

19 December 2007  
LMP/CDL

## Concerning: Hearing on Swan-labelling of Chemical building products

Dear Sir/Madam

A working group within Nordic Ecolabelling has in collaboration with experts worked out a draft proposal for criteria for Swan-labelling of Chemical building products.

Eco-labelling Denmark asks kindly for your comments no later than **29 February 2008**. The proposal will hereafter be discussed at the Danish Ecolabelling Board and thereafter at the Nordic Eco-labelling Board.

Besides the proposal in general we ask you to pay attention to the following, which we would like the comment to include elaborate descriptions and the reasons for the comments – both when it regards compliance and disagreement:

1. Are the levels for classifying inorganic chemical (O3), organotin compounds (O5), preservatives (O6), formaldehyde (O7) and residual monomers (O8) suitable? What is fine and why? What could be different and why?
2. Are the levels for titanium dioxide production appropriate? Specific comments regarding compliance are very much welcome.
3. Are the levels for VOC in the different products appropriate? For which level will it be appropriate to make the TVOC test (O16 that will possibly apply for the other product groups)? What is the reasoning behind the suggested level? The VOC levels are described for adhesives in O15, for sealants in O18, for fillers in O20 and for outdoor paint and varnish in O22.
4. Are the proposed quality requirements relevant? Should there be any other relevant tests? Are the levels appropriate?

Please note that Nordic Ecolabelling aims that only the best third of the products on the market can be Swan-labelled. Please take this into account in your comments for the proposed criteria and the background document.

Furthermore be aware that Outdoor paint and varnishes are included in the proposed criteria. But since criteria for the Flower is under development in the EU, it is possible that Outdoor paint and varnishes will be taken out of the criteria document for Chemical building products.

The proposed criteria and the background document will be available at Eco-labelling Denmark's web site [www.ecolabel.dk](http://www.ecolabel.dk). The documents are in PDF format, and they can only be opened and read via the program Adobe Acrobat Reader. You can download the program for free from Adobe's web site: [www.adobe.dk](http://www.adobe.dk). If you prefer it the documents send to you please order them at Eco-labelling Denmark phone +45 72 400 450.

### **Who may comment?**

All persons, companies and institutions interested in developing the criteria for Swan-labelling of Chemical building products may comment on the proposal. We ask you kindly to spread the information on the hearing to those who may be interested.

If you choose to use the enclosed statement form please send it to Eco-labelling Denmark Kollegievej 6, DK-2920 Charlottenlund Denmark or fax it to +45 72 300 451. Your comments should reach us no later than **29 February 2008**.

When the review has ended and the criteria document has been adopted by the Nordic Eco-labelling Board a hearing compilation will be sent to those who have commented on the proposal as well as it will be published on Eco-labelling Denmark's website.

We hope to hear from you soon.

Yours sincerely  
Eco-labelling Denmark



Lene Møldrup  
Project Leader

Enclosed: Statement form and lists of interested parties in the Nordic countries.