

# Revision of the EU Ecolabel criteria for indoor and outdoor Paints and Varnishes

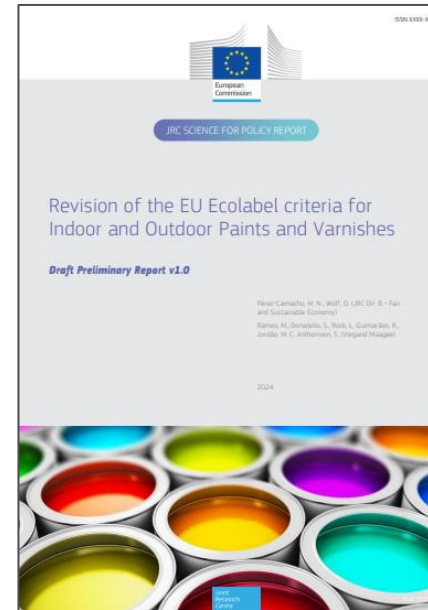
EUEB Meeting 18 April 2024

JRC B.5

Hybrid meeting

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Documents available in BATIS and Product Bureau Website here draft [PR](#) and draft [TR1](#)

# EU Ecolabel for Paints and Varnishes

**Commission Decision (EU) 2014/312** of 28 May 2014 establishing the ecological criteria for the award of the EU Ecolabel for **indoor and outdoor paints and varnishes**

02014D0312 — EN — 18.07.2022 — 006.001 — 1

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►B  
COMMISSION DECISION  
of 28 May 2014  
establishing the ecological criteria for the award of the EU Ecolabel for indoor and outdoor paints and varnishes  
(notified under document C(2014) 3429)  
(Text with EEA relevance)  
(2014/312/EU)  
(OJ L 164, 3.6.2014, p. 45)

Amended by:

		Official Journal		
		No	page	date
►M1	Commission Decision (EU) 2015/886 of 8 June 2015	L 144	12	10.6.2015
►M2	Commission Decision (EU) 2016/397 of 16 March 2016	L 73	100	18.3.2016
►M3	Commission Decision (EU) 2018/666 of 27 April 2018	L 111	2	2.5.2018
►M4	Commission Decision (EU) 2020/503 of 3 April 2020	L 109	14	7.4.2020
►M5	Commission Decision (EU) 2021/1871 of 22 October 2021	L 379	49	26.10.2021
►M6	Commission Decision (EU) 2022/1229 of 11 July 2022	L 189	20	18.7.2022

6 amendments

No.	Criterion
1	White pigment and wet scrub resistance
2	Titanium dioxide
3	Efficiency in use (11 performance requirements) (a) Spreading rate; (b) Resistance to water; (c) Adhesion; (d) Abrasion; (e) Weathering; (f) Water vapour permeability; (g) Liquid water permeability; (h) Fungal and algal resistance; (i) Crack bridging; (j) Alkali resistance; (k) Corrosion resistance
4	Volatile and Semi-volatile Organic Compounds (VOCs, SVOCs)
5	Restriction of hazardous substances and mixtures (a) Overall restrictions that apply to hazard classifications and risk phrases (b) Restrictions that apply to Substances of Very High Concern (c) Restrictions that apply to specific hazardous substances
6	Consumer information
7	Information appearing on the EU Ecolabel

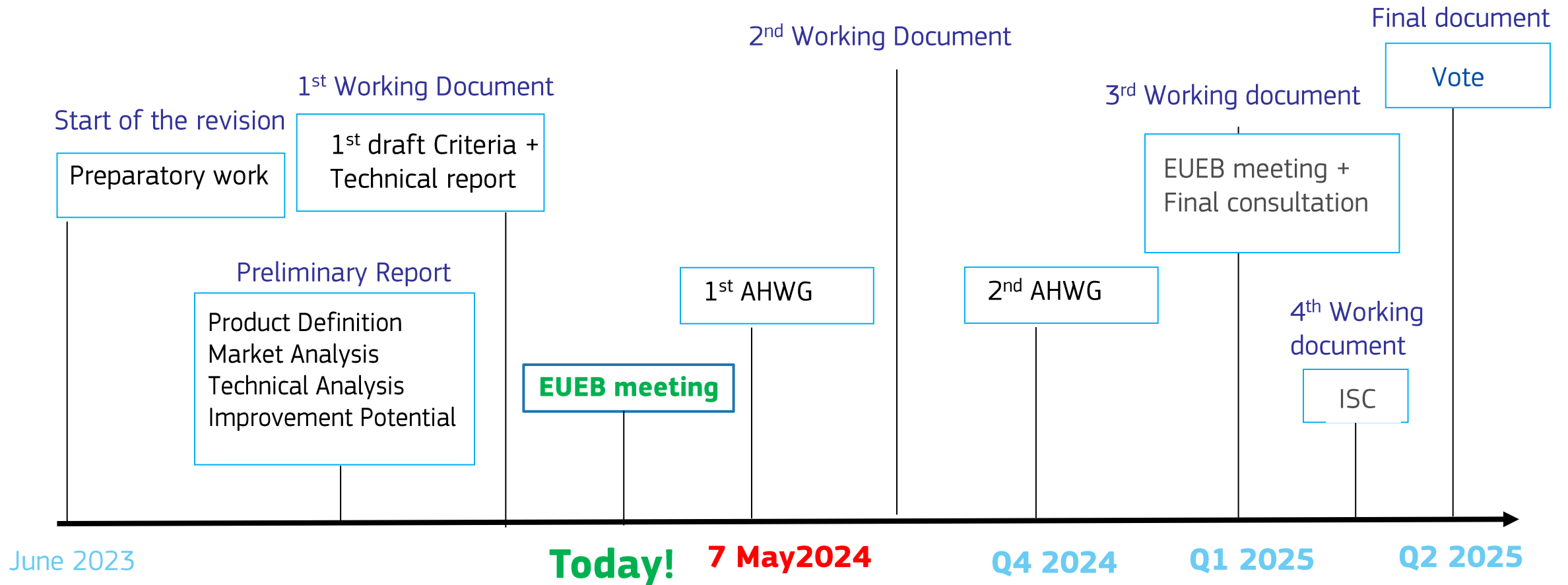
<https://eur-lex.europa.eu/eli/dec/2014/312/2022-07-18>

Current criteria valid until  
December 2025









# Time planning (tentative)

Current criteria valid until  
December 2025



# Update to EUEB

## Input from last revision process

Input from last revision	Investigation conducted	Proposal April 2024
reassess the feasibility of setting criteria for managing unused paint and re-using/recycling paint;	Identified as a market-based best practice → EPR (take-back schemes). The use of surplus paint residues cannot be identified. Unknown formulations which impedes recycling. ~ PR p. 138	
investigate setting criteria for binders;	It would be useful to define P&V in terms of their chemistry, i.e. type of binder or resin used. The input from experts would be needed. ~ TR1 p. 13	
investigate setting criteria for nanomaterials;	The active addition of microplastics to P&V is not a widespread practice. ~ PR p. 135	
investigate setting criteria for paint packaging and recycled content;	New legislation: Packaging and Packaging Waste Regulation soon to-be-adopted ~ PR p. 17	
reassess the use of MIT as a preservative and evaluate new scientific evidence and EU legislation	The most efficacious preservatives (like MIT and CMIT/MIT) can no longer be used in significant concentrations after the CLP reclassifications. ~ TR1 62	
reassess the feasibility of setting criteria for indoor air quality requirements based on emission tests;	Exposure to VOCs linked with a variety of health and allergy impacts; labels that aim to help consumers to select low VOC emission products; included in other ecolabels. ~ TR1 p. 64	 New criterion proposal

# Update to EUEB

## Scope

PR p. 34  
TR1 from p. 15

PRODUCT CATEGORY	Inclusion in other Ecolabels and environmental schemes	Interest of stakeholders	Market relevance (EU 27)	Environmental impacts	Formulation similarity with products currently in the scope	Potential for inclusion	Notes
water-based aerosol paints	0	1	1	2	0	Medium	Separate annex
road marking paints	0	0	0	1	1	Low	Separate annex. Input from industry
powder/cement products	2	0	Unknown	2	0	Medium	Separate annex for masonry paints or adjustment of criteria
wood oils	2	2*	Unknown	?	0	Medium	Criteria on oil product and sustainable agriculture
waterproofing products	0	1	Unknown	2	1	Medium	Further research needed

# Update to EUEB

## Restructuring of the criteria

Summary of criteria applicable to each product type:

indoor paints,  
outdoor paints,  
indoor varnishes,  
outdoor varnishes.

	Criterion applies
	Criterion applies sometimes
	Criterion does not apply

**Recommendation: two annexes, one for paints and one for varnishes.**

**To be further discussed at 1<sup>st</sup> AHWG.**

Criterion	Indoor paint	Outdoor paint	Indoor varnish	Outdoor varnish	Reasons why applies as it does
1. White pigment content	Yes	Yes	No	No	All paints have white pigments, varnishes do not.
2. Titanium dioxide production	Yes	Yes	No	No	The vast majority of paints contain TiO <sub>2</sub> , varnishes do not.
3a. Efficiency in use: spreading rate	Yes	Yes	No	No	
3b. Efficiency in use: resistance to water	Some?*	Some*	Yes	Yes	*only for floor paints
3c. Efficiency in use: adhesion	Some*	Some*	Some?*	Some?*	*only to floor paints, primers and undercoats
3d. Efficiency in use: abrasion	Some?*	Some*	No	No	*only for floor paints
3e. Efficiency in use: weathering	No	Yes	No	Yes	
3f. Efficiency in use: water vapour permeability	No	Yes	No	No	
3g. Efficiency in use: liquid water permeability	No	Yes	No	No	
3h. Efficiency in use: fungal resistance	No	Yes	No	No	Not sure if also for indoor paints in high humidity environments...
3h. Efficiency in use: algal resistance	No	Yes	No	No	Not sure if also for indoor paints in high humidity environments...
3i. Efficiency in use: crack bridging	No	Some*	No	No	*only for elastomeric paints
3j. Efficiency in use: alkali resistance	No	Some*	No	No	*only for masonry paints
3k. Efficiency in use: corrosion resistance	No	Some*	No	No	*only for anti-corrosion paints in outdoor environments and on trim and cladding
4. VOC and SVOC content	Yes	Yes	Yes	Yes	
5. Restriction of hazardous substances and mixtures	Yes	Yes	Yes	Yes	
6. Consumer information	Yes	Yes	Yes	Yes	
7. Information appearing on the EU Ecolabel	Yes	Yes	Yes	Yes	
X. VOC emissions (new)	Yes	No	Yes	No	
X. Carbon footprint	Yes	Yes	Yes	Yes	

# Update to EUEB

## New criteria proposals 1/2

### New criterion on VOC emissions?

- Identified in the last revision
- Health and allergy impacts
- It considers: low VOC and SVOC content, & low levels of VOCs when applied

To be further discussed at 1<sup>st</sup> AHWG

#### Proposed updated criterion on VOC emissions

*Note: only applicable to indoor paints and varnishes*

Emissions of VOCs and SVOCs shall not exceed the limits defined in the table below.

Parameter	3-day test results	28-day test results
TVOC*	< 3000 µg/m <sup>3</sup>	< 300 µg/m <sup>3</sup>
TSVOC*		< 100 µg/m <sup>3</sup>
R value**		≤ 1.0
Formaldehyde		< 20 µg/m <sup>3</sup>
Sum of any other Carcinogenic 1A or 1B VOCs apart from formaldehyde	< 10 µg/m <sup>3</sup>	< 1 µg/m <sup>3</sup>

\* TVOC and TSVOC are as defined in EN 16402 and including quantification of any non-target compounds

\*\* R value, as defined in EN 16402

#### Assessment and verification:

The applicant shall submit a copy of an EN 16402 test report for each of the products being covered by the EU Ecolabel license application. In cases of products with identical formulations but different packaging volumes or types, one test report shall suffice. In cases of products based on the same formulation but with multiple different shades, a test report for the worst-case formulation shall be suffice, so long as it is clearly explained why that particular product formulation represents the worst-case.

For the calculation of the R value, reference should be made to the latest set of agreed EU LCI values available at the time of testing. These values can be consulted here on the European Commission website: [https://single-market-economy.ec.europa.eu/sectors/construction/eu-lci-subgroup/eu-lci-values\\_en](https://single-market-economy.ec.europa.eu/sectors/construction/eu-lci-subgroup/eu-lci-values_en)

# Update to EUEB

## New criteria proposals 2/2

### New criterion on carbon footprinting or PEF?

- PEFCR for paints and the multiple relevant EF datasets
- Commission Recommendation (EU) 2021/2279, could serve as a basis for carrying out a PEF analysis
- Construction Products Regulation
- Energy Performance of Buildings Directive

**To be further discussed at 1<sup>st</sup> AHWG**

#### Proposed updated criterion on carbon footprinting of paint and varnish products

The life cycle carbon footprint of the paint or varnish products shall be assessed according to one of the following methods, with preference being given in the order of the list below.

- A cradle-to-grave analysis using the latest Environmental Footprint datasets and according to relevant Product Environmental Footprint Category Rules (PEFCR) that are valid at the date of the application for the EU Ecolabel license.
- A cradle-to-grave analysis using the latest Environmental Footprint datasets and according to general Product Environmental Footprint methodology set out in Commission Recommendation (EU) 2021/2279.
- A cradle-to-grave analysis reporting on modules A to C of the EN 15804 method and using any combination of specific and generic data for ingredients and reference flows.
- A cradle-to-gate analysis using module A of the EN 15804 method and using any combination of specific and generic data for ingredients and reference flows.

Except in the case where the PEFCR is followed the carbon footprint shall be reported using a functional unit of per m<sup>2</sup> per year.

Any datasets and calculation rules used shall be those in force at the date of the application for the EU Ecolabel.

#### Assessment and verification:

The applicant shall provide the Competent Body with a full formulation of the paint or varnish product(s) and the associated carbon footprints of each ingredient. Reference flows for fuel, electricity, water, wastewater, normal waste and hazardous waste shall also be provided. Transport assumptions (distance and mode) shall be explained for each ingredient coming to the factory as well as an average distribution scenario for sold products. Assumed losses due to spoilage, spillage and misapplication shall be communicated as will an assumed spreading rate in m<sup>2</sup>/L, which should be the same as communicated on any packaging, if mentioned there.

The assumed lifetime before reapplication shall be estimated and explained in terms of the results of durability testing of the paint or varnish product(s).

# Update to EUEB

- Input from last revision process
- Scope discussion
- Restructuring of criteria
- New criteria proposals: New criterion on VOC emissions? New criterion on carbon footprinting or PEF?

## Any comments?

Deadline for comments to TR1 is 22 May 2024 (please use BATIS)

Documents available in BATIS and Product Bureau Website here draft [PR](#) and draft [TR1](#)

# Thank you!

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