

Summary of referral responses to proposal for new criteria for materials in wet wipes

Here by follows the answers given to the referral document on the new criteria for wet wipes that will replace section 12 in criteria Bra Miljöval Cosmetics (2018:1) and 18 in criteria Bra Miljöval chemical products (2018:1). If needed a motivation will be included in regard to how Bra Miljöval has handled the question. The referral round was carried out during September 2023.

1.1

The comments regarding the requirements of bio-based material were positive. Among other things, they saw advantages in not having to label their products according to the Single-use Plastic Directive. It will to some extent be a challenge in replacing materials in existing products, but something the market receives as a positive.

1.2

No comments.

1.3

Regarding requirements for material from 100% FSC-certified forestry, there were comments that it is difficult to get hold of certain types of fibers marked with FSC and it is therefore desired that PEFC certification is also approved. The Swedish Society for Nature Conservation and Bra Miljöval believe that PEFC is a deficient label and therefore only allows FSC labeling at the present time. There was also a question about whether the label FSC mix is approved. Bra Miljöval does not approve FSC mix. The reason for this is that FSC mix consists of a mixture of FSC-certified material and material from "controlled wood". It is unclear what "controlled wood" means and thus Bra Miljöval assesses that FSC mix has major shortcomings regarding transparency and traceability and cannot be approved.

1.4

There were comments that questioned the benefit of labeling the product with exact fiber content and whether, for example, 0% recycled needs to be printed on the packaging. Bra Miljöval responds by stating that the fiber composition gives the consumer full information about the product and makes it easier to understand how the product should be recycled. According to the Textile Labelling and Marketing Directive article 20.3, materials that differ in fiber composition by up to 3% can be reported with the same percentage. This already allows for a certain flexibility. As for the recycled material there is no need to disclose unless used.

1.5

Comments received asked whether all wet wipes need to be tested against the standard for compostability. It is clearly stated in the requirements that it is only required if the licensee intends to market his wet wipe as biodegradable or compostable.

There were also comments that wet wipes should not be thrown in the toilet and that this should be stated on the packaging. Bra Miljöval refers to current requirements for packaging for chemical and cosmetic products.

1.6

Regarding requirements for completely chlorine-free bleaching, comments were received where they want us to approve the ECF bleaching method. Bra Miljöval answers that we will only allow TCF bleaching to avoid all AOX emissions. We understand that the supply of TCF raw materials on the market is limited, but that it should be prioritized for eco-labelled products.

1.7

No comments.

1.8

There was a comment that the requirements for chemicals should stop at REACH. Bra Miljöval, however, sees benefit in the fact that the requirement is stricter than REACH and there were other comments that thought the requirements were good as well as clearly stated.

1.9

The comments indicated that it was unclear in which part of the value chain the proposed action plan should be implemented. There were comments that were positive about timed targets in the action plan based on BAT.

Action: Bra Miljöval clarified in the criteria document that the action plan applies throughout the value chain, from pulp to cloth.

1.10

There were positive comments regarding working with waste in the production of the cloth.

Övriga kommentarer

Many generally positive comments were received regarding the conversion to bio-based and that the criteria document has become clearer.

It was flagged that flushable wipes can pose a major problem and should be avoided. In the current criteria regarding packaging, there is a requirement that there must be marking on the outside of the packaging stating that the napkin must not be thrown in the toilet.

Comments were also received regarding plastic packaging for wet wipes being negative, where Bra Miljöval refers to the current requirements for packaging for chemical and cosmetic products.