



## Expectation from a consumer NGO

# What is needed for healthy buildings in the EU – the product perspective

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# ANEC analysis of legal environment



## Materials releasing substances to indoor air:

A priority area in ANEC [strategy](#) for enhancing EU legislation on **hazardous chemicals in consumer products.**



- **CPR** inadequate to establish **performance requirements for construction products**
- **GPSD** not allowing **limits for chemicals in products** either...
- **REACH is no alternative** – extremely laborious process based on case-by-case risk assessment, no sum parameters (e.g. TVOC), no group restrictions (e.g. CMR)

→ **\*lack of a suitable regulatory framework\***

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## ANEC Recommends:



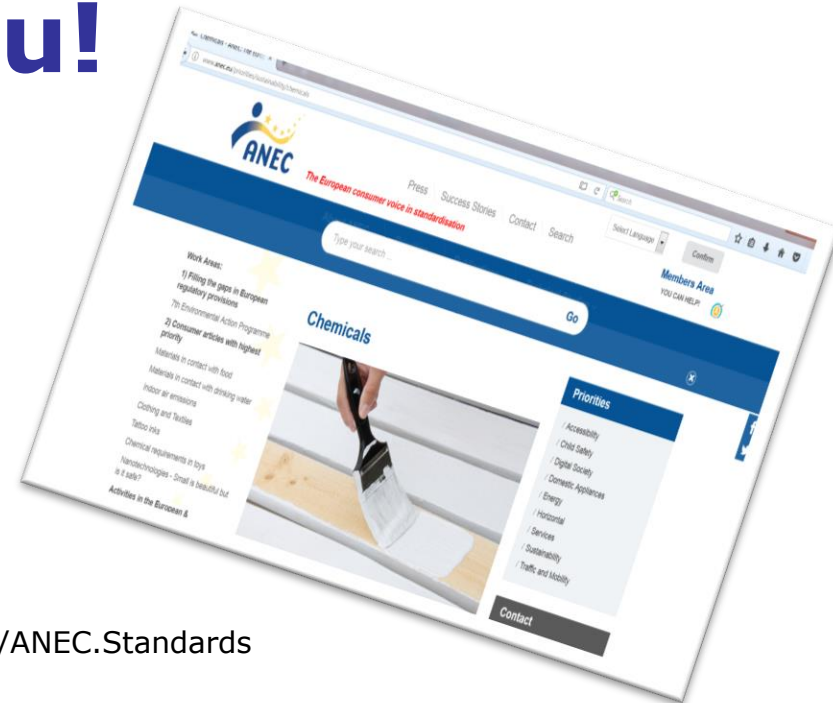
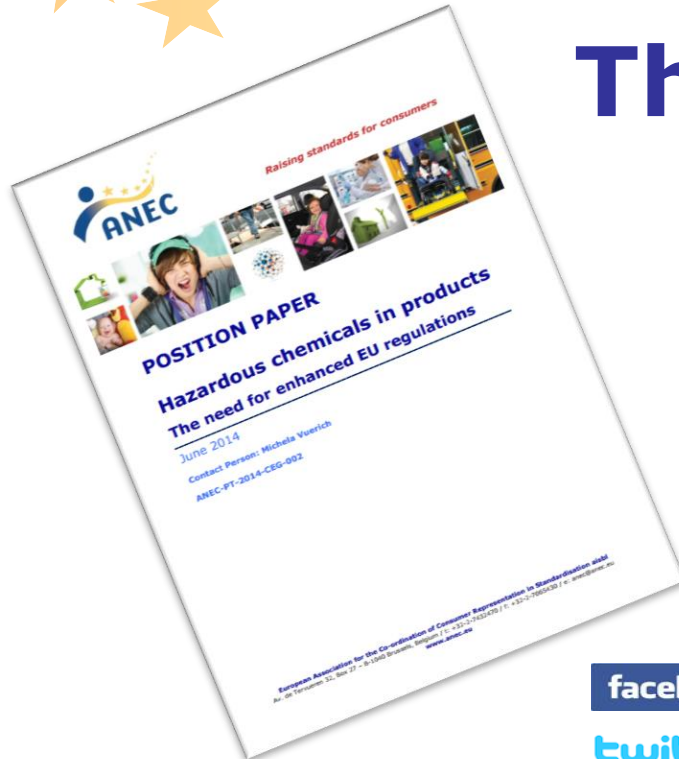
- A **new regulatory framework** to set **harmonised performance requirements** with clear pass/fail criteria for all products and materials (*CPs as floor & wall coverings, adhesives,... but also home textiles, air fresheners...*) which can release substances to the indoor air
- Based on German **AgBB** scheme, Belgian rules & **ECA reports** → **UBA's views on classification as first step.**
- Including a fast and flexible procedure - such as **Delegated Acts** – for **adoption or modification of limits** for chemicals in products that release substances into indoor air

# Principles required in new regulation:



- **TVOC limits (SVOC/VVOCs later)**
- **exclusion of volatile CMR substances**
- **LCI (Lowest Concentration of Interest) values to be set/harmonised** (available and future)
- **sensory evaluation** (ISO 16000-28)
- **emission measurement test chamber 3 and 28 days** (ISO 16000, EN 16516)
- **separate requirements and test method for certain other products** (e.g. air fresheners)
- **Same approach for Ecolabel with lower limits** (~Blue Angel)

# Thank You!



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