

To consultative bodies

Your ref.

Our ref.
2019009/1.1.3

Date
09.10.2019

Consultation proposal concerning revised criteria for Nordic Ecolabelling for Copy and Printing Paper including the Basic Module and Chemical Module for Paper Products

This consultation is also relevant to manufacturers of tissue paper and other paper products since these Nordic Ecolabelling criteria refer to the Basic and Chemical Modules.

The proposed criteria have been prepared by representatives from the Nordic Ecolabelling offices under the leadership of Niina Tanskanen. Please contact the Norwegian office if you wish to receive a hard copy of the documents and/or a list of the bodies consulted.

What has been changed?

In the Criteria for Copy and Printing Paper:

- The requirement for energy (O3) has been tightened.
- A new requirement for information to consumers regarding sorting of packaging has been introduced (O5).

In the Basic Module:

- Regarding the requirement for fibre raw material (O7), the limit of certification has been increased from 30% to 70%. The limit value for fibre raw material originating from plantations such as acacia and eucalyptus is, however, 100%. For recycled material, the limit is 70%.
- Requirements for energy (O9) and emissions to water/air (O11), have been tightened.
- The requirement for emissions of greenhouse gasses (O10) has been changed. In this revision, the greenhouse gas requirement only encompasses fuels used for production of process heat and not electricity as in the previous generation. See also Appendix 5 in the background of the Basic Module, where Q&As regarding the greenhouse gas requirement are presented more closely.
- The requirements for inspected paper have now been introduced in the Basic Module and can be found in Appendix 1. Inspected paper is approved by Nordic Ecolabelling and meet the requirements for paper that can be used by Nordic Swan Ecolabelled printing companies.
- Some new pulp/board types have been introduced in the Basic Module, namely kraftliner, testliner, Wellenstoff, semichemical fluting and regarding pulps, NSSC (neutral sulphite semi chemical). The aforementioned types of pulp and board are used in production of

corrugated board and subsequently, can be used by Nordic Swan Ecolabelled printing companies.

In the Chemical Module:

- Requirement O1 has been expanded with further hazard classes and hazard statements.
- There is a new requirement for prohibited substances (requirement O2), such as substances on the Candidate list shall not be ingoing substances in chemical products used in the production of pulp and paper. Subsequently, some former requirements are removed, such as the requirement concerning residual monomers, as these are now included in the new requirement.
- The definition of ingoing substances and impurities in chemical products has been updated, but the limit for impurities in the chemical product remains as 100 ppm.

We wish to highlight the following points

Regarding the Basic Module:

- Please note that the list of prohibited tree species has been on open consultation during spring 2019 and will be decided by upon by the Nordic Ecolabelling Board during autumn 2019. Therefore, no comments can be left for the list of prohibited tree species in this consultation of the Criteria for Copying and Printing Paper.
- The limit values set on the emissions of greenhouse gasses. If you have comments on these levels, please explain your objections by specifying which kind of fuel you use, and why you therefore consider the suggested limits to be a problem.
- The reference values for the new pulp/board types that are introduced in the Basic Module.

Regarding the Chemical Module:

- Please note how the updated definition of ingoing substances and impurities will work in conjunction with requirement O2 in the Chemical Module. We are aware of the fact that this is a sharp limit. We would especially like your comments on how this might affect the approval of your products according to the new criteria.

We would very much appreciate your comments. We kindly ask you to send your comments to us no later than **December 11th 2019**, via the submission form on our website, by mail or by e-mail to post@svanemarket.no.

A summary of the consultation comments that are received will be available at Nordic Ecolabelling.

Best regards,
Kristian Kruse
Ecolabelling Norway