

To whom it may concern

18 November 2009
TTA/CDL

Concerning: Hearing on Nordic ecolabelling of Cosmetic products

Dear Sir/Madam

A working group within Nordic Ecolabelling has in collaboration with experts worked out a draft proposal for criteria for Nordic ecolabelling of cosmetic products. Eco-labelling Denmark asks kindly for you no later than **18 January 2010**. The proposal will hereafter be discussed at the Danish Ecolabelling Board and thereafter at the Nordic Eco-labelling Board.

Besides the proposal in general we ask you to pay attention to the following:

Major changes compared to version 1.6 of the criteria for cosmetics:

- Combining the criteria documents for cosmetics (090) and shampoo/soaps (027)
- A new general requirement for biodegradability of all organic ingredients
- Introduction of a limit for the content of environmentally harmful substances
- Expansion of the list of those that must not be present in the product
- Tightened and changed limit for CDV (critical dilution volume, concept of GN is phased out)
- Voluntary requirement on cosmetics made of renewable and sustainable raw materials
- Changed requirements for packaging
- Exclusion of the requirement on animal testing as well as other "law requirements"

Nordic ecolabelling especially wishes comments on the following matters:

- The two alternative requirements for nanomaterials/particles (R6)
- The cut-off limit of the general requirement for biodegradability of all organic ingredients and the division of the requirements (R9 and R10)
- The cut-off limit for the content of environmentally harmful substances (R3)
- The relevance of the two different levels for constituent substances/contaminants (Chapter 1)
- The relevance of the requirement on heavy metals applying to all raw materials, not only colours (R12)
- The relevance of a separate efficiency requirement for toothpaste (R42)
- The test and exception of "mild products" (R8 and R43)

- The new packaging requirements applicable for all product types (R29)

The proposed criteria and the background document will be available at Eco-labelling Denmark's web site www.ecolabel.dk. The documents are in PDF format, and they can only be opened and read via the program Adobe Acrobat Reader. You can download the program for free from Adobe's web site: www.adobe.dk. If you prefer it the documents send to you please order them at Eco-labelling Denmark phone +45 72 400 450.

Who may comment?

All persons, companies and institutions interested in developing the criteria for Nordic ecolabelling of cosmetic products may comment on the proposal. We ask you kindly to spread the information on the hearing to those who may be interested.

We urge you kindly to fill in the enclosed statement form and mail your comments to Lene Mødrup lm@ecolabel.dk no later than **18 January 2010**.

When the review has ended and the criteria document has been adopted by the Nordic Eco-labelling Board a hearing compilation containing all comments and Nordic Ecolabelling's comments to these will be sent to those who have commented on the proposal to Ecolabelling Denmark as well as it will be published on Eco-labelling Denmark's website.

We hope to hear from you soon.

Yours sincerely
Eco-labelling Denmark



Trine Thorup Andersen and
Project Leader

Lene Mødrup
substituting Project leader (Dec 2009 / Jan 2010)

Enclosed: Statement form.