



JRC TECHNICAL REPORTS

Strategic Task Force on EU Ecolabel Uptake

Absorbent Hygiene Products

*Document prepared for
the EU Ecolabelling Board
(EUEB)*

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A. Background information

1. Key data on EU Ecolabel for Absorbent Hygiene Products (AHPs)

Scope of the product group: The scope of the EU Ecolabel criteria for absorbent hygiene products is defined within the Commission Decision 2014/763/EU as 'baby diapers, feminine care pads, tampons and nursing pads (also known as breast pads), which are disposable and composed of a mix of natural fibres and polymers, with the fibre content lower than 90 % by weight (except for tampons). The scope does not include incontinence products and medical-grade products.

EU Ecolabel criteria history: Criteria for absorbent hygiene products were established in October 2014 and the current set of criteria is valid until 24/10/2018.

History of uptake: there are currently licence holders in three countries, with two of the licences awarded in 2017:

- One (1) in Denmark (3 products),
- One (1) in Finland (2 products),
- One (1) in Sweden (14 products).

2. Link of the EU Ecolabel for Absorbent Hygiene Products to other EU policy tools

There are no EU GPP criteria that cover the types of products contained within the scope of the EU Ecolabel for AHPs. As other articles present on the EU market, they must meet any applicable requirements set out under the CLP, REACH and Biocide Regulations to ensure that they present minimal to no risk to the user.

The current EU Ecolabel criteria for AHPs allow lotions to be used in some cases. While the criteria set strict requirements on their contents, these lotions must also respect all requirements set out in the EU Cosmetics Regulation.

B. EU Ecolabel for Absorbent Hygiene Products- assessment methodology followed by the Task Force

In order to understand the market and the position of the EU Ecolabel for absorbent hygiene products, contact was made with a number of current EU Ecolabel license holders (2), other manufacturers (3), industry associations (1), consumer associations (1) and retailers (2). In the majority of cases, a phone interview (ranging in duration from 20 minutes to 1 hour) was conducted based on a set of questions developed at the beginning of the Task Force. For contacts with whom it was impossible to schedule a phone interview during the weeks allocated to the interviews, a set of questions was sent by email. To collect as much relevant data and honest opinions on the EU Ecolabel scheme as possible, anonymity was promised to all interviewees.

Desk research included a review of the previous work establishing the EU Ecolabel criteria for AHPs, product catalogues, industry publications (e.g. annual reports and articles related to environmental aspects of the industry) and company documents (e.g. press releases and product documentation).

All the data gathered was divided into themes, as follows.

Section C of the present document covers market and technical issues, product and technological trends, and environmental issues related to AHPs.

Section D of this document details the feedback received specifically on the EU Ecolabel for AHPs and how it can be improved.

Section E of the present document presents the different options that have been developed for the future of the EU Ecolabel for AHPs as part of the review process.

Possible methodological limitations include a small sample size of companies and procurers contacted for full interviews due to time constraints. As much as possible, documentation covering all of the EU28 was sought but, due to language limitations, some geographical areas (e.g. eastern EU28 states) might be underrepresented.

C. Assessment results and analysis

Acquisition of the different kinds of AHPs

Although they appear ubiquitous today, disposable diapers, feminine hygiene products and nursing pads are relatively new inventions that have benefited from advances in technology and increased disposable income. It is estimated, that diapers for a single baby can cost between 325 and 1080 euros annually in countries such as France, women will spend over 100 euros annually (for 20-30+ years) for period related products and, depending on the person, nursing pads may be used for several months costing between 5 and 20 euros a month.

As for all types of products, there are low-cost unbranded products which will cost slightly less and luxury versions which will be out of the price range of most consumers. Moreover, for each of these disposable products, there are reusable and semi-reusable alternatives that have a higher up-front cost but claim to cost cheaper over the product's lifetime. They do, nevertheless, cause more dirty laundry and cannot always be safely used and stored in their used state.

AHPs are worn close to the skin for extended periods of time and consumers will pay attention to health related claims and will generally remain loyal to a brand if they find one that has good performance and minimises rashes. In terms of environmental claims, some brands choose to advertise that they use materials of sustainable origin (e.g. FSC-certified materials) but they will also advertise reduced/recyclable packaging and lower overall product weight to show lower environmental impact.

Absorbent hygiene products are also bought in bulk by such institutions as hospitals (e.g. NICUs, maternities) and prisons. Currently, environmental considerations appear to be very limited in large procurement tenders, with very few countries having established national GPP criteria (e.g. Sweden).

Evolution of trends and technology

The basic technology behind disposable diapers and feminine hygiene products has not drastically evolved the last five years but rather product range have expanded with extra options such as vitamin lotions in diapers (to cause fewer rashes) and the ever increasing market of scented products. The industry has also invested in "greening" the image of disposable products by including more sustainable materials, minimising the environmental impact of production and distribution and comparing the impact of disposable AHPs to that of other products and processes. Over the years, some companies have also made efforts to increase the amount of biodegradable parts in diapers – although no 100% biodegradable diaper could be found to be present on the market today. At the moment, the super-absorbent polymer granules remain non-biodegradable, and no alternative has been found to be as efficient in terms of absorbency and retention.

Moreover, the recycling of used disposable AHPs is still not frequent although some companies have popped up and work closely with local authorities, baby and childcare centres, hospitals, nursing homes and sanitary installation management companies. As this is new technology and energy intensive, some sources claim that it is still expensive and should potentially be paid for by special taxes on AHPs.

The concept of recycling is nevertheless very interesting in the context of circular economy and plastic strategy, also considering that absorbent hygiene products are amongst the 10 most frequently found items on the beach that contribute to marine litter.

In terms of sales, the AHP industry is looking to penetrate even more developing markets as currently AHPs are already currently used by 95% of the targeted population in Europe.

Other ecolabels and certification schemes

On the European market, Nordic Swan have recently updated their criteria for sanitary products that include nursing pads, diapers and feminine hygiene products along with many other types of products. In each category, multiple companies and products have been awarded a growing number licences, showing the popularity of the product groups and ecolabelling scheme. No other pan-European or worldwide certification scheme could be found focusing on the environmental performance of AHPs.

Some components of diapers, such as cellulose fluff pulp is often third party certified (e.g. FSC) and the related certification logos are included along those of ISO Type I ecolabels, when applicable. Furthermore, in order to showcase the fact that they have committed to lowering the environmental impact of their manufacturing process, some companies have opted to buy and use renewable energy and also join "climate neutral" schemes (e.g. myclimate).

Communication/consumer awareness

From an environmental point of view, the environmental impact of AHPs is a concern to consumers but monetary and health considerations and brand loyalty can easily win over environmental issues. From a simplistic point of view, reusable diapers are seen by some consumers as being more environmental friendly as they do not generate as much solid waste at the end of their life even though studies have shown that there are environmental downsides to both disposable and reusable diapers, with no clear winner.

In recent years, issues related to harmful chemicals (carcinogens, biocides and fragrances) in baby products and women's hygiene products have been widely covered in publications aimed at consumers.

D. Analysis of EU Ecolabel criteria

Overall EU Ecolabel perception in the industry

The industry appeared to be much more familiar with the Nordic Swan than the EU Ecolabel scheme, perhaps due to its longer presence on the market and to higher brand recognition. Moreover, it was pointed out that for some products such as diapers, green public procurement should be used more to promote the EU Ecolabel as it has greater leverage than most parents who only have to buy diapers for 2-3 years per child.

EU Ecolabel criteria

Overall, no parts of the criteria were considered as too difficult to understand and/or fulfil by the majority of interviewees, including the user tests. In some cases, the documentation for criterion 11 (on social aspects) might be difficult to obtain due to the complexity of the supply chain.

In some cases it was pointed out that the EU Ecolabel could be strengthened, such as for the criteria on fibres and lotions and fragrances. Indeed, as the cellulose pulp fibres present in AHPs represent a very small amount of the overall fibres used worldwide, it was proposed that the EU Ecolabel could have strong environmental claims if it required all pulp to be certified FSC/PEFC. Concerning lotions and fragrances, although some consumers prefer scented products, it is possible to develop products without them and their absence can be used as a marketing tool.

Limited uptake of EU Ecolabel and potential steps to increase it

The current EU Ecolabel criteria for AHPs have only been existing for three years and have not benefitted from any promotion. Several promotional avenues are available for this product group within the EU Ecolabel scheme:

- Green Public Procurement – whereas parents will only buy diapers for a couple of years and women will only purchase feminine hygiene products every 3-4 weeks, institutions buy continuously in bulk. These purchases can have a large influence on the design of products.
- Publications aimed at consumers – publications aimed at new parents and those aimed at women should be approached with ideas.
- Industry conferences and symposiums.

E. Options for the EU Ecolabel for Absorbent Hygiene Products

The following options are proposed for the future development of the EU Ecolabel for AHPs, in light of the assessment of the market, the position of the EU Ecolabel on that market, and the interest from industry in the EU Ecolabel.

Option 1 – Withdraw the EU Ecolabel criteria for absorbent hygiene products.

Pros:

- Resources can be used for PGs that are more successful than this one.

Cons:

- The Scheme loses a PG that has a lot of non-exploited potential (This is a new product group that has only been active for 3 years.)

Option 2 – Keep the product group and wait for the definition of a Strategy for the EU Ecolabel to decide whether to further revise this PG in the future. Prolong the current set of EU Ecolabel criteria for absorbent hygiene products until 31/12/2021 and launch the revision beginning 2019.

Pros:

- Product with a short life-time associated to both environmental and health considerations, used frequently by a large portion of the population, associated to environmental and health issues in the mind of consumers, with a good potential for lower environmental impacts.

- There are licence holders and we have been informed of other interested ones. It is assumed that European market leaders not previously interested in the EU Ecolabel may be more and more interested in it as a proof of their environmental efforts, and engagement in circular economy.
- There is great potential for promotional and communication activities to increase interest of potential applicants, consumers and procurers in the EU Ecolabel.
- The technology, while evolving, has not seen any drastic changes since 2014. However interesting developments in recycling disposable AHP make this PG very interesting in the context of the circular economy and plastic strategy. Recyclability is an aspect to be further investigated in the next revision, which should be carried out as soon as possible in order to keep the momentum high.

Cons:

- Considerable efforts are required in terms of communication and promotion to increase the success of the PG.