

EU Ecolabel criteria revision for printed paper products - Initial scoping questionnaire

Fields marked with * are mandatory.

1. Respondent details (personal data will be treated as confidential)

* 1.1 Please state your name

* 1.2 Please add your email address

1.3 Which of the following options best reflects the type of organisation /interests that you represent.

- Buyer/Consumer interests/NGO
- EUEB Member/Competent Body
- Government (Local, regional, national)
- Industry - End product side (i.e. Seller of printed materials)
- Industry - Intermediate (i.e. Print-house)
- Industry - Supplier (i.e. Paper substrate, printing equipment or chemicals)
- Industry - Waste management (i.e. Recycling companies)
- Other

Please specify

* 1.4 Has/is your organisation:

- Been actively involved with the EU Ecolabel criteria development process previously for any paper-based product groups?
- Obtained an EU Ecolabel license for printed paper products?
- In the process of applying for an EU Ecolabel license for printed paper products?
- Potentially considering to apply for an EU Ecolabel license in the future for printed paper products?

None of the above

2. Background

* In the case you have applied for a printed paper EU Ecolabel in the past, have you had any difficulties to understand the scope?

- No, it was clear
- Yes, please specify what you found unclear

Please specify

* Have you had a printed paper product that could have not been awarded with the EU Ecolabel because did not fit in the scope?

- No, all the products are enclosed in the current scope
- Yes, please specify which ones

Please specify

3. Focus of EU Ecolabel product group for printed paper products

The current criteria are almost exclusively centred on the printing-house (e.g. substrate going in, chemicals going in, emissions coming out and waste coming out) instead of the final product (recyclability).

Concerns have also been raised about how to correctly count the number of licensed printed paper products, because this can be highly variable with time in any one particular print house.

In print houses which produce a combination of EU Ecolabel and non-EU Ecolabel products, it can be difficult to know how to allocate emissions and waste between the different products and assess and verify that an appropriate allocation has been done.

Despite these obvious drawbacks, it is uncertain if individual print houses are willing or able to adapt to make their entire production compliant with EU Ecolabel criteria.

*3.1 Do you think it would be more appropriate to change the product group from a "product" (i.e. individual products EU Ecolabelled) to a "service" (i.e. the print-house, and thus all of its products, is EU Ecolabelled)?

- Yes, it should be changed to a service.
- Maybe, the possibility of changing to a printing service should be considered.
- No Opinion / Don't know.
- No, the focus should remain only on products.

(Optional) Please provide any additional comments or suggestions for the EU Ecolabel printed paper product [group focus](#) here.

4. EU Ecolabel scope and definition for printed paper products

*The **Scope** of the **EU Ecolabel for Printed Paper products (Commission decision 2012/481/EU)** encompasses following:*

- *Printed paper product that consist of at least 90 % by weight of paper, paperboard or paper-based substrates.*
- *Books, catalogues, pads, 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 part of the final printed paper shall be considered to form part of the printed paper product.*
- *The product group 'printed paper' shall **not** include:*
 - *(a) printed tissue paper,*
 - *(b) printed paper products used for packaging and wrapping,*
 - *(c) folders, envelopes and ring binders.*

*4.1 Should the scope be amended?

- No, the scope is adequate.
- Yes, the scope should be amended (reasoning can be added below).
- No Opinion / Don't know

(Optional) Please provide any additional comments or suggestions for the EU Ecolabel printed paper products [scope](#) here.

*4.2 Should any additional criteria be included or the revision should only focus on the existing ones?

- No, only the existing criteria should be revised.
- Yes, additional criteria are necessary.
- No Opinion / Don't know

(Optional) Please provide any additional comments or suggestions regarding 4.2 question here

5. Existing EU Ecolabel criteria for printed paper products

5.1. Substrate [Criterion 1]

The conditions related to the paper substrate of the final product are described in the Commission Decisions 2011/333/EU and 2012/448/EU. Additional clarifications regarding assessment and verification are provided.

Following the above mentioned, please state how you agree to the next requirements.

	Strongly disagree	Disagree	Neutral	Agree	Strongly disagree
* The printed paper product shall be printed only on paper bearing the EU Ecolabel.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Specifications including weight/m2 of the paper, should be provided.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Supplier names of the paper used, should be provided.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* A copy of the valid EU Ecolabel certificate of the					

paper used, should be included in the application.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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(Optional) If you consider to provide any further comments about this criterion, please fill them in here.

5.2. Excluded or limited substances and mixtures [Criterion 2]

The final product or any part of it shall not contain substances and/or mixtures meeting the criteria for classification with the hazard statements or risk phrases in accordance with the regulation (EC) No 1272/2008 and the Council directive 67/548/EEC or substances referred to in Article 57 of Regulation (EC) No 1907/2006 shall not be used for printing coating and finishing of the final paper product product.

Please state your opinion regarding the following requirements on excluded or limited substances and mixtures.

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree
* Only hazardous substances and mixtures that may remain in the final product in concentrations >0.1% by weight should be restricted.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Biocides are permitted only if their bioaccumulation potentials are characterised by log Pow (log octanol /water partition coefficient) < 3.0 or an experimentally determined bioconcentration factor (BCF) < 100 or equal to it.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

<p>*Toluene for use in rotogravure printing processes shall be derogated if an encapsulation, recovery or any equivalent system is in place to control and monitor this emission with recovery efficiency 92%.</p>	○	○	○	○	○
<p>* UV varnishes and inks classified H412/R52-53 are also to be derogated.</p>	○	○	○	○	○
<p>* Alkyl phenol ethoxylates, halogenated solvents and phthalates shall not be added to chemicals used in the printing processes.</p>	○	○	○	○	○
<p>*The heavy metals cadmium, copper, lead, nickel, chromium VI, mercury, arsenic, soluble barium, selenium, and antimony or their compounds shall not be used in printing chemicals.</p>	○	○	○	○	○

(Optional) If you consider to provide any further comments about this criterion, please fill them in here.

5.3. Recyclability [Criterion 3]

The printed paper recyclability criterion is framed by the conditions of the following matrix.

Please state how you agree to these conditions.

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	Strongly disagree	Disagree	Neutral	Agree	Strongly agree
* The printed paper shall be recyclable.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The printed paper shall be de-inkable.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Wet strength agents may be used only if their recyclability of the finished product can be proven.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Adhesives may be used only if their removability can be proven.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Coating varnishes and lamination may be used only for covers books, pads, magazines and catalogues, exercise books.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The de-inkability shall be proven.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

(Optional) Please add any further comments or opinions that you have regarding recyclability.

5.4. Emissions [Criterion 4]

This criterion encompasses emissions to water and to air. Please state how you agree to the specific requirements of this criterion

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree
* Wastewater from film processing, plate production					

and photo-chemicals shall not be discharged to a sewage treatment plant.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The amount of Cr discharged into sewage treatment must not exceed 45 mg/m ² of printing cylinder surface used in the press.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The amount of Cu discharged into sewage treatment plant must not exceed 400 mg per m ² of printing cylinder surface used in the press.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The total amount of volatile organic compounds (VOC) as calculated in the current EU Ecolabel guidelines shall not exceed 5 kg per tonne of purchased paper for printing purposes.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Emissions limits apply to the printing, coating and finishing processes of the paper components.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Rotogravure printing emissions of VOC to air shall not exceed 50 mg C/Nm ³ .	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Emissions of Cr(+6) to air shall not exceed 15 mg/tonne paper.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* For all printing processes the emissions of VOC to air must not exceed 20 mg C/Nm ³ .	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

(Optional) Please add any further comments or opinions that you have regarding emissions or printing technologies.

5.5. Waste [Criterion 5]

This criterion is defined by two key aspects, the waste management system requirements and the waste management amount. Both aspects encompass include specific conditions as follows

5.5.1. Waste management system [Criterion 5a]

Please state how you agree with the following specific conditions related to the waste management

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree
* Handling, collection, separation and use of recycled materials from the waste stream, shall be documented.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Documentation should include information about recovery of materials for other uses, such as incineration for raising process steam.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Documentation should include information about handling, collection, separation and disposal of hazardous waste.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* A declaration of compliance regarding the waste criterion should be delivered every year.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

5.5.2. Waste production [Criterion 5b]

Please state how you agree with the following specific conditions related to the waste management amount

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree
* The maximum annual amount of waste paper produced during each printing process (including finishing processes) should be expressed as percentage of the total annual paper purchased and used for production of ecolabelled printed paper products.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Where the printing house carries out finishing processes on behalf of another house, the amount of waste of those processes should not be included in its waste paper amount.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* In the case the printing house outsources the finishing processes to another company, the amount of waste paper should be included in its paper waste amount.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The applicant should provide a declaration about the compliance with this criterion together with the description of waste management procedures.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

5.6. Energy use [Criterion 6]

Please state how you agree with the conditions defining the energy use criterion

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree
* The printing house shall establish a register for all energy consuming processes and devices.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The printing house shall provide with measures for energy efficiency improvement.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Energy use criteria should include both fuel/heat and electricity consumption?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

(Optional) Please add any further comments or suggestions related to energy use criterion here.

5.7. Training [Criterion 7]

Please state how you agree with the conditions of this criterion

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree
* Members of staff should be aware about the EU Ecolabel requirements and contribute fulfilling and improving them.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Training activities and the respective material should be provided the verified by the competent body.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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5.8. Fitness for use [Criterion 8]

Please state how you agree with the conditions of this criterion

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree
* Product should be suitable for its purpose.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Applicant should provide appropriate documentation in compliance with this criterion.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* A person in the organisation should be responsible to guarantee that the ecolabel requirements are fulfilled.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* A contact person, responsible for reporting must be appointed.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

5.9. Information on the product [Criterion 9]

Please state how you agree with the conditions of this criterion

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree
* The indication 'Please collect used paper for recycling' should be depicted on the product.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Sample of the product packaging shall be provided by the applicant.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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(Optional) Please add any further comments or opinions that you have regarding this criterion here.

5.10. Information on the EU Ecolabel [Criterion 10]

Please state how you agree with the following conditions

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree
* The printed paper is recyclable.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The product is printed using paper with low environmental impact	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Emissions of chemicals to air and water of paper production and printing process have been limited.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Applicant shall provide a sample of the printed paper product showing the label and the declaration of compliance with this criterion.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

(Optional) Please add any further comments or suggestions related to the last criterion here.