# EU Ecolabel criteria for ABSORBENT HYGIENE PRODUCTS
## 14 October 2021

### ETIQUETTE FOR WEB-PARTICIPANTS

- Please indicate “NAME OF YOUR ORGANIZATION + YOUR FULL NAME”
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# EU Ecolabel criteria for Absorbent Hygiene Products

## 1st Ad-hoc Working Group Meeting

Zahara Pérez Arribas
Malgorzata-Agata Kowalska
M. Natividad Pérez Camacho
Giorgia Faraca

*14th October 2021 (Webex)*

# Agenda

**Morning session: 08:45-13:00**

| | |
|---|---|
| Opening of virtual room and welcome of participants | 08:45 – 09:00 |
| Political objectives of the EU Ecolabel and process description | 09:00 – 09:10 |
| Revised scope and definitions<br>Background information, market analysis, LCA screening study | 09:10 – 10:00 |
| EU Ecolabel criteria for AHPs - Revision of criteria and discussion: Criterion 1: Product Description & Criterion 2: Fluff pulp | 10:00 – 11:15 |
| 15 min break | |
| EU Ecolabel criteria for AHPs - Revision of criteria and discussion: Criterion 3: Man-made cellulose fibres & Criterion 4: Cotton and other natural cellulosic seed fibres | 11:30 – 12:15 |
| EU Ecolabel criteria for AHPs - Revision of criteria and discussion: Criterion 5: Plastic materials and superabsorbent polymers | 12:15-13:00 |
| Lunch break | 13:00-14:00 |

# Agenda

**Afternoon session: 14:00-18:00**

| | |
|---|---|
| EU Ecolabel criteria for AHPs - Revision of criteria and discussion: Criterion 6: Excluded and restricted substances | 14:00 – 15:30 |
| 15 min break | |
| EU Ecolabel criteria for AHPs - Revision of criteria and discussion:<br>Criterion 7: Material efficiency in the manufacturing<br>Criterion 8: Packaging<br>Criterion 9: Guidance on the product disposal | 15:45 – 16:45 |
| EU Ecolabel criteria for AHPs - Revision of criteria and discussion:<br>Criterion 10: Fitness for use and quality of the product<br>Criterion 11: Social aspects<br>Criterion 12: Information appearing on the EU Ecolabel | 16:45 – 17:45 |
| Conclusion, next steps and closure of the workshop | 17:45 – 18:00 |

# JRC Mission

As the science and knowledge service of the European Commission our mission is to support EU policies with independent evidence throughout the whole policy cycle.

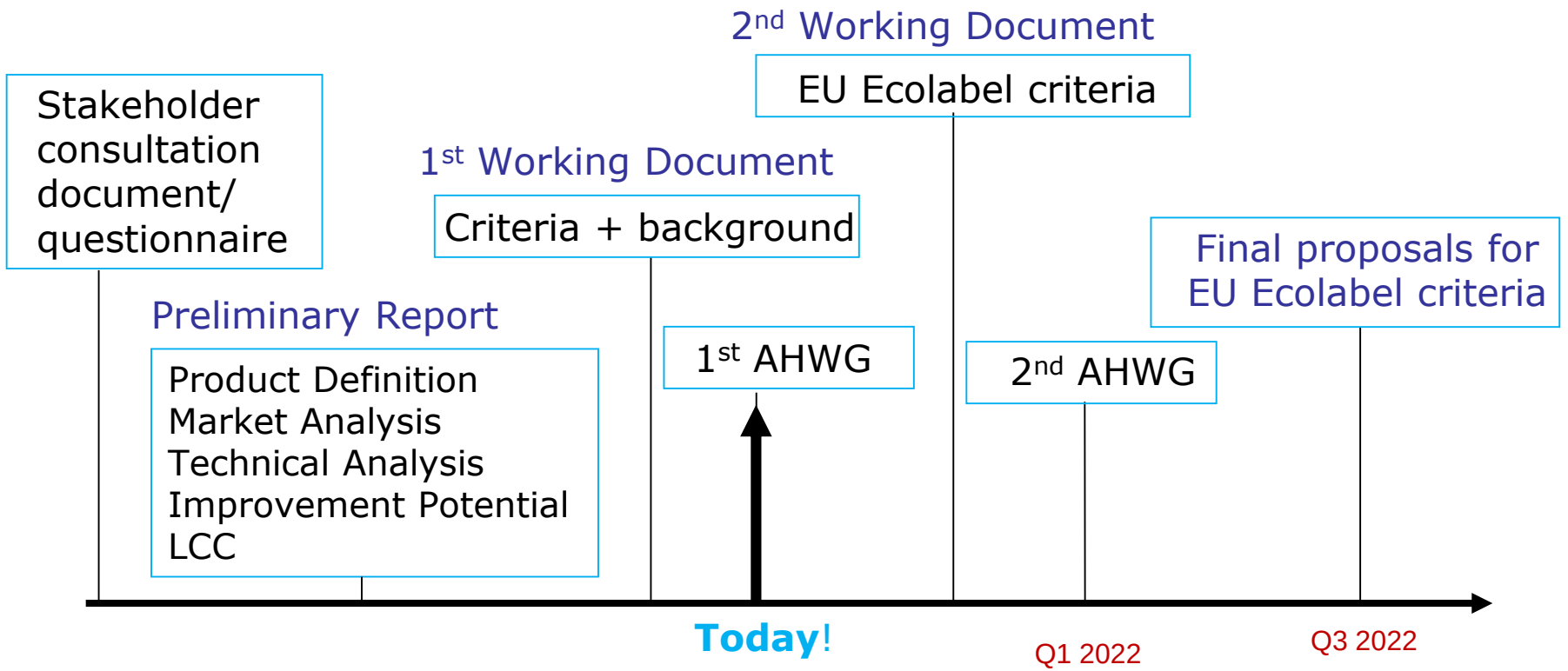
# **Political objectives & Process description**
## Activities in support of Product Policy

- JRC B5 Product Bureau supports the development and implementation of Sustainable Product Policies, among them the EU Ecolabel Regulation and the Green Public Procurement Communication.

- Analysis of product groups with focus on techno-economic and environmental aspects.

- Develop criteria and implementing measures until the stage of voting in committee

# Political objectives & Process description
## Criteria development process



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# Revised scope proposal
## Existing scope

| ***Existing product group name*** |
| --- |
| *Absorbent Hygiene products* |
| ***Existing product group scope and definition:*** |
| *1. The product group 'absorbent hygiene products' shall comprise **baby diapers, feminine care pads, tampons and nursing pads** (also known as breast pads), which are disposable and composed of a mix of natural fibres and polymers, with the fibre content lower than 90 % by weight (except for tampons).*<br>*2. The product group shall not include incontinence products and any other type of products falling under the scope of Council Directive 93/42/EEC (*).*<br>*(*) Council Directive 93/42/EEC of 14 June 1993 concerning medical devices* |

**General interest to expand the product scope**

# Revised scope proposal
## Product categorization

- The AHP group is heterogeneous and there is no standard classification

**PRODCOM** → 5 product categories under the category "Sanitary towels and tampons, napkins and napkin liners for babies and similar sanitary articles and articles of apparel and clothing accessories, of paper pulp, paper, cellulose wadding or webs of cellulose fibres".

**Euromonitor** → 6 relevant categories under the category “retail hygiene”.

**EDANA**→ 2 categories (diapers for baby and adult incontinence and absorbent feminine hygiene products.

# Revised scope proposal
## Reusable AHP




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| PROPOSED CATEGORIES for the purpose of this revision | | | |
|---|---|---|---|
| **Adult incontinence care products** | | Disposable (single-use) incontinence products | Products intended to be used by adults in order to keep body fluids when uncontrolled bladder or bowel movements and aimed to make their everyday lives easier. Although the most common products are pads and diapers, other products include disposable underwear and incontinence slips or tampons. |
| **Baby diapers or nappies** | | **Disposable (single-use) baby diapers or nappies** | Products to be used by babies to keep their body fluids and made of disposable materials as cellulose and polymers, thus being a single-use product. |
| | | Reusable baby diapers or nappies (cloth diapers) | Products to be used by babies to keep their body fluids and made of cloth and other fibres which can be washed for its use for a certain number of years. |
| **Feminine sanitary protection** | Sanitary Pads or Towels | **Disposable (single-use) sanitary pads or towels** | Products used by women when menstruating to absorb fluids from the body. Usually they are placed on the underwear, are made of cellulose and polymers and dispose after use. |
| | | Reusable sanitary pads or towels (cloth pads or towels) | Products used by women when menstruating to absorb fluids from the body. Usually they are placed on the underwear, are made of a variety of fibres and can be washed and reused. |
| | Panty Liners | **Disposable (single-use) panty liners** | Products used by women in a daily-basis to absorb fluids from the body. They are thinner than pads. Usually they are placed on the underwear, are made of cellulose and polymers and dispose after use. |
| | | Reusable panty liners (cloth panty liners) | Products used by women in a daily-basis to absorb fluids from the body. They are thinner than pads. Usually they are placed on the underwear, are made of variety of fibre and can be washed and reused. |
| | Tampons | **Disposable (single-use) tampons** | Products made of natural fibres as cotton which are placed inside the vagina to absorb menstrual fluids and blood. They have a bullet shape, can be used with or without applicator and are disposable. |
| | Menstrual Cups | Disposable (single-use) menstrual cups | Flexible cups or barriers worn inside the vagina during menstruation to collect menstrual fluid rather than absorbing it. They are usually made from different disposable polymers. |
| | | Reusable menstrual cups | Flexible cups or barriers worn inside the vagina during menstruation to collect menstrual fluid rather than absorbing it. They are usually made from different stable and reusable materials which allows them to be washed and reused for up to 10 years. |
| | Nursing Pads (breast pads) | **Disposable (single-use) nursing pads** | Pads used to absorb and keep fluids away from the skin when breastfeeding. Disposable nursing pads are usually made of cellulose materials. |
| | | Reusable nursing pads or breast pads (cloth nursing pads or breast pads) | Pads used to absorb and keep fluids away from the skin when breastfeeding. Reusable nursery pads can be made of several natural fibres. |

# **Revised scope proposal**
# Methodology for scope expansion

Selection of product categories to be included in the scope → different relevant aspects:

- Similarity of **material components**, compared to products included in the existing scope
- Inclusion in **other Ecolabels** and environmental schemes
- Stakeholder's **interest** in the inclusion of specific product
- **Market share** of the product
- **Environmental impacts**

# Revised scope proposal
## Methodology for scope expansion

| PRODUCT CATEGORY | Similarity with products currently in the scope | Inclusion in other ecolabels or environmental schemes | Interest of stakeholders | Global Market relevance 2019 | Market relevance 2019 (EU 28) | Environmental impacts | Potential for inclusion |
|---|---|---|---|---|---|---|---|
| Reusable baby diapers or nappies | | | | | | | Low |
| Reusable sanitary pads or towels | | | | | | | Low |
| Reusable panty liners | | | | | | | Low |
| Reusable Menstrual cups | | | | | 2 points | | Medium |
| Reusable nursing pads or breast pads | 0 points | 1 point | | | | | Low |

**Proposed to be included**

# Revised scope proposal
## Proposed scope

| ***First proposal of product group name*** |
| --- |
| *Absorbent hygiene products and menstrual cups* |
| ***First proposal of product group scope and definition:*** |
| *1. The product group 'absorbent hygiene products' shall comprise any sanitary article whose function is to absorb and retain human urine, faeces, sweat, menstrual fluid and milk - excluding textile products.*<br><br>*2. The product group 'menstrual cups' shall comprise reusable flexible cups or barriers worn inside the body to retain and collect menstrual fluid, and usually made of medical-grade silicone, rubber, latex, or elastomer.*<br><br>*3. The product groups 'absorbent hygiene products' and 'menstrual cups' shall not include ~~incontinence products and any other type of~~ products falling under the scope of ~~Council Directive 93/42/EEC amended by~~ Regulation (EU) 2017/745 on medical devices.* |

# Summary of Preliminary Report
## Market analysis

- Disposable AHP products extensively lead the market compared to their reusable alternatives.
- Of the 59 bn units of AHP sold, baby diapers represent 35%, followed by panty liners (30%), feminine care pads (25%) and tampons (10%).
- UK, France, Germany, Italy, and Spain are the “big five”
- Menstrual cups market data suggest a relevant growth in sales.
- The global feminine hygiene products market size is expected to rise, with a shift toward eco-friendly variants

# **Summary of Preliminary Report**
## Environmental analysis


**Life cycle assessment**

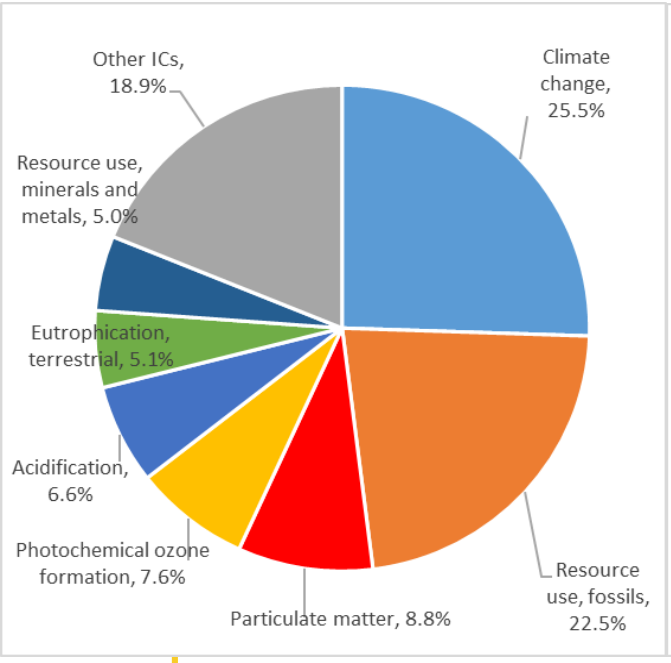
# LCA screening study

**One piece of an average product marketed in the European Union**

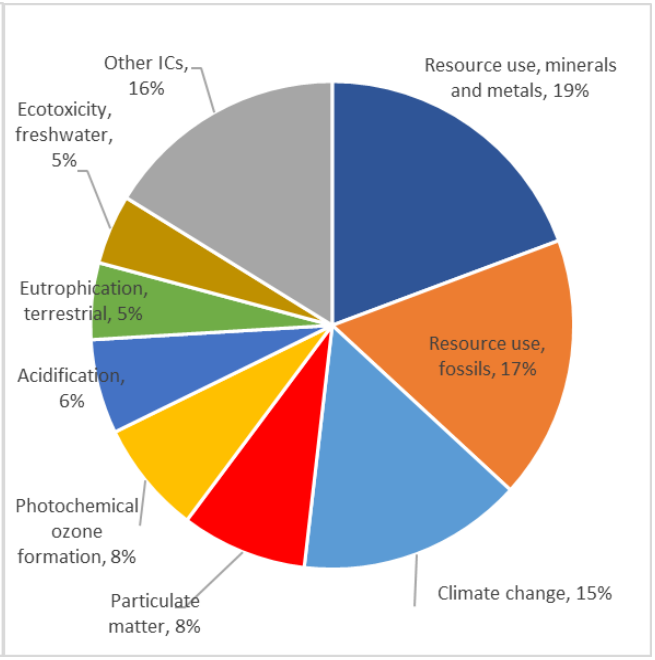
An average open baby diaper

An average sanitary towel

Open baby diaper




Sanitary towel




| ***Environmental hotspots*** | |
|---|---|
| ***Baby diapers*** | ***Sanitary towels*** |
| PP granulates | |
| Kraft pulp (cellulose) and polyester resin (proxy for adhesives) | |
| acrylic acid | viscose |
| acetic acid | PET |
| Electricity used for SAP | - |
| LDPE packaging | |

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| Current criteria | | Proposed changes to the revised criteria | |
|---|---|---|---|
| 1 | Product Description | Product Description | 1 |
| 2 | Fluff Pulp | Fluff Pulp | 2 |
| 2.3 | Optical brighteners and colouring agents | Moved to criterion 6.3 | 2.3 |
| 3 | Man-made cellulose fibres | Man-made cellulose fibres | 3 |
| 3.3 | Optical brighteners and colouring agents | Moved to criterion 6.3 | 3.3 |
| 4 | Cotton and other natural cellulosic seed fibres | Cotton and other natural cellulosic seed fibres | 4 |
| 4.3 | Optical brighteners and colouring agents | Moved to criterion 6.3 | 4.3 |
| 5 | Plastic materials and SAP | Production of polymers | 5 |
| 5.2 | Additives in plastic materials | Moved to criterion 6.3 | |
| 5.3 | SAP | Moved to criterion 6.3 | |
| 6 | Other materials and components | REMOVED (individual sub-criteria moved) | |
| 7 | Hazardous substances and mixtures | Excluded and restricted substances | 6 |
| 7.3 | | Specific restrictions - NEW | 6.3 |
| 8 | Material efficiency in the manufacturing | Material efficiency in the manufacturing | 7 |
| | | Packaging - NEW | 8 |
| 9 | Guidance on the product disposal | Guidance on the packaging and product disposal | 9 |
| 10 | Fitness for use and quality of the product | Fitness for use and quality of the product | 10 |
| 11 | Social aspects | Corporate Social Responsibility with regard to Labour Aspects | 11 |
| 12 | Information appearing on the EU Ecolabel | Information appearing on the EU Ecolabel | 12 |

# Summary of Preliminary Report

**Questions and comments?**

# Criterion 1 - Product Description

| Existing criterion 1: Product description |
| --- |
| A description of the product and packaging shall be provided (product name, classification, functionalities) together with information on all of the following characteristics:<br><br>— the total weight of the product and packaging,<br><br>— the components, materials and additives used in the product with their respective weights and, whenever applicable, their respective CAS numbers.<br><br>Information on the weight of the product shall be also displayed in the packaging<br><br>**Assessment and verification**: The applicant shall provide a sample of the product and a report including the technical description and the weight of the product and of each component, material and additive used. |

# Criterion 1 - Product Description

## Stakeholders feedback - online questionnaire (October 2020)

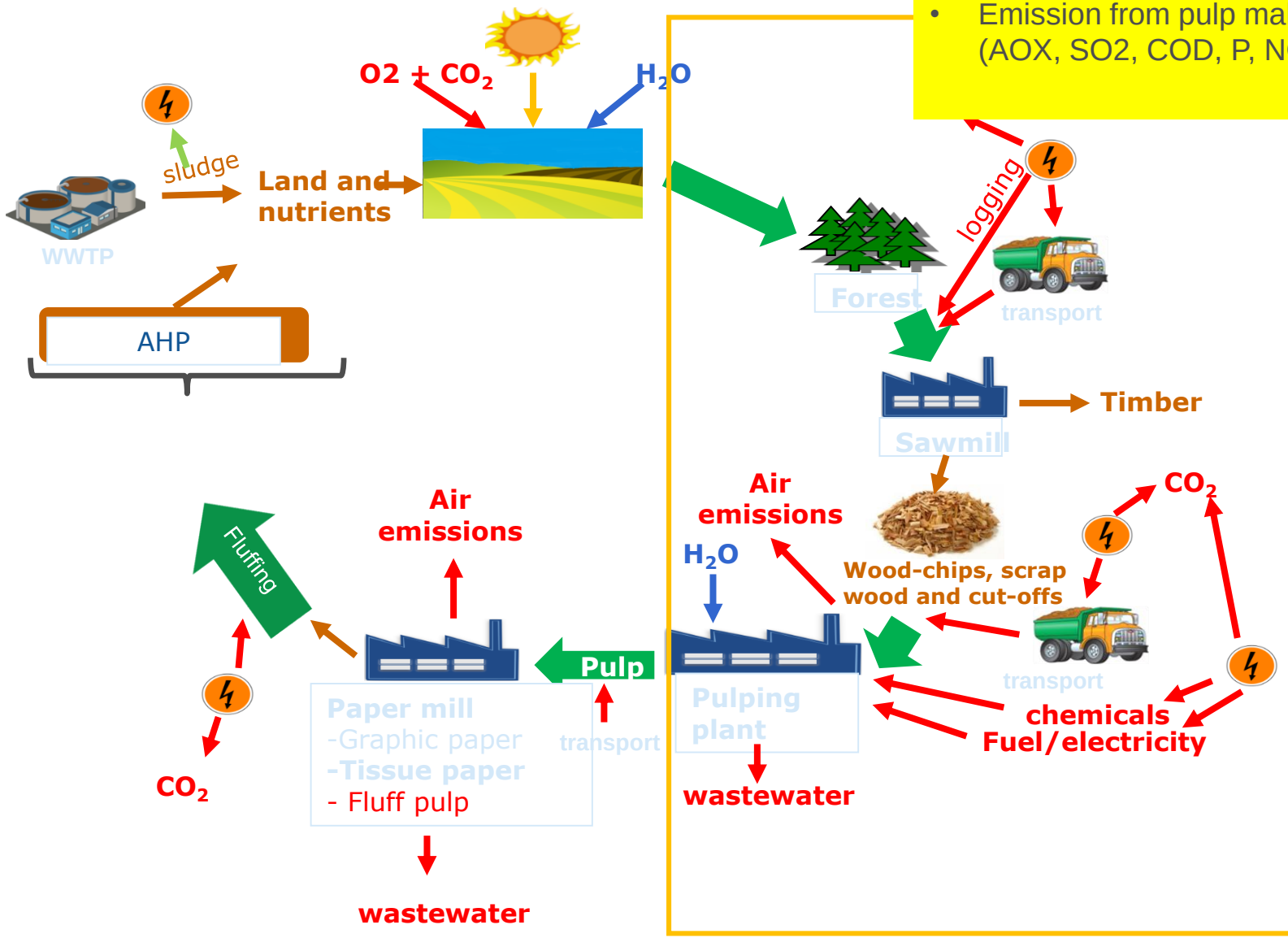
*Absorbent Hygiene product is made of many different materials, which represent a complex supply chain each,* ***this criterion should not be withdrawn;***

***Displaying information*** *about the product* ***weight*** *on the packaging was assumed as* ***irrelevant*** *and* ***burden*** *to change the packaging design****;***

| **Proposed criterion 1: Product description** |
| --- |
| A description of the product and packaging shall be provided ~~(product name, classification, functionalities)~~ together with information on all of the following characteristics:<br><br>— the total weight of the product and packaging,<br><br>— the components, materials and additives used in the product with their respective weights and, whenever applicable, their respective CAS numbers.<br><br>~~Information on the weight of the product shall be also displayed in the packaging~~<br><br>**Assessment and verification**: The applicant shall provide a technical description of the product that shall include information on the weight of the product and of each component, material and additive used in the final product. |

# Criterion 2 - Fluff Pulp

Hotspots
- Fibre sourcing
- CO2 emission
- Emission from pulp making process (AOX, SO2, COD, P, NOx)



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# Criterion 2 - Fluff Pulp
## 2.1 – Sourcing

| **Existing criterion 2.1: Sourcing** |
| --- |
| All pulp fibres shall be covered by valid chain of custody certificates issued by an independent third party certification scheme such as FSC, PEFC or equivalent. A minimum of 25 % pulp fibres shall be covered by valid Sustainable Forestry Management certificates issued by an independent third party certification scheme such as FSC, PEFC or equivalent. The remaining proportion of pulp fibres shall be covered by a verification system which ensures that it is legally sourced and meets any other requirement of the certification scheme with respect to uncertified material. The certification Bodies issuing forest and/or chain of custody certificates shall be accredited/recognised by that certification scheme.<br><br>***Assessment and verification**:*<br><br>*The applicant shall obtain from the pulp manufacturer(s) valid, independently certified chain of custody certificates demonstrating that wood fibres have been grown according to Sustainable Forestry Management principles and/or are from legal and controlled sources. FSC, PEFC or equivalent schemes shall be accepted as independent third party certification.* |

**ISSUE:**
Ambition level established by the horizontal EU Ecolabel criterion on SFM fibre sourcing (Commission Decision (EU) 2019/70)

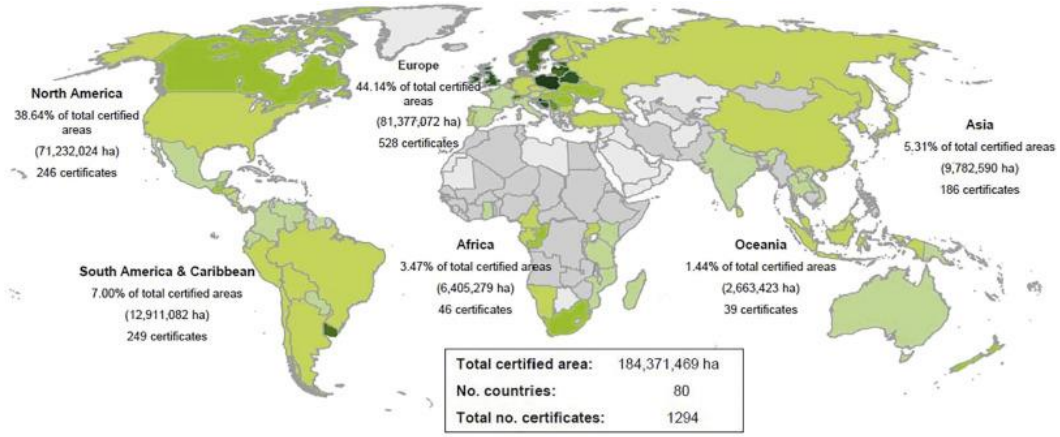
# Criterion 2 - Fluff Pulp
## 2.1 - Sourcing - Rationale

**Stakeholders feedback - online questionnaire (October 2020)**

*__46%__ of the respondents indicated the __need to change__ the criterion 2.1. - __To increase__ the ambition level for __the minimum SFM certified fibers__ content and __horizontally harmonise with__ EUEL GPTP*

# Criterion 2 - Fluff Pulp
## 2.1 – Sourcing - Rationale

| | FSC 100% | FSC Mix | FSC Recycled | PEFC certified | PEFC recycled |
|---|---|---|---|---|---|
| Sustainable virgin | 100% | 70-100% | 0% | 70-100% (with a maximum of 84.99% recycled material) | 70-100% |
| Post-consumer recycled | 0% | | 100% | | |
| Pre-consumer recycled | | | | | |
| Controlled | | 0-30% | 0% | 0-30% | 0-30% |

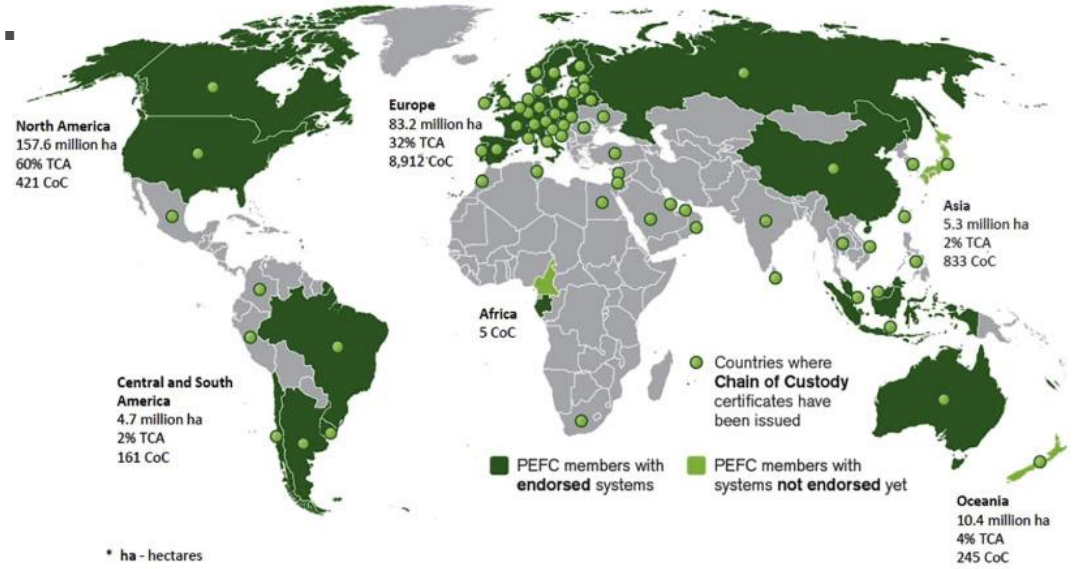



a) **FSC**

**Some stakeholders showed an interest, in shifting to a credit principle instead of a percentage system.**

**Percentage system –** a chain of custody system applied at the product group level which allows all outputs to be sold with a percentage claim that corresponds to the proportion of FSC and postconsumer input over a certain period in time.

**Transfer system** – a chain of custody system applied at the product group level which allows outputs to be sold with an FSC claim that is identical to the material category and, if applicable, the associated percentage claim or credit claim with the lowest FSC or postconsumer input per input volume. Does not allow mixing of material categories




b) **PEFC**



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# Criterion 2 - Fluff Pulp
## 2.1 - Sourcing - Rationale

Horizontal Criterion on fibre sourcing based on EU Ecolabel criteria for graphic paper, tissue paper and tissue products - Commission Decision (EU) 2019/70

- *the fibre raw material may consist of recycled fibres or virgin fibres.*
- *any virgin fibres must not originate from GMO species.*
- *all fibres shall be covered by valid chain of custody certificates issued by an independent third-party certification scheme (e.g. FSC, PEFC or equivalent), or be covered by delivery notes of paper for recycling in accordance with EN 643*
- *at least 70 % of the fibre material allocated to the product or production line shall originate from forests or areas managed according to sustainable forestry management principles that meet the requirements set out by the relevant independent chain of custody scheme and/or originate from recycled materials.*

**ISSUE:**
Use of RCF fibre in the AHPs

POSSIBLE?

Nordic Swan: Recycled material is allowed in additional components, e.g. in tape or release paper that shall be removed before use and in primary packaging.

# Criterion 2 - Fluff Pulp
## 2.1 – Sourcing

**FIRST PROPOSAL**

- *To harmonise with the horizontal criterion on sustainable fibre sourcing (as stated in Commission Decision (EU) 2019/70)?*

- *To refer to virgin fibre only?*

# Criterion 2 - Fluff Pulp
## 2.1 - Sourcing

| Question to stakeholders |
| --- |
| • Do you agree with the proposed ambition level for fluff pulp?<br>• Should the requirement on sustainable fibre sourcing be harmonised with other EU Ecolabel criteria for paper based products, e.g. EU Ecolabel for graphic paper, tissue paper, and tissue paper products?<br>• Could recycled fibre be used in a final product? If yes, for which components? If not, which are the reasons behind? |

# Criterion 2 - Fluff Pulp
## 2.2 – Bleaching

**Existing criterion 2.2: Bleaching**

The pulp used in the product shall not be bleached with the use of chlorine gas. The total amount of AOX emissions from pulp manufacturing shall not exceed 0,170 kg/ADT.

***Assessment and verification**: The applicant shall provide a declaration from the pulp manufacturer that chlorine gas was not used and a test report showing compliance with the AOX limit value. ISO 9562 or the equivalent EPA 1650C shall be accepted as test methods, accompanied by detailed calculations showing compliance with this requirement, together with related supporting documentation.*

*The supporting documentation shall include an indication of the measurement frequency. AOX shall only be measured in processes where chlorine compounds are used for the bleaching of the pulp.*

*Measurements shall be taken on unfiltered and unsettled samples either after treatment at the plant or after treatment by a public treatment plant.*

*The measurement period shall be 12 months of production. Measurements shall be taken on a monthly basis from representative composite samples (24 hours composite).*

*For a new or rebuilt plant or a change of process at the production plant, measurements shall be done on a weekly basis for a total of 8 consecutive weeks following steady running of the plant. The measurement shall be representative of the respective campaign.*

# Criterion 2 - Fluff Pulp
## 2.2 – Bleaching

**ISSUES:**

- *PCDDS/PCDFs in a final product (ANSES Report, 2018)*
- *Does the criterion refer to pulp mix or each individual pulp in the mix?*
- *Reference value*
- *Testing methods*
- *Should refer to ECF process*

**Stakeholders feedback - online questionnaire (October 2020)**

*32% of respondents indicated the need to revise the limit for AOX emissions pulp manufacturing*

# Criterion 2 - Fluff Pulp
## 2.2 – Bleaching

***ANSES study*** *(ANSES, 2018) analysis of 23 single-use baby diapers*

- *DL-PCBs were detected in all the diapers at concentrations ranging from 16.98 to 1404.98 ng/kg of diaper,*
- *Dioxins were quantified in 17 of the 19 analysed samples,*
- *Furans were quantified in 14 of the 19 analysed samples.*

Conclusions: Presence of polyhalogenated organic compounds seems to be due to contamination of the raw materials or manufacturing processes (bleaching stage)

Follow up: France submission of a restriction proposal to ECHA on substances found in nappies on the 9th of October 2020

UNCERTAINTES OF THE ANSESS STUDY:

- Unknown origin of materials (fluff pulp outsourcing),
- No information about the technical parameters used during pulp bleaching process
- It is not possible to correlated presence of PCDDs/PCCFs with the level of AOX emission during the pulp bleaching

**BEST PRACTICE APPROACH**

# 2.2 – Bleaching

- AOX should need to be measured in processes where chlorine compounds are used at bleaching stage;
- The yearly average, specific AOX emissions of bleached kraft pulp mills at the point of discharge, i.e. after waste water treatment vary between undetectable and 0.3 kg AOX/ADt of bleached pulp.
- AOX emission depends on the kappa number achieved before pulp bleaching (correlation between wood type, AOX emission and COD emission).
- The conventional fluff pulp is mainly derived from bleached long fibre softwood kraft pulp
- Other schemes:

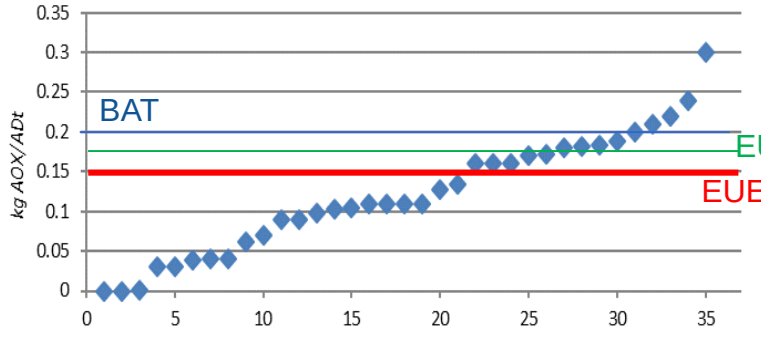
  Nordic Swan: 0,15 kg/Adt per pulp mixture and emissions of AOX from the individual pulp must be ≤0.17kg/tonne.

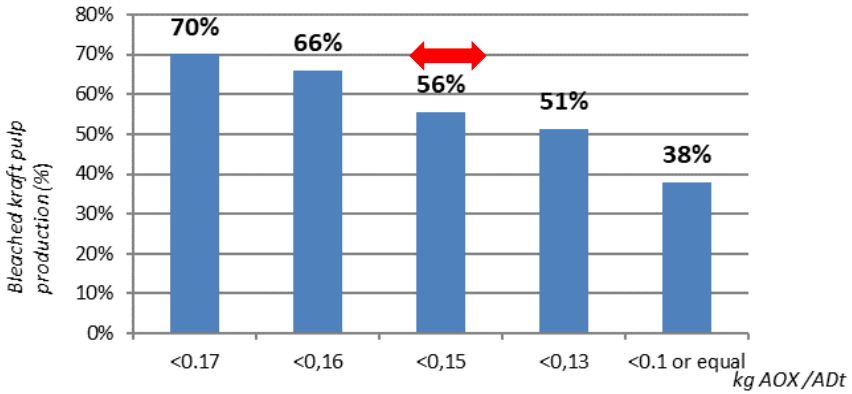
  Blue Angel: 0,12 kg/Adt (annual average)

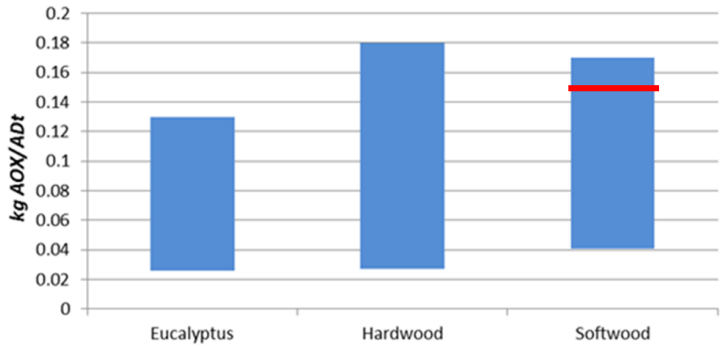
  EUEL GPTP: 0,17 kg/ADT each input pulp

**Proposed EUEL- AHP: 0.15 kg ADt for each individual pulp in a mix**

PROPOSAL




*Source: Shur et al., 2015 (BREF)*

# 2.2 – Bleaching

**Proposed criterion 2.2: Bleaching**

**Wording harmonized with EUEL GPTP**

This criterion refers to elemental chlorine free (ECF) pulp.

The pulp used in the product shall not be bleached with the use of elemental chlorine ($Cl_2$) gas.

The ~~total amount~~ ~~annual average of~~ AOX emissions from the production of each pulp each used in EU Ecolabel absorbent hygienic product shall not exceed ~~0,170~~ 0,140 kg/ADt.

***Assessment and verification**: The applicant shall provide a declaration from the pulp manufacturer that elemental chlorine ($Cl_2$) gas was not used. The declaration shall be supported by a test report using ISO 9562 test methods. Equivalent methods may be accepted as test methods, accompanied by detailed calculations showing compliance with this requirement, together with related supporting documentation.*

*The applicant shall provide a declaration of compliance with this criterion, supported by a list of the different ECF pulps used in the pulp mix, their respective weightings and their individual amount of AOX emissions, expressed as kg AOX/ADt pulp.*

*The supporting documentation shall include an indication of the measurement frequency. AOX shall only be measured in processes where chlorine compounds are used for bleaching the pulp. AOX does not need to be measured in the effluent from non-integrated paper production or in the effluents from pulp production without bleaching or where bleaching is performed with chlorine-free substances.*

*Measurements of AOX emissions to water shall be taken on unfiltered and unsettled samples at the effluent discharge point of the mills' wastewater treatment plant. In cases where mill effluent is sent to a municipal or other third-party wastewater treatment plant, unfiltered and unsettled samples from the mill effluent sewer discharge point shall be analysed and the results multiplied by a standard removal efficiency factor for the municipal or third-party wastewater treatment plant. The removal efficiency factor shall be based on information provided by the operator of the municipal or other third-party wastewater treatment plant.*

*Information on the emissions shall be expressed as the annual average from measurements taken at least once every 2 months. In case of a new or rebuilt production plant, measurements shall be based on at least 45 subsequent days of stable running of the plant. They shall be representative of the respective campaign.*

*In case the applicant does not use any ECF pulp, a corresponding declaration to the Competent Body is sufficient.*

# Criterion 2 - Fluff Pulp
## 2.2 – Bleaching

| Question to stakeholders |
| --- |
| Do stakeholders agree to increase an ambition level by lowering the reference value to 0.15 kg AOX/ADt for each pulp in a pulp mix? |

# Criterion 2 - Fluff Pulp
## 2.2 – Optical brighteners and colouring agents

| **Existing criterion 2.3: Optical brighteners and colouring agents** |
| --- |
| Optical brighteners and colouring agents, including fluorescent whitening agents, shall not be intentionally added to the pulp.<br><br>**Assessment and verification**: The applicant shall provide a declaration from the supplier that the requirements have been fulfilled. |
| ~~**Existing criterion 2.3: Optical brighteners and colouring agents**~~ [This criterion has been moved to Criterion 6.3(d)] |

# 2.4 – Emission of COD and P to water and S compounds and NOx to air from production

The emissions to air and water from the pulp production shall be expressed in terms of points (PCOD, PP, PS, PNOx). Points are calculated by dividing actual emission by the reference values reported in Table 1.

— None of the individual points PCOD, PP, PS, PNOx, shall exceed 1,5.

— The total number of points (Ptotal = PCOD + PP + PS + PNOx) shall not exceed 4,0.

For each pulp 'i' sourced, the related measured emissions (expressed in kg/air dried tonne — ADT) shall be weighted according to the proportion of pulp sourced (pulp 'i' with respect to air dried tonne of pulp) and summed together. The reference values for each pulp type used and for the paper production are given in the Table 1. Finally, the total emissions shall be divided by the total reference value as shown in the following formula for COD:

$$PCOD = \frac{COD_{total}}{COD_{ref,\,total}} = \frac{\sum_{i=1}^{n} pulp_i \times COD_{pulp,\,i}}{\sum_{i=1}^{n} pulp_i \times COD_{ref,\,pulp,\,i}}$$

| | Reference values (kg/ADT) | | | |
|---|---|---|---|---|
| | $COD_{ref}$ | $P_{ref}$ | $S_{ref}$ | $NOx_{ref}$ |
| Bleached chemical pulp (others than sulphite) | 18,0 | 0,045(*) | 0,6 | 1,6 |
| Bleached chemical pulp (sulphite) | 25,0 | 0,045 | 0,6 | 1,6 |
| CTMP | 15,0 | 0,01 | 0,2 | 0,3 |

(*) Net emissions of P are considered in the calculation. The P naturally contained in wood raw materials and in water can be subtracted from the total emissions of P. Reductions up to 0,010 kg/ADT shall be accepted

ISSUES:

Based on previous EUEL criteria for graphic paper (not in force)

UPDATE: EU Ecolabel criteria for graphic paper, tissue paper and tissue paper products

European Commission

# 2.4 – Emission of COD and P to water and S compounds and NOx to air from production

## Stakeholders feedback - online questionnaire (October 2020)

- ***36%** of respondents did **not express any opinion** in respect to the possible revision of sub-criterion 2.4,*
- ***29%** considered the criterion as **vali,** and*
- ***28%** indicated **the need to revise** the sub-criterion. The stakeholder comments focused on **the need to adjust** the limits, preferably harmonising the emission limit with the requirements set in the EU Ecolabel for tissue paper products according to **Annex II to Commission Decision (EU) 2019/70**.*

# 2.4 – Emission of COD and P to water and S compounds and NOx to air from production

| | Current EU Ecolabel criteria for AHP | Nordic Swan Basic Module (Version 2.2) | Blue Angel DE-UZ 208 | EU Ecolabel criteria for graphic paper, tissue paper and tissue products **PROPOSAL** |
|---|---|---|---|---|
| individual points PCOD, PP, PS, PNOx | 1.5 | 1.5 | 1.5 | 1.3 |
| total number of points (Ptotal = PCOD + PS + PNOx + PP) | 4 | 4 | 5 | 4 |
| Bleached chemical pulp (others than sulphite) | | | | |
| CODref (kg/ADT) | 18 | 18 | 18 | 16 |
| Pref (kg/ADT) | 0.045 | 0.03 | 0.03 | 0.025 (0.09[1]) |
| Sref (kg/ADT) | 0.6 | 0.6 | 0.6 | 0.35 |
| NOxref (kg/ADT) | 1.6 | 1.5 | 1.5 | 1.6 |
| Bleached chemical pulp (sulphite) | | | | |
| CODref (kg/ADT) | 25 | 25 | 18 | 24 |
| Pref (kg/ADT) | 0.045 | 0.03 | 0.03 | 0.04 |
| Sref (kg/ADT) | 0.6 | 0.6 | 0.6 | 0.75 |
| NOxref (kg/ADT) | 1.6 | 1.5 | 1.5 | 1.6 |
| CTMP | | | | |
| CODref (kg/ADT) | 15 | 15 | 18 | 16 |
| Pref (kg/ADT) | 0.01 | 0.01 | 0.03 | 0.008 |
| Sref (kg/ADT) | 0.2 | 0.2 | 0.6 | 0.2 |
| NOxref (kg/ADT) | 0.3 | 0.25 | 1.5 | 0.25 (0.7[2]) |

# Criterion 2.4 – Proposal

**To harmonise with EUEL -GPTP**

The emissions to air and water from the pulp production shall be expressed in terms of points (PCOD, PP, PS, PNOx). Points are calculated by dividing actual emission by the reference values reported in Table 1.

— None of the individual points PCOD, PP, PS, PNOx, shall exceed 1,3.

— The total number of points (Ptotal = PCOD + PP + PS + PNOx) shall not exceed 4,0.

| | Reference values (kg/ADT) | | | |
|---|---|---|---|---|
| | $COD_{ref}$ | $P_{ref}$ | $S_{ref}$ | $NOx_{ref}$ |
| Bleached chemical pulp (others than sulphite) | ~~18,0~~ 16,0 | ~~0,045~~ 0,025(1)<br>0,09 (2) | ~~0,6~~ 0,35 | 1,6 |
| Bleached chemical pulp (sulphite) | ~~25,0~~ 24,0 | 0,045 | ~~0,6~~ 0,75 | 1,6 |
| CTMP | ~~15,0~~ 16,0 | ~~0,01~~ 0,008 | 0,2 | 0,3 |

(1) Net emissions of P are considered in the calculation. The P naturally contained in wood raw materials and in water can be subtracted from the total emissions of P. Reductions up to 0,010 kg/ADT shall be accepted

(2) The higher value refers to mills using eucalyptus from regions with higher levels of phosphorous (e.g. Iberian eucalyptus).

**Assessment and verification:**

COD: ISO 15705 or ISO 6060; Rapid tests (TOC)

NOx: EN 14792 or ISO 11564;

S(sulphur oxides): EN 14791 or EPA no 8; S(reduced sulphur): EPA no 15A,16A or 16B; S content in oil: ISO 8754; S content in coal: ISO 19579; S content in biomass: EN 15289;

Total P: EN ISO 6878.

# 2.4 – Emission of COD and P to water and S compounds and NOx to air from production

| Question to stakeholders |
| --- |
| How can the reference values established by EU ecolabel criteria for graphic paper, tissue paper, and tissue paper products be adapted to the fluff pulp market situation? |

# 2.5 – Emissions of CO2 from production

## Criterion address fluff pulp manufacturing

CO2 emissions from non-renewable energy sources shall not exceed 450 kg per tonne of pulp produced, including emissions from the production of electricity (whether on-site or off-site). Reference emission values according to Table shall be used in the calculation of CO2 emission from fuels.

| Fuel | CO2 fossil emissions | Unit |
|---|---|---|
| Coal | 95 | g CO2 fossil/MJ |
| Crude oil | 73 | g CO2 fossil/MJ |
| Fuel oil 1 | 74 | g CO2 fossil/MJ |
| Fuel oil 2-5 | 77 | g CO2 fossil/MJ |
| LPG | 69 | g CO2 fossil/MJ |
| Natural Gas | 56 | g CO2 fossil/MJ |
| Grid Electricity | 400 | g CO2 fossil/kWh |

All sources of non-renewable fuels during the production of pulp, including the emissions from the production of electricity (whether on-site or off- site).

The amount of energy from renewable sources purchased and used for the production processes will not be considered in the calculation of the CO2 emissions:

**No changes** in the criteria text are proposed **at this point** as further information should be gathered on reference values for $CO_2$ emissions from different energy sources.

# 2.5 – Emissions of CO2 from production

## Stakeholders feedback - online questionnaire (October 2020)

*46% did not express any opinion*

*29% confirmed adequateness of the currently valid requirement.*

*21% of respondents indicated the need to revise the sub-criterion..*

- *Nordic Swan: For production of pulp/fluff/ and pulp for air-laid, the limit value foremissions of CO2 is 450 kg CO2/ADT. For mechanical fluff pulp (CTMP) the limit value for emissions of CO2 is 900 kg CO2/ADT. Nordic Ecolabelling uses a factor of 385 g CO2/kWh.*

**It is proposed** to largely harmonise the assessment and verification with criterion 1(c) of Annex II of the Commission Decision (EU) 2019/70

- For each pulp used, the pulp manufacturer shall provide the applicant with a single CO2 emission value in kg CO2/ADt.
- Should CO2 emission address pulp manufacturing process not only pulp fluffing process?
- Emission factors for fuels shall be used in accordance with Annex VI of Regulation (EU) No 601/2012. For grid electricity, an emission calculation factor of 376 (kg CO2/MWh) shall be used in accordance with the Commission Delegated Regulation (EU) 2019/331.

# 2.5 – Emissions of CO2 from production

| Question to stakeholders |
| --- |
| • Should the amount of CO2 emissions from non-renewable energy sources per tonne of pulp produced be updated?<br>• Should a categorization of the different pulps used be established and set up appropriate criteria for each?<br>• We would like to call for stakeholders to provide input on the reference values for CO2 emissions from different energy sources presented in Table 2. |

# Criteria 1 & 2

**Questions and comments?**

# Criterion 2

| 2.1 Sourcing |
| --- |
| Do you agree with the proposed ambition level for fluff pulp?<br>Should the requirement on sustainable fibre sourcing be harmonised with other EU Ecolabel criteria for paper based products, e.g. EU Ecolabel for graphic paper, tissue paper, and tissue paper products?<br>Could recycled fibre be used in a final product? If yes, for which components? If not, which are the reasons behind? |
| **2.2 Bleaching** |
| Do stakeholders agree to increase an ambition level by lowering the reference value to 0.15 kg AOX/ADt for each pulp in a pulp mix? |
| **2.4 Emissions of COD and P to water and S compounds and NOx to air from production** |
| How can the reference values established by EU ecolabel criteria for graphic paper, tissue paper, and tissue paper products be adapted to the fluff pulp market situation? |
| **2.5 Emissions of COD from production** |
| Should the amount of CO2 emissions from non-renewable energy sources per tonne of pulp produced be updated?<br>Should a categorization of the different pulps used be established and set up appropriate criteria for each?<br>We would like to call for stakeholders to provide input on the reference values for CO2 emissions from different energy sources. |

**Coffee break: 15 minutes**

# Criterion 3 - Man-made cellulose fibres

| ***Existing criterion 3.1 – Sourcing*** |
| --- |
| (a) All pulp fibres shall be covered by valid chain of custody certificates issued by an independent third party certification scheme such as FSC, PEFC or equivalent.<br>A minimum of 25 % pulp fibres shall be covered by valid Sustainable Forestry Management certificates issued by an independent third party certification scheme such as FSC, PEFC or equivalent.<br>The remaining proportion of pulp fibres shall be covered by a verification system which ensures that it is legally sourced and meets any other requirement of the certification scheme with respect to uncertified material.<br>The certification Bodies issuing forest and/or chain of custody certificates shall be accredited/recognised by that certification scheme.<br>(b) Dissolving pulp produced from cotton linters shall meet the criterion 4.1 for cotton (sourcing and traceability).<br>***Assessment and verification****:*<br>*The applicant shall provide detailed calculations showing compliance with this requirement, together with related supporting documentation.*<br>*(a) The applicant shall obtain from the pulp manufacturer(s) valid, independently certified chain of custody certificates demonstrating that wood fibres have been grown according to Sustainable Forestry Management principles and/or are from legal and controlled sources. FSC, PEFC or equivalent schemes shall be accepted as independent third party certification.*<br>*(b) The application shall provide evidence of compliance according to criterion 4.1 for cotton (sourcing and traceability).* |

# Criterion 3 - Man-made cellulose fibres
## 3.1 - Sourcing

### Stakeholders feedback - online questionnaire (October 2020)

47% of the respondents indicated the need for revision:

- Increment in the ambition level for the minimum SFM certified fibers.
- No reference to compliance method from criterion 4.1 → use of verification-invoice.

**ISSUES**

- Level of ambition similar to graphic paper, tissue paper and tissue paper products?
- Recycled fibres?

# Criterion 3 - Man-made cellulose fibres

***First proposal of criterion 2.1 – Sourcing of man-made cellulose fibres***

(a) All pulp fibres shall be covered by valid chain of custody certificates issued by an independent third party certification scheme such as FSC, PEFC or equivalent.
A minimum of **70 %** pulp fibres shall be covered by valid Sustainable Forestry Management certificates issued by an independent third party certification scheme such as FSC, PEFC or equivalent.
The remaining proportion of pulp fibres shall be covered by a verification system which ensures that it is legally sourced and meets any other requirement of the certification scheme with respect to uncertified material.
The certification Bodies issuing forest and/or chain of custody certificates shall be accredited/recognised by that certification scheme.
(b) Dissolving pulp produced from cotton linters shall meet the criterion 4.1 for cotton (sourcing and traceability).

***Assessment and verification***:
*The applicant shall provide detailed calculations showing compliance with this requirement, together with related supporting documentation.*
*(a) The applicant shall obtain from the pulp manufacturer(s) valid, independently certified chain of custody certificates demonstrating that wood fibres have been grown according to Sustainable Forestry Management principles and/or are from legal and controlled sources. FSC, PEFC or equivalent schemes shall be accepted as independent third party certification.*
*(b) Invoices shall be provided which document that 70% of certified fibres have been allocated to the material they supply to the Absorbent Hygiene Product producer.*

# Criterion 3 - Man-made cellulose fibres
## 3.1 - Sourcing of man-made cellulose fibres

| Question to stakeholders |
| --- |
| • Should the requirement on sustainable fibre sourcing be harmonised with other EU Ecolabel criteria for paper based products, e.g. EU Ecolabel for graphic paper, tissue paper, and tissue paper products?<br><br>• Could recycled fibre be used in a final product? If yes, for which components? If not, which are the reasons behind? |

# Criterion 3 - Man-made cellulose fibres
## 3.2 – Bleaching

| ***Existing criterion 3.2 - Bleaching*** |
| --- |
| The pulp used to manufacture fibres shall not be bleached with the use of chlorine gas. The resulting total amount of adsorbable organically bound halogens (AOX) and organically bound chlorine (OCl) shall not exceed either of the following:<br>— 0,170 kg/ADT, if measured in the wastewater from pulp manufacturing (AOX), or<br>— 150 ppm, if measured in the finished fibres (OCl).<br><br>***Assessment and verification***:<br>*The applicant shall provide a declaration from the pulp supplier that chlorine gas is not used and a test report showing compliance with either the AOX or the OCl requirement, using the appropriate test method:*<br>— *ISO 9562 or the equivalent EPA 1650C for AOX,*<br>— *ISO 11480 for OCl.*<br>*Frequency of measurement for AOX shall be set in accordance with the criterion 2.2 for fluff pulp.* |

# Criterion 3 - Man-made cellulose fibres
## 3.2 – Bleaching

### Stakeholders feedback - online questionnaire (October 2020)

21% of the respondents indicated the need for revision. Highlighted the alignment with sub-criterion 2.2.

### Proposed changes

- Harmonisation with the Nordic Swan: it is proposed to make compulsory both requirements of criterion 3.2, i.e. to comply with the AOX emission limit in the wastewater and with the concentration (ppm) of OCl in the finished fibres.
- It is proposed to tighten the **AOX limit to 0,150 kg/ADT**.

# Criterion 3 - Man-made cellulose fibres
## 3.2 – Bleaching of man-made cellulose fibres

| ***First proposal criterion 3.2 – Bleaching of man-made cellulose fibres*** |
|---|
| The pulp used to manufacture man-made cellulose fibres shall not be bleached with the use of elemental chlorine ($Cl_2$) gas. The resulting total amount of adsorbable organically bound halogens (AOX) and organically bound chlorine (OCl) shall not exceed both of the following:<br>— ~~0,170~~ **0,150** kg/ADT, when measured in the wastewater from pulp manufacturing (AOX), ~~or~~<br>and<br>— 150 ppm, when measured in the finished fibres (OCl).<br><br>***Assessment and verification****:*<br>*The applicant shall provide a declaration from the pulp supplier that chlorine gas is not used and a test report showing compliance with either the AOX or the OCl requirement, using the appropriate test method:*<br>*— ISO 9562 or the equivalent EPA 1650C for AOX,*<br>*— ISO 11480 for OCl.*<br>*Frequency of measurement for AOX shall be set in accordance with the criterion 2.2 for fluff pulp.* |

# Criterion 3 - Man-made cellulose fibres
## 3.2 – Bleaching of man-made cellulose fibres

| Question to stakeholders |
| --- |
| Do stakeholders agree to increase an ambition level by lowering the reference value to 0.15 kg AOX/ADt? |

**Criterion 3 - Man-made cellulose fibres**
3.3 – Optical brighteners and colouring agents **MOVED**

# Criterion 3 - Man-made cellulose fibres

## *Existing criterion 3.4 – Production of fibres*

(a) More than 50 % of pulp used to manufacture fibres shall be obtained from dissolving pulp mills that recover value from their spent process liquor either by:

— generating on-site electricity and steam, or

— manufacturing chemical co-products.

(b) The following limit values for the emission of sulphur compounds to air shall be respected in the viscose and in the modal fibres production process:

***Table 3*** *- Viscose and modal fibres sulphur emission values*

| Fibre type | Sulphur emissions to air — Limit value (g/kg) |
|---|---|
| Staple fibre | 30 |
| Filament fibre | |
| — Batch washing | 40 |
| — Integrated washing | 170 |

***Assessment and verification****:*

*(a) The applicant shall make the fibres manufacturers to provide a list of pulp suppliers used to produce the fibres and the proportion they supply. Supporting documentation and evidence shall be provided that the required proportion of suppliers has the appropriate energy generating equipment or co-product recovery and manufacturing systems installed at related production sites.*

*(b) The applicant shall provide detailed documentation and test reports showing compliance with this criterion, together with a declaration of compliance.*

# Criterion 3 - Man-made cellulose fibres
## 3.4 – Production of fibres

### Stakeholders feedback - online questionnaire (October 2020)

Only 15% of the respondents indicated the need for revision:

- Stakeholders requested harmonisation with the Nordic Swan
- Set a requirement for carbon disulphide emission

| Fibre type | Sulphur emissions to air — Limit value (g/kg) |
|---|---|
| Staple fibre | ~~30~~ **20** |
| Filament fibre | |
| — Batch washing | 40 |
| — Integrated washing | 170 |

### Proposed changes

- Sulfur emissions of staple fibres: market situation vs Nordic Swan It is proposed to tighten the **limit on sulphur emissions to air of 20 g/kg for staple fibres**.
- Inclusion of COD and Zn emission requirements to better address impacts of the production of these fibres?

# Criterion 3 - Man-made cellulose fibres
## 3.4 – Production of man-made cellulose fibres

| Questions to stakeholders |
| --- |
| Should COD and Zinc emission requirements for man-made cellulose fibres be included?<br><br>Should measurement frequency or test method be defined for sulphur emissions?<br><br>Should the specific requirement for carbon disulphide emission into air be added to this criterion? |

# Criterion 4 - Cotton and other natural cellulosic seed fibres

***Existing criterion 4.1 – Sourcing and traceability***

(a) Cotton shall be grown according to the requirements laid down in Council Regulation (EC) No 834/2007 (1), the US National Organic Programme (NOP) or equivalent legal obligations set by trade partners of the Union. The organic cotton content may include organically grown cotton and transitional organic cotton.

(b) Cotton grown according to criterion 4.1(a) and used to manufacture absorbent hygiene product shall be traceable from the point of verification of the production standard.

***Assessment and verification:***

*(a) Organic cotton content shall be certified by an independent control Body to have been produced in conformity with the production and inspection requirements laid down in Regulation (EC) No 834/2007, the US National Organic Programme (NOP) or those set by other trade partners. Verification shall be provided on an annual basis for each country of origin.*

*(b) The applicant shall demonstrate compliance with the cotton content requirement for the annual volume of cotton purchased to manufacture the final product(s) and according to each product line on an annualised basis: Transaction records or invoices shall be provided that document the quantity of cotton purchased on an annual basis from farmers or producer groups, and the total weight of certified bales.*

# 4.1 – Sourcing and traceability

## Stakeholders feedback - online questionnaire (October 2020)

35% respondents expressed the need for revision:

- Strength requirements of the removal cords in tampons may counteract with the criterion requirements.
- Open cotton certification to sustainability aspects other than organic

## Proposed changes

- To **exempt the tampon string** from complying with this criterion (<3% w/w product).

Tampon strings are exempted from complying with this requirement.

- **Better Cotton Initiative** (BCI) was proposed as an alternative scheme (adopted by Textiles). However, JRC (Dodd et al., 2013) reported schemes as BCI were not mature enough.

# **Criterion 4 - Cotton and other natural cellulosic seed fibres** 4.1 – Sourcing and traceability

| **Questions to stakeholders** |
| --- |
| Should BCI cotton certification be accepted as a proof of compliance?<br><br>Which are the certification schemes are relevant to be evaluated? |

# Criterion 4 - Cotton and other natural cellulosic seed fibres

| ***Existing criterion 4.2 – Bleaching*** |
| --- |
| Cotton shall not be bleached with the use of chlorine gas.<br><br>***Assessment and verification****:*<br>*The applicant shall provide a declaration from the supplier that chlorine gas is not used.* |

# **Criterion 4 - Cotton and other natural cellulosic seed fibres** 4.2 – Bleaching

## **Stakeholders feedback - online questionnaire (October 2020)**

Only **14% respondents** expressed the need for revision:

- **Consistency** with the AOX limit in criterion **2.2**.
- Possibility of adding a requirement on **sulphide and TCF** bleaching process.

**No changes are proposed** at this stage of the revision process.

# Criterion 4 - Cotton and other natural cellulosic seed fibres 4.2 – Bleaching

| Questions to stakeholders |
| --- |
| Should TCF be the only bleaching process allowed for cotton fibres?<br><br>Should a description of the bleaching process (if applicable) be provided by the applicant? |

**Criterion 4 - Cotton and other natural cellulosic seed fibres**
4.3 – Optical brighteners and colouring agents **MOVED**

# Criteria 3 & 4

**Questions and comments?**

# Criteria 3 & 4

| |
|---|
| **3.1 Sourcing of man-made cellulose fibres** |
| Should the requirement on sustainable fibre sourcing be harmonised with other EU Ecolabel criteria for paper based products, e.g. EU Ecolabel for graphic paper, tissue paper, and tissue paper products?<br>Could recycled fibre be used in a final product? If yes, for which components? If not, which are the reasons behind? |
| **3.2 Bleaching of man-made cellulose fibres** |
| Do stakeholders agree to increase an ambition level by lowering the reference value to 0.15 kg AOX/ADt? |
| **3.3 Production of man-made cellulose fibres** |
| Should COD and Zinc emission requirements for man-made cellulose fibres be included?<br>Should measurement frequency or test method be defined for sulphur emissions?<br>Should the specific requirement for carbon disulphide emission into air be added to this criterion? |
| **4.1 Sourcing and traceability of cotton and other natural cellulosic seed fibres** |
| Should BCI cotton certification be accepted as a proof of compliance?<br>Which are the certification schemes are relevant to be evaluated? |
| **4.2 Bleaching of cotton and other natural cellulosic seed fibres** |
| Should TCF be the only bleaching process allowed for cotton fibres?<br>Should a description of the bleaching process (if applicable) be provided by the applicant? |

# Criterion 5 - Plastic materials and superabsorbent polymers

| **Existing criterion 5.1– Production of synthetic polymers and plastic materials** |
| --- |
| All plants producing synthetic polymers and plastic materials used in the product shall have implemented systems for:<br>— water-saving (e.g. monitoring of water flow in a facility and circulating the water in closed systems),<br>— integrated waste management plan to optimise prevention, reuse, recycling, recovery and final disposal of waste (e.g. separation of different waste fractions),<br>— optimisation of energy efficiency and energy management (e.g. reuse of the steam generated during the manufacture of SAPs).<br>***Assessment and verification**:*<br>*The applicant shall provide a declaration of compliance with the requirement from the suppliers. The declaration shall be supported by a report describing in detail the procedures adopted by the suppliers in order to fulfil the requirement for each of the sites concerned.* |

# 5.1- Production of synthetic polymers and plastic materials

## Stakeholders feedback - online questionnaire (October 2020)

25% respondents expressed the need for revision:

- Lack of clarity
- One stakeholder expressed to remove this criterion:

  "*the bullet points are not relevant for all polymer or plastic production processes. An AHP may consist of 10 different plastic materials with several polymer granulate suppliers and to get detailed info from the producers is an impossible task*"

- Suggested to use a % organic or PCR (Post Consumer Recycled) → to be discussed in Criterion 8- Packaging.
- Relevant to explore the use of **bioplastics and biopolymers** inclusion

**Reference to synthetic polymers removed.**

# Criterion 5 - Production of synthetic polymers and plastic materials

| Questions to stakeholders |
| --- |
| Is it unachievable to obtain information from polymer/plastic suppliers? |
| Should this criterion be removed? (focusing more on the plastic packaging aspect) |

# 5.2 – Additives in plastic materials
# 5.3 – Superabsorbent polymers

**MOVED**

## *Existing criterion 5.2* – Additives in plastic materials

(a) Contents of lead, cadmium, hexavalent chrome and related compounds shall be lower than 0,01 % (100 ppm) of the mass of each plastic material and synthetic polymer used in the product.

(b) Additives used in plastics in concentration above 0,10 % by weight shall not be classified with any of the below listed hazard statements, in accordance with the classification rules in Regulation (EC) No 1272/2008:

— carcinogenic, mutagenic or toxic for reproduction, categories 1a, 1b and 2 (H340, H350, H350i, H360F, H360D, H360FD, H360Fd, H360Df),

— acutely toxic, categories 1 and 2 (H300, H310, H330, H304),

— toxic to specific target organs (STOT), category 1: (H370, H372),

— hazardous to the aquatic environment, categories 1 and 2 (H400, H410, H411).

## *Existing criterion 5.3* – Superabsorbent polymers

(a) Acrylamide (CAS number: 79-06-1) shall not be intentionally added to the product.

(b) Superabsorbent polymers used in the product may contain a maximum of 1 000 ppm residual monomers that are classified with the H-statements reported in criterion 7 on excluded or limited substances or mixtures. For sodium polyacrilate these represent total of unreacted acrylic acid and cross linkers.

(c) Superabsorbent polymers used in the product may, as a maximum, contain 10 % (weight/weight) of water-soluble extracts and these shall comply with criterion 7 on excluded or limited substances or mixtures. For sodium polyacrilate these represent monomers and oligomers of acrylic acid with lower molecular weight than the superabsorbent polymer according to ISO 17190.

# Criterion 6 - Other materials and components

- 6.1: Adhesive materials
- 6.2: Inks and dyes
- 6.3: Fragrances
- 6.4: Lotions
- 6.5: Silicone
- 6.6: Nanosilver particles

**REMOVED**
Sub-criteria moved to new criterion 6: Excluded and restricted substances

# Criteria 5 & 6

**Questions and comments?**

**Lunch break: 1 hour**

# Agenda

**Afternoon session: 14:00-18:00**

| | |
|---|---|
| EU Ecolabel criteria for AHPs - Revision of criteria and discussion: Criterion 6: Excluded and restricted substances | 14:00 – 15:30 |
| 15 min break | |
| EU Ecolabel criteria for AHPs - Revision of criteria and discussion:<br>Criterion 7: Material efficiency in the manufacturing<br>Criterion 8: Packaging<br>Criterion 9: Guidance on the product disposal | 15:45 – 16:45 |
| EU Ecolabel criteria for AHPs - Revision of criteria and discussion:<br>Criterion 10: Fitness for use and quality of the product<br>Criterion 11: Social aspects<br>Criterion 12: Information appearing on the EU Ecolabel | 16:45 – 17:45 |
| Conclusion, next steps and closure of the workshop | 17:45 – 18:00 |

# Criterion 6 - Excluded and restricted substances

***Existing criterion 7.1 – Hazardous substances and mixtures***

The EU Ecolabel may not be awarded if the product or any article of it, as defined in Article 3(3) of Regulation (EC) No 1907/2006 of the European Parliament and of the Council (1), or any homogenous part of it contain substances or mixtures meeting the criteria for classification with the hazard statements or risk phrases specified in table 4, in accordance with Regulation (EC) No 1272/2008 or Council Directive 67/548/EEC (2), nor they contain substances or mixtures referred to in Article 57 of Regulation (EC) No 1907/2006, unless they have been specifically derogated from.
The most recent classification rules adopted by the Union shall take precedence over the listed hazard classifications and risk phrases. Applicants shall therefore ensure that any classifications are based on the most recent classification rules.
The hazard statements and the risk phrases in table 4 generally refer to substances. However, if information on substances cannot be obtained, the classification rules for mixtures shall apply.
Substances or mixtures which change their properties through processing and thus become no longer bioavailable or undergo chemical modification in a way that removes the previously identified hazard are exempted from criterion 7.1. This shall include, for instance, modified polymers and monomers or additives, which become covalently bonded within plastics.
Concentration limits for substances or mixtures which may be or have been assigned the hazard statements or risk phrase listed in table 4, meeting the criteria for classification in the hazard classes or categories, and for substances meeting the criteria of Article 57 (a), (b) or (c) of Regulation (EC) No 1907/2006, shall not exceed the generic or specific concentration limits determined in accordance with Article 10 of Regulation (EC) No 1272/2008. Where specific concentration limits are determined they shall prevail over the generic ones.

# Criterion 6 - Excluded and restricted substances

## 6.1 Hazardous substances and mixtures

| Hazard Statement (1) |
| --- |
| H300 Fatal if swallowed |
| H301 Toxic if swallowed |
| H304 May be fatal if swallowed and enters airways |
| H310 Fatal in contact with skin |
| H311 Toxic in contact with skin |
| H330 Fatal if inhaled |
| H331 Toxic if inhaled |
| H340 May cause genetic defects |
| H341 Suspected of causing genetic defects |
| H350 May cause cancer |
| H350i May cause cancer by inhalation |
| H351 Suspected of causing cancer |
| H361f Suspected of damaging fertility |
| H361d Suspected of damaging the unborn child |
| H361fd Suspected of damaging fertility. Suspected of damaging the unborn child. |
| H362 May cause harm to breast fed children |
| H370 Causes damage to organs |
| H371 May cause damage to organs |
| H372 Causes damage to organs through prolonged or repeated exposure |
| H373 May cause damage to organs through prolonged or repeated exposure |
| H400 Very toxic to aquatic life |
| H410 Very toxic to aquatic life with long-lasting effects |
| H411 Toxic to aquatic life with long-lasting effects |
| H412 Harmful to aquatic life with long-lasting effects |
| H413 May cause long-lasting effects to aquatic life |
| EUH059 Hazardous to the ozone layer |

# 6.1 Restrictions on substances classified under CLP

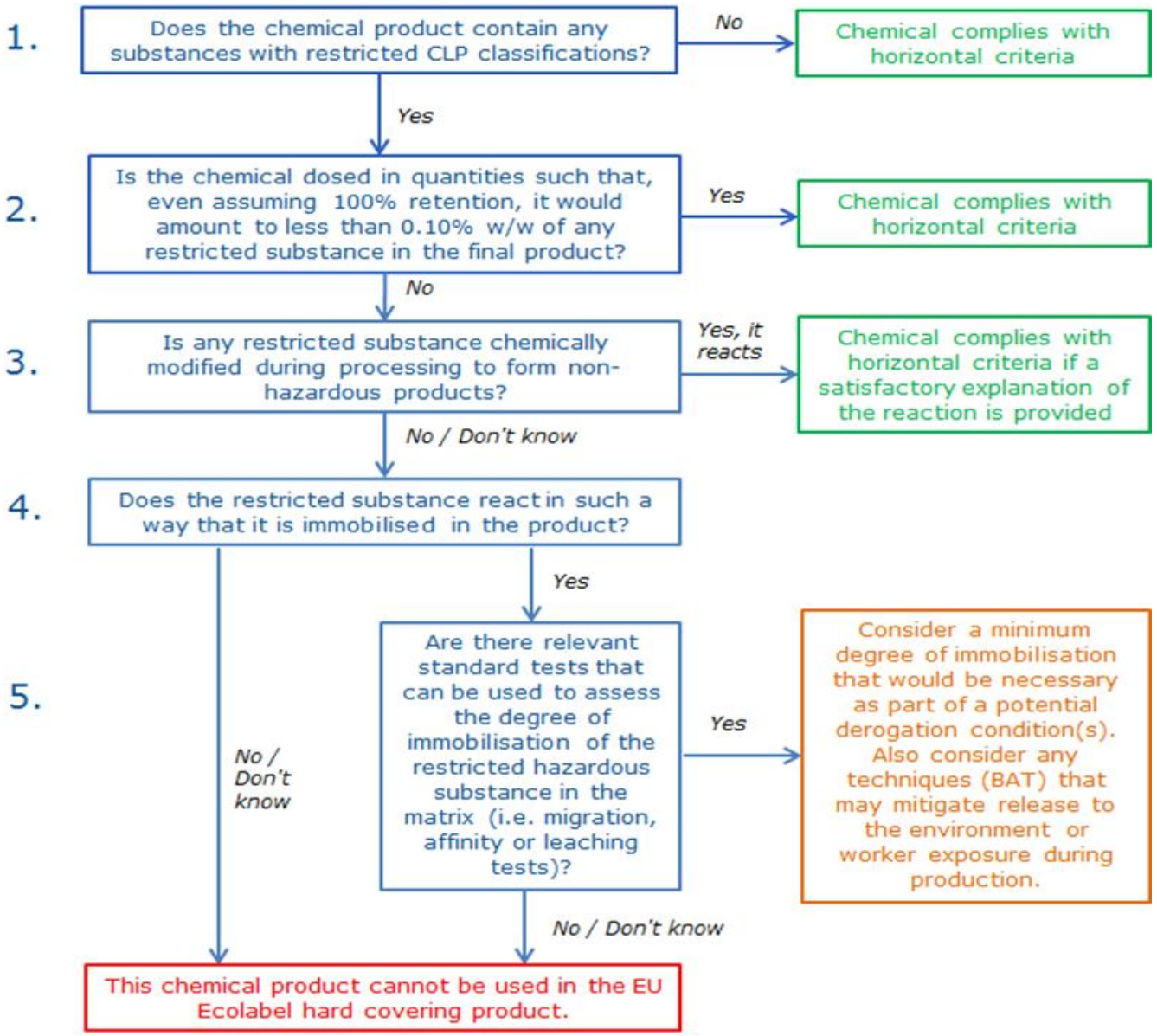
***Legal basis:***

- Group 1, Group 2 and Group 3 hazards
- Removal of risk phrases (e.g. R45, R50, etc.) linked to the Dangerous Substances Directive

***Screening process***:

- Screening guidance
- Alignment proposed with printed paper, stationery paper, and paper carrier bag EU Ecolabel products

# 6.1 Restrictions on substances classified under CLP



# 6.1 Restrictions on substances classified under CLP

***Derogations***

- Industry can submit derogation requests substantiated by data

***Assessment & Verification***

- A list of all the relevant chemicals used
- Appropriate documentation (safety data sheet and/or a declaration from the chemical supplier)

# Criterion 6 - Excluded and restricted substances

***Proposal for criterion 6.1 – Restrictions on substances classified under Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures***

**Unless derogated in Table X**, the final product, and any component articles therein, shall not contain substances or mixtures in concentrations greater than 0,10% (weight by weight) that are assigned any of the following hazard classes, categories and associated hazard statement codes, in accordance with Regulation (EC) No 1272/2008:

Group 1 hazards: Category 1A or 1B carcinogenic, mutagenic and/or toxic for reproduction (CMR): H340, H350, H350i, H360, H360F, H360D, H360FD, H360Fd, H360Df.

Group 2 hazards: Category 2 CMR: H341, H351, H361, H361f, H361d, H361fd, H362; Category 1 aquatic toxicity: H400, H410; Category 1 and 2 acute toxicity: H300, H310, H330; Category 1 aspiration toxicity: H304; Category 1 specific target organ toxicity (STOT): H370, H372; Category 1 skin sensitisation H317; Category 1 respiratory Sensitization H334.

Group 3 hazards: Category 2, 3 and 4 aquatic toxicity: H411, H412, H413; Category 3 acute toxicity: H301, H311, H331; Category 2 STOT: H371, H373.

The use of substances or mixtures that are chemically modified during the production process, so that any relevant hazard for which the substance or mixture has been classified under Regulation (EC) No 1272/2008 no longer applies, shall be exempted from the above requirement.

# Criterion 6 - Excluded and restricted substances

***Proposal for criterion 6.1 – Restrictions on substances classified under Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures***

***Assessment and verification**:*

*The applicant shall provide a list of all relevant chemicals used in their production process, together with the relevant safety data sheet or chemical supplier declaration and any relevant declarations from component article suppliers.*

*Any chemicals containing substances or mixtures with restricted classifications under Regulation (EC) No 1272/2008 shall be highlighted. The approximate dosing rate of the chemical, together with the concentration of the restricted substance or mixture in that chemical (as provided in the Safety Data Sheet or supplier declaration) and an assumed retention factor of 100%, shall be used to estimate the quantity of the restricted substance or mixture remaining in the final product.*

*Since multiple products or potential products using the same process chemicals may be covered by one license, the calculation only needs to be presented for each chemical for the worst-case product or component article covered by the EU Ecolabel license (e.g. the most heavily printed component article when screening for inks with restricted classifications).*

*Justifications for any deviation from retention factor of 100% (e.g. solvent evaporation) or for chemical modification of a restricted hazardous substance or mixture must be provided in writing to the Competent Body.*

*For any restricted substances or mixtures that exceed 0.10% (weight by weight) of the final product, or of relevant component articles therein, a relevant derogation must be in place and proof of compliance with any relevant derogation conditions must be provided*

# **Criterion 6 - Excluded and restricted substances** 6.1 Restrictions on substances classified under CLP

| **Question to stakeholders** |
| --- |
| Is there any additional clarifications needed about the proposed wording?<br>Are there any derogation requests foreseen? (note: titanium dioxide is now a pigment that would require derogation if used in quantities >0.1% of the treated article or component part). |

# Criterion 6 - Excluded and restricted substances

| ***Existing criterion 7.2 – Restrictions on Substances of Very High Concern (SVHCs)*** |
| --- |
| No derogation from the exclusion in Article 6(6) of Regulation (EC) No 66/2010 shall be given concerning substances identified as substances of very high concern and included in the list provided for in Article 59(1) of Regulation (EC) No 1907/2006, present in mixtures, in an article or in any homogeneous part of the product in concentrations > 0.10 % by weight.<br><br>***Assessment and verification:***<br>*Reference to the latest list of substances of very high concern shall be made on the date of application. The applicant shall provide a declaration of compliance with criterion 7.2, together with related documentation, including declarations of compliance signed by the material suppliers and copies of relevant SDS for substances or mixtures in accordance with Annex II to Regulation (EC) No 1907/2006 for substances or mixtures. Concentration limits shall be specified in the safety data sheets in accordance with Article 31 of Regulation (EC) No 1907/2006 for substances and mixtures.* |

# 6.2 Restrictions on SVHCs

Limit: 0,1 % (w/w) in the final product or in any component part therein

→ 0.1% threshold for SVHC and CLP restrictions apply at the *individual component level*

***ISSUES***

- If an SVHC is present in an ingoing chemical, its use is not necessarily prohibited
- ***SVHC list is dynamic:*** time for both chemical producers and applicants to find alternative

**Assessment and verification** → alignment with **printed paper**

# Criterion 6 - Excluded and restricted substances

***Proposal for criterion 6.2 – Restrictions on Substances of Very High Concern (SVHCs)***

All ingoing chemicals used in the production process by the applicant and any supplied materials that form part of the final product shall be covered by declarations from suppliers that they do not contain, in concentrations greater than 0.10% (weight by weight), substances meeting the criteria referred to in Article 57 of Regulation (EC) No 1907/2006 of the European Parliament and of the Council that have been identified according to the procedure described in Article 59 of that Regulation and included in the candidate list for substances of very high concern for authorization. No derogation from this requirement shall be granted.

**Assessment and verification**

*The applicant shall provide a declaration that the product has been produced using supplied chemicals or materials that do not contain any SVHC in concentrations greater than 0.10% (weight by weight). The declaration shall be supported by safety data sheets of process chemicals or appropriate declarations from chemical or material suppliers.*

*The list of substances identified as SVHCs and included in the candidate list in accordance with Article 59 of Regulation (EC) No 1907/2006 can be found here:*

*http://echa.europa.eu/chem_data/authorisation_process/candidate_list_table_en.asp.*

*Reference to the list shall be made on the submission date of the EU Ecolabel application.*

# Criterion 6.3 - Specific restrictions

NEW

- 6.3.a: Specified excluded substances
- 6.3.b: Fragrances
- 6.3.c: Lotions
- 6.3.d: Inks and dyes
- 6.3.e: Further restrictions applying to plastic materials
- 6.3.f: Further restrictions applying to adhesives
- 6.3.g: Super absorbent polymers (SAP)
- 6.3.h: Silicones

# Criterion 6.3 - Specific restrictions NEW

***Proposal for criterion 6.3(a) – Specified excluded substances***

The following substances shall not be present in the product, regardless of the concentration, neither as part of the product, as part of any mixture included in the product, nor as impurities:

i. 5-chloro-2-methyl-4-isothiazoline-3-one (CMIT);
ii. Acrylamide shall not be intentionally added to superabsorbent polymers.
iii. Alkyl phenol ethoxylates (APEOs) and other alkyl phenol derivatives [1]. Sterically hindered phenolic antioxidants with molecular weight (MW) >600 g/mole are allowed;
iv. Formaldehyde and formaldehyde releasers [2];
v. Methylisothiazolinone (MIT)
vi. Nanosilver
vii. Nitromusks and Polycyclic musks;
viii. Organotin compounds used as a catalysts in the production of silicone polymers
ix. Parabens;
x. Phthalates [3];
xi. Substances identified to have endocrine disrupting properties;
xii. Substances considered to be potential endocrine disruptors in category 1 or 2 on the EU's priority list of substances that are to be investigated further for endocrine disruptive effects;
xiii. Triclosan

# 6.3.a Specified excluded substances

***Alkyl phenol ethoxylates (APEOs) and other alkyl phenol derivatives***

Commonly used in products containing polymers

Not readily degradable; tend to bioaccumulate

Some degradation products very toxic to aquatic organisms, some are suspected of being endocrine disruptors

4-nonylphenol (NP) and 4-tert-octylphenol (OP) are endocrine disruptors

**Nordic Swan:** ban on APEOs and their degradation, allowing the use of sterically hindered phenolic antioxidants with molecular weight (MW) >600 g/mole.

**Proposed to align with Nordic Swan**

# 6.3.a Specified excluded substances

***Phthalates***

- Used as in adhesive formation, or to help dissolve other substances
- EU's priority list of substances that should be investigated more closely for endocrine disruption
- Some are SVHCs: DEHP, DBP, BBP, DIBP, DPP, DiPP, DHNUP

**Proposed to align with Nordic Swan:**
Ban on all phthalates

# 6.3.a Specified excluded substances

***Organotin compounds***

- Regulated under Annex XVII, point 20 of REACH

  *“dioctyltin (DOT) must not appear at more than 0.1% weight by weight of tin in feminine hygiene products”*

**Alignment with Nordic Swan and Blue Angel:** restriction on organotin compounds used as catalysts in the production of silicone polymers

# 6.3.a Specified excluded substances

***Isothiazolinones***

- Widely used as preservatives or biocides in household and industrial products. Found in tampons and sanitary pads
- Strong sensitizers and may pose ecotoxicological hazards
- Blue Angel: CMIT is banned
- EU Ecolabel for tissue paper: MIT is banned

It is proposed to ban **MIT** and **CMIT**

# 6.3.a Specified excluded substances

| Questions to stakeholders |
| --- |
| • Are absorbant hygiene products ever treated with biocidal active substances for a certain product functionality?<br>• Are absorbant hygiene products every treated with substances that themselves contain biocidal active substances for other purposes (e.g. as in-can preservatives) which could lead to them being present as residuals in the final product? |

# 6.3.a Specified excluded substances

***Substances identified to have endocrine disrupting properties***

*"exogenous substance or mixture that alters function(s) of the endocrine system and consequently causes adverse health effects in an intact organism, or its progeny, or (sub)populations"*

- Full evaluation process for endocrine disruption as regulated in PPPR, BPR and REACH - 20 compounds identified so far

Proposed to ban **identified EDs**

# 6.3.a Specified excluded substances

***Substances suspected to have endocrine disrupting properties***

- Close to 800 chemicals are known or suspected to be capable of interfering with hormone receptors, synthesis or conversion
- Series of studies commissioned by DG Environment:
- From a total of 564 chemicals, 118 substances as Category 1 or 2

**Alignment with Nordic Swan:** ban on potential endocrine disruptors in category 1 or 2 on the EU's priority list of substances that are to be investigated further for endocrine disruptive effects

# Criterion 6.3 - Specific restrictions

***Proposal for criterion 6.3(b) – Fragrances***

(i) Products marketed as designed and intended for children as well as tampons and nursing pads shall be fragrance-free.

(ii) Any ingoing substance or mixture added to the product as a fragrance shall be manufactured and handled following the code of practice of the International Fragrance Association (IFRA). The code can be found on IFRA website: http://www.ifraorg.org. The recommendations of the IFRA Standards concerning prohibition, restricted use and specified purity criteria for materials shall be followed by the manufacturer.

(iii) Fragrances and ingredients of the fragrance mixtures that are identified as established contact allergens of special concern by the Scientific Committee on Consumer Safety (*) as well as the fragrances restricted by the criteria 7.1 and 7.2 shall not be used.

(iv) The use of fragrances shall be indicated on the product packaging.

Table 13-1 of SCCS Opinion on Fragrance allergens in cosmetic products adopted in June 2012 http://ec.europa.eu/health/scientific_committees/consumer_safety/docs/sccs_o_102.pdf

**Only minor wording edits**

# 6.3.b Fragrances

| Questions to stakeholders |
| --- |
| • Should a tighter threshold limit be set for individual hazardous substances present in fragrances applied in feminine pads and panty-liners?<br>• Should the use of fragrances not be permitted in the EU Ecolabel AHP product? |

# Criterion 6.3 - Specific restrictions

| ***Proposal for criterion 6.3(c) – Lotions*** |
| --- |
| Lotions shall not be used in feminine care pads, tampons and nursing pads. The use of lotions in other products shall be indicated on the packaging. |

- As a barrier layer in baby diapers containing ointment such as vaseline and aloe vera.
- Allergens and carcinogens can occur in lotion preparations
- Lotions are not essential components of an AHP

**No changes proposed**

# Criterion 6.3 - Specific restrictions

***Proposal for criterion 6.3(d) – Inks and dyes***

Optical brighteners and colouring agents, including fluorescent whitening agents, shall not be intentionally added to the pulp used in products.

The product ~~homogeneous part of~~ and any component part thereof shall not be dyed. Derogations to this requirement shall apply to:

— tampon strings, packaging materials and tapes,

— titanium dioxide in polymers and viscose,

— materials that are not directly in contact with the skin may be dyed if the dye fulfils specific functions (e.g. reducing visibility of the product through white or light coloured clothing, showing landing zones of tapes, indicating the wetness).

~~Inks and dyes used shall also comply with Criterion 7 on excluded or limited substances or mixtures.~~

**No major changes**

**Question to stakeholders**

In what concentration is $TiO_2$ used? Are there alternatives used for $TiO_2$ used as a pigment?

# Criterion 6.3 - Specific restrictions

***Proposal for criterion 6.3(e) – Further restrictions applying to plastic materials***

(a) Contents of lead, cadmium, hexavalent chromium and related compounds shall be lower than 0.01 % weight by weight (100 ppm) of the mass of each plastic material and synthetic polymer used in the product.

(b) Additives used in plastics in concentration above 0,10 % weight by weight shall not be classified with any of the below listed hazard statements, in accordance with the classification rules in Regulation (EC) No 1272/2008 of the European Parliament and of the Council (1):

— carcinogenic, mutagenic or toxic for reproduction, categories 1a, 1b and 2 (H340, H350, H350i, H360F, H360D, H360FD, H360Fd, H360Df),

— acutely toxic, categories 1 and 2 (H300, H310, H330, H304),

— toxic to specific target organs (STOT), category 1: (H370, H372),

— hazardous to the aquatic environment, categories 1 and 2 (H400, H410, H411).

**Exception granted to additives removed**

# Old criterion 6.1 - Adhesive materials

***Existing criterion 6.1 – Adhesive materials***

Adhesive materials shall not contain any of the following substances:

— Colophony resins (CAS numbers 8050-09-7, 8052-10-6, 73138-82-6),

— Diisobutyl phthalate (DIBP, CAS number 84-69-5),

— Diisononyl phthalate (DINP, CAS number 28553-12-0),

— Formaldehyde (CAS number 50-00-0).

This requirement shall not apply if those substances are not intentionally added to the material or to the final product, and are present in the adhesive materials in concentrations below 100 ppm (0,010 % by weight).

For formaldehyde, the maximum limit for the content of formaldehyde generated during adhesive production shall be 250 ppm, measured in newly produced polymer dispersion. Content of free formaldehyde in hardened adhesive (glue) shall not exceed 10 ppm. Hotmelt adhesives shall be exempted from this requirement.

# 6.3.f Further restrictions applying to adhesives

***Colophony or rosin***

- Used in a wide variety of applications including (food contact) packaging, tape, labels, etc
- Formed by reacting Rosin (an acid) with polyfunctional alcohols (like glycerol and pentaerythritol)
- Confusion of the term ‘colophony resins’ and *adducted rosin esters*

**Nordic Swan:** “*Adhesives/binders must not contain phthalates or colophony rosin. Modified colophony derivatives that are not classified as sensitizing are allowed”*

**Proposal***:* include in this criterion that a maximum concentration of 0.1% shall be applied for colophony. Modified colophony derivatives that are not classified as sensitizers, e.g. rosin esters, are allowed.

# 6.3.f Further restrictions applying to adhesives

***Formaldehyde***

- Unclear: "*this requirement shall not apply if those substances are not intentionally added to the material or to the final product, and are present in the adhesive materials in concentrations below 100 ppm (0,010 % by weight)*" → removed
- The measurement of formaldehyde is not an easy task

| Points for discussion |
| --- |
| • Are the formaldehyde test methods correct? If not, which ones are?<br>• Is there any experience with testing of formaldehyde emissions during polymer dispersion? It may be possible that results are highly variable depending on sampling protocols and perhaps further guidance is needed for applicants. |

# Criterion 6.3 - Specific restrictions

***Proposal for criterion 6.3(f) – Further restrictions applying to adhesives***

The following substances shall not be added to adhesives used in Absorbent Hygiene Products according to the thresholds listed below:

— Colophony resins: Adhesives shall not contain more than 0.01% (weight by weight) colophony resin. Modified colophony derivatives that are not classified as sensitizers, e.g. rosin esters, are allowed;

— Formaldehyde: the content of free formaldehyde in hardened adhesive (glue) shall not exceed 10 ppm. The threshold for formaldehyde generated during adhesive production shall be 250 ppm, measured in newly produced polymer dispersion. Hotmelt adhesives shall be exempted from this requirement.

# Criterion 6.3 - Specific restrictions

| ***Proposal for criterion 6.3(g) – Super absorbent polymers (SAP)*** |
|---|
| (i) Superabsorbent polymers used in the product shall contain a maximum of 1 000 ppm residual monomers that are classified with the H-codes reported in sub-criterion 6.1. For sodium polyacrylate this limit applies to the sum of unreacted acrylic acid and cross linking agents.<br><br>(ii) Superabsorbent polymers used in the product shall, as a maximum, contain 10 % (weight/weight) of water-soluble extracts ~~and these shall comply with criterion 7 on excluded or limited substances or mixtures~~. For sodium polyacrilate these represent monomers and oligomers of acrylic acid with lower molecular weight than the superabsorbent polymer according to ISO 17190. |

**No major changes**

| Points for discussion |
|---|
| We request stakeholders to provide data on which residual monomers are used in the production of SAPs, and at which concentration |

# Criterion 6.3 - Specific restrictions NEW

| ***Proposal for criterion 6.3(h) – Silicones*** |
| --- |
| (i) ~~Where components articles of the product are treated with silicone, the manufacturer silicone supplier shall ensure that employees are protected from the solvents~~. Solvent-based silicone coatings must not be used.<br><br>(ii) Octamethyl cyclotetrasiloxane D4 (CAS 556-67-2), decamethyl cyclopentasiloxane D5 (CAS 541-02-6) and Dodecamethylcyclohexasiloxane D6 (CAS 540-97-6) shall not be present in the silicone mixture in concentrations above 800 ppm (0,08 % by weight). ~~chemical products used in the silicone treatment of components~~. ~~This requirement shall not apply where D4 and D5 are not intentionally added to the material or to the final product, and where D4 and D5 are present in the silicone in concentrations below 100 ppm (0,01 % by weight).~~ |

# 6.3.h Silicones

- Used primarily to achieve a grease- or water-repellent effect as a coating on materials or as an additive in materials.
- When they are used to produce release liners, silicone coating adheres to the material to be treated in the form of a thin layer, especially to low-porosity and smooth paper substrates.
- The first part refers to solvent-based silicones
- **Nordic Swan and Blue Angel** set a requirement prohibiting their use

**Proposal**: **to ban the use of solvent-based silicone coatings**.

# 6.3.h Silicones

Confusion over requirement (ii): *silicone mixture*.

1. cyclosiloxanes are always present in the silicone mixture before curing → current limit of 100ppm technically impossible.
2. adding D4/D5 to the release liner (material or final product) → does not happen in reality
3. 100 ppm of D4/D5 as limit in the silicone present in the release liner (feasible)

**Blue Angel:** limit at 800 ppm

**Proposal**: to add the reference to "silicone mixture"; to increase the limit of D4 and D5 to 800 ppm; to add D6 to the restriction

# Criterion 6.3 - Specific restrictions NEW

| ***Proposal for assessment and verification*** |
| --- |
| *The applicant shall provide a signed declaration of compliance with all above sub-criteria, supported by declarations from suppliers whenever relevant; and the following supporting evidence:*<br>*To demonstrate compliance with sub-criteria 6.3(a), 6.3(e), 6.3(f) and 6.3(g), the applicant shall provide:*<br>*(i) safety data sheets (SDS) of any substance/mixture and their concentration in the final product;*<br>*(ii) a written confirmation that sub-criteria 6.3(a), 6.3(e), 6.3(f) and 6.3(g) are fulfilled.*<br>*To demonstrate compliance with sub-criterion 6.3(b), the list of fragrances used and visual evidence that information has been added to the packaging shall be provided, when fragrances are used.*<br>*To demonstrate compliance with sub-criterion 6.3(c), visual evidence that information has been added to the packaging shall be provided, when lotions are used.*<br>*To demonstrate compliance with criterion 6.3(d), in case dyes are used, their presence shall be justified by indicating the specific function provided.*<br>*To demonstrate compliance with sub-criterion 6.3(f), the applicant shall also provide test results for formaldehyde.*<br>*To demonstrate compliance with sub-criterion 6.3(g), the applicant shall also provide a declaration from the supplier documenting the composition of the super absorbent polymer(s) used in the product and the quantity of water-soluble extracts in the superabsorbent polymer(s). The SDSs shall specify the residual monomers contained in the product and the quantities thereof. Recommended test methods are ISO 17190 and WSP 210. The methods used for the analyses shall be described and the names of the laboratories used for analysis shall be stated.*<br>*To demonstrate compliance with sub-criterion 6.3(h), the applicant shall provide a declaration from the silicone supplier with information on the method used to manufacture the silicone. Moreover, the applicant shall provide a declaration from the silicone supplier that requirement (ii) has been fulfilled*<br>*The above evidence may also be provided directly to competent bodies by any supplier in the applicant's product supply chain.* |

# Criterion 6

**Questions and comments?**

**Coffee break: 15 minutes**

# Criterion 7 - Material efficiency in the manufacturing

***Existing criterion 8 – Material efficiency in the manufacturing***

The quantity of waste generated during the manufacture and packaging of the products, at the net of the fraction that is reused or converted into useful materials and/or energy, shall not exceed:

— 10% by weight of the end products for tampons,

— 5% by weight of the end products for all the other products.

***Assessment and verification**:*

*The applicant shall provide evidence of the quantity of waste that has not been reused within the manufacturing process or that is not converted into materials and/or energy.*

*Calculations shall be shown in accordance with ISO 14025 and the applicant shall present all of the following parameters concerning:*

— *the weight of product and packaging,*

— *all the waste streams generated during the manufacture, and*

— *the respective treatment processing (e.g. recycling, incineration), including the fraction of recovered waste and that disposed of.*

*The net waste shall be calculated as the difference between the amount of waste produced and the amount of waste recovered.*

# Criterion 7 - Material efficiency in the manufacturing

- **Circular Economy Action Plan 2020, Green Deal**

## Stakeholders feedback – online questionnaire (October 2020)

  - Modification of the **thresholds to stricter values** (no changes proposed: more information needed)
- **CBs** were asked for thresholds reported and sources of waste
- Assessment and verification: **no changes proposed**

# Criterion 7 - Material efficiency in the manufacturing

| ***Proposal for criterion 8 – Material efficiency in the manufacturing*** |
| --- |
| The quantity of waste generated during the manufacture and packaging of the products, at the net of the fraction that is reused or converted into useful materials and/or energy, shall not exceed:<br>— 10% by weight of the end products for tampons,<br>— 5% by weight of the end products for all the other products.<br><br>***Assessment and verification****:*<br>*The applicant shall provide evidence of the quantity of waste that has not been reused within the manufacturing process or that is not converted into materials and/or energy.*<br>*Calculations shall be shown in accordance with ISO 14025 and the applicant shall present all of the following parameters concerning:*<br>*— the weight of product and packaging,*<br>*— all the waste streams generated during the manufacture, and*<br>*— the respective treatment processing (e.g. recycling, incineration), including the fraction of recovered waste and that disposed of.*<br>*The net waste shall be calculated as the difference between the amount of waste produced and the amount of waste recovered.* |

# Criterion 7 - Material efficiency in the manufacturing

| Questions to stakeholders |
| --- |
| • What should be the threshold values for the quantity of waste generated during the end-product manufacture and packaging for each AHP?<br><br>• Industry and CBs are strongly invited to submit relevant data in order to correctly shape this criterion.<br><br>• Which are the main sources of waste generated during the product manufacturing stages? |

# Criterion 8 – Packaging - NEW

- Primary packaging (sales packaging): packaging conceived so as to constitute a **sales unit** to the final user or consumer at the point of purchase;

- Secondary packaging (grouped packaging): packaging conceived so as to constitute at the point of purchase a **grouping of a certain number of sales units**; it can be removed from the product without affecting its characteristics.

- Transport packaging (tertiary packaging): packaging conceived so as to facilitate **handling and transport** of a number of sales units or grouped packagings.

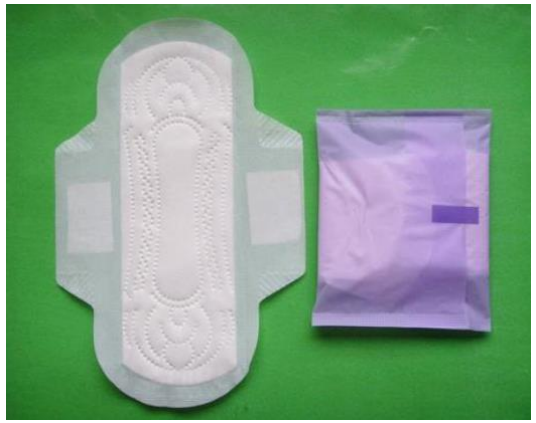
- Additional packaging: means any component (with protective or hygienic function) that is **removed before the use of the product**, e.g. the individual wrap or film where some products are contained.

# Criterion 8 – Packaging - NEW

- Primary packaging




- Additional packaging





European Commission

# Criterion 8 – Packaging - NEW

- Aim of this criterion
  - (1) incorporation of product and packaging composition: modification proposed by stakeholders in the questionnaire from December 2020
  - (2) incorporation of new marking requirements: mandatory marking



  - (3) recycled content and recyclability capacity in the composition of primary, secondary, and additional packaging.

# Criterion 8 – Packaging - NEW

| *First proposal of criterion 8 – Packaging* |
| --- |
| The primary packaging must contain information on the packaging and product composition specifying the weight of the packaging and product and of each component as requested in criterion 1. |
| The primary packaging of feminine care products such as sanitary towels or pads and tampons must comply with the marking requirements according to the Article 7 of Directive (EU) 2019/904 of the EU Parliament and the Council of 5 June 2019 on the reduction of the impact of certain plastic products on the environment (1) whose harmonised marking specifications must follow the rules laid down by Annex I of the Commission Implementing Regulation, of 17 December 2020 (Commission Implementing Regulation (EU) 2020/2151 of 17 December 2020 laying down rules on harmonised marking specifications on single-use plastic products listed in Part D of the Annex to Directive (EU) 2019/904 of the European Parliament and of the Council on the reduction of the impact of certain plastic products on the environment (2)). |
| The additional packaging must include the marking specifications also in the case of sanitary towels or pads. |
| Primary, secondary, and additional packaging shall include **X** % of recycled content in their composition, and it must be recyclable. |

# Criterion 8 – Packaging - NEW

| *First proposal of criterion 8 – Packaging* |
| --- |
| **Assessment and verification**:<br>The applicant shall submit a signed declaration of compliance specifying the product composition, supported by manufacturer documentation, including the composition of the packaging (primary, secondary and additional).<br>The applicant shall provide a sample of the primary packaging by submitting either a sample itself or a primary packaging photo (where information requested appears clearly).<br>The applicant shall submit a signed declaration of compliance specifying the percentages of recycled content and recyclability capacity in the packaging where the test methods used must be notified. Invoices demonstrating the purchase of the recycled material must be provided. |

# Criterion 8 – Packaging - NEW

| Questions to stakeholders |
| --- |
| • Should product and packaging composition be shown on the primary packaging?<br>• Which % of recycled plastic/cardboard should be set in the primary/secondary/additional packaging?<br>• Should there be a requirement on recyclability of plastic/cardboard in the primary/secondary/additional packaging? How to demonstrate it?<br>• Should there be a requirement on content of bio-material in the primary/secondary/additional packaging, similar to Nordic Swan and Blue Angel?<br>• Should there be any banned substances in primary/secondary/additional packaging? |

# Criterion 9 - Guidance on the product disposal

| ***Existing criterion 9 – Guidance on the product disposal*** |
| --- |
| The producers shall write or indicate through visual symbols on the packaging:<br>— that the product must not be flushed into toilets,<br>— how to dispose the product correctly.<br><br>***Assessment and verification****:*<br>*The applicant shall provide a sample of the packaging.* |

# Criterion 9 - Guidance on the product disposal

## Stakeholders feedback – online questionnaire (October 2020)

- **14% of the respondents** indicated the need of **revision** of this criterion.
- The vast majority of sanitary products are individually packaged: it is proposed that the indication of **not flushing into the toilet will refer to the product and packaging**.
- It is proposed to include the indication that these products should be disposed of within the **household waste**.
- It is proposed that primary and additional packaging are to be disposed of within the **recyclable waste.**
- Assessment and verification: it is proposed to require a **photograph of the primary packaging** as a proof of compliance (not a sample of product).

# Criterion 9 - Guidance on the packaging and product disposal

| ***First proposal of criterion 9 – Guidance on the packaging and product disposal*** |
| --- |
| ~~The producers shall write or indicate through visual symbols on the packaging:~~<br>The primary packaging must contain information on the guidance of the primary packaging, the additional packaging and the product disposal. The following information shall be written or indicated through visual symbols on the primary packaging:<br>— that the primary packaging, the additional packaging and the hygiene used product must not be flushed into toilets, and<br>— ~~how to dispose the product correctly.~~ that the hygiene used products should be disposed of within the household waste.<br>— that the primary packaging and additional packaging should be disposed of within the recyclable waste.<br>***Assessment and verification****:*<br>*The applicant shall provide a high resolution image of the primary packaging (where information regarding disposal appear clearly).* |

| **Question to stakeholders** |
| --- |
| • Should the requested disposal information appear in primary packaging? |

# Criteria 7, 8 & 9

**Questions and comments?**

# Criterion 10 - Fitness for use and quality of the product

## *Existing criterion 10 – Fitness for use and quality of the product*

The efficiency/quality of the product shall be satisfactory and at the least equivalent of products already on the market. Fitness-for-use shall be tested with respect to the characteristics and parameters reported in Table 5. Performance thresholds shall be matched, where these have been identified.

*Table 5*

**Characteristics and parameters describing the fitness for use of the product to be tested**

| Characteristic | | Testing practice required (performance threshold) | | | |
|---|---|---|---|---|---|
| | | Baby diapers | Feminine care pads | Tampons | Nursing pads |
| In-use tests | U1. Absorption and leakage protection (*) | Consumer panel test (Leakage occurs in less than 5 % of the product uses) | | | |
| | U2. Skin dryness | Consumer panel test (80 % of the consumers testing the product shall rate the performance as satisfactory) | | Not applicable | As for baby diapers |
| | U3. Fit and comfort | Consumer panel test (80 % of the consumers testing the product shall rate the performance as satisfactory) | | | |
| | U4. Overall performance | Consumer panel test (80 % of the consumers testing the product shall rate the performance as satisfactory) | | | |
| Technical tests | T1. Absorption and leakage protection | Absorption rate and absorption before leakage | | Syngina method | No method recommended |
| | T2. Skin dryness | TEWL, rewet method or corneometric testing | | Not applicable | No method recommended |

(*) Panty liners without a core intended to protect the feminine lingerie (light panty liners) are derogated from this requirement.

# Criterion 10 - Fitness for use and quality of the product

| *Existing criterion 10 – Fitness for use and quality of the product* |
| --- |
| **Assessment and verification:**<br>A test report shall be provided for in-use and technical tests describing test methods, test results and data used. Tests shall be carried out by laboratories certified to implement quality management systems, no matter if internal or external.<br>Tests shall be conducted for the specific type and size of products applying for the EU Ecolabel. Nevertheless, if it can be demonstrated that products have the same performance, it can be enough to test only one size or a representative mix of sizes per each product design. Special care shall be taken regarding sampling, transport and storage of the products to guarantee reproducible results. It is recommended not to blind products or repack them in neutral packaging due to the risk of altering the performance of products and/or packaging, unless alteration can be excluded.<br>Information on testing shall be made available to Competent Bodies under the respect of confidentiality issues. Test results shall be clearly explained and presented in language, units and symbols that are understandable to the data user. The following elements shall be specified: place and date of the tests; criteria used to select the products tested and their representativeness; selected testing characteristics and, if applicable, the reasons why some were not included; test methods used and their limitations if any. Clear guidelines on the use of test results shall be provided. |

# Criterion 10 - Fitness for use and quality of the product

## *Existing criterion 10 – Fitness for use and quality of the product*

**Assessment and verification**: (Continuation)

Additional guidelines for user tests.

— Sampling, test design, panel recruitment and the analysis of test results shall comply with standard statistical practices (AFNOR Q 34-019, ASTM E1958-07e1 or equivalent).

— Each product shall be assessed on the basis of a questionnaire. The test is to last at least 72 hours, a full week when possible, and shall be realised in normal conditions of use of the product.

— The recommended number of testers shall be at least 30. All the individuals participating to the survey shall be current users of the specific type/size of product tested.

— When the product is not designed specifically for a single gender, the ratio of male to female individuals shall be 1:1.

— A mixture of individuals representing proportionally different groups of consumers available on the market shall take part to the survey. Age, countries and genders shall be clearly stated.

— Sick individuals and those with a chronic skin condition should not participate in the test. In cases where individuals become ill during the course of the user trial, this is to be indicated on the questionnaire and the answers shall not be taken into consideration for the assessment.

— For skin dryness, fit and comfort and overall performance, 80 % of the consumers testing the product shall rate the performance as satisfactory, which could for instance mean that a rate above 60 is assigned by the consumer (on a quantitative scale from 1 to 100) or that the product has been assessed as good or very good (among five qualitative options: very poor, poor, average, good, very good). For absorption and leakage protection, leakage shall occur in less than 5 % of the products tested.

— The results shall be statistically evaluated after the user trial has been completed.

— External factors such as branding, market shares and advertising that may have an impact on the perceived performance of the products shall be communicated.

Additional requirements for technical tests.

— Test methods shall be based as much as possible on product-relevant, reproducible and rigorous methods.

— A minimum of five samples shall be tested. Average results shall be reported together with indication of the standard deviation.

Weight, dimensions and design features of the product shall be described and provided in accordance with criterion 1.

# Criterion 10 - Fitness for use and quality of the product

## Stakeholders feedback - online questionnaire (October 2020)

- **25%** of the respondents indicated the need for **revision**.
- The following changes are proposed at this stage:
  - Panty liners **derogation** from requirement U1.
  - Threshold for in-use test, **U1-absorption and leakage protection**: consumer panel test where **80 %** of the consumers testing the product shall rate the performance as satisfactory.
  - **Technical tests** T1 on absorption and leakage protection, biocompatibility tests and addition of a requirement for tampons on aerobic microorganism shall be discussed.

# Criterion 10 - Fitness for use and quality of the product

- Rationale behind the proposed 'assessment and verification'

- It is proposed to raise the minimum amount of consumers tested to **100 persons** for products not specifically designed for one gender.

- **All in-use tests** (absorption and leakage protection, skin dryness, fit and comfort and overall performance), shall report **80%** of the consumers testing the product performance as **satisfactory**.

- Same **test methods** used for baby diapers and feminine care pads (either in-use or technical tests) can be applied to **nursing pads**.

# Criterion 10 - Fitness for use and quality of the product

## *Proposal for criterion 10 – Fitness for use and quality of the product*

The efficiency/quality of the product shall be satisfactory and at the least equivalent of products already on the market. Fitness-for-use shall be tested with respect to the characteristics and parameters reported in Table 5. Performance thresholds shall be matched, where these have been identified.

*Table 5* - **Characteristics and parameters describing the fitness for use of the product to be tested**

| Characteristic | | Testing practice required (performance threshold) | | | |
|---|---|---|---|---|---|
| | | Baby diapers | Feminine care pads | Tampons | Nursing pads |
| In-use tests | U1. Absorption and leakage protection (*) | Consumer panel test ~~(Leakage occurs in less than 5 % of the product uses)~~ (80 % of the consumers testing the product shall rate the performance as satisfactory) | | | |
| | U2. Skin dryness | Consumer panel test (80 % of the consumers testing the product shall rate the performance as satisfactory) | | Not applicable | As for baby diapers and feminine care pads |
| | U3. Fit and comfort | Consumer panel test (80 % of the consumers testing the product shall rate the performance as satisfactory) | | | |
| | U4. Overall performance | Consumer panel test (80 % of the consumers testing the product shall rate the performance as satisfactory) | | | |
| Technical tests | T1. Absorption and leakage protection | Absorption rate and absorption before leakage | | Syngina method | As for baby diapers and feminine care pads |
| | T2. Skin dryness | TEWL, rewet method or corneometric testing | | Not applicable | As for baby diapers and feminine care pads |

(*) Panty liners ~~without a core~~ intended to protect the feminine lingerie (light panty liners) are derogated from this requirement.

# Criterion 10 - Fitness for use and quality of the product

| *Proposal criterion 10 – Fitness for use and quality of the product* |
| --- |
| **Assessment and verification:**<br>A test report shall be provided for in-use and technical tests describing test methods, test results and data used. Tests shall be carried out by laboratories certified to implement quality management systems, no matter if internal or external.<br>Tests shall be conducted for the specific type and size of products applying for the EU Ecolabel. Nevertheless, if it can be demonstrated that products have the same performance, it can be enough to test only one size or a representative mix of sizes per each product design. Special care shall be taken regarding sampling, transport and storage of the products to guarantee reproducible results. It is recommended not to blind products or repack them in neutral packaging due to the risk of altering the performance of products and/or packaging, unless alteration can be excluded.<br>Information on testing shall be made available to Competent Bodies under the respect of confidentiality issues. Test results shall be clearly explained and presented in language, units and symbols that are understandable to the data user. The following elements shall be specified: place and date of the tests; criteria used to select the products tested and their representativeness; selected testing characteristics and, if applicable, the reasons why some were not included; test methods used and their limitations if any. Clear guidelines on the use of test results shall be provided. |

# Criterion 10 - Fitness for use and quality of the product

| *First proposal of criterion 10 – Fitness for use and quality of the product* |
| --- |
| Additional guidelines for user tests. (Continuation)<br>— Sampling, test design, panel recruitment and the analysis of test results shall comply with standard statistical practices (AFNOR Q 34-019, ASTM E1958-07e1 or equivalent).<br>— Each product shall be assessed on the basis of a questionnaire. The test is to last at least 72 hours, a full week when possible, and shall be realised in normal conditions of use of the product.<br>— The recommended number of testers shall be at least ~~30~~ 100 (for products that are not specifically designed for one gender). When products are specifically designed for one gender at least 30 test subjects should be included. All the individuals participating to the survey shall be current users of the specific type/size of product tested.<br>— When the product is not designed specifically for a single gender, the ratio of male to female individuals shall be 1:1.<br>— A mixture of individuals representing proportionally different groups of consumers available on the market shall take part to the survey. Age, countries and genders shall be clearly stated.<br>— Sick individuals and those with a chronic skin condition should not participate in the test. In cases where individuals become ill during the course of the user trial, this is to be indicated on the questionnaire and the answers shall not be taken into consideration for the assessment.<br>— For all in-use tests (absorption and leakage protection, skin dryness, fit and comfort and overall performance), 80 % of the consumers testing the product shall rate the performance as satisfactory, which could for instance mean that a rate above 60 is assigned by the consumer (on a quantitative scale from 1 to 100) or that the product has been assessed as good or very good (among five qualitative options: very poor, poor, average, good, very good). ~~For absorption and leakage protection, leakage shall occur in less than 5 % of the products tested.~~<br>— The results shall be statistically evaluated after the user trial has been completed.<br>— External factors such as branding, market shares and advertising that may have an impact on the perceived performance of the products shall be communicated. |

# Criterion 10 - Fitness for use and quality of the product

| ***First proposal of criterion 10 – Fitness for use and quality of the product*** |
| --- |
| Additional requirements for technical tests. (Continuation)<br>— Test methods shall be based as much as possible on product-relevant, reproducible and rigorous methods.<br>— A minimum of five samples shall be tested. Average results shall be reported together with indication of the standard deviation.<br>— Technical tests recommended for nursing pads are the same as for baby diapers and for feminine care pads.<br><br>Weight, dimensions and design features of the product shall be described and provided in accordance with criterion 1. |

# Criterion 10 - Fitness for use and quality of the product

| Questions to stakeholders |
| --- |
| • For the in-use tests, absorption and leakage protection is the performance threshold modification appropriate?<br><br>• For nursery pads, the same methods than for baby diapers and feminine care pads are recommended, is this appropriate?<br><br>• Stakeholders' views are welcomed on :<br>  ○ Addition of biocompatibility tests (ISO).<br>  ○ Addition of specification about aerobic microorganism content in tampons.<br>  ○ Acceptance of in-house test methods. |

# Criterion 11 – Social aspects

| ***Existing criterion 11 – Social aspects*** |
| --- |
| Applicants shall ensure that the fundamental principles and rights at work as described in the International Labour Organisation's (ILO) Core Labour Standards, the UN Global Compact and the OECD Guidelines for Multi-National Enterprises shall be observed by production sites along the supply chain used to manufacture the licensed product(s). For the purpose of verification, the following ILO Core Labour Standards shall be referred to:<br>029 Forced Labour<br>087 Freedom of Association and Protection of the Right to Organise<br>098 Right to Organise and Collective Bargaining<br>100 Equal remuneration<br>105 Abolition of Forced Labour<br>111 Discrimination (Employment and Occupation)<br>138 Minimum Age Convention<br>155 Occupational safety and health<br>182 Elimination of the Worst Forms of Child Labour<br>These standards shall be communicated to production sites along the supply chain used to manufacture the final product.<br>***Assessment and verification***:<br>*The applicant shall demonstrate third party verification of compliance, using independent verification or documentary evidence, including site visits by auditors during the Ecolabel verification process for production sites in the supply chain for the licensed products. This shall take place upon application and subsequently during the license period if new production sites are introduced.* |

# Criterion 11 – Social aspects

## Stakeholders feedback - online questionnaire (October 2020)

- Some stakeholders mentioned: '***lack of clarity, high administrative burden and variation across countries/ regions/ industries'***.

- Stakeholders were asked to explain how they carry out the evaluation of the compliance with responses revealing the existence of **different ways of verification**.

- Other best practices.

- The criterion text is proposed to be **harmonised with the EU Ecolabel for footwear** (European Commission, 2016).

- This criterion should only apply to the **production site of the final AHP product**.

- Applicants must provide: **declaration of compliance, copies of other certificates (not dated >12 months) and supporting audit reports.**

- The documentation must be **certified** by private auditors qualified to assess the compliance of the AHP industry supply or by labour inspector(s) appointed by a national authority.

# Criterion 11 – Corporate Social Responsibility with regard to Labour Aspects

| ***First proposal of criterion 11 – ~~Social aspects~~ Corporate Social Responsibility with regard to Labour Aspects*** |
| --- |
| Requirements in this criterion shall apply to the final absorbent hygiene product assembly site.<br>~~Applicants shall ensure that the fundamental principles and rights at work as described in the International Labour Organisation's (ILO) Core Labour Standards, the UN Global Compact and the OECD Guidelines for Multi-National Enterprises shall be observed by production sites along the supply chain used to manufacture the licensed product(s). For the purpose of verification, the following ILO Core Labour Standards shall be referred to:~~<br>~~029 Forced Labour~~<br>~~087 Freedom of Association and Protection of the Right to Organise~~<br>~~098 Right to Organise and Collective Bargaining~~<br>~~100 Equal remuneration~~<br>~~105 Abolition of Forced Labour~~<br>~~111 Discrimination (Employment and Occupation)~~<br>~~138 Minimum Age Convention~~<br>~~155 Occupational safety and health~~<br>~~182 Elimination of the Worst Forms of Child Labour~~<br>~~These standards shall be communicated to production sites along the supply chain used to manufacture the final product.~~<br>Having regard to the International Labour Organisation's (ILO) Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, the UN Global Compact (Pillar 2), the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises, the applicant shall obtain third-party verification supported by site audit(s) that the applicable principles included in the ILO's fundamental conventions and the supplementary provisions below have been respected at the final AHP assembly site for the product. |

# Criterion 11 – Corporate Social Responsibility with regard to Labour Aspects

| ***First proposal of criterion 11 – ~~Social aspects~~ Corporate Social Responsibility with regard to Labour Aspects*** |
| --- |
| Fundamental conventions of the ILO:<br>(i) Child Labour:<br>— Minimum Age Convention, 1973 (No 138);<br>— Worst Forms of Child Labour Convention, 1999 (No 182).<br>(ii) Forced and Compulsory Labour:<br>— Forced Labour Convention, 1930 (No 29) and 2014 Protocol to the Forced Labour Convention;<br>— Abolition of Forced Labour Convention, 1957 (No 105).<br>(iii) Freedom of Association and Right to Collective Bargaining:<br>— Freedom of Association and Protection of the Right to Organise Convention, 1948 (No 87);<br>— Right to Organise and Collective Bargaining Convention, 1949 (No 98).<br>(iv) Discrimination:<br>— Equal Remuneration Convention, 1951 (No 100);<br>— Discrimination (Employment and Occupation) Convention, 1958 (No 111).<br>Supplementary provisions:<br>(v) Working Hours:<br>— ILO Hours of Work (Industry) Convention, 1919 (No 1).<br>(vi) Remuneration:<br>— ILO Minimum Wage Fixing Convention, 1970 (No 131);<br>— Living wage: The applicant shall ensure that wages paid for a normal working week shall always meet at least legal or industry minimum standards, are sufficient to meet the basic needs of personnel and provide some discretionary income. Implementation shall be audited with reference to the SA8000 guidance on 'Remuneration'.<br>(vii) Health & Safety:<br>— ILO Safety in the use of chemicals at work Convention, 1981 (No 170);<br>— ILO Occupational Safety and Health Convention, 1990 (No 155). |

# Criterion 11 – Corporate Social Responsibility with regard to Labour Aspects

| ***First proposal of criterion 11 – ~~Social aspects~~ Corporate Social Responsibility with regard to Labour Aspects*** |
| --- |
| In locations where the right to freedom of association and collective bargaining are restricted under law, the company shall recognise legitimate employee associations with whom it can enter into dialogue about workplace issues.<br>The audit process shall include consultation with external stakeholders in local areas around sites, including trade unions, community organisations, NGOs and labour experts. The applicant shall publish the aggregated results and key findings from the audit online in order to provide evidence of their supplier's performance to interested consumers.<br><br>**Assessment and verification**:<br>~~The applicant shall demonstrate third party verification of compliance, using independent verification or documentary evidence, including site visits by auditors during the Ecolabel verification process for production sites in the supply chain for the licensed products. This shall take place upon application and subsequently during the license period if new production sites are introduced.~~<br>The applicant shall provide a declaration of compliance together with copies of certificates and a supporting audit reports for each final product assembly plant for the model(s) to be ecolabelled.<br>The third-party site audit shall be carried out by private auditors qualified to assess the compliance of the AHP industry supply chain with social standards or codes of conduct or, in countries where the ILO Labour Inspection Convention, 1947 (No 81) has been ratified and ILO supervision indicates that the national labour inspection system is effective and where the scope of the inspection systems covers the areas listed above, by labour inspector(s) appointed by a national authority.<br>Certificate(s), not dated more than 12 months prior to the application, from schemes or processes that audit compliance with the applicable principles of the listed fundamental ILO conventions, together with the supplementary provisions on working hours, remuneration and health and safety, shall be accepted. ILO NORMLEX (http://www.ilo.org/dyn/normlex/en) and supporting guidance. |

# Criterion 11 – Corporate Social Responsibility with regard to Labour Aspects

| Questions to stakeholders |
| --- |
| • Should the criterion verification refer to the final Absorbent Hygiene Product assembly (manufacturing site)?<br><br>• Should the criterion welcome a non-exhaustive list of acceptable proofs (Sustainability reports, Corporate policies, ISO-certificates) as well? |

# Criterion 12 - Information appearing on the EU Ecolabel

| ***Existing criterion 12 – Information appearing on the EU Ecolabel*** |
| --- |
| The EU Ecolabel logo shall be applied on the packaging of the product. Box 2 of the EU Ecolabel shall contain the following text:<br>— ‘Reduced impacts from consumption of resources’,<br>— ‘Restricted use of hazardous substances’,<br>— ‘Performance and quality tests satisfied’.<br>The following text should moreover appear on the packaging: ‘For more information on why this product has been awarded the EU Ecolabel, please visit http://ec.europa.eu/environment/ecolabel/’.<br><br>***Assessment and verification***:<br>*The applicant shall provide a declaration of compliance with the requirement and visual evidence.* |

# Criterion 12 - Information appearing on the EU Ecolabel

## Stakeholders feedback - online questionnaire (October 2020)

- **43% of respondents considered the criterion adequate**. The update of the existing statements that appear on the primary packaging was requested as it has been proposed.

- According to Article 8 (3b) of the EU Ecolabel Regulation 66/2010, **three key environmental characteristics of the EU Ecolabel product** may be displayed in the optional label with text box. 'Guidelines for the use of the EU Ecolabel logo' - logo_guidelines.pdf (europa.eu).

- Wording **harmonised with the most recently voted product group** (Cosmetic products and animal care products).

- Visual evidence: **high resolution image**.

# Criterion 12 - Information appearing on the EU Ecolabel

***First proposal of criterion 12 – Information appearing on the EU Ecolabel***

The optional EU Ecolabel logo shall be applied on the primary packaging of the product. The optional label with box shall contain the following text:

— ~~'Reduced impacts from consumption of resources',~~

— 'Restricted use of hazardous substances',

— 'Product designed to reduce environmental impact',

— 'Verified performance'.

The applicant shall follow the instructions on how to properly use the EU Ecolabel logo provided in the EU Ecolabel Logo Guidelines:
http://ec.europa.eu/environment/ecolabel/documents/logo_guidelines.pdf

***Assessment and verification**:*

*The applicant shall provide a declaration of compliance with the requirement and visual evidence (photograph of the product). The photograph provided must be a high resolution image of the product packaging that clearly shows the label, the registration/licence number and, where relevant, the statements that can be displayed together with the label.*

# Criteria 10, 11, 12

**Questions and comments?**

# Next steps

- Stakeholders can provide comments on technical report and criteria proposals not later than 29th October 2021
- Comments need to be submitted word file or using the BATIS system.
- Feb/March 2022: TR2.0 publication
- April 2022: 2nd AHWG meeting

# Keep in touch

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# Thank you





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