



List of criteria for the assessment of rinse-off products

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DU GRAND-DUCHÉ DE LUXEMBOURG
Ministère de l'Environnement, du Climat
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Introduction – Explanations

Definition of the rinse-off product group

The definition of this product group is based on the EC definition for the *rinse-off* eco label which in principle includes products used for cleaning skin and hair that are not left on the skin or hair.

From an ecological perspective these products are responsible for a large proportion of potentially problematical substances in waste water. The protection of health and safety at work also plays an important part for users since the use of allergenic substances in these products is not uncommon (preservatives, fragrances ...). Since hand soaps are very frequently used, the volume attributable to Luxembourg is not insignificant either. The implementation of the criteria is also intended to lead to a reduction in the volume of waste and to inform the population of the effect of *rinse-off* products on the environment and on health.

Rinse-off includes those cosmetic products that are applied to the skin or hair exclusively or mainly for cleansing purposes. They are washed off or rinsed off immediately after use (in contrast to *leave-on* products).

By *rinse-off* is meant products for private (consumer) and professional use (commercial products).

The following products are covered by these criteria:

- Bath and shower additives (salts, foam, oil, gel, ...)
- Solid soaps, liquid soaps
- Shampoos
- Hair conditioners (washed out again)
- Shaving products (shaving foam, shaving cream, shaving gel and shaving soap).

However they do not cover products categorised as disinfectant or antibacterial (e.g. disinfectant hand soap ...). Nor do they cover toothpaste, moist tissues, makeup remover, shampoos for pets or any *leave-on* products (makeup, body lotion, face creams, eye lotions, lip salves, anti-ageing products, foot creams, ...).



Questionnaire for recording the ingredients of rinse-off products

1) General information

1.1) Manufacturer _____

Address _____

Contact person _____

Telephone no. _____

Fax no. _____

Email _____

Internet _____

1.2) Product name _____

1.3) Product group

1.3.1) Product type

Bath and shower additives, shower gel

Soap (solid, liquid)

Shampoo

Hair conditioner

Shaving products

1.3.2) Use

Consumer sector

Commercial sector

1.3.3) Target group – Baby product

Is it a listed baby product?

*Yes**No***1.4) Changes to the formulation**

Are changes to the formulation planned for within one year?

*Yes**No***ATTENTION****Changes to formulations are to be reported in writing without delay!****2) Specific product statements****2.1) pH value**

2.2) Density

3) Legislation/regulations**3.1) Current safety datasheet or product datasheet is enclosed/attached***as a paper document**electronically (email)*

other _____

ATTENTION**The current version of the safety datasheet or product datasheet must be submitted so as to permit the assessment of the ingredients to be carried out.****3.2) Declaration on the product***Complete**Per EU**None*

Other _____

3.3) Environmental symbol or other label*Nordic Swan**EU environmental symbol**None*

Other _____

4) Packaging

4.1.1) Type of packaging

Cardboard
Glass

Plastic
Other _____

4.1.2.) Packaging – Recycled materials

Are recycled materials used for the packaging?

Yes

No

4.2.1) Type of plastic

PE-HD

PVC (Polyvinyl chloride)

PP (Polypropylene)

Biodegradable plastics

Other _____

4.2.2) Plastic – Marking

Is the type of plastic used stated on the packaging?

Yes

No

4.3) Glass – Recycling system

Is the glass packaging used covered by the recycling system?

Yes

No

4.4) Volume of packaging

Percentage of the weight of packaging within the total product weight

_____ %

.....

5) Ingredients

5.1) Tensides

	CAS number	Chemical name
1		
2		
3		
4		
5		
6		

5.2) Total tenside level as a percentage by weight

0	> 0.1 - 5	5 - 10
10 – 20	20 – 30	> 3

5.3) Other ingredients

	CAS number	Chemical name or INCI name	Concentration as percentage by weight						
			< 0.1	0.1 - 1	1 - 5	5 - 10	10 - 20	20 - 30	> 30
1									
2									
3									
4									
5									
6									
7									
8									
	CAS number for fragrances	Chemical name or INCI name for fragrances	Concentration as percentage by weight for fragrances						
			< 0,1	0,001 – 0,1	0,1 - 1	1 - 5			
9									
10									
11									
12									

5.4) Water content as percentage by weight (in whole figures)

_____ %

5.5) Confirmation - Signature

With my signature I confirm that the product contains no more than the above-mentioned _____ ingredients (Point 5.1 + Point 5.3) and that all other data are complete and correct.

.....
Place, date

.....
Company stamp, signature



Criteria for the assessment of rinse-off products

I) Classification of the products

Criteria are defined for the products that permit classification of the ingredients as

 Permitted

 Prohibited

These criteria relate for one thing to the ingredients themselves and for another on the “quantity” of the ingredients used (percentage by weight).

The criteria cover common ingredients because of their toxicological classification regarding humans and ecology. Special regulations relate to tensides, preservatives, fragrances, enzymes, microplastics and other ingredients.

The following scheme applies to product assessment:

- Observance of the essential criteria for a positive assessment.
- Observance of concentration limits for individual substances and/or total parameters.

Chemical assessment:

- A prohibited ingredient (key: **red**) leads to the exclusion of the product.
- With products to be prohibited (R statements/H statements shown in the table below) a positive assessment of the product is not possible.
- If the product contains only permitted ingredients (key: **green**) it is assessed as positive and may therefore be marked with the wording “**Clever akafen – Product recommended by SuperDrecksKëscht®**”.

II) The criteria

A) Essential criteria for the products

Statements about the ingredients must be submitted complete (questionnaire, safety datasheet or product datasheet).

B) Criteria regarding the ingredients

No highly toxic, toxic, carcinogenic, chronically harmful or mutagenic ingredients or ones harmful to fertility over a limit of 0.01% assigned in accordance with the Hazardous Properties Regulations (EC) no. 1272/2008 by the European Parliament and Council dated 16 December 2008 (listed below) on the classification, marking and packaging of substances and mixtures, on the amendment and repeal of Directives 67/548/EEC and 1999/45/EC and on the amendment of Regulations (EC) no. 1907/2006 (CLP Regulations).

H statements	Classification
H300 Fatal if swallowed	>0,01 %
H301 Toxic if swallowed	>0,01 %
H304 May be fatal if swallowed and enters airways	>0,01 %
H310 Fatal in contact with skin	>0,01 %
H311 Toxic in contact with skin	>0,01 %
H317 May cause an allergic skin reaction	>0,01 %
H330 Fatal if inhaled	>0,01 %
H331 Toxic if inhaled	>0,01 %
H334 May cause allergy or asthma symptoms or breathing difficulties if inhaled	>0,01 %
H340 May cause genetic defects	>0,01 %
H350 May cause cancer	>0,01 %
H350 i May cause cancer if inhaled	>0,01 %
H351 Suspected of causing cancer	>0,01 %
H360 May damage fertility or the unborn child	>0,01 %
H361 d Suspected of damaging the unborn child	>0,01 %
H361 f Suspected of damaging fertility	>0,01 %
H362 May cause harm to breastfed children	>0,01 %
H370 Causes damage to organs	>0,01 %
H371 May cause damage to organs	>0,01 %
H372 Causes damage to organs through prolonged or repeated exposure	>0,01 %
H373 May cause damage to organs through long or repeated exposure	>0,01 %
H400 Very toxic to aquatic life	>0,01 %
H410 Very toxic to aquatic life with long-lasting effects	>0,01 %
H411 Toxic to aquatic life with long-lasting effects	>0,01 %
H412 Harmful to aquatic life with long-lasting effects	>0,01 %
H413 May cause long-lasting harmful effects to aquatic life	>0,01 %
H420 Harms public health and the environment by destroying ozone in the upper atmosphere	>0,01 %
EUH029 Contact with water liberates toxic gas	>0,01 %
EUH031 Contact with acids liberates toxic gas	>0,01 %
EUH032 Contact with acids liberates very toxic gas	>0,01 %
EUH070 Toxic by eye contact	>0,01 %

Exceptions to concentration limits: See for the following ingredient groups:

Enzymes → H317 and H334

Preservatives → H317, H334, H400, H411, H412 and H413

Tensides → H400, H412 and H 413

1) Tensides

With tensides one should bear in mind that this group is large and that even within a class of compounds the properties of tensides may in some cases be quite different depending on their precise chemical structure.

For the assessment of tensides, the percentages are not as relevant since rinse-off products are mainly mixtures or watery solutions. There are often group descriptions that makes attribution of the correct H statements more difficult.

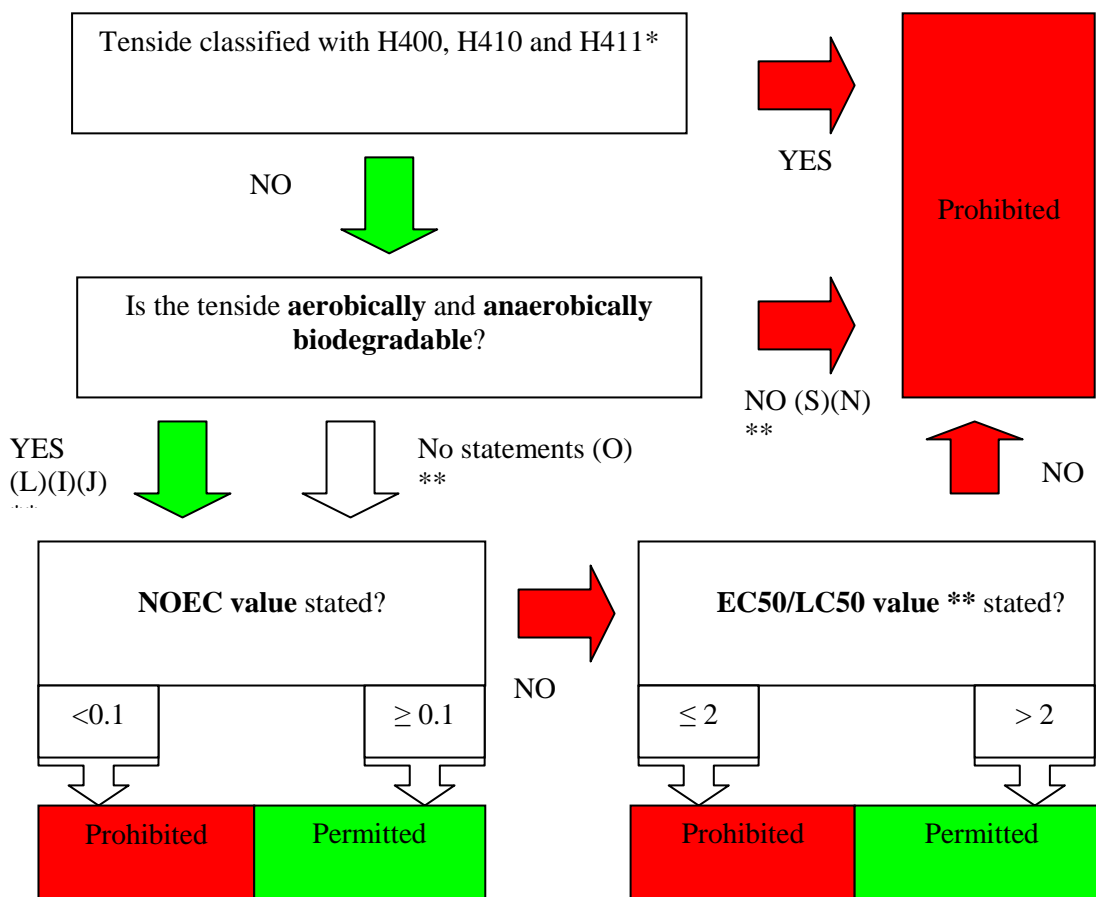
Classification according to the DID list

If possible, ingredients should be classified according to the **DID list** (Detergent Ingredient Database). The current version of the DID list is to be found on:

http://ec.europa.eu/environment/ecolabel/documents/2014_did_list_Part%20A.pdf

The following parameters are set down in the DID list:

- Aerobic and anaerobic biodegradability
- NOEC value or EC50/LC50 value



* H statements H400 and H410 are generally classified as “highly polluting” and hence as prohibited.
 H400 Very toxic to aquatic life
 H410 Very toxic to aquatic life with long-lasting effects.

** See the current DID list in the Ecolabel Criteria annex
http://ec.europa.eu/environment/ecolabel/documents/2014_did_list_Part%20A.pdf

Since no individual concentrations are stated with tensides, classification of products relies on the value for the tenside with the worst classification.

The major tensides on the DID list with their corresponding assessments are shown in the tables below. Exceptions and comments on the scheme shown in the table are listed in footnotes.

This classification is only an indication. If the manufacturer provides data that lead to a change in the classification of a tenside used by him, the tenside may be correspondingly upgraded or downgraded.

Glossary on tenside assessment:

NOEC = No Observed Effect Concentration = concentration at which no effect is observed in a chronic test

LC50 values = Lethal concentration, the concentration at which lethal consequences are evidenced in 50% of the organisms within a specified period.

2) Fragrances

- a) All ingredients added to the product as fragrances must have been manufactured, processed, and/or used in accordance with the International Fragrance Association (IFRA)'s code of conduct.
- b) Fragrances may be classified as H412 or H413.
- c) Products that are recommended and advertised for babies may not contain fragrances.
- d) Nitro musk and polycyclic musk compounds are prohibited.
- e) The following fragrances are permitted up to 0.01%.

INCI name	CAS no.	Classification
Benzyl alcohol	100-51-6	> 0,01 %
Amyl cinnamal	122-40-7	> 0,01 %
Cinnamyl alcohol	104-54-1	> 0,01 %
Citral	5392-40-5	> 0,01 %
Eugenol	97-53-0	> 0,01 %
Hydroxycitronellal	107-75-5	> 0,01 %
Isoeugenol	97-54-1	> 0,01 %
Amylcinnamyl alcohol	101-85-9	> 0,01 %
Benzyl salicylate	118-58-1	> 0,01 %
Cinnamal	104-55-2	> 0,01 %
Coumarin	91-64-5	> 0,01 %
Geraniol	106-24-1	> 0,01 %
Hydroxyisohexyl 3-cyclohexene carboxaldehyde	31906-04-4	> 0,01 %
Anise alcohol	105-13-5	> 0,01 %
Benzyl cinnamate	103-41-3	> 0,01 %
Farnesol	4602-84-0	> 0,01 %
Butylphenyl methylpropional	80-54-6	> 0,01 %
Linalool	78-70-6	> 0,01 %
Benzyl benzoate	120-51-4	> 0,01 %
Citronellol	106-22-9	> 0,01 %
Hexyl cinnamal	101-86-0	> 0,01 %
Limonene	5989-27-5	> 0,01 %
Methyl-2-octynoate	111-12-6	> 0,01 %
Alpha-isomethyl ionone	127-51-5	> 0,01 %
Evernia prunastri extract	90028-68-5	> 0,01 %
Evernia furfuracea extract	90028-67-4	> 0,01 %

3) Colourings

Only foodstuff colourings are permitted as colourings.

	Classification
Positive list per Kosmetikverordnung (Cosmetics Regulations), foodstuff colourings	
Other colourings	

4) Preservatives

Preservatives are only permitted for preservation during transportation and storage (in-can preservation). Only preservatives permitted for cosmetics may be used. Preservatives may be classified to H statements H400, H411, H412, H413, H317 and H334.

	Classification
Formaldehyde, formaldehyde donors, parabens, triclosan	
Other preservatives	

5) Enzymes

Enzymes with H317 or H334 are permitted up to 0.1% provided that they are encapsulated.

	Classification
Enzymes with H317, H334, encapsulated	> 0.01 %

6) Other ingredients

The product must not contain ethylene diamine tetraacetate (EDTA) or its salts, nitrilotriacetate (NTA), boric acid or their salts, phosphoric acid esters or phthalates or not easily biodegradable phosphonates.

Microplastics (insoluble plastic particles of < 1 mm not biodegradable per OECD 301 A-F) may not be deliberately used either. Nano-silver compounds are also prohibited.

	Classification
EDTA and its salts, NTA	
Boric acid, borates, perborates	
Phosphates and not easily biodegradable phosphonates	
Phthalates and phosphoric acid esters	
Microplastic particles (insoluble plastic particles of < 1 mm not biodegradable per OECD 301 A-F)	
Nano-silver	
Alkylphenol ethoxylates (APEOs) and other alkylphenol derivatives	
D4 and D5 siloxanes, cyclotetrasiloxanes, cyclomethicones	
Endocrine active substances per the EU Commission: <i>http://ec.europa.eu/environment/chemicals/endocrine/pdf/final_report_2007.pdf</i>	

C) Criteria concerning packaging

Packaging must consist of 100% recyclable materials (e.g. cardboard, plastic, glass, ...).

When plastic is used, the type of plastic must be stated (e.g. PE, PP, ...). Biodegradable plastics and plastics made of PVC are not permitted.

If glass containers are used, a positive assessment may only be made in a recycling system.

Where possible, refillable packaging and packaging made from recycled materials should be offered.

In general, unnecessary packaging should be avoided:

- So products may only be positively assessed if the packaging does not exceed 30% of the total weight. One exception is "sample packaging" that is positively assessed if other pack sizes with significantly lower packaging weight compared with total weight are offered in the trade.

- Unnecessary outer packaging should where possible be avoided and in individual cases may lead to prohibition of the product.

**Products must meet all the above-mentioned criteria for the wording
"Clever akafen - Product recommended by SuperDrecksKëscht®" to be used.**



Tips on completing the questionnaire

These tips are to make it easier to complete the questionnaire for recording the ingredients.

Please do not forget to enclose any additional documents (safety datasheets, product datasheets, brochures, technical datasheets etc.) with the completed questionnaire.

All statements will of course be treated confidentially. The completed questionnaires are used only for accurate assessment.

1) General statements

1.1) Manufacturer

Please make sure to state a contact person for any further questions.

1.2) Product name

Please state the exact name of the product.

1.3.1) Product type

Classify to product group with a tick.

1.3.2) Use

Classify to area of use with a tick.

1.3.3) Target group – Baby product

Please classify with a tick.

1.4) Changes to the formulation

Please confirm with a tick.

2) Specific product statements

2.1) pH value

Please state the product's pH value.

2.1) Density

Please state the product's density.

3) Legislation/regulations

3.1) Safety datasheet or product datasheet

If there is a current safety datasheet or product datasheet available for the product, please submit it to us.

ATTENTION

The current version of the safety datasheet or product datasheet must be submitted for the assessment of the ingredients to be performed.

3.2) Declaration on the product

Please state the nature of the declaration.

3.3) Environmental symbols or other labels

If the product has been awarded a national or international environmental symbol or other label, please state this here.

4) Packaging

4.1.1) Type of packaging

Please indicate packaging type with a tick.

4.1.2) Packaging – Recycled materials

Please classify with a tick.

4.2.1) Type of plastic

Please indicate type of plastic with a tick.

4.2.2) Plastic – marking

Please indicate with a tick.

4.3) Glass – Recycling system

Please indicate with a tick.

4.4) Sample packaging

Please state the percentage of the weight of the packaging compared to the total product weight.

5) Ingredients

5.1) Tensides

All tensides are to be stated with the exact chemical name. For accurate identification please also state the CAS number.

5.2) Total tenside content as a percentage by weight

Please indicate with a tick the total tenside content as a percentage by weight.

5.3) Other ingredients

All the ingredients are to be stated with their exact chemical names. Please also state the CAS number for accurate identification. All statements are to be made as percentages by weight. If useful, the function of the ingredient in the product may be stated in brackets. All organic solvents together with their concentrations as percentages by weight must of course also be listed here.

5.4) Water content in the percentage by weight (whole figures)

Please enter the water content as a percentage by weight.

5.5) Confirmation – Signature

In order to avoid errors or lack of clarity when detailing the ingredients, we would ask you once more to state the total number of all the ingredients (Point 5.1).

All the statements on the questionnaire are to be confirmed with the company stamp and a signature.