EU Ecolabel for paints and varnishes: Stakeholder table of comments

21/10/2013 v1

Reference	Criteria or subject	Aggregated theme	Summary of stakeholder comments	JRC-IPTS response	Accepted, rejected or modified?
Assessment and verification	**0.01% cut-off limit**	Feasibility of complying	Disclosure of the exact formulation and possible impurities down to 100ppm is disproportionate and is not feasible. 0.10% was proposed as being more appropriate.	0.01% is an agreed threshold for Ecolabelled products that are chemical mixtures. The requirement is not open ended. The ingredients that are to be verified are specified, including those that may be below 0.10% and below 0.010%, as is the case for in-can preservatives <0.060% and within that substance group MIT/BIT <0.0150%.	Rejected
		Intellectual property issue	Exact formulations are the subject of intellectual property. Suppliers of raw materials will never provide all the information written in (c) to the applicants. Verification on the basis of a declaration supported by SDS and/or CLP classifications should be accepted. It is not acceptable to give the trade name of an ingredient added.	A clause has been added stating that Competent Bodies may allow verification on the basis of SDS and/or CLP classifications. It is also proposed that only the classification for the ingoing mixture is required for verification purposes.	Modified
	Procedure for changing suppliers		Criteria should specify the procedure for obtaining approval for changing suppliers of ingredients, or changing the ingredients, after the application has been approved.	This is a matter for the User Manual and for agreement between Competent Bodies.	-
1. White pigment and WSR	**1a/b linkage**	Linking together former criteria on white pigment and Wet Scrub Resistance	The link will exclude high quality matt paints. Allowing ceiling paints to pass with only 25 g/m2 of white pigment will mean that more paint is used as more layers will be needed.	It is proposed to retain the exemption unless evidence to support this claim is brought forward.	Rejected
	1b. Minimum requirements for WSR	Exempted paints should achieve a WSR of 3	Indoor paints with a white pigment content of 25 g/m2 should achieve a WSR of 3. Those with a worse WSR cannot be considered to be a reduced impact product	The 25 g/m2 is intended as an exemption for products for which *no claim is made* but which minimise their titannium dioxide content.	Clarification
		Labelling that WSR testing has not been carried out.	Manufacturers should not be required to inform the consumer that the product has not been subjected to WSR testing.	The requirement has been deleted and replaced by a requirement that 'Only WSR class 1 and 2 ecolabelled paints may claim wet scrub resistance on the label or other marketing documentation.' This is intended to create a more positive incentive for better performance.	Accepted
		Application to the worst case only - tinting bases.	The requirement should only apply to the worst case from the paint range i.e. the tinting base only	A statement has been added that the WSR requirement applies only to tinting bases.	Accepted
	Assessment and verification	Acceptance of in-house testing	Clarification is required as to where it is stated that in-house testing is accepted.	Assessment and verification, Clause (a) states that 'verifications performed by bodies which are accredited under the EN 45011 standard' shall be preferentially accepted but it does not exclude in-house testing.	Clarification
2. Titanium dioxide pigment	**Assessment and verification**	Role of TiO2 producer	Make clear that all supporting documentation are supplied by TiO2 producer.	The assessment and verification wording has been revised accordingly.	Accepted

3. Efficiency in use	**3a. Spreading rate**	Relevance of spreading rate	Requirement for spreading rate should not be compulsory for primers. These might have other functionality than hiding.	The criteria is intended to recognise products that are more efficient. The requirement is varied depending on the opacity of primers (and therefore also hiding power).	Clarification
	3c. Adhesion	Adhesion for masonry paint and primers	Adhesion for masonry paint and primers according to EN 26624 should be 1,5 Mpa	The criteria is aligned with the test method as specified	Accepted
		Adhesion for trim & cladding (only undercoats for wood & metal) and floor coverings	Adhesion for trim & cladding (only undercoats for wood & metal) and floor coverings EN ISO 2409 should be Score 2.	The criteria is aligned with the test method as specified	Accepted
	3e. Weathering	Scope of testing required	Tests should only be performed on tinted paints; one white, one semi dark and one dark, to get a good evaluation for color difference and chalking.	It is understood that the requirement of ΔE*=4 was determined for the tinting base. Information is not currently available in order to set a requirement that would be suitable for selected tints. There is also concern about the cost of testing.	Modified
		Time period used for testing	Why has the requirement been reduced to 1000 hours from 2000 hours. For outdoor paints this test is important.	1000 hours was the consensus view from the stakeholder group on a representative testing duration. This represents an increase of 100% on the current criteria.	Clarification
	3h. Fungal resistance	Claims regulated under the BPR	Claims for fungal resistance can only refer to the property of the paint, not protection of the substrate, because of the biocidal regulations.	A reference has been added to the properties of the paint and in accordance with PT7 of the Biocide Regulation.	Accepted
		Test methods to be used.	Test method for wood: 927-3 for wood, and approved level should be rating 0 according to ISO 4628-1. Allow equivalent methods.	The test method has been changed to EN 15457 in-line with the BD/BPR which it is understood to support.	Accepted
		Additional of algal resistance	The test should be aligned with those developed to support the BD/BPR. Additionally PT7 also addresses algal resistance for which an EN standard was also developed.	The test method has been changed to EN 15457 in-line with the BD/BPR which it is understood to support. Algal resistance has also now been added with reference to EN 15458.	Accepted
		Identification of paint to be tested	It is difficult to define a representative tinted paint. It is proposed to adopt the following “Due to the large number of possible tinting colours, this criterion will be restricted to the testing of the base paint”	The proposal has been adopted accordingly.	Accepted
4. VOC's and SVOC's	**VOC content**	VOC content limits	There is no technical justification in Southern Europe for VOC levels higher than 5-10 g/l.	This position has been repeatedly stated by large manufacturers with substantial experience of low VOC paint reformulation. The feedback from stakeholders is, however, contradictory on this issue. Sample product data from two Southern European Competent Bodies appears to support this position.	Modified
			Several technologies are available to achieve less than 5-10 g/l and are used on a large industrial scale. Furthermore the market in some countries, e.g. France, will expect lower levels in order to maintain the reputation of the Ecolabel.	The performance of and communication of the Ecolabel in countries where low VOC content is now a market expectation is considered to be important, but equally the Ecolabel must be applicable in other less mature markets. It is therefore proposed that low VOC content can be communicated alongside the label.	Modified

			A total (VOC + SVOC) of 15 to 20 g/l would be more than sufficient for Interior matt paints. There is no technical justification to allow higher SVOC values than VOC limits.	This position has been repeatedly stated by large manufacturers with substantial experience of low VOC paint reformulation. The feedback from stakeholders is, however, contradictory on this issue. Sample product data from two Southern European Competent Bodies appears to contradict this position.	Rejected
			The proposed VOC limit of 12 (matt walls/ceilings, primers, binding primers) is too strict for southern Europe.	This position has been repeatedly stated by large manufacturers with substantial experience of low VOC paint reformulation. The feedback from stakeholders is, however, contradictory on this issue. Sample product data from two Southern European Competent Bodies appears to contradict this position.	Rejected
			There is no argument for implementing the change from 15 to 12 g/L VOC for Interior matt walls and ceilings (Gloss <25@60°C), Primers and Binding primers. The small environmental gain cannot be compared to the high cost burden.	The VOC content of paint was highlighted by the preliminary technical analysis as being a key environmental hot spot. An improvement is justified because the majority of licenseholders fall within the three relevant sub-categories and these are understood to represent a substantial proportion of EU paint sales. Given, however, that this is the lowest VOC sub-category the gain should be maximised to achieve the greatest cumulative benefit in the market.	Modified
		Product VOC labelling	It was suggested that applicants be able to communicate low VOC levels to consumers, following the example of existing industry labels.	Text is proposed alongside the label which would allow for the communication of reduced (compliance with the criteria) and low (at the low end of criteria compliance) VOC levels. Difference reference points were considered. The French system has a threshold of 3g/l for low VOC paint. A voluntary industry scheme that is widely used (initiated by B&Q in the UK) has 80 g/l as a threshold. ISO 11890-2 and 17895 are differentiated at 1.0 g/l.	Accepted
		Assessment and verification	Self-declaration by calculation should be possible for VOC's and SVOC's	Given that this criteria has been in place through several revisions and experience has been buit up it is proposed to retain calculation as an option. However, in line with the proposed introduction of analytical testing for SVOC's it is also proposed to recognise/accept the two relevant ISO standards 11890-2 and 17895.	Modified
			The method proposed for verification of SVOC (CEN/TS 16516) is not applicable for in can measurements.	Accepted, it relates to air emissions whereas the focus of the criteria is on paint/varnish content.	Accepted
	SVOC content	Definition of SVOC's	With an SVOC definition of n-hexadecane to n-docosane. As a result key substances would not be addressed because there is a gap between 250°c and 287°C	The reference temperature range has been harmonised with Directive 2004/42/EC with 250^{o}C as the boundary between VOC and SVOC. The marker compounds have then been specified accordingly.	Accepted

			According to Directive 2004/42/EC, VOC means any organic compounds having an initial boiling point less than or equal to 250 °C/ 101,3 kPa. As a result SVOC's should be defined as having a boiling point > 250°C (> C14 Tetradecan)		Accepted
			These compounds are complicated to identify, a list of the substance groups that are targeted here would help, as per the Blue Angel and AgBB (Germany).	The SVOC proposal would be new to the Ecolabel and most industry stakeholders. Concerns have been raised throughout the revision process as to the complexity of introducing this sub-criteria and the limited industry experience. There is very limited coverage of SVOC's by labelling schemes and those that do (e.g. Blue Angel) are very complex/difficult to operate (e.g. Blue Angel has a panel of experts to oversee the criteria and test method). In order to keep the proposal as simple as possible a quantitative approach is proposed. This position can be reviewed once more experience has been gained by licenseholders and Competent Bodies.	Rejected
		Content limit values	Limit values of 50 g/L for interior paints and 60 g/L for exterior paints should give paint manufacturers a chance to map their SVOCs and work with suppliers.	The limit values have been formulated by reference to the upper and mid-range values submitted by stakeholder manufacturers. These related to specific types/groups of paints and have been used to set two broad bands of performance 30-40 and 50-60g/l.	Modified
			The SVOC Limits are very, very high compared with, for example, the Blue Angel (UZ12a: 0,1 – 0,3% depending on solid content).	Contradictory evidence was received about the workability of different limit values and the relationship between VOC and SVOC levels. The Blue Angel values are for very low VOC paint and there are now reference values for mid-low VOC content paint.	Rejected
			SVOC emissions do not increase in function of reductions in VOC emissions. They can include a range of substances selected for different functional reasons.	Contradictory evidence was received from industry on this issue. However, in the light of the functional issues highlighted in evidence (e.g. open time requirement to ensure paint quality, the need to use different binders) a conservative proposal has been formulated.	Modified
			Both the VOC and SVOC limits should ensure sufficient open-time for the paint in order to get a good end result.	Given the functional issues identified a conservative proposal has been formulated. The issue should be revisited at the time of the next revision.	Accepted
		Specification of the test method	The criteria confuses VOC content with VOC emissions. The new test standard EN 16516 is a method to determine emissions to indoor air.	The criteria has been revised to clarify the focus on VOC and SVOC content. Reference is now only made to content-related test methods.	Accepted
			An analytical method is required for SVOC's. It is proposed to extend the use of ISO 11890 with retention times for SVOC's in the range of >C14 to C22 (based on the definition in CEN 16516)	An approach based on the use of Gas Chromatography was the consensus proposal by industry stakeholders. It is proposed to use this as the basis for verification and for experience with its use, and the status of any standardisation initiatives, to be reviewed at the time of the next revision.	Accepted

			The ISO 11890 method is not used for SVOC evaluation. At the moment there is no standardised method to measure SVOC content.	It is understood from industry stakeholders, including a major testing body, that this could be used in the interim as the verification method.	Modified
		Combined VOC/SVOC limits	Combined VOC/SVOC limits should have been proposed earlier in the revision process.	Accepted, a simplified proposal based on sum content is to be proposed.	Accepted
		Assessment and verification	Self-declaration by calculation should be possible for VOC's and SVOC's	This would not be applicable to SVOC's because of the complexity of identifying SVOC compounds within the paint formulation. It is understood that information available from raw material suppliers may not be of sufficient detail for this to be workable.	Modified
			A test method for SVOC's would be preferable because of difficulties obtaining information from manufacturers and in defining boiling points for substances e.g. mineral oils.	A test method is proposed in accordance with the potential difficulties raised.	Accepted
5. Hazardous substances	**(a) Overall restrictions that apply to hazard classifications and risk phrases**	Substance group approach to derogations	By derogating whole groups of substances, the ecolabel will not be a driving force to improve the environmental aspects of individual substances. A system should be used where individual substances are granted derogation only if a manufacturer documents that other tested substances are not sufficient	The substance group approach was introduced because of the consensus view of stakeholders in the September 2012 consultation round that the substance derogations were too complex and inflexible. Many different combinations of substances are used in formulations and not all possible ingredients can be captured by the derogation process. Some general rules are also needed e.g. given the limited scope for substitution of biocides. As far as possible derogations have been made that contain specific conditions and which are related to required functions that ensure the quality of the product and/or support specific applications. It is anticipated that with the information gathered from licenseholders this approach will provide a better overall picture of the hazard profile and substitution potential for ecolabelled paint formulations.	Clarification
		Differentiated sum totals for aquatic hazards	Differentiated sum totals for aquatic hazard classifications were proposed. Without restrictions on the limit values for hazards such as H400 and H411 there would be potential for significant sum totals for these classifications.	It should be noted that the on mixture classifications the criteria is now stricter, with H412 and H413 classifications added. A proposal based on the DSD classification rules and the Nordic Swan criteria were reviewed earlier in the revision process and discounted by stakeholders because of their complexity. Instead substance-group restrictions limit concentrations as far as practically possible. It may then be possible to obtain a clearer picture of overall formulations at the time of the next revision.	Modified
		Classification of mixtures	Is it possible to verify an ingoing mixture instead of the substances in that mixture? Explain when a mixture should be assessed rather than a substance.	It is proposed that, in order to ensure that verification is workable, that the classification for ingoing mixtures be accepted (as is permitted in Article 6(6) of the Ecolabel Regulation).	Accepted
	(b) Restrictions that apply to Substances of Very High Concern	Threshold limit of 0.1%	The threshold of 0.01% should also apply to SVHC/Candidate List substances.	The threshold of 0.10% is a horizontal requirement across ecolabelled products and also corresponds to the thresholds for notification to ECHA.	Rejected

	Nanomaterials	General approach	Nanomaterials should be banned from ecolabelled paints and varnishes. An assessment framework for their toxicological and ecotoxicological characteristics is not yet in place. Manufacturers should have to prove that they are safe to use.	A general ban is not possible at present for the EU Ecolabel. A clause has been added to the assessment and verification requirements requiring disclosure for ingredients that are nanomaterials according to the European Commissions proposed definition 2011/696/EU. This	Rejected
		Definition of nanomaterials	The European Commission's definition of October 2011 encompasses almost all pigments, fillers, additives and possibly even dispersions. Labelling should only apply on a precautionary principle where there are indications of real risk.	The European Commissions proposed definition 2011/696/EU has been used for the purposes of disclosure by applicants. This includes reference to the particle size distribution.	Modified
	Assessment and verification	Evidence that ingredients are not classified	Because there is no obligation under REACH ingredient manufacturers may not be able to provide this information unless it already appears on an SDS. For mixtures SDS is currently voluntary.	The EU Ecolabel aims to provide assurance to consumers and is a voluntary scheme intended to reflect the practices of the best manufacturers on the market. This shall include, as far as practically possible, checking for the presence of hazards in the paint formula.	Clarification
Appendix 1	**1(a-c) Preservatives**	General approach to derogations	The biocide which are allowed could be named, for example : BIT, MIT, IPBC, Bronopol, terbuthrine	It was the consensus view of stakeholders from the September 2012 consultation round that a group approach be taken. Biocides have been named where specific derogation conditions apply.	Modified
			The hazard classifications R24 (H311), R23 (H331), H301 (R25), H373 (R48/20) are required to be derogated to support paint preservation. If these are not included it would exclude MIT and CMI/MI isothiazolinones.	The Ecolabel Regulation (EC) No 66/2010 requires that inherent hazards associated with ingredients are minimised in addition to the overall mixture classification requirements. The group derogations were created from the common hazard profiles of biocides on the original derogation list. It is proposed that these hazards shall only be derogated for specific biocides for which the need is justified. The classifications have been checked as far as possible to reflect the specific hazards associated with each biocide.	Modified
		Precautionary restriction on H400/H410 hazards	The statement on preservatives that have been authorised but are classified with H400/H410 contradicts the derogations. Flexibility is required because very few preservatives have been approved under PT6/7	It is accepted that these derogations are required to support the use of preservatives and that flexibility is required. Given that conditions may be placed on the use of biocides classified with H400 and H410 as these are technically restricted by the Regulation it is proposed that a clause is added stating that: 'for which a risk assessment for professional and/or amateur (non-professional) use is provided in the Assessment Report.' Taking the example of DCOIT it can be seen that authorisation was granted accepting that a risk assessment was not carried out, despite significant authorisation conditions for its use in an industrial setting.	Accepted
		Isothiazolinone preservatives	The 15ppm CIT/MIT limit value should be listed.	CIT/MIT is restricted at 15ppm because this would trigger labelling of the product with H317. The value has now been listed in Appendix 1.	Accepted
			The MIT concentration limit should be reduced to 250ppm (0.025%)	MIT does not require additional specific hazard derogations to BIT (in-can preservation). It is possible that MIT, BIT and OIT could be subject to tighter specific limits in colourants but this would limit flexibility of formulation.	Modified

			There is not sufficient technical knowledge as to whether EUH208 labelling can be avoided. It would only be possible at very low isothiazolinone concentrations, which would then require substitution with formaldehyde donors in order to protect the product.	It is accepted that, based on the information gathered during this revision, EUH208 would be too restrictive and could have unintended consequence of supporting the use of formaldehyde donors.	Accepted
		Formaldehyde donors	The specific donors permitted shall be listed. Testing is a burden for applicants.	The general principle of testing has been commented on stakeholders and the burden has been minimised by selecting a low cost test for the 10ppm limit value. The higher limit value of 100ppm requires a stricter verification because formaldehyde is to be reclassified as H350. It is proposed to give applicants flexibility to choose donors.	Rejected
		Assessment and verification	Verification should cover all ingredients since raw materials often contain preservatives. Colourants were specifically proposed, as they may be added up to 10% to base paint.	It is considered that an open ended verification requirement for raw materials would not be workable as the concentrations have been determined for the main contributors - the preservative and binders. Based on new information from industry it is proposed to add a separate requirement for colourants.	Rejected
		Derogation of stabilisers	Zinc oxide stabilizer should be derogated, as already for corrosion inhibition. Zinc pyrithion and BIT cannot be used without a stabilizer. A limit value of between 0.1-0.05% is proposed.	Given that these preservatives were derogated earlier in the process and are considered to be important ingredients it is proposed to introduce a specific derogation for stabilisers to support zinc pyrithion and BIT use only.	Accepted
	1(a) In-can preservatives	Preservation of colourants in tinting machines	Colourants require specifically addressing as they require specific combinations of preservatives to protect them whilst stored in dispensing machines in shops. Indicative minimum preservative contents for low VOC (<50 g/l) and very low VOC (<0.7 g/l) tints were provided. A combination of IPBC (0.1%), CIT/MIT (0.015%) and other isothiazolinones (0.08 – 0.10%) are required.	A new sub-section of the preservative restrictions has been created. This specifies the sum total of preservatives that may be used to protect colourants in tinting machines. The sum total contribution of isothiazolinones requested was checked further to ensure it is the minimum required.	Accepted
	1(c) Dry film preservatives	General approach	Which products may contain film preservatives? The phrase: *all products unless specified otherwise in this context requires clarifying*	All products with the exception of indoor paints may contain dry film preservatives.	Clarification
		Restriction of indoor paints	Dry film preservatives should not be permitted for indoor paints. Moreover, they are not required to protect indoor paints, with the exception of kitchens/wet rooms.	This feedback was received from a number of industry stakeholders and Member States. A new condition has been added restricting their use for indoor paints with the exception of paints with specific application in damp conditions i.e. kitchens and wet rooms.	Accepted
		Should the sum total include derogations?	Clarify the derogation on IPBC and isothiazolinone compounds - can the derogated limit values be added to the sum limit values?	Feedback was received that the limit values for outdoor paints are too low for wood preservation. In this case only the values may be summed.	Clarification
		Outdoor paint preservatives	The sum totals for outdoor paints need to be higher to support wood preservation. Sum totals between 0.6 - 0.75% were proposed. Permitting only IPBC is too limited.	The derogation for wood paint application of IPBC has been amended to allow a sum total of 0.65 based on a 0.45 IPBC concentration in combination with 0.2 of selected other preservatives.	Accepted

			Are the sum values for in-can and dry film separate or interrelated? A sum total of 0.1% for isothiazolinones would be twice the current limit.	The total for in-can and dry film preservatives is additive, however, in-line with the current criteria the sum total for isothiazolinones shall be 0.05%.	Clarification
			OIT should be derogated. It is not possible to work only with IPBC and Zinc Pyrithione as dry film preservatives. These preservatives can also cause paint discolouration.	It is understood that OIT may play a dual role of in-can and dry film preservative. It is proposed for derogation only for outdoor paints with the addition of hazard H311(R24) for this preservative only.	Accepted
2. Drying and anti-skinning agents	**2(a) Driers**	Iron driers should be included	Iron based driers are excluded based on their classification. They are environmentally preferable to cobalt driers, which additionally require H400 derogation.	In recognition of their environmentally preferable status the hazard derogations have been adjusted to permit iron driers. This removes H400/H410 and adds H301 (R24) and H373 (H48/20-22). Cobalt driers now have a more specific derogation recognising their drying function.	Accepted
		H373 should be added as a derogation for driers	Given that CLP classification rules have changed this additional classification is required to ensure they can still be used.	H373 has been added for the more environmentally preferable iron driers. Manganese driers are also identified in the Subsport substitution database, but no classifications could be found in the C&L Inventory database.	Accepted
		Cobalt salts should be restricted	Cobalt salts are a Candidate List substance and shall not be used.	This status is addressed by criteria 5b.	Clarification
		The cobalt limit should relate to the total content	The limit of 0,05% must be referred to as the content of Cobalt in alkyd paint.	This clarification has now been made.	Accepted
4. Surfactants	**4(a) General purpose surfactants**	Additional hazard derogations	Derogations are required for H400, H410 and H411 in order to support paint formulation and to reflect possible variations in CLP classifications.	Of the derogations received from manufacturers the surfactants that were classified with H400, H410 and H411 tended to have an ingoing surfactant mixture classification of H412 or H411. It is therefore proposed to extend the derogated hazards only to H411	Modified
		Variations in the sum limit values by colour	The sum total limit value could be lowered to 1.0% for white and light coloured products (the majority of products) as 3.0% would be a worse case for colours.	The derogation has been made more specific, differentiating between white/light paints and colours. The majority of paints will fall into the first category, enabling the hazardous content to potentially be reduced. However, this must be balanced against the addition of H411 to the derogation.	Modified
	4(b) Alkylphenolethoxylates (APEOs)	An indicative APEO list should be appended	A list of APEO's could be added in order to support raw material declarations (see the Blue Angel UZ12a)	It is proposed to include a reference to the indicative list of APEO's in the Blue Angel.	Accepted
	(c) Perfluorinated surfactants	Chain lengths less than C6	Persistency is still of concern for chain lengths shorter than six carbons. That the paint is easier to clean is not sufficient justification for their use. Surfactants used in the paints should pass the same criteria as for the detergents regulation EC 648/2004.	The proposal is in-line with industry substitution initiatives for perfluorinated substances (e.g.led by US EPA). Hazards H411-H413 are proposed as being derogated for general purpose surfactants because of their important role in paint formulations. The paint mixture may not, however, be classified. In recognition of concerns the derogation has been made more specific to where these surfactants are used to provide specific additional functions - namely resistant or repellent to water or with a high spreading rate. The latter supports efficient paint use.	Modified

5. Miscellaneous functional substances with general application	**5(b) Metals**	Cut-off limit	In the current draft it is stated as: «Trace impurities 0,01% cut-off». Is it still for each metal for each ingredient? Please clarify again.	The 0.01% cut-off applies per listed metal. This has now been clarified in the text.	Clarification
	5(c) Mineral raw materials including fillers/(f) Pigments	To which metals does the testing requirment apply?	Does the test for solubility only apply to the metals listed in 5b? Moreover, insoluble requires defining because DIN 53770-1 only determines solubility.	The test shall only apply to the metals listed in 5b. A definition is to be provided in the User Manual.	Clarification
6. Miscellaneous functional substances with specialist applications	**6(b) Plasticisers in paints and varnishes**	Scope of the restrictions	Why are only 8 phthalates listed. In some other ecolabels up to 27 are restricted.	The eight phthalates listed are those identified as being on the Candidate List and/or which warrant restriction on a precautionary basis for applications in rooms with small children. Phthalates for which evidence exists for their hazard classification or for meeting Article 57 criteria will be restricted automatically by criteria 5a e.g. according to the CMR hazards.	Clarification
7. Residual substances that may be present in the final product	**7(a) Formaldehyde**	Formaldehyde donors	How shall it be determined if formaldehyde donors are required?	This shall be the decision of paint formulator, however, given future classification with H350 the criteria has been weighted to make their use more restrictive.	Clarification
			Polymer dispersions (binders) are present in all paint products, all paints would be covered by the derogation.	It is proposed to remove this reference as binders should be checked/selected to ensure that the paint complies.	Modified
		Appropriateness of limit values	The limit values should be workable for all kinds of indoor paints.	Feedback from stakeholders has not in general raised concerns in relation to any specific paint applications.	Clarification
		Selection of test method	Why is EN 717-3 referred to instead of ISO 16000-3?	EN 717-3 was understood to have been used to test paint in some countries, but in most cases the ISO standard is now used. The reference has now been changed to ISO 16000-3.	Accepted
			In the Blue Angel emissions testing is only required as an alternative to content testing. In practice, this alternative has not been used by applicants.	Given the future reclassification of formaldehyde as H350 it is proposed that the emissions test be retained as a derogation condition given the addition of the 100 ppm limit and possible concerns about consumer exposure.	Rejected
			Could calculations be accepted for verification or, as an alternative to HPLC, the cheaper Merckoquant method?	The revised proposal is intended as being strictly based on test methods, particularly in the light of H350 reclassification. It is accepted that HPLC is expensive but VdL-RL 03 was understood to be inaccurate, particularly with certain dispersion formulations. It is proposed that the Merckoquant test, which is understood to have be cheaper and to be accurate around the 10ppm threshold be used as the main form of verification. The result does have the potential to be inaccurate for certain formulations, in which case HPLC shall be used for final determination.	Modified
	7(b) Solvents	Scope of the restrictions	The requirement on organic solvents should be expanded to halogenated organic compounds,	This change has now been made.	Accepted

	(d) Volatile Aromatic Hydrocarbons and halogenated solvents	Scope of the restrictions	The restriction on VAH's should be split into unreacted monomers and VAH. A proposal to restrict these substances to 0.01% as impurities was made.	The distinction has now been made. Declaration of non-use is proposed for VAH's.	Accepted
6. Consumer information	**Clarity and length of information**		The consumer information is too long and complicated. It should be presented in a clearer form, point by point.	The information has been rationalised into three headings - statements on the packaging, general information and advice and advice and recommendations on paint handling. The first heading has specific statements that shall be used. The other headings now have a number of itemised points that shall be addressed in the information provided to the consumer.	Accepted
		Use of technical language	The language is too technical e.g. reference to LCA is not appropriate.	Technical references of this kind have been removed.	Accepted
	Specific requirements	Disposal of empty packaging	There should be a requirement stating that empty packaging should be disposed of carefully/advice provided on how to dispose of it.	General advice is provided on safe handling and disposal, with example messages for the packaging/additional information.	Accepted
		Minimising paint waste	"Estimate the needed amount of paint carefully to avoid left overs" should be used instead of "unused paint is not waste".	The main message now states *"Minimise paint wastage by estimating how much paint you will need".* The suggested advice has been amended to make reference to the *'estimate [of] the amount of paint needed prior to purchase in order to minimise paint wastage '* .	Accepted
			The applicant should not be restricted to the reference "x liters of paint for 1m2" and should have the option to provide this information on label in other ways.	The point has been made more general with the reference to "x liters of paint for 1m2" given as an example.	Accepted
			What if not links/information exist on how to safely dispose of paint?	It is considered important the potential to highlight disposal initiatives IF they exist, hence a reference to them has been retained, however the clause '*where available'* has been added.	Modified
7. Information appearing on the EU Ecolabel	**Reference to VOC content**	Familiarity to consumers	"Low solvents" is more familiar to the consumers than "low content of VOC"	The term VOC appears on a voluntary labelling scheme used in many countries and is also communicated in this form under the requirements of the Decorative Paints Directive. It is therefore considered to be an appropriate reference.	Rejected