



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) Decorative paints and varnishes

Article 4 of the directive indicates that products set out in Annex I must carry a label indicating:

- (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 all 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 z g/l VOC

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

The first part of the labelling refers to article 4 part (a). The value x is the limit value for 2010 as indicated in the annex IIA of the directive.

The second part of the labelling refers to article 4 part (b).

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 information referred to in Article 11.1 of Directive 1999/45/EC or Article 25.3 of Regulation 1272/2008 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)300/260

indicating a product in subcategory IIA (d), with an allowed limit of 300 g/l from 1.1.2010 and a maximum VOC content ready to use of 260 g/l of the labelled product.

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