



To Whom It May Concern:

Your ref.

Our ref
2011104/1.1.3/AH/akf

Date
October, 2011

Consultative proposal – criteria for the ecolabelling of car- and boatcare products

Nordic Ecolabelling has developed revised criteria for the ecolabelling of car- and boatcare products. The documents, including background document, form for feedback and list of recipients, have been published on our webpage www.ecolabel.no.

The proposal has been prepared in a working group within the Nordic Ecolabelling under the supervision of Ecolabelling Norway. Nordic Ecolabelling would like to have your comments on the revised criteria. Your comments are important when the proposal is further developed after the consultation process.

We would be grateful to receive your comments by **December 15th 2011**.

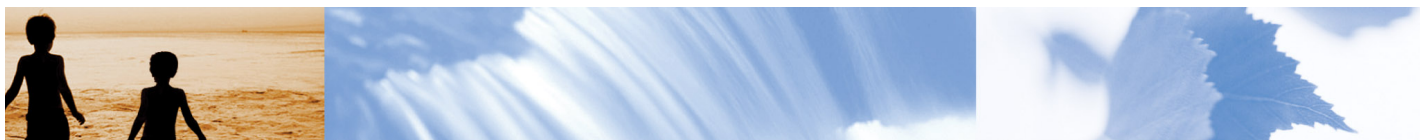
Nordic Ecolabelling is especially interested in comments regarding **super concentrates** and **windscreen washer liquids**. In addition we would like comments regarding the following requirements:

- Introduction of CLP regulation (a harmonised system for classification, labelling and packaging of substances and mixtures of substances).
- Tightening of the requirements regarding environmental hazardous substances (R5)
- New requirements regarding nanomaterials (R8)
- Requirements regarding anaerobic biodegradability only for surfactants (R9)
- Tightening of the requirements regarding banned substances (R10).

The list with banned substances have been extended and tightened.

It is for instance introduced a ban against substances that according to REACH fulfil the criteria for SVHC (Substances of Very High Concern), that is for instance:

- PBT (*persistent, bioaccumulating and toxic*) and/or vPvB (*very persistence and very bioaccumulative*)-substances
- CMR (*carcinogenic/mutagenic/toxic to reproduction*)-substances in category 1 and 2
- substances considered as *endocrine disrupters or potential endocrine disrupters*
- Introduction of differentiated CDV-requirements (R14)
- Requirements regarding preservatives updated according to OECD guidelines (R15)
- The efficiency-requirement is clarified (R26)





Super concentrates (R4)

- What is a distinct og unambiguous definition of the term "super concentrates"?
- How will super concentrates manage the requirements regarding classification in **R3** and **R5**?
- Other aspect regarding super concentrates?

Windscreen washer fluids

During this consultation process, Nordic Ecolabelling would like suggestions regarding **diluted windscreen washer fluids**, because we are in a process discussing whether or not diluted windscreen washer fluids should be ecolabelled.

From manufacturers/distributors/importers of windscreen washer fluids, we ask:

- What kind of windscreen washer fluids are on the market (concentrated and diluted)?
- What share of the market does concentrated windscreen liquids make of the total market? (in volume%)? And diluted?
- What kind of packaging is used for diluted windscreen washer fluids?
- Does the ingoing components come for renewable resources?
- Are there diluted windscreen washer fluids that are more environmental friendly than other diluted washer fluids? How do these products distinguish themselves from other products?
- How does the producers/manufacturers look at the future development of washer liquids in the Nordic countries? Is there a market for concentrated washer fluids? What about washer liquids in containers/tanks?
- We would also like to know your opinion on the following proposal for diluted windscreen liquids:

The windscreen washer fluid packaging may not weigh more than 18 g per litre of concentrated product.

Who can give comments?

Persons, companies and institutions that are interested in co-operation and developing ecolabelling criteria for car- and boatcare products can give their comments on the proposal. We ask you to distribute information on the proposal to those who could be interested and are affected by the proposed requirements.

Please send your comments to Anne Kristine Feltman, akf@svanemarket.no, or log on to our webpage www.ecolabel.no and use the form for feedback.

An overview of the comments we receive will be available at the ecolabelling organisations..

Regards
Ecolabelling Norway

Alvild Hedstein
Managing Director

