

Sub consultation response document for

Laundry detergents and stain removers



Draft generation 8

2019-08-12

Nordic Ecolabelling for Laundry detergents and stain removers

Sub consultation response document

006 – 8.0, 2019-08-12

- 1 Summary 1**
- 2 About the consultation 1**
- 3 Compilation of incoming comments and feedback 2**
- 4 Comments to the criteria in detail 4**
 - 4.1 Sub consultation 1: Packaging and recycling 4**
 - 4.2 Sub consultation 2: General comments 2**
 - 8**
 - 4.3 Sub consultation 2: Correct dosing, ecotoxicity and biodegradability 3**
 - 0**
 - 4.4 Sub consultation 2: Consumer guidance 3**
 - 9**
 - 4.5 Sub consultation 2: Performance 4**
 - 2**
 - 4.6 Sub consultation 3: Sustainable renewable raw materials 5**
 - 6**
 - 4.7 Sub consultation 3: Micro plastics and other excluded substances 6**
 - 4**
- 5 Comments to the background of the criteria..... 67**
 - 5.1 Sub consultation 2: Dosing, ecotoxicity and biodegradability; Consumer guidance; Performance 6**
 - 7**
 - 5.1.1 Background to requirement O7 Fitness for use 67
- 6 Discussions and conclusions..... 67**

1 Summary

The sub consultation on revising the criteria for laundry detergents and stain removers has been conducted in the period from February 4 – April 14, 2019. All consultation documents are located at: <http://www.nordic-ecolabel.org/criteria-revisions/laundry-detergents/>

After the three consultation periods, Nordic Ecolabelling drafted a proposal for criteria for laundry detergents and stain removers, based on new information, for a final public consulting period.

The biggest changes after the sub consultation has been made to the packaging requirements. The percentage of recycled plastics in packaging has been reduced from 75 % to 50 % and several changes has been made to requirement on design for recycling.

Smaller adjustments have been made to other requirements. In section 6, you find a table showing all the main changes that have been done in the criteria document after the consultation.

Nordic Ecolabelling has in section 4 given a response to all comments and described if the requirement has been adjusted.

2 About the consultation

This document consists of feedback received during the public sub consultation for revised criteria for laundry detergents and stain removers, and Nordic Ecolabelling's response to this feedback. The purpose of this document is to show how external feedback has affected the development of the draft criteria in compliance with the ISO 14024 standard.

Nordic Ecolabelling is grateful for all incoming input that helped us in the development of both ambitious environmental as well as market based draft criteria for laundry detergents and stain removers.

The sub consultation on revising the criteria for laundry detergents and stain removers has been conducted with stakeholders in all Nordic countries as well as with stakeholders in some other European countries in the period from February 4 – April 14, 2019. The consultation has been divided into three sub processes, each dealing with one or several specific topics, in three separate sub consultation periods. The topics in the three sub consultation periods were:

1. Packaging and recycling
2. Correct dosing, ecotoxicity and efficiency
3. Sustainable renewable raw materials and microplastics.

The first sub consultation was sent to all identified stakeholders in the Nordic region as well to as stakeholders in some other European countries. The second and third sub consultations were only sent to selected stakeholders, as well as to those who had actively signed up to participate in the consultation process.

Documents containing proposed requirement for all three sub processes are located on: <http://www.nordic-ecolabel.org/criteria-revisions/laundry-detergents/>

After the three sub consultation periods, Nordic Ecolabelling drafted a proposal for criteria for laundry detergents and stain removers, based on the received feedback, for a final public consulting period.

The consultation for the final draft criteria for laundry detergents and stain removers, generation 8, is planned to take place August 12 – September 8, 2019.

3 Compilation of incoming comments and feedback

Table 1: Stakeholder consultation comments on the first sub process: Packaging and recycling.

Consulting party	A. Just commenting.	B. Supports the proposal.	C. Supports the proposal with comments.	D. Refrains from commenting.	E. Rejects the proposal with justification.
BlueSun	x				
Cleano Production AB	x				
Dansk Vask-, Kosmetik- og Husholdningsindustri	x				
Diversey	x				
Forbrugerrådet Tænk Kemi	x				
Förpacknings- och Tidningsinsamlingen, FTI	x				
Kemikalieinspektionen			x		
KiiltoClean Oy	x				
Kosmetik- och hygienföretagen					x
Kosmetik- og hygiejnebranchen	x				
Mayeri Industries AS	x				
McBride plc	x				
Mepex Consult AS and Grønt Punkt Norge	x				
Ministry of Environment and Food of Denmark	x				
Orkla Home&Personal Care	x				
Reckitt Benckiser	x				
Suomen Uusiomuovi Oy/Finlands Plastretur Ab	x				
Sveriges Kommuner och Landsting				x	
Unilever Sverige AB	x				

Table 2: Stakeholder consultation comments on the second sub process:

Consulting party	A. Just commenting.	B. Supports the proposal.	C. Supports the proposal with comments.	D. Refrains from commenting.	E. Rejects the proposal with justification.
BlueSun	x				
Center For Testmaterials BV	x				
Coop Norge Handel AS	x				
Coop Danmark A/S	x				
Coop Trading A/S	x				
Diversey	x				
Kosmetik- och hygienföretagen					x
Mayeri Industries AS	x				
McBride plc	x				
Nopa Nordic	x				
Novozymes A/S	x				
Orkla Home&Personal Care	x				
Reckitt Benckiser	x				
SGS Institut Fresenius GmbH	x				
Senzora bv		x			
Svenskt Vatten	x				
Upphandlingsmyndigheten			x		
wfk - Institut für Angewandte Forschung GmbH	x				

Table 3: Stakeholder consultation comments on the third sub process:

Consulting party	A. Just commenting.	B. Supports the proposal.	C. Supports the proposal with comments.	D. Refrains from commenting.	E. Rejects the proposal with justification.
Blue Sun	x				
Brenntag Nordic A/S	x				
The Danish Association of Cosmetics and Detergents	x				
KiiltoClean Oy	x				
Konsumentverket	x				
Kosmetik- och hygienföretagen					x
Naturvårdsverket				x	
Nopa Nordic	x				
Nouryon	x				
Novozymes A/S	x				
Orkla Home & Personal Care	x				
Rainforest Foundation Norway	x				
Senzora bv	x				
Svenskt Vatten	x				
Upphandlingsmyndigheten			x		

4 Comments to the criteria in detail

The various comments from the consultation parties have been inserted below and grouped in relation to the specific requirements. Nordic Ecolabelling has given a response to all comments and described if the requirement has been adjusted. In section 6, you find a table showing all the main changes that has been done in the criteria document after the consultation.

4.1 Sub consultation 1: Packaging and recycling

Mayeri Industries AS

Although we agree that you are moving on the right direction with this one, to minimize the amount of virgin plastic used and also to provide more attention to recycling.

And we really hope, that the recycled materials will get cheaper in 2 years, because at the moment this has quit big impact to the product price. As the packaging material suppliers are not so sure, that the prices will start to fall, as the recycling is still quite expensive.

Comments from Nordic Ecolabelling

Thank you for your supportive comment and your general comment about price. Your other comments have been answered under the corresponding requirement (see further down).

Orkla Home&Personal Care

Det kommer til å være en stor utvikling i teknologi og prosess med hensyn til sortering og gjenvinning i årene fremover. Det gjør det spesielt utfordrende å sette krav nå tre før kravene trer i kraft. Det er derfor viktig at krav som settes nå kan justeres og endres slik at de representerer teknologi/prosess på tidspunktet de gjøres gjeldende.

Comments from Nordic Ecolabelling

Nordisk Miljømerking er enig i at dette er en utfordring, og vil forsøke å stille krav som forblir relevante i tråd med utvikling av teknologi/prosess.

Forbrugerrådet Tænk Kemi

Vi har ikke kommentarer til de krav I stiller i forhold til materiale mv. til emballagen.

Vi vil dog anbefale, at I også stiller krav til de kemikalier der anvendes til tryk. Eks. i stil med jeres krav til tryksager.

Yderligere kunne I overveje at stille krav til, at der på emballagen skal være angivet en full ingrediensliste. [Hvis det er dette afsnit det passer ind i?]

Comments from Nordic Ecolabelling

Nordisk Miljømerking takker for deres innspill. Vi vil ikke stille krav til trykkjemikalier, da det er utenfor kjerneområdene for denne produktgruppen. Merk at vi stiller krav til trykkjemikalier i andre produktgrupper der det er mer sentralt, som for eksempel i Svanemerking av trykkerier og trykksaker, emballasje for flytende næringsmidler og engangsartikler til mat.

Kosmetik- och hygienföretagen

Kosmetik- och hygienföretagen vill lämna följande synpunkter:

Vi stödjer inte förslaget till kriterier.

Vi anser att det är för kort om tid med endast 14 dagars remisstid. Vi anser att remissinstanserna ska få åtminstone 1 månad på sig att gå igenom förslaget för att kunna ge välgrundade synpunkter för att bedöma eventuella konsekvenser. Det är positivt att man har försökt dela upp remissarbetet över tid, samtidigt som det gör det svårare att överblicka den totala konsekvensen av förslagen till ändringar i kriterierna.

Comments from Nordic Ecolabelling

Nordisk Miljømerking takker for deres innspill. Vi gjør samtidig oppmerksom på at i tillegg til 14 dagers høringsperiode for alle delhøringene, vil det være 4 ukers høringsperiode på det endelige kriterieforslaget.

Vi ska utvärdera processen efter att vi är färdiga med projektet och tar hänsyn till er kommentar i beslutet om fortsatt arbetssätt i revisioner.

O1 Consumer guidance on packaging

BlueSun

It must be stated on the packaging how it should be recycled in each Nordic country where it is sold. Text or symbols can be used. This Requirement is viable, but it will be challenging due to lack of space we have on our labels, currently most products sold to the Nordics countries have 4 languages on the Label. Maybe there could be an exception, to include the recycling instructions on our Website due to lack of space.

Comments from Nordic Ecolabelling

Thank you for your support. We understand the lack of space in the packaging. But since we believe this is very important, we will propose this requirement also in the final consultation proposal. Would it be possible to use pictograms and save space in that way?

Kosmetik- og hygiejnebranchen

The current regulatory labels are already overloaded with regulatory information requirements and not very effective in driving the safe use by consumer or to understand for the consumer. In a study AISE assessed alternative labels, consumer understanding and preference. The conclusion was that consumer preferred simpler labels (less texts, key basic safe use information, etc.), see the results here: https://www.aise.eu/documents/document/20180115095651-aise_expo_061217_advocacy_bres_factsheet_final.pdf . Therefore, more text on the label will confuse consumers even more.

Comments from Nordic Ecolabelling

We understand the lack of space in the packaging. But since we believe this information is very important in order to boost correct recycling, we will propose this requirement also in the final consultation proposal.

Kosmetik- och hygienföretagen

Vi bedömer att denna information, som t.ex. sorteringsanvisningar, redan finns på förpackningarna i mycket stor utsträckning. Att kräva ytterligare information på alla relevanta länders språk gör att det blir ännu mindre plats för övrig information. Sorteringsanvisningar kan också skilja sig åt mellan olika länder och regioner varför det blir svårt att ha en gemensam nordisk information. Av säkerhetsskäl och för att förpackningen ska vara tät så används olika material i förpackning och lock. Men då är också de olika plasterna märkta var för sig med vilket plastmaterial de innehåller.

Vi anser att detta krav ska strykas.

Comments from Nordic Ecolabelling

Nordic Ecolabelling thanks you for your comments. We acknowledge that there is already a considerable load of information on the label.

Nordic Ecolabelling would like to clarify that “how the packaging should be recycled” should be understood as how it should be sorted by the consumer. While this applies for each Nordic Country where it is sold, please note that in case the same way of sorting applies for several countries, it will be sufficient to state the information only once, if symbols are used (eg. plastic sorting symbol for packaging that should be sorted as plastics).

Mayeri Industries AS

Also, about the recycling information on the label, will there be some information provided for us, about the recycling requirements in different Nordic countries? It will help us to find this kind of information faster and also to provide always the correct information on the labels.

Comments from Nordic Ecolabelling

Nordic Ecolabelling thanks you for your comments. “How the packaging should be recycled” should be understood as how it should be sorted by the consumer (eg. you must indicate the material type on the label). While this applies for each Nordic Country where it is sold, please note that in case the same way of sorting applies for several countries, it will be sufficient to state the information only once, if symbols are used (eg. plastic sorting symbol for packaging that should be sorted as plastics).

McBride plc

Difficult to implement for the following reasons:

- 1) We are not aware of recycling methods for each Nordic country
- 2) We can't have recycling instructions based on country of sales as it will add complexity to our manufacturing processes.

In addition if recycling instructions are needed on the packaging, investment will be required for new tools to be able to do this in-line. Very costly to the business and it is unlikely the company would go ahead with the investment.

Comments from Nordic Ecolabelling

There might have been a misunderstanding of our intentions. Nordic Ecolabelling would like to clarify that “how the packaging should be recycled” should be understood as how it should be sorted by the consumer. While this applies for each Nordic Country where it is sold, please note that in case the same way of sorting applies for several countries, it will be sufficient to state the information only once, if symbols are used (eg. plastic sorting symbol for packaging that should be sorted as plastics).

Reckitt Benckiser

It must be stated on the packaging how it should be recycled in each Nordic country where it is sold. Text or symbols can be used.

- It is already stated on-pack the plastic type of packaging, in accordance to Commission Decision 97/129/EC of 28 January 1997 or ISO 11469:2000 Plastics 1 - Generic identification and marking of plastics products or similar. Additional information is unrealistic as in many cases packaging have multiple languages (DK, SE, NO, FI) and it is not possible to add more. (see picture at the bottom)

If box/bottle/container and closure are of different materials, it must be stated on the packaging that cap/closure should be removed and both be recycled. Text or symbols can be used.

- There is a huge challenge on having same plastic for bottle and cap, while maintaining the current level of consumer safety. Dedicating text for separation is not feasible as in most cases multiple languages (DK, SE, NO, FI) leads to very constraint space.

Currently both the container and labels are appropriately labelled by having plastic type written on it according to Commission Decision 97/129/EC of 28 January 1997 or ISO 11469:2000 Plastics Reco: Consumer education to separate lid from container is more valuable and stronger impact. As having one plastic type for all packaging leads to high consumer safety risk as of right now.



Comments from Nordic Ecolabelling

Nordic Ecolabelling thanks you for your comments. “How the packaging should be recycled” should be understood as how it should be sorted by the consumer (eg. you must indicate the material type on the label). While this applies for each Nordic Country where it is sold, please note that in case the same way of sorting applies for several countries, it will be sufficient to state the information only once, if symbols are

used (eg. plastic sorting symbol for packaging that should be sorted as plastics). We will delete the requirement that cap/closure should be removed.

BlueSun

If box/bottle/container and closure are of different materials, it must be stated on the packaging that cap/closure should be removed and both be recycled. Text or symbols can be used. This Requirement is viable, but it will be challenging due to lack of space we have on our labels, currently most products sold to the Nordics countries have 4 languages on the Label. Maybe there could be an exception, to include the recycling instructions on our Website due to lack of space.

Orkla Home&Personal Care

Våre erfaringer fra diverse besøk av sorteringsanlegg er at det vil være uheldig å fjerne korkene fra flaskene. Korkene vil da være så små at de faller gjennom gitter (40-60mm åpning avhengig av anlegg) og går direkte til energigjenvinning. Om de sitter igjen på flaskene så vil de tas med videre i plastfraksjonen og kan hentes ut som "forurensning" i renseanlegg men derfra sorteres som plast slik at materialet går til gjenvinning. Dessuten vil det være en fordel for vaskeanlegg om denne type flasker har rester av rengjøringsmiddelet igjen. Da slipper de å tilsette like mye vaskemiddel i prosessen. Så om korkene fjernes vil mer av disse restene renne ut i de forskjellige prosessene før den ankommer vaskeanlegg. Korkene vil forøvrig enkelt sorteres ut i et "float /sink" anlegg for PET/PE(PP) kombinasjoner. I en PE/PP kombinasjon så vil den lille andelen PP i en PE fraksjon ikke ha noen negativ påvirkning (begge polyolefiner).

Mepex Consult AS and Grønt Punkt Norge

We do not recommend the general requirement that all packaging shall be marked indicating that the closure system shall be removed from the packaging product. This will lead to a decrease in the recycling rate of the small lids and caps as items smaller than 50-60 mm are removed from the recycling stream through a screening process and sent to incineration. If the caps follow to next step with washing and separation before recycling there is a possibility that recycling is achieved also for the caps. Caps in other materials than mail packaging, will normally not have negative effect on recycling quality.

Furthermore, lids and caps etc. should always be attached to the packaging product to reduce marine litter. Products are now being designed where the cap will stay attached to the bottle.

Comments from Nordic Ecolabelling

Nordic Ecolabelling thanks you for your comments. Since there are differences in the sorting/recycling advice in different Nordic countries, we will delete the requirement that cap/closure should be removed.

O2 Recycling and recycled material in packaging

BlueSun

All hard-plastic packaging must contain minimum 75 % (by weight) post-consumer recycled material (PCR). This is not a viable requirement, currently we are working on obtain more PCR on our packaging, but we have been advised that the maximum

we can reach is 30% for detergent products, due to a technical standard and the material properties of the packaging. We cannot confirm that are packaging will maintain its functions during a long-term period with 75% PCR. Lately there has been a tendency to use Bio-Material packaging. If will this be considered as pate of the PCR %?

Paper/cardboard-based packaging must contain minimum 90 % (by weight) post-consumer recycled material (PCR). This Requirement is viable.

Comments from Nordic Ecolabelling

We have added a definition of PCR according to ISO 14021:

“Post-consumer/commercial” is defined as material generated by households or by commercial, industrial and institutional facilities in their role as end-users of the product, which can no longer be used for its intended purpose. This includes returns of material from the distribution chain.

We have also adjusted the limits of recycled materials and look forward to comments on the new limits.

We have decided to not promote the use of renewable resources in packaging for laundry detergents. It is however not excluded either. Nordic Ecolabelling believes that if renewable raw materials are promoted, it must be made sure that they are also produced sustainably. We also think that renewable plastics are better used in food packaging and that recycled plastics serve better in non food.

Cleano Production AB

Det enda vi reagerar på är O2. Detta med att hård-plastförpackningar måste innehåller minst 75% konsumentåtervunnen plast. Så mycket återvunnen plast går inte att få tag på i dagsläget. Det kommer att vara omöjligt att producera de kvantiteter som krävs. Det bli i så fall endast ”små, små” kunder som kan ha Svanen på sina produkter. Vill dessutom poängtera att Sverige idag importerar konsumentåtervunnen plast för tillverkning av flaskor/material. Är detta taget i beaktande vid framtagning av kriterierna. Kunder som ICA, COOP, Axfood m.fl. har alltför stora volymer på sina produkter för att kunna ha Svanen i så fall.

Gällande kartonger med 90% återvunnet material. Vi kan inte ha så mycket återvunnet material i våra förpackningar. De tvättmedel vi har som har Svanen håller mycket hög kvalitet och innehåller därför mycket tensider. Förpackningen håller inte samma goda kvalitet med så mycket återvunnet material. Dessutom krävs en plastlaminerad insida för att medlet inte ska blöda igenom förpackningen och därmed förstöra produkten.

Comments from Nordic Ecolabelling

We have adjusted the limits of recycled materials and look forward to comments on the new limits.

Dansk Vask-, Kosmetik- og Husholdningsindustri

Hvordan definerer I PCR? Hvad med industri affald?

Vi foreslår, at der skal være mulighed for at bruge fornybare ressourcer til en vis grad, for at sikre den tekniske kvalitet fremover, da der med tiden vil være en meget

stor andel af gen-brugt emballage på markedet. Det skal være af ikke bionedbrydelig, da det bionedbrydelige, ikke er så godt et materiale at få med i returemballagen. For at sikre, at det materiale, man bruger til genbrugsemballage er godt nok, er det nødvendigt, at det indeholder noget brugt virgin materiale. Hvis dette virgin materiale bliver lavet af råvarer af fornybare ressourcer, så er det win win.

75% genbrugsmateriale i hard-plastic packaging er ok for alm. emballager til f.eks. flydende vask. Men for flydende pletfjerner, som er en lille emballage med en trigger, så er niveauet højt. Her vil det passe bedre med 50% genbrug. Spraypistoler er begyndt at blive lavet i gen-brugsmateriale, ca. 30 %, men de mange små dele inden i pumpen, er meget svære at erstatte med genbugsmateriale.

Papir/pap: for de små emballager er det ok med 90%, men for de større, fra 3 kg, er det nær-mere 70% genbrugsmateriale, der er realistisk. De større emballager er lavet af bølgepap og er ikke stærke nok ved en højere mængde genbrugsmateriale.

- *Documentation showing that the primary packaging is recyclable. Define which recovery methods are possible*

Hvad er det for en dokumentation I spørger til? Er det DIN mærkning?

Comments from Nordic Ecolabelling

We have decided to not promote the use of renewable resources in packaging for laundry detergents. It is however not excluded either. Nordic Ecolabelling believes that if renewable raw materials are promoted, it must be made sure that they are also produced sustainably. We also think that renewable plastics are better used in food packaging and that recycled plastics serve better in non food.

We have added a definition of PCR according to ISO 14021: "Post-consumer/commercial" is defined as material generated by households or by commercial, industrial and institutional facilities in their role as end-users of the product, which can no longer be used for its intended purpose. This includes returns of material from the distribution chain.

We have also adjusted the limits of recycled materials and look forward to comments on the new limits.

We have also reformulated the requirement that packaging must be recyclable and only focus on the main materials and not e.g. the paper label on plastic packaging.

Diversey

75% recycled plastic:

- This is a new requirement. I think 50% PCR would be a better start and to increase it further. HDPE is the one where the %PCR is more visible (by the customers) in the greyness of the bottle. Some types of plastic are more advanced in the use of the recycled plastic such as PET, not really for the HDPE so 50 % would be a good compromise for initial criteria if we keep all plastic together, manufacturing and customer perception.

Comments from Nordic Ecolabelling

Thank you for your feedback. We have adjusted the limits of recycled materials and look forward to comments on the new limits.

Kosmetik- och hygienföretagen

Det är inte realistiskt att förpackningar av hårdplast ska innehålla 75 % återvunnet material. Med den mängden återvunnet material skulle plasten bli för spröd och inte klara det "drop-test" som är ett krav för kemiska produkter. Det är också en fråga om tillgång på återvunnet material, där vi bedömer att det inte finns tillräcklig tillgång på återvunnet material för att kunna införa detta krav nu.

Vi anser att kravet på återvunnet material ska införas gradvis och att man börjar med krav på förpackningen och tar lock och korkar i ett senare skede.

För förpackningar av PET är det eventuellt möjligt att klara 75 % återvunnet material och för förpackningar av kartong är det möjligt att klara 90 % återvunnet material.

Comments from Nordic Ecolabelling

Thank you for your feedback. We have adjusted the limits of recycled materials and look forward to comments on the new limits.

KiiltoClean Oy

- *All hard-plastic packaging must contain minimum 75 % (by weight) post-consumer recycled material (PCR).*

We suggest that the requirement is consistent with the criteria for cleaning products, i.e. there is no need to use recycled plastic, but is promoted in the WUR-calculation. Our reasoning: Tension cracking can be a problem if the recycled plastic is of insufficient quality. There are also problems with the availability of recycled plastic. There should be no requirement for recycled plastic in the closure for technical reasons.

- *Paper/cardboard-based packaging must contain minimum 90 % (by weight) post-consumer recycled material (PCR).*

Recycled fiber absorbs moisture more than virgin fiber. Can it happen that you have to use plastic coating in cardboard packaging?

Comments from Nordic Ecolabelling

Thank you for your feedback. We have adjusted the limits of recycled materials and look forward to comments on the new limits.

McBride plc

It must be possible to recycle primary packaging in today's existing material recirculation systems in the Nordic countries. Incineration with energy recovery is not considered to be material recovery. Currently some of our skillets are a PE laminate paper board, and almost all McBride NS-labelled products in Denmark are packaged in cardboard skillets with PE barrier. Can Nordic Swan help with providing information if this type of packaging can be recycled in all Nordic countries? Currently this is not possible within the UK.

All hard plastic packaging must contain 75% PCR. Very difficult requirement to meet as plastic PE bottles with 75% PCR is not yet available with our suppliers. Clarity needed if this requirement is for all hard plastic components separately or together. If separately and it means the cap as well should be 75% PCR min, it will be a huge issue to apply for our Caps, as this is not the standard for any of our Cap suppliers.

Paper/cardboard based packaging must contain minimum 90% PCR. Carboard – boxes minimum of 90% PCR and for us it is not the case as we are around 70-80%. Additionally, our paper labels are all using virgin paper.

Comments from Nordic Ecolabelling

Thank you for your feedback. We have also reformulated the requirement that packaging must be recyclable and only focus on the main materials and not e.g. the paper label on plastic packaging or plastic barrier on cardboard packaging.

We have also adjusted the limits of recycled materials and look forward to comments on the new limits and look forward to your feedback on the new limits.

Orkla Home&Personal Care

Her trenger vi en god definisjon på hva slags resirkulert materiale som kan godkjennes. Pre-consumer recycled bør også inkluderes. Det teller positivt på den sirkulære økonomien om slikt plastavfall inngår i et sirkulært kretsløp. Om en prosess genererer et plastavfall som ikke kan puttes tilbake i samme prosess, men leveres som et avfall til noen som kan konvertere dette tilbake til en råvare, så er dette positivt for miljøet og helt i tråd med prinsippene bak sirkulærøkonomien.

Documentation showing that the primary packaging is recyclable. Define which recovery methods are possible.

En slik prosess må standardiseres. Det er dessverre stor forskjell fra anlegg til anlegg hvordan sorteringsevnene er. Dette kan også endre seg over tid til et anlegg da justeringer gjøres kontinuerlig for å tilpasse prosessen til innkommet råvare. F. eks. rundt Juletider vil et sorteringsanlegg justere seg inn for å hente mest mulig sessongrelaterte produkter. F.eks. pepperkakebokser.

The waste phase is influenced by many factors, such as sorting opportunities in each country or municipality, and how the consumer ultimately sorts waste [O2]. Generell betraktning som er viktig å ha med seg i vurderingen av kravsett fremover. I 2021 vil Norge ha en stor andel sentralsortering av plastavfallet (tilsvarende anleggene til ROAF, IVAR og SESAM) og vi er ikke lenger avhengig av at forbruker kildesorterer plasten. Alt avfallet vil da bli optisk lest med NIR-sensorer på mottaket.

The requirement [O2] applies only to hard plastic and paper/cardboard packaging and not flexible plastic pouches/bags. In the latter the challenge is still to find monomaterial that works, and recycled material will be a future challenge. Det er stadig flere leverandører som lanserer monomaterial laminat som kan fungere til denne produktkategorien. Så innen 2021 vil dette være naturlig å tenke at slike fleksible materialer vil være tilgjengelig for en rekke produkter.

Comments from Nordic Ecolabelling

Thank you for your feedback.

We have added a definition of PCR according to ISO 14021:

"Post-consumer/commercial" is defined as material generated by households or by commercial, industrial and institutional facilities in their role as end-users of the product, which can no longer be used for its intended purpose. This includes returns of material from the distribution chain.

We have also reformulated the requirement that packaging must be recyclable and only focus on the main materials and not e.g. the paper label on plastic packaging.

We have also adjusted the limits of recycled materials and look forward to comments on the new limits.

Reckitt Benckiser

All hard-plastic packaging must contain minimum 75 % (by weight) postconsumer recycled material (PCR).

- The main challenge is that introducing high amounts of PCR makes the plastic very crisp and it can not pass the "Drop-Test" which is requirement for chemical products.
- We are in constant contact with our procurement / quality to identify the best sources in market for recycled content. Due to high volumes of products it is very hard to obtain a supplier able to deliver those quantities while ensuring that quality is maintained. Our Reco is 30% in containers as PCR industry is still in developing phase leading to constraints towards consistent supply and quality of plastic.
- For Caps/Lids the PCR stream is a lot smaller and many high risk challenges due to the injection process. As the main component of packaging is bottle/container(+60%), Our reco is to introduce 30% in containers.

The lids are approx. 30% of the entire weight of the packaging, this would mean that the container needs to consist of 100% PCR for the target of 75 % of total packaging even be realistic. This is not feasible as there are many challenges on the technology to develop this and to find a consistent supply/quality of PCR.

RECO: NS to introduce a step-by-step process to increase PCR in products during the period the new criteria will be enforced.

Documentation showing that the primary packaging is recyclable. Define which recovery methods are possible.

- How can the industry define recovery methods ? If the plastic type is handled by a recycling plant then it cannot be required by the industry to investigate how recycling plants can operate.

Comments from Nordic Ecolabelling

Thank you for your input. We have also reformulated the requirement that packaging must be recyclable and only focus on the main materials and not e.g. the paper label on plastic packaging. We have also adjusted the limits of recycled materials and look forward to comments on the new limits and look forward to your feedback on the new limits.

Unilever Sverige AB

- *It must be possible to recycle primary packaging* ** The packaging includes box/bottle/container/flexible pouches, labels and closures (e.g. caps, lids).*

What does this mean? Does it have to be 100% recyclable? Is it ok to have a paper label on a plastic bottle? The paper label will then not be recycled. To move to plastic label will be more expensive and challenging. This could potentially require new equipment and issues on the production line. From Requirement O3 I understand that paper label will be acceptable on plastic bottles, but criteria is unclear.

- *All hard-plastic packaging must contain minimum 75 % (by weight) postconsumer recycled material (PCR).*

Is this 75% of the total packaging or by individual component?

With the technologies and material available to us today this is not possible for us to comply with.

The amount of recycled material replacing virgin polymer within the bottles depends on the materials used, product contained and design of the type of pack as well as the availability and quality of PCR. For PET 100% is commonly possible but for HDPE this would have to be trialed as different applications are more sensitive to inclusion rates. Especially bigger bottles have issues with quality and cannot safely hold the content. We are currently running trials, but today we are not able to produce safe HDPE packs with 75% PCR.

PET bottles are possible within laundry detergents; however, challenges in how we incorporate into the design a way for the consumer to handle the pack when pouring. This is especially for larger pack sizes.

It is more of a challenge using recycled materials in closures, depending on the availability and suitability of PP/ HDPE PCR grades, the % used and design of the component. Closures tend to be more complex in design and manufactured and hence the control of the polymers used needs to be very consistent. Although it is possible to produce closures with PCR and trials are happening to include PCR, we have no stable option available today.

Due to the challenges with PCR levels in PE packaging and the challenges with PET bottles we suggest to have a PCR requirement that is an average across the bottles sold in the market at 50%.

- *Documentation showing that the primary packaging is recyclable. Define which recovery methods are possible.*

What kind of documentation are you asking for? This could potentially be very difficult/time consuming to get, depending on what is required.

Comments from Nordic Ecolabelling

Thank you for your input. We have also reformulated the requirement that packaging must be recyclable and only focus on the main materials and not e.g. the paper label on plastic packaging. We have also adjusted the limits of recycled materials and look forward to comments on the new limits and look forward to your feedback on the new limits.

Suomen Uusiomuovi Oy/Finlands Plastretur Ab

Beside looking at recyclability we are also consider circularity since it is very important that we have enough end use products for

the waste we collect and process. Detergent bottles are a very good end use product for plastic packaging waste. We respond to the section for hard plastics:

1) In the specification it is not clear what is the source of the PCR. Since the biggest challenge for end use is the household packaging (HH) waste, we suggest that for that PCR the content would not be 75 % but lower, for ex 40 %. In this way encouraging companies to use PCR from HH waste. If it is waste from trade&industry or plastic products the share can be 75 % if it provides all the quality requirements for this kind of packaging (first criteria).

Comments from Nordic Ecolabelling

We have added a definition of PCR according to ISO 14021:

"Post-consumer/commercial" is defined as material generated by households or by commercial, industrial and institutional facilities in their role as end-users of the product, which can no longer be used for its intended purpose. This includes returns of material from the distribution chain.

We have also adjusted the limit value for recycled materials and look forward to your comments on these both.

Ministry of Environment and Food of Denmark

Support to criteria on recyclability and recycled content.

Comments from Nordic Ecolabelling

Thank you for your support.

O3 Design for recycling of plastic packaging (except pouches)

Kemikalieinspektionen

Kemikalieinspektionen är positiv till det nya kriterieförslaget 03: "Design för recycling of plastic packaging."

Comments from Nordic Ecolabelling

Tack för stödet.

A common answer to all stakeholders can be found after the comments below.

BlueSun

- *The plastic packaging (excluding label) must be made from Polyethylene (PE), Polypropylene (PP) or Polyethylene terephthalate (PET). This Requirement is viable.*
- *Only white pigment can be added to the box/bottle/container. Do Labels also fall under this requirement? Is Printing color allowed on the Surface?*
- *Black pigments cannot be added to the closures. This Requirement is viable.*
- *Metal must not be part of the packaging (box/bottle/container, closure or label). This is viable for Liquid products, but for big formats of Powder Products, we add a handle on the packaging to make it easier for our consumers to transport the product and this is attached on the packaging using a rivet made form metal.*

- *PS and PVC or plastics based on other types of halogenated polymers must not be present in the label. This Requirement is viable.*
- *Labels/shrink film labels may not cover more than a maximum of 60% of the surface of the box/bottle/container. The calculation of the percentage shall be based on the two-dimensional profile of the box/bottle/container. If the label on the front of pack and back of pack are of different size, the maximum percentage of 60% shall be fulfilled for each side separately. The area of the top and bottom of the box/bottle/container shall not be included in the calculation. An exemption to the maximum requirement of 60% applies if the label/shrink film label is made of the same plastic as the bottle. If exemption is used, it must be documented by a test at a sorting facility that the NIR sensor reads and sorts the box/bottle/container to the correct plastic fraction despite the label. This Requirement is viable, as we fall under the exemption.*

Dansk Vask-, Kosmetik- og Husholdningsindustri

Only white pigment can be added to the box/bottle/container.

Det bliver kedelige produkter og svært at differentiere sig! Vi har fået oplyst, at det nu er muligt at sortere sort plast ved hjælp af NIR.

Metal must not be part of the packaging (box/bottle/container, closure or label).

Ok, for dette kriterie, men et problem for håndsæbe.

Labels/shrink film

Her bliver det svært at have alle de lovpligtige oplysninger på etiketten og kan presse os hen imod folde-ud etiketter. Folde-ud etiketter kan man kun få i papir eller PP, hvilket giver problemer hvis etiket og emballage helst skal være af samme materiale.

Vi har ikke nået at undersøge, hvad en NIR analyse koster, men tænker at hvis man vil fremme brugen af flaske og etiket af samme emballage, så skal man måske nøjes med at give kredit for det. Etiketter af samme materiale som flasken er meget dyrere og giver problemer i produktionen. Det betyder, at vi skal bruge mere energi i produktionen for at sætte sådanne labels på. Samtidig vil farven fra etiketten komme med i genbrugsfraktionen og dermed farve genbrugsemballagen. Afvask af papiretiketter er ikke længere et problem, og så undgår man den ekstra farve fra etiketten i genbrugsfraktionen.

Diversey

Composition

- The plastic packaging (excluding label) must be made from Polyethylene (PE), Polypropylene (PP) or Polyethylene terephthalate (PET). For some packaging: for dosing aid, I am not sure if we can replace it by 2021 as it is there for a design reason to chose for something different than PP PE or PET.

60% cover by the label

- 60%: needs to be assessed. Add an extra check on labels but also need to agree on how to measure it.
- Exemption of the 60% by a test at the sorting facility for the NIR: this sounds difficult to implement: it would be a down time for both parties only to check

for the criteria. I am afraid companies would prefer to just delist their products unfortunately

- Exemption if same plastic: do you confirm that label LDPE would be exempted on bottle HDPE as both are PE?

Metal

- It seems fine for this category of products but if there is a dosing aid, metal could be there because of the spring.

Förpacknings- och Tidningsinsamlingen, FTI

- Första punkten handlar om materialval. Här tycker FTI att kravet för att få använda PET ska vara att förpackningen är helt ofärgad. Post konsumentförpackningar av PET är en förpackningstyp som inte är helt enkelt att materialåtervinna. När den nya sorteringsanläggningen i Motala kommer igång är det endast ofärgade formlåsta (typ flaskor och burkar med skruvlock) PET-förpackningar som kommer att kunna materialåtervinnas, inga andra PET-förpackningar. Det är ändå ett steg framåt från idag då inga PET-förpackningar (förutom pantflaskor) kan materialåtervinnas.
- Ni bör ha med en punkt som säger att man bara ska använda monomaterial, inga laminat (som ni säger om flexibla förpackningar (O4)).
- Saknar krav på etiketter: Etiketter ska vara tillverkade i samma material som själva förpackningen. Viktigt att poängtera att en etikett i PETG ej är ok till en PET-förpackning.

Kosmetik- och hygienföretagen

Att enbart få tillsätta vitt pigment går inte ihop med kravet på återvunnet material i förpackningarna. Återvunnet material i förpackningen kommer att påverka dess färg varför det behövs kunna tillsättas andra pigment för att förpackningen ska vara tilltalande för konsumenten.

Vi bedömer att kraven gällande etiketter och krympfilm inte är möjliga att uppfylla. En krympfilm är typiskt av annan plast än själva förpackningen och täcker normalt sett mer än 60 % av förpackningen. Om kraven på att endast vita eller transparenta förpackningar får användas är branschen beroende av att kunna använda krympfilm på förpackningarna.

Vi tror att fler företag kommer att införa text eller symbol som visar på att man ska dra av krympfilmen vid återvinning av förpackningen. Detta tror vi kommer att gälla alla förpackningar i branschen framöver eftersom det är ett branschgemensamt EU-projekt på gång inom detta område. Det skulle tala för att tillåta annan plast i krympfilmen och att krympfilmen får täcka större delen av förpackningen.

Det är mycket information som ska skrivas på etiketterna på grund av lagkrav, det går inte att göra etiketterna mindre än de är idag.

Vi ser också att Svanen avser att starta ett projekt för att utreda mer kring etiketter. Vi tror att detta projekt bör genomföras innan man sätter skarpa krav på etiketter och krympfilm. KoHF är gärna delaktig i projektet.

Kosmetik- og hygiejnebranchen

Regarding the criteria '*Labels/shrink film labels may not cover more than a maximum of 60 % of the surface of the box/bottle/container*':

The CLP regulation set the classification and labelling requirements for hazardous substances and mixtures and thereby also the dimensions of the label (Annex I). We find it critical that label size requirements are made, and at the same time more text is required for telling how to recycle the packaging the correct way. The use of icons or infographics on how to recycle the product should be considered instead of more text.

KiiltoClean Oy

Kommentti: Why would a NIR experiment be needed if the label is of the same material as the bottle? Organizing an NIR experiment is practically impossible

McBride plc

Criteria on transparent and white colour bottles - clarity needed if any other colours are permitted. e.g. lighter colours such as green, yellow.

Sleeve only covering 60% of the bottle, for us it is not the current situation - is this applicable for labels made of plastic only? Is there an exemption for paper labels? Does the inside also count in the surface calculation?

What worries the company the most is multiplication of certifications, for example the company does not have the resource in terms of people or finance to organise testing at sorting facilities to acquire the NIR certificate for each new product / label.

Mepex Consult AS and Grønt Punkt Norge

Sleeve and labels

The rule that the sleeve/label should be in the same material as the packaging product if the 60 % requirement is breached is well suited for PE and PP, however this is not well suited for PET. In general, it should be considered whether PET with a sleeve/label that covers more than 60 % of the packaging product should receive ecolabelling. PETg from sleeve have other properties than PET in bottle and can be hard to separate in washing/separation processes. PET sleeves is not wanted by PET-recyclers and Infinitum have roles that PANT-bottles should not have PET sleeve.

Testing of products recyclability

It is challenging to perform tests in sorting plants without a more detailed description of the procedure of how to do so. Similarly, it is challenging to document recyclability without being clear on how this is to be documented. We can expect that there will be more unified methods before the new eco-labelling requirements will be in place.

White colour

We are uncertain of whether the recommendation of white colouring is advantageous. The white pigment contains titanium dioxide which could pose a challenge. Opaque, white PET can especially pose a challenge in sorting plants. Clear packaging (with different colour tones) could be just as suited, especially for PET.

There is normally no colour sorting today for HDPE and PP, so white and coloured HDPE and PP will be mixed with other colours, and so far, there is a market demand for mixed colours. It is possible that colour separation will be more common in the future, and white packaging for laundry detergents and stain removers could then be recycled back into a products of similar colours.

Black and NIR

In terms of the recommendation to avoid black colour, it should be emphasized that this only includes black colour that is not detectable by NIR technology. Carbon black is the common pigment used that is not NIR-detectable, however there are black pigments that are detectable and can be sorted in today's sorting plants. This is probably not relevant for lids and caps as these will originally not be sorted using NIR.

Orkla Home&Personal Care

Only white pigment can be added to the box/bottle/container.

Når det gjelder hvite pigmenter så er det stort sett brukt Titanium Dioxide. Det er en diskusjon om hvorvidt dette stoffet har uheldige påvirkninger, så det må tas hensyn til før et eventuelt slikt krav blir godkjent. I dialog med verdikjeden så har vi ikke fått noen inntrykk at bruk av hvitt pigment vil øke kvaliteten på granulat hos gjenvinner. Så vi stiller oss litt spørrende til dette kravet.

Black pigments cannot be added to the closures.

Fargestoffet «carbon black» som ofte brukes i sort plastmateriale er en utfordring for sorteringsanleggene da de infrarøde (IR) leserne i anlegget ikke greier å lese pigmentet «carbon black» og da ei heller lese plasttypen. Når det kommer til korker så er vår konklusjon at dette er av mindre betydning, og det er to grunner for dette:

I sorteringsanleggene sitter det gitter som slipper gjennom alle deler som er mindre enn mellom 60 - 40mm (avhengig av anlegget). Korker som er tatt av flaskene vil derfor uansett ikke komme foran IR-sensorene, men bli sortert vekk grunnet størrelsen. De vil derfor ikke bli sortert som plast uansett hvilken farge de har.

Om korkene sitter på flaskene er det en fordel at de ikke leses slik at flaskene ikke sorteres i feil fraksjon. Korkene er stort sett i materialet PP-plast, mens flaskene kan være i PET. Hvis en kork i PP-plast hadde blitt lest, ville flaskene ha blitt sendt til feil plastgjenvinning.

Vi er i tett dialog med avfallsbransjen for å forstå denne delen av verdikjeden slik at vi tilrettelegger for god materialgjenvinning. Det er to viktige grunner for hvorfor vi har valgt å gå for sorte korker:

Vi vil legge til rette for at vi skal enkelt kunne innføre resirkulert materiale. Vi vet at fargen på resirkulert materiale vil variere en del fra leverandør til leverandør, og det samme gjelder kork-leverandører. Vi trenger å bruke flere leverandører, og standardiserte farger (utenom sort, hvitt og naturell) er utfordrende. Derfor vil en standard sort farge på korkene gjøre en innføring av resirkulert materiale enklest.

Det er også viktig å skille mellom pigmentet "Carbon Black" mørke farger som oppfattes som sort. Det lanseres stadig flere mørke, sorte pigmenter som ikke inneholder "carbon black" og som er lesbare med NIR-sensorer.

Labels/shrink film labels may not cover more than a maximum of 60% of the surface of the box/bottle/container. [...] An exemption to the maximum requirement of 60% applies if the label/shrink film label is made of the same plastic as the bottle. Det benyttes ofte materialet PET-G i krympefolier. Om denne legges rundt en PET-flaske så er det ikke nødvendigvis positivt for gjenvinner som gjerne vil skille disse to PET-materialtypene da det er stor forskjell på egenskapene og dette går ut over regranulatet. Det er heller ikke gitt at sorteringsanlegget sine NIR-sensorer leser PET-G som PET. Vi har erfart at leserene ikke ser dette materialet. Vi mener at det bør legges inn et krav til at det skal vises til god scanbarhet om det skal tillates bruk av etikett over 60%.

Det jobbes med å se på løsninger for å få forbruker til å fjerne folien før avhending. Vi har slike løsninger på våre sleevede produkter i dag. Vi ser lite indikasjon på at forbruker faktisk fjerner folien selv om det er gjort enkelt. Link til internasjonalt initiativ: <https://petcoreeurope.prezly.com/s/b4388339-15b3-4932-aa10-51d490ade49e>

If exemption is used, it must be documented by a test at a sorting facility that the NIR sensor reads and sorts the box/bottle/container to the correct plastic fraction despite the label. Se kommentaren over om hvordan en slik prosess må standardiseres.

Please note: The Nordic Ecolabelling will start a project on labels to see if more requirements on labels should be included in the requirements. There will be a decision made in March 2021 including a plan for implementation. Hvem er med i dette prosjektet? Er GPN og Mepex involvert? Vi inkluderes/orienteres gjerne i dette.

Test results from a sorting facility that shows that the NIR sensor reads and sorts the box/bottle/container to the correct plastic fraction despite the label, if exemption to the label size of 60% applies. Se kommentaren over om hvordan en slik prosess må standardiseres.

Reckitt Benckiser

Plastic packaging should have a design that enables material recovery. This means that:

Only white pigment can be added to the box/bottle/container.

- By introducing recycled plastic in packaging, the color of the final product is affected, hence it is crucial to be able to use colors to achieve both a sustainable packaging by introducing PCR and having a consumer relevant/recognizable. This is major part of the brand identity, which could lead to less eco-labelled products, if enforced as this would lead to commodity market.

Labels/shrink film labels may not cover more than a maximum of 60% of the surface of the box/bottle/container. The calculation of the percentage shall be based on the two-dimensional profile of the box/bottle/container. If the label on the front of pack and back of pack are of different size, the maximum percentage of 60% shall be fulfilled for each side separately. The area of the top and bottom of the box/bottle/container shall not be included in the calculation. An exemption to the maximum requirement of 60% applies if the label/shrink film label is made of the same plastic as the bottle. If exemption is used, it must be documented by a test at a sorting facility that the NIR sensor reads and sorts the box/bottle/container to the correct plastic fraction despite the label.

- It is unrealistic to have labels only covering 60% of the packaging, as already the size of the packaging is reduced to its minimum to deliver a sustainable product in-line with WUR restrictions.
- There are currently initiatives and focus from EU on making it possible to remove shrink films before recycling. Hence this should off-set the problem at recycling station, as labels will be separated and the machines at the sorting facility will register the containers correctly.
- Currently we have 1 SKU which will need to be changed to 2 or 3 to facilitate a label with only 60% of the pack-size. This will increase complexity and lead to higher risk of scrapping of packaging material. (please see attached artwork to gain a deeper understanding of the issue) The artwork covers from just below the lid to the bottom, and is just enough to cover all mandatory legal/regulatory text (see picture below).

Suomen Uusiomuovi Oy/Finlands Plastretur Ab

2) For same reason we see that the color requirement will not work. When using HH waste as origin the colour of the regranulate will be such that clear or white will not be possible. Therefore other colors but black should be allowed.

Closed loop with detergent bottles would be ideal but it will be difficult to achieve with HH packaging. Therefore there needs to be flexibility in the use of other HH waste in these bottles. HDPE is probably the most flexible in use.

You refer to the FTI manual 0,7 – please note that there is a newer version available. Suggest that you check for any differences.

Unilever Sverige AB

- *Black pigments cannot be added to the closures.*

Unilever has alternative detectable black, suitable for recycling.

- *Labels/shrink film labels may not cover more than a maximum of 60% of the surface of the box/bottle/container.*

Reducing the size of a label to be under 60% coverage may be in contradiction to legal requirements where we have requirements on consumer information easily readable on pack. On smaller packs, there is already today a challenge to fit all legally required text, thus making the label smaller could impact legal text which is not acceptable. Safety for our consumers will always be prioritized. In current criteria, Nordic Swan Ecolabel criteria there are also requirements on consumer information on pack, will this then be removed in the new criteria?

- *Packaging specifications (including bottle, labels and closures) or certificate showing the plastic used and what pigments have been added.*

What kind of info are you looking for? Color of pigment or exact trade name? In App 1 the supplier already needs to submit if any pigment other than white is used and for closures that no black pigment has been used. Do we need to give all pigments used in the label? What is the intent of this?

- *A calculation showing that the density measurement is not exceeded.*

Why is this needed when the supplier should give the density in App 1 if filler is included?

- *Test results from a sorting facility that shows that the NIR sensor reads and sorts the box/bottle/container to the correct plastic fraction despite the label, if exemption to the label size of 60% applies.*

How do you expect this to be reported? Will you accept any sorting facility to measure this or only ones that handle packaging recycling for the Nordic countries? This requirement will be extremely difficult to comply with; it will be very difficult to have finished printed sleeves to test early in the process.

Comments from Nordic Ecolabelling

Thank you for your feedback. As you see this requirement generated a lot of comments and also some opposite comments. Based on these comments and subsequent dialogue we have made several changes to the requirement, all marked with red while the removed text is crossed out. Nordic Ecolabelling looks forward to your comments on these changes.

Ministry of Environment and Food of Denmark

O3/O4. The criteria setup reflects the situation some years back, where sorting of black plastic could cause troubles to sorting facilities and recycling after that. This situation is, however, changing with new scanners enabling sorting of black plastic. Nordic Ecolabelling should therefore consider demands to plastic on only allowing white pigment and excluding black pigment and fillers.

It is at least very important to follow the situation so the Nordic Ecolabel is not a barrier to the recycling and use of recycled plastic material. The Danish Waste Association (www.danskaffaldsforening.dk) has published new proposals to sorting criteria, suggesting and concluding that black pigments will not interfere with sorting and recycling of plastic material.

Especially for packaging material to detergents, it could be a selling point that the packaging is not clear or total white, but instead *signal* the use of recycled material.

If Nordic Ecolabelling keeps the criteria, it is important to put in a requirement on revisiting the criteria on pigments after every 2 years to see if new knowledge and techniques have developed!

Finally, a comment on dosage devices (which is also relevant for this consultation on packaging design). In the current criteria there are no requirement to dosage devices, ensuring correct dosage of the liquid detergent. Many consumers use the cap to dose the liquid, and many manufacturers of the ecolabelled liquid detergent do offer some dosage devices, either separate devices (“washing balls”) or with the cap, and many design the cap with an inner rim/edge to avoid spillage of detergent to the outside of the bottle when placing the cap back again. This allows the consumer to – very exactly – to dose the detergent, however, it is important anyway that the manufacturer on label under dosage information indicate the volume of the cap, helping the consumer to use the correct dosage.

The Nordic Ecolabelling should consider making it mandatory that caps have this inner rim making it possible to use it as a dosage device.

Comments from Nordic Ecolabelling

See the general answer above.

Regarding the comment on dosage device. We proposed this in sub consultation 2 on dosage and the requirement has been further adjusted in the final consultation proposal.

O4 Design for recycling of flexible plastic pouches/bags

BlueSun

- *The plastic packaging (incl. closure, excl. label) must be made from Polyethylene (PE), Polypropylene (PP) or Polyethylene terephthalate (PET). This Requirement is viable.*
- *The pouch/bag should be made of monomaterial, i.e. not laminates with layers of different materials. This requirement is very delicate to us, as we are currently analyzing the possibility, but the suppliers who offer this type of pouches (monomaterial) is limited.*
- *Only white pigment can be added to the pouch/bag. Printing colour is allowed on the surface. This Requirement is viable.*
- *Barrier coatings can only be made from EVOH (Ethylene vinyl alcohol) in maximum amounts of 2% related to the total weight. Does not apply to us.*
- *PS and PVC or plastics based on other types of halogenated plastics must not be present in the label. This Requirement is viable.*
- *Black pigments cannot be added to the closures. This Requirement is viable.*

Comments from Nordic Ecolabelling

Thank you for the feedback. We understand that monomaterials are scarce here and now but are on the way. Since there is a one-year transition period between the two criteria generations we are not yet prepared to change this requirement.

Dansk Vask-, Kosmetik- og Husholdningsindustri

Monomateriale er fortsat et problem, men vi tror godt, det kan løses på sigt. Kvaliteten vil dog ikke blive lige så god, som den vi har i dag.

Barrier coatings can only be made from EVOH (Ethylene vinyl alcohol) in maximum amounts of 2% related to the total weight.

Må det ikke kun være et lag, eller må materialet gerne være coatet?

I skriver ikke noget om "silicone closures", betyder det, at I vil acceptere det?

Comments from Nordic Ecolabelling

Tack för feedback. We have excluded silicon closures in the final consultation proposal.

Diversey

- Mention of barrier coating: could you define barrier coating as it is for me going against the monolayer.
- Regarding the presence of the EVOH: as this applies to barrier coating (on top), this does not apply to the use of EVOH in the monolayer plastic of PE as a plastifier?

Comments from Nordic Ecolabelling

Only barrier coatings of EVOH are allowed as it is our understanding that these do not disturb the recycling process too much.

Förpacknings- och Tidningsinsamlingen, FTI

- Materialval: För flexibla förpackningar gäller att endast PE-förpackningar är materialåtervinningsbara, därför bör detta krav endast tillåta PE. Vad gäller påsar så är det mycket ovanligt (om det ens finns) att de tillverkas av monomaterial PET eller PP, så att snäva in kravet till endast PE gör inte så stor skillnad. Den stora huvuddelen av denna typen av förpackningar tillverkas idag av olika varianter av PET/PE-laminat, som inte kan materialåtervinnas. Ett alternativ skulle kunna vara att påsarna, förutom monomaterial PE, även får vara tillverkade av PP/PE-laminat. Dessa förpackningar kan förvisso inte materialåtervinnas idag men de har stor potential att kunna materialåtervinnas framöver. I takt med att PET/PE-laminat fasas ut kan PP/PE-laminat bli vanligare.
- En punkt säger att det är ok att trycka på förpackningen. Stora svarta eller mörka tryck kan innebära problem i återvinningsprocessen, därför bör dessa begränsas. Kan man säga något om begränsning av tryck, tex att endast 60% av förpackningens yta får tryckas?

Comments from Nordic Ecolabelling

Tack för input. Det är bra att veta att PP/PE-laminat kanske kan fungera som ett alternativ om monomaterialpåsar inte kommer till marknaden i tid. Vi har lagt till ert förslag om begränsning av tryckning.

McBride plc

A big concern to the company as all of our Doypacks are made with two materials - none of our suppliers have mono-material doypacks available. The currently recyclable material is a laminate of the same materials but has a print that is sandwiched between the films.

Comments from Nordic Ecolabelling

Thank you for the feedback. We understand that monomaterials do not exist here and now but are on the way. Since there is a one-year transition period between the two criteria generations we are not yet prepared to change this requirement.

Orkla Home&Personal Care

The pouch/bag should be made of monomaterial, i.e. not laminates with layers of different materials. Det er stadig flere leverandører som lanserer monomaterial laminat som kan fungere til denne produktkategorien. Så innen 2021 vil dette være naturlig å tenke at slike fleksible materialer vil være tilgjengelig for en rekke produkter.

Black pigments cannot be added to the closures. Samme kommentarer om sorte/mørke pigmenter vs "carbon black", samt kommentaren på "closures" angående behovet for å kunne lese slike komponenter. I dette tilfellet er vår vurdering at det vil være en fordel om disse ikke leses slik at NIR-sensoren kun ser foliematerialet.

Comments from Nordic Ecolabelling

Thank you for the feedback.

We have adjusted this requirement and the previous when it comes to black/carbon black.

Mayeri Industries AS

For us, we think the biggest problem will be with pouches, because our suppliers are not convinced that it is possible to use only one kind of material and it would work well. But they already started to collect information, how to do it and what will be the final possibilities.

Comments from Nordic Ecolabelling

Thank you for your input and for the information that you have started to collect information. We understand that monomaterials are scarce here and now but are on the way. Since there is a one-year transition period between the two criteria generations we are not yet prepared to change this requirement. We hope that our requirement will motivate to more development of pouches in monomaterials.

O5 Weight-Utility Ratio (WUR)

BlueSun

We can only give feedback regarding the new WUR values, once we know what the new minimum dosage requirements will be.

Comments from Nordic Ecolabelling

Nordic Ecolabelling are welcoming your input to the WUR in the final draft for consultation.

Diversey

- WUR based on the 75% recycled: as mentioned before 75% seems very high for a new compulsory criteria.
- WUR adjusted for the bag in a box: to mix the 2 WUR calculation but the part of the plastic is a pouch (not hard plastic) and is not recycled at all so should the WUR for the plastic in this case be higher?

Comments from Nordic Ecolabelling

Nordic Ecolabelling appreciates your comments. If the proposed minimum percentage of recycled material is adjusted, the WUR limits will be adjusted accordingly in the final criteria. From an environmental point of view, use of a plastic pouch can be supported versus a hard plastic packaging if there is significant savings of material that outweighs the disadvantage of not including recycled material. Hence, the WUR for the plastic pouch should not be higher, even if recycled material is not required.

Kosmetik- och hygienföretagen

De värden som presenteras för WUR är en extrem sänkning jämfört med i nuvarande kriterier. Vi ifrågasätter om detta är möjligt att uppfylla. Nuvarande WUR-värde för en plastförpackning för flytande tvättmedel är 1,5 g/kg wash. Det ska ställas i relation till det föreslagna värdet på 0,9 g/kg wash för flytande tvättmedel, och det ännu lägre värdet 0,6 g/kg wash för fläckborttagning. Vi bedömer att denna

sänkning inte är realistisk att uppfylla eftersom 75 % återvunnet material i förpackningen är rimligt på kort sikt. En sådan stor förändring inom förpackningsindustrin kan inte förväntas. Det är inte heller möjligt att koncentrera produkterna mer utan att det ger konsekvenser inom lagstiftningen för klassificering och märkning, CLP. Produkterna måste klara av att transporteras och hanteras utan att de går sönder och innebär en risk för konsumenter.

Comments from Nordic Ecolabelling

Nordisk Miljømerking takker for deres innspill. I følge data som vi har for dagens Svanemerkede produkter, vil de aller fleste av disse produktene klare de foreslåtte WUR-grensene dersom mengden resirkulert forpakkingsmateriale økes fra det nivået som produktene har i dag, til det foreslåtte minimumsnivået på 75%. Det gjelder både for flytende vaskemidler og for flekkfjernere. Det vil i forhold til WUR-grensen altså ikke være behov for oppkonsentrering av produktene eller reduksjon av emballasjemengden. Dersom man i de endelige kriteriene ender opp med en annen prosentsats for resirkulert materiale, vil WUR-verdien bli justert tilsvarende. Angående konsentrering av produktene henviser vi til deres høringsinnspill og vårt svar i sub-consultation 2 krav O1 (maximum dosage).

Mayeri Industries AS

And also about the WUR, if reducing the final weights of the packaging, we mean the bottles, boxes etc. The plastic/cardboard will be so thin and soft, that we need to put the bottles/boxes/etc. to extra packaging, because otherwise these will collapse during transportation. And therefore we will put more packaging, than to keep the initial packaging a bit heavier and thicker. It has already been problem with current criteria. Although yes, the use of recycled material will help bit more to get positive results in WUR, but still, we think that this is quit tough requirement.

Comments from Nordic Ecolabelling

The WUR has been adjusted taking into account the required percentage of recirculated material as well as by taking into account the WUR-levels of the currently licensed products. The WUR limits have been adjusted according to the changed limit of recycled materials.

McBride plc

WUR calculation more strict as it refers to minimum 75% of PCR and due to company policy we will be at 50% - moving to 75% PCR bottles for Nordic Swan only will add complexity to the business.

Comments from Nordic Ecolabelling

Nordic Ecolabelling appreciates your input. The WUR limit will be adjusted in accordance with the percentage of recycled material that we end up with in the final requirements.

Reckitt Benckiser

Stain removers in plastic-based packaging: 0,6 g/kg wash*

- WUR limit is reduced by 50% for powders and 60% for Liquids. The new proposed criteria do not take into consideration the form of the product as powders and liquids have one criteria.

- TO achieve this, it will require products to be more concentrated -> this is not possible as hydrogenperoxide regulated by Regulation 98/2013 on explosives precursors limiting it to 12%.
- Taking into consideration that 75 % is not a realistic target, the WUR is disproportional to reality. To achieve this target, products will need to be highly concentrated leading to a more Hazardous product. This will require additional CLP text, hence a larger label, while also increasing consumer safety risks.
- Reco to reduce to Powder to 0,9g/kg wash and liquids to 1,0g/kg wash

Comments from Nordic Ecolabelling

The WUR has been adjusted taking into account the required percentage of recirculated material as well as by taking into account the WUR-levels of the currently licensed products. The WUR limits have been adjusted according to the changed limit of recycled materials.

Suomen Uusiomuovi Oy/Finlands Plastretur Ab

The WUR definition is interesting – we will follow how this use will progress.

Comments from Nordic Ecolabelling

Nordic Ecolabelling appreciates your support.

Unilever Sverige AB

This [the proposed WUR limits, ed. note.] will not be possible to comply with. As trend is to a broader range of bottles with both big and small sizes this will be very difficult especially for smaller sizes.

The weight of packaging is already optimised to use the least amount of material possible and our current smaller packs only comply with current criteria due to high PCR content (97% in bottle). None of our current bottles will pass this criteria. We cannot make the current packaging lighter, especially if we are adding PCR into the packs. The weight of the pack defines the thickness of the packaging, if we are to reduce this further the bottles will not support the contents, and will collapse during distribution, the Top-Load of packaging will be reduced, pallet will collapse. Formulation would be more exposed to the environment. If the wall thickness was reduced this would affect consumer use, especially when pouring, the strength of the packaging would be lost. The ability to seal the contents would also be affected. In addition to this we always need to have a bit of headspace in the bottles, otherwise it would not work in the filling line.

As we do not think it is possible to tighten the WUR as suggested we instead suggest to have a minimum fill requirement as larger pack today get away with underfilling and WUR it much tougher for smaller bottles.

Comments from Nordic Ecolabelling

Nordic Ecolabelling appreciates your input. We have reviewed the data for the current Nordic Swan Ecolabelled products. According to our data, most of the currently Nordic Swan Ecolabelled products will pass the proposed limits when increasing the content of recycled packaging material in accordance with the new requirement for recycled material. Hence, we find the proposed limits reasonable. The WUR limits have been adjusted according to the changed limit of recycled materials.

4.2 Sub consultation 2: General comments

Svenskt Vatten

Vi tycker kriteriedokumentet ser bra ut så här långt. Vi har en fråga, hur ställer ni er till klassificeringen av LAS (och andra ämnen) som inte har harmoniserade klassificeringar? Är det tvättmedelstillverkaren eller deras leverantör av utgångsämnen som beslutar hur klassificeringen ska vara?

Comments from Nordic Ecolabelling

Nordisk Miljømerking takker for deres positive tilbakemelding. Den som bringer stoffet på markedet (i EU/EØS) er ansvarlig for klassifiseringen, i henhold til CLP (altså «produsent/leverandør» av stoffet). Dersom klassifiseringen til et stoff avviker fra egenklassifiseringene som er oppgitt i ECHAs Classification and Labelling Inventory, skal det brukes «worst case» fra C&L Inventory, med mindre «produsenten/leverandøren» kan begrunne avviket i klassifiseringen. Merk at LAS per i dag er forbudt i Svanemerkede tøyvaskemidler fordi vi krever at alle tensider skal være anaerobt nedbrytbare. Det er foreslått som krav også i de reviderte kriteriene (se O4). LAS er klassifisert som ikke anaerobt nedbrytbar på DID-listen. DID-listen er bindende ved søknad om Svanemerket.

Novozymes A/S

We welcome Nordic Ecolabelling initiatives for safer, greener laundry detergents and we thank you for taking the time to read through to our opinions and recommendations for the criteria for Laundry detergents and stain removers. We find this topic highly relevant and see the eco label as a key tool to solve the common goal of making laundry detergents as green and sustainable as possible.

Enzymes remove stains/soils at low temperature, are readily biodegradable and we have proven that impact to the environment is negligible. It is our belief that through the use of enzymes the goals on safer, greener laundry detergents can be achieved.

Comments from Nordic Ecolabelling

Thank you for your supportive comment.

Mayeri Industries AS

Overall, the revision document for correct dosing, ecotoxicity and efficiency seems reasonable and the changes are not too firm and could be followed.

Comments from Nordic Ecolabelling

Thank you for your supportive comment.

Upphandlingsmyndigheten

Upphandlingsmyndigheten yttrar sig utifrån uppdraget att utveckla och stödja den upphandling som genomförs av upphandlande myndigheter och enheter samt att stödja de leverantörer som deltar i sådan upphandling.

Upphandlingsmyndigheten stödjer det reviderade förslaget av kriterier för textiltvättmedel och fläckborttagningsmedel och lämnar kommentarer under respektive krav nedan.

Det är möjligt att hänvisa till en viss märkning enligt LOU, lag (2016:1045) om offentlig upphandling (se 9 kap. 12-15 §§). Följande förutsättningar ska då vara uppfyllda:

1. kraven för märkningen endast rör kriterier som har anknytning till det som ska anskaffas,
2. kraven för märkningen är lämpliga för att definiera egenskaperna hos den vara, tjänst eller byggtreprenad som ska anskaffas,
3. kraven för märkningen grundas på objektiva kontrollerbara och icke-diskriminerande kriterier,
4. märkningen har antagits genom ett öppet och transparent förfarande i vilket samtliga berörda kan delta,
5. märkningen är tillgänglig för alla berörda, och
6. kraven för märkningen fastställs av ett organ som den som ansöker om märkningen inte har ett avgörande inflytande över.

Nordisk miljömärkning kan gå igenom miljömärkningskriterierna som ingår i den aktuella märkningen för att säkerställa att de uppfyller förutsättningarna. Det kan

underlätta för upphandlande myndigheter, såsom kommuner eller regioner, att använda märkning vid upphandling.

Comments from Nordic Ecolabelling

Nordisk Miljømerking takker for støtten.

Senzora bv

Having read the draft for consultation for the second sub process, we would like to let you know that we agree with the proposed requirements.

We think that they are reasonable and well-balanced.

Comments from Nordic Ecolabelling

Thank you for your supportive comment.

Kosmetik- och hygienföretagen

Kosmetik- och hygienföretagen vill lämna följande synpunkter:

Vi stödjer inte förslaget till kriterier.

Vi anser att det är för kort om tid med endast 14 dagars remisstid. Vi anser att remissinstanserna ska få åtminstone 1 månad på sig att gå igenom förslaget för att kunna ge välgrundade synpunkter för att bedöma eventuella konsekvenser. Det är

positivt att man har försökt dela upp remissarbetet över tid, samtidigt som det gör det svårare att överblicka den totala konsekvensen av förslagen till ändringar i kriterierna.

Comments from Nordic Ecolabelling

Nordisk Miljømerking takker for deres innspill. Vi gjør samtidig oppmerksom på at i tillegg til 14 dagers høringsperiode for alle delhøringene, vil det være 4 ukers høringsperiode på det endelige kriterieforslaget.

Vi ska utvärdera processen efter att vi är färdiga med projektet och tar hänsyn till er kommentar i beslutet om fortsatt arbetssätt i revisioner

4.3 Sub consultation 2: Correct dosing, ecotoxicity and biodegradability

Upphandlingsmyndigheten

Upphandlingsmyndigheten föreslår att förkortningar såsom CDV, aNBO och anNBO skrivs ut för att förenkla för läsaren.

Comments from Nordic Ecolabelling

Nordisk Miljømerking takker for innspillet. Vi vil skrive fulle begreper i det endelige kriteriedokumentet.

O1 Maximum dosage

Svenskt Vatten

Dosering: Doseringen är betydligt mindre än i nuvarande kriterier vilket är bra. Från 14 g/kg tvätt till 10. Men mängden miljöfarliga ämnen får fortfarande vara densamma per kg tvätt. Det betyder att den får öka mätt som procent av själva tvättmedlet.. Se O2, Long term environmental effects, sid 7 i kriteriedokumentet.

Comments from Nordic Ecolabelling

Nordisk Miljømerking takker for innspillet. Ut fra miljødata på dagens Svanemerkede produkter finner vi ikke grunnlag for en vesentlig innstramming av kravet til miljøfarlige stoffer. Kravet er som dere påpeker det samme som før. Merk dog at CDV (krav O3) er skjerpet inn. CDV er nært relatert til miljøfarlige stoffer, fordi økotoksitetsverdier og nedbrytbarhet inngår i beregningen av CDV. Totalt sett er det altså en viss innstramming.

Nopa Nordic

Vi kan godt forstå at vi skal køre så koncentrerede produkter rundt som muligt. Men hos Nopa rammer det vores Premium segment, dvs. de produkter som performer bedst. Så ved at sænke doseringen er der en risiko for at produkterne på markedet bliver dårligere, da der ikke samtidig stilles strengere krav til performance og produktet bliver dyrere pr. enhed for vores kunder. Vi har mange produkter der har en dosering over 10 g/kg, og vi tror ikke at vi kan nå at få nye mere kompakte

formuleringer, med samme performance til 2020. Vi vil derfor gerne anbefale at der ikke reducerer så voldsomt ved doseringen, så længe i ikke rører ved funktionstesten.

Comments from Nordic Ecolabelling

Nordisk Miljømerking takker for innspillet. Funksjonstestkravet skal sikre at produktene har tilfredsstillende effektivitet. Ut fra tilgjengelige data mener vi at det er mulig å oppnå tilfredsstillende effektivitet for produktene også med en noe redusert dosering i forhold til dagens verdi.

Gränsen är dock höjt till 11 g/kg tvätt till den slutliga remissen.

Mayeri Industries AS

About the dosing, you want to reduce the dosing of high-duty detergents to 10 g/kg. The recommended dosage for middle hard water must not exceed 130% of the recommended dosage for soft water. The recommended dosage for hard water must not exceed 160% of the recommended dosage for soft water. But taking into account that EU Ecolabel just renewed their criteria and their maximum dosage for medium hard water for high-duty detergents was reduced to 16 g /kg. If one product has both ecolabels, then when Nordic Swan requires the middle hard water not to exceed 130% of the recommended dosage for soft water, then you should take account also the EU Ecolabel dosing, because many producers have renewed their license for EU Ecolabel and the middle hard water dosing 16g/kg has been used, so if you will reduce the dosing in soft water to 10g/kg, then the difference between Nordic Swan (soft water) and EU ecolabel (middle hard water (Performance tests at 2,5 mmol CaCO₃/l = 14 dH)) dosing is 160%. Although it has been said that this has been taken into consideration, it seems to me, that there is still a cap.

Comments from Nordic Ecolabelling

Nordic Ecolabelling appreciates your input. While 2,5 mmol CaCO₃/l (14 dH) is indeed defined as medium hardness in the detergent regulation (Regulation (EC) 648/2004), please note that 14 dH is considered as hard water in all Nordic countries except Denmark, where 14 dH is considered between medium and hard, as “quite hard” (ref Geological Survey of Denmark and Greenland¹). Please also note that 14 dH is set as the limit between medium and hard water in the EU Ecolabel criteria (ref eg. the EU Ecolabel criteria document for institutional and institutional laundry detergents, Commission Decision (EU) 2017/1219). Hence, Nordic Ecolabelling finds it reasonable to impose a maximum dosage of 10 g/kg, which corresponds to 16 g/kg at hard water. We are, however, suggesting a limit 11 g/kg wash in the final consultation.

BlueSun

Heavy-duty laundry detergent: Change from 14 to 10. The requirement is viable for liquids. It will be difficult to reach for Powders.

Light-duty laundry detergent: Change from 14 to 10. The requirement is viable.

1

https://data.geus.dk/geusmap/?mapname=drikkevand&lang=en#baslay=baseMapDa&optlay=&ext=136722.2222222225,5976367.1875,1192277.7777777777,6473632.8125&layers=drikkevandets_haardhed (Accessed 2019-03-25).

Comments from Nordic Ecolabelling

Nordic Ecolabelling appreciates your comments. We changed the limit to 11 g/kg wash in the final consultation draft.

Upphandlingsmyndigheten

Det är positivt med skärpta gränsvärden på doserna. Lägre dos per tvätt innebär ju även miljöfordelar såsom att tvättmedlet räcker längre och i sin tur innebär mindre transporter osv.

En definition av vad som avses med medelhårt och hårt vatten i tyska hårdhetsgrader saknas i kravet och/eller bakgrundstexten. Det framgår tydligt att 5,5 °dH är det som ska användas för att uppfylla gränsvärden i tabell 1 för tvättmedel, men intervaller för medel och hårt vatten saknas.

Comments from Nordic Ecolabelling

Nordisk Miljømerking takker for deres innspill. Definisjon av middels og hardt vann varierer noe mellom de nordiske landene. Detergentforordningen (Regulation (EC) 648/2004) definerer ikke grenser for bløtt, medium og hardt vann (foruten at 2,5 mmol CaCO₃/l faller under medium vann). EU Ecolabel definerer derimot grenseintervaller (jfr. f.eks EU Ecolabel criteria document for institutional and institutional laundry detergents, Commission Decision (EU) 2017/1219). Nordisk Miljømerking vil fortsatt la det være opp til produsentene å avgjøre grensene for vannhardhet ut fra hva som er relevant i områdene der produktet skal selges

Kosmetik- och hygienföretagen

Den maximala dosen har skärpts avsevärt. Det är viktigt att den koncentration av produkten som kriterierna efterfråga är kompatibel med kraven på klassificering av produkten. Ju mer koncentrerad produkt ju skarpare klassificering får produkten.

Comments from Nordic Ecolabelling

Nordisk Miljømerking takker for deres innspill. Det vil bli mulighet å kommentere på hele kriterieforslaget (herunder klassifiseringskrav og maksimal dose) på siste høring i august/september 2019.

Orkla Home&Personal Care

OHPC støtter kravet om reduksjon av maksimum dose, og ser fordelene av reduksjon av både emballasje og transport. Ved å redusere maksimum dose fra 14 g/kg vask til 10 g/kg vask, vil allikevel dette påvirke enkelte av våre nåværende produkter. OHPC stiller seg positive til denne endringen.

En kommentar vil være at det vil bli vanskeligere å oppkonsentrere produktene ytterligere.

Comments from Nordic Ecolabelling

Nordisk Miljømerking takker for deres støtte.

O2 Long-term environmental effects

Kosmetik- och hygienföretagen

Det är positivt att undantagen för tensider som klassas H412 och proteas behålls. Dessa undantag är nödvändiga för att tvättmedlen ska uppfylla önskad funktion.

Comments from Nordic Ecolabelling

Nordisk Miljömerking takker for deres støtte.

McBride plc

There is nothing mentioned about other banned substances than O2, the long-term environmental effect. Will there not be a similar restrictions of CMR, sensitizing etc. as in the current criteria? Also in appendix 2 and 3 only H410, H411 and H412 classifications are mentioned.

Comments from Nordic Ecolabelling

Nordic Ecolabelling appreciates your input. There will be other banned substances and classifications. The entire criteria proposal will be public and open for comments in August/September 2019.

Nopa Nordic

CLP ved kompakterede

Vi vil gerne igen opfordre til at Svanen finder en løsning på at stærkt kompakterede produkter er meget svære at formulere uden at Fareklassificeringen rammer Miljøfare H412. Ved at kompaktere undgår vi transport af ekstra vand, og selve udledningen i forhold til miljøfare er jo stadig reguleret af CDV-beregningen. Der bør kunne findes en løsning hvor produkterne gerne må mærkes H412 evt i forhold til en meget lav dosering, der er mulig som følge af kompakteringen.

Dette problem kan også blive ekstra mærkbart hvis der bliver gennemført EU-lov om at vi ikke kan bruge Cut-off-værdier på 1% i CLP beregningerne fremover.

Comments from Nordic Ecolabelling

Nordisk Miljömerking takker for deres innspill. Vi forstår deres synspunkt, men anser allikevel at en H412-klassifisering på produktnivå ikke er forenelig med Svanemerket.

Novozymes A/S

We would like to acknowledge the continued exemption for Protease/Subtilisin in requirement O2. It is important for us to state that there is no long term environmental effect from Subtilisin used in laundry detergents. We provided information to that fact to EU ecolabelling for their amendment on Subtilisin a few years back, and in case there is further need from Nordic ecolabelling on this topic, *please reach out to us and we will be happy to provide useful information.*

Comments from Nordic Ecolabelling

Nordic Ecolabelling thanks you for your support.

Orkla Home&Personal Care

OHPC støtter dette kravet.

Comments from Nordic Ecolabelling

Nordisk Miljømerking takker for deres støtte.

Appendix 3 Declaration from the manufacturer of the raw material/ingredient

Novozymes A/S

We welcome that the definition section is very clear on what is considered ingoing substances and what is considered impurities (ref. comment above on O5 text). We also appreciate that there is a lower limit for when impurities are relevant for the evaluation. This makes the criteria manageable in practice.

We may have additional comments for the Appendix 3 declaration later, when complete.

For the present hearing: We do not understand the reference to the ECHA database in the question.

Part 1 – General requirements (applies to all raw materials)	
Does the raw material/ingredient contain substances classified as environmentally hazardous with H410, H411 and H412, incl. self-classification in the ECHA database?	Yes <input type="checkbox"/> No <input type="checkbox"/>
If yes, state the amount (% by weight) per classification:	

The reference to the ECHA database can give the impression that if just *any* of the myriad of classifications found in ECHA's classification and labelling inventory database, contains the listed classifications, then it will be evaluated as having that classification by Nordic ecolabelling.

If that is indeed the intention, **we object** to that practice of evaluation on general principle, as there are many, many wrong classifications reported to that database and such wrong entries appear to just remain in the database indefinitely. And even where a classification is correct for one variant of the substance, it may not apply to all variants available on the market of that substance, as difference in classification *can* be due to difference in content of impurities.

It should always be the actual classification as used by the actual raw material supplier, that the evaluation should be based on, so we propose that the ECHA reference simply be removed. The question is fully sufficient without it.

Proposed text:

Does the raw material/ingredient contain substances classified as environmentally hazardous with H410, H411 and H412, incl. self-classification?

Comments from Nordic Ecolabelling

Nordic Ecolabelling thanks you for your input. We are aware that the C&L Inventory contains data of varying quality, and that underlying reasons such as impurities may affect the classification. In order to get a comprehensive overview of the raw material composition, we still want the raw material manufacturer to check the C&L Inventory and list any ingoing substances for which any prohibited classifications are reported in the C&L Inventory. Upon listing these substances, if the raw material

manufacturer can justify why their ingoing substance should not be classified, Nordic Ecolabelling will accept the specific ingoing substance.

The Danish Association of Cosmetics and Detergents

In appendix 2 and 3 under general requirements:

Regarding appendix 2 and 3 'general requirements' where companies shall inform if the raw material/ingredient contain substances classified as environmentally hazardous with H410, H411 and H412 incl. self-classification in the ECHA database.

The self-classification is not legally binding and shall undergo assessment in ECHA before the classification is legally binding cf. ECHA:

'A substance must be self-classified when it has no harmonised classification in Annex VI to CLP and it presents hazardous properties. For a substance that already has a harmonised classification (an entry in Annex VI to CLP), the harmonised hazard classification is legally binding for the hazard classes and differentiations covered in the entry. The hazard classes and differentiations not covered in the entry must be evaluated and self-classified, as appropriate',

<https://echa.europa.eu/regulations/clp/classification>

We encourage that the general requirements follow the classification procedures of ECHA because a self-classified substances is not legally binding and the final classification of a substances may change due to the classification process in ECHA.

Comments from Nordic Ecolabelling

Thank you for your comments. See the reply above.

Mayeri Industries AS

The declarations for raw material producers. Appendix3. Maybe it is possible to make one declaration form, that would be suitable for several criteria, as I know that many of the raw materials are used in different products and it would make it easier for the producers of the final products and also manufacturers of the raw materials.

Comments from Nordic Ecolabelling

Nordic Ecolabelling thanks you for your input. We will look into that possibility in an ongoing internal IT project. However, the project is not directly linked to this particular criteria revision.

Upphandlingsmyndigheten

Formeln för beräkning är svår att läsa. Kan den förtydligas enligt följande:

$$FV=100 \cdot C_{H410} + 10 \cdot C_{H411} + C_{H412} \leq 0,18 \text{ grams/kg wash}$$

Comments from Nordic Ecolabelling

Nordisk Miljømerking takker for deres innspill. Vi vil skrive formelen tydeligere, slik dere foreslår, når vi oppdaterer dokumentet.

O3 Critical dilution volume (CDV)

Nopa Nordic

Finvask lav CDVchronic 15000

Vi mener denne bør være samme som for almindeligt vaskemiddel. Vi har i dag store problemer med at lave en god finvask, med en god effektivitet. Vi forstår ikke at CDV kravet for denne produktgruppe er så lavt, da det typisk er et produkt som bruges sjældent, i forhold til heavy duty.

Comments from Nordic Ecolabelling

Nordisk Miljømerking takker for deres innspill. CDV-verdien er ikke koblet til bruksfrekvens. Nordisk Miljømerking stiller miljøkrav for å utpeke de miljømessig beste produktene innenfor en bestemt kategori. Finvaskemidler regnes i denne sammenheng som en egen kategori, som er adskilt fra normale vaskemidler, i og med at produktene brukes på ulike typer tekstiler. Den foreslåtte CDV grenseverdien for finvaskemidler er den samme som for dagens kriterier. Med mer data kan vi tänka oss att justera gränsvärden.

Novozymes A/S

As stated above there is no long-term effect from Subtilisin, but we acknowledge that the Critical Dilution Volume has a different focus, and that enzymes are to be evaluated like other ingredients for the purpose of CDV.

We do ask that Nordic ecolabelling monitors closely if the current DID-list data for Proteases (ID 2546) start to become a limiting factor for modern enzyme-rich detergents, as the data used by DID is old and too “harsh” compared to the latest high-quality data, as used for the purpose of REACH registration since 2015.

The DID-listed NOEC/EC10 value of 0.006 has since been replaced with newer higher quality data and the current NOEC/EC10 value used in the REACH registration dossier is **0.017** mg Active Enzyme Protein per liter. The most current and highest quality data thus give close to three times as low impact on CDV calculation from protease as the current DID-listing.

We were unfortunately not aware that the DID-list was under review in 2016 until the review was already complete, but we urge you to keep this in mind when next the DID list is updated. If possible, we ask that submissions (current or future) for protease-rich detergents can be evaluated with this in mind until the DID-list can be amended, though we understand if it is difficult to “overwrite” the current DID-list data in your individual criteria documents.

Comments from Nordic Ecolabelling

Nordic Ecolabelling thanks you for your input. We will evaluate this next time when the DID-list is reviewed.

BlueSun

Change from 45000 to 315000, according to the new CDV calculation sheet, this requirement is viable.

Comments from Nordic Ecolabelling

Nordic Ecolabelling thanks you for your input.

Orkla Home&Personal Care

OHPC støtter dette kravet om å sette ned CDV_{chronic}-verdien gjeldende vaskemidler (til normalt skittent tøy).

Comments from Nordic Ecolabelling

Nordic Ecolabelling thanks you for your support.

04 aNBO and anNBO

Svenskt Vatten

Nedbrytbarhet – se : Mængd ej aerobt nedbrytbara ämnen som får ingå har skärpts ordentligt. Och för lättsmutsad tvätt och vissa fläckborttagare är även mängden anaerobt ej nedbrytbara ämnen skärpt. Men LAS, som ju är ej anaerobt nedbrytbart, borde falla för max mængd miljöfarliga ämnen (se O2) eftersom det (oftast) är klassat H 412, så detta kriterium borde inte påverka LAS-mängden. Men det finns ingen harmoniserad klassificering av LAS vad vi kan förstå och är det någon leverantör som inte klassar det 412 så faller LAS för det anaeroba nedbrytbarhetskriteriet i stället. Därför bra att det är skärpt för åtminstone lätt smutsad tvätt. Se O4, sid 10.

Comments from Nordic Ecolabelling

Nordisk Miljømerking takker for deres tilbakemelding. Den som bringer stoffet på markedet (i EU/EØS) er ansvarlig for klassifiseringen, i henhold til CLP (altså «produsent/leverandør» av stoffet). Dersom klassifiseringen til et stoff avviker fra egenklassifiseringene som er oppgitt i ECHAs Classification and Labelling Inventory, skal det brukes «worst case» fra C&L Inventory, med mindre «produsenten/leverandøren» kan begrunne avviket i klassifiseringen. Merk at LAS per i dag uansett er totalt forbudt i Svanemerkede tøyvaskemidler fordi vi krever at alle tensider skal være anaerobt nedbrytbare. (For tensider er det altså null-toleranse, og grenseverdiene i tabell 3 i O4 gjelder ikke).

BlueSun

These changes are viable.

Comments from Nordic Ecolabelling

Nordic Ecolabelling thanks you for your support.

Orkla Home&Personal Care

OHPC støtter kravet om endring i grenseverdiene for aerob - og anaerob nedbrytbarhet.

Comments from Nordic Ecolabelling

Nordic Ecolabelling thanks you for your support.

Upphandlingsmyndigheten

Förtydliga gärna kravrubriken med att aNBO avser aerob nedbrytbarhet och att aNBO avser anaerob nedbrytbarhet.

Bakgrundstexten till detta krav kan förslagsvis göras tydligare för läsaren genom att ange vilka värden som har skärpts, det vill säga vilka kategorier som nu fått skärpta värden.

Comments from Nordic Ecolabelling

Nordisk Miljømerking takker for deres innspill. Vi vil skrive betegnelsene fullt ut i det endelige kriteriedokumentet. Bakgrunnsteksten er forsøkt balansert ved at vi ønsker å oppgi tilstrekkelig informasjon til å begrunne kravene, samtidig som teksten skal være kortfattet.

O5 Phosphorous

Novozymes A/S

A note on terminology. The O5 section writes “*This requirement includes the total amounts of all substances containing phosphorous, calculated as P*”. It is not clear whether substances here are “ingoining substances” as defined by the criteria, though we expect this is the intent. In order to avoid confusion though, we ask that the term “ingoining substances” is used consistently throughout the criteria in place of just the word “substances” alone. Likewise, we propose that it is clearly and unambiguously stated *if* any part of the criteria is *also* intended to cover those impurities that are not considered as ingoining substances (impurities <0.01% in detergent and <1% in the raw material).

Comments from Nordic Ecolabelling

Nordic Ecolabelling thanks you for your comments. The intent is indeed “ingoining substances”. We will go through the final document in order to avoid any confusion.

Upphandlingsmyndigheten

Positivt med skärpta gränsvärden för fosfor.

I rengöringsmedel och handdiskmedel ser fosfor kravet annorlunda ut. För upphandling vore det önskvärt om kravet skrevs på samma sätt här som i rengöring och handdisk, men det finns förmodligen behov av små mängder fosfor i textiltvättmedlen.

Comments from Nordic Ecolabelling

Nordisk Miljømerking takker for deres kommentar. I tekstilvaskemidler kan det være gunstig med små mengder fosfonat.

Kosmetik- och hygienföretagen

Det är positivt att tillåten mängd fosfor bibehålls. Vi ser inte något behov av att skärpa tillåten mängd fosfor i produkterna.

Orkla Home&Personal Care

OHPC støtter kravet om å opprettholde eksisterende grenseverdier for fosforinnhold.

Comments from Nordic Ecolabelling

Nordisk Miljømerking takker for deres støtte.

4.4 Sub consultation 2: Consumer guidance

06 Dosage instructions

McBride plc

There is no mandatory consumer guidance, as in R17 in current criteria. Does this mean that this will not be part of the new criteria?

Comments from Nordic Ecolabelling

Nordic Ecolabelling thanks you for your input. There is mandatory consumer guidance also in the revised criteria. See discussions about this for the proposed criterion O1 in the first sub consultation as well as criterion O14, O15, O16 in the final draft for consultation.

Nopa Nordic

I forhold til krav til lukkeanordning der skal fungere som doseringsanordning samt krav til at kapslen har et maksimumvolumen på den dosering der anbefales til blød vand, er vi følgende udfordringer:

- Hvis kapsler skal tilrettes til dosering ved blødt vand, vil Nopa få en omkostning på kapslerne i omegnen af 2 mio kr. og en sådan ændring vil kræve mindst 1,5 år til implementering. Omkostningen er vel at mærke pr. kapsel, der skal ændres.
- Vi kan ikke til produktserier i samme flaske have forskellige kapsler, det ødelægger det visuelle indtryk, ny kapsel med ny højde betyder også at vi får brug for flere typer sekundæremballage, så forsendelsen bliver stabil på pallen.
- Hvis man skal undgå dette, vil man muligvis rette doseringen op, så den er ens på alle produkter, dette er ikke godt for miljøet, da der så vil ske en overdosering.
- Der findes produkter i kategorien uden doseringskapsel – ex. ny Änglamark. Forbrugerne havde efterspurgt en squeeze funktion i kapslen, så man ikke kom til at hælde for meget ud. Doseringen sker altså via doseringsmærkerne på flasken
- Vi risikerer, at kunden dropper Svanemærket, fordi det bliver for besværligt, stigende priser, visuelt indtryk forstyrres, vi må bede kunderne overdosere osv.
- Vi kan anbefale, at der i stedet bliver anført en dosering på etiketten i stedet ex. 55 ml tilføjes: en halv kapsel, 75 ml doseres ¾ kapsel osv. På Änglamark er der allerede på etiketten anført hvordan skala-inddelingen på flasken bruges.
- Dosering bør ikke ses isoleret som kapslen, men som hele produktet med de skalaer og anvisninger der kan være på flasken.

Comments from Nordic Ecolabelling

Nordisk Miljømerking takker for deres innsbill. Vi er i stor grad enige i deres synspunkter. Vi vil omformulere krav O6b og slette krav O6c.

Coop Norge Handel AS, Coop Danmark A/S, Coop Trading A/S

I forbindelse med udsendt høring for nye kriterier til tekstil-vaskemidler (sub-process 2) vil vi gerne komme med følgende kommentarer;

Vi ser en bekymring i nye krav til doseringsangivelse i kapsel for flydende vask.

COOP har netop lanceret ny innovativ emballage-løsning med flaske i r-PET hvor flasken har en indbygget måleskala kombineret med en squeeze-kapsel, således at forbrugeren direkte kan afmåle dosering og undgå overdosering. Flasken har volumen-markører på to sider således at brugeren uhindret kan se denne. Samtidig har etiketten en specifik henvisning til at undgå overdosering og reference til volumen mellem markørerne.

Der er foretaget betydelige investeringer i denne løsning og COOP kan ikke tilslutte sig nuværende forslag med fastlagt krav om kapsel med målemarkør. Vi mener der bør være mulighed for alternative løsninger til at sikre, at korrekt dosering nemt kan foretages af forbrugeren.

Comments from Nordic Ecolabelling

Nordisk Miljømerking takker for deres innspill. Vi vil omformulere krav O6b for å ta hensyn til andre produktformater enn tradisjonell flaske med kork.

BlueSun

O6b) These requirement is viable.

O6c) We agree that overdosing is a problem, but other countries base there recommended dosage on medium hard water. It will not be viable to have a cap just big enough for the recommended dosage of soft water.

Comments from Nordic Ecolabelling

Nordic Ecolabelling appreciates your input. We thank you for your support om O6b. Regarding O6 c we admit that it may not be feasible nor desirable to limit the cap size to one normally soiled wash load at soft water. We will delete this requirement.

Diversey

For the dosing cap in O6 dosing instructions, we are investigating if this would be feasible to make graduation on it to allow a better dosage control on our current products so we will most likely provide a better feedback during the last review on the full criteria proposal.

Comments from Nordic Ecolabelling

Nordic Ecolabelling appreciates that you will investigate this.

Orkla Home&Personal Care

For å begrense overdosering, og tilhørende negative effekter på miljøet, er foreslått krav fra Svanen at lukkeenheter til flytende produkter skal fungere som en doseringsenhet og at det skal følge et bilde på etiketten. I tillegg, for å sikre en korrekt dosering, skal korkstørrelsen være begrenset til anbefalt dose.

OHPC mener dette er akseptable krav dersom primæremballasje er en flaske, men det begrenser emballasjen til produktet til å være en flaske for at kravene skal innfris.

For enkelte av våre produkter er primæremballasjen en foliepose, noe som gir en betydelig reduksjon av plast i emballasjen. Til en slik enhet er det vanskelig å utføre korken som en doseringsenhet. Dette er løst ved at doseringen er opplyst på etikett og at en doseringsball finnes i butikk eller kan bestilles (lett tilgjengelig informasjon på etiketten). Samme problemstilling gjelder ved for eksempel bruk av kartonger som primæremballasje. Et bilde og tydeliggjøring av anbefalt dose på etiketten vil la seg løse. I disse tilfellene har vi vurdert at en tydelig og enkel informasjon til kunden om dosering er meget viktig.



Angående korkstørrelsen har OHPC en liten kommentar. Hva menes med at korkstørrelsen er begrenset til anbefalt dose? For liten kork kan være med å gi økende spill og søl av det flytende vaskemiddelet ved dosering, og derfor uheldig. Vi ber svanen om å vurdere formuleringen på dette kravet.

Kravene, slik de står nå, kan føre til at svanemerkede produkter i plastbesparende folieposeformat må over på en mer plastintensiv emballaseløsning som flaske og doseringskapsel. Hvordan vi vektet miljøpåvirkningen av mindre mengde plastlaminat folie vs. en større mengde mer materialgjenvinnbar plast kan og blir diskutert, men all den tid vi aktivt jobber med å ta fram funksjonell materialgjenvinnbar folieemballasje av monomateriale så ønsker vi selvsagt at dette, som bærekraftig emballasjealternativ, ikke skal havne utenfor kriteriene til Svanen.

Vi tilgjengeliggjør gjerne informasjon og hjelpemidler for korrekt dosering, og en ytterligere tydeliggjøring av dette kan være på sin plass, men fra interne undersøkelser så har vi fått tilbakemelding om at doseringskapselen som i dag følger med hvert eneste tøyvaskemiddel i flaskeformat ikke brukes av en betydelig andel brukere.

Til syvende og sist vil dette med dagens tilgjengelige emballasjeformat være opp til forbruker. Å utstyre hver eneste svanemerkede tøyvaskprodukt kan ikke sees som en garanti for riktig og bærekraftig bruk.

For at ikke dette kravet skal begrenses til kun å gjelde flasker, ber vi derfor Svanen å vurdere en annen formulering av dette kravet, slik at også hvordan dosering og doseringsinformasjon på annen type primæremballasje enn flasker kommer best mulig fram til forbruker.

OHPC er gjerne med på en videre diskusjon.

Comments from Nordic Ecolabelling

Nordisk Miljømerking takker for deres innspill. Vi er i stor grad enige i deres synspunkter. Vi vil omformulere krav O6b og slette krav O6c.

Reckitt Benckiser

O6c) This is not feasible as cap size is based on safety and not dosing.

1. In our specific case, we share cap with rest the remaining EU countries, and a dedicated cap for the swedish market is unfeasible especially as this will most likely require a new bottle and the changes would need to be in-line with safety requirements.

2. WUR is being restricted, and integrating PCR is already a very comprehensive task. Additionally, products are being more concentrated, hence dosing might in the future be reduced, and having a cap reduced in size aligned with dosing is not possible. Especially as different products with different dosing reco share bottle/caps to reduce plastic waste -> this requirement is directly against plastic waste reduction initiatives.

RECO: Focus cannot be on capsizes, as its multifunction role removes all flexibility to have any major changes.

Comments from Nordic Ecolabelling

Nordic Ecolabelling appreciates your input. We admit that it may not be practical to limit the cap size to one normally soiled wash load at soft water. We will delete requirement O6c.

4.5 Sub consultation 2: Performance

07 Fitness for use

McBride plc

Even if there is no budget for performance test changes in this criteria revision, and EU Ecolabel test not seen as a possibility, it might be considered to reformulate the ICE-A* detergent as described in the EU Ecolabel criteria. Here sodium percarbonate is used instead of sodium perborate. When there is an alternative to a CMR classified substance, very well representing a conventional laundry detergent on the market, it should be used.

Comments from Nordic Ecolabelling

Nordic Ecolabelling appreciates your input. We will accept the IEC P reference detergent with percarbonate in place of perborate.

Novozymes A/S

When we interview consumers about eco-friendly products there is one common perception that keeps surfacing: *“eco-friendly products are the same as less-performing products”*. We see that as the key challenge for the future success of eco-friendly products.

We believe that one key solution to this is eco-certifications, like Nordic ecolabelling, which also requires relevant performance standards and for this reason, we believe that the consumer relevance of performance testing can be improved significantly.

We recognize, the comments made in page 15 on Background requirements – Fitness of use in relation to costly test modifications and test proposals, which would be welcomed at a later stage, in particular the points:

- Reference detergent IEC-A: High recommended dosage, contains perborate (CMR classified), and somewhat outdated composition (e.g. on enzymes).
- Stain set: The number of stains is limited, and more consumer relevant stains might be added.

While we fully agree with both these statements, for perborate in particular, we want to note that the substance is actively being phased out in the EU – see regulatory status at <https://echa.europa.eu/substance-information/-/substanceinfo/100.035.597>

This means that in the foreseeable future the reference detergent will not be available for anyone to use, as one of the main ingredients will be banned. We therefore urge Nordic ecolabelling to take this into consideration and start to plan for a new reference detergent in due course. We will be happy to assist in suggesting a more modern detergent for this purpose.

In general, we would therefore still like to take this opportunity to comment on 'Fitness for use' in current criteria, as we find it to be very relevant input and we hope that the budget to look into changes here can be found soon. The future relevance of your Fitness for use criteria depend on it.

Comments from Nordic Ecolabelling

Nordic Ecolabelling appreciates your comments.

We will accept the IEC P reference detergent with percarbonate in place of perborate.

Novozymes A/S

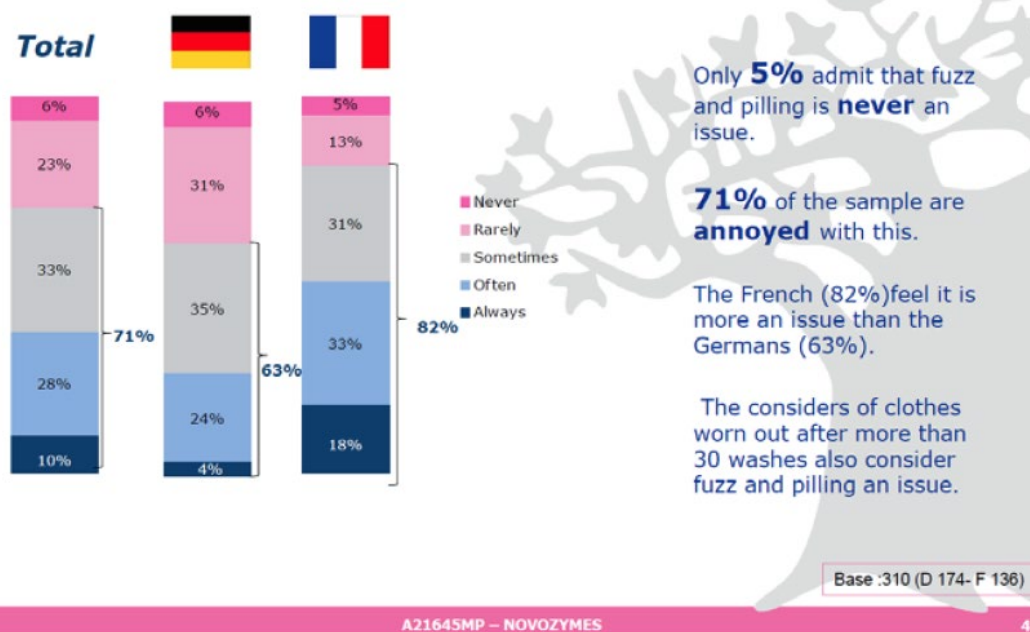
We think one key criteria in the secondary effects can be improved to cater for a major issue in sustainability, the longevity of cloths. Wrap (Waste and Resources Action Programme) highlight pilling as a major issue when addressing the longevity of cloth¹.

This also match the findings in our consumer surveys. From this we can see 71% of consumers find pilling annoying - see snapshot from a consumer's survey done by efficeence 3 for Novozymes.

70% consider fuzz and pilling somewhat of an issue

efficiency ³
EXPERT IN MARKET RESEARCH MANAGEMENT

Q23. How often is fuzz and pilling (formation of small cotton bubbles/balls on the surface) a problem for you when you think of t-shirts, polo-shirts, dresses, sweaters, etc.?



We think this perspective fits closely with the swan label ambition of circular economy and “Requirements for product design”. Therefore, we suggest also to include a criterion on pill count after 10 or 20 wash repetitions.

¹ Sustainable clothing, A practical guide to enhancing clothing durability and quality, June 2017 by WRAP

Comments from Nordic Ecolabelling

Nordic Ecolabelling appreciates your comments. As explained in the background there is no room for major updates of the performance test during the current revision. We will keep your input for future reference.

Novozymes A/S

Stain removers

Novozymes comment

Novozymes agrees with the fact that documentation must be submitted of the performance for all stain types for which the product is claimed to have an effect. However, we believe that the current stain set is not reflecting all the issues faced by the Scandinavian consumers on a regular basis and could contribute to the perception found in some places: that eco-labelled detergents are not performing as well as regular detergents.

To be consumer relevant, stains must be claimed by consumers as frequent. From Novozymes/ Userneeds Survey (2018), based on 617 interviewed consumers in Denmark, Norway and Sweden, the most occurring, relevant and difficult stains are Sweat, Ketchup, Greasy Food, Butter/Oil, Red wine, Pasta sauce, Grass, Blood, see figure 1.

We suggest updating the current stain set/replace some of the current stains with selected of the following 13 stains set

- CFT W-10 N Egg/pigment,
- CFT E-161 Starch,
- CFT CS-33 Sebum pigment,
- CFT PCS-33 Sebum pigment,
- CFT E-112 cocoa milk,
- CFT NZ-H002 Lard with carrot pigment,
- CFT CS-10 Butter fat with colorant,
- WE5DASBWKC Blood,
- Equest WE5BBWKC Beef fat,
- Equest WE5GMWKC Grass/Mud,
- CFT CS-08 Grass,
- Equest WE5TPWKC Tomato puree,
- Equest WE5RWWKC Red Wine

If a consumer relevant stain set as the one proposed above cannot be introduced for specific reasons, we suggest following the EU Flower test criteria (AISE stain set) despite the fact that performance for Nordic Swan is done at much lower water hardness than it is the case for the EU flower.

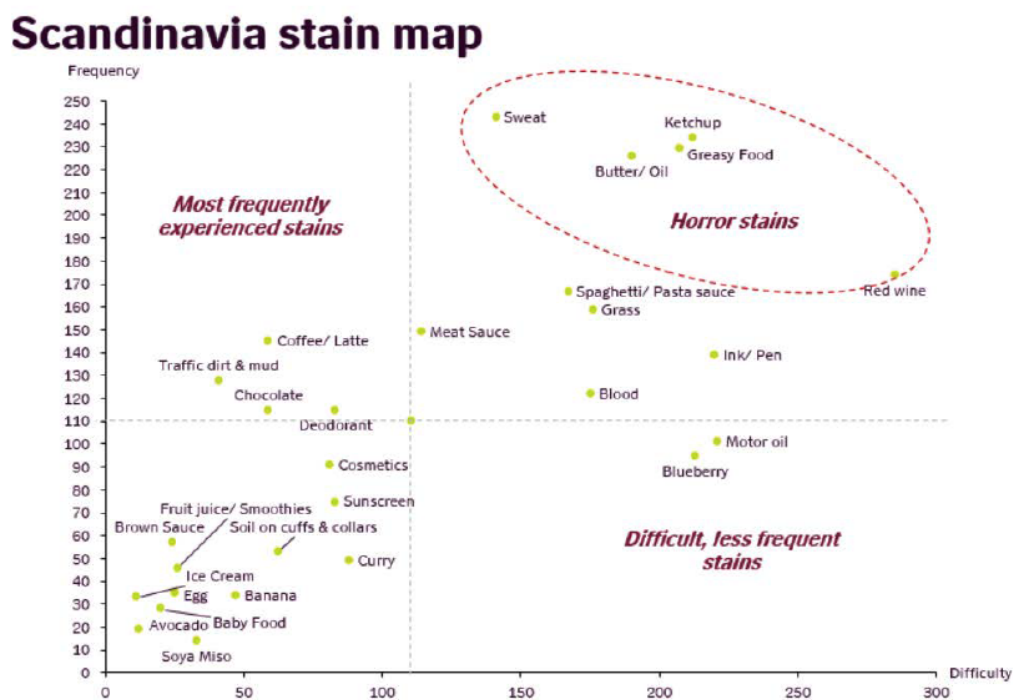


Figure 1 - Stain map constructed based on "Which stains do you find difficult to get off clothes? Prioritize 5 from the list below" and "Which stains do you experience frequently? Prioritize 5 from the list below", 2) Stains with a (0,0) score has been excluded from the stain map, answers of "I don't know" have been excluded from the stain map. Source: Userneeds survey (2018), n=617

Comments from Nordic Ecolabelling

Nordic Ecolabelling appreciates your comments. As explained in the background there is unfortunately not room for major updates of the performance test during the current revision. We will keep your input for future reference. Please note that the table with five stains listed is only an example. The product must be tested on all stain types for

which the product is claimed to have an effect. If no particular stains are emphasized on the product, the product must be tested on a minimum of four different stain strips and the reasons for the choice of stains must be given (see requirement O7).

Upphandlingsmyndigheten

Positivt att effektivitetstestet finns med även i denna version av kriterierna.

Upphandlingsmyndigheten noterar till exempel formuleringar som "may possibly grant exemptions" och "minor changes" i kravet, vilka är lite otydliga

Om miljömärkning ska användas som ett krav vid offentlig upphandling så behöver samtliga krav bland annat vara "objektivt kontrollerbara". Upphandlingsmyndigheten noterar till exempel formuleringar som "may possibly grant exemptions" och "minor changes" i kravet, vilka kan uppfattas som otydliga.

Hänvisningarna till bilagan om undantag stämmer inte överens mellan kravet och bilagan i slutet av dokumentet, den benämns som appendix 7 respektive appendix 5.

Comments from Nordic Ecolabelling

Nordisk Miljømerking takker for deres innspill. Vi vil fjerne avsnittet om mulighet for unntak og det tilhørende bilaget. Vi vil korrigere bilagsnumrene slik at henvisningene blir korrekte.

Orkla Home&Personal Care

OHPC deltar gjerne i drøfting gjeldende ytelsestest. Når det gjelder de foreslåtte mindre endringene, støtter OHPC disse endringene.

Comments from Nordic Ecolabelling

Nordisk Miljømerking takker for støtten.

Reckitt Benckiser

Stain removers:

Issue: As we have over 100 stains this is extremely costly if external data is needed for each stains:

Reco: Make it possible to use external lab for fitness of use test. But open the opportunity to include internal data for additional stains, which can of course be challenged by NS leading to an external test.

Comments from Nordic Ecolabelling

Nordic Ecolabelling appreciates your input. Please note that it is already possible to do the testing internally, provided that the internal laboratory fulfils certain requirements. These requirements have been slightly modified in order to facilitate internal testing even more than in the current criteria generation. See Appendix 1, 1B in the proposed criteria document for sub process 2.

Center for Testmaterials BV

Page 13: It was a bit confusing to us how you approach the performance. We use ΔY all the time, but in the formula $\Delta Y = Y_{\text{washed}} - Y_{\text{soiled}} = Y_w - Y_s$.

But you are looking to the relative performance of the trial product versus the reference, which makes sense in the setup of your standard. It could be considered to mention that when you speak of Reflection value (or better Y value) this is always after the wash.

I am curious how the thresholds are defined, especially in combination with the selection of testmaterials. But when I take two examples, our BC-01 Tea and the CS-27 Potato starch, our tests show that the performance of IEC A* full detergent at 40°C in $\Delta Y = Y_w - Y_s = <10$.

That means the color of the swatch after the reference wash is less than 10 units higher than the soiled swatch. So even if the performance of the Test detergent in question is 0% it will pass the threshold. We have data of all our products and those of our competitors on this. If you are interested, we are happy to discuss this some more. My point being, the thresholds that you have set do not all reflect a performance standard. Washing with water, or not washing at all especially on the starch will have sufficient performance to pass the Ecolabel test. As I said I am curious to learn how you came to these thresholds and what the Nordic Swan Ecolabel ambition is on performance.

Page 14: “where Y_v is the mean reflectance” should be “Where Y_w is the mean reflectance”.

Here another formula is introduced for ΔY . It can be very confusing to have two different definitions of the same parameter, don't you think? Something like $HD\Delta Y$ and $LD\Delta Y$ would that be more clear? In this case you want the product performance in Y value be 5 units better than water. Did you ever receive feedback from users that this is a problem?

In previous standards extensive lists were given for the stain removal tests, or was that in the regular Ecolabel standard?

I am not sure if you are aware, but we can also supply standardized stains on carpet and on upholstery, leather etc.

The term mechanical evaluation is a big vague, maybe even confusing. Objective evaluation would fit better, but I am pretty sure that you mean spectrophotographic analysis, right?

Page 15: IEC-A reference detergent was changed in the 1990's in terms of formulation. Since then it is called IEC-A*. So it should be referred to it like this. You could indeed claim that it is an outdated formulation, however changing a standard reference detergent to developments in the market every year or all the time would not leave much of a standard left then. So we fully agree with your assessment that the use of the IEC A* is the way to go now. Somewhere in time this formula might be updated. But everybody uses it as it is now.

As indicated earlier we would be happy to advise on the selected stains in terms of possible expansion of the set. In my comments on page 29 I have already listed some remarks considering the current set. The term consumer relevant stains always gives me the shivers. We never use it. But we can spend an entire session on that. The

stains that people use as testmaterials should be standardized, reproducible and reliable and give a realistic model for reality. It is relevant to the consumer that they can trust the testresults and that in they end they can buy a detergent that fits their needs in terms of performance, environmental impact and price. How it is tested and in which lab is totally irrelevant to the consumer. As long as this test is a realistic prediction of their actual situation.
Anyway, sorry about that.

Page 16: We at CFT are working at a Greying study for the past 3 years. We intent to present this at the next IDC meeting next month. Maybe this is interesting for you.

Page 17: In terms of the EN ISO 17025 standard for Equipment it seems to me that the MACH 5, based on image analysis technology would comply as well. More and more people are using equipment like the MACH 5 or comparative devices. This saves users a lot of time. Using the MACH 5 works best with 5x5cm swatches stitched on a standardized carrier fabric. This is now how many labs are performing their tests. We have seen a large shift from using Strips (with 10x10cm swatches sewn together) to Monitors with 5x5cm swatches. Monitors which usually offer more room for more swatches as well (up to 24). Because the swatches are smaller the price per stain is much less (4 times as less surface).

Comments from Nordic Ecolabelling

Nordic Ecolabelling appreciates your thorough and detailed comments. Nordic Ecolabelling's ambition on performance is to ensure that the product is fit for use and fulfils the consumers' expectations of a satisfactory functioning detergent. Regarding your specific comment about the ΔY value, we will look into that in more detail at the next major test revision, and we will be happy to discuss it further with you then. The current test was introduced to the Nordic Swan Ecolabelling criteria in 2006. It has been slightly adjusted since then, but the main design is maintained. Notations (such as ΔY and "mechanical evaluation", which indeed is reflectance via spectrophotometer) are well established within the Nordic Swan Ecolabelling framework, and will not be changed until the test is thoroughly revised. Regarding your question about an extensive list for the stain removal standard, a more extensive list is included in the EU Ecolabel criteria. As explained in the background there is not room for major updates of the performance test during the current revision. We will, however, update the typing errors that you have pointed out already now, and include the option of image analysis. We will keep your other inputs for future reference.

wfk - Institut für Angewandte Forschung GmbH

Better explanation what is meant by „ ΔY must be less than -5” For instance „means more negative value”.

Y_v must be Y_w .

Comments from Nordic Ecolabelling

Nordic Ecolabelling appreciates your comments. We will clarify ΔY and correct the typing error.

Appendix 4 Nordic Ecolabelling Performance Test (fitness for use)

SGS Institut Fresenius GmbH

References to EN 60456:2005 - We have the version DIN EN 60456:2017 (translated from EN60456:2016), and some referenced parts do not exist in this version (e.g. in annex 4A, 4.6 “machine filled in accordance with EN 60456:2005 annex C5”: This annex cannot be found in EN60456:2016; Annex 4B, 5.1 secondary effects “Changes in dimension are measured in accordance with EN 60456:2005, Section 12”: Section 10 deals with shrinkage in wool program, a section 12 does not exist.) Maybe it is possible to add a reference to the newer version of EN60456?

Comments from Nordic Ecolabelling

Nordic Ecolabelling appreciates your comments. The current test was introduced to the Nordic Swan Ecolabelling criteria in 2006. As explained in the background there is not room for major updates of the performance test during the current revision. As the test remains basically unchanged, we will maintain the current references and update them once a major update of the test takes place.

Appendix 4A Test description for heavy-duty laundry detergents

McBride plc

The dosage of the reference detergent is very high, 67,5g (3,5 kg load) is a common dosage for medium water hardness. However, the test is run in soft water, and the dosage of the test detergent is also for according to recommendations for soft water. When testing HDD products, perborate and TAED is added on top of that. This gives a dosage of (67,5 g + 17,5 g + 2,6 g)/3,5 kg wash = 25,03 g/kg wash. This is 250% of the maximum dosage for HDD/LDD.

Comments from Nordic Ecolabelling

Nordic Ecolabelling appreciates your comments. The current test was introduced to the Nordic Swan Ecolabelling criteria in 2006. The test is well established, and the reference dose is used for reference/benchmarking purpose only. As explained in the background there is not room for major updates of the performance test during the current revision. Therefore, we will maintain the current reference dose.

Novozymes A/S

Proposed text

For measuring enzyme effect

- Egg/pigment on standard cotton (e.g. wfk 10N or CFT CS-37)
- Starch on standard cotton (potato or rice) (e.g. wfk 10R, empa 161 or CFT CS-27)

For measuring the general cleaning effect

- Sebum/pigment on standard cotton (e.g. wfk 10 D, or empa 118 or CFT CS-33)
- Sebum/pigment on standard polyester/cotton (e.g. wfk 20D or empa)
- Cocoa/milk on standard cotton, aged (e.g. wfk 90 MF, empa 112 or CFT CS-02)

Novozymes comment

Novozymes agrees with the fact that documentation must be submitted of the performance for all stain types for which the product is claimed to have an effect. However, we believe that the current stain set is not reflecting all the issues faced by the Scandinavian consumers on a regular basis and could contribute to the perception found in some places: that eco-labelled detergents are not performing as well as regular detergents.

To be consumer relevant, stains must be claimed by consumers as frequent. From Novozymes/ Userneeds Survey (2018), based on 617 interviewed consumers in Denmark, Norway and Sweden, the most occurring and relevant stains are difficult stains are Sweat, Ketchup, Greasy Food, Butter/Oil, Red wine, Pasta sauce, Grass, Blood, see figure 1.

We suggest updating the current stain set/replace some of the current stains with selected of the following 13 stains set

- CFT W-10 N Egg/pigment,
- CFT E-161 Starch,
- CFT CS-33 Sebum pigment,
- CFT PCS-33 Sebum pigment,
- CFT E-112 cocoa milk,
- CFT NZ-H002 Lard with carrot pigment,
- CFT CS-10 Butter fat with colorant,
- WE5DASBWKC Blood,
- Equest WE5BBWKC Beef fat,
- Equest WE5GMWKC Grass/Mud,
- CFT CS-08 Grass,
- Equest WE5TPWKC Tomato puree,
- Equest WE5RWWKC Red Wine

If a consumer relevant stain set as the one proposed above cannot be introduced for specific reasons, we suggest following the EU Flower test criteria (AISE stain set) despite the fact that performance for Nordic Swan is done at much lower water hardness than it is the case for the EU flower.

Results from a test conducted by Novozymes on Nordic Swan labelled products from Danish and Swedish market, demonstrates that products match the performance of reference detergent IEC-A when tested on current 5 Nordic Swan 5 stains set. However, the situation changes drastically when testing either on testing on a 13 consumer relevant stains-set or AISE stains set.

On those stain set, the performance of Nordic Swan labelled product is significantly lower than reference product, suggesting that there is still space for performance improvement of detergents.

Comments from Nordic Ecolabelling

Nordic Ecolabelling appreciates your comments. As explained in the background there is not room for major updates of the performance test during the current revision. We will keep your input for future reference.

BlueSun

After each wash cycle a cleaning programme must be run.

What is the point of this? it is just a waste of water.

Is it possible to include other [washing machine] models; Miele Softronic?

Reference detergent, IEC-A, consists according to the standard EN 60456:2005 appendix F of the following:

The symbol * [IEC-A*] is missing.

The secondary effects of greying and encrustation do not need to be tested as specified for heavy-duty white wash. Greying is mainly due to the ash contents of powder detergents, and chemical wear is principally caused by bleaching agents. Will this be tested also in liquids?

Is it possible to add the option of comparing the performance test with a high demanded detergent from the market instead of only with the reference detergent ICE-A.

Comments from Nordic Ecolabelling

Nordic Ecolabelling appreciates your comments. The cleaning programme is required in order to ensure that there are no remnants of detergents or soil in the machine. At the next major revision, we will consider whether this requirement can be deleted.

We will check out whether Miele Softronic can be included on the list.

Liquids that do not contain bleaching agents do not have to test for greying and encrustation.

The test must be against the reference detergent, as specified. This ensures a standard reference.

The test must be against the reference detergent, as specified. This ensures a standard reference

SGS Institut Fresenius GmbH

Annex 4A, 2.1: We were happy to notice machine Miele W 1935 WTL was added to selection of test machines.

Annex 4A, 4.3: Secondary effects, chemical wear for bleach-containing detergents is a bit a challenge for us, for our in-house textile lab does not offer this test anymore and we are not able to find an external lab. Can we offer an alternative test (e.g. tensile strength) or do you know a trustworthy lab which provides this test?

Comments from Nordic Ecolabelling

Nordic Ecolabelling appreciates your support. We will investigate if there are other laboratories that provide the prescribed test.

Center for Testmaterials BV

Page 25: ISO 697:1981 is replaced by ISO 697:1983
ISO 2267:1986 is replaced by ISO 2267:2016

Page 27: The Miele W1935 WTL is used by a lot of our customers currently. In our own lab we use the Miele PW6065, possibly you could add that as well?

Please note that the reference IEC-A* in fact implies the full detergent, which consists of: IEC-A*-Base + SPB + TAED

Page 28: EN 60456:2005 is replaced by EN 60456:2016
You could consider listing the article codes for the Sheets, Pillow Cases and Towels. Respectively W-IEC T11, W-IEC T13 and W-IEC T12 (sold by WFK and by CFT)

And/or the Empa version E-352, E-353 and E-351

Page 29: You could consider using the article codes for the standard cotton and the standard polycotton here as well. I would have to double check, but CFT, WFK and Empa will have this as well. Especially when several competitive products are mentioned it is not a commercial purpose, but it is much more convenient for the users of the standards.

To advise on the test strips / soiled standard textiles is of course what we do daily. I will show you some results for the wine and the tea, to have an impression what is behind our advice. We have this kind of information of every testmaterial. As you will see in the comparison of the Red Wine, looking at the colored bars which represent different detergents, there is almost no difference between the three. I have used W-10 Li, which is slightly different to the W-90Li, the latter being on a different cotton will in fact be closer to the CS-03 and the E-114. You can see there is a lot more difference between the different Tea stains. Especially the C-BC-01 stands out, this is because it is produced in a very different way and like all BC-type product treated in such a way that only the bleach effect will show. More comparable to W-10 J and E-167 will our C-S-97 be. Unfortunately the graphs were not listed in my database. My recommendation would be to add the CS-97 and to drop the BS-01 which is a wrong code anyway.

Page 30: CS-33 is a different type of sebum than what is used for W-10 D and E-118. In fact we produce the sebum that they use... This is Sebum Bey. Our CFT product that would be comparable to W-10 D and E-118 would be our C-S-132. CS-33 is less responsive.
PC-S-132 would be our Sebum Bey on Poly/Cotton like W-20 D and E-119.

You recommend a strip form of 10x10cm. I think that you can make a lot of users happy to also accept multiswatch monitors with 5x5cm swatches. WFK and Empa can also supply this. This will imply that elsewhere in the standard some recommendations will have to be altered possibly in terms of measurements. But basically all companies are switching to this to use. On such a multiswatch monitor other stains can be placed as well. If we can offer Standard Nordic Swan monitors (or strips) from stock, that will be less expensive, faster and easier for users.

Could it be an idea to list the testmaterial choices in a table format? That might be more clear?
As indicated before we are happy to give advice how to extend the set.
Obligatory or maybe as optional.

Page 31: How about the Ecolabel liquid reference detergent?
We produce that as well

Page 31, sampling: The use of mixing batches is a good thing. Considered could be the use of a splitter when distributing. Like this:
<https://www.retsch.com/products/assisting/sample-divider/rt/function-features/>

Page 34: You already offer an excel calculation tool on your website right?

Comments from Nordic Ecolabelling

Nordic Ecolabelling appreciates your comments, advices and recommendations. As explained in the background there is not room for major updates of the performance test during the current revision. As the current test is well established, we will keep the lay-out, references and stains unchanged from the previous version. We will, however, correct the incorrect test strip references that you have pointed out. We will keep your other input for future reference.

Miele PW6065 will be included on the list of washing machines.

Regarding your input on multiswatch monitors, please see our comments to your input in requirement O7.

Regarding your input on sampling, using a splitter is accepted.

Currently we do offer an excel tool for calculation of ecotoxicity calculations, but not for the performance test. We will consider to make available an excel calculation tool for the performance test as well.

wfk - Institut für Angewandte Forschung GmbH

In "Summary of the performance test": The reference product, ~~water~~ and test product must be tested in the following order

Email from Maria Tengqvist (svanen.se) on October 4, 2017 „We always write our criteria in one of the Nordic languages and then it is translated into English, so the Nordic version (in this case Danish) is the original. In the Danish criteria document it is stated that a test including only water need not be performed, and it is backed up by the Danish background document where this is further explained.

In 2.1 "Washing machines": It makes little sense to define certain Miele models for carrying out performance tests (and not to accept other models), unless the essential washing parameters such as duration main wash, total program duration, water quantity main wash, total water quantity, number of rinse cycles, final spin speed are still undefined. In version 7.10 you have taken over from the EU Ecolabel performance test with wash program specifications for the washing machines to be approved for the test. It would be important to include it again in the revised document. In addition, it should be required at this point that the washing machines used are without fuzzy logic.

In 2.2 "Wash programmes": IEC-P Base detergent ! Please note for the entire text:

IEC A* = IEC A* base + SPB + TAED

IEC P = IEC P base + SPB + TAED

And also important, IEC A* and IEC A *base detergent is not the same, if the basic detergent without bleach and TAED is meant, "IEC A* base respectively IEC P base must be mentioned.

In 4.2 "Test strips and control strips": The size of the stains is no longer up to date. Nowadays, the stains are more likely to be made up, 5 cm x 5 cm stains are sewn onto a carrier. The smaller stains do not lead to a relevant smaller amount of dirt being washed, the amount of dirt is brought into the system via the wfk-SBL 2004.

Comments from Nordic Ecolabelling

Nordic Ecolabelling appreciates your comments. We will correct the translation mistake and correct the notation for the base detergent, as well as add IEC P base and IEC P. (I.e. we will accept sodium percarbonate as an alternative to sodium perborate.) We will update the size of the stains.

The listed Miele models are especially designed for labs. Upon consultation with Miele we have decided not to specify the washing parameters, as newer machines have different parameters than older ones. Instead, we have chosen to include the following sentence in the washing machine section: Water and energy consumption shall be monitored and recorded in order to ensure equal testing conditions.

Thank you also for correcting several spelling mistakes and inconsistencies in the test description appendix 4A, 4B and 4C (which we have not posted in this response document). We will correct the mistakes.

Appendix 4B Test description for low-duty laundry detergents (for delicate textiles etc.)

Center for Testmaterials BV

Page 37 (2(54): A lot is repetition of course in the text. We already have on our to do list to explore the possibilities of grasping entire standards in simplified tables. This is however not that easy.

Sebum on Acrylic from CFT is PA-S-132. From WFK it's W-50 D
Empa does not offer this.
On wool: W-S-132 and W-60 D
On Silk: S-S-132 and W-70 D

Page 38 (3(54): Olive oil/pigment on Wool is W-02 (yes, no S in the article code!) respectively W-60 B

Also here the option to look at multi swatch monitors.

Comments from Nordic Ecolabelling

Nordic Ecolabelling thanks you for your comments. We will add the missing test strip codes.

wfk - Institut für Angewandte Forschung GmbH

In "Summary of the performance test": The effects of the laundry detergent on coloured textiles are determined by washing 4 differently coloured textiles 20 times in a washing machine at a water temperature of 40 °C.

In 4.1. Wash:

Sebum/pigment on standard acrylic (for products for generally delicate textiles), e.g. wfk 50D

Sebum/pigment on standard wool (for products for wool and generally delicate textiles), e.g. wfk 60D

Sebum/pigment on standard silk (for products for silk and generally delicate textiles), e.g. 70D

Olive oil/pigment on standard wool (for products for wool and generally delicate textiles), e.g. wfk 60B

Comments from Nordic Ecolabelling

Nordic Ecolabelling thanks you for your comments. Color fastness (wool exempted) is indeed tested at 40 °C, as described in paragraph 5.2. We will also add the missing test strip codes.

Appendix 4C Test description for stain removers with subsequent washing

Center for Testmaterials BV

Article 4.2: Same remark on the white fabrics as before

Article 4.3: Should be IEC-A*

And latest edition of that standard is 2016, comes back more often

Article 6: 5 stains are listed. Are they reflected in a selection table or is this free choice?

Comments from Nordic Ecolabelling

Nordic Ecolabelling thanks you for your comments. The table with five stains listed is only an example. The product must be tested on all stain types for which the product is claimed to have an effect. If no particular stains are emphasized on the product, the product must be tested on a minimum of four different stain strips and the reasons for the choice of stains must be given (see requirement O7).

Appendix 4D Test description for stain removers used without subsequent washing

Center for Testmaterials BV

As you might know we are the only producer of standardized testmaterials with a commercial line of dishwasher testmaterials as well. Currently your standard refers to the IKW standard. Maybe this is an interesting topic for another time.

Comments from Nordic Ecolabelling

Nordic Ecolabelling thanks you for your comments. We will contact you for future criteria revisions for dishwasher detergents.

Appendix 5 Preconditions for exemptions from re-testing the performance requirements in accordance with Appendix 4

Reckitt Benckiser

Please include stain removers in this section, as this flexibility should be for both detergent and stain removers.

Comments from Nordic Ecolabelling

Nordic Ecolabelling thanks you for your comments. This section already applies to both detergents and stain removers, unless otherwise specified. (I.e. stain removers are already included e.g. for the exemptions listed in point 1).

4.6 Sub consultation 3: Sustainable renewable raw materials

The general question:

Nordic Ecolabelling would like your opinion on whether it would be possible to go further than this. For example:

- Require RSPO segregated or identity preserved only, and not accepting mass balance level
- Require RSPO NEXT

If this is not possible yet, we would like to have your estimate on when it might be possible.

The received comments are listed below and one common answer from Nordic Ecolabelling after all of the comments.

Blue Sun

Not accepting mass balance will suppose a massive increase in costs and the amount of RSPO without mass balance in the market is extremely low, we will fill more comfortable with the requirements that have been set in the other associations regarding RSPO:

- Ecolabel:

Certificates accepted shall include Roundtable for Sustainable Palm Oil (RSPO) (by identity preserved, segregated or mass balance) or any equivalent or stricter sustainable production scheme.

- Bra Milijoval:

Ingredients that contain raw material obtained from the oil palm (*Elaeis guineensis*) and are not covered by requirement 1.24 must be certified in accordance with RSPO Mass Balance, Segregated or Identity Preserved.

As you know Sustainable Raw materials tend to be more expensive and we will need to add a high % of these raw materials to be able to meet the requirements of the NS performance test. This will have a big impact on the price of our products.

Brenntag Nordic A/S

It is not possible not accepting mass balance level. Several of our manufactures are RSPO members but they deliverer MB product, and if they are going to deliverer segregated or identity preserved it would be quite expensive for both the manufactures but certainly also for the customers. So this is a no go from our point of view.

KiiltoClean Oy

It is very difficult to find suppliers for segregated or identity preserved only level raw materials. We should always have few alternatives because otherwise large companies that could supply these grades will have vantage and this could lead on higher price levels. Even the mass balance level isn't available for all the renewable raw materials.

There should be also beneficial effect for sustainability for choosing the segregated or identity preserved only level. Now it seems that Mass Balance is as ethically produced as segregated or identity preserved only. Difference is only in the level of documentation.

Having too strict criteria could lead companies choosing more synthetic alternatives.

There's no estimation yet when RSPO segregated or identity preserved only / RSPO NEXT could be only possible alternatives.

Kosmetik- och hygienföretagen

KoHF tillsammans med Svensk Dagligvaruhandel och Livsmedelsföretagen tagit fram ett initiativ för Hållbar palmolja. Mycket arbete pågår redan för att öka mängden hållbar palmolja. Det behöver utredas bättre om det finns tillräcklig tillgång på certifierad palmolja.

Vi anser inte att kraven ska skärpas i Svanens kriterier.

Nopa Nordic A/S

RSPO SG kräver att vi kan få råvarorna samt investerar massivt i vores produktion pga. kravet om adskillelse. Dette forventer vi ikke at kunne leve op til inden næste kriterie træder i kraft.

RSPO NEXT kräver att vi för det första köper alla relevanta råvaror ind som MB og det gælder for hele virksomheden ikke kun de svanemærkede, dertil skal vi så købe NEXT kvoter ind som igen vil fordyre produkterne.

Novozymes A/S

General comment on the scope of the third sub process

We can see that there are no proposed changes to the criteria "R2 Product classification" and we assume this means you have decided not to propose the requirement we have seen recently in other Nordic Ecolabelling criteria revisions, regarding products that carry the EUH208 labelling phrase. We are very happy to see it is not proposed here.

Many of the goals set by Nordic ecolabelling, especially those linked directly or indirectly to compaction, will lead to higher percentage concentrations of enzymes in detergent, and unilaterally capping enzymes at <0,1% (by way of not accepting products with the EUH208 label phrase) would be detrimental to innovation within biological detergent solutions.

General RSPO question

You ask for our opinion on whether it would be possible to go further than the proposed requirement. For example:

Require RSPO segregated or identity preserved only, and not accepting mass balance level

Novozymes is a global company with global production and supply chains. We have one major raw material, glycerol, which may be derived from palm oil. We recently got RSPO certification for our global supply of glycerol derived from palm oil, and found in the process, that it was only possible to obtain mass-balance grade, simply due to the availability on the market of the other grades.

Were we to have separate raw materials of several grades and divide product ranges into 'Nordic ecolabelling' vs not 'Nordic ecolabelling' products, would be a disproportionate burden for us and our customers, with little to no impact on global

sustainable production of palm oil. In fact, we believe it is probably much better that all of our global supply of glycerol is now mass-balance grade, as compared to a situation where only a small proportion of what we buy was of a higher grade, while the rest was not certified at all.

So, while we praise the goal of increased sustainable raw material production, *at least for something like glycerol*, it will be tough to honor a requirement for only segregated or identity preserved – at least at this point in time.

Nouryon

In response to your request for public comment on your consideration for using RSPO segregated and/or NEXT products in future iterations of the Nordic Ecolabel criteria, please see the following comments:

- The current supply chain for RSPO segregated raw materials is far more constrained today and due to the extra complexity in upstream supply, segregated manufacture and complex downstream sale, is far more expensive than the current RSPO MB materials available today (already far more expensive than standard materials). This cost element inevitably has to be passed on to the consumer.
- An important unanswered question associated with the cost and complexity of RSPO segregated is what is the consumer value-add is versus the RSPO MB version in existence today. Do consumers understand these benefits, and if so, is the cost/performance benefit acceptable versus the current RSPO MB system? I cannot comment on this. Given the extra costs, complexity and handling requirements of segregation, is the overall impact on the environment improved vs. RSPO MB by the time the consumer received the material?
- An example of the complexity even with the current RSPO MB system today, is that for certain raw materials, we struggle to find RSPO versions. The portfolio of raw materials will be further reduced by adoption of the alternate RSPO options in discussion. Exceptions from adherence to any criteria revision will have to be made where necessary raw materials are just not commercially available – I suppose reverting to RSPO MB in such a case. I would thoroughly recommend engaging the RSPO authorities on the subject of the maturity of their supply chain and their certified raw material product portfolio to get a better picture of what might be achievable, in what quantities, and what a realistic timeline to full adoption would likely be.
- An important consideration is the manufacturing complexity issue that arises from segregation that is not there with MB. With RSPO MB, plant processes need not be significantly altered as the RSPO content is calculated through the system on a mass balance basis. In segregation, bulk storage of mixed raw materials is no longer allowed. Installation of segregated bulk storage tanks requires significant investment and long leadtimes to installation – assuming that the business case can be effectively argued (typically Nordic Ecolabel demand is relatively small). We are talking a 5 year window for transition as a minimum.
- Further to the extended timeline observation, if the authorities do wish to go this route, I would thoroughly recommend that any decision by Nordic Ecolabel be done in concert with EU Ecolabel collectively, and be applied for all RSPO materials at the same time. This will make the business case for change/investment far more robust. If the approach is piecemeal,

investments cannot be justified, which would lead to withdrawal of some of the products offered for Nordic Ecolabel today, or adoption of alternatives that have lesser cost/complexity than what is proposed. I would say the leadtime for implementation of such a change should be a minimum of 5 years before compliance is required – with exceptions allowed where RM' are not available. Differing timelines for adoption of new standards between Nordic and EU Ecolabel will also mean that both RSPO MB, RSPO segregated and standard products will need to be made available to the market concurrently, and this is not a viable business model.

Overall, I think the case for adoption of any of the proposed alternatives needs to be better understood, including consumer opinion. I believe the vast majority of the benefits are already derived with RSPO MB. However, if the consumer drive is there, and the supply chain is adaptable enough to cope, then a longer term (ca. 10 year) program of transition could be initiated (preferably in concert with EU Ecolabel), but it will not be without risk, with potential commercial and product portfolio consequences.

Disclaimers: the above view and opinion is a personal view on this subject, and does not necessarily reflect the opinion of the organization I work for. Also, I have not read sufficiently on RSPO NEXT criteria to be able to offer an opinion, but I believe it is a further complexation of the supply chain, with an even less clear consumer value proposition than segregation. My comments above are reserved for segregation at this stage.

Orkla Home & Personal Care

OHPC stiller seg positive til at dette står på agendaen, men det er vanskelig å etterkomme et krav om segregert palmeolje. Det er pr i dag ikke realistisk da det ikke er nok segregert tilgjengelige palmeoljederivater på markedet. Vårt forslag er at dette tas opp igjen ved neste revisjon.

Senzora bv

Nordic Ecolabelling would like your opinion on whether it would be possible to go further than this. For example:

- *Require RSPO segregated or identity preserved only, and not accepting mass balance level*
- *Require RSPO NEXT*

These requirements are not realistic yet.

We have spoken with our suppliers. They cannot supply us with the raw materials as segregated or identity preserved. It is not because they do not want it, but because in practice this is not possible yet for the volumes needed. It might take some years before they are able to do so. The same is true for the requirement 'RSPO Next'.

A supplier said to us that 'mass balance' has only just started. They expect it to grow in the coming years, but it is still relatively small. Harder requirements cannot be fulfilled due to the complexity this would cause in the supply chain and the resulting costs.

Comments from Nordic Ecolabelling

Thank you for your comments. We understand that it is not possible to set more ambitious requirements than RSPO mass balance at this time. We will continue to follow the matter in future revisions.

Konsumentverket

Konsumentverket has no opinion whether it is possible or desirable to go beyond proposed criteria, for example by imposing requirements on only RSPO segregated or identity preserved, according to your question.

One reflection: to be able to increase the amount of identity preserved/ segregated palm oil – if that is desirable - could an alternative way be as follow, marked yellow (this is just a thought, not an opinion)?

- *Palm oil, palm kernel oil and palm oil/palm kernel oil derivatives must be certified according to RSPO. Mass Balance, Segregated or Identity Preserved are accepted as traceability systems.*
- In addition, the share of RSPO Segregated or Identity Preserved must increase. The licence holder must document that they are working to increase their purchasing of RSPO Segregated or Identity preserved. (similar to what's imposed on renewable raw materials)

Comments from Nordic Ecolabelling

Thank you for your comments. As it seems not yet to be possible to require this yet, we have added it as an example to the policy requirement on renewable raw material and hope it will encourage producers to start asking for more ambitious traceability.

O8 Sustainable raw materials

Upphandlingsmyndigheten

O1 Sustainable raw materials

Upphandlingsmyndigheten anser att det är positivt med krav om hållbara råvaror.

Comments from Nordic Ecolabelling

Tack för stödet.

Kosmetik- och hygienföretagen

Det är en rimlig nivå att efterfråga licenstagarnas policy för arbete med hållbara råvaror för att dokumentera detta arbete. Vi anser att Svanen ska prioritera den databas för dokumenthantering som har diskuterats under lång tid. Detta för att underlätta hantering och lagring av dokumentation som är generell för flera produktgrupper och licenstagare.

Comments from Nordic Ecolabelling

Tack för stödet. Vi jobbar med saken och förhoppningsvis syns det redan vid omprövning av textiltvättmedel och fläckborrtagare.

Orkla Home & Personal Care

OHPC stiller seg positive til at det dokumenteres med policy eller lignende dokument for å tydeliggjøre sitt arbeid for bruk av fornybare og bærekraftige materialer. Dette gjør OHPC i dag ved hjelp av sin bedriftspolicy om bærekraft og medlemskap i RSPO (Roundtable on Sustainable Palm Oil) som innebærer blant annet palmeoljeregnskap og årlige audits.

Vi stiller oss også positive til at appendix 3 brukes. Allikevel, vi ser at det blir vanskeligere å få leverandørene til å fylle ut appendix 3 da de får mange tilsvarende

henvendelser. Det vil være en fordel å opprettholde samme appendix over tid og på tvers av ulike kriterier (håndoppvask, rengjøring, kosmetikk etc).

Comments from Nordic Ecolabelling

Tack för stödet. Vi håller på med arbetet som förhoppningsvis leder till ett gemensamt appendix tvärs över de kemtekniska produktgrupperna.

Novozymes A/S

It is unclear to us whether this requirement is a new requirement that will be added to the existing R13 requirement in the current criteria version 7, or if this requirement will replace the old R13. Our comment looks at the new O2 in isolation.

Our conclusion:

We find that the O1 requirement, if understood correctly, will place a disproportionate high burden on enzyme producers, or producers of other complex mixtures, and we ask that a more reasonable solution is found for enzymes!

Enzymes are always sold as complex formulated mixtures and in some cases the enzyme raw material can even contain as many different ingredients as the rest of the detergent. Many of the raw materials we use to formulate our products are inert renewable materials like cellulose, dextrin, sucrose, glucose, glycerol, sorbitol etc. As a global company we produce at several sites and often have two or more suppliers of these inert ingredients at every site, each with some variation in production and origin – and these materials can even have mixed origin for the same supplier. For part a), proportion, it will be doable to provide a percentage range for total amount of ingredients in an enzyme product which is renewable.

Clarifying question: Are you asking for a percentage of the total raw material which is renewable or do you want the inorganic components removed before the percentage is calculated?

i.e. in the formula: $\text{Used amount renewable material} / (\text{used amount renewable material} + \text{used amount non-renewable material}) \times 100\%$, does the part marked in yellow also include the inorganic components of the raw material?

For part b) and c), completing the proposed Appendix 3 for each supplier of each renewable raw material in an enzyme product will be a disproportionate burden with no real value added. And since we, for commercial reasons, never inform our customers of the identity of our suppliers, we could no longer provide the Appendix 3 raw material declaration directly to our customers.

This will likely significantly increase the burden of the review process at the Nordic ecolabelling certifying bodies. *And as an example, we are talking here about potentially reviewing documentation from 10 different suppliers of Cellulose, which will end up being present at ~0,1% or less in the final detergent(!)*

We therefore ask that enzyme raw materials are excluded from the proposed O1, or at the very least from items b) and c) – or that some other way is found of lowering this disproportionate burden on complex formulated detergent ingredients, like enzymes.

Comments from Nordic Ecolabelling

This requirement will replace the current R13.

We have added the same 1 % limit value to the part 2 in this requirement as we have for requirement on palmoil.

O9 Certified raw materials from oil palms

Rainforest Foundation Norway (RFN)

Rainforest Foundation Norway (RFN) is grateful for the opportunity to participate in the consultation on Nordic Ecolabelling's revised requirements for laundry detergents and stain removers.

RFN's comments focus on the criteria for use of palm oil. As Nordic Ecolabelling itself describes in its background note, palm oil production is linked to major environmental harm in the form of destruction of rainforest and peatland, causing biodiversity loss and enormous greenhouse gas emissions. The industry is also linked to human rights violations, including in the form of landgrabbing from local communities and exploitation of plantation workers. Fortunately, pressure from consumers, investors and buyers is causing the industry to change for the better. Many palm oil companies have undertaken commitments to avoid deforestation in their operations and supply chains. In terms of implementation, however, independent evaluations show that there is still a long way to go. No companies fully meet their obligations, and many make very little progress. It is therefore very important to maintain the pressure on the palm oil industry and continue to demand continuous improvement.

RFN believes that Nordic Ecolabelling should apply the following criteria for the use of palm oil in all products:

- Documentation that no raw materials may have been used that have contributed to deforestation.
- Suppliers of raw materials with deforestation risk must document that their entire production and supply chain is deforestation-free.

RFN agrees with Nordic Ecolabelling that the RSPO standard is by itself not sufficient to guarantee that certified palm oil is not linked to deforestation or human rights violations. There is still insufficient transparency in the supply chain, the control mechanisms are not stringent enough and there is a big problem of certified producers using income from old, certified plantations to finance deforestation for new plantation development in other areas. Having said that, it should be noted that RSPO significantly upgraded its Principles and Criteria in October 2018, effectively banning all deforestation and peatland development. This positive development gives hope that RSPO certification may be one of several tools that can be used to reduce the risk of tropical deforestation in supply chains, but it is far from good enough alone.

Rainforest Foundation Norway is of the opinion that the proposed requirement ("O2: Certified raw materials from oil palms") on using certified palm oil from the RSPO categories Mass Balance (MB), Segregated and Identity Preserved (IP) is too weak because RSPO certification by itself does not guarantee that the physical palm oil is deforestation free nor that the producer is deforestation-free in all its operations. Mass balance is a completely untraceable blend of certified and non-certified palm oil, and should therefore not be accepted by the criteria of Nordic Ecolabelling. Documented use of segregated or IP palm oil could be approved as partial evidence that the above requirements proposed by RFN have been met, but only if additional evidence is presented that the supply chain is completely free of deforestation and comes from growers that are committed to avoiding deforestation in all their activities.

We are aware that obtaining documented deforestation-free palm oil is challenging today. We also know that several major companies work seriously to achieve this and will be able to fulfill the criteria we propose. For the Nordic Ecolabel to function as a quality label that motivates companies to go the extra mile in making environmentally friendly choices, consumers should be able to trust that the label is only granted to the best in class. It is therefore very important that requirements are not set too low.

Rainforest Foundation Norway has the following recommendations for cleaning agent manufacturers:

- Adopt a company policy and action plan to exclude from the supply chain products and producers linked to deforestation
- Reduce the use of palm oil wherever possible
- Only use suppliers who can prove that their entire production is deforestation free
- Avoid all use of RSPO Credits
- Require tracing of palm oil to the plantation

Comments from Nordic Ecolabelling

Thank you for your comments. We agree with you. It seems not yet to be possible to make your recommendations to obligatory requirements, but some of them are written as examples in the policy requirement and we hope it will encourage producers to start asking for this information.

Orkla Home & Personal Care

OHPC stiller seg positive til at palmeolje, palmekjerneolje og palmeolje-/palmekjerneolje derivater må være sertifisert etter RSPO som Mass Balanced, Segregated eller Identity Preserved, samt å legge fram et gyldig RSPO CoC sertifikat.

Dette er krav som allerede er gjeldende for Håndoppraskmidler. Å implementere dette også for tekstilvaskemidler er riktig.

Comments from Nordic Ecolabelling

Tack för stödet.

Upphandlingsmyndigheten

Upphandlingsmyndigheten stöder förslaget om certifierade råvaror från oljepalmer. Det är ur upphandlingssynpunkt positivt att kravet är formulerat på samma sätt som i handdiskmedel och rengöringsmedel, då Upphandlingsmyndighetens kriterier för kemiska produkter omfattar alla dessa tre produktgrupper.

I Upphandlingsmyndighetens pågående arbete med revidering av kriterier för kemiska produkter har motsvarande krav föreslagits med en kompletterande text angående att RSPO Credits inte kan jämföras med RSPO mass balance, segregated eller identity preserved.

Comments from Nordic Ecolabelling

Tack för stödet. Svanenmärkning menar att genom att lista de accepterade system görs det även tydligt vilka system inte accepteras.

Brenntag Nordic A/S

Ok, that the manufacture has to be RSPO certified, and we are willing to inform about the RSPO number

A valid RSPO CoC from the raw material producer will not be available

We will not be able to supply Nordic Swan with invoices/delivery notes that the palm oil is certified and according to which system

We are a distributor, and do not publicate any of our invoices from any manufactures to any outside parties, but will always inform about the RSPO status.

Appendix 3 Declaration from the manufacturer of the raw material/ingredient

The declaration have to be filled out by the manufacturer of the raw material.

Due to we are a distributor we do fill a lot of the questionnaires out on behalf of the actual manufactures.

Many of our manufactures do not fill any kind of questionnaires but are able to supply us with all the relevant documentation/information according to whatever is required in the questionnaire. So if the manufacturer is a mandatory issue, we will have a hard time to fulfill these questionnaires in the future to our customers

Comments from Nordic Ecolabelling

Thank you for your feedback. We have changed the appendix so that both manufacturer and supplier can fill it if they have all relevant information.

4.7 Sub consultation 3: Micro plastics and other excluded substances

O10 Excluded substances – Microplastics

A common answer to all stakeholders can be found after the comments below.

The Danish Association of Cosmetics and Detergents

Regarding the criteria for microplastics in laundry detergents and stain removers, we see no reason to include ECHA's definition of microplastics in the new criteria since the regulation of microplastics at EU level is expected to enter into force from 2021. The environmental and health consequences of the release of microplastics in the environment is still an underexposed area, and there is still a knowledge gap that needs to be covered before conclusions can be drawn, which can be the basis for regulation. We therefore encourage the experts in ECHA to complete their work before determining which criteria should apply to microplastics in laundry detergents and stain removers. If you still want to apply ECHA's definition in the new criteria, it is important to include the derogations which also are a part of ECHA's restriction proposal. (See ECHA's restriction proposal p. 16-18).

Kosmetik- och hygienföretagen

Ett förbud för mikroplast enligt ECHAs definition är för tidigt att införa i Svanens kriterier. ECHAs skrivelse är fortfarande bara ett förslag, vilket kan komma att ändras, både gällande definitioner och omfattning. Förslaget är fortfarande mycket

oklart gällande vilka polymerer som kan komma att omfattas och vad konsekvenserna i så fall blir. Branschen ser att det skulle kunna omfattas mycket mer än de mikrokorn av plast "microbeads" som ursprungligen avsågs. Om Svanen avser att förbjuda det som ursprungligen avsågs som mikroplast, det vill säga mikrokorn av plast, så ser vi det som en möjlig väg framåt. Mikrokorn av plast är på väg att fasas ut från tvätt- och rengöringsmedel. På några år har användningen minskat till hälften inom Europa men man har inte nått ända fram än.

ECHA har i sin rapport bedömt att en övergångstid på 5 år behövs för att formulera om produkter i tvätt- och rengöringsbranschen för att klara ett eventuellt förbud enligt den föreslagna definitionen för mikroplast. Därför är det inte rimligt att Svanen inför ett förbud enligt ECHAs definition med kortare övergångstid än så. Ett förbud för mikroplaster i tvätt- och rengöringsprodukter enligt REACH innebär i princip att ett förbud i Svanens kriterier är överflödigt. Vi anser generellt att Svanen inte ska införa krav i kriterierna som redan är lagkrav eller är på väg att bli ett lagkrav, eller som inte är relevanta för produktgruppen i fråga. Om Svanens kriterier hänvisar till ECHAs definition för mikroplast är det mycket viktigt att också hänvisa till de övriga tolkningar som ECHA gör för t.ex. löslighet och bionedbrytbarhet.

Nopa Nordic A/S

Den nuværende definition på mikroplastik fra ECHA er så bred at vi ikke kan bruge vores forskellige polymere, uden dem får vi meget svært ved at opnå den krævede funktion.

Der står som baggrund side 6 at MM may come to update the definition ...if a new definition is accepted in the EU

det er vigtigt at det ikke er et may men must!

Side 7: De skriver at foils/films wrapping tablets ikke må udlede mikroplast.

Vores nuværende PVA film bliver betragtet som bionedbrydeligt. Det forventer vi stadig kommer til at gælde, men der er jo ikke en klar definition i fra ECHA endnu på hvad der er bionedbrydeligt. Så dette krav kan gå ud over ADW tabs!

Generelt for Mikroplast oplever vi at der er stor uklarhed om definitionerne på hvilke molekyler, bionedbrydelighed, vandopløselighed og hvad er plastik (beholder molekylet sin form efter brug etc..).

Derfor er det meget vigtigt at afvente EUkommisionen/ECHA 's definition.

Så længe EU arbejder på lovgivning ang. mikroplast vil det være mest hensigtsmæssigt at svanen læner sig op af denne lovgivning og først når den er på plads overvejer om svanen skal stille skrapere krav.

Novozymes A/S

We would like to praise Nordic ecolabelling in adopting strict requirements with regards to Microplastics and the alignment with the proposed EU definition, which is very reasonable. Having a different definition in ecolabelling would be confusing. We therefore have nothing in the way of requests for changes to this criteria points, only a few comments.

We note that while ECHA has proposed several exemptions from their restriction, there are none of these exemptions in your proposal. Everything that fits the definition is banned. This is indeed ambitious, but it makes very good sense for ecolabelling to go beyond regulatory requirements in this area!

It means of course that you will ban from Nordic ecolabeling all polymers which fit the definition even if they are water soluble, but exclude entirely from the scope of O3 those polymers that are no longer in solid particle form in the detergent. This leads to a situation where a non-biodegradable *water soluble* synthetic polymer will be banned in a Nordic ecolabel powder detergent, whereas the exact same polymer ingredient will be accepted in a Nordic ecolabel liquid detergent (unless it fails on other criteria due to the persistence). However, the impact to the environment from the two situations will be exactly the same.

If it is the impact on the environment after wash, which is important to Nordic ecolabelling, a natural step could be for Nordic ecolabelling to also ban those non-biodegradable synthetic polymers, which in their pure form meets the microplastic definition, even if they happen to be dissolved in the detergent as sold, thus providing the same “playing field” (and promote the same innovation into biodegradable solutions) for both solid and liquid detergents alike.

Background to requirement O3 Prohibited substances

We would like to briefly comment on this part of your background text:

“Microplastics can according to the report be used as e.g. rheology modifiers and enzyme encapsulation (30- 5000µm).”

Enzyme granulates from Novozymes are encapsulated with both an inorganic salt coating and a ‘wax’ coating. The wax is a readily biodegradable polymer, Polyethylene glycol, of MW 4000 g/mol (DID-list # 2539). Due to the biodegradability profile, the polymer used in our enzyme encapsulation of granulates does **not** meet the definition of Microplastic.

Other common polymers in enzyme granulates are natural, like cellulose or dextrin.

Orkla Home & Personal Care

Vi ser det som positivt at Svanen bruker samme definisjon av ”microplastics” som ECHA foreslår. Vi er også klar over at begrepet kan komme til å tolkes ulikt, avhengig av hvordan stoffet opptre i vannløsning/suspensjon/dispersjon, og at et stoffs tendens til å opptre som ”partikkel” er sterkt avhengig av ulike miljøfaktorer. I denne sammenhengen er det viktig at Svanen holder seg til de tolkninger som ECHA gjør, og ikke gjør egne tolkninger som kan komme til å skille seg ut fra de som blir aksepterte av ECHA.

Det samme gjelder for hvordan man skal definere begrepet ”(bio)degradable”. Her foresår ECHA en veldig bred definisjon, dvs den skal på en eller annen måte være mulig å bevise at stoffet ikke er persistent i miljøet, og en rekke ulike testmetoder brukes til å påvise dette. Også her er det viktig at ikke Svanen gjør andre tolkninger i denne situasjonen.

Comments from Nordic Ecolabelling

Thank you for your comments. We will continue to follow the development in the EU. While doing so we will use the current working definition of microplastics.

We have currently taken into account the derogations on polymers that occur in nature that have not been chemically modified (other than by hydrolysis) and polymers that are (bio)degradable. The ones concerning industrial or medical use etc. are not relevant for laundry detergents as this requirement excludes microplastics added to the final product.

Upphandlingsmyndigheten

Upphandlingsmyndigheten är positiva till att mikroplaster utesluts ur produkterna.

Svenskt Vatten

Svenskt Vatten supports the **Requirement O3 Prohibited substances** *The following substances are excluded from use in the product: • Microplastics**

Comments from Nordic Ecolabelling

Thank you for your supportive comment.

5 Comments to the background of the criteria

5.1 Sub consultation 2: Dosing, ecotoxicity and biodegradability; Consumer guidance; Performance

5.1.1 Background to requirement O7 Fitness for use

BlueSun

It has been clarified that it is not mandatory to test greying and encrustation for liquid laundry detergents for whitewash without bleach. Greying is mainly due to the ash contents of powder detergents, and chemical wear is principally caused by bleaching agents.

Very glad to have this as a new requirement!!!

Comments from Nordic Ecolabelling

Nordic Ecolabelling appreciates your support.

6 Discussions and conclusions

Several consultation comments have been received to the proposed sub criteria. The comments focus on the proposed new and adjusted requirements. Nordic Ecolabelling is grateful for all responses.

Most comments were received in the first sub consultation on packaging and the biggest changes have been made to these requirements. The percentage of recycled plastics in packaging has been reduced from 75 % to 50 % and several changes has been made to requirement on design for recycling.

All requirements on sub consultation were commented on and smaller adjustments have been made to other requirements as well. These changes are listed in the table 4 below.

Table 4: Overview of main changes done in the draft generation 8 of criteria for laundry detergents and stain removers, based on received consultation responses in the three sub processes.

(Please note that there are also some changes in the draft generation 8 compared to criteria generation 7, on criteria that have not been part of sub-consultation process. These changes are not listed in this table.)

Sub consultation no; Requirement	Requirement in final draft for consultation	Change in the requirements after the consultation
1; O1	O16	Second bullet point deleted.
1; O2	O19	<ul style="list-style-type: none"> The requirement that it must be possible to recycle primary packaging in today's existing material recirculation systems has been deleted, as this will be ensured through fulfilment of requirement O19-O21. The percentage of required post-consumer recycled (PCR) material has been adjusted. A definition of PCR has been included.
1; O3	O20	<ul style="list-style-type: none"> Several exemptions added (eg. for spray triggers in stain removers, for use of TPE in closures for squeeze bottles, for metal springs in pump bottles). The restrictions on colors have been modified. Some clarifications made (eg. that silicone is not allowed in closures, that barriers are not allowed, that PET-G cannot be used in labels).
1; O4	O21	<ul style="list-style-type: none"> The restriction on black pigment has been modified. Clarified that silicone is not allowed in closures.
1; O5	O22	WUR limits adjusted because the percentage of required PCR material has been adjusted.
2; O1	O10	Maximum dosage for heavy-duty and light-duty laundry detergents adjusted from 10.0 to 11.0 g/kg wash.
2; O2	O11	No change of significance (fonts clarified).
2; O3	O12	No change.
2; O4	O13	No change of significance (wording slightly clarified).
2; O5	O8	No change of significance (wording slightly clarified).
2; O6	O14	<ul style="list-style-type: none"> The requirement that cap size shall not exceed the recommended dosage for one normally soiled wash load at soft water has been deleted. Dosing instructions for other formats than liquid products contained in conventional bottle has been added.
2; O7	O18	<ul style="list-style-type: none"> Typing errors corrected The paragraph "Exceptions to the above requirements" has been deleted.
2; Appendix 4A (and corresponding changes to Appendix 4B and 4C)	Appendix 5A	<ul style="list-style-type: none"> Miele PW6065 added to the list of washing machines. Water and energy consumption shall be monitored and recorded in order to ensure equal testing conditions. IEC P reference detergent added (making percarbonate an alternative to perborate) Some stain codes have been corrected Possibility to use smaller stains of 5 cm x 5cm has been added Possibility to use a multi-image analysis device and multiswatch monitors for the measurement of stain removal has been added
2; Appendix 4B	Appendix 5B	<ul style="list-style-type: none"> Water hardness changed to $5.5 \pm 0.5^{\circ}\text{dH}$ Some stain codes have been corrected Color fastness (wool exempted): It has been clarified that other textiles ("fabrics") with a pre-determined color fastness of 4 can also be used.
2; Appendix 5		Appendix 5 ("Preconditions for exemptions from retesting the performance requirements in accordance with Appendix 4") has been deleted.
3; O1	O3	<ul style="list-style-type: none"> A cut-off limit of 1% has been introduced. It has been clarified that Appendix 3 is accepted from raw material manufacturers or other kind of suppliers.
3; O2	O4	No change.
3; O3	O6	<ul style="list-style-type: none"> Only microplastics was included in sub-consultation 3. The complete list of proposed, prohibited substances is now included.
3; Appendix 2 and 3	Appendix 2 and 3	<ul style="list-style-type: none"> Only a few substances was included in sub-consultation 3. The complete list of proposed, prohibited substances is now included. It has been clarified that Appendix 3 is accepted from raw material manufacturers or other kind of suppliers. Role in supply chain must be specified.

