UMHVERFIS STOFNUN

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Public Consultation of proposal for generation 6 of Criteria for Nordic Ecolabelling of Printing companies and printed matter

We hereby invite you to comment on our proposal for criteria for Nordic Ecolabelling of Printing companies and printed matter. Your comments are important when the proposal is to be discussed and decided by the Icelandic and Nordic Ecolabelling Boards. We would like to receive your comments before **April 30th 2020.** Submit your comments to ust@ust.is. Your contact person in Iceland is steinunn.karlsdottir@umhverfisstofnun.is.

Major changes

- The requirement for consumption of inspected and Nordic Swan/EU Ecolabelled paper has been strengthened from at least 25% to 70%.
- New requirements for printing substrates other than paper. As for paper, substrates other than paper needs to be inspected in order to be available for the printing company in the electronic application aid.
- The requirement for energy use has been re-structured and stringed.
- **Chemical requirements:** The requirement for classification of production chemicals has been updated in relation to CLP and the general chemical requirements for The Nordic Swan Ecolabel. This means that several exemptions and trivial limits for specific chemical has been removed in generation 6 e.g.:
  - Toluene-based washing agents and printing ink and chemicals containing chrome trioxide and copper sulphate used in gravure printing. This means that it is not possible to use rotogravure printing in the new generation 6.
  - UV inks (energy-curable inks) used in inkjet machines. This means that there is limited opportunity to use UV inks in the new generation 6.

New requirements

- The chemical requirement has been restructured (no longer included in a matrix and point system) and replaced with absolute requirements for the individual chemical.

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- New requirements have been introduced for the definition of ingoing substances and impurities in chemical products, and the limit for impurities in the chemical product is 100 ppm.
- Printing inks, toners, inks, varnished and adhesives must be tested for de-inkability according to INGEDE[1] and have a positive score according to EPRC[2] De-inkability Scorecard.

Use of the Nordic Swan Ecolabel logo on printed matter:

- The requirement has been expanded with the possibility to use the logo on Nordic Swan- or EU Ecolabelled textile or Nordic Swan Ecolabelled construction and facade panels such as acoustic panels.

Most important issues

Nordic Ecolabelling would like to have comments on the complete criteria set, but would like to highlight the following points:

- A new definition of ingoing substances and impurities in chemical products has been introduced in requirement O10 and appendix 1. We would especially like your comments on how this might affect the approval of your products according to the new criteria.
- A new requirement for de-inkability of printing inks, toners, inks, varnishes and adhesives has been introduced. We appreciate to have your comments on the requirement itself but also on other possible test methods.

Who can submit comments?

We kindly ask you to spread the information about this consultation to anyone interested in the proposal.

Onward process

All comments will be examined and assessed at the end of the consultation period. Subsequently a revised proposal for criteria will be prepared. This proposal will be discussed by the Icelandic Ecolabelling Board and national Ecolabelling Boards in the other four Nordic countries. The final decision on the criteria is made by the Nordic Ecolabelling Board based on the opinions of the national boards. The material used for this process is, apart from a proposal for criteria, a compilation of all the public consultation comments together with the responses from Nordic Ecolabelling. This compilation will be published on our website www.svanurinn.is.

We are looking forward to receiving your comments before April 30th 2020.

[1] www.ingede.org

[2] ERPC (2017). Assessment of Printed Product Recyclability