

# Assessment of the EU Ecolabel criteria for printed paper, stationery paper, and paper carrier bag products

*Commission Decision (EU) 2020/1803*

Fields marked with \* are mandatory.

## **Aim of the survey**

The Joint Research Centre of the European Commission is collecting evidence about the suitability and relevance of the existing EU Ecolabel criteria for the product group 'printed paper, stationery paper, and paper carrier bag products', established in [Commission Decision \(EU\) 2020/1803](#).

## **Structure of the survey**

The survey is made up of the following sections:

1. Respondent details
2. General topics
3. Printed paper, stationery paper, and paper carrier bag products product group

## **Confidentiality of data and information provided**

Data and information provided via this questionnaire will be treated confidentially and in compliance with the General Data Protection Regulation ([Regulation 2016/679](#)). Therefore, data will be treated only within the development of the project described above and for the exclusive use of the European Commission.

The European Commission will process data and information in compliance with [Regulation 2018/1725](#). For more information, please visit [this link](#).

## **Note**

All questions are numbered, but not all of them will be available to all the participants to the questionnaire. Specific questions are available only to participants providing specific answers.

## **1. Respondent details**

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### 1.1. Details

Please, fill out the table below

	<b>First name</b> (e.g. Saverio)	<b>Last name</b> (e.g. Bitte)	<b>Organisation name</b> (e.g. PaperCompanyX)	<b>Organisation website</b> (e.g. papercompanyx.com)	<b>Email address</b> (e.g. saverio.bitte@papercompanyx.com)
1 *					

I hereby consent to the European Commission processing and collecting my personal data. I am aware that I can exercise my personal data rights by contacting the European Commission via the functional mailbox [JRC-B5-PRODUCT-BUREAU@ec.europa.eu](mailto:JRC-B5-PRODUCT-BUREAU@ec.europa.eu) and specifying that data were collected in this specific questionnaire.

## 1.2. Type of respondent

Which of the following options best represents your type of organisation/institution/interests?

- University or research institute
- Certified laboratory
- Competent body
- Government (local, regional, or national), different from a competent body
- Non-governmental organisation - Environment
- Non-governmental organisation - Consumers
- Industry
- Industry association
- Other

If "Other", please specify

*50 character(s) maximum*

### 1.2.1. Size of the company

In 1.2., you have selected "Industry". What is the size of your company?

- micro enterprise: self-employed
- micro enterprise: fewer than 10 persons employed
- small enterprise: 10 to 49 persons employed
- medium-size enterprise: 50 to 249 persons employed
- large enterprise: 250 or more persons employed

### 1.2.2. Holder of a licence for environmental labels

In 1.2., you have selected "Industry". Does your company hold the licence for environmental labels, such as EU Ecolabel, Blue Angel – The German Ecolabel, Nordic Swan Ecolabel, etc.?

- Yes
- No

If "Yes", please specify the environmental label and the type of products awarded by the environmental label, e.g. EU Ecolabel for printed paper, stationary paper and paper carrier bag products.

*500 character(s) maximum*

## 2. General topics

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### 2.1. Choice of the environmental label

In 1.2.2., you declared that your company holds a licence for environmental labels. Why did your company apply for it? And why for that specific environmental label?

*500 character(s) maximum*

### 2.2. EU Ecolabel process

Have you ever addressed/analysed/experienced the application process of the EU Ecolabel?

- Yes  
 No

If "Yes", what do you think in general about it? Additionally, where is the highest investment of resources, e.g. time of the personnel, testing requirements, contact supply chain, other resources?

*500 character(s) maximum*

### 2.3. Difficulties addressed by the EU Ecolabel applicant

In 1.2., you declared yourself to be a "Competent body".

Report the difficulties encountered by applicants when interpreting the criteria and going through the entire certification process.

*500 character(s) maximum*

### 2.4. Boosting the number of EU Ecolabel licences/products

What do you think could increase the number of licences/products within the product group addressed in Commission Decision (EU) 2020/1803?

Please specify any action you would recommend.

*500 character(s) maximum*

### 2.5. Room for improvement

Overall, what would you improve about the current EU Ecolabel criteria for the product group addressed in Commission Decision (EU) 2020/1803? For example, do you think new

requirements should be added or that any current requirement is redundant? Please report the reasons for your proposal.

*500 character(s) maximum*

### 3. Product group ‘Printed paper, stationery paper, and paper carrier bag products’

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#### 3.1. Scope of the product group ‘printed paper, stationery paper, and paper carrier bag products’

Select one option to show or hide the original text from the legal text.

- Show
- Hide

The product group ‘printed paper, stationery paper, and paper carrier bag products’ shall comprise the following products:

(a) printed paper products that consist of at least 90 % by weight of paper, paperboard or paper-based substrates, except for books, catalogues, booklets or forms that shall consist of at least 80 % by weight of paper or paperboard or paper-based substrates. Inserts, covers and any printed paper parts of the final product shall be considered to form part of the product except for non-fixed inserts (such as flyers, removable stickers) that are sold or provided with printed paper products. If the EU Ecolabel is intended to be placed on non-fixed inserts, they shall fulfil the requirements of the Annex to this Decision. Fixed inserts to the printed paper product (not intended to be removed) shall fulfil the requirements of the Annex to this Decision;

(b) envelopes that consist of at least 90 % by weight of paper, paperboard or paper-based substrates;

(c) paper carrier bags, including wrapping paper, that consist of 100 % by weight of paper, paperboard or paper-based substrates;

(d) stationery paper products, including filing products, that consist of at least 70 % by weight of paper, paperboard or paper based substrates, except for suspension files and folders with metal fastener to which the threshold does not apply.

For products referred to in point (a) of paragraph 1 that shall consist of at least 80 % by weight of paper or paperboard or paper-based substrates and for products referred to in point (d) of paragraph 1, the plastic component cannot exceed 10 % by weight, except for ring binders, exercise books, notebooks, diaries, and lever arch files where the plastic weight cannot exceed 13 %.

The metal weight cannot exceed 30 g per product, except for suspension files, folders with metal fasteners, ring binders and lever arch files having a filing capacity of up to 225 sheets where it can be up to 75 g and except for lever arch files having a filing capacity of more than 225 sheets, where it can be up to 170 g.

The product group 'printed paper, stationery paper, and paper carrier bag products' shall not include the following products or materials:

(a) packaging and elements adhered to packaging such as labels (with the exception of paper carrier bags and wrapping paper);

(b) corrugated board;

(c) food contact materials and articles intended to come into contact with food that constitutes the subject matter of article 1 of Regulation (EC) No 1935/2004 of the European Parliament and of the Council (8);

(d) products falling within the product group 'tissue paper and tissue products' as defined by Article 2 in Commission Decision (EU) 2019/70 (9);

(e) fragranced printed paper products, fragranced stationery paper products, and fragranced carrier bags;

(f) polyvinyl chloride (PVC)

(8) Regulation (EC) No 1935/2004 of the European Parliament and of the Council of 27 October 2004 on materials and articles intended to come into contact with food and repealing Directives 80/590/EEC and 89/109/EEC (OJ L 338, 13.11.2004, p.4).

(9) Commission Decision (EU) 2019/70 of 11 January 2019 establishing the EU Ecolabel criteria for graphic paper and the EU Ecolabel criteria for tissue paper and tissue (OJ L 15, 17.1.2019, p.27)

Do you think that the scope of the product group 'printed paper, stationery paper, and paper carrier bag products' should be changed?

- Yes
- No
- No opinion

Please provide justification for your answer

*500 character(s) maximum*

### 3.2. Definitions applicable to the purpose of Commission Decision (EU) 2020/1803

Select one option to show or hide the original text from the legal text

- Show
- Hide

(1) 'binders' means paper-based products used for storing of documents or magazines and consisting of a cover, usually made of board, with rings for holding loose papers together, including ring binders and lever arch files;

(2) 'books' means yarn-bound or adhesive-bound printed paper products with hard or soft covers, not including annual reports, journals, brochures, magazines, and catalogues published on a regular basis;

(3) 'filing products' mean product used for organization, storage and protection of paper documents, including suspension files and lever arch files;

(4) 'folder' means a folding case or cover used for storage of loose papers including products including indices and dividers, document wallets, square cut folders, suspension files, cardboard boxes and 3-flap folders;

(5) 'insert' means an extra leaf or section, printed independently from the printed paper product which is either placed within the pages of a printed paper product and may be removed (non-fixed insert) or bound into the pages of the printed paper product and thus form an integral part thereof (fixed insert) including multipage advertisements, booklets, brochures, reply cards, or other promotional materials;

(6) 'packaging' means all products made of any material of any nature to be used for the containment, protection, handling, delivery or presentation of goods, from raw materials to processed goods, from the producer to the user or the consumer;

(7) 'paper carrier bags' mean paper-based products used for the handling or transportation of goods.

(8) 'printed paper product' means product bearing the printed image resulting from the processing of a printing material printed onto paper and including finishing.

(9) 'stationery paper products' mean writing and filing materials made of paper, including envelopes and office materials;

(10) 'wrapping paper' means a paper sheet or roll used for wrapping items such as gifts and parcels;

Do you think that any of the definitions should be changed?

- Yes
- No
- No opinion

Please provide justification for your answer

*500 character(s) maximum*

### 3.3. Aims of the criteria for 'printed paper, stationery paper, and paper carrier bag products'

Select one option to show or hide the original text from the legal text

- Show
- Hide

The EU Ecolabel criteria target the best printed paper, stationery paper and paper carrier bag products on the market, in terms of environmental performance. The criteria focus on the main environmental impacts associated with the life cycle of these products and promote circular economy aspects.

In particular, the criteria aim to promote products that use high contents of sustainable or recycled fibres, are recyclable, are associated with low emissions and which may only contain a limited amount of hazardous substances.

To this end the criteria:

- require that the paper substrate, including paper board, is EU Ecolabel certified;
- set strict limits on the use of hazardous substances;
- set requirements to guarantee the product recyclability and a proper waste management system including limits on the maximum amount of paper waste produced;
- set requirements on emissions, particularly on the reduction of VOCs emissions to help guarantee associated benefits for worker health and for reductions in local and regional atmospheric pollution;
- set requirements on energy consumption at the production site.

The criteria for awarding the EU Ecolabel to 'printed paper, stationery paper, and paper carrier bag products' are as follows:

1. Substrate;
2. Restricted substances:
  - 2.1. Restrictions on Substances of Very High Concern (SVHCs);
  - 2.2. Restrictions on substances classified under Regulation (EC) No 1272/2008 of the European Parliament and of the Council <sup>(1)</sup>;
  - 2.3. Biocidal products and biocidal active substances;
  - 2.4. Cleaning agents;
  - 2.5. Alkyl phenol ethoxylates, halogenated solvents and phthalates;
  - 2.6. Further restrictions applying to printing inks, toners and varnishes;
  - 2.7. Toluene recovery from rotogravure printing;
3. Recyclability:
  - 3.1. Removability of non-paper parts;
  - 3.2. Repulpability;
  - 3.3. Adhesives removability;



3.4. Deinkability;

4. Emissions:

4.1. Emissions to water from rotogravure printing;

4.2. Emission from installations covered by Directive 2010/75/EU of the European Parliament and of the Council (2) or equivalent installations;

4.3. VOCs emission from printing processes not covered by Directive 2010/75/EU of the European Parliament and of the Council;

5. Waste:

5.1. Waste management system;

5.2. Paper for recycling from printing facilities;

5.3. Paper for recycling from stationery paper product and carrier bags production sites;

6. Energy use;

7. Training;

8. Fitness for use;

9. Information on the product;

10. Information appearing on the EU Ecolabel.

The ecological criteria cover the manufacturing of printed paper, stationery paper, and paper carrier bag products, including constituent sub-processes, from the paper production to the site(s) and dedicated production lines where the printed paper, stationery paper and paper carrier bag products are printed and /or converted. The ecological criteria do not cover the transport and packaging.

All printing or converting operations applied to the printed paper, stationery paper and paper carrier bag products shall fulfil the respective requirements. Parts of the final product that are printed or converted by a sub-contractor shall also fulfil the related requirements. The application shall include a list of all the printing houses and subcontractors involved in the production of the product, and their geographic locations.

An application can be submitted for a product line of specified type such as e.g. glued brochure of 2 to 30 pages. In this case, the sample product that represents the product line needs to fulfil the criteria. The sample product must be analysed in reference to all materials and chemicals used, types of paper, the maximum number of pages, the maximum format and all possible types of binding. The EU Ecolabel can be used for all subsequent products that comply with the defined criteria for the sample product.

Changes in suppliers, production sites and production process, 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. For a product type manufactured on a recurring basis or a product type that will only be manufactured once, the application shall address the specific product.

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

(2) Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control) (OJ L 334, 17.12.2010, p. 17)

Do you think that the aims of the criteria for the product group 'printed paper, stationery paper, and paper carrier bag products' should be changed?

- Yes
- No
- No opinion

Please provide justification for your answer

*500 character(s) maximum*

### **3.4. General assessment and verification for 'printed paper, stationery paper, and paper carrier bag products'**

Select one option to show or hide the original text from the legal text.

- Show
- Hide

The 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 his supplier(s) and/or their supplier(s), etc. 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 or site inspections to check compliance with these criteria.

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 a prerequisite the printed paper, stationery paper and paper carrier bag product(s) shall meet all applicable legal requirements of the country or countries in which the product is placed on the market. The applicant shall declare the product's compliance with this requirement.

Do you think that the general assessment and verification for the product group 'printed paper, stationery paper, and paper carrier bag products' should be changed?

- Yes
- No
- No opinion

Please provide justification for your answer

*500 character(s) maximum*

### **3.5. Definitions applicable to the product group 'printed paper, stationery paper, and paper carrier bag products'**

Select one option to show or hide the original text from the legal text.

- Show
- Hide

(1) 'adhesive application' refers to processed adhesives used in finished paper products (typically applied as films);

(2) 'cleaning agents' means the following: (a) liquid chemicals used to wash printing forms, both separate (off-press) and integrated (in-press), and printing presses to remove printing inks, paper dust and similar products; (b) cleaners for finishing machines and printing machines, such as cleaners to remove adhesive and varnish residues; (c) printing inks removers used in washing off dried printing inks; not including cleaning agents for cleaning other parts of the printing machine or for cleaning other machines than printing machines and finishing machines;

(3) 'converting process' means a process whereby a material is processed into a converted paper product, including sometimes a printing process (pre-press, press, and post-press operations);

(4) 'converted paper product' is a paper, board or paper-based substrate, either printed or unprinted, generally used to protect, handle or store items or notes, for which the converting process is an essential part of the production process, comprising three main categories of products: envelopes, paper carrier bags and stationery paper products;

(5) 'flexography' means a printing activity using an image carrier of rubber or elastic photopolymers on

which the printing areas are above the non-printing areas, using liquid inks which dry through evaporation;

(6) 'fugitive emissions' means any emissions not in waste gases of volatile organic compounds into air, soil and water as well as solvents contained in any products, unless otherwise stated in Part 2 of Annex VII of Directive 2010/75/EU;

(7) 'halogenated organic solvent' means an organic solvent which contains at least one atom of bromine, chlorine, fluorine or iodine per molecule;

(8) 'heatset web offset' means a web-fed printing activity using an image carrier in which the printing and non-printing area are in the same plane, where web-fed means that the material to be printed is fed to the machine from a reel as distinct from separate sheets;

(9) 'laminating' means adhering together of two or more flexible materials to produce laminates;

(10) 'paper for recycling' means paper waste stream generated during the production of finished product;

(11) 'pressure-sensitive adhesive coatings' (PSA): means adhesives with still mobile molecules on their surfaces that, even after setting, can produce sufficient adhesion by pressing their cohesive films (coating) against the surface to be bonded;

(12) 'publication rotogravure' means a rotogravure printing activity used for printing paper for magazines, brochures, catalogues or similar products, using toluene-based inks;

(13) 'repulping' means conversion of paper back into pulp;

(14) 'rotary screen printing' means a web-fed printing activity in which the ink is passed onto the surface to be printed by forcing it through a porous image carrier, in which the printing area is open and the non-printing area is sealed off, using liquid inks which dry only through evaporation.

(15) 'rotogravure' means a printing activity using a cylindrical image carrier in which the printing area is below the non-printing area, using liquid inks, which dry through evaporation.

(16) 'TVOC' means total volatile organic carbon, expressed as C (in air).

(17) 'web-fed' means that the material to be printed is fed into the machine from a reel as distinct from separate sheets;

(18) 'varnishing' means an activity by which a varnish or an adhesive coating for the purpose of later sealing the packaging material is applied to a flexible material;

(19) 'volatile organic compounds' (VOC) means any organic compound as well as the fraction of creosote, having at 293,15 K a vapour pressure of 0,01 kPa or more, or having a corresponding volatility under the particular conditions of use;

Do you think that the definitions applicable to the product group 'printed paper, stationery paper, and paper carrier bag products' should be changed?

- Yes
- No
- No opinion

Please provide justification for your answer

*500 character(s) maximum*

### 3.6. Criterion 1 - Substrate

Select one option to show or hide the original text from the legal text.

- Show
- Hide

The paper substrate, including paperboard used in a final product shall bear the EU Ecolabel for 'Graphic paper' in accordance with Annex I to Commission Decision (EU) 2019/70 (3).

Assessment and verification: the applicant shall provide a copy of a valid EU Ecolabel certificate according to Annex I to Commission Decision (EU) 2019/70 for each paper substrate used in EU Ecolabel printed paper, stationery paper or paper carrier bag product(s). The applicant shall provide the description of the EU Ecolabel substrate(s), including the trade names and amounts of paper used. The list shall also include the names of the suppliers of the papers used.

(3) Commission Decision (EU) 2019/70 of 11 January 2019 establishing the EU Ecolabel criteria for graphic paper and the EU Ecolabel criteria for tissue paper and tissue products (notified under document C(2019) 3) (OJ L15, 17.1.2019, p. 27).

Do you think that 'criterion 1 - Substrate' should be changed?

- Yes
- No
- No opinion

Please provide justification for your answer

*500 character(s) maximum*

### 3.7. Criterion 2 - Restricted substances

Select one option to show or hide the original text from the legal text.

- Show
- Hide

The basis for demonstrating compliance with each of the sub-criteria under criterion 2 shall be the applicant providing a list of all the relevant chemicals used together with appropriate documentation (safety data sheet and/or a declaration from the chemical supplier). As a minimum, all process chemicals used by the applicant in relevant printing or converting processes must be screened.

Do you think that 'criterion 2 - Restricted substances' should be changed?

- Yes
- No
- No opinion

Please provide justification for your answer

*500 character(s) maximum*

### **3.8. Sub-criterion 2.1. Restrictions on Substances of Very High Concern (SVHC)**

Select one option to show or hide the original text from the legal text.

- Show
- Hide

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 stating 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<sup>(4)</sup> 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 used 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](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.

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

Do you think that sub-criterion 2.1 should be changed?

- Yes
- No
- No opinion

Please provide justification for your answer

*500 character(s) maximum*

### **3.9. Sub-criterion 2.2. Restrictions on substances classified under Regulation (EC) No 1272/2008 of the European Parliament and of the Council**

Select one option to show or hide the original text from the legal text.

- Show
- Hide

Unless derogated in Table 1, the 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 sensitiser: H317 (6).

— 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.

Table 1

Derogations to restrictions on substances classified under Regulation (EC) No 1272/2008 and applicable conditions

Substance / mixture type	Applicability	Derogated hazard class, category and hazard statement code	Derogation conditions
Mineral oils and distillates	Heatset, coldset or digitally printed paper products	Aspiration hazard, category 1, H304	The applicant shall demonstrate to the Competent Body that all relevant instructions included in the safety data sheet regarding safe handling and storage and suitable exposure controls and personal protection are in place and declare that these are being complied with.
Nickel	Metal components	Skin sensitization, category 1, H317, Carcinogenicity, category 2, H351, Specific Target Organ Toxicity, repeated exposure, category 1, H372	The applicant must provide information to the consumer regarding the use of nickel for metal electroplating, coating or alloying.

Assessment and verification: the applicant shall provide a list of all relevant chemicals used in their production process, together with the relevant safety data sheet or chemical supplier declaration and any relevant declarations from component article suppliers. Any chemicals containing substances or mixtures with restricted classifications under Regulation (EC) No 1272/2008 shall be highlighted. The approximate dosing rate of the chemical, together with the concentration of the restricted substance or mixture in that chemical (as provided in the Safety Data Sheet or supplier declaration) and an assumed retention factor of 100 %, shall be used to estimate the quantity of the restricted substance or mixture remaining in the final product.

Since multiple products or potential products using the same process chemicals may be covered by one licence, the calculation only needs to be presented for the worst-case product covered by the EU Ecolabel licence (e.g. the most heavily printed product). Justifications for any deviation from retention factor of 100 % (e.g. solvent evaporation) or for chemical modification of a restricted hazardous substance or mixture must be provided in writing to the competent body. For any restricted substances or mixtures that exceed 0,10 % (weight by weight) of the final printed paper, stationery paper or paper bag 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

Do you think that sub-criterion 2.2 should be changed?

- Yes
- No
- No opinion

Please provide justification for your answer

*500 character(s) maximum*

### 3.10. Sub-criterion 2.3. Biocidal products and biocidal active substances

Select one option to show or hide the original text from the legal text.

- Show



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Printed paper, stationery paper and paper carrier bag products shall not be treated with any biocidal products, including those of type 7 (film preservatives) and of type 9 (fibre, leather, rubber and polymerised materials preservatives).

Only in-can preservatives (i.e. biocidal product type 6: preservatives for products during storage) present in printing inks, varnishes, lacquers and any other formulations used during the production processes and preservatives used for liquid cooling and processing systems (i.e. biocidal product type 11) shall be permitted, subject to their:

— having been approved by Regulation (EU) No 528/2012 of the European Parliament and of the Council (7) for product type 6 or product type 11 uses, as appropriate, or

— being under examination pending a decision on approval by Regulation (EU) No 528/2012 for product type 6 or product type 11 uses, as appropriate.

If any biocidal active substance meeting the above condition(s) is assigned the hazard statement code H410 or H411 (hazardous to the aquatic environment, chronic hazards, category 1 or 2), its use shall only be permitted if the bioaccumulation potential (log Pow octanol/water partition coefficient) is < 3,0 or if the bioconcentration factor (BCF) is  $\leq 100$ .

Assessment and verification: the applicant shall declare which biocidal products have been used in the production process, state the nature of the use of the biocidal product (i.e. product type 6 or 11) and provide copies of safety data sheets and any relevant declarations or test reports from the manufacturer of the biocidal products.

(7) Regulation (EU) No 528/2012 of the European Parliament and of the Council of 22 May 2012 concerning the making available on the market and use of biocidal products (OJ L 167, 27.6.2012, p. 1).

Do you think that sub-criterion 2.3 should be changed?

- Yes  
 No  
 No opinion

Please provide justification for your answer

*500 character(s) maximum*

### 3.11. Sub-criterion 2.4. Cleaning agents

Select one option to show or hide the original text from the legal text.

- Show  
 Hide

Cleaning agents used for routine cleaning operations in printing processes and/or sub-processes shall:

- not contain solvents with a flashpoint < 60 °C in concentrations > 0,10 % (by weight);
- not contain benzene in concentrations > 0,10 % (by weight);
- not contain toluene or xylene in concentrations > 1,0 % (by weight);
- not contain aromatic hydrocarbons ( $\geq$  C9) in concentrations > 0,10 % (by weight);
- not contain any ingredients based on halogenated hydrocarbons, terpenes, n-hexane, nonylphenols, N-methyl- 2-pyrrolidone or 2-butoxyethanol in concentrations > 0,10 % (by weight).

These restrictions do not apply to cleaning agents used in special formulations that are only occasionally used, such as dried ink removers and blanket revivers. The restriction on toluene does not apply to cleaning agents used in rotogravure printing processes.

Assessment and verification: the applicant shall declare the different cleaning agents that are used and whether they are used for routine cleaning procedures or for special procedures such as dried ink removal or blanket revival. A safety data sheet shall be provided for each cleaning agent used. For the routinely used cleaning agents, the safety data sheets shall be supported by a declaration of compliance with the relevant restrictions listed above from the supplier of the cleaning agent.

Do you think that sub-criterion 2.4 should be changed?

- Yes
- No
- No opinion

Please provide justification for your answer

*500 character(s) maximum*

### **3.12. Sub-criterion 2.5. Alkyl phenol ethoxylates, halogenated solvents and phthalates**

Select one option to show or hide the original text from the legal text.

- Show
- Hide

The following substances or preparations shall not be present in concentrations exceeding 0,10 % (by weight) in any inks, dyes, toners, adhesives or cleaning agents used in the printing process or related sub-processes to produce the printed paper, stationery paper or paper carrier bag product:

- alkyl phenol ethoxylates and their derivatives that may produce alkyl phenols by degradation;
- halogenated solvents that at the time of application are classified with any of the hazard classes listed in

point 2.2;

— phthalates that at the time of application have been assigned reproductive toxicity hazard classes (category 1A, 1B or 2) and one or more of the following associated hazard statement codes: H360F, H360D, H360FD, H360Fd, H360Df, H361, H361f, H361d, H361fd or H362 in accordance with Regulation (EC) No 1272/2008.

Assessment and verification: the applicant shall provide safety data sheet(s) and a declaration(s) from its chemical supplier(s) demonstrating that APEOs or other alkylphenol derivatives, halogenated solvents or relevant phthalates are not present in these chemicals in quantities exceeding 0,10 % (by weight).

Do you think that sub-criterion 2.5 should be changed?

- Yes  
 No  
 No opinion

Please provide justification for your answer

*500 character(s) maximum*

### **3.13. Sub-criterion 2.6. Further restrictions applying to printing inks, toners and varnishes**

Select one option to show or hide the original text from the legal text.

- Show  
 Hide

Note: for the purpose of this criterion and unless stated otherwise, the restrictions equate to the non-presence of the hazardous substance or mixture in concentrations exceeding 0,10 % (by weight) in the ink, toner or varnish formulation. The following restrictions shall apply to all substances or mixtures used in printing inks, toners and varnishes for use in the printing process or sub-processes used to produce EU Ecolabel printed paper, stationery paper or paper carrier bag products:

— no substances or mixtures with assigned carcinogenic, mutagenic and/or reproductive toxicity hazard classes (category 1A, 1B or 2) and one or more of the following hazard statement codes: H340, H350, H350i, H360, H360F, H360D, H360FD, H360Fd, H360Df, shall be used;

— no substances or mixtures with assigned acute toxicity (oral, dermal, inhalation) hazard classes (category 1 or 2) and one or more of the following hazard statement codes: H300, H310, H330, shall be used;

— no substances or mixtures with assigned acute toxicity (oral, dermal) hazard classes (category 3) and one or more of the following hazard statement codes: H301, H311, shall be used;

— no substances or mixtures with assigned specific target organ toxicity (single or repeated exposure)

hazard classes (category 1) and one or more of the following hazard statement codes: H370, H372, shall be used;

— no pigments or additives based on antimony, arsenic, cadmium, chromium (VI), lead, mercury, selenium, cobalt or any compounds thereof shall be used and only traces of those metals up to 0,010 % (by weight) as impurities shall be permitted.

— no azo dyes, which by reductive cleavage of one or more azo groups may release one or more of the aromatic amines listed in Appendix 8 of entry 43 of Annex XVII to Regulation (EC) No 1907/2006, shall be used (see indicative list in Appendix I to that Annex);

— the following solvents: 2-Methoxyethanol, 2-Ethoxyethanol, 2-Methoxyethyl acetate, 2-Ethoxyethyl acetate, 2- Nitropropane and Methanol shall not be used;

— the following plasticisers: chlorinated naphthalenes, chlorinated paraffins, monocresyl phosphate, tricresyl phosphate and monocresyl diphenyl phosphate shall not be used;

— diaminostilbene and its derivatives, 2,4-Dimethyl-6-tert-butylphenol, 4,4'-Bis(dimethylamino) benzophenone (Michler's Ketone) and Hexachlorocyclohexane shall not be used.

Assessment and verification: the applicant shall provide a list of all the printing inks and related products used in the production of EU Ecolabel printed paper, stationery paper or paper carrier bag products, together with a safety data sheet and declaration of compliance with this criterion for each printing ink, toner and varnish from the supplier/producer of each product.

Do you think that sub-criterion 2.6 should be changed?

- Yes
- No
- No opinion

Please provide justification for your answer

*500 character(s) maximum*

### **3.14. Sub-criterion 2.7. Toluene recovery from rotogravure printing**

Select one option to show or hide the original text from the legal text.

- Show
- Hide

Any rotogravure printing processes used to produce EU Ecolabel printed paper, stationery paper or paper carrier bag products must have a solvent recovery system in place and be able to demonstrate a toluene recovery efficiency of at least 97 %.

Assessment and verification: the applicant shall provide a declaration of compliance with this criterion

supported by a description of the solvent recovery system and a mass balance of toluene that demonstrates a recovery of at least 97 % during the most recent completed calendar year. In case of a new or a rebuilt production plant, the calculations shall be based on at least three months of representative running of the plant.

Do you think that sub-criterion 2.7 should be changed?

- Yes
- No
- No opinion

Please provide justification for your answer

*500 character(s) maximum*

### **3.15. Sub-criterion 3.1. Removability of non-paper parts (in criterion 3 on recyclability)**

Select one option to show or hide the original text from the legal text.

- Show
- Hide

The non-paper parts of stationery paper product such as metal bars or plastic covers shall be easily removable to ensure that those components will not hinder the recycling process. Small non-paper elements such as staples or envelope windows are exempted from this requirement.

Assessment and verification: the applicant shall provide a declaration of compliance with the criterion supported by at least one of the following documents: a declaration issued by a product manufacturer or designer, paper collecting company, recycling company or an equivalent organization. The declaration shall be supported by a list of non-paper materials used in a product.

Do you think that sub-criterion 3.1 should be changed?

- Yes
- No
- No opinion

Please provide justification for your answer

*500 character(s) maximum*

### **3.16. Sub-criterion 3.2. Repulpability**

Select one option to show or hide the original text from the legal text.

- Show
- Hide

The product shall be suitable for repulping.

Wet strength agents shall not be used except for paper carrier bags and wrapping paper, where they can be used only if the product repulpability can be proven.

Lamination, including polyethene and/or polypropylene, shall only be used to increase the durability of products with a life span of at least 1 year. This includes books, binders, folders, exercise books, calendars, notebooks and diaries. Lamination shall not be used in magazines, paper carrier bags, or wrapping paper. Double lamination shall not be used in any product.

Assessment and verification: the applicant shall provide a declaration of compliance with the criterion supported by the following documentation.

For printed paper products and stationery paper products, the applicant shall declare the non-use of wet strength agents.

For paper carrier bags and wrapping paper, the applicant shall provide a declaration of the non-use of wet strength agents. Otherwise, the applicant shall demonstrate product repulpability supported by the result(s) of test report(s) according to the PTS method PTS-RH 021, the ATICELCA 501 evaluation system or equivalent standard methods that are accepted by the competent body as providing data of equivalent scientific quality.

The applicant shall provide a declaration of the non-use of lamination for newspapers, magazines, paper carrier bags, wrapping paper, or stationery paper products. Otherwise, the applicant shall provide the result (s) of test report(s) proving repulpability according to the PTS method PTS-RH 021 or ATICELCA 501 evaluation system or equivalent standard methods that are accepted by the competent body.

For laminated products, the applicant shall provide a declaration of non-use of double lamination.

Where a part of a paper product is easily removable (for example a metal bar in a suspension file, a magazine insert or a plastic cover or a reusable exercise book cover), the repulpability test may be made without this component.

Do you think that sub-criterion 3.2 should be changed?

- Yes
- No
- No opinion

Please provide justification for your answer

*500 character(s) maximum*

### **3.17. Sub-criterion 3.3. Adhesives removability**

Select one option to show or hide the original text from the legal text.

Show

Hide

This criterion applies to printed paper, stationery paper, and paper carrier bag products.

Adhesive labels that constitute 0,50 % w/w or more of the final product shall prove the compliance with this requirement. Non-adhesive labels are exempted from fulfilling the criteria.

Unless otherwise specified, adhesives may be used only if their removability can be proven with a score of at least 71 on the EPRC Adhesive Removal Scorecard.

Pressure sensitive adhesive coatings shall be used only if their removability can be proven with at least a positive removability score according to the EPRC Adhesive Removal Scorecard.

Water-based adhesives are exempted from fulfilling this requirement.

Assessment and verification: the applicant shall provide a declaration of compliance with the adhesive removal scorecard according to the guidelines of the European Paper Recycling Council (EPRC). The declaration shall be supported by adhesive removability test results according to INGEDE Method 12, or equivalent standard methods that are accepted by the competent body as providing data of equivalent scientific quality.

For water-based adhesives, a declaration of the water-based nature of the adhesive shall be provided by the adhesive manufacturer. Safety data sheet of adhesive shall be accepted as prove of compliance only if it indicates that the adhesive used in the product is water-based.

Adhesive applications listed in the Annex of the 'Assessment of Printed Product Recyclability, Scorecard for the Removability of Adhesive Applications', are considered compliant with the requirement.

Do you think that sub-criterion 3.3 should be changed?

- Yes
- No
- No opinion

Please provide justification for your answer

*500 character(s) maximum*

### 3.18. Sub-criterion 3.4. Deinkability

Select one option to show or hide the original text from the legal text.

- Show
- Hide

This criterion applies to printed paper products and envelopes based on white paper.

The deinkability shall be proven.

The printed product is considered compliant with the requirement if all individual parameters analyzed have a positive score and the final score is at least 51 on the EPRC Deinkability Scorecard, or equivalent. Envelopes shall be exempted from performing deinkability test.

For envelopes, internal printing shall only be used for the privacy reasons and in envelopes composed of paper with a grammage of less than 135 g/m<sup>2</sup>, or with opacity level lower than 98 %. The internal printed surface shall be less than 80 % of the total interior surface minus the glued area and shall be printed with light colour shades.

Assessment and verification: the applicant or ink manufacturer shall provide a declaration of compliance with deinkability scores according to the guidelines of the European Paper Recycling Council (EPRC). The declaration shall be supported by deinking test results according to INGEDE Method 11, or equivalent standard methods that are accepted by the competent body as providing data of equivalent scientific quality.

For envelopes, the applicant shall provide a declaration of compliance with the requirement, supported by specifications of the weight/m<sup>2</sup> of the paper used according to UNE-EN ISO 536 or opacity according to ISO 2471, colour of printing ink, and % coverage of any internal printing pattern.

Printing technologies and material combinations listed in the Annex of the 'Assessment of Printed Product Recyclability, Deinkability Score' shall be considered compliant with the requirements.

Testing of printing technologies or inks must be performed on the paper type(s) that is used in a product. The test certificate can be used for prints with the same ink on the same type of substrate if the ink coverage is equal or lower than on the tested product.

Do you think that sub-criterion 3.4 should be changed?

- Yes
- No
- No opinion

Please provide justification for your answer

*500 character(s) maximum*

### **3.19. Sub-criterion 4.1. Emissions to water from rotogravure printing (in criterion 4 on emissions)**

Select one option to show or hide the original text from the legal text.

- Show
- Hide



The specific amount of Cr and Cu at the point of discharge must not exceed, respectively, 20 mg per m<sup>2</sup> and 200 mg per m<sup>2</sup> of printing cylinder surface area used in the press.

Assessment and verification: discharges of Cr and Cu shall be checked at rotogravure printing plants after treatment and immediately prior to discharge. A representative composite sample of Cr and Cu discharges shall be collected at least every 3 months. At least one annual analytical test shall be carried out by an accredited laboratory to determine the content of Cr and Cu from the composite sample according to EN ISO 11885 or equivalent standard methods that are accepted by the competent body as providing data of equivalent scientific quality.

Compliance with this criterion shall be assessed by dividing the content of Cr and Cu, as determined by the annual analytical test, by the cylinder surface used in the press during the printing. The cylinder surface used in the press during printing is calculated by multiplying the cylinder surface (=  $2\pi rL$ , where  $r$  is the radius and  $L$  the length of the cylinder) by the number of printing productions during a year (= number of different printing jobs).

Do you think that sub-criterion 4.1 should be changed?

- Yes
- No
- No opinion

Please provide justification for your answer

*500 character(s) maximum*

### **3.20. Sub-criterion 4.2. Emission from installations covered by Directive 2010/75/EU of the European Parliament and of the Council or equivalent installations**

Select one option to show or hide the original text from the legal text.

- Show
- Hide

The following requirements shall apply to printing processes covered by Annex I and VII to Directive 2010/75/EU or to equivalent printing processes outside the EU that meet specifications of Annex I and VII to Directive 2010/75/EU.

4.2(a) Volatile Organic Compounds (VOCs) and chromium (VI) emissions from publication rotogravure printing

Fugitive VOC emissions, as calculated by the solvent mass balance should be lower or equal to 2,0% of the solvent input, and TVOC (9) in waste gases shall be lower or equal to 16,0 mg C/Nm<sup>3</sup>.

Emissions of Cr(VI) to air shall not exceed 15,0 mg/tonne paper. Abatement equipment for reduction of emissions to air shall be installed

#### 4.2(b) Volatile Organic Compounds (VOCs) emission from heatset web offset printing

Total VOC emissions as calculated by the solvent mass balance should be lower or equal to 0,03 kg VOCs per kg of ink input; alternatively fugitive VOC emissions as calculated by the solvent mass balance should be lower or equal to 8% of the solvent input and TVOC emissions in waste gases should be lower or equal to 12,0 mg C/Nm<sup>3</sup>.

#### 4.2(c) Volatile Organic Compounds (VOCs) emission from flexography and non-publication rotogravure printing

Total VOC emissions as calculated by the solvent mass balance should be lower or equal to 0,24 kg VOCs per kg of ink input; alternatively fugitive VOC emissions as calculated by the solvent mass balance should be lower or equal to 9,6% of the solvent input and TVOC emissions in waste gases should be lower or equal to 16,0 mg C/Nm<sup>3</sup>.

Assessment and verification: the applicant shall provide detailed calculations and test data showing compliance with this criterion, together with related supporting documentation.

For total or fugitive VOC emissions, as applicable, solvent mass balance calculation shall be based on the production during 12 months of operation. The solvent mass balance shall be in line with the definition laid down in Part 7(2) of Annex VII to Directive 2010/75/EU. In case of a new or a rebuilt production plant, the calculations shall be based on at least three months of representative running of the plant.

A declaration of the VOC content in, inks, washing agents, damping solutions or other corresponding chemical products shall be provided by the applicant or a chemical supplier.

The solvent mass balance shall be performed on yearly basis. A written evaluation shall be done by a responsible staff member. Upon request, the evaluation shall be provided to the competent body.

For the monitoring of total TVOC emissions to air in waste gases, any stack with a TVOC load less than 10 kg C/h should be monitored at least once a year according to EN 12619, or equivalent. In the case of a TVOC load less than 0,1 kg C/h (as an annual average), or in the case of an unabated and stable TVOC load of less than 0,3 kg C/h, the monitoring frequency may be reduced to once every three years or the monitoring may be replaced by calculation provided that it ensures the provision of data of an equivalent scientific quality.

For any stack with a TVOC load higher or equal to 10 kg C/h the monitoring shall be continuous according to EN 15267-1, EN 15267-2, EN 15267-3 and EN 14181. For continuous measurement, the data shall represent daily average over the period of one day based on valid hourly or half-hourly averages.

The VOC destruction in the abatement system (e.g. thermal oxidation, adsorption to activated carbon) shall be determined, with a frequency of at least every three years, by combined measurements of VOC concentration in raw gas and clean gas.

The measurement data of waste gas shall be registered and available upon request for the competent body.

The applicant shall provide a description of the system in place, together with a documentation related to the control and the monitoring of Cr(VI) emissions. The documentation shall include the test results related

to the reduction of Cr(VI) emissions to the air.

(9) Total volatile organic carbon, expressed as C (in air).

Do you think that sub-criterion 4.2 should be changed?

- Yes
- No
- No opinion

Please provide justification for your answer

*500 character(s) maximum*

### **3.21. Sub-criterion 4.3. VOCs emission from printing processes not covered by Directive 2010/75/EU of the European Parliament and of the Council**

Select one option to show or hide the original text from the legal text.

- Show
- Hide

The following requirements shall apply to printing processes not covered by Annex I or by Annex VII Part 2 to Directive 2010/75/EU or to equivalent printing processes outside the EU that do not meet specification of Annex I and VII to Directive 2010/75/EU.

Total VOC emissions as calculated by the solvent mass balance shall be lower or equal to:

- 4,5 kg VOC/tonne of paper for sheet fed offset printing;
- 1,0 kg VOC/tonne of paper for digital printing;
- 2,0 kg VOC/tonne of paper for heat set web offset printing;
- 2,5 kg VOC/tonne of paper for cold set web offset printing;
- 3,0 kg VOC/tonne of paper for other rotogravure, flexography, rotary screen printing, laminating or varnishing units.

Alternatively, where off-gas treatment is applied fugitive VOC emissions as calculated by the solvent mass balance should be lower or equal to 10 % of the solvent input and TVOC emission in waste gases should be lower or equal to 20 mg C/Nm<sup>3</sup>.

Volatile solvents from the drying process of heat-set offset, rotogravure and flexography printing shall be managed by means of solvent recovery or thermal treatment or any equivalent system, i.e. substitution by

the use of water- based inks.

Assessment and verification: the applicant shall provide a description of the system in place together with documentation and test results related to the control and the monitoring of emissions to air.

For total or fugitive VOC emissions, as applicable, solvent mass balance shall be calculated on the production during 12 months of operation. The solvent mass balance shall be in line with the definition laid down in Part 7(2) of Annex VII to Directive 2010/75/EU. For the allocation of VOCs emission into mass of paper, all printed surfaces shall be calculated. In case of a new or a rebuilt production plant, the calculations shall be based on at least three months of representative running of the plant.

For the monitoring of total TVOC emissions to air in waste gases, any stack with a TVOC load less than 10 kg C/h should be monitored at least once a year according to EN 12619, or equivalent. In the case of a TVOC load less than 0,1 kg C/h (as an annual average), or in the case of an unabated and stable TVOC load of less than 0,3 kg C/h, the monitoring frequency may be reduced to once every three years or the monitoring may be replaced by calculation provided that it ensures the provision of data of an equivalent scientific quality.

A declaration of the VOC content in inks, washing agents, damping solutions or other corresponding chemical products shall be provided by the applicant or a chemical supplier.

Do you think that sub-criterion 4.3 should be changed?

- Yes
- No
- No opinion

Please provide justification for your answer

*500 character(s) maximum*

### 3.22. Sub-criterion 5.1. Waste management system (in criterion 5 on waste)

Select one option to show or hide the original text from the legal text.

- Show
- Hide

The facility where the product is manufactured shall have in place a system for handling waste, which addresses and documents the measures taken to reduce the amount of solid and liquid waste, including waste paper, ink waste, cleaning agent solution and dampening solution waste as defined by local or national regulatory authorities.

The waste management system shall be documented or explained and shall include information on at least the following procedures:

— handling, collection, separation and use of recyclable materials from the waste stream;

— recovery of materials for other uses, such as incineration for raising process steam or heating, or agricultural use;

— handling, collection, separation and disposal of hazardous waste, as defined by the relevant local and national regulatory authorities;

— continuous improvement objectives and targets relating to the reduction of waste generation and the increase of reuse and recycling rates.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, together with a description of the procedures adopted for waste management. The applicant shall provide a waste management plan for each of the sites concerned. Where the waste management is outsourced, the sub-contractor shall provide a declaration of compliance with this criterion as well.

Applicants registered with EU Eco-Management and Audit Scheme (EMAS) and/or certified according to ISO 14001 shall be considered as having fulfilled this criterion if:

(1) the inclusion of waste management for the production site(s) is documented in the company's EMAS environmental statement; or

(2) the inclusion of waste management is sufficiently addressed by the ISO 14001 certification for the production site(s).

Do you think that sub-criterion 5.1 should be changed?

- Yes
- No
- No opinion

Please provide justification for your answer

*500 character(s) maximum*

### 3.23. Sub-criterion 5.2. Paper for recycling from printing facilities

Select one option to show or hide the original text from the legal text.

- Show
- Hide

This criterion applies to printed paper products. The amount of waste paper 'X' produced shall not exceed the values reported in the following table.

Printing method	Maximum waste paper (%)
Sheet offset	23
Cold-set, newspaper	10
Cold-set, form printing	18
Cold-set rotation (except newspapers)	19
Heat-set rotation	21
Rotogravure printing	15
Flexography printing	17
Digital printing	10
Screen printing	23

Where:

X = annual tonnes of waste paper produced during the printing (including finishing processes) of the eco-labelled printed paper product, divided by annual tonnes of paper purchased and used for the production of eco-labelled printed paper product.

Where the printing house carries out finishing processes on behalf of another printing house, the amount of waste paper produced in those processes shall not be included in the calculation of 'X'.

Where the finishing processes are outsourced to another company, the amount of waste paper resulting from the outsourced work shall be calculated and declared in the calculation of 'X'.

Assessment and verification: the applicant shall provide a description of the calculation of the amount of waste paper, together with a declaration from the contractor collecting the waste paper from the printing house. The outsourcing terms and calculations on the amount of paper waste involved in the finishing processes shall be provided.

The period for the calculations shall be based on the production during 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.

If the calculation of annual tonnes of waste paper produced during the printing of the eco-labelled printed paper product is not technically feasible, the applicant may provide calculations regarding the total amount of paper for recycling produced annually in the printing house.

Do you think that sub-criterion 5.2 should be changed?

- Yes
- No
- No opinion

Please provide justification for your answer

*500 character(s) maximum*

### 3.24. Sub-criterion 5.3. Paper for recycling from stationery paper product and carrier bags production sites

Select one option to show or hide the original text from the legal text.

- Show
- Hide

The criterion refers to stationery paper products and paper carrier bag products. The amount of waste paper 'X' shall not exceed:

- 19 % for envelopes;
- 15 % for writing stationery products, excluding diaries;
- 20 % for diaries and filing stationery products printed on one side;
- 30 % for filing stationery products printed on both sides;
- 11 % for paper bags and wrapping paper.

Where:

X = annual tonnes of waste paper produced during the manufacturing of the eco-labelled stationery paper and paper carrier bag product (including finishing processes), divided by annual tonnes of paper purchased and used for the production of eco-labelled stationery paper and paper carrier bag product.

Where the printing house carries out finishing processes on behalf of another printing house, the amount of waste paper produced in those processes shall not be included in the calculation of 'X'.

Where the finishing processes are outsourced to another company, the amount of waste paper resulting from the outsourced work shall be calculated and declared in the calculation of 'X'.

Assessment and verification: the applicant shall provide a description of the calculation of the amount of waste paper, together with a declaration from the contractor collecting the waste paper from the printing house. The outsourcing terms and calculations on the amount of paper waste involved in the finishing processes shall be provided.

The period for the calculations shall be based on the production during 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.

If the calculation of annual tonnes of waste paper produced during the manufacturing of the eco-labelled stationery paper and paper carrier bag product is not technically feasible, the applicant may provide calculations regarding the total amount of paper for recycling produced annually in the plant.

Do you think that sub-criterion 5.3 should be changed?

- Yes
- No
- No opinion

Please provide justification for your answer

*500 character(s) maximum*

### 3.25. Criterion 6 - Energy use

Select one option to show or hide the original text from the legal text.

- Show
- Hide

The site where the EU Ecolabel product is manufactured shall have established an energy management system addressing all energy consuming devices (including machinery, lighting, air conditioning, cooling). The energy management system shall include measures for the improvement of energy efficiency and shall include information on at least the following procedures:

- establishing and implementing an energy data collection plan in order to identify key energy figures;
- analysis of energy consumption that includes a list of energy consuming systems, processes and facilities;
- identification of measures for more efficient use of energy;
- continuous improvement objectives and targets relating to the reduction of energy consumption.

Assessment and verification: the applicant shall provide a declaration of compliance for the production site, supported by a description of the energy management system.

The applicant certified according to ISO 50001, EN 16247 or an equivalent standard/scheme shall be considered as having fulfilled this requirement.

The applicant registered with EMAS shall be considered as having fulfilled this requirement if the inclusion of energy management in the scope of EMAS for the production site(s) is documented in the EMAS environmental statement.

The applicant certified according to ISO 14001 shall be considered as having fulfilled this criterion if the inclusion of energy management plan is sufficiently addressed by the ISO 14001 certification for the production site.

The continuous improvement objectives and targets relating to the reduction of energy consumption shall be enforced on yearly basis. A written evaluation shall be done by a responsible staff member. Upon request, the evaluation shall be provided to the competent body.



Do you think that 'criterion 6 - Energy use' should be changed?

- Yes
- No
- No opinion

Please provide justification for your answer

*500 character(s) maximum*

### 3.26. Criterion 7 - Training

Select one option to show or hide the original text from the legal text.

- Show
- Hide

All relevant members of staff participating in the day-to-day operation of the production site shall be given the knowledge necessary to ensure that the Ecolabel requirements are fulfilled and continuously improved.

Assessment and verification: the applicant shall provide a declaration of compliance with this criterion, together with details of the training programme, its content, and an indication of which staff have received what training and when. The applicant shall provide to the Competent Body also a sample of training material.

Do you think that 'criterion 7 - Training' should be changed?

- Yes
- No
- No opinion

Please provide justification for your answer

*500 character(s) maximum*

### 3.27. Criterion 8 - Fitness for use

Select one option to show or hide the original text from the legal text.

- Show
- Hide

The product shall be suitable for its purpose.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion supported by at least one of the following documents:

- letter/document/statements issued by clients for a specific product, assuring that the product met their specifications and performs well in its intended application;
- detailed description of procedure of handling consumer complaints;
- documentation demonstrating the quality certification, in accordance with the standard ISO 9001, or equivalent
- documentation demonstrating the paper quality, in accordance with the standard EN ISO/IEC17050-1, which provides general criteria for suppliers' declaration of conformity with standards.

Do you think that 'criterion 8 - Fitness for use' should be changed?

- Yes
- No
- No opinion

Please provide justification for your answer

*500 character(s) maximum*

### **3.28. Criterion 9 - Information on the product**

Select one option to show or hide the original text from the legal text.

- Show
- Hide

The following information shall appear on the paper bag product:

'Please reuse this bag'.

The following information shall appear on the printed paper product:

'Please collect used paper for recycling'.

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, supported by an image of the product with the information required.

Do you think that 'criterion 9 - Information on the product' should be changed?

- Yes
- No
- No opinion

Please provide justification for your answer

500 character(s) maximum

### 3.29. Criterion 10 - Information appearing on the EU Ecolabel

Select one option to show or hide the original text from the legal text.

- Show
- Hide

If the optional label with text box is used, it shall contain the following three statements:

— low process emissions to air and water;

— the product is recyclable;

— paper with low environmental impact used.

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](http://ec.europa.eu/environment/ecolabel/documents/logo_guidelines.pdf)

Assessment and verification: The applicant shall provide a declaration of compliance with this criterion, supported by 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.

Do you think that 'criterion 10 - Information appearing on the EU Ecolabel' should be changed?

- Yes
- No
- No opinion

Please provide justification for your answer

500 character(s) maximum

Your opinion matters to us.

Thank you very much for taking the time to contribute to this consultation.

