

EU Ecolabel for printed paper, stationery paper, and paper carrier bag products

User Manual

European Commission Commission Decision (EU) 2020/1803 Version 1.0.January 2021

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Using this manual

This manual guides you through the process of applying for an EU Ecolabel licence, in accordance with the applicable criteria requirements. The following symbols are used throughout:

In the second
Image: Clarification of a key point.
 = Documentation on how to fill in the verification form and information about documents to be handed in with the application = Website links where further information can be found

The manual is structured as follows:

Part A: General Information – Provides information about the EU Ecolabel (including a summary of the criteria), details of the application process, and answers to frequently asked questions about applying.

Part B: Product Assessment and Verification – Outlines the criteria for a specific product group set out in the Commission Decision. An example from this section is shown below:

The manual contains the following elements as separate files:

- Part C and D: Application and Verification Form <u>This form should be completed by an applicant</u>. The application and verification form is provided separately as an Excel file. It is designed as an aid to apply for the EU Ecolabel. It includes an outline of all data requested for the product certification, along with tests and documentation that are required to demonstrate compliance. It also includes general information on the product and applicant (application form), and includes the declarations from the applicant for each requirement. In order to facilitate the application process (verification form). The application and verification form can be provided in an electronic form to the competent body.
- **VOCs mass Balance calculator** the tool serves to calculate VOCs emission and verify requirements of criterion 4.2 and/or 4.3.
- Annex I. Declarations from an external suppliers These declarations are to be completed as part of the application and verification process whenever provision of the external or third party information/verification is requested or necessary i.e. in case of an external supplier. The relevant declarations are included in Annex I that is provided as separated file that forms part of the User Manual.
- Part E: Checklist

The applicant shall gather all the declarations from their supplier(s) and provide them to the assessing Competent Body together with the application and verification form. These declarations can also be provided directly from the supplier to the Competent Body. An example of the declaration is given below:



The Declaration Forms from external supplier shall serve as proof of compliance whenever the assessment and verification of the criterion accepts or requires the declaration from an external supplier or third party verification.

Please read this manual all the way through before completing and submitting the application form or any other documentation. EU Ecolabel <u>Competent Bodies</u> can help licence holders understand the EU Ecolabel criteria and can provide guidance on how to assemble an application dossier.



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Introduction

This User Manual¹ is designed to help you apply for the EU Ecolabel. It includes an outline of all data, tests and documentation that are required to demonstrate compliance.

The basis for the manual is a <u>Commission Decision (EU) 2020/1803</u> establishing the ecological criteria for the award of the EU Ecolabel for printed paper, converted paper, and paper carrier bags. A copy of the criteria can be found at:



This document is not aimed to duplicate the content of the criteria but it intends to support their interpretation, and only focused on helpful explanations and clarifications. Each criterion name appears as heading under Part B with a short summary of what documents are needed for the verification of the criterion. The exact criterion text does not appear in this user manual. Only additional information, clarifications and explanations are included.

Please read <u>the criteria document</u> all the way through before completing and submitting the verification form or any other documentation

For general questions about the EU Ecolabel and the application process please check out following pages:

http://ec.europa.eu/environment/ecolabel/faq.html http://ec.europa.eu/environment/ecolabel/how-to-apply-for-eu-ecolabel.html

Part A: General Information

Part A "General information" is a horizontal document for all EU Ecolabel products explaining the different steps of the application process in detail. It has been translated in each Member State language and can be found at:

https://ec.europa.eu/environment/ecolabel/documents.html

¹ This User Manual is for guidance only; it does not have any legal standing and does not, in any way, replace the Commission Decision or any relevant legislation. In case of doubt on specific points in the Manual, please refer directly to the national Competent Body.



Part B: Product Assessment and Verification

1 Scope

The product group 'printed paper, stationery paper, and paper carrier bag products' shall comprise the following products:

- (a) printed paper products that consist of at least 90 % by weight of paper, paperboard or paperbased substrates, except for books, catalogues, booklets or forms that shall consist of at least 80 % by weight of paper or paperboard or paper-based substrates. Inserts, covers and any printed paper parts of the final product shall be considered to form part of the product except for nonfixed inserts (such as flyers, removable stickers) that are sold or provided with printed paper products. If the EU Ecolabel is intended to be placed on non-fixed inserts, they shall fulfil the requirements of the Annex to this Decision. Fixed inserts to the printed paper product (not intended to be removed) shall fulfil the requirements of the Annex to this Decision;
- (b) envelopes that consist of at least 90% by weight of paper, paperboard or paper-based substrates;
- (c) paper carrier bags, including wrapping paper, that consist of 100 % by weight of paper, paperboard or paper-based substrates;
- (d) stationery paper products, including filing 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 to which the ceiling does not apply.

For products referred to in point (a) of paragraph 1 that shall consist of at least 80 % by weight of paper or paperboard or paper-based substrates and for products referred to in point (d) of paragraph 1, the plastic component cannot exceed 10% by weight, except for ring binders, exercise books, notebooks, diaries, and lever arch files where the plastic weight cannot exceed 13%.

The metal weight cannot exceed 30g per product, except for suspension files, folders with metal fasteners, ring binders and lever arch files having a filing capacity of up to 225 sheets where it can be up to 75g and except for lever arch files having a filing capacity of more than 225 sheets, where it can be up to 170g.

The product group 'printed paper, stationery paper, and paper carrier bag products' shall not include the following products or materials:

- (a) packaging and elements adhered to packaging such as labels (with the exception of paper carrier bags and wrapping paper);
- (b) corrugated board;
- (c) food contact materials and articles intended to come into contact with food that constitutes the subject matter of article 1 of Commission Regulation (EC) No 1935/20042;
- (d) products falling within the product group 'tissue paper and tissue products' as defined by Article 2 in Commission Decision (EU) 2019/70;
- (e) fragranced printed paper products, fragranced stationery paper products, and fragranced carrier bags;
- (f) polyvinyl chloride (PVC).

² Regulation (EC) No 1935/2004 of the European Parliament and of the Council of 27 October 2004 on materials and articles intended to come into contact with food and repealing Directives 80/590/EEC and 89/109/EEC (OJ L 338, 13.11.2004, p. 4).



Application and Verification form.

The applicant shall compile product description in Application and Verification Form

Product description (Part C-D: Assessment and Verification form)

() Interpretation of PRODUCT DESCRIPTION:

The table below summarises the limit thresholds for non-paper parts of a product.

Product	Paper substrate content	Metal threshold	Plastic thresho Id	
Printed paper				
Printed paper	90%	x	x	
For books, catalogues,	80%	x	10%	
booklets, forms, ()				
Stationery paper product				
Envelopes	90%	X	X	
Sorters and part files	70%	<30g	<10%	
Tree flap folders				
Filing boxes				
Dividers				
Paper folders, ()				
Exercise books,	70%	<30g	<13%	
Diaries				
Notebooks, ()				
Lever arch Files	70%	75g up to 225 sheets	<13%	
Ring Binders		170g for more than 225 sheets		
Folders with metal	X	75g up to 225 sheets	<10%	
fasteners		170g for more than 225		
Suspension files	X	sheets		
Gift wrapping, paper bags	100%	X	x	

1.1 Definitions

The following definitions shall apply to references throughout this User Manual:

- 'binders' means paper-based products used for storing of documents or magazines and consisting of a cover, usually made of board, with rings for holding loose papers together, including ring binders and lever arch files.
- (2) 'books' means yarn-bound or adhesive-bound printed paper products with hard or soft covers, not including annual reports, journals, brochures, magazines, and catalogues published on a regular basis.
- (3) 'filing products' mean product used for organization, storage and protection of paper documents, including suspension files and arch lever files.
- (4) 'folder' means a folding case or cover used for storage of loose papers including products including indices and dividers, document wallets, square cut folders, suspension files, cardboard boxes and 3-flap folders.



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- (5) 'insert' means an extra leaf or section, printed independently from the printed paper product which is either placed within the pages of a printed paper product and may be removed (non-fixed insert) or bound into the pages of the printed paper product and thus form an integral part thereof (fixed insert) including multipage advertisements, booklets, brochures, reply cards, or other promotional materials.
- (6) 'packaging' means all products made of any material of any nature to be used for the containment, protection, handling, delivery or presentation of goods, from raw materials to processed goods, from the producer to the user or the consumer.
- (7) 'paper carrier bags' mean paper-based products used for the handling or transportation of goods.
- (8) 'printed paper product' means product bearing the printed image resulting from the processing of a printing material printed onto paper and including finishing.
- (9) 'stationery paper products' mean writing and filing materials made of paper, including envelopes and office materials.
- (10) 'wrapping paper' means a paper sheet or roll used for wrapping items such as gifts and parcels.
- (11) 'adhesive application' refers to processed adhesives used in finished paper products (typically applied as films).
- (12) 'cleaning agents' means the following: (a) liquid chemicals used to wash printing forms, both separate (off-press) and integrated (in-press), and printing presses to remove printing inks, paper dust and similar products; (b) cleaners for finishing machines and printing machines, such as cleaners to remove adhesive and varnish residues; (c) printing inks removers used in washing off dried printing inks; not including cleaning agents for cleaning other parts of the printing machine or for cleaning other machines than printing machines and finishing machines.
- (13) 'converting process' means a process whereby a material is processed into a converted paper product, including sometimes a printing process (pre-press, press, and post-press operations).
- (14) 'converted paper product' is a paper, board or paper based substrates, either printed or unprinted, generally used to protect, handle or store items 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.
- (15)'flexography' means a printing activity using an image carrier of rubber or elastic photopolymers on which the printing areas are above the non-printing areas, using liquid inks which dry through evaporation.
- (16) 'fugitive emissions' means any emissions not in waste gases of volatile organic compounds into air, soil and water as well as solvents contained in any products, unless otherwise stated in Part 2 of Annex VII of 2010/75/EU.
- (17) 'halogenated organic solvent' means an organic solvent which contains at least one atom of bromine, chlorine, fluorine or iodine per molecule.
- (18) 'heatset web offset' means a web-fed printing activity using an image carrier in which the printing and non-printing area are in the same plane, where web-fed means that the material to be printed is fed to the machine from a reel as distinct from separate sheets.
- (19) 'laminating' means adhering together of two or more flexible materials to produce laminates.
- (20) 'paper for recycling' means paper waste stream generated during the production of finished product.



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CARRIER BAG PRODUCTS (Commission Decision (EU) 2020/1803)

- (21) 'pressure-sensitive adhesive coatings' (PSA): means adhesives with still mobile molecules on their surfaces, even after setting, can produce sufficient adhesion by pressing their cohesive films (coating) against the surface to be bonded.
- (22) 'publication rotogravure' means a rotogravure printing activity used for printing paper for magazines, brochures, catalogues or similar products, using toluene-based inks.
- (23) 'repulping' means conversion of paper back into pulp.
- (24) 'rotary screen printing' means a web-fed printing activity in which the ink is passed onto the surface to be printed by forcing it through a porous image carrier, in which the printing area is open and the non-printing area is sealed off, using liquid inks which dry only through evaporation.
- (25) 'rotogravure' means a printing activity using a cylindrical image carrier in which the printing area is below the non-printing area, using liquid inks which dry through evaporation.
- (26) 'TVOC' means total volatile organic carbon, expressed as C (in air).
- (27) 'web-fed' means that the material to be printed is fed into the machine from a reel as distinct from separate sheets;
- (28) 'varnishing' means an activity by which a varnish or an adhesive coating for the purpose of later sealing the packaging material is applied to a flexible material;
- (29) 'Volatile Organic Compounds' (VOC) means any organic compounds having an initial boiling point less than or equal to 250°C measured at a standard pressure of 101,3 kPa as defined in Directive 2004/42/EC of the European Parliament and of the Council and which, in a capillary column, are eluting up to and including n-Tetradecane (C14H30).

1.2 Step-by-step walkthrough through the criteria

It is recommended that you start checking internally, if the candidate products can fulfill the criteria. Before you start:

- Make sure the candidate product fulfils all applicable legal requirements of the country or countries in which the product is intended to be placed on the market.
- Download the assessment verification form. Availabel at: <u>https://ec.europa.eu/environment/ecolabel/products-groups-and-criteria.html</u>

1.3 Verification form

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In the assessment and verification form you have to fill in the active fields.

Provide relevant evidence on the status of your company and if applicable EMAS or ISO 14001 certificates. This is related to the application fees.



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1.4 For which products can applications be made?

Check whether the candidate product is in the scope (Article 1 of the Commission Decision (EU) 2020/1803).



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2 Product Group Criteria

The following table summarises all criteria of the Commission Decision (EU) 2020/1804 of 27 November 2020 establishing the EU Ecolabel criteria for printed paper, stationery paper and paper carrier bag product(s).

No.	Criteria
1	Substrate
2	Hazardous substance restrictions
2.1	Restrictions on Substances of Very High Concern (SVHCs);
2.2	Restrictions on substances classified under Regulation (EC) No 1272/2008 of the European Parliament and of the Council ³
2.3	Biocidal products and biocidal active substances
2.4	Cleaning agents
2.5	Alkyl phenol ethoxylates, halogenated solvents and phthalates
2.6	Further restrictions applying to printing inks, toners and varnishes
2.7	Toluene recovery from rotogravure printing
3	Recyclability
3.1	Removability of non-paper parts
3.2	Repulpability
3.3	Adhesives removability
3.4	Deinkability.
4	Emissions
4.1	Emissions to water from rotogravure printing
4.2	VOCs emission from installations covered by Directive 2010/75/EU of the European Parliament and of the Council or equivalent installations
4.3	VOCs emissions from printing processes not covered by Directive 2010/75/EU of the European Parliament and of the Council
5	Waste
5.1	Waste management system
5.2	Paper for recycling from printing facilities
5.3	Paper for recycling from stationery paper product and carrier bags production sites
6	Energy use

³ Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006 (OJ L 353, 31.12.2008, p. 1).



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No.	Criteria
7	Training
8	Fitness for use
9	Information on the product
10	Information appearing on the EU Ecolabel

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

Competent bodies shall preferentially recognise attestations that are issued by bodies accredited in accordance with the relevant harmonised standard for testing and calibration laboratories, and verifications by bodies that are accredited in accordance with the relevant harmonised standard for bodies certifying products, processes and services.

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

Where appropriate, competent bodies may require supporting documentation and may carry out independent verifications or site inspections to check compliance with these criteria.

Changes in suppliers and production sites pertaining to products to which the EU Ecolabel has been granted shall be notified to Competent Bodies, together with supporting information to enable verification of continued compliance with the criteria.

As a prerequisite the printed paper, stationery paper and paper carrier bag product(s) shall meet all applicable legal requirements of the country or countries in which the product is placed on the market. The applicant shall declare the product's compliance with this requirement.

Each criterion needs to be fulfilled.

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

For a product type manufactured on a recurring basis or a product type that will only be manufactured once, the application should address the specific product.



As a prerequisite a product must meet all respectivve legal requirements of the country or countries in which the product is going to be placed on the market.



the criteria (e.g., substrate paper, chemicals, coating and finishing of the printed paper product or amount of waste produced) shall immediately be reported to the respective Competent Body, in order to be approved.



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(i) Interpretation of a PRODUCT LINE:

Product type (or products line) is characterised by the constant production, and is defined as a theoretical product on the base of format, materials, inks, and bindings used, etc.

For this product the license would be given to the product group of certain type that fulfils the general description. If there is any change in the supplier, or in materials or chemicals used it needs to be notified to CB.

Introduction of the product line is a compromise between service and product approach. Its intention is to facilitate the certification of a product that is manufactured on a constant base but which specific design and print content might dynamically change, i.e. the print coverage of leaflets. The assessment of a product line (a type of product) should be conducted based on the worst-case scenario for a defined product line. A representative worst-case scenario sample product for a product line might be theoretical.

The assessment should look at paper, chemicals, printing technique, etc. If a sample product is fulfilling the criteria, each product within the same product line does not need to be re-evaluated. The EU Ecolabel can be used for all subsequent products that comply with the defined criteria for the sample product.

An application can be submitted for a product line of specified type such as e.g. glued brochure of 2 to 30 pages. The sample product must be analysed in reference to all materials and chemicals used, types of paper, the maximum number of pages, the maximum format, all possible types of binding. The application shall include a list of all the printing houses and subcontractors involved in the production of the product, and their geographic locations.

Changes in suppliers, production sites and production process, pertaining to products to which the EU Ecolabel has been granted shall be notified to Competent Bodies, together with supporting information to enable verification of continued compliance with the criteria.



Criterion 1. Substrate

() Interpretation of criterion:

As prerequisite the paper substrate, including paperboard used in a final product shall bear the EU Ecolabel for "Graphic paper" in accordance with Annex I to Commission Decision (EU) 2019/70.

As an alternative form of verification, the proof of compliance could be delivered/accepted directly by a Competent Body that acknowledged the EU Ecolabel certification for the given substrate.

As a prove of compliance the applicant needs to provide a copy of a valid EU Ecolabel certificate for each paper substrate that is used in a final product.

The applicant should also provide the description of the paper used: trade names , amounts of paper used as well as the names of the suppliers of the papers used.

Required documentation for Assessment and verification: Substrate

The applicant shall provide documentation to the Competent Body containing information that proofs the compliance with the requirement.

Declaration in Part C-D: Assessment and verification form (sheet declaration - Criterion 1).

- Description of the paper substrate(s) used in a product including the trade names and amounts of paper used as well as the name of the supplier (sheet declaration Criterion 1).
- Documents that demonstrates compliance with the criterion.
 - Valid EU Ecolabel certificate for "Graphic paper" in accordance with Annex I to Commission Decision (EU) 2019/70.
 - Acknowledgement delivered by a Competent Body that a given substrate is EU Ecolabel certified.
 - Competent body contract appendix with EU Ecolabel licnse number and paper trade name.

EU Ecolabel criteria for graphic paper tissue paper and tissue paper products (Commission Decision (EU) 2019/70): <u>https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32019D0070</u>



Criterion 2. Restricted substances

(i) Interpretation of criterion:

The printing and converting industry is basically an assembly industry of component parts and materials from suppliers. All component parts/materials used, as well as the final product itself, can be considered as "articles" as defined in Article 3(3) of REACH as "an object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition".

In order to demonstrate the compliance with each of the sub-criteria under criterion 2 an applicant should provide a list of all the relevant chemicals used together with appropriate documentation (i.e. safety data sheet and/or a declaration from the chemical supplier).

As a minimum, all process chemicals used by the applicant in relevant printing or converting processes need to be screened.

2.1.: The product shall not contain Substances of Very High Concern (SVHC) in concentrations greater than 0,10% (w/w). All ingoing chemicals used in the production process by the applicant and any supplied materials that form part of the final product shall be covered by declarations from suppliers.

The list of substances identified as SVHC and included in the candidate list in accordance with Article 59(1) of Regulation (EC) No 1907/2006 can be found <u>here</u>. Reference to the list shall be made on the date of application.

2.2. Criterion 4.2 lists restricted <u>CLP</u> classifications and hazard statements. The product, and any component articles therein, shall not contain substances or mixtures in concentrations greater than 0,10% (w/w) that are classified with any of the listed hazard statements unless derogated.

2.3. The product shall not be treated with any biocidal products, including those of type 7 (film preservatives) and of type 9 (fibre, leather, rubber and polymerised materials preservatives).

Only in-can preservatives (i.e. biocidal product type 6: preservatives for products during storage) present in printing inks, varnishes, lacquers and any other formulations used during the production processes and preservatives used for liquid cooling and processing systems (i.e. biocidal product type 11) shall be permitted under specified conditions.

2.4. The cleaning agents used for routine cleaning operations in printing processes need to meet specified conditions. The restrictions do not apply to cleaning agents used in special formulations that are only occasionally used, such as dried ink removers and blanket revivers. The restriction on toluene does not apply to cleaning agents used in rotogravure printing processes.

2.5. APEOs or other alkylphenol derivatives shall not be added to inks, dyes, toners, adhesives, or cleaning agents used for in the printing process or sub-processes used to produce the printed paper, paper stationery or paper carrier bag product:. Alkylphenol derivatives are defined as sub-stances that upon degradation produce alkylphenols.

Required documentation for Assessment and verification

Declaration from an applicant in Part C-D: Assessment and verification form (Sheet: Restricted substances list, and Declaration-Criterion 2.1-2.7).



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A list of process and functional chemicals needs to be supported by safety data sheet and/or a declaration from the chemical supplier.

SDS supporting hazard classification or non-classification. The following information shall be provided to support declarations of the hazard classification or non-classification for each substance identified as being used:

- (i) the substance's CAS, EC or list number;
- (ii) the physical form and state in which the substance is used;
- (iii) harmonised CLP hazard classifications;
- (iv) self-classification entries in ECHA's REACH registered substance database.

As an alternative to the combined declaration available for an applicant in Part C-D: Assessment and Verification form, separate declarations for different types of chemicals that might be used were developed. **These declarations are designated to be filled in by an external supplier**. Declarations are available in Annex I to the User Manual.

As a minimum a list of all the relevant process and functional chemicals used by the applicant in relevant printing or converting processes must be screened:

- Declaration 2.1 -2.2 (SVHCs) of the non-presence of SVHCs above 0,10% and chemical lists and CLP classification.
- Declaration 2.3. Biocidal products and biocidal active substances (optional).
- Declaration 2.4. Cleaning agents.
- Declaration 2.5. Alkyl phenol ethoxylates, halogenated solvents and phthalates.
- Declaration 2.6. Restrictions applying to printing inks, toners and varnishes.

All ingoing chemicals and chemical formulations used in the production process by the applicant and any supplied materials that form part of the final product shall be covered by relevant declarations.

An external supplier of product or chemicals <u>should always provide a declaration</u> of meeting criterion 2.1. and 2.2. (Annex I: Declaration 2.1. and Declaration 2.2.).

As a minimum, all process chemicals used by the applicant in relevant printing or converting processes must be screened.

The assessment and verification of Criterion 2.3. requires the applicant to *declare which biocidal products have been used in the production process, state the nature of the use of the biocidal product (i.e. product type 6 or 11)* and provide copies of safety data sheets and any relevant declarations or test reports *from the manufacturer of the biocidal products.* The external declaration from the producer/supplier of biocidal product or biocidal active substance(s) <u>cannot refer to the actual production process</u> of EU Ecolabelled product. The external declaration can however be used as an aid to support/verify information on the biocidal active substances or chemical formulation used in a production process, if applicable.



(i) <u>Note</u> that for an external supplier, separated declarations (Annex I) can be provided directly to competent bodies by any supplier in the applicant's supply chain.

Criterion 3. Recyclability

(i) Interpretation of criterion:

The Criterion is divided into 4 sub-criteria that are adapted to the type of product

3.1. The non-paper parts of stationery paper product such i.e. metal or plastic elements as metal bars or plastic covers shall be easily removable before entering the paper for recycling stream.



Small non-paper elements such as staples or envelope windows are exempted from this requirement.

3.2. The criterion on repulpability applies to all products. The product shall be suitable for repulping.

Wet strength agents shall not be used except for paper carrier bags and wrapping paper, where they can be used only if the product repulpability can be proven. For printed paper products and stationery paper products, the applicant shall declare the non-use of wet strength agents.

Lamination, including polyethene and/or polypropylene, shall only be used to increase the durability of products with a life span of at least 1 year. such as: binders, folders, exercise books, calendars, notebooks and diaries. Lamination shall not be used in magazines, paper carrier bags, or wrapping paper. Double lamination shall not be used in any product.

3.3. The criterion on adhesives removability applies to all products. Unless otherwise specified, adhesives may be used only if their removability can be proven with a score of at least 71 on the <u>EPRC Adhesive</u> <u>Removal Scorecard</u>.

Pressure sensitive adhesive coatings shall be used only if their removability can be proven with at least a positive removability score according to the EPRC Adhesive Removal Scorecard.



The criterion does not apply to: (1) applies to adhesive labels if they constitute less than 0,50 % w/w of the final product (2) non-adhesive labels (3) water based adhesives.

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Please check: <u>Excel Tool for the Calculation of Removal Scores - Scorecard for the Removability of</u> <u>Adhesive Applications</u> developed by the European Paper Recycling Council.

3.4. The criterion on deinkability applies to printed paper products and envelopes based on white paper.

<u>Printed-paper products:</u> The deinkability shall be proven by demonstrating that all individual parameters analyzed have a positive score and the final score is at least 51 on the <u>EPRC Deinkability Scorecard</u>, or equivalent.

<u>Envelopes</u>: Deinkability test is not required but internal printing shall only be used for the privacy reasons and in envelopes composed of paper with a grammage of less than 135g/m2, or with opacity level lower than 98%. The internal printed surface shall be less than 80% of the total interior surface minus the glued area and shall be printed with light colour shades.



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In order to reflect the key terminology used by the adhesives industry the following definitions should be considered

- ✓ 'Adhesive application' refers to processed adhesives used in finished paper products (typically applied as films). The physicochemical properties responsible for the behaviour of the "adhesive applications" during the paper recycling process depend on the composition of the adhesive, the setting mechanism and the geometry (mainly thickness) of the application.
- ✓ 'Pressure-sensitive adhesive coatings' (PSA): means adhesives with still mobile molecules on their surfaces, even after setting, can produce sufficient adhesion by pressing their cohesive films (coating) against the surface to be bonded. Since they can be "activated" by pressure, they are also called "pressure-sensitive adhesives / PSA"(i.e. labels or tapes). PSAs can be formulated to feature a wide variety of physicochemical properties. Since, in paper recycling, the separation of non-paper components is mainly achieved by mechanical sorting, it is desirable for the PSA coatings to have a "minimum size", a sufficient thickness.

Required documentation for Assessment and verification

- Declaration from an applicant in Part C-D: Assessment and verification form (sheet declaration Criterion 3).
- For an external supplier: Annex I (Declaration 3.1, Declaration 3.3., Declaration 3.4., as applicable).

Supportive documentation to demonstrates proof of compliance with the criterion:

- For all products: A declaration of non-use of wet strength agents or the result(s) of test report(s) according to the PTS method PTS-RH 021, the ATICELCA 501 evaluation system or equivalent standard.
- A declaration of the non-use of lamination for newspapers, magazines, paper carrier bags, wrapping paper, or stationery paper products.
- For laminated products with a life span of at least 1 year a declaration of non-use of double lamination and the result(s) of test report(s) according to the PTS method PTS-RH 021 or ATICELCA 501 evaluation system or equivalent standard.
- For all products, unless otherwise specified, results of the adhesives removability test according to INGEDE Method 12 or equivalent. <u>Note:</u> for water-based adhesives a declaration of the water-based nature of the adhesive provided by the adhesive manufacturer or safety data sheet if it indicates that the adhesive is water -based.
- For printed paper products results of deinking test according to INGEDE Method 11, or equivalent standard methods.
- For envelopes with inner printing specifications of the weight/m² of the paper used according to UNE-EN ISO 536 or opacity according to ISO 2471, colour of printing ink, and % coverage of any internal printing pattern.

Products with *a life span of at least 1 year include:* binders, folders, exercise books, calendars, notebooks and diaries. *These products will* require extended durability due to their prolonged use. Lamination is possible under above mention condition. Double lamination is not permitted.



Please complete the calculations on the EPRC Adhesive Removal Scorecard and EPRC Deinkability Scorecard, to demonstrate the compliance with criterion 3.3 and 3.4. (Part C-D: Assessment and verification form – Criterion 3).

For the verification of deinkability requirement, testing of printing technologies or inks must be performed on the paper type(s) that is used in a product. The test certificate can be used for prints with the same ink on the same type of substrate if the ink coverage is equal or lower than on the tested product.

(i) **Note**. <u>The deinkability</u> according to INGEDE Method 11 depends on the combination of ink, paper type and printing technique used, and therefore <u>refers to the final printed product and not to an ink itself</u>. The deinkability test results from an ink manufacturer can only be accepted/requested if it considers the type of paper and printing techniques that is meant to be used by a printer in a combination with the specific ink. Otherwise, as the details of the printed product are unknown to the ink manufacturer, the deinkability test needs to be verified and declared by a printer.</u>

(i) <u>Note</u> The requirements of Criterion 3.2., and 3.4. can only be verified after finalising the product. To simplify the verification process <u>it is recommended to accept</u> the test results of sample product(s) that are similar to the description of the product that is being verified, i.e. results of deinkability test for the given combination of ink, paper, and printing technique.

Criterion 4 - Emissions

(i) Interpretation of criterion:

4.1. The specific amount of Cr and Cu emission to water from rotogravure printing at the point of discharge must not exceed, respectively, 20 mg per m2 and 200 mg per m2 of printing cylinder surface area used in the press.

4.2. The requirements apply to printing processes covered by Annex I and VII to Directive 2010/75/EU or to equivalent printing processes outside the EU that meet specifications of Annex I and VII to Directive 2010/75/EU.

Emissions of Cr(VI) to air from publication rotogravure printing shall not exceed 15,0 mg/tonne paper. Abatement equipment for reduction of emission to air shall be installed.

The solvent mass balance for the VOC emissions shall be performed on yearly basis (Please see: VOCs mass balance form). A written evaluation shall be done by a responsible staff member. Upon request, the evaluation shall be provided to the competent body.

For total or fugitive VOC emissions, as applicable, solvent mass balance shall be in line with the definition laid down in Part 7(2) of Annex VII to Directive 2010/75/EU and calculated based on the production during 12 months of operation. 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.

For the monitoring of total TVOC emissions to air in waste gases any stuck with an indicated TVOC load should be monitored as follows:



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-less than 10 kg C/h - at least once a year according to EN 12619, or equivalent.

-less than 0,1 kg C/h (as an annual average), or in the case of an unabated and stable TVOC load of less than 0,3 kg C/h - the monitoring frequency may be reduced to once every three years or the monitoring may be replaced by calculation provided that it ensures the provision of data of an equivalent scientific quality.

-higher or equal to 10 kg C/h should be monitored continuously according to EN 15267-1, EN 15267-2, EN 15267-3 and EN 14181. For continuous measurement, the data shall represent daily average over the period of one day based on valid hourly or half-hourly averages.

4.3. The requirements shall apply to printing processes not covered by Annex I or by Annex VII Part 2 to Directive 2010/75/EU or to equivalent printing processes outside the EU that do not meet specification of Annex I and VII to Directive 2010/75/EU.

Alternatively, where off- gas treatment is applied fugitive VOC emissions as calculated by the solvent mass balance should be lower or equal to 10% of the solvent input and TVOC emission in waste gases should be lower or equal to 20 mg C/Nm3.

Volatile solvents from the drying process of heat-set offset, rotogravure and flexography printing shall be managed by means of solvent recovery or thermal treatment or any equivalent system, i.e. substitution by the use of water based inks.

Printing process /Parameter	Unit	EU Ecolabel threshold	
C	Criterion 4.2	tineshotu	
Heatset web offset printing: SMB of Total VOC emi (As an alternative to the BAT-AEL as specified in p	-	point 2 can be used)	
Total VOC emissions as calculated by the solvent mass balance	Kg VOCs per kg of ink input	0,03	
Fugitive VOC emissions as calculated by the solvent	Percentage (%) of the solvent input	8	
mass balance TVOC	mg C/Nm3	12	
Publication rotogravure printing			
Fugitive VOC emissions as calculated by the solvent mass balance	Percentage (%) of the solvent input	<	
VOC	mg C/Nm3	<1	
Flexography and non - publication rotogravure prin (As an alternative to the BAT-AEL as specified in p	5	point 6 can be used)	
Total VOC emissions as calculated by the solvent mass balance	kg VOCs per kg of ink input	0,24	
Fugitive VOC emissions as calculated by the solvent mass balance	Percentage (%) of the solvent input	9,6	
TVOC	mg C/Nm3	16	
C	riterion 4.3.		
Sheet fed offset printing;	VOC/tonne of paper	4,5	
Digital printing	VOC/tonne of paper	1,0	
Heat set web offset printing	VOC/tonne of paper	2,0	
Cold set web offset printing	VOC/tonne of paper	2.5	
Other rotogravure, flexography, rotary screen printing, laminating or varnishing units.	VOC/tonne of paper	3,0	

To perform the calculation for the solvent mass balance please follow the instruction specified in User Manual Part C-D and VOCs mass balance calculator.

For total or fugitive VOC emissions, as applicable, solvent mass balance calculation shall be based on the production during 12 months of operation. The solvent mass balance shall be in line with the definition laid



down in Part 7(2) of Annex VII to Directive 2010/75/EU. 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.

For the monitoring of total TVOC emissions to air in waste gases, any stack with a TVOC load less than 10 kg C/h should be monitored at least once a year according to EN 12619, or equivalent. In the case of a TVOC load less than 0,1 kg C/h (as an annual average), or in the case of an unabated and stable TVOC load of less than 0,3 kg C/h, the monitoring frequency may be reduced to once every three years or the monitoring may be replaced by calculation provided that it ensures the provision of data of an equivalent scientific quality.

For any stack with a TVOC load higher or equal to 10 kg C/h the monitoring shall be continuous according to EN 15267-1, EN 15267-2, EN 15267-3 and EN 14181. For continuous measurement, the data shall represent daily average over the period of one day based on valid hourly or half-hourly averages.

Required documentation for Assessment and verification

- -Detailed calculations and results of test data showing the compliance with the criterion (VOCs mass balance calculator).
- Declaration from applicant in Part C-D: Assessment and verification form (sheet: declaration-criterion 4.1, criterion 4.2 and/or criterion 4.3).
- Supportive documentation to demonstrates proof of compliance with the criterion:
 - Results of the analytical test EN ISO 11885 for Cr and Cu content at the point of discharge (after treatment and immediately prior to discharge) divided by the cylinder surface used in the press during the printing.
 - A description of the abatement system in in place. For publication rotogravure printing, together with a documentation related to the control and the monitoring of Cr(VI) emissions and test results related to the reduction of Cr(VI) emissions to the air.
 - A declaration of the VOC content in, inks, washing agents, damping solutions or other corresponding chemical products.

The solvent mass balance shall be performed on yearly basis. A written evaluation shall be done by a responsible staff member. Upon request, the evaluation shall be provided to the competent body Completed emission calculations verify.



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Criterion 5 – Waste

(i) Interpretation of criterion:

5.1. The facility where the product is manufactured shall have a system in place for the handling of waste that addresses and documents the measures taken to reduce the amount of solid and liquid waste, including waste paper, ink waste, cleaning agent solution and dampening solution waste as defined by local or national regulatory authorities.

5.2. This criterion applies to printed paper products. The amount of waste paper 'X' produced shall not exceed the indicated values.

5.3. The criterion refers to stationery paper products and paper carrier bag products. The amount of waste paper 'X' produced shall not exceed the indicated values.

X = annual tonnes of waste paper produced during the printing/manufacturing of the eco-labelled stationery paper and paper carrier bag product (including finishing processes), divided by annual tonnes of paper purchased and used for the production of eco-labelled stationery paper and paper carrier bag product.

Printing method	X (%)
Sheet offset	23
Cold-set, newspaper	10
Cold-set, form printing	18
Cold-set rotation (except newspapers)	19
Heat-set rotation	21
Rotogravure printing	15
Flexography printing	17
Digital printing	10
Screen printing	23
Product	
Envelopes	19
Writing stationery products, excluding diaries	15
Diaries and filing stationery products printed on one side	20
Filing stationery products printed on both sides	30
Paper bags and wrapping paper	11

If the calculation of annual tonnes of waste paper produced during the manufacturing of the ecolabelled product is not technically feasible, the applicant may provide calculations regarding the total amount of paper for recycling produced annually in the plant.

A calculation of the amount of waste paper should include the amount of waste paper resulting from the outsourced work i.e. finishing processes.

Where the printing/conversion 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.



Required documentation for Assessment and verification

Declaration from an applicant in Part C-D: Assessment and verification form (sheet: declaration-Criterion 5).

Bupportive documentation to demonstrates proof of compliance with the criterion:

- A description of the procedures adopted for waste management for each site (where the waste management is outsourced, the sub- contractor shall provide a declaration of compliance as well).
- Documentation that demonstrates that a site is registered with EU Eco-Management and Audit Scheme (EMAS) and/or certified according to ISO 14001. **Note:** This shall be considered as having fulfilled criterion 5.1. if: (1) the inclusion of waste management is documented in the company's EMAS environmental statement or (2) the inclusion of waste management is sufficiently addressed by the ISO 14001 certification for the production site(s)).

Criterion 6 — Energy use

(i) Interpretation of criterion:

The site where the EU Ecolabel product is manufactured shall have established an energy management system addressing all energy consuming devices (including machinery, lighting, air conditioning, cooling). The energy management system shall include measures for the improvement of energy efficiency.

Required documentation for Assessment and verification

Declaration from an applicant in the UM Part C -D Assessment and Verification form (sheet: Declaration-Criterion 6).

Supportive documentation to demonstrates proof of compliance with the criterion:

- a description of the procedures adopted for energy management system;
- documentation that demonstrates that a site is certified according to ISO 50001, EN 16247, or
- registration with EU Eco-Management and Audit Scheme (EMAS) if the inclusion of energy management is documented in the EMAS environmental statement, or
- documentation that demonstrates that a site is certified according to ISO 14001 if the energy
 management is sufficiently addressed by the ISO 14001 certification for the production site.

Criterion 7 — Training

(i) Interpretation of criterion:

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



Required documentation for Assessment and verification

Declaration from an applicant in Part C-D: Assessment and verification form (sheet: declaration-Criterion 7).

Bupportive documentation that demonstrates compliance with the criterion:

- A description of the training programme, its content, and an indication of which staff have received what training and when.
- A sample of training material.

Criterion 8 — Fitness for use

(i) Interpretation of criterion:

The product shall be suitable for its purpose.

For those cases when the quality certification is not available, other verification systems should be considered.

Required documentation for Assessment and verification

Declaration from an applicant in Part C-D: Assessment and verification form (sheet: declaration-Criterion 8).

Supportive documentation that demonstrates compliance with the criterion – an applicant shall provide at least one of the following documents:

- Letter/document/statements issued by clients for a specific product, assuring that the product met their specifications and performs well in its intended application.
- Detailed description of procedure of handling consumer complaints.
- Documentation demonstrating the quality certification, in accordance with the standard ISO 9001, or equivalent.
- Documentation demonstrating the paper quality, in accordance with the standard EN ISO/IEC 17050-1, which provides general criteria for suppliers' declaration of conformity with standards.

Criterion 9 and 10 — Information on the product and Information appearing on the EU Ecolabel

The guidelines for the use of the optional label with text box can be found in the "Guidelines for use of the Ecolabel logo" at: http://ec.europa.eu/environment/ecolabel/documents/logo_guidelines.pdf



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(i) Interpretation of criterion:

The information indicated by Criterion 9 shall appear on the paper bag and printed paper product.

The applicant shall follow the instructions on how to properly use the EU Ecolabel logo provided in the EU Ecolabel Logo Guidelines:

If the optional label with text box is used, it shall contain the three statements mentioned in the criteria document. No other statements can be used in the box.

Required documentation for Assessment and verification

Declaration from an applicant in Part C-D: Assessment and verification form (sheet: declaration-Criterion 9 and 10).



Bupportive documentation that demonstrates compliance with the criterion.

an image of the product packaging bearing the information required and, where relevant, the statements that can be displayed together with the label.

/!\ An image should be provided to the competent body together with other enclosed documents. The image should be saved in one of the standardised graphic file formats such as. i.e. .jpg., .gif,. pmg.

If the logo is placed on the product (on cover, footer, etc) rather than on the packaging, the image of this logo should be provided as a supportive information that demonstrates the compliance with the requirement. Such a situation might occur in case of catalogues, magazines, etc.