# November CB Forum 2018 Agenda

**Location:** Avenue de Beaulieu 5, B-1160 Brussels, meeting room C

**Date:** November 20, 2018

**Time:** 9:30 – 17:30

## Welcome

1. **9:30 CHAIR**
   
   Tour de table, adoption of the agenda and June 2018 CB Forum Minutes and AOB requests

## Indoor cleaning services

1. **10:00 BE**
   
   Questions on the implementation of criterion M1

2. **10:30 IT**
   
   Discussions on the use of disinfectants

3. **10:40 IT**
   
   Discussion on presence of sub-divisions and subsidiaries (implications for accounting records, names, legal contractors)

4. **10:50 IT**
   
   Mistake in the wording of criterion O2

5. **11:00 EC**
   
   Discussion on Cleaning Services fees

### Coffee break - 15min (11:15)

## Lubricants

1. **11:30 FR**
   
   Discussion on the new lubricants Decision

## Printed / converted paper

1. **11:45 JRC / DK**
   
   Open discussion on printed / converted paper: in view of the 1st AHWG in December

## Detergents

1. **12:30 EC**
   
   EC updates on ongoing amendments and updated UM

## Absorbent hygiene products

1. **12:45 DE**
   
   Question on the social aspects of absorbent hygiene products

2. **13:05 EC**
   
   Discussion of criterion 6.5 Silicone

### Lunch break – 1 hour (13:25)

## Communication

1. **14:25 IT / EC / HD**
   
   ECAT: Updates on the timeline and BREXIT implications

2. **14:35 HD**
   
   Questions on logo guidelines
<table>
<thead>
<tr>
<th>Time</th>
<th>Country</th>
<th>Note</th>
</tr>
</thead>
<tbody>
<tr>
<td>14:50</td>
<td>FI</td>
<td>Feedback from LHs: creation of a customer feedback form?</td>
</tr>
<tr>
<td>15:05</td>
<td>EC / HD</td>
<td>Toolkit strategy: Results of CB survey and CB tour de table on the 2019 strategy</td>
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<tr>
<td>15:50</td>
<td>EC / HD</td>
<td>September 2018 statistics and fees exercise</td>
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<tr>
<td>15:55</td>
<td>DK</td>
<td>Presentation of Denmark inspection procedures</td>
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<td><strong>Coffee break – 15 minutes (16:15)</strong></td>
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<tr>
<td>16:30</td>
<td>Chair</td>
<td>Summary of past and on-going Virtual CB Forum discussions</td>
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<td>16:40</td>
<td>DK</td>
<td>Hard surface cleaning products: Cleaning machine criteria</td>
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<tr>
<td>16:55</td>
<td>DE</td>
<td>Follow up points from June CB Forum 2018</td>
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<tr>
<td>17:15</td>
<td>Chair</td>
<td>AOB points &amp; wrap up</td>
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Annexes

2. Indoor cleaning services

2.a BE Questions on the implementation of criterion M1

**Question 1: M1 and O1: Use of cleaning products with low environmental impact**

- “Part A: At least 50 % by volume at purchase of all cleaning products used per year, excluding wet wipes, other pre-moistened products and products used for the impregnation and conservation of mops (during the laundry process), shall have been awarded the EU Ecolabel for hard surface cleaning products in accordance with Commission Decision (EU) 2017/1217 (2) or another EN ISO 14024 type I ecolabel that is nationally or regionally officially recognised in the Member States.”

- How should we understand “of all cleaning products used”? Should we calculate the 50% on the green group or the purple group?

- Which products used should comply with criterion M1b? 2 and 4 or also 3?

- If 3 and 4 also have to comply; how do we implement M1b: what do we do for example with a wood cleaner and the VOC limits from criterion 4 which only sets limits for specific cleaners? No limit applicable

VOCs shall not be present above the limits specified below (VOCs means any organic compound having a boiling point lower than 150 °C).

<table>
<thead>
<tr>
<th>Product type</th>
<th>VOC limit</th>
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</thead>
<tbody>
<tr>
<td>All-purpose cleaners, RTU</td>
<td>30 g/l of RTU product</td>
</tr>
<tr>
<td>All-purpose cleaners, undiluted</td>
<td>30 g/l of cleaning solution</td>
</tr>
<tr>
<td>Kitchen cleaners, RTU</td>
<td>60 g/l of RTU product</td>
</tr>
<tr>
<td>Kitchen cleaners, undiluted</td>
<td>60 g/l of cleaning solution</td>
</tr>
<tr>
<td>Window cleaners, RTU</td>
<td>100 g/l of RTU product</td>
</tr>
<tr>
<td>Window cleaners, undiluted</td>
<td>100 g/l of cleaning solution</td>
</tr>
<tr>
<td>Sanitary cleaners, RTU</td>
<td>60 g/l of RTU product</td>
</tr>
<tr>
<td>Sanitary cleaners, undiluted</td>
<td>60 g/l of cleaning solution</td>
</tr>
</tbody>
</table>
• What do we do with vinegar? It is not a mix, do we consider it as a cleaning products (maybe box 4) or does it fall out of the scope of criterion M1 like osmotic water?

Question 2: Criterion M3 and O3 Microfiber products:

• According to a big Belgian distributor of professional cleaning supplies in Belgium cloth’s and especially mops are often a mix of microfibers with another fibre and are not made for 100% out of microfiber. The other fibres bring additional properties to the product such as: making it is easier to move the mop over the floor (ergonomic) or making it more durable. The percentage of microfibers is not specified in the criteria hence we propose all products with microfibers shall be accepted for criteria M3 and O3. The Nordic Ecolabel also no longer requests a minimal microfiber content: this is explained in the background document of the Nordic Ecolabel for microfiber based cleaning supplies: https://www.nordic-ecolabel.org/product-groups/group/?productGroupCode=083
**Question 3: Criterion 011 Ecolabel services and other ecolabelled products**

**Criterion O11 — Ecolabelled services and other ecolabelled products (up to 5 points)**

This criterion applies to the use of ecolabelled services and/or products, defined as services and/or products that are not directly used in the provision of EU Ecolabel indoor cleaning services but are used to support the everyday business operations of the applicant that refer to the EU Ecolabel indoor cleaning services provided. These can include but are not limited to services (e.g. laundry and car washing) outsourced by the applicant to a third party. They can cover products such as laundry detergents, dishwasher detergents or copying paper.

O11 (a) Ecolabelled services (up to 2 points)

100% of a service type is outsourced to a provider that has been awarded the EU Ecolabel or another EN ISO 14024 type I ecolabel that is nationally or regionally officially recognised in the Member States for that service (1 point for each service, up to a maximum of 2 points in total)

O11 (b) Ecolabelled products (up to 3 points)

100% of product units of a product group have been awarded the EU Ecolabel or other EN ISO 14024 type I ecolabel that is nationally or regionally officially recognised in the Member States (0.5 point for each product group, up to a maximum of 3 points total)

*Note: Ecolabelled products as cloths and mops, and consumable goods supplied as part of a contract to clients fall outside the scope of this criterion. For this sub-criterion, a 'product group' is considered to be as defined by EU Ecolabel criteria or other ISO type I label criteria (e.g. 'paper products', 'laundry detergents', 'textiles').*

- “products and services used to support the everyday business operations of the applicant”
  Examples given: laundry detergent, dishwasher detergent or copying paper

- What is “used to support everyday business operations”? How direct should the link be with the cleaning?
  Should we award a point if:
  - All their beamers all have the blue angel?
  - If their compost bin has the Nordic Ecolabel?
  - If the candles at the reception are EU ecolabel?

- It is written it should be “100% of a product group” (quite unrealistic and unscientific as the scope of a PG can be very broad (converted paper products) or very narrow (hand dish washing detergent)) and also seems to be in conflict with the examples given above “laundry detergent” should in that case also include the stain removers used.

- Should we give 0,5 points if 100% of the laundry detergent used is ecolabel or should also the stain removers be EU ecolabel to be eligible for the 0,5 points

- Does this mean in practice no points can be gained for the use of converted paper products such as envelopes because the scope is very broad and cannot be fully reached in practice.

- What if the scope of the EU Ecolabel if different from the other labels, which scope should we use to determine 100%?
2.b IT Discussions on the use of disinfectants

*Question 1:* Wouldn’t it be wise to check the frequency of use and the names of the disinfectants that are used by the ecolabelled service even if disinfectants are excluded from the scope?

2.c IT Discussion on presence of sub-divisions and subsidiaries (implications for accounting records, names, legal contractors)

*Question 1:* In the past CB forum it was decided that the indoor cleaning services covered by the EU Ecolabel are provided by a sub-division, a subsidiary, a branch or a department of the operator clearly independent from the company (whereas the company provides other services). we are wondering whether it is sufficient that the sub-division keeps separate accounting records or it has to be a legal entity (ex. Ltd).

*Question 2:* If the department is not a legal entity, this means that the contract is registered to the company FOR the Department X, correct?

*Question 3:* Usually in the certificate we copy the names of the certified product or the services. In this case, the certificate is again named to the company (that is the legal entity) FOR the department X, not naming the single sites (otherwise the certificate would have to be dynamic, which is hard to do)

2.d IT Mistake in the wording of criterion O2

*Question 1:* Criterion O2: we believe there is a mistake in the wording of the text: the dilution must be MAX 1:100 and not MIN. this way the text would be coherent with what was decided in the past CB Forum (less than 10 mL into 1L); consequently, the excel file should be changed.

2.e EC Discussion on Cleaning Services fees

*Question from EC:* How do CBs intend to apply the fees to this new product group? Will it be the same as for the TAs?

3. Lubricants

3. FR Discussion on the new lubricants Decision

Discussion time for the new decision on lubricants which are to be published soon. Please find below questions and points that FR would like to discuss:
New Lubricant Substance Classification list (LuSC-list)

- What is the date of availability? Where can we find the terms of use, in the User Manual?

Criterion 4a: Origin, traceability and advertising of renewable ingredients

- We need a list of equivalence for the RSPO scheme

Criterion 6 – Minimum technical performance

- To comply with the criteria 6 / Applicant’s client’s approval: if the applicant sends to CB internal test reports and the technical sheet of the product which states the good quality of the product and functionality, will it fit the criteria?

4. Printed / converted paper

4. DK / JRC  Open discussion on printed / converted paper: in view of the 1st AHWG in December

DK suggests that the CBs provide input on any difficulties they might have with printed and converted paper criteria, and if they have any requirements should be reworded. Together with the JRC, ideas will be discussed on the revision and on which requirements should be changed.

**CBs with active licenses in this product group are invited to provide main hotspots or issues and problems on which to concentrate the revision.**

Feedback from CBs on the possibility to merge the two product groups in one single Decision (1act +1 annex) is also welcome and will be discussed.
6. Absorbent hygiene products

6.a DE Question on the social aspects of Absorbent Hygiene Products

The criterion reads as follow. “Applicants shall ensure that the fundamental principles and rights at work as described in the international labour organizations (ILO) core labour standards, the UN global compact and the OECD guidelines for multinational enterprises shall be observed by production sites along the supply chain used to manufacture the license products…”

Assessment and verification: the applicant shall demonstrate third party verification of compliance using independent verification or documentary evidence including site visits by auditors during the ecolabel verification process for production sites in the supply chain for the licensed product.

**Question 1:** Which company has to do the verification proof? The production side where all products labelled with the Ecolabel are produced or all production sites along the supply chain?

**Question 2:** In the user manual we have the following standards as verification proof: ISO 26000 human rights and label practice components, social Accountability 8000 (SA 8000); ethical trading initiative (ET). Which verification proof could be accepted differently especially in EU member state such as in Italy, Switzerland, Austria, Germany, Sweden or Finland?

**Question 3:** Do you think it might be possible that we accept self-declarations?

6.b EC Discussion on criterion 6.5 Silicone

EC requests a discussion on criterion 6.5 Silicone.

**Question from EC:** How do CBs assess this criterion?

Rationale: we received a complaint from a producer saying that the 100-ppm limit for D4 and D5 impurities is too low and not in line with values proposed by Nordic Swan and Blue Angel for the same criterion:

1) EU ECOLABEL (AHP) > year 2014 > Criterion 6.5 (D4 and D5 <100 ppm in the silicone) >> A&V: declaration from the supplier
2) NORDIC SWAN (Sanitary Products) > year 2016 > Criterion O6 (D4 and D5 <800 ppm in the finished product=silicone emulsion’s coating bath)
3) BLUE ANGEL (Disposable nappies) > year 2018 > Criterion 3.5.6 (D4 and D5 <800 ppm of the adhesive strip)

**EC wants to know from CBs who awarded licenses for this PG if they could easily fulfil the 100-ppm requisite.**

CBs with licences for AHP are requested to inform how they managed to fulfil this requirement 6.5 Silicone: CZ, DK, FI, FR, RO, SE
7. Communication

7.a  IT/EC/HD  ECAT: Updates on the timeline and BREXIT implications

The HD and IT Team will provide an update on the timeline for the deployment of the new ECAT_Admin. Furthermore, the following implications of BREXIT on ECAT and the website will be addressed:

- ECAT access rights will be removed for the UK CB and all UK licence holders that have not arranged a transfer to another CB, all UK licences will be cancelled, the UK contacts will be removed from the website, and the UK licences will no longer appear on the statistics.
- The HD has started tracking all BREXIT-related questions and EC-validated answers (ECAT & non-ECAT related). CBs that have questions regarding how to respond to BREXIT-related questions should contact the HD/EC.

7.b  HD  Questions on logo guidelines

**Question 1 from FR:**
- There may be a glitch in the modifiable Adobe Illustrator file of the EU Ecolabel logo as the colour codes do not appear properly. Furthermore, companies that have tried to recreate the logo colours (by using the colour codes within the Regulation) have generated shades of blue and green that are much different than the current logo colours. The HD and the EC are looking into how to resolve the issue.

**Question 2 from FR:**
- EC feedback is requested on whether the EC still plans on providing translated versions of the logo guidelines.

**Question 3 from PT:**
- Is it possible for the EU Ecolabel logo to be placed on a gradient background, as shown in the example below?

<table>
<thead>
<tr>
<th>Black or white on a coloured background (not patterned).</th>
<th>Patterned coloured background.</th>
<th>One colour gradient background</th>
<th>Black or white on a coloured background (one colour gradient/not a pattern).</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Solid color</strong> - This is possible because it is a solid color.</td>
<td><strong>A pattern</strong> - Not possible</td>
<td><strong>One colour gradient /not a pattern</strong></td>
<td>Example with the red coulor</td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>One colour gradient - Ex.: one coulor (red) with a gradient of red (Is it possible?</strong></td>
<td>A spot of colour around or behind the monochrome logo</td>
</tr>
</tbody>
</table>
Feedback from LHs: creation of a customer feedback form?

FI proposes to discuss on the implementation of a system for collecting feedback from license holders and develop a common customer feedback form. Other CBs are requested to present their customer satisfaction formats, if in use, which aspects are they dealing with, and if they are sent also to investigate the reasons that lead a licence holder to withdraw from the EU Ecolabel.

Toolkit strategy: Results of CB survey and CB tour de table on the 2019 strategy

All CBs are asked to please complete the following short survey in order to gather preliminary reactions about the toolkit strategy: [https://www.surveymonkey.co.uk/r/DPYDD36](https://www.surveymonkey.co.uk/r/DPYDD36)

At the CB Forum, the HD will give an update on the toolkit strategy with an objective to:
- provide an overview to CBs on the content and download statistics of the completed toolkits
- present the results of the CB survey (see above link)
- gather real-time input from CBs regarding the toolkit strategy’s relevance and utility.

Presentation of Denmark inspection procedures

DK will be presenting the report found in the link below (in English) and make some general conclusions: [https://www.ecolabel.dk/en/about/inspection-activities](https://www.ecolabel.dk/en/about/inspection-activities).

Hard Surface Cleaning Products: cleaning machine criteria

DK has been approached by producers of a technology used for cleaning for the hard surface cleaning products. The cleaning machine is making hypochlorite on-site which is used as a cleaning agent. The hypochlorite is made of water and NaCl. DK did not accept this technology for several reasons and wants to ensure that no other CB will accept this if approached by the same company.

Follow up points from June CB Forum 2018

(Point 2.g from June 2018 CB Forum: (DE) Follow up on book and claim verifications)

DE will present an update on the recommendations for book and claim verifications.
Refer to point 2.g in the June 2018 CB Forum for more information:

Discussion on the criteria for the 6 detergent and rinse-off PGs regarding the criteria for sustainable sourcing of palm oil, palm kernel oil and their derivatives (with an RSPO expert).

Point 2h: from June 2018 CB Forum (DE) Update on detergents/RoC (fragrances) related with Q: N9
DE will provide an update on the discussions it had with the EC.