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Position on carbon footprint labelling of toilet tissue

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.

As manufacturers of disposable products the tissue sector is committed to promoting sustainable development through its business activities and this includes reducing the carbon footprint of its products and operations wherever possible. This position paper summarises ETS's position on the carbon footprint labelling of toilet tissue.

Summary

In 2008, ETS decided to calculate the carbon footprints of European average toilet tissue. ETS also wanted to consider the advantages and drawbacks of communicating carbon footprints on pack. Expert consultants operating to ISO 14025 standards for life cycle analysis were commissioned to carry out the work. As there is currently no internationally accepted methodology for the calculation of carbon footprints, the consultants calculated the carbon footprints of industry average toilet tissue made with different types of fibres, using Life Cycle Assessment (LCA) methodology and the Confederation of European Paper Industries (CEPI) '10 toes' reporting framework. The results showed that a limited range of numbers could be used to represent the carbon footprint of all the toilet tissue produced in Europe. See: <http://www.europeantissue.com/wp-content/uploads/091126-Carbonfootprint-of-toilet-tissue12.3.2009.pdf> .

Having analysed the results, as well as the various methodologies for calculating carbon footprints across Europe, ETS decided that putting any kind of numbers on packs of toilet tissue would not be relevant and potentially misleading for consumers, because there is no consistent methodology or standards for calculating carbon across Europe.

However, the project was able to officially establish that the contribution of toilet paper, at around 22 grams of CO₂ per day towards a standard average person's daily carbon usage (typically 23.3 kg per day per head for the former EU 25 - see reference 1) is small and most importantly, in terms of hygiene benefits, cannot be easily replaced.

Context:

ETS is committed to the sustainable use of raw materials and supports the concept of a low carbon economy. In 2007/08, ETS contributed comments on the Carbon Trust's British Standards PAS 2050 for the measurement of carbon footprints and supported the development of the CEPI (Confederation of European Paper Industries) framework for reporting carbon in products – see: <http://www.europeantissue.com/wp-content/uploads/Carbon-Footprints-Framework-appendices.pdf> .

What is a carbon footprint?

Carbon footprinting is a subset of Life Cycle Analysis and is used to specifically understand the greenhouse gas emissions associated with the manufacture and use of a particular product. The carbon footprint is not just about the emissions of carbon dioxide but also includes the contribution of other greenhouse gases such as methane and nitrous oxide.

Life Cycle Assessment is an internationally recognized methodology, based on the ISO 14025 series of standards which is used to identify potential environmental impacts and improvement opportunities across raw material production, transportation, finished product manufacturing, consumer use and disposal. The international standard ISO 14025 recommends that industry sector guidelines, namely the Product Category Rules (PCR), should be used when calculating LCA's (which includes greenhouse gas emissions) for products.

It is important to note that there is currently no consistent methodology for calculating carbon footprints across Europe or globally. ETS members are concerned that labelling products with carbon numbers only takes into consideration one environmental impact in isolation, rather than looking at the whole environmental picture as with LCA. This could lead to anomalies, for example where a lower carbon footprint is accompanied by higher waste or water usage.

In September 2007 CEPI published a guidance document to help the paper industry report their carbon emissions. The CEPI framework is designed to allow comparisons and achieve consistency within the industry but still permitting flexibility. The framework split the analysis into 10 sections or 'toes' and covers carbon emissions/sequestration throughout the life cycle of paper products. Details of the CEPI framework are available on the ETS web site – see: <http://www.europeantissue.com/wp-content/uploads/Carbon-Footprints-Framework-appendices.pdf>.

ETS carbon footprint study of industry average toilet tissue:

A highly qualified European consultancy operating to the ISO 14025 standards for life cycle analysis, were commissioned to carry out the measurement of carbon emissions associated with the production of toilet tissue. They calculated the carbon footprints of the industry's average toilet tissue made with different fibres, using Life Cycle Assessment (LCA) methodology and the Confederation of European Paper Industries (CEPI) '10 toes' reporting framework. Packaging was excluded.

However, certain toes were not reported, in particular carbon sequestration (carbon storage/fixation) in the forests and the end-life for toilet tissue, owing to the difficulty in producing meaningful averages for these areas.

The results of the study have confirmed that a limited range of values could be used to represent the carbon footprints for all the toilet tissue produced in Europe, and that the type of external energy (fossil, nuclear, hydroelectric etc.) used in processing, is the largest contributing factor towards the industry's average carbon footprint.

ETS position on communicating the industry's average carbon footprint of toilet tissue on packs

ETS members believe that, despite having credible data, putting numbers for carbon emissions on packs does not currently provide relevant information or supports decision-making by the end consumer. Many stakeholders, including the EU and the European retail community agree that consumers need to be educated about the environmental impacts, including that of carbon footprints before labelling can be successful and relevant.

Reasons for not communicating industry average carbon numbers on packs

- There is no consistent methodology for calculating carbon footprints across Europe or globally. Different countries/organisations have preferred methodologies; for example France, Germany and the UK use different methods for measurement. Other variables include allowances made for sequestration of carbon in the products and the inclusion of packaging.

Until there is international agreement on carbon footprint methodologies, (including auditing standards), for example through publication as an International Organisation for Standards (ISO) method, then different numbers for the same product can be generated and communicated by using different methods. The same product sold

on a pan-European basis could carry different labels for different schemes which could be misleading and confusing for consumers.

- The data generated for a carbon footprint needs to be presented in a relevant way that the end user can understand. Environmental data is often expressed in the form of a functional unit, for example the amount of carbon dioxide that is generated by a car travelling 100 kilometres. The data from the ETS study was expressed as the amount (kg) of CO₂ equivalents per tonne of tissue. This type of functional unit does not help the end user in their purchasing decisions. Other functional units could include the carbon emissions per sheet, roll, or per pack. However, there are many different types of toilet tissue designed to meet a variety of consumer needs. Products can be 1 ply or even 6 ply. Normally, fewer sheets of a multi-ply product are required for cleaning than for a single ply product.

Therefore, ETS members favour a functional unit that describes the amount of carbon used in the daily consumption of toilet tissue. Usage habits are different between men and women. Therefore, the consumer could be faced with a variety of different labelling formats on packs which makes it difficult to compare.

- In the German Product Carbon Footprint programme, the retailers involved in this initiative publically stated that carbon footprint numbers are very difficult to communicate on packs and that the information generated needs to be interpreted carefully. This needs to be considered when communicating.
- Carbon footprints for the same product but made in different countries will have different results due to the national energy mix. Even within countries there can be local conditions that may affect the carbon footprint of the product.

Conclusion

Toilet tissue is an essential product for delivering personal hygiene and there are currently no realistic alternative products available. Toilet tissue exists in many different designs to ensure that the hygiene needs of consumers are met. To place a carbon footprint label on packs at this point in time would not provide relevant information for consumers at the point of purchase.

Finally, it should be remembered that the carbon emissions associated with the consumption of toilet tissue is only a small fraction of the carbon associated with many other common activities, for example:

The production of 10 kg of tissue paper, the average we each in Europe use every year (tissue paper includes toilet paper, kitchen rolls, facial tissues, paper hand towels), creates some 13 kg of CO₂ emissions. From these

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figures the share of toilet tissue is 6 kg and respectively 8 kg CO2 emissions, which nets out around 22 grams of CO2 per day. This is hardly comparable to many other small scale domestic daily activities, and is roughly equivalent to the CO2 produced by an average family car over a distance of only 140 metres. (Source: Outlook for world tissue business 10/2008 by Risi)

The Future

ETS therefore proposes that any future use of carbon footprint or other environmental labels on consumer products must:

- Be based on life-cycle thinking and sound-science; this means including other environmental impacts such as water and waste, not just carbon.
- Be based on truly global, harmonised and international standards such as the ISO 14040-series for LCA and the ISO 14025 for creating Product Category Rules. This will improve accuracy and reduce variability of the analysis.
- Result in credible and relevant information for consumers, customers and other stakeholders.

Reference 1: The World Resources Institute (2005) 'Navigating the Numbers, Greenhouse data and International Climate Policy' by Baumert, Herzog and Pershing, quotes that the EU 25 CO2 emissions per capita is 8.5 tonnes per year or 23.3 kg per day.

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