

## TABLE OF COMMENTS

**Consolidated feedback related to the revision of EU Ecolabel criteria for the printed paper product group (Commission Decision 2012/481/EU<sup>1</sup>) and converted paper product group (Commission Decision 2014/256/EU<sup>2</sup>).**

*Table contains the comments copied directly from feedback provided by stakeholders to DG JRC on BATIS and via other means. The comments have been anonymized and ordered by sections.*

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<sup>1</sup> Commission Decision No 2012/481/EU of the European Parliament and of the Council of 16 August 2012 establishing the ecological criteria for the award of the EU Ecolabel for printed paper, available online at: <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32012D0481>

<sup>2</sup> Commission Decision of 2 May 2014 establishing the ecological criteria for the award of the EU Ecolabel for converted paper products (notified under document C(2014) 2774) Text with EEA relevance. <https://publications.europa.eu/en/publication-detail/-/publication/ae7cce99-ea68-11e3-8cd4-01aa75ed71a1>

## General comments

| Subject  | Comment   | JRC response  |
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| <b>Structure of the document</b>                           | We will recommend that all definitions are listed the same place. It is not clear why there are two lists   | <b>ACKNOWLEDGED</b>   |
| <b>Definitions</b>   | We did not find definitions for the following terms (which should be defined). <ul style="list-style-type: none"> <li>o Printed paper</li> <li>o Carrier bags, eg should be clear that these types of products shall not be single use products</li> <li>o Gift wrapping paper, new product introduced hence a definition is needed, and clearly that these products are not food contact material</li> </ul>   | <b>ACKNOWLEDGED</b>   |
| <b>Definitions</b>   | Definitions (17) p. 4: VOC should not be defined with a boiling point but with a vapour pressure according to the Industrial Emissions Directive as all suppliers of inks and varnishes have adapted its software programmes to the IED definition for delivery of potential VOC data to their customers. Solvent Management Plans (mass balances) are based on this data. The wording of the IED in Article 1 (45) is: “‘volatile organic compound’ means any organic compound as well as the fraction of creosote, having at 293,15 K a vapour pressure of 0,01 kPa or more, or having a corresponding volatility under the particular conditions of use”   | <b>ACKNOWLEDGED</b>   |
| <b>Assessment and Verification: on – site inspection</b>   | It shouldn't be optional for the competent bodies to carry out on-site inspections. It should be stated in the criteria document whether an on-site inspection is required or not in order to ensure an adequate quality of the verification of compliance.   | <b>REJECTED:</b><br>The decision to conduct or not an on-site inspection needs to be taken by respective competent body based on case-by-case analysis. It is therefore proposed to maintain the following wording:<br><br><i>Where appropriate, competent bodies may require supporting documentation and may carry out independent verifications or on-site inspections to check compliance with these criteria</i> |
| <b>Assessment and Verification: on – site inspection</b>   | There is no harmonisation for the verification and inspections of EU Ecolabel criteria. To secure a level playing field, it should be considered to harmonise the rules for verification and inspections across Member States. Experience shows that verifications and inspections vary significantly from one country to another, as do licencing costs.   | <b>REJECTED:</b><br>See above   |
| <b>Assessment and verification - Product line approach</b> | We welcome the inclusion of this paragraph which clarifies how competent authorities can deal with product lines: <i>An application can be submitted for a specified product type group such as e.g. glued brochure of 2-30 pages. In the application, all chemicals, types of paper and other components that may be used in the printed or converted matter, the maximum number of pages, the maximum format, all possible types of binding must be specified. The EU Ecolabel can be used for all subsequent products that comply with the defined criteria for the sample product. Any change in the production process that is addressed by the criteria should be notified to the competent body being a subject of the further evaluation.</i> | <b>ACKNOWLEDGED</b>   |
| <b>Assessment and verification - Product line approach</b> | We support the product line approach which will make the application process easier for the applicants.   | <b>ACKNOWLEDGED</b>   |

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| <p><b>Assessment and verification</b></p> | <p>In principle this suggested solution will work but it needs some modifications, especially on how the different types are used in the communication from the printer.</p> <p>Type 1 the product line is well described and will be a good basic for a verification and the ongoing dialogue between a printer and the CB. By doing this it is clear which products can be offered as ecolabelled to costumers and will also ensure a lot of flexibility to printers. Type II should be defined as the specific products which shall be ecolabelled. If the specific product is covered by a "product line" defined in Type I then the verification is simple and can be done quickly. The critical points is how Type I and Type II is communicated. We will like to suggest we used the same approach which is already agreed among CB's.</p> <p>Type I is used in the application and verification process. The outcome is a well-defined product line or type of products which be the basis for the labelling of specific products. These overall product types (or product lines) is only used internal in the printing house, as a basis for the verification and as a basic for the dialogue printer/costumers (which type of product can the printer offer as ecolabelled). The Type I can not be marked externally, and will not be listed on the contract nor will it be listed in ECAT.</p> <p>Type II will be as all other ecolabelled products. Specific and will be available on the marked, eg the name of a magazine. These products will be listed on the contract and shall be listed in ECAT.</p> <p>We suggest this information is clearly described in the User Manual, not in the Annex</p> | <p><b>ACKNOWLEDGED</b></p>   |
| <p><b>Assessment and verification</b></p> | <p>Is shall be clearly defined in each of the requirements whom are to provide declaration or other kinds of documentations. A sentence "etc. as appropriate" might be ok is this section but will not work anywhere in the Annex</p>  | <p><b>ACKNOWLEDGED</b></p>   |
| <p><b>Transition period</b></p>           | <p>The transition period should be 12 Month as normal. We do not see any arguments to having 18 month. If the User manual including needed declaration is ready when the criteria are published we or our license holders will not have any problems renewing the licenses within 12 month. Having 18 month will only postpone the time license holders will apply, hence no advantages for the CB's.</p>  | <p><b>REJECTED:</b></p> <p><b>18-months timeframe is given to allow time to Converted Paper producers to find EU Ecolabel certified substrate and to stimulate the paper market, Until now the converted paper product could prove the compliance with substrate requirements. Therefore, the prolonged transition period has been considered necessary.</b></p> |
| <p><b>Transitional period</b></p>         | <p>Intro (13) + Article 7 (4): A transitional period of 18 month is way too long. We would suggest a transition period of 6 or 12 month.</p> <p>We understand that there is a certain period of time needed to adopt the processes for the industry but meanwhile we would like to prevent misunderstandings of the quality of the EU Ecolabel products.</p>   | <p><b>See above</b></p>  |
| <p><b>Transitional period</b></p>         | <p>Intro (13) and Article 7 (4.): Why allow using the existing criteria another 18 months? Better 6 or 12 months.</p>  | <p><b>See above</b></p>  |
| <p><b>Validity period</b></p>             | <p>The validity period of 8 years is too long. At the meeting is was argued that this is not a fast mowing technology, but in our experience, this is not correct. The printing houses are getting bigger, and order sizes are getting smaller (less copies), hence a shift in technology and perhaps substrate is foreseen. We see more and more digital printing which can produce in high quality, and still having less production costs. And we also see a new type of digital printing where ink/toner now</p>   | <p><b>REJECTED:</b></p> <p><b>8 years is proposed based on the data collected on the overall validity of PGs, when considering all the</b></p>   |

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|                        | contains higher amount of VOC and also other problematic ingredients. How to deal with this new type of printing technology is not dealt with in this proposal, hence a shorter validity period is needed. We propose a validity of 6 years.  | <b>prolongations needed in the past. Fixing 8 years timeframe does not mean that the revision cannot start earlier, if needed.</b> |
| <b>Validity period</b> | Intro (11): Validity period until 31 December 2028 is way too long. We would suggest a validity period of 5 years until 2025. We understand that the commission is interested in a realistic time frame, but prolonging of the period increase the likelihood that a further delay in updating the criteria could occur. Further on we expect that technological changes are very likely in the next years. | <b>See above</b>   |

## Scope

| Subject   | Comment   | JRC response  |
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| <b>Non-paper components</b>   | Non-paper components" is a term defined in EN 643 referring to loose non-paper materials due to collection and handling of paper for recycling. Terminology "non-paper product parts" should be used in context with paper based products   | <b>ACCEPTED</b>   |
| <b>Non-paper components</b>   | The proposal of the JRC is to allow a maximum of 10% plastic material in the final product, with an exception for stationery products (maximum 13%) and books (maximum 20%). We would need to have more explanations about the reason why there is such a distinction in the thresholds between stationery products and books. According to our industrials, even if books have a longer lifetime, books are less mistreated than notebooks. We would prefer to support a harmonization between the thresholds for the different product types tending toward plastic reduction. It is important to consider the controversy around plastic and the actual political positions at French but also European level to reduce plastic production and use.        | <b>ACKNOWLEDGED</b><br>Once a notebook (or any stationery product) is used, the product ends its life cycle; on the other hand, a book can be read multiple times.  |
| <b>Non fixed inserts</b>  | The stakeholder does not support this regulation.<br>Define a threshold, above which all products which are delivered in one pack must have the ecolabel. The threshold can be relatively high, e. g. 50% by weight. Install a question in the application form whether the product applying for the ecolabel is designed to carry inserts and brochures and if yes, whether their content will typically be higher than the threshold.<br>There are print products on the market which have an ecolabel and are designed as carrier for brochures. If these inserted brochures are not required to have an ecolabel, it is misleading for consumers. An example is "Einkauf Aktuell" in Germany, a free TV guide, as carrier of brochures.                   | <b>REJECTED</b><br>The inserts are very variable (material and formats) and there is not a fixed number of inserts. Moreover, inserts could be manufactured by different producers being provided to the printer in the ready-to-use form. The applicant has a limited capacity to verify the compliance with the criteria. |
| <b>Inserts</b>  | The stakeholder supports the text as it is proposed, which corresponds to the current situation.  | <b>ACKNOWLEDGED</b>   |
| <b>Clarification of the text: products excluded from the Decision</b> | Clarify the list: The list includes on the one hand exclusion from the scope (a, c and d) and on the other hand materials that should not be used (b and e). Consider splitting the list into 2 parts: The product group shall not include the following products: (a), (c), (d); The products shall not contain the following materials: (b), (e).   | <b>ACCEPTED with comment</b><br>Wording have been adapted to address products and materials   |
| <b>Metal content</b>  | Request of metal weight We propose to replace this sentence:<br>"The metal weight cannot exceed 30 g per product except for suspension files, folders with metal fasteners, ring binders and lever arch files having a filing capacity of up to 225 sheets where it can be up to 50 g and except for lever arch files having a filing capacity of more than 225 sheets, where it can be up to 170 g."<br>By this one:<br>"The metal weight cannot exceed 30 g per product except for suspension files, folders with metal fasteners, ring binders and lever arch files having a filing capacity of up to 225 sheets where it can be up to 80 g and except for lever arch files having a filing capacity of more than 225 sheets, where it can be up to 170 g" | <b>ACCEPTED with comment</b><br>Based on the data collected metal content is proposed to be increase to 75g   |
| <b>Packaging products</b>   | Printed paper products used for packaging should be included.   | <b>CLARIFICATION</b><br>Considering the information collected during the revision of  |

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|   |   | the product group, packaging products are excluded from the scope with the exemption of gift wrapping paper and paper carrier bags.   |
| <b>Terminology</b>                                    | The terms used are not consistent. In 4) the term “paper wrapping and gift paper” is used. In a) the term “gift wrapping” is used. We recommend to use gift wrapping, see comments below.   | REJECTED<br>The term used to refer to these products was wrapping paper.  |
| <b>Clarification of the definitions</b>               | Gift wrapping shall be clearly defined, in order not to include packaging for food which is to be in food contact.  | PARTIALLY ACCEPTED<br>The definitions are already included: see the ACT of the Commission Decision (in the link: <a href="https://susproc.jrc.ec.europa.eu/Converted_and_Printed_paper_products/docs/ACT_clean.pdf">https://susproc.jrc.ec.europa.eu/Converted_and_Printed_paper_products/docs/ACT_clean.pdf</a> )  |
| <b>Clarifications of the definitions</b>              | We did not find definitions for the following terms (which should be defined).<br>- Printed paper<br>- Carrier bags, eg should be clear that these types of products shall not be single use products<br>- Gift wrapping paper, new product introduced hence a definition is needed, and clearly that these products are not food contact material  |   |
| <b>Non-paper components: 20% of plastic threshold</b> | <p>Since few years, the children usage is to use more notebook with plastic covers. The reason is for the resistance of notebook in order to last all the school year in good condition and they can to store document in one product. With a plastic cover, the notebook keeps its functionality longer for the whole school year. With the plastic folder, documents are stored and protected.</p> <p>Until now, pupils use an additional product to notebook as such a plastic cover to over protect their notebook and a 3-Flat Folder to store document. For instance:</p>  <p>To replace these 3 products (fiber notebook + plastic protection + Folder = overall environmental footprint), the market has developed the notebook with plastic cover and folder at the back. It's the best seller products for Back-to-School. The evidence of this usage evolution is the decreasing of sales of plastic protection for notebook by 10% per year. Today, most of pupils use these new products. It's a high visibility potential for EU Ecolabel. This market trend is not “nice to have”, it's a pre-requisite if you want to keep your market share.</p> <p>If there is no possibility to have EU Ecolabel on these products, producers will be obliged to certify its products PEFC or FSC because nobody cannot stop producing this product. Moreover, FSC/PEFC certification is the easiest solution for producer as FSC/PEFC are less demanding throughout the product life cycle.</p> <p>So the consequence of this situation is:</p> <ul style="list-style-type: none"> <li>- 3 in 1 products FSC/PEFC won't be environmentally friendly for the whole life cycle.</li> <li>- The use of plastic won't be reduced at all.</li> </ul> <p>If we consider the Life Cycle Assessment as base of thinking, we must consider the notion of usage “one-year writing notes in a notebook in proper condition and store of document” and to integrate 3 products. Environmental footprint of 3 separated products is higher than environmental footprint of notebook with plastic cover and folder.</p> <p>Changing the threshold from 13% to 20% will increase the environmental footprint (single score) only to 5,8%. See calculation comparison below between 13% of plastic and 20% of plastic.</p> <p>Notebook with 80 sheets of paper:</p> | <p><b>CLARIFICATION</b></p> <p>In the 2<sup>nd</sup> AHWG Meeting it was discussed and the conclusion was that the percentage of 13% will be maintained by notebooks.</p> <p>There are other alternatives in the market that are more sustainable than the notebooks with plastic covers, and these products should be promoted.</p> <p>Regarding the book category, the usage of the book has to be seen from a reuse perspective, and not only considering the storage of the book for 10 years. Once a notebook is used, the product ends its life cycle; on the other hand, a book can be read more than one time, expanding their lifespan considering the number of readers of the book.</p> <p>The plastic threshold for printed matter has been set to 10%. "...For the products referred to in points (a) (Printed products) the plastic component cannot exceed 10% for books, catalogues, booklets or forms...." .</p> |

|                      | Paper  | PP      | TOTAL  |                      | Paper  | PP     | TOTAL  |
|----------------------|--------|---------|--------|----------------------|--------|--------|--------|
| % of weight          | 87     | 13      | 100    | % of weight          | 80     | 20     | 100    |
| weight g             | 400    | 60      | 460    | weight g             | 400    | 100    | 500    |
| single score / kg    | 0,418  | 0,268   |        | single score / kg    | 0,418  | 0,268  |        |
| Product single score | 0,1672 | 0,01608 | 0,1833 | Product single score | 0,1672 | 0,0268 | 0,1940 |

In reading book category, it's allowed to have 20% plastic.  
*The JRC mentioned that stationery products (notebook) have a shorter life span than i.e. a book, and for this reason the content of non - paper parts is lower (only 10% for stationary products, a book could achieve 20%).*  
 This argument is not acceptable face to Life-Cycle-Assessment principle. We must consider the resistance of the product compare to its usage and not compare to the time the product is kept. Notebook must resist to nomad usage in a school bag and the opening-closing several times per day even if the notebook is devoted to being used "only one" year. For book perspective, the usage is different. Even if you read and then store your book during 10 years in a library, the 10 years constraint of resistance for static use for a book is less than one-year constraint of resistance for nomad use. So, the 20% of plastic for a book is not justified but 20% is justified for notebook.

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| <b>Labels</b>  | The stakeholder agrees to keep the exclusion of labels. Most of the time, labels weight less than 0,1% w/w of products and the contribution to environmental footprint is not significant. During the recycling process, the percentage of these labels won't be higher than 0,1%. So the risk to disturb the recycling process is not significant. Moreover, laboratory test for INGEDE 12 are carried out for products containing these labels. If the test is ok, so this means that there is no risk for recycling.<br>The only acceptable limit is to provide a threshold weight of labels for which this exemption applies. | <b>ACCEPTED</b> with comment<br>Due to the effect of labels during the recycling process, formation of stickies and loss of pulp, they are required to fulfill the criteria for Adhesives Removability if they consist of 0.50 % w/w or more of the final product. The threshold was set based on comment received after the 1 <sup>st</sup> AHWG Meeting. |
| <b>Definitions</b>   | Gift wrapping shall be clearly defined, in order not to include packaging for food which is to be in food contact   | <b>ACCEPTED</b>  |
| <b>Scope</b>   | Article 1a: Products should consist at least 90 % of paper, paper-board or paper-based substrates, no exception with 80 % for "books, catalogues, booklets or forms"! What do they have in mind with this? Books, catalogues with plastic cover? Only adhesives and binding materials will not be 20 % of the total weight! In the Technical Report, no data or arguments are provided for a higher percentage than 10 % for printed products (see p. 32 bottom). Plastic folders used to store and protect documents (mentioned in the Technical Report on p. 32) are converted products, not printed products.                  | <b>CLARIFICATION:</b><br>In order to harmonise requirements that refers to the maximum plastic content across different products it is proposed to establish additional threshold of 10% w/w plastic content for books, catalogues, booklets or forms.   |
| <b>Scope</b>   | Article 1a: The following sentence is unclear; probably it is meant "10 % of the total product weight", not 10 % of the non-paper materials. If this is meant, this should be written instead: "For books, catalogues, booklets or forms that shall consist of at least 80 % by weight of paper or paperboard or paper-based substrates and for products referred to in point (d), the plastic component cannot exceed 10 % except for  | <b>ACCEPTED</b><br>10 % of the total product weight is considered  |
| <b>Scope</b><br><b>Single use bags to be excluded form the scope</b> | The phrase "Please reuse this bag" is not supported by any requirements. We propose to include the following in the to the definition of "paper carrier bags" (Article 1, point 8): "Paper carrier bags made for single use purposes are not included".   | <b>REJECTED:</b><br>It is not feasible to verify/prevent that a "paper bag" is not single-use? In principle each paper bag could be used only once and we cannot verify the user behaviour. This is why we are informing the user to reuse the bag (Criterion 9).  |

## Criterion 1: Substrate

| Subject   | Comment   | JRC response  |
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| <b>Compliance check for non EU Ecolabel certified substrate</b> | Decision on option 1 about cardboard substrate, instead of option 3 which was supported by the French Competent Body<br>For paper substrates, we ask to maintain the current requirement for EU Ecolabel certification of the substrate. Concerning cardboard substrate, it is not possible to require only EU Ecolabel certification for the substrate. We strongly ask to | <b>CLARIFICATION:</b><br>Following the EU Ecolabelling Board feedback collected after the EUEB Meeting in June 2019, the paper substrate should |

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|   | <p>reconsider this option by presenting during the next EUEB the full context. Our comments on the revision of the EU Ecolabel criteria for printed &amp; converted paper - After the AHWG meeting - November 2019 and the consequences that this decision could have on the durability of the EU Ecolabel on converted paper products. For instance, Hamelin Group is the only licensee in France and in Europe; such a decision will question their ability to maintain their certification. To remind some elements of context, it seems difficult to enforce EU Ecolabel certification of the substrate mainly because of the typology and number of cardboard substrate manufacturers. Indeed, the main suppliers of cardboard substrates are mainly packaging producers. As packaging products can't be certified, packaging producers have no interest to enter in a certification process for their other smaller activities like cardboard substrate production. Thus, applying this requirement for only EU Ecolabel certified cardboard substrate will make easier for products with plastic covers to obtain EU Ecolabel (because there no requirement on plastic used in the 13% authorized) than product made from only paper/cardboard materials. However, we need to specify and clarify the verification process of the proofs of conformity of these suppliers by identifying and listing the supporting documents to demonstrate compliance with the criterion to avoid any interpretation by CBs and companies. These documents need to be indicated in the user manual (mention of forms and reference documents).</p> | <p>meet the specification of Option 1, as follow:<br/> <i>The paper substrate used in converted and printed paper products shall have been awarded the EU Ecolabel for "Graphic paper, tissue paper and tissue products" in accordance with Commission Decision (EU) 2019/70</i></p> |
| <p><b>Compliance check for non EU Ecolabel certified substrate</b></p>                  | <p>Some JRC proposals could question the EU Ecolabel certification for the only licensee at both French and European level (Hamelin Group) for stationery product. We would like to stress that the consequences of the current proposed criteria (especially for substrate) need to be clearly and thoroughly discussed during the next EUEB with all competent bodies to ensure they have all the key elements in mind to take a decision. To this date, it seems that given that Hamelin Group is a French licensee, the other competent bodies do not have a full picture of the situation and consequences with the proposed criteria. "</p>   | <p><b>CLARIFICATION</b><br/> See above</p>   |
| <p><b>To allow also the use of substrate certified with other ISO type 1 labels</b></p> | <p>We would like to repeat our position that the availability of substrate is one of the key elements that will decide the success or failure of this product group. The suggested proposal, only permitting EU Ecolabeled paper will limit the availability of a variety of different paper qualities and this will hinder the success of this product group. We regret this since there is an obvious and easily implementable solution, eg. allowing other ISO type 1 labels. We have only a few relevant Type 1 Ecolabels, we can only identify two which is relevant in this content: The Blaue Engel and the Nordic Swan Ecolabel. It would be a relatively simple task to compare these two labels with the EU Ecolabel in respect to the most relevant requirements like:</p> <ul style="list-style-type: none"> <li>fiber requirement,</li> <li>chemical requirements</li> <li>Energy requirements</li> </ul> <p>If these two labels will be considered equal by the EUEB based on the suggested analyze the availability of different paper qualities will increase, and the verification will be very simple for the CB's – only a certificate will be needed.</p>   | <p><b>CLARIFICATION:</b><br/> See above</p>  |
| <p><b>To allow also the use of substrate certified with other ISO type 1 labels</b></p> | <p>We would like to repeat that the availability of substrate is one of the key elements that will decide the success or failure of this product group. The suggested proposal will limit the availability of a variety of different paper qualities and this will hinder the success of this product group. We regret this since there is an obvious and easily implementable solution, eg allowing other ISO type 1 labels.</p>   | <p><b>CLARIFICATION:</b><br/> See above</p>  |
| <p><b>No EU Ecolabelled cardboard available.</b></p>                                    | <p>"For printed products: referring to the 80/90% threshold of paper content, consider allowing in the remaining 20/10% non EU Ecolabelled paper/board material. In other words, the EU Ecolabelled printed paper product should include 80/90% of paper-based EU Ecolabelled content and 20/10% of other material or non-EU Ecolabelled paper-based material. Similar to some converted paper products, some printed products (i.e. hard cover books) may include cardboard (i.e. cover) which is not supplied as EU Ecolabelled.</p>  | <p><b>CLARIFICATION:</b><br/> See above</p>  |
| <p><b>To use EU Ecolabel Product Catalogue as documentation for</b></p>                 | <p>It should be an option to use the public EU Ecolabel Product Catalogue as documentation for compliance with this requirement. It is stated that the applicant shall provide a copy of a valid EU Ecolabel certificate for each paper substrate. It will make the application process easier for the applicants if it was an option to use the public EU Ecolabel Product</p>   | <p><b>CLARIFICATION:</b><br/> Requiring a copy of certificate from an application is perceived the most effective and time efficient</p>   |

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| <b>compliance</b>   | Catalogue as documentation for compliance with this requirement. If a paper substrate is registered in the public database it should be as valid a proof of the certification as a copy of the certificate. By accepting this approach, the competent bodies might be more encouraged to register paper substrates in the public database which will also help to raise awareness to the ecolabelled products in general.   | communication with the competent bodies.  |
| <b>A link to ECAT (the EU Ecolabel Product Catalogue) should be allowed as proof of compliance.</b> | Consider the following wording: "The applicant shall provide a copy of a valid EU Ecolabel certificate or the link to the ECAT catalogue... To allow for a quicker procedure, it should be allowed for the printer to give the link to ECAT, if available, to prove that its input material has the EU Ecolabel licence.  | <b>CLARIFICATION:</b><br>See above  |
| <b>Use of EU Eco-labelled substrate</b>   | "We support that the substrate must be EU Ecolabelled. It is the only correct way to go both strategically and practically.   | <b>ACKNOWLEDGED</b>   |
| <b>Criterion 1 Substrate</b>  | <p>We still supports a requirement that under, specific conditions, will include other Type 1 labels. The JRC/Commission have been presented to workable solutions and the only argument given at the meeting to reject these was these proposals were rejected by most member states.</p> <p>The Countries that have issued the majority of the licenses and products certified were nevertheless supporting solutions including other Type 1 labels – we think this should carry more weight since they know the market situation much better from the dialogue with their customers. The feedback we get from our license holders is that availability of suitable paper substrate is the key parameter to be able to make EU Ecolabelled products.</p> <p>Having listened to the intention from the Commission to collaborate more with other Type 1 labels, and also ensuring more uptake we see this proposal to be a missed opportunity. Including other Type 1 labels will clearly indicate a willingness to more mutual collaboration and will clearly give a better possibility for more products to be EU Ecolabelled.</p>   | <p><b>REJECTED:</b></p> <p>The proposed solutions implies, besides providing another ISO Type 1 certification, the need to prove compliance with the requirement on fibres and on chemicals. The compliance check was not considered as an easily implementable solution. If this were the case it would have then been better to leave opportunity to prove compliance with ALL the Criteria (as proposed by option 3) that was rejected by the EUEB.</p>  |
| <b>Criterion 1 Substrate</b>  | <p>As a follow up of the EU Ecolabel Board Meeting held on 18 and 19 February 2020 in Brussels, FSC would like to support the Criterion 1 in the annex as stated below:</p> <p>“Criterion 1 — SubstrateThe paper substrate, including board and cardboard, used in a final product shall bear the EU Ecolabel for “Graphic paper, tissue paper and tissue products” in accordance with Commission Decision (EU) 2019/703.</p> <p>Assessment and verification: the applicant shall provide the specifications of the products concerned, including the trade names and amounts of paper used. The list shall also include the names of the suppliers of the papers used.The applicant shall provide a copy of a valid EU Ecolabel certificate for each paper substrate used in a final product according to Annex I to Commission Decision (EU) 2019/70.”</p>  | <b>ACKNOWLEDGED</b>   |
| <b>Criterion 1 Substrate</b>  | <p>The JRC decided in the technical report n°3 to choose option 1 about cardboard substrate, instead of option 3 which was supported by the French Competent Body To remind some elements of context, it seems difficult to enforce EU Ecolabel certification of the substrate mainly because of the typology and number of cardboard substrate manufacturers. Indeed, the main suppliers of cardboard substrates are mainly packaging producers. As packaging products cannot be certified, packaging producers have no interest to enter in a certification process for their other smaller activities like cardboard substrate production. Thus, applying this requirement for only EU Ecolabel certified cardboard substrate will make easier for products with plastic covers to obtain EU Ecolabel (because there no requirement on plastic used in the 13% authorized) than product made from only paper/cardboard materials.</p> <p>For paper substrates, we ask to maintain the current requirement for EU Ecolabel certification of the substrate.</p> <p>Concerning cardboard substrate, the technical report n°3 did not reconsider the criterion despite the alerts made by the French competent body. Indeed, it is not possible to require only EU Ecolabel certification for the substrate. We strongly</p> | <p><b>REJECTED:</b></p> <p>The selection of the option that the paper substrate should be awarded EU Ecolabel license in accordance with Commission Decision (EU) 2019/70 is in line with the feedback of EU Ecolabelling Board collected after the EUEB Meeting in June 2019. DG JRC recommended the compliance check for the paper substrate verification</p> <p>Finally yet importantly, it cannot be proven that the board producers won't apply for the EU Ecolabel certification now, as it is possible for them. This is also why we propose a longer transition period.</p> |



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|  | <p>asked in our previous comments to reconsider this option by presenting to all of the competent bodies the full context and the consequences that this decision could have on the durability of the EU Ecolabel on converted paper products. This was not done during the last EUEB. As Hamelin Group is the only licensee in France and in Europe; such a decision will question their ability to maintain their certification. This asks the question or whether the JRC wants a “perfect” EU Ecolabel with no licensee and no product in this sub-product group (choosing option n°1) or a more realistic and achievable one (option n°3) that will actually encourage and support products with a reduced environmental impact in the common market.</p> <p>Finally, we need to specify and clarify the verification process of the proofs of conformity of these suppliers by identifying and listing the supporting documents to demonstrate compliance with the criterion to avoid any interpretation by CBs and companies. These documents need to be indicated in the user manual (mention of forms and reference documents).</p> |  |
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## Criterion 2: Excluded or limited substances and mixtures

| Subject                                      | Comment   | JRC response  |
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| <b>Criterion 2 – General typing</b>          | The term “and /or” shall be avoided. It is not possible to verify this wording. Either you want the declaration, or you want the SDS – or you want both. In each case this shall be clearly stated. For all chemicals (formerly known as consumables) today we will need a declaration AND an SDS to verify the requirement.  | <b>ACCEPTED</b>   |
| <b>Criterion 2 Hazardous substance</b>       | <p>The verification for chemicals shall always be a MSDS and a declaration. It can never be only a MSDS, hence the term and/or should be eliminated in the wording.</p> <p>In 2e “dyes” have been erased from the requirement. This should be included since this requirement is also relevant for dyes. The declaration shall be given by the producer of the chemical (they have the knowledge) and not the applicant, as stated in 2e.</p>   | <p><b>ACKNOWLEDGED:</b></p> <p>The reason for the and/or was actually the fact that some chemicals might not actually have a MSDS (i.e. no obligation to produce one, which can happen in the following case according to Article 31 of the CLP Regulation: “...4. The safety data sheet need not be supplied where substances that are hazardous in accordance with Regulation (EC) No 1272/2008 or mixtures that are dangerous in accordance with Directive 1999/45/EC, offered or sold to the general public, are provided with sufficient information to enable users to take the necessary measures as regards the protection of human health, safety and the environment, unless requested by a downstream user or distributor....”</p> <p>In those cases, we would need a declaration from the chemical supplier. But both can also be provided as well, hence the and/or.</p> |
| <b>Criteria 2(a) and 2(b)</b>                | <p><i>“This criterion does not apply to chemicals used for wastewater treatment unless the treated wastewater is recirculated back into the printing or conversion process.”</i></p> <p>The sentence is very odd. What it says is that It is correct to use SVHC substances in the water treatment as long you let them out from the printing house. That is not what the consumers expect from production of EU Ecolabelled printed paper.</p> | <p><b>ACCEPTED</b></p> <p>A new and more restrictive approach is now being taken for SVHCs, where they are being screened out at the level of ingoing chemicals (the same approach is being proposed in parallel for EU Ecolabel Hard Coverings)..</p>  |
| <b>Criterion 2(a) – Restrictions on SVHC</b> | <p><i>the product, and any component articles therein, shall not contain substances or mixtures in concentrations greater than 0.1 %</i></p> <p>How does this work in practice? How does a printer count the amount of a restricted chemical in a printed product before printing? If a dangerous chemical is for example a dye? Use of the dye depends on pictures and text to be printed.</p>   | <p><b>ACCEPTED</b></p> <p>A new and more restrictive approach is now being taken for SVHCs, where they are being screened out at the level of ingoing chemicals (the same approach is being proposed in</p>   |

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|   | <p>The printers don't always even know if there are SVHC substances present in there are several inks containing less than 0.1% SVHC each. The EU Ecolabel compliance must be shown before the printing</p> <p>I hope that you explain in detail what the printer must do and what a CB must do to verify that the requirement is fulfilled.</p>  | <p>parallel for EU Ecolabel Hard Coverings). This way there is no need to estimate potential SVHC content in the final product..</p>  |
| <b>Criterion 2(a) – Restrictions on SVHC</b>                            | <p>How can the printer calculate the amount of inks in the printed paper before the printing is done? All printed paper products contain different amounts of inks and especially for the magazines the content is different for every number. Printers don't always even know if there are SVHC substances present in there are several inks containing less than 0.1% SVHC each. The EU Ecolabel compliance must be shown before the printing</p>   | <p><b>ACCEPTED</b></p> <p>A new and more restrictive approach is now being taken for SVHCs, where they are being screened out at the level of ingoing chemicals (the same approach is being proposed in parallel for EU Ecolabel Hard Coverings). This way there is no need to estimate potential SVHC content in the final product..</p>   |
| <b>Criteria 2(a) and 2(b) – Horizontal approach</b>                     | <p>The level of verification or screening needs to be clarified. Today the basis for verification is the chemicals which are to be found in the printing house (defined as consumables, e.g. inks, adhesives). This was the basis, but ingoing substances were also evaluated, and verified up against their specific classification limits.</p> <p>We suggest keeping the verification on this level. Looking at the figure 8 the verification is done at a substance level. The difference is illustrated below:</p> <ol style="list-style-type: none"> <li>1. An ink classified H410 – calculation is needed</li> <li>2. An ink is not classified but contains H410. According to our proposal no calculation is needed. According to the proposal a calculation is needed.</li> </ol> <p>In our opinion the proposal will lead to a lot of calculations, but most likely none show a presence in the final product above the 0,1%. Hence, we suggest keeping these requirements simple, and add other requirements for specific chemicals if needed, as for biocides.</p> | <p><b>ACCEPTED</b></p> <p>See above</p>   |
| <b>Criterion 2(a) – Restrictions on SVHC</b>                            | <p>Verification of the content of SVHC. Here it is not likely that a MSDS will be enough to verify the limit - hence "or" should be replaced by "and".</p>  | <p><b>ACCEPTED</b></p> <p>See above</p>   |
| <b>Criterion 2(b) – Derogation request from industry: Mineral oils.</b> | <p>Handling the ink itself should pose no risk, because in the case of most inks (e.g. heatset, coldset) the inks themselves are not classified as H304, since they do not meet the criteria for classification. So, the risk is only relevant for the ink manufacturers, where extensive occupational safety measures are in place.</p>  | <p><b>ACCEPTED</b></p> <p>The text has been modified in line with the explanation provided in the comment</p>   |
| <b>Criterion 2(b) – Derogation request from industry: Mineral oils.</b> | <p>As explained in the AHWG meeting, there are obviously differences between coldset and heatset. In coldset the mineral oils are absorbed into the paper substrate, while in heatset a major part is evaporated. However, also in heatset a certain residual amount remains in the paper. Since it is hardly possible for the printer to control, whether the 0.1% criterion is fulfilled or not, the derogation needs to be kept for heatset.</p>   | <p><b>ACCEPTED</b></p> <p>No further change to the mineral oil derogation has been made</p>   |
| <b>Criterion 2(b) – Derogation nickel</b>                               | <p>Nickel derogation</p> <p>Considering the different impacts represented by nickel treatment on health (causing skin allergies, cancer and having impacts on organs via repeated and prolonged exposure) and environment (chronic toxicity to aquatic environments), it would be interested to have more inputs on existing alternatives and to promote it. Could JRC bring information about alternatives to nickel treatments of metal components and maturity of the market to innovate on this point?</p>  | <p><b>CLARIFICATION</b></p> <p>The standalone criterion for nickel restrictions has been removed (now only a derogation in criterion 2b). Nickel electroplating was found to be the major treatment applied to metal components used in paper stationery products. The main alternatives would be coating with nickel-chrome or zinc, both of which have similar environmental issues. The application of a plastic coating is also possible, but would essentially be the use of plastic that is impossible to recycle in the future due to the nature of the application.</p> |
| <b>Criterion 2(b) –</b>   | <p>But the derogation condition for nickel is not applicable to stationery products as such. The nickel in stationery products is</p>   | <p><b>CLARIFICATION</b></p>   |

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| <b>Derogation nickel</b>  | not hazardous for the skin as there is no prolonged contact with the metal part included in the stationery products. We propose to delete this derogation condition.  | See above   |
| <b>Criterion 2(b) – Is derogation for UV inks and varnishes needed?</b>   | As already explained in the 2nd AHWG meeting, no derogation for UV inks is needed.<br><br>UV inks are reactive and hence the substances classified are chemically changed. Indeed, the pigments are not changed during the process, however, it is correct that the classification has nothing to do with the pigments.   | <b>ACCEPTED</b><br>The derogation for UV inks and varnishes has been removed, because it is understood that any classified ingredients in these formulations is chemically modified during processing to non-classified products  |
| <b>Criterion 2(b) - Any other derogation requests foreseen? Especially considering the H317 hazard and any pigments?</b>  | Indeed, after carefully checking the criteria, we think a derogation for H317 would be sensible (see derogation request).<br><br>The hazard no longer applies to the final product (see derogation request).  | <b>ACCEPTED</b><br>No formal derogation has been received, but if the substance does not remain in the final product, it is irrelevant since it would not be restricted in the first place by criterion 2b).  |
| <b>Criterion 2(c) – Biocidal products - Is it appropriate to refer to the BfR recommendations in this criterion? Any potential conflict with the application of the Biocidal Products Regulation?</b> | “To delete the reference to BfR recommendation XXXVI, add other PTs (such as PT11)Of course, the BfR recommendation is not in conflict with the BPR, since the BPR is a mandatory law, which must be respected by the BfR, as well. In fact, a significant part of criterion 2(c) only repeats the legal obligation of the BPR. However, referencing the criteria of the BfR recommendation XXXVI makes absolutely no sense. Furthermore, one should consider not to restrict the criteria to PT6 and to exclude other PTs (such as PT11)<br><br>The BfR recommendation is for food contact materials (FCMs). Since food contact is out of scope of the ecolabel it makes no sense to demand those criteria. Even if FCMs were in scope, it would be very strange to demand FCM-based criteria only for the biocides. | <b>ACCEPTED</b><br>The BfR recommendation XXXVI refers to food contact materials, and this is out of the scope for this EU Ecolabel. This reference can be removed.<br>JRC considers that PT11 and PT12 should not be restricted to this criterion and need to be included.   |
| <b>Criterion 2(f) Printing inks and related products</b>  | Our experience is that in the new modern printing technologies the used inks may need very small amounts additives that will react and change form. To not stop the use of modern technologies and development of them perhaps the following sentence should be introduced in the criterion:<br><br>“The use of substances or mixtures that are chemically modified during the production process so that any relevant restricted CLP hazard no longer applies shall be exempted from the requirement”  | <b>REJECTED</b><br>This would be a big step away from the current approach of industry best practice (the EUPIA exclusion policy) and would result in potential unforeseen consequences (who decides when a printing technology or variation is "modern"?)  |
| <b>Criterion 2(f) Printing inks and related products - Can Cobalt be banned for inks in all the relevant printing technologies that apply?</b>  | Cobalt is not allowed in the Nordic Swan and it seems to work out fine without it in the industry.<br><br>Cobalt should not be allowed in the EU Ecolabel as well.  | <b>CLARIFICATION</b><br><u>To be discussed further</u> , especially with Blue Angel representatives to know if they will also be moving to a phase-out of Cobalt-based drying agents and with CBs representing existing license holders. Cobalt is used in drying agents. However, most cobalt dryers are already classified (or in the classification process) so that they would not meet the criteria. |
| <b>Criterion 2(f) See above</b>   | Considering the significant divergence in heavy metal restrictions between the EuPIA exclusion policy, the EU Ecolabel, the Blue Angel and the Nordic ecolabel criteria, how best to align? Should all restrictions be grouped together to be as ambitious as possible or might this lead to unintended consequences? Can Cobalt be banned for inks in all the relevant printing technologies that apply? Cobalt is used in drying agents. However, most cobalt dryers are already classified (or in the  | <b>CLARIFICATION</b><br>See above   |

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|  | classification process) so that they would not fulfil the criteria.  |  |
| <b>Criterion 2(f)<br/>Printing inks and related products – Azo dyes from Appendix II</b> | <p>Due to the fact that the indicative list of restricted azo dyes in Appendix II is much larger (aligned with previous EU Ecolabel research on this subject for textiles and furniture) than the list of five azo dyes specifically mentioned by the EuPIA exclusion list, the larger list must be cross-checked with ink suppliers to the paper and board printing industry.</p> <p>We carefully checked the list in appendix II and we are of the opinion that these azo dyes can all be restricted.</p>  | <p><b>ACCEPTED</b></p> <p>Thank you for the effort in cross-checking these azo dyes with your members.</p>   |
| <b>Criterion 2(g)<br/>Toluene recovery from rotogravure printing</b>                     | <p>The reference to 'closed loop' should be deleted because it refers to a specific recovery technique which is no more a BAT according to the BREF as it requires too much energy.</p>  | <p><b>ACCEPTED</b></p> <p>The requested changes have been incorporated into the revised version.</p>   |
| <b>Criterion 2(g)<br/>Toluene recovery from rotogravure printing</b>                     | <p>Toluene is a big issue, especially in rotogravure printing, so a standalone criterion is considered necessary. Recovery of toluene is possible in rotogravure because it is a mono-solvent process, does the use of multiple solvents in other printing processes really impede their recovery?</p> <p>Obviously, the use of several solvents makes recovery more difficult as a complex distillation procedure would be needed. However, the reason that recovery is only an issue for rotogravure is different and depends on the physics/chemistry of the ink: In heatset the solvent is evaporated and used to fuel the dryer, in coldset the oils are absorbed into the paper substrate, in oxidatively drying and UV-curing inks the solvent is incorporated into the ink film. Hence, in all these cases a recovery would neither be possible, nor make sense.</p>   | <p><b>ACCEPTED</b></p> <p>Thank you for the additional technical explanations in response to the JRC question.</p>   |
| <b>Criterion 2<br/>Hazardous substance – Mineral oils</b>                                | <p>Proposal for a new criterion 2(h): Mineral oils (hydrocarbons) in printing inks</p> <p>To foster the developments of new inks, the use of specific mineral oils should be restricted under the EU Ecolabel.</p> <p>In order to avoid unhealthy contamination during the reuse of the paper fibres, the following requirements should be obligatory:</p> <p>In the case of aliphatic hydrocarbons, only those substances with a chain length of C10 to C20 may be used. In addition, the following high-molecular compounds without solvent properties may be used if they have a carbon number C &gt; 30 and the proportion of those with a carbon number of C20 to C30 does not exceed a maximum of 1.5%: microcrystalline waxes, Vaseline, polyolefin waxes, paraffin waxes or Fischer-Tropsch waxes.</p> <p>Only those printing inks in which less than 1 % by mass of aromatic hydrocarbons from mineral oil are used as constituent ingredient should be used for printing the printed matter. In addition, the defined limit values for PAH that are regulated in EU Regulation No. 1272/2013 are valid.</p> <p>There can be an exception for coldset web offset printing inks until the 1 January 2021.</p> <p>Compliance verification</p> <p>The applicant shall verify compliance with the requirements by submitting a declaration from the manufacturer of the printing inks and varnishes. In addition, the applicant shall ensure that the manufacturer of the printing inks and varnishes submits information about the ingredients used in the formulations for the printing inks to the competent body.</p> | <p><b>ACKNOWLEDGED WITH COMMENTS:</b></p> <p>A derogation request for mineral oils and distillates with the H304 classification was submitted. It was explained that mineral oils are used as solvents and help to optimise the behaviour of the ink for different printing techniques. In heatset processes the mineral oils are mostly evaporated in the drying process but in coldset processes, a larger fraction of the mineral oils will remain absorbed to the paper substrate.</p> |
| <b>Criterion 2<br/>Hazardous substance – Derogation Ni</b>                               | <p>Criterion 2b) Table 1, p. 6: Exception for H304 can be accepted: it is a production related hazard (as no longer contained in the final product) and would exclude relevant products for printing, in particular in publication rotogravure (toluene) and in offset printing (cleaning agents). Exception for nickel (H317/H351/H372) has to be accepted as we couldn't prove that alternatives to nickel plated binder materials are available in Europe. =&gt; Add in concluding remarks that this should be assessed in the next revision!</p>   | <p><b>ACKNOWLEDGED</b></p>   |

## Criterion 3: Recyclability

| Subject                                   | Comment   | JRC response   |
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| <b>Criterion 3 a)</b>                     | It was mentioned that 3(a) would be extended to printed products. Intergraf is in favour of maintaining criterion 3(a) as it is. If it was to be extended, exemption should at least be foreseen for products like staples . Do not extend the requirement 3(a) to printed products. If extension, a list of exemption should be provided. Extending the 3(a) requirement to printed products will represent a disproportionate requirement for printed products that may for instance only use staples. As the paper recycling representative acknowledged at the meeting, staples in printed products do not represent a problem for recycling. A systematic declaration of compliance would be an excessive requirement. | <b>ACCEPTED:</b><br>Small non-paper elements such as staples or envelope windows are proposed to be exempted from the requirement.   |
| <b>Wet strength agents</b>                | We do not support to exempt printed products from the requirement on wet-strength agents. It is known that the vast majority of printing paper are produced without using any wet-strength agents. A relatively easy solution can be that the paper manufacturer has to confirm that the paper is made without any wet-strength agent to exempt it from testing.  | <b>ACCEPTED</b>  |
| <b>Lamination - life span</b>             | What documents are needed to verify that the life span is increased with 1 year?  | <b>CLARIFICATION:</b><br>This refers to books, binders, folders, exercise books, calendars, notebooks and diaries. Lamination shall not be used in magazines, paper carrier bags, or wrapping paper.   |
| <b>Criterion 3 Repulpability</b>          | Criterion 3b) p. 10: Deletion is good: "Printed matter is exempted from the requirement" as it is better to ensure that wet strength agents are not used neither in printed matter (although little probability).   | <b>ACCEPTED</b>  |
| <b>Adhesives removability</b>             | For water-based adhesives a declaration of the water-based nature of the adhesives shall be provided by the manufacturer. It not clear what this declaration should document. If the only purpose of the declaration is to state whether the adhesive is water-based it should be an option to refer to the safety datasheet where it's often is stated if the adhesive is water-based.   | <b>ACCEPTED</b>  |
| <b>Adhesives removability</b>             | Removability with a score of at least 71 is supported.  | <b>ACCEPTED</b>  |
| <b>Criterion 3 Adhesives removability</b> | Criterion 3c) p. 11: Good that "at least 71 on the EPRC Adhesive Removal Scorecard"   | <b>ACKNOWLEDGED</b>  |
| <b>Deinkability</b>                       | According to JRC proposal, recyclability criteria is essentially based on deinkability performance of products to optimize quality of recycled paper through their whiteness. It is important to note that deinkability processes includes additional environmental impacts (energy and water consumption, chemicals use...). In addition, all papers are recyclable and recycling industrials make their own recipes in order to produce the quality of paper needed. The pertinence of using deinkability for recyclability criteria could be questioned. Could the JRC bring more inputs on consumer expectations in terms of the whiteness of recycled paper?"  | <b>CLARIFICATION:</b><br>Deinkability is only one of the requirements addressed under the Recyclability Criterion. The Commission Statement on the revision of the EU Ecolabel for Converted paper urges for having a criterion on de-inkability. Feedback from recyclers have identified the deinkability aspect of printed or converted paper products as an important factor for the recycling of graphic paper. The aim of this criterion is to address the properties of paper for recycling intended for deinking that is fed into the graphic paper production line. Obtaining recycled graphic paper of high quality is in line with the circular economy policy.<br>ISO 12647 introduces a set of standards that specify values and tolerances needed to normalize different printing |

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|   |   | processes. This included ISO Brightness requirements for different printing techniques or printed matter.   |
| <b>Deinkability – test</b>  | Testing of printing technologies or inks must be performed on three types of paper: uncoated, coated and surface-sized paper. Require a specification of the paper if it is a special grade and consequently grant the ecolabel only for print products on these special papers (in our experience, this can be limited to inkjet printing). In case of inkjet, there are papers which have a special surface-sizing or coating for inkjet printing. These treatments often support deinkability. There might be a huge difference in deinkability between prints on these special papers to prints on standard surface-sized or coated papers.   | <b>ACCEPTED:</b><br><i>Testing of printing technologies or inks must be performed on the paper type(s) that is used in a product.</i>   |
| <b>Deinkability – test</b>  | Testing only needs to be performed on the paper used for the EU Ecolabel product. Testing on 3 paper grades does not provide added value for the achievement of the criterion.  | <b>ACCEPTED:</b><br>See above   |
| <b>Deinkability - verification</b>  | Some questions: How common is it nowadays that an ink supplier has this information available? Is there somewhere a list of laboratories doing inkability tests? How many laboratories do these tests and where in Europe?<br><br>Could it be good to give the applicant a possibility to show compliance with the deinkability criterion by a declaration from the DIP producer?   | <b>CLARIFICATION:</b><br>The identified standard methods for assessing the deinkability is in line with the EPRC “Assessment of Printed Product Recyclability, Deinkability Score”. ISO 21993:2020(en) Paper and pulp — Deinkability test for printed paper products is based on INGEDE Method 11.<br>Mill operations cannot be defined as precise as lab tests and mills are not operating exactly the same way. It is therefore not possible to introduce equivalency between mill test results and a lab test results. |
| <b>Deinkability - verification</b>  | "Our experience is that the INGEDE method is very difficult to pass and the printing houses are not able to deliver the test results. There are far too many inks used in a printing house. The tests must be done by the ink producer and we would like to accept a statement from the company who carries out the deinking.   | <b>Partially ACCEPTED:</b><br>Either the applicant or ink manufacturer is proposed to provide a declaration of compliance with deinkability scores according to the guidelines of the European Paper Recycling Council (EPRC).<br><br>Mill operations cannot be defined as precise as lab tests and mills are not operating exactly the same way. It is therefore not possible to introduce equivalency between mill test results and a lab test results.   |
| <b>Deinkability – verification. Toe use of pilot trial data as evidence of deinkability</b> | Do not allow pilot plant tests as evidence for deinkability. We do not support the idea of allowing pilot plant tests. It is accepted that a pilot plant test is probably more realistic than a laboratory test. But a pilot plant needs typically 200 to 1000 kgs of material, being mostly a blend of different print products from the trade of paper for recycling since producing that amount of one print product only for the pilot plant is way too costly. In addition, the few existing pilot plants are equipped and operated differently, therefore the degrees of freedom are too many for a specified test procedure.   | <b>ACCEPTED</b>   |
| <b>Deinkability – verification</b>  | We believe that one should allow alternative methods (which could include 2 loops, different chemistries, etc.) to demonstrate deinkability and recyclability, not just "equivalent" methods, as stated in the text:<br><br>We would like to stress that recycling to graphic paper is not always the best option - tissue and packaging are legitimate secondary uses for waste paper, and Method 11 is not relevant for these. Furthermore, digital printing is usually on wood-free paper and Method 11 is not necessarily applicable or the best method when this is the main paper, so there is no reason why a print should it be tested at 100%. For wood-free paper other conditions, such as neutral chemistry deinking, are used. | <b>CLARIFICATION</b><br><br>See comment above   |
| <b>Deinkability – verification. Toe use</b>   | Pilot Plant test have been performed and evidence has also been provided to the JRC   | <b>ACKNOWLEDGED</b>   |

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| <b>of pilot trial data as evidence of deinkability</b> |   |  |
| <b>Deinkability – min. score required</b>              | Minimum of 51 points in total according to the EPRC score is in line with current practice like in the Nordic Swan.   | <b>ACCEPTED</b>  |
| <b>Deinkability – min. score required</b>              | Deinkability is important, but does not need to fulfil a very high score as 50 % stands for a good deinkability already.  | <b>ACCEPTED</b>  |
| <b>Deinkability – min. score required</b>              | Clarification is needed on the interpretation of results using the Deinkability Scorecard. It should be mentioned that a print product is regarded deinkable if all individual parameters have a positive score (and not only if the total score is positive)   | <b>ACCEPTED</b>  |
| <b>Deinkability – min. score required</b>              | We support the approach to require a deinkability score of at least 50% of each individual score. This requirements makes sure that no critical print products will be rewarded with the ecolabel.  | <b>CLARIFICATION:</b><br>The majority of stakeholders recommended to stay in line with the EPRC approach. The ambition level of requiring the final deinkability score of at least 51 for each individual parameter was communicated as highly demanding when considering that EU Ecolabel criteria are based on Pass/Fail methodology<br>It is proposed to consider printed product compliant if it reaches in total a minimum score of 51 of the EPRC deinkability scorecard, based on INGEDE Method 11 results. |
| <b>Deinkability – min. score required</b>              | We strongly recommend to use option a) (51 points according to the scorecard). With this option the deinking criteria of the EU Ecolabel would pose the strictest provisions for recyclability of all ecolabels we are aware of world wide. In fact, it would not be in line with the Nordic Swan, but much stricter, since the Nordic Swan uses an overall point system.<br>We also strongly object to deviate from the current practice in industry and other ecolabels to judge the deinkability based on the score of the EPRC scorecard and to require a minimum score of 50% of the maximum score available for each individual parameter. There are scientific reasons for the use of a total score. In the scorecard states: “The assessment of deinkability consists of five parameters. Three of those – luminosity, colour and cleanliness – refer to the quality of the deinked pulp, the other two – ink elimination and filtrate darkening – are process parameters. The quality parameters have a higher maximum score than the process parameters, which serve as auxiliary parameters for the assessment.” | <b>ACCEPTED</b>  |
| <b>Deinkability UV inks</b>                            | It is not true that cross-linking in UV inks doe generally have negative consequences for deinking.   | <b>ACKNOWLEDGED</b>  |
| <b>Deinkability digital inks</b>                       | We strongly disagree with the exemption of digital prints from the deinkability criteria. Industrial deinking processes have to be designed to treat the existing input blend of paper products as good as possible. INGEDE Method 11 in its current version and in combination with the EPRC Score card are good and accepted indicators whether and how an individual print product will perform in an industrial deinking process. You cannot change the deinking behaviour of a printed product in an industrial process by changing or adapting a laboratory test method.  | <b>ACCEPTED</b>  |
| <b>Deinkability digital inks</b>                       | The requirements should be the same for all types of inks and toners. There should be no exemption for digital printing in relation to test of deinkability. When the deinkability requirements in general are tightened in the way they are, some offset printers might need to use alternative inks in order to comply. Because of this it wouldn't be fair to exempt other technologies from the requirements of tests.  | <b>ACCEPTED</b>  |
| <b>Criterion 3 Deinkability</b>                        | Criterion 3d) p. 11: Deinkability criterion „at least 51 on the EPRC Deinkability Scorecard“ => we agreed to it to enable more products to achieve the EU Ecolabel and accept on the other hand lower deinkability of some sheet fed offset products. Discussion with RAL has shown that it is also possible to achieve 71 with sheet fed offset products according to latest INGEDE tests.   | <b>ACKNOWLEDGED</b>  |
| <b>Deinkability - envelopes</b>                        | "It is not clear from this formulation that envelopes are exempted from proving deinkability.<br>We understood that the fact, that flexo inks are not deinkable (with the deinking procedures available today)[i] has been taken into account in establishing criteria limiting the inside printing of envelopes to 80% of the surface and in applying  | <b>ACCEPTED</b>  |

certain limitations (opacity/paper grade) instead. However from the current text is it not clear that envelopes are exempted from proving the deinkability of the product.

Suggestion: clarify that envelopes are exempted from deinking in the legislative text or the guidelines accompanying the legislation.

[i] Due to mechanical constraints no other than flexo inks can be used during the converting process

The industry has developed water based flexo inks that require less ink to provide the same high quality graphics as older generations of inks. These provide practical means of source reduction, complying with requirements regarding volatile organic compounds. Industry also changed to these water based inks as they do not require solvents to aid the curing and drying process, potentially affecting human health.

There do exist flexo inks today that are de-inkable. However, the composition of these inks is completely different than traditional flexo inks, requiring a more extensive cleaning with higher water usage. Furthermore, the binder used requires a higher application of water in the ink; therefore very low paper grade envelopes cannot be printed with these deinkable inks as they would buckle. For the inside printing of envelopes, flexo inks left over from the general printing processes are used in a diluted form which helps to save costs and reduce waste from inks.

## Criterion 4: Emission

| Subject  | Comment   | JRC response  |
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| <b>Structure of the criterion</b>  | We commented on the revision of the EU Ecolabel criteria for printed & converted paper - After the AHWG meeting - November 2019. Option II is based on BATs and on a European benchmark of printing industries. Thus, the thresholds described in the BAT-AEL are supposed to become mandatory in 2024, the Ecolabel would be then 3-4 years ahead by applying these thresholds from 2020-2021 (with the transitional period). But in another hand, licensees and stakeholders argue that Option II is be too demanding at the moment and are asking unanimously to support Option I.<br>The French Competent body needs more inputs from our internal experts before having a statement on this point. | <b>ACKNOWLEDGED:</b><br>Additional consultation was conducted in order to clarify the most appropriate way to formulate the criterion.  |
| <b>Structure of the criterion</b>  | The existing KPI for VOC might not be the most ideal, but we know how it works, which is very important. Lowering the threshold value from 5 kg/tonnes to 3 kg/tonnes can work but it's not very ambitious. The problem is that there are major differences in the best practice of the different printing techniques. E.g. the best heatset companies are performing a factor 10 better than the best sheetfed companies due to the differences in the production volumes and the technologies. There should be defined threshold values for each individual printing technique. If this not possible it is acceptable to lower the threshold value from 5 kg/tonnes to 3 kg/tonnes.                   | <b>PARTIALLY ACCEPTED:</b><br>For IED – installations , in order to ensure that the proposed reference values are robust, best practice oriented, and representative for the European paper industry, it is proposed to harmonise the criterion with BAT-AELs. The verification is based on mass balance approach and/or direct measurement. For non-IED installations, it is proposed to distinguish reference values in function of the printing technique used. The reference values are proposed to be developed based on Blue Angel criteria RAL-UZ 195 and feedback-collected from the current licence holders. The verification is based on mass balance approach. |
| <b>Requirement for printing installations where no legislative measure applies</b> | The proposed KPI's and threshold values works for the printing techniques covered by STS BREF. However, the proposed KPI's and threshold for printing techniques not covered by the STS BREF are not adequate. E.g. can no sheetfed companies comply with 10% fugitive emission because there is no drier or cleaning of the air and because of this the fugitive emission in sheetfed will always be 100%. BAT-AELs should not be applied for printing techniques which are not covered by the STS BREF since the proposed threshold values doesn't work.  | <b>ACCEPTED</b><br>See above  |
| <b>Structure of the</b>  | We do not have definitive position on emissions but both option would need to be adapted. If option 1: there is a need  | <b>ACKNOWLEDGED</b>   |



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| <b>criterion</b>  | to have different values for different techniques. If option 2: the basis will be the BAT conclusions for all techniques except for sheetfed offset and coldset offset. Both techniques can be used for the EU Ecolabel but are not regulated by the BAT conclusions. Separate requirements would need to be developed.  |   |
| <b>Structure of the criterion</b>                         | It needs to be clarified that it is the different printing technologies where the EU Ecolabel printed paper is produced shall fulfil the criterion separately.   | <b>ACKNOWLEDGED</b>   |
| <b>Structure of the criterion</b>                         | Our comments are based on our knowledge to heatset and sheet feed printers. We recommend sticking to option 1. This option has proved to be easy to understand by printers, and easy to verify by CB's. We do see that the option 1 does not include fugitive emissions, but since the BAT approach estimate the fugitive emissions based on the input, we really do not see the point in complicating a calculation without gaining any environmental improvement.  | <b>CLARIFICATION</b><br>For IED – installations , in order to ensure that the proposed reference values are robust, best practice oriented, and representative for the European paper industry, it is proposed to harmonise the criterion with BAT-AELs. The verification is based on mass balance approach and/or direct measurement. For non-IED installations, it is proposed to distinguish reference values in function of the printing technique used. The reference values are proposed to be developed based on Blue Angel criteria RAL-UZ 195 and feedback-collected form the current licence holders. The verification is based on mass balance approach. |
| <b>Structure of the criterion (OPTION I or OPTION II)</b> | We support the option 1 as it is written in the current standard.<br>The option 2 is not relevant for stationery products as our printing process (sheet offset) is not covered by IED. At that time, plants manage the VOC Emissions by weight balance approach that's why plants have no measurement possibility.  | <b>CLARIFICATION:</b><br>Plants not covered by IED arwere equally addressed under Option 1 and 2 as presented during the 2 AHWG Meeting.  |
| <b>Criterion 4(b) Emissions to air – VOC content</b>      | The limit may be too stringent for some digital technologies even if others may pass, based on experience from the Nordic Swan.  | <b>ACCEPTED:</b><br>Threshold for each existing printing technology will be defined in the new proposal for modification of the criterion. This information will be considered.   |
| <b>Criterion 4(b) Emissions to air – VOC content</b>      | Besides the use of fibres with low environmental impact, VOC emissions from the printing process have major impact on the environment, and therefore EU Ecolabel criteria should be ambitious for this criterion. A general level of < 3 kg VOC/tonnes of paper is not supported.<br>Setting a general level of 3 kg/tonnes of paper is ambitious for some printing processes like packaging printing and sheet-fed offest-printing but little ambitious for heatset web offset printing and coldset web offset printing. Therefore, the criterion should be differenciated according to the type of printing process.<br>A level of 2 kg/tonnes has been set by Blue Angel criteria in 2015 for heatset web offset, reducing subsequently the use of isopropanol in the process. There is a long list of licence holders able to comply the criterion (see list of licence holders of advertising inserts, printed with heatset web offset, attached), and reduction of the value to below 2 kg/tonnes is envisaged for the revision of the Blue Angel criteria in 2020.<br>Similarly, data show that for coldset web offset (mainly used for newspaper printing) there is little VOC used for dampening solution and cleaning, hence a level of 2 kg/tonnes is also justified. | <b>ACCEPTED.</b><br>For IED – installations , in order to ensure that the proposed reference values are robust, best practice oriented, and representative for the European paper industry, it is proposed to harmonise the criterion with BAT-AELs. The verification is based on mass balance approach and/or direct measurement. For non-IED installations, it is proposed to distinguish reference values in function of the printing technique used. The reference values are proposed to be developed based on Blue Angel criteria RAL-UZ 195 and feedback-collected form the current licence holders. The verification is based on mass balance approach.     |
| <b>Criterion 4(b) Emissions to air – VOC content</b>      | We support the lowered emission limits, heatset lowered from 5 to 3 kg/ton.  | <b>REJECTED:</b><br>According to the reported emissions of VOCs by license holders, the range of values for this printing technique was between 0.6 and 1 kg VOC/t paper.   |
| <b>Heatset web offset printing - Dampening</b>            | We do not support a maximum content of VOC in damping solutions. The content is unique for each printing process, and we do not have the technical insight to evaluate which limit would be appropriate. Neither do we find these  | <b>ACKNOWLEDGED:</b><br>Threshold for each existing printing technology will be defined   |

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| <b>solution</b>   | arguments in the technical report. We will recommend keeping limiting the VOC emissions using an overall method.  | in the new proposal for modification of the criterion.   |
| <b>Heatset web offset printing - Dampening solution</b>   | A specific criterion for maximum isopropanol use is not needed if the general value is reduced for heatset web offset. Otherwise, if the general value is not reduced to 2 kg/tonnes, a maximum value of 2 Vol-% is proposed. Reduce the general limit from 5 kg to 2 kg for heatset web offset printing. If this is not done, limit isopropanol use to 2 Vol-% in the dampening solution. For heatset web offset, printing with zero addition of isopropanol is possible for most installations, using a specific dampening solution substituting the properties of isopropanol. To allow compliance on older machinery, in case of introducing a isopropanol limit value, 2 Vol-% is justified. However, setting a general limit of 2 kg VOC/tonnes of paper is preferred for heatset web offset as it covers both, low-VOC cleaners and low input of isopropanol.  | <b>ACCEPTED</b>  |
| <b>Criterion 4(b) Emissions to air – limit for IPA in dampening solutions</b>                         | The possibility to include a specific limit for isopropanol, in terms of maximum concentration in dampening solutions or in terms of emission levels is also open for discussion.<br>A specific criterion for maximum isopropanol use is not needed if the general value is reduced for heatset web offset. Otherwise, if the general value is not reduced to 2 kg/tonnes, a maximum value of 2 Vol-% is proposed.<br>Reduce the general limit from 5 kg to 2 kg for heatset web offset printing. If this is not done, limit isopropanol use to 2 Vol-% in the dampening solution.  | <b>ACKNOWLEDGED:</b>   |
| <b>Monitoring</b>   | No average period is provided. Publication rotogravure emissions usually should be measured continuously due to the toluene recovery installed, hence the emission limit should refer to a daily average value.   | <b>ACCEPTED with comment:</b><br>Monitoring has been aligned with STS BREF: <i>For any stack with a TVOC load higher or equal to 10 kg C/h the monitoring shall be continuous according to EN15267-1, EN15267-2, EN15267-3 and EN 14181. For continuous measurement the data shall represent daily average over the period of one day based on valid hourly or half-hourly averages</i>  |
| <b>Criterion (4d) Printing processes not covered by the Industrial Emissions Directive 2010/75/EU</b> | Do not set an emission limit for concentration of waste gas nor for fugitive emissions for all non-IED Annex I and Annex VII installations.   | <b>ACCEPTED</b>  |
| <b>Criterion (4d) Printing processes not covered by the Industrial Emissions Directive 2010/75/EU</b> | In all cases where no legislative measures apply, the emissions of VOC to air must not exceed 20 mg C/Nm <sup>3</sup> . In addition, fugitive emissions should be lower than 10%. Do not set an emission limit for concentration of waste gas nor for fugitive emissions for all non-IED Annex I and Annex VII installations.<br>Printing processes not covered by IED Annex I nor Annex VII are:<br>1) Digital printing<br>2) Sheet fed offset printing<br>3) Cold set web offset printing if < 200 t/a or < 150 kg/a<br>4) Heatset web offset printing < 15 t/a<br>5) Publication rotogravure < 25 t/a (in practice not existing)<br>6) Other rotogravure, flexography, rotary screen printing, laminating or varnishing units < 15 t/a<br>=> Numbers 1) to 3) do not provide of a waste gas abatement system, hence it is not possible to demand compliance with a waste gas concentration limit nor less than 10 % fugitive emissions (as 100 % is emitted fugitive if not ending-up in waste)<br>It is proposed to set the following requirements for processes not covered by IED Annex I nor Annex VII are:<br>1) Digital printing: < 1 kg VOC/tonnes of paper<br>2) Sheet fed offset printing: < 3 kg VOC/tonnes of paper<br>3) Cold set web offset printing if < 200 t/a or < 150 kg/a: < 2 kg VOC/tonnes of paper<br>4) Heatset web offset printing < 15 t/a: 20 mg/Nm <sup>3</sup> and 10 % fugitive emissions | <b>ACCEPTED with comment</b><br>The threshold proposed under revised Criterion 4 (d) has been contrasted with data collected from license holders. Reference values has been developed:<br><br><i>Total VOC emissions as calculated by the solvent mass balance should be lower or equal to:</i><br><br><i>4.5 kg VOC/tonnes of paper for sheet fed offset printing;</i><br><br><i>1.0 kg VOC/tonnes of paper for digital printing;</i><br><br><i>2.0 kg VOC/tonnes of paper for heat set web offset printing;</i><br><br><i>2.5 kg VOC/tonne of paper for cold set web offset printing;</i><br><br><i>3.0 kg VOC/ tonne of paper for other rotogravure, flexography, rotary screen printing, laminating or varnishing</i> |

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|   | 5) Publication rotogravure < 25 t/a (in practice not existing)<br>6) Other rotogravure, flexography, rotary screen printing, laminating or varnishing units < 15 t/a:<br>Where waste gas treatment is applied: 20 mg/Nm <sup>3</sup> and 10 % fugitive emissions<br>Where no waste gas treatment is applied: < 3 kg VOC/tonnes of paper  | units.                       |
| <b>Criterion 4(e) Printed processes not covered by the Industrial Emission Directive 2010/75/EU (OPTION II)</b> | If we read the directive part 2 correctly this will at least apply to all feed sheets printers. Printers included here are printers with low emission (since they are not covered by the directive). To comply to this requirement printers will need to measure VOC in the outlets of the company. An additional cost with little environmental benefit –we will recommend limiting the VOC emissions by using an overall approach – a calculation.   | <b>ACCEPTED</b><br>See above |
| <b>Criterion 4 VOCs</b>   | Criterion 4b) p. 12ff: We had rumours in some cases printing houses have delivered good data for one year but do not care afterwards any longer. Therefore we should include in the criteria that the solvent mass balance has to be done every year and can be asked for by the competent body at any time; also measurement data of waste gas shall be registered and available on request for the competent body. => Include this in “Assessment and verification” on p. 13.              | <b>ACCEPTED</b>              |
| <b>Criterion 4 VOCs</b>   | Criterion 4c) p. 14: The wording and figures of the criterion are well done and should not be altered.   | <b>ACKNOWLEDGED</b>          |
| <b>Criterion 4 VOCs</b>   | While we can agree to the proposed criteria, in view of the need to ensure non-discriminatory treatment of producers outside the EU one specific criterion (VOCs emission from installations covered by the Industrial Emission Directive 2010/75) raises some prima facie questions about whether non-EU producers are not treated differently from EU producers (that are subject to the permitting requirement of said Directive), in particular in terms of assessment and verification. | <b>ACCEPTED</b>              |

## Criterion 5: Waste management

| Subject   | Comment   | JRC response   |
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| <b>Criterion 5(a) Waste management system Assessment and verification</b> | The term “sufficiently addressed” is impossible to verify. Perhaps not so important since it is difficult to imagine a certified ISO 14001 without inclusion of waste plan, since this is more than likely to me an important environmental impact.   | <b>ACCEPTED</b><br>The wording of the assessment and verification of the criterion has been changed and we have deleted the word "sufficiently". |
| <b>Criterion 5(a) Waste management system</b>                             | If this requirement is kept we suggest to include a standard waste handling plan in the User manual. This will help applicants and also ensure a common understanding at the CB's on how to verify this requirement. You can find such a waste handling plan in the Nordic Swan Ecolabel criteria document. | <b>ACKNOWLEDGED</b>  |
| <b>Criterion 5(a) Paper for recycling from printing facilities</b>        | This requirement has not lead to any changes for the 7 licenses we have. For the point i and ii there are no defined lower limit, hence all simple descriptions should be accepted. Point iii is an iteration to be in compliance with national regulation.   | <b>ACKNOWLEDGED</b>  |
| <b>Criterion 5(b) Paper for recycling from printing facilities</b>        | It is not clear from the text that the criterion in 5 (b) are NOT Applicable to envelopes. This creates confusion on whether various waste criteria need to be taken into consideration for different production steps.   | <b>ACCEPTED</b>  |
| <b>Criterion 5(b) Paper for recycling from printing facilities</b>        | What should the contractor declare? The contractor doesn't know which waste paper comes from the EU Ecolabelled product, unless there are separate waste paper management system in place.  | <b>ACCEPTED</b><br>Following text is proposed to be added: <i>When information on waste is available on the individual product level, each</i>   |

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| <b>Criterion 5(b) Paper for recycling from printing facilities</b>  | <p>This criterion shall be reworded. It is simply not possible to document for all printers. This criterion has been discussed in depth at the CB forum since it is very hard for some printers to verify – and CB’s to understand. The CB forum agreed that the average waste paper percentage for the whole company can be used as documentation if the percentage was below the limit and the printer stated that the ecolabelled product would have a lower percentage. But this is clearly not how the criterion is written. The problem is that it is not always possible to separate the waste stream for ecolabelled products from the non-ecolabelled products. This is only possible for a very limited number of printers. Hence the “X” is not possible to determine. This becomes even more difficult if the finishing is out-sourced. Products sent to external finishing might be weighed but it is likely that a shipment is a mixture of ecolabelled and non-ecolabelled products. In this criteria proposal two “types” of ecolabelled products have been introduced. It is not clear which type this requirement is aimed at. Is it the “product line” or is it the ecolabelled product itself? If kept we would like to have a clarification on how this criterion shall be verified. A “quick-fix” will be to calculate the waste percentage as an overall average for the company.</p>                         | <p><i>individual product must be below the applicable waste threshold in order for the product to be accepted into the scheme. If the information does not exist on the product level, then the company has to create a sincerity declaration indicating that they attest that all products theoretically are below the applicable threshold</i></p>  |
| <b>Criterion 5(b) Paper for recycling from printing facilities</b>  | <p>Based on our experience from the Nordic Swan we think that the limit 10% is far too stringent. You should bear in mind that this criterion is an absolute criterion and may close out most of the digital technologies if the limit is too low.</p>   | <p><b>ACKNOWLEDGED</b><br/> The threshold value of digital printing has been maintained in line with other Type I Ecolabels (Nordic Swan and Blue Angel), and data provided by stakeholders (only one stakeholder provided information and the quantity of waste paper generated is lower than 10%).<br/> No extra problems encountered to comply with the requirement has been notified by industry.</p> |
| <b>Criterion 5(b) Paper for recycling from printing facilities</b>  | <p>The proposed threshold values for paper waste are very low and will make it impossible for many printing companies to comply. The stakeholder recommends that the existing threshold values are maintained because the size of the average print job in the printing industry has decreased since the current criteria document was developed. This is important in relation to paper waste since the waste consists of partly make-ready waste and partly cutting waste. When the size of the print jobs decreases the amount of cutting waste will decrease as well but the amount of make-ready waste will remain the same. The consequence of this development is that even if the current threshold values are maintained in the new criteria document it will result in a de facto tightening of the threshold values.<br/> When comparing to the thresholds in other ecolabels it must be taken into consideration that neither the Swan nor the Blue Angel has ultimate threshold values for paper waste as in the EU Ecolabel. The proposed threshold value for heatset is 2% lower than any other Ecolabel which doesn't seem to be fair and realistic.<br/> It must also be taken into consideration that the amount of waste from the Ecolabelled production can not be measured separately. This means that the companies must document the compliance as an average of the total production on an annual level.</p> | <p><b>ACCEPTED</b><br/><br/> Following the feedback collected it is proposed to maintain currently valid reference values</p>   |
| <b>Criterion 5(b) Paper for recycling from printing facilities</b>  | <p>Maintain the threshold as in current criteria.<br/> The criteria are already becoming more challenging considering the reduction in print runs and size of printed products. Printing companies have a natural economic incentive to reduce paper waste.</p>  |   |
| <b>Criterion 5(c) Paper for recycling from stationery paper product and carrier bags production sites</b> | <p>For envelopes, 17% for the total waste is considered is too low.<br/> For envelopes, paper waste rates (data collected from 13 already certified converters, so being among the best in class) are on average 19%:<br/> Waste rates are between 15% and 23% (from roll production)<br/> Up to 27% for sheet production<br/> Average paper waste rates are 19%<br/> The paper waste (as calculated above) comes from:<br/> Packaging waste from each paper reel (rindings and kernel)<br/> Technical waste (cutting side flaps and window: 11-16%)</p>   | <p><b>ACCEPTED</b> with comment:<br/><br/> provided by manufacturers shows the paper waste rate at 19%. The proposed threshold has been revised accordingly.</p>  |

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|                          | <p>Set up (machine preparations and running waste (start/stops))</p> <p>Sheet production shall not be discriminated as the decision for the production type depends on the product ordered and is thus the customer's choice.</p> <p>Small manufacturers (with smaller runs) are discriminated with a reduction of the waste rate. Suggestion: to keep the maximum waste rate for envelopes (including the machine set up, the converting, the printing and the packaging) to 20%. Please note that all the clean white "waste paper" is going into the high level recycling stream and is thus not "wasted". We consider a good waste management as more impactful on the sustainability of a factory than the paper that not going into the final product, as it is inserted in the recycling stream.</p> <p>Furthermore, the criteria are already becoming more challenging considering the smaller runs and the challenging market situation for envelope manufacturers due to an overall volume decrease in the sector (since 2018 around -7-8% per year). You can be assured that for economic reasons envelope manufacturers are doing all they can to reduce (costly) paper waste.</p> <p>"</p> |                     |
| <b>Criterion 5 Waste</b> | Criterion 5b) p. 16: The waste percentages are okay (in Blue Angel not even obligatory)   | <b>ACKNOWLEDGED</b> |

## Criterion 6: Energy use

| Subject                           | Comment   | JRC response  |
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| <b>Structure or the criterion</b> | We support the idea to base energy requirements on the ISO 50001 certification to ensure an efficient management of energy. During the 2nd AHWG, some stakeholders argued that the certification is complicated to obtain but that we could use ISO 50001 as a standard and chose some specific requirements on ISO 50001 on which licensees should be compliant with. We support this proposal provided that the specific requirements chosen are the most appropriate ones. We then need some precisions from the JRC on the requirements chosen in ISO 50001 to confirm this statement."   | <p><b>ACCEPTED:</b></p> <p><i>The energy management plan shall include measures for the improvement of energy efficiency and shall include information on at least the following procedures:</i></p> <p><i>(i) Establishing and implementing an energy data collection plan in order to identify key energy figures;</i></p> <p><i>(ii) Analysis of energy consumption that includes a list of energy consuming systems, processes and facilities;</i></p> <p><i>(iii) Identification of measures for more efficient use of energy;</i></p> <p><i>(iv) Continuous improvement objectives and targets relating to the reduction of waste generation and the increase of reuse and recycling rates.</i></p> |
| <b>Verification</b>               | <p>In a product criteria there shouldn't be any requirements for a certified management systems but ISO 50001, ISO 14001 or EMAS should be an option for documenting compliance. A carbon calculation system like <a href="http://www.climatecalc.eu">www.climatecalc.eu</a> should also be acknowledged as compliance with the requirements of monitoring.</p> <p>ISO 50001 is not commonly used in the printing industry. Tools for CO2 calculations exist for the industry and may be referred to: ClimateCalc and bvdM CO2 geprüft (both tools are based on the Intergraf CO2 recommendations). Consider other ways to prove compliance similar to the waste criterion.</p> | <p><b>ACCEPTED with comment:</b></p> <p>The applicant shall provide a declaration of compliance for the production site, supported by a description of the energy management system. Applicants certified according to ISO 50001, EN 16247:2012 or an equivalent standard/scheme shall be considered as having fulfilled this requirement. Applicants registered with EMAS shall be considered as having fulfilled this requirement if the inclusion of energy management in the scope of EMAS is documented in the EMAS environmental statement. Applications certified according to ISO 14001 shall be considered as having fulfilled this criterion if the inclusion of</p>                            |

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|  |   | energy management plan is sufficiently addressed by the ISO 14001 certification for the production site. |
| <b>To demonstrate continuous improvement</b> | "The printing house should also be obliged to show that there has been improvement of energy efficiency due to the energy management plan."<br>"  | <b>ACCEPTED</b>  |
| <b>Threshold</b>                             | We would support a maximum threshold for each printing technology. We can also support the limits suggested in the technical report. The 14.000 kwh/t suggested for sheet feed in the technical report must be an error – perhaps it should have been 1.400 kwh/t? (Note: more than 90% of Nordic Swan certified printers will comply with a limit on 1.400 kwh/t. And all digital printers will comply with a limit on 5000 kwh/t – and the printers used is likely to be the same used in the rest of the EU as well. | <b>ACKNOWLEDGED</b>  |
| <b>Assessmetn and verification</b>           | We can support the proposal, but perhaps ISO14001 should also be accepted as verification. Since energy is a major impact this is bound to be a part of an ISO14001 certified system  | <b>ACCEPTED</b>  |

## Criterion 7: Training

*No additional comments were submitted*

## Criterion 8: Fitness for use

| Subject  | Comment   | JRC response   |
|--|---|--|
| <b>Verification of the fitness for use: ISO 9001</b> | In the printing industry it is the customers who designs the product and defines the paper quality, the size and the layout and finishing of the product. Because of this it doesn't make any sense to ask the customer to sign a declaration of compliance with fitness for use. It should also be taking into account that printing companies might have thousands of customers and producing ten thousand of print jobs every year. This stakeholder supports a requirement for an internal complaint system in the company and an acknowledgement of ISO 9001 as option for documenting compliance. | <b>ACCEPTED:</b><br>A list of alternative tools to verify the criterion was added. The applicant shall provide a declaration of compliance with this criterion supported by at least one of the following documents:<br>(i) letter/document/statements issued by clients for a specific product, assuring that the product met their specifications and works correctly in its intended application;<br>(ii) detailed description of procedure of handling consumer complains<br>(iii) documentation demonstrating the quality certification, in accordance with the standard ISO 9001, or equivalent<br>(iv) documentation demonstrating the paper quality, in accordance with the standard EN ISO/IEC 17050-1:2004, which provides general criteria for suppliers' declaration of conformity with standards. |

|  |   |  |
|--|---|--|
| <b>Verification of the fitness for use: detailed list of options</b> | Several options for compliance should be listed, including having a service for handling complaints.  | <b>ACCEPTED:</b><br>See above  |
| <b>Fitness for use</b>   | Fitness for use is important. But the proposal will not add any value. It is likely that all printers have 1 (one) customer that is satisfied and will sign a declaration, hence this criterion is redundant. | <b>ACKNOWLEDGED</b><br>The EU Ecolabel should guarantee the good performance of the product. |

## Criterion 9: Information on the product

| Subject                                    | Comment   | JRC response        |
|--|---|---------------------|
| 'Please collect used paper for recycling'. | "This criterion is new. It was not included in the current version of the EU Ecolabel (for converted paper products). It is not possible for envelopes manufacturers to print neither the EU Ecolable symbol, not any further sentences on the final product as such. In fact, the EU Ecolabel symbol is generally NOT printed directly on the product (the envelope), but rather on the packaging/wrapping. It is not the producer of envelopes that decides what goes on the envelope or on the packaging/wrapping of envelopes, but the client. Request: introduce an exemption from this criterion for envelopes. | <b>ACKNOWLEDGED</b> |

## Criterion 10 — Information appearing on the EU Ecolabel

No additional comments were submitted