Consultation summary

Consultation period: 18 September—20 October 2025

Consultation respondents: 14

Stakeholder sectors (noting some respondents spanned multiple sectors)

Sector	% of total respondents	# of respondents
Government	6.7%	1
Not-for-profit	13.3%	2
Academic	13.3%	2
Commercial - raw material supplier	13.3%	2
Commercial - product manufacturer/supplier	26.7%	4
Consultant/Technical expert	33.3%	5
Industry body (overseas)	20.0%	3

GENERAL COMMENTS		
Consultation comment (9 commenters)	**Type of comment**	**Response/Action taken**
The current draft version of the Standard document is elaborate, well framed with well thought out sections and explanations. It is technically and scientifically sound and also includes a range of aspects relating to sustainability. It is nice to see the sustainability aspects to it. Overall, it is a great effort by you and your team	General (commendation)	None required
We would first like to acknowledge and commend Accord's significant work in developing and updating the Recognised Standard. This initiative represents a valuable opportunity for our industry to align with a robust, science-based framework that promotes the certification of environmentally preferable products in the commercial and industrial cleaning and hygiene sectors. The comprehensiveness of the revised Standard clearly reflects a deep technical understanding and a strong commitment to sustainability. After reviewing the revised document, we find the approach taken to address the different topics and technical aspects very appropriate — from product claims and supporting evidence to concentration requirements, restricted substances (aligned with GHS), fragrances (aligned with IFRA), and microorganisms.	General (commendation)	None required
I believe these changes make sense in the grand scheme.	General (commendation)	None required
X supports the draft, as the overall concept of the "Recognized" Ecolabel standard is well aligned with other existing ecolabeling standards.	General (commendation)	None required
I believe overall, this is a very well thought out and strong Standard Criteria. My comments are minor food for thought items, primarily referencing what we know through the Safer Choice Program Standards, which you've referenced as well.	General (commendation)	None required – specific comments are made elsewhere
We applaud Accord's commitment to promoting environmentally sustainable practices and providing its members with the knowledge and tools to meet regulatory obligations relating to industrial chemicals.	General (commendation)	None required
Provides a comprehensive and sound basis to support environmental claims	General (commendation)	None required
The 2025 Recognised Standard Criteria is technically robust and methodologically sound, providing a credible ecolabel platform tailored to commercial and I&I cleaning products. The 2025 revision represents a marked advancement in both scope and detail. Key strengths include: • Comprehensiveness and scientific depth: The integration of detailed environmental, health, and social criteria provides strong alignment with ESG expectations and sustainable procurement trends.	General (commendation) + Governance suggestions	None required – governance suggestions are elaborated in relation to Section 4

• Transparency of rationale: Each criterion is supported by a clear rationale, demonstrating methodological soundness and traceability to authoritative references (OECD, EPA, ISO). • Lifecycle and systems focus: The addition of whole-of-business criteria embeds continuous improvement and aligns the ecolabel with international best practice. • Consistency with ISO 14020/14024: The document shows maturity as an ISO Type I ecolabel, offering credible third-party verification. These foundations provide a solid basis for greater external recognition and potential endorsement by government and institutional buyers. The 2025 Recognised Standard Criteria is technically robust and methodologically sound, providing a credible ecolabel platform tailored to commercial and I&I cleaning products. However, greater formalisation of governance, transparency, and engagement processes would strengthen the scheme's public legitimacy and stakeholder confidence. By embedding independent oversight, digital accessibility, and continuous feedback loops, Accord can position Recognised as a national benchmark in sustainable product certification.		
As a medium-sized manufacturer of commercial cleaning chemicals with approximately 50 employees, we welcome the ambition of the Recognised Standard to drive sustainability leadership across our industry. We strongly support the intent of the standard and appreciate the opportunity to provide feedback during this consultation phase.From the perspective of a Small to Medium Enterprise (SME), we encourage the Recognised program to consider proportional and flexible pathways that will enable broader uptake across the sector. We believe that proportionality is critical. By ensuring SMEs can realistically comply, the Recognised Standard will achieve greater market penetration, stronger industry credibility, and a faster transition toward sustainable cleaning products. Thank you for considering these recommendations and look forward to continued engagement.	General (commendation and recommendation)	The views of SMEs were heard through the participation of four SME representatives on the Recognised TWG that revised the Standard. We are confident that the Standard is achievable for SMEs as well as larger companies, based on their input. The consultant participant was also contacted with more information about the process, to emphasise that the Whole-of-business requirements are assessed every 6 years, not every time a product is assessed.
Well rounded comprehensive standard addressing the relevant topics for product certification.	General (commendation)	

6.1.1 Product performance (3 commenters)		
Consultation comment	**Type of comment**	**Response/Action taken**
Re 'determined by market acceptance'. this is very grey area type statement and could lead to levels of interpretation. could just be my reading of it though.	Editorial/Technical	1. Sentence 2 was removed, as it sounds like a requirement: 'Products must be fit for purpose, i.e., satisfying consumer performance needs. ~~Fit for purpose is primarily determined by market acceptance.~~ Specific evidence is needed in any of the following cases…' 2. No changes to performance testing, at this stage. It is an investment to put a product through the Recognised assessment and licensing process, and we are confident producers would not do so without certainty about their product's performance. The Recognised TWG discussed this and agreed that requiring evidence of specific claims was an appropriate approach. Product performance testing could be considered again in the next review of the Recognised standard. The Rationale was modified as below to make this clearer: *All businesses supplying products to the Australian market have legal obligations under Australian Consumer Law (ACL). This specifies that products must be fit for their advertised purpose and that product descriptions must be accurate. Other jurisdictions have similar provisions. These legal requirements, the effectiveness of the highly competitive commercial/I&I market in determining product performance, and the investment involved in putting a product through the Recognised assessment and licensing process give confidence that any further demonstrations of product performance are unnecessary. However, evidence is required to verify any specific performance claims and, for leave-on products, to ensure product residue safety.*
Agreed that products must be fit for purpose, as well as the need for evidence in the case of specific claims. "Fit for purpose is determined by market acceptance." Market acceptance may need further clarification.	Editorial	
We propose that product performance for laundry detergent and ADW is tested according to recognised standards e.g. https://www.hohenstein.com/en/expertise/performance/testing-of-detergents/ If only compared with existing products consumers may experience that the ecolabelled product does not perform as well as other products and could loose confidence with the certified products.	Technical - requirement	

6.1.2 Product ingredient and hazard disclosure (4 commenters)		
Consultation comment	**Type of comment**	**Response/Action taken**
Quite often SDS documentation is supplied from blends and therefore sometimes cannot get single ingredient SDS documents? what happens in cases like this? With many detergent type of products have ingredients that are generated in the manufacturing process and therefore do not have an SDS, what would be the process for these?	Technical – evidence/assessment	No change. A single SDS is required for each ingredient in the product, regardless of whether that ingredient is a single chemical or a proprietary mixture/blend purchased from a supplier. For example, if an application is made for a product called Clean All, and this contains a number of ingredients including a surfactant Sudsy (a surfactant blend- containing 3 constituents - 1, 2, and 3), separate SDSs are not required for the individual chemicals within the Sudsy blend (i.e., constituents 1, 2, and 3), provided the SDS for Sudsy adequately conveys all necessary hazard information for the mixture as a whole.
Re 'Required evidence/supporting information, List of ingredients': Chemical and trade names, their function	Editorial	Change evidence requirement to: 'List of ingredients, including CAS number, chemical/trade name, function and proportion in the formulation, to a total of 100%'.
No issues. Agreed that ingredient evaluation is necessary for evaluation. Appreciate that this done through third-party assessor to ensure confidentiality.	General comment	None needed
List of ingredients to consider purity of the ingredient. Declare total active in %w/w and total ingredient additions in %w/w.	Technical – evidence	No change. This would be ideal, but this request may be onerous for the applicant, i.e., to get this information from the supplier. By providing a current SDS for each ingredient, the concentration of any hazardous constituents can be confirmed (i.e. a legal requirement to identify these on the SDS).

6.2.1 Product concentration (4 commenters)		
Consultation comment	**Type of comment**	**Response/Action taken**
Re 'minimum dilutions', is there a reference from where these figures were taken? Are there any safety requirements and/ or functional efficacy for which the minimum dilution is chosen?.	Question seeking clarification	The minimum dilutions are achievable whilst ensuring significant benefits in terms of packaging and transport energy/emissions. The concentrate is formulated to permit this degree of dilution whilst preserving efficacy. Safety is dealt with by regulations and other criteria within this Standard.
The minimum dilution for floor and carpet cleaners can be very different. 1:60 could be a very restrictive ratio for carpet cleaners. For example, Green Seal's GS-37 (for General Purpose, Restroom, Glass, and Carpet Cleaning Products used in I&I settings) standard sets the minimum dilution ratio for carpet cleaners at 1:16.	Technical - requirement	Agreed. The requirement was split into two sections: Hard floor cleaners – 1:50 Carpet and upholstery – 1:16
We support the preference for concentrates but note that certain ready-to-use formats are required by customers for safety-critical applications. Recommendation: Expand exemptions for RTU products where concentrates are impractical (e.g., infection control, specialised cleaning contexts).	Technical - requirement	Additional clarification was sought from the consultation participant, identifying the following categories: · Infection control and outbreak management: Hospital-grade disinfectants, surface sanitisers, and hand hygiene products that must be supplied pre-diluted to ensure correct concentration, stability, and efficacy, particularly where on-site dilution poses contamination or safety risks. · Specialised cleaning for sensitive environments: Products used in healthcare, food processing, or aged-care settings where consistent, validated application strength is critical (e.g., pre-diluted surface disinfectant sprays, instrument wipes). · Small-scale or mobile cleaning operations: Field technicians, transport sanitation teams, or contractors who lack access to controlled dilution systems and require ready-to-use products for compliance and efficiency. · High-risk chemical formulations: Products where incorrect dilution could reduce performance or create hazards (e.g., corrosive cleaners, oxidising sanitisers, or products with strict pH ranges for antimicrobial activity). · Closed packaging or single-use delivery systems: RTU spray bottles designed to prevent contamination and ensure hygiene in repeated-use environments The TWG discussed whether any of these exemptions should be added. For some, the delivery approach would seem to go against environmental principles, e.g., single-use delivery. For others, the argument of 'it might not be diluted correctly' should be minimised by clear information, education,

		tools, etc., provided by the product supplier. It was also noted that RTU products would still need to pass the VOC criteria, which would be very challenging. Additional specific categories were not added but the following clause was added, enabling Third-party Assessor discretion in specific cases: 'Specific cases for which there is a clear performance, safety, technical or practical reason preventing dilution will be considered on a case-by-case basis.' Accompanied by evidence requirement: 'For products not covered by an exempt category, that are not supplied in concentrated form, evidence for why supplying as a concentrate is not possible for product performance, safety, technical or practical reasons, must be supplied.'
My eye was caught be the volume measurement of laundry detergents but my remark applies to other materials in this category, all of which are treated as liquids but I know (from my experience with laundry detergents and disinfectants like solid hypochlorite) that solids are available, too. Solids are mentioned in the next section (required evidence).	Technical - clarification	The text was amended to make it clearer that no minimum dilution requirements apply to solids, with additional explanation in the Rationale, as follows: 'In general, ready-to-use liquid products are not eligible for licencing under this ecolabel program unless there is a clear technical reason preventing dilution. Incidental use of the liquid product concentrate, for example, for special applications such as hard-to-remove soils or stains, is permitted if this is stated on the product label or in the manufacturer's instructions.' *'Exempted categories are based on the significant adverse effect on product hygiene performance, stability or customer safety arising from dilution upon use, as described below. In addition to these exempted categories, no concentration requirements/minimum dilution ratios are specified for solid products, as these are already formulated without water and therefore have much lower packaging requirements and transport impacts.'*

6.2.2 Aquatic toxicity, persistence and bioaccumulation (8 commenters)		
Consultation comment	**Type of comment**	**Response/Action taken**
Much of your methodology aligns with the US EPA's Safer Choice Program and as a result can be inconsistent with Australia's regulatory frameworks. For example, the US hazard thresholds sometimes differ to those outlined in the Australian Environmental Criteria for persistent, bioaccumulative and/or toxic chemicals. This is not necessarily a concern if the US thresholds are more restrictive but for some chemicals, Recognised accreditation may not align with scheduling outcomes under the Industrial Chemicals Environmental Management Standard (IChEMS).	General	None needed – specific comments addressed as below
We appreciate the reference to the EPA's Safer Choice Program.	General	None needed
The review of toxicity, persistence and bioaccumulation is an excellent step forward and aligns with the direction in which environmental regulation is evolving globally.	General (commendation)	None needed
Page 18, Table 1, Title 'Environmental toxicity and fate (persistence and bioaccumulation) criteria' A consideration of microbial inhibition may be important for chemicals used in products that are expected to go to STP. For example, some consideration of OECD TG 209 data to ensure STP health is maintained. Further reading: https://www.nepc.gov.au/sites/default/files/2022-09/cmgt-nchem-eragm-industrial-chemicals-200902.pdf - Section 5.3 https://echa.europa.eu/documents/10162/17224/information_requirements_r7b_en.pdf/1a551efc-bd6a-4d1f-b719-16e0d3a01919 - section R.7.8.16	Technical	No change. Agree with the core concern regarding microbial inhibition at the STP; however, do not believe additional criteria are required as this is addressed as part of the existing assessment framework for the following key reasons: *Acute Toxicity and Biodegradability Assessment* Chemicals flagged as acutely toxic to aquatic life (e.g., LC50 ≤ 1 mg/l in fish or algae) will face greater scrutiny, and the mechanisms causing aquatic toxicity will often overlap with those causing microbial inhibition. *Biodegradability* The Ready Biodegradation tests (OECD 301 series) intrinsically assess microbial health, as high toxicity will prevent the test from reaching the pass criteria. *Product dilution*, as noted in footnote 14 to Table 1, means that most products are significantly diluted for use and before entering the sewage system, which will reduce the concentration of any inhibitory components. Furthermore, the significant dilution that occurs when residential sewage enters the large-volume treatment plant typically renders acute inhibition effects negligible.
Page 18, Table 1, Persistence > 100 mgL. '…half-life': Could amend to primary half-life for clarity.	Editorial	No change – retain consistency with the US EPA and IChEMS wording. Understand the suggestion that including the word 'primary' may clarify that we are focusing on the parent compound. But as the Recognised

		criteria state that ...*the component need not meet the 28-day pass level... if there are no degradation products of concern and half-life is <60 days*...the word *primary* is implied in this context as is specifically relates to the fate of the component (parent compound) before considering its breakdown products, i.e. it is the disappearance time of the parent compound that is being measured. Looking at IChEMS criteria, the word primary is not used, but again it is implied as it states that *For the purposes of the Australian Environmental Criteria for Persistent, Bioaccumulative and/or Toxic Chemicals, half-life (T½), is the time taken for half of a substance to degrade or transform in the specified compartment, measured in days or months.*
Page 18, Table 1, Persistence > 100 mgL. Could specify compartment for clarity, e.g. <60 days in surface waters.	Editorial	Agreed. To be consistent with IChEMS, include a statement noting that water will be the primary environmental medium of relevance to the fate of these products (i.e., down-the-drain chemicals). Text was changed to '…then the component need not meet the 28-day pass level as measured in a ready biodegradation test if there are no degradation products of concern and half-life is <60 days in water…' This can be done while retaining the specific provision (note 7) that permits consideration of other supporting data, recognising that the environment is a highly complex system.
Page 18, Table 1, Bioaccumulation potential. Noting your inclusion OECD test guidelines for BCF/BAF determinations in the annex, we suggest you provide an indication of rationale, e.g. log kow or BCF/BAF/BMF threshold.	Editorial	Agreed. IChEMS provides the following thresholds: BAF ≥ 2000 or BCF ≥ 2000 or log Kow ≥ 4.2 (if BAF and BCF are not available). These thresholds are applied in the third-party assessment but are not explicitly stated in the criteria. Last specific footnote changed to 'Bioaccumulation potential is indicated when BAF ≥ 2000 or BCF ≥ 2000, or log K_{ow} ≥ 4.2 (if BAF and BCF are not available). Consideration of bioaccumulation potential is not required for surfactants due to the difficulty in measuring the ~~octanol/water partition coefficient (~~K_{ow}~~)~~ for these components, which sit at the octanol/water interface.'
Page 19, Table 1, specific note 1. Suggest rewording for consistency with the original US EPA source: '... and because the relationship between acute toxicity and chronic toxicity is generally predictable.' The 'generally' does a lot of heavy lifting here. The acute-chronic ratio	Editorial	Agreed. Specific note 1 was amended to 'Acute toxicity data is specified, as this data is often more readily available than chronic toxicity data, and because a predictive relationship between acute toxicity and chronic toxicity is generally observed across broad data sets for organic chemicals[5].

is not a constant for every species. Rather, it is a trend when you plot the data of many species.		Where experimental chronic toxicity data is available (whether primary or published – see 'Hierarchy of data preferability' under Required evidence/supporting information on page X), it will be assessed with other data and applied based on the relationship between acute and chronic aquatic toxicity of organic chemicals.' (footnote 5 states 'See footnote 6 to Table 12 of the following link: www.epa.gov/sites/production/files/2013-12/documents/dfe_master_criteria_safer_ingredients_v2_1.pdf.'
Page 19, Table 1, specific note 1. Suggest that chronic toxicity data should also be considered if available.	Editorial	
Re 'Note 1', suggested addition in [ ]: Acute toxicity data is specified as this data is often more readily available than chronic toxicity data, and because there is a predictable relationship between acute and chronic toxicity [of organic chemicals]	Editorial	
Revise 'Acute toxicity data is required for algae, aquatic invertebrates and freshwater fish. The lowest value (highest toxicity) is used for evaluation.' to 'Acute toxicity data is required for algae, aquatic invertebrates and freshwater fish, experimental test data are preferred. Publication and modelled data may be used along with data from a suitable analog(s). The lowest value (highest toxicity) is used for evaluation.' Rationale: The chemical used in I&I cleaning can also be used in household application, where the animal testing is concerned there. And the fish is regarded as "animal" in some certification program, e.g. Cruelty Free International (CFI). In order to avoid a misunderstanding that the experimental test data of fish is mandatory, suggest referring to the wording of EPA safe choice guidance to state other modelling data can also be accepted. Original statement from US EPA: "Acute aquatic toxicity: Measured data are preferred. ECOSAR estimations may be used along with data from a suitable analog(s). Data, whether measured or from analogs, are required for each of the following groups of organisms: algae, aquatic invertebrates and fish (all fresh water). If only estimated data are available, the use of estimated data may be acceptable in combination with EPA expert review. Data for marine species may be added when available."		Text was amended via addition of specific note 2 (incorporating part of former specific note 1): 'Acute toxicity data for algae, aquatic invertebrates and freshwater fish is required. Primary experimental test data are preferred, if available. Published and modelled data may be used, along with data from suitable analogues, in the absence of primary test data. The lowest value (highest toxicity) is used for evaluation.' The 'Hierarchy of data preferability to demonstrate conformance to Table 1 requirements:' was amended for clarity, as follows: 1. Existing primary experimental test data Where it exists, primary experimental test data is the preferred data source. As described in *Specific note 2* to Table 1, where available, whole-product toxicity test data will be considered in preference to individual ingredient toxicity test data, but either are acceptable. Primary test data can be from testing conducted (or commissioned) by the Applicant or from their supplier. This standard does not require primary test data to be generated if reliable data can be accessed through options 2 and 3, below. Annex F provides a list of tests to provide primary experimental data for aquatic toxicity, persistence and bioaccumulation. 2. Published data Data published in peer-reviewed literature or databases. A list of example data sources is provided in Annex G. 3. Modelled data In the absence of existing primary experimental test data or published data, modelled data from the EPA's Estimation Programs Interface for
The draft prioritises original laboratory data. SMEs often rely on supplier data or published registries (e.g., ECHA, US EPA) to avoid costly duplicate testing. Recommendation: Explicitly allow QSAR modelling, read across from similar substances, and supplier declarations as valid evidence when OECD data is unavailable.	Editorial	

For the use of primary experimental testing, do you need to have permission to use the data or can you use any publicly sources primary data? for example can you use dossiers that are present on ECHA for example. Whole product testing over individual component is fine, however if the individual components testing is accepted, would it not be better to say that you will accept both, but whole product would be seen more favourably or something like that. It is just a little unclear. For the modelled data, what circumstances will it be considered and when will it not? it is unclear and open for interpretation.	Editorial	Windows (EPI Suite™) may be considered. EPI Suite™ interfaces numerous models to provide users with estimates of a chemical's physical/chemical and environmental fate properties…' '…The most conservative result is used, that is, the lowest value (highest toxicity) among available data. Modelled data is not acceptable if the model is not validated, scientifically sound and appropriate for the chemical structure being assessed.'
Explicitly state that alternative data for fish toxicity is acceptable, referencing the US EPA Safer Choice standard from an animal-free testing perspective		
Page 19, Table 1, specific notes. Recommend removal of [former footnote 4, now footnote 5] as meeting the 10-day window ensures that chemicals are able to be considerably removed during STP treatment. Retention times in STP are often <1 day.	Editorial	Agreed. The recommendation to remove is justified, as the comment confirms the conservatism of the 10-day window and is therefore redundant. Footnote 5 was removed.
Re '(L/E/IC50)': The parameters LC50, EC50, and IC50 are not directly comparable in a risk assessment because they measure different types of effects—lethality, sublethal effects, and biochemical inhibition, respectively. Although, these parameters differ in terms of taxa, test duration, and endpoints, they can sometimes yield comparable toxicity values. In other cases, one taxonomic group may be significantly more sensitive than others, which can help identify the specific mode of action of a substance. When different types of toxicity data (e.g., LC50 for fish, EC50 for algae, IC50 for invertebrates) are available for a chemical across trophic levels, a conservative approach is typically used. In such cases, the lowest available toxicity value is often selected to define the hazard, ensuring adequate protection of the most sensitive species.	General	Taken as a comment; no change - this is the terminology used in the US EPA's document and the approach taken by the Standard
'EPA' is mentioned, but ... which one?		'US' added.

6.2.3 Dyes and colourants (3 commenters)		
Consultation comment	**Type of comment**	**Response/Action taken**
what are the maximum incidental levels of the remaining metals? if they are in the list of metals to not add intentionally they should have incidental limits present. if no cutoff limits apply to them, i would suggest that these should be stated as such.	Technical/editorial	No incidental limits are set for the other metals. Text amended as follows: 'No dye or colourant may have any of the following metals intentionally added during its production: arsenic, cadmium, cobalt, hexavalent chromium, lead, manganese, mercury, nickel and selenium. For the following metals, which are the priority focus of many jurisdictions, globally, ~~the~~ maximum allowable incidental levels ~~of the following metals~~ in the dye are set, as follows…'
Is there a reference for the metal limits?	Question	These limits are often used globally as a benchmark for technically unavoidable trace impurities in colourants and other raw materials used in cosmetic products. The values align directly with the maximum recommended levels for heavy metal impurities in cosmetics set by the Canadian government and US FDA. These incidental levels in the dye will result in very low incidental levels in the final in-use product, given the low concentration of dye/colorant in a product and the dilution factor applied in use.
Re natural colour, natural dyes are typically metal-free and represent a safer, more environmentally friendly alternative to some metal-containing synthetic dyes.	Comment	None needed.
Page 21, 6.2.3 'iii. Be a natural colour' The definition of a natural colour is unclear. We suggest you provide clarification around what is meant, e.g. organic/inorganic/mineral from a natural source and how much processing is allowed before it is no longer considered 'natural'.	Editorial	Agreed. Footnote added with ICNA Act definition and link: 'To be a natural colour, the ICNA Act 2019 definition of 'naturally-occurring chemical' must apply: (a) an unprocessed chemical occurring in a natural environment; or (b) a chemical occurring in a natural environment, being a substance that is extracted by: (i) manual, mechanical or gravitational means; or (ii) dissolution in water; or (iii) flotation; or (iv) a process of heating for the sole purpose of removing uncombined water; without chemical change in the substance; or (v) any other process prescribed by the rules for the purposes of this subparagraph. Further information is available at www.industrialchemicals.gov.au/business/getting-started-registration-importing-and-manufacturing/organic-and-natural-ingredients#what-is-a-naturally-occurring-chemical
Change name of section to 'Colourants' for simplicity	Editorial	Agreed.

6.2.4 Volatile organic compounds (4 commenters)		
Consultation comment	**Type of comment**	**Response/Action taken**
NPI Volatile Organic Compound Definition and Information link should be blue for consistency with the remaining links.	Editorial	Link added
Re 'Exempted compounds' - Term is Exempt Compounds Re exempt, 'One example- propylene glycol and diethylene glycol, which are solvents widely used in cleaning products, are typically excluded from VOC classification in many regulatory frameworks due to their low volatility and low photochemical activity. However, they are not officially classified as "exempt VOCs" by the U.S. EPA.'	Editorial	Text changed from 'Exempted' to 'Exempt'
The VOC limit here is lower in some product categories and higher in others compared to the California Air Resources Board's limits. Request to consider better alignment with CARB requirements.	Technical	An ecolabel can potentially go beyond CARB's standards and set a higher bar. A cross-check of the lists confirmed that all of our limits are lower or equivalent, and will be retained as written. It was agreed to add two more specific categories and limits: Disinfectant/sanitiser: 0.5% Odour removers: 1%
Defining 'VOC Exempt Compounds' will be helpful: 'VOC-exempt compounds are organic compounds that the U.S. Environmental Protection Agency (EPA) has exempted from VOC regulations because they don't significantly contribute to ground-level ozone formation. Hence, these are organic compounds that the EPA designates as having "negligible photochemical reactivity"'		Definition added in Section 5: 'VOC Exempt: An organic compound that is specifically excluded from the regulatory definition of a VOC because it has been determined to have negligible photochemical reactivity (refer to Section 6.2.4).' Rationale in Section 6.2.4 amended with the following addition: *'Some VOCs are classified as VOC-exempt. These are VOCs that the US Environmental Protection Agency (EPA) has exempted from VOC regulations because they do not significantly contribute to ground-level ozone formation. The EPA designates these organic compounds as having 'negligible photochemical reactivity'.*
In view of the contribution VOCs make to indoor air pollution and associated respiratory concerns, EPA restricts product VOC-content based on the most stringent government criteria. Safer Choice- and DfE-certified products must adhere to VOC restrictions as prescribed by the Ozone Transport Commission (OTC). VOC criteria from OTC can be found under "Regulatory & Technical Guideline for Consumer Products Phase V" at Model Rules and Guidelines - Ozone Transport Commission		No action required; the OTC limits appear to be the same as for CARB.

6.2.5 Phosphorus (2 commenters)		
Consultation comment	**Type of comment**	**Response/Action taken**
EPA Safer Choice products must not contain intentionally added phosphorous containing chemistries that contribute to the process of eutrophication...	General/technical	No action. Recognised sets a low limit rather than taking a no-intentionally added approach (the latter was discussed by the Recognised TWG but not agreed on).
Clarity addition for non-technical - ...0.5% by weight of intentionally added "elemental" phosphorus.	Editorial	New footnote added: 'Intentionally added phosphorus means where phosphorus is a component element of an intentionally added ingredient. Intentionally added ingredients are all the constituents of a formulated chemical product with the exception of incidental ingredients. Incidental ingredients are those ingredients that have no technical or functional effect in the product, but which may be present in the product at trace levels as an ingredient of another product ingredient, or as a result of their use during manufacture as processing aids.'

6.2.6 Sodium		
Consultation comment	**Type of comment**	**Response/Action taken**
The environmental impacts of excessive sodium in cleaning products include soil degradation, water quality effects such as increased salinity, harm to aquatic life in water bodies, and reduced efficiency in wastewater treatment, water reuse, and irrigation. There are no strict global regulations on the sodium content of cleaning products; however, some environmental certifications, such as the U.S. EPA's Safer Choice program, restrict sodium-based ingredients or require the use of biodegradable alternatives.	General comment	No action. Setting sodium limits could be the subject of discussion for future revisions of Recognised.
This requirement and rationale seems a bit vague. More information is desirable. In what situations might the License Holder be asked to disclose details of sodium content?	Editorial	Text amended for clarity, as follows: 'The Licence Holder for an accredited product under the Recognised ecolabel program must disclose ~~details of~~ the sodium content in the product concentrate (%w/w) upon request by a customer or interested party. This ensures transparency where the sodium concentration is relevant to considerations relating to, for example, environmental, human health, technical or regulatory considerations.'
clarity required - agree to disclose total elemental sodium content in the concentrate? In-use/per dose? in % w/w?	Editorial/Technical	

6.2.7 Palm oil and palm kernel oil (3 commenters)		
Consultation comment	**Type of comment**	**Response/Action taken**
We appreciate the different avenues to acheive the palm oil and palm kernel sourcing requirement and the exemption for ingredients that are less than 1% of product concentrate	General (commendation)	No action
The inclusion of palm oil and palm kernel oil traceability supports environmental responsibility in the countries where these raw materials are produced.	General (commendation)	No action
While we endorse responsible palm oil sourcing, SMEs face challenges fully auditing derivatives. Recommendation: Accept “book and claim” credits (RSPO or equivalent) as a primary compliance route for SMEs until certified derivatives are more widely available.	Technical	No change. Believe it is already clear from the Standard that certified sustainable or book and claim are both acceptable – see 6.2.7, first two dot points, and 4th dot point in evidence section. The input from the Recognised TWG participants was that traceable certified ingredients are now readily available but that the book and claim approach should be included for flexibility. And indeed, book and claim is the only option when ingredient origins cannot be traced – see last dot point in section 6.2.7.

6.2.8 Ozone-depleting compounds (1 commenter)		
Consultation comment	**Type of comment**	**Response/Action taken**
'EPA' is mentioned, but ... which one?	Editorial	'US' added

6.2.9 Primary packaging (2 commenters)		
Consultation comment	**Type of comment**	**Response/Action taken**
We appreciate that there are multiple pathways to achieving this requirement, especially since the applicant only needs to meet one of those pathways. Also key is the component exclusion. However, for suitable evidence, it may be necessary to elaborate how one might demonstrate how reusable packaging is practically being utilised. How many examples are required?	General + editorial	This will depend on the evidence being provided for reuse and is at the discretion of the Third-party Assessor.
The range of options for primary packaging is broad and encourages the adoption of at least one good practice. Regarding recyclability, we consider that validating the availability of recycling capabilities in each market may present some practical challenges. For the "reduced material use" option, it could be worth noting that when changing materials, the new material should offer equal or better recyclability than the original.		Re recyclability: The Standard currently states that the following evidence must be supplied: 'The packaging label and/or accompanying product information, identifying the post-use pathway and (for plastic) the resin code.' This evidence will be considered by the Third-party Assessor. If practical difficulties arise, the requirements will be reconsidered. Re reduced material use: This was discussed by the TWG and it was agreed that, although some options (e.g. soft plastic refills) will not be recyclable at present, the initiative of saving significant plastic volume was a valid action to take regarding primary packaging.

6.2.10 Microbeads (3 commenters)		
Consultation comment	**Type of comment**	**Response/Action taken**
Add 'and Nano-particles' including nanoparticles (0.0001mm). TiO2 is occasionally used in cleaning products as specialised formulations for photocatalytic activity as nano sized ingredient (for degrading organic residues) and in some cases as whitening agent (pigment grade). Its use in spray cleaning products may pose inhalation risks.	Technical	Text amended to make it clearer that the intent is to protect from microplastic and that the impacts of other substances, regardless of their size, is addressed by other criteria like 6.2.2 and section 6.3. New wording: 'Solid plastic microbeads (measuring < 5 mm in any dimension and that do not degrade or dissolve in water) ~~are not permitted~~ may not be intentionally added.' Rationale changed to*: 'Microbeads are solid plastic particles, historically used as abrasives in product formulations, that do not biodegrade and are too small to be effectively captured by wastewater treatment systems. When released into aquatic environments, they persist and accumulate, contributing to the growing problem of microplastic pollution. Research indicates that microbeads can absorb toxic substances, be ingested by aquatic organisms and enter food chains, creating risks for ecosystems and potentially for human health.* *'Banning intentionally added microbeads in commercial and I&I cleaning, hygiene and related products aligns with global best practice and regulatory trends. For example, Australia's ~~Environment Ministers from all states and territories~~ agreed on a voluntary phase-out of solid plastic microbeads ~~from~~ in certain ~~categories of~~ products, including industrial handwash, by 1 July 2018~~. This was progressed via~~, implemented through Accord's BeadRecede initiative. Legislation banning microbeads now exists or is planned in several Australian states and in many jurisdications worldwide. ~~While many of their respective governments acknowledge the success of the BeadRecede campaign, these laws aim to ensure these products remain microbead-free.~~* *'This criterion helps address the issue of microplastic pollution. The potential environmental and human health impacts of other solids that may be present in commercial and I&I cleaning, hygiene and related products are addressed by other criteria in this Standard.'*
Microbeads (specified as plastic, < 5 mm in any dimension), and there is reference to government regulations. Has consideration been given to the possible presence of even smaller particles (nanoparticles) that may also be of concern? They are usually not plastic, but consist of mineral substances (alumina, zinc oxide, titanium dioxide and possibly others) present as abrasives, sunscreens or merely opacifiers. I looked a Jif Cream which I use. The abrasive is said to be 'natural' and that speaks of 'mineral'. No solid is mentioned in the SDS, but there is a statement saying that all other constituents (unspecified) are non-toxic. A Bunnings advertisement says the particles are crystals derived from limestone, and other ads refer to 'micro-crystals'.	Technical	
Consider adding a lower limit here, as well as distinction of "intentionally added" microbeads or a definition of microbeads as fitting legal mandates. Microplastics and nanoplastics are increasingly present in the environment and test methods are not yet standardized. Producers should not be held accountable for unintentional microplastics present in the product.	Technical/editorial	

6.2.11 Product environmental claims (2 commenters)		
Consultation comment	**Type of comment**	**Response/Action taken**
at the end of the required evidence section bullet point 2, there is superscript ii. there seems to be no reference ot this in the section, what does this refer to?	Editorial	Superscript removed
Agreed on the importance of evidence to support environmental claims to prevent greenwashing. Valid third-party certifications should also be sufficient evidence if relevant to the claim.	General/editorial	Amend required evidence/ supporting information as follows: 'Evidence to support the environmental claim. Either of the below forms of evidence, or a combination, may be provided: o Third-party test reports or certifications o Company test reports/data'

6.3 Human health criteria (1 commenter)		
Consultation comment	**Type of comment**	**Response/Action taken**
Can a Biocides section be placed after the Fragrance section? Biocides are widely used in cleaning products and have significant health implications. They are regulated under the EU Biocidal Products Regulation (BPR) and the U.S. Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA).	Technical	No change, as safety of biocides is addressed by existing criteria. Most biocides are used as preservatives, which are exempt from environmental criteria (aquatic toxicity/biodegradation/bioaccumulation) as per specific note 10 under Table 1, with no concentration requirement; however, these would still be subject to the human health criteria.

6.3.2 Restricted Substances (3 commenters)		
Consultation comment	**Type of comment**	**Response/Action taken**
We appreciate the thoughtful consideration of these requirements as well the ability to have expert judgment of a third-party assessor to ascertain whether the effects are relevant to the use of the product, such as the ethanol example. Also appreciate the understanding that trace amounts may be present and cannot easily be removed.	General (commendation)	None required
For carcinogens, have you considered providing substitutes for any chemicals of concern? EPA Safer Choice products must not contain NTA [nitrilotriacetic acid], a potential carcinogen	Technical	The Standard restricts levels rather than proposing suitable chemistries, which is the domain of the formulator.
Neurotoxicity (non-carcinogenic), an important toxicological endpoint, can be caused by certain chemicals present in cleaning products. Therefore, it may be considered for inclusion, along with a dedicated Neurotoxicity sub-section, in the criteria outlined in Section 6.3.2. Whilst neurotoxicity is not explicitly covered as in the US EPA DFE criteria - it is indirectly considered under reproductive/developmental toxicants and VOC restrictions. Neurotoxicity is also one of the health impact categories assessed indirectly in the current Life Cycle Assessment (LCA) methods used for products. Evaluating the neurotoxic potential of chemicals within a product provides a more comprehensive understanding of the potential health risks associated with that product. Furthermore, identifying neurotoxic effects supports informed decisions in innovating product design, manufacturing, and chemical management, thereby reducing potential harm to human health and contributing to overall sustainability. Moreover, the ecolabel / standard for safer chemical ingredients (US EPA Safer Choice "Master Criteria") includes neurotoxicity in its criteria. The ingredients are evaluated for acute mammalian toxicity, repeated dose toxicity, and neurotoxicity among other endpoints.		No change. The ecolabel does not explicitly cover non-carcinogenic neurotoxicity as a standalone endpoint, as it does with carcinogenicity, mutagenicity and reprotoxicity (CMR). A few reasons to justify this: 1. CMR endpoints, which represent the most severe, long-term and often irreversible human health hazards, are embedded in the legal structure and hierarchy of chemical regulations (GHS, REACH, CLP). Non-carcinogenic neurotoxicity generally falls under Specific Target Organ Toxicity – Single or Repeated Exposure (STOT SE/RE), a classification based on observable, but less severe, effects compared to the hazard classes for CMR substances. 2. Indirect coverage – neurotoxic risks are often indirectly covered under other required criteria, such a reprotoxicity. 3. VOC restrictions – non-carcinogenic neurotoxicity is often associated with solvents and other volatile chemicals through inhalation. The Standard sets strict limits on VOCs.
Currently at GHS 11th revision, published 12th Sep 2025		New footnote added: 'GHS7 is the version to which Australia's model Work, Health and Safety (WHS) regulations are aligned and to which Australian SDS will be prepared. Other regulations may use a different edition of the GHS. Information on the SDS will be checked against the most current classification data (typically drawn from ECHA), which more recent versions of the GHS may inform.'

6.3.3 Fragrances (2 commenters)		
Consultation comment	**Type of comment**	**Response/Action taken**
Fragrances can be either synthetic or naturally derived. Essential oils, for instance, are primarily volatile, plant-based extracts that impart fragrance. Additionally, esters such as isoamyl acetate and methyl salicylate are also used in cleaning products—not primarily for their cleaning efficacy, but for their pleasant scents and their ability to function as solvents. Therefore, will the standard criteria for fragrances be equally applicable to both of these classes of chemicals? Above may be considered.	Technical	No action. Other fragrance ingredients not listed on the exempt lists are permitted only if they pass the health criteria requirements. The Standard is agnostic to the origin of the fragrance.
Appreciate the exemption of IFRA fragrances.	General (commendation)	None needed

6.3.4 Corrosives (1 commenter)		
Consultation comment	**Type of comment**	**Response/Action taken**
Why might the request for pH information be made?	Question	In the absence of corrosion/irritation data, a pH-based assessment can be applied. That is, if pH is less or equal to 2 or greater or equal to 11.5 and no data for acidity/alkalinity is available, the product would be classified as corrosive. Text amended to: 'The Applicant agrees to provide information on the product pH (as an indicator of corrosivity in the absence of corrosion/irritation data) or whether it is classified as H314, upon request.'

6.3.5 Sensitisers (3 commenters)		
Consultation comment	**Type of comment**	**Response/Action taken**
H317 cutoffs are generally 1% except when specified as being 0.1%, why is this cutoff being 0.1% in that case? just because they have most likely previously been exposed to ingredients, why does this then mean that lower exposure limits apply, that is why i thought the 1% was present in the first place.	Editorial/Technical	Re the % cut-off: US EPA Safer choice - No ingredients classified under GHS as skin or respiratory sensitisers are permitted in certified products Under the Australian Work Health and Safety (WHS) Regulations, Sensitisers are split into two hazard classes, each with a single category, and specific concentration cut-offs for mixtures. Sub-cat 1A >0.1% Sub cat 1B >1% We have taken the more stringent 0.1% approach.

6.3.5.1 Enzymes supplied in granulated form, sometimes referenced as encapsulated granulates or in liquid form should be exempted from the general cut-of limit for Respiratory Sensitisers. The concentration for safe used should be shared by the enzym supplier together with the risk characterization ratio for the specific use.		Allow this exemption. Text amended as below:
		'Any ingredient that is classified as Respiratory Sensitisers Category 1 (H334) must be present at < 0.1% in the product concentrate (or most concentrate dilution, if the product is only available with a closed-dispensing system).
		
		Products containing enzymes in granulated or in liquid form are exempt from the < 0.1% limit. In this case, the Applicant must adhere to the concentration for safe use, as provided by the enzyme supplier. Products containing other H334-classified ingredients for which it can be demonstrated that the respiratory sensitisation risk no longer applies in the formulation are also exempt from the < 0.1% limit.
		
		Required evidence/supporting information:
		• Ingredient list provided in fulfilment of Section 6.1.2 confirms that any ingredient classified as H334 is present at < 0.1% in the product concentrate.
		• For an enzyme (or other proposed exempt ingredient), the SDS provided in fulfilment of Section 6.1.2 will be used to confirm the hazard classification, composition and physical form of the ingredient
		
		AND, if applicable,
		• Product/technical specification sheet for any proposed exempt ingredient to confirm recommended concentration/dilution ratios.
		• Evidence that contact with the product concentrate is not possible, which may include:
		  ○ a photograph/diagram/description of the product container, closure and dispensing mechanism
		  ○ the manufacturer's instructions for use
		  ○ a photograph of the product label showing the warning statement'

why is there reference to H313 in the skin sensitiser section?	Editorial	Typo corrected to H317
Is there a typing error in "Ingredient list provided in fulfilment of Section 6.1.2 confirms that any ingredient classified as H313 is present at < 0.1% in the product concentrate."H313 is referring to toxicity on skin contact whereas the section as such is related to skin sensitization.	Editorial	Typo corrected to H317
For sensitizers, have you considered providing substitutes for any chemicals of concern?		The Standard restricts levels rather than proposing suitable chemistries, which is the domain of the formulator.

6.3.6 Product human health claims (1 commenter)		
Consultation comment	**Type of comment**	**Response/Action taken**
at the end of the required evidence section bullet point 2, there is superscript ii. there seems to be no reference to this in the section, what does this refer to?	Editorial	Superscript removed

6.4 Microorganisms (2 comments)		
Consultation comment	**Type of comment**	**Response/Action taken**
We support to include microorganisms in the ecolabel criteria. As a supplier of spores for microbial cleaning we are seeing an increasing interest to an alternative to traditional chemical cleaning products.	General (commendation)	None needed
The microbiological requirements are highly detailed and may be disproportionate for products where microorganisms are a minor component. Recommendation: Introduce simplified pathways for low-percentage or non-viable microbial formulations, with phased evidence requirements.	Technical	No changes. Given the different set of concerns for live microorganisms compared to chemical ingredients (i.e., the potential for even very low percentages to proliferate under the 'right' conditions), we believe the requirements specified by the Standard are important as these confirm identity/non-pathogenicity, purity, susceptibility to antimicrobial agents and delivery/information requirements. Ingredients that are microbial products (e.g., enzymes) are subject to the other criteria in this Standard. Additionally, there were no major changes to the microorganism criteria from the previous version of the Standard – the requirements are essentially the same.

6.4.1 Taxonomic identification (1 commenter)		
Consultation comment	**Type of comment**	**Response/Action taken**
Proposal to rephrase to: All intentionally added micro-organisms shall belong to or be deposited in a collection of an International Depository Authority and be maintained by the culture collection of the authorised period of certification. Rational: the suppliers of microbial spores are acting on the global market and may already have registered in another recognised strain collection DB.	Editorial/Technical	Text changed as follows: 'All intentionally added microorganisms must be pure and either: • belong to or be deposited in a collection of an International Depository Authority (e.g., WFCC-MIRCEN World Data Centre for Microorganisms http://ccinfo.wdcm.org/) and be maintained by the culture collection for the authorised period of certification OR • be precisely identified by a specialist laboratory to: o the species level for all microorganisms o the strain level for species that include higher-risk strains (e.g., opportunistic pathogens or food-poisoning organisms). Acceptable identification methods (context-dependent[1]): • 16S rDNA or rRNA sequencing remains a widely used and suitable method, provided appropriately validated databases are applied. • Whole Genome Sequencing (WGS) offers comprehensive resolution and should be considered where feasible, noting that time and cost may limit its use in some cases. • MALDI-TOF is generally acceptable and efficient for many species; however, limitations may arise where species-level resolution is not achieved. *Required evidence/supporting information:* • International Deposition Authority collection listing OR • Specialist laboratory taxonomic identification report, including results from one or more of the above methods, appropriate to the context.' '[1] Depending on the risk, purpose, and resources available.'

6.4.5 Exposure during use (YOPI, food handling/processing) (2 commenters)		
Consultation comment	**Type of comment**	**Response/Action taken**
Further consideration and nuance is needed regarding products containing microorganisms in spray applications. In some cases, spray application may be the most effective or appropriate delivery method, and certain probiotic strains may be safe and suitable for such use. Also, while these products may not be intended for use in areas commonly frequented by YOPI (young, old, pregnant, and immunocompromised) populations, it is unclear how producers could reliably verify that such exposure does not occur. In practice, unintended use or misapplication is always a possibility, and this should be factored into the criteria.	Technical	Continue excluding aerosols, erring on the side of caution. Permit use on food contact surface if QPS. Text changed as follows: 'To help prevent the inhalation of ~~aerosolised~~ microorganisms, products containing microorganisms must not be applied as aerosols ~~used with spray application.~~ Additionally, products containing microorganisms must not be intended for use in areas commonly frequented by vulnerable populations ~~or for use on food-contact surfaces~~, unless it can be demonstrated that there is a low risk of exposure to the vulnerable population, for example, due to the mode or nature of product application, or on food-contact surfaces, unless it can be demonstrated that the microorganisms are safe for food use (e.g. QPS organisms[1]). *Rationale: Research into the causes of laboratory-acquired microbial infections has indicated that a high proportion (up to 80%) of infections is caused by inhalation of aerosols.*[2] *Vulnerable populations include children under 5 years of age, adults over 65, pregnant women and immunocompromised individuals. These categories may be more susceptible to infection than healthy adults on whom Risk Group classifications (see Section 6.4.3) are based. This Standard takes a cautious approach to help ensure safety.'* '[1] The Qualified Presumption of Safety (QPS) list can be accessed from the EFSA website [2] Collins, C. H. and Kennedy, D. A. (eds.) Laboratory-acquired infections: history, incidence, causes and prevention. 4th ed. Oxford: Butterworth Heinemann, 1999; cited in AS/NZS 2243.3:2010.'
We propose to limit the application form to non-aerosol forming products. Other studies suggest that microbial cleaning products may increase the general wellbeing including in hospital areas. We propose to permit the use on food contact surfaces if it can be demonstrated the microorganisms are safe for food use e.g. QPS organisms.		

Section 7 Whole of Business (4 commenters)		
Consultation comment	**Type of comment**	**Response/Action taken**
Overall, we have concerns about requiring a producer to meet the entire set of whole-of-business criteria in order to have a single product certified — particularly when that product may represent only a small portion of their overall business. This requirement is extensive, and producers must complete the process before gaining any marketing benefit from product certification. We suggest establishing two separate recognition pathways: one for product certification and another for business-level recognition. This would allow companies to market achievements more accurately and incentivize broader participation without creating unnecessary barriers. Aside from this point, we find the section requirements below to be practical and sensible from a sustainability perspective.	General	The additional hurdle of the WOB requirements is acknowledged but with a 6-year validity (once passed), consider that the requirements will not be too onerous. There is also reasonable flexibility as to how businesses can meet the criteria.
We also value the inclusion of the whole-of-business criteria, which assess environmental and social aspects across the entire organisation rather than focusing solely on the product level. This holistic approach — including areas such as extended producer responsibility and social considerations — is very positive.	General (commendation)	None needed
The addition of whole-of-business criteria embeds continuous improvement and aligns the ecolabel with international best practice.	General (commendation)	None needed
The draft requires companies to demonstrate progress across energy, GHG, water, waste, sourcing, and social responsibility. While valuable, this level of reporting may be burdensome for SMEs with limited regulatory capacity. 👉 Recommendation: Consider a phased or tiered approach for SMEs, where the depth of evidence scales with company size. This would maintain integrity while encouraging SME participation.	General	The 6-yearly application process has been explained to this respondent, in case they thought this information needed to be provided with each product application.

7.1 Ingredient/material sourcing (3 commenters)		
Consultation comment	**Type of comment**	**Response/Action taken**
Re 'These efforts may include': Efforts may need to cover main aspects and principles of circular economy.	General	None needed
Re 'Prioritising the use of ingredients with decreased environmental impacts in production (e.g., produced using renewable energy...': add 'and eco-friendly technologies'	Editorial	Text amended to: 'Prioritising the use of ingredients with decreased environmental impacts in production (e.g., produced using renewable energy, with effective production waste minimisation procedures, using environmentally-friendly technologies, etc), or requiring this of their contract manufacturer (depending on responsibility for ingredient sourcing)'.
Re '(e.g., certified sustainable paper and cardboard for use in offices; secondary/tertiary packaging and pallets that are made from recycled timber or alternative sustainable materials)': 'and includes 'Green Procurement', and as may be applicable to tenders'	Editorial	''green' procurement' added, as follows: 'Prioritising the use of materials with decreased environmental impacts (e.g., certified sustainable paper and cardboard for use in offices; secondary/tertiary packaging containing recycled content; pallets that are made from recycled timber or alternative sustainable materials) and 'green' procurement.'
In the area of tertiary packaging, we see a strong opportunity to promote reuse and the incorporation of recycled resin.	Technical	This was the intent of the example. Text amended to make this clearer – see the box above.
Prioritising ingredients with higher active content to reduce water transport?		No change. This is more related to the concentration requirement (6.2.1) than sourcing impacts.

7.2 Energy efficiency and greenhouse gas emissions (1 commenter)		
Consultation comment	**Type of comment**	**Response/Action taken**
Re dot point 3, 'Adopting energy-efficient technologies (e.g., electric vehicles, LED lighting or energy-efficient appliances)' 'Adopting more eco-friendly and energy efficient technologies….'	Editorial	No change. 'Eco-friendly' is a general term and here we are talking specifically about energy. Additionally, this list is non-exhaustive.

7.5 Social (1 commenter)		
Consultation comment	**Type of comment**	**Response/Action taken**
Split into two sections to make the requirements clearer: 7.5.1. To cover the compliance with human rights/rights at work requirements 7.5.2 To cover meaningful and positive social impact	Editorial	Agreed – Social requirements split into two sections.

Section 1, Introduction (1 commenter)		
Consultation comment	**Type of comment**	**Response/Action taken**
ISO14020:2022 and ISO 14024:202X - Spell these out at first mention	Editorial	Full names of standards added to text.

Section 2, Scope (3 commenters)		
Consultation comment	**Type of comment**	**Response/Action taken**
Re 'Geographical framework' - Is this proposed as a global framework? Or something that will only apply to products sold in Australia? This is not clear.	Question/editorial	(It is a requirement of the Global Labelling Network that the ecolabel has 'open access to potential licensees from all countries') Text amended as follows: 'Application for accreditation under Recognised is open to Applicants ~~in any jurisdiction~~ from all countries ~~and~~ for in-scope products available on any market. However, all documentation and communications must be in English.'
Re 2.3.2 Product Criteria scope: Could this also include an overall comparative environmental performance—focusing on environmental excellence as compared to competitors beyond mere compliance? This will enable and enhance consumer trust, and encourage continuous innovation among producers.	Editorial	Paragraph 2 amended to: 'The Product Criteria are designed to promote environmental product excellence and encourage continuous innovation by producers by minimising the environmental and human health impacts of products through:…'
I don't think it can be said that the criteria minimise environmental and human health impacts. A more correct statement would be that meeting these criteria help to minimise environmental and human health impacts. I think the wording of the dot points needs to be consistent in form, so I have suggested some edits so that each begins with an action, as follows: *(see subsequent rows for each comment)*	Editorial	Understand the intent of the proposed changes to wording but disagree with some of the specific wording changes as they do not reflect the Standard requirements. See above box and the following rows for rewording:
• requiring product concentration to be specified		• requiring products to be concentrated
• setting stringent aquatic toxicity, persistence and bioaccumulation requirements		• setting stringent aquatic toxicity, persistence and bioaccumulation requirements
• restricting the inclusion of dyes and colourants that may be toxic		• restricting the use of heavy metal–containing dyes and colourants
• setting limits for volatile organic compounds		• setting limits for volatile organic compounds (VOCs)
• restricting the phosphorus and sodium content		• restricting the phosphorus content
• promoting sustainable palm oil and palm kernel oil derivatives by requiring disclosure of sources		• promoting sustainable palm oil and palm kernel oil derivatives
• setting requirements for primary packaging and fragrances		• setting requirements for primary packaging and fragrances
• prohibiting microbeads and other ultra-finely divided solids		• prohibiting solid plastic microbeads
• restricting the concentrations of acutely toxic substances		• prohibiting substances that are acutely toxic to humans
• restricting carcinogens, mutagens, reproductive toxins and sensitisers		• restricting carcinogens, mutagens, reproductive toxins and sensitisers

• requiring evidence for any performance, environmental and human health claims		• requiring evidence for any performance, environmental and human health claims
• setting requirements for microorganism-containing products		• setting requirements for microorganism-containing products

Section 3, the Recognised accreditation process (2 commenters)		
Consultation comment	**Type of comment**	**Response/Action taken**
Please see feedback regarding the whole-of-business criteria		None required
Re Independent Review - 'Is this independent review up to the submitters discretion in terms of whom they choose? Or does Recognised identify the independent reviewers that submitters can use?'	Question	Text amended to the following: 'The Independent Expert is subject to competency, impartiality, independence and confidentiality requirements, as described in the *Recognised Third-party Assessor and Independent Expert Requirements*. The Independent Review follows the Third-party Assessor's *Screening and Technical Procedure*, a standardised process document provided to the Independent Expert. Refer to the *Recognised Third-party Assessor and Independent Expert Requirements* for more information.'
Re process (diagram) - 'If there is a fail, will the applicant have to start from the beginning of the process, or is there a chance for a re-review from exactly where the applicant may have failed?'		This is a valid point. The Standard Criteria (2022) confirms a remedy period is available. As outlined on page 4 of that Standard, if an application receives a 'missing information' notification during the technical assessment phase, the applicant was granted 60 days to provide the necessary materials before the assessment lapses. This period is too long and a 20 day period is considered more appropriate. Revised Figure 1 explicitly incorporates this remedy phase.

Section 4, Governance (1 commenter)		
Consultation comment	**Type of comment**	**Response/Action taken**
Greater formalisation of governance, transparency, and engagement processes would strengthen the scheme's public legitimacy and stakeholder confidence. By embedding independent oversight, digital accessibility, and continuous feedback loops, Accord can position Recognised as a national benchmark in sustainable product certification.	General	Specific comments are considered point by point, below
3.1 Governance and Independence While the governance structure (Accord as Program Operator, independent Third-party Assessor, and Independent Expert) demonstrates procedural separation, the model remains highly dependent on Accord for coordination, funding, and final licensing. This may create perceived limitations to impartiality. Enhancements could include: - Establishing a Recognised Governance Committee comprising independent representatives from government, academia, and consumer groups to oversee periodic review and appeals - Clarifying conflict-of-interest management procedures for Third-party Assessors and Independent Experts, ideally within a published Governance Charter. - Introducing an external audit or peer review mechanism (every three years) to validate the integrity of the assessment process.		- The suggestion of a Governance Committee will be considered. - Two new documents are near finalisation: the Recognised Rules, and Requirements for Third-party Assessors and Independent Experts. The former sets out the governance and procedural aspects of the Recognised program; the latter sets out requirements for Third-party Assessors and Independent Expert including aspects like competence, conflict of interest, confidentiality, etc. Both documents. will be publicly available via the Recognised webpages. - A 3-yearly external audit has been conducted in the past by RSM Australia and in future will be conducted periodically via GENICES (the Global Ecolabelling Network audit process).
3.2 Transparency and Accountability The Standard demonstrates a strong evidence-based foundation but limited public visibility regarding decision-making and performance outcomes. Recommended improvements include: - Publishing summary outcomes of annual and triennial reviews, including aggregated compliance trends and case studies of improvement.		- Re transparency - all previous audit reports are available online, as are all outcomes of previous expert reviews. The outcomes of the current consultation will also be made available online.

- Creating a publicly accessible register of accredited assessors and review experts, with qualification details to enhance confidence in technical capability. - Introducing a transparent appeals process for applicants, outlined within the Rules or an annex to the Standard.		- Requirements for Third-party Assessors and Independent Experts will be published online – this sets out the capability requirements. Additionally, the Third-party Assessor is identified publicly, including information about qualifications. Will consider suggestion re publishing qualification details of assessor and expert. - 'Resolution of complaints, disputes and appeals' is covered in the Recognised Rules, which will be published online
3.3 Utility and Usability The document's length and technical density may challenge smaller applicants or SMEs with limited in-house expertise. Simplifying entry pathways could enhance uptake: - Develop tiered assessment templates or self-assessment checklists for early-stage applicants - Provide cross-referencing summaries of mandatory vs. optional criteria to aid navigation. - Introduce a digital submission platform with embedded guidance and evidence upload capability to improve usability and reduce administrative burden.		- The suggestion to add an assessment checklist as an Annex to the Standard will be considered. It could also be provided via the Third-party Assessor's website. The Third-party Assessor and Accord are available to assist with interpretation of the Standard. - All criteria are mandatory. -Applications are submitted by an e-form. There are separate online forms for Whole-of-business and Product applications. The Third-party Assessor is the point of contact for any difficulties/ questions relating to the application process.
3.4 Industry Engagement and Stakeholder Confidence The 2025 revision has broadened environmental and social expectations, yet sustained engagement mechanisms remain limited. To ensure ongoing credibility: - Formalise annual stakeholder roundtables (industry, government, consumer) to review evolving ESG expectations. - Strengthen alignment with government sustainable procurement frameworks, particularly the Commonwealth Sustainable Procurement Guide and NSW Sustainable Choice Program.		- Accord keeps abreast of the ESG landscape and regular reviews are conducted by the Recognised TWG. Will consider comment about a broader stakeholder group – noting that consumer should be replaced by 'commercial product user' (or similar) as these products are not consumer-facing. And noting the challenge of motivating participation in such a group. - Agreed re strengthening alignment.

- Consider partnerships with certified training organisations to build assessor and applicant capacity, reinforcing the program's educational objectives.		- Re training, I (JS) have not been able to identify organisations that provide training to assessors of ecolabels. Re applicant capacity, Accord is constantly looking for opportunities to inform/build Member capacity on various topics relating to sustainability. We can consider how this could be also be considered for Recognised licence holders.
To enhance the Recognised ecolabel's governance integrity, transparency, and value to industry and government, the following actions are recommended: 1. Governance Reform: Establish an independent oversight committee and publish governance policies (conflicts, appeals, periodic audits). 2. Transparency and Reporting: Introduce public reporting on scheme performance, assessor credentials, and summary consultation outcomes. 3. Digital Modernisation: Develop an online portal integrating application tracking, document upload, and feedback functions. 4. Industry Capacity Building: Offer webinars and short courses on evidence preparation and ESG integration for applicants. 5. Strategic Alignment: Explore recognition under Australian Government procurement frameworks or alignment with ISO/IEC ecolabel registries to bolster credibility. 6. Periodic External Review: Commission an independent review every three years to assess effectiveness, uptake, and stakeholder satisfaction. Will take this comment under consideration		1. Recognised Rules are nearly finalised and will be published. Suggestion re independent oversight committee will be taken under consideration. 2. Assessor requirements will be published. Public register of accredited products exists. Summary consultation outcomes have been published in the past and will be this time also. 3. Yes, have this – external to Accord (Third-party Assessor). It assigns application numbers, allows document upload, application review and provides set notifications to the Applicant and Accord at milestones in the application process 4. Accord provides general ESG information/ updates via a quarterly informal forum for members. Recognised webinar/training is available upon request. 5. Good idea re Australian govt. procurement. Alignment with ISO ecolabel registries in underway via Global Ecolabelling Network membership and future GENICES audit 6. Will take this comment under consideration

Section 5, Abbreviations and definitions (1 commenter)		
Consultation comment	**Type of comment**	**Response/Action taken**
Re GHS: 'Below may be considered in an appropriate place in the text: 'Revised versions of GHS 10 & 11 have been implemented by UNECE, while Australia has not yet adopted these versions and implements GHS7.' How relevant are these new version changes to cleaning products used in other jurisdictions? The GHS 10 & 11 changes to cleaning products become relevant if one manufacture, import or export cleaning products internationally (especially to Europe, Canada, or Asia-Pacific countries implementing newer GHS versions. The products may include aerosols, corrosive substances, multi-ingredient formulations, or irritants. It would be required to update SDSs or labels for multiple jurisdictions. In Australia, GHS 7 based Safety Data Sheet (SDS) is provided as it aligns with the model WHS regulations. However, this may require verifying the information in the SDS against the most up-to-date classification data—typically sourced from the European Chemicals Agency (ECHA)—which may reflect more recent versions of the GHS.		The following footnote was added to the definition of GHS: 'GHS: Different jurisdictions have adopted different versions of the GHS. For example, revised versions of GHS 10 & 11 have been implemented in Europe, while Australia implements GHS 7. https://unece.org/ghs-rev7-2017' Additional comments from the Third-party Assessor: GHS7 is provided as this is the version to which the model WHS safety regulations are aligned and to which Australian SDS will be prepared. That said, the plan will be to check the information on the SDS against the most current classification data (typically drawn from ECHA), which more recent versions of the GHS may inform. Most regulations (WHS, ADG Code etc) will state the current version of the GHS in place when they were published. For example, the most recent Australian ADG Code states below: *GHS means the tenth revised edition of the Globally Harmonized System of Classification and Labelling of Chemicals, published by the United Nations as document ST/SG/AC.10/30/Rev.10. (Other regulations may use a different edition of the GHS)* (Also see 6.3.2 Restricted Substances section of this document)
Defining 'VOC Exempt Compounds' will be helpful: 'VOC-exempt compounds are organic compounds that the U.S. Environmental Protection Agency (EPA) has exempted from VOC regulations because they don't significantly contribute to ground-level ozone formation. Hence, these are organic compounds that the EPA designates as having "negligible photochemical reactivity."		The following definition was added: 'VOC Exempt: An organic compound that is specifically excluded from the regulatory definition of a VOC because it has been determined to have negligible photochemical reactivity (refer to Section 6.2.4).'

ANNEX I (1 commenter)		
Consultation comment	**Type of comment**	**Response/Action taken**
Listing PEG (polyethyleneglycol) as a palm oil product is an error but I think I can see how it has come about. The polyethylene glycols, containing various numbers of ethylene oxide units, are made from petroleum-based sources, via ethylene oxide, not palm oil. Their chemical structures are represented by HO-(C2H4O)n-C2H4OH. A number of surface-active substances, including detergents, and made by reacting long-chain alcohols, such as lauryl alcohol that may be derived from palm oil, with ethylene oxide, and they have structures like C12H13-O-(C2H4O)n-C2H4OH. An ionic group such as sulphate might be added to the right-hand end, too. Generic terms, or may short descriptions, should be used to cover substances with such 'hybrid' molecules.	Technical	PEG removed