

Consultation response document for

Dishwasher detergents and rinse aids



Version 7.0

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Nordic Ecolabelling of Dishwasher detergents and rinse aids – Consultation response document

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1 Summary

The consultation period ran from 8 March – 7 May 2021. In total 26 stakeholders commented on the proposal and an additional five answered that they refrain from commenting. Individual follow-up meetings were held with several stakeholders, for clarifying specific questions.

The idea of using recycled material and designing packaging for recycling seems to be generally accepted, but details cause concern and several adjustments and changes have been made, especially to the label requirements. The requirement on biodegradability of water-soluble films and the requirements on product performance also received several comments and have been adjusted.

Smaller adjustments and clarifications have been made to several other requirements. A table of the main changes that has been done in the criteria document after the consultation can be found in section 6.

2 About the consultation

This document consists of feedback received during the public consultation for revised criteria for dishwasher detergents and rinse aids, and Nordic Ecolabelling's response to the feedback. The purpose of this document is to show how external feedback has affected the development of the criteria in compliance with the ISO 14024 standard.

Nordic Ecolabelling is grateful for all incoming input that helped us in the development of environmentally ambitious as well as market based draft criteria.

The consultation was sent to all identified stakeholders in the Nordic region as well as to stakeholders in some other countries. The consultation period ran from 8 March – 7 May 2021. All stakeholders were invited to the public consultation webinar in the beginning of the consultation period. Separate meetings with some individual stakeholders were also held during the consultation period, on request.

Nordic Ecolabelling particularly requested feedback on the most important suggested changes compared to criteria generation 6:

- Certified materials from oil palms
- Water-soluble film. New requirement on ready biodegradability
- New requirements on recycled material and design for recycling of packaging
- Tighter limit values for the Weight-Utility Ratio – WUR and fill ratio
- Washing guidance on packaging

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 is compliant with the ISO 14024 standard.

3 Compilation of incoming comments and feedback

In total 26 stakeholders commented on the proposal and an additional five refrained from commenting. An overview of the respondents and their standpoints is given in table 1 below.

Table 1. Overview of respondents.

Consulting party	A. Just commenting	B. Supports the proposal	C. Supports the proposal with comments	D. Refrains from commenting	E. Rejects the proposal with justification
BASF SE			x		
Dagrofa ApS		x			
Diversey	x				
Energimyndigheten			x		
Folkhälsomyndigheten				x	
Forbrukerombudsmanen				x	
Grønt Punkt Norge	x				
IVAR IKS	x				
KiiltoClean	x				
Konsumentverket				x	
Kosmetik- og hygiejnebranchen	x				
Kosmetik- och Hygienföretagen, KoHF	x				
Orkla Home & Personal Care	x				
McBride	x				
Miljøministeriet, DK			x		
Monosol - Kuraray	x				
Naturvårdsverket				x	
Nopa Nordic	x				
Novozymes			x		
Procter & Gamble	x				
Reckitt Benckiser	x				
Roundtable on Sustainable Palm Oil – RSPO		x			
Senzora B.V.					x
SOK, Vähittäiskauppa	x				
Svensk Dagligvaruhandel	x				
Svensk Plastindustriförening, SPIF	x				
Svenskt Vatten	x				
Sveriges Kommuner och Regioner				x	
Unilever	x				
VKH – Dansk Industri	x				
Woodly Oy	x				
Total	19	2	4	5	1

4 Comments to the criteria, in detail

The various comments from the consultation parties have been inserted below and grouped in relation to the specific requirements. Nordic Ecolabelling has given a response to the comments and described if the requirement has been adjusted. If several stakeholders have given the same or similar comment, a common response is written to all. A table of the main changes that has been done in the criteria document after the consultation can be found in section 6.

4.1 General comments

Miljøministeriet

Ministeriet forventer at kunne stemme for kriterierne i denne udgave ved senere stillingtagen i Danmarks Miljømærkenævn, eller med ændringer der ikke væsentligt forringer miljøbeskyttelsesniveauet.

Indledningsvist gør ministeriet opmærksom på, at brugen af begreberne ”forbudt” eller ”forbyder” indikerer, at miljømærkekriterierne har en status af lovgivning. I stedet bør miljømærkekriterierne anvende begreber som ”udelukke” eller ”ekskludere”. Nedenfor er dog anvendt de overskrifter, der fremgår af udkast til kriterier.

Nordisk Miljömärknings kommentar

Nordisk Miljømærking takker for deres innspill og støtte. Begrepene er dog veletablerte innenfor våre ulike kriteriedokumenter. De gjelder kun for de aktuelle kriteriene for Svanemærking, uten relasjon til annen lovgivning.

Unilever

On a more general point, we acknowledge the need to update criteria and to keep up with changes and scientific development however, we would like to share our concern with the level of documentation which has increased massively through each criteria change. This documentation increases the burden on both the companies as well as the raw material producers and makes the criteria application process extremely burdensome for the companies. Unilever recommends a reduction in the amount of documents necessary for proving compliance and due to this burdensome work, would like to suggest 1.5 years transition from the current criteria.

Comments from Nordic Ecolabelling

Thank you for your input. Nordic Ecolabelling applies a minimum transition period of 12 months between criteria generations. The length of the transition period will be communicated at the time when the new criteria are published.

4.2 Produktgruppsavgränsning

4.2.1 Vad kan Svanemärkas?

Novozymes

We propose to include microorganisms to the criteria category.

Novozymes is also a manufacturer of microorganisms and we are experiencing an increasing interest in the market for utilizing microorganisms for cleaning purpose. Formulators have expressed interest in using microorganism to dishwasher detergents. Microorganisms will add a green profile to the detergent.

Microorganisms will be added as spores. The spores will germinate and during germination excrete enzymes that degrade organic material in the sump water in the machine. Keeping the machine clean will extend the life of dishwashers and thereby contribute to the sustainability agenda.

We proposed to include the criteria for microorganisms as specified in criteria document Cleaning products, Version 6.5 • 07 November 2018 – 31 October 2023, O9

Comments from Nordic Ecolabelling

Thank you for your input. Cleaning agents for dishwashers was investigated during Nordic Ecolabelling's evaluation of criteria generation 6 in the spring of 2020. It was found that the potential for the Nordic Swan Ecolabel to make an environmental difference within this product segment is too limited. Hence, we decided not to include cleaning agents for dishwashers in the criteria.

4.3 Comments to the specific requirements

4.3.1 Section 1, General requirements

O1 Description of the product

No comments

O2 Classification of the product

Unilever

O2: Classification of the product: The new criteria exclude products labelled with the EUH208 statement unless it is triggered by enzymes. Unilever recommends NOT to include this exclusion as it disproportionately punishes perfumes and requires manufacturers to review and reformulate a very small inclusion in the product which is a key driver for consumer decisions. Furthermore, with the current formats in dishwasher detergents, consumers are not exposed to perfumes and other allergens in dishwasher detergents.

Comments from Nordic Ecolabelling

Thank you for your input. Nordic Ecolabelling applies a strict line with respect to sensitizing substances. Most sensitizing substances are excluded already at ingoing substances level (see criterion O4). Most fragrances contain sensitizing substances, and some fragrances even have other unwanted effects on health and environment. A complete ban of fragrance ingredients is expected to markedly compromise the market penetration of ecolabelled dishwasher detergent and thus decrease the overall environmental benefit of the ecolabelled products. Therefore, Nordic Ecolabelling do not ban fragrances, but set strict requirements. Nordic Ecolabelling considers exclusion of products labelled with EUH208 due to fragrance ingredients to be well in line with our other fragrance requirements (see criterion O7).

McBride
OK requirement

Comments from Nordic Ecolabelling
Thank you for your support.

4.3.2 Section 2, Requirements for ingoing substances

O3 Certified raw materials from oil palms

McBride
Ok requirement.

Surfactants contain palm kernel oil derivivate.
McBride are RSPO members with chain of custody accreditation to supply sustainable palm derivative products via the use of a mass balance system.

Comments from Nordic Ecolabelling
Thank you for your support.

Miljøministeriet

Nordisk Miljømærkning foreslår tre niveauer af RSPO sporbarhedscertificering af palmeolie og palmeoliederivater: "Mass Balance", "Segregated og "Identity Preserved". Miljøministeriet foreslår i den forbindelse, at kriteriet udvides, så man anerkender "RSPO og lignende sporbarhedscertifikater".

Ligeledes foreslår Miljøministeriet, at der for palmeolie – og i det omfang palmeolie anvendes som ingrediens i maskinopvaskemidler – sker en skærpelse af niveauet for sporbarhedscertificering, således at der fra 1. januar 2025 alene for palmeolie accepteres "Segregated" og "Identity Preserved".

Samme linje anvender EU-miljømærket Blomsten for kosmetikkriterier.

Nordisk Miljömärknings kommentar

Takk for deres innspill. Nordisk Miljømerking har foreløpig bare gjort en bedømming av RSPO sporbarhetssertifisering vedrørende palmeolje. Dersom vi skulle motta spesifikke ønsker om godkjenning av andre sporbarhetssystemer, så vil vi gjøre særskilte bedømminger av de aktuelle standardene.

Per i dag ser det ikke ut til å finnes tilstrekkelig med råvarer tilgjengelig, dersom man skulle ekskludere «Mass Balance». Vi vil vurdere å kreve dette ved fremtidige revisjoner.

SOK, Vähittäiskauppa

SOK welcomes the requirement that palm oil, palm kernel oil and palm oil/palm kernel oil derivatives must be certified according to RSPO.

Comments from Nordic Ecolabelling
Thank you for your support.

Unilever

O3: Certified Raw materials from oil palms: Nordic Swan draft criteria require that producers of Dishwasher detergents must be able to show through invoices/ delivery notes that the palm oil purchased is certified and be able to share information on the

traceability. Unilever recommends NOT to include this requirement due to the difficulty to execute this in the factories for each ingredient delivery. Furthermore, palm oil and its derivatives are not typical ingredients in dishwasher detergents but can be raw materials in individual chemicals productions.

Comments from Nordic Ecolabelling

Thank you for your comment. We agree that it would be burdensome to share invoices /delivery notes for every single delivery. That was not our intention. We will reformulate the documentation requirement, to clarify this.

Diversey

In regards to the proposal for the dishwasher detergents and rinsing agent 017v7, could you please clarify on the following points? Palm oil: reconfirmation that Book & claim scheme is not possible

Comments from Nordic Ecolabelling

Yes, our proposal is to not accept book & claim.

O4 Classification of ingoing substances

McBride

New transition period (date) is missing in the criteria.

Comments from Nordic Ecolabelling

Thank you for your input. The transition period is normally not stated in the criteria. The transition period will, in effect, be the period when both generation 6 and 7 of the criteria documents are valid simultaneously. Nordic Ecolabelling applies a minimum transition period of 12 months between criteria generations.

Unilever

O4: Classification of ingoing substances: The Nordic Swan draft exempts stabilizers and preservatives in colorants added to dishwasher detergents from CMR requirements. Unilever views this exemption as disproportionate as colorants in dishwasher detergents have no function in the product. Unilever recommends NOT to exempt stabilizers and preservatives in colorants.

Comments from Nordic Ecolabelling

Thank you for your input. However, please note that preservatives and colorants are not exempt from CMR classification. They are only exempted from the respiratory or skin sensitization requirements.

Reckitt Benckiser

- Can you please clarify how TiO₂ is restricted by this requirement as it is not classified as Carcinogenic when bound to a matrix e.g. in enzymes? TiO₂ is classified as H351 (inhalation) only if in powder form containing 1 % or more of particles with aerodynamic diameter ≤ 10 µm.
- If all chemicals in all forms are restricted regardless of if the classification is related to state/form. How would this impact the usage of eg.. ethanol with its potential classification of CMR?

Comments from Nordic Ecolabelling

Thank you for your input. Please refer to the background document that was on consultation together with the criteria document: "Titanium dioxide: [in powder form containing 1 % or more of particles with aerodynamic diameter $\leq 10 \mu\text{m}$] is classified as carcinogen category 2 by inhalation by the 14.ATP of CLP. In addition, the mandatory warning EUH212 is required on the packaging of solid mixtures containing 1 % or more of titanium dioxide. The mandatory EUH212 applies regardless of titanium dioxide particle size, implying that particles with aerodynamic diameter $\leq 10 \mu\text{m}$ may be released from any solid mixture containing titanium dioxide when used. These particles, "known to be released from ingoing substances" are counted as ingoing substances according to Nordic Ecolabelling's definition (cf. "General requirements" in the criteria document). Accordingly, all titanium dioxide occurring in solid mixtures (regardless of size) is prohibited."

By default, ethanol will be prohibited as well, if classified and if not explicitly exempted in the criteria.

O5 Prohibited substances

Miljøministeriet

Miljøministeriet støtter, at bl.a. methylisothiazolinon (MI) udelukkes.

PFAS (s. 13). Miljøstyrelsen *Kemikalier* gør opmærksom på, at der tilsyneladende er en uoverensstemmelse mellem den nordiske og engelske udgave i følgende sætning: "Stoffene er svært persistente og brytes lett ned av kroppen / The substances are extremely persistent and are easily absorbed by the body". I den nordiske udgave, skal "brytes lett ned" erstattes med "optages/absorberes lett".

Det kan med fordel også tilføjes kriteriet, at PFOS, PFOA og stoffer, der kan nedbrydes til disse to stoffer, er forbudte at anvende i henhold til POP-forordningen.

Hormonforstyrrende stoffer (s. 11+16). Miljøministeriet støtter kriteriet, men har følgende kommentar ved *MST Kemikalier*: Det skal bemærkes, at listerne på edlists.org er dynamiske, hvilket betyder, at stoffer løbende kan tilføjes, fjernes eller flyttes listerne i mellem. I øvrigt, omfatter samarbejdet om initiativet på nuværende tidspunkt ikke alle EU medlemsstater. Initiativet er frivilligt at deltage i og tæller foreløbigt seks medlemsstater i EU. Dette kan med fordel præciseres i formuleringen: På grunn av disse forholdene utelukker miljømerket Svanen identifiserte og mulige hormonforstyrrende stoffer som er oppført i initiativet «Endocrine Disruptor Lists» for medlemsstatene i EU, som er tilgjengelig på <https://url12.mailanyone.net/v1/?m=1lf2gC-0002lt-3z&i=57e1b682&c=NOEu7Xj9ikWnkqOYDtzM4HKPirvggva6Od77dDc40QIoyzhrb5hjQo5lBN3PDV7RsPONc3OYO-2qRutvutS5QnJHlPTaj7dneUDmavGqonJXogD9v93gIVHtKZi8UZqoad1cCoTlmko-tBpPrtmBPHrzAUVh-pFaXV4M6NJSCAT1yrBQO4jAiIRVQDoI3udQyOoYf6DeBb5wOt1yVPnZDA>.

PBT og vPvB (s. 17). Miljøministeriet støtter kriteriet, men Nordisk Miljømerking bør fremadrettet være opmærksom på PMT og vPvM-stoffer, idet der ifølge EU's 'Chemical Strategy for Sustainability' (<https://ec.europa.eu/environment/pdf/chemicals/2020/10/Strategy.pdf>) forventes at skulle introduceres under REACH artikel 57 kategorier for PMT og vPvM-stoffer, der

således bliver særligt problematiske stoffer (SVHC'er) (strategien p 13): *introduce endocrine disruptors, persistent, mobile and toxic and very persistent and very mobile substances as categories of substances of very high concern;*

Kriterier er for PMT og vPvM stoffer er først ved at begynde at blive diskuteret i EU. KOM har ikke selv lagt noget frem, men Tyskland har lagt et forslag til kriterier frem: <https://www.umweltbundesamt.de/publikationen/protecting-the-sources-of-our-drinking-water-the>

DK/DTU har lavet en faglig rapport om brug af in silico identifikation af stoffer registreret under REACH ved brug af de af Tyskland foreslåede kriterier: <https://orbit.dtu.dk/en/publications/how-many-potential-vpvm-pmt-substances-have-been-registered-under>

Nordisk Miljömärknings kommentar

Vi takker for støtten og presiseringene. Vi vil rette opp feilen om PFAS i den nordiske teksten. Vi vil presisere at initiativet «Endocrine Disruptor List» er frivillig i bakgrunnsteksten. For øvrig vil vi også fjerne referansen til EU kommisjonens liste fra 2007.

Procter & Gamble

We would recommend using the scope confined to only confirmed Endocrine Disruptors (ED) (The EU member state initiative "Endocrine Disruptor Lists", List I) for excluding potential.

Unilever

O5: Prohibited substances: The New requirement excludes Potential or identified endocrine disruptors according to the EU commissions list of substances prioritized for evaluation of endocrine disrupting properties category 1 and 2 as well as the EU member state initiative "Endocrine disruptor lists". Unilever recommends to focus only on Identified Endocrine disruptors as a means to build some predictability in the product development process of dishwasher detergents.

Comments from Nordic Ecolabelling

Thank you for your comments. However, based on the precautionary principle, Nordic Ecolabelling finds it relevant to exclude also the potential endocrine disruptors.

Reckitt Benckiser

Note that foils/films wrapping tablets and similar generating microplastics may not be Nordic Swan Ecolabelled.

- How can this be proved and enforced?
- Essentially all plastic packaging has the potential to generate microplastic, the requirement should therefore be removed as this would restrict all plastic packaging.

Comments from Nordic Ecolabelling

Thank you for your input. Nordic Ecolabelling agree that this part of the requirement is unprecise. Since the concern about foils and films generating microplastics is already handled in the newly introduced requirement O14 Water soluble films, the referred sentence can be removed from the criteria and background document.

Svensk Vatten

Mycket bra att med ett generellt förbud för PFAS så att det även får med kortkedjiga PFAS. Även kravet på att inte antimikrobiella eller desinficerande ämnen får tillsättas i annat syfte än konservering ser vi som mycket bra. Bra att det finns krav på mikroplaster och att de förbehåller rätten att definitionen kan komma att ändras. Nödvärdigt att definitionen för mikroplast även innebär att det inte heller är tillåtet med plastgranuler i /som maskindiskmedel. Mycket vanligt för grovdisk i restaurang/storkök sedan 5-10 år tillbaka – kan även bli en trend för hemmadiskmaskiner. Plastgranulerna slites ned via erosion, och därmed bildas det kontinuerligt en stor mängd slitagepartiklar = mikroplaster. Se exempelvis även: <http://miljobarometern.stockholm.se/miljomal/mikroplast/plasthantering-vid-olika-verksamheter/9-5-utreda-anvandandet-av-plastgranulat-i-storkoksdiskmaskin/> och <https://wexiodisk.com/a/granulat> och <https://www.tingstad.com/se-sv/alla-kategorier/kunskapscenter/rengoringsguider/diskskola> Även kravet på att inte antimikrobiella eller desinficerande ämnen får tillsättas i annat syfte än konservering ser vi som mycket bra.

Nordisk Miljömärknings kommentar

Takk for deres innspill. Vi er enige i at det er høyst uønsket med slike plastgranuler i maskinoppvaskmidler for forbrukere. Vi mener dog at det ikke er relevant å presisere dette særskilt i disse kriteriene, som kun omfatter forbrukerprodukter. Dels er sådanne plastgranulater kun anvendelige i store industrielle maskiner p.t. og dels er det noget de køber ind ved siden af vaskemidlet.

McBride

OK requirement.

Comments from Nordic Ecolabelling

Thank you for your support.

O6 Phosphorous

Kosmetik- og hygiejnebranchen

Den foreslåede grænse for fosfor er for lav til at fremstille effektive produkter, der indeholder fosfonat. Indholdet skal være mindst 0,2 g fosfor pr. dosis for at opnå en tilstrækkelig effektivitet.

Kosmetik- och Hygienföretagen, KoHF

Den föreslagna begränsningen för fosfor är för låg för att kunna tillhandahålla effektiva produkter som innehåller fosfonat. Många produkter baseras just på fosfonat. Halten skulle behöva vara minst 0,2 g fosfor per dos.

Reckitt Benckiser

The total amount of phosphorous must not exceed the following: Dishwasher detergents $\leq 0.10\text{g p/wash}$.

- Reco to set at 0,2g p/wash

Comments from Nordic Ecolabelling

Thank you for your input. Our intention was to align the phosphorous limit with the Swedish legislative limit for phosphorous (cf. regulation 2010:267) in phosphate-containing dishwasher detergents. Based on your input, we will change the limit back

to 0,20 g p/wash. For the sake of clarity with relation to the Swedish regulation 2010:267, we will add phosphates to the list of prohibited substances (O5).

Svenskt Vatten

Med risk för att jag inte har tillräcklig produktkänedom, så undrar vi varför man inte i dessa krav har ett fosfatförbud som man valt att ha i Maskindiskmedel för professionellt bruk?

Nordisk Miljömärknings kommentar

Takk for innspillet. Med såpass lave grenseverdier for fosfor som 0.10 eller 0.20 g P/vask, vil det i praksis ikke bli benyttet fosfat i produktene. Mengden fosfat som er nødvendig for å gi ønsket effekt i produktene vil resultere i langt høyere fosfornivåer. Vi har allikevel besluttet å legge inn et fosfatforbud, for å tydeliggjøre forholdet til den svenske forordningen 2010:267, som begrenser fosfor spesifikt for fosfat-holdige produkter (jfr. vårt svar til Reckitt Benckiser over).

McBride

OK requirement

Comments from Nordic Ecolabelling

Thank you for your support.

07 Frangrances

McBride

OK requirement

Comments from Nordic Ecolabelling

Thank you for your support.

Svenskt Vatten

Vi är generellt mot onödig tillsats av parfym i konsumentprodukter, så nya kravet att det inte tillåts i spolglans och förpackningar är bra.

Nordisk Miljömärknings kommentar

Takk for støtten.

08 Enzymes

No comments

09 Colourants

No comments

4.3.3 Section 3, Dosing, ecotoxicity and biodegradability

O10 Maximum dosage

Kosmetik- og hygiejnebranchen

Den maksimale dosis bør også opdeles i forskellige kategorier, såsom pulver og tabletter. Tabletter kan i mange tilfælde være mere koncentrerede end pulver.

Kosmetik- och Hygienföretagen, KoHF

Den maximala dosen bör även delas upp för olika kategorier, såsom pulver och tabletter. Tabletter kan i många fall vara något mer koncentrerade än pulver.

Nordisk Miljömärknings kommentar

Takk for innspillet. Basert på tilgjengelig lisensdata mener vi dog at det er hensiktsmessig med samme maksimale dose. Derfor velger vi å opprettholde den foreslåtte inndelingen, som er uendret fra kriteriegenerasjon 6.

Reckitt Benckiser

- Would be possible to have tabs separated from Powders/gels in regards to dosing?

RECO: reduce CDV and dosage by 5-10%

Comments from Nordic Ecolabelling

Thank you for your comment. The suggested limits and categories are equal to the current criteria (generation 6). Based on a review of currently Nordic Swan Ecolabelled products, it is our opinion that these are still relevant.

O11 Long-term environmental effects

Novozymes

We object to the draft proposal of lowering the maximum allowed concentration of substances classified with H410, H411 or H412 from 0.1 grams/ wash to 0.06 grams/ wash.

The REACH registration scheme has helped identifying substance that may have a negative impact on the environment. As consequence substance classification is changing for many raw materials.

Novozymes is both a manufacture and formulator of enzymes. As formulator we are down-stream user of chemicals and have noticed that suppliers have changed classification for many substances. Many of the substances are critical for stabilization of enzymatic mixture and substitution is a long process. It requires reformulation, performance test and stability studies of the enzyme mixture.

For the detergent formulators a changed enzyme product composition will also require new performance test, stability studies and may also require reformulation.

Lowering the maximum allowed concentration of substance classified as hazardous to the aquatic environment will have huge business impact to the whole supply chain the detergent industry.

Comments from Nordic Ecolabelling

Thank you for your comment. The proposed reduction from 0.1 to 0.06 grams is based on a review of license data for currently Nordic Swan Ecolabelled dishwasher detergents. We do not find it reasonable to back on this proposal, based on unspecified assumptions of possible reclassifications. However, if reclassification of specific substances, which are essential to the category of dishwasher detergents, are about to take place, we will be willing to look into the topic. Possible approaches might be exemptions for those specific substances, or to consider a new adjustment of the limit value. Please note that the approach of exemption has already been applied for subtilisin and surfactants classified with H412.

McBride

OK requirement

Comments from Nordic Ecolabelling

Thank you for your support.

Svenskt Vatten

Krav 011 och 012: skärpta gränsvärdena i båda kraven ser vi som mycket positiva samt användandet av kroniska data i krav 012.

Nordisk Miljömärknings kommentar

Takk for støtten.

O12 Critical dilution volume (CDV)

BASF

I think it is critical that the CDV should only be calculated with chronic data, as for quite some products the chronic data are missing. Additionally – and even worst – for new and innovative products, there are often no chronic data available.

This can stop or delay the implementation of new products which are better for the environment.

I hope that the term “if TF chronic is lacking, TF acute can be used” means that still both values can be used equal – not only in these criteria but also in the future.

Comments from Nordic Ecolabelling

Thank you for your comment. This option indeed applies to the TF chronic calculation in all our current criteria.

Kosmetik- og hygiejnebranchen

Stramningen for indholdet af CDV er for stor. Disse kan ikke opfyldes for en stor del af produkterne på markedet. CDV bør ikke være lavere end 30.000 for maskinopvaskemidler og 5.000 til afspændingsmidler.

Kosmetik- och Hygienföretagen, KoHF

Skärpningarna för CDV är för stora. Vi har fått synpunkter på att dessa inte går att uppfylla för en stor del av produkterna på marknaden. CDV bör inte vara lägre än 30 000 för multifunktionsprodukter och 5 000 för spolglans.

Orkla Home & Personal Care

Vi har ingen Svanemerket glansmidler i dag, men ser på mulighetene for det.

Kommentarer fra underleverandører:

CDV-grense på 3000 for glansmidler kan bli et problem da det samtidig innføres krav til test mot Rinse Aid formula III, som inneholder 15% tensid. For å komme under 3000 i CDV-verdi, kan en typisk ha rundt 5-7% tensid, og ser at en formulering med kun halve mengden tensid vil ha vanskelig mot å bestå testen mot et testmateriale med dobbelt så mye tensid.

Nopa Nordic

CDV 3.000 for rinse aid vil bli et problem, især når der samtidig indføres krav til test mod Rinse Aid formula III, der indeholder 15% tensid. Vi vil typisk kun kunne have 5-7% tensid for at komme under 3.000 i CDV. En formulering med kun halvt så meget tensid vil have meget svært ved at bestå testen.

VKH – Dansk Industri

O12 CDV. CDV skal nu udelukkende beregnes ved hjælp af kroniske værdier, og grænseværdierne er skærpede for alle 3 typer af produkter.

Det skal bemærkes, at CDV 3.000 for rinse aid vil blive et problem for vores medlemmer, især når der samtidig indføres krav til test mod Rinse Aid formula III, der indeholder 15% tensid.

Reckitt Benckiser

- Reducing the CDV for multifunction detergents by 30% will drastically impact efficacy and innovation of ecolabelled products.

RECO: reduce CDV and dosage by 5-10%

- Rinse Aid CDV will be reduced by 70%
 - Technically that would correspond to almost water and no room for any surfactant....
 - **Reco:** Decrease to no lower than 5000 L/wash

Comments from Nordic Ecolabelling

Thank you for your comments on CDV. Please note that the limit values relate to the DID-list of 2016, which in general results in lower CDV values than for calculations based on the DID-list of 2014. We consider the suggested limits for dishwasher detergents as reasonable, based on the data for products that are currently ecolabelled with the Nordic Swan using DID 2016.

The limit of 3000 L/wash for rinse aids was based on a small number of products. We agree to raise the limit according to your recommendation, to 5000 L/wash.

McBride

OK requirement

Comments from Nordic Ecolabelling

Thank you for your support.

Svenskt Vatten

Krav 011 och 012: skärpta gränsvärdena i båda kraven ser vi som mycket positiva samt användandet av kroniska data i krav 012.

Nordisk Miljömärknings kommentar

Takk for støtten.

O13 Surfactants

Procter & Gamble

We suggest defining chemical as a surfactant based on the function it plays in the product.

Comments from Nordic Ecolabelling

Thank you for your input. Nordic Ecolabelling finds it reasonable to apply the term of surfactant as it is described in the Detergents Regulation (EC) No 648/2004. This is already stated in appendix 3. We will specify this in the background to criterion O13 as well.

Unilever

O13: Surfactants: Unilever questions why surfactants in dishwasher detergents only have strict requirements placed on aerobic biodegradability as opposed to laundry detergents where there are strict requirements on both aerobic and anaerobic biodegradability for surfactants in the detergents. Unilever recommends that, for proportionality reasons, all surfactants in dishwasher detergents should be required to be both aerobically and anaerobically biodegradable.

Comments from Nordic Ecolabelling

Thank you for your input. Please refer to the background document that was on consultation together with the criteria document: "During the pre-consultation period we investigated whether to extend the requirement of anaerobic biodegradability to all surfactants regardless of classification (in line with i.a. generation 8 of our laundry detergent criteria). Several stakeholders commented that this would limit the choice of surfactants that are particularly effective within this product group. It could potentially lead to a burden shift requiring e.g. more chemicals to maintain the product performance. Hence, we have decided to maintain the requirement as in generation 6 of the criteria."

O14 Water-soluble film

Kosmetik- og hygiejnebranchen

Kriterierne angiver, at testen for bionedbrydelighed skal udføres på den film, der leveres til producenten af opvaskemiddel. Dette indebærer en ekstra administrativ procedure og ekstra omkostninger. Vi mener, at leverandøren af filmen skal kunne godkende, at filmen opfylder kravene. Testen skal derfor udføres af filmproducenten og ikke producenten af opvaskemiddel.

Vi ønsker også at præcisere, at en vandopløselig film ikke er omfattet af begrebet mikroplast i henhold til EU's begrænsningsforslag, fordi den netop er vandopløselig. Da film er vandopløselig, giver den heller ikke nogen frigivelse af mikroplast.

Kosmetik- och Hygienföretagen, KoHF

Kriterierna menar att testet för bionedbrytbarhet ska utföras på den film som levereras till tillverkaren av maskindiskmedel. Detta innebär en extra administrativ procedur och extra kostnader. Vi anser att leverantören av filmen bör kunna godkänna att filmen uppfyller vissa krav. Testet bör således göras av filmtillverkaren och inte tillverkaren av maskindiskmedel.

Vi vill också förtydliga att en vattenlöslig film inte omfattas av begreppet mikroplast enligt EUs begränsningsförslag eftersom den är just vattenlöslig. Eftersom filme är vattenlösliga ger den inte heller upphov till något utsläpp av mikroplast.

Nordisk Miljömärknings kommentar

Tak for jeres input. Det er kravets ordlyd der ikke har været præcis nok, for det har hele tiden været meningen at leverandøren skal kunne stå for testen. Kravet blev formuleret på denne måde, for at sikre at der blev testet på den totale af filmen, og ikke blot PVA i sig selv, da additiverne har stor indflydelse på bionedbrydeligheden. Dette vil blive præciseret i den endelige kravtekst.

Nordisk Miljømærkning er opmærksomme på at vandopløselige film ikke er omfattet af ECHA's begrænsningsforslag, ej heller Nordisk Miljømærknings definition. Referér venligst til baggrundsteksten hvor det er beskrevet: Water-soluble films (e.g. poly vinyl alcohol, PVA) that encapsulate the dishwasher detergent is not considered microplastics according to the definition used in this criteria (see Prohibited Substances), as the definition is based on the term "insoluble". However, PVA is still a plastic and Nordic Ecolabelling would like to ensure that it is biodegradable in the aquatic environment.

The environmental fate of PVA depends on various factors, e.g. water solubility, composition and environmental conditions such as microbial populations.

(...)

A review from 2011 based on 68 scientific studies on identification and quantification of microplastics from the marine environment, found PVA in three studies¹. A large-scale survey of microplastics in Mediterranean waters in 2016, identified sixteen different classes of synthetic materials. Here, PVA accounted for 1,2 % of the microplastics.

Eftersom PVA er en plast som kan forefindes i miljøet, ønsker vi at sikre at den er bionedbrydelig. Derfor fastholdes kravet.

McBride

A longer transition period may be required based on supplier response.

Comments from Nordic Ecolabelling

Thank you for your input. Nordic Ecolabelling applies a minimum transition period of 12 months between criteria generations. The length of the transition period will be communicated at the time when the new criteria are published.

Monosol – Kuraray

As a supplier of Poly-vinyl alcohol-based films for detergent applications, we have a very unique perspective on the nature and intrinsic nuances of the PVA molecule which we wanted to share with you during this comment period.

Quoting a recent publication, co-authored by me along with collaborators from industry, "Questions and potential misperceptions have arisen about the potential contribution of liquid detergent capsules to the environmental microplastics issue.

¹ Hidalgo-Ruz, V., Gutow, L., Thompson, R. C., & Thiel, M. (2012). Microplastics in the marine environment: a review of the methods used for identification and quantification. Environmental science & technology, 46(6), 3060–3075. <https://doi.org/10.1021/es2031505>.

The film of these detergents is highly water soluble, also in cold water, as it must fully dissolve during every type of washing process. Water-soluble grades of polyvinyl alcohol, the most commonly used detergent capsule film material, are recognised to be biodegradable” (ref: <https://www.degruyter.com/document/doi/10.1515/tsd-2020-2326/html>) . This serves to highlight the fact that PVA is not one single type of molecule and considering the vast amount of research and product development work ongoing in this field, it is incorrect to define a very narrow set of criteria for all PVA-based films. This may result in constricting the development of new products that are meant to advance the safe and benign use of this type of product form because of the limitations set around one single type of PVA.

In the attached study, the extent of biodegradation after 28 days was 60.4% on average across the six materials. Across the studies, the 28 days value ranged quite broadly, from 38% up to 86%. As outlined in the paper, different study protocols had been used, that are fundamentally equivalent but that nevertheless could result in a different duration of the lag phase or different kinetics. As such, the relevant result to be compared across the studies is the eventual biodegradation percentage, rather than what happens during the first weeks of the study. For 2 out of the 6 materials, the 60% threshold was not reached within 28 days. However, for these specific film materials, the enhanced OECD 301B protocol had been applied with measurements continuing up to 60 days. **This showed a biodegradation extent well above the 60% threshold in both cases, demonstrating that the result below 60% on day 28 did not imply a lack of biodegradability.** Hence we propose the criteria accept ECHA’s definition of enhanced readily (page 213 of ECHA Link: https://echa.europa.eu/documents/10162/13632/information_requirements_r7b_en.pdf/1a551efc-bd6a-4d1f-b719-16e0d3a01919) . We believe that the end goal is to prove lack of persistence of the material driven by rapid and complete biodegradation which is indeed demonstrated by the enhanced readily biodegradable criteria as equivocally as by the readily criteria.

Procter & Gamble

PVA film in dishwashing detergents have been designed to be solubilised in wash and to not accumulate in the environment. They are biodegradable and laboratory tests demonstrate degradation by 60% well within 60 days, meeting the criteria for ECHA’s Enhanced Ready Biodegradability. They do not pose a concern to the environment as reflected in the upcoming microplastic regulations which excludes PVA film from the scope of restrictions. Therefore, we suggest changing the criteria proposal to accept the ECHA’s definition of Enhanced Ready Biodegradability. (page 213 of ECHA Link: https://echa.europa.eu/documents/10162/13632/information_requirements_r7b_en.pdf/1a551efc-bd6a-4d1f-b719-16e0d3a01919)

Comments from Nordic Ecolabelling

Thank you for your comment. Nordic Ecolabelling has reviewed the enhanced biodegradation screening test performed as a modification of OECD 301B (or OECD 301F) along with an independent third-party. We find that the enhanced test guideline with longer incubation and continued biodegradation measurements up to 60 days would be suitable for testing the aerobic biodegradability of water-soluble films. The requirement will be revised based on your input.

Reckitt Benckiser

Testing on the total composition is fine, but the acceptance of cross-reads should be allowed if scientifically justified eg. Minor variation not expected to impact biodegradability. The requirement of testing on the actual film should be removed as in practicality it would be near-impossible to conduct test on each and every variant within relevant timings and resource demands very high.

Comments from Nordic Ecolabelling

Thank you for your comment. Nordic Ecolabelling, together with an independent third party, has investigated how we can set up a framework for biodegradability prediction. The requirement will be revised based on your input.

Svenskt Vatten

Bra att det nu finns ett krav på att PVA-film ska vara biologiskt nedbrytbar.

Nordisk Miljömärknings kommentar

Takk for støtten.

O15 Anaerobic biodegradability

No comments

4.3.4 Section 4, Performance

O16 Performance of the dishwasher detergent

KiiltoClean

Comment on criteria: *Reference detergent IEC-D must be used with a dose of 20 g. Test detergent must be dosed according to the recommended dosage at 6°dH. Rinse aid formula III (IEC 60436), 3 ml, may be used with classic products and with the reference.*

Why reference has higher dosage than test product? Set maximum dosage for test product is 18 g/wash. That makes the comparison unfair and unscientific because the efficacies are not compared with equal dosage.

Comments from Nordic Ecolabelling

Thank you for your input. 20 g of IEC-D versus test product dosage as recommended by the manufacturer is in accordance with the recommendations in the IKW2015. Nordic Ecolabelling considers, in accordance with IKW 2015, that testing each product at its recommended dosage is most appropriate.

McBride

Requirement on test temperature for reference product IEC-D is missing. If reference has to be washed at 50 °C, the requirement of 45 °C for products is a problem for our "middle range" formulations. If reference detergent has to be washed at 45 °C the requirement of 45 °C for products is ok.

The change in requirement from "the product is considered as good as the reference if average value of all 8 soil types is better than the reference to

If 7 soils are tested: The dishwasher detergent must perform as good as or better than the reference detergent IEC-D in all soil classes, meaning that the results for the average (arithmetic mean) of soils types within each soil class must be at least as good as or better than the reference detergent.

This is a big issues, as none of our products will be approved because reference products are very good on tea (at 50 °C, we do not know at 45°C).

The reference product contains high amount of silicate, which is delivering a good tea performance. But high content of silicate is also resulting in a more severe product hazard classification.

Orkla Home & Personal Care

Siden vannhardheten er så ulike i nordiske land, er kanskje det viktigste at vannhardhet og temperatur er likt på testproduktet og referansen, i stedet for å sette en satt verdi vannhardhet eller temperatur da dette varierer mellom landene.

Kommentarer fra underleverandører:

Krav om test-temperatur for referanseproduktet IEC-D mangler.

Det er et bytte i kravet fra «the product is considered as good as the reference if average value of all 8 soil types is better than the reference» til “If 7 soils are tested: The dishwasher detergent must perform as good as or better than the reference detergent IEC-D in all soil classes, meaning that the results for the average (arithmetic mean) of soils types within each soil class must be at least as good as or better than the reference detergent”.

Dette er et problem for noen av produktetene til vår leverandør, som er effektivt mot te på 50°C, men med ukjent effektivitet på 45°C.

Referanseproduktet inneholder en høy mengde silikat, som gir god effekt mot te-flekker. Men et høyt nivå av silikat gir også klassifiseringene H318 og H315, som ikke er ønskelig i produktet.

Comments from Nordic Ecolabelling

Thank you for your input. The test temperature is 45°C for both the test product and reference product. We consider the change to comparison within soil classes as more relevant, as it should be expected that a dishwasher detergent is efficient on the commonly encountered soil classes. Regarding your comment about the reference detergent IEC-D: We had added the following alternative to fulfill the requirement. “Alternatively, the overall mean for all soil types must be 20% higher than that of the reference.”

Nopa Nordic

Vi vil gerne understrege vigtigheden af at der testes ved 45°C både på produkt og reference.

Valget af 6°dH vil ikke være dækkende for den vandhårdhed danske forbrugere har, her vil 15°dH være bedre. Test på produkt og reference bør så være ens.

Flydende maskinopvask: en større international koncern har patent på det blegesystem der kan bruges til flydende maskinopvask. Det betyder vores maskinopvask gel ikke kan bestå den eneste soil på blegemiddel - the. Det vil derfor være nødvendigt med en ændring i referencemidlet eller bedømmelsen af testen. Referencemidlet kunne være uden blegesystem som det er tilladt på Tekstilvask kriteriet for flydende vaskemidler, eller man kan se på ændring i kravet til at bestå på alle 4 soil-typer.

VKH – Dansk Industri

O16 Effektivitet af opvaskemidler (O22 i generation 6). Testmetode opdateret til IKW2015 (inkl. en lavere testtemperatur på 45°C) samt modificeret til specifikke svanemærkekrav.

Vi ønsker at understrege vigtigheden af, at der testes ved 45°C både på produkt og reference. Valget af 6°dH vil ikke være dækkende for den vandhårdhed danske forbrugere har - 15° dH vil være mere realistisk. Test på produkt og reference bør være ens.

I forhold til flydende maskinopvask kan det oplyses, at en større international koncern har patent på det blegesystem der kan bruges til flydende maskinopvask. Det vil derfor være nødvendigt med en ændring i referencemidlet eller bedømmelsen af testen for at vi kan leve op til det. Referencemidlet kunne være uden blegesystem som det er tilladt på Tekstilvask kriteriet for flydende vaskemidler, eller man kan se på ændring i kravet til at bestå på alle 4 soil-typer.

Nordisk Miljömärknings kommentar

Takk for deres innspill. Både produkt og referanse skal testes ved 45°C. Vi vil tillate at testproduktet kjøres ved høyere vannhardhet enn 6°dH. Høyere vannhardhet impliserer tøffere vaskebetingelser. Vi vil definere betingelser med hensyn til testing ved høyere vannhardhet i kriteriene.

Når det gjelder flytende maskinopvaskmiddel, så må en forbruker kunne forvente at produktet er effektivt på alle smussklasser. Nordisk Miljømerking tar ikke stilling til hvilket produktformat (flytende, kapsel, pulver, tablett etc.) eller hvilken kjemi som benyttes for å oppnå tilfredsstillende funksjonalitet, såfremt det tilfredsstillende våre krav.

Unilever

O16: The draft criteria on Dishwasher detergents require that “other claims” concerning the products performance (e.g. short cycles, lower temperatures, specific stains) must also be tested and proved with Nordic Swan. Unilever views this requirement as unnecessary and recommends that this requirement is removed. We can understand that Nordic Swan sets a performance standard to ensure that the products have a suitable cleaning within the technical constraints it has set however, further submission on claims which are outside the basic cleaning scope further places unnecessary burdens on producers. Unilever views substantiation of other performance relevant claims and how the claims are supported as competitively sensitive material and shares, when necessary when challenged by competitors. Furthermore, the requirement will further cripple flexibility in executing new marketing activities with speed.

Comments from Nordic Ecolabelling

Thank you for your input. Nordic Ecolabelling treats all documentation as confidential information. The requirement for claim support also exists in the current generation of the criteria. The revised criteria will be made available in our new, digital application portal. We hope that the digitalization will make the application process smoother and more flexible than today, and that the submission of claim support to Nordic Ecolabelling will not lead to delays in rapid marketing activities.

Reckitt Benckiser

- **Why is the performance testing not consumer relevant?**
 - It should be allowed to use Ecocycles instead of P2 cycles as most consumer autodishwashing machines are set to eco-cycles by default.
 - Furthermore it would be interesting for Nordic Swan to get an understanding of what cycles do consumers use? 20min washing cycles is not commonly used. Are P2 washing cycles water consumption reflective of consumer households?
- In-market Reference detergent should also be allowed as IEC-D is not relevant eg. 10% silicate

Comments from Nordic Ecolabelling

Thank you for your input. Testing on eco-program instead of the short cycle as specified in IKW2015 might result in less differentiation between the tested products. Differentiation, as achieved by short cycles and low temperature, is essential when comparing products and looking for strengths, weaknesses and differences.

Nordic Ecolabelling have discovered that the performance of machine dishwashing detergents on the market is fluctuating, due to an increase in raw material costs. As we want the reference detergent to be a more fixed benchmark, only testing against IEC-D is allowed.

O17 Performance of the rinse aid

McBride

We do not know this test in details, so do not know if all products will pass this requirement.

A lot of our products for Scandinavia are developed for soft water and not for 18 °dH. The demand of testing at 18 °dH water hardness is critical for these products.

Requirement on water hardness for test of reference product is missing.

Requirement regarding the commercial ion exchanger must be disabled does only make sense, when testing at higher water hardness than tap water for the area, where the lab is located.

If we are not able to fulfil this requirement, we would not be able to make multifunctional dishwasher products.

Comments from Nordic Ecolabelling

Thank you for your input. The water hardness for the reference shall be the same as for the test product. We will add this information to the test framework. We will also clarify that the hard water hardness of 18 °dH is only required for multifunctional products that are marketed as having a salt function.

Nopa Nordic

Ang. Test på rinse aid. Valg af 18°dH afviger fra de vandhårdheder vil ellers tester ved og vi foreslår 15°dH i stedet.

VKH – Dansk Industri

O17 Effektivitet af afspændingsmidler. Ny testmetode – vær opmærksom på, at multifunktionelle produkter med afspændingsmiddelfunktion skal opfylde dette krav.

Ang. Test på rinse aid. Valg af 18°dH afviger fra de vandhårdheder vi ellers tester ved og det foreslår 15°dH i stedet.

Nordisk Miljömärknings kommentar

Takk for deres innspill. Det er nødvendig å teste produktet under mer krevende vaskeforhold i form av hardere vann enn det bløte vann som er normalt i Norden, for å få en indikasjon på produktets effektivitet i løpet av bare noen få vaskesykluser.

Forskjellen mellom 15°dH og 18°dH er relativt liten. Men gitt at to ledende testinstutter normalt tester ved henholdsvis 21°dH og 19,6°dH, og forskjellen mellom 21°dH og 15°dH begynner å bli relativt stor, mener vi at det er hensiktsmessig å opprettholde grensen på minimum 18°dH.

Procter & Gamble

We propose to test rinse aid efficacy in a multifunctional product (ADW detergent + rinse aid) against a reference ADW detergent only.

Comments from Nordic Ecolabelling

Thank you for your input. However, we do find it reasonable to expect that a rinse aid function in a multifunctional product should be tested against a “real” rinse aid, in order to substantiate that the multifunctional product delivers rinse aid function of satisfactory quality. Hence, we will maintain the requirement.

4.3.5 Section 5, Packaging

IVAR IKS

Jeg skriver bare noen ord om temaet recyclability av emballasjen for maskinoppvask- og glansmidler. Det er der jeg kan bidra med noe.

Jeg representerer her IVAR IKS som driver et automatisk sorteringsanlegg for restavfall fra husholdninger (der vi tar ut 5 ulike sorter med plast, 2 sorter metaller samt en blanding av papir/papp/kartong/drikkekartong).

Vi har dessuten et sorteringsanlegg for blandet papir, der vi tar ut sortene de-ink (aviser/magasiner), OCC (bølgepapp), drikkekartonger («TetraPak») og mixed paper (blanding av først og fremst småkartonger samt en del lesestoff og papp).

Vi bruker såkalt NIR-teknologi til å gjenkjenne og sortere ulike materialer fra hverandre.

Vedlagte fire minutters film gir en god introduksjon til automatisk sortering slik vi gjøre det på IVAR. Se <https://vimeo.com/379962215/6544bae9bf>

Dette er en teknisk løsning som innen ti år vil være rådende for nesten all håndtering av restavfall i hele Norden, det er jeg overbevist om.

«Recyclability» er for oss i første rekke sorterbarhet. Klarer man å skille de ulike avfallsgjenstandene etter rene, ensartede materialer, er minst halve jobben gjort. Resirkuleringsbedriftene vil ha rene varer (materialer), ikke blandinger.

- Det vil si at ett emballasjeprodukt (f.eks. en beholder for oppvaskmiddel) i sin helhet helst bør bestå av kun ett materiale. Monomateriale bør få en høy score i vurderingen hos Miljømerking Norge.

- Dersom det brukes flere ulike materialer på beholderen, bør disse materialene ikke være limt sammen, men derimot falle lett fra hverandre ved mekanisk påvirkning (kverning, risting, riving). Ligger de ulike materialene hver for seg på samlebandet, er disse lett å sortere fra hverandre ved hjelp av NIR-maskiner.
- Alle former for sammenlimte produkter, det være seg blandinger av ulike plasttyper eller blandinger av plast med papirfibre eller aluminium, er problematiske i sorterings- og resirkuleringssammenheng. Våre NIR-maskiner kan også sortere sammensatte produkter ved å detektere hovedkomponenten i produktet og sortere deretter. Men det vil da alltid følge «fremmede» komponenter med inn i denne materialstrømmen. Og for resirkuleringsbedriften vil bare hovedkomponenten være interessant, mens alt annet blir regnet som avfall. En plastbelagt kartong for oppvaskmiddel vil gjerne bli sortert ut som kartong, men i papirfakbrikken blir plastbelegget ansett som uønsket materiale som må renskes bort og brennes.

Farge spiller vanligvis ikke noen rolle for sorterbarheten av materialer. Unntaket er helsvarte produkter, med mye bruk av carbon black. De lar seg vanligvis ikke detektere fordi de ikke stråler noe lys tilbake.

Papir/papp/kartong-produkter bør helst ikke være gjennomfarget (slik mange eggekartonger er). Slike produkter setter mye farge på alt annet papir som ligger i pulperen og er derfor lite populære i papirfabrikkene. Vi prøver så godt vi kan å sortere vekk gjennomfarget papir fra våre papirsortimenter.

Når det gjelder farget plast, er klar (helt gjennomsiktig) plast lettest å gjenvinne. Jo lysere fargen er, dess enklere er gjenvinnbarheten. Blant fargede ting er hvit best. Ved PET som materiale kan det dog være allerede vanskelig nok å bli kvitt transparent-kolorert PET. Resirkuleringsbedriftene vil helst ha klare flasker, intet annet. Opake PET-flasker er helt fy. Samtidig er det dog bestrebelser på gang i Norden å få etablert kjemisk gjenvinning av PET, og da spiller farge ikke noen rolle lenger. Her kan mao. situasjonen og oppfatningene endre seg i framtiden.

Pouches er et kapittel for seg. De senere år har stand-up pouches fått en større og større markedsandel i handelen med matvarer og hygieneprodukter. Vi som resirkulerere ser ikke med glade øyne på dette. Pouches kan bestå av flere plasttyper pluss papirfibre pluss aluminium, og alt er limt tett sammen. Pr. i dag finnes det ikke noen tilfredsstillende løsninger som klarer å materialgjenvinne alle komponenter i pouches. Pouches havner hos oss stort sett i en forbrenningsfraksjon (som ikke-resirkulerbar plast), og noen av dem havner i vår aluminium-fraksjon – men da som en forurensning fordi aluminium-andelen i en pouch er minimal sammenlignet med plast- og papir-andelene i den.

Jeg vet at pouches har miljømessige fordeler i produktets produksjons- og bruksfase. Men jeg vil gå så langt å si at så lenge det ikke er bevist at minst 80% av materialinnholdet faktisk kan gjenvinnes (og da med betoning av ordet «faktisk»), bør pouches ikke være tillatt brukt i markedet i det hele tatt. Mangel på dokumentert recyclability bør trekke dette produktet i det minste veldig langt ned på en miljøskala.

Nordisk Miljömärknings kommentar

Takk for deres innspill. Vi mener at vår tilnærming i stor grad er i tråd med deres innspill. Dog vil flere av kravene våre være et kompromiss mellom det resirkuleringsmessig optimale på den ene siden og dagens markedssituasjon samt tekniske emballasjekrav for å beskytte produktene på den andre siden. (F.eks. tillater vi plastbelegg på pappemballasje, fordi det fungerer som fuktbarriere, men vi begrenser plastbelegget til en-sidig laminat). Vi vil legge til forbud mot gjennomfarget kartong, slik dere foreslår.

Svensk Dagligvaruhandel

Vi instämmer i att mer återvunnet material behöver användas i förpackningar för att vara resurseffektivt och möjliggöra en cirkulär ekonomi. Tillgången på återvunnet material varierar dock och för vissa material råder det brist. Vi vill därför uppmärksamma att ett fast krav på minsta andel återvunnen råvara kan vara svårt att uppnå.

Nordisk Miljömärknings kommentar

Takk for deres innspill. Vi kjenner til at tilgjengelighet kan være en utfordring. Vi tilstreber dog å stille absolutte krav i våre kriterier, i henhold til ISO 14024. Vi tilstreber å sette grensen på et nivå som er ambisiøst men oppnåelig.

O18 Recycling of all packaging

McBride

O18 Recycling of soft plastic is not handled in all area of Scandinavia. This would cause a problem for our PP foil and doypacks.

Comments from Nordic Ecolabelling

Thank you for your comment. "Standard" doypacks that fulfil the specific requirements for "Flexible plastic pouches: Recycled material and Design for recycling" (as well as the other relevant requirements) will still be permitted. Likewise, PP foil will be permitted according to the same requirements.

Diversey

Recycling in the Nordic countries: could you develop more? For example with links to references or guidelines or Nordic Producer Responsibility organisations. This would facilitate compliance, particularly for applicants outside of the Nordics.

Comments from Nordic Ecolabelling

Thank you for your comment. Because of the administrative burden connected with providing and maintaining relevant links to the different producer responsibility organizations, we would rather recommend you to contact the organization that you belong to directly.

O19 Rigid plastic packaging: Recycled material and Design for recycling

Miljøministeriet

MST Cirkulær Økonomi og Affald: Det skal bemærkes, at kravet om anvendelse af genanvendt plast kan risikere at medføre at genanvendt fødevarekontaktmateriale nedgraderes til brug for emballage til rengøringsmidler, hvorved plasten ikke kan fødes tilbage til fødevarekontaktmaterialestrømmen igen. Det anbefales derfor at indsætte en hensigtserklæring om, at der skal anvendes genanvendt plastmateriale, som ikke stammer fra fødevarekontaktmaterialestrømmen, såfremt dette er muligt.

Nordisk Miljömärknings kommentar

Takk for deres innspill. Vi vil presisere i vårt bakgrunnsdokument at vi anmoder om at det ikke brukes PCR som er beregnet for næringsmidler, så der ikke sker en unødig degradering af materialestrømmen. Vi vil dog ikke innsette den foreslåtte hensiktserklæring, fordi vi tilstreber å stille «absolutte krav» i henhold til ISO 14024.

SPIF

Sid 18 pkt O19

“Barriers are not allowed in plastic packaging.”

Barriærer av typ Al_2O_3 og SiO_2 är oftast mycket tunna lager och har ingen nämnvärd negativ inverkan på materialåtervinning.

Sid 18 pkt O19

“The individual components of the container and closure must be made from either PE (polyethylene), PP (polypropylene) or PET (polyethylene terephthalate).”

I de fall det är olika material i korkar kan korkens vikt av totala förpackningen ha en negativ inverkan vid materialåtervinning. T ex:

- En PP-kork som utgör > 2 % av en PE-förpacknings vikt kan ge gel-effekter i den materialåtervunna PE-fraksjonen. Omvänt gäller > 5 % PE i en PP-fraksjonen.

PE och PP stannar båda i samma fraksjon i det efterföljande tvättsteget.

- PE- eller PP-korkar på en PET-förpackning utgör däremot inget problem (separeras i efterföljande tvättsteg).

Nordisk Miljömärknings kommentar

Takk for deres innspill. Barrierer av Al_2O_3 og SiO_2 er ikke lenger er listet under «full compatibility» i Recyclclass' guidelines for PE og PP hardplast². Dessuten har vi ikke fått noen spesifikke forespørsel om å godta barrierematerialer for hardplastemballasje innenfor maskinoppvaskmidler. Derfor vil vi opprettholde forbudet mot barrierer.

Angående korker av PP på PE-emballasje: Innenfor håndoppvaskmidler³ har vi følgende krav (O14): PE: PP/OPP-førslutningar tillåts inte på förpackningar förutom i de fall då följande text (eller likvärdig) finns på förpackningen: Skruva av kapsylen innan återvinning av förpackningen för att underlätta återvinningen. Kravene for tekstilvaskemidler⁴ ble revidert etter håndoppvaskmidler, i 2019. Vi fikk den gangen tilbakemeldinger fra interessenter om at sorteringsanleggene i Norden hadde ulike ønsker med hensyn til om korken skal skrues av eller beholdes på. Vi besluttet derfor å fjerne kravet om at kapselen skal skrues av, og isteden adressere denne problematikken ved at produsentene må vurdere dette i det aktuelle markedet, i henhold til krav O19. Vi vil velge samme tilnærming for maskinoppvaskmidler og glansemidler som for tekstilvaskemidler. Informasjon om gjenvinning adresseres i krav O28.

² <https://recyclclass.eu/recyclclass/design-for-recycling-guidelines/> (lesedato 2021-05-26)

³ <https://api.nordicecolabel.org/api/docs/CriteriaDocuments?productGroupNumber=25> (lesedato 2021-05-26)

⁴

<https://api.nordicecolabel.org/api/docs/CriteriaDocuments?productGroupNumber=006&language=s> (lesedato 2021-05-26)

O20 Flexible plastic pouches: Recycled material and Design for recycling

KiiltoClean

Opposed criteria: 1. *Recycled material*

The container part of flexible plastic pouches must contain a minimum 25% post-consumer/commercial recycled material (PCR). The percentage is calculated by mass on the container part, exclusive closure and label.*

We feel that this requirement is too demanding. It is already challenging to find a pouch with monomaterial. We are afraid that PCR containing pouches are not available or their quality is not adequate.

We suggest that the requirement of 25 % PCR is removed.

Kosmetik- og hygiejnebranchen

Vi mener, at det er for stort et skridt til at kræve 25% genbrugsmateriale i fleksibel plastemballage. Kravet kan ikke opnås i den nuværende situation.

I kriterierne for tekstilvaskemidler, der blev vedtaget for ca. 1 år siden, blev det ikke anset for muligt at indføre 25% genbrugsmateriale i plastemballage. I baggrundsdokumentet til vaskemiddelkriterierne (januar 2021) skrev Svanemærket: ”Der er ikke krav om fleksible plastposer / poser og papemballage til flydende produkter, der indeholder PCR-materiale. For plastposer / poser er kravet om monomateriale (O21) i øjeblikket en udfordring selv med jomfrueligt materiale.”

Denne holdning gælder stadig for fleksibel plastemballage til opvaskemiddel. Vi vurderer også, at der ikke er tilstrækkelig mængde genanvendt plastmateriale på markedet til at kunne opfylde de foreslåede krav.

Kosmetik- og hygiejnebranchen mener, at kravene til fleksibel plastemballage er strengere end for andre typer emballager, hvilket er uheldigt, da de sparer både volumen og emballagemateriale. Vi ønsker, at kravet omformuleres, så licenstagere kan have mulighed for at vælge punkt 1 eller punkt 2 for at opfylde kravet i O20.

Kosmetik- och Hygienföretagen, KoHF

Vi bedömer att det är ett för stort steg att kräva 25 % återvunnet material i flexibla plastemballage. Kravet kommer inte att vara möjligt att uppnå i dagens läge. I kriterierna för textiltvättmedel som antogs för ca 1 år sedan ansåg man inte att det var möjligt att införa 25 % återvunnet material i plastemballagen. I bakgrundsdokumentet till tvättmedelskriterierna (januari 2021) skrev Nordiska Svanen: ”Det finns inga krav på att flexibla plastpåsar/pouches och kartongförpackningar för flytande produkter ska innehålla PCR material. För plastpåsar/pouches är kravet på monomaterial (O21) för närvarande en utmaning även med jungfruligt material.” Detta ställningstagande gäller än och även för flexibla plastemballage till maskindiskmedel. Vi bedömer också att det inte finns tillräcklig mängd återvunnet plastmaterial på marknaden för att kunna uppfylla de föreslagna kraven. KoHF uppfattar att kraven på flexibla plastemballage är hårdare än på andra typer av emballage vilket är olyckligt då de både spar volym och förpackningsmaterial. Vi skulle vilja att kravet formuleras om så att licensinnehavaren kan ha alternativet att välja punkt 1 eller punkt 2 för att uppfylla kravet i O20.

Orkla Home & Personal Care

Kommentarer fra underleverandører:

Det er ikke mulig å lage fleksible poser i resirkulert materiale, da materialet ikke er tilgjengelig. Det er OK med monomaterialer til fleksible poser, så lenge det ikke inneholder resirkulert.

Nopa Nordic

Det er ikke mulig å lage fleksible poser i genbrug grundet at materialet ikke er tilgjengelig, i dag er det meget lidt forbruger folier som bliver genanvendt på markedet og dermed lav mængde tilgængelig. Markedet har haft fokus på i første omgang at få produkter over i mono-materiale for på sigt at gøre det muligt at tilbyde PCR i folieposer. Det er OK med mono materialer til fleksible poser så længe det ikke skal indeholde genbrug.

Procter & Gamble

There are technical challenges using post-consumer/commercial recycled material (PCR) material in flexible plastic packaging. Overcoming such challenges, and thus introducing PCR in recyclable flexible plastic packaging, requires long-term efforts for technological innovation. Therefore, we suggest to either produce recyclable mono-material packaging made of virgin plastic, OR produce non-recyclable packaging containing post-industrial recycled (PIR) material.

VKH – Dansk Industri

O20: Fleksible plastposer: Recirkulerbart materiale og design for genanvendelse

Det skal bemærkes, at det ikke er muligt at lave fleksible poser i genbrug grundet at materialet ikke er tilgjengelig. Det er muligt med mono materialer til fleksible poser, så længe det ikke skal indeholde genbrug

Reckitt Benckiser

The container part of flexible plastic pouches must contain a minimum 25% postconsumer/

commercial recycled material (PCR)*. The percentage is calculated by mass on the container part, exclusive closure and label.

- Last year During laundry criteria development pouches were not in scope of mandatory PCR in packaging. From our view the landscape has not changed enough that this is a requirement that can be fulfilled.

Comments from Nordic Ecolabelling

Thank you for your comments. We will remove the requirement of 25% PCR.

SPIF

Sid 18 pkt O20

En allmän kommentar rörande förpackningar av ”filmtyp”, vilket en stå-upp-påse i princip är. PP-filmer materialåtervinnas inte idag i någon större omfattning eftersom det inte finns någon eftermarknad för denna utsorterade fraktion. Detsamma gäller även för PET-filmer. Notera även att PET-filmer oftast är av laminattyp med en PE-sida för att underlätta svetsning.

Nordisk Miljömärknings kommentar

Takk for deres innspill. Fleksible plastposer er et mye brukt emballasjeformat innenfor maskinoppvaskmidler. Vi har valgt å tillate både PP, PE og PET-filmer og

samtidig kreve monomaterial, for å forsøke å drive markedet over fra laminater av ulike plasttyper (f.eks. PET-filmer med en PE-side, som dere nevner), og over mot gjenvinnbare filmer.

O21 Labels for rigid plastic packaging and flexible plastic pouches: Design for recycling⁵.

KiiltoClean

Opposed criteria: *Containers in polyethene (PE) and polypropylene (PP), must have a label with the same plastic material as the packaging (i.e. PE-label on PE packaging and PP-label on PP packaging).*

We are very concerned about the fact that this part of the criteria is limiting new label material development. There are new label materials that reduce the environmental impact of plastic. Especially interesting is the development by Woody. Woody is bringing to the market a new label material, so called wood-based plastic, which is based on cellulose, renewable certified raw material. This material is reducing dependence on fossil-based materials and thus boosting circular economy.

We think that Nordic Swan criteria should not limit the use of new advanced label materials. In order to allow the positive development, we ask The Nordic Swan Ecolabel to consider and take into account the following with regard to the criteria for label materials:

- allow the use of labels for PE and PP packaging made of such materials that reduce environmental impact compared to traditional label materials, PE and PP
- apply the same criteria for PE and PP packaging labels that is proposed for PET containers with different label materials, i.e. labels must not cover more than 60 % of the container

We suggest:

Containers in polyethene (PE) and polypropylene (PP), must have a label with the same plastic material as the packaging (i.e. PE-label on PE packaging and PP-label on PP packaging).

- **Exemption: Other label materials can be accepted if the new material has less environmental impact than PE or PP label material. The proof of having less environmental impact must be based on life cycle assessment or similar.**

⁵ Note: The proposed label requirements in O21 were based on the findings in a label project run by Nordic Ecolabelling in the summer/autumn of 2020 for laundry detergents, cleaning products and hand dishwashing detergents. Hence, licensees within these product groups, as well as licensees within car, boat and train care products, were invited to comment specifically on O21, in the context of their respective product group. The comments that are specific to these product groups and that do not target dishwasher detergents and rinse aids directly, are included in appendix 1.

Opposed criteria: For labels of different material than the packaging (PET containers): Labels must not cover more than 60% of the container. 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 pack are of different size, the maximum percentage of 60% shall be fulfilled for each side separately. For a cylindrical bottle, the calculation can also be based on the three-dimensional profile exclusive bottom and top of the bottle.

Canisters that are used typically in B2B packaging, have a remarkable surface area in the side of the packaging. The canisters can be from 3 L up to 20 L or even more. Canisters have big surface area to enable correct detection in NIR sorting technology. That is why we suggest that all 4 sides and the bottom of the canister are calculated to the total surface area of the packaging.

We suggest:

For labels of different material than the packaging: Labels must not cover more than 60% of the container. 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 pack are of different size, the maximum percentage of 60% shall be fulfilled for each side separately. For a cylindrical bottle, the calculation can also be based on the three-dimensional profile exclusive bottom and top of the bottle. **For canisters (> 2 L) the calculation can also be based on the three-dimensional profile including bottom, but excluding top of the canister.**

Comments from Nordic Ecolabelling

Thank you for your input. The label requirement will be updated, and i.a. some different label materials will be accepted on PE and PP packaging, combined with the maximum coverage area of 60%. The packaging and label criteria are formulated with basis on packaging that can be currently recycled in the existing material recycling systems in the Nordic countries. However, it is not our intention to slow down positive developments. Hence, we have written in the criteria that "If you are interested in another packaging type, please contact Nordic Ecolabelling to find out whether the criteria can be extended to include your format." This also applies for labels. Bigger canisters are in general not relevant for dishwasher detergents and rinse aids for consumers. For a comment on bigger canisters, please see Appendix 1.

Woodly Oy

Referring to the proposed criterion O21 on label requirements for hand dishwashing detergents, cleaning products, laundry detergents and car, boat and train care products, and dishwasher detergents and rinse aids, we would like to highlight some aspects concerning criteria of packaging labels for rigid plastic packaging and flexible plastic pouches for the product categories mentioned above.

As a result of innovations and continuous research and development efforts on label materials, new alternatives are emerging alongside traditional existing ones that stimulate resource efficiency and circular economy. As an example Woodly is

bringing to the market a new label material so called Woodly plastic which is cellulose-based renewable and certified material. By providing an alternative to fossil-based label materials Woodly as a company aims to support its Nordic Swan Ecolabel licenced clients in their efforts on to ensure the recyclability of packages, and further to enhance circularity. Therefore, we see that the Nordic Swan Ecolabel should allow the use of cellulose-based plastic materials in labels.

In order to allow, support and promote the use of advanced non-fossil cellulose-based label materials, we ask the Nordic Swan Ecolabel to consider and take into account the following with regard to the criteria for label materials (referring to O21):

- allow the use of labels made of different plastic materials (e.g. cellulose-based plastic materials) on the labels for all packagings, i.e. for polyethylene (PE), polypropylene (PP) and polyethylene terephthalate (PET) packagings,
- apply the same criteria for cover of labels for PE and PP containers that is proposed for PET containers with different label materials, i.e. labels must not cover more than 60 % of the container and applying the same calculation rules as for the labels in PET packaging;

Opposed criteria: Containers in polyethene (PE) and polypropylene (PP), must have a label label with the same plastic material as the packaging (i.e. PE-label on PE packaging and PP- label on PP packaging).

Reasonings: In the proposed criteria it is stated that PE and PP packaging must have a label with the same plastic material as the packaging, whereas later in the criteria the use of other plastic materials on the label for polyethylene terephthalate (PET) packaging is allowed. The similar requirement should apply to polyethene (PE) and polypropylene (PP) containers as for PET containers so that innovations and development efforts of advanced non-fossil label materials, which have a positive environmental impact, and their use in the future is not restricted or excluded. As proposed for the cover in the criteria the similar requiremens shall apply respectively, i.e. the labels must not cover more than 60% of the container, and calculation methods of label size as descibed.

Proposed new wording: Containers in polyethene (PE) and polypropylene (PP), must have a label with the same plastic material as the packaging (i.e. PE-label on PE packaging and PP- label on PP packaging). With an exemption containers of polyethylene (PE), polypropylene (PP) and polyethylene terephthalate (PET) can have a label with the different plastic material than the packaging, if label is cellulose-based material and if the label material has less environmental impact than PE or PP label material. The proof of having less environmental impact must be based on life cycle assessment or similar. For labels of different material than the packaging: Labels must not cover more than 60% of the container. 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 pack are of different size, the maximum percentage of 60% shall be fulfilled for each side separately. For a cylindrical bottle, the calculation can also be based on the three- dimensional profile exclusive bottom and top of the bottle.

Comments from Nordic Ecolabelling

Thank you for your input. Please see the answer to KiiltoClean, above.

Kosmetik- og hygiejnebranchen

Mange produkter bruger flere og flere krympefilm etiketter, som skal behandles i kriterierne. Vi mener, at disse bør tillades, hvis det tydeligt fremgår, at krympefilmen skal adskilles fra emballagen inden genbrug, det skal være muligt at

godkende en krympefilm. Fordelen ved at bruge krympefilmetiketter er, at du derefter kan øge mængden af genbrugsmateriale i emballagen. Branchen har for nylig introduceret et nyt logo for at vise, at du skal adskille dækslet fra emballagen inden genbrug, se nedenfor. Dette logo introduceres løbende på markedet fra nu af. Logoet oversættes også til de nationale sprog i EU.



Kosmetik- og Hygienföretagen, KoHF

Många produkter använder mer och mer krympfilmsetiketter, vilket bör hanteras i kriterierna. Vi anser att dessa bör tillåtas om man tydligt anger att krympfilmen ska separeras från förpackningen före återvinning bör en krympfilm kunna godkännas. Fördelen med att använda krympfilmsetiketter är att man då kan öka mängden återvunnet material i förpackningen. Branschen har nyligen introducerat en ny logo för att visa att man ska separera höljet från förpackningen före återvinning, se nedan. Denna logo kommer att introduceras löpande på marknaden från och med nu. Logon finns även översatt till de nationella språken inom EU.

Vi har även insett att vi har missat en kommentar gällande O21. Nu kan jag inte hitta remissdokumenten på er hemsida längre, men det handlar om att pigment inte tillåts på flexibla plastförpackningar. Detta är mycket olyckligt då det innebär att etiketter måste klistras på med både extra plastförbrukning och extra lim som konsekvens. Här är det viktigt att ni hör med företagen om vad som är möjligt.

Nordisk Miljömärknings kommentar

Takk for deres innspill. Vi vil ikke akseptere krympfilmetiketter som må separeres manuelt av forbruker. Det ville kreve en vesentlig endring av forbrukeradferden, som vi ikke tror er realistisk. Dermed anser vi ikke dette som en optimal design innenfor design for gjenvinning. Merk dog at begrensningen om maks 60% arealdekning kun gjelder dersom etikett og beholder er av ulikt materiale. I den sammenheng er det også verd å bemerke at vi vil tillate cPET etiketter på PET-flasker, dersom dette blir godkjent av EPBP (The European PET Bottle Platform) og/eller RecyClass.

Vi vil fjerne det foreslåtte forbudet mot direkte trykk på fleksible plastposer.

Nopa Nordic

Det vil ikke være muligt at lave en PE etiket med en PE laminat grundet at laminater i dag er fremstillet af OPP. Et af argumenterne for at bruge laminater på etiketter i dag er at de øger stivheden af etiketten hvilket giver en bedre etiket påsætning, hvis vi skal undgå brugen af OPP laminat så vil alternativet være at vi skal gå op i meget høje gramvægte, det anser vi for at være det forkerte vej at gå på grund af et overforbrug af materialer og at vi i dag har en løsning hvor PE og OPP er forenelige materialer i genanvendelsen. Derudover vil vi gerne have muligheden for at bruge PP etiketter (med laminat) på PE flasker da det kun er muligt at lave en transparent etiket ud af PP.

Derudover er vi bekymret for at hvis det ikke bliver tilladt at bruge papir etiketter (med laminat) på svanemærkede produkter vil en del af "low budget" produkterne blive tvunget til at gå væk fra svanemærket. Grunden til dette er at plast etiketter er over 100% dyrere end papir etiketter. Dette kombineret med at de bliver tvunget over i genbrugs emballager (hvilket også giver en prisstigning) kan presse "low budget" produkterne væk fra at bruge svanemærket.

Til PET flasker vil vi gerne have muligheden for at kunne tilbyde sleeve på disse. En del af de ADW produkter som er på markedet i dag har sleeve på. Vi bruger udelukkende PET baseret sleeve (har samme kemiske egenskaber som den PET der bliver brugt til flasker) hvilket øger muligheden for at genanvende emballagen. Derudover producerer vi kun sleeve produkter med perforering og vejledning for adskillelse for at øge genanvendelses mulighederne af emballagen. Det er krav fra vores side at kunderne skal have dette.

Ifht størrelsen af etiketten på en PET flaske kan det være en udfordring at gå med maks 60% når der også sættes krav om forbruger information på etiketterne (O26+O27). En stor del af de emballager som bruges indenfor disse produktkategorier er i dag fremstillet af PET.

Nordisk Miljömärknings kommentar

Takk for deres innspill. Etikettkravet vil bli oppdatert, bl.a. vil noen ulike etikettmaterialer godkjennes på PE og PP emballasje.

Vi vil ikke akseptere krympfilmetiketter som må separeres manuelt av forbruker. Det ville kreve en vesentlig endring av forbrukeradferden, som vi ikke tror er realistisk. Dermed anser vi ikke dette som en optimal design innenfor design for gjenvinning. Merk dog at begrensningen om maks 60% arealdekning kun gjelder dersom etikett og beholder er av ulikt materiale. I den sammenheng er det også verd å bemerke at vi vil tillate cPET etiketter på PET-flasker, dersom dette blir godkjent av EPBP (The European PET Bottle Platform) og/eller RecyClass.

Vi vil oppdatere kravet til forbrukerinformasjon, slik at det blant annet blir mulig å bruke symboler. Det vil forhåpentligvis gi større fleksibilitet med hensyn til etikettdesign, og muligens føre til plassbesparelse.

VKH – Dansk Industri

O21: Etiketter for hård plastemballage og fleksible plastposer: Design for genanvendelse af emballage

Det skal bemærkes, at det ikke vil være muligt at lave en PE etiket med en PE laminat, da laminater i dag er fremstillet af PP. Et af argumenterne for at bruge laminater på etiketter i dag er, at de øger stivheden af etiketten hvilket giver en bedre etiketpåsætning. Derudover ønskerne virksomhederne at have muligheden for at bruge PP etiketter (med laminat) på PE flasker, da det er muligt at lave en mere transparent etiket ud af PP end PE.

Derudover er der en bekymring for, at hvis det ikke bliver tilladt at bruge papir etiketter (med laminat) på svanemærkede produkter kombineret med, at man skal leve op til krav om genbrugsemballager (og begge dele bevirker en prisstigning) vil en del af "low budget" produkterne blive tvunget til at gå væk fra svanemærket.

Til PET flasker ønskes muligheden for at kunne tilbyde sleeve på disse. En del af de ADW produkter, som er på markedet i dag har sleeve på. PET baseret sleeve (som vores virksomheder anvender) har samme kemiske egenskaber som den PET, der bliver brugt til flasker, hvilket øger muligheden for at genanvende emballagen. Ift. størrelsen af etiketten på en PET flaske kan det være en udfordring at gå med maks 60%, når der også sættes krav om forbruger information på etiketterne(O26+O27). En stor del af de emballager som bruges indenfor disse produktkategorier er i dag fremstillet af PET.

Der henvises endvidere til høringssvar afgivet af VKH medlemsvirksomheden Nopa Nordic A/S, med henblik på uddybning og flere detaljer.

Nordisk Miljömärknings kommentar

Takk for deres innspill. Se svar gitt til Nopa Nordic i avsnittet over.

Orkla Home & Personal Care

Kommentarer fra underleverandører:

Det vil ikke være mulig å lage PE-etikett med PE-laminat, da laminater i dag er laget av PP. Et argument for å bruke laminat på etiketter i dag er at de øker stivheten av etiketten, som gir en bedre etikettpåsetning. I tillegg, er det ønskelig med mulighet til å bruke PP etiketter (med laminat), på PE-flasker siden det er mulig å lage mer gjennomsiktig etikett av PP enn PE.

Til PET-flasker er det ønskelig å ha mulighet for å tilby sleeve på disse. En del maskinoppvaskprodukter på markedet i dag har sleeve på. Vår leverandør bruker PET-basert sleeve (som har de samme kjemiske egenskapene som PET som blir brukt til flasker), noe som øker muligheten for gjenvinning av emballasjen. Leverandøren produserer kun sleeve-produkt med perforering og veiledning for å øke mulighetene for gjenvinning av emballasjen.

I forhold til størrelsen av etiketten på en PET-flaske kan det være en utfordring å ha maks 60%, når det også settes krav om forbrukerinformasjon på etikettene (O26+O27). En stor del av emballasje som brukes innenfor disse produktkategoriene er i dag fremstilt av PET.

Nordisk Miljömärknings kommentar

Takk for deres innspill. Se svar gitt til Nopa Nordic i avsnittet over.

SPIF

Sid 19 pkt O21

“Paper labels must not be used.”

Under förutsättning att pappersetiketter är lätt avtvättbara i vatten (≤ 60 °C) så är det OK. Jämför gärna med Returpack ”Lim ska vara lösligt i 65°C varmt vatten innehållande en alkalielösning. Limmet ska ej återaktiveras vid lägre temperaturer efter upplösningen i vattnet.”

Bra att ni tar med ”PET-G (polyethylene terephthalate glycol modified)”. Detta eftersom IPA-modifierad PET är ett vanligt förekommande etikettmaterial. Eftersom PETG-materialen är amorfa så stör det i rekristalliseringsprocessen för ren PET.

Nordisk Miljömärknings kommentar

Takk for deres innspill. Etikettkravet vil bli oppdatert, bl.a. vil vi godta papiretiketter uten fibertap, som er godkjent i henhold til Recyclass Washing quick test procedure- For paper labels applied on HDPE & PP containers.

Unilever

O21: Labels for rigid plastic packaging and flexible plastic pouches: Design for recycling of packaging: The new criteria require that the labels for PE and PP bottles are made of the same type of plastic and that labels for PET bottles must be made of plastics from a different plastic type. Unilever recommends to allow for paper labels on all plastic bottles if they are attached with water soluble glues. Based on earlier feedback on this subject, we understand that most plastic recyclers use warm water to wash all plastics and therefore, paper labels placed with water-soluble glues will be removed from the recycling scheme. This change will allow for a more sustainable transition in factories currently using paper labels. Unilever also recommends to exclude removable shrink sleeved labels from the requirements.

Comments from Nordic Ecolabelling

Thank you for your input. We will accept paper labels without fiber loss, if approved according to Recyclash Washing quick test procedure- For paper labels applied on HDPE & PP containers. We will update the criterion accordingly. However, we will not exempt removable shrink sleeve labels. Removing a label is a manual operation that would require education of the consumer and substantial change in consumer behaviour. Hence, we do not see this as an optimal design within the concept of “design for recycling”.

Reckitt Benckiser

- Can we please include an exemption on “labels covering +60% of container” if the label/sleeve has perforated strip?
- Consumers will only learn to use the perforated strip if we actively engage consumers, have the strip on products and teach consumers how to properly recycle. The ambition to improve recycling is a joint task between manufacturers, Nordic Swan and consumers. We need to start this journey to also reduce the plastic amount moving forward and not simply expect that consumers won't do it. As consumer recycling habits have improved massively in the last couple of years, it is fair to assume they will continue to learn and recycle more effectively.

Comments from Nordic Ecolabelling

Thank you for your input. The label requirement will be modified. However, we will not accept perforated shrink sleeve. Removing a label is a manual operation that would require education of the consumer and substantial change in consumer behaviour. Hence, we do not see this as an optimal design within the concept of “design for recycling”.

O22 Paper-based packaging for solid products: Recycled material and Design for recycling

KiiltoClean

Opposed criteria: *Direct printing on the packaging must be done with water-based inks.*

We have understood that this is not that straight forward. The use of inks depends on printing technology. We hope that the meaning of this requirement was not to limit the choice of printing techniques. The consequences of this requirement should be investigated carefully by Nordic Swan organization. We feel that this requirement is anyhow secondary and does not reduce the environmental impact of paper-based packaging remarkably.

We suggest that the requirement of water-based inks is removed.

SPIF

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

Varför är andra tryckfärger inte accepterade? T ex: Spritbaserad tryckfärg (lösningsmedlet tas om hand vid tryckningen) eller UV-härdande tryckfärg.

Comments from Nordic Ecolabelling

Thank you for your comments. Upon further dialogue SPIF, Grønt Punkt Norge and IVAR all agreed that a possible and appropriate requirement could be that inks should be in accordance with EuPIA’s guidelines. Nordic Ecolabelling has chosen, however, not to include this as a separate requirement. Inks seem not to be a major issue for the recycling for paper-based packaging. Hence, the burden of managing an ink requirement that is linked to an external organization’s (EuPIA’s) requirements, is disproportionate for Nordic Ecolabelling’s case processing. We will delete the requirement on inks.

McBride

O22 We use labels on cardboard/corrugated boxes for customers. Requirement of paper labels not permitted is a problem for small products/SME customers (cost of product).

Comments from Nordic Ecolabelling

Thank you for your input. We will allow paper labels with water soluble adhesive. The criterion will be updated.

Unilever

O22: Paper-based packaging for solid products: Recycled material and Design for recycling: The new criteria requires 90% minimum content of paper/paperboard in cardboard packaging. Unilever recommends to reduce the level to 85% to accommodate for smaller packages.

Comments from Nordic Ecolabelling

Thank you for your input. However, based on license data and input from both laundry detergents and dishwasher detergents, we expect 90% to be achievable.

Orkla Home & Personal Care

Vår leverandør anser det som urealistisk å levere emballasje som består av minst 90% «post consumer waste.»

Den kvaliteten som er tilgjengelig fra vår leverandør kan kun garanteres med ca 70% PCR, og ein god del Post Industrial Waste. Vår tanke er at det kan være et krav om 90% resirkulert, men at %-del som må være PCR kan justeres ned til 70%

Senzora

The requirement says that cardboard packaging for solid products must contain at least 90% paper/paperboard and that a minimum of 90% by weight of the wood raw material that is used in the paper/cardboard must be made of post-consumer/commercial recycled material (PCR). PCR material is defined as material generated by households or by commercial, industrial and institutional facilities in their role as end-users of the product. We use a cardboard quality with the highest percentage recycled material (95-100% recycled). A percentage of 70-75% PCR material is confirmed by our packaging suppliers. The remaining percentage consists

of post-industrial waste. Our suppliers indicate that 90% PCR (so without recycling waste from industry) is not possible. So to our opinion a requirement on 90% recycled material is only possible, if the requirement on the minimum amount of PCR is adjusted to 70%.

Comments from Nordic Ecolabelling

Thank you for your input. We will adjust the definition of recycled material, and accept pre-consumer recycled material in addition to PCR.

O23 Cardboard packaging for liquid products: Sustainable material and Design for recycling

KiiltoClean

Opposed criteria: *Direct printing on the packaging must be done with water-based inks.*

We have understood that this is not that straight forward. The use of inks depends on printing technology. We hope that the meaning of this requirement was not to limit the choice of printing techniques. The consequences of this requirement should be investigated carefully by Nordic Swan organization. We feel that this requirement is anyhow secondary and does not reduce the environmental impact of paper-based packaging remarkably.

We suggest that the requirement of water-based inks is removed.

Comments from Nordic Ecolabelling

Thank you for your input. Fiskeby Board AB processes most of the cardboard packaging for liquid products in the Nordics. As they prefer water-based inks, we find it reasonable to maintain the requirement.

Grønt Punkt Norge

Generelt synes jeg det ser veldig bra ut. Den eneste kommentaren jeg har er til krav O23, der det står " Pappemballasje for flytende produkter må inneholde minst 60 % papir eller papp." Dette er begrunnet med " Kravet om minimum 60 % papir/kartong skal sikre en relativt høy andel papir/kartong som er resirkulert i Norge, Sverige og Finland. Plastfraksjonen av væskekartongen blir for tiden ikke materialgjenvunnet."

Dette samsvarer i og for seg med at vi på emballasjemerkingssidene våre skriver "Emballasje som i all hovedsak består av emballasjekartong skal merkes som kartong (*)". Samtidig så har vi en fotnote om at "(*) Grønt Punkt Norge ønsker å etablere grenseverdier hvor emballasje som ikke kan separeres og består av mindre enn 80% kartong bør merkes som restavfall."

Vi synes derfor at forslaget om at det holder med 60% papir eller papp er litt i snaueste laget. Vi samarbeider fortiden med flere av våre søsterorganisasjoner i Europa for å få på plass mer konkrete grenser for fiber og plast sammen. Grensene varierer mye, og begrunnelsene er vage for de grensene som er. Arbeidet med å få på plass tydelige, og faglig evaluerte grenser har tatt lenger tid enn vi hadde forventet.

Nordisk Miljömärknings kommentar

Takk for deres innspill. Vi er enige i at man bør tilstrebe høy andel papir/papp. I kravet for papirbasert emballasje for faste produkter (O22) krever vi således minst 90 % papir/papp. For flytende produkter har vi imidlertid forstått at plastandelen, spesielt for små emballasjevolumer, blir en del høyere. Vi har derfor, basert på dialog med interessenter innenfor slik kartongemballasje, kommet frem til en grense på 60 %.

O24 Weight-Utility Ratio (WUR)

McBride

WUR of 1,8 is a very strict limit and is a problem for PP foil products. Even the former limit of 2,75 was challenging for PP foil products. We will not be able to comply to this requirement if the limit cannot be relaxed.

Comments from Nordic Ecolabelling

Thank you for your input. We will revise the limit values, based on input from you as well as from other stakeholders.

Procter & Gamble

We would recommend having a WUR limit that is the same for Rigid Plastic or at minimum half of what is accepted today (2.7 [g/wash]) as limit for Dishwasher detergents in flexible plastic pouches.

Comments from Nordic Ecolabelling

Thank you for your input. We will revise the limit values, based on input from you as well as from other stakeholders.

Unilever

O24: Weight Utility Ratio: The WUR in the criteria draft has been decreased massively from 2.75 to 1.75 which can be a challenge for smaller boxes. We suggest to increase the WUR cutoff to 2 to enable filling of smaller boxes in the packaging lines.

Comments from Nordic Ecolabelling

Thank you for your input. We will revise the limit values, based on input from you as well as from other stakeholders.

Reckitt Benckiser

- Pouches: As 25% PCR is not feasible, reco is to increase as a minimum to 1g/wash.
- Cardboard packaging: Reco is to have WUR at 2,5g/wash or higher.

Comments from Nordic Ecolabelling

Thank you for your input. We will revise the limit values, based on input from you as well as from other stakeholders.

O25 Fill ratio

McBride

For our products, the limits have been tightened from 22 dosages/litre to 40 dosages/litre. This is a big change. For products in PP-foil this will no longer be

possible. For products in PVA-shrink foil this is still a problem for small boxes. Does this mean we would have to explore more concentrated/smaller tablet options in order to fulfil fill ratio requirements? This in turn would raise choke hazard and consumer safety issues. We have already optimised our small box capacity and capability.

Comments from Nordic Ecolabelling

Thank you for your input. We will revise the limit values, based on input from you as well as from other stakeholders.

Procter & Gamble

We would like to keep the fill ration 22 doses/litre as it is today.

Comments from Nordic Ecolabelling

Thank you for your input. We will revise the limit values, based on input from you as well as from other stakeholders.

Unilever

O25: Fill ratio in the draft criteria has been changed steeply from 22 to 40. We would like to request that the fill ratio requirement be changed to 35 to enable filling in the factory lines.

Comments from Nordic Ecolabelling

Thank you for your input. We will revise the limit values, based on input from you as well as from other stakeholders.

Reckitt Benckiser

- Reco is for fill ratios to remain unchanged as this requirement would indirectly be driven by tab weight and WUR.
- Due to quality and production line filling, it is simply not possible to increase the tab amounts in all products as max. fill rates are defined by manufacturing lines and quality.
- Your proposal is not technical feasible and our recommendation is 22>doses/liter.

Comments from Nordic Ecolabelling

Thank you for your input. We will revise the limit values, based on input from you as well as from other stakeholders.

4.3.6 Section 6, Consumer guidance

O26 Dosage instructions

Energimyndigheten

Sammanfattning

- Energimyndigheten tillstyrker förslaget med ett förslag på tillägg.
- För de konsumenter som har en diskmaskin utan avhårdare och bor i ett område med hårt vatten, är det viktigt att doseringsanvisningen för disk- och sköljmedel även innehåller dosering för vatten med en hårdhetsgrad som är högre än 6 dH°.

Energimyndighetens ställningstagande

Energimyndigheten tillstyrker förslaget med ett förslag på tillägg rörande doseringsanvisning.

Specifika synpunkter

Bra att krav på doseringsanvisning har tillkommit.

Nordisk Miljömärknings kommentar

Tak for jeres kommentar. Det er vores opfattelse at antallet af husstande med opvaskemaskiner uden vandafhærdere er meget begrænset, og vi anser derfor ikke tilpasningen som relevant.

McBride

OK requirement

Comments from Nordic Ecolabelling

Thank you for your support.

Reckitt Benckiser

- This requirement should not be applicable to tabs as the dosage is always 1 tab regardless of waterhardness.
- Does Nordic Swan believe it has any consumer relevance to mention wash temperature?
- Focus should be on recommending eco cycle and salt if hard water area.
 - Eg. Please use eco cycles and add salt if water is hard.
 - Focus on eco cycle should also be reflected in performance testing as the products would then be checked vs the actual consumer relevant method and on-pack recommendation.

Comments from Nordic Ecolabelling

Thank you for your comment. According to the detergent's regulation, the packaging shall bear information on the standard dosage expressed in e.g., number of tablets for the main washing cycle. Further, we consider the information relevant, as we have seen examples of dosage instructions recommending two tablets at higher water hardness/heavily soiled dishes, as well as consumer "saving tips", recommending to only use half tablets.

Testing on eco-program instead of the short cycle as specified in IKW2015 might result in less differentiation between the tested products. Differentiation, as achieved by short cycles and low temperature, is essential when comparing products and looking for strengths, weaknesses and differences. However, consumer behavior is one of the most important factors influencing the burdens in the life cycle of detergents and cleaning products and energy in the usage phase stands out as the largest parameter according to the MECO analysis described in the section "Environmental impact of dishwasher detergents and rinse aids" in the background document. Therefore, the following recommendation must be stated on the label (requirement O27): "Choose eco-program."

O27 Washing guidance on packaging

Kosmetik- og hygiejnebranchen

Kravet om at have mindre etiketter er ikke i overensstemmelse med kravene til information i O27. Det vil være meget vanskeligt at tilpasse teksten ud over alle de andre oplysninger, der skal være på etiketten. Kosmetik- og hygiejnebranchen

foreslår i stedet at godkende A.I.S.E.'s piktogrammer for at opfylde kravene i O27, se eksemplet nedenfor.



Kosmetik- og Hygienföretagen, KoHF

Kravet på att ha mindre etiketter går inte i ihop med kraven på information i O27. Det blir mycket svårt att få plats med texten utöver all annan information som ska stå på etiketten. KoHFs förslag är att godkänna AISEs piktogram för att uppfylla kraven i O27, se exempel nedan.



Procter & Gamble

We recommend to use AISE icon instead of text suggest in the criteria.



Nordisk Miljömärknings kommentar

Tak for jeres kommentar. Nordisk miljømærkning har forståelse for at det kan være udfordrende at få plads til mere tekst, mens etiketten gøres mindre. Nordisk Miljømærkning er positivt stemt over for piktogrammerne fra A.I.S.E., såfremt de kan tilpasses så de opfylder kravet, dvs. sproget skal tilpasses til det land produktet markedsføres i og der skal også laves et piktogram for sætningen ” Follow the dosing instructions”.

Unilever

O27: The new criteria suggestion exempts multifunctional tablets from including water softener guidance to use salts if they have passed the performance testing in higher water-hardness. Unilever recommends to require that multifunctional tablets are tested in higher water hardness without the use of rinse aids and salts as this is specifically what the products promise consumers.

Nordisk Miljömärknings kommentar

Thank you for your comment. Although multifunctional products normally include a salt function, this is not a requirement. A product promising cleaning and rinse function would also classify as a multifunctional product in our criteria.

Reckitt Benckiser

- Writing in a random Nordic language is not sufficient and not consumer relevant. There is a potential of dissatisfaction from eg. Finnish consumers if Danish advice is on-pack
- Instead lets streamline with AISE sustainability tips. This requirement should be fulfilled if AISE ADW tips are added on-pack.



Comments from Nordic Ecolabelling

Thank you for your comment. The requirement specifies the Scandinavian countries (Denmark, Norway, and Sweden), which have similar languages. Further, it is a voluntary option to only use one language.

Nordic Ecolabelling are positive towards the pictograms from A.I.S.E. if they can be modified to fulfil the requirement, i.e., the language should be adapted to the country in which the product is marketed and there should also be a pictogram for the sentence "Follow the dosing instructions".

McBride

OK requirement

Comments from Nordic Ecolabelling

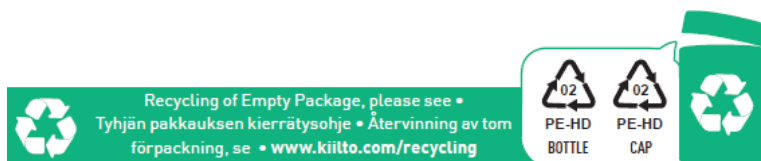
Thank you for your support.

O28 Information on recycling

KiiltoClean

Opposed criteria: *The product label must include information on how to recycle the packaging after use. The common Nordic pictogram system must be used**.

Our opinion is that the suggested labelling is not informative enough. We have used in our packaging detailed information about the packaging materials, and we even add instruction for recycling if there is space (please see some examples below). We strongly suggest that instead of this label a comparable label or information box can be used. There is a limited space on labels and it should be possible to give more information to consumers and other end users.



We suggest:

The product label must include information on how to recycle the packaging after use. The common Nordic pictogram system or comparable information can be used*. The information must be separated from the main text for easy recognition.

McBride

This is OK but which recycle pictograms/text are to be used if the products are sold outside Denmark, Norway, Sweden? What about Finland? The criteria needs to be clear of the requirements.

Nopa Nordic

Kravet til mærkning med affaldssorteringssymboler giver udfordringer på produkter der sælges i flere lande. Symbolerne er ikke ens og kommer til at fylde rigtig meget. Det skal være muligt at nøjes med et symbol og evt en tilpasset vejledningstekst.

SOK, Vähittäiskauppa

SOK sees the obligation to use the Nordic pictogram system in the product label very problematic due to various practical reasons. First of all, there is no common Nordic pictogram system created. Instead, the Nordic countries each have a rather similar, but still specific, unique national pictogram system. For example, for plastic packaging there is a Norwegian, Danish, Swedish and soon also a Finnish version of the pictogram. In practice, for a company like SOK, the obligation to use a Nordic pictogram system in the labelling, would mean that for products sourced as part of our Nordic sourcing collaboration, four different pictograms should be added to the product labelling. Naturally the amount of pictograms would double if the packaging includes two different packaging materials. Also, it should be noted, that the actual space in the product label is limited. Even today, without the pictograms, we struggle with the amount of information that needs to be fitted to the labels. Secondly, the pictogram system does not include a clear message for the consumer on how the packaging should be recycled, if the packaging includes multiple materials. Currently, we already add to all our Private Label product labels, a clear instruction in all the Nordic languages on how the packaging should be recycled: e.g. "Sort the bottle as plastic, and the sleeve as carton". This type of clear messaging is lacking from the pictogram system. The new recycling symbols may confuse consumers' sorting, as recycling is organized in slightly different ways in different countries and waste management companies have often instructed sorting on the material based recycling symbols already in use. Therefore, we very much welcome the proposal that "the product label must include information on how to recycle the packaging after use." However, a company should have the freedom to decide themselves how they communicate the recycling instruction in the label to the consumer in the most efficient and clear way.

Orkla Home & Personal Care

Kommentarer fra underleverandører:

Kravet til merking med avfallssorteringssymboler gir utfordringer på produkt som selges i flere land. Symbolene er ikke like og kommer til å bruke en del plass. Det burde være mulig å nøye seg med ett symbol, og eventuelt en tilpasset veiledningstekst.

Unilever

O28: Information on recycling: The draft criteria require the use of the “common Nordic pictogram system” as the information for recycling. Unilever recommends to exclude this requirement as this is not commonly understood recycling pictograms. Based on the information on the pages shared, the pictograms are intended to be used across the Nordic region in recycling stations to ensure one common style at the stations and not primarily for consumer packaging.

VKH – Dansk Industri

O28 Information om genanvendelse (O20 i generation 6). Det fælles nordiske piktogramsystem fra 2020 skal anvendes.

Det skal bemærkes, at kravet til mærkning med affaldssorteringssymboler giver udfordringer på produkter der sælges i flere lande. Symbolerne er ikke ens, som er uhensigtsmæssigt og kommer til at fylde rigtig meget. Det bør være muligt at forenkle og dermed nøjes med et symbol og evt. en tilpasset vejledningstekst.

Dagrofa ApS

Jeg har en kommentar til: ” O28 Information om genanvendelse (O20 i generation 6). Det fælles nordiske piktogramsystem fra 2020 skal anvendes. ”

Er de piktogrammer, som man finder på Dansk Affaldsforenings hjemmeside blevet ’Fælles Nordiske’?

Hvis ja, så har jeg ingen kommentarer.

Hvis nej, syntes jeg det er problematisk, da vi i over et år har arbejdet med at sætte de piktogrammer på, som man kan finde på Dansk Affaldsforenings hjemmeside, og som danske forbrugere er ved at lære at kende via deres affaldsordninger derhjemme i husstandene...

Svensk Dagligvaruhandel

Vi instämmer i att konsumenterna ska få information om hur en förpackning ska materialåtervinnas men anser inte att Avfalls Sveriges piktogram ska vara obligatoriska. Dessa piktogram kan rekommenderas men inte krävas.

En svårighet med piktogrammen är att de skiljer sig åt mellan de nordiska länderna varför en samnordisk förpackning behöver utrustas med flertalet piktogram för samma material, se figur 1 för exempel för plastförpackningar. Detta tar mer plats på förpackningen samt ger ökad tryckkostnad och på grund av detta ser vi en risk att kravet på Svanen-märkningen uteblir för samnordiska produkter.



Figur 1. Avfallssymboler i de olika nordiska länder. Från vänster Sverige, Danmark och Norge.

En annan svårighet är att många av produkterna på marknaden är framtagna för att kunna säljas i flertalet länder runt om i Europa, inte bara i Norden. Eftersom piktogrammen i dagsläget är frivilliga att använda och endast anpassade för Norden kan dessa krocka med märkningskrav i andra länder. Helst skulle vi se en gemensam europeisk återvinningsmärkning för att undvika röriga förpackningar med för mycket information, men tills denna är på plats vill vi åtminstone undvika suboptimerade krav som försvårar för både producenter och konsumenter. Om Avfall Sveriges piktogram blir obligatoriska kommer det leda till att separata

förpackningar måste tas fram för olika marknader vilket i sin tur leder till ökade kostnader i både produktion och lagring, risk för ökat svinn samt en risk att företag kommer välja bort Svanen-märkningen pga. tidigare nämnda skäl.

Ett förslag på krav som gör det lättare för konsumenten att hitta sorteringsinformationen kan vara att förtydliga var på förpackningen information om återvinning ska framgå och hur den ska källsorteras.

Comments from Nordic Ecolabelling

Thank you for your input. We agree that alternative ways to communicate the sorting instructions should be allowed. We will update the criterion accordingly.

The alternative communication should be done in an equally clear way for the consumer. E.g., “sort as plastic packaging” should be used instead of the term PE-HD, as “plastic packaging” is the fraction that the consumer relates to.

Differences between the symbols in the different Nordic countries have been pointed out by stakeholders. While printing symbols with different design but equal meaning should not be necessary, Nordic Ecolabelling wants to point out that in case there are actual differences from one country to another in how the consumer should sort the waste, the correct way of sorting must be communicated for each Nordic country in which the product is for sale (e.g. corrugated cardboard should be sorted in a separate fraction in Sweden and Denmark, whereas it should be sorted together with paper in Norway).

4.3.7 Appendices

Appendix 4. Declaration from the manufacturer of the primary packaging component – plastic packaging; paper-based packaging for solid products

Woodly Oy

Reasonings: For the improvements and future needs the Nordic Swan Ecolabel should consider to include as part of "the Appendix 4 Declaration from the manufacturer(s) of the packaging" a section to declare the bio-based material (i.e. cellulose-based plastic material) used in the labels, claim the applicable certification scheme for the cellulose-based bio-based plastic material and present a life cycle assessment or similar for the environmental impact.

Proposed additions: For labels applied to containers: Declaration of the bio-based plastic material used for labels / Is the renewable raw material certified? (Yes / No). If yes, please state the raw material 's certification system. / Is the life cycle assessment (or similar) completed and verified by 3rd party? (Yes / No).

Comments from Nordic Ecolabelling

Thank you for your input. We agree that this would be interesting information. However, in order to make the application process as smooth as possible, we chose not to require information that is not directly related to the current requirements.

SPIF

Appendix 4 pkt O19

“Are any barriers used in the component? Yes No

Varför ingen uppföljningsfråga om materialtyp och mängd?
Samma gäller pkt O20.

Nordisk Miljömärknings kommentar

Takk for deres innspill. Vi har ikke med oppfølgingsspørsmål for hard plastemballasje (O19), fordi vi ikke tillater noen barrierematerialer. For fleksible plastposer (O20) vil vi legge til oppfølgingsspørsmål.

5 Comments to the background document

One comment. Part of Miljøministeriet's comment to requirement O5 Prohibited substances is related to the background document. Se Miljøministeriet's entire comment to O5 in chapter 4, above.

6 Discussion and conclusions

The new requirement O14 Water-soluble film was commented by many stakeholders. The comments were primarily aimed at the requirement of "ready biodegradation", as this can be a rather hard test result to achieve for some of the PVA films. Some stakeholders suggested to allow "enhanced biodegradation" where longer incubation and continued biodegradation measurements up to 60 days is used. This method was discussed with an independent third-party and has been implemented in the requirement. Further, some of the film producers are manufacturing a wide range of films with smaller variations, and testing on each variant would be a big burden for them. Therefore, Nordic Ecolabelling has developed a framework for prediction of biodegradation of water-soluble films based on existing data. This is also introduced in the revised requirement.

The performance testing was also commented by several stakeholders. The conditions were adjusted, to give more flexibility and possibility for testing at more consumer relevant conditions (O16: adjustment of water hardness, as well as some clarifications in the framework for rinse aid testing (O17)).

Several changes have been implemented on the packaging requirements after the consultation. In particular on the label requirement (O21). It is broad agreement that PP label on PP packaging and PE label on PE packaging is the optimal solution regarding sortability and design for recycling. Some producers have already adapted completely to this. However, several others still use paper labels as well as different plastic materials. Overall, we realize that the requirement would be too tough in the current market situation. Fortunately, the recently published Recyclclass Washing quick test procedure- For paper labels applied on HDPE & PP containers, now allows for differentiating between paper labels with and without fiber loss. O21 has been modified to allow for paper labels without fiber loss, and at the same time allowing for other label combinations that can be regarded as equally performing in terms of sortability and recyclability. Two substantial changes were done to flexible plastic pouches. First, we have decided that the label requirements do not apply to the pouches. Most stakeholders still apply direct printing on the pouch. This was only commented by McBride in "other product groups" (see Appendix 1), but the status was confirmed by stakeholders within dishwasher detergents when we asked

specifically about it as a follow-up question. Moreover, all the stakeholders that have commented flexible plastic pouches (O20) are unanimous that PCR material is not yet feasible in pouches of monomaterial. Accordingly, the PCR requirement has been removed. The limit values for weight-utility ratio and fill ratio have been adjusted based on stakeholder input during the consultation, as well as on additional data provided by several stakeholders during follow-up meetings.

An overview of the changes which have been done based on the consultation responses, is given in table 2 below.

Table 2. Overview of the main changes done in the draft generation 7 of the criteria, based on consultation responses.

Requirement in the draft for consultation	Change in the requirement after the consultation, based on consultation responses
O3 Certified raw materials from oil palms	It has been clarified what documentation is required.
O5 Prohibited substances and O6 Phosphorous	The limit value for phosphorous has been increased from 0.10 g/wash back to 0.20 g/wash. At the same time, phosphates were added to the list of prohibited substances in O5.
O12 Critical dilution volume (CDV)	The limit value for rinse aids has been increased from 3.000 to 5.000 litres/wash.
O14 Water-soluble film	Total composition has been clarified. "Enhanced biodegradation" has been included in the requirement. A framework for prediction of biodegradation of water-soluble films has been specified.
O16 Performance of the dishwasher detergent	Testing with harder water has been allowed, according to specified test design.
O17 Performance of the rinse aid	The test result requirement has been reduced from at least parity on all objects on spotting and filming to parity or better on at least 6 of the 8 criteria. Conditions regarding water hardness and dosage have been clarified.
O19 Rigid plastic packaging: Recycled material and Design for recycling	A recommendation not to use PCR qualities that are intended for foodstuffs has been added to the background text.
O20 Flexible plastic pouches: Recycled material and Design for recycling	The requirement to use minimum 25% PCR material has been removed.
O21 Labels for rigid plastic packaging and flexible plastic pouches: Design for recycling of packaging	Paper labels without fibre loss have been allowed. For PE and PP containers: Polyolefin plastic labels (PE and PP), PET or PET-G labels with density > 1.0 g/cm ³ have been allowed. Flexible pouches have been removed from the label requirement. (Accordingly, direct print on flexible pouches is allowed.)
O22 Paper-based packaging for solid products: Recycled material and Design for recycling	Paper labels with water soluble adhesive has been permitted. The requirement that direct printing on the packaging must be done with water-based inks has been removed. A ban on solid coloured cardboard has been added The requirement of 90% and 70% PCR in cardboard and corrugated board respectively, has been changed to 90% and 70% recycled material, including recycled material from the pre-consumer phase.

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O24 Weight-Utility Ratio	The limit values have been adjusted.
O25 Fill ratio	The limit values have been adjusted.
O27 Washing guidance on packaging	Pictograms are accepted.
O28 Information on recycling	The requirement text has been modified. Using the Nordic pictogram system is no longer mandatory.

Appendix 1. Consultation comments on requirement O21 for other product groups.

The label requirements in O21 were based on the findings in a label project run by Nordic Ecolabelling in the summer/autumn of 2020 for laundry detergents (product group 006), cleaning products (group 026) and hand dishwashing detergents (group 025). Hence, licensees within these product groups, as well as licensees within car, boat and train care products (group 013), were invited to comment specifically on O21, in the context of their respective product group. These answers are included in this appendix.

Clemondo (013 and 026)

Generellt har vi inga invändningar mot revisionen av O21. Vi har dock synpunkter kring implementeringen.

Vi arbetar aktivt med att minska leveranserna av etiketter till företaget, dvs vi beställer större mängder av etiketter med längre mellanrum för att göra leveranserna effektivare både kostnads och miljömässigt. Det är därför av största vikt att implementering av reviderat kriterie O21 sker under en längre tid, flera månader, för att vi i största möjliga mån skall undvika destruktions av ej godkänt material.

Nordisk Miljömärknings kommentar

Takk for deres innspill. Vi vil innvilge en overgangstid ved implementering av nye etikettkrav.

Orkla Home & Personal Care (006, 025, 026)

Samtlege av produkta innfrir i dag det føreslåtte kravet O21. Det kom ikkje inn andre tilbakemeldingar på kravet, utover det som var innsendt november 2020.

Kommentarar på dette kravet angående produkta innan maskinoppvask er innsendt i vår tilbakemelding på forslaget til dei reviderte kriteria for maskinoppvask.

Nordisk Miljömärknings kommentar

Takk for deres tilbakemelding.

Nopa Nordic

O20: Det er ikke muligt at lave fleksible poser i genbrug grundet at materialet ikke er tilgængeligt. Det er OK med mono materialer til fleksible poser så længe det ikke skal indeholde genbrug.

O21: Det vil ikke være muligt at lave en PE etiket med en PE laminat grundet at laminater i dag er fremstillet af PP. Et af argumenterne for at bruge laminater på etiketter i dag er at de øger stivheden af etiketten hvilket giver en bedre etiket påsætning. Derudover vil vi gerne have muligheden for at bruge PP etiketter (med laminat) på PE flasker da det er muligt at lave en mere transparent etiket ud af PP end PE.

Derudover er vi bekymret for at hvis det ikke bliver tilladt at bruge papir etiketter (med laminat) på svanemærkede produkter vil en del af "low budget" produkterne blive tvunget til at gå væk fra svanemærket. Grunden til dette er at plast etiketter er over 100% dyrere end papir etiketter. Dette kombineret med at de

bliver tvunget over i genbrugs emballager(hvilket også giver en prisstigning) kan presse "low budget" produkterne væk fra at bruge svanemærket.

Til PET flasker vil vi gerne have muligheden for at kunne tilbyde sleeve på disse. En del af de ADW produkter som er på markedet i dag har sleeve på. Vi bruger udelukkende PET baseret sleeve(har samme kemiske egenskaber som den PET der bliver brugt til flasker) hvilket øger muligheden for at genanvende emballagen. Derudover producerer vi kun sleeve produkter med perforering og vejledning for adskillelse for at øge genanvendelses mulighederne af emballagen.

Ifht størrelsen af etiketten på en PET flaske kan det være en udfordring at gå med maks 60% når der også sættes krav om forbruger information på etiketterne(O26+O27). En stor del af de emballager som bruges indenfor disse produktkategorier er i dag fremstillet af PET.

Nordisk Miljömärknings kommentar

Takk for deres innspill. Kraw O21 vil bli modifisert. For øvrige innspill viser vi til svar under O21 i kapittel 4.

SCJohnson (026)

At SC Johnson we are committed to minimising our environmental footprint and work towards the new plastic circular economy. As a global partner of Ellen Macarthur foundation, we are committed to eliminating unnecessary plastic, ensuring that 100% of our plastic packaging is recyclable or reusable, while also increasing the usage of Post-consumer recycled plastic.

We have analysed your draft proposal and we have concerns about the availability of the proposed alternatives and potential impacts to our manufacturing processes. Following your guidance, we have replaced our perforated full-body sleeves by smaller paper labels to improve our packaging recyclability. Our perspective is that we can't look only at the label materials, but the full product packaging design, including the impact the different adhesives.

We continuously work with our suppliers and are committed to improve the design and materials of our packaging for greater recyclability. We will continue to explore alternative solutions, including the use of alternative adhesives, but this will take some time to teste and implement.

Comments from Nordic Ecolabelling

Thank you for your input. The label requirement will be modified.

Unilever (006)

Containers in polyethene (PE) and polypropylene (PP), must have a label with the same plastic material as the packaging and Paper labels must not be used.

Although packaging consisting mainly of PE or PP and with a paper label or tag is sub-optimally recyclable, several recyclers, especially those specializing in PET, use a hot-wash process that does remove paper labels and tags completely. The paper is then separated from the packaging but not recycled itself. **We recommend that there is an allowance for paper labels when washable adhesives are used as**

several recyclers have started washing PE and PP at hotter temperatures, allowing for the use of hot wash adhesives.

Today, Unilever uses paper labels on HDPE bottles for Nordic Swan endorsed laundry liquids produced at the Odense factory site. Our current labelling machines cannot run PE labels. We have trialled with PE labels in our factory, but we see major issues with wrinkling and skewed label adhesion. This is especially problematic in the larger formats. To be able to move to PE labels we would need to replace current labelling machines. In addition to scrapping fully functioning machinery this means huge cost.

Packaging in polyethylene terephthalate (PET) must have a label of a different plastic material, with a density < 1.0 g/cm³ and For labels of different material than the packaging (PET containers): Labels must not cover more than 60% of the container.

For PET bottles, the two main label types are either wrap around labels (such as those seen on soft drink bottles) or Shrink sleeves. Within the homecare category, wrap around labels are typically PP based which is not a problem. However, all PET bottle solutions are not suitable for wrap around labels.

PET bottles today do often have shrink sleeves made of G-PET. Shrink sleeves do have importance in packaging such as UV protection for sensitive formulations as well as giving more aesthetic associations for the product. Furthermore, PET bottles are often more prone to scratching and scuff marks during production and shrink film labels allow for less quality exclusions during production. With the increased use of Recycled PET the aesthetics of the packaging change to become less clear and as such, the final product aesthetics are compensated with the use of full bottle sleeves.

Shrink sleeved can be perforated for simple removal by consumers, but even if the consumer does not remove the perforated sleeve before recycling it is expected to come off during the rough handling of baling, transport, unbaling and handling before the actual sorting process. There are also some companies working on alternative sleeves with lower levels of glycol which allows for full sorting and recycling despite the label being made of the same material.

We recommend that there are allowances for new innovative PET sleeve solutions by, for example, giving derogations on if you can prove that the label does not impede recycling of the bottles.

We also recommend allowing for PET shrink sleeve labels on the condition that they are perforated for easy removal.

Comments from Nordic Ecolabelling

Thank you for your input. The label requirement will be modified. However, we will not accept perforated shrink sleeve. Removing a label is a manual operation that would require education of the consumer and substantial change in consumer behaviour. Hence, we do not see this as an optimal design within the concept of "design for recycling".

Wilhelmsen (013)

Vi i Wilhelmsen Chemicals AS har diskutert høringsforslaget dere henviser til (ref.mail mottatt 9. mars 2021).

Dersom dette skulle vært implementert i nye kriterier, mener vi dette burde ha kommet tidligere. Endring av etiketter er tidkrevende – både internt og for etikettleverandørene. Det vil også kunne generere merkostnad i form av kassering av store mengder med etiketter som allerede er på lager. Hvordan kan miljøregnskapet forsvares her?

Wilhelmsen Chemicals AS er en av verdens ledende produsenter og distributør av marine kjemikalier. I Skandinavia har vi en ledende posisjon som produsent. Vi er nå godt i gang med fornyelse av lisensen for Bil- Båt- og togpleiemidler. Fire av våre syv produkter vi nå søker om fornyelse på, er store marine produkter. Med hensyn til våre marine produkter, blir det også feil å legge til grunn en referansene til avfallshåndtering og resirkulering i Norden. Produktene eksporteres globalt, og ender etter gjeldende IMO regler opp i resirkuleringssystemer organisert i alle verdens havner. Svært få av disse vil være teknologisk sammenlignbare med hvordan denne bransjen opererer i Norden.

Dersom endringen likevel gjennomføres, foreslår vi at endringer for etikettkrav begrenses til produkter for konsumentmarkedet. Evt kan det gjøres et tilsvarende skille ved å begrense kravet til «småemballasje» i første omgang.

Nordisk Miljömärknings kommentar

Takk for deres innspill. Vi vil innvilge en overgangstid ved implementering av nye etikettkrav. Større emballasje vil unntas etikettkravene, der dette allerede er presisert for emballasjekravene i kriteriene.

KiiltoClean (006, 025, 026)

Referring to the proposed criterion O21 on label requirements for dishwasher detergents and rinse aids, and hand dishwashing detergents, cleaning products and laundry detergents, we would like to bring up our comments.

Opposed criteria: Containers in polyethene (PE) and polypropylene (PP), must have a label label with the same plastic material as the packaging (i.e. PE-label on PE packaging and PP-label on PP packaging).

We are very concerned about the fact that this part of the criteria is limiting new label material development. There are new label materials that reduce the environmental impact of plastic. Especially interesting is the development by Woodly. Woodly is bringing to the market a new label material, so called wood-based plastic, which is based on cellulose, renewable certified raw material. This material is reducing dependence on fossil-based materials and thus boosting circular economy.

We think that Nordic Swan criteria should not limit the use of new advanced label materials. In order to allow the positive development, we ask The Nordic Swan Ecolabel to consider and take into account the following with regard to the criteria for label materials:

- allow the use of labels for PE and PP packaging made of such materials that reduce environmental impact compared to traditional label materials, PE and PP
- apply the same criteria for PE and PP packaging labels that is proposed for PET containers with different label materials, i.e. labels must not cover more

than 60 % of the container

We suggest:

Containers in polyethene (PE) and polypropylene (PP), must have a label with the same plastic material as the packaging (i.e. PE-label on PE packaging and PP-label on PP packaging).

- ***Exemption: Other label materials can be accepted if the new material has less environmental impact than PE or PP label material. The proof of having less environmental impact must be based on life cycle assessment or similar.***

Opposed criteria: For labels of different material than the packaging (PET containers): Labels must not cover more than 60% of the container. 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 pack are of different size, the maximum percentage of 60% shall be fulfilled for each side separately. For a cylindrical bottle, the calculation can also be based on the three-dimensional profile exclusive bottom and top of the bottle.

We feel that this criteria about label surface area is based on mainly consumer packaging. Canisters that are used typically in B2B packaging, have a remarkable surface area in the side of the packaging. The canisters can be from 3 L up to 20 L or even more. B2B packaging is not sorted automatically in Finland. The recycling system is different for B2B packaging. Even if the sorting would be based on NIR technology the canisters have big surface area to enable correct detection. That is why we suggest that all 4 sides and the bottom of the canister are calculated to the total surface area of the packaging.

We suggest:

For labels of different material than the packaging: Labels must not cover more than 60% of the container. 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 pack are of different size, the maximum percentage of 60% shall be fulfilled for each side separately. For a cylindrical bottle, the calculation can also be based on the three-dimensional profile exclusive bottom and top of the bottle. For canisters (> 2 L) the calculation can also be based on the three-dimensional profile including bottom, but excluding top of the canister.

Comments from Nordic Ecolabelling

Thank you for your input. The label requirement will be modified. Regarding the percentage of 60% label coverage, this is indeed linked to the NIR sorting. However, as the labels are currently, in most cases not recycled, it is desirable to limit the label size also from a resource point of view. Hence, we will maintain the requirement also for bigger packaging, unless otherwise mentioned. (In some criteria documents,

packaging > 200 litres are exempt from the packaging requirements. Accordingly, exemptions from label requirement will also apply).

McBride plc (006, 025 026)

Containers in polyethene (PE), polypropylene (PP) must have a label with the same plastic material as the packaging (i.e. PE-label on PE packaging and PP-label on PP packaging

We currently are not able to implement PP or PE labels on all formats due to machinery & equipment limitations.

Packaging in polyethylene terephthalate (PET) must have a label of a different plastic material, with a density <1.0 g/cm³

We currently are not able to implement PP or PE labels on all formats due to machinery & equipment limitations.

PET-G (polyethylene terephthalate glycol modified), polyvinyl chloride (PVC) and other halogenated plastics must not be used in labels

OK requirement.

Paper labels must not be used

With the new restriction on paper labels, we are not able to comply with this requirement today. All our Nordic Swan products use paper labels on plastic packaging today. We will have to perform a cost benefit analysis, look at materials and machinery, and review our Nordic Swan products portfolio versus traditional detergent products manufactured on site. Given the current technical issues, (compatibility of packaging with existing machinery versus quality of product) in order to successfully implement and comply with this criteria change, we will need a longer transition period than 12 months. More realistically, this should be 24 months instead of 12 months. This new requirement means significant investment and big changes to the manufacturing process and manufacturing sites of McBride.

Metallized labels / shrink film labels are not permitted

OK requirement.

For labels of different material than the packaging (PET containers): Labels must not cover more than 60% of the container. 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 pack are of different size, the maximum percentage of 60% shall be fulfilled for each side separately. For cylindrical bottle, the calculation can also be based on the 3-dimensional profile exclusive bottom and top of the bottle

This is OK for the labels.

Direct print on the container is not permitted except for date codes, batch codes and UFI

(Commented only for laundry detergents). This is an issue for our doypacks. Pre-printed monomaterial doypacks are fully recyclable. The technology is now evolving with inclusion of recycled plastic waste (pcr). Flexible pouches allow further reduction of plastic packaging weight per wash. Actually it is the same solution but with less plastic. The period of transition is far too short as we are just organizing the switch to a more pcr content in tub. Permanent changes of the criteria in such a

short timing creates not only consumer incomprehension but also disengages detergent manufacturers and retailers to support this very frame. Simply because of the impossibility for the stakeholders to follow that speed of changes with short term large manufacturing investment, supply chain and logistic disruption and retail selling price changes leading to confusion for consumers and finally frame credibility. Therefore, a longer transition period than 12 months should be granted as the change implies product cost changes and so commercial re-negotiation, which relies on the speed of customer acceptance.

Comments from Nordic Ecolabelling

Thank you for your input. The label requirement will be modified. Paper labels without fiber loss will be allowed. Direct printing will be allowed on doypacks.

Diversey (006, 017, 026)

In regards to the consultation on the labels for the Swan on the categories cleaning products and laundry detergent, after assessment on our products, I wanted to let you know that we do not have new comments on this new proposal taking into account the ones from Nov 2020 consultation.

Comments from Nordic Ecolabelling

Thank you for your input.