To consulting parties

Your ref.	Our ref.	Date
	2017005/1.1.3/AW/kk	2017-02-07

Consultation – proposal on revised criteria for Nordic Swan Ecolabelling of liquid and gaseous fuels

Dear Sir/Madam,

Nordic Ecolabelling hereby gives you the opportunity to comment on the proposal for revised criteria for Liquid and gaseous fuels. 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 Thomas Christensen at Nordic Ecolabelling Denmark. Please contact the Norwegian secretariat if you want a paper copy of the documents and/or overview of the consultation bodies.

Biggest changes

- The most important changes in the revised criteria are focusing on harmonizing requirements and calculation of emissions of greenhouse gases in accordance with EU RED Directive (2009/28/ EC).
- Requirements for reducing greenhouse gases now only include the renewable proportion, and not as in today's criteria, the finished fuel (renewable + fossil share).
- Requirements for emissions of greenhouse gases have been tightened and the requirement is stricter compared to EU.
- Requirements to the share of first generation and advanced biofuels in the Nordic Swan Eco-labelled liquid or gaseous fuels have also been tightened.
- Requirements for raw materials have been updated according to Nordic Ecolabelling's new forest requirements and view on problematic feed stocks, such as palm oil and soybean oil.
- Requirement for harmful substances in exhaust gases have been removed, since the pollution is primarily related to engine design and not to the fuel itself.
- Because of the harmonization of requirements and calculations with EU RED (2009/28/EC), the requirement for energy use has been removed, as hydrogen is no longer covered by the criteria.

It is important to point out that the Nordic Ecolabelling is positive to the use of hydrogen for transport. However, the technology is still considered immature, with very limited distribution sites in the Nordic countries. Nordic Ecolabelling will continue to explore the possibility of involving hydrogen in the product group and closely follow the developments in the on-going review of EU RED Directive in relation to hydrogen production.

All changes and amendments to the requirements are listed in Chapter 8 in the background document. Further details regarding changes to the requirements as well as new requirements can be found in Chapter 7 in the background document.

Proposed changes:
We wish to highlight the following points:

- Requirements for the share of renewable raw materials in the Nordic Swan Ecolabelled fuel, including requirements for the share of first generation and advanced biofuels.
- Requirements for reduction of emissions of greenhouse gases from the renewable share in the Nordic Swan Ecolabelled fuel.
- General information for the new product types, liquid and gaseous fuels for sea and air transport as well as liquid fuels for heating and industrial use, including the quality requirements for the new product types.

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

We look forward to receiving your comments no later than 2017-04-04. 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