CRITERIA FOR THE ENVIRONMENTAL LABELING OF HAND DISHWASHING DETERGENTS

ARTICLE 1- These criteria are regulated within the scope of Environmental Label Regulation dated 19.10.2018 and numbered 30570.

ARTICLE 2- The product group of hand dishwashing detergent consists of detergent products produced and marketed for hand-washing items such as glassware, plates, and kitchenware, including cutlery, pots, pans, and containers. The product group includes products for both private and commercial use. Hand dishwashing detergent products are a mixture of chemical substances and should not contain microorganisms deliberately added by the manufacturer. The scope of the product group shall comply with the provisions of the Regulation on Detergents published in the Official Gazette dated 27/01/2018 and numbered 30314.

ARTICLE 3- Within the scope of the Environmental Label Regulation, the criteria specified in this document must be fulfilled in order to be given an environmental label for the products in the hand dishwashing detergent product group.

ARTICLE 4- The assessment and verification requirements regarding the environmental label criteria determined for the hand dishwashing detergent product group will be valid for 5 (five) years. The criteria may be updated when deemed necessary by the Environmental Labeling Board within a five-year period. The criteria's validity period can be extended with the Environmental Labeling Board's approval.

Assessment and Verification Requirements

(a) Requirements

Assessment and verification requirements for each criterion have been determined.

When a statement, document, analysis, test report, or other evidence is requested from the applicant to prove its compliance with the criteria, these documents requested in accordance with the current situation can be issued by the applicant and/or his supplier/suppliers and/or their supplier/suppliers.

In accordance with the situation, a method different from the test methods determined for each criterion may be used if the equivalence is accepted by the Ministry.

The tests should be carried out in laboratories that meet the general requirements of the ISO 17025 standard and are duly accredited, as stated in Annex-1 of the Regulation on Detergents published in the Official Gazette dated 27/01/2018 and numbered 30314. The Ministry recognizes the tests performed by laboratories accredited by an accreditation body that is a party to the International Laboratory Accreditation Association (ILAC) - Mutual Recognition Agreement (MRA) according to TS EN ISO/IEC 17025. TÜRKAK accredited organizations can be accessed at https://secure.turkak.org.tr/kapsam/search. If it is proved that there is no

accredited institution for the test technique, which is mandatory within the scope of assessment and verification criteria, TS EN ISO/IEC 17025 accreditation criterion is not required. If deemed appropriate, the Ministry may request supporting documents and perform independent verification.

When generating data for the classification of substances or mixtures, the second 28848 published in the Official Gazette dated 11.12.2013 ‘of substances and mixtures physicochemical, toxicological, and ecotoxicological test methods to be applied in determining the properties on the regulations’ provisions or procedures in accordance with internationally recognized scientific principles or internationally validated methods should be taken into consideration.

The applicant shall have fulfilled the necessary obligations within the scope of the Product Safety and Technical Regulations Law No. 7223, as well as the Environmental Law and the current legislation enacted based on this law. In this respect, it is obliged to submit the EIA Decision, Environmental Permit, Zero Waste Certificate, Waste Management Plan, and other documents requested by the Ministry.

It is necessary to demonstrate the toxicity and biodegradability of the chemicals and mixtures used in this product group in aquatic environments. For this, the "EU Commission Detergent Content Database" (Detergent Ingredient Database - DID list) has been developed, and this database contains the most used substances in detergent and cosmetic formulations. This list will be used to derive the necessary data for calculations of the Critical Dilution Volume (CDV) and to evaluate the biodegradability of the substances used in the product. For substances not on the DID list, guidance will be provided on how to obtain relevant data.

List of all substances used in the product; chemical name, CAS no., DID no. (obtained from the DID list) and the amount in the final product formulation, indicating its function and form (including water-soluble films if used) shall be submitted to the competent authority. In the studies to be carried out on this subject, the content data document stipulated in the C section of Annex-7 of the Regulation on Detergents published in the Official Gazette on 27/01/2018 and numbered 30314 should be acted upon.

Preservatives, fragrances, and coloring agents shall be specified regardless of their concentration. Other substances used in the product should be specified when in concentrations of 0.010% by weight or higher.

All substances in the form of nanomaterials shall be clearly identified in the list with the word 'nano' in parentheses.

In accordance with the Regulation on the Registration, Evaluation, Authorization and Restriction of Chemicals, published in the Official Gazette dated 23/06/2017 and numbered 30105, Safety Data Sheet (SDS) will be provided for each listed substance. If SDS is not available for a single substance because it is part of a mixture, the applicant shall provide the SDS of the mixture.

(b) Measurement thresholds

Compliance with the ecological criteria is required for all ingoing substances that are present above the limits specified in Table 1.

Table 1 Threshold levels applicable to ingoing substances by criterion for hand dishwashing detergents (% weight by weight)

Criterion name		**Surfactants**	**Preservatives**	**Colouring agents**	**Fragrances***	**Other (e.g. enzymes)**
Toxicity to aquatic organisms		≥ 0.010	no limit*	no limit*	no limit*	≥ 0.010
Biodegradability	Surfactants	≥ 0.010	N/A	N/A	N/A	N/A
	Organics	≥ 0.010	no limit*	no limit*	no limit*	≥ 0.010
Sustainable sourcing of palm oil		≥ 0.010	N/A	N/A	N/A	≥ 0.010
Excluded or limited substances	Excluded and limited substances	no limit*	no limit*	no limit*	no limit*	no limit*
	Hazardous substances	≥ 0.010	≥ 0.010	≥ 0.010	≥ 0.010	≥ 0.010
	SVHCs	no limit*	no limit*	no limit*	no limit*	no limit*
	Fragrances	N/A	N/A	N/A	no limit*	N/A
	Preservatives	N/A	no limit*	N/A	N/A	N/A
	Colouring agents	N/A	N/A	no limit*	N/A	N/A
	Enzymes	N/A	N/A	N/A	N/A	no limit*

* "no limit" means: all substances intentionally added, by-products, and impurities from raw materials (analytical limit of detection) regardless of the concentration.
N/A: Not Applicable

REFERENCE DOSAGE

The dosage below shall be taken as the reference dosage for calculations aimed at documenting compliance with the Turkish Environmental Label criteria and testing the cleaning ability:

The highest dosage recommended by the manufacturer for 1 liter of washing water to be used to clean normally soiled dishes (indicated as g/L of washing water or ml/L of washing water.)

Assessment and validation: The applicant shall submit the product label or user instruction information containing dosage instructions for use.

CRITERIA

Criterion 1 Toxicity to the Aquatic Organisms

The critical dilution volume of the product estimates the impact of a product on aquatic freshwater ecosystems by calculating the natural water volume required to dilute some amount of the product (or functional unit) to the concentration at which it does not cause any foreseeable detrimental effects on the water. The critical dilution volume of the product ($CDV_{chronic}$) shall not exceed the following limits for the reference dosage.

Product Type	**Limit CDV (L/L of washing water)**
Hand Dishwashing Detergents	2500

Assessment and verification: The applicant shall provide the $CDV_{chronic}$ calculation of the product. $CDV_{chronic}$ is calculated for all ingredients (i) in the product using the following equation:

$$CDV_{chronic} = \sum CDV_{(i)} = 1000 * \sum dosage\ (i) * \frac{DF(i)}{TF_{chronic}(i)}$$

Where;
dosage (i): Weight (g) of the substance (i) in the reference dosage,
DF(i): Degradation factor for the substance (i);
TFchronic (i): Chronic toxicity factor for the substance (i).

The values of DF(i) and $TF_{chronic}$ (i) shall be as given in the most updated Part A of the DID list. If an ingoing substance is not included in Part A, the applicant shall estimate the values following the approach described in Part B of that list and attach the associated documentation.

Criterion 2 Biodegradability

(a) Biodegradability of Surfactants

All surfactants shall be readily degradable (aerobically).

In addition, all surfactants classified as hazardous to the aquatic environment (Acute Category 1 (H400) or Chronic Category 3 (H412)), in accordance with the Regulation on Classification, Labeling and Packaging of Substances and Mixtures published in the Official Gazette dated 11/12/2013 and the second numbered 28848 shall be anaerobically biodegradable.

(b) Biodegradability of Organic Compounds

The organic matter content in the product that is not aerobically biodegradable (not readily biodegradable, aNBO) or anaerobically non-biodegradable (anNBO) shall not exceed the following limits specified for the reference dosage:

Product Type	**aNBO (g/L of washing water)**	**anNBO (g/L of washing water)**
Hand Dishwashing Detergents	0.03	0.08

The latest version of the DID list is available from the links below.
http://ec.europa.eu/environment/ecolabel/documents/did_list/didlist_part_a_en.pdf
http://ec.europa.eu/environment/ecolabel/documents/did_list/didlist_part_b_en.pdf

Assessment and verification: The applicant shall provide the necessary documentation for the degradability of surfactants and the calculation of aNBO and anNBO in the product.

For the degradability of surfactants and the aNBO and anNBO values of organic compounds, reference shall be made to the most updated DID list.

For substances not included in Part A of the DID list, the relevant information from the literature or other sources showing that they are aerobic and anaerobically biodegradable as described in Part B of that list or appropriate test results shall be provided. In the tests to be applied to determine the biodegradability of surfactants, the methods specified in the Annex-3 of the Regulation on Detergents published in the Official Gazette on 27/01/2018 and numbered 30314 shall be followed.

In the absence of the degradability documentation described above, substances other than surfactants may be exempted from the anaerobic degradability requirement if one of the following three alternatives is fulfilled:

(1) it is readily degradable and has low adsorption (A < %25);
(2) it is readily degradable and has high desorption (D > %75);
(3) it is readily degradable and non-bioaccumulating[1].

For adsorption/desorption tests, Batch Adsorption/Desorption method using Equilibrium Model, that is provided in C.18 in Annex-I Section C of the Regulation on the Test Methods to be Applied in Determining the Physico-Chemical, Toxicological and Ecotoxicological Properties of Substances and Mixtures published in the Official Gazette dated 11.12.2013 and numbered 28848 with the second repetition, shall be followed.

Criterion 3 Sustainable Sourcing of Palm Oil, Palm Kernel Oil and Their Derivatives

Ingoing substances used in the products which are derived from palm oil or palm kernel oil shall be sourced from plantations that meet the requirements of a certification scheme for sustainable production that is based on multi-stakeholder organizations that has a broad membership, including NGOs, industry and government and that addresses environmental impacts including on soil, biodiversity, organic carbon stocks and conservation of natural resources.

Assessment and verification: The applicant shall provide evidence through third-party certificates and chain of custody that palm oil and palm kernel oil used in the manufacturing of the ingoing substances originates from sustainably managed plantations.

Certificates accepted shall include Roundtable for Sustainable Palm Oil (RSPO) (by identity preserved segregated or mass balance) or any equivalent or stricter sustainable production scheme.

For chemical derivatives of palm oil and for palm kernel oil, it shall be acceptable to

(1) If BCF < 100 or log K_{ow} < 3.0, the substance in question is considered non-bioaccumulative. If both BCF and log K_{ow} values are available, the highest measured BCF value will be used. These values can also be accessed from SDSs.

demonstrate sustainability through the book and claim systems such as GreenPalm certificates or equivalent by providing the Annual Communications of Progress (ACOP) declared amounts of procured and redeemed GreenPalm certificates during the most recent annual trading period.

Criterion 4 Excluded and restricted substances

(a) Specified excluded and restricted substances

(i) **Excluded substances**

The substances indicated below shall not be included in the product formulation regardless of concentration:

- Alkylphenol ethoxylates (APEOs) and other alkylphenol derivatives;
- Atranol;
- Chloroatranol;
- Diethylenetriaminepentaacetic acid (DTPA);
- Ethylenediaminetetraacetic acid (EDTA) and its salts;
- Formaldehyde and its releasers (e.g. 2-bromo-2-nitropropane-1,3-diol, 5-bromo-5-nitro-1,3- dioxane, sodium hydroxyl methyl glycinate, diazolidinylurea), with the exception of impurities of formaldehyde in surfactants based on polyalkoxy chemistry up to a concentration of 0.010% weight by weight in the ingoing substance;
- Fragrances (for professional use only);
- Glutaraldehyde;
- Hydroxyisohexyl 3-cyclohexene carboxaldehyde (HICC);
- Microplastics (< 5 mm insoluble macromolecular plastics);
- Nanosilver;
- Nitromusks and polycyclic musks;
- Phosphates;
- Per-fluorinated alkylates;
- Quaternary ammonium salts not readily biodegradable;
- Reactive chlorine compounds;
- Rhodamine B;
- Sodium hydroxyl methyl glycinate;
- Triclosan;
- 3-iodo-2-propynyl butylcarbamate.

Assessment and verification: The applicant shall provide a signed declaration of compliance supported by declarations from suppliers, if appropriate, confirming that the listed substances have not been included in the product formulation regardless of concentration.

(ii) Restricted substances

The substances listed below shall not be included in the product formulation above the concentrations indicated:

- 2-methyl-2H-isothiazol-3-one: 0.0015% weight by weight;
- 1,2-Benzisothiazol-3(2H)-one: 0.0050 % weight by weight;

– 5-chloro-2-methyl-4-isothiazolin-3-one/2-methyl-4-isothiazolin-3-one: 0.0015% weight by weight;

Total phosphorus (P) content calculated as elemental P shall be limited to 0.08 g/L of washing water.

Assessment and verification: The applicant shall provide the following documents:

a. If isothiazolinones are used, a signed declaration of compliance supported by declarations from suppliers, if appropriate, confirming that the content of isothiazolinones used is equal to or lower than the limits set;
b. A signed declaration of compliance supported by declarations from suppliers, if appropriate, confirming that the total amount of elemental P is equal to or lower than the limits set. The declaration shall be supported by the calculations of the product's total P-content;
c. If appropriate, signed declarations of conformity, supported by the declarations received from suppliers, confirming that the fragrance allergens included in Annex-III of the Cosmetic Regulation dated 23.05.2005 and numbered 25823 are not present in more than the determined limits. For professional products, a signed declaration of non-presence of fragrances shall be provided.

(b) Hazardous substances

(i) Final product

The final product, as defined within the scope of Regulation on Classification, Labeling and Packaging of Substances and Mixtures Published in Official Gazette dated 11/12/2013 and numbered 28848 and according to the list in Table 2, shall not be classified and labeled as acutely toxic, a specific target organ toxicant, a respiratory or skin sensitizer, carcinogenic, mutagenic or toxic for reproduction, or hazardous to the aquatic environment.

(ii) Ingoing substances

The product, as defined within the scope of Regulation on Classification Annex-I, Labeling and Packaging of Substances and Mixtures Published in Official Gazette dated 11/12/2013 and numbered 28848 and according to the list in Table 2, shall not contain any substance at a concentration limit of 0.010% by weight or above, shall not be meeting the criteria for classification or labeling as acute toxic, certain target organ toxicity, respiratory or skin sensitizer, hazardous to the aquatic environment, carcinogenic and mutagenic or toxic to reproduction.

In cases where stricter controls are required, the concentration limits determined within the scope of the Regulation on Classification, Labeling and Packaging of Substances and Mixtures published in the Official Gazette dated 11/12/2013 and numbered 28848 shall apply.

Table 2 Restricted hazard classifications and their categorization

Acute toxicity	
Categories 1 and 2	**Category 3**
H300 Fatal if swallowed	H301 Toxic if swallowed

H310 Fatal in contact with skin	H311 Toxic in contact with skin
H330 Fatal if inhaled	H331 Toxic if inhaled
H304 May be fatal if swallowed and enters airways	EUH070 Toxic by eye contact
Specific target organ toxicity	
Category 1	**Category 2**
H370 Causes damage to organs	H371 May cause damage to organs
H372 Causes damage to organs through prolonged or repeated exposure	H373 May cause damage to organs through prolonged or repeated exposure
Respiratory and skin sensitization	
Category 1A/1	**Category 1B**
H317 May cause allergic skin reaction	H317 May cause allergic skin reaction
H334 May cause allergy or asthma symptoms or breathing difficulties if inhaled	H334 May cause allergy or asthma symptoms or breathing difficulties if inhaled
Carcinogenic, mutagenic or toxic for reproduction	
Categories 1A and 1B	**Category 2**
H340 May cause genetic defects	H341 Suspected of causing genetic defects
H350 May cause cancer	H351 Suspected of causing cancer
H350i May cause cancer by inhalation	
H360F May damage fertility	H361f Suspected of damaging fertility
H360D May damage the unborn child	H361d Suspected of damaging the unborn child
H360FD May damage fertility. May damage the unborn child	H361fd Suspected of damaging fertility. Suspected of damaging the unborn child
H360Fd May damage fertility. Suspected of damaging the unborn child	H362 May cause harm to breast fed children
H360Df May damage the unborn child. Suspected of damaging fertility	
Hazardous to the aquatic environment	
Categories 1 and 2	**Categories 3 and 4**
H400 Very toxic to aquatic life	H412 Harmful to aquatic life with long-lasting effects
H410 Very toxic to aquatic life with long-lasting effects	H413 May cause long-lasting effects to aquatic life
H411 Toxic to aquatic life with long-lasting effects	
Hazardous to the ozone layer	
H420 Harms public health and the environment by destroying the ozone layer in the upper atmosphere	

This criterion is excluded from the registry within the scope of Clauses (a) and (b) of the Fifth Clause of Article 2 of the Regulation on the Registration, Evaluation, Authorization and Restriction of Chemicals, which was published in the Official Gazette dated 23/06/2017 and secondly numbered 30105. It does not apply to substances that are exempted and included in Annex-4 and Annex-5 of the same regulation. To determine if this exemption applies, the applicant shall screen for substances present at a concentration above 0.010% by weight.

Substances and mixtures in Table 3 are exempt from item (b)(ii) of Criterion 4.

Table 3 Derogated substances

Substance	**Hazard Statement**
Surfactants	H400 Very toxic to aquatic life
	H412 Harmful to aquatic life with long-lasting effects
Subtilisin	H400 Very toxic to aquatic life
	H411 Toxic to aquatic life with long-lasting effects
Enzymes (*)	H317 May cause allergic skin reaction
	H334 May cause allergy or asthma symptoms or breathing difficulties if inhaled
NTA as an impurity in MGDA and GLDA (**)	H351 Suspected of causing cancer

(*) Including stabilisers and other auxiliary substances in the preparations
(**) In concentrations lower than 0.2 % in the raw material as long as the total concentration in the final product is lower than 0.10 %.

Assessment and verification: The applicant shall demonstrate compliance with this criterion for the final product and for any ingoing substance at a concentration greater than 0.010% weight by weight in the final product. The applicant shall provide a signed declaration of compliance supported by declarations from suppliers, if appropriate, or SDS confirming that none of these substances meets the criteria for classification with one or more of the hazard statements listed in Table 2 in the form(s) and physical state(s) in which they are present in the product.

Listed in Annex IV and Annex V of the Regulation on the Registration, Evaluation, Authorization and Restriction of Chemicals, which entered into force by being published in the Official Gazette dated 23/06/2017 and numbered 30105 with repetition, for substances exempted from registration, a declaration to that effect by the applicant shall suffice for eligibility.

The applicant shall provide a signed declaration of compliance supported by declarations from suppliers, if appropriate, or SDS confirming the presence of ingoing substances that fulfill the derogation conditions.

(c) Substances of very high concern (SVHCs)

The final product cannot contain substances of high importance as defined in Article 47 of the Regulation on Registration, Evaluation, Authorization and Restriction of Chemicals.

Assessment and verification: The applicant shall provide a signed declaration of conformity, if applicable, confirming the absence of substances of high concern, supported by statements from suppliers and SDSs.

(d) Fragrances

All substances added to the product as fragrance shall be produced and processed in accordance with the International Fragrance Association (IFRA)[2] codes of practice. The recommendations of IFRA standards regarding prohibition, restricted use, and purity criteria specified for substances shall be followed by the manufacturer.

Fragrances shall not be used in hand dishwashing detergents for professional use.

Assessment and verification: The supplier or fragrance manufacturer, as the case may be, shall provide a signed declaration of conformity.

(e) Preservatives

(i) The product may only include preservatives in order to preserve the product and in the appropriate dosage for this purpose alone. This does not refer to surfactants which may also have biocidal properties.

(ii) The product may contain preservatives provided that they are not bio-accumulating. A preservative is considered to be not bio-accumulating if the BCF is < 100 or log K_{ow} is < 3.0. If both the BCF and log K_{ow} values are available, the highest measured BCF value shall be used.

(iii) It is prohibited to claim or suggest on the packaging or by any other communication that the product has an antimicrobial or disinfecting effect.

Assessment and verification: The applicant shall provide a signed declaration of compliance supported by declarations from suppliers, if appropriate, along with the SDS of any preservative added and information on its BCF or log K_{ow} values. The applicant shall also provide artwork of the packaging.

(f) Colouring agents

Coloring agents in the product shall not be bioaccumulative.

Colorants with BCF < 100 or log K_{ow} < 3.0 are considered non-bioaccumulative. If both BCF and log K_{ow} values are available, the highest measured BCF value shall be used. In the case of coloring agents approved for use in foods, documentation of the potential for bioaccumulation is not required.

Assessment and verification: The applicant shall provide a signed declaration of conformity or documentation showing that the coloring agents are suitable for food use, providing information on all coloring agents added to the product and their BCF or log K_{ow} values, supported by declarations from suppliers as well as SDSs.

(g) Enzymes

Only encapsulated enzymes (solid) and enzyme liquids/slurries shall be used.

[2] Available on the IFRA website: http://www.ifraorg.org.

Assessment and verification: The applicant shall provide a signed declaration of conformity, if applicable, showing all enzymes added to the product and supported by declarations from suppliers as well as SDSs.

(h) Corrosive properties

The final product, in accordance with the Regulation on Classification, Labeling and Packaging of Substances and Mixtures published in the Official Gazette dated 11/12/2013 and repeated numbered 28848, with the expression "H314 Causes severe skin burns and eye damage", "Skin corrosive", category 1A, shall not be classified as a 1B, 1C mixture.

Assessment and verification: The applicant shall provide the competent body with the exact concentrations of all ingoing substances used in the product, either as part of the formulation or as part of any mixture included in the formulation, that are classified as 'Corrosive' (C) with H314 in accordance with Regulation on Classification, Labeling and Packaging of Substances and Mixtures published in the Official Gazette dated 11/12/2013 and numbered 28848 with repetition, along with the product SDS.

Criterion 5 – Packaging

(a)Weight/utility ratio (WUR)

The weight/utility ratio (WUR) of the product shall be calculated for the primary packaging only and shall not exceed the following values for the reference dosage.

Product Type	**WUR (g/L of washing water)**
Hand Dishwashing Detergents	0.6

Primary packaging made of more than 80 % recycled materials is exempted from this requirement.

Assessment and verification: The applicant shall provide the WUR calculation of the product. If the product is sold in different packages (i.e. in different volumes), calculations shall be made and presented for each package size for which the Turkish Environmental Label shall be given.

WUR is calculated as follows:

$$WUR = \sum((W_i + U_i)/(D_i + R_i))$$

Where;
W_i: weight (g) of the primary packaging (i);
U_i: weight (g) of non-post-consumer recycled packaging in the primary packaging (i). $U_i = W_i$ unless the applicant can prove otherwise;
D_i: number of reference doses contained in the primary packaging (i);
R_i: refill index. $R_i = 1$ (packaging is not reused for the same purpose) or $R_i = 2$ (if the applicant can document that the packaging component can be reused for the same purpose and they sell refills).

The applicant shall provide, together with the relevant documents, a signed declaration of conformity confirming the content of the post-consumption recycled material. If the raw material used to manufacture the packaging is collected from packaging manufacturers at the distribution or consumer stage, the packaging is considered post-consumer recycled packaging.

(b) Design for recycling

Plastic packaging shall be designed to facilitate effective recycling by avoiding potential contaminants and incompatible materials known to interfere with separation or reprocessing or reduce recycling quality. The label or cladding, closure and barrier coatings, if any, shall not contain the materials and components listed in Table 4, alone or in combination. Pump mechanisms (including sprays) are exempt from this requirement.

Table 4 Materials and components excluded from packaging elements

Packaging element	**Excluded materials and components***
Label or sleeve	- PS label or sleeve in combination with a PET, PP or HDPE bottle - PVC label or sleeve in combination with a PET, PP or HDPE bottle - PETG label or sleeve in combination with a PET bottle - Any other plastic materials for sleeves/labels with a density > 1 g/cm^3 used with a PET bottle - Any other plastic materials for sleeves/labels with a density < 1 g/cm^3 used with a PP or HDPE bottle - Labels or sleeves that are metallized or are welded to a packaging body (in mould labelling)
Closure	- PS closure in combination a with a PET, HDPE or PP bottle - PVC closure in combination with a PET, PP or HDPE bottle - PETG closures or closure material with a density > 1 g/cm^3 in combination with a PET bottle - Closures made of metal, glass or EVA which are not easily separable from the bottle - Closures made of silicone. Silicone closures with a density < 1 g/cm^3 in combination with a PET bottle and silicone closures with a density > 1g/cm^3 in combination with PEHD or PP bottle are exempted. - Metallic foils or seals which remain fixed to the bottle or its closure after the product has been opened
Barrier coatings	Polyamide, functional polyolefins, metallised and light-blocking barriers
* EVA – Ethylene Vinyl Acetate, HDPE – High-density polyethylene, PET – Polyethylene terephthalate, PETG – Polyethylene terephthalate glycol-modified, PP – Polypropylene, PS – Polystyrene, PVC – Polyvinylchloride	

Assessment and verification: The applicant shall provide a signed declaration of compliance specifying the material composition of the packaging including the container, label or sleeve, adhesives, closure and barrier coating, as appropriate, along with photos or technical drawings of the primary packaging.

Criterion 6 –Fitness for use

The product shall have satisfactory washing performance at the lowest temperature and dose recommended by the manufacturer for a certain water hardness. Performance is measured by

evaluating the product's cleaning ability (ability to remove dirt/cleaning dishes) and cleaning capacity parameters and compared to a reference product.

As a basic requirement, the product is expected to perform at least as good or higher than the reference product. In order for the product's performance to be considered successful, at least 80% of the test rounds (for example, 4 rounds out of 5 rounds) shall yield a positive result (as good as or better than the reference product) for the product being tested.

Alternatively, the applicant can use statistical methods and demonstrate that the tested product is as good or better than the reference product for at least 80% of the test rounds at a one-sided 95% confidence interval.

With regard to laboratory qualifications, the requirements set out in the criteria document apply.

- The reference product shall be tested at the lowest recommended dose as indicated on the packaging. If there are no recommended dosing instructions for the reference product, the dose is adjusted in the same way as for the test product.
- The test product shall be tested at the lowest recommended dose.
- The reference product shall be selected among the hand dishwashing detergents sold in Turkey at the time of the test and known as the most established/market leader.
- The reference product shall be different from the product targeted for the Turkish Environmental Label and is produced by a manufacturer other than the applicant manufacturer.
- The reference product shall be purchased specifically for testing. Products intended for the professional market shall be tested against another professional product and similarly a product intended for personal use shall be compared with another product intended for personal use. Performance testing is done against a professional product if the product is marketed for both professional and personal use.

The results of nationally or globally accepted performance tests can also be submitted by the applicant confirming that the criteria of suitability for use are met.

Assessment and verification: The applicant shall provide documents showing that the product has been tested under the conditions specified in the criteria and that the results have reached at least the required minimum washing performance. The applicant shall also provide documentation, if appropriate, demonstrating compliance with the laboratory requirements contained in the relevant harmonized standards for testing and calibration laboratories. Test results for the suitability of the product for use are also considered in the verification process.

Criterion 7 – User information

The product shall be accompanied by instructions for proper use so as to maximize product performance and minimize waste and reduce water pollution and use of resources. These instructions shall be legible or include graphical representation or icons and include information on the following:

(a) Dosage instructions

The applicant shall take suitable steps, provide dosage instructions and an appropriate dosing system (e.g. cap) to assist consumers in setting the recommended dosage.

Dosage instructions shall include the recommended dosage for at least two levels of contamination and the effect of water hardness, if any, on dosage.

If available, indicate the most common water hardness in the area where the product is planned to be marketed or where this information can be found.

(b) Packaging disposal information

The primary packaging shall include information on the reuse, recycling, and correct disposal of packaging.

(c) Environmental information

The primary packaging shall have text stating the importance of using the correct dose and the lowest recommended temperature to minimize energy and water consumption and reduce water pollution.

Assessment and verification: The applicant shall provide a signed declaration of compliance along with a sample of the product label.

Criterion 8 –Information appearing on the Turkish Environmental Label

The following information shall be placed on the product along with the environmental label:

The environmental label shall be placed on the product packaging in dimensions of 2*2 cm. Below the label; the document number in 6-point font and "The use of Environmental Label in this product has been approved by the Ministry of Environment, Urbanisation and Climate Change in accordance with the Environmental Label Regulation published in the Official Gazette dated 19.10.2018 and numbered 30570 due to its environmental performance." statement should be included.

If the product is approved during the application process, it can be included in the following statements.

- Limited impact on the aquatic environment
- Sustainable use of raw materials,
- Restriction of harmful chemicals in the manufacturing process.

Assessment and verification: The applicant shall provide a sample of the product label or the design of the packaging on which the Turkish Environmental Label is placed, together with a signed declaration of conformity.