

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 (VOC) due to the
use of organic solvents in certain paints and varnishes and vehicle refinishing
products and amending Directive 1999/13/EC

CEPE GUIDANCE

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Document History

Edition	Essential Changes	Date
1	First version	-
2	-	March 3rd, 2006
3	<p>All the references to the 2007 limit were removed as no longer relevant for any products produced after 2010.</p> <p>As of 2010 companies either complied to the 2010 limit or the VOC reference was to be removed, as no longer compliant in this regard. Above can also be seen in the label example from ECHA – with just one “limit”.</p> <p>Inclusion of the ECHA Guidance label example stating the obligatory information according to VOC Directive¹</p>	June 4 th , 2026

¹ The ECHA Guidance on labelling and packaging in accordance with Regulation (EC) No 1272/2008. Version 4.2. March 2021. Page 66.

Under the volatile organic compounds Directive², article 4, specific mandatory information on the label is requested:

Article 4

Labelling

Member States shall ensure that the products set out in Annex I carry a label when they are placed on the market. The label shall indicate:

- (a) the subcategory of the product and the relevant VOC limit values in g/l as referred to in Annex II;
- (b) the maximum content of VOC in g/l of the product in a ready to use condition.

To comply with these requirements CEPE proposes that products covered by this Directive should be labelled in one of the following ways:

Option 1: **EU limit value for this product (cat. A/c): x /g/l**
 This product contains max. y g/l VOC

Option 2: **EU limit value for [product name] (cat. A/c): x g/l**
 [Product name] contains max. y g/l VOC

This proposed labelling provides the information required by article 4 of the directive and gives answer to the intention of the Council and of the Parliament to provide information on the VOC limit and current (maximum) VOC content in order to inform the consumer.

CEPE recommends putting the labelling information inside the existing “legal box” as supplementary health or safety information referred in Article 11.1 of Directive 1999/45/EC, to ensure international harmonisation. If this legal box does not exist the information should be placed elsewhere on the label in a readable form.

For those products sold in small packaging (<125 ml) it is impossible to include the text as proposed above due to the lack of space on the label. In this case companies may decide to use a code e.g.:

2004/42/IIA(d)/300/X

² [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](#)

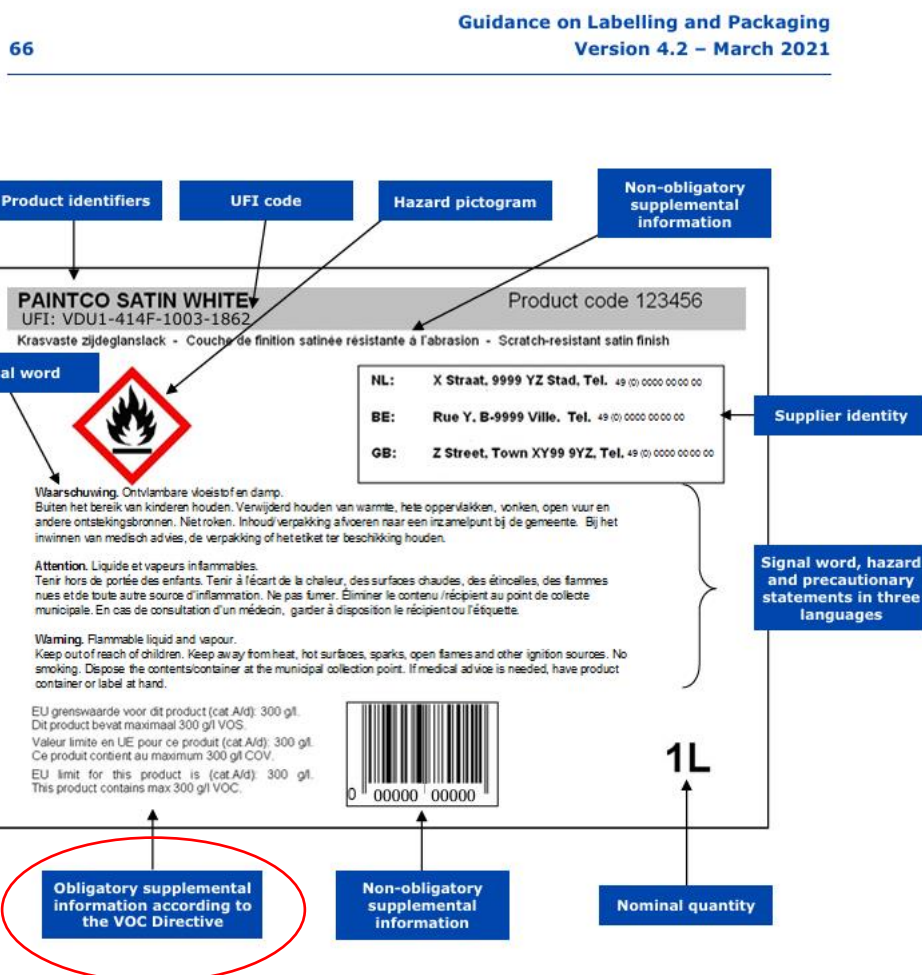
indicating a product in subcategory IIA (d), with an allowed limit of 300 g/l and a maximum VOC content ready to use of X g/l of the labelled product.

To support the clarity of the code from a consumer perspective, we recommend referring to the technical data sheet for an explanation of the code.

Explanation of the code references:

- 2004/42 refers to the Directive (2004/42/EU).
- IIA(d) Refers to Annex II, Table A and (d) is the interior/exterior trim paint, where it says "Interior/exterior trim and cladding paints for wood and metal"
- 300 is the max VOC content after 1/1/2010.
- X is the actual VOC content.

According to ECHA Guidance³, the information related to VOC Directive can be stated as follows:



³ The ECHA Guidance on labelling and packaging in accordance with Regulation (EC) No 1272/2008. Version 4.2. March 2021. Page 66.