

# THE EU ECOLABEL AND THE POTENTIAL REVISION OF PRODUCT CRITERIA

A.I.S.E. Position paper

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The cleaning and maintenance products industry sector contributes in a very direct manner to the EU and UN sustainable development priorities. Cleaning and hygiene products and services are essential to society and our commitment is to deliver impactful projects in a responsible way, promoting sustainable sourcing, production, design, and consumption. By working together to tackle water quality through chemical safety, reducing our environmental footprint and embracing the circular economy, we drive best practices and aim to be a role model industry.

A.I.S.E. prioritises proactive engagement with EU policy makers, to contribute to a coherent legislative process that fosters innovation, sustainable development, and a circular economy, to realise the full benefits of a single market and ensure that our industry can compete and thrive. In the area of sustainable development, our work is closely aligned with various EU initiatives, especially related to the European Green Deal.

The Joint Research Centre (JRC) is assessing the potential for a revision of the EU Ecolabel criteria for six detergent product groups, i.e.:

- Laundry Detergents (LD) - (Commission Decision (EU) 2017/1218)
- Industrial and Institutional Laundry Detergents (IILD) - (Commission Decision (EU) 2017/1219)
- Dishwasher Detergents (DD) - (Commission Decision (EU) 2017/1216)
- Industrial and Institutional Dishwasher Detergents (IIDDD) – (Commission Decision (EU) 2017/1215)
- Hard Surface Cleaning Products (HSC) – (Commission Decision (EU) 2017/1217)
- Hand Dishwashing Detergents (HDD) – (Commission Decision (EU) 2017/1214)

The European Commission Decisions, which outline the scope, the definition, and the EU Ecolabel criteria for these six detergent product groups were established on 23 June 2017 and will expire on 26 June 2023.

A.I.S.E. believes that the EU Ecolabel criteria must be determined on a scientific basis after considering the whole life cycle of products. In addition, harmonised application of the scheme throughout Member States must be ensured. A revision of the EU Ecolabel Scheme should lead to an improved indication of the most sustainable products, by better integrating product performance into its criteria, as well as objective risk-based assessments for ingredients that are in line with other EU regulatory provisions, such as REACH.

**Given that Ecolabel criteria for several A.I.S.E. product categories are being assessed for potential revision, A.I.S.E. is willing to contribute constructively to this assessment, provided that:**

- the principles enshrined in the EU Ecolabel Regulation are applied fully to the next revision of the criteria; and
- the A.I.S.E. principles listed below are addressed when updating these criteria.

A.I.S.E. guiding technical principles for an involvement in a potential revision of EU Ecolabel criteria:

- The **entire life cycle** of products must be considered when establishing appropriate EU Ecolabel criteria. The criteria must be **science-based** and focused on LCA-based hotspots.
- The environmental or human safety aspects of the ingredients used in ecolabelled products should be measured by **objective risk assessments** (ensuring the absence of adverse effects considering consumer and environmental exposure under realistic conditions) rather than by hazard-based information only (which indicates only potential effects). The criteria should be **in line with REACH** and not in conflict with any published official or peer-reviewed risk assessments.
- Ecolabelled products should have a **good cleaning performance**, as products with poor cleaning performance often lead to compensatory consumer behaviour such as rewashing, higher dosages, and washing at higher temperatures.
- Given the EU focus on circularity, EU Ecolabel criteria should, where possible, consider favouring ingredients made from renewable carbon, which will need to come from sustainably managed sources.
- Better **alignment between EU and potential national ecolabelling criteria** should be sought, when drafting these criteria.
- It is necessary to **clearly dissociate the criteria** applicable to products being used in **household applications** from potential criteria for products and services used in **professional** (industrial and institutional) cleaning applications. These applications are very different, both in terms of product use and surface cleaning / disinfection needs and performance.

A.I.S.E. guiding general principles for an involvement in a potential revision of EU Ecolabel criteria:

- The ability for companies – especially in a fast-moving consumer goods industry – to **innovate** and **easily adapt** their formulations / products must be safeguarded by avoiding bureaucratic and inefficient systems.
- **Sufficient flexibility** should be provided for meeting the various Ecolabel requirements in order to encourage product innovation.
- The revision of the EU Ecolabel criteria should ensure appropriately **harmonised and science-based policies** for horizontal issues across product categories.
- EU Ecolabel criteria should be **handled consistently by the competent authorities**. A central European helpdesk should be established.

**A.I.S.E. is committed to providing its expertise and constructive input to the revision / drafting of EU Ecolabel criteria concerning its industry and looks forward to discussions with the different stakeholders involved.**

Note: A.I.S.E. reserves the right to maintain its reservation on the final criteria that may be adopted, should they, for any reason, not meet the abovementioned principles. The EU Ecolabel





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scheme is a voluntary tool and A.I.S.E.'s participation in the revision of the criteria does not require its member companies to apply for the EU Ecolabel.

### **About A.I.S.E.**

A.I.S.E., the International Association for Soaps, Detergents and Maintenance Products, is the official representative body of this industry in Europe. Our membership totals 29 national associations across Europe, 17 corporate members and 11 value chain partners. The A.I.S.E. network of members represents over 900 companies supplying both household and professional cleaning and maintenance products and services across Europe.

