

To consultative bodies

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Date

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10.03.2022

Consultation – proposal for criteria for Nordic Swan Ecolabelling of Tissue Paper and Tissue Products, generation 6

We would very much appreciate your comments on the proposed requirements. See more at www.svanemarket.no where you also find the background document and the submission form.

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

The most important changes in the revised criteria is highlighted in the attachment.

We wish to highlight the following points:

The energy requirement (O4) and the limit value set on the emissions of greenhouse gases (300 kg/ADt) in O6 in the Criteria for the Tissue Paper and Tissue Products. 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. We also wish to gain comments on the possibility of setting a dynamic limit value for greenhouse gases that will be tightened over time.

The contact person in Norway is Kristian Kruse (phone +47 92656283 or e-mail kk@svanemarket.no). We kindly ask you to send your comments to us no later than **6th of May, 2022**, via the submission form on our website, by mail or by e-mail to post@svanemarket.no.

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

Best regards
Ecolabelling Norway



Cathrine Pia Lund
Managing director

Attachment: The most important changes compared to generation 6

Attachment: The most important changes compared to generation 6 are:

- Both the reference values for fuel (1650 kWh/ADt) and electricity (800 kWh/ADt) in the tissue paper mill have been tightened (O4). This also applies to de-inked pulp in tissue manufacturing (300 and 450 kWh/ADt), respectively.
- The requirements for greenhouse gases (O5-O6) have been tightened. There is a new requirement on fossil fuels banning the use of fossil oil and coal in production of process heat (O5). Use of natural gas is, however, still allowed. The limit value set on the emissions of greenhouse gases is 300 kg/ADt encompassing fuels and electricity used for production of process heat.
- The requirement for emissions to water and air has been tightened (O7), both the reference values for specific emissions but also the individual score calculation (from 1.5 to 1.3).
- Limit values for chloro-organic substances in wet strength agents (WSAs) and in auxiliary chemicals have been changed (O9), and is now 3000 ppm for WSAs and 300 ppm for auxiliary chemicals.
- The requirement for tissue paper and tissue products marketed in contact with food has been changed (O11), Nordic Swan Ecolabelled kitchen towels and napkins must comply with BfR's recommendation XXXVI. Paper and board for food contact, April 2021 or more recent versions.
- For kitchen towels and napkins manufactured from recycled fibre, a maximum permitted content of total organic fluorine (TOF) and Bisphenol A, F and S has been added to the requirement Content of harmful substances and bleeding (O12).
- Requirements for packaging have been changed, primary packaging made of plastics, must consist of at least 50% recycled material (O16), after year 2025, the content of recycled plastics is raised to at least 75%. For paper packaging, the recycled content is 100%. In addition, packaging must be made from mono-materials, be recyclable and information on how to sort the packaging must be specified on the packaging (O17).

The requirements for paper products are gathered in a so-called modular system, where the Basic Module and the Chemical Module include the general requirements for pulp and paper production, including forestry. The Basic and Chemical Modules were revised to generation 3 in 2020. Revision of these modules also affects tissue paper.

Major Changes In the Basic Module, generation 3:

- Regarding the requirement for fibre raw material (O7), the limit of certification has been increased from 30% to 70% in paper. For paper manufactured from recycled fibres, the limit is at minimum of 70% or alternatively, a combination of certified and recycled fibres attaining 70%. The limit value for fibre raw material originating from acacia and eucalyptus is a minimum of 70% for pulp.
- Reference values for pulps regarding energy (Appendix 4) and emissions to water/air (Appendix 5), have been tightened. Calculation for the energy score of the paper has been changed.

In the Chemical Module, generation 3:

- Requirement O1 for classification of production chemicals has been expanded with further hazard class and hazard statement (H412).
- 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, the limit for impurities in the chemical product is 1000 ppm (0.1 w-%).