



EUROPEAN COMMISSION
DIRECTORATE-GENERAL
ENVIRONMENT
Directorate C - Sustainable Resources Management, Industry & Air
ENV.C.1 - Sustainable Production and Consumption

MINUTES OF THE EUROPEAN UNION ECOLABELLING BOARD (EUEB) MEETING

Albert Borschette Centre, 8 June 2011 – meeting on product groups

- 13:30 – 16:00** **Discussion on criteria documents:**
Newsprint and Printed Paper - Michele Galatola (EC)
- 16:00 – 16:30** **Presentation/discussion on criteria**
development/revisions by the Joint Research Centre: see
attached
- 16:30 – 17:00** **Presentation/discussion on criteria development: Laundry**
detergents and Detergents for dishwashers for professional
use – Jakob Waidtlow (Danish Standards)

1. DISCUSSION ON NEWSPRINT AND PRINTED PAPER

President introduced the discussion on the newsprint and printed paper criteria - are being established for over 5 years now.

COM explained the background of the two criteria documents. As a result of a lack of agreement on newsprint sub-product group that was a part of the copying and graphic paper criteria the EUEB decided to remove newsprint from the scope of copying and graphic paper criteria. It was therefore decided to work further toward an acceptable agreement and re-introduce the newsprint as a separate product group.

The document presented here today was already discussed at the AHWG in Denmark on the 7 April 2011. Two sets of comments were received – first soon after the Copenhagen meeting and the second on the second version of the criteria.

The document will not be presented with track changes, but stakeholders received two tables - one with closed issues and one with open issues.

Art 1 – no change

Art 2 – what is recycled content and what is the recovered paper. We can have up to 20% losses from the recovered paper that stays in the final product therefore we reformulated the criteria with recovered fibres not recycled fibres.

Art 3 – no change

All the other articles are administrative.

Sentence on transportation and packaging adjusted according to the suggestion from the Italian CB – it was redrafted so it is clear what we mean.

Criterion 1 – no open issue. It was decided during the AHWG to keep Table 1 for the sake of consistency with the copying and graphic paper criteria.

On CO2 we do not have any specific issue, but there is an important clarification.

We introduce this sentence: *For grid electricity, the value quoted (the European average) in the table above 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.*

Open discussion on the issues:

Denmark: we have reservation on this addition. We had discussion in AHWG where we agreed we should not introduce sentences like that but use European averages system. It is a mistake to include it again.

Sweden: I think we agreed in AHWG meeting that we should introduce it.

Denmark: it would also be inconsistent with the copy graphic paper.

COM: From LCA point of view it is a common practice that we have national values. It is partially the reality that the grid is interconnected as more and more the grids are independent. And it is Ecolabel goal to promote the use of renewable energy. Moreover, what is used in LCA studies is not the production energy mix but rather the consumption energy mix. This means that all imports and exports of energy are already taken into account.

The criteria are a dynamic document and if we agree on a change that makes them better we should do it.

Denmark: we should not introduce national averages for electricity, we should use European standards.

The Netherlands: Question to Denmark – did you imply that you cannot choose whether you use renewable energy or coal energy?

Denmark: it is possible to buy green energy, but it will only mean that there is less green energy for other people. We can encourage the paper manufacturers to build energy production facilities to put in more green energy on the market. But just because they get a certificate from a power plant that they now buy 25% more of green energy that will just mean that the small amount of green energy that is on the market will not be available for other people to buy it. So it will not help in this situation. We should have criteria that say if you set up a new power generating facilities producing green energy then you get a smaller value, but just because you gave the green certificate it does not make it greener. I know we have this criterion in different product groups, but we should actually get a rid of it and instead we should encourage increasing the building of green energy power stations – solar energy or wind power.

President: this is a big issue and we are not going to solve this today. It is nevertheless very important that everyone expresses their views.

Italy: We decided to delete this criterion from the copy and graphic paper, since news print criteria are very much similar to those, for harmonisation between these two sets of criteria we should also leave it out. The opinion of most CBs was to remove this criterion.

UK recalls it as well that it was decided to remove it. The question of markets for renewable energy is quite important. I can speak only for UK, we certainly have had the situation that Denmark is referring to, but at the same time we have some green suppliers that are dependent on a switch of demand to them in order that they can invest in the renewable electricity supply installation, so I am not sure that I agree with Denmark. This is an opportunity for the Ecolabel to develop and support the demand that we need to see throughout Europe for renewable energy power plants and power sources.

The Netherlands: the difficulty here might be that member states have different policies on this. In the Netherlands the creation of renewable energy power plants depends, to a large extent, on how those subsidies are organised. Also it depends on whether you have the system for guarantee of origin or not. All this factors make the issue quite complicated. Netherlands agrees with UK on this and not sure whether agrees with Denmark.

EEB and BEUC: supports all criteria that will promote renewable energy.

President: I think we found another horizontal issue that should be solved for many product groups, but this will be the end of the discussion for today.

COM: Discussion on Table 3 - Mechanical pulp and Recycled fibre pulp - difference in fuel consumption. We propose that the reference fuel values shall be changed in a way that reflects the typical fuel consumption for different pulps.

We have differentiation between fuel and electricity, but also between air dry pulp and non air dry pulp. The new values are consistent with the Nordic Swan criteria.

However, recycled fibres pulp value differs from the Nordic Swan criteria, so we would like to hear your opinion on this today or in the coming days. What value should be used

in our criteria? Should it be closer to the Nordic Swan criteria that are not yet finalised, but with recent data representative of certain parts of Europe. Or should we refer to the BREF? Values that are very old, because they refer to date of about 10 years ago, but they are more representative of the European average value. This is true both for the fuel value and for the electricity value.

Do you agree with the new layout of the Table 3? (Differentiation between non air-dried and air dried, and chemical and mechanical pulp)?

What is your opinion about recycled fibres pulp values for fuel and electricity?

Discussion

EEB and BEUC: we believe that more recent data should be taken into consideration.

CEPI: What is the TMP value in the copy and graphic paper criteria?

COM: 1800 for fuel, for electricity is 800.

Denmark: We will have to get back to our experts with this.

COM: Next subject Criterion 3 Fibres – it was the most discussed at the AHWG meeting. The previous criterion was proposing that at least 50% of recycled fibres shall be used for newsprint, as a mandatory requirement. And all fibres that are not recycled shall come from sustainably managed forests.

50% was referring to recycled fibre and recycled fibre is understood as the amount or recycled material that stays in the final product. We decided to replace the term 'recycled' with 'recovered' having in mind that 50 to 20 % of the recovered fibre is lost in the production process, we increased the value to 70%.

A number of stakeholders consider that this approach might not be optimal from the environmental point of view, because there are countries that do not have enough recovered fibre available, so they might be in a position to import paper from other countries if they want to get an Ecolabel. There are no studies that analyse this aspect.

At the same time this criterion makes a lot of sense in countries where the recovered fibre are available.

Swedish CB proposed an alternative approach to keep the final objective of using as much of recycled fibre as possible, but at the same time keeping in mind constraints that we may have in some countries.

Power point presentation – new proposal, based on Sweden's suggestion.

Countries who recover fibre will have to have higher mandatory content. Countries that don't collect fibre will be encouraged to collect more fibres.

Discussion

Denmark: this is the same situation as the green energy, strange criteria that might not fit into the market. We will support it, but I think it is a wrong approach to set the minimum demand of recycled content. We should have perhaps to set more stringent criteria on energy. We should encourage the use of recycled fibre by setting harsh criteria on virgin fibre. This might create higher demand for recycled fibre and push its prices up.

EEB and BEUC: We would like to have 80% of recycled postconsumer paper in the newsprint. We think that different criteria, for different countries will be confusing for consumers we are not in favour of this. Such criteria will not help to build consumers trust in the Ecolabel.

COM: re-explained the difference of recovered and recycled paper.

Recovered fibre – whole amount of fibre that enters the boundaries of a mill before being processed, not all of those fibres will be usable, because, for example, they have too many impurities, or for any other technical reason. There is a natural loss in the process.

Recovered is what enters the mill, recycled is what stays in the final product. The difference is the losses between the two. So if we are asking for 80 recycled fibres, that mean that, if we account for 20 losses, we are actually asking for 100% recovered fibres.

CEPI: In my opinion it is not a proposal for newsprint, but a proposal for newsprint made from recovered paper. The proposal is for all of Europe not only the countries that have high amount of recovered fibre, so I support the current thinking of the Commission. The current proposal will not increase the paper recovery, but it might lead to greater transport of fibre as explained by CEPI.

Germany: 70 % of recovered fibre is the maximum we can agree on, if we go lower Germany will vote negative. Not every paper producer should be able to obtain the Ecolabel, it should be the best 10 to 20%. The 70% is already a compromise, and we should not go further.

Norway: some people seem to think that we are making alternative criteria because some countries are not recycling enough paper. The problem is however that in the countries where the paper is made there is not so many people and we cannot collect more than 80%. In order to make a recycled newsprint paper, the factories are actually depending on getting in recycled fibre with a lot of virgin fibre in it from the start, so in many countries you cannot go on producing newsprint from 100% recycled fibre, unless you get a very good quality fibre coming to the factory in recycled paper. Without good virgin fibre coming into the cycle the supply of suitable recycled paper will run out after a few months. It is a Ecolabel for Europe, so it is very important that it is suitable for all countries in Europe, so there is a need for alternative criteria, this is a start, but we will have to work a bit more with it. We will have to think in new ways when developing these criteria for newsprint paper.

Paper Industry: This is a European issue. We need fresh fibre into the paper cycle otherwise we will not have fibre for recycling after a short period of time. I wonder when hearing that only 10, 15% of the market should get the label, is the basis for that? Is it environmental condition, or is availability of recycled fibre, or other conditions? We are not talking about environmental criteria if we are excluding huge part of European newsprint industry which does not have access to enough recycled fibre. We are risking the recycled fibre will be shipped all around Europe and we are not increasing recycled fibre by doing so. What will be shipped to the Nordic countries will not be available for companies in Germany or Belgium. Neither does then the Nordic countries feed the fresh fibre into the cycle, when using more recycled fibre. I do not see the logic here, and I fully agree with what Norway just said that we need to rethink this.

We will not increase the volume of recycled fiber, we will just cause transport of fiber around Europe.

CEPI: I think the proposal from Sweden is very interesting as it moves us in the right direction. The amount of recovered paper on the market is limited. With green electricity when there is a signal for more demand, there will be investment to produce more green electricity. But nobody produces recovered paper it is collected from people's consumption therefore the total amount that can be collected is limited by

people's nature, depending on how much they consume and how much they put in the right bin, and how much the local authorities support the collection schemes. As an industry we are happy to support collection schemes, nevertheless the total amount of recycled paper is limited by what can be collected. We would also promote any ban on land filling paper that can be collected. But I understand that it would be very difficult criteria here to verify.

For now, what we can do is to have a mechanism that supports collection and that is why Swedish proposal is interesting, but I also we understand that it would be difficult to verify by CBs.

But any criteria that leave the responsibility for manufactures of paper to say that use more is not going to work because there is no more to be used, everything is already being used. Germany's remark is astonishing.

Czech Republic: we may penalise some of the companies for something that they cannot affect by themselves. How can they influence what percentage of paper is recycled or not?

UK: We just want to echo Germany's comments, in particular the 70% of recycled fibre, that is proposed in the latest criteria document, is a significant compromise for us too, and if it was going to be diluted, we would find it very difficult to support the criteria. Secondly, the Swedish proposal seems to be referring to paper, we need to be clear what we mean by paper. Are we talking about post consumer, used paper, or are we talking about magazines, periodicals etc. One of the important features of the UK newsprint mills that are using 100% of recovered fibres in the UK, is that they are constantly refreshed by periodicals and magazines, which are predominantly made of virgin fibre, so although they are using 100% of recovered fibre there is a significant percentage virgin in there.

We are talking about most beneficial environmental practices and from our prospective that is the use of recovered fibres for newsprint production. Newsprint has a life usually of 1 day, it is constantly in high turnover and renewed, therefore it would be very appropriate destination for recovered fibres. And the studies that show different disposal routes show that the recycling is the most preferred from the environmental prospective and I think all companies in Europe that are producing newsprint agree with this. And certainly our mills that are producing newsprint and are using 100% of recovered fibre are owned by Swedish or Finish, or German companies. It is also clear from the sustainability reports that there is a trade across Europe in waste paper, and Hollemans make a specific reference to the fact their ships would otherwise come back empty from the UK if they did not bring waste paper to use in their newsprint mills in Scandinavia. My concerns are that we are making something very complicated when the evidence is very clear, and the proposal that the Commission already put forward is indeed a significant compromise which meets the majority of states and companies interest.

UPM: General comment about the whole discussion, what is good in the EU Ecolabel is that it takes into account the whole lifecycle. We have to remember that recycled fibre is just one of the criteria. Paper with 100 % recovered fibre is not necessarily the most environmentally friendly, other factors also have to be taken into account.

Germany: To answer the earlier question. In EU Ecolabel we do not have a mandatory requirement of recycled paper in the copy and graphic paper criteria because we respect the situation that it is difficult, especially for the Nordic countries, to have enough recycled paper. I did not want to say that the recycled paper currently used for hygienic paper or copy and graphic paper should be used for newsprint, this was not the

argument, but these are possibilities where you use the recycled fibre. Currently the utilisation rate for the CEPI producers for recycled fibre is over 90% input in the process then the final content is less and now the final requirement is 70% input in the process. By doing so we go back with our criteria on what is already the situation. I do not get these figures together. If 90% of recycled fibre is already used in newsprint then I don't understand where the problem is.

Austria: supports the position of Germany and UK.

France: supports Germany, UK and Austria; 70 % is a significant compromise for us too. It will be difficult for us to vote positively if there is a further decrease. Just for information according to French Confederation of Paper Industry, magazine and newspapers have utilization rate of 70% of recovered paper in France, and this rate is steadily increasing.

Finland: we have discussed this issue in Finnish Ecolabelling Board, and we can compromise to 50 % of recycled content. Maybe we can accept the current proposal of 70% of recovered paper. We might accept this as a compromise.

CEPI: talking about the studies that UK mentioned we fully support these studies. But we have no studies that indicate that is better to produce paper from recycled content and not from virgin fibre content, if the fibre is coming from sustainable sources, certified forests, etc. If any of you have these studies I would be very happy to see them, but I don't think they exist. COM also said in the beginning that for introducing this kind of mandatory content there is no assessment of what it would mean, and I think this is a problem. I know some studies from Germany, that say if you are producing in Germany it is better to use the recovered paper that you can collect from the big population in Germany where the collection is well organised. But I do not know whether we have any scientific support for this.

Secondly I would like to ask the Commission how many other product groups you do have where recycled mandatory content is included, and what are the reasons for those products that it was included. Is it because the producers are reluctant to take it in? Or is it there for other reasons? Because in our case we are not reluctant to use recovered content, we use everything that is available and we would like to use more.

Holmen Paper: I just want to say that we have two paper mills in Sweden and one in Spain and the one in Spain uses 100% of recovered paper. One of the mills in Sweden also uses recovered paper and we are importing about 50% of recovered paper needs, but spite of that we cannot fulfil the requirement of 70% of recovered paper content in our newsprint production so we are automatically disqualified from the participation in the Ecolabel scheme, even if we fulfil all the other demands. Is that fair?

Spain: we support Germany and France. We would like to have Ecolabel for paper high in recycled fibre.

COM invited the participants to try to come to a compromise, so we can finally establish this product group.

I want to clarify something, when I say that there is no studies, what I mean there is no study saying that in a country like for example a Nordic country that is forced to import recovered paper, it is better to use this recovered paper. There are studies that in countries where you are importing virgin fibres, it is better to use recovered fibres – that is the kind of studies we do have, but we do not have the other way round.

Criterion no 4 – no change.

Open issue – on ionic impurities and dye stuff.

Comments from UK - asked two different things – table is shown.

List should include cadmium.

Extensions on organic pollutants.

President: Floor is open for comments

EEB: we would like to move back to Criterion 4 – it seems that wording excluding nano forms has been deleted and we would like to have it back.

COM: this is an editorial problem, it will reappear.

If there are no more comments then I will introduce this addition in the text.

Criteria 5, 6 and 7 - no change.

Sweden: In criterion 6 it says that the product shall fulfil the requirement for permanence, since this is for permanence of paper that should last long this does not seem to be applicable to newsprint. Perhaps these parameters should be checked.

COM: There was a proposal from EEB to introduce criterion on waste water, we did some work on that, we took a reference that we found in BREF (open issues table).

Since this is quite technical, we don't want to open the discussion now, but if you would like to take a look in the coming days and come back to us in writing, expressing your opinion whether this criterion is needed or not, and if yes, then whether this particular wording/values are acceptable. We would like to receive those comments by 17 June.

President: that is the end for the Newsprint product group discussion. Next – printed matter.

COM suggested to focus on the open issues.

Article 1 – the scope of the criteria.

There is no change since our discussion at the AHWG.

There were a number of comments coming on this from different stakeholders we tried to address them in writing.

President: Floor is open for comments.

European Newspaper Publishers Association: Procedural remark, we have never been invited to the AHWG meeting. I have just received yesterday the documents for this meeting. We only heard on the 11 of April that books and newspapers will be included in the scope of the criteria and we were really surprised to hear that, as we were not involved until now. Perhaps the Commission can comment on that.

COM: we have been discussing these criteria since 2004, and all the stakeholders have been involved in the discussion since then, including the association that you represent. We have put all the information related to the development of these criteria, including the dates of the meeting that open to everyone on the Ecolabel website that is public. We sent the invitation and the documents to all the stakeholders that were in contact with us at some stage in the development process. Everyone who expressed desire to be involved in the process was included in our mailing list. In addition the criteria are not very different from the ones that were discussed at the previous working group in 2009.

ENPA: there is a discussion on Ecolabel for European printed editorial press content products and you are not inviting the main stakeholders to the discussions. Now the

proposal will go to the inter-service consultation and we have not been involved. In our letter addressed to Commissioner Potocnik, from the 7th of April, we asked to remove editorial press content from the scope of this Ecolabel until we have our input. We know we have been involved in the previous discussions, in 2005, 2006, 2007, and also then the ENPA and European Publishers Association have been opposed to these criteria. Our industry went through structural changes and the Ecolabel could have an impact on our businesses.

COM: in the letter to the Commissioner you mention that you never received information or feedback from us, and we have given you a copy of the letter that was sent from the Commissioner to you, so you were stating something that was not correct. So please before making such statement please check two or three times. This is a public, open, stakeholder consultation nothing has been set in stone, we had bilateral meeting with you recently, and we are here again to listen and to discuss all positions.

COM asked the ENPA to address the real problem that is obviously the scope of the criteria instead of trying to criticize the procedure that has been correctly followed.

Article 1 should we say newsprint.

Intergraf: we would like to know whether screen printing is covered by the scope of the document or not. From some parts of the criteria it seems it is covered, but in other parts it is not so obvious, we would like a clarification on that.

EEB and BEUC: we would like to ask for criteria for other components, as in printed matter, only 80% is paper, so we would like to have minimum criteria on other components.

COM (DG Enterprise): maybe we should better explore synergies with other policies (REACH, resource efficiency etc.) we should balance technicality and practicality in formulating criteria.

COM: to DG Enterprise – if you have an idea on how to explore these synergies please let us know. EEB – if you have an idea for a criteria please come up with a suggestion.

Representative of two federations of French industries who represent all the manufacturers of European stationary products. The association was interested in the EU Ecolabel for a long time. So much so that 6 years ago we had created an association called Paper by Nature open to NGOs and all the stakeholders and we dedicated to promote low environmental impact stationary products. In the last three years the Paper by Nature label covers 30% of stationary products. Regarding the EU Ecolabel for printed paper, this draft is very general, and covers very different types of products, and consequently the stationary products could not be certified with the Ecolabel and it was a problem for us.

And there are problems in the new criteria 80% of paper content, references to copy and graphic paper criteria, as well as waste criteria.

We would like to create a specific product group for stationary items and we would like to offer to develop these criteria in consultation with the Member States and all stakeholders. Therefore we propose to exclude stationary products from the scope of the printed paper products criteria, as they will be included in the new set of criteria that we are proposing to develop.

COM: Re question regarding screen printing – our intention is to cover it, if it is not sufficiently covered, your comments are welcomed to improve the criteria.

COM Re: new product group – before deleting anything we should first decide with the EUEB whether to develop this new product group.

Art 2 – definitions article.

Definition of packaging (from EU Directive on packaging).

The VOC definition is according to EU Guideline 1999/31/EC. It seems that EU Guideline 2010/75/EC would fit better to this since the specific printing methods are also covered by this guideline.

French Paper Industry: The VOC definition is a difficult subject, we would prefer to stick to the traditional definition.

EEB and BEUC: we would like to come back to the inserts issue, we think they should not be included in Ecolabel products due to the fact that they are hard to recycle. Cream samples for example, are not recyclable.

COM: currently the Ecolabel criteria do not cover loose inserts, unless the Ecolabel logo is to be used on it, and in that case they have to fulfil all the criteria for the printed paper.

I would like to know whether there is a reason for sticking to the old definition, since there is one more recent European Directive as a rule we should be making references to the most recent ones, unless there are technical reasons not to.

ENPA: we asked newspapers not to be included in the scope of the Ecolabel because of the special role of the printed paper in democratic state. Newspapers inform readers about democratic, political discussions at international, EU and national level, they inform their readers about environmental policies, about environmental impact of product groups, about Ecolabel. The reader chooses a newspaper because of its content and we feel that the reader should continue choosing a newspaper on basis of the content and not its environmental impact.

We ask the Commission not to include newspapers in the scope of the criteria.

Magazine Industry: We agree with my predecessor, we have 15 thousands magazine publishers as members, and 95% of our members are SMEs, the cost represented for possible adaptation to Ecolabel is posing a problem for them. We think that the only criteria for choosing a magazine should be journalistic content and not Ecolabel on the final product.

Denmark: we have in Nordic countries criteria for printed matter for decades now and we never had discussion on freedom of speech, and other arguments that can be put forward. For this product group it is the publisher who would like to add the Ecolabel to newspaper or magazine, it is similar to FSC label, would you ban that too? It is an awkward discussion and I cannot see that it has anything to do with Ecolabel criteria development.

BEUC: Ecolabel can be an additional criteria in choosing which newspaper magazine to buy, we should leave the choice to consumers.

President: We took the point from the industry they don't want the Ecolabel to go into this field, however, this is not mandatory, publishers may stay outside the system. We will later ask the EUEB whether there is a strong opinion in this matter so we can send some signals to the Commission whether we would like to have magazines and books in the scope, or if it should be outside.

COM: Moving to the technical criteria.

Denmark: question on Criterion 1, assessment and verification part, last line – licence for printed paper will be issued for time limited by validity of paper certificate. That will be very difficult for CBs to control. How would it work in practice?

I think we should delete this sentence and add one saying the Printing House will only print on Ecolabel licensed paper and this is what CB should be controlling.

Denmark: We are surprised with Criteria 1a and 1b – we are putting big constraints on the license holders by demanding them to use Ecolabel paper, as far as I understand.

COM: we already had this discussion in the AHWG and the conclusion was to stay with the EU Ecolabel. There are lots of constraints in referring to other ecolabels and not the lack of willingness. We considered this issue closed.

European Printers Association: The condition should be that the paper used should fulfil the criteria, but not necessarily have the Ecolabel, as this is very costly.

Norway: At the AHWG we did not discuss this issue in great detail, but it is a big and important issue for us for several reasons, Nordic Swan is always including European Ecolabel in their criteria for printing houses for instance.

I would go very much against saying that the paper must only fulfil the criteria for Ecolabel paper, because that would mean that the Competent Bodies would have to assess the paper, so it is even bigger cost for the Competent Bodies, and it is actually the same for the paper producers because it is their responsibility to demonstrate that they comply with the criteria, so it is the same job, whether you have the label or not.

COM supports Norway in saying that just complying with the criteria is not enough, for ISO type one – we thought it would be very difficult to verify every licence holder, and also the criteria may differ, from EU Ecolabel, Nordic Swan and the Blue Angel, so you would end up with very different printed products at the end. But how we can make sure that we keep track of expiry dates?

Norway: it can be done like with organic cotton - we will ask for a certificate. Concerning the difference in the criteria, we recognise the other ecolabels in Nordic Swan.

COM: we will keep the previous formulation of the criteria before the AHWG.

Coffee break

COM: We will focus on open issues now. There are certain issues on which we have not received any comments. If we do not receive any feedback by the end of next week, we will have to make the decisions ourselves.

Criterion 2 – Excluded or limited substances and mixtures

Request for derogation of R65 products – I did not receive any feedback on that.

EEB and BEUC: it was not very clear, why it should be derogated, we do not think it should be derogated.

COM: we will get back to stakeholders and ask them to clarify why it should be derogated.

French Industry: R65 has a connection with UV inks if I am right, and UV inks are in turn connected with screen printing.

COM: next question relates to UV inks and UV varnishes. I received many emails that substances classified with R52-53 should get derogation, because they are

environmentally friendly. I would like more clarification on that. The criteria says that if the product is not harmful then it is automatically allowed to use, so in my view this is already covered.

No comments from the floor.

Next is request from Germany:

Azo dyes

It need to be assessed, in how far azo dyes can also be applied in printing or if they are only used for colouring paper during the production process of paper. In case azo dyes could also be used in printing criteria 4h) on azo dyes of the criteria document on newsprint paper need to be included also in the criteria on printed paper

We would like to get a bit more information on this.

Criterion 3 Recyclability – request from Hamelin for a number of amendements:

Wet strength agents: excluding drawing pads designed to resist to water in paint (aquarel) and excluded envelop design to resist to rain water.

Most of envelope needs wet strength agents.

Amendment: Coating varnishes and lamination, including polyethene and/or polyethene/polypropylene, may be used only for covers of books and Pads and catalogues, exercise books, binders and folders.

Amendment: This criterion shall not apply in diaries to cover removable designed to be reused.

UK: We have to be very careful about the phrase 'shall be recyclable'. If we do not have a way of assessing and verifying this criterion we should delete it.

Denmark: Criterion no 2 – delete 'where applicable'.

Hamellin: I do appreciate that it should be something you can verify, but the concept of recyclability is extremely important, and I think it does not harm to have it there. It is also a reminder that on of the essential sustainability criteria for paper products is that it is recyclable. The main criteria on de-incability is already there. We have recently adopted another criterion which is removability of adhesive applications; we will soon send it to the Commission.

COM: I take from the discussion that the recyclability criterion should not disappear, as it is fundamental for the paper parts of this product. And if there are no strong resistance to the two suggested exclusions, I will add these two exceptions to the criteria.

UK: if this is the case, then we ought to say – the printed paper shall be recyclable and de-inkable? Rather than the printed paper product, because when we are talking about paper product we are talking about non paper parts as well.

COM: Another request from Hamellin amendment: This criterion shall not apply in diaries to cover removable designed to be reused – that is already part of the criterion.

Criterion 5 – Waste

One change - 15% as a maximum value for gravure printing.

Intergraf: the figure for sheet offset – 23% is still too demanding.

COM: before considering any change, I need more supporting information.

Denmark: I have a question for number X which is defined as any annual tonnes of waste paper produced during the printing (including finishing processes) of the ecolabelled "printed paper" product, divided by annual tonnes of paper purchased and used for the production of ecolabelled printed paper product – is that for the entire printing site, or is it only for the product that is going to be ecolabelled.

COM: the second one, the idea is that it should only cover the product that is going to be ecolabelled.

Denmark: then we will have a practical problem – it is absolutely impossible for a printing house to document, and it is even more impossible for a CB to control the process afterwards. So how you are going to solve that?

COM: nobody from the printing houses raised that point, but are there any comments from CBs?

Finland: I have received a comment from Finish Printers Association that it is never done by product, it is always the total amount they produce.

Denmark: Very quick solution would be to say that the X covers the whole site, and then you also have the correct percentage when you refer to the Swan system, because we are handling paper waste from the whole site, so it is possible to calculate for the whole site.

COM: we will consider that, one request coming from France – to facilitate the task of competent body, do you think that we can propose some example of test to prove the fitness for use of the product – test in the label NF Environment (NF ISO 2471 (determination of opacity)). I have not received any feedback on that.

France: we can send some documents from the national label NF. We had a discussion yesterday in the CB forum, it is very difficult to verify this kind of criteria without having reference to a test.

COM: No opposing comments from other CBs, so it will be taken on board.

Italy: I know there are no specific criteria on the 10 – 20% of product which is not paper, but should this part fulfil general criteria, such as for example criterion on hazardous substances. Should we ask for a declaration on that, or is it just not covered at all.

COM: what we have to consider is how feasible it is for an applicant to have the information on all those 20% components.

Intergraf – European Printing Industry: Can you confirm that proposal from Océ Printing Systems is not taken into consideration, as it will give a significant advantage to digital printing.

COM: Based on the discussion we had here today and in the previous days, we can confirm that we will keep this criterion as it is now.

EEB and BEUC: as we really would like to have some kind of criteria that covers this additional 20% of non paper content, we can think of perhaps adding a general criterion applicable to additional the 20% saying that we do not want PVC, heavy metals, CMRs. The supplier should be obliged to give information whether there are any substances from the candidate list – so perhaps this can be some kind of very rough criteria.

COM: if any of the stakeholders have a good idea on how this criterion can be formulated please let us know and we will evaluate that.

President: Do you think it is a good idea to give opinion on the scope of this product group?

If you think it is a good idea then we will go ahead and see whether we can give a recommendation to the Commission.

The EUEB gives favourable opinion on the broad scope of the product group that includes newspaper, magazines and books.

2. PRESENTATION/DISCUSSION ON CRITERIA DEVELOPMENT/REVISIONS BY THE JOINT RESEARCH CENTRE: SEE ATTACHED.

New product groups: Imaging equipment, Taps and Showerheads, Heating systems, Buildings

Ongoing revisions of: Soaps and Shampoos, Textiles, Bed mattresses, Paints and Varnishes

3. PRESENTATION/DISCUSSION ON CRITERIA DEVELOPMENT: LAUNDRY DETERGENTS AND DETERGENTS FOR DISHWASHERS FOR PROFESSIONAL USE – JAKOB WADTLOW (DANISH STANDARDS): SEE ATTACHED.