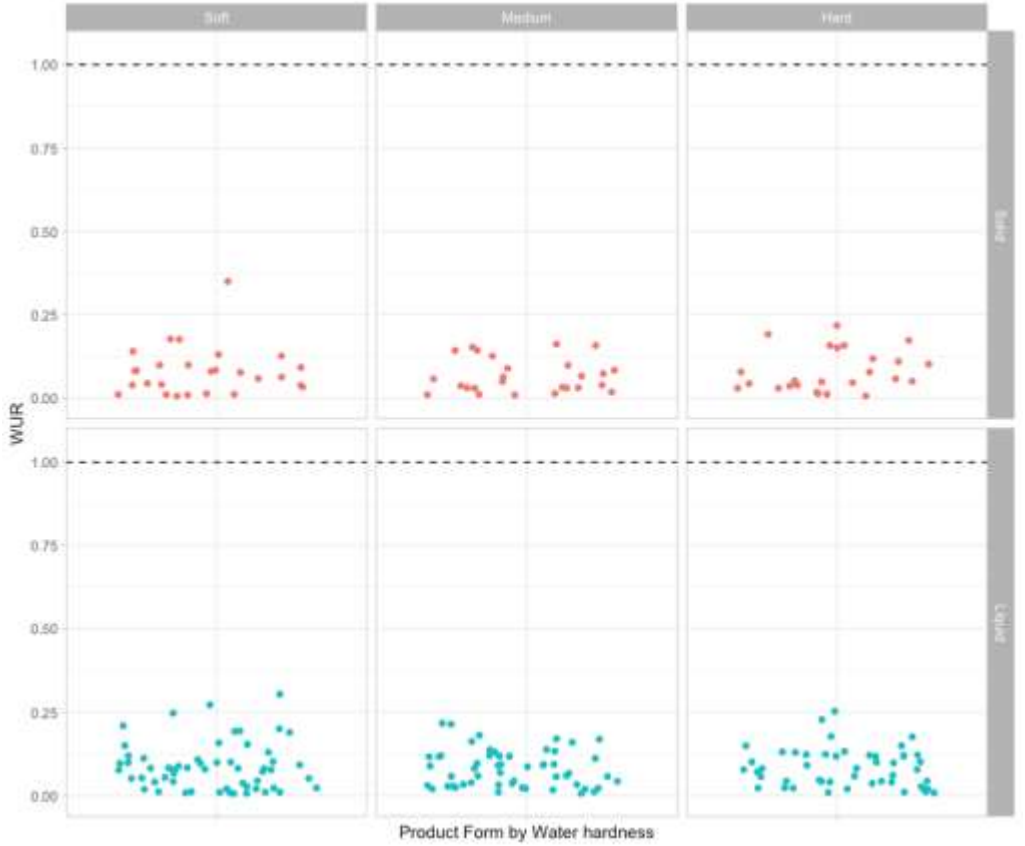


European Commission

9. Packaging – WUR (IIDD)

WUR (g/l washing solution)

Product type	Water hardnes	Existing	TR1	TR2	Number (n)	Data Analysis	Other ecolabels	Stakeholders
IIDD (powder)	Soft	*0.80*	0.8	0.08	27	0.08		
IIDD (powder)	Medium	*1.40*	1.0	0.14	26	0.11		
IIDD (powder)	Hard	*2.00*	1.4	0.24	25	0.14		
IIDD (liquid)	Soft	*1.00*	1.8	0.15	57	0.22		
IIDD (liquid)	Medium	*1.80*	2.0	0.22	54	0.24		
IIDD (liquid)	Hard	*2.50*	2.5	0.30	49	0.30		



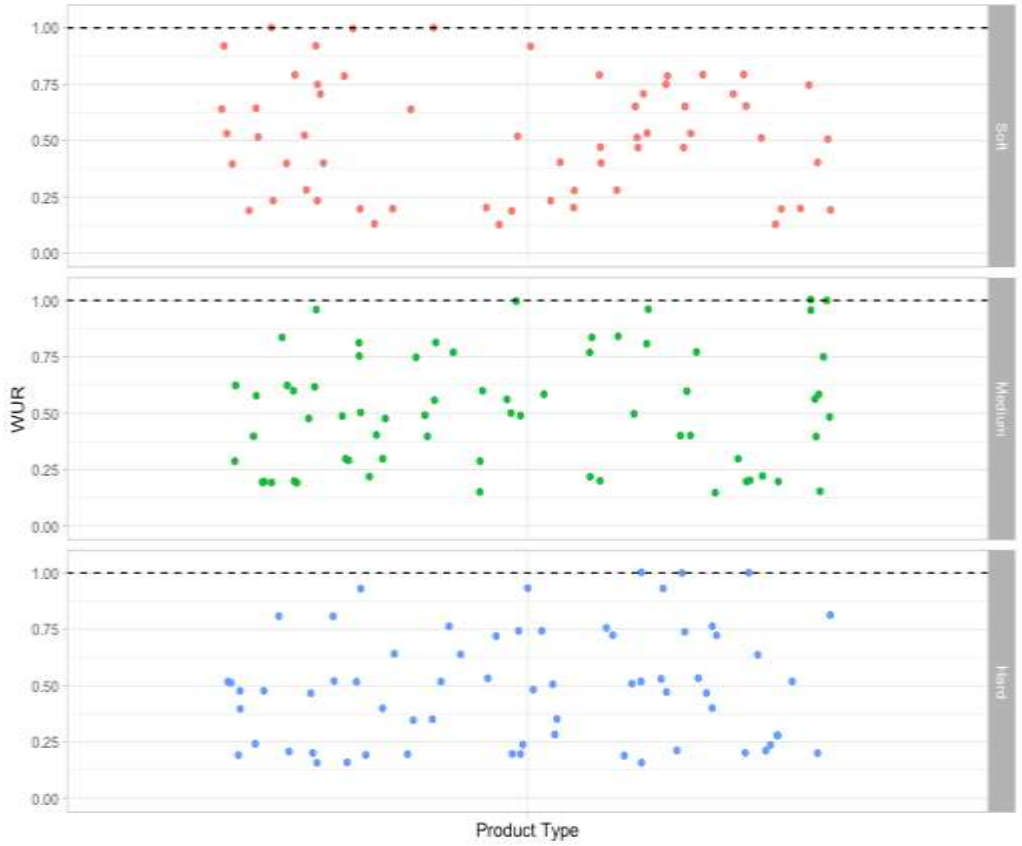
European Commission

9. Packaging – WUR (IILD)

WUR (g/kg laundry)

IILD¤	¤	¤	¤
Water·hardness¶ Product·type¤	Soft¶ <·1,5·mmol·$CaCO_3$/l¶ (g/kg·of·laundry)¤	Medium¶ 1,5–2,5·mmol·$CaCO_3$/l¶ (g/kg·of·laundry)¤	Hard¶ >·2,5·mmol·$CaCO_3$/l¶ (g/kg·of·laundry)¤
Powders¤	~~1,5~~·1.1¤	~~2,0~~·1.5¤	~~2,5~~·1.8¤
Liquids¤	~~2,0~~·X.XX¤	~~2,5~~·X.XX¤	~~3,0~~·X.XX¤

Assumption – if format not specified, then powder (solid) as most stringent limit.



Question 87 (Q87) – Considering that for IILD the analysis could not differentiate between solid and liquid forms, how feasible is it to apply the proposed WUR thresholds for solid IILD products to liquid forms? Additionally, could you provide data on WUR specific to liquid IILD products to further inform this analysis?

Additional data needed for liquid IILD

European Commission

9. Packaging – WUR ; Question recap.

Question 85 (Q85) – Do you agree with the proposed threshold for the different product groups? If not, please specify the product group(s) and provide the reasons for your disagreement

Question 86 (Q86) – Would it be possible to increase the ambition level for Dishwasher Detergent by reducing the threshold from 2.2 g/wash to 2.0 g/wash, aligning with the Blue Angel (BA) standards and the initial EU Ecolabel proposal? Please share your thoughts and any concerns you may have regarding this adjustment.

Question 87 (Q87) – Considering that for IILD the analysis could not differentiate between solid and liquid forms, how feasible is it to apply the proposed WUR thresholds for solid IILD products to liquid forms? Additionally, could you provide data on WUR specific to liquid IILD products to further inform this analysis?

Question 88 (Q88) – Please, share any other comments/suggestions you deem relevant about this criterion providing reasons supporting them.

9. Criterion Packaging Take-back system

TR2 Proposed sub-criterion (x) packaging take-back systems	
ALL	If the product is delivered in packaging that is part of a take-back system for a product, that product is exempted from the requirements set out in points (*WUR*), ~~and~~ (*Design for Recycling*) and (Recycled material content) of Criterion X (Packaging).
ALL	*Assessment and verification:* the applicant shall provide a signed declaration of compliance along with relevant documentation describing or demonstrating that a take-back system has been put in place for the packaging.

- Question 89 (**Q89**) – Do you agree with the proposed changes and the exemption criteria for products in plastic packaging within the take-back system? If not, what are the reasons for your disagreement?
- Question 90 (**Q90**) – Please, share any other comments/suggestions you deem relevant about this criterion providing reasons supporting them.

9. Criterion Packaging Take-back system

TR2 Proposed sub-criterion (x) products sold in spray bottles	
HSC	Sprays containing propellants shall not be used. Spray bottles shall be refillable and reusable.
HSC	*Assessment and verification:* the applicant shall provide a signed declaration of compliance along with relevant documentation describing or demonstrating how the spray bottles that are part of the packaging can be refilled.

- Question 91 (**Q91**) – In your experience with the EU Ecolabel, can you provide information on how the current requirement is interpreted?
- Question 92 (**Q92**) – Do you believe that the current criterion wording should be modified to be clearer and avoid misinterpretation? If yes, what changes would you suggest?
- Question 93 (**Q93**) – Please, share any other comments/suggestions you deem relevant about this criterion providing reasons supporting them.

Questions / Comments?

European Commission

10. Criteria “Automatic dosing systems” + "User information" + "Information on EU Ecolabel"

European Commission

10. Automatic dosing system criterion

IIDD, IILD¤	For multi-component systems, the applicant shall ensure that the product is used with an automatic and controlled dosing system.¶ In order to ensure correct dosage in the automatic dosing systems, customer visits shall be performed at all premises using the product, at least once a year during the license period, and they shall include calibration of the dosing equipment. A third party can perform these customer visits.¤
IIDD, IILD¤	*Assessment and verification:* the applicant shall provide a signed declaration of compliance along with a description of the content of customer visits, who is responsible for them and their frequency.¤

Resource – intensive / impractical requirement (especially business to consumers)

Question 120 (Q120) – Would you support removing this criterion? If not, could you provide specific suggestion (ideally as legal text wording) on how to simplify this criterion?

Question 121 (Q121) – Please, provide any other comments that you deem relevant to any aspect of this section.

European Commission

10. User information criterion (I)

ALL¤	The· product· shall· be· accompanied· by· instructions· for· proper· use· so· as· to· maximise· product· performance·and·minimise·waste,·and·reduce·water·pollution·and·use·of·resources.·¶ Unless· otherwise· specified· in· the· subsequent· sub-sections,· these· instructions· shall· be· provided· via· sales· packaging· (on,· attached· or· inside· it)· or· be· available· via· a· web-link· or· QR· code· directing· to· a· website·and/or·to·a·document·(e.g.·technical·datasheet)·containing·such·information.¶ These·instructions·shall·be·legible·or·include·graphical·representation·or·icons·and·include·information· on·the·following:¤
ALL¤	(a)····Dosing·instructions¶ The· applicant· shall· take· suitable· steps· to· help· consumers· respect· the· recommended· dosage,· making· available· the· dosing· instructions· and· a· ~~convenient~~ dosage· system· (e.g.· caps)· compatible· with· such· instructions·(e.g.·caps·graduation·reflecting·dosing·instructions).¤
DD¤	Dosage·instructions·shall·include·information·on·the·recommended·dosage·for·a·standard·load.¤
HDD,· DD¤	Dosage· instructions· shall· include· the· recommended· dosage· for· at· least· two· levels· of· soiling· and,· if· applicable,·the·impact·of·the·water·hardness·on·the·dosing.¶ If· applicable,· indications· of· the· most· prevalent· water· hardness· in· the· area· where· the· product· is· intended·to·be·marketed·or·where·this·information·can·be·found·shall·be·provided.¤
HSC¤	The·following·text·shall·appear·on·the·packaging·of·RTU·products:·'This·product·is·~~not~~·solely·intended· for·use·on·~~a·large~~·small-scale·cleaning·(small·surfaces;·"spot·cleaning")'.¶ Dosage· instructions· shall· include· the· recommended· dosage· ~~for·at·least·two·levels·of·soiling~~· and,· if· applicable,·the·impact·of·the·water·hardness·on·the·dosing.¶ If· applicable,· indications· of· the· most· prevalent· water· hardness· in· the· area· where· the· product· is· intended·to·be·marketed·or·where·this·information·can·be·found·shall·be·provided.¤
IIDD,· IILD¤	This·requirement·does·not·apply·for·multicomponent·products·to·be·dosed·with·an·automatic·system.¶ Indications· of· the· most· prevalent· water· hardness· in· the· area· where· the· product· is· intended· to· be· marketed·or·where·this·information·can·be·found·shall·be·provided.¤
LD¤	Dosage·instructions·shall·include·information·on·the·recommended·dosage·for·a·standard·load·for·at· least·two·levels·of·soiling·and·on·the·impact·of·the·water·hardness·on·the·dosing.¶ Indications· of· the· most· prevalent· water· hardness· in· the· area· where· the· product· is· intended· to· be· marketed·or·where·this·information·can·be·found·shall·be·provided.¤

Aim – embracing digital means to provide required information to user

Logic – IF required at the time of using the product, it has to be on/attached/inside the sales packaging

Clarifications – made for best understanding

Question 122 (Q122) – Do you support the new wording enabling alternative means to provide information to users?

European Commission

10. User information criterion (II)

ALL	(b) Packaging disposal information The ~~primary~~ sales packaging shall include information on the reuse, recycling and correct disposal of this packaging. Information on the reuse, recycling and correct disposal of any other packaging associated with the product shall be made available to users.
~~DD, HDD, HSC,~~ IIDD, ~~IILD~~	(c) Environmental information A text shall appear on the ~~primary~~ sales packaging indicating the importance of using the correct dosage and the lowest recommended temperature in order to minimise energy and water consumption and reduce water pollution.
HDD, HSC	(c) Environmental information A text shall appear on the ~~primary~~ sales packaging indicating the importance of using the correct dosage ~~and the lowest recommended temperature in order~~ to minimise energy and water consumption and reduce water pollution.
DD	(c) Environmental information A text shall appear on the ~~primary~~ sales packaging indicating the importance of using the correct dosage and the lowest recommended temperature in order to minimise energy and water consumption and reduce water pollution. Related to the former, a text shall indicate the importance of using the dishwasher "eco"-cycle programme for best environmental performance.
IILD	(c) Environmental information A text shall appear on the ~~primary~~ sales packaging indicating the importance of using the correct dosage and the lowest recommended temperature in order to minimise energy and water consumption and reduce water pollution. If the final product contains peracetic acid and hydrogen peroxide as a bleaching agent and is classified and labelled, a text shall appear on the ~~primary~~ sales packaging or technical product sheet stating that the classification and labelling is due to peracetic acid and hydrogen peroxide which degrade into non-classified substances during the washing process
LD	(c) Environmental information A text shall appear on the ~~primary~~ sales packaging indicating the importance of using the correct dosage and the lowest recommended temperature (which shall not be higher than 320 °C) and full loads in order to minimise energy and water consumption and reduce water pollution.
ALL	(d) Special information and/or precautions Precautionary information deemed as conducive to safer use shall appear on the sales packaging (e.g. contains *X ingredient*). Any other information that have been verified and validated by the Competent Body (e.g. claims about the product) may be disclosed/provided to users.
ALL	*Assessment and verification:* the applicant shall provide a signed declaration of compliance along with a sample of the product label. In addition, it should provide all the necessary information to verify the information provided via digital means (e.g. web-link or QR code).

Question 124 (Q124) – Do you support the extension of the scope on requiring information about packaging disposal?

Question 125 (Q125) – Do you support making reference to the eco-cycle as part of the DD product group *environmental information* section?

Question 123 (Q123) – Do you support addition of section *d) Special information and/or precautions*? Do you have any suggestion for improvement?

European Commission

10. Information appearing on the EU Ecolabel

LD¤	——→ Limited·impact·on·the·aquatic·environment,¶ ——→ Restricted·amount·of·hazardous·substances,¶ ——→ Tested·for·wash·performance·at·~~32~~0·°C·(*).¶ (*)·If·the·product·was·tested·at·15·or·20·°C·in·Criterion·7,·the·applicant·may·change·the·temperature·indicated·accordingly.¤
~~DD,~~ ~~HDD~~ ALL¤	——→ *Assessment·and·verification:*·the·applicant·shall·provide·a·signed·declaration·of·compliance·along·with·a·sample·of·the·product·label·or·artwork·of·the·packaging·where·the·EU·Ecolabel·is·placed~~,·together·with·a·signed·declaration·of·compliance~~.¤

Change associated with scope changes (reverting back to 20C)

Redundant test removed

Question 127 (Q127) – Please, provide any other comments that you deem relevant to any aspect of this section.

European Commission

10. Automatic dosage; User information; Information appearing on the EU Ecolabel – Questions recap

Automatic dosage system

Question 120 (Q120) – Would you support removing this criterion? If not, could you provide specific suggestion (ideally as legal text wording) on how to simplify this criterion?

Question 121 (Q121) – Please, provide any other comments that you deem relevant to any aspect of this section.

User information

Question 122 (Q122) – Do you support the new wording enabling alternative means to provide information to users?

Question 123 (Q123) – Do you support addition of section *d) Special information and/or precautions*? Do you have any suggestion for improvement?

Question 124 (Q124) – Do you support the extension of the scope on requiring information about packaging disposal?

Question 125 (Q125) – Do you support making reference to the eco-cycle as part of the DD product group *environmental information* section?

Question 126 (Q126) – Please, provide any other comments that you deem relevant to any aspect of this section.

Automatic dosage system

Question 127 (Q127) – Please, provide any other comments that you deem relevant to any aspect of this section.

European Commission

Questions / Comments?

European Commission

11. Conclusions & Next Steps

11. Conclusion, next steps and closure of the meeting

FEEDBACK – Written comments **DEADLINE 03/04/25**

- **TR2 –** Written comments only via BATIS
- **PR2 –** via email (JRC-B5-DETERGENTS@ec.europa.eu)

PLEASE – Comment in the corresponding section/question

NEXT STEPS - **3rd draft criteria version** – expected Nov 2025 (**next EUEB**)

European Commission

Questions / Comments?

European Commission

Thank you !!!!!

European Commission