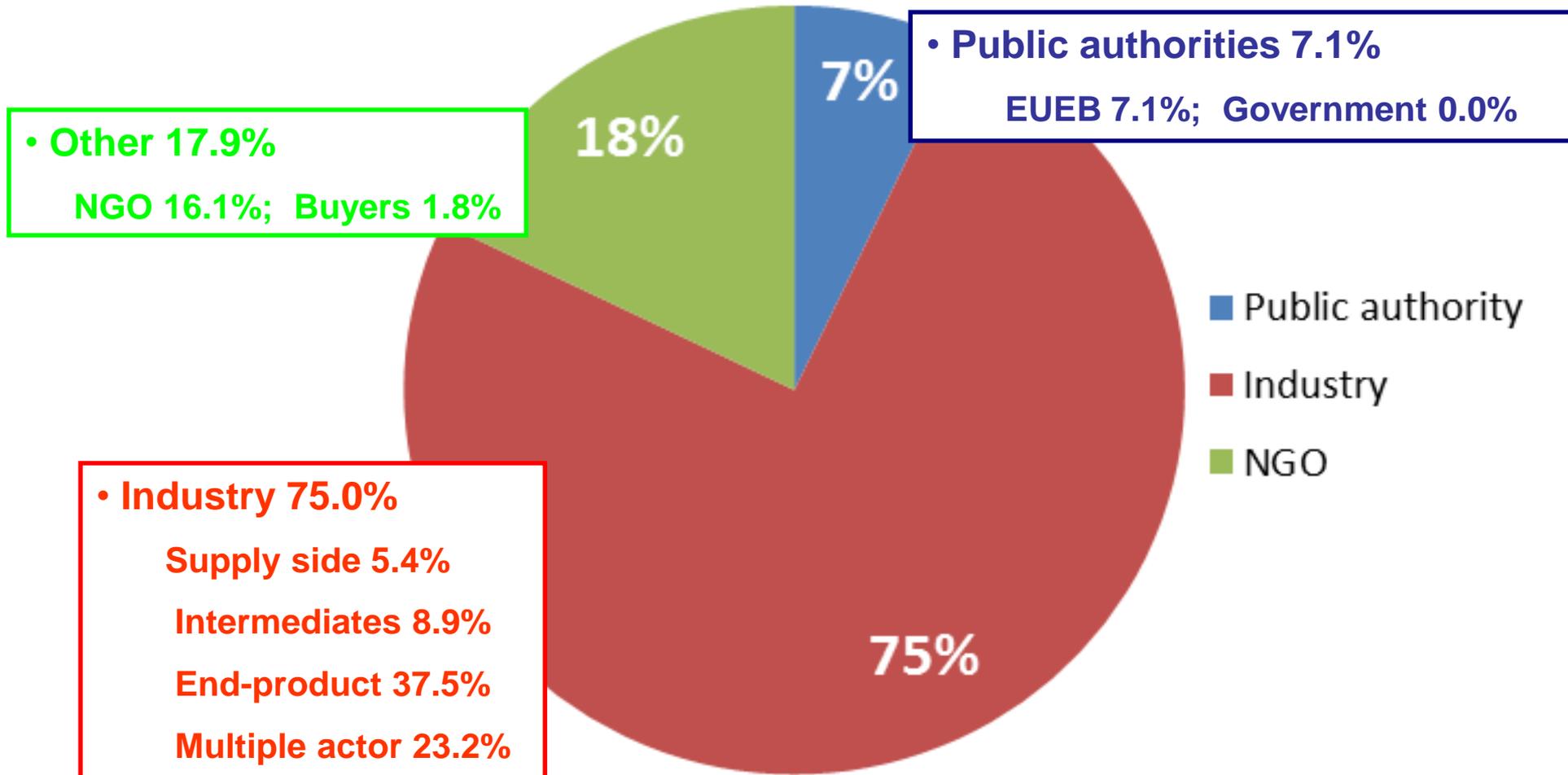


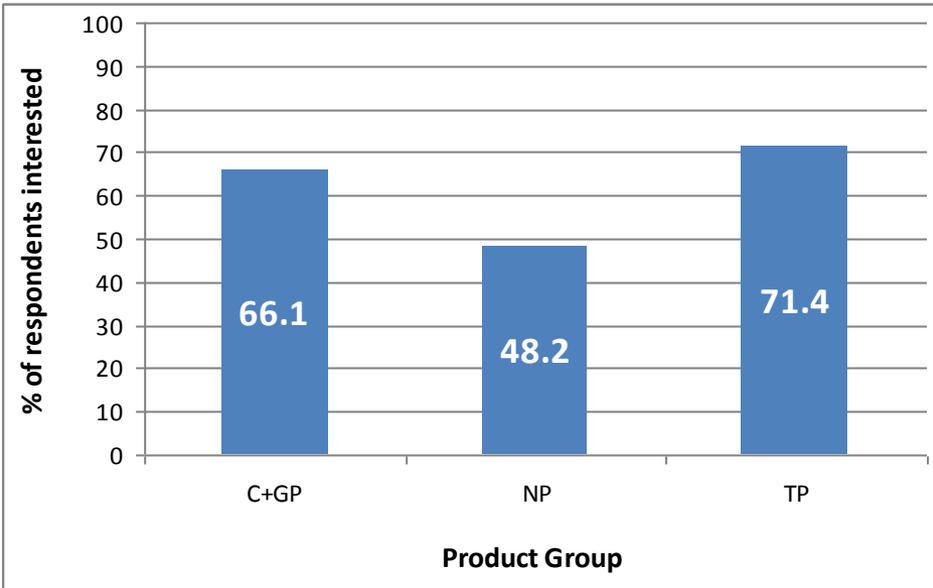
Results of stakeholder questionnaire:

- Stakeholder profiles
- Scope and definitions
- Emissions to air and water
- Hazardous substances
- Energy use
- Sustainable fibre sourcing

Stakeholder profiles (56):

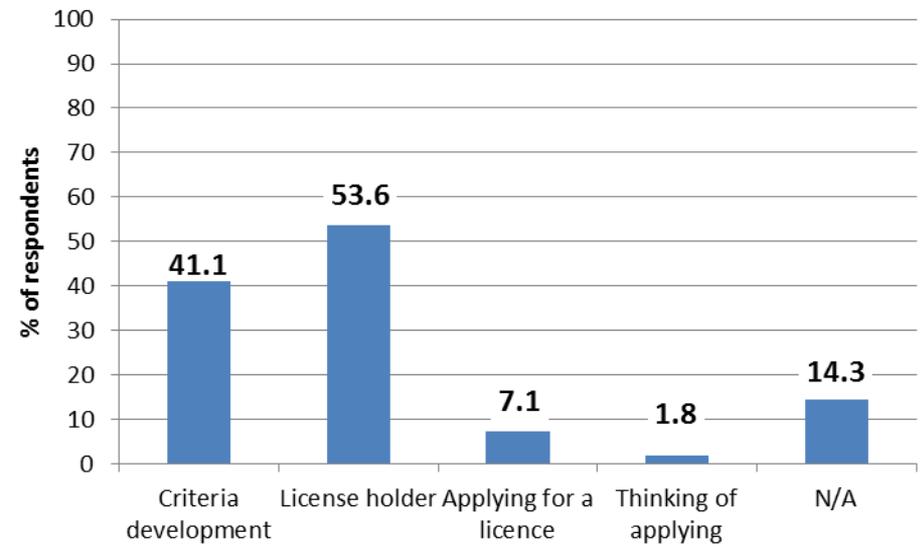


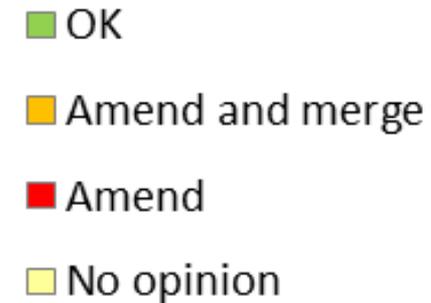
Stakeholder profiles:



- All 3 groups of interest >48%
- Popularity TP > C+GP >> NP

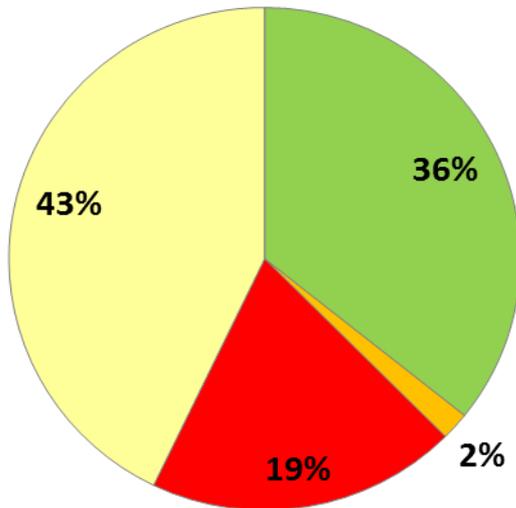
- Lot of license holders responding
- Previous experience with criteria



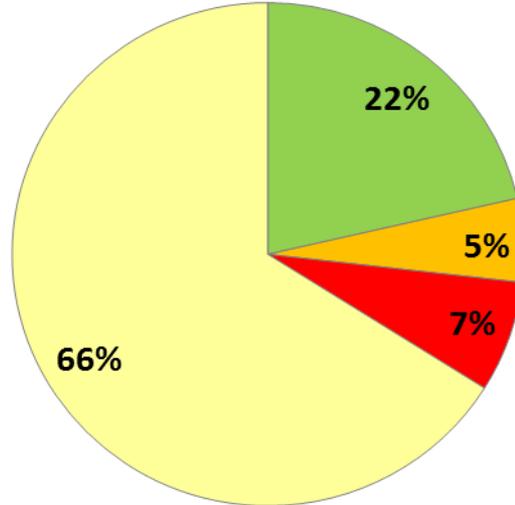


Scope and definitions:

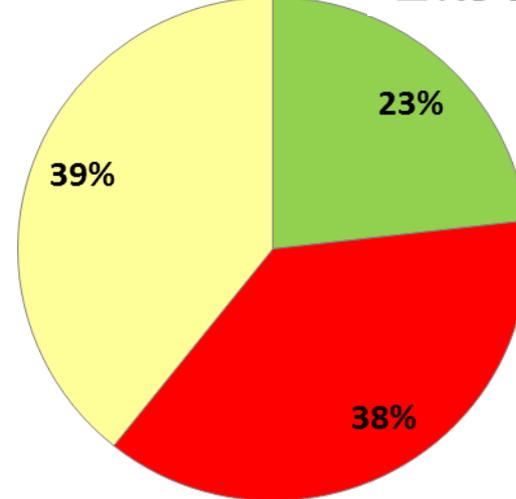
C+GP



NP

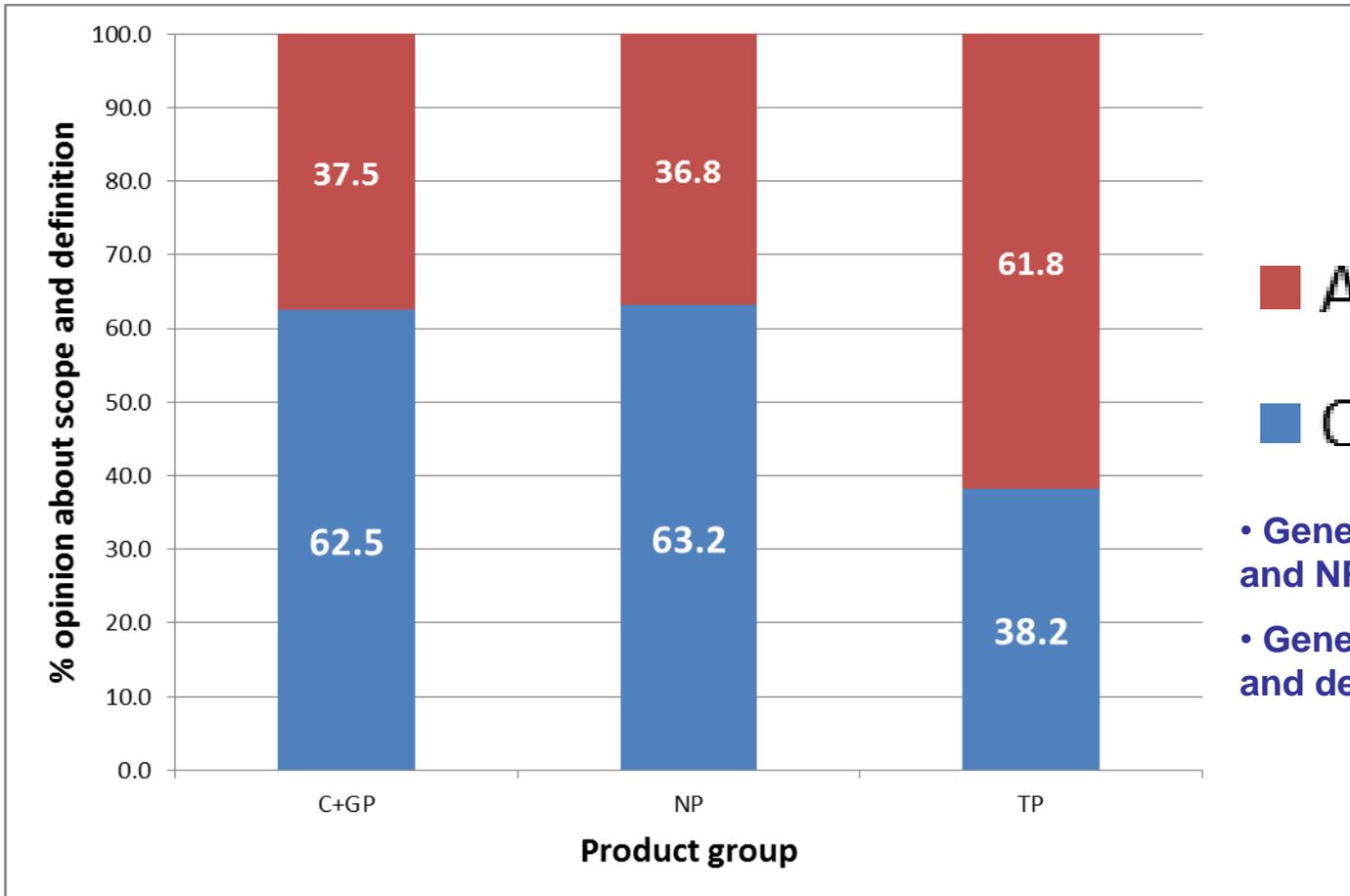


TP



- Not much opinion about NP scope and definition
- Generally in favour of the C+GP scope and definition
- Generally against the TP scope and definition

Scope and definitions (non-neutral opinions only):

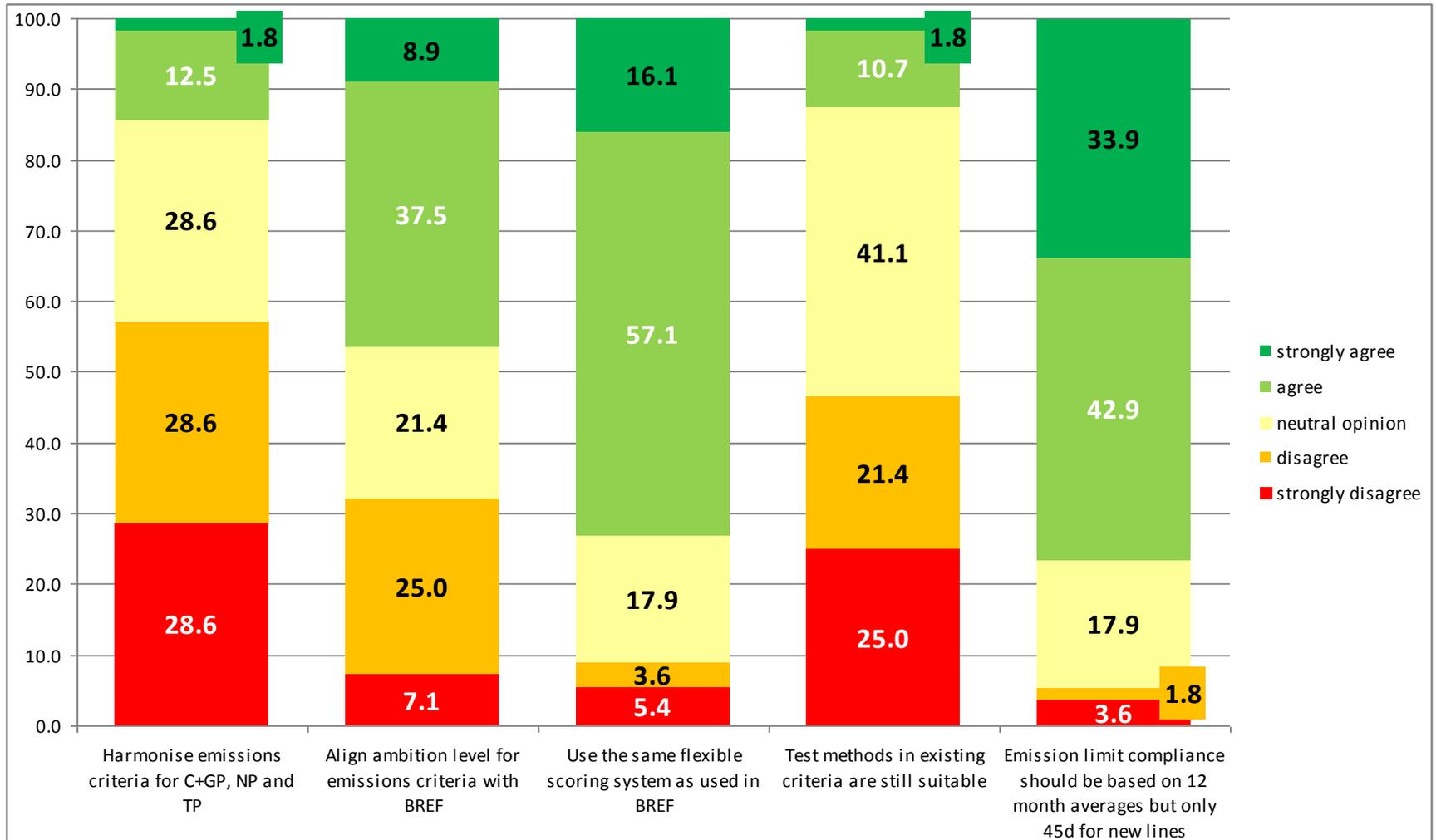


Amend

OK

- Generally in favour of the C+GP and NP scope and definition
- Generally against the TP scope and definition

Emissions to air and water:



Emissions to air and water:

- Significant non-neutral opinions expressed about all five statements criteria (>70%) except #4 (58.9%).
- Ignoring “*no opinions*”
 - Statement #1: **highly -ve** (14.3% +ve VS. 57.2% -ve)
 - Statement #2: **+ve** (46.4% +ve VS. 32.1% -ve)
 - Statement #3: **highly +ve** (73.2% +ve VS. 9.0% -ve)
 - Statement #4: **highly -ve** (12.5% +ve VS. 46.4% -ve)
 - Statement #5: **highly +ve** (76.8% +ve VS. 5.4% -ve)

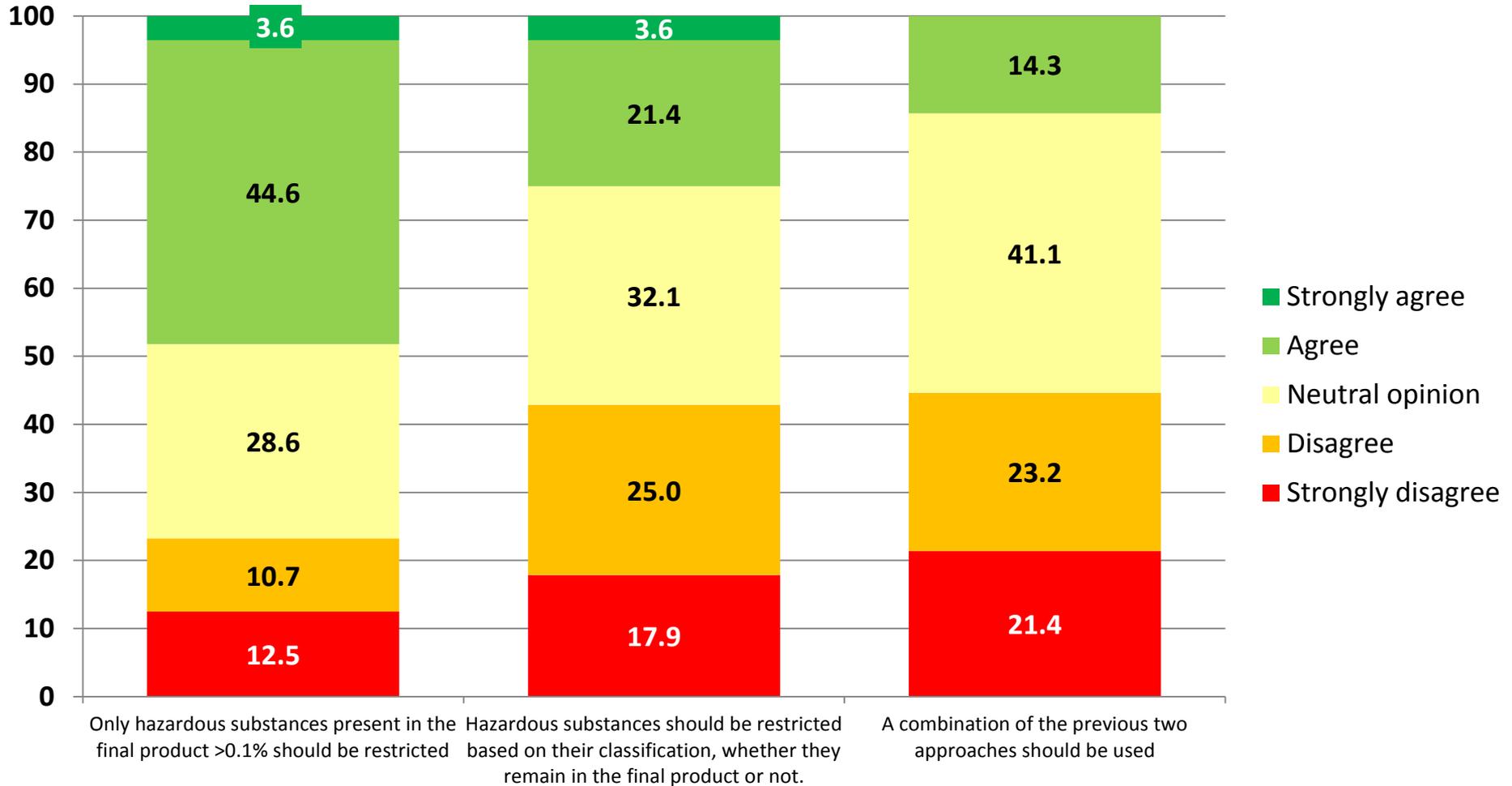
General feedback about Emissions to air and water:

- Emission limits should **NOT align** for TP and C+GP
- **Some support** to align ambition level with BREF, but with lowest limits
- **Lot of support** to use same flexible scoring system as BREF
- Standard test methods **need to be updated** and equivalence allowed
- **Lot of support** for compliance to be based on 12 month averages for established plants and 45 days for new or upgraded plants / production lines.

Specific comments on emission criteria:

- *Suggested to keep the flexible scoring system and use lowest BREF values as reference.*
- *Test methods need to be updated and national equivalent standards allowed (as specified in permits for mills).*
- *EU Ecolabel values need to be updated to match BREF*
- *Preference to address energy use by a criterion on total CO₂ emissions instead.*
- *Limits for P could be tailored based on wood source used (e.g. hardwood, softwood or eucalyptus pulps).*

Hazardous substances:



Hazardous substances:

- Not so many non-neutral opinions for all three statements on this subject (none >71%).
- Strange because this is always a big discussion topic later.
- Ignoring “*no opinions*”
 - Statement #1: **very +ve** (48.2% +ve VS. 23.2% -ve)
 - Statement #2: **very -ve** (25.0% +ve VS. 42.9% -ve)
 - Statement #3: **v.v.very -ve** (14.3% +ve VS. 44.6% -ve)

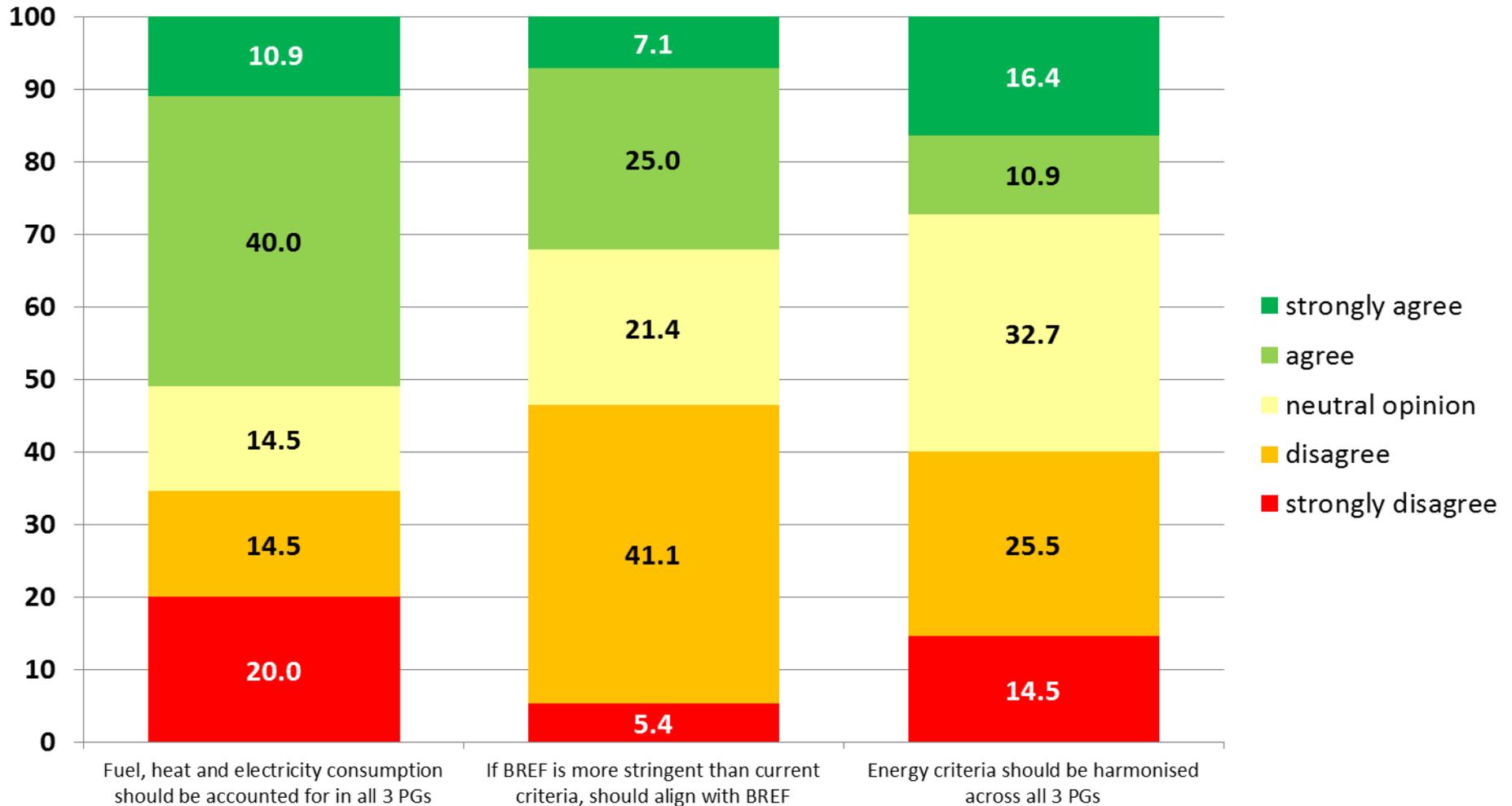
General feedback about hazardous subs.:

- Overall support for restriction to be targeted at substances that remain in the final product.
- Stakeholders against criteria to restrict substances and mixtures based on their classification only.
- Stakeholders even more against a combined approach.
- Several stakeholders were confused about the questions, may be a reason for the high % of "neutral opinion" answers.

Specific comments about hazardous subs.:

- *Desire for TCF free paper and biodegradable complexing agents and no derogations for R40, R63 or R68.*
- *Derogation for DTPA cited as necessary due to lack of alternatives.*
- *Concerns about blue dyes highlighted (e.g. Copper Phtalocyanine).*
- *Big changes to existing criteria approach are NOT welcome unless these are simplifications – existing criteria are already considered difficult.*

Energy use:



Energy use:

- Most non-neutral opinions about statement #1 (85.5%), then statement #2 (78.6%) then statement #3 (67.3%).
- Ignoring “*no opinions*”
 - Statement #1: **very +ve** (50.9% +ve VS. 34.5% -ve)
 - Statement #2: **very -ve** (32.1% +ve VS. 46.5% -ve)
 - Statement #3: **very -ve** (27.3% +ve VS. 40.0% -ve)

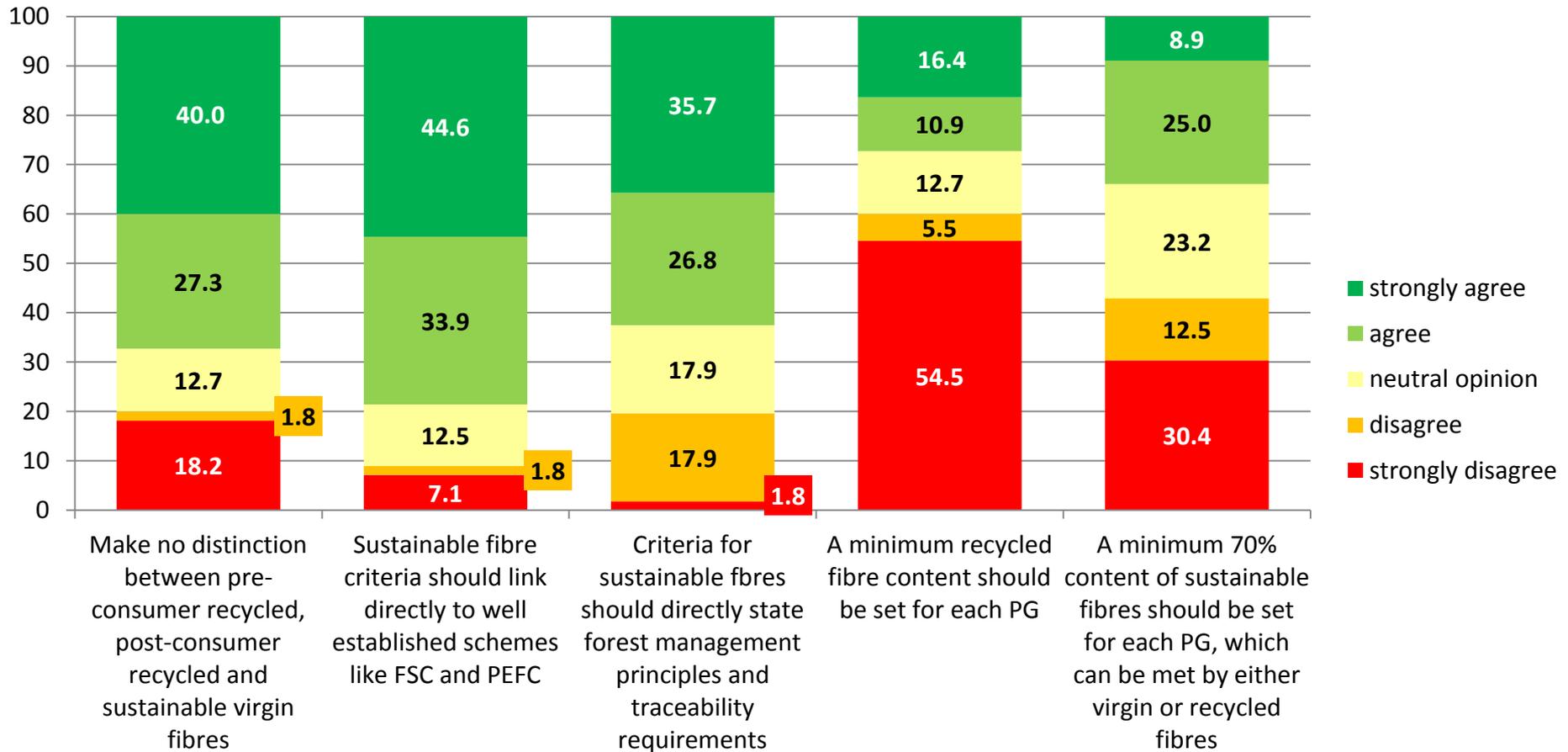
General feedback about Energy use:

- Fuel, heat and electricity consumption need to be accounted for in the criteria somehow.
- Reservations about aligning with BREF
- Lack of support for identical limits for different PGs.

Specific comments on energy use:

- *Uncomfortable with BREF alignment because it sets ranges, not single values.*
- *EU Ecolabel should never be below BREF for EU producers for legality, low ambition to simply align.*
- *TWG for BREF had problems with poor data quality*
- *Preference to address energy use by a criterion on total CO2 emissions instead.*
- *Actual values should be different for different PGs.*

Sustainable fibre criteria:



Sustainable fibres:

- A lot of non-neutral opinions for all five statements on this subject (all >76%).
- Ignoring “*no opinions*”
 - Statement #1: **v.v.very +ve** (67.3% +ve VS. 20.0% -ve)
 - Statement #2: **ultra +ve** (78.5% +ve VS. 8.9% -ve)
 - Statement #3: **v.v.very +ve** (62.5% +ve VS. 19.7% -ve)
 - Statement #4: **very -ve** (27.3% +ve VS. 60.0% -ve)
 - Statement #5: **quite -ve** (33.9% +ve VS. 42.9% -ve)

General feedback about sustainable fibres:

- Pre- and post-consumer fibres **should** be considered as equivalent to virgin fibres from sustainable sources.
- Schemes like FSC and PEFC **must** be recognised.
- SFM principles **should** be directly referenced in criteria.
- **Not a good idea** to state minimum recycled contents for each PG.
- Overall **-ve reaction** about setting a minimum 70% limit for "sustainable fibre content".

Specific comments on sustainable fibres:

- *A minimum recycled content should be nuanced, i.e. at least 90% for NP is okay, at least 70% for TP is okay, but allowance should be made for low pop. density countries which do not have lots of recycled paper available to instead use 100% sustainable virgin fibre.*
- *Should make allowance for controlled wood.*
- *No extra efforts should be required by EU Ecolabel if FSC or PEFC is already complied with.*
- *Recycled content for NP + GP is okay, but not for TP + CP.*
- *Want a direct link to the EN 643 standard.*