

COMMISSION DECISION

of **XXX**

establishing the EU Ecolabel criteria for decorative paints, varnishes and related products, performance coatings and related products, and water-based aerosol spray paints

(Text with EEA relevance)

THE EUROPEAN COMMISSION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Regulation (EC) No 66/2010 of the European Parliament and of the Council of 25 November 2009 on the EU Ecolabel ⁽¹⁾, and in particular Article 8(2) thereof,

After consulting the European Union Ecolabelling Board,

Whereas:

- (1) Under Regulation (EC) No 66/2010, the EU Ecolabel may be awarded to those products with a reduced environmental impact during their entire life cycle.
- (2) Regulation (EC) No 66/2010 provides that specific EU Ecolabel criteria are to be established according to product groups.
- (3) Commission Decision (EU) 2014/312 ⁽²⁾ established EU Ecolabel criteria and related assessment and verification requirements for the product group ‘indoor and outdoor paints and varnishes’. The period of validity of those criteria and requirements has been extended to 31 December 2025 by Commission Decision (EU) 2022/1229 ⁽³⁾.
- (4) In order to better reflect best practice in the market for the product group and to take account of policy developments, potential future windows of opportunity for increased uptake and the market’s demand for sustainable products, it is appropriate to establish a new set of criteria for decorative paints, varnishes and related products, and performance coatings and related products (previously called indoor and outdoor paints and varnishes). Another product with a market that is likely to grow, it is also appropriate to establish a set of criteria for water-based aerosol spray paints.

¹ Regulation (EC) 66/2010 of the European Parliament and of the Council of 25 November 2009 on the EU Ecolabel (OJ L 27, 30.1.2010, p. 1).

² Commission Decision of 28 May 2014 establishing the ecological criteria for the award of the EU Ecolabel for indoor and outdoor paints and varnishes (OJ L 164, 03.06.2014, p. 45–73).

³ Commission Decision (EU) 2022/1229 of 11 July 2022 amending Decisions 2014/312/EU, 2014/391/EU, 2014/763/EU, (EU) 2016/1332 and (EU) 2017/176 as regards the period of validity of the EU Ecolabel criteria and of the related assessment and verification requirements (OJ L 189, 18.07.2022, p. 20–23).

- (5) The EU Ecolabel Fitness Check Report ⁽⁴⁾ of 30 June 2017, reviewing the implementation of Regulation (EC) No 66/2010, concluded on the need to develop a more strategic approach for the EU Ecolabel, including the bundling of closely related product groups where appropriate.
- (6) In line with those conclusions and after consulting the EU Ecolabelling Board, it is appropriate to bundle the criteria for the product group ‘indoor and outdoor paints and varnishes’ and split it into two product groups ‘decorative paints, varnishes and related products’ and ‘performance coatings and related products’. The expansion of the scope to cover the product group ‘water-based aerosol spray paints’ is also included.
- (7) The New Circular Economy Action Plan for a cleaner and more competitive Europe ⁽⁵⁾ adopted on 11 March 2020 stipulates that the durability, energy and resource efficiency, and carbon and environmental footprint requirements are to be more systematically included in the EU Ecolabel criteria.
- (8) The revised EU Ecolabel criteria for decorative paints, varnishes and related products, performance coatings and related products, and water-based aerosol spray paints should aim to promote products that have limited environmental impact along their life cycle, and that are produced using material-efficient and energy-efficient processes. In particular, the revised EU Ecolabel criteria promote products that have limited impacts in terms of emissions to water and to air during production, emissions of volatile compounds during application and that may contain only a limited amount of hazardous substances. Moreover, in order to contribute towards the transition to a more circular economy, the criteria promote the efficient use of the product and how to deal with unused product. In the revision, appropriate attention was paid to the coherence between relevant EU policies, legislation and scientific evidence.
- (9) The new criteria and related assessment and verification requirements should remain valid until **31 December 2033**, taking into account the innovation cycle for the product group.
- (10) For reasons of legal certainty, Decision (EU) 2014/312 should be repealed.
- (11) A transitional period should be allowed for producers whose products have been awarded the EU Ecolabel for indoor and outdoor paints and varnishes on the basis of the criteria set out in Decision (EU) 2014/312, so that they have sufficient time to adapt their products to comply with the new criteria and requirements. For a limited period after adoption of this Decision, producers should also be allowed to submit applications based either on the criteria established by Decision (EU) 2014/312 or on the new criteria established by this Decision. EU Ecolabel licences awarded in accordance with the criteria set out in Decision (EU) 2014/312 should be allowed to be used for **twelve months** from the date of adoption of this Decision.
- (12) The measures provided for in this Decision are in accordance with the opinion of the Committee established by Article 16 of Regulation (EC) No 66/2010,

⁴ Report from the Commission to the European Parliament and the Council on the review of implementation of Regulation (EC) No 1221/2009 of the European Parliament and of the Council of 25 November 2009 on the voluntary participation by organisations in a Community eco-management and audit scheme (EMAS) and the Regulation (EC) No 66/2010 of the parliament and of the Council of 25 November 2009 on the EU Ecolabel (COM/2017/ 355 final).

⁵ Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, A new Circular Economy Action Plan for a cleaner and more competitive Europe (COM/2020/98 final).

HAS ADOPTED THIS DECISION:

Article 1

1. The product group ‘decorative paints, and varnishes and related products’ shall comprise indoor and outdoor paints, varnishes, wood stains and primers whose primary purpose is to impart decorative characteristics to buildings, their trim and fittings and associated structures and that fall under the scope of subcategories 1.1(a) to (h) in Annex I to Directive 2004/42/CE of the European Parliament and of the Council ⁽⁶⁾.

Decorative paint products shall include tinting bases and different colour shades achieved by tinting, either predefined by the manufacturer or at the customised request of consumers (professional or non-professional) to operators of tinting systems.

Decorative paints or varnishes not covered by Directive 2004/42/CE which are supplied in powder or granule form, and that are to be diluted and mixed with water prior to use for decorative purposes, are also included in the scope of this product group if marketed for use in line with one of subcategories 1.1(a) to (h) in Annex I to Directive 2004/42/CE.

2. The product group ‘decorative paints, varnishes and related products’ shall not include the following:

- a) performance coatings as defined in subcategories 1.1(i) and 1.1(j) of Annex I to Directive 2004/42/CE;
- b) multicoloured coatings defined in subcategory 1.1(k) of Annex I to Directive 2004/42/CE;
- c) decorative effect coatings defined in subcategory 1.1(l) of Annex I to Directive 2004/42/CE;
- d) anti-fouling coatings;
- e) wood preservatives;
- f) any other coating systems marketed as having antimicrobial, antibacterial, antiviral, disinfecting or other primary biocidal effects for the benefit of human health or related to hygiene standards in the food or drink industry, health services or any other sector, that extend beyond in-can preservation and preservation of the dry film (i.e. beyond biocidal product types 6 and 7 defined in Annex V to Regulation (EU) No 528/2012);
- g) coatings and coating systems designed for use in industrial processes, such as powder coatings applied as powders to substrates and coatings that are cured by UV radiation;
- h) coatings primarily intended for vehicles;
- i) wood oils and waxes;
- j) fillers, plasters, grouts, sealants and adhesives;
- k) cement-based paints where cement is used as a binder in the formulation;
- l) aerosol spray paints;
- m) road-marking paints.

⁶ Directive 2004/42/CE of the European Parliament and of the Council of 21 April 2004 on the limitation of emissions of volatile organic compounds due to the use of organic solvents in certain paints and varnishes and vehicle refinishing products and amending Directive 1999/13/EC (OJ L 143, 30.4.2004, p. 87).

Article 2

1. The product group ‘performance coatings and related products’ shall comprise certain one-pack and multi-pack performance coating products whose primary purpose is to impart special performance characteristics to buildings, their trim and fittings and associated structures and that fall under the scope of subcategories 1.1(i) and 1.1(j) in Annex I to Directive 2004/42/CE of the European Parliament and of the Council. The product group shall comprise floor coatings, anti-corrosion coatings, waterproofing coatings, radiator paints and any associated primers intended for use by consumers and professional users in buildings, their trim, fittings or associated structures.

2. The product group ‘performance coatings and related products’ shall not include the following:

- a) anti-fouling coatings;
- b) wood preservatives;
- c) any other coating systems marketed as having antimicrobial, antibacterial, antiviral, disinfecting or other primary biocidal effects for the benefit of human health or related to hygiene standards in the food or drink industry, health services or any other sector, that extend beyond in-can preservation and preservation of the dry film (i.e. beyond biocidal product types 6 and 7 defined in Annex V to Regulation (EU) No 528/2012);
- d) coatings and coating systems designed for use in industrial processes, such as powder coatings applied as powders to substrates and coating systems that are cured by UV radiation.
- e) coatings primarily intended for vehicles;
- f) wood oils and waxes;
- g) fillers, plasters, grouts, sealants and adhesives;
- h) cement-based paints where cement is used as a binder in the formulation;
- i) coatings designed to impart flame retardancy;
- j) coatings designed to impart graffiti resistance;
- k) road-marking paints.

Article 3

1. The product group ‘water-based aerosol spray paints’ shall comprise integral ready-to-use metal packages intended for use by consumers and professional users to impart decorative and/or special performance characteristics to buildings, their trim or fittings and associated structures.

The metal packages shall be equipped with a valve and a water-based paint formulation which is dispensed by pre-stored pressure in a controlled manner when the valve is operated.

2. The product group ‘water-based aerosol spray paints’ shall not include the following:

- a) aerosol spray paints with an organic solvent-based paint formulation;
- b) aerosol spray paints that would be classified as an extremely flammable aerosol (H222) or a flammable aerosol (H223) in accordance with the classification rules for mixtures set out in Regulation (EC) No 1272/2008;
- c) aerosol spray paints marketed as having antimicrobial, antibacterial, antiviral, disinfecting or other primary biocidal effects for the benefit of human health or related to hygiene standards in the food or drink industry, health services or any other sector, that extend beyond in-can

preservation and preservation of the dry film (i.e. beyond biocidal product types 6 and 7 defined in Annex V to Regulation (EU) No 528/2012).

Article 4

For the purposes of this Decision, the following definitions shall apply:

- (1) 'Aerosol spray paints' means aerosol dispensers which are non-refillable receptacles made of metal and containing a gas compressed, liquefied or dissolved under pressure, with a paint formulation, and fitted with a release device allowing the contents to be ejected as solid or liquid particles in suspension in a gas, as a paste or in a liquid state.
- (2) 'Alkylphenols and alkylphenol ethoxylates' means organic compounds obtained by the alkylation of phenols and the ethoxylation of alkylphenols, including all of the compounds listed in entry 43 to Annex XIV or entry 46 to Annex XVII of Regulation (EC) 1907/2006.
- (3) 'Anti-algal' refers to marketing claims for a coating product to prevent or reduce the growth of algae on the coating film that are supported by testing according to EN 15458.
- (4) 'Anti-fouling paint' means, according to ISO 4618:2014, coating material applied to the underwater sections of a ship's hull or to other underwater structures to discourage biological growth.
- (5) 'Anti-fungal' refers to marketing claims for a coating product to prevent or reduce the growth of mould or fungi on the coating surface that are supported by testing according to EN 15457.
- (6) 'Anti-microbial' or 'anti-bacterial' refers to marketing claims and the property of a coating material to inhibit or prevent the growth and proliferation of microorganisms or bacteria on its surface under conditions conducive to microbial colonisation. This term is considered to broadly encompass both preservative and disinfectant product types defined in Annex V to Regulation (EU) No 528/2012.
- (7) 'Anti-corrosion paints' means paints designed to prevent corrosion in metal substrates in the presence of oxygen and moisture, through the application of a protective coating.
- (8) 'Binding primers', according to Directive 2004/42/CE, means coatings designed to stabilise loose substrate particles or impart hydrophobic properties and/or to protect wood against blue stain.
- (9) 'Cement-based paints' means powdered paint products containing significant amounts of Portland cement or other cement in the formulation and which need to be carefully mixed with water prior to application.
- (10) 'Coatings for exterior walls of mineral substrate' means, according to Directive 2004/42/CE, coatings designed for application to outdoor walls of masonry, brick or stucco.
- (11) 'Cross-linking agent' means substances that facilitate the establishment of covalent or non-covalent (supramolecular) bonds between separate polymer chains or between non-neighbouring parts of the same polymer chain and thus modify the properties of the coating (e.g. drying, mechanical resistance, chemical resistance, adhesion).
- (12) 'Dead matt paints' are those which at an angle of incidence of 85 ° give a reflectance of < 5.
- (13) 'Decorative purpose' means treatments whose primary objective is to change or restore the appearance of a substrate.
- (14) 'Dry-film preservatives' are biocidal products within the meaning of Article 3(1)(a) of Regulation (EU) No 528/2012 that are for use in product type 7 as described in Annex V to that Regulation. They are used for the preservation of films or coatings by the control of

microbial deterioration or algal growth in order to protect the initial properties of the surface of materials or objects. (15) 'Elastomeric paint' means a paint product designed to provide a high-quality decorative and protective finish for masonry surfaces by bridging and sealing cracks in the substrate and that, by means of its elastic properties and the use of thicker applied films, can stretch and shrink with thermally driven building movement, thus improving the durability of the underlying masonry material.

(16) 'Filler' means, according to ISO 4618:2014, a coating material with a high proportion of extender, intended primarily to even out irregularities in substrates to be painted and to improve surface appearance.

(17) 'Final product' means decorative paints, varnishes or related products; performance coatings or related products; and water-based aerosol spray paints that are awarded the EU Ecolabel, in the form in which they are sold to customers.

(18) 'Floor coatings and floor paints' means coatings and paints specifically formulated to be applied to flooring, with the purpose of protecting and/or colouring the flooring substrate.

(19) 'Gloss paints' means paints which, at an angle of incidence of 60°, give a reflectance of ≥ 60 .

(20) 'Impurities' means unintended constituents (residuals, pollutants, contaminants, by-products, etc.) that remain in the EU ecolabelled product in concentrations less than 100 ppm (0,0100 % w/w, 100 mg/kg) or that remain in the supplied ingredient or raw material in concentrations less than 1 000 ppm (0,100 % w/w, 1 000 mg/kg). Any unintended constituents present above these respective limits for the EU ecolabelled product or the supplied ingredient or raw material shall instead be considered as ingoing substances.

(21) 'In-can preservatives' are biocidal products within the meaning of Article 3(1)(a) of Regulation (EU) No 528/2012 that are for use in product type 6 as described in Annex V to that Regulation, in particular for the preservation of manufactured products during storage by the control of microbial deterioration to ensure their shelf life and used for the preservation of tints that will be dispensed from machines.

(22) 'Ingoing substances' means constituents (as pure substances or as part of a mixture, and regardless of the amount) that are intentionally added to the final product or its ingredients to achieve or influence certain properties of the final product or its ingredients. Substances known to be released from ingoing substances after addition (e.g. formaldehyde from preservatives and arylamine from azodyes and azopigments) shall also be regarded as ingoing substances. Impurities present in the final product or its ingredients in concentrations above the limits permitted for being considered as impurities shall instead be considered as ingoing substances.

(23) 'Interior/exterior trim and cladding paints for wood, metal or plastic', according to subcategory 1.1(d) of Directive 2004/42/CE, means coatings designed for application to trim and cladding which produce an opaque film. These coatings are designed for either a wood, metal or plastic substrate.

(24) 'Interior/exterior trim varnishes and wood stains', according to subcategory 1.1(e) of Directive 2004/42/CE, means coatings designed for application to trim which produce a transparent or semi-transparent film for decoration and protection of wood, metal and plastics.

(25) 'Just add water decorative paints or varnishes' means paints or varnishes that are supplied in powder form, which do not use cement binders and which simply need to be mixed with water prior to their use as any one of the categories defined in subcategories 1.1(a) to 1.1(h) in Annex I to Directive 2004/42/CE.

(26) 'Lasure', according to ISO 4618:2014, means a coating material containing small amounts of a suitable pigment and/or extender and used to form a transparent or semi-transparent film for decoration and/or protection of the substrate.

(27) 'Light-coloured paint', according to ISO 6504-1:2019 and ISO 6504-3:2019, means a coating with tristimulus values Y and Y10 greater than 25, measured with a spectrophotometer on a black and white substrate.

(28) 'Masonry coating' means a coating that produces a decorative and protective film for use on concrete, paintable brickwork, blockwork, rendering, calcium silicate board or fibre-reinforced cement.

(29) 'Matt or glossy coatings for interior walls and ceilings' means coatings designed for application to indoor walls and ceilings, which deliver a dead matt, matt, semi-matt, satin, semi-gloss or gloss finish.

(30) 'Matt paints' are those which at an angle of incidence of 85° show a reflectance of < 10 and ≥ 5 .

(31) 'Mid-sheen paints' (also referred to as semi-gloss, satin, semi-matt) are those which at an angle of incidence of 60° or of 85° show a reflectance of < 60 and ≥ 10 .

(32) 'Minimal build wood stains', according to Directive 2004/42/CE, means wood stains which, in accordance with EN 927-1:1996, have a mean thickness of less than $5 \mu\text{m}$ when tested according to ISO 2808:1997, method 5A.

(33) 'Mixture', according to Regulation (EC) No 1907/2006 of the European Parliament and of the Council, means a mixture or solution composed of two or more substances;

(34) 'Multi-pack performance coatings', according to Directive 2004/42/CE, means coatings with the same use as one-performance coatings, but with a second component (e.g. tertiary amines) added prior to application.

(35) 'Neutralising agent' means a chemical substance or material added to coating formulations that acts as a Bronsted base, Bronsted acid, Lewis base or Lewis acid in order to stabilise the pH of the coating formulation and prevent unwanted reactions or degradations during production, storage and application that would adversely affect the properties of the coating product and the resulting dry-film.

(36) 'One-pack performance coatings', according to Directive 2004/42/CE, means performance coatings based on film-forming material, which are designed for applications requiring a special performance, such as primers and topcoats for plastics, primer coats for ferrous substrates, primer coats for reactive metals such as zinc and aluminium; anticorrosion finishes; floor coatings, including for wood and cement floors; graffiti resistance; flame retardant; and hygiene standards in the food or drink industry or health services.

(37) 'Opaque' means a film with a contrast ratio of $\geq 98\%$ at $120 \mu\text{m}$ wet film thickness.

(38) 'Organotin compounds' means any organometallic compound with at least one Sn-C covalent bond.

(39) 'Paint' means a pigmented coating material, supplied in a liquid, paste or powder form, which, when applied to a substrate, forms an opaque film having protective, decorative or specific technical properties and after application dries to a solid, adherent and protective coating.

(40) 'PFAS' means per- and polyfluoroalkyl substances (PFASs) defined as: any substance that contains at least one fully fluorinated methyl (CF_3 -) or methylene ($-\text{CF}_2$ -) carbon atom (without any H/Cl/Br/I attached to it).

- (41) 'Phthalates' means esters of phthalic acid / orthophthalic acid / phthalic acid / 1,2- benzene dicarboxylic acid.
- (42) 'Plaster' means premixed materials designed for plastering of interior or exterior walls and ceilings, including gypsum plasters according to EN 13279, solvent-free pasty plasters according to EN 15824, masonry mortars according to EN 998-1 and structural wall paints designed for use indoors as internal plaster with a thickness of > 400 µm and/or a minimum coverage of < 2m²/l.
- (43) 'Powder coating' means protective or decorative coating formed by the application of a coating powder to a substrate and fusion to give a continuous film.
- (44) 'Primers', according to Directive 2004/42/CE, means coatings with sealing and/or blocking properties designed for use on wood or walls and ceilings.
- (45) 'Road-marking paints' means, in accordance with EN 1436, paints that form a part of the means for horizontal signage and require a functional component to provide road safety.
- (46) 'Semi-volatile organic compounds' (SVOCs), for the purpose of calculating the SVOC content of decorative paints, varnishes or related products or performance coatings and related products, means any organic compound having a boiling point greater than 250 °C and less than 370 °C, measured at a standard pressure of 101,3 kPa.
- (47) 'Substance', according to Regulation (EC) No 1907/2006 of the European Parliament and of the Council, means a chemical element and its compounds in the natural state or obtained by any manufacturing process, including any additive necessary to preserve its stability and any impurity deriving from the process used, but excluding any solvent which may be separated without affecting the stability of the substance or changing its composition.
- (48) 'Transparent' and 'semi-transparent' mean a film with a contrast ratio of < 98 % at 120 µm wet film thickness.
- (49) 'Tinting system' means a method for preparing coloured paints by mixing a 'base' with colour tint.
- (50) 'Trim and cladding' are building elements with functional and aesthetic roles. Trim refers to finishing materials around edges or openings, such as doors and windows, that are used to conceal joints, protect surfaces and enhance design. Cladding is the application of one material over another in a building in order to provide protection of the underlying material, improve building envelope insulation and/or contribute to visual appeal.
- (51) 'Tri-stimulus values', according to ISO 11664-1:2019, means the amount of reference colour stimuli, in a given trichromatic system, required to match the colour of the stimulus considered. In the CIE standard colorimetric systems (e.g. CIE 1931 and CIE 1964) the tristimulus values are represented, for example, by the symbols R, G, B; X, Y, Z; R₁₀, G₁₀, B₁₀, or X₁₀, Y₁₀, Z₁₀.
- (52) 'Undercoat' is a preparatory layer applied before the final coat of paint or varnish, aimed at improving adhesion, levelling the surface, sealing porosities, colour perception for darker shades and/or providing additional protection to the substrate.
- (53) 'UV curable paint system' means the hardening of coating materials by exposure to artificial ultra-violet radiation.
- (54) 'Varnish' means a clear coating material which, when applied to a substrate, forms a solid transparent film having protective, decorative or specific technical properties and after application dries to a solid, adherent and protective coating.
- (55) 'Volatile organic compounds' (VOCs), for the purpose of calculating the VOC content of decorative paints, varnishes or related products or performance coatings and related products,

means any organic compounds having an initial boiling point less than or equal to 250 °C measured at a standard pressure of 101,3kPa.

(56) 'Waterproofing coatings' means coating products and systems (including any primers and undercoats) applied in liquid form to seal roof surfaces (including green roofs), interior or exterior floor surfaces in a building and building elements in contact with soil.

(57) 'Waxes' means a group of organic compounds that are typically solid at room temperature and become malleable or liquid upon heating.

(58) 'Wood oils' means oils used for the care and protection of wood (e.g. pearling effect) without any cleaning action.

(59) 'Wood preservative', according to ISO 4618:2024, means a product containing a biocide which is intended to inhibit the development of wood-destroying and/or wood-staining organisms in the wood to which it is applied.

(60) 'Wood stain', according to ISO 4618:2024, means a penetrating composition containing a dyestuff that changes the colour of a wood surface, usually transparent and leaving no surface film, the solvent for which may be oil, denatured alcohol or water.

Article 5

1. In order for a product to be awarded the EU Ecolabel under Regulation (EC) No 66/2010 for the product group 'decorative paints, varnishes and related products', it shall fall within the definition of that product group as specified in Article 1 of this Decision, and shall comply with the respective criteria and related assessment and requirements set out in Annex I to this Decision.

2. In order for a product to be awarded the EU Ecolabel under Regulation (EC) No 66/2010 for the product group 'performance coatings and related products', it shall fall within the definition of that product group as specified in Article 2 of this Decision and shall comply with the respective criteria and related assessment and verification requirements set out in Annex II to this Decision.

2. In order for a product to be awarded the EU Ecolabel under Regulation (EC) No 66/2010 for the product group 'water-based aerosol spray paints', it shall fall within the definition of that product group as specified in Article 3 of this Decision and shall comply with the respective criteria and related assessment and verification requirements set out in Annex III to this Decision.

Article 6

The EU Ecolabel criteria for the product group 'decorative paints, varnishes and related products', for the product group 'performance coatings and related products', and for the

product group ‘water-based aerosol spray paints’ and the related assessment and verification requirements shall be valid **until 31 December 2033**.

Article 7

1. For administrative purposes, the code number assigned to the product group ‘decorative paints, varnishes and related products’ shall be ‘044’.
2. For administrative purposes, the code number assigned to the product group ‘performance coatings and related products’ shall be ‘056’.
3. For administrative purposes, the code number assigned to the product group ‘water-based aerosol spray paints’ shall be ‘057’.

Article 8

Decision 2014/312/EU is repealed.

Article 9

1. Notwithstanding Article 8, applications submitted before the date of adoption of this Decision for the EU Ecolabel for the product group ‘indoor and outdoor paints and varnishes’, as defined in Decision 2014/312/EU shall be evaluated in accordance with the conditions laid down in that Decision.
2. Applications for the EU Ecolabel for products falling within the product group ‘indoor and outdoor paints and varnishes’ submitted on or within two months from the date of adoption of this Decision may be based either on the criteria set out in this Decision, or on the criteria set out in Decision 2014/312/EU. Those applications shall be evaluated in accordance with the criteria on which they are based.
3. EU Ecolabel licences awarded on the basis of an application evaluated in accordance with the criteria set out in Decision 2014/312/EU may be used for **twelve months** from the date of adoption of this Decision.

Article 10

This Decision is addressed to the Member States.

Done at Brussels, **day Month 2025**.

For the Commission

XXX

Member of the Commission