



2<sup>nd</sup> Ad-Hoc Working Group (AHWG) meeting for the revision of EU Ecolabel criteria for the product group:

Absorbent Hygiene Products (AHP) & Reusable Menstrual Cups (RMC)

DAY 1

Absorbent Hygiene Products (AHP)

7<sup>th</sup> June 2022

Online Meeting (Webex)

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

Minutes of the meeting

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Agenda – Day 1 on Absorbent Hygiene Products (AHP)

07/06/2022

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

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

Afternoon session: 14:00-17:00 h

		SCHEDULE
1.	Criterion 7: Excluded and restricted substances (continued)	14:00 – 15:30
2.	<i>Criterion 8: Packaging</i>	15:00 – 15:30
	15 min break	
3.	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
4.	Conclusion, next steps and closure of the workshop	16:45 – 17:00

List of participant organizations – Day 1 on Absorbent Hygiene Products (AHP)

Abena Produktion  
Attindas Hygiene Partners Group  
CB Austria  
CB Belgium  
CB Bulgaria  
CB Denmark  
CB Germany  
CB Finland  
CB Italy / ISPRA  
CB Norway  
CB Portugal  
CB Sweden  
CEFIC  
Claripharm Laboratoire  
CORMAN SPA  
Deco Proteste Portugal  
DRYLOCK TECHNOLOGIES SL  
EDANA  
ELKEM Silicones  
Ence Energia y Celulosa  
EPIS, European Pulp Industry Sector AISBL  
Essity  
EU Commission DG Environment  
EU Commission DG Joint Research Centre  
European Bioplastics  
European Environmental Bureau EEB, BEUC  
Evonik - Superabsorbents  
EY  
Forest Stewardship Council (FSC)  
Georgia Pacific  
GROUP'HYGIENE  
Harp & associés  
International Paper  
Johnson & Johnson  
Kraton polymers  
Mondi  
National Council for Air and Stream Improvement (NCASI)  
Nippon Shokubai Europe N.V.  
OFI  
Pacific Gas and Electric (PG&E)  
PEFC  
Stora Enso  
Wacker Chemie AG

Note to readers:

The meeting was run in a web meeting format using the WEBEX platform. For each agenda point, a short presentation was given by JRC. Participants were asked to comment/ask questions concisely via chat function or orally. These comments were addressed by JRC.

## START OF DAY 1 (AHP)

Revised scope and definitions and Update on the LCA screening study on AHPs

### *Incontinence products*

The majority of the stakeholders opposed to the change of scope (inclusion) on adult incontinence products, while few showed full support.

One stakeholder asked how it was possible to market adult incontinence product in Europe in legal compliance without applying for a CE-mark. JRC indicated that, to its understanding, CE marking was voluntary, yet acknowledged that it might be understood as a difference between CE marked and not.

Another stakeholder manifested a lack of understanding on the rationale and asked about the market share of incontinence products without CE marking. JRC was not aware of this information (not publicly available) but, based on incontinence products volume data, the relevance was confirmed (doubled in the last 10 years).

Another stakeholder explained that the current definition is confusing and implies the need for Competent Bodies (CBs) to check product compliance (i.e. CE marked or not), not “seeing” the need for the change. JRC suggested including a declaration for Ecolabel applicants, indicating whether the product is registered under the medical devices regulation, to help CBs on their activity.

A stakeholder considered that all incontinence products should be part of the same group(s) (either CE marked or EU Ecolabel) and no different categorisation should be allowed. Otherwise, it might create challenges to companies (competence distortion). As it stands, current scope implies that no CE marked product would be able to apply for EU Ecolabel.

Another stakeholder indicated that medical devices are essential products for patients, thus they should not be subjects to ecolabel requirements.

A stakeholder supported the inclusion of incontinence products in the scope because: (a) these products are not medical devices (despite being used in medical set-ups); (b) other CE marked products do also have EU Ecolabel (i.e. Growing Media); (c) these items are relevant for Green Public Procurement.

JRC reasoned that these products are very similar in composition to other medical products (i.e. sanitary towels) plus 2020 survey showed 82% support on their inclusion in this product group.

A stakeholder requested to double check on adult incontinence and the CE marking requirement.

JRC indicated that further conversation with EU Commission colleagues will be held to see what could be done in this respect.

### *Ingoing substances*

Few stakeholders asked whether this was of application to substances “*intentionally added*” and, if so, modify the wording accordingly. JRC clarified that it does not only applied to *intentionally added* substances but also to all substances that are known to be in the final product. If there are impurities that are known they will be released in the product, they would fall under the definition proposed for ingoing substances.

### *Reusable (textile) products*

Several stakeholders made comments on the exclusion of reusable products (textile-related) from the scope.

One stakeholder indicated that diapers are included within textiles but only referring to technical requirements but not to fitness for use.

Another stakeholder reinforced this message, as a reusable textile nappy could pass the compositional criteria but not perform well (since no fit-for-use assessment is made).

Finally, one stakeholder argued that the Circular Economy Action Plan supports reusable products and requested their inclusion, or at least a mention in the commission decision referring to this and the EU Ecolabel for textiles as reference for manufacturers. Additionally, it welcomed criteria inclusion on durability and performance of reusable products.

JRC agreed on the circularity of these types of products but argued that textile reusable products cannot be included in the scope of the EU Ecolabel for AHP. The main reasons are: (a) the technical properties differ; (b) there is a specific product group for this; (c) it would require a third Life Cycle Assessment (LCA). Additionally, whilst not in position to confirm it, the Textile product group is expected to be revised soon, thus this feedback would fit better there.

### *Criterion 1 removal*

A stakeholder was not in agreement with the removal of Criterion 1 and urged to include it separately and not as part of the Assessment and Verification (A&V) section. It indicated that list/bill of materials was required and as PASS/FAIL criterion. Another stakeholder supported this claim, indicating it was relevant. JRC proposed to provide an Excel sheet to be filled at the application stage, where information related to former Criterion 1 (now removed) could be entered.

## Criterion 1- Fluff pulp

### *1.1 Sourcing of fluff pulp*

Two stakeholders supported the 70% proposal for wood material covered by Sustainable Forest Management (SFM) certificates but as a minimum, suggesting raising the ambition level to 100%. In their opinion, it was feasible and desirable given the EU Ecolabel aspiration for environmental excellence. JRC argued that the 70% was a compromise between environmental ambition and market feasibility and pointed to the fact that the minimum SFM percentages was increased significantly from the 25% of current EU Ecolabel criteria in force. The same stakeholder reinforced its position and indicated that market feasibility increases faster than the EU Ecolabel level of ambition.

A stakeholder indicated that the wording of the criterion was not clear, potentially hindering its understanding. JRC mentioned that it is possible for stakeholders to propose wording suggestions as input for consideration for JRC work. Additionally, clarifications could be added to the user manual that will be made available with the publication of the new EU Ecolabel criteria.

### *1.2 Bleaching of fluff pulp*

Two stakeholders supported the proposed limit for AOX emissions. One stakeholder indicated that most fluff pulp producer worldwide use a kraft process, with increasing presence of ECF technology. This fact was seconded by another stakeholder. Also, if the European average was 0.10 kg/ADt, then this should be the lowest value considered for environmental labelling. JRC clarified that in the BREF document consulted the average was 0.13 kg/ADt.

To the best of one stakeholder knowledge, research has not proven ecosystem benefits of excessive lowering of AOX limits. Contrastingly, another stakeholder replied mentioning a report from 1999 studying ECF & TCF effluents, showing significant toxicity for aquatic environments.

Finally, one stakeholder suggested to perhaps consider brightness as an alternative to AOX measurement.

### *1.3 Emissions of COD and P to water and of S and NOx to air*

Three stakeholders supported Loblolly pine exemption from the P-limit, one of which also supported Eucalyptus. JRC thanked these contributions and invited the stakeholder to share research/facts supporting this proposal.

Two stakeholders highlighted the relevance of harmonizing with US Test methods. Additionally, it was suggested to harmonise the criteria with other Ecolabels (Nordic Swan, Blue Angel; for example, S-threshold = 0.6 kg/ADt)

With respect to the footnote present in the criterion to give the possibility to subtract P naturally contained in the wood, one stakeholder mentioned that in Nordic Swan (Basic Module of the Nordic Swan criteria for Paper Products) it is said: "The values of the raw water can be subtracted when calculating the result. Raw water is water that is taken into the factory from the outside environment". This text is valid for P, COD and AOX emissions.

Other comments from different stakeholders pointed to:

- Introducing exemptions based on different species and/or criteria might impair whole system acceptance and usage.
- If using the wording "*wood raw material*" instead of "*fluff fibres*" would include Eucalyptus and Bamboo as "wood"
- A typo in Table 8 (page 62, COD & P emissions to water for NSSC swapped).
- Support for the use of country specific grid values.
- Introducing a P exemption not only for Loblolly pine, but for "Southern pine" in general (including Loblolly pine), since Loblolly pine is the primary species used in fluff pulp production in the US but a variety of Southern pine pulp species are pulped at US mills to produce fluff pulp.

JRC thanked the contributions made and indicated that it will try to do further research/discussion (if needed) regarding the individual values of the emissions.

### *1.4 Emissions of CO<sub>2</sub>*

Two stakeholders urged to link this criterion with energy consumption/production for full accountability of environmental performance. Likewise, they indicated a strong concern on the deduction of CO<sub>2</sub> emissions from electricity produced in nuclear power plants. As currently formulated, it could be understood as the EU Ecolabel is supporting electricity generation from nuclear plants. Another stakeholder suggested as a compromise to use EU average plus proving action on reducing CO<sub>2</sub> emissions. JRC clarified that the aim was not to promote whatsoever power generation from nuclear plants. The intention was just to clarify that this technology has no CO<sub>2</sub> emissions. Regarding the electricity purchased from the grid, we would need to delete references to national inventories.

Another stakeholder indicated that a set value for CO<sub>2</sub> emission as EU average cannot be accepted, proposing using country specific ones. JRC described the background of this choice, namely being a compromise between those with lower values (keen to use national levels) and those with higher emission values.

Finally, another stakeholder mentioned that Nordic Swan was open for the use of certified, renewable electricity allowing lower CO<sub>2</sub> emission values (376 g CO<sub>2</sub>/kWh).

<b>COFEE BREAK (15 MIN)</b>
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Criterion 2- Man-made cellulose fibres (including viscose, modal, lyocell, cupro, triacetate)

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

The majority of the stakeholders intervening supported requiring 70% of wood material used for the production of dissolving wood pulp to be covered by Sustainable Forest Management (SFM) certificates, thus aligning with the sourcing of fluff pulp sub-criterion.

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

JRC highlighted the difficulty to some MMCF industries to obtain both AOX and OCI values to fulfil criterion 2.2 and requested further inputs from key stakeholders in this respect. It was explained that the pulp producers are not always able to share the AOX value but MMCF producers can measure OCI in the finished fibres. Another stakeholder posed the question on how it is possible to know whether some producers follow BREF if they cannot measure AOX. JRC explained that they could measure AOX but do not supply the value due to confidentiality issues. A stakeholder highlighted that the type of information requested must be available, especially to Competent Bodies upon which consumers deposit their trust for environmental performance even if confidential data are provided.

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

JRC requested stakeholders to provide input on adequacy of new set of requirements for sub-criterion 2.3. However, no comments were received on this sub-criterion during the meeting.

Criterion 3- Cotton and other natural cellulosic seed fibres

No comments were received on this sub-criterion.

Criterion 4- Synthetic polymers and plastic materials

*4.1 Production of synthetic polymers and plastic materials*

One stakeholder indicated that manufacturers often explain that they do not use water in the production of plastic materials. Another stakeholder clarified that the CEN/TS 16137 had been withdrawn, proposing EN 16640 (for bio-based carbon content) or EN 16785 (for bio-based content and H, N, O) as alternatives.

It was also explained that indicators for improvement can be used in relation to water, waste and energy optimisation.

*4.2 Bio-based plastic materials*

There was a consensus amongst stakeholders on making this criterion voluntary. Some concerns were:

- *Sustainability (environmental detrimental impacts):*

Several stakeholders highlighted that switching to bio-based does not equal to a greater sustainability. They emphasised impacts (as land use change) and advocated for more holistic approaches/tools (LCA). Also, one stakeholder highlighted the lack of certification or criteria at EU level on the sustainability of bio-based plastics. It is suggested that schemes for sustainability (in relation to their specific criteria and in general to their reliability) shall be explored as references.

- *Market inability to meet targets:*

One stakeholder affirmed that industry will not be able to maintain a fixed percentage of bio-based materials to be used in AHP.

- *Potential lack of traceability/accountability:*

One stakeholder asked if mass-balance approach was admissible (in relation to the assessment and verification). Another stakeholder warned that some products claiming to contain bio-based plastic might contain fossil fuels. Another stakeholder opposed firmly to this approach for in favour of traceability.

In a separate note, a stakeholder mentioned that CEN/TS 16137 has been withdrawn and for so bio-based carbon content could be determined in line with EN 16640 or even refer to bio-based content according to EN 16785 (also looking at H,N,O). Also pointed that current agricultural area used to grow feedstock for bio-based plastics is ca. 700,000 ha (0.02% of global).

A stakeholder pointed about the benefit when the bio-based product is incinerated at the end of life (which is often the case). However LCA may not be the right tool to cover this advantage completely and not the right method to compare bio-based with fossil-based products. Bio-based PE (not mass balanced) has been in the market for a long time and shows clear benefits regarding its carbon footprint. Also PLA is a bio-based material, industrial compostable as well, but most important it is 100% bio-based and additionally mechanically and also chemically recyclable. This and the many opportunities provided by the various bio-based plastic materials is unfortunately not considered in the current report.

JRC acknowledged the usefulness of the comments made and explained that a greater sustainability of bio-based plastics cannot be assumed. It was remarked that in other ecolabels type I (such as Nordic Swan and Blue Angel), the requirement on bio-based plastic is voluntary.

#### Criterion 5- Biodegradability

The majority of the stakeholders intervening were against the introduction of this criterion. The main arguments were:

- *Lack of legislation/regulation and waste management systems across all MS:*

Two stakeholders affirmed that the most of MS do not count with a legislation allowing AHP in composting or recycling plants or even with the waste management system infrastructure to channel and treat AHP appropriately. In this case, AHP are just landfilled.

- *Potential misleading effect on consumers perception:*

By mentioning AHP products are biodegradable, consumers might perceive that they would naturally degrade in the environment and/or that they can be composted. Since no prior separation of non-biodegradable parts would occur, this would incur into detrimental impacts.

Finally, one stakeholder indicated that the listed ISO standards are test methods without pass or fail criteria; suggesting referring to the specifications of these criteria (EN 13432/14995 or ISO 17088/18606). The applicability of industrially compostable products in closed loop systems could also be taken into account (lower scale and not extended to all MS though).

JRC thanked the comments made, acknowledged that potential benefits might be easily hindered and indicated that comments would be considered for the next proposal.

#### Criterion 6- Material efficiency in the manufacturing

It is to be highlighted that no comments were received to this criterion during and after the first AHWG meeting, only the thresholds were proposed to be stricter than the current criterion in place (from 2014). Some comments were made by stakeholders on this occasion.

One stakeholder asked the reasons to have incineration in the same target level as recycling and reuse (in reference to the waste management hierarchy). Another stakeholder mentioned that incineration with recovery was a better option than landfill. Finally, another stakeholder suggested to revise the reference to the standard ISO 14025 as it is not related to waste production reporting.

JRC replied that in this criterion the target is the percentage of waste, either sent to landfill or incineration, but not recovered for reuse, recycling or energy production. So the percentage of waste to report in this criterion is the amount not reused in the plant by any means. It was also mentioned by JRC whether it would be possible to introduce one target for recycling + reuse. Also, further clarity on the nature of the waste might be required in order to make accurate targeting on recycling/reuse rates.

## Criterion 7- Excluded and restricted substances

### *7.1 Restrictions based on CLP Regulation and 7.2 Substances of very high concern*

Regarding testing and analytical methods, one stakeholder indicated that LOD depends on equipment used while LOQ depends on the method, thus inquiring about how  $LOQ = 3 \cdot LOD$  had been determined. Also, it was mentioned that the correct wording was “There are no harmonised standards for the analytical methods”.

One stakeholder indicated that it is not clear why a certain presence of impurities is allowed. Another stakeholder inquired whether the aim was for final products to be tested for impurities. Another stakeholder confirmed the presence of impurities and supported (indicated it was clear) the inclusion of such wording.

With respect to the assessment and verification, one stakeholder supported the evidences to be provided by anyone within the applicant’s supply chain. Another stakeholder had concerns about the feasibility of certifying and taking responsibility for declaring a 0.01% (ten times lower than REACH requirements). Finally, several exchanges were made with another stakeholder, which suggested to have criterions 7.1 & 7.2 as they are (referred to articles with % thresholds) but having a separate criterion referred to chemicals. Documentation on criteria 7.1 & 7.2 would be by the producer and of the components, as supplied in the bills of materials. Then, for chemicals, the supplier of the chemical could provide the documentation on these. In this way you would avoid comparing the same limits as in articles. A stakeholder inquired why there was a differentiation between health and environmental hazard, as opposed to other ecolabels type I.

JRC thanked the comments and made some clarifications. About LOD/LOQ, it agreed on the comments made but indicated that the ECHA’s recommendation for having  $LOQ = 3 \cdot LOD$  was a generic one. JRC also clarified the definition of impurity. Also, JRC indicated its efforts in aligning with other EU Ecolabel Product Groups. Regarding the 0.01% threshold for substances with H classes hazardous to the aquatic environment and hazardous to the ozone, JRC clarified that this was proposed as a compromise between the environmental ambition and the burden for industry, also considering that those H classes should not be too relevant for this product group. Finally, on assessment and verification, JRC clarified that declarations are needed from the applicant and from the suppliers. In the user manual, a clarification of which information shall come from whom will be added.

## LUNCH BREAK (1 HOUR)

### *7.3 Other specific restrictions*

#### *7.3.a Other specific restrictions – SPECIFIED EXCLUDED SUBSTANCES*

A stakeholder opposed to the proposed restriction on phthalates, adducing the diversity of this chemical group and the lack of justification in the JRC report for this exclusion, including not finding

the list of phthalates excluded for their potential as endocrine disruptors. The stakeholder proposed to limit the exclusion to those phthalates included in REACH annexes 14 & 17.

A stakeholder did not object for all types of phthalates to be excluded, as did Nordic Swan.

JRC offered to share the list of priority of phthalates with potential endocrine disruptive properties. Additionally, it affirmed that this ban was consistent with the EU Chemical Strategy for sustainability. The stakeholder highlighted the consolidation of REACH versus other schemes (Chemical strategy) and the lack of full assessments to add certainty and back up the ban. Additionally, it reiterated that it was not possible to find the official EU list mentioned by the JRC. In reply, JRC stated that it did not assess all phthalates and also that this would not be possible. Hence and in line with the precautionary approach of the EU Ecolabel, it was decided to exclude the whole family of these chemicals, which is also in line with other ecolabels type I. In any case, if there is a phthalate used in AHP that cannot be substituted, a derogation request could be considered.

A stakeholder proposed that only chemicals that have a function should be included and not all chemicals. Additionally, it was suggested to put the "Assessment and Verification" section just after each requirement. Finally, the stakeholder pointed to some potential mistakes related to footnotes 2 and 3 in criterion 7.3.a.

One stakeholder raised a comment on whether viscose was a polymer or not.

The comment on viscose was not followed during the meeting. Viscose is a natural polymer in fact is a fibre made of cellulose from wood raw materials or cotton. It is one of the man-made cellulose fibres addressed in criterion 2.

#### *7.3.b Other specific restrictions - FRAGRANCES*

One stakeholder wondered whether it would be beneficial to remove all odour control substance, since this could lead to less environmental impacts and chemicals added to the final product. This was supported by another stakeholder.

#### *7.3.c Other specific restrictions - LOTIONS*

One stakeholder supported the exclusion of lotions.

#### *7.3.d Other specific restrictions – INKS & DYES*

No comments from stakeholders on this aspect.

#### *7.3.e Other specific restrictions - FURTHER RESTRICTION APPLICABLE TO PLASTIC MATERIALS*

No comments from stakeholders on this aspect.

#### *7.3.f Other specific restrictions – FURTHER RESTRICTION TO ADHESIVES*

No comments from stakeholders on this aspect.

#### *7.3.g Other specific restrictions – SUPERABSORBENT POLYMERS (SAP)*

No comments from stakeholders on this aspect.

#### *7.3.h Other specific restrictions - SILICONE*

No comments from stakeholders on this aspect.

### 7.3.i Other specific restrictions – IMPURITIES OF CONCERN

A stakeholder thanked the inclusion of this sub-criterion as consumers organizations do regular test and have found some substances/impurities in products.

#### Criterion 8- Packaging

Most of the stakeholders intervening (4) affirmed the proposed targets were too ambitious and likely not achievable. Main constraints supporting this were availability of raw material, compromise of product technical properties (thus potentially affecting consumer's acceptance) and lack of clarity on meaning of recycled content/recyclability. The INGEDE method was suggested for recyclability.

JRC mentioned that, for example for graphic/tissue paper EU Ecolabel, the manufacturing process is batches, meaning different batches might contain slightly different composition.

A stakeholder highlighted that the function of the applicator is aiding in placing the tampon, thus not being considered as packaging.

JRC acknowledged that the recycled and recyclable percentages proposed might be high, however relevant data to set them up were not available. In relation to recyclability, the testing aims to understand if the packaging can be further recycled. Based on recent exchanges, JRC is considering whether it should be a pass/fail criterion. A clarification on post-consumer recycled material was made.

## COFEE BREAK (15 MIN)

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

No comments were received in relation to this criterion.

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

A stakeholder highlighted the absence of harmonised tests for in user tests such as absorption and leakage protection. It was also mentioned that, since results are dependent on the test method used, standardisation is required to have accurate understanding on whether a product meets the requirement.

JRC acknowledged the absence of harmonised test methods with few exceptions. JRC proposed to follow up with industry producers to check whether there are specific testing methods that could be added to the criterion guidelines.

#### Criterion 11- Social Responsibility with regard to Labour Aspects

One stakeholder pointed towards the social criterion from the EU Ecolabel for Electronic Displays which was more recent. Another stakeholder agreed and provided detailed and specific proposals:

- Enriching the list of supplementary provisions with additional ILO conventions (as the criterion is restricted to social and labour rights).
- Expanding the application of the criterion to go beyond to the assembly site, up to tier II & III in the manufacturing plants (lower tiers of the value chain).
- Inclusion of "unannounced" inspections (site visits) to be carried out by evaluators, especially in locations where the application of ILO conventions cannot be meet by national laws. Another stakeholder supported previous consideration and further clarified:
- The criterion should be defined in such a way that is also applying a risk-based approach eventually for due diligence. Based on the legislative development regarding the due diligence and taxonomy, these criteria relate to the integration of social aspects as a minimum social

safety net for activities to qualify as taxonomy eligible. It is important to use a proper wording, expanding the proposed scope to address social organizations criticisms (i.e. limiting the scope to assembly plants).

- The EU Ecolabel for electronic displays delve further into social aspects, such as minimum living wage, because more in-depth discussion and focus were carried out when the label was being developed. Happy to discuss further in bilateral meetings.

A stakeholder supported having a working group in this regard.

JRC clarified that footwear EU Ecolabel social criterion was used preferentially over the electronic displays one since it seemed more comprehensive. Concerning the suggested expansion of the application of this criterion, JRC will need to internally discuss about it. The feedback from Competent Bodies after the first AHWG meeting was that this criterion shall only refer to the final AHP assembly site.

Criterion 12- Information appearing on the EU Ecolabel

No comments were received in relation to this criterion.

Next steps

*The JRC thanked the participants for their time and contributions and explained next steps:*

- Stakeholders can provide comments on technical report and criteria proposals not later than 20<sup>th</sup> June 2022.
- Comments need to be submitted to the JRC either using the Word template provided or by using the BATIS system. JRC to publish the presentation used during the day as soon as possible.
- October 2022: TR3.0 publication and launch of third (and last) stakeholder consultation.

Note to readers

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

- Presentation was made available via BATIS or website <https://susproc.jrc.ec.europa.eu/product-bureau/product-groups/415/documents>.
- Information on deadline for comments (20<sup>th</sup> June 2022) was reminded.

END OF DAY 1 (AHP)