CEPE position paper on

27 March 2013

Definition.
According to the Directive 2004/42/CE (Deco paint directive), “Volatile Organic Compound (VOC) means any organic compound having an initial boiling point less than or equal to 250 °C measured at a standard pressure of 101,3 kPa.”

Background and reasons.
With the increasing concerns for the environment and the implementation of the Deco paint directive, the paint producers tend to compete for the lowest VOC content in their products. VOC claims should be based on the ISO method 11890-2 (for VOC contents below 15%, see Appendix III of the Deco paint directive), allowing a fair comparison of different paints.

‘Zero VOC’ is not supported by CEPE as ‘Zero’ legally means that no VOC should be found at all. Although the paint producer will not intentionally add VOCs to his formulation, VOCs may enter the formulation in low quantities via the supplier’s process or by downstream distributors. For example:
- Paint ingredients that have used VOCs in their production process may bring in traces of VOC. For example, chalk is washed or grinded with VOC, so even after it has completely dried, traces of VOC can still be found, and incorporated in the paint.
- Binders and additives may contain traces of VOC in their delivery form.
- The addition of tinting paste at the distributor or paint shop may also bring in some amounts of VOC.

Based on this, CEPE believes it better to avoid any potential challenge on “zero VOC” claims, which may affect the reputation or credibility of the industry, or be misleading to the user of the product.

CEPE position
As “zero VOC” can be seen as misleading, CEPE discourages its members to use ‘Zero VOC’ claims in their advertising and labeling of Decorative paints.

Remark: In the US, the authorities have already won a case against a “zero VOC” claim.