



# **REVISION OF THE EU ECOLABEL CRITERIA FOR PAPER PRODUCTS**

## **TABLE OF COMMENTS Post - 1<sup>st</sup> AHWG Meeting**

September, 2017



# EU Ecolabel and EU GPP criteria revision for paper products

## Consolidated feedback relating to publication of the Ecolabel Technical Report version 1.0 (May 2016) post the 1<sup>st</sup> AHWG meeting in June 2016

Table 1 contains the comments and associated report references copied directly from feedback provided by industry to the JRC-IPTS on BATIS and via other means. The comments have been ordered by the correct section and page references.

*Note: Some of comments specific to tissue paper will be addressed during separated webinar.*

**Table 1: Table of Comments relating to the draft Ecolabel Technical Report (version 1.0, May 2016)**

No.	Reference: - section/task -page	Subject of the comment	Comment	Response
<b>Comments relating to the introduction and scope</b>				
1	TR 1.1. Brief background to the EU Ecolabel, p.6	The overall ambition level for criteria should aim to target the 10% to 20% most environmentally friendly products currently on the market	The wording “the 10% to 20% most environmentally friendly products currently on the market”, is confusing. Do we speak about <b>market</b> (a market share, within the total marketplace; or a share of the “eco-products” range?), or instead about <b>production</b> environmental performance? The point we make is the following: the key leverage is not linked with criteria modification (plus or minus), but linked with the end-market conditions. In short, the Ecolabel is a market-driven system. For Tissue paper products: in the consumer market, the distribution main players are deciding which part they allocate to the “most environmentally friendly products”, not the industry. In the AFH market, general EE criteria are today mandatory. <b>To move the cursor on criteria values will have no influence on the market share percentage of Ecolabel products.</b> Moreover, to be able to ensure a significant share and the visibility of the EE Brand, the percentage of industrial sites in position to supply Ecolabel products should be <b>as high as possible</b> . For a synthetic explanation about the launching process of tissue paper products, please refer to <b>Annex 1 “Tissue Paper Products - French market”</b> .	Clarification: EU Ecolabel is intended to target the top 10-20% of paper products on the European market (represented by the scope of the revise criteria set). The holistic approach is therefore the most appropriate and feasible in setting the criteria levels for the parameters used in eco-labelling, i.e. to reach the lowest overall environmental impact in an integrated approach.

No.	Reference: - section/task -page	Subject of the comment	Comment	Response
2	TR 1.1. Brief background to the EU Ecolabel, p.6	The criteria development process involves scientists, non-governmental organisations (NGOs), Member State representatives and industry stakeholders.	[In relation with Comment 1.] Please note that the stakeholders list is not comprehensive. A main player is permanently (regrettably?) absent: <b>customers</b> , which are not end-users (consumers), but <b>distribution</b> companies.	Accepted. We agree with this and would welcome any suggestions of stakeholders in product distribution who you think would be interested in participating in the revision process.
3	Section 1.2. pg. 7	The overall aim of this project therefore is to assess the need for updating existing criteria	In order to be an attractive and efficient tool for both companies, competent bodies and authorities, ecolabel, the best option is to keep existing criteria and update and fine tune where it is needed. To delete "...and potentially developing new criteria where deemed appropriate".	Rejected. While we agree in principal that changes should be incremental rather than revolutionary in order to enable smooth progress, this should not justify the <i>de facto</i> exclusion of any potential new criteria if justified from technical perspective.
4	TR 2.2 Legal and policy context, p.9-10		It is obvious that stakeholders are quite often tempted by extensive/comprehensive control procedures over all parameters. It could be problematic in terms of feasibility and costs, for both industry and competent bodies. In addition, the verification process is not necessary when the production and the launch on the market of eco labelled (and not eco labelled) products is subject to European regulations. Therefore we recommend to avoid, as much as possible, the duplication/redundancy of verification procedures (for example, Hazardous substances, Timber regulation...). We also recommend to take in account, as much as possible, the existing systems for procedures and control validation, as ISO9001, ISO14001, ISO50001... or similar.	Partially accepted. Close alignment with ISO 14001, 9001, 50001 and EMAS frameworks is agreed. So too is the desire to avoid unnecessary repetition any legal wood criteria aligning with EUTR. However, with hazardous substances, we are required to have specific criteria in place for all EU Ecolabel product groups as a direct result of articles 6(6) and 6(7) of the EU Ecolabel Regulation.
5	Section 2.1 pg.9	Another way of splitting different paper products, which is generally used when reporting market data, is based on the raw material inputs and finishing processes that apply to the paper product, for example	no paper grades from recycled fibres included add recycling paper	Accepted with a comment: recycled fibre should be treated as feedstock of equal value to virgin fibre. CEPI statistic reports the quantity of recycled paper used in different paper products. Recycled paper grades are specified by EN 643. The direct link will be established for the document clarity.  <a href="http://www.cepi.org/system/files/public/documents/publications/statistics/2016/FINALKeyStatistics2015web.pdf">http://www.cepi.org/system/files/public/documents/publications/statistics/2016/FINALKeyStatistics2015web.pdf</a>

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
6	Section 2.1 pg.9	Another way of splitting different paper products, which is generally used when reporting market data, is based on the raw material inputs and finishing processes that apply to the paper product, for example:	When considering raw materials, in this list recycled paper is missing. To include recycled grades in the list or a note showing that also paper for recycling can be used as a raw material	Accepted
7	Section 2.3 pg. 10	The market analysis revealed that there is a positive growth in the tissue and packaging paper production, which offset the decline in global graphic paper production (WAN-IFRA, 2014).	<p>Source PPPC for total Europe inc. RUSSIA/CIS:</p> <p>Consumption decline in the last 5 years. Copy and Graphic Papers: -16% Newsprint: -24%</p> <p>Forecast Consumption next 5 years. Copy and Graphic Papers: -13% Newsprint: -22%</p> <p>Excluding Russia, the market would decline even faster. Major reasons for the declining market are also the governments and administrations reducing consumption. This information is to be taken into account for the whole revision process of the Ecolabel criteria. Paper producers will not be able to make significant investments in the copy and graphic and newsprint sector in Europe.</p> <p>To add the sentence “The European consumption of copy and graphic papers and newsprint papers have been declining and will continue to decline at a very fast rate.</p> <p>Consumption decline in the last 5 years. Copy and Graphic Papers: -16% Newsprint: -24%</p> <p>Forecast Consumption next 5 years. Copy and Graphic Papers: -13% Newsprint: -22%</p>	Accepted

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
8	Section 2.3 pg.11	With regards to the EU Ecolabel, the TP and CGP product groups are two of the most successful product groups in terms of licensed products on the market. As of September 2015, a total of 192 licences had been issued for CGP, NP and TP producers, covering a total of 9,546 individual products, as shown in below.	Paper industry has been active but printing industry hasn't. As a result only a very small share of ecolabelled graphic paper will be ecolabelled as a printed product. There are only a couple of handful of licensed printers and they for sure print the majority of their products without an Ecolabel logo.	Clarificaiton: The comment refers to EU Ecolabel for printed paper PG that constitutes another project. Still the relation to the mentioned product group will be crossed - check.
9	Section 2.4. pg. 11	Emissions to water during pulp and paper production (especially COD, AOX and P);	To delete “- Emissions to water during pulp and paper production (especially COD, AOX and P)”	Rejected: The proposal to withdraw the statement is not substantiated. The life cycle analysis revealed that emission to water is one of the key environmental impacts associated with the pulp and paper products
10	Section 2.4. pg.11	Forest destruction	The recent PEF study for Intermediate Paper Products and the related supporting studies (May 2016) showed that eutrophication is not a relevant impact category. For the paper sector, forest destruction is not an issue for wood originating from Europe, North America or Latin America where the paper industry exclusively uses wood from plantations. Furthermore, any wood placed on the European market needs to comply with European Timber Regulation assuring legal harvesting. The term “forest destruction” does not mirror the actual situation and it should not be used in this context. To replace “forest destruction” by “land use”	Clarification: The wording will be adapted
11	Section 2.4 pg.12	Identification of most relevant impact categories for a representative graphic paper intermediate product (source PEFCR screening study).	There is a permanent ambiguity in referring to a LCA approach for EE, as for PEF study, with different results, because of normalisation in case of PEF. The ambiguity is enhanced through the evaluation of production impacts instead of considering the end-product and usage of it (“sins of youth” of the Ecolabel approach, permanently repeated).For example, it has been clearly demonstrated that Eutrophication is no relevant impact category (see TR Figure 2, p.12 + PEF Intermediate Paper Products, BP X30-323-8 Méthodologie d'évaluation des impacts environnementaux du papier-toilette, BP X30-323-22 Méthodologie d'évaluation des impacts environnementaux des essuie-tout ménagers, e.g.).This might be misleading for end-users (consumers) of such products, because of contradictory information! We recommend to pay special attention to this point, to avoid misleading evaluation and useless penalties on such non relevant impact categories.	Clarification: The text included in TR addresses the main areas of possible environmental impact identified within the course of the project.

No.	Reference: - section/task -page	Subject of the comment	Comment	Response
12	Section 2.5 pg.15	2. Fuel and electricity consumption, CO2 emissions and climate change:	Using any kind of biomass (especially wood) is maybe not the best way for paper industry; material use of biomass should be preferred to thermic use biomass is not an issue for recycling paper. Recycled fibres mills do normally not have an easy access to biomass (such as pulp mills with the black liquor have) to substitute fossil fuels	Clarification: The comments will be taken into account under requirement for energy consumption and CO2 emission.
13	TR 3.1 Name, definition and scope, p.16		We recommend to pay special attention to terminology and translation to avoid confusion.1. Make a clear distinction between “tissue paper”, which is an intermediate product (“mother reel”) and “tissue [paper] product”, which is the product launched and eco-labelled (namely, toilet paper, kitchen towel, hand towel, ...).2. The translation from English to other European languages is not only a linguistic issue, but much more a “marketing” issue: different markets use different terminology.3. It could be also specific terminology for end-user market: consumer market and “away-from-home” market (AFH).	Accepted: New definition has been proposed in reference to ISO 12625-1.
14	Technical Report 1.0 for the revision of EU Ecolabel criteria for paper products, pages 16	Scope	For tissue paper, we recommend to make reference to ISO 12625-1.	Accepted
15	Section 3.0 pg. 16	Scope	We support the proposal made by several stakeholders in the 1st Ad-Hoc Working Group meeting to include packaging into the scope of the Copying and Graphic product group. Many companies that manufacture packaging contacted with us to apply the EU Ecolabel. They already checked the criteria and confirmed us that they could fulfil the environmental criteria. For us, it is very difficult to argue that they could not apply the EU Ecolabel only because packaging is not included into the scope. We think that it is a pity that this kind of product, very extended in the market, has not the chance to apply for the EU Ecolabel. A SME company producer of packaging checked deeply the criteria of the Decision Commission of 7th June 2011. Concerning emissions to water and air, they use a biomass boiler and concerning sustainable forest management and a closed recirculating water system. Concerning the origin of the fibres, the pulp has the certificate FSC 100% recycled. On the other hand, they had passed the tests according the XXXVI Recommendation of the German BfR about paper and cardboard in contact with foodstuffs, and they also already reviewed the Security Data Sheet of the additives. For all that, we think that it is very important that the Joint Research Centre studies the chance to include packaging into the product group Copying and Graphic Paper.	Rejected: We understand the current market situation that shows the constant growth in packaging production, and thus the potential space for EU Ecolabel for the packaging product group. Nevertheless packaging forms a separated product group subjected to very final product-specific material processing and technology used (e.g. corrugated boards). The difference between different paper products should be recognised. This is also reflected by industry and statistical classification of paper products, where packaging constitutes an individual group. It does not fulfil the definition neither copying and graphic paper nor tissue paper. Apart of very specific function, packaging is a also recognised as a converted paper product which is a distinctive PG. By excluding the reference to grammage we broaden the scope to board used for copying and graphic purposes. The possibility to form a new product group for packaging lies out of the premises of the current EU Ecolabel revisions process.

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
20	Selected Text 2, 2, 1 pg.. 18 Section 3.2.1 pg.18	In line with this thinking, we propose revising the list of excluded products to include 'paperboard intended for packaging conversion'.	It would be very confusing to include "paperboard intended for packaging conversion". It is not a "copy and graphic paper", so the definition of the product category would need to be revised. The packaging sector is vast and also includes corrugated boards. The production process of corrugated board is very different to the copy and graphic paper production process. Packaging is a converted product so it would be more applicable for inclusion in the EU Ecolabel for Converted Products rather than in the scope of Copying and Graphic Papers. We ask to not mention packaging in the scope of the EU Ecolabel for Copying and Graphic paper.	Accepted with comment: For the clarity of definition used packaging is proposed to be specifically excluded from the scope of the product group copying and graphic paper.
22	Technical Report 1.0 for the revision of EU Ecolabel criteria for paper products, page 16-18	exclusion of paperboard intended for packaging conversion	In case of expanding the scope for paperboard > 400g/m <sup>2</sup> the Ecolabel for packaging should then only be permitted for B2B communication matters but not on packaging of final products (e.g. amazon parcels, shoe boxes) considering that the EU Ecolabel informs about the product and not about the packaging.	Accepted
23	Technical Report 1.0 for the revision of EU Ecolabel criteria for paper products, pages16-18	exclusion of paperboard intended for packaging conversion	Paperboard intended for packaging conversion should not be excluded from the scope of the criteria for copying and graphic paper. Packages are excluded from the scope of printed products anyway and there is no other product group covering them. Thus they can't be labelled with EU Ecolabel at the moment. (We should definitely discuss the option to develop criteria for packages in the near future.)	Rejected: Following industry classification, packaging is not copying and graphic paper and constitutes individual product group category (different product function and technology used, - conversion process is product specific). The possibility to create a new product group that encompasses packaging is considered laying beyond the current project.
16	Section 3.1 pg.16	Scope	No, newsprint and copy and graphic paper have different criteria and therefore they should not be merged New text: Copying, graphic Comprise sheets or reels of not converted, unprinted blank paper. It will include paper made from pulp and used for writing, printing newspapers and other printed products. It shall not include: thermally sensitive paper-photographic and carbonless paper. Newsprint paper: Comprise sheets or reels of not converted paper. It will include paper made from pulp and used for printing newspapers and other printed products. It shall not include: · thermally sensitive paper; · photographic and carbonless paper.	Rejected: New merged scope of the product group "paper products" has been proposed in line with recommendation of the Fitness Check <sup>1</sup> .

<sup>1</sup> REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND THE COUNCIL on the review of implementation of Regulation (EC)No 122/2009 of the European Parliament and of the Council on 25 November 2009 on the voluntary participation by organisations in a Community eco-management and audit scheme (EMAS) and the Regulation (EC) No 66/2010 of the parliament and of the Council of 25 November 2009 on the EU Ecolabel. COM(2017) 355 final



No.	Reference: - section/task -page	Subject of the comment	Comment	Response
19	Selected Text 2,2,1.pg.17 Section 3.2.1 pg.17	Scope	No, newsprint and copy and graphic paper have different criteria and therefore they should not be merged	see above
21	Technical Report 1.0 for the revision of EU Ecolabel criteria for paper products, pages17-18	merging the product groups copying & graphic paper and newsprint paper	Finland is strongly against merging the product groups mainly because of economic reasons, but also because of reasons mentioned in the technical report.	see above
32	Technical Report 1.0 for the revision of EU Ecolabel criteria for paper products, pages17-18	merging the product groups copying & graphic paper and newsprint paper	Austria would accept the merging of this product groups on condition that the percentage of recycled fibres remains at least 70% for newsprint paper.	see above
31	3.2.1 Copying and graphic paper / Newsprint paper Pg. 18	Q: Should the scope and definition of newsprint paper be merged with that of copying and graphic paper as proposed?	The scope and definition of the three groups should not be merged as the process are so different and it would be difficult to find a common and accepted level without being very weak.	see above
43	Section 3.2.1 pg. 19	Copying, graphic and newsprint paper	Copying and graphic paper / Newsprint paper We are not in favor to merge these two product groups. "Comprise sheets or reels of not converted, unprinted blank paper. It will include paper made from pulp and used for writing, printing newspapers and other printed products. "We are in favor to remove the limiting grammage 400 g/m2. We would also prefer to have criteria for packaging paper but as discussed at the working group meeting "packaging paper" is not homogenous group of paper and for it are the functional properties important and they define the type of packaging paper. The criteria in C&G paper are adapted for C&G paper and if all packaging paper were included then new criteria for them would need to be developed. However, it is not always clear what is graphic paper and what is packaging paper. In printed paper products same board that is used in packaging in used for exercise books post cards and so on. It is only a question of how the board is marketed. The board producer does not always know what the end product will be and therefore the meaning excluding "paperboard intended for packaging conversion "would be very difficult to follow up. In the product group Converted Paper Products is required that the paper substrate for carrier bags should be EU Ecolabelled with C&G paper criteria. However, for many producers the paper used in carrier bags is packaging paper why it should be mentioned in the scope that paper used for carrier bags are in the scope.	In relation to the product group definition see above. Additionally, EU Ecolabel for printed paper and converted paper products do not fall under the current revision process as these are separated product groups.

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
17	Section 3.1 pg.16	-products as referred to in Directive 76/768/EEC.	<p>Tissue is a very broad group of products with a high level of innovation. To ensure that current and future tissue products fit in the scope it should focus only on production process for making tissue and the functional requirements of tissue. The definitions in standard EN ISO 12625-1 (2011) give a good basis for the tissue definition.</p> <p>The basis weight of tissue can today be much higher than 50gsm stated in the standard. Finishing and functionality of tissue products is still as described in this standard. Non-sanitary napkins is not a commercial definition. We ask to delete it.</p> <p>Furthermore, we ask to include air-laid tissue, tissue products also classified as cosmetics and wet wipes if based on tissue.</p> <p>New text proposed: Tissue is products and base papers made from lightweight, dry or wet creped and some “non-creped” papers and airlaid paper.</p> <p>Tissue products can be made of one or several plies, each ply being of one or several layers, prepared as sheet or rolls, folded or unfolded, embossed or un-embossed, with or without lamination, printed or not printed and possibly finished by post-treatment, e.g. lotion application.</p> <p>The properties of tissue paper give its resulting products the typical high capacity of tensile energy absorption together with a good textile-like flexibility, surface softness, comparatively low bulk density and high ability to absorb liquids.</p> <p>Disposable tissue products are commonly used for hygienic and industrial purposes. Typical tissue products are: toilet paper, paper towels, napkins, tablecloths, placemats, coasters, handkerchiefs, facial tissue (non-exhaustive list).</p> <p>This product group does not comprise any of the following: Non cellulose based wipes: wet nor dry Sanitary products including absorbent undergarments such as disposable diapers</p>	<p>Partially accepted:</p> <p>-The definition is proposed to be based on the ISO 12625-11.</p> <p>-The reference to non-sanitary napkins has been removed. General exclusion of "wet wipes and sanitary products, including absorbent undergarments such as disposable diapers" has been proposed</p> <p>-Air-laid paper products can contain different materials such as fluff, polymers, as well as man-made cellulose fibres such as viscose. If polymers or viscose can be used to make air-laid paper, then specific criteria need to be introduced for polymers or viscose, based on LCA considerations. It would be inconsistent to exclude coated tissue products or tissue products laminated with materials other than tissue paper from the scope, if air-laid papers are included. Consequently, air-laid paper is not proposed to be included in the scope.</p>
44	Section 3.2.1 pg.19	Tissue paper products	<p>Take away following because it is not needed. Fragranced tissue paper products should not be encouraged. Napkins are included in the scope already: “It will include coloured, printed and/or fragranced tissue paper products. It will include tablecloths, mats and non-sanitary napkins, and other such products. “At the working group meeting was expressed that air-laid material should be included to the scope. However, if it is considered to do that you should bear in mind that air-laid material is not only one homogenous group of material but can be done with several different process techniques and contain different materials as fluff, polymers and different man-made cellulose fibres as viscose. Therefore, you will need to make a new LCA analysis adapted on air-laid materials because the processes are so different from the water based paper making processes. It may show up that the hot spots are different from papers. Then you would need to develop a different set of criteria adapted for air-laid material and processes. If airlaid material were included in the scopes then there would not be any meaning to exclude coated tissue products or tissue products laminated with other materials than tissue paper. These are excluded because they can't be composted or used for biogas production. Nor can the production waste be recycled at the mills. All waste must be incinerated. If other materials (as polymers or viscose) are allowed in the paper, then there must be criteria on them as well.</p>	<p>Accepted: As to the inclusion of air-laid material, following ISO 12625-1: Nonwovens are not classified as tissue, even if one subgroup of the nonwovens is manufactured in a wet-laid manner according to a process similar to the tissue making process. Air-laid process is not water based paper-making process. It is separated technology. We agree that from LCA perspective the hotspots of air-laid paper production are suspected to differ from the water based techniques.</p>

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
50	Section 3.2.2 pg. 20	Q: Should the scope of tissue paper be expanded to include non-coated mats, tablecloths, non-sanitary napkins and other such products?	Yes since all these products are made from tissue base paper. We ask to include tissue based mats and tablecloths, airlaid, tissue based wet wipes and other tissue based products.	Rejected: Air-laid process is a fundamentally different technology forming a product of different characteristic than water-base paper product. Non-wovan are excluded from the scope of ISO 12625-1:
18	Section 3.2.1 pg. 17	The report suggested that by extending the scope and definition of copying and graphic paper to include newsprint, the applicant could also be provided with the opportunity to put the Ecolabel label on the product with a phrase such as 'Printed on Ecolabel paper', which could help raise awareness amongst consumers.	As there is an EU Ecolabel for Printed Papers, the sentence "printed on Ecolabel Paper" is no longer relevant. We propose to no longer accept the possibility to use a phrase such as "Printed on Ecolabel paper" without the printed products being certified with the Ecolabel for Printed paper.	Rejected: Printed product is a separated EU Ecolabel product group.
24	Section 3.2.1 pg.18	Q1: Should the scope and definition of newsprint paper be merged with that of copying and graphic paper as proposed?	No position for the moment.	

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
25	Section 3.2.1 pg.18	Q.: Should reference to the paper grammage be removed and substituted by product functionality?	We are in favour of the use of product functionality.	Accepted
26	Section 3.2.1 pg.18	Another option is that the upper limit could potentially be revised to be 224g/m <sup>2</sup> , to reflect the fact that anything above 224g/m <sup>2</sup> is in fact paperboard used for packaging purposes and therefore a different end-product to copying, graphic or newsprint paper.	There are copy and graphic papers above 224g/m <sup>2</sup> or even above 400g/m <sup>2</sup> . To avoid any confusion, it is best to define the certified product according to its functionality (at least for copy and graphic papers). It would also be in line with the definitions used in the PEFCR. To remove the upper limit for grammage.	Accepted
27	Section 3.2.1	Q: Should the weight based upper limit of 400g/m <sup>2</sup> be revised to be 224g/m <sup>2</sup> in the newly proposed scope of copying and graphic paper merged with newsprint paper?	No, grammage limits should be removed as there is no technical justification to these limits. The weight limit should be removed as there are copy and graphic papers above 400g/m <sup>2</sup> .	Accepted
28	Section 3.2.1 pg. 18	Q: Should 'not converted board' also be removed from the scope for copying and graphic paper merged with newsprint paper?	We ask to delete grammage, therefore this sentence is no longer needed as term "board" is no longer relevant	Accepted

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
29	Section 3.2.1 pg. 18	Q.: Should reference to the paper grammage be removed and substituted by product functionality?	Yes, grammage limits should be removed as there is no technical justification to these limits	Accepted
30	Section 3.2.1 pg.18		Yes	
33	page 18	weight-based restriction 400 g/m2	The Scope should be expanded to paperboard above 400g/m <sup>2</sup> .Rational: Paperboard > 400g/m <sup>2</sup> is needed for Ecolabel „converted paper products (CVP)“. Producers of CVPs could then use EU Ecolabel paperboards what would finally lead to a bigger incentive for producers of paperboards to become licence holders, because they would be able to apply for a bigger range of products.	Accepted with comment: the scope has been extended according to the product group functionality
34	Section 3.2.1 pg. 18	Q1: Should the scope and definition of newsprint paper be merged with that of copying and graphic paper as proposed?	In principle, we are not against of merging of the copy paper and newsprint. However, we are concerned whether we will be able to establish objective criteria for such a complex and diverse group of products. It should be noted that there are differences in the production processes of the copy paper and newsprint, so the variations in energy consumption in the production of pulp and paper production exist. In addition, various additives are used (chemicals).	Accepted
35	Section 3.2.1 pg. 18	Should the weight based upper limit of 400g/m2 be revised to be 224g/m2 in the newly proposed scope of copying and graphic paper merged with newsprint paper?	We are in favor of the division according to the intended use because by adopting the division according to the production process, there is a risk that it does not take into account all processes (and we exclude certain products). Whereas the definition based on the use of the product will reduce the occurrence of such risks. according to their intended use: · Informative use (e.g. CGP and NP)·Packaging Hygienic (e.g. TP)·Speciality	Accepted
36	Section 3.2.1 pg.18	Should 'not converted board' also be removed from the scope for copying and graphic paper merged with newsprint paper?	We are for the removal 'not converted board', to ensure consistency	Clarification: Converted paper products constitutes separated EU Ecolabel product group according to the Commission Decision 2014/256/EU

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
37	Section 3.2.1 pg. 18	Should reference to the paper grammage be removed and substituted by product functionality?	We opt for deleting the (artificial) limit of paper grammage weight of the paper. We propose to remove this provision from the definition.	Accepted
38	Section 3.2.1 pg. 18	Should reference to the paper grammage be removed and substituted by product functionality?	We opt for deleting the (artificial) limit of paper grammage weight of the paper. We propose to remove this provision from the definition.	Accepted
39	Section 3.2.1 pg. 18	Q: Should 'be included in the list of excluded products from the scope of copying and graphic paper merged with newsprint paper?	Yes, it should. We are concerned that the introduction of the criteria 'paperboard packaging for the intended conversion' without extensive discussion and good preparation of objective criteria, may result in discrimination against manufacturers from continental Europe.	Accepted
40	Section 3.2.2 pg. 18	Q: Should 'paperboard intended for packaging conversion' be included in the list of excluded products from the scope of copying and graphic paper merged with newsprint paper?	It seems that the process production is not the same between paperboard intended for packaging conversion and graphic paper. That's why it may be relevant to include them in the list of excluded products.	Accepted
41	Section 3.2.1 pg. 18	weight-based restriction 400 g/m2	Reference to the paper grammage should be removed. It can be substituted by product functionality, but we should keep in mind that we have also a product group "converted paper products". It would ease the work of paper producers and CBs if also grammages above 400 g/m2 could be included in the licenses. Now if a converted paper product producer uses "not licensed grammages" of EU Ecolabelled paper, he must submit a lot of data to the CB. It would also ease the marketing of these heavier papers to the converted paper product producers if they were included in the licenses.	Accepted

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
42	Section 3.2.1 pg. 19	Q: Is the new proposed name for the merged copying, graphic and newsprint paper product group of 'Paper suitable for printing or other graphic purposes' suitable and appropriate?	Yes	Accepted
45	Section 3.2.1 pg. 19	Is the new proposed name for the merged copying, graphic and newsprint paper product group of 'Paper suitable for printing or other graphic purposes' suitable and appropriate	We reckon that proposed name is suitable.	Accepted
46	3.2.2 Tissue paper pg.19	Q: Should the scope of tissue paper continue to include printed, coloured and/or fragranced tissue paper products?	The EEB and BEUC have a strong opinion that fragranced tissue paper should not be included in the scope, considering that fragrances do not have a function on these products and raises concerns in terms of health and environmental impacts.	To be answered in a later stage
47	Section 3.2.2 pg. 20	Q: Should the scope of tissue paper be expanded to include non-coated mats, tablecloths, non-sanitary napkins and other such products?	An alignment with ISO 12625 should be sufficient.	Accepted

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
48	Section 3.2.2 pg. 20	Q: Should the scope of tissue paper continue to include printed, coloured and/or fragranced tissue paper products?	We support a ban of fragrances because first they are not useful for the main purpose of the product.	To be answered in a later stage
49	Section 3.2.2 pg. 20	Q: If the scope for tissue paper will continue to include printed tissue paper products, should additional wording be proposed on the printing inks (as is currently the case in the Commission Decision 2012/481/EU on the EU Ecolabel criteria for printed paper under Criterion 2 on Excluded or limited substances and mixtures, part (f) on Printing inks, toners, inks, varnishes, foils and laminates (European Commission, 2012b))?	A requirement on ink should be introduced as it is done for printed paper. The requirement should also be assessed regarding the technical improvement, the regulation since 2012 (date of the Decision 2012/481/CE).	To be answered in a later stage
51	Section 3.2.2 pg. 20	Q: Should the scope of tissue paper continue to include printed, coloured and/or fragranced tissue paper products?	yes, printed products and fragranced products should be included. Printing inks will meet other EU Chemical regulations. Fragrances are usually added to increase the functionality to the tissue products. Furthermore we ask to delete the exclusion to tissue products if covered by products as referred to in Directive 76/768/EEC.	To be answered in a later stage



N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
52	Section 3.2.2 pg. 20	Q: If the scope for tissue paper will continue to include printed tissue paper products, should additional wording be proposed on the printing inks (as is currently the case in the Commission Decision 2012/481/EU on the EU Ecolabel criteria for printed paper under Criterion 2 on Excluded or limited substances and mixtures, part (f) on Printing inks, toners, inks, varnishes, foils and laminates (European Commission, 2012b))?	No, there is no need for specific criteria for inks. Printing inks and dyes are chemicals and therefore they are already covered by general criterion on classified substances and SVHC.	To be answered in a later stage

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
53	Section 3.2.2 pg. 20	Q: If the scope for tissue paper will continue to include printed tissue paper products, should additional wording be proposed on the printing inks (as is currently the case in the Commission Decision 2012/481/EU on the EU Ecolabel criteria for printed paper under Criterion 2 on Excluded or limited substances and mixtures, part (f) on Printing inks, toners, inks, varnishes, foils and laminates (European Commission, 2012b))?	If printed and coloured paper are part of the scope, specific requirements for the inks will be needed.	To be answered in a later stage
54	Section 3.2.2 pg. 20	Q: Should the scope of tissue paper be expanded to include non-coated mats, tablecloths, non-sanitary napkins and other such products?	We are in favor of extending the scope and adaptation to the definition of ISO 12625	Accepted
55	Section 3.2.2 pg. 20	Should the scope of tissue paper continue to include printed, coloured and/or fragranced tissue paper products?	We opt for including printed, coloured and/or fragranced tissue paper products.	To be answered in a later stage

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
56	Section 3.2.2 pg. 20	If the scope for tissue paper will continue to include printed tissue paper products, should additional wording be proposed on the printing inks (as is currently the case in the Commission Decision 2012/481/EU on the EU Ecolabel criteria for printed paper under Criterion 2 on Excluded or limited substances and mixtures, part (f) on Printing inks, toners, inks, varnishes, foils and laminates (European Commission, 2012b))?	Yes, but keep in mind that soon the criteria for printed paper will be revised. At the moment, the criteria do not have the measuring threshold for "consumables" (hazardous substances) to be assessed, where in other products, it is fixed at the level of <0.010%. It is however accepted certain concentration limits for hazardous substances in the CLP Regulation (different values: 0.010% - 10%).	To be answered in a later stage
57	Section 3.2.2 pg. 20	Should the scope of tissue paper be clarified to clearly exclude tissue paper products such as disposable diapers that are absorbent undergarments making reference to the Commission Decision 2014/763/EU?	yes	Accepted

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
58	Section 3.2.2 pg. 21	Q: Should the scope of tissue paper be clarified to clearly exclude tissue paper products such as disposable diapers that are absorbent undergarments making reference to the Commission Decision 2014/763/EU?	An alignment with ISO 12625 should be sufficient.	Accepted
59	Tissue paper [scope] p.19-21		The possible modification of the scope for Tissue paper products “to include many more products” [Conclusion, p. 122] could be confusing. Historically, the TP reference document has been based on a tissue paper production process. All criteria are linked with specific emissions and consumptions of pulp and tissue paper industry. If the modification is intended to include products according to their functionalities (table cloth, hand towelling, hygiene care...), this could lead to a complete different approach, taking thus in account other production processes (textile, nonwoven, plastics, e.g.). To maintain the consistency of the “paper” approach, it seems necessary to keep the “pulp and paper” scope. In this context, referring to ISO 12625-1 definition would avoid any useless inclusion or restriction. For example, “non-sanitary napkins” (what is it?), “wet wipes” ... sound strange and confusing.	Accepted with comment: For the clarity, the proposed product group scope and definition is intended to be aligned with ISO 12625-1. In this sense non-woman will be specifically excluded.
60	Section 3.2.2 pg. 19-21	scope for tissue paper criteria	Austria supports expanding the scope of tissue paper to include non-coated mats, tablecloths, non-sanitary napkins and other such products. Fragranced tissue should be excluded.	As supported by the majority of stakeholders the scope will be harmonised with ISO 12625-1. Napkins, tablecloths, and mats will be covered by the criteria as long as they fulfil the product group definition
61	Section 3.2.2 pg. 19-21	scope for tissue paper criteria	Finland supports expanding the scope for tissue paper to include non-coated non-sanitary napkins, tablecloths and mats.	As supported by the majority of stakeholders the scope will be harmonised with ISO 12625-1. Napkins, tablecloths, and mats will be covered by the criteria as long as they fulfil requirements of the standard.
62	Section 3.3 pg. 21	Q. If this goes ahead, what are the key roles and responsibilities for maintaining any central database of approved pulp suppliers? Lessons learned from Nordic experience?	This point should be discussed with both CB and the industry to assess the feasibility and relevance: would audit be possible? Could the provider of pulp give the technical specification to the industry? What would be the impact on the cost of this intermediate product?	Accepted

No.	Reference: - section/task -page	Subject of the comment	Comment	Response
63	Section 3.3 pg. 22	Q. Which is degree of interest from market pulp suppliers about this?	Pulp is an intermediate product and although its environmental data must be verified, the verification process should not be disqualifying. A paper manufacturer should be able to use a mix of pulps and some of them might have higher emission levels than the Ecolabel limits. Otherwise, there is a risk of limiting pulp supplies for integrated mills. Do not consider a label or a certificate or a verification for market pulp, but rather: Provide a template so that pulp supplier can communicate their data in a standardised format. Allow the use of data measured using National standards approved by local authorities Set up a shared information tools between competent bodies for the approval of Criteria 4 (chemicals)	Partially accepted: The pulp used to manufacture EU Ecolabel product should fulfil process requirements established by the revised criteria. A standardised template to communicate data should rather be addressed by user manual and not the legal text of the Commission Decision (criteria document). The monitoring system and testing method used are proposed to follow the rules established by IED. In this sense BAT 9 of BAT conclusions states (2014/687/EU): is to carry out the monitoring and measurement (...) according to EN standards. If EN standards are not available, BAT is to use ISO, national or other international standards which ensure the provision of data of an equivalent scientific quality. The co-operation between Competent Bodies is out of the scope of the criteria revision.
64	Section 3.3 pages 21-22	Certification or approval of pulp	We do not recommend a certification of pulps. It is the final product (whether it uses one or several pulps) that is certified and that must meet the criteria. However, it seems essential to release the user guide and the calculation template at the same time as the criteria revision, to facilitate communication.	See above
65	Section 3.3 pages 21-22	approval of pulps	We support to build up an “approved pulp” database so that applicants can check if the pulps they want to use are listed. Of course this would also ease the work of CBs as the chemical evidence for each pulp of every applicant wouldn’t be mandatory any longer. Furthermore it would be possible to generate the emission points by using the available values in the database. Moreover pulp producers should be obliged not to communicate approved pulps otherwise there will be the opportunity to use low graded pulps only in combination with good pulps causing lower emissions.	It is proposed to further discuss the approval of market pulps. The basic proposal is to include the methodology in the user manual, if applicable
66	Section 3.3 pg. 22	Which is degree of interest from market pulp suppliers about this	We have observed an increasing interest from the side of market pulp suppliers in certification of pulp.	See above
67	Section 3.3 pg. 22	What is the opinion of Competent Bodies about separate pulp mill audits? Would it follow existing fee structures for licenced products?	We consider that certification process of pulp should include both evaluation of pulp suppliers’ documentation and audit at site.	See above

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
68	Section 3.3 pg. 22	If this goes ahead, what are the key roles and responsibilities for maintaining any central database of approved pulp suppliers? Lessons learned from Nordic experience?	We suggest to create a central database where all pulp suppliers approved by particular competent bodies will be registered as it is in case of ECAT.	The organisation of the list and communication depends on the DG ENV. It lies out of the scope of the criteria revision.
69	Section 3.3 pg. 22	Q. If this goes ahead, what are the key roles and responsibilities for maintaining any central database of approved pulp suppliers? Lessons learned from Nordic experience?	It is extremely important for the competent bodies to get access to lists of pulps and chemicals that are already approved by another competent body. In the Nordic Ecolabel we have the web based application tool where we assess pulps, chemicals and papers. The names of the approved pulps and chemicals are seen by the paper producers and the inspected graphic papers are seen by the printing houses. This far all the lists have not been public, only a voluntary list have been on the home page of Nordic Ecolabel have been published for those pulp producers that have applied for it and pay an annual fee for that. This application tool is extremely helpful for the 5 Nordic countries assessing applications. It must be kept in mind that there are no absolute criteria on pulps so in list of approved pulps it must be explained clearly that it is the paper producer who makes the calculation that shows if the paper passes the criteria. The pulp mills can be audited as well as the paper mills. There should be separate fee for that	The co-operation between Competent Bodies is out of the scope of the criteria revision.
70	Section 3.3 pg. 21-22	approval of pulps	We should make it possible for pulp producers to apply for an approval. Approved pulps should be listed in a database, which could be public like LuSC-list. This would make both license holders' and CBs' life much easier. Finland is ready to discuss upkeep of such list. Approval and listing of pulps should be submitted to a charge. CBs should cooperate in the field of pulp mill audits to avoid excess travelling. (For example one CB could check all the pulp mills in South America.)	Partially accepted. The way in which pulp approval might be realise needs to be subjected to the further discussion.  The co-operation between Competent Bodies is out of the scope of the criteria revision.
71	Technical Report 1.0 for the revision of EU Ecolabel criteria for paper products, pages 21-22 Section 3.3 pg. 22	approval of pulps	The need for separate approval of pulps is well justified in the Technical Report, but discussion on what means "Competent Bodies should have access to all relevant documentation" in the first chapter on the page 22 is needed.	Clarification: Criteria revision encompass technical analysis of the possible update of requirements. The logistic of co-operation established between different CBs does not form a part of the project, being rather a subject to the separated agreement established ate the CB Forum level. EU Ecolabel Regulation does not foresee that the criteria regulate the co-operation between different Competent Bodies.
<b>Comments relating to Criterion 1: Emissions to water and air</b>				

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
72	Criterion 1: Emissions to water and air Pg.23	Q. How to set the most appropriate ambition level EU Ecolabel benchmarks in the context of the ranges reported for BAT-AELs in the 2014 BREF document. Specific data from existing license holders is requested to use as a starting point for discussions	It is crucial to ensure an ambition level that corresponds to a label of environmental excellence. As highlighted in the Technical Report: “The EU Ecolabel promotes the production and consumption of products with a reduced environmental impact along the life cycle and is awarded only to the best (environmental) performing products in the market.” The EEB and BEUC consider that the benchmark studies from BAT-AEL in the BREF document and the EkONO benchmark study (delivered to JRC) should be used as a base. The limits set for emissions in the EU Ecolabel should be in the stricter range of the BAT-AEL values. NGOs have strong concerns as regards some of the proposals where the permissible levels of emissions are aligned with what is already obligatory (this is the case for water emissions at least) and the maximum allowed under outdated data for the Pulp and Paper BREF (BAT conclusions from 2014). Manufacturers have up to 30/09/2018 to comply with all the requirements. The lower range (the stricter) is “true BAT”, the upper range corresponds to a political compromise or what 80% of the existing industries already meet.	Partially accepted: Ecolabel multi-criteria evaluation system needs a holistic approach. The lower BAT ranges reported by industry mill might be representative for one parameters, but does not mean that the same mill is able to reach the lowest AELs values for another requirement. According to the feedback received from industry lowering one parameter might result in raising of another one The revision should ensure that the values established represents 10-20% of the market of a final paper product (not pulp manufacturing). This is why the revised values should be set at the level that ensures market penetration.
73	Technical Report 1.0 for the revision of EU Ecolabel criteria for paper products, page 23	Criterion 1a) emissions to water and air	Reference values should be derived from BREF Document „pulp & paper 2014“, this BREF document is based on a broad database and reflects BAT. It is important to bear in mind, that the discussed values are reference values to calculate “emission points”, so they are not too demanding, because limit values would be 50% higher.	Accepted
74	Criterion 1: Emissions to water and air	Criterion 1: Emissions to water and air	In general PL is of the opinion that the levels of reduction of particular pollutants must be realistic and feasible from the standpoint of national industries. Therefore PL supports reasonable concerns of paper industry over too ambitious levels of reduction of SO2 and NOx for that industry. By way of example PL attracts attention of all stakeholders of the Revision process to recently concluded negotiations of NEC directive related, inter alia, to aggregated levels of reduction of SO2 and NOx. Keeping in mind that negotiations were concluded not without controversy, which justifies a cautious approach to any proposals in respect of the aforementioned pollutants.	Accepted  Additional clarification: the revised proposal contains changes in the emission reference values from one side, and the reduction of maximum allowed score for individual emissions (from 1.5 to 1.25), from the other.

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
75	Section 4.1 Criterion 1 pg. 23	Table4:Overview of current reference emissions levels	In general, it has to be taken into account, that natural gas as fuel is not available in all mills and industry is looking for sustainable alternatives in energy sources (e.g. biomass, surrogated fuels with biogenic content). Biomass and biomass containing fuels are including sulphur in variable amounts. For example: Using biomass (straw, grass, corn) as fuel can lead to sulphur emissions (100 – 150 mg SO <sub>x</sub> /m <sup>3</sup> ). Besides this, following the laws of circular economy residues and sludge from recycled paper manufacturing should be recycled or, if recycling is not possible, reused for thermal treatment. Using residues for thermal treatment generates two benefits: The biogenic content (fibres) helps to replace fossil fuels (CO <sub>2</sub> emissions) and improves waste management (no disposal, see chapter 4.5) making the whole process more sustainable. Sulphur emissions may occur as well from recovery boiler (ENV/130/13) and thermal sludge treatment from paper processing (Co-combustion of pulp and paper sludge with wood – Emissions of nitrogen, sulphur and chlorine compounds; Department of Energy Conversion, Chalmers University of Technology, SE-412 96 Göteborg, Sweden). Also sludge from anaerobic effluent treatment may contain sulphur and therefore may lead to sulphur emissions as well. To revise sulphur limits taking into account the use of biomass	Accepted
76	Section 4.1 pg. 23	Dust particles	Why are dust particles not taken into account?	From the LCA perspective, it is considered that parameters that describe emission into air (NO <sub>x</sub> and sulphur) are sufficient.
77	Selected Text 3,1 pg.1 4.1 pg.23	Criterion 1: Emissions to water and air	<p>1. We support the approach where the BAT ranges are used as starting point and that the values from the current license holders are used to establish the reference values. The idea behind the emission points system is that the reference value shall correspond to an environmentally well performing production. So a paper that scores one for each parameter is performing environmentally well.</p> <p>2. Never the less, pulp and paper mills have different conditions to achieve low emissions of the different parameters depending on the production process access to fuels, wood raw material etc. Therefore, the emission point's equation offers the paper producer flexibility. It is possible to have up to 50% higher emission of the parameters as far the sum of total does not exceed 4. However, a higher emission in one parameter means that some of the emission parameters must be even better than one. At the same time a paper producer not performing very well can improve the overall environmental performance of the paper by using good pulps. Therefore, that is feasible to use the values from the license holders to set the reference values.</p> <p>3. The average emission values of all license holders should be the value for the best environmental performance on the market. The values from the producers outside Ecolabelling are thus not needed.</p> <p>4. We support keeping the equation as it is and that the reference values are updated.</p>	<p>1. Accepted</p> <p>2. Accepted with comment: the maximum permitted score is proposed to be lower from 1,5 to 1.25.</p> <p>3. Partially accepted: The limited license holder's data provided has not been sufficient to establish the threshold levels. This is why the data from the producers that are not EU Ecolabel license holders has been cross checked.</p> <p>4. Accepted</p>
78	Section 4.1 pg. 23		Reference values of emissions to air and water have an upper and a lower limit. Range levels are not suitable when calculating if the demands are fulfilled. Proposed criterion lower range levels are extremely low compared to the existing criterion. Only upper range levels should be used.	Partially accepted: Upper levels set up in the TR1 in majority reflect upper levels of BAT that will become obligatory for the pulp and paper industry. The main approach of the EU Ecolabel is to establish the values that represent reduced environmental impact. The revised proposal included in TR2 considers information found in BREF and supported by the data sent by the license holders



No.	Reference: - section/task -page	Subject of the comment	Comment	Response
79	Section 4.1 pg.24	Allocation for situations where co-products other than pulp or paper are produced - e.g. a CHP unit supplying part of produced electricity to the public grid.	<p>1. We think that is regulated already by the current criteria and the allocation equation. If needed we can explain with a specific example.</p> <p>2. A situation that is not very clear in the current criteria is, when the paper/pulp producer is purchasing steam from an external heat plant. In that case the emission raised by the external steam production must be included the paper/pulp productions emissions. That means that the paper/pulp producer must ask for the S, NOx and CO2 emission values for the steam and calculate from the amount of purchased steam its share of the emissions, and add it to the emissions from the paper/pulp production at the site</p>	<p>1. Accepted,</p> <p>2. Accepted with comment: We agree with the lack of clarity. The current criterion will be analysed. The possibility to extend the emission requirements to the external steam supplier needs to be discussed at the AHWG level.</p>
80	TR 4.1 Criterion 1: Emissions to water and air, p. 24	In many cases paper only contains one type of pulp together with fillers and coating. However, there are also cases where different types of pulps are mixed. The calculation should be then weighted according to the content of each pulp in the final product.	Tissue paper is always made by mixing different pulps. The compliance of the mix is therefore an issue (see Comment 10).	Accepted: The calculation is proposed to be weighted according to the % content of each pulp in the final product.
81	Technical Report 1.0 for the revision of EU Ecolabel criteria for paper products, pages 24-25	monitoring of emission parameters	There should be a “comprehensive” list of corresponding test methods. In different countries authorities often demand use of other test methods than those mentioned in the criteria document.	Partially accepted: The monitoring system and testing method used are proposed to follow the rules established by IED. In this sense BAT 9 of BAT conclusions states (2014/687/EU): is to carry out the monitoring and measurement (...) according to EN standards. If EN standards are not available, BAT is to use ISO, national or other international standards which ensure the provision of data of an equivalent scientific quality.

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
82	Section 4.1 pg. 24	How to set the most appropriate ambition level EU Ecolabel benchmarks in the context of the ranges reported for BAT-AELs in the 2014 BREF document. Specific data from existing licence holders is requested to use as a starting point for discussions.	<p>Please find below data on our licence holders (attached) In general, we are of the opinion that the levels of reduction of particular pollutants must be realistic and feasible from the standpoint of national industries. Therefore we support reasonable concerns of paper industry over too ambitious levels of reduction of SO<sub>2</sub> and NO<sub>x</sub> for that industry</p> <p><i>Note: Supporting documentation (e.g. table, figures) submitted along with the comment made can be found in the 'Supporting Documentation' section at the end of this document.</i></p>	Accepted with comment: we agree that the revised value should be realistic and achievable.
83	Section 4.1 Criterion 1 pg.24 table 5	Eucalyptus pulp will produce in general lower emission load than other pulp.	<p>1. Any wood specie has pros and cons when it is used in pulp making. This is also reported in the BREF: BREF page 254 "This can be explained by the fact that eucalyptus is easier to bleach and has a higher yield than wood species from central or northern Europe. Eucalyptus globulus have higher yields of around 51 – 54 % compared to Nordic softwood (44 – 46 %) and hardwood (47 – 49 %). Higher yields lead to lower specific emission load values (e.g. kg COD/ADt of pulp) even if the techniques applied are the same."BREF page 253 "In Europe, wood for kraft pulping can be distinguished into softwood, hardwood and as a speciality of the latter, eucalyptus. To a certain extent, the type of wood used for pulping may influence the yield, the applied processes and techniques, the process efficiency and the emission levels associated with BAT."BREF page 255 "Even if the specified level of technology is the same, eucalyptus mills produce emission loads that are mostly lower than those released from Nordic softwood mills. This should be borne in mind when comparing BAT-AELs expressed as specific loads (kg pollutant/ADt).</p> <p>2. "To make sure that all and any wood species are considered when setting the reference values. Stringent reference values will be discriminating against typical EU wood species (softwood and hardwood with high tannin content)</p>	<p>1. Accepted</p> <p>2. Partially accepted: Unless, specifically mentioned under BAT conclusions the intention is to establish one value that is both achievable and representative for all wood types. Following the feedback received, specific emission values have been proposed for eucalyptus and chest wood pulp.</p>
84	Section 4.1 Criterion 1 pg.24	Q. How to set the most appropriate ambition level EU Ecolabel benchmarks in the context of the ranges reported for BAT-AELs in the 2014 BREF document.	<p>1. BAT-AELs do not represent the conditions at each mill. A mill performing with the lowest values in the BAT range for all parameters does not exist in reality.</p> <p>2. Furthermore, the parameters are linked and in many cases when one is abated, another tent to raise and an integrated approach is needed. The most appropriate and feasible approach is to be holistic in setting the criteria levels for the parameters used in eco-labelling, i.e. to reach the lowest overall environmental impact in an integrated approach.</p> <p>3. This would imply that the highest value in the BAT-AEL ranges is already hard to reach.</p>	<p>1. Accepted</p> <p>2. Accepted</p> <p>3. Rejected: The emission reference values will derive from BREF that represents European pulp and paper state of the art. It should nevertheless be considered that the emission levels established by BAT conclusions will be obligatory for the European pulp and paper industry. This is why EU Ecolabel needs to be more demanding, still remaining at the level possible to be achieved by the current license holder and representing a holistic approach. Revised proposal is presented in TR2</p>

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
85	Section 4.1 Criterion 1 pg.24	In many cases paper only contains one type of pulp together with fillers and coating. However, there are also cases where different types of pulps are mixed. The calculation should be then weighted according to the content of each pulp in the final product.	In the case of tissue production and in non-integrated mills, different pulps are always used to achieve the desired specifications In few cases graphic and NP paper only contains one type of pulp together with fillers and coating. However, there are also cases where different types of pulps are mixed. In case of tissue production, and in general in non-integrated mills, different pulps are always used to achieve the desired tissue specifications in terms of absorption, strength, softness. The calculation should be then weighted according to the content of each pulp in the final product.	Accepted
86	Section 4.1 Criterion 1 pg.24	Boundaries to be set for water emissions - e.g. when effluent is sent to a wastewater treatment plant (WWTP) which also receives wastewater from other sources, how are emissions to water of the pulp and/or paper mills assessed?	According to the rules of the current criteria, shall, in a case, where waste water from paper/pulp production is sent to, for example, municipal waste water treatment plant, the emissions be measured before the waste water treatment. The waste water treatment plant shall be asked for the plants efficiency of the reduction of COD and P and the measured emissions before the treatment shall be reduced according to the information. The reduced emission values shall be reported to the CB. In this way the emissions of the paper/pulp production are not diluted and all paper/pulp producers are treated equally no matter who makes the treatment.	The alternative verification proposal has been developed
87	Section 4.1 Criterion 1 pg.24	Stakeholder feedback revealed that there are many different test methods used to monitor emissions	This criterion is of course not a problem for any European producer -- even though finding out about the relationships between the national standards and the ISO standards can be very difficult. For example Belgium has completely different national measurement methods. In an attachment an accreditation certificate issued by BELAC to a Belgian laboratory. Please take note to see how the national standards are expressed in a completely different way than the standard ISO ones. For the competent body it might also not be easy to assess these documents in languages that they are not fluent in.  From purely intellectual-logical perspective, a measurement method should not matter as long as a proper calibration curve can be demonstrated (ideally by a third party laboratory). Allowing ISO 14181 is a big step since this is the state of the art in measurement technology and the criterion now finally recognizes it.	Accepted with a comment: We recognise the state of the art and yet existent monitoring system. The continuous measurement of certain parameters will be added to A&V and so the reference to ISO 14181

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
88	Section 4.1 Criterion 1 pg.25 table 5	EN 21258:2010	The standard EN 21258 is related to N2O and not to NOx.	Accepted with comment: EN 21258 is a periodic monitoring method of N2O in stack gas that is based on non-dispersive infrared spectrometry. Standard Reference method (SRM) according to JRC Reference Report on Monitoring of emissions from IED-installations (Final draft) : <a href="http://eippcb.jrc.ec.europa.eu/reference/BREF/ROM_FD_102013_online.pdf">http://eippcb.jrc.ec.europa.eu/reference/BREF/ROM_FD_102013_online.pdf</a>
89	Section 4.1 Criterion 1 pg.25 table 5	EN 14792:2005	In the opinion of our expert the standard EN 14 792 covers the chemiluminescence only and not the other monitoring methods.	Partially accepted: We agree with an expert, EN 14792 determines mass concentration of nitrogen oxides in a stack gas. Monitoring method is chemiluminescence. It is specific test method for SRM. It is not clear why it should cover other monitoring methods. The main approach taken is that proposed A&V test methods are in line with Reference Report on Monitoring of emissions from IED-installations.
90	Section 4.1 Criterion 1 pg.25 table 5	EN 14791:2005	In the opinion of our expert the standard related to AMS are the following: EN 15267-1 to 3 and EN14181 (and not EN14791 or EN 14792).SRM is linked to EN 21258, EN 14791 et EN14792.	Rejected: EN 14792 determines mass concentration of sulphur dioxide from stationary sources and is based on absorption in liquid phase. The method is listed as SMR for periodic and continuous monitoring of SO2 emission from IED- installations. The standards that are addressing AMS/ calibration standards for continuous monitoring are EN 15267 and EN 14181. Source: <a href="http://eippcb.jrc.ec.europa.eu/reference/BREF/ROM_FD_102013_online.pdf">http://eippcb.jrc.ec.europa.eu/reference/BREF/ROM_FD_102013_online.pdf</a>
91	Section 4.1.1 pg. 26		<ol style="list-style-type: none"> <li>1. The formula should be revised to include more flexibility.</li> <li>2. It is not possible to achieve the BREF values for each emission factor. The industry explains that if you reduce an emission factor it will increase another one.</li> <li>3. The requirement could be reinforced on the total number of points and in the same time the individual point system could be made more flexible.</li> </ol>	Rejected. The majority of stakeholders assessed the current formula as appropriate. One of the reasons is its flexibility. Higher emission in one parameter means that some of the emission parameters must be relatively low not to overpass the final score of 4. At the same time a paper producer is given opportunity for further correction and improvement (usually long term investment).
92	COD recycled fibre  Section 4.1.1 pg. 26		Differentiation between different paper products based on RCF should be reflected	Partially accepted: it was clearly stated during the AHWG Meeting that RCF fibre should be treated as feedstock of equal value as virgin fibre. The production specificity and emission parameters that are characteristic for the RCF fibre were taken into account.
93	SO2 recycled fibre  Section 4.1.1 pg. 26		Get more feedback from RCF mill operators	Accepted Note: During the criteria revision process JRC is building up an extensive database of stakeholders The willingness of industry to provide the feedback is voluntary and depends on individual stakeholder (or group of stakeholders).
94	NOx recycled fibre  Section 4.1.1 pg. 26		Get more feedback from RCF mill operators	See above

No.	Reference: - section/task -page	Subject of the comment	Comment	Response
95	CO2 recycled fibre Section 4.1.1 pg. 26	CO2 emission depend on the type of production	Get more feedback from RCF mill operators	See above
96	Section 4.1.1 pg.28		We suggest to adjust the reference values to ensure that all shall be within the BREF limits but in order to ensure a high degree of flexibility we should not change the reference value too much. But it is important to make the requirements stricter. We suggest to achieve this by adjusting the limit values from 1.5 per parameter to 0.8 and the total from 4 to 2.5. Example for COD for chemical pulps which is 18. The maximum today would be 1.5 x18= 27. By maintaining the COD value at 18 but adjusting the limit value the maximum emission would be 0.8x18= 14.4 which indicate an overall strengthening of the requirement.	Partially accepted: The revised proposal has been developed and presented in TR2
97	Section 4.1.1 pg.28-29	Table 7:Emissions to water and air – proposed criteria for COD, P, S and NOx	Table 7 (p.27-28) and Table 14 (p. 42): Preference Paper (non-integrated mills where all pulps used are purchased market pulps) = 0,003 – 0,0045 kg P/ADtPaper (other mills) Preference = 0,003 – 0,0045 kg P/ADtThe figures are not in agreement with the proposal in page 46: “A new reference emission value within the range of 0,003 - 0,01 kg P/ADt should be considered for the further discussion.”Correct tables accordingly	Accepted: typo mistake yet clarified during the AHWG Meeting and corresponding minutes

No.	Reference: - section/task -page	Subject of the comment	Comment	Response
98	Section 4.1.1 pg.28-29	Table 7:Emissions to water and air – proposed criteria for COD, P, S and NOx	<p>1. Table 7 (p.27-28) and Table 14 (p. 42):Preference Bleached chemical pulp (others than sulphite) = 0,01-0,03 kg P/ADtBleached chemical pulp (sulphite) = 0,01-0,03 kg P/ADtUnbleached chemical pulp = 0,01-0,02 kg P/ADtCTMP = 0,001-0,01 kg P/ADtTMP = 0,001-0,01 kg P/ADtRecycled fibre pulp = 0,001-0,01 kg P/ADtPaper (non-integrated mills where all pulps used are purchased market pulps) = 0,003 – 0,0045 kg P/ADtPaper (other mills) Preference = 0,003 – 0,0045 kg P/AD</p> <p>2. The criteria reference must be the higher end of the proposed range since it is already in BREF range, represents already an ambitious reduction of 33% and more stringent requirement would translate in additional burden to other environmental aspects and cost without a major improvement on associated environmental impact</p> <p>3. •Eutrophication is a minor impact category in overall Life Cycle Analysis of paper, therefore additional reductions don't reflect on significant overall environmental impact reduction;• Additional removal of P is only possible with chemical precipitation (tertiary treatment) with recognised cross-effects and additional impacts: increased sludge production with metals, metals presence in final effluent, increased energy consumption and additional costs that should be channelled for improvement in other areas;• mills running with compact treatments can originate higher levels of nutrients in final discharged effluent. Compact treatments (such as Moving Bed Biofilm Reactor) present several advantages such as lower energy consumption and lower retention time (smaller area footprint) with good organic load reduction, nevertheless the lower retention time induce the need for higher level dosage of nutrients reflecting higher nutrient levels. The need for this higher level is also justified because this treatment plants have a lower “buffering” capacity to respond to process and effluent quality changes such as change of wood species or stoppage of an area of the mill;• The COD reduction has as cross effect the surplus of nutrients and the rise of their level on final effluent when there is no longer adjustable the dose;• In a pulp mill the almost unique entrance of phosphorus is the wood, when there is high level of P present in raw effluent no nutrients are addedSEE detailed issue note Criteria applied for CGP, tissue and newsprintPreferenceBleached chemical pulp (others than sulphite) = 0,03 kg P/ADtBleached chemical pulp (sulphite) = 0,03 kg P/ADtEucalyptus bleached chemical pulps (or where it can be demonstrated that the higher level of P is due to P naturally occurring in the wood pulp[LM1] ) = 0,1 kg P/ADtUnbleached chemical pulp = 0,02 kg P/ADtCTMP = 0,01 kg P/ADtTMP = 0,01 kg P/ADtRecycled fibre pulp = 0,01 kg P/ADtPaper (non-integrated mills where all pulps used are purchased market pulps) = 0,01 kg P/ADtPaper (other mills) Preference = 0,01 kg P/ADt</p>	<p>Rejected: We agree that the emission reference values should be derived from BREF that represents European pulp and paper state of the art. When analysing the threshold values for the EU Ecolabel purposes it should nevertheless be considered that in accordance with Article 14(3) of Directive 2010/75/EU, BAT conclusions are to be the reference for setting permit conditions for installations. The upper BAT AELs will be obligatory for the European pulp and paper industry from 2018 (within 4 years of publication of decisions on BAT 2014/687/EU). The BAT conclusions concern the activities specified in Sections 6.1.(a) and 6.1.(b) of Annex I to Directive 2010/75/EU, i.e. the integrated and non-integrated production in industrial installations of: (a) pulp from timber or other fibrous materials; (b) paper or cardboard with a production capacity exceeding 20 tonnes per day. Following EU Ecolabel principles the proposed reference values need to be more demanding than the obligatory level. We agree that the proposed reference values should represent a holistic approach and remain achievable for the current license holder. For that reason it has been discussed to contrast the proposed emission values with those reported by the current license holders and stated as a feedback to the questionnaire sent by JRC. Revised proposal is included in TR2.</p>
99	Section 4.1.1. pg. 28	7,0 – 16,0	The COD reference value in the table should be kept at the upper level. Replace the interval given by the upper value. The upper level already represents a reduction and tougher requirements would mean additional burden and cost without a major improvement on associated environmental impact.	See above

No.	Reference: - section/task -page	Subject of the comment	Comment	Response
100	Section 4.1.1. pg. 28	0,01-0,03	The P reference value in the table should be kept at the upper level. Replace the interval given by the upper value. The upper level already represents a reduction and tougher requirements would mean additional burden and cost without a major improvement on associated environmental impact.	See above
101	Section 4.1.1. pg. 28	0.1-0,4	The S reference value in the table should be kept at the upper level. Replace the interval given by the upper value. The upper level already represents a reduction and tougher requirements would mean additional burden and cost without a major improvement on associated environmental impact.	See above
102	Selected Text 3, 1, 1 pg. 28 Section 4.1.1. pg. 28		Thank you for recognizing the need for a higher COD limit for sulphite pulp. This indeed matches to our production.	Accepted
103	TR Table 7. Emissions to water and air – proposed criteria for COD, P, S and NOx, p. 28 Section 4.1.1 pg.28		<p>1. The temptation is high to consider the limits reported in the BREF as a consistent base for evaluation and level ambition for Ecolabel. The fact is that the BREF “has done the job”, ahead of Ecolabel revision process for paper products: the BREF compliance has determined the investment program of industry in current period. Moreover, in many case (COD, P, AOX ...) there is no new technology supporting change of criteria. In addition, there is no effective consideration for “hot spots” – which are however the target of a revision process. Ecolabel multi-criteria evaluation system needs a holistic approach.</p> <p>2. The proposal revision process focuses on individual emissions values, instead of taking in account a general end-product performance, which could be usefully achieved by adapting the current flexible scoring system (instead of systematically lowering values).Currently: A, B, C, D at 1.5 maxi; total &lt; 4.0. A proposal [to be checked with stakeholders]:a) To integrate AOX (as E);b) To adapt the maxi (1.5) and/or the total of points (4.0) ?</p>	<p>1. We agree that the emission reference values should be derived from BREF that represents European pulp and paper state of the art. Following EU Ecolabel principles the proposed reference values need to be more demanding than the obligatory level.</p> <p>2. Accepted: We consider that EU Ecolabel reference values should not exceed BAT –AELs. The scoring system grants pulp and paper manufacturer certain flexibility addressing the emission from an integrated perspective (e.g. performing very well in one parameter allows higher emission in the other, as long as each parameter is not higher than 1.5). We agree that the possibility to include AOX emission from ECF pulp in the scoring system should be further investigated. In this case, the total number of point will need to be mathematically adapted to reflect the current approach.</p>
104	Section 4.1.1 Table 7 pg. 28	1,0-1,5	The NOx reference value in the table should be kept at the upper level. Replace the interval given by the upper value. The upper level already represents a reduction and tougher requirements would mean additional burden and cost without a major improvement on associated environmental impact.	See above: General comment concerning the BAT AELs upper values.
105	Section 4.1.1 pg.28-29	Table 7:Emissions to water and air – proposed criteria for COD, P, S and NOx	<p>Bleached CTMP (BCTMP) pulp emission levels have not been considered. The pulp &amp; paper BREF document recognizes the increased emissions in table 5.5 on page 504. (see below) BCTMP emissions of COD can be 130%-200% higher than non-bleached CTMP pulps. Also graph 5.9 shows the effect of bleaching on the COD levels for CTMP pulps.BCTMP pulp reference values:COD = 20kg/ADtP = 0,001-0,01 kg/ADtS = 0,1-0,4 kg/ADtN = 1,0-1,5 kg/ADtAOX = 0,01kg/ADt</p> <p><i>Note: Supporting documentation (e.g. table, figures) submitted along with the comment made can be found in the ‘Supporting Documentation’ section at the end of this document.</i></p>	Partially accepted: the values have been cross checked with information received from the license holders and also reference values used by the Nordic Swan.

No.	Reference: - section/task -page	Subject of the comment	Comment	Response
10 6	Section 4.1.1 pg. 28	The total number of points (Ptotal = PCOD + PS + PNOx + PP) shall not exceed 4,0.	Why are AOx not taken into account in the formula?	Accepted: We agree that the possibility to include AOX emission from ECF pulp in the scoring system should be further investigated. In this case, the total number of point will need to be mathematically adapted to reflect the current approach
10 7	Section 4.1.1 pg.28-29	Table 7:Emissions to water and air – proposed criteria for COD, P, S and NOx	Table 7. Emissions to water and air – proposed criteria for COD (column on page 28) Proposed criterion upper range levels are below BAT upper range and proposed lower range levels are extremely low compared to the existing criterion. Significant and important additions in the footnote of BAT-AEL tables haven't been noted: e.g. COD level of highly bleached mechanical pulp (70-100% of fibre in final paper).Current effluent treatment plants work efficiently by reducing COD and there's no new technology supporting change of criteria. COD doesn't rise as major issue in LCA's.BAT emission levels are valid for normal operating conditions. Therefore annual emission figures of mills operating according to "BAT" (including emissions of start-up and disturbance situations) can be higher than the BAT levels. In EU Ecolabel calculations also those shall be taken into account and the current economic situation leads unfortunately shorter production runs meaning more shut-downs and start-ups, resulting higher COD. The market is decreasing for 2 out of 3 paper criteria, thus investments (and there are no new technology available) can't be justified with gained environmental benefits. To keep the existing limit values.	Rejected: We consider that EU Ecolabel reference values should not exceed BAT –AELs. The scoring system grants pulp and paper manufacturer certain flexibility addressing the emission from an integrated perspective (e.g. performing very well in one parameter allows higher emission in the other, as long as each parameter is not higher than 1.25).
10 8	Section 4.1.1 pg.28-29	Table 7:Emissions to water and air – proposed criteria for COD, P, S and NOx	The phosphorus levels for papermaking in table 7 and table 14 are wrong. On page 46 the correct new reference values are proposed: 0,003-0,01 kg P/ADT. The phosphorus levels for papermaking in table 7 and table 14 should be 0,003-0,01 kg P/ADT	Accepted: typo mistake yet clarified during the AHWG Meeting and corresponding minutes



No.	Reference: - section/task -page	Subject of the comment	Comment	Response
109	Section 4.1.1 pg. 30	Rationale	<p>The chapter “Rationale “The NOx reduction technologies are energy intensive The primary NOx reduction technologies are based on injecting water or simply cooled exhaust gas into the combustion chambers in order to prevent the oxidation of N2, which reduces the efficiency. The SCR technologies also consume urea and ammonia that are produced through a very energy intensive Haber-Bosch process. Since climate change is high on the priority list of the impact categories, these adverse impacts must be taken into consideration. The main driver for NOx reduction technology is respiratory health The rationale correctly recognizes that advanced technology for NOx reduction exists. It is being applied at manufacturing sites located close to urban areas where the main contributor to high NOx concentrations is traffic. The example plant of Lahti Energy is located very close to a city centre and a major highway. The technologies on the page 36 are not suitable as benchmark to paper and pulp industry and their energy efficiency should be taken into consideration. The NOx levels outside of urban agglomerations are low The NOx levels are low in rural areas and the local not justified. While EEA has discontinued the NOx indicator (source), the PM2.5 concentrations are the best indicator for air quality. It shows that the geographic variation is large:<a href="http://www.eea.europa.eu/themes/air/interactive/pm2_5">http://www.eea.europa.eu/themes/air/interactive/pm2_5</a>The share of NOx emissions from industrial production is low For NOx emissions, the main source is road traffic. Industrial production and energy use in industrial production is a minor contributor, in Europe 12.2% and 2,6%, respectively (source EEA 2013).A tight NOx criteria would in European conditions be selective in regard to a distance between the production facility and an urban agglomeration or a major highway (NOx levels).The recovery of surface waters In Europe and North America, the surface waters are recovering from acidification due to reduction of sulphur and nitrogen oxide emissions in the past decades. The acidifying impact of nitrogen oxide emissions is local and depends on the total level of NOx emissions and the state of the local surface waters. (Source Valinia et al: Proceedings of the 31st Task Force meeting of the ICP Waters. Programme in Monte Verità, Switzerland, October 6-8, 2015. ICP Waters Programme Centre and Norwegian Institute for Water Research, 2016).Regulating NOx Location independent requirements to reduce NOx emissions might bring little environmental benefits if the NOx levels are low and the surface water in the region does not suffer from significant acidification. A tight NOx criteria would be also a driver for increasing fuel consumption and CO2 emissions. That would be justified if there would be strong evidence of environmental benefits in regions with low NOx levels. To reconsider the proposal on NOx reference values</p>	Revised proposal has been included in TR v.2
110	Section 4.1.1.1 pg. 30	Table 10:Current and proposed reference levels for emissions of S-compounds (kg/ADt)	There is always sulphur ending up into the recovery boiler in a sulphite process. The current requirement of 0.6 kg/adt is already tight for sulphite pulp. To keep the reference value at 0.6 kg/adt for sulphite pulp.	Rejected: The S reference value for kraft pulp has been revised according to information contained in BREF, and adapted to the general approach of 80% of BAT-AELs values

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
11 1	Entire Section 3, 1, 1 30-31		<p>Opinion concerning the sulphur dioxide emissions of the cogeneration plant in Greiz (production site of the EU Ecolabel owner Papierfabrik August Koehler SE) Dear Sirs, Please find below our opinion concerning the sulphur dioxide emissions of the cogeneration plant in Greiz (production site of the EU Ecolabel owner Papierfabrik August Koehler SE).The boiler, that was constructed in 2010 is designed for a rated thermal input of 16, 7 MW. Fuel of the boiler is pulverized lignite from the Lusatia region, which is located close to Greiz. The fuel specification defines a sulphur content of &lt; 0, 8 % by weight. With this proportion a raw gas sulphur dioxide content of 2.000 mg/Nm<sup>3</sup> is calculated for the flue gas. The valid operating permit of the boiler complies with the German TA-Luft. The German TA-Luft defines a limit for sulphur dioxide emissions of maximum 1.000 mg/Nm<sup>3</sup> for the flue gas. In the valid legal approval, Koehler Greiz voluntarily committed themselves to the limit for sulphur dioxide content of max. 950 mg/Nm<sup>3</sup>.Flue gas desulfurization in this scale is typically working as a dry adsorption. The addition of limestone downstream the combustion supports the encapsulation of the sulphur dioxide in the ash, which is then deposited by the fabric filters. Within the scope of the first certification for the EU-Eco-Label in the year 2014, Koehler Greiz implemented an additional flue gas desulfurization. A part-flow of the ash downstream the limestone injection, is partly recirculated into the flue gas with the help of a new sorption installation. With this installation Koehler Greiz achieve a sulphur dioxide content of 650 mg/Nm<sup>3</sup> using residual sorbents. This fact results in a grade of flue gas desulfurization of almost 70%.In the BAT-documents the dry adsorption is mentioned as state of the art for power plants with a rated thermal input of &lt; 100 MW. In this context the power plant of Greiz corresponds to the state of the art (BAT).Without additional measures, which are not state of the art, it is not possible to limit the maximum of sulphur dioxide content to 400 mg/Nm<sup>3</sup>.Concerning new power plants in the range from 50 to 100 MW rated thermal input, the BAT documents agree with the maximum allowed sulphur dioxide content of 400 mg/Nm<sup>3</sup>. This means, new plants 3 to 6 times bigger than the plant in Greiz have to achieve the maximum sulphur dioxide content of 400 mg/Nm<sup>3</sup>.In our point of view, the determination of new limitations for sulphur dioxide content of 400 mg/Nm<sup>3</sup> along with the continuous measurements of the sulphur dioxide are not appropriate for the cogeneration plant in Greiz. The expected measures to meet these requirements do not satisfy the proportionality principle of the German BImSchG and TA-Luft. In the specific case there may be no harmful environmental impact expected.Regards,Papierfabrik August Koehler SE</p>	Thank you for the clarification. Revised proposal has been included in TR v.2.0
11 2	Section 4.1.1 pg.31	The fuel was assumed to be either natural gas or biomass	In some countries like Sweden, natural gas is not used as fuel. 96 % of fuel used in production of heat is bioenergy. In other countries, like Italy, it is the just the opposite. To clarify that fuel use is mainly dependant on local availability and it also depends on the kind of process and raw material used.	Accepted: the objective of EIU Ecolabel revision is to find out the right balance which is representative for the EU-28.

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
11 3	Section 4.1.1 pg.31	Given the issues mentioned, redesigning the methodology for calculating energy consumptions and emissions might be advisable	The method of calculating the consumption of energy and air emissions should be unchanged. Note: If you change the methodology for calculating the energy consumption and emissions, excel sheet should be developed for competent bodies use.	Accepted
11 4	Section 4.1.1. pg. 28		There is always sulphur ending up into the recovery boiler in a sulphite process. The current requirement of 0.6 kg/adt is already tight for sulphite pulp. The typical values are 0.6 to 1.4 kg/adt.	Rejected: The S reference value for kraft pulp has been revised according to information contained in BREF, and adapted to the general approach of 80% of BAT-AELs values
11 5	Section 4.1.1.1.2 pg. 33	The stakeholders are kindly asked if more information could be provided		
11 6	Section 4.1.1.1.3 pg.33	It is to be discussed with stakeholders if the possible emissions value could be established as zero, or there is a need to introduce more flexible approach.	No, many recycled fibre mills have anaerobic waste water treatment which generates biogas with S. Also many recycled fibre mills have biomass boilers to valorize the energy content of the deink sludge. This biomass also contains S.	Accepted
11 7	Section 4.1.1.1.3 pg. 34	It is to be discussed with stakeholders if the possible emissions value could be established as zero, or there is a need to introduce more flexible approach.	We don't understand the rationale behind the proposal. In the current criteria it is supposed that the heat consumption of the mechanical pulp production is zero and therefore also the S and NOx emissions are zero (the emissions from the electricity production is not taken account). The reference values for mechanical pulp production, both in EU Ecolabel and Nordic Ecolabel refer to the drying process of the market mechanical pulp. For such the fuel consumption is not zero and if the bark and wood residues are sold then fossil fuels may be used for the drying and there will be NOx, S and CO2 emission from the heat production.	Accepted: The previous proposal has been revised.
11 8	Section 4.1.1.1.4 pg. 34	Emissions of S-compounds for natural gas combustion are negligible.	Not all countries have access to natural gas and coal is still used in many countries outside Europe. This parameter cannot be set to zero but must be updated.	Accepted

No.	Reference: - section/task -page	Subject of the comment	Comment	Response
119	Section 4.1.1.1.4 pg. 34	Emissions to air from paper recycling originate mainly from energy generation (steam and electricity) and less from the manufacturing process itself.	We don't understand the meaning. The air emission from the manufacturing process are raised because of the heat used in the process. They are calculated from the amount of steam used at the manufacturing process, in fact.	Accepted: The proposal has been revised
120	Section 4.1.1.1.5 pg. 34	Nevertheless the availability of the natural gas across EU-28 should be taken into account. It is to be considered if revised criteria should give more flexible approach for those Member States that because of existent infrastructure rely on fossil fuels.	Our experience is that even in those European countries that have access to natural gas, coal is coming back, especially in the C&G paper area. Natural gas is more commonly used for tissue paper production. There seems to be a connection between the price of natural gas and the increase of the use of coal. Please bear in mind, as well, that also paper made outside Europe can apply for an EU Ecolabel. So there shall be a reference value for S in paper.	Accepted
121	Section 4.1.1.2 pg.35	Table 1: Current and proposed reference levels for specific emissions of NOx (figures in kg/ADt)	The proposed NOx reference values for non-integrated mills is based on mills that only use natural gas as fuel. Mills that use biomass as fuel require a higher reference value.	Accepted with comment: We agree that the revised threshold for NOx emission should address the average European scenario and the type of technology used.

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
12 2	Section 4.1.1.2 pg.35	Table11:Current and proposed reference levels for specific emissions of NOx (figures in kg/ADt)	<p>1. The technical report suggests to lower the reference levels for NOx emissions from 0,8-0,5 to 0,03-0,24 kg/adt in paper production (reduction of 96-52%) and from 1,6 kg/adt to 1,0-1,5 kg/adt in pulp production (reduction 37-6,3%). The BREF range is 1,10-2,05 kg/adt pulp, excluding biomass combustion. While setting the reference values, the BREF levels should be taken into account, also considering the emissions originating from biomass combustions. At many mills with a high integration level, this is a major source for NOx emissions.</p> <p>2. The proposed NOx reference values for non-integrated mills is based on mills that only use natural gas as fuel. Mills that use biomass as fuel require a higher reference value.”</p>	<p>1. Partially accepted: We agree that the emission reference values should be derived from BREF that represents European pulp and paper state of the art. When analysing the threshold values for the EU Ecolabel purposes it should nevertheless be considered that in accordance with Article 14(3) of Directive 2010/75/EU, BAT conclusions are to be the reference for setting permit conditions for installations. The upper BAT AELs will be obligatory for the European pulp and paper industry from 2018 (within 4 years of publication of decisions on BAT 2014/687/EU). Following EU Ecolabel principles the proposed reference values need to be more demanding than the obligatory level. We agree that the proposed reference values should represent a holistic approach and remain achievable for the current license holder. For that reason it has been discussed to contrast the proposed emission values with those reported by the current license holders and stated as a feedback to the questionnaire sent by JRC.</p> <p>2. Accepted: The reference values for non-integrated mills has been revised to address different scenarios.</p>
12 3	Section 4.1.1.2.1 pg.35	Figure 5:Total NOx emission load (as NO2/ADt) from major processes (recovery boiler, lime kiln, NCG burner)	In BREF, the NOx generated by the non-gas boilers are not accounted for. Therefore the BREF values should not be taken as a reference for the EU Ecolabel. To do not use the BREF data to set the reference values for NOx	<p>Rejected: The technical analysis conducted during BREF development is an appropriate source of reference and information. It represents European pulp and paper state of the art and is based on an extensive consultation process within industry, Members States, NGOs.</p> <p>Following the consultation with BREF expert only NOx contribution from combustion plants/ energy production is not taken into account (out of the scope).</p> <p>The NOx values in force derive from BREF 2001. The revision is proposed to be based on the holistic approach inspired by revised BREF (2015), other available sources (e.g eco-label schemes), and also extensive stakeholders consultation.</p>

No.	Reference: - section/task -page	Subject of the comment	Comment	Response
12 4	Section 4.1.1.2.5 pg.37	Similarly to the sulphur emission (see Table 10), it is proposed to base a preliminary proposal on the theoretical benchmark estimation which is consistent with the ETS methodology of 0,03-0,24 kg NOx/ADt.	The proposed limit for NOx is particularly penalizing for tissue, since it is the most energy intense process in paper industry, as demonstrated by the highest ETS benchmark. SCR technology is usually not suitable for tissue industry, especially for existing installations. Combustion control systems are the most widely used for the NOx abatement, but for many installations the NOx reduction is in competition with CO emissions, that very often has limits set by law. We ask to avoid to revise the criteria introducing non feasible reduction in thresholds	
12 5	Section 4.1.1.2.5 pg. 37	BAT 10 indicates the frequency of monitoring of parameters that addresses emission into water. The recommended monitoring frequency should be conducted daily for COD, and once a week for Monitoring frequency of AOX emission should be conducted once a month for bleached kraft pulp or once every two months for the other types of bleached pulp. The criterion assessment and verification has been adapted accordingly	<p>1. We don't agree. The measurements of COD, P and AOX from the production of chemical pulp shall be measured once a week. Our experience is that it is done so in the most chemical pulp mills. The tests may be done once a month if the samples are frozen but the samples must be 24 h samples taken once a week for each of the parameters. This is because the variation in the content of the different parameter can vary a lot and actually, if the required sampling frequency is too low the applicant can choose which test result they report to CB.</p> <p>2. If the pulp is TCF then you don't need to measure AOX at all.</p>	<p>1. Rejected: We propose to harmonise monitoring frequency with the indication of BAT 10 according to 2014/687/EU</p> <p>2. Accepted</p>
12 6	Section 4.1.1.3 pg.38	0,15-1	In table 13 the row for "non-integrated mills" referring to tissue paper shows a different range for COD emissions compared with the row "other mills". The two ranges should have the same span of values (0.15-1.5) as described at page 42: "For tissue paper the upper value is suggested to be raised to 1,5 kg COD/ADt".	

No.	Reference: - section/task -page	Subject of the comment	Comment	Response
127	Section 4.1.1.3 pg.38	Table 13. Current and proposed new reference levels for specific emissions of COD (all figures in kg COD /ADt)TMP: 0,9-3Paper: 0,15-1	COD hasn't be seen as the critical indicator in the past. It should be enough to reach the upper BAT levels. Huge investments can't be justified with gained environmental benefits. Existing criteria level for COD could work also in future. Table 13. Current and proposed new reference levels for specific emissions of COD (all figures in kg COD /ADt)TMP: 3Paper: 1	Rejected: The reference values have been revised following the information and data collected during the revision process
128	4.1.1.3. Reference emissions loads for COD Pg.. 38		For Sulphate mills, the maximum COD should be set to 12, as 20-40 % of the EU mills can achieve this level according to the EKONO study. For Sulphite mills, the COD level should be set to 10, as the 50th percentile of accumulated production is 12 according to Ekono benchmarking study. The proposed level of 25 can be reached by 95% of the European mills.	Clarification: see above
129	Section 4.1.1.3.3 pg. 40	Can you provide more information about specific COD emissions (kg/ADt) from CTMP (chemithermomechanical pulping mills to complement the limited data available from BREF questionnaires?	Our licence holders do not use CTMP, therefore we cannot provide such information	Accepted
130	Section 4.1.1.4.1 pg.43	3.1.1.4 Reference emissions loads for P	This chapter does not consider the BREF footnote for Eucalyptus pulps. Eucalyptus pulps typically have a higher Phosphorus level compared to other wood species. This level for Phosphorus would eliminate the use of most Eucalyptus pulps on the market for inclusion in Ecolabel products. Ptot reference for Eucalyptus pulp is 0,1kg/ADT	Accepted: as discussed during the AHWG Meeting the specific nature of Eucalyptus pulp will be taken into account.

No.	Reference: - section/task -page	Subject of the comment	Comment	Response
13 1	Section 4.1.1.4 pg.43	Eucalyptus contains more phosphorus and hence gives higher P-loads in untreated waste water.	Phosphorus emissions The inclusion of the phosphorus emissions as an Ecolabel criterion for copy and graphic papers, should consider the specificity of the different raw materials used in this paper sector by European producers. Iberian pulp producers use as it main raw material, wood from Eucalyptus globulus. The Iberian pulp of Eucalyptus globulus is mainly used in the production of copy and graphic paper and for Tissue paper. It is a fact that Portuguese Eucalyptus globulus wood presents intrinsically higher phosphorus content than other short fibre species used for papermaking. It is also known that Phosphorus may be added by pulp and paper mills in its wastewater treatment, namely on the biological treatment. Portuguese pulp and paper mills do not add any phosphorus in its biological effluent treatment. The content of this element on the wood is already enough to guarantee the performance of the wastewater biological treatment. Reducing the phosphorus content of those emissions would imply the used of other chemical substances to reach phosphorus precipitation (tertiary treatment), which is an environmentally questionable solution since it would increase the solid waste production, implies the use and presence of metals such as Aluminium and increase of energy consumption. Portuguese pulp and paper mills operate in Portugal for more than 55 years, without track record of environmental damages due to phosphorus content in the wastewater emissions. All Portuguese pulp and paper producers have environmental permit according with Industrial Emissions Directive (IED).The exception for Eucalyptus pulps, on the parameter of phosphorus content in the wastewater emissions, is already previewed and stated on the Reference Document on Best Available Techniques in the Pulp and Paper Industry, published last year. The inclusion of the phosphorus emissions as an Ecolabel criterion for copy and graphic papers and for Tissue papers, should be aligned with what is already consider in the Reference Document on Best Available Techniques in the Pulp and Paper Industry, under the IED Directive, in order to guarantee the necessary compatibility and coordination between these two instruments of the environmental European policy.	Accepted: as discussed during the AHWG Meeting the specific nature of Eucalyptus pulp will be taken into account
13 2	Section 4.1.1.4.1 pg.44	Figure 12	It is questionable whether conclusion that “most of the environmental impacts of paper products will be associated with material sourcing, pulping...” can be taken from picture which doesn’t mention pulping at all.	???
13 3	Section 4.1.1.4. pg. 44	Table 14:Current and proposed new reference levels for specific emissions of phosphorus (all figures in kg P/ADt)	Table 14: The phosphorus levels for papermaking in table 7 and table 14 are wrong. On page 46 the correct new reference values are proposed: 0,003-0,01 kg P/ADT The phosphorus levels for papermaking in table 7 and table 14 should be 0,003-0,01 kg P/ADT	Accepted: typo mistake yet clarified during the AHWG Meeting and corresponding minutes



N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
13 4	Section 4.1.1.4 pg. 44	Table 14:Current and proposed new reference levels for specific emissions of phosphorus (all figures in kg P/ADt)	Table 7 (p.27-28) and Table 14 (p. 42): Preference Paper (non-integrated mills where all pulps used are purchased market pulps) = 0,003 – 0,0045 kg P/Adt Paper (other mills) Preference = 0,003 – 0,0045 kg P/Adt The figures are not in agreement with the proposal in page 46: “A new reference emission value within the range of 0,003 - 0,01 kg P/ADt should be considered for the further discussion.”Correct tables accordingly	Accepted: See above
13 5	Section 4.1.1.4 pg. 44	Table 14:Current and proposed new reference levels for specific emissions of phosphorus (all figures in kg P/ADt)	Table 1 (p.27-28) and Table 14 (p. 42):Preference Bleached chemical pulp (others than sulphite) = 0,01-0,03 kg P/ADtBleached chemical pulp (sulphite) = 0,01-0,03 kg P/ADtUnbleached chemical pulp = 0,01-0,02 kg P/ADtCTMP = 0,001-0,01 kg P/ADtTMP = 0,001-0,01 kg P/ADtRecycled fibre pulp = 0,001-0,01 kg P/ADtPaper (non-integrated mills where all pulps used are purchased market pulps) = 0,003 – 0,0045 kg P/ADtPaper (other mills) Preference = 0,003 – 0,0045 kg P/ADtThe criteria reference must be the higher end of the proposed range since it is already in BREF range, represents already an ambitious reduction of 33% and more stringent requirement would translate in additional burden to other environmental aspects and cost without a major improvement on associated environmental impact:•Eutrophication is a minor impact category in overall Life Cycle Analysis of paper, therefore additional reductions don't reflect on significant overall environmental impact reduction;• Additional removal of P is only possible with chemical precipitation (tertiary treatment) with recognised cross-effects and additional impacts: increased sludge production with metals, metals presence in final effluent, increased energy consumption and additional costs that should be channelled for improvement in other areas;• mills running with compact treatments can originate higher levels of nutrients in final discharged effluent. Compact treatments (such as Moving Bed Biofilm Reactor) present several advantages such as lower energy consumption and lower retention time (smaller area footprint) with good organic load reduction, nevertheless the lower retention time induce the need for higher level dosage of nutrients reflecting higher nutrient levels. The need for this higher level is also justified because this treatment plants have a lower “buffering” capacity to respond to process and effluent quality changes such as change of wood species or stoppage of an area of the mill;• The COD reduction has as cross effect the surplus of nutrients and the rise of their level on final effluent when there is no longer adjustable the dose;• In a pulp mill the almost unique entrance of phosphorus is the wood, when there is high level of P present in raw effluent no nutrients are addedSEE detailed issue note Table 1 (p.27-28) and Table 14 (p. 4244):Criteria applied for CGP, tissue and newsprintPreferenceBleached chemical pulp (others than sulphite) = 0,03 kg P/ADtBleached chemical pulp (sulphite) = 0,03 kg P/ADtEucalyptus bleached chemical pulps (or where it can be demonstrated that the higher level of P is due to P naturally occurring in the wood pulp) = 0,1 kg P/ADtUnbleached chemical pulp = 0,02 kg P/ADtCTMP = 0,01 kg P/ADtTMP = 0,01 kg P/ADtRecycled fibre pulp = 0,01 kg P/ADtPaper (non-integrated mills where all pulps used are purchased market pulps) = 0,01 kg P/ADtPaper (other mills) Preference = 0,01 kg P/ADt	Rejected: We consider that EU Ecolabel reference values should not exceed BAT –AELs. The scoring system grants pulp and paper manufacturer certain flexibility addressing the emission from an integrated perspective (e.g. performing very well in one parameter allows higher emission in the other, as lon as each parameter is not higher than 1.25).

No.	Reference: - section/task -page	Subject of the comment	Comment	Response
13 6	Section 4.1.1.4.1 pg.45	The specific emission threshold for eucalyptus pulp mills should be further discussed with industry stakeholders.	The exceptional levels for mills where the higher levels of discharged P are due to the wood P content are of extreme importance and relevant for Ecolabel since it affects not only Iberian producers but also users of Eucalyptus pulps coming from other world regions and could also be significant for pulp producer with extremely low COD levels. On the BREF process, the exemption was based on technical data supplied during its review. The same technical arguments justify the maintenance of the same approach on Ecolabel criteria. The main conclusions from BREF process were:• Detailed mill balances shows clear that in a pulp mill the almost unique entrance of phosphorus is the wood, when there is high level of P present in raw effluent no nutrients are added and therefore the discharged in final effluent is due to this natural occurring P;• There is a high natural variability of P wood content dependent of species, plant physiology soil and edafoclimatic conditions;• it must have exists exceptional levels for eucalyptus mills (situation already technically accepted by BREF BAT conclusions) or where the higher levels of discharged P are due to the wood P content.The Ecolabel criteria must have specific levels for eucalyptus pulps or where the higher level of discharged P is due to P naturally occurring in the wood pulp. See proposal for P criteria in former comment as proposal for a change.	Accepted: as discussed during the AHWG Meeting the specific nature of Eucalyptus pulp will be taken into account
13 7	Section 4.1.1.4.5 pg. 46	A new reference emission value within the range of 0,003 - 0,01 kg P/ADt should be considered for the further discussion.	In table 14 the threshold for P emissions for all papers in 0.003 -0.0045 kg/Adt. The ranges of table 14 should match the range described at page 46, § 4.1.1.4.5.	Accepted: typo mistake yet clarified during the AHWG Meeting and corresponding minutes
13 8	Section.1.1.4 pg. 41-47	3.1.1.4Reference emissions loads for P	Phosphorous and COD emission levels are interlinked. Phosphorus is required to regulate the levels of COD in the effluents. Eutrophication is not a relevant impact category in the most recent PEFCR for Intermediate Paper Products. The new proposed upper levels represent a reduction of up to 50% vs the current reference values. This level should not be further reduced. Keep the phosphorous emissions at the highest level to allow flexibility in the water treatment process	Partially accepted: We consider that EU Ecolabel reference values should not exceed BAT –AELs. The scoring system grants pulp and paper manufacturer certain flexibility addressing the emission from an integrated perspective (e.g. performing very well in one parameter allows higher emission in the other, as lon as each parameter is not higher than 1.25).

No.	Reference: - section/task -page	Subject of the comment	Comment	Response
139	Section 4.1.2 pg.47	Criterion 1b) AOX	During the 2011 revision of the EU Ecolabel criteria, the AOX emissions were lowered by 32% (from 0.25 to 0.17 kg/ADT of pulp).Please note the misinterpretation of the Paper Profile data in the preliminary report. The Paper Profile reports the AOX emissions per ADT of paper and not per ADT of pulp (see comments #1)Softwood species and hardwood species with high tannin content (in particular chestnut and oak) generate higher AOX levels as they require more bleaching chemicals than other species. Most integrated mills only use one pulp so do not have any flexibility. The average AOX value should therefore be kept at a level achievable with any wood species. Keep the current threshold of 0.17 kg/ADT for the pulp mix and allow up to 0.25 kg/ADT for each individual pulp used. The requirement would then be aligned with the most recent EU Ecolabel for Converted Paper Products.	Partially accepted: Revised optional proposal has been presented in TR2. Specific derogation is proposed to be granted to chestnut wood pulp (0,17 kg AOX/ADt)
140	Section 4.1.2 pg.47	AOX need not be measured in the effluent from non-integrated paper production or in the effluents from pulp production without bleaching or where the bleaching is performed with chlorine-free substances.	AOX is not a relevant parameter for non-integrated installations as paper mills do not use chlorine compounds for bleaching. Furthermore, these low levels of AOX are at the analytical detection limits making the measurements very unreliable. Moreover it has been proven in many studies that these very low AOX levels have no more impact on environment. To remove the value of 0.001 AOX for “Non –Integrated mills”.	Partially accepted: Revised optional proposal has been presented in TR2.
141	Section 4.1.2 pg.47	The AOX emissions from the production of bleached pulp shall not exceed the following values for each type of pulp	There is no need to include an AOX level for recovered fibre pulp. There is no way to control AOX content in paper for recycling used. To delete AOX limits for recovered fibre pulp	See above
142	TR 4.1.2. Criterion 1b) AOX, p.48		Tissue Paper Products: we support the option to align current threshold of 0.17 kg/ADT for the pulp mix and to allow up to 0.25 kg/ADT for each individual pulp used. There is absolutely no significant benefice in reducing this value. In addition, no benefice to add a value for (non)-integrated paper mill at 0.001 kg/ADT (!), which is at the analytical detection limit.	See above

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
14 3	4.1.2. Criterion 1b) AOX Pg.47		Experiences from several TCF producers as SCA and Sodra prove that for sulphate pulp mills an AOX level of zero (TCF) can be reached. New technological development are presented in the Wennerström study (2015) and show the advantages of TCF bleaching: • Lower brightness reversion• Lower OX content and DCM content in pulp• Lower water consumption• Lower colour and AOX content in the bleach plant discharge• Potential to fully close the bleach plant and reduce the effluent discharge to zero. • Lower investment and operating costs The EEB and BEUC highly recommend that pulp production should be TCF based bleaching. As a stepwise reduction of AOX to reach zero, sulphate mills should reach the level of 0,10 before 2020 and 0 before 2025.The above proposal is feasible since, according to the data collected by EIPPCB, in 2008/2009 around 50% of European mills that took part in the questionnaire met the AOX emission level of 0,15 AOX/kg ADt, and 27% less than 0,1 AOX/ADt. As 27% of the mills already reach a level of 0,10, this should be the starting point. According to the EKONO benchmarking study this level can be reached by 55% of the cumulative production of sulphate pulp. For Sulphite pulp, ECF bleaching is not considered as a BAT technology. Chapter 8.3.1 of the BREF document only describes TCF as BAT bleaching technology. Therefore, the AOX level should be zero, only TCF. According to EKONO benchmarking study 80% of the accumulative production is TCF.	See above
14 4	Section 4.1.2 pg. 47		While using waste paper as raw material no one can be assure to get AOX-poor fibres all the time. The proposed new AOX-value is factor 24 lower then currently. Set a new challenging but practicable AOX-value - same for all kinds of pulp like in the past (e. g. 0,1)For RCF: without any adding of AOX-generating additives during the process the AOX-value of the waste water is changing over the time - depending on the used waste paper quality. We use 100% waste paper for production of recycling paper.	See above
14 5	Technical Report 1.0 for the revision of EU Ecolabel criteria for paper products, page 48	Criterion 1b)AOX	We support the proposed values for AOX emission but there should be a further discussion, if these values are “reference values” to calculate “AOX emission points, what would be a new approach or if the values should be limit values for each individual pulp.	See above
14 6	Section 4.1.2. pg. 48	0,10-0,15	The AOX value in the table should be kept at the upper level. Replace the interval given by the upper value. The upper level already represents a reduction and tougher requirements would mean additional burden and cost without a major improvement on associated environmental impact.	See above
14 7	Section 4.1.2. pg. 48	0,10-0,15	The AOX value in the table should be kept at the upper level. Replace the interval given by the upper value. The upper level already represents a reduction and tougher requirements would mean additional burden and cost without a major improvement on associated environmental impact.	See above
14 8	Section 4.1.2. pg.48	0,10-0,15	The AOX value in the table should be kept at the upper level. Replace the interval given by the upper value. The upper level already represents a reduction and tougher requirements would mean additional burden and cost without a major improvement on associated environmental impact.	See above

No.	Reference: - section/task -page	Subject of the comment	Comment	Response
149	Section 4.1.2.2. pg.50	As the starting point it is proposed to reduce the emission limit to 0.002 kg AOX/ADt.	Chlorine bleaching chemicals are not used for bleaching of mechanical pulps and the AOX from these processes can be considered as negligible so please delete the proposal	Accepted: see above
150	Section 4.1.2.2. pg.50		The AOX emissions from the paper production are negligible compared to the AOX emissions from the chemical pulps, therefore we think that AOX does not need to be measured from the paper production	See above
151	Section 4.1.3 pg.52		Denmark suggests to change the requirement for the CO2 calculation. • CO2-emission factor shall be the European average. Using a national factor does not make scientific sense for several reasons. Firstly due to the fact that national grids are linked together and electricity is transported across borders. Secondly we need to consider the marginally produced electricity. Example: if more electricity is needed in Norway this will not originate from hydro power but most likely from power plants in Denmark using coal. • We also suggest to strengthen the requirement to deduct “green electricity” from the calculation. We suggest to harmonize with the principle from the newly voted TAS criteria – only accepting green electricity if installed within the last 2 years or guaranties to invest in new green electricity (Criterion 38 in TAS).	Partially accepted: The availability of “green energy” for industrial purposes is not unified across Europe. The EU average carbon intensity of the electricity grid proposed is harmonised with MEErP methodology- 0.384 tCO2/MWhe = 0.107 tCO2/GJe (MEErP).
152	Section 4.1.1 to 4.1.3 pg. 26 to 52	Criterion 1	Our license holders have expressed deep concern about a significant lowering of thresholds. Indeed, criteria are interconnected and lowering one criterion can result in increasing another criterion, and vice versa. Some types of wood require more processing, which can result in increased emissions. Significantly lowering thresholds could lead manufacturers to import from outside Europe in some cases, and emissions resulting from the transport would not be taken into consideration. We agree with the proposal to include AOX emissions in COD, S, P, NOx calculations. The total number of points should therefore be adjusted accordingly (currently = 4). The potential removal of the CO2 criterion must also be taken into account: if the new energy criterion is maintained, the total number of points should also be adjusted accordingly. We recommend to collaborate with manufacturers to find a total number of points (with AOX and without CO2 if the new energy criterion is maintained) that could be achieved, so that Ecolabel products could still be available on the market. These new proposals should be tested by members of the WG and manufacturers	Partially accepted: Revised proposal has been presented in TR2.
153	Section 4.1.3 pg.52		Are data available for each product group? The use of a standard emission factor for each country is may be not relevant. It may be best to maintain different emission factor according to the energy mix of each country.	Rejected: The EU average carbon intensity of the electricity grid proposed is harmonised with MEErP methodology- 0.384 tCO2/MWhe = 0.107 tCO2/GJe (MEErP).

No.	Reference: - section/task -page	Subject of the comment	Comment	Response
15 4	Section 4.1.3 pg.52	Criterion 1c) CO2	Criterion 1 c) on CO2 emissions and criterion 2 on Energy Use measure mostly same thing as CO2 emissions are generated in steam and electricity production. While Energy criteria can be seen as a technical criterion, CO2 is more a political one. We would encourage to only include one of these criteria and would prefer Criterion 2 on Energy as C=2 emission from the pulp and paper industry is intimately related to the energy intensity of the processes. If CO2 criterion will be kept, applicants should, in addition to using the EU average emission factor on purchased grid electricity, be allowed to use supplier specific emission factor for the purchased grid electricity. This would improve flexibility of the criteria and also create motivation to purchase electricity with lower CO2 profile if available. To omit criterion on CO2.	Partially accepted: Revised optional proposal has been presented in TR2
15 5	Section 4.1.3 pg.52 -53	Table 16:CO2 emissions criteria	CO2 proposed emission criteria Tissue emissions will always be higher than graphic or newsprint because of the much lower base weight of tissue paper. We ask to omit the criterion on CO2. In any case, tissue CO2 emissions could not be lower than 1500kg/ADT	
15 6	Criterion 1 c) CO2 Section 4.1.3 pg.52	Given that optimization of CO2 emissions is done by the optimization of energy use that is why PL suggests to remove the CO2 criterion entirely.	Comment: this criterion is overlapping with the energy criterion. Linking EU Ecolabel with EU ETS benchmarks is problematic given the fact that the benchmarks itself will be deeply analysed in the coming EU ETS revision for the period 2021-2030. That raises high level of uncertainty for paper producers operating in Member States with high share of coal in their energy-mix what is important the in-depth discussion on benchmarks is yet to come. The most important problem with EU ETS benchmarks is that natural gas was used as the reference fuel while setting them. Moreover, benchmarks are calculated on the basis of the average performance of the 10% most efficient installations that are sometimes not representative in terms of their capability to be applicable in all Member States while taking into account all geographical (and other) circumstances.	Accepted: Revised optional proposal has been presented in TR2

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
15 7	Section 4.1.3 pg.53	For grid electricity, the value quoted in the table above (the European average) shall be used unless the applicant presents documentation establishing the average value for their suppliers of electricity (contracting supplier or national average), in which case the applicant may use this value instead of the value quoted in the table.	We support this principle as This is a driver for developing and use of low carbon electricity generation Supplier data are primary data that always are in priority Energy systems are national and the development of the systems/grid has been paid in some way by the society including the industry We support this principle but is not relevant as we ask to omit the criterion on CO2	Accepted: Revised optional proposal has been presented in TR2

No.	Reference: - section/task -page	Subject of the comment	Comment	Response
158	Section 4.1.3 pg.53	The emissions of carbon dioxide from non-renewable sources shall not exceed xxx kg per tonne of paper produced, including emissions from the production of electricity (whether on-site or off-site). For non-integrated mills (where all pulps used are purchased market pulps) the emissions shall not exceed xxx kg per tonne. The emissions shall be calculated as the sum of the emissions from the pulp and paper production.	There should be no "bonus" for non-integrated mills for the CO2-emission like in the past. This is not suitable for RCF integrated mills. In the past non-integrated mills could emit 100kg more CO2 per ton than integrated. Normally integrated (RCF) mills need more energy than "simple" paper mills for deinking and other processes. It should be a special focus within the whole document that in	Accepted: Revised optional proposal has been presented in TR2
159	Section 4.1.3 pg.56	Table 19	Mechanical pulping is energy intensive and in most cases the production relies on grid electricity, but on the other hand mechanical pulping processes (GWP and TMP) have significantly higher yield than chemical pulping. Due to different processing, mechanical pulps have properties differentiating from chemical pulps, such as high bulk and opacity, which cannot in all end uses be substituted by chemical pulps. Without own reference value, products containing mechanical pulps would automatically be ruled out. We ask to omit the criterion on CO2. In any case, mechanical pulps cannot be have CO2 emissions at the same level of other pulps	Accepted: Revised optional proposal has been presented in TR2
160	Section 4.1.3 pg.56	EU ETS benchmark	EU ETS benchmark has been designed for a different purpose and industry does not consider it suitable reference in EU Ecolabel criteria.EU ETS and gas fired boiler shall not be used as a benchmark in EU Ecolabel.	Accepted
161	Section 4.1.3 pg.56		We think this criterion is abundant when CO2 criterion is already there. Unnecessary complexity.	Clarification: Revised optional proposal has been presented in TR2



N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
16 2	Section 4.1.3 pg.56	Q. Should the criterion be changed referring to the EU ETS benchmark?	EU ETS benchmark has been designed for a different purpose and industry does not consider it suitable reference in EU Ecolabel criteria. No, EU ETS and gas fired boiler shall not be used as a benchmark in EU Ecolabel.	Accepted
16 3	Section 4.1.3 pg.57	Q. Considering legal requirements (EU ETS), should emission requirement for CO2 be maintain under the EU Ecolabel criteria.	Apparently the EU ETS do not take into account the indirect CO2 emission (due to the heat and electricity production).	Accepted
16 4	Section 4.1.3 pg. 57		It may be not relevant because the production process are different according to the products. The Nordic label includes different thresholds.	Accepted
16 5	Section 4.1.3 pg.57	Q. Should the EU Members States that rely on carbon intensive fuel (grid) be given more flexible approach?	Mechanical pulping is energy intensive and in most cases the production relies on grid electricity, but on the other hand mechanical pulping processes (GWP and TMP) have significantly higher yield than chemical pulping. Due to different processing, mechanical pulps have properties differentiating from chemical pulps, such as high bulk and opacity, which cannot in all end uses be substituted by chemical pulps. Without own reference value, products containing mechanical pulps would automatically be ruled out. Keep current criteria and verification, allowing the applicant to choose between the use of European average as actual criterion or a supplier specific values	Accepted: Revised optional proposal has been presented in TR2
16 6	Section 4.1.3 pg. 57	Q. In case, the criterion is preferred to be kept in the current form, shall the reference value remain unchanged?	We agree on maintaining current form if the CO2 criterion is not omitted. We ask to remove the criterion on CO2	Partially accepted: Revised optional proposal has been presented in TR2
16 7	Section 4.1.3 pg.57	Q. Considering legal requirements (EU ETS), should emission requirement for CO2 be maintain under the EU Ecolabel criteria.	Criterion 1 c) on CO2 emissions and criterion 2 on Energy Use measure mostly same thing as CO2 emissions are generated in steam and electricity production. While Energy criteria can be seen as a technical criterion, CO2 is more a political one. Forest industry would encourage to only include one of these criteria and would prefer Criterion 2 on Energy as C=2 emission from the pulp and paper industry is intimately related to the energy intensity of the processes. We ask to remove the criterion on CO2	Partially accepted: Revised optional proposal has been presented in TR2

No.	Reference: - section/task -page	Subject of the comment	Comment	Response
168	Section 4.1.3. pg. 57	In case, the criterion is preferred to be kept in the current form, shall the reference value remain unchanged?	We prefer to keep the criterion in current form and for C&G paper the limits 1000 and 1100 kg/tonne paper are still valid. However, there should be an additional limit for the paper made of mechanical pulps. Moreover it should be stated clearly what is needed to verify that the producers is using renewable electricity (garanties of origin). The limit in tissue paper criterion is far too high and must be updated. It should also be mentioned here that the allocation equation (for co-generation) for air emission also applies for CO2. Many applicants don't connect CO2 to the "air emissions".	Partially accepted: Revised optional proposal has been presented in TR2
169	Section 4.1.3 pg.57	Considering legal requirements (EU ETS), should emission requirement for CO2 be maintain under the EU Ecolabel criteria	We suggest to exclude this criterion while simultaneously are functioning criteria for maximum energy consumption of heat and electricity so it is overlapping with the energy criterion. This was also supported by the fact that while the reduction in the consumption of heat and electricity is mainly a technical matter, the CO2 is largely determined by the geographical and political factors, which depend on the availability of each source of energy (fuel) in the region.	Partially accepted: Revised optional proposal has been presented in TR2
170	Section 4.1.3 pg.57	Should the criterion be changed referring to the EU ETS benchmark?	No, it shouldn't. It is unnecessary. Linking EU Ecolabel with EU ETS benchmarks is problematic especially taking into account paper producers operating in Member States with high share of coal in their energy-mix. The most important problem with EU ETS benchmarks is that natural gas was used as the reference fuel while setting them. Moreover, benchmarks are calculated on the basis of the average performance of the 10% most efficient installations that are sometimes not representative in terms of their capability to be applicable in all Member States while taking into account all geographical (and other) circumstances.	Accepted
171	Section 4.1.3 pg.57	Should the EU Members States that rely on carbon intensive fuel (grid) be given more flexible approach?	Yes, they should have more flexible approach, otherwise those Member States will be excluded from the Ecolabel scheme	Accepted: Revised optional proposal has been presented in TR2
172	Section 4.1.3 pg.57	In case, the criterion is preferred to be kept in the current form, shall the reference value remain unchanged?	Yes, it shall remain unchanged	Partially accepted: Revised optional proposal has been presented in TR2
<b>Comments relating to Criterion 2: Energy use</b>				

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
17 3	Section 4.2 pg. 58	Criterion 2:Energy use	Criterion 1 c) on CO2 emissions and criterion 2 on Energy Use measure mostly same thing as CO2 emissions are generated in steam and electricity production. While Energy criteria can be seen as a technical criterion, CO2 is more a political one. We would encourage to only include one of these criteria and would prefer Criterion 2 on Energy as C=2 emission from the pulp and paper industry is intimately related to the energy intensity of the processes. If CO2 criterion will be kept, applicants should, in addition to using the EU average emission factor on purchased grid electricity, be allowed to use supplier specific emission factor for the purchased grid electricity. This would improve flexibility of the criteria and also create motivation to purchase electricity with lower CO2 profile if available. To omit criterion on CO2.	Partially accepted: Revised optional proposal has been presented in TR2
17 4	Section 4.2 table 20 pg. 58	(b) Fuel (heat)	It is unclear what is meant: primary energy= fuel or secondary energy= heat? Clarification is needed.	Accepted
17 5	Section 4.2 pg. 58		<p>The EEB and BEUC would like to propose some improvements for this criterion. First of all, it would be crucial to address savings through energy efficiency and in this regard NGOs consider as important to introduce a mandatory CHP requirement. There should be a minimum fuel utilization cut off point. &gt;85% would be average. An efficient Combined Cycle gas turbine (CCGT) reaches 92% of fuel efficiency. The result would be 19t CO2/h for 90 tonnes steam output. See page 139 / Section 3.9.5/3.9.6  <a href="http://eippcb.jrc.ec.europa.eu/reference/BREF/PP_revised_BREF_2015.pdf">http://eippcb.jrc.ec.europa.eu/reference/BREF/PP_revised_BREF_2015.pdf</a></p> <p>Concerning the energy used, another important aspect is to promote on-site generation through renewable sources other than biomass, such as hydropower, wind, and photovoltaic. Electricity bought should be 100% 'green'. However, this option should only be considered beneficial if additionality is ensured, i.e. investments in new RES capacities. It is important to avoid that companies opt for cheap GO purchase instead of implementing energy efficiency measures or installing renewable energy generation capacities on site. As regards, the overall cap of CO2 kg per tonne of paper produced, the EEB and BEUC have some questions on how the limit has been suggested. If the criteria will not ask for green electricity at least they should refer to the last ENTSO-E mix, which is currently 340 and it is updated every year. This would be cutting off coal/lignite and oil powered plants (about 690g/CO2/KWh), something that NGOs highly recommend. NGOs would also like to see a ban on the use of peat. Criteria for the sustainable origin of any biomass used should be introduced. Where gas is used conversion to biogas should get a bonus + heat utilization rate for district heating. Manufacturers should also be requested mandatory reporting obligations on the share of fuel used. This information should be made available (see ENTSO <a href="https://transparency.entsoe.eu/generation/r2/actualGenerationPerGenerationUnit/show">https://transparency.entsoe.eu/generation/r2/actualGenerationPerGenerationUnit/show</a> for data on produced electricity and consumed fuel per plant). Manufacturers should report their ecological footprint online on the company website, as well as water and air emissions. These are binding obligations in any case.</p>	Rejected: Both energy consumption and CO2 emissions depend on the type of pulping process used and the degree of integrated production. The larger part of saving potential is found to be cost-effective from a firm's perspective. The most influential technologies were assumed to be heat recovery in paper mills and the use of innovative paper drying technologies. Nevertheless, the improvement potential needs to be assumed as limited due to the technology requirements. Following information found, around 56% of the energy requirements for the industry (heat and electricity) are met using biomass (CEPI, website). Fleiter et al., (2012) estimated energy to account for around 13% of total pulp and paper production costs. The pulp and paper sector is characterised by large scale, capital intensive plants and long investment cycles. Boilers and recovery boilers can have expected lifetimes of 30-40 years. This means that any radical shifts to technologies that offer improved energy efficiency is unlikely to occur on an industry-wide scale overnight, and that incremental improvements via upgrades are more likely. A mandatory CHP requirement might result in exclusion of other than chemical pulps. Furthermore, the EU average carbon intensity of the electricity grid proposed is harmonised with MEErP methodology- 0.384 tCO2/MWhe = 0.107 tCO2/GJe (MEErP).

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
17 6	Section 4.2 pg. 58	energy	Use data from BREF document with reference numbers, please check in the full document in sections: 2.5,2.6; 3.2.2.3; 3.3.27; 4.2.2.3; 5.2.2.7; 6.2.2.4, 7.2.2.4	Accepted
17 7	Section 4.2 table 20 pg. 59	Table 3. Reference values for electricity and fuel	Reference values for TMP, CTMP and recovered fibre pulp are missing. Reference values for Ground wood pulp is not in line with actual performances of the sector. Probably data between fuel and electricity are swapped.To propose values for TMP, CTMP and recovered fibre pulp. To modify reference values for Ground wood pulp To set reference values for TAD tissue paper	Accepted
17 8	Section 4.2 Table 20 pg.59	Table 3. Reference values for electricity and fuel	Recycled pulp for graphic paper and tissue needs more treatment than for newsprint. This is due to the need to further reduce the amount of dirt specks and to increase the brightness. More cleaning / preparation steps (e. g. more deinking loops, disperser) are needed. Therefore energy consumption is higher. To consider two separate values of energy consumption for recycled pulp depending on final use	Accepted
17 9	Section 4.2 pg.59	admp	The document use the term ADMP without including it in the definition list To add the definition of ADMP	Accepted
18 0	Section 4.2 pg. 61	The number of points, PF, shall be less than or equal to 1,5.	How the factor 1,5 has been fixed? In addition, this criterion should be developed in compliance with the work done by the dedicated Task force on energy.	Accepted: Revised proposal has been included in TR2
18 1	Table 4,2 pg.58 4.2 pg.. 61	Table 3 Reference values for electricity and fuel	recycled pulp for graphic paper needs more treatment and energy than for newsprint implement two (in the whole document strictly divided) RCF-rows: (1) recycled pulp for graphic paper (2)recycled pulp for newsprint to produce marketable graphic paper from recycled fibres the preparation of the pulp is more energy intensive then for newspaper. To reduce the amount of dirt specks and to increase the brightness for graphic paper the mills need more cleaning/preparation steps (e. g. more deinking loops, disperser) and so more energy per ton of paper.	Accepted
18 2	Section 4.2 pg. 63	Figure 17	The specific energy consumption has as a denominator the produced volumes, which are proportional to and extremely sensitive to the demand in the market. The improvement of efficiency 2008 onwards might be explained by the improved utilization rates of the paper machines and/or closures of paper mills rather than actual technical improvements. To include a justification of the trends	Clarification: Specific electricity consumption (MWh/t) in CEPI countries has been reduced by 18.7% between 1990 and 2012 and by 8.6% between 2002 and 2012 (CEPI, 2013). Future trends for specific energy consumption in the pulp and paper industry are expected to show a continued decrease of between 0.5% and 1.0% each year until 2050 (DG ENER, 2013).
18 3	Section 4.2 pg. 66	.Table 22: Overview of reference energy consumption values in Ecolabel and Nordic Swan certification schemes and energy consumption benchmark values included in ETS and BAT REF report	ADMP is not listed on abbreviation list at the end of the draft document	Accepted

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
18 4	Section 4.2 pg. 66-67	Table 22:Overview of reference energy consumption values in Ecolabel and Nordic Swan certification schemes and energy consumption benchmark values included in ETS and BAT REF report	Proposed energy reference values for electricity and fuel. Tissue Paper Grade Fuel 1,800 kWh/ADT Electricity 1,030 kWh/ADTTAD technology is a unique process where the fibres are formed on a 3-dimensional fabric structure and then dried with high volumes of hot air. Unlike a conventional Yankee process there is no pressing or creping of the sheet and tissue sheet is formed through evaporative drying. Owing to the unique nature of the TAD process separate heat and electricity reference values for the TAD grade are required. Add additional energy reference values: TAD Paper Grade Fuel 3,000 kWh/ADTElectricity 1,600 kWh/ADT	
18 5	Section 4.2 pg. 66-67	Table 22:Overview of reference energy consumption values in Ecolabel and Nordic Swan certification schemes and energy consumption benchmark values included in ETS and BAT REF report	Proposed Energy reference values Energy consumption for tissue is generally higher than GP/NP. Tissue never had reference values for fuel consumption. 1700kWh/ADT is too low for tissue fuel consumption. Even BREF indicates a range between 1800-2100 kWh/ton and it was highlighted in BREF that this range is incomplete. Energy consumption for tissue reference values for fuel consumption. 2100kWh/ADT	
18 6	Section 4.2 I.A.4 pg. 69	In view of the level of integration for GWP and TMP the question could be raised if there is a need to define energy consumption reference value for market pulp from non-integrated sites.	No, this is not needed. There are only few cases of market GWP and TMP and those particular cases should be solved case by case. No change to actual criterion	Rejected: Following stakeholder's consultations, only CTMP mills typically operate in a non-integrated manner but there is a need to establish reference values for market mechanical pulp for situations where minor amounts of mechanical pulp are added as furnish.
18 7	Section 4.2 I.A.3 pg. 70	Table 24:Energy consumption different RCF paper grades	Available paper for recycling grades for graphic and tissue production are on a downwards quality trend. This requires more cleaning and refining steps increasing the energy (electricity) consumption. This increasing trend is not considered.	Accepted
18 8	Section 4.2 I.A.4 pg.71	The same reference values shall be used for tissue paper products that are manufactured using non-woven or TAD technology.	TAD is a different technology producing products with different performances and application. A specific energy consumption reference value should be to add a specific reference value for energy consumption for TAD process	

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
189	Section I.A.4. pg. 72	Consumption = Internally produced fuel +0,8 x bleed steam (a) + 0,8 x steam from electrode boilers(b) + purchased fuel – sold fuel – 1,25 × internally produced electricity(c)– sold heat(d)	The term "0,8 x bleed steam" should be deleted because there is no rationale behind it. It was discussed at last revision and nobody knew where it came from. For some reason it was left as it is.	Rejected: The current formula allows for any sold heat to be converted into an equivalent fuel by dividing by 0.8 (i.e. assuming an 80% efficient boiler). The criteria also make allowance for fuel used to generate electricity to be subtracted from the fuel balance and added to the electricity account. The majority of stakeholders expressed the preference for not changing the equation.
190	Section 4.2 I.A.4 pg.73	Shall energy calculation methodology be re-design including modified factor, which should be based on the actual thermal and electric efficiencies of heat producing equipment	The method of calculating the consumption of energy should be unchanged	Accepted
191	Section 4.2 I.A.4 pg. 73	Given the above issues, it is to be discussed with stakeholders if the electricity consumption calculation should be kept at the simplified level, or should considered through more detailed energy balance calculation.	This criterion should be maintained because it limits the energy consumption (renewable and not renewable energy) and encourage the production of electricity. This criterion is relevant regarding the keys environmental impacts shown in the technical report and the importance of the energy recovery.	Accepted

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
19 2	Section 4.2 II pg. 73	Given the above issues, it is to be discussed with stakeholders if the electricity consumption calculation should be kept at the simplified level, or should considered thorough more detailed energy balance calculation.	We urge the need to keep the criteria simple to apply and to verify. We also stress the need to work for a fine tuning of the criteria without major changes No change to actual criterion	Partially accepted: The reference values have been updated according to the information provided by license holders and contained in BREF.
19 3	Section 4.2 II pg. 73	Given the above issues, it is to be discussed with stakeholders if the electricity consumption calculation should be kept at the simplified level, or should considered thorough more detailed energy balance calculation.	We urge the need to keep the criteria simple to apply and to verify. We also stress the need to work for a fine tuning of the criteria without major changes No change to actual criterion	See above
19 5	Section 4.2 II pg. 73	. Shall energy calculation methodology be re-design including modified factor, which should be based on the actual thermal and electric efficiencies of heat producing equipment.	No. We urge the need to keep the criteria simple to apply and to verify. We also stress the need to work for a fine tuning of the criteria without major changes No change to actual criterion	See above

No.	Reference: - section/task -page	Subject of the comment	Comment	Response
19 4	Section 4.2 II pg. 73	Q: The question may be put forward whether waste water treatment (and air/flue gases) should not be included in the calculation of electricity consumption.	For environmental reasons, it should be excluded, but in many cases at company level it is difficult to separate it. We suggest to allow to exclude them if the company is able to do it. No change to actual criterion	Accepted
19 6	Section 4.2 I.A.4 pg. 73	Q: The question may be put forward whether waste water treatment (and air/flue gases) should not be included in the calculation of electricity consumption.	No, waste water treatment should not be included because mills are not comparable on this point. Some mills use external treatment, some do full internal waste water treatment and some mills have both.	Accepted
19 7	Section 4.2. I.I. pg. 73	Given the above issues, it is to be discussed with stakeholders if the electricity consumption calculation should be kept at the simplified level, or should considered thorough more detailed energy balance calculation.	We prefer to leave it as it is. We can't see the benefits of making the calculations more complex. The risk is that the applicants and CBs can't handle the complex calculations. It is quite complex as it is already.	Accepted
19 8	Section 4.2. I.I. pg. 73	The question may be put forward whether waste water treatment (and air/flue gases) should not be included in the calculation of electricity consumption.	Water treatment shall be included in the calculations. When you compare reference values with Nordic Ecolabel then keep in mind that in Nordic Ecolabel the energy consumption of the waste water treatment is included in the calculations	Rejected: The level of integration of waste water treatment plants varies between mills. Some mills use external treatment, some do full internal waste water treatment and some mills have both.



N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
19 9	Section 4.2. I.I. pg. 73	Shall energy calculation methodology be re-design including modified factor, which should be based on the actual thermal and electric efficiencies of heat producing equipment	In the current criterion the applicant shall report all purchased fuels to process, and the fuel consumption is calculated as, used fuels minus the part of the purchased fuel that is used for internal electricity generation. This is because the electricity use should not be calculated twice. The electricity consumption is determined by reading the electricity meters. We don't quite understand where the efficiencies of heat producing equipment fits in here? We think that the discussion point should be the factor 1,25 that is used to transform the internally generated electricity to fuel. 1,25 corresponds to an efficiency of 80%. Perhaps the efficiency should be considered to be lower and then the applicant could deduct more fuels in the equation. This was also discussed when Nordic Ecolabel revised the same criterion but we couldn't see the benefits of changing the factor. We prefer that you leave the equation as it is. It works.	Accepted
20 0	Section 4.2 pg.73	Q: The question may be put forward whether waste water treatment (and air/flue gases) should not be included in the calculation of electricity consumption.	If waste water treatment electricity consumption is included in the scope, the criterion should be split in two parts: with and without waste water treatment. The feedback from the industrialists has shown that the energy consumption of waste water plan is very low.	Clarification: The level of integration of waste water treatment plants varies between mills. Following stakeholders' feedback, and also considering the need to simplify the requirements, the energy consumption for waste water treatment plant will not be specifically included.
<b>Comments relating to Criterion 3: Fibres</b>				
20 1	Section 4.3 pg.74	3.3Criterion 3:Fibres	Virgin fibre production and recycling have to be considered as part of the same cycle and not as competing materials. One cannot exist without the other, and vice versa. There is an industrial symbiosis between virgin and recycled fibres and therefore any tentative to compare the two production, which both can be carried on in a sustainable way, is misleading. Many LCA studies have proven that the impact of sustainable virgin fibre production is similar to recycled fibre production. Furthermore some countries do not allow any recycled fibres in tissue products like napkins. Many virgin only fibre mills would have difficulty sourcing and using recycled fibre. There is limited availability of market recycled fibre and installing a recycling plant is capital intensive. The symbiosis between virgin and recycled fibre and the need of continuous input of virgin fibres must be described.	Accepted
20 2	Section 4.3 pg.74	Criterion 3:Fibres – conserving resources, sustainable forest management	"To align with the footwear and furniture criteria, fibres from GMO sources should be banned. For the common area and when it will be relevant the formulation of the requirement should be aligned with the footwear and furniture criteria. The threshold could be increased but the threshold should be achievable for manufacturers and should present an environmental improvement. The requirement could concern both fibres from SFM or recovered fibres or a mix. It could also be interesting to study the inclusion of local products. In an environmental point of view it could be better to use local fibres. These cases have to be defined.	Accepted in principle. We agree to making no distinction between sustainable certified virgin fibre and recovered fibres for Copying and Graphic Paper. However, for Newsprint Paper, due to the current market practice and trends that are apparent from industry statistics, it is clear that a minimum mandatory recovered fibre content could be justified for that product group.

No.	Reference: - section/task -page	Subject of the comment	Comment	Response
20 3	Section 4.3 pg.74	Recycled content	There is no scientific evidence for significant environmental benefice adopting a minimum recycled content in this product group. Moreover, it could lead to geographical distortions between European countries, because of differential (high grades) recovered fibres availability. Furthermore, the leading principle for Tissue paper products is nowadays the market requirements for recycled or virgin fibres products. There is no change possible in a foreseeable future.	Accepted. We have generally aligned with the wording that was voted for furniture and footwear in 2016 but have also kept certain parts that were specific to paper products, such as reference to mill broke and EN 643.
20 4	Section 4.3 pg. 74	Recycled content	There is no scientific evidence for significant environmental benefice adopting a minimum recycled content in this product group. Moreover, it could lead to geographical distortions between European countries, because of differential (high grades) recovered fibres availability. Furthermore, the leading principle for Tissue paper products is nowadays the market requirements for recycled or virgin fibres products. There is no change possible in a foreseeable future.	Partially accepted. It cannot be doubted that paper made from recovered fibres has a lower environmental impact than paper made from virgin fibres. But at the industry level, it is unlikely than minimum recovered fibre contents would promote additional recycling of paper. It is agreed that mandatory minimum recovered fibre contents would essentially create geographical distortions in ease of compliance.

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
20 5	4.3 Criterion 3: Fibres – conserving resources, sustainable forest management Pg.74	Recycled content	<p>The EEB and BEUC strongly recommend setting a minimum recycled/recovered content to save on cutting forests, biodiversity loss and problems associated with land use changes and to achieve lower environmental impacts in other areas such as energy and water. A study published by UBA in 2012 shows that recycled paper deliver bigger savings on energy use (up to 60 per cent) and water (up to 70 per cent) when compared to primary fibre papers. According to the study recycled paper also produces less waste and emissions. Maximising recycled fibre content versus manufacturing paper solely from virgin fibre trees is the approach supported by the Environmental Paper Network in its Global Paper Vision. This network is made of a very broad range of European or international non-profit organisations, which shows a strong demand from civil society for a minimum recycled content. The EEB and BEUC are highly in favour of maintaining the usual wording referring to certification schemes for sustainable forest management FSC, PEFC or equivalent and do not support the new approach presented in the report based on the definition of principles for sustainable forest management (i.e. based on Forest Europe).The new approach suggested by the JRC for discussion is very unclear and has a high risk of undermining the scheme both in terms of ambition level and assessment/verification. The principles of Forest Europe are not really performance criteria, but just a listing of items to monitor the status and report on at the national level, not at the unit of the forest. For example, Forest Europe have a principle under which countries report the development of their forest area but there is no requirements or thresholds about whether it should be increasing, if it can decrease or should be maintained etc. The principles of Forest Europe are not fit for purpose to ensure the traceability through chain of custody and third party verification. It raises many questions and uncertainties and possibly will lead to a very different approach for assessing and verifying the sustainable origin of the wood: - Would the EU Ecolabel accept alternative systems that are not based on complete sets of standards for forest management and which are not developed with stakeholders' involvement? Systems for which accreditation and third-party verification are no longer necessary? - Would evidence that the applicant have bilateral agreements with forest managers about sustainable forest management be sufficient? How to ensure that these agreements will be at least as complete as FSC or PEFC? How will traceability be ensured? Would second-party verification about separation at the sawmill level and possible further levels in between be accepted? How will Competent Bodies control the evidence of such bilateral agreements? How will the Commission and the EUEB guarantee that ALL Competent Bodies in the EU apply the same level of ambition and rigour when accepting and checking such systems? This new approach has never been discussed in the EU Ecolabelling Board and could lead to the acceptance by the EU Ecolabel of wood from less reliable and sustainable sources. It can undermine an ambitious, equal and solid assessment and verification process across all EU countries and be in addition more burdensome for EU Ecolabel Competent Bodies. The EEB and BEUC consider that the EUEB has limited capacities to undertake an assessment of principles for sustainability of managed forests, which has much broader implications for other forestry related EU and national policies. It will be very time consuming contrary to the general aim of making the criteria development faster and more efficient.</p>	<p>The comments on recycled fibres are accepted at the level of a single production site but rejected at the level of the entire European industry.</p> <p>The comments criticising any potential insertion of basic sustainable forest management criteria directly in EU Ecolabel criteria are completely accepted.</p>

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
20 6	TR 4.3 Criterion 3, p.74- 75FIBRES/Certified fibres	Recycled content	Certified fibres We support the CEPI position and propose to maintain the minimum threshold of 50%.Actually, to go uniformly to 70% could be a wishful thinking, because of a triple burden: 1. Total availability of certified pulps, which are today required not only for paper production but also for other purposes (building, furniture...).2. This available certified pulp must also comply defined criteria (emissions, energy, substances).3. The recipe of pulp-mix has to match the 1st criterion requirements. These conditions could already drastically reduce the availability of raw material which comply the full set of requirements. The lack of certified pulp complying all criteria could also lead to drastic price increase, which will not be acceptable for a commodity market as Tissue paper products. The availability of such certified pulp complying all criteria could also be problematic for small and medium-sized enterprises which are not in position to negotiate sufficient volumes	Rejected. The EU Ecolabel has distinguished itself from labels such as FSC and PEFC precisely because of this "multiple burden". This way, the myriad environmental impacts associated with a particular product can be addressed with relevant criteria. We have considered to nuance the ambition level for sustainable certified fibres and/or recovered fibres in exceptional cases for integrated mills – but the overall idea still has to be to increase the demand for sustainable certified fibres and/or recovered fibres within the European paper industry.
20 7	TR 4.3 Criterion 3, p.74- 75FIBRES/Certified fibres		In addition, we strongly support that no distinction should be made between virgin fibres from sustainably managed forests, fibres recovered from pre-consumer waste and fibres recovered from post-consumer waste and we ask to have a direct link to the EN 643 standard.	Accepted. This is the current approach proposed for Copying and Graphic Paper.
20 8	TR 4.3 Criterion 3, p.74- 75FIBRES/Recycled Fibres		Use of broke There is a permanent uncertainty in considering the use of broke. The current wording is unclear (see Commission Decision of 9 July 2009, Tissue paper, p. 197/89: Recycled fibre is defined as fibre obtained through recycling of used paper and board from the printing or consumer stages. Purchased and own broke from virgin fibre production is not included in the definition.) What is considered as “production”? Does this definition include broke from converting? If we agree that broke “from virgin fibre production” (understood as broke from the paper machine) has not to be included in the definition of Recycled fibre, there is no clear interpretation about the fate of broke (or “waste”) from converting sites (integrated or not). To avoid any discrimination between integrated and non-integrated premises, we strongly recommend to rate any broke (or “waste”) from converting among pre-consumer recycled fibres (referring to EN 643 standard).	Accepted in principle but further discussion needed to reach any agreements on this matter. A written question has been inserted in TR 2.0 and the point will be raised when discussing fibre criteria at the 2nd AHWG meeting.
20 9	Section 4.3 pg. 74	Percentage of fibres	Feedback from our license holders shows that the certified fibre, which is a limited resource, is subject to strong competition (furnishings, construction, heating). Complementary resources need to be imported (impact of transport). We therefore recommend to keep 50 % of certified fibres as a minimum requirement (FSC/PEFC fibres).	Partially accepted. The ambition level for certified fibre is increased to 70% but a potential lower level may apply to integrated mills where there is a distinct lack of certified material in the surrounding region for reasons that are out of the paper producer's control.

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
210	Section 4.3 pg. 74	Recyclability	<p>Ecofolio would like to introduce the criteria “recyclability” for copying, graphic and newsprint paper. “Recyclability” is one of the criteria for the EU Ecolabel for printed paper. <u>Dyes:</u> Some mass-dyed paper could hinder the recycling process in graphic paper. In fact, copying, graphic paper products and newsprint are recyclable. Recovered graphic paper is primarily recycled within the graphic loop, i.e. it is supplied to the paper industry producing recycled graphic products (from newspapers to printing and writing paper). It is thus important to promote compatibility of graphic products with the recycling constraints of the graphic loop. The particularity of the graphic loop is related to one of the main characteristics of paper required for a paper-maker in terms of graphic paper, which is the level of whiteness. It is recommended to choose colorants whose sensitivity to the standard bleaching agents (e.g. hydrogen peroxide and sodium hydrosulphite) used in de-inking facilities has been confirmed. A French Standard is being defined (NF T12-040 - Paper and board — Paper for recycling — Decolouration methods) and will be available by the end of October 2016. A request to develop a new standard will be sent by the French Standard Agency (AFNOR) to the ISO in August 2016. <u>Wet strength agents:</u> In coherence with the criteria for the EU Ecolabel for printed paper, a criteria on the wet strength agents should be included for copying, graphic and newsprint paper. “<i>Wet strength agents may be used only if the recyclability of the finished product can be proved (...) Assessment and verification: the applicant shall provide the test result of the recyclability for wet strength agents and removability for adhesives. The reference test methods are PTS method PTS-RH 021/97 (for wet strength agents), (...)</i>”</p>	<p>Rejected for newsprint paper since it is not relevant. Even though this is an interesting point, it has to be borne in mind that the point at which the EU Ecolabel is awarded is at the mill. What will affect recyclability of newsprint is to do with the type and quantity of ink used (which does not seem to be an issue) and the use of staples or inserts (like free gifts in magazines and so on) which are beyond the control of the EU Ecolabel license holder.</p> <p>For copying and graphic paper, further details about the NF T12-040 standard would be needed and further discussion to see if this would be possible. Of course with copying and graphic paper the biggest single effects on recyclability are related to how heavily printed the paper is and with what other materials it is mixed prior to be collected and sorted for recycling.</p> <p>Are wet strength agents commonly used in the manufacture of newsprint paper and copying and graphic paper – if so which ones?</p>
211	Section 4.3 pg. 75	<p>No concrete wording at this stage although the intended ambition level would be harmonised across all three product groups and refer to a minimum sustainable fibre content of 70% - with sustainable fibres being considered as virgin fibres sourced from sustainably managed forests or fibres from recovered paper.</p>	<p>Support for the text on page 79. Any product that currently carries a Chain of Custody Logo (Coca), has already met the criteria. We ask to include a sentence saying that if the product carries an FSC or PEFC label as well, it can be considered automatically to comply with the EU Ecolabel criteria.</p>	<p>Accepted in principle, but for Newsprint Paper, it will depend on final agreements on the minimum recovered fibre content.</p>

No.	Reference: - section/task -page	Subject of the comment	Comment	Response
21 2	Section 4.3 pg.75	<p>“No concrete wording at this stage although the intended ambition level would be harmonised across all three product groups and refer to a minimum sustainable fibre content of 70% - with sustainable fibres being considered as virgin fibres sourced from sustainably managed forests or fibres from recovered paper”.</p>	<p>The demand of FSC-PEFC certified paper and EU- Ecolabel paper from customers of Holmen Paper have increased. Therefor the Mills of Holmen Paper have increased the purchase of FSC-and PEFC certified wood. Holmen Paper purchase wood locally from Sweden. If the demand of certified fibres is increased from 50-70 % in EU- ecolabel paper there will be a shortage of certified wood. We therefore propose to maintain the minimum threshold of 50%. “...minimum sustainable fibre content of 50% - with sustainable fibres being considered as virgin fibres sourced from sustainably managed forests or fibres from recovered paper”.</p>	<p>Rejected. The basic idea of the criterion is to increase the demand for SFM certified virgin fibre (and recovered fibres) so that eventually the market will respond with increased forest certification.</p>

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
21 3	Section 4.3 pg.75	No concrete wording at this stage although the intended ambition level would be harmonised across all three product groups and refer to a minimum sustainable fibre content of 70% - with sustainable fibres being considered as virgin fibres sourced from sustainably managed forests or fibres from recovered paper.	Minimum 70% certified fibre The world's total certified forest area as of May 2015 was about 439 million hectares, which is 10.9% of the total global forest area (UNECE). The requested increase of minimum certified fibre along the Ecolabel revisions (For Copy & Graphic Paper was set in 2002 > 10%, 2011 > 50% and now asking > 70% ) is not align with current % of certified forest in Europe = 17% (including CIS countries and according with UN Forest Product Annual Market 2014-2015) nor with the annual growth rates. The availability of certified wood is slowing. Certified forest areas grew globally at an average annual rate of 6% from 2008 to 2013. Since then the growth of certified forest areas is slowing, particularly in Europe where it is slowing to a rate below 1% per year. The majority of forests in Europe have private ownership which presents a challenge in terms of increasing certified forests at a faster rate. Owners are often reluctant to be told how to manage their land and/or to increase costs by agreeing to annual audits and other administrative fees. It should also be noted that a large part of the increase is due to the double-certification FSC and PEFC rather than the certification of new areas. There is a disparity between European countries regarding the availability of certified wood. The percentage of certified forests is close to 10% in Iberia and as high as 90% in Finland. Moreover, the vast majority of market pulps originating from eucalyptus plantations in South America are PEFC and/or FSC certified. So increasing the level of certified fibres would favor the importation of pulp and paper and disadvantage integrated mills located in Europe which must source their wood locally. Being this the criteria that drives the volume of paper to be sold with Ecolabel, the market awareness of the EU Ecolabel will decrease since there will be less volume sold on the market. By increasing the minimum threshold of certified fibres from 50% to 70%, the available volume of EU Ecolabel paper will decrease by 40% as more certified fibres will need to be used per tonne of paper manufactured.70% is also the threshold of certified fibres required for the PEFC and FSC certifications. There is a risk that paper producers will not continue to invest in or promote the EU Ecolabel but will focus on PEFC and FSC which are both brands with significantly higher market awareness than the EU Ecolabel.	Partially accepted. The unique situation of Portugal is recognised but cannot be applied to the entire European or Global sector. The original 10% certified fibre level back in 2002 was extremely low and the growth in forest certification since then has been substantial.  While a general increase in ambition level to 70% is maintained, a lower increase (to 55%) is proposed that can be applied in certain exceptional cases and only to integrated mills.
21 4	Section 4.3 pg. 76		One but last line sentence below: Please correct: the FSC 100% logo can be used only for products which are produced with 100% fibres from FSC forests. Recycled material cannot be used for the FSC 100% label. So delete there: "or recycled material".	Accepted. Not sure if the graph will remain in the TR but the reference will be corrected accordingly.
21 5	Section 4.3 pg. 80	SFM criteria	There seem to be consensus on how to count the percentage of certified fibre in the paper: certified fibres can't be used twice. But how to assure that all the applicants and CBs make the calculations same way? Finland would like to see clear instructions at least in the User Manual on how the percentage of certified fibres has to be counted in different situations, but preferably in the criteria document. And what are the documents needed for a paper mill to show that they buy enough certified fibres to be able to produce EU Ecolabelled paper?	Accepted. It would not be possible to mention this in great detail in the criterion text but should be discussed amongst stakeholders and detailed in the User Manual.

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
21 6	Section 4.3 pg. 79-80		a. Support for moving to 70% requirement (certified and/or recycled) + rest controlled wood/resources. As the report and the “Draft Preliminary Report” show, there is more and more certified material on the market, UNECE/FAO estimates that almost 30% of all industrial wood comes from certified forests, and the CEPI 2013 (pages 39-40) and ICFPA 2015 sustainability reports show high percentages of use of certified materials in this sector. The 70% from “certified and recycled sources” is not entirely comparable with the 50% virgin fibre. And FSC, by removing the difference between pre- and post-consumer reclaimed paper, offers now the possibility to complement certified virgin materials also with pre-consumer reclaimed fibres in the 70% component (in the past pre-consumer material had to go in the 30% remaining component).	Accepted.
21 7	Section 4.3 pg. 80		a. We do NOT support to introduce the choice between the “applicant” and the “material supplier” to be the one proving compliance through a Coca certificate. If the applicant is Coca certified, he has to control himself the validity of the claims coming with the materials he buys, and to comply with practices in the factory to ensure that the claims on the final products are reliable. He will be controlled for this purpose by Certification Bodies who are accredited. The Ecolabel Competent Authority will therefore have to do considerably less work compared with the situation where the applicant is NOT certified and where this applicant comes with claims from this supplier(s). In case the applicant himself is not certified, he is not necessarily trained and certainly not controlled whether he properly checks the claims from the supplier(s). In that case the Competent Authority will feel forced to do more elaborated checking on the validity and relevance of the supplier claims. And certainly in the paper sector this is not necessary. The CEPI and ICFTA reports show that chain-of-custody certification is quite normal amongst the paper products. producers nowadays (CEPI 2013: “93,2% of total paper tissue and board production capacity is chain of custody certified”).	Accepted. Reference to the term "material supplier" has been removed.



N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
21 8	Section 4.3 pg. 80		<p>. As regards the issue of “FSC, PEFC or equivalent schemes”. In our view PEFC is not equivalent to FSC, and that position is reflected by some bodies in Europe (TPAC in the Netherlands which still does not accept PEFC Malaysia as compliant, the Blaue Engel criteria for Printing and Publication Paper and for Furniture prefer FSC). So de facto equivalent means here: as a minimum: equivalent to PEFC. But Ecolabel Competent Bodies may not be able to really assess other schemes as equivalent, or may risk to come to different conclusions which are not justified by different situations. One option is just to focus on FSC and PEFC and to decide, when the issue occurs, in the EUEB whether a new scheme can be introduced when criteria are reviewed. We are not against the EU assessing forest certification schemes, be it that it should not only look at its criteria and indicators but also how it ensures compliance, its transparency and complaints mechanisms. We are also not against the EU developing an agreed definition of SFM which can be applied to the individual forest management unit level, with indicators that are performance based. That is not impossible, but it will require a big investment in expertise, multi-stakeholder engagement etc. Such a definition should have indicators that are also further specified at the national and/or forest type level (FSC and PEFC have not only global requirements but these are reflected in national standards that have been developed in national stakeholder processes and that have national variations). That should lead to a very different set of indicators than the Forest Europe criteria reflected in Table 27 on page 81-82 of your report. Because those Forest Europe indicators are formulated to measure performance at the country level, but do not give direction to individual forest managers. And besides the multi-stakeholder process, with appropriate scientific input, there is the issue of the political acceptability in the EU of the outcome. The Lisbon Treaty lacks a chapter on forests and the discussions on the EU Forest Strategy and EU sustainable biomass criteria a couple of years ago show that several countries prefer to stick at the general level of the Forest Europe indicators.</p>	<p>Partially accepted. The current interpretation of the wording "FSC, PEFC or equivalent", is basically what you describe: i.e. FSC is accepted, PEFC is accepted, any equivalent scheme must first be discussed at the EUEB and a consensus reached about whether or not it is suitably equivalent. About the direct mention of SFM indicators in EU Ecolabel criteria, it appears that this will not be necessary in the end and so the comments are now moot – but the feedback is welcomed.</p>
21 9	Section 4.3 pg.80	Besides SFM certificates, what other forms of assessment and verification could be considered as proof of compliance that fibres are sustainably sourced?	The existing forest certification schemes as FSC, PEFC and EUTR tools fully meet this function. There is no need to implement additional control methods.	Accepted.
22 0	Section 4.3 pg. 80	What are the most important SFM criteria, how credible are they and how easily can they be verified?	The criterion define during the Helsinki 1993 interministerial conference should be a good basis as proof of compliance that fibres are sustainably source. As suggested by the UK, the EC or the EUEB could define what the equivalent of FSC, PEFC...are	Accepted.

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
22 1	Section 4.3 pg.80	Q. What are the most important SFM criteria, how credible are they and how easily can they be verified?	All SFM criteria are equally important (as recommended by the FSC and PEFC schemes). They can only be verified by forestry experts.	Accepted.
22 2	Section 4.3 pg.80	Q. What are the pros and cons of using existing SFM certification schemes as proof of compliance with SFM criteria established under the EU Ecolabel?	Existing SFM schemes (FSC, PEFC) are already widely implemented within the paper industry. It required a huge investment in process modification, training of personnel and costs. There are no cons.	Accepted.
22 3	Section 4.3 pg.80	. Besides SFM certificates, what other forms of assessment and verification could be considered as proof of compliance that fibres are sustainably sourced?	Any other type of assessment would not be manageable by the industry or the competent bodies. Forestry expertise and forest audits would be required. It would be also very costly.	Thank you for the clarification
22 4	Section 4.3 Criterion 3 pg. 74-82	SFM criteria	Finland doesn't support the idea of moving towards a wording that is free of direct references to FSC and PEFC and directly embedding certain sustainable forestry management principles in the criterion text. It would become extremely difficult for the CBs to judge whether the sustainable forestry management requirement is filled up or not and we should use existing SFM certification schemes as proof of compliance with SFM criteria.	Accepted.
22 5	Section 4.3 Criterion 3 pg. 74-82	Fibres	Ecofolio supports the minimum 70% requirement for certified from sustainable managed forest and/ or recycled fibres, for all three products groups, and the remaining from legally sourced material. The compliance with the certification schemes PEFC and FSC should be explicitly mentioned. "And equivalent" should also be explained, particularly the criteria to fulfil and the supporting documentation.	Accepted.

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
22 6	Section 4.3 Criterion 3 pg. 74-82	Third party verification	Equivalent to FSC or PEFC shall be defined and the decision process shall also be agreed upon. . Denmark suggests that a possible recognition of other schemes in the EU Ecolabel, shall at least be done on EUEB level, after a technical discussion in CB forum. Denmark can support the requirement for 70% certified or recycled fibre –and a Coca-certificate for the remaining 30% to ensure traceability and legal sourcing. And it shall be clear that a mix of certified and recycled fibre is also permitted. For certain tissue products we would like JRC to investigate if an incentive to use recycled fibre could be introduced, e.g. a different limit value for energy or emissions. The argument being that for some tissue products the fibre is lost and therefore higher use of recycled fibre makes sense.	Accepted. What can be considered as acceptable as equivalent to FSC and PEFC could perhaps simply follow the text that was prepared for the User Manual for converted paper.
22 7	Technical Report 1.0 for the revision of EU Ecolabel criteria for paper products, pages 74-82	SFM criteria	We support a minimum content of 70% certified or recycled fibres considering that 100% might be too demanding in regard to existing FSC/PEFC systems.	Accepted
22 8	Section 4.3 Criterion 3 pg. 74-82	SFM criteria	There should be a further discussion on how to avoid double counting of certified fibres. For a uniform approach we need clear instructions (at least in the User Manual) on how the percentage of certified fibres has to be counted.	Accepted. The issue of acceptable balance sheet reporting shall be discussed at the 2nd AHWG meeting.
22 9	Entire Section 4.3 pg.74	Fibre certification	Increasing the level of certified fibres would favour the importation of pulp and paper and disadvantage integrated mills located in Europe which must source their wood locally. For integrated mills, it does not make environmental or economic sense to increasing the wood procurement distance in order to get additional FSC or PEFC wood (although the burden of transportation is not taken into account in the EU Ecolabel criteria).	Partially accepted. The aim of increasing the ambition level is to also increase the extent of forest certification in Europe. However, we try to recognise that some integrated mills might not be able to meet this increased requirement – in those cases a lower ambition level of 55% may apply.

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
23 0	Section 4.3 Criterion 3 pg. 74-82	3.3Criterion 3:Fibres – conserving resources, sustainable forest management	<p>We agree with the proposed definition of sustainable fibres, “being considered as virgin fibres sourced from sustainably managed forests or fibres from recovered paper.” Fibres from recovered papers should clearly include pre-consumer and post-consumer paper for recycling but not include mills broke. We agree on no distinction between pre-consumer and post-consumer fibre and we ask to have a direct link to the EN 643 standard. However, the proposed ambition level to raise the minimum content of certified fibres or recycled fibres to 70% cannot be met at a level playing field for all EU Ecolabel paper manufacturers. It could also penalise integrated mills which have no other choice than to source the wood locally. It would not make environmental or economic sense to procure certified wood at long distances outside the natural wood procurement basin. We therefore propose to maintain the minimum threshold of 50%.To maintain the market awareness of the EU Ecolabel. By increasing the minimum threshold of certified fibres from 50% to 70%, the available volume of EU Ecolabel paper will decrease by 40% as more certified fibres will need to be used per tonne of paper manufactured. As a result, there will be less volume of papers with the EU Ecolabel brand placed on the market.70% is also the minimum labelling threshold of certified fibres required for the PEFC and FSC certifications. There is a risk that paper producers will not continue to invest in or promote the EU Ecolabel but will focus on PEFC and FSC which both are brands with significantly higher market awareness than the EU Ecolabel. The availability of certified wood is slowing. The increase of minimum certified fibre during the past Ecolabel revisions (for CGP 2002 &gt; 10%, 2011 &gt; 50% and now requesting &gt; 70%) is not aligned with the current percentage of certified forests in Europe (= 17% including CIS countries and according with UN Forest Product Annual Market 2014-2015) Certified forest areas grew globally at an average annual rate of 6% from 2008 to 2013. Since then the growth of certified forest areas is slowing, particularly in Europe where it is slowing to a rate below 1% per year. The majority of forests in Europe has private ownership which presents a challenge in terms of increasing certified forests at a faster rate; one of the reasons being the costs associated with the annual audits and other administrative fees. Furthermore the forestry criteria in both PEFC and FSC have been adjusted and sharpened several times since 2000 at each revision of the forest management standards and via the interpretations from the different certification bodies. Thus it is harder today to get and maintain a forest certified. It should also be noted that a large part of the increase is due to the double-certification FSC and PEFC rather than the certification of new areas. There is a disparity between European countries regarding the availability of certified wood. The percentage of certified forests varies from 10% to 90% in the different European countries. So increasing the level of certified fibres would favour the importation of pulp and paper and disadvantage integrated mills located in Europe which must source their wood locally. For integrated mills, it does not make environmental or economic sense to increasing the wood procurement distance in order to get additional FSC or PEFC wood (although the burden of transportation is not taken into account in the EU Ecolabel criteria).The EU Ecolabel is a multi-criteria certification covering the whole life cycle of a product. Not all the certified pulp is compliant with the EU Ecolabel criteria for the emissions to air and water, the criteria for energy use or the criteria on limiting and excluding substances and mixtures. In reality the amount of certified wood available for the EU Ecolabel is much lower than the reported figures of FSC and PEFC certified forests. The certified wood market in Europe is increasingly competitive. The quantities of certified wood announced by FSC and PEFC are not only available for the paper industry. The paper industry is a commodity sector competing for certified wood against other sectors manufacturing value-added wood products such as furniture, housing and construction materials or wood-pellets used for energy. The wood construction and the wood energy markets are developing strongly. Assessment</p>	<p>Accepted. We continue with the definition of sustainable fibres that you support – but with an open question of what to do with purchased mill broke.</p> <p>We have carried out further research to look at the levels of certified forests in different European countries and now offer a lower ambition level (55%) for integrated mills situated in countries with low extents of certified forests. However, we want to continue to send a positive signal to the market for the demand for certified fibres, so the ambition level of 70% is maintained except in the aforementioned exceptional cases.</p>

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
<b>Comments relating to Criterion 4: Excluded or limited substances and mixtures</b>				
23 1	Section 4.4 pg. 83	Criterion 4: Excluded or limited substances and mixtures	The chemical approach should be considered regarding the whole production process and not only the content of chemicals in the final product. The environmental impacts of chemicals during the production process have to be reduced even if these chemicals are not present in the final product. This comment applies for all the criterion 4.	Partially accepted: This is what is actually being done already. Criteria 4a) and 4b) focus on the final product (as per Article 6(6) and 6(7) of the EUEL Regulation) while criteria 4c-4h) or 4i focus on chemicals used during the production stage that may or may not remain in the final product.
23 2	Section 4.4 pg.83	Criterion 4: Excluded or limited substances and mixtures	Some substances (ink, glue...) are troublemakers for recycling. Thus they should be banned or limited. I am waiting for a document which list these substances. I will join it in the forum space in BATIS.	Accepted. Please share this report (was it NF T12-040 ) when you can so we can discuss further.
23 3	Section 4.4. pg. 83	Criterion 4: Excluded or limited substances and mixtures	In general, this criterion has not created problems in C&G paper applications	Accepted. Good to know!
23 4	Section 4.4. pg. 84	The applicant shall supply a list of all the chemical products used in the pulp and paper production process	We (CB) get normally the chemical list for the pulp production direct from the pulp producer and not from the applicant.	Accepted. Good to know – although first the applicant has to provide details of their pulp suppliers.
23 5	Section 4.4 Criteria 4a pg. 85	in concentrations higher than 0.10% (weight by weight) or other specific concentration limits as per Article 10 of Regulation (EC) No 1272/2008:	Many tissue products are made with Wet Strength Agents. These chemicals contain substances that are classified H410 at a level well above 0,01% in the finished products. This criteria would remove at least 50% of the current Ecolabel tissue products. Exclude Wet Strength Agents from this criterion	Consultation specifically on this issue is foreseen. Where justifiable, derogations can be made to allow for their use –but this must be agreed before the final criteria are voted.
23 6	Section 4.4 Criterion 4a) pg. 85	hazard statements	How have you defined the hazard statement list?	This is linked to the recommendations of the joint EU Ecolabel Chemicals Task Force, led by the JRC with members from different CBs, industry and NGOs who reported to the EUEB.
23 7	Section 4.4 Criterion 4a) pg. 85	hazard statements	The following hazard statement could also be added : H334 H314 H315	Rejected: H314: Causes severe skin burns and eye damage; H315: Causes skin irritation; H334: May cause allergy or asthma symptoms or breathing difficulties if inhaled H317 is already included, which is a more stringent restriction than H314 and 315. Any restriction for H334 only applies to product groups that are used in such a way that exposure scenarios could lead to the exacerbation of asthma symptoms. We have not received any evidence to suggest that this hazard could be an issue with paper products.

No.	Reference: - section/task -page	Subject of the comment	Comment	Response
23 8	Section 4.4 Criteria 4a pg. 85	Criterion 4a)	<p>The proposed criteria no longer contains the phrase “Substances or mixtures which change their properties upon processing (e.g., become no longer bioavailable, undergo chemical modification) so that the identified hazard no longer applies are exempted from the above requirement.” This will mean that all classified substances or mixtures contained in the final paper at higher than 0.1% (w/w) can no longer be used. This will completely remove many paper auxiliaries essential to paper making such as de-foamers, cleaners, sizing agents, wet strength agents, dyes. This cannot be justified either on a chemical or environmental level since the original substance is no longer present in the paper and there is no risk from potential hazardous effects. Moreover they are beneficial for the environment as they help to reduce energy consumption, resources and water in the paper making process. This was acknowledged by Nordic swan with derogations for cationic polymers and colorants in cases classification is due to the polymer or colorant itself. Restrictions on substances and mixtures should be based on risk rather than only on intrinsic properties of the substance/mixture. Setting the same 0.1% limit for substances and mixtures irrespective of which hazard group they belong to is not in line with common risk based assessments. An example where this approach would lead to consequences for the industry without any benefits for the environment is cationic polymers commonly used in paper industry as retention/fixing/dewatering/wet strength aids are classified as toxic to the environment due to their positive charge. These polymers are fixed to the fibres and the identified hazard no longer applies since it is no longer bioavailable and will not be released to the environment. These type of chemicals are essential to paper industry and saves raw materials, energy and other resources. It is illogical that paper shall have stricter limits than what is required for classification of chemical substances and mixtures.- EU Ecolabel deals with the environment. It would make sense to limit substances which have a potential impact on the environment. However, as the wording is now these substances should not be retained in the paper and the applicant has to prove that they will be released to the environment -- sounds counterproductive. - The wording is clearer and it makes it easier for the applicants and the industry to decide on compliance with the award criteria. - Paper making is an industrial process where REACH regulation, CLP and other legislation ensures, that hazardous substances are safely managed. We see no reason restricting substances with a classification based only on acute toxicity data, as safe management of such chemicals is already in place. Maintain the current exemption clause of the existing criteria.</p>	<p>Rejected: The removal of this exemption clause applies to all upcoming EU Ecolabel product group revisions. For chemicals that would otherwise be banned, if there is justification for their further use, for example due to the fact that there are no less hazardous alternatives on the market that achieve an equivalent function, or that the function imparted has considerable environmental benefits, then a derogation can be requested. It must also be understood that if the chemical does not remain in the paper in concentrations exceeding 0.1% by weight, it will not be excluded by the criteria 4a and 4b.</p>
23 9	Section 4.4 Criteria 4a pg. 85	Criterion 4a)	<p>The categorisation into three hazard groups makes no sense if the threshold is the same for all. This does not reflect the scientific basis for classification. Follow the criteria set by the CLP regulation.</p>	<p>Rejected: The distinction between groups was made following the recommendations of the 1ST EU Ecolabel Chemical Task Force. The main reason for the grouping is when considering derogations. It should be extremely difficult to justify a derogation for the presence of substances with group 1 hazards in EU Ecolabel paper and much easier to obtain derogations for substances with Group 3 hazards. Group2 would logically be somewhere in the middle. Because there are no derogations for paper yet – this will be why the grouping seems strange.</p>

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
24 0	Section 4.4 Criterion 4a pg.85	restriction of CLP classified substances and mixtures	A clear definition of what can be considered as the point at which a hazardous chemical has undergone changes so as to no longer be rendered hazardous is needed.	Accepted in principle. Some general guidelines can be provided but ultimately it has to be done on a case by case basis.
24 1	Section 4.4 Criterion 4a) pg. 85	Criterion 4a) Restriction of CLP classified substances and mixtures	<p>A: The proposed criteria no longer contains the phrase “Substances or mixtures which change their properties upon processing (e.g., become no longer bioavailable, undergo chemical modification) so that the identified hazard no longer applies are exempted from the above requirement.” This will mean that all classified substances or mixtures contained in the final paper at higher than 0.1% (w/w) can no longer be used. The proposed use limit would not allow the EU Ecolabel grade papers to be produced since 0,1 w-% of dosage is not simply enough for different functional chemicals, e.g. fixatives, sizing products, dyes, and strength additives. The use of these product types is necessary in the production – some are used only in certain EU Ecolabel paper types whereas some in all paper types. Tissue paper requires to have wet strength properties, typical dosages being above the proposed limit for use rate. Wet strength properties are achieved mainly by cationic resins (as glyoxal containing WSA’s not allowed for EU Ecolabelled tissue paper), which are all classified as Aquatic Chronic toxicity. Colorants are used widely in newsprint, c&amp;G and tissue paper production. To meet the wanted properties, like shade, the required use rate is high, even up to several percentages. Only in very limited applications, the proposed use limit would be sufficient. Fixatives control the concentration and size of hydrophobic particles in the wet-end, and thus improve the efficiency of the machine as they enable stronger attachment of various particles to the fibre surface. Fixatives are cationic polymers assigned with aquatic chronic toxicity classification. The typical use rate is much higher than the drafted limit would allow. Criteria would have effect on the use of sizing chemicals in copying&amp;graphic paper grades. The dosages used are above 0,1 w-%. Applied sizing chemicals would be in scope of the restriction due to the assigned sensitizing hazard classification. This cannot be justified either on a chemical or environmental level since the original substance is no longer present in the paper and there is no risk from potential hazardous effects. Moreover they are beneficial for the environment as they help to reduce energy consumption, resources and water in the paper making process. This was acknowledged by Nordic swan with derogations for cationic polymers and colorants in cases classification is due to the polymer or colorant itself. B: The categorisation into three hazard groups makes no sense if the threshold is the same for all. This does not reflect the scientific basis for classification.</p> <p>A: Maintain the current exemption clause of the existing criteria. B: Follow the criteria set by the CLP regulation.</p>	<p>Rejected: The removal of this exemption clause applies to all upcoming EU Ecolabel product group revisions.</p> <p>For chemicals that would otherwise be banned, if there is justification for their further use, for example due to the fact that there are no less hazardous alternatives on the market that achieve an equivalent function, or that the function imparted has considerable environmental benefits, then a derogation can be requested.</p> <p>It must also be understood that if the chemical does not remain in the paper in concentrations exceeding 0.1% by weight, it will not be excluded by the criteria 4a and 4b.</p>

No.	Reference: - section/task -page	Subject of the comment	Comment	Response
24 2	Section 4.4 Criterion 4a pg.85	The text in the existing criteria “Substances or mixtures which change their properties upon processing (e.g., become no longer bioavailable, undergo chemical modification) so that the identified hazard no longer applies are exempted from the above requirement” is missing in the proposed criteria	EU Ecolabel deals with the environment. It would make sense to limit substances which have a potential impact on the environment. - In paper making the products used to improve / alter paper properties, e.g. colour, strength, wet strength etc. are often classified for the environment but by design and application during the paper manufacture process they will be retained in the paper and therefore not be released to the environment –which in principle is what we all strive for. These products undergo chemical reactions in course of getting fixed in the paper and they will lose their hazardous properties when doing so also question the fact why substances based on acute tox data are regulated -- EU Ecolabel is for the environment and paper making is an industrial process where REACH regulation, CLP and other legislation ensures, that hazardous substances are safely managed. Substances or mixtures which change their properties upon processing (e.g., become no longer bioavailable, undergo chemical modification) so that the identified hazard no longer applies are exempted from the above requirement	As stated in responses above to similar comments – the removal of this general exemption clause is in line with the findings of the EU Ecolabel chemicals task force. It is a vague exemption that can be easily interpreted in many different ways. It is preferred that where there is doubt about the possibility of being able to use certain chemicals is raised, that a potential derogation is requested and the environmental benefits of the substance mentioned together with an assessment of if any less hazardous alternatives that achieve the same purpose are available. Please note that a derogation is only needed if the hazardous substance can be considered to be present in the final paper product at levels >0.1%.



N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
24 3	Section 4.4 Criterion 4a pg. 85	the applicant shall prove compliance with these criteria by providing data on the amount (kg/ADT paper produced) of substances or mixtures used in the process and by demonstrating that the substances or mixtures referred to in this criterion are not retained in the final product above the concentration limits specified. The concentrations of substances and mixtures shall be specified in the Safety Data Sheets in accordance with Article 31 of Regulation (EC) No 1907/2006.	MSDS is the standard way of communicating hazards, as defined by REACH. This also applies to suppliers from outside of EU. The raw materials used in paper are mostly mixtures of several substances. Suppliers don't generally disclose their full recipes ("substances") to paper manufacturers, except for hazards and indirectly through third party laboratory tests or compliance statements. The applicant shall prove compliance with this criterion by providing data on the raw materials used in the process and by demonstrating that the substances referred to in this criterion are not mentioned on the material safety data sheets among the classified substances. The applicant shall prove compliance with this criterion by providing data on the raw materials used in the process and by demonstrating that the substances referred to in this criterion are not mentioned on the material safety data sheets among the classified substances.	Accepted. This is the level of proof we are intending to require anyway. If a particular hazardous substance is present in a mixture above a certain concentration, the supplier of that mixture is obliged to mention that substance (or at least its classification) and its concentration in the SDS as per Article 31 of REACH.
24 4	Section 4.4 Criterion 4a pg. 85	Art. 6.6. of EU Ecolabel Regulation	EEB and BEUC welcome that this criterion is introduced also for tissue paper as it is part of the EU Ecolabel Regulation. Concerning the grouping of hazard statements, the EEB and BEUC are concerned that substances being PBT or vPvB will not be well covered so that they are avoided in the production phase. Such substances shall not be used according to article 6.6 in the EU Ecolabel Regulation which refers to article 57 of REACH. However, the PBT and vPvB criteria from REACH cannot be directly translated into hazard phrases. The JRC should consider a new proposal to better address this substances (perhaps to be discussed within the EU Ecolabel Task Force on Chemicals). A possibility could be to start excluding substances that have been evaluated in the EU to be PBT or vPvB in accordance with Annex XIII of REACH, as done by the Nordic Swan. The EEB and BEUC support the deletion of the clause "Substances or mixtures which change their properties upon process..." According to Competent Bodies, this wording has proved to be very difficult to interpret.	Accepted in principle. There should be no need to consider specific classifications for PBT because specific hazards for toxicity (the T in PBT) are already present. Any approach towards dealing with vPvB should be addressed by the Chemicals Task Force and not in the revision process of a single product group.
24 5	Section 4.4 Criterion 4a pg. 85	H361(R64	H361 (R64) is not in the list in the proposed criteria, why?	This was a simple unintentional omission and has now been corrected.

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
24 6	Section 4.4 Criterion 4a pg. 85	EUH029, EUH031, EUH032, EUH059 and EUH070?	How these statement have been defined?	They were present in the original criteria for both Newsprint Paper and Copying and Graphic Paper. It is proposed to discuss their relevance at the 2nd AHWG meeting because these are not generally included for other EU Ecolabel product groups. EUH029: Contact with water liberates toxic gas EUH031: Contact with acid liberates toxic gas EUH032: Contact with acids liberates very toxic gas EUH059: Hazardous to the ozone layer EUH070: Toxic by eye contact
24 7	Section 4.4 Criterion 4a pg. 85	restriction of hazardous substances and mixtures	The focus of the criteria on hazardous substances is on substances, which may remain in the final product. We should consider also the process chemicals, which do not remain in the final product.	Accepted. This is what is actually already being done with criteria 4c and onwards. It is only criteria 4a and 4b that are general and focussed on the final product.
24 8	Section 4.4 Criterion 4a pg. 85	restriction of hazardous substances and mixtures	The wording in the criteria document should specify a specific concentration limit for residual hazardous substances (0.10% w/w).	Accepted. This concentration limit is specified in the proposal for criteria 4a and 4b in TR 2.0.
24 9	Section 4.4 Criterion 4a pg. 85	restriction of hazardous substances and mixtures	Some kind of common database to administer the huge chemical data should be developed to ease CBs' work.	Rejected: Although this would be a welcome initiative, it is for DG ENV to decide how to proceed in this area since it would require significant resources to create and maintain such a database. The basis for information expected is to be the SDSs according to Article 31 of REACH.
25 0	Section 4.4 pg. 86	restriction of hazardous substances and mixtures	Especially for substances which are harmful to the environment it's not only relevant how much of such a chemical remains in the final product but how much ends up in waste water. Therefore limit values would be appreciated.	Accepted in principle although what emissions of hazardous substances to waste water would be proposed to be addressed exactly? Further discussion would be needed on this matter.
25 1	TR section 4a page 85 questions on page 87	Introduction of concentration limit of 0,1 %	The intentional use of cmr substances should not be allowed (group 1 hazardous) at all. Group 2 hazardous should be limited to 0.1 % weight content Chemicals that undergo changes during the process should be kept in the scope, EUH hazard statements should be kept in group 3.	Accepted in principle – this could be a starting point for further discussion on the topic of how to consider derogations (currently there are none).
25 2	Technical Report 1.0 for the revision of EU Ecolabel criteria for paper products, pages 86-87	Removal of the text exempting substances and mixtures which change their properties upon processing.....	We agree that a clear definition is necessary but suggest the necessity to have some sort of exemption phrase to allow for the use of cationics (dyes and chemicals) which often have ecotox classifications but are >98% substantive to the paper, once bound they will not be removed into the waste water. These are widely used in the industry (at relatively low addition levels) and there are no suitable alternatives.	Accepted in principle: this should be the starting point for discussions about a potential derogation for these types of chemicals.

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
25 3	Section 4.4 Criterion 4a pg. 87	Can a clear definition of what can be considered as the point at which a hazardous chemical has undergone changes so as to no longer be rendered hazardous be agreed upon for the paper production process? If such a clause is to be reintroduced into the criteria proposal, clarification will be necessary to ensure a transparent and consistent approach between different Competent Bodies	We are in favour to reintroduce such a clause so that not to lose much valuable difficult to replace raw materials (polymers, resins, dyes, adhesives), including such polymers that are necessary to retain the fibres or effective purification of waste water. We suggest to use the interpretation of this criteria included in the User Manual Guide for Rins-off Cosmetic, i.e.: "Chemicals that undergo a reaction can be considered exempt from this criterion. However, the reaction products shall be declared and are subject to the conditions of this criterion."	Rejected: this would potentially make the criteria even more difficult to comply with. It is easy to test for the same substance before and after a process but to identify any potential reaction products is going to be difficult and with no guarantee of success. Then to be able to know the hazardousness of those products is an even greater challenge. At least in Rinse Off Cosmetics, any possible reactions need to be understood well as it may affect product quality – but with paper, product quality is about physical parameters more than chemical ones.

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
25 4	Section 4.4. Criterion 4a pg. 87	Q. Can a clear definition of what can be considered as the point at which a hazardous chemical has undergone changes so as to no longer be rendered hazardous be agreed upon for the paper production process? If such a clause is to be reintroduced into the criteria proposal, clarification will be necessary to ensure a transparent and consistent approach between different Competent Bodies.	We have not needed to use this clause this far. However, we think that there may be cases for example, with the cationic polymers, where the classification is done due the cationicity, that the clause could be used. When the polymer reacts and loses its cationicity the reason for the classification is not there anymore.	Accepted in principle. This comment, together with others, should be used as part of discussions to decide if a derogation may be needed for cationic polymers
25 5	Section 4.4 Criterion 4a pg. 87	Should the restriction of SVHCs be extended to mixtures used during processing or only to those mixtures where SVHCs are likely to remain in the final product?	No, it shouldn't. The restriction of SVHCs should be extended to mixtures where SVHCs are likely to remain in the final product	Accepted in principle, although the initial screening for SVHCs should involve all process chemicals used.

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
25 6	Section 4.4 Criterion 4b pg.88	The applicant shall prove compliance with this criterion by providing data on the amount (kg/ADT paper produced) of substances used in the process and by demonstrating that the substances referred to in this criterion are not retained in the final product above the concentration limits specified. The concentration shall be specified in the safety data sheets in accordance with Article 31 of Regulation (EC) No 1907/2006.	The chemical suppliers are in no way not going to disclose their recipes to their customers. Even if it has been required by the previous criteria, that has never happened -- please verify that with any competent body. Realistic is to require 1) "a list of raw materials", 2) standard documents, such as the MSDS and 3) specific supplier statements. If you wish to detect concentrations lower than the threshold for mandatory reporting on the MSDS, then please specify what kind of a supplier declaration will be needed. Please be aware that it is very unprovable that any of the substances referred to by this criterion would be found in the paper chemicals. We have assessed around 700 chemicals and the SVHC or candidate list chemicals were not used or know to be present in any of them. I want to remind you that if a max cut-off value for hazard statement on an MSDS is 1%, then no products used less than 10% can even theoretically exceed the criteria without having the hazard sentence mentioned on the MSDS. Also requesting consumption quantities for all chemicals by default is a big inefficiency. We suggest that a calculation on total concentration would only be required if a SVHC or a candidate list chemical would be found. The applicant shall prove compliance with this criterion by providing a list on the raw materials used in the process and by demonstrating that the substances referred to in this criterion are not retained in the final product above the concentration limits specified.	Rejected. In order to arrive at the conclusion you propose, it will be necessary for the applicant to go through the following steps which we are asking. We do agree that only information at the level of REACH Article 31 compliant SDS should be required – it is unrealistic to ask for more. However, concentration limits that trigger then mention of a particular hazardous substance on the SDS vary depending on the nature of the hazard involved and can be as low as 0.10% or in some specific cases, even lower (see Article 10 of REACH). If the applicant wishes to claim that the hazardous substance is present below 0.10% in the paper product, they have to first know what are the approximate dosage rates of the chemical and any relevant dilutions prior to dosing
25 7	Criterion 4b) Restriction of substances of very high concernPg.88	Art. 6.6. of EU Ecolabel Regulation	The EEB and BEUC welcome that this criterion is introduced also for Tissue Paper in line with the EU Ecolabel Regulation. The EEB and BEUC strongly advice that the restriction of SVHCs be extended to substances and mixtures used during processing. The pulp and paper industry use a lot of chemicals in their processes and has a lot of knowledge about them. To exclude SVHC's already as process chemicals would be in line with the article 6.7 in the EU Ecolabel Regulation that stipulates that derogation should not be given for SVHCs in the Candidate List. There are laboratories testing for the presence of SVHCs in paper products as part of their regular services to customers.	Accepted in principle. All process chemicals should be screened for SVHCs but it is reminded that Article 6(7) only focuses on SVHCs remaining in the final product.

No.	Reference: - section/task -page	Subject of the comment	Comment	Response
25 8	Section 4.4 Criterion 4b pg. 88	Should ECF bleaching only be permitted in line with the use of certain technologies and/or chlorate monitoring? Or can this be considered to be already controlled to a satisfactory extent by AOX criteria?	We consider that it is already controlled to a satisfactory extent by AOX criteria	Accepted
25 9	Section 4.4. Criterion 4b pg. 88	The applicant shall prove compliance with this criterion by providing data on the amount (kg/ADT paper produced) of substances used in the process and by demonstrating that the substances referred to in this criterion are not retained in the final product above the concentration limits specified. The concentration shall be specified in the safety data sheets in accordance with Article 31 of Regulation (EC) No 1907/2006.	MSDS is the standard way of communicating hazards, as defined by REACH. This also applies to suppliers from outside of EU. The raw materials used in paper are mostly mixtures of several substances. Suppliers don't generally disclose their full recipes ("substances") to paper manufacturers, except for hazards and indirectly through third party laboratory tests or compliance statements. The applicant shall prove compliance with this criterion by providing data on the raw materials used in the process and by demonstrating that the substances referred to in this criterion are not mentioned on the material safety data sheets among the classified substances. Should it be needed, then the total concentration in the final product can be verified in a separate calculation.	

No.	Reference: - section/task -page	Subject of the comment	Comment	Response
260	Section 4.4. Criterion 4b pg. 88	Q. How exactly can it be "demonstrated" that a substance is not retained in the final product? Are there any examples of this with existing applications?	Actually, at first we check whether the chemical product is classified or not. If classified applicant will show with a calculation how much of the chemical product and substances will be left in the paper from the used amount of the chemical product. It is not very often we find classified products. The ones that remain in the products and that can be critical are the products that are added there to change the paper properties, OBAs, dyes, sizing and coating chemicals and so on.	Accepted. Thanks for this useful feedback.
261	Section 4.4 Criterion 4b pg.88	Q. Should the restriction of SVHCs be extended to mixtures used during processing or only to those mixtures where SVHCs are likely to remain in the final product?	The chemical approach should be considered regarding the whole production process and not only the content of chemicals in the final product. The environmental impacts of chemicals during the production process have to be reduced even if these chemicals are not present in the final product. This comment applies for all the criterion 4.	Accepted. Criterion 4c to 4h) actually focus on different hazardous substances whether they remain in the final product or not.
262	Criterion 4c) ChlorinePg.89	Q. Should ECF bleaching only be permitted in line with the use of certain technologies and/or chlorate monitoring? Or can this be considered to be already controlled to a satisfactory extent by AOX criteria?	If chlorine bleaching techniques are allowed, chlorine production should not come from facilities that still use Mercury cell techniques. The AOX criteria proposed above are a good control mechanism for ECF bleaching.	Rejected: chlorine bleaching itself will not be allowed and how to trace back what method was used to generate the chlorine that was used to manufacture a chlorine-based bleaching agent such as ClO <sub>2</sub> seems to present an excessive workload that is difficult to verify (too many steps away from the applicant). The comments about AOX are accepted.
263	Section 4.4 Criterion 4c pg. 89	TCF vs ECF	ECF bleaching has improved a lot. In the BREF document ECF and TCF are considered as Best available techniques, still bleaching techniques vary you can have very good ECF bleaching sequences and bad ones.... Please check if we can prescribe modern ECF bleaching: Modern ECF bleaching minimises the consumption of chlorine dioxide by using one or a combination of the following bleaching stages: oxygen, hot acid hydrolysis stage, ozone stage at medium and high consistency, stages with atmospheric hydrogen peroxide and pressurised hydrogen peroxide or the use of a hot chlorine dioxide stage, Combine it with a very low AOX level: <0.15 for bleached pulp	Accepted in principle but this would need to be discussed with stakeholders first – would this be something that is more relevant to non-EU ECF production? Because in the EU we have BREF..

No.	Reference: - section/task -page	Subject of the comment	Comment	Response
26 4	Criterion 4c) ChlorinePg.89	Q. Based on energy and chemical requirements, are there any LCA-based arguments that can be used to justify/dismiss the exclusion of ECF in favor of TCF?	The Wennerstrom, report show strong LCA-based arguments to justify the exclusion of ECF in favor of TCF: • Lower OX content and DCM content in pulp• Lower water consumption• Lower colour and AOX content in the bleach plant discharge• Potential to fully close the bleach plant and reduce the effluent discharge to zero. • Lower investment and operating costs, TCF bleaching gives the opportunity to reduce the effluent load, even to zero discharge. Since the bleach plant filtrate does not contain any chlorides, the bleach plant discharge can be evaporated and the dissolved organic material can be sent to the recovery boiler. "The final goal is to definitively eliminate chlorine chemistry and to implement a bleaching chemistry only based on oxygen, peroxide and ozone." (Pr. Emil Germer, State of the art Industrial Ozone Bleaching.)	Rejected: In the BREF document ECF and TCF are equally considered as Best available techniques,
26 5	Criterion 4c) ChlorinePg.89	Q. Are there any technical arguments (in terms of pulp or paper quality) that could be used to justify the continued use of ECF?	As shown in the Wennerström report, experiences from TCF pulp producers Södra and SCA since mid-nineties shows that TCF is at least as good as ECF and in some cases even better performant..	Rejected: In the BREF document ECF and TCF are considered as Best available techniques,
26 6	Criterion 4c) ChlorinePg.89	Q. Would it be feasible to require TCF for Newsprint Paper based on current market trends and industry practice?	Yes. Newsprint often use high content of recycled pulp and the virgin pulp is mostly mechanical pulp and do not bleach with chlorine dioxide	
26 7	Section 4.4. Criterion 4c pg. 90	Q. Should ECF bleaching only be permitted in line with the use of certain technologies and/or chlorate monitoring? Or can this be considered to be already controlled to a satisfactory extent by AOX criteria	Relevant AOX criterion is enough	Accepted
26 8	Section 4.4 Criterion 4e pg.92	requirement for residual monomers	Finland welcomes the removal of the general requirement for all residual monomers. It is not justified if the other production chemicals than polymers can include much more dangerous substances.	Accepted.



No.	Reference: - section/task -page	Subject of the comment	Comment	Response
269	4 e) Residual monomers (Acrylamide) pg.92		Denmark cannot support the limitation of the requirements on residual monomers other than acrylamide. And we find the rationale in the Technical report to be very one-sided. Based on our experience from handling paper chemicals in the Nordic ecolabel we have seen products which cannot fulfil the maximum of 100 ppm, hence in our opinion the requirement is needed. Even if the residual monomer is not ending up in the final products it will end up in the waste water stream and still cause an environmental problem. To verify the products you need a declaration from the chemical producer hence there is little extra administrative burden for applicants or CB's in verifying the 100 ppm limit.	Rejected. What is the environmental fate of acrylamide residual monomers that is causing the environmental problem exactly? Our understanding is that it ends up in paper sludge which is typically incinerated onsite due to its calorific value.
270	Section 4.4 Criterion 4e pg.92	Monomers	Please check if there are other Monomers that should be limited like Melamine-formaldehyde-resins with monomers above 100 ppm of formaldehyde or methanol, Acrylamide should be allowed up to 700 ppm.	Rejected. The 100ppm residual monomer approach for acrylamide was criticised for being overly strict and not linked to net environmental problems, so to copy this criticised approach for other residual monomers is not desirable.
271	Section 4.4 Criterion 4e pg.92	How is "calculated on the basis their solid content" interpreted in applications?	Based on the safety data sheets of our license holders, there is no acrylamide	Accepted. One of the potential problems with this criterion was that it was asking for proof that went beyond normal SDS reporting requirements. Residual acrylamide could be present above 100ppm but suppliers are only required to report it if it is >1000ppm.
272	Section 4.4. Criterion 4e pg. 92	The entire general reference to residual monomers is proposed to be removed and only the specific requirement for acrylamide is proposed to be maintained	We support the removal of the criterion on residual monomers other than acrylamide. The monomers should be treated as other classified substances.	Accepted.
273	Section 4.4. Criterion 4e pg. 92	Q. How is "calculated on the basis their solid content" interpreted in applications	The purpose of the sentence is to prevent the chemical supplier to dilute the monomers content with water. However, it should be written "...their active solid content" because as it is now, the monomer content can be diluted with another inert powder instead.	Accepted. Thank you for the clarification
274	Section 4.4 Criterion 4e pg.92	Criterion 4e) Acrylamide	We welcome the deletion of the general reference to residual monomers and agree to the justification. However, we see no justification on a scientific, regulatory or a risk reduction basis in maintaining a limit for one specific substance, i.e., acrylamide, which cannot be supported and is discriminatory.	To be discussed further. Raising the limit to 1000ppm would ensure that SDS is a suitable means of evidence.
275	Section 4.4 Criterion 4e pg.92		Acrylamide concentrations above 1000 ppm are already captured by criterion 4a. Please consider very carefully whether you want to generate extra paperwork only because of the difference of 300 ppm.	Accepted in principle. To be discussed further.

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
27 6	Section 4.4 criterion 4e pg. 92	Criterion 4e)	We welcome the deletion of the general reference to residual monomers and agree to the justification. However, we see no justification on a scientific, regulatory or a risk reduction basis in maintaining a limit for one specific substance, i.e., acrylamide, which cannot be supported and is discriminatory. Delete Criteria 4e.	To be discussed further. Raising the limit to 1000ppm would ensure that SDS is a suitable means of evidence.
27 7	Selected Text 3, 4, 7 pg.. 89 4.4 Criterion 4f pg. 93	Criterion 4f)	The extension of the restrictions on surfactants from tissue paper to all paper types and all applications need to be carefully evaluated by industry. This process has not yet been completed. Most surfactants that are used in production will also be consumed in the process. Only a very small amount of surfactants will emitted to environment with waste water. To remove the restriction on surfactants	Accepted in principle but further details and discussion required to validate these claims
27 8	Criterion 4f) SurfactantsPg.93		EEB and BEUC welcome that the criterion is suggested to cover all surfactants, not only deinking chemicals. However, the EEB and BEUC are strongly against the watering down of the criterion based on the suggested wording. While, both organisations agree with the aim of simplifying the interpretation of the requirement, this is not a reason to introduce less strict criteria. The text should be changed considering the following: • All surfactants should be readily biodegradable as well as biodegraded anaerobically, as for the detergents group. • The worse category of inherent ultimate biodegradability should not be used. If a thorough analysis of the surfactants used in the pulp and paper industry would show that a change to only readily surfactants is impossible, we suggest to move in the same direction as the Nordic Swan. This label has a criterion that when surfactants are used in higher amounts than 100g / tone of pulp, each individual surfactant used must be readily biodegradable. However, if less than 100g / tone of pulp is used then each individual surfactant only has to be ultimately biodegradable.	Rejected in principle to align with EU Ecolabel detergents because the required functionalities and conditions in which they must work are not equivalent. Possible alignment with the Nordic approach can be further discussed and may be possible if examples can be provided.
27 9	Section 4.4 Criterion 4f pg. 93	All surfactants used shall demonstrate ready or inherent ultimate biodegradability (see test methods and pass levels below).	We suggest to align the requirement with those in the detergent products criteria. The following sentence should be added: « All surfactants shall be readily degradable (aerobically).All surfactants classified as hazardous to aquatic environment shall be in addition anaerobically biodegradable”.	Rejected. First a review of the surfactants used in products must be completed before knowing if this will be possible
28 0	Section 4.4 Criterion 4f pg. 94	Can this requirement be extended to all surfactants used in the paper production process without major problems for implementation?	We suggest to keep this criterion as it is	O.K.

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
28 1	Section 4.4 Criterion 4f pg. 94	From practical experience, are there any issues with biodegradability testing, especially with OECD 301?	We don't have experience in this area	O.K.
28 2	Section 4.4 Criterion 4f pg. 94	Can this requirement be extended to all surfactants used in the paper production process without major problems for implementation?	If considering to extend this criterion to apply all surfactants then there must be first an analysis on the magnitude of the issue with the surfactants. We will not agree with an extension of the criterion before we see the environmental problems and how big there are with the used surfactants.	Accepted. Input from stakeholders is needed in order to know this.
28 3	Section 4.4 Criterion 4f pg.93 - 94	Criterion 4f) Surfactants	A: The extension of the restrictions on surfactants from tissue paper to all paper types and all applications need to be carefully evaluated by industry. This process has not yet been completed. We recommend having a more detailed discussion at the proposed sub-working group meeting on chemical. Assessment and verification of compliance with Criteria 4.f) Safety data sheets for surfactants itself should not be provided. Demonstrating the compliance should be organized in such way that chemical suppliers would not be required to expose their surfactant suppliersB: Under the existing criteria silicones have been evaluated as surfactants. Silicones do not satisfy the requirement regarding ready or inherent ultimate biodegradability. Functional silicones are respectively mineralised by thermal process, disposal under controlled conditions, or in the latter case adsorption to the sludge particles. In soil, functionalised silicones are not mobile and undergo clay catalysed chemical degradation to lower molecular weight materials that are mineralised through biological and chemical degradation processes. The amount of functional silicones used for the deinking of pulp are considerably lower (15-20 times less) compared to fatty acids / soaps. B: This has been recognised by the Nordic Ecolabel and the use of functional silicones is accepted on condition that the sludge from the deinking process is incinerated, landfill is not accepted.	Accepted. We welcome further discussions in order to better understand the situation with surfactants
28 4	Criterion 4g) Biocidal product restrictions pg.95		EEB and BEUC are against the inclusion of tissue paper treated with biocides in the scope of the EU Ecolabel. The following clause should be added to the scope and definitions part: Tissue papers that are "treated articles" according to the biocidal products regulation are not in the scope of the EU Ecolabel. If biocides are used for other purposes, they should be approved by the Biocidal products regulation. This would improve the environment also if the production is outside EU.	Accepted in principle but further discussion needed.
28 5	Criterion 4 g) Biocidal product restrictionPg.95		Denmark suggest to make it clear that tissue paper treated with biocidal products cannot be ecolabelled.	Accepted in principle but further discussion needed.

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
28 6	Section 4.4 Criterion 4g pg. 95	Q. Is there any added value in specifically requesting that active substances and biocidal products used must be approved or currently under evaluation in accordance with the Biocidal Products Regulation (EC) No 528/2012?	Yes it is necessary to mention Biocidal Product Regulation as it is done for REACH and CLP Regulation in criterion 4a. Moreover only the active substances and the biocidal products who are allowed by the regulation 528/2012 can be used. It is important to also add the following sentence: "be approved or currently under evaluation.	Accepted in principle but further discussion needed because these products may end up out of the scope in the end.
28 7	Section 4.4 Criterion 4g pg. 95	biocidal products	It could be made reference to the article 3.1.a) of the regulation 528/201 as it is done for REACH and CLP in criterion. 4a	Accepted in principle.
28 8	Section 4.4 Criterion 4g pg. 95	Q. With tissue paper, would be of added value to add specify the following additional text or similar: "No biocidal products shall be applied to the Tissue Paper product with the intention of providing a disinfective effect on the final product".	Yes it is necessary	Accepted in principle.

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
28 9	Section 4.4 Criterion 4h pg. 96	The levels of ionic impurities in the dyestuffs used shall not exceed the following: Silver 100 ppm; Arsenic 50 ppm; Barium 100 ppm; Cadmium 20 ppm; Cobalt 500 ppm; Chromium 100 ppm; Copper 250 ppm; Fe 2,500 ppm; Mercury 4 ppm; Manganese 1,000 ppm; Nickel 200 ppm; Lead 100 ppm; Selenium 20 ppm; Antimony 50 ppm; Tin 250 ppm; Zinc 1,500 ppm.	Blue dyes cannot meet this limit for Copper: the blue dye is used in food contact and health care wipes. To remove this limit	Accepted in principle, but there is already text allowing for the exemption of Copper in dye
29 0	Criterion 4h) Dyes, dyestuffs and pigments pg.96		The EEB and BEUC would like to draw the attention to the possible use of mineral oils in dyes, dyestuffs and pigments. For tissue products we suggest to exclude the use of mineral oils. It is also relevant to minimize the content of mineral oils in recycled paper used for food packaging, which may be the case for kitchen towel rolls. The European Food Safety Authority notes in their scientific opinion on Mineral Oil Hydrocarbons (MOH) in Food that a significant source of dietary exposure to MOH may be the contamination of food by the use of recycled paperboard as packaging material. It can be effectively prevented by the inclusion of functional barriers into the packaging assembly. Other measures may include the segregation of recovery fibre sources intended for recycling and the increasing of the recyclability of food packages by avoiding the use of materials and substances with MOH in the production of food packages <a href="https://www.efsa.europa.eu/en/efsajournal/pub/2704">https://www.efsa.europa.eu/en/efsajournal/pub/2704</a>	Packaging material is out of the scope of the tissue product group definition. The segregation at source lays out of the capacity of tissue manufacturer.  Industry guideline on food contact paper and board (tissue paper, kitchen towels and napkins are covered by specific guidelines and are excluded from the scope of this Guideline): <a href="http://www.cepi.org/system/files/public/documents/publications/foodcontact/2012/Industry%20guideline-updated2012final.pdf">http://www.cepi.org/system/files/public/documents/publications/foodcontact/2012/Industry%20guideline-updated2012final.pdf</a>  BfR Recommendation: <a href="https://bfr.ble.de/kse/faces/resources/pdf/360-english.pdf">https://bfr.ble.de/kse/faces/resources/pdf/360-english.pdf</a>  Commission Statement concerning the coatings of food contact materials: <a href="http://europeantissue.com/sustainability/health-and-safety/product-safety/">http://europeantissue.com/sustainability/health-and-safety/product-safety/</a>

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
29 1	Regarding criterion 4h) Dyes, dyestuffs and pigments		— Low Molecular Weight phthalates (DBP, DIBP, BBP, and DEHP): The use of LMW phthalates in dyes is already forbidden since 21.2.2015 (sunset date).Dyes and dye stuffs and pigment dispersions are mixtures according to REACH Art. 3; manufacture and use of LMW phthalates in these dyes would have to be authorized. But because there is no Application for Authorization for these uses, all downstream users in Europe were obliged to re-formulate their mixtures before 21.2.2015.— High Molecular Weight phthalates: HMW phthalates are not classified. Restrictions are limited to toys and childcare articles that can be put by children into their mouth (see <a href="http://echa.europa.eu/documents/10162/31b4067e-de40-4044-93e8-9c9ff1960715">http://echa.europa.eu/documents/10162/31b4067e-de40-4044-93e8-9c9ff1960715</a> for details)	Accepted. Thank you for this background information.
29 2	Section 4.4 Criterion 4h pg. 96	4h) Dyes, dyestuffs and pigments	What about inks?	Clarity is needed about terminology that is accepted by the industry to distinguish between dyes, dyestuffs and printing inks. Some clear definitions needed first.
29 3	Section 4.4 Criterion 4h pg. 96	Chromium	Chromium and not chromium	Will depend on final opinion of legal services whether or not to use capital letters for elements
29 4	Section 4.4 Criterion 4h pg. 96	Criterion 4h)	a) The proposed criteria i “None of the aromatic amines ...” is ambiguous and may lead to confusion as the aromatic amines as such are not used in the paper manufacturing process. A potential risk could only result from a colorant which cleaves into one of the listed amines which is then properly addressed. As the listed amines are cmr, any use is banned anyway by criterion 4a.Regarding the statement in the rationale “With paper products, in light of the uncertainty about testing methods as a final assurance, the first option is proposed although.” standard methods exist for testing on the presence of these amines e.g. as they a regulated in food contact application by BfR.b) Regarding criteria ii: Here pigments based on aluminium are excluded. Kaolins are aluminumsilkates present in nature in abundance. Kaolin therefore should be exempted from this requirement.	Thank you for the clarification about aromatic amines. It seems that it will be necessary still to refer to the amines that can potentially cleave during processing to form REACH restricted amines in-situ. Agreed that the distinction between aluminium based pigments and aluminosilicate based pigments should be made
29 5	Section 4.4 Criterion 4h pg. 98	Are phthalates a concern in dyes, dye stuffs and pigment dispersions? Are any classified phthalates used in these applications?	No experience	O.K.
29 6	Technical Report 1.0 for the revision of EU Ecolabel criteria for paper products, page 98	Q. Any experience with testing paper for restricted AA	We regularly have paper coloured with our dyes tested for restricted aromatic amines. Water extracts prepared according to method B80.56 of 64 LFGB and to standards EN645, 647 and 15519. Determined by HPLC and MS detection in the water extract. Tested at ISEGA in Germany	Thank you for this useful feedback.

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
29 7	Technical Report 1.0 for the revision of EU Ecolabel criteria for paper products, page 98	Q. Are phthalates a concern in dyes and pigments?	I haven't come across any paper dyes based on or including phthalates in the production	Thank you for this feedback.
29 8	Section 4.4 Criterion 4h pg.96-98	Criterion 4h) Dyes, dyestuffs and pigments	a) The proposed criteria i "None of the aromatic amines ..." is ambiguous and may lead to confusion as the aromatic amines as such are not used in the paper manufacturing process. A potential risk could only result from a colorant which cleaves into one of the listed amines which is then properly addressed. As the listed amines are cmr, any use is banned anyway by criterion 4a.Regarding the statement in the rationale "With paper products, in light of the uncertainty about testing methods as a final assurance, the first option is proposed although." standard methods exist for testing on the presence of these amines e.g. as they are regulated in food contact application by BfR.b) Regarding criteria ii: Here pigments based on aluminium are excluded. Kaolins are aluminumsilicates present in nature in abundance. Kaolin therefore should be exempted from this requirement.	Thank you for the clarification about aromatic amines. It seems that it will be necessary still to refer to the amines that can potentially cleave during processing to form REACH restricted amines in-situ. Agreed that the distinction between aluminium based pigments and aluminosilicate based pigments should be made.
29 9	Section 4.4 Criterion 4i pg. 99	Wet strength agents that contain glyoxal must not be used in the production of the eco-labelled tissue paper.	The proposed and actual criterion Ecolabel 4k (residual substances) at point 5 (product safety) asks for a maximum content of glyoxal of 1.5 mg per dm2, for paper produced with recycled fibres or a mixture of recycled and virgin fibres. The use of both wet strength/dry strength agents containing glyoxal can help producers to develop innovative products/solutions. The restrictions of such class of chemicals might reduce the opportunity to label new products, without any significant improvement of safety for consumers. The threshold of 1.5 mg per dm2 of tissue paper is safe for consumers, as stated in the following documents: EUROPEAN COMMISSION HEALTH & CONSUMER PROTECTION DIRECTORATE-GENERAL Directorate C - Public Health and Risk Assessment, C7 - Risk assessment SCIENTIFIC COMMITTEE ON CONSUMER PRODUCTS, Opinion on Glyoxal (June 2005).BfR recommendation XXXVI. Paper and board for food contact, chapter C (July 2015).Any glyoxal in the recycled tissue has not been added during the manufacturing process but comes from the paper for recycling. The recycler has no means of determining which paper has glyoxal in. (Repeated testing of recycled tissue products rarely shows any residual glyoxal content). Remove the restriction on using glyoxal based wet strength resins. (This should be covered by the CLP regulations).New text proposal: If glyoxal based chemicals are added during the manufacturing process then the final tissue paper shall not contain more than:1.5 mg/dm2 glyoxal according to DIN 54603	Accepted in principle. This criterion could be interpreted as an obstacle to the recycling of paper and, in wider terms, the circular economy. How likely is it for paper based on recycled fibres to exceed 1.5mg/dm2?  Nonetheless, the restriction of the use of glyoxal in the production process should continue to apply equally for paper based on virgin or recovered fibres.. BfR as of 2015: <a href="https://bfr.ble.de/kse/faces/resources/pdf/360-english.pdf">https://bfr.ble.de/kse/faces/resources/pdf/360-english.pdf</a>

No.	Reference: - section/task -page	Subject of the comment	Comment	Response
300	JRC Technical Report 1.0, May 2016 – Criterion 4i) – Page 99	Wet strength agents	<p>INTERGRAF is the European federation representing the European printing industry. We have been very active in the discussion on the development of the EU Ecolabel for printed paper (2012/481/EU), which is closely related to the EU Ecolabel for newsprint and copying and graphic paper. Indeed criterion 1 of the EU Ecolabel for printed paper requires the use of paper bearing the EU Ecolabel. The Technical Report raises a question on the applicability of wet strength agent criteria to Copying and Graphic Paper or Newsprint Paper. To our views, it is clearly applicable as it is one of the criteria for the EU Ecolabel for printed paper. Indeed, the criteria on the use of wet strength agents in the EU Ecolabel for printed paper is as follows: Criteria 3a: <i>'Wet strength agents may be used only if the recyclability of the finished product can be proved'</i>. The User Manual states the following: <i>'Regarding sub criterion 3(a), if the paper producer(s) declare(s) that 'wet strength agents' were not used in the paper production process, there is no need to provide to the Competent Body any test report.</i> 'The inclusion of a criterion on wet strength agents in the EU Ecolabel for printed paper is therefore intended to cover the use of wet strength agents in the manufacturing of paper. When applying for the EU Ecolabel for printed paper, the applicant shall purchase paper bearing the EU Ecolabel and request in addition a declaration that wet strength agents have not been used from the paper supplier. As the requirement on wet strength agents is on the substrate, the criteria should not be included in the EU Ecolabel for printed paper. Intergraph asks for the inclusion of this requirement in the EU Ecolabel for newsprint and copying and graphic paper. This will ensure that the paper bearing the EU Ecolabel for newsprint or copying and graphic paper systematically qualifies for its use in the EU Ecolabel for printed paper. This will also make the procedure more coherent for the applicant and reduce administrative burden, in particular for SMEs.</p>	Accepted in principle but further discussion needed. So you are requesting an explicit ban on the use of wet strength agents in copying and graphic paper and newsprint paper?
301	Criterion 4i) Wet strength agents (Tissue Paper only) pg.99		<p>The EEB and BEUC are not in favor of having a derogation for epichlorhydrin and 1,3-dichloro-2-propanol, especially as less hazardous alternatives are listed in the Technical Report. These substances are classified Carc 1B, H350. 3-monochloro-1,2-propanediol is not officially classified, but self-classified as Carc 2 and Repr 1B. Derogation requests for such substances should be justified, and this is not clearly shown in the information provided in the Technical Report.</p>	This issue needs to be discussed further with stakeholders from the tissue paper industry.



No.	Reference: - section/task -page	Subject of the comment	Comment	Response
30 2	Section 4.4. Criterion 4i pg. 100	Are wet strength agent criteria applicable to Copying and Graphic Paper or Newsprint Paper? The Nordic Chemical Module has a general requirement of 0.01% for ECH, DCP and CPD, which is more stringent than what they have for Tissue Paper (0.05%).	The more stringent criterion in Nordic Ecolabel is mainly aimed to grease-proof paper and coffee filter paper and not to C&G paper. One of the reasons behind the limit for tissue paper in NS was that by the time the criterion was set there was not enough third generation wet strength agents on the market (0,01% ECH, DCP and CPD) according to the received information. However, I suggest that JRC investigates the market for this kind of chemicals today. We would also like to suggest a new criterion on the chemicals used on the Yankee cylinder that contain the same harmful substances as the wet strength agents. You could use the criterion in NS.	Accepted. Thank you for the clarification and we will look further into the market for wet strength agents, especially 2nd and 3rd generation
30 3	Criterion 4j) Softeners, lotions, fragrances and additives of natural origin (Tissue Paper only) pg.101		The EEB and BEUC are not in favor of fragranced tissue papers, as these products are not necessary. Lotions and additives are also problematic and should be restricted as much as possible.	Accepted in principle but further discussion needed. So you are requesting an explicit ban on the use of wet strength agents in copying and graphic paper and newsprint paper?
30 4	4j Fragrance pg.101		Denmark can support printed and coloured tissue, but strongly opposes the inclusion of fragranced products. We understand that fragranced products are used in some parts of Europe. Market data for these products are not included in the Technical report but we assume these products are niche products that constitute a minor part of the market. Nonetheless having fragranced ecolabelled tissue is sending the wrong signal since the use of fragrance in these products is not needed and the exposure to fragrances will increase the risk of developing allergy for the consumer.	This issue needs to be discussed further with stakeholders from the tissue paper industry
30 5	Section 4.4 Criterion 4j pg. 102	Should fragrances continue to be permitted in EU Ecolabel Tissue Paper	Yes, they should, otherwise it will be a problem with the sale	Accepted. Thank you for the clarification and we will look further into the market for wet strength agents, especially 2nd and 3rd generation products.
30 6	Section 4.4 Criterion 4j pg. 102	Any relevant experiences to share with challenges implementing this criterion in existing Tissue Paper licences	No experience	

No.	Reference: - section/task -page	Subject of the comment	Comment	Response
307	Section 4.4. Criterion 4j pg. 102	Should fragrances continue to be permitted in EU Ecolabel Tissue Paper?	Fragrances should be banned in EU Ecolabelled tissue paper. They have no function there and only expose people who does not want to be exposed to chemical substances.	
308	Section Criterion 4j pg. 102	Q. Should fragrances continue to be permitted in EU Ecolabel Tissue Paper?	We support a ban of fragrances because they are not useful for the main purpose of the product.	
309	Section 4.4 Criterion 4j) pg. 102	Biocides, fragrances, lotions	Please add: Sanitary paper products shall be produced without the addition of lotions, fragrances and bacterial suspensions.	Ok, thanks for your comment.
310	Section 4.4 Criterion 4j) pg. 102	perfumes and other fragrances in tissue paper	EU Ecolabel should adopt the approach of the Nordic Ecolabel: Perfumes and other fragrances are not permitted in the paper product. Essential oils or plant extracts, where the principal function is to provide scent, are not permitted.	Accepted in principle and will be reflected in later proposals for tissue.
311	Section 4.4. Criterion 4k pg. 103	All tissue products shall fulfil the following requirements:	Leave this requirement under "Product safety" and set a criterion for example absorption capacity of the kitchen paper and lack of wet strength in toilet paper in "Fit for use" as in NS	Accepted in principle and will be reflected in later proposals for tissue.
312	Section 4.4 Criterion 4k pg. 104	Which extraction method should be specified for formaldehyde and PCP (hot water or cold water)?	EN 1541 - Paper and board intended to come into contact with foodstuffs. Determination of formaldehyde in an aqueous extract	Accepted in principle and will be reflected in later proposals for tissue.
313	Section 4.4 Criterion 4k pg. 104	Are there any international equivalents to DIN 54603 that could be used for glyoxal analysis?	I am afraid not	OK, thanks for your comment.

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
31 4	Section 4.4 Criterion 4k pg. 104	Can the avoidance of certain recovered paper grades reduce the possibility of finding these compounds to such an extent that proof of their use could be assumed as a justification to avoid testing?	Maybe, but what would be the basis for the selection of such classes of paper?	The choice of a particular grade will be made primarily for other reasons (like fibre quality, fibre type (brown/white), cost and availability). One secondary consequence of the choice would be the reduced presence of certain undesirable residuals.
31 5	Section 4.4 Criterion 4k pg. 104	When deemed that testing should be carried out, what would be an appropriate sample frequency (either per unit time or per production volume/batch)	Per production volume/batch.	OK, thanks for your comment.
31 6	Selected Text 3,5 pg.. 105 4.5 pg.105	Criterion 5: Waste Management	It is not a hotspot as proved by the LCA studies. We suggest to not strength the requirement with a threshold for waste and stay on a qualitative approach.	Accepted
31 7	Section 4.5 pg. 105	Waste management	It would be sufficient to implement a waste management system (on-site) with evidence of continuous improvement but without limit value. An ISO 14001 certification (or equivalent) would be a way to meet this criterion.	Accepted
31 8	Criterion 5: Waste Management Pg.105	Waste management	The EEB and BEUC are in favor of a criterion on waste minimization as this will improve the environment also for production sites outside Europe manufacturing ecolabelled goods. As much residues from production as possible should be recycled. This requires prior thorough separation and usage of non-toxic print. Streams sent for incineration or agricultural use should be minimized.	Partially accepted: The criterion will be addressed qualitatively to ensure the constant improvement of the waste management system. Lack of uniformity between different sites coupled by insufficient data availability hinders the possibility to introduce substantiated quantitative criterion.
31 9	Criterion 5 Section 4.5 pg.105	„Procedures for waste separation, preparing for reuse and recycling”	Comment: In accordance with the Waste Framework Directive (2008/98/EC) term re-use refers only to products or components that are not waste. However to waste refers term preparing for re-use. Therefore it is recommended to change abovementioned fragment. “The majority of residues generated during pulp and paper process could be prepared for reused, recycled or recovered.”	Accepted
32 0	Criterion 5: Section 4.5 pg.105	„Procedures for waste separation, preparing for reuse and recycling”	Comment: As aforesaid “A waste management system is a valuable tool that ensures control over the material flow, and drives to waste prevention, preparing for reuse, recycling, other recovery, recycling, and safe disposal.”	Accepted

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
32 1	Criterion 5: Section 4.5 pg.105	„Procedures for waste separation, preparing for reuse and recycling”	Comment: It has been modified in due to show the waste hierarchy, which is explained in Waste Framework Directive (2008/98/EC). Moreover, it needs to be emphasized that preparing for reuse and recycling are recovery methods. Therefore it is worth adding word “other” before “recovery”. “Some of the recycling recovery options for paper mill residues are as follows”	Accepted
32 2	Criterion 5: Section 4.5 pg.105	„Procedures for waste separation, preparing for reuse and recycling”	Comment: Whole context shows that authors had in mind word recovery instead of recycling. For example practical application of land spreading in agriculture should not be considered as a recycling, because of the fact that in that case there is no dealing with technological process which ends with a product. However mentioned example is definitely a recovery option.	Accepted
32 3	Section 4.5. pg. 105	Continuous improvement objectives and targets.	Waste management is not always an important environmental aspect. Demand environmental management system including waste management. ISO 14001 or EMAS certificate can be used as verification. By asking for an environmental management system instead of demanding goals and improvement for waste as environmental management systems demand goals and improvement for important environmental aspects. Mills where waste is not an important environmental aspect will work with other aspects more important for them which will benefit the environment better.	Accepted with comments: the criterion will be addressed qualitatively. No further change has been proposed
32 4	Section 4.5 pg.105	Slimicides and antimicrobial substances	Be careful they are biocidal products.	
32 5	Section 4.5 Criterion 5 pg. 106		Comment: It seems that the text relates to table no 42 (not 43).	Accepted: Typo mistake
32 6	Section 4.5 Criterion 5 pg. 106	Waste management	Comment: Waste term includes also residues. “Data presented in Table 4342 should be treated indicatively. For example, integrated Kraft liner is found in a range of 0 – 20kg, and although non-integrated ranges from 0 – 50kg the BREF for pulp and paper (JRC, 2015) states that non-integrated production normally results in very low solid residues. The production of 50kg of waste may therefore be from a single low performing plant.”	Accepted
32 7	Section 4.5 Table 44 pg. 107	“Pre-treatment of process residues before preparing for reuse or recycling”	“Pre-treatment of process residues before preparing for reuse or recycling” Comment: Explanation is above regarding page no 101 “dewatering e.g. of sludge, bark or rejects and in some cases drying to enhance reusability before utilisation treatment (e.g. increase calorific value before incineration)” Waste Framework Directive (2008/98/EC) does not use term “utilization”, “biological stabilisation before dewatering, in case agricultural utilisation application is foreseen: Comment: As aforesaid “External material utilisation recovery” Comment: As aforesaid “Material utilisation Recovery of suitable waste from pulp and paper production can be done in other industrial sectors, e.g. by: Comment: As aforesaid “The suitability of waste fractions for off-site utilisation recovery is determined by the composition of the waste (e.g. inorganic/mineral content) and the evidence that the foreseen recycling recovery operation does not cause harm to the environment or health Comment: As aforesaid	Accepted

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
328	Section 4.5 pg.108	Q: Is it feasible to set maximum waste disposal limits?	Setting maximum limits should be well discussed - especially for recycled fibres. See comment #12 (two below)	Accepted: the criterion will be addressed qualitatively
329	pg.104 Section 4.5 pg. 108	“Although it is possible to achieve a zero waste to landfill target, this requires access to end markets which should be developed over time and will vary depending on local infrastructure and demand.”	Comment: Above target leads to the question whether it is feasible and how that target should be considered, because e.g. as the result of incineration comes out slags and ashes – ashes because of their composition are usually landfilled.	Accepted: the criterion will be addressed qualitatively
330	Section 4.5 pg.108	Q: Is it feasible to set maximum waste disposal limits?	if any maximum limits should be set, then they should base on bone dry weight (not on wet weight like in table 42)	The criterion will be addressed qualitatively
331	Section 4.5 pg.108	Q: Is there justification for having a higher limit for RCF pulp production?	The resulting waste during the process of stock preparation of recycled fibres is mainly depending on the waste paper grades and the contamination. The rejects in integrated RCF-mills is normally waste, that has to be deposited outside the mill (deinking sludge, non-fibrous materials (plastic, metal, sand). The amount varies depending on the used grade of waste paper Unsorted waste paper or household w	Accepted: the criterion will be addressed qualitatively
332	Discussion points: Section 4.5 pg.108	Is it feasible to set maximum waste disposal limits	To make a decision in this scope, it would be necessary to have data from waste treatment facilities in Poland - in the same configuration as in table no 43. According to the declaration of the Association of Polish Papermakers, our waste treatment facilities are among the most modern in Europe - so it would be good to compare to the others. If we are one of the best, the establishment of such restrictions should not be a problem for Poland. Of course the question always arises whether such restrictions will not eliminate completely other technology (but it would not be a problem for Poland, as long as it is not used in our country).	The criterion will be addressed qualitatively
333	Section 4.5 pg.108	Is there justification for having a higher limit for RCF pulp production?	In that case it is crucial to consult it with the technology experts – if the achievement of a lower value is not technically possible, it would be necessary to set higher allowable thresholds so that such technology would not be completely eliminated.	Accepted: the criterion will be addressed qualitatively
334	Section 4.5 pg.108	Is it feasible to provide waste limits on an end product basis as well as a pulp type basis?	It depends on whether are available separate data for a product and a pulp	Accepted: the criterion will be addressed qualitatively

No.	Reference: - section/task -page	Subject of the comment	Comment	Response
33 5	Section 4.5 pg.108	Q: Is it feasible to set maximum waste disposal limits?	No. It is not feasible and it is not recommended. Waste definition if legal definition which could be different depending on the country / region of the World. Moreover, waste disposal and recovery facilities availability strictly depend on local condition. Furthermore, one of the main driver for waste production is wastewater treatment. To force reducing waste generation would means to go in contrast with the need to treat waste water. For recycled paper, waste is linked to the quality of the domestic collection and the need to recycled also paper for recycling of lower grades. Setting a limit to waste disposal would jeopardize the effort to recycle more.	Accepted: the criterion will be addressed qualitatively
33 6	Section 4.5 pg.108	Q: Is there justification for having a higher limit for RCF pulp production?	In theory yes, but we ask not to set a limit for waste disposal. Any limit would be difficult to set as it depends on local condition, local quality of paper for recycling and it would penalize companies using lower grades of paper for recycling, which is against the target to increase recycling.	Accepted: the criterion will be addressed qualitatively
33 7	Section 4.5. pg. 108	Is it feasible to set maximum waste disposal limits?	We don't support a comprehensive criterion on waste. Our experience is that in this industry all actors are already working on waste management. Moreover, ecolabelling has no power to change anything in this sector. The other criteria in these products groups are already very comprehensive.	Accepted: the criterion will be addressed qualitatively
33 8	Selected Text 3, 6, 3 pg.. 105 Section 4.6 pg. 109	Table 45: Fitness for use criteria	A large number of type papers that can be submitted to the Ecolabel decision for copy and graphic papers that are not covered by the scope of the standards EN 12281 and EN 12858. Example: coated papers, lightweight coated papers, offset papers, preprint papers, inkjet papers, envelope papers, publishing papers and educational papers. The standard EN 12281, was developed for an 80 gm-2 paper and there are different basis weights (like 70, 75, 90, 100, 110, 120 and even higher basis weights) and sizes (A3, SRA3, A3+, letter, legal) used for office usage, which can apply for Ecolabel, and not adequate to be verified by the methodology stated namely the jam rate test. In certain EU countries is difficult to find accredited labs able to certify papers according with these standards (EN 12281 and EN 12858). The idea of having this criteria for safety reasons and in relation with papers that will be into contact with food is not feasible since a specific paper may or may not be used for that application (contact with food). If a specific paper is going to be used for that application, the producer will have in any case to apply the specific legislation. We do find that a paper that is not fit to be use will not be chosen by consumers. Regulating what is already regulated by the market or anticipating applications that might not occur is not feasible. Moreover almost all paper producers have internal procedures to manage the complaints on their products under their ISO 9001 Quality Management System Eliminate the criteria or substitute by compliance with ISO 9001 or similar.	Accepted

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
33 9	TR 4.6 Criterion 6: Fitness for use, p.109		We recommend to keep the current wording: The product shall be fit for use. There is no need to add any further requirement. Please consider the difference between “product definition and characteristic” on one hand, and “fitness for use” on the other hand. For example, “toilet paper” has to be defined and specified according to EN ISO 12625-1. This definition gives no opportunity for any confusion. There is therefore no further specifications needed. On the contrary, the assessment of “fitness for use” and common quality of the product, will be different from one market to another – private label, national brand, away-from-home...Fitness for use is definitely not linked with specific technical criteria (strength, absorption...) but with market conditions, regulated by specific quality specifications (internal) and/or by general technical specifications which are the core of the contract between producers and distributors. Furthermore, fitness for use could also be considered very diversely from one country to another: a specific range of product in Germany would not be accepted in France e.g. Finally, the verification for this criterion is easily made by controlling the compliance to internal quality controls, to external (tender/technical/...) specifications, and checking the grounds for claim.	Accepted
34 0	Section 4.6 pg. 109	Standards for fitness for use	An ISO 9001 certification (or equivalent) would be a way to meet this criterion. The following standards may be suitable for CGP :-NF Q 03-025/ISO 5629 (bending stiffness)-NF EN ISO 1924-2 (tensile strength)	

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
34 1	TR 4.6 Criterion 6: Fitness for use, p.109	All tissue products shall fulfil the following requirements: Slimicides and antimicrobial substances: No growth retardance of micro-organisms according to test method EN 1104 Dyes and optical brighteners: No bleeding according to test method EN 646/648 (level 4 is required). Assessment and verification: The applicant shall provide a declaration of compliance with these requirements, supported by relevant test reports in accordance with standards EN 1104 and EN 646/648.	Tissue products: No restriction to move this Product Safety requirement (current Criterion 5) to Criterion 6 Fitness for use, on condition that this paragraph is clearly identified as additional "safe use requirement" and not "fitness for use".	
34 2	Section 4.6 pg.111	Do you consider EN 646, 648 and 1104 as more appropriate to consider as Fitness for use criteria or should they continue to be grouped under a "Product Safety" criterion?	The standards EN 646, 648 and 1104 should be referred to the criterion of "fitness for use"	



N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
34 3	Section 4.6 pg.111	Are there any other standards that you believe should be considered for the fitness for use aspects of these product groups? And if so, should they be specified in EU Ecolabel criteria	We believe, that appropriate parts of the series of standards ISO 12625 Tissue paper and tissue products should be considered	
34 4	Selected Text 3,6 pg.1 Section 4.6. pg. 111	Q: Do you consider that EN 12281 and 12858 fitness for use requirements for Copying and Graphic Paper or for Newsprint Paper are of direct relevance to EU Ecolabel criteria	Take this criterion away, it is not relevant and have only created problems in the applications. Applicants tell us that the standards are not relevant	

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
34 5	Section 4.7 pg.112	CRITERIA PROPOSAL: The following information shall appear on the product packaging: 'Please minimise use of this paper where possible (e.g. through avoidance and double sided printing), reusing used paper where possible (e.g. as note (e.g. adhesives, labels, tape, laminates etc.) helps to maximise the environmental benefits of recycling'	There is no space for this-There is no sufficient space on the packaging to add anything longer than the current sentence "please collect used paper for recycling"- The message has to be short and the English version has to be understandable in other languages (as we do not always translate "please collect used paper for recycling") The message is too negative-The proposed message is very negative. You are shaming people that buy paper. We should encourage a positive message instead of a doomsday message-Because of such message, the products carrying the EU Ecolabel will look worse for the environment than the products which are not certified. Today's simple recycling message "please collect used paper for recycling" makes the most sense and it is aligned with other consumer products	Accepted
34 6	Section 4.7 pg.112	Information on the packaging	No change is desired, the sentence « Please collect used paper for recycling » should be kept. As for CGP, we do not recommend to add the sentences: « Please minimise use of this paper where possible (e.g. through avoidance and double sided printing), reusing used paper where possible (e.g. as note paper), and finally presenting it for recycling. Remember that minimising contamination (e.g. adhesives, labels, tape, laminates etc.) helps to maximise the environmental benefits of recycling », which could be misunderstood by consumers and could limit the use of Ecolabel products.	Accepted
34 7	Section 4.7 pg.112	Do the revisions/additions seem reasonable?	It seems that education in any form is needed, and the proposed amendment supports education.	Clarification: The primary proposal of the revised text has been withdraw, mainly because of limited space to include the educational message. The revised proposal has been included in TR2
34 8	Section 4.7 pg.112	Do the revisions/additions seem reasonable?	The revision is not needed	Partially accepted: The revised proposal has been included in TR2
34 9	Selected text 4.7 pg.112	Table 46	The message "Please minimise the use of this paper where possible....." should not be written on the product: Ecolabelled papers are more environmentally friendly than other papers where this message is not written.	Accepted
35 0	Section 4.7 pg.112	'Please minimise use of this paper where possible (	The sentence should be revised, it is not relevant to suggest to limit the use of "this" paper. The information could focus on all paper product and not only paper products which bear the EU ecolabel.	Rejected: Sentence refers to EU Ecolabel product

No.	Reference: - section/task -page	Subject of the comment	Comment	Response
35 1	Section 4.7 pg.112	‘Please minimise use of this paper where possible (e.g. through avoidance and double sided printing), reusing used paper where possible (e.g. as note paper), and finally presenting it for recycling. Remember that minimising contamination (e.g. adhesives, labels, tape, laminates etc.) helps to maximise the environmental benefits of recycling’.	The proposed message is very negative. We should encourage a positive message instead of a doomsday message Because of such message, the products carrying the EU Ecolabel will look worse for the environment than the products which are not certified (for which there are no restrictions of use).There is no sufficient space on the packaging to add anything longer than the current sentence “please collect used paper for recycling” as the packaging features on average 7 languages; sometimes up to 13 languages The message has to be short and the English version has to be understandable in other languages as we do not always translate “please collect used paper for recycling “We propose to use a simple recycling message “please collect used paper for recycling”.	Accepted
35 2	Section 4.7. pg. 112	In addition, if recycled fibres are used, the manufacturer shall provide a statement indicating the minimum percentage of recycled fibres next to the EU Ecolabel logo.	Actually this sentence belongs to the tissue criteria and not to C&G paper criteria. It should be deleted in the tissue paper criteria because it does not give any added value. It just confuses the consumer. A logo on a packaging is enough.	Accepted
35 3	Section 4.7. pg. 112	Do the revisions/additions seem reasonable?	Absolutely not. We have already problems with the text "Please collect used paper for recycling". The applicants tell us that there is no place for that.	Revised proposal has been presented
35 4	TR 4.8 Criterion 8: Consumer information (Tissue Paper), p. 113		For readability and credibility, we recommend to keep 2 or 3 general claims maximum. The purpose of such information is to highlight the specific environmental performance of EE products, not to provide a list of what all tissue paper products generally achieve. Avoid the proposed sentence “low water use and waste generation in production” which conveys misleading information to consumers. Furthermore a mandatory statement of the percentage of certified/recycled fibres in the product might cause confusion or even be in contradiction with the FSC and PEFC COC rules.	Accepted

No.	Reference: - section/task -page	Subject of the comment	Comment	Response
35 5	Section 4.8 pg. 113	Information appearing on the EU Ecolabel	Multiplying statements is inconvenient, especially for products displaying multilingual information. The current display of information should not be modified, even if it means making reference to a website for additional information.	Partially accepted: The criterion is proposed as optional
35 6	Section 4.8 pg.113	Q. Only three points can be used in any given label, are the proposed points suitable or do you have any other preferences?	We suggest to keep in the optional box the following sentences :- Uses sustainable fibres- Low greenhouse gas emissions and energy use- Reduced use of hazardous substances To distinguish EU Ecolabel products from the other products on the market it could be indicated some substances mediated which are banned or limited.	Accepted
35 7	Section 4.8 pg.113	3.8Criterion 8: Information appearing on the EU Ecolabel (Copying and graphic paper/Newsprint Paper) or Criterion 8: Consumer information (Tissue Paper)	This criteria shall remain optional, as in most cases there is no sufficient space on the packaging to add such a text box. As stated in the technical report, the claims shall be limited to three (the most persuasive messages make three claims) The proposal to add, next to the Ecolabel, a statement indicating the minimum percentage of recycled fibres and certified fibres is not feasible: when the products are also PEFC/FSC certified, the proposed statement is not in line with the FSC and PEFC certifications standards. For non-certified products, consumers might interpret it as a forest certification claim. Keep three sentences but no mandatory statement of the percentage of certified/recycled fibres in the product as it might cause confusion or even be in contradiction with the FSC and PEFC COC rules.	Accepted
35 8	Section 4.8. pg. 113	Criterion 8: Information appearing on the EU Ecolabel (Copying and graphic paper/Newsprint Paper) or Criterion 8: Consumer information (Tissue Paper)	No license holders uses these boxes	
35 9	Section 5.1 pg.114	Water consumption	The management of this resource should be demonstrated via an ISO 14001 system (or equivalent).	Following feedback received the proposed criterion has been withdraw

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
36 0	Section 5.1. Water consumption control Pg.114	Q. Is it more appropriate to target the minimisation of water consumption or the minimisation of wastewater discharge volume? Please explain why either way?	If you minimize the water usage you also minimize the waste water discharge volume, but not the other way if you only minimize the waste water volume. Although industry claims to be very efficient in the use of water, there are significant differences on the performance achieved since some use 100 m3 of water per ton of produced pulp and others 10 m3. Technical solutions to minimize water usage might not be adopted that easily if the price of water is low.	Following feedback received the proposed criterion has been withdraw
36 1	Section 5.1. Water consumption controlPg.114	Q. Do you think a benchmark could or should be set for water consumption (or wastewater effluent discharge)?	Yes, maximum of 30 m3/ADt. According to the EKONO benchmark study this can be reached by 30% of the sulphate mills. Introducing TCF bleaching will lower the water usage to below 10 m3/ADt.	Following feedback received the proposed criterion has been withdraw
36 2	Section 5.1. Water consumption controlPg.114	Q. Would market pulp suppliers be willing or able to provide specific water consumption data from their pulp?	NGOs hope that this will be the case as transparency is needed. The EKONO study can provide references for water consumption.	Following feedback received the proposed criterion has been withdraw
36 3	Section 5.1. Water consumption controlPg.114	Q. Should a tiered approach be taken, which would introduce more stringent measures for mills located in geographical regions of higher water scarcity/water stress? If so, what system should be used to define levels of water scarcity/water stress?	All mills should have the same approach as clean water should be used with care.	Accepted: The EU Ecolabel should not benefit any specific geographical region
36 4	Section 5.1 pg. 114	water consumption	Finland is positive to the proposal for a new criterion concerning water consumption.	Following feedback received the proposed criterion has been withdraw

No.	Reference: - section/task -page	Subject of the comment	Comment	Response
36 5	Selected Text 4,1 pg.. 114 Section 5.1 pg.114	Water consumption control	Water consumption is not a hot spot. If a requirement is developed it should be a qualitative approach and not a quantitative one.	Following feedback received the proposed criterion has been withdraw
36 6	TR Section 5.1. Water consumption control, p. 114		We don't support this new criterion. Water consumption is a local issue and strongly site related. Water reduction has also few drawbacks, which could have an impact on the environment	Following feedback received the proposed criterion has been withdraw
36 7	Section 5.1 pg.118	Q. Is it more appropriate to target the minimisation of water consumption or the minimisation of wastewater discharge volume? Please explain why either way?	The volume of wastewater is depending directly from the amount of fresh water. There are currently existing BAT for the waste water - so this value should be taken into the Ecolabel-discussion. The fresh water consumption is then also (indirectly) covered by the Ecolabel.	Following feedback received the proposed criterion has been withdraw
36 8	Section 5.1 pg.118	Q. Do you think a benchmark could or should be set for water consumption (or wastewater effluent discharge)?	There are already waste water targets for many kind of paper mills written down in the BAT-list. To minimize the work the existing BAT-targets should be also included in the Ecolabel. Caused in the many kind of paper grades (especially viewing on the brightness of the paper) creating a "simple" benchmark for single paper grades is not practicable.	Following feedback received the proposed criterion has been withdraw
36 9	Section 5.1 pg.118	Do you think a benchmark could or should be set for water consumption (or wastewater effluent discharge)?	No, I don't. We will have problems to find companies willing to provide data	Following feedback received the proposed criterion has been withdraw
37 0	Section 5.1 pg.118	Would market pulp suppliers be willing or able to provide specific water consumption data from their pulp	No, rather not	Following feedback received the proposed criterion has been withdraw

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
37 1	Section 5.1 pg.118	4.1 Water consumption control	We disagree with the proposal to add a new criterion. We urges to keep the criteria simple and limited to most relevant environmental aspects. Furthermore, water consumption is a local issue and strongly site specific. Water reduction has also few drawbacks, which could have an impact on the environment. Furthermore, the application to Ecolabel has not to be used as a way to collect data for future revisions. This criterion could be satisfied by a general criterion asking for an environmental management system including water management procedures. Any request of detailed information on potential improvements, plans and data on specific water consumption should be avoided New text:(a) Onsite water and waste management This requirement shall apply to all relevant pulp and paper mills that are under the management of the applicant. A report demonstrating that water and wastes are part of a management plan in the mill shall be provided. Assessment and verification: the applicant shall provide a declaration of compliance with the criterion. Where appropriate, EMS (e.g. ISO14001 or EMAS) procedures or permit information (e.g. under Directive 2015/75/EU on industrial emissions – formerly Integrated Pollution Prevention and Control) can be used as evidence.	Following feedback received the proposed criterion has been withdraw
37 2	Section 5.1 pg.118	Q. Is it more appropriate to target the minimisation of water consumption or the minimisation of wastewater discharge volume? Please explain why either way?	It is not appropriate to address water consumption nor wastewater discharge in Ecolabel. It is in many cases based on local ecosystems needs	Following feedback received the proposed criterion has been withdraw
37 3	Section 5.1 pg.118	Q. Do you think a benchmark could or should be set for water consumption (or wastewater effluent discharge)?	It is not appropriate to address water consumption nor wastewater discharge in Ecolabel. It is in many cases based on local ecosystems needs	Following feedback received the proposed criterion has been withdraw
37 4	Section 5.1 pg.118	Q. Would market pulp suppliers be willing or able to provide specific water consumption data from their pulp?	No. We urge the need to keep the criteria simple to apply and to verify.	Following feedback received the proposed criterion has been withdraw

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
37 5	Section 5.1 pg.118	Q. Should a tiered approach be taken, which would introduce more stringent measures for mills located in geographical regions of higher water scarcity/water stress? If so, what system should be used to define levels of water scarcity/water stress?	No. We urge the need to keep the criteria simple to apply and to verify. We also stress the need to work for a fine tuning of the criteria without major changes. Furthermore, actual water scarcity assessment tools are not reliable enough and the results could vary during the time.	Following feedback received the proposed criterion has been withdraw
37 6	Section 5.1. pg. 114 - 118		Water scarcity/water stress is geographically dependent. Demand environmental management system including water management. ISO 14001 or EMAS certificate can be used as verification. By asking for an environmental management system instead of adding a new criterion it is secured that mills situated in areas where water is limited will have to have goals and improvement for water consumption as environmental management systems demand that for important environmental aspects. Mills situated where there is no water scarcity will work with other aspects more important for them which will benefit the environment better.	Following feedback received the proposed criterion has been withdraw



No.	Reference: - section/task -page	Subject of the comment	Comment	Response
37 7	Section 5.2 pg.120	Q: If EDTA / DTPA were to be permitted, what conditions should be applied? For example, certain wastewater treatment processes, effluent testing (using which method)?	<p>At the moment the effectiveness of alternative chelates is not at the level of EDTA/DTPA. Generally the chelating strength of the listed alternative substances does not suffice for the challenging conditions in a pulp &amp; paper mill. Additionally, the production of EDDS produces toxic waste. Chelating agents are essential chemicals and a prerequisite in both mechanical and chemical pulping (not for recycled fibres). The technology used today for bleaching, both ECF and TCF, is dependent on chelating agents. Around 98 % of the amount used in the process goes to the water phase. It is eliminated in the production process (20-40 %), by biological treatment (50- 95 %) and by photochemical degradation. The degree of degradability depends on the type of process and the type of biological treatment plant. A risk assessment, performed by an independent research institute, and based on calculations regarding content of DTPA and EDTA in recipient waters together with results from reproductive toxicity tests shows that a volume of 700 L of water in immediate proximity to a mill effluent has to be ingested in order to pose any risk to an unborn child. (DTPA has been classified as H361d according to CLP regulation and R63 according to EU Dir 67/54/EEG) Studies on aqua-toxicity of DTPA and EDTA show no observed effects from the low amounts emitted to recipients from pulp and paper mills in Sweden. Calculations based on DTPA content in paper-based food packaging (paper mug) regarding DTPA intake through hot beverage consumption show that such exposure is far below levels supposed to present any risks to an unborn child. A worst scenario content shows that 2350 mugs of coffee have to be ingested to pose any risk. Thus, the risk by using the EDTA and DTPA is negligible. No technically feasible alternatives to EDTA and DTPA are available today. Chelating agents are not completely exchangeable with each other. By using chelating agents the production process is resource-efficient and optimized in a holistic perspective. The total environmental impact is lower than without the chemicals. The economic consequences of ban of DTPA is estimated to be between 5 and 10 billion SEK for the Swedish pulp and paper sector According to BAT conclusions on organic chelating agents: BAT is a combination of measures- monitoring of amounts emitted to the environment- optimising the production process in order to reduce the use and emissions of chelating agents (not applicable if more than 70% is eliminated in the process)- prioritize the use of biodegradable chelating agents and continuous reduction of non-degradable products (applicability depends on availability of chemicals for substitution)Komplexbildare och miljömärkning av pappersprodukterSSVL rapport 2015-10-14IVL Swedish Environmental Research Institute Nr B 2244 (in Swedish, summary in English)Delete this criterion</p>	Accepted
37 8	Section 5.2 pg. 119		<p>All of the mentioned alternatives are well know no the chemical suppliers and to us. We have been running trials at our mills for a long period of time, but none of the biodegradable products have demonstrated as good chelating capacity as EDTA/DTPA. We want to highlight following details: EDTA is fast biodegradable if the pH &gt; 8, on which AkzoNobel has a patent EDDS production produces toxic waste even though the end product itself would be better biodegradable than EDTA</p>	Accepted

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
37 9	Section 5.2 pg.120	Some key questions need to be addressed before deciding how to proceed on this matter, which are listed below:	<p>At the moment the effectiveness of alternative chelates is not at the level of EDTA/DTPA. Generally the chelating strength of the listed alternative substances does not suffice for the challenging conditions in a pulp &amp; paper mill. Additionally, the production of EDDS produces toxic waste. Chelating agents are essential chemicals and a prerequisite in both mechanical and chemical pulping (not for recycled fibres). The technology used today for bleaching, both ECF and TCF, is dependent on chelating agents. Around 98 % of the amount used in the process goes to the water phase. It is eliminated in the production process (20-40 %), by biological treatment (50- 95 %) and by photochemical degradation. The degree of degradability depends on the type of process and the type of biological treatment plant. A risk assessment, performed by an independent research institute, and based on calculations regarding content of DTPA and EDTA in recipient waters together with results from reproductive toxicity tests shows that a volume of 700 L of water in immediate proximity to a mill effluent has to be ingested in order to pose any risk to an unborn child. (DTPA has been classified as H361d according to CLP regulation and R63 according to EU Dir 67/54/EEG) Studies on aqua-toxicity of DTPA and EDTA show no observed effects from the low amounts emitted to recipients from pulp and paper mills in Sweden. Calculations based on DTPA content in paper-based food packaging (paper mug) regarding DTPA intake through hot beverage consumption show that such exposure is far below levels supposed to present any risks to an unborn child. A worst scenario content shows that 2350 mugs of coffee have to be ingested to pose any risk. Thus, the risk by using the EDTA and DTPA is negligible. No technically feasible alternatives to EDTA and DTPA are available today. Chelating agents are not completely exchangeable with each other. By using chelating agents the production process is resource-efficient and optimized in a holistic perspective. The total environmental impact is lower than without the chemicals. The economic consequences of ban of DTPA is estimated to be between 5 and 10 billion SEK for the Swedish pulp and paper sector According to BAT conclusions on organic chelating agents: BAT is a combination of measures- monitoring of amounts emitted to the environment- optimising the production process in order to reduce the use and emissions of chelating agents (not applicable if more than 70% is eliminated in the process)- prioritize the use of biodegradable chelating agents and continuous reduction of non-degradable products (applicability depends on availability of chemicals for substitution)Komplexbildare och miljömärkning av pappersprodukterSSVL rapport 2015-10-14IVL Swedish Environmental Research Institute Nr B 2244 (in Swedish, summary in English)Delete this criterion</p>	Accepted

No.	Reference: - section/task -page	Subject of the comment	Comment	Response
380	Section 5.2 pg.120	Q: Should chelating/complexing agents be restricted like surfactants on the basis of their biodegradability?	<p>At the moment the effectiveness of alternative chelates is not at the level of EDTA/DTPA. Generally the chelating strength of the listed alternative substances does not suffice for the challenging conditions in a pulp &amp; paper mill. Additionally, the production of EDDS produces toxic waste. Chelating agents are essential chemicals and a prerequisite in both mechanical and chemical pulping (not for recycled fibres). The technology used today for bleaching, both ECF and TCF, is dependent on chelating agents. Around 98 % of the amount used in the process goes to the water phase. It is eliminated in the production process (20-40 %), by biological treatment (50- 95 %) and by photochemical degradation. The degree of degradability depends on the type of process and the type of biological treatment plant. A risk assessment, performed by an independent research institute, and based on calculations regarding content of DTPA and EDTA in recipient waters together with results from reproductive toxicity tests shows that a volume of 700 L of water in immediate proximity to a mill effluent has to be ingested in order to pose any risk to an unborn child. (DTPA has been classified as H361d according to CLP regulation and R63 according to EU Dir 67/54/EEG) Studies on aqua-toxicity of DTPA and EDTA show no observed effects from the low amounts emitted to recipients from pulp and paper mills in Sweden. Calculations based on DTPA content in paper-based food packaging (paper mug) regarding DTPA intake through hot beverage consumption show that such exposure is far below levels supposed to present any risks to an unborn child. A worst scenario content shows that 2350 mugs of coffee have to be ingested to pose any risk. Thus, the risk by using the EDTA and DTPA is negligible. No technically feasible alternatives to EDTA and DTPA are available today. Chelating agents are not completely exchangeable with each other. By using chelating agents the production process is resource-efficient and optimized in a holistic perspective. The total environmental impact is lower than without the chemicals. The economic consequences of ban of DTPA is estimated to be between 5 and 10 billion SEK for the Swedish pulp and paper sector According to BAT conclusions on organic chelating agents: BAT is a combination of measures- monitoring of amounts emitted to the environment- optimising the production process in order to reduce the use and emissions of chelating agents (not applicable if more than 70% is eliminated in the process)- prioritize the use of biodegradable chelating agents and continuous reduction of non-degradable products (applicability depends on availability of chemicals for substitution)Komplexbildare och miljömärkning av pappersprodukterSSVL rapport 2015-10-14IVL Swedish Environmental Research Institute Nr B 2244 (in Swedish, summary in English&gt;Delete this criterion</p>	Accepted

No.	Reference: - section/task -page	Subject of the comment	Comment	Response
38 1	Section 5.2 pg.120	Q: What chemicals are used by Nordic Swan and Blue Angel licence holders as alternatives to EDTA/DTPA?	<p>At the moment the effectiveness of alternative chelates is not at the level of EDTA/DTPA. Generally the chelating strength of the listed alternative substances does not suffice for the challenging conditions in a pulp &amp; paper mill. Additionally, the production of EDDS produces toxic waste. Chelating agents are essential chemicals and a prerequisite in both mechanical and chemical pulping (not for recycled fibres). The technology used today for bleaching, both ECF and TCF, is dependent on chelating agents. Around 98 % of the amount used in the process goes to the water phase. It is eliminated in the production process (20-40 %), by biological treatment (50- 95 %) and by photochemical degradation. The degree of degradability depends on the type of process and the type of biological treatment plant. A risk assessment, performed by an independent research institute, and based on calculations regarding content of DTPA and EDTA in recipient waters together with results from reproductive toxicity tests shows that a volume of 700 L of water in immediate proximity to a mill effluent has to be ingested in order to pose any risk to an unborn child. (DTPA has been classified as H361d according to CLP regulation and R63 according to EU Dir 67/54/EEG) Studies on aqua-toxicity of DTPA and EDTA show no observed effects from the low amounts emitted to recipients from pulp and paper mills in Sweden. Calculations based on DTPA content in paper-based food packaging (paper mug) regarding DTPA intake through hot beverage consumption show that such exposure is far below levels supposed to present any risks to an unborn child. A worst scenario content shows that 2350 mugs of coffee have to be ingested to pose any risk. Thus, the risk by using the EDTA and DTPA is negligible. No technically feasible alternatives to EDTA and DTPA are available today. Chelating agents are not completely exchangeable with each other. By using chelating agents the production process is resource-efficient and optimized in a holistic perspective. The total environmental impact is lower than without the chemicals. The economic consequences of ban of DTPA is estimated to be between 5 and 10 billion SEK for the Swedish pulp and paper sector According to BAT conclusions on organic chelating agents: BAT is a combination of measures- monitoring of amounts emitted to the environment- optimising the production process in order to reduce the use and emissions of chelating agents (not applicable if more than 70% is eliminated in the process)- prioritize the use of biodegradable chelating agents and continuous reduction of non-degradable products (applicability depends on availability of chemicals for substitution)Komplexbildare och miljömärkning av pappersprodukterSSVL rapport 2015-10-14IVL Swedish Environmental Research Institute Nr B 2244 (in Swedish, summary in English)Delete this criterion</p>	Accepted

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
38 2	Section 5.2 pg.120	Q: Is there any existing information concerning the overall environmental profile of these alternative chemicals?	<p>At the moment the effectiveness of alternative chelates is not at the level of EDTA/DTPA. Generally the chelating strength of the listed alternative substances does not suffice for the challenging conditions in a pulp &amp; paper mill. Additionally, the production of EDDS produces toxic waste. Chelating agents are essential chemicals and a prerequisite in both mechanical and chemical pulping (not for recycled fibres). The technology used today for bleaching, both ECF and TCF, is dependent on chelating agents. Around 98 % of the amount used in the process goes to the water phase. It is eliminated in the production process (20-40 %), by biological treatment (50- 95 %) and by photochemical degradation. The degree of degradability depends on the type of process and the type of biological treatment plant. A risk assessment, performed by an independent research institute, and based on calculations regarding content of DTPA and EDTA in recipient waters together with results from reproductive toxicity tests shows that a volume of 700 L of water in immediate proximity to a mill effluent has to be ingested in order to pose any risk to an unborn child. (DTPA has been classified as H361d according to CLP regulation and R63 according to EU Dir 67/54/EEG) Studies on aqua-toxicity of DTPA and EDTA show no observed effects from the low amounts emitted to recipients from pulp and paper mills in Sweden. Calculations based on DTPA content in paper-based food packaging (paper mug) regarding DTPA intake through hot beverage consumption show that such exposure is far below levels supposed to present any risks to an unborn child. A worst scenario content shows that 2350 mugs of coffee have to be ingested to pose any risk. Thus, the risk by using the EDTA and DTPA is negligible. No technically feasible alternatives to EDTA and DTPA are available today. Chelating agents are not completely exchangeable with each other. By using chelating agents the production process is resource-efficient and optimized in a holistic perspective. The total environmental impact is lower than without the chemicals. The economic consequences of ban of DTPA is estimated to be between 5 and 10 billion SEK for the Swedish pulp and paper sector According to BAT conclusions on organic chelating agents: BAT is a combination of measures- monitoring of amounts emitted to the environment- optimising the production process in order to reduce the use and emissions of chelating agents (not applicable if more than 70% is eliminated in the process)- prioritize the use of biodegradable chelating agents and continuous reduction of non-degradable products (applicability depends on availability of chemicals for substitution)Komplexbildare och miljömärkning av pappersprodukterSSVL rapport 2015-10-14IVL Swedish Environmental Research Institute Nr B 2244 (in Swedish, summary in English&gt;Delete this criterion</p>	Accepted
38 3	Section 5.2. pg. 120	What chemicals are used by Nordic Swan and Blue Angel licence holders as alternatives to EDTA/DTPA?	We have not seen any alternatives to EDTA/DTPA in Nordic Ecolabel	

No.	Reference: - section/task -page	Subject of the comment	Comment	Response
38 4	Section 5.2. pg. 120	Should chelating/complexing agents be restricted like surfactants on the basis of their biodegradability?	DTPA was banned in NS due to its classification after last revision. However, some producers claimed that that they could not use EDTA because it didn't work under their process conditions and that there were no alternatives available on the market. NS investigated this and finally there was a derogation developed for DTPA that allows the use of it if the producers could show that they can't change it due to the technical reasons. This has been a very complex process and the question is if the use of EDTA is better than DTPA. Our proposal is that until there are real alternatives (better for the environment) available on the market, allow the use of both EDTA and DTPA but ask for a plan for reducing the use of them.	Accepted
38 5	Section 5.2. pg. 119 - 120		As well TCF as ECF bleaching is dependent on EDTA/DTPA. Keep EDTA and DTPA permitted by deleting the criteria. A risk assessment, performed by the independent research institute IVL, shows no observed effects from the low amounts emitted to recipients from pulp and paper mills in Sweden (see report in Swedish, summary available also in English: <a href="http://www.ivl.se/download/18.343dc99d14e8bb0f58b8540/1455713814403/B2245.pdf">http://www.ivl.se/download/18.343dc99d14e8bb0f58b8540/1455713814403/B2245.pdf</a> ).	Accepted
38 6	Section 5.3 pg. 121		The statement regarding the toxicology of OBA refers to FWA-1, an OBA which is not used for the manufacture of paper products but used in detergents. The generalised statement that most OBAs are irritants and classified is not valid for the paper industry in general. The main products used in the manufacture of paper are not classified. Safety data sheets are available for evidence.	Accepted

No.	Reference: - section/task -page	Subject of the comment	Comment	Response
38 7	Section 5.3 pg. 121		<p>OBA's in the paper industry / EU Ecolabel criteria draft 1) Database for EU Ecolabel criteria With regard to EU Ecolabel criteria, the basis for the evaluation of OBA's in terms of a) classification and labelling (CLP) b) toxicity c) environmental impact should be the data set that the ECHA = European Chemicals Agency is using. Almost all OBA's used in the paper industry have been REACH-registered during the 2010 and 2013 registration deadlines. The corresponding data have been collected / generated during the REACH registration process in recent years and are representing the latest status of information. All studies that are available to date have been taken into account for the evaluation and classification of OBA's, as present in the current REACH dossiers. A lot of the REACH and CLP data are nowadays publicly available through ECHA's website: <a href="http://echa.europa.eu/information-on-chemicals">http://echa.europa.eu/information-on-chemicals</a> where data for a certain OBA can be searched by e.g. entering its CAS number or EC number. Another source of information are the MSDS'ses from OBA manufacturers according to EU MSDS standards and applicable laws.2) Draft "Technical Report 1.0" The draft "Technical report 1.0 – Draft criteria proposal for the revision of ecological criteria" states on page 121: However, the cited OBA "Fluorescent Brightener FWA-1" is not a relevant product for use in the paper industry. It is practically only used in the detergent industry. The relevant paper OBA's need to be considered with their toxicological data that are present in their related REACH dossiers and MSDS'ses. It is also stated that "most OBA's are irritants...and eco-toxic in water. Some also have risk phrases H302 and H314." Blankophor GmbH cannot follow this statement, at least not for most paper OBA's. Some available paper OBA's are classified as irritant, but these represent volume wise a quite small portion of the total paper OBA market. However, the majority of the common paper OBA's are not classified at all. Examples for common paper OBA's, representing a major portion of OBA's used in the European paper industry, are the following: - disulpho type OBA, e.g. BLANKOPHOR DS liq. - "standard" tetrasulpho type OBA, e.g. BLANKOPHOR P liq. 01 - "advanced" tetrasulpho type OBA, e.g. BLANKOPHOR NC liq. - hexasulpho type OBA, e.g. BLANKOPHOR UWS liq. The attached data sheets show that these paper OBA's are not classified at all, and thus also not according to the following, above mentioned criteria: -irritant -toxic or harmful to aquatic life -labelling with H risk phrases H302 or H314 3) Environmental fate of paper OBA's The REACH registration process also includes a risk assessment, considering the environmental fate of paper OBA's. EU Ecolabel assessment should be based on the same considerations and the same data set. Very generally spoken, the major portion of the used paper OBA will be fixed on the paper fibre and thus will not enter the environment (air, soil or water). The OBA that is not fixed on the fibre will to a large extent undergo the following pathway: a) emission to air is neglectable, as all common paper OBA's have a very low vapour pressure. Decomposition does not occur given the conditions during use in paper mills. b) Virtually all paper mills in Europe are connected to a waste water treatment plant (WWTP). The OBA in a paper mill's waste water will to a large extent adhere to the sludge in the WWTP and will then be eliminated or incinerated. Thus the major portion of OBA that is not fixed on the paper fibre will not end up in the environmental compartments soil or air. This has to be considered when discussing potential effect of certain OBA's to aquatic organisms. 4) Current assessment under other Ecolabels, e.g. Blue Angel / Nordic Swan All above mentioned OBA's under 2) comply with the Nordic Swan regulations, two of them also comply with the regulations of the "Blauer Engel" for producing SC, LWC, MWC and HWC papers. Generally it should be considered that different Ecolabels may have different targets. The "Blauer Engel" label is e.g. directed to environmentally friendly products, this may be achieved in the case of paper through the use of recycled fibres. 5) General ecological benefits of OBA use The use of OBA's to reach a certain desired whiteness target needs to be considered together with the other measures to achieve paper</p>	Accepted

No.	Reference: - section/task -page	Subject of the comment	Comment	Response
388	Section 5.3 pg.121	OBA	OBA should only be restricted if they carry certain risk phrases and not as a general rule.	Accepted
389	Section 5.3 pg. 121	Discussion points - questions in red text	OBAs restrictions implies whiteness decrease. This doesn't seem to respond to some national market's needs for copy papers.	
390	Section 5.3 pg.121	Q. If so, should restrictions be conditional depending on the grade of paper product?	Restrictions should be set depending on the grade of the product. A similar approach to the Blue Angel label could be developed.	
391	Section 5.3 pg.121		We have evidence that shows the OBA used in paper-making are of low risk to health and the environment. These substances are well studied, and because they are manufactured in such large volumes they have undergone stringent testing under the highest tonnage bands of REACH. I have attached a justification report, if you require any more detail then please contact us. Do not restrict the use of OBA for which the stakeholder can show evidence via test data of the low risk to health and the environment. OBA are used to improve the aesthetics of the finished paper and can reduce or replace the more hazardous bleaching stages	Accepted
392	Section 5.3. pg.121	Should some OBAs be restricted under the EU Ecolabel where they carry certain risk phrases (e.g. around PBT and vPvB)?	Classified OBAs will be banned by the criterion on hazardous substances	Accepted



N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
39 3	Section 6 pg.122	EDTA/DTPA and Optical Brightening Agents are proposed.	Possible restriction on some Optical Brightening Agents: OBAs at some level are added to most printing papers today, including offset, digital, and home & office copier varieties of paper. Both the paper brightness and whiteness can be increased with the addition of OBA. It has also been reported that the overall environmental impact of using OBA might be better than peroxide for a certain level of brightness gain of pulps. High brightness and whiteness can impart the sensation of cleanliness and help increase the legibility of the text due to the contrast of the paper with the ink. Using OBAs in the yellow ink is a common strategy with newspaper printers as a way to add brightness to imagery and compensate for the poor whiteness of newspaper stock. European countries dedicated entities permits usage of all 3 type of Optical Brighteners – tetrasulpho, disulpho and hexasulpho in food contact paper because of their safety. Almost all OBAs used in the paper industry have been REACH-registered. The most common and biggest paper OBAs are the following: - disulpho type OBA. - “standard” tetrasulpho type OBA.- “advanced” tetrasulpho type OBA.- hexasulpho type OBA.All these paper OBAs are not classified at all, and thus also not according to the following criteria:-irritant-toxic or harmful to aquatic life-no H risk phrases at all The REACH registration process also includes a risk assessment, considering the environmental fate of paper OBA's. Very generally, the major portion of the used OBA will be fixed on the paper fibre and thus will not enter the environment (air, soil or water).Not restricted the use of OBAsThere is already a specific criteria for chemical substances.	Accepted
39 4	Whole document	Draft criteria proposal for the revision of ecological criteria	Whole document. In the document sometimes it is used the wording “recovered fibre” while in other parts it is used “recycled fibre. We suggest to harmonize this wording To harmonize the wording. A definition could also be included.	
39 5	Whole document	General comment	Any change, however minor, to the criteria will require time to be implemented. This must be taken into account to identify changes that could be implemented within the time limits allowed to manufacturers. Feedback from license holders shows that a significant change could require a 2-year process on industrial sites (works duration, authorisation, budgets, and production schedule).	Accepted
39 6	Whole document	General comment	We want consumers to still have the choice, after the revision, to buy Ecolabel products with reduced environmental impact. As a consequence, we recommend to take into account manufacturers' feedback to set thresholds within acceptable levels. Our license holders have indeed expressed deep concern about a significant lowering of thresholds.	Accepted

No.	Reference: - section/task -page	Subject of the comment	Comment	Response
397	Whole document		Denmark suggests to keep the scope for the paper groups as open as possible. Any limitations shall be made on how the ecolabelled paper can be used (e.g... for packaging or envelopes), and this shall be done in the other criteria documents like Converted paper products. If a final product can be ecolabelled in other product groups then the logo and reference to the ecolabel shall not be used on the paper. If used in areas where no ecolabel requirements are defined, it shall be possible to identify the ecolabelled paper by license number but not the logo. In regards to Tissue products Denmark can support the clarification to include other products like napkins. But we suggest not to include all of the definition from ISO 12625 – The part to include coloured, printed and fragranced paper is too detailed and will also make a discussion on whether or not to include fragranced products difficult, if this is already included in the scope.	
398	Whole document		We support that JRC look into how pulps can be labelled or can be identified by the paper producer. We see great opportunities for such a solution. We think it would be helpful if pulps can be identified by producers. An alternative could be to make an appendix in the UM to enable pulp producer an easy way to find the data and an easy way to pass on the needed information to more than one CB or paper producer	
399	Whole document		A major issue for the ee holders is the transitional period required to comply with revised criteria. We strongly recommend to extend this period to 2 years.in addition, the recommend to provide, at the same time, the user manual and the revised decision.	To be further discussed
400	General Comment Whole document	Processes of recycled fibre processing are not reflected in detail	Because of the history of the European Ecolabel, following the structure of the Nordic Ecolabel originally coming from the Scandinavian countries, the existing criteria do reflect very well the processes used for the production of virgin pulp and paper from wood and the combined environmental performance. Unfortunately, this is not the case for the recycled fibre processing; there are quite a lot of different processes and circumstances that should be reflected in the criteria with more care and detail. The BREF chapter 6 is describing the structure of the RCF sector very well. One huge advantage of using RCF is that the emission and resource intensive step of producing virgin pulp (Kraft, Sulphite or TMP) is being avoided completely. In a comparison of ecological systems paper products made from recovered paper do much better than paper products made from virgin fibres using wood as a source of fibrous raw materials in terms of consumption of resources, wastewater load, water and energy consumption – while still maintaining a comparable level of product serviceability. RCF should get some kind of bonus in the emission matrix calculation. The emission reference values for RFC based mills seem to be very tight on a very low level compared to virgin pulp production. Please engage an expert for recycled fibre processing to recheck the proposed emission levels for RCF because they might be too tight for some RCF paper product groups within the scope of those criteria. For RCF mills almost all mills are integrated, fuel mix is different, emissions level are different for different Paper products like graphic paper with deinking or without deinking, tissue paper need very careful preparation of fibres compared to paper products based on virgin fibres.	Accepted

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
40 1	General Comment Whole document	Mandatory Recovered fibre content for tissue	The huge environmental benefit of the use of RCF for the production should be reflected somehow in the criteria. Even though acknowledging that the Scandinavian countries do not have as much RCF as the countries in central Europe... and of course, we do need some input of virgin fibre into the European paper cycle (about 20%)... The use of recycled fibres, especially paper from households and commercial collections, helps to save resources and to reduce the waste load. It also avoids the environmental impact usually resulting from the production of pulp and wood pulp. In a comparison of ecological systems paper products made from recovered paper are much better than paper products made from virgin fibres using wood as a source of fibrous raw materials in terms of consumption of resources, wastewater load, water and energy consumption – while still maintaining a comparable level of product serviceability. Tissue papers are waste by definition -- since there is no recycling after use, fibres used for production are lost for the recycling cycle. Therefore the use of a high share of recycled fibre for the production of tissue paper (> 70%) should get a clear preference in the EU ecolabel. There has to be some kind of benefit. If the use of RCF is not possible because of the lack of RCF fibres (e.g. in Nordic countries) 100% of virgin fibre should be required to come from sustainable managed forests. For newsprint the required RCF content should be 90 %, since the average RCF is not possible because of the lack of RCF fibres (e.g. in Nordic countries) 90% of virgin fibre should be required to come from sustainable managed forests.	
40 2	general comment Whole document	Level of ambition of emission data in comparison with the level of BAT	In general, we agree with the proposed level of ambition of the proposed reference values for emissions, just recheck on some of the RCF values. We just want to point out that the BAT AELs in the BREF conclusions are the legal frame for all the mills within the EU. Emission limit values have to be set in a way that the installations perform within the range of those BAT-AEL ranges. Since the Ecolabel wants to cover the upper 20 % of the market, the reference values should significantly be below the BAT-AELs. Maybe cover 50 to 70% of the mills for each criteria. There might be technical reasons for some exemptions. Like COD for integrated RCF mills producing tissue paper... But that has to be technically justified very careful. Here RCF should not be discriminated	Accepted
40 3	General Comment Whole document	Questionnaire for process related data	If there is really a need to create a new questionnaire to collect data please look at the questionnaires used for the BREF processes as a possible basis. Maybe ask the companies if you may use the data they were sending for the BREF data. To get data on energy efficiency please check the study we have prepared for the BREF process containing also a format for a questionnaire for energy data	Accepted
40 4	General Comment Whole document	Fragranced coloured paper	Should not be included, because it is an additional environmental burden without fulfilling any function	
40 5	ENV-16-121 Whole document		Holmen Paper support CEPI comments	Accepted
40 6	ENV-16-121 Whole document		We agree with the proposed definition of sustainable fibres, “being considered as virgin fibres sourced from sustainably managed forests or fibres from recovered paper.	Accepted
40 7	Whole Document		COPACEL supports all comments made by CEPI	Accepted

N o.	Reference: - section/task -page	Subject of the comment	Comment	Response
40 8	Whole Document		As mentioned during the 1st AHWG, the review of EU Ecolabel criteria should target the hot-spots in the life cycle of the paper products. There is no effective consideration for "hot spots" – which are however the target of a revision process.	
40 9	Whole Document		The market is decreasing for newsprint and copy & graphic paper, this information is to be taken into account for the whole revision process of the Ecolabel criteria. Paper producers will not be able to make significant investments in the copy and graphic and newsprint sector in Europe.	Accepted
41 0	Whole Document		The implementation of the new Pulp and Paper BREF (September 2014) is in progress. Necessary investments to upgrade mills have been already decided. At industrial scale, we can't change emission limit values every two years	Accepted: The emission criteria has been designed to grant additional flexibility
41 1	Whole Document		General comment to recycling paper: the whole document is very strong aligned to virgin fibres, another special focus on recycled/recovered fibres is missing databases in the tables for "recycled pulp" (commercial pulp) as already existing AND another (new) databases for "integrated recycling paper mills" There are many paper mills that are working with recycled fibres. Most of them are (in contrast to "virgin fibre" mills) integrated mills. The document (tables, text) is (mainly) strictly orientated to the use of virgin fibres. In integrated recycling paper mills it is normally not possible to divide e. g. the emissions or usage of fuels in stock preparation and paper production.	Accepted with comment: For integrated mills, due to the difficulties in getting separate emission figures for pulp and paper, if only a combined figure for pulp and paper production is available, the emission values for pulp(s) shall be set to zero and the combined emissions shall be compared against the combined reference values for the relevant pulp and paper production.
41 2	Whole Document		During the whole document does the wording for recycling fibres change between "recycled" and "recovered" "decision for one word for fibres from waste paper	Accepted
41 3	Whole Document		There is a huge difference between integrated virgin fibre plants and integrated RCF-plants. strictly separation between "integrated pulp paper mill" and "integrated recycling paper mill" "To provide marketable paper made from recycled fibres many steps for preparation of the waste paper are necessary (remove non fibrous waste, remove of ink, bleaching). These steps are connected with energy consumptions and no "generation" of renewable fuels during these processes like on virgin fibre pulp mills.	Accepted
41 4	Whole document		In the point of view of the French agency for environment the EU Ecolabel is a reliable and relevant eco-design tool and a strong label to help consumers to identify environment-friendly products. For each product group the criteria should be demanding in an environmental point of view. But during the developing or revising process it is also necessary to take into account the particularities and the constraints of the sector (technical, environmental, economic aspects). Obtain a reliable criteria it is a good thing but it is better if companies apply for the label and if EU Ecolabel products are sold in shops. That is why it is necessary to define requirements which present an environmental improvement and are achievable for the industry.	Accepted

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