



Swan Labelling of Writing Instruments

Version 3.0 •



Nordic Ecolabelling

In November 1989, the Nordic Council of Ministers adopted a measure to instrument an official voluntary ecolabelling scheme, the Swan. The organizations/companies listed below administer the Swan ecolabelling schemes on assignment from their national governments.

For further information, please visit the respective Web sites:

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Quotations may be made provided that Nordic Ecolabelling is stated as the source.

Swan Labelling of Writing Instruments

057/3.0, June 2008

Vad är ett Svanenmärkt Skrivredskap?Error! Bookmark not defined.

Varför välja Svanenmärkning? Error! Bookmark not defined.

Vad kan Svanenmärkas? Error! Bookmark not defined.

Hur söker man? Error! Bookmark not defined.

Vad krävs för att bli Svanenmärkt? Error! Bookmark not defined.

1 **Produktkrav**
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2 **Miljökrav**
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3 **Kvalitets- och miljöledningskrav**
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Marknadsföring Error! Bookmark not defined.

Svanenmärkets utformning Error! Bookmark not defined.

Efterkontroll Error! Bookmark not defined.

Hur länge gäller licensen? Error! Bookmark not defined.

Nya kriterier Error! Bookmark not defined.

Appendices

- 1 Marketing of Swan-labelled writing instruments
- 2 Analysis and test laboratories
- 3 Chemicals prohibited by R4-R7
- 4 Guidelines for forest certification

What is a Swan-labelled writing instrument?

Swan-labelled pens and crayons contain minimal amounts of dangerous chemicals. Another requirement is that pens that use ink must be refillable with new ink cartridges to reduce waste.

More and more companies have policies to purchase green products, thus increasing the demand for Swan-labelled products. Manufacturers of Swan-labelled writing instruments have a competitive edge and can demonstrate simply that their products fulfil stringent environmental requirements.

Why choose the Swan label?

- The manufacturer and importer may use the Swan trademark for marketing. The Swan label is a very well-known and well-reputed trademark in the Nordic region.
- The Swan label is a cost-effective and simple way of communicating environmental work and commitment to customers and suppliers.
- Environmental issues are complex. It can take a long time to gain an understanding of a specific area. Swan labelling can be seen as an aid in this work.
- The Swan label not only covers environmental issues but also quality requirements, since the environment and quality often go hand in hand. This means that a Swan licence can also be seen as a mark of quality.

What can carry the Swan label?

The product group covers ballpoint pens, pencils, mechanical pencils, overhead pens, whiteboard markers, permanent markers, felt-tip pens and crayons.

Nordic Ecolabelling is willing to extend the product group if desired by an applicant following the environmental assessment of the product in question. Contact Nordic Ecolabelling for more information (see page 2 for addresses).




These requirements apply to the product, refill and packaging.

How to apply

Each requirement is marked with the letter R (requirement) and a number. All requirements must be fulfilled for the award of a licence.

Icons in the text

The text describes how the applicant shall demonstrate fulfilment of each requirement. There are also icons in the text to make this clearer. These icons are:

-  Enclose.
-  Requirement checked on site.
-  Submit procedure in environmental and quality management system.

Application

The application shall be sent to Nordic Ecolabelling in the country in which the writing instrument is sold/the applicant carries on activities. See page 2 for addresses. The documents required for application are an application form and documentation demonstrating fulfilment of the requirements (specified in the criteria).

Documentation from suppliers can be sent directly to Nordic Ecolabelling.

The appendices may be used as a documentation aid when applying for a license but are not compulsory. More information is provided in the appendices for Swan-labelled writing instruments.

Further information and assistance regarding application may be available. Visit the Web site of the national ecolabelling body for more information.

Sales in other Nordic countries

Registering a licence in another Nordic country allows the Swan label to be used on a larger market. The following must be submitted to Nordic Ecolabelling:

- Registration form for sales in the country in question.
- Documentation demonstrating the fulfilment of national regulations.

Registration is free of charge but an annual fee shall be paid in accordance with the national regulations.

On-site inspection

During the application process, Nordic Ecolabelling normally performs an on-site inspection to ensure adherence to the requirements. For this inspection, data used for calculations, original copies of submitted certificates, test records, purchase statistics, and similar documents that support the application must be available for examination. Travel costs (flights, transfers and possible hotel accommodation) for inspections outside the Nordic region will be charged to the applicant.

Costs

An application fee is charged to companies applying for a licence. There is an additional annual fee based on the turnover of the writing instruments carrying the Swan label.

Enquiries

Please contact Nordic Ecolabelling if you have any queries or require further information. See page 2 for addresses.

What are the requirements of Swan labelling?

To be awarded a Swan licence:

- All pertinent requirements regarding the product and manufacturer must be fulfilled.
- Nordic Ecolabelling has, if necessary, performed an on-site inspection of the manufacturing facilities, test laboratory and development department

1 Product requirements

R1 Description of the product

Describe the product and how it fulfils the definition of what can carry the Swan label.

The type designation of the refills must also be specified in the application and is stated on the licence.

Product data sheet.

R2 Refill

The applicant must offer refill cartridges for Swan-labelled ballpoint pens, overhead pens, whiteboard markers and permanent markers.

The user must be able to change the refill without the use of special tools.

Refill cartridges must contain the same amount or more ink than original cartridges.

Declaration from the applicant that the requirement is fulfilled. See appendices for assistance.

R3 Child safety

Writing instruments that are designed and intended for use by children must fulfil regulatory requirements regarding child safety and fulfil the requirements for CE-labelling, standard EN-71.

- Declaration from the applicant that the requirement is fulfilled. See appendices for assistance.

2 Environmental requirements

Chemicals

The requirements on inks, pigments and pencil leads apply to all constituent substances.

The term constituent substance refers to all substances in the ink, pigment or pencil lead, including additives (such as preservatives and stabilisers) but does not include impurities from primary production. Impurities are defined as residual products from primary production that can be found in the ink, pigment or pencil lead in concentrations <0.01%. Substances that are added intentionally to a raw material are not considered as impurities irrespective of the concentration.

R4 Ink for ballpoint pens

Ink and constituent substances must not be classified according to Table 1 and 2 in Appendix 3.

The ink must not contain antimony, arsenic, barium, cadmium, mercury, selenium, lead and/or hexavalent chrome.

Volatile organic solvents (vapour pressure >0.01kPa at 20°C) must not be a constituent of the ink.

The ink must not contain aromatic or halogenated hydrocarbons. An exception is made for aromatic hydrocarbons that are used as a denaturant in alcohol and organic pigments.

The ink must not contain preservatives that are bioaccumulating. A preservative is not considered bioaccumulation if BCF<100 or logKow<3. If both these values are available, the BCF value shall be submitted to Nordic Ecolabelling.

- Declaration from the manufacturer of the ink and manufacturer of additives that the requirement is fulfilled.

Documentation regarding preservatives, if applicable.

MSDS/product sheet complying with Directive 2001/58/EC that is no more than three years old. See appendices for assistance.

The exact recipe for the ink shall be submitted to Nordic Ecolabelling. The recipe shall specify for each substance: chemical name; trade name; CAS number; quantity (incl. water content); quantity in final product (specify also the total water content of the product); function; and health and environmental classification in accordance with Directives 67/548/EU and 1999/45/EU with amendments.

R5 Ink for overhead, whiteboard, felt-tip and permanent pens and markers

Ink and constituent substances must not be classified according to Table 1 and 2 in Appendix 3.

The ink must not contain antimony, arsenic, barium, cadmium, mercury, selenium, lead and/or hexavalent chrome.

The ink must not contain aromatic or halogenated hydrocarbons. An exception is made for aromatic hydrocarbons that are used as a denaturant in alcohol and organic pigments.

If volatile organic solvents (vapour pressure >0.01kPa at 20°C) are a constituent of the ink, only the following solvents are permitted:

- ethanol (CAS 64-17-5)
- 1-propanol (CAS 71-23-8)
- Isopropyl alcohol (CAS 67-63-0)
- 1-methoxy 2-propanol (CAS 107-98-2)

Other volatile organic solvents (vapour pressure >0.01kPa at 20°C) are not permitted.

The ink must not contain preservatives that are bioaccumulating. A preservative is not considered bioaccumulation if $BCF < 100$ or $\log K_{ow} < 3$. If both these values are available, the BCF value shall be submitted to Nordic Ecolabelling.

☒ Declaration from the manufacturer of the ink and manufacturer of additives that the requirement is fulfilled.

Documentation regarding preservatives, if applicable.

MSDS/product sheet complying with Directive 2001/58/EC that is no more than three years old. See appendices for assistance.

The exact recipe for the ink shall be submitted to Nordic Ecolabelling. The recipe shall specify for each substance: chemical name; trade name; CAS number; quantity (incl. water content); quantity in final product (specify also the total water content of the product); function; and health and environmental classification in accordance with Directives 67/548/EU and 1999/45/EU with amendments.

R6 Leads for pencils and colour pencils

Pencil leads and constituent substances must not be classified according to Table 1 and 2 in Appendix 3.

The pencil lead must not contain antimony, arsenic, barium, cadmium, mercury, selenium, lead and/or hexavalent chrome.

The pencil lead must not contain preservatives that are bioaccumulating. A preservative is not considered bioaccumulation if $BCF < 100$ or $\log K_{ow} < 3$. If both these values are available, the BCF value shall be submitted to Nordic Ecolabelling.

☒ Declaration from the manufacturer of the pencil lead and manufacturer of additives that the requirement is fulfilled.

Documentation regarding preservatives, if applicable.

MSDS/product sheet complying with Directive 2001/58/EC that is no more than three years old. See appendices for assistance.

The exact recipe for the pencil lead shall be submitted to Nordic Ecolabelling. The recipe shall specify for each substance: chemical name; trade name; CAS number; quantity (incl. water content); quantity in final product (specify also the total water content of the product); function; and health and environmental classification in accordance with Directives 67/548/EU and 1999/45/EU with amendments.

R7 Crayons

Constituent substances must not be classified according to Table 1 and 2 in Appendix 3.

Crayons must not contain antimony, arsenic, barium, cadmium, mercury, selenium, lead and/or hexavalent chrome.

Volatile organic solvents (vapour pressure >0.01kPa at 20°C) must not be a constituent of the crayons.

Crayons must not contain aromatic or halogenated hydrocarbons. An exception is made for aromatic hydrocarbons that are used as a denaturant in alcohol and organic pigments.

Crayons must not contain preservatives that are bioaccumulating. A preservative is not considered bioaccumulation if $BCF < 100$ or $\log K_{ow} < 3$. If both these values are available, the BCF value shall be submitted to Nordic Ecolabelling.

Declaration from the manufacturer of the crayons and manufacturer of additives that the requirement is fulfilled.

Documentation regarding preservatives, if applicable.

MSDS/product sheet complying with Directive 2001/58/EC that is no more than three years old. See appendices for assistance.

The exact recipe for the crayons shall be submitted to Nordic Ecolabelling. The recipe shall specify for each substance: chemical name; trade name; CAS number; quantity (incl. water content); quantity in final product (specify also the total water content of the product); function; and health and environmental classification in accordance with Directives 67/548/EU and 1999/45/EU with amendments.

Material requirements for body and cartridges

R8 Recycling

The body and cartridges must be made of material that is suitable for material recycling.

Applicants must certify that this requirement is fulfilled. See appendices for assistance.

R9 Paper

Paper must comprise a minimum of 50% recycled paper.

The paper manufacturer must certify that this requirement is fulfilled. The declaration must specify the name of the paper and paper mill. See appendices for assistance.

R10 Plastic

Plastic must comprise at least 50% renewable or recycled (post-consumer) material. The raw material must not contain chlorine-based plastic.

Pigments must not contain antimony, arsenic, barium, cadmium, mercury, selenium, lead and/or hexavalent chrome.

This requirement does not concern impurities from primary production. Impurities are defined as residual products from primary production that can be found in the ink, pigment or pencil lead in concentrations <0.01%. Substances that are added intentionally to a raw material are not considered as impurities irrespective of the concentration.

- The plastic manufacturer must certify that this requirement is fulfilled and enclose a material data sheet. See appendices for assistance.

R11 Proportion of certified wood raw material

50% of wood raw material must be derived from certified forests (FSC or PFSC), calculated on an annual basis.

Wood raw material includes solid wood and other natural materials such as bamboo.

Certified forestry is forestry managed in compliance with standards fulfilling Nordic Ecolabelling requirements on sustainable forestry (see Appendix 4).

- Declaration from the applicant that the requirement is fulfilled. See appendices for assistance. If the ecolabelling body considers it necessary, additional documentation may be requested.

R12 Origin of renewable materials

The licensee must guarantee the traceability of all raw materials. The licensee must ensure that raw materials do not originate from environments meriting protection due to their high biological and/or social value. If it emerges that timber originating from environments of high biological and/or social value is used, the ecolabelling body may revoke the licence.

- Declaration from the applicant that the requirement is fulfilled.
Name (Latin name and Danish/Finnish/Norwegian/Swedish name), geographic origin (country/state and region/province/municipality) and supplier of the wood raw materials used. See appendices for assistance. If the ecolabelling body considers it necessary, additional documentation may be requested.

R13 Metals

The body and body parts must not contain lead, mercury, cadmium, chromium or nickel.

This requirement does not concern impurities from primary production. Impurities are defined as residual products from primary production that can be found in the ink, pigment or pencil lead in concentrations <0.01%. Substances that are added intentionally to a raw material are not considered as impurities irrespective of the concentration.

- Declaration from the applicant that the requirement is fulfilled. See appendices for assistance.

Material requirements for ink cartridges/reservoirs

R14 Plastic

Plastic raw materials must contain only one type of polymer.

- The manufacturer of ink cartridges/reservoirs must certify that this requirement is fulfilled and enclose a material data sheet. See appendices for assistance.

R15 Metals

Ink cartridges/reservoirs and parts must not contain lead, mercury, cadmium, chromium or nickel.

This requirement does not concern impurities from primary production. Impurities are defined as residual products from primary production that can be found in the ink, pigment or pencil lead in concentrations <0.01%. Substances that are added intentionally to a raw material are not considered as impurities irrespective of the concentration.

- The manufacturer of ink cartridges/reservoirs must certify that this requirement is fulfilled and enclose a material data sheet. See appendices for assistance.

Packaging

R16 Customer information

The applicant must recommend the use of refills. This information must be provided on the packaging and in a product data sheet.

The packaging must display the Swan label, applicable licence number and appropriate subtext.

- Packaging and product data sheet.

R17 Chlorinated plastic materials

The packaging must not contain chlorinated plastic materials.

- Declaration from the applicant. See appendices for assistance.

R18 Paper

Paper must comprise a minimum of 70% recycled paper.

- The paper manufacturer must certify that this requirement is fulfilled. The declaration must specify the name of the paper and paper mill. See appendices for assistance.

R19 Take-back system

Relevant national regulations, legislation and/or agreements within the sector regarding the recycling systems for the packaging shall be met in the Nordic countries in which the Swan-labelled writing instrument is marketed.

- Declaration from the applicant regarding adherence to existing recycling/take-back agreements on each Nordic market.

3 Quality requirements and environmental management

To ensure that Swan requirements are fulfilled, the following procedures must be instrumented.

If the applicant's environmental management system is certified to ISO 14 001 or EMAS, where the following procedures are applied, it is sufficient if the accredited auditor certifies that the requirements are instrumented.

R20 Quality of writing instrument

The writing instrument must be of the same standard or better than equivalent products on the market.

The licensee must guarantee that the quality on delivery from manufacture of the Swan-labelled writing instrument is maintained throughout the validity period of the licence.

- Procedures for collating and, where necessary, dealing with claims and complaints regarding the quality of the Swan-labelled writing instrument.

R21 Writing length of ballpoint pens

Ball-point pens must have a minimum writing length of 4000 metres. This requirement also applies to refill cartridges.

- The applicant shall certify that this requirement is fulfilled, enclosing test records and describing the test method. See appendices for assistance.

R22 Lifetime function guarantee for ballpoint pens

The applicant must provide a lifetime function guarantee for Swan-labelled ballpoint pens.

- Declaration from the applicant that the requirement is fulfilled. Enclose the guarantee conditions. See appendices for assistance.

R23 Laws and regulations

The licensee must ensure that applicable laws and regulations in force are observed at facilities at which the Swan-labelled product is manufactured. For example, safety, work environment, environmental legislation, plant-specific conditions and concessions.

Fundamental principles and rights regarding working conditions must be fulfilled during the production of the Swan-labelled writing instrument.

The licensee must ensure that the production of the writing instrument adheres to the ILO conventions regarding child labour, forced labour, health and safety, freedom of association and collective bargaining, discrimination, discipline, hours of work and wages.

- Declaration from the applicant that the requirement is fulfilled. Additionally, a specification of contacts with inspection authorities and code of conduct regarding ILO conventions or SA8000 certification.

R24 Environmental policy

The applicant must draw up an environmental policy that describes the applicant's level of ambition and environmental commitment. This environmental policy must be signed by the managing director/administrative director.

- Enclose documentation.

R25 Swan licence administrator

The company shall appoint an individual responsible for ensuring the fulfilment of Swan requirements, and a contact person for communications with Nordic Ecolabelling.

- A chart of the company's organizational structure detailing who is responsible for the above.

R26 Documentation

The licensee must be able to present a copy of the application, and factual and calculation data supporting the documents submitted on application (including test reports, documents from suppliers and suchlike).

- Checked on site.

R27 Planned changes

Written notice must be given to Nordic Ecolabelling of planned changes that have a bearing on Swan requirements.

- Procedures detailing how planned changes are handled.

R28 Unplanned nonconformities

Unplanned nonconformities that have a bearing on Swan requirements must be reported to Nordic Ecolabelling in writing and journalled.

- Procedures detailing how unplanned nonconformities are handled.

R29 Traceability

The licensee must have a traceability system for the production of the Swan-labelled writing instruments.

- Description of/procedures for the fulfilment of the requirement.

R30 Marketing

Marketing of the Swan-labelled writing instrument shall comply with "Regulations for Nordic Ecolabelling" of 12 December 2001 or later version.

☒ Appendix 1 duly completed.

Marketing

The Swan label is a very well-known and well-reputed trademark in the Nordic region. Swan-labelled writing instruments may be marketed using the Swan label so long as the associated licence is valid.

The label must be positioned so that there is no doubt as to what the label refers to and so that it is clear that the writing instrument is ecolabelled.

More information on marketing can be found in "Regulations for Nordic Ecolabelling" of 12 December 2001 or later version.

Design of the Swan label

Design of the Swan label:



Licence number

Each licence has a unique six-digit licence number that must accompany the label.

More information on the design of the label can be found in "Regulations for Nordic Ecolabelling" of 12 December 2001 or later version.

Follow-up inspections

Nordic Ecolabelling may decide to check whether the writing instrument fulfils Swan requirements during the licence period. This may involve a site visit, random sampling or similar test.

The licence may be revoked if it is evident that the writing instruments, manufacturer or suppliers do not meet the requirements.

Random samples may also be taken in-store and analysed by an independent laboratory. If the requirements are not met, Nordic Ecolabelling may charge the costs of follow-up inspections to the licensee.

How long is a licence valid?

Nordic Ecolabelling adopted the criteria for XX on DAY MONTH YEAR. The criteria are valid until DAY MONTH YEAR.

An ecolabel licence is valid providing the criteria are fulfilled and until the criteria expire. The validity period of the criteria may be extended or adjusted, in which case the licence is automatically extended and the licensee informed.

Revised criteria shall be published at least one year prior to the expiry of the present criteria. The licensee is then offered the opportunity to renew their licence.

Appendix 1

Marketing of Swan-labelled writing instruments

We hereby certify that we are well acquainted with the regulations governing the use of the Swan ecolabel, as detailed in "Regulations for Nordic Ecolabelling" of 12 December 2001 or later version. We agree to follow these regulations when marketing the Swan-labelled writing instrument.

Further, we confirm that we are familiar with the criteria document regarding the Swan labelling of the writing instrument.

We undertake to advise those individuals within the company involved in marketing the Swan-labelled writing instruments of the criteria for the Swan labelling of writing instruments and "Regulations for Nordic Ecolabelling" of 12 December 2001 or later version.

Location and date	Company
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Signature, contact person

Clarification of signature	Phone
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Signature, marketing manager

Clarification of signature	Phone
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In case of a change in personnel, a new declaration must be submitted to Nordic Ecolabelling.

Appendix 2

Analysis and test laboratories

Requirements on the analysis laboratory

The analysis laboratory used shall fulfil the general requirements of standard EN ISO 17025 or have official GLP status.

The applicant's own analysis laboratory/test procedure may be approved for analysis and testing if:

- sampling and analysis is monitored by the authorities, or
- the manufacturer's quality assurance system covers analysis and sampling and is certified to ISO 9001 or ISO 9002, or
- the manufacturer can demonstrate agreement between a first-time test conducted at the manufacturer's own laboratory and testing carried out in parallel at an independent test institute, and the manufacturer takes samples in accordance with a fixed sampling schedule.

Appendix 3

Chemicals prohibited by R4-R7

Classification according to EU Dangerous Substance Directive 67/548/EEC and EU Dangerous Preparation Directive 1999/45/EC with amendments.

Note that the producer of ink and constituent substances is responsible for classification.

Classification	Danger class
Dangerous for the environment	N with R50, R50/53, R51/53, R52 or R53 N without R52/53
Very toxic	T+
Toxic	T
Harmful*	Xn
Irritant**	Xi
Corrosive	C with R34 or R35
Allergenic	Xn with R42 or Xi with R43 – applies only to products intended for children
Carcinogenic	Canc1, Canc2 or Canc3 with R40, R45 and/or R49
Mutagenic	Mut1, Mut2 or Mut3 with R46 and/or R68
Reproduction toxic	Repr1, Repr2 or Repr3 with R60, R61, R62, R63 and/or R64
Explosive	E
Extremely flammable: F+	F+

* Exception: Archive grade ink classified as R22.

** Exception: Products classified as R36, R37 and/or R38

Table 1. Classification of ink, pigment, pencil leads and crayons.

Classification	Danger class
Dangerous for the environment	N with R50, R50/53, R51/53, R52 or R53 N without R52/53
Very toxic	T+
Toxic	T
Harmful*	Xn
Allergenic	Xn with R42 or Xi with R43 – applies only to products intended for children
Carcinogenic	Canc1, Canc2 or Canc3 with R40, R45 and/or R49
Mutagenic	Mut1, Mut2 or Mut3 with R46 and/or R68
Reproduction toxic	Repr1, Repr2 or Repr3 with R60, R61, R62, R63 and/or R64

* Exception: Constituent substances of archive grade ink that are classified as R22.

Table 2. Classification of constituent substances of ink, pigment, pencil leads and crayons.

Appendix 4 Guidelines for forest certification

Certified wood used shall be certified by a third party in accordance with current forestry standards that fulfil the requirements on standards and certification systems. The following requirements apply to standards, certification systems and certification bodies approved by Nordic Ecolabelling.

Standards

The standard must balance economic, ecological and social interests and comply with the UN Rio Declaration, Agenda 21 and the Statement of Forest Principles, and respect applicable international conventions and agreements.

The standard must contain absolute requirements. It must encourage and promote sustainable forestry.

The standard must be generally available. The standard must have been developed in an open process in which stakeholders with ecological, economic and social interests have been invited to participate.

Certification system

The certification system must be open, have wide-spread national or international credibility and be able to verify that the requirements in the forestry standard (see above) are fulfilled.

Certification body

The certification body must be independent and recognised. It must be able to verify that the requirements in the standard are met, able to communicate the results and be suitable for the efficient application of the standard.

Nordic Ecolabelling may request further documents to assess whether the requirements regarding standards and certification systems are met.