



Kommissionens materiale til møde i Competent Body Forum om implementering af principper for EU miljømærkekriterier

Møde afholdt 20. juni 2017 i Bruxelles.

Punkt 10. a. på dagsordenen (iflg. dagsordensoplægget for mødet):

Printed Paper: Implementation of final criteria (by DK)

DE = Tyskland, DK = Danmark, FI = Finland, IT/Ispra = Italien, NO = Norge, UK = Storbritannien.

Referat. Udsendt af Kommissionen (EU Ecolabel helpdesk) 17. august 2017.

Question 1 – De-inking:

DE: We re-use tests on de-ink ability in different applications in case they come from the ink producer or when the printing authorised this.

FI : points out that while the criteria states that tests need to be carried out on each type of paper that a producer would like to certify, the user manual is less clear on the number of tests that need to be conducted on the products.

DE: reminds that additional tests need to be systematically conducted when there are different varnishes on the paper because the quality and coating can change the results. Due to the numerous products certified, it is costly and time-consuming to do a test for every similar product. Tests are preferably conducted on 'high risk' products (products that are composed differently from others that have already been tested) to ensure that resources are being used wisely. DE also believes that if the paper has a different binder or varnish than what has already been tested, then a new test needs to be done. However if the supplier of the pigment has changed, then it is not necessary to retest (as long as the previous tests show that the first pigment has been tested in the 'worst possible scenario'.

DK: wonders what would happen if there was a change to the ink? What if there is a change to the ink?

DE: it depends on the change, if we need a new test or not. We also consult with test institutes to make this decision.

IT/ISPRA: We ask for a new test unless they can prove the first test was performed in the worst condition.

Conclusion: Question 1 – De-inking

It is not necessary to test the final product when they work within a frame of approved inks and paper. Tests can be used in different applications when they who paid for the test approve this. If the paper has a different binder or varnish than what has already been tested, then a new test needs to be done. If the ink changes it is not always necessary to retest, only if the changes negatively impacts the result.

Question 2 – How to indicate trade names on ECAT

DK: reminds CBs that generic names for products used to be allowed on ECAT, however, as of 2014, it was decided that all trade names should be entered into ECAT as individual products.

DE: indicates that while they require for licence holders to exhaustively provide the name of all of their products' trade names in the Annex II of the contract, they are more lenient on how this information is presented on ECAT. Furthermore, there are practical reasons as to why this is not enforced on their licence holders: 1) A printing house does not want to publicly disclose on ECAT that they have a licence for confidentiality reasons. 2) Any printing house has numerous trade names, therefore it would be a laborious task to register them all in ECAT.

UK: agrees with DE and believes that there should be more flexibility in the requirements to input information onto ECAT. Furthermore, as trade names change frequently, it would be too time consuming for licence holders to update this information within the system.

IT/ISPRA: indicates that they would like to know if other CBs also request the additional information that the former policy officer, Carla Pinto, stipulated in 2014 from their licence holders, such as their list of consumables per product (this information was only requested for this product group).

NO: believes that there is a need to treat printing house as services because until the entire printing house is certified, it is not possible to validate each individual trade name (and consequently register each of them into ECAT). It is suggested to list the categories of products on the ECAT instead of the individual trade names.

ISPRA: highlights that this new leniency on how to enter information into ECAT will be difficult to justify to its licence holders, as common practice in IT was to enforce that each trade name was properly registered in ECAT.

Conclusion: Question 2 – How to indicate trade names on ECAT

Contracts will continue to be the official document with all listed trade names, however it is not necessary for licence holders to register all individual trade names in ECAT (general categories of products can be instead indicated).

DK and the EC will collaborate to propose an amendment for the UM during the November CB forum in order to make the stipulation on including each trade name for a licence in the ECAT more flexible.

Dagsordenoplæg fremsendt før møde d. 20. juni 2017.

Baggrundsmateriale til punktets behandling. Indsendt af Danmark.

10 a. DENMARK – Printed paper: Implementation of final criteria

A Danish governmental institution (hereafter the implementation institution) working with the *implementation* of EU law in Denmark reacts on claims regarding possible different (and stronger) implementation of EU regulations in Denmark compared to other Member States. This letter deals specifically with *EU Ecolabel criteria for printed paper*.

The implementation institution has instructed the Danish Environmental Protection Agency (Danish EPA) to do a check in two cases with regards to the criteria for printed matter. The Danish EPA finds it relevant to discuss this in the CB Forum, in order to ensure equal understanding and implementation of the criteria.

The two cases below have been taken up by the implementation institution, and references to any countries are also on behalf of this institution.

Case No. 1:

In Germany, it is accepted that generic tests are used as evidence of authorisations for the use of the EU Flower on printed matter. This means that a number of positive tests, which have already been completed by other printing companies with the same printing technology, can be used as evidence in other printed matter applications, without having to pay for new tests on identical raw materials and materials.

Danish EPA elaboration of the case: The case deals with recyclability of a printed matter, Criterion 3, and page 17 in the User's Manual.

'Generic tests' are not explicitly mentioned in the criteria or User's Manual, which refers to a 'reference case': *Testing must be performed on a final product representative of the worst case reference.*

In our understanding, Germany is in line with the test requirements described in the User's Manual. Ecolabelling Denmark has the same interpretation of the requirements and accepts in the same way other already completed test showing compliance with the criteria.

For an ink this means that 'de-inkability score «shall be poor or better, equal to '0' or above, and shall (usually) be performed on three types of paper: uncoated, coated and surface-sized paper. Recognition of a test also requires that the tests are available. Other Competent Bodies views are welcome here.

Case No. 2:

The EU central register, ECAT, shows products that have obtained the EU Ecolabel certification in Europe. It seems that German, Dutch, Finnish and Romanian licensees have obtained registration of their licence under very wide trade names, unlike in Denmark, where licences are assigned a specific print or title.

Danish EPA elaboration of the case: The case deals with what is addressed in Criterion 1 and in the User's Manual page 6.

The User's Manual specifies that an application for printed paper products can be made for:

A specific printed paper product identified by its trade name (e.g., magazine XXX) or A single category of products (e.g., magazines, brochures, books, newspapers). In this case, the category of products shall be identified as precisely as possible (e.g., magazines, glued, format X-Y, pages A-B).

This was agreed by the CB Forum in March 2013, and licence holders should be asked to change their trade names accordingly.

As Case No. 2 implies wide trade names do exist in ECAT. One case could be Finnish licence FI-28-003 to Erweko Oy with the trade name: *Sheetfed offset printed products*.

Another example could be Rumania licence No.: RO/028/002 for several wide trade names: *Ziare, reviste, cataloage, broşuri și flyere*

Even Denmark has also registered licences with wide trade names, e.g. licence DK/28/002 with the trade name: *Husstandsomdelte reklamer*.

The Danish EPA understands that ECAT is functioning in the way that it is the licence holder who is responsible for adding new information, changing trade names, etc.

Conclusion

The Danish EPA suggests that all licence holders are informed about the requirement in the User's Manual with regards to trade name.

Licence holders are given a 3-month time limit from the CB Forum meeting to make the relevant changes to ECAT.

Other Competent Bodies views are welcome here.