

To our stakeholders

Date 30. November 2022

Public Consultation of proposal for generation 4 of Criteria for Nordic Swan Ecolabelling of Paints and varnishes

We hereby invite you to comment on our proposal for criteria for Nordic Swan Ecolabelling of Paints and varnishes. Your comments are important when the proposal is to be discussed and decided by the Danish and Nordic Ecolabelling Boards.

We would like to receive your comments before 08.02.2023. Submit your comments to hoerings svar@ecolabel.dk. Your contact person in Denmark is Head of Criteria Heidi Belinda Bugge hbb@ecolabel.dk. You can find the proposal on our Nordic website under the heading [Criteria Consultations](#).

The criteria of Indoor and outdoor paints and varnishes is based on the current generation of Indoor paints and varnishes (gen 3). Paints and varnishes for outdoor use and industrial paints and varnishes have been moved from the criteria for Chemical building products to the criteria of Indoor and outdoor paints and varnishes.

Major changes

- **Product types covered by the criteria:** the criteria now also include both paint and varnish for outdoor use and industrial paints.
- **Energy and climate:** new requirements have been added for the raw material manufacturer of cement/hydraulic binders and titanium dioxide.
- **Indoor climate:** new requirements have been added and previous requirements have been adjusted with the introduction of emission testing of the final product. The criteria for emissions is in compliance with the EU-Taxonomy and Annex XVII to Regulation (EC) No 1907/2006 regarding restriction on formaldehyde and formaldehyde releasing substances.
- **Chemical requirements:** for ingoing substances, requirements have been revised and sharpened. Furthermore, new criteria for restriction of endocrine disruptors have been added.
- **To promote a more circular economy:** previous requirements for packaging have been replaced with new requirements concerning recycled material in plastic pouches and containers.
- **Sustainable raw materials:** new requirements have been introduced to different binders to increase the use of renewable raw materials including a ban on palm oil and PFAD.

Most important issues

Nordic Ecolabelling would like to have comments on the complete criteria set, but would like to highlight the following points:

- Product group definition, what can be included and what is not considered as a paint or varnish.
- O4 Environmentally harmful substances (updated calculation formula and new limit value).
- O5 Preservatives (limit value lowered for outdoor and industrial paints).
- O6 Formaldehyde (indoor emission requirement).
- O12 Prohibited substances, updated for endocrine disruptors (lists I, II and III <http://edlists.org>) and bisphenol restriction.
- O9 Titanium dioxide (energy-requirements). Input on what is proposed is very welcome. Energy thresholds for the traditional sulphate and chloride processes are proposed here. Your input is requested on if there are other, new processes that are relevant in this requirement.
- O13 and O14 Emissions and content of Volatile and Semi-volatile Organic Compounds in outdoor paints and varnishes and industrial paints
- O16 Acrylic resins. Requirements on renewable raw materials including a ban on palm oil and PFAD.
- O18 Cement/Hydraulic binder (global warming potential).
- O19 - O25 Quality requirements (are the standards still relevant?)
- O30 Quality requirements for anti-corrosion paints
- O31 Metal packaging (prohibition of metal packaging).
- O32 Recycled material in hard plastic packaging.
- O33 Recycled material in flexible bags and pouches.

Who can submit comments?

All enterprises, institutions, or persons interested in the development of the criteria for Nordic Ecolabelling of Paints and varnishes are entitled to submit comments.

We kindly ask you to spread the information about this consultation to anyone interested in the proposal.

Consultation webinar Friday 9 December 2022 at 10:00-11:15 CET

Nordic Ecolabelling will organise a consultation webinar.

- Date and time: Friday 9 December at 10:00-11:15 CET.
- Place: The webinar will be run in Microsoft Teams.

Sign up by mail to Thor Hirsch no later than Thursday 8 December at 16:00 CET to get a link to the webinar th@svanemerket.no.

Onward process

All comments will be examined and assessed at the end of the consultation period. Subsequently a revised proposal for criteria will be prepared. This proposal will be discussed by the Danish Ecolabelling



Board and national Ecolabelling Boards in the other four Nordic countries. The final decision on the criteria is made by the Nordic Ecolabelling Board based on the opinions of the national boards. The material used for this process is, apart from a proposal for criteria, a compilation of all the public consultation comments together with the responses from Nordic Ecolabelling. This compilation will be published on our [website](#).

We are looking forward to receiving your comments before 08.02.2023.

Kind regards
Ecolabelling Denmark

Heidi Belinda Bugge
Head of Criteria