To consulting parties

Your ref.	Our ref.	Date
	2016082/1.1.3/AW/kk	January 9th 2017

Consultation – proposal on revised criteria for Nordic Swan Ecolabelling of disposables for food

Dear Sir/Madam,

Nordic Ecolabelling hereby gives you the opportunity to comment on the proposal for revised criteria for Disposables for food. The proposal for revised criteria and the background document for the suggested requirements are published on www.svanemerket.no/aktuelt/miljokrav/. The work with proposal for revised criteria has been done by the secretariats of Nordic Ecolabelling lead by Eline Olsborg Hansen at Nordic Ecolabelling Norway. Please contact the Norwegian secretariat if you want a paper copy of the documents and/or overview of the consultation bodies.

The most important changes in the revised criteria are:

- The product group definition has been updated with a reference to the EU Regulation 1169/2011 for definition of «prepacked» food.
- There are nominal limits for some requirements and less comprehensive requirements for individual packaging (e.g. paper around chop sticks) to make the documentation easier for materials that in total constitute a low percentage by weight of the product.
- The criteria suggest to allow labelling of products made of recycled plastic. Recycled pulp/paper/board is still forbidden.
- There are new reference values and requirement limits for energy, CO_2 and emissions to air and water for coffee filter, paperboard, kraft liner and fluting.
- There is a new requirement to ingoing substances in chemical products like adhesive and colourings used in the production (converting process) of the disposable article.
- There is a new requirement to residual monomers classified as carcinogenic, mutagenic and toxic to reproduction in plastic.
- The energy requirement to bio-based polymers can also be documented with a certification according to ISO 50001.
- The waste handling requirements are changed so that the requirements promote products that are possible to material recycle. The consequence of this is that it is not possible to label plastic products, including plastic products made of compostable/degradable plastic, that cannot be material recycled in today's waste handling systems. By this, Nordic Ecolabelling wants to contribute to the circular economy and considers this especially important in a product group generating a lot of waste.
- Nordic Ecolabelling still have a requirement stating that a high percentage of the product should be bio-based. For bio-based plastic Nordic Ecolabelling suggests not to approve the use of the mass balance method (mixing fossil and renewable raw materials). Nordic Ecolabelling considers it important with full traceability on the renewable raw materials so that the final product actually is bio-based.

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

- To allow recycled plastic
- The waste requirements
- The requirement to full traceability on the renewable raw materials in bio-based plastic

The contact person in Norway is Kristian Kruse, and comments can be sent using the reply form on our website, by mail or e-mail to post@svanemerket.no.

We look forward to receiving your comments no later than March 10th 2017. When the consultation has finished and the criteria documents have been adopted by the Nordic Ecolabelling Board a consultation compilation containing all comments, and Nordic Ecolabelling's comments to these, will be available at the Norwegian secretariat.

Yours sincerely,



Anita Winsnes
Managing director