Results of stakeholder questionnaire:

- Stakeholder profiles
- Scope and definitions
- Emissions to air and water
- Hazardous substances
- Energy use
- Sustainable fibre sourcing
Stakeholder profiles (56):

- Public authorities 7.1%
  - EUEB 7.1%; Government 0.0%

- Industry 75.0%
  - Supply side 5.4%
  - Intermediates 8.9%
  - End-product 37.5%
  - Multiple actor 23.2%

- Other 17.9%
  - NGO 16.1%; Buyers 1.8%
Stakeholder profiles:

- All 3 groups of interest >48%
- Popularity TP > C+GP >> NP

Lot of license holders responding

Previous experience with criteria
Scope and definitions:

- Not much opinion about NP scope and definition
- Generally in favour of the C+GP scope and definition
- Generally against the TP scope and definition
Scope and definitions (non-neutral opinions only):

- Generally in favour of the C+GP and NP scope and definition
- Generally against the TP scope and definition

<table>
<thead>
<tr>
<th>Product group</th>
<th>Amend</th>
<th>OK</th>
</tr>
</thead>
<tbody>
<tr>
<td>C+GP</td>
<td>37.5</td>
<td>62.5</td>
</tr>
<tr>
<td>NP</td>
<td>36.8</td>
<td>63.2</td>
</tr>
<tr>
<td>TP</td>
<td>61.8</td>
<td>38.2</td>
</tr>
</tbody>
</table>
Emissions to air and water:

- Harmonise emissions criteria for C+GP, NP and TP: 28.6% strongly agree, 1.8% agree, 8.9% neutral opinion, 37.5% disagree, 12.5% strongly disagree.
- Align ambition level for emissions criteria with BREF: 28.6% strongly agree, 1.8% agree, 7.1% neutral opinion, 21.4% disagree, 25.0% strongly disagree.
- Use the same flexible scoring system as used in BREF: 28.6% strongly agree, 1.8% agree, 3.6% neutral opinion, 5.4% disagree, 17.9% strongly disagree.
- Test methods in existing criteria are still suitable: 28.6% strongly agree, 1.8% agree, 7.1% neutral opinion, 21.4% disagree, 25.0% strongly disagree.
- Emission limit compliance should be based on 12 month averages but only 45d for new lines: 33.9% strongly agree, 42.9% agree, 17.9% neutral opinion, 3.6% disagree, 1.8% strongly disagree.
Emissions to air and water:

- Significant non-neutral opinions expressed about all five statements criteria (>70%) except #4 (58.9%).

- Ignoring “no opinions”…..

  - Statement #1: highly –ve (14.3% +ve VS. 57.2% –ve)
  - Statement #2: +ve (46.4% +ve VS. 32.1% -ve)
  - Statement #3: highly +ve (73.2% +ve VS. 9.0% -ve)
  - Statement #4: highly –ve (12.5% +ve VS. 46.4% -ve)
  - Statement #5: highly +ve (76.8% +ve VS. 5.4% -ve)
General feedback about Emissions to air and water:

• Emission limits should **NOT align** for TP and C+GP

• **Some support** to align ambition level with BREF, but with lowest limits

• **Lot of support** to use same flexible scoring system as BREF

• Standard test methods **need to be updated** and equivalence allowed

• **Lot of support** for compliance to be based on 12 month averages for established plants and 45 days for new or upgraded plants / production lines.
Specific comments on emission criteria:

• Suggested to keep the flexible scoring system and use lowest BREF values as reference.

• Test methods need to be updated and national equivalent standards allowed (as specified in permits for mills).

• EU Ecolabel values need to be updated to match BREF

• Preference to address energy use by a criterion on total CO2 emissions instead.

• Limits for P could be tailored based on wood source used (e.g. hardwood, softwood or eucalyptus pulps.)
Hazardous substances:

- Only hazardous substances present in the final product >0.1% should be restricted.
- Hazardous substances should be restricted based on their classification, whether they remain in the final product or not.
- A combination of the previous two approaches should be used.

- Strongly agree: 3.6
- Agree: 44.6
- Neutral opinion: 28.6
- Disagree: 12.5
- Strongly disagree: 10.7

- Strongly agree: 3.6
- Agree: 21.4
- Neutral opinion: 32.1
- Disagree: 17.9
- Strongly disagree: 21.4

- Strongly agree: 14.3
- Agree: 41.1
- Neutral opinion: 23.2
- Disagree: 21.4
- Strongly disagree: 23.2
Hazardous substances:

• Not so many non-neutral opinions for all three statements on this subject (none >71%).

• Strange because this is always a big discussion topic later.

• Ignoring “no opinions”…..

  • Statement #1: very +ve (48.2% +ve VS. 23.2% –ve)
  • Statement #2: very -ve (25.0% +ve VS. 42.9% -ve)
  • Statement #3: v.v.very -ve (14.3% +ve VS. 44.6% -ve)
General feedback about hazardous subs.:

- Overall **support** for restriction to be targeted at substances that remain in the final product.
- Stakeholders **against** criteria to restrict substances and mixtures based on their classification only.
- Stakeholders **even more against** a combined approach.
- Several stakeholders were **confused** about the questions, may be a reason for the high % of "neutral opinion" answers.
Specific comments about hazardous subs.:

- **Desire for TCF free paper and biodegradable complexing agents and no derogations for R40, R63 or R68.**

- **Derogation for DTPA cited as necessary due to lack of alternatives.**

- **Concerns about blue dyes highlighted (e.g. Copper Phthalocyanine).**

- **Big changes to existing criteria approach are NOT welcome unless these are simplifications – existing criteria are already considered difficult.**
Energy use:

- Fuel, heat and electricity consumption should be accounted for in all 3 PGs: 10.9% strongly agree, 40.0% agree, 14.5% neutral opinion, 14.5% disagree, 20.0% strongly disagree.
- If BREF is more stringent than current criteria, should align with BREF: 7.1% strongly agree, 25.0% agree, 41.1% neutral opinion, 25.5% disagree, 14.5% strongly disagree.
- Energy criteria should be harmonised across all 3 PGs: 16.4% strongly agree, 10.9% agree, 32.7% neutral opinion, 25.5% disagree, 14.5% strongly disagree.
Energy use:

• Most non-neutral opinions about statement #1 (85.5%), then statement #2 (78.6%) then statement #3 (67.3%).

• Ignoring “no opinions”…..
  • Statement #1: very +ve (50.9% +ve VS. 34.5% –ve)
  • Statement #2: very -ve (32.1% +ve VS. 46.5% -ve)
  • Statement #3: very -ve (27.3% +ve VS. 40.0% -ve)
General feedback about Energy use:

• Fuel, heat and electricity consumption need to be accounted for in the criteria somehow.

• Reservations about aligning with BREF

• Lack of support for identical limits for different PGs.
Specific comments on energy use:

- Uncomfortable with BREF alignment because it sets ranges, not single values.

- EU Ecolabel should never be below BREF for EU producers for legality, low ambition to simply align.

- TWG for BREF had problems with poor data quality

- Preference to address energy use by a criterion on total CO2 emissions instead.

- Actual values should be different for different PGs.
Sustainable fibre criteria:

- Make no distinction between pre-consumer recycled, post-consumer recycled and sustainable virgin fibres
- Sustainable fibre criteria should link directly to well established schemes like FSC and PEFC
- Criteria for sustainable fibres should directly state forest management principles and traceability requirements
- A minimum recycled fibre content should be set for each PG
- A minimum 70% content of sustainable fibres should be set for each PG, which can be met by either virgin or recycled fibres

<table>
<thead>
<tr>
<th>Statement</th>
<th>Strongly Agree</th>
<th>Agree</th>
<th>Neutral Opinion</th>
<th>Disagree</th>
<th>Strongly Disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>Make no distinction between pre-consumer recycled, post-consumer recycled and sustainable virgin fibres</td>
<td>40.0</td>
<td>27.3</td>
<td>12.7</td>
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<td>1.8</td>
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</tr>
<tr>
<td>A minimum 70% content of sustainable fibres should be set for each PG, which can be met by either virgin or recycled fibres</td>
<td>8.9</td>
<td>25.0</td>
<td>12.5</td>
<td>30.4</td>
<td>30.4</td>
</tr>
</tbody>
</table>
Sustainable fibres:

- A lot of non-neutral opinions for all five statements on this subject (all >76%).

- Ignoring “no opinions”…..

  - Statement #1: v.v.very +ve (67.3% +ve VS. 20.0% –ve)
  - Statement #2: ultra +ve (78.5% +ve VS. 8.9% -ve)
  - Statement #3: v.v.very +ve (62.5% +ve VS. 19.7% -ve)
  - Statement #4: very –ve (27.3% +ve VS. 60.0% -ve)
  - Statement #5: quite –ve (33.9% +ve VS. 42.9% -ve)
General feedback about sustainable fibres:

• Pre- and post-consumer fibres **should** be considered as equivalent to virgin fibres from sustainable sources.

• Schemes like FSC and PEFC **must** be recognised.

• SFM principles **should** be directly referenced in criteria.

• **Not a good idea** to state minimum recycled contents for each PG.

• Overall **-ve reaction** about setting a minimum 70% limit for "sustainable fibre content".
Specific comments on sustainable fibres:

- A minimum recycled content should be nuanced, i.e. at least 90% for NP is okay, at least 70% for TP is okay, but allowance should be made for low pop. density countries which do not have lots of recycled paper available to instead use 100% sustainable virgin fibre.

- Should make allowance for controlled wood.

- No extra efforts should be required by EU Ecolabel if FSC or PEFC is already complied with.

- Recycled content for NP + GP is okay, but not for TP + CP.

- Want a direct link to the EN 643 standard.