Nordic Ecolabel and EU Ecolabel

Declaration from the manufacturer of the raw material

To be used in conjunction with an application for a licence for the Nordic Ecolabelling of paints and varnishes version 4, Nordic Ecolabelling of chemical building products version 3 and EU Ecolabelling for decorative paints, varnishes, and related products, performance coatings and related products, and water-based aerosol spray paints and repealing Decision 2025/2607.

Declaration is made by the chemical supplier based to the best of their knowledge at the given time, also based on information from raw material manufacturers, recipe, and available knowledge on the chemical product with reservations for new advances and new knowledge. Should such new knowledge arise, the undersigned is obliged to submit an updated declaration to Nordic Ecolabelling.

Raw material name: _____

Raw material's function: _____

The requirements in the criteria document and accompanying appendices apply to all ingoing substances in the Nordic Swan Ecolabelled or EU Ecolabel product. Impurities are not regarded as ingoing substances and are exempt from the requirements. Ingoing substances and impurities are defined below, unless stated otherwise in the requirements.

Ingoing substances: all substances in the product regardless of amount, including additives (e.g., preservatives and stabilizers) in the raw materials. Substances known to be released from ingoing substances (e.g., formaldehyde, arylamine, in situ-generated preservatives) are also regarded as ingoing substances.

Impurities: residuals, pollutants, contaminants etc. from production, incl. production of raw materials, that remain in the product in concentrations less than 100 ppm (0,0100 w%).

Nordic Swan: Impurities in raw materials exceeding concentrations of 10 000 ppm (1.0000 w%) are always regarded as ingoing substances, regardless of the concentration in the product.

EU Ecolabel: Impurities in raw materials exceeding concentrations of 1 000 ppm (0.1000 w%) are always regarded as ingoing substances, regardless of the concentration in the product.

Examples of impurities are residues of the following: residues or reagents incl. residues of monomers, catalysts, by-products, scavengers, and detergents for production equipment and carry-over from other or previous production lines.

The impurity limit of 100 ppm (0.0100 w%) applies to each individual substance that is excluded, i.e., Impurities with the same classification in different raw materials shall not be summed up to comply with the limit. The same contaminants in different raw materials also do not need to be summed.

Nordic Swan criterion O3 (096, 097), EU Ecolabel sub-criterion 4.2 (044, 056, 057):		
Does the raw material contain substances classified with any of the hazard phrases below? *Including all combinations of stated exposure routes and stated specific effect. For example, H350 also covers classification H350i.*	Yes	No
If the answer to all the classifications below is No, mark here		☐
H350 – May cause cancer	☐	☐
H351 – Suspected of causing cancer	☐	☐
H340 – May cause genetic defects	☐	☐
H341 – Suspected of causing genetic defects	☐	☐
H360 – May damage fertility or the unborn child	☐	☐
H361 – Suspected of damaging fertility or the unborn child	☐	☐
H362 – May cause harm to breast fed children	☐	☐
H300 – Fatal if swallowed	☐	☐
H310 – Fatal in contact with skin	☐	☐
H330 – Fatal if inhaled	☐	☐
H301 – Toxic if swallowed	☐	☐
H311 – Toxic in contact with skin	☐	☐
H331 – Toxic if inhaled	☐	☐
EUH070 – Toxic by eye contact	☐	☐
H304 – May be fatal if swallowed and enters airways	☐	☐
H370 – Causes damage to organs, STOT SE 1	☐	☐
H371 – May cause damage to organs, STOT SE 2	☐	☐
H372 – Causes damage to organs through prolonged or repeated exposure, STOT RE 1	☐	☐
H373 – May cause damage to organs through prolonged or repeated exposure, STOT RE 2	☐	☐
H317 – May cause an allergic skin reaction	☐	☐
H334 – May cause allergy or asthma symptoms or breathing difficulties if inhaled	☐	☐
H420 – Hazardous to the ozone layer	☐	☐
EUH380 – May cause endocrine disruption in humans	☐	☐
EUH381 – Suspected of causing endocrine disruption in humans	☐	☐
EUH430 – May cause endocrine disruption in the environment	☐	☐
EUH431 – Suspected of causing endocrine disruption in the environment	☐	☐
EUH440 – Accumulates in the environment and living organisms including in humans	☐	☐
EUH441 – Strongly accumulates in the environment and living organisms including in humans	☐	☐
EUH450 – Can cause long-lasting and diffuse contamination of water resources	☐	☐
EUH451 – Can cause very long-lasting and diffuse contamination of water resources	☐	☐

If the answer to any of the above questions is Yes, state the CAS No. (where possible), chemical name and level (in ppm, w% or mg / kg). Also, state whether the substance is contained in the form of an impurity or an added substance. If it is residual monomers in polymers, please state in criterion O7 (096, 097), EU Ecolabel sub-criterion 4.3: instead.

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Nordic Swan criterion O4 (096, 097), EU Ecolabel sub-criterion 4.2 (044, 056, 057):		
Does the raw material contain any substances classified as harmful to the environment with the following risk phrases or combinations of them?	Yes	No
H400 – Very toxic to aquatic life, Acute 1	☐	☐
H410 – Very toxic to aquatic life with long-lasting effects	☐	☐
H411 – Toxic to aquatic life with long-lasting effects	☐	☐
H412 – Harmful to aquatic life with long-lasting effects	☐	☐
H413 – May cause long-lasting effects to aquatic life	☐	☐

If the answer to any of the above questions is Yes, state the CAS No. (where possible), chemical name and level (in ppm, w% or mg / kg). Also, state whether the substance is a preservative.

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Nordic Swan criterion O5 (096, 097), EU Ecolabel sub-criterion 4.3 (044, 056, 057):		
Please state:	Yes	No
Does the product contain any preservatives?	☐	☐
If yes, please state: Is each preservative product authorised under Regulation (EU) No 528/2012 for Product Type 6 (PT6) and/or Product Type 7 (PT7), or made available on the market in accordance with Article 89(2) of that Regulation?	☐	☐
Does the raw material contain isothiazolinones?	☐	☐

If the answer to any of the above questions is Yes, state the CAS No. (where possible), chemical name and level (in ppm, w% or mg / kg) for each preservative.

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Nordic Swan criterion O6 (096, 097), EU Ecolabel sub-criterion 4.3 (044, 056, 057):		
Please state:	Yes	No
Does the raw material contain free formaldehyde?	☐	☐
Does the raw material contain formaldehyde-releasing substances (e.g. bronopol or other donors)?	☐	☐

If yes, please specify CAS No. and chemical name:

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Concentration of free formaldehyde in the raw material (ppm, mg/kg or w%):

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Concentration of formaldehyde-releasing substance in the raw material (ppm, mg/kg or w%):

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Theoretical formaldehyde release in the raw material (ppm, mg/kg or w%):

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Source of formaldehyde (e.g. residual/impurity, released from donor, residual in polymer dispersion):

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Nordic Swan criterion O7 (096, 097), EU Ecolabel sub-criterion 4.3 (044, 056, 057):		
Does the raw material contain residual monomers in polymers? If the answer is Yes, state the CAS No. (where possible), chemical name and level (in ppm, w% or mg / kg) of residual monomers in newly produced polymers and based on the content in the raw material. (If vinyl acetate is present in an amount over 100 ppm, please also state the amount in ppm in each polymer).	Yes ☐	No ☐

Name of residual monomer	Amount (ppm)	Classification of residual monomer

Nordic Swan criterion O8 (096, 097), EU Ecolabel sub-criterion 4.3 (044, 056, 057):		
Please state: Does the raw material contain any heavy metals (cadmium, lead, chromium VI, mercury, arsenic, barium, selenium, antimony, cobalt)? *Traces of the above-mentioned metals from residuals can be included up to 100 ppm (100 mg/kg, 0.0100 w%) per single metal in the raw material.* *- Barium sulphate and other insoluble barium compounds are exempted.* *- An exception is made for antimony in pigments contained in a TiO2 rutile lattice on the following terms: test results must prove that the molecular structure is inert and that the environmental and health effects of the pigment are on the same level as, or better than, the results for C.I Pigment Brown 24 CAS No. 68186-90-3 and C.I Pigment Yellow 53 CAS No. 8007-18-9 in the report: UNEF Publications, OECD SIDS Initial Assessment Profile (www.inchem.org)*.* *- Cobalt is exempted due to the use of Cobalt aluminate blue spinel (CAS No. 1345-16-0) and Cobalt chromite blue-green spinel pigments (CAS No. 68187-11-1).*	Yes ☐	No ☐

If the answer to any of the above questions is Yes, state the chemical name and level (in ppm, w% or mg / kg) for the soluble or bioavailable amount e.g., via HCl extract, analysis or DIN 53770-1 or similar methods.

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Nordic Swan criterion O9 (096, 097): *Applies to Nordic Swan 096 and 097 only*		
Does the raw material contain more than 3.0 w% titanium dioxide?	Yes ☐	No ☐
As the supplier of TiO2 for paints and varnishes that comply with the Nordic Swan, I hereby declare that: I the undersigned, will attach document that shows that the following values, concerning the production of Titanium dioxide on the following site(s) are fulfilled: If more than one type of ore is used, the values apply proportionately to the ore type used.	Yes ☐	No ☐
As the supplier of TiO2 for paints and varnishes that comply with the Nordic Swan, I hereby declare that: I the undersigned, will attach document that shows that the manufacturing plant has full or pending implementation of an energy management system in accordance with ISO 50 001.	Yes ☐	No ☐

Sulphate process	Limit
SOx expressed as SO2:	7.0 kg/tonne TiO2
Sulphate waste:	500 kg/tonne TiO2
Chloride process	Limit
When using natural ore:	103 kg chloride waste/tonne TiO2
When using synthetic ore:	179 kg chloride waste/tonne TiO2
When using slag ore:	329 kg chloride was/tonne TiO2

If yes, please state amount in w%. If the product contains more than 3.0 w% titanium dioxide, the raw material manufacturer must supply documentation in accordance with requirement O9 in the criteria document of 096 and/or 097.

EU Ecolabel criterion 1 (044, 056, 057): *Applies to EU Ecolabel products only*		
Does the raw material contain more than 3.0 w% titanium dioxide?	Yes ☐	No ☐
As the supplier of TiO2 for paints and varnishes that comply with the EU Ecolabel, I hereby declare that: I the undersigned, will attach document that shows that the following values, concerning the production of Titanium dioxide on the following site(s) are fulfilled:	Yes ☐	No ☐

Parameter and analytical method	Sulphate process	Chloride process
Emissions of dust to air ([1]) (measured with the relevant European or international standards)	≤ 0,40 kg/t TiO_2 pigment	≤ 0,66 kg/t TiO_2 pigment
Emissions of SO_2 to air ([1]) (measured with the relevant European or international standards)	≤ 4,5 kg/t TiO_2 pigment	n/a
Emissions of HCl to air ([1]) (measured with the relevant European or international standards)	n/a	≤ 0,70 kg/t TiO_2 pigment
Emissions of SO_4^{2-} to water (measured with the relevant European or international standards)	≤ 300 kg SO_4^{2-}/t TiO_2 pigment	n/a
Emissions of Cl- to water (measured using the mass balance method or with the relevant European or international standards)	n/a	≤ 103 kg Cl-/t TiO2 pigment ([2]) ≤ 179 kg Cl-/t TiO2 pigment ([3]) ≤ 329 kg Cl-/t TiO2 pigment ([4])

[1] Point sources for emissions of dust to air from the chloride process are considered as: milling, chlorination, oxidation and micronisation stages. Point sources for emissions of HCl to air from the chloride process are considered as: chlorination, acid scrubber from solid separation and metal chloride treatment processes. Point sources for emissions of dust to air from the sulphate process are considered as: milling, digestion, calcination and micronisation stages. Point sources for emissions of SO2 to air from the sulphate process are considered as: digestion and calcination processes.

[2] When ore used is > 95 % TiO2 content.

[3] When ore used is 90-95 % TiO2 content.

[4] When ore used is < 90 % TiO2 content.

Emissions to air shall be counted from the relevant point source(s) stated in point (1) above where emissions can be continuously or periodically monitored from a fixed sampling point after any exhaust gas abatement system(s). Emissions to water shall be considered as sulphate or chloride present in any treated wastewater effluent that is discharged into any rivers, lakes, transitional waters, coastal waters or seawaters. The relevant limit for chloride emissions to water shall be based on the weighted average % TiO_2 content of ore(s) used during the calculation period.		
As the supplier of TiO2 for paints and varnishes and that comply with the EU Ecolabel, I hereby declare that: I the undersigned, will attach document to support how the raw material is added in closed systems, or in means of methods to promote a "low-dust" working environment. A low dust working environment shall, as a minimum, include the follows aspects: — A risk assessment for the workplace that identifies all the main areas of potential dust emission and worker exposure to dust. — The need to have in place an occupational hygiene workplace monitoring program. — Provision of appropriate training to employees about good practice for dust control. — Provision of adequate personal protective equipment to employees and visitors.	Yes ☐	No ☐

If yes, please state amount in w%. If the product contains more than 3.0 w% titanium dioxide, the raw material manufacturer must supply documentation in accordance with criterion 1 in COMISSION DECISION 2025/2607.

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Nordic Swan criterion O11 (096, 097), EU Ecolabel sub-criterion 4.3 (044, 056, 057):		
Does the raw material contain nanomaterials/-particles? *Nanomaterials/-particles are defined according to the EU Commission Recommendation on the Definition of Nanomaterial (2022/C 229/01):* *'Nanomaterial' means a natural, incidental, or manufactured material consisting of solid particles that are present, either on their own or as identifiable constituent particles in aggregates or agglomerates, and where 50 % or more of these particles in the number-based size distribution fulfil at least one of the following conditions:* *(a) one or more external dimensions of the particle are in the size range 1 nm to 100 nm;* *(b) the particle has an elongated shape, such as a rod, fibre or tube, where two external dimensions are smaller than 1 nm and the other dimension is larger than 100 nm;* *(c) the particle has a plate-like shape, where one external dimension is smaller than 1 nm and the other dimensions are larger than 100 nm.* ***The following are exempted from the requirement:*** • *Pigments. Nano-TiO2 is not considered a pigment.* • *Naturally occurring inorganic fillers in accordance with annex V point 7 in REACH.* • *Synthetic amorphous silica (SAS). This exemption applies to non-modified SAS. Chemically modified colloidal silica can be included in the products if the silica particles form aggregates in the final product. Surface-treated nanoparticles must fulfil requirement O3 (Classification of constituent chemical substances) and requirement O12 (Prohibited substances).* • *Unmodified calcium carbonate (grounded calcium carbonate, GCC) and unmodified precipitated calcium carbonate (PCC).* • *Polymer dispersions.*	Yes ☐	No ☐

If yes, please state if one of the above exceptions apply and add additional information if needed:

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Nordic Swan criterion O12 (096, 097), EU Ecolabel sub-criterion 4.1 and 4.3 (044, 056, 057):		
Does the raw material contain any of the following substances or substance groups?	Yes	No
If the answer to all the bulletins below is No, mark here	☐	☐
Substances on the REACH Candidate list of SVHC (Article 59(1)): http://echa.europa.eu/candidate-list-table)	☐	☐
Substances evaluated by the EU to be persistent, bioaccumulative, and toxic (PBT) or very persistent and very bioaccumulative (vPvB), in accordance with the criteria in Annex XIII of REACH and substances that have not yet been investigated, but which meet these criteria.	☐	☐
EU Ecolabel sub-criterion 4.3 (044, 056, 057): Substances classified as endocrine disruptors Category 1 or 2 under CLP, or identified as ED under BPR or PPP.	☐	☐
Nordic Swan criterion O12 (096, 097): Potential or identified endocrine disruptors according to any of the EU member state initiative "Endocrine Disruptor list" List I; List II; and/or List III • https://edlists.org/the-ed-lists/list-i-substances-identified-as-endocrine-disruptors-by-the-eu • https://edlists.org/the-ed-lists/list-ii-substances-under-eu-investigation-endocrine-disruption • https://edlists.org/the-ed-lists/list-iii-substances-identified-as-endocrine-disruptors-by-participating-national-authorities • Substances on the List II sublist "Substances no longer on list"? https://edlists.org/the-ed-lists/substances-no-longer-on-list-ii *If Yes, please write chemical name and CAS No. below. Nordic Ecolabelling will evaluate the circumstances on a case-by-case basis, through the background information indicated for the substance on the sublist.* • *2,2-dibromo-2-cyanoacetamide (DBNPA, CAS No. 10222-01-2)) used for disinfecting process water is exempted from the requirement as it is not constituent or part of the manufacturing of the product.* • *Butylated hydroxytoluene (BHT, CAS. no 128-37-0) is exempted up to 100 ppm in the final product.* • *3-iodo-2-propynyl butylcarbamate (IPBC, CAS No. 55406-53-6) is exempted, however see requirement Nordic Swan Criterion O5.* _____	☐	☐
Organotin compounds	☐	☐
Phthalates Esters of phthalic acid (ortho-phthalic acid / phthalic acid / 1,2- benzene dicarboxylic acid)	☐	☐
Bisphenol and bisphenol derivatives: *EC/List No. 201-245-8 (BPA), 201-025-1 (BPB), 401-720-1 (4,4'-Isobutylethylidenediphenol), 216-036-7 (BPAF) and its 8 salts (278-305-5; 425-060-9; 443-330-4; 468-740-0; 469-080-6; 479-100-5; 943-265-6; 947-368-7), 201-250-5 (BPS), 201-240-0 (BPC), 204-279-1 (TBMD), 201-618-5 (6,6'-di-tert-butyl-4,4'-butylidenedi-m-cresol), 242-895-2, 248-607-1, 405-520-5 (D8), 217-121-1 (DAB), 227-033-5 (TMBPA), 210-658-2 (BPF), 411-570-9, 277-962-5 (contains BPS, 500-086-4 (contains BPA), 500-263-6 (contains BPA), 500-607-5 (contains BPA), 701-362-9, 904-653-0 (contains BPA), 908-912-9 (contains BPF), 926-571-4 (contains BPA), 931-252-8 (contains BPA), 941-992-3 (contains BPS), 943-503-9 (contains BPA).*	☐	☐
APEO – alkylphenol ethoxylates and alkylphenol derivatives (substances that release alkylphenols on degradation).	☐	☐
Perfluorinated and polyfluorinated alkyl substances (PFAS)	☐	☐
Halogenated organic substances Exempted* are: • Preservatives that fulfil O5 (096, 097) • paint pigments that meet the EU's requirements concerning colourants in food packaging under Resolution AP (89) point 2.5 and • dries in oxidative drying paints (note: see O3). (096, 097) ** Perfluorinated and polyfluorinated alkyl substances are covered by their own bulletin and are not included in this exemption.*	☐	☐

Isocyanates Water-based polyisocyanates with a chain length of more than 10 are exempted, where the concentration of isocyanates with a chain length of less than 10 as an impurity is documented.	☐	☐
Fragrances	☐	☐
Boric acid, borates, and perborates	☐	☐
Ethylenediamine tetraacetate (EDTA) and its salts and Diethylenetriamine pentaacetate (DTPA)	☐	☐
EU Ecolabel criterion: Does the raw material contain synthetic polymer microparticles (SPMs, microplastics) as defined in entry 78 of Annex XVII to REACH that are used for **non-film forming purposes?** *Polymer dispersions used as film-forming binders are not considered SPMs for non-film-forming purposes.*	☐	☐
Anti-skinning agents	☐	☐
Driers (siccatives)	☐	☐
Crosslinking agents	☐	☐
Mineral raw materials	☐	☐
Neutralising agents	☐	☐
Optical brighteners	☐	☐
Silicone resin	☐	☐
Solvents	☐	☐
Surfactants	☐	☐
UV stabilisers	☐	☐

If the answer to any of the above questions is Yes, state the CAS No. (where possible), chemical name and level (in ppm, w% or mg / kg). If an exemption applies as above, please attach document as appropriate.
If the raw material contains synthetic polymer microparticles (SPMs) used for non-film-forming purposes, the level, purpose and justification of how their use improves the overall environmental performance of the final product must be stated.

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Nordic Swan criterion O14 (096), O16, O20, O24, O28, O32 and/or O36 (097), EU Ecolabel criterion 3 (044, 056, 057):		
Please state:	Yes	No
Does the raw material contain any VOC and/or SVOC? If the content of SVOC is unknown, please state this	☐	☐
Definitions of VOC and SVOC Volatile organic compounds (VOC) mean any organic compounds having an initial boiling point less than or equal to 250 °C measured at a standard pressure of 101,3 kPa as defined in Directive 2004/42/EC and which, in a capillary column, are eluting up to and including n-Tetradecane (C14H30). Semi volatile organic compounds (SVOCs) mean any organic compound having a boiling point greater than 250 °C and less than 370 °C measured at a standard pressure of 101,3 kPa and which, in a capillary column are eluting with a retention range after n-Tetradecane (C14H30) and up to and including n-Docosane (C22H46).		

Please state the VOC content in g/l:

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Please state the SVOC content in g/l:

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Declaration of paints and varnishes (Nordic Ecolabel) generation 4 (096)
Declaration of chemical building products (Nordic Ecolabel) generation 3 (097)
Declaration of indoor and outdoor paints and varnishes (EU Ecolabel) decision 2025/2607 (EU44, EU056, EU057)

Nordic Swan criterion O15 (096), O15, O19, O23, O27, O31 and/or O35 (097): *Applies to Nordic Swan 096 and 097 only*		
Please state the following:	Yes	No
Does the product contain any Volatile Aromatic Compounds (VAC)? *Volatile aromatic compounds are volatile organic compounds where one or more benzene rings are contained within the molecule.*	☐	☐

If yes, please state if actively added or as a residue in ppm:

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Nordic Swan criterion O16 (096), Nordic Swan criterion O13 (097): *Applies to Nordic Swan 096 and 097 only*		
Please state the following:	Yes	No
Does the raw material contain acrylic resins*? * Synthetic resin resulting from the polymerization or copolymerization of acrylic and/or methacrylic monomers, frequently together with other monomers e.g., styrene.	☐	☐
Does the raw material contain alkyd resins?	☐	☐

If the raw material does not contain acrylic or alkyd resins, disregard the following requirements.

If the raw material contains acrylic or alkyd resins, please state the origin of renewable raw material in the raw material (e.g., castor oil, soybean oil, palm oil…)

If the acrylic resin raw material contains palm oil (incl. by-products and waste fractions), please submit an RSPO-certificate. Alkyd resins may not contain renewable raw materials from palm oil.

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Please state where the renewable raw materials used in the binder are derived from:		
No traceability	☐	
Primary feedstock	☐	
Residue	☐	
Waste	☐	
	Yes	No
Is the renewable raw material sustainability certified?	☐	☐

If yes, state the raw material sustainability certification system:

_____

If a raw material sustainability certification system is used, state the level of traceability (shown in a Chain of Custody certificate where applicable)	
No traceability	☐
Identity preserved	☐
Segregated	☐
Mass Balance	☐
Book & Claim	☐

Nordic Swan criterion O17 (096), Nordic Swan criterion O14 (097): *Applies to Nordic Swan 096 and 097 only*		
Please state the following:	Yes	No
Does the raw material contain cement or alternative hydraulic binder?	☐	☐

If the answer to the above question is Yes, the raw material manufacturer must enclose documentation in accordance with requirement O17 (096) or O14 (097) of the criteria document showing that the requirements are met.

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Place and date:	Company name/stamp:
Is the company a manufacturer or other kind of supplier of the raw material? ☐ Manufacturer ☐ Other kind of supplier (please specify): _____	
Responsible person:	Signature of responsible person, electronic signature is accepted:
Phone:	Email:

Declaration of paints and varnishes (Nordic Ecolabel) generation 4 (096)
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