



**1st Ad-Hoc Working Group (AHWG) meeting for the revision of
EU Ecolabel criteria for the product group:**

Absorbent Hygiene Products (AHP)

14th October 2021

Online Meeting (Webex)

**Presentation about policy and project background, product
group scope and definition, and revised criteria proposals**

Minutes of the meeting

DRAFT

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Agenda

14/10/2021

Morning session: 08:45-13:00 h CEST

		SCHEDULE
1.	Opening of virtual room and welcome of participants	08:45 – 09:00
2.	Political objectives of the EU Ecolabel and process description	09:00 – 09:10
3.	Revised scope and definitions Background information, market analysis, LCA screening study	09:10 – 10:00
4.	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	
5.	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
6.	EU Ecolabel criteria for AHPs - Revision of criteria and discussion: Criterion 5: Plastic materials and superabsorbent polymers	12:15-13:00

Afternoon session: 14:00-18:00 h CEST

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

List of participant organizations

Abena Produktion
AFNOR Certification
BASF
BEUC, EEB
CB Austria
CB Belgium
CB Bulgaria
CB Denmark
CB Finland
CB France
CB Norway
CB Sweden
Cefic
Consumer Goods Adhesives
Drylock Technologies s.r.o.
CORMAN S.p.A.
EC- DG JRC
EC- DG ENV
EDANA
ENCE
EPIS- European Pulp Industry Sector
Essity Hygiene & Health AB
Evonik
European Bioplastics
EY for ADEME (France)
DGCCRF (Direction générale de la Consommation, de la Concurrence et de la Répression des Fraudes
– General directorate for consumer affairs, competition and fraud repression)
FSC
Gapac
Generation Plume
Glatfelter
GROUP'HYGIENE
HARP associates
Hysalma - Hygiene, Sales + Marketing GmbH
Indas
International Paper
ISPRA Ambiente
ITASA
J&J
Klabin
Kraton
Lenzing
Lohmann & Rauscher GmbH
Lune Group
Me Luna GmbH
Mondi Goup
NSE- Nippon Shokubai Europe N.V.
Ministry of the Environment of Estonia
P&G
PCBC
PEFC
Stora Enso
UPM
VKI - Austrian Consumer Association (CB AT)

Note to readers

The meeting was run in a web meeting format using the WEBEX platform. For each agenda point, a short presentation was given by JRC. Participants were asked to comment/ask questions orally. During the meeting the oral questions were addressed by JRC.

Introduction

Introductory points

The JRC briefly explained the policy background to the EU Ecolabel as part of the wider sustainable production and consumption policy of the European Commission (EC). Other aspects covered were:

- *the description of criteria development process;*
- *project background and timeline;*
- *revised scope and definition;*
- *categorisation*
- *methodology for scope expansion;*
- *market and environmental analysis;*
- *LCA screening study; and*
- *summary of current and proposed changes to criteria.*

Stakeholder discussion:

A stakeholder mentioned the need to clarify some points in the reports about silicones as there is no official definition of medical grade silicone.

There was a stakeholder who asked about the possible inclusion of reusable alternatives in the scope due to the environmental benefits of reusable alternatives. As explained by JRC, reusable options (for feminine care and baby diapers) were assessed in the methodology however did not fulfilled the score to be included, only reusable menstrual cups did.

A stakeholder explained NGOs are working on reusable baby diapers and although they currently present a niche market, interest is raising due to durability, less chemicals or less waste production. This stakeholder supported the inclusion of reusable menstrual cups in the scope. JRC highlighted that reusable baby diapers are made from textiles and for this reason, they cannot really be targeted in the Absorbent Hygiene Products (AHP) group.

A stakeholder asked a clarification regarding reusable menstrual cups as they also differ from the main AHP product group and mentioned that an LCA approach would need to set very different system boundaries on reusable and disposable AHP. An LCA for reusable menstrual cups would also be needed.

A stakeholder welcomed the inclusion of reusable menstrual cups and stressed that reusable feminine pads are included in the Austrian Textiles Ecolabel while reusable baby diapers are interesting as the market is raising but the concern is the validity period. JRC explained that the validity period could be up to 8 years with the possibility to be revised before that time.

The question on a hybrid scope was raised by a stakeholder.

JRC also highlighted textiles will have other environmental impacts anyway, the user manual for AHP would also shed more light on the reusable options to be included under textile EU Ecolabel and in any case to be in touch for any additional data/discussion.

Criterion 1- Product Description

The JRC presented the proposal for criterion 1- Product Description that was to be maintained with minor revisions.

Stakeholder discussion:

Several stakeholders showed their support on keeping this criterion. One stakeholder asked to indicate if the product is TCF (Total Chlorine Free).

A stakeholder suggested the product description must be as well on the product websites in order to allow customers to read the product description before any online purchase.

Criterion 2- Fluff Pulp

The JRC presented the proposal for the five sub-criteria: sourcing, bleaching, optical brighteners and colouring agents (to be moved under criterion 6), emissions of COD and P to water and S compounds and NO_x to air and emissions of CO₂ from production.

Stakeholders were asked:

2.1 - Sourcing: agreement on the proposed ambition level for fluff pulp (70% from sustainable forestry management principles), requirement on sustainable fibre sourcing to be harmonised with other EU Ecolabel criteria for paper based products, e.g. EU Ecolabel for graphic paper, tissue paper, and tissue paper products and use of recycled fibre in a final product.

2.2 – Bleaching- proposed EU Ecolabel for AHP AOX limit of 0.15 kg/ADt for each individual pulp in a mixture.

2.4 – Emissions of COD, P, S, NO_x: slightly lowered in the proposal. Harmonisation with EU Ecolabel on graphic paper, tissue paper, and tissue paper products.

2.5 – Emissions of CO₂: No changes in the criteria text are proposed at this point as further information should be gathered on reference values for CO₂ emissions from different energy sources. It is proposed to largely harmonise the assessment and verification with criterion 1(c) of Annex II of the Commission Decision (EU) 2019/70.

Stakeholder discussion:

Split opinions were shared about proposals to sub-criteria in criterion 2.

First stakeholder to share opinion disagreed on thresholds for AOX emissions and mentioned that 85 % of fluff pulp comes from SE USA, where the situation differs to Europe. In the USA, there is a very specific situation with high humidity which should be taken into account. He asked why AOX level is so important and why not to test for dioxins. Stakeholder mentioned that ANSES study measured dioxins in the final product (baby diapers) and assumed they came from the fluff pulp (a natural material) without differing if the fluff pulp was ECF/TCF, however that link between bleaching and dioxins has not been proved.

JRC asked why most of the fluff pulp comes from the US.

Stakeholder explained it is due to the different properties of the fibres: while fibres from the North of Europe are shorter and thinner (good for paper), the US fibres are longer and more appropriate for fluff pulp for absorbent hygiene products such as baby diapers.

JRC acknowledged the higher fluff pulp production from the US, however explained that in Europe the BREF- regulation must be applied following the BAT. Pulp manufacturing in US is not comparable; the information is not publicly disclosed. If technology in the US is different from Europe (where BREF applied and graphic paper BAT has been followed) maybe a discussion should focus on that. Regarding the ANSES study, this did not showed a correlation between dioxins and fluff pulp. A possible solution would be to test for dioxins, however JRC does not know the price of this test so information was welcome but also it was out of the aim of the EU Ecolabel to add more burden to companies.

Another stakeholder agreed on sourcing criterion and encouraged harmonisation with graphic pulp. Both mix credit and mix percentage should be approved, however they questioned the safety of recycled fibres. Also the rationale of the bleaching to be expanded. Regarding emissions, they wondered about the different levels for different pulps, and pointed the missing of unbleached and CTMB bleached pulp. They would suggest to modify the factor from 1.3 to 1.5 (page 28 of Technical Report) as these values leave no room for converting. Concerning, CO₂ emissions they thought JRC should not say what energy to use and also the fact that nuclear energy was missing.

JRC was actually asking if the utilisation of recycled fibres could be of application but of course the key issue is the safety of the product. About emissions, the values are the same as the ones approved by Cefi for graphic paper. Stakeholder answered that in graphic paper there is no converting pulp thus making the process different. JRC agreed on continuing the discussion outside the meeting to understand better as to JRC knowledge there was not unbleached pulp used in the final product (but unbleached was used in tissue paper).

Next stakeholder mentioned that as most of fluff pulp comes from US, an analysis of the US fluff pulp situation is missing. JRC should go further and study the emissions and that hopefully US producers could provide with data. JRC welcomes data from the US because now there is no robust information to justify the changes. Same stakeholder agreed on the harmonisation with graphic paper but the 70% certification seems like a quite high value for this fluff pulp. Percentage and credit systems are both accepted. About bleaching, a declaration that Chlorine gas is not used would be enough, otherwise test methods would be too much for each fluff pulp, because all producers would need to provide that information. If dioxins would be tested, that would prove that there is no chlorine used. There was a bit of confusion about the pulp mix as only in special cases before the diapers machines the pulps are mixed. Unbleached pulp is used. Also about CO₂ emissions, a written explanation as how it is done in Nordic Swan could be shared. Factors for CO₂ need to be harmonised with graphic paper.

Another stakeholder commented on the added difficulty of checking the traceability of recycled fibres.

JRC asked how the verification would be done in case that recycled fibres are not allowed and if there is a special safety regulation that prevent recycled fibres to be used in AHP considering that for instance recycled content is allowed in toilet paper.

A stakeholder disagreed to lower AOX value.

Another stakeholder explained it did not understand the reason to harmonise the criterion with graphic paper as fluff pulp does not come from EU. Also the reduction of different emissions is quite too much. Pointed the pulp used in one diaper cannot be mixed so there is only one pulp quality running in the machine (dry process). Regarding recycled fibres: all producers of baby diapers have very high product safety measures which do not allow recycled fibres. Recycled fibres are not even allowed in the close contact to contact with skin layer, because of the risk of migration. This is an industry best practice (not a regulation) which cannot be modified.

JRC explained that the criterion focuses on pulping process and not in fluff pulp making, so that was the reason to harmonise with graphic paper. However, the technology is the same regardless of the location of the pulp manufacturing plant.

Stakeholder asked that they would come back with more information while US suppliers should send their information.

Regarding sourcing, a stakeholder mentioned that the change to 70% certified pulp is a good step towards 100%. Looking at AOX, it is mentioned that not only the ANSES report found dioxins in AHP but also the organisation Sixty Millions, the documentary 'Your closest enemy' and a German TV channel performing tests on tampons and baby diapers. These results indicated the need to change the criterion. It is pointed that Figure 2 in Technical Report showed that there were plants complying with a lower AOX value since 2015 thus showing the possibility to go stricter (desired value of 0.1 kg AOX/ADt). Update of machinery and use of chemicals are maybe issues. The pulp from US lacks in emissions transparency while there are a few pulp fluff producers in Europe compliant with the EU Ecolabel requirement proposals.

JRC shared views on previous discussion from the graphic paper EU Ecolabel and strengthen that AOX is just one sub-criterion but producers will have to comply with some more so if restrictions are set too high, the situation could be ending up without any industry able to comply with all the requirements.

A stakeholder explained that the main issue is the difference in the technology widely used in US and Europe for instance the wastewater treatment. There is a document they could share with JRC where explanations are made. They started to engage with another standard apart from FSC and PEFC: 70% is fine. They agreed that a chlorine bleaching test is not necessary, as Cl_2 (g) is not widely used anymore. P levels are of concern as wastewater control technologies are different in the US. Nutrients as P are eliminated in Europe but not in the US where raw water entering the process may have higher P levels than what is proposed by JRC, so no supplier from US could fulfil that requirement. There are nearly 80 different sources of S emissions across a pulp mill and for so a requirement for continuous emission monitoring is not possible. This would add a lot of cost into the system without adding much value because emission values do not fluctuate that much.

JRC requested additional information about the study on the US perspective.

A stakeholder asked if criteria are applicable for TCF pulp as well. JRC answered in general yes but the sub-criterion on AOX is for ECF only.

A stakeholder highlighted that lowering the values of AOX is important as AHP are already disposable and contaminant products. EU Ecolabel should be a sustainable certificate. Although pulp comes from US, BREF-BAT should be followed. In addition, we have Green Deal, Biodiversity Strategy, etc so for instance 70% certified sourcing is the way to reach 100%.

JRC thanked for all comments and explained that for the moment being, 70% certified sourcing is the set value.

A stakeholder asked when US stopped using Cl_2 (g) for bleaching. Another stakeholder answered it was in the 1990s.

A stakeholder made comments on the suitability of pulp recycling, agreed on previous comments that recycled content is not to be used in the final product for safety reasons. About AOX and studies finding dioxins, first there is a need to understand if the level found was harmful or not and if yes, then look in all raw materials not only fluff pulp. Otherwise it seems like we want to tackle dioxins through AOX. There are producers that mix different

pulps before giving it to AHP manufacturers so also there are mixes in the dry lines. It is very important to fully understand if we are talking about criteria applied in raw materials or in the final products. This should be specified in the criteria. Another questions was why there were different levels of emissions for different pulps. If we are talking about eco-friendly, we should calculate back from the end product. With respect to the transparency from US or not knowing US pulp data, information should be studied as there is information available.

JRC thanked and clarified some points: the pulp requirements refer to pulp in the final product. If recycled fibres cannot be used in the product, they could be used for packaging. The different pulps referred to BAT in Europe. However, the US market is not fully analysed but this can be done with input from stakeholders present in the meeting.

Criterion 3- Man-made cellulose fibres and criterion 4- Cotton and other natural cellulosic seed fibres

The JRC presented the proposal for the four sub-criteria: sourcing, bleaching, optical brighteners and colouring agents (to be moved under criterion 6), and production of fibres for criterion 3 which presented many similarities to criterion 2 and as such, the level of ambition of EU Ecolabel is to be raised. The three sub-criteria: sourcing, bleaching and optical brighteners and colouring agents (also to be moved under criterion 6) for criterion 4 were summarised.

Stakeholders were asked:

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?*
- 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?*
- Should measurement frequency or test method be defined for sulphur emissions?*
- 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?*
- 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?*
- Should a description of the bleaching process (if applicable) be provided by the applicant?*

Stakeholder discussion for criteria 3 and 4:

A stakeholder expressed that for criteria on sourcing and bleaching of man-made cellulose, the same as for fluff pulp should be apply as resources are taken from the same forest. AOX threshold should be 0.1 kg/ADt. Regarding cotton, the bleaching is mainly done using hydrogen peroxide as a bleaching agent which is TCF, so maybe we should have a TCF criterion.

Another stakeholder requested a definition of man-made cellulose fibres in the section on definitions in the Technical Report. Also acknowledged the good arguments for some of the criteria changes and showed support to them. The EU Ecolabel is given to products with the best environmental performance, a small percentage of products in the market (maybe 10-15%). The reality of the sourcing is that in general there is a shortage for man-made cellulose (viscose) as there is a competition with the paper industry, there are only two companies in Europe, and all these details need to be considered and added as they would very much like to supply data. Regarding the technical documents, there are references to Nordic Swan criteria, which have been recently modified on the requirement for virgin wood sourcing and differentiation on certain wood species, this should be revised. Criteria should go towards BAT. There are not wastewater criterion in the EU Ecolabel and for fibre production wastewater is an issue. They would be happy to provide further input, also in writing.

JRC pointed to the need to know the background on the AHP supply chain from the different stakeholders to understand better their comments.

A stakeholder asked for the wording on criterion 3.2 (elemental chlorine (Cl₂) gas) and criterion 4.2 (chlorine gas). JRC answered the most correct wording should be 'elemental chlorine (Cl₂) gas' and for so it will be aligned along the document.

A stakeholder asked about viscose manufacturing and organic cotton. The LCA screening study highlighted that the manufacturing of viscose was one of the main hotspot. Then asked why COD and Zn emission were not elaborated as it is not justified in the report as there are already efforts from manufacturers to make it better. Another example is the lack of criteria on S, COD and Zn in the EU Ecolabel for textiles. JRC was asked to include these water pollution requirements from a viscose roadmap. Regarding cotton, only organic cotton farming should be allowed to guarantee the level of quality.

A stakeholder asked if by recycled fibres it is meant fibres that go into dissolved pulps or man-made fibres which are reused. Another comment in relation with sourcing, it should be harmonised with other EU Ecolabel criteria.

JRC answered that in fact, the approach is still open for recycled man-made fibres. However, the stakeholder thinks that when looking at product safety aspects, it is different, as dissolving pulp from recycled may not be manufactured. This will have to be looked at in deeper details. JRC asked for further revision and engagement with stakeholders. JRC was asked why information from licence holders was not used and the reason was only four answers from CBs were received when asked for such information. JRC took the opportunity to ask CBs to send relevant information they may have for a further analysis. A revision of latest version of ecolabels and other schemes will be performed.

A stakeholder agreed with the proposal from JRC, especially on 70% of fibres from certified forest systems and pointed out not to include the BCI cotton certification.

It was highlighted by JRC that when the percentage of a certain material is lower than 5% of the weight of the total product, the requirement on that material would not have to be fulfilled. No comments were received to this.

A stakeholder explained that there are only two viscose producers in Europe which is a low share of the global production and for so the JRC must look at other producers worldwide. COD and Zn emissions should be considered and information could be provided.

JRC thanked comments and further feedback and communications regarding viscose market will be taken. Currently TCF and ECF are both BAT so going lower than 0.1 kg AOX/ADt could be difficult if that would mean excluding 85% of the market so there is a need to be reasonable. In any case, further discussion on industry able to meet stricter requirements is welcome by stakeholders.

Criterion 5- Cotton and other natural cellulosic seed fibres

The JRC presented the requirements for criterion 5 on plastic materials and superabsorbent polymers which had three sub-criteria.

Stakeholders were asked:

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

Stakeholder discussion:

A stakeholder pointed out that depending on the final application, biodegradability would make sense and suggested to focus on bio-based content only (even if material is biodegradable). There are certification schemes to prove sustainability which could be look at. It would make sense to have a minimum bio-based or recycled share. There are not relevant toxic ingredients in bio-based non-biodegradable plastics and if biodegradable they should provide certification on eco-toxicity testing and heavy metal content.

JRC summarised that it would be more appropriate to look at bio-based non- biodegradable material. Stakeholder acknowledges that as usually AHP are not accepted by composting plants.

A stakeholder asked to get further information from polymer suppliers as this is a common practice. The requirement on plastic should remain and be more specific. In sub-criterion 5.2 the reference of 0.1% is on the material, not on the final product (this was to be discussed in the following criterion).

Another stakeholder asked a clarification about the title of the criterion and JRC mentioned the title would be 'production of polymers'. Stakeholder also asked to add the definition of polymer as a differentiation from synthetic should be made. JRC then explained this criterion would apply to synthetic and bio-based polymers.

A stakeholder asked about biomass-balanced materials, a type of material for which biomass is used to provide the energy needed for the production of such material. There are certification schemes from RSB or BICC and also there is an ISO standard under current development.

JRC acknowledged that bio-based polymer certifications are something to study further; the minimum bio-based recycled share would be more related to the criterion in packaging but mixing bio-based and recycled materials would need to be looked at; the wording, energy usage in the plant and more definitions would be added. The utilisation of bioenergy may be out of the scope of the AHP EU Ecolabel but further research would be carried out.

Criterion 6- Excluded and restricted substances

The JRC presented the criterion on excluded and restricted substances which have been highly modified in relation to the existing one. This is an horizontal criterion common to many EU Ecolabels with certain specifications for each product.

Sub-criteria 6.1 on restrictions on substances classified under CLP and 6.2 on restrictions on SVHCs (substances of very high concern) are explained before, main changes are related to wording.

Stakeholders were asked:

6.1- Is there any additional clarifications needed about the proposed wording?

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).

Highlights on criterion 6.2- 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.

Stakeholder discussion:

JRC first requested as general thought to industry to think about the SVHC chemicals they used and if they would need to request for derogations to do it in advance.

A stakeholder pointed that for AHP is not enough to regulate the chemicals used but to look at the requirements 3, 4 and 5 in Nordic Swan for sensitisers, CMRs, SVHCs, etc which have been banned. Nordic Swan requirements are needed to supplement the mandatory chemical requirements.

Another stakeholder expressed the concern on traces by consumers, specifically when looking at the wording in sub-criterion 6.1 and for so CMRs should be 0%. Concluded that EU Ecolabel for Cosmetics is more restrictive.

JRC explained that in the Chemical Task Force and as a pragmatic approach, the value of 0.1% was assumed for some chemicals in order to reach the limit of detection. However, stakeholders in the supply chain were asked to revise data sheets and provide relevant information.

A stakeholder asked if for the sub-criterion 6.1, the threshold of 0.1% could be adapted according to the hazard.

A stakeholder explained that even though the regulation says to look at the final product, it would be easier to put requirements in all the chemicals used along the supply chain.

Some final ideas were shared regarding the proportionality of the requirements and how far in the supply chain to go for the verification. A couple of stakeholders mentioned to check the chemicals added by the suppliers and compare with other ecolabels requirements such as Nordic Swan to be able to go further with the restrictions.

Then the JRC presented the sub-criterion 6.3 on specific restrictions, new sub-criterion looking at:

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

Questions to stakeholders:

- Are AHP ever treated with biocidal active substances for a certain product functionality?
- Are absorbent 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?
- In what concentration is TiO_2 used? Are there alternatives used for TiO_2 used as a pigment?
- Are the formaldehyde test methods correct? If not, which ones are?
- 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.
- We request stakeholders to provide data on which residual monomers are used in the production of SAPs, and at which concentration

Stakeholder discussion:

A stakeholder mentioned that there is some ambiguity about colophony and colophony resins as all section was about substances, but in 6.3(f) JRC should take out the word resins.

A stakeholder asked about the requirement on adhesive strip 6.3 (h). Blue Angel and Nordic Swan refers to the silicone mixtures in different ways and the wording should be modified.

JRC proposed to follow up on the silicones in a working group out of this meeting.

Another stakeholder referred that fragrances and lotions should be excluded. In particular for sub-criterion 6.3 (h) should be tailored to menstrual cups.

A stakeholder thanked the inclusion of this sub-criterion 6.3 however the fact that some points are related to on ingoing substances and others to final product substances make difficult the assessment and verification. It is not clear who should provide the information. Fragrances and lotions should not be in any product which is in close contact to the body. There is no regulation for fragrances.

A stakeholder asked if the full exclusion of isothiazolinones was considered. Fragrances and lotions should be excluded and written comments will be provided. In the EDANA AHP Voluntary Stewardship Programme there are test methods for harmful chemicals that EU Ecolabel should introduced as the Blue Angel did.

Another stakeholder raised the question on monitoring substances near the limit of detection and to check the analytical method in the EDANA Stewardship Programme.

JRC explained this was the first proposal and maybe some details are not fully clarified but in the Preliminary Report the EDANA Stewardship Programme was taken into account. Notes were taken for the rest of the comments.

Criterion 7- Material efficiency in the manufacturing, criterion 8- Packaging and criterion 9- Guidance on the product disposal

The JRC presented the criterion on material efficiency in the manufacturing which was not yet modified as further input was needed, a new criterion on packaging and criterion 9 on the guidance on the product disposal which had minor revisions.

Questions to stakeholders:

Criterion 7:

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

Criterion 8:

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

Criterion 9:

- *Should the requested disposal information appear in primary packaging?*

Stakeholder discussion:

A stakeholder acknowledged the need for a packaging criterion. A certain percentage of the packaging should be a recycled material, also bio-based and recyclable. Also for criterion 9, it is a very valuable information for consumers to get to know where to dispose the product.

A stakeholder explained that in the packaging criterion, the mandatory labelling would not need to be added in the text of the EU Ecolabel as this is a voluntary scheme. Primary packaging should have a certain percentage of recycled and bio-based content. Regarding additional packaging, also include it in the definitions and make it clearer. Criterion 9 is fine as it helps to clarify disposal.

Another stakeholder thought all these things are fine and many of them are already being implemented. However, any additional detail or printing is always a bit difficult to implement in the packaging. Some of the aspects for packaging can differ between markets. Recyclability should be defined and to which standards and possibilities to recycle.

Another stakeholder pointed that recycled material could contain some of the substances in sub-criteria 6.1 and 6.2 so when it comes to recycled material the safety should not be impacted at all and migration to the final product avoid. Then the recyclability percentages may be challenging so it would be more appropriate to give a yes or no result. When talking about bio-based, we need to address if paper carton box (cardboard) is included in the definition.

JRC explained that we all need to think where to go in a rational way in line with Circular Economy regulations. In fact, we could look at food contact recycled materials for the additional packaging but for the primary packaging there is no need to give additional burden to companies.

Criterion 10- Fitness for use and quality of the product, criterion 11- Social aspects and criterion 12- Information appearing on the EU Ecolabel

The JRC presented the last three criteria on fitness for use and quality of the product, social aspects and information appearing on the EU Ecolabel.

The fitness for use and quality of the product introduced some changes in the thresholds for in-use absorption and leakage protection tests, for nursery pads tests and asked stakeholders for input on addition of biocompatibility tests (ISO), addition of specification about aerobic microorganism content in tampons and acceptance of in-house test methods. The social aspect criterion name was modified to 'Corporate Social Responsibility with regard to Labour Aspects' and it was aligned with the same criterion in other EU Ecolabels while the criterion 12 on Information appearing on the EU Ecolabel was also aligned with the last voted product group (Cosmetic products and animal care products).

Questions to stakeholders:

Criterion 10:

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

Criterion 11

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

Stakeholder discussion:

A stakeholder emphasised that currently there was no focus on requirements for reusable products and requested to provide them in the next proposal.

A stakeholder showed interest on a follow up discussion on silicones and asked how to join such a group discussion. JRC will send further details.

Next steps

The JRC thanked the participants for their time and contributions and explained 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 (html).*
- *JRC to publish the presentation used during the day as soon as possible.*

Main items for 2022:

- *Feb/March 2022: TR2.0 publication.*
- *April 2022: 2nd AHWG meeting.*

Note to readers

An email was sent to stakeholders the following day of the meeting where:

- Presentation was made available via BATIS or website <https://susproc.jrc.ec.europa.eu/product-bureau//product-groups/415/documents>.
- A working group on silicones was announced: stakeholders could confirm interest not later than 22nd October 2021.
- Information on deadline for comments was reminded.