



Content

Day 2: Wednesday, 21st January 2015

	Excluded and limited substances and mixtures criteria:
1.	- 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
	Fitness for use criteria
3.	User instructions / Professional training
	Claims on packaging / Information appearing on Ecolabel
	Coffee break
4.	Any other criteria: palm oil, corrosive properties, VOCs
5.	Summary and closure of the meeting

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Sustainable sourcing

Sustainable sourcing of palm oil, palm kernel oil and their derivatives

- Surfactants can either be derived from oleochemical or petrochemical sources. Both have associated environmental impacts.
- The most commonly used surfactants from oleochemical sources are palm oil, palm kernel oil (and their derivatives), and coconut oil. The percentage used depends on market availability.
- Surfactants from oleochemical sources are often mixed with surfactants from petrochemical sources to form surfactants of mixed origin (= 50% of surfactants used in detergents and maintenance products in Europe).

2



Sustainable sourcing of palm oil, palm kernel oil and their derivatives

- Even if the raw material comes from renewable sources, there are environmental and social trade-offs (competition for arable land, etc.)
- Currently there is a certification scheme for sustainably sourced palm oil.
- A large scale certification scheme for sustainably sourced coconut oil has been announced but does not appear to be "live" yet.



Sustainable sourcing of palm oil, palm kernel oil and their derivatives

- Ingredients used in the product which are derived from palm oil or palm kernel oil must be sourced from plantations that meet the criteria for sustainable management that have been developed by multi-stakeholder organisations who have a broad based membership including NGOs, industry and government.
- **Assessment and verification:** the applicant shall provide third-party certifications that the palm oil used in the manufacturing of the product originates from sustainable managed plantations. Certifications accepted shall include RSPO (by identified preserved, segregates or mass balance) or any equivalent scheme based on multi-stakeholder sustainable management criteria. For chemical derivatives of palm oil it is acceptable to demonstrate sustainability for these through book and claim systems such as GreenPalm or equivalent.



Sustainable sourcing of palm oil, palm kernel oil and their derivatives

Consultation questions

- Should a criterion on sustainable sourcing of palm oil and palm kernel oil derivatives be included?
- Is this approach inaccessible for SMEs?



Automatic dosing systems

IILD, IIDD

No content-wise changes are proposed, except in the case of IILDs where it is proposed to include the clause related to distance.

Multi-component systems shall be offered together with an automatic and controlled dosing system.

In order to ensure correct dosage in the automatic dosing systems, customer visits must be incorporated as a normal routine for manufacturers/suppliers. These customer visits are performed at all premises at least once a year during the license period; they must include calibration of the dosage equipment. Also, a third party can perform customer visits.

In exceptional cases, customer visits may be dispensed with if the distance and method of delivery makes the visit impracticable.

Assessment and verification: *the applicant shall provide a written description of responsibility for, frequency and content of customer visits.*



HDD – corrosive properties

The product shall not be classified as a 'Corrosive' (C) mixture with R34 or R35 in accordance with Directive 1999/45/EC, or as a 'Skin Category 1' mixture in accordance with Regulation (EC) No 1272/2008.

Assessment and verification: the applicant shall provide the exact concentrations of all substances used in the product, either as part of the formulation or as part of any mixture included in the formulation, that are classified as 'Corrosive' (C) with R34 or R35 in accordance with Directive 1999/45/EC, or as a 'Skin Category 1' mixture in accordance with Regulation (EC) No 1272/2008 to the competent body, together with copies of the material safety data sheets.

→ No changes are proposed as the issue is still relevant and the verification method is applicable.



APC – Volatile organic compounds

Volatile organic compounds are released into the air from ingredients used in cleaning products, most commonly from solvents such as formaldehyde, limonene, acetone, ethanol and isopropyl alcohol.

→ In the current criteria, the definition of VOCs and their characterisation were not clear



APC – Volatile organic compounds

Proposed criterion 5

Volatile organic compounds (VOC) are defined any organic compound (compound which contains carbon) with a vapour pressure greater than 0,01 kPa at 1 atm and 20°C. The products shall not exceed the following limits of VOC:

Product type	VOC limit (% weight)
All-purpose cleaners, RTU	6 % of product as sold
All-purpose cleaners, undiluted	0,2 % of product as diluted in washing water
Window cleaners, RTU	10 % of product as sold
Window cleaners, undiluted	0,3 % of product as diluted in washing water
Sanitary cleaners, RTU	6 % of product as sold
Sanitary cleaners, undiluted	0,2 % of product as diluted in washing water
Toilet (WC) Cleaners, RTU	6 % of product as sold

Assessment and verification: the applicant shall provide copies of the material safety data sheets of each organic solvent together with details of the calculations of the total concentration of volatile organic compounds.