



2nd Ad-Hoc Working Group (AHWG) meeting for the revision of EU Ecolabel criteria for indoor and outdoor paints and varnishes

13 November 2024

Online Meeting (Webex)

Presentation about policy and project background, product group scope and definitions and revised criteria proposals

Minutes of the meeting

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Participants

ADEME (EY)
AFNOR (FR)
ALLIOS
Amonncolor
ASEFAPI
Adler-Lacke
AkzoNobel
Arxada
BASF SE
BE CB/ FPS Health
BLATEM
Catas
CB BE
CB Denmark
CB Finland
CB Germany – RAL
CB IT - ISPRA
CB NL - SMK
CB Poland
CB PT
CB Sweden
CEFIC, TDMA
CEPE
Chemours
CHROTEX
DAW-FR
EC DG ENV
EEB/BEUC
ERF
Eurofins Product Testing
Evonik
FIPEC
IVAS Industria Vernici S.p.A
JRC – Joint Research Centre
OMYA
Peter Kwasny Group
PPG
Röhm GmbH
Somefor
Sherwin Williams
VITEX S.A.
Swarco
UNIKALO
VM – Viegand Maagøe
Wacker Chemie AG

Note to readers:

The meeting was run virtually using the WEBEX platform. For each agenda point, a short presentation was given by the JRC, after which participants requesting the “FLOOR” (via the chat function) intervened providing oral comments which then were addressed by the JRC.

Agenda

| 13 November 2024 | | |
|------------------|----------------------------------------------------------------------------------------------------------------------------|---------------|
| | Item description | Schedule |
| 1. | Opening of virtual room and welcome of participants | 08:45 – 09:00 |
| 2. | Introduction, political objectives of the EU Ecolabel and process description | 09:00 – 09:15 |
| 3. | Update of LCA screening studies | 09:15 – 09:45 |
| 4. | Scope and definitions | 09:45 – 10:30 |
| | Coffee Break (15 min) | 10:30 – 10:45 |
| 5. | Criterion 1: TiO ₂ production (in draft Annexes I, II and III) | 10:45 – 11:30 |
| 6. | Criterion 2: Efficiency in use (in draft Annexes I, II and III) | 11:30 – 12:15 |
| 7. | Criterion 3: VOC and SVOC content (in draft Annexes I, II and III) | 12:15 – 12:45 |
| | Lunch Break (1 hour) | 12:45 – 13:45 |
| 8. | Criterion 4: Restriction of hazardous substances and mixtures (in draft Annexes I, II and III) | 13:45 – 14:45 |
| 9. | Criterion 5: VOC emissions (in draft Annexes I, II) | 14:45 – 15:15 |
| | Coffee Break (15 min) | 15:15 – 15:30 |
| 10. | Criterion 6: Consumer information & Criterion 7: Information appearing on the EU Ecolabel (in draft Annexes I, II and III) | 15:30 – 16:00 |
| 11. | Other criteria – not included: CO ₂ footprint, biobased content, microplastics | 16:00 – 16:45 |
| 12. | Conclusions, next steps and closure of the meeting | 16:45 – 17:00 |

Point 1. Welcome and introductions

The JRC welcomed all participants to the meeting. Due to technical issues, it was announced that a new Webex meeting link would be created for the second part of the meeting. The link was shared with stakeholders *via* email, who were instructed to join after the coffee break.

Participants were informed that minutes of the meeting would be published in about two weeks. To ensure privacy, it was clarified that comments would be anonymised, and only the names of participating organizations, not individual representatives or their contact details, would be included in the minutes.

The agenda for the day was presented, along with practical instructions for participating in discussions. Attendees were advised to indicate their intention to speak by typing “floor” in the chat and waiting for the chairperson to grant them the floor. Additionally, the project team members were briefly introduced.

Point 2. Political objectives of the EU Ecolabel and process description

The JRC began by providing an overview of its operations, including its areas of activity and institutional role. Following this, an introduction to the EU Ecolabel framework was presented, covering its scope, the environmental aspects it addresses, and the benefits it offers to applicants.

The JRC explained that the current criteria for the EU Ecolabel for indoor and outdoor paints and varnishes, originally adopted in 2014, have undergone six amendments for various reasons and are set to expire on 31 December 2025. The timeline for the ongoing revision process was outlined during the presentation.

The next steps in the process, which involve iterative updates to the draft Technical Report, incorporating stakeholder feedback (e.g. 2nd AHWG meetings and various EUEB meetings), was briefly described. The final consultation will take place in March 2025, prior to the vote on the revision in Q2 of 2025.

Point 3. Update of LCA screening studies

The project team provided an overview of the background information contained in the draft Preliminary Report 2 (PR2) and draft Technical Report 2 (TR2), which the presentation was based on, noting that stakeholders should have access to these documents. It was clarified that during the 2nd AHWG meeting only updated and key changes to these reports would be presented.

Updates from the LCA screening studies included in the PR2 were highlighted. The general methodology used to carry out the PEF screening studies was briefly described, by highlighting the goal and scope of the study, the functional unit and which product categories were analysed. Modelling assumptions were also addressed, with particular attention to water-based aerosol spray paints and the significantly higher reference flow for water-based aerosol spray paints compared to conventional paints and varnishes was explained.

A breakdown of the results for a representative indoor paint with an updated formulation were presented. This analysis demonstrated how results could identify hotspots in both general impact categories and specific in individual processes. Comparisons were made with results shared during the 1st AHWG meeting.

In addition, PEF scores for indoor and outdoor wall paints and indoor and outdoor wood varnishes were presented. For each product, the contributions of different life cycle stages to the overall environmental impact were illustrated.

To support the inclusion of water-based aerosol spray paints in the scope of the EU Ecolabel, a comparison was made with solvent-based aerosol spray paints. The comparison, based on composition and CO₂ emissions per 1 m² over 50 years, demonstrated that solvent-based paints had more than double the environmental impact of their water-based counterparts. Finally, the PEF scores for both types of aerosol spray paints were presented, with an emphasis on the contributions from each life cycle stage.

No questions or comments were made by stakeholders to this section of the presentation.

Point 4. Scope and definitions

The project team began by outlining the restructuring of the EU Ecolabel (EUEL) criteria, which was based on stakeholder feedback. The restructuring involved splitting the scope into three distinct annexes:

Annex I - Decorative paints and varnishes and related products

Annex II - Performance coatings and related products

Annex III - Water-based aerosol spray paints

The rationale behind this division was explained, followed by a presentation of the main proposed changes to the scope of each annex. Stakeholders were asked to provide their opinions on the proposed scope and to contribute to refining the definition of waterproofing products and the interpretation of wording used in Directive 2004/42/CE.

In addition to the scope text and definitions, stakeholders were asked to provide feedback on whether anti-algal and anti-fungal coatings should remain within the scope of the EUEL and, if so, to indicate the appropriate annex for their inclusion.

The team proceeded to present proposed changes to definitions included in Article 4 and the Annex preamble. Clarifications were provided on which definitions would be moved to the User Manual, and questions or comments from stakeholders were requested.

Finally, the project team requested additional input from stakeholders regarding the definitions of crosslinking agents and neutralizing agents. Participants were encouraged to suggest other definitions they believe should be added by submitting comments.

An industry expert sought confirmation on whether road marking paints fall outside the scope of the EU EEL. The project team confirmed that this is indeed the case.

An NGO representative raised several concerns regarding the scope and definitions. Firstly, she recommended excluding water-based aerosol spray paints from the scope of the EU EEL due to their high VOC content, which exceeds the limits allowed in California. Regarding the definition of microplastics, the stakeholder pointed out that the current definition is vague and suggested it should include soluble and biodegradable microplastics, as well as the unintentional release of microplastics. The representative also highlighted the absence of a definition for nanoparticles and emphasized the need for its inclusion.

The project team acknowledged the comments and assured that both the VOC content of water-based aerosol spray paints and the microplastic topic would be addressed in more detail later.

Point 5. Criterion 1: Criterion 1: TiO₂ production (in draft Annexes I, II and III)

The online meeting resumed in a new virtual meeting room and the JRC informed stakeholders that the session was being recorded for internal use only by the JRC and the project team.

The project team started by presenting the proposed changes to Criterion 1, which applies to Draft Annexes I, II, and III due to the critical role of titanium dioxide (TiO₂) pigment in all paint types. The proposed updates include:

The project team proceeded to explain the addition of new emission parameters and the rationale for introducing requirements related to SO₂ emissions to air, as well as SO₄ and chloride emissions to water. These limit values were based on the 2007 BREF, as no updated data is currently available due to the ongoing revision process of the BREF.

Clarifications were provided on assessment and verification steps, including specific references to applicable test standards and detailed guidance on data collection and processing.

Finally, stakeholders were invited to provide feedback on the workability of the proposed requirements, particularly regarding their implementation and practicality.

An industry stakeholder expressed concerns about the proposed emission values, questioning what would happen if companies or license holders cannot meet the limits, particularly if the values are averages. She noted that emissions are tied to production, which fluctuates annually based on demand, and asked how licenses would be impacted if companies exceed the limits in a given year. Additionally, she inquired whether production plants outside the EU are required to comply with the same dust values and requirements. The project team acknowledged the concerns and explained that they are working with the best data available. However, the project team encouraged stakeholders to share additional data that could support potential adjustments to the proposed limits. The team emphasized the need to strike a balance in setting limits and clarified that the limits would be matched to production campaigns, rather than yearly averages. Regarding non-EU production facilities, the team stated that these facilities must also comply with the specified values and requirements.

An NGO representative noted that the 2007 BREF is outdated and expressed hope that the project team could access data from the ongoing BREF revision to update the limit values accordingly. She also advocated for using minimum values rather than averages. The project team argued that using minimum values would be challenging, as the industry is already facing difficulties meeting the proposed average values. However, they reiterated the importance of receiving additional data to support changes to the current limits.

Another industry stakeholder supported the earlier comments from the industry representative, noting that compliance with yearly averages would be difficult. He suggested exploring the possibility of calculating limits based on the characteristics of the ore used in specific production campaigns. The project team expressed openness to this idea but emphasized the need for further discussion and more detailed information. They requested arguments and data from stakeholders to better evaluate and potentially support this approach.

Point 6. Criterion 2: Efficiency in use (in draft Annexes I, II and III)

The project team presented the main changes in Criterion 2 which varies across the three annexes.

In Annex I, the main changes to the criterion are related to the scope: thick decorative paints were removed, performance coatings were moved to Annex II, and a new category “just add water” was added. In this annex, the requirement for abrasion was removed. A table where is shown if each category needs to comply with the different efficiency requirements was presented.

The project team briefly reviewed the main feedback from stakeholders after the 1st AHWG and WSG (Working Sub-Groups) meetings, including proposed changes. However, certain topics still require clarification, such as reducing the allowed gloss decrease after weathering. The project team also noted that a request to remove fungal and algal resistance requirements had been received but emphasized the need for further discussion with stakeholders during this meeting.

After addressing questions and comments from stakeholders, the project team moved on to Annex II, where the applicability of efficiency requirements to various categories of performance paints was presented. Stakeholders were asked for input on whether primers should be included in this annex and to clarify which types of waterproofing coatings should be included or excluded.

Finally, the project team presented the criterion referring to Annex III, which only includes requirements on spreading rate and efficiency in spraying. The project team highlighted that the current approach is too simple and requested further input from stakeholders to refine and expand the requirements.

On Annex I:

A Member State representative asked whether furniture paints are included in Annex I. The project team responded that it is unclear from the directive whether furniture paints fall within the scope, noting it as a grey area requiring clarification. They encouraged stakeholders to provide additional feedback if they have insights on this matter.

The representative further argued that furniture paints are likely out of scope but noted that many EU ecolabelled furniture paints are currently on the market. The project team explained that they would appreciate engaging with relevant license holders to discuss and gather opinions. They also clarified that the recent scope changes should not affect furniture paints: if they were previously included, they would remain included. Additionally, the project team mentioned that the Nordic Swan Ecolabel has separate criteria for furniture paints, which use different standards. Should furniture paints be formally included in the EUEL scope, the relevant standards may need to be incorporated.

An NGO representative stated that anti-fungal and anti-algal paints are beneficial for consumers if they meet the criteria and perform effectively. However, if these products require additional derogations, they should be excluded from the EUEL. The project team clarified that these paints do not require any additional derogations or special treatment under the proposed criteria.

On Annex II:

An industry stakeholder argued that the wet scrub resistance requirement in both Annex I and II is a property only relevant to indoor wall paints and therefore should not apply to other types of paints. In addition, the stakeholder further noted that primers and binding primers are used in both decorative and performance coatings and should therefore be included in both Annex I and Annex II. The project team acknowledged this feedback and proposed updating the criterion to clarify that the WSR requirement does not apply to outdoor paints or other coatings.

On Annex III:

No comments or questions were made to this section.

Point 7. Criterion 3: VOC and SVOC content (in draft Annexes I, II and III)

The project team presented the proposed changes to Criterion 3 for each annex, focusing on VOC and SVOC content limits.

In Annex I, the team introduced new limit values for VOC and SVOC content across different paint categories, which represent a 10% to 50% reduction from the existing limits. The team explained that these new limits were calculated using data received from five different Competent Bodies (CBs). The project team also discussed how many licenses would not meet the newly proposed limits and encouraged other CBs to submit more data to better shape the analysis.

After discussing the criterion for Annex I, the project team presented the new limit values for Annex II, where they emphasized the lack of data for anti-rust and waterproofing coatings. They highlighted the need for more data from CBs and license holders to ensure that the proposed limits are robust and accurately reflect the sector.

Finally, the project team presented the proposed Criterion 3 for Annex III and explained that, as water-based aerosol spray paints were newly included in the scope, no data was available from CBs. Therefore, the proposed limits were based on direct feedback from stakeholders. The project team encouraged further data submissions from stakeholders to establish a more realistic and reliable limit value for these products.

On Annex I:

An industry stakeholder expressed a better understanding of how the VOC and SVOC limits were calculated but raised concerns regarding category e), which had very few data points. The stakeholder questioned whether this data was sufficiently representative to justify the use of these limits. Additionally, the stakeholder noted that 4% to 24% of French products would no longer comply with the new limits. The stakeholder also inquired whether the project team had analysed the cumulative effects of the different requirements across criteria, to assess how many licenses would fail to comply with multiple requirements. The project team acknowledged that the data available was not sufficient and confirmed that only five CBs had provided data despite multiple requests. For categories lacking data, the project team used proxy data from similar categories to establish the limit values. The project team also confirmed that they had not analysed the effects of the new limits across multiple criteria.

The JRC highlighted the critical need for data from both CBs and license holders and encouraged license holders to share relevant data with the project team to improve the robustness of the analysis.

An NGO representative expressed support for the new limits, although data is scarce. The project team acknowledged this comment.

On Annex II:

No comments or questions were raised regarding Annex II.

On Annex III:

An NGO representative repeated that they revisited their position on including water-based aerosol spray paints within the scope of the EU EEL. They expressed concern that if such products carried the EU EEL, they would be prohibited for sale in California due to the stricter VOC limits in place there (50-80 g/L compared to the 300 g/L limit proposed for this revision). The project team asked the stakeholder to provide relevant legislation to better understand the California limits, as the current 300 g/L VOC limit was based on data from producers.

A Member State representative pointed out that VOC was the primary difference between water- and solvent-based aerosol spray paint in the LCA results. The project team responded by clarifying that VOC content in aerosol spray paints mainly comes from the propellant. Solvent-based aerosol paints typically have a VOC content of 600 g/L, while water-based aerosol paints have a lower VOC content of around 300 g/L.

Finally, the NGO representative asked whether the propellant had been included in the LCA studies of aerosol spray paints, to which the project team responded positively.

Point 8. Criterion 4: Restriction of hazardous substances and mixtures (in draft Annexes I, II and III)

The project team presented the main changes to criterion 4, which focused on the restriction of hazardous substances, applicable across all three annexes.

The project team introduced newly added definitions for 'impurities' and 'ingoing substances', which were missing from TR1, and clarified the distinction between the two.

The project team outlined the main proposed changes to SVHC and horizontal CLP restrictions. The latter received significant feedback after the 1st AHWG meeting. The project team asked CBs whether a standard CLP calculator is available to facilitate the process.

The project team provided a detailed overview of the derogations for various component types, including preservatives, corrosion inhibitors, and other miscellaneous components. They requested input from stakeholders on several issues that had arisen during the development of these derogations.

Finally, the team presented the proposed specific substance restrictions, which include new bans on organotin compounds, fragrances, certain bisphenol compounds and microplastics.

One stakeholder inquired whether microplastics would be banned with no specific limit. The project team clarified that microplastics will be banned as ingoing substance, meaning that the limits for these substances will apply.

A Member State representative stated they would submit further detailed comments but noted that certain derogations in the EU Ecolabel do not exist in the Nordic Swan ecolabel. In response, the project team explained that stakeholders were asked to provide input into these derogations three times and failed to do so. Therefore, the project team welcomed additional information on which derogations are considered necessary. The team also highlighted that the Nordic Swan and the EU Ecolabel cater to different climates: for example, paints intended for Southern Europe may need additional preservatives due to warmer climates, whereas the Nordic Swan ecolabel reflects different climatic conditions. The project team expressed they would welcome a cross-check with the Nordic Swan derogations for further alignment.

An NGO representative commented on the SVHC restrictions and the wording used, suggesting that the restrictions should not be limited to substances listed in the SVHC list but should also include any ingoing substance that the producer knows is hazardous.

In addition, the stakeholder further argued that instead of incentivizing the use of alternative ingredients in response to new hazards, the project team created new derogations. The project team acknowledged the comment on wording and requested input from stakeholders on what alternative compounds could replace those subject to restrictions. The team noted that they currently lack information on suitable alternative substances.

Point 9. Criterion 5: VOC emissions (in draft Annexes I, II and III)

The project team introduced the newly added criterion on VOC emissions for indoor products for Annexes I and II. The team explained that this criterion had been flagged in the previous revision of the EU Ecolabel and was already implemented by other ecolabels. Additionally, the proposal had received positive feedback from stakeholders during the 1st AHWG meeting.

The project team clarified that no changes had been made to the initial proposals presented in draft TR1. They also referred to a study in which 30 paints were tested for VOC emissions. The results indicated that most of the paints tested were below the proposed limits, suggesting that the limit values are feasible to comply with. However, the team noted that the study focused on the Danish market and that only 8 out of the 30 paints tested were EU ecolabelled.

Finally, the project team presented the principles and methodology for testing VOC emissions.

One industry stakeholder raised a concern about compounds that are both carcinogenic and have an R-value, asking how to evaluate these substances. The project team acknowledged the point as valid, indicating that it needed to be considered further. The team further added that in such cases, the compounds should be evaluated against both criteria — as carcinogenic and based on the R-value.

One NGO representative inquired if the SVOC limit was based solely on 30 paints tested and whether varnishes were excluded. They also mentioned that Nordic Swan did not include varnishes due to a lack of varnish data. The project team clarified that while the majority of the paints tested were indeed paints, some varnishes were included in the study.

Another NGO representative pointed out that in France, paints are only tested for one time period, and not both 3 and 28 days, and expressed concerns over the cost implications for companies to carry out testing for both time periods. Regarding the

proposed limit values, the stakeholder noted that while they are similar to those from other ecolabels, the formaldehyde limit in the proposal was not as ambitious as in some other labels.

The project team acknowledged the limited available data and invited stakeholders to submit any rationale for lowering the limits. The project team also noted the high testing costs, which influenced their decision to propose a 'worst-case approach', where producers can test only the worst-case formulation, which will apply to the entire paint family group.

Finally, another NGO representative expressed support for the new criterion and suggested that the VOC limit values could be further lowered.

Point 10. Criterion 6: Consumer information & Criterion 7: Information appearing on the EU Ecolabel (in draft Annexes I, II and III)

The project team briefly presented the proposed criteria for consumer information and information appearing on the EU Ecolabel for all three annexes. They noted that there were only a few changes from the TR1 draft.

Regarding consumer information, the project team highlighted that the availability of the information via a web-link or QR code, making it easier for consumers to access important details. For information appearing on the EU Ecolabel, the project team emphasised that there would be an inclusion of VOC emissions data, but only if relevant to the specific product category.

One NGO representative inquired about how the information available via QR code would complement the Digital Product Passport in the upcoming ESPR for paints and varnishes. The project team acknowledged that it is still unclear which specific information will be included in the DPP and how this information will be shared with consumers. They mentioned that it may be possible to integrate the information currently available via QR code with the DPP, however is still unknown if it will be possible to align the EU Ecolabel information with the DPP in the future.

Point 11. Other criteria – not included: CO₂ footprint, Biobased content, Microplastics

The project team provided a brief overview of the criteria that were not included in draft TR2, namely CO₂ footprint, biobased content and microplastics.

Regarding CO₂ footprint, the project team explained that although many stakeholders expressed support for including a CO₂ footprint criterion, it was not feasible at this stage due to a lack of data, limited industry readiness, and high costs for producers. However, they described the methodology that was considered for calculating the carbon footprint, including converting the carbon footprint per kg or L of paint to a carbon footprint per functional unit.

Regarding biobased content, the project team noted that this criterion was excluded due to the lack of proven environmental benefits associated with biobased paints.

Finally, the project team also addressed the exclusion of a requirement for microplastics, explaining that there is insufficient data on the unintentional release of microplastics due to weathering. Additionally, the industry is not yet prepared to meet this requirement. However, the team emphasized that should more data become available, the EU Ecolabel could consider implementing this criterion in a future revision.

One NGO representative asked why a requirement on microplastics was not included in this revision, noting that the French industry is already prepared to meet such a requirement. The project team explained that the lack of sufficient data to establish a limit value for microplastics is a key reason for the exclusion. Additionally, there are challenges with the test methods for this criterion, as the project team has not yet seen any reliable data or established test methods to support the implementation of such a requirement.

Another NGO representative inquired about the exclusion of biobased content, referencing a comparison study that highlighted the differences in health benefits between biobased and non-biobased paints. The representative also mentioned that traceability, which was previously an issue, is no longer a concern as the industry now has clear visibility on the source of the materials. The project team expressed interest in reviewing the comparison documentation and clarified that both carbon and other impact

categories would need to be considered. Additionally, the project team inquired about the traceability aspect and requested clarification on the relevant regulations. The stakeholder confirmed that the traceability regulation is the European Union Deforestation Regulation (EUDR), which applies to materials used in binders for biobased paints.

Point 12. Conclusions, next steps and closure of the meeting

The JRC concluded the meeting by thanking the participants for their attention, valuable input and help in identifying the key issues. Participants were reminded that written comments on the draft Technical Report 2 could be submitted via the BATIS platform, with the deadline set for 20 November.

The project team requested that stakeholders submit one comment per question when providing feedback through BATIS, to facilitate the review process.

It was also clarified that any further questions could be directed to JRC-B5-PAINTS@ec.europa.eu.

The presentation would be made available on both the website and the BATIS platform by 14 November, and the meeting minutes would be posted within two weeks. The 3rd draft of the criteria is expected in Q1 2025.

Once again, the JRC thanked all stakeholders for their participation, and the session was closed.

One Member State representative inquired about when the presentation would be available, as stakeholders only have one week to make final comments. The JRC replied that the presentation would be made available very soon, within one day.

End of the meeting.

Note to readers: A follow-up email was sent to stakeholders after the 2nd AHWG (i.e. on 14 November) informing about the online availability of the presentation used and available in the dedicated JRC website and BATIS: [2nd AHWG meeting EU Ecolabel paints presentation draft 13 Nov 2024.pdf](#) and [BATIS](#).