



June 20, 2008

**SCOPING COMMENT SUMMARY: Revised Green Seal Environmental Standard for Sanitary Paper Products, GS-1**

The scoping phase of the Green Seal Environmental Standard for Sanitary Paper Products, GS-1, standard revisions development has been completed. This standard is being revised to help consumers identify and choose environmentally preferable sanitary paper products. The scoping process was intended for stakeholders to help identify specific areas of the standard to be researched or included in the next step of the project, development of a proposed revised standard. This is the first of several steps where stakeholders can provide input on the development of the standard. Comments were solicited from the diverse stakeholders including manufacturers, users, non-profits, environmental groups, industry, and general interest groups. This document includes a summary of the comments received.

By participating in Green Seal's standard setting process, the following organizations played an important role in Green Seal's effort to encourage the design, manufacture and end use of environmentally superior products. Their assistance and involvement is greatly appreciated.

**Comments received from these organizations:**

Wausau Paper  
Kimberly-Clark  
Cascades  
Hoffmaster  
SCA

## **Products included/excluded in Standard "Scope"**

Comment:

Disposable napkins are currently included in the scope of the GS 9 standard. I'd like to see disposable placemats added.

Comment:

I like the approach of combining GS-1 and GS-9 into one consolidated standard for Tissue Paper, Paper Towels, and Paper Napkins. I would recommend more expansive language defining tissue-based products beyond bath tissue and facial tissue to cover other products such as toilet seat covers, placemats, table covers, etc., so as to avoid any confusion about what is covered in the standard.

Comment:

I agree. Having one standard that encompasses all AFH paper products would keep it complete and simple at the same time. Eliminates looking at different standards to understand what criteria the product is audited against.

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## **Relevant definitions in standard**

Comment:

This section of the standard needs to be expanded significantly. I would include the current definitions as stated in the standards as they exist now. However, other terms such as Processed Chlorine Free (vs. Elemental Chlorine Free vs. Totally Chlorine Free) could be explained. This is very misunderstood in the marketplace by both consumers and manufacturers.

Also, any new terms introduced in the revised standard concerning water, energy, effluents, etc., as a result of expansion of the standard should be fully defined in this section.

Comment:

Defining your terms up front ensures the users are on the same page and know exactly what is involved.

Comment:

There is some ambiguity in this section. Need to be as precise as possible here.

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## **Product performance requirements**

Comment:

I think the product performance requirements are a "must." However, the language in the new standard needs to be expanded and updated to include more specifics about quality and performance. Manufacturers should have published technical standards for each finished product, which should also address their performance testing methods.

Comment:

Having the performance requirements and appropriate documentation of quality audits assures consumers the products meet performance standards and not just "green". The documentation of ongoing quality testing also helps reinforce that this is an ongoing process with constant improvement, not just something that stops after the auditors leave.

Comment:

Section 3.2 of GS-1 requires at least 70 sq. ft of facial tissue in a box. This excludes significant volume that would otherwise conform to Green Seal criteria. Most Away From Home customers

prefer the quality and convenience of smaller boxes due to space constraints and existing dispensers.

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### **Virgin fiber source**

Comment:

I would like to see the requirement of 100% recycled fiber remain as part of the new combined standard. This has been one of the biggest strengths of GS-1 and GS-9 and has been a great differentiating factor when comparing to EcoLogo, CFPFA and other competing third-party certifications. To permit virgin fiber into the standards in any way would be a great step backwards.

Comment:

I would also like to see 100% recovered fiber remain as the qualifier for products versus allowing any virgin content.

Comment:

Virgin fiber should be allowed for some products since source reduction should be a focus. Because facial, napkin and bath products end up in landfill, to reduce landfill volume, consideration must be given to product utility. Studies indicate that towels made with a virgin/RF mix perform better than towels made with 100% RF (on a gm/gm basis). Therefore, usage of virgin/RF towels is reduced and less goes to landfill. Also, since RF can only be recycled a finite number of times (6 to 7), 100% RF for all products by all manufacturers is not feasible.

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### **Recovered fiber and post-consumer fiber minimum percentages**

Comment:

I would like to see the recovered fiber minimums remain at 100% for towel, tissue and napkin products. However, Green Seal should consider raising the post-consumer fiber minimum percentages, even if by some incremental steps. The EPA guidelines have been in place for many years and are subject to revision. Green Seal has the opportunity to take a leadership role and raise the bar.

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### **Bleaching and use of Chlorine**

Comment:

Only Processed Chlorine Free and Totally Chlorine Free processes should be considered... Elemental Chlorine Free should remain out of specification.

Comment:

I think only Processed Chlorine Free processes should be allowed in bleaching, with specific language strictly prohibiting the use of elemental chlorine, or any chlorine derivatives including chlorine dioxide or hypochlorite. I would recommend avoiding any language with Totally Chlorine Free in that it would imply the use of virgin fiber, and I feel the fiber requirements should remain at 100% recycled. The strict prohibition of chlorine of any kind sets Green Seal apart from other third-party certifications. Keeping this aggressive and strict language is a must.

Comment:

Process chlorine free should be the minimum requirement for recovered fiber bleaching.

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## **Prohibited substances (e.g., dyes, anti-microbials, carcinogens, fragrances, etc)**

Comment:

In the current standards, Green Seal prohibits added inks, dyes, pigments or fragrances in the finished product, which I think is a very important part of the standards for towels and tissue products. I would like to see Green Seal add stricter language and expand the listing of prohibited substances, for example, optical brighteners, antimicrobial agents, potential carcinogens of any kind, etc.

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## **Restrictions on air and water emissions**

Comment:

The current standards do address environmental violations as they relate to air and water emissions that can result in the denial of certification. However, I would like to see Green Seal add language to the revised standard specifically addressing restrictions on air and water emissions. This is an opportunity to broaden and strengthen this environmental requirement.

Comment:

A metric should be developed that addresses reasonable air and water emission restrictions to ensure downstream effects are considered as part of certification.

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## **Carbon Dioxide emissions (footprint, offsets)**

Comment:

The topics of offsets should not be included in a Green Seal standard. Responsible companies should be striving to reduce their carbon dioxide emissions. By adding some requirement of offsets it will allow companies to skip the "reduce" part and go right to buying their way into credit qualification.

Comment:

Currently there is no accepted standard for calculating carbon monoxide emissions. It is a complex process and requires third party verification. Recommend against including in the new standard at this time.

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## **Consumption of water and energy (amount, type, re-use, etc.)**

Comment:

In my opinion, this is an area where the current GS-1 and GS-9 standards fall short as they are now written. By virtue of the fact that Green Seal requires 100% recycled paper products only, we are bypassing several steps in the papermaking process, saving significant amounts of water and energy. However, this savings is not readily apparent or easily understood by purchasers or consumers of Green Seal certified towels and tissue products. This is also an area where other third-party certification compares themselves to Green Seal and claim to be superior. My recommendation is to add language addressing the consumption of water and energy, including the reuse and recirculation of water (where applicable) in the papermaking process (and comparing to 100% recycled papermaking processes to 100% virgin and the resulting savings in natural resources.)

Comment:

At a minimum, water and energy consumption requirements need to be included. This is a shortfall compared to some competing programs. The simple fact of making products with 100% recovered fiber has tremendous water and energy savings compared to virgin production.

Companies that use reclaimed water or have low energy/fresh water usage should be credited for the extra efforts.

Comment:

Currently all companies are focusing in this area due to cost. Since regulations and pricing structures vary among regions applying specific product targets would be difficult. Recommend against including in the new standard.

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### **New manufacturing technologies**

Comment:

I would like to see Green Seal include language about alternative fibers in the 100% recycled content, such as cotton, etc. as alternative recycled fibers may become available to manufacturers as they develop new products and processes for traditional towel and tissue products. These alternative fibers should also be considered in the post-consumer waste content as well. For example, recycled cotton fiber reclaimed from the waste stream could be included in the PCW calculation.

Comment:

Adding new technologies and fibers would allow for companies to offer alternate products that are still certified, provided they are 100% recycled (like cotton) and can also count towards PC content. Things like TAD technology, while still reducing fiber usage, requires the long virgin fiber length and tremendous amounts of energy. That is a very un-environmentally friendly process and would diminish the Green Seal certification.

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### **Packaging (sizes and materials)**

Comment:

I like the current standards requiring the cores for towel and tissue requiring 100% recycled fiber, and the inner box for facial tissue along with consumer packaging for bath tissue also requiring 100% recycled materials. I would like to see Green Seal add the requirement for paper bands and wraps, etc., used for folded towels and bath tissue to also be made of 100% recycled fiber. This would be consistent with the other packaging requirements and would "raise the bar." (These materials would be also readily available.) Also, I would like to see a requirement for a minimum recycled content requirement (including PCW) for corrugated cartons.

In addition, I would like for Green Seal to develop a requirement for a cube box facial tissue product. It is virtually impossible to get 70 sq ft in this packaging configuration, yet there is a real need for a Green Seal certified version of this product in the marketplace.

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### **Consumer education and labeling**

Comment:

I like the current labeling requirements and do not see any issues with the logo design, usage, etc. However, Green Seal should consider multi-language label requirements for manufacturers selling outside of the U.S. (Canada, Mexico, Europe), etc.

I am also very much in favor of any consumer education ideas/programs that promote "closing the loop" in recycling and the benefits of Green Seal certified paper products. I think the manufacturers of these certified products have a responsibility to educate consumers as much as practical.

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## **End of Life Management (waste)**

Comment:

I would like to see "Solid Waste and End of Life Management" language to include manufacturers working with distributors and end buyers to encourage them to recycle the corrugated cartons, packaging, cores, etc. of Green Seal certified paper products that can be diverted from the waste stream and returned to the manufacturing process. This would be consistent with the EPA's position of "Closing The Loop" in recycling and the objectives of various green purchasing programs.

Comment:

Working to enhance recycling action and awareness is a key proposition. Also, the waste at the end of the papermaking process should be addressed to further limit pressures on local landfills.

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## **Optional verification claims**

Comment:

One of the strengths of the Green Seal standards is the uniformity of the standards (combined with the strict enforcement). I would recommend that Green Seal not introduce any "gray" areas into the standards - keep the standards uniform.