



## **European Eco-Label for Tissue Paper: EEB position on criteria proposal (with reference to CB criteria proposal of May 2006)**

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The EEB welcomes that the 2<sup>nd</sup> draft has taken up changes discussed during the second AHWG on February 20<sup>th</sup> 2006, in particular:

- the COD limit value (table 1 No 1 a) for recycled fibre and for tissue production have been lowered from 4 to 2 kg/ADT.
- the criterion on fibre origin (No 3) now prioritises the use of recycled fibre before certified virgin fibre.
- the addition of a criterion on softeners, lotions and additives to exclude substances from labelled products that are classified as allergenic, carcinogenic or mutagenic with risk phrases R43, R45 or/and R46.

EEB calls for the following criteria changes to be made in order to ensure a more credible EU eco-label:

1. The proposed Sulphur reference limit value for CTMP (Second Draft Proposal paper Table 1, Criterion Number 1a) should be lowered from 0.3 to 0.2, according to the limit value set in 2002.
2. The proposed Sulphur reference limit value for recycled fibre pulp (Draft Proposal paper Table 1, Criterion Number 1a) of 0.03 is too low since some plants depend on external electricity supply (not valid for those countries that have a high share of hydro electricity production). The BAT Reference Document on Pulp and Paper does not give BAT ranges on sulphur for recycled fibre and for tissue production, and no detailed argumentation has been provided for the 0.3 figure.
3. Although the limit value for AOX (Criterion No 1b) has been lowered to 0.12kg/ADT (weighted average), this is still too high since 0.05kg/ADT can be achieved if no ECF pulp is used. EEB demands the exclusion of ECF pulp in order to eliminate the emissions of chlorinated organic substances to water wherever possible as long as no studies on long-term effects are available.
4. The change in order of type of fibre for the criterion on fibre origin (Criterion No 3) is not enough to strongly require the use of recycled fibres before virgin fibres. Recycled fibre is the only acceptable material for single use products such as tissue paper, which in any case are wastes as they will never be recycled after use. Therefore EEB demands that a minimum share of recycled fibre has to be used in any production, and welcomes as a starting point the 70% figure suggested by the lead competent body.
5. The wording proposed for proof of certification of virgin fibres (No 3) is too weak: *"appropriate certificate(s) from the paper supplier showing that the certification scheme correctly fulfils the requirements as laid down in paragraph 15 of the Council Resolution of 15 December 1998 on a*



*Forestry Strategy for the EU.*" In any case, the paragraph cited is incorrect<sup>1</sup> and should make reference to Paragraph 18. Attached in Annex is alternative wording proposed previously by EEB in the development of criteria for the printed papers product group, and taking up the final phrase in Paragraph 18 of the Forestry Strategy: 'invites *the Commission to consider the possibility for further action at EU level*' by suggesting more stringent, credible and verifiable certification activities.

6. The criterion wording on non-certified virgin fibres (Criterion No 3) should be deleted as it does not meet the generic aim of using only virgin fibres from sustainable forest management, if any virgin fibre is to be allowed at all.
7. Given the use of only recycled fibres or virgin fibres from certified sources, the formula to calculate the minimum share of certified fibres (Criterion No. 3) is no longer needed and should be deleted.
8. Hazardous chemicals should be banned as long as no studies are available on long term effluent effects. Therefore EEB demands that the criterion on bleaching agents (Criterion No 4 a) shall not allow the use of chlorine dioxide.
9. Additional to the requirements proposed for softeners, lotions and additives (Criterion 4 f), a negative list should be added. See the German publication in Bundesgesundheitsblatt, volume 48, No 12 of December 2005, download: <http://www.apug.de/aktuelles/index.htm>. A copy of this will be made available to participants at the meeting on 16 May 2006. Time constraints mean that this has not been available in the writing of this position paper.
10. The new proposed wording on Product safety (Criterion No 5) does not reflect the discussion in the second AHWG. It was agreed at the AHWG meeting on 20 February 2006 that EN-ISO 15320 was to be added, to prove that the material does not include PCP. At the meeting, a representative from an Italian laboratory reported that PCP is regularly detected in the raw material. The EN-ISO method is missing in the criteria proposal and should be added.
11. Following on from the previous point, the proposed wording on Product safety also does not reflect the discussion on PCB content in the raw material. This is still a relevant concern, and in order to follow the impact reduction principle, a measuring method should be reinstated

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<sup>1</sup> The *Forestry Strategy for the European Union – Council Resolution* document cited in the draft criteria makes reference to Paragraph 15, states 'Recognises additionally the need for the conservation and protection of areas representative of all types of forest ecosystems and of specific ecological interest; notes the Community contribution to the establishment, through the Natura 2000 ecological network, of protected areas consisting of "Special Protection Areas" and "Special Conservation Areas" set up under the Birds Directive () and the Habitats Directive (), taking into account economic, social and cultural requirements, regional and local characteristics and the involvement of forest owners;'. This is not relevant to certification of sustainable forestry management, which is addressed by Paragraph 18: 'Emphasises that priority must be given to the improvement of public and consumer opinion about forestry and forest products, assuring them that forests are managed sustainably; noting that forest certification schemes are market-based instruments which aim to seek to improve consumer awareness of the environmental qualities of sustainable forest management and to promote the use of wood and forest products as environmentally friendly and renewable raw materials, and that forest certification schemes should be comparable and the performance indicators should be compatible with internationally agreed principles of sustainable forest management and furthermore should comply with conditions regarding their voluntary nature, credibility, transparency cost efficiency, open access and non-discriminatory character with respect to forest types and owners; one essential point in ensuring credibility should be the independent audit of forest management; invites the Commission to consider the possibility for further action at EU level.'



## Annex

### **Credible independent third party certification criteria**

*Credible Certification should be defined as* a process by which a third (independent) party gives written assurance that a product, process or service conforms to specified requirements. A forest certificate has to attest that the forest management reaches the specified thresholds and has to document the origin of timber. As such, and in order to provide a credible product label, it has to have two components:

1. forest auditing: inspection of forest management on-the-ground against specified standards;
2. product certification: chain-of-custody monitoring of a timber product from the forest to the consumer.

All forest certification systems have to fulfil the following basic principles and minimum requirements:

1. Achieve the two main objectives:
  - a) to improve forest management,
  - b) to ensure market access for certified wood products
3. Have national or sub-national-level quantitative and qualitative forestry standards compatible with generally accepted international principles and criteria
4. Be embedded into a global framework that provides internationally recognized, applicable and equitable standards
5. Ensure the participation of a broad range of stakeholders
6. Be voluntary
7. Ensure independent third party assessment
8. Provide objective and measurable standards
9. Be fully transparent to the parties involved and the public
10. Ensure certification at the management unit level but remain cost-effective and make all efforts to be equitable to small forest owners
11. Ensure active commitment of the managers/owners of the certified unit
12. Be acceptable to a large range of involved parties and credible to consumers, social and conservation NGOs
13. Be market driven