EN

ANNEX I

EU Ecolabel criteria for awarding the EU Ecolabel to absorbent hygiene products

Assessment and verification requirements

For the EU Ecolabel to be awarded to a specific product, applicants must comply with each requirement.

Specific assessment and verification requirements are indicated within each criterion.

Where the applicant is required to provide declarations, documentation, analyses, test reports, or other evidence to show compliance with the criteria, these may originate from the applicant and/or their supplier(s) as appropriate.

Competent Bodies shall preferentially recognise attestations that are issued by bodies accredited in accordance with the relevant harmonised standard for testing and calibration laboratories, and verifications by bodies that are accredited in accordance with the relevant harmonised standard for bodies certifying products, processes and services. Where appropriate, test methods other than those indicated for each criterion may be used if the competent body assessing the application accepts their equivalence.

Where appropriate, competent bodies may require supporting documentation and may carry out independent verifications.

Changes in suppliers and production sites pertaining to products to which the EU Ecolabel has been granted shall be notified to Competent Bodies, together with supporting information to enable verification of continued compliance with the criteria.

As pre-requisite, the product must meet all respective legal requirements of the Member State in which the product is intended to be placed on the market. The applicant shall declare the product's compliance with this requirement.

The following information shall be provided to the competent body:

- a description of the product, together with the weight of the individual product units and the total weight of the product;

- a description of the primary packaging, together with its total weight, if applicable;

- a description of the secondary packaging, together with its total weight;

- a description of the additional components, together with its total weight;

- the components, materials and additives used in the product with their respective weights and, whenever applicable, their respective CAS numbers.

A written confirmation from the applicant that all the criteria are fulfilled shall also be required for the assessment.

For the purposes of this Annex, the following definitions shall apply:

(1) ‘Additional component’ 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 absorbent hygiene products are contained within the primary packaging (mainly for tampons and sanitary pads), the release liner or paper in baby diapers and sanitary pads, or the applicator for tampons. The additional component can also be the cloth bag were menstrual cups are usually sold with.

(2) 'Cellulose pulp' means a fibrous material mainly composed of cellulose and obtained from the treatment of lignocellulosic materials with one or more aqueous solutions of pulping and/or bleaching chemicals.

(3) ‘Impurities’ means residuals, pollutants, contaminants etc. from production, including the production of raw materials, that remain in the chemical product in concentrations less than 100 ppm (0,0100 w-%, 100 mg/kg). *[to be added to the User Manual: Examples of impurities are residues of the following: residues or reagents including residues of monomers, catalysts, by-products and detergents for production equipment and carry-over from other or previous production lines.]*

(4) ‘Ingoing substance’ means all substances included in the final product, including additives (e.g. preservatives and stabilisers) in the raw materials. Substances known to be released from ingoing substances (e.g. formaldehyde and arylamine) are also regarded as ingoing substances.

(5) ‘Man-made cellulose fibres’ means fibres produced from the raw material cellulose (wood or cotton) which include viscose, modal, lyocell, cupro and triacetate.

(6) 'Plastic materials', also referred to as 'Plastics', means polymeric materials to which additives may have been added. The definition includes polymer-based rubber items and bio-based and biodegradable plastics regardless of whether they are derived from biomass or are intended to biodegrade over time.

(7) ‘Primary packaging’, also known as sales packaging, means packaging conceived so as to constitute a sales unit to the final user or consumer at the point of purchase.

(8) ‘Product unit’ means the smallest item that can be used by the consumer and that fulfils the product’s function.

(9) ‘Recyclability capacity’ means the amount (mass or percentage) of an item available for recycling.

(10) ‘Recycled content’ means the amount of an item (by area, length, volume or mass) sourced from post-consumer and/or post-industrial recycled material.

(11) ‘Recycling’ means, in accordance with Article 3 of Directive 2008/98/EC of the European Parliament and of the Council[1], any recovery operation by which waste materials are reprocessed into products, materials or substances whether for the original or other purposes. It includes the reprocessing of organic material but does not include energy recovery and the reprocessing into materials that are to be used as fuels or for backfilling operations’.

[1] Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02008L0098-20180705&from=EN

(12) ‘Secondary packaging’ means grouped packaging, i.e. packaging conceived so as to constitute at the point of purchase a grouping of a certain number of sales units whether the latter is sold as such to the final user or consumer or whether it serves only as a means to replenish the shelves at the point of sale; it can be removed from the product without affecting its characteristics.

(13) ‘Substances identified to have endocrine disrupting properties’ means substances which have been identified to have endocrine disrupting properties (human health and/or environment) according to Article 57(f) of Regulation (EC) No 1907/2006 of the European Parliament and of the Council (candidate list of substances of very high concern for authorisation), or according to Regulations (EU) No 528/2012([2]) or (EC) No 1107/2009([3]) of the European Parliament and of the Council.

(14) 'Super absorbent polymers' means synthetic polymers designed for absorbing and retaining large amounts of liquid compared to their own mass.

(15) 'Synthetic polymers' means macromolecular substances other than cellulose pulp intentionally obtained either by:

- A polymerisation process such as poly-addition or poly-condensation or by any other similar process of monomers and other starting substances;
- Chemical modification of natural or synthetic macromolecules;
- Microbial fermentation.

(16) ‘Transport packaging’, also known as tertiary packaging, means packaging conceived so as to facilitate handling and transport of a number of sales units or grouped packagings in order to prevent physical handling and transport damage. Transport packaging does not include road, rail, ship and air containers.

[2] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02012R0528-20210610

[3] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32009R1107

Criterion 1: Fluff Pulp

This criterion applies to fluff pulp that represents ≥ 1% w/w of the final product.

Criterion 1.1: Sourcing of fluff pulp

All (100%) wood raw materials used for the production of the fluff pulp shall be covered by valid chain of custody certificates issued by an independent third party certification scheme such as FSC, PEFC or equivalent.

Moreover, a minimum of 70 % of the wood raw materials used for the production of the fluff pulp 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 the wood raw materials used for the production of the fluff pulp 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.

***Assessment and verification**:*

The applicant shall provide the competent body with a declaration of compliance supported by a valid, independently certified chain of custody certificate for all wood raw materials used in the product or production line. FSC, PEFC or equivalent schemes shall be accepted as independent third-party certification.

In addition, the applicant shall provide audited accounting documents that demonstrate that at least 70 % of the wood raw materials used for the production of the fluff pulp is defined as certified material according to valid FSC, PEFC or equivalent schemes. If the fluff pulp is used in air-laid, then the air-laid supplier shall allocate credits to the air- laid delivered to the product, providing invoices to support the number of credits allocated.

If the product or production line includes uncertified virgin material, proof shall be provided that the content of uncertified virgin material does not exceed 30 % and is covered by a verification system that ensures that it is legally sourced and meets any other requirement of the certification scheme with respect to uncertified material.

In case the certification scheme does not specifically require that all virgin material is sourced from non-GMO species, additional evidence shall be provided to demonstrate this.

Criterion 1.2: Bleaching of fluff pulp

This sub-criterion does not apply to total chlorine free (TCF) pulp.

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

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

***Assessment and verification**:*

The applicant shall provide a declaration of compliance with this criterion. The declaration shall be supported by a test report performed using the ISO 9562:2004 test method, including the AOX emissions relative to the ECF-bleached pulp, expressed as kg AOX/ADt pulp. In case different pulp grades are used, the applicant shall provide the individual AOX emission

corresponding to each pulp. Equivalent methods may be accepted as test methods if considered equivalent by a third-party, and must be accompanied by detailed calculations showing compliance with this requirement and related supporting documentation.

Measurements of AOX emissions 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 AOX emissions shall be expressed as the annual average from at least 12 measurements taken at least every month. 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. 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 (ECF bleaching). AOX does not need to be measured in the effluent from pulp production without bleaching or where bleaching is performed with chlorine-free substances.

The applicant shall also provide a declaration from the pulp manufacturer that elemental chlorine (Cl_2) gas was not used.

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

Criterion 1.3: Emissions of COD and phosphorous (P) to water and of sulphur compounds (S) and NOx to air from the production of fluff pulp

The emissions to air and water from the pulp production shall be expressed in terms of points (P_{COD}, P_P, P_S, P_{NOx}). Points are calculated by dividing actual emission by the reference values reported in Table 1.

— None of the individual points P_{COD}, P_P, P_S, P_{NOx}, shall exceed 1.5;

— The total number of points ($P_{total} = P_{COD} + P_P + P_S + P_{NOx}$) 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 are given in Table 1. Finally, the total emissions shall be divided by the total reference value as shown in the following formula for COD:

$$P_{COD} = \frac{COD_{total}}{COD_{ref,total}} = \frac{\sum_{i=1}^{n}\left[pulp_i \times COD_{pulp,i}\right]}{\sum_{i=1}^{n}\left[pulp_i \times COD_{ref,pulp,i}\right]}$$

Table 1. Reference values for emissions from different pulp types. CTMP = chemi-thermomechanical pulp; NSSC = neutral sulphite semi-chemical pulp

	Reference values (kg/ADT)			
	COD_{ref}	**P_{ref}**	**S_{ref}**	**NOx_{ref}**
Bleached chemical pulp (others than sulphite)	16,0	0,030([1]) 0,09 ([2])	0,35	1,5

Bleached chemical pulp (sulphite)	24,0	0,03	0,6	1,5
Unbleached chemical pulp	6,5	0,02	0,35	1,5
CTMP ([3])	15,0	0,01	0,2	0,3
NSSC ([4])	11	0,02	0,4	1,5

([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:

The applicant shall provide detailed calculations and test data showing compliance with this criterion, together with related supporting documentation that include test reports using the following continuous or periodical monitoring standard test methods: COD: ISO 15705 or ISO 6060; Total P: EN ISO 6878; 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. Test methods whose scope and requirement standards is considered equivalent to the one of the named national and international standards and whose equivalency have been confirmed by an independent third party shall be accepted. Rapid tests can also be used to monitor emissions as long as they are checked regularly (e.g. monthly) against the relevant aforementioned standards or suitable equivalents.

In the case of COD emissions, continuous monitoring based on analysis of total organic carbon (TOC) shall be accepted as long as a correlation between TOC and COD results has been established for the site in question.

The minimum measurement frequency, unless specified otherwise in the operating permit, shall be weekly for COD emissions and Total P emissions. Emissions of S and NOx shall be measured at least every six months, in addition to any measurements stipulated in the regulatory requirements.

Data shall be reported as annual averages except in cases where:

— the production campaign is for a limited time period only,

— the production plant is new or has been rebuilt, in which case the measurements shall be based on at least 45 subsequent days of stable running of the plant.

Measurement results shall be representative of the respective campaign and a sufficient number of measurements shall have been taken for each emission parameter. The supporting documentation shall include the measurement frequency and calculation of the points for COD, Total P, S and NOx.

Measurements of 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.

Emissions to air shall include all emissions of S and NOx that occur during the production of pulp, including steam generated outside the production site, minus any emissions allocated to the production of electricity. In cases where co-generation of heat and electricity occur at the same plant, the emissions of S compounds and NOx resulting from on-site electricity generation can be subtracted from the total amount. The following equation shall be used to calculate the proportion of the emissions resulting from heat generation:

2 × (MWh(electricity))/[2 × MWh(electricity) + MWh(heat)]

The electricity in this calculation is the electricity produced at the co-generation plant. The heat in this calculation is the net heat delivered from the co-generation plant to the pulp production.

Measurements of S compounds and NOx shall include recovery boilers, lime kilns, steam boilers and destructor furnaces for strong smelling gases. Diffuse emissions shall also be taken into account.

[to be included in the User Manual:

The following diffuse sources should at least be considered:

- *For CNCG: Batch cook blowing, batch cook gassing, continuous cooking, stripper, evaporation plant, methanol processing, black liquor heat treatment, super concentrator;*
- *For DNCG: Vent gases from continuous cooking, vent gases from superbatch cooking (evacuation air, vents from non-pressurised tanks), pulp washing plant vent gases, tall oil cooking plant vent gases, tank vent gases, evaporation plant (atmospheric pressure tanks), causticising plant lime kiln area.*

The following streams should not be considered: ventilation air from buildings, moist water vapour from pulp or paper machines, moist air from cooling towers, water vapour from the surface of effluent treatment ponds, ventilation from drains, and vapour from vacuum pump.]

Reported emission values for S compounds shall include both oxidised and reduced S emissions (SO_2 and TRS – measured as S). The S emissions related to the heat energy generation from oil, coal and other external fuels with known S content may be calculated instead of measured, and shall be taken into account.

Criterion 1.4: Emissions of CO_2 from production

CO_2 emissions from the production of fluff pulp shall not exceed 450 kg per tonne of pulp produced, including emissions from the production of electricity (whether on-site or off-site). For mechanical fluff pulp (CTMP) the limit value for emissions of CO_2 shall be 900 kg CO_2/ADt. Reference emission values according to Table 2 shall be used in the calculation of CO_2 emission from fuels. If needed, CO_2 emission factors for other fuels can be found in Annex VI to Regulation (EU) 2018/2066.

Table 2. Reference values for CO_2 emissions from different energy sources

Fuel	CO_2 fossil emissions	Unit	Reference
Coal	94.6	g CO_2 fossil/MJ	Regulation (EU) 2018/2066
Crude oil	73.3	g CO_2 fossil/MJ	Regulation (EU) 2018/2066

Fuel oil 1	74.1	g CO_2 fossil/MJ	Regulation (EU) 2018/2066
Fuel oil 2-5	77.4	g CO_2 fossil/MJ	Regulation (EU) 2018/2066
LPG	63.1	g CO_2 fossil/MJ	Regulation (EU) 2018/2066
Natural Gas	56.1	g CO_2 fossil/MJ	Regulation (EU) 2018/2066
Grid Electricity	376	g CO_2 fossil/kWh	Regulation (EU) 2019/331

***Assessment and verification**:*

The applicant shall provide data and detailed calculations showing compliance with this criterion, together with related supporting documentation.

For each pulp used, the pulp manufacturer shall provide the applicant with a single CO_2 emission value in kg CO_2/ADt. The applicant shall also provide a single CO_2 emission value for the relevant paper machinery(ies) used to produce fluff pulp.

The CO_2 emission data shall include all sources of non-renewable fuels used during the production of pulp, including the emissions from the production of electricity (whether on-site or off-site).

Factors accepted by the authorities in European Union Emissions Trading System (EU ETS) shall also be accepted. The period for the calculations or mass balances shall be based on the production over 12 months. In case of a new or a rebuilt production plant, the calculations shall be based on at least 45 subsequent days of stable running of the plant. The calculations shall be representative of the respective campaign.

For grid electricity, the value provided above (the European average) shall be used unless the applicant presents documentation establishing that energy from renewable sources is purchased, in which case the applicant may use the factor for the purchased electricity (contract for specified electricity or National Inventories), instead of the value quoted in Table 2. The documentation used as proof of compliance shall include technical specifications that indicate the average value (i.e. copy of a contract).

The amount of energy from renewable sources purchased and used for the production processes counts as zero CO_2 emission when calculating CO_2 emissions. Similarly, energy from nuclear plants counts as zero CO_2 emission. The applicant shall provide appropriate documentation that this kind of energy is actually used at the mill or has been externally purchased.

Criterion 2: Man-made cellulose fibres (including viscose, modal, lyocell, cupro, triacetate)

This criterion applies to man-made cellulose fibres that represents ≥ 1% w/w of the final product. *[to be added to the User Manual: Note that man-made cellulose fibres are obtained from the production of dissolving wood pulp which uses wood raw materials as resources.]*

Criterion 2.1: Sourcing of man-made cellulose fibres (including viscose, modal, lyocell, cupro, triacetate)

a) All (100%) wood raw materials used for the production of dissolving wood pulp shall be covered by valid chain of custody certificates issued by an independent third party certification scheme such as FSC, PEFC or equivalent.

Moreover, a minimum of 60 % wood raw materials used for the production of dissolving wood pulp 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 wood raw materials used for the production of dissolving wood pulp 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 3.1 for cotton (sourcing and traceability).

***Assessment and verification**:*

The applicant shall provide the competent body with a declaration of compliance supported by a valid, independently certified chain of custody certificate for all wood raw materials used for the production of dissolving wood pulp in the product or production line. FSC, PEFC or equivalent schemes shall be accepted as independent third-party certification.

In addition, the applicant shall provide audited accounting documents that demonstrate that at least 60 % of the wood raw materials used for the production of the dissolving wood pulp is defined as certified material according to valid FSC, PEFC or equivalent schemes.

If the dissolving wood pulp is used in air-laid or nonwoven, the air-laid or nonwoven supplier shall allocate credits to the air- laid or nonwoven delivered to the product, providing invoices to support the number of credits allocated.

If the product or production line includes uncertified virgin material, proof shall be provided that the content of uncertified virgin material does not exceed 40 % and is covered by a verification system that ensures that it is legally sourced and meets any other requirement of the certification scheme with respect to uncertified material.

In case the certification scheme does not specifically require that all virgin material is sourced from non-GMO species, additional evidence shall be provided to demonstrate this.

Criterion 2.2: Bleaching of man-made cellulose fibres (including viscose, modal, lyocell, cupro, triacetate)

This sub-criterion does not apply to TCF (total chlorine free) bleached pulp.

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 the following:

— 0,140 kg/ADT, measured in the wastewater from pulp manufacturing (AOX); and

— 150 ppm, measured in the finished fibres (OCl).

***Assessment and verification**:*

The applicant shall provide a declaration from the pulp supplier that chlorine gas is not used and a test report showing compliance with both the AOX or the OCl requirements, using the appropriate test method:

— *ISO 9562 or the equivalent EPA 1650C for AOX,*

— *ISO 11480 for OCl.*

Frequency of measurement for AOX shall be set in accordance with the criterion 1.2 for fluff pulp.

In case the applicant does not use any ECF (elemental chlorine free) pulp, a corresponding declaration to the competent body is sufficient.

Criterion 2.3: Production of man-made cellulose fibres (including viscose, modal, lyocell, cupro, triacetate)

(a) More than 50 % of pulp used to manufacture man-made cellulose 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 several compounds to air and water shall be respected in the viscose and in the modal fibres production process:

Table 3. Viscose and modal fibres emission values

Fibre type	**Sulphur emissions to air — Limit value (g/kg)**	**Zinc emissions to water — Limit value (g/kg)**	**COD emissions to water — Limit value (g/kg)**	**CS_2 emissions to air — Limit value (mg/L)**
Staple fibre	20	0,16	20	0,3
Filament fibre		0,3		
— Batch washing	40			
— Integrated washing	170			

Note: Limit values expressed as annual average.

***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.

(c) Sulphur emissions to air: 2-hour composite sample and method EN 14791 or EPA no 8 or EPA no 15A, 16A, 16B or DIN 38405-D27.

(d) Zinc emissions to water: use method defined in EN ISO 11885.

(e) COD emissions to water: use method defined in ISO 6060 or DIN ISO 15705 or DIN 38409-01 or DIN 38409-44.

(f) CS2 (sulphide) emissions to water: use method defined in DIN 38405-27 or ISO 10530.

Test methods whose scope and requirement standards is considered equivalent to the one of the named national and international standards and whose equivalency have been confirmed by an independent third party shall be accepted.

Criterion 3: Cotton and other natural cellulosic seed fibres

Criterion 3.1: Sourcing and traceability of cotton and other natural cellulosic seed fibres

This criterion applies to cotton that represents ≥ 1% w/w of the final product.

(a) All 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 3.1(a) and used to manufacture absorbent hygiene product shall be traceable.

Tampon strings are exempted from complying with this requirement.

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[4], 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 that document the quantity of cotton purchased on an annual basis from farmers or producer groups, and the total weight of certified bales shall be provided.

Criterion 3.2: Bleaching of cotton and other natural cellulosic seed fibres

Cotton shall not be bleached with the use of elemental chlorine gas (Cl_2).

Assessment and verification:

The applicant shall provide a declaration from the supplier that elemental chlorine gas is not used.

Criterion 4: Synthetic polymers and plastic materials

Criterion 4.1: Production of synthetic polymers and plastic materials

[4] *Council Regulation (EC) No 834/2007 of 28 June 2007 on organic production and labelling of organic products and repealing Regulation (EEC) No 2092/91*

All plants producing synthetic polymers and plastic materials used in the final product shall have systems for the implementation of:

— water-saving (e.g. monitoring of water flow in a facility and circulating the water in closed systems),

— integrated waste management plan to optimise prevention, reuse, recycling, recovery and final disposal of waste (e.g. separation of different waste fractions),

— optimisation of energy efficiency and energy management (e.g. reuse of the steam generated during the manufacture of SAPs).

Assessment and verification:

The applicant shall provide a declaration of compliance with the cited requirement from the suppliers of synthetic polymers and plastic materials. 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 in accordance with standards, such as ISO 14001 and/or ISO 50001.

Criterion 4.2: Bio-based plastic materials

This criterion applies to final absorbent hygiene products where synthetic polymers and plastic materials represents ≥ 1% w/w (not counting packaging).

A minimum of XX % w/w of the total synthetic polymers and plastic materials in relation to the total weight of polymers in the final absorbent hygiene product (including SAP) must be sourced from bio-based raw materials (not counting packaging).

All (100%) bio-based raw materials used for the production of bio-based plastic in absorbent hygiene products shall be covered by valid chain of custody certificates issued by an independent third party certification scheme such as International Sustainability and Carbon Certification (ISCC), Roundtable on Sustainable Biomaterials (RSB), Roundtable Responsible Soy (RTRS), Roundtable on Sustainable Palm Oil (RSPO), Forest Stewardship Council (FSC), Programme for the Endorsement of Forest Certification Schemes (PEFC), Öko-Landbau-Siegel, Rainforest Alliance (SAN), Bonsucro, REDcert, OCS 100 - Organic Content Standard, TUV Austria, BioPreferred Program or equivalent.

Assessment and verification:

The applicant shall provide the competent body with a declaration of compliance supported by a valid, independently certified chain of custody certificate from the manufacturer of EU Ecolabel absorbent hygiene product and for all bio-based plastics used in the product or production line to produce.

The standard CEN/TS 16137 shall be used to determine the bio-based carbon content of the synthetic polymers and plastic materials present in the product.

International Sustainability and Carbon Certification (ISCC), Roundtable on Sustainable Biomaterials (RSB), Roundtable Responsible Soy (RTRS), Roundtable on Sustainable Palm Oil (RSPO), Forest Stewardship Council (FSC), Programme for the Endorsement of Forest Certification Schemes (PEFC), Öko-Landbau-Siegel, Rainforest Alliance (SAN), Bonsucro, REDcert, OCS 100 - Organic Content Standard, TUV Austria, BioPreferred Program or equivalent schemes shall be accepted as independent third-party certification.

The use of purchased certificates based on the Book & Claim system is excluded so that the traceability of the raw materials is possible. The proofs of purchase for the raw materials

must be based on processes according to the segregation or mass balance systems. In addition, the applicant shall provide audited accounting documents that demonstrate that 100 % of the bio-based raw materials used for the production of the bio-based plastic is defined as certified material according to the valid cited schemes.

In case the certification scheme does not specifically require that all virgin material is sourced from non-GMO species, additional evidence shall be provided to demonstrate this.

Criterion 5: Biodegradability of the product (including packaging)

If the absorbent hygiene product (including packaging) contains a certain percentage of biodegradable and/or compostable materials, the biodegradability and/or compostability of that material must be certified by the supplier of that material.

A clear statement shall be given on the primary packaging to guide consumers on how to dispose correctly the cited absorbent hygiene product containing biodegradable and/or compostable material, after use. Guidance shall also apply to packaging if it is biodegradable and/or compostable.

Assessment and verification:

The applicant shall provide a declaration of compliance with this criterion specifying the biodegradable and/or compostable section of the absorbent hygiene product (including packaging). The declaration shall be supported by a test report performed using one of the test methods mentioned below.

Biodegradability and/or compostability must be certified by complying with the EN 14995, ISO 14855, ISO 15985 or ISO 16929.

Equivalent methods may be accepted as test methods if considered equivalent by a third-party, and must be accompanied by detailed explanations showing compliance with this requirement and related supporting documentation.

Moreover, the applicant shall submit a high resolution image of the primary packaging (where information on how to dispose the product correctly appear clearly).

Criterion 6: Material efficiency in the manufacturing

Requirements in this criterion shall apply to the final absorbent hygiene product assembly site.

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:

— 8 % by weight of the end products for tampons,

— 4 % by weight of the end products for all the other products.

Assessment and verification:

The applicant shall confirm compliance with the above requirements.

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: Excluded and restricted substances

Criterion 7.1: Restrictions on substances classified under Regulation (EC) No 1272/2008 of the European Parliament and of the Council[5]

Unless derogated in Table 5, the final product, and any component articles therein, shall not contain ingoing substances (alone or in mixtures) that are assigned any of the hazard classes, categories and associated hazard statement codes stated in Table 4, in accordance with Regulation (EC) No 1272/2008.

Table 4. Excluded hazard classes, categories and associated hazard statement codes

Carcinogenic, mutagenic or toxic for reproduction	
Categories 1A and 1B	Category 2
H340 May cause genetic defects	H341 Suspected of causing genetic defects
H350 May cause cancer	H351 Suspected of causing cancer
H350i May cause cancer by inhalation	-
H360F May damage fertility	H361f Suspected of damaging fertility
H360D May damage the unborn child	H361d Suspected of damaging the unborn child
H360FD May damage fertility. May damage the unborn child	H361fd Suspected of damaging fertility. Suspected of damaging the unborn child
H360Fd May damage fertility. Suspected of damaging the unborn child	H362 May cause harm to breast fed children
H360Df May damage the unborn child. Suspected of damaging fertility	

Acute toxicity	
Categories 1 and 2	Category 3
H300 Fatal if swallowed	H301 Toxic if swallowed
H310 Fatal in contact with skin	H311 Toxic in contact with skin
H330 Fatal if inhaled	H331 Toxic if inhaled
H304 May be fatal if swallowed and enters airways	EUH070 Toxic by eye contact

Specific target on organ toxicity	
Category 1	Category 2
H370 Causes damage to organs	H371 May cause damage to organs
H372 Causes damage to organs through prolonged or	H373 May cause damage to organs through

[5] *Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006 (OJ L 353, 31.12.2008, p. 1)*

repeated exposure	prolonged or repeated exposure
Respiratory and skin sensitisation	
Category 1A	Category 1B
H317 May cause allergic skin reaction	H317 May cause allergic skin reaction
H334 May cause allergy or asthma symptoms or breathing difficulties if inhaled	H334 May cause allergy or asthma symptoms or breathing difficulties if inhaled

Table 5. Derogations to restrictions on substances with a harmonised classification under Regulation (EC) No 1272/2008 and applicable conditions

Substance type	**Applicability**	**Derogated hazard class, category and hazard statement code**	**Derogation conditions**
Titanium dioxide (nano-form)	Pigment	H351: Suspected of causing cancer	It cannot be used in powder or spray form

Moreover the final product, and any component articles therein, shall not contain ingoing substances (alone or in mixtures) in concentrations greater than 0,010% (weight by weight) that are assigned any of the hazard classes, categories and associated hazard statement codes stated in Table 6, in accordance with Regulation (EC) No 1272/2008.

Table 6. Restricted hazard classes, categories and associated hazard statement codes

Hazardous to the aquatic environment	
Categories 1 and 2	Category 3 and 4
H400 Very toxic to aquatic life	H412 Harmful to aquatic life with long-lasting effects
H410 Very toxic to aquatic life with long-lasting effects	H413 May cause long-lasting effects to aquatic life
H411 Toxic to aquatic life with long-lasting effects	
Hazardous to the ozone layer	
H420 Harms public health and the environment by destroying ozone in the upper atmosphere	

The hazard statement codes generally refer to substances. However, if information on substances cannot be obtained, the classification rules for mixtures shall apply.

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.

This criterion does not apply to:

— substances not included in the scope of Regulation (EC) No 1907/200618 as defined in Article 2(2) of that Regulation;

— substances covered by Article 2(7)(b) of Regulation (EC) No 1907/2006, which sets out the criteria for exempting substances included in Annex V to that Regulation from the registration, downstream user and evaluation requirements.

In order to determine if this exclusion applies, the applicant shall screen any ingoing substances or mixtures present in the product.

***Assessment and verification**:*

The applicant shall provide a signed declaration of compliance with sub-criterion 7.1, together with a list of all chemicals used in their production process, their safety data sheet or chemical supplier declaration and any relevant declarations that demonstrate the compliance with the requirement.

For restricted substances and unavoidable impurities with a restricted classification, the concentration of the restricted substance or impurity and an assumed retention factor of 100%, shall be used to estimate the quantity of the restricted substance or impurity remaining in the final product. [to be added in the User Manual: impurities can be present in the final product up to 0.0100% w/w. Substances known to be released or to degrade from ingoing substances are considered ingoing substances and not impurities]

Justifications for any deviation from a retention factor of 100% (e.g. solvent evaporation) or for chemical modification of a restricted impurity must be provided.

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 impurity 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).

The above evidence can also be provided directly to competent bodies by any supplier in the applicant's supply chain.

Criterion 7.2: Substances of Very High Concern (SVHCs)

The final product, and any component articles therein, shall not contain ingoing substances (alone or in mixtures) that meet the criteria referred to in Article 57 of Regulation (EC) No 1907/2006 of the European Parliament and of the Council[6] 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 authorisation.

Assessment and verification:

The applicant shall provide a signed declaration that the final product does not contain any SVHCs. The declaration shall be supported by safety data sheets of all supplied chemicals and materials used to produce the final product.

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.

For unavoidable impurities identified as SVHCs, the concentration of the impurity and an assumed retention factor of 100%, shall be used to estimate the quantity of the SVHC impurity remaining in the final product. [to be added in the User Manual: impurities can be

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[6] *Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), establishing a European Chemicals Agency, amending Directive 1999/45/EC and repealing Council Regulation (EEC) No 793/93 and Commission Regulation (EC) No 1488/94 as well as Council Directive 76/769/EEC and Commission Directives 91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC (OJ L 396, 30.12.2006, p. 1)*

present in the final product up to 0.0100% w/w. Substances known to be released or to degrade from ingoing substances are considered ingoing substances and not impurities]

Justifications for any deviation from a retention factor of 100% (e.g. solvent evaporation) or for chemical modification of a SVHC impurity must be provided.

Criterion 7.3: Other specific restrictions

Criterion 7.3(a): Specified excluded substances

The following substances shall not be included (alone or in mixtures) in the final product, nor in any component articles therein:

i. 5-chloro-2-methyl-4-isothiazoline-3-one (CMIT);
ii. Acrylamide;
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;
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.

Criterion 7.3(b): Fragrances

(i) Fragrances shall not be added to the final product, nor to any component thereof, nor to the packaging.

(ii) Odour control substances may be permitted only in adult incontinence products. In this case, the odour control substances:

- shall be encapsulated in, or bound/attached to the absorbent core of the adult incontinence product;
- shall not exceed 1.5% w/w of the mass of the absorbent core;
- shall moreover be indicated on the product packaging.

Criterion 7.3(c): Lotions

Lotions shall not be used in the product, nor in any component thereof.

Criterion 7.3(d): Inks and dyes

This requirement does not apply to the primary packaging and information sheets.

(i) The final product and any component part thereof shall not be dyed.

(ii) The following components are exempted and may be dyed:

— tampon strings, packaging materials and closing system;

— materials that are not directly in contact with the skin, 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).

In these cases, the dying colorants and inks used shall have been approved as food additives in accordance with Regulation (EC) No 1333/2008.

In addition, the content of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, primary aromatic amines and polychlorinated biphenyl occurring as impurity in the dying colorants and inks shall be below the limits given in the European Council's Resolution AP (89) 1 on the use of colorants in plastic materials coming into contact with food[7].

The dying colorants and inks used shall also comply with sub-criteria 7.1 and 7.2.

Criterion 7.3(e): Further restrictions applying to synthetic polymers and plastic materials

(i) 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.

(ii) 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).

Criterion 7.3(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:

[7] *Council of Europe, Committee of Ministers, Resolution AP(89)1 on the use of colorants in plastic materials coming into contact with food. Available at: https://rm.coe.int/16804f8648*

— Colophony: Adhesives shall not contain more than 0.01% (weight by weight) colophony. 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 7.3(g): Super absorbent polymers (SAP)

(i) Superabsorbent polymers used in the product shall contain a maximum of 1 000 ppm residual monomers [4] that are classified with the H-codes reported in sub-criterion 5.1. For sodium polyacrylate this limit applies to the sum of unreacted acrylic acid and cross linking agents.

(ii) Superabsorbent polymers used in the product shall, as a maximum, contain 10 % (weight/weight) of water-soluble extracts [5] and these shall comply with sub-criteria 5.1, 5.2 and 5.3.(a). For sodium polyacrilate these represent monomers and oligomers of acrylic acid with lower molecular weight than the superabsorbent polymer according to ISO 17190.

Criterion 7.3(h): Silicone

(i) Solvent-based silicone coatings shall not be used.

(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 [6] in concentrations above 800 ppm (0,08 % w/w). The 800 ppm limit is to be applied to each substance separately.

Criterion 7.3(i): Impurities of concern

The following chemicals shall not be present in the final product in a concentration higher than what indicated in Table 7.

Table 7. List of restricted chemicals

<table>
<tr><th>Substances</th><th>Restrictions</th></tr>
<tr><td>Formaldehyde</td><td>< 16 ppm</td></tr>
<tr><td>Dibenzo-p-dioxins (PCDDs): 2,3,7,8-TCDD; 1,2,3,7,8-PeCDD; 1,2,3,4,7,8-HxCDD; 1,2,3,6,7,8-HxCDD; 1,2,3,7,8,9-HxCDD; 1,2,3,4,6,7,8-HpCDD; OCDD</td><td rowspan="3">sum TEQ of the detected congeners of PCDDs, PCDFs and DLPCBs < 2ng/kg</td></tr>
<tr><td>Dibenzofurans (PCDFs): 2,3,7,8-TCDF; 1,2,3,7,8-PeCDF; 2,3,4,7,8- PeCDF; 1,2,3,4,7,8-HxCDF; 1,2,3,6,7,8-HxCDF; 1,2,3,7,8,9-HxCDF; 2,3,4,6,7,8-HxCDF; 1,2,3,4,6,7,8-HpCDF; 1,2,3,4,7,8,9-HpCDF; OCDF</td></tr>
<tr><td>DLPCBs: PCB 77; PCB 81; PCB 126; PCB 169; PCB 105; PCB 114; PCB 118; PCB 123; PCB 156; PCB 157; PCB 167; PCB 189; Hexachlorobenzene</td></tr>
<tr><td colspan="2">PAHs</td></tr>
</table>

Benzo(a)anthracene; Benzo(a)pyrene; Benzo(e)pyrene; Chrysene; Benzo(b)fluoranthene; Benzo(k)fluoranthene; Dibenzo(a,h)anthracene; Benzo(j)fluoranthene; Benzo(g,h,i)perylene; Indeno(1,2,3,cd)pyrene; Phenanthrene; Pyrene; Anthracene; Fluoranthene; Naphthalene	Each PAH < 0.2 mg/kg Sum PAHs < 1 mg/kg
Phenols	
Bisphenol A	< 0.02 %
Nonylphenol-di-ethoxylate	< 10 mg/kg
Nonylphenol	< 10 mg/kg
Pesticides	
Glyphosate	< 0.5 mg/kg
AMPA	< 0.5 mg/kg
Quintozene	< 0.5 mg/kg
Organotins	
Tributyltin	< 2 ppb
Other organotins: Monobutyltin; Dibutyltin; Triphenyltin; Dioctyltin; Monooctylti	Each organotin < 10ppb
Heavy metals	
Antimony	< 30 mg/kg
Cadmium	< 0.1 mg/kg
Chromium	< 1 mg/kg
Lead	< 0.2 mg/kg
Mercury	< 0.02 mg/kg

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:

To demonstrate compliance with sub-criteria 7.3(a), 7.3(e), 7.3(f) and 7.3(g), the applicant shall provide:

(i) safety data sheets (SDS) of any substance/mixture and their concentration in the final product;

(ii) a written confirmation that sub-criteria 7.3(a), 7.3(e), 7.3(f) and 7.3(g) are fulfilled.

To demonstrate compliance with sub-criterion 7.3(b), the list of odour control substances used and visual evidence that information has been added to the packaging shall be provided, when odour control substances are used.

To demonstrate compliance with criterion 7.3(d), in case dyes are used, their presence shall be justified by indicating the specific function provided, and documentation shall be provided to ensure that the colouring agent is approved for use in food.

To demonstrate compliance with sub-criterion 7.3(f), the applicant shall also provide test results for formaldehyde, according to the test method ISO 14184-1:2011 or equivalent.

To demonstrate compliance with sub-criterion 7.3(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 declaration shall be supported by SDSs or test results specifying the residual monomers contained in the SAP and the quantities thereof. If tests are used, recommended test methods are ISO 17190 and WSP 210. In these cases, the tested quantities for residual monomers and soluble extracts shall be averages from repeated measures over a certain period of time. The methods used and the measurement frequency for the analyses shall be described, including the information of the laboratories used for the analysis.

To demonstrate compliance with sub-criterion 7.3(h), the applicant shall provide a declaration from the silicone supplier that requirement (ii) has been fulfilled.

To demonstrate compliance with sub-criterion 7.3(i), the applicant shall provide a declaration of compliance, together with the results of the analyses performed on the final product. Alternatively, the analyses can be performed separately on each of the material composing the final product. The methods used and the measurement frequency for the analyses shall be described, including the information of the laboratories used for the analysis.

The above evidence may also be provided directly to competent bodies by any supplier in the applicant's product supply chain.

Notes:

[1] Substance name = "Alkyl phenol", under: https://echa.europa.eu/es/advanced-search-for-chemicals

[2] This exclusion relates to the use of formaldehyde and formaldehyde releasers in lotions. Their use in adhesives is regulated according to Criterion 5.3 (f)

[3] DIBP and DINP may be allowed if used in adhesive formulations at a maximum concentration of 0.010% weight by weight of the adhesive formulation

[4] Residual monomers are intended as the total of unreacted acrylic acid and crosslinkers.

[5] Water-soluble extracts in SAP are intended as monomers and oligomers of acrylic acid with a lower molecular weight than the one of SAP, and salts.

[6] Silicone mixture is intended here as the liquid mixture composed of two or more silicone raw materials that is used as a coating on the protective paper or the protective film used for the release liner on some feminine hygiene products (e.g. panty liners and sanitary towels) or on nappy tapes.

(*) References:

Council of Europe, Committee of Ministers, Resolution AP(89)1 on the use of colorants in plastic materials coming into contact with food. Available at: https://rm.coe.int/16804f8648]

Criterion 8: Packaging

This criterion applies to primary and secondary packaging, as defined in European Parliament and Council Directive 94/62/EC[8].

[8] *European Parliament and Council Directive 94/62/EC of 20 December 1994 on packaging and packaging waste (OJ L 365, 31.12.1994, p. 10).*

(a) Cardboard and paper used for packaging

Cardboard and paper used for the primary and secondary packaging of absorbent hygiene products shall be made of 100 % recycled material in the case that additional component (being individual wrapping of the product) is present in the product. If there is not additional component (individual wrapping of the product), only the secondary packaging made of cardboard/paper shall be made of 100% recycled material.

Cardboard and paper used for the primary and secondary packaging shall be designed for recycling in at least 95%.

(b) Plastic used for packaging

Plastic used for the primary and secondary packaging of absorbent hygiene products shall be made of at least 80 % recycled material in the case that additional component (being individual wrapping of the product) is present in the product. If there is not additional component (individual wrapping of the product), only the secondary packaging made of plastic shall be made of 80% recycled material.

Plastic used for the primary and secondary packaging shall be designed for recycling in at least 95%.

Only unmixed plastic without any coating is permitted when using plastic packaging.

If primary or secondary packaging is sourced from bio-based plastic, sub-criterion 4.2 shall apply.

(c) Additional requirement

Utilisation of composite packaging (primary or secondary) or the coating of the cardboard/paper with plastics or metals are not allowed.

Assessment and verification:

The applicant shall submit (1) a signed declaration of compliance specifying the percentages of recycled content of the primary and secondary packaging; (2) a declaration of compliance specifying the recyclability capacity of the primary and secondary packaging and (3) a high resolution image of the primary packaging (where information regarding recyclable content and recyclability appear clearly).

Recycled content must be verified by complying with the EN 45557 or ISO 14021 while recyclability must be verified by complying with the EN 13430 or ISO 18604.

Equivalent methods may be accepted as test methods if considered equivalent by a third-party, and must be accompanied by detailed explanations showing compliance with this requirement and related supporting documentation. Invoices demonstrating the purchase of the recycled material must be provided.

Criterion 9: Guidance on the disposal of the product and of the packaging

The primary packaging must contain guidance regarding disposal of the primary packaging, the secondary packaging (if any), the additional components and the product. The following information shall be written or indicated through visual symbols on the primary packaging:

- that the primary packaging, the secondary packaging (if any), the additional component and the hygiene used product must not be flushed into toilets, and
- how to dispose the primary packaging, the secondary packaging (if any), the additional components and the hygiene used product correctly.

***Assessment and verification**:*

The applicant shall provide a high resolution image of the primary packaging (where information regarding disposal appear clearly).

Criterion 10: Fitness for use and quality of the product

The efficiency/quality of the product shall be at least as satisfactory as an equivalent product already on the market. Fitness-for-use shall be tested with respect to the characteristics and parameters reported in Table 8. Performance thresh- olds shall be matched, where these have been identified.

Table 8. 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 ([1])	Consumer panel test (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

([1]) Panty liners intended to protect the feminine lingerie (light panty liners) are derogated from this requirement.

***Assessment and verification**:*

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.

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.

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.

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 (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.*

— *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 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).*

— *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.*

— *Technical tests recommended for nursing pads are the same as for baby diapers and for feminine care pads.*

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

Criterion 11: Corporate Social Responsibility with regard to Labour Aspects

Requirements in this criterion shall apply to the final absorbent hygiene product assembly site.

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.

Fundamental conventions of the ILO:

(i) Child Labour:

— Minimum Age Convention, 1973 (No 138);

— Worst Forms of Child Labour Convention, 1999 (No 182).

(ii) Forced and Compulsory Labour:

— Forced Labour Convention, 1930 (No 29) and 2014 Protocol to the Forced Labour Convention;

— Abolition of Forced Labour Convention, 1957 (No 105).

(iii) Freedom of Association and Right to Collective Bargaining:

— Freedom of Association and Protection of the Right to Organise Convention, 1948 (No 87);

— Right to Organise and Collective Bargaining Convention, 1949 (No 98).

(iv) Discrimination:

— Equal Remuneration Convention, 1951 (No 100);

— Discrimination (Employment and Occupation) Convention, 1958 (No 111).

Supplementary provisions:

(v) Working Hours:

— ILO Hours of Work (Industry) Convention, 1919 (No 1).

(vi) Remuneration:

— ILO Minimum Wage Fixing Convention, 1970 (No 131);

— 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'.

(vii) Health & Safety:

— ILO Safety in the use of chemicals at work Convention, 1981 (No 170);

— ILO Occupational Safety and Health Convention, 1990 (No 155).

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.

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.

These standards shall be communicated to production sites along the supply chain used to manufacture the final product.

Assessment and verification:

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.

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 ([1]) and where the scope of the inspection systems covers the areas listed above, by labour inspector(s) appointed by a national authority.

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.

(References:*

ILO NORMLEX (http://www.ilo.org/dyn/normlex/en) and supporting guidance.

United Nations Global Compact (Pillar 2) https://www.unglobalcompact.org/what-is-gc/participants/141550

Guiding Principles for Business and Human Rights https://www.unglobalcompact.org/library/2

OECD Guidelines for Multinational Enterprises https://www.oecd.org/daf/inv/mne/48004323.pdf)

Criterion 12: Information appearing on the EU Ecolabel

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

— ‘Product designed to reduce environmental impact’,

— ‘Restricted use of hazardous substances’,

— ‘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 primary packaging that clearly shows the label, the registration/licence number and, where relevant, the statements that can be displayed together with the label.