**Scope**

This sheet covers procurement actions for the purchase of **copying and graphic paper**. This encompasses unprinted paper for writing, printing and copying purposes (up to 170g/m²) sold in sheets or reels.

Finished paper products such as writing pads, drawing books, calendars, manuals, etc. have not been included. The criteria are taken from the European Ecolabel¹, the Nordic Swan label² and the Blue Angel label³.

---

Different sets of criteria are proposed for:

- Paper based on recovered paper fibres, recycled paper (focus of the Blue Angel label)
- Paper based on virgin fibre (focus of the European Ecolabel and the Nordic Swan label)

Contracting authorities are recommended to make reference to both sets of criteria, as alternative ways of achieving the objective of purchasing environmentally friendly paper, to maximise competition and avoid discrimination.

### Key environmental impacts

<table>
<thead>
<tr>
<th>Impact</th>
<th>GPP Approach</th>
</tr>
</thead>
<tbody>
<tr>
<td>Forest destruction and potential loss of biodiversity</td>
<td>• Procurement of paper based on post-consumer recovered paper fibres (recycled paper) or paper based on legally and/or sustainably harvested virgin fibre</td>
</tr>
<tr>
<td>Emissions to air and water during pulp and paper production</td>
<td>• Procurement of paper produced through process characterised by low energy consumption and emissions</td>
</tr>
<tr>
<td>Energy and water consumption during production</td>
<td>• Avoidance of certain substances in paper production and bleaching</td>
</tr>
<tr>
<td>Chemical consumption during production</td>
<td></td>
</tr>
<tr>
<td>Waste generation during production such as rejects and sludge</td>
<td></td>
</tr>
</tbody>
</table>
### Paper based on recovered fibres - GPP criteria

#### 3.1 Recycled option - Core GPP criteria

*Note:* Where the criteria are different for paper for professional printing purposes, this is noted in the final column of the table.

<table>
<thead>
<tr>
<th>Subject matter</th>
<th>Paper for professional purposes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Purchase of recycled office paper made from 100% recovered paper fibres.</td>
<td>Purchase of recycled office paper made from at least 75% recovered paper fibres.</td>
</tr>
</tbody>
</table>

**Specifications**

1. Paper must be made from 100% recovered paper fibres. Recovered paper fibres include both post-consumer recycled fibres and pre-consumer recycled fibres from paper mills, also known as broke. Post-consumer recycled fibres may come from consumers, offices, printing houses, bookbinders, or similar.
   **Verification:**
   - All products carrying any type I ecolabel, such as the EU Ecolabel can serve as means of proof if it is specified that the paper is made from 100% recovered paper fibres. Any other appropriate means of proof, such as a technical dossier of the manufacturer or a test report from a recognised body will also be accepted.

2. The paper must be at least Elementary Chlorine Free (ECF). Totally Chlorine Free (TCF) will also be accepted.
   **Verification:**
   - All products carrying the EU Ecolabel will be deemed to comply. Other national type I ecolabels fulfilling the above criterion can also be accepted. Any other appropriate means of proof, such as a technical dossier of the manufacturer or a test report from a recognised body will also be accepted.

3. In order to guarantee the suitability of the paper offered for office machines, a sample of the product must be provided to the authority to conduct quality tests.
   **Verification:**
   - Same

**Note:** Where the criteria are different for paper for professional printing purposes, this is noted in the final column of the table.
3.2 Recycled option - Comprehensive GPP criteria

*Note:* Where the criteria are different for paper for professional printing purposes, this is noted in the final column of the table.

<table>
<thead>
<tr>
<th>Subject matter</th>
<th>Copying and graphic paper for normal office use</th>
<th>Paper for professional purposes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Purchase matter</td>
<td>Purchase of recycled office paper made from 100% recovered paper fibres.</td>
<td>Purchase of recycled office paper made from 75% recovered paper fibres.</td>
</tr>
</tbody>
</table>

### Specifications

1. **Paper must be made from 100% recovered paper fibres, with a minimum of 65% post-consumer recycled fibres.**
   - Recovered paper fibres include both post-consumer recycled fibres and pre-consumer recycled fibres from paper mills, also known as broke. Post-consumer recycled fibres may come from consumers, offices, printing houses, bookbinders, or similar.
   - **Verification:**
     - All products carrying a type I ecolabel, such as the EU Ecolabel, can serve as means of proof if it is specified that the paper is made from 100% recovered paper fibres. Any other appropriate means of proof, such as a technical dossier of the manufacturer or a test report from a recognised body will also be accepted.

2. **The ecological criteria of the EU Ecolabel, or other type I national ecolabels directly related to paper production (and not the management practices of the factory) must be met.**
   - Full criteria documents available at:
   - **Verification:**
     - All products carrying the EU Ecolabel will be deemed to comply. Other national type I ecolabels fulfilling the listed criteria can also be accepted. Any other appropriate means of proof, such as a technical dossier of the manufacturer or a test report from a recognised body will also be accepted.

3. **In order to guarantee the suitability of the paper offered for office machines, a sample of the product must be provided to the authority to conduct quality tests.**

1. **Paper must be made at least from 75% recovered paper fibres, with a minimum of 80% post-consumer recycled fibres.**
   - Recovered paper fibres include both post-consumer recycled fibres and pre-consumer recycled fibres from paper mills, also known as broke. Post-consumer recycled fibres may come from consumers, offices, printing houses, bookbinders, or similar.
   - **Verification:** *Same*
### 3.3 Recycled option - Explanatory notes

#### Explanatory notes

- **Whiteness level**: The authority may choose to use a whiteness level of less than 90. Above 90 the paper would need to be treated with optical brightening agents. Levels as low as 60 are of a good enough quality for everyday office use, but this is a matter of preference.

- **Ecolabel criteria**: It is possible to indicate that the criteria underlying a certain ecolabel have to be met, as long as the criteria are eligible and appropriate for defining the product, and other forms of proof of compliance are also accepted. For more information please see the accompanying [Fact Sheet on the use of Ecolabels in public procurement](#).

- **Inserting detailed criteria**: The complete criteria sets are included in the [Background Product Report](#).

- **Specification or award criteria**: Where the contracting authority is unsure about the price and availability of ecolabelled products on the market, the above specifications can be used as award criteria. Where a points-based evaluation system is used these criteria could for example be given a 15% weighting in the final evaluation. Alternatively carrying out some initial market research may help to indicate whether products are available on the market.
### Paper based on sustainable and/or legal virgin fibre - GPP criteria

#### 4.1 Sustainable and/or legal virgin fibre option - Core GPP criteria

**Copying and graphic paper**

<table>
<thead>
<tr>
<th>Subject matter</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Purchase of office paper based on virgin fibre stemming from legally and/or sustainably harvested sources (also potentially containing a percentage of recovered fibres).</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Specifications</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1. The virgin fibre for pulp production shall come from legal sources.</td>
<td></td>
</tr>
<tr>
<td><strong>Verification:</strong></td>
<td></td>
</tr>
<tr>
<td>Certificates of chain of custody for the virgin fibre certified as FSC⁴, PEFC⁵ or any other sustainable forest management standard where the percentage of certified wood is indicated, will be accepted as proof of compliance for that percentage. The legal origin of wood can also be demonstrated with a tracing system being in place. These voluntary systems may be 3rd party certified, often as part of ISO 9001:2008 and/or ISO 14001:2004 or EMAS management system. If wood stems from a country that has signed a Voluntary Partnership Agreement (VPA) with the EU, the FLEGT license may serve as proof of legality⁶. For the non-certified virgin fibre, bidders shall indicate the types (species), quantities and origins of fibres used in the pulp and paper production, together with a declaration of their legality. As such the fibres shall be able to be traced throughout the whole production chain from the forest to the product. In specific cases, where the evidence provided is not considered sufficient to prove compliance with the requested technical specifications, contracting authorities may ask suppliers for further clarifications or proof.</td>
<td></td>
</tr>
<tr>
<td>2. The paper must be at least Elementary Chlorine Free (ECF).</td>
<td></td>
</tr>
<tr>
<td><strong>Verification:</strong></td>
<td></td>
</tr>
<tr>
<td>A technical dossier of the manufacturer will serve as means of proof.</td>
<td></td>
</tr>
</tbody>
</table>

---


⁶ The FLEGT (Forest Law Enforcement Governance and Trade) action plan was adopted by the EU in 2003. The Action Plan outlines a series of measures to address illegal logging in developing countries. The Plan defines a timber licensing system to guarantee the legality of imported wood products. In order to obtain the license, Voluntary Partnership Agreements (VPAs) have to be signed between timber-producing countries and the EU. Timber products, which have been legally produced in VPA partner countries, will be licensed for the legality of production; more information at: [http://ec.europa.eu/environment/forests/flegt.htm](http://ec.europa.eu/environment/forests/flegt.htm)

⁷ Identified using reports of reliable sources such as [www.globalwitness.org/media_library_get.php/150/0203_The%20Logs%20of%20War_by%20GW_Fafo.pdf](http://www.globalwitness.org/media_library_get.php/150/0203_The%20Logs%20of%20War_by%20GW_Fafo.pdf)

⁸ Identified on the basis of the Corruption Perception Index, based on reliable sources such as [http://www.transparency.org/content/download/10825/92857/version/1/file/CPI_2006_presskit_eng.pdf](http://www.transparency.org/content/download/10825/92857/version/1/file/CPI_2006_presskit_eng.pdf)

⁹ Identified through reliable sources, such as [http://assets.panda.org/downloads/keep_it_legal_final_no_fsc.pdf](http://assets.panda.org/downloads/keep_it_legal_final_no_fsc.pdf)
### Award criteria

Additional points will be awarded for:

#### Sustainable forestry sources

1. Additional points will be awarded in proportion to the amount of virgin wood fibres for pulp production coming from forests that are verified as being managed so as to implement the principles and measures aimed at ensuring sustainable forest management, on condition that these criteria characterize and are relevant for the product. In Europe, these principles and measures shall at least correspond to those of the Pan-European Operational Level Guidelines for Sustainable Forest Management, as endorsed by the Lisbon Ministerial Conference on the Protection of Forests in Europe (2 to 4 June 1998). Outside Europe they shall at least correspond to the UNCED Forest Principles (Rio de Janeiro, June 1992) and, where applicable, to the criteria or guidelines for sustainable forest management as adopted under the respective international and regional initiatives (ITTO, Montreal Process, Tarapoto Process, UNEP/FAO Dry-Zone Africa Initiative).

#### Verification:

All products carrying the EU Ecolabel will be deemed to comply. Other national type I ecolabels fulfilling the listed criteria can also be accepted. Certificates of chain of custody for the wood fibres certified as FSC, PEFC or any other equivalent means of proof, will also be accepted as proof of compliance. Any other appropriate means of proof, such as a technical dossier of the manufacturer or a test report from a recognised body will also be accepted.
4.2 **Sustainable and/or legal virgin fibre option - Comprehensive GPP Criteria**

**Copying and graphic paper**

**Subject matter**

Purchase of office paper based on virgin fibre stemming from legally and/or sustainably harvested sources (also potentially containing a percentage of recovered fibres).

**Specifications**

1. The virgin fibre for pulp production shall come from legal sources.
   
   **Verification:**
   
   Certificates of chain of custody for the virgin fibre certified as FSC\(^{10}\), PEFC\(^{11}\) or any other sustainable forest management standard where the percentage of certified wood is indicated, will be accepted as proof of compliance for that percentage. The legal origin of wood can also be demonstrated with a tracing system being in place. These voluntary systems may be 3rd party certified, often as part of ISO 9001:2008 and/or ISO 14001:2004 or EMAS management system.

   If wood stems from a country that has signed a Voluntary Partnership Agreement (VPA) with the EU, the FLEGT license may serve as proof of legality\(^{12}\).

   For the non-certified virgin fibre, bidders shall indicate the types (species), quantities and origins of fibres used in the pulp and paper production, together with a declaration of their legality. As such the fibres shall be able to be traced throughout the whole production chain from the forest to the product.

   In specific cases, where the evidence provided is not considered sufficient to prove compliance with the requested technical specifications, contracting authorities may ask suppliers for further clarifications of proof.

2. The paper must be at least Elementary Chlorine Free (ECF). Totally Chlorine Free (TCF) will also be accepted.
   
   **Verification:**
   
   A technical dossier of the manufacturer will serve as means of proof.

---


\(^{12}\) The FLEGT (Forest Law Enforcement Governance and Trade) action plan was adopted by the EU in 2003. The Action Plan outlines a series of measures to address illegal logging in developing countries. The Plan defines a timber licensing system to guarantee the legality of imported wood products. In order to obtain the license, Voluntary Partnership Agreements (VPAs) have to be signed between timber-producing countries and the EU. Timber products, which have been legally produced in VPA partner countries, will be licensed for the legality of production; more information at: [http://ec.europa.eu/environment/forests/flegt.htm](http://ec.europa.eu/environment/forests/flegt.htm)

\(^{13}\) Identified using reports of reliable sources such as [www.globalwitness.org/media_library_get.php/150/0203_The%20Logs%20of%20War_by%20GW_Fafo.pdf](http://www.globalwitness.org/media_library_get.php/150/0203_The%20Logs%20of%20War_by%20GW_Fafo.pdf)

\(^{14}\) Identified on the basis of the Corruption Perception Index, based on reliable sources such as [http://www.transparency.org/content/download/10825/92857/version/1/file/CPI_2006_presskit_eng.pdf](http://www.transparency.org/content/download/10825/92857/version/1/file/CPI_2006_presskit_eng.pdf)

\(^{15}\) Identified through reliable sources, such as [http://assets.panda.org/downloads/keep_it_legal_final_no_fsc.pdf](http://assets.panda.org/downloads/keep_it_legal_final_no_fsc.pdf)
### Award criteria

Additional points will be awarded for:

<table>
<thead>
<tr>
<th>Sustainable forestry sources</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Additional points will be awarded in proportion to the amount of virgin wood fibres for pulp production coming from forests that are verified as being managed so as to implement the principles and measures aimed at ensuring sustainable forest management, on condition that these criteria characterize and are relevant for the product. In Europe, these principles and measures shall at least correspond to those of the Pan-European Operational Level Guidelines for Sustainable Forest Management, as endorsed by the Lisbon Ministerial Conference on the Protection of Forests in Europe (2 to 4 June 1998). Outside Europe they shall at least correspond to the UNCED Forest Principles (Rio de Janeiro, June 1992) and, where applicable, to the criteria or guidelines for sustainable forest management as adopted under the respective international and regional initiatives (ITTO, Montreal Process, Tarapoto Process, UNEP/FAO Dry-Zone Africa Initiative).</td>
</tr>
</tbody>
</table>

**Verification:**

All products carrying the EU Ecolabel will be deemed to comply. Other national type I ecolabels fulfilling the listed criteria can also be accepted. Certificates of chain of custody for the wood fibres certified as FSC, PEFC or any other equivalent means of proof, will also be accepted as proof of compliance. Any other appropriate means of proof, such as a technical dossier of the manufacturer or a test report from a recognised body will also be accepted.

<table>
<thead>
<tr>
<th>Ecolabel criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td>2. Products which meet the ecological criteria of the EU Ecolabel directly related to paper production (and not the management practices of the factory). Full criteria documents available at:</td>
</tr>
</tbody>
</table>

**Verification:**

Products carrying the EU Ecolabel will be deemed to comply. Other national type I ecolabel fulfilling the listed criteria can also be accepted. Any other appropriate means of proof, such as a technical dossier of the manufacturer or a test report from a recognised body will also be accepted.
Explanatory notes

- **Paper based on virgin fibre:** In many cases paper available on the market may be neither fully 100% recycled nor 100% from virgin fibre, but instead contain a mixture of sources. The subject matter therefore does not specify paper from virgin fibre but paper based on virgin fibre, allowing the use of recycled fibres for the paper production as long as the specifications defined above are met.

- **Raising the percentages:** Under the EU Ecolabel at least 10% of the virgin fibre must come from certified sustainably managed forests, and under the Nordic Swan at least 20%. The FSC and PEFC can certify also higher percentages that vary according to strict rules. Further information on these schemes and the conditions regarding the use of the logo can be found in section 6 of the background report. Contracting authorities may wish to give additional weighting at the award stage to paper with a higher percentage of certified virgin fibre from sustainable origin and/or recovered paper fibres.

- **Ecolabel criteria:** It is possible to indicate that the criteria underlying a certain ecolabel are met, as long as the criteria are eligible and appropriate for defining the products, and other forms of proof of compliance are also accepted. For more information please see the accompanying Fact Sheet on the use of Ecolabels in public procurement.

- **Inserting detailed criteria:** The complete criteria sets are included in the Background Product Report.

- **Award criteria:** Contracting authorities will have to indicate in the contract notice and tender documents how many additional points will be awarded for each award criterion. Environmental award criteria should, altogether, account for at least 10 to 15% of the total points available.
Cost considerations

The European Commission study on the “Costs and Benefits of Green Public Procurement in Europe”\textsuperscript{16} found that the purchasing costs for public authorities of green (including 100% recycled and eco-certified copying paper) and non-green copying paper are very similar. Comparing the four countries studied, ‘green’ versions of copying paper are significantly cheaper (23%) in Germany; in Spain and Sweden ‘green’ copying paper is slightly more expensive with a relative price difference of 3.5 to 4%; in the Czech Republic the average prices are nearly the same (0.2% difference). The table below presents these results.

<table>
<thead>
<tr>
<th>Country</th>
<th>Price difference between green and non-green product (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sweden</td>
<td>3.5%</td>
</tr>
<tr>
<td>Germany</td>
<td>-23.2% (i.e. the green product is cheaper than the non-green)</td>
</tr>
<tr>
<td>Spain</td>
<td>4%</td>
</tr>
<tr>
<td>Czech Republic</td>
<td>-0.2%</td>
</tr>
</tbody>
</table>

In conclusion, the variations between prices are, to a greater extent, due to differences between different brands and purchased amounts, than due to differences between green or non-green products. Therefore paper that complies with the criteria defined above is available at competitive prices.

6 Relevant EU legislation and information sources


- European Commission’s GPP Website: http://europa.eu.int/comm/environment/gpp

- European Commission’s FLEGT/FLEG Website: http://ec.europa.eu/environment/forests/flegt.htm


- Other ecolabels: http://ec.europa.eu/environment/ecolabel/other/index_en.htm

- PEFC (Programme for the Endorsement of Forest Certification): http://www.pefc.org/internet/html


- CSA (Canadian Standards Association): http://www.csa-international.org


- Danish Environment Ministry timber procurement website: http://www.skovognatur.dk/Emne/Skov/Miljoe/Indkoeb/


