

Consultation response document for

Supplies for microfibre based cleaning



Version 3

14 November 2022

Nordic Ecolabelling of Supplies for microfibre based cleaning –
Consultation response document

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1 Summary

The criteria focus on circular economy and environmental requirements, i.e., by setting requirements for:

- Cleaning performance without the use of cleaning chemicals.
- Durability of the products.
- Test for loss of fibre fragments (e.g., microplastic).
- Minimum amount of recycled or bio-based materials in polyester fibres.
- Renewable resources shall comply with specific environmental requirements.
- Meet strict environmental and health requirements for chemicals used in textile manufacturing.

The consultation for Supplies for microfibre based cleaning was conducted in all the Nordic countries in the period 27th of April to 26th of June 2022.

A total of 28 consultation comments were received. Most comments were given to the requirements/topics regarding:

- General regarding that the criteria are too extensive and resource demanding
- O5 Recycled fibres/raw materials: Test for environmentally harmful substances
- O7 Polyamide
- O8 Polyester
- O27 Implementation of Best Available Techniques (BAT) for energy and water consumption
- O41 Dimensional changes after washing and drying
- O43 Durability
- O48 Loss of fibre fragments

General regarding that the criteria are too extensive and resource demanding:

Most of the comments were regarding that the criteria are too comprehensive and resource demanding (both work and costs) for small and medium-sized companies.

Follow up after consultation:

After the consultation O5, O8, and O43 were adjusted, and the requirement levels were lowered. O27 was deleted. Hereby, the criteria have become less comprehensive and resource demanding, but still have strict environmental requirements.

O5 Recycled fibres/raw materials: Test for environmentally harmful substances:

Most of the comments were regarding which test method should be used, third-party certification (Oeko-Tex standard 100) and cost.

Follow up after consultation:

After the consultation the numbers of substances that must be tested for were lowered and the test methods was written in the requirement (instead of referring to methods in Oeko-Tex). In the comments from Nordic Ecolabelling below in this document, it is also explained that Oeko-Tex standard 100 class II certification is an alternative possibility to testing.

O7 Polyamide:

Most of the comments were regarding that it is difficult for get recycled polyamide.

Follow up after consultation:

The requirements have not been changed. But in the comments from Nordic Ecolabelling below in this document, it is explained that there are in fact two

alternatives to meet the requirement. One possibility is to use minimum 20% recycled polyamide. Or alternatively use the second possibility that is requirements to the emissions of N₂O during monomer production.

O8 Polyester:

Most of the comments were regarding concern about having access to sufficient quantities of recycled materials. For some in addition also have concern about cost and quality of the products.

Follow up after consultation:

After the consultation the amount of minimum recycled polyester was lowered from 30% to 25%. Polyester is the type of plastic with the best availability of recycled material. Based on this, it is considered reasonable and appropriate that the Nordic Ecolabel requires minimum 25% recycled polyester.

O27 Implementation of Best Available Techniques (BAT) for energy and water consumption:

Different comments regarding e.g., that information about energy consumption is hard to get from production factories and difficult to influence a change in the technologies used at factories.

Follow up after consultation:

After the consultation the requirement was deleted. It was decided that this requirement was one place to make the criteria less extensive and resource demanding.

O41 Dimensional changes after washing and drying:

Different comments regarding e.g., product types that the requirement applies for, level of dimensional changes and information to the customer.

Follow up after consultation:

After the consultation the requirement was changed so it now applies for all products. In addition, information to the customer about dimensional changes is now deleted.

O43 Durability

Most comments were regarding the increase from 50/10 washes (professional products/domestic products) to 500/200 washes is to cost and time consuming. There were also concerns about the combination of increased requirements to quality and the new requirement to minimum amount of recycled polyester fibres.

Follow up after consultation:

After the consultation the requirement level were lowered 300/100 washes (professional products/domestic products).

O48 Loss of fibre fragments:

Most comments were regarding that the test methods are not specifically adapted for cleaning textiles, and several suggest that the test method developed by Weber & Leucht should be used instead.

Follow up after consultation:

After the consultation the requirement was changed to the test method developed by Weber & Leucht and a minimum rating according to Weber & Leucht's rating scale was set.

2 About the consultation

The consultation for Supplies for microfibre based cleaning was conducted in all the Nordic countries in the period 27th of April to 26th of June 2022. A total of 28 consultation comments were received.

This document consists of feedback received during the public consultation for revised criteria for Supplies for microfibre based cleaning, 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.

The main changes proposed in the revision are as follows:

- Requirements for textiles regarding proportion of recycled material, renewable material, or manufacturing.
- Stricter and new requirements for chemicals.
- New requirement for energy and water consumption during textile production.
- New requirement for durability of the products.
- New requirement for test of loss of fibre fragments during washing.
- New requirement for annual control of suppliers.
- New requirement for labour rights in textile production.

3 Compilation of incoming comments and feedback

A total of 28 consultation comments were received. The distribution of comments can be seen in the tables below.

Table 1: Overview of comments

Country	A. Just commenting	B. Supports the proposal	C. Supports the proposal with comments	D. Refrains from commenting	E. Rejects the proposal with justification	Total
Denmark	4		1	2		7
Sweden	5	1	3	2	6	17
Finland			1			1
Norway		2	1			3
Iceland						0
Total	9	3	6	4	6	28

Table 2: Overview of respondents from Denmark

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
Dansk Erhverv	x				
Asli	x				
Chamlon	x				
Danske Regioner				x	
Fagbevægelsens Hovedorganisation				x	
Miljøministeriet			x		
Vikan	x				
Total	4		1	2	

Table 3: Overview of respondents from Sweden

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
Avet					x
Boverket				x	
Concept Manufacturing	x				
Ecolab Deutschland	x				
Klimabolaget	x				
Nordexia	x				
Procurator			x		
Rezi Microfaserprodukter					x
Smart Microfiber Systems					x
Stockholm Stägross			x		
Svenskt Vattens				x	
Upphandlingsmyndigheten			x		
Weber & Leucht					x
Wecovi					x
Vikur Sverige		x			
Pfennig Reinigungstechnik					x
Essity Hygiene and Health	x				
Total	5	1	3	2	6

Table 4: Overview of respondents from Finland

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
Vileda Professional / Freudenberg			x		
Total			1		

Table 5: Overview of respondents from Norway

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
Agilia		x			
Coor Service Management		x			
The Microfibre Consortium			x		
Total		2	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 requirement numbers in the consultation draft of the criteria. Nordic Ecolabelling has given a response to the comments and described if the requirement has been adjusted.

4.1 General comments

Procurator

Tack för er förfrågan om synpunkter. Först vill vi säga att vi uppskattar ert arbete med att säkra upp kvalitet och hållbarhet på en annars känslig produktgrupp. Vi har stämt av med våra leverantörer och de ser inga större problem att hantera de nya krav som kommer ställas på dem. Merparten möter de redan i sin nuvarande verksamhet.

De kommentarer vi fått rör förändringen av råmaterial och deras producenter

1. Utan att ta hänsyn till innevarande lager och befintliga produktionsanläggningar av dagens råvaror skulle man uppskatta en tid på 3-5 år då de gamla reglerna fortfarande är gällande för att i god tid kunna ställa om till nya råvaror och råvaruleverantörer. En direkt applicering av nya regler skulle riskera belasta råvaruleverantörerna och eventuellt skapa en materialbrist.
2. Fler tester av produkterna kommer öka kostnaden på slutprodukten till konsument. Normalt är detta inget att ta hänsyn till då det blir till resultat av en förbättring av kvalitet och miljö men i dagsläget med en redan skenande inflation kan det vara värt att ta till övervägande.
3. En förflyttning mot återvunnen råvara kan skapa brist på marknaden. Utöver dålig tillgång på svanenmärka slutprodukter i återvunnet material skulle även detta ge ökade kostnader med samma resultat som i ovan punkt nr 2.

Comments from Nordic Ecolabelling

Tak for jeres input.

Vedr. punkt 1:

Der er altid minimum ét års overlap imellem en ny og en gammel generation af kriterierne, dvs. at man som licenshaver har minimum ét år til at leve op til krav, indsamle dokumentation, ansøge og får godkendt ansøgningen. Desuden produkter, som er produceret imens man har licens til generation 2, kan sælges fra lager med Swanemærket efter at generation 2 er udløbet, dog kun i en rimelige tidsperiode (typisk op til et halvt år efter udløb af generation).

Vedr. punkt 2:

Nordisk Miljømærkning har forståelse for påvirkningerne fra situationen som verden stå i lige nu. Generation 2 af kriterierne er fra 2010 og hermed en del år gamle, hvilket gør at en del krav kræver opdatering. Men vi har forståelse for omkostninger til test og har bl.a. derfor efter høringen justeret krav O43 Durability hvor antallet af vaske er blevet sænket, krav O5 Recycled fibres/raw materials: Test for environmentally harmful substances hvor antallet af stoffer, som der skal testes for er blevet sænket og krav O27 BAT er blevet slettet.

Vedr. punkt 3:

Se venligst ovenstående punkt 2 samt svar under O8 Polyester.

Avet

Thanks for initiating a new process in the microfibre textiles. For us they are going to much and too far. Creating a lot of extra work and extra costs. Furthermore, we are very disappointed that dry impregnated cleaning textiles as for more than 10 years very successfully and ecologically in use are not even being considered. In practice we do not see any reason that also cleaning tools must be under the process. This represents no practical nor ecological or economical approach.

To be very clear except in the Nordic countries, the Nordic Swan label has no meaning for the customers. Eventually a little bit in Switzerland as AVET promoted the label very much in the past years for its ClaraClean textiles. In our main markets Italy and France EU-Ecolabel and ECOCERT have the real position for tenders etc. About Nordic Swan, sorry, nobody really cares.

If the Nordic Swan goes in the direction of this paper, we will strongly take into consideration to give up this licence in the future.

To avoid this and get on in a reasonable and practicable way we as certificate holder Nr. 3083 0015 strongly and fully support the comments V.2.1. NE-Micro of Weber & Leucht.

Only if the requirements as stipulated by Weber & Leucht can be met we will for sure continue the cooperation with Nordic Ecolabel.

Comments from Nordic Ecolabelling

Thank you for your input.

Regarding dry impregnated cleaning textiles: The main reason that Nordic Ecolabelling in the first place developed criteria for Supplies for microfibre based cleaning is the unique property of very effective cleaning without the use of chemicals of microfibre cleaning products. We therefore see the use of applied chemicals to the finished microfibre products as an unnecessary environmental impact.

Regarding cleaning tools: A cleaning tool can only be labelled if it is sold together with a labelled microfibre product and that the microfibre product is to be attached to the tool. Hereby it is possible to label a package containing labelled microfibre product and tool. In the criteria there are environmental requirements to the tool regarding recycled contents, chemicals and ability to recycle materials.

Regarding the knowledge of the Nordic Swan Ecolabel: The Nordic Swan Ecolabel is the official ecolabel in the Nordic countries and has a very high knowledge the Nordic countries. Outside the Nordic countries the knowledge of the Nordic Swan Ecolabel is much lower, which is probably quit naturally, especially if the country has another ecolabel that is widely used.

Regarding comments from Weber & Leucht: Please see below in this chapter and under O5, O7, O8, O10, O41, O43, O44, O45, O48 and appendix 5.

Concept Manufacturing

The new version will be more environment oriented, that is a point I agree with. Now I have no big comments, I understand that point. What I hope is to get all the information from my manufacturer. I know that everything is done in the good way.

All the « background to requirement » helps to understand better why you ask so detail. It's really helpful.

Comments from Nordic Ecolabelling

Thank you for your input.

Rezi Microfaserprodukte

We have also consulted with Mr. Thomas Leucht from Application Lab Weber & Leucht on this proposal 3.0. He has already sent you a more detailed, but not yet final, feedback. We fully support his comments and proposals from the point of view of an SME with its own production and wholesale (that's why we also attach the comments of Mr. Thomas Leucht).

It is not possible for a SME with the current technological status and financial resources to support and implement the present proposal 3.0. We are also very critical of the trends outlined in the proposal.

If this Draft is implemented in the present version, we will unfortunately not be able to certify further products with the Nordic Swan Ecolabel. We will then unfortunately be forced to switch to other European labels or certificates.

We are convinced of the efforts and long-term objectives of the label. With this Draft, however, good developments and objectives for companies as Rezi (= SME's) are destroyed.

Comments from Nordic Ecolabelling

Thank you for your input.

Generation 2 of the criteria is from 2010 and hereby quite a few years old, which means that several requirements require updating and new requirements are needed in order to assure that the Nordic Swan Criteria to point out the environmentally best microfibre products. We understand that the new criteria are more demanding, however after the consultation several requirements have been adjusted e.g., requirement O43 Durability where the number of washes has been lowered, requirement O5 Recycled fibres/raw materials: Test for environmentally harmful

substances where the number of substances to be tested has been lowered and O27 BAT has been deleted.

Regarding comments from Weber & Leucht: Please see below in this chapter and under O5, O7, O8, O10, O41, O43, O44, O45, O48 and appendix 5.

Stockholm Städgross

Vi håller på att diskutera med vår tillverkare. Det mesta är möjligt. Problemet som vår tillverkare ser det, är att det är svårt eller kan bli svårt att få tag på tillräckligt med återvunnet material just nu.

Tex PET plast för att göra polyester och polyamid. Kriget har också ställt till en hel del problem med tillgång till material.

Vi tycker att det är bra att kriterierna utvecklas och att det ställs tydligare krav.

Vi skulle säga att detta kan vara möjligt att införa nya kriterier om ca 2 år. Just nu är det väldigt ostabilt på marknaden med tillgång till råvaror överhuvudtaget. Det gör att man inte kan planera på samma sätt för att få tag på råvaror. Speciellt återvunnet material.

Det är en utmaning just nu är att få tag på tillräckligt mycket återvunnet material. Det är framförallt dom stora klädföretagen som tar det mesta. Och blir det något över så kan dom köpa det som finns.

Comments from Nordic Ecolabelling

Tak for jeres input.

Vedr. tilgang til recirkuleret materiale til polyester og polyamid se venligst under O7 og O8.

Vedr. polyamid være venligst opmærksom på at der i krav O7 er et alternativ til recirkuleret materiale, hvor der i stedet for er krav til N₂O-emissioner under monomer-produktionen.

Vedr. overgangsperiode så er der altid minimum ét års overlap imellem en ny og en gammel generation af kriterierne, dvs. at man som licenshaver har minimum ét år til at leve op til krav, indsamle dokumentation, ansøge og får godkendt ansøgningen. Desuden produkter, som er produceret imens man har licens til generation 2, kan sælges fra lager med Svanemærket efter at generation 2 er udløbet, dog kun i en rimelige tidsperiode (typisk op til et halvt år efter udløb af generation).

Weber & Leucht

Comment:

Application Lab Weber & Leucht supports the interests of nordic swan ecolabel and the certificate holders for 15 years. We welcome the modernization of the currently only available and specific certification standard for cleaning textiles. The submitted draft version shows that has been intensively dealt with the topic of circular economy, sustainability and ecodesign and contains a lot of useful information, which will be increasingly important in the future. This comment reflects the view of our lab as well as many of our clients holding a current license. The most companies in the target of cleaning textiles are small and midsized enterprises (SME) focused on

innovative products. The new criteria catalogue is so huge, that many companies could fail because of this high burden, as the time to implement all criteria is too short and cost-intensive. Please don't forget, that the standard was established by SME's. It would therefore be a great pity if the many new criteria lead to the fact that SME's would have to give up certification already granted.

Proposal:

The catalogue of criteria should avoid additional work and costs as far as possible. References to new standards and certifications should only be made if they are directly applicable to cleaning textiles and have already proven themselves (e.g., published standards with scope of cleaning textiles. Third party certification should only be mentioned if they transparently refer to fully published standards and are therefore also accessible to companies and accredited testing laboratories (as example ISO, EN standards). The document also contains terminology and background information that can be assigned to the area of the circular economy, but CEN/TC 248 WG 39 is only just working on this topic in detail. Criteria should only be included when the first published standards are available. It is therefore requested to postpone all requirements still under development (not state of the art) to the next revision.

Comments from Nordic Ecolabelling

Thank you for your input.

Generation 2 of the criteria is from 2010 and hereby quite a few years old, which means that several requirements require updating and new requirements are needed. We understand that the new criteria are more demanding, however after the consultation several requirements have been adjusted e.g., requirement O43 Durability where the number of washes has been lowered, O5 Recycled fibres/raw materials: Test for environmentally harmful substances where the number of substances to be tested has been lowered and O27 BAT has been deleted

In cases where there exist relevant ISO international standards or/and EN European standards for testing then these are required in the criteria.

Regarding CEN/TC 248 WG 39 it will probably take several years before it is ready to be published. Because the criteria for Supplies for microfibre based cleaning is quite old and need updating it is not possible for Nordic Ecolabelling to wait several years for CEN/TC 248 WG 39. Nordic Ecolabelling is following the development of circular economy and environmental issues in the textile section and are setting requirements based on that. When CEN/TC 248 WG 39 is finished, and published Nordic Ecolabelling will assess it in connection with revision of relevant Nordic Swan Ecolabel criteria.

Please also see under O5, O7, O8, O10, O41, O43, O44, O45 and O48.

Wecovi

Overall opinion:

We very much encourage the desire of Nordic Ecolabelling to renew the criteria for 083 and make it stricter and more sustainable. After 14 years it is time for fresh criteria, and we are very happy with all the research Nordic Ecolabelling has been doing and the fact that Wecovi can give feedback on this consultation.

Our general conclusion after reading the consultation was: doubt. However much we follow the Nordic Ecolabelling vision, the addition and modification of certain criteria will have a major impact on the time and effort of licensees. Criteria such as O27 BAT, O43 Durability, O51 Labour rights - that we very much understand and encourage - are time- and cost consuming for the licensee and its (sub) contractors. We are not sure, if Wecovi would be able to put in that time and (yearly) effort and if the commercial importance of the Nordic Ecolabel would remain applicable. The ignorance we have about the next steps increases the feeling of doubt. Speaking of these next steps, could these questions be clarified?

1. What happens with all currently licensed products of all licensees?
We see that the 2.6 criteria are valid until 29 February 2023. What is the time path after this moment?
2. Specifically, what happens when currently licensed products do not meet the new criteria?
3. Specifically, what costs are involved in this renewal process?

Extra consideration:

We will give criteria specific feedback on the next page. First, we would like to give this extra consideration. It is repeatedly stated that 'Microfibre cloths and mops are effective without the use of cleaning chemicals' (ref. page 4, first line of the Summary). This is the number 1 sustainability product characteristic of microfibres. We feel like there should be more focus on that major fact. It is, unfortunately, still common practice in our market that microfibre products are being used with cleaning chemicals or even sold and advised to do so. Even by licensees! Next to the harmful effects on our environment, using chemicals blocks the powerful cleaning performance of microfibres. There is a role for Nordic Ecolabelling to regulate this.

Comments from Nordic Ecolabelling

Thank you for your input.

We understand that the new criteria are more demanding, however after the consultation several requirements have been adjusted e.g., requirement O43 Durability where the number of washes has been lowered, requirement O5 Recycled fibres/raw materials: Test for environmentally harmful substances where the number of substances to be tested has been lowered and O27 BAT has been deleted. Requirement O51 Labour rights is important because microfibre cleaning products are often produced in countries where working conditions can be problematic, but after the consultation the requirement has been changed now focus on due diligence and independent third-party on-site audit of the manufacturing site.

Regarding renewal of licensed products:

The current generation 2 of the criteria is valid until 29th of February 2024. There is always a minimum of one year overlap between a new and an old generation of the criteria, which means that you as a licensee have a minimum of one year to live up to the requirements, collect documentation, apply, and have the application approved. In addition, products that are produced while licensed for generation 2 can be sold from stock with the Nordic Ecolabel after generation 2 has expired, but only for a reasonable period of time (typically up to six months after the end of the generation). Regarding fees please see homepage here [Group | Nordic Ecolabel \(nordic-ecolabel.org\)](https://www.nordic-ecolabel.org) (it for generation 2 until generation 3 is published).

Regarding cleaning chemicals:

The main reason that Nordic Ecolabelling in the first place developed criteria for Supplies for microfibre based cleaning is the unique property of very effective cleaning without the use of chemicals of microfibre cleaning products.

In this generation it is clearly stated in the quality tests in recruitment O44 Removal of dust and dirt and O45 Assessment of hygienic conditions that no cleaning chemicals must be used when testing. Hereby, it must be documented that the products have a high cleaning ability without the use of cleaning chemicals.

In addition, in requirement O49 Instructions the customer must be informed on the correct use without cleaning chemicals. This means that licensees must not be advised to use cleaning chemicals with licensed products.

Beyond this it is not possible for Nordic Ecolabelling to control how the microfibre products are handled in the use phase.

Klimabolaget

Förslag på att alla förpackningar ska vara i papper.

Comments from Nordic Ecolabelling

Tak for jeres input.

I denne generation af kriterierne er det valgt ikke at sætte krav til emballage, men i stedet for at fokusere på andre opdateringer af krav, som har en større miljøeffekt for denne produktgruppe, bl.a. krav til holdbarhed af produkterne, kemikalier, recirkuleret polyester og test for tab af fiberfragmenter.

Smart Microfiber Systems

För mindre företag och för företag som endast har fåtal produkter att Svanen märka, så tror vi att de nya kriterierna kommer att få de att avstå från att ansöka om Svanen licens. För oss, så ser vi att de nya kriterierna kommer tillföra oss mycket högre kostnader och framför allt betydligt mer arbete än tidigare. Det verkar som att de nya kriterierna är mer riktade mot klädtextilindustrin och inte mot bra fungerande städ produkter som de tidigare kraven. Vad vi vet så kommer de flesta tillverkarna av mikro-fiber för rengöringsprodukter inte klara dessa kriterier. Hela idén med att använda mikro-fiber är väl för att förbättra för miljön, att låta materialet göra rent och reducera användandet av farliga kemikalier. Att använda en produkt med långlivslängd istället för engångsprodukter.

Vi vill inte låta negativa men vi är oroliga att många av de nya förslag ni föreslår inte gör produkten bättre utan dyrare och krångligare och det kommer öppna upp för lågpris som då inte bryr sig om varken kvalitet, utsläpp eller funktion.

Vi tycker som sagt att nya kriterierna är för komplicerade och kommer leda att många företag kommer att välja ingen eller annan märkning som Oeko-Tex, Eu Eco label eller t o m egna märkningar, vilken är varken bra för oss eller för er.

Comments from Nordic Ecolabelling

Tak for jeres input.

Generation 2 af kriterierne er fra 2010 og hermed en del år gamle, hvilket gør at en del krav kræver opdatering. Fokus i de nye kriterier har været på cirkulær økonomi, med bl.a. opdateret krav til god holdbarhed og god rengøringsevne, samt indførelsen af polyesterfibre med en andel af recirkuleret materialer.

Men vi har forståelse for omkostninger til test og har bl.a. derfor efter høringen justeret krav O43 Durability, hvor antallet af vaske er blevet sænket, krav O5 Recycled fibres/raw materials: Test for environmentally harmful substances, hvor antallet af stoffer, som skal testes for er blevet sænket og krav O27 BAT er blevet slettet.

Pfennig Reinigungstechnik

We are voting against this version.

For us as a medium-sized company it is not possible to manage the cost and time intensive effort for such a comprehensive certification.

We have discussed the generation 3.0 with Weber & Leucht and fully agree with their opinion and submitted arguments.

We have recently focused a lot on the sustainability of our cleaning trolleys and have made great progress there (recycled plastic, longevity etc) . Now we want to continue with the textiles.

Starting in the fall, we will have a new TEC team that will clearly pursue the goal of sustainability, which is also one of our top corporate goals. But as a medium-sized company, we just can constantly take small steps towards sustainability.

For us, the new criteria 3.0 are definitely a too big step in too little time.

If criteria generation 3.0 are established by nordic ecolabel, we will have to think seriously in the team whether we can and want to keep the Nordic Ecolabel certification.

Comments from Nordic Ecolabelling

Thank you for your input.

Generation 2 of the criteria is from 2010 and hereby quite a few years old, which means that several requirements require updating and new requirements are needed. We understand that the new criteria are more demanding, however after the consultation several requirements have been adjusted e.g., requirement O43 Durability where the number of washes has been lowered, requirement O5 Recycled fibres/raw materials: Test for environmentally harmful substances where the number of substances to be tested has been lowered and O27 BAT has been deleted.

Regarding comments from Weber & Leucht: Please see above in this chapter and under O5, O7, O8, O10, O41, O43, O44, O45, O48 and appendix 5.

Essity Hygiene and Health

Since these new criteria have been quite substantially revised with the issue of circularity in focus, there is a need to review the viability of the individual requirements when demands in different parts of the life cycle are combined. We question whether it is realistic to both increase the requirements on durability and functionality at the same time as increasing requirements on recycled content for the materials. The availability of recycled plastic is already scarce, and the added requirements on functionality will make it even more difficult to find material that meets the quality requirements.

Comments from Nordic Ecolabelling

Thank you for your input.

Generation 2 of the criteria is from 2010 and hereby quite a few years old, which means that several requirements require updating and new requirements are needed.

After the consultation several requirements have been adjusted e.g., requirement O43 Durability where the number of washes has been lowered to 300 for professional products and 100 for domestic products. Also, the minimum amount for recycled materials in polyester has been lowered from 30% to 25%.

Regarding the availability of recycled plastic please see under O8.

4.2 Product group delimitation

4.2.1 What can carry the Nordic Swan Ecolabel?

Pfennig Reinigungstechnik

Our practical work, we are increasingly finding that fibres < 1 dtex are not always the best choice for mop covers, which, in contrast to cloths, are subjected to much higher mechanical stress, e.g., due to the weight of the mop holder. In terms of durability and longevity, fibres up to 2 dtex achieve equally good cleaning results.

Comments from Nordic Ecolabelling

Thank you for your input.

The official definition of a microfibre is a fibre less than 1 decitex (Dtex) thick. We therefore find it problematic to change the definition in the criteria and have therefore kept the definition of a fibre less than 1 decitex (Dtex) thick.

4.3 Comments to the specific requirements

4.3.1 Section 2, Description of the product and the production chain

O1 Description of the product, material composition and limits

Wecovi

Overview of all ingoing materials:

Does this also mean all raw materials of packaging products? Carton, tape, stickers etc.

Comments from Nordic Ecolabelling

Thank you for your input.

No, this only includes materials used in the textile part and the cleaning tool. This is now more clearly described in requirement O1.

O2 Description of the production chain and the manufacturing processes

No comments in the consultation.

4.3.2 Section 3, Textile

O3 Textiles certified with the Nordic Swan Ecolabel

Miljøministeriet, Danmark

Miljøministeriet finder det vigtigt, at EU miljømærket tekstil kan indgå på linje med Svanemærket.

Comments from Nordic Ecolabelling

Tak for jeres input.

Kravet er nu blevet opdateret, så det inkluderer EU Ecolabel. Dog kan alle tekstilkrav ikke dokumenteres med EU Ecolabel. I det opdateret krav er det beskrevet hvilke krav, som kan dokumenteres med EU Ecolabel. Grunden til, at ikke alle krav kan dokumenteres ved EU Ecolabel, er primært EU Ecolabel-kriterierne er fra 2014 og hermed er en del år gamle og ikke helt opdateret på alle områder.

O4 Recycled fibres: Synthetic fibre – fossil origin

Essity Hygiene and Health

Comment:

EFSA or FSA approved: There is today a shortage of recycled fibres, and this requirement, although good in its intent, can worsen a strained situation.

New requirement:

”Chemical recycling processes where the end product of the chemical process is naphtha or pyrolysis oils (energy production) are not covered by the definition of "recycled material". Here, the process itself is considered a recovery rather than recycling”.

Comment:

Again, the availability of recycled fibres is limited, and as an industry we need to be open to different options for acquiring needed materials. Our suggestion is that recycled fibres should rather include this option.

Comments from Nordic Ecolabelling

Thank you for your input.

After the consultation the definition of chemical recycling has been deleted, so that e.g., chemical recycling by pyrolysis is accepted.

O5 Recycled fibres/raw materials: Test for environmentally harmful substances

Vileda Professional / Freudenberg

Alternatively it supplier confirms that the process has not changed since testing. Annual testing will increase costs significantly.

Comments from Nordic Ecolabelling

Thank you for your input.

After the consultation Nordic Ecolabelling has decided to lower the number of substances that must be tested, which will lower the cost. Because materials can

originate from various sources it is important that recycled material are tested on a regular basis.

Miljøministeriet, Danmark

Der er ikke krav om at PET fra flasker godkendt som fødevarekontaktmateriale skal testes. Dette giver anledning til bekymring for om et incitament til at bruge PET flasker i højere grad end andre materialer vil skabes. Dette er bestemt ikke ønskeligt, da PET flasker helst skal genanvendes i fødevarekredsløbet. Man kunne måske i stedet tilføje et krav om at kun udtjente flasker, som ikke kan genanvendes til flasker, må bruges. Her er det dog måske nødvendig at bibeholde testkravet da flaskerne kan være forurenede med ukendte stoffer.

Comments from Nordic Ecolabelling

Tak for jeres input.

Nordisk Miljømærkning er enige i at materiale som oprindeligt stammer fra emballage godkendt til fødevarer generelt ikke skal anvendes i tekstiler, men i stedet for skal genanvendes til ny emballage til fødevarer. Derfor skal recirkuleret materiale også leve op til krav O4 Recycled fibres: Synthetic fibre – fossil origin, hvor the recirkuleret materiale ikke må stamme fra EFSA- eller FDA-anlæg, som er godkendt til materiale til fødevarekontakt. Forventningen og håbet er at flere PET-flasker i fremtiden vil blive recirkuleret igennem EFSA- og FDA-anlæg.

Weber & Leucht

Comment:

O5 refers to a closed third-party certification and textile labelling system for recycled fibers and this can exclude other testing/QA/certification systems or laboratories. The mentioned standards are in-house methods of the referred certification system (trademark-protected) and not rooted to EN ISO or other standards published by standards organisations. Double-certification and double-testing leads to higher costs, because test reports are often available by manufacturers from other labs or certification systems.

Proposal:

Please insert published EN/ISO or other public available standards in the table of substance/substance group and limit. Ensure that accredited lab test reports, audit and QA systems are accepted as well, because many manufacturers have own QA and audit systems. It can also be assumed that the recycling industry will develop its own control procedures that continuously monitor production for harmful substance groups. These should also be recognised, as they can offer increased product safety compared to time-by-time testings.

Comments from Nordic Ecolabelling

Thank you for your input.

After the consultation Nordic Ecolabelling has decided to lower the number of substances that must be tested. The requirement can be fulfilled by testing or alternatively by a Oeko-Tec standard 100 class II certificate. As described in the consultation criteria the test method that must be used shall be as stated in Testing Methods Standard 100 by Oeko-Tex, which are public available, however after the consultation the test methods are now written in the requirement.

Own QA and audit systems cannot be accepted because the requirement should be the same for everyone and transparent which documentation is required.

Nordic Ecolabelling will follow the development in recycling industry. If new procedures are developed that ensure that no harmful chemicals will be present in the recycled materials, Nordic Ecolabelling is willing to assess these for possible implementation in the criteria. Please also note that there are certain exceptions for testing in the requirement.

Smart Microfiber Systems

Vänligen klargör vilka andra alternativ vi kan använda oss av är Oeko-tex 100 II. Finns det någon standard EN/ISO test att använda sig av?

Comments from Nordic Ecolabelling

Thank you for your input.

After the consultation Nordic Ecolabelling has decided to lower the number of substances that must be tested. The requirement can be fulfilled by testing or alternatively by a Oeko-Tec standard 100 class II certificate. As described in the consultation criteria the test method that must be used shall be as stated in Testing Methods Standard 100 by Oeko-Tex, which are public available, however after the consultation the test methods are now written in the requirement.

Essity Hygiene and Health

The LOQ for both lead and mercury is 0,1 mg/kg. What would be the test method for mercury when 0,02 mg/kg is required?

Comments from Nordic Ecolabelling

Thank you for your input.

After the consultation the test methods are now written in the requirement. For testing lead and mercury, you shall use the test method of:

Atomic absorption spectrometry (AAS) or ICP. The metals are extracted by use of artificial acidic sweat solution according to ISO 105-04 (testing solution II).

O6 Synthetic fibre: Bio-based origin

Miljøstyrelsen, Danmark

Miljøstyrelsen anbefaler alle virksomheder, der bruger mixprodukter, som f.eks. cellulose, at have krav i deres kontrol af materialet, til at der tages prøver. Prøverne sendes til laboratorie for test af om de oplyste træarter også er de træarter der er indeholdt i produktet.

Comments from Nordic Ecolabelling

Tak for jeres input.

For regenererede cellulose fibre (fx viskose) findes der er krav til træarter, som må anvendes (krav O13), samt krav til sporbarhed og certificering af træet (krav O14). Nordisk Miljømærkning vurderer at disse krav er på et passende niveau for at sikre at korrekte træarter anvendes. Vi følger dog de nye muligheder for at teste oprindelse af træ for evt. implementering i fremtidige relevante kriterier, hvor træ har høj relevans. I krav O6 vedr. oprindelse af bioråvare til produktion af biobaseret syntetiske fibre (fx biobaseret polyester) anvendes ofte andre råvare end cellulose fra træ (fx anvendes

sukkerrør eller majs) og fokus er derfor at sætte relevante krav til disse typer af råvare.

Essity Hygiene and Health

Synthetic fibres from bio-based origin must contain at least 90% bio-based raw material, documented by testing in accordance with ISO 16620, ASTM D6866 or equivalent standard.

Comment:

Whatever level of bio-based origin fibre, is it not better to have a test on product level for the actual product bio-based content?

Comments from Nordic Ecolabelling

Thank you for your input.

This requirement is connected to O8 for polyester if bio-based polyester is chosen here. The requirement is to show that the main part of the bio-based polyester is in fact bio-based.

O7 Polyamide

Vileda Professional / Freudenberg

This should be skipped as PA is hardly available in recycled quality. Replace this requirement with the overall recycled share of the textile product of total 30%. So higher share in PES can compensate rPA share.

Comments from Nordic Ecolabelling

Thank you for your input.

Please be aware that the requirement can be fulfilled by either a amount of recycled polyamide or limit of emissions to air of N₂O during monomer production. This means that recycled polyamide is not mandatory.

Regarding suggestion about an overall recycled share of the textile product that could be a possibility, however as different products can have different textile fibre composition, it is decided to have requirements to each fibre type instead of to the whole textile part. This means that for e.g., polyester (requirement O8) a minimum 30 % of the polyester fibres must either be composed of recycled material or be bio-based.

Chamlon

In the criteria it is stated that a minimum of 20% by weight of the polyamide fibres must compromise of recycled material.

The current product that we have does contain 100% new polyamide fibres. We have had an consultation with our fabric supplier.

They state that when 20% of the material composes of recycled materials, they face several issues.

Since the material is a non-woven microfiber, they do not jet know what happens when they mix 20% of recycled fibres with the new fibres.

During the TechTextil show we talked to Nurel about this topic.

Nurel is specialized in Polyamide fibres and also recycled polyamide fibres.

They told us that the incorporation of recycled polyamide fibres in the material is not a problem.

However, there is a problem in the feed stock of the recycled fibres.

To obtain recycled polyamide fibres is very hard. It is not like polyester (which can be obtained by PET bottles).

Polyamide can be obtained from fish nets. But they are usually contaminated. So, getting 100% recycled polyamide fibres is hard.

Lastly Nurel also told us that the amount of recycled polyamide they can get from sources is limited. Currently all of the recycled polyamide they can get is also being used.

So, the biggest issue will be the source of the recycled polyamide fibres.

Comments from Nordic Ecolabelling

Thank you for your input.

Please be aware that the requirement can be fulfilled by either a amount of recycled polyamide or limit of emissions to air of N₂O during monomer production. This means that recycled polyamide is not mandatory.

Weber & Leucht

Comment:

Polyamide, Polyurethane is not state of the art technology, see comment No. 3

Proposal:

We recommend deleting these criteria until sufficient experience is available.

Comments from Nordic Ecolabelling

Thank you for your input.

Please be aware that the requirement can be fulfilled by either an amount of recycled polyamide or limit of emissions to air of N₂O during monomer production. This means that recycled polyamide is not mandatory.

Smart Microfiber Systems

Den mikro-fiber som vi använder för våra produkter består av 80% polyester och 20 polyamid.

Vad det gäller polyamiden så har vi inte hittat någon bra lösning med återvunnen polyamid blandad med polyester. Som ni vet så består mikro-fiber som går att spitta/dela av 20% polyamid och 80% polyester. Detta unika material tillverkas genom att man smälter ner 80% polyesterchip och 20% polyamidchip som sedan bildar en fiber bestående av 80% polyester 20% polyamid. Mixen av 2 material i en fiber gör detta material unikt. I andra textilier så består mixen av material av 100% polyesterfiber, 100% polyamid fibrer, 100% bomulls fibrer, vilket gör en enorm skillnad när det gäller återvunnet material. Vi har pratat med de fibertillverkare som vi använder och de ytterst tveksamma om att de kommer att fungera att blanda in återvunnen polyamid i mikro-fibern och de tror att kvaliteten på den här fibern kommer att försämrans markant. Och vad vi vet efter undersökning så finns det ingen som tillverkar 80/20 mikro-fiber med återvunnen polyamid.

Om kravet på minst 20% polyamid kvarstår så tror att vi måste sluta med splittad mikro-fiber och övergå till 100% polyester (osplittad) mikro-fiber för våra svanen märkta produkter och då vet vi alla att funktionen kommer att bli betydligt sämre.

Bifogar 2 fiber specifikation till de tillverkarna som vi jobbar med idag och här kan ni se de fibrerna med återvunnen fiber som de kan tillverka idag.

Vårt förslag att vi i detta skede satsar på minst 30% återvunnet material för polyester, vilket vi vet kommer fungera bra och kan återkomma till återvunnen polyamid mixat med polyester vid nästa revidering.

Comments from Nordic Ecolabelling

Tak for jeres input.

Være venligst opmærksom på, at der i kravet til polyamid er en alternativ mulighed til recirkuleret materiale, hvor der i stedet for er krav til N₂O-emissioner under monomer-produktionen.

Være desuden venligst opmærksom på det er minimum 20% af polyamid-fibre som skal bestå af recirkuleret materiale (hvis man vælger denne alternative mulighed i kravet). Det vil det sige at minimum 20 vægt% af polyamidchipsene skal være af recirkuleret polyamid. I jeres tilfælde med 20 % polyamid i jeres mikrofiber, så vil det sige at mikrofiberen indeholder 4% recirkuleret polyamid.

Essity Hygiene and Health

For nylon 6 and nylon 6.6 the emissions to air of N₂O during monomer production, expressed as an annual average, must not exceed 9,0 g N₂O/kg.

Comment:

Earlier the requirement for nylon 6,6 was 50 g/kg produced. Is there enough evidence that the nylon 6.6 can have as low number as the limit for nylon 6?

Comments from Nordic Ecolabelling

Thank you for your input.

In this case the requirement is the same as in EU Ecolabel (2014) and Blue Angel (2017). We therefore expect the limit to be realistic and possible to live up to

O8 Polyester

Vileda Professional / Freudenberg

See comment PA, better say 30% of manmade fibres of the textile product should be coming from recycled source.

Comments from Nordic Ecolabelling

Thank you for your input.

Please see comment under O7.

After the consultation the minimum amount of recycled materials in polyester fibres have been changed from 30% to 25%.

Dansk Erhverv

Det gælder genanvendelse af fibre. Her mener vi det er vigtigt, at der i første omgang prioriteres fiber-til-fiber-genanvendelse. Vi er meget bevidste om at teknologien for en opskalering af tekstil-genanvendelse mangler, men fra et miljø- og klima perspektiv har det større impact, hvis fibre først laves om til nye tekstilfibre inden de ryger ned i hierarkien (isolationsmateriale etc.).

Vi regner med at tekstiler i 2030 kan indeholde ca. 10 % genanvendte fibre.

Comments from Nordic Ecolabelling

Tak for jeres input.

Alt recirkuleret plast som anvendes til produktion af tekstilfibre, skal leve op til krav O4 Recycled fibres: Synthetic fibre – fossil origin. Her stilles der krav om at det recirkuleret plast ikke må stamme fra anlæg, der er EFSA eller FDA godkendt til fødevarerkontakt eller markedsføres som kompatibelt med disse. Med dette krav undgås at recirkuleret plast, som kan anvendes til emballage med fødevarerkontakt, ”downcycles” til anvendelse i mikrofiberprodukter.

Når tekstilaffald omdannes til nye råmaterialer, reduceres ressourceforbruget og CO₂-udslippet. For tekstiler er fiber-til-fiber recirkulering dog stadig meget begrænset og i dag stammer de recirkulerede syntetiske polymerer oftest fra andre materialer fx plastemballage.

Det er derfor ikke muligt på nuværende tidspunkt at stille krav om at det recirkuleret materiale skal stamme udelukket fra tekstiler. Kravet accepterer derfor både fiber-til-fiber recirkulering samt polymer-til-fiber recirkulering.

Asli

Vi har som ”producent” af mikrofiberklude en bekymring for, at kvaliteten af produktet vil forringes hvis man bruger genbrugsmaterialer, således at forbrugeren ender med at udskifte sine produkter oftere.

Desuden vil anvendelsen af genbrugsmaterialer ikke nødvendigvis bidrage til den cirkulære økonomi, da det for eksempelvis recirkuleret PA ikke altid er muligt at genbruge det. Kun hvis den recirkuleret PA kommer fra en kemisk recirkuleringsproces vil det være muligt at genanvende den igen, som er grundtanken i cirkulær økonomi.

Comments from Nordic Ecolabelling

Tak for jeres input.

Vedr. polyamid gør vi opmærksomme på at der i krav O7 er to muligheder for at opfylde kravet, enten ved min. 20 % recirkuleret polyamid eller ved max. 9,0 g N₂O/kg emission under monomerproduktionen. Der er altså ikke et obligatorisk krav om min. andel recirkuleret polyamid.

I krav O8 er der krav om at min. 30 % af polyesterfibre skal være lavet af recirkuleret materiale eller af biobaseret materiale. Det er altså ikke 30 % af mikrofiberproduktet, som skal bestå af recirkuleret materiale (kun hvis mikrofiberproduktet består af 100 % polyester). Efter høringen er kravet sænket til 25 % recirkuleret materiale i polyesterfibre.

For at sikre at produkterne har en god holdbarhed skal der leve op til krav O43 Durability, krav O44 Removal of dust and dirt og hvis relevant krav O45 Assessment of hygienic conditions (measurement of quantities of micro-organisms).

Vikan

Kraven på recycled fiber är nästan helt omöjligt att uppfylla. Om det finns fiberproducenter som kan leverera mikrofiberer som använder recycled PES och/eller

PA så bör Nordic Ecolabel tillhandahålla en lista på sådana leverantörer. Visst finns det recycled PA och PES på marknaden men om det fungerar att spinna tillsammans som man gör en splitfiber har jag inte sett, och om det finns så ska det klara 500 tvättar med fortsatt funktion....

Jeg udtrykte også i mit høringssvar bekymring om tilgængelighed (både kvalitet og mængde) af recycled microfiber egnet til microfiberklude der vil kunne opfylde funktionskravene.

Comments from Nordic Ecolabelling

Tak for jeres input.

Vedr. polyamid gør vi opmærksomme på, at der i krav O7 er to muligheder for at opfylde kravet, enten ved min. 20 % recirkuleret polyamid eller ved max. 9,0 g N₂O/kg emission under monomerproduktionen. Der er altså ikke et obligatorisk krav om min. andel recirkuleret polyamid.

I krav O8 er der krav om, at min. 30 % af polyesterfibrene skal være lavet af recirkuleret materiale eller af biobaseret materiale. På markedet i dag findes produkter som består af en høj andel recirkuleret polyester, hvor det samtidigt claimes at produkterne har en holdbarhed på op til 500 vaske. Polyester er den plasttype, hvor der er bedst tilgængelighed af recirkuleret materiale. På baggrund af dette anses det for rimeligt og passende at Svanemærket sætter krav om en min. andel recirkuleret polyester samt god holdbarhed for produkterne. Efter høringen er kravet sænket til 25 % recirkuleret materiale i polyesterfibre og antal vaske for professionelle produkter er sænket til 300.

Procurator

En förflyttning mot återvunnen råvara kan skapa brist på marknaden. Utöver dålig tillgång på svanemärka slutprodukter i återvunnet material skulle även detta ge ökade kostnader med samma resultat som i ovan punkt nr 2.

Comments from Nordic Ecolabelling

Tak for jeres input.

Efter høringen er kravet sænket til 25% recirkuleret materiale i polyesterfibre. Polyester er den plasttype, hvor der er bedst tilgængelighed af recirkuleret materiale. Nordisk Miljømærkning anerkender at tilgængeligheden af recirkuleret materiale evt. kan være begrænset og kan være dyrere, men med øget efterspørgsels, bedre affaldsindsamling og -sortering vil produceret mængder af recirkuleret plast forhåbentligt vis tilpasse sig til efterspørgslen. Det er vigtigt at Svanemærket er med til at understøtte processen til en mere cirkulær økonomi.

Stockholm Städgross

Problemet som vår tillverkare ser det, är att det är svårt eller kan bli svårt att få tag på tillräckligt med återvunnet material just nu.

Tex PET plast för att göra polyester och polyamid. Kriget har också ställt till en hel del problem med tillgång till material.

Det är en utmaning just nu är att få tag på tillräckligt mycket återvunnet material. Det är framförallt dom stora klädföretagen som tar det mesta. Och blir det något över så kan dom köpa det som finns.

Comments from Nordic Ecolabelling

Tak for jeres input.

Efter høringen er kravet sænket til 25% recirkuleret materiale i polyesterfibre. Polyester er den plasttype, hvor der er bedst tilgængelighed af recirkuleret materiale. Nordisk Miljømærkning anerkender at tilgængeligheden af recirkuleret materiale evt. kan være begrænset og kan være dyre, men med øget efterspørgsels, bedre affaldsindsamling og -sortering vil produceret mængder af recirkuleret plast forhåbentligt vis tilpasse sig til efterspørgslen. Det er vigtigt at Swanemærket er med til at understøtte processen til en mere cirkulær økonomi.

Vedr. polyamid gør vi opmærksomme på at der i krav O7 er to muligheder for at opfylde kravet, enten ved min. 20% recirkuleret polyamid eller ved max. 9,0 g N₂O/kg emission under monomerproduktionen. Der er altså ikke et obligatorisk krav om min. andel recirkuleret polyamid.

Weber & Leucht

Comment to requirement O6-O15:

The complete recycling part is not state of the art. A cleaning textile with high mechanical action is not a fashion textile. One example: The used fibres have a special fibre shape to increase the mechanical action on the surface. The available recycled fibres are mostly made for fashion and not made for technical textiles with special functions. The stricter performance criteria of the new standard can lead to problems achieving the functionality (soil removal, water absorbency, hygiene assessment) and the availability of the recycled fibres on the market is unclear, especially if the fashion industry starts to buy lot of recycled materials.

Proposal:

A certification standard should be based on state-of-the-art product groups available on the market. We have testing results showing that the use of recycled fibres, which do not have the usual properties of microfibers of cleaning textiles, reduce the performance significantly. This can lead to the textiles being designed with a higher weight in order to meet the performance criteria. This would call into question the actual reduce objective of the circular economy. We therefore warn against making fibre requirements without taking into account that cleaning textiles must meet special properties. The step of requiring a minimum use of recycled fibres and at the same time raising the performance criteria should only take place if sufficient evidence-based data are available and the availability of the recycled fibres can actually be guaranteed. This is increasingly problematic under the current economic policy circumstances, especially if small purchase quantities are required for special products. Therefore, the standard should be limited to achievable criteria (e.g., recycling PET-use) and criteria for fibres that are not yet state of the art (e.g., recycled polyamides) should not (yet) be included in the criteria catalogue.

Comments from Nordic Ecolabelling

Thank you for your input.

It is only mandatory that 30% of the polyester fibres are recycled (or bio-based), and that polyurethane fibres are recycled if the textile part contains more than 10% polyurethane fibres. For all other fibre types recycled fibres is an option but are not mandatory. After the consultation the minimum amount of recycled/bio-based materials in polyester fibres have been changed to 25%.

Polyester is the type of recycled material with the best availability. Nordic Ecolabelling recognizes that the availability of recycled material may be limited and can be more expensive, but with increased demand, better waste collection and sorting, quantities of produced recycled material will hopefully adapt to demand. It is important that the Nordic Ecolabel helps to support the process to a more circular economy.

On the market today, there are products that consist of high share of recycled polyester, where it is also claimed that the products have a durability up to 500 washes. On the basis of this, it is considered reasonable and appropriate that the Nordic Ecolabel sets requirements for min. 25% recycled polyester and good durability for the products. After the consultation the numbers of washes for professional products has been lowered to 300.

Smart Microfiber Systems

Vi kan acceptera att 30% återvunnen polyester, men vill påpeka att det kan innebära att produkten kan bli sämre i funktion och livslängd. Vi förutspår att det kommer att bli problem med att få tag på återvunnet material då de flesta sportkläder och modeföretag, har lovat att endast använda återvunnet material för alla sina plagg inom ett par år. Det kommer inte att finnas tillräckligt med material att tillgå och priserna på återvunnet material kommer skjuta i höjden.

Comments from Nordic Ecolabelling

Thank you for your input.

Efter høringen er kravet sænket til 25% recirkuleret materiale i polyesterfibre. Polyester er den plasttype, hvor der er bedst tilgængelighed af recirkuleret materiale. Nordisk Miljømærkning anerkender at tilgængeligheden af recirkuleret materiale evt. kan være begrænset og kan være dyre, men med øget efterspørgsels, bedre affaldsindsamling og -sortering vil produceret mængder af recirkuleret plast forhåbentligtvis tilpasse sig til efterspørgslen. Det er vigtigt at Svanemærket er med til at understøtte processen til en mere cirkulær økonomi.

På markedet i dag findes der produkter, som består af en høj andel genanvendt polyester, hvor det også hævdes, at produkterne har en holdbarhed på op til 500 vaske. Det vurderes på baggrund heraf rimeligt og passende, at Svanemærket stiller krav til min. 25% genanvendt polyester og god holdbarhed for produkterne.

Essity Hygiene and Health

Minimum 30 % by weight of the polyester fibres must either be composed of recycled material* (see definition of recycled material in O4) or be bio-based. Recycled material must fulfil requirement O4 and O5. Bio-based material must fulfil requirement O6.

Comment:

The availability of recycled PET fibres or biobased fibre today is scarce and the content demand for as much as 30 % is too high. We think that the level should be lowered for a future stepwise approach.

There should be a combination with revised criteria on durability. Either the new criteria on durability is fulfilled, or there is a lower durability limit if a certain amount of the fibres are recycled or renewable.

Comments from Nordic Ecolabelling

Thank you for your input.

After the consultation the minimum amount of recycled materials in polyester fibres have been changed from 30% to 25%. On the market today, there are products that consist of a high share of recycled polyester, where it is also claimed that the products have a durability up to 500 washes.

On the basis of this, it is considered reasonable and appropriate that the Nordic Ecolabel sets requirements for min. 25% recycled polyester and good durability for the products. After the consultation the numbers of washes for professional products has been lowered to 300.

O9 Polypropylene

No comments in the consultation.

O10 Polyurethane

Weber & Leucht

Comment:

Polyamide, Polyurethane is not state of the art technology, see comment No. 3

Proposal:

We recommend deleting these criteria until sufficient experience is available.

Comments from Nordic Ecolabelling

Thank you for your input.

Please see comment under O8.

O11 Cotton fibres

Smart Microfiber Systems

För de flesta produkter med mixat material, så är andelen bomull liten och köps in av microfiber tillverkaren. Om dessa kriterier innebär att tillverkaren måste certifiera sig hos BCI så tror vi att man kommer att välja att inte svanen märka dessa produkter.

Comments from Nordic Ecolabelling

Tak for jeres input.

Vær venligst opmærksom på at krave først gælder når tekstildelen (fx mikrofiberkluden) indeholder mere en 10 vægt% bomuld.

BCI-bomuld er én af flere muligheder i kravet, bomulden kan også være for eksempel økologisk eller recirkuleret.

O12 Regenerated cellulose fibre: Recycled textile fibre

Essity Hygiene and Health

It is very hard to understand how these requirements are to be read. Either the fibre can be 100 % recycled, or, if from fresh wood fibre pulp, there is a limitation of tree species used for the pulp? And then any combination of these fibres can be used? I.e., there is no actual limit on how much recycled fibre to use? Which is reasonable since this is a renewable source for the material.

Comments from Nordic Ecolabelling

Thank you for your input.

It is correctly understood that the fibres must either be:

- 100 % recycled
Or
- if from fresh wood fibre pulp: a limitation of tree species (O13), and traceable and certified raw materials (O14)
Or
- A combination of the two points above

O13 Regenerated cellulose fibre: Limitation of tree species

Miljøstyrelsen, Danmark

Miljøstyrelsen har svært ved at se sammenhængen i, at Svanemærket har fuld tillid til FSC's og PEFC's retningslinjer for bæredygtig skovdrift og samtidig fører en liste med træarter, der ikke tillades i Svanemærket ([Forestry Requirements 2020 | Nordic Ecolabel \(nordic-ecolabel.org\)](#)). Hvis Svanemærket vælger FSC og PEFC som udtryk for definitionen af bæredygtig skovdrift, må det være FSC's og PEFC's ansvar at definere, hvilke træarter, der kan opnå et certifikat fra de to organer.

Miljøstyrelsen finder, at flere arter på listen dyrkes i plantagebrug flere steder i verden, og derfor vil være uproblematisk ud fra et bæredygtighedsperspektiv.

Comments from Nordic Ecolabelling

Tak for jeres input.

Nordisk Miljømærkning anser både FSC og PEFC som troværdige certificeringsordninger som understøtter ansvarligt og lovligt skovbrug. Begge ordningers standarder/systemer for ansvarligt skovbrug er forbedret meget gennem de seneste 25 år, men der er stadigvæk potentiale for at standarderne beskytter skovdrift i urørte skovområder bedre sk. IFL - Intact Forest Landscapes, end hvad de gør i dag. Særligt tropiske skove er vigtige for jordens biodiversitet, hvilket også afspejles i de mange forskellige holdninger der er til træ fra tropiske skove i de nordiske lande. De nye 2020-krav til listen over træarter, som ikke må anvendes i miljømærkede produkter, giver mulighed for at anvende mange af de listede træarter, hvis de opfylder en række krav. Dette gælder også listede træarter dyrket i plantager.

Upphandlingsmyndigheten

I kravet O13 krävs det att leverantören har träråvara märkt med FSC/PEFC för att uppfylla kravet. I krav O14 så ska leverantören uppvisa ett certifikat från FSC eller PEFC. Upphandlingsmyndigheten gav en advokatfirma i uppdrag att bedöma FSC i början av 2019, det vill säga den föregående versionen av FSC:s standard granskades. Deras bedömning var att märkningen inte uppfyller samtliga

förutsättningar i LOU. Det återfanns krav som inte var förenliga med anknytningskravet respektive objektivitetskravet. Någon genomgång av FSC:s uppdaterade standard har inte genomförts.

Läs mer om de olika kraven i LOU på [Upphandlingsmyndighetens webbplats](#).

Om det finns möjlighet att bevisa uppfyllnad av kraven på alternativa sätt föreslår därför Upphandlingsmyndigheten att det läggs till. Ni har till exempel i krav O5 lagt in att det kravet uppfylls om leverantören kan visa att materialet antingen uppfyller Ökotex eller har en testrapport som visar det.

Comments from Nordic Ecolabelling

Tak for jeres input. Nordisk Miljømærkning (NM) følger hele tiden med i udviklingen af certificeringsordninger som understøtter ansvarligt og lovligt land- og skovbrug, og evaluerer de standarder der er relevant for en given produktgruppe. NM bedømmer, at både FSC og PEFCs nyeste standarder for ansvarligt skovbrug opfylder Svanens krav til råvarestandarder samt sporbarhed. FSC og PEFC er globale standarder som er accepteret og integreret i skovbruget, industrier, myndigheder og forbrugere og der findes få alternativer. Hvis NM modtager forespørgsel for tilladelse til brug af alternative råvarestandarder, bedømmes disse mod NMs krav til råvarestandarder. Hvis standarden bedømmes til at opfylde kravene, kan den indgå som dokumentation for kravet.

Essity Hygiene and Health

It is very hard to understand how these two requirements are to be read. Either the fibre can be 100 % recycled, or, if from fresh wood fibre pulp, there is a limitation of tree species used for the pulp? And then any combination of these fibres can be used? I.e., there is no actual limit on how much recycled fibre to use? Which is reasonable since this is a renewable source for the material.

Comments from Nordic Ecolabelling

Thank you for your input.

Please see under O12.

O14 Regenerated cellulose fibre: Traceability and certified raw materials

Upphandlingsmyndigheten

I kravet O13 krävs det att leverantören har träråvara märkt med FSC/PEFC för att uppfylla kravet. I krav O14 så ska leverantören uppvisa ett certifikat från FSC eller PEFC. Upphandlingsmyndigheten gav en advokatfirma i uppdrag att bedöma FSC i början av 2019, det vill säga den föregående versionen av FSC:s standard granskades. Deras bedömning var att märkningen inte uppfyller samtliga förutsättningar i LOU. Det återfanns krav som inte var förenliga med anknytningskravet respektive objektivitetskravet. Någon genomgång av FSC:s uppdaterade standard har inte genomförts.

Läs mer om de olika kraven i LOU på [Upphandlingsmyndighetens webbplats](#).

Om det finns möjlighet att bevisa uppfyllnad av kraven på alternativa sätt föreslår därför Upphandlingsmyndigheten att det läggs till. Ni har till exempel i krav O5 lagt in att det kravet uppfylls om leverantören kan visa att materialet antingen uppfyller Ökotex eller har en testrapport som visar det.

Comments from Nordic Ecolabelling

Tak for jeres input.

Se venligst under O13.

O15 Regenerated cellulose fibre: Bleaching with chlorine gas

No comments in the consultation.

O16 Regenerated cellulose fibre: Process

Smart Microfiber Systems

Ok

Comments from Nordic Ecolabelling

Thank you for your input.

O17 Overview of chemical products

No comments in the consultation.

O18 Classification of chemical products

No comments in the consultation.

O19 Prohibition of CMR substances

Miljøstyrelsen, Danmark

Under hensyntagen til forsigtighedsprincippet, foreslår Miljøstyrelsen at TiO₂ kun undtages, hvis stoffet er essentielt for produktets funktion og altså ikke hvis tilsætningen udelukkende sker for at opnå en bestemt æstetisk egenskab.

Comments from Nordic Ecolabelling

Tak for jeres input.

Kriterierna justerades och undantaget för TiO₂ togs bort.

TiO₂ verkar användas endast som färgmedel.

O20 Prohibited substances

Miljøstyrelsen, Danmark

Under de hormonforstyrrende stoffer kunne det overvejes at tilføje de stoffer, der er identificeret som ED- under Biocid og pesticidforordningerne.

Comments from Nordic Ecolabelling

Tak for jeres input.

Enligt våra experter ska listorna från edlists.org täcka även ämnen som uppfyller kriterierna för ED enligt BPR och PPPR.

Lista I: ämnen som identifierats som EDs enligt beslut i EU-lagstiftning inkl REACH, Biocidförordningen (BPR), Växtskyddsmedelsförordningen (PPPR), Kosmetikaförordningen.

Lista II: ämnen som är under ED-utredning inom EU-lagstiftningsprocess inkl REACH (dvs ämnen på CoRAP), BPR, PPPR, Kosmetikaförordningen.

Lista III: ämnen som den behöriga myndigheten i ett medlemsland anser är EDs.

Essity Hygiene and Health

Here we have got recent input from colleagues that are experts in the area and have not had time to fully relate to the comments and possible consequences thereof. We would appreciate to be able to come back after the summer vacations.

Comments from Nordic Ecolabelling

Thank you for your input.

Your experts are free to send their comments after the summer vacation. Though they must come shortly after. Indeed, once we have gone further with the revision process and the criteria have been approved by our board, you will have to wait until they are published to send an adjustment request, if necessary.

O21 Degradability of detergents, softeners, and complexing agents

No comments in the consultation.

O22 Bleaching agents

No comments in the consultation.

O23 Chemicals containing silicone

Nordexia

3.3 Textile chemicals: Specific requirements

O23 Chemicals containing silicone

D4 (CAS no. 556-67-2), D5 (CAS no. 541-02-6) and D6 (CAS no. 540-97-6) shall only be present in the form of residues from the raw material production, and each shall only be present in amounts up to 1000 ppm in the silicone raw material (the chemical).

Test from the chemical product manufacturer/supplier showing that the requirement is met. The analysis laboratory must fulfil the requirements in Appendix 2.

It is suggested that on the basis of the current raw materials used for microfiber, products including recycled fibre should be added, and the two should be in a parallel relationship, rather than only using recycled fibre.

For at least five years, the two should coexist.

Comments from Nordic Ecolabelling

Thank you for your input.

Nordic Ecolabelling unfortunately cannot comment because we do not fully understand the comment.

O24 Biocides and antibacterial substances

No comments in the consultation.

O25 Polymers and their additives in finishes

No comments in the consultation.

O26 Wastewater from wet processes

Vileda Professional / Freudenberg

Good to connect COD limit to liter wastewater and not connected to kg textile, production is always struggling to collect all info for this calculation

Comments from Nordic Ecolabelling

Thank you for your input.

O27 Implementation of Best Available Techniques (BAT) for energy and water consumption

Vileda Professional / Freudenberg

Energy consumption is hard to get from production, sometimes impossible. Proposal focus only on waste water consumption otherwise it will be hard to full-fill this requirement.

BAT: This is unrealistic to realize with most dye houses we are afraid. Very often dye houses are producing for many textiles manufacturer and will change for some production.

Comments from Nordic Ecolabelling

Thank you for your input.

After the consultation the requirement has been deleted.

Smart Microfiber Systems

Vad det gäller BAT så drivs de flesta infärgningsfabriken med naturgas i Kina, även där vår mikro-fiber textil produceras och de är strikt kontrollerade av den kinesiska staten. Det är även staten som beslutar hur fabriken drivs, utsläpp och vilka förbättringar som ska utföras. Vi kan åta oss att påverka våra partnerfabriker att använda sig av bästa möjliga teknik. Men i slutändan så är det den kinesiska staten som beslutar vilka förbättringar som ska ske. Vi vet att staten kommer med krav på förbättringar av infärgning, utsläpp, mm löpande och våra fabriker jobbar kontant på att förbättra sig och följa de nya reglerna.

Comments from Nordic Ecolabelling

Thank you for your input.

Efter høringen er kravet blevet slettet.

Essity Hygiene and Health

The applicant shall demonstrate that the energy used for e.g., washing, drying, bleaching, and curing associated with dyeing, printing, and finishing of the textile is measured and compared with BAT levels or own figures from before implementing efficiency techniques.

This shall be done as a part of an energy management system or a system for the management of CO2 emissions. The requirement may be documented per process.

Comment:

For this requirement it is important to connect to the possible and preferable way of working with environmental management systems, since such a system identifies the significant environmental aspects for the production. A possible certification of ISO 14001 also simplifies verification.

Comments from Nordic Ecolabelling

Thank you for your input.

After the consultation the requirement has been deleted.

Stockholm Städtgross

Gällande infärgning och smutsvatten, är det statliga företaget som sköter vattenrening. Det gör att det tar tid att undersöka och få svar på när dom kan möta nya krav. Samt att införa. Tex solenergi osv.

Comments from Nordic Ecolabelling

Tak for jeres input.

Vedr. Spildevand, så er der separat krav til dette i krav O26 Wastewater from wet processes.

Med hensyn til BAT, så er kravet blevet slettet efter høringen.

4.3.3 Section 4, Cleaning tools

O28 Material recovery

No comments in the consultation.

O29 Aluminium: Recycled content

No comments in the consultation.

O30 Plastic: Information on polymer type and surface treatment

No comments in the consultation.

O31 Plastic: Polymer types and plastic composites – Ban

No comments in the consultation.

O32 Plastic: Marking for recycling sorting

No comments in the consultation.

O33 Plastic: Recycled contents

No comments in the consultation.

O34 Plastic: Chemicals in recycled plastic

Miljøstyrelsen, Danmark

Miljøstyrelsen anbefaler, at Miljømærkning DK på sigt udvikler krav til hyppighed og krav til i hvilke situationer, der bør testes for de nævnte kemikalier set i lyset af,

at genanvendt plastik ofte vil være en meget inhomogen fraktion med stor batchvariation.

Comments from Nordic Ecolabelling

Tak for jeres input.

Der er krav om procedure for at sikre, at den recirkuleret plast også i fremtiden overholder kravgrænserne. Det er korrekt, at det ikke yderligere er præciseret, hvor ofte der fx skal udføres test.

I baggrundsdokumentet står dog:

”The requirement can, for example, be documented by describing the sources of the plastic, the types of product from which the plastic originates and the typical use of brominated and chlorinated flame retardants, cadmium, lead, mercury, chromium IV and arsenic in these product types. If tests for these substances are carried out, the requirement can be documented by having a procedure for how often and in which situations testing will be carried out”.

Det er valgt på nuværende tidspunkt ikke at præcisere krav til procedure yderligere, da kilderne til den recirkuleret plast kan være mange og på andre måder end test kan sikres at der leves op til kravgrænserne (fx kender de eksakte kilder og hermed indhold af tungmetaller og flammehæmmer). I forbindelse med sagsbehandling af licensansøgning vil den beskrevet procedure blive vurderet.

O35 Plastic: Raw materials for bio-based polymers

No comments in the consultation.

O36 Surface treatment: Antibacterial substances

No comments in the consultation.

O37 Surface treatment: Nanomaterials

No comments in the consultation.

O38 Surface treatment of metals: Coating/plating/galvanizing

No comments in the consultation.

O39 Surface treatment of plastic: Type of surface treatment

Miljøstyrelsen, Danmark

Miljøstyrelsen mener, at man bør overveje stramning af dette krav, til at omfatte al overfladebehandling (inkl. tryk og maling), set i lyset af at muligheden for genanvendelse forringes og at dekoration formentligt ikke kan anses for at være essentiel for produktets funktion.

Comments from Nordic Ecolabelling

Tak for jeres input.

Vi er enige i, at dekoration ikke er essentiel for produktets funktion og har derfor justeret kravet, således at ingen typer af overfladebehandlinger tillades.

O40 Additives in plastic

No comments in the consultation.

4.3.4 Section 5, Quality and performance requirements

O41 Dimensional changes after washing and drying

Vileda Professional / Freudenberg

High quality PES show a typical shrinkage between 5-8% without any negative impact for end-user. Proposal changes max value to 8%.

If shrinkage of textile is max. 8% there should be no requirement to mention shrinkage to end-user, there would be no benefit. Proposal: take this sentence out.

Comments from Nordic Ecolabelling

Thank you for your input.

The requirement regarding max. 6%-dimension change is unchanged from generation 2 of the criteria. Because products until now have lived up to this and because 6% is in the interval mentioned it is decided to keep the requirement at a maximum of 6 %-dimension change.

It is decided to delete the requirement regarding information about dimensional change on the packaging or other product information, as it is not considered to be very important information for most customers.

Ecolab Deutschland

It makes no sense to specify a maximum shrinkage value after washing and drying and to do the washing tests with the mentioned Norm:

DIN EN ISO 6330:2013-02

Textilien - Nichtgewerbliche Wasch- und Trocknungsverfahren zur Prüfung von Textilien (ISO 6330:2012); Deutsche Fassung EN ISO 6330:2012

The customers mostly use professional washing and drying machines and very often they use higher washing temperature than recommended.

So, it makes no sense to give detailed information of the dimensional changes of a cleaning textile after washing and drying on the packaging and/or in other product information.

The customer can neither be forced to use a special washing and drying procedure for a textile nor to use a special cleaning tool. With specific shrinkage data the discussion will start with the customer.

It is more sensible to give the customer a washing and drying instruction for the textiles, which were tested by the supplier.

The requirements 041 should be deleted.

Comments from Nordic Ecolabelling

Thank you for your input.

The requirement regarding maximum dimension change is considered an important quality property of the microfibre product, so that the surface area does not change significantly after washing and drying.

EN ISO 6330 test method is a commonly used test for textiles and is also the test method required in generation 2 of the criteria.

However, it is decided to delete the requirement regarding information about dimensional change on the packaging or other product information, as it is not considered to be very important information for most customers.

In requirement O49 Instructions laundry instructions with directions regarding care as well as recommended and maximum washing temperatures must be given to the customer.

Weber & Leucht

Comment:

The dimensional change of cloths and mopps is an important quality criteria covered in the acutal criteria catalogue. Dimensional change requirement saves raw material due to circular economy concepts. It's not only the fitting to equipment, because a high shrinkage leads to a lower cloth surface and therefor if folding technics used to ensure hygiene (in professional market a teached concept) you are not able to clean the same square meter amount.

Proposal:

Keep the active criteria as described in V. 2.6.

Comments from Nordic Ecolabelling

Thank you for your input.

We can see the importance in that the requirement also apply for cloths, and not only for microfibre products that are to be fitted on a cleaning tool.

The requirement is therefore changes, so that it applies for all products.

Smart Microfiber Systems

Ok

Comments from Nordic Ecolabelling

Thank you for your input.

O42 Colour fastness to washing

No comments in the consultation.

O43 Durability

Vileda Professional / Freudenberg

Products for professional use: To carry out such a test externally it would be much to costly, internally washing it might be realistic to do it. But 500 washing cycles takes a lot of time to carry out the test. Proposal: 300 washing cycles is more realistic to keep costs and timing under control.

Comments from Nordic Ecolabelling

Thank you for your input.

Nordic Ecolabelling understand that it is time consuming to do the washing cycles. Based on your and others' comments regarding concerns about the cost and time, and proposals to lower the numbers of washing cycles, the requirement is adjusted to 300 washes for products for professional use and 100 for products for domestic use. However, if claimed that the product is durable after more washes than stated above, then the requirement must be fulfilled for this number of washes.

Ecolab Deutschland

The requirement 043 and the other related requirements should be deleted. It is not possible to define a specific long-life stability for cleaning textiles.

There are too many parameters which can influence the durability, e.g.:

- Washing procedure
- Washing detergents
- Washing machine
- Water quality onsite
- Drying method

The other challenge is to define the end of the service life. Each supplier defines its own criteria for life cycle and the customer will use in general the cleaning textiles as long as possible and very often longer than recommended.

Comments from Nordic Ecolabelling

Thank you for your input.

Quality of the product are an important part of the environmental impact in the products life cycle, and therefore also important that Nordic Swan Ecolabel have requirements for quality.

It is true that several parameters can affect the durability of the product, and also there is no common definition for service life or durability of microfibre products. However, several producers of microfibre products use numbers of washes as a way to show the durability of the products. Therefore, it is decided in the criteria to use numbers of washes combined with subsequent testing for removal of dust and dirt (O44) and if applicable assessment of hygienic conditions (measurement of quantities of micro-organisms (O45)) as an indicator for the durability and service life of the product.

After the consultation the requirement is adjusted to 300 washes for products for professional use and 100 for products for domestic use. However, if claimed that the product is durable after more washes than stated above, then the requirement must be fulfilled for this number of washes.

Weber & Leucht

Comment:

The extended washing cycles 200/500 washes and the performance criteria of O44/45 are not realistically combined in our opinion and are also very cost-intensive to implement. From our laboratory experience, the criteria set in O44/45 cannot currently be met by most products, especially if recycled fibres are used, which will additionally reduce performance. We have evaluated all our tests carried out over the last 10 years and must warn that many products will not meet these combined criteria.

Proposal:

For the professional sector, we recommend keeping the combination of cleaning performance after 50 washes, as in version 2.6. For the field of household application, longevity should be achieved by 25 instead of 10 cycles. Due to the use of recycled fibres, this quality standard is nevertheless demanding and sufficient to make statements about a longevity of the textiles. Another possibility in checking the longevity would be to check for example according to EN ISO 12947-2:2017-03 (Textiles - Determination of the abrasion resistance of fabrics by the Martindale method - Part 2: Determination of specimen breakdown) and to set a minimum value (instead of high number/costs of washes and testing program after washing).

Comments from Nordic Ecolabelling

Thank you for your input.

Nordic Ecolabelling understand that it is time consuming to do the washing cycles. Based on your and others' comments regarding concerns about the cost and time, and proposals to lower the numbers of washing cycles, the requirement is adjusted to 300 washes for products for professional use and 100 for products for domestic use. However, if claimed that the product is durable after more washes than stated above, then the requirement must be fulfilled for this number of washes.

Regarding the method for washing please note that this must be done as describe in appendix 5 in the criteria, and not according to standard EN ISO 6330 (which was required for testing for removal of dust and dirt and assessment of hygienic conditions (measurement of quantities of micro-organisms in generation 2 of the criteria). The washing method described in appendix 5 is more fitted for microfibre products e.g., the washing detergents shall be without soap or zeolites, than EN ISO 6330. This means that washing detergents will not clog and accumulate in the microfiber in the same way as may be the case when EN ISO 6330 is used. This should give a truer picture of the cleaning ability of the products after the numbers of washes described in requirement O43.

Regarding EN ISO 12947-2 (Textiles - Determination of the abrasion resistance of fabrics by the Martindale method - Part 2: Determination of specimen breakdown) this method was examined during the development of the consultation draft of the criteria. But it was assessed that in the case of microfiber cleaning products it was not the most suitable test to do because EN ISO 12947-2 determine the breakdown of the products, but the most important for microfiber cleaning products is the ability to clean.

Wecovi

Appendix 5:

It may be performed by applicant or manufacturer. We feel it would be better and more honest if this can only be done by an independent laboratory.

Comments from Nordic Ecolabelling

Thank you for your input.

Because of the cost for different tests throughout the criteria it is decided that the washing cycles may also be done by the applicant or manufacturer. In addition, the washing cycles are relatively simple to perform. To get information about how the

washing cycles was done a report as described in appendix 5 must always be submitted as documentation.

After the consultation the requirement is adjusted to 300 washes for products for professional use and 100 for products for domestic use. However, if claimed that the product is durable after more washes than stated above, then the requirement must be fulfilled for this number of washes.

Smart Microfiber Systems

Det är väldigt dyrt att göra med att göra tester upp till 500 tvättar. Är ett orimligt högt krav. Vi kommer inte kunna behålla svanen märkning på många av våra produkter med låg försäljning då kostnaden är alldeles för hög. Vi tycker ni ska behålla de tidigare kraven, de är tillräckliga.

Comments from Nordic Ecolabelling

Thank you for your input.

Nordic Ecolabelling understand that it is time consuming to do the washing cycles. Based on your and others' comments regarding concerns about the cost and time, and proposals to lower the numbers of washing cycles, the requirement is adjusted to 300 washes for products for professional use and 100 for products for domestic use. However, if claimed that the product is durable after more washes than stated above, then the requirement must be fulfilled for this number of washes.

Essity Hygiene and Health

We connect back to the comments on required levels of use of recycled fibres in the products. We are of the opinion that increase of durability should be disconnected from the requirement to use of recycled materials.

Comments from Nordic Ecolabelling

Thank you for your input.

Based on your and others' comments regarding proposals to lower the numbers of washing cycles, the requirement is adjusted to 300 washes for products for professional use and 100 for products for domestic use. However, if claimed that the product is durable after more washes than stated above, then the requirement must be fulfilled for this number of washes.

Regarding recycled materials, please see under O8.

Stockholm Städgross

Produkternas hållbarhet är det fler saker som spelar in i det. Tex städning vintertid med grus och slask. Då är städningen tuffare och sliter mer på materialet. Så det viktiga är att verkligen veta att det finns funktion kvar efter x antal tvättar.

Comments from Nordic Ecolabelling

Tak for jeres input.

Det er korrekt, at mange parametre kan påvirke produktets holdbarhed. Flere producenter af mikrofiberprodukter bruger dog antal vaske som en måde at vise produkternes holdbarhed. Derfor er det i kriterierne besluttet at anvende antal vaske kombineret med efterfølgende test for fjernelse af støv og snavs (O44) og hvis relevant

reduktion af mængder af mikroorganismer (O45), som indikator for holdbarhed og levetid for produktet.

Efter høringen er kravet blevet justeret til 300 vaske for professionelle produkter og 100 for forbruger produkter, men mindre der claimes højere holdbarhed.

O44 Removal of dust and dirt

Upphandlingsmyndigheten

I det här kravet finns nivåer för hur mycket smuts som ska tas bort med mikrofiber dukar specificerat. Det kommer ett tillägg om ”övriga produkter”. Där står det följande:

For other products than cloth, pad or mop Nordic Ecolabelling shall be contacted regarding which level of dust and dirt removal that shall be fulfilled.

Denna text är inte transparent. Det vill säga det är svårt att på förhand veta hur en produkt som faller inom ”övrigt” ska testas och vad som krävs av den för att den ska anses vara tillräckligt effektiv. I listan ovan över krav som finns i LOU finns det bland annat ett objektivitetskrav och ett tillgänglighetskrav. Det innebär är att samtliga krav i märkningen ska vara tydliga och objektivt kontrollerbara samt att kriterierna ska finnas öppet tillgängliga. Om det finns bakomliggande parametrar hur olika produkter inom ”övrigt” ska bedömas, så vore det bättre att de framgick i kravet.

Comments from Nordic Ecolabelling

Tak for jeres input.

Kravet er efter høringen er justeret således, at “øvrige produkter” skal leve op til sammen kravniveau som klude og pads, dvs. minimum 85 % fjernelse af smuds og støv.

Weber & Leucht

Comment:

The criteria describe damp and dry testing only.

Proposal:

Please add wet, damp, and dry because some products in special applications are used wet to prevent exclusion of product concepts.

Comments from Nordic Ecolabelling

Thank you for your input.

We agree and “wet” use method is now added in the criteria.

Essity Hygiene and Health

To test the product after 500 washes can only work if the 500 wash cycles have been performed without any use activity in between. Otherwise, the test will very time consuming if a reasonable use situation is carried through before each wash.

Comments from Nordic Ecolabelling

Thank you for your input.

The wash cycles shall be done without any use activity between the washes.

O45 Assessment of hygienic conditions (measurement of quantities of micro-organisms)

Weber & Leucht

Comment:

The set limit of at least 99% is a stricter requirement, which was chosen too high at our opinion, especially if criteria are set for recycled and bio-based fibres.

Proposal:

According to our findings, the required reduction of at least 99% is often not achievable for mops and can only be achieved for cloths under favourably selected test parameterizations (surface, cloth moisture, execution of the wiping movement). We therefore recommend setting the minimum requirement at 95% or lower.

Comments from Nordic Ecolabelling

Thank you for your input.

We have decided to follow your proposal of a requirement of at least 95% reduces of the amount of micro-organisms for all products. 95% reduction is still a high level, and the requirement is still significantly tightened compared to generation 2 of the criteria.

Wecovi

Both cloths and mops 99% cfu:

In the old criteria it was 85% for cloths and 70% for mops. We agree this must be higher, but we would suggest dividing cloths and mops:

- Cloth 99%
- Mop 95%

Comments from Nordic Ecolabelling

Thank you for your input.

We have decided to set the level to at least 95% reduces of the amount of micro-organisms for all products. 95% reduction is still a high level, and the requirement is still significantly tightened compared to generation 2 of the criteria.

Essity Hygiene and Health

It must be demonstrated that the product reduces the number of micro-organisms by at least 99% (cfu = colony forming units) after at least 200/500 washes, see requirement O43.

Comment:

We see difficulties in performing this test. Only washing repeatedly 500 times and then measure the quantities of micro-organisms will not be the same as actually using and washing the towel 500 times. Such a test would be impossible in terms of need for resources and time to perform it.

Keep the level in the existing level with 85% in 50 washes, since according to the background document the level of reduction varies depending on application, i.e., which surfaces that are cleaned.

Comments from Nordic Ecolabelling

Thank you for your input.

Please see under O43 regarding lowering of the numbers of washing cycles after the consultation.

We have also lowered the reduction of the amount of micro-organisms from 99% as proposed in the consultation to at least 95%. Feedback from several is that the level of 85% in generation 2 of the criteria is too low.

O46 Abrasion

Ecolab Deutschland

To give a guaranty of “non abrasion” will cause a lot of discussion between the supplier of cleaning textiles and his customers.

It is possible to evaluate with special test methods if a textile will damage a specific surface, but here are too many kinds of surfaces and there are too many parameters, which can influence the abrasion of a textile during its life cycle (e.g., washing procedure).

Here it is very important to give the customer washing and cleaning instructions on hand to avoid abrasion e.g., to use only special cloths in a certain colour for sensitive surfaces, do not mix and wash them with other textiles and so on.

Comments from Nordic Ecolabelling

Thank you for your input.

The requirement is that the product, must not cause damage to the cleaned surface when used as recommended. This means that test shall only be performed on the type of surfaces that are recommended for the product.

Regarding customer washing and cleaning instructions, those are found in the requirement regarding labelling where the following information must be supplied together with the product:

- *Information about that the product must be used without cleaning chemicals.*
- *Information about that the product contain microfibre materials.*
- *Information on the surfaces for which the product is designed.*
- *Laundry instructions with directions regarding care as well as recommended and maximum washing temperatures.*

Smart Microfiber Systems

Ok

Comments from Nordic Ecolabelling

Thank you for your input.

O47 Absorption

No comments in the consultation.

O48 Loss of fibre fragments

Vileda Professional / Freudenberg

TMC is focusing on outdoor fashion. Cleaning textiles cannot be compared with outdoor fashion. Please use the expertise institutes focusing on cleaning textiles, such as Weber&Leucht.

Comments from Nordic Ecolabelling

Thank you for your input.

Nordic Ecolabelling agrees that methods specifically adapted to cleaning textiles are preferable. However, it is crucial that the test methods we require are publicly available and can be offered by several labs. Weber & Leucht has after the consultation made their method for testing of fibre fragment loss from microfibre cleaning textiles available for Nordic Ecolabelling, so we will require testing with that method and also set requirement to a minimum rating according to Weber & Leucht's rating scale.

Miljøstyrelsen, Danmark

Nordisk Miljømærkning stiller fokus på et vigtigt område, idet, der ses en stigning i brugen af syntetiske materialer og medfølgende tab af mikroplastpartikler. Tab af microfibre (mikroplast) under selve brugsfasen vil muligvis kunne mindskes, hvis der var krav om at produktet med microfibre blev vasket i et vaskeri med filtrering af vaskevandet. Flere studier peger på at tekstilerne afgiver mikroplast, særligt i starten (fremstillingsprocessen) og i løbet af den "første vask" som vi forbrugere laver. Muligvis skal kravet allerede stilles ved selve produktionen af mikrofibermetervaren og før færdiggørelse af selve det færdige produkt.

Comments from Nordic Ecolabelling

Thank you for your input.

We agree that filtering of the wastewater from washing machines is important, and in Nordic Swan Ecolabelled cleaning services filters that capture microplastics from washing machines are rewarded.

After the consultation the test method has changed to method developed by Weber & Leucht, which is specifically developed to cleaning textiles and also a requirement to a minimum rating according to Weber & Leucht's rating scale was set. Testing of loss of fibre fragments from microfibre cleaning textiles is set for the final product. Nordic Ecolabelling will follow the development of knowledge and possibly future test methods and standards for emissions from the production facilities and assesses whether requirements regarding microplastics in future generations should be expanded.

Weber & Leucht

Comment:

The criteria is based on standards that are not suitable for cleaning textiles. The mentioned ISO 4484-1 was developed for textiles in the fashion, outdoor and sports sectors and the scope of the mentioned standards doesn't cover cleaning textiles specifically. For the standards mentioned, there is currently insufficient experience as to whether reproducible results can be achieved at all for common cleaning textiles. Mop textiles, for example, consist of very heavy velour fabrics and knitted fabrics. We have carried out tests for this purpose and consider both of the standards mentioned above to be unsuitable for this product group due to the lack of verifiability of the results. In addition, available proficiency tests have only been carried out with a few laboratories and the results are currently insufficient from our point of view. Moreover, material loss due to washing is not to be equated with microplastic release and without the existing standardization of suitable and proven analytical methods for the identification of microplastics from textile sources, the

application of this requirement does not provide any direct advantages. In addition, there is a lack of differentiation in the selected standards. Almost all textiles (whether stable, unstable, woven or knitted or nonwoven) achieve % values in a very low range. We currently explain that microfibers reabsorb and hold a large part of the rinsed fibre particles during the test, as the cleaning textiles act like filters in the containers. Thus, only a small fraction of the weight loss is recorded, and the majority of the fibre fragments remain in the textiles and are not measured.

Proposal:

Our laboratory has dealt extensively with the testing of microplastic emission by cleaning textiles, evaluated corresponding methods and created a first applicable standard for cleaning textiles with the MLCIndex. The MLC-Index is supported by most certificate holders and there are already collected data available, which ranges from the different steps of textile production (e.g. spinning, knitting, weaving, finishing, sewing...) of textiles to the application (cleaning, washing and drying). It is therefore incomprehensible to us that a standard should be used that has not yet been tested for cleaning textiles and that the data will be forwarded to a third-party consortium without knowing whether the test methods are applicable at all. We recommend that the criteria for microplastics from cleaning textiles should only be included if both a lifetime test program consisting of washing and the important step of drying and especially abrasion is available and a suitable method for identifying microplastics from textiles as a European standard is available (for example prEN ISO 4484-2). In addition, the MLC-Index has the advantage that the weight of the textiles is included in the result. Lightweight products with low emissions thus achieve advantages over heavy products with comparable emissions. Mass loss in wt.% is not expedient for the evaluation of emissions and cleaning textiles can be vary between 50 g/m² to 2,000 g/m². We therefore recommend not to include a new requirement and not to collect data to set a limit until sufficiently reliable and proven testing method for measurement and rating for the special product group cleaning textiles are available and until European standards for measuring the emission of cleaning textiles are published and can be applied

Comments from Nordic Ecolabelling

Thank you for your input.

Nordic Ecolabelling agrees that methods specifically adapted to cleaning textiles are preferable. However, it is crucial for Nordic Ecolabelling that the test methods we require are publicly available and can be offered by several labs. Now after the consultation Weber & Leucht has made their method available for Nordic Ecolabelling, we will require testing with that method. We will also set requirement to a minimum rating according to Weber & Leucht's rating scale.

Wecovi

We are very happy Nordic Ecolabelling gives attention to microplastics and we also understand this belongs in the 083 criteria. However, we believe we need more knowledge about microplastics first, before making a criteria out of it. Now licensees are obliged to show (and pay for) a test report, but there is no requirement on maximum loss of something to comply with. We do not see the added value of the test report!

Nordic Ecolabelling encourages that test results be sent to TMC as a basis for developing a rating system.

Why not Weber and Leucht with MLC Index?

Comments from Nordic Ecolabelling

Thank you for your input.

Nordic Ecolabelling agrees that methods specifically adapted to cleaning textiles, with the possibility to set a threshold for loss of fibre fragments, are preferable. However, it is crucial for Nordic Ecolabelling that the test methods we require are publicly available and can be offered by several labs. Weber & Leucht has after the consultation made their method for testing of fibre fragment loss from microfibre cleaning textiles available for Nordic Ecolabelling, so we will require testing with that method and also set requirement to a minimum rating according to Weber & Leucht's rating scale.

The Microfibre Consortium

1) Fabrics, included with more than 10% by weight in the finished textile part and consisting of at least 90% by weight of synthetic fibres, shall be tested for loss of fibre fragments according to either the TMC test method or standard ISO/DIS 4484-1:

- We would propose replacing the term 'Fabric' at the start of this statement with 'Products' to be clearer and to not exclude any non-woven (non-fabric based) material.
- Although this ecolabeling proposal is targeted at microfibre cleaning cloths, TMC does not recommend singling out synthetic fibres. TMC holds the largest global data set of primary research which demonstrates that both natural and synthetic fabrics / fibres have the propensity to shed, causing impact to the environment. This research is substantiated with scaling data currently held within the Microfibre Data Portal (The Microfibre Data Portal houses both test data results (using The TMC Test Method) and the underpinning technical specifications. Signatories to The Microfibre 2030 Commitment upload their results to the Data Portal to support data analysis of the root causes of fibre fragmentation. Learnings from the analysis will be released in the form of documents and resources disseminated through the Microfibre Knowledge Hub).
- TMC are aware that there is a key misconception that natural and man-made cellulosic fibres are less impactful environmentally due to their natural biodegradability. However, once processed their chemical structures are altered and their ability to breakdown naturally is greatly diminished. Chemical and dye finishes compound this issue. Further details and TMC's position on this can be found in our recent [Biodegradability Positioning Statement](#).
- TMC's proposal would be:
 - o Products, included with more than 10% by weight in the finished textile part made up of any fibre type (synthetic or natural), shall be tested for loss of fibre fragments according to either the TMC test method or standard ISO/DIS 4484-1.

2) Nordic Ecolabelling can insert a limit value in the requirement when a relevant rating system with applicable limit values has been developed:

- TMC fully support this and would be happy to provide guidance as our Microfibre 2030 Roadmap progresses, including milestones of; fibre fragmentation baselining (2023) and TMC’s global rating system (2025).

3) Nordic Ecolabelling encourages that test results be sent to TMC (The Microfibre Consortium) as a basis for developing a “rating system.”:

- TMC wishes to thank Nordic Ecolabeling for signposting to TMC and requests that a slight amendment is included as provided below:

- o Nordic Ecolabelling encourages that test results be sent to TMC (The Microfibre Consortium) as a basis for supporting short-term direction for product development changes and medium-term development a global rating system.

Conclusion:

TMC wishes to support Nordic Ecolabelling in their proposal and offer onward support to ensure cross-industry alignment and uptake.

TMC suggest some minor amendments, namely highlighting the need to identify both natural and synthetic fibres as a potential risk. This is important in order to ensure a ‘no regrets’ approach is taken in regard to the wider sustainability agenda.

TMC see further opportunities to support the microfibre cleaning products sector beyond labelling requirements. For example, through guiding proactive on-the-ground product development changes.

TMC would welcome an opportunity for introductions.

Comments from Nordic Ecolabelling

Thank you for your input.

We agree that it is important to collect data also for natural fibres. However, we are more concerned about the synthetic fibres because they generally break down slower and chemicals and bacteria more easily stick to their surface. We recognize that also natural fibres can carry harmful chemicals from the production, but because Nordic Swan Ecolabelled textiles must meet strict requirements on chemicals this is not such a big issue for us. We have received comments suggesting that the TMC method and the ISO 4484-1 are not specifically adjusted to microfibre cleaning textiles. Nordic Ecolabelling believes that methods specifically adapted to cleaning textiles, with the possibility to set a threshold for loss of fibre fragments, are preferable. However, it is crucial for Nordic Ecolabelling that the test methods we require are publicly available and can be offered by several labs. Weber & Leucht has after the consultation made their method for testing of fibre fragment loss from microfibre cleaning textiles available for Nordic Ecolabelling, so we will require testing with that method and also set requirement to a minimum rating according to Weber & Leucht’s rating scale.

Smart Microfiber Systems

TMC test method or standard ISO/DIS 4484-1 är utvecklat för test av kläder gjorda av microfiber. Microfiber från kläder skiljer sig en del från microfiber för rengöring. Vi ser gärna att vi avvaktar med krav inom dessa kriterier tills det har utvecklats en EU standard för testning av alla sorters textilier som släpper mikro partiklar: Vi har gjort en hel del tester med Weber & Leucht lab i Tyskland sedan 2016. Deras test kallas för MLC index och vi tycker att det är en metod som fungerar.

Comments from Nordic Ecolabelling

Thank you for your input.

Nordic Ecolabelling agrees that methods specifically adapted to cleaning textiles, with the possibility to set a threshold for loss of fibre fragments, are preferable. However, it is crucial for Nordic Ecolabelling that the test methods we require are publicly available and can be offered by several labs. Weber & Leucht has after the consultation made their method for testing of fibre fragment loss from microfibre cleaning textiles available for Nordic Ecolabelling, so we will require testing with that method and also set requirement to a minimum rating according to Weber & Leucht's rating scale.

4.3.5 Section 6, Instructions, and labelling

After the consultation requirements O49 Instruction and O50 Labelling have been merged. The new requirement text is:

Regarding customer washing and cleaning instructions, those are found in the requirement regarding labelling where the following information must be supplied together with the product:

- Information about that the product must be used without cleaning chemicals.
- Information about that the product contain microfibre materials.
- Information on the surfaces for which the product is designed.
- Laundry instructions with directions regarding care as well as recommended and maximum washing temperatures.

O49 Instructions

No comments in the consultation.

O50 Labelling

No comments in the consultation.

4.3.6 Section 7, Social and ethical requirements

O51 Fundamental principles and rights at work

Stockholm Städgross

Krav O51 uppfyller vår tillverkare redan. Och har ett BSCI audit rapport.

Comments from Nordic Ecolabelling

Thank you for your input.

After the consultation the requirement has been changed. Now certification is not needed, but the licensee should meet the due diligence expectations for human rights laid out in the OECD Guidelines for Multinational Enterprises, which are aligned with that of the United Nations Guiding Principles on Business and Human Rights (UNGPs) and supplement the due diligence with a third-party audit of the manufacturing site(s).

Wecovi

SA8000 certificate or other third-party verification:

This means a handful of companies are obliged to obtain this rather expensive SA8000 certificate. We suggest the UN Global Compact. This is free and holds the same requirements.

E.g., a BSCI audit report:

A BSCI audit report leads to a score between A and E. What will be the minimum score, according to Nordic Ecolabelling?

Comments from Nordic Ecolabelling

Thank you for your input.

After the consultation the requirement has been changed. Now certification is not needed, but the licensee should meet the due diligence expectations for human rights laid out in the OECD Guidelines for Multinational Enterprises, which are aligned with that of the United Nations Guiding Principles on Business and Human Rights (UNGPs) and supplement the due diligence with a third-party audit of the manufacturing site(s).

Smart Microfiber Systems

Ok

Comments from Nordic Ecolabelling

Thank you for your input.

After the consultation the requirement has been changed. Now certification is not needed, but the licensee should meet the due diligence expectations for human rights laid out in the OECD Guidelines for Multinational Enterprises, which are aligned with that of the United Nations Guiding Principles on Business and Human Rights (UNGPs) and supplement the due diligence with a third-party audit of the manufacturing site(s).

Essity Hygiene and Health

Certification: The applicant shall submit either a valid certificate of a SA8000 certification, or other third-party verification of compliance with the requirement. This may be a BSCI audit report.

Comment:

The requirement on certification should be based on a risk assessment, according to established methods, such as OECD guidelines for multinational corporations. Also, SA8000 certificate is a very strict requirement so it is very important that also types of verification like an BSCI or SMETA audit is accepted as verification.

Comments from Nordic Ecolabelling

Thank you for your input.

After the consultation the requirement has been changed. Now certification is not needed, but the licensee should meet the due diligence expectations for human rights laid out in the OECD Guidelines for Multinational Enterprises, which are aligned with that of the United Nations Guiding Principles on Business and Human Rights (UNGPs) and supplement the due diligence with a third-party audit of the manufacturing site(s).

4.3.7 Section 8, Licence maintenance

O52 Control and assessment of suppliers

Smart Microfiber Systems

Ok

Comments from Nordic Ecolabelling

Thank you for your input.

O53 Customer complaints

No comments in the consultation.

O54 Traceability

No comments in the consultation.

4.3.8 Appendices

Appendix 5

Weber & Leucht

I noticed in Appendix 5 that the ISO 15797 standard for professional laundry is mentioned there. However, this standard is not mentioned in O41 or O 45 directly.

Additional Comment EN ISO 15797 Appendix 5:

Our laboratory is accredited for ISO 15797 standard, and we therefore have experience. The machines used require a high material load of 24 to 27 kg and the standard is mainly used for workwear which is treated in large laundries. The selected machine type according to the ISO 15797 standard is therefore inappropriate for the service life test of cleaning textiles in many cases and extremely expensive to carry out. In professional cleaning, smaller professional machines are often used (6 kg to 13 kg). It is therefore good that these machines should also be accepted.

Proposal:

Delete the reference to ISO 15797 to prevent confusion. The European machine type of ISO 6330 or other professional machines of larger loads are suitable for lifetime simulation for professional textiles as well, provided that specific criteria of professional laundry are taken into account and stated in the washing protocol (e.g., detergent and, if necessary, disinfection system...).

Comments from Nordic Ecolabelling

Thank you for your input.

In O41 standard EN ISO 6330 must be used, and in O45 washing must be done as described in appendix 5 (as referred to in O43). This means, that the washing shall not be done according to standard ISO 15797, but the washing machine types described in ISO 15797 may be used when doing washing as described in appendix 5.

It seems that professional washing machines are the most used, and therefore, we have followed your suggestion and have delete the reference to ISO 15797 to prevent

confusion. This means that washing machine designed for professional washing or according to EN ISO 6330 must be used.

5 Comments to the background document

Wecovi

Page 5, statement:

“It must be clearly demonstrated that none of the 11 groups of substance from criteria’s restricted substances list have been used. This list is aligned with Greenpeace’s Detox My Fashion campaign”.

Feedback:

How can this be demonstrated?

Page 5, statement:

Surface treatment of tools with antibacterial substances and nanomaterials have been banned.

Feedback:

Interesting. Why?

Page 10, statement:

Generally, the use of recycled fibres reduced the consumption of energy and resources.

Feedback:

We are very curious what source Nordic Ecolabelling bases this on? There are also studies that expose scenarios under which reuse, and recycling may not be beneficial, for example in cases of low replacement rates, if recycling processes are powered by fossil energy, or if the avoided production processes are relatively clean. And it costs energy and resources to collect and recycle as well.

Page 15, statement:

Nordic can subsequently insert a limit value in the requirement during the period of validity of the criteria, when a relevant rating system with applicable limit values has been developed.

Feedback:

What happens when this new requirement is being inserted? Licensed products get x time to test?

Page 15, statement:

“... when a relevant rating system with applicable limit values has been developed.”

Feedback:

What about the MLC Index of Weber and Leucht?

Page 77, table:

O34 and O35 are missing.

Comments from Nordic Ecolabelling

Thank you for your input.

Regarding Page 5, statement, 11 groups of substance:

This can be documented by submitting the requested documentation from the requirements (O17-O25) in the sections for textile chemicals in the criteria.

Regarding Page 5, statement, Surface treatment of tools with antibacterial substances and nanomaterials:

Biocidal products and antibacterial products are not desirable in Nordic Swan Ecolabelled products. Frequent use of antibacterial substances in products where they are not needed may contribute to increased resistance in bacteria and the eradication of necessary bacteria, and Nordic Ecolabelling does not wish to contribute to this. Nano silver is harmful for the aquatic environment. These substances are increasingly being added to products – everything from textiles to kitchen equipment. Particular attention is being paid to nanometals such as nano silver and nano copper since they occur in many products.

These nanomaterials are added to achieve an antibacterial effect. There has been particular concern that emissions of nano silver into wastewater and other dispersal could eliminate desirable bacteria and cause resistance in bacteria.

Regarding Page 10, statement, The use of recycled fibres reduced the consumption of energy and resources:

Nordic Ecolabelling wishes to support a circular economy by encouraging the use of recycled materials.

Substantial environmental potential is expected in the future with regard to reduce resource consumption and CO2 emissions (Sandin, G, Environmental impact of textile reuse and recycling – A review, Journal of Cleaner Production Volume 184, 20 May 2018, Pages 353-365), if the textile industry is able to convert textile waste into new raw materials. Nordic Ecolabelling wishes to stimulate increased use of recycled materials in textile production, thus avoiding the use of virgin fossil materials. The review “Environmental impact of textile reuse and recycling - A review” (Sandin, G, Environmental impact of textile reuse and recycling – A review, Journal of Cleaner Production Volume 184, 20 May 2018, Pages 353-365) describes that there is strong support for claims that textile reuse and recycling in general reduce environmental impact compared to incineration and landfilling, and that reuse is more beneficial than recycling. Benefits mainly arise because of the assumed avoidance of production of new products. There are also scenarios under which recycling may not be beneficial, for example in cases where the avoided production processes are relatively clean.

Regarding Page 15, statement, a relevant rating system:

Regarding MLC Index, please see answer under O48.

Regarding “What happens when this new requirement is being inserted? Licensed products get x time to test”: Licensed products must be tested, but as it is now there is no limit value that must be fulfilled. When a relevant rating system with applicable limit values has been developed, then a limit value may be inserted. At this point products that do not fulfil the limit value will be given a time period to adjust the products and do retesting to show fulfilment of the limit value.

Regarding Page 77, table:

Now O34 and O35 is added in the table.