

April 2008

European Tissue Symposium

Position on European-wide Tissue Eco-labels and on the scientific principles during the process of defining the criteria for the EU Flower

Introduction

ETS is the European Tissue Paper Industry Association. The members of ETS represent the majority of tissue paper producers throughout Europe and around 90% of the total European tissue production. ETS was founded in 1971 and is based in Brussels.

Summary

Eco-labelling schemes aim to provide clear criteria to the industry for channelling their efforts towards sustainable development, balancing environmental, social and economical criteria.

The criteria for the eco-labels and the processes used to define them need to be credible and easily understood. This requires that the schemes should be steered, evaluated and lead by experts who can identify outdated, incorrect or biased data.

In the current paper, the European tissue industry, as represented in ETS, explain their support to the Type III eco-labels (ISO 14025). Regarding the EU Flower label for tissue (a Type I eco-label ISO 14024), it is their opinion the label for tissue must meet high standards of transparency and scientific rigour. There can be no deviation from proven scientific parameters and review systems. In all cases, the best scientific data available at the time must be utilised; the schemes must be open to all interested parties.

Context

Eco-labelling entered mainstream environmental policy-making in the late seventies, first with national schemes such as the German Blue Angel programme, to be followed by the Nordic Swan (1989). In 1992 a European eco-labelling regulation, known as the EU Flower, was also adopted. The stated objective is to support sustainable development, balancing environmental, social and economical criteria.

Types of eco-labels

There are three types of eco-labels, each defined by ISO (International Standards Organisation).

- **Type I: ISO 14024**

This type of eco-label is one where the criteria are set by third parties (not the manufacturer). They are in theory based on life cycle¹ impacts and are typically based on pass/fail criteria. The one that has European application is the EU Flower.

The *strengths* of this type of label are the simplicity for consumers and public procurement agencies and the perceived independence of the criteria setting organisation.

The *weakness* is the lack of flexibility for new and changing products; the simplicity of the pass/fail may actually exclude environmental superior products and stifle innovation. There is also a risk that the criteria setting group may have a particular agenda which influences the result.

- **Type II : ISO 14021**

These are based on the manufacturers or retailers own declarations.

Well known amongst these are claims of "100% recycled" in relation to tissue/paper.

The *strengths* of these eco-labels are the flexibility and the variability of their claims.

Their *weaknesses* are that even though there are, in the EU, strict rules on what can and can not be said in environmental claims, key issues may be avoided.

- **Type III : ISO 14025**

These claims give quantitative details of the impact of the product based on its life cycle. Sometimes known as EPDs (Environmental Product Declarations), these labels are based on an independent review of the life cycle of the product. The data supplied by the manufacturing companies are also independently reviewed.

The most well known example in the paper industry is the Paper Profile. You can tell a Paper Profile meets the Type III requirements when the verifiers logo is included on the document.

The *benefits* of Type III as compared to the other types of eco-label are that it gives the consumers all the information they may require, and therefore is very transparent.

¹ Life cycle or life cycle analysis or assessment refers to a technique used to model the impact of a product from cradle to grave.

The *downside* of Type III is the lack of pass/fail criteria and hence it can be difficult for the public to understand and compare products.

ETS mainly supports the ISO Type III Eco-labels, as well as the international EPD-system (Environmental Product Declarations).

The EPD-system's aim is to help and support the industries in communicating the environmental performance of their products (goods and services) in a credible and understandable way.

The EU Flower for tissue

So far, the EU Flower for tissue has had limited success in the tissue industry. The concept has been accepted as a marketing tool by some tissue producers; others have found them not to be of value.

Whether or not the individual companies of the tissue industry utilise the EU Flower, all firmly believe that the development of criteria for any such labels should be based on an unbiased and transparent process.

This process should be credible and easily understood. The submission should be evaluated and modified by people who have the expertise to spot outdated, incorrect or biased information. The process should also utilise the best scientific data available at the time and be open to all interested parties.

This view is entirely in line with the relevant EU legislation.

Credible EU Flower for tissue: a scientific, not a political process

EU Flower must meet high standards of transparency and scientific rigour in terms of setting criteria for individual product groups. The process as defined by the European Commission is very complex, but transparent and based on tangible and proven scientific parameters.

The scientific rigour of the process should never be overturned so that the criteria setting process is transferred outside of the expert working group structure. The consequence and danger of this is that unrelated and outdated data, and potentially unscientific methods, might be introduced into the process.

The tissue industry, represented by its trade association ETS, cannot support actions by Commission officials that risk deviating from sound science in order to support one particular interest group's view on what is best for the environment.

Deciding the correct criteria for any product requires expertise both in regard to the environment and the product, and requires scientific working groups, led by well-known and respected scientific institutes, to review all the available information.

This should not be done, as is being attempted, by bypassing this review and utilising a political process to decide on complex scientific criteria.

Conclusion

For the EU Flower to retain any credibility its criteria should not be decided by a political process, but by the scientists and experts in the field, in this instance the group led by the well respected and knowledgeable **SIS Eco-labelling**.

The European Tissue Symposium, as a responsible organisation representing 90% of the European tissue industry, suggests that the processes be reviewed to eventually address any dilution of the EU Flower principles. ETS moreover offers any scientific assistance the European Commission might wish to use in reviewing the current status of the process.

For more information, please contact:

Roberto Berardi - tel. + 39 011 8128810 - roberto.berardi@europeantissue.com

www.europeantissue.com