

EU Ecolabel criteria for cosmetic products

Criteria and application process

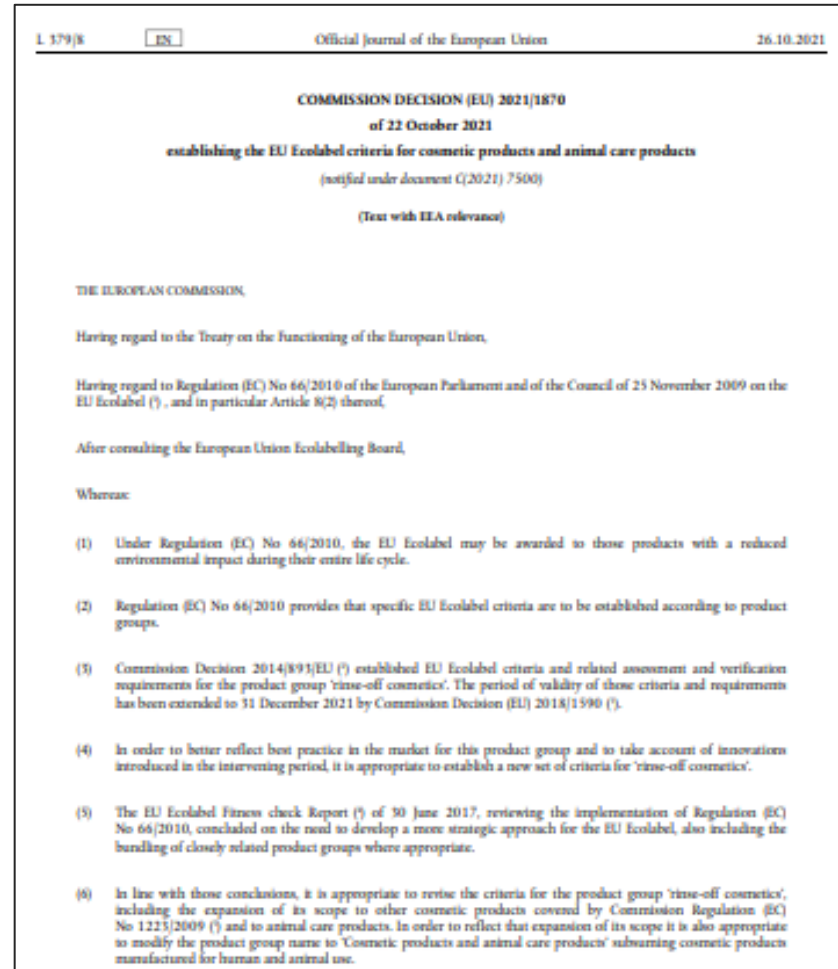
Giorgia Faraca, Joint Research Centre

Commission Decision (EU) 2021/1870 establishing EU Ecolabel criteria for **COSMETIC PRODUCTS** and **ANIMAL CARE PRODUCTS**

- ✓ Validity until 31 Dec 2027
- ✓ Cosmetic products addressed in Annex I

Scope aligned with the **Cosmetics Regulation**

- **Rinse-off products**: soaps, shampoos, shower preparations, hair conditioners, shaving preparations, toothpaste....
- **Leave-on products**: creams, oils and lotions, hairstyling products, sunscreens, decorative cosmetics, deodorants...



Overview of EU Ecolabel criteria

Target the environmentally best cosmetic products on the market

| New EU Ecolabel criteria | Environmental aspects |
|--|----------------------------|
| Criterion 1. Toxicity to aquatic organisms (CDV) | Emissions to water |
| Criterion 2. Biodegradability of rinse-off products | |
| Criterion 3. Biodegradability and aquatic toxicity of leave-on products | |
| Criterion 4. Restricted substances | Hazardous substances |
| Criterion 5. Packaging | Raw material extraction |
| Criterion 6. Renewable ingredients | Land use and biodiversity |
| Criterion 7. Fitness for use | Efficient use of resources |

Reducing emissions to water

Rinse-off products



Leave-on products



Reducing emissions to water

Rinse-off products



Leave-on products



Criterion 1: Aquatic toxicity

| Product category | CDV (l/g AC) |
|---|--------------|
| Shampoos, soaps, shower preparations, shaving soaps and toothpaste (solid form) | 2 200 |
| Liquid soaps and shower preparations | 10 000 |
| Shampoos (liquid form) | 11 000 |
| Feminine hygiene cosmetic products | 12 000 |
| Hair conditioners | 12 000 |
| Rinse-off hair styling and treatment products (hair dyes) | 12 000 |
| Rinse-off skin care products (exfoliants) | 12 000 |

Criterion 2: Biodegrad ability

- Readily biodegradable surfactants
- Limitation to the content of non-biodegradable organic substances (**aNBO**, **anNBO**)

Reducing emissions to water

Rinse-off products



Criterion 1: Aquatic toxicity

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Criterion 2: Biodegradability

- Readily biodegradable surfactants
- Limitation to the content of non-biodegradable organic substances (**aNBO, anNBO**)

Leave-on products



Criterion 3: Aquatic toxicity and biodegradability

For 95% of organic ingoing substances:

- readily biodegradable, or
- low aquatic toxicity + not be bioaccumulable, or
- low aquatic toxicity + potentially biodegradable, or
- low aquatic toxicity + not be bioavailable

Reducing hazardous chemicals

Criterion 4: Excluded and restricted substances

- Restriction of substances with specific H classification
- Exclusion of carcinogenic, mutagenic or toxic for reproduction substances and SVHCs
- Exclusion of microplastics, PFAS, phthalates, endocrine disruptors, isothiazolinones
- Exclusion of **fragrances** in products for children or gentle/mild
- Restriction on **preservatives** and **colorants**
- **UV filters** not bioaccumulating or low toxicity

Reducing waste

Criterion 5: Packaging

- **Small bottles** are not allowed for rinse-off products
- **Secondary packaging** is not allowed
- Refills and **recycled materials** are encouraged
- Packaging cannot be excessive nor exaggerate residual amount of product in the packaging: **PIR + R**
- Packaging materials cannot be combined if **hindering recycling**

Criterion 7: Fitness for use

Laboratory or **consumer tests** to demonstrate primary and secondary functions



Reducing impacts to land use and biodiversity

Criterion 6:
**Sustainable
sourcing of palm
oil, palm kernel oil
and their
derivatives**

100% w/w of such ingredients shall come from **certified sustainable production**, addressing environmental impacts on soil, biodiversity, organic carbon stocks and conservation of natural resources

Roundtable for Sustainable Palm Oil (RSPO)



Assessment and verification – key aspects

- The specific requirements are **indicated within each criterion**
- Documentation, declarations, analyses, test reports → from the **applicant and/or supplier(s)**
- Competent bodies shall recognise attestations which are issued by **accredited bodies**



As a prerequisite, the cosmetic product or animal care product shall meet all applicable legal requirements of the country or countries in which the product is placed on the market.

Who can apply for the EU Ecolabel?

- ✓ Producers, manufacturers, importers, service providers and wholesalers placing their products and/or services on the **EEA market** (the European Union, Lichtenstein, Norway and Iceland) can apply for the EU Ecolabel. **Retailers** can also apply for products placed on the market under their own brand name.
- ✓ Also products produced outside the EU can be awarded the EU Ecolabel, on the condition that they **meet the criteria** for their respective product group and that the product is **sold in the EEA market**.



How to apply for the EU Ecolabel?

Important links and contacts:

European Commission EU Ecolabel website:

https://environment.ec.europa.eu/topics/circular-economy/eu-ecolabel_en

Helpdesk Email: helpdesk-eu-ecolabel@adelphi.de



Product groups and criteria

Absorbent hygiene products

Animal care products

Cosmetic products

Reusable Menstrual Cups



[Commission Decision \(EU\) 2021/1870 of 22 October 2021](#)

[Amending/correcting act -2023](#)

[Corrigendum MT, SK](#)

[Corrigendum FR](#)

31 December 2027

[User Manual - Cosmetic Products](#)

How to apply for the EU Ecolabel?

- **Contact your National Competent Body** (you can find yours [here](#))
- Pre-register your product (good or service) on [ECAT](#)
- Prepare application dossier
- Submit your application
- Pay your fee (details [here](#))
- Have your application positively assessed
- Be awarded with an EU Ecolabel licence
- Promote your products!

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Application fee

| Applicable Amount (min-max) | Size/location of the applying enterprise |
|-----------------------------|--|
| 200 - 2 000 EUR | Large enterprise |
| 200 - 600 EUR | SME/developing countries |
| 200 - 350 EUR | micro-enterprise |

Annual fee

| Applicable Amount (min-max) | Size/location of the applying enterprise |
|-----------------------------|---|
| 0 -25 000 EUR | Large enterprise |
| 0 -18 750 EUR | SME/micro-enterprise/developing countries |

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More details [here](#)

Supplementary materials

- **User Manual: Parts A and B: General Information and description of requirements for the product.**



Supplementary materials



EU Ecolabel
www.ecolabel.eu

EU Ecolabel for cosmetic products and animal care products

Instructions for completing the Application form for the EU Ecolabel for cosmetic products

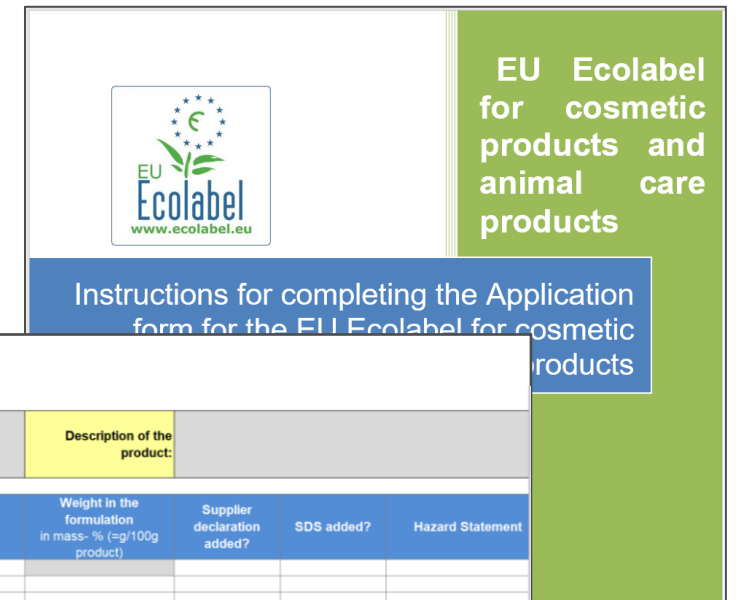
- **User Manual:** Parts A and B: General Information and description of requirements for the product.
- **Application Form** – Separated Excel file that should **be completed by the applicant** and submitted electronically.

| COMMISSION DECISION | | 2021/xxx/EU | |
|---------------------|----------------------------|-------------|-----------------------------|
| Product name: | Annex I: Cosmetic products | | Description of the product: |
| Annex: | | | |
| Type of product: | | | |
| Product category: | | | |

| Ingredient trade name | Manufacturer | Function (please select) | Weight in the formulation in mass- % (=g/100g product) | Supplier declaration added? | SDS added? | Hazard Statement |
|-----------------------|--------------|-----------------------------|---|-----------------------------|------------|------------------|
| 1 Water | | | | | | |
| 2 | | | | | | |
| 3 | | | | | | |
| 4 | | | | | | |
| 5 | | | | | | |
| 6 | | | | | | |
| 7 | | | | | | |
| 8 | | | | | | |
| 9 | | | | | | |
| 10 | | | | | | |

| Weight in the formulation in mass- % (=g/100g product) | Hazard Statement In case H/EUH-statement with possible restrictions are detected, font changed to red | If H-phrase restricted: exemption because (please select) | BCF / log Kow Select for preservatives, colorants and UV filters | Value of BCF / log Kow |
|--|--|---|---|------------------------|
| 70,898 | | | | |
| 11,900 | H318 H315 H412 | Deroated substance | | |
| 5,100 | NC | Deroated substance | | |
| 5,000 | H319 | Below measurement threshold Zinc exemption (maximum 25%) | | |
| 0,002 | H301 H311 H311 H400 H410 H314 H318 H317 | Below measurement thri | Log Kow | -0,71 |
| 7,000 | NC | | | |
| 0,040 | H318 | | | |
| 0,040 | H318 | | | |
| 0,014 | NC | | | |
| 0,006 | H412 | Below measurement threshold | | |

Supplementary materials



- **User Manual:** Parts A and B: General Information and description of requirements for the product.
- **Application Form** – Separated Excel file that should **be completed by the applicant** and submitted electronically.
- **Annex I and II.** Declarations from the producer/supplier of the ingredients and of the packaging.

| COMMISSION DECISION | | 2021/xxx/EU | |
|---------------------|----------------------------|-------------|-----------------------------|
| Product name: | Annex I: Cosmetic products | | Description of the product: |
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| Type of product: | | | |
| Product category: | | | |

| Ingredient trade name | Manufacturer | Function (please select) | Weight in the formulation in mass- % (=g/100g product) | Supplier declaration added? | SDS added? | Hazard Statement |
|-----------------------|--------------|--------------------------|--|-----------------------------|------------|------------------|
| 1 Water | | | | | | |
| 2 | | | | | | |
| 3 | | | | | | |
| 4 | | | | | | |
| 5 | | | | | | |
| 6 | | | | | | |
| 7 | | | | | | |
| 8 | | | | | | |
| 9 | | | | | | |
| 10 | | | | | | |

| Weight in the formulation in mass- % (=g/100g product) | Hazard Statement |
|--|---------------------|
| 70,898 | |
| 11,900 | H318 H319 |
| 5,100 | H318 H319 |
| 5,000 | H318 H319 |
| 0,002 | H301 H311 H410 H314 |
| 7,000 | H318 H319 |
| 0,040 | H318 H319 |
| 0,040 | H318 H319 |
| 0,014 | H318 H319 |
| 0,006 | H318 H319 |

EU ECOLABEL USER MANUAL
COSMETIC AND ANIMAL CARE PRODUCTS
Commission Decisions for the award of the EU Ecolabel for Cosmetic and Animal Care Products (2021)

Declaration from the manufacturer/supplier of the raw material used for the production of cosmetic products

This declaration is to be filled in by the manufacturer/supplier(s) of raw materials used as part of the formulation of the cosmetic product. The declaration shall be based on the best of the manufacturer's/supplier's knowledge at the time of declaring.

As the manufacturer/supplier of _____ used as a (indicate the function of the raw material) _____

[Insert in the following table the INCI name, the DID number (if it is available), function of all substances present in the raw material and specify if they are organic or inorganic]

| INCI name | DID no. (if available) | Function of substance | Organic/inorganic substance |
|---------------------|-------------------------|-------------------------|-----------------------------|
| INCI of substance 1 | Function of substance 1 | Function of substance 1 | Organic or inorganic |
| INCI of substance 2 | Function of substance 2 | Function of substance 2 | Organic or inorganic |
| ... | ... | ... | ... |

I declare the following statements to be true:

Criterion 4: Excluded or restricted substances

(a) Restrictions on ingoing substances classified under Regulation (EC) No 1272/2008

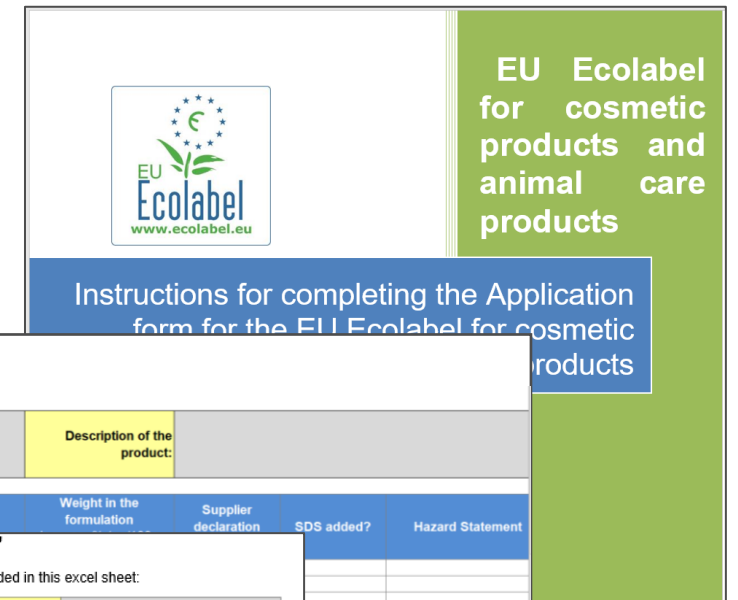
(a)(i) RESTRICTED SUBSTANCES

I declare that the raw materials do not contain restricted substances with the hazard statements specified in the Commission Decision, in accordance with the list in Table below on *Restricted hazard classes, categories and associated hazard statements codes*.

I declare that the raw materials contain the following amounts of restricted substances with the hazard statements specified in the Commission Decision, in accordance with the list in Table below on *Restricted hazard classes, categories and associated hazard statements codes*.

| Raw material | Classified substance (INCI) | Classification | Concentration in the raw material (% weight by weight) |
|--------------|-----------------------------|----------------|--|
| | | | |
| | | | |

Supplementary materials



- **User Manual:** Parts A and B: General Information and description of requirements for the product.
- **Application Form** – Separated Excel file that should **be completed by the applicant** and submitted electronically.
- **Annex I and II.** Declarations from the producer/supplier of the ingredients and of the packaging.
- **Application Form Guide:** A short guide on how to fill out the application form.

2. Sheet "Product formulation"

The general information about the product shall be included in this excel sheet:

| | | |
|-------------------|----------------------------|-----------------------------|
| Product name: | Annex I: Cosmetic products | Description of the product: |
| Annex: | | |
| Type of product: | | |
| Product category: | | |

- Enter the **product name** and a short **description** of the product (type of product, intended use and kind of consumers for which it is intended, etc.)
- Select the **type of product** considering the following definitions: "**Rinse off products**" are those marketed as intended to be removed with water after use in normal conditions; and "**Leave on products**" are those marketed as not intended to be removed with water after use in normal conditions.
- Specify the type of product selecting the **product category** from the list:

Product category:

- Shampoos - soaps, shower preparations and toothpaste (solid)
- Shaving solid soaps
- Liquid soaps and shower preparations
- Shampoos (liquid form)
- Feminine hygiene cosmetic products
- Hair conditioners
- Rinse-off hair styling and treatment products (hair dyes)
- Rinse-off skin care products (exfoliants)

Table 2 of the User Manual includes a list of the different categories and the products considered in each category.

The **full formulation** of the product shall be entered: fill in the information regarding the ingredients contained in the product formulation specifying their tradename (the same as the SDS and the declaration), the manufacturer or supplier, the function, and the weight (%) in the formulation. The sum of all ingredients (including water) must be 100 (%). Specify the hazard statements of the product (this information is included in the Chapter 2 of the SDS), if the product is not classified write NC.

| Ingredient trade name | Manufacturer | Function (SDS annex I) | Weight in the formulation in mass-% (up to 100g product) | Supplier declaration (SDS annex I) | SDS added? | Hazard Statement |
|-----------------------|--------------|------------------------|--|------------------------------------|------------|------------------|
| Water | | | 60.3 | | | |
| Ingredient 1 | SLP1 | Surfactant | 17 | Yes | Yes | H315 |
| Ingredient 2 | SLP2 | Dilute | 5 | Yes | Yes | NC |
| Ingredient 3 | SLP3 | Preservative | 1.5 | Yes | Yes | H412 |
| Ingredient 4 | SLP4 | Dilute | 7 | Yes | Yes | NC |
| Ingredient 5 | SLP5 | Paraglycerin | 0.2 | Yes | Yes | H315 |
| Sum: | | | 100 | | | |

Must be 100

Table below on Restricted hazard classes, categories and associated hazard statements

| Raw material | Classified substance (INCI) | Classification | Concentration in the raw material (% weight by weight) |
|--------------|-----------------------------|----------------|--|
| | | | |

Have queries on the EU Ecolabel?

More info:

- [Official Journal Publication](#)
- [Preliminary Report](#)
- [Technical Report](#)
- [JRC Product Policy Analysis website](#)
- [EU Ecolabel website](#)

Questions on the criteria or application process?

Contact: helpdesk-eu-ecolabel@adelphi.de

Thank you

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