

About Nordic Swan Ecolabelled
Textile services



Consultation draft

Version 4.0

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075 Textile services, version 4.0, consultation draft

Note. The original background document contained large sections of text in several different Scandinavian languages. This was because the Nordic Ecolabelling's criteria are developed in Nordic cooperation, with all countries involved in the process.

Nordic Ecolabelling considers that, as long as it concerns large continuous text sections, this variation in the language used can be considered as a confirmation of the Nordic cooperation that is one of the strengths of developing the Nordic Ecolabelling criteria.

Addresses

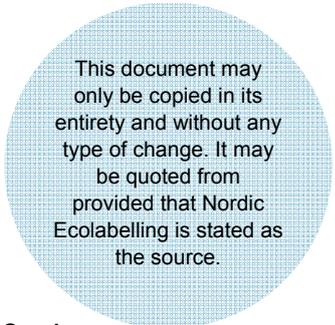
In 1989, the Nordic Council of Ministers decided to introduce a voluntary official ecolabel, the Nordic Swan Ecolabel. These organisations/companies operate the Nordic Ecolabelling system on behalf of their own country's government. For more information, see the websites:

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1 Summary

Textile services cover many companies and employees in the Nordic countries. In addition, hundreds of thousands of people in the Nordic countries use hired textiles every day. Textile services includes laundry and delivery of workwear, hospital textiles, textiles for hotels and restaurants, cloth hand towel rolls, mats and mops – to name but a few examples. Hiring textiles is the alternative to owning textiles or using disposable items. With the growing trend towards circular business models, the future for the textile services sector continues to look bright.

A Nordic Swan Ecolabelled textile service:

- Is energy efficient and has a low climate impact.
- Consumes limited amounts of water and uses the planet's resources sparingly.
- Its consumption of chemicals complies with stringent environmental and health requirements. For example, detergents do not contain optical brighteners, fragrances or DADMAC. Use of chemicals is limited.
- Reduces the environmental impact of transport involved in distribution.
- Buys in textiles at least 85% of which are ecolabelled or comply with the Oeko-Tex 100 standard.

The first criteria for Nordic Swan Ecolabelling of textile services were approved in 2001 but it was possible to Nordic Swan Ecolabel laundry of cloth hand towel rolls as early as 1996. In 2017–2018 the criteria have been revised from generation 3 to generation 4. The most important changes as a consequence of the revision are presented below.

- The requirements on energy and greenhouse gases have been tightened up. The energy and CO₂ factor for electricity has been updated to better reflect the Nordic energy market.
- The chemicals requirements have been updated in line with applicable legislation. Requirements on CDV and point score requirements on chlorine have been tightened up. A new requirement has been introduced prohibiting phosphates. In addition, a mandatory requirement for the proportion of ecolabelled laundry detergents is introduced.
- The textile category Hotels has been divided into two sub-categories, one for traditional hotel linen and one for linen for holiday cottage accommodation. In addition, the textile category Workwear for industrial/kitchen/butchery and equivalent use has been expanded with the addition of a new sub-category: Textiles for clean rooms.
- The requirements on transport have been tightened up and it has been made clear that the requirements apply whether or not the textile service uses its own drivers/vehicles or whether the service is bought in from outside.
- A point score requirement has been introduced concerning textile production of synthetic material and emissions of microplastics in waste water.
- The existing information requirement on disposal has been tightened up. In addition, a point score requirement that encourages preventive

measures against disposal, and re-use and material recovery has been introduced.

- A new requirement has been introduced prohibiting phthalate plasticisers in mats that are bought new.
- Requirements have been introduced on working conditions for own employees and contractors/employment agencies.

Energy consumption is linked to a number of different environmental problems and tightening up the energy requirement is expected to lead to environmental benefits in these areas. Tightening up the greenhouse gas requirement brings environmental gains in the form of reduced climate impact from textile services. Manufacturing textiles, including raw ingredient production, produces a significant environmental burden, which means that initiatives relating to textiles and disposal involve environmental benefits. Washing synthetic textiles is a source of emissions of microplastics. The new point score requirement may help to draw the attention of the industry to this issue, give Nordic Ecolabelling an overview of the types of fibres used, and, in the best case scenario, help to reduce emissions of microplastics.

2 Basic facts about the criteria

This chapter is an introduction to the criteria for Nordic Swan Ecolabelling of textile services and contains a description of the definition of the product group, a brief justification of why Nordic Ecolabelling has these criteria and a description of their version history and validity.

Products that can be labelled

The product group includes all textile services. A chain/group with several units can apply for a licence for one or more units. Each unit must fulfil the requirements and have its own licence. If all the units in a chain/group in a country are Nordic Swan Ecolabelled, they can market themselves as a Nordic Swan Ecolabelled chain/group in that country.

For cloth hand towel rolls, either the whole laundry can be Nordic Swan Ecolabelled or only the part of the laundry that handles cloth hand towel rolls.

The criteria do not apply to companies that only offer dry cleaning. The criteria for alternative dry cleaning are available for these companies.

Justification for Nordic Ecolabelling

Nordic Ecolabelling applies an evaluation model known as the RPS model (Relevance, Potential, Steerability) and a holistic, life cycle perspective. R – Relevance is assessed on the basis of which environmental problems the product group causes and how extensive those problems are. P – Potential is assessed in terms of potential environmental benefits within the product group and S – Steerability is a measurement of how the environmental aspects can be influenced by ecolabelling.

Hundreds of thousands of people in the Nordic countries use hired textiles every day. Textile services includes laundry and delivery of workwear, hospital textiles, textiles for hotels and restaurants, cloth hand towel rolls, mats and mops – to name but a few examples. It is environmentally relevant to have criteria for

Nordic Swan Ecolabelling of textile services. Life cycle analyses show that textile services are associated with environmental problems in the following areas: The laundry's energy consumption and climate impact, chemicals consumption, water consumption, purchasing of textiles, distribution and waste from discarded textiles. At the same time, data collected shows that there is a difference in the environmental performance of different laundries, which means there is potential for environmental improvements. Steerability is also high, as the laundry has a direct opportunity to influence the most important parts of the life cycle.

Nordic Ecolabelling sets requirements in the areas where there is RPS. In addition to this, Nordic Ecolabelling is focussed on setting requirements in the following environmentally strategic areas: Biodiversity, climate and energy, chemicals and resource use/resource efficiency.

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- Is energy efficient and has a low climate impact.
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- Its consumption of chemicals complies with stringent environmental and health requirements. For example, detergents do not contain optical brighteners, fragrances or DADMAC. Use of chemicals is limited.
- Reduces the environmental impact of transport involved in distribution.
- Buys in textiles at least 85% of which are ecolabelled or comply with the Oeko-Tex 100 standard.

Version and validity of the criteria

The first criteria for Nordic Swan Ecolabelling of textile services were approved in 2001 but it was possible to Nordic Swan Ecolabel laundry of cloth hand towel rolls as early as 1996. The criteria have been revised three times since 2001. In the first revision, they were merged with the criteria for cloth hand towel rolls.

The period of validity of the current criteria for textile services (version 4.0) is 14 March 2018 – 31 March 2023.

Nordic Swan Ecolabel licences in the Nordic market

In May 2017 there were 76 licences distributed as follows: Denmark 25, Finland 1, Norway 19 and Sweden 31. Nordic Ecolabelling has had a major impact in the Danish, Norwegian and Swedish market. The number of licences increased in all of these countries during the validity of the previous generation of the criteria. Nordic Swan Ecolabelling of textile services has not attained the same impact in the Finnish and Icelandic markets. See Chapter 2 for a description of the Nordic textile services market.

3 The Nordic Market

This chapter provides a brief description firstly of how the industry is organised in the Nordic market, and secondly of the market's development.

The Nordic market

Over the past approximately 45 years, the industrial laundries in Europe and in the Nordic countries have been characterised by consolidation, in other words,

both laundry chains and smaller typically private laundries have been bought up by larger actors in the industry (Arndt, 2002). The structure of the sector has thus developed towards fewer larger and more specialised production units gathered within larger groups (Søgaard-Pedersen, 2004). This trend has continued in recent years. The Danish company De Forenede Dampvaskerier has recently bought the Swedish Textilia koncern and it was recently announced in the media that the French laundry group Elis has reached agreement with Berendsen on a takeover (Stothard, 2017).

The same trend has been seen within the Nordic countries and large actors such as Berendsen Group have operations that span national borders, in Denmark, Sweden, Norway and Finland, while Finske Lindström (including Comforta) has operations in Finland and Sweden. These two large Nordic textile service operations also have activities outside the Nordic region. Other international actors such as CWS-boco and Rentokil Initial have also become established in the Nordic textile services market.

In Denmark, the two largest actors in the market (Berendsen Tekstil Service and De Forenede Dampvaskerier) account for 70–80% of total sales in the sector (Danish Competition and Consumer Authority, 2009). The remaining 20–30% of sales is accounted for by approximately 95–100 small and medium-sized businesses (Danish Competition and Consumer Authority, 2009). The Danish Competition and Consumer Authority (2009) judges, with a certain amount of uncertainty, total turnover in the sector to be DKK 3–3.5 billion, which is slightly higher than the estimate reached by the industry organisation itself of about DKK 2.7 billion (DI Service, 2016). The difference may perhaps lie in the fact that the industry's own figures only concern the major professional laundries.

The Finnish textile services market has three parts: former municipal laundries, Lindström/Comforta and private laundries. There are 10–20 laundries that used to be run by municipalities but are now companies owned by municipalities or hospital districts. These laundries have in-house status and only wash textiles for their owners (> 90%). In-house status means that the owners do not need to put their laundry out to public tender and can instead use their own laundry. This means in turn that these companies never encounter a demand for Nordic Swan Ecolabelling. Lindström/Comforta is the market leader in Finland. Their income from Finnish operations is ~ EUR 200 million (global income EUR 300 million). Lindström has a 50–70% share of the Finnish market. The other private laundries represent a wide-ranging group of laundries. There are a few new, modern laundries but the majority are small, local and filled with old technology. Most of them do not meet the requirements for Nordic Swan Ecolabelling of textile services.

In Norway, the number of companies in the laundry and cleaning industry has fallen from 329 in 2011 to 230 in 2015 (Statistics Norway, 2017). However, both the number of employees (approximately 2,700) and turnover (NOK 2.3–2.6 billion) have remained stable. By far the largest chain is Nor Tekstil (700 employees and 19 laundries). Other chains include Rent-gruppen (eight laundries), Berendsen (seven laundries) and Breeze (three laundries). In addition, there are some municipally-owned hospital laundries and independent private laundries.

The Swedish laundry industry comprises approximately 300 companies employing 5,000 people between them. These figures include small dry cleaners whose business is primarily geared towards private individuals. However, a number of larger actors wash considerable amounts of dirty laundry every day: Berendsen, Rikstvätt and Textilia. The industry is characterised by strong growth. During the period 2010–2015, combined operating income rose by 24% and personnel by 14%. In 2014 the industry turned over more than SEK 4.5 billion (Swedish Textile Services Industry, 2017).

Development of the market

Below, the development of the market is described on the basis of the trends and tendencies identified during the revision.

Hiring textiles is the alternative to owning textiles or using disposable items. With the growing trend towards circular business models, the future for the textile services sector continues to look bright (ETSA, 2017).

Textile services are classically seen as a B2B (business-to-business) and B2G (business-to-government) service in which the industrial laundries number hotels, municipalities and county councils, industries and other companies among their customers. In recent years, a new branch in the B2G segment has grown stronger, namely municipalities offering their elderly residents laundry of private clothing, mainly in Denmark. This trend was already noted during the revision for generation 3 of the criteria in which the textiles category private clothing became a main category in its own right, with its own factor values. Since then, actors geared towards the consumer segment have established themselves in the market. This concerns B2C (business-to-consumer) services in which private individuals can have their clothes washed by professional laundries. One example is the Danish start-up company Washa¹, which, through its cooperation with Berendsen, offers private individuals a service in which their laundry is collected at the door, washed at a Nordic Swan Ecolabelled laundry and then delivered back to their home. A similar service is available in Sweden, known as Tvättbilen². B2C services currently account for only a small proportion of the market. However, this is a market that is expected to grow as consumer behaviours such as “outsourcing”, “on demand” and “home delivery” become increasingly common.

One clear trend in terms of technical equipment in laundries is towards greater automation in the laundry process. For example, packing of washed mops, feeding mats into the washing machine and feeding wet textiles between heated rollers is normally automated. Automation can reduce the need for staff by up to 30–40% for an individual machine. The increase in electricity consumption brought about by automation is described as being marginal. Additionally, there is a trend towards systems for internal transport, mainly through laundry bags running across the ceiling.

“No steam”, in other words where the energy is produced by smaller units at the laundry when consumption is required instead of sending steam around in pipes from a central facility (only one boiler). The advantage is greater efficiency per kg of laundered textiles. The disadvantage is that the change usually has to be made

¹ <https://dk.washa.com/>

² <http://tvattbilen.se/>

gradually which leads to the boiler being over-sized and relatively less efficient during the phasing out process.

In the field of chemicals, the clearest trend is low-temperature laundry with associated chemicals. This means a shift from thermal disinfection to chemical disinfection. The washing temperature is going down throughout the Nordic region but there are differences between the individual countries. For example, Swedish hospitals still wash at 70 °C for 10 minutes while there are Danish hospital laundries that wash at 40 °C. Lowering the washing temperature from 85 to 60 °C means a significant energy saving while a further drop to 40 °C does not involve as large gains. Washing at low temperatures makes the heat exchange less effective. The net effect of lowering the washing temperature is an energy saving, however. Another trend concerning chemicals is detergent with a focus on enzymes instead of surfactants. The technology works best on restaurant textiles and workwear and may involve lower energy consumption and less re-laundering. One challenge of enzyme-based laundry is that enzymes need longer time to work than surfactants. The laundry time is often short at industrial laundries – at about 10 minutes. Additionally, the technology is expensive and there are fears that enzymes will remain in textiles and may irritate the skin/give rise to allergies.

In general, there has been a major focus on water consumption and recovery, but according to the industry, the focus has switched to hygiene questions. At the moment, water consumption is so low that it may have consequences for hygiene. Therefore attention is being paid to rinsing water and setting up hygiene rules.

One trend in the health sector in particular is separating clothing in different colours. The trend leads to more diversified laundry, which affects the ability of the laundries to wash garments effectively. For example, red clothing can only be washed with other red garments, or clothes in similar colours. One advantage of coloured workwear versus white workwear is that the fabric does not have to be bleached with strong chemicals. Mat laundries also cite an increase in special requirements from customers. This concerns time between collections, colours, size and design of the mats such as children's mats with stimulating designs and mats with positive messages.

4 Other labels

This chapter provides an overview of other ecolabels and systems that are relevant to textile services.

Ecolabelling type 1

There is no other type 1 ecolabelling for textile services besides the Nordic Swan Ecolabel.

Purchasing requirements (GPP)

There are no EU GPP criteria for textile services. However, the Swedish National Agency for Public Procurement³ has criteria for textile services which are partly harmonised with the Nordic Swan Ecolabel's requirements.

³ <http://www.upphandlingsmyndigheten.se/>

Environmental management

Environmental management systems bring order to a company's operations and produce improvements based on the company's own targets in the environmental field. However, environmental management systems do not contain specific requirement levels (threshold values) for the product/service. The most important systems are EMAS, which was developed by the EU, and ISO 14001, which is an international standard.

A number of laundries are EMAS or ISO 14001 certified and also comply with industry association requirements, e.g. on quality, the environment and health and safety. The Nordic Swan Ecolabel sets concrete and tough requirements on environmental impact, which the management systems do not do. However, businesses that work with management systems often find it easier to collect and document the necessary information for Nordic Ecolabelling.

Industry organisations and quality labels

ETSA (European Textile Services Association)⁴ is the European industry association for textile services.

BVT (Brancheforeningen for vask og tekstiludlejning)⁵ is the Danish industry association for textile services/laundries. BVT has its own approval scheme which also covers quality.

The Finnish industry association for textile services is Tekstiilihuoltoliitto ry⁶ and it does not have a quality label.

There are two industry associations for textile services and dry cleaning in Iceland: Félag efnalauga og þvottahúsa and Félag efnalaugaeigenda.

NRV (Norsk Renseri- og Vaskeriforening)⁷ is the Norwegian industry association for textile services and dry cleaning. There is also NVK (Norske Vaskerier Kvalitetestilsyn)⁸, an organisation that carries out quality control.

Sveriges Tvätteriförbund⁹ is the industry association for the Swedish laundry industry and represents members in dry cleaning and textile services. Sveriges Tvätteriförbund has developed the "T-märket" quality label that may be used by its members.

5 About the criteria revision

This chapter sets out the purpose of the revision and describes the implementation of the project.

Purpose of the revision

⁴ <http://www.textile-services.eu/>

⁵ <http://danskevaskerier.di.dk/>

⁶ <http://www.tekstiilihuolto.fi/>

⁷ <https://www.norskindustri.no/>

⁸ <http://vaskeritilsynet.no/>

⁹ <http://www.tvatteriforbundet.se/>

The criteria for Nordic Swan Ecolabelling of textile services were evaluated in 2016. This revision draws on the conclusions reached during that evaluation. The main aim and sub-objectives of the revision are presented below.

Main aim

The main aim of the revision is to:

- Achieve additional environmental benefits
- Ensure trustworthy criteria adapted to the environmental performance of today and the future
- The Nordic Swan Ecolabel must be seen as a driving force urging sustainable development in the textile services industry
- The Nordic Swan Ecolabel is to continue to have an impact in the market
- Safeguard even more resource-efficient processing and requirements that are simple for the applicant (without being unambitious)

Sub-objectives

The main aim is to be attained through:

Area 1: Product group set-up

- The opportunity for Nordic Swan Ecolabelling has only been evaluated for certain categories of textiles, e.g. hotels and hospitals.
- The criteria take into account the growing B2C market.
- Existing textile categories have been expanded with the addition of sub-categories, particularly the Hotels category. The requirements that need specific requirement levels for these categories have been identified and the requirement levels have been expanded.

Area 2: Energy and climate requirements

- Updated energy and climate requirements have been drawn up. The requirement levels are based on information from existing licensees and non-Nordic Swan Ecolabelled laundries.

Area 3: Chemicals requirements

- The requirements on chemicals have been updated and tightened up.

Area 4: New requirements

- New requirements (point score requirements in some cases) that encourage recovery/re-use have been developed for use as a basis before consultation with a subsequent evaluation of whether or not they should be implemented in the criteria. In developing the requirement, there was a focus on making it as “fair” as possible for all laundries, irrespective of their customer base and mix of textile categories, partly via dialogue with existing licensees.
- Existing disposal requirements are adapted to the sorting carried out by the laundry, not our textile categories, to make it easier for the applicant.
- New requirements (point score requirements in some cases) on emissions of microplastics have been developed for use as a basis before consultation

with a subsequent evaluation of whether or not they should be implemented in the criteria.

- New requirements on terms of employment which draw on the requirements for cleaning services have been developed for use as a basis before consultation with a subsequent evaluation of whether or not they should be implemented in the criteria.

Area 5: Textiles and mats

- New requirements for mat laundries have been developed for use as a basis before consultation with a subsequent evaluation of whether or not they should be implemented in the criteria.
- Existing requirements on purchasing textiles have been tightened up in terms of purchasing ecolabelled textiles and the documentation requirements have been simplified to make processing quicker. This tightening of the requirement has been weighed against the existing provision.

Area 6: Other

- The point score requirement has been adapted in relation to environmental benefit.
- Existing interpretations have been implemented in the criteria.
- It is ensured that the requirements do not conflict with public procurement legislation.
- The quality requirement has been evaluated regarding the Swedish laundry association's change in quality control. Where necessary a new requirement has been developed.
- Requirements on external transport and drivers are in line with requirements governing own transport.

About this revision

The revision began with an internal workshop in February 2017. Following consultation, the revision concluded with the publication of new criteria in March 2018. Karen Dahl Jensen holds the position of Nordic product development manager and commissioned the revision. A list of the project participants is provided below.

Project group

Caroline Karlsson, Nordic project manager

Arne Godal, project advisor

Jeppe Frydendal, internal expert textile services

Internal reference

Arne Godal, product specialist Norway

Jeppe Frydendal, product specialist Denmark

Maria Tengqvist, product specialist Sweden

Harri Hotulainen, product specialist Finland

Rebecca Ugglå, energy expert

Therese Rydén, communications officer

External support

Contact with external stakeholders was identified as an important parameter for the success of the project at an early stage. The external support process partly seeks to find out the prevailing attitude to the criteria and partly to make the industry aware that the criteria are being revised. It is also an opportunity for the project group to gather valuable information on the industry for the revision. The project group has held physical meetings and phone calls and been in e-mail contact with licensees, chemicals producers, suppliers of technical equipment and other stakeholders. In addition, a number of non-Nordic Swan Ecolabelled laundries have contributed data during the revision. Nordic Ecolabelling would like to thank all external stakeholders that contributed to the process.

6 Environmental impact of textile services

This chapter describes the areas that are significant for textile services from a life cycle perspective, in terms of the environment and health. The chapter also sets out a calculation of the carbon footprint for three key services in textile services, based on the principles of the Greenhouse Gas Protocol methodology. The calculation provides a good overview of where in the life cycle carbon emissions occur and their magnitude.

Textile services from a life cycle perspective

The actual washing/drying process at the laundry has a major impact on the life cycle of textiles. This is natural since from a life cycle perspective the textiles are “only” produced and disposed of once, while they are washed and dried a large number of times, making these processes of great importance.

By examining the product group from a life cycle perspective, Nordic Ecolabelling has judged that it is relevant to set requirements that affect every aspect of the life cycle:

- The laundry’s energy consumption and climate impact
- Chemicals consumption at the laundry
- The laundry’s water consumption
- Purchasing textiles and mats with relevant requirements backwards in the chain
- Distribution
- Waste – including with a focus on disposal of textiles

Data gathered from licensees and non-Nordic Swan Ecolabelled laundries, and various industry data show that there is a major difference in energy and water consumption in the production processes of different laundries. There is also a difference in the laundry chemicals used and their environmental impact. By optimising and regulating the laundry temperature, machines with low consumption and choice of fuel in production, laundries themselves have steerability of energy and water consumption. Also laundry chemicals are developed in close dialogue between chemicals producers and laundries, which means that the laundries also have steerability regarding the chemicals that are

used. It is well known that there is worse and better textile manufacturing, which is reflected in different ecolabels for textiles. As it is the laundry that buys in and owns the majority of the textiles and mats handled at the laundry and used by customers, steerability is high. There are also differences in terms of environmental performance when it comes to transport to and from customers. Transport is steerable and very visible to the laundry's customers. Investigations of what happens to discarded textiles show that there are differences regarding whether they are reused, sent for material recovery or sent for incineration or landfill. The laundries have steerability over what happens to textiles at the disposal stage.

Figure 1 Life cycle of textile services



Carbon footprint of textile services

It is the European Textile Services Association, ETSA, and its members that charged EcoForum in Denmark with calculating the carbon footprint of three key textile services (Grüttner, 2015):

1. Providing a worker with workwear for one year
2. Providing a hotel bed with bed linen for one year
3. Providing an entrance door in northern Europe with mats for one year

The data collection and the calculation were carried out in line with the principles of the WBCSD/WRI Greenhouse Gas Protocol¹⁰ methodology, which has several similarities with a life cycle analysis in line with the ISO LCA standards 14040 and 14044. The GHG Protocol classifies greenhouse gas emissions based on three “scopes”:

Scope 1: Direct emissions from owned or controlled sources.

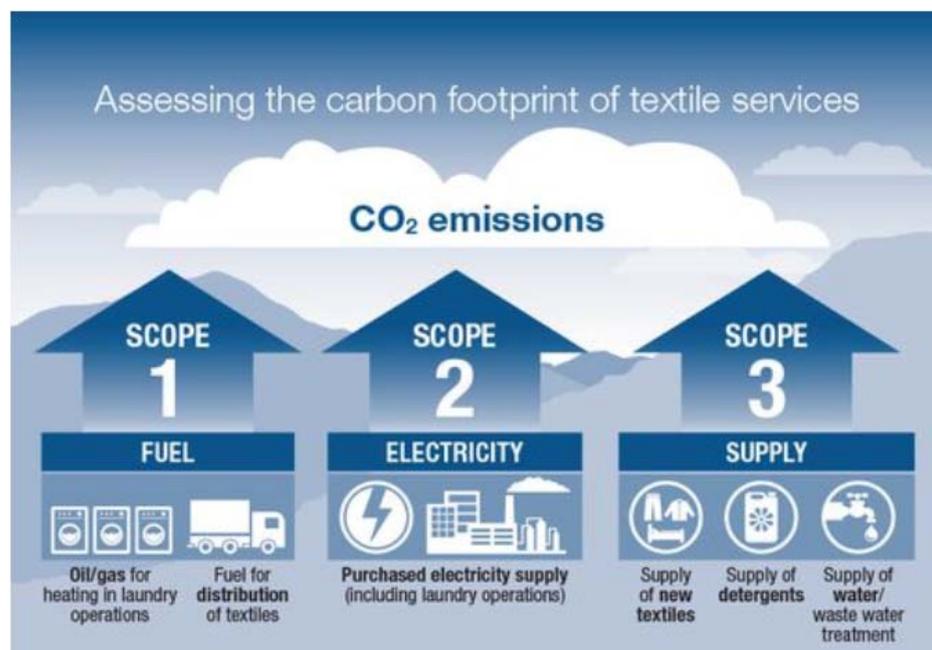
Scope 2: Indirect emissions from production of purchased energy.

Scope 3: All indirect emissions that are not included in scope 2 and which arise in the reported company's value chain, both upstream and downstream.

¹⁰ <http://www.ghgprotocol.org/>

The figure below shows emissions of greenhouse gases for textile services. Scope 1 involves use of fuel for heating and transporter/distribution, scope 2 electricity consumption and scope 3 delivery of new textiles, laundry chemicals and water, and internal water treatment where used.

Figure 2 The figure shows emissions of greenhouse gases (mainly CO₂) for textile services (ETSA, 2017)



The calculation includes all energy use in textile services; laundry and transport of clean/dirty textiles, delivery of laundry chemicals, new textiles and water, and internal water treatment where used. Due to a lack of reliable data, the calculation does not include the disposal of textiles at the end of their life. The table below provides a more detailed picture of the parts of the life cycle covered by the calculation.

Table 1 Overview of the parts of the life cycle included in the calculation (Grüttner, 2015)

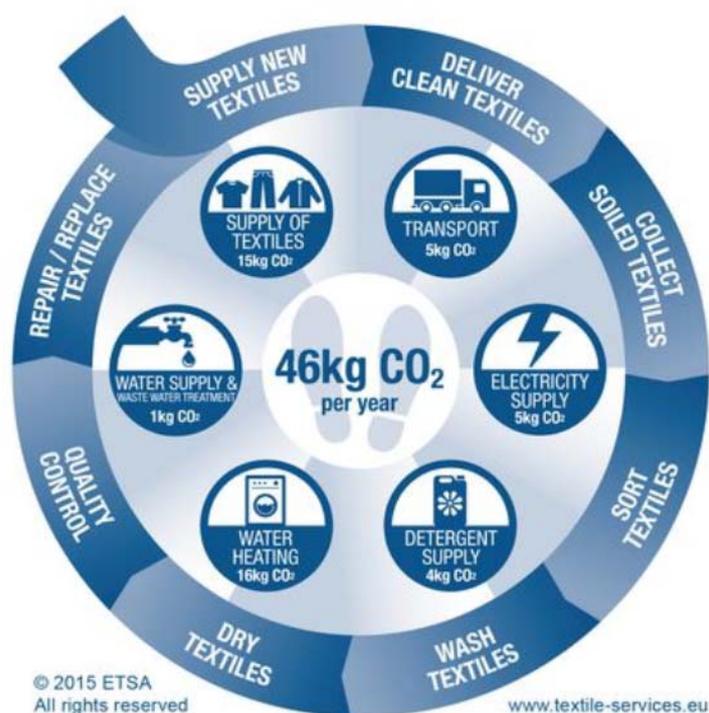
	Raw-material stage	Manufacturing stage	Use stage	Disposal stage
Textiles	Growing of cotton Extraction of crude oil and refining into polyester	Spinning Weaving Wet treatment Cutting and stitching	Use in textile services	<i>Not considered</i>
Detergents	Extraction of the relevant raw-materials	Manufacturing the industrial detergents	Consumptions in textile services	Discharge to municipal wastewater treatment plants – together with the soiling
Water	Extraction	Pre-treatment typically 'softening' by ionic exchange	Consumptions in textile services	
Electricity	Extraction of oil, gas, etc.	Manufacturing and distribution of the electricity	Consumptions in textile services	(Energy lost as heat)
Fuels like Oil/gas/diesel	Extraction of oil, gas, etc.	Refining Distribution	Consumptions in textile services	(Energy lost as heat)

Workwear

In many industries, employers provide their employees with workwear. The employer normally hires the workwear from a textile services company and employees can expect clean clothes delivered to the workplace while dirty clothes are taken back for laundry. Providing a worker with workwear for one year involves a total carbon footprint of 46 kg carbon dioxide, see figure 3.

On average workwear will undergo 47 laundry cycles before being removed from production. In comparison, the environmental impact (CO₂ emissions) of delivering new workwear is 22 times higher than washing it once.

Figure 3 The carbon footprint of equipping a worker with workwear for a year (ETSA, 2017)

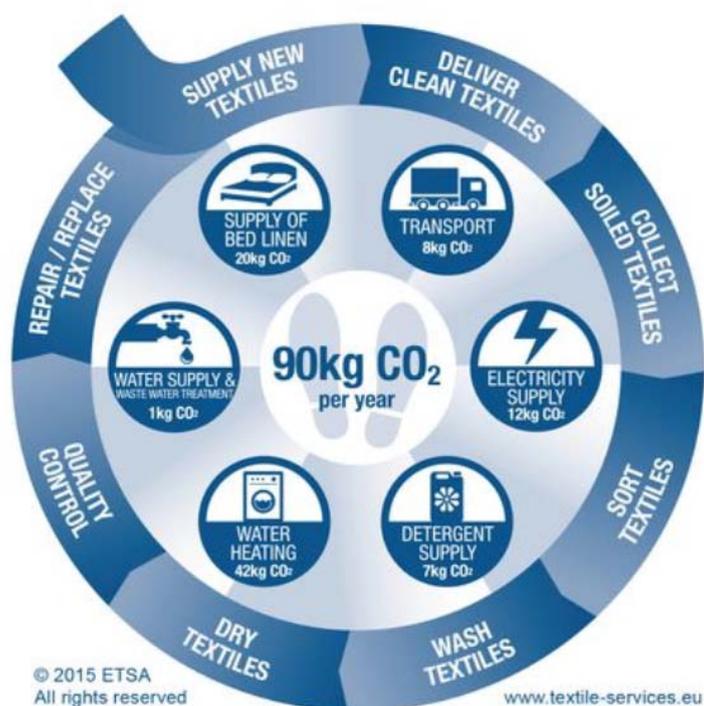


Bed linen

Bed linen and towels are changed 200 times per room per year at a hotel on average. Usually a textile service company is responsible for laundering and maintaining this service. Providing a hotel bed with bed linen for one year involves a total carbon footprint of 90 kg carbon dioxide, see figure 4.

On average bed linen will undergo 119 laundry cycles before it needs to be replaced. In comparison, the environmental impact (CO₂ emissions) of delivering new workwear is 33 times higher than washing them once.

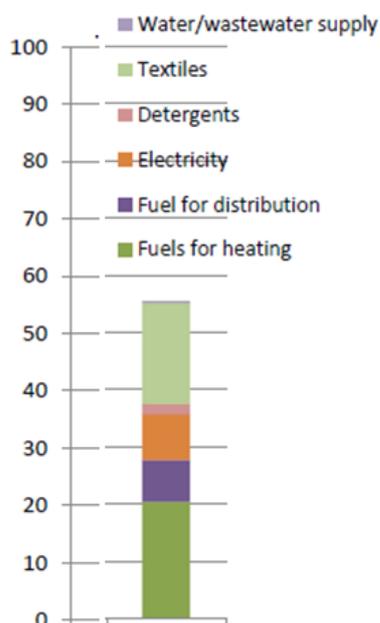
Figure 4 Carbon footprint for providing a hotel bed with bed linen for one year (ETSA, 2017)



Mats

There is often a mat at entrance doors to public buildings, offices, schools and similar to absorb dirt and water. These mats are replaced 50 times a year on average. Providing an entrance door in northern Europe with mats for one year involves a total carbon footprint of 56 kg carbon dioxide, see the diagram below.

Figure 5 Carbon footprint in kg CO₂ for providing an entrance door in northern Europe with mats for one year (Grüttner and Lilholt Sørensen, 2016)



The report provides interesting figures on how many times the different types of textile are washed during their lifetime and the reduction in climate gas emissions when the textiles are washed several times. However, because it is unclear how the amounts of CO₂ emissions are calculated, especially for the electricity consumed, it is difficult to compare the figures with values for other laundries.

7 Justification of the requirements

This chapter presents proposals for new and revised requirements, and explains the background to the requirements, the chosen requirement levels and any changes compared with generation 3. The appendices referred to are those that appear in the criteria document “Nordic Swan Ecolabelling of Textile Services”.

7.1 Definition of the product group

The product group includes the entire textile service. A chain/group with several units can apply for a licence for one or more units. Each unit must fulfil the requirements and have its own licence. If all the units in a chain/group in a country are Nordic Swan Ecolabelled, they can market themselves as a Nordic Swan Ecolabelled chain/group in that country.

For cloth hand towel rolls, either the whole laundry can be Nordic Swan Ecolabelled or only the part of the laundry that handles cloth hand towel rolls.

The criteria do not apply to companies that only offer dry cleaning. The criteria for alternative dry cleaning are available for these companies.

Laundry of cloth hand towel rolls originally had its own criteria document. When this was merged with the criteria for textile services, it became permitted to Nordic Swan Ecolabel only the part of the laundry that handles cloth hand towel

rolls. Apart from this exception, the Nordic Swan Ecolabel covers the whole laundry. Thus it is not permitted to only Nordic Swan Ecolabel particular textile categories at the laundry.

The product group definition is the same as in generation 3 of the criteria.

7.2 Description of the service.

This section contains requirements that aim to describe the service and the distribution of laundry between different categories of textiles. The distribution of laundry is used as a basis for the requirements on consumption of energy, water and laundry chemicals.

O1 Description of the service.

The applicant must describe the service that is to be Nordic Swan Ecolabelled in line with Appendix 1. Any contractors, Nordic Swan Ecolabelled and non-Nordic Swan Ecolabelled, used for laundry and dry cleaning must also be stated here.

Description of the service in line with Appendix 1.

Background to requirement O1

The purpose of the requirement is to give an overall picture of the laundry that is to be Nordic Swan Ecolabelled, so that licence administration is correct and effective.

From generation 3 to generation 4 of the criteria: No change, only updated.

O2 Distribution of laundry between different textile categories

The laundry must account for incoming laundry in kg on an annual basis in the different textile categories in Table 2. See Appendix 2 for a description of the textile categories.

The distribution of laundry between different textile categories is used as a basis for the requirement on use of energy, water and laundry chemicals. Only laundry delivered to the laundry should be counted, not relaundering. The number of kg must be based on weighing before laundering.

Table 2 Textile categories

Textile categories	Sub-categories	Kg
1) Workwear for industrial/kitchen/butchering and equivalent use Kitchen textiles (cloths and towels)	White workwear, e.g. from the food industry, etc.	
	Kitchen textiles and towels	
	Coloured workwear and other textiles	
	Textiles for clean rooms	
2) Workwear for institutions/retail/service Shoes	White	
	Other	
3) Hotels	Hotel linen	
	Linen for holiday cottage accommodation	

4) Restaurants	White cloths	
	White napkins	
	Coloured cloths and other textiles	
5) Hospitals/nursing homes	Blood-stained textiles	
	Other textiles	
6) Duvets and pillows		
7) Mops and offshore mats		
8) Other mats		
9) Cloth hand towel rolls		
10) Industrial cloths		
11) Dry cleaning		
12) Private clothes from households/institutions	White	
	Other	
13) Other		
TOTAL		

- Distribution of incoming laundry in kg on an annual basis between the textile categories in Table 2.
- Data to substantiate the above distribution.

Background to requirement O2

The distribution of laundry between different textile categories is used as a basis for the requirement on use of energy, water and laundry chemicals. Only the number of kg of laundry delivered to the laundry should be counted, not relaundering. The number of kg must be based on weighing on arrival.

Laundries with customers in Swedish, Norwegian and Finnish fell tourism areas have a category for holiday cottage laundry. These areas receive many tourists in the summer and the winter who stay almost exclusively in holiday cottages for periods of one to two weeks. This results in bed linen and towels becoming dirtier than traditional hotel linen and towels, that are usually only used for one night or a weekend. As a consequence, holiday cottage linen requires a tougher laundry programme to clean, with higher energy consumption as a result. Linen for holiday cottage accommodation can account for up to 50% of the laundries' total amount of laundry in summer and winter. The textile category Hotels (3) has therefore been divided into two sub-categories, one for traditional hotel linen and one for linen for holiday cottage accommodation. The latter category has somewhat more generous factor values for energy, greenhouse gases, CDV and chlorine.

The textile category Workwear for industrial/kitchen/butchering and equivalent use (1) has been expanded with the addition of a new sub-category: Textiles for clean rooms. Clean rooms are found in industries including the following: Pharmaceuticals, medical equipment, biotechnology, microelectronics and optics. The normally foremost source of pollution in a clean room is people and therefore extremely high requirements are placed on the garments used by operators in a clean room (Berendsen, 2017). This includes high requirements of the laundry process, including thermal disinfection. All workwear worn in clean rooms must be placed in category 1, although it actually belongs to the textile category Workwear for institutions/retail/service (2).

O3 Non Nordic Swan Ecolabelled contractors

The proportion of laundry carried out by contractors who are not Nordic Swan Ecolabelled must not exceed 1.0% by weight.

All non-Nordic Swan Ecolabelled contractors must document compliance with requirement O16 for all chemicals used in laundry for the Nordic Swan Ecolabelled customer (laundry).

- ☒ Documentation of the proportion of textiles (% by weight) laundered by non-Nordic Swan Ecolabelled contractors on an annual basis.
- ☒ List of laundry chemicals used by non-Nordic Swan Ecolabelled contractors. If these laundry chemicals are Nordic Swan Ecolabelled or already familiar to Nordic Ecolabelling and permitted for use in Nordic Swan Ecolabelled laundries, no further documentation is required. If this is not the case, documentation is needed under requirement O16.

Background to requirement O3

Here Nordic Ecolabelling sets requirements on chemicals for contractors who deal with less than 1% of the textiles. This might immediately appear to involve a very small environmental impact, but on the other hand, laundry by contractors for an individual customer at the Nordic Swan Ecolabelled laundry accounts for 100% for the customer (even if it is less than 1% for the laundry). This customer has an expectation that requirements will be set regarding constituent substances. At the same time, it is possible to simply and clearly communicate the substances that are avoided by choosing Nordic Swan Ecolabelled textile services.

The requirement is unchanged compared with generation 3 of the criteria.

O4 Dry cleaning

All chemicals used for dry cleaning must meet requirement O16 on constituent substances.

The amount and type of chemicals bought in for dry cleaning, and the amount of used chemicals delivered to approved recipients must be documented by confirmation from the chemicals supplier and the waste recipient.

For laundries where cleaning amounts to more than 1.0% by weight and less than 5.0% by weight of the amount of textiles (both internally and externally at potential contractors) no halogenated cleaning fluids (such as perchloroethylene) may be used.

For laundries with a proportion equal to or more than 5.0% by weight of the amount of textiles, only cleaning that complies with Nordic Ecolabelling's requirements for alternative textile cleaning may be used.

- ☒ Documentation under requirement O16 and safety data sheet for product in line with applicable European legislation (Annex II to REACH, Regulation 1907/2006/EC).
- ☒ The amount and type of chemicals bought in for dry cleaning, and the amount of used chemicals delivered to approved recipients must be documented by confirmation from the chemicals supplier and the waste recipient.

- ☒ The number of kg of textiles cleaned, internally in laundries and externally by contractors must be documented. For external cleaning, state the supplier and cleaning technology. Contractors must complete Appendix 3 or state the licence number. Additional documentation for cleaning is not necessary when using a Nordic Swan Ecolabelled dry cleaner.

P1 Dry cleaning

The following points are allocated to laundries that have less than 5.0% by weight of dry cleaning and use a Nordic Swan Ecolabelled alternative dry cleaner.

- 1 point if > 70% of the dry cleaned goods are treated by a Nordic Swan Ecolabelled alternative dry cleaner.
- 2 points if all of the dry cleaned goods are treated by a Nordic Swan Ecolabelled alternative dry cleaner.

- ☒ The sub-contractor's licence number and annual reporting in terms of the amount of dry cleaning (% by weight).

Background to requirements O4 and P1

The number of dry cleaners in the Nordic countries is gradually shrinking. In 2016 there were approximately 600 dry cleaners in all of the Nordic countries. People are increasingly wearing fewer clothes that need to be dry cleaned. Dress codes are changing and becoming less formal, both at work and outside work. Talking to several laundries confirms this picture – the volume of dry cleaned textiles is decreasing. However, there are textiles that cannot withstand washing with water and require dry cleaning. This tends to concern a small proportion of textiles and Nordic Ecolabelling sets limited requirements on the laundry process for this reason. All chemicals used for dry cleaning must comply with requirement O16 on constituent substances.

When calculating the percentage of laundry, the amount of textiles cleaned for other Nordic Swan Ecolabelled laundries can be excluded as this amount is included in the other laundry's calculation of the percentage of laundry and this avoids counting the same amount twice. Laundries that use Nordic Ecolabelled contractors have a further opportunity to gain points for this.

The requirement is unchanged compared with generation 3 of the criteria.

7.3 Energy, greenhouse gases and water

The requirements addressing energy, greenhouse gases and water are divided into seven requirements, five of which are compulsory and three of which are point score requirements. It is possible to accrue a total of 25 points on the requirements on energy, greenhouse gases and water.

O5 Sulphur content of fuel

Sulphur content of the fuel used by the laundry shall not exceed 0.05% sulphur by weight.

No documentation is required for natural gas, LPG, solid biofuel or other sources of energy for which it is generally accepted that the sulphur content will never exceed the threshold value.

- ☒ Documentation from the fuel supplier on the sulphur content of fuel.

Background to requirement O5

Besides climate effects, energy consumption also contributes other environmental effects such as acidification and nutrient loading. Reduced energy consumption thus has many positive environmental effects. When it comes to acidification, the fuels that contain high amounts of sulphur have a higher impact than other types of fuel. For this reason, Nordic Ecolabelling sets an additional requirement on the sulphur content of the fuel used at the laundry of a maximum 0.05% (w/w). This means in practice that fuels such as coal, coke and heavy fuel oil are excluded.

The requirement has been tightened up compared with generation 3 of the criteria. The requirement is set to ensure that the laundries that use fuels that cause the most pollution are not Nordic Swan Ecolabelled.

O6 Energy

The amount of energy consumed (A_{energy}) at the laundry must be less than or equal to the threshold value of the laundry for energy (G_{energy}). The permitted energy use (F_{energy}) varies depending on the textile category, see Table 2. The laundry's G_{energy} and A_{energy} must be calculated on an annual basis.

If energy consumption for the following processes can be separated using metering equipment or relevant calculations, they can be excluded from the calculation of A_{energy} :

- Internal waste water treatment plant.
- 35% of energy consumption for VOC afterburners for laundries that launder industrial cloths.
- Internal dry cleaning of textiles.

Table 3 Factor values for energy consumption for different textile categories

Textile categories	Sub-categories	F_{energy} [kwh/kg*]
1) Workwear for industrial/kitchen/butchery and equivalent use Kitchen textiles (cloths and towels)	White workwear, e.g. from the food industry, etc.	2.50
	Kitchen textiles and towels	
	Coloured workwear and other textiles	
	Textiles for clean rooms	
2) Workwear for institutions/retail/service Shoes	White	2.00
	Other	
3) Hotels	Hotel linen	1.40
	Linen for holiday cottage accommodation	1.70
4) Restaurants	White cloths	2.30
	White napkins	
	Coloured cloths and other textiles	
5) Hospitals/nursing homes	Blood-stained textiles	2.20
	Other textiles	
6) Duvets and pillows		2.55

7) Mops and offshore mats		0.75
8) Other mats		0.65
9) Cloth hand towel rolls		1.55
10) Industrial cloths		3.10
11) Dry cleaning		-
12) Private clothes from households/institutions	White	2.90
	Other	
13) Other		0.65

* No. kg textiles in each textile category is based on data given in requirement O2.

Calculation of G_{energy} and A_{energy} :

$$G_{energy} = \sum [(Proportion)_i \cdot (F_{energy})_i]$$

$$A_{energy} = 1.6 \cdot A_{el} + A_{fuel}$$

G_{energy} = Threshold value for total energy in kWh/kg of laundry at the laundry

A_{energy} = Energy used in kWh/kg of laundry at the laundry

$(F_{energy})_i$ = Factor value for energy consumption in kWh/kg per textile category.

A_{fuel} = Fuel used in kWh/kg of laundry at the laundry

A_{el} = Electricity used in kWh/kg of laundry at the laundry

$(Proportion)_i$ = Proportion of a textile category i, which is attained when the annual quantity of laundry in the category is divided by the total annual amount of laundry.

Calculation that shows that A_{energy} is less than or equal to G_{energy} .

Data to substantiate the calculation.

P2 Energy

Points are awarded to laundries with a lower energy consumption than the levels specified in Table 4.

Table 4 Points for low energy consumption

Percentage A_{energy} of G_{energy}	Points
A_{energy} less than 50% of G_{energy}	10
A_{energy} less than 60% of G_{energy}	8
A_{energy} less than 70% of G_{energy}	6
A_{energy} less than 80% of G_{energy}	4
A_{energy} less than 90% of G_{energy}	2
A_{energy} less than 95% of G_{energy}	1

Calculation showing the number of points scored in relation to Table 4.

Background to requirements O6 and P2

The background to requirements O6 and P2 is set out below.

Laundries' energy consumption

Laundries use both electricity and heating (different fuels and to a certain extent district heating). The main fuel source in Nordic Swan Ecolabelled laundries is usually natural gas, LPG, pellets or bio-oil. However, electricity is required to operate pumps, tumble dryers and for other mechanical work. Electricity can also be used to make steam.

Under generation 3 of the criteria, several laundries introduced energy efficiency improvements (including replacing old washing machines and central boilers) to reduce their energy consumption and meet the Nordic Swan Ecolabel's energy requirements. In addition, several laundries in Sweden have switched from fuel oil as a fuel source to bio-oil or pellets to meet the greenhouse gas requirement. By replacing fuel oil with bio-oil, a medium-sized laundry in the Nordic countries has cut its carbon emissions by 330 tonnes a year. Similarly, many laundries in Norway have switched from oil to gas. In Finland, one laundry has switched fuel to biogas and so cut its carbon emissions by 90%.

See the section on Development of the market in Chapter 2 for a description of trends and tendencies regarding energy and climate.

RPS

Several life cycle analyses show that energy consumption in the user phase (i.e. for activities that the laundry can directly influence) is high compared with other parts of the life cycle (Erberle & Möller, 2006; Frederiksen, 2004; Hansen & Holst, 2002; Frydendal, 2001; Schmidt, 2000; Frydendal, 1998; Kalliala, 1997). Schmidt (2000), which analyses cloth hand towel rolls from a life cycle perspective, divides the energy consumption into three phases as follows (Frydendal; Schmidt & Zeuthen, 2000):

- Manufacture ~ 16%
- Usage (washing/drying/disposal) ~ 80%
- Distribution ~ 5%

Although the references are not based on updated data, it is likely that energy consumption in the usage phase remains the most important. Thus the requirement regarding energy consumption in the usage phase is very relevant and very steerable. The potential in setting energy requirements is also high, in that there are major differences in how much energy the individual laundries consume – also when washing the same type of textiles. This is shown by our data collection for Nordic laundries (both Nordic Swan Ecolabelled and non-Nordic Swan Ecolabelled) that we have carried out as part of this revision. Nordic Ecolabelling has therefore focussed on reducing energy consumption in the user phase also in this revision. The focus is not only on reducing the amount of kWh used in the laundry; energy factors are used such that the “primary energy” is also included in the calculation of the energy requirement and not just in the CO₂ requirement.

Electricity and fuel

To ensure that Nordic Swan Ecolabelled laundries have high energy efficiency, the total energy consumption of the laundry, of both electricity and fuel, is examined, seen in relation to how much and which textile categories are washed. Severely soiled laundry often requires higher temperatures and thus more energy.

Not all forms of energy are equally applicable. The term exergy is used to describe the energy quality of an amount of energy. Energy in the form of electricity is pure exergy, for example. It can be converted into mechanical energy, chemical energy, heat energy, etc. Heat energy that is spread in a room, on the other hand, has low exergy because it is harder to use for other purposes (IVA, 2012). In other words, electricity has a higher energy quality than fuel. 1 kWh of electricity can always be converted into 1 kWh of heat but not vice versa.

Electricity is produced in many different ways and the trend is for the proportion of renewable electricity in the electricity grid to increase, but fossil-produced electricity, and hydropower, continue to play a central role as regulatable energy at a European level. Regulatable energy refers to the electricity production that is stepped up or reduced depending on demand at the time. On an annual basis, however, hydropower production will not be affected by a change in demand, as the aim is always to exploit the full capacity. Thus the consequence of changed consumption in the long run will typically be a change in production of the regulatable power capacity in general – in other words typically fossil based.

There are major differences in the electricity mix of the different countries, but the electricity grid in the Nordic countries (apart from Iceland) is connected and electricity is exchanged across the market irrespective of national borders (Nord Pool, 2017). There are 12 price zones for electricity in the Nordic countries (2 in Denmark, 1 in Finland, 4 in Sweden and 5 in Norway). In Norway there is a lack of transfer capacity between different regions and power can be transported from north to south Norway and vice versa via Sweden. There is also a lack of transfer capacity between the countries and towards Europe, which means that energy can become “locked in” despite demand and a willingness to pay. In 2014 approximately 20 TWh of electricity were exported from the Nordic countries and less than 10 TWh were imported of a total approximately 380 TWh produced in the Nordic countries. The exchange capacity between the zones will increase in the future (Nordic Energy Technology Perspective, 2016).

The energy requirement sums up the amount of energy and fuel used. It takes more than 1 kWh of energy to obtain 1 kWh of electricity. When the electricity is manufactured, there is a loss, partly in production, partly via transport from production to the user of the electricity. To make the figures for electricity and fuel comparable with each other, an energy factor for electricity is therefore used.

In the previous generation of the criteria, electricity consumption was recalculated to fuel energy on the basis of what was then the standard coefficient for electricity in the EU, of 2.5. This reflects the fact that due to a loss of energy in production and distribution of electricity, there was an assumed average efficiency of 40% (EU 2006) – or in popular terms, that electricity producers had to use 2.5 kWh of fuel per kWh of electricity delivered.

In 2016, a project conducted for the European Commission concluded that the factor 2.5 is no longer up to date and should be reviewed (Esser & Senfuss, 2016). They carried out calculations using a number of different methods and assumptions and reached the conclusion that the factor – depending on method – for the expected situation in 2020 should instead be between 1.59 and 2.09 (Esser & Senfuss, 2016). Due to the complexity of the calculations, none of the selected calculation methods take into account the marginal electricity production – in other words the production that is actually affected by a change in demand (e.g. an electricity saving). It is important to bear this in mind when interpreting the report as the factor for the margin must generally be assumed to be higher than the average.

Another complicating factor is that the electricity margin can change over time. Where the norm is fossil-based, under certain circumstances and for periods it may be renewable, if there is a greater production of renewable electricity than there are recipients (critical electricity surplus).

The situation is extremely complex and it is not possible for Nordic Ecolabelling to choose a factor that is correct in all cases; whatever the factor we choose, some people will criticise us for it being too high and others for it being too low. Nordic Ecolabelling has therefore had to make a choice that may be unpopular but that we think will ensure that we are going in the right direction in terms of ensuring that Nordic Swan Ecolabelled laundries are energy-efficient.

The criteria for textile services in principle cover the whole world, and all laundries can apply for a Nordic Swan Ecolabel licence – wherever in the world the laundry is located. But Nordic Ecolabelling is based in the Nordic countries and at the moment all Nordic Swan Ecolabelled laundries are in the countries that are covered by the Nordic electricity market. In 2009 the estimated average energy factor in the Nordic countries was 1.74 kWh/kWh_{el} (Gode et al., 2011) and average emissions of climate gases in 2005-2009 were 125.5 g CO₂eq/kWh_{el} (Swedish Energy Agency, 2017). As the energy factor is an expression of primary energy – in other words, including, for example, the energy from extracting and transporting fuel to the power station, the equivalent factor for fuel energy will be slightly lower. At the same time, the trend and the political aims are moving towards a larger and larger proportion of renewable electricity production, which will mean that both factors will gradually be improved for the average Nordic electricity market in the future.

To take into account the above expected improvements during the course of the validity of the criteria, Nordic Ecolabelling is adjusting the above factor for electricity downwards to:

- 1.6 kWh/ kWh_{el}
- 115 g CO₂/kWh_{el}

Nordisk Ecolabelling is aware that it is not actually 100% correct to use these values and that Nordic Swan Ecolabelled laundries may be located outside this electricity market.

Self-generated renewable energy

Some laundries have invested in solar panels and similar to produce some of the electricity they use themselves. Nordic Ecolabelling wishes to welcome these

kinds of initiatives – also even if it is not entirely clear how high an environmental effect this kind of initiative actually has in reality. For example, it would be far too imprecise to say that the self-generated energy is produced without any environmental impact. For example, there is not always a connection between when the solar panels produce electricity and when the laundry needs electricity. Surplus electricity is delivered out on the market and makes a positive contribution to the average for the electricity grid. On the other hand, a total greater environmental benefit is likely to be able to be attained for the same amount of money by investing the money in larger, central plants. At the same time, Nordic Ecolabelling would like the laundries to continue to focus on being energy efficient. In order to one the one hand applaud investments in self-generated electricity and on the other safeguard energy efficiency, Nordic Ecolabelling has decided that the CO₂ factor for self-generated renewable electricity can be halved in this generation of the criteria.

District heating

A small proportion of the laundries use district heating. The real environmental impact of district heating is determined by the local district heating network to which the laundry is connected. Where this involves heating from pure heating plants, with energy losses, this will result in a factor that is above 1.0. If, on the other hand, the plant involves CHP, the extra fuel needed to deliver 1 kWh of district heating will only be above 0.5 kWh, as this increases the total energy efficiency with simultaneous CHP production (Martinsson et al., 2012).

The fuels that are used in the district heating network also depend on the local/regional network. For CHP, using it in the process is a good approach in environmental terms, as there will thus also be a demand for heat during the summer when there are fewer people who need heating.

Energy and climate factors from the local district heating network can be used in the calculation – alternatively the following conservative factors can be used based on pure heating production with natural gas and a total beneficial effect of approximately 0.9.

Conservative district heating factors that can be used if specific data from the local district heating network is unavailable:

- 1.1 kWh/kWh_{district heating}
- 227 g CO₂/kWh_{el}

Exemptions from the requirement:

When washing severely soiled textiles, it is beneficial to treat the water while the concentration of dirt is high. In the light of this, energy consumption for internal waste water treatment plants can be exempted from the calculation of A_{energy}.

When washing industrial cloths, some laundries require that the air is sucked out of the whole laundry and incinerated in an afterburner to ensure that the VOCs that come in with the dirty cloths are not released into the environment. This is a high energy process but the waste heat from the process can be used to heat washing water and tumble dryers. To take this into account, we do allow laundries that wash industrial cloths and which are able to document the energy

consumption in the afterburner using special measuring equipment to deduct 35%¹¹ of the energy consumption in the afterburner.

Energy consumption at internal textile cleaning can be deducted as it is not included as part of the ecolabelled operation. This like chemicals used for cleaning, which for the same reasons are also not included in the calculation (compare the total CDV value of the laundry, the total amount of anNBO or total chlorine consumption).

Requirement levels

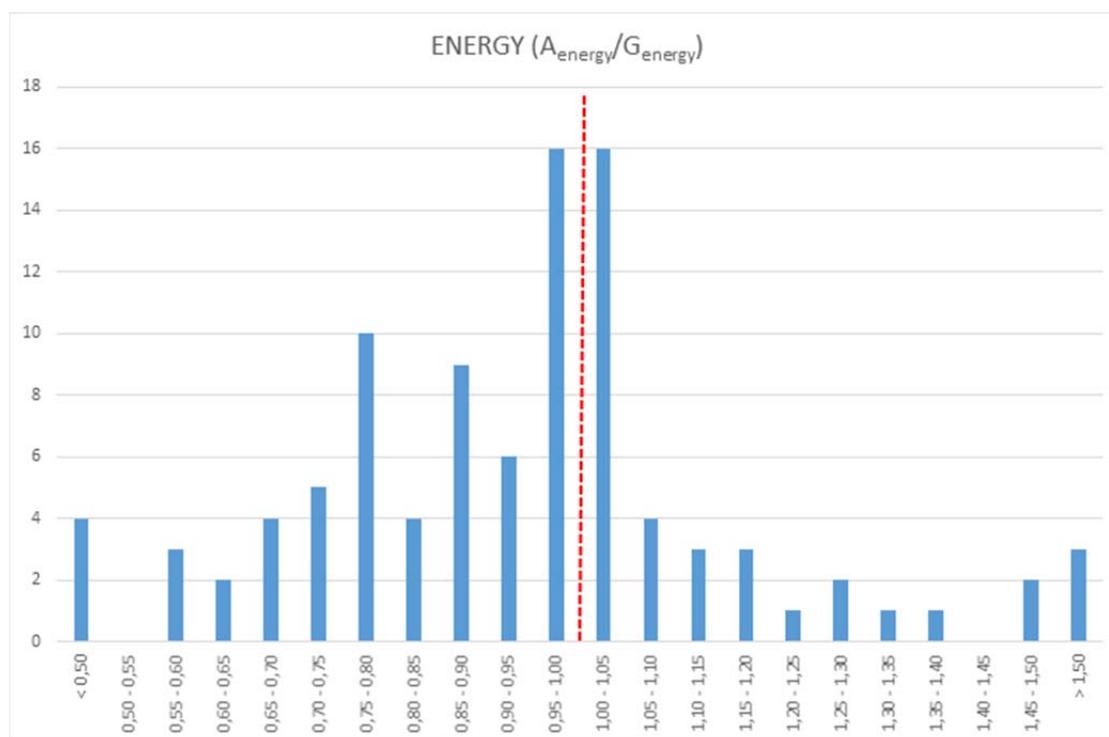
To set the requirement, Nordic Ecolabelling has gathered data from just under 100 laundries across the Nordic countries – both Nordic Swan Ecolabelled and non-Nordic Swan Ecolabelled. The majority of the data (70%), however comes from licensed laundries. It must be expected that the Nordic Swan Ecolabelled laundries generally perform better than the average, which is why an over-representation of data from Nordic Swan Ecolabelled laundries means that we cannot see our data as 100% representative. In other words, this means that our requirements have a tougher impact than might immediately appear when we look at our data.

For example, our analysis shows that 35% of the laundries have to improve their energy consumption if they are to meet the Nordic Swan Ecolabel's requirements. For non-Nordic Swan Ecolabelled laundries, a whole 75% have to reduce their energy consumption to meet the requirements.

Regarding climate gases, similarly 25% of the laundries have to improve – and there is naturally a clear link between laundries with a higher energy consumption and a high climate impact.

¹¹ The evaluation of generation 2 (Nordic Ecolabelling, 2011) concluded that there was a need to relax the energy requirement for laundries that wash industrial cloths due to their high need for energy for cleaning technologies, which can reduce the emissions of heavy metals, solvents, oils and other problematic substances from the laundered cloths. Instead of solely relaxing the actual threshold values, an opportunity is given to deduct a larger proportion of the energy that is used in VOC strippers. In this way it is only laundries that wash industrial cloths and are simultaneously making efforts to reduce the emission of such solvents into the atmosphere that are able to benefit from the relaxation of the requirements.

Figure 6 Relative deviation of Nordic laundries from the obligatory requirement level for energy consumption



See the table below for the difference in factor values between generation 3 and 4 of the criteria.

Table 5 Tightening up factor values for energy consumption in kWh/kg per textile category¹²

Textile categories	Sub-categories	F _{energy} [kwh/kg*] Generation 3	F _{energy} [kwh/kg*] Generation 4
1) Workwear for industrial/kitchen/butchering and equivalent use Kitchen textiles (cloths and towels)	White workwear, e.g. from the food industry, etc.	2.70	2.50
	Kitchen textiles and towels		
	Coloured workwear and other textiles		
	Textiles for clean rooms		
2) Workwear for institutions/retail/service Shoes	White	2.60	2.00
	Other		
3) Hotels	Hotel linen	1.65	1.40
	Linen for holiday cottage accommodation		1.70
4) Restaurants	White cloths	2.75	2.30
	White napkins		
	Coloured cloths and other textiles		
5) Hospitals/nursing homes	Blood-stained textiles	2.50	2.20
	Other textiles		
6) Duvets and pillows		3.00	2.55

¹² The new criteria are slightly less strict than they would immediately appear as the factor for electricity has been reduced from 2.5 to 1.6 in generation 4 of the criteria.

7) Mops and offshore mats		1.00	0.75
8) Other mats		0.90	0.65
9) Cloth hand towel rolls		1.80	1.55
10) Industrial cloths		3.10	3.10
11) Dry cleaning		-	-
12) Private clothes from households/institutions	White	3.20	2.90
	Other		
13) Other		0.90	0.65

* No. kg textiles in each textile category is based on data given in requirement O2.

The textile category Hotels (3) has been divided into two sub-categories, one for traditional hotel linen and one for linen for holiday cottage accommodation. The latter category has a more generous factor value for energy as the textiles are dirtier than traditional hotel bedding. They thus demand a tougher laundry programme – higher temperatures and a longer washing time to be clean. During the revision, a licensee that washes a large proportion of holiday cottage bed linen measured the energy consumption for this particular textile category. The measurements show that the energy consumption is approximately 30% higher than for ordinary hotel bed linen. As the figure is based on data from only one source, Nordic Ecolabelling has chosen to increase the factor value for linen for holiday cottage accommodation by approximately 20% compared with hotel bed linen.

O7 Greenhouse gas emissions

The amount of greenhouse gases (A_{GHG}) that the laundry releases must be less than or equal to the threshold value for the laundry's emissions of greenhouse gases (G_{GHG}). The emissions requirements vary for the different textile categories. Table 6 shows the factor values (F_{GHG}) that must be used for the respective textile category. The laundry's G_{GHG} and A_{GHG} must be calculated on an annual basis. The recalculation factors for energy are in Appendix 4.

If the laundry, using metering equipment or relevant calculations, can separate out the following consumption, it is not included in the calculation of A_{GHG} :

- Internal waste water treatment plant.
- 35% of energy consumption for VOC afterburners for laundries that launder industrial cloths.
- Internal dry cleaning of textiles.

Table 6 Factor values for greenhouse gas emissions for different textile categories

Textile categories	Sub-categories	F_{GHG} [gCO ₂ e/kg*]
1) Workwear for industrial/kitchen/butchering and equivalent use Kitchen textiles (cloths and towels)	White workwear, e.g. from the food industry, etc.	470
	Kitchen textiles and towels	
	Coloured workwear and other textiles	
	Textiles for clean rooms	
2) Workwear for institutions/retail/service Shoes	White	370
	Other	

3) Hotels	Hotel linen	250
	Linen for holiday cottage accommodation	315
4) Restaurants	White cloths	435
	White napkins	
	Coloured cloths and other textiles	
5) Hospitals/nursing homes	Blood-stained textiles	410
	Other textiles	
6) Duvets and pillows		485
7) Mops and offshore mats		135
8) Other mats		115
9) Cloth hand towel rolls		280
10) Industrial cloths		595
11) Dry cleaning		-
12) Private clothes from households/institutions	White	555
	Other	
13) Other		95

* No. kg textiles in each textile category is based on data given in requirement O2.

Calculation of G_{GHG} and A_{GHG} :

$$G_{GHG} = \sum [(Proportion)_i \cdot (F_{GHG})_i]$$

A_{GHG} is calculated in line with Appendix 4.

$(F_{GHG})_i$ = Factor value for greenhouse gas emissions in g CO₂ equivalents/kg per textile category.

A_{GHG} = Amount of CO₂ equivalents from emissions from energy use in g/kg laundry at the laundry.

$(Proportion)_i$ = Proportion of a textile category i, which is attained when the annual quantity of laundry in the category is divided by the total annual amount of laundry.

G_{GHG} = Threshold value for total CO₂ equivalent emissions in g/kg laundry at the laundry.

Calculation that shows that A_{GHG} is less than or equal to G_{GHG} .

P3 Greenhouse gas emissions

Points are awarded to laundries with lower greenhouse gas emissions than the levels specified in Table 7.

Table 7 Points for lower greenhouse gas emissions (g CO₂/kg textiles)

Percentage A _{GHG} of G _{GHG}	Points
A _{GHG} is less than 40% of G _{GHG}	10
A _{GHG} is less than 50% of G _{GHG}	8
A _{GHG} is less than 60% of G _{GHG}	6
A _{GHG} is less than 70% of G _{GHG}	4
A _{GHG} is less than 80% of G _{GHG}	2
A _{GHG} is less than 90% of G _{GHG}	1

☒ Calculation showing the number of points scored in relation to Table 7.

Background to requirements O7 and P3

See also background to requirements O6 and P2.

Emissions of CO₂ are closely linked to the laundries' energy consumption and Nordic Ecolabelling has chosen to continue with an obligatory threshold value for the laundry's CO₂ emissions from fuel and electricity consumed at the laundry.

The requirement level is set on the basis of the energy requirement assuming a certain electricity consumption (approximately 0.2 kWh/kg) and on the basis of natural gas as fuel. In popular terms, this means that it will typically be the CO₂ requirement that sets the actual energy requirements for those laundries that use fuels that are more carbon intensive than natural gas, e.g. oil.

The requirement has been tightened up compared with generation 3 of the criteria, see Table 8.

Table 8 Tightening of the factor values for greenhouse gas emissions in g CO₂ equivalents/kg per textile category

Textile categories	Sub-categories	F _{GHG} [gCO ₂ e/kg*]	F _{GHG} [gCO ₂ e/kg*]
		Generation 3	Generation 4
1) Workwear for industrial/kitchen/butchery and equivalent use Kitchen textiles (cloths and towels)	White workwear, e.g. from the food industry, etc.	530	470
	Kitchen textiles and towels		
	Coloured workwear and other textiles		
	Textiles for clean rooms		
2) Workwear for institutions/retail/service Shoes	White	510	370
	Other		
3) Hotels	Hotel linen	310	250
	Linen for holiday cottage accommodation		300
4) Restaurants	White cloths	540	435
	White napkins		
	Coloured cloths and other textiles		
5) Hospitals/nursing homes	Blood-stained textiles	490	410
	Other textiles		
6) Duvets and pillows		590	485
7) Mops and offshore mats		180	135
8) Other mats		160	115
9) Cloth hand towel rolls		340	280
10) Industrial cloths		610	595
11) Dry cleaning		-	-
12) Private clothes from households/institutions	White	670	555
	Other		
13) Other		160	95

* No. kg textiles in each textile category is based on data given in requirement O2.

The CO₂ factors in Appendix 4 are updated using data from the Swedish Environmental Protection Agency (2017). For electricity, Nordic Ecolabelling uses the factor 115 g CO₂/kWh_{el}. For justification, see background to requirements O6 and P2. The factor is based on all electricity being supplied via the electricity network. For self-generated electricity from renewable energy sources, the factor can be halved to 57.5 g/kWh.

O8 Water consumption

The amount of water consumed (A_{water}) at the laundry must be less than or equal to the threshold value of the laundry for water (G_{water}). Water consumption varies for the different textile categories. Table 9 shows the factor values (F_{water}) that are to be used for each category. The laundry's G_{water} and A_{water} must be calculated on an annual basis.

Water consumption covers the laundry's total consumption of mains water and any water from its own well.

Table 9 Factor values for water consumption for different textile categories

Textile categories	Sub-categories	F _{water} [l/kg*]
1) Workwear for industrial/kitchen/butchering and equivalent use Kitchen textiles (cloths and towels)	White workwear, e.g. from the food industry, etc.	19.5
	Kitchen textiles and towels	
	Coloured workwear and other textiles	
	Textiles for clean rooms	
2) Workwear for institutions/retail/service Shoes	White	16.5
	Other	
3) Hotels	Hotel linen	10.0
	Linen for holiday cottage accommodation	
4) Restaurants	White cloths	17.0
	White napkins	
	Coloured cloths and other textiles	
5) Hospitals/nursing homes	Blood-stained textiles	13.5
	Other textiles	
6) Duvets and pillows		24.0
7) Mops and offshore mats		7.0
8) Other mats		6.5
9) Cloth hand towel rolls		9.5
10) Industrial cloths		11.0
11) Dry cleaning		0.0
12) Private clothes from households/institutions	White	17.0
	Other	
13) Other		7.0

* No. kg textiles in each textile category is based on data given in requirement O2.

Calculation of the laundry's A_{water} and G_{water}:

$$G_{water} = \sum [(Proportion)_i \cdot (F_{water})_i]$$

(F_{water})_i = Factor value for water consumption in litres of water/kg laundry per textile category.

(Proportion)_i = Proportion of a textile category i, which is attained when the annual quantity of laundry in the category is divided by the total annual amount of laundry.

G_{water} = Threshold value for total water consumption in l/kg of laundry at the laundry

A_{water} = Water used in litres/kg laundry at the laundry.

Calculation to show that the requirement is fulfilled.

Data to substantiate the calculation.

P4 Water consumption

Points are awarded to laundries with a lower water consumption than the requirement levels specified in Table 10.

Table 10 Points for low water consumption

Percentage A_{water} of G_{water}	Points
A_{water} is less than 50% of G_{water}	5
A_{water} is less than 60% of G_{water}	4
A_{water} is less than 70% of G_{water}	3
A_{water} is less than 80% of G_{water}	2
A_{water} is less than 90% of G_{water}	1

☒ Calculation showing the number of points scored in relation to Table 10.

Background to requirements O8 and P4

Water is used at the laundry each time the textiles have to be washed, such that a large amount of water is used to wash a textile during its entire life cycle. However, it should be noted that it is not the laundry's water consumption that is the dominant factor. This is due to the fact that a large proportion of the textiles are made from cotton, which demands a large amount of water to grow. Approximately half of the world's cotton plantations are artificially watered. Water consumption for artificial watering of cotton is more than 7,000 litres per kg cotton as a global average even when including the land that is not artificially watered (Frydendal, 1998). By comparison, a laundry uses about 10 litres of water on average, in round numbers, per kg of laundry, which with 100 washes in the life cycle of a textile produces a water consumption at the laundry in the region of 1,000 litres of water per kg – in other words somewhat less than for growing cotton. However, it should be noted that not all textiles at a laundry are made of cotton.

As far as water consumption is concerned, setting requirements governing water consumption for growing cotton is not steerable. Cotton is produced by local farmers in many regions of the world and is traded on large exchanges. When manufacturing textiles, the cotton included in an individual textile will typically come from many different farmers in many different regions to ensure uniform quality. The part of the water consumption that takes place at the laundry, however, is steerable, and even if it is not the largest contributor, it always involves considerable consumption. Reduced water consumption at the laundry can also have a number of other benefits, such as reduced energy consumption, in that less water needs to be heated up and it is easier to recirculate the energy in the hot water. Nordic Ecolabelling has therefore chosen to set requirements on water consumption at the laundry to exclude laundries with an extremely high water consumption from Nordic Swan Ecolabelling. However, we do not see water consumption as the most important environmental parameter for a laundry.

The amount of water needed to wash the garment largely depends on the type of textiles washed, and the requirements are differentiated for this reason. A mat for example does not have very high requirements in terms of the quality of the washing water and therefore it becomes easier to recirculate the water and thus attain savings, while, for example, a pillow has a high volume, and puffs up in the drum more than other textiles, which produces higher water consumption.

Licensees and chemicals producers with whom Nordic Ecolabelling has been in contact during the revision have clearly signalled that the water consumption requirement should not be lowered further. This is because it could involve risks from a hygiene point of view. Too little water for rinsing can also result in chemicals residues remaining in the textiles after washing. In addition, the laundries can encounter problems in meeting emissions requirements imposed by municipalities/authorities as these are often set in relation to the concentration (mg/l) instead of total emissions, see the background to requirement O26. The requirement limit is therefore the same as in generation 3 of the criteria.

7.4 Laundry chemicals

Laundry chemicals refers to all chemicals that come into contact with the textile before, during and after the process (for example impregnation, stain removers, textile dyes). For several of the chemicals requirements it may be relevant for Nordic Ecolabelling to receive documentation directly and in confidence from the chemicals supplier. In the light of this documentation, Nordic Ecolabelling will be able to give licensees feedback on whether or not the requirement is met.

The requirements in the criteria document and accompanying appendices apply to all ingoing substances in the chemical product. Impurities are not regarded as ingoing substances and are exempt from the requirements.

Ingoing substances and impurities are defined below, unless stated otherwise in the requirements.

- Ingoing substances: all substances in the chemical product, including additives (e.g. preservatives and stabilisers) in the raw materials. Substances known to be released from ingoing substances (e.g. formaldehyde, arylamine, in situ-generated preservatives) are also regarded as ingoing substances.
- Impurities: residuals, pollutants, contaminants etc. from production, incl. production of raw materials that remain in the raw material/ingredient and/or in the in the chemical product in concentrations less than 100 ppm (0,0100 w-%, 100 mg/kg) in the chemical product.

Examples of impurities are residues of the following: residues or reagents incl. residues of monomers, catalysts, by-products, scavengers, and detergents for production equipment and carry-over from other or previous production lines.

The chemicals side is one of several areas in which Nordic Ecolabelling has made and continues to make a big difference. The requirement has encouraged several laundries to phase out several substances that are harmful to health or the environment and in several cases the chemicals suppliers have changed the ingredients in their standard products in order to meet the Nordic Swan Ecolabel's requirements. For example, CMR substances, borates, DADMAC and fragrances have been phased out.

Many people are surprised to hear that a laundry typically buys in more laundry chemicals than the amount of textiles cleaned. The Sophus Berendsen group, for example, bought in approximately 1,800 tonnes of textiles in 2000 while its total purchasing of laundry chemicals for the same year was approximately 4,300 tonnes (Berendsen, 2001). Although the references are not based on updated data, the amounts continue to apply. It is clear that the amounts do not say

anything directly about the environmental relevance but on the other hand this helps to draw a picture of the fact that requirements on the chemicals that are used at the laundry should carry a certain weight.

At an industrial laundry many different types of chemicals are used for different purposes (Grüttner, 2008):

- Surfactants
- Complexing agents
- Bleaching agents
- Drying agents
- Other substances such as alkalis, enzymes, optical brighteners and fragrances

In recent years new types of substance have also arisen – e.g. substances that can help to attain good hygiene despite a lower water temperature.

As well as laundry chemicals, the laundries can use a number of other chemicals such as stain removers and impregnation agents, but also to a lesser extent chemicals that do not come into direct contact with the textiles. This concerns, for example, chemicals for cleaning and, where required, disinfecting linen trolleys, boiler chemicals, salt and other chemicals for soaking facilities, as well as lubricants and other substances used in the maintenance of machinery.

However, the process chemicals are by far the most important group and in a life cycle perspective, as set out above, more process chemicals are bought in (in kg including water) than textiles are bought in. The requirements therefore solely address the process chemicals, which are defined as all the chemicals that come into contact with the textiles before, during and after the laundry process. This concerns, for example, stain removers, laundry and bleaching agents, starch, drying agents, impregnation agents, etc.

Requirements are set regarding the chemicals used in relation to the health and environmental problems, and to ensure a low risk to the environment.

O9 Classification of laundry chemicals

Laundry chemicals must not be classified as belonging to the hazard classes and hazard statements in Table 11.

Table 11 Classification of laundry chemicals

CLP Regulation 1272/2008		
Hazard class	Category Code	Hazard statement
Acute toxicity	Category 1–4	H300, H310, H330, H301, H311, H331, H312*, H332*
Specific target organ toxicity after single or repeated exposure	STOT SE category 1–2 STOT RE category 1–2	H370, H371, H372, H373**
Aspiration toxicity	Category 1	H304**
Sensitising** by inhalation or skin contact	Category 1/1A/1B	H334 and H317
Carcinogenicity	Category 1A/1B/2	H350, H351
Germ cell mutagenicity	Category 1A/1B/2	H340, H341
Reproductive toxicity	Category 1A/1B/2	H360, H361, H362

**An exemption applies to products where the classification is the result of the content of oxalic acid (CAS 144-62-7) or peracetic acid (CAS 79-21-0).*

*** Products where the classification is due to the content of enzymes and products for stain removal which are used directly on the stain before laundering are exempt.*

Please note that classification is the responsibility of the chemical manufacturer.

- Safety data sheet for product in line with applicable European legislation (Annex II to REACH, Regulation 1907/2006/EC).
- Completed and signed declaration from the chemical manufacturer (Appendix 5).
- For Nordic Swan Ecolabelled laundry chemicals: State only the product name and licence number.

Background to requirement O9

At laundries the vast majority of the chemicals are handled in automatic dosing equipment where there is little risk of direct contact with the chemicals. However, there is a greater opportunity for exposure, for example, when moving suction lances and similar from an empty chemicals container to a full one and during manual dosing. Nordic Ecolabelling therefore requires that no laundry chemicals may be classified in relation to health effects mentioned in Table 11.

The chemical requirements are designed to reduce the overall environmental impact per functional unit, ie per kilogram of textile. This means that Nordic Ecolabelling limits the content of substances harmful to the environment in laundry chemicals (H410, H411 and H412) per kilogram of textiles in requirement O11 (Content of substances harmful to the environment in laundry chemicals). In this requirement, Nordic Ecolabelling has chosen not to prohibit the hazard statements H400, H410, H411, H412, and H413 on laundry chemicals used by Nordic Swan Ecolabelled laundries.

Chemicals in the hazard classes “Acute toxicity” are not desirable. This is partly because chemical residues may end up in drains after laundry, or emissions may occur during transport and storage. Certain exemptions to the requirement are made for the following reasons:

Oxalic acid (H312) is used in laundries to remove stains, e.g. of rust, that are often seen on textiles and cannot be removed during the general laundry process. There are no listed alternatives to oxalic acid, which is why Nordic Ecolabelling has exempted it from the health hazard classes. If oxalic acid is banned, the amount of textiles thrown away will increase considerably, which is not good for the environment.¹³

Peracetic acid, which is made from combining acetic acid and hydrogen peroxide, is highly reactive and has the advantage that it bleaches and disinfects at a much lower temperature than hydrogen peroxide on its own. In the processes in which peracetic acid is used, there is therefore an opportunity to lower the washing temperature and attain a significant energy saving. So as not to reduce the opportunities of Nordic Swan Ecolabelled laundries of obtaining a greater energy saving, Nordic Ecolabelling has chosen to exempt this substance from the classification requirement.

As will be noticed, products that are solely classified as hazardous to health with H302 (harmful if ingested), are excluded. This is because we are only addressing professional use at laundries, where, for example, no children are present. At the same time, the vast majority of dosing uses automatic dosing systems, so the risk of exposure due to ingestion is minimal.

Stain removal v. disposal

To evaluate what is best in terms of the environment, a simple calculation is set up based on the following realistic assumptions: Stains on cotton textiles of 500 g that have lived half their normal lifetime in the laundry. If the textile is thrown away, 250 g of cotton textiles would have to be manufactured to replace it. This would require more than 250 g of cotton, but for the sake of simplicity we use 250 g. With an economic allocation between fibre (85%) and seeds (15%) cotton growing will give rise to the following consumption based on average cotton production (Frydendal, 2001):

- 1,525 litres of water
- 2.5 g pesticides
- 74.5 g artificial fertiliser
- 5.5 MJ energy

On top of this there is energy, chemicals consumption etc. in the production of textiles (weaving, wet treatment, etc.)

For comparison, a few drops of stain remover are used to pre-treat a stain and this clearly speaks in favour of stain removal over disposal.

The risk of a laundry employee ingesting the stain removal chemicals must be assumed to be very small in a professional situation, where ingesting of food is

¹³ Köcher, Christian; Sales Manager Nordic / Corporate Account Manager Nordic Textile Care, Ecolab. Personal meeting 2008.

always kept separate from production and use of chemicals. In relation to the exposure of the end user, this is a question of stain treatment agents that are used directly on the stain before (re)laundering, where the stain removal agent will be washed out and reduce the exposure of the end user to a minimum and without any opportunity for actual consumption.

The table for classification types that are not permitted for laundry chemicals has been updated in line with the CLP Regulation 1272/2008. Furthermore, the hazard statement “Aspiration toxicity” H304 is now included. Products where the classification is due to the content of enzymes and products for stain removal which are used directly on the stain before laundering are exempt.

O10 Classification of constituent substances in laundry chemicals

Constituent substances in laundry chemicals should not be classified in relation to the hazard classes and hazard statements stated in Table 12.

Table 12 Classification of constituent substances in laundry chemicals

CLP Regulation 1272/2008		
Hazard class	Category Code	Hazard statement
Sensitising by inhalation	Category 1, – only applies to spray products without a foam filter	H334
Carcinogenic	Category 1A/1B/2	H350 H350 H351*
Mutagenic	Category 1A/1B/2	H340 H340 H341
Reprotoxic	Category 1A/1B/2	H360 H360 H361

** NTA as a contaminant in complexing agents is exempted from the requirement, but subject to the limitation that the concentration in the raw materials must be below 0.2% by weight, and that the concentration in the end-product must be below 0.1% by weight.*

- Safety data sheet for product in line with applicable European legislation (Annex II to REACH, Regulation 1907/2006/EC).
- Declaration from the chemicals manufacturer (Appendix 5).
- For Nordic Swan Ecolabelled laundry chemicals: State only the product name and licence number.

Background to requirement O10

At laundries the vast majority of the chemicals are handled in automatic dosing equipment where there is little risk of direct contact with the chemicals.

However, there is a greater opportunity for exposure, for example, when moving suction lances and similar from an empty chemicals container to a full one and during manual dosing. We therefore require that none of the constituent substances in laundry chemicals may be classified as carcinogenic, mutagenic or reprotoxic (CMR).

Spray products may, for example, be relevant in connection with stain removal chemicals, which are used to pre-treat stains directly on the textiles and may contain enzymes that can give rise to allergies on inhalation of dust and aerosols. To avoid exposure to aerosols that may be sensitising on inhalation, we require that none of the constituent substances in spray products may be classified as sensitising with the hazard statement H334. Stain removal agents in spray bottles may not, therefore, contain enzymes.

The table for classification types that are not permitted for constituent substances in Nordic Swan Ecolabelled laundry chemicals has been updated in line with the CLP Regulation 1272/2008. Otherwise there are no amendments compared with generation 3.

O11 Content of substances harmful to the environment in laundry chemicals

The use of substances that are toxic to the aquatic environment and are not readily degradable in the aquatic environment (substances with the hazard statements H410, H411 and H412) is limited as follows:

$$100 * A_{H410} + 10 * A_{H411} + A_{H412} \leq 1.3 \text{ g/kg textiles, where}$$

A_{H410} is the amount of substances with H410 used in g per kg textiles.

A_{H411} is the amount of substances with H411 used in g per kg textiles.

A_{H412} is the amount of substances with H412 used in g per kg textiles.

In other words, substances classified as H410 are weighted 100 times higher than H412.

Exemptions:

- Protease/subtilisin classified as Aquatic chronic 2 H411 is exempt from the requirement. Be aware that the product must also fulfil the requirement O9 on classification of the product.
- Surfactants that are readily degradable*, anaerobically degradable** and are classified with H412.
- Sodium hypochlorite, CAS no. 7681-52-9 and sodium dichloroisocyanurate, dihydrate, CAS no. 51580-86-0, that are classified as H410.
- Peracetic acid, CAS no. 79-21-0.

** Under the DID list (dated 2016 or later) or test method no. 301 A-F or no. 310 in OECD guidelines for testing of chemicals or other equivalent test methods.*

*** Under the DID list (dated 2016 or later) or ISO 11734, ECOTOC no. 28 (June 1988) or equivalent test methods where at least 60% degradability is attained under anaerobic conditions.*

- Summary of the laundry chemicals' content of H410, H411 and H412 classified compounds per kg textiles.
- Calculations showing that the requirement is fulfilled.

Background to requirement O11

Besides the restriction on CDV, Nordic Ecolabelling additionally wants to limit the use of substances that are toxic to the aquatic environment and are not easily degradable in the aquatic environment – in other words substances with the risk phrases H410, H411 and H412. As substances with H410 are more undesirable than substances with, e.g. H412, a factor that takes this into account is added. H410 substances may, however, have considerably higher toxicity than the factor expresses, but it is extremely rare and would hardly apply to the type of substances used in laundries today.

The enzyme protease (Subtilisin, EINECS 232-752-2, CAS 9014-01-1) has been reclassified as environmentally harmful with Aquatic Chronic 2 (H411) under the new classification rules for long-term testing of chronic environmental toxicity, even though protease is readily degradable. Studies show that more than 99.99% of subtilisin is deactivated in treatment plants or in the drainage system on the way to treatment. Subtilisin is an effective enzyme that is mainly used in textile detergents and dishwashing (professional and consumer) to break down protein-based stains. An exemption to the requirement on substances harmful to the environment is necessary to enable producers to continue to produce textile detergents that work well. Protease can only be added in amounts that do not affect the classification of the end product, in other words it does not result in additional products being classified as harmful to the environment.

During the revision the possibility of removing the exemption for surfactants that are easily degradable and anaerobically degradable and are classified with H412 was explored. As the criteria for Nordic Swan Ecolabelling of laundry detergents for professional use includes the same exemption, it could not be removed in the criteria for textile services as these cannot be stricter.

In conjunction with processing applications, experience has been that sodium hypochlorite, CAS no. 7681-52-9, is classified differently by suppliers under the new CLP Regulation. Safety data sheets from different suppliers show that some suppliers classify sodium hypochlorite as H400 and H410 while other suppliers only classify sodium hypochlorite as H400. It was therefore decided that sodium hypochlorite, CAS no. 7681-52-9 and sodium dichloroisocyanurate, dihydrate, CAS no. 51580-86-0, that are classified as H410 are exempt from the requirement.

As a result of the implementation of the CLP Regulation peracetic acid, CAS-No. 79-21-0, has received the harmonized classification H400. In addition, some suppliers classify peracetic acid with H410. Peracetic acid is highly reactive and allows bleaching and disinfection at low temperatures. In processes in which peracetic acid is used, professional laundries have the possibility to wash at lower temperatures and thereby reduce energy consumption. Peracetic acid is therefore exempted from the requirement.

From generation 3 to 4: No changes, only updating.

O12 Restriction of the total dilution volume of laundry chemicals (CDV – critical dilution volume).

For each textile category, Table 13 states factor values for the total critical dilution volume ($F_{CDV_{chronic}}$) of laundry chemicals. Chronic values ($CDV_{chronic}$) are used in the calculation.

Because the substances break down during the laundry process, separate rules apply to three substances:

- Active chlorine, such as sodium hypochlorite – is not included in the calculation of CDV. The use of active chlorine is specifically restricted in requirement O13.
- Hydrogen peroxide (H₂O₂) – is not included in the calculation of CDV.
- Peracetic acid is included in the calculation as acetic acid.

Table 13 Factor values (F) for CDV_{chronic} in different textile categories

Textile categories	Sub-categories	F _{CDVchronic} [litre/kg*]
1) Workwear for industrial/kitchen/butchering and equivalent use Kitchen textiles (cloths and towels)	White workwear, e.g. from the food industry, etc.	180 000
	Kitchen textiles and towels	
	Coloured workwear and other textiles	
	Textiles for clean rooms	
2) Workwear for institutions/retail/service Shoes	White	140 000
	Other	
3) Hotels	Hotel linen	60 000
	Linen for holiday cottage accommodation	70 000
4) Restaurants	White cloths	100 000
	White napkins	
	Coloured cloths and other textiles	
5) Hospitals/nursing homes	Blood-stained textiles	100 000
	Other textiles	
6) Duvets and pillows		60 000
7) Mops and offshore mats		100 000
8) Other mats		60 000
9) Cloth hand towel rolls		60 000
10) Industrial cloths		160 000
11) Dry cleaning		-
12) Private clothes from households/institutions	White	140 000
	Other	
13) Other		60 000

* No. kg textiles in each textile category is based on data given in requirement O2.

Calculation of critical dilution volume (CDV_{chronic}):

$$G_{CDV} = \sum [(Proportion)_i \cdot (F_{CDV})_i]$$

Requirements for CDV: A_{CDV} ≤ G_{CDV}

G_{CDV} = The threshold value for the critical dilution volume of chemicals consumption calculated in litres per kg of textiles delivered. It is the weighted average of factor values that provides the threshold value for a laundry.

$(\text{Proportion})_i$ = Proportion of a textile category i, which is attained when the annual quantity of laundry in the textile category i (excluding relaundering) is divided by the total annual amount of laundry per year (excluding relaundering).

$(F_{\text{CDV}})_i$ = The factor value for CDV in litres per kg textiles for the individual textile category i.

A_{CDV} = The critical dilution volume for the chemicals used in the laundry in litres per kg textiles.

Documentation must primarily refer to the DID list dated 2016 or later. For substances that are not covered by the list or where there is no data on the list, other documentation, e.g. test reports or literature references may be used.

CDV is calculated using the formula below. CDV is calculated for all substances in the individual laundry chemical and for all laundry chemicals covered by the requirement.

$\text{CDV}_{\text{chronic}} = \sum \text{CDV}_i = \sum (\text{dose}_i \times \text{DF}_i \times 1000 / \text{TF}_{\text{chronic}})$, where

dose_i = the input amount of the individual substance in g/kg textiles

DF_i = degradation factor for substance i

$\text{TF}_{\text{chronic}}$ = chronic toxicity factor

- ☒ Calculation of G_{CDV} and A_{CDV} , showing that the requirement is fulfilled. In conjunction with the calculation, a complete recipe (trade name, chemical name, amount, CAS number and DID number for each ingredient in the product) must be given for all products.

Background to requirement O12

The critical dilution volume, CDV, is calculated for all chemicals that come into contact with the textiles, which, for example, includes detergents, bleaching agents, starch, rinsing agents, impregnation agents and stain removal agents. The critical dilution volume is a theoretical value which takes account of the individual substances' toxicity and biodegradability in the environment. The method has been developed in partnership with the EU Ecolabel.

Due to the degradation of the substances in the laundry process, special rules are applied to three substances: active chlorine, hydrogen peroxide and peracetic acid.

Active chlorine, such as sodium hypochlorite, is not included in the calculation of CDV. It is true that the substance can cause problematic halogenated organic compounds in the process that are piped into waste water, but this is not steerable to include in the calculation and the use of active chlorine is already restricted for precisely the same reason, specifically in another requirement in the criteria document.

Hydrogen peroxide is not included in the calculation of CDV, because it is immediately broken down and does not constitute a real risk to the environment.

Peracetic acid is included in the calculation as acetic acid because the substance is rapidly broken down into acetic acid.

Like other chemical product groups, only chronic values are used when calculating CDV.

Below is a summary of the CDV limits in the current criteria for textile services, threshold values for textile laundry agents for professional use (for laundry at both alternative temperature intervals). In textile detergents for professional use (TVMP) the limits are divided into three categories: severely, moderately and lightly soiled. This is a somewhat more simplified division than in the criteria for textile services. In textile services these are divided into 13 different textile categories. In order to compare the thresholds in textile services and TVMP, the following simplified assumption has been made.

Severely soiled: Workwear industrial, workwear institutional, industrial cloths and private garments.

Moderately soiled: Restaurants, hospitals and mops.

Lightly soiled: Hotels, other mats, cloth hand towel rolls, other.

Table 14 Threshold values CDV_{chronic} – summary

Degree of soiling	Textile services generation 3	TVMP 30-40 °C	TVMP 40-60 °C
Severely soiled	225,000 200,000 175,000	150,000	54,000
Moderately soiled	125,000	100,000	35,000
Lightly soiled	75,000	70,000	19,000

In a comparison one should also remember that the CDV requirement for TVMP only needs to cover the basic detergent itself. A laundry that uses a Nordic Swan Ecolabelled basic detergent at normal dosages can thus be at a CDV level of up to 150,000 with the contribution of the basic detergent alone. The contribution from laundry additives, stain removers, rinsing agents, etc. is added on top of this.

A Nordic Swan Ecolabelled laundry must be able to deliver satisfactory quality in all cases – irrespective of its customer base. At the same time, many non-Nordic Swan Ecolabelled laundries use DADMAC, which is banned from use in Nordic Swan Ecolabelled laundries (see more in the background to requirement O16). DADMAC is used by non-Nordic Swan Ecolabelled laundries during the summer season to prevent mold and thus reduce the relaundering. That it is especially in the summer is due to the higher temperature, which increases the growth of microorganisms when moist fabrics are waiting to be washed. The problem is particularly high in the hotel/restaurant sector because the peak season in summer can provide longer storage times before washing.¹⁴ Even very minor consumption of DADMAC will cause very high CDV values. The Nordic Swan Ecolabelled laundries are thus in the forefront far below the average on the market.

¹⁴ Köcher, Christian; Sales Manager Nordic / Corporate Account Manager Nordic Textile Care, Ecolab. Phone call, September 2017.

On the above, Nordic Ecolabelling judges that the requirement thresholds can be tightened up according to Table 15.

Table 15 Tightening factor values for CDV_{chronic} per textile category

Textile categories	Sub-categories	$F_{CDV_{\text{chronic}}}$ [litre/kg*] generation 3	$F_{CDV_{\text{chronic}}}$ [litre/kg*] generation 4
1) Workwear for industrial/kitchen/butchery and equivalent use Kitchen textiles (cloths and towels)	White workwear, e.g. from the food industry, etc.	225,000	180 000
	Kitchen textiles and towels		
	Coloured workwear and other textiles		
	Textiles for clean rooms		
2) Workwear for institutions/retail/service Shoes	White	175,000	140 000
	Other		
3) Hotels	Hotel linen	75,000	60 000
	Linen for holiday cottage accommodation		70 000
4) Restaurants	White cloths	125,000	100 000
	White napkins		
	Coloured cloths and other textiles		
5) Hospitals/nursing homes	Blood-stained textiles	125,000	100 000
	Other textiles		
6) Duvets and pillows		75,000	60 000
7) Mops and offshore mats		125,000	100 000
8) Other mats		75,000	60 000
9) Cloth hand towel rolls		75,000	60 000
10) Industrial cloths		200,000	160 000
11) Dry cleaning		-	-
12) Private clothes from households/institutions	White	175,000	140 000
	Other		
13) Other		75,000	60 000

* No. kg textiles in each textile category is based on data given in requirement O2.

No major consequences for CDV values are expected with use of the DID list dated 2016.

P5 CDV values

Laundries have an opportunity to score points if the following CDV values are attained.

Table 16 Critical dilution volume, CDV – points

Percentage A_{CDV} of G_{CDV}	Points
A_{CDV} is less than 30% of G_{CDV}	5
A_{CDV} is less than 40% of G_{CDV}	4
A_{CDV} is less than 50% of G_{CDV}	3
A_{CDV} is less than 60% of G_{CDV}	2
A_{CDV} is less than 70% of G_{CDV}	1

- Calculation of attained % A_{CDV} of G_{CDV} , showing how many points are attained. See also O12.

Background to requirement P5

The requirement has been tightened by ten percentage points per points level. The actual effect is greater, however, as the obligatory requirement has also been tightened, see requirement O12.

O13 Restriction on the chlorine content of laundry chemicals

For each textile category, Table 17 states factor values for the chlorine content of laundry chemicals (F_{chlorine}).

Table 17 Factor values (F) for Chlorine in different textile categories

Textile categories	Sub-categories	F_{chlorine} [mg/kg*]
1) Workwear for industrial/kitchen/butchering and equivalent use Kitchen textiles (cloths and towels)	White workwear, e.g. from the food industry, etc.	1,500
	Kitchen textiles and towels	1,845
	Coloured workwear and other textiles	0
	Textiles for clean rooms	300
2) Workwear for institutions/retail/service Shoes	White	150
	Other	0
3) Hotels	Hotel linen	115
	Linen for holiday cottage accommodation	
4) Restaurants	White cloths	265
	White napkins	1,500
	Coloured cloths and other textiles	0
5) Hospitals/nursing homes	Blood-stained textiles	1,725
	Other textiles	115
6) Duvets and pillows		0
7) Mops and offshore mats		0
8) Other mats		0
9) Cloth hand towel rolls		20
10) Industrial cloths		0
11) Dry cleaning		0
12) Private clothes from households/institutions	White	150
	Other	0
13) Other		0

* No. kg textiles in each textile category is based on data given in requirement O2.

Chlorine calculation:

$$G_{\text{chlorine}} = \sum [(Proportion)_i \cdot (F_{\text{chlorine}})_i]$$

Requirements for chlorine: $A_{\text{chlorine}} \leq G_{\text{chlorine}}$

G_{chlorine} = The threshold value for the consumption of active chlorine at a laundry measured in mg active chlorine per kg textiles delivered. It is the weighted average of factor values that provides the threshold value for a laundry.

$(\text{Proportion})_i$ = Proportion of a textile category i, which is attained when the annual quantity of laundry in the textile category i (excluding relaundering) is divided by the total annual amount of laundry per year (excluding relaundering).

$(F_{\text{chlorine}})_i$ = The factor value for active chlorine in litres per kg textiles for the individual textile category i.

A_{chlorine} = The used amount of active chlorine at the laundry in mg per kg textiles.

- ☒ Calculation of G_{chlorine} and A_{chlorine} , showing that the requirement is fulfilled.

Background to requirement O13

Large amounts of active chlorine compounds, such as sodium hypochlorite, have previously been used in many laundries. Today consumption has reduced but Nordic Ecolabelling knows that there are still many laundries that use chlorine in cases where it is not necessary – or use higher doses of chlorine than necessary. Active chlorine compounds are toxic for the environment themselves, but they are reactive and thus break down, but in the reaction with organic substances can create organochlorides with harmful environmental properties. On the other hand, the use of chlorine can in some cases mean a reduction in the amount of textiles thrown away. This concerns, for example, damp-stained textiles and a number of other severe stains that can only be removed by relaundering with chlorine. This is reflected in our threshold values for the use of chlorine in the different textile categories, that are further divided to ensure that the threshold reflects actual needs as far as possible.

Nordic Ecolabelling has chosen to set limits on the total consumption of active chlorine per kg washed textiles (excluding relaundering – note, however, that chlorine for relaundering is included in the amount of chlorine consumed). However, the requirements are set, as far as possible so that in practice it can only be used where there really is a genuine need – i.e. in extremely soiled laundry and in relaundering.

Being tough on chlorine can have a downside in terms of throwing away more and thus place a greater burden on the environment in terms of growing cotton and manufacture of new textiles. Therefore no changes have been made to the requirements from generation 3 to 4.

P6 Low consumption of chlorine

Laundries can earn points from low use of chlorine as stated in Table 18 below.

The number of points depends on the proportion of textiles where chlorine is often used (in other words a high factor value for chlorine, F_{chlorine} , and on relatively low chlorine consumption, A_{chlorine} , in relation to this.

Table 18 Chlorine consumption and points scored

Percentage A_{chlorine} : ($A_{\text{chlorine}} / G_{\text{chlorine}}$) * 100%	Threshold value for chlorine, G_{chlorine}			
	$0 \leq G_{\text{chlorine}} \leq 20$	$20 \leq G_{\text{chlorine}} \leq 65$	$65 \leq G_{\text{chlorine}} \leq 330$	$G_{\text{chlorine}} > 330$
A_{chlorine} is less than 50% of G_{chlorine} or no chlorine consumption	2 points	5 points	8 points	10 points
A_{chlorine} is less than 60% of G_{chlorine}	1 point	4 points	6 points	8 points
A_{chlorine} is less than 70% of G_{chlorine}	1 point	3 points	5 points	6 points
A_{chlorine} is less than 80% of G_{chlorine}	0 points	2 points	3 points	4 points
A_{chlorine} is less than 90% of G_{chlorine}	0 points	1 point	2 points	2 points

☒ Calculation of % that A_{chlorine} constitutes of G_{chlorine} , showing the number of points scored. See also O13.

Background to requirement P6

In relation to the licensing data, about 80% of the laundries have chlorine consumption at 2/3 of the threshold value or less. This means there are grounds to tighten up the potential points scored for chlorine. The point score requirement has been tightened up by 1/3, which means that not everyone will be able to score points. The obligatory chlorine requirement is not tightened up in the same way, as this would result in making it easier for laundries in locations with a damper and warmer climate to suffer mould on the textiles (damp staining). If the aim is to avoid these textiles being thrown away, the use of chlorine is necessary.

O14 Restriction on the content of non-anaerobically degradable substances in laundry chemicals

For each textile category, Table 19 states factor values for the content of non-anaerobically degradable substances in laundry chemicals (F_{anNBO}).

Table 19 Factor values (F) non-anaerobically degradable substances (anNBO) in different textile categories

Textile categories	Sub-categories	F_{anNBO} [g/kg*]
1) Workwear for industrial/kitchen/butchering and equivalent use Kitchen textiles (cloths and towels)	White workwear, e.g. from the food industry, etc.	1.75
	Kitchen textiles and towels	
	Coloured workwear and other textiles	
	Textiles for clean rooms	
2) Workwear for institutions/retail/service Shoes	White	1.25
	Other	
3) Hotels	Hotel linen	0.60
	Linen for holiday cottage accommodation	
4) Restaurants	White cloths	1.10
	White napkins	
	Coloured cloths and other textiles	

5) Hospitals/nursing homes	Blood-stained textiles	1.00
	Other textiles	
6) Duvets and pillows		0.60
7) Mops and offshore mats		1.00
8) Other mats		0.75
9) Cloth hand towel rolls		0.60
10) Industrial cloths		1.50
11) Dry cleaning		0.00
12) Private clothes from households/institutions	White	1.25
	Other	
13) Other		0.60

* No. kg textiles in each textile category is based on data given in requirement O2.

Calculation of substances that are not anaerobically degradable (anNBO):

$$G_{anNBO} = \sum [(Proportion)_i \cdot (F_{anNBO})_i]$$

Requirements for anNBO: $A_{anNBO} \leq G_{anNBO}$

G_{anNBO} = The threshold value for the consumption of substances that are not anaerobically degradable, at a laundry measured in g anNBO per kg textiles delivered. It is the weighted average of factor values that provides the threshold value for a laundry.

$(F_{anNBO})_i$ = The factor value in g-anNBO per kg textiles for the individual textile category i.

A_{anNBO} = The amount of anNBO used in the laundry in g anNBO per kg textiles.

Iminodisuccinate can be exempted from the calculation of anNBO.

Documentation of anaerobic degradability must primarily refer to the DID list dated 2016 or later. For substances that are not covered by the list or where there is no data on the list, other documentation, e.g. test reports or literature references may be used.

Substances that are not surfactants can be exempted from the requirement on anaerobic degradability if any of the following three alternatives are met:

- Readily degradable and low adsorption ($A < 25\%$) or
- Readily degradable and high adsorption ($D > 25\%$) or
- Readily degradable and not bioaccumulative.

Tests for adsorption/desorption can be carried out under OECD Guidelines 106 or ISO CD 18749 "Water quality – Adsorption of substance activated sludge".

Calculation of G_{anNBO} and A_{anNBO} , showing that the requirement is fulfilled.

Background to requirement O14

Nordic Ecolabelling limits the content of organic substances that are not anaerobically degradable in the chemicals to ensure that no more substances that

are not immediately anaerobically degradable are discharged into the environment than necessary. The DID list uses the term anNBO = Y for substances that are anaerobically degradable.

The data examined during the evaluation showed a large spread for anNBO. In the revision attempts were made to find a reason but were unsuccessful. Notwithstanding this, the requirement level cannot be lowered in general terms because it is in line with the requirement level for textile laundry detergents for professional use:

Lightly soiled: 0.50 / Moderately: 0.85 / Severely: 1.50.

A laundry that only uses Nordic Swan Ecolabelled laundry chemicals must be able to meet the equivalent requirements for laundries. The requirement therefore remains unchanged compared with generation 3.

O15 Wash-active surfactants, ready degradability aerobically and anaerobically

All wash-active surfactants must be readily aerobically degradable under test method 301 A-F in OECD guidelines for testing of chemicals or other equivalent test methods.

All wash-active surfactants must be anaerobically degradable, which means at least 60% degradability under anaerobic conditions under ISO 11734, ECETOC no 28 or equivalent test methods.

Documentation must primarily refer to the DID list dated 2016 or later. For surfactants that are not covered by the list or where the data on the DID list is deficient, other documentation, e.g. test reports or literature references may be used.

- Reference to the DID list dated 2016 or later. For surfactants that are not covered by the list or where the data on the DID list is deficient, other documentation, e.g. test reports or literature references may be used.
- For Nordic Swan Ecolabelled laundry chemicals: State only the product name and licence number.

Background to requirement O15

Aerobic and anaerobic biodegradability of surfactants has been a standard requirement for surfactants in Nordic Swan Ecolabelled products. Since 2005, ready biodegradability of surfactants has been a legal requirement for products sold on the European market under the Detergents Regulation.

However, there are opportunities for exemptions from the Detergents Regulation for products for professional use. So far, this opportunity has only been used once in the EU, for a surfactant that can be used in CIP products. Because the opportunity exists, Nordic Ecolabelling considers that it is important to require surfactants (irrespective of function) to be degradable in both aerobic and anaerobic conditions.

The requirement therefore remains unchanged compared with generation 3.

O16 Substances that must not be included in the laundry chemical

The laundry chemical may not contain the following substances:

- Alkylphenol ethoxylates (APEO) and/or alkylphenol derivatives (APD)
- LAS (linear alkylbenzene sulphonates)
- (DADMAC) Diallyldimethylammonium chloride
- Fluorine surfactants and other per- and polyfluorinated compounds (PFC)*
- Boric acid and borates
- Optical brighteners
- Fragrance
- Triclosan
- EDTA (Ethylene diamine tetraacetate) and its salts
- Phosphates
- Substances that have been evaluated in the EU as being PBT (persistent, bioaccumulative and toxic substances) or vPvB (very persistent and very bioaccumulative) in Annex XIII of REACH and substances that are not yet evaluated but which meet these criteria.
- Substances considered to be potential endocrine disruptors in category 1 or 2 under official EU lists. The EU's report on endocrine disruptors can be read in its entirety at http://ec.europa.eu/environment/chemicals/endocrine/pdf/final_report_2007.pdf (annex L, page 238 onwards)
- Substances on the Candidate list <http://echa.europa.eu/candidate-list-table>
- Halogenated flame retardants
- Nanomaterials/particles**

** Impregnation agents for personal clothing are exempt. PFOS and/or PFOA are prohibited in all applications, however.*

***Nanomaterials/particles are defined in accordance with the European Commission's definition of nanomaterials dated 18 October 2011, "A natural, incidental or purposely manufactured material containing particles, in an unbound state or as an aggregate or as an agglomerate and where, for at least 50% of the particles in the number size distribution, one or more external dimensions are in the size range of 1–100 nm." Examples are ZnO, TiO₂, SiO₂, Ag and laponite with particles of nanosize in concentrations exceeding 50%. Polymer emulsions are not considered to be nanomaterial.*

- Declaration from chemicals manufacturer showing that the requirement is fulfilled (completed Appendix 5).

- ☒ For Nordic Swan Ecolabelled laundry chemicals: State only the product name and licence number.

Background to requirement O16

There are several problematic substances that are difficult to exclude through general requirements on the chemistry of the product. For this reason Nordic Ecolabelling has drawn up a list of substances that must not be included. The aim of the list is to ban the substances that are not excluded in other requirements but which are associated with environmental and health risks. However, for clarity's sake some substances are included even if they are prohibited under other requirements. The list also contains double requirements. For example, some PBT substances are included in SVHC substances.

Alkylphenol ethoxylates (APEO) and/or alkylphenol derivatives (APD) are a group of surfactants that have shown endocrine disruptive properties. The substances have been phased out in the majority of products due to legislative requirements, but we have sometimes found them in raw materials and therefore we explicitly prohibit them in this criteria document.

LAS (linear alkylbenzene sulphonates) are a group of surfactants that have anaerobic degradability of 0% and are therefore undesirable. The substances are excluded by the requirement on surfactants but for the sake of clarity we have chosen to explicitly describe their exclusion.

DADMAC (dialkyl dimethyl ammonium chloride) is a group of substances with very high ecotoxicity, which is why the substance is often used as a last resort in the summer to protect textiles against damp stains. We consider that with better production planning the use of this type of environmentally harmful substance could be avoided. DADMAC is excluded by the requirement on surfactants but for the sake of clarity we have chosen to explicitly describe its exclusion.

Fluorine surfactants and other per- and polyfluorinated compounds (PFCs) constitute a group of substances that have harmful properties. Certain per- and polyfluorinated compounds can be broken down into the very stable PFOS (perfluorooctane sulphonate) and PFOA (perfluorooctanoic acid) and similar substances. These substances are found all over the globe, from the large oceans to the Arctic. PFOS have also been found in birds and fish and in their eggs. The substances are extremely persistent and are easily absorbed by the body. The substances in this group impact on the biological processes of the body and are suspected to be endocrine disruptors, carcinogenic and to have a negative impact on the human immune system. PFOA, APFO (ammonium pentadecene fluoro octanoate) and certain fluoride acids are on the Candidate list due to their reprotoxicity, as well as PBT. There are new research results showing that shorter chains (2-6 carbon atoms) have been discovered in nature.

Personal protective clothing for the Defence forces and fire brigades but also for other areas need to be reimpregnated with fluorocarbons (PFCs) when laundered. The alternatives that exist are largely wax-based. They do not have the same heat stability as PFCs and cannot restore oil resistance and protect against oleophilic chemicals. As there are no ideal alternatives available on the market, Nordic Ecolabelling makes an exemption for impregnation agents for personal protective clothing. PFOS and PFOA, which are considered to be the

most problematic substances in the group, however, are prohibited in all applications.

Boric acid and borates. Borates are used in laundry chemicals as bleaches and several of these, including boric acid, are classified as harmful for reproduction (EU, 2008).

Optical brighteners make the textiles artificially “whiter” by embedding themselves in the textiles and reflecting more blue light so that they look brighter. Experience from the laundry industry shows that optical brighteners are not necessary and customers only notice that products washed without optical whiteners do not appear totally as bright if they hold textiles washed with and without optical brighteners up against each other. Optical brighteners can therefore be considered unnecessary and although more eco-friendly substances have been developed for optical brighteners in recent years, we see no grounds to permit their use in Nordic Swan Ecolabelled textile services.

Fragrances can contain substances that have an effect on both the environment and health. At the same time, the use of fragrances in the laundry process can mean the involuntary exposure of end users of the textiles. In addition, fragrance is unnecessary and does not contribute towards a better laundry result. Therefore, we do not permit the use of fragrance in the products that come into contact with the textiles.

Triclosan is an antibacterial and a disinfectant which is used in many different products. There is concern that use of antibacterials and disinfectants such as triclosan may contribute towards increasing bacterial resistance (Miljøstatus i Norge, 2008A). Triclosan is bioaccumulative and classified as environmentally harmful and is on the Miljødirektoratet Priority List – a list of substances whose use the authorities in Norway wish to significantly reduce (Miljøstatus i Norge, 2008A) and on the Danish Environmental Protection Agency's list of undesirable substances (Danish Environmental Protection Agency, 2004). Studies show that on contact with sunlight, triclosan is broken down to dioxins that are harmful to health (Bakke, 2003). Triclosan is found in a number of different places, e.g. in drainage sludge and in waste water from treatment works (Dye et al, 2007), which indicates that the use of triclosan brings with it environmental exposure.

EDTA is a powerful complexing agent, which can bind metal ions and therefore is also suspected of being able to mobilise heavy metals in the aquatic environment. However, this is a property that the industry has questioned (Cefic, 2003). EDTA is not readily degradable and the EU's risk assessment states that with the conditions in municipal water treatment plants, EDTA will not break down or only to a very limited extent (Cefic, 2002). EDTA has been permitted in the earlier criteria for professional textile laundry chemicals (version 1.2) and laundries (version 1.4) in Norway and in other areas where there has been a ban on the use of phosphorus. Today, however, more environmentally friendly alternatives exist, that are biodegradable and can replace EDTA. These include MGDA (methylglycindiactic acid), which is why we have chosen to completely prohibit the use of EDTA.

Phosphorus is a component in the complexing agents phosphate and phosphonate. Phosphorus piped to the aquatic environment contributes towards nutrient loading which can result in algae formation and oxygen depletion. When

the waste water is piped through treatment facilities, some of the phosphorus is caught in the waste water, but some slips through. In a resource context phosphorus is something that is focused on to a greater extent and phosphorus is viewed as a scarce resource. Phosphates are hardly used in laundry chemicals for laundries these days, but phosphonate is used to stabilise hydrogen peroxide and peracetic acid (which are used as disinfectants and bleaching agents).

PBT (persistent, bioaccumulative and toxic) and vPvB (very persistent and very bioaccumulative) are organic substances as defined in Annex XIII of REACH (Directive 1907/2006/EC). Nordic Ecolabelling does not generally wish to have these substances.

Most PBT/vPvB are excluded automatically from detergents due to the restrictions on environmentally hazardous substances and non-biodegradable substances. Since some of them, primarily vPvB, may possibly not be excluded in accordance with Ox, they are prohibited by Nordic Ecolabelling.

The requirement states that substances that have not yet been investigated but which fulfil the criteria for PBT and vPvB are also prohibited. The prohibition also applies to PBT and vPvB substances on the SIN list that are not yet on the SVHC list.

Endocrine disruptors are substances which can affect the endocrine balance of people and animals. Hormones control a number of processes in the body and are particularly important for the growth and development of humans, animals and plants. Changes to the hormone balance can have undesirable effects and there is a particular focus on hormones that can affect sexual development and fertility. Several studies have shown effects on animals that can be assumed to be due to an impact on the hormone balance. Emissions to the aquatic environment are one of the main sources of emission and spread of endocrine disruptors. (Miljøstatus i Norge, 2008B) The European Commission is now developing criteria for endocrine disruptors. Nordic Ecolabelling is monitoring this development and may change the requirement once the EU criteria for the identification of endocrine disruptors are published.

Substances on the candidate list and substances that are expected to be added to the candidate list are not expected to be used in the products used at Nordic Swan Ecolabelled laundries today as such substances will be excluded by other requirements. However, some substances can be assessed individually and be added to the list even if they are not CMR, PBT or vPvB substances and perhaps will not be included within the Nordic Swan Ecolabel's prohibition on endocrine disruptors. Although it is very unlikely that this would be the case – and that such a substance would be relevant to laundry chemicals, Nordic Ecolabelling has chosen to create an explicit prohibition which will also ensure harmonisation with equivalent requirements in other criteria.

Halogenated flame retardants include many substances harmful to the environment and to health, which are very toxic to aquatic organisms, carcinogenic or otherwise harmful to health. The compounds are not readily degradable in the environment, which increases the risk of harmful effects from these substances (Miljøvejledninger, 2008). Flame retardants can occur at laundries as specialist textiles impregnated with flame retardants often have to

be regenerated to retain their flame retardant properties, and this can be done at the laundry (Glensvig et al., 2005).

Nanoparticles (from nanomaterials¹⁵) must not be actively added, unless it is documented that they will not cause environmental and health problems. Nanoparticles include nanosilver, nanogold and nanocopper. Particular attention is being paid to nanometals such as nanosilver and nanocopper, since they occur in many products ranging from socks to refrigerators to gain an antibacterial effect. Substances such as nanosilver are classified as biocides by the US Environmental Protection Agency (EPA). There has been a particular concern that emissions of nanosilver into effluent and other dispersal could eliminate desirable bacteria and cause resistance in bacteria.

Nordic Ecolabelling has been in contact with several producers of laundry chemicals during this revision. One of the topics discussed was the prohibition on optical brighteners. Here the producers' views varied somewhat. Some felt that a prohibition was unproblematic while others considered that it could lead to more textiles being thrown away due to greying and other reasons. Optical brighteners are not readily degradable substances. Where light is present, optical brighteners are, however, photodegradable (the HERA project 2003 and 2004), as has been shown by several studies, but as there is less daylight in the Nordic countries in the winter than in the rest of Europe, avoiding optical brighteners is a constant problem. Optical brighteners absorb sludge in treatment works, which is undesirable, as the aim is to avoid chemicals in sludge as far as possible. Optical brighteners are constantly being considered, e.g. in Sweden, and were cited in a list of substances that the Swedish Environmental Protection Agency investigated in 2010 (Swedish Environmental Protection Agency, 2010). Nordic Ecolabelling therefore retains the prohibition on optical brighteners.

The requirement has been tightened up compared with generation 3 with respect to phosphates.

O17 Proportion of ecolabelled laundry chemicals

A minimum of 30% by weight of laundry chemicals must be ecolabelled on an annual basis.

An ecolabelled laundry chemical is marked with the Nordic Swan Ecolabel, the EU Ecolabel or Bra Miljöval.

Two alternative calculations can be used here:

- a) For groups, the calculations can be done at group level, or calculations can be by laundry (as in alternative b).
- b) For individual laundries, textile detergents based on peracetic acid, chlorine, hydrogen peroxide and alkalis can be exempt from the calculations.

Calculation with a summary of the product name, type of label, licence number/statement of the duration of the licence and amount on an annual basis.

Alternative a): State data for all chemicals for each laundry. Based on this a total calculation is produced for the group.

¹⁵ The definition of nanomaterial follows the European Commission's definition of nanomaterials from 18 October 2011.

Alternative b): State data for all chemicals but only produce calculations for the chemicals that are not exempt from requirements.

Background to requirement O17

A large proportion of the chemicals used in the industry can be ecolabelled in ecolabelling systems in the Nordic countries (e.g. the Nordic Swan Ecolabel, the EU Ecolabel and Bra Miljöval). The proportion of ecolabelled textile detergents for the professional market has increased in recent years. In addition, the requirements for non-ecolabelled chemicals are relatively limited compared with the requirements made of ecolabelled chemicals, making it important to have a certain proportion of ecolabelled products.

The requirement is easy to document because lists of the chemicals that are ecolabelled and the amounts purchased can be obtained from chemicals suppliers.

An obligatory requirement is now introduced on the proportion of ecolabelled laundry detergents for professional use. This is in line with requirements in other criteria for services such as Nordic Swan Ecolabelling of Cleaning Services. However, the requirement level is set relatively low. This is because there are some products that are considered necessary for individual laundries that cannot be ecolabelled (such as substances based on peracetic acid).

The requirement is new compared with generation 3 of the criteria.

P7 Points for ecolabelled laundry detergents

Use of ecolabelled laundry detergents for professional use, score points as stated in Table 20.

Table 20 Potential points for ecolabelled laundry detergents

Proportion of laundry detergents labelled with the Nordic Swan Ecolabel, the EU Ecolabel and/or Bra Miljöval	Points
90% by weight or higher	8
70% by weight or higher	6
50% by weight or higher	4
30% by weight or higher	2
10% by weight or higher	1

☒ Calculation with a summary of the product name, type of label, licence number and amount on an annual basis.

Background to requirement P7

A large proportion of the chemicals used in the industry can be ecolabelled in ecolabelling systems in the Nordic countries (e.g. the Nordic Swan Ecolabel, the EU Ecolabel and Bra Miljöval). The proportion of ecolabelled textile detergents for the professional market has increased in recent years. In addition, the requirements for non-ecolabelled chemicals are relatively limited compared with the requirements made of ecolabelled chemicals, making it important to have a certain proportion of ecolabelled products.

The requirement is easy to document because lists of the chemicals that are ecolabelled and the amounts purchased can be obtained from chemicals suppliers.

The requirement has been tightened up compared with generation 3 of the criteria such that fewer points are scored per points level.

7.5 Transport

This chapter contains requirements on transport, internal and external, of textiles to and from customers.

O18 Training in eco-driving

All drivers who transport textiles between the Nordic Swan Ecolabelled laundry and the customer must have completed a course in eco/economic driving run by an external/competent course provider. Newly employed drivers must complete the course within 12 months of employment.

For external transporters the requirement applies from the point when the laundry enters into a new contract with an external transporter.

- Procedure to ensure training of own drivers.
- Confirmation from an external/competent course provider that drivers (own and external) have attended a course in eco/economical driving.
- Procedure to ensure that external transporters fulfil the Nordic Swan Ecolabel's requirements on entering into new contracts.
- For external transporters, a copy of contracts must be made available to Nordic Ecolabelling on request.

O19 Requirements for vehicles

- a) Newly purchased and newly leased vehicles for transporting textiles must fulfil the latest applicable Euro emissions standard at the date of purchase. This applies from the date of applying for a Nordic Swan Ecolabel licence.

Newly produced vehicles will always comply with the most recent applicable Euro emissions standard.

The requirement does not apply to electric vehicles and other types of vehicle where there is no Euro emissions standard.

- b) No vehicles used to transport textiles between the Nordic Swan Ecolabelled laundry and customers must be more than ten years old – calculated from the first date of registration – or must alternatively comply with the most recent applicable Euro emissions standard.

For external transporters, the requirement applies from the point when the laundry enters into a new contract with an external transporter.

- Purchasing procedure that ensures that the requirements are met.
- Documentation of compliance with the requirement on individual new purchases/new leasings must be available for Nordic Ecolabelling on request.

- ☒ Summary of the total fleet with registration numbers and first date of registration. For vehicles more than ten years old, documentation of compliance with the most recent applicable Euro emissions standard must be appended.
- ☒ Procedure to ensure that external transporters fulfil the Nordic Swan Ecolabel's requirements on entering into new contracts.
- ℙ For external transporters, a copy of contracts – and a summary of the vehicles the transporter uses for driving for the Nordic Swan Ecolabelled laundry must be available to Nordic Ecolabelling on request.

Background to requirements O18 and O19

Distribution between laundry and customer has a lower environmental impact than many people think. A life cycle analysis of cloth hand towel rolls (Schmidt, 2000) shows, for example, that energy consumption for distribution only amounts to 5%, while energy consumption at the laundry amounts to 80% of the total energy consumption in the life cycle (Frydendal, Schmidt & Zeuthen, 2000). This is partly due to the fact that vehicle capacity is typically used fairly well as the vehicles never drive empty as they pick up soiled textiles for the return journey. However, transport does have a certain impact which is not reduced by laundries becoming more specialised, with greater distances between the laundry and its customers. Experience of specialisation in Denmark has shown, however, that the environmental savings that laundries can attain from specialisation far exceed the increased environmental burden from having to transport the textiles longer distances between customer and laundry. Similar specialisation is increasingly being seen in Norway, where, for example, hospital laundry (requiring high laundry temperatures) justifies transport over longer distances.

Although the transport does not account for the greatest environmental impact, it is steerable and is very visible to the laundry's customers. At the same time, transport in general is an increasing problem in terms of its impact on the environment and health of society. Furthermore, in certain cases – e.g. for mat services – transport can constitute a more significant part of the environmental burden due to lower energy consumption at the laundry and a greater proportion of distribution to small customers. Nordic Ecolabelling has therefore chosen to make a number of requirements on distribution between laundry and customer although this is not the main focus of the criteria.

According to Green (2000) several laundries have outsourced distribution to external transporters, and this has been taken into account in setting the requirements.

One of these requirements is that all drivers (both internal and external drivers who drive for the licensee) must have completed a course in eco-driving run by a competent course operator (external or internal). However, where new drivers are employed, they must only complete such a course within 12 months of employment. Eco-driving usually saves 16-20% of fuel and equivalent CO₂ emissions. Individuals have saved up to 30% following a course in eco-driving.¹⁶

The technology in vehicles is constantly being updated and engines are becoming more efficient, with less pollution, as shown by the tighter emissions

¹⁶ Schjerpen, Mary; NAF (Norsk automobil forbund), phone conversation, September 2016.

requirements for vehicles as exemplified below by the Euro emissions standards for diesel lorries.

Table 21 Emission requirements for type approval of engines for heavy vehicles in g/kWh (DieselNet, 2017)

Directive (year of registration)	NOx	PM	HC	CO	CO2
Euro I (1994-1996)	8.0	0.36/0.61	1.1	4.5	None
Euro I (1997-2000)	7.0	0.15/0.25	1.1	4.0	None
Euro III (2001-2006)	5.0	0.1	0.66	2.1	None
Euro IV (2007-2008)	3.5	0.02	0.46	1.5	None
Euro V (2009 -2014)	2.0	0.02	0.46	1.5	None
Euro VI (2013/14-)	0.4	0.01	0.13	1.5	None

When buying cars and/or signing leasing agreements (both internally and with external transporters) Nordic Ecolabelling requires that the vehicles that are used to distribute textiles at least comply with the most recent applicable Euro emissions standard. From January 2013 this means Euro VI for lorries and EURO 5b for goods vehicles and cars (DieselNet, 2017). As new vehicles must comply with the EU's most recently applicable class/standard, in practice this means that the requirement is fulfilled as long as new vehicles are purchased.

To ensure that the Nordic Swan Ecolabelled businesses have a modern fleet with low levels of pollution, vehicles that are more than 10 years old are not permitted, unless it can be documented that they comply with the most recent applicable Euro emissions standard. In other words, they must not pollute more than an equivalent new vehicle.

In generation 4, Nordic Ecolabelling wishes to make clear that the transport requirements apply whether the laundry uses its own drivers/vehicles or buys in the service from outside. For the laundry, however, it is not possible in practice to set new requirements for their contractors within existing binding contracts. Therefore the requirement on external transport applies from the point at which a new contract is entered into with an external supplier.

P8 Transport – Nordic Swan Ecolabelled fuel

Points are scored for the use of Nordic Swan Ecolabelled fuel in line with Table 22.

Table 22 Nordic Swan Ecolabelled fuel

Percentage Nordic Swan Ecolabelled fuel	Points
Nordic Swan Ecolabelled fuel constitutes more than 15% of fuel consumption for distribution	3
Nordic Swan Ecolabelled fuel constitutes more than 10% of fuel consumption for distribution	2
Nordic Swan Ecolabelled fuel constitutes more than 5% of fuel consumption for distribution	1

State the type and amount of fuel used for transporting textiles.

Background to requirement P8

The point score requirement for the use of ecolabelled fuel encourages fuel with a high content of and stringent requirements on renewable raw materials and reduced climate emissions.

The requirement is unchanged compared with generation 3 of the criteria.

7.6 Textiles and mats

This section contains requirements that is related to textiles, mats and disposal.

O20 Code of Conduct

The business must have a Code of Conduct for purchasing textiles that ensures that the supplier and the textile producer respect and comply with the 10 principles of the UN Global Compact*.

Alternatively, the business' Code of Conduct may be based on the ILO's eight core conventions, which cover:

- A ban on child labour (Convention 138 on the minimum working age and Convention 182 prohibiting the worst forms of child labour)
- Freedom of association (Convention 87 on freedom of association and Convention 98 on the right to organise)
- A ban on discrimination (Convention 100 on equal remuneration and Convention 111 on discrimination in respect of employment and occupation)
- A ban on forced labour (Convention 29 prohibiting forced and penal labour and Convention 105 abolishing forced labour)

** The UN Global Compact is 10 principles that cover human rights, labour rights, the environment and anticorruption. Read more at <http://www.unglobalcompact.org/>*

If the licensee or the supplier breaches the business' Code of Conduct, the Nordic Swan Ecolabel licence can be revoked.

- Copy of the Code of Conduct in line with the requirement.
- Description of how the business' Code of Conduct is conveyed to the supplier and how the compliance of the supplier and the textile producer is checked.

Background to requirement O20

Industrial laundries tend to offer their customers textile hire, in other words it is the laundry that buys and owns a large proportion of the textiles handled at the laundry and used by its customers. As a large proportion of the textile production takes place in the Far East, labour conditions and similar ethical aspects are of major importance. Nordic Ecolabelling has therefore chosen to make a number of requirements on the laundries' purchasing of textiles. Focus is solely on the textiles that the laundry itself owns, as it is not steerable to impose requirements on the textiles that the laundry's customers buy.

The requirement concerns the business' purchasing policy when purchasing textiles. Here Nordic Ecolabelling wishes to reduce the risk of workers in the

textile industry in particularly in Third World countries suffering unfair working conditions. Therefore, Nordic Ecolabelling demands that businesses have a Code of Conduct in relation to purchasing textiles. The business' Code of Conduct must set requirements of the supplier of textiles and on the textile producer stating that the 10 principles of the UN Global Compact must be respected and complied with. Alternatively, it must be based on working conditions that are compatible with the ILO's eight core conventions.

The 10 principles of the UN Global Compact cover:

Human rights

- The business should support and respect protection of internationally declared human rights and
- Ensure that it does not contribute towards infringement of human rights

Labour rights

- The business should uphold freedom of association and effectively recognise the right to collective bargaining;
- Support the eradication of all forms of forced labour; and
- Support effective abolition of child labour; and
- Abolish discrimination regarding labour and employment conditions.

The environment

- The business should support a precautionary approach to environmental challenges;
- Take the initiative to promote greater environmental accountability; and
- Encourage the development and spread of eco-friendly technologies.

Anti-corruption

- Business should counteract all forms of corruption, including extortion and bribery.¹⁷

The ILO's eight core conventions cover:

- Prohibition of child labour (Conventions 138 and 182)
- Freedom of association (Conventions 87 and 98)
- Prohibition of discrimination (Conventions 100 and 111)
- Prohibition of forced labour (Conventions 29 and 105)¹⁸

The textile industry often comprises a complex network of different actors. Unfortunately, this means that steerability regarding compliance in this case is not high. However, it is possible to demand that the licensees take these issues seriously and the requirement sends a clear signal regarding the direction in which Nordic Ecolabelling would like to progress.

¹⁷ <http://www.unglobalcompact.org/>

¹⁸ <http://www.uniontounion.org/ilo>

For more information on Nordic Ecolabelling's attitudes to ethics in textile production, see the most recent background report on Nordic Swan Ecolabelling of textiles, hides/skins and leather.

The requirement is unchanged compared with generation 3 of the criteria.

O21 Purchasing sustainable textiles

A Nordic Swan Ecolabelled textile service must live up to the following requirements on an annual basis

$$\frac{(\text{amount}_{\text{ecolabelled}} \cdot 5) + \text{amount}_{\text{Oeko-Tex 100}}}{\text{amount}_{\text{workwear}} + \text{amount}_{\text{flat goods}}} \geq 85\%$$

where

$\text{amount}_{\text{ecolabelled}}$ is the purchased amount of all ecolabelled textile products

$\text{amount}_{\text{Oeko-Tex 100}}$ is the purchased amount of all non-ecolabelled textile products that meet the Oeko-Tex 100 standard

$\text{amount}_{\text{workwear}}$ is the purchased amount of workwear

$\text{amount}_{\text{flat goods}}$ is the purchased amount of flat goods that needs to be mangled (bed linen, tablecloths, cloth hand towel rolls, etc.)

Ecolabelled textiles means Nordic Swan Ecolabel, EU Ecolabel, Bra Miljöval (if both Class 1 and 2) and GOTS.

The calculation can be carried out either based on weight or by economic purchasing volume.

The requirement can be documented and complied with by a chain/group.

☒ Summary of purchased textiles with associated calculation showing that the requirement is fulfilled. The summary may be based on annual reports from the individual suppliers on their proportion of ecolabelled textiles and non-ecolabelled textiles that meet the Oeko-Tex standard. Nordic Ecolabelling will carry out spot checks on selected suppliers to confirm this data.

ℙ At the spot check, the supplier must be able to produce documentation for the report and a valid ecolabel certificate/documentation of compliance with the Oeko-Tex100 standard for the products that Nordic Ecolabelling selects for spot checks.

Background to requirement O21

This requirement concerns the environmental and health qualities of the textiles. There is a major difference in the availability of ecolabelled and health-labelled products on the market in different textile categories. Therefore the requirement relates to new purchases of workwear and flat goods that require mangling, as the proportion of products on the market that can document that they meet the ecolabel criteria or Oeko-Tex 100 is slightly higher. However, to provide a benefit from buying textiles that are eco- and health-friendly – also in other areas, all purchasing that meets the standards can be included in the calculation. The ecolabelling criteria are life cycle based and additionally contain the same type of health and quality requirements for the end product as Oeko-Tex 100, which is

why an ecolabel is more “valuable” than Oeko-Tex 100 and must therefore be weighted higher. The factor 5 is a subjectively defined factor.

Ecolabelled textiles means Nordic Swan Ecolabel, EU Ecolabel, Bra Miljöval (if both Class 1 and 2) and GOTS. The range of ecolabelled textiles has increased in the past few years, see the background to requirement P9 where activities with a high proportion of purchased ecolabelled textiles can score points.

As purchasing data is typically found in the businesses’ financial systems and is not always indicated by weight, the business may decide to perform the calculation either based on weight or financial purchasing volume. For textile service businesses with a shared purchasing department, the requirement on textile purchasing can be documented at business level.

The requirement has been tightened up from 75% to 85% compared with generation 3 of the criteria. Licensing data from generation 3 of the criteria shows that the Nordic Swan Ecolabelled laundries on average attain 98%. This high figure is partly explained by the fact that a few laundries have a high proportion of ecolabelled textiles. As ecolabelled textiles are weighted by factor 5 (in generation 3 of the criteria, the factor was 3), the result may be greater than 100%. On the basis of licensing data, the more stringent criterion means that approximately 30% of the laundries need to improve to continue to meet the requirement.

The laundries usually buy in thousands of different products every year and the requirement has been time-consuming to document and licence in former generations of the criteria. In this generation, the documentation requirement is therefore simplified. Instead of laundries having to gather and send in certificates for all articles, it can base its calculation on information from its suppliers. Nordic Ecolabelling then carries out spot checks on selected products at selected suppliers.

P9 Ecolabelled textiles

Points are awarded to laundries that buy in a large proportion of ecolabelled textiles in line with Table 23. The percentage of ecolabelled textiles is calculated using the formula

$$\frac{\text{amount}_{\text{ecolabelled}}}{\text{amount}_{\text{workwear}} + \text{amount}_{\text{flat goods}}} * 100$$

where

$\text{amount}_{\text{ecolabelled}}$ is the purchased amount of all ecolabelled textile products

$\text{amount}_{\text{workwear}}$ is the purchased amount of workwear

$\text{amount}_{\text{flat goods}}$ is the purchased amount of flat goods that needs to be mangled (bed linen, tablecloths, cloth hand towel rolls, etc.)

Ecolabelled textiles means Nordic Swan Ecolabel, EU Ecolabel, Bra Miljöval Class 1 and 2 and GOTS.

The calculation can be carried out either based on weight or by economic purchasing volume.

The requirement can be documented and complied with by a chain/group.

Table 23 Points for purchase of ecolabelled textiles

Proportion of ecolabelled textiles	Points
More than 50%	8
More than 40%	6
More than 30%	4
More than 20%	2
More than 10%	1

- Calculation showing the number of points scored in relation to Table 23.

Background to requirement P9

The number of licences for Nordic Swan Ecolabelling of textiles has increased in recent years, mainly Norwegian licences for flat goods. In May 2017 there were 22 Nordic Swan Ecolabel licences with 1,059 trade names. The equivalent figure for the EU Ecolabel was 17 licences med 271 trade names. The number of plants certified under GOTS has increased considerably in recent years, from 3,814 plants in 2015 to 4,642 plants in 2016 (GOTS, 2017). Textile services are described as an important actor in stimulating the ecolabelling of textiles. It is therefore of the utmost importance that the criteria for textile services continue to reward the purchase of ecolabelled textiles.

The four first points levels have been tightened up by 5-10 percentage points each compared with generation 3 of the criteria.

O22 Ban on phthalate plasticisers

Mats brought new must not contain phthalate plasticisers.

- Procedures that ensure that mats brought new do not contain phthalate plasticisers.
- Certificate from the supplier of mats that mats delivered to Nordic Ecolabelled laundries do not contain phthalate plasticisers.

Background to requirement O22

Phthalates are a group of substances that can be used to make plastics and rubber soft and flexible. As they are not chemically bonded in the plastic, they can leak out to the surrounding environment and be absorbed by the body. We absorb some phthalates through direct contact and others indirectly, e.g. through food.

Many phthalate compounds have undesirable effects on health and the environment. Some phthalates are on the EU's priority list of suspected endocrine disruptors requiring further evaluation, and some have already been found to be endocrine disruptors. Phthalates have also received huge amounts of media attention and can therefore be undesirable in ecolabelled products for many reasons. Five phthalates: bis (2-ethylhexyl)phthalate (DEHP), dibutyl phthalate (DBP), benzyl butyl phthalate (BBP), dimethoxyethyl phthalate (DMEP) and diisobutyl phthalate (DIBP) have problematic properties under the list of harmonised classifications (the CLP list). In addition, DEHP, DBP and

BBP are on the EU's priority list of suspected endocrine disruptors that require further investigation. (LOUS, 2009)

Some phthalate compounds are also on the Candidate list. These are: DEHP (bis (2-ethylhexyl)phthalate), DBP (dibutyl phthalate), BBP (benzyl butyl phthalate), DiBP (diisobutyl phthalate), DPP (dipentyl phthalate), PiPP (penta isophenyl phthalate), DiPP (diisopentyl phthalate), N-pentyl-isopentyl phthalate and bis(2-methoxyethyl) phthalate. All are there on the basis of being classified as reprotoxic.

Restrictions on the use of DEHP, DBP and BBP, DINP (di-isononyl phthalate), DIDP (di-isodecyl phthalate) and DNOP (di-n-octylphthalate) are regulated under REACH Annex XVII.

The mats used in textile services are standard mats and mats that are unique to customers (logo mats) with printing. Both types normally comprise a reverse side in nitrile rubber and a textile element either in cotton and/or synthetic yarn (polyamide or polyester). Nitrile rubber (Acrylonitrile Butadiene Rubber) normally has plasticisers added (Tranquilli, 2016). Nordic Ecolabelling has been in contact with the world-leading producers of mats during the revision. It has been found that some use phthalates as plasticisers in the rubber on the reverse of the mat while others do not. There is thus both relevance and potential for the requirement. Concerning the steerability conversations with purchasers show that mats that are unique to customers are bought new on an ongoing basis while standard mats are normally bought new before a high season.

The requirement is new compared with generation 3 of the criteria.

O23 Disposal

The laundry must report the weight of textiles and mats disposed of on an annual basis per category below. State which type of textiles and mats are usually disposed of in each category.

- Reuse
- Material recovery
- Energy recovery/incineration
- Landfill
- Other (specify)

The requirement refers to the textiles and mats that the laundry itself owns.

Reporting in line with the requirement.

P10 Disposal green initiatives

Points are given for measures/initiatives in the first three steps in the EU's waste hierarchy; preventive, reuse and material recovery, as below.

- Measures that prevent disposal arising score 1 point. A maximum of 2 points can be achieved. Examples of measures that score points are microchips in the textiles in a laundry category and repairing textiles and mats locally at the laundry. Other measures can be accepted as decided by Nordic Ecolabelling.
- If at least 50% of the textiles and mats disposed of go for reuse or material recovery in line with requirement O23, 3 points are scored.
- If at least 30% of the textiles disposed of go for reuse or material recovery in line with requirement O23, 3 points are scored.

The requirement can be documented and complied with by a chain/group.

- Description and justification of measures/initiatives as above.
- Reporting according to requirement O23.

Background to requirements O23 and P10

According to licence data from generation 3 of the criteria, the Nordic Swan Ecolabelled laundries together threw away approximately 7,500 tonnes of textiles in 2015. This is equivalent to an average approximately 0.5% of the amount of laundry on an annual basis. In this context, disposal means textiles being removed from production. Disposal can be divided into the following three categories depending on the reasons behind it.

1. Disposal due to textile quality, wear in the laundry process and wear during use of the textiles.
2. Disposal as a consequence of lack of care/incorrect handling of the textiles, or wear as a result of textiles being used for a purpose other than their original purpose.
3. Loss (textiles that are lost by the customer).

Manufacturing textiles, including raw ingredient production, produces a significant environmental burden, which means that initiatives relating to textiles and disposal can provide environmental benefits. The production chain for textiles is often a complicated one, making it difficult to know how great an environmental impact is involved in actual fact. However, a calculation of the carbon footprint of textile services shows that the distribution of greenhouse gas emissions between textile production, transport and use is 52%, 5% and 45% respectively (Grüttner, 2015). This shows how an extended lifetime for textiles reduces the relative environmental impact from textile production.

The laundries themselves are focused on reducing disposal partly because it is costly to buy new textiles. What Nordic Ecolabelling is able to contribute through a requirement on disposal is encouraging re-use/recovery – ensuring that the fibres are brought back into use again.

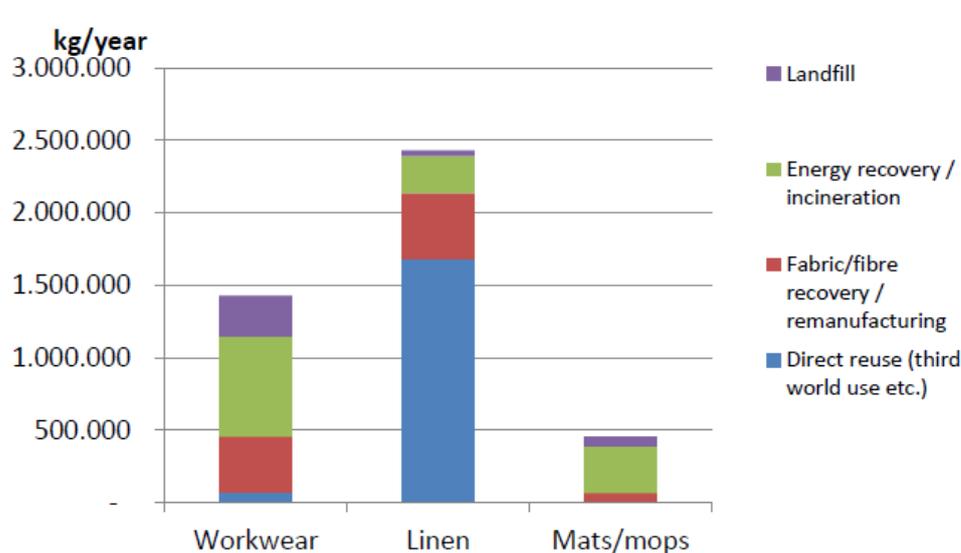
The European Textile Services Association, ETSA, has commissioned research to investigate what happens to textiles after disposal. Their members were asked to

report the amount of textiles they throw away based on how they are disposed of, see the categories below.

- Direct re-use
- Material recovery
- Energy recovery/incineration
- Landfill
- Other (loss etc.).

The survey showed what happened to approximately 4,500 tonnes of textiles divided into workwear, linen and mats/mops.

Figure 7 How workwear, linen and mats/mops are disposed of (Grüttner and Lilholt Sørensen, 2016)



Grüttner & Sørensen (2016) drew the following conclusions from the survey:

- The majority of workwear goes for energy recovery through incineration (48%) A smaller proportion is re-used or recycled (5% and 27% respectively)
- Regarding linen, the majority went for direct re-use or recycling (69% and 19% respectively).
- Looking at mats, the largest proportion were incinerated (70%), while only a small proportion were re-used (2%) or recycled (13%).

According to Thomas Hahn, a researcher at the Stockholm Resilience Centre, reporting to an ecolabelling body can help companies to identify their flows¹⁹. Requirement O23 does not contain a threshold value and is instead what is known as an information requirement in line with Thomas Hahn's model of increasing the visibility of flows. In generation 3 of the criteria, the laundry only needed to report the weight of the total amount of textiles disposed of. In this generation of the criteria, the laundry must report the number of kg disposed of based on how they are disposed of. In addition, mats are also now covered by the requirement.

¹⁹ Hahn, Thomas; Researcher at the Stockholm Resilience Centre. Ecolabelling Sweden AB's office, talk on 9 May 2016.

During the revision, Nordic Ecolabelling has been told of many good initiatives on the part of licensees to extend the lifetime of textiles. Everything from chipping mops and workwear in order to be able to charge customers for loss, selling/donating textiles to companies that sew clothes, bags, etc, to repairing textiles and mats on site. To encourage activities that extend the lifetime of textiles, Nordic Ecolabelling has introduced a point score requirement that rewards initiatives in the first three steps of the EU's waste hierarchy, see below.

1. Prevention
2. Reuse
3. Material recovery
4. Other recovery, e.g. energy recovery
5. Disposal

The order of priority in the waste hierarchy means that waste should preferably be prevented, secondly reused, thirdly sent for material recovery and so on. The order applies provided that it is environmentally justified and financially reasonable.

To serve as guidance but not to exercise control, a list has been drawn up on preventive measures with proposals that each score one point. If other initiatives are relevant, these must first be assessed by Nordic Ecolabelling before a decision is made regarding points. The requirement is new for this generation of the criteria.

7.7 Emissions and plastic waste

This section contains obligatory requirements for water discharges and plastic take-back and a point score requirement concerning textile production of synthetic textiles and emissions of microplastics in waste water.

O24 Water discharge

Water discharge from the laundry must comply with all requirements and conditions imposed by municipal and regional authorities. This covers conditions linked to permits or approval of running the business and orders and other decisions from environmental agencies concerned.

If more than 5% by weight of the laundry consists of industrial cloths, the waste water must be treated before it is discharged into the municipal drainage system. The sludge from the laundry's water treatment plant must be treated as environmentally hazardous waste and its treatment must be approved by the country's environmental authorities.

- Documentation to show that the plant meets any requirements from the authorities. Alternatively documentation to show that there are no requirements governing the laundry's discharge of waste water.
- Laundries that wash industrial cloths must state which laws/regulations apply and how these are complied with. Documentation of procedures for treating waste water before discharge into municipal drainage systems and handling of sludge.

Background to requirement O24

Requirements on discharges set by municipalities/authorities

Requirements on discharges are set by municipalities/authorities in all the Nordic countries. However, these requirements may vary widely depending on the municipality or the regional authority, production volumes, discharge volumes, what is laundered and the recipient. The requirements can be set in relation to pH, BOD/COD, temperature, oil, nitrogen, phosphorus etc. The laundries find it a challenge that these requirements are set in relation to concentration (mg/l) – instead of total emissions. This can penalise laundries that comply with the Nordic Swan Ecolabel's criteria on low water consumption (and thus have higher concentrations per litre of waste water) and energy consumption.

Waste water treatment

This varies depending on requirements set and production. The vast majority are connected to municipal treatment works. Some only have filtration of coarse particles, while newer facilities have tanks to provide more homogenous water to the waste water system. Regarding the pH requirement, oxygen can be added where necessary.

Can Nordic Ecolabelling sets requirements on treating waste water?

There is little to indicate that municipal water treatment works are not in a position to handle waste water from laundries so as to fulfil requirements set on emissions from water treatment plants. Internal water treatment plants are assumed to cost NOK 5–10 million. It would be difficult to set general Nordic Swan Ecolabel requirements due to major variation in local requirements and variation in production types and amounts.

The requirement therefore remains unchanged compared with generation 3 of the criteria.

P11 Information on textile production and reducing emissions of microplastics in waste water

Laundries that actively focus on microplastics by having their largest supplier of synthetic/mixed textiles answer questions on the synthetic materials included and their production – in line with Appendix 6: 3 points.

Laundries that have installed treatment technology that removes the majority of emissions of synthetic textile residues/microplastics in waste water: 5 points.

- Declaration from the supplier (Appendix 6).
- Confirmation from the supplier of the treatment system on installation and treatment effectiveness regarding synthetic residues/microplastics from laundering textiles.

Background to requirement P11

Several projects have drawn attention to problems concerning emissions of synthetic materials/microplastics when laundering textiles (Booth, 2016; Lassen, 2015 & Vermaire, 2017). However, researchers disagree on how high a proportion of the microplastics released when laundering synthetic textiles become caught in municipal water treatment plants (Bredsdorf, 2017). Applying the precautionary principle, it is important even at this early stage to make laundries, textile

suppliers and textile producers aware and encourage them to take an offensive stance in this regard. Nordic Ecolabelling therefore follows the recommendations of the EU-funded Mermaids project in relation to what should be evaluated in producing textiles, to minimise emissions of microplastics during laundry (see Appendix 6).

According to the EU-based Mermaids project, it is the synthetic materials acrylic, nylon and polyester that are the greatest contributors of microplastics. Every time a polyester fleece jacket is laundered, it releases approximately 1,000,000 fibres, an acrylic scarf 300,000 and a pair of nylon socks 136, 000. Mermaids project has identified different critical parameters that have a major impact on the release of plastic microfibrils in the laundry process. These parameters are summed up below (Mermaids, 2017).

- Fiber length: the shorter the fibers, the higher the probability to migrate to the yarn surface and increasing their hairiness and their pilling. As a consequence increasing their release during the laundry process.
- Yarn twist: the yarn resistance and elasticity increase with the twist. More compact yarns are achieved with higher twist values.
- Linear density (yarn count): The number of microfibrils released will increase with the yarn count due to a larger amount of fibers per cross section.
- Fabric density: a higher number of yarns per unit length will result in a tighter structure with lower probability to fiber release.
- Textile auxiliaries: provide physical protection of fibers against abrasion/reduction of coefficient of friction (fiber-fiber, fiber-detergent) during laundry.

Indications show that the way a yarn is designed has a big impact on the breaking/degrading of the yarn into smaller micro- and nanoparticles. Yarn producers and textile producers can use these parameters in their design to create yarn and textiles that release less microfiber during the washing process. Pre-sale washing also seems promising. Mermaids research showed that during the first wash significantly more microfibrils are released. A possible option is to carry out a first controlled washing of fabrics (capturing the microfibrils released during this first washing) before putting them on sale.

It is important that synthetic textile residues/microplastics are not only removed from the water but also do not end up in the sludge at municipal water treatment plants. This is because this sludge is often used as agricultural fertiliser. Research indicates that the soil to which sludge from water treatment plants is added can have up to 15 times more microplastic particles than untreated soil (Bredsdorff, 2017). Technology is available to clean the waste water from washing machines of textile fibres before they reach the drain (Hildonen, 2016). As well as information on textile production, laundries are also rewarded for limiting emissions of synthetic materials/microplastics in the waste water using water treatment.

Nordic Ecolabelling is continuing to examine how emissions of microplastics can be reduced in revising the criteria for Nordic Ecolabelling of textiles, hides/skins and leather.

The requirement is new for generation 4 of the criteria.

O25 Plastic take-back

The laundry must offer customers the opportunity to return plastic waste. The laundry must ensure that the plastic is sent for recirculation.

- Confirmation that the laundry offers customers the opportunity to return the laundry's plastic waste.
- Copy of the laundry's certificate of membership of a take-back system or other documentation of the take-back system in which the producer and/or importer is a member.

Background to requirement O25

To encourage a reduction in plastic packaging and to ensure re-use, the laundry must offer its customers the opportunity to bring back their plastic packaging and ensure that it is sent for recycling.

The requirement is unchanged compared with generation 3 of the criteria.

7.8 Quality control of laundries

This section contains requirements for quality control of laundries.

O26 Quality control

The laundry must fulfil and comply with the quality and health and safety requirements imposed by the national laundry association or the national quality body for laundries.

Alternatively the laundry can instead choose one of the following options:

- Fulfil the requirements of RAL GZ-992 (Professional Linen Care – Quality Assurance) except the requirements on sorting.
- Be certified in accordance with ISO 9001 (Quality management systems – Requirements) and EN 14065 (Textiles – Laundry processed textiles – Biocontamination control system) in which specific demands are made regarding bacteriological and visual purity.

Laundries in countries that do not have a national quality body can have quality control carried out by a quality body in one of the other Nordic countries.

- Copy of report on quality control carried out by an external and impartial inspector showing that the requirements are met.
- If relevant: Additional documentation for laundries that supply hospitals.

Background to requirement O26

To ensure reasonable quality and a sensible work environment over and above the requirements on chemicals at the laundry, laundries must as a minimum comply with the quality and health and safety requirements of industry associations. So as to not make the Nordic Swan Ecolabel exclusive to members of the national industry associations, Nordic Ecolabelling accepts as an alternative compliance with the German Standard RAL GZ-992 (Professional Linen Care – Quality Assurance) and a combination of certified under ISO 9001 (Quality management) and EN 14065 (Textiles – Laundry processed textiles – Biocontamination control system), which we have chosen to accept on an equal

footing, if at the same time the management system sets concrete targets for both bacteriological and visual purity.

Iceland lacks a national laundry organisation or quality control. Icelandic laundries can therefore have quality control carried out by a quality body in one of the other Nordic countries.

The requirement is unchanged compared with generation 3 of the criteria.

7.9 Working conditions

This chapter contains requirements on working conditions for own employees and contractors/employment agencies.

O27 Working conditions

The laundry's own employees must be guaranteed pay (including special services), working hours and other working conditions that are not less favourable than those agreed by the labour market partners for equivalent work in the sector concerned. Such conditions are often agreed through a collective agreement entered into by the representative labour market partners in the country in question and apply to the sector in the whole country (natural geographical sphere of influence for employees in the country).

- Documentation of membership of an employers' organisation, copy of an agreement with a union or a copy of an agreement between the applicant and employees relating to the requirement.

O28 Contractors/recruitment companies

Contractors/recruitment companies who provide labour must fulfil the following requirements:

- The work must be carried out by the contractor's own staff. The contractor cannot hire another sub-contractor.
- The contractor must be registered for VAT and employer payments and (in Finland) be registered for preliminary taxation – "förskottsuppbörd/ennakkoperintä".
- The business must not owe tax or charges or be in arrears.
- The laundry's own employees must be guaranteed pay (including special services), working hours and other working conditions that are not less favourable than those agreed by the labour market partners for equivalent work in the sector concerned. Such conditions are often agreed through a collective agreement entered into by the representative labour market partners in the country in question and apply to the sector in the whole country (natural geographical sphere of influence for employees in the country).

- Confirmation that the work is only carried out by the sub-contractor's staff.
- Copy of documentation from the tax authorities confirming VAT and employer registration.
- Copy of documentation from the tax authorities confirming that no tax or charges are owed.

- ☒ Documentation of membership of an employers' organisation, copy of an agreement with a union or a copy of an agreement between the applicant and employees relating to the requirement.

Background to requirements O27 and O28

In sectors with small margins, limited education requirements and low pay, it is important to ensure that both the companies and their employees are competing and working on equal terms. Therefore a requirement on working conditions has been introduced for both in-house and external employees.

The situation appears to be in good order in most of the Nordic laundry industry. The industry is regulated by regulations and tariff agreements. The use of temporary staff is also regulated on paper, also where there is no explicit agreement. In Norway, recruitment agencies used must be on an approved list drawn up by Arbeidstilsynet. In Denmark the use of temporary cover is regulated by separate legislation. That said, the Norwegian union Industri Energi points out that despite improvements in recent years, far too much hired labour is still used. An example from Økokrim (the Norwegian police investigation of economic crime) shows a laundry that had hired in its entire workforce and saved NOK 5–6 million a year. The union takes a very positive view of efforts on the part of Nordic Ecolabelling regarding well-regulated working conditions. This will:

- eradicate actors that do not take their responsibilities seriously from the market
- combat crime
- be an advantage for the Nordic Swan Ecolabel brand in ensuring a connection with serious operators.²⁰

This is also supported by a series of newspaper articles in Dagsavisen (Fladberg, K, L., 2016, Fyen, S., 2016 and Fyen, S., 2016).

The Danish union 3F also emphasises the importance of monitoring developments in the labour market – for example the use of “enterprice” (hiring firms that have responsibility for parts of operation). But all in all the view is that working conditions in Danish laundries are good.²¹

A new EU report concludes that Norway and many other countries within the EU have wide-ranging problems with the use of hired-in labour and contractors. The EU body Eurofound bases the new report on input from researchers in EU member states, as well as Norway. The report shows that illegal hiring of labour and the use of contractors remains an extensive problem area, despite several different initiatives to limit this (Eurofound, 2016).

The consequences of this often involve social dumping and distortion of competition based on worse pay and working conditions for employees of contractors and from recruitment companies, compared with local Norwegian workers, for example.

The report evaluates different aspects of the labour market where there is a particular risk of breaking the law and social dumping, including:

²⁰ Dyrkorn, Charlotte; union secretary, Industri Energi. E-mail contact 17 June 2016

²¹ Petersen, Tine; negotiation secretary, 3F Transportgruppen. Phone conversation 17 June 2016.

- Contractors
- Freelancers
- Recruitment agencies
- Temporary labour
- “Fictitious stationing abroad”

The requirements are new for generation 4 of the criteria.

7.10 Environmental management and regulatory requirements

To ensure that the Nordic Ecolabelling requirements are met, a documented management system must be in place, and it must include the following implemented procedures.

If the laundry has a quality system that is certified to ISO 9001, or an environmental management system certified under ISO 14 001 or EMAS, and the following procedures are applied, it is sufficient for the certification body’s auditor to certify compliance with the requirements.

O29 Organisation and responsibility

An organisational chart must be drawn up. Responsibility and authority for central environmental functions must be defined. The company shall appoint individuals who are responsible for ensuring the fulfilment of the Nordic Ecolabelling requirements, for marketing and for finance, as well as a contact person for communications with Nordic Ecolabelling.

Copy of organisational chart.

O30 Documentation

The licensee must archive the documentation that is sent in with the application. All the documents regarding the licence must be easily available on the premises of the licensee. This includes documents on internal checks and measurement reports, for example. The contact person for communication with Nordic Ecolabelling is responsible for ensuring that the documentation is updated and available.

Checked on site as necessary.

O31 Purchasing

Procedures ensuring that environmental requirements will be fulfilled when purchasing goods and services shall exist.

- Concrete, daily purchasing procedures shall detail first-choice options and prohibited alternatives. If it is necessary to deviate from this procedure, a purchasing manager shall decide on the matter.
- General principles shall exist for goods and services that are purchased infrequently. A purchasing manager shall decide on environmental matters regarding such goods and services.

Copy of all procedures for purchasing.

O32 Changes and nonconformities

Nordic Ecolabelling must be informed of/approve planned changes in products and markets that have a bearing on the Nordic Ecolabelling requirements. Unplanned nonconformities that have a bearing on Nordic Ecolabelling requirements must be reported to Nordic Ecolabelling in writing and journalled.

- Copy of the procedure for changes and unplanned nonconformities.

O33 Training

All employees and contractors that are part of daily operations must have the know-how to ensure fulfilment of the Nordic Ecolabelling requirements.

Employees must receive regular training in general environmental matters and in particular specific to their field of work.

Participation in training shall be documented. Contractors shall participate in the laundry's training or certify that they have received equivalent training.

- Copy of the procedure for training of employees and contractors.

O34 Customer information

Customers must be informed that they are using a Nordic Swan Ecolabelled laundry and what this means.

- Copy of the customer information procedure.

O35 Legislation and regulations

The business must ensure compliance with the applicable legislation regarding the working environment, the external environment, finances, hygiene and health. The business must not have any form of negative criticism from an authority or agency which has not been rectified within the deadline set by the supervisory authority or agency. If this requirement is not met, Nordic Ecolabelling may revoke the licence.

- Duly signed application form.

O36 Annual follow-up

The laundry must ensure that the criteria in the requirements are met on an ongoing basis. At least once a year (within 6 months of closing the books) a review of operations shall be made.

Nordic Ecolabelling may request reports from the internal audit and inspect a selection of requirements or all of them. The laundry will be notified of the inspection in advance.

- Licence follow-up procedure.

7.11 Summary of points

O37 Obligatory requirement re. points scored

The laundry must score at least 20 points.

The table below summarises the point score requirements and how many points can be earned for each requirement.

Table 24 **Points total**

Point score requirements	Points achieved	Maximum number of points
P1 Dry cleaning		2
P2 Energy		10
P3 Greenhouse gas emissions		10
P4 Water consumption		5
P5 CDV values		5
P6 Low consumption of chlorine		10
P7 Ecolabelled laundry detergents		8
P8 Transport – ecolabelled fuel		3
P9 Ecolabelled textiles		8
P10 Disposal green initiatives		5
P11 Information on textile production and reducing discharges of microplastics in waste water		8
Total		74

☒ Summary of points in line with the table above.

Background to requirement O37

To ensure the greatest possible potential for product development and innovation and thus usability of the criteria, combined with a low environmental impact overall, a points system has been created. This means that if a laundry is ahead in one area, it can perform less well in other areas as long as the laundry has a low environmental impact overall.

On top of the obligatory requirements, the laundry must score at least a total of 20 points in the point score requirements. This can be attained through considerably lower consumption of energy, water or chemicals – or by putting initiatives in place in other areas as set out above.

The total points requirement is an important requirement as it is a requirement that most clearly distinguishes between laundries on the market with the best environmental performance from the rest. Nordic Ecolabelling judges that there is great potential for improvement as there is a very wide spread of environmental performance and as the industry is developing rapidly.

In generation 3, the average points total for Nordic Ecolabelled laundries was 24 points, and this was felt to be grounds to tighten up the criteria. The percentage number of points that must be earned has therefore been raised from 23% to 27%.

Compared with generation 3, it has become more difficult to attain this proportion of points as the basis for allocating points – the obligatory requirements – has been tightened up in several areas (including energy, greenhouse gases and CDV).

8 Areas without requirements

As stated in the section on development of the market in Chapter 2, actors in textile services geared towards consumers have established themselves on the market. This concerns B2C (business-to-consumer) services in which private individuals can have their clothes washed by professional laundries. So far, B2C services account of only a small proportion of the market, but are expected to grow as consumer behaviours such as “outsourcing”, “on demand” and “home delivery” become increasingly common. Within one of the sub-objectives of this revision, the project group has attempted to answer the question of what a shift from laundry in the home to laundry by professional laundries means in terms of chemicals consumption and transport. The aim here is to find out whether special requirements should be developed on chemicals and transport.

The project group has reached the conclusion that special requirements in these areas are not necessary. Regarding chemicals, tough and far-reaching requirements are imposed on all laundry chemicals used in a Nordic Swan Ecolabelled laundry. The substances that are prohibited in the criteria for consumer laundry detergents but not in the chemicals requirements for textile services are listed below.

- Antimicrobial or disinfectant substances added for a purpose other than preservation
- DTPA diethylenetriamine pentaacetate
- Chlorine-based bleaching agents

On the other hand, considerably more textiles are washed per gramme of laundry detergent in a laundry. Regarding use of chlorine, this is limited by a separate requirement in textile services. The factor value for the textile category private clothing is low.

Laundering private clothing at professional laundries involves transport that would not otherwise have taken place. This can be compared with cleaning assistance in the home, for which Nordic Ecolabelling has criteria. Transport to private individuals is covered by the same requirements as transport to hospitals, hotels, etc. Energy consumption per kg textiles can, however, be expected to be lower at a laundry compared with laundry in the home. This means that energy consumption is lower at other parts of the life cycle when laundering is carried out at a laundry.

Nordic Ecolabelling will monitor the development of the B2C market in the years ahead. The relevance of additional requirements may increase as the service grows.

In previous generations of the criteria, Nordic Ecolabelling has set an information requirement in which the amount and type of fuel and the number of kilometres driven on an annual basis must be stated. The purpose of this requirement was primarily to gather data in order to set a threshold value requirement in the next revision. The most recent evaluation of the criteria concluded that it is not possible to set such a quantitative requirement. This is partly because each laundry is unique in terms of the composition of the size and the type of customer and thus differing needs for large lorries in relation to smaller goods vehicles. Similarly, the distance between customers can be

significant, e.g. between a laundry in a densely populated area near one of the Nordic capitals and another laundry in a sparsely populated area.

It is true that reporting to an ecolabelling body can help companies to identify their flows. However, Nordic Ecolabelling judges that the licensees are focused on optimising their transport regardless.

In this criteria generation, the requirement that limits the amount of phosphorus (P) has been removed. In return, phosphates have been listed on the list of substances that can not be included in the laundry chemicals, see requirement O16. The reason why Nordic Ecolabelling has not introduced a ban on phosphorus as a whole is that phosphonates are highly relevant for stabilizing hydrogen peroxide and peracetic acid and thus a prerequisite for modern low-temperature washing with chemical-thermal disinfection. With the ban on phosphates, Nordic Ecolabelling ensures a low use of phosphorus (P), as contributions from P-sources other than phosphates are estimated to be very small in this context.

9 Changes compared to previous generation

The table below lists changes compared with the previous generation of the criteria.

Table 25 Overview of changes to criteria for textile services generation 4 compared with previous generation 3.

Proposed requirement generation 4	Requirement generation 3	Same requirement	Change	New requirement	Comment
O1	O1	X			
O2	O2	X			Requirement text simplified
O3	O3	X			
O4	O4	X			
P1	P1	X			
O5	O5		X		Requirement tightened up.
O6	O6		X		Requirement tightened up.
P2	P2		X		Requirement tightened up in line with O6.
O7	O7		X		
P3	P3		X		Requirement tightened up in line with O7.
O8	O8	X			
P4	P4	X			
O9	O10		X		Requirement updated in relation to the CLP Regulation 1272/2008. Hazard statement H304 is included (with exceptions).
O10	O11		X		Requirement updated in relation to the CLP Regulation 1272/2008.
O11	O12	X			No changes, only updating.
O12	O13		X		Requirement tightened up.
P5	P7		X		Requirement tightened up in line with O12.
O13	O14	X			
P6	P8		X		Requirement tightened up.

O14	O16	X			
O15	O17	X			
O16	O18		X		Requirement tightened up with regard to phosphates.
O17	O19			X	
O18	P9		X		The requirement has been tightened up such that fewer points are scored per points level.
P7	O9	X			It has been made clear that the requirements apply whether or not the textile service uses its own drivers/vehicles or whether the service is bought in from outside.
O19	O9		X		The requirement has been tightened up and it applies whether or not the textile service uses its own drivers/vehicles or whether the service is bought in from outside.
O20	P6	X			
P8	O21	X			
O21	O20		X		The requirement has been tightened up. Ecolabelled textiles are weighted with a higher factor. The documentation requirement has been simplified.
O22	P10		X		Requirement tightened up.
P9	-			X	
O23	O22		X		Requirement tightened up.
O24	-			X	
P10	O23	X			
O25	-			X	
P11	O25	X			
O26	O27	X			
O27	-			X	
O28	-			X	
O29	O31	X			
O30	O35	X			
O31	O34	X			
O32	O32	X			
O33	O33	X			
O34	-			X	
O35	O29	X			
O36	O37	X			
O37	O28		X		

The evaluation of generation 3 of the criteria showed that requirements O15 Restriction on the phosphorus content of laundry chemicals, O19 Dyes , O24 Production waste and recycling systems, O26 Delivery of laundry chemicals and O30 Environmental policy can be removed due to low RPS. These requirements are therefore not included in this generation of the criteria.

History of the criteria

Nordic Ecolabelling adopted version 4.0 of the criteria for textile services on 14 March 2018. The criteria are valid until 31 March 2023.

New criteria

Points will be added on the areas that it may be relevant to focus on in the future after the review.

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