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## **Position on carbon footprint labelling of toilet tissue**

### **Introduction**

ETS is the European Tissue Paper Industry Association. The members of ETS represent the majority of tissue paper producers throughout Europe and around 90% of the total European tissue production. ETS was founded in 1971 and is based in Brussels.

As manufacturers of single use products, the tissue sector is committed to promoting sustainable development through its business activities and this includes reducing the carbon footprint of its products and operations wherever possible. This position paper summarises ETS's position on the carbon footprint labelling of toilet tissue.

### **What is a carbon footprint?**

The **carbon footprint is a single impact category** of Life Cycle Assessment (LCA) and is used to specifically understand the greenhouse gas emissions associated with the life cycle of a particular product. The carbon footprint is not just about the emissions of carbon dioxide but also includes the contribution of other greenhouse gases such as methane and nitrous oxide.

**Life Cycle Assessment** is an internationally recognized methodology, based on the ISO 14040 - 14044 **series of standards** which are used to identify potential environmental impacts and improvement opportunities across raw material production, transportation, finished product manufacturing, consumer use and disposal.

The international standard ISO 14025 on Type III Environmental Declaration recommends that industry sector guidelines, namely the Product Category Rules (PCR), should be used when calculating LCA's (which include greenhouse gas emissions) for products.

Such guidelines exist for Tissue products: PCR 2011:05, v 1.0.

### **ETS position on communicating the carbon footprint of toilet tissue on packs**

ETS members are concerned that labelling products with carbon numbers only takes into consideration **one environmental impact in isolation**, rather than looking at the whole environmental picture as with LCA. This

could lead to anomalies, for example where a lower carbon footprint is accompanied by higher waste or water usage.

ETS members believe that, despite having credible data, putting numbers for carbon emissions on toilet tissue packs does not currently provide relevant information nor support decision-making by the end consumer.

Many stakeholders, including the European Commission and the European retail community, agree that consumers need to be educated about the environmental impacts, including that of carbon footprints before labelling can be successful and relevant.

## **ETS carbon footprint study on toilet tissue**

In 2008, ETS decided to calculate the carbon footprints of European average toilet tissue. ETS also wanted to consider the advantages and drawbacks of communicating carbon footprints on packs.

Expert consultants operating to ISO 14040 - 14044 standards for life cycle assessment were commissioned to carry out the work. The consultants calculated the carbon footprints of industry average toilet tissue made with different types of fibres, using Life Cycle Assessment (LCA) methodology. Certain aspects were not reported, in particular carbon sequestration (carbon storage/fixation) in the forests and the end-life for toilet tissue, owing to the difficulty in producing meaningful averages for these areas.

The results showed that there was little difference in the carbon footprint of different fibre types of toilet tissue produced in Europe. They did show that the type of external energy (fossil, nuclear, hydroelectric etc.) used in processing, is the largest contributing factor for the industry's average carbon footprint.

See: <http://www.europeantissue.com/wp-content/uploads/091126-Carbonfootprint-of-toilet-tissue12.3.20091.pdf>

Having analysed the results, as well as the various methodologies for calculating carbon footprints across Europe, ETS concluded that putting any kind of numbers on packs of toilet tissue would not be relevant and potentially misleading for consumers.

However, the project established that the contribution of toilet paper, at around 22 grams of CO<sub>2</sub> per day towards a standard average person's daily carbon usage is small (typically 23.3 kg of CO<sub>2</sub> per day per head in the former EU 25 member states - see reference 1). And most important, in terms of hygiene benefits, toilet paper cannot be easily replaced.

## Reasons for not communicating industry average carbon numbers on packs

1. Carbon is only one element of environmental / sustainability impact of a product.
2. With a fast moving consumer product such as tissue, the likelihood that any 'footprint' will change in a short period of time is quite high due to changes in packaging, transport, manufacturing etc. This variance makes it both impractical and misleading to offer a 'fixed' footprint on a specific product.
3. For toilet tissue, it is quite difficult to define a functional unit as the designs of different toilet paper products vary (e.g. number of plies, size of sheets, etc.). Therefore ETS have used 'per average usage' as functional unit in the study. This makes it difficult for any user to make informed choices between types of tissue.

## Conclusion

Toilet tissue is an essential product for delivering personal hygiene and there are currently no relevant alternative products available. Toilet tissue exists in many different designs to ensure that the hygiene needs and preferences of consumers are met. To place a carbon footprint label on packs at this point in time would not provide relevant information for consumers at the point of purchase.

Finally, it should be remembered that the carbon emissions associated with the consumption of toilet tissue represent only a small fraction of the carbon emissions associated with many other common activities, for example:

*'The production of 10 kg of tissue paper, i.e. the average we each in Europe use every year (tissue paper includes toilet paper, kitchen rolls, facial tissues, paper hand towels), creates some 13 kg of CO<sub>2</sub> emissions. From the total tissue the share of toilet tissue is 6 kg and respectively 8 kg CO<sub>2</sub> emissions, which nets out around 22 grams of CO<sub>2</sub> per day. This is hardly comparable to many other small scale domestic daily activities, and is roughly equivalent to the CO<sub>2</sub> produced by an average family car over a distance of only 140 metres.'* (Source: Outlook for world tissue business 10/2008 by Risi)

## The Future

ETS therefore proposes that any future use of carbon footprint or other environmental labels on consumer products should:

- Be based on life-cycle thinking and sound science; this means including other environmental impacts such as water and waste, not just greenhouse gas emissions.
- Be based on truly global, harmonised and international standards such as the ISO 14040-series for LCA and the ISO 14025 for creating

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Product Category Rules. This will improve accuracy and reduce variability of the analysis.

- Take note of relevant European Commission proposals such as the ones on organisational and product environmental footprints;  
(<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:124:0001:0210:EN:PDF>)
- Result in credible and relevant information for consumers, customers and other stakeholders.

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*Reference 1: The World Resources Institute (2005) 'Navigating the Numbers, Greenhouse data and International Climate Policy' by Baumert, Herzog and Pershing, quotes that the EU 25 CO2 emissions per capita are 8.5 tonnes per year or 23.3 kg per day.*

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