

Background to Nordic Ecolabelling for

Copy and printing paper – supplementary module

Version 4.4 – 12 November 2019

Nordic Swan Ecolabelled copy and printing paper - Background to Nordic Ecolabelling criteria

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Appendix 1 Comparison of Nordic Swan Ecolabel and EU Eco-label requirement levels

1 Summary

This document describes the background to the requirements stipulated by the criteria document “Nordic Ecolabelling for copy and printing paper – supplementary module, version 4”. It justifies the requirements for applicants, users and other stakeholders. Nordic Ecolabelling criteria consider the entire lifecycle of a product. Requirements are chosen based on the market situation and the individual requirement's relevance, potential and controllability (RPC).

The primary requirements on copy and printing paper relate to the production of the paper. The purpose is to reduce environmental impact by promoting:

- Wood from sustainable forests
- Environmentally suitable chemicals
- Low emissions to water and air
- Low energy consumption
- The sorting and recycling of waste
- Environmental and quality control
- High product quality

The criteria for copy and printing paper are divided into three documents: supplementary module, basic module and chemical module.

The basic module covers requirements common to paper and pulp production irrespective of the use of the paper or pulp.

The “Criteria for Nordic Ecolabelling for copy and printing paper – supplementary module” contain general requirements for ecolabelled products (marketing, take-back systems for packaging, etc.) and requirements specific to the product group.

The most important changes made to the draft proposal for version 4 of the supplementary module are:

- Tightened energy requirements

The basic module and chemical module have also been revised. The most significant changes are:

- Requirements in regard to certification of sustainable raw products have been tightened.
- Requirements in regard to energy and CO₂ emissions have been made more stringent.
- Requirements in relation to CO₂ emissions during transportation have been introduced.
- The effects of filler material have been removed from the calculation matrix.
- The requirements on AOX have been tightened.
- A general prohibition of classified chemicals has been introduced.
- A GMO ban has been introduced for starches.

2 Basic facts about the criteria

2.1 Products eligible for labelling

The product group of copy and printing paper includes the following types of paper:

Wood-based and wood-free unconverted copying and printing paper that is made from chemical and/or mechanical pulp and/or recycled fibre for writing, printing and copying.

The following boards made from chemical and/or mechanical pulp and/or recycled fibre can also be Nordic Swan Ecolabelled.

- Solid bleach board (SBB), solid bleached sulphate (SBS) and solid unbleached board (SUB).
- Folding boxboard (FBB)
- White lined chipboard (WLC)

Only paper with a distinct trade name can be ecolabelled. Paper with a trade name that may appear on both ecolabelled and non-ecolabelled paper is not eligible for Nordic Swan Ecolabelling.

These criteria do not apply to tissue paper, greaseproof paper, coffee filters, cardboard (other than the aforementioned), kraft paper or sack paper.

2.2 Justification for Nordic Ecolabelling

There are four main environmental aspects significant to paper products. These are forestry, and chemical use, emissions and energy use during pulp and paper production. These environmental aspects are described in the background document to the basic module¹.

2.3 Criteria version and validity

The modular system for paper product criteria (basic and chemical module) was adopted in the autumn 2003. The criteria document for the ecolabelling of copy and printing paper, version 3, was adopted by the Nordic Ecolabelling Board on 15 March 2005 and is valid until 30 June 2012. The criteria for copy and printing paper were then incorporated in the modular system. Version 4 of the criteria was adopted on 22 June 2011.

2.4 The Nordic Market

The Nordic market for copy and printing paper is dominated by a few major actors. Production is primarily located in the Nordic area, but some products also come from northern Europe. In 2008, the global production of copy and printing paper was 147 million tonnes. Finland was the sixth largest producer and Sweden the seventh largest producer. Together they produced over 15 million tonnes. That year, Sweden and Finland exported approximately 14 million tonnes of copy and printing paper².

The consumption of copy and printing paper in Europe has levelled off at approximately 28 million tonnes/year. It is predicted that consumption will drop roughly 0.4% over the next five years³.

2.5 Nordic Swan Ecolabelling licences

Table 1 presents the number of valid Nordic Swan Ecolabel licences (2010) for various product groups. Please note that, at the time of writing, in addition to licensed paper products there exists a large number of graphical printing paper products approved for use in Nordic Swan Ecolabelled printing plants that fulfil the requirements for licensed printing paper.

Table 1. Number of Nordic Swan Ecolabel licences for paper products including copy and printing paper, June 2010

Product group	Number of licences (2010)				
	DK	FIN	NO	SE	Total
Copy and printing paper	0	6	3	7	16
Tissue paper	4	10	0	26	40
Coffee filter paper	0	2	0	4	6
Grease-proof paper	2	2	1	2	7
Envelopes	0	4	2	3	9
Total	6	24	6	42	78

2.6 Other labels

The industry's own efforts in regard to environmental issues are in part directed by legislation and in part a result of voluntary measures. The most important voluntary measures stem from environmental management systems, environmental declarations and environmental labelling. Requirements in regard to environmental considerations increasingly form part of invitations to tender. A number of environmental labelling schemes, in addition to Nordic Ecolabelling, are in operation.

Environmental Management

Environmental management systems are a means of creating order in corporate operations and facilitate continual improvement on the basis of the company's own environmental objectives. Environmental management systems do not, however, stipulate specific threshold values in regard to the products or production processes. EMAS, the Eco-Management and Audit Scheme developed by the EU, and international standard ISO 14001 are important in the field of environmental management systems.

Environmental declarations

Environmental declarations provide detailed environmental information without stipulating requirements regarding the product itself. There are no predetermined limit values. The usefulness of the declaration is dependent on the purchaser's prior knowledge of environmental concerns surrounding the product. There is at present no internationally recognised system for environmental product declarations, but this is an

issue under preparation by ISO. Product category rules (PCR) are required in order to be able to make an environmental declaration.

Paper Profile⁴ is one such self-declaration system designed for the paper industry, covering several environmental parameters, for example: certification of timber, emissions, purchased electricity and quantity of deposited waste. This system, too, does not place any prohibitions on any products or operations that may be less desirable from an environmental point of view.

FSC and PEFC labelling

A paper product may bear the FSC (Forest Stewardship Council) label if it contains a certain quantity of certified fibres. This label is also used for printed matter and has grown in popularity over the last few years. The Harry Potter series of books are the best known examples of publications carrying the FSC label. Similarly, products may also be marked with the PEFC, Programme for the Endorsement of Forest Certification, label. These labels are, however, solely concerned with the origins of timber based raw material and say nothing about the later phases of a labelled product's life cycle. As regards printed matter, for example, FSC/PEFC labelling does not take energy consumption, emissions or use of chemicals into account – neither when the pulp or paper is produced, nor at the printing stage.

Public sector tendering

Public organisations have, in many countries, developed environmental criteria for public sector purchasing⁵. One example of such a body is the EKV instrument in Sweden. They use Nordic Ecolabelling's method to calculate emissions to air and water but do not set requirements on forestry or chemicals. Nordic Ecolabelling co-operates with such groups in the Nordic countries and is often represented in the various working groups that are formed to draw up criteria in product segments for which Nordic Ecolabelling has developed labelling requirements. The EU Commission also publishes manuals containing guidelines for public sector purchasers seeking to apply environmental standards in their purchasing⁶⁷.

Environmental labelling

Environmental labelling, or ecolabelling, is the most effective way of making it easier for the consumer to choose products with the least negative impact on the environment. The products are granted approval in accordance with specific environmental requirements and the licensing organisation alone makes the necessary complex judgements in respect of the product's effects on the environment. The system excludes products that do not meet the requirements and independent third parties perform checks on the products.

In addition to the Nordic Swan Ecolabel, there are a number of other environmental labelling schemes operating in the field of paper products:

- The EU Ecolabel⁸ covers both copy paper/ graphical paper and tissue paper products within the EU.
- The Swedish Society for Nature Conservation maintains its own ecolabel, Good Environmental Choice, for the Swedish market.
- The German Blue Angel ecolabel has requirements for recycled paper.
- The Canadian EcoLogo Program has criteria for printing and writing paper and for uncoated mechanical printing paper.

Nordic Ecolabelling's efforts in the field of paper products have, so far, met with great success; probably since a large proportion of the cellulose pulp and paper used in Europe is manufactured in the Nordic countries. The Nordic Swan Ecolabel is well known in the field of paper products even outside the Nordic region. There are several license holders based abroad.

Knowledge and insight gained from Nordic Ecolabelling's years of experience of labelling paper products has been valuable for revision of EU Ecolabel criteria. Nordic Ecolabelling strives, wherever it is appropriate, to harmonise the requirements it places on licensed products with those set by the EU Ecolabel. Several countries have elected to implement Nordic Ecolabelling criteria when designing their own ecolabelling schemes. New Zealand and the Netherlands offer examples of this.

The EcoLogo criteria for paper regulate the use of fibre (100% from certified sustainable forests) emissions of organic materials to water (COD), the toxicity of effluent (TEF_{sub}) energy consumption, global warming potential (CO₂-equivalents), emissions of SO₂ to air and quantities of waste⁹. The number of licensed products is limited.

3 About the revision

As environmental criteria were developed for different types of paper products and in regard to the product's entire life cycle, from forest to waste disposal, criteria documents became ever more complex as they grew in size to contain many more requirements. Previously a comprehensive criteria document was produced containing requirements for each product group (such as printing paper, coffee filter paper and envelopes) in regard to forestry management and pulp and paper production. These criteria were revised at different points in time and by different working groups. As a result requirements regarding the same chemicals or pulp were formulated in different ways, even when production processes and environmental effects were identical.

In order to solve this problem a new way of structuring criteria documents was developed, with the modular criteria being finalised in the autumn of 2003. The modular system was introduced for the first time when applied to criteria for coffee filter paper, greaseproof paper and paper envelopes. This common structure has since been introduced, as criteria have undergone the process of revision, for all paper product groups.

The modular system of presenting criteria is based on the idea that all requirements common to the various paper product groups, for example in regard to pulp and chemicals, are located in a common criteria module, the so-called basic module. Product specific requirements are stipulated in so-called supplementary modules. Such supplementary modules are specific to a particular product group. The requirements levels in a supplementary module may be more stringent or more lenient than those of the basic or chemical module. If the standards required in the modules differ, the requirement levels specified in the applicable supplementary module are to be applied.

The criteria in the basic and chemical modules underwent evaluation at the same as the supplementary module for copy and printing paper during 2006 and 2007. Following this

evaluation the conclusion was reached that the modular system should be retained and the criteria revised.

The evaluation report presented a summary of how climate changes in the last few years have resulted in a greater focus on issues of energy use and emissions of greenhouse gases, which has led to the development of different types of energy-saving measures and the use of biofuels at many energy generation plants. These developments have proceeded at greater speed than could have been anticipated at the previous criteria revision. Consequently, there is great need to strengthen requirements in regard to energy use and generation. The evaluation of the criteria also indicated that there is potential for strengthening standards required in regard to carbon dioxide emissions.

Accordingly, emphasis has been placed on the revision of the requirements regarding CO₂ emissions and energy. All other requirements have also been considered and updated. Requirements in regard to chemicals, timber based raw materials and emissions to air and water have, in particular, been made more stringent. Additionally, requirement texts and requirements in regard to documentation have been clarified.

Work on this revision has taken place in the period 2008 to 2011. Various interested parties, e.g. representatives from the industry, have been consulted through personal contacts.

The following people have participated in the working-party:

Ulla Sahlberg (2008-2009)/Maria Göransson (2010), Sweden
Elisabeth Magnus (2008-2009)/Kristian Kruse (2010), Norway
Suvi Sormunen (2008-2009)/ Niina Tanskanen /Niina Tanskanen, Finland
Thomas Christensen, Denmark

Karin Bergbom/Elisabet Magnus has acted as Nordic area co-coordinators well as project leader for 2010-2011.

Mette Sjölin has assisted in certain parts of the revision as a technical expert.

4 Justification of the requirements

This chapter presents the background to the proposed changes to the requirements stipulated in the supplementary module for copy and printing paper.

4.1 Product group definition of copy and printing paper

Which products are included in the product group has been clarified.

“The product group comprises the following types of paper:

Wood-based and wood-free unconverted copying and printing paper that is made from chemical and/or mechanical pulp and/or recycled fibre for writing, printing and copying.

The following boards made from chemical and/or mechanical pulp and/or recycled fibre can also be Nordic Swan Ecolabelled.

- Solid bleach board (SBB), solid bleached sulphate (SBS) and solid unbleached board (SUB).
- Folding boxboard (FBB)
- White lined chipboard (WLC)

Only paper with a distinct trade name can be ecolabelled. Paper with a trade name that may appear on both ecolabelled and non-ecolabelled paper is not eligible for Nordic Swan Ecolabelling.

These criteria do not apply to tissue paper, greaseproof paper, coffee filters, cardboard (other than the aforementioned), kraft paper or sack paper.

“Wood-based copy and printing paper” refers to paper containing more than 10% mechanical pulp and “wood-free copy and printing paper” paper containing more than 90% chemical pulp. Paper also contains various quantities of filler. Examples are coated and uncoated copy and printed paper on rolls or in sheets, newsprint, magazine paper, light-weight coated (LWC) and super calendar (SC) paper.

The product group definition previously included “graphic board”. This term has been clarified by specifying the common trade terms: solid bleached board (SBB) and solid unbleached board (SBB) and solid bleached sulphate (SBS). Solid board comprises several layers of a single material such as cellulose pulp or mixed pulp.

Folding boxboard (FBB) is a multi-layer board comprising a surface layer of bleached cellulose pulp, a mid layer of mechanical pulp (groundwood or thermomechanical pulp) and a backing of bleached or unbleached cellulose pulp.

White lined chipboard (WLC) is a multi-layer board with a surface layer of bleached cellulose pulp and a core and backing made of recycled fibre. Bleached and unbleached cellulose backings are also available.

Cardboard is a broad term. The types proposed for inclusion in the product group have been selected since the criteria are well-suited and due to demand from printing firms wishing to print ecolabelled postcards and similar.

4.2 Revised criteria

4.2.1 Energy requirements for standard copy and printing paper

Requirement R3.

This requirement is new to the supplementary module but was previously found in the basic module. The requirement has been tightened in this revision.

The background document to the basic module provides comprehensive information on the energy requirement and the basic module describes the calculations in detail. The following paragraphs provide brief information specific to copy and printing paper.

The requirement stipulates the declaration of the total energy consumption in pulp and paper production processes per tonne of product, specified for fuel and electricity. This is calculated using actual values from the producer and reference values provided by Nordic Ecolabelling. These reference values have been tightened in this revision.

A points limit for fuel and electricity respectively of 1.23 is proposed in the basic module, version 2. This is a considerable tightening of requirements in regard to the points score when compared to version 1, in which the limit was set at 1.75. The requirement is designed to ensure optimal use of energy.

The background to the new points limit of 1.25 for fuel and electricity is formed by a desire to ensure that the energy requirement for paper approved according to the criteria of the basic module is tough and demanding. This limit can then be applied to, for example, paper for use by printing plants or in hygiene products, depending on the formulation of the relevant requirements in the appropriate criteria documents.

The new points limit, in the cases of both electricity and fuel, is, according to the proposal, to be set at 1.15 for paper that is to be licensed as Nordic Swan Ecolabelled copy and printing paper. This is more stringent than the limit of 1.25 set out in the current criteria document, version 3 for copy and printing paper. The new points level is based, first and foremost, on data provided by licence holders. A points limit of 1.15 indicates that the average value of the paper product's total energy consumption may not exceed 15 % of the level under optimal conditions. The points model permits a higher level of energy consumption in order to allow the paper manufacturer an increased degree of flexibility.

Documentation Calculations in accordance with Appendix 2 of the basic module (version 2) showing compliance with the limit values. Nordic Ecolabelling also provides a worksheet that is to be used for these calculations.

4.2.2 Energy requirements for special paper and niche products

Requirement R4 (previously R9)

The background document to the basic module provides comprehensive information on the energy requirement and the basic module describes the calculations in detail. The following paragraphs provide brief information specific to special paper and niche products.

The requirement stipulates the declaration of the total energy consumption in pulp and paper production processes per tonne of product, specified for fuel and electricity. This is calculated using actual values from the producer and reference values provided by Nordic Ecolabelling. These reference values have been tightened in this revision.

For special paper and niche products, there is a new requirement limit regarding fuel and electricity consumption of 1.25. This is the same level as proposed in the basic module. A

points limit of 1.25 indicates that the average value of the total energy consumption may not exceed 25% of the level under optimal conditions. This is a more stringent points limit for total energy consumption than in version 3.2, in which the limit was 1.5.

The criteria document clarifies which products that can be ecolabelled as special paper or niche products. The definition is unchanged from the previous version. Special paper and niche products are permitted a higher points limit since these are often produced using special techniques and in small volumes. It is more difficult to control these processes and they are less efficient than the equivalent large-scale production. Special papers are often marketed and sold on the consumer market. Nordic Ecolabelling wishes to enable consumers to choose Nordic Swan Ecolabelled special paper (e.g. letter paper).

4.2.3 Take-back system

Requirement R6 (previously R4)

There has previously been a voluntary industry agreement on packaging operations in Norway, which has led Nordic Ecolabelling to have a requirement to ensure that licensees for a number of (45) product groups comply with this regulation.

Requirements for return systems have now been incorporated into the Norwegian Waste Regulations, which means that the Nordic Ecolabelling requirement for membership in a return company will be out of date and therefore no longer need to be managed by Nordic Ecolabelling in a separate requirement.

5 Changes compared to previous versions

A product group definition regarding cardboard has been specified.

No new criteria have been added to the supplementary module for copy and printing paper. The requirement limits in the version 2 of the basic module have been tightened. These apply to copy and printing paper. For further information, refer to the background document to the basic module.

The revised criteria are presented in section 4.2 above. In addition, general directions regarding application and the scope of the product group have been revised.

The following requirements have been omitted:

- *Requirement R3 “Personnel responsible for marketing”.*

This requirement is included in requirement R2.

- *Requirement R6 “Environmental and quality assurance”*

This requirement makes reference to version 2 of the basic module.

Appendix 1 compares the proposed requirements with the existing requirements for copy and printing paper and the EU Eco-label's most recently proposed requirements.

6 Adjustments in version 4

On 15 May 2013, the Secretariat Manager Meeting decided to prolong the validity of the criteria with two years. The new version is called 4.1 and it is valid until 30 June 2016.

On 5 November 2015 the Nordic Ecolabelling Board decided to prolong the validity of the criteria document with three years. Some minor editorial changes were also introduced. Requirement R5 Marketing was removed based on the Board of Directors decision on 17 November 2014. The new version is called 4.2 and it is valid until 30 June 2019.

On the 9 October 2017 Nordic Ecolabelling's Criteria Group decided to remove K6 Take-back system. Furthermore the Nordic Ecolabelling's Criteria Group decided on the 14 December 2017 to prolong the criteria with 18 months to the 31 December 2020. The new version is called 4.3.

Nordic Ecolabelling's Criteria Group decided on 12 November 2019 to prolong the criteria for copy and printing paper with 12 months to the 31 December 2019. The new version is called 4.4.

7 Future criteria

The focus of future requirements in respect of the environmental labelling of paper products is likely to continue to fall on sustainable forest management, energy consumption and the problems of climate change. The use of chemicals is also likely to be an issue of concern in the future.

8 References

¹ Background document to basic module, draft of version 2. Nordic Ecolabelling of paper products, Nordisk Ecolabelling, September 2010

² www.forestindustries.fi

³ www.skogsindustrierna.org

⁴ Paper Profile, <http://www.paperprofile.com/>, 20 January 2002

⁵ Miljø og regelverk for offentlige anskaffelser (The environment and legislation for public procurement), guidelines from the Norwegian Ministry of Trade and Industry, January 2004, publication. K-0662 B

⁶ Commission interpretative communication on the Community law applicable to public procurement and the possibilities for integrating environmental considerations into public procurement, Brussels, COM(2001) 274, 4 July 2001.

⁷ Buying green – A handbook on environmental public procurement?, Commission of the European Communities, Brussels 18.8.2004, SEC (2004) 1050.

⁸ Website of EU Ecolabel, http://europa.eu.int/comm/environment/ecolabel/index_en.htm, May 2004

⁹ The EcoLogo Program, Canadian type 1 ecolabel, criteria for paper, CCD-077 and CCD-078, Website: <http://www.ecologo.org/en/>

Appendix 1 Comparison of Nordic Swan Ecolabel and EU Eco-label requirement levels

Requirement	Nordic Ecolabelling – Copy and printing paper version 3.	Nordic Ecolabelling – Copy and printing paper version 4, 2011	EU Ecolabel, current requirement	EU Ecolabel, new criteria adopted October 2010
Product definition		Copy and printing paper and cardboard		Copy and printing paper up to 400 g/m ² Newsprint is not included within the scope of the criteria.
Fibre raw material	20% certified fibre raw material or 75% recovered fibre	Assessment of forestry standards 30% certified ¹ fibre raw material or 75% recycled fibre	10% certified	Up to 50% certified ² fibre raw material
Fibre raw material	Traceability requirements for all wood and fibre raw materials	Pulp and paper mills must be COC certified. Traceability requirements for all wood and fibre raw materials	Traceability requirements for all wood and fibre raw materials	Virgin fibre raw material shall be accompanied by a valid forestry and CoC certificate
Chemicals				
General prohibition of environmentally harmful, very toxic and CMR classified chemicals	No	Yes ³	No	Yes ⁴
Alkylphenoethoxylates	Prohibited	As previous	Prohibited	As previous
De-inking surfactants	Yes	As previous	Yes	As previous
Biocides	Yes	As previous	Yes	As previous
Residual monomers	Yes Acrylamide limit 700 ppm	New requirement on classified residual monomers Ban on bisphenolA.	Yes	As previous Acrylamide limit 700 ppm
Foam inhibitors	Yes	As previous	No	As previous
Wet strength agents	Yes	As previous	No	No
Bleaching agents.	Chlorine gas prohibited	As previous	Chlorine gas prohibited	As previous
Dyes for printing and colouring	Yes	New requirement on classified constituent substances	No	No
Environmental classification of dyes	Yes	New requirement on classified constituent substances	Yes	As previous

¹ In addition to wood fibres, Nordic Ecolabelling permits the use of bamboo, cotton linters, linen and flax. Nordic Ecolabelling stipulates strict requirements in respect of standards according to which forestry must be certified

² FSC, PEFC or equivalent certification system

³ The requirement applies to all organic production chemicals

⁴ The requirement applies to substances and mixtures with several exemptions.

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Heavy metals	Yes	Clarification of requirement on heavy metals	Yes	As previous
Compounds in dyes	Pb, Hg, Cr and Cd under 100 ppm	As previous	Ag, As, Ba, Cd, Co, Cr, Cu, Fe, Hg, Mn, Ni, Pb, Se, Sb, Sn and Zn. Various levels.	As previous
Phthalates	Prohibited	As previous	No	No
Amines/Azo dyes	Yes	As previous	Yes	As previous
Adhesives	Yes	As previous	No	No
GMO starch	No	Yes, prohibited	No	No
Emissions to air/water				
Emissions: COD, P, S and NOx	Yes, individual emissions <1.5. Total <4	As previous – New reference value for NOx	Yes, but not P. Individual emissions <1.5. Total <4	New requirement on P Total <4
AOX	Weighted average from used pulps <0.25 kg/t Each individual pulp <0.4 kg/t	Weighted average from used pulps <0.17 kg/t Each individual pulp <0.25 kg/t	Each individual pulp <0.25 kg/t	Until 31 March 2013 <0.20 kg/t for each individual pulp. From 1 April 2013 <0.17 kg/t for each individual pulp.
CO ₂	1300 kg/t paper (excl. drying of pulp) 1800 kg/t paper (incl. drying of pulp)	1000 kg/tonne paper (100% recycled fibre pulp) 900 kg/tonne paper (100% chemical pulp) 1600 kg/tonne paper (100% mechanical pulp) ⁵	Integrated mill max 1000 kg/t (incl. all electricity production) Unintegrated mill 1100 kg/t	As previous. New: Electricity generated from renewable energy sources may be removed from electricity calculations ⁶
CO ₂ , transport	No	CO ₂ from transport (from forest to mill) shall be calculated and submitted	No	No
Energy				
Electricity	Score P _{electricity} <1.75 and	Score P _{electricity} ≤1.15	Score P _{electricity} ≤1.5	As previous
Fuel (heating)	P _{energytotal} : (P _{electricity} +P _{fuel})/2 <1.25	Score P _{electricity} ≤1.15	Score P _{fuel} ≤1.5	As previous
Reference value: electricity, fuel, pulp and paper	Yes, from BREF 2001, though generally somewhat more stringent than EU Ecolabel	Tightened reference values by average 23% ⁷	Yes, from BREF 2001	As previous
Energy requirement, special + niche paper	P _{energytotal} : (P _{electricity} +P _{fuel})/2 <1.5	Score P _{electricity} ≤1.5 Score P _{electricity} ≤1.5	Score P _{electricity} ≤1.5 Score P _{fuel} ≤1.5	As previous
Sorting of waste	Yes	As previous	Yes	Yes

⁵ The emission of CO₂ from purchased electricity and fossil fuel used for heating and electricity must not exceed the following limit values. CO₂ emissions from purchased electricity shall be calculated on a basis of 985 g CO₂/kWh. This means that no deductions may be made for green electricity.

⁶ As defined by Council Directive 2009/28/EC

⁷ Effect of filler also contributes.

