



# **Development of EU Ecolabel criteria and Green Public Procurement criteria for "Sanitary Products"**

## **Preliminary Background Report: Identification of Suitable Product Groups**

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# 1. Background

On 16 July 2008 the European Commission presented the Sustainable Consumption and Production and Sustainable Industrial Policy (SCP/SIP) Action Plan. The plan includes a series of proposals on sustainable consumption and production aiming at:

- Improving the environmental performance of products;
- Increasing the demand for more sustainable goods and technologies;
- Stimulating the EU industry innovation.

The Council endorsed the Action Plan in its conclusions adopted on 4 December 2008. A range of policies are already in place in order to achieve the goals previously outlined.

The EU Integrated Product Policy (IPP) is for example a toolbox composed of voluntary and mandatory instruments which seek to reduce the environmental impacts due to products and services along all the phases of their life-cycle.

Two important voluntary policy instruments within the toolbox are the EU Ecolabel and the EU Green Public Procurement (GPP), which are intended to promote products and services showing lower negative environmental impacts, when compared with functionally alternative options belonging to the same product/service group. In doing so, these schemes can contribute to the implementation of a more sustainable market system in EU.

EU Ecolabel and GPP currently cover a wide list of products and services, with further groups being continuously added. In the 2009-2013 working-plan, the European Union Ecolabelling Board (EUEB) and the European Commission identified "Sanitary Products" as one of the product categories which are candidate to be included within the Ecolabel and, possibly, GPP schemes. Nevertheless, a consistent definition of the scope of this product group is still to be discussed.

## 2. Objective

The purpose of this document is to identify, to screen and to propose a list of products which may be included within the scope of the Sanitary Products (SP) group.

First of all, a preliminary definition of "Sanitary Product" is given.

Similar environmental labelling and green public procurement schemes dealing with this category of products are then reviewed in order to identify what products are included in the existing approaches.

The products are finally classified on the basis of their functionality and screened in order to propose a preliminary scope for this product category.

The scoping will be improved including further environmental and economic information.

### 3. Analysis of existing Ecolabel and GPP schemes related to "Sanitary Products"

According to <http://dictionary.cambridge.org/dictionary/british/sanitary>, a product can be defined as "sanitary" when it protects health by the removal of dirt and waste, especially human waste. The product should obviously be also clean and not dangerous for the health.

Different labelling and public procurement schemes deal with products which can fit with the previous definition:

- The **EU Ecolabel** for "**Tissue Paper**" (valid until 2013) handles with sheets or rolls of tissue paper used for **personal hygiene**, absorption of liquids and/or cleaning of soiled surfaces. The product group does not comprise **wet wipes and other sanitary products**; tissue products laminated with other materials than tissue paper; products as referred to in the "Cosmetic Directive" 6/768/EEC. A similar scoping is defined in the **EU GPP** scheme which is currently under development;
- **Blue Angel** (Germany) has developed an environmental **labelling** scheme for the product group "**Sanitary Paper Products made of Recycled Paper**", which includes: cleaning rags, handkerchief, kitchen roll, napkin, paper handkerchief, paper towels, sanitary paper, toilet paper;
- "**Sanitary Products**" are also included within the **Nordic Ecolabel/Swan** (Scandinavia) **labelling** system. The product group encompasses disposable products such as breast pads, children's diapers, incontinence care products (panty-liners, formed diapers and diapers with tape strips), sanitary towels (pads and panty-liners), tampons, cotton buds, cotton wool, toothpicks, underlays, draw sheets, bed linen, wash cloths and surgical gowns. Wet wipes, paper handkerchiefs or wash cloths made of paper or multiple use wash cloths and mesh pants are not eligible for a Nordic Ecolabel under these criteria for sanitary products. A similar product categorization was defined for **GPP**, apart from the exclusion of net pants used together with certain incontinence products, incontinence underlay, and draw sheets. The most important criteria relate to the production of the main raw materials (fluff pulp, cotton and various plastic parts).
- **Green Seal** (USA) has established a set of environmental, health, and social requirements for the **labelling** of "**Sanitary paper products**". The product category includes paper towels, general-purpose wipes, paper napkins, bathroom tissue, facial tissue, toilet seat covers, placemats, tray liners, table coverings, and other sanitary paper products. This standard does not include nonwoven sanitary products, general-purpose disposable and flushable wipes containing cleaning agents or fragrances, disposable diapers, or sanitary napkins and tampons.
- **Good Environmental Choice Australia Standard** (Australia) has developed environmental standards which can be used to **label "Sanitary Paper Products"** including toilet paper, facial tissues, paper towels, hand towels and table napkins.

- The **Ecomark** (Japan) eco-labelling scheme deals with "**Sanitary paper products**", defined as tissue paper, toilet paper, and coarse tissue paper (paper towels and other types of sanitary paper are excluded).
- "**Sanitary paper products**" are object also of the **Environmentalchoice** (New Zealand) labelling scheme. The category includes toilet paper, facial tissue, paper towels and table napkins.
- Sanitary products and other medical devices were included in the **EU GPP** Background Product Report on "**Equipment used in the health sector**". The report encompasses:
  - **Sanitary products**, encompassing disposable breast pads, children's diapers, incontinence care products (liners, contoured diapers and diapers with tape strips), sanitary towels (towel and panty liners) and tampons;
  - **Plastic accessories and devices**: peritoneal dialysis, haemodialysis, IV sets, parental nutrition and gloves;
  - Thermometers and sphygmomanometers;
  - X-ray films.
- **GPP** criteria for "**Sanitary Products**" have been developed by **EDANA**, the leading association and voice of the nonwovens and related industries, which is based in Belgium. EDANA deals with absorbent hygiene products (AHP), more specifically, adult incontinence disposable products have been considered.
- **GPP** criteria for "**Sanitary Products**" has been developed also by **Efeko** in Finland. Criteria for sanitary products (disposable diapers/nappies, panty liners, tampons, pads and incontinence care products) are based on the materials content and the waste management of the product.
- Finally, the **Swedish Environmental Management Council** has developed **procurement** criteria for "**Incontinence and Urology Products**", including diapers for children, urination devices, catheters, urine drip collector, urine collector, urine receptacle, suspension and attachment devices for urine collection bags, absorbent aids for incontinence, attachment device for absorbent aids for incontinence.

From the analysis of the Final Report ENV.G.2/SER/2009/0059r "Assessment and Comparison of National Green and Sustainable Public Procurement Criteria and Underlying Schemes", it is moreover apparent that national GPP schemes related to **sanitary paper products** are implemented in most of the countries included in the study (**Austria, Belgium, Denmark, Finland, France, Germany, Netherland, Norway, Sweden, UK**). On the contrary, only **the Scandinavian countries** seem to have implemented, up-to-2010, procurement schemes dealing with incontinence products.

The products identified during the survey as potential candidates for the "Sanitary Products" scope definition have been clustered and reported in Table 1 as groups of homogeneous products.

**Table 1 – Products candidate to fit within the "Sanitary Products" scope**

Products candidate to fit within the "Sanitary Products" scope.	Sanitary Products – Call for Tender Preliminary Scope	EU Ecolabel	Others EL	EU GPP	Others GPP
<i>Bed linen, bedding underlay, draw sheets, underlays</i>	X		NS		
<i>Breast pads</i>	X		NS	X	FI, NS
<i>Cotton buds</i>	X		NS		
<i>Cotton wool</i>	X		NS		
<i>Incontinence care products (diapers, sanitary napkins, panty liners, tampons...)</i>	X		NS	X	Edana, Efeko, NS, SW
<i>Others</i>			GS, NS		Efeko, NS
<i>Plastic accessories and devices</i>				X	
<i>Surgical gowns</i>	X		NS		
<i>Table coverings + placemats + tray liners</i>			GS		
<i>Paper towels/tissues/napkins/rags</i>	X	X	AU, BA, GS, J, NS, NZ	X	NS
<i>Toilet paper/tissue</i>	X	X	AU, BA, J, NZ	X	
<i>Toilet seat covers</i>	X		GS		
<i>Toothpicks</i>	X		NS		
<i>Urination devices (collectors, receptacles, ...)</i>					SW
<i>Wet wipes + wash cloths</i>	X		GS, NS		
<p><b>Legend:</b>  AU: Australian eco-label; BA: Blue Angel; GS: Green Seal; J: Japanese eco-label; NS: Nordic Swan; NZ: New-Zealander eco-label  Gray: considered out of scope based on the costs (complexity) and the benefits (marginal) resulting from the inclusion of the product  Green: considered out of scope because already included in the EU Ecolabel/GPP schemes for "Tissue Paper"  Purple: considered out of scope according to the Ecolabel Regulation (Ecolabel shall not apply to medical devices)  White: candidate product</p>					

## 4. Discussion

No matter the product considered, it is possible to identify a common general function for the **incontinence care products** (to collect body waste streams – i.e. urine, faeces, blood, ... – through physical absorption from persons who cannot autonomously control / take care of their personal hygiene) and the recurring presence of typical materials (mainly fluff pulp and textiles, i.e. natural fibre based materials, and, with a lower extent, polymers). The market of these products appears significant. From the Prodcom database, it was estimated that the production volume in 2009 in EU27 was € 4.25 billions, equivalent to 27% of the overall EU27 Sanitary Paper Products production volume. Figures were collected also for the US market: \$ 4.8 billions in 2001, equivalent to 73% of the US Sanitary Paper Product market, even if the calculation methodology is unknown in this case. Since environmental information about diapers/nappies and napkins/tampons is moreover easily accessible, the aggregate impact generated by incontinence care products in EU27 can be assessed. On the whole, this sub-group should be thus **included** within the scope of Sanitary Products, even if an open issue to be solved later on is related to the inclusion of **disposable and/or reusable products**.

No environmental and EU27 market data on **breast pads** was instead found. The only information found is that the market of "breastfeeding and baby food crockery" in Japan is small, overall equal to one tenth of the Japanese diapers market. The market share of this product within the larger group of "Sanitary Products" could thus be marginal. Nevertheless, composition and functionality of breast pads is very similar to that of incontinence care products so that their **inclusion** in the group would not add any apparently significant complication.

A significant market share is covered by **paper towels and toilet papers**. Nevertheless, they are already inserted in the EU Ecolabel/GPP schemes for Tissue Paper. Since the existing criteria are valid until 2013, the inclusion of these products within the Sanitary Products scope is considered to increase the complexity of the category without leading up to additional effective benefits. The first approach is thus to **exclude** this products from the scope for the time being.

Differently, **wet wipes and wash cloths** are out of the scope of EU Ecolabel/GPP criteria for Tissue Paper and they could thus represent a potential product candidate for the Sanitary Products group. The function of this subgroup is to absorb dirt from human skin surfaces with the additional function of cleaning them. The production volume of wet wipes and cloths in 2009 in EU27 should be one forth of the incontinence care products volume (rough estimation from Prodcom). Other available market data are related to:

1. US, where the market share in 2001 was \$ 168-252 millions (estimation), equivalent to 10-15% of the US market for Sanitary Tissue Paper Products;
2. Japan, where the baby wipes market is lower than the market of "breastfeeding and baby food crockery".

A LCA study on baby wipes is moreover available in the scientific-technical literature. The inclusion of these products within the scope of "Sanitary Products" is however **to be**

**discussed** because it should be allowed only if the fulfilled function, which goes beyond the only collection of human wastes, is considered compatible within the group.

With reference to **medical devices** which have a potential use as sanitary products, they are considered **out of scope** according to the Ecolabel regulation. **Urology products** could be of interest within the GPP scheme, also considering that the market in 2009 in US is estimated to be \$ 2.5 billions, while the production volume of medical catheters in 2009 in EU27 was about € 4 billions (estimation from Prodcom). Nevertheless, their function is different from incontinence care products because they remove, flow and collect human waste streams through the use of plastic devices which are, at least in case of catheters, applied further to surgical interventions for the treatment of human pathologies and malfunctions. Environmental information is moreover scarce: only a study on plastic catheters is available. It is thus proposed to preliminarily exclude them from the scope of Sanitary Products since they would otherwise spread excessively the complexity of the product group. Potential market benefits could be gained within the single GPP scheme but it would make sense to consider them within a **separate product group**.

**Other sub-groups**, the ones highlighted in gray in Table 1, which could, directly or indirectly, fit with the definition of sanitary product are currently considered **out of scope** because the functions they fulfil is considered too much different and because their market quota should be marginal, compared with the one of incontinence care products.

The EIPRO study was also consulted in order to gather information about the single products identified in Table 1. Nevertheless, the level of aggregation of the study did not allow for the collection of detailed information related to the specific products.

## 5. Conclusion

On the basis of the information collected, it is preliminary proposed that the scope of the Ecolabel and GPP schemes for "**Sanitary Products**" refer to products which are:

1. **used for taking care of the personal hygiene through the direct absorption and removal of human body waste streams;**
2. **mainly based on natural fibres** (i.e. wood fibres and textiles).
3. **not yet included in Ecolabel/GPP schemes.**

The following products would fit with the previous definition:

- **Incontinence care products (diapers, sanitary napkins, panty liners, tampons...)**
- **Breast pads.**

The scope is however to be further discussed and refined, also with reference to the possible inclusion of both **disposable and reusable** products or to the necessary exclusion of the disposable ones, which could also fit within the scope of textiles. Moreover, with reference to other products of potential interest:

- The inclusion of **wet wipes and wash cloths** within the group is possible only if the function fulfilled by these products is considered compatible;



- The development of criteria for **urology products** makes sense only within the GPP scheme. A separate product group should be considered in that case.