



EU ECOLABEL FOR CONVERTED PAPER

BEUC and EEB comments on the criteria proposal to be voted on 22 November

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Summary

The European Commission has presented a proposal for a Decision establishing the ecological criteria for the award of the EU Ecolabel for converted paper products for a vote by Member States on 22 November.

EEB and BEUC acknowledge the work done by Paper by Nature, Bureau Veritas Certification, the Swedish Competent Body and by DG Environment in the preparation of this proposal.

EEB and BEUC are satisfied that 100% of the virgin fibres used are to be covered by certificates issued by independent third party certification schemes.

EEB and BEUC also welcome that for board substrate the minimum proportion of certified material has now been set on 70%, aligning the EU Ecolabel with the criteria set for labelling by well-established certification schemes in the field of forestry.

EEB and BEUC strongly disagree however with the differentiation made between board substrate and paper substrate and fully support Member States requests to remove these differences by setting also for paper substrate the minimum of certified materials on, at least, 70% of the virgin fibres. In this way, the EU Ecolabel would not lag behind well-established certification schemes in the field of forestry and can comply with green public procurement policies in several Member States.



Criterion 1 – Substrate

PART A – PAPER Substrate

Part A1: Converted paper made of copying and graphic paper

Part A2: Paper which is not in the scope of copying and graphic paper

EEB and BEUC call on the European Commission and Member States to align the requirements as far of the origin of the fibres is concerned with the requirement set for Board Substrate (Criterion B3).

Rationale:

It is crucial that the EU Ecolabel for Converted paper does not go below the green public procurement requirements set by different Member States.

While recognising that the EU Ecolabel covers additional environmental aspects of the product not covered by FSC and PEFC, it is important to consider that origin of the fibres is one of the most important aspects, also from a consumers' perspective. It undermines the credibility of the EU Ecolabel that in this respect the criteria are set below those for labels from well-established certification schemes.

NGOs support that the reference to the Copying and Graphic criteria is used to simplify verification of the criteria. However, this should not restrict the possibilities to set a differentiated requirement for the origin of the fibres as converted paper covers a different scope of products. In other Ecolabels the approach is to harmonise as much as possible with related Ecolabel decisions (such as EU Ecolabel for bed mattresses and textiles), but the basis for the selection can be decided according to the relevance of the specific requirements and the need to reflect progress and changes in the market.

The criteria for Copying and Graphic paper were adopted in 2011 and it should be possible to set stricter requirements two years later following Member States and NGOs requests in this regard and increase in the availability of certified fibres since 2010.

As reflected in comments from the UK (from March 2013), according to CEPI sustainability report (from 2010 data), 61.6 % wood virgin fibre used by the industry is certified (up from 56.6% in 2008) and 71.1 % of pulp delivered to paper and board mills is from certified forests and could be counted by the mills (up from 69% in 2009). It is reasonable to assume that these figures have gone up further in the last two years, given the substantial increase of certified forest area and certified chain-of-custody companies in that period.



According to the conclusions of the background document supporting the development of these criteria¹, roughly only 10% of the forests are certified as evidenced in the "Forest Products Annual Market Review 2011-2012 (UNECE-FAO)"². However, this figure can be misleading if it is not considered that it also includes non-productive forests. NGOs would like to stress that the same chart from the UNECE-FAO report also shows that more than 26% of the global roundwood production was from certified forests. The latter figure is more relevant when assessing market availability of certified wood. The most recent Review³ even sets this figure on 28, 3%. Almost half of this is produced in "Western Europe".

The level of forest certification in Western Europe is the highest in the world with 56.7% in 2012, as compared with 51.2% in 2011. Contrary to the conclusions of the background report, we consider an increase of 11% in only one year to be rather substantial. Also, in the last five years, in total there has been a growth from 335 to 430 ha, or almost 30%, of FSC and PEFC certified areas⁴.

PART B – BOARD Substrate

Taking into account all the above considerations, EEB and BEUC welcome that the proposed value the criterion for the origin of the fibres for the board substrate has been amended to increase the proportion of certified material to 70%

¹ <http://ec.europa.eu/environment/ecolabel/documents/Converted%20Paper%20Products%20-%20Background%20Report.pdf>

² http://www.unece.org/fileadmin/DAM/timber/publications/FPAMR_2012.pdf

³ <http://www.unece.org/fileadmin/DAM/timber/publications/FPAMR2013.pdf> (page 20).

⁴ PEFC areas have globally grown from 220 to 253 ha and FSC from about 115 to 183 million ha.