



**Ministry of Environment
and Food of Denmark**
Environmental
Protection Agency

Hugo-Maria Schally
Head of Unit
Eco-innovation and Circular economy
Directorate-General for Environment
European Commission

Danish EPA Environmental
Technology
J.nr. 001-14038
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Dear Mr Hugo-Maria Schally,

The latest amendment of the ecological criteria for EU ecolabelled paint and varnishes (sent by the Commission on October 29th 2015) has raised concern in the Danish Parliament due to the acceptance of using substances labelled environmentally hazardous in EU ecolabelled products, especially in the case where this results in a hazard labelling.

More specifically, the concern relates to the decision to allow continued use of Adipic acid dihydrazide (ADH) and the biocide active substance IPBC in eco-labelled paint and varnishes in spite of their new classification as environmentally hazardous substances.

Denmark generally supports the principle of avoiding changes to the criteria in between planned revisions to ensure certainty for the license holders. Thus, Denmark voted positive to the proposal that would maintain status quo and allow continued use of these two substances.

The national consultation, however, revealed that there might be a less hazardous alternative to the use of the adhesion promoter and cross linker ADH. The consultation process referred to paint manufacturers using such an alternative.

It is clear from the EU ecolabel regulation that the substitution of hazardous substances by safer substances, wherever it is technically feasible, is a very important requirement.

Therefore, Denmark shall kindly ask the Commission as part of the next revision process of the criteria to thoroughly investigate less hazardous alternatives to ADH binder and less hazardous biocides, which have similar or higher effectiveness and environmental performance throughout the product's entire lifecycle compared to those used today. Such an investigation should also include an evaluation of other paint techniques, e.g. linseed oil paint systems, and the market shares and availability of the alternatives.

For further details please contact Søren Mørch Andersen (san@mst.dk).

Yours sincerely,

Søren Bukh Svenningsen
Head of Division