

# CB Forum Agenda

In person – Conference Center Albert Borschette, Rue Froissart 36, 1040 Brussels

12.03.2025 | 09:30 – 13:00 CET

Welcome		
1	09:30 – 09:40	CHAIR <ul style="list-style-type: none"> <li>Adoption of the agenda</li> <li>AOB requests</li> </ul>
Virtual CB Forum Summary		
2	09:40 – 09:55	CHAIR/HD/CBs Summary of past & ongoing Virtual CB Forum discussions and reminder on the VCBF procedure
CB Forum Rules of Procedure		
3	09:55 – 10:00	EC Presentation and vote of updated CB Forum Rules of Procedure
I&I-Dishwasher Detergents and I&I-Laundry Detergents: Multi component systems		
4	10:00 – 10:20	CB DE Multi component systems (MCS) in I&I-Dishwasher Detergents and I&I-Laundry Detergents: display in ECAT and labelling of a component
Printed Paper products: interpretation of criterion 4.2.b.		
5	10:20 – 10:40	CB HU Clarification in interpretation of criterion 4.2.b. for printed paper products on TVOC loads
Coffee Break: 10:40 – 10:55		
Absorbent hygiene products: Lycra material		
6	10:55 – 11:10	CB CZ / CB SE Discussion on Lycra material criterion 7 (potential continuation of VCBF N96, tbd)
Logo Guidelines: Minimum size requirements		
7	11:10 – 11:30	CB PT Logo Guidelines: Minimum size requirements for the EU Ecolabel logo in printed paper products (newspapers, leaflets, books, etc).
Logo Guidelines: Raw material producers		

8	11:30 – 11:50	EC	Logo Guidelines: Discussion on potential options for communication of ingredients that can be suitable for the EU Ecolabel products
<b>Coffee Break: 11:50 – 12:05</b>			
<b>ECAT updates</b>			
9	12:05 – 12:25	HD/EC IT Team/CBs	Presentation of new updates in improving ECAT. Discussion on the comparison of ECAT numbers with official statistics and ECAT European Championship.
<b>ECAT as a tool for submission of EU Ecolabel applications</b>			
10	12:25 – 12:45	EC/EC IT	Discussion on ECAT opportunities as a tool for EU Ecolabel applications in the future.
<b>AOB &amp; conclusion of the CB Forum</b>			
11	12:45 – 13:00	CHAIR	Any other business and conclusion

# Annexes

## 2. Virtual CB Forum Summary

CHAIR/CBs	<p>Summary of past &amp; ongoing Virtual CB Forum discussions and reminder on the VCBF procedure</p> <p>➤ <i>Information</i></p>
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The Chair will give a brief overview of the past and ongoing VCBF discussions and will reiterate the [VCBF procedure](#).

## 3. CB Forum Rules of Procedure

EC	<p>Presentation of updated CB Forum Rules of Procedure</p> <p>➤ <i>Information/Vote</i></p>
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Following the discussion held in the CB Forum meeting in November 2024, on the proposal from the EC regarding a new rotation system, the CB Forum Rules of Procedure have been amended and updated accordingly, taking also into account the latest EC standard template for expert groups (and subgroups). As reflected in the "[COMMISSION DECISION of 30.5.2016 establishing horizontal rules on the creation and operation of Commission expert group](#)", the rules of procedures shall be adopted by simple majority of the expert group (subgroup) members. The CB Forum RoP will be sent out at least two weeks in advance of the CB Forum meeting, in view of a vote at the CB Forum meeting.

## 4. I&I-Dishwasher Detergents and I&I-Laundry Detergents: Multi component systems

CB DE	<p>Multi component systems (MCS) in I&amp;I-Dishwasher Detergents and I&amp;I-Laundry Detergents: display in ECAT and labelling of a component</p> <p>➤ <i>Information/Consultation</i></p>
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**Input from CBs on this question is needed.**

### SITUATION:

Multi component systems (MCS) can be awarded with the EU Ecolabel in the product groups I&I-Dishwasher Detergents and I&I-Laundry Detergents. A MCS is composed of several components that all together build up a system for the washing process. The components for a laundry detergent fulfil different functions in the washing process like being the detergent, a bleaching agent, stain remover or softener. It is possible to include many components of which only a part is used in the washing process and a single component can be used in different MCSs.

CB Germany was approached by a licence holders as MCS are differently displayed in ECAT. There are currently two versions how such a system is displayed:

- Option A: Name of the multi component system (Component A, Component B, Component C, ...)
- Option B: Each individual component without a reference to the multi component system

The licence holder made a valid point that a MCS is awarded with the EU Ecolabel and not its components. Potential users are not aware of this point when looking into ECAT and may believe that the product itself is awarded with the EU Ecolabel. In the past it has been agreed that when the EU Ecolabel logo is used to label a component, the name of the awarded MCS should appear below the logo. (FAQ CB Forum, March CB Forum 2013, 05.03.2013, line 8)

The EU Ecolabel can be used only in association with awarded products. An MCS is awarded with the EU Ecolabel, and the award covers a set of allowed components that altogether form the “product”. A MCS is not a real product more a procedure how to use components, so the single component is not awarded with the EU Ecolabel and may be even not eligible for an EU Ecolabel itself like a bleaching agent or a softener. Allowing components to be labelled with EU Ecolabel logo deviates is not really covered by the criteria. Therefore, CB Germany would like to bring this point in the discussion although there was a very old decision in the CB Forum.

#### QUESTIONS:

- How should MCS correctly displayed in ECAT?
- Is the labelling of a component with the EU Ecolabel logo acceptable?

#### 5. Printed Paper products: interpretation of criterion 4.2.b.

CB HU	<p>Clarification in interpretation of criterion 4.2.b. for printed paper products on TVOC loads</p> <p>➤ <i>Information/Consultation</i></p>
<p><b>Input from CBs on this question is needed.</b></p>	

Printed Paper products: Commission Decision (EU) (EU) 2020/1803 of 27 November 2020

#### SITUATION:

CB HU has an applicant, a big printing house with heatset offset printing technology that is questioning the need to install an automatic monitoring system that is capable of providing continuous measurement data required by the criterion. The criterion says: "For any stack with a TVOC load higher or equal to 10 kg C/h the monitoring shall be continuous according to EN 15267-1, EN 15267-2, EN 15267-3 and EN 14181. For continuous measurement, the data shall represent daily average over the period of one day based on valid hourly or half-hourly averages."

The applicant argues that:

1. The TVOC load of their stack is lower than 10 kg C/h. They claim that their drying unit has an integrated afterburner that destroys most of the VOC leaving only a fraction of the amount left besides the amount entering the product or leaving in the form of diffuse emissions or waste (they do not recover VOC). Therefore, in their opinion, the TVOC load of the stack is the amount emitted by the afterburner to the stack. The alternative interpretation would be that the TVOC load of the stack is the amount emitted by the stack and destroyed by the afterburner. The TVOC load by the first approach is significantly lower than the one by the second, of course.

- Approach #1 says that TVOC load is:  $a - b - c - d - e$
- Approach #2 says that TVOC load is:  $a - b - c - d = e + f$

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- a - the amount entering the product

- b - the amount leaving in the form of diffuse emissions
- c - the amount going to waste
- d - the amount recovered for recycling
- e - the amount destroyed in the afterburner
- f - the amount leaving through the chimney.

2. The sister-companies of our applicant in Czechia, Poland and Romania are said to have similar instalments and capacities but have not been required to provide continuous measurements and install an expensive monitoring system when applying for the EU Ecolabel.

3. Besides, the applicant also claims that the heatset offset printing technology they apply is stable and the emitted amount of VOC is constant. Therefore, continuous monitoring of emissions is not only expensive but unnecessary as well.

#### QUESTIONS:

1. Which formula should be used (approach #1 or approach#2)?
2. Are the statements of the sister-companies of our applicant true and what were the reasons of the positive evaluations by other CBs?
3. Can this aspect be observed in the revision process?

### 6. Absorbent hygiene products: Lycra material

CB CZ / CB SE	Discussion on Lycra material criterion 7 (potential continuation of VCBF N96, tbd.) ➤ <i>Information/Consultation</i>
Input from CBs on this question is needed.	

Absorbent Hygiene Products: Commission Decision (EU) 2023/1809, Virtual CB Forum N96: Interpretation of Criterion 7 “Excluded and restricted substances” – Scope of Criterion

SITUATION: Continued discussion on VCBF N96, if needed.

#### QUESTION:

What would be your way in the assessment process?

1. To assess all materials that the applicant (AHP producer) is purchasing and adding in final product
2. To assess the chemical products used for the final product and/or any component. Chemical products used for materials would be out of scope.

### 7. Logo Guidelines: Minimum size requirements

HD/ EC IT Team	Logo Guidelines: Discussion on potential options for communication of ingredients that can be suitable for the EU Ecolabel products. ➤ <i>Information/Consultation</i>
Input from CBs on this question is needed.	

SITUATION:

The [EU Ecolabel Logo Guidelines](#) establish the following minimum size requirements for the EU Ecolabel logo.

**Size:**

- The logo should be visible and legible.
- The logo should be no smaller than 10.6 x 10.6 mm.

The following format applies to correctly reproduce the EU Ecolabel licence number:

- Font: Verdana
- Font size: Minimum 7

One of the printed paper license holders in Portugal has raised a concern regarding this requirement. They have a significant client portfolio requesting EU Ecolabel printed paper products, however, many clients do not authorize the printing of the EU Ecolabel logo due to its dimensions, which are considered too large, particularly the registration number.

They shared the following example showing how the dimension of the logo (10.6 x 10.6 mm; Font: Verdana. Font size: minimum 7) result in a disproportionate design, particularly for smaller materials like advertising leaflets.



They also gave the FSC logo as a comparison, which also requires a registration number but does not present this type of problem, as allows smaller dimensions of the logo, while maintaining legibility.

- 8.5 FSC labels shall be printed at a size at which **all elements are legible**. The minimum size for the label shall be:
- in portrait format: 9 mm in width
  - in landscape format: 6 mm in height.

**Recommended minimum size for label with all elements**



**Minimum size for all labels**



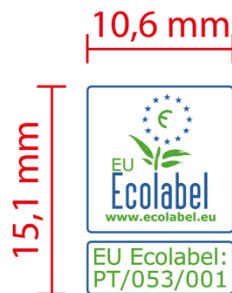
## QUESTIONS

- What is the perspective of other CBs and have their license holders raised similar concerns?
- Would the CBs agree to update the Logo Guidelines?

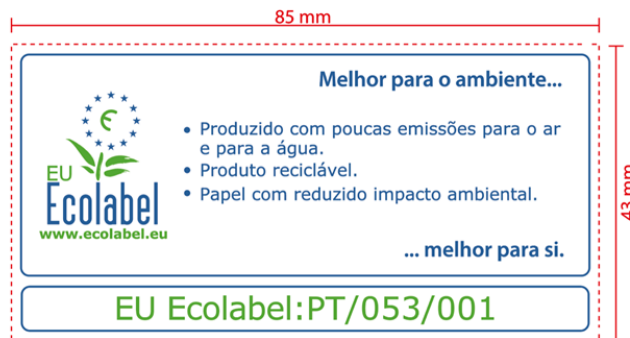
CB PT proposal:

Licence number; **Font** Verdana, **Font size:** Minimum 4,5pts

### 1) Colored option



### 2) Optional logo



## 8. Logo Guidelines: Raw materials producers

EC	<p>Logo Guidelines: Discussion on potential options for communication of ingredients that can be suitable for the EU Ecolabel products</p> <p>➤ <i>Information/Consultation</i></p>
<p>Input from CBs on this question is needed.</p>	

EC has been contacted by a company experiencing difficulties in guiding their customers on which ingredients could fit into EU Ecolabel detergents/cosmetic products. Their customers in fact rely on their expertise to help them identify the right ingredients for EU Ecolabel-compliant products.

According to the current EU Ecolabel logo guidelines – agreed by all EU Ecolabel Competent Bodies - they cannot associate the EU Ecolabel to ingredients, as EU Ecolabel is awarded by the final products. They however informed the Commission that other companies are facing similar challenges or are already marketing or associating themselves with the EU Ecolabel (which is misleading and forbidden).

The rationale behind the EU Ecolabel logo guidelines, stating that "raw material suppliers for EU Ecolabel products are prohibited from marketing or associating themselves with the EU Ecolabel in any manner," considers several factors. These factors include the requirement for products to comply with all criteria, the need for verification by Competent Bodies, and the fact that the suitability of many ingredients depends on their concentration and cumulative effects with other ingredients.

EC would like to bring this topic to the CB Forum to exchange views on potential options to allow companies (ingredients manufactures/suppliers) to communicate that they have the information available to apply for the EU Ecolabel using a sentence such as "Data for EU Ecolabel evaluation available") followed by a disclaimer (to be proposed during the CB Forum meeting).

## 9. ECAT updates

HD/ EC IT Team	Presentation of new updates in improving ECAT. Discussion on the comparison of ECAT numbers with official statistics and ECAT European Championship. ➤ <i>Information/Consultation</i>
Input from CBs on this question is needed.	

The HD will give an overview of the current ECAT updates and improvements. CBs will be asked to comment on the number of products registered in ECAT compared to the official statistics. Also, the ECAT European Championship will take place! Move fast to get a place on the winner's podium, by uploading your products and licences within ECAT and using the Bulk Upload Tool.

## 10. ECAT as a tool for submission of EU Ecolabel applications

EC/all CBs	Discussion on ECAT opportunities as a tool for EU Ecolabel applications in the future ➤ <i>Discussion</i>
Input from CBs is needed.	

The EC would like to discuss with CBs the possibility to use ECAT Admin to submit the full application to the corresponding CB (by filling the information and attaching all supporting documents). In particular, how could such application system be compatible with some CBs' own system of applications' handling?

## 11. AOB & conclusion of the CB Forum

all CBs	Any other business and conclusion ➤ <i>Information/consultation</i>
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