

Consultation response for

Cleaning agents for use in the food industry



Generation 3

1 October 2025

Nordic Swan Ecolabelled Cleaning agents for use in the food industry
– Consultation response
070/3.0, 1 October 2025

1	Summary	1
2	About the consultation	1
3	Compilation of received responses	2
4	Comments to the criteria, in detail	2
4.1	General comments.....	2
4.2	Definition of the product group	5
4.2.1	What can carry the Nordic Swan Ecolabel?	5
4.3	Comments to the individual requirements	5
4.3.1	Appendices	14
5	Discussion and conclusion	14

1 Summary

The proposal for revised criteria for cleaning agents for use in the food industry was submitted for stakeholder consultation between 10 April and 11 June 2025. The consultation generated nine responses.

Many comments highlighted that surfactants classified as H412 are no longer exempt from the requirement concerning long-term environmental effects. Nordic Ecolabelling has not changed this requirement following the consultation but has clarified that the use of such surfactants is still permitted.

For a complete overview of the changes resulting from the consultation process and subsequent discussions, see Chapter 5: Discussion and Conclusion.

2 About the consultation

The proposal for revised criteria for cleaning agents for use in the food industry was submitted for stakeholder consultation between 10 April and 11 June 2025.

The consultation proposal included the following proposed changes:

- The product group definition has been clarified regarding the activities and NACE codes included.
- Cleaning agents used in catering kitchens have been excluded from the product group and moved to product group 026, Cleaning Products.
- The new EUH hazard classifications for endocrine disruptors, PBT/vPvB, and PMT/vPvM have been added to both the list of prohibited product classifications and the list of prohibited classifications for ingoing substances.
- Hazard classifications for specific target organ toxicity due to repeated exposure (STOT RE 1) and substances hazardous to the ozone layer have been added to the prohibited classifications for ingoing substances.
- The list of substances that are excluded from use in products has been extended.
- A new requirement has been introduced to exclude microplastics from products.
- The requirements for potential or identified endocrine disruptors, nanomaterials/-particles, and PBT and vPvB substances have been updated.
- Surfactants classified as H411 and H412 are no longer exempt from the requirement on long-term environmental effects. Additionally, the multiplying factor M for H410, as described in the CLP Regulation (EC) No 1272/2008, has been included in the calculation.
- The limit values for organic substances that are aerobically non-biodegradable (aNBO) and anaerobically non-biodegradable (anNBO) have been tightened, and the separate limit value for ready-to-use products has been removed.
- The limit value for Critical Dilution Volume (CDV) has been tightened, and the separate limit value for ready-to-use products has been removed.

- A new requirement has been introduced for primary packaging up to 20 litres, ensuring recyclability.

In this compilation, all comments are collected and answered by Nordic Ecolabelling. The purpose is, in addition to collecting all comments, to show how external comments have affected the requirements. Nordic Ecolabelling is grateful for all the answers that help us in our development and help us to ensure that the work on the criteria complies with the ISO 14024 standard.

3 Compilation of received responses

The consultation generated nine responses, distributed as follows.

Table 1: Compilation of responding organisations/companies

Denmark	Sweden	Finland	Norway	Iceland	International
Knud E. Dan A/S	Svenska Institutet för Standarder, SIS	KiiltoClean Oy	Lilleborg Solensis		BASF SE
Soap Nordic					Cefic - Phosphonates Europe
Iduna					
Miljøstyrelsen					

4 Comments to the criteria, in detail

4.1 General comments

Cefic - Phosphonates Europe

The criteria document presents a well-structured and thoughtful approach to promoting environmentally responsible cleaning agents for use in the food industry. It is a valuable and necessary step toward establishing adapted and relevant ecolabelling criteria that reflect the specific needs and challenges of this sector. The document demonstrates a commendable effort to integrate life cycle thinking, address key environmental hotspots, and align with evolving regulatory frameworks. We particularly appreciate the ambition to exclude substances of concern—such as endocrine disruptors, microplastics, and persistent, bioaccumulative, and toxic substances—and to promote biodegradability and recyclability. These are essential directions for ensuring that cleaning agents used in sensitive food production environments are both effective and safe for human health and the environment.

That said, we would like to express a note of caution regarding the scientific basis for some of the proposed exclusions and thresholds. It is crucial that the criteria rely on robust, peer-reviewed scientific studies that reflect realistic use conditions. Over-reliance on data derived from artificial or overly conservative experimental setups

may lead to unjustified restrictions that do not correspond to actual risk or performance in real-world applications. We believe that the credibility and long-term success of the ecolabelling scheme depend on maintaining a careful balance between precaution and scientific accuracy.

Overall, we believe this work is moving in the right direction and represents a constructive foundation for further dialogue. The document is both timely and relevant, and we look forward to contributing to its refinement.

Nordic Ecolabelling

Thank you for your comment. We appreciate your support for the overall ambition of developing relevant and environmentally sound criteria for cleaning agents used in the food industry. We are pleased to hear that you found the criteria document well-structured and aligned with key sustainability goals, including life cycle thinking and the exclusion of substances of concern.

We would, however, like to take this opportunity to clarify that our chemical requirements are generally hazard-based rather than risk-based, and that we apply the precautionary principle in our approach.

KiiltoClean Oy

Product changes in the food industry are not done without reason. This means that product safety is the most important, and changes may cause new validation requirements or uncertainties in processes. Now, the changes in the proposal are rather small in principle, but they would cause formulation changes to almost all the products in food industry portfolio.

Nordic Ecolabelling

Thank you for your comment. We understand that adapting to new requirements may, in some cases, require reformulation or adjustments in existing products. At the same time, we believe that one of the key purposes of ecolabelling is precisely to drive the market forward by encouraging innovation and the development of products with lower environmental impact.

If criteria could be met without any changes or improvements in existing formulations, we would not be fulfilling our role in promoting continuous progress toward sustainability.

That said, we always aim to strike a balance between ambition and feasibility, and we are grateful for the industry's input to help ensure that the criteria are both challenging and achievable.

Svenska Institutet för Standarder, SIS

SIS has reviewed the consultation from a standardization perspective. SIS has noted that the reference to the standard ISO CD 18749 is not correct. The standard was completed and published in 2004. The correct reference to the standard is therefore ISO 18749.

Nordic Ecolabelling

*Thank you for your comment and for pointing out the incorrect reference to the standard. The reference has now been corrected to the proper standard: **ISO 18749**.*

BASF SE

The strict definition of the ingoing substance is different than previously communicated from Nordic Swan to us. Additionally we see the definition of the ingoing substance very critical:

- Alignment with the EU-REACH definition simplification: use the same definition in every legislation
- In UVCB, even if a constituent is known, the content is difficult to determine.
- The end product is tested both toxicologically and ecotoxicologically, including the residual alcohol. Therefore, as the classification is given for the end product, it can be assumed that there is no danger to the environment, nor to a worker handling the product, nor to a consumer.

Additionally it is critical to reduce the cut off limit for formaldehyde to ≤ 25 ppm. This is overproportional strict and will limit many highly efficient EO containing surfactants in their use.

Furthermore I do not understand why this cut off limit is reduced: "Impurities in the raw materials in concentrations ≥ 1000 ppm (≥ 0.1000 w%) are always regarded as ingoing substances, regardless of the concentration in the Nordic Swan Ecolabelled product." It was always set to 10000 ppm ($\geq 1.0\%$). What is the reason behind to reduce it by a factor of 10?

Nordic Ecolabelling

Thank you for your comment.

- *Regarding the definition of ingoing substances, it has always been different from REACH seen from the perspective that we define ingoing substances and impurities individually, whereas REACH define a substance as a compound including its impurities. The new thing is that we have added an explanation and specified that the definition also applies to UVCB substances.*
- *All known constituents must be regarded based on the available information.*
- *Nordic Ecolabelling wants to exclude or limit certain substances that are suspected of having undesirable properties, even though these are neither hazardously classified nor on an authority-regulated list. Based on this precautionary principle the Nordic Swan Ecolabel aims for excluding all substances that are (or are suspected of being) harmful to the environment or to health.*

The lowered for formaldehyde is introduced because of formaldehydes volatile nature, and its allergenic and CMR properties. The cut-off limit has been adjusted to ≤ 50 ppm though.

The general impurity limits are supplemented by a specific impurity limit of 10,000 ppm (1.0000 w%) for individual raw materials. This was incorrect in the proposal and has been corrected in the final criteria.

4.2 Definition of the product group

4.2.1 What can carry the Nordic Swan Ecolabel?

Lilleborg Solenis

Vi mener at rengjøringsmidler brukt i storkjøkken hører hjemme under kriterier for Rengjøringsmiddel for næringsmiddelindustrien. Dette fordi både midler og metoder brukt her ligner eller er de samme som i næringsmiddelindustrien. Med storkjøkken mener vi der det produseres (lages mat) over lang tid (en hel arbeidsdag eller ofte over flere skift), som store kjøkken på hoteller, restauranter, sykehus, der det produseres mat som sendes videre til oppvarming på mindre "post" kjøkken. Her vil smussmengden bygges opp i løpet av produksjonstiden / åpningstiden og det er høye krav til hygiene for å sikre god holdbarhet på maten.

Nordisk Miljömärkning

Tack för er kommentar. Baserat på denna har vi beslutat att återföra rengöringsmedel för storkök till denna produktgrupp. Det förtydligas dock att storkök definieras som anläggningar där mat tillagas under längre tidsperioder – vanligtvis under en hel arbetsdag eller över flera skift – såsom i hotell, restauranger och sjukhus. Med storkök avses i regel inte mindre à la carte-restaurangkök, utan snarare anläggningar som är utformade för kontinuerlig livsmedelsproduktion i stor skala.

Miljøstyrelsen

Miljøstyrelsen støtter, at rengøringsprodukter til fødevaresektoren ikke må tilsættes parfume, og foreslår, at dette allerede fremgår i afsnittet "What can carry the Nordic Swan Ecolabel", at produkter med parfume ikke kan svanemærkes.

Nordic Ecolabelling

Thank you for your comment. Regarding perfume, we do not specify it in the product group definition, as it is not typically used in this type of products.

4.3 Comments to the individual requirements

O1 Description of the product

No consultation comments.

O2 Classification of the product

No consultation comments.

O3 Classification of ingoing substances

Cefic - Phosphonates Europe

We recommend reconsidering the exemption currently granted for NTA (nitrilotriacetic acid) as an impurity in MGDA and GLDA complexing agents, as

outlined in section O3, footnote **. The exemption allows NTA to be present in raw materials at concentrations below 0.2%, provided the final product contains less than 0.1% NTA.

However, this exemption appears inconsistent with the standard definition of impurities used throughout the criteria document, which states that substances present in concentrations ≥ 1000 ppm (≥ 0.1000 w%) in raw materials—or > 100 ppm (> 0.0100 w%) in the final product—should be regarded as ingoing substances and therefore subject to the same classification and exclusion requirements.

Given that MGDA and GLDA grades are available on the market that meet these stricter impurity thresholds, we believe the exemption is no longer justified.

Maintaining it could undermine the precautionary approach applied elsewhere in the criteria, particularly in relation to substances classified as carcinogenic (NTA is classified as Carc. 2 under EU regulations).

We therefore recommend deleting the exemption and aligning the treatment of NTA impurities with the general impurity thresholds defined in the document. This would ensure consistency, uphold the integrity of the ecolabelling criteria, and encourage the use of cleaner raw material grades that are already technically feasible.

Nordic Ecolabelling

Thank you for the information regarding the availability of MGDA and GLDA grades. As chelating agents are used in higher concentrations within this product group, we have decided not to introduce the change following the consultation. However, we plan to implement it going forward in other chemical-technical product groups.

Regarding the limit values for when impurities in raw materials are considered as ingoing substances, it was changed by mistake, and we will change it back to 10.000 ppm in the final version of the criteria.

Soap Nordic

Som du sikkert ved er der tale om at ethanol kan være kræftfremkaldende. Klassificeringen er ikke vedtaget endnu. Ethanol fordamper jo meget hurtigt og udgør ikke nogen reel fare ved normal brug.

Nordic Ecolabelling

Thank you for the information.

O4 Surfactants

No consultation comments.

O5 Preservatives

Knud E. Dan A/S

OK, Ikke nødvendigt med konserveringsmidler i denne produktgruppe da de ofte har høj eller lav pH.

Soap Nordic

Normalt er der ikke konserveringsmiddel i denne type produkter, da de fleste produkter er konserveret med højt eller lavt pH. Men der kunne være behov for konserveringsmiddel til produkter med neutralt pH. Logisk nok bør der være begrænsning eller evt. forbud mod MI og andre allergifremkaldende stoffer. Natriumbenzoate har begrænset ved pH over ca. 5,5. Phenoxyethanol eller kalium sorbat (begrænset virkning ved pH over ca. 6,0) er en mulighed. Der er også flere andre muligheder.

Nordisk Miljömärkning

Tack för era kommentarer. Eftersom det kan finnas behov av konserveringsmedel i neutrala produkter väljer vi att behålla detta krav. Vi har samtidigt infört ett generelltt förbud mot isothiazolinoner i krav O7 – Excluded substances.

O6 Phosphorus

Miljøstyrelsen

Fosfor (P): Det er Miljøstyrelsens forståelse, på baggrund af rapporten: https://www2.mst.dk/udgiv/publications/2010/978-87-92617-32-3/html/kap04_eng.htm mm. at zeolit og andre lignende alternativer kan blive/bliver benyttet i kombination med fosfater, for at nedsætte indholdet af fosfor i produkterne. Det er ukendt for Miljøstyrelsen, om det er muligt at sænke fosforindholdet yderligere end nuværende niveau på baggrund af brugen af zeolit og om hvorvidt denne nedsættelse er økonomisk proportionel, da der foreligger krav for nedfældning af fosfor for virksomheder og rensningsanlæg.

Nordisk Miljömärkning

Takk for kommentaren. I og med at det er knyttet en del usikkerhet rundt muligheten av å senke øvre grense for fosfor, beholdes kravet som det er i dag. Det er mulig vi vil se nærmere på dette ved neste revisjon.

O7 Excluded substances

BASF SE

Please see corrections and comments in text:

Ethylenediamine tetraacetate (EDTA, CAS No. 6381-92-6) and its salts and Diethylenetriamine pentaacetate (DTPA, CAS No. 67-43-6) and its salts

EDTA, DTPA and their salts are not readily degradable. Furthermore, ~~they are both~~ **DTPA** is classified toxic for reproduction and **may potentially** pose a risk to consumers*. For EDTA, the EU's risk assessment states that under the conditions at municipal water treatment plants EDTA is either not broken down or only breaks down to a slight degree. To-date in Europe, EDTA has been replaced in virtually all consumer products by readily biodegradable alternatives such as MGDA (methylglycine diacetic acid) and GLDA (glutamic acid diacetic acid). The requirement is unchanged compared to criteria generation 3.

* It is correct that DTPA is classified as reprotoxic to reproduction, but a risk for consumers in detergents is not established, effect levels being far too high to be

realistic. This classification does not apply to EDTA. Based on available studies on EDTA's, no adverse effects were found that would trigger a classification as reprotoxic. * A JRC report published in 2004 states: "We do not recommend classifying EDTA/Na₄EDTA as being a reproductive toxicant due to the following reasons: i) the malformations have been demonstrated at relatively high oral dose levels and ii) a steep dose response relationship can be assumed. No oral NOAEL for either developmental toxicity or maternal toxicity could be established". Also, the EU risk assessment does not conclude that such a classification would be justified. Only the lower biodegradability of EDTA may justify its exclusion in formulations with ecolabels.

NTA (nitrilotriacetic acid, CAS-no. 139-13-9) and its salts

NTA is classified as Carc cat. 2 (EU, 2008b) and is thus already prohibited in requirement O4 due to its classification. However, **the carcinogenic effect is low and a specific concentration (SCL) of 5% for classification was added in the CLP***. The complexing agents that replace NTA, **EDTA and DTPA** (GLDA and MGDA) contain small quantities of NTA as residues from raw material production (as attested in various safety data sheets for the raw materials). To encourage a transition to MGDA and GLDA, they may contain NTA impurities in the raw material in concentrations of less than 0.2% if the concentration of NTA in the product is below 0.1%. This is a new requirement in generation 4 of the criteria. ***Annex VI of Regulation (EC) No 1272/2008 for EC 225-768-6 (trisodium salt).**

Nordic Ecolabelling

Thank you for your comment.

We agree with the proposed changes to the text regarding EDTA/DTPA, but we do not wish to include the additional suggested wording.

We do not agree with your proposed revisions concerning NTA, as we do not find it appropriate to describe the cancer risk as "graduated" – in our view, even a small risk is serious.

Cefic - Phosphonates Europé

We appreciate the inclusion of phosphorus-related restrictions in Requirement O6, which aim to mitigate eutrophication and promote sustainable phosphorus use. However, we would like to raise a concern regarding the blanket exclusion of aminopolyphosphonates under Requirement O7, and the broader implications this has for phosphorus management and scientific consistency.

In particular, we believe that the rationale for excluding aminopolyphosphonates—such as DTPMP—based on their potential degradation into glyphosate, as referenced in recent studies, should be reconsidered in light of the scientific uncertainties and limitations of those studies. The Tübingen University research cited in this context presents a hypothesis that DTPMP degradation may contribute to glyphosate levels in surface waters. However, as detailed in the Phosphonates Europe statement on glyphosate in November 2024

(https://phosphonates.org/images/Phosphonates_Europe_statement_on_glyphosate.pdf), this hypothesis is based on laboratory conditions that do not reflect realistic environmental scenarios:

- The degradation experiments used highly artificial conditions, including pure water, excess manganese oxide, and buffered pH, which are not representative of natural aquatic systems.
- The maximum conversion rate of DTPMP to glyphosate under these conditions was only 0.16%, a negligible amount.
- The study did not attempt a mass balance analysis comparing actual DTPMP usage in detergents with observed glyphosate levels in surface waters, which would be essential to validate the hypothesis.
- Glyphosate and its metabolite AMPA are known to adsorb strongly to sludge in wastewater treatment plants, reducing their release into surface waters.
- Other well-documented sources of glyphosate—such as urban applications, improper equipment cleaning, and agricultural runoff—are not accounted for in the study.

Furthermore, the concentrations of glyphosate observed in surface waters (typically 0.1–0.5 µg/L) remain well below the proposed environmental quality standard of 86.7 µg/L, suggesting that the environmental risk from trace degradation of DTPMP is minimal.

In addition, a recent comment

(<https://www.sciencedirect.com/science/article/abs/pii/S0043135424018657?via%3Dihub>) was published by Tolkamp and Hofman-Caris, that also mitigates Schwientek et al. arguments and conclusions. We would deeply appreciate that this document is also considered in your argumentary.

Given these considerations, we recommend that Nordic Ecolabelling revisit the exclusion of aminopolyphosphonates in Requirement O7 and ensure that any restrictions are based on robust, realistic, and peer-reviewed scientific evidence. We also encourage alignment with the standard impurity thresholds defined in the document (≥ 1000 ppm in raw materials or > 100 ppm in the final product), which would allow the use of high-purity grades of MGDA and GLDA that do not pose a significant environmental risk.

This approach would maintain the scientific integrity of the ecolabelling criteria while supporting the use of effective and environmentally responsible complexing agents in cleaning formulations.

KiiltoClean Oy

Aminopolyphosphonates are used in the portfolio for food industry cleaning processes. In our opinion, aminopolyphosphonates should be used in cleaning products if the classification of the product does not cause extra harm. Otherwise, no comments.

Nordic Ecolabelling

Thank you for your comment. In Water Research 1 October 2024 there is the following concern: “As they are used in laundry detergents in Europe, but not in the USA, we hypothesize that glyphosate may also be a transformation product of aminopolyphosphonates.” Nordic Ecolabelling wants to exclude or limit certain substances that are suspected of having undesirable properties, by use of the precautionary principle. We therefore maintain the ban for this substance.

Miljøstyrelsen

Udelukkede stoffer: Miljøstyrelsen har forstået, at Sverige i EU-regi er ved at vurdere MEK for hormonforstyrrende effekter. Dertil kommer, at MEK har flere sundhedsskadelige klassificeringer. Såfremt Nordisk Miljømærkning har viden om alternativer til MEK, og der er et tilstrækkeligt udbud og marked for disse alternative denatureringsmidler, kan Miljøstyrelsen støtte, at Nordisk Miljømærkning fremmer markedet for disse alternativer via kriterierne. MEK bliver brugt i størstedelen af EU's lande som denatureringsmiddel, grundet regler for afgift på spiritus. Er der ikke alternativer, kan Nordisk Miljømærkning overveje, at undtagelsen kun dækker brugen af MEK som denatureringsmiddel for at sikre, at stoffet ikke tilsættes som opløsningsmiddel til svanemærkede detergenter.

Miljøstyrelsen bemærker, at PFAS og halogenerede organiske stoffer er anført som to separate stofgrupper, men PFAS er også halogenerede stoffer. Man kunne overveje i stedet at skrive "Halogenerede organiske stoffer, herunder PFAS". Det samme er gældende for organic chlorine compounds, som også tilhører gruppen af halogenerede organiske stoffer.

Nordic Ecolabelling

Thank you for your comment. The exception for MEK has now been removed.

For some product groups we will highlight especially PFAS and also organic chlorine compounds, that's why they are described separately.

O8 Microplastics

Miljøstyrelsen

Mikroplast: De tidsbegrænsede undtagelser nævnt i mikroplastrestriktionens stk 6, bør tilføjes som punkter i restriktionsbetingelserne, der ikke finder anvendelse i svanemærkets kriterier.

Nordic Ecolabelling

Tak for jeres kommentar. Vi har besluttet ikke at nævne afsnit 6 specifikt som en ikke-gældende begrænsningsbetingelse i Svanemærkets krav. Det skyldes, at det allerede fremgår, at kun afsnit 1, 2 og 3 er gældende. Desuden skulle kravteksten gerne gøre det helt klart, at der ikke findes nogen tidsbegrænsninger for kravet. For ikke at forvirre mere end højst nødvendigt vil vi gerne holde hjælpeteksten så kort som muligt. Afsnit 4 og 5 er specifik blevet nævnt, fordi mange producenter og licenshavere mistolker disse to begrænsningsbetingelser som værende undtagelser til definitionen på mikroplast. Dermed risikeres fejldeklARATIONER på polymerer, som i virkeligheden er mikroplast.

O9 Nanomaterials

No consultation comments.

O10 Long-term environmental effects

BASF SE

H412 derogation:

The revision of requirements, which now excludes surfactants classified under H412 from exemptions, represents the most critical change within this proposal. Although Sodium Lauryl Ether Sulfate (SLES) is no longer classified as H412, many other surfactants still fall under this classification, making it exceedingly difficult to formulate effective surfactants that are not labeled with H412.

The exemption for surfactants classified under H412 should be maintained, as these surfactants are already subject to stringent requirements for aerobic and anaerobic biodegradability. These requirements ensure that, the surfactants degrade rapidly, thereby mitigating their impact on the aquatic environment of a chronic toxicity. Furthermore, there is concern regarding the feasibility of identifying alternatives for surfactants classified under H412. This classification poses significant challenges in formulating effective and sustainable products from both an economic and performance standpoint, as there are currently no comparable surfactants available on the market.

Knud E. Dan A/S

Jeg forstår ikke hvorfor tensider med H412 nu ikke er undtaget mere, hvis de samtidigt er fuldt nedbrydelig.

Mange produkter som indeholder SLES (natrium lauryl ethersulfat). Dog kan kravet med de 40 gram pr liter forholdsvis let overholdes. Samme anioniske tensid indgår også i håndopvaske midler. og da jeg udfra at denne ændring også smitter af på de andre kriterier.

H412 burde fortsat være undtaget, hvis råvaren er fuldt nedbrydelig.

Nordic Ecolabelling

Surfactants classified as H411 and H412 are no longer exempt from the requirement; however, their use is still permitted. To accommodate the presence of such surfactants in products, the limit value has been increased (before consultation). This revised approach aims to align the requirement with other Nordic Swan Ecolabel criteria for chemical-technical products, while avoiding a general tightening of the overall requirement.

Miljøstyrelsen

Langvarige miljøeffekter: Vær opmærksom på Miljøstyrelsens vejledning om tilslutning af industrispildevand til offentlige spildevandsanlæg. En revision af vejledningen var i høring 15/11/2024-07/02/2025. Høringsdetaljer - Høringsportalen
Vejledningen indeholder kriterier, som myndigheden kan anvende ved vurdering af kemiske stoffer når der skal udstedes tilladelse til afledning af spildevand. Vejledningen er baseret på EUs Vandrammedirektivs krav til alle myndigheder i EUs medlemslande om at vurdere vandkvaliteten af udledt rensset spildevand til vandmiljøet. Nordisk Miljømærkning kan anvende den til at vurdere Svanemærkets kriterier for akvatisk toksicitet og langvarige effekter for vandlevende organismer. Kriterierne tager udgangspunkt i organiske stoffers H-sætninger tildelt efter CLP-

forordningen og inddrager derudover EU's liste over prioriterede og prioriterede farlige stoffer. Såfremt spildevandet indeholder rengøringsmidler til fødevarerektoren, skal myndigheden vurdere, hvorvidt rengøringsmidlerne lever op til disse kriterier, og på baggrund heraf ud fra en konkret vurdering af lokale forhold stille vilkår der sikrer overholdelse af miljøbeskyttelseslovens §28, hhv. stk. 1 eller stk. 3.

Nordic Ecolabelling

Thank you for the information.

O11 Biodegradability

Iduna

Vores konklusion må være at det primært er grænsen for CDV og kravet for anaerob nedbrydelighed som spænder ben for vores nuværende formuleringer.

KiiltoClean Oy

The change in the quantity of organic substances that are aerobically non-biodegradable (aNBO) that must not exceed cause problems in the formulation and may cause cleaning safety issues. We suggest that the quantities should be kept the same as earlier. Otherwise this will cause problems in using approved phosphonates and acrylate-based dispersing agents enough for safety purposes.

Nordic Ecolabelling

Thank you for your comments. We have adjusted the limit values to match those set in generation 2 of the criteria.

O12 Critical dilution volume (CDV)

Iduna

Stramning af CDV fra 30.000 til 20.000 svarer til en 33% reduktion, hvilket er for drastisk til at muliggøre effektive formuleringer til fødevarereindustrien – især når der indgår nødvendige stoffer som kompleksbindere. En grænse på 25.000 er måske et mere realistisk kompromis?

Fjernelsen af den særlige CDV grænse på 300.000 for RTU produkter er uproportionel og vist ikke begrundet i høringsforslaget. Dette gør det reelt umuligt at godkende produkter som grillrens, selvom de anvendes i små mængder og har høj effektivitet pr. brug. Grænsen bør genindføres for specialprodukter.

Nordisk Miljömärkning

Tack för kommentaren. Vi delar uppfattningen om att den föreslagna skärpningen var alltför kraftig och har därför justerat gränsvärdet till 25 000.

När det gäller RTU-produkter har den efterföljande processen visat att även dessa kan uppfylla kravet med en gräns på 25 000.

O13 Performance

No consultation comments.

O14 User information

No consultation comments.

O15 Packaging

Soap Nordic

Husk at næsten produkter vil være farlig gods. Pt. er der ikke nogen dunke der er godkendt til farligt gods og fremstillet af genbrugsplast. 200 liter tromler og 1000 liter IBC-tanke vaskes og genbruges normalt.

Nordisk Miljömärkning

Kravet omfatter bare emballasje opp til 20 liter. Det er ikke krav til gjenbrugsplast.

KiiltoClean Oy

The colour limitation of the closures suits us. Also other requirements are ok.

Knud E. Dan A/S

Forstår ikke kravet vedr hvor meget etiketten må fylde. Hvis den er i samme materiale som selve emballagen burde det jo ikke have nogen betydning.

Nordisk Miljömärkning

Krav om maksimalt areal som etiketten kan dekke gjelder emballasje av PET, der det også er krav om at etiketten må være laget av PE eller PP.

Miljøstyrelsen

Emballage: Miljøstyrelsen er interesseret i at høre, hvor der stilles krav til emballage op til 20 liter. Hvorfor lige 20 liter, og hvorfor ikke stille krav til større volumener emballage. Er det arbejdsmiljøkrav, der begrænser tunge løft? Nordisk Miljömærkning kunne med fordel redegøre for, hvorfor kravet kun gælder emballager op til 20 liter, ligesom man så fint redegør for baggrunden for andre dele af kravene. Såfremt der anvendes emballager over 20 liter, mener Miljøstyrelsen, at sådanne skal være omfattet af en tilbagebetalingsordning.

Nordisk Miljömärkning

Kravet omfatter emballasje med et volum på opptil 20 liter. Større emballasje leveres ofte til gjenbruk.

O16 Customer complaints

No consultation comments.

O17 Traceability

No consultation comments.

4.3.1 Appendices

Appendix 3

Miljøstyrelsen

Miljøstyrelsen mener, at Nordisk Miljømærkning bør inkludere OECD TG 321 over testmetoder, der kan anvendes til at bestemme BCF. 3 OECD TG 321 er lige så pålidelig som OECD TG 305. Hvis man anvender TG 321 i stedet for TG 305, anvendes ikke forsøgsdyr (fisk er forsøgsdyr, mens invertebrater ikke betragtes som forsøgsdyr).

Nordic Ecolabelling

Thank you for your comment. We will include the OECD 321 test to our list of approved test methods. The test has just been approved for use as a 'standard information requirement' under REACH as an alternative to OECD 305. Under the Regulations on Animal Testing, fish are considered test animals from the moment they start consuming food from their environment and must be fed, meaning that the bioaccumulation test with fish (OECD 305) is applicable as an animal test and requires special permission. OECD 321 provides a non-vertebrate test for bioconcentration in aquatic environments. This is in line with phasing out the use of test animals, including fish, where it is possible.

5 Discussion and conclusion

The consultation process has resulted in the changes presented in the list below. In addition, various editorial changes and clarifications have been made.

- The cut-off limit for formaldehyde in the definition of ingoing substances has been adjusted from ≤ 25 ppm to ≤ 50 ppm.
- Cleaning products for large-scale kitchens have been added back to this product group. It is clarified, however, that large-scale kitchens are defined as facilities where food is prepared over extended periods – typically throughout an entire workday or across multiple shifts – such as those found in hotels, restaurants, and hospitals. Large-scale kitchens generally do not include small à la carte restaurant kitchens, but rather facilities designed for continuous, high-volume food production.
- The list of substances that are excluded from use in products has been extended with isothiazolinones.
- The exception for MEK from the ban on potential or identified endocrine disruptors has now been removed.
- The limit values for biodegradability have been adjusted to match those set in generation 2 of the criteria.
- The CDV limit value has been adjusted upwards to 25,000 for all products. This continues to represent a reduction from the existing criteria, which set the limit at 30,000 (concentrated products) and 300,000 (RTU products).