

Ecolabelling

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17. December 2010

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Nordic Ecolabelling has prepared a proposal for revised criteria for ecolabelling, we would like to receive your comments **no later than 1. March 2011**.

Proposal for the criteria:

-Nordic Ecolabelling of Paper Products – Basic Module, version 2,

-Nordic Ecolabelling of Paper Products – Chemical Module, version 2

-Background document of Basic and Chemical Module

-Nordic Ecolabelling of Copy and Printing paper, Supplementary Module, version 4 background –

-Background document of Copy and Printing paper

Comments and standpoint

Supports the proposal entirely

x Supports the proposal but with the following objections:

Refrain from giving comments and standpoints.

Refrain from giving comments and standpoints, but propose following changes.

Rejects the proposal on the following basis:

Objections:

I have been informed that the use of genetic engineering in the production of paper products is suggested to exclude such products from being Swan labelled.

After working for more than 20 years on sustainability in the use of biomass, and in using biomass to replace petrochemicals I find this extremely odd. Considering the challenge of climate change, and depletion of oil resources, all technical means to improve the environment should be employed. One of the technical tools available is genetic engineering, both in plant breeding, and in developing microbes and enzymes for technical processes

I find in the description of the Swan philosophy the following:

Potential is evaluated against the background of the potential for environmental gains that exists within the product group in question, for example the distinction between existing products and technical innovations that are viewed as realistic within the near future.

Genetic engineering has already proven its capability to create environmentally improved processes, and to increase the value of biomass which otherwise is treated as waste. The potential for added gains is huge. The Swan label is intended to help consumers in selecting environmentally sound products. By selecting against environmentally sound production technologies the Swan label would act against its principles

further comment/documentation are enclosed

Reply from:

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