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**Stakeholders Consultation Document**

*Please submit the questionnaire before* ***4 August 2014*** *to:*

*JRC-IPTS-All-Purpose-Cleaners@ec.europa.eu*

*to ensure that all comments can be fully considered in this process.*

**QUESTIONNAIRE TO ANALYSE THE EXISTING SCOPE, MARKET SEGMENTATION AND ENVIRONMENTAL PERFORMANCE FOR ALL PURPOSE CLEANERS & SANITARY CLEANERS**

**1 July 2014**

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**TABLE OF CONTENTS**

[1. INTRODUCTION 3](#_Toc391034561)

[1.1 Objectives 3](#_Toc391034562)

[2. QUESTIONNAIRE 4](#_Toc391034563)

[2.1 Your contact details 4](#_Toc391034564)

[2.2 Scope and definition 5](#_Toc391034565)

[2.3 Questionnaire on currently valid criteria 7](#_Toc391034566)

[2.4 Further issues or hot spots for APCs 15](#_Toc391034567)

[2.6 Market data 15](#_Toc391034568)

[Appendix 1: Commission statements for criteria revision 16](#_Toc391034569)

1. INTRODUCTION

## Objectives

The EU Ecolabel is a key policy instrument in promoting environmentally friendly products and services. The EU Ecolabel criteria for **all-purpose cleaners and sanitary cleaners (APCs)** were adopted 28 June 2011 (2011/383/EU). Their aim is to promote cleaning detergents that represent the best 10‑20% of the products available on the EC market in terms of environmental performance considering the whole life cycle (from production, through use and until disposal). These criteria are foreseen to expire in December 2016.

The framework that sets out the EU Ecolabel criteria for APCs defines the aims of the criteria as promoting products that have a reduced impact on aquatic ecosystems, contain a limited amount of hazardous substances and have a tested performance.

There are currently criteria for each of the following aspects of all-purpose cleaners and sanitary cleaners (in the following sections APC is used as a collective term to describe both of these):

Toxicity to aquatic organisms

Biodegradability of surfactants

Excluded or limited substances and mixtures

Fragrances

Volatile organic compounds (VOCs)

Phosphorous

Packaging requirements

Fitness for use

User instructions

Information appearing on the EU Ecolabel

Professional training

This questionnaire is the first stage in the process of revising the criteria for the award of the EU Ecolabel for APCs. Its aim is to find out whether the current scope definition is still appropriate regarding the current market conditions and state of the art of the technology, and which criteria need to be amended, maintained or withdrawn. One of the goals of the revision is to obtain simplified criteria addressing the most important environmental impacts of APCs from a life cycle perspective.

**The views of relevant stakeholders are of utmost importance.**

**1.2 Confidentiality and contact details**

All responses received through this questionnaire will be treated as confidential. Where data is published, it will be in an aggregated format only. Comments will not be attributed to an individual person or organisation unless this is specifically requested.

We rely heavily on stakeholder consultation, so your time and expertise are greatly appreciated and valued.

For further information regarding this questionnaire, please contact us by writing to **Josie Arendorf** at the following e-mail address: **josie.arendorf@oakdenehollins.co.uk**.

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| **Once you have completed this survey, please email it to:** **JRC-IPTS-All-Purpose-Cleaners@ec.europa.eu** |

**Thank you for taking part!**

2. QUESTIONNAIRE

## 2.1 Your contact details

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| --- | --- |
| First name:  | Family name:  |
| Email:  |
| Company/ Organisation: Position held:  |
| Organisation type:[ ] Industry [ ] Government[ ]  Environmental Agency [ ] Trade Association[ ]  Competent body [ ]  Other (please specify)  |
| Company/Organisation details:Website Country Telephone Number  |

## 2.2 Scope and definition

The product group **‘All-purpose cleaners and sanitary cleaners’** comprises: all-purpose cleaners, window cleaners, and sanitary cleaners.

1. All-purpose cleaners comprising detergent products intended for the routine cleaning of floors, walls, ceilings, windows and other fixed surfaces, and which are either diluted in water prior to use or used without dilution. All-purpose cleaners shall mean products intended for indoor use in buildings which include domestic, commercial and industrial facilities.
2. Window cleaners comprising specific cleaners intended for the routine cleaning of windows, and which are used without dilution.
3. Sanitary cleaners comprising detergent products intended for the routine removal, including by scouring, of dirt and/or deposits in sanitary facilities, such as laundry rooms, toilets, bathrooms, showers and kitchens. This subgroup thus contains bathroom cleaners and kitchen cleaners.

The product group covers products for both private and professional use. The products may be mixtures of chemical substances and must not contain micro-organisms that have been deliberately added by the manufacturer.

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| 1. Do you agree with the existing classification of the products included in the scope? | [ ]  Yes [ ]  No | If no, please explain why and/or propose modification. |
| 2. Is the current definition appropriate and suitable for each product category? | [ ]  Yes [ ]  No | If no, please explain why and/or propose modification. |
| 3. Are there any all-purpose cleaning products which are excluded by this definition which, in your opinion, should be included? | [ ]  Yes [ ]  No | If yes, please indicate. |
| 4. Does the current definition require clarification? Is the current definition too complicated to be understood? Should the distinction between private and professional products be addressed in more detail? | [ ]  Yes [ ]  No | If yes, please explain why and/or propose modification. |
| 5. Should a list of excluded products be provided as part of product group definition?  | [ ]  Yes [ ]  No | If yes, please indicate why. |

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| **These questions are specifically addressed to the EUEB members and Competent Bodies:** 6. Please can you provide anonymised CDV values for currently EU Ecolabel products. This is required for the analysis of CDV limits. ***Please send this information by email to josie.arendorf@oakdenehollins.co.uk***7. Have producers or any other interested party had difficulty in understanding the scope of the product group, or encountered difficulties because the product was not covered within the current scope and definition?[ ]  Yes [ ]  NoIf yes, please specify:8. Have you ever denied the EU Ecolabel licence for APCs because of a product not being covered by the current scope and definition? [ ]  Yes [ ]  NoIf yes, please specify: |
| **These questions are specifically addressed to the stakeholders/licence holders:**9. Do you have any difficulty in understanding the scope of the product group?[ ]  Yes [ ]  NoIf yes, please specify: 10. Have you ever been denied the EU Ecolabel licence for APCs because of a product not being covered by the current scope and definition? [ ]  Yes [ ]  NoIf yes, please specify: |

## 2.3 Questionnaire on currently valid criteria

##### Criterion 1: Toxicity to aquatic organisms: Critical Dilution Volume (CDV)

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| The current criteria specify that the critical dilution volume of the product must not exceed the following limits (CDVchronic): |
| **Product type** | **CDVchronic** |
| All- purpose cleaners (diluted in water at manufacturers dose to create a litre of cleaning solution) | 18 000 l/1l of solution |
| All-purpose cleaners (used without dilution) | 52 000 l/100g of product |
| Window cleaners |  4 800 l/100g of product |
| Sanitary cleaners | 80 000 l/100g of product |

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| 11. Are the CDV limits effective in distinguishing between the state-of-the-art and the best environmental performing products in the APC product group?  | [ ]  Yes [ ]  No | If no, please explain why and/or propose modification. |
| 12. Is CDV the most appropriate method for assessing aquatic toxicity? If not which assessment method should be considered. | [ ]  Yes [ ]  No | If yes, please explain why and/or propose modification. |
| 13. Do private and professional products require different CDV limits? | [ ]  Yes [ ]  No | If yes, please explain why and/or propose modification. |

##### Criterion 2: Biodegradability of surfactants

The current criteria specify that the content of surfactants in the product that are aerobically non-biodegradable (not readily biodegradable aNBO) and/or anaerobically non-biodegradable (anNBO) shall not exceed the following limits:

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| The current criteria specify that each surfactant in the product shall be readily biodegradable (aerobically) |
| For anaerobically non-biodegradable surfactants (anNBO) the following limits apply:  |
| **Product type** | **anNBO** |
| All-purpose cleaners diluted prior to use | 0.40 g/100 g of product |
| All-purpose cleaners used without dilution | 4.0 g/100 g of product |
| Window cleaners | 2.0 g/100 g of product |
| Sanitary cleaners | 1. g/100 g of product
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| 14. Are requirements for anaerobic biodegradability necessary for this product group? Which other parameters could be considered? | [ ]  Yes [ ]  No | If no, please explain why and/or propose modification. |
| 1. Are the current limits set for anaerobic biodegradability of surfactants strict enough?
 | [ ]  Yes [ ]  No | If no, please explain why and/or propose modification. |
| 1. Are the current limits effective in distinguishing between the state-of-the-art and the best performing products in the APC product group?
 | [ ]  Yes [ ]  No | If no, please explain why and/or propose modification. |

##### Criterion 3: Excluded or limited substances and mixtures

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| Under the existing criteria, the following ingredients must not be included in the product: |
| **Substance** |
| APEO (alkyl phenol ethoxylates) and ADP (alkylphenols and derivatives thereof) |
| EDTA (ethylenediamine tetraacetate) |
| 5-bromo-5-nitro-1,3-dioxane |
| 2-bromo-2-nitropropane-1,3-diol |
| Diazolinidylurea |
| Formaldehyde |
| Sodium hydroxyl methyl glycinate |
| Nitromusks and polycyclic musks |

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| There are restrictions on the use of quaternary ammonium salts: |
| **Substance** |
| Quaternary ammonium salts that are not readily biodegradable shall not be used, either as part of the formulation or as part of any mixture included in the formulation. |
| There are restrictions on the use of biocides |
| **Substance** |
| 1. The product may only include biocides in order to preserve the product, and in the appropriate dosage for this purpose alone. This does not refer to surfactants, which may also have biocidal properties.
2. It is prohibited to claim or suggest on the packaging or by any other communication that the product has an antimicrobial action.
3. Biocides, either as part of the formulation or as part of any mixture included in the formulation, that are used to preserve the product and that are classified H410/R50-53 or H411/R51-53 in accordance with Directive 67/548/EEC, Directive 1999/45/EC of the European Parliament and of the Council ( 1 ) or Regulation (EC) No 1272/2008, are permitted but only if their bioaccumulation potentials are characterised by log Pow (log octanol/water partition coefficient) < 3,0 or an experimentally determined bioconcentration factor (BCF) ≤ 100.
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| In addition, the most critical substances regarding human health and environment must also not be included in the product. This is a standard requirement for ecolabelled washing and cleaning products. However, there are certain substances which are specifically exempted from this requirement: |
| **Substance** | **Hazard statement** | **Risk phrase** |
| Surfactants (in concentrations <25% in the product) | H400 and H412 | R50 and R52-53 |
| Fragrances | H412 | R52-53 |
| Enzymes | H334 and H317 | R42 and R43 |
| NTA as in impurity in MGDA and GLDA | H351 | R40 |
| The criteria also impose restrictions on the use of biocides and on substances listed in accordance with Article 59(1) of Regulation EC No 1907/2006. |

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| 1. Are there any additional ingredients which should be specifically excluded or limited from EU Ecolabelled APCs?
 | [ ]  Yes [ ]  No | If yes, please specify and provide rationale or supporting information. |
| 1. Are any additional derogations required?
 | [ ]  Yes [ ]  No | If yes, please explain why and/or propose modification and provide rationale or supporting information. |
| 1. Are there any substances or mixtures which no longer need to be excluded?
 | [ ]  Yes [ ]  No | If yes, please explain why and/or propose modification and provide rationale or supporting information. |
| 1. Should nanomaterials be excluded from EU Ecolabelled APC products?
 | [ ]  Yes [ ]  No | If yes, please specify and provide rationale or supporting information. |
| 1. Are further requirements needed for the use of biocides in the product?
 | [ ]  Yes [ ]  No | If yes, please explain why and/or propose modification and provide rationale or supporting information. |

##### Criterion 4: Fragrances

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| Under the current criteria the following requirements on fragrances apply: |
| 1. Nitro- and polycyclic musk-based fragrances are prohibited as in Criterion 3.
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| 1. Any substance added to the product as a fragrance must have been manufactured and/or handled in accordance with the code of practice of the International Fragrance Association. The code can be found on IFRA’s website: http://www.ifraorg.org
 |
| 1. Other fragrances may be limited to < 100 ppm (w/w) by the requirements of Regulation (EC) No 648/200 (Annex VII) or where they are classified H317/R43 may cause allergic skin reaction and/or H334/R32 may cause allergy or asthma symptoms or breathing difficulties if inhaled.
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| 1. Are there any additional fragrance ingredients which should be specifically excluded or limited from EU Ecolabel APCs?
 | [ ]  Yes [ ]  No | If yes, please specify and provide rationale or supporting information. |
| 1. Are there any further requirements needed for fragrances?
 | [ ]  Yes [ ]  No | If yes, please specify and provide rationale or supporting information. |
| 1. Should the use of fragrances be allowed in professional products?
 | [ ]  Yes [ ]  No | If yes, please specify and provide rationale or supporting information. |

##### Criterion 5: Volatile organic compounds (VOCs)

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| VOCs are compounds having a boiling point lower than 150 °C. The current criteria limit the VOCs permissible in the product as concentrate or in diluted form, and are currently set at the following levels: |
| **Product type** | **Total VOC** |
| All-purpose cleaners diluted prior to use | < 0.2 % (w/w) in the washing water |
| All-purpose cleaners used without dilution | < 6 % (w/w) in the product |
| Window cleaners | < 10 % (w/w) in the product |
| Sanitary cleaners | < 6 % (w/w) in the product |

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| 1. Are the limits on VOCs in the product strict enough?
 | [ ]  Yes [ ]  No | If no, please explain why and/or propose modification. |

##### Criterion 6: Phosphorus

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| The total quantity of elemental phosphorus in the product shall be calculated on the basis of the dosage of the product recommended by the manufacturer taking into account all substances containing phosphorus (e.g. phosphates and phosphonates). Under the current criteria, the limits on phosphorus are: |
| **Product type** | **Total phosphorus content** |
| All-purpose cleaners diluted prior to use | < 0.02 g (P)/1 L of washing water |
| All-purpose cleaners used without dilution | < 0.2 g (P)/100 g of product |
| Window cleaners | None permissible |
| Sanitary cleaners | < 1.0 g (P)/100 g of product |

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| 1. Are the current limits set for the maximum amounts of phosphorus strict enough for APCs available on the market?
 | [ ]  Yes [ ]  No | If no, please explain why and/or propose modification. |
| 1. Are the current limits effective in distinguishing between the state-of-the-art and the best environmental performing products in the APC product group?
 | [ ]  Yes [ ]  No | If no, please explain why and/or propose modification. |
| 1. Should phosphorus compounds such as phosphates and phosphonates be banned from this product group?
 | [ ]  Yes [ ]  No | If yes, please explain why and/or propose modification. |

##### Criterion 7: Packaging requirements

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| The existing criteria specify the following requirements on packaging: |
| 1. Sprays containing propellants must not be used
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| 1. Plastics that are used for the main container must be marked in accordance with EC Directive 94/62/EC or DIN 6120 part 1 and 2 in connection with DIN 7728 part 1
 |
| 1. If the primary packaging is made of recycled material, any indication of this on the packaging shall be in conformity with the ISO 14021 standard
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| 1. Products packaged in trigger sprays must be sold as part of a refillable system
 |
| 1. Only phthalates that at the time of application have been risk assessed and have not been classified according to Criterion 3c may be used in the plastic packaging
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| 1. The weight utility ratio (for primary packaging) must not exceed the following values:
 |
| **Product type** | **WUR** |
| Concentrated products, including liquid concentrates and solids that are diluted in water prior to use. | 1.2 g/ l use solution (washing water) |
| Ready-to-use products, i.e. products used without further dilution. | 1. g/ l use solution (washing water)
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| 1. Do you think that is it necessary to have a criterion on packaging requirements for this product group?
 | [ ]  Yes [ ]  No | If no, please explain why and/or propose modification. |
| 1. Are the WUR limits acceptable for APCs currently on the market?
 | [ ]  Yes [ ]  No | If no, please explain why and/or propose modification. |
| 1. Should additional criteria be set to further promote the use of recycled materials in packaging?
 | [ ]  Yes [ ]  No | If yes, please explain why and/or propose modification. |
| 1. Should there be restrictions on combinations of materials used for packaging? For instance to design for recycling (like the new proposed criterion for rinse-off cosmetics).
 | [ ]  Yes [ ]  No | If yes, please explain why and/or propose modification. |

##### Criterion 8: Washing performance (fitness for use)

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| The existing criteria state that the product shall be fit for use, meeting the needs of the consumer:1. All-purpose cleaners and window cleaners

For all-purpose cleaners, only fat-removing effects must be documented. For window cleaners, stripe-less drying must be documented.The cleaning ability must be equivalent to, or better than, that of a market-leading or generic reference product, approved by a Competent Body. Frameworks for testing the performance of all-purpose cleaners, window cleaners and sanitary cleaners can be found here: <http://ec.europa.eu/environment/ecolabel/documents/performance_test_cleaners.pdf>1. Sanitary cleaners include bathroom cleaners, toilet cleaners and kitchen cleaners. For bathroom cleaners, both limesoap and limescale removal shall be documented. For acidic toilet cleaners, only limescale removal shall be documented. For kitchen cleaners, fat removing effects shall be documented.

The cleaning ability must be equivalent to or better than that of the generic reference detergent specified in the framework for testing performance given in the above link. The generic reference detergent shall be the one prescribed in IKW performance test ‘Recommendation for the quality assessment of acidic toilet cleaners’ (SÖFW-journal, 136, 11, pp50-56, 200). The reference detergent is applicable for toilet cleaners and bathroom cleaners; however, the pH must be reduced to 3.5 for testing bathroom cleaners.  |

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| 1. **Please provide your comments on the washing performance test and, if appropriate, proposals for modification**

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##### Criterion 9: User instructions

**Information on the packaging**

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| **Dosage instructions:**Information on the recommended dosage of all-purpose cleaners and sanitary cleaners shall appear on the packaging in a reasonably sufficient size and against a visible background. In the case of a concentrated product, it shall be clearly indicated on the packaging that only a small quantity of the product is needed compared to normal (i.e. diluted) products.The following (or equivalent) text shall appear on the packaging:‘Proper dosage saves costs and minimises environmental impacts’The following (or equivalent) text shall appear on the packaging of ready-to-use all-purpose cleaners:‘The product is not intended for large scale cleaning’ |
| **Safety advice:**The following safety advice (or equivalent) shall appear on the product in text or as pictograms:* Keep away from children
* Do not mix different cleaners
* Avoid inhaling sprayed product (only for products that are packaged as sprays)
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| 1. Are additional requirements and instructions for dosage needed?
 | [ ]  Yes [ ]  No | If yes, please explain why and/or propose modification. |
| 1. Are additional requirements needed for dosing of products intended for professional users?
 | [ ]  Yes [ ]  No | If yes, please explain why and/or propose modification. |
| 1. Are the requirements for safety advice on the packaging sufficient?
 | [ ]  Yes [ ]  No | If no, please explain why you think so. |

##### Criterion 10: Information appearing on the EU Ecolabel

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| An optional label with text box shall contain the following text:* Reduced impact on aquatic life
* Reduced use of hazardous substances
* Reduced packaging waste
* Clear user instructions
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| 1. Is there any other information which should be included on the EU Ecolabel claims text?
 | [ ]  Yes [ ]  No | If yes, please specify. |

##### Criterion 11: Professional training

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| Under the current criteria for detergents which are used by professional users, the producer, 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. |

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| 1. Are any further requirements for professional training needed?
 | [ ]  Yes [ ]  No | If yes, please specify. |

## 2.4 Further issues or hotspots for APCs

The current criteria are set for 11 different aspects of APCs, with the aim of promoting products which have a reduced impact on aquatic ecosystems, contain a limited amount of hazardous substances and whose performance has been tested.

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| 1. **Should further criterion be developed, either because all the issues are not already covered or because of recent developments which affect the environmental performance of APCs?**

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| 1. **Do you consider it feasible to link the CDV or aquatic toxicity criterion and performance criteria? If yes, please explain your approach.**

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| 1. **Do you know of any examples of the use of nanomaterials in APCs? Should their use be banned from this product group and why?**

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## 2.6 Market data

The market analysis forms an integral part of the criteria revision process, as it identifies important drivers, trends and innovations in the market for APCs.

If you have any information on market data (volumes and units) statistics for any sub-product within the APC product group (e.g. floor cleaners, sanitary cleaners and windows cleaners) used for private and industrial/institutional purposes, please mention it here so that we can get in touch with you and collect the details needed for the project. Thank you in advance for your cooperation.



## 2.7 Commission Statement

Please find below the Commission statement accompanying the criteria revision to see the issues which should particularly be taken into account.

# Appendix 1: Commission statements for criteria revision

