

Preliminary stakeholder survey on the upcoming revision of EU Ecolabel criteria for Paper products (Copying and Graphic, Newsprint and Tissue).

Fields marked with * are mandatory.

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Respondent details (personal data will be treated as confidential)

* 1.1 Please state your name

* 1.2 Please add a contact email address

* 1.3 Which of the following options best represents the type of organisation/interests that you represent?

- Buyer / Consumer interests
- EUEB Member / Competent Body
- Government (local, regional or national)
- Industry-across multiple parts of production chain
- Industry-end product side
- Industry-intermediate and processing (i.e. pulp)
- Industry-supply side (i.e. forestry, recovered paper, chemicals)
- Non-Governmental Organisation (NGO)

* 1.4 Has/is your organisation:

- Been actively involved with the EU Ecolabel criteria development process previously for paper-based Product Groups?
- Obtained an EU Ecolabel license for one of these paper products?
- In the process of applying for an EU Ecolabel license for one of these paper products?
- Potentially considering to apply for an EU Ecolabel license in the future for one of these paper products?
- None of the above

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Product groups under revision

- * 2.1 From the list of Product Groups below that are undergoing revision, please select the ones that you are interested in.

- EU Ecolabel criteria for Copying and Graphic Paper
- EU Ecolabel criteria for Newsprint Paper
- EU Ecolabel criteria for Tissue Paper

2.1 EU Ecolabel scope and definition for Copying and Graphic Paper

- * 2.1.1 The **scope** for [EU Ecolabel for Copying and Graphic Paper](#) is as follows:

*"The product group "copying and graphic paper" shall comprise sheets or reels of not converted, unprinted blank paper and not converted boards up to basis weight of 400 g/m². It shall **not** include newsprint paper, thermally sensitive paper, photographic and carbonless paper, packaging and wrapping paper as well as fragranced paper."*

The following **definition** also applies:

"recycled fibres' means fibres diverted from the waste stream during a manufacturing process or generated by households or by commercial, industrial and institutional facilities in their role as end-users of the product, which can no longer be used for their intended purpose. Excluded is reutilisation of materials generated in a process and capable of being reclaimed within the same process that generated it (mill broke - own produced or purchased)."

Should the scope and definition be amended?

- No, the scope and definition are adequate
- Yes, the scope and definition should be amended (reasoning can be added below)
- Yes, the scope and definition should also include newsprint paper (reasoning can be added below)
- No opinion

- 2.1.2 (Optional) Please provide any more detailed comments on proposals for the **scope and definition text for EU Ecolabel Copying and Graphic Paper** here.

2.2 EU Ecolabel scope and definition for Newsprint Paper

- * 2.2.1 The **scope** for [EU Ecolabel for Newsprint Paper](#) is as follows:

"The product group "newsprint paper" shall comprise paper made from pulp and used for printing newspapers and other printed products. The product group "newsprint paper" shall not include copying and graphic paper, thermally sensitive paper, photographic and carbonless

paper, packaging and wrapping paper as well as fragranced paper. ("newsprint paper" means paper mainly used for printing newspapers and made from pulp and/or recovered paper, the weight of which ranges between 40 and 65 g/m²)."

The following **definitions** apply:

"(1) 'newsprint paper' means paper mainly used for printing newspapers and made from pulp and/or recovered paper the weight of which ranges between 40 and 65 g/m²"

"(2) 'recovered fibres' means fibres diverted from the waste stream during a manufacturing process or generated by households or by commercial, industrial and institutional facilities in their role as end-users of the product which can no longer be used for their intended purpose."

Should the scope and definition of newsprint paper be included within that of Copying and Graphic Paper or be changed in any other way?

- No, the scope and definition are adequate
- Yes, the scope and definition should be amended (reasoning can be added below)
- Yes, the scope and definition should be included within that of Copying and Graphic Paper (see reasoning below)
- No opinion

2.2.2 (Optional) Please provide any more detailed comments on proposals for the **scope text for EU Ecolabel Newsprint Paper** here.

2.3 EU Ecolabel scope and definition for EU Ecolabel Tissue Paper

* 2.3.1 The **scope** for **EU Ecolabel for Tissue Paper** is as follows:

"The product group "tissue paper" shall comprise sheets or rolls of tissue paper fit for use for personal hygiene, absorption of liquids and/or cleaning of soiled surfaces. The tissue product consists of creped or embossed paper in one or several plies. The fibre content of the product shall be at least 90%.

The product group shall not comprise any of the following:

- (a) wet wipes and sanitary products*
- (b) tissue products laminated with other materials than tissue paper*
- (c) products as referred to in Directive 76/768/EEC."*

No **definitions** are included.

Should the scope and definition be amended?

- No, the scope and definition are adequate
- Yes, the scope and definition should be amended (reasoning can be added below)
- No opinion

2.3.2 (Optional) Please provide any alternative proposals for the **scope text for EU Ecolabel Tissue Paper** here.

3 Existing EU Ecolabel criteria

3.1 Emissions to water and air.

The criteria for emissions of phosphorus (P), sulfur (S), nitrogen oxides (NO_x) and chemical oxygen demand (COD) are virtually identical for each of the 3 sets of EU Ecolabel criteria. Please state how you agree with the following conditions:

	Strongly Disagree	Disagree	Neutral Opinion	Agree	Strongly Agree
*Criteria set for P, S, NO _x and COD emissions to water and air should be harmonised for the three different Product Groups.	<input type="radio"/>				
*The recent BREF document (2013) and BAT conclusions (2014) should be used as the appropriate ambition level for emissions to water and air of P, S, NO _x and COD?	<input type="radio"/>				
* The flexible scoring system should be maintained - where any single measure (i.e. A, B, C or D) can exceed BREF values by up to 50% (i.e. 1.5) so long as the sum of all emission factors is equal to or better than the BREF values (i.e. A+B+C+D =<4.0).	<input type="radio"/>				
* The following test methods: For COD (ISO 6060, DIN 38409 part 41, NFT 90101, ASTM D 125283, Dr Lange LCK 114, Hack, WTW); For P (EN ISO 6878, APAT IRSA CNR 4110, Dr Lange LCK 349); For NO_x (ISO 11564) and For S (EPA no.8, EPA no.16A, ISO 8754, ISO 351), are still suitable for	<input type="radio"/>				

assessment and verification purposes and do not need to be updated or extended.					
* Compliance with emission limits should be based on average values over a 12 month period. However, for new production lines or modified processes, average data over a 45 day period shall also be accepted.	●	●	●	●	●

3.2 (Optional) If you have any further comments about **emissions to water and air criteria**, please add them here.

*** 3.3 CO2 emissions.**

Do you think CO2 emissions should be linked to pulp type used?

- Should be linked to pulp type (i.e. mechanical, chemical etc.).
- Should continue to be set on a per tonne of paper product basis.
- No opinion.

3.4 Hazardous substances.

The use, restriction and exclusion of hazardous substances is often the most complex issue in EU Ecolabel criteria, but certain measures are locked in via requirements of Articles 6(6) and 6(7) the EU Ecolabel Regulation (EC) No 66/2010. Please state which options best reflect your opinion on the following points:

	Strongly Disagree	Disagree	Neutral Opinion	Agree	Disagree
*Option 1. Only hazardous substances and mixtures that may remain in the final product in concentrations >0.1% weight by weight should be restricted.	●	●	●	●	●
*Option 2. Hazardous substances and mixtures should be restricted based					

on the classification of the substance or mixture, regardless of whether it remains in the final product or not.	<input type="radio"/>				
*Option 3. A combination of Option 1 and 2 should be used.	<input type="radio"/>				

3.5 (Optional) Are there any **hazardous substances/mixtures** that you think should be specifically addressed/restricted/derrogated? If so, please mention why and at what stage(s) they are used.

3.6 Energy Use.

All three sets of EU Ecolabel criteria consider "**Energy Use**". The criteria from 2009 (Tissue Paper) only refers to **electricity** while the criteria from 2011 (Copying and Graphic Paper) and 2012 (Newsprint Paper) refer to both **electricity AND fuel/heat**.

	Strongly Disagree	Disagree	Neutral Opinion	Agree	Strongly Agree
Energy use criteria should include both fuel/heat and electricity consumption for all three sets of criteria (Tissue Paper, Copying & Graphic Paper and Newsprint Paper).	<input type="radio"/>				
If the recent BREF documentation and BAT conclusions cite more stringent limits for energy use, EU Ecolabel criteria on energy use should align with them.	<input type="radio"/>				
Criteria on energy use should be harmonised across the three sets of EU Ecolabel criteria, bringing Tissue Paper into line with Copying & Graphic Paper and Newsprint Paper.	<input type="radio"/>				

3.7 (Optional) Please add any further comments or opinions that you have regarding **energy use** criteria here.

3.8 Sustainable fibre sourcing.

All three sets of EU Ecolabel include a specific requirement for fibres, either recovered, recycled or virgin. Which options best reflect your opinions on the following points related to fibres:

	Strongly Disagree	Agree	Neutral Opinion	Agree	Strongly Agree
In terms of being considered as "sustainable", no distinction should be made between pre-consumer recycled, post-consumer recycled and virgin fibre from sustainably managed forests.	<input type="radio"/>				
The fibre criteria should link directly to well established schemes (i.e. FSC, PEFC).	<input type="radio"/>				
The criterion for sustainably sourced fibres should directly state minimum forestry management principles and traceability requirements to be respected by suppliers.	<input type="radio"/>				
A minimum recycled (pre- or post-consumer) fibre content should be specified for each Product Group.	<input type="radio"/>				
A minimum requirement of 70% sustainable fibres (recycled and/or virgin from sustainable sources) should be set for each Product Group.	<input type="radio"/>				

3.9 (Optional) Please add any further comments or opinions that you have regarding **sustainable fibre criteria** here.

