



CEPE Guideline

„Classification of Decorative Coatings into Categories for the Directive 2004/42/EC”

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Issued by CEPE, the European Council of Paint, Printing Inks and Artists' Colours Industry

Preface

This guidance document was prepared by the Technical Committee Decorative Paints (TC Deco) and approved by the Decorative Paint Product Oriented Group (POG Deco) of CEPE. The aim is to help paint manufacturers, their customers, relevant authorities, and the public to decide or to assess which of the 12 subcategories of Annex I – Par. 1 of the Directive 2004/42/EC (“Decopaint-Directive”, “the Directive”) a decorative coating material belongs to.

The document presents a classification of local product types in the framework of the 12 subcategories. It gives also some advice on product types that are out of scope of the directive. Annex I of the Directive defines different VOC limits for water-borne and solvent-borne products in each subcategory: This guideline only clarifies the subcategory to which a paint type belongs. The relevant VOC limit will depend on whether the coating is water-borne or solvent-borne.

CEPE aim to create a uniform classification scheme across Europe with examples in order to avoid misinterpretation of the directive and wrong classification of products.

1 Introduction

Decorative coatings (architectural coatings) are widely used for the decoration and protection of buildings, architectural components, and building parts made from various materials. Depending on the type of a coating material the Directive 2004/42/EC sets different limit values for the maximum content of volatile organic compounds (VOC). The occurrence of a multitude of decorative coatings in the market and their different applications on various substrates and their classification into 12 subcategories is a challenge even for experts. CEPE and experts from national paint manufacturers associations have reviewed a large number of decorative coatings and their local names, to sort them into one of the existing subcategories of 2004/42/EC or to consider them as out of scope of the directive.

The result is presented as a set of tables describing the subcategory according to 2004/42/EC in the local language of a country and in English and subsequently the names or product types in local language together with an English interpretation. Remarks on product types that are out of scope are made for clarification only, they are presented in a separate table, Annex C, but

they do not represent a complete list of such products.

2 Scope

This CEPE Guideline is applicable to decorative coatings according to the Directive 2004/42/EC (ANNEX I – Par. 1). It is not applicable to coatings which are – by claim of the manufacturer - not to be used for the coating of buildings, building components, and/or their trim and fittings. The Guideline is also not applicable to vehicle refinishing coatings although the Directive 2004/42/EC deals also with vehicle refinishing.

3 Definitions

For definitions (coatings, film, etc.) see Directive 2004/42/EC (Art. 2) – in case of doubt use the English version.

Special attention has to be given to the definition of “building”. For the purpose of this guideline a building is a construction enclosed by walls and covered by a roof.

If necessary a more detailed definition can be applied:

A building is a constructed edifice designed to stand more or less permanently, covering a space of land, usually covered by a roof and more or less completely enclosed by walls and serving as a dwelling, storehouse, factory, shelter for animals, or other useful structure – distinguished from structures not designed for occupancy (as bridges or monuments) and from structures not intended for use in one place (as boats or trailers) even though subject to occupancy.

(Source: Webster's Third New International Dictionary of the English Language, unabridged, 1993)

4 Classification process

Experts of the CEPE TC Deco have asked national associations to send in lists of products or product types relevant in their country/market and to deliver their English interpretation. Responses were received from the national associations of Belgium IVP, Denmark FDLF, France FIPEC, Germany VdL, Italy AVISA, The Netherlands VVVF, Portugal APFTV, Spain ASEFAPI, Sweden SVEFF, and United Kingdom BCF. The responses were reviewed and discussed by the TC Deco.

A draft proposal was sent to the local organizations for corrections and comments. Comments and corrections were considered to ensure no conflict with the text and with the intention of the directive.

The final document was approved in the TC Deco and in the POG Deco and consequently released for publication.

Due to the large number of products in the EC market more questions may come up and need decision. CEPE Deco POG and the TC Deco may extend and improve the present edition. Any important question should be addressed to the national paint manufacturers association; if necessary the association may contact CEPE Offices to obtain clarification.

5 Principles of Classification

Coatings are classified according to their intended use as recommended by the manufacturer. In case of recommended uses which cover more than one subcategory of the directive the one with the lowest VOC level should apply.

Example 1: *If a mat coating material is recommended for use on both interior and exterior walls then it has to be classified according to the lower VOC limits of the (interior) subcategory “a”.*

Coatings may have application recommendation inside and outside the scope of the directive. For such products, any recommendation for use which comes under the directive means that the product has to be classified according to the relevant subcategory of the Directive. 2004/42/EC.

Example 2: *If an opaque paint is recommended for the use on furniture (out of scope) and for windows frames (inside scope) then it has to be classified in subcategory “d” of the Directive. 2004/42/EC.*

If - on the other hand - a coating material is claimed for the application on furniture (out of scope of the Directive 2004/42/EC) it may also be used for the application of component parts of a set of furniture *irrespective* if those components will be fixed to the building or not.

Many coatings deliver aesthetic effects, however decorative effect coatings as defined in the subcategory “i” are defined as “coatings designed to give special aesthetic effects over specially prepared pre-painted substrates or base coats and subsequently treated with various tools during the drying period.” Therefore coating materials which deliver their effects such as colour and/or texture directly from application are not classified in the subcategory “i” but in the relevant subcategory of their intended use. However, for multicoloured coatings the subcategory “k” applies.

Example 3: *A coating with metallic pigments for wood applied by standard application methods like with roller, brush or spray gun, and not treated during drying with a special tool, should be classified in subcategory “d” and not in subcategory “i”.*

(Examples of “special tools”: spatula, rag roller, sponge, plastic foil, etc.)

If a one-pack product claims special performance such as adhesion to difficult substrates (like non-ferrous metals, galvanized steel) it should be classified in subcategory “i”.

Example 4: *If an opaque coating is claimed as “Universal Primer” but it does not claim special performance on difficult substrates like aluminium, galvanised steel, copper, special plastics it is classified in subcategory “d”, and not in “i”, “g”, or “h”.*

The classification of a product is independent of the question if it comes under the Biocidal Products Directive (BPD) or not.

Example 5: *Wood preservatives based on biocides can be within or outside the scope of the Directive 2004/42/EC. If wood preserving biocide(s) is (are) used in a coating material intended to form a film the preparation is within the scope. - If the intended use of a preparation is to provide chemical wood protection only it may contain resins for fixing the active ingredients in the wood and protecting them against washing out. Since the intended use is not to form a film on the wood surface it is not a coating material, and therefore it is out of scope.*

If a wood preservative is specified as “out of scope” it is very important to make sure that the text on packaging and on all data sheets, MSDS etc. and in all literature is compliant with this specification. Such product must not be recommended as a coating material or providing a combination of coating and wood preservative functions.

Base paints as semi-finished goods of products within the scope of the Directive come under the Directive. Semi-finished products – like colorants - are out of scope if they as such cannot be used for producing a coating.

Example 6: *Base paints of finished products within the scope of the Directive are to be classified in one of the subcategories of the Directive. They should be labelled with the highest VOC value that can result from the prescribed tinting procedure/tinting system, including VOC from any recommended thinning. They belong to the same subcategory as the relevant finished products, see below Annex A and Annex B.*

Colorants which can be used as coatings of one of the subcategories of the Directive come under the Directive.

If a colorant or a range of them is formulated as semi-finished products in a way not providing a useful coating when applied to a substrate, it is out of scope. Label and data sheets may only recommend its use for tinting base paints.

6 Table of Classification

See Annex A and Annex B

7 Table “Out of Scope”

See Annex C

8 User information

This CEPE Guideline is not intended to be used by CEPE member organizations only. Other interested organizations are welcome to apply it and to refer to it. Nevertheless, the reference to this Guideline constitutes the acceptance of the Guideline in its entirety.



When widely used the Guideline is an effective measure against trade barriers which may be caused simply by different classification of products by the authorities of different member states. This Guideline is a dynamic document, further contributions are still welcome.

9 References

Directive 2004/42/EC

DIRECTIVE 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

Annex A “Classification of Products according to the Directive 2004/42/EC”
arranged according to subcategories

Annex B “Classification of Products according to the Directive 2004/42/EC”
arranged according to countries

Annex C Informative Annex “Products out of Scope”