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To:	General Secretariat of the Council
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Subject:	ANNEX to the COMMISSION DECISION of XXX establishing the EU Ecolabel criteria for dishwasher detergents, hand dishwashing detergents, industrial and institutional dishwasher detergents, laundry detergents, industrial and institutional laundry detergents and hard surface cleaning products and repealing Decisions (EU) 2017/1216, (EU) 2017/1214, (EU) 2017/1215, (EU) 2017/1218, (EU) 2017/1219 and (EU) 2017/1217

Delegations will find attached document D115591/3 - Annex II.

Encl.: D115591/3 - Annex II

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ANNEX II

EU Ecolabel criteria for awarding the EU Ecolabel to hand dishwashing detergents

CRITERIA

1. Toxicity to aquatic organisms
2. Biodegradability
3. Sustainable sourcing of palm oil, palm kernel oil and their derivatives
4. Excluded and restricted substances
5. Packaging
6. Fitness for use
7. User information
8. Information appearing on the EU Ecolabel

The EU Ecolabel criteria target the best detergent and cleaning products on the market, in terms of environmental performance. The criteria focus on the main environmental impacts associated with the life cycle of these products and promote circular economy aspects.

(a) Assessment and verification requirements

For the EU Ecolabel to be awarded to a specific product, the product shall comply with each requirement. The applicant shall provide written confirmation stating that all the criteria are fulfilled.

Specific assessment and verification requirements are indicated within each criterion.

Supporting documentation, including user manual, to help applicants apply for the EU Ecolabel award shall be made available on the EU Ecolabel website.

Where the applicant is required to provide declarations, documentation, analyses, test report, or other evidence to demonstrate compliance with the criteria, these may originate from the applicant, the applicant's supplier(s) and/or their supplier(s).

Competent bodies shall preferentially recognise attestations issued by bodies accredited according to relevant harmonised standard for testing and calibration laboratories and verifications by bodies accredited according to relevant harmonised standard for bodies certifying products, processes and services.

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 or on-site inspections to check compliance with these criteria.

Changes in suppliers and production sites pertaining to products to which the EU Ecolabel has been granted shall be notified by EU Ecolabel license holders to the competent bodies before

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their implementation, together with supporting information to enable verification of continued compliance with the criteria.

As a prerequisite, the product shall meet all applicable legal requirements of the country or countries in which the product is intended to be placed on the market. The applicant shall declare the product's compliance with this requirement.

The 'Detergent ingredient database' list (DID list) Part A and Part B, available on the EU Ecolabel website, contain information about the most widely used ingoing substances in detergents and cosmetics formulations. The DID list Part A, shall be used for sourcing the data for the calculations of the critical dilution volume (CDV) and for the assessment of the biodegradability of the ingoing substances. For substances not present on the DID list Part A, guidance is given in the DID list Part B on how to calculate or extrapolate the relevant data. The latest version of the DID list Part A and Part B are available from the EU Ecolabel website or via the websites of the individual competent bodies.

With regards to 'impurities' verification, the following shall be considered:

(a) the impurity limit, as set by the 'impurities' definition, applies separately to each individual excluded substance, from each individual raw material;

(b) the concentrations of an individual impurity originating from different raw materials shall not be summed.

The following information shall be provided together with the application for the EU Ecolabel.

(a) the list of all ingoing substances, indicating the trade name if applicable, the chemical name, the CAS No and/or the EC No, the DID No if applicable, its function, form and concentration in mass percentage regardless of concentration in the final product formulation; for polymers, the CAS No and/or EC No of their monomers;

(b) all ingoing substances present in the form of nanomaterials clearly indicated on the list with the word 'nano' written in brackets;

(c) for each ingoing substance listed, the safety data sheets (SDSs) in accordance with Regulation (EC) No 1907/2006 shall be provided. Where an SDS is not available for an individual substance because it is part of a mixture, the applicant shall provide the SDS of the mixture;

(d) any other information associated with the production of ingredients and materials that is necessary for demonstrating compliance with the EU Ecolabel criteria to be provided by the suppliers or producers of those ingredients and materials.

(b) Measurement thresholds

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

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Table 1. Threshold levels applicable to ingoing substances by criterion (% weight by weight [w/w])

Criterion name		**Surfactants**	**Preservatives**	**Colouring agents**	**Fragrances**	**Other (for example enzymes)**
Toxicity to aquatic organisms		≥ 0,010	LOD (*)	LOD (*)	LOD (*)	≥ 0,010
Biodegradability	Surfactants	≥ 0,010	n/a	n/a	n/a	n/a
	Films	≥ 0,010	LOD (*)	LOD (*)	LOD (*)	≥ 0,010
	Other organic compounds	≥ 0,010	LOD (*)	LOD (*)	LOD (*)	≥ 0,010
Sustainable sourcing of palm oil, palm kernel oil and their derivatives		≥ 1	n/a	n/a	n/a	≥ 1
Excluded and restricted substances	Restrictions on substances of very high concern (SVHCs)	LOD (*)	LOD (*)	LOD (*)	LOD (*)	LOD (*)
	General restrictions based on classifications in accordance with Regulation (EC) No 1272/2008	≥ 0,010	≥ 0,010	≥ 0,010	≥ 0,010	≥ 0,010
	Specific hazardous substances exclusions and restrictions	LOD (*)	LOD (*)	LOD (*)	LOD (*)	LOD (*)
	Other specific restrictions					
	(a) Total P	LOD (*)	LOD (*)	LOD (*)	LOD (*)	LOD (*)
	(b) Preservatives	n/a	LOD (*)	n/a	n/a	n/a
	(c) Colouring agents	n/a	n/a	LOD (*)	n/a	n/a
	(d) Enzymes	n/a	n/a	n/a	n/a	LOD (*)
	(e) Fragrances	n/a	n/a	n/a	LOD (*)	n/a
	(f) Corrosive properties	≥ 0,010	≥ 0,010	≥ 0,010	≥ 0,010	≥ 0,010

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	(g) Micro-organisms	n/a	n/a	n/a	n/a	LOD (*)

(*) 'LOD' means: no presence of ingoing substances above the limit of detection (LOD) with the exception of impurities, which may be present up to a concentration below 0,010 % w/w (100 ppm, 100 mg/kg) in the final formulation.

n/a not applicable

REFERENCE DOSAGE

Unless indicated otherwise in an EU Ecolabel (sub-)criterion, the following dosage shall be taken as the reference dosage for the calculations aiming at documenting compliance with the EU Ecolabel criteria and for testing product performance.

The highest dosage (indicated in g/l of washing water or ml/l of washing water) recommended by the manufacturer for 1 litre of washing water for cleaning normally soiled dishes.

Assessment and verification

The applicant shall provide the product label, user instruction sheet or equivalent that includes the dosing instructions.

Criterion 1. Toxicity to aquatic organisms

The critical dilution volume ($CDV_{chronic}$) of the product shall not exceed the following limits for the reference dosage.

Product type	**CDV limit (l/l of washing water)**
Hand dishwashing detergents	1 250

Assessment and verification

To demonstrate compliance with the *toxicity to aquatic organisms* criterion requirements, the applicant shall provide the calculation of the $CDV_{chronic}$ of the product. A spreadsheet is available on the EU Ecolabel website to help applicants demonstrate compliance with the requirements set in this criterion (i.e. the $CDV_{chronic}$ calculation).

The $CDV_{chronic}$ is calculated for all ingoing substances (i) in the product, except abrasives (if applicable), using the following equation:

$$\mathrm{CDVchronic} = \sum \mathrm{CDV}(i) = 1000 \,.\, \sum \mathrm{dosage}(i) \,.\, \frac{\mathrm{DF}(i)}{\mathrm{TFchronic}(i)}$$

Where:

$\mathrm{dosage}(i)$: weight (g) of the substance (i) in the reference dose;

$\mathrm{DF}(i)$: degradation factor for the substance (i);

$\mathrm{TF}_{\mathrm{chronic}}(i)$: chronic toxicity factor for the substance (i);

Reference shall be made to the most updated DID list, Part A and Part B, as follows:

(a) for ingoing substances that are included in the DID list, Part A, the applicant shall preferentially use and provide the degradation and aquatic toxicity factors (i.e. the values

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$\mathrm{DF}(i)$ and $\mathrm{TF}_{chronic}(i)$) as disclosed in the DID list, Part A, and as described in the DID list, Part B.

(b) for ingoing substances that are not included in the DID list, Part A, the applicant shall estimate the degradation and aquatic toxicity factors ($\mathrm{DF}(i)$ and $\mathrm{TF}_{chronic}(i)$) and it shall provide the relevant information from literature or other sources, or appropriate relevant test results from relevant European or international standards or an equivalent method, (for example testing and/or structure analogies*)* as described in the DID list, Part B.

Where points (a) and (b) are not possible, the *worst-case* approach, as per DID list, Part B, shall be applied, which implies the use of the following parameters:

(i) *acute toxicity*: lethal concentration 50 (LC50) / effective concentration (EC50) = 1 mg/l; safety factor $(\mathrm{SF})_{\mathrm{acute}}$ = 10 000; toxicity factor $(\mathrm{TF})_{\mathrm{acute}}$ = 0,0001;

(ii) *chronic toxicity*: no observed effect concentration (NOEC) = *; $\mathrm{SF}_{\mathrm{chronic}}$ = *; $\mathrm{TF}_{\mathrm{chronic}}$ = 0,0001; where '*' means 'if no acceptable chronic toxicity data are found, $\mathrm{TF}_{\mathrm{chronic}}$ is defined as equal to $\mathrm{TF}_{\mathrm{acute}}$';

(iii) *degradation:* degradation factor (DF) = 1; aerobic = persistent (P); anaerobic = anaerobically not biodegradable (N).

The applicant shall provide a declaration of compliance for the *toxicity to aquatic organisms* criterion, which shall be supported as follows:

(a) if ingoing substances are in the DID list, Part A, by documentation showing the $\mathrm{CDV}_{\mathrm{chronic}}$ calculations and the DID list entry associated with each ingoing substance (for example EU Ecolabel spreadsheet);

(b) if ingoing substances are not in the DID list, Part A, by documentation showing the $\mathrm{CDV}_{\mathrm{chronic}}$ calculations and the estimated degradation and toxicity factors ($\mathrm{DF}(i)$ and $\mathrm{TF}_{chronic}(i)$). The following verifications means could be accepted to estimate the degradation and aquatic toxicity factors:

(i) SDSs containing relevant information;

(ii) declaration from the ingredient supplier on the required information;

(iii) copies of test reports according to relevant European or international standards or an equivalent method (as accepted by the corresponding Competent Body) and any other documentation containing relevant information (for example QSARs results; literature findings) to estimate the values of the required parameters (i.e. $\mathrm{DF}(i)$, $\mathrm{TF}_{\mathrm{chronic}}$ (i)).

In the absence of the $\mathrm{CDV}_{\mathrm{chronic}}$ calculations, their associated degradation and aquatic toxicity factors or their associated verifications means, the *worst-case* approach shall be applied.

Criterion 2. Biodegradability

(a) Biodegradability of surfactants

All surfactants shall be biodegradable under both aerobic conditions (readily biodegradable) and anaerobic conditions.

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Aerobic biodegradation (*ready biodegradation*) shall be demonstrated by relevant European or international standards or an equivalent method for measuring mineralisation that have a duration of up to 28 days and a pass level of ≥60 % (theoretical oxygen demand (ThOD), theoretical carbon dioxide ($ThCO_2$) or theoretical maximum inorganic carbon (ThIC)), or ≥70 % removal of dissolved organic carbon (DOC).

Anaerobic biodegradation shall be demonstrated by relevant European or international standards or an equivalent method measuring mineralisation with duration of up to 60 days and a pass level of ≥60 %.

Complementary to the analytical testing as laid down in paragraphs second and third of this sub-criterion *(a) biodegradability of surfactants* and following the DID list, Part B, alternative methods (for example simulation studies; QSARs) and evidence (for example literature, QSARs) may be used to show aerobic and anaerobic biodegradation, respectively.

(b) Biodegradability of films

All organic ingoing substances within each film shall be aerobically biodegradable.

Aerobic biodegradation shall be demonstrated in any of the following ways:

(i) as indicated in sub-criterion *(a) Biodegradability of surfactants*;

(ii) via enhanced biodegradation tests performed as modifications to relevant European or international standards or an equivalent method (for example the extending duration up to 60 days) that have a pass level of ≥60 % (ThOD, $ThCO_2$ or ThIC) or ≥70 % removal of DOC;

(iii) if appropriate to the nature of the ingoing substance tested, as indicated in relevant European or international standards or an equivalent method that are tailored to miscible and water-soluble polymeric compounds (for example biodegradation of polymers in aquatic environments) and that have a pass level of ≥60 % (ThOD; $ThCO_2$);

(iv) in accordance with *Part B Films and polymers within films* of Annex I to Regulation (EU) 2026/405 once the corresponding delegated act referred to in its Article 30(4) starts to apply.

Complementary to the analytical testing as laid down in the second paragraph of this sub-criterion *(b) biodegradability of films* and in accordance with the DID list, Part B, alternative methods (for example simulation studies; QSARs) and evidence (for example literature, QSARs) may be used to show aerobic biodegradation.

(c) Biodegradability of other organic compounds

Aerobic (*ready biodegradation*) and anaerobic biodegradation shall be demonstrated as indicated in sub-criterion *(a) biodegradability of surfactants*.

Complementary to the analytical testing as laid down in paragraphs second and third of the sub-criterion *(a) biodegradability of surfactants* and in accordance with the DID list, Part B, alternative methods (for example simulation studies; QSARs) and evidence (for example literature, QSARs) may be used to show aerobic and anaerobic biodegradation, respectively.

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

Product type	**aNBO (g/l of washing water)**	**anNBO (g/l of washing water)**
Hand dishwashing detergents	0,01	0,02

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Assessment and verification

To demonstrate compliance with the *biodegradability* criterion requirements, as laid down in sub-criteria (a), (b) and (c), reference shall be made to the most updated DID List, Part A, and Part B, as follows:

(a) for organic ingoing substances that are included in the DID list, Part A, the applicant shall preferentially use and provide the biodegradability data (i.e. the values under 'aerobic' and 'anaerobic') as disclosed in the DID list, part A, and as described in the DID list, Part B;

(b) for organic ingoing substances that are not included in the DID list, Part A, the applicant shall provide the relevant information from literature or other sources, or appropriate relevant test results from relevant European or international standards or an equivalent method, showing that they are aerobically and/or anaerobically biodegradable (for example testing and/or structure analogies), in accordance to the DID list, Part B.

Where points (a) and (b) are not possible, the *worst-case* approach, in accordance with the DID list, Part B, shall be applied, which implies the use of the following parameters:

(i) *degradation factor* (DF) = 1;

(ii) *aerobic* = persistent (P);

(iii) *anaerobic* = non-biodegradable (N).

A spreadsheet is available on the EU Ecolabel website to help applicants demonstrate compliance with the requirements set in this criterion (for example aNBO and anNBO values calculation).

The applicant shall provide a declaration of compliance for each part of the *biodegradability* criterion, as laid down in sub-criteria (a), (b) and (c), or a justification of the non-applicability. The declaration of compliance shall be supported as follows:

(a) if organic ingoing substances are in the DID list, Part A, by documentation showing the aNBO and anNBO calculations and the DID list, Part A, entry and biodegradability data (i.e. the values under 'aerobic' and 'anaerobic') associated with each ingoing substance (for example EU Ecolabel spreadsheet);

(b) if organic ingoing substances are not in the DID list, Part A, by documentation showing the aNBO and anNBO calculations and the estimated biodegradability data (i.e. the values under 'aerobic' and 'anaerobic') associated with each ingoing substance. The following verification means could be accepted to estimate the biodegradability data:

(i) SDSs containing relevant information;

(ii) declaration from the ingredient supplier on the required information;

(iii) copies of test reports according to relevant European or international standards or an equivalent method (as accepted by the corresponding competent body) and any other documentation containing relevant information (for example QSARs results; literature findings) to estimate the values of the required parameters ('aerobic' and 'anaerobic').

In the absence of the aNBO or anNBO calculations, their associated biodegradability data or their associated verifications means, the *worst-case* approach shall be applied.

In addition, the following specific verification requirements apply:

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Related to sub-criterion *(b) biodegradability of films*

The applicant shall provide the full list of the ingoing substances composing each film. For each organic ingoing substance within a film, compliance shall be demonstrated as indicated above (i.e. preferentially by using the DID list, Part A or (failing this) Part B, or by providing a declaration of compliance supported by respective relevant documentation).

If it is not possible to demonstrate that every organic ingoing substances within a film is aerobically biodegradable, an alternative approach may be used by which all substances within a film can be deemed as aerobically biodegradable for the purposes of compliance with sub-criterion *(b) biodegradability of films* if:

(i) the film is the subject of the test; and

(ii) this test is deemed as a relevant European or international standard or an equivalent method according to the corresponding competent body; and

(iii) the test is passed according to the pass levels as laid down in the second paragraph of sub-criterion *(b)*.

For organic ingoing substances in the film that are tested as laid down in sub-criterion (b), second paragraph, point (iii), the testing documentation must also include the carbon balance calculations and the total degree of biodegradation results.

For organic ingoing substances in the film that are tested as laid down in sub-criterion (b), second paragraph, point (iv), the verification documentation accepted in accordance with Regulation (EU) 2026/405 (for example – test reports) shall also be accepted as verification mean for the purposes of compliance with sub-criterion *(b) biodegradability of films.*

Related to sub-criterion *(c) biodegradability of other organic compounds*

The applicant shall provide the calculation of aNBO and anNBO for the product.

In the absence of the documentation for biodegradability described above, an ingoing substance other than a surfactant may be exempted from the requirement for anaerobic biodegradability if it is not toxic to aquatic organisms (NOEC/EC_x > 0,1 mg/l or LC50/EC50/IC50 > 10 mg/l) and if one of the following three alternatives is fulfilled:

(1) it is readily degradable and has low adsorption (A<25 %); or

(2) it is readily degradable and has high desorption (D>75 %); or

(3) it is readily degradable and non-bio-accumulating.

Testing for adsorption/desorption shall be conducted according to relevant European or international standards or an equivalent method for predicting the desorption/adsorption behaviour of a chemical on different soil types, in order to obtain a sorption value which can be used to predict partitioning under different environmental conditions.

A substance is considered to be non-bio-accumulating if the bioconcentration factor (BCF) is < 100 or the logarithm of the octanol – water partition (log K_{ow}) is < 3,0.

Where relevant, values for BCF and log K_{ow} shall be based on the SDS, the ECHA CHEM database or shall be determined directly by the ingredient supplier (values derived from experimental testing or calculation), considering the following hierarchy:

(1) the BCF and log K_{ow} values shall preferentially be derived from the SDS provided by the ingoing substance producer;

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(2) if the SDS is not available, the BCF and log K_{ow} values shall be based on a reference to the values of the same substance in the ECHA CHEM database;

(3) if neither the SDS nor the ECHA CHEM database values are available, a direct determination of the BCF and log K_{ow} values shall be provided, considering that:

(i) where both the experimental BCF and the log K_{ow} values are available, the experimental BCF value shall be preferred,

(ii) where both the experimental and calculated log K_{ow} values are available, the experimental log K_{ow} value shall be preferred.

Where the BCF and log K_{ow} values are obtained from experimental testing:

(a) the BCF value shall be determined in accordance with relevant European or international standards or an equivalent method used to characterise the bioconcentration potential of substances tested in model organisms (for example fish) using aqueous exposure;
(b) the log K_{ow} value shall be determined in accordance with relevant European or international standards or an equivalent method used to determine the ratio of the equilibrium concentrations of a dissolved substance in two solvent phases that are immiscible and are kept at constant temperature (25 °C).

Where it is not possible to determine the BCF or log K_{ow} values directly, the applicant shall provide the relevant information from literature or other sources as part of a weight-of-evidence approach.

Where multiple BCF or log K_{ow} values are available, an explanation of why the value chosen is the most representative one shall be provided in the declaration. Failing this, the highest valid value shall take precedence.

Criterion 3. Sustainable sourcing of palm oil, palm kernel oil and derivatives

In the specific case of renewable ingredients representing ≥ 1 % (w/w) in the final product that originate from palm oil or palm kernel oil, or are derived from palm oil or palm kernel oil, the entirety of the renewable ingredients used shall meet the requirements of a certification scheme for sustainable production that:

(i) is based on multi-stakeholder organisations;

(ii) has a broad membership and a global geographical scope, including palm oil producers, processors and traders, retailers, consumer goods manufacturers, environmental and social NGOs and investors;

(iii) addresses environmental impacts, including impacts on land use change, soil organic carbon stocks, biodiversity and conservation of natural resources, as well as social impacts and impacts on human rights, including impacts on workers and local communities.

Assessment and verification

To demonstrate compliance, evidence shall be provided through third-party supply chain certificates guaranteeing that the palm oil and palm kernel oil used in the product or in its manufacturing originate from sustainably managed plantations.

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To be valid, the certification scheme shall demonstrate the following aspects:

(i) the sustainable cultivation of oil palms and the production of sustainable palm oil and oil palm products worldwide on the basis of a set of principles, criteria and indicators including indicators for carbon stock, biodiversity, security of natural resources (land, food and water), restricted use of pesticides and respect of labour rights;

(ii) the implementation by organisations in the palm value chain, of systems ensuring the downstream chain of custody of the palm oil and oil palm products produced and sold as certified, according to the following models:

(1) for palm oil, 'identity preserved' and 'segregated' chain of custody models shall be accepted as valid chain of custody models for compliance with this EU Ecolabel criterion. The 'mass balance' model (which allows for mixing of certified and non-certified palm oil at any stage in the supply chain provided that overall site quantities are controlled) and the 'book and claim' model shall not be accepted;

(2) for palm kernel oil, and palm oil and palm kernel oil derivatives, 'identity preserved', 'segregated' and mass balance chain of custody models shall be accepted as valid chain of custody model for compliance with this EU Ecolabel criterion. Certificates using 'book and claim' model shall not be accepted.

During the first application, the applicant shall provide a valid supply chain certificate for all the facilities where the products for which the EU Ecolabel is requested are produced, including the number of the certificate, or the membership number given to the applicant by the certification organisation.

Alternatively, the applicant shall provide, for each relevant ingredient, during the first application, a valid supply chain certificate that includes the number of the certificate or the membership number given to the raw material producer by the certification organisation. In this case, a mass balance calculation and/or invoices/delivery notes from the raw material producer that include the correct number of the certificate on an annual basis shall be provided to demonstrate that the proportion of certified raw material corresponds to the amount of certified palm oil, palm kernel oil and/or their derivatives. Alternatively, a certificate of analysis with the correct number of the certificate or a declaration from the producer of raw materials shall be provided to demonstrate that all purchased palm oil, palm kernel oil and/or their derivatives are certified according to one of the valid chain of custody models.

The supply chain certificates shall be valid for the whole duration of the EU Ecolabel licence. If one or more supply chain certificates expire during the validity period of the awarded Ecolabel, it shall be demonstrated that recertification has taken place for each of the expired certifications by providing documentation for the mass balance calculation and/or invoices / delivery notes and/or certificate of analysis. If a declaration from the producer was used to demonstrate compliance with this EU Ecolabel criterion and it expires, a new declaration shall be provided. Competent bodies shall check the validity of the certificates on an annual basis, starting 12 months after the date of the awarding of the EU Ecolabel licence.

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Criterion 4. Excluded and restricted substances

4.1. Restrictions on substances of very high concern (SVHCs)

The final product formulation and any supplied substances (as such or in mixtures) therein shall not contain any ingoing substances that meet the criteria referred to in Article 57 of Regulation (EC) No 1907/2006 that have been identified in accordance with the procedure described in Article 59 of that Regulation and included in the candidate list for substances of very high concern for eventual inclusion in Annex XIV of that Regulation.

Assessment and verification

The applicant shall provide a signed declaration that the final product formulation and any supplied substances (as such or in mixtures) therein do not contain any SVHCs as ingoing substances. The applicant's declaration shall be supported by SDSs of all the supplied substances (as such or in mixtures) used to produce the final product and declarations from the chemical suppliers.

The list of substances identified as SVHCs and included in the candidate list in accordance with Article 59 of Regulation (EC) No 1907/2006 can be found in the ECHA website.

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

For any level of known impurities identified as SVHCs in ingoing substances, the concentration of the impurity and an assumed retention factor of 100% shall be used to estimate the quantity of the SVHC impurity remaining in the final product formulation. Any deviation from a retention factor of 100 % for an SVHC impurity (for example due to solvent evaporation or chemical modification) must be supported by appropriate proofs.

4.2. General restrictions based on classifications in accordance with Regulation (EC) No 1272/2008

(a) Final product formulation

The final product formulation shall not bear the hazard statements listed in Table 2 of sub-criterion 4.2, point (b), in accordance with Regulation (EC) No 1272/2008.

The only exceptions permitted to this rule shall be for hazard statements H412 or H413 in the case of undiluted products, if due to high concentrated nature of products. In particular, *Hand dishwashing detergent* undiluted products sold as a refill pack that need to be diluted in water at a dilution rate of 1:3 or more prior to use.

(b) Ingoing substances

Unless derogated in Table 3, the final product formulation shall not contain any ingoing substances in concentrations at or above 0,010 % w/w (100 ppm, 100 mg/kg) of the final product formulation that bear any of the hazard statements stated in Table 2, in accordance with Regulation (EC) No 1272/2008.

Table 2. Restricted hazard classes and categories, and associated hazard statements

Carcinogenic, mutagenic or toxic for reproduction	
Categories 1A and 1B	**Category 2**
H340: May cause genetic defects	H341: Suspected of causing genetic defects
H350: May cause cancer	H351: Suspected of causing cancer
H350i: May cause cancer by inhalation	

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H360: May damage fertility or the unborn child	H361: Suspected of damaging fertility or the unborn child
H360F: May damage fertility	H361f: Suspected of damaging fertility
H360D: May damage the unborn child	H361d: Suspected of damaging the unborn child
H360FD: May damage fertility. May damage the unborn child	H361fd: Suspected of damaging fertility. Suspected of damaging the unborn child
H360Fd: May damage fertility. Suspected of damaging the unborn child.	
H360Df: May damage the unborn child. Suspected of damaging fertility.	
Additional category for effects on or via lactation	
H362: May cause harm to breast fed children	
Acute toxicity	
Categories 1 and 2	**Category 3**
H300: Fatal if swallowed	H301: Toxic if swallowed
H310: Fatal in contact with skin	H311: Toxic in contact with skin
H330: Fatal if inhaled	H331: Toxic if inhaled
Supplemental hazard information	
EUH070: Toxic by eye contact	
Aspiration hazard	
Category 1	
H304: May be fatal if swallowed and enters airways	
Specific target organ toxicity	
Category 1	**Category 2**
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
Respiratory or skin sensitization	
Category 1, 1A and 1B	
H317: May cause an allergic skin reaction	
H334: May cause allergy or asthma symptoms or breathing difficulties if inhaled	
Hazardous to the aquatic environment	
Categories 1 and 2	**Categories 3 and 4**
H400: Very toxic to aquatic life	H412: Harmful to aquatic life with long-lasting effects
H410: Very toxic to aquatic life with long-lasting effects	H413: May cause long-lasting effects to aquatic life
H411: Toxic to aquatic life with long-lasting effects	
Hazardous to the ozone layer	
H420: Harms public health and the environment by destroying ozone in the upper atmosphere	

The use of substances that have been chemically modified during the production process, so that any relevant hazard for which the substance has been classified under Regulation (EC) No 1272/2008 no longer applies, shall be exempted from the requirement in point (b).

This sub-criterion, point (b) shall not apply to ingoing substances covered by Article 2(7), points (a) and (b), of Regulation (EC) No 1907/2006, which set out criteria for exempting

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substances in Annexes IV and V to that Regulation from the registration, downstream user and evaluation requirements.

Table 3. Derogations to restrictions on ingoing substances that are classified with one or more of the restricted hazards listed in Table 2

Substance type, substance name and CAS number	**Derogated hazard code(s)**	**Derogation conditions**
Surfactants	H400, H411, H412	* See horizontal derogation condition in table footer. The H400 derogation applies only to: • alcohols, C12-14, ethoxylated, predominantly linear, 1-2,5 EO (CAS No 68439-50-9); • alcohols, C12-14, ethoxylated, predominantly linear, 2-5 EO (CAS No 68439-50-9); • alcohols, C12-15-branched and linear, ethoxylated propoxylated (CAS No 120313-48-6); • alcohols, C13-15-branched and linear, ethoxylated, >2,5 - ≤5 EO (CAS 157627-86-6).
Enzymes	H317, H334, H400, H411	* See horizontal derogation condition in table footer. The H317 derogation applies only to auxiliary substances used in enzyme preparations. The H400 and H411 derogations apply only to subtilisin (CAS No 9014-01-1).
Nitrilotriacetic acid (NTA, CAS No 139-13-9)	H351	* See horizontal derogation condition in table footer. Only derogated in cases where the ingoing substance is derived from impurities in methylglycinediacetic acid trisodium salt (MGDA, CAS No 164462-16-2)) or tetrasodium glutamate diacetate (GLDA, CAS No 51981-21-6). NTA levels must be lower than 0,20 % in those raw materials and lower than 0,10 % in the final product.
Benzoic acid (CAS No 65-85-0)	H372	* See horizontal derogation condition in table footer. Only derogated as an in-situ generated substance when sodium benzoate is added as a preservative and sodium benzoate shall be permitted only at levels up to 1,0 % w/w of the final product formulation.
Amidoamine residues (for example CAS No 109-55-7, 4292-10-8, 68140-01-2 and 7651-02-7)	H317, H400, H411, H412	* See horizontal derogation condition in table footer. Only derogated when added as residues in cocoamidopropyl betaines surfactants and when the total quantity of derogated amidoamine residues is

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		less than 0,10 % w/w of the final product formulation.
Formic acid (CAS No 64-18-6)	H331	* See horizontal derogation condition in table footer. Only derogated for use as a preservative and only up to a maximum concentration of 0,50 % w/w in the final product formulation.

***Horizontal derogation condition:** none of the derogations above, either individually or in combination, shall be permitted if they result in the final product formulation being classified with any of the hazards defined in Table 2, with the notable exceptions of H412 and H413 when due to the concentrated nature of undiluted detergent products sold as a refill pack that need to be diluted at a rate of 1:3 or more prior to use.

Assessment and verification

The applicant shall provide a signed declaration of compliance with sub-criterion 4.2, including compliance with any relevant derogation conditions, supported by declarations from suppliers and any other relevant documentation.

A list of all ingoing substances with one or more of the restricted hazards calculated to be present in the final product formulation in concentrations matching or greater than 0,010 % w/w (100 ppm, 100 mg/kg) shall be presented, together with their CAS numbers, classification and the relevant function of the ingoing substance (for example surfactant, enzyme, etc.). Calculations of ingoing substances' concentrations in the final product formulation shall be based on:

(i) a list of all substances (as such or as part of a mixture) used to make the final product formulation;

(ii) the screening of substances (as such or as part of a mixture) for those ingoing substances and known impurities with any of the hazards listed in sub-criterion 4.2, point (b), Table 2;

(iii) the concentrations of any ingoing substances and known impurities with hazards listed in sub-criterion 4.2, point (b), Table 2 in the substances (as such or as part of a mixture) used in the format supplied;

(iv) the weight of each of the substances (as such or as part of a mixture) added to make a known weight of final product formulation.

Any ingoing substances shall be assumed by default to be 100 % retained in the final product. Justifications for any deviation from a retention factor of 100 % during processing (for example solvent evaporation) or for chemical modification of an ingoing substance shall be provided. Substances known to be released or to degrade from ingoing substances shall be considered ingoing substances and not impurities.

For any ingoing substances remaining in the final product formulation in concentrations matching or greater than 0,010 % w/w (100 ppm, 100 mg/kg), but which are exempted from sub-criterion 4.2 (see Annexes IV and V to Regulation (EC) No 1907/2006), a declaration to that effect by the applicant shall suffice.

Where suppliers are requested to provide information that may be commercially sensitive, they may provide such evidence directly to competent bodies without necessarily providing certain details to the applicant.

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4.3. Specific hazardous substances exclusions and restrictions

(a) Specific exclusions

Unless derogated in sub-criterion 4.2, point (b), Table 3, the following substances indicated shall not be included as ingoing substances in the final product formulation or as ingoing substances to the substances (as such or in mixtures) used to make the final product formulation:

(1) alkylphenols, alkylphenol ethoxylates (APEOs) and their derivatives, as referred to in entry 43 in Annex XIV or entry 46 in Annex XVII to Regulation (EC)No 1907/2006;

(2) diethylenetriaminepentaacetic acid (DTPA, CAS No 67-43-6) and its salts;

(3) ethylenediaminetetraacetic acid and its salts (EDTA, CAS Nos: 60-00-4, 64-02-8);

(4) organo-chlorine compounds;

(5) reactive chlorine compounds such as sodium hypochlorite (CAS No 7681-52-9), potassium hypochlorite (CAS No 7778-66-7), calcium hypochlorite (CAS No 7778-54-3), chlorine dioxide (CAS No 10049-04-4), chlorine gas (CAS No 7782-50-5), sodium dichloroisocyanurate dihydrate (CAS No 51580-86-0); trichloroisocyanuric acid (CAS No 87-90-1) and monochloramine (CAS No 10599-90-3);

(6) benzotriazole and benzotriazole derivatives;

(7) bisphenols* that have been identified by ECHA in their 2021 'Assessment of Regulatory Needs report on Bisphenols'([1]) for further EU regulatory risk management and that are known or potential endocrine disruptors for the environment or for human health, or that can be identified as toxic for reproduction;

(8) quaternary ammonium compounds that are not readily biodegradable, except for denatonium benzoate (CAS No 3734-33-6) and denatonium saccharide (CAS No 90823-38-4);

(9) rhodamine B (CAS No 90823-38-4);

(10) the following biocidal active substances:

(i) any formaldehyde releasers ([2]), such as (benzyloxy)methanol (CAS No 14548-60-8), EG Form (CAS No 3586-55-8), DMDMH (CAS No 6440-58-0), HHT (CAS No 4719-04-4), DTBMA (CAS No 2527-58-4), DBDCB (CAS No 35691-65-7), DGH (CAS No 13590-97-1) and tetramethylolglycoluril (CAS No 5395-50-6),

(ii) 3-iodo-2-propynyl butylcarbamate (IPBC, CAS No 55406-53-6),

(iii) 5-chloro-2-methyl-4-isothiazolin-3-one/2-methyl-4-isothiazolin-3-one (CMIT/MIT, CAS No 55965-84-9),

(iv) glutaraldehyde (CAS No 111-30-8),

(v) methylisothiazolinone (MIT, CAS No 2682-20-4),

(vi) tetramethylolglycoluril (CAS No 5395-50-6),

(vii) zinc pyrithione (CAS No 13463-41-7).

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[1] Assessment of regulatory needs: Bisphenols, ECHA. 16 December 2021. Available at: https://echa.europa.eu/documents/10162/bfb689cc-ff55-1796-2b74-0487b2fa1c66

[2] Bronopol (CAS No 52-51-7) is not considered to be a formaldehyde releaser.

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(11) nitromusks and polycyclic musks;

(12) synthetic polymer microparticles;

(13) nanomaterials;

(14) per- and polyfluoroalkyl substances (PFAS);

(15) substances classified as category 1 or category 2 endocrine disruptors for human health or the environment in accordance with Regulation (EC) No 1272/2008, substances included in the candidate list referred to in Article 59(1) of Regulation (EC) No 1907/2006 as having endocrine-disrupting properties for human health or the environment, substances identified as having endocrine-disrupting properties in accordance with Regulation (EU) No 528/2012 ([3]) or Regulation (EC) No 1107/2009 ([4]);

(16) substances classified as persistent, bioaccumulative and toxic (PBT) and very persistent and very bioaccumulative (vPvB) for the environment and living organisms including in humans in accordance with Regulation (EC) No 1272/2008, substances included in the candidate list referred to in Article 59(1) of Regulation (EC) No 1907/2006 as having PBT and vPvB properties for the environment and living organisms including in humans, substances identified as having PBT and vPvB properties for the environment and living organisms including in humans in accordance with Regulation (EU) No 528/2012 or Regulation (EC) No 1107/2009;

(17) substances classified as persistent, mobile and toxic (PMT) and very persistent and very mobile (vPvM) in accordance with Regulation (EC) No 1272/2008, substances included in the candidate list referred to in Article 59(1) of Regulation (EC) No 1907/2006 as having PMT and vPvM properties;

(18) phosphates.

*Note: sub-criterion 4.3, point (a), exclusion (7) on bisphenols also applies to packaging materials.

Assessment and verification

The applicant shall declare the non-use of the relevant substances indicated in this sub-criterion as ingoing substances in their formulation, supported by declarations from their suppliers about the non-use of the same hazardous substance groups as ingoing substances in the substances (as such or in mixtures) supplied and used in formulations covered by the EU Ecolabel licence application procedure.

The applicant shall provide a signed declaration of compliance from the manufacturer of the packaging materials about the non-use of bisphenols in the packaging materials of products covered by the EU Ecolabel licence application procedure.

(b) Specific restrictions

The level of 1,4-dioxane impurities in surfactants shall not exceed 0,010 % w/w (100 ppm, 100 mg/kg) in active matter (excluding water). Testing shall be conducted on samples taken at the production site or at any point downstream from the surfactant production process using gas chromatography–mass spectrometry and 1,4-dioxane-d8 as a calibration standard.

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[3] Regulation (EU) No 528/2012 of the European Parliament and of the Council of 22 May 2012 concerning the making available on the market and use of biocidal products (OJ L 167, 27.6.2012, p. 1). Available at: https://eur-lex.europa.eu/eli/reg/2012/528/oj/eng

[4] Regulation (EC) No 1107/2009 of the European Parliament and of the Council of 21 October 2009 concerning the placing of plant protection products on the market and repealing Council Directives 79/117/EEC and 91/414/EEC (OJ L 309, 24.11.2009, p. 1). Available at: https://eur-lex.europa.eu/eli/reg/2009/1107/oj/eng

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Assessment and verification

The applicant shall provide a signed declaration of compliance with the specific restrictions laid down in this sub-criterion 4.3, point (b), that shall be supported by declarations of non-applicability and/or applicability (compliance with the impurity limit for 1,4-dioxane) from surfactant suppliers. In cases of non-applicability, this shall be explained based on the surfactant production processes. In case of applicability, test reports according to relevant European or international standards or an equivalent method for representative production samples shall be presented to the competent body.

4.4. Other specific restrictions

(a) Total phosphorous content

The total phosphorus (P) content calculated as elemental P shall not exceed the following limits for the reference dosage: P-free* washing water.

* 'P-free' means no presence of phosphorus-containing ingoing substances above the limit of detection (LOD), with the exception of impurities, which may be present up to a concentration below 0,01 % (w/w) in the final formulation.

Assessment and verification

The applicant shall provide a signed declaration of compliance, supported by declarations from suppliers, confirming that the total amount of elemental P is equal to or lower than the limits set. The declaration shall be supported by the calculations of the total P content of the final product formulations.

(b) Preservatives

Note: this criterion does not apply to surfactants that may exhibit biocidal properties.

The only type of preservatives permitted in detergent formulations shall be product type 6 (PT6) (in-can preservatives) that are compliant with Regulation (EU) No 528/2012. For final products originating in the Union, it shall be considered that it is not sufficient for the active substances contained in the preservative product to be approved under Regulation (EU) No 528/2012 for PT6; the preservative product must be authorised under Regulation (EU) No 528/2012 for PT6 or made available on the market according to the transitional measures set out in Article 89(2) of that Regulation.

The following requirements relating to preservatives shall also apply:

(i) the total concentration of 1,2-Benzisothiazol-3(2H)-one (BIT) (CAS No 2634-33-5) in the final product formulation shall not exceed 0,0050 % w/w;

(ii) any PT6 preservatives used must be non-bioaccumulating, namely the BCF value shall be < 100 or the log K_{ow} value shall be < 3,0 for the active substance(s);

(iii) it shall not be claimed or suggested on the packaging or by any other communication that the product has an antimicrobial or disinfecting effect.

All PT6 preservatives added to ingoing substances shall be declared by suppliers and all preservatives added directly to the final product formulation shall be declared by the detergent producer.

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Assessment and verification

The applicant shall provide a signed declaration of compliance, supported by declarations from suppliers. The declaration shall clearly state the quantities of any preservatives added to ingoing substances or directly to the final product formulation, their CAS numbers, their BCF or log K_{ow} values and an overall calculation for the quantity of any BIT in the final detergent product formulation.

BCF and log K_{ow} values shall be determined as laid down in criterion 2. *Biodegradability, Assessment and verification* section, point (c) *Biodegradability of other organic compounds*, paragraphs five to eight.

The applicant shall also provide an artwork or a photo of the sales packaging to demonstrate the absence of claims about antimicrobial or disinfecting effects.

(c) Colouring agents

Colouring agents shall only be permitted in hand dishwashing detergents marketed as professional products. In this case, any colouring agents used shall be non-bioaccumulating, namely the BCF value shall be < 100 or the log K_{ow} value shall be < 3,0. If the product is marketed for both professional and not professional uses, the more stringent requirement shall apply. This requirement shall not apply to any colourants approved for use as food additives.

Assessment and verification

The applicant shall provide a signed declaration clearly indicating which products, if any, are marketed as professional products and which are not.

For products not marketed for professional use, the applicant shall declare the non-use of colouring agents in the final product formulation(s), supported by declarations from suppliers.

For products marketed for professional use, the applicant shall either:

declare the non-use of colouring agents in the final product formulation(s), supported by declarations from suppliers, or

declare the use of colouring agents in the final product formulation(s), supported by declarations from suppliers, if relevant, stating the names of the colouring agents, their CAS numbers or other identifiers, and information on their BCF or log K_{ow} value. If the colouring agent is exempt from the requirement due to being an approved food additive, evidence to this effect shall be provided. BCF and log K_{ow} values shall be determined as laid down in criterion 2. *Biodegradability, Assessment and verification* section, point (c) *Biodegradability of other organic compounds*, paragraphs five to eight.

(d) Enzymes

Enzymes shall be permitted only if they are used in encapsulated form (solids) or in liquid/slurry form.

Assessment and verification

The applicant shall provide a signed declaration of compliance supported by declarations from suppliers along with the SDS of any enzyme ingredient added.

(e) Fragrances

Fragrances shall not be used in hand dishwashing detergents marketed as professional products.

For all other hand dishwashing detergents, any ingoing substance added to the product as a fragrance shall be manufactured and handled following the code of practice of the International

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Fragrance Association (IFRA) ([5]). For such ingoing substances, the fragrance formulator shall follow the recommendations of the IFRA standards concerning prohibition, restricted use and specified purity criteria for substances.

Ingoing substances to fragrance formulation shall not be classified in accordance with Regulation (EC) No 1272/2008 to any of the hazards mentioned in section 'Carcinogenic, mutagenic or toxic for reproduction' of sub-criterion 4.2, point (b), Table 2.

Fragrance substances relevant to detergent products ([6]) that are prohibited in cosmetics products pursuant to Annex II to Regulation (EC) No 1223/2009 of the European Parliament and of the Council([7]) shall not be included as ingoing substances in the final product formulation or as ingoing substances to the substances (as such or in mixtures) used to make the final product formulation in EU Ecolabel detergent products.

Fragrance substances relevant to detergent products ([8]) restricted in cosmetics products pursuant to Annex III to Regulation (EC) No 1223/2009 shall not be present in EU Ecolabel detergent products in concentrations ≥ 0,010 % w/w (100 ppm, 100 mg/kg) per substance in the ready-to-use detergent product.

In addition, any EU Ecolabel detergent products marked as:

(i) 'mild/sensitive' or similar, shall not use fragrance formulations that contain ingoing substances classified as respiratory or skin sensitisers category 1 and sub-categories 1A or 1B or fragrance allergens included in Annex III to Regulation (EC) No 1223/2009;

(ii) 'fragrance-free' or similar, shall not include fragrances as ingoing substances, neither in the final product formulation nor in its packaging.

Assessment and verification

The applicant shall provide a signed declaration clearly indicating which products, if any, are marketed as 'mild/sensitive' or similar, which are marketed as professional products, and which are not.

For products marketed for professional use, the applicant shall provide a signed declaration of compliance regarding the non-use of fragrances, supported by signed declarations regarding the non-use of fragrances from their suppliers.

For products not marketed for professional use, the applicant shall provide a signed declaration of compliance, supported by signed declarations of compliance from the supplier or fragrance formulator.

— For each fragrance formulation supplied, the applicant shall provide a certificate of conformity with the IFRA standards, an SDS and concentrations of any fragrance substances listed in Annex III to Regulation (EC) No 1223/2009.

— If necessary, the applicant shall provide calculations to demonstrate compliance with the 0,010 % (100 ppm, 100 mg/kg) threshold for fragrance substances listed in Annex III to Regulation (EC) No 1223/2009 in the detergent product.

— The applicant shall provide a declaration of the non-use of any ingoing substances classified as category 1 or 2 carcinogens, mutagens or reproductive toxicants in

[5] Available at the IFRA website http://www.ifraorg.org

[6] List of substances included in the supporting documentation, such a user manual, available in the EU Ecolabel website.

[7] Regulation (EC) No 1223/2009 of the European Parliament and of the Council of 30 November 2009 on cosmetic products (OJ L 342, 22.12.2009, p. 59, ELI: http://data.europa.eu/eli/reg/2009/1223/oj).

[8] List of substances included in the supporting documentation, such a user manual, available in the EU Ecolabel website.

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accordance with Regulation (EC) No 1272/2008 and of the non-use of fragrance substances that are prohibited in cosmetics products pursuant to Annex II to Regulation (EC) No 1223/2009 as ingoing substances in the final product formulation or as ingoing substances in the substances (as such or in mixtures) used to make the final product formulation in EU Ecolabel detergent products.

In addition, the following specific verification requirements shall apply:

— For products marked as 'mild/sensitive', the applicant shall provide a declaration of the non-use of any ingoing substances classified as respiratory or skin sensitisers category 1 and sub-categories 1A or 1B in accordance with Regulation (EC) No 1272/2008 or fragrance allergens included in Annex III to Regulation (EC) No 1223/2009.

— For products marked as 'fragrance-free', the applicant shall provide a signed declaration of compliance from the fragrance formulator or the supplier of the packaging to demonstrate the non-addition of fragrances to the final product formulation or its packaging.

(f) Corrosive properties

The final hand dishwashing detergent product formulation shall not be classified as 'Skin corrosion/irritating', category 1 and sub-categories 1A, 1B or 1C, thus not bearing the hazard statement 'H314 - Causes severe skin burns and eye damage', in accordance with Regulation (EC) No 1272/2008.

Assessment and verification

The applicant shall provide a signed declaration of compliance, and any other relevant documentation disclosing: a list of all ingoing substances (as such or as part of a mixture) contributing to the final product formulation bearing the H314 hazard statement; the concentrations in which these ingoing substances are present; whether any specific concentration limits apply to any of these ingoing substances; and why the final product formulation does not qualify to bear the hazard statement H314, in accordance with Regulation (EC) No 1272/2008.

(g) Micro-organisms

(i) Identification:

— All intentionally added micro-organisms shall belong to or be deposited in a collection of an International Depository Authority (IDA) and be maintained by the culture collection for the authorised period of the EU ecolabel license.

— All intentionally added micro-organisms shall be identified and characterised using whole genome sequence (WGS) analysis according to 'EFSA Guidance on the characterisation of microorganisms used as feed additives or as production organisms' ([9]). However, once the corresponding delegated act referred to in Article 30(6) of Regulation (EU) 2026/405 establishing the methodology for a risk assessment starts applying, all intentionally added micro-organisms shall be identified and characterised using whole genome sequence analysis in accordance with the rules for identification and characterisation of micro-organisms using WGS analysis contained therein.

[9] EFSA Panel on Additives and Products or Substances used in Animal Feed (FEEDAP), G. Rychen, G. Aquilina, G. Azimonti, V. Bampidis, M. de L. Bastos, G. Bories, et al., 'Guidance on the Characterisation of Microorganisms Used as Feed Additives or as Production Organisms', EFSA Journal, Vol. 16, No. 3, March 2018. DOI: 10.2903/j.efsa.2018.5206

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— The following taxonomic information shall be provided, taking into consideration the latest published information in the International Codes of Nomenclature (ICN): genus, species and strain name or code.

(ii) Safety:

— A risk assessment shall be performed:

(a) at microorganisms (strain) level;

(b) at product level under all foreseeable use conditions as claimed in the product;

(c) whose scope must cover human, animal, plant and environmental health;

(d) to assess sensitisation (skin and respiratory) in addition to other relevant end-points, as identified by the risk assessment;

(e) to assess any potential effects on vulnerable groups (for example immunocompromised, elderly, infants, pregnant women, etc).

(f) to identify the information necessary for safe use by the end-user.

For products whose foreseeable use implies contact with food contact-surfaces, the risk assessment must additionally consider 'ingestion' as exposure route.

Once the corresponding delegated act referred to in Article 30(6) of Regulation (EU) 2026/405 establishing the methodology for a risk assessment starts applying, the risk assessment requested in this point (ii) Safety shall be carried out in accordance with the risk assessment methodology contained therein.

(iii) Unintentional presence of micro-organisms:

— It must be ensured that the finished product is not unintentionally contaminated with microorganisms. Alternatively, the product should present a low risk of microbial contamination under its intended use according to relevant European or international standards or an equivalent test method.
— Pathogenic micro-organisms listed in Annex II, Section 2. to Regulation (EU) 2026/405 shall not be present in any of the microbial formulations intentionally added in the finished product in accordance with relevant European or international standards or an equivalent test method.

(iv) All intentionally added micro-organisms shall not be genetically modified micro-organisms (GMMs).

(v) Hazard/s identification – All intentionally added micro-organisms shall be assessed for antibiotic susceptibility, antimicrobial production and toxigenicity/pathogenicity according to the 'EFSA Guidance on the characterisation of microorganisms used as feed additives or as production organisms' (10). The outcome of the assessment shall be 'no hazard identified', meaning that microorganisms are:

— free from acquired antibiotic resistance determinants and susceptible to each of the five major antibiotic classes (aminoglycoside, macrolide, beta-lactam, tetracycline and fluoroquinolones) with the exception of intrinsic resistance;
— shown not to produce relevant antimicrobial substances and;
— shown to be non-pathogenic/non-toxigenic.

[10] EFSA Panel on Additives and Products or Substances used in Animal Feed (FEEDAP), G. Rychen, G. Aquilina, G. Azimonti, V. Bampidis, M. de L. Bastos, G. Bories, et al., 'Guidance on the Characterisation of Microorganisms Used as Feed Additives or as Production Organisms', EFSA Journal, Vol. 16, No. 3, March 2018. DOI: 10.2903/j.efsa.2018.5206

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Microorganisms included in the QPS status list issued by EFSA and that fulfil the qualifications provided by it, shall be exempt from the requirements in point (v) above concerning humans and animals.

(vi) Products in their in-use form shall have $\geq 1 \times 10^5$ colony-forming units (CFU) per millilitre or gram in accordance with relevant European or international standards or an equivalent method for the determination of micro-organism numbers. The minimum shelf life of a product shall not be shorter than 18 months and, by the end of that period, the product shall have $\geq 1 \times 10^4$ CFU per millilitre or gram in accordance with relevant European or international standards or an equivalent method for the determination of microorganisms' numbers. The expected stability of the product shall be demonstrated taking into account the storage conditions as recommended by the manufacturer.

(vii) Fitness for use: The product shall fulfil all the requirements set out in Criterion 7 on fitness for use

(viii) All claims made by the manufacturer on the actions or the performance of the micro-organisms intentionally added to the product shall be substantiated with appropriate tests.

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

(x) User information: the product label shall include the following:

— information that the product contains micro-organisms,
— an indication of the shelf life of the product,
— use instructions or special precautions, where relevant (as identified in the risk assessment).

Assessment and verification

The applicant shall provide the following documentation.

(i) for each micro-organism intentionally added in the product:

— a valid certificate of deposition from the IDA, specifying the accession number under which the strain is held.
— the taxonomic information: genus, species and strain name or code and;
— identification with IDA numbers or documentation on DNA identification.
— documentation about the minimum set of information for WGS analysis, in accordance with Section 2.1.1 of 'EFSA Guidance on the characterisation of microorganisms used as feed additives or as production organisms' ([11]). Once the corresponding delegated act referred to in Article 30(6) of Regulation (EU) 2026/405 establishing the methodology for a risk assessment starts applying the verification documentation accepted in that Regulation shall also be accepted as verification means for the purposes of this Decision.

(ii) documentation on any risk assessment made at (a) microorganisms (strain) or (b) product level encompassing the scope mentioned in (c) and structured as *Hazard identification, Hazard characterisation, Exposure assessment, Risk characterisation*. The risk assessments shall, at the minimum: contain information on the aspects cited in points (d), (e) and (f); discuss/demonstrate why the use of such microorganism/s and/or product/s is deemed safe/of acceptable risk; and highlight areas of uncertainty and their impact on the assessment made.

[11] EFSA Panel on Additives and Products or Substances used in Animal Feed (FEEDAP), G. Rychen, G. Aquilina, G. Azimonti, V. Bampidis, M. de L. Bastos, G. Bories, et al., 'Guidance on the Characterisation of Microorganisms Used as Feed Additives or as Production Organisms', EFSA Journal, Vol. 16, No. 3, March 2018. DOI: 10.2903/j.efsa.2018.5206

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For products whose foreseeable use implies contact with food contact-surfaces, the risk assessment must additionally refer to 'ingestion' as exposure route.

Once the corresponding delegated act referred to in Article 30(6) of Regulation (EU) 2026/405 establishing the methodology for a risk assessment starts applying, the verification documentation accepted in that Regulation shall also be accepted as verification means for the purposes of this Decision. The risk assessment requested under point (ii) Safety shall follow that methodology. In addition, if any of the aspects listed in points (a) to (f) are absent in that methodology, they should additionally be considered for this risk assessment.

(iii) documentation describing how it is ensured that the product is not contaminated with pathogen microorganisms or documentation according to relevant European or international standards or an equivalent test method demonstrating that the product can be considered a microbiologically low-risk product. Test documentation according to relevant European or international standards or an equivalent test method demonstrating that the pathogenic micro-organisms are not present in any of the strains included in the finished product.

(iv) documentation demonstrating that all micro-organisms are not GMMs.

(v) test documentation, in accordance with the 'EFSA Guidance on the characterisation of microorganisms used as feed additives or as production organisms' ([12]), demonstrating that all micro-organisms are:

— free from acquired antibiotic resistance and susceptible to each of the five major antibiotic classes indicated with the exception of intrinsic resistance;
— not antimicrobial producers and;
— non-pathogenic / non-toxigenic.

The term 'relevant' in the clause 'shown not produce relevant antimicrobial substances' should be interpreted and reported in the context of the 'WHO List of Medically Important Antimicrobials' (WHO MIA List) ([13]).

To be exempted from the requirements under point (v) proof shall be provided that the microorganisms belong to the QPS list issued by EFSA, making reference to the most up to date version. In addition, a list of the associated 'qualifications' and a reasoned justification of how these fulfil the requirements set in point (v) Hazard identification shall be provided.

(vi) Test documentation of CFU per ml of in-use solution (for undiluted products, the dilution ratio recommended for 'normal' cleaning shall be used), measured at the time of applying for the EUEL award.

A declaration indicating that:

— the minimum shelf-life of the product is not shorter than 18 months and;
— by the end of the shelf-life of the product the CFU per ml in accordance with relevant European or international standards or an equivalent method for the determination of microorganisms' numbers is $\geq 1 \times 10^4$ CFU.

A justification on the expected stability of the product when stored as recommended by the manufacturer.

[12] EFSA Panel on Additives and Products or Substances used in Animal Feed (FEEDAP), G. Rychen, G. Aquilina, G. Azimonti, V. Bampidis, M. de L. Bastos, G. Bories, et al., 'Guidance on the Characterisation of Microorganisms Used as Feed Additives or as Production Organisms', EFSA Journal, Vol. 16, No. 3, March 2018. DOI: 10.2903/j.efsa.2018.5206

[13] WHO's List of Medically Important Antimicrobials: a risk management tool for mitigating antimicrobial resistance due to non-human use. Geneva: World Health Organization; 2024. Licence: CC BY-NC-SA 3.0 IGO. Accessible at: https://cdn.who.int/media/docs/default-source/gcp/who-mia-list-2024-lv.pdf?sfvrsn=3320dd3d_2

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(vii), (viii) Packaging artwork and/or a sample/copy of the product's label indicating the claims made about the actions and/or the performance of the intentionally added micro-organisms and test results/reports substantiating such claims.

(vi), (ix) and (x) Packaging artwork and/or a sample/copy of the product's label.

Criterion 5. Packaging

(a) Recycled materials content

The criterion sets requirements for sales packaging and grouped packaging for consumer and professional detergent products. Only post-consumer materials shall be considered as recycled content.

(a) (i) Where paper/cardboard is used for packaging:

— sales packaging made of paper and/or cardboard shall contain at least 85 % recycled material.

— grouped packaging made of paper and/or cardboard shall contain at least 75 % recycled material.

Exemptions from the requirement: paper/cardboard packaging used as sales packaging for liquid packaging carton (LPC).

The remaining share (100 % minus recycled content percentage) of virgin paper and/or cardboard used for the sales and grouped packaging shall be covered by:

— a chain of custody system, and

— a third-party certification scheme addressing sustainable sourcing.

The third-party certification scheme shall:

— certify at least 70 % of the material as sustainably sourced;

— certify the remaining part as legally sourced and meeting any other requirement of the certification scheme with respect to the material not certified as sustainably sourced;

— demonstrate responsible sourcing practices and comply with relevant European or international standards or third-party certification schemes for sustainable sourcing.

(ii) Where paper/cardboard is used as sales packaging for LPC, 100 % of the material shall be covered by a chain of custody system, and it shall be certified by a third-party certification scheme as having the characteristics reported in paragraph (a)(i).

Pursuant to paragraphs (i) and (ii):

— the certification bodies issuing sustainable sourcing certificates shall be accredited or recognised by that certification scheme;

— any virgin fibres used must not originate from GMO species.

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(b) Where plastic is used for packaging:

(i) Sales packaging:

— until 31 December 2029, sales packaging made of PET shall contain a minimum of 30 % recycled material, and other plastics (e.g. PP, HDPE) shall contain a minimum of 20 % recycled material.

— from 1 January 2030, sales packaging made of PET shall contain a minimum of 50 % recycled material, and other plastics (e.g. PP, HDPE) shall contain a minimum of 40 % recycled material.

The recycled content shall refer to the total weight of the whole packaging unit (bottle/box/container, closure and label).

Exemptions from the requirement:

— closures.

— pouches.

— any plastic part representing less than 5 % of the total weight of the whole sales packaging unit.

— packaging used for the transport of dangerous goods in accordance with Directive 2008/68/EC.

— products delivered in a reusable plastic package that is part of a re-use system.

(ii) Grouped packaging:

— single-use plastic packaging shall not be used in grouped packaging.

— other types of plastics used in grouped packaging shall be fully compatible with recycling processes (i.e. have a minimum recyclability performance grade of 95 %), or

— alternatively, reusable packaging in accordance with Articles 11 and 27 of Regulation (EU) 2025/40 of the European Parliament and of the Council ([14]) shall be used.

(c) Optional claim on the packaging

The percentage of recycled content in the sales packaging may be disclosed in the product packaging (for example label) or in its accompanying technical datasheet.

Assessment and verification

For point (a)(i) Paper/cardboard used for packaging, the applicant shall submit:

(1) a signed declaration of compliance specifying the percentages of recycled content in the sales and grouped packaging;

(2) documents demonstrating that the recycled content complies with relevant European or international standards or third-party certification schemes.

[14] Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC (OJ L, 2025/40, 22.1.2025, ELI: http://data.europa.eu/eli/reg/2025/40/oj).

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For both points (a)(i) paper/cardboard used for packaging and (a)(ii) paper/cardboard used as sales packaging for LPC, the applicant shall submit:

(3) for the remaining share (100 % minus recycled content percentage) under point (a)(i) and for the whole (100 %) material in the product packaging under point (a)(ii), a signed declaration of compliance supported by an independently certified chain of custody certificate;

(4) for the remaining share (100 % minus recycled content percentage) under point (a)(i) and for the whole (100 %) material in the product packaging under point (a)(ii), audited accounting documents - if not explicitly reported by the certification scheme - that demonstrate:

— at least 70 % of the raw materials used for the production of the packaging are sustainably sourced;

— the remaining part is legally sourced and meets any other requirement of the certification scheme with respect to the material not certified as sustainably sourced.

The audited accounting documents shall be valid for the whole duration of the EU Ecolabel licence. The producer of the packaging shall document, for instance on the basis of an invoice or delivery note, compliance with the requirement that: (i) at least 70 % of certified paper/cardboard is purchased on a yearly basis; and (ii) that the remaining proportion is covered by a verification system that ensures that it is legally sourced and meets any other requirement of the certification scheme with respect to the material not certified as sustainably sourced.

(5) Evidence demonstrating that any virgin material used is sourced from non-GMO species. This evidence can be omitted if the certification scheme used certifies the absence of GMO species in virgin materials.

For point (b)(i) Plastic used for sales packaging, the applicant shall submit:

(1) a signed declaration of compliance specifying the percentages of recycled content in the sales packaging;

(2) technical documentation accompanying the packaging, where the recycled content of the sales packaging shall be indicated, and the recycled content stated shall refer to the total weight of the whole sales packaging unit. The technical documentation shall have the model structure set out in Annex VIII and contain the elements specified in the module set out in Annex VII of Regulation (EU) 2025/40.

The plastic recycled content of the packaging shall be calculated in accordance with relevant European or international standards or an equivalent method until the methodology for calculation and verification referred to in Article 7(8) of Regulation (EU) 2025/40 starts applying. The recycled content shall comply with relevant European and international chain-of-custody standards or an equivalent method. An equivalent method may be accepted if considered equivalent by a third-party, and shall be accompanied by detailed explanations that demonstrate compliance with the requirements in point (b)(i) and related supporting documentation. Invoices demonstrating the purchase of the recycled material shall be provided. Once the methodology for calculation and verification referred to in Article 7(8) of Regulation (EU) 2025/40 starts applying, it will supersede all other European or international standards or an equivalent testing method.

Competent bodies shall check the declaration of compliance specifying the percentages of plastic recycled content for sales packaging again after 1 January 2030.

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For point (b)(ii) Plastic used for grouped packaging, the applicant shall submit a signed declaration of compliance along with relevant documentation specifying that:

— single-use plastic packaging is not utilised in grouped packaging;

— recyclability performance grade of 95 % in grouped plastic packaging, or

— reusable packaging complying with Articles 11 and 27 of Regulation (EU) 2025/40 is utilised for the grouped packaging.

The recyclability performance grade of plastic packaging shall be verified by complying with relevant European or international standards or an equivalent method until the delegated acts referred to in Article 6(4), points (a), (b) and (c) of Regulation (EU) 2025/40 start applying. An equivalent testing method may be accepted if deemed comparable by an independent third-party certification for plastic packaging. When the delegated acts referred to in Article 6(4), points (a), (b) and (c) of Regulation (EU) 2025/40 start applying, they will supersede all other European standards or international standards or an equivalent testing method for the purposes of point (b)(ii) Plastic used for grouped packaging.

For point (c) Optional claim on the packaging

If the applicant intends to make a claim about the recycled content of the sales packaging, the claim shall be displayed in the product packaging (for example, the label) and/or its accompanying technical datasheet. The applicant shall provide either a high-resolution photograph of the sales packaging showing the label with the claim clearly visible, or a sample of the product label, as documentation of the claim.

(b) Design for recycling

Plastic and fibre-based sales 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 main body, colour, label or sleeve, adhesive, closure, barrier coatings, additives, and inks/printing shall not comprise, either singularly or in combination the materials, components and treatments listed in Table 4.

Metal parts in pump mechanisms (including in sprays) shall be removable.

Fibre-based packaging (except Liquid Packaging Carton (LPC)) shall contain at least 90 % paper/cardboard.

LPC shall contain at least 60 % paper/cardboard.

Packaging that is part of a re-use system (sub-criterion 5(d)) is exempted from the requirements in this sub-criterion 5(b).

Packaging used for the transport of dangerous goods in accordance with Directive 2008/68/EC is exempted from the requirements of this sub-criterion 5(b).

The requirements in this sub-criterion 5(b) shall be valid until the delegated acts referred to in Article 6(4), points (a), (b) and (c) of Regulation (EU) 2025/40 start applying. When the delegated acts start applying, the plastic and fibre-based sales packaging used for consumer and professional detergent products shall achieve a recyclability performance grade of A and/or B, as described in Table 3 of Annex II to Regulation (EU) 2025/40.

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Table 4. Materials, components and treatments excluded from packaging elements

Packaging element	**Excluded materials, components and treatments (*1)**
Main body/ material composition	For all fibre-based packaging: — lacquered surface *(exception: clear protective lacquer up to a thickness of ≤ 5 μm)*, — PVC or plastic based on other types of halogenated plastics, — aluminium and other metals; for fibre-based packaging (*except LPC*): — two-sided plastic laminate; for PET packaging: — PLA, PVC, PS, PETG, PC, PBT; for PE and PP rigid packaging: — PLA, PVC, PS, PET, PETG, — PP > 5 wt% in PE packaging and PE > 5 wt% in PP packaging, — aluminium and other metals; for PE and PP flexible films packaging (*except labels*): — PVC, PS, PET, — multilayer structure composed of different polymers/materials *(exception: PP up to 5 wt% in PE flexibles and PE up to 10 wt% in PP flexibles);* for all plastic packaging: — fluorination treatment, — electron-beam treatment, — biodegradable polymers.
Colours	For all plastic packaging: — non-NIR detectable colours, — black, carbon black, inner black layer, fluorescent; for PET packaging: — opaque; for LPC: — colourants/dyes not approved for food packaging application, — metal pigments taking up > 50% of the projected surface, — > 50% fully printed black using carbon black.
Labels or sleeves	For all fibre-based packaging: — non-paper based labels; for all plastic packaging: — metallised labels or sleeves, — non-releasable labels/sleeves or welded to a packaging body, — non-releasable in-mould labels,

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	— paper labels with fibre loss; <u>for PET packaging:</u> — PS, PVC, PETG, C-PET, POM, PET, labels/sleeves or any other plastic materials for sleeves/labels with a density > 1 g/cm^3, — PLA labels; <u>for PE and PP rigid packaging:</u> — PS, PVC, PET, PETG, C-PET, PLA, or any other non-PO plastic materials for sleeves/labels with a density < 1 g/cm^3, — aluminium; <u>for PE flexible films packaging:</u> — PP, — fibre-based (paper) labels; <u>for PP flexible films packaging:</u> — PE; — fibre-based (paper) labels.
Adhesives	<u>For PET packaging:</u> — alkali/water-soluble adhesives, — alkali/water non-releasable adhesives at 70-90 °C; <u>for HDPE/PE packaging:</u> — adhesives that are non-releasable in the recycling process for HDPE packaging; <u>for PP packaging:</u> — adhesives that are non-releasable in the recycling process for PP packaging; <u>for PE and PP flexible films packaging:</u> — adhesives that are non-soluble in water or non-releasable in water at less than 40 °C; <u>for all fibre-based packaging:</u> — water-insoluble adhesives, — pressure sensitive hotmelt.
Closures	<u>For all plastic packaging:</u> — closures made of metal or glass, — closures made of silicone, — metallic foils or any seals which remain fixed to the bottle or its closure after the product has been opened; <u>for PET packaging:</u> — PS, PVC, C-PET, POM, PETG closures with a density > 1 g/cm^3 and any other materials and blends with a density of >1g/cm^3, — EVA-containing component (e.g. liner or valve) with a density of ≥1 g/cm^3, — foamed PET; <u>for HDPE/PE packaging:</u> — PS, PVC closures, — PET, PETG, PLA (all with a density of > 1 g/cm^3),

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	— PP > 5 wt%, PE-X (cross-linked PE), — Non-PO plastics with a density of < 1 g/cm^3 — Non-PO foams with a density of < 1 g/cm^3; <u>for PP packaging:</u> — PS, PVC closures, — PET, PETG, PLA (all with a density of > 1 g/cm^3), — HDPE, LDPE, LLDPE, MDPE, PE-X (cross-linked PE), — non-PO plastics with a density of < 1 g/cm^3, — non-PO foams with a density of < 1 g/cm^3; <u>for PE and PP flexible films packaging:</u> — closures of a different material to the main material, — aluminium, PVC, PET, PETG, PS, PLA, non-PO, — non-PO foams with a density of < 1g/cm^3; <u>for all fibre-based packaging:</u> — PVC/PVdC; <u>for LPC:</u> — non-PO plastics with a density of < 1 g/cm^3.
Barrier coatings	<u>For all plastic packaging:</u> — polyamide (PA), — functional polyolefins, — metallised and light-blocking barriers; <u>for PET packaging:</u> — EVOH, — PGA; <u>for PE and PP rigid packaging:</u> — EVOH ≥ 6 wt% provided with tie layers ratio ≥ 2 made by a polymer other than the one used for the packaging body, — PVDC, — PVOH; <u>for PE and PP flexible films packaging:</u> — EVOH ≥ 5 wt% provided with tie layers made by a polymer other than the one used for the packaging body, — PVC, PVDC, PE-X (cross-linked PE), — PVOH, AlOx coating with PVOH primer, — aluminium; <u>for all fibre-based packaging:</u> — PVC or plastic based on other types of halogenated plastics, — aluminium and other metals; <u>for LPC:</u> — > 10 % EVOH as coextruded layer in the polymer component of the PolyAl film fraction, with at least one surrounding layer containing maleic anhydride (MAH) grafted PE in a ratio of ≥ 1 g per g EVOH, — PET.

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Additives	For all polyolefin plastic packaging: — additives that increase the density to higher than 0,97 g/cm³ (e.g. $CaCO_3$, etc.), — bio-/oxo-/photodegradable additives; for PET packaging: — nanocomposites, — bio-/oxo-/photodegradable additives, — UV stabilisers, acetaldehyde (AA) blockers, optical brighteners, oxygen scavengers; for PE and PP rigid packaging: — flame-retardant additives, plasticisers; for PE and PP flexible films packaging: — foaming agents used as expanding chemical agents; for all fibre-based packaging: — wet strength agents, i.e. polyamide epichlorohydrin (PAE), and urea/formaldehyde, urea/melamine; for LPC: — wet strength agents, i.e. glyoxalated poly-acrylamide (GPAM), polyamide epichlorohydrin (PAE), and urea/formaldehyde, if relative wet strength is > 15 % (*).
Inks/printing	For all packaging: — inks non-compliant with EuPIA Exclusion Policy for Printing Inks and Related Products ([15]), — bleeding inks, — de-inking/washable inks, — PVC binders; for all rigid plastics packaging: — direct print (*exception: production codes, dates codes and UFI codes ([16])*); for PET packaging: — metallic inks; for PE and PP rigid packaging: — PVC copolymers and terpolymer binders and any other chlorinated binders; for PE and PP flexible films packaging: — direct print — *(exceptions: a) production codes, date codes and UFI codes*; *b) inks (without NC and PVC binders) up to a maximum 5 % of total packaging_structure weight),* — NC binders;

[15] EuPIA Exclusion Policy for Printing Inks and Related Products.

[16] The UFI (unique formula identifier) code is used to uniquely identify hazardous mixtures in order to enable poison control centres to administer first aid faster. The code is found on products classified as hazardous to health or physical hazards under EU Regulation (EC) 1272/2008 (CLP Regulation).

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	for all fibre-based packaging (*except LPC*): — direct print with non-water based inks (*exceptions: production codes, date codes and UFI codes*), — digital hotmelt inks, — mineral-oil-based inks; for LPC: — direct print other than ultraviolet cured ink.
Abbreviations and definitions: AlOx – aluminium oxide, $CaCO_3$ – calcium carbonate, C-PET – crystallised polyethylene terephthalate), EVA – ethylene vinyl acetate, EVOH – ethylene vinyl alcohol, HDPE – high-density polyethylene, LDPE – low-density polyethylene, LLDPE – linear low-density polyethylene, LDPET – low-density polyethylene terephthalate, MDPE – medium-density polyethylene, NC – nitrocellulose, NIR – near-infrared, PA – polyamide, PE – polyethylene, PET – polyethylene terephtalate, PETG – polyethylene terephthalate glycol-modified, PE-X – cross-linked polyethylene, PGA – poly(glycolic) acid, PLA – polylactic acid, PO – polyolefins, POM – polyoxymethylene, PP – polypropylene, PS – polystyrene, PVC – polyvinylchloride, PVDC – polyvinylidene chloride, PVOH – polyvinyl alcohol. (*) Determined by measuring the dry tensile strength and the wet tensile strength according to relevant European or international standards or an equivalent method.	

Assessment and verification

The applicant shall provide a signed declaration of compliance from the manufacturer of the sales packaging specifying the material composition of the packaging, including the main body, colour, label or sleeve, adhesives, closure, barrier coating, additives and inks/printing along with photos or technical drawings of the primary packaging. Adhesive requirements shall be verified according to the Design for Recycling guidelines of relevant European or international standards or an equivalent method, to ensure that adhesives are not classified as not compatible with recycling.

When the delegated acts referred to in Article 6(4), points (a), (b) and (c) of Regulation (EU) 2025/40 start applying, the plastic and fibre-based sales packaging used for consumer and professional detergent products shall achieve a recyclability performance grade of A and/or B, as described in Table 3 of Annex II of Regulation (EU) 2025/40.

The recyclability performance grade of A and/or B shall be assessed on the basis of the assessment criteria and procedures outlined in the delegated acts referred to in Article 6(4), points (a), (b) and (c) of Regulation (EU) 2025/40 for plastics and fibre-based sales packaging category listed in Table 2 of Annex II of Regulation (EU) 2025/40. Packaging recyclability shall be expressed in the recyclability performance grades A and/or B as described in Table 3 of Annex II of Regulation (EU) 2025/40.

(c) Weight/utility ratio (WUR)

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

Product type	**WUR (g/l of washing water)**
Hand dishwashing detergent	0,3

This requirement shall not apply to:

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— Paper/cardboard sales packaging made of more than 85 % of recycled materials.

— Plastic sales packaging made of more than 80 % of recycled materials.

— Packaging that is reusable and that is part of a re-use system (sub-criterion 5(d)).

Assessment and verification

The applicant shall provide the calculation of the WUR of the product. If the product is sold in different packaging (i.e. with different volumes), the calculation shall be submitted for each packaging size for which the EU Ecolabel shall be awarded.

The WUR is calculated as follows:

$$\mathbf{WUR} = \sum \frac{(W_i + U_i)}{(D_i * R_i)}$$

Where:

W_i: weight (g) of the sales packaging (i);

U_i: weight (g) of non-post-consumer recycled packaging in the sales packaging (i); $U_i = W_i$ unless the applicant can prove otherwise;

D_i: number of reference doses contained in the sales packaging (i);

R_i: refill index. $R_i = 1$ (packaging is not reused for the same purpose) or $R_i = 2$ (if the applicant can document that the packaging component can be reused for the same purpose and that they sell refills).

The applicant shall provide a signed declaration of compliance confirming the content of post-consumer recycled material, along with relevant documentation. Packaging is regarded as post-consumer 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.

(d) Packaging re-use systems

If the packaging of the product is reusable, as referred to in Article 11 of Regulation (EU) 2025/40, and is part of a re-use system fulfilling the obligations set out by Article 28 of Regulation (EU) 2025/40 and the requirements of Part A of Annex VI to that Regulation, that packaging is exempt from the requirements set out in sub-criteria (b) and (c) of Criterion 5. This exemption shall be applicable to any reusable packaging that is part of a re-use system, including packaging of products purchased through refill that is part of a re-use system. Purchase through refill shall fulfil the obligations set out in Article 28 of Regulation (EU) 2025/40 and the requirements in Part C of Annex VI to that Regulation, as well as the requirements of Article 12 of Regulation (EU) 2026/405.

If the packaging that is reusable and is part of the re-use system is plastic packaging, that packaging shall also be exempt from the requirements set out in sub-criterion (a) of Criterion 5.

Assessment and verification:

The applicant shall provide a signed declaration of compliance along with relevant documentation describing or demonstrating that a re-use system has been put in place for the packaging and that single-use plastic packaging is not utilised.

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Criterion 6. Fitness for use

The product shall have a satisfactory cleaning performance at the lowest temperature and dosage recommended by the manufacturer for the water hardness (if a range is provided, the lower end) according to the 'Framework for performance testing for hand dishwashing detergents' available on the EU Ecolabel website ([17]).

Assessment and verification

The applicant shall provide documentation demonstrating that the product has been tested under the conditions specified in the 'Framework for performance testing for hand dishwashing detergents' and that the results showed that the product achieved at least the minimum cleaning performance required.

The applicant shall also provide documentation demonstrating compliance with the laboratory requirements included in the relevant harmonised standards for testing and calibration laboratories.

An equivalent test performance may be used if equivalence has been assessed and accepted by the competent body.

Criterion 7. User information

The product shall be accompanied by instructions for proper use to maximise product performance, minimise waste, and reduce water pollution and the use of resources.

As specified in points (a) to (d), the instructions shall be provided via sales packaging (on, attached to, or inside it) or be made available via a digital product passport (DPP), a web link or a QR code directing to a website and/or to a document (for example technical datasheets) containing such information in accordance with Regulation (EU) 2026/405.

The instructions shall be legible or include a graphical representation or icons and shall include information on the following.

(a) Dosing instructions

The applicant shall take suitable steps to help consumers respect the recommended dosage, by making the dosing instructions for the relevant format of the product (liquid, gel, solid, powder, caps, tablets or any other) available on the sales packaging and by making the dosage system compatible with such instructions (for example, by ensuring that the graduation of caps reflects dosing instructions).

Professional products may provide dosing instructions digitally or, alternatively, via sales packaging.

Dosing instructions shall include the recommended dosage and, if applicable, the impact of the water hardness on the dosing.

If applicable, indications shall be provided of the most prevalent water hardness in the area where the product is intended to be marketed or of where this information can be found.

[17] [URL for protocol on EU Ecolabel website will be inserted later currently all proposed protocol documents can be found in the Technical Report]

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(b) Information on the disposal of packaging

The sales packaging shall include information on its reuse, recycling and/or correct disposal.

Information on the reuse, recycling and/or correct disposal of any other packaging associated with the product shall be made available to users on the sales packaging or digitally.

(c) Environmental information

A text indicating the importance of using the correct dosage to minimise energy and water consumption, and reduce water pollution, shall be provided on the sales packaging.

(d) Special information and/or precautions

Precautionary information about products containing intentionally added micro-organisms deemed as conducive to safer use shall be provided on the sales packaging when identified in the safety/risk assessment performed.

Any other information that has been verified and validated by the competent body (for example performance claims about the product or product properties) may be disclosed/provided to users on the sales packaging or digitally.

Assessment and verification

The applicant shall provide a signed declaration of compliance along with a sample of the product label (as included on the sales packaging) or an artwork/ photograph of the sales packaging where the label is clearly visualised. In addition, the applicant shall provide a signed declaration of compliance along with a sample or artwork of the information provided digitally (in the DPP, web link or QR code).

Criterion 8. Information appearing on the EU Ecolabel

The logo shall be visible and legible. The EU Ecolabel registration/licence number shall appear on the product and it shall be legible and clearly visible.

The applicant may choose to include an optional text box on the label that contains the following three statements:

‘— Limited impact on the aquatic environment;

— Minimised content of hazardous substances;

— Tested for cleaning performance’.

The guidelines for the use of the optional label with text box can be found in the ‘EU Ecolabel logo guidelines’ on the website:

https://op.europa.eu/en/publication-detail/-/publication/aaf2a1b7-466e-11f0-b9f2-01aa75ed71a1/language-en

Assessment and verification

The applicant shall provide a signed declaration of compliance along with a sample of the product label or artwork of the packaging where the EU Ecolabel is placed.

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