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ENV.A.1 - Eco-Innovation & Circular Economy
Head of Unit

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Mr Søren Bukh Svenningsen
Head of Division
Environmental Technology,
Danish Environmental
Protection Agency,
Ministry of Environment and
Food of Denmark
29 Strandgade,
1401 Copenhagen, Denmark

Subject: Commission Decision (EU) 2016/397 amending Decision 2014/312/EU establishing EU Ecolabel criteria for indoor and outdoor paints and varnishes regarding the use of Adipic acid dihydrazide (ADH) and 3-iodo-2-propynyl butylcarbamate (IPBC) in EU Ecolabel products

Dear Mr Søren Bukh Svenningsen,

Thank you very much for your recent letter with regards the EU Ecolabel criteria for indoor and outdoor paints and varnishes and the recent amendment made through Commission Decision 2016/397 of 16 March 2016.

The Commission considers it to be important to avoid changes to the criteria in between planned revisions so as to ensure legal certainty for the license holders. Moreover, I would like to highlight that the decision to continue allowing the use of Adipic acid dihydrazide (ADH) and 3-iodo-2-propynyl butylcarbamate (IPBC) was made on the basis of the evidence gathered by JRC/IPTS via a consultation of stakeholders. The two substances you refer to in your letter, can also only be included in EU Ecolabel products for a limited number of uses and under strict conditions. This use is only for providing specific functions and for limited types of paints, where safer and more environmental friendly substitutes are not available.

On the occasion of the next revision of the EU Ecolabel criteria of this product group, we will review how the market has developed and thoroughly investigate if safer and more environmental friendly alternatives to these two substances are available. This investigation shall certainly include the consideration of avoiding the use of hazardous

substances with the use of different technologies. As done so far, any process targeting the revision of EU Ecolabel criteria will benefit greatly from the participation of experts , who can share available market intelligence and knowledge of safer alternatives.

I very much look forward to continue working with you further for the benefit of the EU Ecolabel scheme.

Yours sincerely,



Hugo Maria SCHALLY