

Commission Decisions for the award of the EU Ecolabel for detergents and cleaning products (2017)

# Declaration A - from the manufacturer of the industrial and institutional dishwasher detergent

This declaration is used in conjunction with an application for a licence for the **EU Ecolabel of industrial and institutional dishwasher detergents**. To complete the statement, further declarations for all the raw materials used in the product shall be also provided.

declarations for all the raw materials used in the product shall be also provided.  Product name:
As the applicant for the EU Ecolabel for "industrial and institutional dishwasher detergents", I the undersigned declare that the industrial and institutional laundry detergent is manufactured as expressed here and in the other documents submitted for demonstrating the accomplishment with the EU Ecolabel criteria.
I declare that the product meets all applicable legal requirements of the country or countries in which the product is intended to be placed on the market.
Please, <u>select one:</u>
I declare that the most updated DID list ( <b>DID list 2023</b> ), available on the EU Ecolabel website is used for this application. ( <b>Mandatory</b> for <b>new license applications</b> ; <b>optional</b> for <b>existing licenses</b> )
I declare that the <b>DID list 2016</b> , available on the EU Ecolabel website, is used for this application ( <b>Only for existing licenses updating formulation</b> ).
<u>Scope</u>
The product applied for EU Ecolabel licence is a:
Pre-soaks Dishwasher detergent Rinse aid
<b>Multi-component system.</b> I declare it is used to build up a complete detergent and it has been tested as a whole.
Spray. I declare it is dosed via automatic pumps.
I declare that this product is marketed and designed to be used by specialised personnel in professional dishwashers.
I declare that this product is not a dishwasher detergent designed for household dishwashers or a detergent intended to be used neither in washers of medical devices nor in special machines for the food industry.

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#### **Ingoing substances**

	I declare that all product ingoing substances are listed in the following table:
--	--

Water content i	Water content in the product:% (w/w)						
Ingoing			Form / physical	CAS No.	DID Number	Concentration	
Trade name (**) (if applicable)		(e.g. surfactant, builder)	state in the product	(or CI No. or other precise description)	(if applicable)	(%, w/w)	

<sup>(\*)</sup> Preservatives, fragrances and colouring agents shall be indicated regardless of concentration. Other ingoing substances shall be indicated if they are present at or above the concentration of 0,010% weight by weight.

- (\*\*) If the ingoing substance is in the form of nanomaterial, it should be indicated with the word 'nano' written in brackets.
  - I attach the SDS of all the ingoing substances included in the product in accordance with Regulation (EC) No 1907/2006 of the European Parliament and of the Council<sup>1</sup>.
  - For substances forming part of a mixture, I attach the SDS of the mixture.

<sup>&</sup>lt;sup>1</sup> Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) (OJ L 396, 30.12.2006, p. 1).



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### Criterion 1: Toxicity to aquatic organisms

I declare that the critical dilution volume (CDV<sub>chronic</sub>) of the product is within the indicated limits **[insert the CDV<sub>chronic</sub> in the appropriate cell]**:

Water hardness	Soft Medium (<1,5 mmol CaCO3/l) (1,5 – 2,5 mmol CaCO3/l) (l/l of washing solution) (l/l of washing solution)		Hard (>2,5 mmol CaCO3/l) (l/l of washing solution)			
Product type	<b>CDV</b> <sub>chronic</sub>	Limit	CDV <sub>chronic</sub>	Limit	CDV <sub>chronic</sub>	Limit
Pre-soaks		2 000		2 000		2 000
Dishwasher detergents		3 000		5 000		7 000
Multi-component systems		3 000		4 000		5 000
Rinse aids		3 000		3 000		3 000

 $\square$  I attach the spreadsheet with the calculation of the CDV<sub>chronic</sub> of the product.

(Please select one of the two following options)	
All the ingoing substances included in the formulation of the product appear in the DID list Par	t A.
The following ingoing substances included in the formulation of the product do not appear in DID list Part A [insert the name of each one of these substances and their aer biodegradability and chronic or acute toxicity]:	າ the <b>'obic</b>

Name of the substance	Aerobic biodegradability	Chronic or acute toxicity factor	Inorganic substance with very low water-solubility or insoluble in water

I attach a signed declaration with the values of chronic or acute toxicity, as well as the aerobic biodegradability of each ingoing substance not listed in the DID list. I attach the calculation and the related documentation of the data used for the calculation of the chronic or acute toxicity factor and the degradation factor.

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### Criterion 2: Biodegradability

Name of the surfactants	Surfactants classified as hazardous to the aquatic environment (H400 H412)	Anaerobically degradable					
	cluded in the formulation of the prod feach one of these surfactants]:	uct do not appear in the DID list					
All the surfactants included i	in the formulation of the product app	ear in the DID list Part A.					
(Please select one of the two fol	lowing options)						
aquatic environment (H400	I declare that the surfactants included in the product which are classified as hazardous to the aquatic environment (H400 or H412), in accordance with Regulation (EC) No 1272/2008 of the European Parliament and of the Council, are in addition anaerobically biodegradable.						
☑ I declare that all surfactants	lacksquare I declare that all surfactants included in the product are readily degradable (aerobically).						
(a) Biodegradability of surfac	ctants						
Criterion 2: Blodegradability							

Name of the surfactants	Surfactants classified as hazardous to the aquatic environment (H400, H412)	Anaerobically degradable

For surfactants not included in the DID list Part A, I attach documentation related to their degradability.

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#### (b) Biodegradability of organic compounds

I declare that the content of organic substances in the product that are not readily biodegradable or anaerobically non-biodegradable is below the indicated limits [insert the aNBO and an NBO values in the corresponding cells]:

	aNBO (g/l of washing solution)					anNBO (g/l of washing solution)						
Water hardness Product type		oft ol CaCO3/l	Medi 1,5 – 2,5 CaC	5 mmol	>2,5	ard mmol :03/l	<1,5	oft mmol :03/l	1,5 – 2,	lium ,5 mmol :0 <sub>3</sub> /l	>2,5	ard mmol CO3/l
	Value	Limit	Value	Limit	Value	Limit	Value	Limit	Value	Limit	Value	Limit
Pre-soaks		0,40		0,40		0,40		0,40		0,40		0,40
Dishwasher detergents Multi-component systems		0,40		0,40		0,40		0,60		1,00		1,00
Rinse aids		0,04		0,04		0,04		0,04		0,04		0,04

 $\ \ \square$  I attach the spreadsheet with the calculation of the aNBO and anNBO of the product.



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(Please select one of the two following options)

All the ingoing substances included in the formulation of the product appear in the DID list Part A.

The following ingoing substances included in the formulation of the product do not appear in the DID list Part A [insert the name of each one of these substances and their aerobic and anaerobic biodegradability]:

Name of the organic substance	Aerobic biodegradability	Anaerobic biodegradability	Adsorption	Desorption	BCF or log Kow

I attach supporting evidence	(if you select the second option)	)

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### <u>Criterion 3: Sustainable sourcing of palm oil, palm kernel oil and their derivatives</u>

I declare that the product does not contain ingoing substances derived neither from palm oil or palm kernel oil, nor from chemical derivatives of palm oil and for palm kernel oil.								
I declare that the product contains ingoing substances derived from palm oil or palm kernel oil.  And subsequently:								
I declare that the palm oil or the palm kernel oil used in the manufacturing of the ingoing substances originates from sustainably managed plantations.								
I declare that the palm ingoing substances is co	I declare that the palm oil or the palm kernel oil used in the manufacturing of the ingoing substances is covered by a Chain of Custody certificate (CoC).							
I attach: (Please, select among the following choices) <b>Name of the ingoing substance</b>	RSPO - IP	RSPO- S	RSPO- MB	Other				
I declare that the product contains oil or palm kernel oil. I declare the credits from certified growers, crus	I declare that the product contains ingoing substances derived from chemical derivatives of palm oil or palm kernel oil. I declare that I participate in a book & claim system, and therefore buy credits from certified growers, crushers and independent smallholders. I attach:							
Name of the ingoin	ig substance	RSPO - credits	Other					
I attach a declaration fro	m the supplier(s	) with the releva	nt evidence					

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# Ecolabel www.ecolabel.eu

### EU ECOLABEL USER MANUAL DETERGENTS AND CLEANING PRODUCTS

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#### Criterion 4: Excluded and restricted substances

#### (a) Specified excluded and restricted substances

#### (i) Excluded substances

- I declare that the product does not contain any of the following substances regardless of concentration:
  - Alkyl phenol ethoxylates (APEOs) and other alkyl phenol derivatives;
  - Atranol;
  - Chloroatranol:
  - Diethylenetriaminepentaacetic acid (DTPA);
  - Ethylenediaminetetraacetic acid (EDTA) and its salts;
  - Formaldehyde and its releasers (e.g. 2-bromo-2-nitropropane-1,3-diol, 5-bromo-5-nitro-1,3-dioxane, sodium hydroxyl methyl glycinate, diazolidinylurea), with the exception of impurities of formaldehyde in surfactants based on polyalkoxy chemistry up to a concentration of 0,010% weight by weight in the ingoing substance;
  - Glutaraldehyde;
  - Hydroxyisohexyl 3-cyclohexene carboxaldehyde (HICC);
  - Microplastics;
  - Nanosilver:
  - Nitromusks and polycyclic musks;
  - Per-fluorinated alkylates;
  - Quaternary ammonium salts not readily biodegradable;
  - Reactive chlorine compounds;
  - Rhodamine B:
  - Triclosan;
  - 3-iodo-2-propynyl butylcarbamate.

I attach declaration(s) from supplier(s), confirming that the listed substances have not been included in each raw material formulation regardless of concentration.

#### (ii) Restricted substances

I declare that the product does not contain any of the following substances above the indicated limits *[insert the concentration in the product, if applicable]*:

Restricted substance	Concentration in the product (% weight by weight)	Limit established (% weight by weight)
2-methyl-2H-isothiazol-3-one		0,0015
1,2-Benzisothiazol-3(2H)-one		0,0050
5-chloro-2-methyl-4-isothiazolin-3-one/2-methyl-4-isothiazolin-3-one		0,0015

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I declare that the product contains the following amount of phosphorus (P) calculated as elemental P, which does not exceed the limit set **[insert the concentration in the product, if applicable]**.

Prod	uct Category	1	Concentration in the product (g/l of washing solution)	Limit (g/l of washing solution)
		Soft (<1,5)		0,08
Pre-soaks		Medium (1,5-2,5)		0,08
		Hard (>2,5)		0,08
		Soft (<1,5)		0,15
Dishwasher detergents	Water	Medium (1,5-2,5)		0,30
3	hardness	Hard (>2,5)		0,50
	(mmol/	Soft (<1,5)		0,02
Rinse aids	CaCO₃/l)	Medium (1,5-2,5)		0,02
		Hard (>2,5)		0,02
		Soft (<1,5)		0,17
Multi-component system		Medium (1,5-2,5)		0,32
		Hard (>2,5)		0,52

☑ I attach the calculation of P content

 I declare th	hat fragrance	substances	subject to	the	declaration	requirement	provided	in
	(EC) No 648/20							
by weight p	er substance.							

### I attach declarations from suppliers

#### (b) Hazardous substances

#### (i) Final product

I declare that the final product is not classified and labelled as being acutely toxic, a specific target organ toxicant, a respiratory or skin sensitizer, carcinogenic, mutagenic or toxic for reproduction, or hazardous to the aquatic environment, as defined in Annex I to Regulation (EC) No 1272/2008 and in accordance with the following list:

#### Restricted hazard classifications and their categorization

Acute toxicity	
Categories 1 and 2	Category 3
H300 Fatal if swallowed	H301 Toxic if swallowed
H310 Fatal in contact with skin	H311 Toxic in contact with skin
H330 Fatal if inhaled	H331 Toxic if inhaled
H304 May be fatal if swallowed and enters airways	EUH070 Toxic by eye contact
Specific target organ toxicity	
Category 1	Category 2

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H370 Causes damage to organs	H371 May cause damage to organs
H372 Causes damage to organs through prolonged or	H373 May cause damage to organs through prolonged
repeated exposure	or repeated exposure
Respiratory and skin sensitization	
Category 1A/1	Category 1B
H317 May cause allergic skin reaction	H317 May cause allergic skin reaction
H334 May cause allergy or asthma symptoms or breathing difficulties if inhaled	H334 May cause allergy or asthma symptoms or breathing difficulties if inhaled
Carcinogenic, mutagenic or toxic for reproduction	
Categories 1A and 1B	Category 2
H340 May cause genetic defects	H341 Suspected of causing genetic defects
H350 May cause cancer	H351 Suspected of causing cancer
H350i May cause cancer by inhalation	
H360F May damage fertility	H361f Suspected of damaging fertility
H360D May damage the unborn child	H361d Suspected of damaging the unborn child
H360FD May damage fertility. May damage the unborn child	H361fd Suspected of damaging fertility. Suspected of damaging the unborn child
H360Fd May damage fertility. Suspected of damaging the unborn child	H362 May cause harm to breast fed children
H360Df May damage the unborn child. Suspected of damaging fertility	
Hazardous to the aquatic environment	•
Categories 1 and 2	Categories 3 and 4
H400 Very toxic to aquatic life	H412 Harmful to aquatic life with long-lasting effects
H410 Very toxic to aquatic life with long-lasting effects	H413 May cause long-lasting effects to aquatic life
H411 Toxic to aquatic life with long-lasting effects	
Hazardous to the ozone layer	
H420 Hazardous to the ozone layer	

#### (ii) Ingoing substances

I declare that the product do not contain ingoing substances at a concentration of or above 0,010 % weight by weight in the final product that meet the criteria for classification as toxic, hazardous to the aquatic environment, respiratory or skin sensitizers, carcinogenic, mutagenic or toxic for reproduction in accordance with Annex I to regulation (EC) No 1272/2008 and in accordance with the list in Table ablove on *Restricted hazard classifications and their categorization*.

I attach declarations from suppliers or SDS confirming that any of the ingoing substances which meets the criteria for classification with one or more of the hazard statements listed in such table in the form(s) and physical state(s) in which they are present in the product, unless specifically derogated, is not present in the final above the concentration of 0,010% weight by weight

The product contains ingoing substances listed in Annexes IV and V of Regulation (EC) No 1907/2006 that are excluded from sub-criterion 2(b)(ii).

I declare that the product contains the following derogated substances [insert the name and the amount in the final product of these substances]:

Substance	Hazard statement	Name of the substance	Concentration in the final product (% weight by weight)
Surfactants	H400 Very toxic to aquatic life		



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	H412 Harmful to aquatic life with long-lasting effects		
	H400 Very toxic to aquatic life		
Subtilisin	H411 Toxic to aquatic life with long- lasting effects		
	H317 May cause allergic skin reaction		
Enzymes(*)	H334 May cause allergy or asthma		
	symptoms or breathing difficulties if inhaled		
NTA as an impurity in MGDA and GLDA (**)	H351 Suspected of causing cancer		
	's and other auxiliary substances in the pre lower than $0,2\%$ in the raw material as lo 0,10%.		ition in the final
substanc	declarations from suppliers or es fulfil the derogation conditions		nat these ingoing
(c) Substances of vo	ery high concern (SVHCs)		
	final product does not contain any in th the procedure described in Article 5		
I attach declar candidate list s	rations from suppliers or SDS coubstances.	onfirming the non-p	resence of all the
I declare that the	latest list of SVHCs has been used on	the date of this declar	ation.
(d) Fragrances			
I declare that the	product does not contain any fragrand	ces.	
(e) Preservatives			
I declare that all the product; there	the preservatives included in the prodefore, they are present in the dosage a	duct have the unique pappropriated for this pu	ourpose of preserving urpose.
value has been	the preservatives included in the prod measured/provided in order to pro e criterion text]:	luct are not bio-accumi ve that <b>[choose the</b>	ulating. The following <b>most appropriate</b>
	CF:(limit: < 100)	log K <sub>ow</sub> :	<u>(</u> limit: < 3,0)
I declare that the that it has an ant	packaging or any other communication cimicrobial or disinfecting effect.	on of the product does	not claim or suggest
☑ I attach:			



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V	Declarations from suppliers or SDS of any preservative added, showing that the dosage included is for preservation purposes only.
$\checkmark$	Information on BCF or log Kow values of the product.
$\overline{\checkmark}$	Artwork of the packaging.
(f) Colouring ager The product con	nts ntains colouring agents not approved for use in food.
followin	e that all the colouring agents included in the product are not bio-accumulating. The ig value has been measured in order to prove that (choose the most appropriate ing to the criterion text):
	BCF:(limit: < 100)
	Declarations from suppliers  SDS of any colouring agent added. Information on BCF or log Kow values of the product.  Intains colouring agents approved for use in food. In supporting evidence demonstrating that the colouring agent is approved
(g) Enzymes	
The product con	ntains enzymes.
I declare th been used. I atta	at only enzyme encapsulated (in solid form) and/or enzyme liquids/slurries have
	Declarations from suppliers
$\checkmark$	SDS of any enzyme added.
The product do	es not contain enzymes.



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riterion 5: Packaging
a) Packaging take-back systems
The product is delivered in packaging that is part of a take-back system.
☑ I attach supporting evidence
b) Weight/utility ratio (WUR)
Please select one of the two following options)

The primary packaging of the product is made of more than 80% recycled materials	5.
☑ I attach supporting evidence:	

Declarations from suppliers	
Other [indicate evidence attached]	

The primary packaging of the product is made of less than 80% recycled materials.

I declare that the WUR of the product does not exceed the indicated limits [insert the WUR of the product where appropriate]:

Water	Soft		Medi	ium	Hard		
hardness	<1,5 mmol CaCO3/I (g/I of washing solution)			1,5-2,5 mmol CaCO3/lg/l of washing solution)		>2,5 mmol CaCO3/l (g/l of washing solution)	
Product type	WUR	Limit	WUR	Limit	WUR	Limit	
Powders		0,8		1,4		2,0	
Liquids		1,0		1,8		2,5	

<sup>☑</sup> I attach the spreadsheet with the calculation of WUR

#### (c) Design for recycling

☑ I declare that the material composition of the product's packaging is the following:

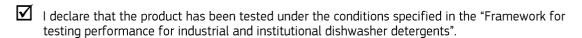
MATERIAL COMPOSITION					
Container	Label or sleeve	Adhesives	Closure	Barrier coating	

 $<sup>{</sup>f oxed{arphi}}$  I attach photos or technical drawings of the primary packaging.



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#### Criterion 6: Fitness for use

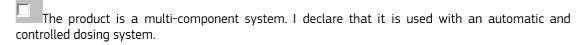


- I declare that the product has achieved at least the minimum wash performance required.
  - $oxed{ ext{I}}$  I attach supporting information or spreadsheet with the results of the testing
  - I attach documentation demonstrating compliance with the laboratory requirements included in the relevant harmonised standards for testing and calibration laboratories.



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#### Criterion 7: Automatic dosing system

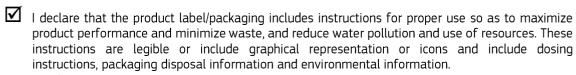


- I declare that customer visits are performed at all premises using the product, at least once a year during the license period, and they include calibration of the dosing equipment.
- ☑ I attach a description of the content of customer visits, who is responsible for them and their frequency.



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#### Criterion 8: User information



☑ I attach a sample of the product label.

#### (a) Dosing instructions

- The product is a multi-component product dosed with an automatic dosing system.
- The product is not a multi-component product dosed with an automatic dosing system.
  - I declare that the dosage instructions include the dose in g or ml and/or second or alternative metric and the impact of the water hardness on the dose.
  - I declare that the dosage instructions include indications of the most prevalent water hardness in the area where the product is intended to be marketed or where this information can be found.

#### (b) Packaging disposal information

I declare that the primary packaging includes information on the reuse, recycling and correct disposal of packaging.

#### (c) Environmental information

I declare that the primary packaging includes a text indicating the importance of using the correct dosage and the lowest recommended temperature.



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### <u>Criterion 9: Information appearing on the EU Ecolabel</u>

	I attach a sample of the product label or artwork of the packaging where the EU Ecolabel is placed.
	✓ "Tested for cleaning performance"
	"Restricted amount of hazardous substances"
	☑ "Limited impact on the aquatic environment"
	(optional) I declare that the label contains a text box with the following text:
$\overline{\checkmark}$	I declare that the EU Ecolabel registration/licence number appears on the product and is used according to the logo guidelines <sup>2</sup> .
	I declare that the logo is used according to the logo guidelines <sup>2</sup> .

In addition I, the undersigned, hereby declare that all the documents provided to demonstrate the accomplishment with the criteria are true and correspond to reality.

Place and date:	Canananiumanalatanani
Place and date:	Company name/stamp:
Responsible person, phone number and	Signature of responsible person:
Responsible person, phone number and	Signature of responsible person:
Responsible person, phone number and e-mail:	Signature of responsible person:
	Signature of responsible person:

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<sup>&</sup>lt;sup>2</sup> Available at: http://ec.europa.eu/environment/ecolabel/documents/logo\_guidelines.pdf