

Good Environmental Choice Australia Environmental Performance Standard

Sanitary Paper Products



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USE OF GECA STANDARDS

This standard identifies environmental, quality, regulatory and social criteria that the top products sold in the Australian marketplace can meet in order to be recognised by GECA as “environmentally preferable”.

This standard seeks to set the benchmark for environmentally preferable products. The Australian Ecolabel Program is based on the international standard ISO 14024: “Environmental Labels and Declarations - Guiding Principles” which requires environmental labelling specifications to include criteria that are objective, reasonable and verifiable.

This standard may be used by GECA appointed conformity assessment bodies to verify whether a product fully conforms to the criteria set by this standard. Where a product is certified under the Australian Ecolabel Program, it may display the GECA ecolabel (the “Environmental Choice Australia Mark”) to show that the product has been independently audited and demonstrates conformance with the environmental and social criteria detailed in this standard.

The purpose of voluntary environmental labels and declarations is the communication of verifiable and accurate information for the numerous environmental aspects of goods and services. As required by the Trade Practices Act the information cannot be misleading. Such information encourages the demand for, and supply of, those products that cause less harm to the environment, thereby stimulating the potential for market-driven continuous environmental improvement. Where a company has a product certified as conforming to this standard, it may gain a marketing advantage in government and business procurement programs, as well as greater market recognition in general because of its independently verified environmental attributes.

The principles of life cycle management have been used to set criteria to address relevant environmental loads typical in a product category. As such, this standard may also offer guidance for Australian producers to reduce the environmentally harmful impacts of their product(s). Producers may use the environmental criteria in this standard to design and refine the processing, manufacturing and delivery of their product(s). In addition producers may find other environmental issues and more measures along the product’s life cycle, which are beyond the content of this standard. Producers are encouraged to include and adapt improvements in their environment programs and designs to aim for even better environmental results where technically possible. GECA welcomes feedback where this has been achieved.

While all GECA ecolabelling standards are voluntary, nevertheless they contain criteria that address compliance with specific laws. In addition, a GECA standard may recognise specific Australian Standards. A prerequisite for certification under the GECA ecolabel is to satisfy the relevant Australian or International Standard, where it is required by law. However, Australian Standards typically define “fit-for-purpose” criteria and usually do not provide assurance of environmental preferability. GECA ecolabelling standards go beyond Australian Standards and define an environmental benchmark for the product category.

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| 3.0 | January 2015 | Revision |
| 3.0i | July 2017 | Update: "Definitions and Acronyms"; Inclusion of notes in 'How to apply for GECA Certification' and 'Social and Legal Compliance' sections. |

HOW TO APPLY FOR GECA CERTIFICATION

Manufacturers or service suppliers interested in GECA certification using the Environmental Choice Australia Ecolabel are encouraged to read carefully through the entire standard and to evaluate whether their products are likely to conform to the standard and to pass the assessment process.

To launch an application, please contact GECA by phone, email or via the GECA website (www.geca.org.au). The completed application form can be sent to GECA either by mail, fax or email.

After receiving the completed application form and the application fee, GECA refers the verification process to an appointed auditing body. The auditing body contacts the applicant and gives a clear overview of the steps needed to achieve certification for their particular product type.

Note: GECA reserves the right to refuse, suspend or postpone an application if (a) the organisation does not meet minimum compliance with Environmental Law, Labour Law, Fair Pay, Work, Health and Safety, Lawful behaviour (e.g. pending or ongoing lawsuits) (b) the organisation does not have transparent reporting that is available/accessible on request (c) the core mission of the organisation and/or product is in conflict with GECA's mission and/or is perceived by GECA to pose a risk to the GECA brand or reputation.

STRUCTURE OF THE STANDARD

Each section within this standard contains criteria and Demonstration of Conformance (DoC). The criteria state the requirements for the product and applicant company with respect to its environmental performance. The DoCs list the information required to verify compliance to the criteria. Selected sections also contain introductory text which outlines the purpose behind the criteria or the reason for its inclusion in the standard.



REQUESTING ADDITIONAL EVIDENCE

Demonstration of Conformance items are listed for each criterion. The GECA approved auditor/s will request additional information to ensure conformance on a case by case basis. Hence, the conformance items listed below are considered a guide to the minimum Demonstration of Conformance items that will be required from the applicant company.



DEFINITIONS & ACRONYMS

% w/w: Percent weight/weight, equivalent to percent by mass.

ADt: Air dry tonne of pulp (ADt) meaning dry solids content of 90 %.

Aerobically Biodegradable: A substance that is biodegradable according to AS 4351.

Anaerobically degradable: A substance that, when measured as directed in ISO 11734 "Water quality - Evaluation of the "ultimate" anaerobic biodegradability of organic compounds in digested sludge - Method by measurement of the biogas production", achieves at least 60 % degradation.

ADG: Australian Dangerous Goods.

AOX: Absorbable Organic Halogen. A measure of the quantity of chlorine (and other halogens) bound to organic compounds.

APEO: Alkylphenol ethoxylate and other alkylphenol derivatives.

Aromatic substance: In the context of this standard, aromatic substances are chemicals which contain a planar unsaturated ring of atoms that is stabilized by an interaction of the bonds forming the ring. Such compounds are typified by benzene and its derivatives.

Bioaccumulative: A substance is classified as potentially bioaccumulative if the log K_{ow} (log water/octanol partition coefficient) is equal to or greater than 3.

Biodegradable: Organic substances that decompose in the natural environment due to the action of living organisms.

CAB: Conformity Assessment Body as described by GECA's Scheme Rules. CABs are often referred to as 'auditors', however only GECA appointed auditors may be used to obtain GECA certification.

Carcinogenic: Capable of causing cancer. The International Agency for Research on Cancer is the internationally accepted body for the classification of carcinogenic substances. See www.iarc.fr

CAS Number: Chemical Abstract Service number. Unique CAS numbers are assigned to chemical compounds as a means of identification.

Chemical pulp: Pulp produced using the sulphite or sulphate (Kraft) methods (using bisulphite or sodium hydroxide liquor).

CI Number: Colour Index Number, as assigned by the Society of Dyers and Colourists and the American Association of Textile Chemists and Colourists.

Coating: Substance added to the base paper for certain qualities.

COD: Chemical Oxygen Demand - means the mass of oxygen equivalent to the amount of dichromate consumed by dissolved and suspended matter when a water sample is treated with that oxidant under defined conditions.

Dangerous Goods: Any product classifiable as dangerous according to the GHS criteria or Code of Practice for Managing Risks of Hazardous Chemicals in the Workplace or Australian Dangerous Goods (ADG) Code, including classification as an Environmentally Hazardous Substance.

Demonstration of Conformance (DoC): Defines sources of evidence acceptable to GECA to demonstrate compliance with each criterion of the standard. An applicant manufacturer must provide documentation to the appointed auditing body in order to demonstrate conformance of its products under assessment. For further information on Demonstration of Conformance requirements see *Appendix A - Evidence of Conformance* at the end of this standard.

DIP: De-inked or recycled pulp.

EDTA: Ethylenediaminetetraacetic acid or ethylenedinitrilotetraacetic acid, or any of its salts or primary derivatives.

FSC: Forest Stewardship Council.



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GEN: Global Ecolabelling Network.

GECA: Good Environmental Choice Australia Ltd.

GECA Mark: The Environmental Choice Australia Mark, the mark awarded to applicants complying with GECA ecolabelling standards after assessment by a GECA appointed auditing body. **GHS:** Global Harmonized System of Classification and Labeling of Chemicals

Halogen: Any element in Group 17 on the periodic table (previously Group VIIA). Halogens include fluorine, chlorine, bromine and iodine.

Heavy Metal: Elements including antimony (Sb), arsenic (As), cadmium (Cd), chromium (Cr), cobalt (Co), lead (Pb) mercury (Hg), and tin (Sn).

ISO: International Organisation for Standardisation.

Mechanical pulp: Pulp produced using mechanical methods, including stone groudwood, thermomechanical pulp (TMP) and chemithermomechanical pulp (CMTP).

Mutagenic: Any substance that causes mutations or genetic abnormalities. The criteria for classification of a substance as mutagenic are defined by the National Industry Chemical Notification and Assessment Scheme (NICNAS).

NO_x: chemical abbreviation for nitrogen oxides (NO, N₂O and NO₂). In this document NO_x means total NO and NO₂ measured as NO₂ equivalents.

P: Chemical abbreviation for phosphorus. In this document P means phosphorus discharge to water.

Packaging: Materials used for the transport, containment or display of products.

PEFC. Programme for the Endorsement of Forest Certification.

Post-Consumer Material: Material generated by households or by commercial, industrial and institutional facilities in their role as end-users of the product which can no longer be used for its intended purpose. This includes returns of material from the distribution chain.

Pre-Consumer Material: Pre-consumer (sometimes also referred to as post-industrial) material is recovered from the manufacturing process before it is sold to end consumers.

Producer / Manufacturer: For the purpose of this standard these terms comprise both manufacturers of a product as well as service suppliers. These may not necessary be the companies that apply for GECA certification, since certification can also be awarded to retailers of a product. However, for some criteria it is required that the original manufacturer of the product conforms to particular requirements.

Readily biodegradable: Readily biodegradable surfactants are those where the average level of biodegradation observed in an aerobic sewage treatment plant is at least 90% during a residence time of not more than 3 hours. In order to meet this requirement the surfactant must either meet the requirement for "readily biodegradable" when determined using one of the five test methods described in the OECD Guidelines for Testing of Chemicals, Test Guidelines 301A-301E OR are readily biodegradable according to AS 4351.

Recycled Content: Denotes the proportion of a product that is generated from post-consumer and pre-consumer material.

S: chemical abbreviation for elemental sulphur. In this document S means all forms of gaseous sulphur emissions to air.

SDS: Safety Data Sheet (formally Material Safety Data Sheet – MSDS). Contains information relating to the composition, classification and risk assessment of the product. To qualify as suitable, the SDS and information therein must not be more the 5-years old.

Surfactant or "Surface-Active Agent": Any substance which is intended to reduce surface tension thereby helping water to surround and remove dirt or staining from surfaces.

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Teratogenic: Any substance capable of causing heritable genetic damage, producing congenital deformations or causing birth defects. The criteria for classification of a substance as teratogenic are defined by the National Industry Chemical Notification and Assessment Scheme (NICNAS).

VOC: Volatile Organic Compounds; any organic compound (compound which contains carbon) with a boiling point below 250°C measured at 101.3kPa. VOC content of products will be calculated according to the content of ingredients that fit this definition.

Note: all percentages described in this document are to be measured as per cent by mass.



BACKGROUND

A GECA product standard sets limits for the most material environmental loads attributable to goods and / or services throughout their life cycle. This particular standard seeks to set an environmental benchmark for sanitary paper products. The scope is intended to cover sanitary paper products sold in the Australian market. The criteria are used for environmental labelling, implemented by Good Environmental Choice Australia (GECA) as part of the Australian Ecolabelling program. This Standard is voluntary, and after verification, enables certified products to display an environmental label (ecolabel) as implemented by GECA to show it is environmentally preferable.

Paper products have the potential to create significant environmental impacts throughout their life-cycle, from raw material sourcing and manufacturing of pulp and paper to the disposal of the paper product. These impacts can include forest management practices such as unsustainable management of native forests; effluents from the manufacturing processes containing oxygen depleting substances that effect plants and animals in receiving waters; release of toxic and bioaccumulative substances including for example sulphurous compounds and halogenated organics (from e.g. bleaching); usage of significant amounts energy and production of greenhouse gases during pulp and paper manufacturing processes; and impact from the packaging and disposal of the product at the end of its life.

The standard aims at promoting:

- The application of sustainable management principles in order to safeguard forests and other areas used to obtain fibre raw materials. It is important that operations are managed in a way that minimises disturbance of natural eco-systems and conserves biodiversity. Third party certification is a useful tool to verify sustainable forest management.
- The reduction of emissions to air and water of certain toxic or otherwise polluting substances (e.g. oxygen depleting substances, halogenated organics, phosphorus, sulphurous and nitrogen compounds).
- The reduction of environmental damage or risks related to the use of energy (global warming, acidification, ozone depletion, depletion of non-renewable resources) by reducing energy usage and encouraging energy from renewable resources.
- The reduction of environmental damage or risks related to the use of hazardous chemicals.
- Improved waste management as considerable quantities of waste may be generated between the raw material stage and the completed paper product.



STANDARD CATEGORY SCOPE

Criterion 1: The scope of this standard is applicable to sanitary paper products, including:

- Toilet paper
- Facial tissues
- Paper towels, hand towels
- Table napkins
- General purpose wipes
- Table coverings, placemats, tray liners

The sanitary paper product must comprise at least 95% of materials that are covered by criteria in this standard.

Exclusions and Notes

This standard does not include nonwoven sanitary products, disposable diapers, and sanitary napkins and tampons.

Demonstration of Conformance

DoC 1.1: A description of the product(s) or product range as they apply to the scope of this standard, accompanied by a list including the type of fibre/raw material used, the location of pulp and paper mills, the location of manufacturing sites.



FITNESS FOR PURPOSE

To be certified, the product(s) must be fit to perform its intended purpose or application. A minimum level of quality and durability is implicit before the GECA ecolabel can be displayed on the product. The applicant must ensure that the product is fit for its intended purpose.

Applicable Standards and Demonstrated Performance

Criterion 2: The product must be fit for its intended purpose and must meet performance requirements of relevant Australian or international standards, or prove fitness for purpose with other appropriate documentation.

Demonstration of Conformance

DoC 2.1: Documentation identifying applicable standards or performance requirements, and test reports and other relevant documentation to demonstrate that standards and requirements are met and maintained.

Product Safety

End-users can be exposed to harmful chemicals released from the final product during its use-phase.

Criterion 3: Products made from recycled fibres or mixtures of recycled and virgin fibres shall not contain more than:

- Formaldehyde: 1 mg/dm²
- Glyoxal: 1,5 mg/dm²
- PCP: 0.15 mg/kg
- PCB: 0.05 mg/kg

Demonstration of Conformance

DoC 3.1: Test reports showing that the limits are met. Test methods to be used:

- Formaldehyde - EN 1541:2001 Paper and board intended to come into contact with foodstuffs. Determination of formaldehyde in an aqueous extract.
- Glyoxal - DIN 54603 Testing of paper, paperboard and board - Determination of glyoxal content.
- PCP - ISO 15320:2011 Pulp, paper and board -- Determination of pentachlorophenol in an aqueous extract.
- PCB - ISO 15318:1999 Pulp, paper and board - Determination of 7 specified polychlorinated biphenyls (PCB).

Criterion 4: All tissue products must fulfil the following requirements:

- Slimicides and antimicrobial substances: No growth retardance of micro-organisms.
- Dyes: No bleeding.

Demonstration of Conformance

DoC 4.1: Test reports showing that the limits are met. Test methods to be used:

- Slimicides and antimicrobial substances - EN 1104:2005 Paper and board intended to come into contact with foodstuffs. Determination of the transfer of antimicrobial constituents.
- Bleeding of dyes - EN 646:2006 Paper and board intended to come into contact with foodstuffs. Determination of colour fastness of dyed paper and board. Level 4 is required.



MATERIAL REQUIREMENTS

The criteria in this section are intended to address impacts that may occur over the life cycle of a product that can be avoided or mitigated during the design phase of product development.

Unless otherwise stated, the requirements in this section apply to each type of material contained in the finished product regardless of weight.

Fibre Raw Materials

The sourcing of fibre input materials for pulp and paper manufacturing can have significant environmental impacts. Applying sustainable management principles helps safeguarding forests and other areas used to obtain fibre raw materials.

Criterion 5: The fibre input material in the paper component may be recycled or virgin fibre. All fibre sources must fulfil one or a combination of the following requirements i-vi.

i. Virgin Wood Fibre:

All virgin fibre input from native forests must be sourced from forests that are certified under FSC or PEFC as sustainably managed (or equivalent certification); and

All virgin wood fibre must be covered by valid sustainable forest management and chain of custody certificates issued by an independent third party certification scheme such as FSC, PEFC or equivalent.

However, where certification schemes allow mixing of certified material, recycled materials and uncertified material in a product or product line, at least 50 % of the fibre in the finished product must be from either plantations or forests that are certified. Any uncertified material must be covered by a verification system which ensures that it is legally sourced and meets any other requirement of the certification scheme with respect to uncertified material. The certification bodies issuing forest and/or chain of custody certificates shall be accredited/recognised by that certification scheme;

ii. Recycled Fibre:

Fibre material is 100% derived from recycled sources with a minimum 50% from post-consumer sources;

iii. Waste Fibre:

Fibre material is 100% derived from pre-consumer waste such as sawdust/woodchips and waste wood from wood processing operations, forest harvesting waste, untreated demolition wood, agricultural waste, sugarcane bagasse etc.

All waste wood from native forests must be sources from forests that are certified under a forest certification scheme.

iv. Bamboo:

If more than 20% of the overall fibre material is derived from bamboo, the following has to be fulfilled:

50% of virgin bamboo fibre used in the product must come from plantations or forests certified as sustainably managed under a certification scheme (FSC, PEFC, or equivalent), OR

All bamboo fibre used in the product must originate from certified organic plantations OR

It must be shown that no bamboo fibre is derived from illegal sources or protected areas, or areas that are under investigation as to their protection status; or areas where ownership or rights of exploitation are unclear; or bamboo species that appear on the Convention on International Trade in Endangered Species (CITES) list.



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v. Other virgin fibre (non-wood, non-bamboo):

100% of other virgin (non-wood, non-bamboo) plant-based fibre originates from certified organic plantations (e.g. for cotton, hemp); or it can be demonstrated that a procedure is in place for the procurement of sustainable fibre raw materials, and that all fibre raw materials are traceable, and not derived from illegal sources, or protected areas, or areas that are under investigation as to their protection status; or areas where ownership or rights of exploitation are unclear, and that fibre management does not harm natural woodland, biodiversity, special ecosystems and important ecological functions;

Demonstration of Conformance

DoC 5.1: Signed declaration of compliance, supported by documentation that demonstrates the proportion of fibre types included and geographic origin (country/state and region/province) of the wood and fibre raw material that is used in each product; plus

- for i: relevant certificates or other evidence on forest management certification and chain of custody (to confirm the virgin fibre that is used is from a certified sustainably managed source); and relevant certificates or other evidence to confirm that the wood originates from legal sources;
- for ii, recycled fibre: documentation that demonstrates whether the fibre is pre or post-consumer; includes any relevant certificates (e.g. FSC Recycled);
- for iii: documentation that demonstrates the waste wood source of the fibre (including relevant information and documentation); source of all waste wood together with evidence of certification (sustainable forest management) if wood waste originates from native forests;
- For iv: nature and geographical source of all virgin bamboo fibre inputs together with for (a) Relevant forest certification scheme certificates; or for (b) evidence that fibre comes from certified organic plantations; or (c) relevant procurement procedures, and documents and certificates showing legal sources for the bamboo, and declaration that bamboo species do not appear on the CITES list;
- For v: nature and geographical source of all virgin fibre inputs together with relevant certificates or other evidence that fibre comes from certified organic plantations; or certification, harvesting permits or other information to demonstrate that the fibre is legally harvested and does not come from protected areas or areas where ownership rights are in dispute; documentation that describes the procedure for the procurement of sustainable fibre raw materials.

Non-Fibrous Raw Materials

Criterion 6: Starch products shall not be derived from genetically modified material, e.g. certain potato and maize starches.

Demonstration of Conformance

DoC 6.1: Signed declaration from the producer/supplier of the starch product.



HAZARDOUS MATERIALS

The criteria in this section are intended to address some of the main hazardous substances found across this product category which may be added to the final product or to product ingredients during manufacturing. The intention is to reduce the use of hazardous materials and to prevent pollutants entering the environment and to protect human health.

This section covers chemicals and substances used in the production of pulp and paper, and chemicals used in the manufacturing process of the final product.

Banned Substances

The use of harmful chemicals can affect the health of manufacturing staff and users of the finished product as well as negatively impact the environment.

Criterion 7: Substances or mixtures classified with Risk-phrases and Hazard Statements listed in Table 1 or listed below must not be used in the pulp and paper production process or the production of the final product (where applicable); or be found on the final product.

Table 1 Hazard statements and R-phrases for banned substances

| Acute toxicity and specific organ toxicity | | | | | |
|--|--|----------|------------|---|--|
| H300 | Fatal if swallowed | R28 | H370 | Causes damage to organs | R39/23, R39/24, R39/25, R39/26, R39/27, R39/28 |
| H301 | Toxic if swallowed | R25 | | | |
| H304 | May be fatal if swallowed and enters airways | R65 | H371 | May cause damage to organs | R48/20, R48/21, R48/22 |
| H310 | Fatal in contact with skin | R27 | H372 | Causes damages to organs | R48/25, R48/24, R48/23 |
| H311 | Toxic in contact with skin | R24 | | | |
| H330 | Fatal if inhaled | R23/26 | | | |
| H331 | Toxic if inhaled | R23 | | | |
| Respiratory and skin sensitisation | | | | | |
| H317 | May cause allergic skin reaction | R43 | H334 | May cause allergy or asthma symptoms or breathing difficulties if inhaled | R42 |
| Carcinogenic, mutagenic or toxic for reproduction | | | | | |
| H340 | May cause genetic defects | R46 | H360 | May damage fertility or the unborn child | R60, R61 |
| H341 | Suspected of causing genetic defects | R68 | H361 | Suspected of damaging fertility or the unborn child | R62, R63 |
| H350 | May cause cancer | R45, R49 | H362 | May cause harm to breast-fed children | R64 |
| H351 | Suspected of causing cancer | R40 | | | |
| Hazardous to the environment | | | | | |
| H400 | Very toxic to aquatic life | R50 | H413 | May cause long-lasting effects to aquatic life | R53 |
| H410 | Very toxic to aquatic life with long-lasting effects | R50/53 | H420/EUH59 | Harms public health and the environment by destroying ozone in the upper atmosphere | R59 |
| H411 | Toxic to aquatic life with long-lasting effects. | R51/53 | | | |
| H412 | Harmful to aquatic life with long-lasting effects | R52/53 | | | |

or

- EU C/M/R; or
- IARC Group 1* and 2A; or
- Substances/mixtures classified as dangerous good; or
- Substances of Very High Concern listed on the REACH Candidate list (available at http://echa.europa.eu/chem_data/authorisation_process/candidate_list_table_en.asp)



Exemptions:

- Biocides exempt from ban on ecotoxic substances (addressed in criterion 14);
- Foam inhibitors, cleaning, washing and deinking chemicals exempt from ban on ecotoxic substances (addressed in criterion 16-18);
- Peracetic acid (bleaching agent);
- Chemicals that are 100% inorganic (e.g. NaOH);
- Cationic polymers and dyes exempt from the ban on ecotoxic substances if the classification is due to the cationic charge;
- Chemicals with a consumption of less than 0.05 kg/tonne pulp product, toluene for use in rotogravure printing processes.

Demonstration of Conformance

DoC 7.1: Signed declaration of conformance supported by documentation identifying hazardous substances used in materials and production processes or demonstrating by providing data that no substances with classifications listed in table 1 are used.

Alkylphenol ethoxylates (APEOs)

Criterion 8: Alkylphenol ethoxylates or other alkylphenol derivatives (substances that produce alkylphenols upon degradation) must not be added to cleaning chemicals, de-inking chemicals, foam inhibitors, dispersants, coatings, retention agents, flocculants, foam inhibitors/defoamers, wet strength agents, dyes, toners, or adhesives.

Demonstration of Conformance

DoC 8.1: Signed declaration of conformance from the relevant supplier(s) supported by relevant documentation (e.g. ingredients list, SDS).

Elemental Chlorine

Criterion 9: Chlorine gas must not be used as a bleaching agent.

Demonstration of Conformance

DoC 9.1: Signed declaration of conformance from the pulp producer. It is accepted that recycled fibres may have been bleached with chlorine gas in their previous life-cycle.

Complexing Agents

Criterion 10: The complexing agents ethylene diamine tetraacetic acid (EDTA) or diethylene triamine pentaacetic acid DTPA must not be used in quantities larger than 2.5 kg per ton of pulp. If ≥ 1 kg of EDTA/DTPA (active substance) is used per ton of pulp, it must be reported on the emissions of EDTA/DTPA to the recipient environment.

Demonstration of Conformance

DoC 10.1: Signed declaration from the pulp/paper producer and/or relevant supplier(s) that EDTA/DTPA are not used; or

DoC 10.2: . Documentation stating the use/quantities and, if applicable, emissions of DTPA/EDTA from pulp production, measurement result, method of analysis, frequency of measurement, laboratory name and laboratory compliance.

Dyes, Inks, Pigments, Coatings, Foils, Laminates

Certain additions to the product such as dyes, pigments and coatings can contain substances that pose a risk to human and the environment.



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Criterion 11: No dyes, pigments or coatings must be used that contain phthalates (that at the time of application are classified with risk phrases H360, H361), mercury, lead, copper, chromium, nickel, aluminium or cadmium as constituent parts. Copper phthalocyanine dyes or pigments may, however, be used.

The levels of ionic impurities in the dyes and pigments used must not exceed the following: Ag 100 ppm; As 50 ppm; Ba 100 ppm; Cd 20 ppm; Co 500 ppm; Cr 100 ppm; Cu 250 ppm; Fe 2,500 ppm; Hg 4 ppm; Mn 1,000 ppm; Ni 200 ppm; Pb 100 ppm; Se 20 ppm; Sb 50 ppm; Zn 1,500 ppm.

Demonstration of Conformance

DoC 11.1: Declaration of Conformance from the supplier(s) supported by documentation that identifies the dyes, pigments and coatings used; and

DoC 11.2: Relevant SDSs and other information demonstrating the level of impurities, if applicable.

Criterion 12: Acrylamide monomer must not be present as a constituent part of coatings.

Demonstration of Conformance

DoC 12.1: Relevant SDSs, demonstrating that no acrylamide monomer is used.

Criterion 13: Azo dyes or pigments which may release one of the amines listed in Table 2 must not be used. An indicative list of dyes that may cleave to the restricted amines is listed in Appendix B and can be used as a guide to dyes that should not be used.

Table 2 Restricted amines

| Substance | CAS Number |
|---|------------|
| 2,4,5-trimethylaniline | 137-17-7 |
| 2,4-diaminoanisole | 615-05-4 |
| 2,4-diaminotoluene | 95-80-7 |
| 2,4-xylidine | 87-62-7 |
| 2,6-xylidine | 95-68-1 |
| 2-amino-4-nitrotoluene | 99-55-8 |
| 2-naphthylamine | 91-59-8 |
| 3,3'-dichlorobenzidine | 91-94-1 |
| 3,3'-dimethoxybenzidine | 119-90-4 |
| 3,3'-dimethyl-4,4'-diaminodiphenylmethane | 838-88-0 |
| 3,3'-dimethylbenzidine | 119-93-7 |
| 4,4'-diaminodiphenylmethane | 101-77-9 |
| 4,4'-methylene-bis-(2-chloraniline) | 101-14-4 |
| 4,4'-oxydianiline | 101-80-4 |
| 4,4'-thiodianiline | 139-65-1 |
| 4-aminoazobenzene | 60-09-3 |
| 4-aminobiphenyl | 92-67-1 |
| 4-chloro-o-toluidine | 95-69-2 |
| Benzidine | 92-87-5 |
| o-amino-azotoluene | 97-56-3 |
| o-anisidine | 90-04-0 |
| o-toluidine | 95-53-4 |
| p-chloroaniline | 106-47-8 |
| p-cresidine | 120-71-8 |

Demonstration of Conformance

DoC 13.1: Documentation that identifies the azo dyes or pigments used.



Biocides

Although valuable, certain biocides are harmful to human and environmental health.

Criterion 14: Biocides (used to counter slime forming organism in the circulation water, or used to preserve the product) must not be potentially bioaccumulative. A substance is classified as potentially bioaccumulative if the log K_{ow} (log octanol/water partition coefficient) is equal to or greater than 3.

Demonstration of Conformance

DoC 14.1: The applicant shall provide copies of the material safety data sheets for all biocides used during the different production stages, together with a documentation of the concentrations of the biocides in the final product.

Surfactants, Washing and Cleaning Agents and Foam Inhibitors

Certain substances used for washing and cleaning in the paper manufacturing process can contain substances that pose a risk to human and the environment.

Criterion 15: Solvents, washing agents and/or cleaning chemicals used in the cleaning of production/manufacturing equipment and/or used for printing must not contain alkylphenol ethoxylates (APEOs) or other alkylphenol derivatives, halogenated solvents classified with any categories listed in Table 1, and/or phthalates (that at the time of application are classified with risk phrases H360, H361).

Demonstration of Conformance

DoC 15.1: Declaration of Conformance from the supplier(s) supported by SDS and/or other documentation that identifies the preparation(s) used.

Criterion 16: Where surfactants are used for de-inking recycled paper input, these surfactants shall be readily biodegradable.

Demonstration of Conformance

DoC 16.1: List all surfactants used together with relevant test reports showing that the surfactant is readily biodegradable.

Criterion 17: None of the constituent substances that have a foam inhibiting or foam retarding effect in foam inhibitors/defoamers must be classified as environmentally hazardous in accordance with Table 1. As an alternative, foam inhibitors/defoamers for which 95% by weight of the constituent substances with a foam inhibiting or foam retarding effect are either readily or ultimately biodegradable, may be used. Foam inhibitors/defoamers that are destroyed in chemical recycling are exempted from this requirement.

Demonstration of Conformance

DoC 17.1: List all substances with foam inhibiting or foam retarding effects together with SDSs and relevant test reports showing that the surfactant is readily or ultimately biodegradable, or, if applicable, evidence demonstrating that the foam inhibitors/defoamers are destroyed in chemical recycling.

Wet Strength Agents

Wet strength agents are added to certain products to increase their strength when coming into contact with water or other liquids.

Criterion 18: The sum of the chloro-organic substances epichlorohydrin (ECH), 1,3-dichloro-2-propanol (DCP) and 3-monochloro-1,2-propanediol (MCPD) must not comprise more than 7000 ppm (0.7 %) of the wet strength agents.

Demonstration of Conformance



DoC 18.1: SDS of the wet-strength agent and other relevant information that can be used to calculate the percentage of the above mentioned chloro-organic substances.

Other Chemical Additives

Criterion 19: Any other additives, such as lotions, fragrances or softeners, added to sanitary paper products must meet the relevant criteria in the Materials Requirements and Hazardous Material section of GECA's Personal Care Products standard (PCPv4.1-2013).

Demonstration of Conformance

DoC 19.1: List of additives used identifying applicable criteria of the PCPv4.1-2013 standard together with the DoC required for the relevant criteria.



AIR AND WATER EMISSIONS

Pulp mills, boilers, on-site power plants and other manufacturing processes can cause emissions of a range of air and water pollutants and it is important that appropriate emission limits are met.

Emission of COD, NO_x, P and S

A concern related to paper manufacturing is the emissions of potentially acidifying, eutrophying pollutants and ozone precursors, such as sulphur or phosphorus compounds, and nitrogen oxides.

Criterion 20: Emissions to air and/or water from the production of pulp and paper, finished paper, laminating papers, or board production must be specified in terms of emissions points scores for each of four parameters (P_{COD}, P_P, P_S, P_{NO_x}) according to the following. Water emissions relate to COD and P (phosphorus), and air emissions relate to S and NO_x.

None of the individual points P_{COD}, P_S, P_{NO_x}, P_P shall exceed 1,5.

The total number of points (P_{total} = P_{COD} + P_S + P_{NO_x} + P_P) shall not exceed 4,0.

The calculation of P_{COD} shall be made as follows (the calculations of P_S, P_{NO_x}, P_P shall be made in exactly the same manner).

P_{COD} shall be calculated in the following way (P_P, P_S and P_{NO_x} are calculated in the same way):

$$P_{COD} = \frac{COD_{total}}{COD_{ref.total}} = \frac{\sum_{i=1}^n [pulp_i \times COD_{pulp(i)}] + COD_{paper\ machine}}{\sum_{i=1}^n [pulp_i \times COD_{ref\ pulp\ (i)}] + COD_{ref\ paper\ machine}}$$

P_{COD} = Point Score for COD

COD_{total} = Total emissions from the production of ecolabelled paper.

COD_{reftotal} = The weighted sum of reference values for pulps and reference value for the paper machine.

COD_{pulp(i)} = COD emissions from pulp i.

COD_{papermachine} = COD emissions from paper machine.

COD_{refpulp(i)} = Reference value for pulp i (see table below).

COD_{refpapermachine} = Reference value for the paper machine (see ref value for Tissue Paper in table below).

pulp_i = Proportion of the pulp type expressed as "tonne 90% pulp per tonne total pulp mix" following the elimination of filler.

n = Number of constituent pulps.

i = Index of each individual pulp and runs from 1 to n.

- For each pulp 'i' used, the related measured COD emissions (COD_{pulp i} expressed in kg/air dried tonne — ADT), shall be weighted according to the proportion of each pulp used (pulp 'i', with respect to air dried tonne of pulp, or paper), and summed together.
- The weighted COD emission for the pulps is then added to the measured COD emission from the paper production to give a total COD emission, COD_{total}.
- The weighted COD reference value for the pulp production shall be calculated in the same manner, as the sum of the weighted reference values for each used and added to the reference value for the paper production to give a total COD reference value COD_{ref,total}. The reference values for each pulp used and for the paper production are given in the Table 3.
- The total COD emission shall be divided by the total COD reference value (as shown in the formulas).



Table 3 Reference Values

| Pulp Grade/Paper/Board | Emissions (kg/ADT) | | | |
|--|--------------------------|------------------------|--------------------------|------------------------|
| | COD _{reference} | S _{reference} | NO _{xreference} | P _{reference} |
| Bleached Chemical Pulp (other than sulphite) | 18 | 1.5 | 2.0 | 0.045* |
| Bleached Chemical Pulp (sulphite) | 25 | 1.5 | 2.0 | 0.045 |
| Unbleached chemical pulp | 10 | 1.5 | 2.0 | 0.04 |
| CTMP | 15 | 0.2 | 0.3 | 0.01 |
| TMP/groundwood pulp | 3 | 0.2 | 0.3 | 0.01 |
| Recycled fibre pulp | 4 | 0.2 | 0.3 | 0.01 |
| Tissue paper/paper product | 2 | 0.3 | 0.5 | 0.01 |

* Exemption from this level, up to a level of 0.1 may be given were it can be demonstrated that the higher level of P is due to P naturally occurring in the wood pulp.

In case of a co-generation of heat and electricity at the same plant the emissions of S and NOx resulting from electricity generation can be subtracted from the total amount. The following equation can be used to calculate the proportion of the emissions resulting from electricity generation:

$$2 \times \frac{MWh(electricity)}{[2 \times MWh(electricity) + MWh(heat)]}$$

The electricity in this calculation is the electricity produced at the co-generation plant. The heat in this calculation is the net heat delivered from the power plant to the pulp/paper production.

Demonstration of Conformance

DoC 20.1: Signed declaration of compliance, supported by documentation that includes:

- Detailed calculations showing compliance to this criterion
- Relevant documentation and test reports using the following test methods: COD: ISO 6060; NOx: ISO 11564; S(oxid.): EPA no.8; S(red.): EPA no 16A; S content in oil: ISO 8754; S content in coal: ISO 351; P: EN ISO 6878.

The supporting documentation shall include an indication of the measurement frequency and the calculation of the points for COD, S and NOx. It shall include all emissions of S and NOx which occur during the production of pulp, paper and/or board, including steam generated outside the production site, except those emissions related to the production of electricity. Measurements shall include recovery boilers, lime kilns, steam boilers and destructor furnaces for strong smelling gases. Diffuse emissions shall be taken into account. Reported emission values for S to air shall include both oxidised and reduced S emissions (dimethyl sulphide, methyl mercaptan, hydrogen sulphide and the like). The S emissions related to the heat energy generation from oil, coal and other external fuels with known S content may be calculated instead of measured, and shall be taken into account.

Measurements of emissions to water shall be taken on unfiltered and unsettled samples either after treatment at the plant or after treatment by a public treatment plant. The period for the measurements shall be based on the production during 12 months. In case of a new or a rebuilt production plant, the measurements shall be based on at least 45 subsequent days of stable running of the plant. The measurement shall be representative of the respective campaign.

In case of integrated mills, due to the difficulties in getting separate emission figures for pulp, laminating paper and board, if only a combined figure for pulp, laminating paper and board production is available, the emission values for pulp(s) shall be set to zero and the figure for the board mill shall include both pulp, laminating paper and board production.



AOX Emission

Halogenated compounds, assessed using the parameter 'Adsorbable Organic Halides' (AOX), can have acute, chronic and mutagenic toxic effects on aquatic life. One of the main sources of AOX discharges world-wide is the bleaching process within the pulp and paper industry.

Criterion 21: The weighted average value of AOX released from the pulps used in the paper product must not exceed 0.17 kg/tonne paper. AOX emissions from each individual pulp used in the paper must not exceed 0.25 kg/tonne.

Demonstration of Conformance

DoC 21.1: Test reports using the following test method: AOX ISO 9562 accompanied by detailed calculations showing compliance with this criterion, together with related supporting documentation.

The supporting documentation shall include an indication of the measurement frequency. AOX shall only be measured in processes where chlorine compounds are used for the bleaching of the pulp. AOX need not be measured in the effluent from non-integrated board production or in the effluents from pulp production without bleaching or where the bleaching is performed with chlorine-free substances.

Measurements shall be taken on unfiltered and unsettled samples either after treatment at the plant or after treatment by a public treatment plant. The period for the measurements shall be based on the production during 12 months. In case of a new or a re-built production plant, the measurements shall be based on at least 45 subsequent days of stable running of the plant. The measurement shall be representative of the respective campaign.

Greenhouse Gas Emissions

Climate change is affecting both human and natural systems. In Australia, key risks include loss of ecosystems such as coral reef systems, extreme weather events and rising sea levels. Effective emission reduction and adaptation measures can help reduce the impacts of climate change.

Greenhouse gas emissions from heating and production of electricity

Criterion 22: The emission of CO₂-e from non-renewable sources, including purchased electricity and fossil fuel used for heating and production of electricity, must not exceed the following limit values (kg CO₂ -e /tonne paper substrate):

- **De-Inked Pulp (DIP)/recycled pulp:** 1000 kg CO₂ -e/tonne of paper produced from DIP pulp;
- **Chemical Pulp:** 900 kg CO₂ -e/tonne pf paper produced from chemical pulp;
- **Mechanical Pulp:** 1500 kg CO₂ -e/tonne of paper produced from mechanical pulp.

For paper/board comprising a mixture of chemical pulp, recycled fibre and mechanical pulp, a weighted limit value is calculated, based on the proportion of each pulp type. Fillers are excluded from this calculation.

The emissions shall be calculated as the sum of the emissions from the pulp production and paper/board production.

Demonstration of Conformance

DoC 22.1: Signed declaration of compliance, supported by documentation that includes:

- Detailed calculations showing compliance to this criterion; CO₂ from surplus energy that is sold off in the form of electricity, steam or heat, is subtracted from total emissions.
- Data on the air emissions of carbon dioxide. This shall include all sources of non-renewable fuels during the production of pulp and board, including the emissions from the production of electricity (whether on-site or off-site).

Factors to determine carbon dioxide contributions of different fuel types and from purchased electricity must be in accordance with the Australian National Greenhouse Accounts Factors.*

http://www.climatechange.gov.au/sites/climatechange/files/documents/07_2013/national-greenhouse-accounts-factors-july-2013.pdf.



Good Environmental Choice Australia Standard

* The most recent version should be used for the calculations. Products that are manufactured outside Australia may use the appropriate national greenhouse accounts factors for the relevant country.

Greenhouse gas emissions from transportation and distribution

Criterion 23: The paper manufacturer shall supply calculations of the total CO₂ impact of all forms of transport from the forest to the paper mill. The calculation shall contain:

Transport of raw material:

- Transport of felled timber from the forest (loading area) to the pulp mill.
- Transport of felled timber to the saw/chip plant (average figures).
- Transport of wood chips to the pulp mill (average figures).
- Transport of purchased market pulp.
- Transport of the following raw materials from the supplier: filler, pigment and starch (if the quantities exceed 10 kg/tonne produced pulp/paper).
- Transport of recycled fibre from a central depot to the pulp plant.

Transport from paper mill to conversion plant are not considered in calculations.

Demonstration of Conformance

DoC 23.1: Documentation showing that the paper manufacturer is already reporting on Greenhouse Gas emissions from transportation; or

DoC 23.2: Calculation of annual carbon dioxide emissions given in kg CO₂/tonne paper grade or kg CO₂/tonne of the mill's total annual production. Details of how the CO₂ values are calculated with reference to any assumption, the use of databases and suchlike.



ENERGY MANAGEMENT

The paper industry is a large energy user and in Australia a large part of the energy used in pulp and paper mills may come from fossil fuels such as coal. Energy efficiency and reduction of fossil fuel usage is an important goal and can be achieved in a number of ways, e.g. co-generation of heat and electricity, or use of renewable energy.

Criterion 24: The paper manufacturer(s), paper convertor and licence applicant/holder must have effective energy management policies and procedures and/or an energy management program.

Licence holders must report on energy management, this should include:

- total energy use;
- breakdown of total energy use to types of energy used;
- energy use related to production;
- initiatives taken to reduce energy use and improve energy efficiency; and
- initiatives taken to calculate and reduce CO₂ emissions associated with energy use

Demonstration of Conformance

DoC 24.1: Declaration by the Chief Executive Officer or other authorised representative of the applicant company/licence holder accompanied by documentation that: describes the energy management policies, procedures and programmes; and includes reports on energy use and management.

WATER USAGE

As water is one of the main elements for paper manufacturing, reduction of water usage is essential, especially in regions with scarce water resources.

Criterion 25: The paper manufacturer(s), paper convertor and licence applicant/holder must have effective water management policies and procedures and/or a water management program.

Licence holders must report on water management, including:

- total water use; and
- initiatives taken to reduce water use and improve water efficiency.

DoC 25.1: Declaration of conformance signed by the Chief Executive Officer or other authorised representative of the applicant company/licence holder accompanied by documentation that:

- describes the water management policies, procedures and programmes; and
- includes reports on water use and management.

WASTE MANAGEMENT

Criterion 26: All pulp and paper production sites, and facilities where the final product is produced must have a system for handling waste (as defined by the relevant regulatory authorities of the pulp and board production sites in question) and residual products arising from the production of the eco- labelled product. This should include documented procedures regarding:

- handling, collection, separation and use of recyclable materials from the waste stream; and
- recovery of materials for other uses, such as incineration for raising process steam or heating, or agricultural use;



- handling, collection, separation and disposal of hazardous waste, as defined by the relevant local and national regulatory authorities.

Demonstration of Conformance

DoC 26.1: Detailed description of the procedures adopted for the waste management of each of the sites concerned and a declaration of compliance with the criterion.

ENVIRONMENTAL MANAGEMENT SYSTEMS

An Environmental Management System (EMS) integrates procedures and processes for training of personnel, monitoring and reporting of environmental performance information to stakeholders of an organisation.

Criterion 27: The applicant / manufacturer must have an Environmental Management System in place.

Demonstration of Conformance

DoC 27.1: Documentation showing that an EMS is in place at the relevant manufacturing sites.



DESIGN FOR ENVIRONMENT

Packaging

Criterion 28: Outer packaging must not be impregnated, labelled, coated or otherwise treated in a manner, which would prevent recycling (i.e. PVC sleeves, metallic labels).

Packaging must comply with at least one of the following:

- Each material constituting >20% by weight of the total primary and secondary packaging used, must contain at least 50% recycled content by weight;
- Each material constituting >20% by weight of the total primary and secondary packaging used, must be derived from plant-based materials (e.g. PLA plastics); or
- Each separable item constituting >20% by weight of the total primary and secondary packaging, must be recyclable in Australia. This may be demonstrated using the Australian Packaging Covenant's Packaging Recyclability Evaluation Portal (PREP)¹.

Paper and cardboard packaging must be either certified under recognised forest certification scheme (e.g. FSC or PEFC) or contain at least 30% recycled content by weight.

Material used for the transport of products (tertiary packaging) and whose disposal is not the responsibility of the end consumer may be exempt from the above requirements if they are re-used by the applicant, or are recyclable in specialist recycling facilities.

Demonstration of Conformance

DoC 28.1: Details of materials used as packaging, including information on the input of recycled and virgin materials reported by weight if applicable. The recycled content can be averaged over a 12-month period to find the amount or range of recycled content; and / or

DoC 28.2: Evidence of recyclability or copy of PREP Assessment Report; and/or

DoC 28.3: Evidence of certification under relevant forest certification scheme; and/or

DoC 28.4: Details of re-use programs for transport materials within the applicant company.

¹ www.prep.org.au



ENVIRONMENTAL CLAIMS

Environmental claims are one of the tools utilised by consumers when attempting to make environmentally preferable choices and therefore it is essential that such claims are true and substantiated.

Criterion 29: Public claims made by the licence applicant / holder regarding a product's environmental performance that are beyond the scope of this standard (other than GECA certified content) shall be independently verified as compliant with ISO 14021: Environmental Labels and Declarations - Self Declared Environmental Claims (Type II Environmental Labelling) requirements. Also refer to the GECA Scheme Rules for the Use of the Environmental Choice Australia Mark.

Demonstration of Conformance

DoC 29.1: Report or statement from the applicant listing all public environmental claims regarding the product by the applicant demonstrating compliance to ISO14021; and

DoC 29.2: A signed declaration from the Chief Executive Officer or authorised representative of the relevant company (e.g. the supplier) stating that any environmental claims made by the company regarding the product in the future will be verified using ISO 14021 and / or GECA certification

SOCIAL AND LEGAL COMPLIANCE

This section addresses compliance with law and the societal attributes of the manufacturer and the applicant company. Criteria for social aspects of the product are required under the international standard on ecolabelling (ISO 14024), and this section is common to all GECA standards. Equivalent sections are included in standards of all other GEN member ecolabelling bodies around the world. The social aspect partially addresses the third dimension of sustainability - Society. This was first understood by manufacturers under the name Corporate Social Responsibility (CSR). In this standard social criteria include laws for equal opportunity, safety and protection of workers. GECA certification cannot be given to any company that illegally exploits workers or their families.

Note: In cases where there is a conflict between GECA requirements in this section and relevant legislation or regulations introduced by governments and agencies, national legislation overrides state legislation and state legislation overrides regulations and standards issued by GECA.

Environmental Legislation

Criterion 30: The manufacturer(s) of the product and the applicant company are required by law to comply with relevant environmental legislation and government orders at the Local, State and Commonwealth levels (if these have been issued). Where a manufacturer is from an overseas jurisdiction, it is that jurisdiction's environmental regulations that apply. Where the manufacturer has been found guilty of a breach of any environmental legislation or permit(s) within the last 2-years there must be evidence of corrective action.

Demonstration of Conformance

DoC 30.1: Signed declaration from an Executive Officer of the organisation stating compliance to environmental legislation and government orders; as well as declaration of any breaches of environmental legislation or permits and the date of the breach. Applicant must:

- provide a Legal Register listing applicable environmental legislation (including applicable Regulations under that legislation) in, or as an attachment to, this declaration. The Legal Register must, for each applicable Act and Regulation listed, state whether the manufacturer and applicant company comply; or
- have a certified ISO 14001, Eco-Management and Audit Scheme (EMAS) or equivalent environmental management system in place; and

DoC 30.2: Any relevant permits granted by the EPA or an equivalent national body; and

DoC 30.3: Evidence of corrective action following a guilty verdict, if applicable.



In this criterion, 'Regulation' means an entire regulatory instrument (for example, the Environmentally Hazardous Chemicals Regulation 2008) and not the individual sections, provisions or clauses of a regulatory instrument.\

Fair Pay

Criterion 31: All employees must be covered by a Federal or State award; a certified industrial agreement or a registered agreement as determined by the Australian Government Workplace Authority, or a State or Territory Workplace Relations Agency; or a workplace agreement in compliance with Workplace Relations Act 1996 Part 7 - The Australian Fair Pay and Conditions Standard. Where a manufacturer is from an overseas jurisdiction, it is that jurisdiction's equivalent regulations that apply.

Demonstration of Conformance

DoC 31.1: Signed declaration of compliance from an Executive Officer of the organisation;

DoC 31.2: Text or template of a typical workplace agreement offered to employees of the company; and

DoC 31.3: Sample payslips.

Workplace Safety

Criterion 32: A manufacturer / applicant company must demonstrate general compliance with State or Territory Legislation concerning Occupational and Workplace Health and Safety and / or the Commonwealth Safety, Rehabilitation and Compensation Act 1988, where applicable. Where a manufacturer is from an overseas jurisdiction, it is that jurisdiction's equivalent regulations that apply. Where a manufacturer / applicant company has been found guilty of a breach of relevant legislation within the last 2-years, there must be evidence of corrective action.

Demonstration of Conformance

DoC 32.1: Signed declaration from an Executive Officer of the organisation stating compliance to workplace legislation and government orders, as well as declaration of any breaches of legislation and the date of the breach. Applicants must list all applicable legislation in, or as an attachment to, this declaration;

DoC 32.2: Copy of the company Occupational / Workplace H&S policy and procedures;

DoC 32.3: Copy of employee induction records, training records, meeting records and risk assessments; or current OHSAS 18001, AS/NZS 4801 or equivalent certification; or third party certification stating compliance to OH&S Act 2004 and the OH&S Regulations 2007 or equivalent jurisdiction specific legislation; and

DoC 32.4: Evidence of corrective action following a guilty verdict, if applicable.

Equal Opportunity

Criterion 33: The manufacturer and / or applicant company must demonstrate general compliance with the requirements of the Racial Discrimination Act 1975, Sex Discrimination Act 1984, Disability Discrimination Act 1992, Equal Opportunity for Women in the Workplace Act 1999 and complementary State Legislation. The manufacturer cannot be in the list of 'named' or non-compliant employers under the Equal Opportunity for Women in the Workplace Act 1999. Where a manufacturer / applicant company is from an overseas jurisdiction, it is that jurisdiction's equivalent regulations that apply. Where a manufacturer has been found guilty of a breach of relevant legislation within the last 2-years, there must be evidence of corrective action.

Demonstration of Conformance

DoC 33.1: Signed declaration of compliance from an Executive Officer of the organisation;

DoC 33.2: Copy of relevant company policies and procedures;

DoC 33.3: Evidence of corrective action following a guilty verdict, if applicable; and

DoC 33.4: The auditor will verify that the company does not appear on the following list:

www.wgea.gov.au/report/compliance



Lawful Conduct

Criterion 34: The manufacturer / applicant company must not have been convicted of any breach of criminal law, any breach of the Trade Practices Act 1974 or the Corporations Act 2001, including prosecution or de-listing by the Australian Stock Exchange (ASX) or international equivalent. Where a manufacturer is from an overseas jurisdiction, it is that jurisdiction's equivalent regulations that apply. Where a manufacturer has been found guilty of a breach of relevant legislation within the last 2-years, there must be evidence of corrective action.

Demonstration of Conformance

DoC 34.1: Signed declaration from an Executive Officer of the organisation; and

DoC 34.2: Evidence of corrective action following a guilty verdict, if applicable.



EVIDENCE OF CONFORMANCE

Demonstration of Conformance (DoC)

This section lists the sources of evidence which may be considered during a conformance assessment to establish compliance with this standard. This list is provided in order to guide the applicant manufacturer through the requirements of the standard and to facilitate the preparation of an application.

The DoC requirements as specified, along with each criterion in the standard, define specific sources of evidence acceptable to GECA. Where specific standards or test methods are required, it is intended that the most recent version of the applicable standard or method are used. In cases where criteria offer several DoC requirements, it is the sole decision of the appointed auditing body to choose the appropriate option during the preliminary stage of the assessment. If none of the recommended DoC requirements stipulated for a particular criterion in the standard are applicable for a product under assessment, then the appointed CAB may choose an alternative but equivalent source of evidence. In cases where alternative sources of evidence have been accepted for the verification of the product, the CAB will inform GECA by providing a report on the details as far as appropriate. GECA will use this information to continuously improve the DoC requirements stipulated by each standard.

The DoC requirements are summarised in Appendix A to assist applicants in preparing documentation for the verification process with a GECA accredited CAB.



APPENDIX A APPLICATION CHECKLIST

The Application Checklist is intended to guide the applicant company through the application and verification process. The company may collect all information that is required for the verification of the product and attach the relevant documents to their application. The table below summarises the DoC requirements for each criterion in the standard.

| Criterion Number | Criterion Content | Demonstration of Conformance See standard body for details | Evidence Attached | Complies Y/ N or NA |
|--|--|---|--------------------------|---------------------|
| Category Scope | | | | |
| Criterion 1 | Range of products | Description of the product(s) or product range; and a list including the type of fibre/raw material used, the location of pulp and paper mills, the location of manufacturing/assembly sites | <input type="checkbox"/> | |
| Fitness For Purpose – Applicable Standards and demonstrated performance | | | | |
| Criterion 2 | Applicable standards and demonstrated performance | Documentation identifying applicable standards or performance requirements, and test reports and other relevant documentation to demonstrate that standards and requirements are met and maintained | <input type="checkbox"/> | |
| Product Safety | | | | |
| Criterion 3 | Restriction on certain chemicals for products from recycled fibres. | Test reports (methods listed in standard) showing that the limits are met. | <input type="checkbox"/> | |
| Criterion 4 | Restriction for tissue products. | Test reports (methods listed in standard showing that the limits are met. | <input type="checkbox"/> | |
| Fibre Raw Materials | | | | |
| Criterion 5 | Sustainable Sourcing of fibre raw materials. | Signed declaration of compliance, supported by documentation that demonstrates the proportion of fibre types included and geographic origin (country/state and region/province) of the wood and fibre raw material that is used in each product plus: | <input type="checkbox"/> | |
| | For Virgin Wood Fibre: Relevant certificates or other evidence on forest management certification and chain of custody (to confirm the virgin fibre that is used is from a certified sustainably managed source); and relevant certificates or other evidence to confirm that the wood originates from legal sources; | | <input type="checkbox"/> | |
| | For Recycled fibre and newspaper products: Documentation that demonstrates whether the fibre is pre or post-consumer; includes any relevant certificates (e.g. FSC Recycled); | | <input type="checkbox"/> | |
| | For Waste Fibre: Documentation that demonstrates the waste source of the fibre (including relevant information and documentation); source of all waste fibre together with evidence of certification (sustainable forest management) if wood waste originates from native forests | | <input type="checkbox"/> | |



| Criterion Number | Criterion Content | Demonstration of Conformance See standard body for details | Evidence Attached | Complies Y/ N or NA |
|----------------------------------|---|---|--------------------------|------------------------|
| | For bamboo (if >20% overall): Nature and geographical source of all virgin bamboo fibre inputs together with for (a) Relevant forest certification scheme certificates; or for (b) evidence that fibre comes from certified organic plantations; or (c) relevant procurement procedures, and documents and certificates showing legal sources for the bamboo, and declaration that bamboo species do not appear on the CITES list; | | <input type="checkbox"/> | |
| | Other virgin fibre (non-wood, non-bamboo): Nature and geographical source of all virgin fibre inputs together with relevant certificates or other evidence that fibre comes from certified organic plantations; or certification, harvesting permits or other information to demonstrate that the fibre is legally harvested and does not come from protected areas or areas where ownership rights are in dispute; documentation that describes the procedure for the procurement of sustainable fibre raw materials. | | <input type="checkbox"/> | |
| Non-Fibrous Raw Materials | | | | |
| Criterion 6 | Starch products must not be derived from genetically modified material. | Signed declaration from the producer/supplier of the starch product | <input type="checkbox"/> | |
| Banned Substances | | | | |
| Criterion 7 | No use of substances acutely toxic, carcinogenic, mutagenic or toxic for reproduction, hazardous to the environment, or respiratory or skin sensitisers (see Table 1) | Signed declaration of conformance supported by documentation identifying hazardous substances used in materials and production processes or demonstrating by providing data that no substances with classifications listed in table 1 are used. | <input type="checkbox"/> | |
| Criterion 8 | No use of alkylphenol ethoxylates (APEOs) | Signed declaration of conformance from the relevant supplier(s) supported by relevant documentation (e.g. ingredients list, SDS). | <input type="checkbox"/> | |
| Criterion 9 | No use of elemental chlorine. | Signed declaration of conformance from the pulp producer. It is accepted that recycled fibres may have been bleached with chlorine gas in their previous life cycle. | <input type="checkbox"/> | |
| Criterion 10 | Restrictions on complexing agents EDTA and DTPA. | Signed declaration from the pulp/paper producer and/or relevant supplier(s) that EDTA/DTPA are not used; or | <input type="checkbox"/> | |



| Criterion Number | Criterion Content | Demonstration of Conformance See standard body for details | Evidence Attached | Complies Y/ N or NA |
|---|--|---|--------------------------|------------------------|
| | | Documentation stating the use/quantities and, if applicable, emissions of DTPA/EDTA from pulp production, measurement result, method of analysis, frequency of measurement, laboratory name and laboratory compliance. | <input type="checkbox"/> | |
| Dyes, Inks, Pigments, Coatings, Foils, Laminates | | | | |
| Criterion 11 | No phthalates (classified with H360 or H362), no mercury, lead, copper, chromium, nickel, aluminium or cadmium as constituent parts of dyes, pigments or coatings. | Declaration of Conformance from the supplier(s) supported by documentation that identifies the dyes, pigments and coatings used; and Relevant SDSs and other information demonstrating the level of impurities, if applicable. | <input type="checkbox"/> | |
| Criterion 12 | No Acrylamide monomer in coatings. | Relevant SDSs, demonstrating that no acrylamide monomer is used. | <input type="checkbox"/> | |
| Criterion 13 | No Azodyes or pigments that may release restricted amines. | Documentation that identifies the azo dyes or pigments used | <input type="checkbox"/> | |
| Biocides | | | | |
| Criterion 14 | No bioaccumulative biocides. | List all biocides used during the different production stages together with test reports for bioaccumulability of biocides or biostatic agents and/or safety data sheets with sufficient data and references to test methods. | <input type="checkbox"/> | |
| Surfactants, Washing and Cleaning Agents and Foam Inhibitors | | | | |
| Criterion 15 | No APEOs, Phthalates (classified with H360, H361) in cleaning chemicals, and no halogenated solvents. | Declaration of Conformance from the supplier(s) supported by SDS and/or other documentation that identifies the preparation(s) used. | <input type="checkbox"/> | |
| Criterion 16 | Deinking surfactants must be readily biodegradable. | List all surfactants used together with relevant test reports showing that the surfactant is readily biodegradable. | <input type="checkbox"/> | |
| Criterion 17 | Biodegradability of foam inhibiting substances. | List all substances with foam inhibiting or foam retarding effects together with SDSs and relevant test reports showing that the surfactant is readily or ultimately biodegradable, or, if applicable, evidence demonstrating that the foam inhibitors/defoamers are destroyed in chemical recycling. | <input type="checkbox"/> | |
| Wet Strength Agents | | | | |



| Criterion Number | Criterion Content | Demonstration of Conformance See standard body for details | Evidence Attached | Complies Y/ N or NA |
|--|---|---|--------------------------|------------------------|
| Criterion 18 | Restrictions on certain wet strength agents. | SDS of the wet-strength agent and other relevant information that can be used to calculate the percentage of the chloro-organic substances (mentioned in Criterion). | | |
| Other Chemical Additives | | | | |
| Criterion 19 | Other chemical additives required to meet criteria of relevant GECA standard or equivalent. | List of additives used identifying applicable criteria of the PCPv4.1-2013 standard together with the DoC required for the relevant criteria. | | |
| Air and Water Emissions – COD, NOx, P and S | | | | |
| Criterion 20 | Limits on air and water emissions using point system and reference values. | Signed declaration of compliance, supported by documentation that includes: | <input type="checkbox"/> | |
| | | Detailed calculations showing compliance to this criterion | <input type="checkbox"/> | |
| | | Relevant documentation and test reports using the following test methods: COD: ISO 6060; NOx: ISO 11564; S(oxid.): EPA no.8; S(red.): EPA no 16A; S content in oil: ISO 8754; S content in coal: ISO 351; P: EN ISO 6878. | <input type="checkbox"/> | |
| AOX Emissions | | | | |
| Criterion 21 | Limit on AOX emissions. | Test reports using the following test method: AOX ISO 9562 accompanied by detailed calculations showing compliance with this criterion, together with related supporting documentation. | <input type="checkbox"/> | |
| Greenhouse Gas Emissions (from heating and production of electricity) | | | | |
| Criterion 22 | Limit on CO ₂ emissions from pulp and paper manufacturing. | Signed declaration of compliance, supported by documentation that includes: | <input type="checkbox"/> | |
| | | Detailed calculations showing compliance to this criterion. CO ₂ from surplus energy that is sold off in the form of electricity, steam or heat, is subtracted from total emissions. | <input type="checkbox"/> | |
| | | Data on the air emissions of carbon dioxide. This shall include all sources of non-renewable fuels during the production of pulp and board, including the emissions from the production of electricity (whether on-site or off-site). | <input type="checkbox"/> | |
| Greenhouse Gas Emissions (from transportation) | | | | |
| Criterion 23 | Reporting on emissions from transportation. | Documentation showing that the paper manufacturer is already reporting on Greenhouse Gas emissions from transportation; or | <input type="checkbox"/> | |



| Criterion Number | Criterion Content | Demonstration of Conformance See standard body for details | Evidence Attached | Complies Y/ N or NA |
|--|--|--|--------------------------|------------------------|
| | | Calculation of annual carbon dioxide emissions given in kg CO2/tonne paper grade or kg CO2/tonne of the mill's total annual production. Details of how the CO2 values are calculated with reference to any assumption, the use of databases and suchlike. | <input type="checkbox"/> | |
| Energy Management | | | | |
| Criterion 24 | Reporting on energy use and initiative to reduce energy use. | Signed declaration by the Chief Executive Officer or other authorised representative of the applicant company/licence holder accompanied by documentation that describes the energy management policies, procedures and programmes; and includes reports on energy use and management. | <input type="checkbox"/> | |
| Water Usage | | | | |
| Criterion 25 | Water management policies and procedures. | Declaration of conformance signed by the Chief Executive Officer or other authorised representative of the applicant company/licence holder accompanied by documentation that describes the water management policies, procedures and programmes; and includes reports on water use and water use reduction initiatives. | <input type="checkbox"/> | |
| Waste Management | | | | |
| Criterion 26 | Procedures around waste handling. | Detailed description of the procedures adopted for the waste management of each of the sites concerned and a declaration of compliance with the criterion. | <input type="checkbox"/> | |
| Environmental Management System | | | | |
| Criterion 27 | EMS required to be in place. | Documentation showing that an EMS in in place at the relevant manufacturing sites. | <input type="checkbox"/> | |
| Packaging | | | | |
| Criterion 28 | Requirements on plastic and paper packaging. | Details of materials used as packaging, including information on the input of recycled and virgin materials reported by weight if applicable. The recycled content can be averaged over a 12 month period to find the amount or range of recycled content; and / or | <input type="checkbox"/> | |
| | | Evidence of recyclability or copy of PREP Assessment Report; and/or | | |
| | | Evidence of certification under relevant forest certification scheme; and/or | | |
| | | Details of re-use programs for transport materials within the applicant company. | | |
| Environmental Claims | | | | |



| Criterion Number | Criterion Content | Demonstration of Conformance See standard body for details | Evidence Attached | Complies Y/ N or NA |
|----------------------------------|--|---|--------------------------|------------------------|
| Criterion 29 | Public claims made by applicant | Statement of conformance signed by EO, with report showing compliance to ISO 14021. | <input type="checkbox"/> | |
| Environmental Legislation | | | | |
| Criterion 30 | Applicable environmental legislation and government orders | Statement of conformance signed by EO, with declaration of breaches and applicable legislation and Legal Register listing applicable environmental legislation or certified environmental management system in place. | <input type="checkbox"/> | |
| | | Applicable permits granted by EPA. | <input type="checkbox"/> | |
| | | Evidence of corrective action (if applicable). | <input type="checkbox"/> | |
| Fair Pay | | | | |
| Criterion 31 | Coverage of employees under certified agreements | Statement of conformance signed by EO. | <input type="checkbox"/> | |
| | | Sample workplace agreement. | <input type="checkbox"/> | |
| | | Sample payslips. | <input type="checkbox"/> | |
| Workplace Safety | | | | |
| Criterion 32 | Compliance with state or territory legislation | Statement of conformance signed by EO, with declaration of breaches and applicable legislation. | <input type="checkbox"/> | |
| | | Copy of Occupational and Workplace H&S policies and procedures. | <input type="checkbox"/> | |
| | | Copy of employee induction, training, and meeting record and risk assessments; or current OHSAS 18001, AS/NZS 4801 or equivalent certification; or other third party certification. | <input type="checkbox"/> | |
| | | Evidence of corrective action (if applicable). | <input type="checkbox"/> | |
| Equal Opportunity | | | | |
| Criterion 33 | Compliance with Racial Discrimination Act, Sex Discrimination Act, Disability Discrimination Act, Equal Opportunity for Women in the | Statement of conformance signed by EO. | <input type="checkbox"/> | |
| | | Copy of relevant policies and procedures. | <input type="checkbox"/> | |
| | | Evidence of corrective action (if applicable). | | |

Good Environmental Choice Australia Standard



| Criterion Number | Criterion Content | Demonstration of Conformance See standard body for details | Evidence Attached | Complies Y/ N or NA |
|-----------------------|--|---|--------------------------|------------------------|
| | Workplace Act and complementary State Legislation and Regulations. | Does not appear on list of non-compliant organisations. | <input type="checkbox"/> | |
| Lawful Conduct | | | | |
| Criterion 34 | No breaches of Trade Practices Act or Corporations Act. | Statement of conformance signed by EO. | <input type="checkbox"/> | |
| | | Evidence of corrective action (if applicable). | <input type="checkbox"/> | |



APPENDIX B LIST OF DYES THAT MAY CLEAVE TO RESTRICTED AMINES

| Disperse dyes that may cleave to aromatic amines | | |
|---|---------------------|---------------------|
| Disperse Orange 60 | Disperse Orange 7 | Disperse Orange 149 |
| Disperse Yellow 23 | Disperse Yellow 56 | Disperse Red 151 |
| Disperse Red 221 | Disperse Yellow 218 | |
| Basic dyes that may cleave to aromatic amines | | |
| Basic Brown 4 | Basic Red 114 | Basic Red 42 |
| Basic Yellow 82 | Basic Red 76 | Basic Yellow 103 |
| Basic Red 111 | | |
| Acid dyes that may cleave to aromatic amines | | |
| CI Acid Black 29 | CI Acid Red 24 | CI Acid Red 128 |
| CI Acid Black 94 | CI Acid Red 26 | CI Acid Red 115 |
| CI Acid Black 131 | CI Acid Red 26:1 | CI Acid Red 128 |
| CI Acid Black 132 | CI Acid Red 26:2 | CI Acid Red 135 |
| CI Acid Black 209 | CI Acid Red 35 | CI Acid Red 148 |
| CI Acid Black 232 | CI Acid Red 48 | CI Acid Red 150 |
| CI Acid Brown 415 | CI Acid Red 73 | CI Acid Red 158 |
| CI Acid Orange 17 | CI Acid Red 85 | CI Acid Red 167 |
| CI Acid Orange 24 | CI Acid Red 104 | CI Acid Red 170 |
| CI Acid Orange 45 | CI Acid Red 114 | CI Acid Red 264 |
| CI Acid Red 4 | CI Acid Red 115 | CI Acid Red 265 |
| CI Acid Red 5 | CI Acid Red 116 | CI Acid Red 420 |
| CI Acid Red 8 | CI Acid Red 119:1 | CI Acid Violet 12 |
| Direct dyes that may cleave to aromatic amines | | |
| Direct Black 4 | Direct Brown 4 | Direct Red 13 |
| Direct Black 29 | Direct Brown 6 | Direct Red 17 |
| Direct Black 38 | Direct Brown 25 | Direct Red 21 |
| Direct Black 154 | Direct Brown 27 | Direct Red 24 |
| Direct Blue 1 | Direct Brown 31 | Direct Red 26 |
| Direct Blue 2 | Direct Brown 33 | Direct Red 22 |
| Direct Blue 3 | Direct Brown 51 | Direct Red 28 |
| Direct Blue 6 | Direct Brown 59 | Direct Red 37 |
| Direct Blue 8 | Direct Brown 74 | Direct Red 39 |
| Direct Blue 9 | Direct Brown 79 | Direct Red 44 |
| Direct Blue 10 | Direct Brown 95 | Direct Red 46 |
| Direct Blue 14 | Direct Brown 101 | Direct Red 62 |
| Direct Blue 15 | Direct Brown 154 | Direct Red 67 |
| Direct Blue 21 | Direct Brown 222 | Direct Red 72 |
| Direct Blue 22 | Direct Brown 223 | Direct Red 126 |
| Direct Blue 25 | Direct Green 1 | Direct Red 168 |
| Direct Blue 35 | Direct Green 6 | Direct Red 216 |
| Direct Blue 76 | Direct Green 8 | Direct Red 264 |
| Direct Blue 116 | Direct Green 8.1 | Direct Violet 1 |
| Direct Blue 151 | Direct Green 85 | Direct Violet 4 |
| Direct Blue 160 | Direct Orange 1 | Direct Violet 12 |
| Direct Blue 173 | Direct Orange 6 | Direct Violet 13 |
| Direct Blue 192 | Direct Orange 7 | Direct Violet 14 |
| Direct Blue 201 | Direct Orange 8 | Direct Violet 21 |
| Direct Blue 215 | Direct Orange 10 | Direct Violet 22 |
| Direct Blue 295 | Direct Orange 108 | Direct Yellow 1 |
| Direct Blue 306 | Direct Red 1 | Direct Yellow 24 |
| Direct Brown 1 | Direct Red 2 | Direct Yellow 48 |
| Direct Brown 1:2 | Direct Red 7 | |
| Direct Brown 2 | Direct Red 10 | |