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# USER'S MANUAL for the application for the EU Ecolabel for the CONVERTED PAPER PRODUCTS





# Attention!

This manual serves only as a guiding document. In any case the legal basis for being awarded the Ecolabel is 'Regulation (EC) no. 66/2010 of 25 November 2009 on the EU Ecolabel' and the 'Commission Decision of 2 May 2014 establishing the ecological criteria for the award of the EU Ecolabel for converted paper products (2014/256/EU).

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# GENERAL INFORMATION

The purpose of this User's Manual is to describe the requirements in form of data and documentation that the applicant has to compile in order to apply for the EU Ecolabel for converted paper product. In addition, this manual describes the requirements for demonstrating continued compliance once the label has been granted.

The basis for the manual is Commission Decision of 2 May 2014 establishing the ecological criteria for the award of the EU Ecolabel to converted paper product (2014/256/EU).

Application forms for the European Union Ecolabel shall be provided at least in two copies (some Member States might ask for more copies) bearing original signatures. The application form will be provided by any of the Competent Bodies responsible for the European Union Ecolabel Scheme. For any information, please get in contact whit the Ecolabel Helpdesk (Ecolabel@biois.com).

#### FOR WHICH PRODUCTS CAN APPLICATIONS BE MADE?

# Certifiable products

The product group 'converted paper products' shall comprise the following products:

- (a) envelopes and paper carrier bags that consist of at least 90 % by weight of paper, paperboard or paper-based substrates;
- (b) stationery paper products that consist of at least 70 % by weight of paper, paperboard or paper based substrates, except for suspension files and folders with metal fastener subcategories.

In the case referred to in point (b), the plastic component cannot exceed 10 % except for ring binders, exercise books, notebooks, diaries, and lever arch files where the plastic weight cannot exceed 13 %. Furthermore, the metal weight cannot exceed 30 g per product except for suspension files, folders with metal fasteners and ring binders where it can be up to 50 g and except for lever arch files, where it can up to 120 g.

**'Converted paper product'** is a paper, paperboard or paper based substrates, either printed or unprinted, generally used to protect, handle or store items and/or notes, for which the converting process is an essential part of the production process, comprising three main categories of products:

- envelopes,
- paper carrier bags and
- stationery paper products.

**'Stationery paper products'** include folders, binders, notebooks, pads, notepads, exercise books, spiral-bound notebook, calendars with covers, diaries and loose-leafs.

'writing paper products' mean yarn-bound and/or glue-bound printed paper products with hard or soft covers and loose leaf papers intended to be written and/or drawn such as notebooks, exercise books, spiral-bound notebook, flipchart, albums, calendars with covers and diaries.

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**'Folders'** mean folding cases or covers for loose papers, such as suspension files, indices and dividers, document wallet, 3-flap folders, and square cut folders.

**'Binders'** are paper-based products consisting of a cover, usually made of board, with rings for holding loose papers together, such as ring binders and lever arch files.

**'Envelopes'** are generally intended to contain a flat object, such as a letter or card. The ones being closed on the short side are called "pockets", the ones closed by a side-flap (on the long side) are called "envelopes".

**'Paper carrier bags'** are paper-based products used for the handling/transportation of goods. Paper carrier bag can be offered or sold next to the pay-desk or sold alone as a product on its own. Paper carrier bags is designed to be open and to be filled either at the point of purchase or afterwards so that consumers understand the validity of the Eco-label for the paper carrier bag, and not for the goods added.

**'Converting process'** means a process whereby a material is processed into a converted paper product. This process can include:

- printing process,
- coating process,
- finishing process.

**'Printing process'** means a process whereby a printing material is processed into a printed paper product. Printing includes pre-press, press, and post-press operations.

**'Coating process'** means a process whereby varnishes, foils and laminates material is processed into a paper, paperboard, cardboard or board.

**'Finishing process'** means folding, stamping and cutting or assembling, using glue, binding, yarn-binding.

Converted paper products are mainly made of paper and/or paperboard and/or board, called the substrates. These substrates are then converted into converted paper products. The substrates refer to two sorts:

- **'Board substrate'**: means paperboard, cardboard or board, unprinted and not converted, with a basis weight higher than 400 g/m<sup>2</sup>;
- **'Paper substrate'** means paper sheets or reels of not converted, unprinted blank paper and not converted boards up to basis weight of 400 g/m²;

Some converted paper products can include graphic and Kraft papers with a grammage lower than 400 g/m², such as:

- ✓ Envelopes
- ✓ Paper bags
- ✓ Paper components in filing products, mainly used for offset printing.

Filing products consist mainly of paperboard:

- ✓ Kraft paperboard / tinted paperboard, containing virgin or recycled fibres, W 160-500 g/m²
- ✓ White paperboard, W 90-410 g/m²
- ✓ Grey board, W 1100-1300 g/m²
- ✓ Drawing paper

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'Non-paper components' can be included in converted paper products. This means all the parts of a converted paper product that do not consist of paper, paperboard or paper based substrates. These non-paper components can be plastic or metal components and all other material used in converted paper products. As the majority of stationery products containing some non-paper component, especially, plastic and metal, a specific weight threshold has been defined for each of these.

The following table summarises the limit thresholds of eligibility of stationery paper products:

Stationery products subcategories	Fibres threshold	Metal threshold	Plastic threshold
Sorters and Part files			
Tree Flap Folders	> 70%		
Filing boxes			< 10%
Dividers		. 20-	
Paper Folders		< 30g	
Pads			
Exercice books			
Diaries			< 13%
Lever arch Files		< 120g	
Ring Binder			
Folders with metal fasteners	-	< 50g	. 100/
Suspension files	-		< 10%

A 'final converted paper product' consists of all fixed components (paper based or not) intended to be used by the end-consumer during the use phase (e.g. rulers, dividers, name tag, elastic, eyelet, pocket etc.). The final converted paper product can refer to one sale unit of product. All fixed components referring to packaging purpose but sold or provided with it (e.g. stickers for Gencod etc.) are not included in the final product only if:

- the EU Ecolabel is not intended to be placed on them,
- it's not intended to the use of the end-consumer,
- it can easily be removed before use by the end-consumer.

All other fixed components (not intended to be removed) and intended to be used by the end-consumer (e.g. labelling paper, back label for binder etc.) shall fulfil the requirements of the Annex to the Decision 2014/256/EU.

Components that are not fixed to the converted paper product (such as flyers, removable stickers, promotional materials) but sold or provided with it, shall fulfil the requirements of the Annex to the Decision 2014/256/EU only if the EU Ecolabel is intended to be placed on them.

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In the same way, the siliconed paper for the envelopes can be excluded from the final converted paper product due to the fact that the final recipient do not receive the siliconed paper and cannot disrupt the recycling process of the envelope.

The non-fixed removable covers intended to be used with annual diary and to be reusable after the diary is over for a new year diary, are not included in the final "converted paper products" only if the EU Ecolabel logo is not intended to be placed on them.

# Non certifiable products

The product group 'converted paper product' shall not include the following products:

- (a) Printed paper products included in the EU Ecolabel as established in Commission Decision 2012/481/EU;
  - (b) Packaging products (with the exception of paper carrier bags).

**'Packaging products'** means all products made of any materials of any nature to be used for the containment, protection, handling, delivery and presentation of goods, from raw materials to processed goods, from the producer to the user or the consumer.

# **Compiling documentation**

The applicant must compile documentation for all relevant criteria for the product. For this purpose the User Manual contains pre-made forms of declarations stating the information needed for the application. Two different levels for declarations are often used: declarations from the applicant/producer and declarations from the supplier. In case where the supplier must provide information which he wants to be held confidential to the applicant it can be sent directly to the Competent Body, which is assigned to treat confidential information.

All relevant documentation has to be sent to the Competent Body together with the application. A copy of all material must be kept by the applicant.

Three main steps may be isolated in the manufacturing of the converted paper products: printing, coating and finishing processes.

In the following notes, the levels of data collection (registrations) are specified for each of the criterion and if they apply to the non-paper components, to the printing, coating and finishing processes of the paper components or to the final converted paper product. These specifications are given with the aim of being as product specific as possible, without causing unacceptable costs for the data collection.

All information on the ecolabelled product/products should refer to the requirements in the criteria document.

The applicant shall assemble a dossier containing all relevant data and manufacturers' declarations related to the ecolabelled product. This dossier should be presented as a part of the application to verify compliance to the criteria.

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The EU Ecolabel criteria for converted paper products comprise:

- A site-specific part, related to management procedures, which remains valid until the end of the licensing period, unless changes which would impact on the EU Ecolabel criteria are introduced in the production process.
- A product-specific part, which can change during the validity of the EU Ecolabel license. Examples of changes which may vary during the validity of the EU Ecolabel license are substrate paper, consumables used for printing, coating and finishing of the converted paper product or amount of waste paper produced.

This means that, in the case where an application covers a certain converted product, the data concerning the product-specific part included in the application dossier should clearly refer that the 'worst' reference case was considered by the converting company, in order to allow all subsequent orders, produced at the same site with the same production process, and involving a lower input of the same materials and consumables, to bear the EU Ecolabel, during the validity of the criteria.

When a 'worst' reference case application is submitted and approved, any changes regarding the product-specific part related criteria which may exceed the 'worst' case (e.g., substrate paper, consumables used for printing, coating and finishing of the converted paper product or amount of waste paper produced) shall immediately be reported to the respective Competent Body, in order to be approved.

# WHO CAN APPLY FOR THE ECOLABEL?

Manufacturers, importers, services providers, traders and retailers, may submit applications for the Ecolabel. Traders and retailers may submit applications in respect of products placed on the trade market under their own brand names.

However, the documentation should always be provided by the converter responsible for the production of the converted paper product.

If the converted paper product is produced in a single Member State, the application shall be presented in this Member State.

If the converted paper product is produced in the same form in several Member States, the application may be presented in any of these Member States.

If the converted paper product is produced from outside the European Union, the application may be presented in any of the Member States in which the product is to be, or has been placed on the market.

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## WHAT DOES AN APPLICATION/CONTRACT COVER?

An EU Ecolabel license for converted paper product can only be awarded to a specific converted paper product.

A 'converted paper product' can be identified in the application process by the trade name of the converted paper product. In case of special products created in a specific work order, a concrete list of standardized product or a generic group of product defined by ranks or intervals (according to size, grammage etc) can be acceptable. For instance, for envelopes, the ranking may be different types of envelopes within the following ranges:

- size of envelopes,
- type of closing system,
- grammage of paper,
- type of outside/inside printing coverage,
- type of printing technology,
- number of windows,
- etc.

When presenting an application, the applicant must submit an identification or reference number of the reference product case in question. All consumables used for the production of the ecolabelled converted paper product, precise description of the substrate and declaration about complying with all criteria must be reported in the application. After the application has been processed by the Competent Body and if the result of the process is positive, a certificate is issued to the applicant referring to the company. A typical contract should specify reference features for the reference product case, and must be signed by the company and by the Competent Body.

A 'Check-List' is available in order to help compiling documentation for the application process and thereby ensure that all criteria are documenting when submitting an application.

#### CHOICE OF ANALYTICAL LABORATORY

In the criteria document, the "Assessment and verification requirements", paragraph 6 says: "Where possible, the testing should be performed by laboratories that meet the general requirements of EN ISO 17025 or equivalent".

There is a need for a common practice as on how this shall be interpreted. A decision hierarchy for acceptance of a laboratory is described in the following (in ranked priority):

- (1) Laboratory tests shall be performed by laboratories that are accredited for the specified test method according to ISO 17025 or GLP, where possible. The Competent Bodies accept accredited laboratories in all Member States in the EU/EEA and in countries that have signed the mutual recognition agreement according to ILAC, the international accreditation organisation. If in the Member State where the applicant submits its dossier or where the company or the concerned production plant or service is based, one or more laboratories are accredited according to ISO 17025 or GLP, applicants shall use such a laboratory, either in that Member State or another.
- (2) Laboratories with an accreditation for other tests than those required by the criteria can be accepted if they submit a declaration that the tests are done following the same quality

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management procedures as the tests for which they obtained an accreditation. In case of doubt, the Competent Body or national board shall inspect the laboratory that carries out the tests or shall select an accredited auditor who will be charged to do so.

- (3) If neither point 1 or 2 is possible, applicants should call on a non-accredited independent laboratory certified or approved by a Government Department or other public body in a Member State. In case of doubt, the Competent Body or national board shall inspect the laboratory that carries out the tests or shall select an accredited auditor who will be charged to do so.
- (4) If none of points 1 to 3 are possible, applicants may have the tests performed by an independent laboratory that is neither accredited nor approved by authorities according to point 3. Laboratories with a quality management system shall be preferred. A laboratory situated in an organisation holding an ISO 9001 certificate, may be accepted if the scope of the certification includes the laboratory. The Competent Body or national board shall verify the competence of the laboratory that carries out the tests or shall select an accredited auditor who will be charged to do so.
- (5) If none of the above mentioned points can be fulfilled, the applicant may have the tests carried out in a company laboratory (that is not accredited ISO 17025 or GLP, as this would be covered by point (1). The Competent Body or national board shall ensure that the tests are properly carried out or shall select an accredited auditor who will be charged to do so. In this case, the laboratory shall have a quality management system. A laboratory within an organisation holding an ISO 9001 certificate is accepted as being under appropriate quality management, if the scope of the certification includes the laboratory. This option may also be used for continuous monitoring of the production, including discharges and emissions, and for testing fitness for use when no standard test method exists.

## Continuous control – the responsibility of the applicant

The applicant has the responsibility to keep the product performance in continued compliance with the EU Ecolabel criteria.

After an EU Ecolabel has been granted, the applicant must keep the dossier continuously up to date. In the case where continued tests or measurements are required, the contract holder or his supplier is responsible for keeping a journal containing the test results and other relevant documentation. This documentation does not need to be sent to the Competent Body, but must be available at any time, if requested.

If data shows that the product, during the validity period of the license, no longer complies with the criteria, this must be reported to the Competent Body immediately together with a statement of the reasons for the non-compliance. The Competent Body will in each individual case decide the consequences of the non-compliance, e.g. a demand for additional measurements, suspension of the EU Ecolabel license, etc.

#### ASSESSMENT OF THE COMPLIANCE TO THE CRITERIA

The Competent Body may undertake any necessary investigations to monitor the on-going compliance by the holder of the EU Ecolabel license as regards to both the product group criteria

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and the terms of use and provisions of the contract. To this end, the Competent Body may request, and the holder shall provide, any relevant documentation to prove such compliance.

Further, the Competent Body may, at any reasonable time and without notice, request, and the holder shall grant, access to the premises.

#### COSTS

The applicant must pay all expenses for tests and verifications related to the application, holding and use of the EU Ecolabel.

The Competent Body to which an application is made shall charge a fee according to Annex III of Regulation (EC) No 66/2010 of 25 November 2009.

Applicant may be charged for travel and accommodation costs where an on-site verification is needed outside the Member State in which the Competent Body is based.

#### THE APPLICATION PROCESS

To get the EU Ecolabel licence, it is mandatory to apply using the online application tool, Ecat\_admin. Please register at the following address: https://webgate.ec.europa.eu/ecat\_admin.

Download the E-Catalogue User Manual at http://ec.europa.eu/environment/ecolabel/how-to-apply-for-eu-ecolabel.html. It will help you navigate the online system. If you have any problems using the system, contact your Competent Body.

Please note that the required paper file will also need to be submitted to the relevant Competent Body once the application in Ecat\_admin has been made.

After receiving an application the Competent Body will go through the dossier including the documentation sent directly from the suppliers. The Competent Body has the possibility to ask for further information, if necessary.

The officer at the Competent Body who is assessing the application makes a list of missing documentation, which is communicated to the applicant. The applicant makes sure that the listed requirements are met and provides the Competent Body the missing documentation. In most cases it may be necessary to send more than one list of missing documentation.

As part of the assessment process, the Competent Body may carry out an on-site visit to the applicant and/or his suppliers.

When all requirements have been met, the Competent Body will sign a contract with the applicant specifying the terms of use of the EU Ecolabel, following the standard contract on Annex IV of the Regulation (EC) No 66/2010 of 25 November 2009.

When criteria documents are revised, the license holders will have to apply for re-assessment of their license according to the revised criteria. A transition period for adjusting the products and apply for re-assessment will apply. This will be announced by the European Commission.

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# GENERAL ABOUT ECOLOGICAL CRITERIA

These criteria apply to all such processes undertaken at the site or sites or dedicated lines where the converting paper product is converted. If there are converting, printing, coatings and finishing processes exclusively used for ecolabelled products, criteria 2, 4, 5, 6 and 7 shall apply to those processes only. The ecological criteria do not cover the transport of raw materials, consumables and final products.

- Criterion 1 applies only to substrates used in the final converted paper product.
- Criteria 4, 9, 10 and 11 apply to the final converted paper product.
- Criterion 3 applies both to the non-paper components of the converted paper product and to the converting, printing, coating and finishing processes of the paper components.
- Criteria 5, 6, 7 and 8 apply to the converting, printing, laminating and finishing processes of the paper components only.

The specific assessment and verification requirements are indicated within each criterion.

All printing or converting on the converted paper product shall fulfil the criteria. Parts of the product that are printed or converted by a sub-contractor shall therefore also fulfil the related requirements. The application shall include a list of all the printing houses and subcontractors involved in the production of the converted paper, and their geographic locations.

The applicant shall provide a list of chemical products used in the printing house for the production of the converted paper products. This requirement applies to all consumables used during the converting, printing, coating and finishing processes. The list provided by the applicant shall include the amount, function and supplier of any chemical product used, together with the Safety Data Sheet, designed in accordance with the guidance in sections 10, 11 and 12 of Annex II to Regulation (EC) No 1907/2006 of the European Parliament and of the Council.

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The following table summarise the application of criteria.

CRITERION 1. Substrate	Applies to paper/board raw material
	Applies to paper raw material (sheets or
Part A — Paper Substrate	reels) up to basis weight of 400 g/m². (refers
	to pulp and paper production)
	Applies to board raw material (paperboard,
	cardboard or board) with a basis weight
Part B — Board Substrate	higher than 400 g/m² (refers to pulp and
	laminating paper production as well as
	board production)
CRITERION 2. Fibres: sustainable forest	Applies to both substrates: 'paper' and
management	'board' raw material.
	Applies to non-fibre components. (Do not
	apply to paper and board as it is.)
CRITERION 3. Excluded or limited substances	Applies to both applicant manufacturing site
and mixtures	and/or subcontrator site.
	Applies to converting processes such as
	printing, coating, and/or finishing.
CRITERION 4. Recyclability	Applies to final converted paper product
	Applies to fibre components only. (Do not
	apply to non-fibre components).
CRITERION 5. Emissions	Applies to both applicant manufacturing site
	and/or subcontrator site.
	Applies to printing processes only.
CRITERION 6. Waste	Applies to fibre components only. (Do not
CRITERION 6. Waste	apply to non-fibre components).
	Applies to both applicant manufacturing site
CRITERION 7. Energy	and/or subcontrator site.
	Applies to converting processes such as
CRITERION 8. Training	printing, coating, and/or finishing of paper
	components.
CRITERION 9. Fitness for use	
CRITERION 10. Information on the product	Applies to final converted paper product
CRITERION 11. Information appearing on the EU	
Ecolabel	

### **SUB-CONTRACTORS' OPERATIONS CONCERNED:**

Sub-contractors of finishing operations concerned by this criterion refer to all operations which have an influence on the criteria compliance i.e. generating paper waste, and/or using chemicals consumable that could end up in the final product and/or using electricity.

The handling operations such as e.g. the label/stickers manually putting on the product; or sorting operations of colour; or arrange products on the sales display-box, etc. are not included.

The operation that consists on print the envelopes directly by the routers are not included as this operation cannot be controlled by the envelope producers.

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Where the applicant is required to provide declarations, documentation, analyses, test reports, or other evidence to show compliance with the criteria, it is understood that those may originate from the applicant and/or his supplier(s) and/or their supplier(s), as appropriate.

Where appropriate, test methods other than those indicated for each criterion may be used if their equivalence is accepted by the competent body assessing the application.

Competent Bodies shall preferentially recognise tests which are accredited according to ISO 17025 and verifications performed by bodies which are accredited under the EN 45011 standard or an equivalent international standard.

Where appropriate, competent bodies may require supporting documentation and may carry out independent verifications.

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# Criterion 1 - Substrate

# PART A – PAPER Substrate

This section applies to paper, paperboard and/or cardboard (sheets or reels) up to basis weight of  $400 \text{ g/m}^2$ .

The substrate used shall be in conformity with the criteria 1, 2, 4 and 5 of the EU Ecolabel as established in Commission Decision 2011/333/EU for Copying and graphic paper or in Commission Decision 2012/448/EU for Newsprint paper and shall demonstrate the conformity to the criterion 2 — Fibres: sustainable forest management of the EU Ecolabel as established in this Commission Decision for converted paper products.

#### **Assessment and verification:**

The applicant shall provide the specifications of the converted paper products concerned, including the trade names, amounts and weight/m² of the paper used. The list shall also include the names of the suppliers of the papers used.

- Conformity with the criteria 1, 2, 4 and 5 of the EU Ecolabel as established in Decision 2011/333/EU or Decision 2012/448/EU shall be proven for each substrate by providing a copy of a valid EU Ecolabel certificate for the paper used.
- Conformity with criterion 2 on fibres sustainable forest management shall be proven for each substrate by providing a PEFC, FSC or equivalent certificate valid for the substrate used, or through a self-declaration in case the applicant already has a valid EU Ecolabel certificate for the substrate used.

# REQUIRED DOCUMENTATION FOR ASSESSMENT AND VERIFICATION

The applicant shall demonstrate compliance with the criteria 1, 2, 4 and 5 by providing at least one of the following evidences at choice:

- ✓ A copy of a valid EU Ecolabel certificate for 'copying and graphic paper', or 'Newsprint paper', or
- ✓ A declaration from the Competent Body, referring that an EU Ecolabel license was awarded to substrate paper used, or
- ✓ The appendix of the contract signed by the paper producer and by the Competent Body, referring explicitly the EU Ecolabel license number and the trade name concerning the substrate paper used by the applicant, or
- ✓ If the paper substrate is out of the scope of the EU Ecolabel as established in Commission Decision 2011/333/EU for Copying and graphic paper or in Commission Decision 2012/448/EU for Newsprint paper, and compliance cannot be proven with a valid certificate, it shall be proven similarly than for the board substrate as described in part B below i.e. kraft paper.

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Please note that if requested by the Competent Body, the applicant may have to provide the invoices related to the EU Ecolabel paper substrate used. If the mention of EU Ecolabel certification on the invoices is technically not able to be putting on (dematerialization of paper invoices), the invoice shall prove the traceability of the paper with added certificates or other equivalent evidences.

Information on the paper substrate used in the final converted paper product should be provided to the Competent Body in Form 1 (Annex 1).

Conformity with criterion 2 on Fibres: sustainable forest management shall be proven in accordance to the CRITERION 2 section.

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# PART B - BOARD Substrate

This section applies to 'Board substrate'. This means paperboard, cardboard or board, as well as Kraft paper, with a basis weight higher than 400 g/m2.

This section can be applied as well to all paper substrate out of the scope of the EU Ecolabel as established in Commission Decision 2011/333/EU for Copying and graphic paper or in Commission Decision 2012/448/EU for Newsprint paper, and compliance cannot be proven with a valid certificate.

Information on the board substrate used in the final converted paper product should be provided to the Competent Body in Form 1 (Annex 1).

# **Criterion B1 - Emissions to water and air**

# a) COD, Sulphur, NOx, Phosphorous

For each of these parameters, the emissions to air and/or water from the pulp, the laminating papers and the board production shall be expressed in terms of points (PCOD, Ps, PNOx, PP) as detailed below. None of the individual points PCOD, Ps, PNOx, PP shall exceed 1,5.

The total number of points  $(P_{total} = P_{COD} + P_{S} + P_{NOx} + P_{P})$  shall not exceed 4,0.

The calculation of P COD shall be made as follows (the calculations of Ps, PNOx, PP shall be made in exactly the same manner).

For each pulp 'i', or each laminating paper, 'i' used, the related measured COD emissions (COD<sub>pulp</sub>, i or COD<sub>paper</sub>, i expressed in kg/air dried tonne — ADT), shall be weighted according to the proportion of each pulp or laminating paper used (pulp 'i', or paper 'i', with respect to air dried tonne of pulp, or paper), and summed together. The weighted COD emission for the pulps, or laminating papers, is then added to the measured COD emission from the board production to give a total COD emission, CODtotal.

The weighted COD reference value for the pulp production or laminating paper production shall be calculated in the same manner, as the sum of the weighted reference values for each pulp or laminating paper used and added to the reference value for the board production to give a total COD reference value CODref, total. The reference values for each pulp or laminating paper type used and for the board production are given in the Table 1.

Finally, the total COD emission shall be divided by the total COD reference value as follows:

$$P_{COD} = \frac{COD_{total}}{COD_{ref,total}} = \frac{\sum\limits_{i=1}^{n} \left[ pulp \ or \ laminating \ paper,i \times \ COD_{pulp \ or \ laminating \ paper,i} \right) \right] + COD_{board \ machine}}{\sum\limits_{i=1}^{n} \left[ pulp \ or \ laminating \ paper,i \times \ COD_{refpulp \ or \ laminating \ paper,i} \right) \right] + COD_{ref \ board \ machine}}$$

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Where:

$\mathrm{COD}_{\mathrm{total}}$	Total emissions from the production of approved fiber based substrate for
	EU Ecolabelled converted paper product.
COD <sub>ref, total</sub>	Total of weighted totals of reference values for pulps and reference value
	for the machine producing substrate.
COD <sub>pulp</sub> or laminating paper, i	COD emissions from pulp production or laminating paper production.
COD <sub>board machine</sub>	COD emissions from the machine producing substrate.
COD <sub>ref</sub> pulp or laminating paper, i	Reference value for pulp or laminating paper i (see table below).
COD <sub>ref board machine</sub>	Reference value for the machine producing substrate and substrate type
	(see table below).
Pulp or laminating paper,i	Proportion of the pulp type expressed as "tonne 90% pulp per tonne total
	pulp mix".
n	Number of constituent pulps or laminating paper.
i	Index of each individual pulp or laminating paper, and runs from 1 to n.

 $\label{thm:condition} \mbox{Table 1}$  Reference values for emissions from different pulp types and from board production

	Emissions (kg/ADT)*			
Pulp Grade/Board	COD reference	S reference	NOx,	P reference
Bleached Chemical pulp (others	18,0	0,6	1,6	0,045 *
than sulphite)				* exemption from this level, up to a level of 0.1 shall be given where it can be demonstrated that the higher level of P is due to P naturally occurring in the wood pulp
Bleached Chemical pulp (sulphite)	25,0	0,6	1,6	0,045
Unbleached chemical pulp	10,0	0,6	1,6	0,04
CTMP	15,0	0,2	0,3	0,01
TMP/groundwood pulp	3,0	0,2	0,3	0,01
Recycled fibres pulp	2,0	0,2	0,3	0,01
Laminating bleached kraft paper	19	0,9	2,4	0,055
Laminating unbleached kraft paper	11	0,9	2,4	0,055
Laminating recycled paper	3	0,5	1,1	0,02
Board production (non- integrated mills where all pulps used are purchased market pulps)	1	0,3	0,8	0,01
Board production (integrated mills)	1	0,3	0,7	0,01

In case of integrated mills, due to the difficulties in getting separate emission figures for pulp/laminating paper and substrate, if only a combined figure for pulp/laminating paper and substrate production is available, the emission values for pulp(s) shall be set to zero in the above

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equation and the figure for the substrate mill shall include both pulp/laminating paper and substrate production.

In many cases the produced substrate contains only one type of pulp together with fillers and possible coating. However, there are also cases where different types of pulps are mixed. Annex 2 shows the calculation of COD emissions (the calculations of  $P_S$ ,  $P_{NOx}$ ,  $P_P$  shall be made in exactly the same manner).

# Annex 2:

- Example 1: Calculation of emission points for a non-integrated substrate mill.
- Example 2: Calculation of the allocation of S and NOx emissions between heat and electricity production.

#### More about COD and P

When various types of pulps with different reference values are mixed, the real emission values of COD as well as the reference value for the pulp mixture in the denominator in the equation shall be the weighted share of each pulp type in the ADT substrate. For calculation details see example 1 in Annex 2.

The emission data shall in the first place be provided for each type of pulp used for the ecolabelled substrate and the substrate production. However, in some cases it is not necessary to know the emissions separately for pulp/laminating paper and substrate production as in case of DIP production that is integrated with the substrate machine where only one type of substrate is produced. Where the pulp is sold as a market pulp, the emissions to water from the pulp production shall always be measured regardless if the production is integrated or not.

At an integrated pulp/laminating paper and substrate mill there are often several substrate machines producing various types of substrate. The real emissions should be known from each of the substrate machines but in some cases it is not possible to make proper measurements, for example in cases where the circulating water systems are mixed together. In such cases a mean efficiency for the entire integrated mill can be calculated from the reference values. The emissions from the various substrate machines can then be calculated from the calculated mill efficiency value and the proportions of the contribution from the substrate machines. For substrate machines in which changes in the production are done within short periods of time and where the COD and P emissions of the various types of substrate can be regarded to be approximately the same, an average value for emissions of the substrate machine can be used.

In cases where the waste water or part of it is treated in a treatment plant outside the mill, for example, in a public treatment plant, the measurements of COD and P must be made before treatment and the values used in the calculation should be multiplied by the efficiency of the site treatment plant. In cases where the waste water or part of it is treated in a treatment plant outside the mill, for example, in a public treatment plant, it is important that also this effluent is taken into account when the total emission to the water are reported. In some cases it is necessary to take samples from the internal flows prior to the treatment plant to make it possible to make the

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necessary allocations. In those cases the efficiency of the treatment plant shall be used to calculate the reduction of the COD and P values before use in the calculations.

On sites where different pulps are produced, with only some to be used for substrates for ecolabelled converted paper products, the measurements of COD and P must be made before final site treatment (i.e. on samples from the internal flows) and the values used in the calculation should be multiplied by the efficiency of the site treatment plant.

Measurements of emissions to water shall be taken on unfiltered and unsettled samples either after treatment at the plant or before treatment by a public treatment plant. The period for the measurements shall be based on the production during 12 months. In case of a new or a rebuilt production plant, the measurements shall be based on at least 45 subsequent days of stable running of the plant. If the production of substrates for ecolabelled converted paper products is running in campaigns shorter than 45 days, averages from more than one campaign during a longer period will be accepted if the total average for several short campaigns is based on samples from at least 45 days. Such discontinuous measurements shall be explicitly stated in the application documents. The measurement shall be representative of the respective campaign. If the substrate for ecolabelled converted paper product is produced in a single run shorter than 45 days an average for the run will be accepted.

A sample shall be composed of a representative 24 hours collection sample (daily samples) e.g. flow-proportional sample or an equivalent procedure. A number of daily samples may be added together and analysed as one. The minimum testing frequency for COD and P is one test per week.

The applicant shall present supporting documentation including test reports using the following test methods:

Parameter	Test method
COD	ISO 6060
	EN ISO 6878
P	APAT IRSA CNR 4110
	Dr Lange LCK 349

#### More about S and NOx

The emissions to the air are closely related to the energy consumption in the different phases of the production process. It is therefore, necessary to have basic data for the energy production to be able to calculate the total emissions of S and NOx for the entire pulp/laminating paper/substrate production. For calculation details see example 2 in Annex 2.

The basic data is the amount of fuels used (both fossil fuels in the form of for example oil, coal or gas as well as renewable resources) in the energy production (steam and electricity) as well as directly in the different production processes. The amount of heat and electricity produced and the annual emissions of S and NOx from the pulp/laminating paper/substrate processes and the energy production shall also be provided. In some cases the emissions can be calculated from the fuels.

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The requirements are only set on the part of the emissions of S and NOx that originate from the heat energy production. The emissions related to the generation of electricity are excluded from the calculations. To be able to separate the emissions from the electricity generation from the heat production in cases where both heat and electricity is generated at the same plant, an allocation of the emissions has to be done to the electricity (the net electricity) and the heat generation (the net heat).

In case of a co-generation of heat and electricity at the same plant the emissions of S and NOx resulting from electricity generation can be subtracted from the total amount. The following equation can be used to calculate the proportion of the emissions resulting from electricity generation:

The electricity in this calculation is the electricity produced at the co-generation plant. The heat in this calculation is the net heat delivered from the power plant to the pulp/laminating paper/board/substrate production.

The period for the calculations or mass balances shall be based on the production during 12 months. In case of a new or a rebuilt production plant or substantial modification, the calculations shall be based on at least 45 subsequent days of stable running of the plant. The calculations shall be representative of the respective campaign.

### Determination of Sulphur (S) emissions:

- Data on the sulphur emissions must be provided for each quality of pulp/laminating paper used and for the substrate production. The sulphur emissions must be expressed as kg S per air dry tonne (90% dry) pulp.
- If gas-cleaning technology is used, gaseous sulphur shall be measured after the cleaning process.
- The reported emission values for S to air shall include both oxidised and reduced S emissions (dimethyl sulphide, methyl mercaptan, hydrogen sulphide and the like).
- Measurements shall include all energy plants at the pulp/laminating paper/board/other substrate mill such as recovery boilers, lime kilns, steam boilers and destructor furnaces for strong smelling gases. Diffuse emissions shall be taken into account. The measurements shall include energy generated at heat and power plants either in-site or off-site, except those emissions related to the production of electricity. Reported emission values for S to air shall include both oxidised and reduced S emissions (dimethyl sulphide, methyl mercaptan, hydrogen sulphide and the like).
- The S emissions related to the heat energy generation from oil, coal and other external fuels with known S content may be calculated instead of measured, and shall be taken into account.
- If the sulphur emissions originate from different sources, the applicant may calculate the emissions related to the energy generation from oil, coal and other external fuels. The emissions from recovery boilers and lime kilns must be measured.

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• The applicant must report the test methods/standards used when measuring the emissions. The application must include the full results of the tests and/or the basis for calculations (as the specification of the S content of the oil or gas) to emissions per every certain quantity of pulp/laminating paper or board. The test methods to be used are:

Parameter	Test method
S(oxid.)	EPA no.8
S(red.)	EPA no 16A
S content in oil	ISO 8754
S content in coal	ISO 351

However, continuous measurements can be accepted if appropriate evidence of third party control is provided.

Determination of Nitrogen Oxides (NOx) emissions:

- Data on the  $NO_x$  emissions must be provided for each pulp quality and for the board production. The  $NO_x$  must be expressed as kg  $NO_x$  per air-dry tonne (90% dry) pulp.
- It shall include all emissions of NOx which occur during the production of pulp/laminating paper and substrate, including steam generated outside the production site, except those emissions related to the production of electricity. Measurements shall include all energy plants at the pulp/laminating paper/board mill such as recovery boilers, lime kilns, steam boilers and destructor furnaces for strong smelling gases. Diffuse emissions shall be taken into account. The measurements shall include energy generated at heat and power plants either in-site or off-site.
- If gas-cleaning technology is used, NOx shall be measured after the cleaning process.
- The test methods to be used are:

Parameter	Test method	
NO <sub>x</sub>	ISO 11564	

However, continuous measurements can be accepted if appropriate evidence of third party control is provided.

# **Assessment and verification:**

The applicant shall provide detailed calculations showing compliance with this criterion, together with related supporting documentation which shall include test reports using the following test methods: COD: ISO 6060; NOx: ISO 11564; S(oxid.): EPA No 8; S(red.): EPA No 16A; S content in oil: ISO 8754; S content in coal: ISO 351; P: EN ISO 6878, APAT IRSA CNR 4110 or Dr Lange LCK 349.

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The supporting documentation shall include an indication of the measurement frequency and the calculation of the points for COD, S and NOx. It shall include all emissions of S and NOx which occur during the production of pulp, laminating paper and board, including steam generated outside the production site, except those emissions related to the production of electricity. Measurements shall include recovery boilers, lime kilns, steam boilers and destructor furnaces for strong smelling gases. Diffuse emissions shall be taken into account. Reported emission values for S to air shall include both oxidised and reduced S emissions (dimethyl sulphide, methyl mercaptan, hydrogen sulphide and the like). The S emissions related to the heat energy generation from oil, coal and other external fuels with known S content may be calculated instead of measured, and shall be taken into account.

Measurements of emissions to water shall be taken on unfiltered and unsettled samples either after treatment at the plant or after treatment by a public treatment plant. The period for the measurements shall be based on the production during 12 months. In case of a new or a rebuilt production plant, the measurements shall be based on at least 45 subsequent days of stable running of the plant. The measurement shall be representative of the respective campaign.

In case of integrated mills, due to the difficulties in getting separate emission figures for pulp, laminating paper and board, if only a combined figure for pulp, laminating paper and board production is available, the emission values for pulp(s) shall be set to zero and the figure for the board mill shall include pulp, laminating paper and board production.

# REQUIRED DOCUMENTATION FOR ASSESSMENT AND VERIFICATION

The supporting documentation shall include an indication of the measurement frequency and the calculation of the points for COD, P, S and NOx. The applicant must report the test methods/standards used when measuring the emissions. The application must include the full results of the tests and/or the basis for to emissions per every certain quantity of pulp/laminating paper or substrate. The applicant should use tables given in Annex 3 to provide information on the basic data such as the number and type of the energy plants, fuels, produced amount of energy (both heat and electricity) in each boiler and the emissions of S and NOx for each plant.

# b) AOX Emissions

The weighted average value of AOX released from the productions of the pulps used in the substrate shall not exceed 0,170 kg/ADT board.

AOX emissions from each individual pulp used in the substrate shall not exceed 0,250 kg/ADT pulp.

The AOX shall only be measured in processes where chlorine compounds are used for the bleaching of the pulp. It need not be measured in the effluents from non-integrated board production or in the effluents from pulp production where the bleaching is performed with chlorine-free substances. Pulps that are bleached with chlorine gas cannot be used for ecolabelled converted paper product.

In cases where the waste water or part of it is treated in a treatment plant outside the mill, for example, in a public treatment plant, the measurements of AOX must be made before treatment and the values used in the calculation should be multiplied by the efficiency of the site treatment

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plant. In cases where the waste water or part of it is treated in a treatment plant outside the mill, for example, in a public treatment plant, it is important that also this effluent is taken into account when the total emission to the water are reported. In some cases it is necessary to take samples from the internal flows prior to the treatment plant to make it possible to make the necessary allocations. In those cases the efficiency of the treatment plant shall be used to calculate the reduction of the AOX value before use in the calculations.

On sites where different pulps are produced, with only some to be used for substrates for ecolabelled converted paper products, the measurements of AOX must be made before final site treatment (i.e. on samples from the internal flows) and the values used in the calculation should be multiplied by the efficiency of the site treatment plant.

Measurements of emissions to water shall be taken on unfiltered and unsettled samples either after treatment at the plant or after treatment by a public treatment plant. The period for the measurements shall be based on the production during 12 months. In case of a new or a rebuilt production plant, the measurements shall be based on at least 45 subsequent days of stable running of the plant. The measurement shall be representative of the respective campaign. If the production of pulp is running in campaigns shorter than 45 days, averages from more than one campaign during a longer period will be accepted if the total average for several short campaigns is based on samples from at least 45 days. Such discontinuous measurements shall be explicitly stated in the application documents. The measurement shall be representative of the respective campaign. If the pulp is produced in a single run shorter than 45 days an average for the run will be accepted.

A sample shall be composed of a representative 24 hours collection sample (daily samples) e.g. flow-proportional sample or an equivalent procedure. A number of daily samples may be added together and analysed as one.

The minimum testing frequency for AOX is one test per month. For shorter measuring campaigns than six months, the minimum number of AOX tests performed is at least six.

The test methods to be used are:

Parameter	Test method
AOX	ISO 9562

# **Assessment and verification:**

The applicant shall provide test reports using the following test method: AOX ISO 9562 accompanied by detailed calculations showing compliance with this criterion, together with related supporting documentation.

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The supporting documentation shall include an indication of the measurement frequency. AOX shall only be measured in processes where chlorine compounds are used for the bleaching of the pulp. AOX need not be measured in the effluent from non-integrated board production or in the effluents from pulp production without bleaching or where the bleaching is performed with chlorine-free substances.

Measurements shall be taken on unfiltered and unsettled samples either after treatment at the plant or after treatment by a public treatment plant. The period for the measurements shall be based on the production during 12 months. In case of a new or a re-built production plant, the measurements shall be based on at least 45 subsequent days of stable running of the plant. The measurement shall be representative of the respective campaign..

# REQUIRED DOCUMENTATION FOR ASSESSMENT AND VERIFICATION

The supporting documentation shall include an indication of the measurement frequency.

Information on measurement can be provided to the Competent Body in Form 2 Annex 3

# c) CO<sub>2</sub> emissions

The emissions of carbon dioxide from non-renewable sources shall not exceed 1 000 kg per tonne of substrate 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 1 100 kg per tonne. The emissions shall be calculated as the sum of the emissions from the pulp and board production.

The emissions shall be expressed as  $kg CO_2$  per air-dry tonne (90 % dry) pulp/laminating paper and substrate and added up for the whole process of pulp/laminating paper and substrate production.

The following emission factors shall be used in the calculation of the CO2 emissions from fuels:

Table 2

Fuel	CO <sub>2</sub> fossil emissions	Unit
Coal	95	g CO <sub>2</sub> fossil/MJ
Crude oil	73	g CO <sub>2</sub> fossil/MJ
Fuel oil 1	74	g CO <sub>2</sub> fossil/MJ
Fuel oil 2-5	77	g CO <sub>2</sub> fossil/MJ
LPG	69	g CO <sub>2</sub> fossil/MJ
Natural Gas	56	g CO <sub>2</sub> fossil/MJ
Grid Electricity	400	g CO <sub>2</sub> fossil/kWh

The period for the calculations or mass balances shall be based on the production during 12 months. In case of a new or a rebuilt production plant, the calculations shall be based on at least

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45 subsequent days of stable running of the plant. The calculations shall be representative of the respective campaign.

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.

The amount of energy from renewable sources purchased and used for the production processes shall not be considered in the calculation of the CO2 emissions: appropriate documentation that this kind of energy are actually used at the mill or are externally purchased shall be provided by the applicant.

#### **Assessment and verification:**

The applicant shall provide detailed calculations showing compliance with this criterion, together with related supporting documentation.

The applicant shall provide data on the air emissions of carbon dioxide. This shall include all sources of non-renewable fuels during the production of pulp and board, including the emissions from the production of electricity (whether on-site or off-site).

The applicant shall provide detailed information of all carbon dioxide emissions derived from the production of pulp/laminating paper and substrate, i.e. from the production of wood-chips or deinking, to the final product. The information shall include all sources of non-renewable fuels as well as the purchased electricity used for the production of pulp/laminating paper and substrate.

In case of non-integrated production, the applicant must provide this information for the pulp/pulps used for the respective substrate product. In calculating the weighted average, each pulp is taken into account regarding to its share in the moist substrate.

If grid electricity is used in any of the phases of manufacturing, the contribution to  $CO_2$  emission due to public electricity generation must be included. The contribution of the grid electricity is calculated by multiplying the amount electricity required to produce one tonne of candidate product by  $400 \text{ g } CO_2 / \text{kWh}$  (the European average).

# REQUIRED DOCUMENTATION FOR ASSESSMENT AND VERIFICATION

The applicant shall provide detailed information of all carbon dioxide emissions derived from the production of pulp/laminating paper and substrate, i.e. from the production of wood-chips or deinking, to the final product. The information shall include all sources of nonrenewable fuels as well as the purchased electricity used for the production of pulp/laminating paper and board. In case of non-integrated production, the applicant must provide this information for the pulp/pulps used for the respective substrate product. The applicant should use table 2 in Annex 2 to provide information on the basic data such as the number and type of the energy plants, fuels, produced amount of energy (both heat and electricity) in each boiler and the emissions CO2 for each plant.

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# Criterion B2 - Energy use

The requirements on energy use are imposed both on the pulp/laminating paper and the substrate producer.

The requirements encompass restrictions on the use of energy in the form of fuel and electricity. The basis used is information on actual energy consumption in production, in relation to specific reference values stipulated in the criteria document.

The specific reference values are given in Table 3 (see below). The quotient between these values determines the energy points rating. The quotient shall be less than or equal to 1,5. For example, the calculation of fuel points  $(P_F)$  for pulp/laminating paper and substrate production shall be done as follows:

$$P_{F} = \frac{\sum_{i=1}^{n} [pulp, i \times F_{pulp,i}] + F_{paper}}{\sum_{i=1}^{n} [pulp, i \times F_{ref\ pulp,i}] + F_{ref\ paper}}$$

The calculation principles are the same than in the calculations of the COD points. For calculation details see Annex 2.

# (a) Electricity

The electricity consumption related to the pulp, laminating paper and the board production shall be expressed in terms of points ( $P_E$ ) as detailed below.

The number of points,  $P_E$ , shall be less than or equal to 1,5.

The calculation of  $P_E$  shall be made as follows.

Calculation for pulp or laminating paper production: For each pulp, laminating paper i used, the related electricity consumption (E pulp or laminated paper, i expressed in kWh/ADT) shall be calculated as follows:

 $E_{pulp \text{ or laminating paper, i}}$  = Internally produced electricity + purchased electricity - sold electricity

Calculation for board production: Similarly, the electricity consumption related to the board production ( $E_{board}$ ) shall be calculated as follows:

E board = Internally produced electricity + purchased electricity - sold electricity

# Calculation for total electricity use:

Finally, the points for pulp, laminating paper and board production shall be combined to give the overall number of points ( $P_E$ ) as follows:

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$$P_{E} = \frac{\sum\limits_{i=1}^{n} \left[ pulp \ or \ laminated \ paper, i \times E_{pulp \ or \ laminated, i} \right] + E_{board}}{\sum\limits_{i=1}^{n} \left[ pulp \ or \ laminated \ paper, i \times E_{refpulp \ or \ laminated, i} \right] + E_{refboard}}$$

In case of integrated mills, due to the difficulties in getting separate electricity figures for pulp, laminating paper and board, where only a combined figure for pulp, laminating paper and board production is available, the electricity values for pulp(s) shall be set to zero and the figure for the board mill shall include pulp, laminating paper and board production.

# b) Fuel (heat)

The fuel consumption related to the pulp, laminating paper and the board production shall be expressed in terms of points  $(P_F)$  as detailed below.

The number of points,  $P_F$ , shall be less than or equal to 1,5.

The calculation of PF shall be made as follows.

- Calculation for pulp or laminating paper production: For each pulp, laminating paper i used, the related fuel consumption (Fpulp or laminated paper, i expressed in kWh/ADT) shall be calculated as follows:

Fpulp or laminating paper, i = Internally produced fuel + purchased fuel - sold fuel - 1,25  $\times$  internally produced electricity

Note:

Fpulp or laminating paper, i (and its contribution to PF, pulp or laminating paper) need not be calculated for mechanical pulp unless it is market air dried mechanical pulp containing at least 90 % dry matter.

The amount of fuel used to produce the sold heat shall be added to the term 'sold fuel' in the equation above.

- Calculation for board production: Similarly the fuel consumption related to the board production (F board, expressed in kWh/ADT), shall be calculated as follows:

 $F_{board} = Internally \ produced \ fuel + purchased \ fuel - sold \ fuel - 1,25 \times internally \ produced$  electricity

Finally, the points for pulp and board production shall be combined to give the overall number of points (PF) as follows:

$$P_{F} = \frac{\sum\limits_{i=1}^{n} \left[ \text{pulp or laminating paper,i} \times F_{\text{pulp or laminating paper,i}} \right] + F_{\text{board}}}{\sum\limits_{i=1}^{n} \left[ \text{pulp or laminating paper,i} \times F_{\text{refpulp or laminating paper,i}} \right] + F_{\text{refboard}}}$$

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Table 3
Reference values for electricity and fuel

Pulp grade	Fuel kWh/ADT	Electricity kWh/ADT
Tulp grade	Freference	$\mathbf{E}_{ ext{reference}}$
	4000	
Chemical pulp	(Note: for air dry market pulp containing at least 90% dry mater (admp), this value may be upgraded by 25% for the drying energy)	800
	900	
Mechanical pulp	(Note: this value is only applicable for admp)	1900
CTMP	1000	2000
	1800	
Recycled fibre pulp	(Note: for admp, this value may be upgraded by 25 % for the drying energy)	800
Laminating kraft paper	4400	4.400
(bleached or unbleached)	6100	1600
Laminating recycled paper	3900	1600
Board/substrate production	2100	800

# Assessment and verification (for both (a) and (b)):

The applicant shall provide detailed calculations showing compliance with this criterion, together with all related supporting documentation. Reported details shall therefore include the total electricity and fuel consumption.

The applicant shall calculate all energy inputs, divided into heat/fuels and electricity used during the production of pulp and board, including the energy used in the de-inking of waste papers for the production of recycled board.

Energy used in the transport of raw materials, as well as conversion and packaging, is not included in the energy consumption calculations.

Total heat energy includes all purchased fuels. It also includes heat energy recovered by incinerating liquors and wastes from on-site processes (e.g. wood waste, sawdust, liquors, waste paper, paper broke), as well as heat recovered from the internal generation of electricity — however, the applicant need only count 80 % of the heat energy from such sources when calculating the total heat energy.

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# Ecolabel www.ecolabel.eu

#### CONVERTED PAPER PRODUCT USER'S MANUAL (Commission Decision 2014/256/EU)

Electric energy means net imported electricity coming from the grid and internal generation of electricity measured as electric power.

Electricity used for wastewater treatment need not be included.

Where steam is generated using electricity as the heat source, the heat value of the steam shall be calculated, then divided by 0,8 and added to the total fuel consumption.

In case of integrated mills, due to the difficulties in getting separate fuel (heat) figures for pulp, laminating paper and board, if only a combined figure for pulp, laminating paper and board production is available, the fuel (heat) values for pulp(s) shall be set to zero and the figure for the board mill shall include pulp, laminating paper and board production.

Electric energy means net imported electricity purchased from the grid and internal generation of electricity measured as electric power, where the working power used in and by the power plant for the generation of the electricity is deducted, i.e. the part of the electricity that is purchased by the pulp/laminating paper/substrate producer from the power plant is the net electricity.

For electricity, both purchased electricity and electricity produced in-site must be included.

The value for energy use shall be allocated to the substrate used in ecolabelled converted paper product. In exceptional cases where the products can be regarded as being of equal quality and are produced using comparable processes within the same production unit, average values for substrate used in ecolabelled products and substrates that are not used in ecolabelled converted paper products may be used. This applies to both pulp/laminating paper and substrate production.

The reference value for fuel encompasses fuel used in heat production.

As fuel may also be used for generation of electricity internally, the corresponding amount of fuel is deducted from the actual consumption (=1,25  $\times$  internally generated net electricity). This prevents energy figures for fuel used in internal electricity generation being counted twice.

Any surplus energy that can be sold off as electricity, steam or heating, is deducted from the total consumption figure.

For fuel, both purchased fuel and residual products such as e.g. black liquor, bark and chips must be specified. The fuel used for both heat production and internal electricity generation must be specified. Fuel consumption is calculated based on the effective heat value of the dry substance.

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Calculations can either be based on heat values measured in-site, or the values shown in the table 4.

Table 4.
Effective (lower) values

Fuel	Heat Value (Lower)	Unit
Wood briquettes	10,00	GJ/m <sup>3</sup> loose
Wood pellets	10,00	GJ/m <sup>3</sup> loose
Wood powder	3,80	GJ/m <sup>3</sup> loose
Wood chips	3,55	GJ/m <sup>3</sup> loose
Sawdust	2,90	GJ/m <sup>3</sup> loose
Bark	2,22	GJ/m <sup>3</sup> loose
Piece peat	4,50	GJ/m <sup>3</sup> loose
Milled peat	3,75	GJ/m <sup>3</sup> loose
Sulphate black liquor	12,70	GJ/kg DS
Sulphite black liquor	14,70	GJ/kg DS
Tall pitch oil	36,80	GJ/m <sup>3</sup>
Natural gas	38,90	MJ/m <sup>4</sup>
Light fuel oil	36,00	GJ/m <sup>5</sup>
Heavy fuel oil	38,70	GJ/m <sup>6</sup>
LPG	46,10	MJ/kg
Coal	26,50	MJ/kg

# REQUIRED DOCUMENTATION FOR ASSESSMENT AND VERIFICATION

The applicant shall provide detailed calculations showing compliance with this criterion, together with all related supporting documentation. The calculation includes energy scores for all pulps used and energy scores for the board production.

The consumption of electricity and fuel shall be based on bills and electricity meter readings. Internally produced electricity can be documented on the basis of readings of the mill's own electricity meters. In the case of purchased fuel the purchased quantity must be reconciled in relation to the quantity at the start and end of the year in question. Internal consumption of residual products such as liquor, bark, chippings etc. is calculated on the basis of the estimated thermal value of the fuel used (see Table 4). Accordingly reporting encompasses the total (purchased) electricity consumption and consumption of fuel.

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# Criterion B3 – Excluded or limited substances and mixtures

This criterion applies for both pulp, lamination paper and board production.

# a) Hazardous substances and mixtures

In accordance with Article 6(6) of Regulation (EC) No 66/2010 of the European Parliament and of the Council, the board shall not contain substances referred to in Article 57 of Regulation (EC) No 1907/2006 nor substances or mixtures meeting the criteria for classification with the hazard classes or categories specified below.

List of hazard statements and risk phrases:

GHS Hazard Statement <sup>1</sup>	EU Risk Phrase <sup>2</sup>
H300 Fatal if swallowed	R28
H301 Toxic if swallowed	R25
H304 May be fatal if swallowed and enters airways	R65
H310 Fatal in contact with skin	R27
H311 Toxic in contact with skin	R24
H330 Fatal if inhaled	R26
H331 Toxic if inhaled	R23
H340 May cause genetic defects	R46
H341 Suspected of causing genetic defects	R68
H350 May cause cancer	R45
H350i May cause cancer by inhalation	R49
H351 Suspected of causing cancer	R40
H360F May damage fertility	R60
H360D May damage the unborn child	R61
H360FD May damage fertility. May damage the unborn child	R60/61/60-61
H360Fd May damage fertility. Suspected of damaging the unborn child	R60/63
H360Df May damage the unborn child. Suspected of damaging fertility	R61/62
H361f Suspected of damaging fertility	R62
H361d Suspected of damaging the unborn child	R63
H361fd Suspected of damaging fertility. Suspected of damaging the unborn child.	R62-63
H362 May cause harm to breast fed children	R64
H370 Causes damage to organs	R39/23/24/25/26/27/28
H371 May cause damage to organs	R68/20/21/22
H372 Causes damage to organs through prolonged or repeated exposure	R48/25/24/23
H373 May cause damage to organs through prolonged or repeated exposure	R48/20/21/22
H400 Very toxic to aquatic life	R50
H410 Very toxic to aquatic life with long-lasting effects	R50-53
H411 Toxic to aquatic life with long-lasting effects	R51-53
H412 Harmful to aquatic life with long-lasting effects	R52-53
H413 May cause long-lasting effects to aquatic life	R53
EUH059 Hazardous to the ozone layer	R59
EUH029 Contact with water liberates toxic gas	R29
EUH031 Contact with acids liberates toxic gas	R31
EUH032 Contact with acids liberates very toxic gas	R32
EUH070 Toxic by eye contact	R39-41
No commercial dye formulation, colorants, surface-finishing agents, auxiliaries	R43
and coating materials shall be used on either pulp or board that has been assigned or may be assigned at the time of application the hazard statement H317: May cause allergic skin reaction.	

As provided for in Regulation (EC) No 1272/2008 of the European Parliament and of the Council

<sup>2</sup> As provided for in Council Directive 67/548/EEC

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The use of 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.

Concentration limits for substances or mixtures which may be or have been assigned the hazard statements or risk phrase listed above, meeting the criteria for classification in the hazard classes or categories, and for substances meeting the criteria of Article 57 (a), (b) or (c) of Regulation (EC) No 1907/2006, shall not exceed the generic or specific concentration limits determined in accordance with the Article 10 of Regulation (EC) No 1272/2008. Where specific concentration limits are determined they shall prevail over the generic ones.

Concentration limits for substances meeting criteria of Article 57 (d), (e) or (f) of Regulation (EC) No 1907/2006 shall not exceed 0,1% weight by weight.

This criterion refers to the chemicals products purchased and added during the production of pulp and laminating paper and board substrate.

The quantity of all consummables used in the process is required only if it's necessary to justify the sub-criterion related to concentration limits for substances meeting criteria.

# **Assessment and verification:**

The applicant shall prove compliance with the criterion providing data on the amount (kg/ADT board produced) of substances used in the process and that the substances referred to in this criterion are not retained in the final product above concentration limits specified. The concentration for substances and mixtures shall be specified in the Safety Data Sheets in accordance with Article 31 of Regulation (EC) No 1907/2006.

# b) Substances listed in accordance with article 59(1) of Regulation (EC) No 1907/2006

No derogation from the prohibition set out in point (a) Article 6(6) of Regulation (EC) No 66/2010 shall be granted concerning substances identified as substances of very high concern and included in the list provided for Article 59 of Regulation (EC) No 1907/2006, present in mixtures, in an article or in any homogenous part of a complex article in concentrations higher than 0,1%. Specific concentration limits determined in accordance with Article 10 of Regulation (EC) No 1272/2008 shall apply in case it is lower than 0,1%.

# **Assessment and verification:**

The list of substances identified as substances of very high concern and included in the candidate list in accordance with Article 59 of Regulation (EC) No 1907/2006 can be found here:

http://echa.europa.eu/chem\_data/authorisation\_process/candidate\_list\_table\_en.asp

Reference to the list shall be made on the date of application.

The applicant shall prove compliance with the criterion providing data on the amount (kg/ADT board produced) of substances used in the process and that the substances referred to in this criterion are not retained in the final product above concentration limits specified. The concentration shall be specified in the safety data sheets in accordance with Article 31 of Regulation (EC) No 1907/2006.

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The amount of substances used for the process is required only if Substances of Very High Concern are present in the products as declared by the supplier of substance.

# c) Chlorine

Chlorine gas shall not be used as a bleaching agent. This requirement does not apply to chlorine gas related to the production and use of chlorine dioxide.

# **Assessment and verification:**

The applicant shall provide a declaration from the pulp producer(s) that chlorine gas has not been used as a bleaching agent.

Note: while this requirement also applies to the bleaching of recycled fibres, it is accepted that the fibres in their previous life-cycle may have been bleached with chlorine gas.

# d) APEOs

Alkylphenol ethoxylates or other alkylphenol derivatives shall not be added to cleaning chemicals, de-inking chemicals, foam inhibitors, dispersants or coatings. Alkylphenol derivatives are defined as substances that upon degradation produce alkyl phenols.

# **Assessment and verification:**

The applicant shall provide a declaration(s) from their chemical supplier(s) that alkylphenol ethoxylates or other alkylphenol derivatives have not been added to these products.

# e) Residual monomers

The total quantity of residual monomers (excluding acrylamide) that may be or have been assigned any of the following risk phrases (or combinations thereof) and are present in coatings, retention aids, strengtheners, water repellents or chemicals used in internal and external water treatment shall not exceed 100 ppm (calculated on the basis of their solid content):

Hazard Statement <sup>1</sup>	Risk Phrase <sup>2</sup>
H340 May cause genetic defects	R46
H350 May cause cancer	R45
H350i May cause cancer by inhalation	R49
H351 Suspected of causing cancer	R40
H360F May damage fertility	R60
H360D May damage the unborn child	R61
H360FD May damage fertility. May damage the unborn child	R60/61/60-61
H360Fd May damage fertility. Suspected of damaging the unborn child	R60/63
H360Df May damage the unborn child. Suspected of damaging fertility	R61/62
H400 Very toxic to aquatic life	R50/50-53
H410 Very toxic to aquatic life with long-lasting effects	R50-53
H411 Toxic to aquatic life with long-lasting effects	R51-53
H412 Harmful to aquatic life with long-lasting effects	R52-53
H413 May cause long-lasting effects to aquatic life	R53

<sup>&</sup>lt;sup>1</sup> As provided for in Regulation (EC) No 1272/2008 of the European Parliament and of the Council

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<sup>&</sup>lt;sup>2</sup> As provided for in Council Directive 67/548/EEC



Acrylamide shall not be present in coatings, retention aids, strengtheners, water repellents or chemicals used in internal and external water treatment in concentrations higher than 700 ppm (calculated on the basis of their solid content).

The competent body may exempt the applicant from these requirements in relation to chemicals used in external water treatment.

### Assessment and verification:

The applicant shall provide provide a declaration of compliance with this criterion, together with appropriate documentation (such as Safety Data Sheets).

# f) Surfactants in de-inking

All surfactants used in de-inking shall be ultimately biodegradable

### **Assessment and verification:**

The applicant shall provide a declaration of compliance with this criterion together with the relevant safety data sheets or test reports for each surfactant which shall indicate the test method, threshold and conclusion stated, using one of the following test method and pass levels: OECD 302 A-C (or equivalent ISO standards), with a percentage degradation (including adsorption) within 28 days of at least 70 % for 302 A and B, and of at least 60 % for 302 C.

# g) Biocides

The active components in biocides or biostatic agents used to counter slime-forming organisms in circulation water systems containing fibres shall not be potentially bio-accumulative. Biocides' bioaccumulation potentials are characterised by log Pow (log octanol/water partition coefficient) <3,0 or an experimentally determined bioconcentration factor (BCF)  $\le 100$ .

## **Assessment and verification:**

The applicant shall provide a declaration of compliance with this criterion together with the relevant material safety data sheet or test report which shall indicate the test method, threshold and conclusion stated, using the following test methods: OECD 107, 117 or 305 A-E.

# h) Azo dyes

Azo dyes that may cleave to any of the following aromatic amines shall not be used, in accordance with Annex XVII to Regulation (EC) No 1907/2006:

- 1.	4-aminobiphenyl	(92-67-1),
- 2.	benzidine	(92-87-5),
- 3.	4-chloro-o-toluidine	(95-69-2),
- 4.	2-naphthylamine	(91-59-8),
- 5.	o-aminoazotoluene	(97-56-3),
- 6.	2-amino-4-nitrotoluene	(99-55-8),
- 7.	p-chloroaniline	(106-47-8),
- 8.	2,4-diaminoanisole	(615-05-4),
- 9.	4,4'-diaminodiphenylmethane	(101-77-9),
- 10.	3,3'-dichlorobenzidine	(91-94-1),
- 11.	3,3'-dimethoxybenzidine	(119-90-4),
- 12.	3,3'-dimethylbenzidine	(119-93-7),

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- 13.	3,3'-dimethyl-4,4'-diaminodiphenylmethane	(838-88-0),
- 14.	p-cresidine	(120-71-8),
- 15.	4,4'-methylene-bis-(2-chloroaniline)	(101-14-4),
- 16.	4,4'-oxydianiline	(101-80-4),
- 17.	4,4'-thiodianiline	(139-65-1),
- 18.	o-toluidine	(95-53-4),
- 19.	2,4-diaminotoluene	(95-80-7),
- 20.	2,4,5-trimethylaniline	(137-17-7),
- 21.	4-aminoazobenzene	(60-09-3),
- 22.	o-anisidine	(90-04-0).

#### **Assessment and verification:**

the applicant shall provide from their chemical supplier(s) a declaration of compliance with this criterion.

# i) Metal complex dye stuffs or pigments

Dyes or pigments based on lead, copper, chromium, nickel or aluminium shall not be used. Copper phthalocyanine dyes or pigments may, however, be used.

#### **Assessment and verification:**

The applicant shall provide from their chemical supplier(s) a declaration of compliance.

## j) Ionic impurities in dye stuffs

The levels of ionic impurities in the dye stuffs used shall not exceed the following: Ag 100 ppm; As 50 ppm; Ba 100 ppm; Cd 20 ppm; Co 500 ppm; Cr 100 ppm; Cu 250 ppm; Fe 2500 ppm; Hg 4 ppm; Mn 1000 ppm; Ni 200 ppm; Pb 100 ppm; Se 20 ppm; Sb 50 ppm; Sn 250 ppm; Zn 1500 ppm.

#### **Assessment and verification:**

The applicant shall provide a declaration of compliance with this criterion.

#### REQUIRED DOCUMENTATION FOR ASSESSMENT AND VERIFICATION

The applicant shall provide a declaration of compliance and if required (s)he provides also a safety data sheet or test report which shall indicate the test method, threshold and conclusion stated, using the test methods mentioned in the sub-criteria. See specific requirements on the assessment and verification in the a)-j)-sub-criterion of the criteria B3.

Board and pulp producers are requested to provide a list of production chemicals, along with their SDS (safety data sheets), containing:

- 1. Name (trade name and functional name)
- 2. The function of the chemical
- 3. Name of supplier/importer
- 4. The amount of chemical used (kg/ton)

A self-declaration of compliance to this criterion from chemicals suppliers can be provided to the Competent Body in form 3 Annex 4.

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# Criterion B4 - Waste management

All pulp and fibre substrate production sites shall have a system for handling waste (as defined by the relevant regulatory authorities of the pulp and substrate production sites in question) and residual products arising from the production of the eco-labelled product. The system shall be documented or explained in the application and include information on at least the following points:

- procedures for separating and using recyclable materials from the waste stream,
- procedures for recovering materials for other uses, such as incineration for raising process steam or heating, or agricultural use,
- procedures for handling hazardous waste (as defined by the relevant regulatory authorities of the pulp and board production sites in question).
- 'Recyclable materials' means fibres/paper/broke waste.
- 'Recovering materials for other uses' means non-recyclable other waste such as pallet.
- 'Handling hazardous waste' means chemicals waste.

#### **Assessment and verification:**

The applicant shall provide a detailed description of the procedures adopted for the waste management of each of the sites concerned and a declaration of compliance with the criterion.

This criterion refers to the internal instruction of sorting waste for instance.

The producer can provide its internal procedures such as procedures required in ISO 14001 standards. The ISO 14001 certificate can be provided to justify the compliance to this criterion.

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# **Criterion 2 – Fibres: Sustainable forest management**

The fibre raw material may be recycled or virgin fibre.

Virgin fibres shall be covered by valid sustainable forest management and chain of custody certificates issued by an independent third party certification scheme such as FSC, PEFC or equivalent.

However, where certification schemes allow mixing of certified material, recycled materials and uncertified material in a product or product line, the proportion of uncertified virgin material shall not exceed 30 % of the total fibre raw material.

Such uncertified material shall be covered by a verification system which ensures that it is legally sourced and meets any other requirement of the certification scheme with respect to uncertified material.

The certification bodies issuing forest and/or chain of custody certificates shall be accredited/recognised by that certification scheme.

#### Assessment and verification:

The applicant shall provide appropriate documentation indicating the types, quantities and origins of fibres used in the pulp and the board production.

Where virgin fibres are used, the product shall be covered by valid forest management and chain of custody certificates issued by an independent third party certification scheme, such as PEFC, FSC or equivalent.

If the product or product line includes uncertified material, proof should be provided that the uncertified material is less than 30 % and is covered by a verification system which ensures that it is legally sourced and meets any other requirement of the certification scheme with respect to uncertified material.

Where recycled fibres are used, the applicant shall provide a declaration stating the average amount of grades of recovered fibre/paper used for the product in accordance with the standard EN 643 or an equivalent standard.

The applicant shall provide a declaration that no mill broke (own or purchased) was used for the percentage calculation.

#### **Definitions:**

- 'origins of fibres' means recycled or virgin fibres.
- '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 from this definition 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).

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- 'Mill broke': The mill broke (own or purchased) can be added in the ecolabelled substrate. Mill broke (own or purchased) are not allowed to be used for the percentage calculation. But the fibres amount from mill broke shall not be considered as recycled fibres. Mill broke shall be considered as virgin non-certified materials. The amount of mill broke shall not exceed 30% by weight of the final fibre substrate.
- 'Certified material' refers both to the virgin fibres from certified 'forest management' or recycled fibres.
- 'Uncertified material' means virgin fibres from legal forest certified for controlled chain.

Self-declaration of compliance to the criterion 2 "Fibres: Sustainable forest Management" from the paper/board producers can be provided to the Competent Body in the Form 4 Annex 5.

# a) Evidences required for the paper substrates submitted to the criterion 1 Part A

This section applies in addition to the evidences required in the criterion 1 part A related to paper substrate i.e. EU Ecolabel certificate.

#### - Related to virgin paper:

In order to prove its compliancy, the applicant for ecolabelled converted paper product can provide for each paper raw material used one of the following evidences:

- ✓ FSC 100% certificates,
- ✓ FSC mixed credit certificates,
- ✓ FSC mixed 70% (or more) certificates,
- ✓ 70% PEFC certified (or more) certificates,
- ✓ An equivalent valid certificate for the substrate used,
- ✓ Self-declaration of compliance to this criterion from the paper producer in case the paper producer already has a valid EU Ecolabel certificate for the substrate used (see Annex 5),
- ✓ Self-declaration of compliance to this criterion on paper/board machine level from the paper/board producer, in case the producer hasn't sold the substrate with official claim based on approved certification systems (see Annex 5).

The certification bodies issuing forest and/or chain of custody certificates shall be accredited/recognised by that certification scheme.

#### - Related to recycled paper:

In order to prove its compliancy, the applicant for ecolabelled converted paper product can provide for each paper raw material used one of the following evidences:

- ✓ Self-declaration of compliance to the EN 643 (see Annex 5)
- ✓ Blue Angel certificate,
- ✓ FSC recycled credit certificate,
- ✓ FSC recycled 70% (or more) certificate,
- ✓ PEFC recycled (70% (or more) certificate,
- ✓ Or equivalent.

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# b) Evidences required for the board substrates submitted to the criterion 1 Part B

This section applies in addition to the evidences required in the criterion 1 part B related to board substrate.

This section applies to the evidences that must be provided by the producer for board/kraft paper substrate or for each laminating paper separately related to the final converted paper product for which the applicant presents an application. All following recommendations apply to the board/kraft paper production site.

#### RECOMMENDATIONS ON VIRGIN 'CERTIFIED MATERIALS'

Where certification schemes allow mixing of certified material, recycled materials and uncertified material in a product or product line, the combination of certified virgin material and recycled material shall exceed 70 % of the total fibre raw material. If only virgin fibre based pulp is used, then at least 70% of virgin pulp shall be covered by valid sustainable forest management and chain of custody certificates issued by an independent third party certification scheme such as FSC, PEFC or equivalent.

- A forest certification scheme needs to meet the following requirements:
  - SUSTAINABLE FORESTRY: It must balance economic, ecological and social interests and comply with sustainability based on internationally agreed criteria;
  - MEASURABLE: It must set absolute requirements that must be fulfilled for the certification of the forestry;
  - CONTINUES IMPROVEMENTS: It must be assessed and revised regularly to initiate process improvement and successively reduce environmental impact; and
  - TRANSPARENCY: It must be available to the general public. The standard must have been developed in an open process in which stakeholders with ecological, economic and social interests have been invited to participate.
  - NEUTRALITY: The sustainable forest management and chain of custody certificates must be issued by an independent third party certification scheme. The certification bodies issuing forest and/or chain of custody certificates shall be accredited/recognised by that certification scheme.
- A chain of custody certification system needs to meet the following requirements:
  - It must be issued by an accredited, competent third party;
  - It must assure traceability, documentation and controls throughout the production chain.

A valid FSC or PEFC certificate (see Annex 6 for more details about different certification options) can be used without any further declaration as a proof of fulfilling the requirement. If an applicant holds a certification not issued by FSC or PEFC, then the applicant will have to provide to the European Ecolabel Board (EUEB) – through the Competent Body to which (s)he intends to apply for the Ecolabel - all supporting information related to the certification scheme itself. All the documentation will then be evaluated by the EUEB to determine if equivalence of the certification scheme compared to the FSC and PEFC.

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#### RECOMMENDATIONS ON VIRGIN 'UNCERTIFIED MATERIAL'

The uncertified fibres (maximum 30% of the total) must be independently verified before it is mixed with certified material. The verification system of non-certified wood shall fulfil the following requirements<sup>1</sup>:

- Legality of wood:
- rights to harvest timber within legally gazetted boundaries;
- payments for harvest rights and timber including duties related to timber harvesting;
- timber harvesting, including environmental and forest legislation including forest management and biodiversity conservation, where directly related to timber harvesting;
- third parties' legal rights concerning use and tenure that is affected by timber harvesting;
- trade and customs legislation, in so far as the forest sector is concerned.
- Traceability:
- The applicant shall give a description of the system for tracing of fibres throughout the whole production chain from the forest/recycling site to the product.

A valid FSC or PEFC certificate (see Annex 6 for more details about different certification options) can be used without any further declaration as a proof of fulfilling the requirement. If an applicant holds a certification not issued by FSC or PEFC, then the applicant will have to provide to the European Ecolabel Board (EUEB) – through the Competent Body to which (s)he intends to apply for the Ecolabel - all supporting information related to the certification scheme itself. All the documentation will then be evaluated by the EUEB to determine if equivalence of the certification scheme compared to the FSC and PEFC.

#### RECOMMENDED DOCUMENTATION FOR ASSESSMENT AND VERIFICATION

The board/kraft paper producer shall provide detailed calculations showing compliance with this criterion, together with all related supporting documentation. The board/kraft paper producer shall provide the following documentation for each pulp or laminating paper or board/kraft paper substrate or Kraft substrate used separately:

#### All pulps:

- A declaration indicating the fibre suppliers, types, quantities and origins of fibres (virgin or recycled) used annually in the pulp and the substrate production;
- A Chain of Custody certificate may be used to document the traceability (the Chain of Custody Certificate used must meet the requirements for sustainable forest management certificates given in this document) OR A description of the system for tracing of fibres throughout the whole production chain from the forest/recycling site to the product.

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The requirements are the same than the 'applicable legislation' definition in the REGULATION (EU) No 995/2010 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 20 October 2010 laying down the obligations of operators who place timber and timber products on the market (Text with EEA relevance).



#### Recycled pulps:

- A declaration indicating the average amount of grades of recovered fiber used annually for the board/Kraft substrate in accordance with the standard EN 643 or an equivalent standard.

#### Certified virgin pulps:

- A declaration (from the fibre suppliers) of the amount of certified fibres delivered to the pulp mill and the copies of the valid certificates for the certified fibres (the forest certification scheme used must meet the requirements for sustainable forest management certificates given in this document);
- A Copy of Chain of Custody Certificate (the Chain of Custody Certificate used must meet the requirements given in this document).

## Non-certified virgin pulps:

- A declaration indicating that the uncertified material is less than 30 percent;
- A description of the traceability system for all wood and fibre raw materials;
- A documented procedure from the pulp/substrate manufacturer that describes how the requirement is fulfilled.

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# CRITERIA APPLICABLE TO CONVERTING PROCESSES

# **Criterion 3 - Excluded or limited substances and mixtures**

## a) Hazardous substances and mixtures

Consumables that could end up in the final converted paper product, and that contain substances and/or mixtures meeting the criteria for classification with the hazard statements or risk phrases specified below in accordance with Regulation (EC) No 1272/2008 or Council Directive 67/548/EEC (1) or substances referred to in Article 57 of Regulation (EC) No 1907/2006 shall not be used for printing, coating, and finishing operations of the final converted paper product.

This requirement shall not apply to toluene for use in rotogravure printing processes where a closed or encapsulated installation or recovery system, or any equivalent system, is in place to control and monitor fugitive emissions and where the recovery efficiency is at least 92 %.

UV varnishes and UV inks classified H412/R52-53 are also exempted from this requirement.

The non-paper components that are part of the final converted paper product shall not contain the substances referred to above.

A Self-declaration of compliance to the criterion 3 a) from suppliers of non-paper component should be provided to the Competent Body in Form 7 see Annex 8

'Consumables' means chemical products used during the printing, coating and finishing processes and capable of being consumed, destroyed, dissipated, wasted or spent.

Consumables meeting the criteria for classification with the hazard statements or risk phrases specified shall not be used if the concentrations of substances and/or mixtures are above the generic concentration or specific concentration.

The hazardous classification of consumables related to substance and/or mixture contained can be found in the Safety Data Sheet at the section 15 "REGULATORY INFORMATION" providing the health, safety and environmental information shown on the label or to the section 2 "HAZARDS IDENTIFICATION" giving the classification of the substance or mixture which arises from application of the classification rules in Directives 67/548/EEC or 1999/45/EC. This section 2 indicates clearly and briefly the hazards the substance or mixture presents to man and the environment. Caution: This section can mention other hazards if necessary.

The section 3 "COMPOSITION/INFORMATION ON INGREDIENTS" provides information related to substances present in the consumables but not the hazardous classification of the consumable itself. This means that section 3 cannot be used to prove the compliance with this criterion. The hazards of the preparation itself are given under heading 2. This section 3 provides information enabling the recipient to identify readily the hazards of the components of the preparation. For a preparation classified as dangerous according to Directive 1999/45/EC, the substances are indicated, together with their concentration or concentration range in the preparation if they are present in concentrations equal to or greater than the generic concentration

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limits. For a preparation not classified as dangerous according to Directive 1999/45/EC, the substances are indicated, together with their concentration or concentration range, if they are present in an individual concentration of either  $\geq 1$  % by weight for the substances presenting a health or environmental hazard; OR  $\geq 0.1$  % by weight of the substances that are persistent, bioaccumulative and toxic (PBT) or very persistent and very bioaccumulative (vPvB).

The classification of UV varnishes and UV inks classified as H412/R52-53 can be found at the section 15 of the MSDS.

'Non-paper components' means all the parts of a converted paper product that do not consist of paper, paperboard or paper based substrates.

#### List of hazard statements and risk phrases:

Hazard Statement <sup>1</sup>	Risk Phrase <sup>2</sup>
H300 Fatal if swallowed	R28
H301 Toxic if swallowed	R25
H304 May be fatal if swallowed and enters airways	R65
H310 Fatal in contact with skin	R27
H311 Toxic in contact with skin	R24
H330 Fatal if inhaled	R23 or R26
H331 Toxic if inhaled	R23
H340 May cause genetic defects	R46
H341 Suspected of causing genetic defects	R68
H350 May cause cancer	R45
H350i May cause cancer by inhalation	R49
H351 Suspected of causing cancer	R40
H360F May damage fertility	R60
H360D May damage the unborn child	R61
H360FD May damage fertility. May damage the unborn child	R60; R61; R60-61
H360Fd May damage fertility. Suspected of damaging the unborn child	R60/63
H360Df May damage the unborn child. Suspected of damaging fertility	R61/62
H361f Suspected of damaging fertility	R62
H361d Suspected of damaging the unborn child	R63
H361fd Suspected of damaging fertility. Suspected of damaging the unborn child	R62-63
H362 May cause harm to breast fed children	R64
H370 Causes damage to organs	R39/23; R39/24; R39/25;
	R39/26; R39/27; R39/28
H371 May cause damage to organs	R68/20; R68/21; R68/22
H372 Causes damage to organs through prolonged or repeated exposure	R48/25; R48/24; R48/23
H373 May cause damage to organs through prolonged or repeated exposure	R48/20; R48/21; R48/22
H400 Very toxic to aquatic life	R50
H410 Very toxic to aquatic life with long-lasting effects	R50-53
H411 Toxic to aquatic life with long-lasting effects	R51-53
H412 Harmful to aquatic life with long-lasting effects	R52-53
H413 May cause long-lasting harmful effects to aquatic life	R53
EUH059 Hazardous to the ozone layer	R59
EUH029 Contact with water liberates toxic gas	R29
EUH031 Contact with acids liberates toxic gas	R31
EUH032 Contact with acids liberates very toxic gas	R32
EUH070 Toxic by eye contact	R39-41

As provided for in Regulation (EC) No 1272/2008 of the European Parliament and of the Council.

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<sup>&</sup>lt;sup>2</sup> As provided for in Council Directive 67/548/EEC.



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.

Concentration limits for substances and mixtures which may be, or have been, assigned the hazard statements or risk phrase listed above or which meet the criteria for classification in the hazard classes or categories, and concentration limits for substances meeting the criteria of Article 57 (a), (b) or (c) of Regulation (EC) No 1907/2006, shall not exceed the generic or specific concentration limits determined in accordance with the Article 10 of Regulation (EC) No 1272/2008. Where specific concentration limits are determined, they shall prevail over the generic ones.

Concentration limits for substances meeting criteria set out in Article 57 (d), (e) or (f) of Regulation (EC) No 1907/2006 shall not exceed 0,1% weight by weight.

If a consumable contains substances meeting criteria above (e.g. a mixture classified R50/53) as mentioned at the section 2 of MSDS (in compliance to the Regulation (EC) No 1907/2006), the generic concentration limit or the specific concentration limit is exceeded if the risk phrase targeted is also mentioned at the section 15.

#### **Assessment and verification:**

For substances not already classified in accordance with Regulation (EC) No 1272/2008, the applicant shall prove compliance with these criteria by providing: (i) a declaration that the non-paper components that are part of the final product do not contain the substances referred to in these criteria in concentration above the authorised limits; (ii) a declaration that consumables that could end up in the final converted paper product and used for printing, coating, and finishing operations do not contain the substances referred to in these criteria in concentration above the authorised limits; (iii) a list of all consumables used for the printing, finishing and coating of the converted paper products. This list shall include the quantity, function and suppliers of all the consumables used in the production process.

The applicant shall demonstrate compliance with this criterion by providing a declaration on the non-classification of each substance into any of the hazard classes associated to the hazard statements referred to in the above list in accordance with Regulation (EC) No 1272/2008, as far as this can be determined, as a minimum, from the information meeting the requirements listed in Annex VII to Regulation (EC) No 1907/2006. This declaration shall be supported by summarised information on the relevant characteristics associated to the hazard statements referred to in the above list, to the level of detail specified in Sections 10, 11 and 12 of Annex II to Regulation (EC) No 1907/2006 (Requirements for the Compilation of Safety Data Sheets).

Information on intrinsic properties of substances may be generated by means other than tests, for instance through the use of alternative methods such as *in vitro* methods, by quantitative structure activity models or by the use of grouping or read-across in accordance with Annex XI to Regulation (EC) No 1907/2006. The sharing of relevant data is strongly encouraged.

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The information provided shall relate to the forms or physical states of the substance or mixtures as used in the final product.

For substances listed in Annexes IV and V to REACH, exempted from registration obligations under Article 2(7)(a) and (b) of Regulation (EC) No 1907/2006 REACH, a declaration to this effect will suffice to comply with the requirements set out above.

The applicant shall provide appropriate documentation on the recovery efficiency of the closed/encapsulated installation/recovery system, or any equivalent system, that has been put in place to deal with the use of toluene in rotogravure printing processes.

In order to demonstrate that the recovery efficiency of the closed/encapsulated installation/recovery system, or any equivalent system, is at least 92%, the rotogravure printer shall provide the last years calculation of the solvent management plan.

Please note that the calculation method is laid down in part 7 (Solvent management plan) of Annex VII of Directive 2010/75/EU, of 24 November 2010, on industrial emissions (Integrated pollution prevention and control).

Sub criterion 2(a) only applies to consumables that could end up in the final converted paper product. Thereby, as washing agents don't end up in the final converted paper product, they are not covered by this requirement.

The quantity of all consummables used in the production process is required only if it's necessary to justify the sub-criterion related to concentration limits for substances meeting criteria.

# b) Substances listed in accordance with article 59 of Regulation (EC) No 1907/2006

No derogation from the prohibition set out in Article 6(6) of Regulation (EC) No 66/2010 shall be granted concerning substances identified as substances of very high concern and included in the list provided in Article 59 of Regulation (EC) No 1907/2006, present in mixtures in concentrations higher than 0,1%. Specific concentration limits determined in accordance with Article 10 of Regulation (EC) No 1272/2008 shall apply where the concentration is lower than 0,1%.

#### Assessment and verification:

The applicant shall provide the list of substances identified as substances of very high concern and included in the candidate list in accordance with Article 59 of Regulation (EC) No 1907/2006, which can be found here:

http://echa.europa.eu/chem\_data/authorisation\_process/candidate\_list\_table\_en.asp

Reference to the list shall be made on the date of application.

The applicant shall prove compliance with this criterion by providing data on the amount of substances used for the printing of the converted paper products and a declaration stating 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.

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The amount of substances used for the printing is required only if Substances of Very High Concern are present in the products as declared by the supplier of substance.

#### c) Biocides

Biocides, either as part of the formulation or as part of any mixture included in the formulation, that are used to preserve the product and that are classified H410/R50-53 or H411/R51-53 in accordance with Directive 67/548/EEC, Council Directive 1999/45/EC or Regulation (EC) No 1272/2008, are permitted only if their bioaccumulation potentials are characterised by log Pow (log octanol/water partition coefficient) < 3,0 or an experimentally determined bioconcentration factor (BCF)  $\leq$  100.

#### **Assessment and verification:**

The applicant shall provide copies of the material safety data sheets for all biocides used during the different production stages, together with a documentation of the concentrations of the biocides in the consumable.

This criterion applies only to chemicals products purchased and used by the applicant to preserve the chemicals products used during the process.

Documentation regarding log Pow or BCF shall be provided to the Competent Body, on either the Material Safety Data Sheet or by a separate test report.

# d) Washing agents

Washing agents used for cleaning in printing processes and/or sub-processes that contain aromatic hydrocarbon shall only be allowed if they are in compliance with point 3(b) and if one of the following conditions is fulfilled:

- (i) The amount of aromatic hydrocarbons in the washing agent products used does not exceed 0.1 % (w/w):
- (ii) The amount of aromatic hydrocarbon-based washing agent used annually does not exceed 5 % of the total amount of washing agent used in one calendar year.

This criterion shall not apply to toluene used as washing agent in rotogravure printing.

#### **Assessment and verification:**

The applicant shall provide the Safety Data Sheet for each washing agent used in a printing house during the year to which the annual consumption refers. The washing agent suppliers shall provide declarations of the aromatic hydrocarbon contents in the washing agents.

This criterion applies only to the washing agents used during the printing process.

'Washing agents' means chemicals used to wash printing forms and printing presses to remove printing inks, paper dust and similar products; cleaners for finishing machines and printing machines; printing inks removers used in washing off dried printing inks.

- (i) According to the Safety Data Sheet provided by the washing agent suppliers, the applicant can provide declarations of the aromatic hydrocarbon contents in the washing agents.
- (ii) The amount of aromatic hydrocarbon-based washing agent used annually shall be proved by the applicant or its subcontractors of printing. This point (ii) can be

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calculated only if the amount of aromatic hydrocarbons in the washing agent products used exceed 0.1 % (w/w).

# e) Alkyl phenol ethoxylates – Halogenated solvents – Phthalates

The following substances or preparations shall not be added to inks, dyes, toners, adhesives, or washing agents or other cleaning chemicals used for the printing of the converted paper product:

- Alkyl phenol ethoxylates and their derivatives that may produce alkyl phenols by degradation.
- Halogenated solvents that at the time of application are classified in the hazard or risk categories listed in point 3(a).
- Phthalates that at the time of application are classified with risk phrases H360F, H360D, H361f in accordance with Regulation (EC) No 1272/2008.

#### **Assessment and verification:**

The applicant shall provide a declaration of compliance with this criterion.

# f) Printing inks, toners, inks, varnishes, foils and laminates

The following heavy metals or their compounds shall not be used in printing inks, toners, inks, varnishes, foils and laminates (whether as a substance or as part of any preparation used): cadmium, copper (excluding copper-phthalocyanine), lead, nickel, chromium VI, mercury, arsenic, soluble barium, selenium, antimony. Cobalt can only be used up to 0,1 % (w/w).

Ingredients may contain traces of those metals up to 0,01 % (w/w) deriving from impurities in the raw materials.

#### Assessment and verification:

The applicant shall provide a declaration of compliance with this criterion as well as declarations from ingredient suppliers.

#### REQUIRED DOCUMENTATION FOR ASSESSMENT AND VERIFICATION FOR SUB-CRITERION A) TO F)

The applicant shall provide a declaration of compliance and if required, he provides also a safety data sheet or test report which shall indicate the test method, threshold and conclusion stated, using the test methods mentioned in each sub-criterion. See specific requirements on the assessment and verification in the a) to f) sub-criterion of the criterion 3.

Information on the consumables used for printing, coating and finishing of the converted paper product should be provided to the Competent Body in Form 5 see Annex 7, if required along with their SDS (safety data sheets).

A Self-declaration of compliance to the criterion 3 from the chemicals suppliers of consummables used for printing, coating and finishing of the converted paper product should be provided to the Competent Body in Form 6 see Annex 7.

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<sup>&#</sup>x27;Halogenated organic solvent' means an organic solvent which contains at least one atom of bromine, chlorine, fluorine or iodine per molecule;



# g) Metal components

Metals shall not be coated with cadmium, chromium, nickel, zinc, mercury, lead, tin and their compounds.

The surface treatment of metal surfaces with nickel or zinc can be accepted for small parts (such as rivet, eyelet, and flat bar mechanisms) where this is necessary due to heavy physical wear.

Both nickel plating and zinc galvanisation shall make use of wastewater treatment, ion exchange technology, membrane technology or equal technology in order to recycle the chemical products as much as possible.

Emissions from surface treatment shall be recycled and destroyed. The system shall be closed without drainage, with an exception for zinc where the emission can be a maximum of 0,50 mg/l.

The chemical products used in the surface treatment must be in compliance with the criteria 3 (c) Biocides and 3 (e) Alkyl phenol ethoxylates — Halogenated solvents — Phthalates.

This requirement applies to each separate metal-type component exceeding 10 % by weight of the final products in the subcategory of suspension file, folders with metal fastener, ring binder and lever arch file.

#### **Assessment and verification:**

The applicant shall provide a declaration of compliance with this criterion.

This criterion applies only to final products where each separate metal-type component exceeding 10 % by weight of products in the following subcategory:

- suspension file,
- folders with metal fastener,
- ring binder and lever arch file.

The exercise books, note books, diaries, pads, paper folders, filing boxes, three flap folders and sorters and part files are excluded from this criterion.

'Each separate metal-type component' means all individual components purchased separately and assembled during the process. In case of a separate metal-type component exceeding 10% by weight of the final product, it can be exempted from the prohibition of nickel or zinc treatment if it is a small metal part such as rivets, eyelets, flat bar or flat bar mechanisms, finger hole ring, edge protection, etc. 'Small metal part' means component with a small size.

All other metal-type components which are above 10% separately by weight of the final product such as metal components of ring mechanisms or lever mechanisms and metal components of metal spring or metal fasteners shall be in compliance with the whole criterion g).

The applicant shall provide the list of each separate metal-type component. This list includes weight, percentage.

A Self-declaration of compliance to the criterion 3 g) from suppliers of non-paper component should be provided to the Competent Body in Form 7 see Annex 8

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# **Criterion 4 - Recyclability**

The converted paper product shall be recyclable. The non-paper components of the converted paper product shall be easily removable to ensure that those components will not hinder the recycling process.

- (a) Wet strength agents may be used only if the recyclability of the finished product can be proved.
- (b) Non-soluble adhesives may be used only if their removability can be proved.
- (c) Coating varnishes and lamination, including polyethene and/or polyethene/polypropylene, may be used only for binders, folders, exercise books, notebooks and diaries.

A self-declaration on the wet strength agent absence in the substrate can be provided in the Form 4 Annex 5 from the paper/board suppliers.

#### **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:

Parameter	Test method
Wet strength agents	PTS method PTS-RH 021/97 or equivalent test methods
Non-soluble adhesive removability	INGEDE Method 12 or equivalent

Testing must be performed on a final product representative of the worst case reference if Wet strength agents, non-soluble adhesives and coating varnishes and lamination are used in the product.

Please note that 'INGEDE Method 12' (Assessment of the Recyclability of Converted paper products – Testing of the Fragmentation Behaviour of Adhesive Applications), June 2009, applies only for non-soluble adhesives application and intends to measure the success of mechanical screening. Thereby, water-based adhesives don't need to be tested.

As long as a test on solubility is not available, the INGEDE test must be done for all adhesives except if the supplier declares that the adhesive concerned is considered as soluble regarding its own characteristics.

Score	Particle size	Conclusions
71 to 100 points	> 2000 µm	Conform
0 to 70 points	100 μm to 2000 μm	Not conform
	1 μm to 100 μm	Not conform
	< 1 µm	Conform
$\leq$ 0 point		The behaviour of particles could not disrupt the
		recycling due to their capacity to be eliminated
		with water flow.

Moreover, in case of test result lower to 0 point (negative value), the adhesive may be considered as conform if the supplier can prove that the size of particle is lower than 100 µm.

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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.

The applicant shall provide a declaration that coated and laminated converted paper products, if used in the reference product, are in compliance with criterion 3(c).

The term 'coating varnish' covers the following varnishes: water-based varnishes, oil-based varnishes and UV-varnishes.

Where a part of a converted paper product is easily removable (for instance a metal bar in a suspension file or a plastic cover or a reusable exercise book cover), the recyclability test may be made without this component.

The easiness of removal of the non-paper components shall be proven via a declaration of the paper collecting company, the recycling company or an equivalent organisation. Test methods shown by a competent and independent third party as giving equivalent results may also be used.

The applicant can provide a declaration showing the easiness of removal of the non-paper components by referring to the technical knowledge of characteristics of its products.

A self-declaration of compliance to this criterion form the applicant can be provided to the Competent Body in the Form 8 annex 9.

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#### **Criterion 5 - Emissions**

#### (a) Emissions to water

Rinsing water containing silver from film processing, as well as from plate production, and photochemicals shall not be discharged to a sewage treatment plant.

#### **Assessment and verification:**

The applicant shall provide a declaration of compliance with this criterion, together with a description of the management of photo-chemicals and silver containing rinsing water on site. Where the film processing and/or the plate production are outsourced, the sub-contractor shall provide a declaration of compliance with this criterion, together with a description of the management of photo-chemicals and silver containing rinsing water at the subcontractors.

In **Rotogravure printing**, the amount of Cr and Cu discharged into a sewage treatment plant must not exceed, respectively, **45** mg per m2 and **400** mg per m2 of printing cylinder surface area used in the press.

#### **Assessment and verification:**

The discharges of Cr and Cu into the sewage shall be checked at rotogravure printing plants after treatment and before their release. A representative sample of Cr and Cu discharges shall be collected each month. At least one annual analytical test shall be carried out by an accredited laboratory to determine the content of Cr and Cu in a representative sub-sample of these samples.

Please note that rotogravure printers which concentrate their chromium-containing waste water by evaporation and therefore do not discharge any chromium into the sewage system are excluded from the requirement concerning chromium measurements and chromium calculations.

Compliance with this criterion shall be assessed by dividing the content of Cr and Cu, as determined by the annual analytical test, by the cylinder surface used in the press during the printing.

Representative samples of Cr and Cu discharges shall be collected each month, stored and after twelve months, mixed proportionally together. An accredited laboratory should determine the content of Cr and Cu of the mixed waste water.

The reference test methods to be used are:

Parameter	Test method
Cr	EN ISO 11885 (Water quality. Determination of selected elements by inductively coupled
	plasma optical emission spectrometry (ICP-OES)
	EN 1233 (Water quality. Determination of chromium. Atomic absorption spectrometric
	methods)
Cu	EN ISO 11885 (Water quality. Determination of selected elements by inductively coupled
	plasma optical emission spectrometry (ICP-OES)

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The Cr and Cu concentration determined in the last analytical test by an accredited laboratory, is multiplied by the waste water amount discharged into the sewage, which will lead to the yearly amount of Cr and Cu sent to the sewage.

This amount is divided by the galvanized cylinder surface area produced for all print jobs in the year.

The cylinder surface used in the press during printing is calculated by multiplying the cylinder surface (=  $2\pi rL$ , where r is the radius and L the length of the cylinder) by the number of printing productions during a year (= number of different printing jobs).

Please note that the calculation of the total surface is complex because in rotogravure printing, the length and radius of the produced cylinders for print jobs is selectable. Therefore, the result obtained by multiplying the total surface area of an average cylinder set by the number of print jobs in the last year could also be accepted.

#### (b) Emissions to air

'Volatile Organic Compounds' (VOC) means any organic compound as well as the fraction of creosote, having at 293,15 K a vapour pressure of 0,01 kPa or more, or having a corresponding volatility under the particular conditions of use.

Volatile Organic Compounds (VOC)

The following criterion must be met:

$$(P_{VOC} - R_{VOC})/P_{paper} < 5 \text{ [kg/tonnes]}$$

Where:

P<sub>VOC</sub> = the annual total kilograms of VOC contained in the purchased chemical products used for the annual total production of converted products

 $R_{VOC}$  = the annual total kilograms of VOC destroyed by abatement, recovered from printing processes and sold, or reused

 $P_{\text{paper}}$  = the annual total tonnes of paper purchased and used for the production of converted products.

Where a printing/converting house uses different printing technologies, this criterion shall be fulfilled for each one separately.

The P<sub>VOC</sub> term shall be calculated from SDS information related to VOC content or from an equivalent declaration provided by the supplier of chemical products.

The  $R_{VOC}$  term shall be calculated from the declaration on the content of VOC contained in the chemical products sold or from the internal counting register (or any other equivalent document) reporting the annual amount of VOC recovered and reused on site.

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Specific conditions for heat-set printing:

(i) For heat-set offset printing with an integrated after-burner unit in place for the drying unit, the following calculation method shall apply:

 $P_{VOC} = 90\%$  of the annual total kilograms of VOC contained in damping solutions used for the annual production of converted products + 85% of the annual total kilograms of VOC contained in washing agents used for the annual production of convertes products.

(ii) For heat-set offset printing, without an integrated after-burner unit in place for the drying unit, the following calculation method shall apply:

 $P_{VOC}$  = 90 % of the annual total kilograms of VOC contained in damping solutions used for the annual production of converted products + 85% of the annual total kilograms of VOC contained in washing agents used for the annual production of converted products + 10% of annual total kilograms of VOC contained in the printing inks used for the annual production of converted products.

For (i) and (ii), proportionately lower percentages than 90% and 85% may be used in this calculation if more than 10% or 15% respectively of annual total kilograms of VOC contained in the damping solutions or washing agents used for the annual production of converted products are shown to be abated in the treatment system for combusting gases from the drying process.

#### **Assessment and verification:**

A declaration of the VOC content in alcohols, washing agents, inks, damping solutions or other corresponding chemical products shall be provided by the chemical supplier. The applicant shall provide evidence of the calculation according to the criteria laid down above. The period for the calculations shall be based on the production during 12 months. In case of a new or a rebuilt production plant, the calculations shall be based on at least three months of representative running of the plant.

 $P_{paper}$  refers to the annual total tonnes of paper purchased and used / consumed for the production of converted products.

P<sub>VOC</sub> = the annual total kilograms of VOC contained in the purchased chemical products used / consumed for the annual total production of converted products

Specific conditions concerning 'heat-set printing' were established taking into account the following:

- VOC contained in damping solutions is very highly volatile. Therefore, it is assumed that 90% of those evaporate during printing processes and only 10% are destroyed in the 'emission control system'.
- Washing agents are mixed with water in the printing machine and VOC contained in those washing agents are collected directly in the printing machine. Therefore, only 15% of VOC contained in washing agents reaches the 'emission control system' and are destroyed there.
- In machines with an integrated afterburner unit, it is assumed that 100% of VOC contained in the printing inks is destroyed, as the automatic temperature regulation ensures that the production process stop if the abatement system fails.
- In machines without an integrated afterburner (external afterburner), it is assumed that VOC contained in the printing inks are not completely destroyed. In this case, is therefore assumed that only 90% of VOC contained in the printing inks is destroyed, because there is a risk of a failure in the external afterburner that will not enable the automatically stop of the

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#### CONVERTED PAPER PRODUCT USER'S MANUAL (Commission Decision 2014/256/EU)

production process, which will result in VOC emissions that are not abated in the treatment system.

- R<sub>VOC</sub> corresponds to the VOC contained in the solvent that is collected and disposed as waste.

#### Please note that:

- P<sub>VOC</sub> term shall be calculated from SDS information related to VOC content or from an equivalent declaration provided by the supplier of the consumable.
- R<sub>VOC</sub> term shall be calculated from the declaration on the VOC contained in the consumable sold or from the internal counting register (or any equivalent document) reporting the annual amount of VOC recovered and reused on site.

Self-declaration of compliance to this criterion from the chemicals suppliers of consumables containing VOC and used for printing, coating and finishing of the converted paper product can be provided to the Competent Body in the Form 6 annex 7.

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#### Criterion 6 - Waste

# (a) Waste management

The facility where the converted paper products are produced shall have in place a system for handling waste, including residual products derived from the production of the converted paper products, as defined by local and national relevant regulatory authorities.

The system shall be documented or explained and shall include information on at least the following procedures:

- (i) handling, collection, separation and use of recyclable materials from the waste stream,
- (ii) precovery of materials for other uses, such as incineration for raising process steam or heating, or agricultural use,
- (iii) handling, collection, separation and disposal of hazardous waste, as defined by the relevant local and national regulatory authorities.

#### **Assessment and verification:**

The applicant shall provide a declaration of compliance with this criterion, together with a description of the procedures adopted for waste management. Where appropriate, the applicant shall provide the corresponding declaration to the local authority every year. Where the waste management is outsourced, the sub-contractor shall provide a declaration of compliance with this criterion as well.

This criterion refers to the internal instruction of sorting waste for instance.

The applicant can provide its internal procedures such as procedures required in ISO 14001 standards. The ISO 14001 certificate can be provided to justify the compliance to this criterion.

# (b) Waste paper

The amount of waste paper 'X' produced not exceed:

- 20% for envelopes
- 20% for stationery products
- 10% for paper bags

Where, X = annual kilos of waste paper produced during the converting (including finishing processes) of the ecolabelled converted paper product, divided by annual tonnes of paper purchased and used for the production of ecolabelled converted paper product.

Where the printing house carries out finishing processes on behalf of another printing house, the amount of waste paper produced in those processes shall not be included in the calculation of 'X'.

Where the finishing processes are outsourced to another company, the amount of waste paper resulting from the outsourced work shall be calculated and declared in the calculation of 'X'.

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'Waste paper' means paper generated during the production of finished converted paper product and which does not form part thereof.

#### **Assessment and verification:**

The applicant shall provide a description of the calculation of the amount of waste paper from the production of the ecolabelled converted paper product, together with a declaration from the contractor collecting the waste paper from the printing house.

The outsourcing terms and calculations on the amount of paper waste involved in the finishing processes shall be provided. The period for the calculations shall be based on the production during 12 months. In case of a new or a rebuilt production plant, the calculations shall be based on at least three months of representative running of the plant.

Alternatively, the applicant may provide calculations regarding the total amount of waste paper produced annually in the production/converting site, and declare that these results can be assumed as valid for the EU Ecolabelled production.

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# Criterion 7 - Energy use

The printing/converting house shall establish a register of all energy consuming devices (including machinery, lighting, air conditioning, cooling) and a programme consisting of measures for improvement of energy efficiency.

#### **Assessment and verification:**

The applicant shall provide the register of energy consuming devices together with the improvement programme.

#### REQUIRED DOCUMENTATION FOR ASSESSMENT AND VERIFICATION

Examples of the most relevant 'energy consuming devices' include:

- Printing machines;
- Finishing equipment;
- Systems for transport of waste paper;
- Ventilation systems;
- Cooling systems;
- Heating systems;
- Process air systems.

The reason concerning the choice of the relevant energy consuming devices shall be presented to the Competent Body.

# **Criterion 8 - Training**

All members of staff participating in day-to-day operation shall be given the knowledge necessary to ensure that the Ecolabel requirements are fulfilled and continuously improved.

#### **Assessment and verification:**

The applicant shall provide a declaration of compliance with this criterion, together with details of the training programme, its content, and an indication of which staff have received what training and when. The applicant shall provide to the Competent Body also a sample of training material.

The 'training programme' can either be done internally or by an external body, and should be applicable to the staff and to the departments considered as relevant to the fulfilment of the EU Ecolabel criteria.

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#### Criterion 9 - Fitness for use

The product shall be suitable for its purpose.

#### **Assessment and verification:**

The applicant shall provide appropriate documentation in compliance with this criterion. National or commercial standards, where relevant, may be used by the applicant to prove the fitness for use of the converted paper products.

For paper carrier bags, the reference test method is EN 13590:2003.

Alternatively, the applicant can prove the fitness for use of the converted paper products by presenting:

- The conditions of sales of its company, setting out the terms of the contract between the
  producer and its customers, namely the parts describing the quality of the converted paper
  product.
- Standard referring to quality test.
- Internal check production procedures.
- A valid ISO 9001 certificate issued by a certification body and respective record of complaints required by the ISO 9001 standard specification.

# Criterion 10 - Information on the product paper carrier bags

The following information shall appear on the paper carrier bags:

'Please reuse this bag'

#### **Assessment and verification:**

The applicant shall provide a sample layout of the paper carrier bag bearing the information required.

Alternatively, the applicant can provide a draft on how and where the text '"Please reuse this bag" will appear.

No alternative to the quoted text shall be accepted by the Competent Body.

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# **Criterion 11 - Information appearing on the EU Ecolabel**

The optional label with text box shall contain the following text:

- This product is recyclable.
- Emissions of chemicals to air and water of paper production, printing and converting processes have been limited.

In order to avoid the risk of providing confusing messages to consumers between an EU ecolabelled bag and its non EU ecolabelled contents, paper carrier bags shall be designed to be open and to be filled either at the point of purchase or afterwards so that consumers understand that the EU Ecolabel is only valid for the paper carrier bag, and not for the goods added. The EU Ecolabel logo displayed on the bag shall bear the following text 'EU Ecolabelled paper carrier bag'.

The guidelines for the use of the optional label with the text box can be found in the "Guidelines for use of the Ecolabel logo" on the website:

http://ec.europa.eu/environment/ecolabel/promo/pdf/logo%20guidelines.pdf

#### **Assessment and verification:**

the applicant shall provide a sample of the converted paper product showing the label, together with a declaration of compliance with this criterion.

Alternatively, the applicant can provide a draft on how the EU Ecolabel will appear on or in the converted paper product and indicate how the license number will appear.

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#### List of Annexes

#### Annexes related to Criterion 1. Substrate: all PARTS (to both Paper / Board producers):

- Annex 1. Form 1: Information on the substrate paper and/or board used for converted paper products
- Annex 2: Examples of Calculations of COD emissions
  - Example 1: Calculation of emission points for a non-integrated substrate mill.
  - Example 2: Calculation of the allocation of S and NOx emissions between heat and electricity production.
- Annex 3. Form 2: Information on emission data
- Annex 4. Form 3: Self-declaration of compliance to the criterion B3 Excluded or limited substances and mixtures from chemicals suppliers
- Annex 5. Form 4: Self-declaration of compliance to the criterion 2 "Fibres: Sustainable forest Management" from the paper/board producers.
- Annex 6. Types of certificates

#### Annexes related to applicant (Criteria 3 to 11):

- Annex 7. Form5: Information on the consumables used for printing, coating and finishing of the converted paper product
  - Form 6: Self-declaration of compliance to the criterion 3 from the chemicals suppliers of consummables used for printing, coating and finishing of the converted paper product.
- Annex 8. Form7: Self-declaration of compliance to the criterion 3 a) and g) from suppliers of non-paper component.
- Annex 9. Form8: Self-declaration of compliance to the criteria from the applicant.

#### Annexes related to sub-contractors of converting process:

Annex 10. Form 9: Self-declaration of compliance to the criteria from the sub-contractors of converting process.

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# A) Annexes related to Criterion 1. Substrate: all PARTS (to both Paper / Board producers):

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# ANNEX 1

# Form 1: Information on the paper and/or board substrates used for converted paper products

Applicant: Date:			
	<b>Applicant:</b>	Date:	

Paper/board Suppliers names (Producer / Importer)	Paper/board substrate Trade name	Weight (g/m²)	Origin of fibres (virgin or recycled)	ECOLABEL registration number (for paper substrate only)	Validity of the EU ECOLABEL certificate (for paper substrate only)	FSC/PEFC registration number	Validity of the FSC/PEFC certificate

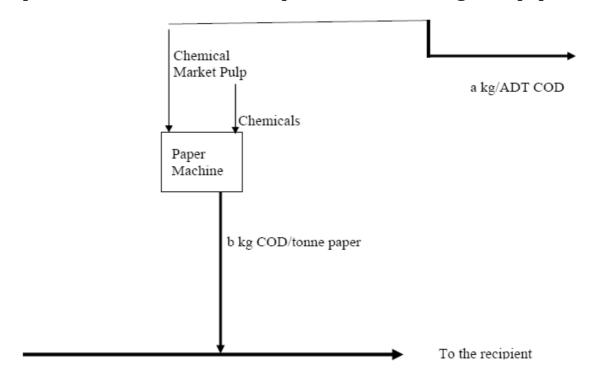
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#### **ANNEX 2**

# Examples of Calculations of COD emissions

# Example 1: Calculation of emission points for a non-integrated paper mill



 $a = COD \ emission \ for \ the \ purchased \ market \ pulp \ kg/ADT$   $b = COD \ emission \ from \ the \ paper \ production \ kg/tonne \ paper$ 

Figure 1. Rowchart of the productive process considered for the calculation

A coated paper product that will be ecolabelled is produced at a non-integrated paper mill. The used pulp is purchased Kraft market pulp. See figure 1.

#### The paper product contains:

- 10.3% filler and coatings
- 85% Kraft Pulp, ADT (90% dry matter content)
- The moisture content of the paper is 5%

The measured and therefore known emissions of COD from the productions of the pulp and the paper are:

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Kraft Pulp: 24 kg COD/ADT

• Paper production: 1.2 kg COD/tonne paper

#### COD emission point is calculated with the following formula:

$$P_{COD} = \frac{COD_{total}}{COD_{ref,total}} = \frac{\sum_{i=1}^{n} [pulp, i \times (COD_{pulp,i})] + COD_{papermachine}}{\sum_{i=1}^{n} [pulp, i \times (COD_{ref,pulp,i})] + COD_{ref,papermachine}}$$

$$\begin{aligned} \textbf{COD}_{\text{total}} &= (\text{pulp}_i * \text{COD}_{\text{pulp},i})_+ \text{COD}_{\text{papermachine}} \\ &= (\text{pulp}_i * 24 \text{ COD kg/t Kraft pulp, 90\% drymatter}) + 1.2 \text{ kg COD/tonne paper} \\ &= (a * 95/90 * 24) + b \\ &= (0.85 * 95/90 * 24) + 1.2 \\ &= 22.7 \text{ kg COD/moist paper} \end{aligned}$$

**COD** ref, total = 
$$(COD_{ref, craft pulp} * pulp_i) + COD_{ref papermachine}$$
  
=  $(pulp_i * 18 \text{ kg/t Kraft pulp, } 90\% \text{ drymatter}) + 1 \text{ kg/t paper}$   
=  $(0.4 * 95/90 * 18) + 1$   
=  $16.2 \text{ kg COD}_{ref}/\text{moist paper}$ 

Using the following reference values from Table 1:

 $COD_{ref cellulose pulp}$  = 18 kg/tonne 90 % pulp  $COD_{ref papermachine}$  = 1 kg/tonne paper

$$\mathbf{P_{COD}}$$
 = COD <sub>ref, total</sub> /COD <sub>total</sub>  
= 22.7 / 16.2  
= 1.3 < 1.5

The requirement for COD is met

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# Example 2: Calculation of the allocation of S and NOx emissions between heat and electricity production.

At a non-integrated Kraft pulp mill is produced 250 000 ADT/year.

The production of steam in the recovery boiler is 3 000 000 GJ/year The measured S emission from recovery boiler is 130 tonne /year The measured NOx emission from the recovery boiler is 400 tonne/year

The production steam in auxiliary boilers is 650 000 GJ/year The emission of S from the auxiliary boilers is 150 GJ/year The emission of NOx from the auxiliary boilers is 180 GJ/year

The amount of produced electricity is 150 GWh/year

80 000 GJ heat/year is sold out to other enterprises

Total production of the steam is 3 650 000 GJ/year = 1014 GWh (net heat)

The total emission of S is 280 tonnes/year The total emission of NOx is 580 tonnes/year

The share of the electricity is:  $2 \times 150/(2 \times 150 + 1014) = 0.23 = 23\%$ 

Then S emissions related to the electricity production are  $0.23 \times \square 280 = 64.4$  tonne

Selectricity = 0.43 tonne/GWh

Sheat = 0.21 tonne/GWh

The amount of heat used for the pulp production:  $3\,650\,000 - 80\,000=3\,570\,000\,\text{GJ/year} = 992\,\text{GWh}$   $0.21 \times 992 = 208\,\text{tonne S/year} = \textbf{0.83 kg S/tonne pulp}$ 

The NOx emissions related to the electricity production are  $0.23 \times \square 580 = 133$  tonne

NOxelectricity = 0.87 tonne/GWh

NOxheat = 0.44 tonne/GWh

 $0.44 \times 992 = 438$  tonne NOx/year = 1.8 kg NOx/tonne pulp

When the steam consumption and the related emissions of S and NOx in the pulp and paper production are known the emission points for S and NOx can be calculated. For the calculation principles see the calculation of COD points in the examples 1-2.

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# ANNEX 3

Form 2: Information on emission data

# Information on emission data

Table	1 a.									
PROD	UCER						DATE			
	Puln/Paper	COD	Sampling	Test method	'P	Sampling	Test method	ΔΟΧ	Sampling	Test m

Pulp/Paper	COD kg/ADT or Kg/tonne paper	Sampling frequency	Test method	kg/ADT or Kg/tonne paper	Sampling frequency	Test method	AOX lkg/ADT or lKg/tonne lpaper	Sampling frequency	Test method
1.	1 1								
2.									
3.									
4.									
5.									
6.									
7.									
8.									
9.									
10.									

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Chemicals Supplier's name:

**Chemicals names:** 

**Chemicals function:** 

# **ANNEX 4**

Form 3: Self-declaration of compliance to the criterion B3 Excluded or limited substances and mixtures from chemicals suppliers

Ecolabe	l for converted paper products (2	014/256/EU).		vard of the EU
Date	Name & First name	Fonction	Signature &	Company Stamp
	REQUIR	REMENTS		Compliancy
Substances	REQUIF SVHC in accordance with Article 59(1)			Compliancy
Please, precis	<b>SVHC</b> in accordance with Article 59(1) see the list of substances identified as in accordance with Article 59 of Regu	of Regulation (EC) No 1907/2006 substances of very high concern lation (EC) No 1907/2006. The c	oncentration shall be	Compliancy
Please, precis	SVHC in accordance with Article 59(1) see the list of substances identified as in accordance with Article 59 of Regular safety data sheets in accordance with	of Regulation (EC) No 1907/2006 substances of very high concern lation (EC) No 1907/2006. The c	oncentration shall be o 1907/2006.	Compliancy
Please, preciscandidate list specified in the	SVHC in accordance with Article 59(1) see the list of substances identified as in accordance with Article 59 of Regular safety data sheets in accordance with	of Regulation (EC) No 1907/2006 substances of very high concern lation (EC) No 1907/2006. The c	oncentration shall be o 1907/2006.	Compliancy
Please, precise andidate list specified in the APEOs	SVHC in accordance with Article 59(1) see the list of substances identified as in accordance with Article 59 of Regular safety data sheets in accordance with	of Regulation (EC) No 1907/2006 substances of very high concern lation (EC) No 1907/2006. The c n Article 31 of Regulation (EC) No ease, provide the valid Material	oncentration shall be o 1907/2006.  Safety Data Sheets.	Compliancy
Please, precise candidate list specified in the APEOs Alkylphenol inking chem	SVHC in accordance with Article 59(1) see the list of substances identified as in accordance with Article 59 of Regular safety data sheets in accordance with Plant Plan	of Regulation (EC) No 1907/2006 substances of very high concern lation (EC) No 1907/2006. The case, provide the valid Material vatives shall not be added to clear coatings. Alkylphenol derivatives	oncentration shall be o 1907/2006.  Safety Data Sheets.  aning chemicals, de-	Compliancy
Please, preciscandidate list specified in the APEOs Alkylphenol inking chem	SVHC in accordance with Article 59(1) see the list of substances identified as in accordance with Article 59 of Regular safety data sheets in accordance with Platethoxylates or other alkylphenol derivations, foam inhibitors, dispersants of at upon degradation produce alkyl phenol	of Regulation (EC) No 1907/2006 substances of very high concern lation (EC) No 1907/2006. The car Article 31 of Regulation (EC) No ease, provide the valid Material vatives shall not be added to clear coatings. Alkylphenol derivations.	oncentration shall be o 1907/2006.  Safety Data Sheets.  aning chemicals, deives are defined as	Compliancy
Please, preciscandidate list specified in the APEOs Alkylphenol inking chem substances the	SVHC in accordance with Article 59(1) see the list of substances identified as in accordance with Article 59 of Regular safety data sheets in accordance with Platethoxylates or other alkylphenol derivations, foam inhibitors, dispersants of at upon degradation produce alkyl phenol	of Regulation (EC) No 1907/2006 substances of very high concern lation (EC) No 1907/2006. The case, provide the valid Material vatives shall not be added to clear coatings. Alkylphenol derivatives	oncentration shall be o 1907/2006.  Safety Data Sheets.  aning chemicals, deives are defined as	Compliancy

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The total quantity of residual monomers (excluding acrylamide) that may be or have been assigned any of the following risk phrases (or combinations thereof) and are present in coatings, retention aids, strengtheners, water repellents or chemicals used in internal and external water treatment shall not exceed 100 ppm (calculated on the basis of their solid content):

R46 H340 May cause genetic defects

R45 H350 May cause cancer

R49 H350i May cause cancer by inhalation

R40 H351 Suspected of causing cancer

R60 H360F May damage fertility

R61 H360D May damage the unborn child

R60/61/60-61 H360FD May damage fertility. May damage the unborn child

R60/63 H360Fd May damage fertility. Suspected of damaging the unborn child

R61/62 H360Df May damage the unborn child. Suspected of damaging fertility

R50/50-53 H400 Very toxic to aquatic life

R50-53 H410 Very toxic to aquatic life with long-lasting effects

R51-53 H411 Toxic to aquatic life with long-lasting effects

R52-53 H412 Harmful to aquatic life with long-lasting effects

R53 H413 May cause long-lasting effects to aquatic life

Please, provide the valid Material Safety Data Sheets.

#### Surfactants in de-inking

All surfactants used in de-inking shall be ultimately biodegradable.

Please, provide the valid Material Safety Data Sheets,

or test reports for each surfactant which shall indicate the test method, threshold and conclusion stated, using one of the following test method and pass levels: OECD 302 A-C (or equivalent ISO standards), with a percentage degradation (including adsorption) within 28 days of at least 70 % for 302 C.

A and B, and of at least 60 % for 302 C.

#### **Biocides**

The active components in biocides or biostatic agents used to counter slime-forming organisms in circulation water systems containing fibres shall not be potentially bio-accumulative. Biocides' bioaccumulation potentials are characterised by log Pow (log octanol/water partition coefficient) < 3,0 or an experimentally determined bioconcentration factor (BCF)  $\leq$  100.

Please, provide the valid Material Safety Data Sheets,

or test report which shall indicate the test method, threshold and conclusion stated, using the following test methods: OECD 107, 117 or 305 A-E.

#### Azo dyes

Azo dyes that may cleave to any of the following aromatic amines shall not be used, in accordance with Annex XVII to Regulation (EC) No 1907/2006:

1. 4-aminobiphenyl (92-67-1); 2. benzidine (92-87-5); 3. 4-chloro-o-toluidine (95-69-2); 4. 2-naphthylamine (91-59-8); 5. o-aminoazotoluene (97-56-3); 6. 2-amino-4-nitrotoluene (99-55-8); 7. p-chloroaniline (106-47-8); 8. 2,4-diaminoanisole (615-05-4); 9. 4,4'-diaminodiphenylmethane (101-77-9); 10. 3,3'-dichlorobenzidine (91-94-1); 11. 3,3'-dimethoxybenzidine (119-90-4); 12. 3,3'-dimethylbenzidine (119-93-7); 13. 3,3'-dimethyl-4,4'-diaminodiphenylmethane (838-88-0); 14. p-cresidine (120-71-8); 15. 4,4'-methylene-bis-(2-chloroaniline) (101-14-4); 16. 4,4'-oxydianiline (101-80-4); 17. 4,4'-thiodianiline (139-65-1); 18. o-toluidine (95-53-4); 19. 2,4-diaminotoluene (95-80-7); 20. 2,4,5-trimethylaniline (137-17-7); 21. 4-aminoazobenzene (60-09-3); 22. o-anisidine (90-04-0)

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Metal complex of	dye stuffs or pigments		
	based on lead, copper, chromium, nickel or aluminium shall not be used. res or pigments may, however, be used.	Copper	
Ionic impurities	in dye stuffs		
	impurities in the dye stuffs used shall not exceed the following: Ag 100 ppm	n; As 50	
ppm; Ba 100 ppm;	Cd 20 ppm; Co 500 ppm; Cr 100 ppm; Cu 250 ppm; Fe 2 500 ppm; Hg 4 ppm; M	n 1 000	
ppm; Ni 200 ppm;	Pb 100 ppm; Se 20 ppm; Sb 50 ppm; Sn 250 ppm; Zn 1 500 ppm.		
All types of chemi	cals		
products w	cals product shall not contain substances or mixture that classified the chemicals with the hazard classes or categories specified below referred to in Article 57 of (EC) No 1907/2006 of the European Parliament and of the Council.	Pre	esent / not present
List of hazard state	ements and risk phrases: Criterion 4a)		se the concentration value
Risk Phrases	Hazard Statements	O i	the special conditions*
R28	H300 Fatal if swallowed		
R25	H301 Toxic if swallowed		
R65	H304 May be fatal if swallowed and enters airways		
R27	H310 Fatal in contact with skin		
R24	H311 Toxic in contact with skin		
R23/26	H330 Fatal if inhaled		
R23	H331 Toxic if inhaled		
R46	H340 May cause genetic defects		
R68	H341 Suspected of causing genetic defects		
R45	H350 May cause cancer		
R49	H350i May cause cancer by inhalation		
R40	H351 Suspected of causing cancer		
R60	H360F May damage fertility		
R61	H360D May damage the unborn child		
R60/61/60-61	H360FD May damage fertility. May damage the unborn child		
R60/63	H360Fd May damage fertility. Suspected of damaging the unborn child		
R61/62	H360Df May damage the unborn child. Suspected of damaging fertility		
R62	H361f Suspected of damaging fertility		
R63	H361d Suspected of damaging the unborn child		
R62-63	H361fd Suspected of damaging fertility. Suspected of damaging the unborn child.		

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R64	H362 May cause harm to breast fed children	
R39/23/24/25/26/27/28	H370 Causes damage to organs	
R68/20/21/22	H371 May cause damage to organs	
R48/25/24/23	H372 Causes damage to organs through prolonged or repeated exposure	
R48/20/21/22	H373 May cause damage to organs through prolonged or repeated exposure	
R50	H400 Very toxic to aquatic life	
R50-53	H410 Very toxic to aquatic life with long-lasting effects	
R51-53	H411 Toxic to aquatic life with long-lasting effects	
R52-53	H412 Harmful to aquatic life with long-lasting effects	
R53	H413 May cause long-lasting effects to aquatic life	
R59	EUH059 Hazardous to the ozone layer	
R29	EUH029 Contact with water liberates toxic gas	
R31	EUH031 Contact with acids liberates toxic gas	
R32	EUH032 Contact with acids liberates very toxic gas	
R39-41	EUH070 Toxic by eye contact	
R43 No commercia	I dye formulation, colorants, surface-finishing agents, auxiliaries and coating	
materials shall be used on	either pulp or paper that has been assigned or may be assigned at the time of	
application the hazard sta	tement H317: May cause allergic skin reaction.	
1907/2006 of the Europe determined in according	Is shall not contain <u>substances CMR</u> referred to in Article 57 a)b)c) of Regulation (EC) No ropean Parliament and of the Council; above the generic or specific concentration limits dance with the Article 10 of Regulation (EC) No 1272/2008. Where specific concentration they shall prevail over the generic ones.	
•	Is shall not contain substances PBT, vPvB, or Endocrine disrupting referred to in Article 57 o 1907/2006 of the European Parliament; above 0,1 % weight by weight.	
* Special conditions:		Comments on special conditions applicable
•	es change their properties upon processing (e.g., become no longer bioavailable, undergo nat the identified hazard no longer applies, these substances are exempted from the above	Epital Collandina applicable

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# **ANNEX 5**

Form 4: Self-declaration of compliance from the paper/board producers

to criterion 1 "Substrate" and criterion 2 "Fibres: Sustainable forest Management" and criterion 4 "recyclability".

Supplier	's name:			
Paper/Boa	ard names :			
Type of Pa	aper/Board concerned :			
☐ Re	ecycled paper/board	paper/board		
THE SUP	PPLIER DECLARES:			
present de Commissi	nformation related to the paper, of eclaration is in conformity with the on Decision of 2 May 2014 establish paper products (2014/256/EU).	e characteristics of the products	and pro	cesses, according to the
Date	Name & First name	Fonction	Signa	ture & Company Stamp
				G 11
DADED	REQUIREM			Compliancy
Paper < 4 "Copying	Substrate < 400 g/m2 CRITERIO and graphic paper"  ease, provide the valid EU Ecolabel of	e criteria 1, 2, 4 and 5 of the EU Eco		paper < 400g/m².
BOARD	Substrate > 400 g/m <sup>2</sup> CRITERIO	N 1		
	<b>400 g/m<sup>2</sup></b> shall be in conformity with the ed paper products"	criteria part B of the present EU Eco	label for	
Ple	ease, provide the Declaration of com	pliance related to the emissions ar	nd waste c	riteria.
VIRGIN	PAPER/BOARD CRITERION 2			

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# Ecolabel www.ecolabel.eu

#### CONVERTED PAPER PRODUCT USER'S MANUAL (Commission Decision 2014/256/EU)

Virgin fibres shall be covered by valid sustainable forest management and chain of custody certificates issued by an independent third party certification scheme such as **FSC**, **PEFC** or equivalent.

Please, provide the valid chain of custody certificates such as PEFC, FSC or equivalent or the valid EU Ecolabel certificate for "copying & graphic" for the paper < 400g/m<sup>2</sup>.

#### **RECYCLED PAPER/BOARD CRITERION 2**

The grades of recovered fibres used for the paper/board shall be in accordance with the **standard EN 643** or an equivalent standard.

# UNCERTIFIED MATERIALS DECLARATION CRITERION 2 (UNCERTIFIED FIBRES CONTAINED IN PAPER/BOARD)

Where certification schemes allow mixing of certified material (fibres certified Forest Management), recycled materials and uncertified material in a product or product line, the proportion of uncertified virgin material shall not exceed 30% of the total fibre raw material.

If the paper or board contains mill broke (own or purchased), the amount of mill broke shall not be used for the percentage calculation herein above of uncertified material.

Such uncertified material shall be covered by a verification system which ensures that it is legally sourced and meets any other requirement of the certification scheme with respect to uncertified material. The certification bodies issuing forest and/or chain of custody certificates shall be accredited/recognised by that certification scheme.

Please, provide the appropriate list of paper/board composition indicating the types, quantities and origins of fibres used in the pulp and the board production.

#### **Recyclability CRITERION 4)**

The paper / board shall be recyclable. The wet strength agents may be used only if the recyclability of paper or board can be proved.

Wet strength agents are used in the paper / board production process?

The test results demonstrate the recyclability of paper / board including wet strength agents?

Please, provide the test result of the recyclability for wet strength agents according to the PTS method PTS-RH 021/97 or equivalent test methods.

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## ANNEX 6

## Types of certificates

# **Types of FSC certificates - Forest Management certification**

This certificate covers each individual forest management operation. If forest management is in full compliance with FSC requirements, the FSC certificate is awarded. If minor non-compliances are noted, the certificate can be issued with conditions that have to be met within a clearly determined time frame. If the forest management is not fully compliant with FSC requirements, preconditions are noted which have to be fulfilled before the FSC certificate can be awarded. The EU Ecolabel can be granted only in case the FSC certificate is fully valid, meaning that there should be proofs that the conditions to solve the minor non-compliances (if any) have been met.

FSC accredited certification bodies audit each FSC certificate at least once a year. If during these audits the certification body finds that a company has non-compliances with FSC requirements, Corrective Action Requests (CARs) are issued and the company is required to make the prescribed changes within a given time frame or else it will loose its FSC certificate. When this happens, the applicant shall immediately inform the Competent Body about the opening of the non-compliances procedure and as well inform the Competent Body when the non-compliances are closed.

To trade the forest products with the FSC logo and claim, the forest manager or owner must also obtain FSC **chain of custody certification**. It offers a guarantee that the product comes from a well-managed forest and enabling you to pass on the benefits of certification to your customers.

# Types of FSC certificates - Chain of Custody (CoC) certification

FSC chain of custody (CoC) tracks FSC certified material through the production process - from the forest to the consumer, including all successive stages of processing, transformation, manufacturing and distribution.

CoC certification requires operations to identify the origin of raw materials used in FSC certified products and to keep FSC certified products separate from other products throughout the production process.

# Types of FSC certificates - Controlled Wood

The non-certified material must comply with FSC Controlled Wood standards and be independently verified before it is mixed with certified material. This certificate makes sure that the wood has not been:

- 1. Illegally harvested
- 2. Harvested in violation of traditional and civil rights

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- 3. Harvested in forests that have been identified to be of particular biological and/or cultural value
- 4. Harvested from conversion of natural forest (or other natural habitat)
- 5. Harvested from genetically modified trees.

Types of PEFC certificates – Sustainable Forest Management certification

Obtaining PEFC Sustainable Forest Management certification demonstrates that management practices meet requirements for best practice in sustainable forest management, including:

- Biodiversity of forest ecosystems is maintained or enhanced
- The range of ecosystem services that forests provide is sustained
  - they provide food, fibre, biomass and wood
  - they are a key part of the water cycle, act as sinks capturing and storing carbon, and prevent soil erosion
  - they provide habitats and shelter for people and wildlife; and
  - they offer spiritual and recreational benefits
- Chemicals are substituted by natural alternatives or their use is minimized
- Workers' rights and welfare are protected
- Local employment is encouraged
- Indigenous peoples' rights are respected
- Operations are undertaken within the legal framework and following best practices.

# Types of PEFC certificates - Chain of Custody (CoC) certification

PEFC's Chain of Custody certification is a mechanism for tracking certified material from the forest to the final product to ensure that the wood, wood fibre or non-wood forest produce contained in the product or product line can be traced back to certified forests. It ensures that claims about products originating in sustainably managed forests are credible and verifiable throughout the whole supply chain.

Chain of Custody certification is carried out by accredited certification bodies that verify compliance of the wood flow accounting system applied by an enterprise complies with PEFC's International Chain of Custody Standard.

There are two mechanisms for tracing the origins of forest-based products, tailored to the situation and needs of certified companies. These include:

• The **percentage based method** – this mechanism allows mixing certified and non-certified raw material during the production or trading process. However the percentage of the

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certified raw material must be known and communicated to the company's customers (average percentage). Alternatively, the company can sell as certified the proportion of its production which equals the percentage of certified raw material used (volume credit).

• The **physical separation method** – this mechanism requires separating certified and non-certified raw material during all phases of the company's production/trading process to ensure that certified raw material is not mixed with non-certified raw material.

When the physical separation method is used for products with percentage-based claims, every delivery must be processed or traded separately.

To prevent wood from **controversial sources** (**illegal logging**) finding its way into products, PEFC has put in place a stringent safeguard mechanism for the avoidance of raw material from controversial sources. The mechanism is a compulsory part of PEFC's Chain of Custody standard and puts in place safety checks such as risk analyses, external assessments and onsite inspections to ensure the legality of the uncertified wood. These safeguard checks are scrutinized by the independent certifiers during their annual audits and provide companies with a "double safeguard measure" for their procurement.

PEFC Chain of Custody standard specifies as controversial sources those activities that do not comply with local, national, or international legislation, in particular relating to the following areas:

- forestry operations and harvesting, including conversion of forest to other uses;
- management of areas with high environmental and cultural values designed and covered by the legislation;
- protected and endangered species;
- health and labour issues relating to forest workers;
- property, tenure and use rights of indigenous peoples;
- payment of taxes and royalties; and

areas utilizing genetically modified organisms.

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B) Annexes related to applicant (Criteria 3 to 11)

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# **ANNEX 7**

Form 5: Information of all consumables used for the printing, coating and finishing of the converted paper products

Producer: _	Date:	

Che Trade name	mical Functional name	CAS number	Function	Supplier (Producer / Importer)	Annual amount used in process (kg or l/year)	VOC content (%)	VOC amount (kg/year)	Safety Data Sheet (X)



Supplier's name:

# **ANNEX 7**

Form 6: Self-declaration of compliance to the criterion 3 from the chemicals suppliers of consummables used for printing, coating and finishing of the converted paper product

Damping THE SUPI that all inf present dec	dyes, \( \) adhesives, \( \) washing agents, \( \) g solutions, \( \) Alcohols, \( \) Other to be pureline DECLARES, formation related to the paper, carelaration is in conformity with the conformity of 2 May 2014 establishing	récised: dboard or board supplic haracteristics of the prod	ed to the applicant plucts and processes, a	rovided in this
	paper products (2014/256/EU).	ig the ecological criteria	of the award of the E	20 Ecolabel for
Date	Name & First name	Fonction	Signature & C	Company Stamp
REQUIREN	MENTS APPLIES TO			Compliance
<b>H410/R50-53</b> 1272/2008, ai	er as part of the formulation or as part of any or H411/R51-53 in accordance with Directive or permitted only if their bioaccumulation pot ficient) < 3.0 or an experimentally determined by	57/548/EEC, Directive 1999/45/E entials are characterised by log	C or Regulation (EC) No Pow (log octanol/water 0. I Safety Data Sheets,	Criterion 3c)
partition coen	or	separate test report regarding	ng the log P <sub>ow</sub> or BCF.	
		separate test report regardi	ng the log Pow or BCF.	
Washing age Washing agen conformed if	nts only:  ts used for cleaning in printing processes and/o the amount of aromatic hydrocarbons in the terion shall not apply to toluene used as washi	or sub-processes that contain <u>arc</u> washing agent products used	omatic hydrocarbon are does not exceed 0.1 %	Criterion 3d)
Washing age Washing agen conformed if (w/w). This cri	nts only:  ts used for cleaning in printing processes and/o the amount of aromatic hydrocarbons in the terion shall not apply to toluene used as washi	or sub-processes that contain <u>arc</u> washing agent products used on ng agent in rotogravure printing. se, provide the valid Materia	omatic hydrocarbon are does not exceed 0.1 %	Criterion 3d)

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#### inks, toners, varnishes, foils and laminates:

The following heavy metals or their compounds shall not be used as printing inks, toners, inks, varnishes, foils and laminates (whether as a substance or as part of any preparation used):

- Cadmium, copper (excluding copper-phthalocyanine), lead, nickel, chromium VI, mercury, arsenic, soluble barium, selenium, antimony.

Criterion 3f)

- Cobalt can only be used up to 0.1% (w/w).

Ingredients may contain traces of those metals up to 0.01% (w/w) deriving from impurities in the raw materials.

#### inks, alcohols, Washing agent, Damping solutions:

Volatile Organic Compounds (VOC) contained in the chemical: Criterion 5b)

0/

#### inks, dyes, toners, adhesives, varnishes, foils and laminates:

The present chemicals shall not contain substances and/or mixtures meeting the criteria for classification with the hazard statements or risk phrases specified below in accordance with Regulation (EC) No 1272/2008, above the generic or specific concentration limits determined in accordance with the Article 10 of Regulation (EC) No 1272/2008. Where specific concentration limits are determined they shall prevail over the generic ones.

Conform; Not conform
Precise the concentration value
or the special conditions\*

List of hazard statement	s and risk phrases: Criterion 3a)	
Risk Phrases	Hazard Statements	
R23	H331 Toxic if inhaled	
R24	H311 Toxic in contact with skin	
R25	H301 Toxic if swallowed	
R26	H330 Fatal if inhaled	
R27	H310 Fatal in contact with skin	
R28	H300 Fatal if swallowed	
R39/23, R39/24, R39/25, R39/26, R39/27, R39/28	H370 Causes damage to organs	
R40	H351 Suspected of causing cancer	
R45	H350 May cause cancer	
R46	H340 May cause genetic defects	
R48/20, R48/21, R48/22	H373 May cause damage to organs through prolonged or repeated exposure	
R48/23, R48/24, R48/25	H372 Causes damage to organs through prolonged or repeated exposure	
R49	H350i May cause cancer by inhalation	
R60	H360F May damage fertility	
R61	H360D May damage the unborn child	
R62	H361f Suspected of damaging fertility	
R63	H361d Suspected of damaging the unborn child	
R64	H362 May cause harm to breast fed children	
R65	H304 May be fatal if swallowed and enters airways	
R60/61	H360FD May damage fertility. May damage the unborn child	
R68	H341 Suspected of causing genetic defects	
R68/20, R68/21, R68/22	H371 May cause damage to organs	
R60/63	H360Fd May damage fertility. Suspected of damaging the unborn child	
R61/62	H360Df May damage the unborn child. Suspected of damaging fertility	
R62/63	H361fd Suspected of damaging fertility. Suspected of damaging the unborn child	
R50	H400 Very toxic to aquatic life R	
R53	H413 May cause long-lasting harmful effects to aquatic life	
R50/53	H410 Very toxic to aquatic life with long-lasting effects	
R51/53	H411 Toxic to aquatic life with long-lasting effects	
R52/53*	H412 Harmful to aquatic life with long-lasting effects* (allowed for UV inks & UV varnishes)	
R59	EUH059 Hazardous to the ozone layer	
R29	EUH029 Contact with water liberates toxic gas	
R32	EUH032 Contact with acids liberates very toxic gas	
R39/41	, •	
1133/41	EUH070 Toxic by eye contact	

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<ul> <li>The present chemicals shall not contain substances CMR referred to in Article 57 a)b)c) of Regulation (EC) No 1907/2006 of the European Parliament and of the Council; above the generic or specific concentration limits determined in accordance with the Article 10 of Regulation (EC) No 1272/2008. Where specific concentration limits are determined they shall prevail over the generic ones.</li> </ul>	
- The present <b>chemicals shall not contain substances PBT, vPvB, or </b> Endocrine disrupting referred to in Article 57 d)e)f) of Regulation (EC) No 1907/2006 of the European Parliament and of the Council; <b>above 0,1% weight by weight.</b>	
* Special conditions:	Comments on special conditions applicable
* Special conditions:  → <u>UV varnishes and UV inks</u> classified H412/R52-53 are also exempted from this requirement*.	

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# **ANNEX 8**

Form7: Self-declaration of compliance to

the criterion 3 a) and g) from suppliers of non-paper component

Supplier's name :
Articles names :
Type of plastic or metal component:
T

## THE SUPPLIER DECLARES,

that all information related to the paper, cardboard or board supplied to the applicant provided in this present declaration is in conformity with the characteristics of the products and processes, according to the Commission Decision of 2 May 2014 establishing the ecological criteria for the award of the EU Ecolabel for converted paper products (2014/256/EU).

mpany Stamp	Signature & Compa	Fonction	Name & First name	Date

## **PART 1 - APPLIES TO ALL COMPONENTS**

#### Hazardous substances and mixtures

Requirement:

The present plastic or metal components shall not contain substances and/or mixtures meeting the criteria for classification with the hazard statements or risk phrases specified below in accordance with Regulation (EC) No 1272/2008; above the generic or specific concentration limits determined in accordance with the Article 10 of Regulation (EC) No 1272/2008.

Where specific concentration limits are determined they shall prevail over the generic ones.

List of hazard stateme	ents and risk phrases:	Conform ; Not conform
Risk Phrase	Hazard Statement	Precise the concentration value Comments on special conditions applicable*
R23	H331 Toxic if inhaled	
R24	H311 Toxic in contact with skin	
R25	H301 Toxic if swallowed	
R26	H330 Fatal if inhaled	
R27	H310 Fatal in contact with skin	
R28	H300 Fatal if swallowed	
R39/23, R39/24, R39/25, R39/26, R39/27, R39/28	H370 Causes damage to organs	
R40	H351 Suspected of causing cancer	
R45	H350 May cause cancer	
R46	H340 May cause genetic defects	
R48/20, R48/21, R48/22	H373 May cause damage to organs through prolonged or repeated exposure	
R48/23, R48/24, R48/25	H372 Causes damage to organs through prolonged or repeated exposure	
R49	H350i May cause cancer by inhalation	
R60	H360F May damage fertility	
R61	H360D May damage the unborn child	
R62	H361f Suspected of damaging fertility	
R63	H361d Suspected of damaging the unborn child	
R64	H362 May cause harm to breast fed children	
R65	H304 May be fatal if swallowed and enters airways	
R60/61	H360FD May damage fertility. May damage the unborn child	

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R68	H341 Suspected of causing genetic defects	
R68/20, R68/21, R68/22	H371 May cause damage to organs	
R60/63	H360Fd May damage fertility. Suspected of damaging the unborn child	
R61/62	H360Df May damage the unborn child. Suspected of damaging fertility	
R62/63	H361fd Suspected of damaging fertility. Suspected of damaging the unborn child	
R50	H400 Very toxic to aquatic life	
R53	H413 May cause long-lasting harmful effects to aquatic life	
R50/53	H410 Very toxic to aquatic life with long-lasting effects	
R51/53	H411 Toxic to aquatic life with long-lasting effects	
R52/53	H412 Harmful to aquatic life with long-lasting effects	
R59	EUH059 Hazardous to the ozone layer	
R29	EUH029 Contact with water liberates toxic gas	
R32	EUH032 Contact with acids liberates very toxic gas	
R39/41	EUH070 Toxic by eye contact	

Conform; Not conform Precise the concentration value Comments on special conditions applicable\*

#### SUBSTANCES -> CMR

The present **plastic or metal components shall not contain substances CMR** referred to in Article 57 a)b)c) of Regulation (EC) No 1907/2006 of the European Parliament and of the Council; **above the generic or specific concentration limits** determined in accordance with the Article 10 of Regulation (EC) No 1272/2008. Where specific concentration limits are determined they shall prevail over the generic ones.

#### SUBSTANCES -> PBT, vPvB, & ENDOCRINE DISRUPTING

The present **plastic or metal components shall not contain substances PBT, vPvB, or Endocrine disrupting** referred to in Article 57 d)e)f) of Regulation (EC) No 1907/2006 of the European Parliament and of the Council; **above 0,1 % weight by weight.** 

\* Special conditions:

 $\rightarrow$  IF substances or mixtures change their properties upon processing (e.g., become no longer bioavailable, undergo chemical modification) so that the identified hazard no longer applies, these substances are exempted from the above requirement.

Comments on special conditions applicable

#### PART 2 - APPLIES ONLY TO METAL COMPONENTS > 10% W/W

**Scope:** This requirement applies to each separate metal-type component exceeding 10% by weight of the final products for suspension file, folders with metal fastener, ring binder and lever arch file.

# **Applicable ; not Applicable** *To be fulfilled by the applicant for EU Ecolabel*

Conform; Not conform; Not applicable

#### Coating

Metals shall not be coated with cadmium, chromium, mercury, lead, tin and their compounds.

The surface treatment of metal surfaces with nickel or zinc can be accepted for small parts (such as rivet, eyelet, and flat bar mechanisms) where this is necessary due to heavy physical wear.

#### **Emissions from surface treatment**

Both nickel plating and zinc galvanisation shall make use of wastewater treatment, ion exchange technology, membrane technology or equal technology in order to recycle the chemical products as much as possible.

Emissions from surface treatment shall be recycled and destroyed. The system shall be closed without drainage, with an exception for zinc where the emission can be a maximum of 0.50 mg/l.

#### Chemical products used in the surface treatment

Biocides, either as part of the formulation or as part of any mixture included in the formulation, that are classified **H410/R50-53 or H411/R51-53** in accordance with Directive 67/548/EEC, Directive 1999/45/EC or Regulation (EC) No 1272/2008, are permitted only if their bioaccumulation potentials are characterised by log Pow (log octanol/water partition coefficient) <3.0 or an experimentally determined bioconcentration factor (BCF)  $\leq$ 100.

The following substances or preparations shall not be added to the chemical products used in the surface treatment:

- Alkyl phenol ethoxylates and their derivatives that may produce alkyl phenols by degradation.
- Halogenated solvents that are classified in the hazard or risk categories listed herein below.
- Phthalates that are classified with risk phrases H360F, H360D, and H361F.

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Date:

# Annex 9

Form 8: Self-declaration of compliance to

the criteria from the applicant

# **APPLICANT INFORMATION:**

Company name:	
Address:	
Country:	
Tel:	
legal representative	
Name:	
Position:	
ISO CERTIFICATION  ISO 9001 ISO 14001 EMAS	
conformity with the characteristics suppliers and sub-contractors, in	ny, I certify that all information included in these herewith declarations is in s of the products and processes, as well as the information provided by our accordance to the Commission Decision of 2 May 2014 establishing the the EU Ecolabel for converted paper products (2014/256/EU).

**Signature:** 

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PRODUCT INFORMATION:	
Products brands:	
<b>Products names:</b> (ranges)	
Family of converted paper produc	et:
<ul><li>Paper carrier bags</li><li>Envelopes</li><li>Stationery paper products</li></ul>	1. Exercise books 2. Pads 3. Loose-leafs 4. Diary & calendars 5. Folders 6. Binders 7. Suspensions files
- Others	What type?
PROCESS INFORMATION: Applies to outsourced process:	
rippines to outsourced process.	
Printing process Coating process Converting process Finishing process	
Parts of the product that are printed or crequirements.	converted by a sub-contractor shall therefore also fulfil the related
Please refer, to the list of sub-con	tractors involved in the production of the converted paper,
-	ed to subcontractors involved in the production of the converted paper

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# Criterion 3 – Excluded or limited substances and mixtures

# > DECLARATION RELATED TO CHEMICALS PRODUCTS:

This part criterion might be applicable to:

-	PRINTING PROCESS:
	Sheet offset Heatset rotation Coldset, newspaper Coldset, form printing Coldset rotation Coldset rotation  (except newspapers and forms)  Gravure printing Digital printing Screen printing Flexography, corrugated fibreboard Flexography (except corrugated fibreboard)
_	CONSUMABLES
	Printing inks and additives  Dyes  Tonners and additives  Washing agents  Biocides  Alcohols  Other cleaning chemical  Adhesives  Damping solutions  Varnishes  Overprinting varnishes  Foils and laminates  What?
=	OTHER TYPE OF CONSUMABLES USED, which have specific properties:
	Toluene-based washing agent Printing ink for gravure printing  Ultraviolet (UV) curable
	Please refer to the list of all consumables used for the printing, finishing and coating.  Please refer to the declarations from the chemicals suppliers.  Please, refer the Material Safety Data Sheets.

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# Criterion 3 – Excluded or limited substances and mixtures

# (a) Hazardous substances and mixtures

REQUIREMENTS	Conform / Not conform Not applicable
APPLIES TO INKS, DYES, TONERS, ADHESIVES, VARNISHES, FOILS A	ND LAMINATES
Hazardous substances and mixtures	
Consumables that could end up in the final converted paper product, and that contain hazardous substances and/or mixtures meeting the criteria for classification with the hazard statements or risk phrases specified in accordance with Regulation (EC) No 1272/2008 shall not be used for printing, coating, and finishing operations of the final converted paper product, above the generic or specific concentration limits determined in accordance with the Article 10 of Regulation (EC) No 1272/2008. Where specific concentration limits are determined they shall prevail over the generic ones.	
Substances CMR	
Consumables that could end up in the final converted paper product, and that contain substances CMR referred to in Article 57 a)b)c) of Regulation (EC) No 1907/2006 shall not be used for printing, coating, and finishing operations of the final converted paper product, above the generic or specific concentration limits determined in accordance with the Article 10 of Regulation (EC) No 1272/2008. Where specific concentration limits are determined they shall prevail over the generic ones.	
Substances PBT – vPvB – Endocrine disruptors	
Consumables that could end up in the final converted paper product, and that contain substances referred to in Article 57 d)e)f) of Regulation (EC) No 1907/2006 of the European Parliament and of the Council shall not be used for printing, coating, and finishing operations of the final converted paper product; above 0,1 % weight by weight.	
* Special conditions:  → UV varnishes and UV inks classified H412/R52-53 are also exempted from this requirement*.  → Toluene is exempted from this requirement for the use in rotogravure printing processes where a closed or encapsulated installation or recovery system, or any equivalent system, is in place to control and monitor fugitive emissions and where the recovery efficiency is at least 92 %.  → IF substances or mixtures change their properties upon processing (e.g., become no longer bioavailable, undergo chemical modification) so that the identified hazard no longer applies, these substances are exempted from the above requirement.	Comments on special conditions applicable
SUBSTANCES VERY HIGH CONCERN SVHC	
The applicant declares that the substances very high concern referred to in this criterion are not retained in the final product above the concentration limits specified in the criterion.	

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# Criterion 3 – Excluded or limited substances and mixtures

# Criterion 3c) 3d) 3e) 3f)

REQUIREMENTS	Conform / Not conform Not applicable
APPLIES TO BIOCIDES ONLY	
Biocides, either as part of the formulation or as part of any mixture included in the formulation, the classified <b>H410/R50-53</b> or <b>H411/R51-53</b> in accordance with Directive 67/548/EEC, Dir 1999/45/EC or Regulation (EC) No 1272/2008, are permitted only if their bioaccumulation potential characterised by log Pow (log octanol/water partition coefficient) <3.0 or an experimentally determined by the concentration factor (BCF) ≤100.	ective als are
Please, refer to the valid Material Safety Data Sheets, or separate test report regard	ding the log Pow or BCF.
APPLIES TO WASHING AGENTS ONLY	
Definition: Washing agents are chemicals used to wash printing forms and printing presses to reprinting inks, paper dust and similar products; cleaners for finishing machines and printing mac printing inks removers used in washing off dried printing inks.	
Washing agents used for cleaning in printing processes and/or sub-processes that contain are hydrocarbon are conformed if the amount of aromatic hydrocarbons in the washing agent products does not exceed 0.1 % (w/w). This criterion shall not apply to toluene used as washing agrotogravure printing.	s used
If the amount of aromatic hydrocarbons in the washing agent products used exceeds 0.10 % (w/w amount of aromatic hydrocarbon-based washing agent used annually in converting process docexceed 5 % of the total amount of washing agent used in one calendar year.  This criterion shall not apply to toluene used as washing agent in rotogravure printing.  This declaration shall not be complete in case of outsourcing for the printing process. But ask to subcontractors to complete the relevant declaration.	es not
Please refer to the list of washing agents used in the process and the calculation.	
APPLIES TO INKS, DYES, TONERS, ADHESIVES, OR WASHING AGENTS CLEANING CHEMICALS	S OR OTHER
The following substances or preparations shall not be added to inks, dyes, toners, adhesives, or wat agents or other cleaning chemicals used for the printing of the converted paper product:  - Alkyl phenol ethoxylates and their derivatives that may produce alkyl phenols by degradation to the Halogenated solvents that are classified in the hazard or risk categories listed herein below.  - Phthalates that are classified with risk phrases H360F, H360D, and H361F.	
APPLIES TO INKS, TONERS, VARNISHES, FOILS AND LAMINATES	
The following <b>heavy metals</b> or their compounds shall not be used as printing inks, toners, inks, varifoils and laminates (whether as a substance or as part of any preparation used):  - Cadmium, copper (excluding copper-phthalocyanine), lead, nickel, chromium VI, mercury, as soluble barium, selenium, antimony.  - Cobalt can only be used up to 0.1% (w/w).  Ingredients may contain traces of those metals up to 0.01% (w/w) deriving from impurities in the materials.	rsenic,

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Criterion 3 – Excluded or limited substances and mixtures

This criterion applies to	TO NON-PAPER CO	01,	
PLASTIC	METAL	ОТН	ER
COMPONENTS:	COMPONENTS:		IPONENTS:
Plastic cover or insert	binder	Elasti	
Plastic laminate	eyelet		
bookmark	rivet		
stickers	flat bar		
Other to be précised:	Other to be précised:	Other	to be précised:
PART 1 - APPLIES TO ALL NON-COMPO	NENTS:		Conform; Not conform
REQUIREMENTS:			Not applicable Comments on special conditions applicable*
Hazardous substances and mixtures			
The non-paper components shall not contain subfor classification with the hazard statements or concentration limits.			
SUBSTANCES -> CMR			
The non-paper components shall not contain specific concentration limits.	in substances CMR above	the generic or	
SUBSTANCES -> PBT, vPvB, & ENDOO			
The present non-paper components shall not c disrupting above 0,1 % weight by weight.	ontain substances PBT, vPv	B, or Endocrine	
* Special conditions:			
→ IF substances or mixtures change their properties upo	on processing so that the identifie	d hazard no longer	
applies, these substances are exempted from the above requi	irement.		
		7 <b>:</b>	Conform : Not conform
PART 2 - APPLIES ONLY TO METAL CO REQUIREMENTS:		<u>/:</u>	Conform; Not conform Not applicable Comments on special conditions applicable*
PART 2 - APPLIES ONLY TO METAL CO	MPONENTS > 10% W/W	sceeding 10%	Not applicable
PART 2 - APPLIES ONLY TO METAL CO REQUIREMENTS:  Scope: This requirement applies to each separable by weight of the final products for suspension and lever arch file.  Coating & surface treatment process	ate metal-type component exfile, folders with metal faste	sceeding 10% ner, ring binder	Not applicable
PART 2 - APPLIES ONLY TO METAL CO  REQUIREMENTS:  Scope: This requirement applies to each separ by weight of the final products for suspension and lever arch file.  Coating & surface treatment process  Metals shall not be coated with cadmium, chr their compounds.	eate metal-type component extended file, folders with metal fasteromium, nickel, zinc, mercur	ry, lead, tin and	Not applicable
PART 2 - APPLIES ONLY TO METAL CO  REQUIREMENTS:  Scope: This requirement applies to each separt by weight of the final products for suspension and lever arch file.  Coating & surface treatment process  Metals shall not be coated with cadmium, christic their compounds.  The surface treatment of metal surfaces with	ate metal-type component exfile, folders with metal faste romium, nickel, zinc, mercura nickel or zinc can be acc	exceeding 10% ner, ring binder ry, lead, tin and epted for small	Not applicable
PART 2 - APPLIES ONLY TO METAL CO REQUIREMENTS:  Scope: This requirement applies to each separt by weight of the final products for suspension and lever arch file.  Coating & surface treatment process  Metals shall not be coated with cadmium, christheir compounds.  The surface treatment of metal surfaces with parts (such as rivet, eyelet, and flat bar mechanisms).	ate metal-type component exfile, folders with metal faste romium, nickel, zinc, mercura nickel or zinc can be acc	exceeding 10% ner, ring binder ry, lead, tin and epted for small	Not applicable
PART 2 - APPLIES ONLY TO METAL CO REQUIREMENTS:  Scope: This requirement applies to each separt by weight of the final products for suspension and lever arch file.  Coating & surface treatment process  Metals shall not be coated with cadmium, christheir compounds.  The surface treatment of metal surfaces with parts (such as rivet, eyelet, and flat bar mechal physical wear.	enter metal-type component experience of the file, folders with metal faste fromium, nickel, zinc, mercuran nickel or zinc can be acconisms) where this is necessar	ry, lead, tin and epted for small ry due to heavy	Not applicable
PART 2 - APPLIES ONLY TO METAL CO  REQUIREMENTS:  Scope: This requirement applies to each separate by weight of the final products for suspension and lever arch file.  Coating & surface treatment process  Metals shall not be coated with cadmium, chratheir compounds.  The surface treatment of metal surfaces with parts (such as rivet, eyelet, and flat bar mechan physical wear.  The chemical products used in the surface to	enter metal-type component experiment in nickel or zinc can be accomisms) where this is necessar	ry, lead, tin and epted for small ry due to heavy	Not applicable
PART 2 - APPLIES ONLY TO METAL CO REQUIREMENTS:  Scope: This requirement applies to each separt by weight of the final products for suspension and lever arch file.  Coating & surface treatment process  Metals shall not be coated with cadmium, christheir compounds.  The surface treatment of metal surfaces with parts (such as rivet, eyelet, and flat bar mechal physical wear.	enter metal-type component experiment in nickel or zinc can be accomisms) where this is necessar	ry, lead, tin and epted for small ry due to heavy	Not applicable
PART 2 - APPLIES ONLY TO METAL CO  REQUIREMENTS:  Scope: This requirement applies to each separate by weight of the final products for suspension and lever arch file.  Coating & surface treatment process  Metals shall not be coated with cadmium, chratheir compounds.  The surface treatment of metal surfaces with parts (such as rivet, eyelet, and flat bar mechan physical wear.  The chemical products used in the surface of criteria 3 c) Biocides and 3 e) Alkyl pherometals.	ate metal-type component exfile, folders with metal faste romium, nickel, zinc, mercuran nickel or zinc can be acconisms) where this is necessar treatment must be in componel ethoxylates – Halogen	ry, lead, tin and epted for small ry due to heavy liance with the ated solvents -	Not applicable Comments on special conditions applicable*
PART 2 - APPLIES ONLY TO METAL CO REQUIREMENTS:  Scope: This requirement applies to each separ by weight of the final products for suspension and lever arch file.  Coating & surface treatment process  Metals shall not be coated with cadmium, chr their compounds.  The surface treatment of metal surfaces with parts (such as rivet, eyelet, and flat bar mechal physical wear.  The chemical products used in the surface to criteria 3 c) Biocides and 3 e) Alkyl pher Phthalates.	cate metal-type component exfile, folders with metal faste for mickel or zinc can be accomisms) where this is necessal treatment must be in component expression of ethoxylates — Halogen	ry, lead, tin and epted for small ry due to heavy liance with the ated solvents -	Not applicable Comments on special conditions applicable*
PART 2 - APPLIES ONLY TO METAL CO REQUIREMENTS:  Scope: This requirement applies to each separate by weight of the final products for suspension and lever arch file.  Coating & surface treatment process  Metals shall not be coated with cadmium, chratheir compounds.  The surface treatment of metal surfaces with parts (such as rivet, eyelet, and flat bar mechal physical wear.  The chemical products used in the surface of criteria 3 c) Biocides and 3 e) Alkyl pheri Phthalates.  Please refer to the list of non-paper	cate metal-type component exfile, folders with metal faste for mickel or zinc can be accomisms) where this is necessal treatment must be in component expression of ethoxylates — Halogen	ry, lead, tin and epted for small ry due to heavy liance with the ated solvents -	Not applicable Comments on special conditions applicable*

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# REQUIREMENTS: Conform / Not conform Not applicable

Non-paper compon	ents		
	s of the converted paper prod hinder the recycling process.	duct shall be easily removable to ensure that s.	
Coating varnishes a	nd lamination		
Coating varnishes and lamination, including polyethene and/or polyethene/polypropylene, may be used only for binders, folders, exercise books, notebooks and diaries.			
Type of coating varnishes and lamination and use:			
Polyethene Polypropylene	Exerce Diarie Binde	——————————————————————————————————————	
Other	Folde	lers	

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#### Criterion 5 - Emissions

# REQUIREMENTS Conform / Not conform Not applicable

## **Emissions to water in Offset printing**

Rinsing water containing silver from film processing, as well as from plate production, and photo-chemicals shall not be discharged to a sewage treatment plant.

Please, refer to the description of the management of photo-chemicals and silver containing rinsing water on site.

## **Emissions to water in Rotogravure printing**

The amount of Cr and Cu discharged into a sewage treatment plant must not exceed, respectively, 45 mg per m2 and 400 mg per m2 of printing cylinder surface area used in the press.

- Please, refer to annual analytical test\* carried out by an accredited laboratory.
- Please, refer to the calculation table of the Cr and Cu discharges per m<sup>2</sup> of printing cylinder.

\* Special conditions:

Comments on

special conditions applicable

- → Discharges of Cr and Cu into the sewage shall be checked at rotogravure printing plants after treatment and before their release.
- → A representative sample of Cr and Cu discharges shall be collected each month.
- → At least one annual analytical test shall be carried out by an accredited laboratory
- → The reference test methods are:
  - for Cr: EN ISO 11885, and EN 1233,
  - for Cu: EN ISO 11885.

## **Emissions to air in printing process**

The Volatile Organic Compounds (VOC) amount shall not exceed 5 kg/tonnes of paper purchased and used. Where a printing/converting house uses different printing technologies, this criterion shall be fulfilled for each one separately.

Please, refer to the calculation table of VOC.

#### **Emissions to air in heat-set printing**

- With an integrated after-burner unit.

 $P_{VOC} = 90 \%$  of VOC contained in damping

+ 85 % of VOC contained in washing agents.

without an integrated after-burner unit

 $P_{VOC} = 90 \%$  of VOC contained in damping

+85 % of VOC contained in washing agents,

+ 10 % of VOC contained in the printing inks.

Please, refer to the calculation table of VOC.

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#### Criterion 6 - Waste

#### **REQUIREMENTS:**

# Conform / Not conform Not applicable

#### Waste management

The facility where the converted paper products are produced shall have in place a system for handling waste, including residual products derived from the production of the converted paper products, as defined by local and national relevant regulatory authorities.

Please, refer to the description of the procedures adopted for waste management related to recyclable materials, recovery of materials for other uses, hazardous waste.

## **Waste Paper**

The annual amount of waste paper produced during the converting (including finishing processes) of the ecolabelled converted paper product, divided by annual tonnes of paper purchased and used for the production of ecolabelled converted paper product, shall not exceed 20 % for stationery paper products, envelopes and 10% for paper bags.

Where the finishing processes are outsourced to another company, the amount of waste paper resulting from the outsourced work shall be calculated and declared in the calculation

- Please, refer to the description of the calculation of the amount of waste paper.
- Please, refer to the declaration from the contractor collecting the waste paper from the printing house.
- Please, refer to the dossier of sub-contractors in case of the finishing processes were outsourced

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#### **CRITERION 8 - TRAINING**

## REQUIREMENTS: Conform / Not conform

All members of staff participating in day-to-day operation participated on a training programme, to ensure that the EU Ecolabel requirements are fulfilled and continuously improved.

- Please, refer to the details of the training programme, its content.
- Please, refer to the list of staff have received what training and when.
- Please, refer to sample of training material.

## Criterion 11 – Information appearing on the EU Ecolabel

The optional label with text box shall contain the following text:

- This product is recyclable
- Emissions of chemicals to air and water of paper production, printing and converting processes have been limited
  - Please, refer to the sample of the converted paper product showing the label.

OR

Please, refer to the draft on how and where the text will appear and how the EU Ecolabel and respective license number will appear (if applicable).

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C)Annexes related to sub-contractors of converting process

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# Annex 10

Form 9: Self-declaration of compliance to the criteria from the sub-contractors of converting process.

# **SUBCONTRACTOR INFORMATION:**

Company name:			
Address:			
	•••••		
Country:	•••••	••••••	
Tel:	•••••		
legal representative	Name:		
	Position:		
Activities outsourced	l:	Applicable criteria:	$\neg$
Pri	nting process	Substances – Emissions –paper waste	
Co.	ating process	Substances – paper waste	
Co	nverting process	Substances –waste management – paper waste	
Fin	nishing process	Substances – paper waste	
rmity with the chara iers and sub-contrac	of company, I certify necteristics of the pro- ectors, in accordance	that all information included in these herewith declarati ducts and processes, as well as the information provided to the Commission Decision of 2 May 2014 establish	l by
gical criteria for the a	ward of the EU Ecol	abel for converted paper products (2014/256/EU).	
Date:		Signature:	

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# Criterion 3 – Excluded or limited substances and mixtures

# > DECLARATION RELATED TO CHEMICALS PRODUCTS:

This part criterion might be applicable to:

-	PRINTING PROCESS:
	Sheet offset Heatset rotation Coldset, newspaper Coldset, form printing Coldset rotation Coldset rotation Coldset rotation Coldset rotation (except newspapers and forms)  Gravure printing Digital printing Screen printing Flexography, corrugated fibreboard Flexography (except corrugated fibreboard)
	CONSUMABLES
	that could end up in the final converted paper product used for the printing and for the finishing:  Printing inks and additives  Dyes  Tonners and additives  Washing agents  Biocides  Alcohols  Other cleaning chemical  Adhesives  Damping solutions  Varnishes  Overprinting varnishes  Foils and laminates  What?
-	OTHER TYPE OF CONSUMABLES USED, which have specific properties:
	Toluene-based washing agent Printing ink for gravure printing  Ultraviolet (UV) curable
	Please refer to the list of all consumables used for the printing, finishing and coating.  Please refer to the declarations from the chemicals suppliers.  Please, refer the Material Safety Data Sheets.

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# Criterion 3 – Excluded or limited substances and mixtures

# (b) Hazardous substances and mixtures

REQUIREMENTS	Conform / Not conform Not applicable	
APPLIES TO INKS, DYES, TONERS, ADHESIVES, VARNISHES, FOILS AND LAMINATES		
Hazardous substances and mixtures		
Consumables that could end up in the final converted paper product, and that contain hazardous substances and/or mixtures meeting the criteria for classification with the hazard statements or risk phrases specified in accordance with Regulation (EC) No 1272/2008 shall not be used for printing, coating, and finishing operations of the final converted paper product, above the generic or specific concentration limits determined in accordance with the Article 10 of Regulation (EC) No 1272/2008. Where specific concentration limits are determined they shall prevail over the generic ones.		
Substances CMR		
Consumables that could end up in the final converted paper product, and that contain substances CMR referred to in Article 57 a)b)c) of Regulation (EC) No 1907/2006 shall not be used for printing, coating, and finishing operations of the final converted paper product, above the generic or specific concentration limits determined in accordance with the Article 10 of Regulation (EC) No 1272/2008. Where specific concentration limits are determined they shall prevail over the generic ones.		
Substances PBT – vPvB – Endocrine disruptors		
Consumables that could end up in the final converted paper product, and that contain substances referred to in Article 57 d)e)f) of Regulation (EC) No 1907/2006 of the European Parliament and of the Council shall not be used for printing, coating, and finishing operations of the final converted paper product; above 0,1 % weight by weight.		
* Special conditions:  → UV varnishes and UV inks classified H412/R52-53 are also exempted from this requirement*.  → Toluene is exempted from this requirement for the use in rotogravure printing processes where a closed or encapsulated installation or recovery system, or any equivalent system, is in place to control and monitor fugitive emissions and where the recovery efficiency is at least 92 %.  → IF substances or mixtures change their properties upon processing (e.g., become no longer bioavailable, undergo chemical modification) so that the identified hazard no longer applies, these substances are exempted from the above requirement.	Comments on special conditions applicable	
SUBSTANCES VERY HIGH CONCERN SVHC		
The applicant declares that the substances very high concern referred to in this criterion are not retained in the final product above the concentration limits specified in the criterion.		

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# Criterion 3 – Excluded or limited substances and mixtures

# **Criterion 3c) 3d) 3e) 3f)**

REQUIREMENTS	Conform / Not conform Not applicable
APPLIES TO BIOCIDES ONLY	
Biocides, either as part of the formulation or as part of any mixture included in the formulation, the classified <b>H410/R50-53 or H411/R51-53</b> in accordance with Directive 67/548/EEC, Dir 1999/45/EC or Regulation (EC) No 1272/2008, are permitted only if their bioaccumulation potential characterised by log Pow (log octanol/water partition coefficient) <3.0 or an experimentally determined by the content of the coefficient of the	rective als are
Please, refer to the valid Material Safety Data Sheets, or separate test report regard	ding the log Pow or BCF.
APPLIES TO WASHING AGENTS ONLY	
Definition: Washing agents are chemicals used to wash printing forms and printing presses to reprinting inks, paper dust and similar products; cleaners for finishing machines and printing mac printing inks removers used in washing off dried printing inks.	
Washing agents used for cleaning in printing processes and/or sub-processes that contain are hydrocarbon are conformed if the amount of aromatic hydrocarbons in the washing agent products does not exceed $0.1\%$ (w/w). This criterion shall not apply to toluene used as washing agent rotogravure printing.	s used
If the amount of aromatic hydrocarbons in the washing agent products used exceeds 0.10 % (w/w amount of aromatic hydrocarbon-based washing agent used annually in converting process docexceed 5 % of the total amount of washing agent used in one calendar year.  This criterion shall not apply to toluene used as washing agent in rotogravure printing.  This declaration shall not be complete in case of outsourcing for the printing process. But ask to subcontractors to complete the relevant declaration.	es not
Please refer to the list of washing agents used in the process and the calculation.  APPLIES TO INKS, DYES, TONERS, ADHESIVES, OR WASHING AGENT	S OR OTHER
CLEANING CHEMICALS	
The following substances or preparations shall not be added to inks, dyes, toners, adhesives, or wa agents or other cleaning chemicals used for the printing of the converted paper product:  - Alkyl phenol ethoxylates and their derivatives that may produce alkyl phenols by degradational endogenated solvents that are classified in the hazard or risk categories listed herein below.  - Phthalates that are classified with risk phrases H360F, H360D, and H361F.	
APPLIES TO INKS, TONERS, VARNISHES, FOILS AND LAMINATES	
The following <b>heavy metals</b> or their compounds shall not be used as printing inks, toners, inks, varifoils and laminates (whether as a substance or as part of any preparation used):  - Cadmium, copper (excluding copper-phthalocyanine), lead, nickel, chromium VI, mercury, as soluble barium, selenium, antimony.  - Cobalt can only be used up to 0.1% (w/w).  Ingredients may contain traces of those metals up to 0.01% (w/w) deriving from impurities in the materials.	rsenic,

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#### Criterion 5 - Emissions

# REQUIREMENTS Conform / Not conform Not applicable

#### **Emissions to water in Offset printing**

Rinsing water containing silver from film processing, as well as from plate production, and photo-chemicals shall not be discharged to a sewage treatment plant.

Please, refer to the description of the management of photo-chemicals and silver containing rinsing water on site.

## **Emissions to water in Rotogravure printing**

The amount of Cr and Cu discharged into a sewage treatment plant must not exceed, respectively, 45 mg per m2 and 400 mg per m2 of printing cylinder surface area used in the press.

- Please, refer to annual analytical test\* carried out by an accredited laboratory.
- Please, refer to the calculation table of the Cr and Cu discharges per m<sup>2</sup> of printing cylinder.

\* Special conditions:

- → Discharges of Cr and Cu into the sewage shall be checked at rotogravure printing plants after treatment and before their release.
- → A representative sample of Cr and Cu discharges shall be collected each month.
- → At least one annual analytical test shall be carried out by an accredited laboratory
- → The reference test methods are:
  - for Cr: EN ISO 11885, and EN 1233,
  - for Cu: EN ISO 11885.

# Comments on special conditions applicable

#### **Emissions to air in printing process**

The Volatile Organic Compounds (VOC) amount shall not exceed 5 kg/tonnes of paper purchased and used. Where a printing/converting house uses different printing technologies, this criterion shall be fulfilled for each one separately.

Please, refer to the calculation table of VOC.

#### **Emissions to air in heat-set printing**

- With an integrated after-burner unit.

 $P_{VOC} = 90 \%$  of VOC contained in damping

+ 85 % of VOC contained in washing agents.

without an integrated after-burner unit

 $P_{VOC} = 90 \%$  of VOC contained in damping

+85 % of VOC contained in washing agents,

+ 10 % of VOC contained in the printing inks.

Please, refer to the calculation table of VOC.

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#### Criterion 6 - Waste

## Applies only to the facility where the converted paper products are produced:

# Conform / Not conform Not applicable

#### Waste management

The facility where the converted paper products are produced shall have in place a system for handling waste, including residual products derived from the production of the converted paper products, as defined by local and national relevant regulatory authorities.

Please, refer to the description of the procedures adopted for waste management related to recyclable materials, recovery of materials for other uses, hazardous waste.

## Applies to all sub-contractor generating paper waste:

## **Waste Paper**

The annual amount of waste paper produced during the converting (including finishing processes) of the ecolabelled converted paper product, divided by annual tonnes of paper purchased and used for the production of ecolabelled converted paper product, shall not exceed 20 % for stationery paper products, envelopes and 10% for paper bags.

Where the finishing processes are outsourced to another company, the amount of waste paper resulting from the outsourced work shall be calculated and declared in the calculation

- Please, refer to the description of the calculation of the amount of waste paper.
- Please, refer to the declaration from the contractor collecting the waste paper from the printing house.

#### **CRITERION 8 - TRAINING**

## REQUIREMENTS: Conform / Not conform

All members of staff participating in day-to-day operation participated on a training programme, to ensure that the EU Ecolabel requirements are fulfilled and continuously improved.

- Please, refer to the details of the training programme, its content.
- Please, refer to the list of staff have received what training and when.
- Please, refer to sample of training material.

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