About Nordic Ecolabelled

Panels and mouldings for interior use

Version 6.12

Background to Ecolabelling
22 August 2023

Nordic Ecolabelling

Content

010 Panels and mouldings for interior use, version 6.12, 22 August 2023

This document is a translation of an original in Danish. In case of dispute, the original document should be taken as authoritative.

Addresses

In 1989, the Nordic Council of Ministers decided to introduce a voluntary official ecolabel, the Nordic Ecolabel. These organisations/companies operate the Nordic ecolabelling system on behalf of their own country's government. For more information, see the websites:

Denmark
Ecolabelling Denmark
Danish Standards Foundation
Göteborg Plads 1, DK-2150 Nordhavn
Fischersgade 56, DK-9670 Løgstør
Tel: +45 72 300 450
info@ecolabel.dk
www.svanemaerket.dk

Finland
Ecolabelling Finland
Annankatu 25, 6. flr
FI-00100 Helsinki
Tel +358 9 61 22 50 00
joutsen@ecolabel.fi
www.ecolabel.fi

Iceland
Ecolabelling Iceland
Umhverfisstofnun
Suðurlandsbraut 24
IS-108 Reykjavik
Tel: +354 591 20 00
svanurinn@ust.is
www.svanurinn.is

Norway
Ecolabelling Norway
Henrik Ibsens gate 20
NO-0255 Oslo
Tel: +47 24 14 46 00
info@svanemerket.no
www.svanemerket.no

Sweden
Ecolabelling Sweden
Box 38114
SE-100 64 Stockholm
Tel: +46 8 55 55 24 00
info@ecolabel.se
www.ecolabel.se

1 Summary

Nordic Ecolabelling has drawn up Version 6 of the criteria for Nordic Swan Ecolabelling of construction- and facade panels. The product group has been expanded since the previous version to include new materials and function types. Accordingly, function type "facade panels" in the material types described below are now included in the product group. The material types have also been expanded to include various cement-based panels and high pressure laminate panels (HPL). See the new product group definition in Section 2.1.1.

On 22 August 2023, Nordic Ecolabelling decided to split the criteria in two separate criteria for panels for indoor and outdoor use respectively. The name of these criteria has been changes to 010 panels and mouldings for interior use. Panels and cladding for exterior use is now covered by new product group 114.

This product group contains a wide variation of material types, production processes and functions among the different panels. The product group thus comprises many different functional units and it has therefore been decided to make the following general division into functional units within the product group: wood-based panels (incl. laminated wood panels), HPL panels, plasterboards, mineral wool panels and cement-based panels. The criteria thus seek to identify the most environmentally favourable panels within each panel type rather than directly comparing panel types with each other.

In order to gain an overview of the key environmental impacts in the products' life cycle, an environmental assessment of the product group and a for example a qualitative MECO analysis (Materials, Energy, Chemicals and Other) for each panel type has been performed. On the basis of the MECO analyses, an RPS (Relevance, Potential and Steerability) analysis is made for each panel type in which high environmental relevance (high R) has been identified in the MECO analysis. The RPS analysis is a tool for prioritising environmental labelling requirements and assessing where to focus the requirements in order to achieve the maximum environmental benefit. Section 2.2 shows the main results of the RPS analyses.

In addition, it has been considered whether to expand the product group to include panels in plastics-based composite and sandwich panels of metal sheeting with a core material. The RPS analyses have shown that at the present time there is an insufficiently broad basis in the data for identifying the environmentally best plastics-based composite panels. The analysis also revealed a limited data basis for metal sheeting with a core, and that these panels are generally marketed with the main function of thermal insulation. Panels with the main function of thermal insulation are not included in this product group, and consequently this panel type has not been included.

Environmental advances of the Product group

Nordic Swan Ecolabelled panels and mouldings for interior use have a reduced environmental and climate impact throughout their lifecycle – and strict requirements for recycled materials, chemicals and quality promote circular economy.

Nordic Swan Ecolabelled panels and mouldings for interior use:

- Are made of a high proportion of renewable and/or recycled materials*.

- Wood-based panels consist of timber that is legally harvested and certified under a traceability system. Furthermore, at least 70% of the timber is sourced from certified forestry.
- Meet strict requirements for chemicals used in production and for surface treatment. This means, for example, that antibacterial substances and halogenated flame retardants cannot be added.
- Meet strict requirements for emissions of formaldehyde and organic solvents. This is positive for the indoor environment.
- Have reduced climate impact which is achieved by meeting strict requirements for energy consumption.
- Are of good quality and properties are documented. This means that the panels and mouldings comply with harmonised standards in accordance with the Construction Products Regulation (EU/305/2011) or voluntary CE marking according to ETA.

** Except from cement-based panels which only consist of minimum 30% recycled materials.*

Changes in the revised version

Based on the evaluation and the MECO and RPS analyses, the main changes in the revised version concentrate on expanding the criteria with new requirements for cement-based panels and high pressure laminates (HPL), on setting a pure energy requirement for panel production, mandatory requirements for renewable or recycled material and on introducing quality requirements. Table 25 in Chapter 5 gives a list of all changes in the requirements. More detailed descriptions of requirement changes and new requirements are given in Chap. 4.

2 Basic facts about the criteria

2.1 Products that may be ecolabelled

The product group has been expanded since the previous version to include new materials. The material types have also been expanded to include various cement-based panels and high pressure laminate panels (HPL).

2.1.1 Product group definition

The product group includes panels in which the main function is one or more of the following: interior cladding of walls and ceilings, construction panels, sound absorbent panels, panels for subfloors, panels for subroofs and panels for production of furniture, internal fittings, etc.

Mouldings for indoor use, such as skirtings/baseboard, can also be Nordic Swan Ecolabelled. The mouldings shall consist of the same materials as specified below for panels and meet the points under "The product group does not include the following product types".

The following material types are included in the product group:

- Wood-based panels with or without laminated surface
- Solid wood (untreated or surface-treated) which is assembled into an interior panel, e.g. by the consumer
- Panels based on renewable raw materials other than wood
- High pressure laminate panels (HPL and compact laminate according to EN 438 serie)
- Plasterboards
- Mineral wool panels (where the main function is **not** thermal insulation)
- Cement-based panels for example fibre cement, cement and magnesium oxide panels
- Cross Laminated Timber (CLT) according to EN 16351

The product group does not cover the following product types:

- Panels/mouldings with total more than 15% by weight of materials other than the above are not included in the product group
- Panels or cladding in which the main function is to insulate against heat or cold loss. Panels which are marketed as insulation panels or insulation products are thus not included
- Wet room panels
- Roofing panels (outer roof)
- Whole prefabricated wall elements are not included in the product group
- Floor coverings, as these can be ecolabelled under the Nordic Swan Ecolabelling criteria for floors

Nordic Ecolabelling reserves the right to determine whether a product can be ecolabelled according to the Nordic Swan Ecolabelling criteria, and to determine the criteria to be used for any product application. For further information please contact the Nordic Ecolabelling organisation (see addresses in the beginning of the document).

Fibre-based panels/mouldings with more than 15% cement will be included in the functional unit "Cement-based panels/mouldings". Panels/mouldings based on renewable raw materials other than wood must fulfil the energy requirement for wood-based panels.

2.1.2 Functional units

This product group contains a wide variation of material types, production processes and functions among the different panels. Some panel types cover just one or only a few functions, while other panel types such as cement-based panels are used both indoors and outdoors. Hence, a plasterboard for indoor use cannot be compared with an outdoor cement panel. A single functional unit for a $1m^2$ construction panel would thus be impractical. The product group contains many different functions, and several of the material types figure in more than one of these. It has therefore been decided to make the following general categorisation of functional units in the product group: wood-based panels (incl. laminated wood panels), HPL panels, plasterboards, mineral wool panels and cement-based panels. The unit for each is 1 kg of the material type.

This approach are seen especially in relation to the energy requirement. The use of several functional units allows better controllability of the requirements. The criteria thus seek to identify the most environmentally favourable panels within each panel type, rather than directly comparing the panel types with each other.

Depending on the material used in the panel, different requirements will be relevant for securing a reduced environmental impact in the finished panel. The material requirements in the criteria are thus brought into play in relation to the material composition of the panel.

2.1.3 Description of panel types

Wood-based panels

Types of wood based panel materials[1]:

- Plywood
- Solid Wood Panel (SWP): Panel composed of boards glued together and oriented in layers, e.g. as a 3-ply plywood
- Oriented Strand Board (OSB): Panel composed of long flakes glued together and oriented in layers, e.g. as a 3-ply plywood
- Chipboard/Particleboard
- Fibreboard: Traditional hard, semi-hard and soft (wet-process) panels
- Medium Density Fibreboard (MDF): Fibreboard made with a dry process
- Cement-bound chipboard
- Laminated Veneer Lumber (LVL): Panel consisting of layers of thin wood glued in parallel (unlike plywood)
- Cross Laminated Timber

The many types of wood-based panels result in variations in panel production. However, the most important raw materials are wood fibre, either as waste fibre or purchased as round timber and glue. Figure 1 shows a flow diagram for production of chipboard. From this it would seem that only chipboard uses wood waste, while the other wood panel production processes use round timber. However, there are examples of panel types other than chipboard using wood waste in their production.

[1] http://vot.teknologisk.dk/4021,2

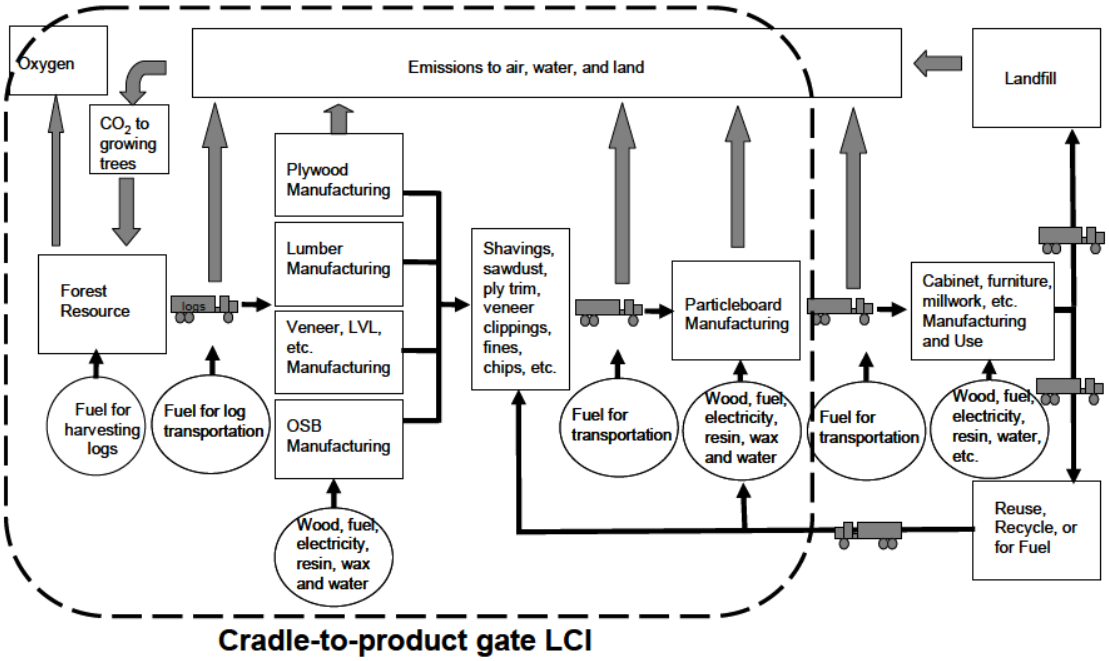


Fig. 1 Cradle to gate flow diagram for production of chipboard[2]

Between 70 and 95% of the panel consists of renewable raw materials in the form of wood fibre, either purchased as solid wood, waste wood or recycled wood fibre. The remainder is mainly adhesive and any surface treatment in the form of paint or laminate. Melamine-urea-formaldehyde and urea formaldehyde are mainly used for hardwood plywood and as low-emission formaldehyde adhesive for chipboard and fibreboards such as MDF panels.

Phenol-resorcinol- formaldehyde is the primary adhesive type for laminated panels which are designed to cope with severe operating conditions. Phenol-formaldehyde is particularly used for softwood plywood for outdoor use, fibreboard and low-emission chipboard[3].

Laminated wood-based panels

Lamination film may be paper or plastic and impregnated with melamine plastic. It is also called "decor paper". The film may be used for laminating the surface of wooden panels for use as cupboard doors, shelves, cupboard sides, surrounds, skirting boards, battens, moulded battens, etc. The film may be coloured or stamped like wood and it may be difficult to distinguish it from the real thing. PVC films were formerly very widespread due to their good properties, but in recent years have in many places been substituted with other plastics types[4].

During lamination of wood panels, a layer of melamine resin-impregnated decor paper or film (see description of decor paper in section on HPL panels below) is melted onto the wood panel by means of pressure and heat.

The resin-impregnated decor paper is self-adhesive, so no adhesive is added to the panel. In the case of production plants which manufacture both the decor paper and the wood

[2] Adhesive systems for laminated wood and chipboard, Sintef 2012
[3] General Technical report FPL
[4] Working Report from Danish Environment Protection Agency No. 11 2008

panel, the lamination process is often adjacent to the panel production plant, with reuse of the heat from the different processes[5].

HPL panels

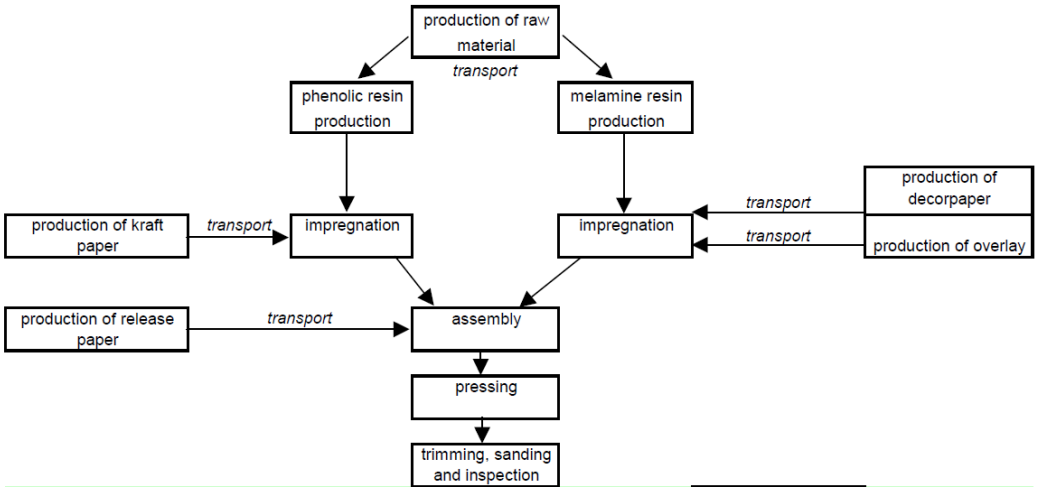


Fig. 2 Flow diagram for HPL panel production[6]

HPL panels consist of craft paper and decor paper, which are impregnated with phenolic and melamine resin. The surface and decor paper are impregnated with melamine resin. This gives the HPL panel its hard surface. The HPL core consists of craft paper impregnated with phenolic resin. The phenolic resin gives the panel a certain flexibility.

There is rarely a large material variation in HPL panels, and typical material composition will be as follows[7]:

- 55-62% unbleached craft paper
- 2-12% white decor paper
- 20-32% phenolic resin
- 2-12% melamine resin

The paper is impregnated by dipping in resin baths until it is saturated. A roller then presses the surplus resin from the paper which is then dried in a hot-air tunnel about 30 metres long. This is done with a flow of hot air between 120-165°C. The airflow is then cleaned by afterburning. The dried impregnated paper has low humidity and is rolled and stored in air-conditioned rooms for later production.

During the hardening, drying and pressing process, the methanol, formaldehyde and phenol evaporate from the laminate. These substances are harmful to the environment and to health, but can be cleaned from the exhaust air with a special incineration technique.

[5] BAT Reference Document for the Production of Wood–based Panels, EU Commission Draft 2013
[6] International Committee of Decorative Laminates Industry, ICDLI, "Environmental Declaration for High Pressure Laminate HPL and its elements" (1999)
[7] EPD from ICDLI - the International Committee of the Decorative Laminates Industry, 2012

Additives to the laminate include stabilisers, softeners, pigments and flame inhibitors. The finished product is not thought to emit any significant substances to the indoor climate[8].

Depending on the desired thickness of the HPL panel, several cores of paper can be combined. The transparent, impregnated decor paper is placed on top. The core and decor paper are placed in a press where the laminate panel is formed by a pressure of 25 to 50 bar and a high temperature of 150 to 170°C [9].

Plasterboards

Plasterboards consist of about 90-95% gypsum plaster, paper/cardboard material of about 5% and additives. A fibreglass mat may be embedded in the surface. This is covered with an acrylic water-based coating. The paper is often recycled cardboard or paper. The gypsum may be from three different sources:

- Recycled gypsum plaster is collected from building sites, recycling stations and demolition sites.
- Industrial residual gypsum from smoke cleaning at power stations.
- Natural gypsum from quarries.

The production process for plasterboards consists of crushing/homogenisation of the gypsum material which is then heated until it forms a casting plaster. The plasterboards are cast in lines in which the casting plaster is held in place with paper or cardboard. Water is mixed in, and the gypsum hardens[10].

The physical and chemical properties of gypsum make it particularly suitable as a building material with fire inhibiting effect, as high temperatures cause it to release the structural water. Only when this has happened do the panels start to conduct heat.

Plasterboards are available in different thicknesses and there are also variations in density. New types have been developed with a less compact gypsum core, resulting in lighter panels and thus better working conditions for persons installing the panels.

Mineral wool panels

Mineral wool panels are used both as acoustic panels and also, at the same time, for thermal insulation. This product group does not include panels whose main aim is thermal insulation, so the mineral wool panels in this product group will mainly be acoustic panels.

Mineral wool is usually either fibreglass or stone wool. Here is a list of the commonest materials in mineral wool production[11]:

Fibreglass: Quartz sand, process glass waste, external glass waste, other process waste, nepheline syenite, sodium, potassium carbonate, limestone, dolomite, sodium sulphate, borax, colemanite and ulexite.

Stone wool: Basalt, limestone, dolomite, blast furnace slag, silica sand, sodium sulphate and process waste.

[8] http://www.trae.dk/index.asp?page=/Dokumenter/Dokument.asp%3FDokumentID%3D26
[9] HPLWORLD The Duropal Magazine_ No. 01_ 2007–2008
[10] Life cycle assessment and social economic assessments of different alternatives for handling and treating gypsum waste, MST 2012
[11] BAT Reference Document for the Production of Glass, EU Commission 2012

Binder raw materials: Phenol formaldehyde resin (in solution), phenol, formaldehyde and resin catalyst (if the resin is produced on site), ammonia, urea, mineral oil, silicone, silane and water. The binder can also be a bio-based binder. However, this is a relatively new development.

Example of materials structure of finished mineral wool panel:

- Possible coating on rear of panel.
- Mineral fibre core – which may consist of the following: mineral wool, perlite, recycled paper, clay and maize starch.
- Possible scrim – a non-woven surface fixed (perhaps with adhesive) to the mineral wool core.
- Surface coating – durable, possibly light-reflectant surface coating.

In addition, a steel suspension system is often used (especially for ceiling panels).

Production can generally be described with the following production processes:

- Production of raw materials
- Melting in furnace
- Formation of fibres
- Curing of product
- Cooling of product
- Post-treatment

Table 1 Example of a fibreglass panel

Mineral fibre core	Function	Percentage quantity
Fibre	Acoustic	40-50%
Perlite	Filler	20-30%
Starch	Binder	1-10%
Recycled panels	Filler	5-10%
Recycled paper	Filler	1-10%
Coating	Finish	10-20%
Scrim*	Finish	1-5%
Adhesive	Finish	0.05-1.5%

** Scrim – is a non-woven material fixed to the mineral fibre core with latex adhesive*

Cement-based panels

Cement-based panels may be multi panels, indoor construction panels, fireproof panels, windproof panels, acoustic panels and facade panels.

Cement-based panels often consist of the following materials: cement (lime or magnesium oxide based), cellulose (wood fibre), inorganic filler (sand/lime) and any pigments and additives. Part of the cement may be replaced by fly ash or other inorganic materials to reduce overall energy impact. There is a wide variation in material composition between the different cement-based panels on the market.

For compliance with product standard EN 12467 for fibre cement panels, the panel must consist mainly of cement or a mixture of calcium and silicate reinforced with fibre.

The cement must comply with the definition in EN 197-1 or other technical specification in the country where it is used. EN 197-1 contains five classes of cement mixtures, in which Portland cement is the basic cement constituent. In class 3 - Blast furnace cement - and class 5 - Composite cement - the Portland cement constituent may be of lesser significance.

The cellulose component can vary widely and in high-density panels the proportion may be down to 5-10% of constituent raw materials. However, part of the cellulose is dissolved in the water, which is expressed from the panel at the end, and thus disappears from the panel. As a result, its presence in the finished panel is about 1%. One of the functions of the cellulose is to make the panel pliable during the actual production process[12].

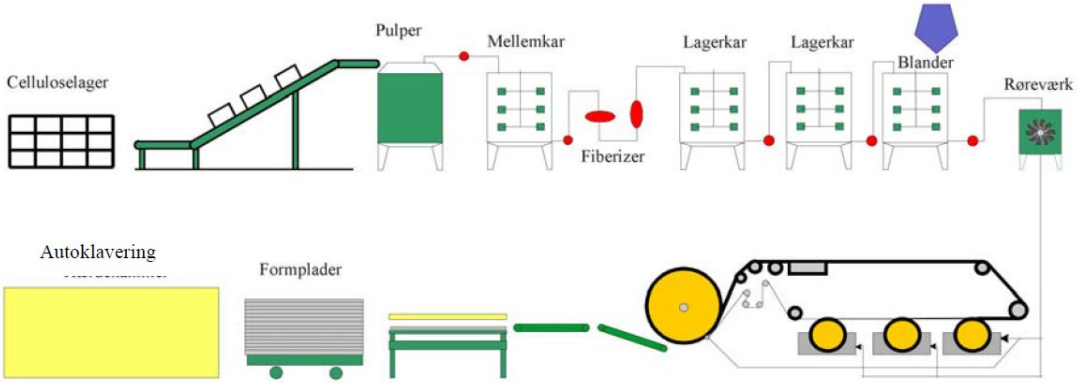


Fig. 3 : Diagram of fibre cement production (here Hatschek and autoclaving)[13]

The two commonest production methods for cement-based panels are Flowcoat and the Hatschek process. In the Hatschek process, many thin layers are formed as a kind of membrane and superposed until the desired panel thickness is achieved. Unlike the Hatschek process, the fibre-cement panel is produced in one layer when using the flowcoat process. This does not necessarily achieve the same strength as the Hatschek process.

The subsequent curing of the panel can be done by air drying for 28 days in the store. This requires considerable storage capacity. An alternative is curing in an autoclave. This curing process achieves a higher degree of shape and dimensional stability. The uncured flat panels are stacked in the production facility with intermediate steel sheets and subjected to a pressure of approx. 50 kp/cm^2.

The panel is supplied either with the surface achieved in the curing process or with subsequent grinding and possible paint finish.

2.2 Environmental impact of construction panels

In order to gain an overview of the key environmental impacts in the products' life cycle, an environmental assessment of the product group and a qualitative MECO analysis for each panel type has been performed.

[12] Telephone interview with Peter Bech from Ivarsson on 10/1 2014
[13] Flat panels: Uses and mounting, Dansk Eternit

MECO stands for the assessment of Materials, Energy, Chemicals and Other characteristics and describes the principal environmental impacts during the product's life cycle phases. The MECO analyses are based on LCA studies, datasets from generic databases, EPD's and scientific reports.

An overall RPS (Relevance, Potential and Controllability) analysis is then made for each panel type in which high environmental relevance (high R) was identified in the MECO analysis. The RPS analysis is a tool for prioritising environmental labelling requirements and assessing where to focus the requirements in order to achieve the maximum environmental benefit. The overall RPS analysis is available in Danish and Swedish and can be obtained on request to Nordic Ecolabelling.

Tables 2 to 6 give the results for the most important areas of the RPS analyses. Areas with an overall high RPS will trigger a requirement in the criteria. Areas with a medium RPS may trigger a requirement or may be subject to a requirement in a future version of the criteria. Areas with an overall low RPS will not trigger a requirement in the criteria. More detailed reasons for the individual requirements are given in Section 4.

2.2.1 RPS analysis of wood-based panels

Table 2 RPS analysis of wood-based panels

Overall priority	Area and level indication (high - medium - low) for R, P and S	Comments
High	**Resources - wood raw materials** High R, high P, high S	High RPS for requirement for sustainable or recycled wood raw materials.
	Energy - material and panel production High R, medium to high P, medium to high S	High RPS has been identified for the energy impact of panel production and drying of wood raw materials. The actual adhesive production also contributes a significant part of the energy impact. Here it is the production of the raw materials which requires energy and not the mixing of the adhesive. The controllability is therefore only medium, as there are several links further back in the product chain and the potential has been unclear.
	Chemicals - generally High R, medium P, high S	The chemicals requirements apply to all chemical products used in panel production. Here it is assessed that formaldehyde, VOC and isothiazolinones in the binders have the highest relevance. Also securing a low content of problematic chemicals in the surface treatment, e.g. VOC, flame inhibitors, heavy metals in pigments. Also a high RPS for requirements limiting the use of nano particles, for instance in the surface treatments.
	Chemicals - formaldehyde High R, high P, high S	Here there is high RPS for requirements for formaldehyde both in the form of reduced formaldehyde emissions in the use phase and reduced free formaldehyde in the chemical products used, e.g. adhesives.
	Quality and properties High R, high P, medium S	Here there is RPS for securing conformity between the properties and the functions for which the panels are marketed and the performance declarations drawn up in relation to the CE marking. There is also RPS for ensuring that panels not covered by harmonised product standards also have documentation for the properties and functions for which the panel is marketed.
Medium	**Resources - bio-based adhesives** High R, low P, low S	There is a low to medium RPS for requirements for bio-based adhesives. Work is ongoing to develop bio-based adhesives. These are not particularly widespread yet, and the potential and controllability are therefore judged low at the present time. This will be a possible future requirement.

Low	**Resources - waste phase** High R, medium to low P, low S	Wood-based panels have a generally high calorific value (17-20 MJ/kg) and are suitable for incineration with energy recovery. For some types of wood-based panels, material reuse will be relevant.

2.2.2 RPS analysis of HPL panels

Table 3 RPS analysis of HPL panels

Overall priority	Area and level indication (high - medium - low) for R, P and S	Comments
High	**Resources - wood raw materials** High R, high P, high S	High RPS for requirement for sustainable or recycled wood raw materials in the paper.
	Energy - materials production (wood raw materials) High R, medium to high P, medium S	In Nordic Ecolabelling's experience, there is RPS for energy for paper, and therefore specific energy requirements can be set for the paper used.
	Energy - panel production High R, medium to high P, high S	Here, high relevance has been identified for energy impact from panel production. HPL panel production is a very energy-intensive production type. At the same time high potential has been identified for reducing energy consumption in production.
	Chemicals - pigments, VOC, biocides and other High R, medium P, high S	The chemicals requirements are applied to all chemical products used in panel production. Here it is assessed that formaldehyde, VOC and isothiazolinones in the binders have high relevance. Also securing a low content of problematic chemicals in the surface treatment, e.g. VOC, flame inhibitors, heavy metals in pigments. Also a high RPS for requirements limiting the use of nano particles, for instance in the surface treatments.
	Quality and properties High R, high P, medium S	Here there is RPS for securing conformity between the properties and the functions for which the panels are marketed and the performance declarations drawn up in relation to the CE marking. There is also RPS for ensuring that panels not covered by harmonised product standards also have documentation for the properties and functions for which the panel is marketed.
Medium	**Energy - materials production (resin)** High R, low to medium P, medium to low S	High relevance has been identified in relation to energy impact from material production, including raw materials extraction. All constituent materials are highly processed, with correspondingly high energy consumption. The potential for energy reduction in the production of phenolic and melamine resin is unclear. The different HPL production systems use much the same material types without wide variations in material proportions.
	Chemicals - resins High R, low to medium P, medium to low S	No potential or controllability has been identified for substituting the phenolic and melamine resins used, as these are essential for the panel type. However, requirements can be set to ensure low emission values during production.
Low	**Resources - waste phase** High R, medium to low P, low S	HPL panels have a generally high calorific value (17-20 MJ/kg) and are suitable for incineration with energy recovery. Materials reuse is not considered very relevant for HPL, as the materials are strongly combined in the lamination process and are hard to reuse. The lamination process is essential for the panel type, so no great potential for further resource requirements is envisaged, other than requirements for energy and sustainable or recycled wood raw materials.

2.2.3 RPS analysis for plasterboards

Table 4 RPS analysis for plasterboards

Overall priority	Area and level indication (high - medium - low) for R, P and S	Comments
High	**Emissions - dust emissions** High R, medium P, medium to high S	There is high RPS for requirements for dust emissions from the production of mineral raw materials.
	Energy - panel production Medium to high R, medium to high P, high S	Here, medium to high RPS has been identified in relation to energy impact from panel production. There is a potential for recycling heat from production processes.
	Chemicals - VOC, biocides and other High R, medium P, high S	The chemicals requirements are applied to all chemical products used in panel production. Here there is judged to be high relevance for substances such as the additives and coatings used in the plasterboard. E.g. formaldehyde, VOC and isothiazolinones in binders.
	Quality and properties High R, high P, medium S	Here there is RPS for securing conformity between the properties and the functions for which the panels are marketed and the performance declarations drawn up in relation to the CE marking. There is also RPS for ensuring that panels not covered by harmonised product standards also have documentation for the properties and functions for which the panel is marketed.
Medium	**Resources - water** Medium R, medium P, medium to high S	There is medium RPS for setting requirements for a recycling system for water in panel production. Water is used in plasterboard production both as a binder and as a mixer.
	Resources - gypsum raw materials - feedstock High R, medium P, low to medium S	Here there is medium RPS for setting requirements for a minimum proportion of recycled gypsum in panel production. This will ensure that the production system can handle recycled gypsum and ensure that recycled gypsum is not used for other purposes with less environmental benefit, e.g. composting.
	Resources - wood raw materials Low to medium R, high P, high S	For paper where more than 15% by weight is used. High RPS for requirement for sustainable or recycled wood raw materials in the paper. This requirement will rarely be activated on plasterboards, as there is generally max. 5% by weight paper in the panel.
	Resources - gypsum raw materials - waste phase High R, medium to low P, low S	Here there is judged to be medium RPS for encouraging reuse of the plasterboard material after final use and for providing information to customer that plasterboard waste can be reused, as can any dismantled old plasterboard.
Low	**Resources - gypsum extraction** Medium R, low to medium P, low S	Here there is relevance in relation to securing sustainable operation of gypsum quarries. For instance, with regard to noise, dust and land use. However, this is rated to have very low controllability and medium potential. Hence, no requirements have been laid down.

2.2.4 RPS analysis of mineral wool panels

Table 5 RPS analysis of mineral wool panels

Overall priority	Area and level indication (high - medium - low) for R, P and S	Comments
High	**Resources - mineral raw materials** High R, high P, high S	High RPS for requirement for recycled mineral raw materials in the panel.
	Resources - wood raw materials High R, high P, high S	High RPS for requirement for sustainable or recycled wood raw materials in the paper.

	Energy - materials production (wood raw materials) High R, medium to high P, medium S	In Nordic Ecolabelling's experience, there is RPS for energy for paper, and therefore specific energy requirements can be set for the paper used. RPS for requirements where more than 15% by weight is used.
	Energy - panel production High R, medium to high P, high S	High RPS has been identified for the energy impact of panel production and the actual mineral wool production.
	Emissions - dust emissions High R, medium P, medium to high S	There is high RPS for requirements for dust emissions from the production of mineral raw materials.
	Chemicals - pigments, VOC, biocides and other High R, medium P, high S	The chemicals requirements are applied to all chemical products used in panel production. Here it is assessed that formaldehyde, VOC and isothiazolinones in the binders have the highest relevance. Also securing a low content of problematic chemicals in the surface treatment, e.g. VOC, flame inhibitors, heavy metals in pigments.
	Resources - mineral raw materials High R, medium P, medium S	There is medium to high RPS for requirements for radioactive substances and heavy metals in virgin mineral raw materials for acoustic panels. Controllability is slightly lower for recycled mineral raw materials and waste raw materials such as slag and fly ash, but the relevance is still high and there is an overall medium to high RPS.
	Quality and properties High R, high P, medium S	Here there is RPS for securing conformity between the properties and the functions for which the panels are marketed and the performance declarations drawn up in relation to the CE marking. There is also RPS for ensuring that panels not covered by harmonised product standards also have documentation for the properties and functions for which the panel is marketed.
Medium	**Resources - binders** Medium R, medium P, medium to low S	There is medium RPS for replacing fossil fuel binders with bio based binders in the panel. Potential and controllability are currently unclear. There must be a focus on this for a requirement in the future.
	Energy - materials production (resin) Medium R, low to medium P, medium to low S	There is a total low to medium RPS for energy requirements for binders. Here no requirements are set in this version of the criteria.
Low	**Resources - waste phase** High R, medium to low P, low S	Materials reuse is found to be of high relevance and takes place with some panels. The controllability of encouraging this further with a requirement is low. Instead, the controllability lies in ensuring that no problematic substances are included by means of the chemical requirements.

2.2.5 RPS analysis of cement-based panels

Table 6 RPS analysis of cement-based panels

Overall priority	Area and level indication (high - medium - low) for R, P and S	Comments
High	**Resources - mineral raw materials** High R, high P, high S	High RPS for requirements for a high proportion of recycled mineral raw materials in the panel.
	Resources - renewable raw materials High R, high P, high S	High RPS for requirements for a certain proportion of renewable or recycled raw materials in the panel.
	Resources - wood raw materials High R, high P, high S	Here a high RPS has been identified for ensuring that the wood fibres are either certified, sustainable or recycled.
	Energy - materials composition High R, medium to high P, medium S	High RPS has been identified for energy requirements affecting both material production and panel production. The highest RPS for material production is found to exist in relation to the actual material composition, as here a high potential can be identified for reducing the use of the most energy and CO_2 intensive materials.

	Energy - panel production High R, medium to high P, high S	Here, high RPS has been identified for energy impact from panel production.
	Chemicals - dust emissions High R, medium P, medium to high S	There is high RPS for requirements for dust emissions from the production of mineral raw materials.
	Chemicals - pigments, VOC, biocides and other High R, medium P, high S	The chemicals requirements are applied to all chemical products used in panel production. Here it is assessed that formaldehyde, VOC and isothiazolinones in the binders have the highest relevance. Also securing a low content of problematic chemicals in the surface treatment, e.g. VOC, flame inhibitors, heavy metals in pigments. Also a high RPS for requirements limiting the use of nano particles, for instance in the surface treatments.
	Resources - mineral raw materials High R, medium P, medium S	There is medium to high RPS for requirements for radioactive substances and heavy metals in virgin mineral raw materials for acoustic panels. Controllability is slightly lower for recycled mineral raw materials and waste raw materials such as slag and fly ash, but the relevance is still high and there is an overall medium to high RPS.
	Quality and properties High R, high P, medium S	Here there is RPS for securing conformity between the properties and the functions for which the panels are marketed and the performance declarations drawn up in relation to the CE marking. There is also RPS for ensuring that panels not covered by harmonised product standards also have documentation for the properties and functions for which the panel is marketed.
Medium		
Low	**Energy - materials production** High R, high P, low S	Low to medium RPS has been identified for a requirement for production-specific energy consumption for all constituent materials.
	Resources - waste phase High R, medium to low P, low S	Materials reuse is found to be most relevant and takes place with some panels. However, this is mainly as down cycling to road fill. The controllability of encouraging this further with a requirement is low. Instead, the controllability lies in ensuring that no problematic substances are included by means of the chemical requirements.

2.2.6 Most important environmental properties of the product group

Nordic bullet points

Nordic Swan Ecolabelled panels and mouldings for interior use have a reduced environmental and climate impact throughout their lifecycle – and strict requirements for recycled materials, chemicals and quality promote circular economy.

Nordic Swan Ecolabelled panels and mouldings for interior use:

- Are made of a high proportion of renewable and/or recycled materials*.
- Wood-based panels consist of timber that is legally harvested and certified under a traceability system. Furthermore, at least 70% of the timber is sourced from certified forestry.
- Meet strict requirements for chemicals used in production and for surface treatment. This means, for example, that antibacterial substances and halogenated flame retardants cannot be added.
- Meet strict requirements for emissions of formaldehyde and organic solvents. This is positive for the indoor environment.

- Have reduced climate impact which is achieved by meeting strict requirements for energy consumption.
- Are of good quality and properties are documented. This means that the panels and mouldings comply with harmonised standards in accordance with the Construction Products Regulation (EU/305/2011) or voluntary CE marking according to ETA.

** Except from cement-based panels which only consist of minimum 30% recycled materials.*

2.3 The version and validity of the criteria

The criteria for Nordic Swan Ecolabelling of construction panels were first agreed by the Nordic Ecolabelling Board in October 1992. The present version is called Version 5 and was agreed by the Nordic Ecolabelling Board on 17 March 2011. Version 5 expires on 31 March 2016.

The criteria for Nordic Swan Ecolabelling of construction and facade panels were agreed by the Nordic Ecolabelling Board on 25 February 2015. Version 6 expires on 31 March

On 8 January 2016 the Nordic Ecolabelling's Criteria Group approved to insert an exception for bronopol up to 0.05% by weight in requirement O21. New version is 6.1.

On 30 March 2016 the Nordic Ecolabelling's Criteria Group approved an adjustment in requirement O34. New version is 6.2.

On 21 June 2016 the Nordic Ecolabelling's Criteria Group approved an alternative version of the requirements O6 and O7 included as Annex 10. The new version is called 6.3.

On 16 August 2018 the Nordic Ecolabelling's Criteria Group approved an adjustment in requirement O33 regarding TVOC and formaldehyde. The new version is called 6.4.

On the 9 October 2017 Nordic Ecolabelling's Criteria Group decided to remove O42 Take-back system and on the 19 December 2018 Nordic Ecolabelling decided to prolong the criteria with 24 months to the 31 March 2022. The new version is called 6.5.

On the 31 March 2020 Nordic Ecolabelling decided to prolong the criteria to the 30 June 2023. The new version is called 6.6.

On 2 June 2020, the Nordic Ecolabelling Board decided to make a change in requirement O10 for prohibited tree species. On 12 January 2021 Nordic Ecolabelling decided on an adjustment in O24 and O25 giving exemption for UV-curing acrylates in O24 and O25. On 4 May 2021 Nordic Ecolabelling decided on an adjustment in O24 giving an exemption for phenol. The new version is called 6.7.

On 31 August 2021, Nordic Ecolabelling decided to include untreated solid wood and mouldings in similar materials that are included in the product group for indoor use. The new version is called 6.8.

On 5 April 2022 Nordic Ecolabelling decided to prolong the criteria with 12 months to the 30 June 2024. The new version is called 6.9.

On 28 June 2022 Nordic Ecolabelling decided on an adjustment in O19 giving exemption from the prohibition of classification with H351 and H361 for resions with melamine. The new version is called 6.10.

On 14 February 2023 Nordic Ecolabelling decided to make an adjustment of requirement O21 prohibited substances regarding exemption for melamine (CAS nr. 108-78-1) and a prolongation of the criteria with 6 months to the 31 December 2024. The new version is called 6.11.

On 22 August 2023, Nordic Ecolabelling decided to split the criteria in two separate criteria for panels for indoor and outdoor use respectively. The name of these criteria has been changes to 010 panels and mouldings for interior use. Panels and mouldings for exterior use is now covered by new product group 114. The new version is called 6.12.

2.4 The Nordic market

2.4.1 Market deskriptions

The product group for panels and mouldings for interior use is well represented in production in the Nordic Region and the rest of Europe. There are often very large production volumes and the potential for substantial environmental benefits from environmental labelling.

The following gives a list of some of the biggest panel manufacturers in the Nordic Region, which are covered by the new product group definition. This is followed by a short description of the construction panel sectors in each Nordic country.

Table 7 Plasterboard manufacturers mainly in the Nordic Region and EU

Plasterboard manufacturer	Production location	Turnover in[14] million kroner in 2012
Gyproc	Sweden and Denmark	407 (Sweden)
Norgips	Norway	15 (Sweden)
Knauf Danogips	Sweden and Germany	0.5-1 (Sweden)
Rollform AS	Norway	40 (Norway)
Lafarge Gypsum	International	-

Table 8 Nordic wood panel manufacturers

Wood-based panel manufacturer	Production location	Turnover in million kroner in 2012
Swedspan	Sweden	858 (Sweden)
Byggelit	Sweden	183 (Sweden)
Plyfa	Sweden	167 (Sweden)
Moelven Vänerply	Sweden	146 (Sweden)
Novopan	Denmark	350,000 m3 panels/year
Hudevad Formfiner	Denmark	Manufactures to order
MetsäWood	Finland	904 million euro (group)
UPM (veneer)	Finland	390 million euro (group)
Oslo Finérfabrikk AS	Norway	129 (Norway)
Forrestia	Norway	113 (Norway)

[14] Allabolag.se, 2013-04-15 http://www.allabolag.se/start

Hunton Fiber A/S	Norway	299 (Norway)
T-Komponent AS	Norway	-
Arbor-Hattfjeldal As	Norway	-
RBI Interiør AS	Norway	-
Mjøspanel AS	Norway	-
Bosvik AS	Norway	81 (Norway)

Table 9 International wood panel manufacturers

Wood-based panel manufacturer	Turnover [billion dollars]	Registered country	Market
Sonea Indústria – SGPS	2.45	Portugal	Iberian peninsula
Weyerhaeuser Company	2.44	USA	Global, 8 offices in China
Carter Holt Harvey	2.20	Australia	-
Pfleiderer AG	1.92	Germany	-
Kronospan AG	1.44	Switzerland	-
Medite	?	Ireland	-
Grupo Nueva	0.90	South America	Argentina, Brazil, Chile and Mexico
Kaindl	0.58	Germany	-
FINSA	0.26	Spain	-
Chinese Dare Group	0.15	China	China
Fantoni	0.10	Italy	International

Table 10 Nordic manufacturers of mineral, HPL and plastics-based panel

Manufacturer of mineral and plastics-based panels	Production location	Turnover in million kroner in 2012
Saint-Gobain Isover	Sweden and Denmark	928 (Sweden)
Paroc	Sweden	1152 (Sweden)
Rockwool	Denmark and Norway	448 (Sweden)
Knauf	Germany	11 (Sweden)
Thermisol	Sweden	167 (Sweden)
Sundolitt	Sweden	256 (Sweden)
Jackon	Sweden	469 (Sweden)
Protecta AS	Norway (UK)	42 (Norway)
Acusto AS	Norway	148 (Norway)
Norprodukter Sale AS	Norway	32 (Norway)
Moelven Nordia AS	Norway	406 (Norway)
Modulvegger Oslo A/S	Norway	135 (Norway)
Isola as	Norway	570 (Norway)
Glava	Norway	1323 (Norway)
Forestia (Byggma)	Norway	135 (Norway)
Cembrit	Norway	109 (Norway)
Ivarsson (Etex Group)	Belgium (office in Denmark)	-
Honeycore AB	Denmark/Sweden private label	-
Steni AS	Norway	177 (Norway)
Formica (HPL)	Finland	-

Table 11 International manufacturers of High Pressure Laminate

HPL panel manufacturer	Production location
Arpa Industriale S.p.A.	Italy
Formica Group	USA
FunderMax GmbH	Austria
Gentas Genel Metal Sanayi Ticaret S.A. – Turkey	Turkey
Ludwig Leitermann GmbH & Co. KG	Germany
Modekor Europe GmbH	Germany
Polyrey SA	France
Resopal GmbH	Germany
JSC Slotex	Russia
Sonae Industria de Revestimentos	Portugal
Sprela GmbH	Germany
Syriamica Company (Azzouz Corp.)	Syria
Trespa International B.V.	Netherlands

Sweden

The construction materials industry manufactures construction materials, which either directly goes to contractors or to the construction materials trade, which passes on the materials to contractors or private consumers. In recent years, the trend towards consumers refurbishing their own home has led to a rise in sales of construction materials to the private market.

Even though the Swedish Construction Federation demonstrates that their foreign members only make up 1.6% of the number of members, the tendency is for rising international competition in the construction industry, and this relates to the whole building process - from building owners and consultancy services throughout the construction materials industry and building contractors[15].

Sweden produces a large number of construction panels, such as: wood-based panels, plasterboards and insulation and a number of other construction materials such as wood fibre cement elements, see following tables under "Manufacturers and turnover". However, production of wood-based panels has been much greater than it is today and the number of manufacturers has fallen over the years.

In 1980, there were 32 manufacturing companies in Sweden making chipboard. Today there are 5 panel manufacturers, of whom 3 produce chipboard[16].

According to data from the Swedish Construction Materials Association in 2003[17] market share (expressed as turnover) of the relevant construction panels on the Swedish market was as shown in Table 12 below.

[15] TMF (wood and furniture businesses) – Wood-based panels
http://www.tmf.se/statistik_11/statistik_9_1/traskivor_1_2_1
[16] TMF (wood and furniture businesses) – Wood-based panels
http://www.tmf.se/statistik_11/statistik_9_1/traskivor_1_2_1
[17] Byggmaterialindustrierna – en viktig näring för Sverige (2005)
http://www.byggmaterialindustrierna.se/index.php/vart-uppdrag/i-pressen/

Table 12 Market share (expressed as turnover) of the relevant construction panels on the Swedish market in 2003

Material type	Turnover
Wood-based panels	SEK 1800 m
Insulation	SEK 1600 m
Roofing materials	SEK 900 m
Plasterboards	SEK 600 m

Denmark

Panel production is generally characterised by large companies with high capacity. There is a low number of manufacturers in Denmark. This means that there is a very large import share, which primarily goes via construction material suppliers, who also supply to the furniture industry and sale to the public. There is no specific sectoral association for panel manufacturers. The Confederation of Danish Industry (DI) has a subdivision for construction (DI Byg), which covers all construction products, including construction panels. There is also the Danish Construction Association, which is a sectoral and employers' organisation and the Træ- og Møbelindustrien association.

The members of the latter body represent businesses within:

- Furniture
- Saw works
- Building components, including windows, doors and floors
- Kitchens
- Craft industry and shop fitting

Finland

Finland produces different panel types for the construction, furniture and shop fitting industries. UPM is Europe's largest manufacturer of veneer panels, and turnover for veneer production is around EUR 390 m. MetsäWood manufactures veneer products in LVL=laminated veneer lumber with product brands Kerto og Kertopuu for the construction and furniture industries and has a group turnover of EUR 904 m.

Manufacturer Koskisen manufactures chipboard and has turnover of EUR 26 m.

Norway

In 2005, the Norwegian construction industry had an estimated turnover of NOK 71 bn (14% of the total) and a value creation of NOK 19.7 bn (13.1% of the total).

The construction industry is generally regarded as conservative. In terms of the environment, it has by and large complied with Norwegian legislation. This hampers players from doing anything extra. The market players within Norwegian construction panels include manufacturers, importers, wholesalers and distributors (outlets for professionals and building product stores for consumers). According to earlier evaluation, Norway has a large import of construction panels from manufacturers outside the Nordic region. Many of these are approved for inclusion in Nordic Swan Ecolabelled furniture. For example, Nordic Swan Ecolabelled construction panels from Germany and Ireland are used in Nordic Swan Ecolabelled furniture.

The market players consist of all involved parties from manufacturer until the products reach the shop shelves/warehouse and are bought by consumers/professionals. In many building projects, the technical construction solutions have already been decided by architects, construction engineers, etc. at an early stage. Their planning and weighting of environmental questions and knowledge of environmental labels will be decisive for the building products selected by the professional end-user. Widespread breakthrough will therefore depend on the existence of Nordic Ecolabelled alternatives within the different product types which are of interest.

2.4.2 Consumers and purchasers in the Nordic Region

The product group has three main groups of purchasers/end-users:

- Manufacturers of panels with coating, furniture and play equipment, which mainly use MDF, HDF, HPL and chipboard in their furniture production
- Contractors, tradesmen for house building activities (new-build, refurbishment)
- Members of the public for personal projects

The highest volumes go to construction, but furniture and kitchen also purchase large volumes of construction panels, together with the market for ready-painted easily assembled panels ("smartboards").

2.4.3 Nordic Swan Ecolabelling licences

There are 13 licences in the Nordic region within the construction panel product group. The licences mainly relate to wood-based panels, both with and without laminate or other coating. There are also two licences for mineral-based acoustic panels.

The licences are a means of environmental communication within both construction and furniture production. With respect to ecolabelled production, Nordic Swan Ecolabelled construction panels are particularly required to permit Nordic Swan Ecolabelling of furniture.

Denmark

- Novopan Træindustri A/S, licence 5010 0015: Spaandex Green Line Series (wood-fibre panels)

Norway

- Mjøspanel, licence 2010 0016: Mjøspanel Elegant Vegg and Mjøspanel StrukturVegg (MDF panels)
- Pfleiderer Holzwerkstoffe GmbH, licence 2010 0017: StyleBoard MDF CARB2 (MDF panels)
- T-Komponent AS, licence 2010 0018: Talgø Eco wall panels (MDF panels)
- Medite Europe Limited, Licence no. 2010 0020 (MDF panels); Medite Ecologique, Medite Exterior, Medite Fire Retardant, Medite Moisture Resistance, Medite Premier, Medite Trade, Medite Ultralite, Medite Floor.
- RBI Interiør AS, Licence no. 2001 0019 (painted MDF panels); Smartpanel Pure (wall and ceiling panel).
- Arbor Hattfjelldal AS, licence no. 2010 0004 (chipboard); Arbor Vegg.

- Forestia AS Braskereidfoss, licence no. 2010 0001 (chipboard); Forestia Standard Møbel 1250*2500 mm, Standard Bygg Rettkant.

Sweden

- Byggelit Sverige AB, licence 3010 0005: Elit taket membrane-lined subroof panel innertakskiva and Elitväggen, wall panel of membrane-lined chipboard
- Saint-Gobain Ecophon AB, licence 3010 0007: Ecophon acoustic panel (9 types)
- Paroc AB Akustik & Interiör, licence 3010 0009, PARAFON acoustic panel (3 types)
- Formica Skandinavien AB, licence 3010 0011: Axiom Bänkskiva, Worktops and Benkeplate (construction panel)
- Spanolux, licence no. 3010 0021, MDF panels (S-Lux Swan + Umidax Swan)

2.4.4 Other regulations and marking schemes

Directives and Regulations

The EU Construction Product Directive, the aim of which was to ensure free trading of construction products within the EU's Inner Market has now been superseded by the EU's new Construction Product Regulations (CPR)[18].

Both the Directive and the Regulations describe how to implement the harmonisation of technical specifications, tests and test methods and other documentation, so that construction products can satisfy the aims of the six essential requirements:

- mechanical resistance and stability
- safety in the case of fire
- health and the environment
- safety in use
- noise
- energy

The biggest changes in the new Construction Product Regulations will be that future CE marking must capable of documentation by a declaration of performance, and that the Regulations automatically apply in all EU countries.

In addition, the Construction Product Regulations introduce a new seventh essential requirement, that of "sustainability". In reality, this will only become a requirement when the harmonised standards are revised, as and when this is ordered by the EU Commission. It is therefore assumed that it will take several years before the sustainability requirement is included in all the harmonised product standards.

There is a requirement for CE marking of construction products covered by the applicable harmonised European standard. Most types of construction panels are covered by a harmonised product standard such as EN 13986: Wood-based panels for construction use, EN 12467: Flat panels in fibre-reinforced cement, EN 15283: Fibre-

[18] http://byggevareinfo.dk/fra_cpd_til_cpr

reinforced plasterboards and EN 14322: Wood-based panels - melamine coated panels for indoor use.

As time goes by, there are few construction products, which do not need CE marking. The CE mark shows that the construction product has a product declaration with details about its properties, e.g. what it can withstand. It is also the manufacturer's promise that the construction product has been tested to verify that it can meet the requirements, e.g. for health and safety. Within the construction panel product group, there are a number of harmonised product standards, depending on the type of construction panel in question.

It has previously been queried whether the EU's Construction Product Directive and the CE marking of construction products constitute a hindrance to ecolabelling. This question has been clarified between Nordic Ecolabelling and the European Commission, Enterprise and Industry: "There is no contradiction. CE marking covers a performance declaration for regulatory requirements. In other words, if a member state is regulating specific characteristics of construction products, this could be considered as a barrier to trade, and the test methods used for the declaration of performance must be laid down in a harmonized product standard. Member states (MS) are no longer allowed to use their own national test methods and product marks for these characteristics (everything not regulated and therefore not obligatory is still part of the private market and is not covered by CPD/CPR CE marking).

Therefore, eco-labels and other voluntary marks are not covered by CE marking (it would be different if eco-labels were to become obligatory in a MS, but let's not start with the most complicated version)".

Communicating the environmental performance of the panel

Within construction, the term "sustainable building" is encountered more and more frequently. The term covers many different approaches with a focus on environmental, social and economic sustainability. This focus arises particularly in the end product - the construction work - and from here spreads to construction products such as construction panels. Here, more and more of the larger contractors make use of different certification schemes for sustainable construction, such as BREEAM, Nordic Ecolabelling, DGNB, LEED, etc. National Green Buildings Councils have been set up in the Nordic countries, with different portfolios of the above certification schemes (see further description in Appendix 1). Appendix 1 gives an overview of other certification schemes and concepts of relevance to construction panels.

Common to these sustainability certification schemes is that they set environmental requirements for construction products. In some cases, input is required for LCAs for the building work, or else environmental product declarations (EPD), emissions testing, environmental labelling or other environmental information.

There are a huge number of useful solutions, but a lack of uniformity, and the construction product manufacturers often have to gather a great deal of different environmental information.

Not all of these sustainability systems ensure that action is being taken on the content of specific problematic substances in the construction materials employed.

There are also measures at the construction product level. In Sweden, there are several databases for approval of construction products, such as Basta, Sunda Hus and Byggvaru-bedömningen. In Norway there are the schemes "Enova anbefaler" and Eco-produkt, while in Denmark the Environmental Protection Agency is developing a project to test the viability of a substitution database for construction products.

There is also a focus on the impact of construction products on a building's indoor climate, and various indoor climate labels and product emission tests are used. These are primarily certificates for the following schemes: CE-mark E1, CARB PHASE 2, Danish Indoor Climate Label, the Finnish M1 scheme or EMICODE E1 or EC1PLUS.

The wide range of materials and thus wide range of environmental appraisal types makes it hard to compare the environmental performance of the different construction panels.

In Norway, there are several construction panels with environmental product declarations, especially plasterboards[19]. However, the focus is mainly on energy and climate and on LCA results for different environmental impact categories, which are hard to handle unless you are compiling an overall LCA for the building work. The different materials can lead to a difference in the panel's functions and maintenance. Together with the need for different panel functions in a building project, this makes it hard to compare the environmental performance of different panel types.

3 About the revision

3.1 Goals of the revision

Main goal

The overall aim of this revision is to ensure that the Nordic Swan Ecolabelling criteria secure a positive environmental benefit via environmental labelling and also that the criteria are viable and clear for the industry. The revision must respond to the areas highlighted in the evaluation of the criteria. In addition, the revision must expand the product group to include facade panels and the material types high pressure laminate, magnesium oxide, fibre cement and plastics-based composites, providing it is possible to identify the best environmental products on the market with environmental labelling criteria.

The criteria must be ready for agreement at the Nordic Ecolabelling Board meeting in March 2015.

Subordinate goals

The revision has the following subordinate aims; cf. the conclusions of the evaluation:

- Expand the product group to include facade panels and the material types high pressure laminate, magnesium oxide, fibre cement and plastics-based composites, with the consequent need to expand the requirements for new material types and energy requirements for additional types of panel production systems.
- Revision of the existing energy requirement for better controllability. The aim is a pure energy requirement for the product group - not a combination of energy and sustainable raw materials.

[19] http://www.epd-norge.no/

- Update the chemical requirements in accordance with chemtech guidelines. This includes a focus on a possible prohibition of candidate list substances in construction panels.
- Update the chemical requirements in accordance with the expansion of new product types in the product group.
- General updating/tightening up of existing requirements to ensure continued relevance. Focus on simplified criteria for the requirement with the highest RPS.
- Assess whether a new indoor climate requirement should be drawn up regarding emissions of TVOC, selected VOCs and carcinogens, etc., for panels used inside the climate screen. Here, attention should be given to emission requirements being drawn up for criteria for Nordic Swan Ecolabelling of floors.
- Draw up quality requirement for different types of construction panels in the product group, if possible. Despite the many functions in the product group, the assessment is that there is controllability for a quality requirement, as the different construction panels have product standards linked to the CE mark in which different quality parameters have been defined.
- Update the background document in relation to the revision of requirements, in order to clearly define which functional units are in view in the criteria and the conclusions from MECO and RPS found in this evaluation.

About this revision

The revision has been carried out by Product Coordinator Heidi Bugge as Project Manager and Jimmy Yoler, as Project Consultant. In each country, a national contact person has provided national input.

External input is being performed in connection with the consultation hearings, a Nordic sector seminar in September 2014 and regular contact with Nordic and European manufacturers within the product group.

4 Justification of the requirements

The following is a description of the individual requirements in the criteria, in which the reasons for setting the requirement and the specific requirement level are explained. The background for the requirement also states whether the requirement has been changed since the previous version.

4.1 Definition of terms used in the criteria

Material: Materials means the constituent materials such as wood, paper, cardboard, pulp, plastic, mineral raw materials, metal, etc.

Chemical products: Chemical products means liquid products, e.g. for surface treatment, additives, glues and other adhesives.

Ingoing substance: Unless otherwise stated, ingoing substance are defined as all substances in the product, including additives to the raw materials/ingredients (e.g. preservatives or stabiliser), but not impurities from production incl. raw material production.

Contamination limit: Impurities include residues from production incl. raw materials production which are found in adhesive, paint, additives and other chemical products in

concentrations below 100 ppm (0.0100% by weight, 100 mg/kg), but not substances intentionally added to a raw material or product for a purpose, regardless of quantity. However, impurities at the raw material level at concentrations of over 1.0% of the raw material will be regarded as a ingoing substance. Known substances realised from the raw materials are also regarded as ingoing substances.

Renewable raw material: Renewable raw material is here defined as a biological material, which is reproduced in nature. It includes the degradable part of products, waste and residues from agriculture and aquaculture (both vegetable and animal), forestry and similar industries and the biodegradable fraction of industrial waste and municipal waste.

Panel types: the following panel types are used in the criteria:

- Wood based panels with or without laminate coating
- Solid wood (untreated and surface treated) which are joined to an interior panel, for example when installed by the consumer
- Panels based on other renewable raw materials than wood
- High Pressure Laminate panels
- Plasterboard
- Mineral wool panels (where the main function **is not** thermal insulation)
- Cement based panels for example fibre cement- , cement- and magnesium panels.

Cross Laminated Timber (CLT)The main material (material with the greatest percentage by weight) determines which of these panel types, the panel belongs to in terms of the resource and energy requirement.

In addition, the energy requirement for paper shall be documented for all panel types where the paper/cardboard portion represents more than 30% by weight of the finished panel.

Self-produced energy: Refers to energy (electricity and heat) which is not purchased from an external supplier. For example if the panel production has an energy surplus, that is sold as electricity, steam or heat, the quantity sold is deducted from the energy consumption. Internally produced fuel sources and residues are not counted as self-produced energy.

4.2 Product information

O1 Information about the product(s)

The applicant must submit the following information about the product(s):

1. Brand name(s) and trade name(s).
2. Description of product(s) included in the application). A product datasheet or similar for each product must be forwarded.
3. Description of manufacturing process of the product. Subcontractors must be described with company name, production location, contact person and the production processes used.
4. For each product: Attach a list of materials and chemical products used in producing the product and any surface treatment of the product. The list must contain the weight percentage of the constituent materials/chemical products in the panel. Safety datasheets for each chemical product must be included.

✉ Any information requested by the requirement. A product datasheet may be sent as part of the documentation. Information about materials, cf. Table 2 in Appendix 2, must be given. It is possible to use a separate Excel spreadsheet corresponding to Table 2 in Appendix 2 as a materials list.

✉ Table 1 in Appendix 2 should be completed and forwarded by the applicant for each product.

4.3 Environmental requirements

4.3.1 Mineral raw materials

The requirements apply to mineral raw materials and mineral bi-products (e.g. fly ash) which make up more than 10% by weight of the finished panel/moulding.

O2 Heavy metals

Mineral raw materials or mineral bi-products must as a maximum contain the following quantities of heavy metals as indicated in Table 13 in accordance with the used test method.

Table 13 Requirement Level for heavy metal content by either partial opening or total opening of the test sample

Heavy metal	Partial opening of the test sample EN 259 Maximum content mg/kg	Total opening of the test sample EN 13656 Maximum content mg/kg
Arsenic	10	30
Lead	25	25
Cadmium	1	10
Mercury	0,5	0,5
Chrome (total)	300	300

✉ The declaration from the raw materials producer/-refiner, containing measurement results, measurement methods and measurement frequency. For the description of the measurement method, see Appendix 1.

Background for the requirement

The requirement covers both primary mineral raw materials and mineral bi-products such as fly ash from heat and power generation at coal-fired power and district heating stations.

The selected heavy metals have impacts on the environment and on health. It is therefore important to reduce exposure as much as possible, both in relation to human beings and the environment.

Different raw materials may contain higher quantities of heavy metals compared to the background levels, e.g. in soil. These include natural gypsum, gypsum from cleaning of smoke gas (industrial gypsum), fibreglass from collected glass and mineral wool from stone. It is important that the heavy metal content is not so high that it creates problems in the user phase or for reuse of product materials.

The limit values in the requirement have been tightened since the previous version of the criteria. In addition, the value for chrome now covers both chrome III and chrome VI. While the former was 500 mg/kg for only chrome III. The previous limit values were set on the basis of the Nordic authorities' limit values for soil quality. However, Nordic Ecolabelling has seen a potential for reducing these levels even further.

The standard referred to in the requirement, DS 259, and the sample-taking procedure described in Appendix 1, capture the variation in heavy metal content represented by both virgin and recycled mineral raw materials.

This requirement refers to standards where one of them is DS 259 Water quality – Determination of metals in water, soil, sludge and sediments. This analysis can be used to test earth qualities. The method is recommended for the determination of lead, cadmium, mercury and chrome.

Here a digestion is done by a reaction of the sample with nitric acid (HNO_3), 1:1 in autoclaving (i.e., at elevated temperature and under pressure), followed by ICP (Inductively coupled plasma, an analysis method of multi-element determination) or AAS (Atom absortionsspektrofotometri). DS 259 provides a partial digestion of the sample rather than a total digestion because the test examines the content of the longer-term potential mobile substances. Partial digestion (DS 259) may represent a "worst-case" washout[20].

Material manufacturers depending on the application of the test results can perform different test methods. In cases, where a total digestion of the sample is used, metals bound in silicate matrix is also made available and the result could be higher than the test for DS 259 with nitric acid (HNO_3). However, the content in the silicate matrix are not available for either leaching or uptake by plants or people. Here in this requirement is a partial digestion with nitric acid sufficient.

In order not to require unnecessary additional testing an opportunity to demonstrate the requirement of an alternative test is now inserted in the requirement. The requirement can thus alternatively be documented with a test of performing total digestion according to "EN 13656 Characterization of waste - Microwave Assisted digestion with a mixture of hydrofluoric acid (HF), nitric acid (HNO_3) and hydrochloric acid (HCl)." As this test method describes the total content and thus possibly gives higher test results. Then the requirement is now updated with specific values when using EN 13656 (total digestion).

O3 Dust emissions

The production and refining of mineral raw materials must not generate dust emissions to the atmosphere (via a chimney) of more than 7 mg dry dust/m^3 air and 21 mg wet dust/m^3 air.

For a description of the measurement method, see section on dust emissions in Appendix 1.

✉ The declaration from the raw materials producer/refiner, containing measurement results, measurement methods and measurement frequency.

Background for the requirement

Based on dust emission levels in BAT reports and dust emission guidelines for fibreglass manufacture[21] and plaster and cement production[22], the assessment has been made that the requirement could be tightened up. The requirement level has therefore been tightened to maximum 7 mg dry dust/m^3 air and 21 mg wet dust/m^3 air. The previous level was maximum 10 mg dry dust/m^3 air and 25 mg wet dust/m^3 air.

[20] Poulsen et al. Forprojekt til analyse af shredderaffald ifht. Farlighed, Force Technology, Miljøprojekt 2011
[21] Official Journal of the European Union, Commission Implementing Decision of 28 February 2012 , BAT on industrial emissions for the manufacture of glass
[22] JRC Reference Reports, Best Available Techniques (BAT) Reference Document for the Production of Cement, Lime and Magnesium Oxide

The background to the requirement is that dust emissions to the atmosphere in many parts of the mineral raw material production industry are one of the most important local environmental issues. For example, the most important environmental issues in cement production are energy consumption and emissions to the air from the clinker burning process. The most important pollutants emitted to the air are here dust, nitrogen oxides and sulphur dioxide[23].

O4 Radioactive substances

The requirement covers all constituent mineral materials described below (> 10% by weight in the panel/moulding). The requirement applies for panels/mouldings for interior uses such as walls, ceilings, sub-floors, fittings and joists..

For products which contain:

Natural materials such as alum shale or building materials or additives of natural volcanic origin, e.g.:

- granitoids (such as granites, syenite and orthogneiss)
- porphyries
- tufa
- pozzolana
- lava

or

materials containing residues from industries which process naturally occurring radioactive material, e.g.:

- fly ash
- phosphogypsum
- phosphorus slag
- tin slag
- copper slag
- red mud (residue from aluminium production)
- residues from steel production

it must be documented that the gamma index (mγ) or activity index (l1) is less than 1.

The requirement applies to all constituent materials used in panels/mouldings for internal uses such as walls, ceilings, sub-floors, fittings or joists. Radioactive substances in the panel/moulding material are expressed as a gamma/activity index in accordance with the following formula:

$C_K/3000 + C_{Ra}/300 + C_{Th}/200 < 0.5$

In the above formula, C_K, C_{Ra} and C_{Th} are the concentrations of potassium-40, radium-226 and thorium-232, expressed as becquerel per kilogram (Bq/kg) of the material. 1% potassium is equivalent to 310 Bq/kg potassium-40, 1 ppm uranium is equivalent to 12.3 Bq/kg of radium-226 and 1 ppm thorium is equivalent to 4.0 Bq/kg of thorium-232.

✉ Sampling programme, including measurement methods, measurement result and measurement frequency. For the analysis method, see section in Appendix 1.

Background for the requirement

The requirement has been tightened by lowering the limit value for the activity index from the previous 1 to 0.5 now. At the same time, the requirement has been made simpler in the specific requirement for the radium index: CRa/100 < 1.0 has been removed to

[23] Reference document on best available techniques in the cement, lime and magnesium oxide industries, EU Commission 2010.

harmonise with EU Directive 2013/59/Euratom. The EU's new radiation protection directive 2013/59/Euratom came into force on 6 February 2014 and must be transposed into national law by 6 February 2018.

The background for the requirement is that radioactive substances can have harmful health effects both during production and during use of the panel. The requirement covers all constituent mineral materials used in panels for internal uses such as walls, ceilings, sub-floors, fittings or joists. Hence, materials only marketed for outdoor use are not covered.

The Swedish radiation safety authority states that requirements for radiation levels are still necessary. In accordance with the European radiation directive 2013/59/Euratom, reference is made to an activity index of 1 applied to construction materials consisting of defined materials listed in the Directive's Annex XIII.

The Swedish radiation safety authority points out that this has relevance for both virgin/natural raw materials and for recycled raw materials, as is also stated in the Directive.

Here a decision has been made that the requirement should refer to the whole "Advisory list of construction materials in respect of gamma radiation emitted" from Annex XIII of Directive 2013/59/Euratom, as the criteria have now been expanded with new panel types with a wide variation in the basic mineral raw materials used.

4.3.2 Wood raw materials, paper, cardboard and paper pulp

The following requirements cover wood fibres, paper, cardboard, paper pulp, veneer and solid wood, as used in the product where the raw materials individually constitute more than 5% by weight of the finished panel/moulding.

For solid wood, veneer, bamboo and cork, the applicants can choose to fulfil and verify either requirements O6 and O7 below or new forestry requirements (both A and B) in appendix 10. It is not possible to mix between the two sets of requirements O6/O7 and A/B in appendix 11.

Requirement O5, O8 and O9 is valid regardless of which set of requirements (O6/O7 or appendix 10), that has been fulfilled.

O5 Wood fibre and waste wood in paper, cardboard and pulp

The requirement covers raw materials purchased as wood fibre in paper, cardboard and pulp. The requirement does not apply to paper labels attached to the product.

Nordic Swan Ecolabelled paper products as well as pulp and paper controlled under the existing Nordic Ecolabel basic module for paper, is automatically approved in this requirement.

Every year, at least:

1. 30% of the fibre raw material in paper, cardboard or pulp must come from forest areas in which operation has been certified under the forestry standard and certification system stated in Appendix 4c or which is certified as organically cultivated or where cultivation is in the process of being converted to organic production,

or

2. 70% of the fibre raw material in paper, cardboard or pulp must be recycled fibre or bi-products such as shavings or sawdust,

or

3. a combination of 1 and 2. If the fibre raw material in paper, cardboard or pulp consists of less than 70% recycled fibre, the proportion of fibre raw material from certified areas must be calculated according to the following formula:

Requirement for proportion of fibre raw material from certified areas in paper, cardboard or pulp (Y):

$Y (\%) \geq 30 - 0.4x$

where x = proportion of recycled fibre or bi-products such as shavings and sawdust.

✉ The declaration and any calculations from the supplier of the paper, cardboard or pulp that the requirement has been satisfied. The declaration must contain the name of the paper, cardboard or pulp. Appendix 3 may be used.

✉ Where points 1 or 3 apply, the paper, cardboard or pulp manufacturer must send a copy of the relevant forestry certificate which complies with the guidelines for forest certification and organic cultivation, as described in Appendix 4c.

✉ By using the Nordic Swan Ecolabelled paper, cardboard or pulp submit trade name and license number of the product. When using products controlled by the existing Nordic Ecolabel paper basic module the producer, production plant, name of mass or paper quality and grammage shall be described.

Background for requirement

The requirement is new, compared to the previous version. In the previous version, there was no requirement for either certified sustainability or recycled fibres or bi-products such as shavings and sawdust.

Paper, cardboard and pulp are constituents of several of the panel types in this product group. It is therefore judged that paper, cardboard and pulp have high environmental relevance for this product group. The environmental relevance relates to ensuring sustainable cultivation of wood raw materials and to permitting the use of recycled fibre in paper, cardboard and pulp and thus reducing the use of new wood fibre. Even though wood fibres are a renewable raw material, it is important to ensure that virgin wood raw materials are from sustainable forests in order to protect forest resources, biological diversity and socio-economic functions, etc.

In the case of recycled fibre and bi-products, which do not come directly from saw works, traceability back to the forest is not always available and thus there is reduced opportunity for documentation certified wood. The environmental benefit from using recycled fibre and waste wood lies mainly in avoided use of virgin wood raw material.

By using recycled fibre for paper, further resources are saved, as it is more demanding to produce paper from new fibres than from recycled fibre[24].

In the consultation, comments were received about if "controlled wood" could be used as documentation of the requirement. The answer to this is: "Controlled Wood" cannot be used to document the requirement. The purpose of "Controlled Wood" is to ensure that the non-certified wood in the product, do not come from controversial sources. "Controlled Wood" do not ensure, that wood or wood fibres is either recycled (post-consumer) or certified sustainable, like it says in this requirement. However, this requirement could be documented with a FSC Mix or PEFC Mix certificate, as this ensures 70% wood or fibre from sustainable forests or 70% waste wood or recycled wood fibres.

[24] Background for ecolabelling of paper products, Nordic Ecolabelling 2011.

Nordic Ecolabelling have after the consultation chosen to adjust the percentage of recycled fibres from 75% to 70%. Then the level fits with FSC Mix and PEFC Mix.

O6 Solid wood, veneer, bamboo and cork - origin and traceability

Constituent raw materials of solid wood, veneer, bamboo, cork and fibre products in the panel/moulding must comply with the following requirements.

Secondary raw materials from trees, e.g. palm leaves, are exempted from the requirement.

Residues and waste from other activities in the form of sawdust/wood chips/wood waste/untreated demolition wood and recycled wood fibres are exempt from this requirement. This requires, however, a statement from the supplier, that the raw material is residues, waste or recycled.

The licensee must:

- demonstrate traceability for all wood, veneer and bamboo materials.
- state the name (in Latin and one Nordic language) and geographic origin (country/state and region/province) of the kinds of wood and bamboo used.
- have a written procedure for sustainable wood and bamboo supply.

Wood, veneer and bamboo raw materials may not be sourced from:

- protected areas or areas in the process of being awarded protected status.
- areas where ownership or usage rights are unclear.
- genetically modified trees or plants.

Furthermore, forestry operations must not damage:

- standing natural timber, biodiversity, special ecosystems or important ecological functions.
- important social and/or cultural values.

Nordic Ecolabelling may require further documentation in case of uncertainty about the raw materials origin.

✉ Name (Latin and a Nordic language or English) and geographical origin (country/state and region/province/municipality) for the wood raw materials used. Appendix 4a must be used.

✉ The traceability system must be described. The Chain of Custody Certificate or certificate number on Traceability Certification may be used as documentation for point 2.

✉ Written routines for ensuring sustainable bamboo and wood supply. A requirement for a Chain of Custody Certificate from a supplier may be used as part of the procedure. The procedure must ensure updated lists of all suppliers.

✉ For residual, waste or recycled wood raw materials, a statement confirming this must be submitted.

Background for the requirement

The requirement has been updated to harmonise with Nordic Ecolabelling's most recent formulation of requirements for origin and traceability. At the same time, the requirement has been extended to include bamboo and cork.

Residues and waste from other activities in the form of sawdust/wood chips/wood waste/untreated demolition wood and recycled wood fibres are exempt from this requirement. This requires, however, a statement from the supplier, that the raw material is residues, waste or recycled. The reason for this is that it is often impossible to track these commodities back to the origin of the raw material.

Documentation is required as to how it will be ensured that forbidden wood raw materials are not used, cf. the criteria. In addition, the manufacturer must explain what wood types are being used and their geographical origin. There is still a limited supply of FSC and PEFC wood at the global level and hence a need to accept a minor proportion of non-certified wood in the panel. For wood raw materials FSC mixed and PEFC mixed, the requirement is for 70% certified wood (assessed as mass balance), with the rest as non-certified "controlled wood". FSC and PEFC "controlled wood" will automatically satisfy the requirement.

In many places, especially in the tropics, forests are being cleared to make way for other uses. These could be mining, different forms of agriculture or cultivation of soya, maize, palm oil, sugar cane etc. This requirement must thus ensure that the felled timber does not stem from natural forests or protected areas, etc., and that felling does not destroy or damage forest biodiversity or special ecosystems.

If a product comes from forests certified to a forestry standard approved by Nordic Ecolabelling, it is not necessary to provide further documentation of the requirement.

For example, Nordic Ecolabelling regards FSC and PEFC Chain of Custody (CoC) certification as examples of systems for corroborating the traceability of fibre raw materials.

The new EU Timber Regulation (995/2010) came into force in April 2013. The Timber Regulation covers the felling of timber and the production of wood raw materials both in and outside the EU. The aim of the regulations is to tackle the global problem of illegal logging and to counteract supply of and trading in illegally felled timber and timber products of illegal origin in the EU.

To a certain extent, the requirements of the Timber Regulation regarding businesses facilitate compliance with Nordic Ecolabelling's requirements for the origin and traceability of wood raw materials. However, the Timber Regulation does not completely meet Nordic Ecolabelling requirements for wood products, but may help to document the origin of the wood raw material. The Nordic Ecolabelling requirement that the wood raw material may not stem from natural forest, areas of high biodiversity, special ecosystems and important ecological functions, nor impair social and cultural assets, is not covered by the Timber Regulation. The Timber Regulation covers illegal logging and follows the legislation of the country in question. Hence it will not give sufficient assurance that the wood comes from sustainable forestry.

O7 Certified solid wood, veneer and bamboo

The requirement applies to solid wood, veneer, bamboo and cork included as raw material in the panel/moulding.

Secondary raw materials from trees, e.g. palm leaves, are exempted from the requirement.

Residues and waste from other activities in the form of wood waste and untreated demolition wood and recycled wood are exempt from this requirement. This requires, however, a statement from the supplier, that the raw material is residues, waste or recycled.

70% by weight of all solid wood, veneer, bamboo and cork must come from certified forests. Alternatively, the bamboo may be organically cultivated or the cultivation may be in the process of conversion to organic production. See the description in the background document to this requirement of which systems are accepted here.

The requirement may be documented as purchased wood, bamboo and cork on an annual basis either for the whole company or the Nordic Ecolabelled production alone (minimum 70% certified wood must be credited to the Nordic Ecolabelled production).

Certification must be performed by an independent third party.

Certification must be to a valid forestry standard, which fulfils the requirements for standards and certification systems laid down in Appendix 4c.

✉ The proportion (%) of certified wood or bamboo included in the applicant's annual Nordic Ecolabelled production. Appendix 4b may be used.

✉ Copy of forestry certificated signed and approved by a certification body or stating the certificate number.

Nordic Ecolabelling may require further documentation to assess whether the requirements for standards, certification system and certified proportion have been satisfied.

E.g. a copy of the certification body's approval report, a copy of the forestry standard including name, address and telephone number of the organisation which drew up the standard, and references to persons who represent the parties and interest groups invited to participate in the development of the forest standard.

✉ For residual, waste or recycled wood raw materials, a statement confirming this must be submitted.

Background to requirement

The requirement has been updated to harmonise with Nordic Ecolabelling's most recent formulation. The requirement has been tightened since the last version, as now 70% certified wood is required, compared to 50% before. At the same time, the requirement has been extended to include bamboo. Forestry entails an impact on the environment. From a life cycle perspective, forestry is an important part of the wood product's environmental impact. Forests may gradually become impoverished unless exploitation is sustainable, for instance if felling consistently outstrips continuous regrowth. This can lead to increased CO_2 emissions, which increase global warming, and it can damage the forest's biodiversity. Other examples of non-sustainable forestry management could be ignoring the needs of forest workers, small local communities or aboriginal peoples who depend on the forest for their livelihood. The use of wood, which cannot be documented as sustainable may risk stimulating such effects.

To reduce this environmental impact, requirements have been laid down that products based on raw materials made from solid wood must contain at least 70% by weight certified wood according to a standard for sustainable forestry.

At least 70% certified wood must be credited to the Nordic Ecolabelled production, but the requirement may be documented for the total production of the company.

Nordic Ecolabelling approves forestry standards (e.g. national standards) which fulfil the requirements of Appendix 4c of the criteria document. Information on approved forest standards can be obtained from Nordic Ecolabelling.

The supply of certified wood is continuously being increased and in the first quarter of 2013 amounted to a total of about 418 million hectares. There is still a potential for increasing this, and Nordic Ecolabelling wishes to make a contribution here by encouraging the use of certified wood in Nordic Swan Ecolabelled products. Table 14 shows figures from FSC and PEFC for the first quarter of 2013.

Table 14 Number of certified hectares at global level. Figures from first quarter 2013

	FSC (ha)	PEFC (ha)
Europe	74 150 774	77 464 673
North America	69 612 819	148 932 137
Central and South America	12 052 506	3 191 820
Africa	7 259 901	0
Asia	7 433 420	4 646 460
Oceania	2 464 027	9 914 708
Total	173 973 446	244 149 802

According to a market report from the UN, Western Europe has certified more than 50% of its total forest area, and Northern America more than one third, while Africa and Asia have only certified 0.1%. In tropical areas, 40% of the certified forest areas are based on certification schemes that are not certified by third parties.

Residues and waste from other activities in the form of wood waste, untreated demolition wood and recycled wood are exempt from this requirement. This requires, however, a statement from the supplier, that the raw material is residues, waste or recycled.

The reason for this is that it is often impossible to track these commodities back to the origin of the raw material and thus not possible to document the raw materials as certified from sustainable forestry.

Bamboo

There has been a strong increase in demand for bamboo products, and Nordic Ecolabelling therefore wishes to ensure that this raw material is not sourced from areas where conservation of biodiversity or social assets are threatened. Bamboo is a type of grass and is the fastest growing plant in the world. It can be harvested after approximately 7 years, without any of the plant dying. It is often claimed that bamboo is harder than deciduous timber and thus well-suited for flooring, chopsticks, salad bowls etc. More than 1,200 species of bamboo are found in Asia, Central America and South America, as well as some species in parts of Africa and Australia, and the species have various uses.

Bamboo grows wild like a weed and generally does not require pollination or spraying. Bamboo is also used to prevent soil erosion in vulnerable areas. When bamboo is felled, new shoots grow on the stump that is left. This also makes it difficult to remove bamboo once it has become established.

Due to the increased pressure on bamboo today, there is a risk that forest felling and use of pesticides and fertiliser may destroy well-functioning ecosystems. According to Inbar (International Network for Bamboo and Rattan) bamboo is a natural resource and is extracted from uncontrolled natural forests in South Western China. But in many areas, poor felling practices can jeopardise the fauna that depend on bamboo (such as the red panda (bear cat) and the Giant Panda) and generally undermine ecosystems. Bamboo is also cultivated in plantations of different types.

Today bamboo can be certified according to a sustainable forestry standard, or certified as organically cultivated. Fibre raw material that is certified as organically cultivated or which stems from areas that are being converted to organic production must be cultivated in accordance with EU regulation 2092/91 or 834/2007 or cultivated in similar fashion under an equivalent certification system, e.g. KRAV, SKAL, IMO, OCIA, etc.

Nordic Ecolabelling has not developed its own requirements for sustainable production of biomass, but has chosen to lay down a requirement that sustainable production of biomass must satisfy existing forestry and certification standards or schemes.

O8 Use of biocides in tree and bamboo felling

The requirement applies to solid wood, veneer and bamboo as constituent raw materials.

After felling, the wood must not be treated with pesticides with WHO classifications 1A and 1B.

The requirement relates to the treatment of logs after felling.

WHO classification: An overview can be obtained from internet address htttp://www.who.int/ipcs/publications/pesticides_hazard/en/, "The WHO recommended classification of pesticides by hazard and guidelines to classification 2009" or on application to one of the secretariats.

✉ A statement from the wood suppliers as to the pesticides used and a declaration in accordance with Appendix 4a for each product.

Background for the requirement

Wood (logs after felling) must not be treated with pesticides with WHO classifications 1A and 1B. These pesticides have a negative impact on the environment. Insect attacks can often be remedied in other ways, e.g. by keeping the wood covered and dry.

The requirement has not been changed from previously, but the reference to the WHO website has been updated to refer to the latest list of recommended pesticides.

Specific requirements for paper and cardboard (incl. craft paper)

The requirements apply to paper or cardboard (incl. craft paper) which constitute > 10% by weight of the finished panel/moulding. The requirement should therefore be documented for paper and board materials, which individually represent more than 10% by weight of the panel/moulding.

O9 Emissions of COD from paper and cardboard production

The total emissions of acid-consuming organic material (COD - chemical oxygen demand) to water must be less than the specified COD value in Table 15 for the paper or cardboard used (for unfiltered sample). Each type of pulp has its own level in the requirement. The COD emission from pulp production must be included in the total COD calculation for the paper or cardboard used.

COD emissions is thus calculated by adding the emissions COD mass kg/ADT (weighted mean of incoming pulps) + COD emission paper machine kg/t.

Nordic Swan Ecolabelled paper products as well as pulp and paper controlled under the existing Nordic Ecolabel basic module for paper, is automatically approved in this requirement.

Table 12 Total COD requirement levels for different pulp and paper types

Pulp type	Total COD level kg/ADt for pulp and paper
Bleached chemical pulp (sulphate and other chemical pulps except sulphite pulp)	22.0
Bleached chemical pulp (sulphite pulp)	29.0
Unbleached chemical pulp	14.0
CTMP pulp	19.0
TMP/Ground wood pulp	7.0
Recycled fibre pulp	4.0

☒ Submit a description of the sampling programme, including measurement methods, measurement results from previous 12 months and measurement frequency, see also Section 1 of Appendix 1.

☒ By using the Nordic Swan Ecolabelled paper, cardboard or pulp submit trade name and license number of the product. When using products controlled by the existing Nordic Swan Ecolabel paper basic module the producer, production plant, name of mass or paper quality and grammage shall be described.

Background for the requirement

The requirement has been updated with differentiated requirement levels according to the type of pulp or paper used. The criteria now include several different panel types in which paper or cardboard may be used. Hence, greater controllability in the requirement is achieved by having requirement levels suitable for the specific paper and pulp types.

All pulp processes and paper production emit COD (chemical oxygen demand), P (phosphorus) and N (nitrogen). Contaminants in emissions to water consist of dissolved organic material from wood and bark, fibres and residues of boiling, bleaching and paper-making chemicals, indicated as the content of oxygen-consuming substances, COD, together with the fertiliser components phosphorus, P, and nitrogen, N. The organic matter is broken by micro-organisms with the use of oxygen.

This can lead to depleted oxygen levels - and in some cases, completely oxygen-free conditions - in the aquatic environment. This can have a negative effect on fish and benthic animals.

The requirement level is based on the latest BAT for both the pulp and the paper production values from the BREF document of 2014.

Table 136 BAT for both the pulp and the paper production

Pulp and paper types	BAT REF 2014 kg/ADt (for paper the unit is kg/ton)
Bleached chemical pulp (sulphate and other chemical pulps except sulphite pulp)	7-20 kg/ADt
Bleached chemical pulp (sulphite pulp)	3-10 kg/ADt
Unbleached chemical pulp	5-8 kg/ADt
CTMP-pulp	12-20 kg/ADt
TMP/Ground wood	0,9-4,5 kg/ADt
Recycled fibre pulp	0,4-1,4 kg/ADt (deinked 0,9-3) kg/ADt
Paper machine (not special paper)	0,15-1,5 kg/ton

Previously there were requirements for bleaching of paper and for surfactants for decolourising recycled fibres. These two requirements have now been omitted, as it is deemed more relevant to set an energy requirement for paper production. The criteria have therefore been expanded with an energy requirement for paper and pulp production.

4.3.3 Resources

The growth in the world economy and the growing world population (forecast: 9 billion in 2050) mean that the world's resources are being quickly depleted. Higher demand for certain resources will lead to shortages. It is therefore necessary to manage resources more effectively throughout their life cycle. In the part of the resources' life cycle covered by the

production of construction and facade panels, it is therefore important to increase the use of recycled and renewable materials in order to reduce the drain on resources.

Nordic Ecolabelling considers it important for the product group, that the criteria ensures recycling of raw materials. In Denmark the construction industry generates 39 percent of Denmark's total waste[25]. It is therefore important to ensure more resource efficient building materials and buildings. It is decided to set the same minimum requirement at 30% recycled or renewable raw materials for facade and building panels regardless of whether it is a plasterboard, mineral wool, cement slabs. For plasterboard the requirement goes further than the 30% recycled material.

Here it is not accepted virgin gypsum raw materials at all. The requirement requires at least 20% demolition plaster and the rest as industrial gypsum (from flue gas cleaning). Wood-based panels and HPL panels consists by definition of high content that renewable raw materials in the form of respectively wood raw material and paper and hence there is no requirement for those panel types in this section. Instead, requirements on either recycled or certified sustainable wood and paper materials are set in section 4.3.2.

O10 Resource requirements for plaster

As a minimum, at least 20% by weight of recycled gypsum must be used in the plasterboard/moulding, in the form of waste gypsum from demolition and refurbishment of buildings.

The remainder of the constituent gypsum raw material must be industrial gypsum (residual product from power stations).

This requirement may be documented as an annual average for the production of the plasterboard/moulding.

☒ A declaration from the recycled materials supplier, showing the amount of recycled material received in accordance with the requirement. Appendix 5 may be used.

☒ Applicant's calculation showing that the requirement level has been reached.

Background for the requirement

The requirement is new since the previous version of the criteria.

Plasterboards are produced from natural gypsum, industrial gypsum and waste gypsum powder. Natural gypsum is won from mines, mainly in Europe and USA.

Industrial gypsum is a residual product from flue gas scrubbing for sulphur dioxide in coal-fired power stations. Waste gypsum comes from demolition and refurbishment of buildings. Both industrial gypsum and waste gypsum powder thus replace natural gypsum. Volumes of gypsum waste from building work, demolition and renovation of buildings in Denmark in 2009 were estimated at 54,000 t. Only 22,500 t of this went to either plasterboard production or cement production. The rest went to composting and for covering slag heaps (e.g. in Germany).

Recycled gypsum is here defined as waste gypsum from demolition and renovation of buildings. Here a potential has been identified for ensuring that plasterboard production is designed to handle waste gypsum, so that waste gypsum does not go to composting or covering purposes, where the environmental benefit is lower. At the same time, there is also a potential for increasing the amount of waste gypsum collected from the building

[25] http://www.kebmin.dk/nyheder/klimaminister-oensker-mere-baeredygtigt-byggeri

industry. The percentage has been set to 20%, as the plasterboard manufacturers are dependent on the quantity of waste gypsum collected.

Most Danish industrial gypsum is reused, either by sale to the plasterboard industry or for cement production at Aalborg Portland. The fraction, which is not reused does not meet the manufacturers' quality requirements.

It must be anticipated that the volume of industrial gypsum will fall in the future, as coal is superseded by biomass or other sustainable energy source, which does not generate as much sulphur pollution as coal. This means that the need for natural gypsum will rise in the first instance. Hence there is no potential for encouraging increased use of industrial gypsum in plasterboard production. What can be used will be used, and the volumes can only be increased by increasing the use of power and district heating stations. Therefore, the biggest environmental benefit is from encouraging greater use of waste gypsum from buildings.

The requirement level is set at 20%, as gypsum producers cannot control how much plaster is collected from demolition. The requirement shall nevertheless ensure that plasterboard productions are ready to apply demolition plaster in their plate production[26].

The processing of gypsum waste to make gypsum powder for either manufacture of new plasterboards or use in cement production represents two environmentally equivalent solutions, although plasterboard production is slightly better than the cement solution from a socio-economic perspective. This can be seen from an analysis performed by the Danish Environmental Protection Agency in 2012[27]. Both solutions give the same environmental savings, largely from the substitution of natural gypsum. Apart from use in the production of new plasterboards or for cement production, gypsum waste can be used for composting or used for covering.

In the Nordic market, Gypsum Recycling has a presence throughout the region. According to the Gypsum Recycling website, large plasterboard manufacturers such as Norgips, Knauf Danogips and Saint-Gobain (with sub-brands Gyproc and Rigips) use about 20 to 25% recycled gypsum in their plasterboards. Thus the remaining 80% could be industrial gypsum.

In Denmark, there are also the two firms Freiberg & Jespersen and PR Slam, each of which has a technology for producing gypsum powder, and all three seem able to process the powder to a quality, which can be employed for demanding uses such as cement and plasterboard production. The financial difficulty of selling waste gypsum powder seems to be due to the powder reaching a poor price compared to natural gypsum, including shipping transport. The poor price must be assumed to be due to the very limited competition between purchasers of waste gypsum powder. One of the few reasons which gives the plasterboard manufacturers an incentive not to charge (or not to charge more) for the gypsum powder is that the gypsum waste is increasingly sold for composting and covering purposes. Without these two processing forms, plasterboard manufacturers would be able to set higher prices, as in practice they would have a local monopoly on the purchase of gypsum powder for reuse.

[26] Life cycle assessment and social economic assessments of different alternatives for handling and treating gypsum waste, MST 2012
[27] Ibid

However, some of the gypsum waste processors are working to expand the market for sales of waste gypsum powder to other manufacturers who use gypsum.

It is therefore assessed that there is a potential for requiring a certain proportion of recycled gypsum in the plasterboard. On looking through the EPDs for plasterboards, it can be seen that there are examples of plasterboards with a content of recycled gypsum of 2% and others which have up to 99%. However, this includes both waste gypsum and industrial gypsum, and the two are not necessarily stated separately.

O11 Resource requirements for cement based and mineral wool panels/mouldings

As a minimum there must be 30% by weight recycled or renewable material in the panel/moulding. The requirement may be documented annually for the panel production

For mineral wool panels/mouldings an exemption is given from this requirement if the reduced energy requirement of 10 MJ/kg in requirement O16 can be fulfilled.

In this requirement recycled raw materials are defined as post-consumer, cf. definition in ISO 14021 and waste products such as fly ash and industrial slag.

✉ A declaration from the recycled materials supplier, showing the amount of recycled material received in accordance with the requirement. Appendix 5 may be used.

✉ Applicant's calculation showing that the requirement level has been reached.

Background for the requirement

The requirement is new since version 5 of the criteria. It is decided to set the same minimum requirement at 30% recycled or renewable raw materials for panels regardless of whether it is a plasterboard, mineral wool, cement panels. HPL panels consists of about 50% paper raw materials and thus high that renewable raw materials. For wood-based panels, which consists mainly of renewable raw materials, requiring either certified sustainable raw materials or recycled wood raw material. Recycled raw materials are defined as post-consumer according to the definition of ISO 14021 as well as waste products such as fly ash.

Mineral wool panels

Fibreglass may have a high content (> 60%) of reused materials: household glass, discarded bottles, internal waste from fibreglass production process, etc. In fibreglass production it is common to reuse batch waste, fibreglass fragments and dust from collection systems directly in the furnace. Part of the fibreglass waste cannot be recycled directly in the melting furnace due to a content of organic binders, unless this organic fraction is removed by specific treatment of the waste.

In stone wool processes, fibre waste can be reused by crushing/pulverisation. Selvedge from the stone wool can be pulverised and recycled[28].

For stone wool panel production is it not equally possible to use post -consumer recycled material. Especially for thin acoustic panels. There is therefore given an opportunity to be exempted from the requirement of post -consumer recycled material in the mineral wool panel, if the panel production instead is very energy efficient and thus can fulfil a more stringent energy requirement of 10 MJ/kg panel instead of the obligatory 20 MJ/kg panel. This additional saved energy in the production, can be seen as a form of compensation for the extra energy used for extraction of 100% new raw material to the panel. Stone wool

[28] BAT Reference Document for the Production of Glass, EU Commission 2012

panels using raw materials including basalt, limestone, dolomite and sand, which are not considered as critical resources seen in a supply perspective[29] [30].

However, internal production waste does not count in the requirement, as it is assumed that it is profitable to reuse this fraction, and that it will always be reused as much as possible. Additionally, this cannot be compared from an environmental point of view with post-consumer recycled mineral material.

A high potential is seen here for ensuring the use of post-consumer recycled fibreglass and stone wool or other recycled raw materials for new production of mineral wool. The requirement also reward the use of renewable raw materials. For this panel type there are normally not used renewable raw materials.

Cement based panels
The main material in cement-based panels is often cement. There may be up to 80% cement in some panels, but there are also panels with a cement proportion down to around 30%. Especially facade panels include a high cement content.

A high content of Portland cement (basic cement, cf. EN 197-1) in the panel leads to an overall high energy impact and thus correspondingly high use of resources in respect of consumption of energy raw materials.

The commonest energy raw materials for cement production are the different conventional fossil and waste-based fuels[31]. A reduced cement proportion could thus reduce the resource demand for fossil raw materials. Portland cement consists of 95 to 100% cement clinker (mineral raw material) and is thus almost unmixed, apart from a small proportion of possible additives.

The cement helps to make the panel humidity-resistant and weather proof and give it good fire inhibiting properties. However, there are also examples of cement-based panels, which are non-flammable and only contain around 40% Portland cement. Parts of the Portland cement can be replaced with other mineral raw materials, which are waste raw materials from other industries. One example of this would be fly ash.

Apart from the cement, renewable fibres such as wood fibre (lignocellulose fibre between 2.5 and 3 mm) are often also included, often in varying amounts depending on panel type (between 3 and 30%). The wood fibres may be either virgin or recycled. Finally water and inorganic fillers such as sand, lime, silicates, kaolin and aluminium hydroxide are used. In certain panels, the wood fibre is replaced by synthetic fibres, such as PVA fibres.

A potential has been identified for ensuring a high use of recycled raw materials (recycled fibres) and waste products such as fly ash and industrial slag as materials in the panel. For example, fly ash could replace part of the cement in the panel in quantities more than 30%.

[29] REPORT ON CRITICAL RAW MATERIALS FOR THE EU, NON-CRITICAL RAW MATERIALS PROFILES 2014
[30] Flörke et al (2008), Silica. Ullmann's Encyclopedia of Industrial Chemistry.
[31] Reference document on best available techniques in the cement, lime and magnesium oxide industries, 2010

4.3.4 Energy

General background for energy requirements

The smallest environmental impact from energy is from energy we do not use. An improvement of the construction panel's total energy efficiency will thus entail lower energy consumption and thus lower the CO_2emissions. A reduction in energy consumption will thus help lower the consumption of fossil raw materials and reduce the greenhouse effect and, with it, global warming.

As most of the energy raw materials used are still fossil-based, energy reduction will lead to overall reduced consumption of fossil raw materials, regardless of the energy sources used.

For construction and facade panels, there is generally high environmental relevance associated with energy consumption in material production and the actual panel production. Several of the production systems have processes, which use a great deal of heat or pressure, and some panel types use energy-intensive and/or CO_2intensive materials.

The energy requirements have been changed since the previous version. The requirement is now a pure energy requirement without weighting with other parameters such as certified and renewable raw materials. The latter parameters are dealt with by specific requirements where relevant.

Differentiated energy requirements

There is a wide variation of material types and production processes among the different panel types. It has therefore been decided to set differentiated energy requirements formulated in a life cycle perspective for the individual panel types within the product group. This achieves the best controllability of the energy requirement.

The product group comprises the following panel types: wood-based panels (including laminated wood panels), HPL panels, plasterboards, mineral panels and cement-based panels.

As the individual energy requirements have been set on the basis of the environmental impact of the specific panel type's life cycle, these may have different system limits, and in such cases the requirements are not mutually comparable. This accords with the idea that the product group consists of several functional units, and it is thus not the intention to pinpoint the overall best type of construction panel. Instead, each panel type (HPL panels, wood-based panels, plasterboards, mineral wool panels and cement-based panels) is a separate functional unit and the aim of the criteria is to find the best panels within the individual panel type.

Applied energy

For all panel types, it has been assessed that an energy requirement in this product group will best encourage a reduced environmental impact if the requirement relates to the actual energy applied and not to the primary energy. The requirement must therefore be documented in the form of applied energy without use of primary energy factors. In this case high potential or controllability has not been identified for an energy requirement which encourages specific fuel sources. Heat energy is the biggest energy item in the actual panel production systems. Most types of panel production systems are mainly based on fossil fuels, and some manufacturers still need to alternate between different types of

fossil fuel. Only in the production of wood-based panels is there local application of a high proportion of renewable fuels. Here the waste wood of insufficiently high quality for the panels is put to use. It has therefore been assessed that the maximum controllability lies in ensuring reduced energy consumption in the panel and not in encouraging specific fuel sources. However, it is desired that the fuel sources applied should be indicated when documenting the requirements for panel production systems, as this information is relevant for future revisions of the criteria.

The main aim of the Nordic Ecolabelling energy requirement is to promote high energy efficiency. Hence, the requirements are formulated with requirement levels in the form of applied MJ/kg panel (can be converted to kWh/kg by dividing by 3.6).

Where energy requirements are also set for materials production, the functional unit could be MJ/kg material. The panels are produced in very different thicknesses and thus MJ/m^2 as a parameter in an energy requirement for panel production would not permit comparisons to be made. A functional unit in the form of MJ/kg has thus been selected.

Common to most of the panel production systems is that the main energy applied is heat energy (often around 80% of the total panel production energy), and that electric power and heat energy are sometimes correlated. For instance, this could be through the installation of heat exchangers, which provide a lower rise in power consumption, but may also reduce heat consumption considerably.

By setting a total requirement for electricity and heating, the applicant gains flexibility for ensuring energy-efficient production, while the requirement encourages an overall low energy consumption (this does not apply to the applied fuel in the requirement for paper production).

As the total energy impact of the panel in its life cycle is often also correlated with the use of recycled materials, the requirements for recycled materials must be regarded as both a resource requirement and an energy requirement. For plasterboards and mineral wool and cement-based panels, it was found that a requirement for a certain proportion of recycled material in the panel is an important parameter for the product's energy performance. Further requirements for recycled materials can be seen in requirements O10 to O11.

The Nordic Swan Ecolabelled panel/moulding must either comply with requirements O13, O14, O15, O16 or O17 depending on the product's material. Although the requirements below refer to panel production, the requirements also apply to mouldings produced in similar material.

O12 Energy requirements for paper and pulp production

The requirement covers paper and pulp which individually are present at more than 30% by weight in the finished panel/moulding.

Nordic Swan Ecolabelled paper products as well as pulp and paper controlled under the existing Nordic Ecolabel basic module for paper, is automatically approved in this requirement.

The following requirements must be satisfied for paper or pulp:

$P_{electricity(total)} < 1.25$

$P_{fuel(total)} < 1.25$

P stands for energy point for paper/pulp production. In $P_{electricity(total)}$ and $P_{fuel(total)}$, energy points are included from both paper production and the pulps used in the paper. See further explanation in Appendix 6.

☒ The pulp and paper manufacturer must submit a calculation according to Appendix 6, which shows that the points limits are being satisfied. The calculation sheet developed by Nordic Ecolabelling must be used for the calculation.

☒ By using the Nordic Swan Ecolabelled paper, cardboard or pulp submit trade name and license number of the product. When using products controlled by the existing Nordic Ecolabel paper basic module the producer, production plant, name of mass or paper quality and grammage shall be described.

Background for the requirement

In panels where the paper fraction forms a high proportion of the material composition, the paper makes a significant contribution to the panel's total energy impact. Relevance has therefore been identified for an energy requirement for both pulp and paper production for paper types present in the panel by more than 30% by weight. The energy requirement for paper has been taken from the Nordic Ecolabelling basic module for paper and requires specific data and calculations from the paper manufacturer.

Due to the high level of documentation, it has therefore been assessed that the requirement should only come into force for paper proportions above 30% by weight. This has been supplemented with a reference value for production of craft paper in order to adapt the requirement to this product group. Appendix 6 gives a detailed description of the energy calculation.

Depending on the type of panel, the paper may occur in different weight percentages. In plasterboards, the paper proportion is often around 5% by weight, but may be higher. For HPL panels, around 50-60% craft paper and 2-15% decor paper is often used. In addition, paper may occur in both cement-based panels and mineral wool panels.

The principle behind the energy requirement in the Basic Module for paper is that manufacturers of different pulp and paper types calculate specific values for both the electricity consumption and the fuel used in their production. This is done by totalling the energy consumption for the different part-processes. In order to calculate energy points for heat consumption and electricity consumption, the actual specific electricity consumption or fuel consumption is divided by the relevant reference values in Appendix 6.

The requirement has been developed for the Nordic Ecolabelling basic module for paper, and the associated reference values are based on BAT values from the so-called BREF document, drawn up in accordance with the EU IPPC Directive, published in 2000. The reference values were formulated in 1999.

Points limit for energy

Along with comparison with the reference value, energy use is controlled by a points limit.

This limit defines by how much the paper's total energy consumption may exceed the optimum figure.

A point limit of 1.25 indicates that the average total energy consumption of the paper may be no more than 25% higher than when the energy use is at the level of the reference value. The point model allows higher energy consumption in order to provide flexibility for the paper manufacturer.

See a further explanation of this requirement in the Nordic Ecolabelling basic module version 2, which can be requested from Nordic Ecolabelling.

O13 Energy requirements for HPL panel production:

The requirement covers the applied energy for production of the panel and may be documented either for the Nordic Ecolabelled panel production or for the company's total annual production of HPL panels.

HPL panels ≤ 2 mm thin:

No more than 18 MJ/kg panel may be used for producing the panel.

HPL panels > 2 mm thick:

No more than 14 MJ/kg panel may be used for producing the panel.

The requirement does not include extraction of resources or production of incoming raw materials. Paper has its own energy requirements in O12. Self-produced energy and resold surplus energy should be stated, but will not count as applied energy in the calculation.

✉ A calculation should be submitted documenting compliance with the requirement. The calculation must contain information about: quantity of produced panels, sub-divided into thick and thin, applied electricity and fuel, and which fuel sources are being used.

Background for the requirement

There is RPS for energy requirements in the actual HPL panel production. A wide variation in energy consumption has been detected in panel production. From the sector EPD of 2010 from ICDLI – International Committee of the Decorative Laminates Industry – an average variation of 50% among the 10 production systems covered by the EPD can be identified. This variation is mainly due to the materials efficiency and energy efficiency of the HPL production system, and to different energy sources.

At the same time, HPL production is a very homogeneous production type in terms of materials composition.

The sector EPD describes the following materials composition: decor paper 2-12%, craft paper 55-62%, melamine resin 2-12% and phenolic resin 20-32%[32]. In addition, various additives are used to a minor extent, e.g. aluminium hydroxide or aluminium oxide, which are used as the top coating above the decor paper, and any UV protection for HPL panels for external use.

The limited materials variation stated in the sector EPD means, that the variation in energy consumption in production is mainly due to energy efficiency in the actual panel production. The potential for energy improvements in panel production lies in reducing heat consumption by reusing process heat.

Electricity and heat energy are correlated in HPL production, as, for example, a heat pump may use electricity but is capable of reducing heat consumption. A requirement has therefore been set for the total energy consumption, in order to permit flexible interaction between electricity and fuel consumption.

The actual resin fraction also contributes to the panel's energy impact. Here, energy consumption stems especially from the production of the constituent raw materials in the adhesive, and should therefore be capable of documentation by data several links behind in the product chain. Even so, the potential for energy reduction is unclear. Together with

[32] EPD for Decorative High-Pressure Laminates, International Committee of the Decorative Laminates Industry (ICDLI), 2012

the low controllability, it is therefore judged that no energy requirement for the resin should be set at the present time.

Table 147 Energy data for HPL panels

HPL – mm thickness	Energy for materials, total primary energy requirement, cradle to gate [MJ/kg]	Energy for production, total primary energy requirement [MJ/kg]	Applied energy in panel production MJ/kg (not primary energy)
Max Compact & Max Exterior panels 8 mm*	67	4.5	3
Max Thin panel 1 mm*	66	13.7	8.9
Egger EPD		18 to 33	Unknown
HPL Sector EPD** - 8 mm	76	30.8	19.2
HPL Sector EPD** -0.8 mm	76	116.6	64.6

**These values are in principle specific to the EPD, but have been calculated by subtracting the generic material energy and calculating back to the applied energy from the primary energy.*

***The values have been taken from the ICDLI sector EPD, which states the average for 10 different European HPL manufacturers.*

It is possible to make use of self-produced energy in HPL production. For example, by collection of VOC emissions and later recovering the energy by combustion. Self-produced energy does not count in the requirement, but must be indicated when documenting the requirement. The same applies to surplus energy from production, which is sold to another user.

During the revision of the criteria, Nordic Ecolabelling has collected various energy data for HPL panel production. These include commissioned a report with energy mapping of different types of panel productions. The collected energy data for HPL panels shows that there are large variations in energy consumption expressed in MJ/kg produced HPL panel. For example, energy data from HPL manufacturers from the International Committee of the Decorative Laminates Industry (ICDLI) shows great variation (table 17).

The found energy data also shows that there is a big difference in energy consumption between thin and thick HPL panels, when the unit is MJ/kg. Here, the thin panels have higher energy consumption per kg panel, than the thick. This can be explained by the smaller units in an identical manufacturing process. This gives a lower energy efficiency when comparing with larger units (thicker panels) per kg.

Because of that a differentiated requirement level is set for thin HPL panels (< 2 mm) and thick (> = 2 mm) compact laminate panels. The ICDLI EPD also sub-divides HPL panels according to thickness in the same way.

In the consultation draft very ambitious requirement levels was proposed. The comments in the consultation pointed out, that these values were too harsh and the requirement of energy for the production of HPL panels is therefore adjusted after the consultation. The requirement level in the consultation proposal was < 10 MJ/kg for panels < 2 mm in thickness and is subsequently adjusted to < 18 MJ/kg. The requirement of < 6 MJ/kg for panels > 2 mm in thickness in the consultation proposal is now adjusted to < 14 MJ/kg.

Data from the HPL Industry EPD from the International Committee of the Decorative Laminates Industry (ICDLI) indicates an average value of 19 MJ/kg for thick panels and

64 MJ/kg for thin panels for the production. Then the final requirement levels of a maximum of 14 MJ/kg and 18 MJ/kg are ambitious requirements.

O14 Energy requirements for wood-based panels

Energy consumption is calculated as an annual average for either just the Nordic Ecolabelled production or for the whole enterprise. Energy consumption calculated as MJ/kg panel must include the primary panel production and the production of the constituent main raw materials. Main raw materials are the raw materials which make up more than 2% by weight of the finished panel (for example wood fibre and adhesive).

System boundary for the requirement: Energy consumption for obtaining raw materials is not included in the calculation. For the panel production, the energy calculation must be based on data available from the time of raw materials handling (including drying of wood and conveyor belts both in the saw works and on the production line) up to the finished product prior to any surface treatment. The calculation is thus exclusive cultivation and felling the tree, but including wood drying and conveyor both at the saw mills and in the production line and the panel production. Transport in all phases and energy consumption by surface treatment should not be included. Lamination of the panel should be included in the calculation.

Energy consumption for surface treatment must not be included. In production of chemicals such as adhesives, the energy calculation is based on data available from the time of the production of the adhesive and of the constituent raw materials. The energy content of the raw material must not be included. In exceptional cases, a table value for adhesive of 15 MJ/kg (ready-to-use solution) may be used.

When using multiple suppliers for the same type of raw material it is accepted, that the calculation is done using the most frequently used supplier.

Chipboards:
No more than 7 MJ/kg panel may be applied for producing panels (excluding any surface treatment).

Other wood-based panels:
No more than 11 MJ/kg panel may be applied for producing panels (excluding any surface treatment).

In relation to fuel energy, then both energy from purchased fuel, domestically produced fuel and energy from waste products are included. The requirement does not include extraction of resources. Self-produced energy and resold surplus energy should be stated, but will not count as applied energy in the calculation.

✉ A calculation should be submitted documenting compliance with the requirement. The calculation must contain information about: quantity of produced panels, applied electricity and fuel, and which fuel sources are being used.

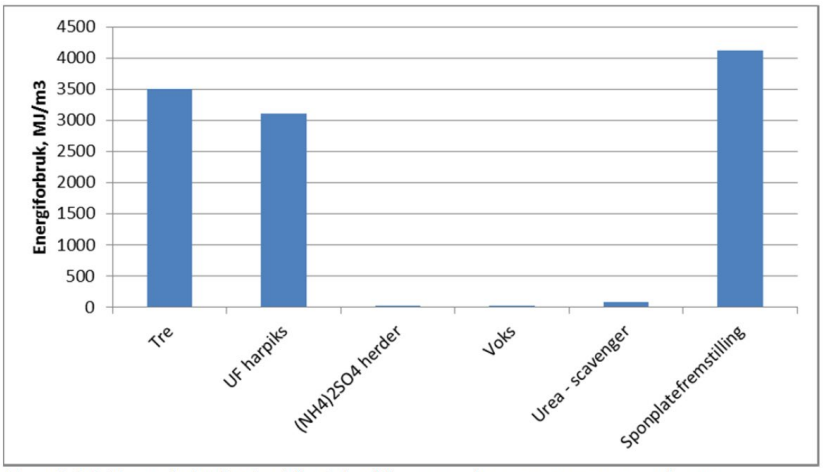
Background for the requirement

An energy requirement is set with the same system boundary as in the present version. However, the requirement has been changed so that it is now an absolute requirement for applied energy without weighting for certified and recycled raw materials and fuel sources (as in the previous version of the criteria). The requirement level is expressed as applied MJ/kg panel and thus is solely aimed at energy consumption in panel production, including production of raw materials such as processing and drying of wood and production of adhesive and of the raw materials for the adhesive. The system limit for the energy requirement for wood-based panels also includes the production of main raw materials (except for cultivation and extraction of raw materials).

The reason for this is that, in respect of wood-based panels, RPS (Relevance, Potential and Steer ability) has been identified for letting the energy requirement additionally cover the drying of the wood, both at the saw works and by the panel manufacturer. It has been

assessed that there is low controllability for obtaining specific production data for production of both the adhesive and of the raw materials in the adhesive. Nor has it been possible to identify any potential in relation to energy-efficient adhesive production. The requirement thus contains an option for applying a table value for the adhesive of 15 MJ/kg adhesive. This ensures that the adhesive counts in the wood panel's energy calculation and that there is no advantage in using more adhesive than necessary.

Table 18 Energy consumption for chipboard production, cradle to gate[33]



Figur 9.3.2. Energiforbruket fordelt på de ulike prosesskomponentene vugge til port.

The energy impact of the production of a chipboard panel, including material production, breaks down as approx. 40% energy for the actual panel production and approx. 30% from wood production, with adhesive production also at 30%, cf. Table 18. The highest controllability for regulating energy consumption lies in the actual panel production. The potential for energy improvements in panel production lies in reducing heat consumption by reusing process heat. Heat consumption can be optimised by ensuring suitable operation of the drying process by adjusting drying temperatures and times to make effective use of energy and by selecting the lowest optimal drying temperature, while still achieving the necessary final moisture content.

At the same time there is an opportunity for completely closed recirculation of flue gases from the drying processes when drying the wood particles. This can be used for chipboard and OSB production[34].

The adhesive generally makes up 10-12% by weight of a chipboard panel, but out of the total energy consumption for a panel (cradle to gate), the adhesive accounts for 30%[35]. The actual adhesive production (mixing the finished adhesive) is not particularly energy-intensive. Here, depending on adhesive type, between 0.4 and 1.6 MJ/kg is applied. The majority of the energy for adhesive production stems from the production of raw materials such as melamine, urea, phenol and methanol, which are present in UF, MUF, PF and PRF adhesives.

As the greatest energy relevance for the adhesive lies in the raw materials production, it can be difficult to obtain data for this, as it is several links back in the product chain. An option has therefore been given for using a table value for the adhesive contribution. The

[33] Adhesive systems for laminated wood and chipboard, Sintef 2012
[34] BAT Reference Document for the Production of Wood-based Panels, EU Commission Draft 2013
[35] Adhesive systems for laminated wood and chipboard, Sintef 2012

table value is 15 MJ/kg adhesive and represents the same system limit as is used in the requirement. The value thus does not include the extraction of the crude oil, but only the actual production of raw materials in the adhesive and the production of the adhesive.

O15 Energy requirements for plasterboards

The requirement covers the applied energy for production of the panel and may be documented either just for the Nordic Ecolabelled panel production or for the company's total annual production.

No more than 4 MJ/kg plasterboard may be applied for total applied electricity and fuel in panel production.

The requirement does not include extraction of resources and production of incoming raw materials. Paper has its own energy requirements in O12. Self-produced energy and resold surplus energy should be stated, but will not count as applied energy in the calculation.

✉ A calculation should be submitted documenting compliance with the requirement. The calculation must contain information about: quantity of produced panels, applied electricity and fuel, and which fuel sources are being used.

Background for the requirement

With plasterboard, the materials contribute more or less the same as the actual panel production, if 100% natural gypsum is used. The greater the proportion of recycled gypsum in the panel, the greater relative significance the actual panel production will have from a pure energy point of view.

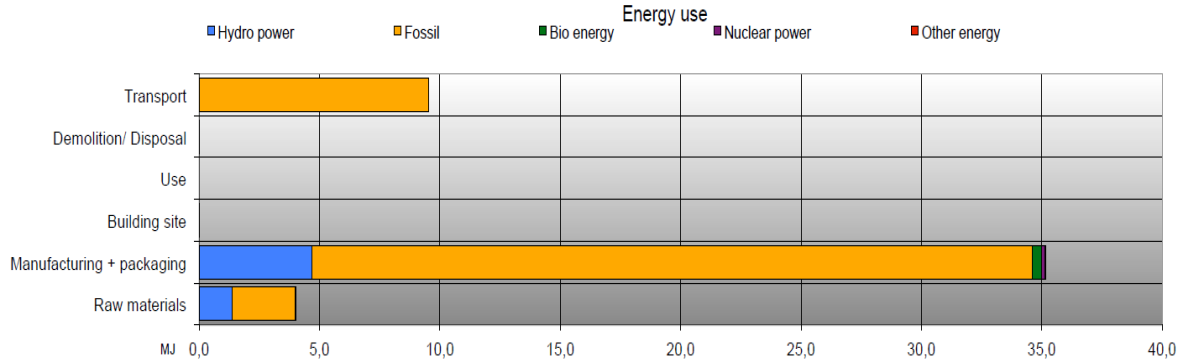
Panels with a high content of recycled or industrial gypsum appear to have the greatest energy relevance for the production of plasterboards. Production is not particularly energy-intensive, but many heat-using processes are applied, which thus give a potential for optimising energy efficiency of production. In the actual panel production, approximately 90-95% of the energy applied is heat energy and the remainder is electricity (according to consultant's report from Force in 2013). Fossil-based fuel energy is the main source used, in the form of natural gas and, rarely, biomass.

Figure 4 shows the energy impact of a plasterboard with approx. 99% recycled plasterboard (industrial gypsum + waste gypsum).

This reduces the energy impact of raw materials considerably. As the criteria require a certain proportion of recycled gypsum in the panel in requirement O10, the highest energy relevance, potential and controllability lie in the requirement for the actual panel production.

The majority of the energy in panel production is used in hot processes, and hence attempts are often made to improve the reuse of waste heat from the different production processes. Waste heat is lost from several part-processes and there is a potential for recovering waste heat from as many processes as possible. This can be done by installing efficient heat exchangers.

Table 19 Energy consumption specified for life cycle phases for plasterboards Source: EPD Norgips Plasterboard 13, figures per m²



O16 Energy requirements for mineral wool panels

The requirement covers the applied energy for production of the panel incl. the production of mineral wool. The requirement may be documented either just for the Nordic Ecolabelled panel production or for the company's total annual production.

In total, no more than 20 MJ/kg mineral panel may be applied for electricity and fuel.

For panels, that do not comply with the requirement for recycled material in O11, applies a maximum level of 10 MJ/kg panel.

The requirement does not include extraction of resources. Self-produced energy and resold surplus energy should be stated, but will not count as applied energy in the calculation. See definition of self-produced energy in section 4.1.

✉ A calculation should be submitted documenting compliance with the requirement. The calculation must contain information about: quantity of produced panels, applied electricity and fuel, and which fuel sources are being used.

Background for the requirement

In the case of panels made of mineral wool, such as fibreglass or stone wool, it is possible to use a high content of recycled material in the panel.

This reduces the energy consumption for raw material production. By doing so, actual panel production will contribute the largest energy impact in the manufacture of mineral wool panels.

Fibreglass: Panel production of fibreglass panels includes the melting of the glass. This process is very energy-intensive and the selection of energy source, heating technology and heat recovery method are central parameters in the design of the furnace. The same choices are also among the most important factors affecting environmental performance and energy efficiency of the melting operation. The three most important energy sources for glass production are natural gas, fuel oil and electricity.

The use of natural gas is increasing in the glass industry for reasons of economy, cleanliness, lightness, control and the absence of requirements for storage facilities. Many large furnaces are equipped for operation with both natural gas and fuel oil. Changing the fuel requires only a simple change to the burners. Some manufacturers exploit this by changing the fuel to use the cheapest source available. It is also common to use electricity as an energy source in combination with fossil fuel.

In fibreglass production, melting often starts in a cold furnace, but with the aid of residual heat from flue gas, the material can be preheated, thus achieving considerable energy savings. This potential energy saving only applies to fossil-fuel fired glass furnaces.

The stone wool industry generally uses furnaces, which are designed to preheat the raw materials.

Stone wool: The commonest melting technology for producing traditional stone wool is a coal-fired hot-blast cupola furnace, which in operation can be compared with a blast furnace for steel production. This technology is used to melt a combination of aluminium silicate stone (normally basalt) and limestone or dolomite and sometimes blast furnace slag. The stone is in solid form to allow the formation of an air-permeable column of material in the furnace, which permits the heat transfer processes which need to be maintained. There are also examples of electric melting and gas-fired furnaces for stone wool production.

A potential has been identified in mineral wool panel production for reducing the energy consumption of panel production.

This could be by process optimisation through control of operating parameters, regular maintenance of the melting furnace, optimisation of furnace design and choice of melting technology, use of combustion control techniques, or use of waste heat in a boiler to exploit the energy, where technically and economically feasible. The extent to which this technology is viable and financially feasible will depend on the overall efficiency achieved, including how effective a use is made of the generated steam.

Data from Ecoinvent database shows 45 MJ/kg for "glass wool mat". The data set represents a production before 1995, but at a high technological level. In the data set, the proportion of recycled glass is 65%. The system boundary in the data set is "cradle to gate" and thus also embraces extraction of raw materials which are not included in this requirement. Thus a requirement level of a maximum of 20 MJ/kg to be ambitious but realistic.

O17 Energy requirements for cement-based panels

The requirement covers the total energy impact from the constituent materials in the panel. The requirement covers all materials used in the panel which are present at more than 1% by weight. To calculate this, table values are applied from Table 20 for each material, weighting them in proportion to the amount of material present in the finished panel.

Requirement for panels: No more than 8 MJ/kg panel may be applied.

The table values express the energy impact of the material with the system limit cradle to gate, e.g. the calorific value. It is not permitted to use privately obtained values.

Nordic Ecolabelling reserves the right to assess which table values are to be used when using materials not specifically laid down in the table or in case of doubt over choice of table value.

Portland cement is defined in accordance with Standard EN 197-1.

Table 20 Table value for energy for material production cradle to gate

Material	Primary energy MJ/kg (both renewable and fossil-based)
Portland Cement	8
Kaolin	5.4
Fly ash (hard coal ash from furnace)	0.4
Limestone flour	0.4
Silicate sand	0.6

Aluminium hydroxide	10
Magnesium oxide	2.7
Magnesium chloride (value for MgO)	2.7
Pozzolanic Filler	83
Residual wood (hardwood u=80% moisture content dry basis)*	5
Residual wood (softwood u=140% moisture content dry basis)	2
Sawdust (chips u=70% moisture content dry basis)*	2
Wood chips (chips u=70% moisture content dry basis)*	1.5
PVA fibre (synthetic fibre)	202
Clay, expanded	4.8
Glass Foam	25.2
Fibreglass	35.2
Polyacrylonitrile (PAN) fibre	82
Other plastic fibres	200

** 70% "moisture content dry basis" means 0.7 m^3 water per 1 m^3 dry wood. This is the same as a moisture content of 41% "moisture content wet basis". In the case of a different moisture content in the wood raw material, a conversion must be made by using an energy figure for dry wood, which would be 2.5 MJ/kg dry substance wood (water content of 0%) for wood chips. A similar conversion must be made for other wood raw materials.*

✉ A calculation should be submitted documenting compliance with the requirement.

Background for the requirement

The requirement is new since cement-based panels are a new panel type in the product group.

The main material in cement-based panels is often cement. There may be up to 80% cement in the panel, but there are also panels with a cement proportion down to around 30-40%. Apart from the cement, renewable fibres such as wood fibre (lignocellulose fibre between 2.5 and 3 mm) are often also included, often in varying amounts depending on panel type (between 3 and 30%). The wood fibres may be either virgin or recycled. Finally water and inorganic fillers such as sand, lime, silicates, kaolin and aluminium hydroxide are used. In certain panels, the wood fibre is replaced by synthetic fibres, such as PVA fibres or fibreglass. Cement production is energy-intensive and also generates high CO_2 emissions. See a further explanation of this at the end of this section.

There are alternative raw materials with a lower energy impact for part of the cement. The panel types with a high content of Portland cement have a high potential for substituting part of the Portland cement with fly ash or other mineral raw materials with a lower energy consumption.

The cement-based panels on the market exhibit a wide variation in material composition. As there is a big difference in energy consumption in the production of the different material types, a potential has been identified for encouraging a material composition with low energy impact. Some of the material variation is justified by differences in the panels' functions and properties, as cement-based panels can be used both indoors and outdoors and also have different positions in the building's facade. The consultation showed a need for a differentiation in relation to facade panels and building panels in this requirement. This is because of the difference in these two panel functions are reflected in the material composition of the cement-based panel.

This differentiation will be reflected with a differentiated requirement level of 10 MJ/kg for facade panels (now in criteria for 114 panels and cladding for exterior use) and 8 MJ/kg of cement-based building panels.

No significant energy relevance has been identified for the actual panel production. Material production contributes the highest energy impact in the panels' life cycle. For this reason it has been decided not to set a requirement for the actual panel production, but instead apply a requirement to the materials as described above.

The energy requirement has been formulated to encourage panels of an overall material composition with a reduced energy and CO_2 impact, as the quantities of constituent materials are weighted by their energy impact (cradle to gate). The energy-intensive materials contribute a high energy impact, and the requirement thus encourages Nordic Ecolabelled cement-based panels to replace their energy-intensive materials with less energy-impacting materials where possible.

This means a reduced content of Portland cement, for example, through the use of some of the cement composites/mixtures in which the proportion of Portland cement has been reduced. Components permitted in the various Portland composite cements are artificial pozzolans (industrial slag, silica fume and fly ash) or natural pozzolans (silicate materials or alumino-silicate materials such as volcanic ash, burnt clay and shale).

At the same time a potential has been identified for reducing the content of synthetic fibres, which are both fossil-fuel based and use a great deal of energy raw materials in their production. A potential has also been identified for using recycled raw materials (recycled fibres) and waste products such as fly ash and industrial slag as materials in the panel. Fly ash may replace part of the cement in the panel.

The cement clinker burning process is responsible for the biggest environmental problems in cement production, both in terms of energy consumption and emissions to air.

The high energy consumption of the clinker burning process is the most significant for the serious environmental problems caused by cement production[36].

The production of 1000 kg basic cement requires 4567 MJ[37], while large quantities of CO_2 are emitted from the process. To produce 1 t clinker, the typical average consumption of raw materials in the EU is 1.52 t. Most of the difference is lost during the process as carbon dioxide emissions to the air from the calcination reaction ($CaCO_3 \rightarrow CaO + CO_2$). The cement thus has a higher CO_2 impact in addition to that due to energy consumption.

Table 17 contains database values for the materials' energy impact cradle to gate, e.g. calorific value. Values have here been taken from PE International Professional 2012 database, EcoInvent Integrated database and from a consultancy report prepared by Force Technology. For wood raw materials, for instance, the calorific value is approx. 10 MJ/kg and as this energy is available in the panel after end-use it is therefore subtracted here. The same has been done for other raw materials with a calorific value.

The cellulose fibres used also contribute to energy impact from material production, depending on how large a proportion of them is present. But if instead of looking at energy, when the total CO_2 impact from the use of cellulose fibre is considered, the picture looks different, as sustainable wood raw materials can be considered a CO_2 uptake. However, when comparing cement and wood fibre, it is also relevant to remember that the burning of lime in cement production emits a good deal of CO_2. Cement has a CO_2

[36] Reference document on best available techniques in the cement, lime and magnesium oxide industries, EU Commission 2010
[37] EPD for Basic Cement from Ålborg Portland

impact of between 0.7 and 0.8 CO_2 equivalents per kg, while wood fibre is renewable and its impact is only around 0.37 CO_2 equivalents per kg[38]. For this reason, relevance has been identified in cement-based panels for other measures for dealing with the CO_2 impact from the materials in addition to the impact correlated with the energy consumption. Hence, the table value has been doubled, as approximately half of the CO_2 impact has been correlated with energy consumption, and similarly, the table values for renewable raw materials have been halved to reflect CO_2 take-up in the cultivation phase.

The table indicates the energy values with the unit MJ/kg material. From these figures it might look as if the wood raw materials are more energy-intensive than, for instance, cement. Here the unit must be borne in mind.

If the table values were instead entered as MJ/m^3, the relationship between the different materials would change due to the materials' different densities. For instance, the density of cement is approx. 1.25 t/m^3 while it is approx. 0.7 t/m^3 for wood chips (in cubic metres). This gives approx. 10,000 MJ/m^3 for cement and approx. 1050 MJ/m^3 for wood chips. These values are again without calorific value and with a CO_2 weighting, as with the values for MJ/kg. However, it has been decided to express the energy impact in MJ/kg in this requirement, as the manufacturers communicate the products' material composition in percent by weight. For example, via an environmental declaration for the construction panel. At the same time, the materials' energy figure is per kg material. Converting to the volume would impart uncertainty to these energy figures due to the variation in density within the material type.

4.3.5 Requirements for chemical products

The requirements cover the chemical products included in the production of the Nordic Swan Ecolabelled panels/mouldings. Either as additives to the panel/moulding or in surface treatments.

The requirement relates to chemical products such as adhesive, additives and surface treatment. Auxiliary chemicals such as lubricating oil for mechanical equipment are not covered by the requirement.

Several of the requirements are aimed at the ingoing substances in the chemical product. See definition of ingoing substance in Section 1.1.

O18 Ecolabelled product

If the product is Nordic Ecolabelled, all requirements in section 4.3.5 except of O24, O25 and O27 are automatically fulfilled.

✉ If the product is Nordic Ecolabelled, the product type and manufacturer and licence number must be specified.

O19 Classification of the chemical product

The chemical product used in the production of the Nordic Swan Ecolabelled panel/moulding must be classified in accordance with the current legislation (CLP Regulation 1272/2008 or the EU's Dangerous Preparations Directive 1999/45/EEC 2008, or later) and may not be classified in accordance with Table 20 below.

Exemptions:
Resins in HPL panels/mouldings with up to max. 10% phenol are exempted from the prohibition of classification with H341/R68 and H301, H331/R23, R24, R25, R48.

[38] Ecoinvent integrated database

Adhesives with methylene diphenyl diisocyanate (MDI) are exempted from the prohibition of classification with H351/R40.

A an exemption for the classification from formaldehyde are given in this requirement. The formaldehyde content in chemical products is instead regulated in requirement O28 and in O32 and O33, which are requirements addressing formaldehyde emission from the panel/moulding. Emissions from HPL production is regulated in requirement O30.

Methanol in concentrations up to 10% by weight in adhesives and resins are exempted from the prohibition of classification according to the requirement.

Resins with melamine are exempted from the prohibition of classification with H351 and H361.

Table 21 List of non-permitted classifications of chemical products in accordance with the CLP Regulation 1272/2008, or later.

CLP Regulation 1272/2008			EU Dangerous Substance Directive 67/548/EC	
Signal words	**Hazard statement**		**Indication of danger**	**Risk phrase**
			Carcinogenic	
Danger, Carc. 1A or 1B	H350		T	R45 and/or
Danger, Carc. 1A or 1B	H350i		T	R49
Warning, Carc. 2	H351		Xn	R40
			Mutagenic	
Danger, Muta. 1A or 1B	H340		T	R46
Warning, Muta. 2	H341		Xn	R68
			Reprotoxic	
Danger, Repr. 1A or 1B	H360		T	R60
Danger, Repr. 1A or 1B	H360		T	R61
Warning, Repr. 2	H361		Xn	R62 and/or
Warning, Repr. 2	H361		Xn	R63
-	H362		-	R33
-	H362		-	R64
			Very toxic	
Danger, Acute Tox. 1 or 2	H330		Tx	R26
Danger, Acute Tox. 1	H310		Tx	R27
Danger, Acute Tox. 2	H300		Tx	R28 and/or
Danger, STOT SE 1	H370		Tx	R39
			Toxic	
Danger, Acute Tox. 2 or 3	H330 or H331		T	R23
Danger, Acute Tox. 3	H331		T	R24
Danger, Acute Tox. 3	H301		T	R25
Danger, STOT SE 1	H370		T	R39 and/or
Danger, STOT RE 1	H372		T	R48

The classification applies in accordance with the EU's Dangerous Substances Directive 67/548/EC with subsequent amendments and adjustments and/or CLP Regulation 1272/2008 with subsequent amendments. During the transition period, i.e. up to 1 June 2015, classification in accordance with the EU's Dangerous Substances Directive or the CLP Regulation may be used. After the transition period, only classification in accordance with the CLP Regulation is allowed.

☒ Declaration from the producer of the chemical product used in the Nordic Ecolabelled product that the requirement has been satisfied. Appendix 7 may be used.

☒ A safety data sheet for the chemical product used in the Nordic Ecolabelled product in accordance with Appendix II of Reach (Regulation 1907/2006/EC with subsequent amendments and additions).

Background for the requirement

The requirement level for classification of the chemical products in the construction panel has not been changed in this revision. However, the requirement has been updated in accordance with CLP, and the text of the requirement has been made clearer. At the same time, the requirement now also covers chemical products in the new panel types in the product group. Here an exemption has been made for specific classifications of adhesives and resins employed in closed systems in HPL production. These classifications are for the uncured product and not the finished HPL panel. HPL production is based on the use of resins with phenol and formaldehyde for impregnating the paper. It is therefore impossible to produce HPL without these resins.

However, for working environment reasons, it is important to ensure that the resins do not contribute to emissions which damage health. Requirement O30 has been set down in order to ensure this.

Formaldehyde

There is in this requirement introduced an exception for formaldehyde in adhesives and resins, which is predominantly used for wood-based panels and HPL panels. The formaldehyde content in adhesives is instead regulated requirements O28. To ensure that these adhesives does not contribute with problematic formaldehyde emission levels during the use stage, tough emission requirements for the finished panel are developed at the same time.

The consultation commented on the future up classification of formaldehyde (CLP Adaptation to Technical Progress - ATP no. 6, EU Regulation 605/2014), and that this needed to be handled in this requirement. The up classification means that chemical products containing formaldehyde will require labeling with the following hazard classes and H-statements in relation to the concentration of formaldehyde in the product:

Table 22 New classification of formaldehyde (CLP ATP 6)

Formaldehyde konc. in the chemical product	Signal words and hazard statement
=>0.1%	Carc. 1B/H350
=>1%	Muta. 2/H341
=>25%	Acute Tox. 3/H301
=>25%	Acute Tox. 3/H311
=>25%	Acute Tox. 3/H331
=>25%	Skin Corr. 1B/H314
=>0.2%	Skin Sens. 1/H317

Up to CLP ATP 6 comes into force, the exception of formaldehyde with H351 (Carc 2) /R40 and H341/R68 will apply. From 04/01/2015 formaldehyde with classification H350 (Carc.1B)/R45 and/or R49 and H341 (Muta.2)/R68 are exempted the requirement.

The most frequently used formaldehyde based adhesives used for wood-based panels, has a content of 0.1-2% formaldehyde. With tough emissions requirement to the panels, it will be ensured, that emissions from the finished panel is minimal. For all panel types, except HPL, the formaldehyde content in adhesives is regulated in requirement O28 where a maximum limit of 0.2% by weight (2000 ppm). For adhesives mixed with a hardener the limit of 0.2% by weight (2000 ppm) free formaldehyde in the final mix. A content of 0.2% formaldehyde require an exception for classification with Carc. 1B, H350. For HPL panels emission requirements are set for both the production (O30) and the use stage (0).

Nordic Ecolabelling wishes to encourage the development of wood based panels with low formaldehyde emission. Since the main issue is still formaldehyde emissions in the use stage, the criteria focuses on making tough requirements on formaldehyde emissions from the finished panel.

Phenol in resin
Resins for HPL production can contain higher concentrations of both phenol, methanol and formaldehyde. These substances are necessary for hardening of the HPL panel. Requirement O33 to emissions of formaldehyde and VOC ensures, that emissions from the finished panel is minimal. Phenol (CAS: 108-95-2) is classified Muta. 2 H341 and H373; H301/311/314/331. The classification Muta. 2 H341 is activated by ≥ 1% by weight in the product. Phenol can enter up to 10% by weight in resins for HPL production and thereby activate classification with Muta. 2 H341 (Muta. Cat. 3; R68). For HPL panels is therefore required an exemption for resins with phenol.

Methylen diphenyl diisocyanat (MDI)
In the consultation a new requirement, prohibiting isocyanates with chain length below 10, were proposed. The consultation gave many comments to this. It was stated that especially methylene diphenyl diisocyanate (MDI) was necessary to use and that it is not possible to use isocyanates with chain length under 10.

Adhesives for wood-based panels often use methylene diphenyl diisocyanate (MDI) but also Toluene 2,4- diisocyanate (TDI). TDI are more volatile than MDI, which gives a greater risk of exposure.

Additionally TDI exhibit greater toxicity by inhalation and is in addition to R40/H351 classified as environmentally hazardous (R52/53: Harmful to aquatic organisms, can cause long- term adverse with long lasting effects)[39]. MDI is not classified as an environmental hazard. The memorandum "Strategy for risk management of certain isocyanates (MDI and TDI) from the Environmental Protection Agency in Denmark from 2014 indicates substitution of volatile TDI with the less volatile MDI as an alternative.

There is located a need for an exception to the prohibition of classification with H351/ R40 since this classification is activated by a concentration limit of ≥1% by weight MDI. Use of adhesives with MDI exceeds this concentration limit.

The exemption only covers Methylene diphenyl diisocyanate (MDI) and the following related compounds; CAS no. 101-68-8, 5873-54-1, 2536-05-2, 26447-40-5, 9016-87-9, 17589-24-1, 31107-36-5, and 25686-28-6[40].

MDI reacts by hardening of the panel and do not emit from the panel in the use stage. In panel productions, using isocyanates, there is focus on health in relation to the use of MDI.

Methanol
There is located a need for an exemption for methanol as formaldehyde-based adhesives often contain methanol as a stabilizer. Formaldehyde is unstable in a water solution and the solution therefore contains a stabilizer, which reduces the tendency for polymerization.

[39] Strategy for risk management of certain isocyanates (MDI and TDI), Miljøstyrelsen 2014
[40] http://www.epa.gov/oppt/existingchemicals/pubs/actionplans/mdi.html

The solution can be stabilized by the addition of 10-15% methanol. Adhesives with methanol will need except for the following classifications in requirement O19: H351, H301, H331 and H370.

Melamine
On 28 June 2022 Nordic Ecolabelling decided to make an exemption for the classification prohibitions H351 and H361 for resins with melamine. The exemption is made since melamine has started to be self-classified as H361 (Repr. 2) by several suppliers. In the end of 2020 the Committee for Risk Assessment (RAC) at ECHA also decided that melamine should get the harmonized classifications H351 (Carc. 2) and H373 (STOT RE 2). These harmonized classifications are obligatory from 23 November 2023. The classification H361 will not be a harmonized classification, but it could be producers who uses this self-classification in addition to the harmonized classifications. Nordic Ecolabelling gives exemptions both for the self-classification and the new harmonized classifications since there are today no chemical substance that could substitute melamine.

Nordic Ecolabelling seeks to ensure that the health and environmental impact of the products is as low as possible. Therefore, requirements are made for the prohibition of specific classifications of the products. The RPS analysis in Section 2.2 found generally high RPS for strict chemical requirements for this product group.

O20 CMR classification of constituent substances

The requirement covers all constituent substances in the chemical products used in production of the panel/moulding and for surface treatment.

The constituent substances used in chemical products in panel/moulding production (e.g. additives, adhesives and surface treatment) must not have any classifications listed in Table 23 below.

Exemptions:
From 04/01/2015 formaldehyde is up classified under CLP ATP 6 (EU no. 605/2014) then an exemption for formaldehyde with H350 (Carc.1B)/R45 and/or R49 and H341 (Muta.2)/R68 are given in this requirement. The formaldehyde content in adhesives is instead regulated in requirement O28 and O32 and O33, which are requirements addressing formaldehyde emission from the panel. Emissions from HPL production is regulated in requirement O30.

Table 23 List of non-permitted classifications of constituent substances in chemical products

CLP Regulation 1272/2008:			EU Dangerous Substance Directive 67/548/EC:	
Signal words	**Hazard statement**		**Indication of danger**	**Risk phrase**
			Carcinogenic	
Danger, Carc. 1A or 1B	H350		T	R45 and/or
Danger, Carc. 1A or 1B	H350i		T	R49
			Mutagenic	
Danger, Muta. 1A or 1B	H340		T	R46
			Reprotoxic	
Danger, Repr. 1A or 1B	H360		T	R60
Danger, Repr. 1A or 1B	H360		T	R61

The classification applies in accordance with the EU's Dangerous Substances Directive 67/548/EC with subsequent amendments and adjustments and/or CLP Regulation 1272/2008 with subsequent amendments. During the transition period, i.e. up to 1 June 2015, classification in accordance with the EU's Dangerous

Substances Directive or the CLP Regulation may be used. After the transition period, only classification in accordance with the CLP Regulation is allowed.

✉ Declaration from the producer/supplier of the chemical product that the requirement has been satisfied. Appendix 7 may be used.

Background for the requirement

The prohibition on CMR substances in categories 1A and 1B has been given its own requirement in this version of the criteria. At the same time the requirement has been updated to match CLP Regulations 1272/2008.

Nordic Ecolabelling seeks to ensure that the health and environmental impact of the products is as low as possible. Hence requirements have been laid down prohibiting specific CMR classifications, thereby excluding some of the most problematic classifications of substances from a health point of view. Nordic Ecolabelling has prepared an Environmental Toxins Policy[41], in which CMR substances are one of the focus areas.

For the exception of formaldehyde see the background description to requirement O19.

The RPS analysis in Section 2.2 found generally high RPS for strict chemical requirements for this product group.

O21 Specific excluded substances in chemical products

The requirement covers all constituent substances in the chemical products used.

The following substances must not be present in the chemical product:

- Substances on the EU Candidate List*

  Exemption applies to: melamine (CAS nr. 108-78-1)
- Persistent, bioaccumulative and toxic (PBT) organic substances**
- Very persistent and very bioaccumulative (vPvB) organic substances**
- Substances regarded as potentially endocrine-disrupting in category 1 or 2 on the EU
- Priority List of substances for further investigation for endocrine disrupting
- Effects***
- Halogenated organic compounds, such as organic chloroparaffins, fluorine compounds and halogenated flame inhibitors****
- Bisphenol A
- Alkylphenols, alkylphenol ethoxylates and other alkylphenol derivates
- Phthalates
- Aziridine and polyaziridines
- Pigments and additives based on lead, tin, cadmium, chromium VI and mercury, and their compounds

** Candidate List pursuant to REACH, 1907/2006/EC Article 59, Par. 10 is available on the ECHA website: http://echa.europa.eu/sv/candidate-list-table*

*** PBT and vPvB substances are defined in Annex XIII of the Reach Regulation (Regulation 1907/2006/EG). Substances which meet the PBT or vPvB criteria or which liberate substances which meet these criteria are listed on http://esis.jrc.ec.europa.eu/index.php?PGM=pbt. Substances which have been "deferred" or are "under evaluation" are not deemed to possess PBT or vPvB properties.*

[41] NM Hedstein, 2007

**** Se following link: http://ec.europa.eu/environment/chemicals/endocrine/pdf/final_report_2007.pdf (Annex L, page 238 ff.)*

***** The biocide bronopol Cas. Nr. 52-51-7 is exempted from this requirement up to 0,05% by weight. The biocide CMIT, in combination with MIT, is an exemption from this rule and is regulated by Requirement O22.*

☒ Declaration from the raw materials producer or supplier showing that the requirement has been complied with. Appendix 7 may be used.

Background for the requirement

The requirement has now been clearly limited to cover only the chemical products used for the production of construction panels. The requirement has been extended to include isocyanates (apart from one exemption), Candidate List substances, potential endocrine disruptors in Category 1 or 2 on the EU Priority List and PBTand vPvBsubstances. See the reasons for this below. In addition there are now separate specific requirements for classification of the constituent substances, VOC and preservatives in the chemical products. For this, see Requirements O20, O26 and O22.

Candidate List substances

The requirement has been extended with a prohibition on the use of Candidate List substances in the chemical mixture. REACH, Article 57, defines the criteria used for assessing substances as Substances of Very High Concern (SVHC).

These substances may be added to the Candidate List. There is no list of SVHC substances – only a set of criteria for assessing substances as SVHC. The mere addition of a substance to the Candidate List does not, in itself have any regulatory consequence, but it indicates that the substance can be considered for inclusion on the Authorisation List (see below).

The Candidate List is published pursuant to REACH Article 59 on the Chemicals Agency (ECHA) website. The link to the list is here: http://echa.europa.eu/sv/candidate-list-table Several of the Candidate List substances will also be covered by other requirements for the chemical products. The requirement is a way of taking account of REACH and the communications mode for substances in REACH.

PBT substances

PBT substances and vPvB substances are substances with innate properties which are undesirable in Nordic Ecolabelled construction panels.

PBT (persistent, bioaccumulative and toxic) substances are defined in REACH Regulations Annex XIII as:

P: half-life in sea water is over 60 days or half-life in fresh or estuarine water is over 40 days or half-life in marine sediment is over 180 days or half-life in fresh or estuarine sediment is over 120 days or half-life in soil is over 120 days

B: bioconcentration factor (BCF) is over 2000

T: the concentration without observed effect over a long period (long term NOEC) for marine or fresh-water organisms is under 0.01 mg/l, or

CM (category 1 or 2 pursuant to 67/548/EEC or category 1A or 1B pursuant to the CLP Regulation) or R (category 1, 2 or 3 pursuant to 67/548/EEC, or 1A, 1B or 2 pursuant to the CLP Regulation), or other documentation for chronic toxicity as identified by classifications T, R48 or Xn, R48 (67/548/EEC).

vPvB substances
vPvB (very persistent, very bioaccumulative) substances are defined in REACH

Regulations Annex XIII as:

vP: half-life in sea water, fresh water or estuarine water is over 60 days, or half-life in marine sediment, fresh water sediment or estuarine sediment is over 180 days, or half-life in soil is over 180 days vB: bioconcentration factor (BCF) is over 5000

Endocrine disrupting substances
Human exposure to endocrine disrupting substances is a ground for special concern. This is because the exposure to endocrine disrupting substances at important stages of development can cause irreversible damage to the foetus and lead to serious health effects later in life, and because the consequences for the complex endocrine system of the long-term impact of endocrine disrupting substances are by and large unknown.

Endocrine disruptors are a problem in several ways. Firstly, there is no classification for endocrine disrupting substances as such, so the Nordic Ecolabel must refer to more or less official lists of substances that are suspected or proven endocrine disruptors. This unofficial status makes it difficult to give references when formulating the requirements. In addition, endocrine disruptors have proved to have a "cocktail effect", which means that the effect of several substances may exceed the sum of the parts. It is thus very important to consider the volume and triviality limit in this context. The requirement refers to the EU's priority list of substances for further investigation of endocrine disrupting effects in category 1 or 2*.

The list can be found here:
http://ec.europa.eu/environment/endocrine/documents/final_report_2007.pdf
(Appendix L, side 238-)

Halogenated compounds
The requirement contains an exemption for the biocide CMIT in combination with MIT. These are instead regulated in Requirement O22.

In version 6.0 Nordic Ecolabelling became aware that the primarily used biocide for water-based paints and adhesives used in these product types, contains the preservative bronopol. Bronopol concentration in the paint or glue is very low - often below 0.05%. At present, no better biocide alternative is available on the market. Since the content of bronopol is very low, it has been decided to allow up to 0.05% bronopol as a preservative in chemical products used in the production.

Halogenated compounds is a broad term for various problematic substance groups, as described below.

Halogenated organic solvents include many substances that are hazardous to the environment and health and are very toxic for aquatic organisms, carcinogenic or hazardous to health in other ways.

Halogenated organic compounds have low degradability in the environment, which also increases the risk of harmful effects from the substances. Organic compounds, which contain halogenated compounds such as chlorine, bromine, fluorine or iodine must not be

included in chemical products used for production of Nordic Swan Ecolabelled construction panels.

Perfluorinated and polyfluorinated alkylated substances (PFAS). Perfluorinated substances are also called perfluoroalkyl surfactants or perfluoroallyl acids and are included in the category "halogenated compounds". (PFAS) is a designation for a group of chemical compounds which contain a completely fluorinated alkyl chain and a group which gives the compound a certain solubility in water. This group of compounds is fundamentally different from most other chemicals as it is neither lipophilic (fat-loving) nor hydrophilic (water-loving), but binds easily with particle surfaces. The compounds are mainly used for their good surface properties and water and fat repellent qualities. They are used in various industrial and consumer products, in which properties such as low surface energy, high chemical and thermal stability, low light refractive index, high electrical insulating power and good resistance to corrosion and external stresses are important. Important product types include floor wax and polish, paint and lacquer, degreasing and cleaning agents, impregnating agents for textiles and leather and fire extinguishants.

Perfluoroalkyl substances are highly persistent (stable) and slow to degrade. As mentioned above, the compounds have very low water and fat solubility, and accumulation takes place by binding to the surfaces of particles or fabric.

They bind to proteins and can be detected in high concentrations in top predators. A Nordic screening study showed PFAS compounds in all examined sample types, with the highest levels in marine mammals. The report concludes that PFAS is present in significant concentrations in the Nordic environment. The highest focus is on the PFAS compound perfluorooctyl sulphonate (PFOS), which is toxic to aquatic organisms, birds and bees. /ref: SFT: 927/2005/.

Bisphenol A
Bisphenol A is a monomer in polycarbonate plastic (PC) and in epoxy resin. Bisphenol A ends up in products such as feeding bottles, drinking flasks, food tins and plastic pipes for the construction industry.

Bisphenol A (cas-no. 80-05-7) is classified Repr. 2 with H361f, STOT SE 3 with H335, Eye Dam. 1 with H318 and Skin Sens. 1 with H317. Bisphenol A is on the Danish Effect List and List Of Undesirable Substances and on the EU list of substances for further investigation of endocrine disrupting properties.

Some of the epoxy resins which may contain Bisphenol A are Epichlorohydrin, which gives Bisphenol-A-(epichlorohydrin)epoxy resin (cas-no. 25068-38-6), which is classified Eye Irrit. 2 with H319, Skin Irrit. 2 with H315, Skin Sens. 1 with H317 and Aquatic Chronic 2 with H411. Bisphenol-A-(epichlorohydrin)epoxy resin must be regarded as excluded if Bisphenol A is excluded as a constituent substance, as Bisphenol A is part of the resin.

APEO og APD (alkylphenol ethoxylates og alkylphenol derivates)
APEO is excluded because its degradation products are not easily degradable and some degradation products are on the EU list of substances for further investigation for endocrine-disrupting effects (e.g. nonylphenol) Alkylphenol derivates (APD) are substances derived from APEO and are excluded because they are harmful to health or not easily degradable.

APEO and APD are on the Danish List Of Undesirable Substances and the reason for this is: "Nonylphenol, octylphenol and nonylphenol ethoxylate are on the EU Priority List of substances for further investigation for endocrine-disrupting properties. Some octylphenol compounds have problematic properties according to the Danish Advisory List for Self-Classification: N; R50/53 and one compound also has R43. Use of the substances has only been partially restricted, but other uses too are regarded as of environmental concern". In addition, octylphenol ethoxylates and nonylphenol ethoxylates are on the Candidate List, due to their serious effects on the environment. See more about the Candidate List later in this chapter or under the REACH Regulation in Chapter 2 of the Legislation Module. The restrictions on use for nonylphenol ethoxylates are regulated via REACH Annex XVII. The reason why Nordic Ecolabelling still chooses to retain APEO and APD on the negative list is that alkyls relate to more than just octyl and nonyl compounds, and as a precaution it has been decided to exclude these related compounds as well, despite their not being identified as problematic substances.

Phthalates

Phthalates are mainly used as softeners for PVC, but can also be used as stabilisers, film formers, emulsifiers, lubricants, binders and many other functions, in which they end up occurring in numerous products such as adhesives, personal care products (e.g. denaturing products for perfume spirit), toys, packaging and much more.

Many phthalate compounds have undesirable health and environmental impacts. A number of phthalates are on the EU's Priority List of substances for further investigation of endocrine-disrupting effects - and a number are already been shown to have endocrine-disrupting effects. Phthalates also receive a good deal of attention in the media and may therefore be undesirable in ecolabelled products for many reasons. Some phthalates are on the Danish List Of Undesirable Substances. These are diethyl hexyl phthalate (DEHP), dibutyl phthalate (DBP), benzyl butyl phthalate (BBP), dimethoxyethyl phthalate (DMEP) and diisobutyl phthalate (DIBP) with the following justification: "All five phthalates have problematic properties according to the List of Harmonised Classification (CLP list). In addition, DEHP, DBP and BBP are on the EU Priority List of substances for further investigation for endocrine-disrupting properties.

Some phthalate compounds are also on the Candidate List. These are: DEHP (bis-(2-ethyl hexyl)phthalate), DBP (dibutyl phthalate), BBP (benzyl butyl phthalate), DiBP (diisobutyl phthalate), DPP (dipentyl phthalate), PiPP (pentaisophenyl phthalate), DiPP (diisopentyl phthalate), N-pentyl-isopentyl phthalate and bis(2-methoxyethyl) phthalate. All are included because of their classification as reprotoxic.

Restrictions on use of DEHP, DBP and BBP, DINP (diisononyl phthalate), DIDP (diiso-decyl phthalate) and DNOP (di-n-octyl phthalate) are regulated by REACH Annex XVII.

Aziridine and polyazidirines

Aziridine is classified as a carcinogen in group Carc 1B with H350 and a mutagen with Mut 1B with H340. In addition it is classified as "Very Toxic", "Corrosive", "Extremely flammable" and "Harmful to the Environment"[42].

Heavy metals

Heavy metals are environmentally harmful, so their discharge must be limited as far as

[42] http://esis.jrc.ec.europa.eu/index.php?PGM=cla

possible. It is relevant to ensure that raw materials used in the product group do not contain the heavy metals chromium, nickel, lead, cadmium or zinc (surface treatment only).

Chromium
Chromium (III) and chromium (VI) are used for e.g. chrome plating, in colours and in pigments. Chromium (III) is essential, since living organisms require chromium. The different types of chromium have different effects. All chromium compounds are toxic. Chromium (VI) has particularly harmful effects, as it is carcinogenic and allergenic. A number of chromate compounds are on the Danish Environmental Protection Agency's list of undesirable substances. It is therefore still relevant to include a ban on chromium in the criteria.

Nickel
Nickel is one of the commonest reasons for contact allergy in Denmark. However, cases have declined since new rules were introduced in 1991 for a large number of consumer products that are intended for direct and prolonged contact with the skin. The rules apply to e.g. jewellery, spectacles, buttons and belts, while mobile phones and laptop computers must also comply with the nickel requirements. Yet the rules do not protect all consumers, since some people are more sensitive. Even though metal elements comply with the rules, this is not sufficient to prevent particularly sensitive people from developing nickel allergy.

Mercury
Mercury occurs as inorganic and organic chemical compounds, and is one of the most dangerous environmental toxins. Mercury is a threat to the environment and to human health. Organic mercury compounds are particularly toxic. Mercury compounds are extremely toxic for aquatic organisms and for mammals. Mercury, even in small quantities, can cause three chronic toxic effects. Mercury can also cause kidney damage, foetal damage and lead to contact allergy.

Lead
Lead is a toxic heavy metal that is accumulated in nature and in human beings. This means that even small quantities of lead can be hazardous to health. Children are particularly vulnerable.

They are generally exposed to more lead than adults via food, soil and dust, while their gastrointestinal system absorbs lead far more effectively than adults. Lead affects the nervous system. As children's nervous system is still developing, they are particularly sensitive to these effects and American studies have shown that, even in small quantities, lead can affect children's learning ability and intelligence. Lead is also toxic for organisms in soil and water. If products containing lead are disposed of as waste, after incineration the lead will be present in slag and fly ash. A smaller element is dispersed in smoke and dust from incineration plants.

Zinc
Zinc is an essential metal, since living organisms require zinc. In excessive quantities zinc can be toxic for organisms in the environment and can cause stomach cramps and vomiting, and anaemia after prolonged ingestion. It can also affect rats' ability to reproduce, but it is not known whether it also has this effect on human beings. Zinc is a finite resource with a supply horizon of 20 years.

Cadmium
Cadmium and cadmium compounds are acutely and chronically toxic for human beings

and animals. Most cadmium compounds are also carcinogenic. Cadmium is classified as very toxic on aspiration and as carcinogenic. Cadmium can also potentially be reprotoxic and cause foetal damage. Most cadmium compounds are extremely toxic for aquatic organisms, especially in fresh water, and acutely toxic for mammals. Cadmium also has chronic toxic effects on many organisms, even in very small concentrations. Cadmium is bioaccumulative in fish and mammals and has a long biological half-life in mammals.

O22 Biocides (preservatives and antibacterial treatment)

Antibacterial treatment (all types of panel and mouldings)

- No biocides or biocide products may be applied to the surface of the finished panel/moulding, or to parts of these, for the purpose of providing a disinfectant or antibacterial effect.

Preservatives in chemical products (all types of panel/mouldings)

- The total content of Kathon mixture (CMIT/MIT) 5-chloro-2-methyl-2H-isothiazolin-3-one (CAS no.: 26172-55-4) and 2-methyl-2H-isothiazolin-3-one (CAS no.: 2682-20-4) (3:1) in the chemical product may not exceed 15 ppm (0.0015% by weight, 15 mg/kg).

All types of panels/mouldings:

- The total content of isothiazolinone compounds in the chemical product may not exceed 500 ppm (0.05% by weight, 500 mg/kg).
- The total content of 2-Methyl-3(2H)-isotiazolon in the chemical product may not exceed 200 ppm.

✉ Declaration from producer/supplier of all constituent chemical products, showing that the requirement has been met. Appendix 7 may be used.

Background for the requirement

The requirement for preservatives in chemical products has been formulated as a separate requirement in this version. The requirement has now been differentiated by a concentration limit for all isothiazolinone compounds, depending on whether the chemical products are used for surface treatment of facade panels or not.

These two levels harmonise with the requirement levels in the Nordic Swan Ecolabelling criteria for chemical building products, in which industrial paint and lacquer have a level of 500 ppm and outdoor paint and lacquer have a level of 1500 ppm.

At the same time the requirement has been tightened in relation to the concentration limit for the CMIT/MIT mixture of 5-chloro-2-methyl-2H-isothiazolin-3-one (CAS no.: 26172-55-4) and 2-methyl-2H-isothiazolin-3-one (CAS no.: 2682-20-4) (3:1). The requirement has also been tightened to include a general prohibition on bioaccumulative preservatives.

In addition, preservatives must meet the general classification requirements in the criteria and other relevant requirements. With these restrictions and with the requirements in the Biocide Directive (98/8/EC), there are few preservatives that comply with both legislation and the Nordic Ecolabel requirements.

Preservatives are an ingredient whose purpose is to kill undesirable organisms in products and consequently they are often more or less harmful to the environment.

On the other hand, preservatives are often a necessity for ensuring satisfactory service life in the products, and they are used in small quantities. As an extra twist to the evaluation, the fact remains that many preservatives can affect health. So, there are many aspects to be taken into consideration when choosing requirements for preservatives.

Isothiazolinones and the mixture (3:1) CMIT/MIT
Isothiazolinones may occur as preservatives in the raw materials used in the chemical products. It is difficult to avoid isothiazolinones completely without substituting other problematic substances, so a limit value has been set for the content of the chemical products used in the chemical mixture. Preservatives may be either in-can or film preservatives.

Previously there was a prohibition on dimethyl fumarate in the criteria. Dimethyl fumarate (DMF) is a mould and fungus killing agent often used to protect furniture or shoes etc. during long transport from countries such as China. Since 2009, it has been forbidden to import and sell goods containing over 0.1 mg DMF/kg, or in which DMG has been declared in the EU. The agent has been found in leather and synthetic leather products such as upholstered furniture, shoes and riding helmets, but is not particularly relevant for construction panels[43]. It is therefore assessed that the requirement is not relevant for construction panels.

Methylisothiazolinon (MI)
In the consultation came comments on the relevance in regulation of the use of methyl-isothiazolinone (MI). This is argued with studies which show an increasing sensitivity for precisely MI, that EU Scientific Comittee (SCCS) has reclassified MI to a strong allergen and that reports indicate that MI has a potential airborne spread which can cause contact allergy.

In developing the criteria of Nordic Ecolabelling of flooring has introduced an individual limit for MI (2- methyl -3 (2H) -isotiazolon) in preparations. The same limitation of a maximum of 200 ppm MI is inserted into these criteria after the hearing.

After the consultation, the prohibition of bioaccumulative substances has been removed from this requirement because the prohibition simultaneously is placed under requirements O21 Specific excluded substances in chemical products. Requirements O21 describes among other things, that the preparation should not contain organic substances which are persistent, bioaccumulative and toxic (PBT) and organic substances which are very persistent and very bioaccumulative (vPvB).

O23 Nanoparticles

The product may not contain nanoparticles (from nanomaterial*)

Exemptions from the requirement are granted for the following:

- Pigment**
- Synthetic amorphous silicate***
- Naturally occurring inorganic fillers****
- Polymer dispersions

** The definition of nanomaterials follows the EU Commission's definition of nanomaterials of 18 October 2011:*

"Nanomaterials": a natural, incidental or manufactured material containing particles in an unbound state or as an aggregate or an agglomerate and where at least 50% of the particles in the size distribution by number, in one or more external dimensions, are in the size range of 1-100 nm.

*** Nano titanium dioxide is not considered to be a pigment and is therefore a subject to the requirement.*

**** This applies to conventional synthetic amorphous silicate. Chemically modified colloidal silica can be included as long as the silica particles form aggregates in the finished product. Any surface treatment must meet the chemical requirements of the criteria.*

[43] http://mst.dk/virksomhed-myndighed/kemikalier/regulering-og-regler/faktaark-om-kemikaliereglerne/dmf/

***** This applies to fillers covered by Annex V Point 7 of REACH.*

☒ Declaration from producer/supplier of chemical product (except for polymer emulsion, pigment and synthetic amorphous silicate) that the product does not contain nanomaterial as defined by the requirement. Appendix 7 may be used.

Background for the requirement

The requirement has been reworded in this version of the criteria and it is specified that polymer emulsions are not considered to be nanomaterial, or in the case of an exemption from the requirement.

There is still great uncertainty as to how nanoparticles affect health and the environment[44]. Based on the precautionary principle, Nordic Ecolabelling wishes to take a restrictive attitude to the use of nanoparticles in Nordic Ecolabelled products.

Nanometals include nanosilver, nanogold and nanocopper. Nanometals such as nanosilver and nanocopper are a special problem, as they are present in many products for their antibacterial effect. Substances such as nanosilver are regarded by the US Environmental Protection Agency (EPA) as a biocide. There is a specific concern that discharge of nanosilver to run-off water or other dispersion may eliminate desirable bacteria and cause resistance in some bacteria. In this product group there are examples of nanomaterials being used for surface coatings of construction panels, etc. It is therefore relevant to lay down the requirement for the product group. A general ban on nanoparticles is not controllable enough, as there are also materials of less than 100 nm which are not regarded as problematic. Hence, the requirement contains the following limitation:

Polymer emulsions are not regarded as a nanomaterial and an exemption from the requirement is granted for the following:

- Pigment
- Synthetic amorphous silicate
- Naturally occurring inorganic fillers

Since the amorphous silica is a nano material, according to the EU Commission's definition, an exception is given for synthetic amorphous silica in this requirement. Surface modified colloidal silica may be included.

The requirement may be documented by such means as a description of how nanoparticles are bound to the product and thus not released to the environment (both during and after use) or the user (both during and after use).

This requirement means that more recent nanomaterials, which intentionally contain nanoparticles, cannot be included. Examples of such nanoparticles are fullerenes, carbon nanotubes, nanosilver, nanogold and nanocopper. However, traditional fillers may be included. Pigment is exempted from the requirement, i.e. TiO_2 may be included in pigment form.

Stating the particle size of inorganic fillers from the raw material suppliers may be a problem. Naturally occurring inorganic fillers such as chalk, marble and lime are exempted from registration in accordance with ANNEX V, § 7 of REACH, see below, as long as these fillers have only been physically treated (ground, screened etc.) and not chemically

[44] European Council, Recommendation 2017 (2013), Provisional version, Nanotechnology: balancing benefits and risks to public health and the environment

modified. They are also exempted from registration with the Danish Environmental Protection Agency in accordance with the Statutory Order for the register of mixtures and items containing nanomaterials and producers' and importers' notification duty to the register.

In the EU Commission's Follow-up Report on the second "Regulatory Review on Nanomaterials" of 2012[45], it is stated that solid nanomaterials dispersed in a liquid phase (colloid) must be regarded as nanomaterials in accordance with the EU Commission's recommendation. On the other hand, nanoemulsions are not covered by the definition. Polymers/monomers may occur in different phases and sizes, and so it has been decided to explicitly state that polymers are exempted from this nano requirement.

Nordic Ecolabelling does not require a test for all raw materials in relation to nanoparticles. Polymer emulsions, pigments, dyes, natural minerals and metals (with the exemptions in the requirement text) are not covered by the nano requirement. The requirement is based on the EU definition of nanoparticles. Here there is also a requirement that raw materials covered by the EU definition of nanoparticles state this on the product datasheet, making this knowledge available to the chemical producer.

The requirement stipulates a declaration from the supplier of chemical products not covered by the exemption. The declaration must state that the chemical product does not contain nanomaterials as defined by the requirement. The declaration is made to the best of the signatory's knowledge and according to the knowledge held at the time, based on tests and/or declarations from raw materials producers/suppliers. Reservation is made for new developments and knowledge. If such new knowledge should come to light, the signatory is obliged to submit an updated declaration to Nordic Ecolabelling.

Apart from the exempted raw materials described above, there will also be raw materials which are not defined as particles, agglomerates or aggregates and which are thus not covered by the requirement.

Page 40 Par. 4 of the COMMISSION'S RECOMMENDATION of 18 October 2011 on the definition of nanomaterials (2011/696/EU) states the following:

"With regard to Par. 2, "particle", "agglomerate" and "aggregate" are defined as follows:

a) "particle": a very small piece of material with well-defined physical boundaries.

b) "agglomerate": a collection of loosely bound particles or aggregates in which the area of the resulting external surface corresponds to the sum of the surface area of the individual components.

c) "aggregate": a particle consisting of closely bound or fused particles.

O24 Environmentally harmful substances in the panel/moulding (not surface treatment)

The total quantity of added chemical substances in the panel/moulding which are classified as environmentally harmful according to Table 24 has been restricted and must comply with a required level of maximum 2% by weight environmentally harmful substances by means of the following formula:

[45] Communication from the Commission to the European Parliament, the Council and the European Economic and Social Committee, Second Regulatory Review on Nanomaterials, COM(2012) 572 final

100*H410 + 10*H411 + H412 ≤ 2% by weight environmentally harmful substances

or

100*(R50/53) + 10*(R51/53) + (R52/53) ≤ 2% by weight environmentally harmful substances

where:
H410 is the total concentration of substances classified as H410 (and the same for R50/53) as a percentage of the panel/moulding

H411 is the total concentration of substances classified as H411 (and the same for R50/53) as a percentage of the panel/moulding

H412 is the total concentration of substances classified as H412 (and the same for R50/53) as a percentage of the panel/moulding

The requirement relates to the chemical products used in the panel/moulding (e.g. adhesives) with the chemical composition they have when mixed in the panel/moulding material.

The following exemptions apply:

- Ammonia in a concentration of over 24% is exempted and not counted here.
- Phenol (CAS: 108-95-2) classified H411 in resins in HPL panels/moulding with up to a maximum of 10% by weight of phenol is excluded from the calculation. Note that there are requirements for emission of phenol in O30.
- Acrylates in UV-curing products are exempted from the calculation if the products are used in a controlled closed process where no discharge to recipient takes place. Spills and residual waste (e.g. residues from cleaning) must be collected in containers that are approved for hazardous waste and handled by a waste contractor.

Table 24 Environmental hazard statements and risk phrases covered by the requirement

Hazard class	Hazard code and hazard statement according to CLP Regulation 1272/2008	Indication of danger and R-phrase according to EU Dangerous Substances Directive (67/548/EC)
Hazardous to aquatic life	Chronic 1 with H410	N; R50-53
	Chronic 2 with H411	N; R51-53
	Chronic 3 with H412	R52-53

☒ Declaration from producer/supplier of chemical product showing the content of environmental hazard classified substances covered by the requirement, stated specifically for each indication of danger/R phrase. Appendix 8 may be used.

☒ Calculation from panel manufacturer showing the panel's content of environmentally hazardous substances in relation to the requirement. Here information from Appendix 8 should be used.

☒ For UV-curing products: a description of the process and how waste and residual waste are handled, including information on who receives the residual waste.

O25 Environmentally harmful substances in surface treatment

Chemical products used in the surface treatment system (e.g. coating, oil, paint and lacquer) of the panel/moulding must satisfy one of the two following requirement alternatives.

a) No chemical product in the surface treatment may be classified as environmentally harmful according to Table 25 below.

or

b) The total amount of environmentally harmful substances applied (indicated in Table 25) in the surface treatment system must not amount to more than 40 g/m² calculated in wet condition.

Acrylates in UV-curing surface treatment products are exempted from a) and b) if the following is fulfilled:

UV curing surface treatment products must be applied to the material during a controlled closed process where no discharge to recipient takes place. Spills and residual waste (e.g. residues from cleaning) must be collected in containers that are approved for hazardous waste and handled by a waste contractor.

For alternative b) one of the following formulae must be used to calculate the weight percentage of constituent environmentally harmful substances in the surface treatment system (to be done as a total for all chemical product in the surface treatment):

100*H410 + 10*H411 + H412 = percent by weight environmentally harmful substances
or
100*(R50/53) + 10*(R51/53) + (R52/53) = percent by weight environmentally harmful substances

H410 is the concentration of substances classified as H410 (and the same for R50/53) as a percentage
H411 is the concentration of substances classified as H411 (and the same for R50/53) as a percentage
H412 is the concentration of substances classified as H412 (and the same for R50/53) as a percentage

All environmentally hazardous substances in unhardened chemical products must be included in the calculation.

Table 25 Environmental hazard statements and indications of danger covered by the requirement

Hazard class	Hazard code and hazard statement according to CLP Regulation 1272/2008	Indication of danger and R-phrase according to EU Dangerous Substances Directive (67/548/EC)
Hazardous for aquatic life	Aquatic acute 1 with H400	N; R50
	Aquatic chronic 1 with H410	N; R50-53
	Aquatic chronic 2 with H411	N; R51-53
	Aquatic chronic with H412	R52-53

The amount of applied environmentally hazardous substances (g/m²) is then calculated as:

Applied amount $\left(\frac{g}{m^2}\right)$ x % by weight environmentally hazardous substances in total surface treatment

For tone systems, a worst case calculation is made for the surface treatment with the most tone in the basic colour containing the most environmentally hazardous substance under the weighted formula for the classifications.

☒ For alternative a), a declaration is required from the producer/supplier of each chemical product that the product is not classified as environmentally hazardous under the above table. Appendix 7 may be used.

☒ For alternative b) Declaration from producer/supplier of chemical product showing the content of environmental hazard classified substances covered by the requirement. The concentration of substances must be stated specifically for each indication of danger/R phrase. Appendix 8 may be used. Confidential information from the chemicals supplier may be sent directly to Nordic Ecolabelling.

☒ The calculation from the manufacturer of the finished panel/moulding showing the number of coats of surface treatment, the application method and the applied amount per coat indicated as g/m² panel/moulding. And the weighted calculation of

environmentally hazardous substances as shown by the requirement. Here information from Appendix 8 should be used.

☒ For UV-curing products: Description of the process and how waste and residual waste are handled, including information about who receives the residual waste from the performer of the surface treatment

Background for requirement (both requirements O24 and O25)

Environmentally harmful substances are substances, which are toxic in small quantities, which are persistent and/or may accumulate in living organisms (bioaccumulate). In other words, these substances should be used and supplied as little as possible, especially because their long-term effects on health and the environment are often unknown. Nordic Ecolabelling uses the official environmental hazard classification for chemical substances and products.

Both requirements have been changed by weighting the different environmental hazard classifications differently depending on the actual environmental danger, which the classified substances pose. This weighting skews restrictions towards substances classified as H410/R50/53.

The factors for environmental hazard classification in the criteria for chemical building products have been included in this requirement. These weighting factors derive from the chemicals legislation and are a good way of balancing the different environmental risks: H410 has been weighted with factor 100 as it is the most environmentally hazardous; H411 has been weighted with factor 10; and H412, the least hazardous for the environment, has been weighted with factor 1, i.e. no weighting has been applied.

Requirement O24

The requirement level has been set on the basis of knowledge of the chemical products used in the panel. The requirement relates to the total weighted quantity per kg panel, rather than the chemical product used. Thus, the requirement reflects the potential environmental impact of the actual panel. The requirement also allows the panel manufacturer the flexibility to select chemicals which give an overall reduced environmental impact.

Ammonia or ammonia water is used as a part-component in the binders of certain construction panels. The requirement includes an exemption for ammonia, which is classified as R50 due to its high pH value (concentration of 25% or more is classified with R50).

At concentrations of 24% or less the classification disappears again. Ammonia or ammonia water is thus irrelevant for calculating the potential environmental risk of the finished panel.

Phenol (CAS: 108-95-2) is also excluded from the calculation. Resin with phenol do not have a harmonized classification as environmentally hazardous, but several chemical suppliers self-classify phenol as environmentally harmful.[46] At present, there are no alternatives to phenol in HPL panels, and therefore an exception is given for phenol.

Requirement O25

As in the previous version of the criteria, the requirement has been formulated with the

[46] https://echa.europa.eu/information-on-chemicals/cl-inventory-database/-/discli/details/1011 (available 18.05.2021)

flexibility of two requirement alternatives. The manufacturer may choose to document that only chemical products without any of the indicated environmental hazard classifications in the requirement have been used. Alternatively, the manufacturer may choose to document the use of a surface treatment system with an overall low content of environmentally hazardous substances per functional unit (m^2 surface of panel).

The different panel types are often surface-treated to ensure a durable and easily cleaned surface. The surface treatment may be intended to ensure a durable surface and thus a long service life for the panel. Surface treatment is mainly in the form of water-based coatings. These include primers, sealers, undercoats and top coats, either alone or together in systems.

The criteria for chemical building products have recently been revised and extended to include industrial powder paints and wet paints and lacquers. It is desirable that a Nordic Ecolabelled paint will be used and accepted as a surface treatment product in the manufacture of Nordic Swan Ecolabelled panels. Hence, it is relevant to harmonise the requirements between the two product groups. However, there is an important difference, which prevents identical requirements for the product groups. A chemical building product such as paint must comply with the contents requirements as an individual coating product. But with Nordic Swan Ecolabelled construction panels, the whole quantity of the coating system must fulfil the requirement.

Surface treatment of a construction panel often involves coating with more than one product and several coats of different volumes. This makes it impossible to make a straight comparison. In extreme cases, a Nordic Swan Ecolabelled paint with a low content of some environmentally hazardous substance may be applied in such large quantities that the construction panel criteria for the requirement for environmentally harmful content cannot be reached. The opposite could also occur. In other words a paint, which does not meet the requirement for the Nordic Ecolabel is used in such small quantities that it is possible for a surface treatment system to comply with the requirements of the construction panel criteria.

In conclusion, Nordic Ecolabelling declares that as the requirement has been changed and now weights environmentally hazardous content with factors 1, 10 and 100, the requirement level for the applied quantity has been set to $40 g/m^2$. At first sight, the value may appear high, but it must **not** be compared with the limit of $5 g/m^2$ in the earlier version of the criteria, which did not weight the environmental hazard.

An exemption has been introduced for acrylates in UV-curing products. More and more acrylates are being classified as harmful to the environment or reclassified to a stricter environmental hazard classification - either by harmonized classification or self-classification. Examples of acrylates where this is the case are:

• TMPTA (CAS: 15625-89-5) - Self-classification as H410

• HDDA (CAS: 13048-33-4) - Self-classification as H411

• TPGDA (CAS: 42978-66-5) - Harmonized classification as H411

When an acrylate is reclassified from e.g. H412 to H411 it has a major impact on the total amount of environmentally hazardous substances applied and the calculation of the content of environmentally hazardous substances in the panel as the content is weighted

before calculation. Some acrylates have also gone directly from having no classification to being classified H411. Nordic Ecolabelling basically wants strict requirements for environmentally hazardous substances, but make an exemption for UV products as they also have benefits that are good from an environmental and health perspective. The panels get good properties against weather and wind, scratches, resistance to chemicals and color stability. This is important for quality and durability. UV products also do not contain VOCs, or have a very low VOC content, which is good for both the environment and health, as it does not emit harmful substances. The requirement that is set is harmonized with the requirement in Nordic Ecolabelling of furniture and fitments, generation 5 and means that the application must take place in a closed controlled process without discharge to drains. Residual products and any spills from the process must be collected and sent to an approved waste recipient. This requirement is set to prevent products with environmentally harmful substances from being discharged via the drain.

O26 Volatile organic compounds (VOC) in adhesives

Volatile organic compounds* including volatile aromatic hydrocarbons (VAH), must not be present in the adhesive by more than 3% by weight. Of these, VAHs (volatile aromatic hydrocarbons) may not amount to more than 0.1% by weight of the adhesive.

Resins/adhesives for HPL panel/moulding production are exempted from this requirement. Instead, the HPL panel/moulding shall fulfil emission requirements to formaldehyde and phenol and VOCs in general are set in requirement O30 and O33.

** Volatile organic compounds are here defined as:*

Organic compounds with a steam pressure exceeding 0.01kPa, at 20°C.

For products under EU Directive (2004/42/EC) in which steam pressure is not indicated:
Organic substances with an initial boiling point that is lower than or equal to 250°C measured at a normal pressure of 101.3 kPa.

✉ Declaration from the producer/supplier of the chemical compound that the requirement has been fulfilled. Appendix 9 may be used.

Background for the requirement

The requirement has not been changed since the last version, but has been given a separate requirement number. The requirement is particularly relevant for wood-based panels.

Here adhesive is usually present at 6-8% in chipboard, approx. 10% in MDF and 2-3% in OBS[47]. The adhesives are usually water-based but contain small quantities of VOC such as formaldehyde. The requirement applies to the adhesive used, but not any hardeners. Hardeners in wooden board production are often ammonium chloride or sulphate incorporated by less than 1% and is therefore not the focus of the requirement[48]. The purpose of the requirement is to ensure that the VOC content in the panel has been reduced to the minimum possible. The commonest adhesives are described briefly here:

Table 26 Adhesives in wood-based panels[49]

Adhesive type	Application	Contents	Additives
Urea formaldehyde adhesive	Chipboard and plywood	Urea, Formaldehyde (typically under 1%). Hardeners: ammonium chloride, ammonium peroxodisulphate, aluminium sulphate, weak acids.	Organic and inorganic fillers, e.g. coconut shell powder, gypsum, titanium dioxide. Additives as for PVAc adhesive.

[47] Draft report for BREF for the production of wood-based panels 2013
[48] Afbrænding af lettere forurenet træaffald i fyringsanlæg på fx møbelfabrikker Miljøstyrelsen 2008
[49] Sector analysis of environmental aspects of the wood and furniture industry MST 2000

MUF, melamine-urea-formaldehyde and MUPF, melamine-urea-phenol-formaldehyde adhesives	Chipboard and MDF	Melamine, Urea, Phenol (MUPF only) and Formaldehyde. Hardener: Resorcinol, formic acid.	Organic and inorganic fillers, e.g. ethylene glycol, blood albumen, casein, gluten. May contain wood preservative containing boric acid and monoethanolamine (MUPF) and colourant with acetic acid. Additives as for PVAc adhesive.
Phenol and Phenol resorcinol adhesive	Plywood	Phenol, Resorcinol, Hardener: Paraformaldehyde	Organic and inorganic additives, e.g. coconut shell powder, tannin, potassium carbonate, methanol, ethanol, sodium hydroxide. Additives as for PVAc adhesive.

According to the EU VOC Directive 1999/13/EC, volatile organic compounds are defined as compounds that at 293.15°K have a steam pressure of at least 0.01 kPa, or that have equivalent volatility in special application conditions. It is important to note that it is not a simple matter to calculate the steam pressure of a mixture from the steam pressure of the individual components. In composite products of this type, the steam pressure may be both lower and higher than the individual components of the product.

However, for simplicity, environmental labelling criteria calculate the steam pressure of a mixture from the individual components.

The group of VOCs contains thousands of different chemical substances. Examples of typical volatile organic compounds are isocyanates (hardeners) and formaldehyde. Volatile organic compounds in which one or several benzene rings are included are called volatile aromatic hydrocarbons (VAH), and are very stable. The expression "aromatic hydrocarbons" among other things describes benzene, toluene, mixed xylenes, orthoxylene, paraxylene and metaxylene (commonly known as BTX). Benzene is used to make styrene, cumene and cyclohexane. Most toluene is used to make benzene, phenol and toluene diisocyanate. The requirement for VAH is set out under the VOC requirements for the individual product groups, as VAH is a subgroup of VOC.

The reason for laying down a requirement for VOC is Nordic Ecolabelling's goal of reducing ozone formation near the Earth's surface. In addition, certain organic solvents contribute to the greenhouse effect, and some to depletion of the ozone layer. The working environment and indoor climate can also give grounds for concern when using the panels. Volatile organic compounds give particular grounds for concern because of their innate properties. "Organic solvents may be absorbed via the lungs and skin, and damage a number of organs. The damage may be acute or chronic. Acute injury after inhaling gases presents as e.g. headache, tiredness, etc. Organic solvents may also irritate the mucous membranes in the eyes, nose and throat. Organic solvents dry out the skin and can lead to eczema.

After longer exposure organic solvents can lead to chronic damage to the brain and nervous system. Symptoms may be memory loss, nervousness and irritability and, as time goes by, more serious mental changes, e.g. depression. Certain organic solvents lead to other irreparable damage such as cancer and damage to reproduction (foetal damage)"[50].

O27 VOC in surface treatment

The content of volatile organic substances (VOC) in the chemical products in the surface treatment system must be either

a) below 5% by weight for each chemical product, or

[50] Environmental Guidance Dictionary 2009

b) a maximum of 10 g/m2 surface of panel/moulding for the total surface treatment system

The requirement relates to the chemical products used in surface treatment with the chemical composition they have in wet form. If the product is to be diluted, the calculation must be based on the content of the ready-diluted product.

Volatile organic compounds are here defined as:
Organic substances with an initial boiling point that is lower than or equal to 250°C measured at a normal pressure of 101.3 kPa.

✉ Declaration from the producer/supplier of each chemical product in the surface treatment. The declaration must state the content of VOC in the product. If necessary, VOC information from the producer of the chemical product may be sent directly to Nordic Ecolabelling. Appendix 9 may be used.

✉ When using alternative b), the applicant must submit a calculation showing the total amount of VOC in the surface treatment system in g/m² panel/moulding. The calculation must be based on the declared VOC content of each chemical product and the amount present in the surface treatment system.

Background for the requirement

The requirement has hardly been changed compared to the previous version, as evaluation has shown that the requirement is still a strict one. Here the definition of VOC for paint and lacquer is that used in the EU Directive (2004/42/EC) which specifically covers this area. A different definition of VOC is here used than in the EU VOC Directive.

As in the previous version of the criteria, the requirement has been formulated with the flexibility of two requirement alternatives. The producer may choose to document the requirement in relation to the VOC content of the individual chemical products used. Alternatively, the manufacturer may choose to document the use of a surface treatment system with an overall low content of VOC per functional unit (m^2 surface of panel).

In the process industry solvent-based surface-treatment systems can still be found, mainly used together with recycling systems.

In the Nordic region, great strides have been made, thanks to the trade unions and trade organisations, which have urged the phasing out of solvent-based surface treatment systems. Water-based surface treatment products often have a VOC content of 0-10%. For Nordic Swan Ecolabelled panels and mouldings for interior use, the requirement has been set at max. 5% by weight and the criteria thus encourage surface treatment systems with a reduced VOC impact, both on the environment and the working environment.

For further background on VOC, see the background text to Requirement O26.

O28 Content of free formaldehyde in chemical products

The requirement does not apply to resin used for impregnation in HPL and laminate production. HPL and laminate production must instead comply with Requirement O30 Emissions from HPL production as well as requirement O33 Emissions from the panel/list.

The content of free formaldehyde in chemical products used for production of the panel may be up to 0.2% by weight (2000 ppm), except for adhesive products mixed with hardener. For adhesive products mixed with hardener, up to 0.2% by weight (2000 ppm) of free formaldehyde is permitted in the ready-to-use mixture.

The content of free formaldehyde in chemical products used for stone wool may be no more than 0.5% by weight (5000 ppm).

✉ Declaration from the producer of the chemical products used in the construction panel/moulding. Appendix 7 may be used.

Background for the requirement

The requirement has not been changed in this revision as it was tightened in the previous revision from 0.3% by weight to 0.2% by weight of the chemical product or mixture (for 2-component adhesives). The evaluation of version 5 of the criteria has shown that the requirement limit is still a tough one. Formaldehyde is further regulated in Requirement O32 in relation to the final formaldehyde emissions from the construction panel. However, in certain cases these two formaldehyde requirements can work against each other. This happens when the formaldehyde catcher used (which reduces the formaldehyde emissions from the finished panel) contains amounts of free formaldehyde, which exceed the requirement for 0.2% free formaldehyde. However, it is important to ensure as low a content of free formaldehyde as possible. In this revision it has been investigated whether it was possible to tighten the requirement further to 0.1%. However, it has been found, that the industry is not at that level yet regarding urea formaldehyde adhesives. However, no reports have been discovered, which describe this.

The requirement has been set to a level at which it is still possible to use formaldehyde catchers with a low content of free formaldehyde, making it possible to achieve low formaldehyde emissions from the finished panel.

Formaldehyde is a toxic and allergenic substance, which also has carcinogenic effects and should therefore be avoided or reduced as much as possible. For wood-based panels, the content of free formaldehyde in the employed chemical products will depend on factors such as which adhesive system is being used. Generally speaking, all the adhesives are water-based, rather than solvent-based.

Resins used for impregnation in HPL and laminate production have a high formaldehyde content. Free formaldehyde may be present at around 1% by weight. Also, formaldehyde oligomers (synthetic polymer) may be present with a weight percent of over 50. Normally the resins are used in open water-based baths, so it has been decided to lay down a specific requirement for emissions from HPL production. See Requirement O30.

4.3.6 Emissions

O29 Emissions to water in wet processes

The requirement covers wet processes in panel/moulding production where organic material is included. For panels/mouldings manufactured with wet processes, the COD emission to water may be no more than 20 g COD/kg product (unfiltered sample).

✉ The sampling programme, including measurement method, measurement results for the last 12 months, and measurement frequency. For processing and analysis methods, see Appendix 1.

Background for the requirement

The requirement is identical with the previous version of the criteria. The requirement governs contamination from effluents to water in the form of dissolved organic material from for example wood and bark. In this requirement, this fraction is stated as the content of oxygen-consuming substances, COD. The organic matter is broken down by microorganisms with the use of oxygen. This can lead to depleted oxygen levels - and in some cases, completely oxygen-free conditions - in the aquatic environment. This can have a negative effect on fish and benthic animals.

Debarking in the wet process generates a large quantity of waste water with a high tannin content which is difficult to remove. The tannins contribute to COD impact and discolour the waste water. Wet debarking has a high water consumption, and if steam is necessary, this also contributes to higher energy consumption.

The process water can be reused by the factory or recycled for other purposes on site. The quantity of process water reused varies from 0 to 100%. In recycling internal process water, the focus is on removing suspended solid substances (SS) and COD, and this is achieved by mechanical and physical methods such as simple filtering, clarification, sedimentation, coagulation/flocculation and micro-filtering, while the resulting slurry is removed with a filter presses and screw conveyors. The quality of the treated water will depend on the planned use of the recovered water. The slurry is often incinerated on site.

O30 Emissions from HPL production

In the case of production in countries where the mandatory national requirements are less stringent than the emission levels in this requirement, it must be documented that the following emissions levels have not been exceeded.

The requirement relates to panels/mouldings in which the content of HPL (High Pressure Laminate) accounts for more than 10% by weight of the panel/moulding.

The following limit values for emissions to air at the workplace may not be exceeded during production of HPL (High Pressure Laminate):

The limit value is expressed in relation to a reference period of 8 hours' time-weighted average (TWA):

Limit value for formaldehyde cas. no. 50-00-0: 0.5 ppm or 0.6 mg/m^3

Limit value for phenol cas. no. 108-95-2: 2 ppm or 8 mg/m^3

The limit value is expressed in relation to a short-term value of max. 15 min.:

Limit value for formaldehyde cas. no. 50-00-0: 1.0 ppm or 1.2 mg/m^3

limit value for phenol cas. no. 108-95-2: 4 ppm or 16 mg/m^3

✉ Air measurements for phenol and formaldehyde for the past 12 months, containing a description of the sampling programme, including measurement methods and measurement frequency. For analysis methods, see Appendix 1, or

✉ Description of mandatory national regulatory requirements, showing that the requirement automatically is followed.

Background for the requirement

The requirement is new and included in connection with the extension of the criteria to HPL panels. HPL panels consist of craft paper and decor paper impregnated with phenolic and melamine resin. During the hardening, drying and pressing process, the methanol, formaldehyde and phenol evaporate from the laminate. These substances are harmful to the environment and to health, but can be cleaned from the exhaust air with a special incineration technique. It is therefore important to ensure that the emissions level at the workplace is low and complies with the recommended limit values described by the Nordic authorities.

Resins used for impregnation in the HPL and laminate production has generally high formaldehyde content. Normaly about 1% by weight of free formaldehyde. At the same time the resin may include formaldehyde oligomer (synthetic polymer) with a weight percent greater than 50.

The limit value is the average concentration in the air which can be inhaled at the workplace during an eight-hour working day, but also includes short-term values and possible ceiling values. Short-term value means that even if the time-weighted average concentration does not exceed the limit value, the concentration in a time period of maximum 15 minutes must never exceed the limit value by a factor of 2. In Denmark, the limit value for formaldehyde is also a ceiling value and must therefore never be exceeded at any time.

In the Nordic Region, there are national emission values for both phenol and formaldehyde. These are either mandatory or, in some countries, advisory, but they may be made mandatory by official order. A limit value for phenol has also been defined in Commission Directive 2009/161/EU. However, this is not necessarily mandatory in all EU countries, and the requirement has therefore been laid down for all manufacture outside the Nordic Region to ensure that the level in the EU Directives is satisfied as a minimum for phenol and that the least stringent level from the Nordic authorities is complied with.

Phenol has an EU limit value of 2 ppm and 8 mg/m^3 laid down in Commission Directive 2009/161/EU. However, the EU Directive does not have direct legal application in the individual countries. Formaldehyde does not yet have an EU limit value. Table 27 below shows both EU and Nordic national limit values.

Table 15 Limit values for formaldehyde and phenol emissions in relation to the working environment

	Formaldehyde limit value		Phenol limit value	
	Working day (8 hours' exposure)	**Short-term value**	**Working day (8 hours' exposure)**	**Short-term value**
EU*	None	None	2 ppm or 8 mg/m^3	None
Denmark**	0.3 ppm or 0.4 mg/m^3	0.6 ppm or 0.8 mg/m^3	1 ppm or 4 mg/m^3	2 ppm or 8 mg/m^3
Sweden***	0.3 ppm or 0.37 mg/m^3	0.6 ppm or 0.74 mg/m^3	1 ppm or 4 mg/m^3	2 ppm or 8 mg/m^3
Norway****	0.5 ppm or 0.6 mg/m^3	1 ppm or 1.2 mg/m^3	1 ppm or 4 mg/m^3	3 ppm or 12 mg/m^3
Finland*****	0.3 ppm or 0.37 mg/m^3	1 ppm or 1.2 mg/m^3	2 ppm or 8 mg/m^3	4 ppm or 16 mg/m^3

** Commission Directive 2009/161/EU, ** Danish Working Environment Authority, *** Swedish Work Environment Authority, **** Norwegian Labour Inspection Authority: Regulations, Order no. 704, ***** Finnish Occupational Safety and Health Administration.*

O31 Dust emissions

In the case of production in countries where the mandatory national requirements are less stringent than the emission levels in this requirement, it must be documented that the following dust emission levels have not been exceeded.

The following limit values for emissions to indoor air must not be exceeded during the manufacture of panels/mouldings in relation to the working environment. The requirement relates to panels/moulding in which the content of mineral raw materials or wood raw materials individually accounts for more than 10% by weight of the panel/moulding:

Mineral dust, inert: 10 mg/m^3

Mineral dust, inert, breathable: 5 mg/m^3

Mineral wool: 1 fibre/cm^3

Wood dust, breathable: 2 mg/m^3

Organic dust, total: 5 mg/m^3

☒ Dust measurements according to the requirement for the past 12 months, containing a description of the sampling programme, including measurement methods and measurement frequency. For analysis methods, see Appendix 1,

or

☒ Description of mandatory national regulatory requirements, showing that the requirement automatically is followed.

Background for the requirement

The requirement is new and included because the criteria now contain several further types of panel production where it is of relevance to health to reduce dust emissions during panel production.

This applies to products such as cement-based panels, plasterboards and panels in mineral wool fibre. Mineral wool fibres such as fibreglass, slag wool fibre and stone wool fibre are classified as Carc 3 or as carcinogen category 2 in Annex VI of the CLP Regulation[51].

Production in countries where the official mandatory emission requirements are at the same or a stricter level than this requirement is exempted from the requirement. No limit values have been defined for the indicated emission types in the EU Commission directives (Commission Directive 2000/39/EC, Commission Directive 2006/15/EC, Commission Directive 2009/161/EU) of relevance to the area. On the other hand, all working environment authorities in the Nordic countries have defined limit values for mineral dust, wood dust and organic dust generally, which are relevant for panel production systems in the product group (table 28). In Denmark, these limit values are covered by the mandatory "Order on limit values for substances and materials". The limit values in Norway are not mandatory but may become so by order of the Labour Inspection Authority.

Such strict requirements are not to be expected in the rest of the world. For example, magnesium oxide panels are imported into the Nordic Region from manufacturers in Asia. This requirement will thus ensure that working conditions in relation to dust emissions are acceptable regardless of where the panel was manufactured.

Table 16 Limit values from the working environment authorities

	Mineral dust, inert limit value (8h)	**Mineral dust, inert, breathable** limit value (8h)	**Mineral wool** limit value (8h)	**Wood dust, breathable** limit value (8h)	**Organic dust** limit value (8h)
EU*	None	None	None	EU value	None
Denmark**	10 mg/m^3	5 mg/m^3	1 fibre/cm^3	1 mg/m^3	3 mg/m^3
Sweden***	10 mg/m^3	5 mg/m^3	1 fibre/cm^3	2 mg/m^3	5 mg/m^3
Norway****	10 mg/m^3	5 mg/m^3	1 fibre/cm^3	1 mg/m^3	5 mg/m^3
Finland*****	10 mg/m^3	10 mg/m^3	1 fibre/cm^3	1 mg/m^3 (new plant)	5 mg/m^3

*** Danish Working Environment Authority, **** Swedish Work Environment Authority, ***** Norwegian Labour Inspection Authority: Regulations, Order no. 704, ****** Finnish Occupational Safety and Health Administration*

O32 Formaldehyde emissions from woodbased panels/mouldings

The requirement covers all wood-based panels/moulding. For panels/mouldings which contain formaldehyde-based additives, or where the surface treatment includes formaldehyde, one of the two following requirements must be met:

[51] Order on limit values for substances and materials, Appendix 2

1. The average content of free formaldehyde must not be more than 5 mg formaldehyde/100 g dry substance for MDF panels/mouldings or 4 mg/100 g dry substance for all other panels/mouldings as determined according to the current version of EN-120 or similar methods approved by Nordic Ecolabelling (see section in Appendix 1).

The requirement applies to panels/mouldings in wood with a moisture level of H = 6.5%.

If the product have a different moisture level within the range 3-10%, the analysed perforator value must be multiplied by a factor F, derived with the following formula:

For chipboard: F=-0.133 H + 1.86 For MDF: F = -0.121 H + 1.78

2. The average emission of formaldehyde must not exceed 0.09 mg/m³ air for MDF panels/mouldings or 0.07 mg/m³ air for all other panels/mouldings as determined according to the current version of EN 717-1 or similar methods approved by Nordic Ecolabelling (see description in Appendix 1).

EN 717-1 shows correlation with test methods ASTM E 1333 and JIS A 1460. Alternative 2 of this requirement may be alternatively documented with these in relation to emission values in table Table 19 Correlation between EN 717-1 and other test methods.

Table 29 Correlation between EN 717-1 and other test methods

Test method:	EN 717-1 (23grC/45%RH)	ASTM E 1333 (25grC/50%RH)	ASTM E 1333 25grC/50%RH	JIS A 1460
MDF	0,09 mg/m³	0,06 ppm	0,07 mg/m³	0,66 mg L-1
Other panels/moulding	0,07 mg/m³	0,08 ppm	0,10 mg/m³	0,53 mg L-1

✉ Analysis report including measurement methods, measurement results and measurement frequency. It must be clearly stated which method has been used, who carried out the analyses and that the testing institution is an independent third party. Test methods other than those specified may be used if there is correlation between test methods and this can be confirmed by an independent competent third party. For more information on the test method, see Annex 1.

Background for the requirement

The background for the requirement is that the use of formaldehyde must be limited because it is harmful to health and can cause health problems during both manufacture and use of the products. Formaldehyde is a toxic and sensitising substance with a carcinogenic effect, and must therefore be limited as far as possible.

Pure formaldehyde is classified as R23/R24/R25, R34, R40 and R43.[52] From 04/01/2015 formaldehyde is reclassified to H350 (Carc.1B)/R45 and/or R49 and H341 (Muta.2)/R68.

Wood-based panels often contain adhesive systems with formaldehyde. The trend is to reduce formaldehyde emissions from the finished panel. However, one study has shown that there is a tendency for newly built houses, especially large ones, to contain formaldehyde in the indoor air. In two out of 20 homes examined, formaldehyde concentrations exceeded the limit value set by the World Health Organisation (WHO)[53].

Formaldehyde emissions from construction panels are communicated in the EU by the classification system defined in the harmonised standard for wood-based panels EN

[52] Swedish Chemicals Agency Regulations EC-harmonised binding classification and labelling, KIFS 2005:5, p. 192
[53] Senior Researcher Lars Gunnarsen and Ph.D graduate Ásta Logadóttir at Danish Building Research Institute (SBi), Aalborg University

13986, in which the current lowest emissions class is E1 with a level of 0.124 mg/m^3 and 0.09 ppm. The technical committee TC112 has proposed a new class E1 plus for the harmonised standard for wood-based panels EN 13986, with the following emission levels: 0.08 mg/m^3 and 0.065 ppm.

However, this class has not yet been finally accepted in the discussions between the standards organisations and the European Commission, as it conflicts with the national legislation in many countries[54].

In the previous revision of the Nordic Ecolabelling criteria for construction panels, the requirement from E1 was at first halved to ½ E1 for both EN-120 and EN 717-1 test methods. ½ E1 is 0.062 mg/m^3 for testing with EN 717-1. This proved to be technically possible but required an expensive process, and meant that the supply of these panels was very small, as the demand for ½ E1 panels was limited.

The requirement level for formaldehyde emissions from panels has been harmonised to cover the Nordic Swan Ecolabelling criteria for construction panels, furniture, outdoor furniture and play equipment, but particularly within the furniture industry it was impossible to find furniture panels of the required quality for the different functions of the product group, which at the same time complied with the ½ E1 formaldehyde requirement. The emissions level was therefore adjusted in version 5 of construction panels by the use of EN 717-1 chamber methods. When using the perforator method, the ½ E1 level has been maintained. The reason for the difference between the two standards is that a correlation between the perforator method in EN 120 and the chamber method in EN 717-1 shows greater uncertainty for the perforator method.

On this basis, together with Nordic Ecolabelling's experience of formaldehyde emission levels from wood-based panels as well as comments received during the consultation, it is assessed that the requirement levels for MDF can be tightened from 0.124 mg/ m^3 to 0.09 mg/m^3 when using EN 717-1. For other panel types, the already stringent level of 0.07 mg/m^3 is retained. Both requirement levels are tight, but regarded as realistic.

The limit value for the other panels (< 0.07 mg/m^3 according to the chamber method) was considered tough enough not to require further tightening when the criteria document is revised for version 6.0. Nordic Ecolabelling's proposed limit values for both MDF and other panels are 64% of the corresponding CARB P2 values and 56% of CARB P2 for thin MDF panels. Nordic Ecolabelling requirements are also between 58% (other panels such as chipboard) and 75% (MDF panels) of the E1 limit values. Here a Carb P2 certificate cannot be used as documentation alone. It has to be supplemented by a underlying test report.

O33 Emission requirements for the panel/moulding

The finished panel/moulding must comply with the emission levels set out in Table 30 Emission levels.

The panel/moulding must be tested in accordance with CEN/TS 16516, ISO 16000-3/-6/-9/-10 or equivalent test method. Testing must be carried out by an accredited third party.

[54] Personal contact, Gonçalo Ascensão, Program Manager, CEN

The requirement includes the following panels/mouldings:

- The formaldehyde requirement in the table does not apply for wood-based panels/mouldings, which instead must fulfil requirement "O32 Formaldehyde emissions from wood based panels/mouldings".
- Forwood based panels/mouldings (including produts in solid wood) the VOC requirements in the table 30 below only apllies to products with surface treatment . All other types of panels must comply with the emission levels for both TVOC, SVOC and formaldehyde.

Table 30 Emission levels

Substance groups	Limit value after 28 days in µg/m³*
TVOC (C6-C16): other panels/mouldings than wood based	160
TVOC (C6-C16): wood based with surface treatment	400
SVOC (C16-C23): other panels/mouldings than wood based	30
SVOC (C16-C23): wood based with surface treatment	100
Formaldehyde: other panels/mouldings than wood based	30

** Conversion between µg/m²h and µg/m³, requirements for analysis laboratory and testing methods are described in Appendix 1.*

Other analysis methods are acceptable if considered equivalent by an independent competent body.

☒ The test report showing that the limit values in the table above have been satisfied. It must be clearly stated which test standard is being used, which laboratory has carried out the analysis and that the analysis laboratory is accredited by an independent third party, see Appendix 1. Valid certificate from a relevant indoor climate label may be used as documentation, if the certificate or the dependent expert states that the requirement is met.

Background for the requirement

The requirement is new for this product group. Construction materials are of great importance for the indoor climate in construction. It is therefore important to ensure that Nordic Swan Ecolabelled building panels contribute to a good indoor climate. For building panels for indoor use, it is found relevant with a emission requirement, focusing on the selected parameters - TVOC, SVOC and formaldehyde.

Wood-based panels without surface treatment are not subject to this requirement. Instead, wood-based panels have to fulfil a specific requirement for formaldehyde emission in O32. At the same time, the adhesives in wood-based panels have to fulfil a specific requirement for VOC in adhesives and coatings and the general strict chemical requirements for incoming chemical products in the panel. For other panel types besides wood-based panels, there is found relevance for a emission requirement for example for HPL panels. For HPL panels the adhesives have not been covered by a specific VOC requirement. Substances in chemical products with CMR classifications are excluded in requirements O19 for all panels, but Nordic Ecolabelling wants to go further and ensure that also TVOC and SVOC emissions are low.

Emissions from construction panels may come from the following sources:

- Products used for surface treatment (lacquer, oils)
- Raw materials in the panel, such as plastic, wood, decor paper, additives in the raw material, etc.
- Other chemicals used, e.g. adhesives in wood fibre panels.

It is possible for manufacturers to replace harmful substances with less harmful substances and thereby reduce emissions. However, certain materials and chemicals are essential for producing construction panels of a satisfactory quality. Manufacturers may choose various materials and chemicals for their construction panel products and there is therefore a definite potential for achieving a better indoor climate.

Common emission parameters in existing indoor climate labelling schemes are: formaldehyde, volatile organic compounds (TVOC, SVOC and, in some schemes, individual VOCs), total CMR substances, ammonia, NH_3, (less common) and odour (less common). TVOC and SVOC are umbrella terms for volatile organic compounds and semi-volatile organic compounds and also include, for example, natural terpenes from pine. One challenge is that the emission requirements in the different schemes are often somewhat unlike, both in the parameters tested and in the limit values. Nordic Ecolabelling has made a list of the different indoor environmental requirements laid down in the different certification schemes for buildings[55].

In the consultation for construction and facade panels, Nordic Ecolabelling called for feedback to this new requirement. The incoming comments were mainly related to differences in the emission levels of the wood-based panels and other panel types. The formaldehyde reclassification coming in 2015 was also an issue. This will affect the level of classified carcinogens substances in the panels. In reviewing the Nordic Swan Ecolabelling criteria for floors, it was tested in the consultation what added value an emission requirement will provide.

The added value should be assessed against, that products in the product group already meet tough chemical requirements. About half of the comments for floor consultation were positive to an emission requirement.

In both the consultation on floors and construction and façade panels, it was pointed out that the proposed requirement levels were too harsh for the wood-based products.

The requirement has therefore, after the consultation, been adjusted. Now wood-based panels without surface treatment is not covered by the requirement, as these are handled with in other requirements (eg . O26 and O32). At the same time there is added a specific requirement level for SVOC (C16 - C23) of 0.1 mg/m^3 for including semi - volatile organic compounds. The decline in the use of VOCs has led to increased use of SVOCs[56,57]. The big problem is that SVOC can redistribute from a surface, for example paint, to other surface, from which they can be inhaled and ingested[58]. Not all indoor climate labels reports the contents of SVOC.

After the consultation the documentation requirements are also updated. Now it is possible to document the requirement with other indoor climate label certificates than MI. The changes in the requirement levels make several indoor climate labels actual as documentation. In this version of the criteria Nordic Ecolabelling have decided not to set limits in individual VOCs because there are not yet harmonized LCI values in EU.

[55] This document is in Norwegian and can be obtained from Nordic Ecolabelling by sending a mail to sara.bergman@svanen.se
[56] European Collaborative Action. Urban air, indoor environment and human exposure. Report No 27; Harmonisation framework for indoor material labelling schemes in the EU (2010)
[57] CEN/TC 351 Construction products: Assessment of the release of dangerous substances.
[58] EnVIE; Coordination Action on Indoor air Quality and Health Effects

The requirement is adjusted from version 6.3 to 6.4. It has become clear that the thredshold for formaldehyde emission for non-wood-based panel is very low at 4 μg/m^3. The value was initially inspired by the M1 standard.

However, after the consultation, it was decided not to harmonize with M1, as there for M1 are used conversions factors for different parameters in the emisssion calculation for the M1 requirement level depending on which product type the requirement applies to. Therefore, the M1 levels can not be matched with the Swan requirements in construction boards, and the level should therefore have been changed.

At the same time, the level of TVOC is also set too low compared to what is possible. The requirement is now adjusted, then TVOC emission from surface treated wood panels is changed from 300 to 400 μg/m^3 and formaldehyde emissions from wood-based panel from 4 μg/m^3 to 30 μg/m^3. At the same time the unit is changed from mg/m^3 to 30 μg/m^3.

The majority of the existing indoor climate labelling schemes are based on EN ISO 156000:2006, the international standard for determining volatile organic substances from construction products[59]. However, there is a difference in how the indoor climate labels evaluate and present the results.

In 2013, the following standard was also developed and published under the EU Construction Products Regulation, 89/106/EEC[60]: CEN/TS 16516:2013, "Construction products - Assessment of release of dangerous substances. Determination of emissions into indoor air". This is a new harmonised testing method for indoor air quality studies, and relates to the ISO 16000 series. Hence, the requirement refers both to the ISO 16000 series and CEN/TS 16516:2013.

The requirement allows for alternative analysis methods to be accepted if they are judged as equivalent by an independent competent body. The differences between the various tests are relatively complicated, and Nordic Ecolabelling therefore wishes the comparison to be made by competent laboratories or the like. For example, the Danish Indoor Climate Label (DIM) is a much used and reputable label in the Nordic Region. Its certificate states a so-called "indoor climate relevant time value" which in simple terms states how long it takes from when a product is installed in a building until emissions have reduced to an acceptable level from a health point of view.

Requirement O33 states a limit value for TVOC and SVOC rather than limit values for individual VOCs. The main reason for this is that as yet no common international limit values for individual VOCs exist. Work is proceeding on the development of international levels, LCI values (Lowest concentration of interest), but no date has been set for concluding this work. In the next revision of the criteria, it must be assessed whether to alter the emission requirement to fall more in line with the EU recommendation of setting requirements for individual VOCs via LCI values, if the values have become internationally standardised.

[59] Report No 27 Harmonisation framework for indoor material labelling schemes in the EU, The European Commission Joint Research Centre, 2010
[60] Eurofins, VOC emissions from products, at website http://www.eurofins.com/product-testing-services/information/compliance-with-law/european-directives-and-laws/construction-products/voc-emissions-under-cpr.aspx (visited 31 January 2014)

Nordic Ecolabelling has chosen not to lay down requirements for ammonia and odour. Only the M1 scheme tests for ammonia.

BREEAM-NOR does not require an ammonia test if the producer of the construction product confirms that ammonia is not relevant or that the product does not contain substances which can liberate ammonia. Currently, according to Eurofins, the odour tests are not directly comparable[61]. However, quite recently, a standard for odour testing (ISO 16000-28) has been published. Hence, it may be relevant in the next revision to consider expanding the requirement to cover odour, if odour testing becomes more comparable.

4.3.7 Quality, properties and maintenance of the product

O34 Quality and properties of the product

For products covered by a harmonised standard, the properties and functions with which the product is marketed must be documented by a declaration of performance (DoP). As documentation, an example of CE marking and declaration of performance pursuant to the Construction Products Regulation (305/2011/EC) should be submitted.

For products that are not covered by a harmonized product standard, the panel's properties and functions may be declared by one of the following three alternatives:

1. either by a voluntary CE marking and declaration of performance in accordance to an ETA (European Technical Assessment).
2. or alternatively to an ETA, the panels properties may be declared by an relevant third-party verification of the performance of the product. In this case, this third party verification shall be approved by Nordic Ecolabelling.
3. or for non-load bearing product, the properties can be declared with relevant standardized quality test with integrated internal factory control. In this case, the choice of test standard shall be approved by Nordic Ecolabelling.

☒ For products covered by a harmonised product standard, it should be stated which product standard(s) cover the product and the declaration of performance should be submitted.

☒ For products not covered by a harmonized standard there shall be submitted either:
• a declaration of performance in accordance with an ETA for the Nordic ecolabelled product
• other third-party verification of the properties and performance of the product.
• a description of the quality standard and test results as described in the requirement.

Background for the requirement

The requirement is new for the product group.

For construction panels covered by a harmonised product standard, it is a requirement of the EU Construction Products Regulation (CPR) that the CE marking of the panel must be accompanied by a Declaration of Performance (DoP). The contents of the DoP are described in Article 6 and Annex III of the CPR.

The aim of this requirement is to secure conformity between the properties and the functions with which the panels are marketed, the performance declaration and CE marking or other verification of properties. At the same time the requirement must ensure that panels not covered by a harmonised product standard also have documentation for the properties and functions with which the panel is marketed on the basis of standardised test results.

[61] Correspondence with Eurofins, November 2013

Harmonised standards
Harmonised standards is the term for standards deriving from EU legislation. In principle, the standards are voluntary, but in practice they are the easiest way of proving compliance with a Directive's requirements, as compliance with the standards gives a presumption of compliance with the Directive. In practice, the standards thus become an integrated part of the legislation. The harmonised standards (hEN) are drawn up for known product groups. For construction products covered by harmonised product standards, CE marking is mandatory.

According to the EU Construction Product Regulation, innovative products are all types of products and construction systems not covered by a harmonised standard. The innovative aspect implies that there are no previously laid-down standards or specifications for evaluating and verifying the product's properties. In the case of innovative products, a declaration of performance can instead be issued under an ETA approval (European Technical Assessment).

Voluntary standards
The EAD (European assessment document) is for innovative products. CE marking under an EAD is voluntary. The process for achieving CE marking on the basis of an ETA (European Technical Assessment) is the same as for a harmonised standard. ETA is a voluntary scheme for construction products, which are not covered by the harmonised standards. It functions as a basis for a declaration of performance. The manufacturer must document that the product currently being marketed conforms to the requirements in the standard or is identical with the product described in the approval.

The European Technical Assessment is issued by a Technical Assessment Body (TAB) on the basis of a European Assessment Document (EAD) adopted by the European Organisation for Technical Assessment (EOTA)[62].

When proceeding applications for the new generation 6 of the criteria it has emerged, that for some types of panels, which are not covered by mandatory requirements for CE-marking, quality standards with implemented requirement of factory control can be relevant. These standards are widely used in parts of the panel industry and adapted to very specific types of panels. For example EN 622-5 Wood fiber boards - Specifications Part 5: Requirements for MDF boards, produced by dry processes. This standard is used by panel producers and the standard has specific requirements for how factory control must be carried out in connection with production and the quality and properties of the panel.

To make it clear to the industry, that they can use the standardized quality systems they already use, the requirement is adjusted with an additional alternative for non-load-bearing plates, not covered by CE marking. Here an internal factory control can be accepted as an alternative to a third party verification, if it is described in the relevant quality standards. Selection of quality standards must also be approved by Nordic Ecolabelling

O35 Information about the product

The manufacturer/supplier must inform the consumer about how best to use, maintain and store the product. The information must be given in the official language of the country in which the Nordic Ecolabelled product is marketed.

[62] http://ec.europa.eu/enterprise/sectors/construction/declaration-of-performance/assessment-documents/index_en.htm

The product must be accompanied by written instructions, which state:

- The area of use for which the product is intended.
- How the product is to be stored on the building site.
- Assembly and instructions for any surface treatment.
- How the product is to be maintained, which maintenance products are suitable for the product (paint, oils, etc.) and how often these maintenance products must be used.

✉ Copy of information material, which accompanies the construction panel.

Background for the requirement

The construction board achieves its optimum performance when used in accordance with the intended use and maximum product life through maintenance and proper storage. Reduced lifetime of the product results in an overall increase in environmental impact of the building board and it is therefore important that information on proper maintenance and use of the building board are disclosed.

4.3.8 Quality and official requirements

To ensure that the Nordic Ecolabel requirements are met, the following procedures must be implemented.

If the manufacturer has a certified environmental management system in accordance with ISO 14 001 or EMAS in which the following procedures are implemented, it is sufficient for the accredited auditor to confirm that the requirements are being implemented.

O36 Person responsible for the Nordic Swan Ecolabel licence

One person at the enterprise must have responsibility for ensuring that the Nordic Ecolabel requirements are fulfilled, and one person must act as a contact with Nordic Ecolabelling.

✉ Organisational structure showing those responsible for the above.

O37 Documentation

The licence holder must be able to produce a copy of the application and data and calculation material (including test reports, documents from subcontractors and the like) for the documentation submitted in connection with the application.

🔑 To be checked on site.

O38 Product quality

The licence holder must guarantee that the quality of the Nordic Ecolabelled panel/moulding will not deteriorate during the period of validity of the licence.

✉ Procedures for receiving and, where necessary, dealing with claims/complaints concerning the quality of the Nordic Ecolabelled products.

O39 Planned changes

Planned product and market changes that affect the Nordic Ecolabel requirements must be reported in writing to Nordic Ecolabelling.

✉ Procedures showing how planned product and market changes are to be handled.

O40 Unforeseen non-conformities

Unforeseen non-conformities that affect the Nordic Ecolabel requirements must be reported in writing to Nordic Ecolabelling and logged.

☒ Procedures showing how unforeseen non-conformities are to be handled.

O41 Traceability

The licence holder must be able to trace the Nordic Ecolabelled product in the production process.

☒ Description/procedures for how the requirement is to be met.

O42 Take-back system

The Nordic Ecolabelling's Criteria Group decided on the 9 October 2017 to remove this requirement.

O43 Legislation and regulations

The licencee must guarantee adherence to safety regulations, working environment legislation, environmental legislation and conditions/concessions specific to the operations at all sites where the Nordic Ecolabelled product is manufactured.

No documentation is required, but Nordic Ecolabelling may revoke the licence if the requirement is not fulfilled.

Requirements O36 to O43 are general quality assurance requirements for ensuring that the Nordic Ecolabelled products fulfil the requirements and comply with legislation and regulations such that the products maintain the environment quality, which is the purpose of the requirements. Most of these requirements are general and apply to all production of Nordic Ecolabelled products. Individual requirements are not justified in greater detail here.

5 Changes compared to previous version

Table 31 Changes compared to previous version of the criteria

Revised criteria (6.0)	Previous criteria (5.0)	Comment
O1 Information	R1	The requirement has been reformulated with a new materials table.
O2 Heavy metals	R8	The limit values in the requirement have been tightened since the previous version. There is introduced additional test method in the form of EN 13656.
O3 Dust emissions	R9	The requirement level has been changed since the previous version.
O4 Radioactive substances	R10	The requirement level has been tightened since the previous version from 1 to 0.5. A new specification of raw materials covered by the requirement has been added.
O5 Paper, cardboard and pulp	New requirement	A requirement for certified or recycled fibre has been added, as several panel types contain paper, especially the new HPL panel type. FSC and PEFC Mix can be used as documentation.
O6 Solid wood, veneer and bamboo - origin and traceability	R2	The requirement has been updated to harmonise with Nordic Ecolabelling's latest wording of the requirement for origin and traceability. At the same time, the requirement has been extended to include bamboo.
O7 Certified solid wood, veneer and bamboo	R4	The requirement has been updated to harmonise with Nordic Ecolabelling's latest wording. The requirement has been tightened since the previous version, from 50% to now 70% certified wood.
O8 Biocides in connection with felling	R3	The requirement has not been changed compared to the previous version.
The requirement has been omitted	R5 Bleaching of paper and cardboard	The requirement has been removed, as RPS analysis has shown that this is not where the greatest environmental relevance, potential and controllability for the product group lie.
O9 COD emission from paper	R6	The requirement has been updated with differentiated requirement levels according to the type of pulp or paper used. Has both been tightened and relaxed, depending on the pulp type.

Revised criteria (6.0)	Previous criteria (5.0)	Comment
The requirement has been omitted	R7 Tensides for cleaning recycled fibres	The requirement has been removed, as RPS analysis showed that this is not where the greatest environmental relevance, potential and controllability for the product group lie.
O10 Resource requirements for plasterboards	R19	The requirement has been changed to a pure energy requirement without weighting of other parameters such as certified, recycled or renewable raw materials.
O11 Resource requirements for mineral wool and cement based panels	R20	The requirement has been changed to a pure energy requirement without weighting of other parameters such as certified, recycled or renewable raw materials. The product group now includes cement based panels.
O12Energy requirements for paper and pulp production	New requirement	The requirement has been added as several panel types contain paper, especially the new HPL panel type. Applies in cases with more than 30% by weight paper/pulp in the panel.
O13 Energy require-ments for HPL panel production	New requirement	The requirement has been added as the product group now includes HPL panels.
O14 Energy requirements for wood-based panels	R19	The requirement has been changed to a pure energy requirement without weighting with other parameters such as certified, reused and renewable raw materials.
O15 Energy requirements for plasterboards	R19	The requirement has been changed to a pure energy requirement without weighting with other parameters such as certified, reused and renewable raw materials.
O16 Energy requirements for mineral wool panels	R20	The requirement has been changed to a pure energy requirement without weighting with other parameters such as certified, reused and renewable raw materials.
Requirement omitted	R21 Emission to air	The requirement has been omitted, as the focus in the new energy requirements is on primary energy. For cement-based panels a CO_2 weighting has been included in the energy requirement.
O17 Energy requirements for cement-based panels	New requirement	A new requirement has been added specifically for cement-based panels.
O18 Ecolabelled products	New requirement	If the chemical product is Nordic Ecolabelled, all requirements except O24, O25 and O27 in Section 4.3.5 are automatically fulfilled for the chemical product.
O19 Classification of the chemical product	R11	Requirement level unchanged. The requirement has been updated to accommodate CLP and the new product types in the product group.
Requirement omitted	R12 Cleaning chemicals	The requirement has been removed, as RPS analysis showed that this is not where the greatest environmental relevance and potential for the product group lie.
O20 CMR classification of constituent substances	Was included as part of R13	Has received its own requirement number and has been updated to match CLP, otherwise unchanged.
O21 Excluded substances in chemical products	Was included as part of R13	The requirement has now been clearly limited to cover only the chemical products used for the production of construction panels. The requirement has been extended to include isocyanates (apart from one exemption), Candidate List substances, potential endocrine disruptors in Category 1 or 2 on the EU Priority List and PBTand vPvBsubstances. Certain substance groups have been taken out of the requirement and given their own requirement number.
O22 Biocides	Was included as part of R13	The requirement for preservatives in chemical products has been formulated as a separate requirement in this version. The requirement for isothiazolinone has now been differentiated, with a specific level for outdoor paint and lacquer and a max. limit of MI (2-methyl - 3 (2H) - isotiazolon) is inserted.
O23 Nanoparticles	R15	The requirement has been reworded in this version of the criteria and it is specified that polymer emulsions are not considered to be nano material, or in the case of an exemption from the requirement.
O24 Environmentally harmful substances in the panel	R16	The requirement has been changed by weighting the different environmental hazard classifications differently depending on the actual environmental hazard, which the classified substances pose.

Revised criteria (6.0)	Previous criteria (5.0)	Comment
O25 Environmentally harmful substances in the surface treatment	R17	The requirement has been changed by weighting the different environmental hazard classifications differently depending on the actual environmental hazard which the classified substances pose.
O26 VOC in adhesive	Was included as part of R13	VOC level unchanged. Requirement for VAH tightened from 1% by weight to 0.1% by weight.
O27 VOC in surface treatment	R18	The requirement level is unchanged compared to the previous version, as evaluation has shown that the requirement is still a strict one.
O28 Free formaldehyde	R14	The requirement has not been changed in this revision.
O29 COD Emission to water	R6	The requirement has not been changed in this revision.
O30 Emissions from HPL production	New requirement	New requirement added because of expansion of product group to include HPL panels.
O31 Dust emissions from panel production	New requirement	The requirement is new and included because the criteria now contain several further types of panel production where this is relevant.
O32 Formaldehyde emission	R23	The requirement levels for MDF panels have been tightened from 0.124 mg/m^3 to 0.09 mg/m^3 with the use of EN 717-1. In addition, a translation key to ASTM E 1333 and JIS A 1460 is added. The remainder of the requirement is unchanged.
O33 Emission requirement	New requirement	The requirement is new for the product group and must be seen as a supplement to the chemical requirements for constituent substances which already ensure a low VOC content and that no carcinogens are used. The requirement has been included as indoor climate certification schemes are widespread in construction panels and used as documentation within sustainable construction.
O34 Quality and properties	New requirement	The requirement is new for the product group. The aim of this requirement is to secure conformity between the properties and the functions which the panels are marketed, the performance declaration and CE marking or other verification of properties.
O35 Information about the product	R26	The requirement has been reformulated and a requirement for stating the area of use has been added.
O36-O43	R28-R34	The requirements are unchanged.

6 New criteria

The work on the next version of the criteria will include following focus:

- Assess if the energy requirements can be sharpened and look at the possibility to expand the system boundaries in relation to include more raw material and material production in the energy requirement. For example examining the potential for energy requirements for production of resin and other adhesives, with special focus on energy for raw materials.
- Looking at the opportunity for tightening requirements in favour of higher share of recycled materials, e.g. in plasterboards
- Evaluate, whether the chemical requirements can be sharpened.

Appendix 1 Other labelling schemes

Green Building Council (GBC)
About 90 countries throughout the world are members of GBC, which is a network for national Green Building Councils. Green Building Councils are membership-based organisations, which collaborate with businesses and the authorities. It is for national GBCs to choose the sustainable construction schemes, which they wish to represent. Green Building Councils have been established in Sweden, Norway, Finland and Denmark, but with different certification schemes for sustainable construction. Further descriptions of the different labelling schemes are given below.

Labelling schemes in the Nordic Green Building Councils[63]:

- GBC-NO has selected a Norwegian version of BREEAM,
- GBC-SE represents BREEAM, LEED, Swedish Green Building Council and GREENBUILDING.
- GBC-DK has chosen to implement a Danish version of the German scheme DGNB
- GBC-FI has a policy of neutrality, but both LEED and BREEAM are used in Finland.

As these sustainability schemes have different environmental criteria, the construction panel manufacturers in the Nordic Region are subject to different requirements for environmental documentation, depending on the scheme being applied. As described below, BRE (British Building Research Establishment), which is also responsible for BREEAM, has developed a classification system for building products.

BREEAM
BRE Environmental Assessment Method or BREEAM was introduced in 1990 as one of the first certification schemes for sustainability in the UK. Today the certification scheme is also used outside the UK, and Norway has adopted a Norwegian version, BREEAM NOR, in which a large part of the Norwegian building industry contributed to adapting the standard to Norwegian conditions. Ecolabelling Norway has been involved in the development of BREEAM NOR, and has ensured that Nordic Ecolabelled products earn points in the chapters on use of materials and indoor climate (and in some cases for responsible purchase of wood, etc.) The use of Nordic Ecolabelled products can also be used as documentation that the products do not contain substances banned by the Norwegian authorities on the Norwegian Environment Agency (formerly KLIF) "Priority List".

[63] The Nordic GBC websites

BRE classification system
BREEAM has compiled a "Green Guide" which awards points on a sliding scale for the use of building materials with defined classifications. The Green Guide is based on the BRE Global Environmental Profiles Scheme for Type III Environmental Product Declarations (EPD) for building products[64].

In cooperation with the British government and 24 trade associations in the building sector, BRE has developed a standard methodology for life cycle assessment of all forms of building products in respect of 13 different environmental categories[65]. The total environmental impact of a specific product or a specific process is measured in "ecopoints". The total number of ecopoints derives from the result of the different impact categories and is calculated by multiplying the normalised impact by its percentage weighting. The average environment impact of a typical UK resident is here used as a reference value and corresponds to 100 ecopoints. The higher the ecopoint figure, the greater the environmental impact.

For example, on the basis of a life cycle analysis, ROCKPANEL has received a BRE EPD (Building Research Establishment Environmental Product Declaration) which ranks the products among the best in categories A+ and A for different constructions[66].

In this way BRE environmental product declarations are used as a form of environmental label, but on the basis of Type III environmental labels! The advantage of this is that it provides both LCA information for a possible LCA and the ecopoint ranking gives a guideline as to what is environmentally favourable or poor. The disadvantage is that the system is not transparent. It is not clear what specific environmental performance has been achieved and what is necessary to achieve label A+.

LEED
LEED (Leadership in Energy and Environmental Design) is an American certification scheme. The development of LEED began in 1993 with the establishment of the American Green Building Council, USGBC, and the first LEED version 1.0 was launched in 1998. LEED has been used for a considerable number of projects, mainly in the USA, but also in a number of other countries.

DGNB
DGNB (German Sustainable Building Certificate) is a German certification scheme developed by DGNB (German Sustainable Building Council). Alone among the Nordic countries, Denmark has implemented a Danish version of DGNB, Standard DGNB-DK.

Environmental labels Type I
Environmental labelling is a voluntary scheme for showing the environmental properties of a product or service. This is done via certification according to a number of previously determined requirements (criteria).

[64] http://www.bre.co.uk/page.jsp?id=1578
[65] http://www.rockpanel.dk/anvendelse/holdbarhed/bre
[66] http://www.rockpanel.dk/anvendelse/holdbarhed/bre

The Nordic Ecolabel and similar environmental labels are so-called Type I environmental labels (cf. Standard ISO 14024) and demonstrate the following:

- that the requirements are based on a selection of the most important environmental aspects of the whole life cycle
- that the requirements have been determined in an open and transparent process, in which all stakeholders have the opportunity to participate
- that an independent third party has checked that the product/service complies with the laid-down criteria

The requirements for a product area have been set to an environmental level such that only the environmentally best products on the market can be awarded an environmental label.

LEED, BREEAM and DGNB are all schemes which are life-cycle based, multi-criteria based and third-party controlled. However not all are Type I environmental labels, cf. ISO 14024, as some of the schemes are not transparent with definitely fixed requirement levels.

Alongside the Nordic Ecolabel, the following environmental label type I criteria exist for construction panels:

- Blaue Engel, German environmental label administered by the Federal Environmental Agency (FEA)[67]. It has criteria for "Low-emission Composite Wood Panels RAL-UZ 76" (11 licences).
- EcoLogo[68], a Canadian environmental label administered by Environment Canada. It has criteria for: "Construction Framing Materials and Assemblies" (0 licences, 02.01.2009), "Gypsum Wallboard" (1 manufacturer has a licence with approx. 200 trade names, 02.01.2009) and "Fibreboard from Recycled Resources" (0 licenses, 02.01.2009).

In addition, there are criteria in Japan, Korea, Australia and Taiwan, etc., but these national environmental labels do not appear to be much used in the Nordic market.

Environmental Product Declarations (EPDs)
An EPD (Environmental Product Declaration) is a verified environmental product declaration for a product. An EPD is a Type III environmental label as defined in Standard EN 14025 and under this standard must contain information about the most important environmental properties of a product during the whole of its life cycle. The scheme is mainly aimed at B2B manufacturers and EPDs are much used in the building sector for different construction products.

Here, no environmental requirements are laid on the products, so all products can be given an environmental product declaration regardless of how much or how little they impact the environment. Assessing an environmental product declaration thus requires a good deal of knowledge on the part of the reader.

[67] "The Blue Angel", the official German environmental label, accessible from http://www.blauerengel.de/en/index.php (02.01.2008)
[68] EcoLogo, the official Canadian environmental label, Accessible from: http://www.ecologo.org/en/ 02/01/2008

To a certain extent it has been ensured that the information is gathered and calculated in the same way, so it is theoretically possible to compare EPDs for competing products in a product group. However, until now the challenge has been that there are different "Product Category Rules" (PCR) in different countries for the same product group.

The PCRs lay down the premises for formulation of the EPDs. If there are EPDs for the same product group from several countries, which are based on different PCRs, they are not necessarily directly comparable as they may make different assumptions or have different bases. Some Norwegian EPDs bear the words: "EDPs from other program operators than the Norwegian EPD Foundation may not be comparable". This makes it hard for consumers (and environmental consultants) to compare the EPDs for the products. There can also be a difference in how many phases of the product's life cycle are included in the different EPDs. This is thus another area to be aware of in making comparisons.

Often EPDs contain no specific information about chemicals classified as harmful to health or an environmental hazard, which are used in production or present in the product.

The Standard "EN 15804:2012 Sustainability of construction works - Environmental product declarations - Core rules for the product category of construction products" describes the general product category rules (PCR) for developing EPDs for construction products. It is now the intention to develop product-specific PCRs. There are several examples of businesses developing EPDs on the basis of EN 15804 if there is no PCR for the product group.

Procurement requirements (GPP)
There are EU GPP criteria for wall panels (gypsum and wood-based) and for construction work, which also includes building materials[69]. The Swedish Environmental Management Council[70] has procurement criteria for new build and rehabilitation, but not specifically for construction panels. DIFI (Norwegian Agency for Public Management and eGovernment)[71] has guidelines for the building process. In October 2010, the Danish Ministry of the Environment established the Forum on Sustainable Procurement. The Forum's aim is to promote environmentally conscious and sustainable procurement by professional buyers of goods and services - both in public and private organisations. This is done by means of newsletters, conferences, after-hours meetings and much more. The Forum includes a construction group.

Indoor climate labels
For the construction panels product group, different emission and indoor climate labels are used. For wood-based panels, there is a big focus on formaldehyde emission, while for all construction products generally, including construction panels used inside the climate screen, the focus is on the product's influence on the indoor climate of the building, as defined by parameters such as emission of VOC, carcinogens (including formaldehyde) and odour.

[69] http://ec.europa.eu/environment/gpp/pdf/toolkit/construction_GPP_product_sheet_da.pdf
[70]Swedish Environmental Management Council Information on procurement criteria. Retrieved April 8, 2012 from: http://www.msr.se/
[71]DIFI Norway. Norwegian Agency for Public Management and eGovernment Information about public procurement. Retrieved April 8, 2012 from: http://www.anskaffelser.no/tema/2009/06/miljokriterier

International emission test
EN ISO 16000: 2006 is the international test for determining volatile organic substances from construction materials. Several indoor climate labels use EN ISO 16000 as a test, but there are differences in how the results are evaluated and presented.

A simple version of this test may consist of just TVOC (the total VOC emission), reported as its toluene equivalent. More advanced versions may compare individual TOC results with one or more limit values. The following list of limit values for LCI, CLI, NIK and CREL is used by the different indoor climate labels to evaluate VOC emissions in respect of the indoor climate[72].

As the different volatile substances have different limit values due to the difference in their harmful effect on health, it makes sense that the tested substances are not weighted equally. For this reason, several indoor climate labelling schemes do not only have a limit value for TVOC but also specific limit values called LCI values (LCI= Lowest concentration of interest) for individual substances. Efforts are currently ongoing at the international level to develop international limit values (LCI= Lowest concentration of interest). This will enable the different indoor climate labelling schemes to have the same reference values and make them more comparable. However, no date has been set for when these values are expected to be ready.

M1 (Finnish indoor climate labelling scheme)
The Finnish indoor climate labelling scheme (M1) was developed by the Finnish Society of Indoor Air Quality and Climate (FiSIAQ) in 1995. M1 uses the ISO 16000 series and lays down requirements for the following emissions: TVOC, formaldehyde, ammonia, carcinogens and odour. Emission class M1 corresponds to the best quality while emission class M3 covers materials with the highest emission rates. Classified materials must fulfil the criteria 28 days after production.

Danish Indoor Climate Labelling Scheme
The Danish Indoor Climate Labelling Scheme also uses EN ISO 16000 as a basis for the scheme. It lays down requirements for having analyses carried out until the emission rate converted to concentration in a standard room is below half of the irritation threshold (IT) for the individual substances, with the limit value taken from VOCBase (Jensen. B, 1996). It assesses the results in relation to the surface area of the product in contact with the room air, cf. Danish Indoor Climate Label definition of a standard room for the product type in question. The time value measured must be lower than or equal to a predetermined limit value, cf. VOCBase for the specific product type, in order to receive the Indoor Climate Label. Currently, Danish Indoor Climate Labelling uses limit values from VOCBase, which is a Danish database[73], but is mainly based on international limit values. However, the database is not being updated, as Danish Indoor Climate Labelling awaits the international LCI values. In addition, Danish Indoor Climate Labelling lays down requirements for carcinogens, a requirement of max. 75 $\mu g/m^3$ formaldehyde emission (after 60 days) and an odour test.

[72] http://www.eurofins.com/product-testing-services/services/testing/safety---chemicalelectricalfire/chemical-safety/voc-emissions-into-indoor-air/indoor-air-limit-values-.aspx visited on 21/8 2012
[73] Jensen, B. and Wolkoff, P. VOCBASE, 1996

AgBB
AgBB (Committee for Health-Related Evaluation of Building Products) is a German indoor climate labelling scheme for building products, with a focus on volatile organic compounds. This uses LCI (Lowest Concentration of Interest) values as one of its parameters for health-related evaluation of emissions of individual substances from building materials.

The LCI values from AgBB are updated approximately every two years and are based on OEL values (Occupational Exposure Limits)[74]. The latest list dates from 2012 and is available on http://www.umweltbundesamt.de/produkte-e/bauprodukte/agbb.htm .

This lays down requirements for substances such as TVOC, SVOC, selected carcinogenic VOCs, aldehydes and substances with LCI values.

AFSSET (now ANSES)
The French AFSSET Agency (now called ANSES) developed the AFSSET Protocol 2009 guideline to limit VOC emissions in indoor air. The test method used is ISO 16000 (parts 3, 6, 9, 10 and 11). AFSSET 2009 can be used for many different building products, and requirements are laid down for the following emissions:

- Carcinogens after 3 and 28 days
- Formaldehyde limit
- Total VOC (TVOC) after 3 and 28 days
- VOC with a defined CLI limit value after 28 days (some 160 limit values are specified)

There is no official "AFSSET" label, as these are only guidelines, and it is important not to confuse these guidelines for the French rules for VOC emissions (A+).

Harmonisation of indoor climate labelling schemes in EU
In 2010, the European Collaborative Action (ECA) prepared a "draft report", Report No 27, Harmonisation framework for indoor material labelling schemes in the EU. The report is available here:
http://www.eurofins.com/media/1744366/ECA_report_no_27_final%20draft.pdf

The report gives the following summary of important European indoor climate labelling schemes for building products:

[74] Harmonisation framework for indoor material labelling schemes in the EU, ECA Report no. 27, 2010.

Table 4. Consensus reached for the measurement methods, the core and the optional criteria

Requirements / Parameter	M1 Finland	DICL Denmark	AgBB Germany	AFSSET France	Consensus
Measuring method / Chamber	ISO 16000 series	ISO 16000 series	ISO 16000 series	ISO 16000 series	Harmonised CEN Standard (based on ISO 16000 series)
Measuring points (days)	28	3, 10 and 28	3 and 28	3 and 28	3 and 28
Core criteria					
Single VOCs evaluated (R = ∑ Ci/LCI <1))	No	comparison with irritation threshold	R < 1 165 LCIs (2010)	R < 1 164 LCIs (2009)	R < 1 Harmonised list of LCIs
Carcinogens evaluated according to Concentration admitted	IARC class 1 SERa < 5 µg/m²h	IARC class 1	EU classes 1 and 2 56 listed compounds Sum < 1 µg/m³	EU classes 1 and 2 2 listed compounds < 1 µg/m³	Harmonised list of EU carcinogens classes 1 and 2 compounds to be checked
TVOC measured	SERa < 200 µg/m²h	No	1000 µg/m³	1000 µg/m³	200-1000 µg/m³
Formaldehyde measured	SERa < 50 µg/m²h	75 µg/m³ (after 60 days)	No[1]	10 µg/m³ (LCI)	Value to be discussed
Optional criteria					
Compounds without LCI assessment	No	No	Sum < 100 µg/m³	Sum < 100 µg/m³	Sum < 100 µg/m³
Other compounds evaluated	Ammonia				
TSVOC measured	No	No	< 100 µg/m³	No	Await validation TC 351
Sensory evaluation	Acceptability untrained panel 15 persons	Acceptability and intensity;untrained panel 20 persons	No (Draft for intensity measurement developed)	No	Await ISO 16000-28

[1] Fomaldehyde measurement required for approval application at DIBt

The report describes the consensus achieved for a harmonised framework for labelling schemes in Europe. The work was carried out by representatives of Danish Indoor Climate Labelling (DIM), the Finnish (M1) indoor climate labelling scheme and the German and French evaluation systems for indoor climate (AgBB and AFSSET respectively). The framework in the final column above summarises the important shared criteria for testing and evaluation methods for the indoor climate test.

The plan is that the various indoor climate labelling schemes will work towards making their schemes resemble the consensus reached in ECA Report no. 27. However, no progress can be made without the common LCI values. In principle, Danish Indoor Climate Labelling could easily make some of the other changes, such as introducing a TVOC requirement, but they do not wish to make a mass of small changes to their criteria and are therefore awaiting the common LCI values before taking action.

At the same time, in relation to CE marking, work is progressing on a horizontal standard for release of gases from building products (TS16516). The idea is that when it is finished it must be implemented in the different product standards in relation to the CE marking of building products (this will be done over several years). This test standard should also be of use with regard to the recommended indoor climate parameters in Report no. 27. But for the time being, the ISO 16000 series is used[75].

CARB Phase 2 certificate

Apart from the E1 certificates, the CARB Phase 2 certificate is often used for formaldehyde emissions from wood-based construction panels. California Air Resources Board (CARB) issues third-party verified certificates for various types of wood panels. These require a formaldehyde test in accordance with standards ASTM E1333 or ASTM D6007.

[75] Telephone conversation with Thomas Witterseh from Danish Indoor Climate Labelling on 6/8 2013

LEED system for Indoor environmental quality
In LEED projects outside North America, testing and evaluation is may be carried out with the CDPH standard method or the German AgBB Testing and Evaluation Scheme (2010) 15 together with ISO 16000 parts 3, 6, 9 and 11 or the DIBt test method, or the 2013 implementation of CEN/TC351 is acceptable. American projects must follow the CDPH standard method. TVOC is measured after 14 days under the CDHP standard method.

In the following intervals: less than or equal to 0.5 mg/m^3, between 0.5 and 5.0 mg/m^3, greater than or equal to 5.0 mg/m^3. Products which in principle do not emit VOC sources - especially stone, ceramics, powder-coated metals, coated metal or anodised metals, glass, concrete, light brick and unfinished/untreated solid timber, are regarded as fully compatible without a VOC emissions test, unless they contain integral organically-based surface coatings, binders or jointing compounds.

BREEAM NOR
For wood-based construction panels, BREEAM in Norway lays down emission requirements in the form of an E1 formaldehyde test (EN 717-1), and also that the VOC emission must comply with the values of Annex C of standard EN 15251 (2007 version), which is identical with the Finnish M1 labelling scheme. Here requirement levels for "low-pollutant materials" and "extremely low-pollutant materials" are given for the following compounds: TVOC, formaldehyde, ammonia, carcinogenic compounds (IARC) and odour. The requirement levels are given in mg/m^2h[76].

Raw materials labelling and traceability systems
Within the construction panels product group, sustainability labels for wood are of particular relevance. There are certifiable forestry standards such as PEFC and FSC, as referred to by Nordic Ecolabelling (but with a requirement for national implementation of the standard), in all the criteria for which sustainable wood raw materials are relevant. Bamboo may either be certified under a standard for sustainable forestry or as organically cultivated.

[76] http://www.eurofins.com/product-testing-services/information/sustainable-buildings/breeam/breeam-norway.aspx