Nordic Ecolabelling for

Cosmetic products

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Nordic Ecolabelling

Content

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Contact information

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:

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What is a Nordic Swan Ecolabelled cosmetic product?

All cosmetic products covered by the EU Cosmetics Regulation with subsequent amendments, wet wipes, animal care products, sex lubricants and medical lubricants can be Nordic Swan Ecolabelled.

Nordic Swan Ecolabelled cosmetic products are some of the products that have the lowest impact on their environment in their category and they meet both environmental and health requirements. Requirements are set on the environmental properties and health properties of the ingoing substances and on the packaging.

The products go down the drain after use, either directly such as soap, shampoo, and toothpaste, or indirectly by washing bodies, hair, or clothes, such as lotions, creams, hairstyling products and make-up. Properties like biodegradability, bioaccumulability and aquatic toxicity are therefore essential for all ingredients.

Cosmetic products come into direct contact with the body. Therefore, Nordic Ecolabelling also sets strict requirements on the substances with potentially effects that are harmful to health.

Sustainable extraction of renewable raw materials is a vital global issue with a major environmental impact. Nordic Ecolabelling raises awareness of this issue via the requirement for sustainably produced palm oil, which contributes to the production of more sustainable raw materials.

The packaging requirements ensure a high filling degree and stimulate resource efficiency and circular economy by limiting the use of packaging materials. Requirements on packaging design ensure packaging that is recyclable.

Nordic Swan Ecolabel cosmetic products:

- Meet strict health requirements for chemicals, including a ban on substances classified to cause cancer, as toxic to reproduction or to potentially damage genetic material. Also identified or potential endocrine disruptors on up-to-date lists from EU and national authorities or by classification are banned, and it is not allowed to add PFAS.
- Contain no microplastics.
- Contain no fragrances if the skin or hair care product is intended for babies or children.
- Meet strict environmental requirements for chemicals to avoid long-term, negative effects in nature (biodegradability), to avoid harmful chemicals accumulating in animals and humans (bioaccumulation), and to avoid substances that are toxic to, for example, fish and crustaceans (ecotoxicity).
- Responsible sourcing of renewable raw materials is promoted, and any palm oil or palm kernel oil in the product is RSPO certified.
- Have packaging that contributes to a circular economy. The amount of packaging is low, and design and material composition promote recycling.

- Wet wipes contain no plastic fibres.

Why choose the Nordic Swan Ecolabel?

- Licensees may use the Nordic Swan Ecolabel trademark for marketing. The Nordic Swan Ecolabel is a very well-known and well-reputed trademark in the Nordic region.
- The Nordic Swan Ecolabel is a simple way of communicating environmental focus and commitment to customers.
- The Nordic Swan Ecolabel clarifies the most important environmental impacts and thus shows how a company can cut emissions, resource consumption and waste management.
- Environmentally suitable operations prepare licensees for future environmental legislation.
- Nordic Ecolabelling provides businesses with guidance on the work of environmental improvements.
- The Nordic Swan Ecolabel not only covers environmental issues but also quality requirements since the environment and quality often go hand in hand. This means that a Nordic Swan Ecolabel licence can also be seen as a mark of quality.

What can carry the Nordic Swan Ecolabel?

All cosmetic products covered by the EU Cosmetics Regulation (EC) No 123/2009 with subsequent amendments, such as skin care products, hair care products, decorative cosmetics, perfumes, and hygiene products can be Nordic Swan Ecolabelled.

According to the Regulation, “cosmetic product” means any substance or mixture intended to be placed in contact with the external parts of the human body (epidermis, hair system, nails, lips and external genital organs) or with the teeth and the mucous membranes of the oral cavity with a view exclusively or mainly to cleaning them, perfuming them, changing their appearance, protecting them, keeping them in good condition or correcting body odours.

Wet wipes are included in the definition of the product group, as the liquid on the wipe is intended for functions as described above.

Hand dishwashing detergents with added skin protection, perfumed toilet paper or tissues with lotion, for example, do not meet the above criteria and are not included in the definition.

Mix-it-yourself cosmetics kits, where all ingredients and mixing instructions are provided as a single unit, are covered by the cosmetics products regulation and can be Nordic Swan Ecolabelled. This also includes concentrated products in any form, that are diluted with water by the user to form the finished product.

Hand dishwashing detergents with added skin protection, perfumed toilet paper or tissues with lotion, for example, do not meet the criteria of the Cosmetic products regulation and cannot be Nordic Swan Ecolabelled.

In addition to products within the scope of the cosmetic products regulation, the product group also includes a number of other product types:

Lubricants for medical purposes (such as medical examinations with or without e.g. an ultrasound probe) as well as lubricants marketed as “sex products” (such as lube, anal creams, and orgasm gels) can be Nordic Swan Ecolabelled when their formulations are similar to cosmetic products. Lubricants for medical purposes are part of the scope of the Medical Device Regulation (EC) No 726/2004, which can also be the case for “sex products”.

Products for animals, but otherwise corresponding to cosmetic products for human use, can be Nordic Swan Ecolabelled when their formulations are similar to cosmetic products.

Products within the scope of the Biocides Regulation 528/2012 cannot be Nordic Swan Ecolabelled. Products that are marketed as being antibacterial, antimicrobial, antiseptic and/or disinfectant or claim to have ingredients that have these properties cannot be Nordic Swan Ecolabelled, as this does not comply with the Biocides Regulation 528/2012.

The product group includes both products for consumers and for professional use.

How to apply

Application and costs

For information about the application process and fees for this product group, please refer to the respective national web site, see first in this document.

What is required?

The application consists of an application form/web form and documentation showing that the requirements are fulfilled.

Each requirement is marked with the letter O (obligatory requirement) and a number. All requirements must be fulfilled to be awarded a licence.

The text describes how the applicant shall demonstrate fulfilment of each requirement. There is also an icon in the text to make this clearer:

- Upload
- On-site inspection

All information submitted to Nordic Ecolabelling is treated confidentially. Suppliers can send documentation directly to Nordic Ecolabelling, and this will also be treated confidentially.

Licence validity

The Nordic Swan Ecolabel licence is valid providing the criteria are fulfilled and until the criteria expire. The validity period of the criteria may be extended or adjusted, in which case the licence is automatically extended, and the licensee informed.

Revised criteria shall be published at least one year prior to the expiry of the present criteria. The licensee is then offered the opportunity to renew their licence.

On-site inspection

In connection with handling of the application, Nordic Ecolabelling normally performs on-site inspection visit/-s to ensure adherence to the requirements. For such an inspection, data used for calculations, original copies of submitted certificates, test records, purchase statistics, and similar documents that support the application must be available for examination.

Queries

Please contact Nordic Ecolabelling if you have any queries or require further information. See contact information first in this document. Further information and assistance (such as calculation sheets or electronic application help) is available. Visit the relevant national website for further information.

1 Requirements

1.1 Definition of the product group

All cosmetic products covered by the EU Cosmetics Regulation with subsequent amendments, such as skin care products, hair care products, decorative cosmetics, and perfumes can be Nordic Swan Ecolabelled.

According to the Regulation, “cosmetic product” means any substance or mixture intended to be placed in contact with the external parts of the human body (epidermis, hair system, nails, lips and external genital organs) or with the teeth and the mucous membranes of the oral cavity with a view exclusively or mainly to cleaning them, perfuming them, changing their appearance, protecting them, keeping them in good condition or correcting body odours. Wet wipes are included in the definition of the product group, as the liquid on the wipe is intended for functions as described above. Hand dishwasher detergents with added skin protection, perfumed toilet paper or tissues with lotion, for example, do not meet the above criteria and are not included in the definition.

Mix-it-yourself products (cosmetics kits), in which all the ingredients together with instructions for mixing the product are sold as a combined unit/single product are covered by the Cosmetics Regulation and can be Nordic Swan Ecolabelled.

Wet wipes can be Nordic Swan Ecolabelled even if there is only lotion in the product, which is covered by the Cosmetics Regulation. Animal care products can be Nordic Swan Ecolabelled although these are not covered by the Cosmetics Regulation.

Lubricants for medical purposes (such as medical examinations with or without e.g. an ultrasound probe) as well as lubricants marketed as “sex products” (such as lube, anal creams, and orgasm gels) can be Nordic Swan Ecolabelled when their formulations are similar to cosmetic products. Lubricants for medical purposes are part of the scope of the Medical Device Regulation, which can also be the case for “sex products”.

Products covered by the Biocides Regulation 528/2012 cannot be Nordic Swan Ecolabelled. Products that are marketed as being antibacterial, antimicrobial, antiseptic and/or disinfectant or claim to have ingredients that have these properties cannot be Nordic Swan Ecolabelled, as this does not comply with the Biocides Regulation 528/2012.

1.2 Other definitions

For the purpose of this document, the following definitions shall apply.

Definition	Description
Due Diligence system	This means implementing procedures and measures to ensure that your products come from sources that are deforestation-free or comply with the country's laws. Licensees need to gather supply chain information, assess risks of non-compliant supply chains, and take necessary actions to mitigate any identified risk of sourcing no-compliant raw materials.
Rinse-off product	A cosmetic product marketed as intended to be removed with water after use in normal conditions. This includes products that according to the usage instructions are rinsed off with water immediately after use (e.g. shampoo, conditioner, soaps, shaving cream, bath foam and scrubs, cleansing products/gels, hair treatments and peels). Solid shampoo/conditioner and shower bars are also included. Note that toothpaste and mouthwash is considered rinse-off but must meet requirement O20 Biodegradability and aquatic toxicity instead of O18 aNBO and O19 CDV.
Leave-on product	A cosmetic product marketed as not intended to be removed with water after use in normal conditions. This includes products stay on the skin (e.g. creme, lotion, perfumes). Products that according to the usage instruction are rinsed off with cotton wool, cotton pads etc. are also included (e.g. cleansing lotion, eye make-up remover). Note that lubricants are considered leave-on.
Ingoing substances	All substances in the cosmetic product including additives (e.g., preservatives and stabilisers) in the raw materials. Substances known to be released from ingoing substances (e.g., formaldehyde, arylamine, in situ-generated preservatives) are also regarded as ingoing substances.
Impurities	Residuals, pollutants, contaminants etc. from production, incl. production of raw materials that remain in the cosmetic product in concentrations less than 100 ppm for rinse-off products and 10 ppm for leave-on products if no other limit is stated in the requirement. Impurities in the raw materials exceeding concentrations of 1000 ppm are always regarded as ingoing substances, regardless of the concentration in the cosmetic product. Examples of impurities are residues of the following: residues or reagents incl. residues of monomers, catalysts, by-products, scavengers, and detergents for production equipment and carry-over from other or previous production lines. The impurity limits apply to each individual substance that is excluded, i.e., Impurities with the same classification in different raw materials shall not be summed up to comply with the limit. The same contaminants in different raw materials also do not need to be summed.
Microplastics	Synthetic polymer microparticles as defined in REACH Regulation ((EC) No 1907/2006), Annex XVII, Entry no. 78: Synthetic polymer microparticles: polymers that are solid, and which fulfil both of the following conditions: a) are contained in particles and constitute at least 1% by weight of those particles; or build a continuous surface coating on particles. b) at least 1% by weight of the particles referred to in point (a) fulfil either of the following conditions: (i) all dimensions of the particles are equal to or less than 5 mm. (ii) the length of the particles is equal to or less than 15 mm and their length to diameter ratio is greater than 3. The following polymers are excluded *from* this designation:

Definition	Description
	a) polymers that are the result of a polymerisation process that has taken place in nature, independently of the process through which they have been extracted, which are not chemically modified substances. b) polymers that are biodegradable as proved in accordance with Appendix 15 [to REACH, Regulation (EC) No 1907/2006]. c) polymers that have a solubility greater than 2 g/L as proved in accordance with Appendix 16 [to REACH, Regulation (EC) No 1907/2006]. d) polymers that do not contain carbon atoms in their chemical structure. *Note that the following "Conditions of restriction" paragraphs apply: 1 (concentration limit in mixtures), 2 (definitions), 3 (particle size limits). The remaining points do not apply, e.g. 4 (Paragraph 1 shall not apply to the placing on the market of:), e.g. 4(a) "synthetic polymer microparticles, as substances on their own or in mixtures, for use at industrial sites", 5 (derogations), e.g. 5 (b) "synthetic polymer microparticles the physical properties of which are permanently modified during intended end use in such a way that the polymer no longer falls within the scope of this entry".*
Nanomaterials	Insoluble or biopersistent and intentionally manufactured materials with one or more external dimensions or an internal structure in the region of 1-100 nm. *Nordic Ecolabelling reserves the right to adopt a newer definition, should the Cosmetic Products Regulation ((EC) No 1223/2009) implement an adjusted definition*.
Surfactants	Any organic substance, which has surface-active properties, and which consists of one or more hydrophilic and one or more hydrophobic groups of such a nature and size that it is capable of reducing the surface tension of water. Substances on the DID-list with number 2001-23xx are considered surfactants and substances with number 2401-26xx are not considered surfactants.
DID-list	The DID-list (Detergent Ingredient Database) part A contains information on toxicity and degradability of several substances that are used in cosmetic products. If an ingoing substance is included on the DID-list, the data from the DID-list must be used for calculations of the amount of aerobic/anaerobic non-biodegradable organics, the critical dilution value and biodegradability and toxicity. If a substance is not included on the DID-list, or data is missing, the methods described in part B of the DID-list must be used. For this criteria generation, the DID-list dated 2023 or later versions apply. See further details in Appendix 7. The DID-list can be obtained from the Nordic Swan Ecolabelling websites.
Wet wipes	Pre-wetted cloths of non-wowen fabric, where the lotion is covered by the EU Cosmetic Products Regulation.
Animal care product	Any product intended to be placed in contact with animal hair or skin to clean them or to improve the condition of it, such as shampoos, conditioners and sun protection for animals
Sex lubricants	Lubricants with formulations similar to cosmetic products, that are marketed as "sex products" (such as lube, anal creams, and massage oil).
Medical lubricants	Lubricants with formulations similar to cosmetic products, that are marketed for medical purposes such as medical examinations with or without e.g. an ultrasound
Primary packaging	In accordance with EU Directive 94/62/EC on packaging and packaging waste, the term "primary packaging" is defined as consumer packaging, i.e., packaging conceived to constitute a sales unit to the final user or consumer at the point of sale.
Packaging component	A component is a component that is easily separable from other components without the use of tools. Examples are bottles, jars, detachable lids, pumps with thread necks, and labels. A component is also characterized by having its own identification reference to which appendices, purchase no., technical drawing etc. apply. A subcomponent is characterized by being an integrated undetachable part of a main component and by not having its own identification reference (e.g. metal part in pump, tamper evident sealing on tube)
Separability of packaging components	Separability indicates that the product packaging can be separated into each their material and polymer fraction. If it contains a thread neck, it is by default separable. If it does not, action should be taken e.g by documenting that it can be separated without use of tools. If components are not separable, they will be evaluated as one components based on the biggest ingoing element by weight.
Products for domestic use	Products for domestic use are products sold in retail to private consumers.
HoReCa sector	Hotel, restaurant and catering sector
Secondary raw material for packaging	Secondary raw materials are defined here as residual products from other production processes, such as waste products from the food industry, by-products such as straw from grain production, by-products from maize and dried palm leaves. PFAD from palm oil is not counted as a residual/waste product.

Definition	Description
Bio-based material for packaging	Bio-based means that the material consists of biomass that may have undergone physical, chemical, or biological treatment(s). Biomass has a biological origin but excludes material that is found embedded in geological and/or fossil formations. Examples of biomass are: (all or parts of) plants, trees, algae, marine organisms, microorganisms, animals, etc.
Pre-consumer recycled	Material in the pre-consumer phase: Material that has been taken from the waste flow during the manufacturing process. The exception is the re-use of material that is generated in a process, e.g., waste that can be recycled within the same process that generated it.
Post-consumer recycled	Post-consumer/commercial recycled material is defined in the requirement according to ISO 14021:2016: "Post-consumer/commercial" is defined as material generated by households or by commercial, industrial and institutional facilities in their role as end-users of the product, which can no longer be used for its intended purpose. This includes returns of material from the distribution chain.
Concentrated product, main packaging	Packaging containing the undiluted concentrated product, which is to be diluted with water in a refill packaging.
Concentrated product, refill packaging	Packaging in which the concentrated product is diluted with water and thus refilled multiple times.

1.3 General requirements

Unless otherwise stated, the requirements in the criteria document and accompanying appendices apply to all ingoing substances in the Nordic Swan Ecolabelled product, and impurities are exempted from the requirements.

O1 Description of the product

The applicant must give detailed information on the cosmetic product to which the application relates. The following information is required:

- Description of the product
- A complete recipe for the product. Foil that is not removed before use, and that is water soluble is considered part of the recipe. The recipe must, if possible, include for each ingoing substance:
    - Trade name
    - Chemical name
    - INCI name (International Nomenclature of Cosmetic Ingredients)
    - Amount (both with and without solvents, e.g., water)
    - CAS No. and/or EC number
    - DID number for substances that can be placed in the DID-list 2023 or later versions*
    - Function

If a raw material consists of several substances, data for all ingoing substances is to be stated in the recipe.

** DID-list: "Detergents Ingredients Database" list, see Appendix 7 for a detailed description.*

⇪ Description of the product, e.g., label or other documentation.

⇪ Complete recipe in line with the requirement, Nordic Ecolabelling's calculation sheet for cosmetic product can be used.

⇪ Safety data sheet for each raw material in line with prevailing legislation in the country of application, e.g., Annex II to REACH (Regulation 1907/2006/E2EC).

O2 SCCS

Recommendations from the EU's Scientific Committee on Consumer Safety, SCCS Opinions[1], must be complied with where there is an unambiguous conclusion from SCCS. In cases where there is a direct conflict with other requirements in this criteria document, it is always the most restrictive requirement that applies.

⇪ Appendix 1 or equivalent declaration completed and signed.

O3 Supply chain policy and code of conduct

The licence holder must have a) supply chain policy and b) a Code of Conduct for responsible sourcing of minerals and renewable raw materials* used in the cosmetic product. The supply chain policy and code of conduct must be both public and communicated to the supply chain. Licence holders that are micro companies with maximum 10 employees are exempted.

a) The supply chain policy must include the following:

- A policy statement committing the licence holder to respect human rights and the environment within its operations and supply chain; this includes a commitment to support suppliers' compliance with the supplier code of conduct by engaging in responsible purchasing practices.
- Commitment to comply with all applicable local, national- and international environmental laws and regulations, as well as all applicable health and safety regulations.
- A description for governance processes in place for Due Diligence; this includes routines for assessing biodiversity and deforestation risk along the whole supply chain.

b) The supplier Code of Conduct must inform all suppliers of what is expected of them with respect to the Licensee's supply chain policy regarding human rights and protecting the environment.

** Renewable raw materials compose of biomass and that can be continually replenished for example wood, crops, marine products, organic waste or be recycled raw materials*

⇪ Submit supply chain policy according to the requirement or reference to info on webpage.

⇪ Submit supplier Code of Conduct according to the requirement or reference to info on webpage.

⇪ Submit information on how the supply chain policy and supplier Code of Conduct are public and communicated to the supply chain.

O4 Certified raw materials from oil palms

If renewable raw materials from palm oil are used in the product, the palm oil/palm kernel oil must be RSPO certified. This also includes by-products, residues, and waste fractions from palm oil industries, such as palm fatty acid distillate and palm effluent sludge. Traceability must be ensured by Mass Balance, Segregated, or Identity Preserved. Book and Claim are not accepted. The requirement does not apply to substances derived from palm oil/palm kernel oil in raw materials where the substances amount to < 1% in the cosmetic product.

[1] https://health.ec.europa.eu/scientific-committees/scientific-committee-consumer-safety-sccs_en

Appendix 2 or equivalent declaration completed and signed by all relevant raw material manufacturers/suppliers.

A valid RSPO Supply chain certificate from all relevant raw material manufacturers/suppliers or a valid RSPO Supply chain certificate from the manufacturer of the cosmetic product.

By request, the manufacturer of the cosmetic product must present invoices/delivery notes/order confirmation that the palm oil purchased is RPSO certified and information about traceability system (Mass Balance, Segregated or Identity Preserved accepted).

By request, the manufacturer of the cosmetic product must, if they are RSPO Chain of Custody certified, present a third party-controlled balance sheet showing RSPO certified raw materials being accounted/recorded to the cosmetic product(s).

O5 Classification of ingoing substances

Ingoing substances must not be classified with the hazard codes listed in the table below, in accordance with CLP Regulation 1272/2008.

Table 1 Classification of ingoing substances

Hazard class	Hazard class and category	Hazard code
Carcinogenicity*, **	Carc. 1A or 1B Carc. 2	H350 H351
Germ cell mutagenicity*	Muta. 1A or 1B Muta. 2	H340 H341
Reproductive toxicity*	Repr. 1A or 1B Repr. 2 Lact.	H360 H361 H362
Respiratory or skin sensitisation***	Resp. Sens. 1, 1A or 1B Skin Sens. 1, 1A or 1B	H334 H317
Acute toxicity****	Acute Tox. (oral) 1 or 2	H300
Hazardous to aquatic environment	Aquatic Chronic 1	H410, M>1******
Endocrine disruption for human health*****	ED HH 1 ED HH 2	EUH380 EUH381
Endocrine disruption for the environment*****	ED ENV 1 ED ENV 2	EUH430 EUH431
Persistent, Bioaccumulative and Toxic properties***** Very Persistent, Very Bioaccumulative properties*****	PBT vPvB	EUH440 EUH441
Persistent, Mobile, and Toxic properties Very Persistent, Very Mobile properties	PMT vPvM	EUH450 EUH451

** Including all combinations of stated exposure routes and stated specific effect. For example, H350 also covers classification H350i.*

*** Titanium dioxide (CAS 13463-67-7) is exempted from the requirement until the appeal case on the CMR classification is settled, which is expected by Q2 in 2025. The following conditions apply:*

- *The product must not be loose powder, spray form, toothpaste, or lip products (lip balm, lipstick, lip gloss, lipliner, and similar)*
- *Titanium dioxide in powder form must be added in a closed system, in a suspension or by means of a method that promotes a "low dust" working environment e.g., using protective equipment which heavily reduce the dust or*

completely remove the dust from the raw materials (e.g., exhaust ventilation, personal protective equipment and clear safety instructions)

**** The following substances are exempted:*

- *Enzymes that are in liquid form or in solid form as granulates (including stabilisers in the enzyme raw material) and not used in spray products.*
- *Fragrance can be included in the final product according to the fragrance requirements O9-O11*
- *Tocopherol and tocopherol acetate (DID no. 2618)*
- *Amidoamines in betaine raw materials, such as cocamidopropyl betaine (CAPB): Max. 1% of the betaine active content in the raw material, e.g. for raw materials with 30% betaine active content max. 1% · 30% = 0.3% amidoamine in the raw material.*

***** Only applies to lip products, toothpaste, oral hygiene products, and nipple cream. All other products are exempted.*

****** See also O7 Excluded substances for additional requirements for potential or identified endocrine disruptors and PBT/vPvB substances*

******* M is the multiplying factor used for substances classified as chronic aquatic toxicity category 1, as stated in the CLP Regulation (EC) No 1272/2008.*

⇪ Safety data sheet for all ingoing substances in line with prevailing European legislation (Annex II to REACH Regulation, 1907/2006/EC).

⇪ Appendix 1 or equivalent declaration completed and signed.

⇪ Appendix 2 or equivalent declaration completed and signed by all raw material manufacturers/suppliers.

O6 Microplastics

Microplastics* must not be present as ingoing substances in the cosmetic product and must not be added to the product during manufacturing.

An exemption for sunscreen products applies until 17. October 2029.

Exemption to the definition of impurities: Microplastic present ≥ 100 ppm in both rinse-off and leave-on products are considered ingoing substances.

Nordic Ecolabelling reserves the right to change the requirement when more guidance from the EU on the restriction of synthetic polymer microparticles in REACH is published.

** Microplastics are synthetic polymer microparticles as defined in REACH Regulation ((EC) No 1907/2006), Annex XVII, Entry no. 78: Synthetic polymer microparticles: polymers that are solid, and which fulfil both of the following conditions:*

a) are contained in particles and constitute at least 1% by weight of those particles; or build a continuous surface coating on particles.

b) at least 1% by weight of the particles referred to in point (a) fulfil either of the following conditions:

   (i) all dimensions of the particles are equal to or less than 5 mm.

   (ii) the length of the particles is equal to or less than 15 mm and their length to diameter ratio is greater than 3.

The following polymers are excluded from this designation:

a) polymers that are the result of a polymerisation process that has taken place in nature, independently of the process through which they have been extracted, which are not chemically modified substances.

b) polymers that are biodegradable as proved in accordance with Appendix 15 [to REACH, Regulation (EC) No 1907/2006].

c) polymers that have a solubility greater than 2 g/L as proved in accordance with Appendix 16 [to REACH, Regulation (EC) No 1907/2006].

d) polymers that do not contain carbon atoms in their chemical structure.

N.B. The following "Conditions of restriction" paragraphs apply: 1 (concentration limit in mixtures), 2 (definitions), 3 (particle size limits). The remaining points do not apply, e.g. 4 (Paragraph 1 shall not apply to the placing on the market of:), e.g. 4(a) "synthetic polymer microparticles, as substances on their own or in mixtures, for use at industrial sites", 5 (derogations), e.g. 5 (b) "synthetic polymer microparticles the physical properties of which are permanently modified during intended end use in such a way that the polymer no longer falls within the scope of this entry".

⇪ Appendix 1 or equivalent declaration completed and signed.

⇪ Appendix 2 or equivalent declaration completed and signed by all raw material manufacturers/suppliers.

O7 Excluded substances

The following substances or substance groups must not be present as ingoing substances in the cosmetic product.

- 1,4-dioxane (CAS No. 123-91-1).

  Exemption to the definition of impurities: 1,4-dioxane impurities present at ≥ 10 ppm in both rinse-off and leave-on products, are considered ingoing substances.

- 2-ethylhexyl (2E)-3-(4- methoxyphenyl)acrylate (CAS No. 83834-59-7).

- Alkylphenols (AP) (e.g. butylated hydroxy anisole (BHA, CAS No. 25013-16-5), alkylphenol ethoxylates (APEO), and other alkylphenol derivates (APD).

  An exemption is made for BHT (CAS No. 128-37-0) in perfumes in the amount of ≤ 100 ppm, provided that the amount in the cosmetic product is ≤ 1 ppm.

- Bisphenols and bisphenol derivatives belonging to the group of 34 substances that have been identified by ECHA for further EU regulatory risk management that are known or potential endocrine disruptors for the environment or for human health, or that can be identified as toxic for reproduction[2].

  These include: EC/List No. 201-245-8 (BPA), 201-025-1 (BPB), 401-720-1 (4,4'-Isobutylethylidenediphenol), 216-036-7 (BPAF) and its 8 salts (278-305-5; 425-060-9; 443-330-4; 468-740-0; 469-080-6; 479-100-5; 943-265-6; 947-368-7), 201-250-5 (BPS), 201-240-0 (BPC), 204-279-1 (TBMD), 201-618-5 (6,6'-di-tert-butyl-4,4'-butylidenedi-m-cresol), 242-895-2, 248-607-1, 405-520-5 (D8), 217-121-1 (DAB), 227-033-5 (TMBPA), 210-658-2 (BPF), 411-570-9, 277-962-5 (contains BPS, 500-086-4 (contains BPA), 500-263-6 (contains BPA), 500-607-5 (contains BPA), 701-362-9, 904-653-0 (contains BPA), 908-912-9 (contains

[2] Assesment of regulatory needs: Bisphenols, ECHA, 16 December 2021: Section 2.1: Bisphenols for which further EU RRM is proposed: https://echa.europa.eu/documents/10162/c2a8b29d-0e2d-7df8-dac1-2433e2477b02

BPF), 926-571-4 (contains BPA), 931-252-8 (contains BPA), 941-992-3 (contains BPS), 943-503-9 (contains BPA).

- Benzalkonium chloride (CAS No. 63449-41-2).
- Boric acid, borates, and perborates.
- Ethylenediamine tetraacetate (EDTA, CAS No. 6381-92-6) and its salts and Diethylenetriamine pentaacetate (DTPA, CAS No. 67-43-6) and its salts.
- Halogenated and/or aromatic solvents*.
- Homosalate (CAS No. 118-56-9).
- Kojic acid (CAS No. 501-30-4).
- Microplastics, see requirement O6.
- Nanomaterials/-particles, as defined according to the Cosmetic Products Regulation ((EC) No 1223/2009)**.

  Exemptions are made for:

  a) Synthetic amorphous silica (SAS) used as an abrasive in toothpaste.
  b) Titanium dioxide (TiO2) used as a UV-filter approved in SCCS opinion SCCS/1516/13; i.e. TiO2 may not be photocatalytic, coating must be stable and TiO2 may not be included in spray products.
- Nitro musks and polycyclic musk compounds.
- Octocrylene (CAS No. 6197-30-4).
- Organic chlorine compounds, hypochlorous acid and hypochlorite.
- Parabens (4-Hydroxibenzoic acid and its salts and esters).
- PBT and vPvB substances in accordance with REACH Annex XIII, including substances under investigation according to the ECHA PBT assessment list https://echa.europa.eu/pbt/-/dislist/details/0b0236e1889ab857
- Per- and polyfluorinated substances (PFAS).
- Phthalates (i.e., esters of phthalic acid CAS No. 88-99-3).
- Potential or identified endocrine disruptors, according to any of the following EU member state initiative "Endocrine Disruptor Lists":

  List I: https://edlists.org/the-ed-lists/list-i-substances-identified-as-endocrine-disruptors-by-the-eu

  List II: https://edlists.org/the-ed-lists/list-ii-substances-under-eu-investigation-endocrine-disruption

  List III: https://edlists.org/the-ed-lists/list-iii-substances-identified-as-endocrine-disruptors-by-participating-national-authorities

  N.B. A substance which is transferred to one of the corresponding sublists called "Substances no longer on list", and no longer appears on any of List I-III, is no longer excluded. The exception is those substances on sublist II which were evaluated under a regulation or directive which doesn't have provisions for identifying EDs (e.g. the cosmetic products regulation). For those substances, ED properties may still have been confirmed or suspected. Nordic Ecolabelling will evaluate the circumstances case-by-case, based on the background information indicated on sublist II.
- Quaternary ammonium compounds, which are not readily aerobic or anaerobically biodegradable, such as DTDMAC (CAS No. 61789-80-8),

DSDMAC (CAS No. 107-64-2), DHTDMAC (CAS No. 61789-72-8) and DADMAC (CAS No. 7398-69-8).

- Salicylic acid (CAS No. 69-72-7) and its salts (CAS No. 824-35-1 / 18917-89-0 / 59866-70-5 / 54-21-7 / 578-36-9 / 2174-16-5), benzyl salicylate (CAS No. 118-58-1), and ethyl-hexyl salicylate (CAS No. 118-60-5).
- Siloxanes.

  Exemptions are made for linear siloxanes in leave-on products.
- Silver, colloidal silver and nanosilver.
- Substances on the REACH Candidate list of SVHC substances https://www.echa.europa.eu/candidate-list-table
- Titanium dioxide (TiO_2, CAS No. 13463-67-7).

  Exemptions apply for specific products until the appeal case on the CMR classification is settled, which is expected by Q2 in 2025. The following products are included: Product that are not loose powder, in spray form, toothpaste, or lip products (lip balm, lipstick, lip gloss, lipliner, and similar).

  Titanium dioxide in powder form must be added in a closed system, in a suspension or by means of a method that promotes a “low dust” working environment, e.g. using protective equipment which heavily reduces the dust or completely removes the dust from the raw materials (e.g. exhaust ventilation, personal protective equipment and clear safety instructions).
- Triclosan (CAS No. 3380-34-5).

** Solvents are defined as in Commission Directive 1999/13/EC: organic substances with a vapour pressure of at least 0.01 kPa at 20 °C.*

*** Nanomaterials/-particles is defined as insoluble or biopersistent and intentionally manufactured materials with one or more external dimensions or an internal structure in the region of 1-100 nm. Nordic Ecolabelling reserves the right to adopt a newer definition, should the Cosmetic Products Regulation ((EC) No 1223/2009) implement an adjusted definition.*

⇪ Appendix 1 or equivalent declaration completed and signed.

⇪ Appendix 2 or equivalent declaration completed and signed by all raw material manufacturers/suppliers.

O8 Surfactants

All surfactants* in the cosmetic product, irrespective of their function in the product must live up to the following requirements:

- Be readily biodegradable (aerobically) and anaerobically biodegradable.

An exemption for anaerobic biodegradation is made for emulsifiers used in leave-on cosmetics, which only need to be aerobically biodegradable.

- Sodium lauryl sulphate (SLS) is not allowed in toothpaste.

⇪ Reference to the DID-list dated 2023 or later versions. For substances not on the DID-list, or for substances where biodegradation data is missing on the DID-list, biodegradation must be documented according to the guidance in part B of the DID-list and associated data must be presented**.

** Any organic substance, which has surface-active properties, and which consists of one or more hydrophilic and one or more hydrophobic groups of such a nature and size that it is capable of reducing the surface tension of water.*

*** DID-list: "Detergents Ingredients Database" list, see Appendix 7 for a more detailed description of the DID-list, and requirements for analysis laboratory and test methods*

⇪ Appendix 1 or equivalent declaration completed and signed.

⇪ Appendix 2 or equivalent declaration completed and signed by all relevant raw material manufacturers/suppliers.

O9 IFRA

All fragrances in the cosmetic product must be added in line with the IFRA's guidelines. The IFRA's (International Fragrance Association) guidelines can be read at https://ifrafragrance.org/docs/default-source/51st-amendment/ifra-51st-amendment---guidance-for-the-use-of-ifra-standards.pdf?sfvrsn=79750005_2.

⇪ Appendix 1 or equivalent declaration completed and signed.

⇪ Appendix 2 or equivalent declaration completed and signed by all raw material manufacturers/suppliers.

O10 Fragrance free products for babies and children

Fragrance substances/perfumes/flavourings/aromas/fragrance substances in plant extracts must not be added to baby and children's products*.

Exemption: Flavourings are allowed in children's toothpaste, see requirement O21 Oral products: Flavourings, colours, and preservatives.

** Baby/children's products are products that are marketed for or have words such as infant, baby and/or children or pictures of children under the age of 12 years on the label.*

⇪ Recipe.

⇪ Appendix 1 or equivalent declaration completed and signed.

⇪ Label.

O11 Fragrance allergens

All fragrance substances/flavourings/aromas/fragrance substance in plant extract in the cosmetic product must live up to the following requirements:

- Substances with the hazard statement H317 and/or H334 or fragrance allergens listed in Annex III of the Cosmetic Regulation may be included at a maximum of 0.001% (10 ppm) in leave-on products and a maximum of 0.01% (100 ppm) in rinse-off products.

An exemption is made for aromas, provided that they are not classified H317/H334 category 1A:

a) Toothpaste and oral hygiene products for adults can include maximum 6 aromas up to <1000 ppm each in the final product.

b) Children's toothpaste can include maximum 2 aromas up to <1000 ppm each in the final product.

- The following fragrance allergens are prohibited: Oak moss extract (Evernia prunastri, CAS No. 90028-68-5) and tree moss extract (Evernia furfuracea, CAS 90028-67-4).

⇪ Appendix 1 or equivalent declaration completed and signed.

⇪ Appendix 2 or equivalent declaration completed and signed by all relevant raw material manufacturers/suppliers.

⇪ Fragrance allergens list.

O12 Organic colorants

All organic colorants in the cosmetic product must live up to the following requirements:

Must not be bioaccumulative in line with the testing methods in Appendix 7 having a BCF (bioconcentration factor) < 500 or log Kow (logarithmic octanol-water partition coefficient) < 4. Alternatively, the colorant must be approved for use in food.

- Carbon black is prohibited.

⇪ Appendix 1 or equivalent declaration completed and signed.

⇪ Appendix 2 or equivalent declaration completed and signed by all relevant raw material manufacturers/suppliers.

O13 Preservatives

All preservatives in the cosmetic product must be:

- Readily aerobically degradable.
- Not bioaccumulative in line with the testing methods in Appendix 7 having a BCF < 500 or log Kow < 4.

⇪ Reference to the DID-list dated 2023 or later versions. For substances not on the DID-list, or for substances where biodegradation data is missing on the DID-list, biodegradation must be documented according to the guidance in part B of the DID-list and associated data must be presented*.

** DID-list: "Detergents Ingredients Database" list, see Appendix 7 for a more detailed description of the DID-list, and requirements for analysis laboratory and test methods.*

⇪ Appendix 1 or equivalent declaration completed and signed.

⇪ Appendix 2 or equivalent declaration completed and signed by all relevant raw material manufacturers/suppliers.

O14 UV filter

All UV filters in the cosmetic product must live up to the following requirements:

- UV filters may only be added to leave-on products and only to protect the user, not the product.
- All organic UV filters contained in the product must either:
  - Not be bioaccumulative in line with the testing methods in Appendix 7 having a BCF < 500 or log Kow < 4

    or
  - Have a lowest toxicity with NOEC/EC_x > 0.1 mg/l or EC/LC50 > 10.0 mg/l.

Nano UV filters, with exemption to nano TiO_2, are prohibited under requirements O7 Excluded substances.

⇪ Appendix 1 or equivalent declaration completed and signed.

⇪ Appendix 2 or equivalent declaration completed and signed by all relevant raw material manufacturers/suppliers.

O15 Residual monomers in synthetic polymers

For each synthetic polymer in the cosmetic product, the quantity of residual monomers in newly produced polymers and its classifications must be stated. The polymer raw material may not contain more than 100 ppm residual monomer in of each classification listed in the table below.

Table 2 Classification of monomers

Hazard class	Hazard class and category	Hazard code
Carcinogenicity*	Carc. 1A or 1B Carc. 2	H350 H351
Germ cell mutagenicity*	Muta. 1A or 1B Muta. 2	H340 H341
Reproductive toxicity*	Repr. 1A or 1B Repr. 2 Lact.	H360 H361 H362
Respiratory or skin sensitisation	Resp. Sens. 1, 1A or 1B Skin Sens. 1, 1A or 1B	H334 H317
Specific target organ toxicity	STOT SE 1 STOT SE 2 STOT RE 1 STOT RE 2	H370 H371 H372 H373
Acute toxicity	Acute Tox. (oral) 1 Acute Tox. (oral) 2 Acute Tox. (dermal) 1 or 2 Acute Tox. (dermal) 3 Acute Tox. (inhalation) 1 Acute Tox. (inhalation) 2	H300 H301 H310 H311 H330 H331
Endocrine disruption for human health**	ED HH 1 ED HH 2	EUH380 EUH381

** Including all combinations of stated exposure routes and stated specific effect. For example, H350 also covers classification H350i.*

*** Other potential or identified endocrine disruptors, as defined in requirement O7 Excluded substances are also restricted according to this requirement*.

⇪ Appendix 1 or equivalent declaration completed and signed.

⇪ Appendix 2 or equivalent declaration completed and signed by all relevant raw material manufacturers/suppliers.

O16 Aluminium

In the cosmetics product, aluminium (corresponding to % elemental Al) may be present at the maximum concentration limits stated for each product type in the table below.

If a product type is not included in the table, the following maximum limit applies: 17.5%.

Table 3 Maximum concentration limits of aluminium in specific product categories.

Product category	Concentration (%) limits aluminium
After Shave	2.5
Bar Soap	4
Body Lotion	3.81
Body Spray	1.18
Deo Gel	6.18
Deo RollOn	5.63
Deo Stick	7.73
Deo Wipes	0
Deo Spray	4.88
Deo Spray (anti-perspirant)	3.24
Eau de Parfume, Eau de Toilette	0.05
Eye Shadow	43.62
Eyeliner	15.76
Face Moisturizer	10.59
Hair Spray	0.15
Hair Styling	6.7
Hand Cream	0.86
Lip Care Products	0.606
Lip Stick	14.62
Liquid Hand Soap	0.89
Liquid Make Up Foundation	23
Make Up Remover	10.59
Mascara	3.13
Mouthwash	0
Conditioner	7.14
Shampoo	7.14
Shaving Products	0.094
Shower Gel	0.89
Sunscreen Lotion	8.403
Sunscreen Spray	0.332
Talc	2
Toothpaste	3.18

⇪ Formulation and calculation of aluminium content corresponding to elemental Al.

⇪ Appendix 1 or equivalent declaration completed and signed.

⇪ Appendix 2 or equivalent declaration completed and signed by all relevant raw material manufacturers/suppliers.

1.4 Biodegradability and aquatic toxicity

O17 Environmentally hazardous substances (C_{total})

Ingoing substances classified as environmentally hazardous according to Regulation 1272/2008/EEC (C_{total}) in the cosmetic product must not exceed the limits indicated in the table below, when calculated as the total weighted quantity:

$$C_{total} = 100 \cdot C_{H410} + 10 \cdot C_{H411} + C_{H412}$$

C_{H41X} is the fraction of the product, measured in percentage by weight, made up of the H410, H411 or H412 classified substances.

Ingoing substances must not be classified with the hazard code H410 if the associated multiplying factor M (as described in the CLP Regulation (EC) No 1272/2008) > 1 according to requirement O5 Classification of ingoing substances.

For concentrated products, which must be mixed with water by the consumer before use, the calculation is carried out on the use solution.

Table 4 Limit values for total weighted quantity of environmental hazards

Type of product	C_{total} (wt. %)
Soap rinse-off products (Soap, shower gel, shampoo etc.)	14.0
Other rinse-off products	8.0
Leave-on products	4.0

⇪ Calculation of the weighted quantity (percentage by weight) of H410, H411, and H412 classified substances. If data is missing on a substance, it is assessed according to a worst-case scenario (H410). Nordic Ecolabelling's calculation sheet for cosmetic products can be used.

⇪ Appendix 1 or equivalent declaration completed and signed.

⇪ Appendix 2 or equivalent declaration completed and signed by all raw material manufacturers/suppliers.

Rinse-off products

O18 aNBO (aerobic non-biodegradable organics) and anNBO (anaerobic non-biodegradable organics)

Ingoing substances in the cosmetic product must not exceed the limits indicated in the table below. For foam soap it is permitted to choose between applying the limits per active content or per dose. The unit used shall be the same as in O19 CDV.

Surfactants must be readily aerobic biodegradable and anaerobic biodegradable, see requirement O7 Surfactants.

Exemption to the definition of ingoing substances and impurities: Impurities in raw material ≤ 1.0 w% will not be included in calculations.

For concentrated products, which must be mixed with water by the consumer before use, the calculation is carried out on the use solution.

Table 5 Limit values for aNBO and anNBO

Type of product	aNBO (mg/g AC*)	anNBO (mg/g AC*)
Solid hand soap, shampoo bar, conditioner bar, shower bar.	5	5
Other rinse-off products	14	14

Type of product	aNBO (mg/dose**)	anNBO (mg/dose**)
Foam soap	2.5	2.5

** Active content (AC) refers to the amount (weight) of all organic substances in the product excluding the water content of the ingredients. Abrasives in handwash and exfoliants are not included. However, see requirement O6 on Microplastics.*

*** One dose = the quantity dispensed per full depression by the dispenser or pump supplied with/designed for the product. If the product is not sold with a particular dispenser, a standardised dose of 0.75 g is used.*

⇪ Calculation of the quantity (mg) of aNBO and anNBO/g AC or mg/dose for the product. Nordic Ecolabelling's calculation sheet for cosmetic products can be used.

Reference to the DID-list 2023 or later versions. For substances not on the DID-list, or substances where biodegradation data is missing on the DID-list, the parameters must be calculated based on the guidance in part B of the DID-list and associated documentation must be presented.*

** DID-list: "Detergents Ingredients Database" list, see Appendix 7 for a more detailed description of the DID-list, and requirements for analysis laboratory and test methods.*

O19 Critical dilution volume (CDV)

The Nordic Swan cosmetic product's critical dilution volume (CDV) must not exceed the threshold values in the table below. CDV is calculated according to the formula:

$$CDV_{chronic} = \Sigma(DF_i \cdot C_i / TF_i \text{ (chronic)})$$

DF_i is the degradation factor for substance i.
C_i is the amount in l of substance i per g active content or per dose
TF_i is the toxicity factor for substance i.
For foam soap it is permitted to choose between applying the limits per active content or per dose. The unit used shall be the same as in O18 aNBO and anNBO.

For concentrated products, which must be mixed with water by the consumer before use, the calculation is carried out on the use solution.

Exemptions to the definition of ingoing substances and impurities: Impurities in raw material ≤ 1.0 w% will not be included in calculations.

Table 6 Limit values for CDV

Type of product	$CDV_{chronic}$ (l/g AC*)
Solid hand soap, shampoo bar, conditioner bar, shower bar.	2000
Liquid conditioner, hair mask, and other conditioning products	10000
Other rinse-off products	7000

Type of product	$CDV_{chronic}$ (l/dose**)
Foam soap	1000

** Active content (AC) refers to the amount (weight) of all organic substances in the product excluding the water content of the ingredients. Abrasives in handwash and exfoliants are not included. However, see requirement O6 on Microplastics.*

*** One dose = the quantity dispensed per full depression by the dispenser or pump supplied with/designed for the product. If the product is not sold with a particular dispenser, a standardised dose of 0.75 g is used.*

⇪ Calculation of the $CDV_{chronic}$ l/g AC or l/dose for the product. Nordic Ecolabelling's calculation sheet for cosmetic products can be used.

Reference to the DID-list 2023 or later versions. For substances not on the DID-list or for which data is missing on DID-list, the parameters must be calculated based on the guidance in part B of the DID-list and associated documentation must be presented*. If chronic values are available, they must be used instead of acute ones.

** DID-list: "Detergents Ingredients Database" list, see Appendix 7 for a more detailed description of the DID-list, and requirements for analysis laboratory and test methods*.

Leave-on products

O20 Biodegradability and aquatic toxicity

At least 96% by weight of the total content of organic ingoing substances in the cosmetic product must be:

- Readily biodegradable (OECD 301 A-F), and/or
- Lowest aquatic toxicity NOEC/ECx > 0.1 mg/l or EC/LC50 > 10.0 mg/l and not be bioaccumulative (log Kow < 4 or BCF < 500), and/or
- Lowest aquatic toxicity NOEC/ECx > 0.1 mg/l or EC/LC50 > 10.0 mg/l and be potentially biodegradable (OECD 302 A-C) and/or
- Lowest aquatic toxicity NOEC/ECx > 0.1 mg/l or EC/LC50 > 10.0 mg/l and not be bioavailable (molar weight > 700g/mol).

Exemptions to the definition of ingoing substances and impurities: Impurities in raw material ≤ 1.0 w% will not be included in calculations.

UV filters are exempted.

Surfactants must be readily aerobic biodegradable and anaerobic biodegradable, see requirement O8 Surfactants.

Please note that the requirement does not apply to products containing 100% inorganic raw materials.

⇪ Calculation of the quantity (percentage by weight) of substances that fulfil the listed requirements. Nordic Ecolabelling's calculation sheet for cosmetic products can be used.

Reference to the DID-list 2023 or later versions. For substances not on the DID-list or for substances where biodegradation data is missing, the parameters must be calculated based on the guidance in part B of the DID-list and associated documentation must be presented*. If chronic values are available, they must be used instead of acute ones.

** DID-list: "Detergents Ingredients Database" list, see Appendix 7 for a more detailed description of the DID-list, and requirements for analysis laboratory and test methods*.

1.5 Specific additional requirements relating to certain product types

Lip products, toothpaste, oral hygiene products, and nipple cream

O21 Flavourings, colours, preservatives, and mineral oil

Ingoing substances in lip product, toothpaste, oral hygiene product, and nipple cream must live up to the following requirements:

- Flavourings must be approved for use in foodstuff under Regulation (EC) No 1334/2008.

- Colours and preservatives must be approved for use in foodstuff under Regulation 1333/2008.
- Mineral oil saturated hydrocarbons (MOSH, CAS No. 64742-65-0) and mineral oil aromatic hydrocarbons (MOAH, CAS No. 64742-82-1) in lip care products must comply with the recommendations by Cosmetic Europe for mineral oils: https://cosmeticseurope.eu/download/N08vNnB0TUhMbWpwQmlqVk9UZzdwZz09

⇧ Appendix 1 or equivalent declaration completed and signed.

⇧ Appendix 2 or equivalent declaration completed and signed by all relevant raw material manufacturers/suppliers.

⇧ Specification of FL-number for flavourings and E-number for colours and preservatives. Appendix 2 can be used.

O22 Fluoride/hydroxyapatite and zinc salts in toothpaste and mouthwash

Ingoing substances in toothpaste and mouthwash must live up to the following requirements:

- Toothpaste and mouthwash products must contain fluoride or hydroxyapatite in concentrations that comply with national recommendations.
- Water-soluble Zinc salts in mouthwash is only allowed up to 0,1%.

⇧ Recipe.

⇧ Appendix 1 or equivalent declaration completed and signed.

Decorative cosmetics and hair dyes

O23 Heavy metals in colourants

Traces of the following heavy metals cannot exceed the following limits in decorative cosmetic product or hair dye product:

- Arsenic 1 ppm
- Antimony 1 ppm
- Cadmium 1 ppm
- Chromium 10 ppm
- Cobalt 1 ppm
- Lead 1 ppm
- Mercury 1 ppm
- Nickel 10 ppm

Colours that are approved for use in food in Regulation 1333/2008 may be used without further documentation of the metals listed above.

In addition, the following requirement applies to decorative cosmetics:

- Bismuth Oxychloride (CAS No. 7787-59-9) is prohibited.

⇧ Analysis results and/or material specification of the colourant.

⇧ Appendix 2 or equivalent declaration completed and signed with calculations of the amount of the specific metals in the cosmetic product.

⇪ Alternatively, test report showing that the quantities in the cosmetic product meet the requirement.

⇪ Specification of E-number for colorants approved for food. Appendix 2 can be used.

O24 Hair dyes

The following hair dyes are prohibited in hair dye product:

- Lawsone (CAS No. 83-72-7)
- Hydroxypropyl p-phenylenediamine and its dihydrochloride salt (CAS No. 928659-47-5 and CAS No. 73793-79-0)
- Hair dyes judged to be sensitising and/or allergenic by the SCCS is prohibited even if they do not meet the classification of H317 and/or H334

⇪ Appendix 1 or equivalent declaration completed and signed.

⇪ Appendix 2 or equivalent declaration completed and signed by all relevant raw material manufacturers/suppliers.

Wet Wipes

O25 Wipe material

Wipe carrier material used in wet wipes must live up to the following requirements:

- Must not be based on fossil raw materials and must be plastic free. Chemically modified natural polymers, and biodegradable/bio-based plastics are also considered plastic, as specified in the guidelines on the Single-Use Plastic directive[3].
- Wipe carrier material or fibre type must meet relevant requirements under one (not all) of the criteria documents listed in the table below. For cellulose-based pulp and fluff pulp used in carrier material of wipes, the requirements in the Appendix 8 can also be applied.

Table 7 Requirements for wipe carrier material.

Wipe carrier material	EU Ecolabel, Absorbent hygiene products 2023/1809/EU	Nordic Swan Ecolabel, Textiles version 5.4 or later	Nordic Swan Ecolabel, Tissue paper version 6.0 or later	EU Ecolabel Tissue paper 2019/70/EU
Regenerated cellulose*	Criterion 2,7	Fibres must be licenced or fulfil requirements O23-O27 O30-O31 O33-O41	***	***
Cellulose-based pulp/fluff pulp**	Criterion 1,7	***	***	***

[3] Commission guidelines on single-use plastic products in accordance with Directive (EU) 2019/904 of the European Parliament and of the Council on the reduction of the impact of certain plastic products on the environment (2021/C 216/01)

Cotton and other natural cellulosic fibres	Criterion 3,7	Fibres must be licenced or fulfil requirements O14 O30-O31 O33-O41	***	***
Flax, bamboo, hemp and bast fibres	***	Fibres must be licenced or fulfil requirements O16-O17 O30-O31 O33-O41	***	***
Tissue paper made off cellulose-based pulp	***	***	Paper must be licenced	Paper must be licenced

** Regenerated cellulose fibres, also known as man-made cellulose fibres, means fibres produced from the raw material cellulose which include viscose, modal, lyocell, cupro and triacetate.*
*** For cellulose-based pulp and fluff pulp, the requirements in the Appendix 8 can be applied as an alternative to the mentioned criteria documents in the table. Nordic Ecolabelling reserves the right to adjust the requirements according to the criteria for Nordic Swan Ecolabel Sanitary Products, generation 7 when they are implemented.*
**** The criteria document is not applicable to the material type, select another of the alternative criteria documents.*

⇪ If wipe carrier material or fibre type is licenced or used in a licenced product, valid licence number must be stated. Otherwise, documentation for the relevant requirements in the chosen criteria document must be provided.

O26 Process water

Sensitising substances with H317 and/or H334 can be used in the process water of the wet wipe material production only if the concentration in the carrier material/wipe is < 0.10 ppm per sensitising substance.

⇪ Signed declaration of the use of sensitising substances in the process water for material in wet wipes. Appendix 3 can be used.

⇪ If sensitising substances are used, an analysis report is to be enclosed showing < 0.10 ppm for each sensitising substance.

O27 User information

Wet wipes must be marked on the packaging with the following information:

- “Do not flush” pictogram defined in guidelines for the EU Single-Use Plastic (SUP) Directive or corresponding pictogram

⇪ Product label.

Sunscreen products

O28 Efficacy and UV protection claims

The efficacy of sunscreen product's protection against UVB and UVA radiation must comply with the EU Commission Recommendation (2006/647/EC), Section 3 Minimum efficacy:

- UVB protection of minimum SPF 6
- UVA protection factor of minimum 1/3 of UVB SPF
- Critical wavelength of minimum 370 nm

Test methods

The test methods used to verify the efficacy shall be among those established by the European Committee for Standardization (CEN). The methods currently include:

- EN ISO 24444:2020 "Cosmetics - Sun protection test methods - In vivo determination of the sun protection factor (SPF) (ISO 24444:2019)"
- EN ISO 24443:2021 "Cosmetics - Determination of sunscreen UVA photoprotection in vitro (ISO 24443:2021, Corrected version 2022-02)"
- EN ISO 24442:2022 "Cosmetics - Sun protection test methods - In vivo determination of sunscreen UVA protection (ISO 24442:2022)"
- EN ISO 23675:2024 "Cosmetics - Sun protection test Methods - In Vitro determination of Sun Protection Factor"
- EN ISO 23698:2024 "Cosmetics - Measurement of the sunscreen efficacy by diffuse reflectance spectroscopy"

Labelling

The labelling of the sunscreen product must comply with Section 4 Simple and meaningful claims of efficacy:

- Claims indicating the efficacy shall be simple, unambiguous, meaningful, and coherent with the results from the above-mentioned efficacy testing of the product.
- Claims on the protection efficacy shall be indicated by categories “low”, “medium”, “high”, “very high”, according to the SPF intervals tabled in the Commission Recommendation.
- The claimed SPF shall be one of the “labelled sun protection factor” tabled in the Commission Recommendation, in accordance with the results of the efficacy testing.
- The protection efficacy category shall be indicated at least as prominently as the SPF.

⇪ Test reports including description of the tests methods used and the results obtained.

⇪ Product label.

Products outside the scope of the cosmetic products regulation

O29 Animal care products

Animal care product must live up to the following requirements:

- Fragrance and colourants are prohibited
- The product shall comply with the following parts of the EU regulation on cosmetic products ((EC) No 1223/2009):
  - Article 14 Restrictions for substances listed in the Annexes
  - Article 15 Substances classified as CMR substances
  - Article 19 Labelling

    - Article 20 Product claims
- The product must not be classified as hazardous to the aquatic environment corresponding to any of the codes H400, H410, H411, H412 or H413, according to the EU CLP regulation ((EC) No 1272/2008).

⇪ Safety data sheet (MSDS) of the product in accordance with the EU REACH regulation ((EC) No 1907/2006, Annex II).

⇪ Appendix 1 or equivalent declaration completed and signed.

⇪ Product label.

O30 Sex lubricants

Sex lubricant product must live up to the following requirements:

- Fragrance and colourants are prohibited
- The product shall comply with the following parts of the EU regulation on cosmetic products ((EC) No. 1223/2009):
    - Article 3 Safety
    - Article 8 Good manufacturing practise
    - Article 10 Safety assessment
    - Article 14 Restrictions for substances listed in the Annexes
    - Article 15 Substances classified as CMR substances
    - Article 19 Labelling
    - Article 20 Product claims
- The safety assessment must be conducted by a specialist with documented qualifications required for cosmetic product safety assessment. Additionally, in case the product manufacturer doesn't manufacture cosmetic products, the safety assessor must be an independent third party.
- The product must not be classified as hazardous to the aquatic environment corresponding to any of the codes H400, H410, H411, H412 or H413, according to the EU CLP regulation ((EC) No 1272/2008).

In cases where the product is within the scope of the EU regulation on medical devices (MDR, (EU) 2107/745)), compliance with it must be shown. The product then doesn't need to comply with articles 3, 8, and 10 of the cosmetic products regulation.

⇪ Safety data sheet (MSDS) of the product in accordance with the EU REACH regulation ((EC) No 1907/2006, Annex II) (not for products within the scope of the MDR).

⇪ Safety assessment report and declaration of the qualifications of the safety assessor (not for products within the scope of the MDR).

⇪ EU declaration of conformity with the MDR (only for products within the scope of the MDR).

⇪ Appendix 1 or equivalent declaration completed and signed.

⇪ Product label (with CE conformity mark if the product is within the scope of the MDR).

O31 Medical examination lubricants

Medical lubricant product must live up to the following requirements:

- Fragrance and colourants are prohibited
- The product shall be within the scope of, and compliant with, the EU regulation on medical devices (MDR, (EU) 2017/745)
- The product shall comply with the following parts of the EU regulation on cosmetic products (CPR, (EC) No 1223/2009) (where the CPR is stricter than the MDR, the former applies):
  - Article 14 Restrictions for substances listed in the Annexes
  - Article 15 Substances classified as CMR substances
  - Article 19 Labelling
  - Article 20 Product claims

⇪ EU declaration of conformity from the notified body, in accordance with the MDR.

⇪ Appendix 1 or equivalent declaration completed and signed.

⇪ Product label, with CE conformity mark.

1.6 Packaging requirements

Packaging and recycling of packaging materials is a focus area in society today. Nordic Ecolabelling wants to set strict requirements on packaging to reduce the material consumption and transport of packaging and air, and to ensure good possibilities for recycling, in order to support material recovery and circular economy.

The packaging requirements target the primary packaging and it's recyclability. Only the packaging materials described in requirement O32 Packaging and materials can currently be used. If you are interested in another packaging type (or e.g., another label type), please contact Nordic Ecolabelling to find out whether the criteria can be extended to include your format.

The recyclability of a plastic packaging can be documented with a Recyclability rate certificate from RecyClass showing that the packaging is fully recyclable with a minimum recyclability score of B. See requirements O33 and O36 for further information.

Concentrated products (refills)
For concentrated products sold as refills, which are to be mixed with water by the user to form the finished product, both the main packaging and the refill packaging must meet the packaging requirements.

If the concentrated product is not sold with a refill packaging, but the label or other communication refers to a specific packaging that should be used for dilution, then this packaging must meet the packaging requirements.

If the packaging format, in which the product is to be diluted, is not specified then the packaging requirements only apply to the main packaging of the concentrated product.

O32 Packaging and materials

The following material types may be used in primary packaging*:

- Plastic (see requirement O33)
- Paper-based, e.g. cardboard and corrugated board and cardboard packaging for liquid products (see requirements O34 and O35 respectively)
- Glass containing ≥ 50% recycled material*

Small glass parts in packaging components are not required to be made of recycled material

- Aluminium can be used only for the following types of products, if the container does not contain layers or parts of other types of metals than aluminium, is based on > 99.5% pure aluminium and contains ≥ 60% recycled* aluminium:
  - Product sizes ≤ 100 ml
  - Spray bottles/propellant bottles for hairstyling products and shaving foam in all sizes

The following packaging and material types must not be used:

- Miniature liquid products (≤ 100 ml) sold to the HoReCa sector*.
- Metal

  Exemptions for:
  - Aluminium for the product types described above
  - Small metal parts, e.g. parts of a pump or trigger spray and metal ball in propellant bottles (small parts of aluminium are not required to be made of recycled material).
  - Sealing foil across small openings on e.g. tubes, are permitted up to 1% of the total weight of the packaging
  - Decorative cosmetics up to 15% of the total weight of the packaging. Mirrors are not permitted as part of the packaging

** See list of definitions in section 1.2 of the document.*

⇪ Specification of materials, including description of all components (cap, pump, lid, etc.). Appendix 4 Declaration from the manufacturer/supplier(s) of the primary packaging component can be used as part of the documentation.

⇪ Declaration from the applicant that products with a volume lower than 100 ml is not sold to the HoReCa sector. Appendix 1 can be used.

⇪ If primary packaging of aluminium: Declaration that no other metals or alloys are used. Appendix 4 can be used.

⇪ If decorative cosmetic: Account of the content of metal in packaging for decorative cosmetics. Appendix 4 can be used.

O33 Plastic packaging: Design for recycling

The primary packaging must have a design that enables material recovery. For label requirements, see O36. All other components must live up to the following requirements:

Separability

All components* of the packaging of products for domestic use** that are comprised of different materials must be possible to be sorted separately without using a tool (including sorting into different plastic types). Mixed materials that cannot be separated must not be used.

Containers with a thread neck are considered separable and no further documentation is required.

An exemption is made for:

- Sealing foil made of plastic across openings on e.g. tubes and jars
- Small metal, glass or plastic parts in pumps
- Pressurised containers
- Airless containers
- Roll-on
- Packaging for decorative cosmetic products

** See list of definitions in section 1.2 of the document.*
*** Please note that professional products are not considered for domestic use, and are thus exempted from the requirement on separability.*

Materials

The individual components of the plastic packaging must be made from either:

- ≥ 99% polyethylene (PE) or ≥ 95% polypropylene (PP) with a density < 0.97 g/cm^3.
  The remaining material must not be biodegradable or of any other material than PE or PP,

  or

- ≥ 98% polyethylene terephthalate (PET).

Exemptions:

- Sealing foil across openings on e.g. tubes and jars can be made of plastic laminate.
- Small metal or glass parts in pumps and trigger sprays (e.g. springs).
- Spray or pump nozzles may contain other plastics if they have a density > 1.0 g/cm^3 (PVC and other halogenated plastics are not allowed).
- Closures used on refill deodorants, or similar liquid products that is refilled from the bottom, may include membrane composed of nitril rubber (NBR) with a density < 0.95 g/cm³ for containers of PET and with a density > 1.0 g/cm^3 for containers of PE and PP.
- Closures used on squeezeable upside down bottles may include a membrane composed of floating silicone with a density < 0.95 g/cm³ for containers of PET and with a density > 1.0 g/cm^3 for containers of PE and PP. Any silicone used with this exemption must contain less than 1000 ppm of D4, D5, and D6. The packaging must also attain a minimum recyclability score of B, as verified by a recyclability rate certificate by RecyClass.

Barriers

For packaging components of PE, PP or PET: Only EVOH and SiOx with a compatible binder matching the components material (PE, PP or PET), are allowed.

If the binder does not match that of the component, the respective material impurity limits apply (≥ 99% PE, ≥ 95% PP and ≥98% PET).

Colours

- For packaging components of PE/PP: Colours without carbon black pigments are allowed.
- For packaging components of PET: Only transparent or transparent colours without carbon black pigment are allowed.
  Exemption: Opaque colours may be used for oil-based products containing unsaturated and/or polyunsaturated fatty acids.

Surface treatment with PFAS

The primary packaging must not be surface treated with PFAS, either on the inside or on the outside of the packaging.

⇪ A picture/description of how the packaging's components of different materials can be separated without using tools. Alternatively, if the packaging has a threadneck this can be documented in Appendix 4.

⇪ Packaging specifications or certificate for each component, showing the materials used, density of PE or PP components, any barriers used and which pigments have been added. Appendix 4 filled out by the manufacturer/supplier can be used or a Recyclability rate certificate from RecyClass showing that the packaging is fully recyclable with a minimum recyclability score of B.

⇪ Closure on squeezeable upside down bottle with membrane of silicone:

- Documentation showing that the density of the silicone is less than 0.95 g/cm^3 for containers of PET or more than 1.0 g/cm^3 for containers of PE or PP, and that the total content of D4, D5 and D6 is less than 1000 ppm. Appendix 4 can be used.
- Recyclability rate certificate from RecyClass showing that the packaging is fully recyclable with a minimum recyclability score of B.

⇪ Closures on refill deodorants, or similar products with membrane of NBR:

- Documentation showing that the density of the nitril rubber (NBR) is less than 0.95 g/cm^3 for containers of PET or more than 1.0 g/cm^3 for containers of PE or PP. Appendix 4 can be used.

⇪ Declaration that the packaging has not been treated with PFAS. Appendix 4 can be used.

O34 Paper-based packaging: Recycled material and design for recycling

To enable recycling of the cardboard and corrugated board packaging, the following is required:

- Cardboard packaging must contain at least 90% paper/paperboard.
- A minimum of 75% by weight of the wood raw material that is used in the paper/cardboard must be made of recycled material*.
- The remaining proportion of wood raw material (that is not recycled material) must be covered by the FSC/PEFC** control schemes (FSC controlled wood/PEFC controlled sources).
- Two-sided plastic laminate is not permitted.

- PVC or plastic based on other types of halogenated plastics must not be used in the packaging (container and closure).
- Solid coloured cardboard is not permitted, except for white solid coloured cardboard, which is permitted.

** See list of definitions in section 1.2 of the document.*

*** (Forest Stewardship Council/ Programme for the Endorsement of Forest Certification).*

⇪ Description of the packaging from the packaging producer showing the following. Appendix 4 can be used:

- Percentage (by weight) of paper/paperboard material, and percentage of recycled material in wood raw material
- Percentage (by weight) of any barrier material; material type and description showing whether the barrier is one- or two-sided
- Percentage (by weight) of other materials that might be present in elements such as closure, handles etc. and material type.

⇪ Declaration that any non-recycled wood raw material is covered by the FSC/PEFC control schemes.

⇪ Declarations that two-sides laminate and PVC and other plastic based on other types of halogenated plastics has not been used. Appendix 4 can be used.

O35 Cardboard packaging for liquid products: Sustainable material and design for recycling

Beverage carton packaging that is Nordic Swan Ecolabelled according to the criteria for Nordic Ecolabelling for Packaging for Liquid Foods can be used without further documentation of requirement O35.

- Cardboard packaging for liquid products must contain at least 60% paper/paperboard.
- At least 90% by weight of the primary packaging must be made of bio-based material* or post-consumer/commercial recycled material (PCR)* or a combination of these. A mass balance approach is permitted.
- Paper/paperboard:
  - A minimum of 70% of the wood raw material that is used in the paper/cardboard must originate from forestry certified under the FSC or PEFC schemes, or the raw material can be recycled (PCR)*, or a combination of the two.
  - The remaining proportion of wood raw material must be covered by the FSC/PEFC control schemes (FSC controlled wood/PEFC controlled sources).
- For bio-based* plastic:
  - Palm oil and soy cannot be used as a raw material.
  - Sugar cane raw material must be certified according to a standard that meets Nordic Ecolabelling’s requirements for raw material standards. This requirement does not apply for secondary raw materials*.
- PVC or plastic based on other types of halogenated plastics must not be used.
- Labels are not permitted.

- Direct printing on the packaging must only be done with water-based inks.

** See list of definitions in section 1.2 of the document.*

⇪ Description of the packaging from the packaging producer showing percentage (by weight) of paperboard material, barrier material (material type, whether it is bio-based or PCR and percentage) and other elements such as closure (material type, whether it is bio-based or PCR and percentage). Appendix 5 can be used.

⇪ The producer of the packaging shall document, for instance based on invoice or delivery note, that the requirement of minimum 70% certified paper/paperboard is purchased on a yearly basis, and that the remaining proportion is covered by the FSC/PEFC control schemes.

⇪ Calculation showing that the requirement for the proportion of bio-based or recycled material in the primary packaging is fulfilled. Appendix 5 can be used.

⇪ Declaration that palm oil and soy has not been used. Appendix 5 can be used.

⇪ For sugar cane: Copy of valid CoC certificate or certification number. The CoC certificate holder shall declare that all sugar cane used in the plastic for the cardboard packaging that is used for the cosmetic product is certified according to a specified standard. The standard must meet Nordic Ecolabelling's requirements for raw material standards. A mass balance approach is permitted.

⇪ Declarations that PVC and other plastic based on other types of halogenated plastics has not been used. Appendix 5 can be used.

⇪ Declarations that aluminium and other metals has not been used. Appendix 5 can be used.

⇪ For packaging that is Nordic Swan Ecolabelled according to the criteria for Nordic Ecolabelling for Packaging for Liquid Foods: Please state the Nordic Swan Ecolabel licence number.

O36 Labels and print for all packaging materials: Design for recycling of packaging

To enable recycling of the packaging, the following is required for labels*:

Label material

- Packaging made from polyethylene (PE) and polypropylene (PP): The label must be of the same material as the packaging.

  Exemption: Cross-over labels of PP.

- Packaging made from polyethylene terephthalate (PET):
  - The label must be of PP or PE with a density < 1.00 g/cm^3.

    An exemption is made for oil-based products containing unsaturated and/or polyunsaturated fatty acids, where labels of PET (not PET-G, cPET or foamed PET) are permitted.
  - The label must not cover more than 50% of the packaging surface for sizes ≤ 500 ml and 70% for sizes > 500 ml.**
- Paper/cardboard packaging: The label must be of paper. The label glue must be water soluble.
- Aluminium and glass: No requirement on labels

Print

- Printing inks for plastic packaging must be compliant with EuPIA exclusion policy***.
- Direct print on the container is not permitted except for date codes, batch codes and UFI (Unique Formula Identifier).

  Exemption: Tubes, flexible plastic pouches, paper-based packaging and containers made from aluminium**.**

** Label means "traditional label", shrink film label/sleeve etc.*

*** Instructions and example calculations can be found in section 1 of appendix 6.*

**** https://www.eupia.org/wp-content/uploads/2024/03/20240313-EuPIA_Exclusion_Policy_for_Printing_Inks_and_Related_Products_-March-2024_6th-Edition-v1-1.pdf*

⇪ Label specifications showing the material used and density. Appendix 4 can be used or a Recyclability rate certificate from RecyClass showing that the packaging is fully recyclable with a minimum recyclability score of B.

⇪ For labels on PET packaging: Calculation of label size compared to the surface of the container. Nordic Ecolabelling's calculation sheet for the packaging can be used.

⇪ For labels on paper/cardboard packaging: Specification from the manufacturer showing that the label is made of paper and that the adhesive is water soluble. Appendix 4 can be used.

⇪ Declaration from the applicant that direct print is not used except for date codes, batch codes and UFI. Appendix 1 can be used.

O37 Amount of packaging: Weight-Utility Ratio (WUR)

To limit the use of an unnecessarily large amount of material, the primary packaging must meet the following calculation. More detailed information and calculation examples can be found in Appendix 6.

$$\frac{\sum(mf_i \cdot W_{material\_i})}{t} \leq a \cdot Vol_{product} + b$$

mf_i = Material factor for type of material divided into the following three materials:

$mf_{paper/cardboard}$ = 0.4

$mf_{plastic}$ = 1.0

$mf_{plastic\ laminate}$ = 1.0

$mf_{aluminium}$ = 2.1

mf_{glass} = 0.6

$W_{material\ i}$ = Weight of the packaging component (including label) in grams

t = Reuse factor (t=1 for packaging, which is not reused for the same purpose, t > 1 if the product is sold with a refill or for the purpose of multiple refills, e.g. t = 5 if the amount of refills is 4.)

$Vol_{product}$ = Volume of the product in ml

a and b are constants that vary for different packaging types:

Packaging type	a	b
Regular pump bottle	0.05	28
Foam pump bottle	0.035	52
Airless packaging	0.36	19
Tube	0.1	7.5
Bottle	0.065	15
Jar	0.08	35
Stick + roll on	0.5	9
Wet wipes*	0.098	8
Propellant bottles	0.4	10
Solid soaps, shampoo etc.	0.025	0.4
Diverse	0.013	15

For decorative cosmetics** the following applies:

$$\frac{\sum W_{packaging,i}}{W_{product,total}} \leq 0.9$$

$W_{packaging,\ i}$ *= the weight of the packaging component i*

$W_{product,\ total}$ *= the weight of the end product (packaging plus content)*

For concentrated products sold as refills, both the main dispensing packaging and the refill packaging must be included in the WUR calculation. If the packaging format, in which the product is to be diluted, is not specified then the WUR requirements only apply to the main packaging of the concentrated product. For a definition of "main packaging" and "refill packaging", please see the list of definitions in section 1.2.

** Wet wipes use the same equation as above, but volume of the product is replaced by the number of wet wipes in the packaging.*

*** Decorative cosmetics are mascara, eye liner, eye primer, eyebrow pencil, eyeshadow, powder/blusher, foundation, concealer, primer, nail varnish, lipstick, lip gloss and similar products.*

⇪ Packaging specifications (including all components, such as container and closure (cap, spray nozzle etc), label etc.) or certificate showing the materials used, component weights. Appendix 4 can be used together with a technical data sheet.

⇪ Calculation of weight-utility ratio (WUR). Nordic Ecolabelling's calculation sheet for the packaging can be used.

⇪ If t >1: Documentation in the form of sales statistics or similar showing how many refills are sold per original packaging.

O38 Dosability/Dosing systems and emptying level

To avoid over-dosing, the following is required:

- For liquid hand soap, no pump or dispenser sold with the product may provide more than 2 g soap per full press
- The following products must have an emptying level* of 90% or be able to be taken apart without tools in order to be able to empty the packaging further:
  - Bottles for conditioner and cream
  - Bottles with a pump, incl. dispenser bottles and bag-in-box dispenser systems

Pump products with an "airless" system are exempted from this requirement.

** Emptying level must be calculated according to the formula and taking into account the emptying methods in Appendix 6.*

⇧ For liquid hand soap: Description of dosing system and weighing results per full press or specification for the pump showing the amount in ml per full press.

⇧ For conditioner and cream bottles, bottles with a pump, incl. dispenser bottles, and bag-in-box products: Documentation of emptying level in accordance with Appendix 6 or a picture/description of how the lid/pump can be taken apart without tools.

1.7 Disposal information requirements

Correct disposal of cosmetic products is an important factor in reducing the environmental impact.

O39 Disposal information

- All cosmetic products must have a label that includes the correct pictogram(s) in accordance with the common Nordic system of waste symbols, showing how the packaging should be sorted by the consumer. See details in the design guidelines for packaging: Unified pictogram system for recycling[4]. For products that are not sold in the nordic countries, national symbols or phrases can be used instead.
- The product types mentioned in the table below must bear the texts stated or equivalent information/pictogram on the label:

Table 8 Consumer information on label

Product	Cleansing lotion	Eye make-up remover	Nail polish	Nail polish remover	Aerosol spray cans
"Do not discard cotton wool or paper carrying this product in the lavatory or drain. Dispose in a waste bin instead" *Or* "Cleanse with a reusable pad"	X	X			
"Do not discard cotton wool or paper carrying this product in the lavatory or drain. Dispose in a waste bin instead"				X	
"Do not discard product in the lavatory, drain or waste bin. Please leave at a collection point for hazardous waste instead"			X	X	

[4] Design guidelines for packaging: Unified pictogram system for recycling: https://www.eupicto.com/media/khlbx4hb/eupicto_design-guidelines-for-packaging_final-5-skrivskyddad.pdf

"Do not discard product in a waste bin. Please leave at a collection point for hazardous waste instead"					X

⇪ Product label.

1.8 Licence maintenance

The purpose of the licence maintenance is to ensure that fundamental quality assurance is dealt with appropriately.

O40 Customer complaints

The licensee must guarantee that the quality of the cosmetic product does not deteriorate during the validity period of the licence. Therefore, the licensee must keep an archive over customer complaints. Note that the original routine must be in one Nordic language or in English.

⇪ Routine for handling and archiving customer complaints.

O41 Traceability

The licensee must be able to trace the cosmetic product in the production. A manufactured / sold product should be able to trace back to the occasion (time and date) and the location (specific factory) and, in relevant cases, also which machine / production line where it was produced. In addition, it should be possible to connect the product with the actual raw material used.

You can upload your company's routine or a description of the actions to ensure traceability in your company.

⇪ Traceability routine or a procedure description.

Regulations for the Nordic Ecolabelling of products

When the Nordic Swan Ecolabel is used on products the licence number shall be included.

More information on graphical guidelines, regulations and fees can be found at www.nordic-swan-ecolabel.org/regulations

Follow-up inspections

Nordic Ecolabelling may decide to check whether the products fulfil Nordic Ecolabelling requirements during the licence period. This may involve a site visit, random sampling, or similar test.

The licence may be revoked if it is evident that the product does not meet the requirements.

Random samples may also be taken in-store and analysed by an independent laboratory. If the requirements are not met, Nordic Ecolabelling may charge the analysis costs to the licensee.

Criteria version history

Nordic Ecolabelling adopted version 4.0 of the criteria for cosmetic products 04 November 2024. The criteria are valid until 28 February 2030.

On 18 March 2025 Nordic Ecolabelling adopted an adjustment of requirement O33 Plastic packaging: Design for recycling by expanding the exemption for membranes of silicone in closures on PET containers to also include PE and PP containers.

The new version is called 4.1.

On 13 May 2025 Nordic Ecolabelling adopted an adjustment of requirement O27 User information (on wet wipes) by allowing corresponding pictorgrams to be used and removed the requirement that the pictogram must be placed on the front side of the packaging.

On 20 May 2025 Nordic Ecolabelling adopted an adjustment of requirement O6 Microplastics, where a complete exemption to the requirement is introduced for sunscreen products. The exemption is valid until the 29 October 2029.

On 27 May 2025 Nordic Ecolabelling adopted an adjustment of requirement O36 Labels and print for all packaging materials: Design for recycling of packaging, where an exemption is introduced allowing PET labels (not PET-G, cPET or foamed PET) on PET packaging for oil-based products. And an adjustment of requirement O37 Amount of packaging: Weight-Utility Ratio (WUR), where adjusted limit values for the packaging type Airless packaging is introduced.

The new version is called 4.2.

On 10 June 2025 Nordic Ecolabelling adopted an adjustment of requirement O33 Plastic packaging: Design for recycling by exempting sealing foil made of plastic from the requirements on separability and materials. And an adjustment of requirement O37 Amount of packaging: Weight-Utility Ratio /WUR), where the packaging type pump bottles is separated into two types with their own limit values: Regular pump bottle and foam pump bottle.

On 24 June 2025 Nordic Ecolabelling adopted an adjustment of requirement O33 Plastic packaging: Desing for recycling by exempting nitril rubber (NBR) in closures for refill deodorants. In requirements O36 Labels and print for all packaging materials: Design for recycling of packaging, the requirement for printing inks to be non-bleeding is removed. Also, the limit values for Airless packaging was changed, due to an error in the values in version 4.2.

The new version is called 4.3.

New criteria

In the next generation of the criteria, the following should be reviewed:

- The possibility for setting a requirement for the maximum allowed content of raw materials based on fossils.
- The possibility for requiring that palm oil/palm kernel oil must be RSPO certified with traceability level Segregated or Identity Preserved, and no longer allowing Mass Balance (or Book and Claim).
- The possibility for setting a requirement for the maximum allowed content of viscose in wet wipes.
- The possibility for setting a requirement for the minimum amount of recycled material in plastic packaging.

Appendix 1 Declaration from the manufacturer of the cosmetic product

To be used in conjunction with an application for a licence for the Nordic Swan Ecolabel of cosmetic products.

This declaration is based on the knowledge we have at the time of the application, based on tests and/or declarations from raw material manufacturers, with reservations for new advances and new knowledge. Should such new knowledge arise, the undersigned is obliged to submit an updated declaration to Nordic Ecolabelling.

Product name:	
Product's function/type (e.g. shampoo, soap, lotion, wet wipes, toothpaste):	
Product group (tick the box):	
Shampoo, conditioner, soap and toothpaste	
Sun protection	
Wet wipes	
Other cosmetics	
Non cosmetics care products	

Ingoing substances and impurities are defined below, unless stated otherwise in the requirements.

- Ingoing substances: All substances in the Nordic Swan Ecolabelled cosmetic product, including additives (e.g. preservatives and stabilisers) in the raw materials. Substances known to be released from ingoing substances (e.g. formaldehyde, arylamine, in situ-generated preservatives) are also regarded as ingoing substances.
- Impurities: Residuals, pollutants, contaminants etc. from production, incl. production of raw materials that remain in the Nordic Swan Ecolabelled cosmetic product in concentrations less than 100 ppm in the rinse-off product and less than 10 ppm in the leave-on product.
- Impurities in the raw materials exceeding concentrations of ≥ 1000 ppm are always regarded as ingoing substances, regardless of the concentration in the Nordic Swan Ecolabelled cosmetic product.

Examples of impurities are residues of the following: residues or reagents incl. residues of monomers, catalysts, by-products, scavengers, and detergents for production equipment and carry-over from other or previous production lines.

Foil that is not removed before use of the product, and that is water soluble is considered as part of the formulation/recipe.

O2: SCCS Opinions	**YES**	**NO**
Is the product a cosmetic product that does *not* comply with SCCS Opinions?		
O4: Palm oil/palm kernel oil	**YES**	**NO**
Does the product contain renewable raw materials from palm oil or palm kernel oil? This includes by-products, residues, and waste fractions from palm oil industries, such as palm fatty acid distillate and palm effluent sludge. **If yes**, is this palm oil/palm kernel oil RSPO certified? What is the tracability level? Tick below and state the certificate/licence number:		
No traceability		
Identity Preserved		
Segregated		
Mass Balance		
O5: Does the product contain substances classified with any of the hazard codes below? *Incl. all classification variants. For example, H350 also covers classification H350i.*	**YES**	**NO**
Carc. 1A or 1B H350		
Carc. 2 H351		
Muta. 1A or 1B H340		
Muta. 2 H341		
Repr. 1A or 1B H360		
Repr 2 H361		
Lact. H362		
Resp. Sens. 1, 1A or 1B H334		
Skin Sens. 1, 1A or 1B H317		
Acute Tox. (oral) 1 or 2 H300		
Acute Chronic 1 H410, M>1		
ED HH 1 EUH380		
ED HH 2 EUH381		

ED ENV 1 EUH430		
ED ENV 2 EUH431		
PBT EUH440		
vPvB EUH441		
PMT EUH450		
vPvM EUH451		
O6-O7: Does the product contain any of the following excluded substances?	**YES**	**NO**
1,4-dioxane (CAS No. 123-91-1) *Applies to ingoing substances and impurities present at ≥ 10 ppm in the cosmetic rinse-off or leave-on product.*		
Alkylphenols (AP) e.g. butylated hydroxy anisole (BHA, CAS No. 25013-16-5), alkylphenol ethoxylates (APEO), and other alkylphenol derivates (APD)		
Bisphenols and bisphenol derivatives with the following EC/List No.: 201-245-8 (BPA), 201-025-1 (BPB), 401-720-1 (4,4'-Isobutylethylidenediphenol), 216-036-7 (BPAF) and its 8 salts (278-305-5; 425-060-9; 443-330-4; 468-740-0; 469-080-6; 479-100-5; 943-265-6; 947-368-7), 201-250-5 (BPS), 201-240-0 (BPC), 204-279-1 (TBMD), 201-618-5 (6,6'-di-tert-butyl-4,4'-butylidenedi-m-cresol), 242-895-2, 248-607-1, 405-520-5 (D8), 217-121-1 (DAB), 227-033-5 (TMBPA), 210-658-2 (BPF), 411-570-9, 277-962-5 (contains BPS, 500-086-4 (contains BPA), 500-263-6 (contains BPA), 500-607-5 (contains BPA), 701-362-9, 904-653-0 (contains BPA), 908-912-9 (contains BPF), 926-571-4 (contains BPA), 931-252-8 (contains BPA), 941-992-3 (contains BPS), 943-503-9 (contains BPA).		
Benzalkonium chloride (CAS No. 63449-41-2)		
Boric acid, borates, and perborates		
Ethylenediamine tetraacetate (EDTA, CAS No. 6381-92-6) and its salts and Diethylenetriamine pentaacetate (DTPA, CAS No. 67-43-6) and its salts		
Halogenated or aromatic solvents		
Microplastics: Synthetic polymer microparticles as defined in the Restriction List (entry 78) of the amended Annex XVII to the REACH Regulation (EC) No 1907/2006 The following "Conditions of restriction" paragraphs apply: 1 (concentration limit in mixtures), 2 (definitions), 3 (particle size limits). The remaining points do not apply, e.g. 4 (Paragraph 1 shall not apply to the placing on the market of:), e.g. 4(a) “synthetic polymer microparticles, as substances on their own or in mixtures, for use at industrial sites”, 5 (derogations), e.g. 5 (b) "synthetic polymer microparticles the physical properties of which are permanently modified during intended end use in such a way that the polymer no longer falls within the scope of this entry". Applies to raw materials, ingoing substances and impurities present at ≥ 0,010% in the cosmetic rinse-off or leave-on product.		
Nanomaterials/-particles, as defined in the cosmetic products regulation ((EC) No 1223/2009): Insoluble or biopersistent and intentionally manufactured materials with one or more external dimensions or an internal structure in the region of 1-100 nm.		
Nitro musks and polycyclic musk compounds		
Organic chlorine compounds, hypochlorous acid and hypochlorite		
Parabens (4-Hydroxibenzoic acid and its salts and esters)		
PBT and vPvB substances in accordance with REACH Annex XIII, including substances under investigation according to the ECHA PBT assessment list https://echa.europa.eu/pbt/-/dislist/details/0b0236e1889ab857		

Per- and polyfluorinated substances (PFAS) PFASs are defined as fluorinated substances containing at least one fully fluorinated methyl or methylene carbon atom (without any H / Cl / Br / I atom attached to it)		
Phthalates (esters of phthalic acid, CAS No. 88-99-3)		
Potential or identified endocrine disruptors, according to any of the following EU member state initiative "Endocrine Disruptor Lists": List I: https://edlists.org/the-ed-lists/list-i-substances-identified-as-endocrine-disruptors-by-the-eu List II: https://edlists.org/the-ed-lists/list-ii-substances-under-eu-investigation-endocrine-disruption List III: https://edlists.org/the-ed-lists/list-iii-substances-identified-as-endocrine-disruptors-by-participating-national-authorities		
Quaternary ammonium compounds, which are not aerobically or anaerobically biodegradable (such as DTDMAC (CAS No. 68783-78-8), DSDMAC (CAS No. 107-64-7), DHTDMAC (CAS No. 61789-80-8) and DADMAC (CAS No. 7398-69-8)).		
Salicylic acid (CAS No. 69-72-7) and its salts (CAS No. 824-35-1 / 18917-89-0 / 59866-70-5 / 54-21-7 / 578-36-9 / 2174-16-5), benzyl salicylate (CAS No. 118-58-1), and ethyl-hexyl salicylate (CAS No. 118-60-5)		
Siloxanes, that are cyclic		
Siloxanes, that are linear		
Silver, colloidal silver and nanosilver		
Substances on the REACH Candidate list of SVHC https://www.echa.europa.eu/candidate-list-table		
Titanium dioxide (TiO2, CAS No. 13463-67-7)		
If yes, does the product contain titanium dioxide powder that is *not* added in a closed system, in a suspension or by means of a method that promotes a “low dust” working environment, e.g. using protective equipment which heavily reduces the dust or completely removes the dust from the raw materials (e.g. exhaust ventilation, personal protective equipment and clear safety instructions)?		
Triclosan (CAS No. 3380-34-5)		
O8: Surfactants	**YES**	**NO**
Does the product contain surfactants? Surfactants are defined as any organic substance, which has surface-active properties, and which consists of one or more hydrophilic and one or more hydrophobic groups of such a nature and size that it is capable of reducing the surface tension of water. Substances on the DID-list with number 2001-23xx are considered surfactants and substances with number 2401-26xx are not considered surfactants.		
Is the product a toothpaste that contains sodium lauryl sulphate (SLS)?		
O9-011: Fragrances	**YES**	**NO**
Does the product contain fragrances that are *not* added in line with the IFRA guidelines?		
Is the product intended for babies/children and contain fragrances?		
Does the product contain fragrances that are H317/H334 classified or fragrance allergens listed in Annex III of the Cosmetics Regulation?		
Does the product contain the fragrance allergens oak moss extract (Evernia prunastri, CAS No. 90028-68-5) or tree moss extract (Evernia furfuracea, CAS 90028-67-4)?		
O12: Organic colorants	**YES**	**NO**
Does the product contain organic colourants? **If yes**, state log Kow/BCF or E-number:		

Does the product contain Carbon Black?		
O13: Preservatives	**YES**	**NO**
Does the product contain preservatives? **If yes**, state log KowW/BCF:		
Does the product contain preservatives that are not readily aerobic biodegradable?		
O14: UV filters	**YES**	**NO**
Does the product contain UV filters? **If yes**, state log KoW/BCF or lowest available NOEC/EC/LC50: **If yes**, are the UV filters added to protect the product?		
O15: Does the product contain synthetic polymers with one or more residual monomers of the following properties > 100 ppm: *Incl. all classification variants. For example, H350 also covers classification H350i.*	**YES**	**NO**
Carc. 1A or 1B H350		
Carc. 2 H351		
Muta. 1A or 1B H340		
Muta. 2 H341		
Repr. 1A or 1B H360		
Repr 2 H361		
Lact. H362		
Resp. Sens. 1, 1A or 1B H334		
Skin Sens. 1, 1A or 1B H317		
STOT SE 1 or 2 H370-H373		
Acute Tox. (oral) 1 or 2 H300, H301		
Acute Tox. (dermal) 1 or 2 or 3 H310, H311		
Acute Tox. (inhalation) 1 or 2 H330, H331		
ED HH 1 or 2 EUH 380, EUH 381		

O16: Aluminium	**YES**	**NO**
Does the product contain aluminium? **If yes**, state the amount of aluminium corresponding to elemental %Al:		
O17: Environmentally hazardous substances	**YES**	**NO**
Does the product contain substances classified H410, H411 or H412?		
O21-O22: Oral products	**YES**	**NO**
Is the product a lip product, toothpaste, oral hygiene product or nipple cream? **If yes**, state the E-number of colorants and preservatives: **If yes**, state the FL-number of flavourings: FL-numbers are available at the European Commission's Food flavourings database https://ec.europa.eu/food/food-feed-portal/screen/food-flavourings/search and Annex I of Regulation (EC) No 1334/2008		
Is the product a lip product with mineral oil saturated hydrocarbons (MOSH) or mineral oil aromatic hydrocarbons (MOAH) that does not comply with the recommendations by Cosmetic Europe for mineral oils? https://cosmeticseurope.eu/download/N08vNnB0TUhMbWpwQmlqVk9UZzdwZz09		
Is the product a toothpaste or mouthwash? **If yes**, state the content of fluoride:		
Is the product a mouthwash that contains more than 0,1% water-soluble zinc salts?		
O23-O24: Decorative cosmetics and hair dyes	**YES**	**NO**
Is the product a decorative cosmetic or hair dye that contains more than the following amounts of heavy metals? - Arsenic, antimony, cadmium, cobalt, lead, mercury: 1 ppm - Chromium, nickel: 10 ppm		
Is the product a hair dye that contains lawsone (CAS No. 83-72-7), hydroxypropyl p-phenylenediamine or its dihydrochloride salt (CAS No. 928659-47-5 and CAS No. 73793-79-0) or hair dyes judged to be sensitising and/or allergenic by the SCCS (even if they do not meet the classification of H317 and/or H334)?		
O29-O31: Animal care products and lubricants	**YES**	**NO**
Is the product an animal care product, sex lubricant, or medical lubricant that contains fragrance or colorants?		
Is the product an animal care product or sex lubricant that is classified H400, H411, H412 or H413?		
Is the product a sex lubricant or medical lubricant, which is covered by the Medical Devises Regulation ((EU) 2017/745)?		
Is the product an animal care product, sex lubricant, or medical lubricant that does *not* comply with the following parts of the EU regulation on cosmetic products: - Article 3 Safety (only applies to sex lubricants) - Article 8 Good manufacturing practise (only applies to sex lubricants) - Article 10 Safety assessment (only applies to sex lubricants) - Article 14 Restrictions for substances listed in the Annexes - Article 15 Substances classified as CMR substances - Article 19 Labelling - Article 20 Product claims		

O32: Packaging and materials	**YES**	**NO**
Is the product a liquid product in miniature packaging (< 100 ml) and being sold to the HoReCa sector (hotels, restaurants, and catering)?		
Does the packaging contain metal seals or other metal parts?		
O33: Plastic packaging: Design for recycling	**YES**	**NO**
If the closure contains a membrane of silicone: Is the bottle a squeezable upside down bottle? Is the density of the silicone membrane compatible with recycling of the closure (< 0.95 g/cm^3 for PET and > 1.0 g/cm^3 for PE and PP)?		
If the closure contains a membrane of nitril rubber (NBR): Is the product a refill deodorant, or similar liquid product that is refilled from the bottom? Is the density of the NBR membrane compatible with recycling of the closure (< 0.95 g/cm^3 for PET and > 1.0 g/cm^3 for PE and PP)?		
Is the packaging Opaque PET? If yes, is the product a oil-based product containing unsaturated and/or polyunsaturated fatty acids?		
O36: **Labels** and direct print **for all packaging material**s	**Yes**	**NO**
For packaging other than tubes, flexible plastic pouches, paper-based packaging or aluminium containers: Is direct print on the packaging only used for date codes, batch codes and UFI?		
Are labels printed internal at the production site, or by an external printing company (other than the label supplier)? If yes, is the printing ink used for plastic packaging non-bleeding and compliant wih EuPIA exclusion policy?		

If the answer to any of the above questions is yes, state the CAS No. (where possible), chemical name and level (in ppm, % by weight or mg/kg). Also, state whether the substance is contained in the form of an impurity or an ingoing substance.

In the event of any change to the composition of the product, a new declaration of fulfilment of the requirements is to be submitted to Nordic Ecolabelling.

Place and date	**Company name/**
Responsible person	**Signature of responsible person**
Telephone	**Email**

Appendix 2 Declaration from the manufacturer/supplier of the raw material

To be used in conjunction with an application for a licence for the Nordic Swan Ecolabel of cosmetic products.

This declaration is based on the knowledge we have at the time of the application, based on tests and/or declarations from raw material manufacturers, with reservations for new advances and new knowledge. Please inform Nordic Ecolabelling if new knowledge arises and submit an updated declaration.

For suppliers: If you do not have knowledge about the complete composition of the raw material/ingredient, you are obliged to obtain this information from the manufacturer.

Manufacturer/Supplier
Trade name of the raw material

Ingoing substances and impurities are defined below, unless stated otherwise in the requirements.

- Ingoing substances: All substances in the Nordic Swan Ecolabelled cosmetic product, including additives (e.g. preservatives and stabilisers) in the raw materials. Substances known to be released from ingoing substances (e.g. formaldehyde, arylamine, in situ-generated preservatives) are also regarded as ingoing substances.
- Impurities: Residuals, pollutants, contaminants etc. from production, incl. production of raw materials that remain in the Nordic Swan Ecolabelled cosmetic product in concentrations less than 100 ppm in the rinse-off product and less than 10 ppm in the leave-on product.
- Impurities in the raw materials exceeding concentrations of ≥ 1000 ppm are always regarded as ingoing substances, regardless of the concentration in the Nordic Swan Ecolabelled cosmetic product.

Examples of impurities are residues of the following: residues or reagents incl. residues of monomers, catalysts, by-products, scavengers, and detergents for production equipment and carry-over from other or previous production lines.

Foil that is not removed before use of the product, and that is water soluble is considered as part of the formulation/recipe.

Note that if the raw material contains impurities listed in this appendix, write the amount at the end of the appendix. The manufacturer of the Nordic Swan Ecolabelled product is responsible for calculating compliance with the requirements of the criteria.

Raw material/ ingredient(s)	Chemical name	INCI name	CAS no.	Amount in weight-%	Function of the raw material/ ingredient	Suggested DID-no.

Please note that:

- *the definition of a surfactant: Any organic substance, which has surface-active properties, and which consists of one or more hydrophilic and one or more hydrophobic groups of such a nature and size that it is capable of reducing the surface tension of water.*
- *the DID-list is available from the Nordic Ecolabelling web pages*
- *the information in this declaration is internally shared with certification personnel in Nordic Ecolabelling to be used in evaluation of applications of chemical technical products.*

O4: Palm oil/palm kernel oil	**YES**	**NO**
Does the raw material contain palm oil or palm kernel oil? This includes by-products, residues, and waste fractions from palm oil industries, such as palm fatty acid distillate and palm effluent sludge. **If yes**, is this palm oil/palm kernel oil RSPO certified? What is the tracability level? Tick below and state the certificate/licence number:		
No traceability		
Identity Preserved		
Segregated		
Mass Balance		
O5: Does the product contain substances classified with any of the hazard codes below? *Incl. all classification variants. For example, H350 also covers classification H350i.*	**YES**	**NO**
Carc. 1A or 1B H350		
Carc. 2 H351		
Muta. 1A or 1B H340		
Muta. 2 H341		
Repr. 1A or 1B H360		

Repr 2 H361		
Lact. H362		
Resp. Sens. 1, 1A or 1B H334		
Skin Sens. 1, 1A or 1B H317		
Acute Tox. (oral)1 or 2 H300		
Acute Chronic 1 H410, M>1		
ED HH 1 EUH380		
ED HH 2 EUH381		
ED ENV 1 EUH430		
ED ENV 2 EUH431		
PBT EUH440		
vPvB EUH441		
PMT EUH450		
vPvM EUH5510,		
O6-07: Does the raw material contain any of the following excluded substances?	**YES**	**NO**
1,4-dioxane (CAS No. 123-91-1)		
Alkylphenols (AP) (e.g. butylated hydroxy anisole (BHA, CAS No. 25013-16-5), alkylphenol ethoxylates (APEO), and other alkylphenol derivates (APD)		
Bisphenols and bisphenol derivatives with the following EC/List No.: 201-245-8 (BPA), 201-025-1 (BPB), 401-720-1 (4,4'-Isobutylethylidenediphenol), 216-036-7 (BPAF) and its 8 salts (278-305-5; 425-060-9; 443-330-4; 468-740-0; 469-080-6; 479-100-5; 943-265-6; 947-368-7), 201-250-5 (BPS), 201-240-0 (BPC), 204-279-1 (TBMD), 201-618-5 (6,6'-di-tert-butyl-4,4'-butylidenedi-m-cresol), 242-895-2, 248-607-1, 405-520-5 (D8), 217-121-1 (DAB), 227-033-5 (TMBPA), 210-658-2 (BPF), 411-570-9, 277-962-5 (contains BPS, 500-086-4 (contains BPA), 500-263-6 (contains BPA), 500-607-5 (contains BPA), 701-362-9, 904-653-0 (contains BPA), 908-912-9 (contains BPF), 926-571-4 (contains BPA), 931-252-8 (contains BPA), 941-992-3 (contains BPS), 943-503-9 (contains BPA).		
Benzalkonium chloride (CAS No. 63449-41-2)		
Boric acid, borates, and perborates		
Ethylenediamine tetraacetate (EDTA, CAS No. 6381-92-6) and its salts and Diethylenetriamine pentaacetate (DTPA, CAS No. 67-43-6) and its salts		
Halogenated or aromatic solvents		
Microplastics: Synthetic polymer microparticles as defined in the Restriction List (entry 78) of the amended Annex XVII to the REACH Regulation (EC) No 1907/2006. The following "Conditions of restriction" paragraphs apply: 1 (concentration limit in mixtures), 2 (definitions), 3 (particle size limits). The remaining points do not apply, e.g. 4 (Paragraph 1 shall not apply to the placing on		

the market of:), e.g. 4(a) “synthetic polymer microparticles, as substances on their own or in mixtures, for use at industrial sites”, 5 (derogations), e.g. 5 (b) "synthetic polymer microparticles the physical properties of which are permanently modified during intended end use in such a way that the polymer no longer falls within the scope of this entry"		
Nanomaterials/-particles, as defined in the cosmetic products regulation ((EC) No 1223/2009): Insoluble or biopersistent and intentionally manufactured materials with one or more external dimensions or an internal structure in the region of 1-100 nm.		
Nitro musks and polycyclic musk compounds		
Organic chlorine compounds, hypochlorous acid and hypochlorite		
Parabens (4-Hydroxibenzoic acid and its salts and esters)		
PBT and vPvB substances in accordance with REACH Annex XIII, including substances under investigation according to the ECHA PBT assessment list https://echa.europa.eu/pbt/-/dislist/details/0b0236e1889ab857		
Per- and polyfluorinated substances (PFAS) PFASs are defined as fluorinated substances containing at least one fully fluorinated methyl or methylene carbon atom (without any H / Cl / Br / I atom attached to it)		
Phthalates (esters of phthalic acid, CAS No. 88-99-3)		
Potential or identified endocrine disruptors, according to any of the following EU member state initiative "Endocrine Disruptor Lists": List I: https://edlists.org/the-ed-lists/list-i-substances-identified-as-endocrine-disruptors-by-the-eu List II: https://edlists.org/the-ed-lists/list-ii-substances-under-eu-investigation-endocrine-disruption List III: https://edlists.org/the-ed-lists/list-iii-substances-identified-as-endocrine-disruptors-by-participating-national-authorities		
Quaternary ammonium compounds, which are not aerobically or anaerobically biodegradable** (such as DTDMAC (CAS No. 68783-78-8), DSDMAC (CAS No. 107-64-7), DHTDMAC (CAS No. 61789-80-8) and DADMAC (CAS No. 7398-69-8)).		
Salicylic acid (CAS No. 69-72-7) and its salts (CAS No. 824-35-1 / 18917-89-0 / 59866-70-5 / 54-21-7 / 578-36-9 / 2174-16-5), benzyl salicylate (CAS No. 118-58-1), and ethyl-hexyl salicylate (CAS No. 118-60-5)		
Siloxanes, that are cyclic		
Siloxanes, that are linear		
Silver, colloidal silver and nanosilver		
Substances on the REACH Candidate list of SVHC https://www.echa.europa.eu/candidate-list-table		
Titanium dioxide (TiO2, CAS No. 13463-67-7)		
Triclosan (CAS No. 3380-34-5)		
O8: Surfactants	**YES**	**NO**
Does the raw material contain surfactants? Surfactants are defined as any organic substance, which has surface-active properties, and which consists of one or more hydrophilic and one or more hydrophobic groups of such a nature and size that it is capable of reducing the surface tension of water. Substances on the DID-list with number 2001-23xx are considered surfactants and substances with number 2401-26xx are not considered surfactants.		
Does the raw material contain sodium lauryl sulphate (SLS)?		

O9-011: Fragrances	**YES**	**NO**
Does the raw material contain fragrance? **If yes**, answer the next three questions below.		
Does the raw material contain fragrances that are *not* added in line with the IFRA guidelines?		
Does the raw material contain fragrances that are H317/H334 classified or fragrance allergens listed in Annex III of the Cosmetics Regulation?		
Does the raw material contain the fragrance allergens oak moss extract (Evernia prunastri, CAS No. 90028-68-5) or tree moss extract (Evernia furfuracea, CAS 90028-67-4)?		
O12: Organic colorants	**YES**	**NO**
Does the raw material contain organic colourant? **If yes**, state log KoW/BCF or E-number:		
Does the raw material contain Carbon Black?		
O13: Preservatives	**YES**	**NO**
Does the raw material contain preservatives? **If yes**, state log KoW/BCF:		
Does the raw material contain preservatives that are *not* readily aerobic biodegradable?		
O14: UV filters	**YES**	**NO**
Does the raw material contain UV filters? **If yes**, state log KoW/BCF or lowest available NOEC/EC/LC50:		
O15: Does the raw material contain synthetic polymers with one or more residual monomers of the following properties > 100 ppm: *Incl. all classification variants. For example, H350 also covers classification H350i*	**YES**	**NO**
Carc. 1A or 1B H350		
Carc. 2 H351		
Muta. 1A or 1B H340		
Muta. 2 H341		
Repr. 1A or 1B H360		
Repr 2 H361		
Lact. H362		
Resp. Sens. 1, 1A or 1B H334		
Skin Sens. 1, 1A or 1B H317		

STOT SE 1 or 2 H370-H373		
Acute Tox. (oral) 1 or 2 H300, H301		
Acute Tox. (dermal) 1 or 2 or 3 H310, H311		
Acute Tox. (inhalation) 1 or 2 H330, H331		
ED HH 1 or 2 EUH 380, EUH 381		
O16: Aluminium	**YES**	**NO**
Does the raw material contain aluminium? **If yes**, state the amount of aluminium corresponding to elemental %Al:		
O17: Environmentally hazardous substances	**YES**	**NO**
Does the raw material contain substances classified H410, H411 or H412? **If yes**, state the amount (% by weight) per classification:		
O21-O22: Oral products	**YES**	**NO**
Does the raw material contain colourants, preservatives or flavourings? **If yes**, state the E-number of colorants and preservatives: **If yes**, state the FL-number of flavourings:		
Does the raw material contain mineral oil saturated hydrocarbons (MOSH) or mineral oil aromatic hydrocarbons (MOAH)?		
Does the raw material contain fluoride? **If yes**, state the content:		
Does the raw material contain water-soluble zinc salts? **If yes**, state the content:		
O23-O24: Decorative cosmetics and hair dyes	**YES**	**NO**
Is the raw material a colourant for decorative cosmetics or hair dye? **If yes**, answer the next three questions below.		
Does the colourant contain heavy metals? **If yes**, state type and content:		

Does the colourant contain Bismuth Oxychloride (CAS No. 7787-59-9)?		
Does the colourant contain lawsone (CAS No. 83-72-7), hydroxypropyl p-phenylenediamine or its dihydrochloride salt (CAS No. 928659-47-5 and CAS No. 73793-79-0) or hair dyes judged to be sensitising and/or allergenic by the SCCS (even if they do not meet the classification of H317 and/or H334)?		

If the answer to any of the above questions is yes, state the CAS No. (where possible), chemical name and level (in ppm, % by weight or mg/kg). Also, state whether the substance is contained in the form of an impurity or an ingoing substance.

In the event of any change to the composition of the product, a new declaration of fulfilment of the requirements is to be submitted to Nordic Ecolabelling.

Place and date	**Company name**
Responsible person	**Signature of responsible person**
Telephone	**Email**

Appendix 3 Declaration on sensitising substances in the process water for wet wipe carrier material

To be used in conjunction with an application for a licence for the Nordic Swan Ecolabel of cosmetic products.

This declaration is based on the knowledge we have at the time of the application, based on tests and/or declarations from raw material manufacturers, with reservations for new advances and new knowledge. Please inform Nordic Ecolabelling if new knowledge arises and submit an updated declaration.

Manufacturer/supplier
Wet wipe material (tradename and composition)

O26: Process water	**YES**	**NO**
Are sensitising substances with H317 and/or H334 used in the process water of the wet wipe material?		
If yes, does the concentration in the carrying material/wipe exceed 0.10 ppm per sensitising substance? Enclose an analysis report.		

In the event of any change to the composition of the product, a new declaration of fulfilment of the requirements is to be submitted to Nordic Ecolabelling.

Place and date	**Company name**
Responsible person	**Signature of responsible person**
Telephone	**Email**

Appendix 4 Declaration from the manufacturer/supplier of the primary packaging component

To be used in conjunction with an application for a licence for the Nordic Swan Ecolabel of cosmetic products.

This declaration is based on the knowledge we have at the time of the application, based on tests and/or declarations from raw material manufacturers, with reservations for new advances and new knowledge. Please inform Nordic Ecolabelling if new knowledge arises and submit an updated declaration. Please note that small amounts of impurities when using recycled materials are possible and do not affect fulfilment of the requirements.

Recycled material is defined in accordance with ISO 14021 in the following two categories:

- Material in the pre-consumer phase. Material that has been taken from the waste flow during the manufacturing process. The exception is the re-use of material that is generated in a process, e.g. waste that can be recycled within the same process that generated it.
- Material in the post-consumer phase. Material generated by households or by trade, industry, or institutional facilities in their role as end-users of a product that can no longer be used for its intended purpose. This includes the return of materials from the distribution chain.

Manufacturer/supplier
Packaging name and/or item number (write all the names/numbers this declaration covers)
Component of the packaging (container, closure, label)
Component weight
Packaging material (type of plastic, cardboard etc.). List all materials included in the packaging component and the percentage of each material.

O32: Aluminium packaging	**YES**	**NO**
Is the packaging made from aluminium that has parts or layers of other types metals?		
Is the packaging made from aluminium alloys?		
Does the aluminium packaging contain ≥ 60% recycled material*? * *Please see definition above.*		
O32: Metal other than aluminium	**YES**	**NO**
Does the packaging contain metal (other than aluminium)?		
O32: Glass packaging	**YES**	**NO**
Does the glass contain ≥ 50% recycled material*? * *Please see definition above.*		
O33: Plastic packaging	**YES**	**NO**
Separability: Does the packaging have a threadneck?		
Is the component made from > 99% polyethylene (PE), > 95% polypropylene (PP) or > 98% polyethylene terephthalate? Is the remaining material biodegradable or of a different material than PE or PP? For PE and PP: Please state the density of the plastic:		
Does the component contain metal parts? **If yes,** is the metal part found in a pump, a trigger spray or as a metal ball in propellant bottles?		
If made of PET: Is the component transparent or coloured transparent?		
Has carbon black been added to the component?		
Are any barriers used in the component? **If yes**, please state barrier type and percentage (weight %):		
For closures: Does the component contain a membrane of nitril rubber (NBR)? **If yes:** What is the density of the nitril rubber (NBR) membrane?		
For closures: Does the component contain a membrane of silicone? **If yes:** What is the density of the silicone membrane? Does the silicone contain less than 1000 ppm of D4, D5 and D6?		
Is the component treated with PFAS* (on the inside or outside)? * *PFASs are defined as fluorinated substances containing at least one fully fluorinated methyl or methylene carbon atom (without any H / Cl / Br / I atom attached to it)*		
Is the packaging a tube? **If yes**, is the printing ink compliant wih EuPIA exclusion policy*? *https://www.eupia.org/wp-content/uploads/2024/03/20240313-EuPIA_Exclusion_Policy_for_Printing_Inks_and_Related_Products_-March-2024_6th-Edition-v1-1.pdf		

O34: Paper-based packaging	YES	NO
Does the packaging contain recycled material*? ** See definition above.*		
With reference to the percentage PCR in the wood raw material above: Is the remaining proportion of wood raw material covered by the FSC/PEFC control schemes (FSC controlled wood/PEFC controlled sources)? **If yes**, please state the percentage:		
Is the packaging a cardboard packaging?		
Is the packaging a corrugated board packaging?		
Is the packaging laminated with any barrier material? **If yes**, please state the barrier material type: Is the laminate on one side only?		
Does the packaging contain PVC (polyvinyl chloride) or other types of halogenated plastics?		
Is the packaging material solid coloured in other colours than white?		
O36: Labels and direct print	**YES**	**NO**
Is the label made of plastic? **If yes**, please specify the label material(s) and its density in g/cm^3: If the label is made of PET, which type of PET is it made of?		
Is the label made of paper? **If yes**, is the glue water soluble?		
Is the printing ink used compliant with EuPIA's exclusion policy*? ** https://www.eupia.org/wp-content/uploads/2024/03/20240313-EuPIA_Exclusion_Policy_for_Printing_Inks_and_Related_Products_-March-2024_6th-Edition-v1-1.pdf*		

In the event of any change to the composition of the product, a new declaration of fulfilment of the requirements is to be submitted to Nordic Ecolabelling.

Place and date	**Company name/**
Responsible person	**Signature of responsible person**
Telephone	**Email**

Appendix 5 Declaration from the manufacturer of the primary packaging component – cardboard packaging for liquid products

To be used in conjunction with an application for a licence for the Nordic Swan Ecolabel of cosmetic products.

This declaration is based on the knowledge we have at the time of the application, based on tests and/or declarations from raw material manufacturers, with reservations for new advances and new knowledge. Please inform Nordic Ecolabelling if new knowledge arises and submit an updated declaration. Please note that small amounts of impurities when using recycled materials are possible and do not affect fulfilment of the requirements.

Please note that small amounts of impurities when using recycled materials are possible and do not affect fulfilment of the requirements.

Packaging manufacturer	**Trademark/trade name of the primary packaging:**

Sustainable material and design for recycling (requirement O35)

How should the packaging component be recycled? (E.g. as carboard or plastic packaging) (O18)

Constituent materials

Please fill in all fields in the table below. Materials such as paper/paperboard, coating materials, and closure materials must be listed. Additives or chemicals such as printing inks or chemicals within the pulp/paper does not need to be listed.

Material	Function	Weight of the material [g]	% by weight of the material as a ratio of the total weight of the packaging	Is the material bio-based*? State Yes/No	Is the material post- consumer/commercial recycled**? State Yes/No
Total			**100 %**		

Overview of materials, suppliers and weights

** Bio-based means that the material consists of biomass that may have undergone physical, chemical or biological treatment(s). Biomass has a biological origin but excludes material that is found embedded in geological and/or fossil formations. Examples of biomass are: (all or parts of) plants, trees, algae, marine organisms, microorganisms, animals, etc.*

*** Post-consumer/commercial recycled material is defined in the requirement according to ISO 14021:2016:*

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

Pulp/paper

Ratio of bio-based material/recycled material in the packaging: _____

State the percentage by weight of the pulp/paper that originates from forestry certified under the FSC or PEFC schemes: _____

State the percentage (by weight) of the pulp/paper that is post- consumer/commercial recycled**: _____

	YES	NO
With reference to the percentages above. Is the remaining proportion of wood raw material covered by the FSC/PEFC control schemes (FSC controlled wood/PEFC controlled sources)?		
Bio-based plastic	**YES**	**NO**
Has palm oil been used as a raw material, other than as secondary raw material***?		
Has soy been used as a raw material, other than as secondary raw material***?		
Has sugar cane been used as a raw material, other than as a secondary raw material***?		
*** *Secondary raw materials are defined here as residual products from other production processes, such as waste products from the food industry, by-products such as straw from grain production, by-products from maize and dried palm leaves. Palm fatty acid distillate (PFAD) from palm oil is not counted as a residual/waste product*		
Materials excluded from use	**YES**	**NO**
Does the packaging contain PVC or other types of halogenated plastics?		
Does the packaging contain aluminium or other metals?		
Printin	**YES**	**NO**
Is all print done as direct printing on the packaging?		
If yes, are all inks that are used water-based?		

In the event of any change to the composition of the product, a new declaration of fulfilment of the requirements is to be submitted to Nordic Ecolabelling.

Place and date	**Company name/stamp**
Responsible person	**Signature of responsible person**
Telephone	**E-mail**

Appendix 6 Packaging calculations

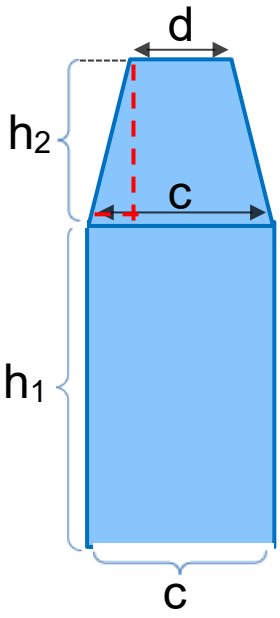
1. Calculation of coverage of label on PET packaging

Below follows a description of how the calculation of coverage of labels on PET containers should be carried out. The calculations can be done in Nordic Ecolabelling's calculation sheet for packaging.

Calculation for a non-cylindrical bottle:

The calculation of the percentage shall be based on the two-dimensional profile of the container i.e., the area of the top and bottom of the packaging and the sides of a box/container/bottle/can shall not be included in the calculation. If the label on the front of pack and back of the packaging are of different size, the maximum percentage shall be fulfilled for each side separately.

The illustration below shows an example of the measurements involved in the calculation of the total area of a non-cylindrical container:



The following formulas can be used to calculate the area:

$$Area\ A_1 = c \cdot h_1$$

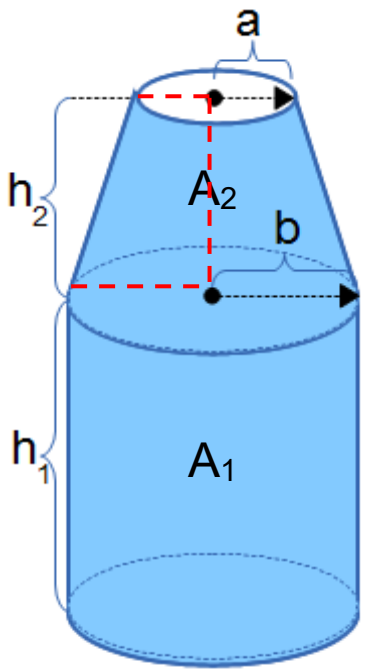
$$Area\ A_2 = \frac{h_2 \cdot (c + d)}{2}$$

$$Total\ area\ A = A_1 + A_2$$

Calculation for a cylindrical bottle:

For a cylindrical container, the calculation shall be based on the three-dimensional profile excluding the bottom and top of the container.

The illustration below shows the measurements involved in the calculation of the total area of a cylindrical container:



The following formulas can be used to calculate the area:

$$Area\ A_1 = 2 \cdot \pi \cdot b \cdot h_1$$

$$Area\ A_2 = \pi \cdot (b + a) \cdot \sqrt{h_2^2 + (b - a)^2}$$

$$Total\ area\ A = A_1 + A_2$$

2. Amount of packaging

The amount of packaging compares the amount of packaging material with the content using the following formula:

$$\frac{\sum(mf_i \cdot W_{material\_i})}{t} \leq a \cdot Vol_{product} + b$$

mf_i = Material factor for type of material divided into the following three materials:

$mf_{paper/cardboard}$ = 0.4

$mf_{plastic}$ = 1.0

$mf_{plastic\ laminate}$ = 1.0

$mf_{aluminium}$ = 2.1

mf_{glass} = 0.6

$W_{material\ i}$ = Weight of the packaging component (including label + information sheet) in grams

t = Reuse factor (t=1 for packaging which is not reused for the same purpose, t > 1 if the product is sold with a refill or for the purpose of multiple refills, e.g. t = 5 if the amount of refills is 4.)

$Vol_{product}$ = Volume of the product in ml

a and b are constants that vary for different packaging types:

Packaging type	a	b
Regular pPump bottle	0.05	28
Foam pump bottle	0.035	52
Airless packaging	0.36	19
Tube	0.1	7.5
Bottle	0.065	15
Jar	0.08	35
Stick + roll on	0.5	9
Wet wipes*	0.098	8
Propellant bottles	0.4	10
Solid soaps, shampoo etc.	0.025	0.4
Diverse	0.013	15

** Wet wipes use the same equation as above, but volume of the product is replaced by the number of wet wipes in the packaging.*

Below follows examples of packaging within a few categories. If you are unsure of in which category your packaging fits into, please ask your contact at Nordic Ecolabelling.

- Regular pump bottle includes bottles with regular pumps and trigger sprays.
- Foam pump bottle includes bottles with foam pumps.
- Airless includes all packaging designed to completely empty the packaging of product.
- Bottle includes all regular bottles with a flip cap, squeeze bottles, etc., without a pump
- Jars includes jars with a screw-on top
- Stick + roll-on includes all sticks, e.g. lip balm, sun sticks, and all roll-on, e.g. deodorant
- Propellant bottles includes bottles, usually in aluminium, with a propellant gas
- Solid soaps, shampoo etc. includes all solid products.
- Diverse is for packaging not mentioned above, it could e.g. a be bottle with pipette, pouches, bag-in-a-box.

<u>Example calculation</u>

Example calculation for a 200 ml product with a pump that is not sold with a refill (plastic packaging including pump weighs 37 g in total):

$$\frac{\sum(mf_i \cdot W_{material\_i})}{t} \leq a \cdot Vol_{product} + b$$

$$\frac{\sum(mf_i \cdot W_{material\_i})}{t} \leq 0.05 \cdot Vol_{product} + 28$$

$$\frac{\sum(1.0 \cdot 37g)}{1} \leq 0.05 \cdot 200 + 28$$

$$\frac{37g}{1} \leq 10 + 28$$

$$37 \leq 38 \Rightarrow OK$$

3. Emptying level

The amount of product remaining in the packaging (R), which must be less than 10% is calculated using the following formula:

$$R = \frac{(m_2 - m_3)}{m_1 - m_3} \cdot 100\%$$

where:

m_1= mass of primary packaging and product (g)

m_2= mass of primary packaging and remainder of product in normal conditions (g)

m_3= mass of empty and clean primary packaging (g)

Normal conditions of use are defined as:

- Pump bottle: Repeatedly press the mouth of the pump. If nothing has come out of the packaging after 5 presses in a row, the packaging is considered to be empty. The mouth of the pump may not be taken apart and water must not be introduced in the packaging.
- Vials/flasks: The vial is turned upside down, with the cap in the downward position and is pressed as it would usually be pressed when using the product. When the trickle is not continuous, the bottle is left in the same position for a maximum of 24 hours. The bottle can also be hit on the table which corresponds to normal consumer behaviour. Neither the cap is dismantled, nor water is introduced inside the packaging.

The packaging is approved if an average of 3 tests come in below the limit. The same test can be used for products that are similar but have different perfumes or colours. The products must be the same viscosity.

Appendix 7 Analysis laboratory and test methods

1. Requirements for analysis laboratory
The analysis laboratory shall fulfil the general requirements of standard EN ISO/IEC 17025 or have official GLP status.

2. Approved test methods
International test methods (OECD Guidelines for Testing of Chemicals, ISBN 92-64-1222144) or equivalent methods must be used for documentation. If equivalent methods are used, these must be assessed by an independent body and approved by Nordic Ecolabelling to ensure that the results are equivalent. The relevant test methods are stated in the below sections. Calculations from data models (such as BIOWIN) are accepted, if they are assessed by an independent body, but if the results of the model calculations are close to the threshold values or if Nordic Ecolabelling has contradictory data, more certain information may be required.

3. Aquatic toxicity
For acute aquatic toxicity, test methods no. 201, 202, 203*, and 212* in the OECD Guideline are used. For chronic aquatic toxicity test methods no. 210*, 211, 215*and 229* in the OECD Guideline are used. OECD 201 can be used as chronic test if chronic endpoints are chosen.

** The Commission prohibited animal testing of ingredients for cosmetic products from March 2009 onwards. To determine aquatic toxicity, however, the prohibition only concerns testing with fish (does not include invertebrates). As such, OECD test guideline no. 203 (acute toxicity – fish), 210, 215 and 229 (chronic toxicity – fish) cannot be used to document acute/chronic toxicity in the future. The results of acute/chronic toxicity testing using fish produced before March 2009 may still be used, however.*

4. Bioaccumulation
Unless otherwise proven, a substance is considered bioaccumulating if tested for bioaccumulation on fish according to method OECD 305 A-E* or OECD 321 and its bioconcentration factor (BCF) is >500. If no BCF value has been determined, a substance is considered bioaccumulating if its logKow value ≥ 4.0 according to method 107, 117 or 123 in the OECD Guidelines for the Testing of Chemicals or equivalent method. If the maximum measured BCF ≤ 500, the substance is not considered bioaccumulating even if logKow ≥ 4.0.

OECD test method 107 cannot be applied to surfactants which have both fat and water-soluble properties. Based on what is known today, for such substances it must be demonstrated with a high degree of certainty that they and their degradation products do not pose any risk to aquatic organisms over a longer time perspective.

** The Commission prohibited animal testing of ingredients for cosmetic products from March 2009 onwards. As such, OECD test guideline no. 305 (bioconcentration factors), cannot be used to document bioaccumulation in the future. Results produced before March 2009 may still be used, howeve*r.

5. Aerobic biodegradability
For aerobic biodegradability test method no. 301 (A to F), 306 or 310 in the OECD Guidelines are used.

6. Potential aerobic biodegradability
For potential (inherently) biodegradability test method no. 302 (A to C) in the OECD Guidelines are used.

7**. Anaerobic biodegradability**
For anaerobic degradability test method no. 311 in the OECD Guidelines, ISO 11734, or ECOTOC no. 28 (June 1988) are used.

Substances that are not surfactants and which are not included in the DID-list or for which data is missing on DID-list list may be exempt from the requirements on anaerobic degradability if they fulfil all the following requirements:

- Not toxic to aquatic organisms (NOEC/ECx > 0.1 mg/l or E/LC50 > 10 mg/l)
- Readily aerobically biodegradable
- Have low adsorption (A < 25%) or high desorption (D > 25%) or are not bioaccumulating

Testing for adsorption/desorption can be carried out under OECD guidelines 106 or under ISO CD 18749" Water quality - Adsorption of substances on activated sludge - Batch test using specific analytical methods".

8. DID-list
The DID-list, Detergent Ingredient Database has been developed to facilitate the ecolabel application process and is a tool to rank chemicals and thus make it easier for licence holders and producers to choose less environmentally harmful chemicals in their products. The list contains information on toxicity and degradability of several substances that are used in chemical products.

The substances on the DID-list cannot be seen as an overview of substances that are contained in ecolabelled products, and the DID-list cannot be used to document the toxicity of the individual substances in connection with the classification rules. Here, information from safety data sheets, literature or the raw materials producer must be used.

The DID-list can be obtained from the ecolabelling organisation or the website of the respective country. If a substance is not included on the DID-list, or biodegradability data is missing, the methods described in part B of the DID-list must be used. For these criteria, the DID-list dated 2023 or later versions apply.

Appendix 8 Requirements for cellulose-based pulp/fluff pulp in wet wipe carrier material

<u>Cellulose-based pulp/fluff pulp</u> (≧ 1.0 weight-%)

The manufacturer of wipe carrier material shall provide information regarding the pulp: state the name and type of the pulp/fluff pulp - manufacturer, trade name, production site, type of pulp (such as ECF, TCF, CTMP etc., market pulp or not).

The following requirements must be met:

- Only virgin fibres shall be used in the pulp/fluff pulp used to manufacture wet wipes.
- The cellulose-based pulp/fluff must not be bleached with chlorine gas (Cl_2).
- Optical brighteners or fluorinated chemicals must not be added to the cellulose-based pulp/fluff.
- The cellulose-based pulp/fluff must not have a growth inhibiting effect on microorganisms, under test method EN 1104.
- Chemicals added to the finished cellulose-based pulp/fluff to provide specific properties* must fulfil the chemical requirements O1-O2** in the Chemical Module, version 3 or later***.

** Softeners that contain quaternary imidazoline (CAS No. 72749-55-4) are exempt from classification as Aquatic acute 1 H400, Aquatic chronic 1 H410, Aquatic chronic 2 H411 and Aquatic Chronic 3 H412 in the requirement O1 in the Chemical Module, version 3 or later.*

*** Production chemicals used during the production of the cellulose pulp are not included in the requirement.*

**** Ask the manufacturer/supplier of the chemical product to demonstrate compliance with the requirement in the web-based application tool, more information can be found from Pulp and Paper Declaration in the MSA Portal (nordic-swan-ecolabel.org).*

⇪ The manufacturer of the wipe carrier material must state name and manufacturer of the purchased cellulose based pulp/fluff that are used in the wet wipe.

⇪ The pulp manufacturer shall demonstrate compliance with the requirement in the web-based application tool.

⇪ If chemicals are added to the finished pulp/fluff:

⇪ The pulp manufacturer shall submit a list of the chemical products added to the finished pulp/fluff including name, manufacturer, function, and amount used (kg/ADt). Product safety data sheets for chemical products shall be included upon request.

⇪ The manufacturer/supplier of the chemical product shall demonstrate compliance with the requirement in the web-based application tool.

<u>Cellulose-based pulp/fluff pulp, fibre raw material</u> (≥ 10.0 weight-%)

The requirement consists of four parts that all must be fulfilled by the pulp manufacturer:

1. Restricted tree species

Nordic Ecolabelling's list of restricted tree species* consists of tree species listed on:

a) CITES (Appendices I, II and III)

b) IUCN red list, categorized as CR, EN and VU

c) Rainforest Foundation Norway´s tree list

d) Siberian larch (from forests outside the EU)

Use of tree species listed on a) CITES (Appendices I, II and III) is not permitted.

Tree species listed on either b), c) or d) may be used if they meet all of the following requirements:

- The tree species does not originate from an area/region where it is IUCN red listed, categorized as CR, EN or VU.
- The tree species does not originate from Intact Forest Landscape (IFL), defined in 2002 http://www.intactforests.org/world.map.html.
- The tree species shall originate from FSC or PEFC certified forest/plantation and shall be covered by a valid FSC/PEFC chain of custody certificates documented/controlled as FSC or PEFC 100% through the FSC transfer method or PEFC physical separation method.
- Tree species grown in plantation shall in addition originate from FSC or PEFC certified forest/plantation, established before 1994.

Exemptions

Eucalyptus and Acacia used for pulp and paper production are exempted from the list (note **).

** The list of restricted tree species is located on the website: www.nordic-ecolabel.org/wood/*

*** Regarding pulp, fibre raw material from eucalyptus/acacia must be a minimum of 70% certified.*

2. Species

The manufacturer of cellulose-based pulp/fluff must state the name (species name/scientific name) of the wood/fibre raw material used in the production of pulp.

3. Chain of Custody certification

All wood/fibre raw material and bamboo used in Nordic Swan Ecolabelled products must be covered by a valid Chain of Custody certificate in accordance with FSC/PEFC schemes.

The pulp manufacturer must be Chain of Custody certified in accordance to FSC or PEFC schemes.

4. Certified wood/fibre raw material and bamboo

On an annual basis/the latest 12 months, a minimum of 70 weight-% of all fibre raw material used in the cellulose-based pulp/fluff, must origin from forestry certified under the FSC or PEFC schemes.

The remaining proportion of fibre raw material must be covered by the FSC/PEFC control schemes (FSC controlled wood/PEFC controlled sources).

If several pulps are mixed, the certification percentage must be fulfilled for the finished pulp/fluff in the product. The proportion of certified fibre raw material in the finished pulp is calculated as a weighted total of the proportion in each constituent pulp.

- Declaration from the applicant/manufacturer/supplier that tree species listed on a-d) are not used.
- If species from the lists b), c) or d) are used:
- a Valid FSC/PEFC Chain of Custody certificate from applicant/manufacturer/supplier that covers the specific tree species and demonstrate that the tree is controlled as FSC or PEFC 100% through the FSC transfer method or PEFC physical separation method.
- The applicant/manufacturer/supplier shall document full traceability back to the certified forest unit thereby demonstrating that:
- The wood does not originate from an area/region where it is IUCN red listed, categorized as CR, EN or VU.
- The tree species do not originate from Intact Forest Landscape (IFL), defined in 2002 http://www.intactforests.org/world.webmap.html
- For plantations the applicant/manufacturer/supplier mustdocument that the tree species do not originate from FSC or PEFC certified plantations established after 1994.
- Pulp manufacturer shall describe names of the tree species used in the pulp/fluff.
- Regarding acacia/eucalyptus, documentation showing that the quantity of certified fibre in pulp is met. Pulp manufacturer must present a valid FSC/PEFC Chain of Custody certificate covering all fibre raw material used in the pulp/fluff.
- Pulp manufacturer shall enclose documentation such as audited accounting documents showing the amount of certified fibre raw material in the pulp/fluff is met. For the uncertified fibre raw material, proof that it is covered by FSC/PEFC’s control schemes (FSC controlled wood/PEFC controlled sources). Nordic Ecolabelling may request further documents to examine whether the requirements are fulfilled.

<u>Cellulose-based pulp/fluff, production requirements</u> (≥ 10.0 weight-%)

The cellulose-based pulp/fluff must fulfil the requirements O1-O6, O8-O16 in the Basic Module for Paper Products, version 3 and all the requirements in the Chemical Module, version 3, or corresponding requirements in later versions.

Fossil fuels

Fossil oil and coal must not be used as fuels* for production of process heat in the pulp/fluff mill.

Necessary use of fossil oil e.g. in planned maintenance stops, emergency maintenance stops, as a reserve and tip fuel (peak load fuel) or at start-ups for regulation of the combustion temperature in a heat and co-generation boiler is allowed.

** Use of natural gas and liquefied petroleum gas (LPG) is allowed.*

For the requirements concerning energy consumption and emissions, the following limits and reference values apply:

Energy

- $P_{electricity\_total} \leq 1.25$

  $P_{fuel\_total} \leq 1.25$
- The reference values for cellulose pulp are found in the Basic Module, version 3 or later.
- The reference values for fluff pulp are $El_{reference}$ = 780 kWh/ADt and $Fuel_{reference}$ = 5900 kWh/ADt. For mechanical fluff pulp (CTMP) the reference values are $El_{reference}$ = 1650 kWh/ADt and $Fuel_{reference}$ = 900 kWh/ADt.

  A more detailed description of documentation requirements and calculation methods is provided in Appendix 4 of the Basic Module, generation 3 or later, in which $P_{electricity}$ and P_{fuel} are also defined.

Emissions of greenhouse gases

- Emissions of greenhouse gases from fuels and electricity used for production of process heat must not exceed 350 kg CO_2/ADt. For mechanical fluff pulp (CTMP) the limit value for emissions of CO_2 is 100 kg CO_2/ADt.

  For pulp comprising a mixture of chemical pulps and mechanical pulps, a weighted limit value is calculated based on the proportion of each pulp type.

Emissions to water and air

Emissions of AOX from production of fluff/cellulose pulp must on average be ≤ 0.14 kg/ADt per pulp mixture. Emissions of AOX from the individual pulp must be ≤ 0.16kg/ADt.

Total emission points must be ≤ 4.0, and individual emission points must be ≤ 1.3. The reference values in the Basic Module shall be used*.

- $P_{emissions(total)} = P_{COD} + P_P + P_S + P_{NOx} \leq 4$

To calculate the individual emission scores for P_{COD}, P_P, P_S, and P_{NOx} and for reference values for difference pulp types, please refer to the Basic Module, generation 3 or later (Appendix 5, Table 5.1).

** For unbleached chemical pulp used in manufacturing of fluff pulp, the reference value of phosphorus is 0.03 kg/ADt.*

A more detailed description of documentation requirements and calculation methods is provided in Appendix 4 of the Basic Module, generation 3 or later.

⇪ The pulp manufacturer shall demonstrate compliance with the requirement in the web-based application tool. For the calculation of the energy and emissions to water and air, the pulp manufacturer shall use the spreadsheet provided by Nordic Ecolabelling.

⇪ If the pulp/fluff has previously been approved by Nordic Ecolabelling, state the name of the pulp.

Background to the requirements

Environmental impact of wet wipes is highly related to raw materials used as carrier material in wipes. Cellulose pulp/fluff pulps are one of those raw materials that may be used in wipes. The requirements for pulps are split into different levels, depending on the amount of pulp/fluff pulp present in the product. If the share of pulp/fluff pulp in the wet wipe carrier material is over 1 weight- %, then the requirement for cellulose-based pulp/fluff pulp is applied. If the share is over 10 weight-%, then also requirements for wood raw material and manufacturing are applied.

During the recent years, the focus in updating Nordic Swan Ecolabel requirements for pulp and paper related products has mainly been on reduced energy and greenhouse gas emissions. Consequently, the requirements for pulp/fluff pulp used in wipe carrier material are made more stringent than in the previous version of the Criteria for Cosmetics.

Compared with current requirements for pulp/fluff pulps, the following key changes have been introduced:

- Reference values for manufacturing of fluff pulp - consumption of fuel and electricity - have been tightened. Regarding fuel, from 6 000 kWh/ADt to 5900 kWh/ADt and for electricity from 900 kWh/ADt to 780 kWh/ADt.
- Reference values for the pulps in the Basic Module[5], generation 3 have been tightened.
- There is a new requirement for ban on fossil oil and coal used for production of process heat in the pulp/fluff pulp mill.
- The requirement for emissions of greenhouse gases has been changed. The greenhouse gas requirement only encompasses electricity and fuels used for production of process heat in the pulp mill. The electricity used for other

[5] https://www.nordic-swan-ecolabel.org/49399e/contentassets/1c6de06ec2624677a1f26e133645db09/basic-module-3.1_044_copy-and-printing-paper-044_english.pdf

purposes than to generate process heat is excluded from the requirement. The limit value is now set to 350 kWh/ADt.

The background document to the Basic Module, version 3 provides comprehensive information on the energy requirement and Appendix 4 in the Basic Module describes the calculations in detail. Nordic Ecolabelling also provides a spreadsheet that is to be used for these calculations.

Requirement for emissions to air and water and for fibre raw material are also tightened:

- Regarding emissions to water and air, limit value for individual point score has been tightened from 1.5 to 1.3. The reference values for all emission parameters, namely COD, P, S and NOx have been updated in the Basic Module. The weighted average value of AOX released from the mixed pulps must not exceed 0.14 kg/ADt pulp. AOX emissions from each individual pulp must not exceed 0.16 kg/ADt.
- Regarding the requirement for fibre raw material, the limit of certification has been increased from 30% to 70% in pulp/fluff pulp.
- There is also an updated requirement for restricted tree species not to be used in pulp/fluff pulp. Eucalyptus and Acacia used for pulp are exempted from the list. However, fibre raw material originating from Acacia and Eucalyptus plantations must be a minimum of 70% certified.

Major changes in the Chemical Module[6], version 3 also affect the manufacturing of pulp/fluff pulp:

- The requirement for classification of chemical products (O1) has been expanded with hazard class and hazard statement Aquatic Chronic 3 -H412.
- There is a new requirement for prohibited substances (O2), such as substances on the Candidate list shall not be ingoing substances in chemical products used in the production of pulp. Subsequently, some former requirements are removed, such as the requirement concerning residual monomers, as these are now covered by the new requirement.
- The definition of ingoing substances and impurities in chemical products has been updated, the limit for impurities in the chemical product is 1000 ppm.

Nordic Swan Ecolabel Criteria for Sanitary Products is under revision from generation 6 to 7 during 2024-2025. Nordic Ecolabelling reserves the right to adjust the requirements according to the criteria for Nordic Ecolabel Sanitary Products, generation 7 when it is implemented.

[6] https://www.nordic-swan-ecolabel.org/4b0281/contentassets/1c6de06ec2624677a1f26e133645db09/criteria-document-chemical-module-3.4_044_copy-and-printing-paper-044_english.pdf