EU Ecolabel criteria for ABSORBENT HYGIENE PRODUCTS
7 June 2022

THE MEETING WILL START AT 9:00 AND WILL BE RECORDED

ETIQUETTE FOR WEB-PARTICIPANTS

- Please indicate “NAME OF YOUR ORGANIZATION + YOUR FULL NAME”
- MUTE YOUR MIC (unless you have the floor) AND SWITCH OFF you CAMERA
- USE THE CHAT either to request the floor and/or to make a concise written comment

EU Ecolabel criteria for Absorbent Hygiene Products

2nd Ad-hoc Working Group Meeting

Giorgia Faraca
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Alfonso Lag Brotons
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7th June 2022 (Webex)

Morning session: 08:45-13:00

Opening of virtual room and welcome of participants	**08:45 – 09:00**
Introduction and timeline	**09:00 – 09:10**
Revised scope and definitions **Update on the LCA screening study on AHPs**	**09:10 – 9:30**
Criterion 1: Fluff pulp & Criterion 2: Man-made cellulose fibres	**9:30 – 11:00**
15 min break	
Criterion 3: Cotton and other natural cellulosic seed fibres & **Criterion 4: Synthetic polymers and plastic materials**	**11:15 – 11:45**
Criterion 5: Biodegradability **Criterion 6: Material efficiency in the manufacturing**	**11:45 - 12:15**
Criterion 7: Excluded and restricted substances	**12:15 - 13:00**
Lunch break	**13:00-14:00**

Afternoon session: 14:00-17:00

Lunch break	**13:00-14:00**
Criterion 7: Excluded and restricted substances (continued)	**14:00 – 15:00**
Criterion 8: Packaging	**15:00 – 15:30**
15 min break	
Criterion 9: Guidance on the disposal of the product and of the packaging **Criterion 10: Fitness for use and quality of the product** **Criterion 11: Social Responsibility with regard to Labour Aspects** **Criterion 12: Information appearing on the EU Ecolabel**	**15:45 – 16:45**
Conclusion, next steps and closure of the meeting	**16:45 – 17:00**

JRC Mission

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

Activities in support of Product Policy

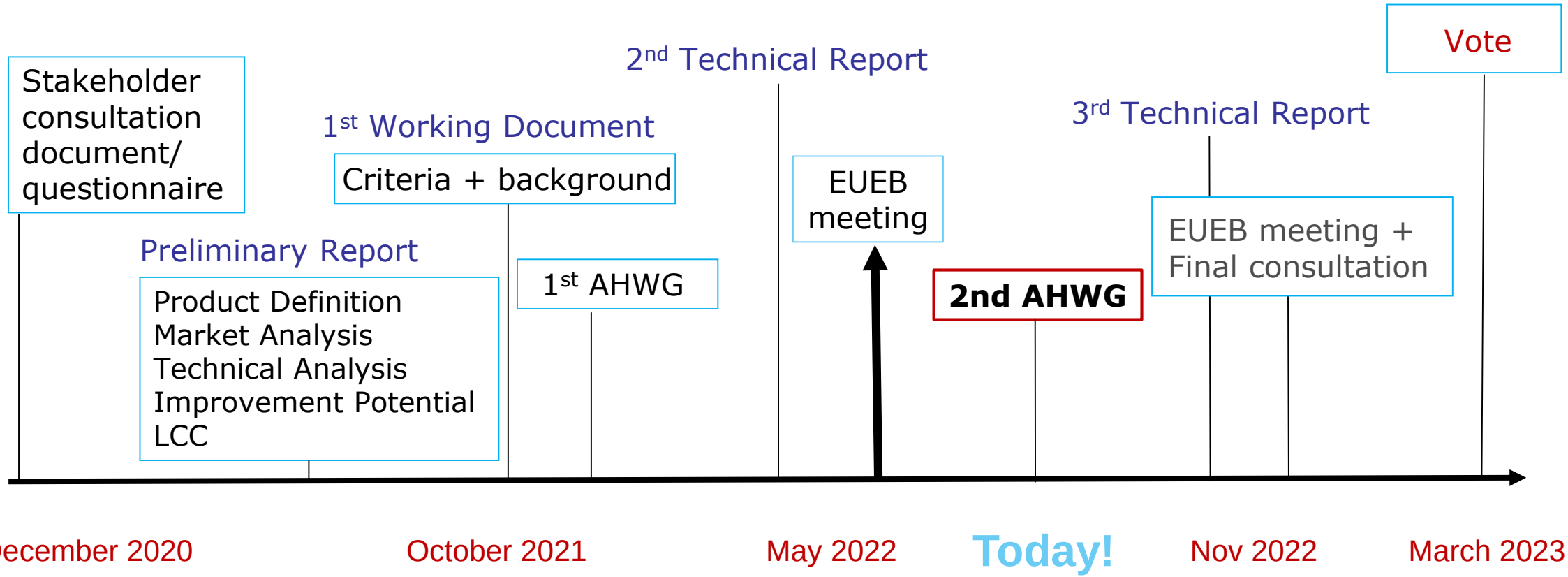
- JRC B5 Product Bureau supports the development and implementation of Sustainable Product Policies, among them the EU Ecolabel Regulation and the Green Public Procurement Communication.

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

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

Criteria revision process

Current criteria prolonged until December 2023



European Commission

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Revised scope proposal
First proposal for the scope

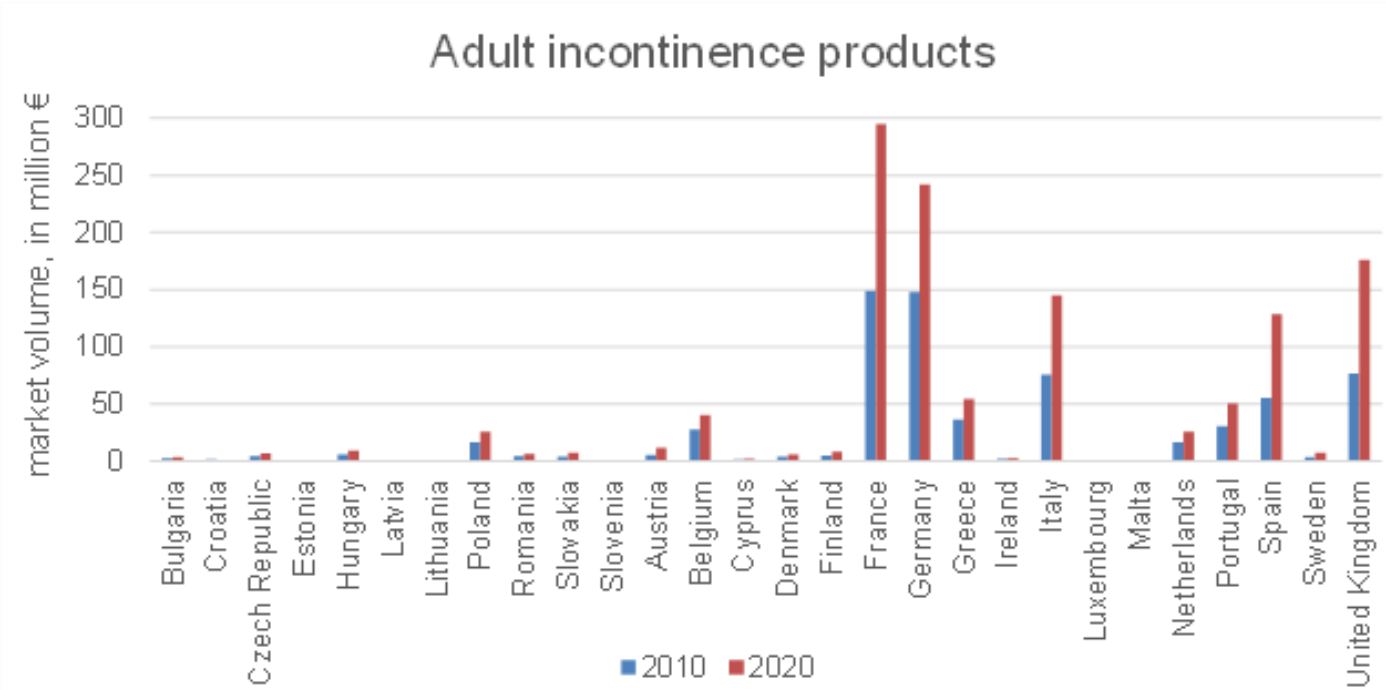
First proposal for product group name
Absorbent hygiene products and menstrual cups
First proposal for product group scope
1. The product group 'absorbent hygiene products' shall comprise any sanitary article whose function is to absorb and retain human urine, faeces, sweat, menstrual fluid and milk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

Revised scope proposal
Feedback from the 1st consultation

- Stakeholders were in general satisfied with the new wording
- However unclear as to what concerns adult incontinence products
- Some disappointment because reusable AHPs made of textiles are not included in the product group scope

Revised scope proposal
Further research – Adult incontinence products

- 82% of the stakeholders (preliminary questionnaire) were in favour of including incontinence products
- Included in the scope of Nordic Swan, Blue Angel, and the Good Environmental Choice Australia
- Normally CE marked, but not always



Revised scope proposal
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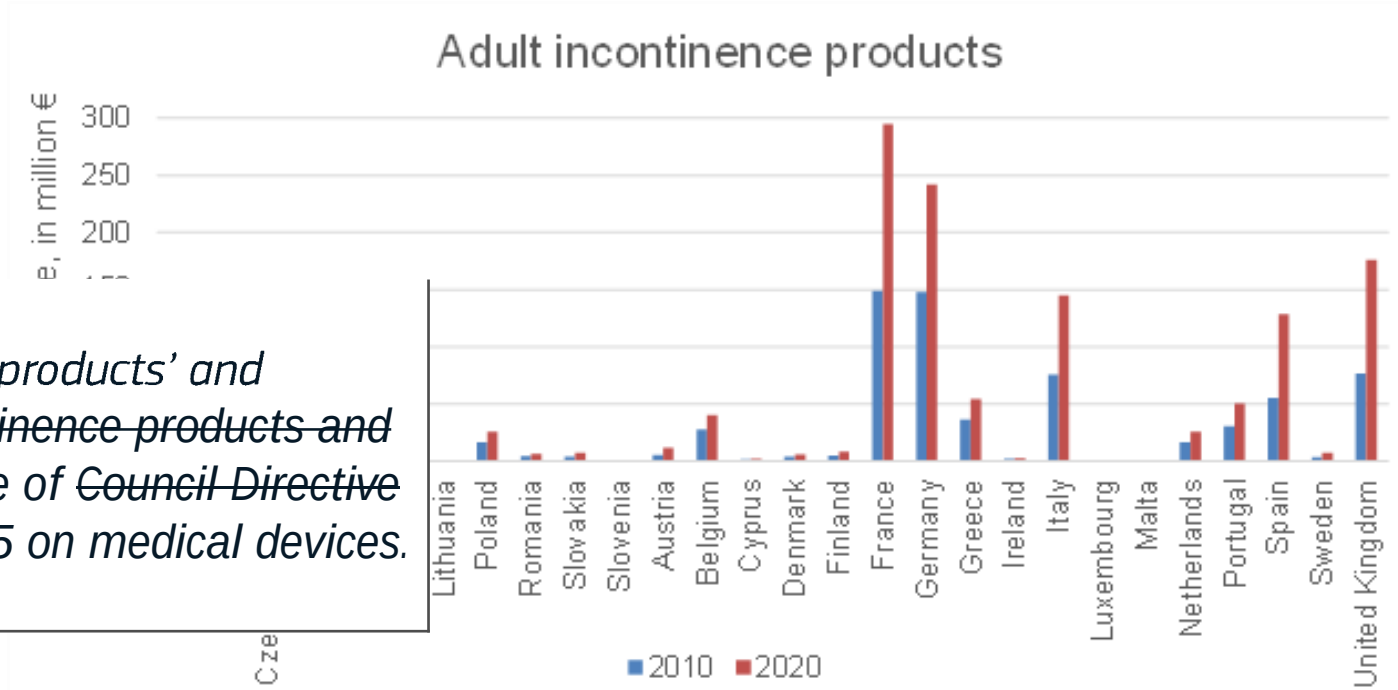
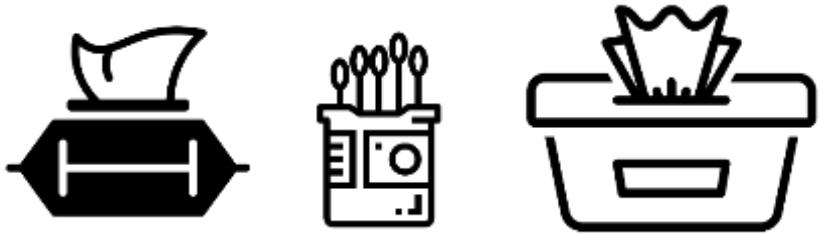


3. The product groups 'absorbent hygiene products' and 'reusable menstrual cups' shall not include ~~incontinence products and any other type of~~ products falling under the scope of ~~Council Directive 93/42/EEC amended by~~ Regulation (EU) 2017/745 on medical devices.

Revised scope proposal
Further research

- Wet wipes, cotton swabs and make up remover wipes are not included in the scope



Annex I	Annex II
Absorbent Hygiene Products	Reusable menstrual cups

Revised scope proposal
Proposed scope

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

Revised definition proposal
Proposed definitions

First proposal of product group scope and definition:
(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.
(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.

Revised definition proposal
Proposed definitions

First proposal of product group scope and definition:
(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.
(8) 'Product unit' means the smallest item that can be used by the consumer and that fulfils the product's function.
(11) 'Recycling' means, in accordance with Article 3 of Directive 2008/98/EC of the European Parliament and of the Council , 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'.

Revised A&V proposal

First proposal for assessment and verification
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 country (countries) in which the product is intended to be placed on the market. The applicant shall declare the product's compliance with this requirement.

Revised A&V proposal

Second proposal for assessment and verification
[…] 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 stating that all the criteria are fulfilled shall also be required for the assessment.

Update on the LCA screening study
Environmental analysis

Life cycle assessment

Update on the LCA screening study
Feedback from the verifiers

"The study is technically performed correctly, but little attention is paid to the influence of representativeness of the data on the conclusions"

↓

Further research from the JRC

↓

"The study is technically performed correctly. Due to the character of the study, not all PEF reporting requirements could be fully met, but this makes no difference to the results. The limitations and representativeness of the conclusions are sufficiently explained, and the study finds and discusses the environmental hotspots in a way that they can be used for the goal."

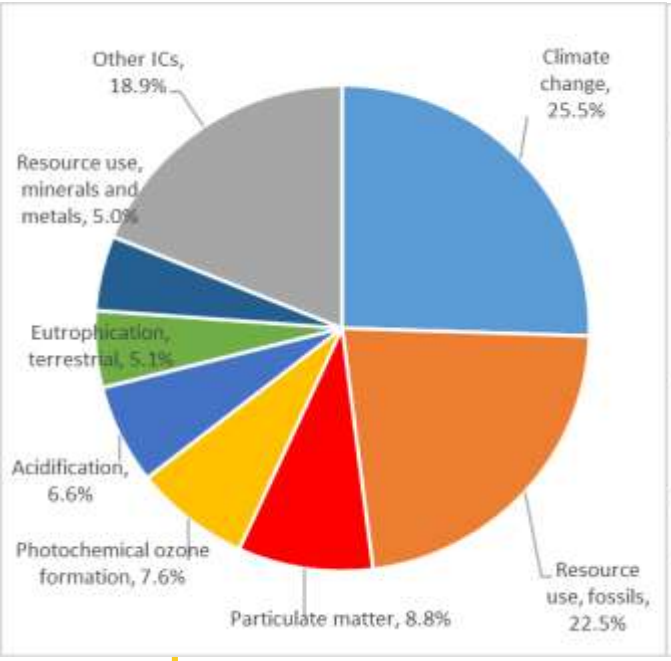
Update on the LCA screening study

One piece of an average product marketed in the European Union

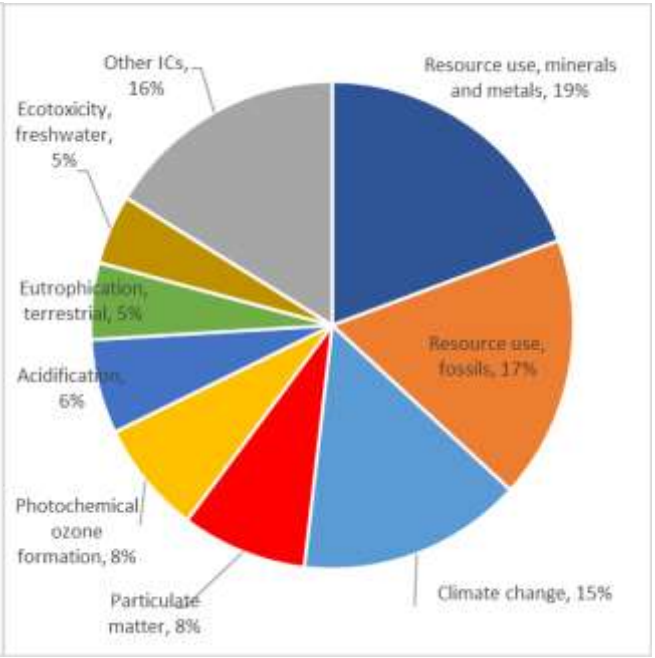
An average open baby diaper

An average sanitary towel

Open baby diaper



Sanitary towel



Environmental hotspots	
Baby diapers	***Sanitary towels***
SAP production	PET
PP	LDPE
LDPE	viscose
Fluff pulp	PP
PET	Fluff pulp
Waste landfilling	Transport

European Commission

Structure of the criteria

Proposed changes to the revised criteria - AHPs	
~~1~~	~~Product description~~ (REMOVED)
1	Fluff Pulp
2	Man-made cellulose fibres (including viscose, modal, lyocell, cupro, triacetate)
3	Cotton and other natural cellulosic seed fibres
4	Synthetic polymers and plastic materials
4.2	Bio-based plastic materials - NEW
5	Biodegradability - NEW
6	Material efficiency in the manufacturing
7	Excluded and restricted substances
7.3.h	Impurities of concern - NEW
8	Packaging
9	Guidance on the disposal of the product and of the packaging
10	Fitness for use and quality of the product
11	Corporate Social Responsibility with regard to Labour Aspects
12	Information appearing on the EU Ecolabel

Revised scope proposal
Update on the LCA screening study

Questions and comments?

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Criterion 7: Excluded and restricted substances	12:15 - 13:00
Lunch break	13:00-14:00

Criterion 1 - Product Description REMOVED

First proposal for criterion 1: Product description
A description of the product and packaging shall be provided together with information on all of the following characteristics: — the total weight of the product and packaging, — the components, materials and additives used in the product with their respective weights and, whenever applicable, their respective CAS numbers. Assessment and verification: The applicant shall provide a technical description of the product that shall include information on the weight of the product and of each component, material and additive used in the final product.

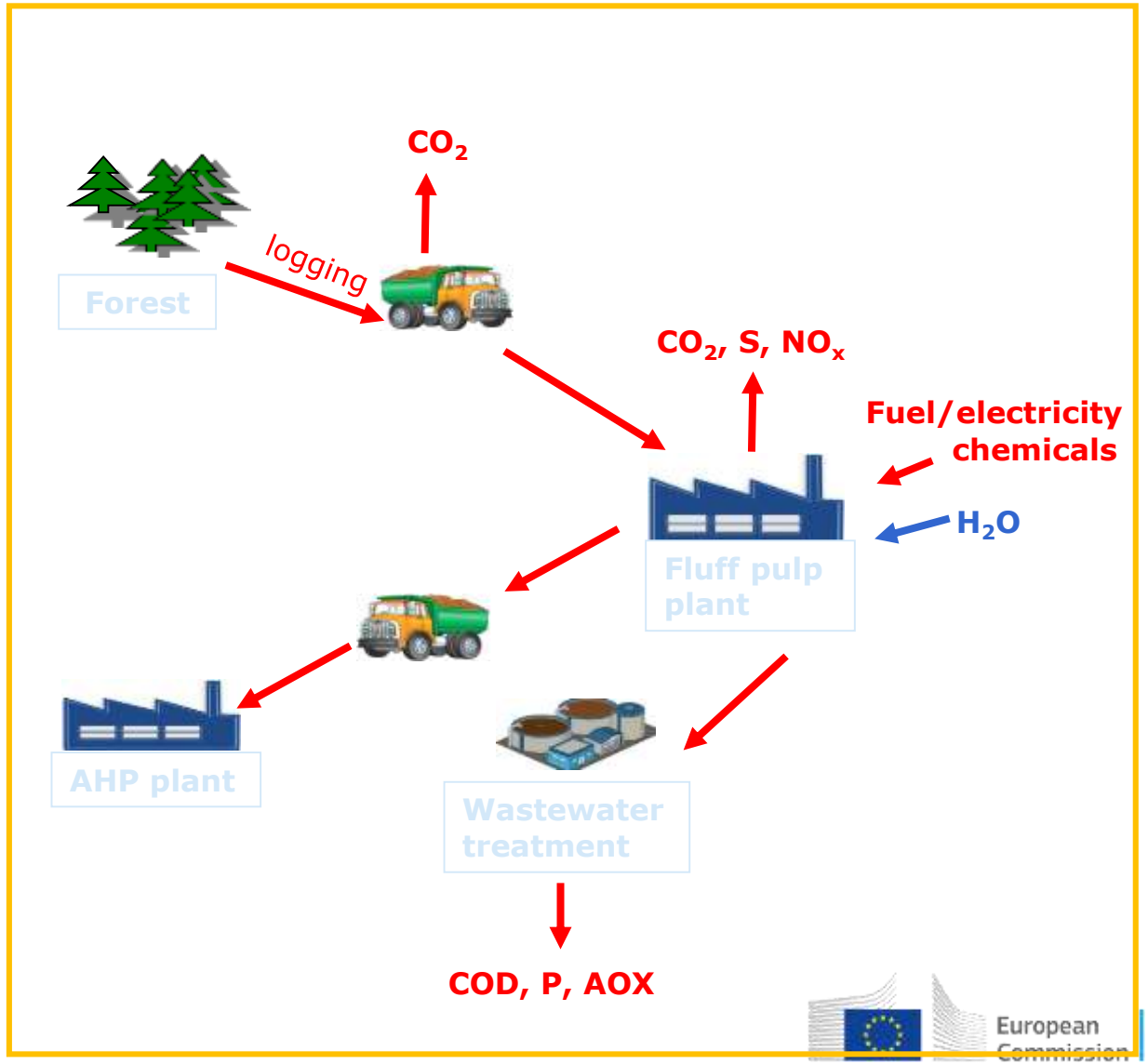
Criterion 1 - Fluff Pulp

1.1 Sourcing of fluff pulp

1.2 Bleaching of fluff pulp

1.3 Emissions of COD and P to water and of Sand NOx to air

1.4 Emissions of CO2



First proposal for sub-criterion 1.1: Sourcing of fluff pulp

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

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 graphic paper and for all virgin fibres used in the product or production line. FSC, PEFC or equivalent schemes shall be accepted as independent third-party certification.

The applicant shall provide audited accounting documents that demonstrate that at least 70 % of the materials allocated to the product or production line originate from forests or areas managed according to sustainable forestry management principles that meet the requirements set out by the relevant independent chain of custody scheme and/or originate from recycled materials.

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 1.1 – Sourcing of Fluff Pulp
Feedback from the 1st consultation

- 54 comments from stakeholders
- The analysis of the market situation for fluff pulp needs to be added
- Split views on minimum amount of SFM-certified pulp fibres
  - 70% is a good compromise
  - 70% is not ambitious enough
- Not in favour of introducing criteria on minimum presence of recycled fibres because of health reasons

Criterion 1.1 – Sourcing of Fluff Pulp
Further research – market analysis

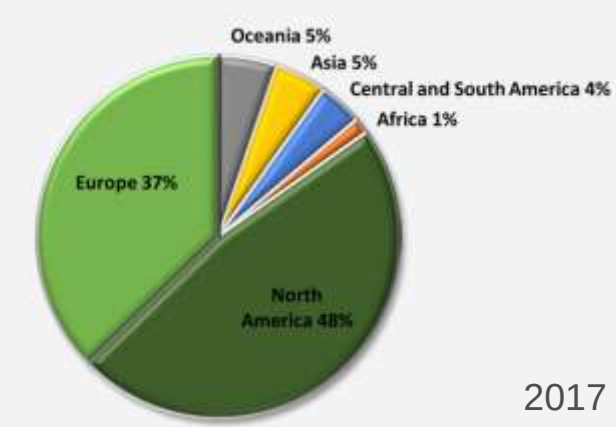
- Global market
- Relies on wood fibres from softwood species

75 - 85%

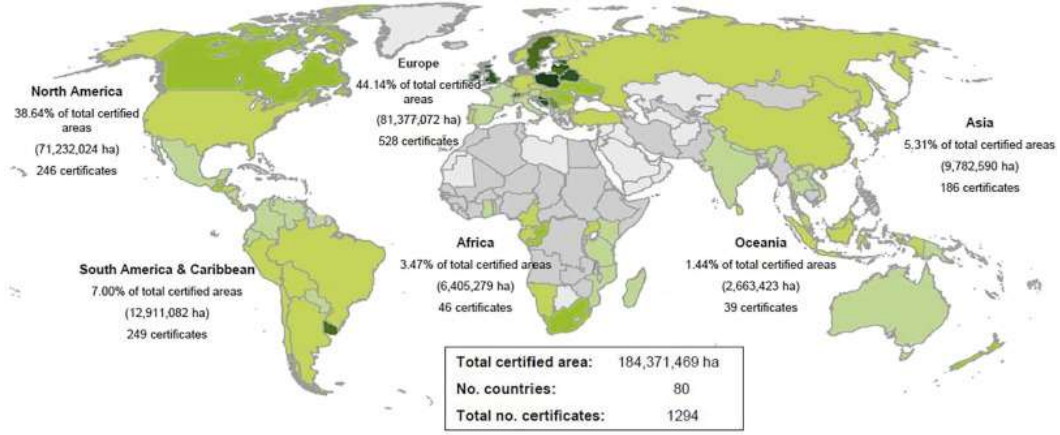
5%

Criterion 1.1 – Sourcing of Fluff Pulp
Further research – market for SFM fibres

- FSC + PEFC = 435.5 million ha (2020)
- 10.7% of total global forest area,
  39% of production forest area



Confirmed the 70% proposal of TR1



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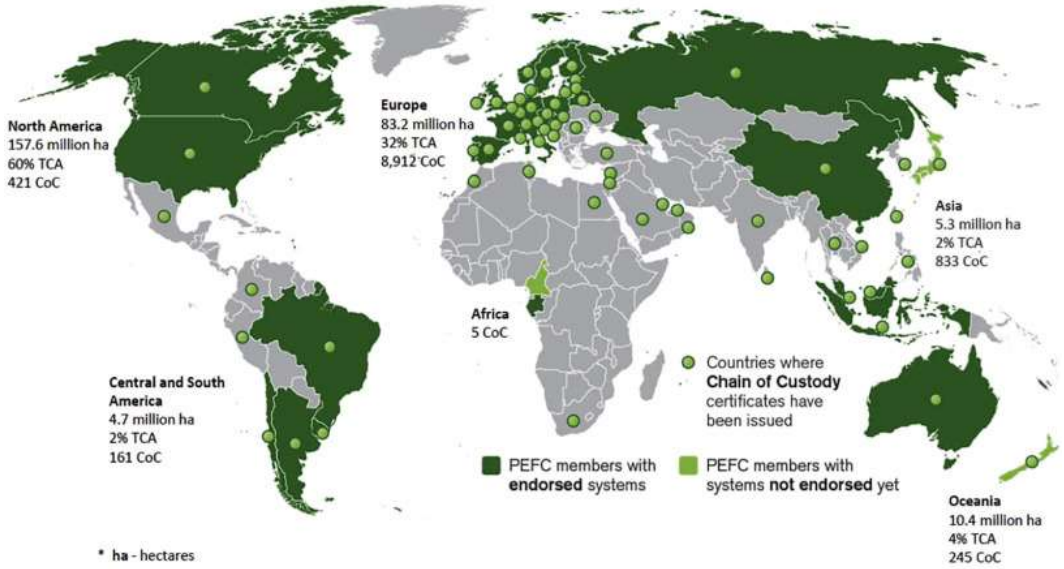

b)

Criterion 1.1 – Sourcing of Fluff Pulp
Further research – Claims vs label

- *FSC 100%, where 100% of material used are from forests covered by FSC SFM certificates. This claim leads to the FSC 100% label;*
- *FSC Mix XX%, within the percentage system, where the percentage of material covered by FSC SFM certificates and/or recycled material is specified in the claim. The remaining material is from controlled sources. Non-eligible sources are not allowed. If the XX% is more than 70%, the product can carry the FSC Mix label;*
- *FSC Mix Credit, within the credit system, where the material is 100% from credits of FSC SFM certificates and/or recycled material. This claim leads to the FSC Mix label;*
- *FSC Recycled XX%, within the percentage system, where the percentage of recycled material is specified in the claim. The remaining material is from controlled sources. Non-eligible sources are not allowed. If the XX% is 100%, the product can carry the FSC Recycled label;*
- *FSC Recycled Credit, within the credit system, where the material is 100% from credits of recycled material. This claim leads to the FSC Recycled label;*
- *FSC Controlled, where the input material is not from SFM forests but is controlled either through verification or through a risk assessment, in order to avoid unacceptable sources such as illegally harvested wood and wood from genetically modified trees. This claim does not lead to a label.*
- *x% PEFC certified, where x% percentage of material covered by PEFC SFM certificates and/or recycled material (less than 100%) is specified in the claim. Any remaining material content is from controlled sources. If x% is higher than 70%, the claim leads to the PEFC Certified label;*
- *PEFC Recycled, where 100% of the content is from recycled fibres. This claim leads to the PEFC Recycled label;*
- *PEFC Controlled, covering forest- and tree-based material for which a Due Diligence System is in place that shows that there is "negligible risk" that the material is from controversial sources. This claim does not lead to any label.*

Criterion 1.1 – Sourcing of Fluff Pulp
Further research – Claims vs label

- *FSC 100%, where 100% of material used are from forests covered by FSC SFM certificates. This claim leads to the FSC 100% label;*
- *FSC Mix XX%, within the percentage system, where the percentage material covered by FSC SFM certificates and/or recycled material specified in the claim. The remaining material is from contr Non-eligible sources are not allowed. If the XX% is m product can carry the FSC Mix label;*
- *FSC Mix Credit, within the credit sy terial is 100% from credits of FSC SFM certificate aterial. This claim leads to the FSC Mix label;*
- *FSC Recycled XX ntage system, where the percentage of re pecified in the claim. The remaining material is rces. Non-eligible sources are not allowed. If the X oduct can carry the FSC Recycled label;*
- *ed Credit, within the credit system, where the material is 10 credits of recycled material. This claim leads to the FSC Recycled label;*
- *FSC Controlled, where the input material is not from SFM forests but is controlled either through verification or through a risk assessment, in order to avoid unacceptable sources such as illegally harvested wood and wood from genetically modified trees. This claim does not lead to a label.*

Both % and credit systems accepted

- *x% PEFC certified, where x% percentage of material covered by PEFC SFM certificates and/or recycled material (less than 100%) is specified in the claim. Any remaining material content is from controlled sources. If x% is higher than 70%, the claim leads to the PEFC Certified label;*
- *PEFC Recycled, where 100% of the content is from recycled fibres. This claim leads to the PEFC Recycled label;*
- *PEFC Controlled, covering forest- and tree-based material for which a Due Diligence System is in place that shows that there is "negligible risk" that the material is from controversial sources. This claim does not lead to any label.*

Criterion 1.1 – Sourcing of Fluff Pulp
Further research – Claims vs label

- *FSC 100%, where 100% of material used are from forests covered by FSC SFM certificates. This claim leads to the FSC 100% label;*
- *FSC Mix XX%, within the percentage system, where the percentage material covered by FSC SFM certificates and/or recycled material specified in the claim. The remaining material is from contr... Non-eligible sources are not allowed. If the XX% is m... product can carry the FSC Mix label;*
- *FSC Mix Credit, within the credit sy... terial is 100% from credits of FSC SFM certificate... material. This claim leads to the FSC Mix label;*
- *FSC Recycled XX... ntage system, where the percentage of re... pecified in the claim. The remaining material is ... rces. Non-eligible sources are not allowed. If the X... oduct can carry the FSC Recycled label;*
- *...ed Credit, within the credit system, where the material is 10... credits of recycled material. This claim leads to the FSC Recycled label;*
- *FSC Controlled, where the input material is not from SFM forests but is controlled either through verification or through a risk assessment, in order to avoid unacceptable sources such as illegally harvested wood and wood from genetically modified trees. This claim does not lead to a label.*

Both % and credit systems accepted

- *x% PEFC certified, where x% percentage of material covered by PEFC SFM certificates and/or recycled material (less than 100%) is specified in the claim. Any remaining material content is from controlled sources. If x% is higher than 70%, the claim leads to the PEFC Certified label;*
- *PEFC Recycled, where 100% of the content is from recycled fibres. This claim leads to the PEFC Recycled label;*
- *PEFC Controlled, covering forest- and tree-based material for which a Due Diligence System is in place that shows that there is "negligible risk" that the material is from controversial sources. This claim does not lead to any label.*

Proposed to refer in the legal text to the wood raw material used for the production of the fluff pulp, and not anymore to the pulp fibres

Criterion 1.1 – Sourcing of Fluff Pulp
Further research – recycled fibres

- Degradation of the quality → export to China
- For AHP recycled fibres is not common practice
  - Not even in layers not in contact with the skin
- Difficult to trace the recycled fibres and verification by the CBs
- Other labels do not set requirements on recycled fibres

Not proposed to include recycled fibres

Second proposal for sub-criterion 1.1: Sourcing of fluff pulp

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

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 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.

Questions and comments?

First proposal for criterion 1.2: Bleaching

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

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

The AOX emissions from the production of each pulp each used in EU Ecolabel absorbent hygienic product shall not exceed 0,150 kg/ADt.

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

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

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

Measurements of AOX emissions to water shall be taken on [...]. The removal efficiency factor shall be based on information provided by the operator of the municipal or other third-party wastewater treatment plant.

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

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

Criterion 1.2 – Bleaching of Fluff Pulp
Feedback from the 1st consultation

❖Split views as to the ambition level

In favour of the AOX emission value proposed in the TR1, and in general of harmonising the criterion with the EU Ecolabel for graphic paper

Nowadays AOX levels are not related to the ecotoxicity of the effluent characteristics, and the current AOX limit should be kept.
+
high level of measurement uncertainty

Criterion 1.2 – Bleaching of Fluff Pulp
Further research – ECF vs TCF

Elemental chlorine free (ECF) bleaching: when no molecular or gaseous chlorine is dosed in the bleaching, ClO_2 is used instead

Totally chlorine free (TCF) bleaching: no Cl is used for bleaching

↓

Some mills have modified their bleaching sequence

→ ECF pulp is dominating the world bleached chemical pulp market

Criterion 1.2 – Bleaching of Fluff Pulp
Further research – ECF vs TCF

Elemental chlorine free (ECF) bleaching: when no molecular or gaseous chlorine is dosed in the bleaching, ClO2 is used instead

Totally chlorine free (TCF) bleaching: no Cl is used for bleaching

↓

Some mills have modified their bleaching sequence

→ ECF pulp is dominating the world bleached chemical pulp market

The superiority of TCF over ECF is questionable, as both present a negligible environmental risk to aquatic ecosystems

Absence of significant differences in biological effects in the aquatic environment

Only modern ECF technology has a similar environmental performance as TCF

Criterion 1.2 – Bleaching of Fluff Pulp
Further research – AOX levels

Depends on:

- Application of the pulp (AHP: specialty application, higher brightness needed)
- Wood species used, process parameters and influent conditions of the mill (softwood pulp requires higher bleaching)
- Wastewater treatment type

Reference	AOX (kg/ADt)
BAT limit[1]	0.2
Nordic Swan	0.15
Blue Angel	0.12
EU companies (all applications)[2]	0.07-0.103
EU company (fluff pulp for AHP) [1]	0.4
US BAT[3]	0.272
US companies (av./max) [2]	0.12 / 0.3

[1] data from 2010; [2] data from 2020; [3] data from 2000

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[1] data from 2010; [2] data from 2020; [3] data from 2000

AOX limit proposed: 0.14 kg/ADt

Second proposal for sub-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 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 [...] 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 1.2 – Bleaching of Fluff Pulp

Question to stakeholders
The BREF document proposed much higher AOX limits for sulphite pulp (0.5-1.5 mg/l). Should the EU Ecolabel differentiate between these two types of processes (kraft vs sulphite), similar to the approach in sub-criterion 1.3?

Questions and comments?

First proposal for criterion 1.3: Emission of COD and P to water and of S compounds and NOx to air

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 1,3.

— 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 and for the paper production are given in the Table 1. Finally, the total emissions shall be divided by the total reference value as shown in the following formula for COD:

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

Table 1 – Reference values for emissions from different pulp types

	Reference values (kg/ADT)			
	COD_{ref}	P_{ref}	S_{ref}	NOx_{ref}
Bleached chemical pulp (others than sulphite)	16,0	0,025(1) 0,09 (2)	0,35	1,6
Bleached chemical pulp (sulphite)	24,0	0,045	0,75	1,6
CTMP	16,0	0,008	0,2	0,3

Criterion 1.3 – Emissions of COD, P, S, NOx
Feedback from the 1st consultation

- P levels are mostly unattainable for US actors
- Emission limits for unbleached and semi-bleached pulps are missing
- Insufficient clarity as to what sources of S and NOx diffuse emissions are included in the calculations
- Continuous measurement requirement for emissions of S and NOx is not practical

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- Insufficient clarity as to what sources of S and NOx diffuse emissions are included in the calculations
- Continuous measurement requirement for emissions of S and NOx is not practical

All limits were re-analysed

Criterion 1.3 – Emissions of COD, P, S, NOx
Further research - COD

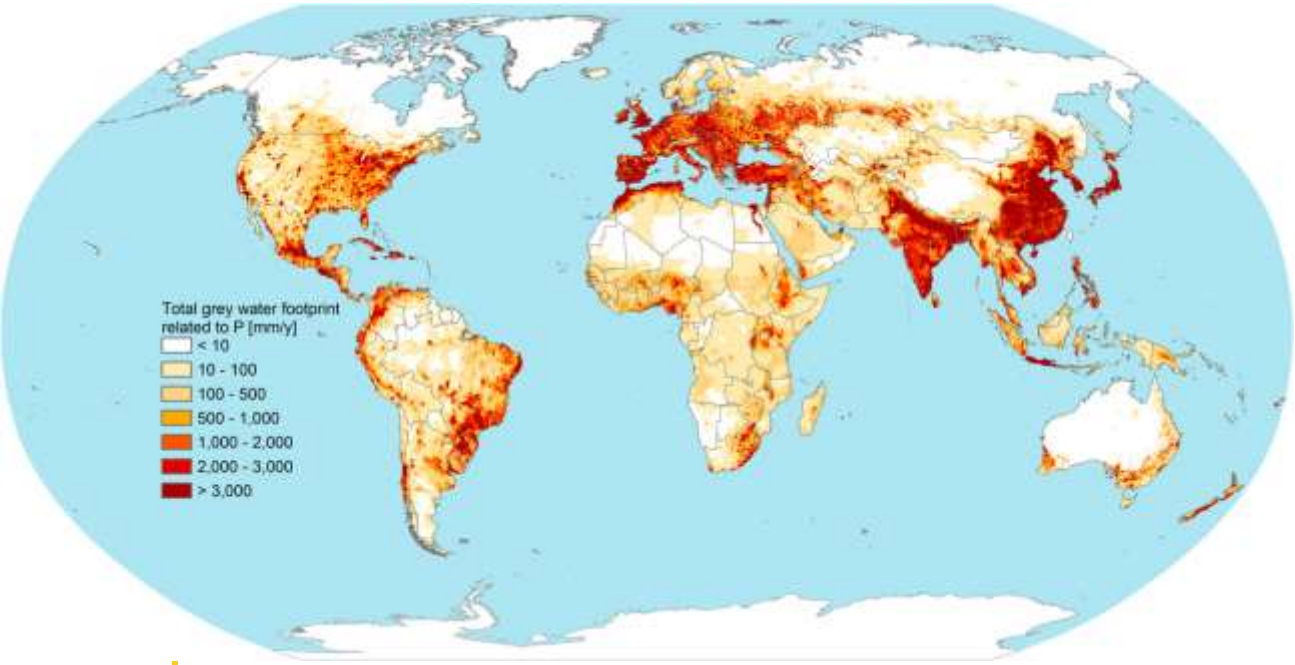
- Bleached kraft pulp: keep the TR1 limit of 16 kg COD/ADt
- Unbleached kraft pulp: 6.5 kg COD/ADt NEW
- Bleached sulphite pulp: keep the TR1 limit of 24 kg COD/ADt
- CTMP: brought back to 15 kg COD/ADt
- NSSC pulp: 11 kg COD/ADt NEW
- Measurement frequency: weekly

Criterion 1.3 – Emissions of COD, P, S, NOx
Further research - P

- Bleached kraft pulp: relax the TR1 limit to 0.03 kg P/ADt
- Unbleached kraft pulp: 0.02 kg P/ADt NEW
- Bleached sulphite pulp: tightened at 0.03 kg P/ADt
- CTMP: brought back to 0.01 kg P/ADt
- NSSC pulp: 0.02 kg P/ADt NEW
- Measurement frequency: weekly

Criterion 1.3 – Emissions of COD, P, S, NOx
Further research – P from eucalyptus pulp

- Bleached kraft pulp: 0.03 kg P/ADt
  apart from eucalyptus pulp: 0.09 kg P/ADt
- BAT-AELs: 0.12 kg P/ADt for eucalyptus-based pulp



contains higher levels of P compared to other forest species used for pulp production in Europe and elsewhere

Even if no P is added to the biological treatment plant, the level in discharged effluents is much higher

Criterion 1.3 – Emissions of COD, P, S, NOx
Further research – P from US

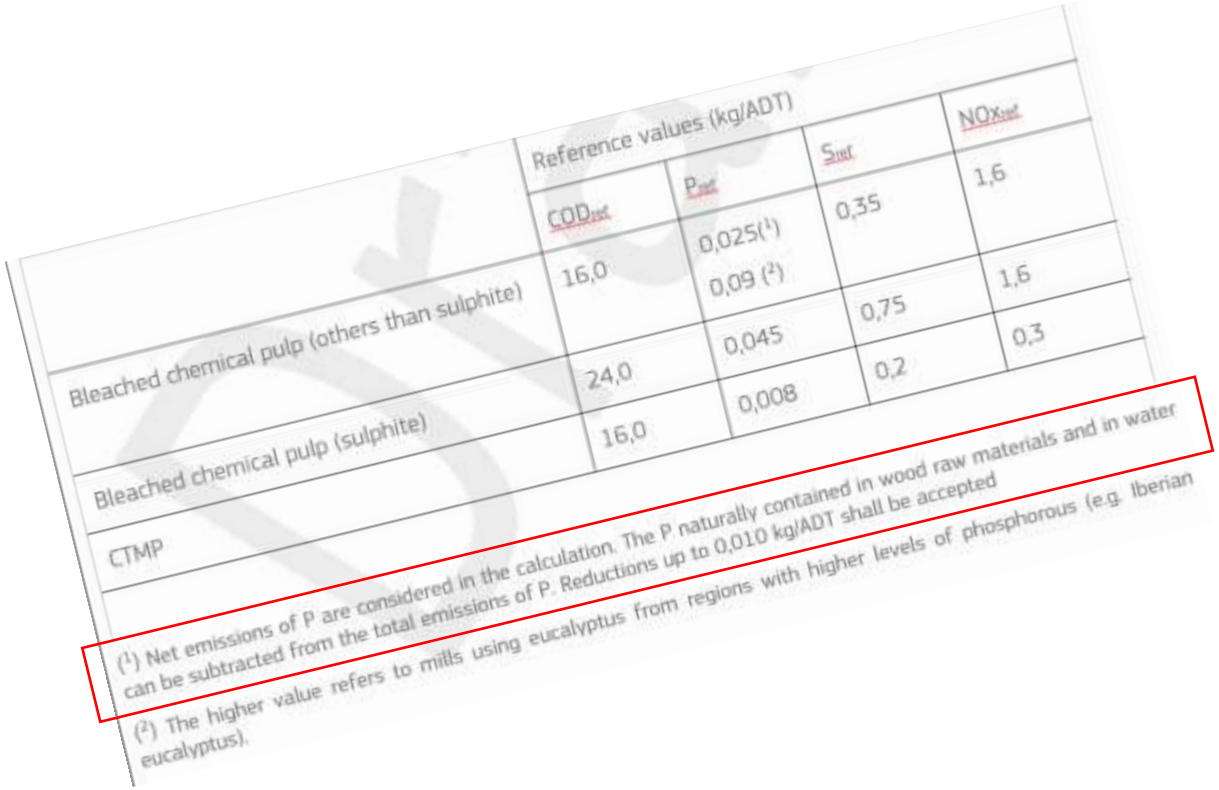
- Loblolly pine is the primary species used in fluff pulp production in the US
- Average P content in such wood: 0.054 kg P/t dry wood
- Average P content in fluff pulp: 0.125 kg P/Adt

Considering P partitioning during process and production yield

- ASB wastewater treatment
  does not add P but dispose it in the effluent

Possibility to exempt loblolly pine from the 0.03 kg P/ADt limit if shown that the supplementary addition of P is negligible

Criterion 1.3 – Emissions of COD, P, S, NOx
Further research – P footnote



	Reference values (kg/ADT)			
	COD_{ref}	P_{ref}	S_{ref}	NOx_{ref}
Bleached chemical pulp (others than sulphite)	16,0	0,025(1) 0,09 (2)	0,35	1,6
Bleached chemical pulp (sulphite)	24,0	0,045	0,75	1,6
CTMP	16,0	0,008	0,2	0,3

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

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

- P in wood as a raw material contributes to 0.11 kg P/Adt
- Confirmed by the info for loblolly pine
- Other ecolabels do not allow for this subtraction, nor the EU Ecolabel for graphic paper

Input from stakeholders is needed on whether a maximum of 0.01 kg P/ADt to be subtracted should be changed.

Criterion 1.3 – Emissions of COD, P, S, NOx
Further research – S compounds (SO2 + TRS)

- Bleached kraft pulp: keep the TR1 limit at 0.35 kg S/ADt
- Unbleached kraft pulp: 0.35 kg S/ADt NEW
- Bleached sulphite pulp: brought back at 0.6 kg S/ADt
- CTMP: kept at 0.2 kg S/ADt
- NSSC pulp: 0.4 kg S/ADt NEW
- Measurement frequency:
  every six months

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.

Criterion 1.3 – Emissions of COD, P, S, NOx
Further research – NOx

- Bleached kraft pulp: tighten the TR1 limit at 1.5 kg NOx/ADt
- Unbleached kraft pulp: 1.5 kg NOx/ADt NEW
- Bleached sulphite pulp: tightened at 1.5 kg NOx/ADt
- CTMP: kept at 0.3 kg NOx/ADt
- NSSC pulp: 1.5 kg NOx/ADt NEW
- Measurement frequency:
  every six months

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.

Second proposal for criterion 1.3: Emission of COD and P to water and of S compounds and NOx to air

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 [...] and summed together. The reference values for each pulp type used and for the paper production are given in the Table 1. Finally, the total emissions shall be divided by the total reference value as shown in the following formula for COD:

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

Table 1 – Reference values for emissions from different pulp types

	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	16,0	0,008	0,2	0,3
NSSC	11	0,02	0,4	1,5

Criterion 1.3 – Emissions of COD, P, S, NOx

Question to stakeholders
• Would you agree with introducing a higher P limit emission for loblolly pine in case negligible amount of P is added during the effluent treatment? (negligible amount to be defined further) • Would you rather prefer to set a value of P naturally contained in the wood that can be subtracted, with the value being higher than current 0.01 kg P/ADt? • Or should none of the above being taken into consideration?

Questions and comments?

First proposal for criterion 1.4: Emissions of CO2 from production

CO2 emissions from non-renewable energy sources shall not exceed 450 kg per tonne of pulp produced, including emissions from the production of electricity (whether on-site or off-site). Reference emission values according to Table 2 shall be used in the calculation of CO2 emission from fuels.

Table 2. Reference values for CO2 emissions from different energy sources

Fuel	CO_2 emissions	Unit
Coal	95	g CO2 fossil/MJ
Crude oil	73	g CO2 fossil/MJ
Fuel oil 1	74	g CO2 fossil/MJ
Fuel oil 2-5	77	g CO2 fossil/MJ
LPG	69	g CO2 fossil/MJ
Natural Gas	56	g CO2 fossil/MJ
Grid Electricity	400	g CO2 fossil/kWh

Second proposal for criterion 1.4: Emissions of CO2 from production

CO2 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 CO2 shall be 900 kg CO2/ADt. Reference emission values according to Table 2 shall be used in the calculation of CO2 emission from fuels. If needed, CO2 emission factors for other fuels can be found in Annex VI to Regulation (EU) 2018/2066.

Table 2. Reference values for CO2 emissions from different energy sources

Fuel	CO_2 emissions	Unit	Reference
Coal	94.6	g CO2 fossil/MJ	Regulation (EU) 2018/2066
Crude oil	73.3	g CO2 fossil/MJ	Regulation (EU) 2018/2066
Fuel oil 1	74.1	g CO2 fossil/MJ	Regulation (EU) 2018/2066
Fuel oil 2-5	77.4	g CO2 fossil/MJ	Regulation (EU) 2018/2066
LPG	63.1	g CO2 fossil/MJ	Regulation (EU) 2018/2066
Natural Gas	56.1	g CO2 fossil/MJ	Regulation (EU) 2018/2066
Grid Electricity	376	g CO2 fossil/kWh	Regulation (EU) 2019/331

Second proposal for criterion 1.4: Emissions of CO2 from production

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.

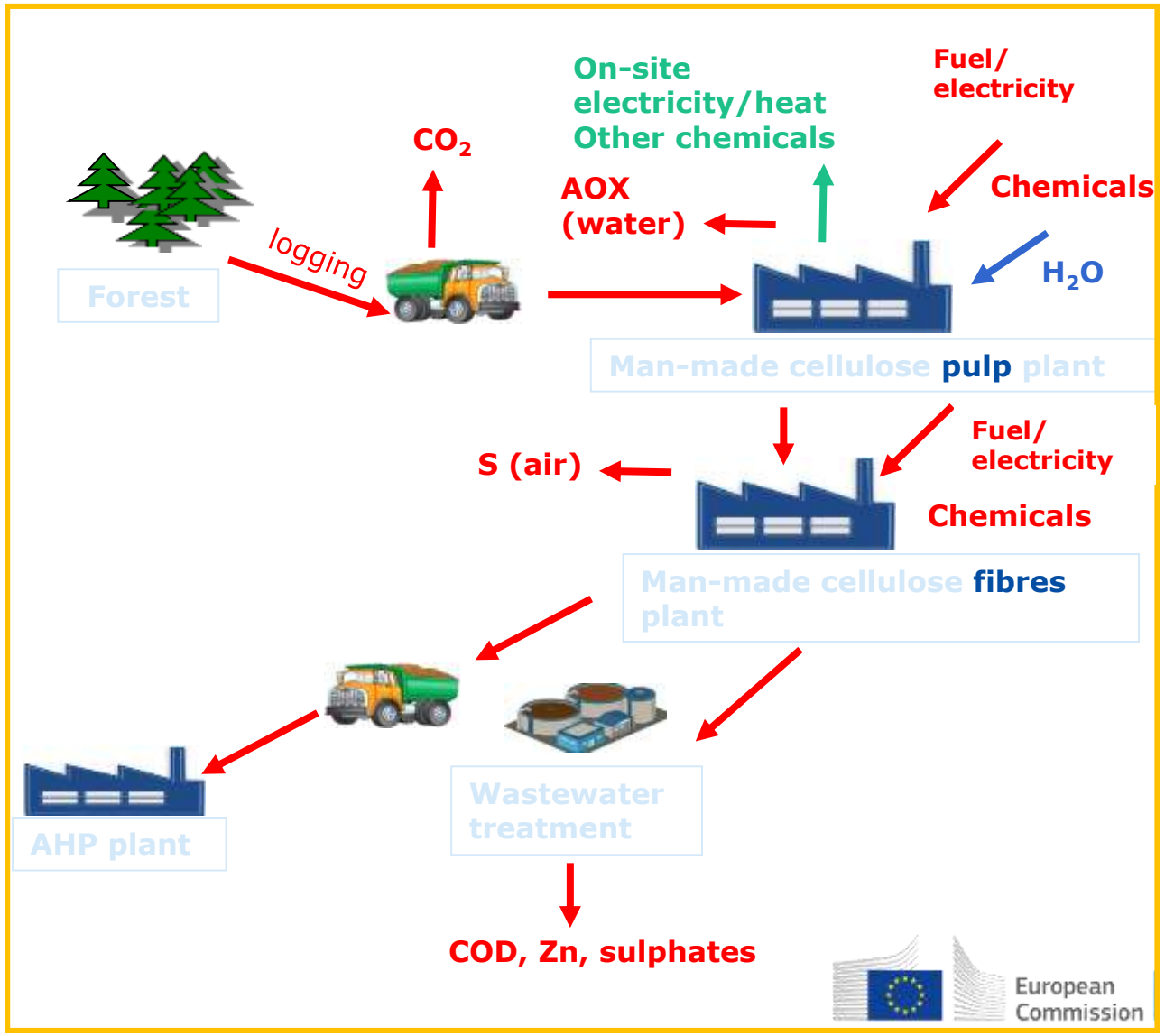
Questions and comments?

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

2.1 Sourcing of man-made cellulose fibres

2.2 Bleaching of man-made cellulose fibres

2.3 Production of man-made cellulose fibres



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

First proposal for sub-criterion 2.1: Sourcing of man-made cellulose fibres

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

Assessment and verification:

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

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

Feedback from the 1st consultation

- 12 comments from stakeholders to sub-crit. 2.1.
- MMCF definition added.
- Split views on minimum amount of SFM-certified fibres.
- *'There is a significant difference between paper pulp and dissolving wood pulp business'.* Also different from fluff pulp.
- Shortage of MMCF in Europe (only two companies in Europe, competition).

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

Sub-criterion 2.1 – Sourcing of man-made cellulose fibres

- Dissolving pulp process (textiles) also used for the MMCF for AHP.
- Percentages of MMCF vary within the products from around 10 to 30%.
- European market limited, Asia mainly China:

- Recent publication: FSC and/or PEFC certification for MMCF, reports an increment to around 55-60 % of all MMCF (2020).
- Other AHP ecolabels type I do not add criterion on sourcing.
- Proposal: 60% for the SFM certification for MMCF.

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

Sub-criterion 2.1 – Sourcing of man-made cellulose fibres

- Assessment and verification: wording clarifications.
- In general:
  - Alignment of the wording as much as possible with criterion 1;
  - Criterion 2 applies to the MMCF present in **≥ 1% w/w** of the final product;
  - Minimum threshold of 60% for the SFM certification;
  - Legal text: refer to the wood raw material used for the production of the dissolving wood pulp;
  - Acceptance of both the percentage and credit systems (as it is done currently);
  - Clarify in A&V text the case of dissolving wood pulp used in air-laid or nonwoven.

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

Second proposal for sub-criterion 2.1: Sourcing of man-made cellulose fibres

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.]*

(a) All ~~pulp fibres~~ (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 ~~70~~ 60 % ~~pulp fibres~~ 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 ~~pulp fibres~~ 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 ~~4.1~~ 3.1 for cotton (sourcing and traceability).

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

Second proposal for sub-criterion 2.1 – Sourcing of man-made cellulose fibres

Assessment and verification:

The applicant shall provide the competent body ~~detailed calculations showing compliance with this requirement, together with related supporting documentation.~~ 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.

~~(a) The~~ In addition, the applicant shall ~~obtain~~ provide audited accounting documents that demonstrate that at least 60 % of the wood raw materials used for the production of the ~~from the~~ dissolving wood pulp ~~manufacturer(s) valid, independently certified chain of custody certificates demonstrating that wood fibres~~ is defined as certified material according to valid FSC, PEFC or equivalent schemes ~~have been grown according to Sustainable Forestry Management principles and/or are from legal and controlled sources. FSC, PEFC or equivalent schemes shall be accepted as independent third party certification.~~

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.

~~(b) Invoices shall be provided which document that 70% of certified fibres have been allocated to the material they supply to the Absorbent Hygiene Product producer.~~

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

First proposal sub-criterion 2.2: Bleaching of man-made cellulose fibres
The pulp used to manufacture man-made cellulose fibres shall not be bleached with the use of elemental chlorine (Cl_2) gas. The resulting total amount of adsorbable organically bound halogens (AOX) and organically bound chlorine (OCl) shall not exceed either of the following: — ~~0,170~~ 0,150 kg/ADT, if measured in the wastewater from pulp manufacturing (AOX), ~~or~~ and — 150 ppm, if 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 either the AOX or the OCl requirement, 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 2.2 for fluff pulp.*

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

Feedback from the 1st consultation

- 5 comments from stakeholders to sub-crit. 2.2.
- Split views: in favour, against, clarification, alignment Crit. 1.
- European manufacturers can comply with both AOX and OCl however the Asian and American pulps may not be able to provide AOX (confidentiality, different regulation).
- TR2 proposal: alignment with the AOX limit of 0.140 kg AOX/ADt for fluff pulp and request also the analysis of OCl (<150 ppm) as Nordic Swan.

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

Second proposal sub-criterion 2.2: Bleaching of man-made cellulose fibres
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 ~~either of~~ the following: — 0,140 kg/ADT, ~~if~~ measured in the wastewater from pulp manufacturing (AOX), and — 150 ppm, ~~if~~ 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 ~~either~~ both the AOX ~~or~~ and 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 ~~2.2~~ 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 - Man-made cellulose fibres (including viscose, modal, lyocell, cupro, triacetate)

First proposal for sub-criterion 3.3: 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 sulphur compounds to air shall be respected in the viscose and in the modal fibres production process:

Table 3 - Viscose and modal fibres sulphur emission values

Fibre type	Sulphur emissions to air — Limit value (g/kg)
Staple fibre	20
Filament fibre	
— 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.

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

Feedback from the 1st consultation

- 5 comments from stakeholders to sub-crit. 2.3.
- Comments from stakeholders focused on the request to the addition of limit values for the emission of several compounds (zinc, COD and CS_2), and methods of measurement.

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

Further research as shown in TR2:

- Research on metal emissions, COD and S compounds.
- TR2 proposal: requirements for zinc, COD and SO_4^{2-} (sulphates) not for CS2 (sulphide) and methods of measurement have been added (in red newer additions)
- Reference: BREF document (1) for Polymers (Table 11.2 on emission and consumption data for viscose filament yarn production and Table 13.13- BAT associated emission and consumption levels for the production of viscose staple fibres).

(1) https://eippcb.jrc.ec.europa.eu/reference/production-polymers

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

Second proposal for sub-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 ~~sulphur~~ 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~~ SO_4^{2-} emissions to water — Limit value (~~mg/L~~ g/kg)
Staple fibre	20	~~0,16~~ 0,05	~~20~~ 5	~~0,3~~ 300
Filament fibre		~~0,3~~		
— Batch washing	40	0,10	5	200
— Integrated washing	170	0,50	6	250

Note: Limit values expressed as annual average. All values are expressed as g of pollutant per kg of product.

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

Second proposal for sub-criterion 2.3: Production of man-made cellulose fibres (including viscose, modal, lyocell, cupro, triacetate)

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) SO_4^{2-} (sulphates) ~~CS_2 (sulphide)~~ emissions to water: use method defined in ~~DIN 38405-27 or ISO 10530~~ ISO 22743.

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

Questions to stakeholders on criterion 2
• Is 60% SFM for MMCF achievable? Or shall we align with fluff pulp? Would that be achievable? • Shall we require only the value threshold of OCI for manufacturers of pulp for MMCF from outside Europe (sub-criterion 2.2) ? Any proposal from industry? • Stakeholders are kindly requested to provide input on adequacy of new set of requirements for sub-criterion 2.3.

Coffee break: 15 minutes

Morning session: 08:45-13:00

Opening of virtual room and welcome of participants	08:45 – 09:00
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Revised scope and definitions Update on the LCA screening study on AHPs	09:10 – 9:30
Criterion 1: Fluff pulp & Criterion 2: Man-made cellulose fibres	9:30 – 11:00
15 min break	
Criterion 3: Cotton and other natural cellulosic seed fibres & Criterion 4: Synthetic polymers and plastic materials	**11:15 – 11:45**
Criterion 5: Biodegradability Criterion 6: Material efficiency in the manufacturing	11:45 - 12:15
Criterion 7: Excluded and restricted substances	12:15 - 13:00
Lunch break	13:00-14:00

First proposal for criterion 3.1 – Sourcing and traceability

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

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

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, the US National Organic Programme (NOP) or those set by other trade partners. Verification shall be provided on an annual basis for each country of origin.

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

Criterion 3.1 – Sourcing and traceability
Feedback from the 1st consultation

- Few comments received
  - In favour of organic cotton only, as other schemes such as BCI do not have the same ambition level

Criterion 3.1 – Sourcing and traceability
Feedback from the 1st consultation

- Few comments received
  - In favour of organic cotton only, as other schemes such as BCI do not have the same ambition level

Clarified that **criterion 3 applies to the cotton material present in ≥ 1% w/w of the final product**

Second proposal for criterion 3.1 – Sourcing and traceability

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, 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.

First proposal for criterion 3.2 – Bleaching
Cotton shall not be bleached with the use of chlorine gas. *Assessment and verification:* *The applicant shall provide a declaration from the supplier that chlorine gas is not used.*

Second proposal for criterion 3.2 – Bleaching
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.

Questions and comments?

Criterion 4 - Synthetic polymers and plastic materials

- Title of this criterion has been modified to Synthetic polymers and plastic materials.
- Addition of definition for polymers (section 3 on TR2).
- Addition of bio-based plastic materials sub-criterion.

4.1 Production of synthetic polymers and plastic materials	4.2 Bio-based plastic materials

Criterion 4 - Synthetic polymers and plastic materials

First proposal for sub-criterion 5: Production of polymers
All plants producing synthetic polymers and plastic materials used in the product shall have implemented systems for: — 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 requirement from the suppliers. The declaration shall be supported by a report describing in detail the procedures adopted by the suppliers in order to fulfil the requirement for each of the sites concerned.*

Criterion 4 - Synthetic polymers and plastic materials

Feedback from the 1st consultation

- 6 comments from stakeholders to crit. 4.

- Comments from stakeholders focused on the title, definition of polymer, bio-based plastics and addition of verification systems such ISO 14001 or 50001.

- TR2 proposal: some text clarifications, keep systems for water, waste and energy and addition of:
  - ISO 14001 - Environmental Management System (EMS).
  - ISO 50001 - Energy Management System (EnMS).

Criterion 4 - Synthetic polymers and plastic materials

Second proposal for sub-criterion 4.1: ~~Production of polymers~~ Production of synthetic polymers and plastic materials
All plants producing synthetic polymers and plastic materials used in the final product shall have systems ~~implemented 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 - Synthetic polymers and plastic materials

Feedback from the 1st consultation

- NEW sub-criterion 4.2: Bio-based plastic materials.
- 1st AHWG: Stakeholders comments on addition of bio-based plastics.
- EUEB May 2022: Several comments against this sub-criterion.

Criterion 4 - Synthetic polymers and plastic materials

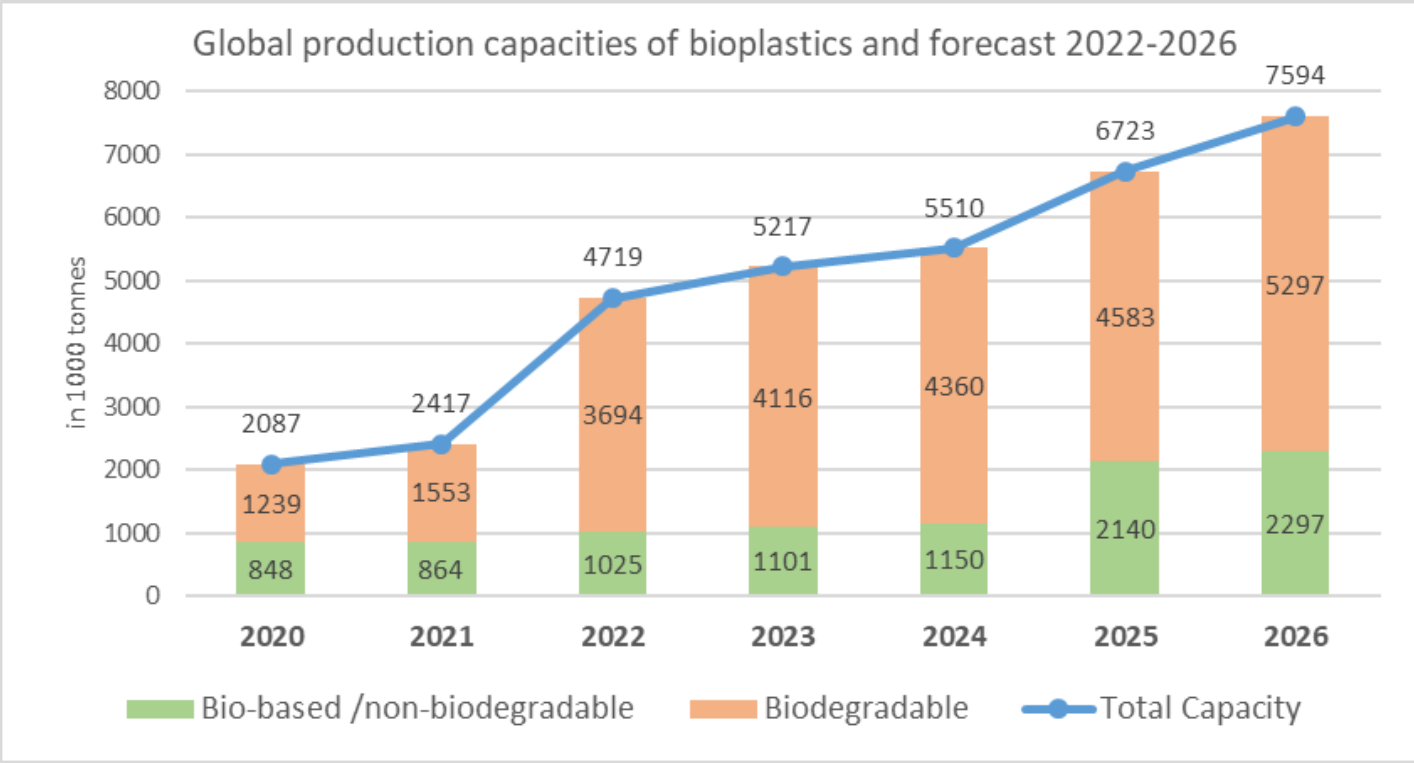
❖ NEW sub-criterion 4.2: Bio-based plastic materials.

Further research as shown in TR2:

- LCA screening study: SAP and polymers → main hotspots.
- Bio-based plastic materials → lower impacts in certain environmental categories compared to petrochemical plastics, and lower dependence on non-renewable fossil resources.
- It is not the intention of EUEL to label the AHP as bio-based but to include bio-based sources.

Criterion 4 - Synthetic polymers and plastic materials

- NEW sub-criterion 4.2: Bio-based plastic materials



- 2026: the share of bioplastics to overcome the current 1%.
- Other ecolabels type I include a share of bio-based plastics in AHP.
- TR2: table 21 → possible schemes accepted for this sub-criterion are listed.

European Commission

Criterion 4 - Synthetic polymers and plastic materials

- NEW sub-criterion 4.2: Bio-based plastic materials
  - Applies to final AHP 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 sourced from bio-based raw materials (not counting packaging).

Assessment and verification:

- *Valid chain of custody certificates for 100 % of the bio-based raw materials used.*
- *Bio-based carbon content tested in accordance to CEN/TS 16137.*

Criterion 4 - Synthetic polymers and plastic materials

Proposal for sub-criterion 4.2: Bio-based plastic materials - NEW
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.

Criterion 4 - Synthetic polymers and plastic materials

Proposal for sub-criterion 4.2: Bio-based plastic materials - NEW
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 4 - Synthetic polymers and plastic materials

Questions to stakeholders on criterion 4
• Should sub-criterion 4.1 aim to reduce water, waste and energy of synthetic polymer and plastic materials manufacturer sites to certain percentages compared to their last 5 years? • Which should be the ambition level of sub-criterion 4.2? (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 without counting packaging). • Should criterion 4.2 be maintained? Or should it be made voluntary?

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15 min break	
Criterion 3: Cotton and other natural cellulosic seed fibres & Criterion 4: Synthetic polymers and plastic materials	11:15 – 11:45
Criterion 5: Biodegradability **Criterion 6: Material efficiency in the manufacturing**	**11:45 - 12:15**
Criterion 7: Excluded and restricted substances	12:15 - 13:00
Lunch break	13:00-14:00

Criterion 5 – Biodegradability - NEW

Feedback from the 1st consultation

- 1st AHWG: Stakeholders comments on addition of this type of requirement.
- EUEB May 2022: Several comments against this criterion.

Criterion 5 – Biodegradability - NEW

Further research as shown in TR2:

- Trends in AHP include biodegradable and compostable products.
- End-of-life scenario play a primordial role.
- Criterion text:
  - Biodegradable and/or compostable materials, that must be certified by the supplier of that material.
  - Statement in primary packaging to guide consumers on how to dispose the AHP.
  - Assessment and verification: *declaration of compliance + certification standards such as EN 14995, ISO 14855, ISO 15985 or ISO 16929.*

Criterion 5 – Biodegradability - NEW

Proposal for criterion 5: Biodegradability - NEW
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 5 – Biodegradability - NEW

Questions to stakeholders on criterion 5
• Do you support the introduction of this criterion? • Shall the EU Ecolabel for AHP keep this requirement on a voluntary basis? • Do you have suggestions for possible modifications? • Stakeholders are invited to comment on biodegradability/compostability test methods.

Criterion 6 – Material efficiency in the manufacturing

First proposal for criterion 7: Material efficiency in the manufacturing
The quantity of waste generated during the manufacture and packaging of the products, at the net of the fraction that is reused or converted into useful materials and/or energy, shall not exceed: — 10% by weight of the end products for tampons, — 5% by weight of the end products for all the other products. *Assessment and verification:* *The applicant shall provide evidence of the quantity of waste that has not been reused within the manufacturing process or that is not converted into materials and/or energy.* *Calculations shall be shown in accordance with ISO 14025 and the applicant shall present all of the following parameters concerning:* — *the weight of product and packaging,* — *all the waste streams generated during the manufacture, and* — *the respective treatment processing (e.g. recycling, incineration), including the fraction of recovered waste and that disposed of.* *The net waste shall be calculated as the difference between the amount of waste produced and the amount of waste recovered.*

Criterion 6 – Material efficiency in the manufacturing

Feedback from the 1st consultation

- Stakeholders did not send comments to crit. 6.
- Further research:
  - ~ 40,000 disposable diapers used per minute = 1.3 tonnes/min (dry weight) of waste.
  - EU Ecolabel: stronger requirement during the product design and manufacturing.
  - In line with waste values (from CBs, July 2021) for several LHs: increment in level of ambition→ 8 % w/w for tampons and 4 % w/w for all the other products.
  - This criterion applies to the final absorbent hygiene product assembly site.

Criterion 6 – Material efficiency in the manufacturing

Second proposal for 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 ~~10~~ % by weight of the end products for tampons,

— 4 ~~5~~ % 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 6 – Material efficiency in the manufacturing

Question to stakeholders on criterion 6
• Are the new limits of waste generated during the manufacture and packaging of the products achievable? (i.e. 8 % w/ w for tampons and 4 % w/w for all the other products).

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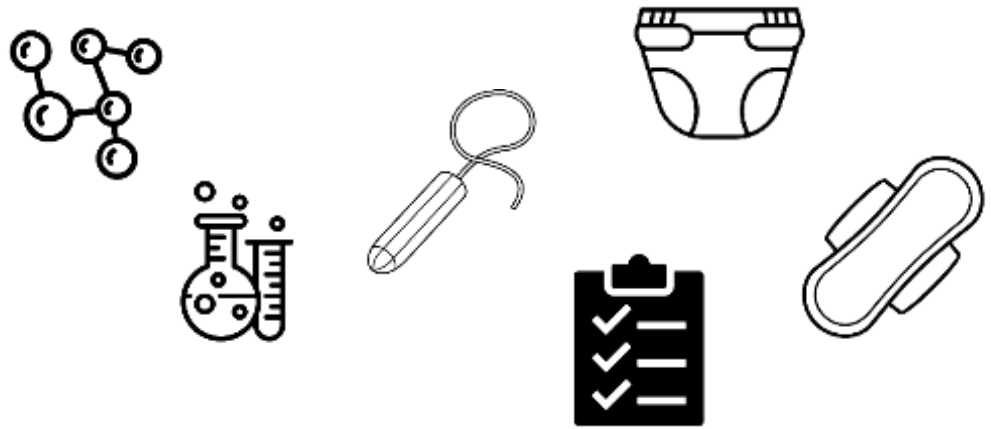
Criterion 7: Excluded and restricted substances	**12:15 - 13:00**
Lunch break	13:00-14:00

Criterion 7 – Restricted and excluded substances

7.1 Restrictions based on CLP Regulation

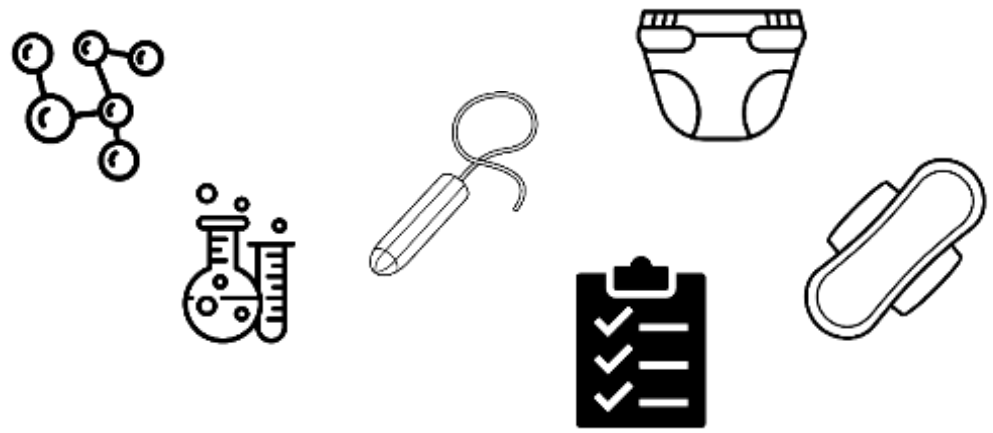
7.2 Substances of Very High Concern

7.3 Other specific restrictions



Criterion 7 – Restricted and excluded substances

- 7.1 Restrictions based on CLP Regulation
- 7.2 Substances of Very High Concern
- 7.3 Other specific restrictions



- 7.3.a Specified excluded substances
- 7.3.b Fragrances
- 7.3.c Lotions
- 7.3.d Inks and dyes
- 7.3.e Further restrictions applying to plastic materials
- 7.3.f Further restrictions applying to adhesives
- 7.3.g Super absorbent polymers
- 7.3.h Silcone
- 7.3.i Impurities of concern

First proposal for criterion 7.1 – Restrictions on substances classified under Regulation (EC) No 1272/2008 of the European Parliament and of the Council

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

- Group 1 hazards: Category 1A or 1B carcinogenic, mutagenic and/or toxic for reproduction (CMR): H340, H350, H350i, H360, H360F, H360D, H360FD, H360Fd, H360Df.
- Group 2 hazards: Category 2 CMR: H341, H351, H361, H361f, H361d, H361fd, H362; Category 1 aquatic toxicity: H400, H410; Category 1 and 2 acute toxicity: H300, H310, H330; Category 1 aspiration toxicity: H304; Category 1 specific target organ toxicity (STOT): H370, H372; Category 1 skin sensitisation H317; Category 1 respiratory Sensitization H334.
- Group 3 hazards: Category 2, 3 and 4 aquatic toxicity: H411, H412, H413; Category 3 acute toxicity: H301, H311, H331; Category 2 STOT: H371, H373.

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

Criterion 7.1 – Restriction based on CLP
Feedback from the 1st consultation

- More restrictive limits for hazardous substances 
- Different approach for substances with different hazards (like Nordic Swan and Blue Angel)
- Increase the clarity
- No derogation request received

Criterion 7.1 – Restriction based on CLP
Further research – concentration limit

- REACH, CLP + Chemicals Strategy
- AHP products stay in contact or inside the body for many consecutive hours
- Evidence of unwanted toxic chemicals in certain AHPs: formaldehyde, CMRs, PAHs, dioxins…
- Diaper dermatitis: sensitizing substances

Criterion 7.1 – Restriction based on CLP
Further research – concentration limit

- Industry standards are very high
- Nordic Swan: *"Chemical products used in the production/composition of sanitary products and additional components must not be subject to a classification requirement specified in Table 2"*
- Blue Angel prohibits substances and mixtures that are assigned certain H phrases according to the criteria of the CLP Regulation
- TiO2 is derogated by both Nordic Swan and Blue Angel

Criterion 7.1 – Restriction based on CLP
Further research – concentration limit

- Industry standards are very high
- Nordic Swan: *"Chemical products used in the production/composition of sanitary products and additional components must not be subject to a classification requirement specified in Table 2"*
- Blue Angel prohibits substances and mixtures that are assigned certain H phrases according to the criteria of the CLP Regulation
- CMRs, acute toxicity, STOT and sensitizers: **excluded**
  Haz. to the aquatic environment and to the ozone layer: restricted to **max 0.010 % w/w**
  Impurities in ingoing substances may still be present

Criterion 7.1 – Restriction based on CLP
Further research – Tests used

LoD
the lowest concentration or mass of an analyte, which can be detected with acceptable certainty, even though it cannot be quantified with acceptable precision

LoQ
the lowest concentration or mass of an analyte, which can be determined with an acceptable level of uncertainty
LoQ = 3 * LoD

Proposed that it is the LoQ that applies

Criterion 7.1 – Restriction based on CLP
Further research – Tests used

LoD
the lowest concentration or mass of an analyte, which can be detected with acceptable certainty, even though it cannot be quantified with acceptable precision

LoQ
the lowest concentration or mass of an analyte, which can be determined with an acceptable level of uncertainty
LoQ = 3 * LoD

Proposed that it is the LoQ that applies

Tests are not based on harmonized analytical methods (urine simulant vs. solvent extraction)
Need knowledge on what type of tests are already carried out and respective LoQ

Second proposal for criterion 7.1 – Restrictions on substances classified under Regulation (EC) No 1272/2008 of the European Parliament and of the Council

Unless derogated in Table 5, the final product, and any component articles therein, shall not contain ingoing substances (alone or in mixtures) 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

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 repeated exposure	H373 May cause damage to organs through 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

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.

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 ~~relevant~~ chemicals used in their production process, ~~together with~~ their ~~relevant~~ safety data sheet or chemical supplier declaration and any relevant declarations ~~from component article suppliers~~ that demonstrate the compliance with the requirement~~. Any chemicals containing substances or mixtures with restricted classifications under Regulation (EC) No 1272/2008 shall be highlighted~~.

For restricted substances and unavoidable impurities with a restricted classification, ~~The approximate dosing rate of the chemical, together with~~ the concentration of the restricted substance or ~~mixture in that chemical~~ impurity ~~(as provided in the Safety Data Sheet or supplier declaration)~~ and an assumed retention factor of 100%, shall be used to estimate the quantity of the restricted substance or ~~mixture~~ 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 ~~hazardous substance or mixture~~ impurity must be provided ~~in writing to the Competent Body~~.

~~For any restricted substances or mixtures that exceed 0.10% (weight by weight) of the final product, or of relevant component articles therein, a relevant derogation must be in place and proof of compliance with any relevant derogation conditions must be provided~~ 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 7.1 – Restriction based on CLP

Question to stakeholders
• Information on what type of substances tests are already carried out on final products and the respective LoQ are very welcome. • The Blue Angel has a derogation in place for Dipropylene glycol dibenzoate (classified as H412). Should it be considered for the EU Ecolabel as well? • Should the sentence “The above evidence can also be provided directly to competent bodies by any supplier in the applicant's supply chain” in the assessment and verification text be removed?

First proposal for criterion 7.2 – Restrictions on Substances of Very High Concern (SVHCs)

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

Assessment and verification

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

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

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

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

Criterion 7.2 – SVHCs
Feedback from the 1st consultation

- Same comments as for 7.1
- More restrictive limits for hazardous substances

- Different approach for substances with different hazards (like Nordic Swan and Blue Angel)
- Increase the clarity

Criterion 7.2 – SVHCs
Further research – concentration limit

- REACH, CLP + Chemicals Strategy
- Nordic Swan: *"Chemical products used in the production/composition of sanitary products and additional components must not contain Substances on the Candidate List"*
- Blue Angel: SVHCs prohibited in end products

SVHCs proposed to be **excluded**
Impurities in ingoing substances may still be present

Second proposal for 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* 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 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.

Questions and comments?

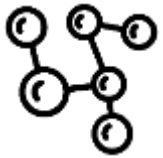
First proposal for criterion 7.3.a – Specified excluded substances

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

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

Criterion 7.3.a – Specified excluded substances - Feedback from the 1st consultation

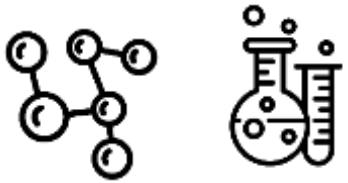
- *"This criterion, as it is written now, is completely impossible to verify. When you know how many different materials a AHP consists of and how long the supply chain is then you understand that you are not going to get the declarations needed. No supplier will sign a declaration that there are zero impurities in their material, not because they think that there are but because they can't guarantee the absence, because they are relying on the information they get from their suppliers"*



Criterion 7.3.a – Specified excluded substances – Further research

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

- Impurities may still occur up to 0.0100% w/w
- For test methods and thresholds: EDANA Stewardship Programme and the OEKO TEX Standard 100
  - Not all substances that are listed in 7.1
  - No info on LoD nor LoQ



Criterion 7.3.a – Specified excluded substances – Further research

Substances	Test method	Principle	LoD	LoQ
Phthalates	ISO 14389:2014 (1) Textiles — Determination of the phthalate content — Tetrahydrofuran method	Solvant extraction Ultra sound bath Plastic precipitation by solvent Centrifugation GC-MS analysis	40-200 mg/kg	120-600 mg/kg
Organotin compounds	IDF.IN.ANA.214 (SCL internal test method)	Solvant extraction Filtration Concentration GC-MS analysis	15-30 mg/kg	40-90 mg/kg
Formaldehyde	SCL internal test method adapted from ISO 14184-1:2011 Textiles — Determination of formaldehyde — Part 1: Free and hydrolysed formaldehyde (water extraction method)	Acid water extraction Colouring Spectrometry analysis	0.11 mg/kg (2)	0.35 mg/kg

Second proposal for 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 shall not be intentionally added to superabsorbent polymers;

iii. Alkyl phenol ethoxylates (APEOs) and other alkyl phenol derivatives [1]. Sterically hindered phenolic antioxidants with molecular weight (MW) >600 g/mole are allowed;

iv. Formaldehyde and formaldehyde releasers [2];

v. Methylisothiazolinone (MIT)

vi. Nanosilver

vii. Nitromusks and Polycyclic musks;

viii. Organotin compounds used as a catalysts in the production of silicon;

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.

First proposal for criterion 7.3.b – Fragrances

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

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

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

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

Criterion 7.3.b – Fragrances
Feedback from the 1st consultation

- Many stakeholders supported the full exclusion of fragrances
- Fragrances without allergens as listed in the EU Cosmetic Regulation are proven to be safe and could be permitted by the EU Ecolabel for AHP

Criterion 7.3.b – Fragrances
Feedback from the 1st consultation

- Many stakeholders supported the full exclusion of fragrances
- Fragrances without allergens as listed in the EU Cosmetic Regulation are proven to be safe and could be permitted by the EU Ecolabel for AHP

Proposed to prohibit the use of fragrances in all products + allow the use of odor control substances in adult incontinence products

Second proposal for 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.

Second proposal for 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.

Question to stakeholders

- Definition of odour control substances?
- Odour control substances may hold an harmonised classification (e.g. H332, H373, H400, H410), and therefore are banned according to criterion 7.1. Should these substances be derogated? They are derogated in Nordic Swan

First proposal for criterion 7.3.c – Lotions

Lotions shall not be used in feminine care pads, tampons and nursing pads. The use of lotions in other products shall be indicated on the packaging.

Feedback from stakeholders:

- Many stakeholders supported the full exclusion of lotions
- One stakeholder expressed the safety of petrolatum-based ointment in baby diapers

Criterion 7.3.c – Lotions
Further research

- Literature indicates the use of disposable, superabsorbent, and breathable diapers to fight diaper dermatitis - lotions and ointments not mentioned
- Not functional for the product
- Excluded by Nordic Swan and Blue Angel and supported by EUEB members

Second proposal for criterion 7.3.c – Lotions
Lotions shall not be used in the product, nor in any component thereof.

First proposal for criterion 7.3.d – Inks and dyes

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

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

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

Stakeholders asked for migration tests to justify the derogations

Criterion 7.3.d – Inks and dyes
Further research

- Migration tests may be challenging because
  - Life-cycle phase when migration occurs 
  - Factors affecting migration: contact time; physico-chemical properties of the material (e.g. pH, viscosity, etc.), the contact surface area, the type and amount of packaging material (plastic, silicone, the additive in plastic, plasticizer), the contact temperature
  - Additional cost for industries

Second proposal for 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(*).

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

Questions and comments?

First proposal for criterion 7.3.e – Further restrictions applying to plastic materials

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

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

- carcinogenic, mutagenic or toxic for reproduction, categories 1a, 1b and 2 (H340, H350, H350i, H360F, H360D, H360FD, H360Fd, H360Df),
- acutely toxic, categories 1 and 2 (H300, H310, H330, H304),
- toxic to specific target organs (STOT), category 1: (H370, H372),
- hazardous to the aquatic environment, categories 1 and 2 (H400, H410, H411).

Second proposal for criterion 7.3.e – Further restrictions applying to plastic materials

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

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

- carcinogenic, mutagenic or toxic for reproduction, categories 1a, 1b and 2 (H340, H350, H350i, H360F, H360D, H360FD, H360Fd, H360Df),
- acutely toxic, categories 1 and 2 (H300, H310, H330, H304),
- toxic to specific target organs (STOT), category 1: (H370, H372),
- hazardous to the aquatic environment, categories 1 and 2 (H400, H410, H411).

First proposal for 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:

- Colophony resins: Adhesives shall not contain more than 0.01% (weight by weight) colophony resin. Modified colophony derivatives that are not classified as sensitizers, e.g. rosin esters, are allowed;
- Formaldehyde: the content of free formaldehyde in hardened adhesive (glue) shall not exceed 10 ppm. The threshold for formaldehyde generated during adhesive production shall be 250 ppm, measured in newly produced polymer dispersion. Hotmelt adhesives shall be exempted from this requirement.

First proposal for 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:

- Colophony ~~resins~~: Adhesives shall not contain more than 0.01% (weight by weight) colophony resin. Modified colophony derivatives that are not classified as sensitizers, e.g. rosin esters, are allowed;
- Formaldehyde: the content of free formaldehyde in hardened adhesive (glue) shall not exceed 10 ppm. The threshold for formaldehyde generated during adhesive production shall be 250 ppm, measured in newly produced polymer dispersion. Hotmelt adhesives shall be exempted from this requirement.

First proposal for criterion 7.3.g – Superabsorbent polymers (SAP)

(i) Superabsorbent polymers used in the product shall contain a maximum of 1 000 ppm residual monomers that are classified with the H-codes reported in sub-criterion 6.1. For sodium polyacrylate this limit applies to the sum of unreacted acrylic acid and cross linking agents.

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

Second proposal for criterion 7.3.g – Superabsorbent polymers (SAP)
Superabsorbent polymers used in the product shall: (i) contain a maximum of 1 000 ppm residual monomers [4] that are classified with the H-codes reported in sub-criterion 7.1. For sodium polyacrylate this limit applies to the sum of unreacted acrylic acid and cross linking agents. (ii) as a maximum, contain 10 % (weight/weight) of water-soluble extracts [5] and these shall comply with sub-criteria 7.1, 7.2 and 7.3.a. For sodium polyacrilate these represent monomers and oligomers of acrylic acid with lower molecular weight than the superabsorbent polymer according to ISO 17190. [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.

First proposal for criterion 7.3.h – Silicone
(i) Solvent-based silicone coatings must 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 in concentrations above 800 ppm (0,08 % by weight).

Feedback from stakeholders:

- Unclarity of the requirement
- Working group held in November 2021

Criterion 7.3.h – Silicone
Further research


indiamart.com

The silicone/chemical supplier
Supplies the pure silicone or the silicone release coating formulation to the manufacturer of the release paper

The manufacturer of the release liner
Applies the silicone coating to the release liner. Different coating techniques can be used (e.g. metered coating, transfer, or size press) depending on the type of delivery system for the silicone release coating (e.g. solventless, solvent-based or emulsion).

The manufacturer of the AHP
Receives the release liner and assembles the final AHP

Criterion 7.3.h – Silicone
Further research

- D4, D5 and D6 are SVHCs because PBT properties → restricted by criterion 7.2
- However occur as impurities in the silicone coating in concentrations > 0.01% w/w

800 ppm proposed as threshold for the silicone mixture to be applied on the silicone coatings

Second proposal for 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. [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

Criterion 7.3.i – Impurities of concern
Feedback from the 1st consultation

- Several stakeholders and EUEB members asked to analyse the situation of trace presence of chemicals of concern in AHP
- ANSES opinion from 2018 on the safety of feminine hygiene products and from 2019 on the safety of baby diapers

Criterion 7.3.i – Impurities of concern
Feedback from the 1st consultation

- Several stakeholders and EUEB members asked to analyse the situation of trace presence of chemicals of concern in AHP
- ANSES opinion from 2018 on the safety of feminine hygiene products and from 2019 on the safety of baby diapers

Allergenic fragrances, VOCs, PAHs, pesticides, DnOP, formaldehyde, PCBs, dioxins and furans quantified or detected

No health risk effect for the users of feminine hygiene products
Health threshold was exceeded for six PAHs in baby diapers

Criterion 7.3.i – Impurities of concern
Feedback from the 1st consultation

- No regulatory action seems will be taken under REACH
- RAC: "*the proposed restriction is not justified because the risk could not be demonstrated and could not be characterized*"
- SEAC: "*there is not a sufficient justification that the REACH restriction would be proportionate*"

Criterion 7.3.i – Impurities of concern
Feedback from the 1st consultation

- Industry took action (EDANA Stewardship Programme)
- Chemicals are never intentionally added to the product, but are the result of trace contamination
- Given the CMR and ED properties and the continuous time of exposure → a new requirement is proposed
- Measurement frequency is set to twice a year

First proposal for 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

Substances	Restrictions
Formaldehyde	< 16 ppm
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	sum TEQ of the detected congeners of PCDDs, PCDFs and DLPCBs < 2ng/kg
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	
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	
PAHs	Each PAH < 0.2 mg/kg; Sum PAHs < 1 mg/kg
Phenols	Bisphenol A < 0.02 %; Nonylphenol-di-ethoxylate and Nonylphenol < 10 mg/kg
Pesticides	< 0.5 mg/kg
Organotins	Tributyltin < 2ppb; Other organotins: each < 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

Second proposal for criterion 7.3 – 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.

Second proposal for criterion 7.3 – Assessment and verification

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.

Questions and comments?

Afternoon session: 14:00-17:00

Lunch break	**13:00-14:00**
Criterion 7: Excluded and restricted substances (continued)	**14:00 – 15:00**
Criterion 8: Packaging	15:00 – 15:30
15 min break	
Criterion 9: Guidance on the disposal of the product and of the packaging Criterion 10: Fitness for use and quality of the product Criterion 11: Social Responsibility with regard to Labour Aspects Criterion 12: Information appearing on the EU Ecolabel	15:45 – 16:45
Conclusion, next steps and closure of the meeting	**16:45 – 17:00**

Afternoon session: 14:00-17:00

Lunch break	**13:00-14:00**
Criterion 7: Excluded and restricted substances (continued)	14:00 – 15:00
Criterion 8: Packaging	**15:00 – 15:30**
15 min break	
Criterion 9: Guidance on the disposal of the product and of the packaging Criterion 10: Fitness for use and quality of the product Criterion 11: Social Responsibility with regard to Labour Aspects Criterion 12: Information appearing on the EU Ecolabel	15:45 – 16:45
Conclusion, next steps and closure of the meeting	**16:45 – 17:00**

Criterion 8 – Packaging – proposed in TR1

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

Criterion 8 – Packaging – proposed in TR1

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

Criterion 8 – Packaging – proposed in TR1

Feedback from the 1st consultation

- 32 comments from stakeholders to crit. 8.
- Comments acknowledged the inclusion of a packaging criterion.
- Split views were shared on the inclusion of certain percentage of recycled, recyclable or bio-based content.
- Migration of chemicals from the packaging to product also highlighted.

Criterion 8 – Packaging

- AIM of this criterion: introduction of certain % of recycled and recyclable components in the packaging of AHPs (primary, secondary and additional component) → EU's goal of a circular economy.
- Removed now:
  - incorporation of product and packaging composition.
  - incorporation of new marking requirements: mandatory marking.
- Definitions:
  - Primary packaging (sales packaging): packaging conceived so as to constitute a sales unit to the final user or consumer at the point of purchase → requirements set in Crit. 8
  - Secondary packaging (grouped packaging): packaging conceived so as to constitute at the point of purchase a grouping of a certain number of sales units; it can be removed from the product without affecting its characteristics → requirements set in Crit. 8

Criterion 8 – Packaging

- Definitions (continuation):
  - Additional ~~packaging~~ 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 → NO requirements set in Crit. 8
  - Transport packaging (tertiary packaging): packaging conceived so as to facilitate handling and transport of a number of sales units or grouped packagings → NO requirements set in Crit. 8
  - Recyclability capacity means the amount (mass or percentage) of an item available for recycling
  - Recycled content means the amount of an item (by area, length, volume or mass) sourced from post-consumer and/or post-industrial recycled material
  - Recycling means, in accordance with Article 3 of Directive 2008/98/EC of the European Parliament and of the Council , 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'

Criterion 8 – Packaging

- LCA screening study → packaging made from LDPE granulates → hotspots in Resource Use – fossils, Climate Change and Ecotoxicity –freshwater.

- Recycled material in the product is prohibited while in the packaging could be fostered if not in direct contact with product.

- PROPOSAL in TR2: Increase in ambition level in TR2

- Recyclability: at least 95% (cardboard and plastic) [EN 13430 or ISO 18604]
- Recycled content (<u>if additional component</u>) [EN 45557 or ISO 14021]
  - 100 % for cardboard
  - 80 % for plastic
- <u>Only unmixed plastic without any coatings</u>

Criterion 8 – Packaging

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

Criterion 8 – Packaging

Second proposal for criterion 8: Packaging
This criterion applies to primary and secondary packaging, as defined in European Parliament and Council Directive 94/62/EC [(1)]. (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.

Criterion 8 – Packaging

Second proposal for criterion 8: Packaging
Assessment and verification: ~~*The applicant shall submit a signed declaration of compliance specifying the product composition, supported by manufacturer documentation, including the composition of the packaging (primary, secondary and additional).*~~ ~~*The applicant shall provide a sample of the primary packaging by submitting either a sample itself or a primary packaging photo (where information requested appears clearly).*~~ *The applicant shall submit (1) a signed declaration of compliance specifying the percentages of recycled content of the primary and secondary packaging; (2) ~~and~~ a declaration of compliance specifying the recyclability capacity ~~in~~ of the primary and secondary packaging ~~where the test methods used must be notified. Invoices demonstrating the purchase of the recycled material must be provided~~ 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.* *(1) 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).*

Criterion 8 – Packaging

Questions to stakeholders on criterion 8
• Are the % of recycled and recyclability capacity required for primary and secondary packaging achievable? • Should there be any hazardous chemicals tested in the packaging? • Are there any comments on the A&V test methods requested for compliance with this criterion? • Would you support the introduction of a requirement on displaying the ingredients included in AHPs for the EU Ecolabel? What are the requirements in your country?

Coffee break: 15 minutes

Afternoon session: 14:00-17:00

Lunch break	**13:00-14:00**
Criterion 7: Excluded and restricted substances (continued)	**14:00 – 15:00**
Criterion 8: Packaging	**15:00 – 15:30**
15 min break	
Criterion 9: Guidance on the disposal of the product and of the packaging **Criterion 10: Fitness for use and quality of the product** **Criterion 11: Social Responsibility with regard to Labour Aspects** **Criterion 12: Information appearing on the EU Ecolabel**	**15:45 – 16:45**
Conclusion, next steps and closure of the meeting	**16:45 – 17:00**

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

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

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

Feedback from the 1st consultation

- 6 comments from stakeholders to crit. 9.
- Comments:
  - Modification of the criterion as recycling facilities are not present in all MS.
  - Information on disposal: added to the primary packaging.
  - Request if compatible with national Extended Product Responsibility (EPR) in all European countries.

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

- AIM of this criterion: to provide the user with the correct information in order to dispose of the waste product and packaging in the most appropriate way.
- Recycling rates in MS investigation: packaging recycling rates are achieved in a different extend.
- EU Ecolabel does not include EPR.
- Requirements lines modified (more general).
- Title slightly modified.

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

Second proposal for criterion 9: Guidance on the disposal of the product and of the packaging
The primary packaging must contain ~~information~~ on the guidance regarding disposal of the primary packaging, the secondary packaging (if any), the additional ~~packaging~~ components and the product disposal. 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 ~~packaging~~ components 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. ~~— that the hygiene used products should be disposed of within the household waste.~~ ~~— that the primary packaging and additional packaging should be disposed of within the recyclable waste.~~ *Assessment and verification:* *The applicant shall provide a high resolution image of the primary packaging (where information regarding disposal appear clearly).*

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

Question to stakeholders on criterion 9
• Should the requested disposal information appear in the primary packaging?

Criterion 10 - Fitness for use and quality of the product

First proposal for criterion 10: Fitness for use and quality of the product

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

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

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

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

Criterion 10 - Fitness for use and quality of the product

First proposal for criterion 10: Fitness for use and quality of the product
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.*

Criterion 10 - Fitness for use and quality of the product

First proposal for criterion 10: Fitness for use and quality of the product
Additional guidelines for user tests. (Continuation 2/3) *— 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~~ 100 (for products that are not specifically designed for one gender). When products are specifically designed for one gender at least 30 test subjects should be included. All the individuals participating to the survey shall be current users of the specific type/size of product tested.* *— 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). ~~For absorption and leakage protection, leakage shall occur in less than 5 % of the products tested.~~* *— The results shall be statistically evaluated after the user trial has been completed.* *— External factors such as branding, market shares and advertising that may have an impact on the perceived performance of the products shall be communicated.*

Criterion 10 - Fitness for use and quality of the product

First proposal for criterion 10: Fitness for use and quality of the product
Additional requirements for technical tests. (Continuation 3/3) *— 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 10 - Fitness for use and quality of the product

Feedback from the 1st consultation

- 4 comments from stakeholders to crit. 10.
- Comments:
  - Only 30 test subjects shall be required in opposition to the 100 proposal.
  - Split views to the possibility of adding requirement on aerobic microorganisms test to tampons.
  - *No other comments in relation to modifications introduced in TR1.*

Criterion 10 - Fitness for use and quality of the product

- AIM of this criterion: to address the performance tests that AHP must undergo to fulfil characteristics and functions of the product.

Modifications/questions proposed in TR1 and kept in TR2:

- Panty liners derogation from requirement U1.
- Threshold for in-use test, U1-absorption and leakage protection: 80 % of the consumers testing the product shall rate the performance as satisfactory (instead of a leakage occurrence in less than 5 % of the product uses).
- Nursery pads technical tests, T1 and T2.
- The listing of the technical test methods for absorption and leakage protection was not requested.
- The addition of a requirement for tampons on aerobic microorganism content does not seem relevant.

Criterion 10 - Fitness for use and quality of the product

Changes in TR2:

- Slightly modification of the initial sentence: 'The efficiency/quality of the product shall be at least as satisfactory as the equivalent products already on the market'.

- 'Assessment and verification': 30 consumers tested for products not specifically designed for one gender as it was before the first TR1.

Criterion 10 - Fitness for use and quality of the product

Second proposal for criterion 10: Fitness for use and quality of the product

The efficiency/quality of the product shall be at least as satisfactory ~~and at~~ as the least equivalent of products already on the market. Fitness-for-use shall be tested with respect to the characteristics and parameters reported in Table ~~5~~ 8. Performance thresholds shall be matched, where these have been identified.

Table ~~5~~ 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 (*)	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

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

Criterion 10 - Fitness for use and quality of the product

Second proposal for criterion 10: Fitness for use and quality of the product
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.*

Criterion 10 - Fitness for use and quality of the product

Second proposal for criterion 10: Fitness for use and quality of the product
Additional guidelines for user tests. (Continuation 2/3) *— 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 ~~100~~ (for products that are not specifically designed for one gender). When products are specifically designed for one gender at least 30 test subjects should be included. All the individuals participating to the survey shall be current users of the specific type/size of product tested.* *— 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.*

Criterion 10 - Fitness for use and quality of the product

Second proposal for criterion 10: Fitness for use and quality of the product
Additional requirements for technical tests. (Continuation 3/3) *— 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~~ information provided in the application general assessment and verification text.*

Criterion 10 - Fitness for use and quality of the product

Questions to stakeholders on criterion 10
• Stakeholders' views are welcomed on any novel test methods developed in 2022 with application in this PG. • Shall the 'Additional guidelines for user and technical tests' be included only in the User Manual?

Criterion 11 – Corporate Social Responsibility with regard to Labour Aspects

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

Criterion 11 – Corporate Social Responsibility with regard to Labour Aspects

First proposal for criterion 11: ~~Social aspects~~ Corporate Social Responsibility with regard to Labour Aspects
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).

Criterion 11 – Corporate Social Responsibility with regard to Labour Aspects

First proposal for criterion 11: ~~Social aspects~~ Corporate Social Responsibility with regard to Labour Aspects

In locations where the right to freedom of association and collective bargaining are restricted under law, the company shall recognise legitimate employee associations with whom it can enter into dialogue about workplace issues.
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.

Assessment and verification:
~~The applicant shall demonstrate third party verification of compliance, using independent verification or documentary evidence, including site visits by auditors during the Ecolabel verification process for production sites in the supply chain for the licensed products. This shall take place upon application and subsequently during the license period if new production sites are introduced~~.
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.
(1) ILO NORMLEX (http://www.ilo.org/dyn/normlex/en) and supporting guidance.

Criterion 11 – Corporate Social Responsibility with regard to Labour Aspects

Feedback from the 1st consultation

- 10 comments from stakeholders to crit. 11.
- Comments:
  - Other proofs of compliance as requested by stakeholders.
  - This criterion should be kept (EUEB November 2021).
  - Inclusion of a requirement on Responsible Business Conduct (RBC).
  - Proportionality of the criterion in relation to SA8000, SEDEX or BSCI memberships.

Criterion 11 – Corporate Social Responsibility with regard to Labour Aspects

- AIM of this criterion: to set guidelines to ensure labour standard requirements fulfilled by companies applying for the EU Ecolabel, independently from national laws.
- *Modifications/questions proposed in TR1 and kept in TR2:*
  - *Harmonisation with the EU Ecolabel for footwear (European Commission, 2016).*
  - *This criterion should only apply to the production site of the final AHP product.*
- *Further research:*
  - *Current proposal is based on the International Labour Organisation's (ILO) Tripartite Declaration of Principles → it sets requirements for the fundamental rights principles at work.*

Criterion 11 – Corporate Social Responsibility with regard to Labour Aspects

- *Further research*
  - *Current proposal is based on the International Labour Organisation's (ILO) Tripartite Declaration of Principles → it sets requirements for the fundamental rights principles at work.*
  - *Comprehensive answers to comments are provided in TR2 and annexed Table of Comments: while the proposals are already taken into account or not related to labour aspects, the criterion has been kept similar to the TR1 proposal with slighty text modifications.*
  - *It is not the intention of the EU Ecolabel to add further burdens and extra requirement, so in the discussion time, please express your comments in relation to raised questions.*

Criterion 11 – Corporate Social Responsibility with regard to Labour Aspects

Second proposal for 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 ([1]), the UN Global Compact (Pillar 2) ([2]), the UN Guiding Principles on Business and Human Rights ([3]) and the OECD Guidelines for Multinational Enterprises ([4]), 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).

Criterion 11 – Corporate Social Responsibility with regard to Labour Aspects

Second proposal for criterion 11: Corporate Social Responsibility with regard to Labour Aspects
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.

Criterion 11 – Corporate Social Responsibility with regard to Labour Aspects

Second proposal for criterion 11: Corporate Social Responsibility with regard to Labour Aspects
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.* (1) ILO NORMLEX (http://www.ilo.org/dyn/normlex/en) and supporting guidance. (2) United Nations Global Compact (Pillar 2) https://www.unglobalcompact.org/what-is-gc/participants/141550 (3) Guiding Principles for Business and Human Rights https://www.unglobalcompact.org/library/2 (4) OECD Guidelines for Multinational Enterprises https://www.oecd.org/daf/inv/mne/48004323.pdf

Criterion 11 – Corporate Social Responsibility with regard to Labour Aspects

Questions to stakeholders on criterion 11
• Should this criterion be more specific on regards to Responsible Business Conduct (RBC)? • Nordic Swan and Blue Angel experts' views are welcome. • Shall a working group specific to this criterion be set up?

Criterion 12 - Information appearing on the EU Ecolabel

First proposal for criterion 12: Information appearing on the EU Ecolabel
The optional EU Ecolabel logo shall be applied on the primary packaging of the product. The optional label with box shall contain the following text: — ~~'Reduced impacts from consumption of resources',~~ — 'Restricted use of hazardous substances', — 'Product designed to reduce environmental impact', — 'Verified performance'. The applicant shall follow the instructions on how to properly use the EU Ecolabel logo provided in the EU Ecolabel Logo Guidelines: http://ec.europa.eu/environment/ecolabel/documents/logo_guidelines.pdf Assessment and verification: *The applicant shall provide a declaration of compliance with the requirement and visual evidence (photograph of the product). The photograph provided must be a high resolution image of the product packaging that clearly shows the label, the registration/licence number and, where relevant, the statements that can be displayed together with the label.*

Criterion 12 - Information appearing on the EU Ecolabel

Feedback from the 1st consultation

- No comments received to crit. 12.
- Criterion kept similar to the proposal in TR1.
- The verb ‘shall’ has been modified by ‘may’ to indicate optional indication of the EU Ecolabel logo.
- The order of the sentences are proposed to be modified.
- A&V: A slight modification, i.e. the addition of ‘primary’ to packaging has been added.

Criterion 12 - Information appearing on the EU Ecolabel

Second proposal for criterion 12: Information appearing on the EU Ecolabel
The ~~optional~~ EU Ecolabel logo may ~~shall~~ be applied on the primary packaging of the product. The optional label with box shall contain the following text: — 'Product designed to reduce impact on the environment', — Restricted use of hazardous substances', — '~~Product designed to reduce environmental impact',~~ — 'Verified performance'. The applicant shall follow the instructions on how to properly use the EU Ecolabel logo provided in the EU Ecolabel Logo Guidelines: http://ec.europa.eu/environment/ecolabel/documents/logo_guidelines.pdf Assessment and verification: *The applicant shall provide a declaration of compliance with the requirement and visual evidence (photograph of the product). The photograph provided must be a high resolution image of the product primary packaging that clearly shows the label, the registration/licence number and, where relevant, the statements that can be displayed together with the label.*

Criterion 12 - Information appearing on the EU Ecolabel

Questions to stakeholders on criterion 12
• No questions from JRC.

Criteria 9, 10, 11 & 12

Question to stakeholders on criterion 9
• Should the requested disposal information appear in the primary packaging?

Questions to stakeholders on criterion 10
• Stakeholders' views are welcomed on any novel test methods developed in 2022 with application in this PG. • Shall the 'Additional guidelines for user tests' be included only in the User Manual?

Questions to stakeholders on criterion 11
• Should this criterion be more specific on regards to Responsible Business Conduct (RBC)? • Nordic Swan and Blue Angel experts' views are welcome. • Shall a working group specific to this criterion be set up?

Next steps

- 8th June 2022: 2nd AHWG meeting on RMC (morning)
- Stakeholders can provide comments on technical report and criteria proposals not later than 20th June 2022
- Comments can be submitted in Word file or BATIS system
- Nov 2022: presentation at EUEB meeting and final open consultation
- March 2023: vote on revised criteria

Keep in touch

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Thank you

European Commission