

To consultative bodies

Your ref.

Our ref.

Date

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## Consultation – proposal for criteria for Nordic Swan Ecolabelling of Grease Proof Paper, generation 5

Nordic Ecolabelling are revising the criteria for grease proof paper and we hereby invite you to comment on our proposal. The consultation proposal is sent to a wide range of consultative bodies and the input will be used actively in the further work to tighten and improve the requirements.

The most important changes compared to generation 4 are:

- The energy requirement (O5) and the limit value set on the emissions of greenhouse gases (700 kg/ADt) in O7 in the Criteria for Greaseproof Paper. 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 challenge.
- The requirement for functional properties of the product (O13). If you have comments on the suggested tests, please explain your objections by specifying what kind of test you use, and why you consider the suggested tests to be a challenge.

Proposal for revised criteria for Nordic Swan Ecolabelling of grease proof paper are published on Ecolabelling Norway's website [www.svanemarket.no](http://www.svanemarket.no) where you also find the background document, calculation sheets and the submission form. The most important changes in the revised criteria are highlighted in the attachment.

The proposed criteria have been prepared by representatives from the Nordic Ecolabelling offices under the leadership of the Nordic product manager Niina Tanskanen, Ecolabel Finland. If you have questions to this consultation, please contact our environmental advisor Kristian Kruse at [kk@svanemarket.no](mailto:kk@svanemarket.no) or by phone +47 92656283.

We appreciate your comments on the proposed requirements. We kindly ask you to send them to us no later than **30<sup>th</sup> of June, 2023**, via the submission form on our website, by mail or by e-mail to [post@svanemarket.no](mailto:post@svanemarket.no). All consultation comments will be reviewed, and a summary of the received comments will be available at Ecolabelling Norway.

Best regards  
Ecolabelling Norway



Cathrine Pia Lund  
Managing director

Attachment: The most important changes compared to generation 4

## Attachment: The most important changes compared to generation 4 are:

- Both reference values for fuel (2500 kWh/ADt) and electricity (1400 kWh/ADt) in the paper mill have been tightened (O5).
- Regarding requirements for greenhouse gases (O6-O7), there is a new requirement on fossil fuels banning the use of fossil oil and coal in production of process heat (O6). Use of natural gas is, however, still allowed. The limit value set on the emissions of greenhouse gases is 700 kg/ADt encompassing fuels and electricity used for production of process heat in the mill.
- The requirement for emissions to water and air has been tightened (O8), both reference values for specific emissions but also the individual score calculation (from 1.5 to 1.3).
- Regarding silicone treatment of paper: dodecamethylcyclotetrasiloxane, D6, (CAS 540-97-6) has been introduced in the requirement O10. Impurities of D4, D5 and D6 in the commercial product must be at concentrations below 400 ppm (0.04% by weight, 400 mg/kg emulsion). The limit value is applied to each substance separately. The sum of D4, D5 and D6 must not exceed a limit value of 1000 ppm in the chemical product.
- There is a new requirement for colourants and printing inks (O11), colourants used shall follow BfR's recommendation XXXVI. including subsequent subdocuments or EuPia's guidelines and Swiss Ordinance Annex 10.
- Greaseproof paper marketed in contact with food (O12) must comply with both BfR's recommendation XXXVI. Paper and board for food contact, April 2021 or more recent versions including subsequent subdocuments and Cefi's Food Contact Guidelines for the Compliance of Paper & Board Materials and Articles, 2019 or more recent versions.
- The requirement for functional properties of the product applicable within the industry (O13). At a minimum, the following test shall be declared depending on the product type:
  - All kinds of greaseproof paper: Oil and Grease Resistance (OGR)
  - Baking and cooking paper: Water absorptiveness "Cobb value" and "Non-stick performance"
  - Wrapping paper for hot foods: Water vapour moisture (WVM)
- There are new requirements for packaging (O14-O17): sales packaging made of paper and board, must consist of at minimum 70% certified fibres or 70% recycled material or combination of these (O14). The content of recycled material in plastic packaging must be at minimum 35%. In addition, sales packaging must be made from mono-materials (plastics), be recyclable and information on how to sort the packaging must be specified on the packaging (O17).
- Regarding labelling (O17), Information about how to sort and recycle the product after use must be in line with existing recycling possibilities in each specific country where the product is sold. This means *e.g.* that paper cannot be labelled as compostable if industrial composting is not an option in the country in question.
- Release paper has been removed from the product group.

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 Module and the Chemical Module were revised to a generation 3 in 2020. Revision of these modules also affects greaseproof paper in this revision.

## Major changes in the Basic Module, generation 3:

- Regarding the requirement for fibre raw material (O7), the required amount of certified fibres has increased from 30% to 70% in the paper.
- Reference values for pulps regarding energy (Appendix 4) and emissions to water/air (Appendix 5), have been tightened. Calculation of the energy score for the paper has been changed.

### Major changes 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 (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-%).