



European Eco-Label for Tissue-Paper Products: EEB position on criteria proposal (Commission proposal of 30 October 2006)

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The EEB welcomes the proposal sent by Benjamin Caspar of European Commission on October 30th 2006.

The EEB supports the 1st criteria option on the origin of paper fibres for EU eco-labelled tissue paper:

“100% recycled content for all tissue paper”

The reasons for opting for this criterion are:

All tissue papers are one-way products of single use, and after use the fibres can not be recycled.

The Commission's Thematic Strategy on Sustainable Use of Natural Resources (COM 2005/670) expresses as overall objective the reduction of the negative environmental impacts generated by the use of natural resources (“decoupling”), and proposes to apply life cycle thinking to achieve this aim.

The use of virgin fibres for tissue paper production would contradict this strategy. Virgin fibres represent a raw material of high value, offering the possibility to be material recycled for several times if the fibres are used for the production of recyclable products.

When Commissioner Dimas launched the Thematic Strategy on Sustainable Use of Natural Resources (along with the Thematic Strategy on Waste Prevention and Recycling, and a new Waste Strategy), he talked about creating a ‘European Recycling Society’. According to the Commission: ‘This long-term strategy aims to help Europe become a recycling society that seeks to avoid waste and uses waste as a resource.’ 100% recycled single material, single-use products such as tissue products more clearly pave the way for such a society.

Several life cycle assessments have shown that the production of virgin fibres require significantly more energy and water than the production of virgin fibres. The production of virgin fibres results in significantly higher emissions to air (from energy production) and water (from cooking and bleaching). This fact is documented in the Reference Document on BAT in the Pulp and Paper Industry (2001), stating that the COD and BOD levels (water emissions) associated with Best Available Techniques in the kraft and sulphite pulping processes for virgin fibres (pages 102 and 156) are about 10 times higher than the emissions of the recovered paper production (page 299), AOX levels are about 80 times higher for kraft pulp processes than for recovered paper production.

Assessing 100 different processes of pulp and paper production in a life cycle analysis on press paper, the German EPA Umweltbundesamt in 2000 comes to the result¹ that “it is much more environmentally friendly to produce press paper from recycled fibre than from virgin fibre”. The advantages are documented for several environmental impacts natural territory exploitation, energy requirements, global warming potential, ozone depletion potential, aquatic and terrestrial eutrophication potential, eco-toxicity and human toxicity.”

During the three Working Group meetings held on the revision of the criteria for the EU Ecolabel on Tissue Products, EEB has always brought up these arguments to define the criterion of 100% recycled fibre as obligatory to achieve the EU Flower Label. The arguments were supported by several Competent Bodies.

¹ Ökobilanz Graphische Papiere, Umweltbundesamt Berlin, 2000.



In the discussions of the Working Group nor any scientifically based argument has been brought up proving an advantage of virgin fibre use, nor any life cycle assessment. The only three arguments heard during the Working Group against 100% recycled fibre use was:

- 1) once opened the criteria for virgin fibre producers the criteria should not make the producer's group smaller again and restrict the criteria to only recycled fibres.
- 2) also the production level of virgin fibre producers should be increased.
- 3) Hygienic reasons.

These arguments are not based on the general principles of eco-label criteria. Eco-label criteria should highlight those products on the market which are proved to be environmentally friendly and sustainable. The use of virgin fibres for paper products is proven to be less environmentally friendly than recovered paper production; the use of high quality virgin fibres for a one-way single use product is not sustainable.

The background study made for the discussion of the criteria revision shows high shares of recycled tissue paper products on Eastern European markets (> 50%). These products have nowadays achieved a high quality and are accepted by users (see e.g. <http://www.piszkepapir.hu/>). Not restricting the EU Eco-label criteria for tissue paper products on recycled fibre would help virgin fibre products to capture these markets and suppress recycled fibre products. This aspect was lacking in the background study.

The eco-label should orientate consumers to sustainable products by and not have an excuse to buy non-sustainable products if these are produced on a more environmentally friendly level than the worst. If in a EU Member State like Sweden and Italy it is not common to use recycled fibre tissue products, the eco-label can support information campaigns on sustainable production and can help to push forward an environmentally sound product policy. Comments of Competent Bodies like from Sweden ("lack of recycled fibres of useful quality") do not reflect scientific figures but are simply polemic.

Hygienic reasons against recycled fibre tissue papers are of no relevance if certain substances (as prohibited by the draft criteria anyway) are not used during the production process. This is shown and proved by Austrian and German eco-label criteria for tissue paper products, which are based on 100% recycled fibre.

Remark:

The argument of the Swedish competent body that the introduction of obligatory use of a certified fibre share for labeled paper products has had the effect that label users were diminished, is wrong. Swedish competent body member had explained the lack of label users with too high costs and with the producers' argument, that no advantage or stand-alone-argument on the market was achieved as a large majority of paper products on the Nordic market was able to fulfill the Swan criteria.