

Appendix 1 Declaration from the manufacturer of the paint or varnish

To be used in conjunction with an application for a licence for the Nordic Ecolabelling paint and varnishes. To complete the following declaration, you will need declarations for all raw materials (Appendix 2 or equivalent declaration) and Appendix 3 or equivalent declaration).

Declaration is made by the manufacturer 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.

Product name: _____

Product's function/product group (e.g., paint, masonry coatings) with subcategory denotation according to Directive 2004/EC) if relevant:

The requirements in the criteria document and accompanying appendices apply to all ingoing substances in the Nordic Swan Ecolabelled paint and varnish. Impurities are not regarded as ingoing substances and are exempt from the requirements.

Ingoing substances and impurities are here defined as below, unless stated otherwise in the requirements. Be aware that these are not the same definitions as in REACH ((EU) 1907/2006) and CLP ((EU) 1272/2008).

- **Ingoing substances:** all substances in the Nordic Swan Ecolabelled 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 Nordic Swan Ecolabelled product in concentrations less than 100 ppm (0,0100 w%).
- Impurities in the raw materials exceeding concentrations of 10 000 ppm (1.0000 w%) are always regarded as ingoing substances, regardless of the concentration in the Nordic Swan Ecolabelled 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.

O2 Classification of the product		
Is the product classified with any of the hazard phrases below? <i>Including all combinations of stated exposure routes and stated specific effect. For example, H350 also covers classification H350i.</i>	Yes	No
If the answer to all the classifications below is No, mark here		☐
H400 – Toxic to aquatic life, Acute 1	☐	☐
H410 – Toxic to aquatic life, Chronic 1	☐	☐
H411 – Toxic to aquatic life, Chronic 2	☐	☐
H412 – Toxic to aquatic life, Chronic 3	☐	☐
H413 – Toxic to aquatic life, Chronic 4	☐	☐
H350 – May cause cancer, hazard category 1A and 1B	☐	☐
H351 – Suspected of causing cancer, hazard category 2	☐	☐
H340 – May cause genetic defects, hazard category 1A and 1B	☐	☐
H341 – May cause genetic defects, hazard category 2	☐	☐
H360 – Toxic for reproduction, hazard category 1A and 1B	☐	☐
H361 – Toxic for reproduction, hazard category 2	☐	☐
H362 – Toxic for reproduction, effects on or through breastfeeding (supplementary cat.)	☐	☐
EUH380 – Endocrine disruption for human health, category 1	☐	☐
EUH381 – Endocrine disruption for human health, category 2	☐	☐
EUH430 – Endocrine disruption for the environment, category 1	☐	☐
EUH431 – Endocrine disruption for the environment, category 2	☐	☐
EUH440 – Persistent, Bioaccumulative and Toxic properties	☐	☐
EUH441 – Very Persistent, Very Bioaccumulative properties	☐	☐
EUH450 – Persistent, Mobile, and Toxic properties	☐	☐
EUH451 – Very Persistent, Very Mobile properties	☐	☐
H300 – Acute toxicity	☐	☐
H310 – Acute toxicity	☐	☐
H330 – Acute toxicity	☐	☐
H301 – Acute toxicity	☐	☐
H311 – Acute toxicity	☐	☐
H331 – Acute toxicity	☐	☐
H302 – Acute toxicity	☐	☐
H312 – Acute toxicity	☐	☐
H332 – Acute toxicity	☐	☐
H370 – Specific target organ toxicity: single exposure and repeated exposure	☐	☐
H371 – Specific target organ toxicity: single exposure and repeated exposure	☐	☐
H372 – Specific target organ toxicity: single exposure and repeated exposure	☐	☐
H373 – Specific target organ toxicity: single exposure and repeated exposure	☐	☐
H304 – Aspiration hazard	☐	☐
H334 – Respiratory sensitising	☐	☐
H317 – Skin sensitising	☐	☐
H200 – Unstable explosive	☐	☐
H201 – Explosive: mass explosion hazard	☐	☐
H202 – Explosive: severe projection hazard	☐	☐
H203 – Explosive: fire, blast or projection hazard	☐	☐
H204 – Fire or projection hazard	☐	☐
H205 – May mass explode in fire	☐	☐

H206 – Fire, blast, or projection hazard: increased risk of explosion if desensitizing agent is reduced	☐	☐
H271 – May cause fire or explosion: strong oxidizer	☐	☐
H272 – May intensify fire: oxidizer	☐	☐
H240 – Heating may cause an explosion	☐	☐
H241 – Heating may cause a fire or explosion	☐	☐
H242 – Heating may cause a fire	☐	☐
H222 – Flammable material	☐	☐
H224 – Extremely flammable liquid and vapour	☐	☐

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.

O3 Classification of ingoing substances		
Does the product contain substances classified with any of the hazard phrases below? <i>Including all combinations of stated exposure routes and stated specific effect. For example, H350 also covers classification H350i.</i>	Yes	No
If the answer to all the classifications below is No, mark here		☐
H350 – May cause cancer, hazard category 1A and 1B	☐	☐
H351 – Suspected of causing cancer, hazard category 2	☐	☐
H340 – May cause genetic defects, hazard category 1A and 1B	☐	☐
H341 – May cause genetic defects, hazard category 2	☐	☐
H360 – Toxic for reproduction, hazard category 1A and 1B	☐	☐
H361 – Toxic for reproduction, hazard category 2	☐	☐
H362 – Toxic for reproduction, effects on or through breastfeeding (supplementary category)	☐	☐
H334 – Respiratory sensitising 1 / 1A / 1B	☐	☐
H370 – Specific organic toxicity, STOT SE 1	☐	☐
H372 – Specific organic toxicity, STOT RE 1	☐	☐
EUH380 – Endocrine disruption for human health, category 1	☐	☐
EUH381 – Endocrine disruption for human health, category 2	☐	☐
EUH430 – Endocrine disruption for the environment, category 1	☐	☐
EUH431 – Endocrine disruption for the environment, category 2	☐	☐
EUH440 – Persistent, Bioaccumulative and Toxic properties	☐	☐
EUH441 – Very Persistent, Very Bioaccumulative properties	☐	☐
EUH450 – Persistent, Mobile, and Toxic properties	☐	☐
EUH451 – Very Persistent, Very Mobile properties	☐	☐

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 point O7 instead.

O4 Environmentally harmful substances		
Does the product contain any substances classified as harmful to the environment with the following risk phrases or combinations of them?	Yes	No
H410 – Toxic to aquatic life, Chronic 1	☐	☐
H411 – Toxic to aquatic life, Chronic 2	☐	☐
H412 – Toxic to aquatic life, Chronic 3	☐	☐

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.

O4 Environmentally harmful substances		
Does the product fulfil the requirement regarding maximum content of substances classified as harmful to the environment?	Yes	No
	☐	☐

Please do calculation below clearly showing that requirement is fulfilled:

O5 Preservatives		
Does the product contain any preservatives?	Yes	No
	☐	☐
If yes , please state: Does the preservatives comply with product-type 6 and product-type 7 according to Regulation (EU) No 528/2012 (The Biocidal Products Regulation)?	☐	☐
If yes , please state: Does the product fulfil the requirement regarding maximum contents of preservatives and total isothiazolinones according to Table 5 and Table 6 of the criteria document?	☐	☐

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) and calculation showing that the requirement for total amount of preservatives and isothiazolinones is fulfilled.

O6 Formaldehyde		
Does the product contain formaldehyde or formaldehyde releasing agents?	Yes	No
If yes, please state: Is the product an indoor paint or varnish? If yes, please attach test report according to requirement O6, e.g., EN 16516	☐	☐
If yes, please state: Is the product an outdoor paint or varnish or industrial paint? If yes, please attach test report according to requirement O6 e.g., EPA 8315A, VdL-RL03, Merckoquant method, HPLC	☐	☐
O7 Residual monomers		
Does the product contain residual monomers in polymers present in product > 1% 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, hazard category 1A and 1B	☐	☐
H351 – Suspected of causing cancer, hazard category 2	☐	☐
H340 – May cause genetic defects, hazard category 1A and 1B	☐	☐
H341 – May cause genetic defects, hazard category 2	☐	☐
H360 – Toxic for reproduction, hazard category 1A and 1B	☐	☐
H361 – Toxic for reproduction, hazard category 2	☐	☐
H362 – Toxic for reproduction, effects on or through breastfeeding (supplementary category)	☐	☐
H334 – May cause allergy or asthma symptoms or breathing difficulties if inhaled 1 / 1A / 1B	☐	☐
H370 – Specific target organ toxicity: STOT SE 1 or 2	☐	☐
H371 – Specific target organ toxicity: STOT SE 1 or 2	☐	☐
H372 – Specific target organ toxicity: STOT RE 1 or 2	☐	☐
H373 – Specific target organ toxicity: STOT RE 1 or 2	☐	☐

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) 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).

O8 Heavy metals		
Does the product contain any heavy metals (cadmium, lead, chromium VI, mercury, arsenic, barium, selenium, antimony)? <i>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.</i> <i>- Barium sulphate and other insoluble barium compounds are exempted.</i> <i>- 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)*.</i>	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 antimony in pigments that are exempted by the above terms, please attach test according to test method DIN 53770-1 or equivalent, showing that terms are fulfilled).

O9 Titanium dioxide		
Does the product contain titanium dioxide?	Yes ☐	No ☐

If yes, please state amount in w% and raw material manufacturer name. If the product contains more than 3.0 w% titanium dioxide, the raw material manufacturer must supply information in accordance with requirement O9 in the criteria document.

O10 Powdered raw materials		
Have any of the raw materials used in the product been in powder form?	Yes ☐	No ☐

If yes, please attach documentation describing how powdered raw materials have been handled during the production process in accordance with requirement O10 in the criteria document.

O11 Nanomaterials/-particles		
Does the product contain nanomaterials/-particles? <i>Nanomaterials/-particles are defined according to the EU Commission Recommendation on the Definition of Nanomaterial (2022/C 229/01):</i> <i>'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:</i> <i>(a) one or more external dimensions of the particle are in the size range 1 nm to 100 nm;</i> <i>(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;</i> <i>(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.</i> 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:

O12 Prohibited substances		
Does the product 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: 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.	☐	☐
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 2,2-dibromo-2-cyanoacetamide (DBNPA, CAS No. 10222-01-2) is exempted from the requirement. https://edlists.org/the-ed-lists/list-ii-substances-under-eu-investigation-endocrine-disruption - 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 O5. 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.	☐	☐
Organotin compounds	☐	☐
Phthalates Esters of phthalic acid (ortho-phthalic acid / phthalic acid / 1,2- benzene dicarboxylic acid)	☐	☐
Bisphenols 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 - 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). * 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	☐	☐

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.

O13 Emissions of Volatile and Semi-Volatile Organic Compounds in indoor paints and varnishes		
Please state:	Yes	No
Product description (with subcategory denotation according to Directive 2004/EC):		
a. Interior matt walls and ceilings (Gloss < 25@60°)	☐	☐
b. Interior glossy walls and ceilings (Gloss > 25@60°)	☐	☐
d. Interior trim and cladding paints for wood and metal	☐	☐
e. Interior trim varnishes and woodstains, including opaque woodstains	☐	☐
f. Interior and Exterior minimal build woodstains	☐	☐
g. Primers	☐	☐
h. Binding primers	☐	☐
i. One-pack performance coatings	☐	☐
j. Two-pack reactive performance coatings for specific end use such as floors	☐	☐
l. Decorative effect coatings	☐	☐
Does the emission of the final product meet the emission limits as stated in Table 10 of requirement O13?	☐	☐
Please attach test report in accordance with EN 16516, EN 16402 or other equivalent standardised test conditions and determination methods. TVOC and TSVOC are defined as stated in EN 16516 and carcinogenic 1A and 1B VOCs are listed in Annex H of EN 16516.		
O14 Content of Volatile and Semi-volatile Organic Compounds in paints and varnishes		
Please state:	Yes	No
Product description (with subcategory denotation according to Directive 2004/EC):		
c. Exterior walls of mineral substrate	☐	☐
d. Exterior trim and cladding paints for wood and metal	☐	☐
e. Exterior trim varnishes and wood stains, including opaque wood stains	☐	☐
f. Exterior minimal build wood stains	☐	☐
g. Primers	☐	☐
h. Binding primers	☐	☐
i. On pack performance coatings	☐	☐
j. Two-pack reactive performance coatings for specific end use such as floors	☐	☐

Please state: Product description for products falling outside of the scope of Directive 2004/42/EC	Yes	No
Industrial paints and varnishes	☐	☐
Industrial paints and varnishes for outdoor use	☐	☐
Industrial anti-corrosion paints	☐	☐
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. 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.	☐	☐

Please state the VOC content in g/l ready-to-use of the final product in accordance with ISO 11890-2*.

Please state the SVOC content in g/l ready-to-use of the final product in accordance with ISO 11890-2*.

* Attach ISO 11890-2 test report for the final product or calculation based on all ingoing raw materials.

O15 Volatile Aromatic Compounds		
Please state the following:	Yes	No
Does the product contain any Volatile Aromatic Compounds (VAC)? <i>Volatile aromatic compounds are volatile organic compounds where one or more benzene rings are contained within the molecule.</i>	☐	☐
If yes, please state if actively added or as a residue in ppm: 		
O16 Acrylic and alkyd resin binders		
Please state the following:	Yes	No
Does the product contain acrylic resins*? <i>* Synthetic resin resulting from the polymerization or copolymerization of acrylic and/or methacrylic monomers, frequently together with other monomers e.g., styrene.</i>	☐	☐
Is the acrylic resin based on renewable raw material or feedstock?	☐	☐
Does the product contain alkyd resins?	☐	☐

If the answer to the above questions is Yes, state the proportion of acrylic/alkyd resins made from renewable raw material. Please attach enclosed procedures for policy or equivalent documentation of the work with environmental goals, showing fulfilment of the requirement. The manufacturer of the raw material must enclose documentation in accordance with the requirement and appendix 2 and documentation showing valid certificates if palm oil is used for acrylic resins.

Place and date:	Company name/stamp:
Responsible person:	Signature of responsible person:
Phone:	Email: