

EDANA POSITION ON THE DEVELOPMENT OF AN EU ECOLABEL FOR ABSORBENT HYGIENE PRODUCTS 24 October 2012

Summary

In light of the stakeholder dialogue so far on the development of EU Ecolabel criteria for absorbent hygiene products (AHPs), the challenge of producing scientifically sound criteria that enable the recognition of the best environmentally performing products or the best products in terms of environmental performance compared to other products available on the market proves very difficult. This difficulty is mostly due to:

1. The complexity of the category, illustrated by the great number of overlapping types, models and sizes of baby diapers and feminine care products. This complexity reflects the great diversity of needs of the users of the products across the EU.
2. Due to the complex nature of the products, universal market standard performance tests for baby diapers and feminine care products cannot provide needed assurances that products deliver consumer needs and expectations.
3. The lack of a single internationally recognised life cycle assessment database for environmental impacts.
4. Conflicting approaches towards ecolabelling, mainly between life cycle based criteria and pass-fail criteria

These obstacles make it extremely difficult to develop scientifically sound criteria able to effectively distinguish the more or less environmental friendly products.

Significant reductions of the environmental impacts of absorbent products have been achieved without the need for an ecolabel to drive progress in this field. Manufacturers of absorbent hygiene products recognise their responsibilities for product stewardship and, Innovation is currently driven by consumer expectations and ambitious sustainability commitments. The supporting rationale for this position is provided below.

General principles for ecolabels

EDANA believes that all forms of environmental information, including any environmental labels, intended for consumers and/or commercial purchasers on products throughout the value-chain¹ should be consistent with the following principles:

1. **Be voluntary**
2. **Promote innovation:** Environmental labelling should have the additional function of being able to reward and promote innovation - encompassing technological progress - that leads to environmental improvement. Labels that have criteria based on an evaluation of products that exist in the market today tend to reward existing technologies and may represent a barrier to future innovation if they do not holistically examine the product's whole lifecycle
3. **Provide meaningful information to consumers:** Information should be provided to consumers in a way that is truthful, can easily understand and make informed purchasing decisions. It should provide the holistic environmental profile. The information provided must be accurate and relevant to the environmental performance of the product.
4. **Define the desired direction for improvement based on LCA methodology, but not the means to get there**
5. **Deliver meaningful environmental improvements based on a holistic examination of the product and contribution from all its lifecycle phases**
6. **Be transparent:** the criteria or basis for claims for the Ecolabel should be clear, publicly available and readily understandable by the consumer
7. **Be non-discriminatory:** ecolabel systems should be developed such that its principles can be applied to future product or products not yet on the market in the EU
8. **Be based on sound science:** all forms of ecolabels must be supported by scientific evidence, using methods accepted across the scientific and technical community
9. **Be substantiated:** there must be a reasonable and traceable basis for verifying the seal of approval or environmental claim
10. **Acknowledge** that performance is best judged in-market by consumers. Often, pure performance tests on a laboratory basis only would be misleading because of a lack of in-use experience by consumers.

¹ EDANA member companies range from raw materials manufacturers to producers of finished goods and include manufacturers of intermediate materials such as nonwovens and superabsorbent polymers. EDANA membership spans across a wide range of applications and products such as absorbent hygiene products, filtration media or geotextiles.

Absorbent hygiene products are already very efficient

Manufacturers of AHPs have achieved significant progress in reducing the environmental impact of their products and continue to pursue ambitious sustainability targets without any legal or regulatory incentives to do so. For instance, between 1987 and 2011, the weight of an average baby diaper was reduced by more than 44%, down to 36 grams.

Baby diapers and feminine care products form a complex product category

AHPs should be adequate for the needs of the consumers. It is not possible for all products to fulfil a level of performance equal to the best-performing AHPs on the market. While a minimum level of performance could be considered, EDANA members believe that consumers set this standard and if products do not meet their expectations they simply will not purchase them. There are no official standardised tests to objectively measure the overall performance of products or the level of acceptance/satisfaction of consumers.

Baby diapers and feminine care products are not homogeneous, simple product types. They are segmented as follows:

Baby diapers:

- New-born
- Various sizes according to the weight of the baby
- Taped diapers vs. pant diapers

All diaper forms are available in different sizes according to the weight of the baby.

Femcare products:

- Tampons with/without applicator, and in different absorbencies
- Sanitary pads
- Pantyliners

All pad and pantyliner products are available in different sizes to manage different menstrual flows.

The design and marketing of absorbent hygiene products can greatly vary from one country to the next. It is influenced by a number of factors such as:

- Birth rates
- Ageing population
- GDP per capita
- Skin health benefits vs. alternatives (reusable products)
- Hygiene and public health considerations
- Changing consumer habits/needs
- Different financing/reimbursement models
- Price pressure in public procurement
- Affordability / buying power
- Growth of private label products
- Consolidation in retail sector

EDANA members are concerned with the idea of basing the ecolabel on “a level of performance equal to the best-performing AHPs on the market”. This would imply that two-tier or three-tier strategies are impossible for eco-labeled products and all our products need to be over-dimensioned (e.g. for baby diapers – ‘up to 12 hours’ claims). The definition of the best performing AHPs is also problematic as this could mean that manufacturers have to produce a different product for e.g. the UK and Germany as on these markets different products are market leaders. Only criteria which focus on the environmentally best performing products with a holistic view on their in-use performance would be in line with the regulation.

Due to the complex nature of products and markets, universal market standard performance tests for baby diapers and feminine care products cannot provide needed assurances that products deliver consumer needs and expectations.

Product performance tests exist for key indicators such as absorbency as measured in WSP 354.1 (11), WSP 350.1 (09) - Syngina Method for tampons, in-use test criteria like diaper absorbency, skin health evaluation, fit, easy application, breathability, skin wetness, leakage rate, etc. These tests are typically done in-house and have been developed by industry and external experts. Tests may vary from one company to another but have the common goal of assuring products meet desirable consumer needs and expectations.

So far, to the best of our knowledge, (other than tampon absorbency testing) no relevant health-based organisation (health care providers, health insurance organisation, etc.) has defined a relevant universal market standard. Universal market standard performance tests do not provide an advantage for consumers because performance is a reflection of many varying product elements that provide advantages to consumers, of which only some may be needed or present in any given product. If such a standard had to be implemented at most it should represent minimum values.

Product performance is measured by a wide spectrum of consumer-based needs and reflects the desired function as well as other benefits that can't be measured by simple bench-tests.

Performance should be interpreted in a broad sense – both the main function which is absorption of urine/faeces or menses, but also with additional consumer-driven functions in terms of skin health, leakage, ease of application, discreetness, fit, etc.

The EU Ecolabel criteria should not prescribe a generic bench testing concept like “Absorption capacity under pressure”, because performance is defined by a matrix of functional benefits so that the applicant is free to select the appropriate test method and the criteria do not limit innovation in new test methods or introduce artificial expectations of performance. However, if specific tests have to be required, the specific test method should always be named completely (number, organisation, etc.), be specific to the product and body fluid collected. Depending on the suggested test method there might also be an overlap, as “Absorption capacity under pressure”, “Retention” and “Leakage protection” are somewhat redundant. Furthermore not all tests are equally important for all products.

Using diapers as an example for managing performance testing, absorption capacity is a criterion that can lead to misinterpretation, as it should be assessed not versus maximum absorption, but versus an optimum, i.e. not too much and not too little. If the capacity is below the optimum, this can impact the dryness and leakage performance. If the capacity is above the optimum, it

does not add further performance. Diapers that have a higher absorption capacity are ineffective and have a higher cost (consumers will pay for unnecessary material) and also have environmental disadvantages, as material is wasted without performance benefit.

Moisture Retention is considered an important parameter with correlation to the dryness performance of a diaper core. The parameters for testing should follow realistic conditions. For baby diapers as the highest need for good dryness performance is on overnight changes with the long wearing time and high loads, these conditions should be taken for testing. Thus, retention should be tested after applying at least the average overnight load provided above, for better discrimination a value covering the 90%-tile of loads may be used. Also, the test has to be tested under realistic pressures.

For baby diapers, leakage protection is the key performance criteria from a parents' point of view. As this parameter is influenced by several parameters, it can only be assessed in panel testing. A lab test that correlates to some extent (60-70% impact on total leakage) is speed of absorption under pressure

Skin dryness and protection is the key parameter (both for diapers and fem care products), as skin dryness and skin protection have key impact on wearing comfort. It is best to assess this via clinical methods (TEWL, corneometry), alternatively via panel testing.

Fit and comfort can only be assessed through user panel testing.

The challenge of setting relevant criteria

Our industry supports the assessment of products on the basis of an LCA approach. In this context, the types of materials used and their composition should be flexible provided LCA limits are set (this provides flexibility whilst also driving environmental improvement). Given that innovation cycles are relatively short in this industry (6-12 months) and that innovations are protected by patents, it is crucial to shape EU Ecolabel criteria in a way that innovation is not limited.

We do not support setting strict criteria that are based on pass/fail and can potentially hinder innovation. We support the use of LCA to identify opportunities for environmental improvement and to report progress.

Using environmental improvement activities as a source for criteria could result in limiting innovation and/or be very burdensome as it would in some cases require an eco-design report for each product and variant.

A maximum weight limit would ban the selection of an appropriate size for large/very absorbent sizes. Furthermore this would only be sensible if the link between weight and environmental impact is monotonic and independent of other variables (which it is not!).

Additionally many criteria proposed so far are already state-of-the-art in the industry (e.g. chlorine-free bleached fluff pulp) or legally implemented via different regulations, thus segmentation and environmental progress is not possible with these criteria.

Sustainable sourcing of natural materials should only be required if this is the main driver of environmental improvements in an LCA (e.g. in an analysis of certified sustainable forestry vs. comparable uncertified forestry). An eco-design report as a summary of a product development and improvement process based on LCA principles generally is acceptable. However, the criteria

with report format and report content should be acceptable for small and medium enterprises. This would probably mean that for this project a guideline with minimum specific, but generic requirements are developed or at least linked to existing guidelines.

Industry recommendations for the developments of ecolabel criteria

The main drivers of environmental impacts of absorbent hygiene products are raw materials. The main improvement potential is a reduction of raw materials with an improved or at least constant product performance. All AHP manufacturers seek to limit raw material input whenever possible.

The level of produced total waste is usually already very low and most of this pre-consumer waste is already diverted away from landfill and mostly recycled as material or recovered as energy. Packaging and transport only contribute slightly to the overall environmental impact. Production itself is already very efficient, with production waste in the very low single digits range, which is frequently going into recycling and/or incineration with energy recovery. Electricity is the main source of energy in production, improvements are possible but as the overall share is small, the reduction in impacts is tiny.

We agree with the objective to minimize the use of resources in the manufacturing of AHPs. Our industry supports the use of Life Cycle Assessments, conducted in accordance with the ISO 14040/14044 series of standards. The AHP product category rules (PCR) developed by EDANA are also recommended.

As products all start at different levels, the principle of a commitment to reduce the environmental impact would not exclude products that are potentially much worse than average. Rather than requiring a commitment to reduce the environmental impact year-by-year, AHP producers would support awarding the ecolabel on the basis of clear limits for all relevant indicators. These limits could be reviewed on a regular basis and adjusted according to best practices.

We recommend focussing on the main indicators, i.e.:

- Consumption of non-renewable resources (i.e. material and energy resources)
- Consumption of renewable resources (i.e. material and energy resources)
- Global warming potential

For AHPs that contain a significant amount of pulp or similar renewable resources, additional indicators may be helpful, such as water use and eutrophication potential in LCA, and verification of sustainable forestry certifications. These indicators are not meaningful statistically for products comprised of mainly fossil-fuel derived materials.

The majority of AHP producers are global organisations producing a wide portfolio of products. Decisions on whether and how to report sustainability performance are made typically by a global corporate infrastructure, and to try and link this to individual products sold in one part of the world is not workable. This is even more difficult for small and medium enterprises given the costs associated with these prescriptions. Usually a (production) site is certified, so the criteria should not focus on divisions, distributors, local sales organisations, logistics operations, etc.

Environmental management systems are probably the best suited solutions to achieve progress. However, these systems and their external certification can be very burdensome, especially for SMEs, they are so far not very common and they focus vertically on total organisations, not on

ecolabeled products. Instead of requiring (certified) specific systems, it should always be possible to achieve the same level with an internal system.

References

LCA on nappies by DEFRA, UK, 2005-2008

http://randd.defra.gov.uk/Document.aspx?Document=WR0705_7589_FRP.pdf

LCAs were conducted within the industry association EDANA. See

<http://www.edana.org/content/default.asp?PageID=80> for details.

Industry has conducted LCA (see 2007-2008 Sustainability Report endorsed by the European Commission: <http://www.edana.org/content/default.asp?PageID=75&DocID=2132>).