

To consultative bodies

Your ref.	Our ref.	Date
	2019011/1.1.3/AW/rbr	16.12.2019

Consultation proposal concerning revised criteria for Nordic Ecolabelling for car, boat and train care products

Nordic Ecolabelling hereby invites you to comment on our proposal for revised criteria for car, boat and train care products.

We also invite you to a webinar on **January 23rd, 2020** to introduce and discuss the proposal. For registration, please send an e-mail to caroline.karlsson@svanen.se within January 16th, 2020 to get a link to the webinar.

The proposed criteria have been prepared by representatives from the Nordic Ecolabelling offices under the leadership of Caroline Karlsson. Please contact the Norwegian office if you wish to receive a hard copy of the documents and/or a list of the bodies consulted.

Nordic Swan Ecolabelled car, boat and train care products are assessed based on a life cycle perspective and fulfil high environmental and health requirements. Nordic Swan Ecolabelled car, boat and train care products:

- Meet strict requirements regarding environmentally hazardous chemicals, including requirements targeting ecotoxicity and degradability.
- Comply with tough requirements relating to chemicals that are harmful to health, including a ban on substances that are classified as carcinogenic, mutagenic or reprotoxic.
- Perform effectively and produce the required results.
- Meet tough requirements concerning volatile organic compounds and thus make a minimal contribution to the formation of tropospheric (near ground level) ozone.
- Have packaging that contributes to a circular economy, not least through its design and material choices.
- Have information on the packaging about how to use the product. This includes instructions on washing in a location where the drains are connected to a water treatment plant in order to protect the environment.

What has been changed?

- The product group has changed its name to car, boat and train care products and been expanded to include products for trains and other rail transport.
- Requirement for purchasing policy regarding sustainable, renewable raw materials is introduced.
- Requirements for substances prohibited from products have been increased by including MI, BHT and D6.
- Fragrances must not be present in consumer products and professional pre-wash products.
- Preservatives that are judged to be sensitising with hazard code H317 and/or H334 may only be present in the product to a maximum of 0.0100% (100 ppm).
- Requirement for long-term environmental effects have been tightened regarding limit values and exceptions for surfactants.
- CDV requirements are based on chronic data instead of acute data. The product types are updated and the limit values for CDV have been tightened for all product types.
- The ethanol in windscreen washer fluid must be based on renewable raw material and on an annual basis at least 50% must be produced from a residual product in line with the

Renewable Energy Directive (EU) 2018/2001. The ethanol must not be based on sugar cane.

- Pre-mixed windscreen washer fluid can be Nordic Swan Ecolabelled.
- Requirements for recycling design of plastic packaging, closures and pouches have been introduced.

We would very much appreciate your comments on the proposed criteria. We kindly ask you to send your comments to us no later than **February 28th 2020**, via the submission form on our website (<http://www.svanemarket.no/modules/remiss/>), by mail or by e-mail to post@svanemarket.no. For questions, please contact Randi Barstad Rødseth, phone +47 995 22 486 or rbr@svanemarket.no

A summary of the consultation comments that are received will be available at Ecolabelling Norway.

Best regards,
Ecolabelling Norway



Anita Winsnes
Managing director

Appendix

Appendix 1

We wish to highlight the following points in the consultation draft:

Extension of the product group with pre-mixed windscreen washer fluid

Nordic Swan Ecolabelled windscreen washer fluid must meet the requirements concerning constituent substances, the degradability of organic substances and ecotoxicity. The ethanol must be based on renewable raw material and on an annual basis at least 50% must be produced from a residual product in line with the Renewable Energy Directive (EU) 2018/2001. The ethanol must not be based on sugar cane. Furthermore, the packaging must be designed to facilitate material recovery. For more information, see Section 6 Supplementary requirements for windscreen washer fluid in the background document.

O3 Sustainable raw materials

The licence holder must document that they are working on increasing their purchases of renewable raw materials that are sustainable and/or that they require the manufacturer to work on increasing its purchase of sustainable, renewable raw materials for Nordic Swan Ecolabelled car, boat and train care products.

O4 Classification of the product

Products labelled as EUH208 “Contains (name of sensitising substance). May cause an allergic reaction” cannot be Nordic Swan Ecolabelled.

O5 Classification of constituent substances

Classification with H317 and/or H334 is prohibited, with some exceptions.

O6 Organic substances, degradability

- Do synthetic waxes contain microplastics?
- Can synthetic waxes be replaced with natural waxes (which are not defined to contain microplastics)?

O7 Substances prohibited from products

- MI (methylisothiazolinone, CAS no. 2682-20-4) is prohibited
- BHT (butylated hydroxytoluene, CAS no. 128-37-0) is prohibited
- D6 is prohibited in addition to the siloxanes D4, D5 and HMDS

O8 Fragrances

Fragrances must not be present in consumer products* and professional pre-wash products. Pre-wash products include alkaline degreasers, cold degreasers, microemulsions, insect removers and wheel rim cleaners.

O9 Preservatives

Preservatives that are judged to be sensitising with hazard code H317 and/or H334 may only be present in the product to a maximum of 0.0100% (100 ppm).

O12 Long-term environmental effects

- The total limit value for substances classified as H410, H411 and H412 has been lowered from 1.5 to 0.5.
- Surfactants classified as H411 can no longer be exempted from the requirement.
- The limit value for substances classified as H400 has been lowered from 1.2 to 0.4 grams/litre of working solution.

O13 CDV

- Engine wash has been deleted, as these products are degreasers.
- Window wash has been deleted, with these products instead belonging to other product types.
- Degreasers are split into alkaline degreasers, cold degreasers and microemulsions.
- Wheel and rim cleaners and insect cleaners have been separated out from other products.
- Transition from acute to chronic data.
- The limit values for CDV have been tightened for all product types.

O16 Recycling design of plastic packaging and closures (excluding pouches)

Plastic packaging must have a design that facilitates material recovery.

O17 Recycling design of pouches

Pouches must have a design that facilitates material recovery.

O19 Packaging for foam products

Only sprays with a foaming nozzle can be Nordic Swan Ecolabelled.