

Eco Mark Product Category No. 114

“Paper Packaging Materials Version Version2.11” Certification Criteria

- Applicable Scope-

Cushioning packaging materials, paper cords and paper trays (cardboard products and paper boxes excluded).

Established: February 20, 2003

Last revised: April 1, 2025

Expiration date: June 30, 2031

Japan Environment Association

Eco Mark Office

NOTE: This document is a translation of the criteria written in Japanese. In the event of dispute, the original document should be taken as authoritative.

Eco Mark Product Category No.114

“Paper Packaging Materials Version Version2.11” Certification Criteria

Japan Environment Association

Eco Mark Office

1. Purpose of Establishing Criteria

Packaging materials are used in a variety of fields. Among these, cushioning packaging materials use a high percentage of recycled paper and effectively recycle magazine paper, which is currently not utilized much. Therefore, this product category plays a significant role to facilitate smooth recycling of resources.

In recent years, interests in chemical substances, etc. have grown stronger than before. In particular, with the enforcement of the Law Concerning Reporting, etc. of Release to the Environment of Specific Chemical Substances and Promoting Improvements in Their Management (PRTR law), information on chemical substances has been accumulating, resulting in the need to clearly set down the methods of handling chemical substances as Eco Mark certification criteria for packaging paper. As certain packaging materials contain organic solvents, the reduction of their content is important for reducing environmental impact on the atmosphere as well as for effective use of resources. In addition, packaging materials have diverse impacts on the environment, taking into account energy consumption at the time of production and waste water disposal. Accordingly, wider use of packaging materials with eco-friendliness in terms of chemical substances and other various aspects in addition to the existing focus, the use of waste paper, will significantly contribute to the conservation of the environment.

As with the Product Category No.113 “Packaging Paper”, this product category aims to promote recycling by the dissemination of packaging materials using waste paper, and also covers the management of chemical substances as described above.

2. Applicable Scope

Cushioning packaging materials, paper cords and paper trays (cardboard products and paper boxes excluded).

3. Terminology

Waste paper:	Collected post-consumer waste paper and pre-consumer waste paper.
--------------	---

Post-consumer waste paper	Used paper generated from stores, offices and households and containing those to be used as a raw material for paper by paper manufacturers (including those that are shipped as articles and returned after passing through the distribution chain).
Pre-consumer waste paper	<p>Paper generated from the working process following the paper making process of base paper, and used as a raw material by paper manufacturers.</p> <p>However, the following shall not be treated as waste paper: paper which is generated if processing is performed in a factory or workplace that uses paper as a raw material, such as paper processing factories, paper products factories, or printing and bookbinding plants of a paper manufacturer (including an associated company such as a subsidiary, affiliated company, etc. of said paper manufacturer) or if said paper manufacturer has other contractor to conduct processing through commissioning of the product before its shipment, and which is used by said paper manufacturer as a raw material for paper without being shipped as articles. (If paper leaves said paper manufacturer, etc. and is distributed by way of a third party, it shall be treated as waste paper, excluding a case in which waste sheet is intentionally treated as waste paper.)</p>
Waste paper pulp	Pulp obtained by deflaking or deflaking/deinking waste paper, paper board, or cutting scraps of paper or paper board.
Percentage of waste paper pulp:	Weight percentage of waste pulp in pulp contained in product. Expressed by $(\text{waste paper pulp}) / (\text{virgin pulp} + \text{waste paper pulp}) \times 100 (\%)$. However, the weight of the pulp is measured under the condition of containing 10% moisture. In addition, waste sheets shall not be included in the denominator and numerator, respectively, of the calculating formula of waste paper pulp combination rate..
Waste sheets	<p>Waste paper shall fall under any of the following:</p> <ul style="list-style-type: none"> - Those generated in the paper making process, and directly returned to the paper making process to be used as a raw

	<p>material (so-called “circulating waste sheet”. Wet broke and dry broke)</p> <ul style="list-style-type: none"> - Those stored in a paper making factory or operator and used as a raw material (so-called “stocked waste sheets”) - Those stipulated by the conditional clause in the definition of the pre-consumer waste paper described above.
Paper Manufacturer	<p>“PAPER (142)” listed in the Medium Category of the Japan Standard Industrial Classification (The Ministry of Internal Affairs and Communications Public Notice No. 175 of March 23, 2009), and “Paper (1421)”, “Paperboard (1422)”, “Machine-made Japanese style paper (1423)” and “Hand-made Japanese style paper (1424)” in the Small Category.</p>
Subsidiary, affiliate company, and associated company	<p>Those defined in each section of Article 8 of “Ordinance on Terminology, Forms and Preparation Methods of Financial Statements, etc.” based on the stipulation of Article 193 of the Financial Instruments and Exchange Act (Act No. 25 of 1948).</p>
Fluorescent whitening agent:	<p>An agent that fluoresces under the sun light and visually enhances the whiteness of paper.</p>
Prohibited materials	<p>Those materials defined as prohibited materials in the “Waste paper Quality Standard” established by the Paper Recycling Promotion Center (Incorporated Foundation)</p>

4. Certification Criteria and Certification Procedure

*Attachments and certificates shall be submitted to indicate compliance to criteria.

4-1. Environmental Criteria and Certification Procedure

(1) For packaging cushioning products, the percentage of waste paper in the pulp mixture shall be 100%.

As for paper cords, the percentage of waste paper in the pulp mixture shall be 100%. For paper trays, the percentage of waste paper in the pulp mixture shall be at least 90%. However, the volume of printing ink, plastic coating, adhesive and agglutinant are eliminated from the total weight of the products.

[Certification Procedure]

Certificate for the percentage of waste paper pulp issued by a paper manufacturer shall be submitted. The certificates shall include the items below.

- 1) Thorough management at a manufacturing plant (by specifying the percentage of waste paper pulp of Eco Mark products in a written technical standard (quality standard), etc.)
- 2) Clear indication of names of those who are in charge of manufacturing or quality control of Eco Mark products at a manufacturing plant (hereinafter referred to as a person in charge of Eco Mark products)

In addition, a material showing methods for managing/checking the percentage of waste paper pulp in a factory, such as a document related to “Checklist for Verification System of Percentage of Waste Paper Pulp” (April 2, 2008, Japan Paper Association) or result of internal audit according thereto on the percentage of waste paper pulp by a paper manufacturer shall be submitted. However, if Eco Mark certified paper is used, statement of “Product Brand Name” and “Certification number.” of the paper in an attached certificate could be the substitute.

- (2) In manufacturing the applied product, related environmental laws and regulations and pollution control agreement (hereinafter referred to as the “Environmental Laws, etc.”) must be followed with respect to air pollution, water contamination, noise, offensive odor, and emission of hazardous substances in the area where the plant performing the final manufacturing process is located.

In addition, the state of compliance with the Environmental Laws, etc. for the past five years from the date of application (whether there is any violation) must be reported. If there is any violation, proper remedies and preventive measures shall have been already taken, and the related Environmental Laws, etc. must thereafter be followed appropriately.

[Certification Procedure]

With respect to the compliance with the Environmental Laws, etc. in the area where the plant performing the final manufacturing process is located, a certificate issued by the representative of the business of manufacturing the applied product or the relevant plant manager (entry or attachment of a list of names of the Environmental Laws, etc.) must be submitted.

In addition, the applicants shall report whether there is any violation in the past five years, including a violation subject to administrative punishment or

administrative guidance, and if there is, the following documents in a and b must be submitted:

- a. With respect to the fact of violation, guidance documents from administrative agencies (including order of correction and warning) and copies of written answers (including those reporting causes and results of correction) to such documents (clearly indicating a series of communication);
- b. Following materials (copies of recording documents, etc.) concerning the management system for compliance with the Environmental Laws, etc. in 1)-5):
 - 1) List of the Environmental Laws, etc. related to the area where the plant is located;
 - 2) Implementation system (organizational chart with roles, etc.);
 - 3) Bylaws stipulating retention of recording documents;
 - 4) Recurrence prevention measures (future preventive measures);
 - 5) State of implementation based on recurrence prevention measures (result of checking of the state of compliance, including the result of onsite inspection).

In addition, if the PRTR law is applicable to a plant manufacturing products and substances covered thereby (Class 1 designated chemical substance) are used more than the prescribed amount the reporting responsibility of which is defined by the law, a certificate stating the amount of emission and transfer of each substance to be issued by Manager of the plant manufacturing the product shall be submitted.

(3) When virgin pulp (excluding virgin pulp manufactured by recycled resources such as thinned wood, lower grade timber, and mill ends, etc. generated from plywood and sawmills) is used, the timber used for material wood must be harvested in legal manner consistent with procedures in the forest laws of timber producing countries.

[Certification Procedure]

A certificate shall be submitted to prove that the timber whose legality has been verified* in accordance with “Guideline for Verification on Legality and Sustainability of Wood and Wood Products” of Forestry Agency has been in custody to be separated by the applicant or the paper manufacturer and is supplied to the applied products. At the same time, the applicant or the paper manufacturer who issues the above certificate shall submit any of the following

certificates:

- 1) Certificate that the applicant or the paper manufacturer has been assessed and authenticated by the CoC (Chain of Custody) Certification System;
- 2) Certificate of the authorized company (that guarantees the association member's adequate way of supplying wood and wood products verified with legality, etc.); and
- 3) Code of management practice which stipulates the way of custody to manage wood and wood products verified with legality (the method in the case that the timber verified with legality only is handled. The same applies to hereunder), retention of certificates for a predetermined period, etc.

In the event that Item 2) or 3) above is chosen and the certificate is submitted, the applicant or the paper manufacturer who issues the above-mentioned certificates shall publicly announce through its Web site the code of management practice prescribed by the association concerned in the case of Item 2) and shall prescribe and publicly announce through its Web site the code of management practice concerning the scheme to assess and guarantee the system for separative management, document management for retention of certificates for a predetermined period, etc. in the case of Item 3).

*Confirm the certificate issued by the related company closest in commercial process, which at least verifies that wood and wood products they supply are with legality and under separative custody management

- (4) No chlorine gas shall be used in the pulp bleaching process. (However, this requirement shall not be applicable until June 30, 2005.)

[Certification Procedure]

Certificates issued by the paper manufacturer shall be submitted.

- (5) Azo colorants (dyes and pigments) which may generate one or more amines of Table 1 in the decomposition of one or more azo radicals by reduction shall not be used. If used, one or more amines listed in Table 1 shall not be detected in 30 mg per kg or more of the product.

[Certification Procedure]

Certificates issued by the paper manufacturer indicating whether the concerned substances are used shall be submitted. If used, one of the three

certificates 1) to 3) below issued by the paper manufacturer to certify that no amines in Table 1 exceeding 30 mg per kg in the product have been detected shall be submitted.

1) Certificates specifying that no azo colorants exceeding 30 mg per kg of the product are contained.

2) Certificates specifying that no amines in Table 1 have been detected exceeding 30 mg per kg of the product after considering every such risk in theory.

3) Certificates specifying that no amines in Table 1 exceeding 30 mg per kg of the product have been detected by an analysis method prescribed in the list of public testing methods based on Article 35 of the German law on foods and daily supplies.

(6) The product shall not contain fluorescent whitening agents as prescribed constituents.

[Certification Procedure]

Certificates issued by the paper manufacturer indicating whether fluorescent whitening agents are used shall be submitted.

(7) The product shall not use materials such as plastic coating, which impedes recycling and reuse after consumption. This requirement is not applicable to coatings for paper trays used to avoid contact of the recycled paper with food in accordance with the Food Sanitation Law. Further, consideration shall be given to reducing the environmental burden when the product is disposed of.

[Certification Procedure]

Details shall be indicated in attached certificates.

(8) The product packaging shall be designed to facilitate recycling and shall impart a reduced environmental burden when incinerated.

In addition, the plastic materials for packaging of products shall not contain polymers including halogens and organic halogen compounds as prescribed component elements.

[Certification Procedure]

Details shall be indicated in attached certificates.

4-2. Quality Criteria and Certification Procedure

(9) As for cushioning packaging materials, paper cords and paper trays, the quality and safety of the product shall conform to the applicable provisions, or quality control at the production process shall be maintained at satisfactory level.

As for paper trays and cushioning packaging materials to be used for food, the products shall conform to the “codes and standards for food, additives and the others” in Food Sanitation Law and the measures to ensure the safety based on “Guidelines on the use of recycled paper in food apparatus and containers and packaging” of Ministry of Health, Labour and Welfare (Shokuan, 0427 No.7, April 27 2012), shall be taken.

[Certification Procedure]

Test results based on the JIS quality criteria (including size) or a copy of the document certifying that the plant is JIS certified shall be submitted. In addition, for paper trays and cushioning packaging materials to be used for food, the written document shall be submitted which shows the ensuring the safety on the basis of “Guidelines on the use of recycled paper in food apparatus and containers and packaging” of Ministry of Health, Labour and Welfare (Shokuan, 0427 No.7, April 27 2012),

5. Considerations

In the process of manufacturing products, it is desirable to consider the following items, although they are not requirements for certification. The response to each item shall be indicated in the Attached Certificate

(1) Quantitative environmental information on greenhouse gas emissions throughout the life cycle of the applied product, from the procurement of the raw materials to the disposal and recycling, shall be disclosed, which is calculated by converting into carbon dioxide equivalents based on the global warming potential (when applying for multiple types at once, calculation by a representative type is acceptable). It shall be possible to explain that the quantitative environmental information has been calculated in accordance with the Carbon Footprint (ISO 14067), Life Cycle Assessment (ISO 14040 and ISO 14044), or “Carbon Footprint Guidelines” prepared by the Ministry of Economy, Trade and Industry and the Ministry of the Environment. The medium for disclosing the quantitative environmental information (URL of the calculation report, etc.) shall be disclosed as part of product

information on the Eco Mark website.

6. Product Classification, Indication and Others

- (1) Product classification shall be by product type as cushioning packaging materials, paper cords and paper trays and also by brand name. Classification by size is not performed.
- (2) In principle, Eco Mark shown as below shall be indicated on the product. Regarding licensee of Eco Mark Utilization Contract who already own Eco Mark products, the indication of the logo and certification number that have been used is also acceptable.



(Note for the indication)

- * For indicating the logo, Eco Mark certification number (eight-digit number) or the name of the licensee using the logo shall be appeared.
- * Such expression as “Eco Mark product” can be used following the 2.(2) of the Guide to Eco Mark Usage.
“Eco Mark product”, “#Eco Mark”, “www.ecomark.jp”, “Eco Mark Certificate”
- * In accordance with “Environmental Labeling Guidelines” of the Ministry of the Environment of Japan, etc., the environmental claims of certified products may be indicated in association with Eco Mark.
(<https://www.env.go.jp/policy/hozen/green/ecolabel/guideline/>)
- * The Guide to Eco Mark Usage shall be followed for any cases not listed above.
(<https://www.ecomark.jp/office/guideline/guide/>)

Established: July 1, 2004 (Version2.0)

Revised: Nov. 21, 2004 (Version2.1)

Revised: Oct. 19, 2006 (Version2.2)

Revised: April 1, 2007 (Version2.3)

Revised: July 1, 2008 (Version2.4)

Revised: August 21, 2008 (Version2.5)

Revised: May 1, 2009 (Version2.6)

Revised: May 1, 2011 (Version2.7)

Revised: July 5, 2012 (Version2.8)

Revised: April 1, 2014 (Version2.9)

Revised: June 1, 2015 (Version2.10)

Extension of Expiration: March 1, 2020

Extension of Expiration: March 10, 2025

Revised: April 1, 2025 (Version2.11)

Expiration date: June 30, 2031

The Certification Criteria for the Product Category will be revised when necessary.

Attached Table 1. Amines that shall not be generated as a result of the decomposition of azo radicals

Chemical substance		CAS RN.
1	4-aminodiphenyl	92-67-1
2	benzidine	92-87-5
3	4-chloro-0-toluidine	95-69-2
4	2-naphthylamine	91-59-8
5	0-aminoazotoluene	97-56-3
6	2-amino-4-nitrotoluene	99-55-8
7	p-chloroaniline	106-47-8
8	2,4-diaminoanisole	615-05-4
9	4,4'diaminophenylmethane	101-77-9
10	3,3'dichlorobenzidine	91-94-1
11	3,3'dimethoxybenzidine	119-90-4
12	3,3'dimethylbenzidine	119-93-7
13	3,3'dimethyl-4,4'diaminodiphenylmethane	838-88-0
14	p-cresidine	120-71-8
15	4,4'methylene-bis-(2-chloroaniline)	101-14-4
16	4,4'oxydianiline	101-80-4
17	4,4'thiodianiline	139-65-1
18	0-toluidine	95-53-4
19	2,4-toluilenediamine	95-80-7
20	2,4,5-trimethylaniline	137-17-7
21	0-anisidine	90-04-0
22	4-Aminoazobenzene	60-09-3