



Content

Day 2: Wednesday, 21st January 2015

1.	Excluded and limited substances and mixtures criteria: <ul style="list-style-type: none">- Specifically excluded substances and mixtures- H-statements based restriction- Specific limited in-going substances: Preservatives, Fragrances, etc.- Other issues
	Coffee break
2.	Packaging criteria
	Lunch break
3.	Fitness for use criteria User instructions / Professional training Claims on packaging / Information appearing on Ecolabel
	Coffee break
4.	Any other non-horizontal criteria: biocides, corrosive, etc.
5.	Summary and closure of the meeting

Fitness for use



Common approach

To be discussed at the 1st AHWG meeting

Tests shall be carried out to ensure that the product has a **satisfactory wash performance at the lowest recommended dosage** for the water hardness according to (in descent order):

- appropriate international standards (eg. modified standard EN 50242:2008)
- EU Ecolabel protocols
- well-known test procedures such as IKW procedures
- laboratory tests, or
- user tests

The tests shall be carried out at the **water temperature** stated in the **standards/protocols** or at the **lowest temperature the product claims to be effective** at.

The **test** shall be **performed by a laboratory that meets the requirements** in Appendix (to be added)


Fitness for use



Common approach

To be discussed at the 1st AHWG meeting

If a **laboratory test** is needed:

- the reference product is tested at the lowest recommended dosage that is stated on the packaging. If no dosage instructions are provided, the same dosage is used as for the test product.
- the reference product shall be tested against another consumer product.

If the product is marketed for both professional and consumer use it shall be tested against a professional product (eg HDD)

When applying for **rinse aids** in combination with dishwasher detergents, the rinse aid shall be used in the test instead of the reference rinse aid.

For **multifunctional products** the applicant must submit documentation providing the effect of the claimed functions.

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Fitness for use



Common approach

To be discussed at the 1st AHWG meeting

Assessment and verification (standards, protocols and laboratory tests):

The applicant shall provide documentation confirming that the product has been tested under the realistic conditions and following one of the above mentioned test methods. Information should be provided demonstrating:

- a) The recommended dosage at the corresponding water hardness and the lowest recommended wash temperature at which the product claims to be effective
- b) Type of spots that are representative for the kind of soiled expected in the areas where the products will be marketed
- c) The performance of the tests (all raw data from the test, test procedure descriptions, information about the reference product against which the test product has been tested: market leadership, lowest recommended dosage or dosage used (if no information is provided) and temperature, date of purchase and date of testing, etc)
- d) The product's ability to remove soiling from the surfaces or materials and the effectiveness of other products the detergent shall be used with (eg. rinse aids) (results from the test conducted by the laboratory or reply forms from the user tests)
- e) Documentation confirming the compliance within the laboratory requirements included in Appendix (to be added).

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Fitness for use



Common approach


To be discussed at the 1st AHWG meeting


Assessment and verification:

If a **user test** is performed, the applicant should provide information on:

- (a) the **way the test users were selected**, all raw data from the tests and the test procedure
- (b) **all reply forms received from the test users and the overall result** on the wash performance of the user test specified in a table/a form. The response must be rated in accordance with Appendix (to be added)
- (c) **information on how satisfied the test center** is with visit reporting arrangements and the categories rated.

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Fitness for use




Common approach

To be discussed at the 1st AHWG meeting

Proposed standards, protocols, laboratory or user tests depending on the product:

Product	Test method
LD	The revised EU Ecolabel performance test for consumer laundry detergents introduced in 2014 (20/06/2014) as a separate activity to this EU Ecolabel criteria revision. http://ec.europa.eu/environment/ecolabel/documents/Performance%20Test%20Laundry%20Detergents.pdf
IILD	Wash test clothes such as -WFK-PCMS-55 for industrial laundering processes (WFK-Cleaning Technology Research Institute, Germany). - EMPA 102 (Swiss EMPA-Test materials). -Wash clothes of DTI (Danish Technology Institute) for industrial washing processes or equivalent The measurement of secondary effects such as bleaching effect, bleaching/damage factor, ash content, greying and fluidity increase can for instance be made with multi wash test clothes and analysed according to standard ISO 4321 "Surface active agents -- Evaluation of certain effects of laundering -- Methods of analysis and test for unsoiled cotton control cloth" As an alternative to the laboratory test, a user test may be used to document effectiveness.
DD	The IKW performance test: 'Methods for ascertaining the cleaning performance of dishwasher detergents' available at http://www.ikw.org/fileadmin/content/downloads/Haushaltspflege/HP_DishwasherA_B_e.pdf or the modified standard EN 50242: Electric dishwashers for household use. Test method for measuring the performance
IIDD	Internal testing or user tests

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Fitness for use


Common approach

To be discussed at the 1st AHWG meeting

Proposed standards, protocols, laboratory or user tests depending on the product:

APC	EU Ecolabel protocols 'Framework for testing the performance of all-purpose cleaners, window cleaners and sanitary cleaners' that can be found here: http://ec.europa.eu/environment/ecolabel/ecolabelled_products/categories/purpose_cleaners_en.htm IKW framework for testing of all-purpose cleaners, window cleaners and sanitary cleaners' cleaning performance: http://www.ikw.org/fileadmin/content/downloads/Haushaltspflege/HP_EQ-Allzweck-englisch.pdf IKW performance test 'Recommendation for the quality assessment of acidic toilet cleaners': http://www.ikw.org/fileadmin/content/downloads/Haushaltspflege/HP_EQ-Allzweck-englisch.pdf
HDD	EU Ecolabel framework for testing the performance of hand dishwashing detergents: http://ec.europa.eu/environment/ecolabel/documents/performance_test.pdf The IKW performance test 'Recommendation for the quality assessment of the cleaning performance of hand dishwashing detergents' method may be applied with the an adaptation ¹⁰² : http://www.ikw.org/pdf/broschuere/EO_Handgeschirr_e.pdf

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Fitness for use


Consultation questions

Fitness for use

- Should the preference of using Standards and EU Ecolabel protocols over laboratory tests and users tests be proposed?

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User information




Common approach


To be discussed at the 1st AHWG meeting

The detergent shall be accompanied by **instructions for proper use so as to maximise product performance and minimise waste.**
 These **instructions shall be legible or include graphical representation or icons and include** information on:

- **dosing instructions for various water hardness and various levels of soiling.**
 - a) if applicable, the **recommended dilution instructions** at a normal level of soiling/normal use in ml/l should be included. A second well-known metric shall, if applicable, be given in brackets. If the packing has an efficient and convenient dosage system that can provide an equally reliable dosage, an alternative metric (eg capfuls, squirts, or other) can be used.
 - b) **information on the water hardness** or where this information can be found out shall be included or alternatively, the dosing instructions shall refer to the water hardness where the product is intended to be marketed

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User information




Common approach


To be discussed at the 1st AHWG meeting

- **recommendation on washing at the lowest temperature:** the applicant shall:
 - a) recommend washing **at the lowest temperature the product claims effectiveness** (or as **default temperature 55 50C for consumer dishwasher detergents and 40 30C for consumer laundry detergents**)
 - b) encourage users to dilute the product with cold tap water (if applicable)
 - c) recommend washing beddings and cloths at 60C if the users suffer from allergies to house dust or infectious diseases.
- **Resources saving measures:**
 - Water saving measures:
 - a) do not use running water but immerse the dishes (applicable to HDD)
 - b) wash full loads (applicable to LD, IILD, DD and IIDD)
 - **reuse, recycling and/or correct disposal packaging**

Consultation question
Should the recommendation of washing the bedding and cloths at higher temperatures if the users suffer from allergies to house dust or infectious diseases be kept?

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User information



Common approach

To be discussed at the 1st AHWG meeting

- **environmental information:**
~~using this EU Ecolabel product according to the dosage instructions will contribute to the reduction of water pollution, waste production and energy consumption~~
"In order to reduce the environmental impact of this product, always use the recommended dose, the lowest recommended water temperature (and wash full loads). This will minimize water pollution and both energy and water consumption".
- **Information and labelling of the ingredients:**
~~The type of enzymes shall be indicated on the packaging~~

The applicant shall take suitable steps to help consumers respect the recommended dosage, making available a dosage device and/or indicating the recommended dosage in a well-known metric.

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User information



Common approach

To be discussed at the 1st AHWG meeting

- **Additional user information: Cleaning products:**
 - a) dosing instructions: The primary packaging shall include information on the recommended dosage and dilution instructions:

Feedback for **a meaningful wording of this criterion for cleaning products is needed, especially regarding the heterogeneity of this group:**

 - a) ready to use vs undiluted products
 - b) Different uses and different reference units

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User information



Common approach

To be discussed at the 1st AHWG meeting

- **Additional user information: Hand Dishwasher Detergent:**

a) dosing instructions The primary packaging shall include information on the recommended dosage and dilution instructions:

- for non-professional products: in ml per 5l dishwashing water
- for professional products: in ml per liter of dishwashing water

b) **dose number (voluntary):** An indication of the approximate number of washes that the consumer can perform with one bottle is recommended but voluntary. This is calculated by dividing the volume of the product by the dosage required for 5 litres of dishwashing water for normally soiled dishes.

Assessment and verification
 The applicant shall provide a sample of the product packaging, including the label.

Consultation question

- **Is it useful to provide the dosage of HDD in ml per 5l dishwashing water for non-professional users?**
- **Should safety measures be included? (keep away from children, do not mix different cleaners, avoid inhaling spray products, etc)**

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Information appearing on the EU Ecolabel



Common approach

To be discussed at the 1st AHWG meeting

The logo should be visible and legible.
 The use of the EU Ecolabel logo is protected in primary EU law. The **EU Ecolabel registration/licence number must appear on the product, it must be legible and clearly visible.**

The optional label with text box shall contain the following text:

- reduced impact on aquatic ecosystems
- limited hazardous substances
- performance tested

Assessment and verification
 The applicant shall provide a sample of the product packaging, including the label.

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User information



Consultation questions

Consumer laundry detergents

1. Should the **recommendation of washing** the bedding and cloths at higher temperatures if **the users suffer from allergies to house dust or infectious diseases** be kept?

Cleaning products
 Feedback for **a meaningful wording of this criterion for cleaning products is needed, especially regarding the heterogeneity of this group:**

- a) ready to use vs undiluted products
- b) Different uses and different reference units

Hand dishwashing detergents

- Is it **useful to provide the dosage of HDD in ml per 5l dishwashing water for non-professional users?**
- Should **safety measures be included?** (keep away from children, do not mix different cleaners, avoid inhaling spray products, etc)

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Professional training



Common approach

To be discussed at the 1st AHWG meeting


Additional user information: Professional cleaning products:

a) **alternative 1:**
 For detergents, which are used by professional users, the producer, its distributor or a third party shall offer training or training materials for cleaning staff. These shall include step-by-step instructions for proper dilution, use, disposal and the use of equipment.
The producer shall also provide product information sheets for users.

Assessment and verification: a sample of training material containing step-by-step instructions for proper dilution, use, disposal and the use of equipment and a description of training courses shall be provided to the competent body.

b) **alternative 2:**
 withdraw the criteria.

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**Points**

Removal of criterion

To be discussed at the 1st AHWG meeting


During the last revision, a "points" criterion was introduced for LDs. It aimed to address the trade-offs in CDV, aNBO, anNBO, dosage and packaging which were thought to be required for low-temperature formulations. The scale of the trade-offs has been reduced in newer formulations – negating the need for such a criterion.

Water temperature is now addressed through Fitness For USE and User Information.

The proposed EU Ecolabel criteria encourage the use of lower washing temperature by:

- ensuring that detergents are able to efficiently wash at lower temperatures than the previous EU Ecolabel criteria sets, and
- informing users of the benefits and environmental impacts caused by using high water temperatures.

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**Points**

Consultation questions

Professional training for cleaning products

Should the criteria on professional training be kept?

Point systems

Is there any other effective way of encouraging users to wash at lower temperatures?

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