

## CRITERIA FOR THE ENVIRONMENTAL LABELING OF PERSONEL HYGIENE PRODUCTS

### GENERAL FRAMEWORK

**ARTICLE 1-** These criteria are regulated within the scope of “Environmental Label Regulation<sup>1</sup>” dated 19.10.2018 and numbered 30570.

**ARTICLE 2-** The product group ‘absorbent hygiene products’ shall comprise any article whose function is to absorb and retain human fluids such as urine, faeces, sweat, menstrual fluid or milk, excluding textile products. The product group “absorbent hygiene products” shall include products for both private and professional use.

The product group shall not include wet wipes and any other type of products falling under the scope “Medical Device Regulation<sup>2</sup>” published in the Official Gazette dated 02.06.2021 and numbered 31499.

**ARTICLE 3-** Within the scope of the Environmental Label Regulation, the criteria specified in this document must be fulfilled in order to be given an environmental label for the products in the absorbent hygiene products group.

**ARTICLE 4-** The assessment and verification requirements regarding the environmental label criteria determined for the absorbent hygiene product group will be valid for 5 (five) years. The criteria may be updated when deemed necessary by the Environmental Labeling Board within five years. The criteria’s validity period can be extended with the Environmental Labeling Board’s approval.

### DEFINITIONS

The following definitions will be used in order to apply these criteria:

**CTMP:** Fluff pulp produced by Chemi–Thermo Mechanical Pulp method;

**Air dry tonne (ADt):** 90% dry matter content for pulp;

**Cellulose Pulp:** Fibrous material mainly composed of cellulose and obtained from the treatment of lignocellulosic materials with one or more aqueous solutions of pulping and/or bleaching chemicals;

**Optical Brightener and Fluorescent Whitening Agent:** Any additive used with the only purpose of ‘whitening’ or ‘brightening’ the material;

**Plastic Materials (Plastics):** Synthetic polymers to which additives or other substances may have been added which can be molded and used as main structural component of final

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<sup>1</sup>Environmental Label Regulation:

<https://www.mevzuat.gov.tr/mevzuat?MevzuatNo=25883&MevzuatTur=7&MevzuatTertip=5>

<sup>2</sup> Medical Device Regulation:

<https://www.mevzuat.gov.tr/mevzuat?MevzuatNo=38657&MevzuatTur=7&MevzuatTertip=5>

materials and articles;

**Synthetic Polymers:** Macromolecular substances, other than cellulose pulp, obtained either by a polymerization process or chemical modification of natural or synthetic macromolecules or microbial fermentation;

**Super Absorbent Polymers (SAP):** Synthetic polymers designed for absorbing and retaining large amounts of liquid compared to their own mass.

## CRITERIA

**Criteria 1-** Product Description

**Criteria 2-** Fluff Pulp

**Criteria 3-** Man-Made Cellulose Fibres (Including Viscose, Modal, Lyocell, Cupro, Triacetate)

**Criteria 4-** Cotton and Other Natural Cellulosic Seed Fibres

**Criteria 5-** Plastic Materials and Superabsorbent Polymers

**Criteria 6-** Other Materials and Components

**Criteria 7-** Excluded or Limited Substances or Mixtures

**Criteria 8-** Material Efficiency in The Manufacturing

**Criteria 9-** Guidance on The Product Disposal

**Criteria 10-** Fitness for Use and Quality of The Product

**Criteria 11-** Information Appearing on The Turkish Environmental Label

## ASSESSMENT AND VERIFICATION REQUIREMENTS

The assessment and verification requirements for each criterion are outlined in the relevant sections.

Where the applicant is required to provide declarations, documentation, analyses, test reports or other evidence to show compliance with the criteria, these may originate from the applicant and/or his supplier(s) and/or their suppliers, etc., as appropriate.

The Ministry recognises the tests performed by laboratories accredited by an accreditation body that is a party to the International Laboratory Accreditation Association (ILAC) - Mutual Recognition Agreement (MRA) according to TS EN ISO/IEC 17025. TÜRKAK accredited organisations can be accessed at <https://portal.turkak.org.tr/tr/accreditation/accreditationagencysearch>.

TS EN ISO/IEC 17025 accreditation condition is not required if it is documented that there is no accredited organisation for the test method, which is mandatory within the scope of evaluation and verification requirements.

When generating data for the classification of substances or mixtures, the provisions of the

“Regulation on Test Methods to be Applied in Determining the Physico-Chemical, Toxicological and Ecotoxicological Properties of Substances and Mixtures<sup>3</sup>” published in the Official Gazette dated 11.12.2013 and numbered 28848 shall be taken into consideration.

The applicant shall have fulfilled the necessary obligations within the scope of the “Environmental Law<sup>4</sup>”, which entered into force after being published in the Official Gazette dated 11.08.1983 and numbered 18132, and the applicable legislation enacted pursuant to this law. Accordingly, the applicant is obliged to submit the Environmental Impact Assessment Decision, Environmental Permit, Zero Waste Certificate, Waste Management Plan, and other documents requested by the Ministry.

Where appropriate, the Ministry may request supporting documentation and carry out independent verifications and site visits.

## **CRITERIA AND REQUIREMENTS**

### **CRITERION 1. Product Description**

A description of the product and packaging shall be provided (product name, classification, functionalities) together with information on all of the following characteristics:

- The total weight of the product and packaging,
- The components, materials and additives used in the product with their respective weights and, whenever applicable, their respective CAS numbers.

**Assessment and Verification:** The applicant shall provide a sample of the product and a report including the technical description and the weight of the product and of each component, material and additive used.

### **CRITERION 2. Fluff Pulp**

#### **Criterion 2.1. Sourcing**

All pulp fibres shall be covered by valid chain of custody certificates issued by an independent third party certification scheme such as Forest Stewardship Council (FSC), Programme for the Endorsement of Forest Certification (PEFC) or equivalent.

A minimum of 25 % pulp fibres shall be covered by valid Sustainable Forestry Management Certificates issued by an independent third party certification scheme such as FSC, PEFC or equivalent.

The remaining proportion of pulp fibres shall be covered by a verification system which

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<sup>3</sup> Regulation on Test Methods to be Applied in Determining the Physico-Chemical, Toxicological and Ecotoxicological Properties of Substances and Mixtures:

<https://www.mevzuat.gov.tr/mevzuat?MevzuatNo=19109&MevzuatTur=7&MevzuatTertip=5>

<sup>4</sup> Environmental Law:

<https://www.mevzuat.gov.tr/mevzuat?MevzuatNo=2872&MevzuatTur=1&MevzuatTertip=5>

ensures that it is legally sourced and meets any other requirement of the certification scheme with respect to uncertified material.

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

**Assessment and Verification:** The applicant shall obtain from the pulp manufacturer(s) valid, independently certified chain of custody certificates demonstrating that fibres have been grown according to Sustainable Forestry Management Principles and/or are from legal and controlled sources.

FSC, PEFC or equivalent schemes shall be accepted as independent third party certification.

### **Criterion 2.2. Bleaching**

The pulp used in the product shall not be bleached with the use of chlorine gas. In case other bleaching chemicals are used, the total amount of AOX (adsorbable organic halogens) emissions in the wastewater discharged from pulp manufacturing shall not exceed 0.17 kg/ADT.

**Assessment and Verification:** The applicant shall provide a declaration from the pulp manufacturer that chlorine gas was not used and a test report showing compliance with the AOX limit value. TS EN ISO 9562 or the equivalent proven tests shall be accepted as test methods, accompanied by detailed calculations showing compliance with this requirement, together with related supporting documentation.

The supporting documentation shall include an indication of the measurement frequency. Wastewater AOX content shall only be measured in processes where chlorine compounds are used for bleaching of the pulp.

AOX measurements shall be taken on samples at the final effluent (discharge) point of the wastewater treatment plant of the pulp manufacturing facility and without any filtration or settling process. In case the wastewater of the pulp manufacturing facility is treated in a joint treatment plant, AOX values will be measured in the samples taken from the wastewater discharge point of the plant that have not undergone any filtration or settling process and the amount of AOX emission of the pulp manufacturing plant will be calculated by multiplying it with the annual average AOX removal percentage of the joint treatment plant. The AOX treatment efficiency will be calculated using the annual average AOX removal percentage of the joint treatment plant and will be based on information provided by the operator of the plant.

Information on AOX emissions shall be expressed as an annual average from measurements made at least every 2 months. In the case of a new-built production facility or an upgraded production line, once the emission values of the facility have stabilized, emission measurements will be taken once a week for 45 consecutive days. They shall be representative of the respective campaign.

### **Criterion 2.3. Optical Brighteners and Colouring Agents**

Optical brighteners and colouring agents, including fluorescent whitening agents, shall not be added to the pulp.

**Assessment and Verification:** The applicant shall provide a declaration from the supplier that the requirements have been fulfilled.

**Criterion 2.4. Emission of Chemical Oxygen Demand (COD) and Phosphorous (P) to Water, Sulphur (S) Compounds and NOx to Air from Production**

The emissions to air and water from the pulp production shall be expressed in terms of “emission points” ( $P_{COD}$ ,  $P_P$ ,  $P_S$ ,  $P_{NOx}$ ). Emission point is calculated by dividing actual emission by the reference values reported in Table 1.

- None of the individual emission points  $P_{COD}$ ,  $P_P$ ,  $P_S$ ,  $P_{NOx}$ , shall exceed 1.5.
- The total number of emission points ( $P_{total} = P_{COD} + P_P + P_S + P_{NOx}$ ) shall not exceed 4.0.

For each pulp “i” sourced, the related measured emissions (expressed in kg/air dried tonne - ADt) shall be weighted according to the proportion of each pulp (“i”) used. For example, for COD, the weighted average of the  $COD_{pulp,i}$  values shall be taken (according to the percentages in the pulp) and the calculated COD value will be divided by the reference COD value to calculate the  $P_{COD}$  (emission point) value. When calculating the reference COD ( $COD_{ref,total}$ ) value, the reference values given in Table 1 will be used for each pulp used.

$$P_{COD} = \frac{COD_{total}}{COD_{ref,total}} = \frac{\sum_{i=1}^n pulp_i \times COD_{pulp,i}}{\sum_{i=1}^n pulp_i \times COD_{ref,pulp,i}}$$

**Table 1.** Reference values for emissions from different pulp types and from pulp production

Pulp Grade	Reference Values (kg/ADt)			
	$COD_{ref}$	$P_{ref}$	$S_{ref}$	$NOx_{ref}$
Bleached Chemical Pulp (Others Than Sulphite)	18.0	0.045 (*)	0.6	1.6
Bleached chemical pulp (sulphite)	25.0	0.045	0.6	1.6
CTMP	15.0	0,01	0.2	0.3

(\*) Net emissions of P are considered in the calculation. The P naturally contained in wood raw materials and in water can be subtracted from the total emissions of P. Reductions up to 0.010 kg/ADT shall be accepted.

In case of a co-generation of heat and electricity at the same plant, the emissions of S and NOx resulting from electricity generation shall be subtracted from the total amount. The following equation shall be used to calculate the proportion of the emissions resulting from heat generation:

$$\frac{MWh (heat) - MWh (heat) sold}{MWh (heat) + 2 \times MWh (heat)}$$

Where,

- MWh (electricity) is the electricity produced at the co-generation plant,
- MWh (heat) is the useful heat produced in a cogeneration process,

- MWh (heat)sold is the useful heat that is used outside the pulp manufacturing plant.

**Assessment and Verification:** The applicant shall provide detailed calculations showing compliance with this criterion, together with related supporting documentation which shall include test reports using the following (or equivalent) test methods:

- COD: ISO 15705, ISO 6060 or TS 2789
- P: TS EN ISO 6878
- S (oxid.): TS EN 14791 or EPA no 8
- S (red.): EPA no 15A, 16A or 16B
- S content in oil: TS EN ISO 8754
- S content in coal: ISO 19579
- NOx: TS EN 14792 or TS ISO 11564

The supporting documentation shall include an indication of the measurement frequency and the calculation of the points for COD, P, S and NOx. Emissions to air shall include all emissions of S and NOx that occur during the production of pulp and paper, including steam generated outside the production site. The emissions from the production of electricity shall be subtracted from the total calculated emissions. Emission measurements shall include recovery boilers, limekilns, steam boilers, and destructor furnaces for strong-smelling gases. Reported emission values for S to air shall include both oxidised and reduced S emissions. Diffuse emissions shall be taken into account.

Reported S emissions shall include oxidized or reduced sulphur emissions (dimethyl sulfide, methyl mercaptan, hydrogen sulfide, etc.). The S emissions related to the heat energy generation from oil, coal and other external fuels with known S content may be calculated instead of measured and shall be taken into account.

Samples for wastewater discharges will be taken from the final outlet of the facility's wastewater treatment plant and analyses will be performed on samples that have not undergone any filtration or sedimentation.

In case the wastewater of the pulp manufacturing facility is treated in an urban wastewater treatment plant or an joint treatment plant, the samples taken from the wastewater discharge point of the pulp manufacturing plant that have not undergone any filtration or settling process and the results obtained shall be multiplied by the annual average treatment efficiency of the urban wastewater treatment plant or joint treatment plant for that parameter. The operator of the wastewater treatment plant must provide data on the average annual treatment efficiency of the the urban wastewater treatment plant or joint treatment plant.

Such data shall be provided to reflect the last six months prior to the application and to prove the production time of the products for which the Environmental Label application is made. For the first Environmental Label application, total P measurement for the last 2 months is sufficient.

In cases where a new or re-built production plant, the emission measurement values to be

made every other day for 45 consecutive days will be taken as the basis after the emission values of the plant have stabilized.

### Criterion 2.5. Emissions of CO<sub>2</sub> from Production

CO<sub>2</sub> emissions from non-renewable energy sources used in the pulp production shall not exceed 450 kg per tonne of pulp produced, including emissions from the production of electricity (whether on-site or off-site).

In the calculations, the CO<sub>2</sub> emission factors of the fuels for 2020 in the Türkiye Greenhouse Gas Emission Inventory published by the Turkish Statistical Institute in April 2022 will be used for the fuel-based emissions given in Table 2.

In calculation of the CO<sub>2</sub> emissions from grid electricity used in production, the electricity emission factors in the “Türkiye Electricity Generation and Electricity Consumption Point Emission Factors Information Form” published by the Ministry of Energy and Natural Resources on August 9, 2022 will be applied (Table 2).

**Table 2.** Emission Factors for CO<sub>2</sub> Emissions from Different Energy Sources

Fuel	CO <sub>2</sub> Fossil Fuel Emissions	Unit
Hard Coal	91,8	t CO <sub>2</sub> fossil / TJ
Lignite	104,8	t CO <sub>2</sub> fossil / TJ
Asphaltite	96,1	t CO <sub>2</sub> fossil / TJ
Kok	110,7	t CO <sub>2</sub> fossil / TJ
Coal Tar	80,7	t CO <sub>2</sub> fossil / TJ
Crude Oil	73,7	t CO <sub>2</sub> fossil / TJ
Petroleum Coke	97,4	t CO <sub>2</sub> fossil / TJ
Fuel oil	77	t CO <sub>2</sub> fossil / TJ
Diesel	72,3	t CO <sub>2</sub> fossil / TJ
Gasoline	69,3	t CO <sub>2</sub> fossil / TJ
LPG	63,1	t CO <sub>2</sub> fossil / TJ
Refinery Gas	57,6	t CO <sub>2</sub> fossil / TJ
Aircraft Fuel	71,5	t CO <sub>2</sub> fossil / TJ
Gas Oil	71,9	t CO <sub>2</sub> fossil / TJ
Nafta	72,7	t CO <sub>2</sub> fossil / TJ
Intermediate Products	73,3	t CO <sub>2</sub> fossil / TJ
Base Oil	73,3	t CO <sub>2</sub> fossil / TJ
White Spirit	73,3	t CO <sub>2</sub> fossil / TJ
Bitumen	80,7	t CO <sub>2</sub> fossil / TJ
Other Petroleum Products	73,3	t CO <sub>2</sub> fossil / TJ
Natural gas	53,7	t CO <sub>2</sub> fossil / TJ
Wood	111,8	t CO <sub>2</sub> fossil / TJ
Animal and Vegetable Waste	100,1	t CO <sub>2</sub> fossil / TJ
Biofuel	91,8	t CO <sub>2</sub> fossil / TJ
Emission Factor at Point of Consumption Connected to Transmission Line	0.444	t CO <sub>2</sub> / MWh
Emission Factor at Point of Consumption Connected to Distribution Line	0.481	t CO <sub>2</sub> / MWh

**Assessment and Verification:** The applicant shall provide detailed calculations showing compliance with this requirement, together with related supporting documentation.

The applicant shall provide data on the air emissions of CO<sub>2</sub>. This shall include all sources of non-renewable fuels during the production of pulp, including the emissions from the production of electricity (whether on-site or offsite).

CO<sub>2</sub> emission measurements, shall be made for a 12-month production period. In cases where a new or re-built production plant, the calculations shall be based on emission measurements of the facility once a week for at least 45 consecutive days.

For electricity supplied from the grid, the stated value will be used unless the applicant submits documentation establishing the average CO<sub>2</sub> emission value for electricity suppliers (committed suppliers), in which case the applicant may use this value instead of the stated value in the Table 2. If the documents provided by the suppliers determining the CO<sub>2</sub> emission value are eligible, the applicant may use this value. The documents used as proof of compliance will include technical specifications (i.e. copy of a contract) showing the average value.

The renewable electricity value may be excluded from the calculation if the applicant certifies that it uses electricity from renewable energy sources in accordance with the relevant provisions of Law No. 6446 and Law No. 5346 and the relevant legislation. Otherwise, the value given for all grid electricity will be used.

When calculating CO<sub>2</sub> emissions for renewable energy purchased and used in production processes, "zero CO<sub>2</sub> emissions" shall be acceptable. The applicant must provide documentary proof that such energy is actually utilized or purchased from an external source. The applicant may also submit greenhouse gas emission reports prepared in accordance with the terms of the "Regulation on Monitoring of Greenhouse Gas Emissions," which entered into force upon publication in the Official Gazette on 17 May 2014 under number 29003.

### **CRITERION 3. Man-made cellulose fibres (including viscose, modal, lyocell, cupro, triacetate)**

#### **Criterion 3.1. Sourcing**

(a) All pulp fibres shall be covered by valid chain of custody certificates issued by an independent third-party certification scheme such as FSC, PEFC or equivalent.

A minimum of 25 % pulp fibres shall be covered by valid Sustainable Forestry Management certificates issued by an independent third-party certification scheme such as FSC, PEFC or equivalent.

The remaining proportion of pulp fibres shall be covered by a verification system which ensures that it is legally sourced and meets any other requirement of the certification scheme with respect to uncertified material.

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

(b) Dissolving pulp produced from cotton linters shall meet the Criterion 4.1 for cotton (Sourcing and Traceability).



**Assessment and Verification:**

- (a) The applicant shall obtain from the pulp manufacturer(s) valid, independently certified chain of custody certificates demonstrating that fibres have been grown according to Sustainable Forestry Management principles and/or are from legal and controlled sources. FSC, PEFC or equivalent schemes shall be accepted as independent third party certification.
- (b) The application shall provide evidence of compliance according to Criterion 4.1 for cotton (Sourcing and Traceability).

**Criterion 3.2. Bleaching**

The pulp used to manufacture fibres shall not be bleached with the use of chlorine gas. The total amount of AOX and organically bound chlorine (OCI) from pulp production shall not exceed either of the following:

- 0.170 kg AOX/ADt, if measured in the wastewater from pulp manufacturing (AOX), or
- 150 ppm OCI, if measured in the finished fibres.

**Assessment and Verification:** The applicant shall provide a declaration from the pulp supplier that chlorine gas is not used, together with a test report showing compliance with either the AOX or the OCI requirement, using the appropriate test method:

- AOX TS EN ISO 9562 or the equivalent tests
- TS ISO 11480 for OCI.

Frequency of measurement for AOX shall be set in accordance with the Criterion 2.2 for fluff pulp.

**Criterion 3.3. Optical Brighteners and Colouring Agents**

Optical brighteners and colouring agents, including fluorescent whitening agents, shall not be intentionally added to the fibres.

**Assessment and Verification:** The applicant shall provide a declaration from the supplier that the requirements have been fulfilled.

**Criterion 3.4. Production of Fibres**

- (a) More than 50 % of pulp used to manufacture fibres shall be obtained from dissolving pulp mills that recover value from their spent process liquor either by:
  - Generating on-site electricity and steam, or,
  - Manufacturing chemical co-products.
- (b) The following limit values for the emission of sulphur compounds to air shall be respected in the viscose and in the modal fibres production process:

**Table 3.** Sulphur Emission Values for Viscose and Modal Fibre Production

Fibre Type	Sulphur emissions to air - Limit value (g S /kg fibre)
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Staple Fibre	30
Filament Fibre	
- Batch Washing	40
- Integrated Washing	170
Note: Limit values expressed as annual average.	

**Assessment and Verification:**

- (a) The applicant shall make the fibres manufacturers to provide a list of pulp suppliers used to produce the fibres and the proportion they supply. Supporting documentation and evidence shall be provided that the required proportion of suppliers has the appropriate energy generating equipment or co-product recovery and manufacturing systems installed at related production sites.
- (b) The applicant shall provide detailed documentation and test reports showing compliance with this criterion, together with a declaration of compliance.

**CRITERION 4. Cotton and Other Natural Cellulosic Seed Fibres**

**Criterion 4.1. Sourcing and Traceability**

- (a) Cotton shall be grown in accordance with the “Regulation on the Principles and Practice of Organic Agriculture<sup>5</sup>” published in the Official Gazette dated 18.08.2010 and numbered 27676, in the US National Organic Program (NOP) or the EU Organic Regulation (EC) No. 834/2007. Organic cotton content; may include organically grown cotton or cotton that is in transition to organic cotton.
- (b) Cotton grown according to criterion 4.1(a) and used to manufacture absorbent hygiene product shall be traceable from the point of verification of the production standard.

**Assessment and Verification:**

- (a) Organic cotton content shall be certified by an independent control body to have been produced in conformity with the production and inspection requirements laid down in the Regulation on the Principles and Practice of Organic Agriculture, the US National Organic Program (NOP) or the EU Organic Regulation (EC) No. 834/2007 or equivalent legal requirements issued by other trading partners. This verification shall be provided separately on an annual basis for each country of origin from which cotton is sourced.
- (b) The applicant shall demonstrate compliance with the cotton content requirement for the annual volume of cotton purchased to manufacture the final product(s) and according to each product line on an annualised basis: Transaction records or invoices shall be provided that document the quantity of cotton purchased on an annual basis from farmers or producer groups, and the total weight of certified bales.

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<sup>5</sup> Regulation on the Principles and Practice of Organic Agriculture:  
<https://www.mevzuat.gov.tr/mevzuat?MevzuatNo=14217&MevzuatTur=7&MevzuatTertip=5>

#### **Criterion 4.2. Bleaching**

Cotton shall not be bleached with the use of chlorine gas.

**Assessment and Verification:** The applicant shall provide a declaration from the supplier that chlorine gas is not used.

#### **Criterion 4.3. Optical Brighteners and Colouring Agents**

Optical brighteners and colouring agents, including fluorescent whitening agents, shall not be added to the cotton.

**Assessment and Verification:** The applicant shall provide a declaration from the supplier that the requirements have been fulfilled.

### **CRITERION 5. Plastic Materials and Superabsorbent Polymers**

#### **Criterion 5.1. Production of Synthetic Polymers and Plastic Materials**

All plants producing synthetic polymers and plastic materials used in the product shall have systems in place to address the following objectives:

- Water-saving (e.g. monitoring of water flow in a facility and circulating the water in closed system),
- Implementing Integrated waste management plan to optimise prevention, reuse, recycling, recovery and final disposal of waste (e.g. separation of different waste fractions),
- Optimisation of energy efficiency and energy management (e.g. reuse of the steam generated during the manufacture of SAPs).

**Assessment and Verification:** The applicant shall provide a declaration of compliance with the requirement from the suppliers. The declaration shall be supported by a report describing in detail the procedures adopted by the suppliers in order to fulfil the requirement for each of the sites concerned.

#### **Criterion 5.2. Additives in Plastic Materials**

- (a) The contents of lead, cadmium, chromium (VI) and related compounds in each plastic material and synthetic polymer used in production shall be lower than 0.2 mg/kg for lead, 0.1 mg/kg for cadmium and 1 mg/kg for chromium (VI) by mass of the product.
- (b) Additives used in plastics in concentration above 0.10% by weight shall not be classified in any of the following hazard classes in Annex-1 of the "Regulation on Classification, Labeling

and Packaging of Substances and Mixtures<sup>6</sup> published in the Official Gazette dated 11.12.2013 and numbered 28848:

- Carcinogenic, mutagenic or toxic for reproduction, categories 1a, 1b and 2 (H340, H350, H350i, H360F, H360D, H360FD, H360Fd, H360Df),
- Acutely toxic, categories 1 and 2 (H300, H310, H330, H304),
- Toxic to specific target organs, category 1: (H370, H372),
- Hazardous to the aquatic environment, categories 1 and 2 (H400, H410, H411).

**Assessment and Verification:** (a), (b) The applicant shall provide a declaration of compliance with the requirements from the suppliers. A list of added substances shall be also provided, including concentrations and related H statements/R phrases, supported by safety data sheets (SDS).

In order to facilitate follow-up and monitoring of the documentation provided, a random sample of suppliers may be examined. The supplier shall provide access to production facilities, warehouses and similar installations. Confidentiality applies to any documentation and information submitted and shared.

### **Criterion 5.3. Superabsorbent Polymers (SAP)**

- (a) Acrylamide (CAS number: 79-06-1) shall not be added to the product.
- (b) Superabsorbent polymers used in the product may contain a maximum of 1 000 ppm residual monomers that are classified with the H-statements reported in Criterion 7 on Excluded or Limited Substances or Mixtures. For sodium polyacrylate these represent total of unreacted acrylic acid and cross linkers.
- (c) Superabsorbent polymers used in the product may, as a maximum, contain 10 % (weight/weight) of water-soluble extracts and these shall comply with Criterion 7 on Excluded or Limited Substances or Mixtures. For sodium polyacrylate these represent monomers and oligomers of acrylic acid with lower molecular weight than the superabsorbent polymer according to ISO 17190.

#### **Assessment and Verification:**

- (a) The applicant shall provide a declaration of non-use of the substance.
- (b) The applicant shall provide a declaration from the supplier documenting the composition of the super absorbent polymer(s) used in the product. This shall be done by means of product SDSs which specify the full name of the product, the CAS number and the residual monomers contained in the product classified in accordance with the requirement and the quantities thereof. ISO 17190, WSP 210 or equivalent proven test methods shall be accepted. The methods used for the analyses shall be described and the names of the laboratories used for analysis shall be stated.

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<sup>6</sup> Regulation on Classification, Labeling and Packaging of Substances and Mixtures:  
<https://www.mevzuat.gov.tr/mevzuat?MevzuatNo=19108&MevzuatTur=7&MevzuatTertip=5>

- (c) The applicant shall provide a declaration from the supplier specifying the quantity of water-soluble extracts in the superabsorbent polymer(s). ISO 17190, WSP 210 or equivalent proven test methods shall be accepted. The methods used for the analyses shall be described and the names of the laboratories performing the analyses shall be indicated.

## **CRITERION 6. Other Materials and Components**

### **Criterion 6.1. Adhesive Materials**

Adhesive materials shall not contain any of the following substances:

- Colophony resins (CAS numbers 8050-09-7, 8052-10-6, 73138-82-6),
- Diisobutyl phthalate (DIBP, CAS number 84-69-5),
- Diisononyl phthalate (DINP, CAS number 28553-12-0),
- Formaldehyde (CAS number 50-00-0).

This requirement shall not apply if those substances are not intentionally added to the material or to the final product, and are present in the adhesive materials in concentrations below 100 ppm (0.010 % by weight).

The maximum limit for the content of formaldehyde generated during adhesive production and measured in the polymer dispersion shall be 250 ppm, measured in newly produced polymer dispersion. Content of free formaldehyde in hardened adhesive (glue) shall not exceed 10 ppm. Hotmelt adhesives shall be exempted from this requirement.

**Assessment and Verification:** The applicant shall provide a declaration from the supplier that the requirements have been fulfilled. SDSs may be used as proof. Test results for formaldehyde shall be provided, with the exception of hotmelt adhesives.

### **Criterion 6.2. Inks and Dyes**

The product and any part of it shall not be dyed. Derogations to this requirement shall apply to:

- Tampon strings, packaging materials and tapes,
- Titanium dioxide in polymers and viscose,
- Dyed materials that are used for a specific purpose and do not come into direct contact with the skin (for example, materials that indicate the level of wetness).

Inks and dyes used shall also comply with Criterion 7 on Excluded or Limited Substances or Mixtures.

**Assessment and Verification:** The applicant shall provide and shall make suppliers to provide a declaration that the requirements have been fulfilled. In case dyes are used, their presence shall be justified by indicating the specific function provided.

### **Criterion 6.3. Fragrances**

- (a) Products marketed as designed and intended for children as well tampons and nursing pads shall be fragrance-free.
- (b) Any ingoing substance or mixture added to the product as a fragrance shall be manufactured and handled following the code of practice of the International Fragrance Association (IFRA). The code can be found on IFRA website: <http://www.ifraorg.org>. The recommendations of the IFRA Standards concerning prohibition, restricted use and specified purity criteria for materials shall be followed by the manufacturer.
- (c) Any fragrance used shall also comply with Criterion 7 on Excluded or Limited Substances or Mixtures regardless of the concentration in the final product.
- (d) Fragrances and ingredients of the fragrance mixtures that are identified as established contact allergens of special concern by the Scientific Committee on Consumer Safety (SCCS) as well as the fragrances whose presence, in accordance with Annex III of the "Cosmetics Regulation<sup>7</sup>" published in the Official Gazette dated 23.05.2005 and numbered 25823 shall not be used. Further the use of nitromusks and polycyclic musks is not allowed.
- (e) The use of fragrances shall be indicated on the product packaging. Further, fragrances and/or ingredients of the fragrance mixtures that are identified as established contact allergens in humans by the Scientific Committee on Consumer Safety (SCCS) and are not restricted by Criterion 6.3 (c) and (d) shall additionally be named.

**Assessment and Verification:** The applicant shall provide a declaration of compliance for all the requirements laid down in points (a) to (e), supported by a declaration of the fragrance manufacturer, if appropriate. The list of fragrances used and visual evidence that information has been added to the packaging shall be also provided, when fragrances are used.

#### **Criterion 6.4. Lotions**

- (a) Lotions shall not be used in feminine care pads, tampons and nursing pads. The use of lotions in other products shall be indicated on the packaging.
- (b) Any lotion used in products other than feminine care pads, tampons and nursing pads shall comply with Criterion 6.3 on fragrances and Criterion 7 on Excluded or Limited Substances or Mixtures regardless of their concentration in the final product.
- (c) The following substances shall not be used: triclosan, parabens, formaldehyde and formaldehyde-releasing chemicals.

**Assessment and Verification:** The applicant shall provide a declaration of compliance supported by a declaration of the lotion manufacturer, if appropriate. Visual evidence that information has been added to the packaging shall be also provided, when lotions are used.

#### **Criterion 6.5. Silikon**

- (a) Where components of the product are treated with silicone, the manufacturer shall ensure that employees are protected from the solvents.

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<sup>7</sup> Cosmetics Regulation:  
<https://www.mevzuat.gov.tr/mevzuat?MevzuatNo=8157&MevzuatTur=7&MevzuatTertip=5>

(b) Neither octamethyl cyclotetrasiloxane D4 (CAS 556-67-2) nor decamethyl cyclopentasiloxane D5 (CAS 541-02-6) shall be present in chemical products used in the silicone treatment of components. This requirement shall not apply where D4 and D5 are not intentionally added to the material or to the final product, and where D4 and D5 are present in the silicone in concentrations below 100 ppm (0.01 % by weight).

***Assessment and Verification:***

- (a) The applicant shall provide information on the method used for the treatment of silicone and documentation attesting that employees are protected.
- (b) The applicant shall provide a declaration from the supplier that this requirement has been fulfilled.

**Criterion 6.6. Nanosilver Particles**

Nanosilver particles shall not be intentionally added to the product or to any homogeneous part or material of it.

***Assessment and Verification:*** The applicant shall provide a declaration and shall make suppliers to provide a declaration that this requirement has been fulfilled.

**CRITERION 7. Excluded or Limited Substances or Mixtures**

**Criterion 7.1. Hazardous Substances and Mixtures**

The Environmental Label may not be awarded if the product or any substance of the product contains substances or mixtures classified with any of the hazard statement specified in Table 4 within the scope of Annex-1 of the "Regulation on Classification, Labeling and Packaging of Substances and Mixtures" published in the Official Gazette dated 11.12.2013 and numbered 28848.

The most recent classification rules shall take precedence over the listed hazard classifications. Applicants shall therefore ensure that any classifications are based on the most recent classification rules.

The hazard statements in table 4 generally refer to substances. However, if information on substances cannot be obtained, the classification rules for mixtures shall apply.

Substances or mixtures which change their properties through processing and thus become no longer bioavailable or undergo chemical modification in a way that removes the previously identified hazard are exempted from Criterion 7.1. This shall include, for instance, modified polymers and monomers or additives, which become covalently bonded within plastics.

Concentration limits for substances or mixtures which may be or have been assigned the hazard statements listed in table 4, meeting the criteria for classification in the hazard classes or categories, the concentration limits specified in the "Regulation on Classification, Labeling and Packaging of Substances and Mixtures" published in the Official Gazette dated 11.12.2013

and numbered 28848. Where specific concentration limits are determined they shall prevail over the generic ones

**Table 4. Hazard Statements**

Hazard Statements
H300 Fatal if swallowed.
H301 Toxic if swallowed.
H304 May be fatal if swallowed and enters airways.
H310 Fatal in contact with skin.
H311 Toxic in contact with skin.
H330 Fatal if inhaled.
H331 Toxic if inhaled.
H340 May cause genetic defects.
H341 Suspected of causing genetic defects.
H350 May cause cancer.
H350i May cause cancer by inhalation.
H351 Suspected of causing cancer.
H360F May damage fertility.
H360D May damage the unborn child.
H360FD May damage fertility. May damage the unborn child.
H360Fd May damage fertility. Suspected of damaging the unborn child.
H360Df May damage the unborn child. Suspected of damaging fertility.
H361f Suspected of damaging fertility.
H361d Suspected of damaging the unborn child.
H361fd Suspected of damaging fertility. Suspected of damaging the unborn child.
H362 May cause harm to breast fed children.
H370 Causes damage to organs.
H371 May cause damage to organ.
H372 Causes damage to organs through prolonged or repeated exposure.
H373 May cause damage to organs through prolonged or repeated exposure.
H400 Very toxic to aquatic life.
H410 Very toxic to aquatic life with long-lasting effects.
H411 Toxic to aquatic life with long-lasting effects.
H412 Harmful to aquatic life with long-lasting effects.
H413 May cause long-lasting effects to aquatic life.
H420 Harms public health and the environment by destroying the ozone layer in the upper atmosphere.
EUH029 Contact with water liberates toxic gas.
EUH031 Contact with acids liberates toxic gas.
EUH032 Contact with acids liberates very toxic gas.
EUH070 Toxic by eye contact.
H317 (Sub-category 1A): May cause allergic skin reaction (trigger concentration $\geq 0.1$ % w/w).
H317 (Sub-category 1B): May cause allergic skin reaction (trigger concentration $\geq 1.0$ % w/w).
H334 May cause allergy or asthma symptoms or breathing difficulties if inhaled.

**Assessment and Verification:** The applicant shall provide the bill of materials of the product, including a list with all articles and homogeneous part of it.

The applicant shall screen the presence of substances and mixtures that may be classified with the hazard statements reported in this criterion. The applicant shall provide a declaration of compliance with this criterion for the product, any article of it or any homogeneous part of it.

Applicants shall select the appropriate forms of verification. The main forms of verification are set out as follows:



- Homogenous parts and any associated treatments or impurities (e.g. superabsorbent polymer layer): SDSs shall be provided for the materials composing that part of product and for substances and mixtures used in the formulation and treatment of the materials remaining in the final part above a cut-off limit of 0.10% w/w unless a lower generic or specific concentration limit applies.
- Chemical recipes used to impart a specific function to the product or to components of the product (e.g. glues and adhesives, dyes): SDSs shall be provided for substances and mixtures used in the assembly of the final product or substances and mixtures applied to components of the product and remaining in the components of the product.

That declaration shall include related documentation, such as declarations of compliance signed by the suppliers, on the non-classification of the substances, mixtures or materials with any of the hazard classes associated to the hazard statements referred in Table 4 are not classified, to the extent that it can be determined by information that meets the requirements listed in Annex-7 of the "Regulation on Registration, Evaluation, Authorization and Restriction of Chemicals<sup>8</sup>" published in the Official Gazette dated 23.06.2017 and numbered 30105.

The information provided shall relate to the forms or physical states of the substances or mixtures as used in the final product.

The following technical information shall be provided to support the declaration of classification or non-classification for each substance:

- (i) For substances that have not been registered under the "Regulation on Registration, Evaluation, Authorization and Restriction of Chemicals" published in the Official Gazette dated 23.06.2017 and numbered 30105 or do not yet have a harmonized classification under the "Regulation on Classification, Labeling and Packaging of Substances and Mixtures" published in the Official Gazette dated 11.12.2013 and numbered 28848: Information meeting the requirements listed in Annex 7 of the "Regulation on Registration, Evaluation, Authorization and Restriction of Chemicals" published in the Official Gazette dated 23.06.2017 and numbered 30105;
- (ii) For substances that have not been registered under the "Regulation on Registration, Evaluation, Authorization and Restriction of Chemicals" published in the Official Gazette dated 23.06.2017 and numbered 30105 and do not meet the requirements for classification under the "Regulation on Classification, Labeling and Packaging of Substances and Mixtures" published in the Official Gazette dated 11.12.2013 and numbered 28848: Information confirming that the substance is not classified based on the registration file of the "Regulation on Registration, Evaluation, Authorization and

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<sup>8</sup> Regulation on Classification, Labeling and Packaging of Substances and Mixtures:  
<https://www.mevzuat.gov.tr/mevzuat?MevzuatNo=23694&MevzuatTur=7&MevzuatTertip=5>

- Restriction of Chemicals" published in the Official Gazette dated 23.06.2017 and numbered 30105;
- (iii) For substances with harmonized classification or self-classified: Where appropriate, SDSs, if these are not suitable or the substance has its classification, information on the hazard classification of the substance in Annex-2 of the "Regulation on Registration, Evaluation, Authorization and Restriction of Chemicals" published in the Official Gazette dated 23.06.2017 and numbered 30105 shall be provided;
  - (iv) In case of mixture: SDSs where appropriate, if these are not suitable, the calculations of the mixture classification according to the rules within the scope of the "Regulation on Classification, Labeling and Packaging of Substances and Mixtures" published in the Official Gazette dated 11.12.2013 and numbered 28848, and information on the hazard classification of the mixture in Annex-2 of the "Regulation on Registration, Evaluation, Authorization and Restriction of Chemicals" published in the Official Gazette dated 23.06.2017 and numbered 30105.

SDSs shall be completed in accordance with the guidance set out in Annex-2 of the "Regulation on Registration, Evaluation, Authorization and Restriction of Chemicals" published in the Official Gazette dated 23.06.2017 and numbered 30105. Incomplete SDSs shall require supplementing with information from declarations by chemical suppliers.

Information on intrinsic properties of substances may be generated by means other than tests. For instance, in accordance with Annex 11 of the "Regulation on Registration, Evaluation, Authorization and Restriction of Chemicals" published in the Official Gazette dated 23.06.2017 and numbered 30105, qualitative or quantitative structure-activity relationship models, in vitro methods, grouping and cross-reading approach can be utilized. The sharing of relevant data across the supply chain is strongly encouraged.

#### **Criterion 7.2. Substances Listed in Article 49 of the Regulation on Registration, Evaluation, Authorization and Restriction of Chemicals**

Substance that are defined as a substance of very high concern in Article 49 of the " Regulation on Registration, Evaluation, Authorization, and Restriction of Chemicals " and are present in mixtures, products, or any homogeneous part of a product at concentrations greater than 0.10% by weight is not exempt from regulation.

**Assessment and Verification:** Reference to the latest list of substances of very high concern shall be made on the date of application. The applicant shall provide a declaration of compliance with Criterion 7.2, together with related documentation, including declarations of compliance signed by the material suppliers and copies of relevant SDSs for substances or mixtures in accordance with Annex 2 of the Regulation on Registration, Evaluation, Authorization and Restriction of Chemicals for substances or mixtures and related documents. Concentration limits shall be indicated in the SDSs.

## CRITERION 8. Material Efficiency in The Manufacturing

The quantity of waste generated during the manufacture and packaging of the products, at the net of the fraction that is reused or converted into useful materials and/or energy, shall not exceed (including the portion converted into reused or usable materials and/or energy through recovery/disposal operations carried out in accordance with the Waste Management Regulation published in the Official Gazette dated 02.04.2015 and numbered 29314):

- 10% by weight of the end products for tampons.
- 5% by weight of the end products for all the other products.

**Assessment and Verification:** The applicant shall provide evidence of the quantity of waste that has not been reused within the manufacturing process or that is not converted into materials and/or energy.

Calculations shall be shown in accordance with TS EN ISO 14025 and the applicant shall present all of the following parameters concerning:

- The weight of product and packaging,
- All the waste streams generated during the manufacture, and
- The respective treatment processing (e.g. recycling, incineration), including the fraction of recovered waste and that disposed of

The net waste shall be calculated as the difference between the amount of waste produced and the amount of waste recovered.

## CRITERION 9. Guidance on The Product Disposal

The producers shall write or indicate through visual symbols on the packaging:

- That the product must not be flushed into toilets,
- How to dispose the product correctly.

**Assessment and Verification:** The applicant shall provide a sample of the packaging.

## CRITERION 10. Fitness for Use and Quality of The Product

The efficiency/quality of the product shall be satisfactory and at the least equivalent of products already on the market. Fitness-for-use shall be tested with respect to the characteristics and parameters reported in Table 5. Performance thresholds shall be matched, where these have been identified.

**Table 5.** Characteristics and Parameters Describing the Fitness for Use of The Product to Be Tested

Characteristic	Testing Practice Required (Performance Threshold)			
	Baby Diapers	Feminine Care Pads	Tampons	Nursing Pads

Technical Tests	T1. Absorption and Leakage Protection	Absorption Rate and Absorption Before Leakage	Syngina method	No method recommended
	T2. Skin Dryness	TEWL, Rewet Method or Corneometric Testing	Not applicable	No method recommended

**Assessment and Verification:** A test report shall be provided for technical tests describing test methods, test results and data used. Testing, whether internal or external (i.e. owned by the organization applying for the Environmental Label or third party testing), must be carried out by laboratories with quality management systems.

Tests shall be conducted for the specific type and size of products applying for the Environmental Label. Nevertheless, if it can be demonstrated that products have the same performance, it can be enough to test only one size or a representative mix of sizes per each product design. Special care shall be taken regarding sampling, transport and storage of the products to guarantee reproducibility.

Information on testing shall be made available to the Ministry, under the respect of confidentiality issues. Test results shall be clearly explained and presented in language, units and symbols that are understandable to the data user. The following elements shall be specified: place and date of the tests; criteria used to select the products tested and their representativeness; selected testing characteristics and, if applicable, the reasons why some were not included; test methods used and their limitations if any. Clear guidelines on the use of test results shall be provided.

Additional guidelines for user tests:

- Test methods shall be based as much as possible on product-relevant, reproducible and rigorous methods.
- A minimum of five samples shall be tested. Average results shall be reported together with indication of the standard deviation.

The test reports shall specify the weight, dimensions and design characteristics of the product tested in accordance with Criterion 1.

### **CRITERION 11. Information Appearing on the Environmental Label**

The following information shall be placed on the product along with the Environmental Label:

The environmental label shall be placed on the product packaging in dimensions of 2\*2 cm. Under the label, document number in 6 points and "The use of the environmental label in this product has been approved by the Ministry of Environment, Urbanization and Climate Change in accordance with the Environmental Label Regulation published in the Official Gazette dated 19.10.2018 and numbered 30570 due to its environmental performance." statement shall be legible and clearly visible.

The applicant may choose to include an optional text box on the label that contains the following text:

- Reduced impacts from consumption of resources
- Restricted use of hazardous substances
- Performance and quality tests satisfied

***Assessment and Verification:*** The applicant shall provide a sample of the product label or the design of the packaging on which the Turkish Environmental Label is placed, together with a signed declaration of conformity. The Environmental Label shall be placed on the packaging of products of different sizes, in the dimensions determined by the Ministry of Environment, Urbanization and Climate Change. Approval of the Ministry is required for it to take place in different sizes.