

About Nordic Ecolabelled

Transport wash installations



Version 3.7

**Background to ecolabelling
06 February 2024**

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This document is a translation of an original in Norwegian. In case of dispute, the original document should be taken as authoritative.

Addresses

In 1989, the Nordic Council of Ministers decided to introduce a voluntary official ecolabel, the Nordic Swan Ecolabel. These organisations/companies operate the Nordic Ecolabelling system on behalf of their own country's government. For more information, see the websites:

Denmark

Ecolabelling Denmark
info@ecolabel.dk
www.svanemaerket.dk

Finland

Ecolabelling Finland
joutsen@ecolabel.fi
www.ecolabel.fi

Iceland

Ecolabelling Iceland
svanurinn@ust.is
www.svanurinn.is

Norway

Ecolabelling Norway
info@svanemarket.no
www.svanemarket.no

Sweden

Ecolabelling Sweden
info@svanen.se
www.svanen.se

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1 Summary

Transport wash installations affect the environment through considerable consumption of water and chemicals, and through emissions of contaminated wash water. Emissions of undesirable chemicals, metals and organic substances can be significantly limited by choosing specifically adapted cleaning chemicals, tailoring the treatment technology to the washing method and having sound procedures in place for operation and maintenance.

The purpose of this document is to present the background to the criteria for Nordic Ecolabelling of transport wash installations.

The document explains why Nordic Ecolabelling has chosen to ecolabel transport wash installations and gives the background to the individual requirements as they relate to the environmental goals in Nordic Ecolabelling's environmental philosophy. The criteria focus on:

- The design of the wash installation and water treatment unit
- Reduce emissions and water consumption
- Requirements regarding chemicals
- Emission controls and waste management
- Environmental management, including procedures for operation and maintenance

This revision has introduced a system where total suppliers of washing units, chemicals and water treatment units may obtain a basic licence for their washing technology.

Other key changes in this generation are a change to the requirements concerning initial sampling, sampling periods and number of analyses, plus tighter emission requirements. The chemical requirements have now been incorporated into the document and updated in line with the most recent criteria for car and boat care products, version 5.2, which entails tighter new requirements regarding nanoparticles, CMR and a ban on PVC in packaging.

The most significant environmental improvements deriving from these changes are tighter emission requirements for the metals lead, nickel, chromium and cadmium, stricter chemical requirements as a consequence of updating the chemical requirements, more concrete energy requirements and requirements concerning waste management. A key change in the new criteria is that procedures for initial sampling, ongoing sampling and self-assessment have been made clearer. Experience has shown that clear procedures for operations, sampling and maintenance are important for a successful wash installation, which is a key condition for complying with the emission requirements.

2 Basic facts about the criteria

Products that can be labelled

Criteria for transport wash installations are primarily tailored to automated and/or manual pre-programmed wash installations for passenger cars and automated wash installations for buses, trucks, trains and other rail transport.

Experience from the Nordic Ecolabelling of wash installations for cars shows that the supplier of washing and water treatment units is often a total supplier of washing and water treatment units and associated chemicals, as well as servicing. This means that such total suppliers know which chemicals are best suited to the installations, conduct water analyses, measure water consumption and know what procedures are necessary during everyday operation to keep the wash installation working properly.

Many wash installations for cars prefer to maintain a contract with such a total supplier. Against this background, a desire has been expressed for such total suppliers to be able to obtain their own 'basic licence', which can then be used by wash installations that wish to Nordic Swan Ecolabel their operation.

Nordic Ecolabelling does not want a supplier solely of washing units or chemicals or water treatment units to be able to receive either a regular licence or a basic licence. It is important to ensure that the holder of the basic licence has overall responsibility for deliveries, matching chemicals and units.

As a consequence of this, the product group parameters have been amended:

Wash installations for passenger cars, buses, trucks*, trains and other rail transport can be Nordic Swan Ecolabelled.

The wash installations must be automated and/or manual, pre-programmed installations.

Wash installations for containers and for use in other services, such as reconditioning and repairs, are not covered by the criteria. Graffiti wash installations are also not covered by the criteria.

The licensee of the Nordic Swan Ecolabelled transport wash installation is the owner of the wash installation (such as a petrol station). Total suppliers of washing units, chemicals and water treatment units may obtain a **basic licence** as defined below.

- Wash installations that apply for Nordic Swan Ecolabelling must meet all the requirements in the criteria document. Wash installations for trains and other rail transport are exempt from requirements O4 and O36.
- Where wash installations use washing equipment, washing chemicals, water treatment chemicals and water treatment units from a supplier with a basic licence (see explanation below), it must state on the licence which basic licence holder is being used. Wash installations that apply for a licence to cover washing equipment, washing chemicals, water treatment chemicals and water treatment units from a supplier with a basic licence must meet all the requirements in the criteria document, but are not required to submit documentation for each requirement where the supplier (basic licence holder) has already submitted such documentation. This applies to the following requirements:
 - Initial sampling (O5)

- Water treatment chemicals (O9)
- Chemical requirements O10–O24

** Passenger car means a vehicle designed for the transportation of no more than 9 people including the driver. The term truck denotes a heavy truck larger than 3.5 tonnes, with or without trailer. The term bus denotes a vehicle that is registered for more than 9 persons.*

Basic licence

A total supplier of washing units, chemicals and water treatment units may obtain a basic licence for their washing technology. If the supplier uses an external chemicals supplier, it must be stated on the licence which chemicals supplier the basic licence holder has a contract with, and which chemicals are tailored to the treatment technology and wash installation, and thus covered by the basic licence. When applying for a basic licence, the applicant must refer to a physical installation where the initial sampling has been conducted. The installation where the initial sampling took place must also be shown on the licence.

A basic licence may only be marketed with the Nordic Swan Ecolabel logo to potential purchasers of wash installations, and not users of wash installations.

A basic licence holder must meet all the requirements in the criteria document, with the following exceptions:

- O25 Automatic door closure
- All point score requirements (P1, P2, P3, P4 and P5), but must still report how many points are achieved in terms of water consumption (O7) and chemicals (O8).
- O27 Emptying system for toilets
- O28 Special vehicles

The chemical requirements in O9-O24 must be met and 30% of car care products that the basic licence holder uses must be ecolabelled.

The licence holder always retains responsibility for ensuring that the transport wash installation is operated in agreement with the Nordic Ecolabelling criteria. Licences are issued to each individual wash installation. If a chain/group has several wash installations, a licence will be awarded to each wash installation, on condition that each wash installation meets the requirements.

Justification for Nordic Swan Ecolabelling

Transport wash installations affect the environment through considerable consumption of water and chemicals, and through emissions of contaminated wash water. Wash water from wash installations contains metals and organic substances that have a negative impact on the water recipients, processes and sludge quality. Water consumption is particularly large in installations that do not re-circulate water.

Emissions of metals, oil and organic substances per wash vary a great deal from installation to installation. Much of the contamination derives from the dirt that is washed off. Emissions of metals and organic substances can be significantly limited by choosing specifically adapted cleaning chemicals and tailoring the treatment technology to the washing method. This naturally assumes that the business has good procedures in place for the operation and maintenance of the wash installation.

The requirements for a Nordic Swan Ecolabelled transport wash installation stimulate the development of resource-efficient and effective wash installations without environmentally hazardous emissions to air, soil or water.

Generation and validity of the criteria

The first generation of the criteria document for Nordic Ecolabelling of vehicle wash installations was adopted by the Nordic Ecolabelling Board (NMN) in October 2000. The criteria have since been revised on one occasion.

Generation 1, adopted on 6 October 2000

The environmental requirements in the first generation focused on the physical design of the installation, as well as water consumption, choice of chemicals, emission controls, waste management and procedures for operation and maintenance.

Generation 2, adopted on 14 June 2007

In the second generation, the focus was on making the criteria document more user-friendly for licence holders. Point score requirements were introduced and new requirements (point score requirements) were set for energy and emissions of DEHP, VOC and COD. Emission requirements for the metals Pb, Ni, Cr, Cd and Cu were tightened, and point score requirements were introduced for water consumption and chemicals, in addition to the obligatory requirements.

Generation 3, adopted on 23 October 2013

The revised generation 3 was adopted by the Nordic Ecolabelling Board (NMN) on 23 October 2013.

The Nordic Market

In the Nordic region, wash installations for cars are generally linked to other businesses such as filling stations and car dealerships, but also occur as separate commercial ventures. Many people also choose to wash their car on their own driveway. The wash water then runs directly into the environment instead of being channelled into drains connected to public water treatment facilities. Nordic Ecolabelling therefore encourages consumers to wash their cars at a dedicated installation for the benefit of the environment.

Wash installations for passenger cars include both automated and manual installations (self-service installations). Passenger car wash installations are primarily run by the oil companies' filling stations, but many installations can also be found at shopping centres, for example. There are several central wash installations for large vehicles (trucks, semi-trailers, etc).

Table 1 Distribution of wash installations in the Nordic region

Type of installation	Denmark	Finland	Norway	Sweden
Automated installation for passenger cars	1320	900	835	1100
Automated installation for trucks			100	300
No. of washed vehicles (passenger cars) per year (in millions)	13	10	14	16

There are currently around 67 Nordic Swan Ecolabelled transport wash installations in the Nordic region. All the Nordic Swan Ecolabelled installations are for passenger cars, and the majority are located in Sweden and Denmark. Finland has two Nordic Swan Ecolabelled installations and Norway has none. The wide variation in uptake in the

different Nordic countries is due in part to the differing attitudes of authorities and consumers. In Norway there is little interest in investing in water treatment units for the re-circulation of water, when this is not required by the authorities. At the same time, water is not seen as a scarce resource in the same way that it is in Denmark. There has long been a focus by the Swedish authorities on re-circulating water in wash installations, and this is reflected in the attitude towards investing in water treatment units.

Several municipalities (including in Sweden and Norway) have introduced tighter emission rules than those set by the national authorities. Some municipalities in Sweden advise consumers not to wash their car at home. Nevertheless, 7 out of 10 Swedes do wash their car at home.

Nordic Swan Ecolabel licences

As of September 2013, there are 120 ecolabelled transport wash installations issued under generation 2 of the criteria, in the Nordic countries. This is an increase of 100 washing units since 2006. The licences relate exclusively to washing units for passenger cars. The distribution of the licences is as follows: Denmark (18 licences, 50 washing units), Sweden (15 licences, 15 washing units) and Finland (2 licences, 2 washing units).

Other labels

There are no other ecolabelling systems for transportwash installations in the Nordic region, but some follow ISO 14001, which is an environmental management system for all types of business.

3 About the criteria revision

Purpose of the criteria revision

The main objective of the revision is to present a proposal for revised criteria for wash installations, version 3.0, in October 2013.

The evaluation of the criteria document for the Nordic Ecolabelling of wash installations, generation 2, which was put before NMN in June 2012, highlighted a number of points that should be examined in the next revision of the criteria. These points included:

- Clear declaration of product group parameters
- Include chemical requirements in the criteria document
- Clarify requirements that have been interpreted differently
- State whether the licence must be linked to the production site or the owner
- Make certain requirements more precise
- Review procedures for taking samples
- Tighten certain requirements and adjust the points weighting
- Amend the requirements concerning manual wash installations.

About this criteria revision

The project has been run as a Nordic project.

Project Manager/Nordic Product Manager: Anne Kristine Feltman (Norway)

Project Consultants: Pehr Hård (Sweden)

Nordic Ecolabelling Product Development Manager: Karen Dahl Jensen

The criteria and background documents were also sent out for external consultation to manufacturers, licence holders, public bodies, industry organisations and stakeholders during the period March–May 2013 and were presented to the Nordic Ecolabelling Board (NMN) in October 2013.

4 Background to the requirements

Washing of transport affects the environment primarily through consumption of water and chemicals, and through emissions of contaminated wash water. Wash water from wash installations contains metals and organic substances that have a negative impact on the water recipients and disrupt processes and sludge quality in municipal water treatment plants. Large quantities of water are used when a transport is being washed, particularly in installations that do not re-circulate water.

Emissions of metals and organic substances per wash vary a great deal from installation to installation. Much of the contamination derives from the dirt that is washed off the transport. Measures to reduce emissions of heavy metals and oil include choosing the right cleaning chemicals and adapting the water treatment technology to the washing method. It is also important to have the right operational and maintenance procedures in place. Parts of the industry have been quite resistant to installing water treatment and re-circulation units. This is particularly true in Norway. In Finland, Sweden and Denmark, there is broader acceptance of the use of water treatment units to reduce emissions and water consumption.

The requirements for a Nordic Swan Ecolabelled transport wash installation stimulate the development of resource-efficient and effective wash installations without environmentally hazardous emissions to air, soil or water. The key focus areas have been:

Table 2 Focus areas Nordic Swan Ecolabelled transport wash installations.

Focus area	Requirement
Physical design of the installation	Oil separator and water treatment technology adapted to the washing method and washing volume. Overview of installation's water and drainage system, location of equipment and machinery, sludge and oil separator, sampling point, water meter and connection points.
Water consumption	Absolute requirement for water consumption per wash, which requires that water is re-circulated. Manual wash installations must not use re-circulated water
Chemicals handling	Requirements concerning type of chemicals
Emission controls	Emissions from the wash installation
Waste handling	Waste from oil and sludge separators
Operation and maintenance	Automatic door closure In-house checks and initial sampling Annual reporting Procedures and instructions Training Storage of chemicals

In order to assess which requirements should be set for Nordic Swan Ecolabelled wash installations, a simplified LCA, known as a MECO analysis, was conducted in conjunction with the evaluation of the criteria in 2012. The MECO analysis examined the environmental impact of wash installations over five 'phases':

1. Materials/ingredient production (mainly manufacture of chemical ingredients, materials for the actual wash installation and any packaging materials)

2. Manufacture (manufacture of the actual wash installation, including the water treatment unit, ingredients for car care products and water treatment chemicals)
3. Use phase (the actual wash installation and its operation)
4. Waste/disposal (used chemicals and packaging, sludge disposal, waste water)
5. Transport (across the entire life cycle)

Within each of these five phases, the assessment focused on “Material use/consumption”, “Energy use”, “Chemical use” and finally “Other considerations”. The MECO analysis is a good tool for avoiding setting requirements that simply shift environmental problems from one phase to another.

The MECO matrix helps us to assess the issue of relevance, in terms of whether there is a health and/or environmental impact associated with materials, energy and chemicals in the different life cycle phases of a wash installation. The next stage is to assess the potential for reducing health and/or environmental effects in the wash installation’s life cycle, before the final judgement is made on whether ecolabelling offers the steerability required to realise the potential for environmental improvement.

In order to set relevant requirements that promote real environmental gains, all three parameters (RPS) must be assessed to establish the existence of Relevance, Potential and Steerability. In exceptional circumstances, it may be enough to have Relevance and Potential or Steerability, if we believe that licence applicants/manufacturers seeking the Nordic Swan Ecolabel may create/contribute towards the required parameter that is lacking in an RPS through increased demand and competition.

The MECO analysis during the evaluation showed that in the case of wash installations, the environmental impact is particularly significant in the use phase and waste phase, but it also indicated an applicable RPS. The table below shows the parameters that contribute an environmental impact across the whole life cycle of the wash installation. The areas that were also judged to have a high RPS are marked in green in the table below.

Table 3 Assessment of life cycle and environmental impact for wash installations

	Material phase	Production phase	Use phase	Waste phase	Transport
Material	Steel, other metals, cement, sand, crude oil for plastic.	Materials for building the installation, machinery and water treatment unit.	Car wash, transporter, conveyor, brushes.	Adapted water treatment equipment. Sludge disposal. Waste handling.	
Energy	Energy to produce metals, cement and other raw materials.	Construction energy. Energy to produce washing and water treatment chemicals.	Fans, brush machine, pumps, heating of enclosed wash installation and water. Power management.	Energy for pumps and water treatment unit.	
Chemicals	For mining and extraction of raw materials.	Production of units and chemical building materials.	Water consumption. Washing chemicals and water treatment chemicals.	Chemical residues in waste water and sludge. Water treatment chemicals. Nordic Swan Ecolabelled chemicals.	
Other		Installation's design and construction.	Installations with re-circulated water, toilet emptying systems, special vehicles, chemical requirements, environmental management.	Dimensioning of water treatment equipment, emissions from the washing, waste management.	Special vehicles

Relevance, Potential and Steerability

In order to set relevant requirements that promote real environmental gains, all three parameters (RPS) must be assessed to establish the existence of Relevance, Potential and Steerability. In exceptional circumstances, it may be enough to have Relevance and Potential or Steerability, if we believe that licence applicants/manufacturers seeking the Nordic Swan Ecolabel may create/contribute towards the required parameter that is lacking in an RPS through increased demand and competition.

Relevance is assessed according to the environmental problems that the product group causes and the extent of such problems.

Water consumption when washing passenger cars requires up to 400-500 litres of water per washed car. Washing of buses, trucks, trains and other rail transport also affects the environment through extensive use of water. Water resources vary considerably in the Nordic region, both locally and regionally. In Denmark, water is considered a limited resource, while access to water is much greater in Finland and Norway. In a sustainable society there is nevertheless an interest in limiting consumption of most resources, including water, not least considering continuing population growth and increasing demand for a water supply. In addition, treating water consumes energy.

Energy consumption is a relevant parameter in much of the life cycle of a wash installation. Extracting materials for the installations themselves (extraction of iron and other metals, cement and other raw materials) also consumes energy, as does building the installation, and manufacturing the washing and water treatment chemicals, in addition to operating the facilities (fans, brush machines, pumps, heating the enclosed wash

installation and the water, and the water treatment system). In addition, water production and treatment of the waste water require energy. Figures from DANVA (the Danish water and waste water association) show that water production requires energy consumption of around 0.4 kWh/m³, while the energy consumed in treating the waste water (to drinking water standard) is around 1.06 kWh/m³.

Chemicals are used in producing materials and machines, and in building the installations (e.g. chemical building products). In the use phase, i.e. operating the installation, large quantities of washing chemicals and other chemicals are used to wash and operate the water treatment units. Residues of the chemicals end up in sludge and waste water.

Potential is assessed based on the possible environmental gains within the product group and for each area in the criteria where requirements are set.

The amount of water consumed in washing varies depending on whether the transport is washed manually and the type of equipment contained in the enclosed wash installation. Consumption of fresh water per washed car is considerably lower in installations where the water is recirculated than in installations where the water is not recirculated.

Energy consumption in connection with the extraction of raw materials and the production of materials for the installations, and likewise for the construction of the installation and the production of chemicals, is considered to be significant, although there is no data available on the magnitude of this energy consumption, particularly in relation to each wash. During the use phase there are various types of washing machine and water treatment unit that require energy, including for the brushes, fans, pumps, machinery and so on. There is little information about the energy consumption of the different fixtures and fittings, but Nordic Ecolabelling believes it is an area that should be examined in future work on the ecolabelling of wash installations.

The process of treating the wash water in a wash installation is less thorough than the treatment of water in a municipal water treatment facility, meaning that the water is not as clean, but clean enough to be used in a wash installation. The process also requires less energy. Recirculating wash water in wash installations leads to less waste water, which again leads to lower energy consumption.

Choosing chemicals which contain only limited amounts of chemicals that are harmful to health and environment will reduce the quantities of harmful substances in sludge and waste water.

Steerability is assessed based on the scope to set requirements concerning the relevant environmental parameters that show potential for improvement.

It is possible for Nordic Ecolabelling and licensees to steer in the direction of lower water consumption by encouraging wash installations where the water is recirculated. The water consumption requirement for Nordic Swan Ecolabelled transport wash installations has therefore been set so low that installations must have installed a solution that recirculates water in order to fulfil the requirement. In addition, installations are rewarded if they have even lower water consumption.

When it comes to the energy consumed in raw material extraction and the production of materials and machinery, steerability is considered to be negligible, making requirements in this area inappropriate for the wash installation criteria. However, steerability does

exist in relation to reducing energy consumption in the actual operation of a wash installation. This can be achieved by introducing more requirements for measures that reduce energy consumption, such as automatic door closure and light control.

It is possible for licensees with Nordic Swan Ecolabelled transport wash installations to set requirements for chemical suppliers, thus ensuring that only the least environmentally harmful wash chemicals are used in the wash installation. Nordic Ecolabelling therefore sees some steerability in setting requirements relating to the chemicals used in the wash installations. There are also a number of Nordic Swan Ecolabelled chemicals that are suitable for use in Nordic Swan Ecolabelled transport wash installations.

The RPS analysis as it relates to the criteria for transport wash installations.

It is clear that the areas where the RPS is high match in well with the areas where Nordic Ecolabelling sets requirements for Nordic Swan Ecolabelled transport wash installations.

Table 4 MECO analysis in relation to the requirements for Nordic Swan Ecolabelled transport wash installations

	Material phase	Production phase	Use phase	Waste phase	Transport
Material				O1	
Energy			O10, P2, P3		
Chemicals			O7, O8, O9	O8, O10	
Other		O1 + O2	Environmental management requirements O3, O4, O27, O28	O1, O2, O6, O26	O28

Both the material phase and the production phase have an environmental impact in terms of extracting raw materials and the energy required to extract and produce materials for the wash installations and the chemicals used during operation. However, the steerability is judged to be so low that setting requirements for these phases is currently not a priority. Energy consumption during the use phase is a relevant parameter in the life cycle of a wash installation, and is an area in which Nordic Ecolabelling wishes to consider setting more detailed requirements in future revisions. At the moment, the only requirement is for automatic door closure. In addition, points are given for energy reporting and power management.

The criteria document for the Nordic Ecolabelling of transport wash installations focuses on the environmental impact of the washing.

Technical solutions

To achieve a good wash result with only a small environmental impact, it is important that the choice of chemicals, dosing and application time are tailored to each other, but also to factors such as dirt and temperature.

High-pressure washers without brushes normally require a rather larger dose of washing chemicals and more water than machines that wash using brushes. The correct chemical dosage requires that the nozzles on the washing unit are reliable for use with the cleaning chemicals, for example.

The water treatment technology must be dimensioned according to the washing method and the washing frequency at the particular site. Written instructions must be in place on how operating conditions are optimised in different circumstances.

Much of the contamination from wash installations derives from the dirt that is washed off. Measures to reduce emissions of heavy metals and oil include choosing the right cleaning chemicals and adapting the water treatment technology to the washing method.

There are various types of technology for treating waste water from wash installations. All the equipment manages to cleanse the water of impurities to a certain degree. Automated wash installations, which use relatively large quantities of water, must be fitted with a water treatment solution that re-circulates the water in order for the emissions to comply with the requirements set by Nordic Ecolabelling.

The most commonly used water treatment solutions are:

- **Gravimetric oil and sludge separators**

The separation of oil and particles is based on the fact that the oil rises to the surface of the water and the particles drop down to form a sediment. The technology relies on the waste water spending a certain amount of time in the sludge and oil separator so that separation can take place. The technique only works with waste water that contains pure water and pure oil, and is not sufficient to separate out oil emulsions formed when washing chemicals are used. None of the installations in Denmark with biological treatment units have oil separators, while installations in Sweden and Norway are legally required to have oil separators.

The cleansing effect can be boosted using lamellae (which increase the sedimentation surface) or **coalescing filters**. In the latter case, the waste water passes through a filter where small emulsified oil droplets are captured and form larger droplets that rise to the surface and are skimmed off. If the oil droplets are extremely small (as is the case in a high-pressure wash, for example) or strongly emulsified, the oil will pass through the filter and the filter will have no effect.

Another method of achieving sedimentation is to pass the water through a **hydrocyclone**. This forces the water into a rotating motion and particles heavier than water are separated out by catching on the walls of the cyclone and dropping down to the bottom, where they are removed.

- **Chemical flocculation**

To make gravimetric separation more effective, the water is treated with chemical flocculants. This technique is used to split emulsions (microscopic oil droplets floating in water with the help of surfactants), suspensions (particles > 0.1 nm) and dispersions (particles > 0.01 nm).

Dirt particles are usually electrically charged and therefore repel each other. A flocculant neutralises these charges and the particles form flocs that sink to the bottom (sedimentation) or float up to the surface (flotation) depending on the type of flocculants used.

The flocculation process is pH-dependent, with flocculants normally working best within a pH range of 6–8, and sedimenting agents at a pH of 7–9.5. In installations where the pH of the waste water varies or lies outside the ideal

intervals, pH regulating chemicals must therefore be added to the waste water.

To improve flotation, small bubbles of air are blown into the water (micro-flotation) to encourage the flocs to stick to the bubbles and rise to the surface. The flotation method generates less sludge, but at the same time is more sensitive (narrower pH range) than the sedimentation method. It is also possible to create electrically charged gas bubbles using electrodes (electroflotation). This method can be used to remove wax and drying agents (cations) from the water.

Filtration normally uses a sand filter or a membrane. With a sand filter, the waste water is filtered through fine sand, which traps the dirt particles. The filter is cleaned through regular washing.

Membrane filtration is usually referred to according to the size of the pores in the filter:

- Microfiltration (approx. 1–0.1 μm)
- Ultrafiltration (approx. 0.3–0.02 μm)
- Nanofiltration (approx. 0.05–0.005 μm)
- Reverse osmosis (approx. 0.007–0.001 μm)

- **Biological treatment**

This technique is based on microbiological (bacterial) digestion of organic matter, for example surfactants and oil residues. The bacteria require good access to oxygen for the best effect. If the oxygen is lacking (anaerobic conditions), anaerobic bacteria begin to grow instead. Anaerobic bacteria break down organic matter and at the same time form metabolites that can be both toxic and malodorous, for example hydrogen sulphide H_2S . This is usually combated by continually circulating the water.

One benefit of biological water treatment is that it does not require any chemical additives and does not generate any major quantities of waste. The disadvantage is that the bacteria need a certain amount of time to adapt to the type of waste water that is to be treated. The bacteria are also highly sensitive to disruption, for example from toxic substances.

- **Antibacterial treatment**

In water that is re-circulated, organic matter will be broken down by micro-organisms over time. Under anaerobic conditions, an unpleasant odour may develop. To eliminate such odours, the water is treated in various ways, for example using ozone (O_3). Ozone is formed with the help of electricity and air, and has an antibacterial effect, while also introducing oxygen into the water. Ozone is added in gaseous form in a quantity of around 2–6 g/h.

The water can also be treated with hydrogen peroxide (H_2O_2), sodium hypochlorite (NaClO) or UV radiation. UV radiation has a limited effect, since the water contains particles that shield the microorganisms from the UV rays.

Sodium hypochlorite in combination with organic matter in the water can cause unwanted organochlorides.

O1 Wash installation and water treatment equipment/system

Both automated and manual pre-programmed wash installations may be Nordic Swan Ecolabelled. There are many different solutions for treating emissions from wash installations, such as chemical flocculation, biological treatment and antibacterial treatment. See also the section on technical solutions above.

Nordic Ecolabelling does not intend to dictate the type of water treatment equipment a wash installation must use to meet emission requirements in the criteria, but does consider a system for sludge and oil separation with sand filter to be a minimum requirement for the operation of a wash installation, since this is usually a national regulatory requirement. It is up to the owner of the wash installation to decide which water treatment solution to use over and above a sludge and oil separator with sand filter.

It is important for both Nordic Ecolabelling and the wash installation to have an overview of the installation and its operation, not least in order to know where to locate the sampling points for water analysis. Nordic Ecolabelling therefore requires a description of the installation that is to be Nordic Swan Ecolabelled.

To achieve a good wash result with only a small environmental impact, it is important that the choice of chemicals, dosing and application time are tailored to each other, but also to factors such as dirt and temperature. High-pressure washers without brushes normally require a rather larger dose of washing chemicals and more water than machines that wash using brushes. There is thus no requirement concerning dosing of washing chemicals, since Nordic Ecolabelling considers requirements for chemicals and emissions to be more important. In addition, wash installations have automatically controlled dosing, and are set to dose the optimum quantity of washing chemical for the washing method in question. Nordic Ecolabelling thus sees little steerability in setting dosing requirements.

The water treatment technology must be dimensioned according to the washing method and the washing frequency at the particular site, in order to treat the waste water to a satisfactory level in terms of oil and heavy metal content.

Proposed requirement:

There is to be a brief description of the transport wash installation, which includes:

- type of wash installation (manual self-service installations and/or automated installation, dimensioned for cars, buses, trucks, trains and other rail transport)
- washing method
- type of treatment unit (treatment technique)
- no. of transport that installation is designed for per day

For buses and trucks, water consumption and emissions are calculated in relation to the vehicle's length in metres. For trains and other rail transport, water consumption and emissions are calculated in relation to 12 metres of train. See O6.

- no. of transport washed per day

The waste water from the wash installation, (also in the case of overflow) is to be cleansed by a water treatment solution tailored to the washing method and washing volume. A sludge and oil separator with sand filter is to be included in the water treatment solution, with the exception of biological treatment units where an oil separator is not required.

- Declaration from the suppliers of the water treatment solution and the chemicals that the wash installation and the water treatment solution are tailored to the washing method and washing volume, see Appendix 1.

02 Technical description of the installation

Nordic Ecolabelling wishes to have a good overview of the wash installation and the water treatment system to ensure that the installation functions well. It is also important that the company has a good overview of the installation, the water and waste water system, and the location of the water meter and sampling points.

Oil separators and water treatment equipment must not be used to treat surface water (i.e. rainwater and meltwater from nearby roofs and ground). The water treatment equipment is to be designed for the maximum water flows used for washing the transport. A water treatment unit will therefore be unable to cope with the addition of rainwater and melting snow from the surrounding area. The channelling of water from these sources can also cause contaminants to be flushed into the drainage system.

Sites with some other activity (such as a workshop) may channel their waste water to the water treatment unit if the supplier of the treatment system and the authorities approve this.

Sampling point

In order to check that emissions do not exceed permitted levels, it must be easy to take representative samples from the waste water. If taking samples is difficult, there is a major risk that the checks will be lacking/insufficient.

The sampling points must be located such that the samples are taken from the waste water that is channelled away from the wash installation, i.e. after the water treatment system.

The sampling points must be easily accessible and the location must be clearly marked on a plan of the wash installation.

Water meter

A water meter is to be located so that it measures all fresh water consumption in the wash installation. Water used for cleaning the installation must also be measured. If there is more than one washing unit in the same installation, each unit must have a separate water meter and a separate transport counter.

For the water supply, any re-circulation of water and the waste water from the installation, it is to be made clear where the water supply comes in, where it is re-circulated and where it is channelled away from the installation.

Proposed requirement:

The oil separator and water treatment solution tailored to the wash installation must not be used to treat surface water. The water treatment system may be used to treat waste water from a part of the site that has a use other than the washing of transport,

provided this is approved by the supplier of the water treatment system. Toilets must not be connected to the water treatment system due to the risk of spreading infections.

A sketch of the wash installation is to be provided, showing the location of:

- the wash installation's water and drainage systems
- washing machines
- water treatment equipment
- sludge and oil separator, overflow
- sampling point, which must be easily accessible
- water meter connected to the wash installation

- Sketch of the wash installation showing the above points and description of the drainage system, in accordance with the requirement. If the water treatment system will be used to treat waste water from elsewhere on the site, a declaration must be made by the supplier to the effect that the treatment solution is designed to treat waste water from parts of the site with a use other than the washing of transport.

03 Installations with re-circulated water

Wash installations that re-circulate water are more vulnerable to the occurrence of anaerobic conditions in the system and thus the growth of algae and bacteria. To avoid this, the installation must be designed to prevent such conditions from occurring. One measure, for example, may be to pump air into the water during the water treatment process.

Proposed requirement:

Wash installations with re-circulated water must be designed to keep anaerobic conditions in the water to a minimum. This may be done, for example, by pumping air into the water.

- A description/statement of the measures taken to avoid anaerobic conditions in systems with re-circulated water.

04 Manual wash installations

In order to reduce any health risks, re-circulated water may not be used in manual wash installations. Water from manual wash installations may contain high concentrations of chemicals and microorganisms.

At a manual wash installation, customers wash their own cars and decide on how much of a wash to give their car. Customers can choose which wash programmes they want to use (degreasing, hot wax and/or wax polish, for example). Nordic Ecolabelling would like to see the quantity of water and chemicals used regulated, and therefore sets the requirement that the use of cleaning and care chemicals and water consumption must be time-controlled or dosage-controlled.

Wash installations for trains and other rail transport are exempt from the requirement since they are generally automated.

Proposed requirement:

Re-circulated water must not be used in manual wash installations.

In wash installations where customers wash their own cars manually, the choice and use of cleaning and care chemicals is to be controlled automatically and water consumption is to be time-controlled.

- ☒ Declaration of how chemical choice, dosing and water consumption are controlled in manual wash installations. Declaration from the supplier that re-circulated water is not used for manual washing. Appendix 1 can be used.

Water consumption and emissions

05 Initial sampling

An initial sampling is conducted to verify that the installation has technology in place that will function successfully at all times. This check must show that the installation meets the Nordic Swan Ecolabel's emission requirements over time.

Sampling must be conducted between 1 November and 30 April, since there is more dirt on the transport during this period and installations require higher doses of chemicals in order to function satisfactorily. Where new wash installations and installations that have been refurbished are awarded a licence outside the sampling period, an initial sampling must be conducted in the course of the next sampling period (1 November – 30 April). Wash installations that are due for reassessment must also conduct a new initial sampling when renewing their licence.

Wash installations that make use of a basic licence are exempted from the requirement regarding the initial sampling, since this will already have been conducted by the basic licence holder.

Sampling is to be conducted once at least 10% of the annual transport figure have been washed and after the sludge and oil separator has been pumped out. The results from this check will form the basis for a Nordic Swan Ecolabel licence application. The above criteria mean that once the sludge and oil separator has been emptied, at least 10% of the annual transport figure must have been washed before the sampling takes place. For example, if a wash installation washes 5,000 transport a year, at least 10% (500 transport) must have been washed since the most recent emptying and before the sampling is conducted.

This is to ensure that emission measurements are taken from the water treatment unit after it has been in operation for a while. The resulting emission values will thus prove whether the water treatment unit is working properly.

Emissions

Water samples are taken with automatic and flow proportional equipment or manually from running waste water. Two waste water samples are to be taken within the period 1 November – 30 April, and there must be a minimum of one month between the two samples.

Licence applicants who use technology from a supplier with a basic licence do not need to conduct the initial sampling, since it has already been documented that the technology works to a satisfactory degree.

Water consumption

Water consumption is to be measured for seven days during the period 1 November – 30 April.

In the case of initial sampling, the water consumption must be measured over the same period as the water analysis sampling.

Licence applicants who use technology from a supplier with a basic licence do not need to conduct the initial sampling measurement, since the water consumption has already been documented.

Proposed requirement:

When applying for the Nordic Swan Ecolabel, sampling is to be conducted at the installation to show that the emission requirements in O6 and the water consumption requirements in O7 are fulfilled.

For new wash installations that are awarded a licence outside the sampling period, an initial sampling must be conducted in the course of the next sampling period (1 November – 30 April).

Sampling period:

The sampling is to be conducted during the period 1 November – 30 April, and once at least 10% of the annual transport figure have been washed after the sludge and oil separator has been pumped out.

Sampling for water analysis:

The results of the sampling will form the basis for a Nordic Swan Ecolabel licence application and must show compliance with the emission requirements in O6.

In the event of a new application, water samples are to be taken using the automatic flow proportional method or manual random sampling. Two waste water samples are to be taken within the period 1 November – 30 April, and there must be a minimum of one month between the two samples.

Licence applicants who use technology for which the total supplier already has a Nordic Swan Ecolabel licence (basic licence) do not need to conduct the initial sampling, since it has already been documented that the technology works to a satisfactory degree.

For basic licence holders and licensees who do not have an agreement with a basic licence holder, an annual self-assessment is to be conducted to calculate emissions under the terms of the requirements for self-assessment in O29.

Water consumption:

Water consumption is to be measured for seven days during the period 1 November – 30 April. In the case of initial sampling, the water consumption must be measured over the same period as the water analysis sampling.

Reassessment:

Wash installations that are due for reassessment must conduct a new initial sampling when renewing their licence. This applies to installations with a basic licence and installations that have a licence of their own that is not associated with a basic licence.

Wash installations that make use of a basic licence are exempted from the requirement regarding the initial sampling, including during reassessments, since this will already have been conducted by the basic licence holder.

☒ Description of compliance with the requirement, see Appendix 2 and 6.

O6 Emissions from the wash installation

The most common contaminants from wash installations for cars are lead, chromium, nickel, cadmium and zinc, in addition to mineral oil. Climate and use of road salting also affect the dirt levels. Norway, Finland and Sweden also use seasonal winter tyres, which cause increased wear on the roads and asphalt deposits on the transport.

Flecks of asphalt are often difficult to remove, and therefore micro-emulsions are considered necessary in the washing process. Winter tyres are not used to the same degree in Denmark, which means that water-based degreasing agents are used almost exclusively for washing vehicles.

In the previous generations of the criteria for wash installations, stricter requirements have been set for the Skåne region than for the rest of Sweden (putting the requirements on a par with those in Denmark). The Swedish industry in particular has been critical about having different requirements in Sweden, and having discussed this issue exhaustively, Nordic Ecolabelling has decided that wash installations in the Skåne region shall have to fulfil the same requirements as the rest of Sweden.

The Swedish Transport Administration analysed the slush that builds up along salted roads and found that the slush contained asphalt residues (46%), sand and grit (40%), rubber residues (7%) and salt (2%). Asphalt comprises the petroleum derivative bitumen, which itself contains low levels of metals (for example <20 ppm zinc, <35 ppm chromium, 15-100 ppm nickel) and polycyclic aromatic hydrocarbons (<100 ppm PAH). Tyre rubber may also contain zinc and PAH (polycyclic aromatic hydrocarbons).

Waste water from wash installations contains substances that may disrupt the water treatment process in municipal treatment plants and lower the sludge quality. Some substances may also have a negative impact on the ecosystems of the water recipient. The most undesirable substances are the metals cadmium (Cd), zinc (Zn), lead (Pb), nickel (Ni) and copper (Cu), as well as organic substances such as unsaturated aliphatic hydrocarbons (oil).

These contaminants may come from the dirt washed off, which comprises particles from tyre wear, material from other transport and the roads, plus residues of fuel and exhaust gases. Added to this is the material in the wash installation itself, with galvanised materials and brass parts for example capable of releasing metals (zinc). It is important that a Nordic Swan Ecolabelled wash installation's water treatment unit captures as many of these undesirable substances as possible before the waste water is sent on to the municipal treatment plant.

Experience from Nordic Swan Ecolabelled transport wash installations indicates that the requirement levels for emissions are set at the correct level, but that there is scope to tighten some of the requirement levels. Tighter emission requirements have therefore been proposed in version 3 for \sum Pb (lead), Ni (nickel), Cr (chromium) (from 7 mg/car to 5 mg/car) and cadmium (Cd) (from 0.1 mg/car to 0.05 mg/car). Miljösamverkan Skåne, an environmental partnership in southern Sweden, has developed advisory material¹ for the transport industry, including wash installations. The material includes guidelines and limits for emissions for wash installations. The emission requirements for \sum Pb, Ni and Cr are the same as in the requirements for Nordic Swan Ecolabelling transport wash installations. The Nordic Swan Ecolabel has stricter emission requirements for cadmium (Cd) and oil, and has added emission requirements (version 3) for copper (Cu).

Water company Stockholm Vatten AB and wastewater association Käppalaförbundet have drawn up guidelines to reduce emissions of oil and metals from wash installations for trains and other rail transport (train washes) into the waste water network and on to

¹ Advisory material from Miljösamverkan Skåne, Fordonsbranschen – åkerier, bilverkstäder och fordonstvättar (2013)

the water recipient. Nordic Ecolabelling's emission requirements are the same as these guidelines. Trains and other rail transport were first included in the criteria during the validity period of generation 3. Nordic Ecolabelling intends to tighten the emission requirements in the next revision.

The brake pads on trains include a binder that may contain antimony. In addition to requirements concerning Σ Pb+Ni+Cr, Cd, Zn, Cu and oil, Nordic Ecolabelling therefore also sets a requirement concerning emissions of antimony from wash installations for trains and other rail transport.

Sampling is to take place at a point after the waste water has passed through the water treatment equipment but before the connection to the municipal waste water network/water recipient, where the collected waste water from the wash installation passes. Water turbulence is important at the sampling point, to avoid samples from layered water.

The sampling is to be conducted during the period 1 November – 30 April, and once at least 10% of the annual transport figure has been washed after the sludge and oil separator has been pumped out.

Proposed requirement:

Emissions to the drainage system from automated and manual wash installations must not exceed the values specified in the table below.

The sampling is to be conducted during the period 1 November – 30 April, and once at least 10% of the annual transport figure have been washed after the sludge and oil separator has been pumped out.

Water samples are to be taken using the automatic flow proportional method or manual random sampling. Two waste water samples are to be taken within the period 1 November – 30 April, and there must be a minimum of one month between the two samples.

The emissions must be calculated as monthly average values. For information on water sampling, see Appendix 6 "Explanations, analysis and control".

Table O6 Emissions

	Emission requirements for passenger car washes		Emission requirements for bus and truck washes		Emission requirements for trains and other rail transport
	Finland, Iceland, Norway and Sweden	Denmark	Finland, Iceland, Norway and Sweden	Denmark	Denmark, Finland, Iceland, Norway and Sweden
Σ Pb, Ni, Cr	5 mg/car	5 mg/car	15 mg/vu	15 mg/vu	5 mg/12 metres of train
Cd	0.05 mg/car	0.025 mg/car	0.15 mg/vu	0.075 mg/vu	0,1 mg/12 metres of train
Zn	50 mg/car	50 mg/car	150 mg/vu	150 mg/vu	50 mg/12 metres of train
Cu	10 mg/car	10 mg/car	30 mg/vu	30 mg/vu	30 mg/12 metres of train
Oil	1.5 g/car	0.75 g/car	4.5 g/vu	2.25 g/vu	2,5 g/12 metres of train
Sb	-	-	-	-	2 mg/12 metres of train

One vehicle unit (vu) is a vehicle, truck or bus, with a length of 12 metres.

- 0.5 vu is a van or minibus, for instance, with a length of about 6 metres.

- 1.5 vu is, for instance, an articulated bus or a semi-trailer rig with a length of about 18 metres.

- 2 vu is a truck plus trailer with a length of about 24 metres.

- Test results. The water analysis shall be carried out by a competent laboratory according to test methods specified in Appendix 6. The sampling must take place at a point after the water treatment equipment but before the connection to the municipal waste water network.

P1 Emissions of phthalates

Phthalates are used chiefly as plasticisers in plastic, and can be found in many products that we use on a daily basis. The phthalates can be found in plastic, primarily PVC (for example construction materials, flooring and roofing, cables)².

Many phthalate compounds have undesirable effects on health and the environment³. Some phthalates are inscribed on the EU's priority list of substances that should be investigated more closely for endocrine disruptive effects. Di-2-ethylhexyl phthalate (DEHP), dibutyl phthalate (DBP) and butyl benzyl phthalate (BBP) are classified as toxic and specifically toxic to reproduction. They may damage fertility and the unborn child. Diisobutyl phthalate (DIBP) is on the EU's Candidate List of Substances of Very High Concern⁴. Di-2-ethylhexyl phthalate (DEHP) has also been recorded in waste water from wash installations, and is suspected to derive from soft PVC materials on the underside of the transport. Denmark in particular has been monitoring di-2-ethylhexyl phthalate emissions from wash installations.

In generation 2 of the criteria, measuring DEHP was introduced as a point score requirement in the hope that Nordic Ecolabelling would gain more knowledge about DEHP levels in waste water. It would also be useful to have more knowledge about the phthalates DBP, BBP and DIBP in waste water. Nordic Ecolabelling has extremely limited data in this area. If there is to be any meaning in setting absolute requirements for phthalate measurement, measurements should be taken before and after the water treatment unit, in order to see the effect of the treatment. Biological water treatment units can only conduct measurements after cleaning due to the design of the unit. If the water treatment methods are not effective enough in capturing phthalates, demanding such measurements will have little effect.

Proposed requirement:

Wash installations that take measurements of the phthalates di-2-ethylhexyl phthalate (DEHP), dibutyl phthalate (DBP), butyl benzyl phthalate (BBP) and diisobutyl phthalate (DIBP) are awarded 1 point. Water samples must be taken both before and after the water treatment unit in order to measure the phthalate content before and after treatment with the exception for biological treatment where water samples are taken after treatment.

- Test results using the GC-MS method (Gas Chromatography-Mass Spectrometry) with detection limit ≤ 0.5 micrograms/litre.

² www.erdetfarlig.no

³ <http://www.miljostatus.no/Tema/Kjemikalier/Noen-farlige-kjemikalier/ftalater/>

⁴ [http://echa.europa.eu/web/guest/candidate-list-table?p_p_id=substancetypelist_WAR_substanceportlet&p_p_lifecycle=0&p_p_state=normal&p_p_mode=view&p_p_col_id=column-](http://echa.europa.eu/web/guest/candidate-list-table?p_p_id=substancetypelist_WAR_substanceportlet&p_p_lifecycle=0&p_p_state=normal&p_p_mode=view&p_p_col_id=column-1&p_p_col_pos=2&p_p_col_count=4&_substancetypelist_WAR_substanceportlet_keywords=&_substancetypelist_WAR_substanceportlet_advancedSearch=false&_substancetypelist_WAR_substanceportlet_andOperator=true&_substancetypelist_WAR_substanceportlet_orderByCol=inclusiondate&_substancetypelist_WAR_substanceportlet_orderByType=desc&_substancetypelist_WAR_substanceportlet_delta=75)

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VOC and COD

In generation 2 of the criteria for wash installations, points were awarded for measuring VOC and COD. Few wash installations carried out these measurements and there is little basis for setting an absolute requirement regarding VOC. VOC levels are also controlled through choice of chemicals.

Emissions of organic substances from wash installations, in the form of BOD and COD, are affected by the washing chemicals chosen and how these are diluted in the solution used, as well as the water treatment technology.

Raised levels of organic matter lead, amongst other things, to increased oxygen consumption during degradation in municipal water treatment plants or in the water recipient. Alkaline degreasers generally cause a lower environmental impact than solvent-based degreasers. Research conducted by the Swedish Petroleum & Biofuel Institute (SPBI) in 2002/2003 shows a generally low reduction in BOD7 and CODCr from commonly used water treatment techniques. The degradability of the organic substances in the waste water from wash installations, expressed as BOD7/CODCr, has improved in step with the development of environmentally aware washing chemicals.

The project team has therefore chosen to remove the point score requirement for COD and VOC measurements, as this area is being indirectly steered by the choice of chemicals.

07 Water consumption

There is a great deal of variation in water consumption across the Nordic countries. In Denmark, water is considered a scarce resource, which means there is a strong commitment to reducing water consumption. In Sweden and Finland, there is less of a focus on reducing water consumption, while in Norway there is very little focus on this issue. These differing attitudes are also reflected in the water treatment technology used in the wash installations. In Norway, there is little willingness in the industry to invest in water treatment solutions where the water is re-circulated, since the investment costs are considerable compared with the cost of higher water consumption. In Norway, the water treatment solution is generally only a sludge and oil separator, as required by the environmental authorities. In the rest of the Nordic region, particularly Denmark and Sweden, it is common to have water treatment solutions where the water is treated and re-circulated.

Different washing methods involve very different water consumption. High-pressure washing uses as much as 300 litres of water to wash one car. If the installation does not re-circulate water, this represents considerable consumption of fresh water. If the installation does re-circulate the water, fresh water consumption comes in at around 60-80 litres.

Type of installation	Water consumption per washed car (litres)*
- High-pressure wash with no water re-circulation	230-280
- High-pressure wash with water re-circulation	60-80
- Brush wash with no water re-circulation	150-250
- Brush wash with water re-circulation	80-100
- Attended car wash with no water re-circulation	200-300
- Attended car wash with water re-circulation	60-100
- Self-service car wash	50-75
- Req. for Nordic Swan Ecolabel (cars)	90 (70 in Denmark)

** Fresh water consumption per washed car*

Normal water consumption when washing passenger cars requires up to 500 litres of water per washed car. This consumption can be significantly reduced by installing water treatment solutions where the water can be re-circulated. The requirement for no more than 90 litres of water per washed car (70 litres in Denmark) was based on an assessment by the Swedish Environmental Protection Agency, which would like to see a re-circulation level of 80%. This could give a maximum amount of water sent to the drainage system per washed car of around 50 litres. This limit was considered too stringent in relation to normal water consumption. In order to take account of market opinion and of the water used to dilute concentrated products, the level was set at 90 litres per washed car. The Swedish Environmental Protection Agency no longer requires 80% of the water in wash installations to be re-circulated, but wishes to see technical advances in which re-circulation reliably leads to reduced emissions.

At wash installations for buses and trucks, it is generally the case that fresh water is only used for brush washes and re-circulated water for undercarriage cleaning for high-pressure washers. This tends to give a consumption figure of 150-250 litres per 12 metres (1 vehicle unit).

If fresh water is also used for high-pressure washers, water consumption rises to around 1100 litres per wash. There are wide variations in water consumption, and it is possible for Nordic Ecolabelling to make a difference by requiring reduced water consumption.

Treatment of waste water is a key factor in controlling emissions of metals and oil from wash installations.

For the automated wash installations, the requirement concerning water consumption per wash means that the water must be re-circulated in order to maintain the water level in the washing machine that is needed to get the transport clean.

Water used to fill up the system after emptying can be excluded from the calculation of water consumed, on condition that no water escapes during filling and that the installation can prove when the system has been emptied (for example via a receipt or similar document).

Continual measurement of emissions is not practically viable. Water consumption per car represents a goal that emission values will not exceed the set limits and that licensees cannot dilute their way out of emission problems through higher water consumption.

Climatic differences in the Nordic region lead to different washing processes. In Finland, Norway and the majority of Sweden, the transport are dirtier during the winter (due to the use of winter tyres) and the climate requires the use of salt on the roads, which then accumulates in the water systems of the wash installations. Higher chemical consumption and greater quantities of salt require larger water treatment units and slightly greater water consumption to keep the re-circulated water at a satisfactory level of quality (applies both to biological and chemical water treatment units).⁵

The requirement concerning water consumption is therefore different for Denmark than for the rest of the Nordic region. Nordic Ecolabelling has received some criticism concerning the water consumption requirements, which have been given a cool reception

⁵ Ulf Nielsen, DHI, "Input til justering/ændringer af kriterier" ULN/2004-10-27 (NMN document December 2004)

particularly in Finland and Norway, where water is not seen as limited natural resource. Nordic Ecolabelling plans to conduct a comparative life cycle analysis of wash installations in Denmark and Finland in order to gain a greater understanding of the environmental performance of different installations. In this context, it is natural also to consider water consumption.

The requirement concerning water consumption is therefore different for Denmark and the southern Swedish region of Skåne than for the rest of the Nordic region.

Experience from the Nordic Swan Ecolabelled transport wash installations is that water consumption varies relatively widely across installations with similar conditions in terms of chemicals and equipment. Water consumption at the Swedish installations is very close to today's requirements. There is greater variation in Denmark, but the installations generally lie well within the limit. The water consumption requirements have not been changed in this version. Experience from the Nordic Swan Ecolabelled installations also shows that their procedures for operation and maintenance, and the analysis laboratories' procedures for sampling, also affect the emission values.

Requirements have been set for sampling points and sampling periods.

Water consumption is calculated as the number of litres of fresh water consumed per wash, calculated as an annual average. The figure for fresh water consumption is shown on water meters connected to the wash installation.

The water consumption in manual wash installations may, for example, be controlled by having water consumption pre-programmed. To reduce the risk of health hazards, re-circulated water is not to be used in installations for manual washing. Re-circulated water may contain high concentrations of chemicals and microorganisms.

During the initial sampling, the water consumption is measured over a period of 7 days. Water consumption per transport is calculated by dividing water consumption over the period of a week (7 days) by the number of transport that were washed during that same period.

The limit value for water consumption for trains and other rail transport is based on data gathered from a handful of train wash installations in the Nordic region. The requirement means that the water must be recycled. Water vapour used for de-icing should not be included in the calculation.

Proposed requirement:

Water consumption is calculated as the number of litres of fresh water consumed per wash or 12 metres of train, calculated as an annual average, and must not exceed the values in the tables below. Points will be given for water consumption that is lower than the limit values in table O7. See section 1.6 for a summary of the points.

Water consumption is to be measured and logged on a monthly basis.

For information on calculating water consumption, see Appendix 6 "Explanations, analysis and control".

Table O7 Water consumption

	Passenger cars (litres/wash)		Trucks, buses (litres/wash)		Trains and other rail transport (litres/12 metres of train)
	Automated	Manual	Automated	Manual	Automated
Finland, Iceland, Norway and Sweden	90	70	270	210	130
Denmark	70	50	210	150	130

☒ Documentation showing the calculation of water consumption, see Appendix 6. For newly built installations, water consumption must be documented in a declaration from the supplier of the wash installation.

Chemicals

08 Overview of chemicals

Chemicals are used to clean the transport and to treat the water. Chemicals used in conjunction with washing include:

- Solvent-based degreasers
- Water-based degreasers (alkaline and non-alkaline)
- Micro-emulsions
- Car shampoo and wash & wax shampoo
- Wax
- Rinsing and drying agents
- Water treatment chemicals

When washing trains and other rail transport, oxalic acid is used to remove surface rust – iron oxide that has worn away from wheels, rails and brakes. Since oxalic acid (CAS no. 6153-56-6) cannot be Nordic Swan Ecolabelled, it is excluded from the calculation of Nordic Swan Ecolabelled products. The exclusion applies to the whole product that contains oxalic acid.

A more detailed description of these can be found in the Nordic Ecolabelling criteria for car and boat care products, generation 5.

Even if chemicals used at a Nordic Swan Ecolabelled wash installation are not discharged directly into the drainage system, due to the water treatment system that all Nordic Swan Ecolabelled transport wash installations are required to have, Nordic Ecolabelling considers it important not to use chemical substances that can have long-term damaging effects. There are several reasons for this.

- Water from the wash installation will also eventually be channelled into the municipal drainage system and the water recipient, even if this will be in smaller quantities than before.
- The wash installations are generally not entirely sealed. The contaminants that are separated in the water treatment units must generally be handled by a dedicated facility as specialist/hazardous waste.

The cleaning chemicals play a crucial role in ensuring that the transport are cleaned properly. However, they must not cause emissions of substances that are harmful to health or the environment, and nor must they risk jeopardising the operation of the installation's water treatment unit or the municipal water treatment plant.

The choice of chemicals is usually determined by the kind of installation the customer has and thus which chemicals are tailored to the installation, and what agreements the supplier has with chemicals suppliers. The wash installation owner (licensee) generally does not decide which chemicals are to be used, as this is governed by agreements entered into between the equipment supplier and the chemicals supplier.

Automated wash installations almost always use a series of chemicals that are tailored to each other. This means that it is not possible to simply replace chemicals in a series with other products. Entire series are often Nordic Swan Ecolabelled. Suppliers also have series where none of the products are Nordic Swan Ecolabelled.

Nordic Ecolabelling wishes to encourage chemicals manufacturers to Nordic Swan Ecolabel their products and at the same time get the wash installations to require Nordic Swan Ecolabelled products from the chemicals suppliers and equipment suppliers.

There is therefore a requirement for basic licence holders that 30% of the cleaning chemicals to be used in a Nordic Swan Ecolabelled transport wash installation must themselves be Nordic Swan Ecolabelled. These products are controlled by Nordic Ecolabelling, which makes it easier for the operations to choose their products, and at the same time fulfil the requirements in the criteria for car care products, which are more extensive than the requirements concerning chemicals in wash installations.

It is not only important to set a requirement that a small proportion (30%) of the chemicals used in a wash installation are Nordic Swan Ecolabelled. It is also important to have a focus on environmental and health requirements for the other chemicals that are not Nordic Swan Ecolabelled. These criteria therefore also set out chemical requirements for the other chemical products. The following thus applies for non-Nordic Swan Ecolabelled car care products: Chemical products used to clean transport and wash installations must fulfil the chemical requirements O10–O23. Water treatment products cannot be Nordic Swan Ecolabelled, but must meet the requirements in O9.

In order to ensure correct operation, it is important for the wash installation and for Nordic Ecolabelling to have an overview of the chemicals used in the operation of the installation.

Proposed requirement:

Overview of all car care products and chemicals (including water treatment chemicals) that are used in the operation of the wash installation or that are included in the basic licence. The overview must include details of the manufacturer/supplier, function (degreasing, wax, etc), quantity and whether the product is Nordic Swan Ecolabelled. The licence number is to be stated for all ecolabelled products.

30% of the car care products used in the wash installation must be Nordic Ecolabelled. Products containing oxalic acid (CAS no. 6153-56-6) for use in removing surface rust from trains and other rail transport are excluded from the calculation of Nordic Swan Ecolabelled products. The proportion of Nordic Swan Ecolabelled car care products (%) is also to be calculated (as active substance, which means content without water).

Points are awarded depending on the percentage of Nordic Swan Ecolabelled products used in the operation. See section 1.6 for more about points scoring.

For chemicals that are not Nordic Swan Ecolabelled, at least 95% by volume of the total quantity of chemicals used on an annual basis (both Nordic Swan Ecolabelled and non-Nordic Swan Ecolabelled products) must meet requirements O9–O24.

Documentation for O9–O24 must be obtained from the chemicals supplier and sent to Nordic Ecolabelling.

- Overview of all chemicals, see Appendix 3, and calculation of percentage of Nordic Swan Ecolabelled products.
- For car care products and chemical products that are not Nordic Swan Ecolabelled, the supplier must submit a declaration to Nordic Ecolabelling, see Appendix 4.

O9 Water treatment chemicals – all wash installations

Experience from Nordic Swan Ecolabelled transport wash installations shows that methods for combating microorganisms, which can cause problems such as unpleasant odours, include treatment using ozone (O₃), hydrogen peroxide (H₂O₂), sodium hypochlorite or UV radiation. Sodium hypochlorite in combination with organic matter in the water can cause unwanted organochlorides, such as organochlorine metabolites. Sodium hydroxide is used for pH regulation.

Sodium hypochlorite (which is an antibacterial agent) is considered inappropriate due to the risk of forming organochlorine metabolites. Chemical products for water treatment must therefore not contain organochlorine substances or reactive chlorine compounds that may form organochlorine metabolites.

Proposed requirement:

Chemical products used for water treatment (e.g. chemical separation, pH regulation, combating microorganisms) must not contain organochlorine substances or reactive chlorine compounds that may form organochlorine metabolites.

- Declaration from the supplier of the water treatment chemicals that the products or methods do not contain organochlorine substances or reactive chlorine compounds that may form organochlorine metabolites, in accordance with appendix 11.

O10 Fragrance in chemicals in manual installations

Nordic Ecolabelling would like to see tighter requirements for chemical fragrances used in manual installations than for such chemicals in automated installations. The exceptions that have been made for fragrances apply to professional products for automated installations, primarily because exposure to fragrances and other chemicals that are hazardous to health is greater for the consumer in manual installations. Fragrances are often added to car care products to conceal malodorous surfactants in automated installations that re-circulate their water. Manual installations are required not to use re-circulated water, so the problem of odour is therefore not the same.

See also the section on fragrance for more background information.

Proposed requirement:

Chemicals used in manual installations must not contain fragrance.

- Duly completed declaration from the manufacturer, see Appendix 8.

O11 Formulation – non-ecolabelled chemicals

For the chemicals that are not Nordic Swan Ecolabelled under the criteria for car and boat care products, generation 5, the requirements regarding classification, degradability, prohibited substances and so on must be fulfilled. The chemicals manufacturer must submit sufficient documentation to enable Nordic Ecolabelling to assess whether the products meet enough of the requirements to be used in a Nordic Swan Ecolabelled wash installation.

A complete formulation specifying the content of ingredients/products, in contrast to a mixing recipe, where only products that are to be mixed are declared, must be sent to Nordic Ecolabelling. It is necessary to require a complete formulation in order to document the requirements concerning both product and constituent substances.

Proposed requirement:

At least 95% by volume of the total amount of non-ecolabelled chemicals, based on annual consumption, is to be documented with a complete formulation. There must be a safety data sheet for the product and all its constituent substances.

The formulation shall include the trade name, chemical name, quantity and CAS number for each constituent substance. The water content of the ingredients and the function of each ingredient are also to be stated.

- Complete formulation in line with the requirement and safety data sheet/product data sheet for the product and each constituent substance, in accordance with Directive 2001/58/EC.

O12 Classification of the product

The goal of Nordic Ecolabelling is for the environmental and health effects of car care products to be as little as possible. For more detailed background on the requirements set for the chemicals used in a wash installation, see the background document for the Nordic Ecolabelling of car and boat care products, generation 5.

The classification applies under the CLP Regulation (EC) No 1272/2008 as amended.

Proposed requirement:

Products that are to be used in Nordic Swan Ecolabelled transport wash installations must not have a classification, as stated in the table below, under the CLP Regulation (EC) No 1272/2008 as amended.

Table O12 Classification of the product

Classification	CLP Regulation
Toxic to aquatic organisms Category Acute 1 Chronic 1-4	H400 H410, H411 H412, H413
Hazardous to the ozone layer	H420
Acute toxicity Acute toxicity 1-4	H300, H310, H330 H301, H311, H331 H302, H312, H332
Specific target organ toxicity (STOT) with single and repeated exposure STOT SE 1-2 STOT RE 1-2	H370, H371 H372, H373

Respiratory or skin sensitising Category 1	H334, H317
Skin corrosion or irritation Skin Corr. 1A	H314 Exception: Products for professional use for closed, automatic wash installations may be classified as H314 Skin Corr. 1A if the classification concerns pH.
Explosive Category 1.1-1.6	H200, H201, H202 H203, H204, H205
Organic peroxides	H242
Flammable liquids Flam. Liq. 1-2	H224, H225
Pyrophoric liquids and solids	H250

- Label and data sheet for the product in accordance with European legislation.

O13 Super-concentrates

Super-concentrates are highly concentrated products, but beyond that there is no uniform definition of super-concentrates. Nordic Ecolabelling has chosen to define super-concentrates as products that contain <10% water by volume.

Super-concentrates reduce the loads being transported since water is not being carried unnecessarily. However, super-concentrates may also be hazard classified due to their concentrated form. In order to deal with this, we have chosen to set the requirement that super-concentrates in concentrated form must not be classified as toxic to the environment. At the same time, super-concentrates in useable form (at the maximum recommended dosage) must meet the classification requirements for other products.

For further information on super-concentrates, see the background document for Nordic Ecolabelling of car and boat care products, version 5.

Nordic Ecolabelling has chosen to define super-concentrates as products that contain <10% water by volume.

Proposed requirement:

Super-concentrates are defined as products that contain <10% water by volume.

Super-concentrates must otherwise meet all other requirements for classification as set out in O12 above, in useable form (at maximum recommended dosage).

The packaging for super-concentrates must be designed in such a way that there is no risk that the user will come into contact with the product. For super-concentrates a technical instruction and user manual must be available describing how to avoid contact with the product.

- Declaration on classification of the product in useable form (at maximum recommended dosage) showing that the requirement is met.
- Declaration from the manufacturer regarding packaging design, as well as a technical description and user manual describing how the user can avoid contact with the product.

O14 CMR substances

Nordic Ecolabelling wishes, as far as possible, to limit the use of substances that are carcinogenic, mutagenic and toxic to reproduction (CMR) and therefore prohibits these substances.

The intention of the requirement is to exclude from products the worst of the substances that are hazardous to health. The requirement prohibits substances such as formaldehyde and NTA (Carc3, R40). NTA has been classified as carcinogenic (cat3) since March 2008 and is thus subject to this requirement. NTA present in the product as an impurity in complex makers is exempt from the requirement. The concentration of NTA must, however, not exceed 0.010% in the product.

For further information on the requirement concerning CMR substances in car care products, see the background document for Nordic Ecolabelling of car and boat care products, generation 5.

Proposed requirement:

None of the constituent substances must be classified as carcinogenic, mutagenic or toxic to reproduction (CMR) with the following risk/hazard phrases:

H360

H361

H362

H350

H351

H340

H341

The requirement also applies for substances that may give off substances with the above classifications.

- Declaration from the manufacturer or ingredient supplier of the car care product, see Appendix 8.

O15 Nanomaterials/particles

Nanotechnology, which also includes nanoparticles, is being used to an increasing extent in many product areas, including those for which Nordic Ecolabelling has criteria. The greatest cause for concern is the use of nanoparticles, which can be released and affect health and the environment. There is a worry among public bodies, environmental organisations and others about the lack of knowledge regarding the potential damaging effects on health and the environment.

The European Commission issued an agreed definition of nanomaterials on 18 October 2011⁶, which states that: “A nanomaterial is a natural, incidental or purposely manufactured material containing particles, in an unbound state or as an aggregate or as an agglomerate and where, for at least 50% of the particles in the number size distribution, one or more external dimensions is in the size range 1–100 nm.” Nordic Ecolabelling subscribes to this definition, but judges for itself what limits to set in the different

⁶ COMMISSION RECOMMENDATION of 18 October 2011 on the definition of nanomaterial (2011/696/EU).
Website: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2011:275:0038:0040:EN:PDF> (2/9-13)

product groups. In the recently revised Criteria for the Nordic Ecolabelling of Cleaning Products, Nordic Ecolabelling has set a limit value of 1% in order to cover more materials with a proportion of nanoparticles. When Nordic Swan Ecolabelling transport wash installations, it is the whole service that is ecolabelled, rather than the products. Nordic Ecolabelling therefore finds it appropriate to apply the European Commission's definition with a limit value of 50% for chemical products that will be used in a Nordic Swan Ecolabelled transport wash installation. Manufacturers of car care products must thus adhere to this limit value. Note that polymer emulsions are not counted as a nanomaterial.

Proposed requirement:

Nanoparticles (from nanomaterials*) must not be actively added to chemical products.

**The definition of nanomaterials follows the European Commission's definition as issued on 18 October 2011: "A nanomaterial is a natural, incidental or purposely manufactured material containing particles, in an unbound state or as an aggregate or as an agglomerate and where, for at least 50% of the particles in the number size distribution, one or more external dimensions is in the size range 1–100 nm." Polymer emulsions are not counted as a nanomaterial.*

- Declaration from the manufacturer of the car care product, see Appendix 8.

O16 Organic substances, degradability

Substances with poor degradability can cause environmental problems, and in cases where the substances are also acutely toxic, these environmental problems can become extremely serious. Degradability is therefore a very important characteristic of organic substances and a key environmental parameter describing how long a substance remains in the environment after discharge.

Wash installations that are closed-loop wastewater systems are exempt from the requirement for anaerobic degradability as the chemicals do not reach the municipal treatment plant or recipient.

Proposed requirement:

All organic substances and their degradation products shall be readily aerobically degradable in accordance with OECD Guidelines No. 301 A–F or other equivalent methods (surfactants are exempted from the requirement for the 10-day window) and anaerobically degradable in accordance with ISO 11734 or other similar method.

The following compounds are exempted from the degradability requirement:

- non-chlorinated polymers
- non-chlorinated natural and synthetic waxes
- preservatives
- iminodisuccinate
- fragrances (see separate requirements in O18, O19 and O20)
- dyes in products for professional use (see separate requirements in O23)
- denaturing agents in ethanol

** Wash installations that are closed-loop wastewater systems are exempt from the requirement for anaerobic degradability. A closed-loop wastewater system means that effluent is not discharged to municipal wastewater treatment plants or recipient.*

- Degradability for all organic substances in the car or boat care product shall be documented in accordance with the DID list. If the substance is not on the DID list,

other documentation in accordance with the section on degradability (Appendix 6) shall be submitted.

- For wash installations that are closed-loop wastewater systems: Name of the waste management facility handling the waste products and a description of what happens to the waste products.

017 Substances that must not be present in the products

There are many substances with properties that are hazardous to health and the environment, making them undesirable in Nordic Swan Ecolabelled products. Some are known as substances of very high concern (SVHC) and are included on the Candidate List drawn up by the European Chemicals Agency (ECHA).

For more information on the background to why certain substances must not be present in the products used in Nordic Swan Ecolabelled transport wash installations, see the background document for car and boat care products, generation 5.

Proposed requirement:

The following substances must not be present in the products:

- halogenated and/or aromatic solvents
- organic chlorine compounds and reactive chlorine
- dyes in products for non-professional use
- substances on the Candidate List*
- substances meeting the PBT criteria (persistent, bioaccumulative and toxic substances)**
- very persistent and very bioaccumulative organic substances**
- substances considered as a potential endocrine disrupting chemical (EDC), category I or II, according to the European Union's reports on endocrine disruptors (http://ec.europa.eu/environment/endocrine/documents/final_report_2007.pdf) (Annex L, page 238 onwards)
- linear alkylbenzene sulphonates (LAS)
- alkylphenol ethoxylates (APEO) or alkylphenol derivatives (APD)
- quaternary ammonium compounds, which are not readily degradable
- benzalkonium chloride
- siloxanes D4, D5 and HMDS
- EDTA, DTPA
- poly and perfluorinated alkylated substances (PFAS)

**The Candidate List can be found on the ECHA website: <http://echa.europa.eu/candidate-list-table>*

***PBT and vPvB substances are defined in Annex XIII of REACH (Regulation (EC) No 1907/2006). Substances that meet or substances that form substances that meet the PBT or vPvB criteria can be found at: <http://esis.jrc.ec.europa.eu/index.php?PGM=pbt>. Substances "deferred" or substances "under evaluation" are assumed not to have PBT or vPvB properties.*

- Duly completed declaration, see Appendix 8.

Fragrance

Nordic Ecolabelling has always focused on fragrance in Nordic Swan Ecolabelled products and has noted an active debate surrounding allergenic fragrances, particularly in Denmark.

Allergies are a growing problem, and people with allergies can have allergic reactions when using car and boat care products containing substances that we know are allergenic. Requirements concerning allergenic fragrances in car care products exclude the worst allergenic substances from such products.

In wash installations where the water is recirculated, an unpleasant odour occurs in the recirculated water.

Fragrance has no functional effect in the products beyond its smell, and is often classified as toxic to the environment (H411 Toxic to aquatic life with long lasting effects).

It is desirable to add fragrance to certain products to conceal bad odours from other constituent substances. In wash installations where the water is recirculated, an unpleasant odour also occurs in the recirculated water. Fragrance therefore does actually have a function in wash installations where the water is recirculated, something that is a requirement for Nordic Swan Ecolabelled automatic wash installations. If fragrance is not added, there is a major risk that the water used to wash the transport will have an unpleasant smell, which could cause customers to refrain from using wash installations with recirculated water. This would include Nordic Swan Ecolabelled transport wash installations. In addition, car care products with fragrance currently have an extremely high share of the market. By imposing a ban on fragrance in car care products, we would lose the opportunity to influence a large part of the market for car care products and wash installations in terms of many other highly important environmental factors.

Carcinogenic musk compounds must not be used. Musk compounds are only partly degradable in water treatment units and may therefore enter the environment via the drainage system and waste sludge from the treatment unit. The compounds are stable in the environment and may also bioaccumulate in the food chain.

Most fragrances are classified as allergenic (H317 May cause an allergic skin reaction), and some are also harmful to health (H334 May cause allergy or asthma symptoms or breathing difficulties if inhaled).

The EU's Scientific Committee on Consumer Safety (SCCS) published a report in June 2012 on allergenic fragrances in cosmetic products. The report shows that the list of 26 fragrances cannot be seen as sufficient to cover fragrances with scientifically documented allergenic effects. SCCS recommends that a total of 127 fragrances, including the 26 fragrances that are already restricted in the Detergent Regulation, should be declared by name on cosmetics. In the future, Nordic Ecolabelling wishes to exclude all of these 127 fragrances in Nordic Swan Ecolabelled car and boat care products, but in this version only the 26 fragrances from the Detergent regulation will be restricted.

The proposed fragrance requirements are summed up in the requirements O18, O19 and O20.

O18 Fragrances – IFRA

The use of fragrances must follow IFRA's guidelines.

The guidelines of IFRA (International Fragrance Association) can be found at www.ifraorg.org/guidelines.asp

- Declaration from the manufacturer of the car care product and from the fragrance manufacturer that the use of fragrances follows IFRA's guidelines, see Appendix 8 and Appendix 9.

019 Musk compounds

Musk compounds and polycyclic musk compounds are not permitted in car care products. This includes the following substances:

Compound	CAS number
Musk xylene	81-15-2
Musk ambrette	83-66-9
Musk moskene	116-66-5
Musk tibetine	145-39-1
Musk ketone	81-14-1
HHCB	114109-62-5, 114109-63-6, 1222-05-5, 78448-48-3 and 78448-49-4
AHTN	1506-02-1 and 21145-77-7

- Declaration by the manufacturer of the car care product and by the fragrance manufacturer that the substances listed in the requirement are not present in the product, see Appendix 9.

020 Allergenic fragrance substances

The following allergenic fragrance substances are not permitted in car care products.

Allergenic fragrance substances	CAS-number
Amyl cinnamic	122-40-7
Benzyl alcohol	100-51-6
Cinnamic alcohol	104-54-1
Citral	5392-40-5
Eugenol	97-53-0
Hydroxycitronellal	107-75-5
Isoeugenol	97-54-1
Amylcinnamic alcohol	101-85-9
Benzyl salicylate	118-58-1
Cinnamic aldehyde	104-55-2
Coumarin	91-64-5
Geraniol	106-24-1
Hydroxyisohexyl 3-cyclohexen carboxaldehyde	31906-04-4
Anisyl alcohol	105-13-5
Benzyl cinnamate	103-41-3
Farnesol	4602-84-0
Buthylphenyl methylpropional	80-54-6
Linalool	78-70-6
Benzyl benzoate	120-51-4
Citronellol	106-22-9
Hexyl cinnamic	101-86-0
d-Limonene	5989-27-5
alfa isometyl ionone	127-51-5
Methyl heptine carbonate (methyl 2-octynoat)	111-12-6

Oakmoss extract	90028-68-5
Treemoss extract	90028-67-4

- ☒ Declaration by the manufacturer of the car care product and by the fragrance manufacturer that none of the allergenic fragrances are present in the product.

021 Preservatives

Preservatives are added to products to preserve the products and prevent the growth of microorganisms. Preservatives are toxic as part of their function (they kill bacteria) and can also have other negative health and environmental effects. Nevertheless, the use of preservatives is often necessary to ensure a certain useful life before a product becomes out of date. Preservatives in Nordic Swan Ecolabelled products must not be bioaccumulative, to prevent concentrations building up and entering the food chain.

Proposed requirement:

Preservatives included in products or in constituent substances must not be potentially bioaccumulative. Preservatives are not considered bioaccumulative if the following criteria are met:

Classification	OECD 107 or 117	OECD 305
Not bioaccumulative	logK _{OW} < 4.0	BCF < 500

If there is data on both BCF and logK_{OW}, the value for the highest BCF measured shall be used.

- ☒ Documentation for BCF or logK_{OW}.

022 Volatile organic compounds (VOC)

Volatile organic compounds are generally undesirable since they tend to be harmful to health on use. For some washing operations there are so few alternative substances that it has been found necessary to permit a small amount of volatile organic compounds. The permitted quantity of VOC is calculated based on the Photochemical Ozone Creation Potential (POCP).

Proposed requirement:

The product may only contain a limited amount of volatile organic compounds (VOC) which could contribute to the formation of photochemical ozone, measured as POCP (Photochemical Ozone Creation Potential).

Products that have a VOC content of < 6.0% do not need to undergo the POCP calculation, since the requirement will be fulfilled even in a worst-case scenario.

The maximum content of VOC in the product is 60 g ethylene equivalents/kg product.

$$\frac{\sum (m_1 \cdot POCP_1 + m_2 \cdot POCP_2 + \dots)}{m_{\text{produkt}}} \leq 60 \text{ g C}_2\text{H}_2 \text{ ekvivalenter/kg}$$

m_i – mass in grams of VOC_i in the product

POCP_i – VOC_i substance's factor in Table 1 of Appendix 7 in the criteria for car and boat care products, version 5. The POCP value for each constituent substance/ingredient must be entered in the formula.

m_{produkt} is the mass of the product in kg

Organic compounds are defined as VOC if the vapour pressure > 0,01 kPa ved 20°C.

If there is no data on vapour pressure for an organic substance with a boiling point < 250°C at 101.3 kPa (1 atm), the organic substance is to be included in the POCP calculation.

POCP: Photochemical Ozone Creation Potential (photochemical ozone is a main constituent of smog).

In the case of solvents not included on the list in Appendix 10, POCP values from tests may provide the basis for calculating the permitted VOC content, alternatively the worst case for the VOC group may be used.

In the case of super-concentrates, the POCP calculation must be performed using the useable form (at maximum recommended dosage).

- Product formulation and declaration of fulfilment, including calculation of VOC content.

023 Dyes in professional products

Dyes can have negative effects on health and the environment, and may only be added to professional products if the dye is approved for use in foodstuffs and pigments in the dye are not based on the metals: lead, cadmium, mercury, hexavalent chromium, aluminium or copper.

Lead⁷

Lead is a toxic heavy metal with both acute and chronic health and environmental effects.

Lead is acutely toxic to aquatic organisms and mammals, and also has chronic toxic effects on many other organisms, even in small concentrations.

Lead compounds can damage the unborn child and have the potential to reduce fertility. There has also been a great deal of research into children's exposure to lead in low concentrations, amid suspicions that lead exposure can affect the intellectual development of children.

Lead bioaccumulates in fish and mammals. The absorption of lead often takes place slowly and during long-term chronic exposure. The secretion of lead from organisms takes a long time.

People are exposed to lead primarily through polluted air and food. Lead can also be found in products such as the casing on electric cables, boat keels, blasting abrasives, paints and varnishes. In addition, lead may be found in other types of imported products. The danger of emissions of lead into the environment will usually be greatest when it comes to disposal of the products.

Cadmium⁷

Cadmium and cadmium compounds are acutely and chronically toxic to people and animals. Most cadmium compounds are also carcinogenic.

Cadmium is classified as very toxic by inhalation and carcinogenic. It also presents a possible risk of impaired fertility and damage to the unborn child.

Most cadmium compounds are very acutely toxic to aquatic organisms, particularly in fresh water, and acutely toxic to mammals. Cadmium also has chronic toxic effects on many organisms, even in very small concentrations.

Cadmium is bioaccumulative in fish and mammals, and has a long biological half-life in mammals.

Chromium⁷

Chromium is a metallic element found in several forms in nature. The hexavalent form is considered the most problematic for health and the environment. It is prohibited to use timber impregnated with chromium for most uses. However, chromium leaks from impregnated timber that is already in use, and will do so for a long time to come. Almost 70% of chromium emissions derive from CCA-impregnated timber.

Chromium compounds are not readily degradable and can bioaccumulate in organisms. The health and environmental effects depend on which chromium compound we are exposed to. The hexavalent form is considered more problematic for health and the environment than the trivalent form.

Mercury⁷

Mercury occurs as inorganic and organic chemical compounds, and is one of the most dangerous environmental toxins. Mercury is a threat to the environment and to human health.

The organic mercury compounds are particularly toxic. Mercury compounds are very toxic to aquatic organisms and to mammals. Mercury can have chronic toxic effects, even in small quantities. Mercury can also cause kidney damage, damage to the unborn child and contact allergies.

Mercury bioaccumulates in fish and mammals, and it takes a long time for mercury to be secreted from organisms.

Dyes do not contribute to the performance of a cleaning chemical, but can help facilitate dosing of the products. Correct dosing of the products is important in achieving environmental improvements.

Proposed requirement:

Pigments in dyes must not contain lead, cadmium, mercury, hexavalent chromium, aluminium or copper.

All dyes present in the product as an ingredient or in a raw material must be approved for use in foodstuffs in any Nordic country. Alternatively, the dye must not be bioaccumulative. Dyes are not considered bioaccumulative if the following criteria are met:

Classification	OECD 107 or 117	OECD 305
Not bioaccumulative	logK _{ow} < 4.0	BCF < 500

If there is data on both BCF and logK_{ow}, the value for the highest BCF measured shall be used.

- Declaration that the requirement is fulfilled.
- Specification of E-number (number assigned on approval of foodstuff), alternatively LogK_{ow} or BCF.

024 PVC in packaging

For some products, packaging is a significant element, both in terms of volume and weight. Packaging components may comprise substances that have a negative impact on

⁷ <http://www.miljostatus.no>

health or the environment, such as PVC and other halogenated plastics prohibited for use in packaging for ecolabelled products.

This is because undesirable environmental effects occur when disposing of these types of plastics, and because they contain substances that have a damaging effect on health.

The requirement states that PVC and halogenated plastics must not be present in primary packaging. Caps, lids, pumps and labels are not subject to separate requirements.

Proposed requirement:

PVC and other halogenated plastics shall not be part of the primary packaging or packaging components (including caps/lids/pumps and labels).

Declaration from the manufacturer. Declaration of the type of packaging used.

Energy

Nordic Ecolabelling wishes to focus on the energy consumption of the wash installation and measures that can reduce that consumption. Nordic Ecolabelling would also like the consumer and the licensee to be more aware of the installation's energy consumption and opportunities to reduce it.

Nordic Ecolabelling has its own energy guidelines, which express the desire to set energy requirements, where relevant, according to the principles of:

- Limiting overall energy consumption
- Setting requirements concerning energy source

If it is not possible to set requirements for energy efficiency, the focus may instead be placed on requirements concerning the energy source. Nordic Ecolabelling considers energy consumption to be a relevant parameter in large parts of the life cycle of wash installations, but at the same time judges the steerability, i.e. Nordic Ecolabelling's scope to set requirements, to be low.

A report by IVL Svenska Miljöinstitutet AB from 2004⁸ states that energy consumption is lower at installations with a water treatment unit and 80% percent re-circulation than at installations without water treatment, if one considers the treatment of fresh water and waste water that has to take place (0.1-1 kWh/washed car).

For entirely closed installations that use evaporation technology to remove the salts from the system, the energy consumption is around 5 kWh/washed car. If the heat from such an induction unit is used to heat up the premises or prepare hot wax, net consumption will be around 4 kWh/washed car. An installation that uses 400-500 l/washed car without re-circulation has greater electricity consumption than facilities where 80% of the water is re-circulated, if one takes account of the production of fresh water and the treatment of the waste water, and the energy that requires.

⁸ IVL Svenska Miljöinstitutet AB, Rapport B 1554 Utvärdering av miljöanpassade fordonstvättar ur ett bredare perspektiv (January 2004)

By way of comparison, showering for 5 minutes consumes 2 kWh (60 l water consumption)⁹. The available data thus suggests that energy consumption in the use phase, i.e. at the water treatment unit, is not terribly great.

To give more of a focus on measures that the wash installations themselves can do to reduce energy consumption during operation, version 2 of the criteria features the introduction of a point score requirement for energy management. Experience from the licensing process shows that almost none of the installations prioritised documenting energy management, energy consumption or energy measures, since the installations achieved a sufficient points total in other ways. The requirement for automatic door closure has been changed from a voluntary point score requirement to an obligatory requirement, while requirements for energy reporting and automatic light control remain unchanged. During the consultation it was suggested that the other stipulations concerning energy consumption and energy measures should be removed, but this was met with criticism. Nordic Ecolabelling has therefore chosen to introduce point score requirements for energy saving measures as a result of the consultation.

Basic licence holders are exempted from requirement O25 and have no opportunity to accrue points in requirements P2–P4, as these are measures that individual installations control. Wash installations that make use of a basic licence must document these requirements and fulfil O25.

O25 Automatic door closure

In order to achieve satisfactory performance in the wash installations during the winter, a certain temperature must be maintained in the enclosed facility. To avoid unnecessary heating of the premises, particularly during the winter, wash installations with doors must have a system of automatic door closure for periods where heating is required for satisfactory operation. This means that during warmer periods, for example in the summer, the doors to the wash installation do not need to be controlled automatically.

Experience from licensing shows that requirements for energy management in the form of door closure and automatic lighting control are seen as positive. The measures are clear and signal the intentions of the Nordic Swan Ecolabel. The requirement is of little use for manual wash installations without doors.

The evaluation report from 2012 pointed out that less of a weighting for energy management measures should be considered alongside the introduction of requirements regarding procedures for purchasing new equipment (equipment, for example, that has automatic light control and door closure).

Responses to the consultation show that automatic door closure is already an obligatory requirement in Finland and other locations, and Nordic Ecolabelling therefore believes it is appropriate to change this from a voluntary point score requirement to an obligatory requirement.

Wash installations with fixed washing equipment, where trains and other rail transport are driven through during the washing process, are exempt from the requirement. This is because the doors must remain open so that the trains can run through the installation while being washed.

⁹ Aqua Consult: Förstudie Bilvårdsanläggningar

Proposed requirement:

Enclosed wash installations with doors in and out must have a system of automatic door closure that operates during periods where heating is required to ensure satisfactory operation.

Wash installations with fixed washing equipment, where trains and other rail transport are driven through during the washing process, are exempt from the requirement.

⌚ This will be checked during an on-site inspection.

P2 Energy reporting

Nordic Ecolabelling has little data on the energy consumption of brush machines, fans, pumps and other machinery, but believes this to be an area worth investigating. Generation 2 of the criteria for wash installations has a point score requirement for giving information about energy consumption per wash (measured or calculated over a representative period for the installation). None of the Nordic Swan Ecolabelled installations have, however, provided information on energy consumption. This generation of the criteria for wash installations primarily gives points if energy use is documented with regard to consumption and type of energy source, but the requirement is now weighted more towards us hopefully receiving information about energy consumption.

Data is required per functional unit (washed car) in order to assess the energy consumption of the wash installation and the environmental impact of that consumption in each of the different phases in the life cycle.

Proposed requirement:

2 points are awarded for reporting calculated annual values for energy consumption by energy type (electricity, district heating, oil, etc).

☒ Energy report with calculations.

P3 Automatic light control

There are various standards for energy management, including the Danish DS 2403:2001 Energy Management and the Norwegian standard NS-EN ISO 50001 Energy Management Systems.

The evaluation report for the Nordic Ecolabelling of wash installations, generation 2, from June 2012, states that requirements for energy management should refer to standards of which DS 2403 and equivalent standards are only one example. None of the Danish Nordic Swan Ecolabelled transport wash installations follow the standard DS 2403:2001. Experience from Nordic Swan Ecolabelled transport wash installations shows that measures such as automatic light control and door closure are seen by the employees at the installations as positive and tangible measures (for more background informations see O25).

Proposed requirement:

Automatic light control in the wash installation earns 1 point.

⌚ This will be checked during an on-site inspection.

P4 Energy saving measures

To give more of a focus on measures that the wash installations themselves can do to reduce energy consumption during operation, generation 2 of the criteria features the introduction of a point score requirement for energy management. Experience from the licensing process shows that almost none of the installations prioritised documenting energy management, energy consumption or energy measures, since the installations achieved a sufficient points total in other ways. The requirement for automatic door closure has been changed from a voluntary point score requirement to an obligatory requirement, while requirements for energy reporting and automatic light control remain unchanged. During the consultation it was suggested that the other stipulations concerning energy consumption and energy measures should be removed, but this was met with criticism. Nordic Ecolabelling has therefore chosen to introduce point score requirements for energy saving measures.

Such energy saving measures may include automatic controls that ensure the enclosed wash installation is not heated when one of the doors into the installation is open, thermostatically controlled frost protection for wash installations and LED lighting.

Proposed requirement:

Introduction of energy measures that considerably reduce energy consumption (points are given on approval by Nordic Ecolabelling). 1 point is given per measure, up to a maximum of 2 points.

- Statement according to the requirement.

Procedures

O26 Sludge emptying

To reduce the risk of tanks and containers in water treatment units with re-circulated water being contaminated with bacteria or heavy metals from sludge tanker trucks when emptying sludge, the company that owns the sludge tanker truck must guarantee that the truck is not contaminated with heavy metals or bacteria.

Requirements concerning waste management must ensure that the waste (in this case sludge and other contaminants separated from the water treatment equipment) is processed in an environmentally appropriate way. This means that the facilities that will be processing the waste must also be officially licensed to do so. If the final processing of the waste is not correct/satisfactory, this undermines the purpose of water treatment at the wash installation, since the environmental problem and environmental impact are simply shifted from the wash installation to the waste processing facility.

Proposed requirement:

Tanks and containers in water treatment units with re-circulated water must be filled with clean water. When emptying the sludge, it must be guaranteed that the sludge tanker truck is not contaminated with heavy metals or bacteria.

Waste from oil and sludge separators and other contaminants from the water treatment unit must be processed by a facility that is approved by the authorities to handle this type of waste.

- Declaration, see Appendix 5, that the sludge tanker truck is not contaminated with heavy metals or bacteria before the sludge is emptied, or see Appendix 5 – Emptying

systems for toilets. Declaration that waste from oil and sludge separators and other contaminants from the water treatment unit are processed by a facility that is approved by the authorities to handle this type of waste.

027 Emptying system for toilets

To reduce the risk of the re-circulated water being contaminated with bacteria from toilets in buses, motorhomes, trains or other rail transport there must be an emptying system in place that ensures toilet emptying without cross contamination. If there are no facilities for emptying toilets, the customer must be informed that their toilet cannot be emptied at the installation due to the dangers of spreading infections.

Proposed requirement:

The requirement applies to wash installations for buses, trucks, trains and other rail transport.

If the wash installation is intended to wash installations for buses, trucks, trains and other rail transport with toilets, there must be an emptying system in place that ensures the toilet waste is not emptied in a way that can contaminate the re-circulated water.

If there are no facilities for emptying toilets, the customer must be informed that their toilet cannot be emptied at the installation due to the dangers of spreading infections.

- Description of the emptying system for toilets and description of how customers are informed if there is no emptying system available.

028 Special vehicles

Regulation (EC) No 852/2004 on the hygiene of foodstuffs aims to provide a higher level of protection for human life and health. Under the regulation, vehicles used for transporting food must be kept clean and in good condition, such that food is protected from contamination.

Since re-circulated water from vehicle wash installations is more prone to anaerobic conditions and thus blooms of algae and bacteria, only fresh water is to be used to wash vehicles that require special hygiene levels.

Proposed requirement:

When vehicles requiring special hygiene are washed, such as vehicles covered by EC 852/2004, only fresh water may be used, i.e. no re-circulated water. However, the total emission values per vehicle must be met. If the plant washes both vehicles that demand extra hygiene and vehicles that may be washed with re-circulated water, the plant shall be equipped with a so-called double system. Double system means that the plant can temporarily be switched over to using fresh water only.

- Description of the emptying system for toilets and description of how customers are informed if there is no emptying system available.

029 Self-assessment

To ensure that the individual wash installation meets the requirements for ecolabelling, the installation must conduct a self-assessment and maintain a log of factors such as water consumption, a reading for which is to be taken each month.

It is not possible to have continuous sampling of outgoing water to check that the installation meets the Nordic Ecolabelling requirements for water emissions. The checks that are carried out therefore have to assume that the equipment is working properly.

Even if there is a water meter and monitoring system, one cannot entirely trust the technology, particularly if it is not maintained. A programme must therefore be drawn up for each installation showing what is to be controlled and how often, to ensure good operating conditions. The requirement that the installations must conduct annual emission measurements has been severely criticised, particularly by owners of multiple installations, who see this as a major challenge as regards resources. Experience shows that Nordic Ecolabelling has not prioritised the resources required to follow up annual controls. This does not mean that annual controls are not important, but it is important for Nordic Ecolabelling to set requirements that can be followed up both by licensees and Nordic Ecolabelling itself. The requirement for annual samples for analysis has therefore been changed such that it only applies to basic licence holders. Basic licence holders must conduct annual analyses from one reference installation. Installations whose licence includes a basic licence are exempted from this requirement, while licensees who do not make use of a basic licence must conduct water analyses in line with O29 every two years.

Reporting of water consumption and complaints is to be conducted annually by all licensees.

All self-assessment is to be recorded and collated annually so that it can be reported to the ecolabelling body.

Proposed requirement:

Self-assessment and record-keeping shall be performed in accordance with a self-assessment programme comprising the following:

- The figures for fresh water consumption and number of transport are to be recorded each month.
- The annual average of fresh water consumption is to be calculated as number of litres per wash or 12 metres of train.
- Complaints of a serious nature are to be recorded.

This record is to be submitted to Nordic Ecolabelling once a year.

For basic licence holders and licensees who are not linked to a basic licence, the self-assessment programme must also include:

- Emission samples are to be taken once a year during the period 1 November – 30 April.
- Emission values to be calculated per wash or 12 metres of train for \sum Pb, Ni, Cr plus Cd, Zn, Cu, Sb* and oil.

** Only applies for wash installations for trains and other rail transport.*

For basic licence holders, emission samples are to be taken once a year from the reference installation that is included in the basic licence and 10% of installations that make use of the basic licence, with the latter amounting to a minimum of one installation and a maximum of four installations per year.

For licensees who are not linked to a basic licence, emission samples are to be taken every two years.

- ☒ This information is to be compiled in an annual report and submitted to Nordic Ecolabelling by 30 April each year. Appendix 2 can be used for the self-assessments.

P5 Waste

To encourage wash installations to reduce plastic packaging and ensure recycling, a point is given for sorting the packaging that cleaning and water treatment chemicals are delivered in and sending the sorted waste to a recycling plant for re-use or material recovery.

Proposed requirement:

1 point may be given to wash installations that sort the packaging that cleaning and water treatment chemicals are delivered in and send it to a recycling plant for re-use or material recovery.

This requirement does not apply to basic licence holders.

- Invoice or copy of agreement stating that waste fractions are sent for re-use or material recovery.

Points summary

In the previous version of the criteria for Nordic Ecolabelled wash installations, point score requirements were introduced in addition to the obligatory requirements. Point score requirements were introduced to make the criteria more flexible and to reward installations with lower emissions. There was also a desire to encourage wash installations to report their energy consumption and implement energy efficiency measures. Experience has shown that almost none of the Nordic Swan Ecolabelled wash installations have reported data on energy consumption or conducted measurements of DEHP, VOC or COD. The points system has also proven to be incorrectly weighted in relation to what actually contributes to major environmental gains. In other words, the points system has not had the intended effect.

Nevertheless, in this version Nordic Ecolabelling has chosen to continue with the points system, since the flexibility it provides hopefully steers wash installations towards a focus on lower consumption of water, energy management and greater use of Nordic Swan Ecolabelled products. The points system has been adjusted and the weighting amended compared with the previous generation.

In generation 2 of the criteria, it was possible to achieve a higher points total, and the various requirements were weighted differently. The table below gives a better overview of how the points system has changed.

Requirement	Points g 2	Points g 3
Emission	5	1
Water consumption	4	2
Energy	6	5
Ecolabelled products	4	3
Waste	-	1
Maximum point score	19	12 (9*)
Minimum requirement for all wash installations	5	6 (4*)

* Generation 3 has taken account of the fact that manual installations are not able to implement some of the point score requirements.

Basic licence holders, who cannot achieve points on the requirements P1, P2, P3 and P4, must still report how many points are achieved in terms of water consumption (O7) and chemicals (O8).

For newly built installations and refurbished installations that receive a licence outside the sampling period 1 November – 30 April, it must be documented in the next sampling period that the installation qualifies for a sufficient number of points.

A maximum of 12 points can be achieved for automatic installations. Manual installations can achieve a maximum of 9 points.

Requirement points summary

Automated wash installations must achieve at least 6 points to be Nordic Swan Ecolabelled.

Manual wash installations must achieve at least 4 points to be Nordic Swan Ecolabelled.

Points are given for the following requirements:

- P1:** Emissions of phthalates (1p)
- P2:** Energy reporting (2p)
- P3:** Automatic light control (1p)
- P4:** Energy saving measures (2p)
- P5:** Waste (1p) In addition, points are given for:

Lower water consumption than the minimum requirement (**O7**) (max 2p)

A higher % of Nordic Swan Ecolabelled products (**O8**) (max 3p)

Basic licence

For basic licence holders there is no requirement concerning total points, but the basic licence holder must document the number of points achieved with regard to:

- Water consumption (O7)
- % Nordic Swan Ecolabelled products (O8)

All licensees must use at least 30% Nordic Swan Ecolabelled car care products in their installations.

Requirement	Result achieved	Possible points	Points achieved	
DEHP measurement (P1)	Before treatment: After treatment:	1 p		
Water consumption (O7)	_____ litres/washed transport	Passenger car wash:		
		F, I, N and S:	65 litres: 1 p 45 litres: 2 p	
		DK:	50 litres: 1 p 35 litres: 2 p	
		Manual installations:	60 litres: 1 p (Nordic) 40 litres: 1 p (Denmark)	

		Wash installations for buses and trucks		
		F, I, N and S:	200 litres: 1 p 135 litres: 2 p	
		DK:	155 litres: 1 p 105 litres: 2 p	
		Manual installations:	190 litres: 1 p (Nordic) 130 litres: 1 p (Denmark)	
		Wash installations for trains and other rail transport		
		DK, F, I, N and S:	100 litres: 1 p 65 litres: 2 p	
Chemicals (O8)		> 76% ecolabelled products: 3 p 51-75% ecolabelled products: 2 p < 31-50% ecolabelled products: 1 p		
Energy reporting (P2)		Calculated annual values for energy consumption by energy type (electricity, district heating, oil, etc): 2 p		
Automatic light control (P3)		Automatic light control: 1 p		
Energy saving measures (P4)		Introduction of energy measures that considerably reduce energy consumption (points are given on approval by Nordic Ecolabelling). 1 p is given per measure, up to a maximum of 2 p .		
Waste (P5)		Sorting of packaging that cleaning and water treatment chemicals are delivered in and sending to a recycling plant for re-use or material recovery: 1 p		
Total no. of points:				points

Environmental management including regulatory requirements

To ensure reasonable quality and an appropriate working environment beyond what is demanded in the requirements regarding chemicals, Nordic Ecolabelling normally also sets a number of general requirements in its criteria for products and services.

It is necessary for Nordic Ecolabelling to know, at all times, who the licensee's contact person is for the Nordic Swan Ecolabel. The applicant shall therefore appoint an individual responsible for ensuring the fulfilment of the Nordic Swan Ecolabel requirements, and a contact person for communications with Nordic Ecolabelling.

Changes to the ecolabelled production process may have repercussions for the Nordic Swan Ecolabel licence. A written report of all changes that may relate to the requirements set for the ecolabelled service must therefore be submitted to Nordic Ecolabelling. This will enable Nordic Ecolabelling to provide information on what needs to be done to ensure that the change does not impact on the licence.

In the event of unforeseen non-conformities, Nordic Ecolabelling can assess the consequences of the non-conformity and provide advice on what action the licensee should take.

030 Environmental policy

Proposed requirement:

The company must draw up an environmental policy that sets out the company's level of ambition and the environmental goals that the company is committed to achieving. The environmental policy must be signed by the CEO/MD.

- Copy of the procedure in the environmental management system.

031 Organisation and responsibility

It is important to have an overview of the organisation, along with its various areas of responsibility and functions, to ensure that Nordic Ecolabelling's operational requirements and procedures are followed.

There may be several people involved in operating a wash installation. In addition to the employees at a wash installation, there may be suppliers of washing machines, cleaning chemicals, water treatment equipment and water treatment chemicals. It is therefore important to have a clear division of responsibility. Consequently, a Nordic Swan Ecolabelled transport wash installation must have someone in overall charge of operations at the installation, someone who coordinates with suppliers and someone who is responsible for employee training.

An organisational chart shall be provided, showing areas of responsibility and functions. Including responsibility for the Nordic Swan Ecolabel, marketing and training.

Proposed requirement:

An organisational chart shall be provided, showing areas of responsibility and functions. The information shall also include a contact person for the Nordic Swan Ecolabel, and the people responsible for purchasing, marketing, operating the wash installation and staff training.

- Description of compliance with the requirement and a copy of environmental management procedures.

032 Procedures and instructions

Many washing machines and water treatment units are so technically advanced that they require operation and maintenance of both the washing function and water treatment to be conducted in line with the supplier's instructions. Experience shows that this is a critical point for both the washing results and the quantity of emissions from the wash installations.

In addition to the often technical operational and maintenance instructions that come with washing and water treatment equipment for wash installations, there must be instructions in place that are tailored to the staff who are responsible for day-to-day operations. The instructions must be easy to understand and cover both the washing machine and the water treatment equipment.

The instructions shall/should state which actions/measures the staff are responsible for and which actions require the services of the relevant supplier. It must be made clear what procedures are in place to deal with nonconformities and changes, as well as operational stoppages, and how these are reported to Nordic Ecolabelling. The instructions shall also specify how often the system should be emptied and what indicates the need for emptying.

In addition, the instructions shall contain an action plan for accidents and the name and phone number of the person in charge of quality and operations, as well as service personnel from all suppliers of washing and water treatment equipment and chemicals.

If the water treatment unit is out of service for a prolonged period (more than 30 days), a water sample is to be taken and sent for analysis to ensure that the amount of harmful

bacteria is below a safe level. Where a biological treatment unit is an entirely closed system, it does not matter if cars are washed in the installation.

Proposed requirement:

Each wash installation shall have documented procedures and instructions that ensure that the Nordic Swan Ecolabelling criteria are fulfilled regarding:

- daily checks on the washing and water treatment units, including checking that the water treatment equipment is functional and operates when the wash installation is in use
- implementation of self-assessments
- operation and maintenance of the wash installation
- reporting unforeseen non-conformities and planned changes (for example change of chemicals) to Nordic Ecolabelling

The wash installation must also have procedures to ensure satisfactory protection against the transmission of Legionella, E. coli and other pathogens.

The procedures shall contain the following text:

- In the event of a stoppage lasting longer than 30 days, water samples shall be taken and submitted for analysis. The installation cannot be put back into operation until the analysis results show the level of harmful bacteria is below a safe level.

The wash installation must not be used when the water treatment unit is out of service.

Measures such as sterilisation or disinfection should also be considered if the device or parts of the device have been significantly changed or opened for maintenance purposes in a way that might have allowed or might potentially allow infection to occur.

Declaration of compliance with the requirement.

033 Training

To ensure satisfactory operation of the installation, it is important that employees and personnel involved in daily operations have received training in how to run the installation.

Description of staff training and skills.

034 Storage and handling of chemicals

Chemicals must be stored in a way that contains chemical discharges and allows chemical spills to be channelled via the water treatment unit. In the event of major unexpected emissions, it must be possible to collect the chemicals, for example in the water treatment system's tanks or on an adjacent floor. Alternatively, the chemicals must be contained separately, for example in a bund that is able to contain the volume of the largest container plus 10% of the sum of the other stored volumes. Floor drains in chemical storage rooms must be connected to the water treatment system for the wash installation.

Proposed requirement:

Chemicals are to be stored securely and in line with the requirements in the safety data sheets.

Floor drains in chemical storage rooms must be connected to the water treatment system.

Alternatively, the chemicals must be contained separately, for example in a bund that keeps the chemicals separate. The bund must be able to contain the volume of the largest container plus 10% of the sum of the other stored volumes.

The packaging for chemical products must be designed such that the user does not risk coming into contact with the product during dosing to make dosing easier or when replacing dosing pumps.

- A description of the way in which chemicals are stored and the way in which the drain in the floor of the chemical room is constructed.
- Declaration of the packaging design.

035 Safety data sheets

Up-to-date safety data sheets must be available for all the chemical products used at the installation.

Proposed requirement:

Safety data sheets for the chemical products used for cleaning and water treatment must be readily available at the installation and they must be easily accessible to the people working there.

- Declaration of where the safety data sheets are kept.

036 Information on use of customers' own products/degreasers

The customers must be informed that use of their own degreasers is not permitted. The water treatment system is tailored to a particular type of chemicals, so the use of other product types will disrupt the treatment process.

It is difficult to control which cleaning products the customer uses.

Proposed requirement:

The customers must be informed that use of their own products/degreasers is not permitted. This regards both manual and automatic wash installations.

037 Quality

After being washed in the installation the transport shall be as clean as if it had been washed in some other wash installation that uses equivalent methods of washing.

The definition of a "clean car" is not easy since it is often a case of subjective judgments. The washing chemicals (Nordic Swan Ecolabelled) have already proven that they have satisfactory performance but, when washing in the wash installation, the whole picture must be considered.

In the absence of reliable and standardised testing methods for performance, the business must itself report and explain how the wash installation is just as good as other installations.

Proposed requirement:

After being washed in the wash installation the transport shall be as clean as if it had been washed in some other wash installation that uses equivalent methods of washing.

- Report on complaints.

038 Laws and regulations

Proposed requirement:

The business must comply with environmental laws and regulations in the country in question. This means, for example, that the discharge of water to the drainage system must comply with the environmental authority's instructions. Procedures must be in place to interpret which requirements the environmental legislation demands and to monitor the installation's compliance with the requirements.

039 Purchasing procedures

Changes such as replacing equipment and chemicals may affect the operation of and emissions from the wash installations. Nordic Ecolabelling would like all Nordic Swan Ecolabelled production sites to be made aware of measures that can reduce environmental impacts. Good purchasing procedures could help with this awareness raising. Nordic Ecolabelling therefore sets requirements that licensees must have procedures for setting their own environmental requirements when purchasing goods (Nordic Swan Ecolabelled products where possible) and services. For wash installations, it may also be appropriate to demand machines with a lower energy consumption and cleaning technology that produces low emissions.

Licensees who make use of a basic licence will not have the same opportunity to maintain such procedures, since the basic licence holder is responsible for purchasing, and they are therefore exempted from this requirement.

Basic licence holders and licensees who do not make use of a basic licence must therefore have purchasing procedures in place.

Proposed requirement:

Basic licence holders and licensees who do not make use of a basic licence must have chemical purchasing procedures which ensure that the products are Nordic Swan Ecolabelled or that they meet the Nordic Ecolabelling requirements for chemicals in wash installations.

Basic licence holders and licensees who do not make use of a basic licence, must include procedures for purchasing new equipment that ensure more energy-efficient solutions.



Copy of the procedure in the environmental management system.

040 Technical service

Proposed requirement:

Documented procedures or service agreements that ensure regular checks and servicing.

Servicing records are to be retained and kept readily available.



Copy of procedures in the environmental management system or alternatively a service agreement showing how checks are carried out.

041 Customer information

Proposed requirement:

Customers must be informed about the fact that they are using a Nordic Swan Ecolabelled transport wash installation and what that entails.



Copy of procedures in environmental management system describing how the customers are informed.

042 Documentation from the applicant

Proposed requirement:

A copy of the application is to be accompanied by the supporting fact sheets and calculation data (including test reports, documents from supplier and so on) required as part of the application.



On-site inspection.

043 Annual follow-up

Proposed requirement:

Each year (by 30 April), the environmental requirements shall be followed up by the person responsible for the Nordic Swan Ecolabel licence and then submitted to Nordic Ecolabelling. The following must be sent in:

- Annual average water consumption (O7)
- Number of washed transport in a year
- Emissions calculated per wash or 12 metres of train (O6) (A licensee holder who uses a basic license is excepted from this requirement).
- Overview of chemicals (O8)

044 Marketing

The requirement is removed as decided by the Board of Directors 17 November 2014.

5 Changes compared to previous generation

In this generation, wash installations in the Skåne region must meet the same requirements as installations in the rest of Sweden. This is a change compared with previous generations, where installations in Skåne were subject to the same requirements as installations in Denmark.

Comparison of requirements for wash installations in criteria generation 2 and generation 3.

Req. generation 3	Req. generation 2	Same	Changed	New req.	Draft for consultation
O1	O1 + O2		X		Requirements merged and clarification. New appendix drawn up.
O2	O3		X		Clarification of what should be included in the technical description of the installation.
O3	O4	X			Text amended.
O4	O6	X			Text amended.
O5	M3		X		Requirement for initial sampling has been moved forward in the document. Better explanation of the requirement and the conditions.

Req. generation 3	Req. generation 2	Same	Changed	New req.	Draft for consultation
O6	O7 + P1		X		Text amended and merger of obligatory requirement and point score requirement for emissions. Points for lower emissions summed up in section 1.6. Tightening of requirements concerning Σ Pb, Ni and Cr, and Cd.
P1	P1		X		Requirement amended to require measurements before and after treatment to achieve points. Requirement tightened by requiring measurement of DEHP, DBP, BBP and DIBP.
O7	O8 + P2		X		Text amended and merger of obligatory requirement and point score requirement for water consumption. Water consumption for manual installations now has its own limit values.
O8	O11+O12 + declaration in Appendix 3b		X		Chemicals requirements and general information moved from appendix into criteria document. Introduction of new appendix tailored to the specific chemicals requirements. Proposed obligatory requirement of 20% Nordic Swan Ecolabelled chemicals for basic licence holders.
O9				X	The use of chemicals with added fragrance is not permitted in manual installations.
O10	O13	X			
O11	Appendix 3a	X			
O12	Appendix 3a		X		Requirement updated in line with the most recent version of the criteria for car and boat care products (version 5).
O13	Appendix 3a		X		Requirement updated in line with the most recent version of the criteria for car and boat care products (version 5).
O14				X	The requirement concerning CMR substances is taken from the most recent version of the criteria for car and boat care products (version 5).
O15				X	The requirement concerning nano-materials/particles is taken from the most recent version of the criteria for car and boat care products (version 5).
O16	Appendix 3a		X		Requirement updated in line with the most recent version of the criteria for car and boat care products (version 5).
O17	Appendix 3a		X		Requirement updated in line with the most recent version of the criteria for car and boat care products (version 5).
O18	Appendix 3a	X			Requirement updated in line with the most recent version of the criteria for car and boat care products (version 5).
O19	Appendix 3a	X			Requirement updated in line with the most recent version of the criteria for car and boat care products (version 5).
O20	Appendix 3a	X			Requirement updated in line with the most recent version of the criteria for car and boat care products (version 5).

Req. generation 3	Req. generation 2	Same	Changed	New req.	Draft for consultation
					The list of 26 fragrances has been expanded into a list of 127 fragrances.
O21	Appendix 3a		X		Requirement updated in line with the most recent version of the criteria for car and boat care products (version 5).
O22	Appendix 3a		X		Requirement updated in line with the most recent version of the criteria for car and boat care products (version 5).
O23	Appendix 3a		X		Requirement updated in line with the most recent version of the criteria for car and boat care products (version 5).
O24				X	The requirement concerning PVC packaging is taken from the most recent version of the criteria for car and boat care products (version 5).
O25	P3		X		Automatic door closure changed from a point score requirement to a compulsory requirement.
P2	P3		X		Text amended.
P3	P3	X			Requirement unchanged but now a separate point score requirement.
P4				X	Energy saving measures
O26	O5 + M12		X		Requirement for handling waste from sludge and oil separator has been merged with requirement for sludge emptying and sludge tanker trucks. Text amended.
O27	O9	X			
O28	O10	X			Special vehicles
O29	M4 + M15		X		Requirements merged and text amended.
P5				X	New requirement for sorting packaging at source.
O30				X	Environmental policy – from template.
O31	M1		X		Organisation and responsibility – from template. Clarification.
O32	M5+M7+M8+M14		X		Merger and rewording.
O33	M6	X			Training – from template, but adapted to criteria.
O34	M9		X		Requirement written more clearly.
O35	M10	X			Safety data sheets
O36	M11	X			Information to customers.
O37	M15		X		Quality requirement simplified.
O38	M16		X		Legislation – from template.
O39					Purchasing
O40				X	Technical servicing – from template.
O41				X	Documentation from the applicant – from template.
O42				X	Laws and regulations – from template.
O43				X	Annual follow-up – from template.
O44	M16	X			Marketing

6 References

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7 New criteria

In a future revision, the following points should be considered:

- Requirements regarding the wash installation’s water treatment efficiency. Gather data to establish what percentage of organic matter a water treatment unit has the capacity to remove (calculated as reduced COD concentration in waste water in relation to input water).
- Reviewing the possibility of setting requirements for the wash installations’ total energy consumption.
- Tightening up the requirements concerning emissions from the installations. Lower limits for the existing substances and more substances on the list.
- Tightening up the requirements concerning volatile organic compounds in car care products.