

## Appendix 1 Declaration from the manufacturer of the hand dishwashing detergent

To be submitted with an application for a Nordic Swan Ecolabel license of hand dishwashing detergents.

This declaration is based on the available knowledge at the time of the application, including test results and/or declarations from raw material manufacturers. It is subject to change, if new information or scientific findings become available. In such cases, an updated declaration must be submitted.

<b>Product name:</b>	
<b>Type of product:</b>	
<b>Professional product</b> <i>Products that are marketed for use in professional contexts such as institutions, catering kitchens, restaurants and within the public sector. Products are considered for the professional market if more than 80% of sales are to professional users.</i>	<input type="checkbox"/>
<b>Consumer product</b> <i>Products that are marketed towards retailers and/or consumers. Products are considered for consumer use if 20% or more of sales are to consumers</i>	<input type="checkbox"/>

*Where there is any confusion about whether a product is for professionals or consumers, Nordic Ecolabelling may require documentation explaining where the product is intended to be sold.*

The requirements in the criteria document and accompanying appendices apply to all ingoing substances in the hand dishwashing product. Impurities are not regarded as ingoing substances and are exempt from the requirements. Ingoing substances and impurities are defined as below, unless stated otherwise in the requirements.

- **Ingoing substances:** All substances\* in the hand dishwashing detergent including additives (e.g. preservatives and stabilisers) from the raw materials. Substances released from ingoing substances (e.g. biocidal active substances generated by preservatives, such as formaldehyde) are also regarded as ingoing substances.

*\*N.B. the difference from the definition of substances in the REACH Regulation (EC) No 1907/2006. Whereas a REACH substance encompasses a chemical element or compound as well as its stabilising additives and process impurities, a substance here refers to each of the constituents separately. The constituents of a UVCB substance (Unknown or Variable composition, Complex reaction products or of Biological materials) are also regarded separately, and all known constituents must be regarded.*

- **Impurities:** Trace levels of pollutants, contaminants and residues from production, incl. production of raw materials that remain in the hand dishwashing detergents in concentrations  $\leq 100$  ppm ( $\leq 0.0100$  w%). For formaldehyde other than as a biocidal active substance and for arylamine, the corresponding concentration is  $\leq 50$  ppm ( $\leq 0.0050$  w%).

*Examples of impurities: Background environmental pollutants from feedstock, as well as contaminants and residues from production such as reactants (incl. monomers), reagents, catalysts, by-products, scavengers, detergents for production equipment, carry-over from other or previous production lines.*

- **Impurities in the raw materials** in concentrations  $\geq 10\,000$  ppm ( $\geq 1.0000$  w%) are always regarded as ingoing substances, regardless of the concentration in the Nordic Swan Ecolabelled product.

### **Additional information concerning definitions of ingoing substances and impurities**

*Limit values:* The limit for excluded ingoing substances is 0 ppm (unless otherwise stated), while there's a specific defined limit for impurities. The impurity limit applies separately to each individual excluded substance, from each individual raw material. Concentrations of different impurities with the same excluded classification or substance group characteristics shall not be summed up to meet the impurity limit in the labelled product. Also, concentrations of an individual impurity, originating from different raw materials, shall not be summed.

*UVCB substances:* UVCB substances (Unknown or Variable composition, Complex reaction products or of Biological materials) have a composition of constituents that is not completely known or is variable from time to time. For UVCB substances, all constituents that are known must be declared in the Nordic Swan Ecolabel raw material appendix based on the best available knowledge. All constituents are considered individually and are subject to the chemical requirements, including for instance those on excluded substances and excluded classifications.

However, in the requirements O11 Long-term environmental effects, O12 Critical dilution volume (CDV) and O13 Surfactants – aerobically and anaerobically biodegradable, the UVCB substance can be considered as one ingoing substance and placed in a single row in the calculation sheet. If the UVCB substance can be assigned a DID-number, the data on the DID-list must be used. N.B. that for UVCBs that are perfumes, a specific approach applies regarding the requirement on environmentally hazardous substances, as described below.

*Perfumes:* Perfumes constitute a group of complex raw materials that are often, but not always, UVCBs. All perfume constituents must be declared the same way as described for UVCBs above. A perfume can also be placed in one row in the calculation sheet. However, for requirement O11 Long-term environment effect, a perfume must not be regarded as one ingoing substance, irrespective of whether the perfume is an UVCB or not. Instead, each constituent of the perfume mixture must be regarded in a calculation of the weighted sum of substances classified H410, H411 and H412. For perfumes, specific toxicity and biodegradability data can be used. If data is not available, the data on DID 2549 must be used.

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

O4 Certified raw materials from oil palms		Yes	No
Does the product contain renewable raw materials from palm oil or palm kernel oil, that are not RSPO certified (Identity Preserved, Segregated or Mass Balance)? This includes by-products, residues, and waste fractions from palm oil industries, such as palm fatty acid distillate and palm effluent sludge.	<input type="checkbox"/>	<input type="checkbox"/>	
Is the manufacturer of the hand dishwashing detergent RSPO Supply chain certified?  If yes, state the certificate/license number: _____	<input type="checkbox"/>	<input type="checkbox"/>	
O5 Classifications according to CLP Regulation (EC) 1272/2008			
Does the product contain ingoing substances or impurities classified with any of the hazard codes below? Incl. all classification variants. For example, H350 also covers classification H350i.	Yes	No	
H420 – Ozone	<input type="checkbox"/>	<input type="checkbox"/>	
H372 – STOT RE 1	<input type="checkbox"/>	<input type="checkbox"/>	
H334 – Resp. Sens. 1, 1A or 1BB	<input type="checkbox"/>	<input type="checkbox"/>	
H317 – Skin Sens. 1, 1A or 1B	<input type="checkbox"/>	<input type="checkbox"/>	
H350 – Carc 1A or 1B	<input type="checkbox"/>	<input type="checkbox"/>	
H351 – Carc 2	<input type="checkbox"/>	<input type="checkbox"/>	
H340 – Muta 1A or 1B	<input type="checkbox"/>	<input type="checkbox"/>	
H341 – Muta 2	<input type="checkbox"/>	<input type="checkbox"/>	
H360 – Repr 1A or 1B	<input type="checkbox"/>	<input type="checkbox"/>	
H361 – Repr 2	<input type="checkbox"/>	<input type="checkbox"/>	
H362 – Lact.	<input type="checkbox"/>	<input type="checkbox"/>	
EUH380 – ED HH 1	<input type="checkbox"/>	<input type="checkbox"/>	
EUH381 – ED HH 2	<input type="checkbox"/>	<input type="checkbox"/>	
EUH430 – ED ENV 1	<input type="checkbox"/>	<input type="checkbox"/>	
EUH431 – ED ENV 2	<input type="checkbox"/>	<input type="checkbox"/>	
EUH440 – PBT	<input type="checkbox"/>	<input type="checkbox"/>	
EUH441 – vPvB	<input type="checkbox"/>	<input type="checkbox"/>	
EUH450 – PMT	<input type="checkbox"/>	<input type="checkbox"/>	
EUH451 – vPvM	<input type="checkbox"/>	<input type="checkbox"/>	
O6 + O7: Excluded substances			
Does the product contain any of the following as ingoing substances or impurities?	Yes	No	
Alkylphenols (AP) (e.g. butylated hydroxy anisole (BHA, CAS No. 25013-16-5), butylated hydroxytoluene (BHT, CAS No. 128-37-0), alkylphenol ethoxylates (APEOs), and other alkylphenol derivates (APD)	<input type="checkbox"/>	<input type="checkbox"/>	
Amphoacetate derivatives of N-hydroxyethyl imidazolines (EC No. 271-792-5, 271-794-6, 931-291-0, 938-645-3, 942-589-5, 943-154-2, 944-415-3, 946-565-5, 947-998-2)	<input type="checkbox"/>	<input type="checkbox"/>	
Benzalkonium chloride, such as CAS No. 8001-54-5 and CAS No. 63449-41-2	<input type="checkbox"/>	<input type="checkbox"/>	
Bisphenols and bisphenol derivatives, defined as 34 bisphenols identified by ECHA for further EU regulatory risk management due to known or potential endocrine disruption reproductive toxicity.	<input type="checkbox"/>	<input type="checkbox"/>	

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Organic chlorine compounds, hypochlorites and hypochlorous acid	<input type="checkbox"/>	<input type="checkbox"/>
PBT and vPvB as defined in REACH Annex XIII, including those under ECHA PBT assessment <a href="https://echa.europa.eu/da/pbt">https://echa.europa.eu/da/pbt</a>	<input type="checkbox"/>	<input type="checkbox"/>
Per- and polyfluoroalkyl substances (PFAS) <i>PFAS is defined as any substance that contains at least one fully fluorinated methyl (CF<sub>3</sub>-) or methylene (-CF<sub>2</sub>-) carbon atom (without any H/Cl/Br/I attached to it)</i>	<input type="checkbox"/>	<input type="checkbox"/>
Phosphate, phosphonate, phosphonic acid and phosphoric acid	<input type="checkbox"/>	<input type="checkbox"/>
Potential or identified endocrine disruptors, listed in any of the following "Endocrine Disruptor Lists" List I, II and III	<input type="checkbox"/>	<input type="checkbox"/>
Quaternary ammonium compounds, that are not readily aerobic biodegradable such as DTDMAC (CAS No. 61789-80-8), DSDMAC (CAS No. 107-64-2), DHTDMAC (CAS No. 61789-72-8) and DADMAC (CAS No. 7398-69-8)	<input type="checkbox"/>	<input type="checkbox"/>
Substances on the REACH Candidate list of SVHC substances <a href="https://www.echa.europa.eu/candidate-list-table">https://www.echa.europa.eu/candidate-list-table</a>	<input type="checkbox"/>	<input type="checkbox"/>
<b>O8 Fragrance allergens</b>	<b>Yes</b>	<b>No</b>
Does the product contain fragrances (incl. plant extracts)? If yes, please answer the questions below	<input type="checkbox"/>	<input type="checkbox"/>
Have fragrances been added in line with IFRA guidelines? (IFRA, International Fragrance Association, <a href="http://www.ifraorg.org/">www.ifraorg.org/</a> )	<input type="checkbox"/>	<input type="checkbox"/>
Does the fragrance contain BHT? (see O7) If yes, please state the amount (ppm or % by weight): _____	<input type="checkbox"/>	<input type="checkbox"/>
Does the product contain fragrance allergens that are judged to be sensitising with the hazard statement H317 and/or H334, or which are listed in Annex III of the Cosmetic Regulation? If yes, please send in perfume specifications.	<input type="checkbox"/>	<input type="checkbox"/>
Does the product contain the fragrance allergens oak moss extract (Evernia prunastri, CAS No. 90028-68-5), tree moss extract (Evernia furfuracea, CAS 90028-67-4) or HICC (CAS No. 51414-25-6/31906-04-4)? If yes, please send in perfume specifications.	<input type="checkbox"/>	<input type="checkbox"/>
<b>O9 Preservatives</b>	<b>Yes</b>	<b>No</b>
Does the product contain preservatives?  If yes, please state name and log Kow/BCF: _____	<input type="checkbox"/>	<input type="checkbox"/>
<b>O11 Long-term environmental effects</b>	<b>Yes</b>	<b>No</b>
Does the product contain ingoing substances classified as environmentally hazardous with H410, H411 and H412? If yes, please state the amount (% by weight) per classification, and for H410 also state the M-factor: _____	<input type="checkbox"/>	<input type="checkbox"/>
<b>O15-O18 Packaging requirements</b>	<b>Yes</b>	<b>No</b>
Are all parts of the packaging compatible in regards of O15-O18?	<input type="checkbox"/>	<input type="checkbox"/>
If the closure contains silicone:  Is the closure used on a PET squeeze bottle? Does the packaging have a recyclability rate certificate by RecyClass with a score of minimum B?	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>
If mix-it-yourself products are sold with a spray bottle: Does the bottle have a permanent aerosol reducing foaming nozzle?	<input type="checkbox"/>	<input type="checkbox"/>
For fold-out (cross-over) labels of PP on PE containers: Does the label cover ≤ 60% of the packaging surface?	<input type="checkbox"/>	<input type="checkbox"/>
For labels on PET containers: Does the label cover > 60% of the packaging surface?	<input type="checkbox"/>	<input type="checkbox"/>
For packaging other than flexible plastic pouches and cardboard packaging for liquid products:	<input type="checkbox"/>	<input type="checkbox"/>

Is there any direct print on the container except for date codes, batch codes and UFI?		
For cardboard packaging for liquid products: Are any labels added, other than removable covers/labels on the closure added to indicate, that the product is not a food item?	<input type="checkbox"/>	<input type="checkbox"/>
Are labels printed internal at the production site, or by an external printing company (other than the label supplier)?	<input type="checkbox"/>	<input type="checkbox"/>
If yes, is the printing ink used for plastic packaging compliant with EuPIA exclusion policy*? * <a href="https://www.eupia.org/wp-content/uploads/2024/03/20240313-EuPIA_Exclusion_Policy_for_Printing_Inks_and_Related_Products_-March-2024_6th-Edition-v1-1.pdf">https://www.eupia.org/wp-content/uploads/2024/03/20240313-EuPIA_Exclusion_Policy_for_Printing_Inks_and_Related_Products_-March-2024_6th-Edition-v1-1.pdf</a>	<input type="checkbox"/>	<input type="checkbox"/>

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

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

<b>Place and date</b>	<b>Company name</b>
<b>Responsible person</b>	<b>Signature of responsible person</b>
<b>Telephone</b>	<b>Email</b>