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# **Development of EU Ecolabel Criteria for Sanitary Products**

## **SCOPING DOCUMENT**

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#### List of Acronyms

AHP absorbent hygiene products

ECNZ Environmental Choice New Zealand

EPD environmental product declaration

EU European Union

GECA Good Environmental Choice Australia

GPP Green Public Procurement

IPTS Institute for Prospective Technological Studies

JRC Joint Research Centre

PCR product category rules

SEMCo Swedish Environmental Management Council

TARIC Tarif intégré des Communautés européennes (Integrated tarif of

the European Union

# 1. BACKGROUND AND INTRODUCTION

The Institute for Prospective Technological Studies (IPTS) delivers scientific and interdisciplinary analyses with the overall goal of supporting the EU policy-making process. In particular, the services of the Sustainable Consumption and Production Unit within the IPTS include providing socio-economic analyses with regards to key aspects of sustainable consumption and performing techno-economic and environmental impact assessment of technologies, products and processes.

The aim of this project is to develop EU Ecolabel criteria for sanitary products. The implementation of this scheme will assist in the reduction of negative impacts of consumption and production on the environment, on human health and natural resources. The project is led by the Joint Research Centre's Institute for Prospective Technological Studies (JRC-IPTS) with the technical support of DEKRA Industrial GmbH together with PE INTERNATIONAL. The built team will carry out the necessary groundwork so that a solid basis for the development of sustainability criteria can be made available for policy-making.

As part of the project, this scoping report focuses on the definition and categorisation of sanitary products. The list of products referred to as 'sanitary products' is long, and definitions and understandings vary widely among people and organisations. Hence, it is of great importance to gain an overview of the different definitions and to narrow down the long list of sanitary products in order to obtain a homogenous product scope for which an appropriate and meaningful set of EU Ecolabel can be developed.

In this report, the varying definitions are presented and discussed (Section 2.1). In Section 2.2 robust selection criteria are developed and explained in order to enable the justification of products to be included in the project scope. The resulting product scope is subject to discussion with stakeholders. In a next step, further investigation will be carried out for the shortlisted sanitary products:.

- Analysis of legislative framework and technical standards;
- Market analysis;
- Technical analysis.

## 2. DEFINITION OF PRODUCT SCOPE

#### 2.1 Overview of definitions of sanitary products

A large number of definitions and categorisations exist for sanitary products. This Section aims to provide a brief overview of different definitions and understandings.

According to the Cambridge Dictionary a product can be described as 'sanitary' if it "...protects health by the removal of dirt and waste, especially human waste" or "...describes the things which are used by women during their period."

Different eco-labelling and green procurement schemes group different products into the category 'sanitary products' or sub-categories such as 'sanitary paper products' or 'absorbent hygiene products'. For example, the **Blue Angel** includes eight different products in 'sanitary paper products', i.e. cleaning rags, handkerchiefs, kitchen roll, napkins, paper handkerchiefs, paper towels, sanitary paper and toilet paper.<sup>2</sup>

The **Nordic Swan** explicitly only includes disposable products in their labelled product group 'sanitary products', which came into existence due to the amalgamation of two individual eco-labelled groups, namely 'disposable diapers' and 'female sanitary products'. The products include 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. The Nordic Swan label excludes wet wipes, paper handkerchiefs, wash cloths made of paper or textile materials, and mesh pants for use together with certain sanitary products from the label under this product group. Any products containing medications/medicine, disinfectant substances and the like are also ineligible.<sup>3</sup>

In contrast, the U.S. eco-labelling scheme **Green Seal** includes quite a different list of product under the term 'sanitary paper products', i.e. paper towels, general purpose wipes, paper napkins, bathroom tissue, facial tissue, toilet seat covers, place mats, tray liners, table coverings and others. Non-woven sanitary products, general purpose disposable and flushable wipes containing cleaning agents or fragrances, disposable diapers or sanitary napkins and tampons are explicitly excluded.<sup>4</sup>

Similarly, the Australian eco-label **Good Environmental Choice Australia (GECA)** applies its Standard to all categories of sanitary paper products including toilet paper, facial tissues, paper towels, hand towels and table napkins.<sup>5</sup> The closely related **Environmental Choice New Zealand (ECNZ)** Standard includes the following products under the relevant sanitary paper product scheme: toilet paper, facial tissue, paper towels and table napkins.<sup>6</sup>

The Japanese eco-labelling scheme **Ecomark** deals with sanitary paper products as well, but only includes tissue paper, toilet paper and coarse tissue paper; paper towels and other types of sanitary paper are excluded.<sup>7</sup>

The **Swedish Environmental Management Council (SEMCo)** has developed procurement criteria for a group of products they call 'Incontinence and Urology Products'. They include diapers for children as well as products referred to in the Standard ISO 9999, namely urination devices, catheters, urine drip collector, urine collectors, urine receptacles, suspension and attachment devices for urine collection bags, absorbent aids for incontinence, attachment device for absorbent aids for incontinence.<sup>8</sup>

Guidelines for the procurement of 'green' sanitary products have also been developed by the Finnish organisation **Efeko Ltd.**. They include disposable nappies, panty liners, tampons, pads and incontinence care products.<sup>9</sup>

The organisation supervising the certification of **Environmental Product Declarations** (EPDs), Environdec, approved the development of Product Category Rules (PCRs) for two distinct product groups which could both be included within the definition of 'sanitary products'. One PCR exists for **absorbent hygiene products (AHP)**, a subset of products from UN CPC/division 32/subclass 32193, which consist of a) feminine sanitary protection products, i.e. sanitary towels, sanitary napkins, panty liners, panty shields and tampons; b) baby diapers, i.e. baby diapers, pant diapers, training pants and swimming pants and c) adult incontinence products, i.e. all-in-one products containing both the absorbent core and the outer shell with fastening, insert pads and pants/briefs, liner pads, male pouches, bed protection and underpads. Products such as toilet paper, handkerchiefs, towels, serviettes and articles of apparel, paper pulp, paper and cellulose wadding or webs of cellulose fibres are excluded within the AHP PCRs but covered in the second set of PCRs for **tissue products**. The following characteristics apply for this group of products:

- o products must consist of at least 90% fibres, virgin or recycled;
- sheets, rolls, tissue paper fit for use for personal hygiene, wiping, cleaning, absorption; and
- o laminated tissue products and wet wipes are excluded.

The industry association of non-woven materials, EDANA, was closely involved in the development of the EPD PCRs for AHPs and tissue paper. However, in 2008 EDANA developed a proposal of GPP criteria for sanitary products in which they only include disposable AHPs for incontinence care as characterised in the ISO 15621 Standard.<sup>12</sup>

Criteria for the procurement of incontinence products have been also developed by the **Agency for Public Management and eGovernment (Difi)** on behalf of the Norwegian Department of Environment. 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.

From the above it can be concluded that the definitions for sanitary products and whether certain products are included or not vary widely. As a result and for the purpose of defining a product scope suitable for the development of EU Ecolabel criteria, it is recommended that selection criteria are developed, by which the process of choosing products to be included in the product scope is made transparent and defensible. The next Section intends to provide such a selection criteria framework.

#### 2.2 Criteria for the definition of the product scope

This Section should be read in conjunction with the MS Excel spreadsheet 'IPTS Product Criteria Matrix Sanitary Products\_v1.0' which accompanies this document. The product criteria matrix is also illustrated in Annex I. In the matrix, an extensive list of products is given (row 3) which was compiled by scanning the various documents referred to in Section 2.1. The matrix also shows the various selection criteria (columns C and D) which were developed with the aim of categorising the various products and ultimately of defining the product scope for this project. The selection criteria are presented and discussed in the following. After each criterion, a recommendation is given as to whether certain products shall be excluded or included in the product scope for this project.

#### Criterion 1: Coverage under existing EU Ecolabelling Scheme

Products which are already covered within the existing EU Ecolabelling scheme are considered out of scope for this product group (criterion 1, row 5). An EU Ecolabel already exists for tissue paper (Directive 2009/568/EC). Article 1 of the Directive states that "the product group 'tissue paper' shall comprise sheets or rolls of tissue paper fit for use for personal hygiene, absorption of liquids and/or cleaning of soiled surfaces. The tissue product consists of creped or embossed paper in one or several plies. The fibre content of the product shall be at least 90 %." Article 1 further indicates that a) wet wipes and sanitary products, b) tissue products laminated with other materials than tissue paper and c) products as referred to in the Cosmetics Directive (76/768/EEC) are excluded.

Another EU Ecolabel also exists for textile products.<sup>15</sup> Accordingly, some further products can be excluded, since "textile products for interior use consisting of at least 90% by weight of textile fibres" are included in this label.

**Recommendation regarding criterion 1:** Products such as facial tissues, cleansing tissues, kitchen rolls, paper towels, tissues, napkins, rags, tissue papers, handkerchiefs toilet paper and tissue sheets/rolls as well as bed linen, cleaning rags, draw sheets and wash cloths are NOT part of the product scope for sanitary products due to being covered under existing EU Ecolabel schemes.

In accordance with the recommendation regarding criterion 1, the respective products are highlighted in red in the product criteria matrix. It is important to note that the

abovementioned restriction only applies to products covered by the EU Ecolabel (EU Flower) and is not to be confused with products included in other existing ecolabelling schemes (e.g. Blue Angel, Nordic Swan, etc.). Nevertheless, the product criteria matrix also shows as additional information which particular sanitary products are included in other labelling schemes.

## Criterion 2: Products to be included due to categorisation of products in other ecolabelling schemes

Selection criterion 2 aims at reflecting the decisions of other eco-labelling schemes with regards to including or excluding certain products from a defined product scope.

As mentioned in Section 2.1, EPD PCRs were developed for two main groups of sanitary products, i.e. AHPs and tissue products. The two main distinctive features for products in these two groups are the content of paper pulp and the ability of products to absorb liquid human waste streams. For the tissue products, it was defined that the paper pulp content must be at least 90%. Preliminary research for AHPs shows that the paper pulp content is typically less than 60% (adult incontinence products) and can be close to only 40% in children's diapers. For AHPs, other materials such as superabsorbents and different kinds of polymers make up the remaining share of raw materials reflecting the focus on the products' absorptive capacities. The paper pulp content as the distinctive feature was also used by the EU Ecolabel for tissue paper. 13

From the definitions of sanitary products as presented in Section 2.1 one notices that other eco-labelling schemes either focus on diapers/incontinence products (i.e. products with high absorptive capacity) or on products with high paper pulp content which is then often called 'sanitary PAPER products'. For example, the Nordic Swan and Efeko include products such as diapers, incontinence care products and others, whereas most other labels, i.e. Blue Angel, GECA, ECNZ, Ecomark and Green Seal include only products with a high paper pulp content.

**Recommendation regarding criterion 2:** It is in line with other ecolabelling schemes to distinguish between products that feature high absorptive capacities and products which have a high paper pulp content. Since the latter group of products is excluded due to criteria 1, the product scope for this project should focus on the former group.

Both in the EPD PCRs and in the EDANA sustainability report, the group of products that possess high absorptive capacities are called AHP and include three main product sub-groups, i.e. feminine sanitary protection products, baby diapers and adult incontinence products. <sup>10</sup>, <sup>17</sup>

Although not explicitly included in the EPD PCR or EDANA scope for AHP, it seems recommendable to include also breast pads into the product scope of this project. This is supported by the following reasons: a) The Nordic Swan includes breast pads into

their sanitary products category; b) breast pads are a product with an estimated high sales volume and c) breast pads possess very similar characteristics to AHPs (see also criterion 3).

According to the above, the AHP are highlighted green in the product criteria matrix.

#### Criterion 3: EU Ecolabel requirements and typical characteristics of products suggested for the product group sanitary products

In Article 3.1 of the EC Regulation 66/2010 it is stated that a "'product group' means a set of products that

- a) serve similar purposes and
- b) are similar in terms of use, or have similar functional properties, and
- c) are similar in terms of consumer perception" 18

According to this requirement, it is important to only include products which have similar attributes in the abovementioned aspects. Only if similar characteristics of products in the same product group can be ensured, is it possible to develop a set of criteria which strike a balance between comprehensively reflecting the environmental performance of the products along their life cycle and being simple and easy to understand for all stakeholder groups involved, as also stated in paragraph 5 of the EC Regulation 66/2010: "Those criteria should be simple to understand and to use..." 18

According to this principle and in order to develop a comprehensive and easy to understand set of criteria, the products to be included in the product scope should have similar characteristics. Analysing the products identified through criterion 2, the following typical characteristics can be described:

- a) all products fulfil a similar purpose, which could be described as the collection of human body waste streams by acting as a physical absorbent during prolonged and direct contact with the human body;
- b) all products are made of similar raw materials;
- c) all products are designed to be disposed immediately after use; and
- d) all products possess similar waste management scenarios.

Recommendation regarding criterion 3: Products within the product scope should have similar characteristics in terms of their purpose, use, functional properties and consumer perception. The products to be included in the product scope should possess the abovementioned characteristics.

Applying this criterion, the products listed in the Table 1 should be excluded from the product scope (highlighted in red in the product criteria matrix).

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Table 1. Out-of-scope products according to criterion 3

Excluded product	Reasons considered in support of the exclusion
	a) products do not fulfil similar purpose;
	b) products are not made of similar raw materials;
	c) products are not designed to be disposed after use;
	d) products possess different waste management scenarios
- breast wipes	a)
- cotton buds/pads	a), b), d)
- cotton wool	a)
- facial tissue	a)
- hand towels, paper towels, tissues, napkins, rags, kitchen roll	a)
- mesh/net pants	a), c), d)
placemats, table coverings, table napkins, tray liners	a)
- plastic accessories and devices	a), b), c), d)
- all kinds of sanitary/toilet paper	a), b)
- surgical gowns	a), d)
- toilet seat cover	a)
- tooth picks	a), b)
- underlays	a), c)
urination/urology     devices (other than     diapers)	b), d)
- wet wipes	a), b), d)
- other wipes	a)

According to criterion 3, the following products named in the product criteria matrix should be thus **included** (highlighted in green):

- all kinds of diapers
- all kinds of sanitary pads and panty liners
- all kinds of tampons
- breast pads

It should be noted that the key distinctive features of products identified through criterion 3 is their absorptive capacity through **direct** and prolonged contact with the human body. Accordingly, bedding underlay is excluded since the absorption of bodily waste streams takes place away from the human body.

As noted under criterion 2, it is recommended to include breast pads into the project scope due to their very similar characteristics in comparison to other products identified through criterion 3.

## Criterion 4: Market volume of certain groups of sanitary products and respective potential environmental benefits

The EU Ecolabel Regulation (EC 66/2010) states that the scheme intends to achieve a significant reduction of environmental impacts through the use of the EU Ecolabel.<sup>1</sup> Consequently, it is highly likely that the overall environmental benefits of ecolabelling a particular product increase in line with the scale of production and consumption of a given product. Annual sales data for the EU27 for sanitary products are presented in Table 1. The data are split into two main groups (the respective general PRODCOM category is called 'manufacture of all household and sanitary goods and of toilet requisites' (NACE 17.22):<sup>18</sup>

- a) products with the CPA code 17.22.11, i.e. toilet paper, handkerchiefs, cleansing or facial tissues and towels, tablecloths and serviettes, of paper pulp, paper, cellulose, wadding or webs of cellulose fibres and
- b) products with the CPA code 17.22.12, i.e. sanitary towels and tampons, napkins and napkin liners for babies and similar sanitary articles and articles of apparel and clothing accessories, of paper pulp, paper, cellulose wadding or webs of cellulose fibres.

Since the first group of products was excluded from the scope according to criterion 1, the analysis of the sales data for the second group shows that the products with the highest sales volumes are baby diapers (65%) followed by sanitary pads and tampons (13%), see Table 2. Wadding and articles made of wadding forms all together 9% of the total volume. According to TARIC codes "wadding and articles of wadding [are] impregnated or coated with pharmaceutical substances or put up in forms or packings for retail sale for medical, surgical, dental or veterinary purposes." Due to these purposes, these articles are excluded from the product scope (see criterion 5 for details). For completion purposes, 13% of the sales come from other products that are not further specified.

Table 2. PRODCOM sales data for sanitary products<sup>20</sup>

PRODCOM Code	Description	Annual sales volume 2010 in M€	% of overall sales volume	% of remaining sales after application of criterion 1
17.22.11.20	Toilet paper	5,439	31%	excluded
17.22.11.40	Handkerchiefs and cleansing or facial tissues of paper pulp, paper, cellulose wadding or webs of cellulose fibres	986	6%	excluded
17.22.11.60	Hand towels of paper pulp, paper, cellulose wadding or webs of cellulose fibres	2,628	15%	excluded
17.22.11.80	Tablecloths and serviettes of paper pulp, paper, cellulose wadding or webs of cellulose fibres	1,329	8%	excluded
17.22.12.10	Sanitary towels and tampons, napkins and napkin liners for babies and similar sanitary articles, of wadding	121	1%	2%
17.22.12.20	Sanitary towels, tampons and similar articles of paper pulp, paper, cellulose wadding or webs of cellulose fibres	869	5%	13%
17.22.12.30	Napkins and napkin liners for babies and similar articles of paper pulp, paper, cellulose wadding or webs of excluding toilet paper, sanitary towels, tampons and similar articles	4,522	26%	65%
17.22.12.40	Wadding; other articles of wadding	584	3%	7%
17.22.12.50	Articles of apparel and clothing accessories of paper pulp; paper; cellulose wadding or webs of cellulose fibres (excluding handkerchiefs, headgear)	32	0%	0%
17.22.12.90	Household, sanitary or hospital articles of paper, etc, n.e.c.	884	5%	13%
	TOTAL	17,394	100%	100%

This preliminary and quantitative screening was aimed at highlighting clusters of products characterized by a large-market-share. A limited portion of the basket of products listed in the matrix was analyzed. However, it is likely that some of the other products do not have high sale volumes and that the environmental labelling of these products would thus produce only marginal benefits. .

**Recommendation regarding criterion 4:** According to EU27 sales data, there is strong support towards focussing on baby diapers and sanitary napkins as well as similar products belonging to the relevant PRODCOM categories for inclusion into the product scope for this project. In contrast, several products can be considered a minority product and should be excluded from the product scope.

The products included through criterion 4 are highlighted in green in the product criteria matrix, while products supposed to cover a marginal share of the market are highlighted in red. It should be noted that due to the high level of aggregation in the PRODCOM Statistics, only the main products that can be clearly identified through the PRODCOM Code are highlighted.

## Criterion 5: Products to be excluded from EU ecolabelling scheme due to legislation

Article 2.2 of the EU Ecolabel Directive stipulates that the EU Ecolabels shall not be applied to "...medicinal products for human use, as defined in Directive 2001/83/EC...or for veterinary use, as defined in Directive 2001/82/EC, nor to any type of medical device". In accordance with WHO, incontinence could be considered a disease, and not a natural condition, after an age of 5 years. Consequently, all incontinence products should be considered medical devices and excluded from EU Ecolabelling initiatives.

**Recommendation regarding criterion 5:** Due to regulatory restrictions, incontinence products should be excluded from the product scope for the EU Ecolabel but could be included for the potential development of GPP guidelines.

It would be interesting to understand from stakeholders if they agree with this restriction or if they find any possibility to include also incontinence products within the scope of the EU Ecolabel.

In accordance with the recommendation regarding criterion 5, products that fall under the medical Directive and cannot be included in the EU Ecolabel product scope It would be interesting to understand from stakeholders if they agree with this restriction or if they find any possibility to include also incontinence products within the scope of the EU Ecolabel.

#### 2.3 Conclusion

In conclusion the project team proposes to include the following products in the product scope of the EU Ecolabel:

- all kinds of children's diapers
- all kinds of sanitary pads/napkins and panty liners
- all kinds of tampons
- breast pads

This product scope is highlighted in green in the product criteria matrix (row 3) and further explained in the following. According to the exclusion criterion 1, only those

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products which are not yet covered by any existing EU Ecolabel schemes can be included in the product scope, Certain products that resemble key characteristics of products with a high paper pulp content as well as products considered 'textiles' are excluded.

Due to the main distinction between sanitary products with a high paper pulp content (sanitary paper products) and sanitary products with absorptive capacities (AHP), it is recommended to follow the product scope defined for the AHP group. Following the recommendation of the Nordic Swan Ecolabel and due to the fact that the product characteristics of breast pads are very similar to those of the AHP, breast pads should also be included.

Owing to the requirement that products within the product scope should possess similar characteristics and based on the analysis of the common main features of the products identified through criteria 2, further reasons for the inclusion and exclusion of certain products were collected (criterion 3). In this context it should be noted that it is recommended to exclude reusable diapers from the product scope for the following main reasons: a) 95% of families in the EU use disposable diapers<sup>18</sup>, b) disposable diapers are rated "...the second greatest improvement in contemporary life (the first being the automatic washing machine)" by survey respondents with children<sup>21</sup>, c) the raw materials used as well as the waste management scenarios are very different and d) the types of environmental impacts are different compared to disposable diapers. Other ecolabelling schemes, e.g. Nordic Swan have also excluded reusable diapers.

EU27 sales data for sanitary products revealed that particularly baby diapers and sanitary napkins have high sales volumes. Hence, it can be concluded that all together these products could be responsible for a large amount of environmental impact and should therefore be included in the product scope for this project. The product criteria matrix also indicates which products presumably are of negligible relevance and hence should be excluded from the product scope.

It would be interesting to understand from stakeholders if they agree with this restriction or if they find any possibility to include also incontinence products within the scope of the EU Ecolabel.

Finally, it should be noted that the majority of the products (especially when considering product volumes) are aimed at the end consumer. Hence, provided that a suitable set of sustainability criteria can be determined, labelling the defined products with an EU flower can be expected to be a powerful tool for reducing the environmental impact caused by these products while effectively promoting the EU Ecolabel at the consumer level.

#### Annex I

	Alliex																						
	PRODUCTS																						
#	CRITERIA	Bed linen	Bedding underlay	Breast pads (disposable)	Breast wipes	Cleaning rags	Cotton buds	Cotton pads	Cotton wool	Draw sheets	Diapers / nappies (children)	Diapers (incontinence)	Diapers formed (incontinence)	uption tincontinence)	Diapers w tape strips (incontinence)	Facial tissue / cleansing tissue	Hand towels	Kitchen roll	Mesh / net pants	Paper towels / tissues / napkins /	Placemats	Plastics accessories & devices	Sanitary paper
												GIO		pers	ence								
1	Covered under existing eco labels																						
	EU Flower	✓				✓				✓						✓		<b>✓</b>		✓			
	Blue Angel (Germany)					✓												✓		✓			✓
	Nordic Swan (Scandinavia)	✓		✓			✓		✓	×	✓	✓	✓		✓				×				✓
	Green Seal (USA)	✓		✓			✓		✓	✓	✓		✓		✓								✓
	Good Env Choice (Australia)															✓	✓			✓			
	Ecomark (Japan)																		×				
	Env Choice (New Zealand)															✓				✓			
2	Products to be inlcuded due to categorisation of products in other ecolabelling schemes																						
3	EU Ecolabel requirements and typical characteristics of products suggested for the product group sanitary products  a) products fulfil a very similar function: the direct absorption (and removal) of human body waste streams b) products are made of similar raw materials c) disposable product d) products possess similar waste management options															Legend  = product included in study (both GPP and Eco Lal = product excluded in Eco Label but included in GF = out of scope (both GPP and Eco Label)  = product included in Eco Label scheme  x = product explicitely excluded in Eco Label scheme							
4	Priority products identified through PRODCOM sales data and minority products																						
5	Products to be excluded from EU ecolabelling scheme due to legislation																						

#	CRITERIA	Sanitary towel / napkin	Sanitary pads	Panty liners		: sanitary napkin (incontinence)	y pads	Surgical gowns	Table coverings	Table napkin	Tampons	Tampons (incontinence)	Tissue paper / handkerchief	Toilet paper (bathroom) tissus	Toilet seat covers	$ au_{ ext{Oothpicks}}$	Tray liners	Underlays	Urination devices	Urology products (others than diapare)	Wash cloths	Wet wipes	Wipes (general purpose)
1	Covered under existing eco labels																						
	EU Flower												✓	✓							✓	×	
	Blue Angel (Germany)	<b>✓</b>											✓	✓									
	Nordic Swan (Scandinavia)	✓	✓	✓	✓			✓			✓		×			✓		×			✓	×	
	Green Seal (USA)			✓	✓			✓			✓		×			✓		✓			<b>✓</b>	×	
	Good Env Choice (Australia)									✓				✓									
	Ecomark (Japan)	×											✓	✓									
	Env Choice (New Zealand)									✓				✓									
2	Products to be inlcuded due to categorisation of products in other ecolabelling schemes																						
3	EU Ecolabel requirements and typical characteristics of products suggested for the product group sanitary products a) products fulfil a very similar function: the direct absorption (and removal) of human body waste streams b) products are made of similar raw materials c) disposable product d) products possess similar waste management options															Legend  = product included in study (both GPP and Ec = product excluded in Eco Label but included i = out of scope (both GPP and Eco Label)  ✓ = product included in Eco Label scheme  x = product explicitely excluded in Eco Label sc							P)
4	Priority products identified through PRODCOM sales data and minority products																						
5	Products to be excluded from EU ecolabelling scheme due to legislation																						

#### **RFFFRFNCFS**

1 Cambridge Dictionary Onli

<sup>1</sup> Cambridge Dictionary Online: search term 'sanitary'; http://dictionary.cambridge.org/dictionary/british/sanitary; accessed 26.01.2012

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