

## Practical guide for the use of the EU Ecolabel in the green public procurement of absorbent hygiene products



### HIGHLIGHTS

- The [EU Ecolabel](#) and [EU GPP](#) are two European policy instruments that can be used by public procurers in a synergistic manner by matching supply and demand signals to green the market.
- Suppliers receive general demand signals for greener products. However public procurers are often reluctant to state specific green criteria in calls for competition because of uncertainty about what exactly to ask for and the availability of compliant products on the market.
- These practical guidelines help procurers to draw up technical specifications and award criteria in calls for the green public procurement of absorbent hygiene products.
- Compliance with the recommended EU GPP criteria can be verified simply by products carrying the EU Ecolabel and, in some cases, by products carrying other ISO 14024 type I eco-labels.

QUICK GUIDE - Recommended environmental criteria focus on: (i) fluff pulp, man-made cellulose fibre, and cotton sourcing and processing (ii) material efficiency in the manufacturing of the final product, and (iii) product packaging.

For more detailed information about the rationale behind these criteria, please consult related JRC reports ([Background report to the guide for the use of the EU Ecolabel criteria in the green public procurement of absorbent hygiene products](#) [1], [Preliminary Report](#) [2], [Final Technical Report](#) [3]).

*'The common goal of the EU GPP and EU Ecolabel policies is to promote products (goods and services) with a reduced environmental impact throughout their life cycle'*

## INTRODUCTION

### Background to EU GPP

Green Public Procurement (GPP) is defined in the European Commission's Communication "[Public procurement for a better environment](#)" as "a process whereby public authorities seek to procure goods, services and works with a reduced environmental impact throughout their life cycle when compared to goods, services and works with the same primary function that would otherwise be procured." Training toolkits<sup>1</sup> for public authorities are available to help understand the strategic thinking, legal aspects, needs assessment and how to engage with the market.

### Scale of PP in the EU

Every year, over 250 000 public authorities in the EU spend around 14% of EU Gross Domestic Product (GDP) on the purchase of services, works and supplies<sup>2</sup>, accounting for roughly EUR 1.8 trillion annually<sup>3</sup>. The public sector can use procurement to boost jobs, growth and investment, and to create an economy that is more innovative, more energy efficient and [more circular](#).

### The use of labels in PP

According to the EU Public Procurement Directives (2014/24/EU and 2014/25/EU) labels (e.g. ecolabels) can be used at different stages of the procurement process (e.g. preparation of documents, market engagement, evaluation of bids, and assessment of contract compliance for the winning bid). At the bid evaluation and at the contract compliance assessment stages, ecolabels provide a means of third-party verification, which can considerably help administration to save time and effort while ensuring the applicability of high environmental standards in public contracts.

In general, labels can be required as means of proof in bidding exercises as long as the following conditions are fulfilled (taken from Article 43 of Directive 2014/24/EU and Article 61 of Directive 2014/25/EU with some additional text added in square brackets [] for clarity):

- a) the label requirements [set in GPP criteria] only concern [proof of compliance with] criteria which are linked to the subject matter of the contract and are appropriate to define characteristics of the supplies or services that are the subject matter of the contract;
- b) the label requirements are based on objectively verifiable and non-discriminatory criteria;
- c) the labels are established in an open and transparent procedure in which all relevant stakeholders, including government bodies, consumers, social partners, manufacturers, distributors and non-governmental organisations, may participate;
- d) the labels are accessible to all interested parties [i.e. manufacturers or service providers can apply for the label and contracting authorities can access the underlying label criteria];
- e) the label requirements are set by a third party over which the economic operator applying for the label cannot exercise a decisive influence.

### The synergies between EU Ecolabel and EU GPP

In a similar manner to EU GPP, the aim of the EU Eco-label, as defined in Regulation (EC) No 66/2010 (EC, 2010) is to "promote products with a reduced environmental impact during their entire life cycle" via a voluntary ISO 14024 type I ecolabel award scheme. For any given product group, whenever procurers decide to set requirements based on EU Ecolabel criteria, the supply side EU Ecolabel policy is working in tandem with the demand side EU GPP policy to drive the market towards better products in terms of environmental performance.

This practical guide presents several EU Ecolabel criteria that are considered especially relevant for their use in green public procurement of absorbent hygiene products, with the aim of generating the synergies illustrated below (see Figure 1).

### Types of procurement criteria

There are several different types of procurement criteria, with the most relevant to green requirements being:

<sup>1</sup> See: [https://ec.europa.eu/environment/gpp/toolkit\\_en.htm](https://ec.europa.eu/environment/gpp/toolkit_en.htm)

<sup>2</sup> See: [https://ec.europa.eu/info/policies/public-procurement\\_en](https://ec.europa.eu/info/policies/public-procurement_en)

<sup>3</sup> See: [https://ec.europa.eu/environment/gpp/buying\\_handbook\\_en.htm](https://ec.europa.eu/environment/gpp/buying_handbook_en.htm)

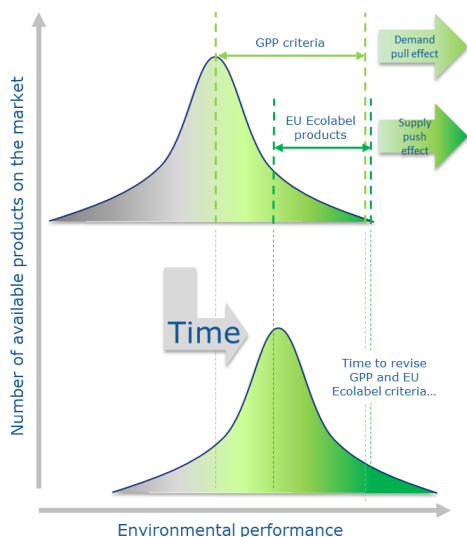
(i) Technical Specifications (TSs), which are mandatory requirements that ALL relevant products covered by a call for competition must meet.

(ii) Award Criteria (ACs), which can be used as additional optional requirements that would make compliant products more competitive, depending on the weighting applied to the award criteria. In many cases, good environmental performance is stipulated as an award criterion.

(iii) Contract Performance Conditions (CPCs), which are mandatory rules for how a contract must be carried out. They shall not have any influence on the awarding of the contract and no means of proof can be requested during the tendering phase, but failure to comply with them is linked to clear penalties and other consequences, such as the cancellation of the contract.

To make green criteria better known, it is up to procurers to specify them in calls for tender and explain more about them to potential bidders through market engagement exercises before calls for tender are published. For more information on market engagement, please see module 6 of the EU GPP training toolkit<sup>4</sup>.

Figure 1 – Intended synergistic effect of voluntary EU Ecolabel & EU GPP policies on the “greening” of a market



Source: JRC own elaboration.

## SCOPE AND DEFINITION

The products included under these recommended EU GPP criteria fall within the scope of EU Ecolabel

<sup>4</sup> See the GPP Training toolkits here: [https://ec.europa.eu/environment/gpp/toolkit\\_en.htm](https://ec.europa.eu/environment/gpp/toolkit_en.htm)

<sup>5</sup> See: Commission Decision (EU) 2023/1809 of 14 September 2023 establishing the

criteria for absorbent hygiene products (Article 1 of [Commission Decision \(EU\) 2023/1809](#)<sup>5</sup>), as presented in Table 1.

Table 1 – Products included under these recommended EU GPP criteria

<p style="text-align: center;"><b>INCLUDED</b></p> <p><i>Any article for both private and professional use whose function is to absorb and retain human fluids such as urine, faeces, sweat, menstrual fluid or milk.</i></p>	<ul style="list-style-type: none"> <li>✓ Diapers/nappies;</li> <li>✓ Incontinence care products, excluding medical devices;</li> <li>✓ Sanitary pads/towels;</li> <li>✓ Panty liners;</li> <li>✓ Tampons;</li> <li>✓ Nursing pads (breast pads).</li> </ul>
<p style="text-align: center;"><b>EXCLUDED</b></p> <ol style="list-style-type: none"> <li>1. Products falling under the scope of <a href="#">Regulation (EU) 2017/745</a>;</li> <li>2. Textile products.</li> </ol>	

Source: JRC own elaboration.

## Common Procurement Vocabulary (CPV) codes

When procurers publish a call for competition, a CPV code should be used when describing the subject matter of the call. Consequently, it is worthwhile to check how products included in the scope of EU Ecolabel criteria sit within the hierarchy of CPV codes set out in [Regulation \(EC\) No 213/2008](#). Table 2 displays the CVP codes that were found to be the most relevant to the product group's scope.

The absorbent hygiene products (hereafter, AHPs) belong to Division 33 (CVP 33000000-0) *Medical equipment, pharmaceuticals and personal care products*, sub-divisions of *personal care products*, further segmented into *baby care products* and *paper sanitary*. The Division 33 does not acknowledge a specific sub-category for incontinence products.

A home delivery service of incontinence products pertains to Division 85: *Health and social work services*, sub-division CVP 85142000-6 *Paramedical*

EU Ecolabel criteria for absorbent hygiene products and for absorbent hygiene products (OJ L 234, 22.9.2023, p. 142).

services, further segmented into CVP 85142400-0 *Home delivery of incontinence products*.

Table 2 – Relevant CPV codes that could involve EU Eco-label for absorbent hygiene products

Division 33: CVP 33000000-0 Medical equipment, pharmaceuticals and personal care products	
CVP 33700000-7 Personal care products	CVP 33750000-2 <a href="#">Baby care products</a> CVP 33751000-9 Disposable nappies CVP 33752000-6 Nursing pads
	CVP 33770000-8 <a href="#">Paper sanitary</a> CVP 33771000-5 <a href="#">Sanitary paper products</a> CVP 33771100-6 Sanitary towels or tampons CVP 33771200-7 Paper napkin liners
Division 85: CVP 85000000-9 Health and social work services	
CVP 85100000-0 Health services	CVP 85142000-6 <a href="#">Paramedical services</a> CVP 85142400-0 Home delivery of incontinence products

Source: JRC own elaboration.

## Potential and real-life procurement examples

The procurer might use real-life good practice examples as an aid to identify the elements of the tendering process that raise the demand for “green” products and help shift the market towards more sustainable products.

Consistent implementation of such measures will encourage the 'doers and makers' to endorse green purchasing and implement procedures capable of advancing sustainable procurement practices. Embedding green purchase into procedures or criteria encourages innovation, supply chain traceability and resources management while shaping a sustainable transformation at the production and consumption level. More practical information about the best practice in Green Public Procurement can be found on [DG Environment website](#)<sup>6</sup> or in dedicated brochure<sup>7</sup>.

The AHPs procurement is likely to mainly satisfy the needs of health care providers or alike public administration bodies including public home-care service. Besides, AHPs will also be purchased by penitentiary institutions, kindergartens, schools, women’s care facilities, and or any other public establishment, which might require the provision of the menstrual products – for example - dispensers’ machines in universities. The distribution of free of charge AHPs might also form part of a dedicated governmental campaign to take action against period poverty or/and to facilitate equal rights and ensure

dignity to access menstrual products, or else in case of natural disasters.

When procuring AHPs, the administration will most likely group the purchase under lots embedded into extensive framework contracts. Random check of contract notices published on the [Tenders Electronic Daily](#) platform shows that some framework contracts represented a centralised approach, for instance, centrally (or regionally) procured framework contract when the contracting authority is purchasing on behalf of other authorities or when the purchase proceeds under the joint tender between different entities such as hospitals in the same city or region. In both cases, this allows authorised (or listed in the notice) public bodies to benefit ‘on-demand’ from the Framework during the defined period of time (usually between 12 and 24 months) without additional procurement cycle(s). Based on lessons learned from the real-life examples, the centralised procurement provides goods and services at more competitive prices, as well as streamlines the administrative procedures. In case of health care sector, the governing body [*hospital public procurement administration*] will most likely collect the purchase requests from across the entities (or sub-entities). This procurement model accommodates specific needs of the receiving body avoiding a ‘one-size-fits-all’ purchase e.g., demand for diverse size of baby diapers. However, the methodological organisation will require a strategic co-operation across the entity. To bring expected results, the planning phase must be supported by a collaborative knowledge and capacity sharing across all involved departments, institute or any other, from the preliminary assessment to the execution of the contract i.e., ‘work together and combine forces’.

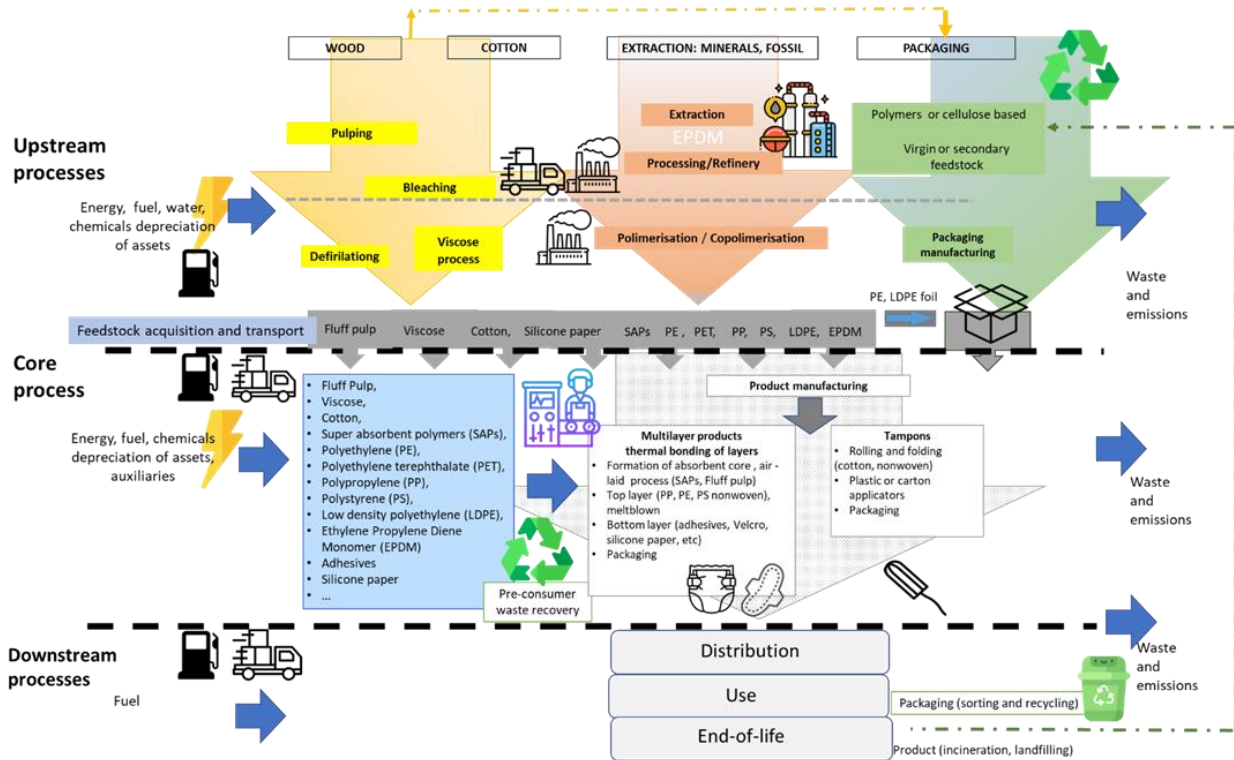
## ENVIRONMENTAL HOTSPOTS

With the exception of tampons, disposable AHPs are complex multi-layer and multi-material products where each layer serves a distinct purpose. Tampons are usually made of rayon blended with cotton fibres or exclusively cotton. The resource flow and life cycle phases involved in the production of AHPs - the upstream, core, and downstream processes - are schematically represented in Figure 2. For the manufacturing of specific materials (components of an end product), the product life cycle in Figure 2 can be read vertically, with the life cycle extending from top to bottom.

<sup>6</sup> See: [https://ec.europa.eu/environment/gpp/case\\_group\\_en.htm](https://ec.europa.eu/environment/gpp/case_group_en.htm)

<sup>7</sup> See: [https://ec.europa.eu/environment/gpp/pdf/GPP\\_Good\\_Practices\\_Brochure.pdf](https://ec.europa.eu/environment/gpp/pdf/GPP_Good_Practices_Brochure.pdf)

Figure 2 – Overview of main processes and life cycle stages for the manufacturing of absorbent hygiene products



Source: JRC own elaboration.

The upstream process involves the acquisition, production and distribution of raw materials to produce input materials (feedstock) that are then passed on (delivered) to the core process. The AHP value chain therefore begins with the sourcing and processing of raw materials (upstream processes), which make the greatest contribution to the impact on the life cycle. This is due to the extensive use of natural resources, electricity and chemicals.

The raw materials from the upstream phase are processed into absorbent hygiene products in the core process (end product manufacture). In almost all impact categories, the manufacturing phase accounts for only a small part of the environmental impact.

The downstream process includes the distribution of the product (from the production site to the retailer and then to the end consumer) as well as the utilisation phase and the end of life (EoL) of the product and packaging. The EoL is mainly caused by emissions from the landfilling of the product. Recycling the packaging can partially offset the effects of landfilling.

Reducing the overall environmental impact of AHPs should in the first place focus on addressing the

environmental hotspots, improving process efficiency and circularity of the raw materials used, while maximising waste recovery in the pre-consumer phase (both upper – and core processes), and reuse/recycling of packaging material in the EoL phase. Further enforcement of ecodesign measures, particularly in the upstream process where most environmental impacts occur, could serve as a roadmap for steering the AHPs value chain towards circular economy goals.

In this sense, the EU Ecolabel together with other relevant ISO type I ecolabels could provide a well-established and industry-verified guidance.

### PROPOSAL OF SUITABLE EU ECOLABEL-BASED REQUIREMENTS FOR EU GPP CRITERIA

Each of the EU Ecolabel requirements for absorbent hygiene products, as established by Annex I to [Commission Decision \(EU\) 2023/1809](#), has been screened against its fitness for use as EU GPP criterion in calls for competition. The five most suitable criteria areas (addressed in detail by 10 technical specifications and 9 award criteria) were identified based on their link to the subject matter of

the procurement contract, the ease of verification (*in cases where there is no EU Ecolabel*) and relevance to environmental hotspots.

The EU GPP approach to managing the key environmental impacts of AHPs might, therefore, focus on the following most relevant and suitable thematic sections:

1. Fluff pulp sourcing and manufacturing (referring to the impacts associated with upstream processes for fibre sourcing and processing);
2. Man-made cellulose fibre sourcing and manufacturing (referring to the impacts associated with upstream processes for fibre sourcing and processing);
3. Cotton and other natural cellulose seed fibre sourcing and manufacturing (referring to the impacts associated with upstream processes for fibre sourcing and processing);
4. Material efficiency in the manufacturing of the final product pulp bleaching (referring to the impacts associated with core production process);
5. Packaging (referring to the impact associated with downstream processes).

Any AHP carrying the EU Ecolabel can be automatically assumed to comply with all of the EU GPP criteria recommended in this practical guide.

Contracting authorities requiring the EU Ecolabel shall accept all labels that confirm that the works, supplies or services meet equivalent requirements.

The recognition of other labels to be used as equivalent verification means will streamline the selection procedure and will amplify the market share of suitable green products.

Table 3 summarises the equivalency check for different criteria established by environmental




schemes that might be used as a reference for the verification of EU GPP criteria recommended for AHPs. These schemes were selected due to their correlation with the EU Ecolabel criteria and their widespread use in Europe. The list of the schemes is not exhaustive.

The Forest Stewardship Council (FSC) and Programme for the Endorsement of Forest Certification (PEFCS) are exclusively forestry certificates and so they do not appear in Table 3.

In Table 3, green tick (“covered”) applies when the criteria established by selected schemes entirely cover the verification of the proposed EU GPP requirements and therefore can be directly used as proof of compliance without further verification. When the tick is orange, it means that the criteria established by selected schemes partially or potentially covered the verification of the proposed EU GPP requirements and therefore further assessment is required. Finally, an “x”, applies when the criteria established by selected schemes does not cover the verification of the proposed EU GPP requirements.

The applicability of other appropriate means of proof or compliance’s evidence always needs to be checked in relation to the requirements used in a tender.

Table 3 – Verification of proposed EU GPP criteria of absorbent hygiene products by means of EN ISO 14024 type I ecolabelling schemes (as of September 2024) (1/2)

Recommended EU GPP criteria	8	9, 10, 11	12
<b>FLUFF PULP</b>			
<b>TS 1.1. SOURCING OF FLUFF PULP</b>	✓	✓	✓
<b>TS 1.2. FLUFF PULP BLEACHING</b>	✓	✓	✓
<b>AC 1.1. Absorbable organic halogens (AOX)</b>	✓	✓	✓ <sup>1</sup>
<b>AC 1.2. Chemical oxygen demand (COD) sulphur (S), NOx, and phosphorous (P) emissions</b>	✓	✓ <sup>2</sup>	✓
<b>AC1.3. Emissions of CO<sub>2</sub> from fluff pulp production</b>	✓	✓	x
<b>AC 1.4. Energy consumption</b>	✓	✓ <sup>3</sup>	✓

<sup>8</sup> Commission Decision (EU) 2023/1809 of 14 September 2023 establishing the EU Ecolabel criteria for absorbent hygiene products and for reusable menstrual cups

<sup>9</sup> See: Nordic Ecolabel criteria for Paper Products – Basic Modules, (Version 3.0 · 05 October 2020 – 31 December 2025, available at: [https://www.nordic-eco-label.org/globalassets/ai001\\_3.0\\_basic\\_module\\_cd.pdf](https://www.nordic-eco-label.org/globalassets/ai001_3.0_basic_module_cd.pdf)

<sup>10</sup> See: Nordic Ecolabelling for Paper products – Basic module, version 2.7 · 22 June 2011 - 31 December 2025, available at: <https://www.nordic-swan-eco-label.org/4ac252/contentassets/956d503409fb4a6bb1bb38762bb78da5/basi>

[c-module-for-paper-products-2.7\\_041\\_printing-companies-and-printed-mat-ter-041\\_english.pdf](#)

<sup>11</sup> See: Nordic Ecolabelling for Sanitary Products, Version 6.9. 14 June 2016 - 31 December 2025, available at: <https://api.svanemaerket.dk/api/docs/CriteriaDocumentFiles/7444>

<sup>12</sup> See: Nappies, feminine hygiene and incontinence products (absorbent hygiene products, AHP) - DE-UZ 208, Basic award criteria, January 2021, version 3, available at: <https://www.blauer-engel.de/en/productworld/nappies-feminine-hygiene-and-in-continenence-products>

Table 3 – Verification of proposed EU GPP criteria of absorbent hygiene products by means of EN ISO 14024 type I ecolabelling schemes (as of September 2024) (2/2)

Recommended EU GPP criteria			
<b>MAN-MADE CELLULOSE FIBRE</b>			
<b>TS2.1. SOURCING OF MAN-MADE CELLULOSE FIBRES</b>	✓	✓	x
<b>TS2.2. PULP BLEACHING</b>	✓	✓	x
<b>AC 2.1.1. Absorbable organic halogens (AOX)</b>	✓	✓	x
<b>AC 2.1.2. Organically bound chlorine (OCI)</b>	✓	✓	x
<b>AC 2.2. Production of man-made cellulose fibre</b>	✓	✓	x
<b>COTTON AND OTHER NATURAL CELLULOSIC SEED FIBRES</b>			
<b>TS 3.1. SOURCING OF COTTON AND OTHER NATURAL CELLULOSIC SEED FIBRE</b>	✓	✓	✓
<b>TS3.2. Bleaching of cotton and other natural cellulosic seed fibre</b>	✓	✓	✓
<b>PRODUCTION PROCESS</b>			
<b>TS 4.1. MATERIAL EFFICIENCY IN THE MANUFACTURING OF THE FINAL PRODUCT.</b>	✓	x	x
<b>PRODUCT PACKAGING</b>			
<b>TS 5.1. CARDBOARD, AND/OR PAPER USED FOR PACKAGING</b>	✓	✓	✓
<b>AC 5.1. Plastic used for packaging</b>	✓	✓	✓
<b>TS 5.2. NON - USE OF COMPOSITE MATERIAL IN PACKAGING</b>	✓	✓	✓
<b>AC 5.2. Recyclability</b>	✓	✓	✓
<b>TS 5.3. INFORMATION ON RECYCLED CONTENT AND RECYCLABILITY ON PRODUCT PACKAGING</b>	✓	✓	✓

✓ = Covered; ✓ = partially or potentially covered/further assessment required; x = not covered

Source: JRC based on EC 2023, Nordic Ecolabelling 2016, Blue Angel 2021

- 1) If the fluff pulp is manufactured with only one type of pulp (without pulp mix), otherwise not equivalent
- 2) If the pulp is verified against with Nordic Ecolabelling for Paper Products – Basic Module (v 3.0), otherwise not equivalent
- 3) Only if the sum of points for energy and fuel does not exceed 2.5, otherwise not equivalent.

## RECOMMENDED EU GPP CRITERIA

This section provides information on the recommended EU GPP criteria that are based on EU Ecolabel criteria for AHPs.

If you are interested in learning more about technical rationales that support the selection of EU GPP criteria, refer to Background report for authorities awarding public contracts, based on EU Ecolabel criteria. The report also provides information on the verification and equivalency checks for type I Ecolabels commonly used in the EU.

The EU GPP recommendations taking the form of technical specifications (TS) and award criteria are grouped into thematic sections. Means of verification and equivalency check are combined and presented at the end of each section.

## CRITERIA AREA 1: FLUFF PULP

### TS 1.1. Sourcing of fluff pulp

All (100%) fluff pulp used in a product shall be legally sourced and covered by valid Chain of Custody (CoC) certificates issued by an independent third-party certification scheme such as the Forest Stewardship Council (FSC), the Programme for the Endorsement of Forest Certification (PEFC) or equivalent.

At least 70% of the wood raw material used for the production of fluff pulp shall be covered by valid Sustainable Forestry Management (SFM) certificate issued by an independent third-party certification scheme such as FSC, PEFC or equivalent.

The certification bodies issuing forest and/or chain of custody certificates shall be accredited or recognised by that certification scheme. If the fluff pulp does not carry a required label or an equivalent label, other equivalent means of proof must be provided.

### TS 1.2. Fluff pulp bleaching

Fluff pulp used in the absorbent hygiene product shall be elemental chlorine free (ECF) or totally chlorine free (TCF) bleached.

Chlorine gas shall not be used as a bleaching agent.

### AC 1.1. Absorbable organic halogens (AOX)

Note: This criterion refers to elemental chlorine free (ECF) pulp. Totally chlorine free (TCF) pulp automatically fulfils this requirement.

X points will be awarded when ECF pulp bleaching for each pulp used in a product demonstrated to comply with maximum AOX emission value in accordance with criterion 1.2 of Annex I to Commission Decision (EU) 2023/1809.

### AC 1.2. Chemical oxygen demand (COD) sulphur (S), NO<sub>x</sub>, and phosphorous (P) emissions

X points will be awarded when fluff pulp making process demonstrated to comply with maximum COD, S, NO<sub>x</sub>, and P emission limits to air and water in accordance with criterion 1.3 of Annex I to Commission Decision (EU) 2023/1809.

### AC 1.3. Emissions of CO2 from fluff pulp production

X Points will be awarded when fluff pulp manufacturing process demonstrated to comply with maximum CO2 emission values in accordance with criterion 1.4 of Annex I to Commission Decision (EU) 2023/1809.

### AC 1.4. Energy consumption during fluff pulp production

X points will be awarded if the energy used for the fluff pulp production demonstrated to comply with the maximum energy (electricity and fuel) consumption in accordance with criterion 1.5 of Annex I to Commission Decision (EU) 2023/1809.

#### Verification:

*Absorbent hygiene products, which have been awarded the EU Ecolabel according to Annex I of Commission Decision (EU) 2023/1809 will be deemed to comply with the requirement.*

*Alternatively, the tenderer shall declare that the absorbent hygiene product has been certified by another third-party operated labelling scheme confirming that equivalent EU Ecolabel requirements are met<sup>(1)</sup>.*

*If the absorbent hygiene product does not carry a required label or an equivalent label, another equivalent means of proof must be provided.*

*<sup>(1)</sup> For TS 1.1. equivalency means compliance check and demonstrating that fluff pulp used in manufacturing of the non-EU Ecolabel absorbent hygiene product meets or exceeds the requirements as stated in criterion 1.1 of Annex I to Commission Decision (EU) 2023/1809.*

*At the time of writing (as of September 2024), suitably equivalent third-party operated schemes identified include: FSC, PEFC, and Blue Angel DE-UZ 208 (v3, Jan 2021).*

*<sup>(1)</sup> For TS 1.2. and AC 1.1. equivalency means compliance check and demonstrating that fluff pulp used in manufacturing of the non-EU Ecolabel absorbent hygiene product meets or exceeds the requirements as stated in criterion 1.2 of Annex I to Commission Decision (EU) 2023/1809.*

*For TS1.2. at the time of writing (as of September 2024), suitably equivalent third-party certification schemes identified include Nordic Ecolabelling for Sanitary Products (v.6.9, June 2016) and Blue Angel DE-UZ 208 (v.3, Jan 2021).*

*For AC1.1. at the time of writing (as of September 2024), there are no labels that are suitable equivalents. However, Blue Angel DE-UZ 208 (v.3., Jan 2021) could be accepted as suitably equivalent third-party schemes under condition that only one type of pulp is used in the manufacturing of fluff pulp.*

*<sup>(1)</sup> For AC 1.2. equivalency means compliance check and demonstrating that emission to water and air from manufacturing of the non-EU Ecolabel absorbent hygiene products meets or exceeds the requirements as stated in criterion 1.3 of Annex I to Commission Decision (EU) 2023/1809. Compliance check shall include pulp and fluff pulp manufacturing, process i.e., for non – integrated pulp and paper production the verification should separately address pulping process and fluff pulp making process. For integrated production process, a combined verification shall suffice.*

*For AC 1.2. at the time of writing (as of September 2024), the suitably equivalent third-party scheme identified includes Nordic Ecolabel for Sanitary Products (v.6.9., June 2016) but only if read together with Nordic Ecolabelling for Paper Products – Basic Module (v 3.0). The equivalency of Blue Angel DE-UZ 208 (v.3) should be accepted based on a case-by-case analysis.*

*<sup>(1)</sup> For AC 1.3. equivalency means compliance check and demonstrating that CO2 emission from manufacturing of the non-EU Ecolabel absorbent hygiene product meets or exceeds the requirements as stated in criterion 1.4 of Annex I to Commission Decision (EU) 2023/1809. Compliance check shall include pulp and paper manufacturing, process i.e., for non – integrated pulp and fluff pulp production the verification should separately address pulping process and fluff pulp making process. For integrated production process, a combined verification shall suffice.*



*For AC 1.3. at the time of writing (as of September 2024), no suitably equivalent labels have been identified.*

*(<sup>1</sup>) For AC 1.4. equivalency means compliance check and demonstrating that energy consumption for manufacturing of the non-EU Ecolabel absorbent hygiene product meets or exceeds the requirements as stated in criterion 1.5 of Annex I to Commission Decision (EU) 2023/1809. Compliance check shall include pulp and paper manufacturing, process i.e., for non – integrated pulp and paper production the verification should separately address pulping process and fluff pulp making process. For integrated production process, a combined verification shall suffice.*

*For AC 1.4. at the time of writing (as of September 2024), the equivalent third-party scheme includes Nordic Ecolabelling for Sanitary products (v.6.9. June 2016) but only if the sum of points for energy and fuel does not exceed 2.5 (in line with the EUEL criterion 1.5). The equivalency of Blue Angel DE-UZ 208 (v.3) should be accepted based on a case-by-case analysis.*

## CRITERIA AREA 2: MAN – MADE CELLULOSE FIBRE

### TS 2.1. Sourcing of man-made cellulose fibres

For dissolving pulp produced from wood raw material

All (100%) dissolved pulp used in a product shall be legally sourced and covered by valid Chain of Custody (CoC) certificates issued by an independent third-party certification scheme such as the Forest Stewardship Council (FSC), the Programme for the Endorsement of Forest Certification (PEFC) or equivalent.

At least 70% of the wood raw material used for the production of dissolving pulp shall be covered by valid Sustainable Forestry Management (SFM) certificate issued by an independent third-party certification scheme such as FSC, PEFC or equivalent.

The certification bodies issuing forest and/or chain of custody certificates shall be accredited or recognised by that certification scheme.

For dissolving pulp produced from cotton linters

All cotton and other natural cellulosic seed fibres shall meet requirements of Technical specification TS 3.1.

### TS 2.2. Bleaching of man-made cellulose fibre

The pulp use to manufacture man-made cellulose fibre used in the absorbent hygiene product shall be elemental chlorine free (ECF) or totally chlorine free (TCF) bleached.

Chlorine gas shall not be used as a bleaching agent.

### AC 2.1. Organic halogens

Note: This criterion refers only to elemental chlorine free (ECF) pulp. Totally chlorine free (TCF) pulp automatically fulfils this requirement.

1) X points will be awarded when ECF pulp bleaching for each pulp used to manufacture man-made cellulose fibres demonstrated to comply with an emission limit for absorbable organic halogens (AOX) in accordance with criterion 2.2 of Annex I to Commission Decision (EU) 2023/1809.

2) X points will be awarded when ECF pulp bleaching for each pulp used to manufacture man-made cellulose fibres demonstrated to comply with thresholds for organically bound chlorine (OCI) content in accordance with criterion 2.2 of Annex I to Commission Decision (EU) 2023/1809.

### AC 2.2. Production of man-made cellulose fibre

1) X points will be awarded when man-made cellulose fibre manufacturing process demonstrated that more than 50 % of dissolving pulp used in the process had been obtained from dissolving pulp mills that recover value from their spent process liquor either by generating on-site electricity and/or steam or by manufacturing chemical co-products as specified in criterion 2.3 of Annex I to Commission Decision (EU) 2023/1809.

2) X points will be awarded when viscose and modal manufacturing process demonstrated to comply with maximum emission values in accordance with criterion 2.3 of Annex I to Commission Decision (EU) 2023/1809.

Verification:

*Absorbent hygiene products, which have been awarded the EU Ecolabel according to Annex I of Commission Decision (EU) 2023/1809 will be deemed to comply with the requirement.*

*Alternatively, the tenderer shall declare that the absorbent hygiene product has been certified by another third-party operated labelling scheme confirming that equivalent EU Ecolabel requirements are met<sup>(1)</sup>.*

*If the absorbent hygiene product does not carry a required label or an equivalent label, another equivalent means of proof must be provided.*

*<sup>(1)</sup> For TS 2.1. Equivalency means compliance check and demonstrating that dissolving pulp used in manufacturing of the non-EU Ecolabel absorbent hygiene products meets or exceeds the requirements of criterion 2.1 for wood raw material, and criterion 3.1 for cotton liners, as applicable, in line with Annex I to Commission Decision (EU) 2023/1809.*

*For TS 2.1. for sourcing of wood raw material for manufacturing of dissolving pulp, at the time of writing (as of September 2024), suitably equivalent third-party operated schemes identified include FSC and PEFC.*

*<sup>(1)</sup> For TS 2.2. and AC 2.1. equivalency means compliance check and demonstrating that dissolving pulp used in manufacturing of the non-EU Ecolabel absorbent hygiene product meets or exceeds the requirements as stated in criterion 2.2 of Annex I to Commission Decision (EU) 2023/1809.*

*For TS 2.1., at the time of writing (as of September 2024), suitably equivalent third-party certification schemes identified include Nordic*

*Ecolabelling for Sanitary Products (v.6.9, June 2016).*

*For AC 2.1.1 at the time of writing (as of September 2024), there have been no labels identified as suitable equivalents.*

*For AC 2.1.2. at the time of writing (as of September 2024), suitably equivalent third-party certification schemes identified include Nordic Ecolabelling for Sanitary Products (v.6.9, June 2016).*

*<sup>(1)</sup> For AC 2.2. equivalency means compliance check and demonstrating that man-made cellulose fibre used in manufacturing of the non-EU Ecolabel absorbent hygiene products meets or exceeds the requirements of criterion 2.3 of Annex I to Commission Decision (EU) 2023/1809.*

*For AC 2.2. at the time of writing (as of September 2024), there have been no labels identified as suitable equivalents.*

## CRITERIA AREA 3: COTTON AND OTHER NATURAL CELLULOSIC SEED FIBRE

### TS 3.1. Sourcing of cotton and other natural cellulosic seed fibre

All cotton and other natural cellulosic seed fibres shall be traceable and grown according to the requirements laid down in Council Regulation (EC) No 834/2007<sup>13</sup> and Regulation (EU) 2018/848<sup>14</sup> of the European Parliament and of the Council, the US National Organic Programme (NOP<sup>15</sup>) or equivalent legal obligations set by trade partners of the European Union.

The organic cotton content may include organically grown cotton and transitional organic cotton.

### TS3.2. Bleaching of cotton and other natural cellulosic seed fibre

Cotton and other natural cellulosic seed fibres used in a product shall be bleached using totally

<sup>13</sup> Council Regulation (EC) No 834/2007 of 28 June 2007 on organic production and labelling of organic products and repealing Regulation (EEC) No 2092/91 (OJ L 189, 20.7.2007, p. 1)

<sup>14</sup> Regulation (EU) 2018/848 of the European Parliament and of the Council of 30 May 2018 on organic production and labelling of organic products and repealing Council Regulation (EC) No 834/2007, PE/62/2017/REV/1 (OJ L 150, 14.6.2018, p. 1)

<sup>15</sup> National Organic Program, A Rule by the Agricultural Marketing Service on 12.21.2000, 65 FR 80547

chlorine free (TCF) techniques in accordance with criterion 3.2. of Annex I to Commission Decision (EU) 2023/1809.

Verification:

*Absorbent hygiene product, which have been awarded the EU Ecolabel EU Ecolabel according to Annex I of Commission Decision (EU) 2023/1809 will be deemed to comply with the requirement.*

*Alternatively, the tenderer shall declare that the absorbent hygiene product has been certified by another third-party operated labelling scheme confirming that equivalent EU Ecolabel requirements are met<sup>(1)</sup>.*

*If the absorbent hygiene product does not carry a required label or an equivalent label, another equivalent means of proof must be provided.*

*<sup>(1)</sup> For TS 3.1. and TS 3.2. equivalency means compliance check and demonstrating that cotton and other natural cellulosic seed fibre used in manufacturing of the non-EU Ecolabel absorbent hygiene products meets or exceeds for TS 3.1 - the requirements of criterion 3.1., and for TS 3.2 - the requirements of criterion 3.2 of Annex I to Commission Decision (EU) 2023/1809.*

*For TS 3.1. at the time of writing (as of September 2024), suitably equivalent third-party operated schemes identified include: Nordic Ecolabelling (v.6.9., June 2016) and Blue Angel DE-UZ 208 (v.3, Jan 2021).*

*For TS 3.2. at the time of writing (as of September 2024), suitably equivalent third-party operated scheme identified includes Blue Angel DE-UZ 208 (v.3, Jan 2021).*

## CRITERIA AREA 4: PRODUCTION PROCESS

TS 4.1. Material efficiency in the manufacturing of the final product

At the final assembly site, the waste that is generated during manufacturing and packaging of the absorbent hygiene products and sent to landfill or incineration without energy recovery shall not exceed:

(a) 8% by weight of the end products for tampons;

(b) 4% by weight of the end products for all the other products.

Verification:

*Absorbent hygiene product, which have been awarded the EU Ecolabel EU Ecolabel according to Annex I of Commission Decision (EU) 2023/1809 will be deemed to comply with the requirement.*

*Alternatively, the tenderer shall declare that the absorbent hygiene product has been certified by another third-party operated labelling scheme confirming that equivalent EU Ecolabel requirements are met<sup>(1)</sup>.*

*If the absorbent hygiene product does not carry a required label or an equivalent label, another equivalent means of proof must be provided.*

*<sup>(1)</sup> For TS 4.1. equivalency means compliance check and demonstrating that material efficiency in the manufacturing of the final non-EU Ecolabel absorbent hygiene products meets or exceeds the requirements of criterion 6 of Annex I to Commission Decision (EU) 2023/1809.*

*For TS 4.1. at the time of writing (as of September 2024), no suitably equivalent third-party operated scheme has been identified.*

## CRITERIA AREA 5: PACKAGING

TS 5.1. Cardboard, and/or paper used for packaging

Sales packaging made of cardboard and/or paper shall contain a minimum 40% of recycled material.

Grouped packaging made of cardboard and/or paper shall contain a minimum 80% of recycled material.

The remaining share (100% minus recycled content percentage) of cardboard and/or paper used for the sales and grouped packaging shall be SFM certified by an independent third-party certification scheme such as FSC, PEFC or equivalent.

### AC 5.1. Plastic used for packaging

X points will be awarded when the plastic material used in the sales packaging demonstrated to comply with a minimum content of recycled material in accordance with criterion 8(b) of Annex I to Commission Decision (EU) 2023/1809.

### TS 5.2. Non - use of composite material in packaging

Grouped packaging shall be avoided or made of only of cardboard and/or paper.

Packaging (sales and grouped) shall not be made of composite materials such as mixed plastics or paper coatings with plastics or metals, shall not be permitted.

### AC 5.2. Recyclability

X points will be awarded when sales and grouped packaging demonstrated to comply with the recyclability requirement in accordance with criterion 8(c) of Annex I to Commission Decision (EU) 2023/1809.

### TS 5.3. Information on recycled content and recyclability on product packaging

Recycled content and recyclability of sales and grouped packaging shall be indicated on the sales packaging.

Verification:

*Absorbent hygiene product, which have been awarded the EU Ecolabel EU Ecolabel according to Annex I of Commission Decision (EU) 2023/1809 will be deemed to comply with the requirement.*

*Alternatively, the tenderer shall declare that the absorbent hygiene product has been certified by another third-party operated labelling scheme confirming that equivalent EU Ecolabel requirements are met<sup>(1)</sup>.*

*If the absorbent hygiene product does not carry a required label or an equivalent label, another equivalent means of proof must be provided.*

*<sup>(1)</sup> For TS 5.1. and 5.2., and for AC 5.1., 5.2., and 5.3. equivalency means compliance check and demonstrating that the packaging used for the non-EU Ecolabel absorbent hygiene products*

*meets or exceeds the requirements of criterion 8 of Annex I to Commission Decision (EU) 2023/1809.*

*For TS 5.1. at the time of writing (as of September 2024), suitably equivalent third-party operated schemes identified include FSC and PEFC.*

*For TS 5.2. at the time of writing (as of September 2024), suitably equivalent third-party operated scheme identified includes Blue Angel DE-UZ 208 (v.3, Jan 2021).*

*For TS 5.3. at the time of writing (as of September 2024), no suitably equivalent third-party operated scheme has been identified.*

*For AC 5.1. at the time of writing (as of September 2024), no suitably equivalent third-party operated scheme has been identified.*

*For AC 5.2. at the time of writing (as of September 2024), for sales packaging, suitably equivalent third-party operated scheme identified includes Blue Angel DE-UZ 208 (v.3, January 2021).*

*For AC 5.2. at the time of writing (as of September 2024), no suitably equivalent third-party operated scheme has been identified.*

## FURTHER READING

This practical guide has been set out not only to provide guidance for the use of EU Ecolabel criteria to authorities awarding public contracts by recommending ready-to-use green criteria, but also to link to more detailed, market-based and science-based support for choosing these criteria in the first place. For more information on the research behind this practical guide, please consult the [JRC Background Report](#) [1], as well as the research reports supporting development of EU Ecolabel criteria for absorbent hygiene product, such as: [Preliminary Report](#) [2] and [Final Technical Report](#) [3]. For additional information on the EU Ecolabel criteria for this products group, readers are invited to visit the corresponding website of [DG Environment](#).

## REFERENCES

[1] Kowalska, M.A., Pérez-Camacho, M.N., Faraca, G., Wolf, O. Back-ground report to the guide for the use of the EU Ecolabel criteria in the green public procurement of absorbent hygiene products, Publications Office of the European Union, Luxembourg, 2024, doi:10.2760/293234, JRC138563.

[2] Pérez-Camacho, M. N., Faraca, G., Pérez Arribas, Z., Kowalska, M. A., Wolf, O, Sinkko, T., Tosches D., Revision of EU Ecolabel criteria for Absorbent Hygiene Products and Reusable Menstrual Cups (previously Absorbent Hygiene Products), Preliminary Report, Publications Office of the European Union, Luxembourg, 2023, doi:10.2760/467041, JRC134703.

[3] Faraca, G., Pérez-Camacho, M.N., Lag Brotons, A., Perez Arribas, Z., Kowalska, M.A. and Wolf, O., Revision of EU Ecolabel criteria for Absorbent Hygiene Products and Reusable Menstrual Cups (previously Absorbent Hygiene Products), Publications Office of the European Union, Luxembourg, 2023, doi:10.2760/209936, JRC134197.

[4] EC, 2023. Commission Decision (EU) 2023/1809 of 14 September 2023 establishing the EU Ecolabel criteria for absorbent hygiene products and for reusable menstrual cups. OJ L 234, 22.9.2023, p. 142–189.

[5] Blue Angel DE-UZ 208. Nappies, feminine hygiene and incontinence products (absorbent hygiene products, AHP) - Basic award criteria, January 2021, version 3, available at:

<https://www.blauer-engel.de/en/productworld/nappies-feminine-hygiene-and-incontinence-products>.

[6] Nordic Ecolabelling for Sanitary Products, Version 6.9. 14 June 2016 - 31 December 2025, available at: <https://api.svanemaerket.dk/api/docs/CriteriaDocumentFiles/7444>

## DISCLAIMER OR OTHER FINAL DETAILS

Generally speaking, these criteria can be copy-pasted into calls for tender so long as the subject matter of the contract is relevant. Care should be taken that these criteria do not end up discriminating against other products. To avoid this, the subject matter should be clearly defined as an absorbent hygiene product.

Compliance with the criteria recommended here can be assured by relevant absorbent hygiene products carrying the EU Ecolabel. In some cases, other labels can be considered as proof of compliance too, but this can change over time as criteria for other ecolabels are updated. In all cases, allowance must be made for equivalent means of proof for products with no label.

Public procurers can require the above-mentioned and recommended ecolabels as means of proof that the works, services or supplies comply with the proposed formulation of EU GPP criteria. Pursuant to Article 43 of Directive 2014/24/EU of the European Parliament and of the Council of 26 February 2014 on public procurement and repealing Directive 2004/18/EC procurers remain free to further assess and/or use any other Ecolabels as means of proof.

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