2nd Ad-Hoc Working Group (AHWG) meeting on the revision of EU Eco-label criteria for detergent products

DAYS 1 & 2
12th and 13th March 2025

Hybrid meeting
(Webex and *In-person* - Brussels)

Presentation about policy and project background, product group scope and definitions and revised criteria proposals

Minutes of the meeting

Prepared by: Viegand Maagøe (Renata Guimaraes, Shane Donatello and Mariana Cipriano) and JRC (Alfonso Lag Brotons, Maria Grazia La Placa and Paula Perez Lopez)

Contents

Participants

A.I.S.E., International Association for Soaps, Detergents and Maintenance Products
ACTION PIN
ADELMA (detergent association) Spain
ADEME France
AFIDAMP
AFNOR Certification
AISE/Diversey
AMAEE (SERRPA)
AMFEP, Association of Manufacturers and Formulators of Enzyme Products
Asevi Home Brands S.L.
ATQ Quimyser S.L.
Avery Dennison
BASF SE
BIOCOOP SAS
Borregaard
Büfa Cleaning GmbH&Co.KG
BUZIL-WERK Wagner GmbH & Co. KG
CB of Lithuania
Cefic - The European Chemical Industry Council
Center For Testmaterials (CFT)
CEPSA Quimica, S.A
CESIO (the European Committee of Organic Surfactants and their Intermediates)
Chelab srl
Chemische Fabrik Kreussler & Co. GmbH
CHIMICA HTS
CHRISTEYNS
Colgate Palmolive
DALLI-WERKE GmbH & Co. KG
Danish Consumer Council
DG ENVIRONMENT
DG GROW
DIE UMWELTBERATUNG
Direcció General de Canvi Climàtic i Qualitat Ambiental
Directorate General for Economic Activities (DGAE)
DR.SCHNELL GmbH & Co. KGaA
DSM-firmenich
Ecolab Germany
Ecolabelling Denmark
Ecolabelling Finland
Ecolabelling Sweden
Ecotur, Conselleria d'Agricultura, Medi Ambient i Territori, Illes Balears
Elopak ASA
ENDEMIC BIOTECH, S.L.
Energy and Environment Agency, Republic of Latvia
Environment Agency Estonia
Environment State Bureau of the Republic of Latvia
EUROFINS ATS
European Consumer Organisation BEUC
European Environmental Bureau
EUROTAB OPERATIONS
Evonik Operations GmbH

EYREIN INDUSTRIE
Federal Environmental Agency
Federal Public Service Health, Food Chain Safety and Environment
FHER
fit GmbH
FPS Public Health, Belgium
Groupe Paredes Orapi
Hagleitner Hygiene International
HeiQ
HTS BIO / Règlementation
IFF
Italian Institute for Environmental Protection and Research, ISPRA
Italmatch Chemicals SpA
Johannes Kiehl KG
JOINT RESEARCH CENTRE (JRC)
Kao Corporation
Kingfisher
Lallemand
LANXESS Deutschland GmbH
McBride plc
Metal Packaging Europe
Ministry of Environment, Waters and Forests
MINISTRY OF ENVIRONMENTAL PROTECTION AND GREEN TRANSITION
Ministry of Territory, Housing and Ecological Transition - Generalitat de Catalunya (Spain)
Ministry of the Environment of the Czech Republic
Moeve
Nopa Nordic A/S
NOVAMEX
Novonesis
Persan
Plastics Recyclers Europe
Polish Competent Body (Polish Centre for Testing and Certification)
Probiotic Group Luxembourg
RAL gGmbH
Reckitt
Sasol Italy S.p.A:
Seitz GmbH
Senzora B.V.
SMK
Solenis
Spectro BV
Stockmeier Chemie GmbH & Co. KG, Germany
Syensqo
Titanium Dioxide Manufacturers Association a sector group of Cefic, Brussels
Unilever
UPM Raflatac Finland
Van Dam Bodegraven
Vandeputte
Viegand Maagøe
VKI: Verein für Konsumenteninformation
Werner&Mertz GmbH
Wetrok AG

Zschimmer & Schwarz Mohsdorf GmbH & Co KG

Note to readers:

The meeting was held in hybrid format with a physical meeting in Brussels that was streamed live via the WEBEX platform. For each agenda point, a short presentation was given by the JRC, after which participants requesting the FLOOR (either using the flags on their desk in the meeting room or via the chat function on WEBEX) intervened providing oral comments which then were addressed by the JRC. Interventions by the JRC (presentation & replies to comments) are denoted with blue font while those by the participants (comments/feedback) are denoted in black font

DAY 1 afternoon – Agenda

Day 1: 12th March 2025		
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 mins)	15:50 – 16:05
5.	Assessment and verification + "Reference dosage" + criterion "Dosage requirements"	16:05 – 16:30
6.	Criterion: "Biodegradability"	16:30 – 17:30

Point 1. Welcome by JRC

The JRC welcomed all the participants and informed them about the meeting being recorded only for internal use by JRC and the project team. It was explained that minutes of the meeting would be published later, but that comments would be anonymised and only the names of participating organisations would be presented in the minutes, with no names of specific representatives or their email addresses. The agenda for the two-days and practicalities about how to request the floor and contribute to discussion sessions were explained (basically to write "floor" in the chat and wait for the chairman to give you the floor). The project team were also briefly introduced.

Point 2. Introduction, political objectives of the EU Ecolabel and process description

The JRC gave an introduction to the EU Ecolabel framework, what it includes, which aspects the EU ecolabel is addressing and the benefits to applicants. The full set of criteria is set to expire on 31 December 2026[1]. The timeline of the revision process was then presented, detailing steps taken to date (i.e. prior to the 2nd AHWG meeting). Firstly, a stakeholder consultation exercise had already taken place in the form of a focused questionnaire. This plus the background research conducted and compiled in the form of the preliminary background report (PR), led to the 1st draft technical report (TR1) containing initial proposals for revised criteria. The PR and TR1 were published prior to and discussed during the 1st AHWG meeting in March 2024. Following the 1st AHWG meeting, working sub-groups were formed to discuss specific criteria areas in detail (*Fitness for Use - FfU, Microbial containing products - MCP, Packaging (PACK)*). During February 2025, an updated PR report (PR2) and the 2nd draft technical report (TR2) were published, alongside other supporting documentation to the 2nd draft criteria proposal and sub-AHWGs. The content of TR2 was the main focus of discussions in this 2nd AHWG meeting, after which further revisions of the technical report and rounds of stakeholder commenting were envisaged prior to the initiation of the final comitology processes. The final proposal of new criteria is scheduled for Q2 of 2026.

Point 3. Update of the preliminary background report

The JRC presented the highlights of an updated version of the preliminary background report (PR2) that incorporated further evidence, particularly in relation to primary data on detergent product formulations for life cycle assessment and previously identified research gaps. It started with the legislative landscape surrounding the revision of the EU Ecolabel criteria for detergents, stressing how dynamic it is and placing as a highly relevant example, the developments in the ongoing revision of the detergent regulation. In terms of market data, laundry detergents were the product group with the highest sales value, while surface cleaning products held the largest share of licensed products within the EU Ecolabel scheme. The PR2 also includes updated PEF scores for the six screening studies carried out, resulting from the use of new product-specific data. Despite this update, the main conclusions remain broadly the same as the initial

[1] During the presentation the date indicated was wrong (31 June 2026). Criteria validity expires, as now indicated, on the 31/12/26.

findings from earlier version of the PR. Additional assessments on human health and environmental hazards associated with detergent ingredients were carried out and integrated into the PR2. These included a review of updated critical dilution volume data in the DID list and detailed screening of CLP classifications of preservatives, fragrances, and surfactants that can be used in detergent products. Finally, the JRC mentioned that documentation and evidence shared by stakeholders had been reviewed and reflected in the PR2 and that written comments on the contents of PR2 could be submitted.

No comments were made by stakeholders at this point.

Point 4. Scope and definitions

In terms of **product group names**, the JRC explained that a proposed shift from the term "industrial and institutional" to "professional" was widely supported, although final alignment will ultimately depend on terminology used in the revised Detergent Regulation, once adopted.

In this 2nd draft criteria proposals, **scope** discussions focused on the inclusion of in-wash stain removers and microbial-containing products; the exclusion of ready-to-use (RTU) formats; and the reduction of the washing temperature at which a laundry detergent is efficient (In TR1 proposed from 30 to 20 degrees Celsius).

In-wash stain removers were not proposed for inclusion due to inconclusive evidence on environmental benefits, yet this option remains open if suitable evidence can be found. Microbial-containing products were proposed for inclusion, recognizing the potential benefits despite uncertainties associated with safety (eg environmental risk) and performance (limitation/absence of suitable standardized methods). RTU products were not excluded due to broad stakeholder support for their continued inclusion. Laundry detergent efficiency temperature was reverted back to 30°C due to potential trade-offs in performance at 20°C. Finally, new text was proposed for addition to each product scope indicating that products claiming a biocidal effect are excluded in order to clarify that any declared or intended biocidal effect cannot be part of the EU Ecolabel.

In terms of **definitions**, the following terms have been refined for clarity: *"ingoing substances"*, *"impurities"* and *"composite packaging"*. The definitions for "ingoing substances" and "impurities" have been aligned with those for EU Ecolabel paints and varnishes and now set clear thresholds for impurities, both in ingredients and in the final product, with no grey areas in between. The definition of composite packaging has also been updated to align with the newly adopted Packaging and Packaging Waste Regulation, and most elements of this definition are proposed to be included in the user manual.

Then, several new terms have been introduced to align with recent legislation, enhance clarity and/or improve implementation, such as those related to packaging (*"opaque", "recycled material", "recycled content", "post-consumer materials"* and others (*"abrasives"*, *"renewable material"* and *"sustainable sourcing")*. The new definition of abrasives has been proposed due to the lack of sector-specific standards and to ensure consistent application in criteria, especially in relation to aquatic toxicity assessments. Finally, updates on sustainable sourcing definitions aim to provide greater clarity on expectations for compliance.

The remaining definitions have been not updated, but questions were posed to stakeholders about some particular definitions (i.e. *"microplastics" and "nanomaterials").*

Regarding microplastics, while current definitions follow the REACH amendment, discussions are ongoing about whether to lower the threshold for particle size distribution and whether to include soluble and biodegradable microplastics under the definition. It is proposed to consider expanding the scope by reducing the threshold percentage, which would increase the number of substances classified as microplastics. Additionally, stakeholders were invited to comment on whether all polymers should be included, regardless of their origin. In the context of nanomaterials, a possible reduction in the threshold from 50% to a lower percentage is under discussion, which would affect how many substances fall within the definition. Stakeholders were encouraged to provide feedback on all proposed changes.

On the scope: Several stakeholders expressed strong support for maintaining ready-to-use (RTU) products within the scope, recognizing their significant market share and user convenience. There was also broad agreement with the decision to retain the 30°C requirement for laundry detergent efficiency, with many considering the previously proposed reduction to 20°C as technically unfeasible and potentially detrimental to product performance.

Additionally, the inclusion of ultra-concentrated consumer detergents in the scope was recommended by multiple stakeholders. Such formats are considered to offer substantial environmental benefits, particularly by enabling refill systems that reduce water consumption and packaging waste. Similarly, stakeholders from the professional sector advocated for greater recognition of ultra-concentrated formats used in institutional settings, emphasizing their potential for reducing the carbon footprint in applications such as hospitality and large-scale cleaning operations.

Regarding microbial-containing products, stakeholders generally supported their inclusion within the scope, particularly for laundry detergents and hard surface cleaners, where such products already exist on the market. Stakeholders

emphasized that such products offer environmental benefits by reducing the need for conventional chemical ingredients. However, questions were raised about the exclusion of other product groups, such as dishwashing detergents. Stakeholders noted that microbial cleaners could also be effective in these areas and recommended expanding the scope accordingly. Otherwise, the rationale behind their continued exclusion should be clearly provided.

In response, the JRC explained that inclusion decisions were based on market availability and evidence of product functionality. Where no such evidence exists, inclusion has not been proposed. However, stakeholders were encouraged to submit further data to support broader inclusion across product categories.

Concerns were also raised regarding the safety and risk assessment of microbial ingredients. Stakeholders stressed the importance of comprehensive safety evaluations beyond QPS (Qualified Presumption of Safety) status, noting that QPS applies primarily in food-related contexts and may not be directly transferable to detergents. The need for clear and transparent safety criteria was emphasized.

Regarding the explicit exclusion of “biocidal products” from the scope, there was clear support from some Member State representatives for explicitly excluding products that make biocidal or antimicrobial claims from the scope of EU Ecolabel detergents. Stakeholders emphasized the importance of including this exclusion clearly in each criteria document in order to prevent misinterpretation and confusion.

The JRC acknowledged these comments.

On the definition of “ingoing substances” and “impurities”: There was broad support for the increased clarity in the definitions of ingoing substances and impurities. Some stakeholders endorsed the adoption of thresholds based on detection limits rather than fixed concentration values. However, several comments from industry stakeholders opposed the impurity threshold of 0.1% for ingredients, stating that a limit of 1.0% would be more pragmatic, as is the case with Nordic Swan ecolabel criteria. The main practical challenge cited was in the sourcing ingredients that are free of unintended constituents at such low levels (0.1%). Some stakeholders called for exemptions for impurities inherent to raw material processing, provided they are technically unavoidable and do not compromise product safety or performance. The main differences can be that: (i) impurities due to unintended constutuents that originate from cross-contamination in the production line, and (ii) known or previously unknown impurities in raw materials. Since it is not mandatory for suppliers to provide information on all impurities in ingredients down to 0,1% in other policies and regulations, information on impurities in small concentrations in ingredients at that level, and also in the final product at 0,010%, is therefore challenging to obtain..

The JRC acknowledged the points and also highlighted a lack of specific examples to support any proposals to treat or define differently impurities , especially the mentioned “technically unavoidable” impurities, assuming this being feasible from a a legal perspective.

On more specific ways of dealing with impurities: A number of comments referenced the EU Ecolabel for cosmetics as a possible model for managing potentially hazardous impurities, suggesting that detergents could adopt similar thresholds for high-risk substances, even if not as stringent overall. However, concerns were raised about the feasibility of implementing strict impurity thresholds similar to those in place for EU Ecolabel cosmetics, especially given that detergents use technical-grade ingredients while cosmetics use food grade ingreidents. Some stakeholders recommended applying different thresholds based on the hazard classification of substances—proposing stricter limits for substances of very high concern (SVHCs), carcinogens, mutagens, and reprotoxic substances. Others suggested considering the “severity” of the type of substances (in terms of hazard classification) and the exposure (possible dermal contact; e.g. residues in: washed clothing [LD]; items washed [DD or HDD] or; surfaces cleaned [HSC]) for setting potentially stricter limits to substances likely to be in more contact with users to reduce the likelihood of any potential effect (e.g. fragrances, optical brighteners in LD).

Considering known impurities, a request was made to ignore these when carrying out calculations for critical dilution volume (CDV) and biodegradability. The main reason is that test results of ingredients with these impurities already reflect the effects of these impurities or by-products, therefore there would be potential double-counting of their effect if the intrinsic CDV and biodegradability values of known impurities or by-products are counted.

In response, the JRC acknowledged that further work is needed to balance implementability with safety assurance. Stakeholders were encouraged to provide specific examples and ingredient-level data to inform a feasible yet robust approach.

On the definition of microplastics: Stakeholders expressed general support for strengthening restrictions on microplastics, including the exclusion of soluble microplastics. Some stakeholders noted a growing market trend toward replacing solid microplastics with soluble forms and recommended addressing this in the criteria. An NGO representative supported also banning soluble microplastics, referring to an Austrian study of 250 detergent products, where 40% of them have no plastics/microplastics. The same stakeholder also stated that they would support the reduction

of the particle size threshold from 50% to 10%, in line with more precautionary approaches already in place in some countries, such as France.

Concerns were raised about potentially conflating water-soluble films, such as those made from PVOH, with microplastics. Stakeholders emphasized that these films are biodegradable and should not be classified as microplastics under the REACH definition. The report acknowledged this distinction and committed to ensuring it is maintained in the criteria.

On the definition of nanomaterials: Some stakeholders proposed reducing the particle size distribution threshold for nanomaterials from 50% to 10%, citing precautionary principles and alignment with national regulations. The issue remains under discussion, and no definitive position has yet been adopted.

On packaging-related definitions: Stakeholders generally welcomed the alignment of packaging-related definitions with the newly adopted Packaging and Packaging Waste Regulation. However, questions were raised about how to classify materials derived from captured CO_2 and chemically recycled plastics under the proposed definitions for renewable and recyclable content. Some stakeholders proposed refining these definitions to better reflect modern recycling technologies and material origins.

Further discussions on these topics were postponed to the following sessions for more detailed consideration.

On other new/updated definitions: Stakeholders responded positively to the new and refined definitions related to abrasives and composite packaging.

Point 5. Assessment and verification, reference dosage and dosage requirement criteria

The JRC explained that recent updates in the criteria document aim to improve assessment and verification procedures, clarify definitions, and refine dosage requirements.

One key addition in the general **assessment and verification** text allows substances without a CAS number but registered under REACH with an EC number to be used for identification purposes. Additionally, any change in suppliers must be notified to competent bodies, and feedback is being sought on whether a specific notification timeline should be explicitly defined to streamline verification processes.Another topic under discussion was the definition and handling of "no limit" substances. A note in the table specifies that no limit refers to detection thresholds, except for impurities, which are allowed up to 0.01% by weight in the final formulation. However, stakeholder feedback indicated uncertainty over whether this should instead be defined explicitly as "limit of detection", given the variability of analytical methods. As such, Question 13 seeks input on the preferred wording—whether to remove “no limit” in favour of "limit of detection," include stricter impurity conditions, or retain the current footnote with revised language.

The **general structure of criteria** across product groups remains largely consistent with TR1, though a more user-friendly format has been introduced with draft annexes per product group, aimed at improving readability and legal clarity. The latest update reflects the inclusion of additional product groups regarding microorganisms and that packaging take-back systems now apply horizontally across all product categories.

In terms of **reference dosage**, no major structural changes were made, but a clarification has been added to define “worst case” usage scenarios with IILD products, aligning with the fitness-for-use principle. Regarding specific **dosage requirements**, feedback was received about tightening or loosening the limits. In the case of dishwasher detergents, stakeholders noted the impact of water-soluble foil packaging (e.g., contributing 0.5 grams) on overall dosage calculations. These contributions could affect performance or environmental assessments. In Questions 15 and 16, input is requested on whether to adjust the dosage reference values: for laundry detergents, from 12.2 to 15 (less strict); for dishwasher detergents, from 16 to 15 (stricter, for single-function products).

An aggregated analysis based on recent license holder data was used to support the initial dosage proposals for both product categories, but feedback remains open for further refinement.

The discussion within this presentation block (point 5) focused on three main areas: requirements for declaring ingoing substances, notification of changes to suppliers and formulations, and dosage thresholds for laundry and dishwasher detergents.

On the declaration threshold for ingoing substances: One of the central issues raised was the proposed requirement to declare all ingoing substances regardless of concentration, a shift from the current threshold-based approach (e.g. above 0.01% concentration). Several stakeholders expressed concern that the new proposal could create excessive verification workload. Many ingredients, such as surfactants and polymers, can break down into numerous low-concentration components that typically lack DID numbers. Tracking these minor constituents and obtaining toxicity data could become highly burdensome for manufacturers and certification bodies, especially when their contribution to toxicity (e.g., CDV or biodegradability) is negligible.

It was proposed to retain a quantitative threshold, such as 0.01% (or even lower, e.g., 0.001%), to avoid impractical requirements and ensure a manageable verification process. The idea is to allow certification bodies to focus efforts only on ingredients that may materially impact environmental criteria, while still allowing flexibility to request further data in exceptional cases.

It was acknowledged by JRC that even low-concentration substances could impact certain toxicity parameters, and that there is merit in maintaining a pragmatic balance. The concern about verification workload was noted, and the suggestion of retaining a threshold is under consideration.

On the notification of Changes (Question 12): The discussion also covered whether a specific timeline should be defined for notifying competent bodies when there are changes to suppliers or formulations.

Most stakeholders agreed that a specific timeline is not necessary. Instead, it was emphasized that notification must be made before any changes are implemented, and approval must be received from the competent body prior to use. There was general consensus that clarity on the sequence of approval is sufficient, and that adding a strict timeline may not be beneficial.

On the clarification of footnote language (Question 13): Stakeholders discussed the footnote in the table defining "no limit" for ingoing substances, with an exception for impurities up to 0.01%. The term "no limit" was found to be ambiguous, especially since limit of detection varies with analytical methods. There was a suggestion to either reword the footnote more precisely or to clearly state that no ingoing substances should be present above detection limits, except for impurities. Options proposed for rewording include:

- Replacing "no limit" with "under detection limit".
- Clearly stating impurities are allowed up to 0.01%, while all other substances must remain below limit of detection.
- Including derogation provisions for quantifiable substances under 0.01% when necessary.

Feedback was noted by the JRC and will be considered when refining the wording of the footnote to ensure clarity and practicality in implementation.

On dosage requirements (Questions 15 and 16): Feedback was also collected on whether to revise the proposed dosage thresholds for laundry detergents and dishwasher detergents.

For Laundry Detergents (Question 15) a proposal was discussed to increase the threshold from 12.2g/kg to 15g/kg. Mixed feedback was received, where some stakeholders supported increasing the threshold to 15g, one one of them added that, for liquid laundry detergents, 12.2g is similar to the 55ml standard for AISE, and moving to 15g would mean being less ambitious than the industry standard. Other stakeholders favored retaining the current 12.2g, arguing that it is sufficiently selective yet achievable, and represents an appropriate balance between ambition and feasibility.

For Dishwasher Detergents (Question 16) a proposal was discussed to decrease the threshold from 16g to 15g per wash (for single-function products). General support was expressed for the revision, stating that most existing certified products already fall within this range. Stakeholders presented compelling arguments on both sides. The feedback will inform further review of whether dosage thresholds should be adjusted to reflect practical implementation while maintaining environmental stringency.

The JRC encouraged stakeholders to provide additional evidence and examples to further refine and finalize these proposals in the upcoming criteria development stages.

Point 6. Biodegradability criterion

The JRC explained that the intention of the revised criterion is to minimize the environmental impact of detergent products, particularly their effects on the aquatic environment. This is achieved through stricter biodegradability requirements for key ingredients, primarily surfactants and other organic compounds. In previous criteria, the focus was on aerobic biodegradability. In the second draft, a significant change has been proposed: surfactants must now also be anaerobically biodegradable. This decision was made after considering both supporting and opposing arguments, with the conclusion that requiring anaerobic biodegradability would enhance the environmental robustness of the EU Ecolabel.

A new requirement (under clause *b))* has also been introduced to address the biodegradability of water-soluble films and foils, aimed at ensuring that these films and/or the synthetic polymers contained within, also meet acceptable biodegradability standards.

Additionally, organic substances not classified as surfactants are now addressed under a different clause (formerly it was *b),* now it is *c)*. While the essence of the clause remains the same, some adjustments have been made based on updated data analysis by the JRC.

About biodegradability of surfactants, while it is acknowledged that aerobic degradation is often more relevant in real-life conditions, some surfactants may still pose risks in anaerobic environments, especially if aerobic degradation pathways are bypassed. Moreover, several existing ecolabel schemes already require anaerobic biodegradability, indicating that this requirement is feasible and can be met by compliant products. The technical team emphasized that exceptions to the anaerobic biodegradability requirement could be considered on a case-by-case basis for specific surfactants offering proven environmental and/or performance advantages.

In terms of biodegradability of water-soluble films, the requirement includes flexibility in how assessment can be conducted (at the film or polymer level), the use of recognized test methods (OECD methods as per existing criteria plus others such as ISO 14851/14852), as well as enabling flexibility by allowing the use of alternative scientifically valid test methods previously accepted by CBs. For the ISO methods, a carbon balance is required to ensure accurate estimation of the extent of biodegradation.

Alongside the other updates in this criterion, in terms of organic substances (aNBO, anNBO), a detailed data analysis process was conducted to assess the feasibility and environmental relevance of proposed thresholds and a provision was added to potentially exempt specific non-surfactant organic substances from the anaerobic biodegradability requirement if justified by their environmental and functional benefits.In general terms, these additions aim to harmonize with requirements set in other ecolabel schemes (e.g.Nordic Swan).

About the JRC data analysis, common to other criteria aspects, a focused questionnaire was circulated to collect data from license holders. The basic unit for data analysis was a unique combination of formulation and packaging, with inputs anonymized by source, and data with insufficient granularity/quality being excluded. The data were used to assess compliance with current thresholds, comparing each data point's value against the existing criteria limits to evaluate the distribution and range of results. Descriptive statistics, such as the third quartile value were used to determine whether the proposed thresholds would still be achievable by the majority of products. For completeness, these values were compared with thresholds used in other ecolabel schemes and the first draft proposals. Visual plots and tables in the technical report provide an overview of how different product groups perform relative to current and proposed thresholds. In cases where data were insufficient or assumptions had to be made (e.g. for product form or water hardness), the most stringent threshold was applied to maintain conservative estimates. This was particularly relevant for industrial and institutional products, where multiple variables such as product format, water hardness, and soiling level introduce complexity in determining dosage and biodegradability performance. In some instances, simplification is proposed, such as applying a single threshold regardless of water hardness, where the same value already applies across water conditions. Stakeholders were invited to provide further input on whether such simplifications are appropriate, or whether separate thresholds based on product categorization would be more meaningful. Finally, inputs were especially welcomed for certain product groups (i.e. HDD and IILD) and/or formats (i.e. for LD - light-duty laundry detergents and stain removers) where data gaps persisted. The technical team emphasized that this consultation is crucial to ensure that criteria remain both environmentally ambitious and practically achievable.

Related to clause *a)* & the anaerobic biodegradability of surfactants: Several stakeholders raised concerns regarding the feasibility of requiring anaerobic biodegradability for all surfactants. Participants emphasized that the availability of test data is currently very limited, and the testing procedures themselves are both costly and time-consuming. Many suppliers of surfactants currently used in EUEL detergent products do not routinely conduct anaerobic biodegradability tests, making compliance with the proposed requirement particularly challenging.

The same issues about a lack of anaerobic biodegradation were confirmed for professional detergent products, where in-depth consultations were made with surfactant suppliers. It was also highlighted that certain complex surfactants—especially those used in professional detergent formulations such as industrial laundry products—may inherently lack anaerobic biodegradability. In this context, the application of a uniform requirement across all surfactants was seen as problematic.

As an alternative, some stakeholders proposed using the octanol-water partition coefficient (Kow) as a proxy indicator to assess biodegradability in cases where direct testing is impractical. Stakeholders raised the point that implementing the proposed requirement could result in the loss of approximately 30% of surfactants from the DID list, despite many of these having otherwise acceptable environmental profiles. Other stakeholders looked at the DID list situation from the other perspective, pointing out that about 50% of the surfactants in the new DID list already have acknowledgements of anaerobic biodegradability and another 30% that could be anaerobically biodegradable but have simply not been tested yet, thus being perceived positively. Another point raised was the need to expand the DID list to include more anaerobically biodegradable surfactants. Stakeholders advocated for further populating the list to help facilitate compliance and ease verification burdens.

Several suggestions were put forward to address these concerns. These included allowing exemptions for specific surfactants, extending the allowable test periods, incorporating alternative verification methods, and applying a more holistic and flexible approach to assessment. Additionally, it was suggested that professional and household detergent products should be treated separately, given their differing performance requirements and formulation complexities.

In response, the technical team acknowledged the practical challenges and recognized the current limitations in data availability. Expansion of the list of surfactants in the DID list was seen as being beneficial for streamlining verification processes. They confirmed that the proposed criteria allow for flexible testing methods and longer incubation periods to accommodate slower degradation kinetics. Furthermore, the team expressed openness to considering justified exemptions on a case-by-case basis and encouraged stakeholders to provide detailed written feedback. All suggestions and data would be carefully reviewed as part of the ongoing evaluation of thresholds and exceptions to ensure both environmental integrity and practical feasibility.

Related to clause *b)* & the test methods for water- soluble films: Further discussions were held regarding the test methods for soluble films, with stakeholders raising concerns about the suitability of existing biodegradability test protocols for complex materials like water-soluble films and polymers. It was noted that the current standard methods may not be adequately designed for these types of substances and may require adaptation and further validation before being used as a standard requirement in criteria implementation.

In response, the technical team clarified that methodological flexibility is already integrated into the proposal, and they welcomed additional feedback and data from stakeholders to ensure the applicability and robustness of verification methods for such materials.

Related to clause *c)* & … … the thresholds for Anaerobic Biodegradability or organic substances (aNBO, anNBO) in Specific Product Types:

Several concerns were raised by stakeholders regarding the feasibility of the proposed thresholds for anaerobic biodegradability in specific product types. By matching the limit of the **highest dose scenario** (e.g. highest degree of soiling and water hardeness) the dosage can be multiplied by a factor of 2 or 3. Stakeholders pointed out that the newly suggested biodegradability thresholds for certain products—such as toilet gels, sanitary cleaners, and ready-to-use cleaners—appear to be overly stringent. A specific issue highlighted was the use of xanthan gum, a commonly used thickener in toilet gel formulations (WC gels), which is not anaerobically biodegradable. As a result, meeting the new threshold requirements would be virtually impossible without compromising the performance and functionality of these products.

A Member State representative added that the proposed **thresholds for aNBO and anNBO in several applications for HSC products** were excessively ambitious, specifically citing APC, KC, WC. One concrete proposal regarding limits was presented for RTU toilet cleaners, where the aNBO should be increased from 1.5 to 2.0 g/L and also increased for anNBO (which was now proposed at 5.0 g/L, much lower than the previous limit of 35.0 g/L. Conversely, the limits for undiluted sanitary cleaners (of 0.1 and 0.5 g/L for aNBO and anNBO were considered as fine, of even insufficiently ambitious). She proposed that the thresholds be revised to allow the continued use of key ingredients essential for product performance.

In response to these concerns, the technical team thanked stakeholders for the specific examples in feedback and encouraged more of this type of feedback. The team also acknowledged the challenges and invited stakeholders to submit further data and written inputs to help evaluate the practicality and feasibility of the proposed thresholds. The team emphasized the importance of achieving a balanced approach that maintains environmental ambition while also considering the realities of testing costs/timescales, product formulation and application constraints.

The issue of aNBO and anNBO **threshold simplification** for professional products (IIDD and IILD) by **no longer varying limits by water hardness** was also brought forward by several stakeholders, including the main EU detergents industry representatives, who stressed that water hardness varies significantly across regions. Therefore, adopting a single biodegradability threshold regardless of local water conditions (e.g., soft, medium, or hard) is not considered appropriate, particularly for professional and institutional products. It was suggested that thresholds continue to reflect water hardness distinctions to maintain relevance across different usage contexts.

The technical team agreed with this observation and indicated that the threshold structure would be revisited, with a view to reintroducing water hardness distinctions, especially in the context of professional sectors where the variability is most impactful.

Finally, it was clarified that while the process remains open to continued stakeholder input, some areas of the criteria development will begin to close as the revision process reaches a more mature stage. Nonetheless, all contributions will continue to be carefully considered to ensure the criteria are both environmentally robust and practically implementable.

DAY 2 morning – Agenda

Day 2: 13th March 2025		
Morning session 09:00h – 13:00h CET		
No.	**Item description**	**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 mins)	11:00 – 11:15
4.	Criterion: ”Restricted substances”	11:15 – 12:30
5.	Criterion: ”Sustainable sourcing”	12:30 – 13:00
	Lunch (1 hour 30 minutes)	13:00 – 14:30

Point 1. Welcome

The JRC welcomed participants and presented the agenda for the day and requested attendees to sign the participant list in order to compile a list of represented organisations and informed them that the meeting would be recorded solely for the purpose of the minutes.

Point 2. Criterion on toxicity to aquatic organisms

The JRC presented the concept of critical dilution volume (CDV) and how the value is calculated based on agreed ingredient data from Part A of the DID list or from specific ingredient data via Part B of the DID list. It was explained that the TR2 proposals were based on detergent product-level data received from industry, including existing EUEL license holders.

How the product-level data is treated, and the limitations of the data received were also mentioned. In the slides, data plots were shown in the same manner as with the biodegradability criterion – with each data point expressed as a coefficient of the corresponding EUEL limit in the 2017 criteria. Descriptive statistics, such as the third quartile value were used to determine whether the proposed thresholds would still be achievable by the majority of products. and placed in a broader context in tabular format where the 2017 limits were compared side-by-side with the TR1 proposal, the TR2 proposal and equivalent limits in Blue Angel and Nordic Swan criteria. This type of data presentation in the slides is a common approach used for the other data-driven detergent criteria.

Specifically on CDV again, it was flagged that some sub-categories of products only had very limited data to analyse (i.e. HSC (KC undiluted; WC undiluted); LD (Stain remover); DD (Rinse aid); IIDD (Pre-soaks)); and in some cases it was not clear what format of the detergent product was being referred to (e.g. powder or liquid laundry detergent) and in this case, worst-case assumptions were made. It was asked if it would be practical for liquid and powder LDs to have the same limits for CDV. Participants were then reminded of the targeted questions embedded in TR2 about this topic (Q18-Q24) which reflect areas where the JRC would particularly like to receive input on.

In response to the general request from JRC for more data, an industry association representative stated that their members will provide more data, especially regarding professional products, and especially because they believe the drop in proposed CDV values in TR2 for these products (ca. 50%) is very large. Specifically with IILD limits, it was stated that a distinction in limits for different water hardness is still needed and that data would be provided on this by members as well. The same stakeholder also asked if data sent to the JRC should be in the form of the full EUEL excel file or just as a compilation of CDV values. The JRC welcomed all data, the more detailed the better, but if submitted as a compilation of CDV values, it should be clear which data points correspond to which categories and associated limits. The JRC proposed sharing a template for harmonised data inputs collection.

Regarding Q19 on CDV values for RTU and Undiluted HSC, an EUEL license holder stated that the CDV limit for RTU is too high already and so they would not support aligning undiluted CDV values with these already-too-high RTU values. A Member State representative stated that they were not in favour of a combined limit for RTU and Undiluted products because it would always be much easier for the undiluted products.

Regarding Q20 on CDV limit ambition levels, an EUEL license holder proposed 300,000 for RTU APC as a compromise between the 350,000 proposed in TR1 and the 250,000 proposed in TR2. One Member State representative stated that their current licenses, which only covered some of the product categories, complied with the new proposals

but that there were also split views amongst the industry about the CDV limit proposals (some wanting even lower limits, some supporting new proposals and some wanting higher limits). Another Member State representative was appreciative of the closer alignment of limits with Nordic Swan limits but stated that there was still a big difference between the some of the HSC CDV values in Nordic Swan and the EUEL proposals. The more ambitious Nordic Swan limits are met by quite a lot of products and, a closer look at formulations of these products will normally show colorants and fragrances as having a big effect on total CDV value. An online participant said that the CDV proposal for Undiluted APC (13,000) was too restrictive because it would drastically reduce the amount of fragrance that could be used. Another stakeholder made a case for the use of colorants in HSC products, so that the risk of accidentally mixing incompatible chemicals can be reduced via colour coding. The JRC asked if this stakeholder referred predominantly to professional products, which it confirmed was the case.

Regarding part of Q21 and Q24 on distinctions between CDV limits due to water hardness in IIDD and IILD criteria, an industry stakeholder stated that not all industrial facilities have systems in place to soften the feed water and so the different CDV limit values should remain in place. This point was echoed by other stakeholders. The JRC mentioned that preserving current criteria threshold split by water hardness seemed the option more widely supported based on the comments shared so far.

Point 3. Criterion on excluded and restricted substances (part 1 of 2: part a(i))

The JRC presented the background to where the requirements on horizontal restrictions or exclusions of certain hazardous substances comes from (Articles 6(6) and 6(7) of the EUEL Regulation).

Regarding the specific exclusions, it was clarified that this always refers to "ingoing substances", because impurities cannot always be known or even reliably detected at certain very low levels. The biggest changes were the introduction of specific exclusions related to alignment with EU Taxonomy DNSH criteria, the addition of CAS numbers to excluded chemicals for better clarity, the exclusion of more formaldehyde releasers (in line with Blue Angel) and some minor updates. The need for some clarity on the compatibility between the Annex XVII restriction from the EU Taxonomy DNSH, the horizontal CLP restrictions in EUEL criteria and other specific exclusions in the EUEL criteria was mentioned (citing the situation with nonylphenol as an example). It was also explained how the proposal to exclude all category 1 and 2 EDs would take time to have an effect while the evaluation procedures under the REACH Article 59, BPR and PPPR processes go forward. Such substances will eventually be listed in Annex VI to the CLP Regulation, which should be the official reference point.

EU Taxonomy DNSH exclusions: A Member State representative asked if the introduction of the EU Taxonomy DNSH exclusions were introduced for policy coherence reasons (i.e. will be implemented regardless) or is it something that can be removed or adapted to make it clearer to apply for both Competent Bodies and applicants. Uncertainties were highlighted regarding the feasibility of compliance, particularly concerning the provision of information by producers and suppliers.

JRC explained that they are in contact with colleagues who work in more detail with EU Taxonomy to understand exactly what substances are being referred to and how assessment and verification is being done for this already.

Preservative exclusions: A surfactant producer cautioned against more extensive exclusions on preservatives because ingoing substances in ingredients are also ingoing substances in the final product, presuming no chemical modification takes place, which should be the case with preservatives used in supplied surfactants. The point about residual preservatives in supplied raw materials was echoed by another industry stakeholder and another specific example (traces formaldehyde in the supplied sequestering agent, MGDA) was cited by other industry expert. Historically, preservation has had to shift from formaldehyde-releasers to isothiazolines, and now from isothiazolines to something else. Another industry expert pointed out that phenoxyethanol is generally a good preservative, but that other options are becoming fewer and fewer and a suite of PT6 solutions need to be available to producers – for example to help prevent microbial resistance from developing. There is no universal preservative that works well for all detergents. For example, one specific limitation of phenoxyethanol is that it is generally needed in relatively high concentrations and may be detrimental to polycarboxylate surfaces at those concentrations. Other industry experts emphasised concerns about the lack of preservation options, especially from the I+I perspective. Therefore, the industry wanted to know if the JRC could develop a "white list" for preservatives, and if such a list would be exhaustive or indicative only. Inadequate preservation of water-based products will lead to more spoilage and thus extra environmental impacts via wasted products. Another industry stakeholder asked about quaternary ammonium salt preservatives and if a derogation would be made since it is not readily biodegradable but is by far the most effective preservative available for laundry capsules. A minor comment was added by another industry stakeholder that formic acid should not be treated in the same way as formaldehyde releasers because it is effectively a carboxylic acid and does not release formaldehyde. The JRC pointed out that if any preservatives are being banned but which are considered as necessary, then a formal derogation request should be submitted – the request form should already be available on

BATIS. It was also explained that the EUEL criteria tend to focus on “black lists” rather than “white lists”. In either case, specific input and clear justifications from industry is essential here.

Endocrine Disruptor (EDs) exclusions: An industry representative requested that only category 1 ED substances be explicitly excluded (because category 2 ED substances are only “suspected” of being ED and the assessment process can be complex). In talks with producers and suppliers, apparently some small amounts of category 2 EDs are being used, albeit in levels that are too low to need to be declared in SDSs. This comment on EDs was echoed by other industry stakeholders. To the contrary, a Member State representative clearly stated that they would also like category 2 EDs to be excluded. The JRC explained that the category 2 EDs have to be screened in the same way as the category 1 EDs in line with CLP Regulation– this is already in place for EUEL absorbent hygiene products. And there is a list approach used for EUEL cosmetics - although making such a list for detergents would not be easy. It will take time for these restrictions to come fully into effect while the classifications are formally adopted.

Nanomaterials: One question was asked about the situation for nanomaterials and why there is one approach with paints (no specific exclusion due to a lack of certainty and lack of harmonised definition) and another for detergents, where nanomaterials are defined and banned.

Point 3. Criterion on excluded and restricted substances (part 1 of 2: part a(ii))

After responding to questions on specific exclusions, the JRC continued their presentation, now focusing on restrictions on P content and presenting the data received from industry. All data was far below the existing limits for LD, DD, HDD and HSC products, while very few data were obtained for stain remover (SR) and rinse aid (RA) products. The majority of data points indicated a P-content equal to zero for HDD and some HSC (e.g. WC and APC) products, that the TR2 proposals include some zero P requirements and almost zero P limits. Data for IILD and IIDD did show relatively more P, but were still far below the existing limits. Data for RA in IIDD indicated zero phosphorus content, for multicomponent system and IIDD the results obtained from the data analysis were the same. In the case of IILD only limited data were available for the analysis The ban of alkyl phosphonic acid derivatives that was proposed in TR1 has now been reversed in TR2 and the JRC provided the main reasons for this reversal (e.g. important in combatting water hardness, reducing re-deposition of dirt, improving stain removal in bleach-free detergents and in general being much more efficacious than other phosphates).

Regarding the VOC restrictions, the JRC explained some apparent discrepancies in the data and limits, where all data points for undiluted products were extremely low, even lower than would be expected. An open question on this was left to the attendees.

On P restrictions: An industry representative stated that the new and reduced limits of P content in I+I products were far too low. Some reduction in limits is possible, but not as drastic as the TR2 proposals, which are so low as to effectively require P-free formulas. Data would be submitted to support this argument. It was stated that phosphonic acid is by far the most cost-effective option in I+I products and, while P-free options exist, these are exclusively in the premium segments of the market. Another industry representative emphasised that good performance is especially important with I+I products due to public health concerns (e.g. laundry of restaurant tableware, hotel linen, medical devices etc.) and that a minimum amount of phosphonic acid will help ensure good performance also in regions with higher water hardness. Likewise, sufficient phosphonic acid can help ensure less limescale deposition and more efficient performance and longer lifetime of washing appliances – leading to consequential life cycle benefits. An industry stakeholder stated that P-free formulations are possible, but that LD products which use enzymes will always bring some P. An industry expert pointed out that the downsides of alternatives to phosphonic acid need to be considered as well. Alternatives are much less efficacious – which means higher quantities of chemical – which means higher costs – which means P-free products are less likely to win in procurement exercises – which is very important for professional products. As a sidenote, it was stated that there is apparently a P-deficiency in urban wastewaters in Germany, meaning that P is needing to be actively dosed to wastewater treatment plants to keep biological treatment processes within optimum parameters. An industry representative complimented by saying that the environmental impact of alternatives to phosphonic acid generally score worse from an LCA perspective too. Professional detergents are apparently only contributing about 1-1.5% of total P input to urban wastewaters according to an UBA report which can be found online. A Member State representative generally agreed with the proposed P-limits except for sanitary cleaners (HSC-SC), where further clarity was requested, and multi-component DD, where limits for hard waters are too strict. The JRC acknowledged that the current analysis on phosphorus content was based on limited data for some product groups, which may not fully represent the entire market. Stakeholders were encouraged to submit any additional data they might have, particularly concerning professional use, identified as a critical area. The JRC highlighted the importance of P from an environmental perspective and additional data was requested to justify the claims made by industry, not just on P-contents, but also justifications of the LCA-based argumentation that was presented. Specific written feedback on opinions about limits was also requested.

On VOC restrictions: An industry stakeholder stated that VOC content in undiluted products is based on the volume of diluted mixture to be used and that the differentiation between limits for undiluted and RTU formats should be maintained. Regarding the exemption of ethanol, the same stakeholder added that they consider this as essential if the lower proposed VOC limits are to be complied with. This was echoed by a Member State representative. The same Member State representative added that the VOC content for sanitary cleaners (SC) (of 10g/L) was too restrictive. A written comment submitted to the chat asked if it would be possible to indicate VOC without water, because some surfactants diluted in water are considered as VOC and some Competent Bodies may count the water fraction of the whole surfactant ingredient. The stakeholder addressed also the question related to the potential exemption of ethanol from VOC calculations stating that data will be submitted with new values aimed at possibly reducing the proposed VOC limit. The points were acknowledged by JRC and written feedback requested.

Point 4. Criterion on excluded and restricted substances (part 2 of 2: parts, b, d, e, f, h)

In relation to the sub-criterion Hazardous substances the JRC presented the minor and major changes to the criterion wording for the horizontal CLP restrictions that apply to all EU Ecolabel product groups, and that most of the wording changes have been made to align with what is also being proposed for paints and varnishes. Several minor changes have been made to the table listing restricted CLP hazard classes, and associated hazard statements. In addition, a comprehensive rewording of the Assessment and Verification text was presented. New derogations to the CLP restrictions were also presented (i.e. TiO2, sulfamic acid, benzoic acid and amidoamine residues). Moreover, the derogation of H400 for surfactants was removed. The new requirements on fragrance restrictions (part d) were presented at length, especially the new approach to restricted fragrances in mild/sensitive products. In addition, updates to the general non-bioaccumulative requirements for preservatives and colourants were presented, as well as the new proposed ban of colourants in DD, LD, HDD and HSC household products.

The JRC also presented the major revisions to proposals on restrictions/requirements relating to the use of micro-organisms in detergent products. These JRC proposals imply significant changes from those of 1st draft criteria (TR1), which were developed in dedicated discussions/work developed through a technical working sub – group (MCP sub-AHWG). As indicated in the 1st Day of this 2nd AHWG, the sub-AHWG im-plied carrying out two meetings, where feedback was collected (i.e. questionnaire) and discussion of potential proposals following JRC's further research (i.e. 2nd MCP sub-AHWG meeting). The JRC stressed that for complete understanding of the proposals made in the 2nd draft criteria proposal, both the TR2 and the MCP sub-AHWG documentation should be consulted.

On the CLP restrictions: an industry representative compared the number of CLP classifications that professional detergent products could not be classified as in the EUEL (28 in total) and compared this to Nordic Swan (only 17 in total). They asked if the EUEL could align with the less restrictive Nordic Swan approach, which allows greater freedom to formulators in the choice of ingredients, especially additives. They also said that evidence to support their arguments would be submitted in writing. The same stakeholder also requested alignment with Nordic Swan on the exemption list for LD because they exempt enzymes from both H334 and H317, while the EUEL only exempts enzymes from H317 restrictions, but some preservatives would also need this exemption, and the Nordic Swan approach is based on research in this area. A representative of the surfactant sector added that they are checking to confirm if the removal of the H400 derogation will not create any unforeseen problems. The stakeholder also highlighted that many surfactants are polymers that have not been registered, leading to a lack of uniform classification. A Member State representative requested that the clause on specific concentration limits (of lower than the general limit of 0,010%) should be reintroduced into the criterion text. The same stakeholder requested the deletion of the following clause "*The hazard statement codes generally refer to substances. However, if information on substances cannot be obtained, the classification rules for mixtures shall apply*." – arguing that information on substances is always available. An issue with the amidoamine derogation was raised by a Member State representative, who stated that a new self-classification for these substances is emerging (H410 possibly). An industry stakeholder responded by saying that this should be a non-issue if the amidoamine is less than 0,1% in a supplied ingredient, because it is technically an impurity, not an ingoing substance.

The JRC acknowledged the comments about alignment with Nordic Swan and would check if such an alignment would be possible or practical. Any further conclusions drawn by the surfactant sector on the removal of the H400 derogation would be welcome. The JRC will also look into the requests to modify the wording of the CLP criterion, but specific written input on those requests would be useful to have too.

On fragrance restrictions (part d): A Member State representative objected to the change in TR2 which now permits fragrances to be used under certain conditions in detergent products that are marked as "mild/sensitive". According to them, no products marketed as "mild/sensitive" should contain fragrances. An NGO representative agreed with this point of view. Industry stakeholders, disagreed with the automatic ban of fragrances from mild/sensitive detergent products, adding that there were many examples of hypoallergenic products on the market with fragrances and that it

is potentially confusing and not strictly correct to send the signal to consumers that all fragranced products are problematic for allergy sufferers/sensitised individuals. There are also some issues with the need to mask the "technical smell" of some chemicals, which consumers do not tend to find as coherent with any "eco" claims for a product – this is certainly an issue with French consumers according to feedback. Another industry expert offered practical experience from the times when non-fragranced products were pulled from the market due to poor consumer acceptance meanwhile their fragranced analogues obtained a good acceptance. This was echoed by another industry stakeholder who touched upon the needed perception of something "smelling clean". The industry generally supported the current TR2 proposal regarding fragrance restrictions in mild/sensitive products. Another industry stakeholder added that the "technical smell" issue is relevant also for the I+I sector, even though fragrances do not tend to remain in I+I laundered articles due to the higher temperature wash cycles and drying cycles used.

Continuing with the discussion on fragrances, one industry stakeholder claimed that further investigation with suppliers has shown that 12 new fragrance substances were classified CMR category 2 and considering that these substances are commonly used in fragrances they cannot be entirely avoided. A blanket ban on such substances would be problematic and as compromise the stakeholder suggested to ban only CMR category 1 considering that category 2 poses less impact. Similar concerns were echoed by another industry expert. They therefore requested an exemption for this case. The same stakeholder also asked how to know which substances in Annex II of the Cosmetics Regulation are fragrance allergens, because they are not flagged as such. It would be better to have a list.

On colourant restrictions: Regarding colourants, an NGO representative suggested a blanket exclusion of colourants and only exceptional cases when it is allowed should be defined (e.g. professional HSC products and for safety purposes or correct dilution guidance). A specific example of safety was provided for coloured professional HSC products, namely that a coloured acidic formulation, if insufficiently rinsed, could release toxic chlorine gas if a bleach-based product is later used on the same surface. Colourants would give a visual cue for sufficient rinsing. Colourants in toilet gels also give an important visual cue of correct dosing and coverage - these two points on safety and appropriate coverage were echoed by another industry expert and Member State representative. An industry expert welcomed the allowance for colourants to be used at least in professional detergent products but asked what should be done in cases where the same product is sold in both professional and household markets. Another industry stakeholder stated that colourants that are non-toxic and biodegradable should still be allowed because they do not make a significant contribution to the environmental impact and do not support the ban of colourants in detergent sanitary products that could limit safety role and ensure proper dosing. The stakeholder highlighted a safety concern, noting that visually, for example, an acidic, colorless bath gel may not be properly rinsed out, and if a consumer uses a bleaching agent afterward, this could automatically cause the formation of toxic gas/substances. Support was expressed by a Member State representative for using BCF and log Kow data already available on the ECHA database for demonstrating compliance because it would accelerate the application process. The JRC acknowledged the arguments in favour of colourant use and would consider these for the next round of revisions.

On micro-organisms: an industry representative asked for clarification about any requirements relating to sensitisation testing. The JRC responded that this was a developing area and that the JRC had not found specific and harmonised testing methods, thus a specific methodology is not being required in the criteria. However. the JRC highlighted that sensitisation should be considered in assessments, as per current proposal.

Point 5. Criterion on sustainable sourcing

The JRC presented the main changes to the criterion, which included the renaming of the criterion to "renewable and sustainable sourcing of raw materials" and presented some of the key research findings since TR1 was published, including the extent of coverage by different chain of custody models for sustainable palm oil, the effect of feedstock choice on individual life cycle impact categories, the shift from "other bio-based materials" to "renewable materials" and carbon accounting considerations.

On the "renewable raw material" requirements (and Q32): An industry representative expressed concerns about the requirement for annually increasing the use of renewable raw materials. It was explained that an industry association had received feedback from member companies that they consider altering formulas each year quite impractical and would increase workload for tracking changes just to comply with such a requirement. Another stakeholder shared this view, adding that the requirement was also quite vague and might not represent a level playing field for producers (e.g. disadvantageous for producers who already have high renewable contents today and have less margin to improve, and easier for those who do not). A representative of the surfactant industry confirmed that it is still too soon to be able to assess the sustainability of non-palm oil derived sources and agreed with the previous stakeholder that it is difficult to increase the renewable content of some raw materials. For example, for surfactants, part of their molecules could be bio-based and parts not, depending on availability in the market of replacements of fossil-based feedstocks with those of renewable-based sources. This could require complete reformulation of ingredients. These positions about sustainabile sourcing of other materials and issues with the increasing renewable contents were echoed by an

industry manufacturer. A Member State representative considered that the current approach to annually revised renewable contents as overly burdensome – instead, if the criterion must be kept, it should be a fixed limit that just needs to be complied with from the time that the license is awarded or when a product is reformulated. Finally, another industry stakeholder wished to emphasise that simply reducing the frequency for when the % renewable content had to increase (e.g. every 2 or 3 years instead of every year) would not fix most of the fundamental issues that producers and competent bodies have with this requirement.

On the palm oil chain of custody requirements (and Q33): An industry representative expressed support for the proposed approach to dealing with mass balance claims. This was echoed by other industry stakeholders and Member State representatives. Clarity was also sought about which certification schemes apart from RSPO would be suitable to use. A clear guidance document on how to calculate renewable material content would be welcomed, while ensuring consistency with certification body.

On the sustainable certification for other materials like coconut oil, sugarcane and soybean (and Q34-Q36): some industry stakeholders stated that the market was not ready for this yet.

The JRC acknowledged the comments and admitted that some of the difficulties highlighted by stakeholders in the 2nd AHWG meeting on the sub-criterion on renewable raw materials would require alternative solutions to be analysed in the following months. They also justified the open and gradually improving approach initially proposed in TR2 as a more flexible alternative to past problems with criteria in other Ecolabel schemes on the same topic in the past where a fixed limit was set, but was too high. They thanked stakeholders for confirming the relevance of proposing the removal of the sub-criterion on other bio-based raw material sustainable sourcing.

DAY 2 afternoon – Agenda

Day 2: 13th March 2025		
Afternoon session 14:30h – 17:30h CET		
No.	**Item description**	**Schedule**
7.	Criterion: ”Fitness for use”	14:30 – 15:40
8.	Criterion: “Packaging”	15:40 – 16:15
	Coffee Break (15 mins)	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

Point 7. Fitness for use

The JRC presented the aim and development of the fitness for use (FfU) criterion, explaining that changes were not proposed as part of 1st draft criteria (TR1) but that later dedicated discussions/work was developed through a technical working sub – group (FfU sub-AHWG). As indicated in the 1st Day of this 2nd AHWG, the sub-AHWG implied carrying out two meetings, where feedback was collected (i.e. questionnaire) and discussion of potential proposals following JRC’s further research (i.e. 2nd FfU sub-AHWG meeting). The JRC stressed that for complete understanding of the proposals made in the 2nd draft criteria proposal, both the TR2 and the FfU sub-AHWG documentation (i.e. background document and compilation of EUEL performance protocols) should be consulted.

The JRC firstly introduced the horizontal requirements, namely those applicable to more than one product group (*All product groups)*. These include the need for performance claims to be backed by tests; the extension to all PGs of a responsibility clause requiring applicants to ensure product safety; and a request for feedback on ways to harmonise the EUEL definition of "market reference product (questions 96-98). "

Amongst others, laundry detergents (LD) updates included the addition of synthetic/blended fabrics and a revised formulation for heavy-duty detergents (inclusive of new enzymatic profile). The JRC requested stakeholder input the on heavy duty detergent enzymatic profile and on light-duty detergent formulation (as still there was no candidate

found/proposed) and on the support on allowing market products as reference detergent in LD performance testing (question 103). The JRC foresees pending work on stain removers' performance protocol.

The JRC proposed new generic formulations (IEC A to P and ISO15797:2017) for industrial and institutional laundry detergents yet it noted that still were deemed as outdated according to FfU sub-AHWGs feedback. The JRC also suggested ISO 15797:2017 testing conditions a potentially suitable for IILD laboratory performance testing but feedback highlighted not being widely-representative of the varying industrial conditions. Given the former, the JRC requested input on whether to drop laboratory testing due to a lack of harmonised testing methods, the laborious verification and this type of testing not being part of other ecolabels. Finally, the JRC proposed categorizing claims "by type" (primary laundering, secondary laundering, and rinsing agents) but FfU feedback suggested to do so "by product" (Question 107).

For dishwasher detergents, the generic formulation was updated according to IEC 60436 *Type D* but stills remained outdated according to FfU sub-AHWG. In this sense, the JRC is monitoring IEC updates for potential adoption of a new generic formulation. The JRC has also restructured DD performance framework for clarity, with a dedicated section to Rinse aid, but according to feedback received this still requires further work. Finally, the JRC mentioned the structural reorganization of performance testing requirements, which was done to improve clarity.

The changes and challenges in the industrial and institutional dishwasher detergent group were similar to IILD in terms changes suggested: reference detergent as per EN 17735; re-structuring claims "by type" (then suggested by FfU sub-AHWG feedback to do so "by product").

Amongst other changes, the JRC updated the generic formulations of the hard surface cleaning product sub-groups all-purpose cleaners (according to Blue Angel ecolabel analogous criteria) and glass cleaners (according to IKW recommendation). The JRC indicated that, even if performance claims were not explicitly defined within EUEL performance protocols, the obligation for testing and supporting such claims was still in place. If explicitly quoted (as "long-lasting cleaning" claim in microorganism-based products), then requirements stated should be followed. Finally, the JRC requested input on whether to restrict testing only to *Laboratory*, given this type of test is potentially less subjective than the *User* test.

For hand dishwashing detergents, the testing conditions have been aligned with the latest (12/2024) IKW recommendations, particularly with regards to the soiling used and the generic formulation used as internal control reference. Given the lack of an updated generic formulation for EUEL HDD performance testing, the JRC proposed considering market products to be eligible as reference detergents (Question 112). It also inquired stakeholders about the suitability of using the updated IKW generic formulation as reference detergent (Q112). The JRC also proposed the possibility of using alternative soiling (if priorly approved by CBs) and to test degreasing capacity in alignment with other ecolabels and/or alternative methodologies.

The JRC finalised this topic by presenting the main questions for stakeholder feedback by product group were: All product groups (Q94 – Q100); LD (Q101 – Q104); IILD (Q105 – Q108); DD (Q109); IIDD (Q110 & Q111); HDD (Q112 – Q115); and HSC (Q116 – Q119).

On "horizontal requirements" for testing (Q94-Q95): In response to the general idea of obliging laboratory testing for all primary FfU claims (Q94), one testing expert stated a strong support for this, stating that to allow alternative means of compliance makes no sense and reduces the value of the official testing standards, which a lot of work has gone into during their development. This position was echoed by a Member State representatives, who added that it can only be for secondary claims that internal testing be acceptable. It was further clarified by an industry stakeholder that, while supporting external laboratory testing for primary claims, secondary claims must remain open to internal testing because they are not linked to any standard framework.

On the **market reference product proposal (Q96-98)**: mixed views were expressed. Regarding views against a market reference product, a testing expert, who currently manufactures some of the existing reference detergents (Light duty LD and IEC DD detergent) raised concerns that changing the approach to reference products could deteriorate the quality of the whole standard protocol. With some product categories, such as liquid light-duty laundry detergents, it is very difficult to define a reference product in the first place. The same stakeholder explained that standard reference products are used by everyone and so quantities produced are greater – but going to more targeted "market reference products" would mean smaller quantities and potentially smaller batches and greater risk of batch-to-batch variability. Nonetheless, the same expert generally acknowledged that current standard reference products were out of date and not as highly performing as products currently on the market. An industry stakeholder added that detergent products are generally considered as "FMCGs", which stands for "Fast Moving Consumer Goods". A consequence of this is the potential need for many minor changes to formulations over time and it needs to be clear under which cases is retesting required. It would be much simpler for these people to have one common standard product to compare against, even if that reference will at some point not be well-adapted to the market. Views in favour of a market reference product were provided by an industry stakeholder working in the I+I sector who stated that the reference I+I

products are sometimes decades old and are very different to what is used in the market today. This stakeholder added that reference products (multi-component or single-component) should be similar to what is on the market today and it is only this way that all of the special claims made by some detergent products can be realistically proven. A Member State representative) supported the market reference product proposal in general, but asked for clarity on how to determine compliance or non-compliance with the "sufficient sales volume" requirement and how any sales databases would be accessed and updated over time. An industry stakeholder added that the requirement for the market reference product to be in the top 5 sales could give favourable treatment to big players and hamper new companies with more innovative products.

Regardless of the positions on the reference product, the standard test swatches and stain sets for whiteness, greying etc. should be maintained. Reference was made by an industry expert to ongoing work to create new standard reference detergents and also to update the stain sets used (work led by IKW and going one step further than the AISE stain set). It was later clarified by a testing expert that the IKW stain set uses 23 stains based on consumer research and their discriminative power, these 23 stains include 12 of the 13 AISE stain sets, the only one left out being mustard, due to its limited discriminative power.

Related to Q98, one stakeholder also raised a potential issue with the market reference product regarding the requirement that it NOT be ecolabelled. A Member State representative added that at least the market reference product should not be EU Ecolabelled and this was echoed by an industry stakeholder, who added that this condition should be respected even if an EU Ecolabel product is in the top 5 for sales.

Related to Q99, a Member State representative expressed their support for increasing the number of replicates for "user tests" to 10, at least for IIDD and IILD products. An industry expert stated that 5 replicates, as is already the case, is enough to assess product comparability and extra testing is simply an additional cost and would mean it takes longer to recertify. This position was echoed by another stakeholder. However, a Member State, replied that the proposed increase in replicates refers to potential user tests that can be conducted in-house for secondary claims and not to the external laboratory tests for primary claims.

On Laundry Detergent (LD) FfU (Q101-104): An industry stakeholder expressed their support for a washing temperature of 30°C, adding that testing at 15 or 20°C can sometimes even require water cooling before the test. This was also echoed by a testing expert. However, a testing expert stated that there is a demand in the market for making washing performance claims at 20°C as well, and for this reason that option should be maintained (in addition to the standard requirement at 30°C). Specifically regarding Q103, an industry stakeholder stated the importance of having flexibility in the choice of reference product – especially since there is no standard reference LD product for pods, gels or sheet format. A lack of suitable reference products is therefore a barrier to EUEL certification for these innovative products. The same stakeholder added that even in cases where there were standard reference LDs, these were very out of date and that the LD sector is constantly evolving, to the point that a new standard reference LD might be needed every 5 years. This prompted a Member State representative to state that the rate of innovation in the sector should be a factor to take into account when deciding on the validity period of the new EUEL criteria (which is currently proposed to be 8 years).

On Industrial and Institutional LD FfU (Q105-108): A Member State representative stated that more than 850 of these products which they have certified were tested by external laboratories, representing around 80% of the total certified products – meaning that they see no problem with making external testing mandatory.

On hard surface cleaning (HSC) product FfU (Q116-119): A Member State representative expressed concerns about many lower performing alternative products like alkaline water, deionised water, oxygenated water and micro-organism-based cleaners and that they are currently able to comply with FfU requirements via "user tests" instead of more rigorous laboratory tests – so they supported compliance with FfU to be solely via laboratory tests (response to Q118). Another Member State representative stated that they were not sure what "user tests" would apply to HSC products and that they currently have 635 certified HSC products, all of which have been tested in external laboratories.

Regarding reference products, the JRC acknowledged the challenge of balancing a standardized approach to defining unacceptable performance in an evolving market. They emphasized the need to agree on a clear target for reference products in a fast-changing environment and suggested providing flexible options for defining this target.

On secondary claims and innovation, the JRC noted that market reference products could be viable but require clear agreement on acceptable standards.

Regarding washing efficiency tests, the JRC confirmed that 30°C remains the standard, though lower temperatures like 20°C are not prohibited but may involve trade-offs in terms of the chemistry involved and the quantity of chemicals needed per dose.

For test replicates, the JRC recognized that increasing the number would raise costs and suggested further discussions on the financial and time implications, especially in relation to the time required for recertification.

The JRC proposed that future discussions might be more focused, potentially using bilateral meetings or targeted questionnaires instead of larger subgroup discussions.

Finally, they highlighted the need to explore practical updates to performance standards to keep them relevant and workable for different product groups.

Point 8. Packaging – part 1

Recycled material content

The JRC introduced the criteria on recycled content and recyclability for packaging, how they have been influenced by broader EU policy, other related ecolabel requirements and stakeholder input (especially via a dedicated subgroup), and how these requirements generally aim to reduce environmental impact and promote recycled and reusable materials. The future mandatory targets (for 2030 and 2040) for recycled content in packaging set out in the recently adopted packaging and packaging waste regulation (PPWR), where also presented. The JRC highlighed an important point of the PPWR, namely that the recycled content should be calculated as an average per manufacturing plant per year, rather than on a product level basis.

The JRC outlined a key change in the scope (extension of requirement to professional products) a several changes to the terminology that are influenced by ISO 14021 and the EUEL criteria for absorbent hygiene products (i.e. a joint definition for the terms “recycled material”, “recycled content” and “post consumer material” which also indicates their relationships). Due to these new definitions, the term “PCR” or “Post Consumer Recycled” is no longer explicitly needed in the proposed criteria.

Based on data gathered for recycled content of paper/cardboard packaging, it was proposed to require 85% recycled content for sales packaging and 80% for grouped packaging with further feedback still needed regarding kraft paper. With plastics, stepwise incremental approach is proposed (before and after 2030) and each tier also has separate limits for PET (more ambitious) and for other plastics (less ambitious). The different limits for PET were justified based on data gathered. Exemptions from the recycled content requirements (i.e. pouches, plastic parts representing less than 5% of the total weight of the packaging unit, packaging used for the transport of dangerous goods and packaging that is part of a take-back system)

A new proposal was made to ban single-use plastic packaging in grouped packaging and requiring other types of plastics used for grouped packaging to achieve a recyclability performance grade of at least 95%.

The JRC also presented the assessment and verification requirements where the same key standards or their equivalents as proposed in TR1 were referred to. Regarding the assessment and verification of “recyclability”, reference was made to CEN standards, which should always be used once they are published. In the meantime, similar methods like RecyClass can be used.

On the stepwise incremental **approach to recycled content targets**: industry representatives expressed their appreciation for having a lower ambition level prior to 2030. However, two Member State representative pointed out that the higher ambition level from 2030 onwards will trigger significant additional workload for competent bodies and license holders who are dealing with hundreds of licensed products.

On the scope of recycled content requirements for professional products: industry representatives stated expanding this criterion also to professional products would be difficult for producers to meet, especially considering the design considerations for professional detergent product packaging and more ambitious WUR thresholds. The same stakehokder requested that the minimum recycled content for professional product packaging be removed, as it was in TR1 and as is currently the case in the equivalent Nordic Swan ecolabel criteria. Further arguments to support the exclusion of packaging recycled content for professional products were provided by an industry expert. The arguments centred on the fact that many professional products are classified as dangerous goods and need to be packaging in approved containers with a UN number. However, getting a UN number for containers with recycled content is extremely difficult, and the few examples out there are very expensive. Consequently, this would contribute to making EU Ecolabel professional detergent products less competitive.

On the scope of recycled content requirements - exemptions: A Member State representative stated that the manufacturing of pouches for refills is already quite challenging, so they should continue to be exempted from the requirements. The exemption for pouches was appreciated by an industry representative but should also be extended to closures as well. The same stakeholder admitted that closures could be considered as being already exempted indirectly in many products via the “*Any plastic part representing less than 5% of the total weight of the whole packaging*

unit", but this general assumption does not always apply for professional products, which have heavier closures in many cases due to dosing mechanisms or safety controls, which may account for 10%, 20% or even 30% of the packaging mass. It was therefore requested to either exempt all closures from recycled content requirements or at least exempt closures for professional products. Anotrher industry stakeholder echoed this comment, and a different industry stakeholder provided a specific example of a 1L HDPE bottle with PP lid (closure) and PP "booklet" (label) where the mass of the lid and label was higher than the bottle itself.

On terminology: one stakeholder highlighted the use of the term "cardboard packaging for liquid products", which they believed may have come from the Nordic Swan criteria and wanted to clarify that this definition also includes "liquid packaging board" and that the exemption [to minimum recycled paper/cardboard content] therefore also applies to this latter type of packaging material.

On the ambition level of recycled content thresholds: One industry stakeholder accepted that the EU Ecolabel should be more ambitious than the PPWR but the the current proposals for recycled contents prior to 2030 are very ambitious and could lead to quality issues and associated costs for manufacturers. One stakeholder stated that it would be worth looking further into the requirements on plastics, especially in terms of options with chemically recycled contents and bio-based contents. A Member State representative stated that they found the proposals for the 80% and 85% recycled contents for paper/cardboard to be reasonable but that they had not yet been able to confirm the 80% for grouped packaging with their license holders.

A Member State representative commented on the 95% recyclability performance that was placed for plastic grouped packaging within the recycled content criterion, adding that it had been discussed quite extensively already at the CB Forum. They stated that care needs to be taken with how the 95% is to be calculated, because 95% according to EN 13430 [e.g. as mentioned for absorbent hygiene products] is not the same as 95% when looking at recyclability performance grades (e.g. A, B and C). The same stakeholder requested further clarity from the JRC on this point.

On the implementation of this type of requirement: A Member State representative shared experience to date with the application of similar criteria on packaging that are in force for EU Ecolabel absorbent hygiene products. The stakeholder highlighted a scenario where sales/primary packaging and transport packaging are used together, questioning whether transport packaging could be misclassified as grouped packaging. This ambiguity, they noted, could impact the design and technical performance requirements of packaging, especially since recycled content requirements apply to sales and grouped packaging, but not to transport packaging.

Another stakeholder raised a general question regarding how the EU Ecolabel criteria would classify materials such as tensioactives or plastics derived from recycled tensioactives or captured CO_2—whether these would be categorised as "recycled materials" or "renewable materials.

The JRC answered that the technical report provides clear definitions for primary (sales), secondary (grouped), and tertiary (transport) packaging, which are essential for determining the scope of recycled content requirements. The JRC clarified that the application of recycled content requirements hinges on whether transport packaging meets the definition of grouped packaging (i.e., grouping sales units at the point of sale). However, if transport packaging does not fulfill the criteria of grouped packaging and is used solely for logistical purposes, the requirements would not extend to it. The JRC emphasized the importance of adhering strictly to the definitions outlined in the technical report to resolve ambiguities and ensure compliance.

The JRC acknowledged concerns about the feasibility of reaching recycled content targets for all plastics, questioning whether this was a general issue or specific to certain materials.

The JRC clarified that industrial packaging (e.g., professional products) is being considered for inclusion in recycled content requirements, aligning with the Packaging Waste Regulation (PPWR), which does not exclude such packaging. They also answed that a stepwise approach was proposed as a compromise to ease industry adaptation, despite potential challenges for competent bodies. The JRC remained open to revisiting this approach based on further feedback.

The JRC also highlighted that introducing a take-back system for industrial detergents packaging could reduce the need for recycled content by focusing on reuse instead.

Finally, regarding dangerous goods packaging, the JRC found the concerns raised valid and worth further exploration and requested additional written comments to assess the issue in more depth.

Design for recycling

The JRC presented significant changes made to the Design for Recycling criterion. The updates focus on enhancing the content and structure to prevent the use of material components and treatments that could disqualify packaging

recyclability and hinder recycling processes. The proposal aligns with Article 6 of the PPWR and integrates and includes additional packaging features that affect recyclability, such as material composition, colors, labels, adhesives, closures, barrier coatings, additives, and inks also in line with industry standards (e.g. Recyclass and German minimum standard). The new structure categorizes requirements by packaging type (e.g., fibre-based, pouches/plastic bags) and plastic types (e.g., PET, HDPE, PP, PE, and PP flexible films) to enhance clarity and accessibility. The JRC also highlighted the need for further data on liquid product packaging recyclability and invited stakeholders to provide feedback on the feasibility of proposed criteria.

On material requirements: An industry stakeholder stated that there is no robust solution for pouches greater than 1 litre volume that can meet the EU Ecolabel packaging material requirements. The same stakeholder also added that the allowance for up to 5% PP in PE flexibles and up to 10% PE in PP flexibles was not a high enough allowance. In general, the same stakeholder requested a more flexible approach to this criterion. A Member State representative requested that pouches be exempted from the design for recyclability requirement due to the already-complicated technical requirements that these packaging designs already face.

On label requirements: an industry representative stated that manufacturers are obliged to put more information on labels due to the need to comply with the CLP Regulation, which makes it harder to comply with any stricter limits on how big labels can be. This comment was echoed by other industry stakeholders. It was also noted by an industry stakeholder that the requirements for adhesives used on HDPE needing to be “releasable” could pose a challenge. This is due to the recent introduction of the RecyClass standard for measuring this property, which raises uncertainties about whether label suppliers will be able to comply and compile test reports within the required timeframe.This comment was echoed by a Member State representative. Another stakeholder raised a question about whether all stakeholders clearly understood how to demonstrate compliance with the adhesive requirements, as the A+V criterion text on this point lacks sufficient detail.

On colour requirements:

An industry stakeholder queried why should information in line with PPWR be required on EU Ecolabel products before it is required by the PPWR itself, they stated that the deadline should be the same for both. The same stakeholder added that it was not clear what information would be required by the PPWR exactly. A clarification was requested about the banning of direct printing on packaging (except for production codes, date codes and UFI codes) because the CLP Regulation also seems to require the commercial name and any pictograms to be directly printed too.

The JRC clarified that in the current criteria there are not specificrequirements for caps and trigger sprays. They noted that future PPWR proposals may address this components, and stakeholders were asked whether advancements in new technologies related for example to trigger spray could support specific requirements for these elements.

On label size The JRC confirmed it would double-check the proposed label size requirements and the impact of CLP labeling on packaging design, based on stakeholder feedback.

For liquid packaging, The JRC emphasized the need for additional data on the recyclability of liquid packaging (e.g., laminated materials) due to limited information on Europe-wide separation technologies. Stakeholders were invited to provide technical details to support future requirements.

In response to adhesive and label concerns, the JRC stated that they had aligned wording with existing standards (Recyclass) which already include industry-tested methods for proving compliance. They mentioned that technical groups in Recyclass are working on protocols for adhesives and labels to ensure compliance.

They also requested written feedback regarding recycled plastic density to gain more clarity on stakeholder concerns.

The JRC acknowledged concerns about large pouches (>1 liter) and the feasibility of allowing exemptions for PE/PP laminations but further investigation is needed.

Point 9. Packaging – part 2

Weight-utility ratio (WUR)

The JRC presented the criterion weight utility ratio, which ensures that the relationship between packaging mass and its function (e.g., dosage per use) is as efficient as possible. Date gathered from stakeholders was also presented in a similar manner as already described for biodegradabily (point 6 on day 1) and for toxicity to aquatic organisms (point 2 on day 2). Based on data gathered from stakeholders, new and more stringent Weight Utility Ratio (WUR) thresholds were proposed for various cleaning products and formats.

They highlighted the need for additional data on certain products, particularly stain removers for laundry and dishwasher rinse aids. Regarding dishwasher detergents, they questioned whether the ambition level could be increased, proposing to lower the threshold from 2.2g per wash to 2g per wash to align with Blue Angel standards.

For specific data points, the JRC explained that when distinguishing between solid and liquid formats was not possible, an assumption was made using the powder format. They sought stakeholder input on whether the proposed thresholds for solid and liquid packaging formats were feasible and, if not, requested alternative solutions.

Packaging take-back system

A key change discussed was the expansion of the take-back system to all product groups and that the exemption for take-back packaging extends to recycled material content requirements (in addition to the exemptions for WUR and design for recycling requirements). The further requirements for HSC spray bottles remained unchanged from TR1. A list of questions was then presented to stakeholders to help structure any feedback (Q85-Q88 on WUR, Q89-90 on updated horizontal take-back packaging exemptions, Q91-Q93 on how current requirements are interpreted about refillable spray containers for HSC).

On the proposals related to WUR: Regarding udiluted HSC products, an industry representative acknowledged the increase in the permitted WUR in TR2 (2.0 proposed in TR2, whereas it was only 1.0 in TR1). However, it was requested to further increase the WUR to 5.0 according to discussions that had taken place amongst a group of industry stakeholders. The main reasons for this increase would be: (i) there is a big difference between the ratios achievable for household products and professional products (household products can often be <1.0, professional undiluted HSC cannot); (ii) the line between professional and household use for undiluted HSC is not always clear, some products are sold in both markets; (ii) undiluted HSC products that can be used in the professional sector need heavy caps/closures to meet safety requirements and often an auto-dosing system as well. For context, the same stakeholder pointed out that the equivalent WUR in the Noridc Swan was 30.0, and in the 2017 EU Ecolabel criteria, 15.0 [so a new proposal of 5.0 would still represent a significant tightening of the ambition level]. This stakeholder concluded that they would provide more written feedback to explain why a WUR threshold of 5.0 would be needed for undiluted HSC, at least for the professional products. With regards to the WUR thresholds for IILD and IIDD, an industry representative, based on an initial check of results with member companies, requested that a more gradual drop in the thresholds be made (e.g. 25% or 50%) instead of the factor of 10 drop that has been proposed in TR2 – when compared to proposals in TR1. It was added that for IILD, the WUR is so strict that it would end up becoming a limiting factor in the dosage rate allowed and consequently washing performance for certain special IILD products – it should instead be criteria relating to chemicals (like CDV limits) instead of packaging requirements that affect the dosage rate allowed.

A Member State expressed agreement with the proposed changes, with the exception of IIDD and IILD, provided the criteria strictly apply the 'less than or equal to' condition for the specified values. The stakeholder noted that their study did not differentiate between liquid and solid products.

On the take-back system requirements: An industry expert explained that the take-back requirements are straightforward to apply for I+I detergent products when these are delivered directly to customers in IBCs [Intermediate Bulk Containers]. However, it becomes complicated when IBCs only go as far as retailers and then the retailer delivers the IILD products to industrial laundries. The retailer is not the EUEL license holder and there is no way to guarantee compliance or even getting accurate information about any packaging take-back systems of the retailer in this scenario. In some Member States, like Germany and Poland, the retailer packaging systems are not such a big issue due to broader systems in place there, but it is not clear how to deal with this issue across Europe (i.e. how to deal with not being able to control any retailer packaging take-back commitments). Another industry expert echoed these comments and added that with empty IBCs, if they were containing “dangerous goods”, which many undiluted detergent products can be considered as, then the empty IBC must have the lid closed and is legally recognised as a “dangerous good” itself. This situation places requirements on who can handle and transport IBCs and how they need to be treated – limiting the number of operators who can be involved in IBC or jerrycan take-back logistics.

On how the current requirements on refillable spray containers are applied: An industry stakeholder explained that the User Manual is quite clear that it is not mandatory to actually place refills on the market as well, but to demonstrated that the spray bottle is designed to be compatible with removal and replacement of the spray pump so that it could in principle be refilled and reused. It was suggested that this could perhaps be also explained directly in the legal text for better understanding.

In response to the concerns about the Weight Utility Ratio (WUR), the JRC acknowledged the need for further discussion, particularly regarding the trade-off between dosage (which could impact performance) and packaging mass. They suggested that a more detailed bilateral exchange might be necessary to better understand these trade-offs and fine-tune the approach.

Regarding the take-back system, the JRC admitted that they currently do not have a clear solution to the issues raised by stakeholders, especially about managing the return of packaging from retailers. However, they encouraged stakeholders to propose solutions or suggestions that could improve the requirement. The team expressed openness to receiving input and exploring possible improvements.

Point 10. Automatic dosing systems, User information and Information appearing on EU Ecolabel

Automatic dosing systems

The JRC discussed the potential benefits of automatic dosing systems, recognizing their advantages but also highlighting the challenges in verifying their use, particularly in business-to-consumer contexts. They invited feedback from stakeholders to determine if this feature truly adds value for consumers.

User information

The JRC introduced the idea of offering digital user information, allowing consumers access to important details through formats such as web links or QR codes. The aim was to provide more flexibility in sharing product information without overcrowding the packaging with text.

There were also updates to the criteria for household hard surface cleaning products and dosage instructions, with the JRC stressing the importance of clear dosing guidelines that are compatible with dosing systems, striving for consistency across all product groups.

The JRC proposed new requirements for including precautionary information on packaging to ensure safer product use. They emphasized that any claims made on the product should be validated by the competent authority before being shared with consumers, aiming to improve product safety and transparency.

Information appearing on the EU Ecolabel

Finally, the JRC noted changes in the wording for information that must appear on ecolabels, aiming to enhance clarity and ensure compliance with updated standards.

One industry expert expressed support for the idea of providing information through QR codes but cautioned that it's important to avoid information overload for consumers. They suggested that only the most crucial information should be displayed on the packaging, with additional details accessible via the QR code, to prevent overwhelming the consumer and burying the most useful information under less important information.

A Member State representative requested that these alternative methods for conveying information (QR codes etc.) should not mean the removal of key information from sales packaging (i.e. dosing instructions, proper usage instructions or disposal guidelines). They also expressed agreement with some of the proposed additions in the document, particularly regarding questions 124 and 125 on extension of the scope for requiring information about packaging disposal and on referring to the eco-cycle in DD product information, respectively. For question 126, they recommended adding clarification that the requirement for dosing instructions should not apply to certain products, such as HSC-RTU and stain removers.

The JRC acknowledged the feedback on QR codes and information overload. They emphasized that while the regulation dictates the minimum essential information that must be provided, it is up to individual companies to decide how they want to present this information. The team emphasized that the focus is on ensuring the minimum useful content is provided, but beyond that, the strategy for sharing the information is flexible.

Point 11. Conclusions, next steps and closure of the meeting

The 3rd draft criteria version and associated (e.g. TR3) documents will be published four weeks before the next EU Ecolabeling Board (EUEB) meeting in November 2025. From their publication, stakeholders will be able to submit written comments, but discussions will be limited to the EUEB level.

The JRC stressed the importance of stakeholders' input, requesting comments for this 2nd round of consultation to be submitted via the BATIS platform by April 3rd. For the preliminary report, comments can also be submitted via email. They encouraged participants to provide feedback in the relevant sections and corresponding questions to ensure meaningful responses and efficient processing.

At this point. the JRC officially closed the 2nd AHWG meeting, appreciating all attendees participation.