



**EU ECOLABEL USER MANUAL  
DETERGENTS AND CLEANING PRODUCTS**

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

Version: 20180223

## **Declaration A - from the manufacturer of the hand dishwashing detergent**

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

**Product name:**

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**As the applicant for the EU Ecolabel for “hand dishwashing detergents”,** I the undersigned declare that the hand dishwashing 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.
- I declare that the most updated DID list, available on the EU Ecolabel website, is used for this application.

### **Scope**

- I declare that this product is a detergent which is marketed and designed to be used to wash by hand items such as glassware, crockery and kitchen utensils including cutlery, pots, pans and ovenware.
- I declare that the product is a mixture of chemical substances and it does not contain micro-organisms that have been deliberately added by the manufacturer.



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### Ingoing substances

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

I attach a calculation sheet for the product name:

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

(\*) 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.



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- 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.*

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<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 ( $CDV_{chronic}$ ) of the product is within the indicated limit **[insert the  $CDV_{chronic}$ ]:**

Product type	$CDV_{chronic}$ (l/wash)	Limit $CDV$ (l/wash)
Hand dishwashing detergents		2 500

- I attach the spreadsheet with the calculation of the  $CDV_{chronic}$  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 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 biodegradability and chronic or acute toxicity]:**

Name of the substance	Aerobic biodegradability	Chronic or acute toxicity factor	Inorganic substance with very low water-solubility or insoluble in water
			<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>

- 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

#### (a) Biodegradability of surfactants

- I declare that all surfactants included in the product are readily degradable (aerobically).
- 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.

(Please select one of the two following options)

- All the surfactants included in the formulation of the product appear in the DID list Part A.
- The following surfactants included in the formulation of the product do not appear in the DID list Part A ***[insert the name of each one of these surfactants]:***

Name of the surfactants	Surfactants classified as hazardous to the aquatic environment (H400, H412)	Anaerobically degradable
	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>

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

#### (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 anNBO values in the corresponding cells]:***

Product type	aNBO (g/ l of washing water)	Limit (g/ l of washing water)	anNBO (g/ l of washing water)	Limit (g/ l of washing water)
Hand dishwashing detergents		0,03		0,08

- I attach the spreadsheet with the calculation of the aNBO and anNBO of the product.***

(Please select one of the two following options)

- All the organic substances included in the formulation of the product appear in the DID list Part A.
- The following organic 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]:***



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<b>Name of the organic substance</b>	<b>Aerobic biodegradability</b>	<b>Anaerobic biodegradability</b>	<b>Adsorption</b>	<b>Desorption</b>	<b>BCF or log Kow</b>

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



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**Criterion 3: Sustainable sourcing of palm oil, palm kernel oil and their derivatives**

- 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 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)*

Name of the ingoing substance	RSPO - IP	RSPO- S	RSPO- MB	Other
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- I attach a declaration from the supplier(s) with the relevant evidence.*
- 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 ingoing substance	RSPO - credits	Other
	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>

- I attach a declaration from the supplier(s) with the relevant evidence*



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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;
- (only for professional products) Fragrances;
- Glutaraldehyde;
- Hydroxyisohexyl 3-cyclohexene carboxaldehyde (HICC);
- Microplastics;
- Nanosilver;
- Nitromusks and polycyclic musks;
- Phosphates;
- 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)
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2-methyl-2H-isothiazol-3-one <sup>2</sup>		0,0050
1,2-Benzisothiazol-3(2H)-one		0,0050
5-chloro-2-methyl-4-isothiazolin-3-one/2-methyl-4-isothiazolin-3-one		0,0015

**I attach declaration(s) from supplier(s).**

I declare that the total phosphorus (P) content calculated as elemental P is equal to or lower than the limit of 0,08 g/l of washing water.

**I attach the calculation of P content.**

(Please select one of the two following options)

The product is a hand dishwashing detergent for professional use. I declare that fragrance substances are not included.

The product is not a professional product. I declare that fragrance substances subject to the declaration requirement provided in Regulation (EC) No 648/2004<sup>3</sup> are not present in the product in quantities  $\geq 0,010$  % weight by weight per 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	
<b>Categories 1 and 2</b>	<b>Category 3</b>
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	
<b>Category 1</b>	<b>Category 2</b>
H370 Causes damage to organs	H371 May cause damage to organs
H372 Causes damage to organs through prolonged or repeated exposure	H373 May cause damage to organs through prolonged or repeated exposure
Respiratory and skin sensitization	
<b>Category 1A/1</b>	<b>Category 1B</b>
H317 May cause allergic skin reaction	H317 May cause allergic skin reaction

<sup>2</sup> Should the value of 2-methyl-2H-isothiazol-3-one allowed in Annex V (List of preservatives allowed in cosmetic products) to Regulation (EC) No 1223/2009 be lower at the time of the application, then that lower value shall take precedence. From 27 January 2018 0.0015ppm will be allowed only.

<sup>3</sup> Regulation (EC) No 648/2004 of the European Parliament and of the Council of 31 March 2004 on detergents (OJ L 104, 8.4.2004, p. 1).



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H334 May cause allergy or asthma symptoms or breathing difficulties if inhaled	H334 May cause allergy or asthma symptoms or breathing difficulties if inhaled
<b>Carcinogenic, mutagenic or toxic for reproduction</b>	
<b>Categories 1A and 1B</b>	<b>Category 2</b>
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	
<b>Hazardous to the aquatic environment</b>	
<b>Categories 1 and 2</b>	<b>Categories 3 and 4</b>
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	
<b>Hazardous to the ozone layer</b>	
H420 Hazardous to the ozone layer	

**(ii) Ingoing substances**

- I declare that the product does 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 above 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]:***



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Substance	Hazard statement	Name of the substance	Concentration in the final product (% weight by weight)
Surfactants	H400 Very toxic to aquatic life		
	H412 Harmful to aquatic life with long-lasting effects		
Subtilisin	H400 Very toxic to aquatic life		
	H411 Toxic to aquatic life with long-lasting effects		
Enzymes(*)	H317 May cause allergic skin reaction		
	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		

(\*) Including stabilisers and other auxiliary substances in the preparations  
(\*\*) In concentrations lower than 0,2 % in the raw material as long as the total concentration in the final product is lower than 0,10 %.

- I attach declarations from suppliers or SDS confirming that these ingoing substances fulfil the derogation conditions.***

### (c) Substances of very high concern (SVHCs)

- I declare that the final product does not contain any ingoing substances that have been identified in accordance with the procedure described in Article 59(1) of Regulation (EU) No 1907/2006.
- I attach declarations from suppliers or SDS confirming the non-presence of all the candidate list substances.***
- I declare that the latest list of SVHCs has been used on the date of this declaration.

### (d) Fragrances

(Please select one of the following options)

- The product is a hand dishwashing detergent for professional use. I declare that fragrance substances are not included.
- The product is not a professional product and does not contain fragrance substances.
- The product is not a professional product. I declare that all the fragrances included in the product are manufactured and handled following the code of practice of the International Fragrance Association (IFRA).
- I attach declarations from suppliers.***

### (e) Preservatives

- I declare that all the preservatives included in the product have the unique purpose of preserving the product; therefore, they are present in the dosage appropriate for this purpose.



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- I declare that all the preservatives included in the product are not bio-accumulating. The following value has been measured/provided in order to prove that **[choose the most appropriate according to the criterion text]**:
- BCF: \_\_\_\_\_ (limit: < 100)                       log K<sub>ow</sub>: \_\_\_\_\_ (limit: < 3,0)
- I declare that the packaging or any other communication of the product does not claim or suggest that it has an antimicrobial or disinfecting effect.
- I attach:**
- Declarations from suppliers or SDS of any preservative added, showing that the dosage included is for preservation purposes only.**
  - Information on BCF or log K<sub>ow</sub> values of the product.**
  - Artwork of the packaging.**

### (f) Colouring agents

- The product contains colouring agents not approved for use in food.
- I declare that all the colouring agents included in the product are not bio-accumulating. The following value has been measured in order to prove that (choose the most appropriate according to the criterion text):
- BCF: \_\_\_\_\_ (limit: < 100)                       log K<sub>ow</sub>: \_\_\_\_\_ (limit: < 3,0)
- I attach:**
- Declarations from suppliers.**
  - SDS of any colouring agent added.**
  - Information on BCF or log K<sub>ow</sub> values of the product.**
- The product contains colouring agents approved for use in food.
- I attach supporting evidence demonstrating that the colouring agent is approved for food use.**

### (g) Enzymes

- The product contains enzymes.
- I declare that only enzyme encapsulated (in solid form) and/or enzyme liquids/slurries have been used.
- I attach:**
- Declarations from suppliers.**
  - SDS of any enzyme added.**



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- The product does not contain enzymes.

**(h) Corrosive properties**

- I declare that the final product does not classify as 'Corrosive' (C) with H314 in accordance with Regulation (EC) No 1272/2008.
- I declare the following concentrations of all ingoing substances used in the product, either as part of the formulation or as part of any mixture included in the formulation, that are classified as 'Corrosive' (C) with H314 in accordance with Regulation (EC) No 1272/2008:

Hazard statement	Name of the substance	Concentration in the final product (% weight by weight)
H314 Causes severe skin burns and eye damage		

- I attach the product SDS.***



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**Criterion 5: Packaging**

**(a) Weight/utility ratio (WUR)**

(Please select one of the two following options)

**1:** The primary packaging of the product is made of more than 80% recycled materials.

***I attach supporting evidence:***

***Declarations from suppliers.***

***Other [indicate evidence attached]*** \_\_\_\_\_

**2:** I declare that the WUR of the product does not exceed the limit of 0,6 (g/l of washing water).

***I attach the spreadsheet with the calculation of WUR.***

**(b) 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

***I attach photos or technical drawings of the primary packaging.***



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### **Criterion 6: Fitness for use**

- I declare that the “Framework for the performance test for hand dishwashing detergents” has been used for this application.
  
- I declare that the product has achieved a satisfactory wash performance at the lowest temperature and dosage recommended by the manufacturer for the water hardness.
  - 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: User information**

- I declare that the product label/packaging includes instructions for proper use so as to maximize product performance and minimize waste, and reduce water pollution and use of resources. These instructions are legible or include graphical representation or icons and include dosing instructions, packaging disposal information and environmental information.
- I attach a sample of the product label.***

#### **(a) Dosing instructions**

- I declare that suitable steps have been taken to help consumers respect the recommended dosage (i.e. by making available the dosing instructions and a convenient dosing system).
- I declare that dosage instructions include information on the recommended dosage for at least two levels of soiling.
- I declare that dosage instructions include the impact of the water hardness on the dosing.
- I declare that 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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**Criterion 8: Information appearing on the EU Ecolabel**

- I declare that the logo is used according to the logo guidelines<sup>4</sup>.
- I declare that the EU Ecolabel registration/licence number appears on the product and it is used according to the logo guidelines<sup>4</sup>.
- (optional) I declare that the label contains a text box with the following text:
- “Limited impact on the aquatic environment”*
  - “Restricted amount of hazardous substances”*
  - “Tested for cleaning performance”*
- I attach a sample of the product label or artwork of the packaging where the EU Ecolabel is placed.***

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

<sup>4</sup> Available at: [http://ec.europa.eu/environment/ecolabel/documents/logo\\_guidelines.pdf](http://ec.europa.eu/environment/ecolabel/documents/logo_guidelines.pdf)