

Questions from the webinar (24/9-2026)

Substrates

1. Is paperboard for packaging at rigid substrate?

Answer: The O7 requirement refers to ridged substrates used for *signage, display and retail point of sale/purchase (PSO/POP)* – not used for packaging. This is maybe something NSE should look into/adjust the requirement after the consultation.

Definition of non-flexible printing substrates (rigid substrates):

- Non-flexible, or rigid, substrates are stiff materials that cannot bend or deform without breaking or permanently damaging the material. Common materials are paper-/fiber boards, wood-based panels, plastic boards (PE, PC, PP and PET), foam boards, metal panels and glass panels.

Definition of flexible printing substrates:

- Flexible substrates are thin, pliable materials that can bend, roll, twist, or conform to surfaces without breaking. Common materials are paper plastic films, laminates, foils, textiles/fabrics and rubber.

2. How to calculate O6 share of Ecolabelled/inspected paper? Per printing technology or for total consumption of paper?

Answer: The O6 requirement should be calculated as the printing company's total annual consumption of paper, not per printing technology.

Energy:

3. Is this the energy used during printing a certain job or the whole electricity consumption per day/monthly/year divided by the weight of substrates?

Answer: The applicant shall report the printing company's total annual energy consumption per tonne of purchased substrate. So, the consumption of all types of substrates must be reported in tonnes.

4. I wonder if there is a difference made in the requirements depending on whether you own or rent your warehouse?

Answer: No, the requirement applies to all printing companies regardless of whether you own the building yourself or rent it. Examples and guides on how to calculate the energy requirement are given in appendix 5 in the draft criteria.

5. Could a company choose to certify only a defined digital printing operation, while excluding parts of its production that use substrates which do not comply with O7? If so, how would Swan expect companies to handle shared infrastructure such as energy consumption, production facilities, workflows, storage and administration when the certified and non-certified activities are located in the same facility?

Answer: Chapter 3 in the criteria "*What can carry the Nordic Swan Ecolabel*", clearly describes what is included in the criteria (printing methods/technology and types of printed/converted matter) and what is not included in the criteria. This means that a printing company can't choose for them self which substrates to include in O7.

The O7 requirements only apply if the consumption of rigid, non-flexible materials account for more than 5% of the printing company's total annual consumption of substrates.

If a printing company also manufactures printed products that are explicitly excluded from the criteria, such as printing on clothing or furnishing fabrics, the energy consumption associated with these activities must not be included in the calculation. Where separate energy meters are not used, the applicant must allocate energy consumption and ensure that only the energy attributable to the printing service covered by the criteria is included.