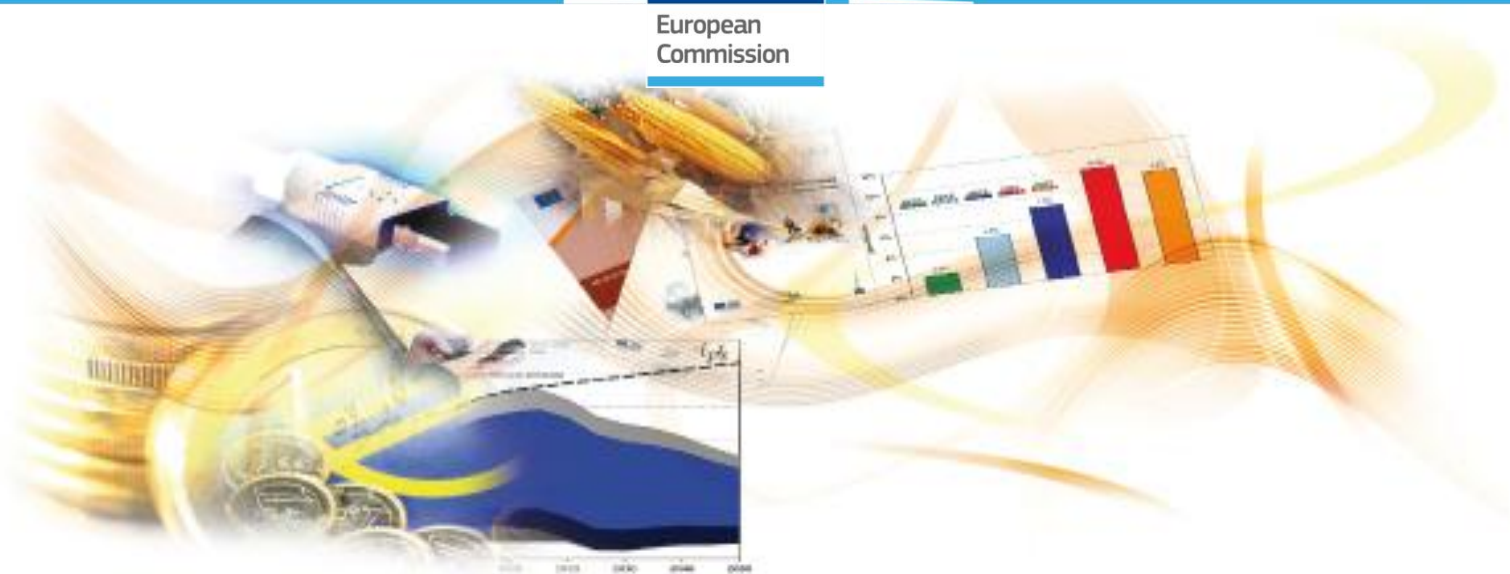




European
Commission



J R C T E C H N I C A L R E P O R T S

Revision of European Ecolabel Criteria for all-purpose cleaners and sanitary cleaners

Technical report and draft criteria proposal (TASK 5)
For the 1st AHWG meeting
(Draft)

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1 INTRODUCTION

The following Technical Report presents a proposal of revised EU Ecolabel criteria for the product group of "all-purpose cleaners and sanitary cleaners" (APC). The study has been carried out by the Joint Research Centre's Institute for Prospective Technological Studies (JRC-IPTS) with technical support from Oakdene Hollins and PRé Consultants. The work is being developed for the European Commission's Directorate General for the Environment.

The recommendations for the revision of the current criteria are based on technical analysis, including a Life Cycle Assessment (LCA) assessing the environmental impacts of products covered by the scope of the product group and other scientific sources, and input received from stakeholders.

This document is complemented by the Preliminary Report¹ on the revision of the European Ecolabel criteria for All-purpose Cleaners and Sanitary Cleaners and a Technical Annexe. The Preliminary Report covers in detail areas such as: scope and legislative analysis (Task 1), market analysis (Task 2), technical analysis (Task 3) and improvement potential (Task 4). The Technical Annexe is common to all detergent product groups as they share common issues and the revisions of their EU Ecolabel criteria are being done at the same time in order to facilitate harmonisation between criteria, where appropriate.

In all, there are six sets of EU Ecolabel criteria in the detergent product groups. These are:

- laundry detergents (LD),
- industrial and institutional laundry detergents (IILD),
- detergents for dishwashers (DD),
- industrial and institutional automatic dishwasher detergents (IIDD),
- hand dishwashing detergents (HDD),
- all-purpose cleaners and sanitary cleaners (APC).

The present document is specific to the set of criteria related to the EU Ecolabel for all-purpose cleaners and sanitary cleaners. Its main purpose is to summarise the proposed criteria changes as well as provide a brief overview of background information related to each criterion and the rationale behind the proposal. Where these are common for different EU Ecolabel product groups and/or are due to harmonisation efforts, reference is made to a section of the Technical Annexe. Both documents, as well as the Preliminary Report, should be consulted to gain a full understanding of this revision process.

A revision of EU Ecolabel criteria must ensure that, based on impacts of the products covered by the EU Ecolabel for "all-purpose and sanitary cleaners" at all life-cycle stages:

- The existing criteria are still relevant and that appropriately challenging targets, thresholds or usage information are established based on the latest knowledge of market norms, user behaviours, life-cycle impacts and hazards.
- Any new candidates for criteria suggested by either the LCA or the stakeholder survey are adequately considered and evaluation criteria justified.
- Opportunities to rationalise criteria, i.e. remove, simplify and combine (within the group) or harmonise (between product groups), are examined and justified.

The main criteria changes proposed in this report are as follows:

- A change of the name of the EU Ecolabel to "cleaning products" as the current name does not accurately reflect the product groups covered.
- A clarification and extension of the current scope and definition to include ready-to-use and undiluted products in all products groups covered, including window cleaners and sanitary cleaners.

¹ <http://susproc.jrc.ec.europa.eu/detergents/stakeholders.html>

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- An update of several criteria with updates values and new values for categories of products that are not covered in the current criteria.

2 PRELIMINARY REPORT – SUMMARY AND LINKS TO THE REVISION AND/OR DEVELOPMENT OF EU ECOLABEL CRITERIA

The Preliminary Report presents the research carried out, through stakeholder surveys, market analysis, legal review and an environmental performance investigation, on areas related to the product groups covered by the EU Ecolabel on all-purpose cleaners and sanitary cleaners. The report provides background information that underpins to the new criteria proposals.

The main findings of the Preliminary Report are:

-The *market analysis* reported that the total retail value of the EU market for hard surface cleaning is €5,7 bn. The cleaning market across Europe can be further categorised as all-purpose cleaners (46 %), window/glass cleaners (4 %), sanitary cleaning (36 %) and other ancillary cleaning products (14 %). Consumer choice of cleaning products is driven by ease of use and convenience of the product, price, health and safety during use and efficacy of the product.

-The *technical analysis* found that the key environmental impacts of APCs can be summarised as follows:

- The life cycle stage with the largest contribution to the environmental impact profile of all-purpose cleaners is the ingredient extraction stage. For window/glass cleaners packaging has a larger contribution than ingredient extraction.
- When warm water is used to rinse off the product during use, the use phase has a significant impact. However, this is only relevant for some of the products covered by this product group, such as kitchen cleaners and all-purpose cleaners.
- Based on the normalisation assessment, by far the most important impact category for all-purpose cleaners in Europe is Natural Land Transformation.

The results of the LCA for a general purpose cleaner, conducted as part of the technical analysis (Chapter 4 of the Preliminary Report) are shown in Figure 1. A generic general purpose cleaner was chosen as the representative product for the different product groups covered by the EU Ecolabel as this product type has the largest market share for cleaning products in Europe.

Ingredient extraction is an important contributor to the characterised midpoint results, particularly for the terrestrial ecotoxicity, agricultural land occupation and natural land transformation impact categories. Of all the ingredients, the majority of the environmental impact can be attributed to ethoxylated alcohol surfactants. The manufacturing, use and disposal phases also represent important contributors to the overall environmental impact.

The key environmental performance indicators (KPIs), i.e. those variables that mainly drive the results for APCs in Europe, based on the results of this study, are (not ranked):

- Amount of product used per application,
- Formulation – specifically the choice and amount of surfactant,
- Energy consumed to heat the water (if warm water is used),
- Energy source used to heat the water (if warm water is used).

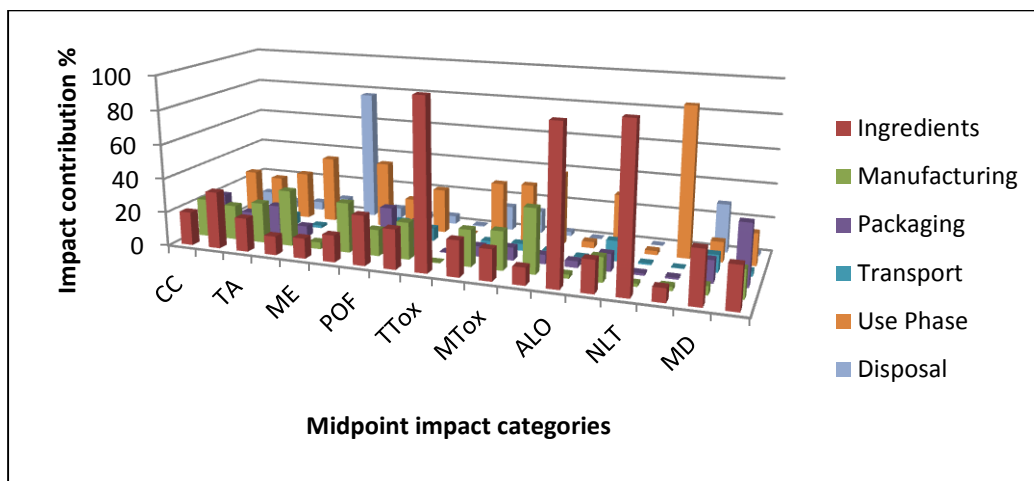


Figure 1: Impact contribution of different life cycle stages of an all-purpose cleaner

Apart from the LCA analysis, a revision of other scientific evidences, current national schemes and legislation have been performed. These sources of information pointed out the potential presence of hazardous substances in the product that can have environmental and health impacts, and these are addressed according to Articles 6.6 and 6.7 of the Regulation EC/66/2010 on the EU Ecolabel².

This document shows the process and the evidences to draft the EU Ecolabel criteria that tackle the mentioned main environmental impacts identified through the LCA analysis and the non-LCA impacts identified by revising other sources. The EU Ecolabel criteria are developed to directly or indirectly address the identified LCA and non-LCA impacts (eg the choice and amount of surfactants is an environmental impact directly addressed through one or several EU Ecolabel criteria while the amount of detergent is indirectly addressed). The "energy source used to heat the water" is the only environmental impact that cannot be addressed through the EU Ecolabel as it is not directly linked to the products; even when consumers can choose the source of energy to heat the water or an electricity provider with a share of renewable energies, this is something out of the scope of what can be promoted through a product environmental label.

Moreover, even though waste generation was not among the top 4 KPIs named previously, it can still have an impact of up to 37% for some environmental aspects. This environmental impact score can even being higher in the case of window cleaners. Given the prevalence of cleaners in everyday life and the fact that they all come with packaging, a relatively small impact can quickly add up; thus, this aspect is also considered in the EU Ecolabel.

Table 1 shows the link between the LCA and non-LCA impacts identified in the Preliminary Report and the revised or newly developed EU Ecolabel criteria.

Table 1: Link between the hotspots identified (LCA and non-LCA impacts) and the revised EU Ecolabel criteria

Identified hotspots (LCA and non-LCA impacts)	% of total impact ³	Revised or new EU Ecolabel criteria	Comments on the related criteria

² Regulation (EC) No 66/2010 of the European Parliament and of the Council of November 25 2009 on the EU Ecolabel

³ Information provided in chapter 5 of the Preliminary Report, although aggregated in a different way, available at: <http://susproc.jrc.ec.europa.eu/detergents/stakeholders.html>

Identified hotspots (LCA and non-LCA impacts)	% of total impact³	Revised or new EU Ecolabel criteria	Comments on the related criteria
Wash temperature	1-88 %	User information	The criterion encourages users to opt for lower water temperatures and to use lower amount of water.
		Fitness for use	It ensures that the product is fit to wash under realistic conditions
		Information appearing on the EU Ecolabel	It informs consumers that the product's performance has been tested at realistic temperature conditions.
Energy sources to heat up the water	1-88 %	--	Out of the framework of this policy tool
Amount of product used per application	8-98 %	User information	It informs users about the amount of product to be used depending on the washing conditions
		Dosage requirement	This criterion limits the amount of product that manufacturers can recommend to users.
Choice and amount of surfactants	8-98 %	Biodegradability	It ensures that surfactants are biodegradable and will not persist in water.
		Restricted substances	It ensures that hazardous surfactants are not included in the bill of materials.
		Phosphorus content	It ensures that limited and restricted types of phosphorus compounds are not included as ingredients, limiting the eutrophication impacts.
		Sustainable Palm oil	It ensures that renewable palm oil surfactants do not cause unnecessary strain on the ecosystem.
Emissions to water	8-98 %	Toxicity to aquatic organisms	It ensures that ingredients are not toxic to the aquatic organisms
		Biodegradability	It ensures that ingredients are not persistent in the water
		Phosphorus content	It ensures that eutrophication due to phosphorus is limited
		Restricted substances	It ensures that hazardous substances do not reach the water (rivers, sea, oceans, etc.)
		Colorants	It ensures that colorants do not accumulate in the water
		Fragrances	It ensures that only a limited amount of ingredients with sensitizing properties is used
		Enzymes	It ensures that enzymes cannot be inhaled limiting health risks for users
		Information appearing on the EU Ecolabel	It informs consumers that the product contains a limited amount of hazardous substances while they are making purchase decisions.
Waste generation	0-36 %	Packaging	It ensures that a limited amount of waste will be generated and that this waste can be recovered.
		User information	It reminds consumers to dispose the packaging in a responsible manner

Identified hotspots (LCA and non-LCA impacts)	% of total impact⁵	Revised or new EU Ecolabel criteria	Comments on the related criteria
Water consumption	Not rated	User information	It encourages users to follow the instruction to dilute the product
Hazardous substances	Not rated	Hazardous substances and mixtures	This criterion limits the hazardous substances and mixtures that can be included in the product limiting environmental and health risks for consumers.
		Ingoing substances listed in accordance with Article 59(1) of Regulation (EC) No 1907/2006	
		Information appearing on the EU Ecolabel	It informs consumers that the product has a limited amount of hazardous substances at purchasing

3 SUMMARY OF THE FEEDBACK REQUESTED FROM STAKEHOLDERS

All-purpose cleaners and sanitary cleaners		
CRITERION / SECTION	QUESTIONS	
Name, definition and scope	1	Should the product group name be changed from 'all-purpose cleaners and sanitary cleaners' to 'cleaning products'?
	2	Do you agree with the proposed changes for the scope? (undiluted window cleaners and sanitary cleaners, limitation to indoor use for all products, etc.)
	3	Should the definition and scope be changed to cover products that are not mixtures of substances?
	4	Should micro-organisms be considered for inclusion in the EU Ecolabel?
	5	Should any other products be included or excluded from the scope?
Measurement thresholds	1	Are any other changes needed to the assessment and verification requirements and measurement thresholds?
Reference dosage	1	Should the reference dosage take water hardness into consideration?
Toxicity to aquatic organisms	1	More information is required from stakeholders in terms of CDV values for all categories and exact formulations.
	2	Does the 2014 DID list update cause major changes to CDV values?
	3	Are the new proposals for CDV values appropriate?
Biodegradability	1	Is the proposed approach to biodegradability suitable for consumer APC?
	2	What would be the appropriate limits for aNBO and anNBO? Could stakeholders please share with the project team data on the amount of aNBO and anNBO organic substances and mixtures in the product groups covered?
Excluded or limited substances and mixtures	1	Are exclusions of other substances required?
	2	Is it technically feasible to formulate APC products without enzymes classified H400?
	3	Could the % limit for classified surfactants be lower?
Phosphorus	1	Should phosphates be banned from this product category?
	2	Are phosphorus compounds used in this product group?
	3	Do you agree with the proposal to allow phosphonates in professional products?
	4	Should these requirements be merged with criterion 3(a) as in other detergent EU Ecolabel products?
Packaging	1	Packaging is not one of the top 4 KPIs for the product groups concerned, should a criterion related to it be kept?
	2	Are the WUR limits appropriate? Especially for trigger sprays.
	3	Is the design for recycling requirement suitable for this product group?
Fit for use	1	Should evaluation of burnt on soil removal be added as an additional requirement of the testing procedure for kitchen cleaners?
	2	Should the number of repetitions required by the testing procedures be increased to 20, in line with HDDs?
User instructions	1	Is the proposed wording clear and an improvement?
Information appearing on the EU Ecolabel	1	Are the proposed statements suitable, illustrative of claims and an improvement?
Professional training	1	Are product information sheets useful for training purposes?

4 CRITERIA STRUCTURE COMPARISON TABLE

STRUCTURE OF THE CRITERIA	
Current organisation of the EU Ecolabel criteria	Potential changes, modifications or amendments
Criterion 1: Toxicity to aquatic organisms Criterion 2: Biodegradability of organics Criterion 3: Excluded or limited substances and mixtures Criterion 4: Fragrances Criterion 5: Volatile organic compounds Criterion 6: Phosphorus Criterion 7: Packaging requirements Criterion 8: Fitness for use Criterion 9: User instructions Criterion 10: Information appearing on the Ecolabel Criterion 11: Professional training	Criterion 1: Toxicity to aquatic organisms Criterion 2: Biodegradability Criterion 3: Sustainable sourcing of palm oil, palm kernel oil and their derivatives Criterion 4: Excluded or limited substances and mixtures Criterion 4: Volatile organic compounds Criterion 5: Packaging requirements Criterion 6: Fitness for use Criterion 9: User information Criterion 10: Information appearing on the EU Ecolabel
	The proposed changes to the structure reflect the fact that certain criteria are proposed to be merged and an additional criterion is proposed to cover sustainable sourcing of some ingredients.

5 NAME AND DEFINITION COMPARISON TABLE

NAME OF THE EU ECOLABEL	
Current name of the EU Ecolabel	Potential changes, modifications or amendments
All-purpose cleaners and sanitary cleaners	Cleaning products
	The proposed name is shorter and covers all product groups covered by the EU Ecolabel, including window cleaners that are not included in the current name.
DEFINITION OF THE PRODUCT GROUP	
<p>The product group 'All-purpose cleaners and sanitary cleaners' shall comprise: all-purpose cleaners, window cleaners, and sanitary cleaners.</p> <p>(a) All-purpose cleaners comprising detergent products intended for the routine cleaning of floors, walls, ceilings, windows and other fixed surfaces, and which are either diluted in water prior to use or used without dilution. All-purpose cleaners shall mean products intended for indoor use in buildings which include domestic, commercial and industrial facilities.</p> <p>(b) Window cleaners comprising specific cleaners intended for the routine cleaning of windows, and which are used without dilution.</p> <p>(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 and kitchens. This subgroup thus contains bathroom cleaners and kitchen cleaners.</p> <p>The product group shall cover products for both private and professional use. The products shall be mixtures of chemical substances and must not contain micro-organisms that have been deliberately added by the manufacturer.</p>	<p>(Option 1) The product group 'Cleaning Products' shall comprise: all-purpose-cleaners, window cleaners and sanitary cleaners.</p> <p>a) All-purpose cleaners comprising detergent products intended for routine cleaning of hard surfaces such as walls, floors and other fixed surfaces.</p> <p>b) Window cleaners comprising specific detergents intended for the routine cleaning of windows, glass and other highly polished surfaces.</p> <p>c) Sanitary cleaners comprising detergents products intended for the routine removal, including by scouring, of dirt and/or deposits in sanitary facilities, such as laundry rooms, toilets, bathrooms, showers and kitchens. This subgroup contains WC cleaners, bathroom cleaners and kitchen cleaners.</p> <p>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 and must not contain micro-organisms that have been deliberately added by the manufacturer. Wipes containing cleaning agents are not eligible for the EU Ecolabel for cleaning products.</p> <p>(Option 2) The product group 'Cleaning Products' shall comprise: all-purpose-cleaners, window cleaners and sanitary cleaners.</p> <p>d) All-purpose cleaners comprising cleaning products intended for routine cleaning of hard surfaces such as walls, floors and other fixed surfaces.</p>

	<p>e) Window cleaners comprising specific cleaning intended for the routine cleaning of windows, glass and other highly polished surfaces.</p> <p>f) Sanitary cleaners comprising cleaning products intended for the routine removal, including by scouring, of dirt and/or deposits in sanitary facilities, such as laundry rooms, toilets, bathrooms, showers and kitchens. This subgroup contains WC cleaners, bathroom cleaners and kitchen cleaners.</p> <p>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 and must not contain micro-organisms that have been deliberately added by the manufacturer. Wipes containing cleaning agents are not eligible for the EU Ecolabel for cleaning products.</p>
	<p>The proposed changes include several clarifications on product that are included and not included in the scope of the EU Ecolabel (i.e. further clarification was added on window cleaners). The scope is also proposed to be expanded to all ready-to-use and undiluted products that fall under the three categories listed. This change has been proposed by stakeholders as undiluted window cleaners and sanitary cleaners exist on the market and, if used correctly, could have lower environmental impacts than their ready-to-use counterparts.</p> <p>A second option is also proposed for the scope in order to cover two types of products – vinegar and products containing micro-organisms. Further research is required to fully understand the implications of expanding the scope to these product groups.</p>

6 COMPARISON OF EXISTING AND PROPOSED CRITERIA

CRITERIA																	
Existing EU Ecolabel criteria	Potential changes, modifications or amendments																
Criterion 1: Toxicity to aquatic organisms																	
<p>For all-purpose cleaners which are diluted in water prior to use, the CDV_{chronic} shall be calculated on the basis of the dosage in grams of the product recommended by the manufacturer for preparing 1 litre of washing water for cleaning of normally soiled surfaces. The CDV_{chronic} of the recommended dose expressed for 1 litre of washing water shall not exceed 18,000 litres.</p> <p>For all-purpose cleaners which are used without dilution, the CDV_{chronic} for 100 g of the product shall not exceed 52,000 litres.</p> <p>For window cleaners, the CDV_{chronic} for 100 g of the product shall not exceed 4,800 litres.</p> <p>For sanitary cleaners, the CDV_{chronic} for 100 g of the product shall not exceed 80,000 litres.</p> <p>Assessment and verification: the exact formulation of the product shall be provided to the competent body, together with the details of the CDV_{chronic} calculations showing compliance with this Criterion.</p>	<p>The critical dilution volume (CDV) of the product must not exceed the following limits for the reference dosage:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="background-color: #f2f2f2;">Product type</th> <th style="background-color: #f2f2f2;">Limit CDV</th> </tr> </thead> <tbody> <tr> <td>All-purpose cleaners, RTU</td> <td>52 000</td> </tr> <tr> <td>All-purpose cleaners, undiluted</td> <td>12 200</td> </tr> <tr> <td>Window cleaners, RTU</td> <td>4 800</td> </tr> <tr> <td>Window cleaners, undiluted</td> <td>1 200</td> </tr> <tr> <td>Sanitary cleaners, RTU</td> <td>72 000</td> </tr> <tr> <td>Sanitary cleaners, undiluted</td> <td>18 000</td> </tr> <tr> <td>Toilet (WC) cleaners, RTU</td> <td>80 000</td> </tr> </tbody> </table> <p>Assessment and verification: Calculation of the CDV of the product. A spreadsheet for calculation of the CDV value is available on the EU Ecolabel website.</p> <p>The Critical Dilution Volume (CDV) is calculated for all ingoing substances and mixtures (i) in the product using the following equation:</p> $CDV = \sum CDV(i) = 1000 \cdot \sum dosage(i) \cdot \frac{DF(i)}{TF(i)}$ <p>Where:</p> <p><i>dosage(i)</i>: weight (g) of the substance or mixture <i>i</i> in the reference dose,</p> <p><i>DF(i)</i>: degradation factor for the substance or mixture <i>i</i></p> <p><i>TF(i)</i>: toxicity factor for the substance or mixture <i>i</i></p> <p>The values of <i>DF(i)</i> and <i>TF(i)</i> shall be as given in the DID list Part A (Appendix I). If a substance or mixture is not included in the DID list Part A, the applicant shall estimate the values follow the approach described in the DID list Part B (Appendix I).</p>	Product type	Limit CDV	All-purpose cleaners, RTU	52 000	All-purpose cleaners, undiluted	12 200	Window cleaners, RTU	4 800	Window cleaners, undiluted	1 200	Sanitary cleaners, RTU	72 000	Sanitary cleaners, undiluted	18 000	Toilet (WC) cleaners, RTU	80 000
Product type	Limit CDV																
All-purpose cleaners, RTU	52 000																
All-purpose cleaners, undiluted	12 200																
Window cleaners, RTU	4 800																
Window cleaners, undiluted	1 200																
Sanitary cleaners, RTU	72 000																
Sanitary cleaners, undiluted	18 000																
Toilet (WC) cleaners, RTU	80 000																

The proposed changes include the addition of CDV limits for the different types of cleaning products proposed to be covered by the scope. A separate limit is proposed for toilet cleaners as they are a very specific type of sanitary cleaner with CDV values clearly separate from the other product types under the sanitary cleaner sub-category.

Moreover, new limits are proposed in cases where enough data was gathered that shows that the products present on the market have a CDV value well below the current limits.

Criterion 2: Biodegradability of organics

a) Ready biodegradability (aerobic)

Each surfactant used in the product shall be readily biodegradable.

b) Anaerobic biodegradability

Surfactants that are not biodegradable under anaerobic conditions may be used in the product within specified limitations provided that the surfactants are not classified with H400/R50 (Very toxic to aquatic life) within the limit specified below.

For all-purpose cleaners to be diluted with water prior to use, the total weight of anaerobically non-biodegradable surfactants must not exceed 0.40 g of the recommended dose expressed for 1 litre of washing water.

For all-purpose cleaners to be used without dilution, the total weight of anaerobically non-biodegradable surfactants must not exceed 4.0 g per 100 g product.

For sanitary cleaners, the total weight of anaerobically non-biodegradable surfactants must not exceed 2.0 g per 100 g product.

For window cleaners, the total weight of anaerobically non-biodegradable surfactants must not exceed 2.0 g per 100 g product.

Assessment and verification: the exact formulation of the product as well as a description of the function of each substance shall be provided to the competent body. The DID list-Part A (Appendix I) indicates whether a specific surfactant is anaerobically biodegradable or not (the surfactants with an entry of 'Y' in the column on anaerobic biodegradability are biodegradable under anaerobic conditions). For surfactants which are not included in the DID list-Part A, the relevant

a) Biodegradability of surfactants

To be discussed at the 1st AHWG meeting.

All surfactants shall be biodegradable under aerobic conditions.

All surfactants shall be biodegradable under anaerobic conditions.

b) Biodegradability of organic substances and mixtures

To be discussed at the 1st AHWG meeting.

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

Product type	aNBO	anNBO
All-purpose cleaners, RTU	x,xx g	x,xx g
All-purpose cleaners, concentrated	x,xx g	x,xx g
Window cleaners, RTU	x,xx g	x,xx g
Window cleaners, concentrated	x,xx g	x,xx g
Sanitary cleaners, RTU	x,xx g	x,xx g
Sanitary cleaners, Concentrated	x,xx g	x,xx g
WC cleaners, RTU	x,xx g	x,xx g

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

For both surfactants and aNBO and anNBO values, reference shall be made to the

<p>information from literature or other sources, or appropriate test results, showing that they are anaerobically biodegradable shall be provided. The reference test for anaerobic degradability shall be OECD 311, ISO 11734, ECETOC No 28 (June 1988) or an equivalent test method, with the requirement of a minimum of 60 % ultimate degradability under anaerobic conditions. Test methods simulating the conditions in a relevant anaerobic environment may also be used to document that 60 % ultimate degradability has been attained under anaerobic conditions.</p>	<p>DID List. For ingredients 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 Appendix (to be added).</p> <p>In the absence of documentation in accordance with the above requirements, an ingoing substances and mixtures other than a surfactant may be exempted from the requirement for anaerobic degradability if one of the following three alternatives is fulfilled:</p> <ol style="list-style-type: none"> 1. Readily degradable and has low adsorption ($A < 25\%$); 2. Readily degradable and has high desorption ($D > 75\%$); 3. Readily degradable and non-bioaccumulating. <p>Testing for adsorption/desorption may be conducted in accordance with OECD guidelines 106.</p>
	<p>As six EU Ecolabels related to detergents are being revised at the same time and as these products often have similar formulations, it is judicious to consider the harmonisation of their criteria. The current six EU Ecolabel criteria approach the subject using three different approaches and stakeholder consultation has yielded a multitude opinions. It has thus been decided that a discussion during the 1st AHWG meeting will be conducted. As a starting point for the harmonised approach the criterion included in the most recently voted criteria for industrial and institutional products (laundry and dishwasher detergents) is proposed. The criterion will be revised following discussions with stakeholders.</p>
<p>Criterion 3: Excluded or limited substances and mixtures</p>	
<p>a) Specified excluded substances</p> <p>The following ingredients must not be included in the product, either as part of the formulation or as part of any mixture included in the formulation:</p> <ul style="list-style-type: none"> • alkylphenol ethoxylates (APEOs) and derivatives thereof • EDTA (ethylenediaminetetraacetate) • 5-bromo-5-nitro-1,3-dioxane • 2-bromo-2-nitropropane-1,3-diol • diazolinidylurea • formaldehyde 	<p>a) The product shall not be formulated or manufactured using any of the following compounds:</p> <ol style="list-style-type: none"> (i) APEO (alkylphenol ethoxylates) and APD (alkylphenol derivatives) (ii) EDTA (ethylenediaminetetraacetate) (iii) 5-bromo-5-nitro-1,3-dioxane (iv) 2-bromo-2-nitropropane-1,3-diol (v) Diazolinidylurea (vi) Formaldehyde (vii) Sodium hydroxymethylglycinate

<ul style="list-style-type: none"> • sodium hydroxymethylglycinate • nitro-musks and polycyclic musks, including for example: <ul style="list-style-type: none"> ○ Musk xylene: 5-tert-butyl-2,4,6-trinitro-m-xylene ○ Musk ambrette: 4-tert-butyl-3-methoxy-2,6-dinitrotoluene ○ Moskene: 1,1,3,3,5-pentamethyl-4,6-dinitroindan ○ Musk tibetine: 1-tert-butyl-3,4,5-trimethyl-2,6-dinitrobenzene ○ Musk ketone: 4'-tert-butyl-2',6'-dimethyl-3',5'-dinitroacetaphenone ○ HHCB (1,3,4,6,7,8-hexahydro-4,6,6,7,8,8-hexamethylcyclopenta(g)-2-benzopyran) ○ AHTN (6-acetyl-1,1,2,4,4,7-hexamethyltetralin). <p>Assessment and verification: the applicant shall provide a declaration supported by declarations from manufacturers of substances, as appropriate, confirming that the listed substances have not been included in the product.</p>	<ul style="list-style-type: none"> (viii) Nitro-musks and polycyclic musks (ix) Hydroxyisohexyl 3-cyclohexene carboxaldehyde (HICC) (x) Atranol and Chloroatranol (xi) Quaternary ammonium salts that are not readily biodegradable (xii) Fragrance substances subject to the declaration requirement provided for in Regulation (EC) No 648/2004 of the European Parliament and of the Council on detergents (Annex VII) and which are not already excluded by criterion 2b shall not be present in quantities $\geq 0.010\%$ (≥ 100 ppm) per substance. (xiii) Phosphates or phosphorus compounds shall not be included in the product, neither as part of the formulation nor as part of any mixture included in the formulation. <p>Assessment and verification: the applicant shall provide a declaration supported by declarations from manufacturers of substances, as appropriate, confirming that the listed substances have not been included in the product.</p> <p>The applicant shall provide documentation showing the biodegradability of any quaternary ammonium salt used.</p> <p>The applicant shall also provide a declaration from the fragrance manufacturer specifying the content of each of the substances in the fragrances which are listed in Annex III of the Regulation (EC) No 1223/2009.</p>
<p>b) Quaternary ammonium salts</p> <p>Quaternary ammonium salts that are not readily biodegradable shall not be used, either as part of the formulation or as part of any mixture included in the formulation.</p> <p>Assessment and verification: the applicant shall provide documentation showing the biodegradability of any quaternary ammonium salt used.</p>	<p>(moved to 3a)</p>
<p>c) Hazardous substances and mixtures</p> <p>According to the Article 6(6) of Regulation (EC) No 66/2010, the product or any part of it shall not contain substances (in any forms, including nanoforms) meeting criteria for classification with the hazard statements or risk phrases specified below in accordance with Regulation (EC) No 1272/2008 of the European Parliament and of the Council (1) or Council Directive 67/548/EEC (2) nor shall it contain substances referred to in Article 57 of Regulation (EC) No 1907/2006 of the European</p>	<p>b) According to Article 6(6) of Regulation (EC) No 66/2010, the EU Ecolabel may not be awarded to any product that contains substances meeting criteria for classification with the hazard statements specified in Table 2 in accordance with Regulation (EC) No 1272/2008 of the European Parliament and of the Council or substances referred to in Article 57 of Regulation (EC) No 1907/2006. The hazard statements in Table 2 generally refer to substances. However, if information on substances cannot be obtained, the classification rules for mixtures apply.</p>

Parliament and of the Council (3). The risk phrases below generally refer to substances. However, for mixtures of enzymes and fragrances, where information on substances cannot be obtained, the classification rules for mixtures shall be applied.

List of hazard statements:

GHS Hazard Statement	EU Risk Phrase
H300 Fatal if swallowed	R28
H301 Toxic if swallowed	R25
H304 May be fatal if swallowed and enters airways	R65
H310 Fatal in contact with skin	R27
H311 Toxic in contact with skin	R24
H330 Fatal if inhaled	R23/26
H331 Toxic if inhaled	R23
H340 May cause genetic defects	R46
H341 Suspected of causing genetic defects	R68
H350 May cause cancer	R45
H350i May cause cancer by inhalation	R49
H351 Suspected of causing cancer	R40
H360F May damage fertility	R60
H360D May damage the unborn child	R61
H360FD May damage fertility. May damage the unborn child	R60-61
H360Fd May damage fertility. Suspected of damaging the unborn child	R60-63
H360Df May damage the unborn child. Suspected of damaging fertility	R61-62
H361f Suspected of damaging fertility	R62
H361d Suspected of damaging the unborn child	R63
H361fd Suspected of damaging fertility. Suspected of damaging the unborn child.	R62-63
H362 May cause harm to breast fed children	R64
H370 Causes damage to organs	R39/23; R39/24; R39/25; R39/26; R39/27; R39/28
H371 May cause damage to organs	R68/20; R68/21; R68/22

Substances or mixtures which change their properties through processing and thus become no longer bioavailable, or undergo chemical modification in a way that removes the previously identified hazard are exempted from criterion 3(b).

Table 2: Hazard statements

GHS Hazard Statement
H300 Fatal if swallowed
H301 Toxic if swallowed
H304 May be fatal if swallowed and enters airways
H310 Fatal in contact with skin
H311 Toxic in contact with skin
H330 Fatal if inhaled
H331 Toxic if inhaled
H340 May cause genetic defects
H341 Suspected of causing genetic defects
H350 May cause cancer
H350i May cause cancer by inhalation
H351 Suspected of causing cancer
H360F May damage fertility
H360D May damage the unborn child
H360FD May damage fertility. May damage the unborn child
H360Fd May damage fertility. Suspected of damaging the unborn child
H360Df May damage the unborn child. Suspected of damaging fertility
H361f Suspected of damaging fertility
H361d Suspected of damaging the unborn child
H361fd Suspected of damaging fertility. Suspected of damaging the unborn child.
H362 May cause harm to breast fed children
H370 Causes damage to organs
H371 May cause damage to organs
H372 Causes damage to organs through prolonged or repeated exposure
H373 May cause damage to organs through prolonged or repeated exposure
H400 Very toxic to aquatic life
H410 Very toxic to aquatic life with long-lasting effects
H411 Toxic to aquatic life with long-lasting effects

H372 Causes damage to organs through prolonged or repeated exposure	R48/25; R48/24; R48/23
H373 May cause damage to organs through prolonged or repeated exposure	R48/20; R48/21; R48/22
H400 Very toxic to aquatic life	R50
H410 Very toxic to aquatic life with long-lasting effects	R50-53
H411 Toxic to aquatic life with long-lasting effects	R51-53
H412 Harmful to aquatic life with long-lasting effects	R52-53
H413 May cause long-lasting harmful effects to aquatic life	R53
EUH059 Hazardous to the ozone layer	R59
EUH029 Contact with water liberates toxic gas	R29
EUH031 Contact with acids liberates toxic gas	R31
EUH032 Contact with acids liberates very toxic gas	R32
EUH070 Toxic by eye contact	R39-41
Sensitising substances	
H334: May cause allergy or asthma symptoms or breathing difficulties if inhaled	R42
H317: May cause allergic skin reaction	R43

Substances or mixtures which change their properties upon processing (e.g. become no longer bioavailable, undergo chemical modification) so that the identified hazard no longer applies are exempted from the above requirement.

Derogations: the following substances or mixtures are specifically exempted from this requirement:

Surfactants in concentrations <25 % in the product (*)	H400 Very toxic to aquatic life	R50
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H412 Harmful to aquatic life with long-lasting effects
H413 May cause long-lasting harmful effects to aquatic life
EUH059 Hazardous to the ozone layer
EUH029 Contact with water liberates toxic gas
EUH031 Contact with acids liberates toxic gas
EUH032 Contact with acids liberates very toxic gas
EUH070 Toxic by eye contact
H334: May cause allergy or asthma symptoms or breathing difficulties if inhaled
H317: May cause allergic skin reaction

This criterion applies to all ingredients present in concentrations $\geq 0.01\%$, including preservatives, colouring agents and fragrances.

For consumer cleaning products, the substances in Table 3 are exempted from the obligation in Article 6(6) of Regulation (EC) No 66/2010 following application of Article 6(7) of the same Regulation.

[Table 3: Derogated substances - To be discussed in the 1st AHWG meeting](#)

Assessment and verification: the applicant shall demonstrate compliance with criterion x (b) for any ingoing substance or mixture present at concentrations greater than 0,010% in the product.

A declaration of compliance shall be provided by the applicant supported, where appropriate, by the declarations from producer(s) of the raw materials that none of these ingoing substances and/or mixtures meet the criteria for classification with one or more of hazard statements listed in Table 2 in the form(s) and physical state(s) they are present in the product.

The following technical information related to the form(s) and physical state(s) of the ingoing substances and/or mixtures as present in the product shall be provided to support the declaration of non-classification:

(i) For substances that have not been registered under Regulation (EC) No 1907/2006 and/or which do not yet have a harmonised CLP classification: Information meeting the requirements listed in Annex VII to that Regulation;

(ii) For substances that have been registered under Regulation (EC) No 1907/2006 and which do not meet the requirements for CLP classification: Information based

Surfactants in concentrations <25 % in the product(**)	H412 Harmful to aquatic life with long-lasting effects	R52-53
Fragrances	H412 Harmful to aquatic life with long-lasting effects	R52-53
Enzymes(***)	H317: May cause allergic skin reaction H334: May cause allergy or asthma symptoms or breathing difficulties if inhaled	R43 R42
NTA as an impurity in MGDA and GLDA(****)	H351 suspected of causing cancer	R40

(*) The percentage must be divided by the M-factor established in accordance with the Regulation (EC) No 1272/2008.

(**) This derogation is applicable provided that they are ready degradable and anaerobically degradable.

(***) Including stabilisers and other auxiliary substances in the preparations.

(****) In concentrations lower than 1.0 % in the raw material as long as the total concentration in the final product is lower than 0.10 %.

Assessment and verification: the applicant shall provide the exact formulation of the product to the competent body. The applicant shall demonstrate compliance with this Criterion for substances in the product on the basis of information consisting as a minimum of that specified in Annex VII to the Regulation (EC) No 1907/2006. Such information shall be specific to the particular form of the substance, including nanoforms, used in the product. For that purpose, the applicant shall provide a declaration of compliance with this Criterion, together with a list of ingredients and related Safety Data Sheets in accordance with Annex II to Regulation (EC) No 1907/2006 for the product as well as for all substances listed in the formulation(s). Concentration limits shall be specified in the Safety Data Sheets in accordance with Article 31 of Regulation (EC) No 1907/2006.

d) Substances listed in accordance with Article 59(1) of Regulation (EC) No 1907/2006

No derogation from the exclusion in Article 6(6) shall be given concerning substances identified as substances of very high concern and included in the list foreseen in Article 59 of Regulation (EC) No 1907/2006 present in mixtures

on the REACH registration dossier confirming the non-classified status of the substance;

(iii) For substances that have a harmonised classification or are self-classified: safety data sheets where available. If these are not available or the substance is self-classified then information shall be provided relevant to the substances hazard classification according to Annex II to Regulation (EC) No 1907/2006;

(iv) In the case of mixtures: safety data sheets where available. If these are not available then calculation of the mixture classification shall be provided according to the rules under Regulation (EC) No 1272/2008 together with information relevant to the mixtures hazard classification according to Annex II to Regulation (EC) No 1907/2006.

For substances listed in Annexes IV and V to Regulation (EC) No 1907/2006, which are exempted from registration obligations under point (a) and (b) of Article 2(7) of that Regulation, a declaration to this effect by the applicant shall suffice to comply with criterion 3(b).

A declaration on the presence of ingoing substances that fulfil the derogation conditions shall be provided by the applicant, supported, where appropriate, by declarations from the producer(s) of the raw materials. Where required for the derogation, the applicant shall confirm the concentrations of these ingoing substances in the final product.

c) Substances listed in accordance with Article 59(1) of Regulation (EC) No 1907/2006

No derogation from the exclusion in Article 6(6) shall be given concerning substances identified as substances of very high concern and included in the list foreseen in Article 59 of Regulation (EC) No 1907/2006 present in

<p>in concentrations higher than 0.010 %.</p> <p>Assessment and verification: the list of substances identified as substances of very high concern and included in the candidate list in accordance with Article 59 of Regulation (EC) No 1907/2006 can be found here: http://echa.europa.eu/chem_data/authorisation_process/candidate_list_table_en.asp</p> <p>Reference to the list shall be made on the date of application.</p> <p>Concentration limits shall be specified in the safety data sheets in accordance with Article 31 of Regulation (EC) No 1907/2006.</p>	<p>mixtures in concentrations higher than 0.010 %.</p> <p>Assessment and verification: the list of substances identified as substances of very high concern and included in the candidate list in accordance with Article 59 of Regulation (EC) No 1907/2006 can be found here: http://echa.europa.eu/chem_data/authorisation_process/candidate_list_table_en.asp</p> <p>Reference to the list shall be made on the date of application.</p> <p>Concentration limits shall be specified in the safety data sheets in accordance with Article 31 of Regulation (EC) No 1907/2006.</p>
<p>e) Biocides</p> <ul style="list-style-type: none"> (i) The product may only include biocides in order to preserve the product, and in the appropriate dosage for this purpose alone. This does not refer to surfactants, which may also have biocidal properties (ii) It is prohibited to claim or suggest on the packaging or by any other communication that the product has an antimicrobial action (iii) Biocides, either as part of the formulation or as part of any mixture included in the formulation, that are used to preserve the product and that are classified H410/R50-53 or H411/R51-53 in accordance with Directive 67/548/EEC, Directive 1999/45/EC of the European Parliament and of the Council (1) or Regulation (EC) No 1272/2008, are permitted but only if their bioaccumulation potentials are characterised by log Kow (log octanol/water partition coefficient) < 3.0 or an experimentally determined bioconcentration factor (BCF) ≤ 100. <p>Assessment and verification: the applicant shall provide copies of the material safety data sheets for all biocides, together with a documentation of the concentrations of the biocides in the final product.</p>	<p>d) Biocides</p> <ul style="list-style-type: none"> (i) The product may contain preservatives provided that they are not bioaccumulating. A preservative is not considered bioaccumulating if BCF < 100 or logPow < 3,0. If both BCF and log Kow values are available, the highest measured BCF value shall be used. (ii) Preservatives in the product shall not release or degrade to substances that are classified in accordance with the requirements of Criterion x(b) on hazardous substances and mixtures. (iii) It is prohibited to claim or suggest on the packaging or by any other communication that the product has an antimicrobial action. <p>Assessment and verification: the applicant 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.</p>
	<p>The proposed changes mainly aim to consolidate the list of excluded substances as it can be found right now. As fragrances are proposed to no longer be treated in a separate criterion, the excluded fragrances are included in the list. Stakeholder feedback indicated that quaternary ammonium salts are still an issue in detergents, and thus all non-readily biodegradable quaternary ammonium salts are on the list of excluded substances.</p>

	<p>It is also proposed to remove the requirement for biocides to only be included for preservation purposes as it is impossible for competent bodies to verify the compliance with this type of requirement. It is also proposed to consider the substances that are released as biocides degrade.</p>
	<p>(f) Colorants</p> <p>Colorants in the product must not be bioaccumulating. A colorant is considered not bioaccumulating if $BCF < 100$ or $\log P_{ow} < 3,0$. If both BCF and $\log K_{ow}$ 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 bioaccumulation potential.</p> <p>Assessment and verification: the applicant shall provide copies of the safety data sheets of any colorant added together with information on its BCF and/or $\log K_{ow}$ value, or documentation to ensure that the colouring agent is approved for use in food.</p>
	<p>(g) Enzymes</p> <p>Enzymes shall be in liquid form or dust-free granulate. Enzymes must be free from micro-organism remnants from manufacture.</p> <p>Assessment and verification: the applicant shall provide copies of the material safety data sheets of any enzyme added, together with documentation to ensure that the enzyme is free from micro-organism remnants.</p>
	<p>The proposed changes aim at harmonising the requirements on detergent ingredients, here colorants and enzymes, across the six detergent product groups. The requirement for colorants not to be bioaccumulating is in line with the requirement included for ROCs. Further, the use of enzymes is increasing and they should not render the product unsafe for users.</p>
Criterion 4: Fragrances	
<p>a) The product shall not contain perfumes containing nitro-musks or polycyclic musks (as specified in Criterion 3 (a)).</p> <p>b) Any substance added to the product as a fragrance must have been manufactured and/or handled in accordance with the code of practice of the International Fragrance Association. The code can be found on IFRA website:</p>	<p>Criterion 3(e): Fragrances</p> <p>Any ingoing substance or mixture added to the product as a fragrance shall be manufactured and handled following the code of practice of the International Fragrance Association (IFRA). The code can be found on the IFRA website: http://www.ifraorg.org. The recommendations of the IFRA Standards concerning</p>

<http://www.ifraorg.org>

- c) Fragrance substances subject to the declaration requirement provided for in Regulation (EC) No 648/2004 (Annex VII) and which are not already excluded by Criterion 3(c) and (other) fragrance substances classified H317/R43 (May cause allergic skin reaction) and/or H334/R42 (May cause allergy or asthma symptoms or breathing difficulties if inhaled) shall not be present in quantities $\geq 0.010\%$ (≥ 100 ppm) per substance.

Assessment and verification: the applicant shall provide a declaration of compliance with each part of Criteria (a) and (b). For Criterion (c), the applicant shall provide a signed declaration of compliance indicating the amount of fragrances in the product. The applicant shall also provide a declaration from the fragrance manufacturer specifying the content of each of the substances in the fragrances which are listed in Annex III, Part I to Council Directive 76/768/EEC (12) as well as the content of (other) substances which have been assigned the risk phrases R43/H317 and/or R42/H334.

prohibition, restricted use and specified purity criteria for materials shall be followed by the manufacturer.

Assessment and verification: the applicant shall provide a signed declaration of compliance, supported by a declaration of the fragrance manufacturer, as appropriate.

It is proposed to move the requirements related to fragrances from Criterion 4 to Criterion 3(e). No content-wise modifications are proposed.

Criterion 5: Volatile organic compounds

The final products of all-purpose cleaners and sanitary cleaners (as sold) shall not contain more than 6 % (by weight) of volatile organic compounds with a boiling point lower than 150 °C. Alternatively, for concentrated products to be diluted in water, the total concentration of volatile organic compounds with a boiling point lower than 150 °C shall not exceed 0.2 % (by weight) in the washing water.

The final products of window cleaners (as sold) shall not contain more than 10 % (by weight) of volatile organic compounds with a boiling point lower than 150 °C.

Assessment and verification: the applicant shall provide copies of the material safety data sheets of each organic solvent together with details of the calculations of the total concentration of volatile organic compounds with a boiling point lower than 150 °C.

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

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

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

	The proposed changes for this criterion include an updated definition of VOCs. Values are also proposed for the new product groups covered by the proposed expanded scope of the EU Ecolabel.
Criterion 6: Phosphorus	
<p>The total quantity of elemental phosphorous in the product shall be calculated on the basis of the dosage of the product recommended by the manufacturer for preparing 1 litre of washing water for cleaning of normally soiled surfaces (for products diluted in water prior to use) or per 100 g of product (for products used without dilution) taking into account all substances containing phosphorus (e.g. phosphates and phosphonates).</p> <p>For all-purpose cleaners, which are diluted in water prior to use, the total phosphorus content (P) shall not exceed 0.02 g of the dosage of the product recommended by the manufacturer for 1 litre of washing water.</p> <p>For all-purpose cleaners, which are used without dilution, the total phosphorus content (P) shall not exceed 0.2 g per 100 g of product.</p> <p>For sanitary cleaners, the total phosphorus content (P) shall not exceed 1.0 g per 100 g of product.</p> <p>Substances used in window cleaners must not contain phosphorus.</p> <p>Assessment and verification: the applicant shall provide the exact formulation of the product to the competent body, together with the details of the calculations showing compliance with this Criterion.</p>	<p>Criterion X(h) – Phosphorus content</p> <p>Phosphonates may be included in products intended for professional use but not exceeding concentrations on 0,5% by weight.</p> <p>Assessment and verification: the applicant shall provide the exact formulation of the product to the competent body, together with the details of the calculations showing compliance with this Criterion.</p>
	Stricter limits on phosphorus content is proposed as phosphorus-free products already exist on the market and phosphorus plays a smaller role in the types of cleaning products covered this EU Ecolabel (that means all-purpose cleaners, sanitary and kitchen cleaners and window cleaners) than in laundry and dishwasher detergents.
Criterion 7: Packaging requirements	
<p>a) Sprays containing propellants must not be used.</p> <p>b) Plastic materials that are used for the main container shall be marked in accordance with the European Parliament and Council Directive 94/62/EC of 20 December 1994 on packaging and packaging waste (1), or DIN 6120 Parts 1 and 2 in connection with DIN 7728 Part 1.</p>	<p>a) <i>Products sold in spray bottles</i></p> <p>Sprays containing propellants must not be used. Products packaged in trigger sprays must be sold as a part of a refillable system.</p> <p>Assessment and verification: the applicant or retailer shall document that refills shall be</p>

- c) If the primary packaging is made of recycled material, any indication of this on the packaging shall be in conformity with the ISO 14021 standard 'Environmental labels and declarations – Self declared claims (type II environmental Labelling).
- d) Products packaged in trigger sprays must be sold as a part of a refillable system.
- e) Only phthalates that at the time of applications have been risk assessed and have not been classified according to criterion 3(c) may be used in the plastic packaging.
- f) The weight utility ratio (WUR) of the primary packaging must not exceed the following values:

Product type	WUR
Concentrated products, including liquid concentrates and solids, that are diluted in water prior to use	1.20 gram packaging per litre use solution (washing water)
Ready-to-use products, i.e. products used without further dilution	150 gram packaging per litre use solution (washing water)

Assessment and verification: the applicant shall provide a calculation of the WUR of the product to the competent body, together with a declaration of compliance with each part of this Criterion. For Criterion (e) the applicant shall provide completed and signed declaration of compliance.

available for purchase on the market.

b) Weight/utility ratio (WUR)

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
Undiluted products	1,2 g
RTU products	15,0 g
RTU products sold in bottles with trigger sprays	20,0 g

Are exempted from this requirement:

- Plastic/paper/cardboard packaging containing more than 80 % recycled materials,
- Paper/cardboard packaging that comes 80% from certified sustainable sources,
- Plastic packaging containing more than 80 % plastic from sustainable sources.

Assessment and verification: the applicant shall provide the calculation of the WUR of the product. A spreadsheet for this calculation is available on the EU Ecolabel website. 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.

The applicant shall provide a completed and signed declaration for the content of recycled material in the packaging.

- For paper and cardboard, 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.

- For plastic, packaging is regarded as recycled if the raw material used to make the packaging comes from industrial waste or has been collected from packaging manufacturer at the distribution or at the consumer stage.

The applicant shall provide a completed and signed declaration for the content of sustainably sourced material in the packaging. For paper and cardboard, the applicant shall provide TBD. For plastic, the applicant shall provide TBD.

The WUR is calculated as follows:

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

Where:

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

U_i : weight (g) of non-recycled and non-sustainably sourced 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.

c) Design for recycling

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 4. Pumps are exempted from this requirement.

Table 4: Materials and components excluded from packaging elements

Packaging element	Excluded materials and components ⁴
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)

⁴ EVA – Ethylene Vinyl Acetate, EVOH – Ethylene vinyl alcohol, HDPE – High-density polyethylene, PET – Polyethylene terephthalate, PETG – Polyethylene terephthalate glycol-modified, PP – Polypropylene, PS – Polystyrene, PVC – Polyvinylchloride

	<table border="1"> <tr> <td data-bbox="1099 188 1317 539">Closure</td> <td data-bbox="1317 188 2031 539"> <ul style="list-style-type: none"> - PS closure in combination 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 </td> </tr> <tr> <td data-bbox="1099 539 1317 603">Barrier coatings</td> <td data-bbox="1317 539 2031 603">Polyamide, EVOH, functional polyolefins, metallised and light blocking barriers</td> </tr> </table> <p>Assessment and verification: The applicant shall submit a signed declaration of compliance specifying the material composition of the packaging including the container, label or sleeve, adhesives, closure and barrier coating, and a sample of primary packaging.</p>	Closure	<ul style="list-style-type: none"> - PS closure in combination 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
Closure	<ul style="list-style-type: none"> - PS closure in combination 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				
	<p>The proposed changes mainly concern the differentiation of packaging containing trigger sprays and other RTU packaging. This change has been requested as the current limits greatly reduced the number of products that could seek an EU Ecolabel.</p> <p>Sustainably sourced raw materials are also proposed to be further promoted through WUR reductions. The recyclability of packaging is also proposed to be promoted by limiting combinations of materials that can hinder the recycling process.</p>				
Criterion 8: Fitness for use					
<p>The product shall be fit for use, meeting the needs of the consumers.</p> <p>a) All-purpose cleaners and window cleaners</p> <p>For all-purpose cleaners, only fat-removing effects must be documented. For window cleaners, stripe-less drying must be documented</p> <p>The cleaning ability must be equivalent to or better than that of a market-leading or generic reference product, approved by a competent body. .</p> <p>Assessment and verification: the performance of the product must either be tested by:</p> <ul style="list-style-type: none"> • an adequate and justifiable laboratory test, or 	<p>The product shall be fit for use, meeting the needs of the consumers.</p> <p>a) All-purpose cleaners and window cleaners</p> <p>For all-purpose cleaners, only fat-removing effects must be documented. For window cleaners, stripe-less drying must be documented.</p> <p>The cleaning ability must be equivalent to or better than that of a market-leading or generic reference product, approved by a competent body.</p> <p>Assessment and verification: the performance of the product must either be tested by:</p> <ul style="list-style-type: none"> • an adequate and justifiable laboratory test, or 				

<ul style="list-style-type: none"> • an adequate and justifiable consumer test. <p>Both tests 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/ecolabelled_products/categories/purpose_cleaners_en.htm</p> <p>b) Sanitary cleaners</p> <p>Sanitary cleaners include bathroom cleaners, toilet cleaners and kitchen cleaners. For bathroom cleaners, both limesoap and limescale removal shall be documented. For acidic toilet cleaners, only limescale removal shall be documented. For kitchen cleaners fat removing effects shall be documented.</p> <p>The cleaning ability must be equivalent to or better than that of generic reference detergent specified below.</p> <p>Assessment and verification: the performance of the product must either be tested by:</p> <ul style="list-style-type: none"> • an adequate and justifiable laboratory test, or • an adequate and justifiable consumer test. <p>Both tests 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’. The generic reference detergent 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). The reference detergent is applicable for toilet cleaners and bathroom cleaners; however the pH must be reduced to 3.5 for the testing of bathroom cleaners.</p> <p>The IKW performance test ‘Recommendation for the quality assessment of acidic toilet cleaners’ (SÖFW-Journal, 126, 11, pp. 50-56, 2000) can be downloaded from http://www.ikw.org/pdf/broschueren/EQ_WC_Reiniger_Englisch.pdf</p>	<ul style="list-style-type: none"> • an adequate and justifiable consumer test. <p>Both tests 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</p> <p>b) Sanitary cleaners</p> <p>Sanitary cleaners include bathroom cleaners, toilet cleaners and kitchen cleaners. For bathroom cleaners, both limesoap and limescale removal shall be documented. For acidic toilet cleaners, only limescale removal shall be documented. For kitchen cleaners fat removing effects and evaluation of burnt-on soil removal shall be documented.</p> <p>The cleaning ability must be equivalent to or better than that of generic reference detergent specified below.</p> <p>Assessment and verification: the performance of the product must either be tested by:</p> <ul style="list-style-type: none"> • an adequate and justifiable laboratory test, or • an adequate and justifiable consumer test. <p>Both tests 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’. The generic reference detergent 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). The reference detergent is applicable for toilet cleaners and bathroom cleaners; however the pH must be reduced to 3.5 for the testing of bathroom cleaners.</p> <p>The IKW performance test ‘Recommendation for the quality assessment of acidic toilet cleaners’ (SÖFW-Journal, 126, 11, pp. 50-56, 2000) can be downloaded from http://www.ikw.org/fileadmin/content/downloads/Haushaltspflege/HP_EQ-WC-Reiniger-Englisch.pdf</p>
	<p>In the current revision, no significant changes are proposed to this criterion. A new requirement is proposed for kitchen cleaners concerning the removal of burnt-on soils.</p>
Criterion 9: User instructions	
<p>a) Dosage instructions</p> <p>Information on the recommended dosage of all-purpose cleaners and sanitary</p>	<p>The detergent shall be accompanied by instructions for proper use so as to maximise product performance and minimise waste. These instructions shall be</p>

<p>cleaners shall appear on the packaging in a reasonably sufficient size and against a visible background. In the case of a concentrated product, it shall be clearly indicated on the packaging that only a small quantity of the product is needed compared to normal (i.e. diluted) products.</p> <p>The following text (or equivalent text) shall appear on the packaging: <i>‘Proper dosage saves costs and minimises environmental impacts’</i>.</p> <p>The following text (or equivalent text) shall appear on the packaging of ready-to-use all-purpose cleaners: <i>‘The product is not intended for large-scale cleaning’</i>.</p> <p>b) Safety advice</p> <p>The following safety advice (or equivalent) shall appear on the product in text or as pictogram:</p> <ul style="list-style-type: none"> • ‘Keep away from children’, • ‘Do not mix different cleaners’, • ‘Avoid inhaling sprayed product’ (only for products that are packaged as sprays). <p>Assessment and verification: the applicant shall provide a sample of the product packaging, including the label to the competent body, together with a declaration of compliance with each part of this Criterion</p>	<p>legible or include graphical representation or icons and include information on:</p> <p>a) dosing instructions</p> <p>The primary packaging shall include information on the recommended dosage and dilution instructions:</p> <p>-For ready-to-use products: in ml or other relevant and well-known metric per application. The following text (or equivalent) shall appear on the packaging of ready-to-use products: <i>‘The product is intended only for small or limited cleaning tasks. For extensive cleaning operations use a concentrated formulation.’</i></p> <p>-For undiluted products: in ml or other relevant and well-known metric per application, with instructions on dilution volumes.</p> <p>The following text (or equivalent text) shall appear on packaging for all products: <i>“Proper dosage saves costs and minimises environmental impacts”</i>.</p> <p>b) safety advice</p> <p>The following safety advice (or equivalent) shall appear on the product in text or as pictogram:</p> <ul style="list-style-type: none"> – ‘Keep away from children’, – ‘Do not mix different cleaners’, – ‘Avoid inhaling sprayed product’ (only for products that are packaged as sprays). <p>c) resource saving measures</p> <p>An indication on the primary packaging shall encourage users to use cold tap water, if applicable.</p> <p>d) packaging disposal information</p> <p>The primary packaging shall include information on the reuse, recycling and/or correct disposal of packaging.</p> <p>e) environmental information (voluntary)</p> <p>The following text is recommended to appear on the primary packaging but its use is voluntary:</p> <p><i>“All detergents have an effect on the environment. Always use the correct dose for maximum effectiveness, the lowest recommended temperature. This will minimize both energy and water consumption and reduce water pollution”</i>.</p> <p>Assessment and verification: The applicant shall provide a sample of the product packaging, including the label.</p>
	<p>The proposed changes include clarified indications on the dosage, as well as proposals for indications related to packaging and other environmental</p>

	information. .
Criterion 10: Information appearing on the Ecolabel	
<p>Optional label with text box shall contain the following text:</p> <p>‘— reduced impact on aquatic life, — reduced use of hazardous substances, — reduced packaging waste, — clear user instructions.’</p> <p>The guidelines for the use of the optional label with text box can be found in the ‘Guidelines for the use of the EU Ecolabel logo’ on the website: http://ec.europa.eu/environment/ecolabel/promo/logos_en.htm</p> <p>Assessment and verification: the applicant shall provide a sample of the label, together with a declaration of compliance with this Criterion.</p>	<p>The logo should be visible and legible. The use of the EU Ecolabel logo is protected in primary EU law. The EU Ecolabel registration/licence number must appear on the product, it must be legible and clearly visible.</p> <p>The optional label with text box shall contain the following text:</p> <ul style="list-style-type: none"> • reduced impact on aquatic ecosystems • limited hazardous substances • performance tested <p>Assessment and verification: The applicant shall provide a sample of the product packaging, including the label.</p>
	The proposed change aims at bringing the wording in line with other EU Ecolabel detergents and the information that the EU logo claims.
Criterion 11: Professional training	
<p>For detergents, which are used by professional users, the producer, its distributor or a third party shall offer training or training materials for cleaning staff. These shall include step-by-step instructions for proper dilution, use, disposal and the use of equipment.</p> <p>Assessment and verification: a sample of training material containing step-by-step instructions for proper dilution, use, disposal and the use of equipment and a description of training courses shall be provided to the competent body.</p>	<p>a) Alternative 1 (to be discussed during the first AHWG meeting)</p> <p>For detergents, which are used by professional users, the producer, its distributor or a third party shall offer training or training materials for cleaning staff. These shall include step-by-step instructions for proper dilution, use, disposal and the use of equipment. The producer shall also provide product information sheets for users.</p> <p>Assessment and verification: a sample of training material containing step-by-step instructions for proper dilution, use, disposal and the use of equipment and a description of training courses shall be provided to the competent body.</p> <p>b) Alternative 2 (to be discussed during the 1st AHWG meeting) to withdraw the criterion</p>
	No significant changes are proposed for this criterion in the first alternative. The inclusion of a requirement for product information sheets for users is proposed for discussion.

	<p>The exclusion of the criterion is proposed as second alternative as it does not bring any additional environmental benefit to the product itself and the training will be considered in other policy tools such as EU Ecolabel for cleaning services or GPP for cleaning services.</p>
<p>Criterion NEW: Sustainable sourcing of palm oil, palm kernel oil and their derivatives</p>	
	<p>Ingredients used in the product which are derived from palm oil or palm kernel oil must be sourced from plantations that meet the criteria for sustainable management that have been developed by multi-stakeholder organisations who have a broad based membership including NGOs, industry and government.</p> <p>Assessment and verification: the applicant shall provide third-party certifications that the palm oil used in the manufacturing of the product originates from sustainable managed plantations. Certifications accepted shall include RSPO (by identified preserved, segregates or mass balance) or any equivalent scheme based on multi-stakeholder sustainable management criteria. For chemical derivatives of palm oil it is acceptable to demonstrate sustainability for these through book and claim systems such as GreenPalm or equivalent.</p>

7 REVISION OF MAIN DECISION TEXT

7.1 Name, definition and scope for EU Ecolabel

Current definition and scope:

The product group 'All-purpose cleaners and sanitary cleaners' shall comprise: all-purpose cleaners, window cleaners, and sanitary cleaners.

- (a) All-purpose cleaners comprising detergent products intended for the routine cleaning of floors, walls, ceilings, windows and other fixed surfaces, and which are either diluted in water prior to use or used without dilution. All-purpose cleaners shall mean products intended for indoor use in buildings which include domestic, commercial and industrial facilities.
- (b) Window cleaners comprising specific cleaners intended for the routine cleaning of windows, and which are used without dilution.
- (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 and kitchens. This subgroup thus contains bathroom cleaners and kitchen cleaners.

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

Proposal for new definition and scope

The product group '[Cleaning Products](#)' shall comprise: all-purpose-cleaners, window cleaners and sanitary cleaners.

- a) All-purpose cleaners comprising detergent products intended for routine cleaning of hard surfaces such as walls, floors and other fixed surfaces.
- b) Window cleaners comprising specific detergents intended for the routine cleaning of windows, [glass and other highly polished surfaces](#).
- c) Sanitary cleaners comprising detergents products intended for the routine removal, including by scouring, of dirt and/or deposits in sanitary facilities, such as laundry rooms, toilets, bathrooms, showers and kitchens. This subgroup contains WC cleaners, bathroom cleaners and kitchen cleaners.

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 and must not contain micro-organisms that have been deliberately added by the manufacturer. [Wipes containing cleaning agents are not eligible for the EU Ecolabel for cleaning products](#).

Rationale and discussion

Regarding the **name** of the EU Ecolabel for "all-purpose cleaners and sanitary cleaners", a revision seems appropriate as:

- the current name of the EU Ecolabel, "*all-purpose cleaners and sanitary cleaners*", does not encompass all the products that are listed in the definition – namely window cleaners,
- colloquially the EU Ecolabel is referred to as "*all-purpose cleaners*" leading to confusion as to whether one is referring to all the product groups covered (all-purpose cleaners, window cleaners, sanitary cleaners) or just the sub-category dedicated to all-purpose cleaners.

Thus, it is recommended that the name of the product group or the name of the sub-group is changed. In the first case, the product group could be called "cleaning products", while in the second the name of those detergents that are intended to be used for cleaning fixed surfaces could be changed to "general purpose cleaners" or "multi-purpose cleaners".

In this revision it is proposed to change the name of the product group. The name "all-purpose cleaners and sanitary cleaners" is proposed to be replaced by "cleaning products". With this approach, the more general name will cover all products that are included in the EU Ecolabel and will lead to less confusion as to what is referred to when speaking of "all-purpose cleaners".

A review of other ecolabelling schemes found that the corresponding product categories are covered by ecolabels containing general terms such as 'cleaning products' (Table 5). A change of name of the EU Ecolabel to "cleaning products" would bring it in line with the Nordic Swan, Environmental Choice and Green Seal Schemes.

Table 5: Product category names used by other ecolabels

Labelling scheme	Product category	Region
Nordic Swan	Cleaning products	Denmark, Finland, Iceland, Norway, Sweden
Environmental Choice NZ	General purpose cleaning products	New Zealand
	Commercial and institutional cleaning products	New Zealand
Green Seal	Cleaning products for household use	USA
	Cleaning products for industrial and institutional use	USA
Good Environmental Choice AU	Cleaning products	Australia
Current EU Ecolabel	All-purpose cleaners and sanitary cleaners	EU

Regarding the **definition** of the products covered the EU Ecolabel, a clarification is proposed for the definition of window cleaners to include the surfaces intended to be cleaned with this product. The proposed definition has been adapted from New Zealand's Good Environmental Choice scheme, which uses the following definition: "*Glass and window cleaner means a product designed to clean glass or other highly polished surfaces, including window, mirrors and metallic surfaces*". This definition is not extended to include screens (television, computer, etc.) as regular window cleaners are not recommended to be used on such surfaces.

It is proposed to expand the **scope** of the EU Ecolabel to include both ready-to-use (RTU) and undiluted products for all product categories. In the current set of criteria, only all-purpose cleaners are explicitly allowed to be either in RTU or undiluted form; window cleaners are limited to RTU products and no specific information is given about sanitary cleaners. The need for this change in scope has been pointed out numerous times during consultation with stakeholders.

Moreover, in the current criteria set only all-purpose cleaners are explicitly limited to indoor use, although the inclusion of the "routine cleaning" clause for window cleaners and sanitary detergents could be understood to implicitly limit them to indoor use. In a bid to clarify the scope, it is proposed that the restriction to indoor use be expanded to all the covered products.

Wipes are not included in the scope of the current EU Ecolabel criteria for all-purpose cleaners and sanitary cleaners but it is proposed to explicitly exclude them in order to avoid confusion. The addition of a list of excluded products was also mentioned by stakeholders who consider that it is not always easy to understand which products fall under the EU Ecolabel and which do not.

Cleaning wipes are available for both professional and consumer markets; they are intended for a range of tasks including kitchen, bathroom and window cleaning. It is proposed to explicitly exclude these products as LCA studies report that it is unclear whether they are comparable with other products in terms of environmental performance. However, it is certain that wipes produce more solid waste than other forms of cleaning products. By explicitly excluding wipes in the EU Ecolabel scope, the criteria are brought in line with other voluntary labelling schemes such as the Nordic Swan.

The current EU Ecolabel text references the frequency of the use of products by specifying that only products intended for routine cleaning/removal of dirt and other deposits can seek an EU Ecolabel. The term "routine" is not defined and it is proposed that the user manual shall include text clarifying that the term should be understood as covering all cleaning besides cleaning that requires more effort due to it being exceptional such as drain unclogging, over cleaning, etc.

Proposal for new definition and scope (option 2)

The product group 'Cleaning Products' shall comprise: all-purpose-cleaners, window cleaners and sanitary cleaners.

- g) All-purpose cleaners comprising [cleaning](#) products intended for routine cleaning of hard surfaces such as walls, floors and other fixed surfaces.
- h) Window cleaners comprising specific [cleaning](#) intended for the routine cleaning of windows, [glass and other highly polished surfaces](#).
- i) Sanitary cleaners comprising [cleaning](#) products intended for the routine removal, including by scouring, of dirt and/or deposits in sanitary facilities, such as laundry rooms, toilets, bathrooms, showers and kitchens. This subgroup contains WC cleaners, bathroom cleaners and kitchen cleaners.

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 and must not contain micro-organisms that have been deliberately added by the manufacturer.~~ Wipes containing cleaning agents are not eligible for the EU Ecolabel for cleaning products.

A second version of the definition and scope text is proposed above and allows cleaning products that are not mixtures (e.g. vinegar) and products containing micro-organisms to seek an EU Ecolabel.

The definition proposed does not include the word "detergent" to describe the products as the Detergents Regulation defines a "detergent" as "any substance or mixture containing soaps and/or other surfactants intended for washing and cleaning processes. (...) Other products to be considered as detergents are: auxiliary washing mixture (...), laundry fabric-softener (...), cleaning mixture (...), other cleaning and washing mixtures (...)". Moreover, it does not include the requirement for all products to be "mixtures of chemical substances". These changes would allow manufacturers of pure vinegar intended for cleaning to seek this EU Ecolabel if, of course, they comply with all other criteria.

This revision work has not studied in detail the impact that micro-organisms have on the cleaning properties of products and as well as impacts on the environment. This work will be carried out following the 1st AHWG meeting.

Consultation questions

1	Should the product group name be changed from 'all-purpose cleaners and sanitary cleaners' to 'cleaning products'?
2	If not, what is a suitable name for this product group?
3	Should kitchen cleaners be included under sanitary cleaners or all-purpose cleaners?
4	Should undiluted sanitary cleaners and window cleaners be included in this product category?
5	Should the EU Ecolabel be restricted to products intended for indoor use?
6	Should WC cleaners be treated as a separate category and with limits under each relevant criterion?
7	Is an explicit exclusion of wipes necessary?
8	Are there any other products which should be included?
9	Are there any other products which should be explicitly excluded?

10	Should a list of products not covered be included? Or is this more suited to the User Manual?
11	Is an explicit definition for "routine cleaning" necessary?
12	Should the definition and scope be changed to cover products that are not mixtures of substances?
13	Should micro-organisms be considered for inclusion in the EU Ecolabel? Background information on the subject is sought from stakeholders.

7.2 Definitions

Current definition text

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

1. 'substance' means a chemical element and its compounds in the natural state or obtained by any production process, including any additive necessary to preserve the stability of the product and any impurity deriving from the process used but excluding any solvent, which may be separated without affecting the stability of the substance or changing its composition;
2. 'product' (or 'mixture') means a mixture or solution of two or more substances, which do not react.

Proposal for definitions text

(1) "ingoing substances and mixtures" means

- biocides, fragrances, colouring agents, and mixtures thereof, regardless of concentration in the final formulation,
- substances and mixtures intentionally added, by-products and impurities from raw materials, the concentration of which equals or exceeds 0,010% by weight of final formulation;

(2) "undiluted product" means a product that is diluted in water prior to use;

(3) "ready-to-use (RTU) product" means a product that should not be diluted in water before use;

(4) "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.

Rationale and discussion

For further information on the update of definitions listed, refer to Section 4 of the Technical Annexe.

The criteria for the product groups covered by the EU Ecolabel for all-purpose cleaners and sanitary cleaners have separate requirements for undiluted and ready-to-use products and therefore the definitions for these terms are proposed to be explicitly added. The definition for "concentrated products" (see Section 4 of the Technical Annexe) is not on the list of proposed additions as traditional and concentrated products do not have different requirements in this EU Ecolabel.

The definition for "substance" is proposed to be replaced with "ingoing substances and mixtures", which also provides information on the measurement thresholds for the different types of substances and mixtures covered. The definition of "product" is proposed to be removed as it overlaps with the definition of "detergent" as found in the Detergents Regulation.

8 TECHNICAL REPORT / CRITERIA PROPOSALS

8.1 Assessment and verification requirements and measurement thresholds

Current assessment and verification requirements and measurement thresholds

a) Requirements

The specific assessment and verification requirements are indicated within each criterion

Where the applicant is required to provide declarations, documentation, analysis test reports, or other evidence to show compliance with the criteria, it is understood that these may originate from the applicant and/or his supplier(s) and/or their supplier(s) etc., as appropriate.

Where possible, the testing should be performed by laboratories that meet the general requirements of EN ISO 17025 or equivalent.

Where appropriate, test methods other than those indicated for each criterion may be used if the competent body assessing the application accepts their equivalence.

Appendix I makes reference to the Detergents Ingredients Database (DID) list which contains the most widely used ingredients used in detergent formulations. It shall be used for deriving the data for the calculations of the Critical Dilution Volume (CDV) and for the assessment of the biodegradability of the ingredients. For substances not present on the DID list, guidance is given on how to calculate or extrapolate the relevant data. The latest version of the DID list is available from the EU Ecolabel website or via the websites of the individual competent bodies.

Where appropriate, competent bodies may require supporting documentation and may carry out independent verifications.

b) Measurement thresholds

All substances in the product, including additives (e.g. preservatives or stabilisers) in the ingredients, of which the concentration exceeds 0,010 % by weight of the final formulation shall comply with the EU Ecolabel criteria, except for Criterion 1, where each intentionally added substance should be included, irrespective of its weight. Impurities resulting from the production of the ingredients which are present in concentrations > 0,010 % by weight of the final formulation shall also comply with the criteria.

Proposal for assessment and verification requirements and measurement thresholds

a) Requirements

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

Where the applicant is required to provide declarations, documentation, analyses, test reports, or other evidence to show compliance with the criteria, these may originate from the applicant or his supplier(s) or both.

Where possible, the testing shall be performed by laboratories that meet the general requirements of European Standard EN ISO 17025 or equivalent.

Where appropriate, test methods other than those indicated for each criterion may be used if the competent body assessing the application accepts their equivalence.

Where appropriate, competent bodies may require supporting documentation and may carry out independent verifications.

The Appendix makes reference to the "Detergent Ingredient Database" list (DID list) which contains the most widely used ingredients in detergents and cosmetics formulations. It shall be used for deriving the data for the calculations of the Critical Dilution Volume (CDV) and for the assessment of the biodegradability of the ingoing substances and mixtures. For substances or mixtures not present on the DID list, guidance is given on how to calculate or extrapolate the relevant data. The latest version of the DID list is available from the EU Ecolabel website or via the websites of the individual competent bodies.

The following information shall be provided to the competent body:

(i) The full formulation of the product indicating trade name, chemical name, CAS no. and INCI designations, DID no.2, the ingoing quantity including and excluding water, the function and the form of all ingoing substances and mixtures regardless of concentration;

(ii) safety data sheets for each ingoing substance or mixture in accordance with Regulation (EC) No 1907/2006 of the European Parliament and of the Council.

b) Measurement thresholds

Compliance with the ecological criteria is required for all ingoing substances and mixtures, with the exception of compliance with criterion 3*(b) and 3*(c) for preservatives, colorants and fragrances which is requested when their concentration equals or exceeds 0,010% by weight in the final formulation.

*number of criterion to be changed based on the final structure of the criteria

Rationale and discussion

a) Requirements

The text regarding the assessment and verification requirements is proposed to be aligned with the text from the EU Ecolabel on Rinse-off Cosmetics. One of the most significant changes proposed is the addition of the text that clarifies what is to be provided to the CB – it is not present in the current criteria.

b) Measurement thresholds

The measurement threshold is the concentration of ingredients in the product for which there is a requirement for documentation of compliance with the ecological criteria. It is proposed to harmonise the measurement thresholds for all the EU Ecolabels in the detergents group and the EU Ecolabel for rinse-off cosmetics.

The new text and thresholds are discussed in Section 5 of the Technical Annex.

In the specific case of the EU Ecolabel for all-purpose cleaners and sanitary cleaners, the new text partially changes the thresholds for additives (e.g. biocides, fragrances and colouring agents). Namely in the current text, additives were only to be considered if their concentration in the final formulation was equal or above 0,01% except in the criterion on toxicity to aquatic organisms where all additives were to be considered, regardless of concentration. The new text states that additives are only to be considered if their concentration in the final formulation is equal or above 0,01% for criteria 3(b) and 3(c) related to hazardous substances, for all other criteria all additives should be considered, regardless of their concentration. When considering the different criteria in the EU Ecolabel, the only one that is affected by the change is that related to biodegradability.

8.2 Reference dosage

Current requirements for reference dosage

For all-purpose cleaners which are diluted in water prior to use, the dosage in grams of the product recommended by the manufacturer for preparing 1 litre of washing water for cleaning of normally soiled surfaces is taken as the reference dosage for the calculations aiming at documenting compliance with the EU Ecolabel criteria and for testing of cleaning ability.

Proposal for reference dosage

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)	100g
Undiluted products	Dosage in grams recommended by the manufacturer for preparing 1 litre of washing water for cleaning normally soiled surfaces (indicated in g/l washing water or ml/l washing water)

Rationale and discussion

A reference dosage is the quantity of product used when calculating compliance with ecological requirements such as biodegradability and CDV. Further information on functional units and reference dosage in EU Ecolabels related to detergents can be found in Section 6 of the Technical Annex.

This section of the current criteria only lists the reference dosage for "undiluted all-purpose cleaners". In order to cover all undiluted products other than all-purpose cleaners that also fall under the EU Ecolabel, the wording is proposed to be changed to "products". Although it is already indicated in the text of the respective criteria, it is also proposed to add the reference dosage for RTU products to this section.

The quantities taken as reference dosages are proposed to be kept the same, while simply expanding the wording to include all the products included in the expanded scope. As all-purpose cleaners and sanitary cleaners cover a wide range of products that have different applications, no common functional unit that should be washed can be stated, thus the generic reference dosage of 100g is applied.

8.3 Criterion 1: Toxicity to aquatic organisms

Current criterion 1

For all-purpose cleaners which are diluted in water prior to use, the CDV_{chronic} shall be calculated on the basis of the dosage in grams of the product recommended by the manufacturer for preparing 1 litre of washing water for cleaning of normally soiled surfaces. The CDV_{chronic} of the recommended dose expressed for 1 litre of washing water shall not exceed 18,000 litres.

For all-purpose cleaners which are used without dilution, the CDV_{chronic} for 100 g of the product shall not exceed 52,000 litres.

For window cleaners, the CDV_{chronic} for 100 g of the product shall not exceed 4,800 litres.

For sanitary cleaners, the CDV_{chronic} for 100 g of the product shall not exceed 80,000 litres.

Assessment and verification: the exact formulation of the product shall be provided to the competent body, together with the details of the CDV_{chronic} calculations showing compliance with this Criterion.

Proposal for criterion 1

he critical dilution volume (CDV) of the product must not exceed the following limits [for the reference dosage](#):

Product type	Limit CDV
All-purpose cleaners, RTU	52 000
All-purpose cleaners, undiluted	12 200
Window cleaners, RTU	4 800
Window cleaners, undiluted	1 200
Sanitary cleaners, RTU	72 000
Sanitary cleaners, undiluted	18 000
Toilet (WC) cleaners, RTU	80 000

Assessment and verification: Calculation of the CDV of the product. A spreadsheet for calculation of the CDV value is available on the EU Ecolabel website.

The Critical Dilution Volume (CDV) is calculated for all ingoing substances and mixtures (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 a substance or mixture is not included in the DID list Part A, the applicant shall estimate the values follow the approach described in the DID list Part B (Appendix I).

Rationale and discussion

Detergents have great potential to cause disturbances in aquatic ecosystems as they cause chemical emissions to water during their entire life cycle. For this reason, EU Ecolabels limit the amount of emissions due to EU Ecolabel products. Critical Dilution Volume (CDV) is used in the current EU Ecolabels related to detergents to assess toxicity to aquatic organisms. It is proposed to keep this assessment method in this revision. *Further description of CDV and discussion of other assessment methods can be found in the Technical Annexe, Section 8.1.*

In order to revise the CDV limits for the different products covered by this EU Ecolabel for all-purpose cleaners and sanitary cleaners, stakeholders (including competent bodies) were contacted and asked to provide information on CDV values of products on the market. A total of 240 CDV values for products in this category have been received, all concerning products that have applied to be awarded the EU Ecolabel for all-purpose cleaners and sanitary cleaners or other similar ecolabels, Table 6 (data presented in Appendix 1 of this document). These have been split into five different groups as they exist in the current EU Ecolabel (marked in black in Table 6). No reliable data on CDV values was found for the two categories proposed to be included in the EU Ecolabel (undiluted window and sanitary cleaners). Toilet cleaners are presented as a separate category to sanitary cleaners, but because many products were labelled simply as 'sanitary cleaners', without further specification, there might still be some products which are toilet cleaners in the sanitary cleaners category. Nevertheless, it can be observed that toilet cleaners have higher CDV values than most sanitary cleaners.

Table 6: CDV ranges identified for different product types (rounded to the closest 100)

	No.	CDV			Current Limit	Proposed Limit
		Min	Max	Average		
All-purpose purpose cleaners (RTU)	4	5 600	50 500	29 200	52 000	52 000
All-purpose cleaners (undiluted)	120	1 300	18 000*	10 100	18 000	12 200
Window cleaners (RTU)	40	1 000	4 800	4 000	4 800	4 800
Window cleaners (undiluted)	n.d.	n.d.	n.d.	n.d.	n.d.	1 200
Sanitary cleaners (RTU)	71	1 000	79 500	53 400	80 000	72 000
Sanitary cleaners (undiluted)	n.d.	n.d.	n.d.	n.d.	n.d.	18 000
Toilet (WC) cleaners	5	45 700	80 000	65 400	80 000**	80 000

N.B. Reliable data for concentrated sanitary cleaners and window cleaners (undiluted) not available

*two values abnormally high values (41 500 and 79 100) have been disregarded in order not to skew results

**limit for sanitary cleaners has been used

As part of the investigation, the current EU Ecolabel CDV values have been compared to those in the current Nordic Swan criteria for cleaning products (Table 7) as well as in the NF Environnement criteria (Table 8). For ready to use products the Nordic Swan the product's CDV using the weight of 1 litre of product as the dosage, but the EU Ecolabel uses 100g of product as the dosage; this makes direct comparison of the limits more difficult, but essentially, the equivalent CDV value for the EU Ecolabel would be a factor of 10 lower (i.e. the ratio 1 kg (assumed 1 litre) to 100 g). For both Nordic Swan and NF Environnement, product categories do not always correspond to those found in the EU Ecolabel, especially in the case of Nordic Swan. The closest EU Ecolabel equivalent product category has been indicated in Table 7 to ease comparisons.

Table 7: CDV limits for the Nordic Swan "cleaning products" categories

Category	CDV _{chronic} c	CDV _{chronic} brought to EU Ecolabel reference dosage	Equivalent Ecolabel group	EU product	Equivalent EU Ecolabel CDV (current)
Concentrated, consumer	10 500	10 500	All-purpose (undiluted)	cleaner	18 000
RTU WC, consumer	600 000	60 000	Toilet (WC) cleaner		80 000
RTU other, consumer	700 000	70 000	All-purpose cleaner (RTU)		52 000
RTU window, consumer and professional	75 000	7 500	Window cleaner (RTU)		4 800
Concentrated, professional	9 500	9 500	All-purpose (undiluted)	cleaner	18 000
RTU WC, professional	700 000	70 000	Toilet (WC) cleaner		80 000
RTU, professional	450 000	45 000	All-purpose cleaner (RTU)		52 000

Table 8: CDV limits for NF Environnement "cleaning products" (produits de nettoyage) categories

Category	CDV limit
Undiluted products	20 000
RTU products	100 000
Window cleaners (RTU or 100g of diluted product)	5 000

It can be observed that NF Environnement's CDV limits are much higher than the ones currently found in the EU Ecolabel; in the case of the Nordic Swan, the limits are overall lower.

The revision of CDV limits should take into account the fact the DID list has been updated in 2014. Some values have been updated and might have an influence on the CDV values of existing products, although it is yet unclear if the changes are drastic enough to cause products to lose compliance with the CDV requirement. As exact formulations were not available during this revision, it is not possible to comment on whether the update of the DID list should have an impact on the CDV values in criterion on toxicity to aquatic organisms in the EU Ecolabel for all-purpose cleaners and sanitary cleaners.

Proposal for new limits

As few data were available for **RTU all-purpose cleaners**, the average value of 29 200 litres cannot be taken as representative because of the large disparities between data points. Thus no changes are proposed for this limit.

An analysis of the recorded applications under **undiluted all-purpose cleaners**, shows that currently ecolabelled (EU Ecolabel and other ecolabels) products have CDV values between 1 300 and 18 000 (or just under it) for their respective recommended dosages (see Figure 3). Accordingly, it is proposed to tighten this requirement by 10% and requiring a maximum CDV value of 12 200. With this new value, over 75% of currently ecolabelled products would still meet the requirement. This level is still above the equivalent value for the Nordic Swan cleaners (consumers, concentrated) at 10 500 and (professional, concentrated) at 9 500.

An analysis of the CDV values for **RTU window cleaners** shows that 66% of them lie above 4 000, with a good number close to the current limit of 4 800 (Figure 4). Accordingly it is not proposed to change the limit values without further substantiating evidence.

Stakeholders requested that window cleaners be separated into RTU and undiluted categories (see Section 2.3 of the Preliminary Report). Accordingly, provision for a new category has been made for **undiluted window cleaners**. No data was available for CDV values related to undiluted window cleaners but a value of 1 200 litres is proposed for discussion. This value was reached by analogy between the ratio of CDV values RTU:undiluted for all-purpose cleaners.

In this revision, stricter limits are proposed for **RTU sanitary cleaners**. As indicated above, once (identifiable) WC cleaners are separated from the sanitary cleaners, the average CDV value is distinctly lower than both taken together. From Table 6, it can be seen that the average CDV values are 65 400 and 53 400 for WC and sanitary cleaners, respectively. (The latter may still contain WC cleaners which have not been well described, as indicated by the maximum CDV value still being near the current limit of 80 000.) A general lowering of the limits for the RTU sanitary cleaners category therefore seems rational – a 10% decrease, from 80 000 to 72 000 litres is proposed for discussion. This is a conservative figure, higher than the current equivalent Nordic Swan values of 45 000 and 60 000, and that is less than might be indicated if the pro-rata average values of the two categories were taken ($53\,400 / 65\,400 * 80,000 = 65\,300$) but this reflects the uncertainty in the data received.

Undiluted sanitary cleaners have been added to the product scope following requests from stakeholders. Consequently, new limits are required for the ecological criteria to allow for this addition. Some CDV limits for concentrated sanitary products have been provided, but not enough to set limits for this product type with any degree of confidence. Through discussions with competent bodies it was found that some concentrated sanitary cleaners had already been awarded the EU Ecolabel. For the purposes of setting a value for discussion and consultation, a level of 18 000 is proposed. This is on the basis of the ratio of concentrated:RTU values for sanitary cleaners being similar to the equivalent ratio for all-purpose cleaners, taken on the same basis.

The examination of the CDV values of EU Ecolabel sanitary cleaners revealed that in general **RTU WC cleaners** have the highest CDV values of all the products that can be discerned in the sanitary cleaners category. Nordic Swan has a separate category for WC cleaners, which only includes products intended for use on toilets and excludes cleaners for other sanitary porcelain and bathroom cleaners. The reason for separating toilet cleaners from other sanitary cleaners is that they contain harsher ingredients such as strong acids which are required for the removal of mineral deposits, normal organic and inorganic soils and so will be expected to push against CVD limits. Because this is a proposal for a dedicated limit for these high impact materials, it is proposed that the existing CDV value of 80 000 for the sanitary cleaners be retained.

N.B. Since CDV is the only major differentiating feature of WC cleaners in this category, it is not proposed to formally split the category (which would require values in every other criterion).

Consultation questions	
1	More information is required from stakeholders in terms of CDV values for all categories and exact formulations.
2	Does the 2014 DID list update cause major changes to CDV values?
3	Are the new proposals for CDV values appropriate?
4	Should RTU Toilet (WC) cleaners be in a separate category?

8.4 Criterion 2: Biodegradability of surfactants

Current criterion 2

a) Ready biodegradability (aerobic)

Each surfactant used in the product shall be readily biodegradable.

b) Anaerobic biodegradability

Surfactants that are not biodegradable under anaerobic conditions may be used in the product within specified limitations provided that the surfactants are not classified with H400/R50 (Very toxic to aquatic life) within the limit specified below.

For all-purpose cleaners to be diluted with water prior to use, the total weight of anaerobically non-biodegradable surfactants must not exceed 0.40 g of the recommended dose expressed for 1 litre of washing water.

For all-purpose cleaners to be used without dilution, the total weight of anaerobically non-biodegradable surfactants must not exceed 4.0 g per 100 g product.

For sanitary cleaners, the total weight of anaerobically non-biodegradable surfactants must not exceed 2.0 g per 100 g product.

For window cleaners, the total weight of anaerobically non-biodegradable surfactants must not exceed 2.0 g per 100 g product.

Assessment and verification: the exact formulation of the product as well as a description of the function of each substance shall be provided to the competent body. The DID list-Part A (Appendix I) indicates whether a specific surfactant is anaerobically biodegradable or not (the surfactants with an entry of 'Y' in the column on anaerobic biodegradability are biodegradable under anaerobic conditions). For surfactants which are not included in the DID list-Part A, the relevant information from literature or other sources, or appropriate test results, showing that they are anaerobically biodegradable shall be provided. The reference test for anaerobic degradability shall be OECD 311, ISO 11734, ECETOC No 28 (June 1988) or an equivalent test method, with the requirement of a minimum of 60 % ultimate degradability under anaerobic conditions. Test methods simulating the conditions in a relevant anaerobic environment may also be used to document that 60 % ultimate degradability has been attained under anaerobic conditions.

Proposal for criterion 2 – "Biodegradability"

a) Biodegradability of surfactants

To be discussed at the 1st AHWG meeting.

All surfactants shall be biodegradable under aerobic conditions.

All surfactants shall be biodegradable under anaerobic conditions.

b) Biodegradability of organic substances and mixtures

To be discussed at the 1st AHWG meeting.

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

Product type	aNBO	anNBO
All-purpose cleaners, RTU	x,xx g	x,xx g
All-purpose cleaners, concentrated	x,xx g	x,xx g
Window cleaners, RTU	x,xx g	x,xx g
Window cleaners, concentrated	x,xx g	x,xx g
Sanitary cleaners, RTU	x,xx g	x,xx g
Sanitary cleaners, Concentrated	x,xx g	x,xx g
WC cleaners, RTU	x,xx g	x,xx g

Assessment and verification: The applicant shall provide documentation for the degradability of

surfactants, as well as the calculations of aNBO and anNBO for the product. A spreadsheet for use in calculating aNBO and anNBO values is available on the EU Ecolabel website.

For both surfactants and aNBO and anNBO values, reference shall be made to the DID List. For ingredients 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 Appendix (to be added).

In the absence of documentation in accordance with the above requirements, an ingoing substances and mixtures 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.

Testing for adsorption/desorption may be conducted in accordance with OECD guidelines 106.

Rationale and discussion

In the current EU Ecolabel criteria for all-purpose cleaners and sanitary cleaners only the biodegradability of surfactants is considered. Nevertheless, cleaning products contain other substances that are not readily biodegradable (aerobically, aNBO), including phosphonates, EDTA, fragrances, polymers, colouring agents and thickening agents. They also contain substances that are not anaerobically degradable (anNBO), including sulphonated anionic surfactants, phosphonates, fragrances and colouring agents.

As explained in Section 9 of the Technical Annexe, the use of non-biodegradable (aNBO, anNBO) ingredients should be limited as substances which do not degrade rapidly in the environment have the potential to exert toxicity. A limitation (i.e. having maximum concentrations) allows for flexibility with formulations whilst reducing the risk to the environment.

As six EU Ecolabels related to detergents are being revised at the same time and as these products often have similar formulations, it is judicious to consider the harmonisation of their criteria. In the case of biodegradability, the current six EU Ecolabel criteria approach the subject using three different approaches and stakeholder consultation has yielded a multitude opinions. It has thus been decided that background research on the subject (Technical Annexe, Section 9) will be presented during the 1st AHWG meeting and the criterion on biodegradability will be revised following discussions with stakeholders.

Consultation questions

1	Is the proposed approach to biodegradability suitable for APC?
2	What would be the appropriate limits for aNBO and anNBO? Could stakeholders please share with the project team data on the amount of aNBO and anNBO organic substances and mixtures in the product groups covered?

8.5 Criterion 3: Excluded or limited substances and mixtures

Current criterion 3a-b

(a) Specified excluded substances

The following ingredients must not be included in the product, either as part of the formulation or as part of any mixture included in the formulation:

- alkylphenol ethoxylates (APEOs) and derivatives thereof
- EDTA (ethylenediaminetetraacetate)
- 5-bromo-5-nitro-1,3-dioxane
- 2-bromo-2-nitropropane-1,3-diol
- diazolinidylurea
- formaldehyde
- sodium hydroxymethylglycinate
- nitro-musks and polycyclic musks, including for example:
 - Musk xylene: 5-tert-butyl-2,4,6-trinitro-m-xylene
 - Musk ambrette: 4-tert-butyl-3-methoxy-2,6-dinitrotoluene
 - Moskene: 1,1,3,3,5-pentamethyl-4,6-dinitroindan
 - Musk tibetine: 1-tert-butyl-3,4,5-trimethyl-2,6-dinitrobenzene
 - Musk ketone: 4'-tert-butyl-2',6'-dimethyl-3',5'-dinitroacetaphenone
 - HHCB (1,3,4,6,7,8-hexahydro-4,6,6,7,8,8-hexamethylcyclopenta(g)-2-benzopyran)
 - AHTN (6-acetyl-1,1,2,4,4,7-hexamethyltetralin).

Assessment and verification: the applicant shall provide a declaration supported by declarations from manufacturers of substances, as appropriate, confirming that the listed substances have not been included in the product.

(b) Quaternary ammonium salts

Quaternary ammonium salts that are not readily biodegradable shall not be used, either as part of the formulation or as part of any mixture included in the formulation.

Assessment and verification: the applicant shall provide documentation showing the biodegradability of any quaternary ammonium salt used.

Proposal for criterion 3(a) – "Specified excluded ingoing substances and mixtures"

a) The product shall not be formulated or manufactured using any of the following compounds:

- (i) APEO (alkylphenol ethoxylates) and APD (alkylphenol derivatives)
- (ii) EDTA (ethylenediaminetetraacetate)
- (iii) 5-bromo-5-nitro-1,3-dioxane
- (iv) 2-bromo-2-nitropropane-1,3-diol
- (v) Diazolinidylurea
- (vi) Formaldehyde
- (vii) Sodium hydroxymethylglycinate
- (viii) Nitro-musks and polycyclic musks
- (ix) The following fragrances and ingredients of the fragrance mixtures: Hydroxyisohexyl 3-cyclohexene carboxaldehyde (HICC), Atranol and Chloroatranol;
- (x) Quaternary ammonium salts that are not readily biodegradable
- (xi) Fragrance substances subject to the declaration requirement provided for in Regulation (EC) No 648/2004 of the European Parliament and of the Council on detergents (Annex VII) and which are not already excluded by criterion 2b shall not be present in quantities $\geq 0,010\%$ (≥ 100 ppm) per substance.
- (xii) Phosphates or phosphorus compounds shall not be included in the product, neither as part of the formulation nor as part of any mixture included in the formulation.

Assessment and verification: the applicant shall provide a declaration supported by declarations from manufacturers of substances, as appropriate, confirming that the listed substances have not been included in the product.

The applicant shall provide documentation showing the biodegradability of any quaternary ammonium salt used.

The applicant shall also provide a declaration from the fragrance manufacturer specifying the content of each of the substances in the fragrances which are listed in Annex III of the Regulation (EC) No 1223/2009.

Rationale and discussion

Limiting environmentally harmful substances from products covered by the scope of the EU Ecolabel for all-purpose cleaners and sanitary cleaners is important, as most of the ingredients making up these products end up in the aquatic environment after use, ideally after going through wastewater treatment systems but sometimes also directly after use.

The requirement (a) *Specified excluded ingoing substances and mixtures* lists substances of concern, which have strong negative properties and cause significant impacts and are should not be present in EU Ecolabel products. Among them, they might also be substances that are classified or excluded above the concentration of 0,01% by sub-section (b) *Hazardous substances and mixtures* of this criterion. Nevertheless, due to a lack of harmonised classification and their potential hazard, it seems reasonable to cover the most impacting substances under this section and exclude them completely from the EU Ecolabel products. Overlaps in criteria regarding substances will be tackled in later stages of the EU Ecolabel revision process.

The information and grounds that lead to the exclusion of the following substances and substance groups are summarized in Section 10.1 of the Technical Annexe.

At present the following substances are proposed to be added to the excluded substances list based on initial feedback and information collected:

- APD (alkylphenol derivatives),
- 3-cyclohexene carboxaldehyde (HICC), Atranol and Chloroatranol,

Additionally, in line with other detergent product criteria revisions, it is proposed to remove the exemplification of musks. A list can be included into use manual, if considered helpful by the CBs and applicants.

Consultation questions

1 Are exclusions of other substances required?

Current criterion 3c

(c) Hazardous substances and mixtures

According to the Article 6(6) of Regulation (EC) No 66/2010, the product or any part of it shall not contain substances (in any forms, including nanoforms) meeting criteria for classification with the hazard statements or risk phrases specified below in accordance with Regulation (EC) No 1272/2008 of the European Parliament and of the Council (1) or Council Directive 67/548/EEC (2) nor shall it contain substances referred to in Article 57 of Regulation (EC) No 1907/2006 of the European Parliament and of the Council (3). The risk phrases below generally refer to substances. However, for mixtures of enzymes and fragrances, where information on substances cannot be obtained, the classification rules for mixtures shall be applied.

List of hazard statements:

GHS Hazard Statement	EU Risk Phrase
H300 Fatal if swallowed	R28
H301 Toxic if swallowed	R25
H304 May be fatal if swallowed and enters airways	R65
H310 Fatal in contact with skin	R27
H311 Toxic in contact with skin	R24
H330 Fatal if inhaled	R23/26
H331 Toxic if inhaled	R23
H340 May cause genetic defects	R46
H341 Suspected of causing genetic defects	R68
H350 May cause cancer	R45
H350i May cause cancer by inhalation	R49
H351 Suspected of causing cancer	R40
H360F May damage fertility	R60
H360D May damage the unborn child	R61
H360FD May damage fertility. May damage the unborn child	R60-61
H360Fd May damage fertility. Suspected of damaging the unborn child	R60-63
H360Df May damage the unborn child. Suspected of damaging fertility	R61-62
H361f Suspected of damaging fertility	R62
H361d Suspected of damaging the unborn child	R63
H361fd Suspected of damaging fertility. Suspected of damaging the unborn child.	R62-63
H362 May cause harm to breast fed children	R64
H370 Causes damage to organs	R39/23; R39/24; R39/25; R39/26; R39/27; R39/28
H371 May cause damage to organs	R68/20; R68/21; R68/22
H372 Causes damage to organs through prolonged or repeated exposure	R48/25; R48/24; R48/23
H373 May cause damage to organs through prolonged or repeated exposure	R48/20; R48/21; R48/22
H400 Very toxic to aquatic life	R50
H410 Very toxic to aquatic life with long-lasting effects	R50-53
H411 Toxic to aquatic life with long-lasting effects	R51-53
H412 Harmful to aquatic life with long-lasting effects	R52-53
H413 May cause long-lasting harmful effects to aquatic life	R53
EUH059 Hazardous to the ozone layer	R59
EUH029 Contact with water liberates toxic gas	R29
EUH031 Contact with acids liberates toxic gas	R31
EUH032 Contact with acids liberates very toxic gas	R32
EUH070 Toxic by eye contact	R39-41

Sensitising substances

H334: May cause allergy or asthma symptoms or breathing difficulties if inhaled	R42
H317: May cause allergic skin reaction	R43

Substances or mixtures which change their properties upon processing (e.g. become no longer bioavailable, undergo chemical modification) so that the identified hazard no longer applies are exempted from the above requirement.

Derogations: the following substances or mixtures are specifically exempted from this requirement:

Surfactants in concentrations <25 % in the product (*)	H400 Very toxic to aquatic life	R50
Surfactants in concentrations <25 % in the product(**)	H412 Harmful to aquatic life with long-lasting effects	R52-53
Fragrances	H412 Harmful to aquatic life with long-lasting effects	R52-53
Enzymes(***)	H317: May cause allergic skin reaction H334: May cause allergy or asthma symptoms or breathing difficulties if inhaled	R43 R42
NTA as an impurity in MGDA and GLDA(****)	H351 suspected of causing cancer	R40

(*) The percentage must be divided by the M-factor established in accordance with the Regulation (EC) No 1272/2008.

(**) This derogation is applicable provided that they are readily degradable and anaerobically degradable.

(***) Including stabilisers and other auxiliary substances in the preparations.

(****) In concentrations lower than 1.0 % in the raw material as long as the total concentration in the final product is lower than 0.10 %.'

Assessment and verification: the applicant shall provide the exact formulation of the product to the competent body. The applicant shall demonstrate compliance with this Criterion for substances in the product on the basis of information consisting as a minimum of that specified in Annex VII to the Regulation (EC) No 1907/2006. Such information shall be specific to the particular form of the substance, including nanoforms, used in the product. For that purpose, the applicant shall provide a declaration of compliance with this Criterion, together with a list of ingredients and related Safety Data Sheets in accordance with Annex II to Regulation (EC) No 1907/2006 for the product as well as for all substances listed in the formulation(s). Concentration limits shall be specified in the Safety Data Sheets in accordance with Article 31 of Regulation (EC) No 1907/2006

Proposal for criterion 3(b) – "Hazardous substances and mixtures"

b) According to Article 6(6) of Regulation (EC) No 66/2010, the EU Ecolabel may not be awarded to any product that contains substances meeting criteria for classification with the hazard statements specified in Table 2 in accordance with Regulation (EC) No 1272/2008 of the European Parliament or substances referred to in Article 57 of Regulation (EC) No 1907/2006. The hazard statements in Table 2 generally refer to substances. However, if information on substances cannot be obtained, the classification rules for mixtures apply.

Substances or mixtures which change their properties through processing and thus become no longer bioavailable, or undergo chemical modification in a way that removes the previously identified hazard are exempted from criterion X(b).

Table 2: Hazard statements

GHS Hazard Statement
H300 Fatal if swallowed
H301 Toxic if swallowed
H304 May be fatal if swallowed and enters airways
H310 Fatal in contact with skin

H311 Toxic in contact with skin
H330 Fatal if inhaled
H331 Toxic if inhaled
H340 May cause genetic defects
H341 Suspected of causing genetic defects
H350 May cause cancer
H350i May cause cancer by inhalation
H351 Suspected of causing cancer
H360F May damage fertility
H360D May damage the unborn child
H360FD May damage fertility. May damage the unborn child
H360Fd May damage fertility. Suspected of damaging the unborn child
H360Df May damage the unborn child. Suspected of damaging fertility
H361f Suspected of damaging fertility
H361d Suspected of damaging the unborn child
H361fd Suspected of damaging fertility. Suspected of damaging the unborn child.
H362 May cause harm to breast fed children
H370 Causes damage to organs
H371 May cause damage to organs
H372 Causes damage to organs through prolonged or repeated exposure
H373 May cause damage to organs through prolonged or repeated exposure
H400 Very toxic to aquatic life
H410 Very toxic to aquatic life with long-lasting effects
H411 Toxic to aquatic life with long-lasting effects
H412 Harmful to aquatic life with long-lasting effects
H413 May cause long-lasting harmful effects to aquatic life
EUH059 Hazardous to the ozone layer
EUH029 Contact with water liberates toxic gas
EUH031 Contact with acids liberates toxic gas
EUH032 Contact with acids liberates very toxic gas
EUH070 Toxic by eye contact
H334: May cause allergy or asthma symptoms or breathing difficulties if inhaled
H317: May cause allergic skin reaction

This criterion applies to all ingredients present in concentrations $\geq 0,01$ %, including preservatives, colouring agents and fragrances.

For consumer cleaning products, the substances in Table 3 are exempted from the obligation in Article 6(6) of Regulation (EC) No 66/2010 following application of Article 6(7) of the same Regulation.

Table 3: Derogated substances - To be discussed in the 1st AHWG meeting

Assessment and verification: the applicant shall demonstrate compliance with criterion x (b) for any ingoing substance or mixture present at concentrations greater than 0,010% in the product.

A declaration of compliance shall be provided by the applicant supported, where appropriate, by the declarations from producer(s) of the raw materials that none of these ingoing substances and/or mixtures meet the criteria for classification with one or more of hazard statements listed in Table 2 in the form(s) and physical state(s) they are present in the product.

The following technical information related to the form(s) and physical state(s) of the ingoing substances and/or mixtures as present in the product shall be provided to support the declaration of non-classification:

(i) For substances that have not been registered under Regulation (EC) No 1907/2006 and/or which do not yet have a harmonised CLP classification: Information meeting the requirements listed in Annex VII to that Regulation;

(ii) For substances that have been registered under Regulation (EC) No 1907/2006 and which do not meet the requirements for CLP classification: Information based on the REACH registration dossier confirming the non-classified status of the substance;

(iii) For substances that have a harmonised classification or are self-classified: safety data sheets where available. If these are not available or the substance is self-classified then information shall be provided relevant to the substances hazard classification according to Annex II to Regulation (EC) No 1907/2006;

(iv) In the case of mixtures: safety data sheets where available. If these are not available then calculation of the mixture classification shall be provided according to the rules under Regulation (EC) No 1272/2008 together with information relevant to the mixtures hazard classification according to Annex II to Regulation (EC) No 1907/2006.

For substances listed in Annexes IV and V to Regulation (EC) No 1907/2006, which are exempted from registration obligations under point (a) and (b) of Article 2(7) of that Regulation, a declaration to this effect by the applicant shall suffice to comply with criterion 3(b).

A declaration on the presence of ingoing substances that fulfil the derogation conditions shall be provided by the applicant, supported, where appropriate, by declarations from the producer(s) of the raw materials. Where required for the derogation, the applicant shall confirm the concentrations of these ingoing substances in the final product.

Rationale and discussion

Background information on the criterion for hazardous substance is given in Technical Annexe, Section 10.2.

Assessment and verification

The assessment and verification has been updated to harmonise with recently voted similar product group (ROC).

Derogation for enzymes with H400

In response to the consultation, stakeholders requested that a derogation should be added for enzymes classified with H400 (very toxic to aquatic life). Stakeholders commented that this derogation is required due to the classification of several proteases. However, stakeholders only gave limited reasoning for the addition of this derogation: *“Some proteases can be classified as H400. A derogation could be considered, similarly to the amendment made to the I&I laundry and dishwashing detergents criteria”*. It should be noted that this derogation is included in the current EU Ecolabel criteria for IILD and IDD.

Proteases (subtilisins) are a common class of enzymes used in detergents and household cleaning products. They are used in household cleaning products to remove proteinaceous stains and deposits, such as mud, dairy products, baby food, blood and eggs. The concentrations of proteases used in cleaning products is very low and ranges from around 0,007 % to 0,1 %. In terms of environmental performance, as enzymes are proteins they are readily and ultimately biodegradable and as a consequence are removed to a very high extent from sewage treatment plants. A HERA report on subtilisins found them to be suitable for use in household products and concluded that they do not represent a safety concern for consumers and their use in detergents does not provide a risk for the environment.⁵

Further information on the use of enzymes in cleaning products can be found in Section 10.2.4 of the Technical Annexe.

However at this stage it has not been possible to gather enough evidence to support a derogation. In accordance with the EU Ecolabel Regulation (66/2010) derogations are only allowed when it is not technically feasible to substitute the substance or if the use of alternatives leads to a significantly increased environmental impact of the product

Further discussion on this derogation will be conducted at 1st AHWG meeting in Seville.

⁵ Subtilisins (Protease), Human & Environmental Risk Assessment on ingredients of household cleaning products, Edition 2.0 February 2007. Available from: [http://www.heraproject.com/files/22-F-07_PROTEASE_HERA_Final%20Edition%20\(unsecured%20-%20PDF-A-1b\).pdf](http://www.heraproject.com/files/22-F-07_PROTEASE_HERA_Final%20Edition%20(unsecured%20-%20PDF-A-1b).pdf)

Assessment and verification

This has been updated to reflect the changes in Regulation (EC) No 1907/2006.

Consultation questions

- | | |
|---|---|
| 1 | Is it technically feasible to formulate APC products without enzymes classified H400? |
| 2 | Could the % limit for classified surfactants be lower? |

Current criterion 3d

(d) Substances listed in accordance with Article 59(1) of Regulation (EC) No 1907/2006

No derogation from the exclusion in Article 6(6) shall be given concerning substances identified as substances of very high concern and included in the list foreseen in Article 59 of Regulation (EC) No 1907/2006 present in mixtures in concentrations higher than 0.010 %.

Assessment and verification: the list of substances identified as substances of very high concern and included in the candidate list in accordance with Article 59 of Regulation (EC) No 1907/2006 can be found here:

http://echa.europa.eu/chem_data/authorisation_process/candidate_list_table_en.asp

Reference to the list shall be made on the date of application.

Concentration limits shall be specified in the safety data sheets in accordance with Article 31 Regulation (EC) No 1907/2006.

Proposal for criterion 3(c) – "Ingoing substances listed in accordance with Article 59(1) of Regulation (EC) No 1907/2006"

No derogation from the exclusion in Article 6(6) of Regulation (EC) No 66/2010 shall be given concerning ingoing substances identified as substances of very high concern and included in the list provided for in Article 59(1) of Regulation (EC) No 1907/2006⁶, present in the product in concentrations higher than 0.010 % (weight by weight).

Assessment and verification: *reference to the list of substances identified as substances of very high concern shall be made on the date of application. The applicant shall provide the full formulation of the product to the competent body. The applicant shall also provide a declaration of compliance with criterion 3(c), together with related documentation, such as declarations of compliance signed by the material suppliers and copies of relevant safety data sheets for substances or mixtures.*

Rationale and discussion

No content-wise changes are proposed. The text is proposed to be aligned with that of the corresponding criterion in the ROC criteria.

Current criterion 3e

e) Biocides

(i) The product may only include biocides in order to preserve the product, and in the appropriate dosage for

⁶ http://echa.europa.eu/chem_data/authorisation_process/candidate_list_table_en.asp

this purpose alone. This does not refer to surfactants, which may also have biocidal properties

(ii) It is prohibited to claim or suggest on the packaging or by any other communication that the product has an antimicrobial action

(iii) Biocides, either as part of the formulation or as part of any mixture included in the formulation, that are used to preserve the product and that are classified H410/R50-53 or H411/R51-53 in accordance with Directive 67/548/EEC, Directive 1999/45/EC of the European Parliament and of the Council (1) or Regulation (EC) No 1272/2008, are permitted but only if their bioaccumulation potentials are characterised by log Kow (log octanol/water partition coefficient) < 3.0 or an experimentally determined bioconcentration factor (BCF) ≤ 100.

Assessment and verification: the applicant shall provide copies of the material safety data sheets for all biocides, together with a documentation of the concentrations of the biocides in the final product.

Proposal for criterion 3(d) – "Preservatives"

(iv) The product may contain preservatives provided that they are not bioaccumulating. A preservative is not considered bioaccumulating if BCF < 100 or logPow < 3,0. If both BCF and log Kow values are available, the highest measured BCF value shall be used.

(v) Preservatives in the product shall not release or degrade to substances that are classified in accordance with the requirements of Criterion x(b) on hazardous substances and mixtures.

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

Assessment and verification: the applicant 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.

Rationale and discussion

Biocides are used in detergent products for preservation purposes. They prevent the product from spoiling during storage by preventing the growth of microorganisms. However, their use is also a cause for concern as they are highly toxic to aquatic organisms and can also produce hypersensitivity and allergies (for more information see Technical Annexe, Section 10.2.2).

In the current criteria the following changes are proposed:

- The name of sub-criterion is proposed to be changed to 'Preservatives'.
- The statement "Product may only include biocides in order to preserve the product, and in the appropriate dosage for this purpose alone. This does not refer to surfactants, which may also have biocidal properties" is proposed to be removed as competent bodies have mentioned during the revision of the EU Ecolabel for Rinse-Off Cosmetics that they cannot verify the compliance with this requirement.
- Finally, in the recent criteria developments it was pointed out that sometimes preservatives may release or degrade to substances that are even more hazardous than the preservatives used. Therefore an additional requirement is proposed for consideration: *Preservatives in the product shall not release or degrade to substances that classified in accordance with the requirements of criterion x(b) Hazardous substances and mixtures.*

Consultation questions

1	Do you agree with the changes proposed to requirement on preservatives?
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Proposal for criterion X(f) – Colorants NEW REQUIREMENT

Colorants in the product must not be bioaccumulating. A colorant is considered not bioaccumulating if $BCF < 100$ or $\log P_{ow} < 3,0$. If both BCF and $\log K_{ow}$ 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 bioaccumulation potential.

Assessment and verification: the applicant shall provide copies of the safety data sheets of any colorant added together with information on its BCF and/or $\log K_{ow}$ value, or documentation to ensure that the colouring agent is approved for use in food.

Rationale and discussion

The inclusion of this criterion is proposed in order to harmonise the different criteria sets.

For more information on colorants see Section 10.6 of the Technical Annexe.

Proposal for criterion X(g) – Enzymes NEW REQUIREMENT

Enzymes must be in liquid form or dust-free granulate. Enzymes must be free from micro-organism remnants from manufacture.

Assessment and verification: the applicant shall provide copies of the material safety data sheets of any enzyme added, together with documentation to ensure that the enzyme is free from micro-organism remnants.

Rationale and discussion

The inclusion of this criterion is proposed in order to harmonise the different criteria sets.

For more information on colorants see Section 10.2.4 of the Technical Annexe.

Consultation questions

1	Do you agree with the proposed requirements on colorants and enzymes?
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8.6 Criterion 4: Fragrances

Current criterion 4

- a) The product shall not contain perfumes containing nitro-musks or polycyclic musks (as specified in Criterion 3 (a)).
- b) Any substance added to the product as a fragrance must have been manufactured and/or handled in accordance with the code of practice of the International Fragrance Association. The code can be found on IFRA website: <http://www.ifraorg.org>
- c) Fragrance substances subject to the declaration requirement provided for in Regulation (EC) No 648/2004 (Annex VII) and which are not already excluded by Criterion 3(c) and (other) fragrance substances classified H317/R43 (May cause allergic skin reaction) and/or H334/R42 (May cause allergy or asthma symptoms or breathing difficulties if inhaled) shall not be present in quantities $\geq 0.010\%$ (≥ 100 ppm) per substance.

Assessment and verification: the applicant shall provide a declaration of compliance with each part of Criteria (a) and (b). For Criterion (c), the applicant shall provide a signed declaration of compliance indicating the amount of fragrances in the product. The applicant shall also provide a declaration from the fragrance manufacturer specifying the content of each of the substances in the fragrances which are listed in Annex III, Part I to Council Directive 76/768/EEC (12) as well as the content of (other) substances which have been assigned the risk phrases R43/H317 and/or R42/H334.

Proposal for criterion 3(e) – "Fragrances"

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

Assessment and verification: the applicant shall provide a signed declaration of compliance, supported by a declaration of the fragrance manufacturer, as appropriate.

Rationale and discussion

No content-wise change is proposed for this criterion. Three new exclusions of specific fragrances (HICC, atranol and chloroatranol) are proposed to be added and included in the sub-criterion (a) on specified excluded ingoing substances and mixtures, together with the exclusion on nitro-musks and polycyclic musks and fragrance substances subject to the declaration requirement provided for in Regulation (EC) No 648/2004 (Annex VII) and which are not already excluded by Criterion 3(c) and (other) fragrance substances classified H317/R43 (May cause allergic skin reaction) and/or H334/R42 (May cause allergy or asthma symptoms or breathing difficulties if inhaled) in quantities $\geq 0.010\%$ (≥ 100 ppm) per substance.

Background information on the criterion for fragrances is provided in Technical Annexe, Section 10.4.

- Update of the Directive 76/768/EEC (Cosmetics Directive) to Regulation (EC) No 1223/2009 (Cosmetic Regulation).

8.7 Criterion 5: Volatile organic compounds

Current criterion 5

The final products of all-purpose cleaners and sanitary cleaners (as sold) shall not contain more than 6 % (by weight) of volatile organic compounds with a boiling point lower than 150 °C. Alternatively, for concentrated products to be diluted in water, the total concentration of volatile organic compounds with a boiling point lower than 150 °C shall not exceed 0.2 % (by weight) in the washing water.

The final products of window cleaners (as sold) shall not contain more than 10 % (by weight) of volatile organic compounds with a boiling point lower than 150 °C.

Assessment and verification: the applicant shall provide copies of the material safety data sheets of each organic solvent together with details of the calculations of the total concentration of volatile organic compounds with a boiling point lower than 150 °C.

Proposed criterion 5

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

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

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

Rationale and discussion

Volatile organic compounds are released into the air from ingredients used in cleaning products, most commonly from solvents such as formaldehyde, limonene, acetone, ethanol and isopropyl alcohol. VOCs are of concern as indoor air pollutants and have the potential to impact the health of people that are exposed to them, for example when using a cleaning product. The health effects vary greatly from headaches and dizziness, to respiratory tract irritations and memory impairment. As a consequence, it is important to limit the use of these substances in cleaning products.

Clarification on the definition of volatile organic compound

It is not clear from previous revisions of this criterion how VOCs have been defined and characterised.

Directive 2001/81/EC of the European Parliament and of the Council of 23 October 2001 on national emission ceilings for certain atmospheric pollutants established that VOCs (volatile organic compounds) mean:

“...all organic compounds arising from human activities, other than methane, which are capable of producing photochemical oxidants by reactions with nitrogen oxides in the presence of sunlight.”

However, this document does not identify how they might also be characterised in terms of basic physical properties.

Other Directives and EU Ecolabel criteria have taken an approach which attempts to set limits on components by virtue of their vapour pressure at e.g. 25 °C, or a proxy for it such as a maximum

boiling point, but without explicit consideration of the photochemical behaviour. For example, the EU Ecolabel Criteria Document for indoor and outdoor paints defines VOCs as: ‘any organic compounds having an initial boiling point less than or equal to 250 °C measured at a standard pressure of 101,3 kPa as defined in Directive 2004/42/EC [the ‘Paints Directive’]⁷...’, and referencing additional analytical tests. The current criterion takes a significantly lower boiling point of 150 °C, which will substantially restrict the scope of compounds embraced by such a volatility test.

According to ISO16000-6, VOCs are defined as any organic compound whose boiling point is in the range from (50 °C to 100 °C) to (240 °C to 260 °C), corresponding to having saturation vapour pressures at 25 °C greater than 100 kPa. In the context of simplifying the criteria for applicants this appears ambiguous and self-contradictory, although the upper temperature limit is ostensibly the same as that of the Paints Directive. It should be noted that the ISO does define another range, VVOC (very VOC), of even more volatile compounds, essentially continuing the temperature range of interest to below 0 °C. A complete consideration of VOCs should therefore consider the VOC+VVOC content i.e. everything boiling below ca. 250 °C. A note to the definition in the ISO standard does admit that a vapour-pressure based definition is a practical and acceptable alternative.

On this basis, a simpler and more directly relevant definition (coupled with straightforward verification) is that provided by Good Environmental Choice Australia Ltd (2013⁸) as:

“...any organic compound (compound which contains carbon) with a vapour pressure greater than 0.01 kPa at 1 atm and 20°C...”

The vapour pressures under these conditions (essentially room temperature and pressure, the likely conditions of use) are routinely published on materials datasheets and so can be easily offered as evidence.

Stakeholders recommended that the definition outlined in ISO16000-6 and cited by the World Health Organisation (WHO) should be adopted for the EU Ecolabel. As noted above, this definition presents a number of complications as presented, including the analytical supporting evidence required for VVOC evaluation.

The definition of volatile organic compounds in ISO16000-6 intended for use indoors is different and this definition should be used in APC product category as these products are intended for indoor use only.

On the basis of simplicity and consistency, it is recommended that VOCs be taken to mean any organic compound and the Good Environmental Choice Australia Ltd criterion be adopted.

No changes to limits for existing products

There was no call from stakeholders to changes the VOC limits for the existing products (all-purpose cleaners, RTU and undiluted; sanitary cleaners, RTU; window cleaners, RTU). There are no other indications of regulation changes that might affect this criterion.

Limits for new product categories

As noted previously, in response to stakeholder comments, it is proposed to subcategorise to identify and assess:

- Sanitary cleaners, undiluted.
- Window cleaners, undiluted.
- Toilet (WC) cleaners, RTU.

Of these, a limit for undiluted sanitary cleaners can be set by reference to the existing terms of the criterion. Here, all-purpose and sanitary cleaners are handled identically, so undiluted sanitary cleaners would adopt a 0,2% VOC content as diluted in wash water. This is suggested within the criterion revision above.

The limit for undiluted window cleaners cannot be set with confidence although, by pro-rating to all-purpose cleaners, a level of 0,3% is suggested.

⁷ Directive 2004/42/CE of the European Parliament and of the Council of 21 April 2004 on the limitation of emissions of volatile organic compounds due to the use of organic solvents in certain paints and varnishes and vehicle refinishing products and amending Directive 1999/13/EC

⁸ Standard No: CPv2.2-2012 Environmental Performance Standard - Cleaning Products, issued 26 November 2013

Similarly, the limit for WC cleaners cannot be set with confidence although, since they are currently classified as sanitary cleaners, a level of 6% could set provisionally.

Consultation questions	
1	Is this definition of VOCs appropriate for the product category?
2	Are the proposed limits appropriate?

8.8 Criterion 6: Phosphorus

Current criterion 6

The total quantity of elemental phosphorous in the product shall be calculated on the basis of the dosage of the product recommended by the manufacturer for preparing 1 litre of washing water for cleaning of normally soiled surfaces (for products diluted in water prior to use) or per 100 g of product (for products used without dilution) taking into account all substances containing phosphorus (e.g. phosphates and phosphonates).

For all-purpose cleaners, which are diluted in water prior to use, the total phosphorus content (P) shall not exceed 0.02 g of the dosage of the product recommended by the manufacturer for 1 litre of washing water.

For all-purpose cleaners, which are used without dilution, the total phosphorus content (P) shall not exceed 0.2 g per 100 g of product.

For sanitary cleaners, the total phosphorus content (P) shall not exceed 1.0 g per 100 g of product.

Substances used in window cleaners must not contain phosphorus.

Assessment and verification: the applicant shall provide the exact formulation of the product to the competent body, together with the details of the calculations showing compliance with this Criterion.

Proposed criterion X(x) – "Phosphorus"

Phosphonates may be included in products intended for professional use but not exceeding concentrations on 0,5% by weight.

Assessment and verification: the applicant shall provide the exact formulation of the product to the competent body, together with the details of the calculations showing compliance with this Criterion.

Rationale and discussion

Phosphorus compounds, such as phosphates and phosphonates, are commonly used as builders in detergent-based products. Builders are chemical compounds that soften water and improve wash performance. However, phosphorus is a major contributor to eutrophication in water systems and therefore the use of phosphorus compounds in detergent products is being phased out in favour of lower impact alternatives. *Further information can be found in Technical Annexe section 10.1.1.*

Phosphorus compounds, commonly used in detergent products such as dishwasher detergents and laundry detergents are not particularly common in all-purpose cleaning products. Phosphorus compounds can be found in solid soap products, but in very small quantities and they are typically used in installations or buildings that are connected to municipal waste water systems.

The Detergents Regulation (648/2004/EC) has recently been revised and addresses the use of phosphates, limiting the use of phosphates and other phosphorous compounds in household detergents and setting an upper limit on phosphorous content of 0,5 g per dose for the main cycle of the wash process (laundry).

Comparing the restrictions of other ecolabelling schemes, it can be noted that most of them prohibit the use of phosphorus compounds in this product type. This is the case for the Nordic Swan, Good Environmental Choice and the Australian scheme. They set low limits for the content of phosphorus compounds allowed in the product, varying from 0,05 to 0,5% by weight. The New Zealand Environmental Choice scheme takes a slightly different approach, by allowing phosphates and phosphonates as long as they are aerobically biodegradable. These restrictions show that there are products on the market that are phosphorus free and provide a good cleaning performance, and therefore a stricter restriction is proposed for this criterion. The revised approach entails a ban for phosphates in all products covered by the EU Ecolabel for all-purpose cleaners and sanitary cleaners and a limit of 0,5% for phosphonates in professional products. This proposal is underpinned by the stakeholder consultation. The majority of the stakeholders thought that the current limits set for phosphorus compounds are not strict enough.

Consultation questions	
1	Should phosphates be banned from this product category?
2	Are phosphorus compounds used in this product group?
3	Do you agree with the proposal to allow phosphonates in professional products?
4	Should these requirements be merged with criterion 3(a) as in other detergent EU Ecolabel products?

8.9 Criterion 7: Packaging requirements

Current criterion 7

a) Sprays containing propellants must not be used.

Plastic materials that are used for the main container shall be marked in accordance with the European Parliament and Council Directive 94/62/EC of 20 December 1994 on packaging and packaging waste (1), or DIN 6120 Parts 1 and 2 in connection with DIN 7728 Part 1.

If the primary packaging is made of recycled material, any indication of this on the packaging shall be in conformity with the ISO 14021 standard 'Environmental labels and declarations – Self declared claims (type II environmental Labelling).

b) Products packaged in trigger sprays must be sold as a part of a refillable system.

c) Only phthalates that at the time of applications have been risk assessed and have not been classified according to criterion 3(c) may be used in the plastic packaging.

d) The weight utility ratio (WUR) of the primary packaging must not exceed the following values:

Product type	WUR
Concentrated products, including liquid concentrates and solids, that are diluted in water prior to use	1.20 gram packaging per litre use solution (washing water)
Ready-to-use products, i.e. products used without further dilution	150 gram packaging per litre use solution (washing water)

WUR is calculated only for the primary packaging (including caps, stoppers and hand pumps/spraying devices) by using the formula below:

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

Where

W_i = The weight (g) of the primary packaging (i) including label if applicable.

U_i = The weight (g) of non-recycled (virgin) material in the primary packaging (i). If the proportion of recycled material in the primary packaging is 0 %, then $U_i = W_i$.

D_i = The number of functional doses (= number of the dosage volume which is recommended by the manufacturer for 1 litre of washing water) contained in the primary packaging (i). In the case of ready-to-use products that are sold pre-diluted, D_i = product volume (in litres).

r_i = Recycling figure, i.e. the number of times the primary packaging (i) is used for the same purpose through a return or refill system ($r_i = 1$, if the packaging is not reused for the same purpose. If the packaging is reused, r_i is set to 1 unless the applicant can document a higher number.

Assessment and verification: the applicant shall provide a calculation of the WUR of the product to the competent body, together with a declaration of compliance with each part of this Criterion. For Criterion (e) the applicant shall provide completed and signed declaration of compliance.

Proposed criterion 7

d) 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.

e) Weight/utility ratio (WUR)

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
Undiluted products	1,2 g
RTU products	15,0 g
RTU products sold in bottles with trigger sprays	20,0 g

Are exempted from this requirement:

- Plastic/paper/cardboard packaging containing more than 80 % recycled materials,
- Paper/cardboard packaging that comes 80% from certified sustainable sources,
- Plastic packaging containing more than 80 % plastic from sustainable sources.

Assessment and verification: the applicant shall provide the calculation of the WUR of the product. A spreadsheet for this calculation is available on the EU Ecolabel website. 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.

The applicant shall provide a completed and signed declaration for the content of recycled material in the packaging.

- For paper and cardboard, 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.

- For plastic, packaging is regarded as recycled if the raw material used to make the packaging comes from industrial waste or has been collected from packaging manufacturer at the distribution or at the consumer stage.

The applicant shall provide a completed and signed declaration for the content of sustainably sourced material in the packaging. For paper and cardboard, the applicant shall provide TBD. For plastic, the applicant shall provide TBD.

The WUR is calculated as follows:

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

Where:

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

U_i : weight (g) of non-recycled and non-sustainably sourced 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.

f) Design for recycling

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 4. Pumps are exempted from this requirement.

Table 4: Materials and components excluded from packaging elements

Packaging element	Excluded materials and components ⁹
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)

⁹ EVA – Ethylene Vinyl Acetate, EVOH – Ethylene vinyl alcohol, HDPE – High-density polyethylene, PET – Polyethylene terephthalate, PETG – Polyethylene terephthalate glycol-modified, PP – Polypropylene, PS – Polystyrene, PVC – Polyvinylchloride

Closure	<ul style="list-style-type: none"> - PS closure in combination 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

Assessment and verification: The applicant shall submit a signed declaration of compliance specifying the material composition of the packaging including the container, label or sleeve, adhesives, closure and barrier coating, and a sample of primary packaging.

Rationale and discussion

From a life cycle perspective, packaging is not the most important environmental impact for all-purpose cleaners but can represent up to 36% of impact contribution for fossil depletion when plastic packaging is used¹⁰, for example. In the case of window cleaners, packaging has the largest environmental impact contribution overall¹¹. It is therefore proposed that a criterion on packaging is kept present in the EU Ecolabel for all-purpose cleaners and sanitary cleaners.

Further information on the wording of the proposed criterion and background information on packaging can be found in the Technical Annex Section 11.

a) Products sold in spray bottles

As spray nozzles are easily recyclable and require extra materials to manufacture, it is proposed to keep the requirement that products sold in spray bottles are sold part of a refillable system. To prove compliance with this requirement, the applicant should demonstrate that refills are available on the market for the product sold in the spray bottle.

b) Weight/Utility Ratio (WUR)

The way that WUR results are expressed has been changed as previously it did not use the reference dosage for RTU products, unlike the other criteria in this criteria set. Previously WUR for RTU products was calculated for a litre of solution which might have led to confusion; it is now expressed for the reference dosage of 100g of product.

During stakeholder consultation it was also pointed out that the current WUR requirements highly limit the ability of products sold in bottles with trigger sprays to be awarded with an EU Ecolabel, especially if they are sold in bottle sizes under 750ml, which is the case for many RTU products. Investigation of the issue showed that an average 750ml bottle weighs just under 39g and a 500ml bottle just under 34g. A trigger spray weighs around 24g (20g for one of the lightest on the market). If it is considered that the applicant cannot prove that the bottle equipped with a trigger spray will be reused, the WUR are as follows:

Bottle size	Weight	Trigger spray weight	WUR
500ml	34g	24g	23,2g
750ml	39g	24g	16,8g
1000ml	40g	24g	12,8g

Thus, with the current criteria limits, only the 1000ml bottle would pass the requirement with a documented use of 1. As it is difficult to prove that a bottle will be reused (even if refills are available on the market) for domestic products, it is proposed to increase the WUR requirement for RTU products sold in bottles with trigger sprays from 15,0g to 20,0g. This threshold is aligned with

¹⁰ Preliminary report for APCs <http://susproc.jrc.ec.europa.eu/detergents/stakeholders.html>

¹¹ AISE. 2013. Charter update 2010. Final version 1 October 2013. ASP substantiation dossier: Household trigger spray cleaners (glass/ window, bathroom, kitchen and all-purpose for hard surfaces)

the overall threshold required by Nordic Swan, but much higher than the threshold required by AISE's Charter for Sustainable Cleaning for trigger sprays (Table 9).

Table 9: Comparison of the proposed EU Ecolabel thresholds and those required by other ecolabels and other voluntary environmental schemes

Scheme	Proposed EU Ecolabel	Current EU Ecolabel	Nordic Swan	AISE Charter for Sustainable Cleaning	Env. Choice NZ
RTU*	15,0g (non-trigger sprays) 20,0g (trigger sprays)	15,0g	20,0g	14,0g (trigger sprays) 10,2g (toilet cleaners)	15,0g
Undiluted	1,2g	1,2g	1,2g	1,3g	N/A

* all thresholds have been brought to correspond to the reference dosages included in the proposed EU Ecolabel: 100g for RTU products and quantity recommended by the manufacturer for 1l of washing water for undiluted products

As part of the WUR calculations, the percentage of recycled and sustainably sourced packaging in the primary packaging is proposed to be taken into account by lowering the WUR. When this percentage is over 80%, it is proposed that the applicant shall be exempted from compliance with the WUR requirement.

Further information on this aspect can be found in the Technical Annex Section 11.3.1.

c) Design for recycling

In line with the EU Ecolabel on Rinse-off cosmetics, it is proposed to remove the requirement on the labelling of plastics parts but instead to promote the recyclability of packaging by avoiding combinations of incompatible materials and potential contaminants.

Further information on this aspect can be found in the Technical Annex Section 11.3.4.

Consultation questions	
1	Packaging is not one of the top 4 KPIs for the product groups concerned, should a criterion related to it be kept?
2	Are the WUR limits appropriate? Especially for trigger sprays.
3	Is the design for recycling requirement suitable for this product group?

8.10 Criterion 8: Fitness for use

Current criterion 8

The product shall be fit for use, meeting the needs of the consumers.

a) All-purpose cleaners and window cleaners

For all-purpose cleaners, only fat-removing effects must be documented. For window cleaners, stripe-less drying must be documented

The cleaning ability must be equivalent to or better than that of a market-leading or generic reference product, approved by a competent body.

Assessment and verification: the performance of the product must either be tested by:

- an adequate and justifiable laboratory test, or
- an adequate and justifiable consumer test.

Both tests 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/ecolabelled_products/categories/purpose_cleaners_en.htm

b) Sanitary cleaners

Sanitary cleaners include bathroom cleaners, toilet cleaners and kitchen cleaners. For bathroom cleaners, both limesoap and limescale removal shall be documented. For acidic toilet cleaners, only limescale removal shall be documented. For kitchen cleaners fat removing effects shall be documented.

The cleaning ability must be equivalent to or better than that of generic reference detergent specified below.

Assessment and verification: the performance of the product must either be tested by:

- an adequate and justifiable laboratory test, or
- an adequate and justifiable consumer test.

Both tests 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'. The generic reference detergent 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). The reference detergent is applicable for toilet cleaners and bathroom cleaners; however the pH must be reduced to 3.5 for the testing of bathroom cleaners.

The IKW performance test 'Recommendation for the quality assessment of acidic toilet cleaners' (SÖFW-Journal, 126, 11, pp. 50-56, 2000) can be downloaded from http://www.ikw.org/pdf/broschueren/EQ_WC_Reiniger_Englisch.pdf

Proposed criterion 8

The product shall be fit for use, meeting the needs of the consumers.

a) All-purpose cleaners and window cleaners

For all-purpose cleaners, only fat-removing effects must be documented. For window cleaners, stripe-less drying must be documented.

The cleaning ability must be equivalent to or better than that of a market-leading or generic reference product, approved by a competent body.

Assessment and verification: the performance of the product must either be tested by:

- an adequate and justifiable laboratory test, or
- an adequate and justifiable user test.

Both tests 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

b) Sanitary cleaners

Sanitary cleaners include bathroom cleaners, toilet cleaners and kitchen cleaners. For bathroom cleaners, both limesoap and limescale removal shall be documented. For acidic toilet cleaners, only limescale removal shall be documented. For kitchen cleaners fat removing effects and evaluation of burnt-on soil removal shall be documented.

The cleaning ability must be equivalent to or better than that of generic reference detergent specified below.

Assessment and verification: the performance of the product must either be tested by:

- an adequate and justifiable laboratory test, or
- an adequate and justifiable user test.

Both tests 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'. The generic reference detergent 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). The reference detergent is applicable for toilet cleaners and bathroom cleaners; however the pH must be reduced to 3.5 for the testing of bathroom cleaners.

The IKW performance test 'Recommendation for the quality assessment of acidic toilet cleaners' (SÖFW-Journal, 126, 11, pp. 50-56, 2000) can be downloaded from http://www.ikw.org/fileadmin/content/downloads/Haushaltspflege/HP_EQ-Allzweck-englisch.pdf

Rationale and discussion

No major changes are proposed for this criterion in this revision. During stakeholder consultation it has been suggested that kitchen cleaners can also be tested on their ability to remove burnt-on soil, this has been added as a proposal in the text. Another suggestion to update the testing protocols by increasing the number of repetitions to 20 in order to have a better view of the performance of the product. This suggestion has not been implemented in this revision and is proposed for discussion during the 1st AHWG meeting.

Updating to the links and methods has been introduced in the revision of the criterion. :

Consultation questions	
1	Should evaluation of burnt on soil removal be added as an additional requirement of the testing procedure for kitchen cleaners?
2	Should the number of repetitions required by the testing procedures be increased to 20, in line with HDDs?

8.11 Criterion 9: User instructions

Current criterion 9

a) Dosage instructions

Information on the recommended dosage of all-purpose cleaners and sanitary cleaners shall appear on the packaging in a reasonably sufficient size and against a visible background. In the case of a concentrated product, it shall be clearly indicated on the packaging that only a small quantity of the product is needed compared to normal (i.e. diluted) products.

The following text (or equivalent text) shall appear on the packaging: *'Proper dosage saves costs and minimises environmental impacts'*.

The following text (or equivalent text) shall appear on the packaging of ready-to-use all-purpose cleaners: *'The product is not intended for large-scale cleaning'*.

b) Safety advice

The following safety advice (or equivalent) shall appear on the product in text or as pictogram:

- 'Keep away from children',
- 'Do not mix different cleaners',
- 'Avoid inhaling sprayed product' (only for products that are packaged as sprays).

Assessment and verification: the applicant shall provide a sample of the product packaging, including the label to the competent body, together with a declaration of compliance with each part of this Criterion

Proposed criterion 9 – "User information"

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

a) dosing instructions

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

- For ready-to-use products: in ml or other relevant and well-known metric per application. The following text (or equivalent) shall appear on the packaging of ready-to-use products: *'The product is intended only for small or limited cleaning tasks. For extensive cleaning operations use a concentrated formulation.'*
- For undiluted products: in ml or other relevant and well-known metric per application, with instructions on dilution volumes.

The following text (or equivalent text) shall appear on packaging for all products: *"Proper dosage saves costs and minimises environmental impacts"*.

b) safety advice

The following safety advice (or equivalent) shall appear on the product in text or as pictogram:

- 'Keep away from children',
- 'Do not mix different cleaners',
- 'Avoid inhaling sprayed product' (only for products that are packaged as sprays).
-

c) resource saving measures

An indication on the primary packaging shall encourage users to use cold tap water, if applicable.

d) packaging disposal information

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

e) environmental information (voluntary)

The following text is recommended to appear on the primary packaging but its use is voluntary:
"All detergents have an effect on the environment. Always use the correct dose for maximum effectiveness, the lowest recommended temperature. This will minimize both energy and water consumption and reduce water pollution".

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

Rationale and discussion

Information appearing on the packaging provides useful information on how the user should use the product most effectively to achieve the best cleaning results whilst minimising the environmental impacts. The dosage instructions are an important requirement as they aim to prevent overdosing of the product. In terms of environmental performance of the product dosing is an important parameter as overdosing increases the environmental burden of the product through the unnecessary emission of chemicals. As such it is important that the requirements on product dosing are clear and easy to use. For concentrated products that require dilution prior to use, it is essential that it clearly states on the label/product information sheet how the product is to be diluted. As incorrect dosage of concentrated products can easily lead to overdosing. This is already emphasised in the current dosing instructions through the phrase *"Proper dosage saves costs and minimises environmental impacts"*. No further additions to the dosage instructions for APCs are required.

Rewording of text on dosage instructions

In response to the consultation, stakeholders commented that the phrase 'this product is not intended for large scale cleaning' was confusing and lost its original meaning when translated into other languages. Consequently an alternative wording has been proposed:

"The product is intended only for small or limited cleaning tasks. For extensive cleaning operations use a concentrated formulation."

The aim of this label is to signify to users that a concentrated product instead of a ready-to-use one should be employed if the cleaning task is extensive.

Consultation questions

1	Is the proposed wording clear and an improvement?
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8.12 Criterion 10: Information appearing on the EU Ecolabel

Current criterion 10

Optional label with text box shall contain the following text:

- ‘— reduced impact on aquatic life,
- reduced use of hazardous substances,
- reduced packaging waste,
- clear user instructions.’

The guidelines for the use of the optional label with text box can be found in the ‘Guidelines for the use of the EU Ecolabel logo’ on the website: http://ec.europa.eu/environment/ecolabel/promo/logos_en.htm

Assessment and verification: the applicant shall provide a sample of the label, together with a declaration of compliance with this Criterion.

Proposed criterion 10

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

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

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

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

Rationale and discussion

Information on the harmonised text for the Criterion on Information appearing on the EU Ecolabel can be found in Section 14 of the Technical Annex.

Consultation questions

- | | |
|---|--|
| 1 | Are the proposed statements suitable, illustrative of claims and an improvement? |
|---|--|

8.13 Criterion 11: Professional training

Current criterion 11

For detergents, which are used by professional users, the producer, its distributor or a third party shall offer training or training materials for cleaning staff. These shall include step-by-step instructions for proper dilution, use, disposal and the use of equipment.

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

Proposed criterion 11

a) alternative 1: (to be discussed during the 1st AHWG meeting)

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

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

b) alternative 2: (to be discussed during the 1st AHWG meeting)

[withdraw the criteria](#)

Rationale and discussion

During stakeholder consultation, contradictory information was obtained on the subject of product information sheets. For this reason, two alternatives are considered for discussion. In the first alternative, a sentence has been added as some products users may benefit from additional instructions which cannot fit on the product label. As the use phase of the product can have a significant impact on the overall environmental profile of the product, in particular with regard to the use of warm water, it is proposed that a product information sheet should be provided for professional users.

In the second alternative, withdraw of the criterion is proposed. The reasons behind are that this criterion does not bring additional environmental benefits to the product itself and that the training is proposed to be included in other schemes such as EU Ecolabel for cleaning services or GPP for cleaning services.

Consultation questions

1	Are product information sheets useful for training purposes?
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8.14 Criterion NEW - Sustainable sourcing of palm oil, palm kernel oil and their derivatives

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

Rationale and discussion

Further information on this criterion can be found in Section 15 of the Technical Annex.

9 APPENDIX

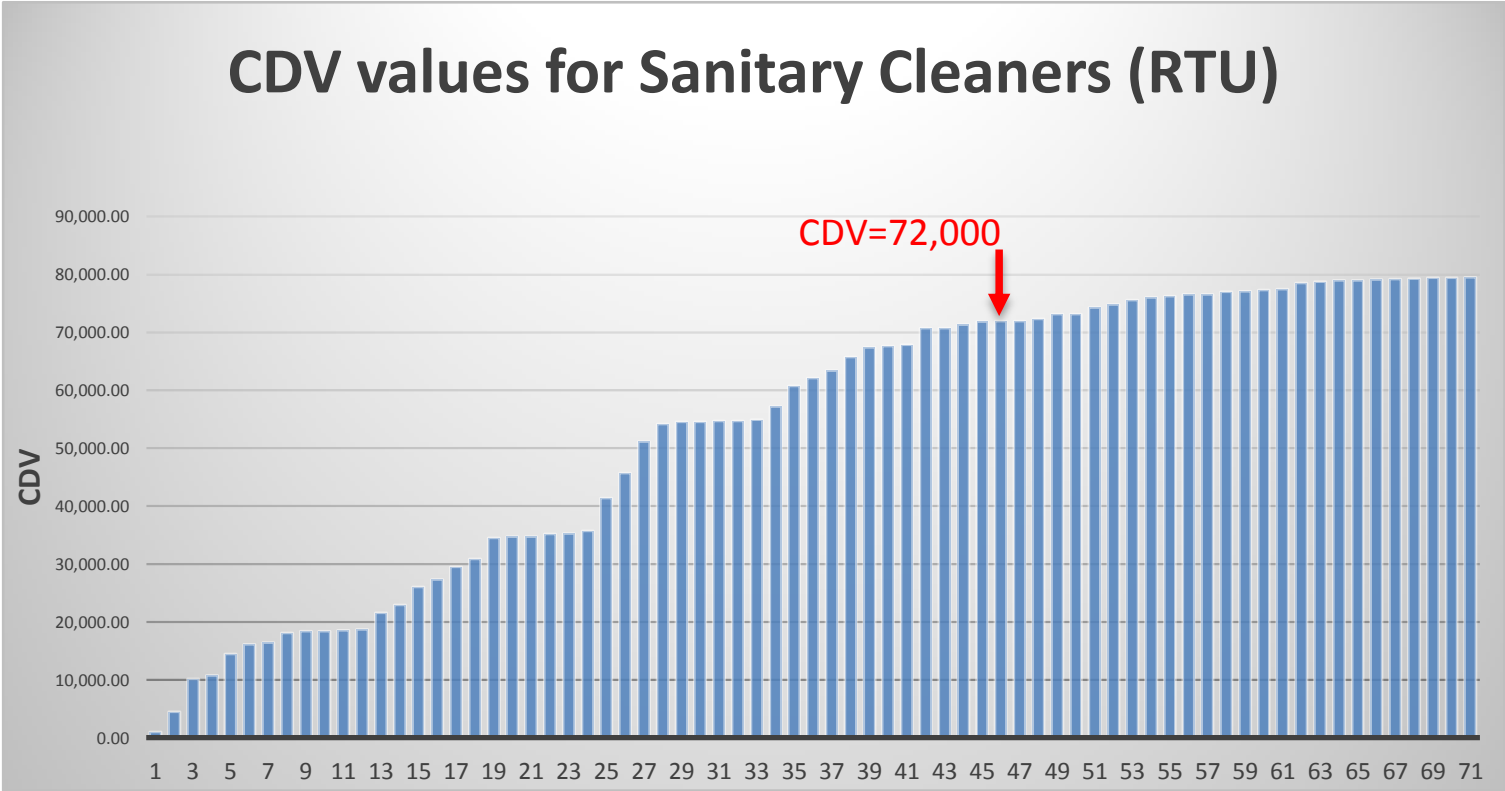


Figure 2: CVD values for recorded EU Ecolabel applications in the sanitary cleaners (RTU) category

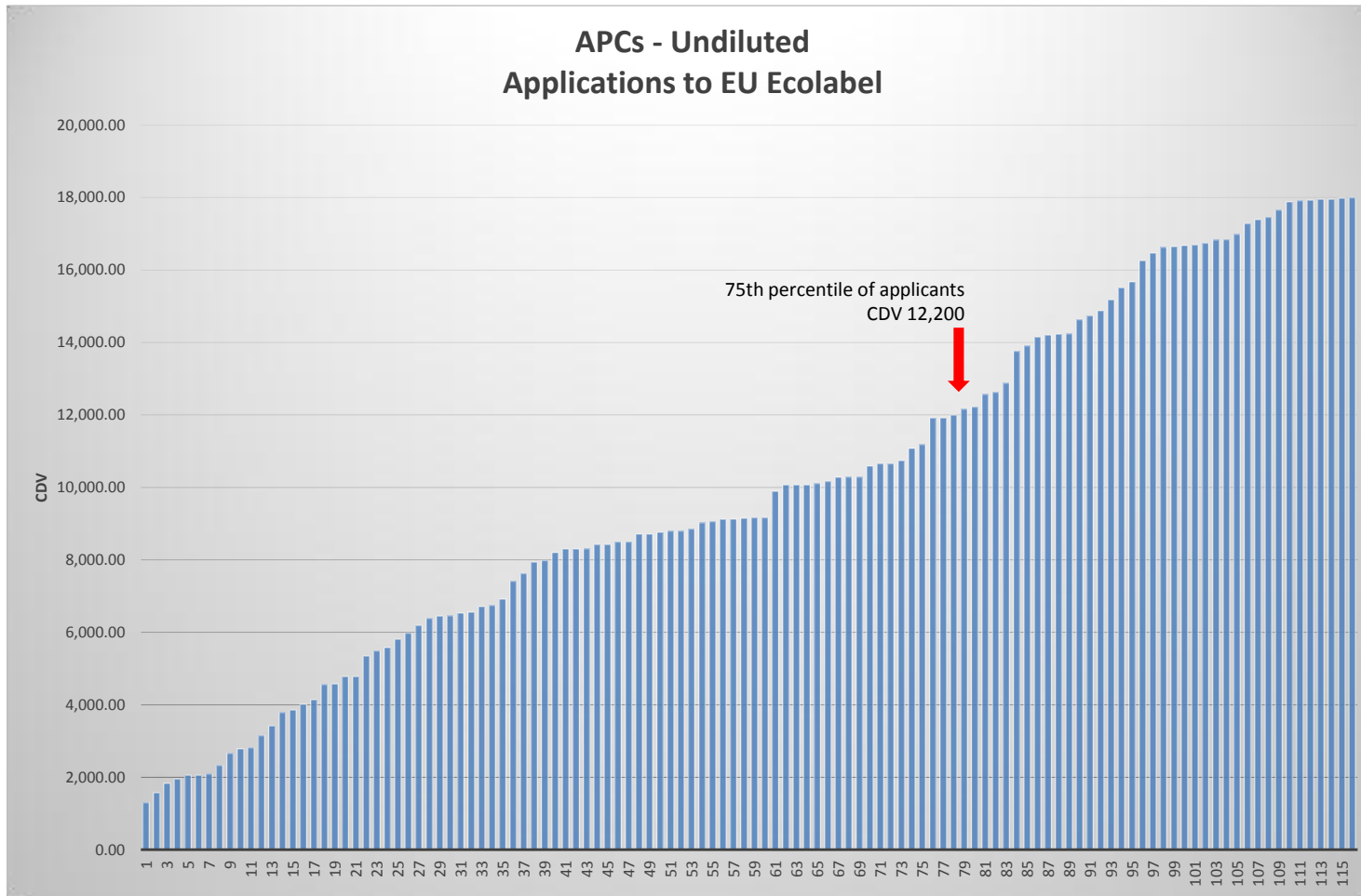


Figure 3: CDV values for recorded EU Ecolabel applications in the category All-Purpose Cleaners - Concentrated

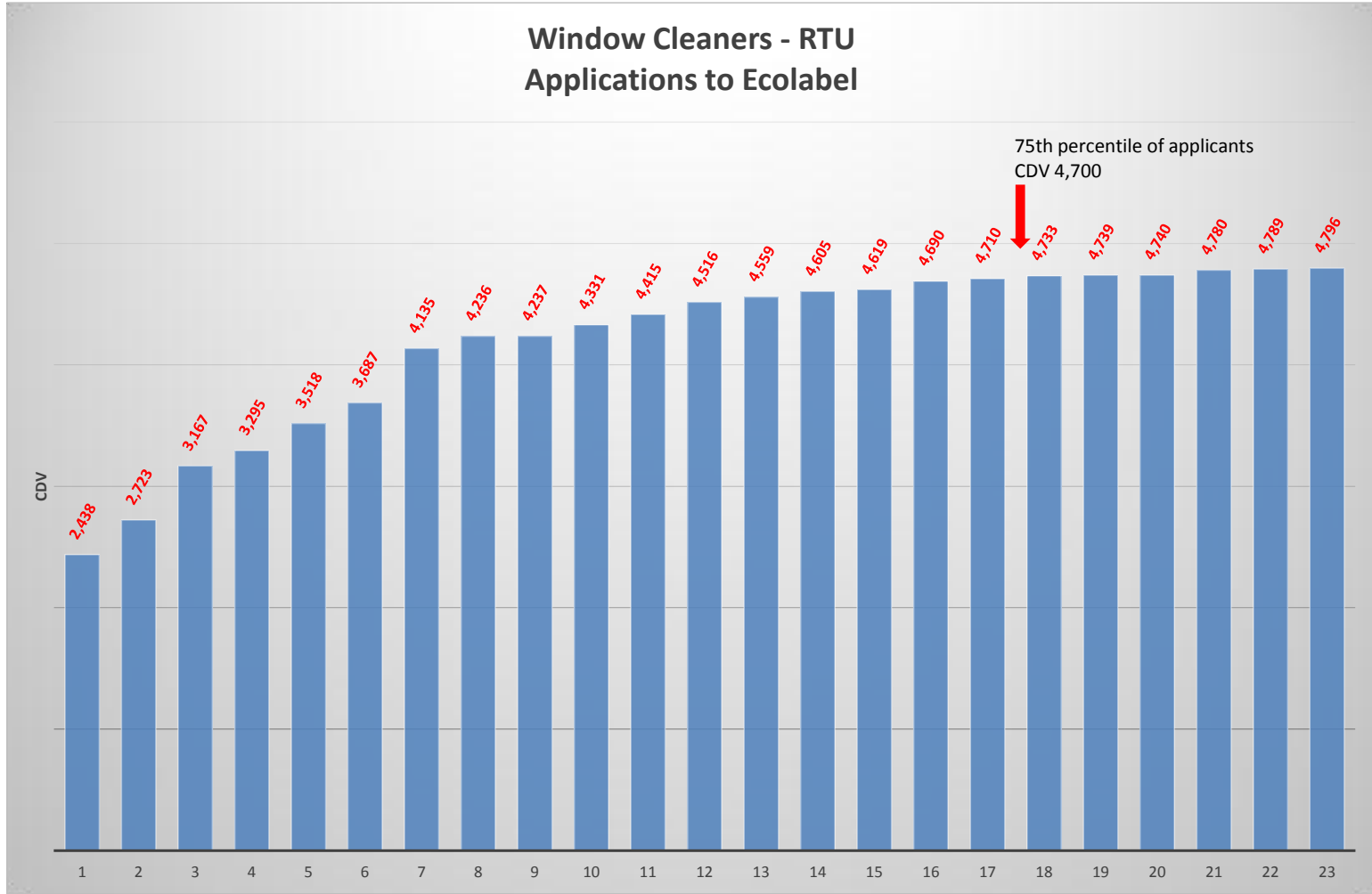


Figure 4: CDV values for recorded EU Ecolabel applications in the category Window Cleaners