

## Appendix 2 Declaration from the manufacturer/supplier of the raw material to the hand dishwashing detergent

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

This declaration is based on the best available knowledge at the time of the application, including test results. If new information or scientific findings become available, please inform Nordic Ecolabelling and submit an updated declaration. For suppliers: If you do not have knowledge about the complete composition of the raw material/ingredient, you are obliged to obtain this information from the manufacturer.

<b>Manufacturer/Supplier</b>
<b>Trade name of the raw material:</b>

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

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

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

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

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

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

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

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

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

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

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

Please list the ingoing substances in the raw material in the table below and indicate 'yes' or 'no' as to whether each substance is regarded as a UVCB substance.

If the raw material contains impurities that are listed under excluded substances or has any of the classifications mentioned in this appendix, write the amount in the box at the end of the appendix. The manufacturer of the Nordic Swan Ecolabelled product is responsible for calculating compliance with the requirements of the criteria.

Name of raw material ingredient	Chemical name	CAS No.	Amount in weight %	Function of the raw material/ingredient	Suggested DID No.	UVCB substance? State Yes/No

**Please note that:**

The DID-list is available from the Nordic Ecolabelling web pages,

DID-list Part A: [https://www.svanen.se/49baaa/siteassets/att-svanenmarka/kriterier/did-listan/did\\_list\\_2023.pdf](https://www.svanen.se/49baaa/siteassets/att-svanenmarka/kriterier/did-listan/did_list_2023.pdf)

DID-list part B: [https://www.svanen.se/49bfd4/siteassets/att-svanenmarka/kriterier/did-listan/didlist\\_2023\\_partb.pdf](https://www.svanen.se/49bfd4/siteassets/att-svanenmarka/kriterier/did-listan/didlist_2023_partb.pdf)

Substances that are defined as surfactants according to Detergent Regulation (EC) No 648/2004, must always be reported with the function "surfactant".

The information in this declaration is internally shared with certification personnel in Nordic Ecolabelling to be used in evaluation of applications of chemical technical products.

O4 Certified raw materials from oil palms	Yes	No
Does the raw material contain palm oil or palm kernel oil? This includes by-products, residues, and waste fractions from palm oil industries, such as palm fatty acid distillate and palm effluent sludge.	<input type="checkbox"/>	<input type="checkbox"/>
If yes, is this palm oil/palm kernel oil RSPO certified? What is the traceability level? Tick below and state the certificate/licence number: _____	<input type="checkbox"/>	<input type="checkbox"/>
No traceability		<input type="checkbox"/>
Identity Preserved		<input type="checkbox"/>
Segregated		<input type="checkbox"/>
Mass Balance		<input type="checkbox"/>
O5 Classification of ingoing substances	Yes	No
Does the raw material contain ingoing substances or impurities classified with any of the hazard phrases below? Incl. all classification variants. For example, H350 also covers classification H350i.		
H420 – Ozone	<input type="checkbox"/>	<input type="checkbox"/>
H372 – STOT RE 1	<input type="checkbox"/>	<input type="checkbox"/>
H334 – Resp Sens. 1, 1A or 1B	<input type="checkbox"/>	<input type="checkbox"/>
H317 – Skin Sens. 1, 1A or 1B	<input type="checkbox"/>	<input type="checkbox"/>
H350 – Carc 1A or 1B	<input type="checkbox"/>	<input type="checkbox"/>
H351 – Carc 2	<input type="checkbox"/>	<input type="checkbox"/>
H340 – Muta 1A or 1B	<input type="checkbox"/>	<input type="checkbox"/>
H341 – Muta 2	<input type="checkbox"/>	<input type="checkbox"/>
H360 – Repr 1A or 1B	<input type="checkbox"/>	<input type="checkbox"/>

H361 – Repr 2	<input type="checkbox"/>	<input type="checkbox"/>
H362 – Lact.	<input type="checkbox"/>	<input type="checkbox"/>
EUH380 – ED HH 1	<input type="checkbox"/>	<input type="checkbox"/>
EUH381 – ED HH 2	<input type="checkbox"/>	<input type="checkbox"/>
EUH430 – ED ENV 1	<input type="checkbox"/>	<input type="checkbox"/>
EUH431 – ED ENV 2	<input type="checkbox"/>	<input type="checkbox"/>
EUH440 – PBT	<input type="checkbox"/>	<input type="checkbox"/>
EUH441 – vPvB	<input type="checkbox"/>	<input type="checkbox"/>
EUH450 – PMT	<input type="checkbox"/>	<input type="checkbox"/>
EUH451 – vPvM	<input type="checkbox"/>	<input type="checkbox"/>
<b>O6 + O7: Excluded substances</b>		
<b>Does the raw material contain any of the following as ingoing substances or impurities?</b>	<b>Yes</b>	<b>No</b>
Alkylphenols (AP) (e.g. butylated hydroxy anisole (BHA, CAS No. 25013-16-5), butylated hydroxytoluene (BHT, CAS No. 128-37-0), alkylphenol ethoxylates (APEOs), and other alkylphenol derivates (APD)	<input type="checkbox"/>	<input type="checkbox"/>
Amphoacetate derivatives of N-hydroxyethyl imidazolines (EC No. 271-792-5, 271-794-6, 931-291-0, 938-645-3, 942-589-5, 943-154-2, 944-415-3, 946-565-5, 947-998-2)	<input type="checkbox"/>	<input type="checkbox"/>
Benzalkonium chloride, such as CAS No. 8001-54-5 and CAS No. 63449-41-2	<input type="checkbox"/>	<input type="checkbox"/>
Bisphenols and bisphenol derivatives, defined as 34 bisphenols identified by ECHA for further EU regulatory risk management due to known or potential endocrine disruption reproductive toxicity. <i>EC/List No. 201-245-8 (BPA), 201-025-1 (BPB), 401-720-1 (4,4'-Isobutylethylenediphenol), 216-036-7 (BPAF) and its 8 salts (278-305-5; 425-060-9; 443-330-4; 468-740-0; 469-080-6; 479-100-5; 943-265-6; 947-368-7), 201-250-5 (BPS), 201-240-0 (BPC), 204-279-1 (TBMD), 201-618-5 (6,6'-di-tert-butyl-4,4'-butylidenedi-m-cresol), 242-895-2, 248-607-1, 405-520-5 (D8), 217-121-1 (DAB), 227-033-5 (TMBPA), 210-658-2 (BPF), 411-570-9, 277-962-5 (contains BPS), 500-086-4 (contains BPA), 500-263-6 (contains BPA), 500-607-5 (contains BPA), 701-362-9, 904-653-0 (contains BPA), 908-912-9 (contains BPF), 926-571-4 (contains BPA), 931-252-8 (contains BPA), 941-992-3 (contains BPS), 943-503-9 (contains BPA)</i>	<input type="checkbox"/>	<input type="checkbox"/>
Ethylenediamine tetraacetate (EDTA, CAS No. 60-00-4) and its salts and Diethylenetriamine pentaacetate (DTPA, CAS No. 67-43-6) and its salts	<input type="checkbox"/>	<input type="checkbox"/>
Linear alkylbenzene sulphonates (LAS)	<input type="checkbox"/>	<input type="checkbox"/>
Methyldibromo glutaronitrile (MG, CAS No. 35691-65-7)	<input type="checkbox"/>	<input type="checkbox"/>
Microplastics Does the raw material contain polymers? Does the raw material contain polymers that are defined as microplastics? If the raw material contains polymers that are not defined as microplastics, please state how the polymers are excluded from the definition ( include test methods and results if relevant):          <i>Synthetic polymer microparticles as defined in REACH Regulation ((EC) No 1907/2006), Annex XVII, Entry no. 78: Synthetic polymer microparticles: polymers that are solid, and which fulfil both of the following conditions:</i> <i>a) are contained in particles and constitute at least 1% by weight of those particles; or build a continuous surface coating on particles.</i> <i>b) at least 1% by weight of the particles referred to in point (a) fulfil either of the following conditions:</i> <i>(i) all dimensions of the particles are equal to or less than 5 mm.</i>	<input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>

<p>(ii) the length of the particles is equal to or less than 15 mm and their length to diameter ratio is greater than 3.</p> <p>The following polymers are excluded from this designation:</p> <p>a) polymers that are the result of a polymerisation process that has taken place in nature, independently of the process through which they have been extracted, which are not chemically modified substances.</p> <p>b) polymers that are biodegradable as proved in accordance with Appendix 15 [to REACH, Regulation (EC) No 1907/2006].</p> <p>c) polymers that have a solubility greater than 2 g/L as proved in accordance with Appendix 16 [to REACH, Regulation (EC) No 1907/2006].</p> <p>d) polymers that do not contain carbon atoms in their chemical structure.</p> <p>N.B. The following "Conditions of restriction" paragraphs apply: 1 (concentration limit in mixtures), 2 (definitions), 3 (particle size limits). The remaining points do not apply, e.g. 4 (Paragraph 1 shall not apply to the placing on the market of:), e.g. 4(a) "synthetic polymer microparticles, as substances on their own or in mixtures, for use at industrial sites", 5 (derogations), e.g. 5 (b) "synthetic polymer microparticles the physical properties of which are permanently modified during intended end use in such a way that the polymer no longer falls within the scope of this entry".</p>		
<p>Nanomaterials/-particles</p> <p>Defined according to the EU Commission Recommendation on the Definition of Nanomaterial (2022/C 229/01): 'Nanomaterial' means a natural, incidental or manufactured material consisting of solid particles that are present, either on their own or as identifiable constituent particles in aggregates or agglomerates, and where 50 % or more of these particles in the number-based size distribution fulfil at least one of the following conditions:</p> <p>a) one or more external dimensions of the particle are in the size range 1 nm to 100 nm;</p> <p>b) the particle has an elongated shape, such as a rod, fibre or tube, where two external dimensions are smaller than 1 nm and the other dimension is larger than 100 nm;</p> <p>c) the particle has a plate-like shape, where one external dimension is smaller than 1 nm and the other dimensions are larger than 100 nm.</p>	<input type="checkbox"/>	<input type="checkbox"/>
Nitro musks and polycyclic musk compounds	<input type="checkbox"/>	<input type="checkbox"/>
Nitrilo triacetic acid (NTA, CAS-no. 139-13-9), and its salts	<input type="checkbox"/>	<input type="checkbox"/>
Organic chlorine compounds, hypochlorites and hypochlorous acid	<input type="checkbox"/>	<input type="checkbox"/>
PBT and vPvB as defined in REACH Annex XIII, including those under ECHA PBT assessment <a href="https://echa.europa.eu/da/pbt">https://echa.europa.eu/da/pbt</a>	<input type="checkbox"/>	<input type="checkbox"/>
Per- and polyfluoroalkyl substances (PFAS)	<input type="checkbox"/>	<input type="checkbox"/>
PFAS is defined as any substance that contains at least one fully fluorinated methyl (CF <sub>3</sub> -) or methylene (-CF <sub>2</sub> -) carbon atom (without any H/Cl/Br/I attached to it)		
Phosphate, phosphonate, phosphonic acid and phosphoric acid	<input type="checkbox"/>	<input type="checkbox"/>
<p>Potential or identified endocrine disruptors, listed in any of the following "<a href="#">Endocrine Disruptor Lists</a>" List I, II and III</p> <p>Note: Substances moved to "Substances no longer on list" and not present on List I-III, are no longer excluded, except for those on sublist II where concern remains. Nordic Ecolabelling will assess these on a case-by-case basis.</p>	<input type="checkbox"/>	<input type="checkbox"/>
Quaternary ammonium compounds, that are not readily aerobic biodegradable such as DTDMAC (CAS No. 61789-80-8), DSDMAC (CAS No. 107-64-2), DHTDMAC (CAS No. 61789-72-8) and DADMAC (CAS No. 7398-69-8)	<input type="checkbox"/>	<input type="checkbox"/>
Substances on the REACH Candidate list of SVHC substances <a href="https://www.echa.europa.eu/candidate-list-table">https://www.echa.europa.eu/candidate-list-table</a>	<input type="checkbox"/>	<input type="checkbox"/>
<b>O8 Fragrance allergens</b>	<b>Yes</b>	<b>No</b>
Does the raw material contain fragrances (incl. plant extracts)?	<input type="checkbox"/>	<input type="checkbox"/>
Have fragrances been added in line with IFRA guidelines? (IFRA, International Fragrance Association, <a href="http://www.ifraorg.org/">www.ifraorg.org/</a> )	<input type="checkbox"/>	<input type="checkbox"/>
<p>Does the fragrance contain BHT? (see O7)</p> <p>If yes, please state the amount (ppm or % by weight): _____</p>	<input type="checkbox"/>	<input type="checkbox"/>

Does the raw material contain fragrance allergens that are judged to be sensitising with the hazard statement H317 and/or H334, or which are listed in Annex III of the Cosmetic Regulation? If yes, please send in perfume specifications.	<input type="checkbox"/>	<input type="checkbox"/>
Does the raw material contain the fragrance allergens oak moss extract ( <i>Evernia prunastri</i> , CAS No. 90028-68-5), tree moss extract ( <i>Evernia furfuracea</i> , CAS 90028-67-4) or HICC (CAS No. 51414-25-6/31906-04-4)?  If yes, please send in perfume specifications.	<input type="checkbox"/>	<input type="checkbox"/>
<b>O9 Preservatives</b>	<b>Yes</b>	<b>No</b>
Does the raw material contain preservatives?  If yes, please state name and log Kow/BCF: _____	<input type="checkbox"/>	<input type="checkbox"/>
<b>O11 Long-term environmental effects</b>	<b>Yes</b>	<b>No</b>
Does the raw material contain ingoing substances classified as environmentally hazardous with H410, H411 and H412?  If yes, please state the amount (% by weight) per classification, and for H410 also state the M-factor: _____	<input type="checkbox"/>	<input type="checkbox"/>

If the answer to any of the above questions regarding ingoing substances or impurities is Yes, please provide the following information for each relevant substance: CAS No. (where possible), chemical name, concentration (in ppm, % by weight or mg/kg). Also state whether the substance is present as an ingoing substance or impurity.

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If the raw material composition changes, a new declaration confirming compliance with the requirements must be submitted to Nordic Swan Ecolabelling.

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