

September 17th, 2010

Re: Nordic Swan's Weakening of AOX standards

Dear Sir or Madam,

We are deeply concerned about the Nordic Swan's proposal for new emissions allowance for AOX, signalling Nordic Swan's retreat on this issue in face of industry pressure. This proposal takes Nordic Swan another step away from being a reliable consumer tool to determine sustainability of paper products and threatens to put the label in the category of 'greenwash.' Our intent in this letter is to comment on AOX emissions allowances under the label and we do not address other issues herein.

Dioxin causes cancer in humans and there is no safe level of emissions for these compounds. Therefore, long-term target emissions of AOX should be zero, which is ultimately achievable only by TCF. In the medium term, however, Nordic Swan must drive best and better practices in the paper industry. Endorsing any level of AOX emissions below that achieved by current Best Available Technology for ECF mills is unacceptable. More appropriate AOX emission standards are discussed in this letter at greater length below.

The Stockholm Convention on Persistent Organic Pollutants (POP's) aims to 'reduce the total release of the byproducts dioxin and furans from man made sources with the goal of continuing minimization and where feasible, their ultimate elimination'. These POP's such as dioxins, furans and other chlorinated compounds are being outlawed because they pose unacceptable risks to human and ecosystem health. Elemental Chlorine Free (ECF) technology continues to produce and release some of these POP's described as AOX – albeit the best technologies can achieve AOX levels of 0.04kg/ADT.

The pulp and paper industry remains reluctant to invest the capital (as well as technical expertise) required to operate TCF or best practice ECF mills. There is no doubt it is simpler for manufacturers to apply chlorine and related toxic products to achieve their required standards of bleaching.

However, as Swedish pulp and paper producer SCA have stated, 'At Ortviken we produce LWC (light weight coated, for magazines and other high end uses) paper which requires bleached sulphate pulp as reinforcement. We use less reinforcement than our competitors despite the fact that we use TCF pulp from Östrand as reinforcement pulp. Our TCF pulp does not have lower quality than ECF pulp .

It is the European Environmental Paper Network's position that despite the misconceptions propagated by several industry groups, the most environmentally benign, high quality pulp and paper today is produced by Total Chlorine Free (TCF) and (in the second instance) best practice Elemental Chlorine Free (ECF) technologies. While industry groups favour industry funded studies attempting to suggest that environmental differences between ECF and TCF are negligible, various peer reviewed analyses clearly outline the environmental advantages of TCF technology over ECF.

In particular industry groups have relied upon a comparative analysis of effluent at the Rosenthal mill in Germany which purportedly demonstrated that effluent from ECF and TCF mills were comparable. However, the frequently cited study by Gottsching and Hamm is misleading as the Rosenthal ECF mill is clearly an environmentally best practice ECF mill with AOX effluent at 0.04kg/ADT and therefore not representative of the average ECF technology in use today. On top of that this report's validity is questionable as it was funded by the German pulp and paper industry. Hence, even if the toxicity of the effluents at Rosenthal proved to be similar – and this case has not been rigorously made – the fact of the comparatively low AOX component from this particular ECF mill is not representative of ECF more generally.

It is our understanding that Nordic Swan must achieve two things: provide consumers with certainty that their purchases abide by the strictest environmental criteria; and drive a process of continual improvement across industry sectors.

As required by the Stockholm Convention on POPs and the precautionary principle outlined within it, the eventual phase-out of the release of dioxins and other chlorinated compounds must be one of the pulp and paper industry's primary environmental goals. This means that Nordic Swan must require continual improvement from the current high AOX 0.25kg/ADT acceptable limit to at least below the current industry average of 0.15kg/ADT. Finally, to be awarded the Nordic Swan label, pulp and paper manufacturers should have to demonstrate continual progress toward the obviously achievable 0.04kg/ADT, as shown at the Rosenthal mill and documented in the study highlighted above. The ultimate objective must be to achieve TCF pulp and paper standards.

We would wish to avoid any kind of public disagreement with Nordic Swan over this issue and we remain open to dialogue as we believe the merits of our case are compelling for Nordic Swan. Therefore, Nordic Swan must immediately withdraw its previous decision to weaken the AOX limit on tissue paper. This previous ruling was made on the basis of information and market analysis that is obsolete. To reward producers of ECF pulp with AOX limits in the 0.15-0.2kg/ADT range is to reward the status quo in environmental performance and fails to differentiate the poor performers from the best, making the Nordic Swan label meaningless. It will also fail to drive any kind of performance improvement in the industry, which is a central objective of the Nordic Swan label.

We therefore wish to voice our concern, once again, over the proposed relaxation of Nordic Swan's AOX standards. This would be an unacceptable move and would meet our determined disapproval.

Yours Sincerely,

Daniel Hausknost, Coordinator, *European Environmental Paper Network (EEPN)*

For the EEPN Steering Committee:

Jim Ford, *Climate for Ideas, UK*

Harri Karjalainen, *WWF International*

Otto Miettinen, *Finnish Nature League, Finland*

Monika Nolle, *ARA, Germany*

Sergio Baffoni, *Terra, Italy*

Peter Gerhardt, *Robin Wood, Germany*

Sini Eräjää, *Finnish Association of Nature Conservation*

- The European Environmental Paper Network is a civil society movement promoting sustainable practices in the pulp and paper industry. It consists of more than 50 non-governmental organisations from 21 countries.**