



Directive 2004/42/EC of the European Parliament and of the Council on the limitation of emissions of volatile organic compounds due to the use of organic solvents in decorative paints and varnishes and vehicle refinishing products and amending Directive 1999/13/EC

**CEPE guideline on labelling (Article 4)
Vehicle refinishing products**

Update October 2011

Taking into account experiences from the vehicle refinishing industry CEPE confirms and explains the proposal for meeting the requirements on labelling according to the Directive 2004/42/EC.

Requirements of VOC directive 2004/42/EC

Article 4 of the directive is asking for labelling vehicle refinishing products set out in Annex I clause 2 by indicating:

- The subcategory of the product
- The relevant VOC limit value in g/l as referred to in Annex II
- The maximum content of VOC in g/l of the product in a ready to use condition

The subcategories are determined in Annex I and II and identified explicitly by enumerators, and the VOC values and limits are all described in g/l.

The purpose of this article is to provide guidance for customers as well as for environmental inspectors to easily detect the VOC value and compliance of the product with this value.

Article 4 restricts itself to give a general description of the contents and does not require one specific text to be reproduced on the label. This expresses the purpose of giving a certain freedom how to phrase the required information of the label.

To meet these requirements CEPE recommends for vehicle refinishing products covered by this directive to put on the label the pictogram of the Technical Data Sheet (TDS) close to the product specific phrase with the reference to product category and VOC values, e.g.:

2004/42/IIB(d)(420)410

indicating a product in subcategory Annex II section B (d), with an allowed limit of 420 g/l VOC, and a maximum VOC content ready to use of 410 g/l of the labelled product.



In addition to this CEPE recommends adding the following text in the TDS headed by the phrase which is shown on the label:

2004/42/IIIB(d)(420)410

"The EU limit value for this product (product category d as in Annex II section B) in ready to use form is max 420 g/litre of VOC. The VOC content of this product in ready to use form is max 410/g/l."

This proposal is followed for VOC compliant vehicle refinishing products by nearly all manufacturers in the European Union.

Justification

Basically all required information is available and can directly be used by the target-audience.

Beyond that customers of vehicle refinishing products are well aware of VOC regulations being implemented with the VOC directives 1999/13/EC and 2004/42/EC, and are familiar with comprehensive technical documentation including pictograms and technical terms.

Refinish products as set out in Annex I clause 2 are developed for and sold to professional users only. These customers make their decision to buy a product by means of Technical Data Sheets and testing the material beforehand.

All inspections carried out by authorities throughout the EU that CEPE has become aware of showed that refinishing products falling under the directive 2004/42/EC are identified and verified for compliance appropriately.

Moreover, the final report about the implementation and review of the directive (Oekopol, Nov. 2009) confirmed the successful implementation of the directive and did not report any issues for environmental inspectors to identify the VOC labels based on the current labelling recommendation made by CEPE.

Finally, the readability and intelligibility are supported as the term contains letters and numbers that cover all European languages or can be understood in the given context (according to official translations of the Directive 2004/42/EC made available by the EU Commission)

Further text on labels would reduce readability and clarity of the needed data.



In summary:

The CEPE proposal for labelling vehicle refinishing products does meet the requirements of the directive 2004/42/EC and allows the necessary information on VOC to be made available to the target-audience.

The label term in addition with the information on the Technical Data Sheets have been applied since the directive came into place, and they are broadly accepted by the professional end-users as well as the environmental inspectors.

Underlined by the report about the implementation of the directive (performed by Oekopol, a consultant of the EU Commission) the conclusion is appropriate that the approach proposed by CEPE and implemented by the paint industry has contributed to the success of reducing VOC emissions without significant complaints.

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