

Consultation response for

Office and hobby supplies



Generation 5 – 26.8.2024

Nordic Swan Ecolabelled Office and hobby supplies –
 Consultation response
 057/5, 26.8.2024

- 1 Summary 1**
- 2 About the consultation 2**
- 3 Compilation of received responses 3**
- 4 Comments to the criteria, in detail 4**
 - 4.1 General comments 4**
 - 4.2 Definition of the product group 8**
 - 4.2.1 What can carry the Nordic Swan Ecolabel?8
 - 4.3 Comments to the individual requirements..... 8**
 - 4.3.1 Chapter 1.1 Definitions8
 - 4.3.2 Chapter 1.2 Product description, refill and child safety8
 - 4.3.3 Chapter 1.3 Materials in office supplies in monomaterials9
 - 4.3.4 Chapter 1.4 Plastic and rubber9
 - 4.3.5 Chapter 1.5 Wood, bamboo, paper and cardboard14
 - 4.3.6 Chapter 1.6 Metal15
 - 4.3.7 Chapter 1.7 Chemical product.....15
 - 4.3.8 Chapter 1.8 Perfume and surface treatment19
 - 4.3.9 Chapter 1.9 Quality requirements20
 - 4.3.10 Chapter 1.10 Consumer information.....20
 - 4.3.11 Chapter 1.11 Packaging.....21
 - 4.3.12 Chapter 1.12 Licence maintenance23
 - 4.3.13 Appendices23
- 5 Comments to the background, in detail 23**
- 6 Discussion and conclusion 24**

1 Summary

The criteria focus on environmental and health requirements, i.e., by setting requirements for:

- Materials (type, recycled plastic, renewable, surface treatment, chemicals substances etc.)
- Chemical substances in ink, paint, glue etc.
- Quality of the products
- Packaging

The consultation for Office and hobby supplies was conducted in all the Nordic countries in the period 6th of March to 1st of May 2024.

A total of 9 consultation comments were received.

Most comments were given on requirements:

- Recycled plastic (O6)
- Test for harmful substances in recycled plastic (O7)
- Requirements for chemical products (e.g. ink, paint) (O17-O19)
- Design of packaging (O39)

O6 Recycled plastic

The comments were regarding that it may be difficult to get the needed amount of recycled plastic material.

Follow up after consultation:

After the consultation the requirement was change from a minimum of 60% of the plastic to be recycled to minimum 50%.

O7 Recycled plastics: Test for harmful substances

The comments were regarding the substances that must be tested for and that it may be difficult to live up to the limits.

Follow up after consultation:

After the consultation the requirement was change regarding the list of substances that must be tested for, the limits and the test methods. The updated requirement is based on the most common harmful substances found in PCR plastic, but also substances, limits and test methods from standard EN 71-3 and EN 71-9 for toys, packaging and waste packaging directive, REACH etc.

O17 Classification of the chemical product

O18 Classification of ingoing substances

O19 Prohibited substances

The comments were regarding the classifications compared to the exposure during use and comments on specific substances.

Follow up after consultation:

After the consultation the requirements O18 and O19 were change by dividing them into product types (one for hobby paint, glue, chalk, colored chalk and all products marketed to children, and one for writing instruments (except chalk and colored chalk), tape and erasers) where the group for writing instruments have some few classifications that must be fulfilled because of the exposure scenario during use.

O39 Design of packaging

The comments were regarding the 100% of recycled material, only monomaterial and labels.

Follow up after consultation:

After the consultation the requirement was change from a 100% of recycled material to 50% recycled plastic, that packaging components must be in monomaterial (instead of the entire packaging), that separation of material must be possible, that different materials must not be glued or welded together, that carbon black must not be used in plastic and allowance of PP or PE labels on PE or PP container. In addition, exception for the part of the packaging which holds paints or glues if the common recommendation from the authorities, where the products are to be sold, is that the packaging are not to be waste sorted for recycling. However, plastic must still be minimum 50% recycled.

2 About the consultation

The consultation for Office and hobby supplies was conducted in all the Nordic countries in the period 6th of March to 1st of May 2024.

A total of 9 consultation comments were received.

This document consists of feedback received during the public consultation for revised criteria for Office and hobby supplies, and Nordic Ecolabelling's response to the feedback. The purpose of this document is to show how external feedback has affected the development of the criteria in compliance with the ISO 14024 standard.

The main changes proposed in the consultation were as follows:

- **Product group definition:** Office supplies in monomaterials (e.g. ruler) have been included in the criteria.
- **Refill:** The requirement has been changed for pens (O2).
- **Recycled and bio-based plastics:**
 - Requirements (O6) for the minimum proportion of recycled content have been tightened from 30% by weight to 60% by weight.
 - New requirement for testing for harmful substances in recycled plastic (O7).
 - New requirement for raw materials for bio-based polymers (O8).
- **Wood, bamboo, paper and cardboard:**
 - Requirements for traceability and certified forestry have been updated (O11-O12).
- **Chemical products:**
 - Forbidden classifications have been updated (O17-O18).
 - The list of prohibited substances has been updated (O19).
- **Quality:**
 - Requirements for writing length have been tightened for most types of ballpoint and rollerball pens (O26).
 - New requirement for shelf life for marking pens, felt-tip pens and whiteboard pens (O27-O28).

- New requirement that leads do not break when sharpening pencils and coloured pencils (O29-O30).
- **Consumer information:**
 - New requirement that marking pens and felt-tip pens (incl. whiteboard pens) shall state on the products that they must be stored horizontally (O36).
- **Packaging:**
 - New requirement that the primary packaging must be of monomaterial and either 100% recycled or bio-based. In addition, a new requirement that labels on plastic packaging must consist of the same type of polymer as the packaging. (O39).
 - New requirement that the packaging must be marked with pictograms for recycling according to the national pictogram system (O40).

3 Compilation of received responses

A total of 9 responded, of these 1 only comment, 2 supports the proposal, 3 supports the proposal with comments and 3 oppose the proposal.

Table 1: Compilation of received responses

Country	A. Only comments	B. Supports the proposal	C. Supports the proposal with comments	D. Refrain from commenting	E. Rejects the proposal with justification	Totally
Denmark	0	1	1	0	0	2
Sweden	0	1	2	0	3	6
Finland	1	0	0	0	0	1
Norway	0	0	0	0	0	0
Iceland	0	0	0	0	0	0
Totally	1	2	3	0	3	9

Table 2: Danish consultation responses

Consultation body	A. Only comments	B. Supports the proposal	C. Supports the proposal with comments	D. Refrain from commenting	E. Rejects the proposal with justification
Penol a/s		x			
Danmarks Farve- og Limindustri			x		
Σ Danish responses:	0	1	1	0	0

Table 3: Swedish consultation responses

Consultation body	A. Only comments	B. Supports the proposal	C. Supports the proposal with comments	D. Refrain from commenting	E. Rejects the proposal with justification
BIC Nordic AB			x		
Havo b.v.					x
Henkel Norden AB					x
Pilot Corporation of europe					x
Upphandlingsmyndigheten			x		
Svensk Dagligvaruhandel		x			
Σ Swedish responses:	0	1	2	0	3

Table 4: Finnish consultation responses

Consultation body	A. Only comments	B. Supports the proposal	C. Supports the proposal with comments	D. Refrain from commenting	E. Rejects the proposal with justification
Feedback OY	1	0	0	0	0
Σ Finnish responses:	1	0	0	0	0

Table 5: Norwegian consultation responses

Consultation body	A. Only comments	B. Supports the proposal	C. Supports the proposal with comments	D. Refrain from commenting	E. Rejects the proposal with justification
Σ Norwegian responses:	0	0	0	0	0

4 Comments to the criteria, in detail

The various comments from the consultation parties have been inserted below and grouped in relation to the specific requirement numbers in the consultation draft of the criteria. Nordic Ecolabelling has given a response to the comments and described if the requirement has been adjusted.

4.1 General comments

BIC Nordic AB

Över lag anser vi att riktlinjerna utgör ett bra ramverk för vad skrivbordsprodukter på vår marknad bör följa. Då vi förstår att målsättningen är att fler ska söka Svanen och inte se att det är ett för stort kliv att bli certifierade så rekommenderar vi följande övergripande justeringar:

- Separera kraven mellan produkter som riktar sig till barn och de som utgör vanligt kontorsmaterial.
- återvunnet material både i produkt och förpackning är något som finns stor efterfrågan i världen vilket gör att insamling på många kontinenter måste bli mycket bättre för att säkerställa leverans av de volymer som vi med många

andra kräver. Detta skapar ett hinder som i sin tur inte bidrar till den globala förflyttningen av återvinning och miljömärkning.

- Lägg in ett tydligt avsnitt om sekretessavtal
- Tydlig gör den procentuella fördelningen av återvunnetmaterial vilka komponenter ska räknas in i vikten etc

Comments from Nordic Ecolabelling

Thank you for your input.

Most of the requirements are not divided into products for children and others products, but it should be clear in the requirements if there are stricter requirements for products for children.

After the consultation the requirement for recycled plastic in products is lowered from 60% to 50%, and for packaging from 100% to 50%.

Confidentiality is always the case when applying for the Nordic Swan Ecolabel, but when you apply you can always ask for and get a confidentiality agreement in addition if you want.

The text regarding amount of recycled plastic has been change a little after the consultation to make I more clear.

Penol a/s

Vi hos Penol a/s har vi gennemgået de nye foreslåede nye kriterier, og vi har følgende betragtninger.

Penol a/s har, som allerede eksisterende bruger og licensholder af Svanemærket ikke nogen anledning til at foreslå ændringsforslag til de foreslåede ændringer.

Alle punkterne falder godt i tråd med vores oplevelse af både vores kundebase samt hvad forbrugerne forventer at Svanemærkede produkter.

Comments from Nordic Ecolabelling

Thank you for your input.

We are happy that the criteria are in line with your expectations.

Havo b.v.

I oppose the proposal, see my comments below. My resistance is mainly based on the unrealistic criterium that recycled plastic must not contain the following substances (O7).

Find below my remarks. Hopefully they will help to improve the criteria and stimulate more suppliers to acquire a Nordic ecolabel.

If you need more info, or have questions feel free to contact me.

Comments from Nordic Ecolabelling

Thank you for your input.

We have changed the requirement for harmful substances in recycled plastic, please see more information under O7.

Upphandlingsmyndigheten

Inledning

Upphandlingsmyndigheten yttrar sig utifrån uppdraget att utveckla och stödja den upphandling som genomförs av upphandlande myndigheter och enheter samt att stödja de leverantörer som deltar i sådan upphandling.

Upphandlingsmyndigheten stödjer det reviderade förslaget av kriterier för Kontors- och hobbyartiklar. Kriterierna begränsar miljö- och hälsofarliga ämnen samt ställer krav på förpackningar, vilket är relevant ur ett hållbarhetsperspektiv.

Generella kommentarer

Det är möjligt att hänvisa till en viss märkning enligt 9 kap. 12-15 §§ lag (2016:1145) om offentlig upphandling (LOU). Detta får göras om:

1. kraven för märkningen endast rör kriterier som har anknytning till det som ska anskaffas,
2. kraven för märkningen är lämpliga för att definiera egenskaperna hos den vara, tjänst eller byggtjänst som ska anskaffas,
3. kraven för märkningen grundas på objektivt kontrollerbara och icke-diskriminerande kriterier,
4. märkningen har antagits genom ett öppet och transparent förfarande i vilket samtliga berörda kan delta,
5. märkningen är tillgänglig för alla berörda, och
6. kraven för märkningen har fastställts av ett organ som den som ansöker om märkningen inte har ett avgörande inflytande över.

Nordisk Miljömärkning kan gå igenom miljömärkningskriterierna som ingår i den aktuella märkningen för att säkerställa att de uppfyller förutsättningarna. Det kan underlätta för upphandlande myndigheter, såsom kommuner eller regioner, att använda märkning vid upphandling.

I detta remissvar gör Upphandlingsmyndigheten en bedömning av Nordisk Miljömärknings kriterier för kontors- och hobbyartiklar. Märkningar som kriterierna ställer krav på, som Bonsucro, FSC och PEFC har i samband med detta remissvar inte bedömts som märkningar eller i sig om de kan användas som krav på märkning i en upphandling. Upphandlingsmyndigheten vill dock framhålla att det inte nödvändigtvis är så att samma bedömningar kan göras kring eventuella andra märkningar som ingår i en märkning som ska kunna användas vid upphandling.

Några av kravtexterna i kriterierna för kontors- och hobbyartiklar innehåller formuleringar som kan försvåra upphandlande organisationers möjlighet att hänvisa direkt till specifika kriterier i Svanen för kontors- och hobbyartiklar i sina upphandlingar. Några av dessa är (exempel på krav inom parentes):

- Hänvisningar till andra krav (O18, O22, O24)
- Krav på dokumentation i kravtext (O7, O19)
- Hänvisning till "den Svanenmärkta produkten" i kravtext (O12, O14, O31)
- Utvärdering kommer att göras av Nordisk miljömärkning från fall till fall (O9, O19)
- Eventuella kommande ändringar i kravet anges i kravtexten (O22)

Kravspecifika kommentarer

Upphandlingsmyndigheten kommenterar nedan vissa krav som ur något perspektiv föreslås justeras eller på annat sätt förtydligas.

Comments from Nordic Ecolabelling

Thank you for your input.

Regarding requirement texts that may make it difficult for procuring organisations to refer directly to specific requirements: We understand that this may give some problems. Some of the issues may be possible to have focused on and solve in the

future, but others will be difficult to fit exactly for procuring organisations as many considerations must be implemented in the criteria such as e.g., possibility to act in case of changed classification of substances, that the criteria should be as easy to overview as possible, etc.

Svensk Dagligvaruhandel

Svensk Dagligvaruhandel stöttar Svanens miljömärkningar generellt och specifikt de uppdateringar som föreslås kopplat till kosmetiska produkter och kontors- och hobbyartiklar. Vi anser att det är positivt att märkningen bedöms utifrån ett livscykelperspektiv där både innehåll och förpackning beaktas. Svanenmärkningens högt ställda miljö- och hälsokrav är viktiga för dagligvaruhandeln, inklusive märkningens strävan mot mer hållbara val för konsumenterna. Det går i linje med de hållbarhetsambitioner som Svensk Dagligvaruhandel arbetar för. hetsambitioner som Svensk Dagligvaruhandel arbetar för. k Dagligvaruhandel arbetar för.

Svensk Dagligvaruhandel har inga övriga synpunkter på remissen.

Comments from Nordic Ecolabelling

Thank you for your input and support.

Danmarks Farve- og Limindustri

Tak for muligheden for at kommentere på den nye generation af kriterier. På vegne af foreningen og vores medlem Schjerning Farver A/S har vi en række kommentarer og spørgsmål, særligt vedr. recirkuleret plast og emballager, vi gerne vil fremsætte.

Comments from Nordic Ecolabelling

Thank you for your input.

Please see under the requirements below that you have commented on.

Feedback OY

Our product is such a simple monomaterial product that we couldn't find much to comment on. We would ask you to pay attention to one thing in the section "Packaging: New requirement that the primary packaging must be mono-material and either 100% recycled or bio-based".

(Nordic Ecolabelling: The above is google translated from the original text in Finnish which is: " Tuotteemme on niin yksinkertainen monomateriaalituote että emme löytäneet suuremmin kommentoitavaa. Yhteen asiaan pyytäisimme kiinnittämään huomiota kohdassa "Pakkaukset: Uusi vaatimus, että primääripakkauksen tulee olla monomateriaalia ja joko 100 % kierrätettyä tai biopohjaista".)

Comments from Nordic Ecolabelling

Thank you for your input.

Please see information under requirement O39 Design of packaging.

4.2 Definition of the product group

4.2.1 What can carry the Nordic Swan Ecolabel?

Havo b.v.

Of course I regret to read that playing clay for arts are not approved for being in scope. To my opinion this is a missed chance as the world of using clay for hobby is increasing and criteria could be easily incorporated in 057.

Havo did get questions last years from school suppliers in the Nordic regions that have tenders asking for Ecolabel certified clay.

Comments from Nordic Ecolabelling

Thank you for your input.

We are happy for the interest of getting playing clay Nordic Swan Ecolabelled.

However, at this point we do not have resources to expand the product group with playing clay as it consists of a completely different material than the other product types in the criteria. It will therefore take many resources to develop requirements that fit playing clay, resources that we currently unfortunately do not have.

4.3 Comments to the individual requirements

4.3.1 Chapter 1.1 Definitions

Danmarks Farve- og Limindustri

Indledningsvist har vi et spørgsmål angående definitionen på primær emballage (Primary packaging). Vi ved godt, at den ikke er ny, men ikke desto mindre er den vanskelig helt at forstå.

Det fremgår af definitionen af primær emballage, at beholderen (container), den kemiske blanding ("ink or glue") opbevares i, ikke skal betragtes som emballage, men som en del af produktet. Vi går ud fra, at det er nogle bestemte beholdere, man tænker på her. Det ville være rart, hvis det fremstod lidt tydeligere. te beholdere, man tænker på her. Det ville være rart, hvis det fremstod lidt tydeligere.

Comments from Nordic Ecolabelling

Thank you for your input.

We agree that the definition of primary packaging could be clearer. We have therefore changed the part regarding container etc. to the following:

"The container which holds e.g. glue in a glue stick or ink in a pen, as well as the application part for e.g. tape, is not considered to be packaging, but to be a part of the product.

The container for paint and liquid glue are considered packaging. However, if the paint or liquid glue are in a pen-like device, designed to apply the paint or glue during use, then it is not considered to be packaging, but to be a part of the product".

4.3.2 Chapter 1.2 Product description, refill and child safety

O1 Product description

No comments in the consultation.

O2 Refill

BIC Nordic AB

Maybe add gel pen as well.

Comments from Nordic Ecolabelling

Thank you for your input.

By mistake rollerball pens with ink or gel were not included in the consultation draft, they are now added.

O3 Child safety

BIC Nordic AB

BIC children products follow the EU Toy Safety Directive and have the CE marking.

Ball pens are not toys so there are not concerned by these requirements.

Comments from Nordic Ecolabelling

Thank you for your input.

It is correct that only products that are marketed as products for children or defined as toys according to the toy directive.

4.3.3 Chapter 1.3 Materials in office supplies in monomaterials

O4 Permitted materials

No comments in the consultation.

4.3.4 Chapter 1.4 Plastic and rubber

O5 Plastic types

No comments in the consultation.

O6 Recycled plastic

Havo b.v.

“At least 60% by weight* of the plastic materials must be recycled**. Recycled plastic from facilities that are EFSA*** or FDA*** approved for food contact or marketed as compatible with this may not be used.”

As paint is filled in transparent PE bottles and tubes (having one label for all colours) changing to higher PCR % would lead to grey / non transparent plastic packaging. Full transparent recycled LDPE is not possible yet. The other way would be to use one label for every color leading to more waste and unrealistic higher costs as artist products have low volumes. Realistic is currently 30% (EU target is 35% in 2030 and 65% in 2040 - PPWR).

Comments from Nordic Ecolabelling

Thank you for your input.

The container for paint is considered packaging in the proposed criteria and is therefore covered by the section for packaging in the criteria. Please see more information below under section 4.3.11.

After the consultation the requirement for recycled plastic in the product has been changed from min. 60% to min. 50%.

BIC Nordic AB

Response to: Plastic materials that comprise more than 5% by weight in the product must meet the requirement.

SD- How is the interpretation of the 5% by weight done? We understand that if there's at least 5% of the total product that is plastics, thus should be 60% recycled material. And not that each components that weight more than 5% must be recycled material.

Response to: Recycled plastic from facilities that are EFSA*** or FDA*** approved for food contact or marketed as compatible with this may not be used.

SD - What is the reasoning of taking out EFSA / FDA approved recycled material? Is this in order to not create competition with the food industry? Please help us understand

Comments from Nordic Ecolabelling

Thank you for your input.

The requirement applies when a product contains more than 5% by weight of plastic. After the consultation the requirement for recycled plastic in the product has been changed from min. 60% to min. 50%. If e.g. a pen weighs 50g in total and 5g of this is plastic (the products contain 10% plastic) then at least 50% of the 5g plastic in the product must be recycled.

*Recycled plastic from facilities that are EFSA*** or FDA*** approved for food contact may not be used because this plastic requires the highest traceability and purity of the plastic raw material, and it would therefore be down-cycling to use this plastic for anything other than food contact products. In the background document the background to each requirement can be read.*

Upphandlingsmyndigheten

Produkter som marknadsförs till barn är undantagna från kravet på innehåll av återvunnen plast. Undantaget borde innebära att produkter som marknadsförs till barn inte behöver uppfylla kravet, men eftersom det inte är ett förbud mot återvunnen plast i produkter som marknadsförs till barn kan det innebära att dessa produkter innehåller återvunnen plast.

I Svanens kriterier för leksaker, krav O17, finns specifika krav som återvunnen plast i leksaker måste uppfylla. Upphandlingsmyndigheten föreslår att detta krav används även för kontors- och hobbyartiklar som marknadsförs till barn, alternativt att undantaget i kravet ändras till ett förbud mot återvunnen plast i produkter som marknadsförs till barn.

Comments from Nordic Ecolabelling

Thank you for your input.

We have not applied the same requirements regarding the source of recycled plastic as we have in our criteria for toys, because they are very strict, and the exposure risk is lower in this product group. However, we have in the requirement for testing for

harmful substances in recycled plastic tightened the requirements for products marketed for children.

Danmarks Farve- og Limindustri

Vi formoder, at den plast, der er tale om under O6, ikke vedrører emballage, men f.eks. kuglepenne, tapeholdere, limstifter osv. Vi hører gerne, hvis vi tager fejl.

Comments from Nordic Ecolabelling

Thank you for your input.

Yes, that is correct. We have updated the definition of primary packaging to make it clearer what is considered part of the product and what is considered to be packaging.

O7 Recycled plastics: Test for harmful substances

Havo b.v.

“Recycled plastics must not contain the following substances above the limits specified in the table below.”

I checked this with one of our suppliers of PCR plastic buckets. They replied that the limits “are very strict and simply cannot be achieved ”

Please contact large PCR granulate suppliers on what they can achieve.

Comments from Nordic Ecolabelling

Thank you for your input.

After the consultation we have changed the list of substances that must be tested for, the limits and the test methods. The updated requirement is based on the most common harmful substances found in PCR plastic, but also substances, limits and test methods from standard EN 71-3 and EN 71-9 for toys, packaging and waste packaging directive, REACH etc.

BIC Nordic AB

General response to the requirement:

The test method of the Nordic Swan requirement is from the textile industry.

Is there a reason?

Why not to use the tests from the Toy Safety Directive: EN71-3 for example?

Is it possible to propose to accept other test method such as the one for the Toy Safety Directive?

Tests usually performed for recycled plastic for writing instruments:

EN71-3 (8HM) 1995

Total Lead/Cadmium: REACH restriction entries 63&23

Phthalates: REACH restriction entries 51 and 52

PAH: REACH restriction entry 50 (8PAH)

Flame retardants: REACH restriction entry 45 & POP 850/2004

Organotin compound content: REACH restriction entry 20

It could be interesting to propose to have organotin tested for recycled plastic. REACH restriction entry 20.

Response to test method for metals:

FY it is not the test method that BIC is using during qualification process. The test used is from the Toy Safety Directive.

Oeko-Tex is a test method for textile and linked to perspiration, that is not relevant for the writing instrument usage exposure.

For toys and writing instruments, heavy metal released testing are done : same as NF 400 (EN71-3 8HM 1995)

Response to limits for metals:

Limits from EN71-3 (8HM) for writing instruments (in ppm):

Sb: 60

As: 25

Ba: 1000

Cd: 75

Cr: 60

Pb: 90

Hg: 60

Se: 500

Response to limits for phthalates:

Limits for writing instruments:

Sum: DBP + BBP + DEHP < 0.1%

Sum: DnOP + DINP + DIDP < 0.1%

DiBP < 0.1%

DnHP < 0.1%

DnPP < 0.1%

DCHP < 0.1%

Response to limits for PAHs:

PAHs controlled for writing instruments at a limit of 0,5ppm:

Benzo(a)anthracène (BaA)

Chrysène (CHR)

Benzo(b)fluoranthène (BbFA)

Benzo(k)fluoranthène (BkFA)

Benzo(j)fluoranthène (BjFA)

Benzo(e)pyrène (BeP)

Benzo(a)pyrène (BaP)

Dibenzo(a,h)anthracène (DBA_hA)

Response to flame retardants:

First group:

Operating conditions:

- Solvent extraction
- Determination by GC-MS
- Internal method based on ISO 17881-1

Sum of Tetrabromodiphenyl ether (TetraBDE) +Penta-bromodiphenyl ether (PentaBDE) +Hexabromo diphenyl ethers (HexaBDE) +Heptabromo diphenyl ethers (HepaBDE) +Decabromodiphenyl

Comments from Nordic Ecolabelling

Thank you for your input.

After the consultation we have changed the list of substances that must be tested for, the limits and the test methods. The updated requirement is based on the most common harmful substances found in PCR plastic, but also substances, limits and test methods from standard EN 71-3 and EN 71-9 for toys, packaging and waste packaging directive, REACH etc.

O8 Bio-based plastics: Raw materials to bio-based polymers

Havo b.v.

I contacted our supplier. They use molasses (residual product) from sugar production from sugar cane. They mentioned that stating "Traceability must at least be ensured by mass balance" could be difficult because the formal way is to have both Braskem as FKUR as HAVO ISSC plus certified which is very costly. They mentioned that mass balance in general originates in the world of PP not in PE from sugar cane (as this can be proven by C14 methods easily.

Comments from Nordic Ecolabelling

Thank you for your input.

The traceability is very important to ensure that the raw materials do live up to requirements regarding avoiding severe negative impact at the place of cultivation, such as e.g. deforestation. This cannot be proved by a C14 test.

O9 Additives in plastic and rubber

BIC Nordic AB

Response to bisphenols:

Need to specify the list of substances, for example according to the REACH restriction. Idem for bisphenol..etc

Response to Aziridine and polyaziridines:

Need to specify the list of CAS numbers, investigation and testing.

Response to Carbon Black in office supply in monomaterial:

how can a monomaterial contain other substances? In that case, it is not anymore a monomaterial.

Comments from Nordic Ecolabelling

Thank you for your input.

Unfortunately, it is not possible to add CAS No. in the cases where the requirement covers substances groups, because no Cas number(s) will cover all the substances.

Regarding carbon Black we have made it more clear in the text that this applies for the product type "Office supply in monomaterial".

Pilot Corporation of europe

Thank you for providing us with the opportunity to comment on the proposed criteria. We have several requests regarding it: Regarding the ban on bisphenol: Bisphenol A is one of the components of polycarbonate plastic, so inevitably, there are traces of bisphenol in this plastic. By implementing this criterion, you would effectively ban the use of polycarbonate in the product. However, this plastic provides hardness and durability to the product. A more durable product that is then rechargeable will have a better impact on the environment than a product that breaks. Therefore, we do not understand your position on the complete ban of bisphenols and propose instead to have a quantity limit.

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Comments from Nordic Ecolabelling

Thank you for your input.

The requirement concerns additives added to the masterbatch or compound.

Substances originating from the polymer production itself are therefore not covered by this requirement. This means that any residual of bisphenol from the polycarbonate polymer production is not covered by this requirement.

After the consultation a new requirement for testing of migration of bisphenol A, B and F from polycarbonate plastic has been added.

O10 Rubber**BIC Nordic AB**

Response to table:

Please refer to the upper table regarding the list of PAHs tested during the safety qualification.

That is different from the Germany GS-mark testing. Testing is required.

Comments from Nordic Ecolabelling

Thank you for your input.

The list of PAHs has been updated after the consultation and is in line with GS-mark.

4.3.5 Chapter 1.5 Wood, bamboo, paper and cardboard**O11 Wood species that may not be used**

No comments in the consultation.

O12 Traceability and certification

Upphandlingsmyndigheten

Kravet hänvisar till leksaksprodukter i stället för kontors-och hobbyprodukter.

Comments from Nordic Ecolabelling

Thank you for your input.

We have now corrected this.

O13 Chemicals in recycled/recycled parts

No comments in the consultation.

4.3.6 Chapter 1.6 Metal

O14 Product parts in metal

No comments in the consultation.

O15 Heavy metals

No comments in the consultation.

4.3.7 Chapter 1.7 Chemical product

BIC Nordic AB

Response to that varnish and foils are described as chemical products:

Varnish and foil, don't fall under chemicals. They are put on a support and there is evaporation of solvent during the usage, in consequence the remaining substances are different after usage than the recipe of the product before application on the product.

We recommend to have them removed from this requirement. They are articles under REACH.

Comments from Nordic Ecolabelling

Thank you for your input.

Foils have now been moved from the chapter for chemical product to the chapter for plastic and rubber. We have deleted varnish from the chapter for chemical product because varnish usually is most relevant under the requirement for surface treatment.

O16 Overview of chemicals

No comments in the consultation.

O17 Classification of the chemical product

BIC Nordic AB

General response to the requirement:

In view of the exposure to the ink, to ban the whole list of classification is extreme.

The quantity of ink is below 1g and exposure to the skin is few microgram during normal use of a pen.

Please find the hazard that we recommend to remove, as they would be not relevant in view of the exposure during normal use.

Response to table and Hazardous to aquatic environment:

CLP regulation 1272/2008:		
Hazard class	Hazard class and category	Hazard code
Hazardous to aquatic environment	Aquatic-Acute-1	H400
	Aquatic-Chronic-1	H410
	Aquatic-Chronic-2	H411
	Aquatic-Chronic-3	H412
	Aquatic-Chronic-4	H413

Quantities of inks are negligible thus the environmental impacts would be insignificant

Response to table and Acute toxicity:

Acute toxicity	Acute Tox. 1 or 2	H300
	Acute Tox. 1 or 2	H310
	Acute Tox. 1 or 2	H330
	Acute Tox. 3	H301
	Acute Tox. 3	H311
	Acute Tox. 3	H331
	Acute Tox. 4	H302
	Acute Tox. 4	H312
	Acute Tox. 4	H332

Response to table and Aspiration hazard:

Corrosive / irritating to the skin	Skin Corr. 1A, 1B or 1C	H314
	Skin Irritation-2	H315
Aspiration hazard	Asp. Tox.-1	H304
Respiratory or skin sensitisation	Resp. Sens. 1, 1A or 1B	H334
	Skin Sens.-1, 1A or 1B	H317
Serious eye damage / eye irritation	Eye Dam.-1	H318
	Skin Irritation.-2	H319

The quantity (<1g) of ink in pens is so low that the aspiration hazard is insignificant.

Response to table and Respiratory or skin sensitisation):

The ink flow during usage is very low (~1 - 5 g/cm) which represents a low risk of exposure during normal use of writing instrument.

Comments from Nordic Ecolabelling

Thank you for your input.

Regarding classification of ingoing substances, we agree with your comments. For classification of the chemical product, there is a very small quantity which may cause


allergic reactions. Several people misuse the pen and write on their hand to remember. So, it is important to have strict requirements.

Nordic Ecolabelling consider the whole life cycle of the product when setting requirements, therefore it is also relevant to set environmental requirement, because of the impact in the production and waste phase of the products.

O18 Classification of ingoing substances

BIC Nordic AB

Response to table:

Aspiration hazard	Asp-Tox-1	H304
The prohibitions below only include products for children as well as office/hobby paints and crayons		
Sensitizing by inhalation or skin contact	Resp. Sens. 1, 1A or 1B Skin-Sens-1, 1A or 1B	H334 H317 
Acute toxicity	Acute-Tox-4 Acute-Tox-4 Acute-Tox-4	H302 H312 H332

in view of the exposure

Comments from Nordic Ecolabelling

Thank you for your input. We have taken your comments into account and have now divided the requirement in to two depending on product types. The requirement for writing instruments is now less strict to fit the exposure scenario when using the products.

O19 Prohibited substances

Havo b.v.

O19 Carbon black - prohibited substances

Carbon black: current criteria O12 state that carbon black is allowed with prove that no PAH above a certain value is present. Now O19 states that carbon black is a prohibited substance. There is still much dispute about the presumed carcinogenicity of carbon black. Statement from our supplier TTC back in 2020: *In 1995 IARC concluded, "There is inadequate evidence in humans for the carcinogenicity of Carbon Black." Based on rat inhalation studies IARC concluded that there is "sufficient evidence in experimental animals for the carcinogenicity of Carbon Black," IARC's overall evaluation was that "Carbon Black is possibly carcinogenic to humans (Group 2B)." This conclusion was based on IARC's guidelines, which require such a classification if one animal species exhibits carcino-genicity in two or more studies. Lung tumours in rats are the result of exposure under "lung over-load" conditions. The development of lung tumours in rats is specific to this species. Mouse and hamster showed no carcinogenicity in similar studies. In 2006 IARC re-affirmed its 1995 classification of Carbon Black as, Group 2B (possibly carcino-genic to humans). . Overall, as a result of the detailed epidemiological investigations, no causative link between Carbon Black exposure and cancer risk in humans has been demonstrated. This view is consistent with the IARC evaluation in 2006. See also [Carbon black - Wikipedia](#)*

If Carbon black will be prohibited HAVO can not supply black eco poster paint anymore

So Havo and our supplier do not subscribe that Carbon black by itself is a risk substance and should be prohibited, but higher values of PAH are, see eg. The work that is currently done in CEN/TC 462 – *Regulated Chemicals in Products* and CEN/TC 462/WG 1 – *"PAH"* and the German GS mark on PAH (AfPS GS 2019).

O19 Titanium dioxide (background – colours)

Please add aerodynamic diameter after < 0,1um (and typo SCEER instead of SCHEER).

For HAVO no problem as we are no longer using TiO₂ for our eco color poster paints also because using TiO₂ has a higher CO₂ impact based on LCA data.

O19 prohibited substances – Quaternary ammonium compounds

“Quaternary ammonium compounds which are not aerobically or anaerobically biodegradable“
Some years ago we after years of R&D achieved to refrain from harmful preservatives like isothiazolinones. Our partner developed an additive called Sting that is a modified polymer of a quaternary ammonium salt (H302 / H318), in final product < 625ppm
If O19 becomes true we might have to switch back to using Phenoxyethanol, that is to our opinion a less ecofriendly alternative. We checked our supplier of Sting and they are in the process of checking biodegradability at Charles River Labs, expected in May.

O19 Heavy metals

The heavy metals Cd, Pb, Cr VI, Hg and As.

Pb is a natural trace in e.g. calcium carbonate / chalk and also in cellulose used as filler in our paints. Please add a concentration limit like in the EN 71-3 (0,5ppm for cat 2). Same for other heavy metals e.g. not higher than stated in EN 71-3 cat 2, or higher than LOD

NB: not new or changed but this is the opportunity to add correct details.

Comments from Nordic Ecolabelling

Thank you for your input.

Carbon Black: About 1,000 suppliers classify in the ECHA C&L Inventory Carbon Black as Carc. 2. We therefore choose not to allow Carbon Black.

Titanium dioxide: We use < 10 um according to CLP.

Quaternary ammonium compounds: Quaternary ammonium compounds of cationic surfactants with undesirable environmental effects such as not being easily degradable are excluded. There are subgroups (e.g. esterquats) with good environmental properties, which are not excluded. Quaternary ammonium - compounds are often very toxic to aquatic organisms and if this is combined with the fact that they are not easily degradable, it results in an environmental hazard classification with H411 or H412. Quaternary ammonium compounds are linked to bacterial resistance to antibiotics¹ and may promote certain types of allergies. We therefore do not allow it.

Heavy metals: We have now set the limit to 0.5 ppm.

BIC Nordic AB

General response to the requirement:

Need to provide a clear defined list of substances with CAS# because it is too difficult to verify.

Comments from Nordic Ecolabelling

Thank you for your input.

The requirement also covers substance groups, where it is not possible to enter the CAS number.

¹ Buffet-Bataillon S., Tattevin, P., Bonnaure-Mallet, M, Jolivet-Goudeon, A. (2012). Emergence of resistance to antibacterial agents: the role of quaternary ammonium compounds—a critical review. International Journal of Antimicrobial Agents 39: 381– 389. DOI: 10.1016/j.ijantimicag.2012.01.011

Henkel Norden AB

My team has been in touch with you already before, as we'd like you to reconsider the perfume for products, especially when it comes to products like Glue Sticks. I would like to understand better the criteria and if it was considered e.g. setting certain VOC limits to perfumes where it's still acceptable amount of perfume used and where not? Thank you very much in advance!

Comments from Nordic Ecolabelling

Thank you for your input.

We consider perfume to be an unnecessary and at the same time problematic ingredient in this product group, and therefore prohibit it.

O20 Volatile Organic Compounds (VOC)

No comments in the consultation.

O21 Residual monomers in the polymer

No comments in the consultation.

O22 Preservative**Havo b.v.**

“All PT 6 isothiazolinones with a specific concentration limit (SCL) of 15 ppm or 360 ppm are limited to 15 ppm in the final product (each CLP Appendix VI entry calculated separately “

I do not understand the wording in the text in relation to the background text. Do you mean that for BIT (with a SCL of 360) Nordic Swan sets the max concentration in the end product to 15ppm (not explained in the background) , which is much stronger than CLP and the underlying risk assessment for the recent ATP? For Eco color paint of HAVO it is no problem but BIT is widely used in acrylic binders for acrylic water based paints at end concentrations between 36 ppm and 360 ppm (leading to an EUH208 sentence) . NB: toxic free preschool sets a simple limit that an EUH 208 sentence is not allowed, which is a much more transparent requirement for industry.

Comments from Nordic Ecolabelling

Thank you for your input. Unfortunately, there was a typo in the criteria/background and that it is now fixed to specify that if an isothiazolinone has an SCL of either 15 ppm or 360 ppm then they are limited to 15 ppm or 360 ppm in the criteria.

Upphandlingsmyndigheten

Antalet asterisker vid texterna under tabellen stämmer inte överens med antalet asterisker i tabellen.

Comments from Nordic Ecolabelling

Thank you for your input.

We have now corrected this.

4.3.8 Chapter 1.8 Perfume and surface treatment**O23 Perfume, aromas and other fragrance substances**

No comments in the consultation.

O24 Surface treatment or foliation

No comments in the consultation.

4.3.9 Chapter 1.9 Quality requirements

O25 Hobby paint

Upphandlingsmyndigheten

Det ställs krav på kvalitetsrutiner för att testa hobbyfärgens viskositet och homogenitet. För viskositet anges testmetoder enligt standarder, motsvarande saknas för homogenitet. Det saknas därmed krav på hur homogenitet ska uppnås och det finns inga krav på hur kvalitetsrutinen ska vara utformad.

Comments from Nordic Ecolabelling

Thank you for your input.

As far as we know there is not a standard for testing homogeneity or any specific level or scale for homogeneity. Therefore, there is no specific test method or level that must be used or fulfilled. However, there must be procedure for testing that each batch of paint is homogeneous at a level that the producers themselves set.

O26 Ballpoint and rollerball pens with ink or gel

No comments in the consultation.

O27 Markers and felt-tip pens (not whiteboard pens)

No comments in the consultation.

O28 Felt pens (whiteboard pens only)

No comments in the consultation.

O29 Pencils and pencil leads

No comments in the consultation.

O30 Pastels, crayons and coloured pencils

No comments in the consultation.

O31 Office and hobby glue

No comments in the consultation.

O32 Office and hobby tape

No comments in the consultation.

O33 Eraser

No comments in the consultation.

O34 Office supplies in monomaterial

No comments in the consultation.

4.3.10 Chapter 1.10 Consumer information

O35 Information on refills

No comments in the consultation.

O36 Information on felt-tip and marker pens

No comments in the consultation.

4.3.11 Chapter 1.11 Packaging**O37 Plastic**

No comments in the consultation.

O38 Metal

No comments in the consultation.

O39 Design of packaging**BIC Nordic AB**

Response to that the material must be 100% recycled:

This demand might be hard for many suppliers to deliver on. Due to the lack of (high demand for recycled material) available material on the market.

Comments from Nordic Ecolabelling

Thank you for your input.

After the consultation we have changed the requirement from a 100% recycled material to that plastic must be minimum 50% by weight recycled.

Danmarks Farve- og Limindustri

Af det nye forslag til kriterier fremgår det, at primær emballagen skal være i monomateriale og 100% recirkuleret eller i biobaseret materiale.

Der henvises i kriteriet til definitionen på primær emballage, som vi jf. ovenfor har problemer med at gennemskue. Men vi vil dog mene, at emballage til hobbymaling må være omfattet af O39. Imidlertid vil emballage til hobbymaling bestående af beholder, låg og etiket, ikke kunne opfylde alle kravene af flere årsager.

At der kræves, at materialet er monomateriale udgør ikke som sådan et problem, men det er et problem 1) at det skal være 100 % recirkuleret materiale eller biobaseret og 2) at både beholder, låg og etiket skal være af det samme monomateriale.

Ad 1) I de kvaliteter af emballage med genanvendt plast, der typisk er tilgængelige, er indholdet af genanvendt plast 50%, så den grænse vil naturligvis være at foretrække fremfor 100%, som ikke er almindeligt udbudt og derfor vil være ganske svært eller umuligt at skaffe. Det vil videre være et problem, da vil farven på hobbymalingen i beholder af genanvendt plast vil tage sig meget anderledes ud end i en klar beholder (f.eks. ser lysblå grøn ud). Det er derfor også et visuelt problem, men det vil også kræve ekstra emballagemateriale i form af en top-label med den konkrete farve for ikke at forvirre kunden.

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æve ekstra emballagemateriale i form af en top-label med den konkrete farve for ikke at forvirre kunden.

I forbindelse med O39 og recirkuleret indhold kunne det være relevant at indføre sætningen "Products marketed to children are exempt from this requirement", en formulering, der også fremgår under O6, når det vedrører emballager med blandinger til børn. Begrundelsen vil den samme; at der kan være uønsket kemikalier i genbrugsplasten.

Ad 2) Det er således, at beholdere til hobbymaling ofte består af enten PE eller PET, som er lidt fleksible, så man forsigtigt kan trykke hobbymalingen ud, mens låget vil være af den hårdere PP.

At etiketten også ifølge kravet skal være af samme type plast er endnu meget indgribende og vi kunne godt tænke os at stille spørgsmålet om baggrunden. Skyldes kravet at en papiretiket er en barriere for genanvendelse af plastemballagen? Eller skyldes kravet at også etiketmaterialet skal genanvendes? I så fald er det er stor fordyrelse af produkterne for nyttiggørelse af meget lidt materiale, idet der formentlig vil skulle anskaffes nyt etiketteringsanlæg.

Comments from Nordic Ecolabelling

Thank you for your input.

We agree that the definition of primary packaging could be more clear. We have therefore changed the part regarding container etc., please see more details above under section 4.3.1.

It is correct that packaging for hobby paint is covered by this requirement and other requirements in the section of packaging in the criteria.

After the consultation we have changed the requirement so that each packaging component must consist of monomaterial.

We have also changed the requirement from a 100% recycled material to that plastic must be minimum 50% by weight recycled. However, packaging for finger paint is exempt from the requirement of 50% recycled plastic, because of the risk of migration of harmful substances from the recycled plastic to the paint and the extended exposure hazard during use of the finger paint.

The requirement for labels is set so that the quality of the plastic packaging is not affected to much when it is recycled. After the consultation we have changed the requirement so that labels in PE on PP packaging and labels in PP on PE packaging are allowed if labels are removable in washing. Small amounts of PE in PP-material and vice versa only have a little negative affect of the quality of the recycled material. After the consultation we have added exception for the requirements about recyclable materials, monomaterials, separation, carbon black and labels for the part of the packaging which holds paints or glues if the common recommendation from the authorities, where the products are to be sold, is that the packaging are not to be waste sorted for recycling.

Feedback OY

Consideration could be given to those operators who do not use primary packaging as it increases the amount of unnecessary plastic, instead delivering batches of various sizes (wholesale) packed in cardboard boxes.

Comments from Nordic Ecolabelling

Thank you for your input.

The criteria of Office and hobby supplies cover many products types e.g., writing instruments, hobby paints and hobby glue. For many of the products types packaging are necessary.

O40 Information on sorting for recycling

Danmarks Farve- og Limindustri

Ifølge forslaget skal emballagen fremadrettet være mærket med piktogrammer anbefalet af nationale genbrugssystemer. Til dette krav har vi udelukkende spørgsmål. F.eks. kan I blive konkrete på, hvilke piktogrammer, der vil være relevante? Og er man i dag sikre på, at hvis anvisningen er, at de kan gå i plast-containerne hos forbrugere, gælder det så i alle kommuner? Vi hører, at ikke alle kommuner ser ens på sortering. Og hvad hvis emballagen ikke er helt tom og tør, så gælder anvisningen vel ikke. Har I gjort jer tanker om dette?

Comments from Nordic Ecolabelling

Thank you for your input.

As written in the requirement products are sold in the Nordic countries, pictograms developed by the joint European association EUPicto (www.eupicto.com) must be used. If the products are sold in other countries the pictograms recommended by national recycling systems must be used. To make this clearer we have after the consultation changed order and wording of the text in the requirement.

Overall, the sorting of household waste is the same in all the Danish municipalities. There may be a difference in which fractions are collected in containers at households, but the pictograms on the containers and the later sorting are the same.

After the consultation exception for pictograms has been added for the packaging which holds paints or glues if the common recommendation from the authorities, where the products are to be sold, is that the packaging are not to be waste sorted for recycling.

After the consultation additional requirement has been added about information on the packaging that paints, and liquid glue must not be emptied down the drain but delivered to an approved hazardous waste collection point. Also, requirement has been added that if the relevant country of sale has possibility to sort the packaging of paints and liquid glue for recycling, then information must be placed on the packaging that it should be emptied and dry before waste sorting.

4.3.12 Chapter 1.12 Licence maintenance

O41 Customer complaints

No comments in the consultation.

O42 Traceability

No comments in the consultation.

4.3.13 Appendices

No comments in the consultation.

5 Comments to the background, in detail

No comments in the consultation.

6 Discussion and conclusion

A total of 9 consultation comments were received.

Most comments were given on requirements:

- Recycled plastic (O6)
- Test for harmful substances in recycled plastic (O7)
- Requirements for chemical products (e.g. ink, paint) (O17-O19)
- Design of packaging (O39)

O6 Recycled plastic

The comments were regarding that it may be difficult to get the needed amount of recycled plastic material.

Follow up after consultation:

After the consultation the requirement was change from a minimum of 60% of the plastic to be recycled to minimum 50%.

O7 Recycled plastics: Test for harmful substances

The comments were regarding the substances that must be tested for and that it may be difficult to live up to the limits.

Follow up after consultation:

After the consultation the requirement was change regarding the list of substances that must be tested for, the limits and the test methods. The updated requirement is based on the most common harmful substances found in PCR plastic, but also substances, limits and test methods from standard EN 71-3 and EN 71-9 for toys, packaging and waste packaging directive, REACH etc.

O17 Classification of the chemical product

O18 Classification of ingoing substances

O19 Prohibited substances

The comments were regarding the classifications compared to the exposure during use and comments on specific substances.

Follow up after consultation:

After the consultation the requirements O18 and O19 were change by dividing them into product types (one for hobby paint, glue, chalk, colored chalk and all products marketed to children, and one for writing instruments (except chalk and colored chalk), tape and erasers) where the group for writing instruments have some few classifications that must be fulfilled because of the exposure scenario during use.

O39 Design of packaging

The comments were regarding the 100% of recycled material, only monomaterial and labels.

Follow up after consultation:

After the consultation the requirement was change from a 100% of recycled material to 50% recycled plastic, that packaging components must be in monomaterial (instead of the entire packaging), that separation of material must be possible, that different materials must not be glued or welded together, that carbon black must not be used in plastic and allowance of PP or PE labels on PE or PP container. In addition, exception for the part of the packaging which holds paints or glues if the common recommendation from the authorities, where the products are to be sold, is

that the packaging are not to be waste sorted for recycling. However, plastic must still be minimum 50% recycled.