EU Ecolabel for Absorbent Hygiene Products

User Manual

Version 1.0, July 2023

European Commission

EU Ecolabel for Absorbent Hygiene Products

Contents

Using this manual

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

Symbol description	
	Boxes with definitions or additional explanations of technical terms that could complement the definitions already included in Commission Decision (EU) 2023/1809[1].
	Notable or important information.
	Documentation on how to fill in the application form and information about documents to be submitted 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, details of the application process as well as frequently asked questions about the applications.

Part B: Product Assessment and Verification – outlines the criteria for the specific product group set out in the Commission Decision.

The manual is supplemented by the following elements as separate files:

- Application Form: a spreadsheet to be filled in
- Declarations: as editable pdf files to be filled in

The spreadsheet contains a first tab labelled "Read_me", which contains the information needed for the application form, data submission and declarations. Additionally, there are dedicated tabs for each criterion. The last tab in all spreadsheets is named "Data_summary" and it gathers anonymous information submitted in previous tabs of the Application Form.

The applicant may gather all the declarations from their suppliers and provide them to the assessing competent body together with the application form. Alternatively, these declarations can also be provided directly by the supplier to the competent body.

⚠ *Please read this manual all the way through before completing and submitting the verification form or any other documentation. EU Ecolabel competent bodies can help applicants/licence holders understand the EU Ecolabel criteria and can provide guidance on how to assemble an application dossier.*

All referenced legal acts are available at: https://eur-lex.europa.eu/homepage.html

[1] Commission Decision (EU) 2023/1809 of 14 September 2023 establishing the EU Ecolabel criteria for absorbent hygiene products and for reusable menstrual cups (OJ L 234, 22.9.2023, p. 142)

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 your national Competent Body.

1 Introduction

This User Manual is for guidance only and is designed to support the application phase for the EU Ecolabel for absorbent hygiene products. It includes an outline of all data, tests and documentation that are required to demonstrate compliance with the criteria.

The basis for the manual is the Commission Decision establishing the EU Ecolabel criteria for absorbent hygiene products. A copy of the criteria can be found at:

- http://ec.europa.eu/environment/ecolabel/products-groups-and-criteria.html

This document does not aim to duplicate the content of the criteria but is intended to support their interpretation, and is only focused on helpful explanations and clarifications. Each criterion name appears as a 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 the Commission Decision and this manual all the way through before completing and submitting the application form or any other documentation.*

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

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

2 Before you start

We recommend that before you start you take the following steps:

⚠ *Read the Commission Decision and its Annex carefully*[2].

⚠ *Contact your national EU Ecolabel competent body of your choice*[3].

⚠ *Make sure that 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.*

[2] Commission Decision (EU) 2023/1809 of 14 September 2023 establishing the EU Ecolabel criteria for absorbent hygiene products and for reusable menstrual cups (OJ L 234, 22.9.2023, p. 142)

[3] More information of your competent body is available at https://ec.europa.eu/environment/ecolabel/competent-bodies.html

3 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 into each Member State language and can be found at:

- https://environment.ec.europa.eu/publications/eu-ecolabel-translated-user-manuals-part_en

4 Part B: Product Assessment and Verification

4.1 Scope

The scope of the product group "absorbent hygiene products" (AHP) is reported in Article 1 of the Commission Decision and is as follows:

> *The product group 'absorbent hygiene products' comprises any article whose function is to absorb and retain human fluids such as urine, faeces, sweat, menstrual fluid or milk, excluding textile products. The product group 'absorbent hygiene products' includes products for both private and professional use.*

EU Ecolabel absorbent hygiene products include the following products:

a. baby diapers or baby nappies;
b. feminine sanitary protection (sanitary pads or towels, panty liners, tampons);
c. nursing pads (also known as breast pads);
d. absorbing sheets (for example for changing babies' diapers);
e. adult incontinence products.

> ⚠ *Adult incontinence products can be eligible for the EU Ecolabel only if such products are not registered as medical devices under the Medical Devices Regulation (EU) 2017/745[4]. The applicant is requested to state in the Application Form that the adult incontinence product has not been registered as medical device.*

The following products are excluded from the scope of the EU Ecolabel:

- Products falling under the scope of Regulation (EU) 2017/745 (the Medical Devices Regulation)
- Reusable products made of textiles

  > ⚠ *Hybrid products can contain a disposable absorbent section not made of textile. Such disposable section is eligible for the EU Ecolabel.*

- Wet wipes, cotton swabs and make up remover wipes (as their function is not to absorb and retain human fluids, but rather to clean parts of the human body).

[4] Regulation (EU) 2017/745 on medical devices (OJ L 117, 5.5.2017, p. 1).

4.2 Definitions for Absorbent Hygiene Products

The following definitions shall apply throughout this User Manual for AHP, and in reference to the original criteria document:

(1) 'additives' means substances added to components, materials or the final product in order to improve or preserve some of its characteristics;

(2) 'biobased plastic' means a plastic manufactured from biobased raw materials as feedstock for its production. While conventional plastics are made from fossil resources (oil and natural gas), biobased plastics are made from biomass. The biomass currently originates mainly from plants grown specifically to be used as feedstock to substitute fossil resources, such as sugarcane, cereal crops, oil crops or non-food sources like wood. Other sources are organic waste and by-products, such as used cooking oil, bagasse and tall oil. Plastics can be fully or partially made from biobased feedstock. Biobased plastics can be both biodegradable and non-biodegradable;

(3) 'cellulose pulp' means a fibrous material mainly composed of cellulose and obtained from the treatment of lignocellulosic materials with one or more aqueous solutions of pulping and/or bleaching chemicals;

(4) 'component' means one or several materials and chemical products that together fulfil a desirable function in the absorbent hygiene product, such as an absorbent core, adhesives, or an outer barrier film;

(5) 'composite packaging' means a unit of packaging made of two or more different materials, excluding materials used for labels, closures and sealing, which cannot be separated manually and therefore form a single integral unit;

(6) 'grouped packaging', also known as secondary packaging, means packaging conceived so as to constitute a grouping of a certain number of sales units at the point of sale whether the latter is sold as such to the end user or it serves only as a means to replenish the shelves at the point of sale or create a stock-keeping or distribution unit, and which can be removed from the product without affecting its characteristics;

> ⚠ *This means that after removing the grouped packaging, the product aspect and functionality are not altered*

(7) 'impurities' means residuals, pollutants, contaminants etc. from production, including the production of raw materials, that remain in the raw material/ingredient and/or in the chemical product (used in the final product and any component therein) in concentrations less than 100 ppm (0,0100 % w/w, 100 mg/kg);

> ⚠ *Examples of impurities are: residues or reagents including residues of monomers, catalysts, by-products and detergents for production equipment and carry-over from other or previous production lines*

> ⚠ *If the amount of a substance is more than 100 ppm in the chemical product, it shall be regarded as an ingoing substance, and not as an impurity.*

(8) 'ingoing substance' means all substances included in the chemical product (used in the final product and any component therein), including additives (e.g. preservatives and stabilisers) in the raw materials. Substances known to be released from ingoing substances in stabilized manufacturing conditions (e.g. formaldehyde and arylamine) are also considered as ingoing substances;

> ⚠ *Substances that are intentionally added in the raw materials and that are present in the chemical products in amounts less than 100 ppm shall be treated as ingoing substances, not as impurities*

(9) 'man-made cellulose fibres', also known as regenerated fibres, means fibres produced from the raw material cellulose which include viscose, modal, lyocell, cupro and triacetate;

(10) 'materials' mean the materials constituting different components of an absorbent hygiene product, such as fluff pulp, cotton or polypropylene (PP);

(11) 'packaging' means items of any materials that are intended to be used for the containment, protection, handling, delivery or presentation of products and that can be differentiated into packaging formats based on their function, material and design, including:

(a) items that are necessary to contain, support or preserve the product throughout its lifetime without being an integral part of the product which is intended to be used, consumed or disposed of together with the product;

(b) components of, and ancillary elements to, an item referred to in point (a) that are integrated into the item;

(c) ancillary elements to an item referred to in point (a) that are hung directly on, or attached to, the product and that perform a packaging function without being an integral part of the product which is intended to be used, consumed or disposed of together with the product; etc;

(12) 'plastic materials', also referred to as 'plastics', means polymers within the meaning of Article 3(5) of Regulation (EC) No 1907/2006 of the European Parliament and of the Council, to which additives or other substances may have been added, and which are capable of functioning as main structural components of final products and/or packaging, with the exception of natural polymers that have not been chemically modified;

(13) 'polymer' means a substance consisting of molecules characterised by the sequence of one or more types of monomer units. Such molecules must be distributed over a range of molecular weights wherein differences in the molecular weight are primarily attributable to differences in the number of monomer units. A polymer comprises the following: (a) a simple weight majority of molecules containing at least three monomer units which are covalently bound to at least one other monomer unit or other reactant; (b) less than a simple weight majority of molecules of the same molecular weight. In the context of this definition, a 'monomer unit' means the reacted form of a monomer substance in a polymer, as defined in Regulation (EC) No 1907/2006;

(14) 'product unit' means the smallest item that can be used by the consumer and that fulfils the product's function;

(15) 'recyclability' means the amount (mass or percentage) of an item available for recycling;

(16) 'recycled content' means the amount of an item (by area, length, volume or mass) that is sourced from post-consumer and/or post-industrial recycled material. Item can refer to the product or to the packaging in this case;

(17) 'recycling' means, in accordance with Article 3 of Directive 2008/98/EC of the European Parliament and of the Council , any recovery operation by which waste materials are reprocessed into products, materials or substances whether for the original or other purposes. It includes the reprocessing of organic material but does not include energy recovery and the reprocessing into materials that are to be used as fuels or for backfilling operations;

(18) 'sales packaging', also known as primary packaging, means packaging conceived so as to constitute a sales unit consisting of products and packaging to the final user or consumer at the point of sale;

(19) 'separate component', also known as additional component, means a packaging component that is distinct from the main body of the packaging unit, which may be of a different material, that needs to be disassembled completely and permanently from the main packaging unit in order to access the product, and that is typically discarded prior to and separately from the packaging unit. In the case of absorbent hygiene products, it is any component with protective or hygienic function that is removed before the use of the product, e.g. the individual wrapping or film where some absorbent hygiene products are contained within the sales packaging (mainly for tampons and sanitary pads), the release liner and paper in baby diapers and sanitary pads, or the applicator for tampons;

(20) 'substances identified to have endocrine disrupting properties', also referred to as endocrine disruptors, means substances which have been identified to have endocrine disrupting properties (human health and/or environment) according to Article 57(f) of Regulation (EC) No 1907/2006 (candidate list of substances of very high concern for authorisation), or Regulation (EU) No 528/2012 of the European Parliament and of the Council or Regulation (EC) No 1107/2009 of the European Parliament and of the Council , or Regulation (EC) No 1272/2008 of the European Parliament and of the Council ;

(21) 'super absorbent polymers' means synthetic polymers designed for absorbing and retaining large amounts of liquid compared to their own mass;

(22) 'synthetic polymers' means macromolecular substances other than cellulose pulp intentionally obtained either by:

(a) a polymerisation process such as poly-addition or poly-condensation or by any other similar process of combination of monomers and other starting substances;

(b) chemical modification of natural or synthetic macromolecules;

(c) microbial fermentation

(23) 'transport packaging', also known as tertiary packaging, means packaging conceived to facilitate handling and transport of a number of sales units or grouped packages, including e-commerce packaging but excluding road, rail, ship and air containers, in order to prevent physical handling and transport damage

4.3 Assessment and verification of the criteria

For the EU Ecolabel to be awarded to a specific product, the product shall comply with all requirements set in the Commission Decision (unless otherwise specified by the criterion legal text). The applicant shall provide a written confirmation stating that all the criteria are fulfilled.

Specific assessment and verification requirements are indicated within each criterion.

> 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 their supplier(s) 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.

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

As pre-requisite, the product shall meet all respective legal requirements of the country or countries in which the product is intended to be placed on the market. The applicant shall declare the product's compliance with this requirement.

The following information shall be provided together with the application for the EU Ecolabel:

(a) a description of the product, together with the weight of the individual product units and the total weight of the product;

⚠ *individual product unit is a unit of the total product, e.g. one nappy, one menstrual pad, one tampon, including the separate component (in case there is separate component).*

⚠ *total weight of the product: the total weight considering the whole number of units in a package (e.g. 20 x individual product unit), including the separate component (if relevant)*

(b) a description of the sales packaging (empty), together with its total weight, if applicable;

(c) a description of the grouped packaging (empty), together with its total weight, if applicable;

(d) a description of the separate components, together with their individual weight;

(e) the components, materials and all substances used in the product with their respective weights and, whenever applicable, their respective CAS numbers.

4.4 Criteria applicable to the Product Group

The third column in the following table specifies the minimum threshold for the presence of the cited material in the final product for the criterion to apply.

The list of EU Ecolabel criteria for AHP is presented below. Criteria 1 to 5 apply when the material represents ≥1% of the weight of the final product, with the exception of criterion 4 which applies when the material represents ≥5% of the weight of the final product.

No.	Criterion
1	Fluff Pulp
1.1	Sourcing of fluff pulp
1.2	Bleaching of fluff pulp
1.3	Emissions from fluff pulp production to water (COD and P) and to air (S and NOx)
1.4	Emissions of CO_2 from production of fluff pulp
2	Man-made cellulose fibres (including viscose, modal, lyocell, cupro, triacetate)
2.1	Sourcing of man-made cellulose fibres
2.2	Bleaching of man-made cellulose fibres
2.3	Production of man-made cellulose fibres
3	Cotton and other natural cellulosic seed fibres
3.1	Sourcing and traceability of cotton and other natural cellulosic seed fibres
3.2	Bleaching of cotton and other natural cellulosic seed fibres
4	Production of synthetic polymers and plastic materials
5	Biobased plastic materials
6	Material efficiency in the manufacturing of the final product
7	Excluded and restricted substances
7.1	Restrictions on substances classified under Regulation (EC) No 1272/2008 of the European Parliament and of the Council
7.2	Substances of Very High Concern (SVHCs)
7.3	Other specific restrictions
8	Packaging
9	Guidance on the use and on the disposal of the product and of the packaging
10	Fitness for use and quality of the product
11	Corporate Social Responsibility with regard to Labour Aspects
12	Information appearing on the EU Ecolabel

Criterion 1: Fluff pulp

Criterion 1 focuses on the sourcing and production of fluff pulp and must be fulfilled whenever the fluff pulp material (wet weight) represents more than 1% of the weight of the final absorbent hygiene product.

1.1 Sourcing of fluff pulp

All the companies supplying fluff pulp shall hold valid chain of custody certificates issued by an independent third party certification scheme. Accepted schemes are the Forestry Stewardship Council (FSC) and the Programme for the Endorsement of Forest Certification (PEFC). Equivalent schemes can also be accepted if deemed appropriate by the Competent Body in charge of the verification process.

A minimum of 70% of the wood raw materials used for the production of fluff pulp shall be covered by valid Sustainable Forestry Management (SFM) certificates issued by an independent third party certification scheme. Accepted schemes are FSC and PEFC. Equivalent schemes can also be accepted if deemed appropriate by the Competent Body in charge of the verification process.

The remaining proportion (<30%) of the wood raw material used for the production of fluff pulp that is not covered by SFM certificates shall be covered by a verification system which ensures that it is legally sourced and meets any other requirement of the certification scheme with respect to uncertified material.

⚠ *This includes, for example, "controlled wood" under the FSC or PEFC schemes*

The FSC scheme

The FSC certification can be at the forest management level and the supply chain level. In both cases, there are three possible control systems: the transfer system, the percentage system and the credit system. The transfer system is not relevant for absorbent hygiene products. Within the percentage system, companies have to monitor the inputs and outputs of certified fibres in their production line to be able to declare the % of certified fibres in the final product. Within the credit system, a proportion of fibres output in a product group is allowed to be sold with a credit claim corresponding to the quantity of claim-contributing inputs and the applicable conversion factor(s).

Both percentage system and credit system are allowed for the EU Ecolabel.

- More information can be found at: https://us.fsc.org/preview.fsc-coc-faq.a-446.pdf

⚠ *The certification bodies issuing the chain of custody and/or the SFM certificates shall be accredited/recognised by that certification scheme.*

Required documentation:

- Declaration of compliance with this sub-criterion from the applicant (template available separately).
- Declaration of compliance and valid, independently-certified chain of custody certificate(s) from all the supplier(s) of the pulp(s).
- Audited accounting documents demonstrating the percentage (≥70%) of the SFM-certified wood raw materials used for the production of the fluff pulp.

⚠ *The audited accounting documents shall be valid for the whole duration of the EU Ecolabel license.*

⚠ *Competent bodies will check the accounting documents again twelve months after the awarding of the EU Ecolabel license.*

Proof that the remaining proportion of wood raw materials is below 30 % and that it is controlled wood covered by a verification system that ensures that it is legally sourced and meets any other requirement of the certification scheme with respect to uncertified material.

⚠ *In case the certification scheme does not specifically require that all virgin material is sourced from non-GMO species, additional evidence shall be provided to demonstrate this.*

If the fluff pulp is used in air-laid, invoices should be provided supporting the number of credits allocated to the air-laid delivered to the product.

1.2 Bleaching of fluff pulp

The pulp used in the product shall not be bleached with the use of elemental chlorine (Cl_2) gas.

The following requirements apply only to elemental chlorine free (ECF) pulp. Totally chlorine free (TCF) pulp is automatically considered as complying with this sub-criterion.

The average annual adsorbable organically bound halogens (AOX) emissions from fluff pulp production shall not exceed 0.140 kg/ADt (air dried tonne, i.e. a tonne with 90% dry matter).

AOX

The parameter 'AOX' refers to the sum of all Adsorbable Organic Halogens in the wastewater. It is the measure of the total amount of halogens (chlorine, bromine and iodine) bound to dissolved or suspended organic matter in a wastewater sample. For pulp, paper and paperboard wastewaters, essentially all of the organic substances measured as AOX are chlorinated compounds that result from the bleaching of pulps with chlorine and chlorinated compounds such as chlorine dioxide and hypochlorite. AOX emissions form when chlorine compounds are added during bleaching. The vast majority of AOX emission comes from the first ClO_2 bleaching stage in the ECF process, while TCF bleaching is not relevant in terms of AOX emissions. AOX provides information about the quantity of chlorinated organic compounds in wastewater, and thus contains a broad mix of compounds that have different chemical properties. Minimizing AOX emissions will usually have the effect of also reducing the generation of chloroform, 2,3,7,8-TCDD, 2,3,7,8-TCDF, and chlorinated phenolic compounds .

The AOX emissions shall be measured using the ISO 9562:2004 test method and expressed in kg AOX/ADt.

⚠ *Other test methods may be accepted if considered equivalent by a third-party.*

Measurements of AOX emissions shall be taken on unfiltered and unsettled samples at the effluent discharge point of the mills' wastewater treatment plant. In cases where the mill effluent is sent to a municipal or other third-party wastewater treatment plant, unfiltered and unsettled samples from the mill effluent sewer discharge point shall be analysed and the results multiplied by a standard removal efficiency factor for the municipal or third-party wastewater treatment plant. The removal efficiency factor shall be based on information provided by the operator of the municipal or other third-party wastewater treatment plant.

AOX shall only be measured in processes where chlorine compounds are used for bleaching the pulp (ECF bleaching). AOX does not need to be measured in the effluent from pulp production without bleaching or where bleaching is performed with chlorine-free substances.

⚠ *In case different pulp grades are used, the AOX emissions should be measured for each pulp*

The annual AOX average shall be calculated from at least 12 measurements taken at least every month. Measurements shall be taken on a monthly basis from representative composite samples (24 hours composite).

⚠ *In case of a new or rebuilt production plant, measurements shall be based on at least 45 subsequent days of stable running of the plant.*

Required documentation:

For ECF-bleached pulp:

- Declaration of compliance with this sub-criterion from the supplier(s) (template available separately).
- A test report including the results of the measurement and any detailed calculation needed for showing compliance with this sub-criterion.
- Relevant supporting documentation related to the measurement of the AOX, indicating at least the measurement frequency.
- Declaration that elemental chlorine (Cl_2) gas was not used.

For TCF-bleached pulp:

- Declaration that ECF bleaching is not used for bleaching the fluff pulp.

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1.3 Emissions from fluff pulp production to water (chemical oxygen demand (COD) and phosphorous (P)), and to air (sulphur compounds (S) and NOx)

This sub-criterion restricts the emissions from fluff pulp to water and to air via a point system for each parameter: P_{COD} for chemical oxygen demand (COD), P_P for phosphorous (P), P_S for sulphur compounds (S) and P_{NOx} for nitrogen oxides (NOx).

Points are calculated dividing the measurement value of the parameter by its reference value as reported in Table 1 of Annex I to the Commission Decision (also reported below for simplicity)

For each pulp 'i' supplied, the related measured emissions (expressed in kg/ADt) shall be weighted according to the proportion of the pulp 'i' used in the fluff pulp and then summed together. This factor shall then be divided by the total reference value as shown in the following formula for the example of P_{COD}:

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

⚠ *None of the individual points P_{COD}, P_P, P_S, P_{NOx}, shall exceed 1.5.*

⚠ *The sum of points ($P_{total} = P_{COD} + P_P + P_S + P_{NOx}$) shall not exceed 4.0.*

Table 1: Reference values for emissions from different pulp types

Pulp grade	Reference values (kg/ADt)			
	COD_{ref}	P_{ref}	S_{ref}	NOx_{ref}
Integrated mills				
Bleached chemical pulp (other than sulphite)	16.0	0.030 (1) 0.05 (2)	0.6	1.5
Bleached chemical pulp (sulphite)	24.0	0.03	0.6	1.5
Unbleached chemical pulp	6.5	0.02	0.6	1.5
Unbleached chemical pulp (UKP-E quality only)	6.5	0.035	0.6	1.5
CTMP ('chemithermomechanical pulp')	15.0	0.01	0.2	0.3
NSSC ('neutral sulphite semi-chemical pulp')	11	0.02	0.4	1.5
Non-integrated mills (3)				
Converting process	1	0.001	0.15	0.6

(1) Net emissions of P are considered in the calculation. The P naturally contained in wood raw materials and in water can be subtracted from the total emissions of P. Reductions up to 0,010 kg/ADt shall be accepted.

(2) The higher value refers to mills using eucalyptus and loblolly southern U.S. pine species from regions with higher levels of phosphorous and applies only until 31 December 2026. From 1 January 2027, the limit is 0,03 kg P/ADt.

(3) The raw material pulp(s) for non-integrated mills shall comply with the values listed for integrated mills, to which the emissions resulting from the conversion process should be added.

Loblolly southern U.S. pine species

Loblolly southern U.S. pine species typically used are: slash pine (Pinus elliottii Engelm.), longleaf pine (Pinus palustris Mill.), shortleaf pine (Pinus echinate Mill.), pond pine (Pinus serotine), Virginia pine (Pinus virginiana), sand pine (Pinus clausa), spruce pine (Pinus glabra), and white pine (Pinus strobes)

Non-integrated processes

In a non-integrated process, the mill buys market pulps as raw materials from one or more supplier(s). The market pulp(s) are then dissolved, mixed (in case more pulps are used), and dried to obtain the fluff pulp rolls that are transported to the AHP production site, where the fluff pulp is defibrated (or 'fluffed').

The configuration of this process implies that emissions occur twice: one time when the market pulp is produced (i.e. from the wood raw material to the market pulp), and a second time when the fluff pulp is produced (i.e. the conversion process, from the market pulp to the fluff pulp).

The reference values for the emissions of COD, P, S compounds and NOx in Table 1 apply to the conversion process only (from market pulp to fluff pulp). Market pulps have to comply with the reference values in place for integrated mills.

Measurement results shall be representative of the respective campaign and a sufficient number of measurements shall have been taken place for each emission parameter.

Data shall be reported as annual averages except in cases where:

- the production campaign is for a limited time period only,
- the production plant is new or has been rebuilt, in which case the measurements shall be based on at least 45 subsequent days of stable running of the plant.

Measurements of emissions to water (COD and P) shall be taken on unfiltered and unsettled samples at the effluent discharge point of the mills' wastewater treatment plant. In cases where the mill effluent is sent to a municipal or other third-party wastewater treatment plant, unfiltered and unsettled samples from the mill effluent sewer discharge point shall be analysed and the results multiplied by a standard removal efficiency factor for the municipal or third-party wastewater treatment plant. The removal efficiency factor shall be based on information provided by the operator of the municipal or other third- party wastewater treatment plant.

⚠ *The minimum measurement frequency for COD measurements and for total P emissions shall be weekly.*

Emissions to air (S and NOx) shall include all emissions that occur during the production of pulp, including steam generated outside the production site, minus any emissions allocated to the production of electricity. In cases where co-generation of heat and electricity occur at the same plant, the emissions of S compounds and NOx resulting from on-site electricity generation shall be subtracted from the total amount. The following equation shall be used to calculate the proportion of the emissions resulting from electricity generation:

$$2 \times (\text{MWh(electricity)})/[2 \times \text{MWh(electricity)} + \text{MWh(heat)}]$$

Where:

- MWh(electricity) is the electricity produced at the co-generation plant.
- MWh(heat) is the net heat delivered from the co-generation plant to the pulp production.

⚠ *Emissions of S and NOx shall be measured at least twice per calendar year (separated by four to six months)*

Measured emission values for S compounds shall include both oxidised and reduced S emissions (SO_2 and TRS – measured as S). The S emissions related to the heat energy generation from oil, coal and other external fuels with known S content may be calculated instead of being measured, and shall be taken into account.

Measurements of S compounds and NOx shall include recovery boilers, lime kilns, steam boilers and destructor furnaces for strong smelling gases. Diffuse emissions shall also be taken into account.

⚠ *The following diffuse sources should at least be considered:*

For concentrated non-condensable gases (CNCG): Batch cook blowing, batch cook gassing, continuous cooking, stripper, evaporation plant, methanol processing, black liquor heat treatment, super concentrator;

For dilute non-condensable gases (DNCG): Vent gases from continuous cooking, vent gases from superbatch cooking (evacuation air, vents from non-pressurised tanks), pulp washing plant vent gases, tall oil cooking plant vent gases, tank vent gases, evaporation plant (atmospheric pressure tanks), causticising plant lime kiln area.

⚠ *The following streams should <u>not</u> be considered: ventilation air from buildings, moist water vapour from pulp or paper machines, moist air from cooling towers, water vapour from the surface of effluent treatment ponds, ventilation from drains, and vapour from vacuum pump.*

The following continuous or periodical monitoring standard test methods are accepted:

- COD: ISO 15705 or ISO 6060;
- Total P: EN ISO 6878;
- S (sulphur oxides): EN 14791, EPA no 8 or EPA Method 6c;
- S (reduced sulphur): EPA no 15A, 16A, 16B or 16c;
- S content in oil: ISO 8754;
- S content in coal: ISO 19579
- S content in biomass: EN 15289
- NOx: EN 14792, ISO 11564, or EPA Method 7e.

⚠ *Test methods whose scope and requirement standards are considered equivalent to the ones mentioned above and whose equivalency has been confirmed by an independent third-party shall be accepted.*

⚠ *Rapid tests can also be used to monitor emissions as long as they are performed regularly (e.g. monthly) against the relevant aforementioned standards or suitable equivalents.*

⚠ *For COD measurements (expressed in mg/l), continuous monitoring based on analysis of total organic carbon (TOC) shall be accepted as long as a correlation between TOC and COD results has been established for the industrial site concerned*

Required documentation:

- Declaration(s) of compliance with this criterion from the supplier(s) (template available separately).
- Detailed calculations and test data showing compliance with this sub-criterion.
- Supporting documentation, including test reports. Test reports must indicate the measurement frequency and the calculation of the P_{COD}, P_P, P_S and P_{NOx}.

1.4 Emissions of CO_2 from fluff pulp production

CO_2 emissions from the production of fluff pulp shall not exceed the values presented in Table 2 of Annex I to Commission Decision (EU) 2023/1809 (also reported below).

The emissions shall be expressed as kg CO_2 per air-dried tonne of fluff pulp. The CO_2 emission value shall be calculated for each fluff pulp used in the AHP.

The calculation of CO_2 emissions shall include all sources of energy used during the production of fluff pulp, and shall include also the emissions from the production of electricity (whether on-site or off-site).

Table 2 Limit values for different types of pulp

Pulp grade	CO_2 emissions
Integrated mills	
Chemical and semi-chemical pulp	400 kg CO_2/ADt
CTMP ('chemithermomechanical pulp')	900 kg CO_2/ADt
Non-integrated mills ([1])	
Converting process	95 kg CO_2/ADt
([1]) The raw material pulp(s) for non-integrated mills shall comply with the values listed for integrated mills. See also relevant box in sub-criterion 1.3	

For the calculation of CO_2 emission from fuels and electricity, the reference emission values according to Table 3 of Annex I to Commission Decision (EU) 2023/1809 (also reported below) shall be used.

⚠ *If needed, CO_2 emission factors for energy sources other than those listed in* Table *3 can be found in Annex VI to Regulation (EU) 2018/2066*

⚠ *For the grid electricity, it is possible to use a specific value for the electricity used instead of the one reported in* Table *3, but appropriate documentation shall be provided (e.g. copy of a contract)*

Table 3: Reference values for CO_2 emissions from different energy sources

Fuel	CO_2 emissions	Unit
Coal	94.6	g CO_2 fossil/MJ
Crude oil	73.3	g CO_2 fossil/MJ
Fuel oil 1	74.1	g CO_2 fossil/MJ
Fuel oil 2-5	77.4	g CO_2 fossil/MJ
LPG	63.1	g CO_2 fossil/MJ
Natural Gas	56.1	g CO_2 fossil/MJ
Grid Electricity	376	g CO_2 fossil/kWh

Renewable energy

'Energy from renewable sources', or 'renewable energy', is defined as in Directive (EU) 2018/2001 on the promotion of the use of energy from renewable sources as: "energy from renewable non-fossil sources, namely wind, solar (solar thermal and solar photovoltaic) and geothermal energy, ambient energy, tide, wave and other ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas, and biogas".

Energy from renewable sources count as zero CO_2 emissions for all the above except for biomass energy.

For biomass energy to be counted as zero CO_2 emissions, the biomass needs to fulfil the relevant sustainability and greenhouse gas savings criteria as specified in Article 29 of Directive (EU) 2018/2001.

The measurement period shall be of 12 months of production. The measurement shall be representative of the respective campaign.

For a new or re-built plant or a change of process at the production plant, measurements shall be done on a weekly basis for a total of 8 consecutive weeks following steady running of the plant.

⚠ *Results have to be shown also after 12 months of production.*

Required documentation:

- Declaration of compliance with the sub-criterion (template available separately)
- Data and detailed calculations on the CO_2 emissions showing compliance with this requirement, together with related supporting documentation. An excel tab is available in the electronic Application Form.
- If renewable energy is used, documentation shall be provided that renewable energy is actually used at the mill or that it has been externally purchased (e.g. copy of an energy contract).
- If a different reference value for electricity used instead of the one reported in Table 3, documentation shall be provided that include technical specifications that indicate the average value for the electricity used (e.g. copy of a contract).

1.5 Energy consumption for fluff pulp production

This sub-criterion restricts the energy consumption during fluff pulp production via a point system for electricity and fuel consumption: $P_{electricity}$ for electricity and P_{fuel} for fuel.

Points are calculated dividing the energy use by its reference value as reported in Table 4 of Annex I to Commission Decision (EU) 2023/1809 (also reported below for simplicity).

The energy input during the production of the pulp shall be divided into heat/fuels and electricity.

If a mix of pulps is used, the energy must be calculated using values for single pulps and their proportions in the pulp mix. For each pulp 'i' supplied and used in the AHP, the energy use (expressed in kWh/ADt) shall be weighted according to the proportion of the pulp 'i' in the fluff pulp and summed together. This factor shall then be divided by the total reference value as shown in the following formulas for $P_{electricity}$ and P_{fuel}.

⚠ *The energy used in the transportation of the raw materials should not be accounted for.*

Calculation of electricity consumption points:

$$P_{electricity} = \frac{\sum_{i=1}^{n}[pulp_i \times E_{pulp,i}]}{\sum_{i=1}^{n}[pulp_i \times E_{ref,pulp,i}]}$$

Where:

$E_{pulp,i}$ = internally produced electricity + purchased electricity – sold electricity;

$E_{ref,pulp,i}$ as in Table 4 of Annex I to the Commission Decision

Total electricity consumption E_{pulp} includes the net imported electricity coming from the grid and the internal generation of electricity, measured as electric power.

⚠ *Electricity used for wastewater treatment shall not be included.*

Calculation of fuel consumption points:

$$P_{fuel} = \frac{\sum_{i=1}^{n}[pulp_i \times F_{pulp,i}]}{\sum_{i=1}^{n}[pulp_i \times F_{ref,pulp,i}]}$$

Where:

$F_{pulp,i}$ = internally produced fuel + purchased fuel – sold fuel – 1,25 × internally produced electricity

$F_{ref,pulp,i}$ as in Table 4 of Annex I to the Commission Decision

Total fuel consumption F_{pulp} includes all purchased fuels, the heat energy recovered by incinerating liquors and waste from on-site processes (e.g. wood waste, sawdust, liquors, etc.), as well as the heat recovered from the internal generation of electricity. However, when calculating the total heat energy, the applicant only needs to count 80 % of the heat energy from internally generated sources.

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

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

⚠ *None of the individual points $P_{electricity}$, P_{fuel} shall exceed 1.5*

⚠ *The sum of points ($P_{total} = P_{electricity} + P_{fuel}$) shall not exceed 2.5*

Table 4: Reference values for electricity and fuel from different pulp types

Pulp grade	Reference values (kWh/ADt)	
	$E_{ref,pulp}$	$F_{ref,pulp}$
Integrated mills		
Chemical and semi-chemical pulp	800	5400
CTMP ('chemithermomechanical pulp')	1800	900
Non-integrated mills ([1])		
Converting process	250	1800
([1]) The raw material pulp(s) for non-integrated mills shall comply with the values listed for integrated mills. See also relevant box in sub-criterion 1.3		

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

⚠ *Energy used in the transportation of the raw materials is not included in the energy consumption calculations.*

Required documentation:

- Declaration of compliance with the sub-criterion (template available separately)
- Data and detailed calculations on the electricity and fuel consumption showing compliance with this requirement, together with related supporting documentation. An excel tab is available in the electronic Application Form.

Criterion 2: Man-made cellulose fibres (MMCF)

Criterion 2 focuses on the sourcing and production of man-made cellulose fibres and must be fulfilled whenever the man-made cellulose fibres in the product (wet weight) represents more than 1% of the weight of the final absorbent hygiene product.

ⓘ Additional information

Man-made cellulose fibres are obtained from the production of dissolving pulp which uses raw materials such as wood, bamboo or cotton. Sub-criterion 2.1 applies to all dissolving pulps except dissolving pulp made from cotton linters. Sub-criteria 2.2 and 2.3 apply to all dissolving pulps.

⚠ *The suppliers of man-made cellulose fibres can provide the information to show compliance with this criterion directly to the Competent Body.*

2.1 Sourcing of man-made cellulose fibres

All the companies supplying dissolving pulp shall hold valid chain of custody certificates issued by an independent third party certification scheme. Accepted schemes are the Forestry Stewardship Council (FSC) and the Programme for the Endorsement of Forest Certification (PEFC). Equivalent schemes can also be accepted if deemed appropriate by the Competent Body in charge of the verification process.

A minimum of 70% of the raw materials used for the production of the dissolving pulp shall be covered by valid Sustainable Forestry Management (SFM) certificates issued by an independent third party certification scheme. Accepted schemes are FSC and PEFC. Equivalent schemes can also be accepted if deemed appropriate by the Competent Body in charge of the verification process.

The remaining proportion (<30%) of the raw material used for the production of dissolving pulp that is not covered by SFM certificates shall be covered by a verification system which ensures that it is legally sourced and meets any other requirement of the certification scheme with respect to uncertified material.

⚠ *The certification bodies issuing the chain of custody and/or the SFM certificates shall be accredited/recognised by that certification scheme.*

⚠ *Dissolving pulp produced from cotton linters shall meet criterion 3.1 for cotton (sourcing and traceability).*

Required documentation:

- Declaration of compliance of MMCF except cotton linters (template available).
- Declaration of compliance of MMCF from cotton linters (template available).
- Valid, independently-certified chain of custody certificate from the supplier(s) of the dissolving pulp(s).

Audited accounting documents demonstrating the percentage (≥70%) of the SFM-certified raw materials used for the production of the dissolving pulp(s).

⚠ *The audited accounting documents shall be valid for the whole duration of the EU Ecolabel license.*

⚠ *Competent bodies will check the accounting documents again twelve months after the awarding of the EU Ecolabel license.*

Proof that the remaining proportion of raw materials is below 30% and that it is controlled material covered by a verification system that ensures that it is legally sourced and meets any other requirement of the certification scheme with respect to uncertified material.

⚠ *In case the certification scheme does not specifically require that all virgin material is sourced from non-GMO species, additional evidence shall be provided to demonstrate this.*

If the dissolving pulp is used in air-laid, invoices should be provided supporting the number of credits allocated to the air-laid delivered to the product.

2.2 Bleaching of man-made cellulose fibres

This sub-criterion applies only to elemental chlorine free (ECF) pulp. Totally chlorine free (TCF) pulp is automatically considered as complying with this sub-criterion.

The dissolving pulp used to manufacture man-made cellulose fibres added in the product shall not be bleached with the use of elemental chlorine (Cl_2) gas.

The resulting total amount of AOX and organically bound chlorine (OCl) shall not exceed the following:

- 0,140 kg/ADt, measured in the wastewater from dissolving pulp manufacturing (AOX); and
- 150 ppm, measured in the finished man-made cellulose fibres (OCl).

AOX

The parameter 'AOX' refers to the sum of all Adsorbable Organic Halogens in the wastewater. It is the measure of the total amount of halogens (chlorine, bromine and iodine) bound to dissolved or suspended organic matter in a wastewater sample. For pulp, paper and paperboard wastewaters, essentially all of the organic substances measured as AOX are chlorinated compounds that result from the bleaching of pulps with chlorine and chlorinated compounds such as chlorine dioxide and hypochlorite. AOX emissions form when chlorine compounds are added during bleaching. The vast majority of AOX emission comes from the first ClO_2 bleaching stage in the ECF process, while TCF bleaching is not relevant in terms of AOX emissions. AOX provides information about the quantity of chlorinated organic compounds in wastewater, and thus contains a broad mix of compounds that have different chemical properties. Minimizing AOX emissions will usually have the effect of also reducing the generation of chloroform, 2,3,7,8-TCDD, 2,3,7,8-TCDF, and chlorinated phenolic compounds.

OCl

The parameter OCl refers to 'Organically bound Chlorine' as a measure of chlorine compounds in a material or product. OCl can be decreased by improving delignification during pulping, with a proper washing of the pulp before bleaching, using substitutes for chlorine or avoiding over chlorination (by efficient mixing of chlorine added to pulp or using several smaller additions of chlorine to avoid localized high chlorine concentrations).

The AOX emissions shall be measured using the ISO 9562:2004 or the equivalent EPA 1650C and expressed in kg AOX/ADt.

⚠ *Frequency of measurement for AOX shall be set in accordance with the criterion 1.2 for fluff pulp: measurements of AOX emissions shall be taken on unfiltered and unsettled samples at the effluent discharge point of the mills' wastewater treatment plant. In cases where the mill effluent is sent to a municipal or other third-party wastewater treatment plant, unfiltered and unsettled samples from the mill effluent sewer discharge point shall be analysed and the results multiplied by a standard removal efficiency factor for the municipal or third-party wastewater treatment plant. The removal efficiency factor shall be based on information provided by the operator of the municipal or other third-party wastewater treatment plant.*

AOX shall only be measured in processes where chlorine compounds are used for bleaching the pulp (ECF bleaching). AOX does not need to be measured in the effluent from pulp production without bleaching or where bleaching is performed with chlorine-free substances.

⚠ *In case different pulp grades are used, the AOX emissions should be measured for each pulp*

The annual AOX average shall be calculated from at least 12 measurements taken at least every month. Measurements shall be taken on a monthly basis from representative composite samples (24 hours composite).

⚠ *In case of a new or rebuilt production plant, measurements shall be based on at least 45 subsequent days of stable running of the plant.*

⚠ *In case the applicant could not provide the actual value of AOX level measured in the wastewater from pulp manufacturing, a corresponding declaration of compliance signed by the pulp manufacturer, in accordance with the exposed requirement, shall be provided.*

The OCl level shall be measured using the ISO 11480 test method and expressed in ppm.

⚠ *The OCl level shall be measured in the finished MMCF.*

Required documentation:

For ECF-bleached dissolving pulp:

- Declaration of compliance with the sub-criterion (template available).
- A test report including the results of the measurement of AOX and OCl and any detailed calculation needed for showing compliance with this sub-criterion.
- Relevant supporting documentation related to the measurement of the AOX, indicating at least the measurement frequency.
- Declaration of compliance signed by the pulp manufacturer, in accordance with the exposed AOX requirement, shall be provided (only if applicable).
- Relevant supporting documentation related to the measurement of the OCl.
- Declaration that elemental chlorine (Cl_2) gas was not used.

For TCF-bleached pulp:

- Declaration that ECF bleaching is not used for bleaching the dissolving pulp.

2.3 Production of man-made cellulose fibres

This sub-criterion establishes:

- circular economy measures for the MMCF production process; and
- restricts the emissions from the manufacturing of MMCF of sulphur to air and of zinc, COD and SO_4^{2-} to water.

(a) More than 50 % of dissolving pulp used to manufacture man-made cellulose fibres shall be obtained from dissolving pulp mills that recover value from their spent process liquor either by:

(i) generating on-site electricity and/or steam, or

(ii) manufacturing chemical co-products.

(b) The following limit values for the emission of several compounds to air and water shall be respected in the viscose and in the modal fibres production process:

Table 5 Viscose and modal fibres emission values

Fibre type	Sulphur emissions to air — Limit value (g/kg)	Zinc emissions to water — Limit value (g/kg)	COD measurements in water — Limit value (g/kg)	SO_4^{2-} emissions to water — Limit value (g/kg)
Staple fibre	20	0,05	5	300
Filament fibre				
- Batch washing	40	0,10	5	200
- Integrated washing	170	0,50	6	250

⚠ *Note: Limit values are expressed as annual average.*

⚠ *All values are expressed as g of pollutant/kg of product.*

The following continuous or periodical monitoring standard test methods are accepted:

- Sulphur: EN 14791, EPA no. 8, 15A, 16A or 16B or DIN 38405-D27.
- Zinc: EN ISO 11885.
- COD: ISO 6060, DIN ISO 15705, DIN 38409-01 or DIN 38409-44.
- SO_4^{2-} (sulphates): ISO 22743.

⚠ *Test methods whose scope and requirement standards are considered equivalent to the one of the named national and international standards and whose equivalency has been confirmed by an independent third-party shall be accepted.*

⚠ *The detailed documentation and test reports shall include an indication of the measurement frequency for S, Zn, COD and SO_4^{2-}.*

⚠ *The minimum measurement frequency, shall be weekly for COD, S, Zn and SO_4^{2-}, in addition to any measurements stipulated in the regulatory requirements.*

Required documentation:

- Declaration of compliance with this sub-criterion (template).
- Supporting documentation and evidence that the required proportion of dissolving pulp suppliers has the appropriate energy generating equipment or co-product recovery and manufacturing systems installed at the related production sites.
- List of dissolving pulp suppliers.
- Detailed calculations, test reports and supporting documentation showing compliance with emission restrictions in this sub-criterion.

Criterion 3: Cotton and other natural cellulosic seed fibres

Criterion 3 focuses on the sourcing and production of cotton and other natural cellulosic seed fibres and must be fulfilled when the cotton or other natural cellulosic fibres (wet weight) represents more than 1% of the weight of the final absorbent hygiene product.

3.1 Sourcing and traceability of cotton and other natural cellulosic seed fibres

All cotton and other natural cellulosic seed fibres shall be grown according to the requirements laid down in Council Regulation (EC) No 834/2007[5], the US National Organic Programme (NOP)[6] or equivalent legal obligations set by trade partners of the European Union.

The sourcing of the cotton and other natural cellulosic seed fibres shall be certified by an independent control body

⚠ *Organically grown cotton and transitional organic cotton are both considered as organic cotton.*

⚠ *Global Organic Textile Standard (GOTS)[7] certifications are accepted as long as 100% of the fibres are organic*

Cotton and other natural cellulosic seed fibres grown according to the above requirement and used to manufacture the absorbent hygiene product shall be traceable from the point of verification of the production standard.

⚠ *Tampon strings are exempted from the traceability requirement*

Required documentation:

- Declaration of compliance with the sub-criterion from the applicant (template available separately)
- Declaration of compliance with the sub-criterion from the supplier(s) (template available separately)
- Certification of the sourcing of cotton/other natural cellulosic seed fibres for each country of origin of the material.

⚠ *Verification shall be provided on an annual basis, i.e. every 12 months. The applicant shall demonstrate that all the cotton used in the previous 12 months is compliant with sub-criterion 3.1*

- Information and documentation (e.g. transaction records or invoices) on the total amount of cotton/other natural cellulosic seed fibres purchased to manufacture the final product and according to each product line, on an annual basis. The total weight of certified bales shall also be provided.

[5] Council Regulation (EC) No 834/2007of 28 June 2007 on organic production and labelling of organic products and repealing Regulation (EEC) No 2092/91 (OJ L 189, 20.7.2007, p. 1).
[6] http://www.ams.usda.gov/AMSv1.0/nop
[7] https://global-standard.org/images/resource-library/documents/standard-and-manual/GOTS_7.0__SIGNED_.pdf

3.2 Bleaching of cotton and other natural cellulosic seed fibres

Cotton and other natural cellulosic seed fibres shall be bleached only using total chlorine free (TCF) technologies.

This requirement does not apply to cotton liners used to produce dissolving pulp.

Required documentation:

Declaration from the supplier of cotton (template available separately).

Criterion 4: Production of synthetic polymers and plastic materials

This criterion applies to each synthetic polymer and plastic material that represents **≥ 5% w/w** of the final product and/or of the packaging.

Criterion 4 focuses on systems for water-saving, waste management and energy management and optimisation that polymers and plastic materials production sites shall have in place.

⚠ *Synthetic polymers and plastic materials shall also comply with the restrictions on ingoing chemical substances reported in criterion 7.*

Manufacturing facilities producing synthetic polymers and plastic materials used in the final product shall have systems for the implementation of:

(a) water-savings. The water management system shall be documented or explained and shall include information on at least the following aspects: monitoring of water flows; proof of circulating water in closed systems; and continuous improvement objectives and targets relating to the reduction of wastewater generation and optimisation rates (if relevant, i.e. if water is used in the plant);

(b) integrated waste management, in form of a plan to prioritise treatment options other than disposal for all the waste generated at the manufacturing facilities and to follow the waste hierarchy in relation to prevention, reuse, recycling, recovery and final disposal of waste. The waste management plan shall be documented or explained and shall include information on at least the following aspects: separation of different waste fractions; handling, collection, separation and use of recyclable materials from the non-hazardous waste stream; recovery of materials for other uses; handling, collection, separation and disposal of hazardous waste, as defined by the relevant local and national regulatory authorities; and continuous improvement objectives and targets relating to waste prevention, reuse, recycling and, recovery of waste fractions that cannot be prevented (including energy recovery);

(c) optimisation of energy efficiency and energy management. The energy management system shall address all energy consuming devices, including machinery, lighting, air conditioning and cooling. The energy management system shall include measures for the improvement of energy efficiency and shall include information on at least the following aspects: establishing and implementing an energy data collection plan in order to identify key energy figures; analysis of energy consumption that includes a list of energy consuming systems, processes and facilities; identification of measures for more efficient use of energy; continuous improvement objectives and targets relating to the reduction of energy consumption.

⚠ *Applicants registered with EU Eco-Management and Audit Scheme (EMAS) and/or certified according to ISO 14001, ISO 50001, EN 16247 or an equivalent standard/scheme shall be considered as having fulfilled these requirements if:*

⚠ *(a) the inclusion of water, waste and energy management plans for the production site(s) is documented in the company's EMAS environmental statement; or*

⚠ *(b) the inclusion of water, waste and energy management plans for the production site(s) is sufficiently addressed by the ISO 14001, ISO 50001, EN 16247 or an equivalent standard/scheme*

Required documentation:

- Declaration of compliance with the criterion from the suppliers of synthetic polymers and plastic materials used in the final product and/or the packaging (template available).
- Report describing in detail the procedures adopted by the suppliers in order to fulfil the requirements for each of the sites concerned in accordance with standards, such as ISO 14001 and/ or ISO 50001 for water, waste and energy plans.
- If waste management is outsourced, the sub-contractor shall provide a declaration of compliance with this criterion as well.

Criterion 5: Biobased plastic materials

This criterion applies only to the final product, separate components, and/or packaging that contain > 1% w/w of biobased plastic material.

Criterion 5 concerns the use of synthetic polymers based on renewable materials i.e. from available biological resources ready to be acquired and which would avoid the dependency on fossil resources.

⚠ *Biobased plastic materials shall also have systems for water-saving, waste management and energy management and optimisation as reported in criterion 4.*

⚠ *Biobased plastic materials shall also comply with the restrictions on ingoing chemical substances reported in criterion 7.*

⚠ *This criterion applies on a voluntary basis*

⚠ *This criterion is aligned with the Communication from the European Commission on EU Policy Framework on biobased, biodegradable and compostable plastics, available here*

A certain percentage of the total synthetic polymers and plastic materials in relation to the total weight of polymers in the final product (including super absorbent polymers (SAP)), the separate components and/or in the packaging, may be sourced – on a voluntary basis - from biobased raw materials. Circular economy principles shall guide the selection of feedstocks (as an example, producers shall prioritise the use of organic waste and by-products as feedstock). In this case, two requirements to fulfil:

(a) The superior environmental profile of the biobased raw materials used to produce biobased plastics in the final product, separate components, and/or packaging shall be demonstrated in compliance with the latest applicable methodologies to assess the impacts of biobased plastics compared to fossil-based plastics

⚠ *Latest methodologies are the framework developed by the Commission's Joint Research Centre, referred to as the 'Plastics LCA method' or Commission Recommendation of 8.12.2022 establishing a European assessment framework for 'safe and sustainable by design' chemicals and materials*

(b) Biobased raw materials used to produce biobased plastics in the final product, separate components, and/or packaging shall be covered by chain of custody certificates issued by an independent third-party certification scheme officially recognised by the European Commission

⚠ *In line with the sustainability requirements related to the sourcing of biobased raw material as per the review of the Renewable Energy Directive (RED III). The certification schemes officially recognised by the European Commission are available here*

Required documentation:

- Declaration of compliance to demonstrate the superior environmental profile of the biobased plastic raw materials used in the product, separate components, and/or packaging (template available) using an independently third-party certification that refers to the methodology currently available.
- Declaration of compliance supported by a valid, independently certified chain of custody certificate for the suppliers of all biobased plastics raw materials used in the product, separate components and/or packaging (template available).

⚠ *The audited accounting documents shall be valid for the whole duration of the EU Ecolabel license*

⚠ *Competent bodies will check the accounting documents again twelve months after the awarding of the EU Ecolabel license*

⚠ *In case the certification scheme does not specifically require that all virgin material is sourced from non-GMO species, additional evidence shall be provided to demonstrate this.If waste management is outsourced, the sub-contractor shall provide a declaration of compliance with this criterion as well*

Once the above requirements are fulfilled,

⚠ *The final product, separate components, and/or packaging may be voluntarily labelled as containing biobased plastic by means of a claim*

Voluntary claim to set on the sales packaging

The voluntary claim shall be that 'x % of plastic contained in the product [separate components, and/or packaging] is biobased' (where x >1, and x is the exact and measurable share of biobased plastic content in the product [separate components, and/or packaging])

⚠ *Generic claims such as 'bioplastics', 'biobased', 'plant-based', 'natural-based' and similar shall not be used.*

The claim shall specify if the percentage refers to all the biobased plastic raw materials in the sum of the final product, separate components and packaging (jointly) or to the biobased plastic raw materials of the item containing biobased plastic (in the final product, separate components and/or packaging).

How to determine the biobased carbon content of the synthetic polymers and plastic materials present in the product, separate component, and/or packaging:

- Use standards based on radiocarbon methods: EN 16640, EN 16785, ASTM D 6866-12 or equivalent

⚠ *When radiocarbon methods cannot be used, the mass balance method is allowed if a high level of transparency and accountability is ensured and supported by agreed standards.*

⚠ *The proofs of purchase for the biobased plastic raw materials shall be based on processes according to the segregation or mass balance systems*

⚠ *The use of purchased certificates based on the Book & Claim system is excluded*

The applicant shall provide detailed calculations leading to the declared percentage of biobased plastic raw materials used in the product, separate components, and/or packaging.

The percentage shall refer, either, to all the biobased plastic raw materials in the sum of the final product, separate components and/or packaging (jointly) or to the biobased plastic raw materials in the final product, separate components or packaging (separately).

Required documentation:

- High resolution photograph of the sales packaging, where information regarding the biobased plastic claim appears clearly (if applicable).
- Information and documentation on how the biobased carbon content of the synthetic polymers and plastic materials present in the product, separate component, and/or packaging was determined (template available).

Criterion 6: Material efficiency in the manufacturing of the final product

This criterion aims to limiting the amount of waste that is sent to landfill or incineration in the final product manufacturing assembly site. The waste recovered for reuse, recycling or energy production is not targeted by this criterion.

⚠ *Requirements in this criterion shall apply to the final product assembly site.*

The quantity of waste generated during the manufacturing and packaging of the products which is sent to landfill or incineration without energy recovery, shall not exceed:

(a) 8 % by weight of the end products for tampons,
(b) 4 % by weight of the end products for all the other products.
Information to be included in the declaration of compliance with this criterion relates to the quantity of waste that has not been reused within the manufacturing process or that is not converted into materials and/or energy.

The applicant shall present all of the following:

- Weight of the product and of the packaging
- All waste streams generated during the manufacturing
- Respective treatment processing of the fraction of recovered waste and that disposed of to landfill or incineration.

⚠ *The quantity of waste sent to landfill or to incineration without energy recovery shall be calculated as the difference between the amount of waste produced and the amount of waste recovered (reused, recycled, etc).*

Interpretation of criterion

- The total quantity of waste generated during manufacturing and packaging of the product must be reported indicating how different fractions are handled, treated and, if it is the case, reused or recovered.
- Fractions of waste that are reused or converted into useful materials and/or energy shall be subtracted from the total.
- Treatment processes not providing added value in terms of materials and/or energy recovery (e.g. incineration without energy recovery) shall not be subtracted from the total.

Required documentation:

Declaration of compliance with the criterion (template available).

Criterion 7: Excluded and restricted substances

7.1 Restrictions on substances classified under Regulation (EC) No 1272/2008

This sub-criterion applies to ingoing substances added to the chemical product used in the final product and in any component of it.

This sub-criterion covers restricted and excluded substances under Regulation (EC) No 1272/2008.

This criterion does not apply to:

- substances not included in the scope of Regulation (EC) No 1907/2006 as defined in Article 2(2) of that Regulation;
- substances covered by Article 2(7)(b) of Regulation (EC) No 1907/2006, which sets out the criteria for exempting substances included in Annex V to that Regulation from the registration, downstream user and evaluation requirements.

Excluded substances

The final product and any components therein shall not contain ingoing substances (added as such or in mixtures) that are assigned any of the hazard classes, categories and associated hazard statement codes stated in Table 6 in Annex I to Commission Decision (EU) 2023/1809 (and also reported below).

⚠ *Such ingoing substances shall thus not be intentionally added to the chemical product used in the final product*

⚠ *Classified substances according to Table 6 in Annex I to Commission Decision (EU) 2023/1809 can only occur as impurities in the raw material, and always in a concentration lower than 0.0100% w/w of the chemical product that is added to the final product, unless further restricted under criterion 7.3.8.*

⚠ *Substances known to be released or to degrade from ingoing substances are considered ingoing substances and not impurities and shall comply with this requirement*

Table 6 Excluded hazard classes, categories and associated hazard statement codes

Carcinogenic, mutagenic or toxic for reproduction	
Categories 1A and 1B	Category 2
H340 May cause genetic defects	H341 Suspected of causing genetic defects
H350 May cause cancer	H351 Suspected of causing cancer
H350i May cause cancer by inhalation	-
H360F May damage fertility	H361f Suspected of damaging fertility

H360D May damage the unborn child	H361d Suspected of damaging the unborn child
H360FD May damage fertility. May damage the unborn child	H361fd Suspected of damaging fertility. Suspected of damaging the unborn child
H360Fd May damage fertility. Suspected of damaging the unborn child	H362 May cause harm to breast fed children
H360Df May damage the unborn child. Suspected of damaging fertility	
Acute toxicity	
Categories 1 and 2	Category 3
H300 Fatal if swallowed	H301 Toxic if swallowed
H310 Fatal in contact with skin	H311 Toxic in contact with skin
H330 Fatal if inhaled	H331 Toxic if inhaled
H304 May be fatal if swallowed and enters airways	EUH070 Toxic by eye contact
Specific target organ toxicity	
Category 1	Category 2
H370 Causes damage to organs	H371 May cause damage to organs
H372 Causes damage to organs through prolonged or repeated exposure	H373 May cause damage to organs through prolonged or repeated exposure
Respiratory and skin sensitisation	
Category 1A	Category 1B
H317 May cause allergic skin reaction	H317 May cause allergic skin reaction
H334 May cause allergy or asthma symptoms or breathing difficulties if inhaled	H334 May cause allergy or asthma symptoms or breathing difficulties if inhaled
Endocrine disruptors for human health and the environment	
Category 1	Category 2
EUH380: May cause endocrine disruption in humans	EUH381: Suspected of causing endocrine disruption in humans
EUH430: May cause endocrine disruption in the environment	EUH431: Suspected of causing endocrine disruption in the environment
Persistent, Bioaccumulative and Toxic	
PBT	vPvB
EUH440: Accumulates in the environment and living organisms including in humans	EUH441: Strongly accumulates in the environment and living organisms including in humans
Persistent, Mobile and Toxic	

PMT	vPvM
EUH450: Can cause long-lasting and diffuse contamination of water resources	EUH451: Can cause very long-lasting and diffuse contamination of water resource

The hazard statement codes generally refer to substances. However, if information on substances cannot be obtained, the classification rules for mixtures shall apply.

The most recent classification rules adopted by the Union shall take precedence over the listed hazard classifications. Applicants shall therefore ensure that any classifications are based on the most recent classification rules.

For classified impurities, the applicant (or the supplier) shall use the concentration of the restricted impurity and an assumed retention factor of 100% in order to estimate the quantity of the impurity remaining in the chemical product.

The use of substances or mixtures that are chemically modified during the production process, so that any relevant hazard for which the substance or mixture has been classified under Regulation (EC) No 1272/2008 no longer applies, shall be exempted from the above requirement. This includes, for example, modified polymers and monomers or additives which become covalently bonded within plastics.

⚠ *Justifications for any deviation from a retention factor of 100% (e.g. solvent evaporation) or for chemical modification of a restricted impurity shall be provided.*

Restricted substances

The final product and any components therein shall not contain ingoing substances (added as such or in mixtures) in concentrations greater than 0,010% (weight by weight) in the chemical product that are assigned any of the hazard classes, categories and associated hazard statement codes stated in Table 7 in Annex I to Commission Decision (EU) 2023/1809 (and also reported below).

⚠ *The concentration of such ingoing substances shall be calculated with respect to the chemical product that is added to the final product*

⚠ *Substances known to be released or to degrade from ingoing substances are considered ingoing substances and not impurities and shall comply with this requirement*

Table 7 Restricted hazard classes, categories and associated hazard statement codes

Hazardous to the aquatic environment	
Categories 1 and 2	Category 3 and 4
H400 Very toxic to aquatic life	H412 Harmful to aquatic life with long-lasting effects
H410 Very toxic to aquatic life with long-lasting effects	H413 May cause long-lasting effects to aquatic life
H411 Toxic to aquatic life with long-lasting effects	
Hazardous to the ozone layer	

H420 Harms public health and the environment by destroying ozone in the upper atmosphere	-

The hazard statement codes generally refer to substances. However, if information on substances cannot be obtained, the classification rules for mixtures shall apply.

The most recent classification rules adopted by the Union shall take precedence over the listed hazard classifications. Applicants shall therefore ensure that any classifications are based on the most recent classification rules.

For substances with a restricted classification, the applicant (or the supplier) shall use the concentration of the restricted substance and an assumed retention factor of 100% in order to estimate the quantity remaining in the chemical product.

The use of substances or mixtures that are chemically modified during the production process, so that any relevant hazard for which the substance or mixture has been classified under Regulation (EC) No 1272/2008 no longer applies, shall be exempted from the above requirement. This includes, for example, modified polymers and monomers or additives which become covalently bonded within plastics.

⚠ *Justifications for any deviation from a retention factor of 100% (e.g. solvent evaporation) or for chemical modification of a restricted substance shall be provided.*

Derogated substances

Substances with an excluded or restricted hazard class that are derogated from criterion 7.1 are listed in Table 8 of Commission Decision (EU) 2023/1809 (and also reported below).

Table 8 Derogated substances and derogation conditions

Substance type	Derogated hazard classes	Derogation conditions
2-methyl-2H-isothiazol-3-one (MIT)	H400, H314, H301, H311, H318, H410, H330 and H317	Only in water-soluble inks and in a concentration lower than 15 ppm in the ink (before application) and lower than 0.1 ppm in the final product. The ink shall also comply with sub-criterion 7.3.4
Dipropylene glycol dibenzoate	H412	Only in hot melt adhesives that are used to indicate wetness
H304 substances and mixtures	H304	Substances with a viscosity under 20.5 cSt at 40°C.
Titanium dioxide (nano form)	H351	Only when used as pigment. It cannot be used in powder or spray form.

Required documentation:

- Declaration of compliance with this sub-criterion (template available separately)
- A list of the restricted substances and mixtures used in the chemical products added to the final product, as well as their concentration. A template is available as part of the electronic Application Form.

> ⚠ *The information provided shall relate to the forms or physical states of the substances or mixtures as used in the final product.*

- Safety Data Sheets or chemical supplier declarations of all substances used in the chemical products added to the final product.
- In case of deviation from a retention factor of 100% for a substance, written justification shall be provided
- For substances exempted from sub-criterion 7.1 (see Annexes IV and V to Regulation (EC) No 1907/2006), a declaration by the applicant shall be provided
- The following technical information shall be provided to support the declaration of classification or non-classification for each substance and mixture:
  - for substances that have not been registered under Regulation (EC) No 1907/2006 or which do not yet have a harmonised CLP classification: information meeting the requirements listed in Annex VII to that Regulation;
  - for substances that have been registered under Regulation (EC) No 1907/2006 and which do not meet the requirements for CLP classification: information based on the REACH registration dossier confirming the non-classified status of the substance;
  - for substances that have a harmonised classification or are self-classified: safety data sheets where available. If these are not available or the substance is self-classified then information shall be provided relevant to the substance's hazard classification in accordance with Annex II to Regulation (EC) No 1907/2006;
  - in the case of mixtures: safety data sheets where available. If these are not available then calculation of the mixture classification shall be provided according to the rules under Regulation (EC) No 1272/2008 together with information relevant to the mixtures hazard classification in accordance with Annex II to Regulation (EC) No 1907/2006.

7.2 Substances of Very High Concern (SVHCs)

This sub-criterion applies to ingoing substances added to the chemical product used in the final product and in any component of it.

The final product and any components therein shall not contain ingoing substances (added as such or in mixtures) that meet the criteria referred to in Article 57 of Regulation (EC) No 1907/2006 of the European Parliament and of the Council that have been identified according to the procedure described in Article 59 of that Regulation and included in the candidate list for substances of very high concern for authorisation

- ⚠ *SVHCs shall thus not be intentionally added to the chemical product used in the final product*
- ⚠ *SVHCs can only occur as impurities in the raw material, and always in a concentration lower than 0.0100% w/w of the chemical product that is added to the final product, unless further restricted under criterion 7.3.8.*
- ⚠ *Substances known to be released or to degrade from ingoing substances are considered ingoing substances and not impurities and shall comply with this requirement*

As the SVHCs list is dynamic and in continuous update, attention should be paid to check the latest list available on the submission date of the EU Ecolabel application.

- The latest list can always be found at: http://echa.europa.eu/chem_data/authorisation_process/candidate_list_table_en.asp

For SVHCs occurring as impurities, the applicant (or the supplier) shall use the concentration of the impurity and an assumed retention factor of 100% in order to estimate the quantity of the impurity remaining in the chemical product.

The use of substances or mixtures that are chemically modified during the production process, so that any relevant hazard for which the substance or mixture has been classified under Regulation (EC) No 1272/2008 no longer applies, shall be exempted from the above requirement. This includes, for example, modified polymers and monomers or additives which become covalently bonded within plastics.

- ⚠ *Justifications for any deviation from a retention factor of 100% (e.g. solvent evaporation) shall be provided.*

Required documentation:

- Declaration of compliance with this sub-criterion (template available separately)
- A list of all known SVHC impurities in the chemical products added to the final product, as well as their concentration. A template is available as part of the electronic Application Form.
- Safety Data Sheets or chemical supplier declarations of all SVHC impurities occurring in the chemical product added to the final product.
- In case of deviation from a retention factor of 100% for a SVHC impurity, written justification shall be provided

7.3 Other specific restrictions

7.3.1 Specified excluded substances

This sub-criterion applies to ingoing substances added to the chemical product used in the final product and in any component of it.

The following substances shall not be added (alone or in mixtures) to the final product, nor in any components therein

- ⚠ *The substances listed in this sub-criterion are thus only allowed as impurities, and nevertheless in concentrations lower than 0.0100% w/w in the chemical product, unless further restricted under criterion 7.3.8.*
- ⚠ *Substances known to be released or to degrade from ingoing substances are considered ingoing substances and not impurities.*

- 5-chloro-2-methyl-4-isothiazoline-3-one (CMIT)
- Acrylamide in superabsorbent polymers
- Alkyl phenol ethoxylates (APEOs) and other alkyl phenol derivatives
  - ⚠ *Sterically hindered phenolic antioxidants with molecular weight (MW) >600 g/mole are allowed*
  - Substance name = "Alkyl phenol", under: https://echa.europa.eu/es/advanced-search-for-chemicals
- Antibacterial agents (e.g. Nanosilver and triclosan)
  - ⚠ *Antibacterial agent are chemicals/products that inhibit or stop growth of microorganisms such as bacteria, fungi or protozoa (single-celled organisms)*
- Formaldehyde and formaldehyde releasers
  - ⚠ *The use of formaldehyde and formaldehyde releasers in adhesives is regulated according to sub-criterion 7.3.5*
- Nitromusks and Polycyclic musks
- Organotin compounds used as a catalysts in the production of silicon
- Parabens
- Phthalates
  - ⚠ *DINP used in adhesive formulations is allowed at a maximum concentration of 0.010% weight by weight of the adhesive formulation*
- Substances identified to have endocrine disrupting properties

Substances identified to have endocrine disrupting properties means substances which have been identified to have endocrine disrupting properties (human health and or/environment) according to Article 57(f) of Regulation (EC) No 1907/2006 of the European Parliament and of the Council (candidate list of substances of very high concern for authorisation) or according to Regulations (EU) No 528/2012 or (EC) No 1107/2009 of the European Parliament and of the Council.

⚠ *The National Authorities List I can be consulted, as it includes the substances that have undergone an evaluation of endocrine disrupting properties, as regulated in the EU in PPPR, BPR or REACH, and which are identified as endocrine disruptors*

- https://edlists.org/

⚠ *It is recommended to check the national authority list to have an overview of all identified endocrine disrupting substances evaluated in the context of different EU Regulations (list I).*

⚠ *It is advised to avoid as far as possible the substances in the list II (substances under evaluation for endocrine disruption under an EU legislation), as these are likely to be banned in future EU Ecolabel criteria revisions and/or EU Regulations.*

- Substances considered to be potential endocrine disruptors in category 1 or 2 on the EU's priority list of substances that are to be investigated further for endocrine disruptive effects.
  - The list of such substances can be found in Annex 13, retrievable at this link: https://ec.europa.eu/environment/chemicals/endocrine/strategy/substances_en.htm

Required documentation:

Declaration of compliance with this sub-criterion from the supplier(s) (template available separately)

7.3.2 Fragrances

Fragrances shall not be added to the final product, to any component of it, to the separate components nor to the packaging.

Required documentation:

Declaration of compliance with this sub-criterion from the supplier(s) (template available separately)

7.3.3 Lotions

Lotions shall not be used in the product, nor in any component of it.

Required documentation:

Declaration of compliance with this sub-criterion from the supplier(s) (template available separately)

7.3.4 Inks and dyes

This sub-criterion applies to the final product and any components therein. This sub-criterion does not apply to the separate components, the sales packaging and the information sheets.

The final product and any components therein shall not be dyed or printed on, except for:

- tampon strings;
- closing systems;
- materials that are not directly in contact with the skin, if the dye or ink fulfils specific functions or decorative purposes

  ⚠ *examples of this last exemption includes dying to reduce visibility of the product through white or light coloured clothes, to show landing zones of tapes, to indicate the wetness and to indicate the back part of a product*

The parts that are dyed or printed on should comply with the following requirements:

— the content of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, primary aromatic amines and polychlorinated biphenyl occurring as impurity in the dying colorants and inks shall be below the limits given in the Council of Europe's Resolution AP (89) 1 on the use of colorants in plastic materials coming into contact with food

  The Council of Europe Resolution AP(89)1 on the use of colorants in plastic materials coming into contact with food is available at: https://rm.coe.int/16804f8648

- dying colorants used in plastic materials shall comply with BfR's recommendations IX. Colorants for Plastics and other Polymers Used in Commodities, or with the Swiss Ordinance 817.023.21 Annex 2 and Annex 10
  - The BfR's recommendations IX. Colorants for Plastics and other Polymers Used in Commodities is available at: https://www.bfr.bund.de/cm/349/IX-Colorants-for-Plastics-and-other-Polymers-Used-in-Commodities.pdf
  - The Swiss Ordinance 817.023.21 Annex 2 is available at: https://www.blv.admin.ch/dam/blv/fr/dokumente/lebensmittel-und-ernaehrung/rechts-und-vollzugsgrundlagen/lebensmittelrecht2017/anhang2-verordnung-materialien-kontakt-lm-gg.pdf.download.pdf/Annexe_2.pdf
  - The Swiss Ordinance 817.023.21 Annex 10 is available at: https://www.blv.admin.ch/dam/blv/en/dokumente/lebensmittel-und-ernaehrung/rechts-und-vollzugsgrundlagen/lebensmittelrecht2017/anhang10-verordnung-materialien-kontakt-lm-gg.pdf.download.pdf/Annex-10-ordinance-fdha-materials-and-articles-intended-to-come-into-contact-with-food-stuffs.pdf
- dying colorants used in cellulosic materials shall comply with BfR's recommendation XXXVI. Paper and board for food contact
  - The BfR's recommendation XXXVI. Paper and board for food contact is available at: https://www.dssmith.com/contentassets/1bbf9877253f458aa0eed26b76f2d705/360-english.pdf

⚠ *The dying colorants and inks used shall also comply with sub-criteria 7.1, 7.2 and 7.3*

Required documentation:

- Declaration of compliance with this sub-criterion (template available separately)
- Chemical supplier declarations, if relevant
- If dyes and/or inks are used, the following shall be provided:
  - written justification of the specific function provided by dying or printing certain parts of the product;
  - documentation showing that impurities in the dying colorant or ink comply with the Council of Europe's Resolution AP (89) 1;
  - documentation showing that the used dyes are authorised according to BfR's recommendations IX. Colorants for Plastics and other Polymers Used in Commodities, Swiss Ordinance 817.023.21 Annex 2 and Annex 10 (if used in plastic materials);
  - documentation showing that the used dyes are authorised according to BfR's recommendation XXXVI. Paper and board for food contact (if used in cellulosic materials).

7.3.5 Further restrictions applying to adhesives

This sub-criterion applies to the adhesives used in the final product and any component of it.

The content of free formaldehyde in hardened adhesive (glue) shall not exceed 10 ppm.

The maximum limit for the content of formaldehyde generated during adhesive production shall be 250 ppm, measured in newly produced polymer dispersion.

⚠ *HotmeIt adhesives are exempted from this requirement*

The content of formaldehyde in adhesives can be determined using derivatisation and analysis with GC-MSD (Gas chromatography-mass spectrometry) or HPLC (high performance liquid chromatography) with UV detection.

The recommended test method for the measurement of formaldehyde emissions is the ISO 14184-1:2011. Equivalent test methods will also be accepted.

⚠ *The adhesives used shall also comply with sub-criteria 7.1, 7.2 and 7.3.1*

Required documentation:

- Declaration of compliance with this sub-criterion from the supplier(s) (template available separately)
- Safety data sheets (SDS) of any substance/mixture in the adhesive and information on their concentration in the adhesive
- Test results for the content of formaldehyde

7.3.6 Super absorbent polymers (SAP)

This sub-criterion applies to the super absorbent polymers (SAP) used in the final product and any component of it.

The maximum content of residual monomers that are classified with the H-codes reported in sub-criterion 7.1in SAP is 1 000 ppm.

⚠ *Residual monomers are intended as the total of unreacted acrylic acid and crosslinkers*

⚠ *For sodium polyacrylate this limit applies to the sum of unreacted acrylic acid and cross linking agents.*

The tested quantities for residual monomers and soluble extracts shall be averages from repeated measures over a certain period of time. Recommended test methods are ISO 17190 and WSP 210.

The maximum content of water soluble extracts in SAP is 10% weight by weight.

ISO 17190 is recommended as a test method.

⚠ *Water-soluble extracts in SAP are intended as monomers and oligomers of acrylic acid with a lower molecular weight than the one of SAP, and salts*

⚠ *For sodium polyacrilate these represent monomers and oligomers of acrylic acid with lower molecular weight than the superabsorbent polymer*

Acrylamide shall not be included in superabsorbent polymers

⚠ *The SAP and its ingredients (including water soluble extracts) shall also comply with sub-criteria 7.1, 7.2 and 7.3.1*

Required documentation:

- Declaration of compliance with this sub-criterion from the supplier(s) (template available separately)
- Safety data sheets (SDS) of any substance/mixture in the chemical product and information on their concentration in the final product
- SDS or test results specifying the presence and concentration of the residual monomers contained in the SAP

⚠ *The test report shall describe the information on the methods used, the measurement frequency for the analyses, and the laboratories carrying out the analysis*

7.3.7 Silicone

This sub-criterion applies to the release liner used in the final product.

Solvent-based silicone coatings shall not be used.

The maximum concentration of octamethyl cyclotetrasiloxane (D4 – CAS no.: 556-67-2), decamethyl cyclopentasiloxane (D5 – CAS no.: 541-02-6) and dodecamethylcyclohexasiloxane (D6 – CAS no.: 540-97-6) in the silicone mixture is 800 ppm (0,08 % w/w).

⚠ *Silicone mixture is intended here as the liquid mixture composed of two or more silicone raw materials that is used as a coating on the protective paper or the protective film used for the release liner on some feminine hygiene products (e.g. panty liners and sanitary towels) or on nappy tapes*

⚠ *The 800 ppm limit is to be applied to each substance (D4, D5 and D6) separately*

⚠ *The silicone mixture and its ingredients shall also comply with sub-criteria 7.1, 7.2 and 7.3*

Silicones

Silicones (or polysiloxanes) are used in general to protect the adhesive and to achieve a grease- or water-repellent effect as well as a release effect. When they are used in release liners, silicone coating adheres to the material to be treated in the form of a thin layer, especially to low-porosity and smooth paper substrates. There are release liners which use different types of substrates (papers, films, and combinations), many different types of silicone coatings, and at a wide range of weights/amounts.

Required documentation:

- Declaration of compliance with this sub-criterion signed by the manufacturer of the release liner (template available separately)
- Safety data sheets (SDS) of the substances constituting the silicone mixture

7.3.8 Other chemicals of concern

This sub-criterion applies to the final product.

The following chemicals shall not be present in the final product in a concentration higher than what indicated in Table 9 of Annex I to Commission Decision (EU) 2023/1809 (also reported below)

Table 9 List of restricted chemicals in the final product

Substances	Restrictions
Formaldehyde	< 16 ppm
Dibenzo-p-dioxins (PCDDs): 2,3,7,8-TCDD; 1,2,3,7,8-PeCDD; 1,2,3,4,7,8-HxCDD; 1,2,3,6,7,8-HxCDD; 1,2,3,7,8,9-HxCDD; 1,2,3,4,6,7,8-HpCDD; OCDD	sum TEQ of the detected congeners of PCDDs, PCDFs and DLPCBs < 2ng/kg
Dibenzofurans (PCDFs): 2,3,7,8-TCDF; 1,2,3,7,8-PeCDF; 2,3,4,7,8- PeCDF; 1,2,3,4,7,8-HxCDF; 1,2,3,6,7,8-HxCDF; 1,2,3,7,8,9-HxCDF; 2,3,4,6,7,8-HxCDF; 1,2,3,4,6,7,8-HpCDF; 1,2,3,4,7,8,9-HpCDF; OCDF	
DLPCBs: PCB 77; PCB 81; PCB 126; PCB 169; PCB 105; PCB 114; PCB 118; PCB 123; PCB 156; PCB 157; PCB 167; PCB 189	
PAHs	
Benzo[a]anthracene; Benzo[a]pyrene; Benzo[e]pyrene; Chrysene; Benzo[b]fluoranthene; Benzo[k]fluoranthene; Dibenzo[a,h]anthracene; Benzo[j]fluoranthene; Benzo[g,h,i]perylene; Indeno[1,2,3,cd]pyrene; Phenanthrene; Pyrene; Anthracene; Fluoranthene; Naphthalene	Each PAH < 0,2 mg/kg Sum PAHs < 1 mg/kg
Phenols	
Bisphenol A	< 0,02 %
Nonylphenol-di-ethoxylate	< 10 mg/kg
Nonylphenol	< 10 mg/kg
Phthalates	
DINP, DEHP, DNOP, DIDP, BBP, DBP, DiBP, DIHP, BMEP, DPP/DIPP, DnPP, DnHP, DMP, DHNUP, DCHP, DHxP, DIHxP, DIOP, DPrP, DNP, 1,2-benzenedicarboxylic acid, di-C6-10 alkyl esters, 1,2-benzenedicarboxylic acid, mixed decyl and hexyl and octyl diesters	< 0,01% each
Pesticides	

Glyphosate	< 0,5 mg/kg
AMPA	< 0,5 mg/kg
Quintozene	< 0,5 mg/kg
Hexachlorobenzene	< 0,5 mg/kg
Organotins	
Tributyltin	< 2 ppb
Other organotins: Monobutyltin; Dibutyltin; Triphenyltin; Dioctyltin; Monooctyltin	Each organotin < 10ppb
Heavy metals	
Antimony	< 30 mg/kg
Cadmium	< 0,1 mg/kg
Chromium	< 1 mg/kg
Lead	< 0,2 mg/kg
Mercury	< 0,02 mg/kg

The applicant shall carry out test analyses on a representative product or separately on each of the material composing the final (representative) product.

⚠ *In the case of identically produced products (e.g. hygiene products of different sizes), it is sufficient to carry out tests on one of the product sizes*

Recommended test methods are NWSP 360.1R0 for the sample preparation, NWSP 360.2R0 for the analyte extraction, and NWSP 360.3R0 for the instrumental analysis.

⚠ *Equivalent test methods can be accepted by the Competent Bodies.*

The frequency of the measurement shall be at least once a year.

Required documentation:

- Declaration of compliance with this sub-criterion (template available separately)
- Test report containing the results of the analyses performed on the final product

⚠ *The test report should describe the methods used, the date of the measurement for the analyses, and the information of the laboratories used for the analysis.*

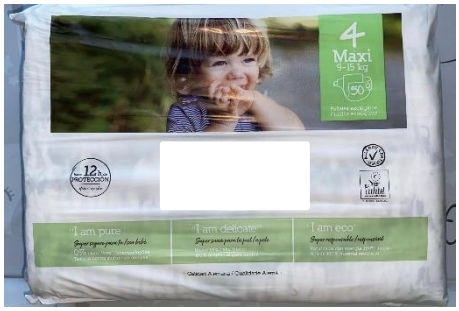
Criterion 8: Packaging

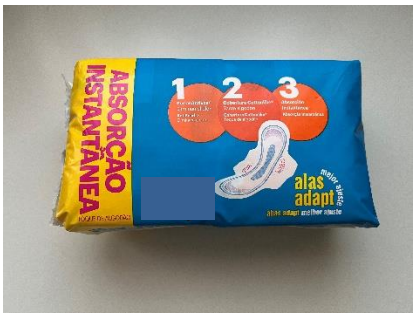
This criterion aims at introducing certain percentages of recycled content and recyclability in the packaging of absorbent hygiene products.

⚠ *This criterion sets requirements for sales and grouped packaging.*

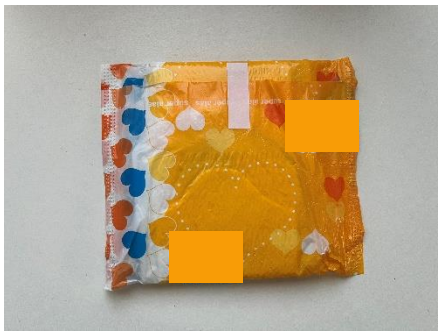
⚠ *Grouped packaging shall be avoided or made of only cardboard and/or paper.*

Sales packaging (primary packaging)

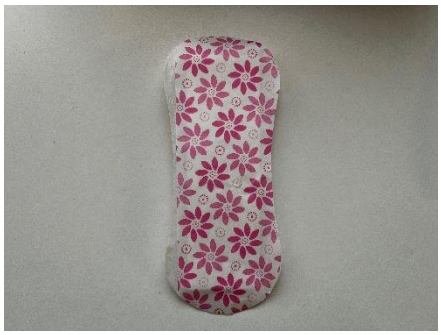




Separate component (additional component)



Bag for pads/ tampons



Release liner in nappies/pads

(a) Cardboard and/or paper used for packaging

⚠ *Sales packaging made of cardboard and/or paper shall contain a minimum 40% of recycled material.*

⚠ *Grouped packaging made of cardboard and/or paper shall contain a minimum 80% of recycled material.*

⚠ *The remaining share (100% minus recycled content percentage) of cardboard and/or paper used for the sales and grouped packaging shall be covered by valid Sustainable Forestry Management certificates issued by an independent third-party certification*

scheme such as FSC, PEFC or equivalent. The certification bodies issuing Sustainable Forestry Management certificates shall be accredited/recognised by that certification scheme.

(b) Plastic used for packaging

⚠ *Until 31 December 2026, sales packaging made of plastic shall contain a minimum 20% recycled material.*

⚠ *From 1 January 2027, sales packaging made of plastic shall contain a minimum 35% recycled material.*

- Recycled content shall be verified by complying with the EN 45557 or ISO 14021.
- Plastic recycled content in the packaging shall comply with chain of custody standards such as ISO 22095 or EN 15343.
- Equivalent methods may be accepted if considered equivalent by a third-party, and shall be accompanied by detailed explanations showing compliance with this requirement and related supporting documentation. Invoices demonstrating the purchase of the recycled material shall be provided.

(c) Recyclability

⚠ *The content of the sales packaging (either cardboard and/or paper or plastic) and grouped packaging (cardboard and/or paper) that is available for recycling shall be a minimum of 95% by weight, while 5% residuals shall be compatible with recycling.*

- Recyclability shall be verified by complying with the EN 13430 or ISO 18604.
- In addition, recyclability (availability and compatibility for recycling) of the packaging shall be tested by means of standard testing protocols. Cardboard and/or paper packaging recyclability shall be assessed through repulpability testing and in this case, the applicant shall demonstrate cardboard and/or paper packaging repulpability supported by the result(s) of test report(s) according to the PTS method PTS-RH 021, the ATICELCA 501 evaluation system or equivalent standard methods that are accepted by the competent body as providing data of equivalent scientific quality. Segregation schemes or controlled blending schemes like RecyClass shall be accepted as independent third-party certification for plastic packaging. Equivalent testing methods may be accepted if considered equivalent by a third-party.

(d) Additional requirements

⚠ *Utilisation of composite packaging (sales and grouped), mixed plastics or the coating of the cardboard and/or paper with plastics or metals are not allowed.*

⚠ *Recycled content and recyclability of sales and grouped packaging shall be indicated on the sales packaging.*

- Cardboard and/or paper used for the sales and grouped packaging:
  - ⚠ *The audited accounting documents shall be valid for the whole duration of the EU Ecolabel license.*
  - ⚠ *Competent bodies will check the accounting documents again twelve months after the awarding of the EU Ecolabel license.*
- Sales packaging made of plastic:
  - ⚠ *Competent bodies shall check the declaration of compliance specifying the percentages of plastic recycled content for sales packaging again after 1 January 2027.*

Required documentation:

- Declaration of compliance for recycled content and recyclability (template available).
- Audited accounting documents demonstrating the percentage (100% minus recycled content percentage) of the cardboard and/or paper used for the sales and grouped packaging is defined as certified material according to valid FSC, PEFC or equivalent schemes.
- Related supporting documentation regarding standard methods used for recycled content and recyclability compliance.
- Invoices demonstrating the purchase of the recycled material.
- High resolution photograph of the sales packaging (clearly visible information regarding recycled content and recyclability of the sales and grouped packaging).

Criterion 9: Guidance on the use and on the disposal of the product and of the packaging

This criterion aims:

(1) at offering guidance on the use of the product;
(2) at providing the consumer with the correct information in order for disposal of the waste product and of the packaging.

To that end:

- Instructions for the use of the final product shall be made available on the packaging or through a printed and/or digital leaflet.
- The sales packaging shall contain guidance regarding disposal of the sales packaging, the grouped packaging (if any), the separate components and for the disposal of the used product. The following information shall be written or indicated through visual symbols on the sales packaging:

  - ⚠ *that the sales packaging, the grouped packaging (if any), the separate components and the used product shall not be flushed into toilets, and*
  - ⚠ *how to correctly dispose of the sales packaging, the grouped packaging (if any), the separate components and the used product.*

Correct disposal is determined also by other factors than those purely related to the product itself (i.e. nature of the material to be disposed [plastic, cardboard/or paper]). For example, waste collection and management systems may differ within each Member State of the EU. Consequently, competent bodies should account for this potential heterogeneity at the time of interpreting what 'dispose correctly' means.

Required documentation:

- Declaration of compliance with the criterion (template available).
- High resolution photograph of the instructions for use of the product.
- High resolution photograph of the sales packaging (clearly visible information regarding disposal).

Criterion 10: Fitness for use and quality of the product

The aim of this criterion is to address the performance tests that AHP must undergo to fulfil all important characteristics and functions of the product.

The quality of products awarded with the EU Ecolabel is one of the most important aspects of the scheme, which must be considered in order to prevent creating the image that EU Ecolabel products are environmentally friendly but poor in performance/inefficient.

The effectiveness /quality of the final product shall be satisfactory and at least equivalent to that of products already on the market.

Fitness for use shall be tested with respect to the characteristics and the parameters reported in Table 10. Performance thresholds shall be matched, where these have been identified.

Table 10 : Characteristics and parameters describing the fitness for use of the product to be tested

Characteristic		Testing practice required (performance threshold)			
		Baby diapers	Feminine care pads	Tampons	Nursing pads
In-use tests	U1. Absorption and leakage protection (*)	Consumer panel test (Leakage occurs in less than 5 % of the product uses)			
	U2. Skin dryness	Consumer panel test (80 % of the consumers testing the product shall rate the performance as satisfactory)		Not applicable	As for baby diapers and feminine care pads
	U3. Fit and comfort	Consumer panel test (80 % of the consumers testing the product shall rate the performance as satisfactory)			
	U4. Overall performance	Consumer panel test (80 % of the consumers testing the product shall rate the performance as satisfactory)			
Technical tests	T1. Absorption and leakage protection	Absorption rate and absorption before leakage		Syngina method	As for baby diapers and feminine care pads
	T2. Skin dryness	TEWL, rewet method or corneometric testing		Not applicable	As for baby diapers and feminine care pads
(*)*Panty liners intended to protect the feminine lingerie (light panty liners) are derogated from these requirements.*					

❖ In-use and technical tests guidelines:

- A test report shall be provided for in-use and technical tests. The test report shall describe, as a minimum, the test methods, test results and data used.
- Tests shall be conducted for all the specific type and size of products for which the EU Ecolabel application is made. Nevertheless, if it can be demonstrated that products have the same performance, only one size or a representative mix of sizes per each product design shall be tested.
- Special care shall be taken regarding sampling, transport and storage of the products to guarantee reproducible results. It is recommended not to blind products or repack them in neutral packaging due to the risk of altering the performance of products and/or packaging, unless alteration can be excluded.
- Information on testing shall be made available to the competent bodies under the respect of confidentiality. Test results shall be clearly explained and presented in language, units and symbols that are understandable to the data user. The following elements shall be specified: place and date of the tests; criteria used to select the products tested and their representativeness; selected testing characteristics and, if applicable, the reasons why some were not included; test methods used and their limitations if any. Clear guidelines on the use of test results shall be provided.

❖ Additional guidelines for in-use tests:

- Sampling, test design, panel recruitment and the analysis of test results shall comply with standard statistical practices (AFNOR Q 34-019[8], ASTM E1958-07e1[9] or equivalent).
- Each product shall be assessed on the basis of a questionnaire. The test is to last at least 72 hours, a full week when possible, and shall be realised in normal conditions of use of the product.
- The recommended number of testers shall be at least 30 (for products specifically designed or not for one gender). All the individuals participating to the survey shall be current users of the specific type/size of product tested.
- When the product is not designed specifically for a single gender, the ratio of male to female individuals shall be 1:1.
- A mixture of individuals representing proportionally different groups of consumers available on the market shall take part to the survey. Age, countries and genders shall be clearly stated.
- Sick individuals and those with a chronic skin condition shall not participate in the test. In cases where individuals become ill during the user trial, this is to be indicated on the questionnaire and the answers shall not be taken into consideration for the assessment.
- For all in-use tests (absorption and leakage protection, skin dryness, fit and comfort and overall performance), 80% of the consumers testing the product shall rate the performance as satisfactory, with a rate above 60 assigned by the consumer (on a quantitative scale from 1 to 100). Alternatively, 80% of the consumers testing the product shall rate it as good or very good (among five qualitative options: very poor, poor, average, good, very good).
- The results shall be statistically evaluated after the user trial has been completed.

[8] https://www.boutique.afnor.org/en-gb/standard/q34019/sanitary-and-domestic-articles-test-method-under-conditions-of-use-for-chil/fa039217/11448

[9] https://www.astm.org/e1958-07e01.html

- External factors such as branding, market shares and advertising that may have an impact on the perceived performance of the products shall be communicated.

❖ Additional requirements for technical tests:

- Test methods shall be based as much as possible on product-relevant, reproducible and rigorous methods.
- A minimum of five samples shall be tested. Average results shall be reported together with indication of the standard deviation.
- Technical tests recommended for nursing pads are the same as for baby diapers and for feminine care pads.

⚠ *Weight, dimensions and design features of the product shall be described and provided in accordance with information provided in the application general assessment and verification text*

Examples on the testing protocols (for technical test):

International Consumer Research & Testing (ICRT) performs technical tests such as absorption speed before leakage, leakage test and rewet testing conditions for baby diapers. Their methodology provides different thresholds used as reference for establishing a rating based on 5 stars. More information: https://www.international-testing.org/

EDANA has developed guidelines for testing feminine hygiene products and baby diapers:

(1) Guidelines for testing baby diaper: https://www.edana.org/docs/default-source/international-standards/edana-diaper-test-protocol-2-0-final.pdf?sfvrsn=213c4e0_2 (EDANA, 2016)

(2) Guidelines for testing feminine hygiene products https://www.edana.org/docs/default-source/international-standards/femcare-testing-guidelines-final.pdf?sfvrsn=b3f31df6_2 (EDANA, 2018)

In the table of Harmonized Nonwovens Standard Procedures from EDANA updated in May 2023 (https://www.edana.org/docs/default-source/international-standards/table-of-content-nw-standard-procedures-20210105.pdf?sfvrsn=4ede1add_20):

(1) Listed tests methods for permeability (absorption rate/time of penetration) of baby diapers are Nonwoven Coverstock Liquid Strike-Through Time Using Simulated Urine NWSP 070.3.R1 (19), Repeated Liquid Strike-Through Time (Simulated Urine) NWSP 070.7.R2 (20) and Wetback After Repeated Strike-Through Time (Simulated Urine) NWSP 070.8.R1 (19).

(2) Listed test method for absorption before leakage is Absorption Before Leakage Using an Adult Mannequin NWSP 354.0.R2 (22).

Also relevant to follow the developments of the Technical Committee ISO/TC 338 for menstrual products: https://www.iso.org/committee/8933440.html

⚠ *Tests shall be carried out by laboratories certified to implement quality management systems.*

Required documentation:

- Declaration of compliance with in-use tests (template available).
- Declaration of compliance with technical tests (template available).
- Test report for in-use tests.
- Test report for technical tests.

Criterion 11: Corporate Social Responsibility with regard to labour aspects

The aim of this criterion is to set guidelines to ensure that the minimum labour standard requirements have been fulfilled by companies applying for the EU Ecolabel, independently from national laws.

⚠ *This criterion sets requirements applying to the final absorbent hygiene product assembly site.*

Applicants shall obtain third-party verification supported by site audit(s) that the following principles included in the International Labour Organisation's (ILO) Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy[10]; the UN Global Compact (Pillar 2)[11]; the UN Guiding Principles on Business and Human Rights[12]; and; the OECD Guidelines for Multinational Enterprises[13], have been respected:

(i) Child Labour:

— Minimum Age Convention, 1973 (No 138)

— Worst Forms of Child Labour Convention, 1999 (No 182)

(ii) Forced and Compulsory Labour:

— Forced Labour Convention, 1930 (No 29) and 2014 Protocol to the Forced Labour Convention

— Abolition of Forced Labour Convention, 1957 (No 105)

(iii) Freedom of Association and Right to Collective Bargaining:

— Freedom of Association and Protection of the Right to Organise Convention, 1948 (No 87)

— Right to Organise and Collective Bargaining Convention, 1949 (No 98)

(iv) Discrimination:

— Equal Remuneration Convention, 1951 (No 100)

— Discrimination (Employment and Occupation) Convention, 1958 (No 111)

Supplementary provisions:

(v) Working Hours:

— ILO Hours of Work (Industry) Convention, 1919 (No 1)

10 ILO NORMLEX (http://www.ilo.org/dyn/normlex/en) and supporting guidance.
11 United Nations Global Compact (Pillar 2), https://www.unglobalcompact.org/what-is-gc/participants/141550.
12 Guiding Principles for Business and Human Rights, https://www.unglobalcompact.org/library/2.
13 OECD Guidelines for Multinational Enterprises, https://www.oecd.org/daf/inv/mne/48004323.pdf.

— ILO Weekly Rest (Industry) Convention, 1921 (No 14)

(vi) Remuneration:

— ILO Minimum Wage Fixing Convention, 1970 (No 131)

— ILO Holidays with Pay Convention (Revised), 1970 (No 132)

— Living wage: The applicant shall ensure that wages (excluding any taxes, bonuses, allowances, or overtime wages) paid for a normal work week (not exceeding 48 hours) shall be sufficient to afford basic needs (housing, energy, nutrition, clothing, health care, education, potable water, childcare, and transportation) of worker and of a family of four people, and to provide some discretionary income. Implementation shall be audited with reference to the SA8000 guidance on 'Remuneration'.

(vii) Health & Safety:

— ILO Safety in the use of chemicals at work Convention, 1981 (No 170)

— ILO Occupational Safety and Health Convention, 1990 (No 155)

— ILO Working Environment (Air Pollution, Noise and Vibration) Convention, 1977 (No 148)

(viii) Social protection and inclusion:

— ILO Medical Care and Sickness Benefits Convention, 1969 (No 130)

— ILO Social Security (Minimum Standards) Convention, 1952 (No 102)

— ILO Employment Injury Benefits Convention, 1964 (No 121)

— ILO Equality of Treatment (Accident Compensation) Convention, 1925 (No 19)

— ILO Maternity Protection Convention, 2000 (No 183)

(ix) Fair dismissal:

— ILO Termination of Employment Convention, 1982 (No 158).

⚠ *In locations where the right to freedom of association and collective bargaining are restricted under law, the company shall not restrict workers from developing alternative mechanisms to express their grievances and protect their rights regarding working conditions and terms of employment, and shall recognise legitimate employee associations with whom it can enter into dialogue about workplace issues.*

⚠ *The audit process shall include consultation with external industry-independent organisation stakeholders in local areas around sites, including trade unions, community organisations, NGOs and labour experts. Meaningful consultations shall take place with at least two stakeholders from two different subgroups. In locations where national law cannot ensure adequacy of corporate social responsibility with the aforementioned*

international conventions, the audit process shall include third-party site audits composed of unannounced spot inspections by industry-independent evaluators.

⚠ *During the validity period of the EU Ecolabel license, the applicant shall publish the aggregated results and key findings from the audits (including details on (a) how many and how serious violations of each labour rights and OHS standard; (b) strategy for remediation – where remediation includes prevention per UNGP concept; (c) assessment of root causes of persistent violations resulting from stakeholder consultation – who was consulted, what issues were raised, how did this influence the corrective action plan), online in order to provide evidence of their performance to interested consumers.*

Third party verification of factory sites to the following standards and codes of conduct shall be recognised as their core criteria reflect the ILO standards:

Equivalent codes of conduct:

- OECD Guidelines for Multi-National Enterprises: Recommendations on human rights and on employment and industrial relations https://www.oecd.org/corporate/mne/
- The United Nations Global Compact: Principles on Human rights and Labour https://unglobalcompact.org/what-is-gc/mission/principles
- The Joint Initiative on Corporate Accountability and Workers Rights (JO-IN): the Draft Code of Labour Practice https://jo-in.org/pub/about.shtml

Equivalent standards:

- ISO 26000: Human rights and Labour practice components https://www.iso.org/iso-26000-social-responsibility.html
- Social Accountability 8000 (SA8000) https://sa-intl.org/
- Ethical Trading Initiative (ETI) https://www.ethicaltrade.org/
- Fair Wear Foundation (FWF) https://www.fairwear.org/
- Business Social Compliance Initiative (BSCI) https://www.amfori.org/content/amfori-bsci
- Fair Labor Association (FLA) https://www.fairlabor.org/

⚠ *Third-party site audits shall be carried out by auditors qualified to assess the compliance of the industry manufacturing sites with social standards or codes of conduct or, in countries where the ILO Labour Inspection Convention, 1947 (No 81) has been ratified and ILO supervision indicates that the national labour inspection system is effective and where the scope of the inspection systems covers the areas listed above, by labour inspector(s) appointed by a public authority.*

⚠ *The third-party certifications shall be not more than 12 months old, on the date of application. The applicant shall demonstrate third party verification of compliance, using independent verification or documentary evidence, including site visits by auditors during the Ecolabel verification process for production sites in the supply chain for the licensed products. These shall take place upon application and subsequently during the license period if new production sites are introduced.*

Required documentation:

- Declaration of compliance with the criterion (template available).
- Copies of the most recent version of the code of conduct for each final product assembly plant for the model(s) to be ecolabelled (consistent with the provisions specified above).
- Copies of the supporting audit reports for each final product assembly plant for the model(s) to be ecolabelled (adding a web link to where online publication of the results and findings can be found).
- Valid certifications from third-party schemes or inspection processes of audit compliance for each final product assembly plant for the model(s) to be ecolabelled (consistent with the provisions specified above).
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Criterion 12: Information appearing on the EU Ecolabel

This criterion aims to inform consumers about the EU Ecolabel environmental preference of the products and to make easier the environmentally friendly choice. In this line, the EU Ecolabel logo may be displayed on the sales packaging of the product.

If the optional label with text box is used, it shall contain the following three statements:

- 'Designed to reduce impact on the environment',
- 'Fulfils strict requirements on harmful substances',
- 'Verified performance',

> ⚠ *The applicant shall follow the instructions on how to use the EU Ecolabel logo as provided in the EU Ecolabel Logo Guidelines:*
> *http://ec.europa.eu/environment/ecolabel/documents/logo_guidelines.pdf*

Required documentation:

- Declaration of compliance with the criterion (template available).
- High resolution photograph of the product sales packaging that clearly shows the EU Ecolabel logo, the registration/license number and, where relevant, the statements that can be displayed together with the logo.