



Revision of EU Ecolabel Criteria for detergent product groups

**Laundry detergents – domestic and industrial & institutional,
Dishwasher detergents – domestic and industrial & institutional,
Hand dishwashing detergents and
All-purpose cleaners and sanitary cleaners**

*2nd Ad-hoc Working Group Meeting
October 2015, Brussels*

**Joint Research Centre
The European Commission's in-house science service**

Content

Day 1: Tuesday, 20th October 2015

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	Coffee break	11:15 – 11:45
3.	Definitions, Measurement thresholds Reference dosage, Dosage requirements	11:45 – 13:00
	Lunch break	13:00 – 14:00
4.	Toxicity to aquatic organisms criteria	14:00 -16:00
	Coffee break	16:00 – 16:30
5.	Biodegradability criteria	16:30 – 18:00

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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, Micro-organisms, etc. - Other 	09:30 – 11:30
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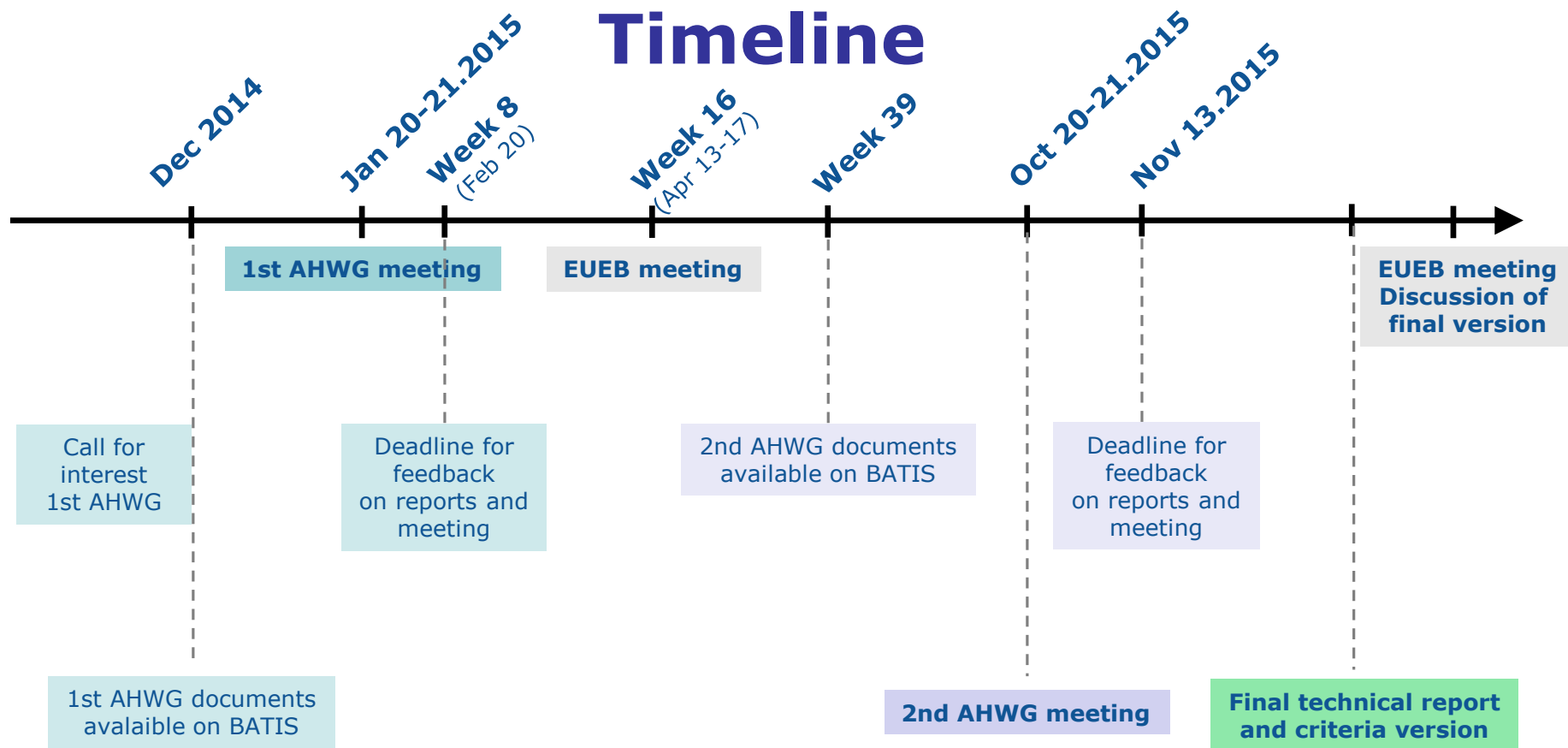
Current EU Ecolabels

The "detergents and cleaning products" group is made up of:

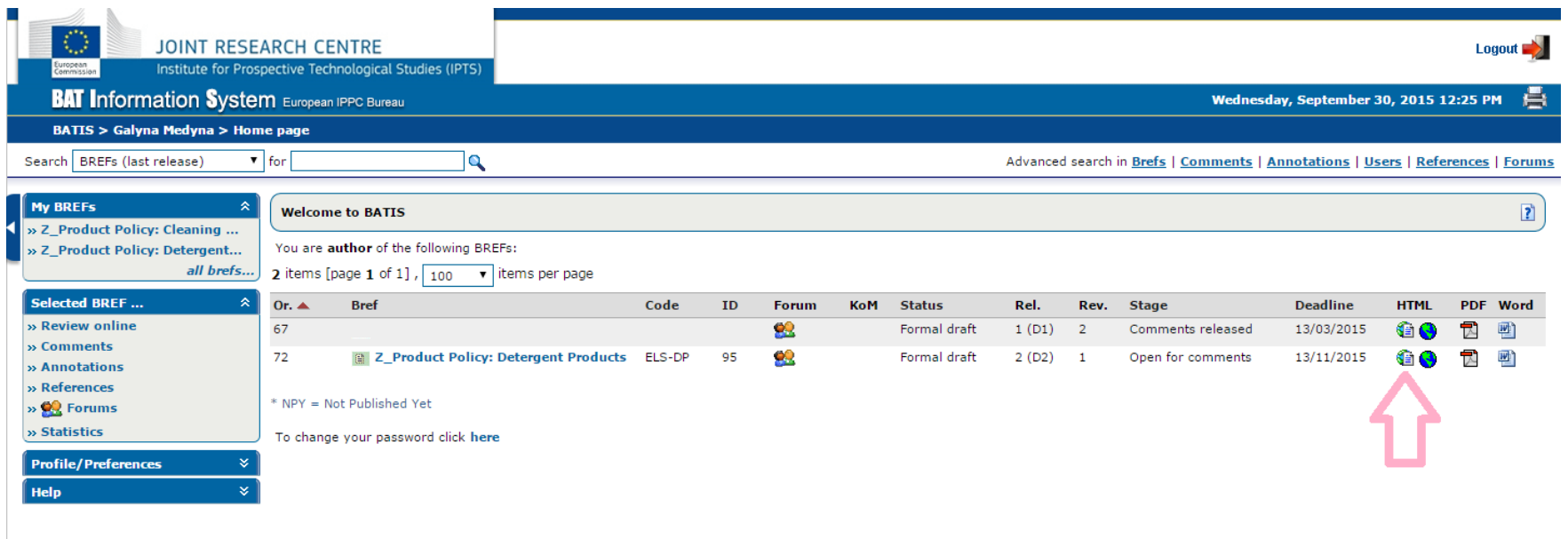
Product group name	Recent decision number and publishing date
Domestic laundry detergents Est. 1999 Rev. 2003	Commission Decision 2011/264/EU of 28 April 2011
Industrial and institutional laundry detergents Est. 2012	Commission Decision 2012/721/EU of 14 November 2012
Detergents for dishwashers Est. 1999 Rev. 2003	Commission Decision 2011/263/EU of 28 April 2011
Industrial and institutional automatic dishwasher detergents Est. 2012	Commission Decision 2012/720/EU of 14 November 2012
All-purpose cleaners and sanitary cleaners Est. 2005	Commission Decision 2011/383/EU of 28 June 2011
Hand dishwashing detergents Est. 2005	Commission Decision 2011/382/EU of 24 June 2011




Timeline




Comments on technical report



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Or. ▲	Bref	Code	ID	Forum	KoM	Status	Rel.	Rev.	Stage	Deadline	HTML	PDF	Word
67						Formal draft	1 (D1)	2	Comments released	13/03/2015			
72	 Z_Product Policy: Detergent Products	ELS-DP	95			Formal draft	2 (D2)	1	Open for comments	13/11/2015			

* NPY = Not Published Yet

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All previously published reports (preliminary report, 1st draft Technical Reports, etc.)

→ <http://susproc.jrc.ec.europa.eu/detergents/stakeholders.html>

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Product group names

Current name	Proposed name
Laundry detergents	Laundry detergents
Industrial and institutional laundry detergents	Industrial and institutional laundry detergents
Detergents for dishwashers	Dishwasher detergents
Industrial and institutional automatic dishwasher detergents	Industrial and institutional automatic dishwasher detergents
Hand dishwashing detergents	Hand dishwashing detergents
All-purpose cleaners and sanitary cleaners	Hard-surface cleaning products



Product group names

→ LD/DD – products for household applications that can also be used in machines similar to those found in households, can "consumer products" be misunderstood?

→ IILD/IIDD – "I&I" or "professional"?



Laundry detergents

The product group 'laundry detergents' shall comprise any laundry detergent and pre-treatment stain remover falling under the scope of Regulation (EC) No 648/2004 of the European Parliament and of the Council on detergents which are marketed and used for the washing of textiles principally in household machines, but not excluding their use in laundrettes and common laundries.

Pre-treatment stain removers include stain removers used for direct spot treatment of textiles (before washing in the machine) but do not include stain removers dosed in the washing machine and stain removers dedicated to other uses besides pre-treatment.

This product group shall not comprise products that are dosed by carriers such as sheets, cloths or other materials nor washing auxiliaries used without subsequent washing such as stain removers for carpets and furniture upholstery.



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Industrial and institutional laundry detergents

The product group 'industrial and institutional laundry detergents' shall comprise any laundry detergent falling under the scope of Regulation (EC) No 648/2004 of the European Parliament and of the Council on detergents designed to be used by specialised personnel in industrial and institutional facilities.

Included in this product group are multi-component systems constituted of more than one component used to build up a complete detergent or a laundering program for an automatic dosing system. Multi-component systems may incorporate a number of products including fabric softeners, stain removers and rinsing agents.

This product group shall not comprise products which induce textile attributes such as water-repellency, waterproofness or fire retardancy, etc. Furthermore, the product group shall not comprise products that are dosed by carriers such as sheets, cloths or other materials, as well as washing auxiliaries used without subsequent washing, such as stain removers for carpets and furniture upholstery.

Laundry products to be used in household washing machines are excluded from the scope of this product group.



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Laundry products to be used in household washing machines are excluded from the scope of this product group.



Dishwasher detergents

The product group 'dishwasher detergents' shall comprise any detergent for dishwashers or rinse aid falling under the scope of Regulation (EC) No 648/2004 of the European Parliament and of the Council on detergents which are intended to be marketed and used exclusively in household dishwashers and in automatic dishwashers for professional use, the size and usage of which is similar to that of household dishwashers.



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Industrial and institutional automatic dishwasher detergents

The product group 'industrial and institutional automatic dishwasher detergents' shall comprise any dishwasher detergent, rinse or pre-soak falling under the scope of Regulation (EC) No 648/2004 of the European Parliament and of the Council on detergents designed to be used by specialised personnel in professional dishwashers.

Included in this product group are multi-component systems constituted of more than one component used to build up a complete detergent. Multi-component systems may incorporate a number of products including pre-soaks and rinsing agents.

This product group shall not comprise dishwasher detergents designed for household dishwashers, detergents intended to be used in washers of medical devices or in special machines for the food industry.

Sprays not dosed via automatic pumps are excluded from this product group.



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Hand dishwashing detergents

The product group 'hand dishwashing detergents' shall comprise any detergent intended to be used to wash by hand glassware, crockery and kitchen utensils including cutlery, pots, pans and ovenware, and falling under the scope of Regulation (EC) No 648/2004 of the European Parliament and of the Council on detergents.

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



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Hard Surface Cleaning Products

(All-purpose cleaners and sanitary cleaners)

The product group 'hard surface cleaning products' shall comprise all-purpose cleaners, window cleaners and sanitary cleaners falling under the scope of Regulation (EC) No 648/2004 of the European Parliament and of the Council on detergents.

- a) All-purpose cleaners comprising detergent products intended for routine cleaning of hard surfaces such as walls, floors and other fixed surfaces including those in kitchens.
- b) Window cleaners comprising specific detergents intended for the routine cleaning of windows, glass and other highly polished surfaces.
- c) 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.

The product group shall cover products for both private and professional use, intended for indoor use and sold either in ready-to-use (to be used without dilution in water) or undiluted form. Products shall be mixtures of chemical substances.

Routine cleaning refers to cleaning performed at least monthly to remove everyday grime, soil, dust, grease, scum, slime, limescale, food and sanitary residues.



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Discussion

- Do you agree with the proposed changes? Which other changes do you think are necessary?
- Are some products excluded from the scopes that should be included and vice versa?

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Definitions

as appearing in Article 2



Article 2

1. For the purpose of this Decision, the following definitions shall apply:

- (1) 'ingoining substances' means substances intentionally added, by-products and impurities from raw materials in the final product formulation (including water-soluble foil, if applicable).
- (2) 'heavy-duty detergents' means detergents used for ordinary washing of white textiles at any temperature.
- (3) 'colour-safe detergents' means detergents used for ordinary washing of coloured textiles at any temperature.
- (4) 'light-duty detergents' means detergents intended for delicate fabrics.
- (5) 'primary packaging' means:



Definitions

- (*) "**heavy-duty detergents**" means detergents used for ordinary washing of white textiles at any temperature; (applicable for LD)
- (*) "**colour-safe detergents**" means detergents used for ordinary washing of coloured textiles at any temperature; (applicable for LD)
- (*) "**light-duty detergents**" means detergents intended for delicate fabrics; (applicable for LD)
- (*) "**undiluted product**" means a product that is diluted in water prior to use; (applicable for APC)
- (*) "**ready-to-use (RTU) product**" means a product that should not be diluted in water before use; (applicable for APC)



Definitions

(*) "**primary packaging**" means

- for single doses in a wrapper that is intended to be removed before washing, the individual dose wrapping in direct contact with the content and the packaging conceived so as to constitute the smallest sales unit of distribution to the final user or consumer at the point of purchase, including label where applicable;

- for all other types of products, packaging conceived so as to constitute the smallest sales unit of distribution to the final user or consumer at the point of purchase in direct contact with the content, including label where applicable; (applicable for LD/DD)

(*) "**primary packaging**" means packaging conceived so as to constitute the smallest sales unit of distribution to the final user or consumer at the point of purchase in direct contact with the content, including label where applicable; (applicable for IILD/IIDD/HDD/APC)



Definitions

(*) "**microplastics**" means plastic micro beads used as a scrub/abrasive material in detergent and cleaning products.



Definitions

(*) "**ingoing substances**" means substances intentionally added, by-products and impurities from raw materials in the final product formulation (including water-soluble foil, if applicable).



Assessment and verification

A) Requirements

The specific assessment and verification requirements are indicated within each criterion.

(...)

The following information shall be provided to the competent body:

(i) The list of all ingoing substances indicating trade name, chemical name, CAS no., DID no., the ingoing quantity, the function and the form present in the final product formulation (including foil) at or above the following concentrations:

- preservatives, fragrances and colouring agents - regardless of concentration,
- other ingoing substances - 0,010% by weight;

For each ingoing substance listed, the safety data sheet in accordance with Regulation (EC) No 1907/2006 of the European Parliament and of the Council shall be provided.

(ii) If a supplier prefers not to disclose the ingoing substances included in a mixture to the applicant, the information can be sent directly to the Competent Body by the supplier;

(iii) In exceptional cases, if the ingoing substances included in a mixture are unknown, the applicant can supply the information requested in (i) for the mixture.



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Assessment and verification

B) Measurement thresholds

Compliance with the ecological criteria is required for all ingoing substances as specified in Table 1.

Table 1 Threshold levels applicable to ingoing substances by criterion for XYZ product group

Criterion name		surfactants	preservatives	colouring agents	fragrances	other
Toxicity to aquatic organisms		≥ 0,010	no limit*	no limit*	no limit*	≥ 0,010
Biodegradability	Surfactants	≥ 0,010	x	x	x	x
	Organics	≥ 0,010	no limit*	no limit*	no limit*	≥ 0,010
Sustainable sourcing of palm oil		≥ 0,010	x	x	x	x
Excluded or limited substances and mixtures	Specified excluded and limited subst.	no limit*	no limit*	no limit*	no limit*	no limit*
	Hazardous subst.	≥0,010	≥0,010	≥0,010	≥0,010	≥0,010
	SVHCs	no limit*	no limit*	no limit*	no limit*	no limit*
	Fragrances	x	x	x	no limit*	x
	Preserva-tives	x	no limit*	x	x	x
	Colourants	x	x	no limit*	x	x
	Enzymes	x	x	x	x	≥ 0,010

* "no limit" means: regardless of the concentration, all substances intentionally added, by-products and impurities from raw materials (analytical limit of detection)



Discussion

- Are the proposed definitions clearer?
- Is the proposed way of handling mixtures appropriate?
- Feedback on how the measurement thresholds are proposed to be presented is welcome!

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Functional unit and reference dosage

Summary of the current approaches

	LD	IILD	DD	IIDD	APC	HDD
Functional unit	g/kg wash (grams per kilo wash)	g/kg laundry (grams per kilo laundry)	Quantity of product required to wash 12 place settings with a standard soil	g/l washing solution (grams per litre washing solution)	(nothing explicit)	(nothing explicit)
Reference dosage	Quantity recommended by the manufacturer necessary for: - 4.5kg load (heavy duty detergent) - 2.5kg load (low duty detergent)	(nothing explicit)	Quantity necessary for normally soiled dishes and 12 place settings	(nothing explicit)	Quantity necessary for 1l of washing water (undiluted products) or 100g (ready-to-use products).	Quantity necessary for 1l of washing water for normally soiled dishes.



Laundry detergents

The following dosage is taken as the reference dosage for the calculations aiming at documenting compliance with the EU Ecolabel criteria and for testing of cleaning ability:

Table 2. Dosage recommended by the manufacturers for each laundry detergent type

Heavy-duty detergent, colour-safe detergent	Dosage recommended by the manufacturer for one kilogram of normally soiled dry laundry (indicated in g/kg laundry or ml/kg laundry) calculated on the basis of the dosage recommended for a load of 4,5kg at a water hardness of 2,5 mmol CaCO ₃ /l
Light-duty detergent	Dosage recommended by the manufacturer for one kilogram of normally soiled delicate laundry (indicated in g/kg laundry or ml/kg laundry) calculated on the basis of the dosage recommended for a load of 2,5kg at a water hardness of 2,5 mmol CaCO ₃ /l
Stain remover (pre-treatment only)	Dosage recommended by the manufacturer for one kilogram of dry laundry (indicated in g/kg laundry or ml/kg laundry) calculated on the basis of 6 applications for a load of 4,5kg.

If the recommended dosage is stated for other wash load sizes than the above, the reference dosage used for calculation of the ecological criteria must, however, correspond to the average load size. If the water hardness of 2,5 mmol CaCO₃/l is not relevant in the Member States in which the detergent is marketed, the applicant shall specify the dosage used as the reference.



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<u>Stain remover (pre-treatment only)</u>	<u>Dosage recommended by the manufacturer for one kilogram of dry laundry (indicated in g/kg laundry or ml/kg laundry) calculated on the basis of 6 applications for a load of 4,5kg.</u>

If the recommended dosage is stated for other wash load sizes than the above, the reference dosage used for calculation of the ecological criteria must, however, correspond to the average load size. If the water hardness of 2,5 mmol CaCO₃/l is not relevant in the Member States in which the detergent is marketed, the applicant shall specify the dosage used as the reference.



Industrial and institutional laundry detergents

Previously in → Criterion 1 — Product and dosage information

Worst-case dosage recommended by the manufacturer to wash one kilogram of dry laundry (indicated in g/kg laundry or ml/kg laundry). The worst-case scenario is considered to be the worst soiling acceptable for clothes (see classification in table below) and the maximum water hardness found at the location where the product is marketed. All products in a multi-component system must be included with the worst case dosage when assessments of the criteria are made.

Examples of degree of soiling:

Light	Medium	Heavy
Hotel: bed-linen, bedclothes and towels, etc. (towels may be considered heavily soiled) Cloth hand towel rolls	Work clothes: institutions/retail/service, etc. Restaurants: table-cloths, napkins, etc. Mops and mats	Work clothes: industry/kitchen/butchering, etc. Kitchen textiles: clothes, dish towels, etc. Institutions as hospitals: bed-linen, bedclothes, contour sheets, patient clothing, doctor's coat or coatdress, etc.



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Previously in → Criterion 1 — Product and dosage information

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Dishwasher detergents

The following dosage is taken as the reference dosage for the calculations aiming at documenting compliance with the EU Ecolabel criteria and for testing of cleaning ability:

Dishwasher detergent	Dosage recommended by the manufacturer to wash 12 normally soiled place settings under standard conditions ("wash"), as laid down in the IKW washing performance test referred to in Criterion 6 (indicated in g/wash or ml/wash).
Rinse aid	3 ml



Dishwasher detergents

The following dosage is taken as the reference dosage for the calculations aiming at documenting compliance with the EU Ecolabel criteria and for testing of cleaning ability:

Dishwasher detergent	Dosage recommended by the manufacturer to wash 12 normally soiled place settings under standard conditions ("wash"), as laid down in the IKW washing performance test referred to in Criterion 6 (indicated in g/wash or ml/wash).
<u>Rinse aid</u>	<u>3 ml</u>



Industrial and institutional automatic dishwasherdetergents

Highest dosage recommended by the manufacturer to produce one litre of washing solution based on water hardness (indicated in g/l washing solution or ml/l washing solution).

Hand dishwashing detergents

Dosage recommended by the manufacturer for one litre of washing water for cleaning normally soiled dishes (indicated in g/l washing water or ml/l washing water).



Hard-surface cleaning products

The following dosages are taken as the reference dosage for the calculations aiming at documenting compliance with the EU Ecolabel criteria and for testing of cleaning ability:

Ready-to-use products (RTU)	1 litre of RTU product
Undiluted products	Dosage recommended by the manufacturer for preparing 1 litre of cleaning solution for cleaning normally soiled surfaces (indicated in g/l cleaning solution or ml/l cleaning solution).



Hard-surface cleaning products

The following dosages are taken as the reference dosage for the calculations aiming at documenting compliance with the EU Ecolabel criteria and for testing of cleaning ability:

Ready-to-use (RTU) products	<u>1 litre of RTU product</u>
Undiluted products	Dosage recommended by the manufacturer for preparing 1 litre of cleaning solution for cleaning normally soiled surfaces (indicated in g/l cleaning solution or ml/l cleaning solution).



Discussion

- Do you agree with the proposed reference dosages?



Dosage requirements

Summary of current approaches

Criterion	LD	IILD	DD	IIDD	APC	HDD
1	Dosage requirement	Dosage information	Total chemicals	CDV	CDV	CDV
2	CDV	CDV	Restricted substances	Biodegradability	Biodegradability	Biodegradability
3	Biodegradability	Biodegradability	CDV	Restricted substances	Restricted substances	Restricted substances
4	Restricted substances	Restricted substances	Biodegradability	Packaging	Fragrances	Fragrances
5	Packaging	Packaging	Washing performance	Washing performance	VOC	Corrosive properties
6	Washing performance	Washing performance	Packaging	Automatic dosing system	Phosphorus	Packaging
7	Points	Automatic dosing system	Consumer information	Consumer information/information on EU Ecolabel	Packaging	Washing performance
8	Consumer information	Consumer information/information on EU Ecolabel	Information on EU Ecolabel		Washing performance	Consumer information
9	Information on EU Ecolabel				Consumer information	Information on EU Ecolabel
10					Information on EU Ecolabel	
11					Professional training	



Dosage requirements

Proposed changes

Criterion	LD	IILD	DD	IIDD	APC	HDD
1	Dosage requirement	CDV	Dosage requirement	CDV	CDV	CDV
2	CDV	Biodegradability	CDV	Biodegradability	Biodegradability	Biodegradability
3	Biodegradability	Sustainable sourcing of palm oil, etc.	Biodegradability	Sustainable sourcing of palm oil, etc.	Sustainable sourcing of palm oil, etc.	Sustainable sourcing of palm oil, etc.
	Sustainable sourcing of palm oil, etc.	Restricted substances	Sustainable sourcing of palm oil, etc.	Restricted substances	Restricted substances	Restricted substances
4	Restricted substances	Packaging	Restricted substances	Packaging	Packaging	Corrosive properties
5	Packaging	Fitness for use	Packaging	Fitness for use	Fitness for use	Packaging
6	Fitness for use	Automatic dosing systems	Fitness for use	Automatic dosing systems	User information	Fitness for use
7	User information	User information	User information	User information	Information on EU Ecolabel	User information
8	Information on EU Ecolabel	Information on EU Ecolabel	Information on EU Ecolabel	Information on EU Ecolabel		Information on EU Ecolabel



Dosage requirements Proposed changes

Criterion	LD	IILD	DD	IIDD	APC	HDD
1	Dosage requirement	CDV	Dosage requirement	CDV	CDV	CDV
2	CDV	Biodegradability	CDV	Biodegradability	Biodegradability	Biodegradability

Specialised personnel and obligatory automatic dosing systems for multi-component products



Dosage requirements

Proposed changes

Criterion	LD	IILD	DD	IIDD	APC	HDD
1	Dosage requirement	CDV	Dosage requirement	CDV	CDV	CDV
2	CDV	Biodegradability	CDV	Biodegradability	Biodegradability	Biodegradability

The scope covers a large number of product types, corresponding to a large number of applications.



Dosage requirements

Proposed changes

Criterion	LD	IILD	DD	IIDD	APC	HDD
1	Dosage requirement	CDV	Dosage requirement	CDV	CDV	CDV
2	CDV	Biodegradability	CDV	Biodegradability	Biodegradability	Biodegradability

One type of product but great variety in ways people use it and in what can be washed



Laundry detergents

The reference dosage shall not exceed the following amounts:

Table 3. Maximum reference dosage for each type of laundry product

Product type	Dosage
Heavy-duty detergent, colour-safe detergent	16 g/kg laundry
Light-duty detergent	10 g/kg laundry
Stain remover (pre-treatment only)	2,7 g/kg laundry

Assessment and verification: the applicant shall provide the product label that includes the dosing instructions and documentation showing the density (g/ml) of liquid products.



Laundry detergents

The reference dosage shall not exceed the following amounts:
 Table 3. Maximum reference dosage for each type of laundry product

For both
 powders and
 liquids

Product type	Dosage
Heavy-duty detergent, colour-safe detergent	<u>16 g/kg laundry</u>
Light-duty detergent	10 g/kg laundry
Stain remover (pre-treatment only)	2,7 g/kg laundry

Assessment and verification: the applicant shall provide the product label that includes the dosing instructions and documentation showing the density (g/ml) of liquid products.



Dishwasher detergents

The reference dosage shall not exceed the following amounts:

Product type	Dosage
Single-function dishwasher detergent	19,0 g/wash
Multi-function dishwasher detergent	21,0 g/wash

Rinse aids are exempted from this requirement.

Assessment and verification: the applicant shall provide the product label that includes the dosing instructions and documentation showing the density (g/ml) of liquid products.



Dishwasher detergents

The reference dosage shall not exceed the following amounts:

For both
powders and
liquids

Product type	Dosage
Single-function dishwasher detergent	<u>19,0 g/wash</u>
Multi-function dishwasher detergent	<u>21,0 g/wash</u>

Rinse aids are exempted from this requirement.

Assessment and verification: the applicant shall provide the product label that includes the dosing instructions and documentation showing the density (g/ml) of liquid products.



Automatic dosing systems

I&I laundry detergents, I&I dishwasher detergents

For multi-component systems, the applicant shall ensure that the product is used with an automatic and controlled dosing system.

In order to ensure correct dosage in the automatic dosing systems, customer visits shall be performed at all premises using the product, at least once a year during the license period, and they shall include calibration of the dosing equipment. A third party can perform these customer visits.

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



Automatic dosing systems

I&I laundry detergents, I&I dishwasher detergents

For multi-component systems, the applicant shall ensure that the product is used with an automatic and controlled dosing system.

In order to ensure correct dosage in the automatic dosing systems, customer visits shall be performed at all premises using the product, at least once a year during the license period, and they shall include calibration of the dosing equipment. A third party can perform these customer visits.

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



Discussion

- Do you agree with the proposed changes?

Content

Day 1: Tuesday, 20th October 2015

		SCHEDULE
1.	Introduction	09:30 – 10:00
2.	Detergent product groups names, scope and definitions	10:00 – 11:15
	Coffee break	11:15 – 11:45
3.	Definitions, Measurement thresholds Reference dosage, Dosage requirements	11:45 – 13:00
	Lunch break	13:00 – 14:00
4.	Toxicity to aquatic organisms criteria	14:00 – 16:00
	Coffee break	16:00 – 16:30
5.	Biodegradability criteria	16:30 – 18:00

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Toxicity to aquatic organisms

Assessment method

- CDV was developed to be specifically used in ecolabelling.
- It is not an LCA-based approach and only considers the toxicity of the ingoing ingredients at the time of manufacturing of a product.
- It makes heavy use of the precautionary principle and aims to protect the most sensitive species through the use of safety factors and worst-case scenario numbers.
- It is supported by the DID list (updated in 2014, lists information for over 200 ingredients commonly found in detergents and cosmetics).
- The CDV approach also encourages further research on the long-term effects of substances as the DID list is revised if new chronic data becomes available.



Toxicity to aquatic organisms changes in 2014 DID list

→ Main changes:

- 40 extra entries
- 30 substances with new or updated chronic data
- New degradation factor

→ Consequences for CDV values of detergents:

- Generally lower CDV values
- Hard-surface cleaning products are the main exception, there isn't one set trend
- Limited number of entries have the most impact (e.g. 2123, 2202, 2401, 2411, 2583)

Common text template – TOXICITY TO AQUATIC ORGANISMS

The critical dilution volume (CDV) of the product must not exceed the following limits for the reference dosage:

Table 26. Limit value of CDV per product type

Product type	Limit CDV

Assessment and verification:

The applicant shall provide the calculation of the CDV of the product. A spreadsheet for calculating of the CDV value is available on the EU Ecolabel website.

The CDV is calculated for all ingoing substances (*i*) in the product using the following equation:

$$CDV = \sum CDV(i) = 1000 \cdot \sum dosage(i) \cdot \frac{DF(i)}{TF(i)}$$

Where:

dosage(i): weight (g) of the substance or mixture *i* in the reference dose,

DF(i): degradation factor for the substance or mixture *i*

TF(i): toxicity factor for the substance or mixture *i*

The values of *DF(i)* and *TF(i)* shall be as given in the DID list Part A (Appendix I). If an ingoing substance is not included in the DID list Part A, the applicant shall estimate the values following the approach described in the DID list Part B (Appendix I).

(only applicable to I&I products)

Because of the degradation of certain substances in the wash process, separate rules apply to the following:

- hydrogen peroxide (H₂O₂) – not to be included in calculation of CDV
- peracetic acid – to be included in the calculation as acetic acid.



Laundry detergents

Product type	Proposed limit CDV
Heavy-duty detergent, colour-safe detergent	31 500 l/kg laundry
Light-duty detergent	20 000 l/kg laundry
Stain remover (pre-treatment only)	3 500 l/kg laundry



Laundry detergents

Product type	Proposed limit CDV
Heavy-duty detergent, colour-safe detergent	<u>31 500 l/kg laundry</u>
Light-duty detergent	20 000 l/kg laundry
Stain remover (pre-treatment only)	3 500 l/kg laundry

→ Influence of change to 2014 DID list: values decreased by 10-50% but few data points and only for heavy-duty detergents.

Industrial and institutional laundry detergents

Soft water (<1,5 mmol CaCO₃/L)

Degree of soiling	Light	Medium	Heavy
Product type			
Powder	30 000	40 000	50 000
Liquid	50 000	60 000	70 000
Multi-component-system	50 000	70 000	90 000

Medium water (1,5 – 2,5 mmolCaCO₃/L)

Degree of soiling	Light	Medium	Heavy
Product type			
Powder	40 000	60 000	80 000
Liquid	60 000	75 000	90 000
Multi-component-system	60 000	80 000	100 000

Hard water (> 2,5 mmol CaCO₃/L)

Degree of soiling	Light	Medium	Heavy
Product type			
Powder	50 000	75 000	90 000
Liquid	75 000	90 000	120 000
Multi-component-system	75 000	100 000	120 000

Industrial and institutional laundry detergents

Soft water (<1,5 mmol CaCO₃/L)

Degree of soiling	Light	Medium	Heavy
Product type			
Powder	30 000	40 000	50 000
Liquid	50 000	60 000	70 000
Multi-component-system	50 000	70 000	90 000

Medium water (1,5 – 2,5 mmolCaCO₃/L)

Degree of soiling	Light	Medium	Heavy
Product type			
Powder	40 000	60 000	80 000
Liquid	60 000	75 000	90 000
Multi-component-system	60 000	80 000	100 000

Hard water (> 2,5 mmol CaCO₃/L)

Degree of soiling	Light	Medium	Heavy
Product type			
Powder	50 000	75 000	90 000
Liquid	75 000	90 000	120 000
Multi-component-system	75 000	100 000	120 000

→ Influence of change to 2014 DID list: no data.

Dishwasher detergents

Product type	Limit CDV
Single-function dishwasher detergents	20 000 l/wash
Multi-function dishwasher detergents	24 000 l/wash
Rinse aid	7 500 l/wash

Dishwasher detergents

Product type	Limit CDV
Single-function dishwasher detergents	<u>20 000 l/wash</u>
Multi-function dishwasher detergents	<u>24 000 l/wash</u>
Rinse aid	<u>7 500 l/wash</u>

→ Influence of change to 2014 DID list: no data.



Industrial and institutional automatic dishwasher detergents

Water hardness	Soft ($<1,5$ mmol CaCO_3/l)	Medium ($1,5 - 2,5$ mmol CaCO_3/l)	Hard ($>2,5$ mmol CaCO_3/l)
Product type			
Pre-soaks	2 000	2 000	2 000
Dishwasher detergents	3 000	5 000	7 000
Multi-component systems	3 000	4 000	5 000
Rinse aids	3 000	3 000	3 000

Industrial and institutional automatic dishwasher detergents

Water hardness	Soft ($<1,5$ mmol CaCO_3/l)	Medium ($1,5 - 2,5$ mmol CaCO_3/l)	Hard ($>2,5$ mmol CaCO_3/l)
Product type			
Pre-soaks	2 000	2 000	2 000
Dishwasher detergents	3 000	5 000	<u>7 000</u>
Multi-component systems	3 000	4 000	<u>5 000</u>
Rinse aids	3 000	3 000	3 000

→ Influence of change to 2014 DID list: no data.



Hand dishwashing detergents

Product type	Limit CDV
Hand dishwashing detergents	2 300



Hand dishwashing detergents

Product type	Limit CDV
Hand dishwashing detergents	<u>2 300</u>

→ Influence of change to 2014 DID list: values largely decreased (average decrease of 53% for 16 products), changes to one DID list entry causing most of the decrease.



Hard surface cleaning products

Product type	Limit CDV
All-purpose cleaners, RTU	300 000
All-purpose cleaners, undiluted	30 000
Window cleaners, RTU	48 000
Window cleaners, undiluted	4 800
Sanitary cleaners, RTU	700 000
Sanitary cleaners, undiluted	70 000

Hard surface cleaning products

Product type	Limit CDV
All-purpose cleaners, RTU	<u>300 000</u>
All-purpose cleaners, undiluted	<u>30 000</u>
Window cleaners, RTU	48 000
<u>Window cleaners, undiluted</u>	<u>4 800</u>
Sanitary cleaners, RTU	<u>700 000</u>
<u>Sanitary cleaners, undiluted</u>	<u>70 000</u>

→ Influence of change to 2014 DID list: no noticeable trend with some possible large increases and decreases in the values for some products.



Discussion

- More feedback on the influence of the change to the 2014 DID list always welcome!

Content

Day 1: Tuesday, 20th October 2015

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	Coffee break	16:00 – 16:30
5.	Biodegradability criteria	16:30– 18:00



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5.	Biodegradability criteria	16:30– 18:00



Comparison of the current biodegradability requirements

	Surfactants must be aNBO	Surfactants must be anNBO	Limits on aNBO of organics	Limits on anNBO of organics
LD			X separately for liquid and powder	X separately for liquid and powder
DD			X	X
IIDD	X	X	X separately for soft, medium and hard water	X separately for soft, medium and hard water
HDD	X	Surfactants that are not biodegradable under anaerobic conditions may be used in the product provided that the surfactants are not classified with H400/R50 (Very toxic to aquatic life) within the limit specified.		
APC	X	Surfactants not biodegradable under anaerobic conditions may be used in the product within specified limitations provided that they are not classified with H400/R50 (Very toxic to aquatic life)		



“Surfactants classified with H400 and H411 are derogated from the criterion on Excluded and limited substances and mixtures, section b, provided that they are both readily and anaerobically degradable. Surfactants classified with H412 are also derogated from the criterion on Excluded and limited substances and mixtures, section b”

DID list and anaerobically degradable surfactants

Information on anaerobic biodegradability of surfactants contained in the DID list 2014

Type of surfactant	Anaerobically biodegradable	Anaerobically non-biodegradable	Not tested	Number of positions listed
Anionic surfactants	10	7	15	32
Non-ionic surfactants	28	1	25	54
Amphoteric surfactants	4	-	3	7
Cationic surfactants	1	-	3	4
Summary	43	8	46	97



Common approach

(a) Biodegradability of surfactants

All surfactants shall be readily degradable (aerobically).

All surfactants classified as hazardous to aquatic environment shall be in addition anaerobically biodegradable.

(b) Biodegradability of organic compounds

The content of organic substances in the product that are aerobically non-biodegradable (not readily biodegradable aNBO) or anaerobically non-biodegradable (anNBO) shall not exceed the following limits for a reference dosage:

Product type	aNBO	anNBO,



Common approach – Cont.

Assessment and verification: the applicant shall provide documentation for the degradability of surfactants, as well as the calculation of aNBO and anNBO for the product. A spreadsheet for calculating aNBO and anNBO values is available on the EU Ecolabel website.

For both surfactants and aNBO and anNBO values, reference shall be done to the DID list.

For ingoing substances which are not included in the DID list, the relevant information from literature or other sources, or appropriate test results, showing that they are aerobically and anaerobically biodegradable shall be provided as described in the Appendix x, which is available on the EU Ecolabel website.

In the absence of documentation in accordance with the above requirements, an ingoing substance other than a surfactant may be exempted from the requirement for anaerobic degradability if one of the following three alternatives is fulfilled:

1. Readily degradable and has low adsorption ($A < 25\%$);
2. Readily degradable and has high desorption ($D > 75\%$);
3. Readily degradable and non-bioaccumulating.



Laundry detergents

aNBO (g/kg laundry)

Product type	aNBO, powder	aNBO, liquid
Heavy-duty laundry detergent, colour-safe detergent	1,0	0,55
Light-duty detergent	0,55	0,30
Stain remover (pre-treatment only)	0,10	0,10

anNBO (g/kg laundry)

Current value 0,7

Product type	anNBO, powder	anNBO, liquid
Heavy-duty laundry detergent, colour-safe detergent	1,3	0,6
Light-duty detergent	0,55	0,30
Stain remover (pre-treatment only)	0,10	0,10

Values provided for:

- 27 powder products (heavy-duty detergents)
- 41 liquid products (just 4 light-duty detergents)
- 2 stain removers



Industrial and institutional laundry detergents

aNBO (g/kg laundry)

Soft water (<1,5 mmol CaCO ₃ /L)			
Degree of soiling / Product type	Light	Medium	Heavy
Powder	0,70	1,10	1,40
Liquid	0,50	0,60	0,70
Multi-component-system	1,25	1,75	2,50

Medium water (1,5 – 2,5 mmolCaCO ₃ /L)			
Degree of soiling / Product type	Light	Medium	Heavy
Powder	1,10	1,40	1,75
Liquid	0,60	0,70	0,90
Multi-component-system	1,75	2,50	3,75

Hard water (> 2,5 mmol CaCO ₃ /L)			
Degree of soiling / Product type	Light	Medium	Heavy
Powder	1,40	1,75	2,20
Liquid	0,70	0,90	1,20
Multi-component-system	2,50	3,75	4,80



Industrial and institutional laundry detergents

anNBO (g/kg laundry)

Soft water (<1,5 mmol CaCO ₃ /L)			
Degree of soiling / Product type	Light	Medium	Heavy
Powder	0,70	1,10	1,40
Liquid	0,50	0,60	0,70
Multi-component-system	1,25	1,75	2,50

Medium water (1,5 – 2,5 mmolCaCO ₃ /L)			
Degree of soiling / Product type	Light	Medium	Heavy
Powder	1,10	1,40	1,75
Liquid	0,60	0,70	0,90
Multi-component-system	1,75	2,50	3,75

Hard water (> 2,5 mmol CaCO ₃ /L)			
Degree of soiling / Product type	Light	Medium	Heavy
Powder	1,40	1,75	2,20
Liquid	0,70	0,90	1,20
Multi-component-system	2,50	3,75	4,80



Dishwasher detergents

(g/wash)

Product type	aNBO	anNBO
Dishwasher detergents	1,0	3,0
Rinse aids	0,15	0,50

Current value
5,5

- Information available for 43 dishwasher products (mostly tablets)
- Very high variability of values provided
- 23 out of 43 values provided for laundry detergents for anNBO ranged between 1 and 2 g/wash, 10 ranged between 2 and 3 g/wash and just 1 exceeded 3 g/wash.



Industrial and institutional dishwasher detergents

anNBO (g/l washing solution)

Water hardness	Soft	Medium	Hard
Product type	<1,5 mmol CaCO ₃ /l	1,5 – 2,5 mmol CaCO ₃ /l	> 2,5 mmol CaCO ₃ /l
Pre-soaks	0,4	0,4	0,4
Dishwasher detergents/ Multi-component system	0,4	0,4	0,4
Rinse aids	0,04	0,04	0,04

anNBO (g/l washing solution)

Water hardness	Soft	Medium	Hard
Product type	<1,5 mmol CaCO ₃ /l	1,5 – 2,5 mmol CaCO ₃ /l	> 2,5 mmol CaCO ₃ /l
Pre-soaks	0,4	0,4	0,4
Dishwasher detergents/ Multi-component system	0,6	1,0 0.8	1,0
Rinse aids	0,04	0,04	0,04

Current value 1,5

➤ Information available for 13 dishwasher products and 7 rinse-aids only





Hand dishwashing detergents

(g/dosage recommended by the manufacturer for 1 litre of dishwashing water)

Product type	aNBO	anNBO
Hand dishwashing detergents	0,05	0,15

- Information available for 104 hand dishwashing detergents in accordance with the current criteria
- Only 17 products contained very small amounts of surfactants which are not anaerobic biodegradable in the concentration of max 0,13 g/l of dishwashing water
- Calculation for all organic compounds: Information for 15 products has been received. Based on the information provided the max content on aNBO and anNBO for hand dishwashing detergents amounted: 0.03 and 0.04 g/dosage recommended by the manufacturer for 1 litre of dishwashing water, respectively.



Hard surface cleaners

Available data on the existing products:

- out of 40 window cleaners only two contained anaerobically non-degradable surfactants in max amount of 1,6 g/100 g of product,
- out of 49 toilet cleaners only two contained anaerobically non-degradable surfactants in amount of max 1.5 g/100 g of product,
- out of more than 120 all-purpose cleaners 24 contained anaerobically non-degradable surfactants in max amount of 0,4 g/100 g of product,
- Out of 64 bathroom cleaners only 8 contained anaerobically non-degradable surfactants in amount of max 2 g/100 g of product,
- all 19 kitchen cleaners contained surfactants which are aerobically degradable.



Hard surface cleaners

RTU products (g/l of RTU product)
Undiluted products (g/l of in-use cleaning solution recommended for normally soiled surfaces)

Product type	aNBO	anNBO
All-purpose purpose cleaners (RTU)	6.0	?
Window cleaners (RTU)	1.0	?
Sanitary cleaners (RTU)	6.0	?
All-purpose cleaners (undiluted)	0.2	0.6
Window cleaners (undiluted)	-	-
Sanitary cleaners (undiluted)	-	-

High differences (21 prod.), max. 95, 3 products ~55

High differences (7 prod.), max. 35, 2 products ~15-20

High differences (12 prod.), 4 products ~25-35

36 products

Only 2 products



Discussion and consultation questions

- Do you agree with the proposed approach and requirements
- Need to double-check the proposed and work out missing values proposed for HDD and APC products



European
Commission

Thank you

Content

Day 2: Wednesday, 21st October 2015

		SCHEDULE
1.	Excluded and limited substances and mixtures criteria: - Specifically excluded substances and mixtures - H-statements based restriction - Specific limited in-going substances: Preservatives, Fragrances, Micro-organisms, etc. - Other	09:30 – 11:30
	Coffee break	11:30 – 12:00
2.	Packaging Sustainable sourcing of ingredients	12:00 – 13:30
	Lunch break	13:30 – 14:30
3.	Fitness for use criteria User instructions / Professional training User information	14:30 – 16:00
	Coffee break	16:00 – 16:30
4.	Any other non-horizontal criteria and remaining issues	16:30-17:30
5.	Summary and closure of the meeting	17:30 – 18:00

Excluded and restricted substances

The EU Ecolabel criteria can limit the inclusion of certain undesired substances using three approaches:

1. Specific exclusions for substances

- Atranol
- Microplastics
- Nanosilver
- ...

2. Exclusions and limitations based on classification with hazard classes

Acute toxicity
Category 1 and 2
H300 Fatal if swallowed
H310 Fatal in contact with skin
H330 Fatal if inhaled

3. Specific limitations by substance type/substance group (e.g. preservatives, fragrances).

(...) considered to be not bio-accumulating if $BCF < 100$ or $\log Kow < 3,0$.

Excluded and restricted substances

- Sub-criterion (a): Specified excluded and restricted ingoing substances and mixtures
- Sub-criterion (b): Hazardous substances
 - Derogations from the sub-criterion (b): Hazardous substances
- Sub-criterion (c): Substances of Very High Concern (SVHCs)
- Sub-criterion (d): Fragrances
- Sub-criterion (e): Preservatives
- Sub-criterion (f): Colouring agents
- Sub-criterion (g): Enzymes
- Sub-criterion (h): Microorganisms (only for Hard Surface Cleaners)

Sub-criterion (a)



1. Specific exclusions for substances

Sub-criterion (a) Specific excluded ingoing substances

(i) Excluded substances

Substances indicated in Table (a/b) shall not be included in the product formulation:

Table a. List of substances excluded from detergents and cleaning products regardless of concentration, excluding I&I Dishwasher Detergents

Table b. List of substances excluded from I&I Dishwasher Detergents regardless of concentration

(ii) Restricted substances

Substances listed below shall not be included in the product formulation above the specified mass concentration (...)

Sub-criterion (a)



Sub-criterion (a) Specific excluded ingoing substances

Harmonized **list of substances** that **shall not be included** in the following product groups

- **Laundry detergents**
- **Institutional and industrial laundry detergents**
- **Dishwasher detergents**
- **Hand dishwashing detergents**
- **Hard surface cleaners**

- APEO and ADP
 - Atranol
 - Chloroatranol
 - Diazolinidylurea
 - DTPA
 - EDTA
 - Formaldehyde
 - Hydroxyisohexyl 3-cyclohexene carboxaldehyde (HICC)
 - Microplastics
 - Nanosilver
 - Nitromusks and polycyclic musks
 - Phosphates
 - Per-fluorinated alkylates
 - Quaternary ammonium salts not readily biodegradable
 - Reactive chlorine compounds
 - Sodium hydroxyl methyl glycinate
 - Triclosan
 - 5-bromo-5-nitro-1,3-dioxane
 - 2-bromo-2-nitropropane-1,3-diol
- Only for Hard-Surface Cleaning Products:*
- Aromatic solvents
 - Halogenated solvents

Sub-criterion (a)



Sub-criterion (a) Specific excluded ingoing substances

List of substances that shall not be included in the industrial and institutional dishwasher detergents

- APEO and ADP
- Diazolinidylurea
- DTPA
- EDTA
- Formaldehyde
- Fragrances
- Microplastics
- Nanosilver
- Per-fluorinated alkylates
- Quaternary ammonium salts not readily biodegradable
- Reactive chlorine compounds
- Sodium hydroxyl methyl glycinate
- Triclosan
- 5-bromo-5-nitro-1,3-dioxane
- 2-bromo-2-nitropropane-1,3-diol

Sub-criterion (a)



Amyl cinnamal
alpha-Amylcinnamyl alcohol
Anise alcohol
Benzyl alcohol
Benzyl benzoate
Benzyl cinnamate
Benzyl salicylate
Butyl phenyl methyl propional
Cinnamal
Cinnamyl alcohol
Citral
Citronellol
Coumarin
Eugenol
Farnesol
Geraniol
Hexyl cinnamal
Hydroxycitronellal
Hydroxyisohexyl-3- cyclohexene
carboxyaldehyde
Isoeugenol
Alpha-isomethyl ionone
d-Limonene
Linalool
Methyl-2-octynoate
Evernia prunastri/oak moss
Evernia furfuracea/tree moss

1. Specific exclusions for substances

Sub-criterion (a) Specific excluded ingoing substances

(i) Excluded substances

(ii) Restricted substances

Substances listed below shall not be included in the product formulation above the specified mass concentration:

- [Different requirements depending on the product group]
- Fragrance substances subject to the declaration requirement provided in Detergents Regulation (EC) No 684/2004 shall not be present in quantities $\geq 0,010\%$ (≥ 100 ppm) per substance [with the exception of IIDD]



Substances listed below shall not be included above the following mass concentration:

- **Laundry detergents:**
 - 0.03Pg/kg of laundry

- **Institutional and industrial laundry detergent:**
 - 0.5Pg/kg laundry (dry weight) for light soil
 - 1.0Pg/kg laundry (dry weight) for light soil
 - 1.5Pg/kg laundry (dry weight) for light soil

- **Dishwasher detergents:**
 - 0.20Pg/wash for dishwasher
 - 0.30Pg/wash for rinsing agents

- **Industrial and institutional dishwasher detergents:**

Product type (in gP/l water)	Water hardness (mmol CaCO ₃ /l)		
	Soft (<1,5)	Medium (1,5-2,5)	Hard (>2,5)
Pre-soaks	0,08	0,08	0,08
Dishwasher detergents	0,15	0,30	0,50
Rinse aids	0,02	0,02	0,02
Multicomponent system	0,17	0,32	0,52



Substances listed below shall not be included above the following mass concentration

- **Hand dishwashing detergents:**

- not relevant

- **Hard surface cleaners:**

- **Industrial and institutional APC and sanitary cleaners: 0.5% in mass or 0.5g per 100g of product**
- **Other hard surface cleaners: phosphorus compounds shall not be intentionally added.**

Phosphorus compounds shall not be present in quantities $\geq 0.5\%$ in mass in industrial and institutional all-purpose cleaners and sanitary cleaners and shall not be intentionally added in household all-purpose cleaners, household sanitary cleaners and window cleaners

The calculation of the elemental phosphorus in the product shall be calculated on the basis of

- 1 litre of washing water and considering the dosage of the product recommended by the manufacturer for the cleaning of normally soiled surfaces (for products diluted in water prior to use) or
- per 100g of product (for products used without prior dilution) taking into account all substances containing phosphorus



Substances listed below shall not be included above the following mass concentration

Hard surface cleaners:

Volatile organic compounds (VOCs)* shall not be present in **quantities $\geq 1\%$ by weight in products as used** (e.g. after dilution, if applicable), unless otherwise specified in Table 74 for products with specific uses.

Volatile organic compounds **shall not be present in quantities $\geq 12\%$ by weight in products as sold** (e.g. in undiluted form, if applicable), unless otherwise specified in Table 74 for products with specific uses.

Cleaning product	Limits by weight of VOC	
	As used	As sold
Window cleaner	< 3%	< 25%
Degreaser	< 3%	< 25%
Industrial and institutional hard surface cleaner	< 5%	< 25%
Bathroom cleaner	< 1%	< 25%

*VOCs means any organic compound having an initial boiling point less than or equal to 250°C measured at a standard pressure of 101,3 kPa or having at 293,15K a vapour pressure higher than 0,01 kPa, demonstrated through laboratory testing or calculation from records of the amounts of constituents used to make the product where volatile means vapour pressure > 0,01kPa at 293.15K



Sub-criterion (a) Specific excluded in going substances

Assessment and verification: the applicant shall provide:

- a signed declaration of compliance supported by declarations from suppliers, if appropriate, confirming that the listed substances have not been included in the product formulation, either regardless of mass concentration (substances listed in (i)) or above specified concentration (substances listed in (ii)),
- for phosphorus:
 - a) information on the complexing agent in the product (detail information of the type of phosphorus-containing substances added as ingredients),
 - b) calculation of the product's total P-content.



Discussion and consultation questions

- Do you agree with the proposed structure of the criterion?
- Are some substances missing in the list of excluded substances?
- Do you agree with the proposed restriction on P-content for single product groups?

Sub-criterion (b)



2. Exclusions and limitations based on classification with hazard classes

Sub-criterion (b) Hazardous substances

The final product shall not be **classified and labelled** as being acutely toxic, a specific target organ toxicant, a respiratory or skin sensitiser, carcinogenic, mutagenic or toxic for reproduction, or hazardous to the environment, in accordance with CLP Regulation.

The product **shall not contain ingoing substances** meeting the criteria for classification as toxic, hazardous to the environment, respiratory or skin sensitizers, carcinogenic, mutagenic or toxic for reproduction in accordance with CLP Regulation and as interpreted according to the hazard statements listed in Table (x).

Any ingoing substance present at a concentration **above 0,010% w/w in the product** shall meet this requirement. Where stricter, the generic or specific concentration limits determined in accordance with Article 10 of CLP Regulation shall prevail to the cut-off limit value of 0,010% w/w.

Table x. Restricted hazard classifications and their categorisation

Acute toxicity	
Category 1 and 2	Category 3
H300 Fatal if swallowed	H301 Toxic if swallowed
H310 Fatal in contact with skin	H311 Toxic in contact with skin
H330 Fatal if inhaled	H331 Toxic if inhaled
H304 May be fatal if swallowed and enters airways	EUH070 Toxic by eye contact
Specific target organ toxicity	
Category 1	Category 2

Sub-criterion (b)



Sub-criterion (b) Hazardous substances – cont.

The most recent classification rules adopted by the Union shall take precedence over the listed hazard classifications in accordance with article 15 of CLP Regulation. The hazard statements generally refer to substances. **However, if information on substances cannot be obtained, the classification rules for mixtures shall apply.**

Ingoing substances which change their properties upon processing (e.g. become no longer bioavailable or undergo chemical modification) so that the hazards no longer apply and that any unreacted residual content of the hazardous substances is less than 0,010% w/w are exempted from this criterion x(b).

This criterion does not apply to ingoing substances covered by Article 2(7)(b) of the REACH which sets out criteria for exempting substances within Annex V from the registration, downstream user and evaluation requirements. In order to determine if this exclusion applies, the applicant shall screen any ingoing substance present at a concentration above 0,010% w/w.

Ingoing substances included in Table (x) are exempted from the requirement of this criterion.

Table x. Derogated substances [differ for single product groups]



- Surfactants:

H411 derogation for HDD removed

DD/LD/HDD/APC/IILD/IIDD		H400: Very toxic to aquatic life H412: Harmful to aquatic life with long-lasting effects
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- Subtilisin:

LD/ILLD DD/IIDD	Subtilisin*	H400: Very toxic to aquatic life H411: Toxic to aquatic life with long-lasting effects
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HDD / APC ?

Amendment - H411 derogation under ISC

- Enzymes:

All product groups	Enzymes*	H334: May cause allergy or asthma symptoms or breathing difficulties if inhaled H317: May cause allergic skin reaction
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* Including stabilisers and other auxiliary substances in the preparations.



PAP used as bleaching agent

LD/IILD	6-(phthalimido)peroxyhexanoic acid (PAP) used as bleaching agent at max concentration of 0.6 g/kg laundry	H400: Very toxic to aquatic life H412: Harmful to aquatic life with long-lasting effects
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Peracetic acid and hydrogen peroxide used as bleaching agent

IILD	Peracetic acid/ hydrogen peroxide bleaching agent*	H400: Very toxic to aquatic life H410: Very toxic to aquatic life with long-lasting effects
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NTA present as impurity in GLDA and MGDA

All product groups	NTA as an impurity in MGDA and GLDA (*)	H351: Suspected of causing cancer
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(*) in concentrations lower than 0.2 % w/w in the ingoing substance as long as the total concentration in the final product is lower than 0.10 % w/w

Change of threshold

- Removed derogations:

HDD	Surfactants	H411: Harmful to aquatic life with long-lasting effects
LD	Optical brighteners	H413: May cause long-lasting harmful effects to aquatic life



- Fragrances:

LD/IILD /DD/HD D/APC	Fragrances	H412: Harmful to aquatic life with long-lasting effects ???
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Kept ban on fragrances use in IIDD products

- Preservatives:

All product groups	Preservatives	
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Sub-criterion (b)



Sub-criterion (b) Hazardous substances – cont.

Assessment and verification: the applicant shall demonstrate compliance with criterion x(b) for the final product and for any ingoing substance present at concentrations greater than 0,010 % in weight in the final product. A declaration of compliance shall be provided by the applicant supported, where appropriate, by the declarations and safety data sheets from their supplier(s) that none of these substances meets the criteria for classification with one or more of hazard statements listed in Table 57 in the form(s) and physical state(s) they are present in the final product. Material safety data sheet for the final product shall also be provided.



Discussion and consultation questions

- Shall derogation be granted for subtilisin used in HDD products?
- Shall derogation be granted for subtilisin used in APC products?
- Do you agree with the derogation proposals for:
 - PAP
 - Peracetic acid/hydrogen peroxide bleaching agent
- How to proceed with derogation for preservatives and fragrances?

Sub-criterion (c)



3. Specific limitations by substance type/substance group

Sub-criterion (c) Substances of very high concern

The final product shall not contain any ingoing substances that have been identified according to the procedure described in Article 59(1) of REACH, which establishes the **candidate list for substances of very high concern**.

Assessment and verification: the applicant shall provide a declaration of compliance, supported by declarations from their suppliers, as appropriate, on non-presence of the candidate list substances.

Reference to the latest list of substances of very high concern shall be made on the date of application.

Sub-criterion (d)



Sub-criterion (d) Fragrances

Any ingoing substance added to the product as a fragrance shall be manufactured and handled following the code of practice of the International Fragrance Association (IFRA) available at <http://www.ifraorg.org>. The recommendations of the IFRA Standards concerning prohibition, restricted use and specified purity criteria for substances shall be followed by the manufacturer.

Assessment and verification: the applicant, their supplier or fragrance manufacturer, as appropriate, shall provide a signed declaration of compliance.

Sub-criterion (e)



REACH, CLP and EU Ecolabel values for BCF and log Kow

Sub-criterion (e) Preservatives

(i) The product may only include preservatives in order to preserve the product, and in the appropriate dosage for this purpose alone. This does not refer to surfactants, which may also have biocidal properties.

(ii) The product may contain preservatives provided that they are not bio-accumulating. A preservative is considered to be not bio-accumulating if $BCF < 100$ or $\log Kow < 3,0$. If both BCF and log Kow values are available, the highest measured BCF value shall be used.

(iii) It is prohibited to claim or suggest on the packaging or by any other communication that the product has an antimicrobial or disinfecting effect.

Assessment and verification: the applicant or their suppliers, as appropriate, shall provide a signed declaration of compliance, together with copies of the safety data sheets of any preservative added, and information on its BCF and/or log Kow values. The applicant shall provide also artwork of the packaging.

Sub-criterion (f)



Sub-criterion (f) Colouring agents

Colouring agents in the product shall not be bio-accumulating. A colouring agent is considered not bio-accumulating if BCF < 100 or log Kow < 3,0. If both BCF and log Kow values are available, the highest measured BCF value shall be used. In the case of colouring agents approved for use in food, it is not necessary to submit documentation of bio-accumulation potential.

Assessment and verification: the applicant or their suppliers, as appropriate, shall provide a signed declaration of compliance, together with copies of the safety data sheets of any colorant added together with information on its BCF and/or log Kow value, or documentation to ensure that the colouring agent is approved for use in food.

Sub-criterion (g)



Sub-criterion (g) Enzymes

Only enzyme encapsulates (in solid form) and enzyme liquids/slurries shall be used.

Assessment and verification: the applicant shall provide a declaration of compliance supported by copies of the safety data sheets of any enzyme added.



Sub-criterion (h) Micro-organisms

- (i) **Identification**: all intentionally added micro-organisms shall have an American Type Culture Collection (ATCC) number or belong to a collection of an International Depository Authority (IDA)
- (ii) **Safety**: all intentionally added micro-organisms shall belong to:
 - Risk Group I as defined by the Directive 2000/54/EC – biological agents at work
 - The Qualified Presumption of Safety (QPS) list issued by the European Food Safety Authority (EFSA)
- (iii) **Absence of contaminants**: pathogenic micro-organisms, as defined below, shall not be in any of the strains included or in the finished product when screened using the indicated test methods or equivalent:
 - E. Coli, test method ISO 16649-3:2005
 - Streptococcus (Enterococcus), test method ISO 21528-1:2004
 - Staphylococcus aureus, test method ISO 6888-1
 - Bacillus cereus, test method ISO 7932:2004 or ISO 21871
 - Salmonella, test method ISO6579:2002 or ISO 19250

Sub-criterion (h)



**For Hard Surface
Cleaners only
– NEW CRITERION**

Sub-criterion (h) Micro-organisms – Cont.

- (iv) All intentionally added micro-organisms shall not be GMO
- (v) Antibiotic susceptibility: all intentionally added micro-organisms shall be susceptible to each of the five major antibiotic classes (aminoglycoside, macrolide, beta-lactam, tetracycline and fluoroquinolones) in accordance with the EUCAST disk diffusion method or equivalent.
- (vi) Microbial count: products in their in-use form shall have a standard plate count equal or greater than 1×10^5 Colony Forming Units (CFU) per ml months according to ISO 4833-1:2014.
- (vii) Shelf life: the minimum shelf life of the product shall not be lower than 24 months and the microbial count shall not decrease by more than 10% every 12 months according to ISO 4833-1:2014.
- (viii) User information: the product label shall include the following information:
 - That the product contains micro-organisms
 - That the product shall not be used with a spray trigger mechanism
 - That the product should not be used on surfaces in contact with food
 - An indication on the shelf life of the product



Sub-criterion (h) Micro-organisms – Cont.

Assessment and verification: the applicant shall provide:

- (i) the name (to the strain) and identification of all micro-organisms contained in the product (ATCC or IDA numbers)
- (ii) documentation demonstrating that all micro-organisms belong to Risk Group I and the QPS list
- (iii) documentation demonstrating that the pathogenic micro-organisms are not present in the product
- (iv) documentation demonstrating that all micro-organisms are not GMO
- (v) documentation demonstrating that all micro-organisms are susceptible to each of the five major antibiotic classes indicated
- (vi) documentation of CFU per ml of in-use solution (for undiluted products, the dilution ratio recommended for "normal" cleaning shall be used)
- (vii) documentation of CFU per ml of in-use solution every 12 months for a product stored until the end of its shelf life. If the applicant is seeking an EU Ecolabel for a new formulation and such data is not available, the applicant shall provide the Competent Body with the information within one year.
- (viii) a copy of the product's label



Discussion and consultation questions

Micro-organisms

- Shall we keep the proposed criterion on micro-organisms used in Hard-surface cleaners
- Do you agree with the formulation of the criterion?
- Is the verification procedure clear?



**For Hand Dishwashing
Detergents only**

Criterion 6 Corrosive properties

The product shall not be classified as a 'Corrosive' (C) mixture with H314, or as a 'Skin corrosion, categories 1A, 1B, 1C' mixture in accordance with CLP Regulation.

Assessment and verification: the applicant shall provide the exact concentrations of all ingoing 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 H314 in accordance with CLP Regulation to the competent body. Declaration should be supported by the material safety data sheets.



European
Commission

Thank you

Content

Day 2: Wednesday, 21st October 2015

		SCHEDULE
1.	<p>Excluded and limited substances and mixtures criteria:</p> <ul style="list-style-type: none"> - Specifically excluded substances and mixtures - H-statements based restriction - Specific limited in-going substances: Preservatives, Fragrances, Micro-organisms, etc. - Other 	09:30 – 11:30
	Coffee break	11:30 – 12:00
2.	<p>Packaging Sustainable sourcing of ingredients</p>	12:00 – 13:30
	Lunch break	13:30 – 14:30
3.	<p>Fitness for use criteria User instructions / Professional training User information</p>	14:30 – 16:00
	Coffee break	16:00 – 16:30
4.	Any other non-horizontal criteria and remaining issues	16:30 - 17:30
5.	Summary and closure of the meeting	17:30 – 18:00



Packaging

- The main aims of the requirement is so to:
- Limit the amount of packaging thrown away
 - Ease the recyclability of the packaging
 - Gently push towards more concentrated products



Packaging

The weight/utility ratio (WUR) of the product shall be calculated for the primary packaging only and shall not exceed the following values for the reference dosage:

Product type	WUR

Plastic/paper/cardboard packaging containing more than 80 % recycled materials is exempted from this requirement.

Assessment and verification: the applicant shall provide the calculation of the WUR of the product. If the product is sold in different packaging (i.e. with different volumes), the calculation shall be submitted for each packaging size for which the EU Ecolabel shall be awarded. In the case of trigger sprays and the allocation of weight to the primary packaging, this shall be on the basis of pan-European sales data for the product, indicating unit sales of each.

The WUR is calculated as follows:

$$WUR = \sum ((W_i + U_i) / (D_i * R_i))$$



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The WUR is calculated as follows:

$$WUR = \sum ((W_i + U_i) / (D_i * R_i))$$



Packaging

$$WUR = \sum ((W_i + U_i) / (D_i * R_i))$$

Where:

W_i : weight (g) of the primary packaging (i),

U_i : weight (g) of non-recycled packaging in the primary packaging (i). $U_i = W_i$ unless the applicant can document otherwise,

D_i : number of reference doses contained in the primary packaging (i),

R_i : number of times that the primary packaging (i) can be refilled and used for the same purpose. $R_i = 1$ (packaging is not reused for the same purpose) unless the applicant can document a higher number.

The applicant shall provide a signed declaration for the content of recycled material, along with relevant documentation. Packaging is regarded as recycled if the raw material used to make the packaging has been collected from packaging manufacturers at the distribution stage or at the consumer stage. Where the raw material is industrial waste from the material manufacturer's own production process, then the material will not be regarded as recycled.



Packaging

$$WUR = \sum ((W_i + U_i) / (D_i * R_i))$$

Where:

W_i : weight (g) of the primary packaging (i),

U_i : weight (g) of non-recycled packaging in the primary packaging (i). $U_i = W_i$ unless the applicant can document otherwise,

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Packaging

Product type	WUR
Laundry detergent	1,20 g

Water hardness	Soft	Medium	Hard
Product type	<1,5 mmol CaCO ₃ /l	1.5 – 2,5 mmol CaCO ₃ /l	> 2,5 mmol CaCO ₃ /l
Powders	1,5	2,0	2,5
Liquids	2,0	2,5	3,0



Packaging

Product type	WUR
<u>Laundry detergent</u>	<u>1,20 g</u>

Water hardness	Soft	Medium	Hard
Product type	<1,5 mmol CaCO ₃ /l	1.5 – 2,5 mmol CaCO ₃ /l	> 2,5 mmol CaCO ₃ /l
Powders	1,5	2,0	2,5
Liquids	2,0	2,5	3,0



Packaging

Product type	WUR
Dishwasher detergents	2,4 g
Rinse aids	1,5 g

Product type	Water hardness	Soft	Medium	Hard
		<1,5 mmol CaCO ₃ /l	1.5 – 2,5 mmol CaCO ₃ /l	> 2,5 mmol CaCO ₃ /l
Powders		0,8 g	1,4 g	2,0 g
Liquids		1,0 g	1,8 g	2,5 g



Packaging

Product type	<u>WUR</u>
Dishwasher detergents	<u>2,4 g</u>
<u>Rinse aids</u>	<u>1,5 g</u>

Product type	Water hardness	Soft	Medium	Hard
		<1,5 mmol CaCO ₃ /l	1.5 – 2,5 mmol CaCO ₃ /l	> 2,5 mmol CaCO ₃ /l
Powders		0,8 g	1,4 g	2,0 g
Liquids		1,0 g	1,8 g	2,5 g



Packaging

Product type	WUR
Hand dishwashing detergent	0,25 g

Product type	WUR
Undiluted products	15 g
RTU products	150 g
RTU products sold in bottles with trigger sprays	200 g



Packaging

Product type	WUR
Hand dishwashing detergent	<u>0,25 g</u>

Product type	WUR
Undiluted products	<u>15 g</u>
RTU products	150 g
<u>RTU products sold in bottles with trigger sprays</u>	<u>200 g</u>



Packaging

For hard-surface cleaning products:

(a) Products sold in spray bottles

Sprays containing propellants must not be used. Products packaged in trigger sprays must be sold as a part of a refillable system.

Assessment and verification: the applicant or retailer shall document that refills shall be available for purchase on the market.



Packaging

For hard-surface cleaning products:

(a) Products sold in spray bottles

Sprays containing propellants must not be used. Products packaged in trigger sprays must be sold as a part of a refillable system.

Assessment and verification: the applicant or retailer shall document that refills shall be available for purchase on the market.



Packaging

Plastic packaging shall be designed to facilitate effective recycling by avoiding potential contaminants and incompatible materials that are known to impede separation or reprocessing or to reduce the quality of recyclate. The label or sleeve, closure and, where applicable, barrier coatings shall not comprise, either singularly or in combination the materials and components listed in Table 72. Pumps are exempted from this requirement.

Table 72. Materials and components excluded from packaging elements

Packaging element	Excluded materials and components
Label or sleeve	<ul style="list-style-type: none"> - PS label or sleeve in combination material used with a PET, PP or HDPE bottle - PVC label or sleeve in combination with a PET, PP or HDPE bottle - PETG label or sleeve in combination with a PET bottle - Sleeves made of different polymer than the bottle - Labels or sleeves that are metallised or are welded to a packaging body (in mould labelling)
Closure	<ul style="list-style-type: none"> - PS closure in combination a with a PET, HDPE or PP bottle - PVC closure in combination with a PET, PP or HDPE bottle - PETG closures and/or closure material with density of above 1 g/cm³ in combination with a PET bottle - Closures made of metal, glass, EVA - Closures made of silicone. Exempted are silicone closures with a density < 1 g/cm³ in combination with a PET bottle and silicone closures with a density > 1g/cm³ in combination with PEHD or PP bottle - Metallic foils or seals which remain fixed to the bottle or its closure after the product has been opened
Barrier coatings	Polyamide, EVOH, functional polyolefins, metallised and light blocking barriers



Discussion

- Do you agree with the proposed limits?
- Feedback is sought for the assessment and verification of sub-criterion on WUR.

Content

Day 2: Wednesday, 21st October 2015

		SCHEDULE
1.	<p>Excluded and limited substances and mixtures criteria:</p> <ul style="list-style-type: none"> - Specifically excluded substances and mixtures - H-statements based restriction - Specific limited in-going substances: Preservatives, Fragrances, Micro-organisms, etc. - Other 	09:30 – 11:30
	Coffee break	11:30 – 12:00
2.	<p>Packaging</p> <p>Sustainable sourcing of ingredients</p>	12:00 – 13:30
	Lunch break	13:30 – 14:30
3.	<p>Fitness for use criteria</p> <p>User instructions / Professional training</p> <p>User information</p>	14:30 – 16:00
	Coffee break	16:00 – 16:30
4.	Any other non-horizontal criteria and remaining issues	16:30 - 17:30
5.	Summary and closure of the meeting	17:30 – 18:00



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

Ingoing substances used in the products which are derived from palm oil or palm kernel oil shall be sourced from plantations that meet the criteria for sustainable management that have been developed by multi-stakeholder organisations that have a broad membership including NGOs, industry and government.

Assessment and verification: the applicant shall provide third-party certifications that the palm oil and palm kernel oil used in the manufacturing of the product originates from sustainably managed plantations. Certifications accepted shall include RSPO (by identity preserved, segregated or mass balance) or any equivalent scheme based on multi-stakeholder sustainable management criteria. For chemical derivatives of palm oil and palm kernel oil, it is acceptable to demonstrate sustainability through book and claim systems such as GreenPalm or equivalent.



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

- ***CEN initiative on bio-surfactants***

- Definition of what a bio-surfactant is
- Currently no set plans to include environmental or social criteria

- ***Credibility of certification schemes***

- Existing criticisms of RSPO
 - IKEA proposes to build on RSPO for the palm oil policy (policy to come into be fully put in place in 2017)
 - No large scale alternatives
- Book & Claim does not guarantee that the bio-surfactants come from a sustainable source.



Discussion

- Feedback based on experiences from Rinse-Off Cosmetics welcome!

Content

Day 2: Wednesday, 21st October 2015

		SCHEDULE
1.	<p>Excluded and limited substances and mixtures criteria:</p> <ul style="list-style-type: none"> - Specifically excluded substances and mixtures - H-statements based restriction - Specific limited in-going substances: Preservatives, Fragrances, Micro-organisms, etc. - Other 	09:30 – 11:30
	Coffee break	11:30 – 12:00
2.	<p>Packaging</p> <p>Sustainable sourcing of ingredients</p>	12:00 – 13:30
	Lunch break	13:30 – 14:30
3.	<p>Fitness for use criteria</p> <p>User instructions / Professional training</p> <p>User information</p>	14:30 – 16:00
	Coffee break	16:00 – 16:30
4.	Any other non-horizontal criteria and remaining issues	16:30 - 17:30
5.	Summary and closure of the meeting	17:30 – 18:00

Content

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5.	Summary and closure of the meeting	17:30 – 18:00

Laundry detergents



1. Main points

1. Tested against standard detergent (Type A detergent – phosphate free)
2. Tested by means of a testing protocol
3. **Minor modifications proposed in the EU Ecolabel protocol**

2. Criteria text

Tests shall be carried out to ensure that the product has a **satisfactory wash performance at the lowest temperature and dosage recommended by the manufacturer for the water hardness** according to the EU Ecolabel protocol available at:
<http://ec.europa.eu/environment/ecolabel/documents/Performance%20Test%20Laundry%20Detergents.pdf>

The test shall be preferentially performed by a laboratory complying with the relevant harmonized standards for testing and calibration laboratories.

Assessment and verification:

The applicant shall provide documentation confirming that the product has been tested under the protocol conditions and that the test results passed the minimum washing performance required.

Information shall be provided on the compliance within the laboratory requirements included in the relevant harmonized standards for testing and calibration laboratories, if appropriate.

Modifications in the laundry detergents protocol

- pages 5 and 24: replace the name 'low-duty detergent' by 'light-duty detergent'
- page 5: replace "see Annex 1 for all definitions found in this document" by "see Annex 1 for all abbreviations found in this document"
- page 5: replace 'washing machine types' by 'washing machine reference'
- page 6: replace '2.5 mmol/L \pm 0.2 mmol/L calculated as CaCO₃ (250ppm=14 \pm 0.5 $^{\circ}$ dH).' by '2.5 \pm 0.2 mmol CaCO₃/l (equivalence used 250 ppm CaCO₃=14 \pm 0.5 $^{\circ}$ dH).'

- page 6: replace

'2.3 Water Inlet Temperature: 20.0 \pm 2.0 $^{\circ}$ C

Products which claim to be efficient at a wash temperature lower than 20 $^{\circ}$ C shall be tested at 15 $^{\circ}$ C. In this case, the water inlet temperature will be different to the wash temperature for tested product (15.0 \pm 2.0 $^{\circ}$ C) and reference detergent (20.0 \pm 2.0 $^{\circ}$ C).

By

'2.3 Water Inlet Temperature: 20.0 \pm 2.0 $^{\circ}$ C

Products which claim to be effective at a wash temperature lower than 20 $^{\circ}$ C shall be tested at 15 $^{\circ}$ C. If so, the water inlet temperature will for tested product (15.0 \pm 2.0 $^{\circ}$ C) and for reference detergent (20.0 \pm 2.0 $^{\circ}$ C).

- page 24: replace 'definitions' by 'abbreviations'

Dishwasher detergents



1. Main points

1. Tested against standard detergent (Type B IEC 436 – **phosphate free**)
2. Tested updated IKW protocol or updated EN50242/IEC60436 modified
3. **Clarifications added to the IEC60436 modifications**

2. Criteria text

The product shall have a satisfactory cleaning performance at the recommended dosage according to most updated IKW protocol available at http://www.ikw.org/fileadmin/content/downloads/Haushaltspflege/HP_DishwasherA_B_e.pdf

or the **most updated** standard EN 50242/IEC 60436 modified

If rinse aid and salt functions are a part of a multifunctional product the effect of the claimed functions must be documented by test.

An equivalent test to the IKW test or the modified version of EN 50242/IEC 60436 may be used if equivalence has been assessed and accepted by the Competent Body.

The test shall be preferentially performed by a laboratory complying with the relevant harmonized standards for testing and calibration laboratories.

Dishwasher detergents



3. Main modifications to the EN50242: EN 60436 standard

- The tests shall be carried out at $50C \pm 2C$ (or at a lower temperature if the detergent claims to be efficient at a temperature below $50C$) with cold pre-wash without detergent. The reference product shall be always tested at $50C$, regardless the claims of the testing product (detergent to be awarded)
- The machine used in the test shall be connected to cold water and must hold 12ps and a cleaning performance (oven drying method) in average values of 3.55 ± 0.20 as described in Annex N of the EN50242: EN 60436
- A weak acidic rinsing agent in accordance with the standard (formula III) shall be used
- The rinsing aid dosage shall be a setting at level 3. 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.
- The dosage of dishwasher detergent shall be as recommended by the manufacturer
- Three attempts shall be carried out at a water hardness in accordance with the standard EN 50242/IEC 60436.
- An attempt consists of five washes where the result is read after the fifth wash without the dishes being cleaned between the washes
- The result shall be better than or identical to the reference detergent after the fifth wash

Dishwasher detergents



3. Main modifications to the EN50242: EN 60436 standard

- Recipe for the reference detergent (Detergent B IEC 436) and rinsing agent (formula III), **can be found in Annex D in the standard EN 50242/IEC 60436**. The quantities (dosage used) shall be as recommended by the manufacturer of the reference product, but shall not be more than the limits included in the section 5.7 of the standard EN 50242/IEC 60436 for the detergent and section 5.8 of the standard EN 50242/IEC 60436 for the rinse aid agent

4. Assessment and verification

The applicant shall provide documentation confirming that the product has been tested under the specified conditions and fulfilled the requirements.

Information should be provided on:

- (a) The standard conditions used to perform the testing
- (b) The recommended dosage and the lowest recommended wash temperature at which the product claims to be effective
- (c) Test report and test results showing the cleaning performance of the dishwasher detergent (testing product)
- (d) **The compliance within the laboratory requirements included in the relevant harmonized standards for testing and calibration laboratories, if appropriate**

I&I laundry detergents



1. Main points

1. Tested against a **well-established product on the market or the product normally used by the user.**
2. Tested by a user test only
3. Clarifications added to the assessment and verification section

2. Criteria text

A user test should be used to document the washing primary laundering effects of the detergent. The user test should meet the requirements stated in Appendix II.

For user test the following apply:

- The test product must be tested against a reference product.
- The reference product may be a well-established product on the market or the product normally used by the user.
- The test product must show efficiency equal to or better than the reference product.

I&I laundry detergents



3. User test

- 1- Responses must be obtained from at least five test centres representing a selection of customers
- 2- The procedure and dosage must conform to the manufacturer's recommendations.
- 3- The test period must continue for at least four weeks.
- 4- Every test centre must assess the serviceability of the product or multi-component system, dosability, compressibility, rinsing and solubility.
- 5- Every test centre must assess the effectiveness of the product or multi-component system by answering questions relating to the following aspects (or similar formulations):
 - a) ability to launder lightly, moderately or heavily soiled articles to be washed;
 - b) an assessment of primary laundering effects such as dirt removal, stain removal capacity and bleaching effect must be rated;
 - c) assessment of secondary laundering effects such as greying of white washing and colour-fastness and staining of coloured washing;
 - d) assessment of the effect of the rinsing agent on drying, ironing or mangling of the articles to be washed;
 - e) how satisfied the test subject is with customer visiting arrangements

3. User test

6- The response must be rated on a scale comprising at least three levels, for example,

- 'insufficiently effective',
- 'sufficiently effective' or
- 'very effective'.

With regard to how satisfied the test centre is with visit reporting arrangements, the categories must be

- 'not satisfied',
- 'satisfied' and
- 'very satisfied'.

7- At least five test centres must submit responses. At least 80 % must rate the product as sufficiently effective or very effective on all points (see point 4 and be satisfied or very satisfied with customer visiting arrangements)

8- All raw data from the test must be specified

9- The test procedure must be described in detail.

4. Assessment and verification

The applicant shall provide a test report providing information on:

- (a) Information about the test centres where the detergent was tested and how/why they represent a selection of customers.
- (b) Information about the products usually used by the test centres (reference products): recommended dosage, washing temperature, product's ability to remove soiling, date of purchase
- (c) Information about the test procedure: type of spots and type of textile, information about the professional washing machines and washing programs (eg temperature, duration, rinsing, etc), and the effectiveness of other products the detergent shall be used with (eg. Rinse-aids)
- (d) all reply forms received from the test users and the overall result on the wash performance of detergent specified in a table/a form. The overall result must be rated in accordance with point 6 of Appendix II
- (e) Information on how satisfied the test centre is with visit reporting arrangements and the categories rated (point 5 of Appendix II)

I&I dishwasher detergents



1. Main points

1. Tested against a product normally used by the user.
2. Tested by a user test only
3. Clarifications added to the assessment and verification section

2. Criteria text

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 user tests. The user test should meet the requirements stated in Appendix II.

The test product must be tested against a reference product. **The reference product may be a well-established product on the market or the product normally used by the user.** The reference product shall be tested at the lowest recommended dosage by the manufacturer and if no dosage is recommended it should be the same dosage used as for the test product. The test product must show efficiency equal to or better than the reference product.

When applying for rinse aids in combination with the industrial and institutional 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

I&I dishwasher detergents



3. User test

1. Responses must be obtained from at least five test centres representing a random selection of customers.
2. The procedure and dosage must conform to the manufacturer's recommendations.
3. The test period must continue for at least four weeks with at least 400 test cycles.
4. Every test centre must assess the effectiveness of the product or multi-component system by answering questions relating to the following aspects (or similar formulations):
 - the product's ability to remove soiling from the dishes,
 - the product's ability to dry the dishes,
 - the respondent's satisfaction with the agreement on customer visits.
5. The response must be rated on a scale comprising at least three levels, for example, 'insufficiently effective', 'sufficiently effective' or 'very effective'. With regard to how satisfied the test centre is with visit reporting arrangements, the categories must be 'not satisfied', 'satisfied' and 'very satisfied'.
6. At least 80 % must rate the product as sufficiently effective or very effective on all points (see point 4) and be satisfied or very satisfied with customer visiting arrangements.
7. All raw data from the test must be specified.
8. The test procedure must be described in detail.

4. Assessment and verification

The applicant shall provide documentation confirming that the product has been tested under the Appendix II conditions.

- (a) Information about the test centres where the detergent was tested and how they represent a selection of customers.
- (b) Information about the products usually used by the test centres (reference product): recommended dosage, washing temperature, product's ability to remove soiling, date of purchase
- (b) Information about the test procedure: type of spots and type of dishware, information about the professional dishwasher machine and dishwashing program (eg temperature, duration, drying, etc), and the effectiveness of other products the detergent shall be used with.
- (c) all reply forms received from the test users and the overall result on the cleaning performance of detergent specified in a table/ a form. The overall result must be rated in accordance with Appendix II point 6

Hand dishwasher detergents



1. Main points

1. Tested against a **generic formulation**
2. Tested by a **user test only**
3. Clarifications added to the **assessment and verification section**

2. Criteria text

Tests shall be carried out to ensure that the product has a satisfactory wash performance at the **lowest temperature and dosage recommended by the manufacturer for the water hardness** according to the 'Framework for testing the performance of hand dishwashing detergents' available at:

http://ec.europa.eu/environment/ecolabel/documents/performance_test.pdf

If no dosage instructions are provided, the same dosage is used as for the test product.

The test shall be preferentially performed by a laboratory complying with the relevant harmonized standards for testing and calibration laboratories.

The generic reference detergent shall be the one prescribed in IKW performance test 'Recommendation for the quality assessment of the cleaning performance of hand dishwashing detergents' (SÖFW-Journal, 128, 5, pp. 11-15, 2002) with the adaptation that the dosage applied in the performance test is set at 2.5 millilitres of the reference detergent per 5 litres of water.

The cleaning ability and cleaning capacity must be equivalent to or better than that of the generic reference detergent.

Hand dishwasher detergents



3. Main modifications in the EU Ecolabel protocol

Number of repetitions : increased from 5 to 15.

4. Assessment and verification

The applicant shall provide documentation confirming that the product has been tested under the framework conditions. The report must include all the points listed in the "documentation" section of the 'Framework for testing the performance of hand dishwashing detergents'

Information should be provided on the compliance within the laboratory requirements included in the relevant harmonized standards for testing and calibration laboratories, if appropriate.

Hard surface cleaners



1. Main points

1. Tested against a market product for the same purpose (dilute, RTU, professional or consumer application, surface to be cleaned, etc) or a **generic formulation for toilette cleaners (not bathroom cleaners)**
2. Tested by
 1. consumer products: a laboratory tests
 2. professional products: a user test

2. Criteria text

The product shall be fit for use, meeting the needs of the consumers. **Products intended for non-professional use should be tested through a laboratory test. The test shall be preferentially performed by a laboratory complying with the relevant harmonized standards for testing and calibration laboratories. Products intended for industrial and institutional use should be tested through a user test.**

The cleaning ability must be equivalent to or better than that of a **reference product (market product or generic reference product representative of the current products on the market), approved by a competent body** and better than water alone. The generic reference detergent for toilet cleaners shall be the one prescribed in IKW performance test 'Recommendation for the quality assessment of acidic toilet cleaners' (SÖFW-Journal, 126, 11, pp. 50-56, 2000).

Hard surface cleaners



3. Main modifications in the EU Ecolabel protocol

Cleaner	Soiling
Bathroom cleaner	Fat removing Descaling (limesoap and limescale) Particulate matter
Toilet cleaner	Fat removing Descaling (limescale) Particulate matter
Kitchen cleaner	Fat removing Burnt soiling Particulate matter Descaling (limesoap and limescale)

Cleaner	Soiling
Hard surface cleaner	Fat removing Particulate matter
Window cleaner	Fat removing (finger-prints) Particulate matter Strip-less drying

4. Assessment and verification

The applicant shall submit tests that must be carried out and reported within specified parameters as stated in the framework described in '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/documents/performance_test_cleaners.pdf

Information shall be provided on the compliance within the laboratory requirements included in the relevant harmonized standards for testing and calibration laboratories, if appropriate



European
Commission

Discussion

Content

Day 2: Wednesday, 21st October 2015

		SCHEDULE
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	Coffee break	11:30 – 12:00
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	Lunch break	13:30 – 14:30
3.	<p>Fitness for use criteria</p> <p>User instructions / Professional training</p> <p>User information</p>	14:30 – 16:00
	Coffee break	16:00 – 16:30
4.	Any other non-horizontal criteria and remaining issues	16:30 - 17:30
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User information

The detergent shall be accompanied by instructions for proper use so as to maximise product performance and minimise waste and use of resources. These instructions shall be legible or include graphical representation or icons and include information on (if appropriate)

- **Dosing instructions**

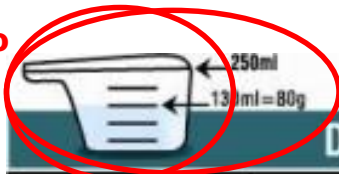
The applicant shall take suitable steps to help consumers respect the recommended dosage, making available the dosing instructions and if possible a convenient dosage system (eg caps). Dosing instruction shall include information on the recommended dosage in g or ml or second or alternative metric may be given in brackets (eg capsules, squirt or other if the packaging has a dosage system).

Recommended dosage for a standard load for at least two levels of soiling shall be included.

Information on the impact of water hardness on dosing and indication of the most prevalent water hardness in the area where the product is intended to be market or where this information can be found shall be provided.

• Dosing instructions (example: LD)

Helping consumers to respect the dosage: measures in caps



Dosing instructions in ml and g. The equivalence to caps is understood thanks to the icon.

DOSAGE				
4,5 kg	 Lightly soiled	 Normally soiled	 Heavily soiled	
 Soft	80ml	110ml	160ml	
 Medium	100ml	130ml	200ml	
 Hard	130ml	160ml	240ml	
For 3-4kg wash: Reduce dose by 40ml.		For 6-7kg wash: Increase dose by 80ml.		
PRE-WASH	Add 80ml of detergent into pre-wash compartment			
HANDWASH	Dissolve 50ml of detergent in 5 litres of water and then add the clothes.			

Recommended dosage for a standard load (4.5kg) at least two levels of soiling

Information on the impact of water hardness on dosing

MISSING:

Indications of the most prevalent water hardness in the area where the product is intended to be marketed



- **Dosing instructions (example: APC)**

Helping consumers to respect the dosage: measures in caps



Dosierung und Anwendung

Für ein optimales Ergebnis wenden Sie folgende Dosierung an:

- **Große Oberflächen:** Geben Sie **2 Dosierkappen in 6L Wasser**. Entfernt mühelos jede Art von Schmutz ohne Schrubben und Nachwischen.

- **Hartnäckige Flecken:** Geben Sie **einige Tropfen direkt auf den Fleck**. Wischen Sie mit einem feuchten Schwamm nach. Nicht auf nicht-abwaschbaren Oberflächen wie gewachstem oder unbehandeltem Holz und Aluminium verwenden. Im Zweifelsfall an unauffälliger Stelle testen.

Recommended dosage for two levels of soiling

MISSING
Dosing instructions in ml and g.
Information given in caps or drops

User information

- Resource saving measures

An indication on the primary packaging shall encourage users to use the lowest appropriate temperature the product claims effectiveness, to wash full loads, to use as little detergent and water as necessary, when appropriate.

- Packaging disposal information

The primary packaging shall include information on the reuse, recycling and/or correct disposal of packaging

- Environmental information

The following text should appear on the primary packaging:

"All detergents have an effect on the environment. For maximum effectiveness always use the correct dose and, the lowest recommended temperature. This will minimize both energy and water consumption and reduce water pollution"

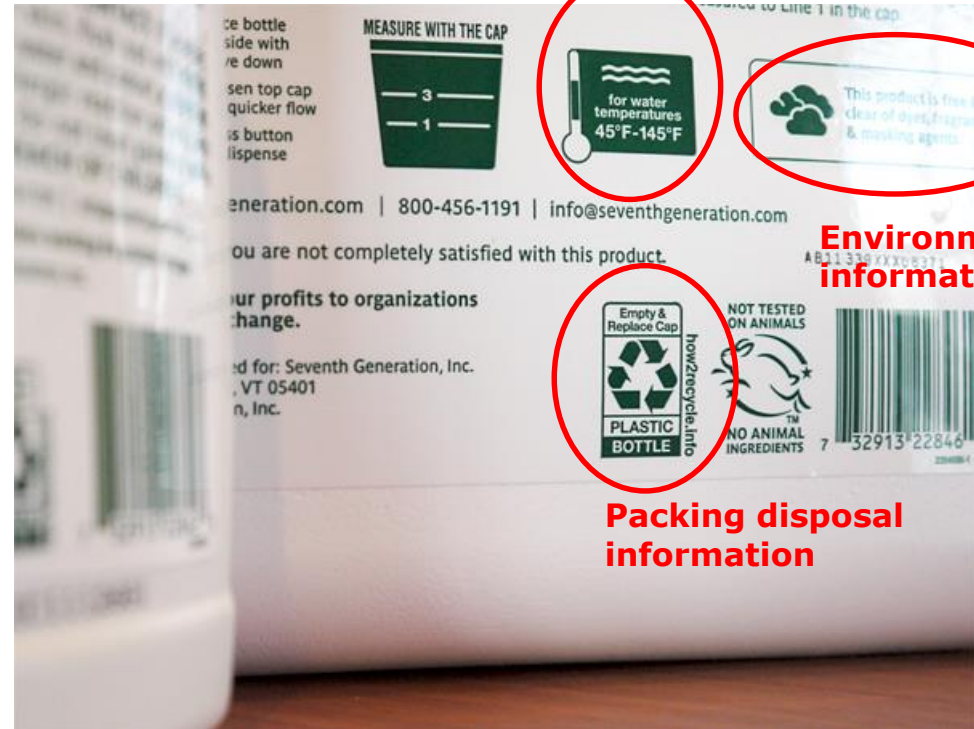


European Commission

Packing disposal information



Recommendation for water temperature



Environmental information

Packing disposal information

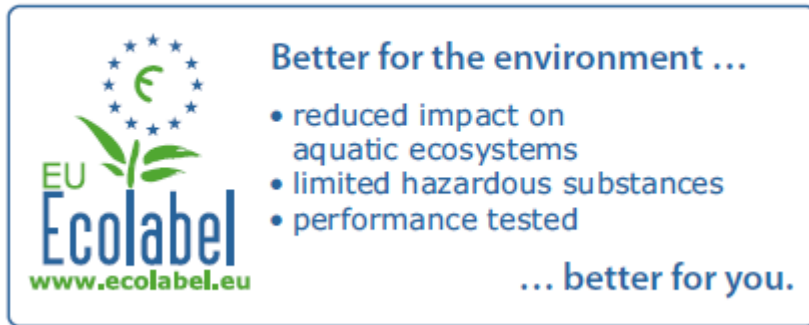
Information appearing on the EU Ecolabel

The logo should be visible and legible. The EU Ecolabel registration/licence number must appear on the product and it must be legible and clearly visible. Optional label with text box shall contain the following text

- Harm to aquatic life is limited
- Amount of hazardous substances is restricted
- Tested for wash performance

EU Ecolabel example

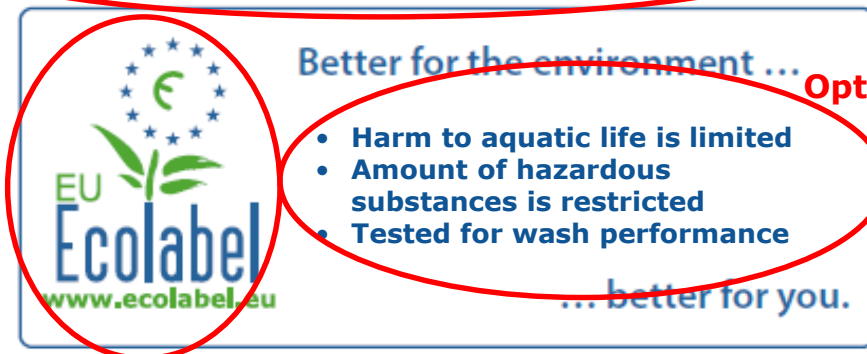
Registration number EU Ecolabel: DE/038/018



Existing EU Ecolabel

Legible and clearly visible EU Ecolabel registration number

Registration number EU Ecolabel: DE/038/018



EU Ecolabel logo is visible and legible

Optional text

Proposed EU Ecolabel



Discussion

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