



GS-1 Webinar Questions & Answers

The questions below were submitted by the attendees of a Green Seal webinar which took place on January 9, 2018. The corresponding answers were published after the webinar.

Questions about the Proposal

Q: In the new definition of agricultural waste, why did you include the exception for materials that would be composted?

Green Seal: There is no proposed change to the second sentence of the definition of “Agricultural Residue.” See the proposed changes below:

Agricultural Residue. Process waste material remaining from harvesting nonwood plants a non-timber-species agricultural plant after it was used to produce food or fiber, which would otherwise be incinerated or disposed of *in situ* or in a landfill. Material that would normally be used as compost/fertilizer *in situ* is excluded.

When Green Seal revised the GS-1 standard in 2008 – 2009, we received a similar question, and provided the following response. This Response to Comments document from 2009 can be found on Green Seal’s website.

2009 Response to Comments:

“The intent of allowing Sanitary Paper Products to be made from agricultural residue is to redirect a waste material into something useful. The intent is not to take something that is being used as a fertilizer and redirect it to a product use.”¹

Q: For rapidly renewable fibers, did Green Seal look at available products? I am curious if all of them are 100% RRF or if some of them also include virgin fiber? I want to make sure products are available to your standard.

Green Seal: During our market review, Green Seal did identify products that could meet the proposed standard (e.g., 40% bagasse / 60% eucalyptus, 80% recycled / 20% wheat straw, a combination of sugar cane and bamboo, etc.).

¹ http://www.green seal.org/Portals/0/Documents/Standards/GS-1%20Stn%20Dev/GS-1_Sanitary_Paper_Products_Proposed_Response_to_Comments.pdf

Q: Isn't agricultural waste very different from "rapidly renewable" virgin fiber? Why are you equating the two?

Green Seal: Each of the fiber types are very different. Recycled paper and agricultural residue currently in the standard are waste materials that are being reused.

Rapidly renewable fibers are virgin plants and rapidly growing trees that can also be considered environmentally-preferable if grown, harvested, and processed properly (see the Georgia Tech Study for more details).²

Q: Doesn't recycled content have the smallest environmental footprint because it reduces the amount of energy and water that is needed to make the paper?

Green Seal: It is Green Seal's goal to reflect current environmental leadership in today's market, which we estimate as the 15-20% of products in the market, according to the lowest environmental and health impacts. Sanitary paper products made from alternative fibers is now a significant portion of the market. Green Seal recognizes that there are multiple paths to environmental leadership, and therefore, is considering expanding the requirements to include this newer type of sanitary paper product.

In the Rationale Document,³ Green Seal summarizes the aspects of the Georgia Tech study that evaluated the various life cycle impacts, and our conclusion that rapidly renewable fiber should also qualify as a source material for environmentally-preferable sanitary paper products if they meet similar or identical requirements as those already in GS-1. This includes limits on water and energy use.

Q: How does this definition of rapidly renewable prevent non-biodiverse forests and clearcutting?

Green Seal: An in-depth answer to this question can be found in the Rationale Document. The type of fiber we are looking at as rapidly renewable, whether wood or nonwood fiber, are grown like agricultural crops. Ensuring that they are as sustainable as recovered material requires that their production be guided by various principles and limits. For instance, a tissue product derived from a flax crop grown on land that just had a primary tropical forest cleared for the purpose could not be considered sustainable. The requirements of meeting the 2017 SAN Standards criteria will ensure the crops are sustainable.

² **Georgia Tech Study:** <http://www.green seal.org/Portals/0/Documents/Standards/GS-1/Life%20Cycle%20and%20Market%20Review%20of%20Major%20Alternative%20Fibers%20for%20Paper%20Production.%20April%202017..pdf>

³ **GS-1 Revision Rationale, 2017.** <http://www.green seal.org/Portals/0/Documents/Standards/GS-1/Rationale%20-%20GS-1%20Revision%20to%20Include%20RRFs%20Nov%202017.pdf>

Q: Several scientists have determined that trees grow faster the older they are. How can Green Seal justify the benefit of allowing spindly trees to be used as a sustainable fiber? See, for example, <https://www.livescience.com/42578-oldest-trees-grow-fastest.html>

Green Seal: The types of wood fiber that meets the rapidly renewable fiber definition are eucalyptus and acacia. These trees are grown more like crops and produce good fiber in this short cycle. The other kinds of trees, such as pine or fir, require a much longer growth time and wouldn't meet the requirement.

Q: Is it essential for the fiber from rapidly renewable fibers to come from sustainably managed forests?

Green Seal: Based on the information we have reviewed, rapidly renewable fiber will likely come from plants or trees that are grown similarly to crops, and are not grown as forests. Therefore, the fiber needs to meet the requirements in the 2017 SAN Standard.

Q: Can you provide a download link or the study?

Green Seal: The document is provided on our website.⁴

Q: In Section 3.2 of the Proposed Standard, it is not immediately clear that products made from only post-consumer recycled and RRF will be individually certifiable without the inclusion of ag residue. Will we be able to certify a blend that is say, 50% PCR and 50% Bamboo (without incorporating any ag residue)?

Green Seal: Yes. A product made from 50% post-consumer material and 50% bamboo would be eligible for certification. We may consider clarifying this point in the standard, and specifying that any combination of agricultural residue **and/or** rapidly renewable fiber is acceptable.

⁴ Georgia Tech Study: <http://www.greenseal.org/Portals/0/Documents/Standards/GS-1/Life%20Cycle%20and%20Market%20Review%20of%20Major%20Alternative%20Fibers%20for%20Paper%20Production.%20April%202017..pdf>

Questions about Green Seal's Standard Revision Process

Q: Will there be a second revised draft or will the next step be final?

Green Seal: Typically, during standard revisions, Green Seal has one Proposed Draft and then makes any necessary further changes based on new information presented by stakeholders. However, it is occasionally necessary to publish a second Proposal and conduct a second Public Comment Period. It is unknown at this time if there will be a second iteration.

Q: What is the expected timeline?

Green Seal: The Public Comment Period closes on January 29, 201. We estimate that a Responses to Comments document will be published, and the new edition of the GS-1 Standard will be issued in early March.