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# Chlorine Free Products Association

TCF/PCF Mark

Certification Standards

for

Printing and Writing Paper  
CFPA #102



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# CHLORINE FREE PRODUCTS ASSOCIATION

The Chlorine Free Products Association is a non-profit trade organization devoted to market development, standard setting, product certification, and public education. The CFPA helps identify environmentally preferable **TCF** *Totally Chlorine Free* and **PCF** *Processed Chlorine Free* products in order to encourage and enable consumers to purchase such products that reduce impacts on the air, water, and earth. Through its standard setting, certification, information and education programs, the Chlorine Free Products Association:

- ⇒ Identifies products that are designed and manufactured in a Totally Chlorine Free environmentally preferable manner;
- ⇒ Offers scientific analysis to help consumers make educated purchasing decision regarding environmental impacts;
- ⇒ Ensures consumers that any products bearing the Chlorine Free Products Association mark has earned the right to use it; and
- ⇒ Encourages manufacturers to develop new products that are significantly less damaging to the environment than their predecessors.

## THE ENVIRONMENTAL STANDARDS

The intent of our standards is to reduce the environmental impacts associated with chlorine and chlorine compound use in manufacturing, water purification, old growth timber and increased use of recyclable products. Set on a category-by-category basis, **TCF** and **PCF** Standards focus on opportunities to significantly reduce a product's environmental impact.

We offer the opportunity to achieve certification to all products covered by our standards. Those, which comply with CFPA's requirements, and have been certified, are authorized to use the CFPA **TCF/PCF** Certification Mark on products and in product advertising. Manufacturers authorized to use the CFPA, **TCF** or **PCF**, Mark on their product are subject to an ongoing program of testing, inspection, and enforcement.

For additional information on the CFPA or any of its programs, contact us at:

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## FOREWORD

The Chlorine Free Products Association, an Illinois corporation, is a not for profit trade association. We are a membership-based group engaged in education and certification services. It is the mission of this group to work in market development related to the use of chlorine free products. The CFPA is the owner of certain trademarks, including TCF {Totally Chlorine Free} and PCF {Processed Chlorine Free} term and design for products (“the Marks”). The CFPA authorizes third parties to use the Marks in conjunction with products subject to completion of control measures detailed in the TCF/PCF Certification Standards, a document that is periodically modified by CFPA.

This labeling system represents an important new direction in product identification. The strength of this labeling system is a third party, independently verified, objective declaration of environmental performance, which also includes scientifically supported claims of environmental achievement based on manufacturing data. Not lab trials or skewed studies. By using mill data from those who have chosen chlorine alternatives we eliminate confusion about product performance and misleading comparisons of environmental fulfillment promoted by manufacturers using, or selling chlorine compounds.

These Standards cover specific environmental performance and contains only those requirements that may be objectively audited for certification/registration purposes. They are intended to provide organizations an accounting system that provides measurable and scientific data. Like other International Standards, they are not intended to be used to create non-tariff trade barriers, or to increase, or to change an organizations legal obligation.

There is an important distinction between these specifications, which describe the requirements for certification/registration, and/or self-declaration of an organization non-certifiable guideline intended to provide generic assurance. This system encompasses a full range of issues including those with strategic and competitive implications.

## **A. General Information.**

Our Environmental Standard contains the basic requirements for certain products (as defined in the Scope section below) to be certified by CFPA and for their manufacturers to receive authorization to use the CFPA TCF/PCF Certification Marks on products and their packaging, and in product advertising. Requirements are based on the use of chlorine chemistry, old growth timber, recycled content, an assessment of the environmental impacts of product manufacture, use and disposal, and reflect information and advice obtained from industry, trade associations, and specification setting organizations both nationally and internationally. Requirements are subject to revision that as further experience and investigation may show is necessary or desirable.

## **B. Compliance with the Standard.**

Compliance with this Standard is one of the conditions of certification of a product by CFPA.

## **C. Compliance with Government Rules.**

In order to be authorized to use the CFPA TCF/PCF Certification Marks, the manufacturer of certified product must disclose all governmental allegations and determinations of violation of international, federal, state, or local environmental laws or regulations with respect to facilities in which the product is manufactured from the past 3 years. The manufacturer must release copies of water quality and air quality permits. In the case of accident or permit violation(s) that affect the production process of the certified product(s), the manufacturer must provide immediate full disclosure regarding said accident or permit violation(s) to the CFPA.

The manufacturer must also abide by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), ILO Conventions and the International Tropical Timber Agreement ITTA-94. Certification will be denied any product manufactured in violation of environmental laws or regulations if, in CFPA's judgement, such violations indicate that the environmental impacts of the product significantly exceed those contemplated in the setting of the standard.

## **D. Chain of Custody**

In order to maintain the validity of the CFPA TCF/PCF certification and labeling program, mill officials upon request, must provide documentation regarding original fiber sources and illustrate the chain of custody procedures taken between the source and the mill where the fiber will be processed into the certified good. Said documentation must include contact names, phone numbers and addresses. The purpose of scrutinizing the chain of custody is to guarantee that fiber from neither old growth forest, as defined in section 2.5, nor unsustainable managed forests is used in certified products. The definition of unsustainable land management is land management that does not abide by the minimum standard of sustainable land management, as defined in section 6.

If a mill uses old growth fiber or fiber from unsustainable managed forests, the fiber used in certified pulp and paper products must be transported and stored physically separately. The goal of separation is to ensure contamination of acceptable fiber resources does not take place.

## **E. Limitations on Purpose of Standard.**

CFPA's Standards provide basic criteria to promote environmental quality. Provisions for product safety have not been included in this Standard because government agencies and other national standard-setting organizations establish and enforce safety requirements.

## **F. Substantially Equivalent Products.**

Products that are manufactured in the same facility and are substantially similar to those covered by this standard in terms of function and environmental impact may be evaluated and certified by the CFPA against the intent of the requirements of this standard.

## **G. Certification Agreement and Chlorine Free Products Association Rules.**

The CFPA TCF/PCF Certification Marks are valid for a 60-month period, which begins once manufacturer is notified and authorized to use the CFPA TCF/PCF Certification Marks. In order to be authorized to apply the CFPA TCF/PCF Certification Marks to a product or its packaging, or to use the Certification Mark in product advertising, the manufacturer of the product must (1) Undergo an initial mill audit to determine that the product produced comply with CFPA's requirements. (2) Sign a CFPA Certification Agreement. (3) Pay fees to cover the costs of mill audit, testing and monitoring. (4) Agree to a minimum of a 5-year ongoing program of mill inspections and audits. (5) Comply with the requirements found in the most recent version of "Rules Governing the Use of the CFPA TCF/PCF Certification Marks."

## **H. Re-Certification and Re-Authorization**

At the end of the 5 year certification agreement, which begins once the manufacturer is notified and authorized to use the CFPA TCF/PCF Certification Marks, the certified must notify the CFPA, 90 days prior to expiration, in writing, of their intentions of continuing to use the CFPA TCF/PCF Certification Marks. We will re-authorize the use of the CFPA TCF/PCF Certification Marks for an additional one-year for a fee based on membership status. The CFPA requires all certified manufacturers to complete re-certification, including full mill audit, fee based on membership status, by our authorized consultant, at the beginning of each third year period prior to awarding the CFPA TCF/PCF Certification Marks.

## **I. Product Line Grade Extension Certification**

The CFPA TCF/PCF Certification Marks are available for use on certified product line/grade extensions, for a fee based on number of extensions. To consider granting use of CFPA TCF/PCF Certification Mark on certified product line/grade extension we must have: Written request, within 3 months of passing and completing the initial mill audit, of companies intent to introduce a grade/line extension of a certified product which company would like to identify and carry the CFPA TCF/PCF Certification Mark; Raw material sources must be the same as certified product. We must have third party verification of all ingredients. If the CFPA does not have the proper documentation manufacturer must complete and pass an audit for the product grade/line prior to use of CFPA TCF/PCF Certification Marks. If the CFPA is given written notice during our initial mill audit, of possible grade/line extensions, we will incorporate this information into the audit.

## **J. Disclaimer of Liability.**

CFPA, in performing its functions in accordance with its objectives, does not assume or undertake to discharge any responsibility of the manufacturer or any other party. CFPA shall not incur any obligations or liability for damages, including consequential damages, arising out of or in connection with the interpretation of, reliance upon, or any other use of this Standard.

## **K. Care in Testing.**

Many tests required by CFPA's Standard involve safety consideration. Adequate safeguards for personnel and property should be employed in conducting such tests.

## **L. Reference Standards.**

A later edition may have superseded standards referenced in this document, and it is intended that the most recent edition of all referenced standards be used in determining compliance of a product with this standard.

## **M. Labeling Requirements.**

This standard neither modifies nor supersedes government labeling requirements. Labeling language, which varies in form from the requirements of this section, may be used with the written approval of the CFPA.

## **N. Violation Clause**

If a manufacturer producing a certified TCF/PCF product is found negligent and in violation of any of the agreed terms, including but not limited to: violating their environmental permit, found using chlorine compound components, found using fiber from old growth or unsustainable managed forests in a certified product, or other grievous and negligent violation, a fine of \$10,000 may be levied at the discretion of the CFPA. The manufacturer must cease the use of the CFPA TCF/PCF certification marks; withdraw the use of the CFPA TCF/PCF Certification Marks from promotional materials and packaging. Prior to re-use or reauthorization it will be necessary to re-certify the manufacturer with a complete manufacturing audit, fee based on membership status, or product line. Determination if whether or not a fine is levied will depend on the severity of the violation, the history of environmental compliance/violations for the facility and what steps are being taken to ensure future violations do not occur. This fee is imposed to cover damage and defamation to the CFPA TCF/PCF certification marks. It is imperative to all participants that we protect the value of the CFPA TCF/PCF Certification Marks in the market.

It is a violation of the CFPA Certification Agreement and illegal to private label a product, for any customer or reason, using the CFPA definitions and standards. If after the Initial Mill Audit it is concluded that manufacturer cannot meet the TCF/PCF Certification requirement they will pay all customary fees and travel expenses.

## **O. Cancellation Clause**

At the end of the 5-year period, unless the certified has been charged or found in violation of the certification terms, in which case the Violation Clause is in effect, either party has the right to terminate this agreement. Parties must notify, 90 days prior to the end of the sixty - month period, which begins once the manufacturer is notified and authorized to use the CFPA TCF/PCF Certification Marks, in writing their intent to cancel the certification agreement.

Upon mutual agreement of both parties, and considering that all financial and performance requirements have been satisfied, termination of this agreement is available once during this five year agreement which comes at the completion of the second year.

If the manufacturing party is canceling the certification agreement they must not produce any additional product that they intend to label carrying the CFPA TCF/PCF Certification Marks during this period. If said manufacturer is found deliberately, or unknowingly, building inventory while notifying the CFPA of their intent to cancel the certification agreement, the CFPA has the right to invoke the Violation Clause. The manufacturing party will notify the CFPA of the amount of inventory which carries the CFPA TCF/PCF Certification Marks and have the right to sell remaining inventories labeled and carrying the CFPA TCF/PCF Certification Marks until said inventories are depleted.

## **ENVIRONMENTAL STANDARD**

## **1 Scope**

This standard establishes environmental requirements for TCF/PCF printing and writing papers:

- 1.1 Printing and writing paper.** The subcategories of paper included in the Standard are:
  - 1.1.1** Blanks including papers for printed signs, point of purchase displays, window displays, posters and calendar backs.
  - 1.1.2** Bond paper including letterhead, stationery, invoices, self-adhesive notepaper, statement papers and duplicating papers for gelatin type of hectographic reproduction.
  - 1.1.3** Bristols including file folders, index cards, ruled forms, mailing cards, tag papers, wedding invitations, and postal bristol.
  - 1.1.4** Business forms including papers sold to be used in business forms and computer printout paper.
  - 1.1.5** Copy paper including paper made for use in the high-speed electrostatic reproduction process.
  - 1.1.6** Cover paper including heavy papers sold for use as covers for books, catalogs, brochures, pamphlets and similar purposes.
  - 1.1.7** Drawing paper including papers for architects, artists, and draftsmen for pen or pencil drawings and paper used primarily by school children for sketching, crayon, or watercolor work.
  - 1.1.8** Ledger paper including paper used in bound a loose-leaf ledger books, accounting record systems, and legal paper.
  - 1.1.9** Lightweight printing paper including high quality, high opacity lightweight papers used in bibles, dictionaries, manuals, and professional reference books to reduce bulk.
  - 1.1.10** Manifold and onionskin paper including paper used for airmail stationery, catalogs, manuals, envelope enclosures, advertisements and carbon copies of correspondence and legal documents.
  - 1.1.11** Tablet papers including loose-leaf paper, notebooks, note pads, adding machine rolls, and cash register rolls.
  - 1.1.12** Text paper including paper used in annual reports, booklets, menus, and announcements. Advertising and corporate advertising circulars.
  - 1.1.13** Uncoated offset papers including papers used for personalized computer generated letters and promotional mailings in the business forms industry, book manufacturing, magazine blow cards, and duplicating paper for spirit machines.
  - 1.1.14** Gift-wrapping papers including plain and decorated wrapping papers, not including packaging or packing materials.
  - 1.1.15** Other recycled printing and writing paper including all other paper sold primarily for use in printing and writing.

## **1.2 Paper specifically excluded from this Standard.**



This Standard specifically does not include the following paper:

- 1.2.1 Uncoated groundwood papers including Newsprint. [Newsprint is covered by CFP Standard #105]
- 1.2.2 Packaging materials.
- 1.2.3 Tissue products. [Tissue Products are covered by CFP Standards # 103]
- 1.2.4 Specialty papers such as carbon paper and carbonless paper.
- 1.2.5 Coated groundwood paper and coated free sheet printing paper [these products are covered by CFP Standard #101].

## 2 Definitions

- 2.1 **Totally Chlorine Free {TCF}** – is a term reserved for virgin fiber papers. TCF papers do not use pulp produced with chlorine or chlorine containing compounds as bleaching agents. A certified producer has no current nor pending environmental permit violations and the pulp fiber comes from sustainable harvested forests free of old growth.
- 2.2 **Processed Chlorine Free {PCF}** – is a term reserved for recycled content papers. All recycled fibers used, as a feedstock must meet EPA, or regional governing authority, guidelines for post consumer content and have not been re-bleached with chlorine containing compounds. Minimum depending on grade of 30% PCW is required. A certified producer has no current nor pending environmental permit violations and the pulp fiber comes from sustainable harvested forests free of old growth. If a paper contains any virgin fiber that fiber is **Totally Chlorine Free**.
- 2.3 **Post-consumer material {PCW}** - means those finished products, packages or materials generated by a business or consumer that have served their intended end uses and that have been recovered from or otherwise diverted from the waste stream for the purpose of recycling.
- 2.4 **Recovered materials** - means waste materials and by-products that have been recovered or diverted from solid waste, but such term does not include those materials and by-products generated from, and commonly reused within, an original manufacturing process (Mill Broke).
- 2.5 **Non-Fibrous Materials** to be defined by the licensee as to the exact mixture of what paper loading materials and chemical make up have been used to include: clay fillers, starches, non-chlorinated latex, titanium, talc, alum, etc
- 2.6 **Old Growth Timber** – Old growth as defined by biologist refers to trees that have been growing for approximately 200 years or older. A forest that has not been distributed by industrial activity.
- 2.7 **Productive Forest** – Forest areas that produce more than 1 cubic meter per hectare per year
- 2.8 **Chain of Custody** – Documentation of tree ownership, plantation or lot location, to logger, to shipper, to chipper or processing mill.

## 3. Product-Specific Performance Requirements

The paper must meet regional standards and customer specifications with respect to quality and specific product performance.

#### **4. Product-Specific Environmental Requirements**

The product must meet the requirements under **either** section 4.1 (Processed Chlorine Free Content Requirements) or section 4.2 (Production Process Requirements).

#### **4.1 Processed Chlorine Free Content Requirements**

**4.1.1** For high-speed copy paper, offset paper, forms bond, computer printout paper, file folders, and white woven envelopes, and for other uncoated printing and writing paper, such as writing and office paper, book paper, cotton fiber paper, and cover stock, the product shall contain at least 30 % pcw fiber not bleached with chlorine compounds and the virgin fiber must be totally chlorine free.

**4.1.2.1** The percentage of recovered material and post-consumer material shall be calculated and certified based on the fiber weight of the paper. Calculations will also be performed based on the total weight of the paper.

**4.1.2.2** The calculation of recycled content base on fiber weight shall be performed using the following formulas.

**4.1.3.1** Recovered Material:

$$\frac{(\text{Recovered Material} \times \text{Yield})}{[(\text{Virgin Pulp} \times \text{Yield}) + (\text{Recovered Material} \times \text{Yield})]}$$

**4.1.3.2.** Post-consumer Material:

$$\frac{(\text{Post Consumer Material} \times \text{Yield})}{[(\text{Virgin Pulp} \times \text{Yield}) + (\text{Recovered Material} \times \text{Yield})]}$$

**4.1.4** The calculation of recycled content based on total weight shall be performed using the following formulas:

**4.1.4.1** Recovered Material:

$$\frac{(\text{Recovered Material} \times \text{Yield})}{[(\text{Non-Fibrous Material} \times \text{Yield}) + (\text{Virgin Pulp} \times \text{Yield}) + (\text{Recovered Material} \times \text{Yield})]}$$

**4.1.4.2** Post Consumer Material:

$$\frac{(\text{Post Consumer Material} \times \text{Yield})}{[(\text{Non-Fibrous Material} \times \text{Yield}) + (\text{Virgin Pulp} \times \text{Yield}) + (\text{Recovered Material} \times \text{Yield})]}$$

**4.1.5** Yield loss will depend on the product manufactured, the raw material, the level of contaminants and the cleaning and deinking technology employed. The percentage yield shall be calculated by dividing the total material output by the total material input.<sup>1</sup>

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<sup>1</sup> Alternatively, the post consumer content may be calculated using the wet weight of the pulp added directly to the blend chest during papermaking.

**4.1.6** The percentage of recovered material and post-consumer material shall be calculated based on a weighted average of the materials used for a period of time not to exceed the previous three months.<sup>2</sup>

## **4.2 Production Process Requirements**

**4.2.1** If recovered material is used to manufacture the product, it shall not be deinked using a solvent containing chlorine: or one listed by the Environmental Protection Agency pursuant of Section 313 of the Emergency Planning and Community Right to Know Act (EPCRA), 40 CFR section 372.

**4.2.2** Neither chlorine nor any of its derivatives (such a hypochlorite and chlorine dioxide) shall be used in the bleaching agent if bleaching is employed in the manufacturing of virgin pulp used in the product, in the processing of recovered material, or in the manufacturing of the product itself.

## **5 Toxics in Packaging**

**5.1** The sum of the concentration levels of lead, cadmium, mercury, and hexavalent chromium present in any package or packaging component shall not exceed 100 parts per million by weight.

## **6. Land Management Requirements**

The CFPA recognizes and accepts the standards set by third party international certifiers such as: {FSC} Forest Stewardship Council, {PEFC} Pan European Forest Certification, {SCS} Scientific Certification Systems, {CFP} Certified Forest Products, {SM} Smart Wood, etc. We also will recognize and accept other certification programs utilizing independent third party audits based on regional requirements. Prior to recognizing and accepting these programs each is evaluated using the following criteria.

**6.1** Forest management operations shall be sustainable in the long term. Regeneration felling shall be followed by the reforestation of the area. The success of the regeneration efforts shall be monitored to ensure the regeneration efforts have been successful.

**6.2** A minimum of five percent of productive forest area is exempt from other measures than the management required to preserve and support the natural biological diversity of the habitat. (Productive forest area is defined as forest areas that produce less than one 1 cubic meter per hectare per year).

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<sup>2</sup> If a particular manufacturer's operating procedures do not provide for accurate yield measurements, the following shall be used as default values:



Recovered/Post-Consumer Material:	70%
Virgin Pulp	70%
Non-fibrous material:	100%

The following may not be included:

- areas sold to a public or private organization for the purpose of nature conservation
- Care-demanding areas and transitions zones normally demarcated when felling is carried out

- 6.3** A minimum of five cubic meters per hectare of trees of biodiversity or cultural value shall be left. This rule does not apply to plantations. Trees of biodiversity value may include:
- dead wood
  - large trees with notable wide girth
  - locally rare tree species
  - fire scarred trees
  - hollow trees
- 6.4** Landowners that add or restore nitrogen and mineral substances shall demonstrate with comprehensive documentation that the practice does not have a detrimental effect on the local water quality.
- 6.5** Landowners should phase out synthetic pesticides and herbicides containing chlorine by the year 2003.

#### **Appendix: Labeling Requirements for Certification by CFPA**

1. The CFPA **TCF/PCF** Certification Marks shall appear on the package. It may also be printed, embossed or watermarked on the product by the product manufacturer. Wherever CFPA Certification Marks appears on a package, the package shall contain a description of the basis of certification. This description shall be in a location, style and typeface easily readable by the consumer.
2. The CFPA **TCF/PCF** Certification Marks shall not be used in conjunction with any modifying terms, phrases, or graphic images that might mislead consumers as to the extent or nature of the certification.
3. If the product is certified for meeting the requirements of section 4.1, wherever it appears the CFPA **PCF** Certification Mark may be accompanied by the phrase, "Certified XX% post-consumer material." The phrase, "Meets Federal Procurement Guidelines", may also be used.  

4. If the product is certified for meeting the requirements of section 4.2, wherever it appears the CFPA **TCF** Certification Mark may be accompanied by the phrase, "Certified no chlorine bleach", "Oxygen Bleached", "Unbleached" or an equivalent description approved in writing by CFPA. (as appropriate).  

5. Labeling language, which varies from the requirements of this section, may be used with the written approval of the CFPA. In the event of a conflict between a CFPA labeling requirement and a government-labeling requirement, the government requirement will take precedence.