

Introduction

ABECEL, the Brazilian Pulp Exporters' Association, has a considerable interest in the European Union Eco-Label Scheme for paper products, in view of the fact that a substantial amount of Brazilian pulp and paper exports go to European Union countries. Indeed, we have supported, in principle, the Commission's proposal for the introduction of an Eco-label as a uniform indicator of environmental and consumer standards. To be an success, however, an eco-labelling scheme must be open, clear and transparent, and based on sound, technical and scientific information.

In essence, ABECEL believes that criteria should not be developed simply to reflect the patterns of European production and concepts, and so just reward environmental efforts in Europe. The aim of an eco-labelling scheme should be to award an eco-label to products with a reduced environmental impact. It should not be used merely to resolve the perceived problem of excess waste within Europe. To this end, sufficient regard must also be paid to the fact that in Brazil, differing priorities might result in different definitions of positive environmental results, and that solutions that are appropriate in Europe, may not be so for other regions.

Renewable Resources

The draft criteria for fine paper products does not envisage including "Renewable resources" in the points system. The Commission state that there is a need to introduce "virgin fibres at some point in the circulation of paper products." ABECEL agree that renewable resources should not be included in the point system. A high degree of virgin fibres in eco-labelled products should be possible. Indeed, load points should not, in any event, be imposed on wood if that wood is produced from sustainably managed plantation forests.

Waste Parameter

The way in which waste generation and waste paper is calculated and load points are attributed, will favour recycled fibres, at the expense of virgin fibres. The proposed levels and allocation of points will therefore penalise factories which are unable to choose their operating conditions but are using wood that originates where forest management is applied.

Although the weight factor of waste parameter has been reduced from 1.0 to 0.6, ABCECEL contend that the concessions do not go far enough. ABCECEL suggest that the waste parameter should be further reduced to 0.3.

ABCECEL have a number of objections to the proposed treatment of waste:

- The use of new fibre in this product group is indispensable in order to ensure sufficient quality. It should be recognised that certain paper fibres (such as those that have been recycled repeatedly) cannot be recycled into new paper products.
- The EU proposals fail to encourage recycling mills to minimize solid waste discharge, in that a mill using recovered paper is entitled to deduct the quantity of recovered paper used from the quantity of sludge discharge.

However, mills that neglect to use modern techniques and discharge sludge far in excess of the practical minimum would have no incentive to improve their performance. **The calculation procedure for solid waste discharge should be modified so that mills cannot simply deduct recycled fibre used from the waste discharged, regardless of the amount of amount of waste.**

- It should be recognised that the waste generated in manufacturing industries has different hazardous and toxicity ratings. ABCECEL suggest that wastes should be considered on the dry basis and related to the Total Equivalent Waste, by weighting differences in toxicity and hazardousness.
- A more balanced approach could be to realise the coexistence of recycled and new fibre in a given product. If the Commission insist that a mill using recovered paper is entitled to deduct the quantity of recovered paper used from the quantity of sludge discharge, then the amount of waste that is recovered and used as a fuel should be considered as a credit for the natural or virgin paper. Hence, solid residues such as a mud, rich in calcium should also receive a credit.

SO₂

This factor assumes that all producers contribute to the acid rain issue. However, it is a minor problem in many areas. Producers located in regions not facing this problem should not receive penalties for it.

SO₂ is only relevant in densely populated, industrialized countries, such as those in the European Union. It is not significant in areas where few sources are available and the concentration in air is low. In this case, the small liberation of sulphur in the air is even beneficial, since sulphur is a nutrient to the surrounding plants.

Conclusion

ABECEL believes that these are several important points to be discussed at this stage, before the criteria for fine paper products are passed to the Regulatory Committee for consideration. We welcome the opportunity to discuss these issues, via the Consultation Forum, but remain conscious of the need to ensure that the eco-label is not abused as a protectionist barrier to imports from non-Community countries.