

## Using this manual

This manual guides you through the process of applying for an EU Ecolabel licence, in accordance with the applicable criteria requirements. The following symbols are used throughout it:



= Notable or important information.



= Clarification of a key point.



= Required documentation to verify compliance with criteria, including links to declarations where needed.

The manual is structured as follows:

**Part A: General Information** – Provides information about the EU Ecolabel (including a summary of the criteria), details of the application process, and answers to frequently asked questions about applying.

**Part B: Product Assessment and Verification** – Outlines the criteria for a specific product group set out in the Commission Decision. An example from this section is shown below:

Product group criterion

Important information

#### 3(c) Adhesion

Pigmented masonry primers for exterior uses shall score a pass in the EN 24624 (ISO 4624) pull-off test where the cohesive strength of the substrate is less than the adhesive strength of the paint, otherwise the adhesion of the paint must be in excess of a pass value of 1,5MPa.

Floor coatings, floor paints, floor undercoats, interior masonry primers, metal and wood undercoats shall score 2 or less in the EN 2409 test for adhesion.



Transparent primers are not included in this requirement.

The applicant shall evaluate the primer and/or finish alone, or both applied together. When testing the finish alone this shall be considered the worst case scenario concerning adhesion.

Clarification of a key point in the criterion

Interpretation of criterion: The important adhesion characteristics here are for a 'system' that would be applied by a user. If a finish, that requires a recommended primer, is being assessed for the EU

Ecolabel this 'system' should be tested (regardless of whether the primer is an EU Ecolabelled product). If the finish does not require a primer, only the finish should be tested. If it is the primer that is being assessed, the test should be performed on this paint only.

Outline of documentation needed for application, to show compliance with the criterion—including link to

a template declaration form

Required documentation for Assessment and verification: Adhesion

- The applicant shall provide a test report using the method EN ISO 2409 or EN 24624 (ISO 4624) as applicable.
- Template declaration: Adhesion

Part C: Application Form - This application form should be completed by all applicants.

**Part D: Declarations** – These declarations are to be completed as part of the application process. The relevant sections of Part B (Product Assessment and Verification) should be referred to when completing these declarations. An example declaration is shown below:



Title and reference to relevant criterion

Declaration, including sections to be completed by the applicant and/or supplier(s)

Information to be completed by the person responsible for this declaration

Declaration: Criterion 2 – TiO2 declaration of non/low use		
to be completed by the applicant		
(Please complete if the paint or varnish contains	less than 3.0% w/w TiQ2)	
As the manufacturer/importer/retailer for paints and varnishes that comply with the EU Ecolabel, I, the undersigned,		
Signature of person bearing legal responsibility:		
Position held		
Date:		
Company Stamp:		

Please read this manual all the way through before completing and submitting the application form or any other documentation. EU Ecolabel Competent Bodies can help licence holders understand the EU Ecolabel criteria and can provide guidance on how to assemble an application dossier.

## Part A: General Information

#### 1 Introduction

This User Manual<sup>1</sup> is designed to help you apply for the EU Ecolabel. It includes an outline of all data, tests and documentation that are required to demonstrate compliance.

The basis for the manual is a Commission Decision establishing the ecological criteria for the award of the EU Ecolabel for a specific product group. A copy of the criteria can be found at:



http://ec.e<u>uropa.eu/environment/ecolabel/products-groups-and-criteria.html</u>



Please read the criteria document carefully before filling in the application form!

## 1.1 Is my product eligible for the EU Ecolabel?

Information on which type of products are included in the scope of the product group can be found in Article 1 of the Commission Decision establishing the ecological criteria, as well as which products are not eligible for the EU Ecolabel

#### 1.2 Aims of the criteria

The EU Ecolabel seeks to minimise the various environmental impacts at each stage of a product's life. The criteria are set at levels that promote products which have a lower overall environmental impact.

The validity of the EU Ecolabel criteria can be found at:



http://ec.europa.eu/environment/ecolabel/products-groups-and-criteria.html

For those who already hold an EU Ecolabel licence for a product and who are re-applying, the table in Appendix 2 details the significant changes between the old and new criteria.

## 1.3 Who can apply for the EU Ecolabel?

Manufacturers, importers and service providers may submit applications for the award of the EU Ecolabel. Traders and retailers may also apply, but may only submit applications for products marketed under their own brand names.

<sup>&</sup>lt;sup>1</sup> This User Manual is for guidance only; it does not have any legal standing and does not, in any way, replace the Commission Decision or any relevant legislation. In case of doubt on specific points in the Manual, please refer directly to the national Competent Body.



## 1.4 Where do I apply?

EU Ecolabel applications are made via a single application that covers all of the European Economic Area (EEA).

Every country has a representative, known as a Competent Body, which assesses the applications. The choice of which country you should apply to is determined by the EEA Member State in which the product originates. If your product originates from outside the EEA, you should apply to the EEA Member State in which the product is (or is about to be) placed on sale.

All EEA Member States assess applications against the same criteria, but individual States have slightly different procedures and fee levels for handling applications. For contact details for each Member State's Competent Body, please visit:



http://ec<u>.europa.eu/environment/ecolabel/competent-bodies.html</u>

### 1.5 What does an application/contract cover?

An application for an EU Ecolabel can cover a single product or a range of products, regardless of how many different names or brands are used for that product(s). Therefore, the applicant must report all the trade names or manufacturer's internal reference numbers of the product(s) in question during the process of application. In the case of a formulation, all chemical substances and mixtures used in the product must be submitted as part of the application.

# 1.6 How do I extend or make changes to my EU Ecolabel licence?

Once the EU Ecolabel has been awarded, if the licence holder wants to extend the range of products covered by the licence, the following conditions apply:

- Extension with new manufacturer's internal reference numbers/trade names, which do not
  affect compliance with the criteria: In this case, the relevant information should be sent to
  the Competent Body. After scrutiny, and if approved, the Competent Body will issue a
  revised licence with the new/additional manufacturer's internal reference numbers/trade
  names added.
- Extension or modification with new technical characteristics which affect compliance with the criteria (for example new materials): These must be approved by the Competent Body before use. A request for extension must be sent to the Competent Body together with all the necessary supporting documentation as required in the *Assessment and verification* section(s) of the relevant affected criterion/criteria.
- Addition or substitution of new suppliers: Any new supplier(s) must be approved by the Competent Body. The Competent Body shall be provided with appropriate documentation proving the suppliers' compliance with the criteria. In addition, an updated list of suppliers must be provided to the Competent Body.
- Any other changes which do not affect compliance with the criteria shall also be reported to the Competent Body.



1.7 Continuous control — the responsibility of the applicant

The applicant is responsible for ensuring that the product(s) or service(s) once awarded the EU Ecolabel, always remain in compliance with the EU Ecolabel criteria.

After an EU Ecolabel licence has been granted, the licence holder must keep the application dossier up to date. In cases where continued tests or measurements are required, the licence holder is responsible for keeping a record of the test results and other relevant documentation. This documentation may not need to be sent to the Competent Body, unless there is a specific requirement to do so (which will be set out in the relevant criterion), but must be available at any time if requested.

If at any time during the validity period of the EU Ecolabel licence the product is no longerin compliance with the criteria, this must be reported to the Competent Body immediately, together with a statement of the reasons for non-compliance. The Competent Body will decide what action to take, e.g. a demand for additional measurements, suspension of the licence, etc.

### 1.8 Assessment of compliance with the criteria

The Competent Body may undertake any necessary investigations to monitor the licence holder's ongoing compliance with the EU Ecolabel criteria and the terms of use and provisions of the contract. To this end, the Competent Body may request, and the licence holder shall provide, any relevant documentation to prove such compliance.

Furthermore, the Competent Body may, at any reasonable time and without notice, request, and the licence holder shall grant, access to the premises.

#### 1.9 Costs

The applicant is responsible for compiling the application and obtaining all the necessary supporting evidence, which may include tests, etc.

In addition, the applicant must pay an application fee<sup>2</sup>, and an annual licence fee where this is asked for by the Competent Body. In some cases, applicants may be charged for an on-site verification, which may include travel and accommodation costs. Subsequent to the award of the EU Ecolabel licence, Competent Bodies may also charge for extension/modification fees and on-site inspections. Further information can be found at:



http://ec.europa.eu/environment/ecolabel/documents/eu-ecolabel\_fees.pdf

<sup>&</sup>lt;sup>2</sup> According to the Commission Regulation (EU) No 782/2013 of 14 August 2013 amending Annex III to the Regulation (EC) No 66/2010 of the European Parliament and of the Council on the EU Ecolabel (OJ L 219, 15.8.2013, p. 26).



#### **EU ECOLABEL USER MANUAL**

#### Part A: General Information

## 2 The application process

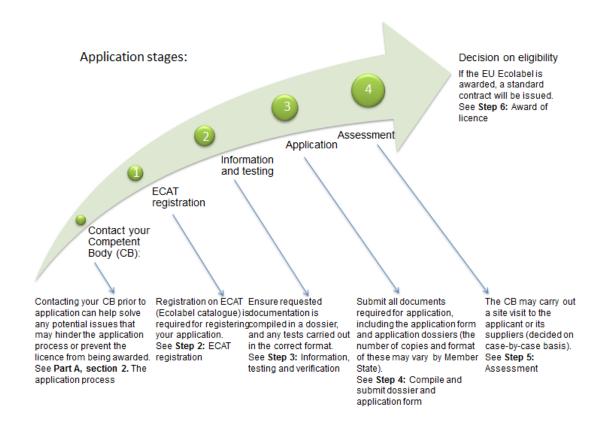
The first step in starting the application process is to contact your Competent Body, as they can help you compile your application. See section above 'Where do I apply?' to find out which Competent Body(ies) you should apply to.

The contact details of all the EU Ecolabel Competent Bodies are available at:



http://ec<u>.europa.eu/environment/ecolabel/competent-bodies.html</u>

The figure below outlines the stages involved in applying for the EU Ecolabel<sup>3</sup>. Further detail is given in the explanations that follow.



<sup>&</sup>lt;sup>3</sup> Since the structure of EU Ecolabel Competent Body varies across Member States, application fee deadlines are not outlined within this diagram. Applicants should contact their Competent Body directly for fee deadlines.



### Step 1: Contact your Competent Body (CB)

The EU Ecolabel Competent Bodies can help potential licence holders to understand the EU Ecolabel criteria and can provide guidance on how to assemble an application dossier.

### Step 2: ECAT registration

The online tool **ECAT** (the online EU Ecolabel E-Catalogue), must be used to initially register your application for an EU Ecolabel licence.

Follow the instructions on the E-Catalogue User Manual which you can download from <a href="http://ec.europa.eu/environment/ecolabel/ecolabelled">http://ec.europa.eu/environment/ecolabel/ecolabelled</a> products/pdf/user manual/Ecat admin%20user <a href="manual%20for%20Applicants.pdf">%20manual%20for%20Applicants.pdf</a>. This user manual outlines the process for registration, which includes registering products and services under the European Commission Authentication Service (ECAS) system. If you encounter problems with the ECAT system, contact the <a href="EU Ecolabel Helpdesk">EU Ecolabel Helpdesk</a>.

### Step 3: Information, testing and verification requirements

Use the criteria document, and the information and checklists in this User Manual, to assemble a dossier containing all the information and test results needed to show how the product has met each criterion. Each criterion will include a section setting out the assessment and verification requirements which may include product tests, declarations of compliance, or independent verification. It is essential that data is accurate and substantiated; further checks may be carried out by the Competent Body if deemed appropriate.

Whenever the assessment and verification of EU Ecolabel criteria requires product tests, those tests should be preferably performed by laboratories that meet the general requirements of EN ISO 17025 or equivalent, for that specific test. More information can be found in the "Guidelines for a procedure for checking the criteria in respect of applications: use of test laboratories". Contact your <a href="Competent Body">Competent Body</a> if you need any additional information concerning which laboratory to use.

All test and independent verification costs must be met by the applicant. You should factor in these costs before you decide to apply.

### Step 4: Compile and submit dossier and application form

Please note that a dossier, comprising an application form with all the above supporting documentation, will need to be submitted to the relevant Competent Body. If your application is successful, you will be expected to retain a copy of the dossier and keep it up to date for the duration of your licence.

For information on the specific format and additional guidance documents, please contact your Competent Body.



### Step 5: Assessment

After receiving an application, the Competent Body examines the documentation including any material sent directly by suppliers and respond to the applicant within two months of receipt of an application. The Competent Body may make a list of any additional documentation required in order to comply with the EU Ecolabel product group criteria. This list will be forwarded to the applicant who must ensure that the relevant documentation is provided.

It should also be noted that a Competent Body can reject an application if sufficient documentation is not received within 6 months of any request for further information.

After all the documentation has been approved, the Competent Body may carry out an on-site visit to the applicant and/or its suppliers. The Competent Body makes this judgement on a case-by-case basis and may charge a fee for it. Again, please contact your Competent Body for details.

### Step 6: Award of licence

When the application has been assessed and is approved by the Competent Body, a contract is issued, which sets out the range of products covered, including any trade names or manufacturer's internal reference numbers. This contract sets out the terms of use of the EU Ecolabel, following the standard contract in Annex IV of the Regulation (EC) No 66/2010 of 25 November 2009.

Once the contract is signed by the applicant, a certificate can be asked for/will be sent, depending on the Competent Body. This certificate will detail:

- the licence number that can be used with the EU Ecolabel logo;
- · the legal name of the applicant;
- · the range of products awarded the EU Ecolabel;
- all relevant trade names under which the product is sold.

The Competent Body will advise on when the EU Ecolabel logo and licence number can be used on the relevant products.

The logo must be used in accordance with the EU Ecolabel Logo guidelines, which can be found at:



http://ec.europa.eu/environment/ecolabel/documents/logo\_guidelines.pdf

### 2.1 Revision of criteria

The criteria for each product group are revised every three/four years, and existing EU Ecolabel holders have to re-apply when these new, revised criteria come into force. Therefore, it is advisable to consider the timing of your application to avoid consecutive application and then re-application against new criteria. A transition period for adjusting the product(s) and applying for re-assessment is usually allowed for and is set out in the new criteria document.



For more information about the application process visit the EU Ecolabel website at:

http://ec.europa.eu/environment/ecolabel/how-to-apply-for-eu-ecolabel.html





## 2.2 Checklist: How to apply

Reference	Requirement	Tick when complete
1.1	Ensure product is eligible for the EU Ecolabel	
Web link	Download the relevant product group criteria	
<u>1.4</u>	Identify the Competent Body in the relevant Member State you can apply to	
<u>1.4</u>	Contact the relevant Competent Body and notify them of your intention to apply for an EU Ecolabel licence	
2.1	Check if the criteria relating to your product(s) or service are due to be revised or updated in the near future <sup>4</sup>	
2. Step 1	Request information on application forms from your Competent Body	
2. Step 2	Register on ECAT	
<u>1.6</u>	If only submitting a change to products or suppliers, identify the nature of the change and submit supporting documentation	

 $<sup>^4\</sup> For\ information\ about\ the\ criteria\ revision, please\ visit\ the\ website\ http://ec.europa.eu/environment/ecolabel/products-groups-and-criteria.html$