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Essity response to European Commission consultation on the Green Claims proposal

Essity aspires to be the undisputed global leader in hygiene and health. With headquarters in Stockholm, Sweden, sales are conducted in approximately 150 countries under the leading global brands TENA and Tork, and under other strong brands, such as Actimove, JOBST, Knix, Leukoplast, Libero, Libresse, Lotus, Nosotras, Saba, Tempo, TOM Organic, Vinda and Zewa. Essity breaks barriers to well-being and contributes to a healthy, sustainable, and circular society.

We welcome the European Green Deal and we have set an ambitious target to reach net zero by 2050 latest. In everything we do, we have the needs of our consumers, patients, care givers, and customers in mind and at heart. We are committed to social and environmental sustainability and constantly challenge ourselves to evolve. We develop, supply, and sell products and solutions that enable superior hygiene and health outcomes and experiences at home as well as away from home. We do this by supporting the effectiveness and efficiency of hygiene and health routines as well as by preventing, treating, and monitoring health conditions.

Essity agrees with the European Commission (EC) that, at present, many product related claims are not properly substantiated and mislead the consumer in making more sustainable choices. If claims about environmental performance used on the internal market would be based on Life Cycle Assessments (LCA), greenwashing would effectively be countered. Essity has a long tradition of conducting LCAs and it helps Essity to monitor the environmental performance of its innovations, and to constantly improve and communicate our efforts with consumers. This includes resource efficiency from suppliers and from our own production, superior materials, as well as smarter product design for better post-consumer use.

Essity is working with industry associations CEPI, AIM and EDANA when it comes to the EC:s proposal on Green Claims. We therefore refer to their responses in the consultation and would only like to underline the following points:

- In order for any ex-ante assessment and third party verification process to promote the green transition and not cause an unproportionate administrative and financial burden on Member States and operators or unnecessary delays, specific/individual claims should not be subject to ex-ante third party verification.
- We are supporting the EC's proposal not to limit the use of substantiating claims to a specific method, e.g., the Product Environmental Footprint (PEF) method.
- We welcome the need of harmonized consumer information and the possibility to use hybrid solutions e.g., combining on-pack information with digital information.

Essity develops its business model to help consumers make more sustainable choices. Our products and services will be designed to promote sustainable consumption and behaviors, where everything is used, and less is wasted. The initiatives following the Circular Economy Action Plan must take into account the long-term socio-economic benefits of products and services and specifically for the hygiene, personal health and care sectors, since they have an essential role in preventing diseases and infections as well as ensuring well-being for European citizens; allowing high-level hygiene everywhere in the EU; and fostering the health, independence and well-being of people. This requires embracing a life-cycle approach, where environmental performance is assessed throughout the entire life cycle and where the role and the functionality of packaging and products are considered. Learning from the on-going implementation of the Single Use Plastics Directive and, previously, the Medical Device Directive, any implementation guidance needs to be clear and harmonized during the implementation process.

We look forward to continued dialogue and to engage together on this common challenge and the opportunities in the future.

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Workable ex-ante approval to raise the bar on green claims

We are currently working on how the ex-ante approval can be improved to become a real tool to combat green washing without causing unproportionate burden on Member States and operators. From an Essity perspective we want to continue to:

- use third party approved ecolabels – e.g. EU ecolabel, Nordic Swan, Blue Angel, FSC® and PEFC™
- produce credible and trustworthy evidence about any product improvement by using life cycle assessments following international standards (ISO 14040/44 on LCA, or EU PEF)
- perform third party reviews of the LCA studies
- be transparent when it comes to ingredients in our products, how they have been produced and how our claims have been substantiated
- substantiate our claims and welcome that the EC's proposal allows for doing so through digital means since there are limitations on how much you can explain on pack.

Having said that, we do not agree that claims approvals for every single claim made must be verified and certified by a national third party conformity assessment body before being made public. This would create an unnecessary administrative and financial burden and also risk delaying product launches of essential products with improved environmental performance, as the time schedule is very tight from start of product to actual launch and the artwork on packaging has strict deadlines.

We would therefore advocate for:

- High level ex-ante approvals, i.e., not on individual claims but on the method used when working with handling claims according to international standards (ISO 14020-series)
- Clear timeframe for approvals which should not exceed 30 days.
- Proportionate administrative burden both for Member states and companies and a reasonable financial burden for companies.

A concrete proposal of what this could look like is currently being shaped and will be feed into the co-decision legislative process.

Substantiating claims through LCA-methods

Essity welcomes that the EC is not limiting the use of LCAs to the PEF method when assessing the environmental impact of products and services. We have a long tradition of conducting LCAs.ⁱ Essity recognizes that PEF is an important tool and we have been contributing during the phase of testing and developing the method. However, the PEF methodology needs to be further developed to be more user friendly for companies. Its methodology and databases still need further development, and we are eager to be involved in and contribute to this upcoming work.

Harmonized consumer information

When it comes to the empowerment of consumers to play their part in the Circular Economy, reliable, clear, understandable, and relevant information about the sustainability features of a product, such as environmental aspects, proper waste disposal, anti-littering, and recycling, is key. Studies confirm that EU consumers have difficulties to understand which products are truly decreasing the environmental impact. Harmonizing information requirements at EU level is key and benefits both businesses and consumers, and upcoming obligations in different Member States.

Essity welcomes the EC's proposal to have hybrid solutions for consumer information, combining on-pack with digital information. Health and safety information, capturing for example the ingredients list of consumer products as well as user instructions for safe and correct use, are in most cases essential and should therefore be directly accessible to all consumers. In addition to aspects lifted previously, see below other relevant information to have in a hybrid solution.

It is important that:

- On-pack labelling or marking requirements should be proportionate and should not come at the expense of brand and product information that companies need to communicate (i.e., brand recognition, conditions of use and own good practice).
- Information through digital means is seen as an opportunity for consumer empowerment in Europe's digital age.

ⁱ We managed the following using LCAs:

- We have reduced the carbon footprint of our TENA pants by a third since 2008. We optimized material selection to reduce waste based on the needs of the consumer whilst minimizing the risk for leakage.
- A recently performed LCA of the Tork Coreless Bath Tissue has shown an average of 11% reduction in the product's carbon footprint, compared to conventional toilet paper. It also generates 86% less packaging waste. Additionally, Tork Xpressnap reduces napkin consumption by at least 25% compared to traditional use of napkins.
- We have reduced the climate impact of Libero diapers by up to 25% since 2008 for the whole life cycle.
- Our packaging strategy includes innovating for increased circularity while simultaneously reducing existing greenhouse gas emissions. In 2022, Essity's packaging for hygiene and health products contained on average 80% renewable or recycled material. By 2025, we aim to achieve 100% recyclability, 85% renewable or recycled materials in our packaging, of which 25% recycled content in plastic packaging.