Products for cleaning, disinfection and hygiene

Basic Admission Criteria

Version 15, January 2026

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1. Introduction

This document is published by the Research Institute of Organic Agriculture (FiBL) and EASY-CERT services GmbH organic inputs evaluation (EASY-CERT). It describes the criteria that need to be fulfilled in order for cleaning, disinfection and hygiene products to be included in any of the FiBL and EASY-CERT Input Lists. Additional criteria may apply for products to be included in a national list or a list of a private association for organic farming. The document will be updated whenever necessary. The most recent version, which is available on the websites of FiBL (www.input-list.com) and EASY-CERT (www.betriebsmittelbewertung.at), is the only valid version.

The Basic Admission Criteria

EU organic farming is governed by a basic Regulation (Reg. (EU) 2018/848 as amended) plus the implementing regulation (Reg. (EU) 2021/1165). For products for cleaning, disinfection and hygiene, the Commission adopts the lists of products from Annex VII to Commission Regulation (EC) No 889/2008. For the time being, this document provides references to the old as well as the new organic legislation[1]. The Basic Admission Criteria, developed by FiBL and EASY-CERT, are a competent interpretation of this legislation, enabling a standardised evaluation of inputs for organic farming in Europe and a harmonised, cross-border approach.

Since national legislation is nevertheless relevant with regard to the categorization of certain products, there may be national differences in the conformity of individual products, due to applicable national legislation. The Basic Admission Criteria take into account effects on human health and/or the environment as well as the risk of causing residues. Furthermore, the scope of uses is broader than the one covered by the EU organic legislation.

[1] Reg. (EC) 834/2007 repealed by Reg. (EU) 2018/848; Reg. (EC) 889/2007 repealed by Reg. (EU) 1165/2021

2. Requirements concerning the composition

This chapter describes a set of requirements which are applied either to the components of a product or to the product as a whole. Not all requirements apply to all product types. Tab. 1 explains which requirements apply to which types of products.

Table 1: Overview showing which requirements apply to which products (yes = applies; no = does not apply).

	Product for use in …				
Requirement	**Livestock buildings and installations, aquaculture**	**Milking facilities**	**Crop production**	**Processing**	**Animal care**
Active substances in Annex VII (see section 2.1)	**yes**	**no**	**no**	**no**	**no**
Exclusion of unwanted substances (see section 2.2)	**yes**	**yes**	**yes**	**yes**	**yes**
Exclusion of substances with unwanted properties (see section 2.3)	**yes**	**yes**	**yes**	**yes**	**yes[2]**

2.1 Allowed active substances

Background

The EU organic legislation contains a list of substances for cleaning and disinfection (Annex VII of Reg. 889/2008[3]). FiBL and EASY-CERT have adopted this list. However, formaldehyde is a substance of very high concern[4] and is therefore prohibited by several organic farming associations.

[2] with exceptions, see chapter 2.4

[3] For the time being, the substances that were authorized under the old regulation (Annex VII of Reg. 889/2008) may continue to be used under the new organic regulation (see Article 5(4) of Reg. 2021/1165).

[4] It is classified as toxic and carcinogenic, and suspected to be mutagenic, see https://echa.europa.eu/nl/substance-information/-/substanceinfo/100.000.002.

In line with the interpretation of EGTOP[5], FiBL and EASY-CERT apply Annex VII only to active substances. Note: In certain countries (e.g. Austria, The Netherlands), national legislation specifies which active substances may be used in organic crop production. Where this is the case, this legislation is taken into account by the complementary national admission criteria.

Annex VII applies in different ways, depending on the field of use. For cleaning and disinfection of *buildings and installations for livestock production*, section 1 of Annex VII applies. For cleaning and disinfection of *milking facilities* and *teats*, Annex VII of Reg. 889/2008 allows all substances. For cleaning and disinfection in *crop production* and *processing facilities*, Annex VII of Reg. 889/2008 contains no provisions at the moment. Thus, FiBL and EASY-CERT do not apply Annex VII of Reg. 889/2008 for such products. For cleaning and disinfection in *aquaculture*, section 2 of Annex VII of Reg. 889/2008 applies. At the moment, however, the FiBL and EASY-CERT Input Lists do not include such products and have therefore not developed a policy for such products.

Application of requirements

The requirements concerning active substances are applied

- to all products for use in buildings and installations for livestock production, but
- not to products for other uses.

Requirements

- All components which are active substances must be listed in section 1 of Annex VII of Reg. 889/2008.

2.2 Prohibition of unwanted substances

Background

Commercial products for cleaning and disinfection contain not only active substances, but also a wide range of other substances (so-called co-formulants). Because the EU organic legislation does not regulate these components, FiBL and EASY-CERT have developed their own policy, taking into account other legislation and expertise such as

[5] Expert Group for Technical Advice on Organic Production

REACH[6], EU Ecolabel[7], the EU Detergents Regulation[8] and the EGTOP reports on cleaning and disinfection[9].

Safeguard clause

In addition to the requirements in this document as well as in the General Business contract, FiBL and EASY-CERT reserve the right to exclude substances or products from all categories if the evaluation team considers that their use does not comply with the objectives and principles of organic production according to Reg. (EU) 2018/848 Art. 4 and Art. 5, or if there is evidence that they could have serious adverse effects on human health and/or the environment (e.g. carcinogenic, mutagenic, toxic to reproduction, endocrine disrupting, toxic to aquatic organisms, low biodegradability, persistent).

Application of requirements

The requirements concerning unwanted substances are applied

- to all products groups.

Requirements

- The substances listed in Table 2 are not allowed in the products.

[6] REGULATION (EC) No 1907/2006 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), establishing a European Chemicals Agency, amending Directive 1999/45/EC and repealing Council Regulation (EEC) No 793/93 and Commission Regulation (EC) No 1488/94 as well as Council Directive 76/769/EEC and Commission Directives 91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC

[7] COMMISSION DECISION (EU) 2017/1217 of 23 June 2017 establishing the EU Ecolabel criteria for hard surface cleaning products.

[8] REGULATION (EC) No 648/2004 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 31 March 2004 on detergents

[9] EGTOP report on cleaning and disinfection (2016); Criteria for evaluation of products for cleaning and disinfection, Draft Report (2020)

Table 2: Unwanted substances.

A) Unwanted surfactants
• **Alkylphenolethoxylate (APEO)** • **Fluorosurfactants** • **Poorly biodegradable quaternary ammonium compounds (QAC´s)**
B) Unwanted acids (including their salts)
• **Phosphoric acid and its salts (phosphates) (small amounts up to maximum 1% are tolerated in all products; use in products for dairy equipment is allowed)** • **Phosphoric acid esters** • **Phosphonic acids (H_3PO_3) and their salts are excluded (exception: organophosphonic acids and their salts e.g. HEDP, DTPMP, ATMP, PBTC are permitted up to maximum 1%)** • **Phosphonic acid ester / Polyphosphonates** • **Phthalic acid esters / Phthalates** • **Persistent long-chain polycarboxylic acids (short-chain, such as ascorbic acid, tartaric acid, citric acid, are permitted)** • **Boron-containing acids** • **Methoxyacetic acid (exception: in glycolic acid permitted up to maximum 0.6 %)** • **Methyl methanesulphonate (MMS) (exception: in methanesulphonic acid up to maximum 0.001 %)**

C) Unwanted other components

- **Biphenyl-2-ol**
- **Electrolyte water**
- **Other chlorine releasing substances / Active chlorine**
- **Chlorine dioxide**
- **Diethanolamine**
- **Monoethanolamine**
- **Ortho-, Meta- and Para-Phenylenediamine (PPD / PDA)**
- **Chlorofluorocarbons**
- **Triclosan**
- **Perchlorates**
- **Ethylenediaminetetraacetic acid (EDTA), Diethylenetriaminepentaacetic acid (DTPA), Nitrilotriacetic acid (NTA) and their salts, as well as other comparable synthetic chelating agents**
- **Formaldehyde-releasing substances**
- **Ammonia and ammonia-releasing substances**
- **Synthetic nanoparticles (< 0.3 µm), in particular silver nanoparticles**
- **Enzymes of GMO origin (note: enzymes of non-GMO origin are allowed)**
- **Bromine compounds**

2.3 Exclusion of substances with unwanted properties

Background

Substances are classified with certain hazard statements according to Reg. 1272/2008. This indicates their hazards with respect to human health and the environment. Many substances with unwanted properties have been categorized as 'unwanted substances' by FiBL and EASY-CERT (see above). As an additional safeguard, the FiBL and EASY-CERT Input Lists also exclude other substances that are classified with the hazard statements shown in Tab. 3.

Application of requirements

The requirements concerning substances with unwanted properties are applied to all product categories.

Requirements

- Components which are classified with one of the hazard statements relating to human health (given in Table 3A) are excluded.
- Products which are classified with one of the hazard statements relating to impact on the aquatic environment (given in Table 3B) are only accepted, if one of the following reasons is fulfilled:
  - The product is classified based on a classification of one or more substances explicitly mentioned in Annex VII of Reg. 889/2008.
  - The product is classified based on a classification of alkylamine-based surfactants: the surfactants are readily degradable and non-bioaccumulating.

    A substance is considered to be not bio-accumulating if the BCF is < 100 or log Kow is < 3,0. If both the BCF and log Kow values are available, the highest measured BCF value shall be used.
- The evaluation team may exceptionally allow a component that is classified with H 317, H 334 or H 372, if (i) the risk for the user is minimized by the mode of application and (ii) there are no suitable alternatives.
- Exceptions for *natural plant extracts and oils*:
  - the hazard statements H317, H410 and H411 are not taken into account
  - all other hazard statements are only taken into account for components that make up at least 5 % in the formulation.
- Exceptions for *enzymes*: the hazard statements H317, H334, H410 and H411 are not taken into account.
- Exception for *substances explicitly mentioned in Annex VII* of Reg. 889/2008: hazard statements are not taken into account.

Table 3: Hazard statements defining unwanted properties in the context of the FiBL and EASY-CERT Input Lists.

A) Hazard statements relating to human health					
H300	**H310**	**H317**	**H330**	**H334**	**H340**
H350	**H350i**	**H360**	**H360F**	**H360D**	**H360FD**
H360Fd	**H360Df**	**H370**	**H372**		
B) Hazard statements relating to impact on the aquatic environment					
H410	**H411**				

2.4 Products for animal care

Background

Animal care products[10] are not regulated in the EU organic legislation. Based on the objectives and principles of organic farming, FiBL and EASY-CERT have developed separate approval criteria for these products. Animal care products are grouped into the main category of cleaning, disinfection and hygiene products. Not all national lists contain animal care products.

Application of requirements

- *Unwanted substances*: the requirements of chapter 2.2 apply.
- *Substances with unwanted properties*: the requirements of chapter 2.3 apply, with the exception of aspects relating to aquatic toxicity.
  - the hazard statements H410 and H411 are not taken into account.

2.5 Products for stable hygiene, bedding materials

Background

Some national lists also contain products that are used as bedding materials or applied onto bedding materials. Such products are included in the main category of products for cleaning, disinfection and hygiene. However, these products fall into the border zone between disinfection, hygiene, parasite control, feed and fertilizers. Such products are not explicitly covered by the Annexes of Reg. 889/2008.

Application of requirements

To ensure consistency with the objectives and principles of organic production, FiBL and EASY-CERT apply the following policy: Depending on the purpose and mode of action of an individual product, the evaluation team will decide case by case which set of the basic admission criteria is appropriate to be applied. The general legislation must be respected as applicable (e.g. the feed law). In the following, the FiBL policy is illustrated for selected types of products.

2.5.1 Bedding materials

Bedding materials are typically composed of materials such as straw, wood chips or cellulose pellets. Such products are normally evaluated according to the criteria for fertilizers, soil conditioners and crop management tools.

[10] Under the heading 'products for animal care', FiBL and EASY-CERT group products such as products for cleaning, disinfection and care of teats, products for the care of fur and claws.

2.5.2 Products for stable hygiene

Disinfectants for bedding materials and other products not classified under the category 'bedding materials' are pooled under the denomination 'products for stable hygiene'. Due to the variable nature of the products in this category, different sets of criteria may be applied in individual cases. Where possible, the criteria developed for products for cleaning, disinfection and hygiene will be applied.

3. Compliance with general legislation

The FiBL and EASY-CERT Input Lists require products to comply with the relevant general EU and national regulations. In the context of cleaning, disinfection and hygiene, the following aspects are particularly relevant:

- Products with a disinfecting effect must be registered in compliance with biocide legislation.
- For products which are not registered as disinfectants, no claims of a disinfecting effect may be made.

It is the responsibility of the applicant company to comply with the general legal requirements. FiBL and EASY-CERT reserve the right to verify the information provided by the applicant in this regard as part of its internal quality assurance. If there is insufficient evidence of compliance with general legislation, the listing may postponed until the applicant has demonstrated legal compliance.

4. Recommendations for use

It is the responsibility of the applicant companies to ensure that the recommendations for use of their products given on product labels, technical sheets, publications and websites are consistent with organic farming practices. If the national evaluation teams suspect that a product is intended for a use that does not comply with organic farming practices, they may postpone inclusion into the list or remove the product from the list until the applicant has amended the recommendations for use accordingly.

Impressum

Publisher:

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