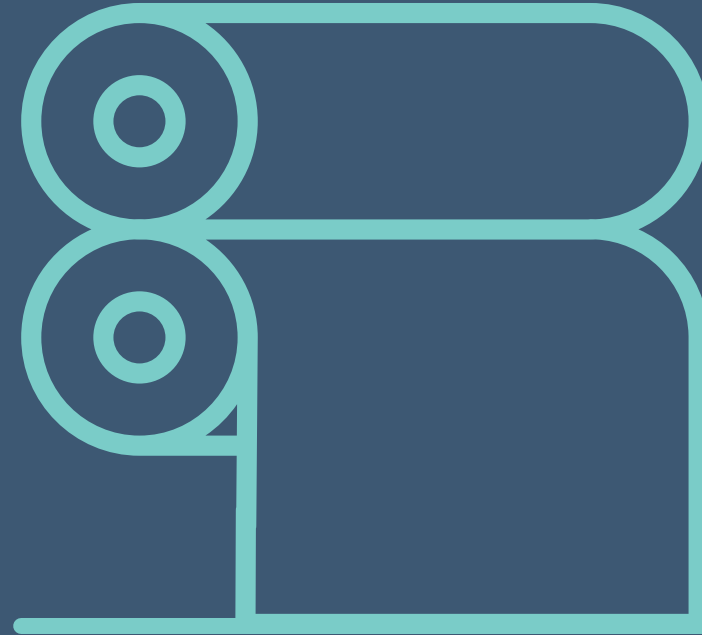




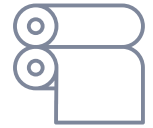
Rialtas na hÉireann
Government of Ireland



IRISH GPP CRITERIA:

PAPER PRODUCTS & PRINTING SERVICES

IRISH GPP CRITERIA: PAPER PRODUCTS & PRINTING SERVICES



This document sets out the proposed core and comprehensive GPP criteria for application in the purchase of paper products and printing services by Irish public bodies. For the purposes of these criteria, the category is defined as including the following products and services:

- Graphic and copying paper
- Envelopes and stationery paper products (e.g. notebooks, writing pads, drawing books)
- Printed paper products (e.g. forms, leaflets/brochures, annual reports, labels, diaries, business cards, calendars, posters, books)
- Printing services

NOTE: Criteria for the purchase of tissue paper (kitchen and toilet tissue) are included in the Irish GPP criteria for Cleaning and Catering Services.

The criteria have been developed based on the draft EU GPP criteria for graphic paper prepared in 2016, review of relevant ecolabel criteria and other national GPP criteria for these product groups, relevant Irish and European legislation and policy, and a consultation with a number of Irish public bodies. Further context for the development of the criteria, and advice on how they can be applied and verified within tender procedures, is given in the accompanying EPA guidance document. For an overview of the sector, GPP approach and examples of real tenders, please refer to *Module 7.2 of the GPP Training Toolkit*.

A key consideration for the procurement of paper products is how demand can be effectively managed to avoid any unnecessary usage. Although digitisation has led to reduced demand for printing paper, demand for paper products as packaging has increased. Specific techniques for reducing demand for printing in offices are discussed in *this document* from the World Wildlife Foundation. For an overview of Needs Assessment as part of the procurement process, please refer to the EPA guidance document and to *Module 4 of the GPP Training Toolkit*.

These criteria have been updated as of April 2024, in line with policy and legislative changes

WHAT DO THE CRITERIA COVER?

SUPPLY OF PAPER PRODUCTS & PROVISION OF PRINTING SERVICES WITH REDUCED ENVIRONMENTAL IMPACT

A merged cell indicates the same criteria apply at the core and comprehensive levels. The bracketed codes are for the purposes of completing eForms data on Green Public Procurement (BT-774).

GPP IMPACT CODES FOR BT-774 IN EFORMS	
biodiv-eco	The protection and restoration of biodiversity and ecosystems
circ-econ	The transition to a circular economy
clim-adapt	Climate change adaptation
clim-mitig	Climate change mitigation
other	Other
pollu-prev	Pollution prevention and control
water-mar	The sustainable use and protection of water and marine resources
TARGETS FROM BUYING GREENER	T7: From May 2024, where office paper for printing and photocopying must be procured, 100% of the paper must be recycled paper.
RELEVANT IRISH GPP CRITERIA	<p>SECTION A GRAPHIC PAPER: TS1. 100% recycled paper</p> <p>SECTION B PRINTED & CONVERTED PAPER PRODUCTS: TS1. 100% recycled paper products</p> <p>SECTION C PRINTING SERVICES: TS1. 100% recycled paper</p>

TOPIC	CORE GPP CRITERIA	COMPREHENSIVE GPP CRITERIA
A. GRAPHIC PAPER (PRINTING & COPYING PAPER)	TS1. 100% recycled paper (biodiv-eco; circ-econ; clim-mitig)	
	TS2. Legal and sustainable sourcing of virgin fibres for pulp production (biodiv-eco; circ-econ; clim-mitig; other)	
		TS3. EU Ecolabel criteria – Graphic paper (biodiv-eco; circ-econ; clim-mitig; other; pollu-prev; water-mar)
	AC1. EU Ecolabel criteria – Graphic paper (biodiv-eco; circ-econ; clim-mitig; other; pollu-prev; water-mar)	
	CPC1. Due diligence obligations (biodiv-eco; clim-mitig; other)	
B. PRINTED & CONVERTED PAPER PRODUCTS (INCLUDING ENVELOPES & STATIONERY PRODUCTS)	TS1. 100% recycled paper products (biodiv-eco; circ-econ; clim-mitig)	
	TS2. Legal and sustainable sourcing of virgin fibres for pulp production (biodiv-eco; circ-econ; clim-mitig; other)	
		TS3. EU Ecolabel criteria – Printed paper and stationery products (biodiv-eco; circ-econ; clim-mitig; other; pollu-prev; water-mar)
	AC1. EU Ecolabel criteria – Graphic paper (biodiv-eco; circ-econ; clim-mitig; other; pollu-prev; water-mar)	
	AC2. EU Ecolabel criteria – Printed paper and stationery products (biodiv-eco; circ-econ; clim-mitig; other; pollu-prev; water-mar)	
	CPC1. Due diligence obligations (biodiv-eco; clim-mitig; other)	

TOPIC	CORE GPP CRITERIA	COMPREHENSIVE GPP CRITERIA
C. PRINTED SERVICES	SC1. Environmental Technical Capacity (biodiv-eco; circ-econ; clim-mitig; other; pollu-prev; water-mar)	
	TS1. 100% recycled paper (biodiv-eco; circ-econ; clim-mitig)	
	TS2. Legal and sustainable sourcing of virgin fibres for pulp production (biodiv-eco; circ-econ; clim-mitig; other)	
	TS3. Environmental management measures (biodiv-eco; circ-econ; clim-mitig; other; pollu-prev; water-mar)	
		TS4. EU Ecolabel criteria – Graphic paper (biodiv-eco; circ-econ; clim-mitig; other; pollu-prev; water-mar)
		TS5. EU Ecolabel criteria – Printed paper and stationery products (biodiv-eco; circ-econ; clim-mitig; other; pollu-prev; water-mar)
	AC1. EU Ecolabel criteria – Graphic paper (biodiv-eco; circ-econ; clim-mitig; other; pollu-prev; water-mar)	
	AC2. EU Ecolabel criteria – Printed paper and stationery products (biodiv-eco; circ-econ; clim-mitig; other; pollu-prev; water-mar)	
	CPC1. Due diligence obligations (biodiv-eco; clim-mitig; other)	
	CPC2. Environmental management measures (biodiv-eco; circ-econ; clim-mitig; other; pollu-prev; water-mar)	

IRISH GPP CRITERIA – HOW TO READ THE TEMPLATE

Scope	Defines the products and services to which the criteria apply.
Exclusions	Identifies any related products or services which are not covered by the criteria.
References	The primary sources consulted to develop the Irish GPP criteria.
Eco-labels	Type I eco-labels and other labels which address relevant environmental characteristics of the products or services and may be used either to define GPP criteria, verify compliance or both. Labels with equivalent criteria must also be accepted.
Legislation and Standards	Relevant EU and Irish legislation which applies within the sector and International, European or Irish standards which may be referenced in technical specifications (accompanied by the words 'or equivalent'.)
Notes	Practical tips and advice on applying the criteria, and explanations of the environmental impacts being addressed.
Core Criteria	Criteria which can be applied by any Irish public body and which are expected to have minimal effect on costs or verification effort.
Comprehensive Criteria	Criteria which go beyond the core requirements to target enhanced environmental performance and may imply some additional costs or verification effort.
Selection Criteria	Criteria which operators must meet in order to be eligible for tender submission (in a two-stage procedure) or award (in an open procedure).
Specification	Minimum requirements which all tenders must meet. Where multiple specifications are included in the criteria, these may be used together (recommended) or separately.
Specification – Variant	An optional alternative to the specification, which allows alternative solutions to be considered.
Award Criteria	Criteria which target environmental performance beyond the minimum requirements of the specification. These may be qualitative or quantitative in nature and must be weighted for evaluation. It is up to the contracting authority to determine an appropriate weighting based on its priorities and the totality of criteria which it is applying in a specific tender.
Contract Performance Clauses	Clauses which can be inserted into contracts in order to manage environmental aspects and promote progressive improvements in delivery.

SCOPE, REFERENCES, LEGISLATION & CERTIFICATIONS/LABELS

IN SCOPE	<ul style="list-style-type: none"> • Graphic paper, meaning sheets or reels of not converted, unprinted blank paper or board, whether plain or coloured, made from pulp and fit to be used for writing, printing or conversion purposes. • Printed paper products that consist of at least 90% by weight of paper, paperboard or paper-based substrates. • Books, catalogues, booklets or forms that consist of at least 80% by weight of paper or paperboard or paper-based substrates. • Envelopes that consist of at least 90 % by weight of paper, paperboard or paper-based substrates. • Paper carrier bags, including wrapping paper, that consist of 100 % by weight of paper, paperboard or paper-based substrates. • Stationery paper products, including filing products, that consist of at least 70 % by weight of paper, paperboard or paper based substrates, except for suspension files and folders with metal fastener to which the threshold does not apply. • Printing services which include the supply of any of the above products.
NOT IN SCOPE	<ul style="list-style-type: none"> • Tissue paper products such as kitchen and toilet paper (Refer to Irish GPP criteria for catering services and cleaning services). • Envelopes, stationery or printed paper products consisting of less than the above stated percentages by weight of paper. • Packaging, labels, food contact materials, fragranced products or polyvinyl chloride (PVC).
LEGISLATION & STANDARDS	<ul style="list-style-type: none"> • Regulation (EU) 2023/1115 (<i>EU Deforestation-free Products Regulation</i>) • Regulation (EU) 995/2010 (<i>EU Timber Regulation</i>), Implementing Regulation (EU) 607/2012 and SI No 316/2014 • Council Regulation (EC) 2173/2005 <i>on the establishment of a FLEGT licensing scheme</i> as implemented by SI No 251/2015 • Convention on International Trade in Endangered Species of Wild Fauna and Flora (<i>CITES</i>) • Commission Decision (EU) 2019/70 <i>establishing the EU Ecolabel criteria for graphic paper, tissue paper and tissue products</i> • Commission Decision (EU) 2020/1803 <i>establishing the EU Ecolabel criteria for printed paper, stationery paper and paper carrier bag products</i> • Directive (EU) 2023/2413 on the promotion of the use of energy from renewable sources (<i>Renewable Energy Directive</i>) • Consolidated Regulation No. 1907/2006 on the registration, evaluation, authorisation and restriction of chemicals (<i>REACH</i>) • Consolidated Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures (<i>CLP</i>) • EN 643 European List of Standard Grades of Paper and Board for Recycling • ISO 14001:2015 Environmental Management Systems • EMAS EU Eco-management and Audit Scheme

SCOPE, REFERENCES, LEGISLATION AND CERTIFICATIONS/LABELS

<p>ECOLABELS</p>	<ul style="list-style-type: none"> • Forest Stewardship Council (FSC) • Programme for the Endorsement of Forest Certification (PEFC) • EU Ecolabel • Nordic Ecolabel • Blue Angel <p>NOTE: The EU Ecolabel, Nordic Ecolabel and Blue Angel all rely upon the FSC/PEFC criteria for sustainable forest management.</p> <div data-bbox="1178 325 2051 507" style="text-align: center;"> </div>
<p>REFERENCE DOCUMENTS</p>	<ol style="list-style-type: none"> 1. European Commission (2021) <i>EU Ecolabel Criteria for printed paper, stationery paper, and paper carrier bag products and Factsheet</i> 2. European Commission (2019) <i>Final technical report: Graphic paper, tissue paper and tissue products and Factsheet</i> 3. European Commission (2023) Regulation on Deforestation-free Products – <i>Overview and FAQs</i> 4. Irish Department of Agriculture, Food and the Marine <i>Forestry in Ireland</i> 5. Environmental Paper Network – <i>Tools and Resources</i> including <i>Carbon calculator for paper</i> 6. UK Department of the Environment, Food and Rural Affairs (2012) <i>Government Buying Standards for Paper</i> 7. Dutch Ministry of Infrastructure and Environment (2021) <i>Criteria for sustainable public procurement of paper</i> 8. Carbon Disclosure Project (2023) <i>Policy explainer on the EU Deforestation-free Products Regulation (EUDR)</i> 9. PEFC (various dates) <i>Standards and Guides</i> and <i>Information on EUDR</i> 10. FSC (various dates) <i>Document Centre</i> and <i>Information on EUDR</i>
<p>NOTES</p>	<p>Although there are no current EU GPP criteria for paper products, several European countries have developed national criteria (including the UK, Germany, France, Denmark, Netherlands and Malta) and these have been consulted in the preparation of the Irish criteria.</p> <p>The EU Deforestation-free Products Regulation (2023/1115) requires all operators placing wood, cattle, cocoa, coffee, oil palm, rubber and soya – and products made from these commodities – on the EU market to demonstrate that they have exercised due diligence in ensuring that the products are deforestation-free and have been produced in accordance with the relevant legislation of the country of production. The EUDR applies to products placed on the market from 30 December 2025 or 30 June 2026 in the case of micro- and small enterprises. Further information is available from the European Commission and Department for Agriculture, Food and the Marine, the competent authority for implementation in Ireland. For paper products placed on the market prior to this date, compliance with Regulation 995/2010 (EU Timber Regulation) is required.</p> <p>Ireland's <i>Climate Action Plan (2024)</i> commits to the following, as part of the Public Sector Climate Action Mandate:</p> <p>3.7 Paper</p> <p>3.7.1 Review any paper-based processes and evaluate the possibilities for digitisation so it becomes the default approach. Eliminate paper-based processes as far as is practicable. Where paper must be procured, ensure that recycled paper is the default.</p> <p>3.7.2 Measure and monitor paper consumption.</p> <p>The Irish GPP criteria have been updated in 2024 to reflect these requirements.</p>

HOW CAN THE CRITERIA BE APPLIED & VERIFIED?

Information about how each of the criteria can be verified is included.

The verification methods form an essential part of the criteria and must be included in tender documents to ensure that suppliers are aware of how compliance with the criteria will be assessed.

The criteria for paper products rely heavily on three independent third-party environmental certifications (ecolabels): FSC, PEFC and the EU Ecolabel. While the precise criteria underlying these certifications differ, they all address the basic requirements of legal and sustainably managed forestry. In addition, the EU Ecolabel addresses other production-related environmental impacts, such as use of water, energy and chemicals in the production process. For this reason, the comprehensive criteria for printed products and printing services draw heavily on the EU Ecolabel criteria.

In Europe, approximately 52% of the total timber production area is certified under FSC/PEFC, or 105 million hectares.¹ Worldwide, the figure is 430 million hectares.² For recycled paper products, the FSC and PEFC recycled labels, or an equivalent Type 1 ecolabel,³ can be provided as evidence. The comprehensive criteria align more closely with the EU Ecolabels for paper products. Under Article 43 of Directive 2014/24/EU, tenderers may seek to rely on other appropriate means of proof where

they have “demonstrably no possibility of obtaining the specific label indicated by the contracting authority or an equivalent label within the relevant time limits for reasons that are not attributable to [the tenderer].” In such cases, the alternative means of proof, together with an explanation for the reason for a lack of third-party certification, must be submitted as part of the tender.⁴

NOTE: At time of publication, both FSC and PEFC are developing a certification module to confirm compliance with the EU Deforestation-free Products Regulation. For products placed on the market from 30 December 2025, or 30 June 2026 in the case of small and medium-sized enterprises, compliance with TS2 may be demonstrated by providing evidence that the products are certified as EUDR-compliant by FSC or PEFC. Note that not all products carrying FSC or PEFC certification may have this specific module.

Some simple market research in advance of tendering should be sufficient to confirm that suppliers, products and services are available which meet the criteria and verification requirements. Further information on techniques for market engagement linked to GPP is available in the EPA guidance document/ Module 6 of the *GPP Training Toolkit*.

¹ *Forest Europe* (2020), p 108.

² *PEFC* (2019)

³ According to *ISO 14024:2018* Environmental Labels and Declarations—Type 1 Environmental Labelling

⁴ Case C-14/17 VAR Srl and ATM v Iveco Orrechia SpA

KEY ENVIRONMENTAL IMPACTS – PAPER PRODUCTS

Global paper consumption amounts to some 400 million tonnes per year (55 kg per person), a quarter of which is consumed in Europe.⁵ Production and use of paper products has a heavy environmental footprint, including:

- Forest destruction, loss of biodiversity and climate change effects from unsustainable timber harvesting
- Emissions to air and water during pulp and paper production, conversion and printing
- Energy consumption during pulp and paper production, conversion and printing
- Water consumption during pulp and paper production
- Landfill due to failure to recycle paper products, especially where products also contain non-paper elements

The GPP criteria aim to:

- Safeguard forests to ensure that only paper products from legally and sustainably harvested timber are used
- Promote the appropriate use of recycled paper products
- Reduce emissions to water, air and soil during the production process
- Promote energy-efficient production of paper products
- Reduce environmental damage or risks linked to hazardous chemicals
- Promote responsible waste management for paper products

The **core criteria** focus on the legal and sustainable origin of timber and are aligned with the requirements of the FSC and PEFC labels to facilitate verification and ensure a good market supply of compliant products.

Regarding the use of **recycled paper fibres**, this is generally considered to be a more sustainable option and the use of 100% recycled paper where feasible is recommended. However, for some paper grades a certain amount of virgin fibre input will be required to reach technical parameters as (unlike metals and some plastics) the strength of recycled paper fibres can degrade over time.

The **comprehensive criteria** are aligned with the requirements of the EU Ecolabels for graphic paper and printed paper products. In addition to the above, the comprehensive criteria cover the production of pulp, including all constituent sub-processes from the point at which virgin fibres or recycled fibres enter the production site to the point at which the pulp leaves the pulp mill. For paper production processes, the criteria cover all sub-processes in the paper mill, from pulp preparation for graphic papermaking to winding onto the mother reel.

⁵ *Environmental Paper Network* (2018), p 4.

KEY ENVIRONMENTAL IMPACTS

- Forest destruction, loss of biodiversity and climate change effects from illegal and unsustainable timber harvesting;
- Emissions to water and air during pulp and paper production, conversion and printing;
- Energy consumption during pulp and paper production, conversion and printing;
- Water consumption during pulp and paper production;
- Additional consumption of resources due to waste in production process;
- Landfill due to failure to recycle paper products, especially where products also contain non-paper elements



GPP APPROACH

- Require suppliers to demonstrate the legality and sustainability of timber sourcing in line with independent third-party certifications
- Restrictions on emissions to water of silver, chromium and copper and to air of volatile organic compounds during processing
- Require suppliers to have systems in place for the minimisation of energy consumption from grid electricity and fossil fuels.
- Require suppliers to have systems in place for the minimisation of water use from mains supply and other sources
- Set limits on paper waste during production processes and ensure products are suitable for recycling

Please note that the order of environmental impacts above does not necessarily correspond to their importance.

GPP CRITERIA FOR PAPER PRODUCTS

NB. A merged cell for core and comprehensive criteria indicates that the same criterion is applicable to both. The criteria contain a number of internal cross-references – where they are copied and pasted into tender documents these should be carefully checked.

SUBJECT MATTER
Supply of graphic paper with reduced environmental impact

A GRAPHIC PAPER (PRINTING & COPYING PAPER)

CORE CRITERIA	COMPREHENSIVE CRITERIA
TECHNICAL SPECIFICATIONS	
<p>TS1. 100% recycled paper Unless otherwise specified, all paper supplied under the contract must be certified as 100% recycled.</p> <p>Verification: Paper bearing the FSC Recycled, PEFC Recycled or an equivalent third-party certification will be deemed to comply.</p> <p>NOTE: <i>Under Article 43 of Directive 2014/24/EU, tenderers may seek to rely on other appropriate means of proof where they have “demonstrably no possibility of obtaining the specific label indicated by the contracting authority or an equivalent label within the relevant time limits for reasons that are not attributable to [the tenderer].” In such cases, the alternative means of proof, together with an explanation for the reason for a lack of third-party certification, must be submitted as part of the tender.</i></p>	

CORE CRITERIA	COMPREHENSIVE CRITERIA
TECHNICAL SPECIFICATIONS	
<p>TS2. Legal and sustainable sourcing of virgin fibres for pulp production</p> <p>NOTE: <i>This criterion is only relevant where TS1, requiring 100% recycled paper, is not applied.</i></p> <p>Evidence of compliance with the relevant obligations under either the EU Timber Regulation (for products placed on the market prior to 30 December 2024) or the EU Deforestation-free Products Regulation (for products placed on the market after 30 December 2024, or 30 June 2025 in the case of micro- and small enterprises*) must be provided. If the products are not considered to be subject to these obligations, this must be explained within the tender.</p> <p>Verification: Tenderers must declare as part of their tender that they will provide the relevant due diligence information in relation to all products supplied as part of the contract which are covered by the EU Deforestation-free Products Regulation or EU Timber Regulation. This obligation applies regardless of whether the tenderer is the party legally obliged to produce the due diligence information. Products which are certified under FSC, PEFC or an equivalent certification which incorporates the requirements of the EU Deforestation-free Products Regulation, will be deemed to comply.</p> <p>*Operators that by 31 December 2020 were established as micro-undertakings or small undertakings pursuant to Article 3(1) or (2) of Directive 2013/34/EU</p> <p>NOTE: <i>The precise due diligence obligations which apply depend on a) the size of the operator or trader and b) the risk-designation of the country of origin. The type of due diligence information submitted by different tenderers will vary accordingly. At time of publication, both FSC and PEFC are developing a certification module to confirm compliance with the EU Deforestation-free Products Regulation. For products placed on the market after 30 December 2024, or 30 June 2025 in the case of small and medium-sized enterprises, compliance with TS2 may be demonstrated by providing evidence that the products are certified by FSC or PEFC under the relevant regulatory module.</i></p>	

CORE CRITERIA	COMPREHENSIVE CRITERIA
TECHNICAL SPECIFICATIONS	
	<p>TS3. EU Ecolabel Criteria – Graphic Paper</p> <p>The paper supplied must meet the requirements set out in Commission Decision (EU) 2019/70 in relation to:</p> <ol style="list-style-type: none"> 1. Emissions to water and air 2. Energy use 3. Fibres: conserving resources, sustainable forest management 4. Restricted hazardous substances and mixtures 5. Waste management 6. Fitness for use 7. Information on the packaging <p>Verification: Products which carry the EU Ecolabel for graphic paper will be deemed to comply. If an alternative third-party certification is relied upon, evidence regarding its equivalence must be submitted as part of the tender.</p> <p>NOTE: <i>Under Article 43 of Directive 2014/24/EU, tenderers may seek to rely on other appropriate means of proof where they have “demonstrably no possibility of obtaining the specific label indicated by the contracting authority or an equivalent label within the relevant time limits for reasons that are not attributable to [the tenderer].” In such cases, the alternative means of proof, together with an explanation for the reason for a lack of third-party certification, must be submitted as part of the tender.</i></p>

CORE CRITERIA	COMPREHENSIVE CRITERIA
AWARD CRITERIA	
<p>AC1. EU Ecolabel Criteria – Graphic Paper <i>Not applicable if TS3 on EU Ecolabel criteria is applied.</i></p> <p>Up to [X] marks will be awarded if the paper supplied meets the requirements set out in Commission Decision (EU) 2019/70 in relation to:</p> <ol style="list-style-type: none"> 1. Emissions to water and air 2. Energy use 3. Fibres: conserving resources, sustainable forest management 4. Restricted hazardous substances and mixtures 5. Waste management 6. Fitness for use 7. Information on the packaging <p>Verification: Products which carry the EU Ecolabel for graphic paper will be deemed to comply. If an alternative third-party certification is relied upon, evidence regarding its equivalence must be submitted as part of the tender.</p> <p>NOTE: <i>Under Article 43 of Directive 2014/24/EU, tenderers may seek to rely on other appropriate means of proof where they have “demonstrably no possibility of obtaining the specific label indicated by the contracting authority or an equivalent label within the relevant time limits for reasons that are not attributable to [the tenderer].” In such cases, the alternative means of proof, together with an explanation for the reason for a lack of third-party certification, must be submitted as part of the tender.</i></p>	
<p>CPC1. Due diligence obligations <i>Not applicable if 100% recycled paper is specified (TS1).</i></p> <p>The contractor is responsible for ensuring compliance with the [EU Timber Regulation (Regulation No. 995/2010)* and] EU Deforestation Regulation (Regulation 2023/1115) in respect of all materials and products supplied under the contract. The contractor must provide the contracting authority with a link to the relevant due diligence information in respect of all products covered by these regulations, or a link to the product’s certification under FSC, PEFC or an equivalent certification which demonstrates compliance with these regulations. This information must be provided at the latest at the point where an invoice is submitted in respect of the products. Where the required information has not been provided by the contractor, the contracting authority shall have the right to deduct an amount equivalent to the value of the relevant products from invoices, and may also apply other penalties.</p> <p>* The EU Timber Regulation applies to products placed on the market prior to 30 December 2025 The EU Deforestation-free Products Regulation applies to products placed on the market from 30 December 2025, or 30 June 2026 in the case of micro- and small enterprises.</p>	

B PRINTED & CONVERTED PAPER PRODUCTS

SUBJECT MATTER

Printed paper products, including envelopes, stationery paper and paper carrier bags

CORE CRITERIA

COMPREHENSIVE CRITERIA

TECHNICAL SPECIFICATIONS

TS1. 100% recycled paper products

All paper and paper products used to fulfil the contract must be certified as 100% recycled.

Verification: Paper products bearing the FSC Recycled, PEFC Recycled or an equivalent third-party certification will be deemed to comply.

NOTE: Under Article 43 of Directive 2014/24/EU, tenderers may seek to rely on other appropriate means of proof where they have “demonstrably no possibility of obtaining the specific label indicated by the contracting authority or an equivalent label within the relevant time limits for reasons that are not attributable to [the tenderer].” In such cases, the alternative means of proof, together with an explanation for the reason for a lack of third-party certification, must be submitted as part of the tender.

TS2. Legal and sustainable sourcing of virgin fibres for pulp production

NOTE: This criterion is only relevant where TS1, requiring 100% recycled paper, is not applied.

Evidence of compliance with the relevant obligations under either the EU Timber Regulation (for products placed on the market prior to 30 December 2024) or the EU Deforestation-free Products Regulation (for products placed on the market from 30 December 2025, or 30 June 2026 in the case of micro- and small enterprises*) must be provided. If the products are not considered to be subject to these obligations, this must be explained within the tender.

Verification: Tenderers must declare as part of their tender that they will provide the relevant due diligence information in relation to all products supplied as part of the contract which are covered by the EU Deforestation-free Products Regulation or EU Timber Regulation. This obligation applies regardless of whether the tenderer is the party legally obliged to produce the due diligence information. Products which are certified under FSC, PEFC or an equivalent certification as being compliant with which incorporates the requirements of the EU Deforestation-free Products Regulation, will be deemed to comply.

*Operators that by 31 December 2020 were established as micro-undertakings or small undertakings pursuant to Article 3(1) or (2) of Directive 2013/34/EU

NOTE: The precise due diligence obligations which apply depend on a) the size of the operator or trader and b) the risk-designation of the country of origin. The type of due diligence information submitted by different tenderers will vary accordingly. At time of publication, both FSC and PEFC are developing a certification module to confirm compliance with the EU Deforestation-free Products Regulation. For products placed on the market from 30 December 2025, or 30 June 2026 in the case of small and medium-sized enterprises, compliance with TS2 may be demonstrated by providing evidence that the products are certified as EUDR-compliant by FSC or PEFC under the relevant regulatory module.

CORE CRITERIA	COMPREHENSIVE CRITERIA
TECHNICAL SPECIFICATIONS	
	<p>TS3. EU Ecolabel Criteria</p> <p>Printed paper, stationery paper and printed paper carrier bag products [remove any not relevant] supplied under the contract must meet the requirements set out in Commission Decision (EU) 2020/1803 in relation to:</p> <ol style="list-style-type: none"> 1. Substrate 2. Restricted substances: <ol style="list-style-type: none"> 2.1. Restrictions on Substances of Very High Concern (SVHCs) 2.2. Restrictions on substances classified under Regulation (EC) No 1272/2008 of the European Parliament and of the Council (1) 2.3. Biocidal products and biocidal active substances 2.4. Cleaning agents 2.5. Alkyl phenol ethoxylates, halogenated solvents and phthalates 2.6. Further restrictions applying to printing inks, toners and varnishes 2.7. Toluene recovery from rotogravure printing 3. Recyclability <ol style="list-style-type: none"> 3.1. Removability of non-paper parts 3.2. Repulpability 3.3. Adhesives removability 3.4. Deinkability 4. Emissions: <ol style="list-style-type: none"> 4.1. Emissions to water from rotogravure printing 4.2. Emission from installations covered by Directive 2010/75/EU of the European Parliament and of the Council (2) or equivalent installations 4.3. VOCs emission from printing processes not covered by Directive 2010/75/EU of the European Parliament and of the Council

CORE CRITERIA	COMPREHENSIVE CRITERIA
TECHNICAL SPECIFICATIONS	
	<p>TS3. EU Ecolabel Criteria (continued)</p> <ul style="list-style-type: none"> 5. Waste: <ul style="list-style-type: none"> 5.1. Waste management system 5.2. Paper for recycling from printing facilities 5.3. Paper for recycling from stationery paper product and carrier bags production sites 6. Energy use 7. Training 8. Fitness for use 9. Information on the product <p>Verification: Products which carry the EU Ecolabel for printed paper, stationery paper and printed carrier bag products, will be deemed to comply. If an alternative third-party certification is relied upon, evidence regarding its equivalence must be submitted as part of the tender.</p> <p>NOTE: <i>Under Article 43 of Directive 2014/24/EU, tenderers may seek to rely on other appropriate means of proof where they have “demonstrably no possibility of obtaining the specific label indicated by the contracting authority or an equivalent label within the relevant time limits for reasons that are not attributable to [the tenderer].” In such cases, the alternative means of proof, together with an explanation for the reason for a lack of third-party certification, must be submitted as part of the tender.</i></p>

CORE CRITERIA	COMPREHENSIVE CRITERIA
AWARD CRITERIA	
<p>AC1. EU Ecolabel Criteria – Graphic Paper <i>Not applicable if TS3 on EU Ecolabel Criteria is applied.</i></p> <p>Up to [X] marks will be awarded if the paper supplied meets the requirements set out in Commission Decision (EU) 2019/70 in relation to:</p> <ol style="list-style-type: none"> 1. Emissions to water and air 2. Energy use 3. Fibres: conserving resources, sustainable forest management 4. Restricted hazardous substances and mixtures 5. Waste management 6. Fitness for use 7. Information on the packaging <p>Verification: Products which carry the EU Ecolabel for graphic paper will be deemed to comply. If an alternative third-party certification is relied upon, evidence regarding its equivalence must be submitted as part of the tender.</p> <p>NOTE: <i>Under Article 43 of Directive 2014/24/EU, tenderers may seek to rely on other appropriate means of proof where they have “demonstrably no possibility of obtaining the specific label indicated by the contracting authority or an equivalent label within the relevant time limits for reasons that are not attributable to [the tenderer].” In such cases, the alternative means of proof, together with an explanation for the reason for a lack of third-party certification, must be submitted as part of the tender.</i></p>	

CORE CRITERIA	COMPREHENSIVE CRITERIA
AWARD CRITERIA	
<p>AC2. EU Ecolabel criteria – Printed and stationery paper products</p> <p>Up to [X] marks will be awarded if the products supplied meet the requirements set out in Commission Decision (EU) 2020/1803 in relation to:</p> <ol style="list-style-type: none"> 1. Substrate 2. Restricted substances: <ol style="list-style-type: none"> 2.1. Restrictions on Substances of Very High Concern (SVHCs) 2.2. Restrictions on substances classified under Regulation (EC) No 1272/2008 of the European Parliament and of the Council (1) 2.3. Biocidal products and biocidal active substances 2.4. Cleaning agents 2.5. Alkyl phenol ethoxylates, halogenated solvents and phthalates 2.6. Further restrictions applying to printing inks, toners and varnishes 2.7. Toluene recovery from rotogravure printing 3. Recyclability <ol style="list-style-type: none"> 3.1. Removability of non-paper parts 3.2. Repulpability 3.3. Adhesives removability 3.4. Deinkability 4. Emissions: <ol style="list-style-type: none"> 4.1. Emissions to water from rotogravure printing 4.2. Emission from installations covered by Directive 2010/75/EU of the European Parliament and of the Council (2) or equivalent installations 4.3. VOCs emission from printing processes not covered by Directive 2010/75/EU of the European Parliament and of the Council 	

CORE CRITERIA	COMPREHENSIVE CRITERIA
AWARD CRITERIA	
<p>AC2. EU Ecolabel criteria – Printed and stationery paper products (continued)</p> <ul style="list-style-type: none"> 5. Waste: <ul style="list-style-type: none"> 5.1. Waste management system 5.2. Paper for recycling from printing facilities 5.3. Paper for recycling from stationery paper product and carrier bags production sites 6. Energy use 7. Training 8. Fitness for use 9. Information on the product <p>Verification: Products which carry the EU Ecolabel for printed paper, stationery paper and printed carrier bag products, will be deemed to comply. If an alternative third-party certification is relied upon, evidence regarding its equivalence must be submitted as part of the tender.</p> <p>NOTE: <i>Under Article 43 of Directive 2014/24/EU, tenderers may seek to rely on other appropriate means of proof where they have “demonstrably no possibility of obtaining the specific label indicated by the contracting authority or an equivalent label within the relevant time limits for reasons that are not attributable to [the tenderer].” In such cases, the alternative means of proof, together with an explanation for the reason for a lack of third-party certification, must be submitted as part of the tender.</i></p>	
<p>CPC1. Due diligence obligations <i>Not applicable if 100% recycled paper is specified (TS1)</i></p> <p>The contractor is responsible for ensuring compliance with the [EU Timber Regulation (Regulation No. 995/2010)* and] EU Deforestation Regulation (Regulation 2023/1115) in respect of all materials and products supplied under the contract. The contractor must provide the contracting authority with a link to the relevant due diligence information in respect of all products covered by these regulations, or a link to the product’s certification under FSC, PEFC or an equivalent certification which demonstrates compliance with these regulations. This information must be provided at the latest at the point where an invoice is submitted in respect of the products. Where the required information has not been provided by the contractor, the contracting authority shall have the right to deduct an amount equivalent to the value of the relevant products from invoices, and may also apply other penalties.</p> <p>*The EU Timber Regulation applies to products placed on the market prior to 30 December 2025. The EU Deforestation-free Products Regulation applies to products placed on the market from 30 December 2025 or 30 June 2026 in the case of micro- and small enterprises.</p>	

C GPP CRITERIA FOR PRINTING SERVICES

SUBJECT MATTER

The provision of printing services with reduced environmental impact.

CORE CRITERIA

COMPREHENSIVE CRITERIA

SELECTION CRITERIA

SC1. **Environmental technical capacity**

To be used where TS3 on Environmental management measures is not applied.

Evidence must be provided of the equipment, expertise, documented procedures and management systems in place which are appropriate to address the main environmental impacts of the printing service, including:

- Sourcing of legal and sustainable paper and other materials
- Minimisation of waste during printing, finishing and other processes
- Energy efficiency at the production site(s)
- Efficient use of water at the production site(s)
- Avoidance of hazardous substances, and correct handling and disposal of any which cannot be avoided
- Staff training in each of the above aspects

Verification: Tenderers must describe the equipment, procedures and management systems which they and any subcontractors have in place to minimise the impact of the printing services. Evidence in the form of a certified environmental management system (e.g. ISO 14001, EMAS or equivalent) and/or energy management system may be provided. Examples of the application of these procedures in previous contracts should be provided. Where it is deemed appropriate, the contracting authority reserves the right to carry out site visits and inspections, or to request third party inspections, in order to confirm the tenderer's capabilities.

EXPLANATORY NOTE: The above selection criterion may be evaluated either on a pass/fail or scored basis, and so can be used in both open and two-stage procedures. If scoring will be applied, the contracting authority should indicate the marks available in respect of this criterion.

CORE CRITERIA	COMPREHENSIVE CRITERIA
TECHNICAL SPECIFICATIONS	
<p>TS1. 100% Recycled Paper and Paper Products Unless otherwise specified, all paper and paper products used to fulfil the contract must be certified as 100% recycled..</p> <p>Verification: Paper products bearing the FSC Recycled, PEFC Recycled or an equivalent third-party certification will be deemed to comply.</p> <p>NOTE: <i>Under Article 43 of Directive 2014/24/EU, tenderers may seek to rely on other appropriate means of proof where they have “demonstrably no possibility of obtaining the specific label indicated by the contracting authority or an equivalent label within the relevant time limits for reasons that are not attributable to [the tenderer].” In such cases, the alternative means of proof, together with an explanation for the reason for a lack of third-party certification, must be submitted as part of the tender.</i></p>	
<p>TS2. Legal and sustainable sourcing of virgin fibres for pulp production NOTE: <i>This criterion is only relevant where TS1, requiring 100% recycled paper, is not applied.</i></p> <p>Evidence of compliance with the relevant obligations under either the EU Timber Regulation (for products placed on the market prior to 30 December 2025) or the EU Deforestation-free Products Regulation (for products placed on the market from 30 December 2025, or 30 June 2026 in the case of micro- and small enterprises*) must be provided. If the products are not considered to be subject to these obligations, this must be explained within the tender.</p> <p>Verification: Tenderers must declare as part of their tender that they will provide the relevant due diligence information in relation to all products supplied as part of the contract which are covered by the EU Deforestation-free Products Regulation or EU Timber Regulation. This obligation applies regardless of whether the tenderer is the party legally obliged to produce the due diligence information. Products which are certified under FSC, PEFC or an equivalent certification which incorporate the requirements of the EU Deforestation-free Products Regulation, will be deemed to comply.</p> <p>*Operators that by 31 December 2020 were established as micro-undertakings or small undertakings pursuant to Article 3(1) or (2) of Directive 2013/34/EU</p> <p>NOTE: <i>The precise due diligence obligations which apply depend on a) the size of the operator or trader and b) the risk-designation of the country of origin. The type of due diligence information submitted by different tenderers will vary accordingly. At time of publication, both FSC and PEFC are developing a certification module to confirm compliance with the EU Deforestation-free Products Regulation. For products placed on the market from 30 December 2025 or 30 June 2026 in the case of small and medium-sized enterprises, compliance with TS2 may be demonstrated by providing evidence that the products are certified by FSC or PEFC under the relevant regulatory module.</i></p>	

CORE CRITERIA	COMPREHENSIVE CRITERIA
TECHNICAL SPECIFICATIONS	
<p>TS3. Environmental management measures</p> <p>To be used if SC1 on Environmental Technical Capacity has not been applied.</p> <p>Evidence must be provided of the equipment, expertise, documented procedures and management systems in place which are appropriate to address the main environmental impacts of the printing service, including:</p> <ul style="list-style-type: none"> • Sourcing of legal and sustainable paper and other materials • Minimisation of waste during printing, finishing and other processes • Energy efficiency at the production site(s) • Efficient use of water at the production site(s) • Avoidance of hazardous substances, and correct handling and disposal of any which cannot be avoided • Staff training in each of the above aspects <p>Verification: Tenderers must describe the equipment, procedures and management systems which they and any subcontractors have in place to minimise the impact of the printing services. Evidence in the form of a certified environmental management system (e.g. ISO 14001, EMAS or equivalent) and/or energy management system may be provided. Where it is deemed appropriate, the contracting authority reserves the right to carry out site visits and inspections, or to request third party inspections, in order to confirm the tenderer's capabilities.</p>	
	<p>TS4. EU Ecolabel criteria – Graphic Paper</p> <p>The graphic paper used to fulfil the contract must meet the requirements set out in Commission Decision (EU) 2019/70 in relation to:</p> <ol style="list-style-type: none"> 1. Emissions to water and air 2. Energy use 3. Fibres: conserving resources, sustainable forest management 4. Restricted hazardous substances and mixtures 5. Waste management 6. Fitness for use 7. Information on the packaging <p>Verification: Products which carry the EU Ecolabel for graphic paper will be deemed to comply. If an alternative third-party certification is relied upon, evidence regarding its equivalence must be submitted as part of the tender.</p>

CORE CRITERIA	COMPREHENSIVE CRITERIA
TECHNICAL SPECIFICATIONS	
	<p>TS4. EU Ecolabel criteria – Graphic Paper (continued)</p> <p><i>NOTE: Under Article 43 of Directive 2014/24/EU, tenderers may seek to rely on other appropriate means of proof where they have “demonstrably no possibility of obtaining the specific label indicated by the contracting authority or an equivalent label within the relevant time limits for reasons that are not attributable to [the tenderer].” In such cases, the alternative means of proof, together with an explanation for the reason for a lack of third-party certification, must be submitted as part of the tender.</i></p>
	<p>TS5. EU Ecolabel criteria – Printed and stationery paper products</p> <p>Printed paper, stationery paper and printed paper carrier bag products <i>[remove any not relevant]</i> supplied under the contract must meet the requirements set out in <i>Commission Decision (EU) 2020/1803</i> in relation to:</p> <ol style="list-style-type: none"> 1. Substrate 2. Restricted substances: <ol style="list-style-type: none"> 2.1. Restrictions on Substances of Very High Concern (SVHCs) 2.2. Restrictions on substances classified under Regulation (EC) No 1272/2008 of the European Parliament and of the Council (1) 2.3. Biocidal products and biocidal active substances 2.4. Cleaning agents 2.5. Alkyl phenol ethoxylates, halogenated solvents and phthalates 2.6. Further restrictions applying to printing inks, toners and varnishes 2.7. Toluene recovery from rotogravure printing 3. Recyclability <ol style="list-style-type: none"> 3.1. Removability of non-paper parts 3.2. Repulpability 3.3. Adhesives removability 3.4. Deinkability

CORE CRITERIA	COMPREHENSIVE CRITERIA
TECHNICAL SPECIFICATIONS	
	<p>TS5. EU Ecolabel criteria – Printed and stationery paper products (continued)</p> <ul style="list-style-type: none"> 4. Emissions: <ul style="list-style-type: none"> 4.1. Emissions to water from rotogravure printing 4.2. Emission from installations covered by Directive 2010/75/EU of the European Parliament and of the Council (2) or equivalent installations 4.3. VOCs emission from printing processes not covered by Directive 2010/75/EU of the European Parliament and of the Council 5. Waste: <ul style="list-style-type: none"> 5.1. Waste management system 5.2. Paper for recycling from printing facilities 5.3. Paper for recycling from stationery paper product and carrier bags production sites 6. Energy use 7. Training 8. Fitness for use 9. Information on the product <p>Verification: Products which carry the EU Ecolabel for printed paper, stationery paper and printed carrier bag products, will be deemed to comply. If an alternative third-party certification is relied upon, evidence regarding its equivalence must be submitted as part of the tender.</p> <p>NOTE: <i>Under Article 43 of Directive 2014/24/EU, tenderers may seek to rely on other appropriate means of proof where they have “demonstrably no possibility of obtaining the specific label indicated by the contracting authority or an equivalent label within the relevant time limits for reasons that are not attributable to [the tenderer].” In such cases, the alternative means of proof, together with an explanation for the reason for a lack of third-party certification, must be submitted as part of the tender.</i></p>

CORE CRITERIA	COMPREHENSIVE CRITERIA
AWARD CRITERIA	
<p>AC1. EU Ecolabel Criteria – Graphic Paper</p> <p>Up to [X] marks will be awarded if the graphic paper used to fulfil the contract meets the requirements set out in Commission Decision (EU) 2019/70 in relation to:</p> <ol style="list-style-type: none"> 1. Emissions to water and air 2. Energy use 3. Fibres: conserving resources, sustainable forest management 4. Restricted hazardous substances and mixtures 5. Waste management 6. Fitness for use 7. Information on the packaging <p>Verification: Products which carry the EU Ecolabel for graphic paper will be deemed to comply. If an alternative third-party certification is relied upon, evidence regarding its equivalence must be submitted as part of the tender.</p> <p>NOTE: <i>Under Article 43 of Directive 2014/24/EU, tenderers may seek to rely on other appropriate means of proof where they have “demonstrably no possibility of obtaining the specific label indicated by the contracting authority or an equivalent label within the relevant time limits for reasons that are not attributable to [the tenderer].” In such cases, the alternative means of proof, together with an explanation for the reason for a lack of third-party certification, must be submitted as part of the tender.</i></p>	

CORE CRITERIA	COMPREHENSIVE CRITERIA
AWARD CRITERIA	
<p>AC2. EU Ecolabel criteria – Printed and stationery paper products</p> <p>Up to [X] marks will be awarded if the printed paper, stationery paper and printed paper carrier bag products [remove any not relevant] supplied under the contract meet the requirements set out in Commission Decision (EU) 2020/1803 in relation to:</p> <ol style="list-style-type: none"> 1. Substrate 2. Restricted substances: <ol style="list-style-type: none"> 2.1. Restrictions on Substances of Very High Concern (SVHCs) 2.2. Restrictions on substances classified under Regulation (EC) No 1272/2008 of the European Parliament and of the Council (1) 2.3. Biocidal products and biocidal active substances 2.4. Cleaning agents 2.5. Alkyl phenol ethoxylates, halogenated solvents and phthalates 2.6. Further restrictions applying to printing inks, toners and varnishes 2.7. Toluene recovery from rotogravure printing 3. Recyclability <ol style="list-style-type: none"> 3.1. Removability of non-paper parts 3.2. Repulpability 3.3. Adhesives removability 3.4. Deinkability 4. Emissions: <ol style="list-style-type: none"> 4.1. Emissions to water from rotogravure printing 4.2. Emission from installations covered by Directive 2010/75/EU of the European Parliament and of the Council (2) or equivalent installations 4.3. VOCs emission from printing processes not covered by Directive 2010/75/EU of the European Parliament and of the Council 	

CORE CRITERIA	COMPREHENSIVE CRITERIA
AWARD CRITERIA	
<p>AC2. EU Ecolabel criteria – Printed and stationery paper products (continued)</p> <ul style="list-style-type: none"> 5. Waste: <ul style="list-style-type: none"> 5.1. Waste management system 5.2. Paper for recycling from printing facilities 5.3. Paper for recycling from stationery paper product and carrier bags production sites 6. Energy use 7. Training 8. Fitness for use 9. Information on the product <p>Verification: Products which carry the EU Ecolabel for printed paper, stationery paper and printed carrier bag products, will be deemed to comply. If an alternative third-party certification is relied upon, evidence regarding its equivalence must be submitted as part of the tender.</p> <p>NOTE: <i>Under Article 43 of Directive 2014/24/EU, tenderers may seek to rely on other appropriate means of proof where they have “demonstrably no possibility of obtaining the specific label indicated by the contracting authority or an equivalent label within the relevant time limits for reasons that are not attributable to [the tenderer].” In such cases, the alternative means of proof, together with an explanation for the reason for a lack of third-party certification, must be submitted as part of the tender.</i></p>	
CONTRACT PERFORMANCE CLAUSES	
<p>CPC1. Due diligence obligations <i>Not applicable if 100% recycled paper is specified (TS1)</i></p> <p>The contractor is responsible for ensuring compliance with the [EU Timber Regulation (Regulation No. 995/2010) and] EU Deforestation Regulation (Regulation 2023/1115) in respect of all materials and products supplied under the contract. The contractor must provide the contracting authority with a link to the relevant due diligence information in respect of all products covered by these regulations, or a link to the product’s certification under FSC, PEFC or an equivalent certification which demonstrates compliance with these regulations. This information must be provided at the latest at the point where an invoice is submitted in respect of the products. Where the required information has not been provided by the contractor, the contracting authority shall have the right to deduct an amount equivalent to the value of the relevant products from invoices, and may also apply other penalties.</p>	

CORE CRITERIA

COMPREHENSIVE CRITERIA

CONTRACT PERFORMANCE CLAUSES

CPC2. **Environmental management measures**

At the time of submitting any invoice under the contract, the contractor must provide a statement regarding the environmental management measures which have been applied in delivery of the services. The contracting authority may seek confirmation regarding the practices applied to confirm they are in accordance with the tender specifications and the contractor's tender. Failure to meet these requirements may result in payment deductions.

ANNEX 1: LIST OF HAZARD STATEMENTS & RISK PHRASES

Hazard Statement ⁶	Risk Phrase
H300 Fatal if swallowed	R28
H301 Toxic if swallowed	R25
H304 May be fatal if swallowed and enters airways	R65
H310 Fatal in contact with skin	R27
H311 Toxic in contact with skin	R24
H330 Fatal if inhaled	R26
H331 Toxic if inhaled	R23
H340 May cause genetic defects	R46
H341 Suspected of causing genetic defects	R68
H350 May cause cancer	R45
H350i May cause cancer by inhalation	R49
H351 Suspected of causing cancer	R40
H360F May damage fertility	R60
H360D May damage the unborn child	R61
H360FD May damage fertility. May damage the unborn child	R60; R61; R60-61
H360Fd May damage fertility. Suspected of damaging the unborn child	R60-R63
H360Df May damage the unborn child. Suspected of damaging fertility	R61-R62
H361f Suspected of damaging fertility	R62
H361d Suspected of damaging the unborn child	R63
H361fd Suspected of damaging fertility. Suspected of damaging the unborn child	R62-63

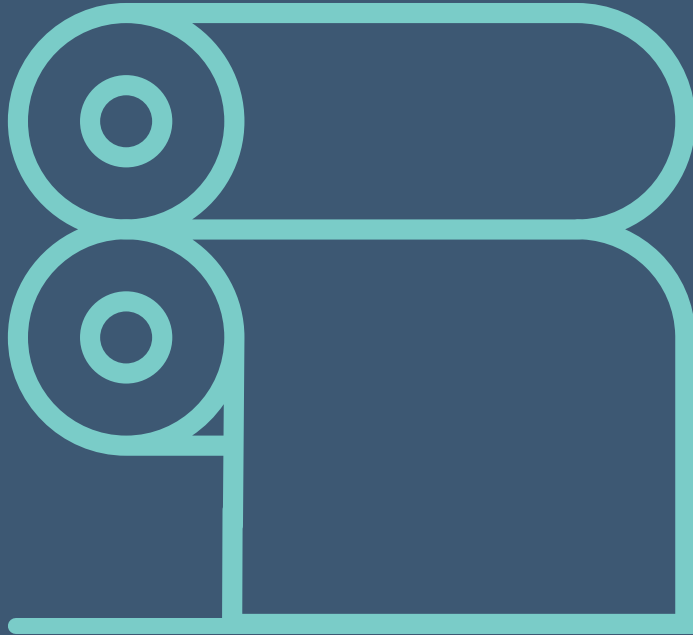
⁶ As provided for in Regulation (EC) No 1272/2008 of the European Parliament and of the Council

Hazard Statement ⁶	Risk Phrase ³⁰
H362 May cause harm to breast fed children	R64
H370 Causes damage to organs	R39/23; R39/24; R39/25; R39/26; R39/27; R39/28
H371 May cause damage to organs	R68/20; R68/21; R68/22
H372 Causes damage to organs through prolonged or repeated exposure	R48/25; R48/24; R48/23
H373 May cause damage to organs through prolonged or repeated exposure	R48/20; R48/21; R48/22
H400 Very toxic to aquatic life	R50
H410 Very toxic to aquatic life with long-lasting effects	R50-53
H411 Toxic to aquatic life with long-lasting effects	R51-53
H412 Harmful to aquatic life with long-lasting effects	R52-53
H413 May cause long-lasting harmful effects to aquatic life	R53
EUH059 Hazardous to the ozone layer	R59
EUH029 Contact with water liberates toxic gas	R29
EUH031 Contact with acids liberates toxic gas	R31
EUH032 Contact with acids liberates very toxic gas	R32
EUH070 Toxic by eye contact	R39-41
No commercial dye formulation, colorants, surface-finishing agents, auxiliaries and coating materials shall be used on either pulp or board that has been assigned or may be assigned at the time of application the hazard statement H317: May cause allergic skin reaction.	R43

⁶ As provided for in Regulation (EC) No 1272/2008 of the European Parliament and of the Council



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