



EU ECOLABEL FOR ABSORBENT HYGIENE PRODUCTS

BEUC and EEB comments on the criteria proposal October 2013

Contact: **Blanca Morales** – environment@beuc.eu & blanca.morales@eeb.org

Ref.: X/2013/094 - 06/12/2013

BUREAU EUROPÉEN DES UNIONS DE CONSOMMATEURS AISBL | DER EUROPÄISCHE VERBRAUCHERVERBAND
Rue d'Arlon 80, B-1040 Brussels • Tel. +32 (0)2 743 15 90 • Fax +32 (0)2 740 28 02 • consumers@beuc.eu • www.beuc.eu
EC register for interest representatives: identification number 9505781573-45

EEB -EUROPEAN ENVIRONMENTAL BUREAU
Bd. de Waterloo 34, B-1000 Brussels • Tel. +32 (0)2 289 10 90 • Fax +32 (0)2 289 10 99 • info@eeb.org • www.eeb.org
EC register for interest representatives: identification number 06798511314-27



Summary

The European Commission is preparing a proposal establishing ecological criteria for the award of the EU Ecolabel Absorbent Hygiene Products¹. In this paper we provide comments to the requirements proposed, in addition to those provided on 30th of August².

NGOs call for the use of 100% organic cotton and 100% of pulp originating from certified sustainably managed forests. The requirements for fluff pulp should not be set at least below the criteria set for labelling by well-established certification schemes in the field of forestry.

In addition, with the aim of avoiding the use of hazardous chemicals for the environment and health we reiterate our call to use totally chlorine free bleaching processes, exclude fragrances and lotions and strengthen the requirements for super absorbent polymers.

¹ <http://susproc.jrc.ec.europa.eu/sanitaryproducts/stakeholders.html>

² <http://www.eeb.org/?LinkServID=1FCB3864-5056-B741-DB89031DB53F4AED&showMeta=0&aa>



Certified pulp

EEB and BEUC would like to reiterate its recommendation that the all EU Ecolabel products should set an ambition level of environmental excellence for sustainable sourcing aiming at 100% of the fibres originating from sustainable managed forests and AT LEAST not below the criteria set for labelling by well-established certification schemes in the field of forestry.

The JRC has proposed that only 25% of the fluff pulp originates from sustainable certified forests, based on lower availability of certified fluff pulp in the US, main provider of fluff pulp. Taking into account available certified fluff pulp in the EU, the JRC estimations conclude that in all around 27,6% of the fluff pulp available is certified and do not consider this as sufficient to justify an increase to 70%. EEB and BEUC disagree with this conclusion, as it seems to take the assumption that all manufacturers of hygiene absorbent products would apply to the EU Ecolabel. According to the EU Regulation, the criteria should apply to 10-20% of the products in the market. In this respect, if 10-20% of the products should be able to obtain 70% certified fluff pulp to be awarded the label, it would be sufficient to have 7% and 14% of certified fluff pulp in the market, which is well below the current 27, 6%.

Nevertheless, NGOs consider that it is needed to take decisions and set criteria with the primary aim of the EU Ecolabel, which is to label products of environmental excellence and to drive the market to innovate and greening manufacturing processes and consumer products.

In our research we have identified that there exist at least three well known³ baby diapers brands for which at least 70% of the fluff pulp originates from sustainable certified forests. It would harm the credibility of the EU Ecolabel to set requirements below what green manufacturers in the sector are already doing, and it would also send a wrong message to those that have made the effort to purchase sustainable fluff pulp.

These products are listed below:

- *MoltexOk*o from ONTEX⁴, which has the FSC Mixed Sources label.
- *BAMBO Nature* by Abena⁵, which has also the FSC Mixed Sources label and the Nordic Swan.
- *Delora* by RAD Medical GmbH (Germany) also uses FSC certified pulp⁶.

³ MoltexOk (ONTEX) and Bambo Nature are very well known brands by green consumers in Belgium. Either of both products are available in most bioshops but MoltexOk is offered by a big retailer for at least 4 years.

⁴ As ONTEX has not apply to the exemption enabling them to use 50% certified fibres, this means that at least they should use 70% certified: <http://shop.delhaize.be/Baby-and-Kids/Hygiene-and-Care/Diapers/Nappies-7C-Maxi-7C-Nr-4-7C-Eco/p/S2013022500201610000>

⁵ Similar to the above, Abena has not apply to the 50% exemption, meaning that they use at least 70% certified: <http://www.bambo-nature.com/bambo-and-the-environment.html>.

⁶ We have not been able to confirm whether the FSC label is in the packaging, but the following claim can be seen: "Wood pulp in the core from FSC certified renewable forestry". The manufacturer has the license to use both FSC Mixed sources (70%) and 100%.
http://www.babyridesafe.com/Delora_Eco_Mini_Diapers_p/dedm.htm



- *Attitude* in the US and Canada⁷. The Website says that the product contains 100% FSC Certified wood pulp in fluff, however we have not been able to find the FSC label in the packaging when searching pictures on the Internet.

Furthermore, availability of certified materials is growing fast, and for which production processes this is used depends on demand. The Ecolabel is meant to create and reward such demand.

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. We strongly recommend that the wording is align with the text proposed in Copying and Graphic Paper to strengthen the requirement and ensure that the remaining share of non-certified fluff pulp shall not originate from controversial sources.

In addition, we do not support the inclusion of the wording “PEFC endorsed schemes” under assessment and verification, as it is redundant given that PEFC is the Programme for Endorsement of Forest Certification. The Ecolabel Board has so far accepted that the certification schemes shall be FSC, PEFC or equivalent, and it should evaluate and determine based in documentation provided the equivalence of any other certification scheme compared to the FSC and PEFC⁸.

Organic cotton

EEB and BEUC deeply disagree with the current proposal to request 10% organic cotton. NGOs strongly call for 100% organic cotton.

In addition to environmental impacts of conventional cotton, there are concerns about residual pesticides in the cotton. AHPs are in closed contact with the human body and very sensitive areas of the skin with prolonged exposure. A “certified” absence of any form of pesticide is advisable from a toxicological point of view and for the understanding of the consumer.

Also from a market perspective it would be beneficial for the EU Ecolabel to have such requirement for absorbent hygiene products. As stated in earlier comments from EEB and BEUC, there is hardly any completion with textile grade cotton fibres for cotton used in non-woven.

This approach would allow the criterion to be aligned with the Nordic Swan criteria.

Bleaching

EEB and BEUC consider that non chlorine bleaching should be supported to avoid risk of presence of dioxins in the final product.

⁷ <http://www.mamanautrement.com/en/ecological-disposable-diapers/224-eco-friendly-attitude-diapers.html>

⁸ http://ec.europa.eu/environment/ecolabel/documents/usermanual_paper.pdf



Fragrances

EEB and BEUC welcome the exclusion of fragrances in products intended for infants, babies and children under the age of twelve. NGOs propose that the age be raised until eighteen following the definition of a child by the UN Convention on the Rights of the Child.

Furthermore, NGOs call for a total exclusion of fragrances in EU Ecolabelled AHPs as that will not affect the performance requirements of these products. While we highly welcome the exclusion of fragrances in baby diapers, we are strongly concerned that their use is still allowed in all types of feminine care pads, tampons and (potentially?) breast pads. Use of fragrances is not a performance requirement for such products and their use leads to unnecessary exposure for the consumer. There are sufficient environmental, health and market arguments to support NGOs request to avoid their use in Ecolabelled products.

If fragrances are allowed, at least the following fragrances should be excluded:

- Musks and nitromusks fragrances, based on environmental toxicity and health issues.
- Substances listed in the opinion on fragrance allergens from the Scientific Committee on Consumer Safety published in 2012⁹, a list of which were considered as of high concern in humans and is not covered by criterion 7 on hazardous substances.
- HICC, atranol and chloroatranol, if this fragrances can be used for hygiene absorbent products.

Marketing arguments

Attitudes and expectations by some consumers are shaped by new products developed by manufacturers and the way they advertise them. According to Women's Environmental Network, the disposables industry dedicated more than 14 million pounds to advertising its products in the UK in 2009. *The disposables industry reinforces notions that discretion and "freshness" are key, and that other is a problem, through the products they develop and the way they advertise them*". However, environmentally aware consumers tend to prefer use of products that are free of unnecessary and/or problematic substances. One claim often used in the Nordic Countries is "free from lotion" (diapers). Women familiar with the health problems posed by perfumes and fragrances would favour the use of free from fragrances and lotions sanitary products.

EEB and BEUC exchange with Danish largest retailer of fast moving consumer goods, COOP, about consumer interest in hygiene absorbent products with perfume and lotions, indicates that the consumer preference in Denmark is for products without perfume and lotions. Their reply is very clear: *We do have the products [baby diapers, feminine pads, tampons], but not with perfume and lotions, and if we have the sales are very little*¹⁰ (Male Teller Blume, Compliance Manager non-food

⁹ http://ec.europa.eu/health/scientific_committees/consumer_safety/docs/sccs_o_102.pdf

¹⁰ Reply from COOP DK on specific product types:

- Diapers: the only brand with lotion is some Pampers' diapers (lotion, but no perfume), this has been highly criticised by NGOs in DK. All other inclusive all Coop own brands is totally lotion and perfume free. Libero, being a very big manufacturer in in DK (brand) has no lotions/fragrance.
- Feminine hygiene: Coop do not have any product today with lotion/fragrance. NO lotions/fragrance in all private label. All markets leaders (Always and Libresse) are lotions/fragrance-free. There has been some products in COOP shops, but the customer do not have preference for this.



COOP Denmark). From their perspective including fragrances and lotions in these products is a no-go area, as the consumer would not support that in northern EU countries.

Environmental arguments

Fragrances have a high impact on Critical Dilution Value (an environmental indicator used for detergent products for instance). The use of fragrances and lotions, which do not contribute to the performance of these products, leads to unnecessary environmental burden, taking into account the amount of sanitary products that end up in waste.

Health arguments

Fragrances are very sensitizing substances and the use pattern of these products leads to prolonged exposure (as a minimum for hours at a time for several days each month) of very sensitive areas. Feminine care pads and tampons are intended for use on vaginal vulvar tissue, which is an area potentially more vulnerable to exposure to toxic chemicals and irritants than the rest of the body¹¹. Fragrances may contain dozens of chemical ingredients. Manufacturers do not disclose ingredients in the fragrance, but product-testing show that they may contain allergens, sensitizers, phthalates, neurotoxins and synthetic musks (which can also disrupt hormones). From a precautionary point of view restricting its use in Ecolabelled products is advisable. The current criteria would not even avoid the use of fragrances which have been identified of high concern in humans by the SCCS.

Use of fragrances in feminine care pads have raised concerns, also within the scientific community.

- The Royal College of Gynaecologists and Obstetricians from the UK, has pointed out to fragrances and preservatives as two of the most common relevant allergens¹².
- Additionally, the American College of Obstetrician and Gynaecologists recommends not to use fragranced tampons and pads, as well as feminine sprays and powders, to help prevent or clear up vulvar disorders¹³.
- In its report from November 2013 "Potential health effects of toxic chemicals in feminine care products"¹⁴, the NGO Women's voices for the Earth, lists fragrances as one group of chemicals of concern in feminine care products (along with dioxins and furans and pesticide residues for pads and tampons) and provides various scientific studies where fragrances are linked to contact dermatitis¹⁵.

¹¹ Farage, M and Maibach, HI. (2004) The vulvar epithelium differs from the skin: implications for cutaneous testing to address topical vulvar exposures. *Contact Dermatitis*. Vol. 51, pp: 201-209, 2004.

¹² Royal College of Obstetricians and Gynaecologists (2011) "The Management of Vulvar Skin Disorder. NHS Evidence" Green-top Guideline No. 58. <http://www.rcog.org.uk/files/rcog-0rp/GTG58Vulval22022011.pdf>

¹³ American College of Obstetricians and Gynaecologists (2011) Frequently Asked Questions: Disorders of the Vulva.FAQ088. July2013. <http://www.acog.org/~media/For%20Patients/faq088.pdf?dmc=1&ts=20131204T0924544167>

¹⁴ <http://www.womensvoices.org/wp-content/uploads/2013/11/Chem-Fatale-Report.pdf>

¹⁵ Larsen, WG (1979) Sanitary napkin dermatitis due to the perfume. *Archives of Dermatology*. Vol. 115, pp: 363. March 1979.

O'Gorman SM, Torgerson RR. (2013) Allergic contact dermatitis of the vulva. *Dermatitis*. Vol. 24, No.2, pp:64-72. March/April 2013.



- Concerns about problematic chemicals, including fragrances and preservatives, used in female sanitary products have also been raised by other NGOs such as Women's Environmental Network¹⁶.
- Already in 1979, Larsen reported a case of sanitary napkin dermatitis due to fragrances and made references to cases where allergic contact dermatitis to the perfume in feminine hygiene sprays had been reported. According to Larsen, the fragrance materials responsible for most allergies include cinnamic alcohol, hydroxycitronellal, cinnamaldehyde, eugenol and isoeugenol.
- O'Gorman and Torgerson (2013) have concluded that allergic contact dermatitis is a frequent finding in patients presenting vulvar symptoms and identify fragrances as one of the allergens of most importance, along with medicaments and preservatives.
- Also according to Nardelli & all (2011)¹⁷, together with preservative agents, fragrance components are the most important sensitizing culprits in cosmetic products, although the specific fragrance allergens causing allergic contact dermatitis are often not identified.
- Eason & all (1996)¹⁸ provide also references¹⁹ in their research of investigations where the possibility of allergy to the perfumes used in sanitary products is mentioned.
- Additionally, in its study *Environmental oestrogens, cosmetics and breast cancer*, Darbre (2006) points out to nitromusks and polycyclic musk fragrances founded in a wide variety of cosmetics, perfumes and laundry detergents, and describes that several possess oestrogenic activity²⁰.
- Different organisations have implemented policies to procure non perfumed products or have free from fragrances environment working places. For instance, the University Hospital in Freiburg Germany requests hand cleaners without fragrances to reduce skin allergies among staff²¹. The Canadian Centre for Occupational Health and Safety has a scent Free Program²².

¹⁶ Seeing Red: Sanitary protection and the environment

<http://www.wen.org.uk/general/seeing-red-sanitary-protection-and-the-environment/>

¹⁷ Nardelli A, Drieghe J, Claes L, Boey L, Goossens A. (2011) Fragrance allergens in 'specific' cosmetic Contact Dermatitis. 2011 Apr;64(4):212-9.

¹⁸ Eason, EL (1996) Contact dermatitis associated with the use of Always sanitary napkins. Canadian Medical Association Journal. Vol. 154. No.8, pp: 1173-1176. April 15, 1996.

¹⁹ Pincus SH: Vulvar dermatoses and pruritis vulvae. [review] Dermatol Clin 1992; 10: 297-308

Larsen WG: Sanitary napkin dermatitis due to the perfume. ArchbDermatol 1979; 115: 363

Sterry W, Schmoll M: Contact urticaria and dermatitis from self-adhesive pads. Contact Dermatitis 1985; 13: 284-285

Maiback HI, Dannaker CJ, Lahti A: Contact skin allergy. In Middleton E Jr, Reed CE, Ellis EF et al (eds): Allergy, Principles and Practice, 4th ed, Mosby, St Louis, 1993: 1605-1648

Wilkinson JD, Rycroft RJG: Contact dermatitis. In Champion RH, Burton JL, Ebling FJG (eds): Rook!Wilkinson/Ebling Textbook of Dermatology, 5th ed, Blackwell Scientific Publications,Oxford, England, 1992: 611-716

Ridley CM: The Vulva, Churchill Livingstone, Edinburgh, 1988

²⁰ Darbre P.D. (2006) *Environmental oestrogens, cosmetics and breast cancer* Best Practice & Research Clinical Endocrinology & Metabolism Vol. 20, No. 1, pp. 121-143, 2006 doi:10.1016/j.beem.2005.09.007 <http://www.sciencedirect.com>

²¹ <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC2840251/>

²² Canadian Centre for Occupational Health and Safety Scent Free Program http://www.ccohs.ca/oshanswers/hsprograms/scent_free.html



Lotions

Similar to fragrances, EEB and BEUC also call for an explicit exclusion of lotions from this product group, as they are not needed in AHPs (they are not a performance requirement). They can be used on an ad-hoc basis by parents when required (which is mainly occasional), avoiding thus exposure to unnecessary chemicals. The rationale for our position to exclude lotions in fragrances is based in the arguments outlined above, also considering that lotions may contain not only fragrances, but also preservatives and other problematic chemical ingredients not covered by criterion 7 on hazardous substances.

If lotions are to be allowed, it will be needed to supplement the criteria with requirements set in the proposal for a EU Ecolabel for rinse-off cosmetics, including all preservatives and endocrine disruptors excluded in criterion 3"a" from this draft decision (triclosan, parabens, formaldehyde, Octamethylcyclotetrasiloxane, Butylated Hydroxy Toluene , etc). Otherwise, it will harm the credibility of the scheme if such substances can be found in Ecolabelled products. Other criteria on biodegradability, critical dilution value, etc would be relevant as well and should be assessed. In addition to health, environmental and marketing related arguments supporting the exclusion of lotions, it is a pragmatic approach not to allow them or it would be needed to set additional criteria as indicated above.

NGOs would like to stress that it is unclear whether the Cosmetic Regulation would address fragrances or lotions used in absorbent hygiene products, but diapers may only be covered as an article according to REACH. If the bans and requirements of the Cosmetic Regulation do not apply to lotions used in Absorbent Hygiene Products, this makes it even more important not to accept fragrances or lotions.

Absorbent Polymers

EEB and BEUC would like to reiterate its demand to reduce the limit of residual monomers allowed from 1000 ppm to 400 ppm as proposed in former drafts and by the Nordic Swan. Experience from Nordic Swan proves that 400 ppm is achievable for manufacturers as indicated in comments from Denmark.

A review on Superabsorbent Polymer Materials by Mohammad J. Zohuriaan-Mehr and Kourosh Kabiri (2008)²³, describes that in SAP materials, particularly hygienic SAPs, the allowed safe level of the residual acrylic acid has dropped from over 1000 ppm to less than 300 ppm throughout the past two decades.

END

²³ Mohammad J. Zohuriaan-Mehr and Kourosh Kabiri (2008) Superabsorbent Polymer Materials: A Review Polymer Journal 17 (6), 2008, 451 477
http://www.researchgate.net/publication/242582443_Superabsorbent_Polymer_Materials_A_Review