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The Eco-Choice Ecolabel Programme

Product Standard

Tissue Paper Products

Tissue Paper and Sanitary Paper Products

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Use of This Standard

This voluntary environmental labelling standard may be used by competent environmental assessors to establish product compliance with the Eco-Choice Ecolabel Programme. Products that are certified with the mark of conformity in terms of this standard have been independently assessed and demonstrate compliance to the environmental and social performance criteria detailed in this standard. The overall goal of environmental labels and declarations is the communication of verifiable and accurate information, which is not misleading, on environmental aspects of products and services. This encourages the demand for, and supply of, those products and services that cause less stress on the environment, thereby stimulating the potential for market-driven continuous environmental improvement.

This standard identifies environmental, quality, regulatory and social performance criteria that products sold on the South African market can meet in order to be considered as good "environment practice". Products that have been certified as complying to this standard may gain greater market recognition and a marketing advantage in government and business procurement programs, as well as broad consumer preference.

This standard has been developed from the Good Environmental Choice Australia (GECA) standard SPPv3.0ii and Nordic Swan: Tissue Paper and Tissue Products standard. Modifications to the source document have been made to maintain relevancy to the Southern African environment. The principal difference between the source document and the modified adopted ECA standard is the replacement of GECA terminology and legislative references with terminology and references relevant to Southern Africa. A list of changes to the source document along with the justification can be obtained upon request from ECA.

This standard can be used by South African manufacturers to guide their designs for environment programs by using the environmental criteria as key performance benchmarks to reduce the environmental loads of their product. The standard is necessarily restricted in its identification of environmental loads from the product lifecycle. Producers should consider other environmental measures along the product cycle, which are not included in this standard, in their environment program designs for and aim for even higher levels of environmental performance where technically possible.

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ECO-CHOICE ECOLABEL PROGRAMME STANDARD FOR ENVIRONMENTALLY RESPONSIBLE PAPER PRODUCTS

Tissue Paper Products (Tissue Paper and Sanitary Paper Products)

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Abstract

This Standard specifies environmental performance requirements for the award of the Eco-Choice ecolabel to tissue paper products (tissue paper and sanitary tissue paper products) that may objectively be classified as environmentally responsible and are outside the scope of any other Eco-Choice Ecolabel Programme or other South African National standard. The Eco-Choice Ecolabel Program complies with ISO 14024: "Environmental labels and declarations - Guiding principles" which requires environmental labelling specifications to include criteria that are objective, reasonable and verifiable.

Definitions

For the purpose of this standard, the following definitions shall apply:

Aerobically biodegradable: A substance that is biodegradable.

Anaerobically degradable: A substance that, when measured as directed in ISO 11734 “Water quality - Evaluation of the "ultimate" anaerobic biodegradability of organic compounds in digested sludge - Method by measurement of the biogas production”, achieves at least 60 % degradation.

Binders: paper-based products used for storing of documents or magazines and consisting of a cover, usually made of board, with rings for holding loose papers together, including ring binders and lever arch files;

Bioaccumulative: A substance is classified as potentially bioaccumulative if the log KOW (log water/octanol partition coefficient) is equal to or greater than 3**.**

Biodegradable: Organic substances that decompose in the natural environment due to the action of living organisms.

Carcinogenic: Capable of causing cancer. The International Agency for Research on Cancer is the internationally accepted body for the classification of carcinogenic substances. See www.iarc.fr.

CAS number: Chemical Abstract Service number. Unique CAS numbers are assigned to chemical compounds as a means of identification.

Chemical pulp: Pulp produced using the sulphite or sulphate (Kraft) methods (using bisulphite or sodium hydroxide liquor).

CI number: Colour Index Number, as assigned by the Society of Dyers and Colourists and the American Association of Textile Chemists and Colourists**.**

Cleaning Agents: shall include (a) liquid chemicals used to wash printing forms, both separate (off-press) and integrated (in-press), and printing presses to remove printing inks, paper dust and similar products; (b) cleaners for finishing machines and printing machines, such as cleaners to remove adhesive and varnish residues; (c) printing inks removers used in washing off dried printing inks; not including cleaning agents for cleaning other parts of the printing machine or for cleaning other machines than printing machines and finishing machines;

Demonstration of Conformance (DoC): Defines sources of evidence acceptable to ECA to demonstrate compliance with each criterion of the standard. An applicant manufacturer must provide documentation to the approved assurance providers in order to demonstrate conformance of its products under assessment.

Eco-Choice Ecolabel Program: a Type 1, ISO 14024 compliant eco-labelling program operated by Eco-Choice South Africa.

ECA: is the acronym for Eco-Choice Africa;

Environmental Load: is defined as stress (such as pollution) and excess demand for natural resources placed on ecosystems by the active ingredients in a product or service during its intended life cycle.

Fugitive Emissions: any emissions not in waste gases of volatile organic compounds into air, soil and water as well as solvents contained in any products;

Food Contact: any product or material which comes into direct contact with foodstuffs;

GEN: Global Ecolabelling Network, the international environmental product labelling Association;

Halogenated Organic Solvent: any organic solvent which contains at least one atom of bromine, chlorine, fluorine or iodine per molecule**;**

Packaging means: all products made of any material of any nature to be used for the containment, protection, handling, delivery or presentation of goods, from raw materials to processed goods, from the producer to the user or the consumer;

Paper for Recycling: paper waste stream generated during the production of finished product;

Post-consumer material: Material generated by households or by commercial, industrial and institutional facilities in their role as end-users of the product which can no longer be used for its intended purpose. This includes returns of material from the distribution chain.

Producer/manufacturer: For the purpose of this standard these terms comprise both manufacturers of a product as well as service suppliers. These may not necessarily be the companies that apply for ECA certification, since certification can also be awarded to retailers of a product. However, for some criteria it is required that the original manufacturer of the product conforms to particular requirements.

Tissue Paper Products: facial tissues; toilet tissue; personal hygiene tissue products; napkins and serviettes; as defined in the standard;

Surfactant or "surface-active agent": Any substance which is intended to reduce surface tension thereby helping water to surround and remove dirt or staining from surfaces.

Teratogenic: Any substance capable of causing heritable genetic damage, producing congenital deformations or causing birth defects. The criteria for classification of a substance as teratogenic are defined by the National Industry Chemical Notification and Assessment Scheme (NICNAS).

Volatile Organic Compounds (VOC): any organic compound as well as the fraction of creosote, having at 293,15 K a vapour pressure of 0,01 kPa or more, or having a corresponding volatility under the particular conditions of use;

1 INTRODUCTION

1.1 Purpose

This Standard seeks to provide a framework for the recognition of good environmental performance for environmentally responsible tissue paper products, specifically tissue paper and sanitary paper products. Voluntary environmental labelling standards implemented by Eco-Choice Africa (ECA), aim to specify environmental performance criteria for the environmental loads of products and services throughout the major aspects of their life cycle.

1.2 Background

The production and consumption of products and services invariably generates a number of environmental loads, many of which result in the degradation of our natural environment. The purpose of this Standard is to define the environmental load reduction requirements for a range of defined tissue paper products for the South African market which can be classed as "environmentally responsible" products.

There is a growing public awareness of the need for sustainable consumption and a concomitant increase in consumer demand for products and services that reduce the environmental burden of day-to-day life. Product designers are increasingly aware of the environmental impact of their choices, and continuous technological innovations are creating opportunities for significant environmental gains by allowing the redesign of previously environmentally harmful products or the invention of new functional products with a greatly reduced ecological footprint.

Eco-Choice Africa uses this Standard to recognise and support truly environmentally responsible paper products where there is clear evidence of strong environmental load reductions compared to competing products performing the same function in the South African market, and where the product would not otherwise receive recognition based on an existing or planned ECA Standard category.

2 STANDARD CATEGORY SCOPE

1. This standard is applicable to a defined range of paper products on the South African market that are not addressed by other voluntary environmental labelling standards. The product group shall comprise the following products:
   - Toilet paper
   - Facial tissues
   - Paper towels, hand towels
   - Table napkins
   - General purpose wipes
   - Table coverings, placemats, tray liners

   The sanitary paper product must comprise at least 95 % of materials that are covered by criteria in this standard.

2. This standard does not include nonwoven sanitary products, disposable diapers, sanitary pads or tampons

3. The product group shall not include the following products or materials:
   - Fragranced tissue products
   - Tissue products containing cleaning agents designed for the cleaning of surfaces (e.g. floor cleaning agents).
   - Structured paper
   - Cosmetic products including wet wipes which may be labelled in accordance with the Criteria for Cosmetic Products,

3 ENVIRONMENTAL PERFORMANCE CRITERIA

3.1 Fitness for Purpose

Certified products should be good performers in their intended application. Certain standards of quality and product performance are implicit in the Label. The manufacturer of the product must ensure that the product is fit for its intended purpose and that:

3.1.1 Applicable Standards

The product meets or exceeds the requirements of the relevant South African Standard for its intended application, or the product meets or exceeds the applicable and accepted standard in its target market if it is to be exported, or

3.1.2 Other Evidence of Fitness for Purpose

Where there is no suitable industry standard governing fit-for-purpose, the product can demonstrate sufficient quality by providing testing reports from an independent laboratory or organization, or case studies that demonstrate market suitability and quality. Where the manufacturer of the tissue paper product differs from the Applicant, the manufacturer must provide adequate evidence of compliance with all relevant manufacturing criteria.

3.2 Environmental Load Reduction

The product shall exhibit an environmental improvement or have innate properties that demonstrate a significant reduction of environmental load compared with products that meet the same consumer need. This reduction must be related to the primary environmental loads of the product, and not be limited to small or insignificant improvements to an existing product. The principles of Life Cycle Assessment (LCA) outlined in ISO 14040 shall be used to identify the primary loads of a product. Environmental innovation may be demonstrated in one of two ways:

- The product shall exhibit an environmental load reduction of at least 30% on a primary environmental load during the product life cycle or,
- The product shall exhibit environmental load reductions of at least 20% in each of the top four primary environmental loads of the product life cycle via a comparative analysis with products meeting the same consumption need and
- Environmental load reductions must not result in an increase in environmental loads at a different stage along the product life cycle (i.e., non-transference). Exceptions may be granted if a life cycle assessment of the product clearly demonstrates that a transferred load is insignificant compared to the major load reductions outlined above.

Applicable environmental loads are only those that can be determined or influenced by the product designer or manufacturer. Loads that cannot be influenced by the manufacturer are not considered under this Standard.

3.3 Material Requirements

3.3.1 Chemical Declaration:

All chemicals used in the production process by the applicant and any supplied materials that form part of the final product shall be covered by declarations from suppliers stating that they do not contain, in concentrations greater than 0,10 % (weight by weight), any prohibited substances or materials. No derogation from this requirement shall be granted.

3.3.2 Carcinogenic Properties:

Products shall not contain carcinogenic substances in IARC categories 1 or 2A as classed by the International Agency for Research on Cancer - https://monographs.iarc.who.int/monographs-available/ at levels which expose the user to a maximum level of one twentieth of the allowable limit determined by applicable standards or legislation.

3.3.3 Hazardous and Prohibited Materials:

This section covers chemicals and substances used in the production of pulp and paper, and chemicals used in the manufacturing process of the final product.

3.3.3.1 Hazardous Materials

Substances or mixtures classified with risk phrases and hazard statements listed below may not be used in the pulp and paper production process or the production of the final product (where applicable); or be present in the final product.

The product, and any component articles therein, ***shall not contain*** substances or mixtures in concentrations greater than 0,10 % (weight by weight) that are assigned any of the following hazard classes, categories and associated hazard statement codes, in accordance with Regulation (EC) No 1272/2008:

- **Group 1 hazards**: Category 1A or 1B carcinogenic, mutagenic and/or toxic for reproduction (CMR): H340, H350, H350i, H360, H360F, H360D, H360FD, H360Fd, H360Df.
- **Group 2 hazards**: Category 2 CMR: H341, H351, H361, H361f, H361d, H361fd, H362; Category 1 aquatic toxicity: H400, H410; Category 1 and 2 acute toxicities: H300, H310, H330; Category 1 aspiration toxicity: H304; Category 1 specific target organ toxicity (STOT): H370, H372; Category 1 skin sensitiser: H317 (6).
- **Group 3 hazards**: Category 2, 3 and 4 aquatic toxicities: H411, H412, H413; Category 3 acute toxicity: H301, H311, H331; Category 2 STOT: H371, H373.

The use of substances or mixtures that are chemically modified during the production process, so that any relevant hazard for which the substance or mixture has been classified under Regulation (EC) No 1272/2008 no longer applies, shall be exempted from the above requirement.

The following exceptions may be permitted subject to full disclosure and accompanied by the relevant CAS and MSDS documentation:

- Biocides excepted from ban on ecotoxic substances;
- Foam inhibitors, cleaning, washing and de-inking chemicals excepted from ban on ecotoxic substances;
- Peracetic acid (bleaching agent);
- Chemicals that are 100% inorganic (e.g. NaOH);
- Cationic polymers and dyes excepted from the ban on ecotoxic substances if the classification is due to the cationic charge;
- Chemicals with a consumption of less than 0.05 kg/tonne pulp product, toluene for use in rotogravure printing processes.

3.3.3.2 The following substances or preparations *shall not be present* in any inks, dyes, toners, adhesives or cleaning agents used in the printing process or related sub-processes to produce the tissue paper product:

- **alkyl phenol ethoxylates** and their derivatives that may produce alkyl phenols by degradation;
- Elemental **Chlorine** and Chlorine Gas may not be used as a bleaching agent;
- **halogenated solvents** that at the time of application are classified with any of the hazard classes listed in point 3.3.3;
- **phthalates** that at the time of application have been assigned reproductive toxicity hazard classes (category 1A, 1B or 2) and one or more of the following associated hazard statement codes: H360F, H360D, H360FD, H360Fd, H360Df, H361, H361f, H361d, H361fd or H362 in accordance with Regulation (EC) No 1272/2008.
- *To be read in conjunction with part 3.3.3.7.*

The levels of ionic impurities in the dyes and pigments used must not exceed the following: Ag 100 ppm; As 50 ppm; Ba 100 ppm; Cd 20 ppm; Co 500 ppm; Cr 100 ppm; Cu 250 ppm; Fe 2,500 ppm; Hg 4 ppm; Mn 1,000 ppm; Ni 200 ppm; Pb 100 ppm; Se 20 ppm; Sb 50 ppm; Zn 1,500 ppm.

3.3.3.3 Dyes and Pigments

The following azo dyes or pigments which may release one of the amines listed below must not be used.

Substance	CAS number
• 2,4,5-trimethylaniline	137-17-7
• 2,4-diaminoanisol	615-05-4
• 2,4-diaminotoluene	95-80-7
• 2,4-xylidine	87-62-7
• 2,6-xylidine	95-68-1
• 2-amino-4-nitrotoluene	99-55-8
• 2-naphthylamine	91-59-8
• 3,3'-dichlorobenzidine	91-94-1
• 3,3'-dimethoxybenzidine	119-90-4
• 3,3'-dimethyl-4,4'-diaminodiphenylmethane	838-88-0
• 3,3'-dimethylbenzidine	119-93-7
• 4,4'-diaminodiphenylmethane	101-77-9
• 4,4'-methylene-bis-(2-chloraniline)	101-14-4
• 4,4'-oxydianiline	101-80-4
• 4,4'-thiodianiline	139-65-1
• 4-aminoazobenzene	60-09-3
• 4-aminobiphenyl	92-67-1
• 4-chloro-o-toluidine	95-69-2
• Benzidine	92-87-5
• o-amino-azotoluene	97-56-3
• o-anisidine	90-04-0
• o-toluidine	95-53-4
• p-chloroaniline	106-47-8
• p-cresidine	120-71-8

An indicative list of dyes that may cleave to the restricted amines is listed in APPENDIX A and can be used as a guide to dyes that should not be used.

3.3.3.4 Toxins or Pollutants:

Products containing or using environmental toxins or pollutants in the finished product or manufacturing process shall have a policy in place to test environmentally preferable alternatives that claim to provide equal fitness for purpose. Manufacturers must commit to adopting suitable alternatives if they are found and fitness for purpose is verified. This requirement includes but is not limited to:

- Elemental halogen use (e.g., chlorine bleaching).
- Chelating agents or surfactants that are not readily biodegradable.
- CFC, HCFC, HFC, methylene chloride or other halogenated organic compounds (including halogenated organic flame retardants).
- Ozone depleting substances.
- The phthalates DEHP, DBP, BBP or DAP.
- Polybrominated biphenyl ethers (e.g., flame retardants).
- Persistent environmental pollutants, heavy metals or radionuclides at levels greater than half the allowable limit set by relevant national standards or legislation.

3.3.3.5 Cleaning agents

Cleaning agents used for routine cleaning operations in printing processes and/or sub-processes shall:

- not contain solvents with a flashpoint < 60°C in concentrations > 0,10 % (by weight);
- not contain benzene in concentrations > 0,10 % (by weight);
- not contain toluene or xylene in concentrations > 1,0 % (by weight);
- not contain aromatic hydrocarbons (≥ C9) in concentrations > 0,10 % (by weight);

- not contain any ingredients based on halogenated hydrocarbons, terpenes, n-hexane, nonylphenols, N-methyl-2-pyrrolidone or 2-butoxyethanol in concentrations > 0,10 % (by weight).

These restrictions do not apply to cleaning agents used in special formulations that are only occasionally used, such as dried ink removers and blanket revivers. The restriction on toluene does not apply to cleaning agents used in rotogravure printing processes.

3.3.3.6 Biocidal Treatment

Tissue Paper products shall not be treated with any biocidal products, including those of type 7 (film preservatives) and of type 9 (fibre, leather, rubber and polymerised materials preservatives). Only in-can preservatives (i.e. biocidal product type 6: preservatives for products during storage) present in printing inks, varnishes, lacquers and any other formulations used during the production processes and preservatives used for liquid cooling and processing systems (i.e. biocidal product type 11) shall be permitted, subject to their:

- having been approved by Regulation (EU) No 528/2012 of the European Parliament and of the Council (7) for product type 6 or product type 11 uses, as appropriate, or
- being under examination pending a decision on approval by Regulation (EU) No 528/2012 for product type 6 or product type 11 uses, as appropriate.

If any biocidal active substance meeting the above condition(s) is assigned the hazard statement code H410 or H411(hazardous to the aquatic environment, chronic hazards, category 1 or 2), its use shall only be permitted if the bioaccumulation potential (log Pow octanol/water partition coefficient) is < 3,0 or if the bioconcentration factor (BCF) is ≤ 100.

3.3.3.7 Printing inks, Toners and Varnishes

Note: for the purpose of this criterion and unless stated otherwise, the restrictions equate to the non-presence of the hazardous substance or mixture in concentrations exceeding 0,10 % (by weight) in the ink, toner or varnish formulation.

The following restrictions shall apply to all substances or mixtures used in printing inks, toners and varnishes for use in the printing process or sub-processes used to produce ECA Ecolabel printed paper, stationery paper or paper carrier bag products:

- no substances or mixtures with assigned carcinogenic, mutagenic and/or reproductive toxicity hazard classes (category 1A, 1B or 2) and one or more of the following hazard statement codes: H340, H350, H350i, H360, H360F, H360D, H360FD, H360Fd, H360Df, shall be used;
- no substances or mixtures with assigned acute toxicity (oral, dermal, inhalation) hazard classes (category 1 or 2) and one or more of the following hazard statement codes: H300, H310, H330, shall be used;
- no substances or mixtures with assigned acute toxicity (oral, dermal) hazard classes (category 3) and one or more of the following hazard statement codes: H301, H311, shall be used;
- no substances or mixtures with assigned specific target organ toxicity (single or repeated exposure) hazard classes (category 1) and one or more of the following hazard statement codes: H370, H372, shall be used;
- no pigments or additives based on antimony, arsenic, cadmium, chromium (VI), lead, mercury, selenium, cobalt or any compounds thereof shall be used and only traces of those metals up to 0,010 % (by weight) as impurities shall be permitted.
- no azo dyes, which by reductive cleavage of one or more azo groups may release one or more of the aromatic amines listed as a prohibited substance may be used;
- the following solvents: 2-Methoxyethanol, 2-Ethoxyethanol, 2-Methoxyethyl acetate, 2-Ethoxyethyl acetate, 2-Nitropropane and Methanol shall not be used;
- the following plasticisers: chlorinated naphthalenes, chlorinated paraffins, monocresyl phosphate, tricresyl phosphate and monocresyl diphenyl phosphate shall not be used;
- diaminostilbene and its derivatives, 2,4-Dimethyl-6-tert-butylphenol, 4,4'-Bis(dimethylamino) benzophenone (Michler's Ketone) and Hexachlorocyclohexane shall not be used.

3.3.3.8 Surfactants, Washing and Cleaning Agents and Foam Inhibitors

- Solvents, washing agents and/or cleaning chemicals used in the cleaning of production/manufacturing equipment and/or used for printing must not contain alkylphenol ethoxylates (APEOs) or other alkylphenol derivatives, classified halogenated solvents and/or phthalates (that at the time of application are classified with risk phrases H360, H361).
- Where surfactants are used for de-inking recycled paper input, these surfactants shall be readily biodegradable.
- None of the constituent substances that have a foam inhibiting or foam retarding effect in foam inhibitors/defoamers must be classified as environmentally hazardous in accordance with Table 1. As an alternative, foam inhibitors/defoamers for which 95 % by weight of the constituent substances with a foam inhibiting or foam retarding effect are either readily or ultimately biodegradable, may be used. Foam inhibitors/defoamers that are destroyed in chemical recycling are excepted from this requirement.

3.3.3.9 Wet Strength Agents

The sum of the chloro-organic substances epichlorohydrin (ECH), 1,3-dichloro-2-propanol (DCP) and 3-monochloro-1,2-propanediol (MCPD) must not comprise more than 7000 ppm (0.7 %) of the wet strength agents.

Toilet paper must not possess wet strength. The toilet paper is considered to be strong when wet if its relative wet tensile strength is greater than 10% in the machine direction. The test must be conducted on the converted product. Relative wet tensile strength is measured as the quotient between wet and dry tensile strength. If the tensile strength of the wet tissue paper is so low that it cannot be measured the paper is not considered to have wet strength

3.3.3.10 Other Chemical Additives

Any other additives, such as lotions, fragrances or softeners, added to sanitary paper products must meet the relevant criteria in the ECSA Personal Care Products standard (ECSA-C02-2017).

3.3.3.11 Additives in the Finished Product

The following additives are not permitted in the finished tissue product (including cores):

- **Perfumes**
  Perfumes and other fragrances are not permitted in the tissue product.
  Essential oils or plant extracts where the function is to provide scent are not permitted.
- **Cosmetic and body care additives** (e.g. lotion)
  Cosmetic or body care preparations and other scenting substances whose main function is other than to give the tissue product a scent are not permitted.
- **Cleaning agents**
  Cleaning agents designed for surface cleaning (e.g. floor cleaning) are not permitted in the tissue product.

3.3.3.12 Tissue paper and tissue product in contact with food

- Tissue paper kitchen towels, napkins and tissue product marketed for use in contact with food must comply with ISO 22002-4 2013 Food Management System Standard on materials and articles intended to come into contact with food shall be labelled as such

3.3.4 Fibre Input Requirements

The fibre input material in the paper component may be recycled or virgin fibre. All fibre sources must fulfil one or a combination of the following requirements.

3.3.4.1 Fibre Raw Materials

i. Virgin wood fibre:

All virgin fibre input from native forests must be sourced from forests that are certified under FSC or equivalent certification; and

All virgin wood fibre must be covered by valid sustainable forest management and chain of custody certificates issued by an independent third-party certification scheme such as FSC or equivalent.

Where mixing of certified material, recycled materials and uncertified material in a product or product line takes place, at least 50 % of the fibre in the finished product must be from either plantations or forests that are certified. Any uncertified material must be covered by a verification system which ensures that it is legally sourced and meets any other requirement of the certification scheme with respect to uncertified material. The certification bodies issuing forest and/or chain of custody certificates shall be accredited/recognised by that certification scheme.

ii. Recycled fibre:
Fibre material is 100% derived from recycled sources with a minimum 50 % from post-consumer sources.

iii. Waste fibre:
Fibre material is 100 % derived from pre-consumer waste such as sawdust/woodchips and waste wood from wood processing operations, forest harvesting waste, untreated demolition wood, agricultural waste, sugarcane bagasse etc.

All waste wood from native forests must be sources from forests that are certified under a forest certification scheme.

iv. Bamboo:
If more than 20 % of the overall fibre material is derived from bamboo, the following conditions shall be met:

- 50 % of virgin bamboo fibre used in the product must come from plantations or forests certified as sustainably managed under a certification scheme (FSC, or equivalent); OR
- All bamboo fibre used in the product must originate from certified organic plantations; OR
- It must be shown that no bamboo fibre is derived from illegal sources or protected areas, or areas that are under investigation as to their protection status; or areas where ownership or rights of exploitation are unclear; or bamboo species that appear on the Convention on International Trade in Endangered Species (CITES) list.

v. Other virgin fibre (non-wood, non-bamboo):
100 % of other virgin (non-wood, non-bamboo) plant-based fibre originates from certified organic plantations (e.g. for cotton, hemp); or it can be demonstrated that a procedure is in place for the procurement of sustainable fibre raw materials, and that all fibre raw materials are traceable, and not derived from illegal sources, or protected areas, or areas that are under investigation as to their protection status; or areas where ownership or rights of exploitation are unclear, and that fibre management does not harm natural woodland, biodiversity, special ecosystems and important ecological functions.

- Starch products shall not be derived from genetically modified material, e.g. certain potato and maize starches.
- Products made from recycled fibres or mixtures of recycled and virgin fibres shall not contain more than:
  - Formaldehyde: 1 mg/dm2 (Test Method: EN 1541:2001)
  - Glyoxal: 1.5 mg/dm2 (Test Method: DIN 54603)
  - PCP: 0.15 mg/kg (Test Method: ISO 15320:2011)
  - PCB: 0.05 mg/kg (Test Method: ISO 15318:1999)
- All tissue products must fulfil the following requirements:
  - Slimicides and antimicrobic substances: No growth retardance of micro-organisms
  - Dyes: No bleeding

3.3.5 Energy, Water and Waste Management System

The site where the ECA Ecolabel product is manufactured or produced shall have established Appropriate management systems addressing all energy and water consuming devices (including machinery, lighting, air conditioning, cooling), actual volumes used and waste created and recycled during the manufacturing process. Such systems shall address:

Energy: The energy management system shall include measures for the improvement of energy efficiency and shall include information on at least the following procedures:

- establishing and implementing an energy data collection plan in order to identify key energy performance;
- analysis of energy consumption that includes a list of energy consuming systems, processes and facilities;
- identification of measures for more efficient use of energy;
- continuous improvement objectives and targets relating to the reduction of energy consumption.

Water: Water management system shall include measures for the implementation of water conservation and reuse and shall address at least the following:

- total water use; and
- initiatives taken to reduce water use and improve water efficiency.

Waste: The waste management system shall document and address the following:

- the handling, collection, separation and use of recyclable materials from the waste stream;
- the recovery of materials for other uses, such as incineration for raising process steam or heating, or agricultural use;
- the handling, collection, separation and disposal of hazardous waste, as defined by the relevant local and national regulatory authorities.

3.3.6 Emissions to Air and Water

Emissions to air and/or water from the production of pulp and paper production must be specified in terms of emissions points scores for PCOD, PP, PS, and PNOx according to the following. Water emissions relate to COD and P (phosphorus), and air emissions relate to S and NOx.

	Emissions (kg/ADT)			
Pulp Grade/ Paper/ Board	**COD**reference	**S**reference	**NOX**reference	Preference
Bleached Chemical Pulp (other than sulphite)	18	1.5	2.0	0.045*
Bleached Chemical Pulp (sulphite)	25	1.5	2.0	0.045
Unbleached chemical pulp	10	1.5	2.0	0.04
CTMP	15	0.2	0.3	0.01
TMP/groundwood pulp	3	0.2	0.3	0.01
Recycled fibre pulp	4	0.2	0.3	0.01
Tissue paper/paper product	2	0.3	0.5	0.0

* Exception from this level, up to a level of 0.1 may be given where it can be demonstrated that the higher level of P is due to P naturally occurring in the wood pulp.

3.3.7 Packaging Requirements and Restrictions

- Outer packaging must not be impregnated, labelled, coated or otherwise treated in a manner, which would prevent recycling (i.e. PVC sleeves, metallic labels).
- Packaging must comply with at least one of the following:
  - Each material constituting >20% by weight of the total primary and secondary packaging used, must contain at least 50% recycled content by weight;
  - Each material constituting >20% by weight of the total primary and secondary packaging used, must be derived from plant-based materials (e.g. PLA plastics); or
  - Each separable item constituting >20% by weight of the total primary and secondary packaging, must be recyclable in South Africa.
  - Paper and cardboard packaging must be either certified under recognised forest certification Scheme (e.g. FSC) or contain at least 30% recycled content by weight.
  - Material used for the transport of products (tertiary packaging) and whose disposal is not the

responsibility of the end consumer may be excepted from the above requirements if they are re-used by the applicant, or are recyclable in specialist recycling facilities.

- Chlorinated or halogenated plastics must not be used in product packaging.
- Used packaging shall be capable of being recycled by local recycling systems.
- The manufacturer must provide written information to the consumer, either on the product packaging or in a separate document supplied with the product, clearly stating:
  - The intended use of the product.
  - Instructions for correct use and storage so as to maximise the product lifetime and energy efficiency.
- Recycling instructions, if applicable. Product stewardship arrangements, recycling or preferred disposal instructions for the product end-of-life.

3.3.8 Environmental Claims

Public claims made by the licence applicant / holder regarding a product's environmental performance that are beyond the scope of this standard (other than ECA certified content) shall be independently verified as compliant with ISO 14021: Environmental Labels and Declarations – Self Declared Environmental Claims (Type II Environmental Labelling) requirements.

No alternate or supplementary Type 2 or Type 3 logo shall be used in conjunction with the ECA Type 1 ecolabel awarded under this standard. Also refer to the ECA Scheme Rules for the Use of the Eco-Choice Africa Label.

4 COMPLIANCE TO ENVIRONMENTAL REGULATIONS

The applicant is required to comply with all relevant environmental legislation at the Local, Regional and International levels, if these have been issued. An applicant's compliance with these criteria may be established by undertaking a series of random checks; and/or by gathering samples of applicant operational procedures and documents from approved assessors as evidence to support compliance during the verification.

Where an applicant is from an overseas jurisdiction, that jurisdiction's environmental regulations shall apply. Where the applicant is subject to a guilty verdict by a legally constituted court in the last 24 months on the basis of a breach of any environmental legislation or permits, there must be evidence of corrective action.

5 COMPLIANCE TO LABOUR, ANTI-DISCRIMINATION AND SAFETY REGULATIONS

The applicant shall demonstrate that all employees are protected in terms of the Basic Conditions of Employment Act (Act 75; 1997) and Amendments (2002).

The applicant shall demonstrate general compliance to the terms of the Labour Relations Act (Act 66; 1995); the Occupational, Health and Safety Act (Act 85; 1993) and any other legislation related to anti-discrimination; sexism; child labour or applicable labour standards. Where the applicant is subject to a breach order by a government agency, or a guilty verdict by a South African Court within the last 24 months, there must be evidence of corrective action.

Where the applicant is from a foreign jurisdiction, the applicant shall demonstrate compliance to that jurisdiction's anti-discrimination, occupational health and safety, and workers' compensations regulations. Where the applicant is subject to a breach order by a government agency, or a guilty verdict by a legal court in their respective country within the last 24 months on the basis of a breach of anti-discrimination, occupational health and safety, and workers' compensation regulations, there must be evidence of corrective action.

The applicant's compliance with these criteria may be established by undertaking a series of random checks; gathering samples of applicant operational procedures and documents from approved assessors; and/or by providing a self-declaration document signed by an executive officer of the applicant organisation as evidence to support compliance during verification.

6 COMPLIANCE TESTING

6.1 Audit Methodology

Conformance with this standard shall be demonstrated by undertaking an assessment under the above criteria by an approved assessor, following the certification and verification procedures detailed in the Eco-Choice Ecolabel Programme Quality Management System, which is based upon the environmental auditing requirements of ISO 14011 and 14012.

6.2 Assessor Competency

The Eco-Choice Ecolabel Program classifies approved assessors as:

a. Assessors registered by Eco-Choice Africa as environmental professionals that hold expertise relevant for an assessment, and who have undertaken training in the procedures of the Eco-Choice Ecolabel Program; **or**
b. Environmental auditors accredited with SANAS.

6.3 Suitable Sources

Audit evidence should be of such a quality and quantity that competent environmental auditors, working independently of each other, will reach similar audit findings from evaluation of the same audit evidence against the same audit criteria.

Suitable sources of information to establish compliance may be, but are not limited to:

a. Technical specification of the product.
b. Obvious characteristics of the product under examination.
c. Scientific test results and reports.
d. Environmental management system and audit reports and results.
e. Life-cycle assessment of each stage of the product life-cycle via a physical audit and examination.
f. Life-cycle assessment via scientific testing.
g. A statement of confirmation by an executive officer.
h. An assessment of company or government records.
i. Other material that can be considered objective evidence.

6.4 Laboratory Testing

The Applicant is required to evaluate product performance against the criteria of the applicable standard on an annual basis. The test results should be presented in a prescribed manner or from a laboratory acceptable to Eco-Choice Ecolabel Programme.

Where an independent, registered laboratory for the testing of this standard is not available or operational, then the test results may be conducted by an in-house laboratory against the applicable testing protocols together with an affidavit confirming compliance with this standard signed and approved by the CEO or equivalent of the manufacturing organisation. ECA reserves the right to request additional testing or re-testing of all products registered under this label.

If test results or environmental auditing results are not available, and/or there is insufficient data to establish full compliance with the criteria required by this standard, then certification cannot be awarded.