

'EU Flower' eco-label discriminates against gravure

Based on a directive, the EU is establishing eco-labels for all kind of products. As reported, the EU Commission has now started a project to introduce an eco-label for printed products, officially named the "EU Flower eco-label for printed products". In charge of the process is Directorate G "Sustainable Development and Integration" of the Directorate General (DG) for the Environment, which bears the political responsibility for this project.

To prepare the eco-label and the qualifying criteria, DG Environment has commissioned SIS Miljömärkning AB (SIS Ecolabelling) of Stockholm. This organisation developed, runs and licences the "Nordic Swan", an eco-label system mainly for paper products. SIS Miljömärkning AB finances its activities through Nordic Swan certification. The company is at the same time the "Swedish Competent Body" and represents Sweden in the relevant EU bodies. The final decision on the eco-label will be made by the European Eco-labelling Board, in which all EU member states are represented.

The scope of the draft for the eco-label worked out by SIS is very vague and has been changed several times. It covers any printed product based on paper, paper board and paper based substrate with the exception of packaging materials and tissue products. The draft mentions, as examples which are covered, books, newspapers, magazines, catalogues, binders, folders, pads, booklets and forms.

The eco-label was discussed at the 2004 meetings of the ERA EH&S Commission as well as at the meetings of the ERA Toluene Task Force. ERA raised its concerns in the second EU Ad Hoc Working Group Meeting on this item as well as in personal talks with Mr. Herbert Aichinger (Head of Unit G.2

Environment & Industry), responsible in DG Environment for eco-labelling. The heart of the message of ERA was: although the gravure industry supports the principles of sustainable development and has implemented a very high level of health and safety protection at work, the draft eco-label for printed products is not seen as any improvement for the environment. Moreover, it is unnecessary as it will only cause bureaucracy and costs.

The proposed criteria are not only technically unattainable for gravure printers, but according to the present draft, gravure printed products could even not apply for the eco-label "award". In other words: gravure is explicitly excluded from the eco-label. The rules of the draft criteria (also in the latest version presented on 9 November 2004) state that printing inks must not be labelled with the R 63. This means that toluene is excluded from being an accepted ink solvent. The consequence is that publication gravure is excluded in general. It does not help that in the latest version of the draft criteria, toluene is accepted as a washing agent in gravure.

The proposed exclusion of dangerous substances with the risk phrase R50/53 (Very toxic to aquatic organisms, may cause long-term adverse effects in the aquatic environment) from the production process is also unachievable in gravure printing. The use of such substances in gravure is already completely controlled, therefore a ban would have no impact on the health and safety for the employees or customers, nor would there be an environmental benefit. In particular, there is no emission of such substances to water.

Even if the "R 63 clause" and other unattainable demands are deleted, the remaining draft criteria are hard to accept for the industry. For example, whereas all existing EU eco-labels are product-orientated (with one exception), the draft EU eco-label for printed product is production-oriented, i.e. process-oriented. ERA is convinced that much better instruments exist to improve environmentally friendly production in gravure printing plants – such as ISO 14001 ff, EMAS, BAT, and the BREF for surface treatment with solvents which is under development.

Besides this, the planned eco-label for printed products will not engage the consumer, as magazines, newspapers and books are bought for their content. No readers will buy a magazine because it bears an eco-label. They



read the magazines that 'speak' to them. The customers of the printers are the publishers, who already have a strong interest in environmentally friendly production. And their experts would not be satisfied with a simple label: they already today ask for specific and detailed information on production conditions, raw materials used, recyclability of the ordered product and environmental impact of the whole process.

As none of the arguments formally raised by ERA together with the other organisations such as Intergraf, EuPIA (the European Printing Ink Association), ENPA (the European Newspapers Publishers Association) and FAEP (the European Federation of Magazine Publishers) were considered at all by SIS Miljömärkning in their process, ERA and Intergraf decided to step back from further technical consultations with SIS and did not attend the third Ad Hoc Working Group meeting on 9 November 2004. The other associations referred to above also withdrew from further technical discussions shortly after the third Ad Hoc Working Group meeting.

After this important political signal, the Director of Directorate G "Sustainable Development and Integration", Timo Mäkelä, hinted that there will be some move in the further process towards a more constructive position by the EU and SIS Miljömärkning. In an informal meeting arranged by the Brussels office of UPM and attended by ERA Secretary General James Siever and representatives of CEPI (the Confederation of the European Paper Industry) and the magazine publishers, Mr. Mäkelä pointed out that "the concerns of the rotogravure sector would definitely be taken into account". He further stated his intention to change the way of co-operation with the industry in this matter. And to initiate better communication, he will call a meeting early in 2005 with the EU, the Swedish institute SIS Miljömärkning and the relevant industry experts. ERA will attend this meeting.

As mentioned above the final decision on the eco-label will be made by the European Eco-labelling Board where all EU member states are represented by their Competent Bodies. A list of all national Competent Bodies and the responsible persons is available from the ERA EH&S Coordinator. The ERA Environment, Health and Safety Commission recommends that ERA member companies should approach their national Competent Body to make them aware of their concerns about the EU eco-label for printed products.

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