|  |  |  |
| --- | --- | --- |
| **Annex 1 to the contract pursuant to DE-UZ 221**  **Environmental Label for**  **“Underwater Coatings and Other Antifouling Systems”** |  | **Please use this**  **printed form!** |

Manufacturer (licence holder):

Distributor (label user):

Product designation:

**The above-named product is a:**

|  |  |  |  |
| --- | --- | --- | --- |
| Coating |  | Ultrasonic system |  |
| Adhesive film |  | Boat lifting system |  |
| Cleanable hard coating |  | Mobile ship cleaning equipment |  |
| Electrical process with a special coating structure |  | Stationary ship cleaning equipment |  |
| Underwater tarpaulin |  |  |  |

**Declarations by the applicant**

We hereby declare compliance with the following requirements

|  |  |  |
| --- | --- | --- |
| **Paragraph** | **Applies to** | **Requirement** |
| **3.1.1** | **General requirements** | |
|  | ALL | The ready-to-use product and the primary products may not contain any substances with the following properties in a concentration > 0.1 % by mass:  1. Substances which are identified as particularly alarming under the REACH Regulation and which have been incorporated into the list drawn up in accordance with Article 59, Paragraph 1 of the REACH Regulation (so-called “list of candidates”[[1]](#footnote-1)).  2. Substances that according to the CLP Regulation have been classified in the following hazard categories or which meet the criteria for such classification[[2]](#footnote-2):   * carcinogenic in categories Carc. 1A or Carc. 1B or Carc. 2 * germ cell mutagenic in categories Muta. 1A or Muta. 1B or Muta. 2; * reprotoxic (teratogenic) in categories Repr. 1A or Repr. 1B or Repr. 2; * acute toxicity (poisonous) in categories Acute Tox. 1 or Acute Tox. 2 or Acute Tox. 3 * hazardous to the ozone layer in category Ozone 1.   The hazard statements (H Phrases) that correspond to the hazard categories can be found in Appendix E  3. Substances that are classified in TRGS 905 as:   * carcinogenic (K1A, K1B, K2) * germ cell mutagenic (M1A, M1B, M2) * reprotoxic (RF1A, RF1B, RF2) * teratogenic (RD1A, RD1B, RD2) |
| **3.1.2** | **Requirements on the use of biocides** | |
|  | Coatings and adhesive films, cleanable hard coatings, electrical processes with a special coating structure,  underwater tarpaulins,  mobile ship cleaning equipment,  stationary ship cleaning equipment | The use of biocides according to Directive (EU) No 528/2012 in the products and primary products is prohibited. As an exception to this rule, the primary products may contain in-can preservatives (PA 6) if the requirements for the classification of the product in 3.2.1 are observed. |
| **3.1.3** | **Requirements with respect to volatile organic compounds (VOC)** | |
|  | Coatings and adhesive films, cleanable hard coatings,  electrical processes with a special coating structure | For underwater coatings, the following maximum allowable content of volatile organic compounds applies:   * a VOC limit of 100 g/L for water-based products and 250 g/L for solvent-based products.[[3]](#footnote-3)   or   * an area-based total consumption for all applied layers of 150 g/m2.[[4]](#footnote-4) |
| **3.1.4** | **Special requirements for specific substances** | |
|  | Coatings and adhesive films, cleanable hard coatings, electrical processes with a special coating structure,  underwater tarpaulins,  mobile ship cleaning equipment,  stationary ship cleaning equipment | Pigments and siccatives  Pigments or siccatives containing lead compounds may not be added to the underwater coatings or plastics. Exempted are natural and production-related impurities of up to 200 ppm which may be contained with the pigment.  Alkylphenol ethoxylates  Products containing alkylphenol ethoxylates (APEO) and/or their derivatives may not be added to the underwater coatings or plastics. This rule also applies to primary products.  Plasticisers  Products that contain plasticising substances from the group of phthalates or group of organophosphates may not be added to the underwater coatings or plastics. The same also applies to primary products.  Oximes  Oximes and primary products containing oximes may not be added to the products.  Perfluorinated and polyfluorinated chemicals  Perfluorinated or polyfluorinated chemicals (PFAS), such as fluorocarbon resins and fluorocarbon emulsions, perfluorinated surfactants, perfluorinated sulfonic and carboxylic acids may not be added to the product. The use of polytetrafluoroethylene (PTFE) is also prohibited.  PVC  The use of the plastic polyvinyl chloride (PVC) is not permitted.  Organotin compounds  The use of organotin compounds is not permitted.  Copper as a catalyst  The use of copper as a catalyst in silicone coatings is only permitted if the requirements for the classification of the product in 3.2.1 are observed.  Zinc oxide  The use of zinc oxide as an auxiliary agent (e.g. pigment, UV absorber, catalyst) is only permitted if the requirements for the classification of the product in 3.2.1 are observed.  Expoxy resin  The use of synthetic resins based on bisphenol A or similar bisphenol compounds is not permitted.  Nanomaterials  The use of nanomaterials is not permitted. |
| **3.1.5** | **Intended release of substances** | |
|  | Coatings and adhesive films, cleanable hard coatings,  electrical processes with a special coating structure,  underwater tarpaulins | Plastics  The intended release of plastics (such as microplastics) is not permitted. Eroding and self-polishing coatings are thus explicitly prohibited.  Silicone oils  The use of silicone oils, which are designed to exude from coatings, is prohibited. Silicone oils that are approved for use in materials that come into contact with foodstuffs or which are classified as harmless to drinking water are exempt from this general ban on the use of silicone oils.[[5]](#footnote-5) [[6]](#footnote-6)  Natural substances  The release of natural substances, which have not been chemically modified, such as waxes or greases with the aim of achieving a non-stick effect is generally only permitted if no polymer matrices are also released, as is the case with self-polishing or eroding coatings. The German Environment Agency will make a decision on whether the intended release of natural substances is permitted in each individual case. |
| **3.2.4** | **Special system-specific requirements** | |
|  | Boat lifting systems,  mobile ship cleaning equipment,  stationary ship cleaning equipment | **Boat lifting systems**  Floating systems can only be certified with the Blue Angel if the floating element is not coated with an antifouling coating containing biocides.  **Mobile ship cleaning equipment**  The equipment must have collection and filtration systems to sufficiently retain the cleaned fouling so that they do not pollute the body of water. The filtrate and the filter cake must be disposed of professionally. Any additional general or local regulations must also be observed.  The applicant must verify that 95 % of the fouling is collected and not released into the body of water.  **Stationary ship cleaning equipment**  The equipment must have collection and filtration systems to sufficiently retain the cleaned fouling so that they do not pollute the body of water. The filtrate and the filter cake must be disposed of professionally. Any additional general or local regulations must also be observed.  The applicant must verify that 95 % of the fouling is collected and not released into the body of water. |
| **3.3** | **Advertising messages** | |
|  | ALL | The type of underwater coating or antifouling system must be stated in combination with the product designation in a suitable location on the container or packaging.  Advertising messages must not include claims in the sense of Article 25 (4) of the CLP Regulation (EC) No. 1272/2008) that could play down the risks such as e.g. “non-toxic”, “non-harmful to health” or similar claims.  Advertising messages that contain terms such as “Bio”, “Eco”, “Natural” or “Nano” etc. as part of the name or description are not permitted. |
| **3.4** | **Consumer information** | |
|  | ALL | The applicant must enclose the product information that is designed to guarantee the safe use of the product and which contains all important information on the operation and use of the product. The system-specific requirements in Paragraphs 3.4.1 to 3.4.3 also apply. A note must be added to the product to indicate that this product may only be used on the exterior of the hull.  **Coatings**  The main components of the coating system must be stated on the container and in the technical data sheet. If the product is a multi-layer system, all of the layers must be named. In addition to the obligatory P-phrases in accordance with the CLP Regulation (EC) No. 1272/2008, the following must also be stated in an easy to read form (comparable wording / P-phrases are permitted):  • “Keep out of the reach of children”  • “Ensure good ventilation during application and drying”  • “Do not eat, drink or smoke when applying this product”  • “In case of contact with skin or eyes, rinse immediately with plenty of water”  • “Dispose of the contents/container in accordance with the local regulations for waste disposal”  **Cleanable hard coatings**  Information must be included with the cleanable hard coatings to explain that these coatings are only effective in combination with regular cleaning. In addition, these products must include recommendations for cleaning intervals and suitable cleaning processes in different types of water and for different activity profiles. The information should include a recommendation that a control panel is hung at the mooring so that the extent of the fouling can be observed more easily.  **Mobile ship cleaning equipment and stationary ship cleaning equipment**  A clearly legible note must be displayed in a suitable location to indicate that the use of the cleaning process with antifouling coatings containing biocides is prohibited in Germany without approval from the relevant authorities because environmentally damaging biocides could be released into the body of water.  The note must also indicate that removal of fouling in the water is not permitted if the removed fouling cannot be collected and properly disposed of and if the cleaning water is not purified using suitable treatment processes.  The mobile ship cleaning equipment must be sold together with a cleaning guide that indicates in which types of water the equipment is effective and on what type of coatings the equipment works and also includes precise cleaning instructions and information on the different cleaning intervals depending on the type of water. In addition, the guide should include instructions for maintaining a reporting log in which the dates, locations and number of cleaning processes can be documented. Furthermore, the guide should recommend that additional test panels are hung at the mooring so that the fouling on the test panel can be used to assess whether the ship needs to be cleaned. |

1. The version of the list of candidates at the time of application is valid. It can be found at: <https://www.echa.europa.eu/candidate-list-table>. [↑](#footnote-ref-1)
2. The harmonized classifications and labellings of hazardous substances can be found in Annex VI, Part 3 of the CLP Regulation. Furthermore, a comprehensive classification and labelling inventory, which also includes all of the self-classifications of hazardous substances made by manufacturers, has been made available to the public on the website of the European Chemicals Agency: <https://echa.europa.eu/de/regulations/clp/cl-inventory>. [↑](#footnote-ref-2)
3. Based on ChemVOCFarbV (2004), which contains VOC limits of 130 g/L (water-based) and 300 g/L (solvent-based) for coatings for wood, metal or plastic. [↑](#footnote-ref-3)
4. Calculated using typical product formulations and their VOC content and application volumes. [↑](#footnote-ref-4)
5. Database “BfR Recommendations on Food Contact Materials”: XV. Silicone. Version as of 01/06/2019 <https://bfr.ble.de/kse/faces/DBEmpfehlung.jsp> (accessed on 07/09/2020) [↑](#footnote-ref-5)
6. <https://www.umweltbundesamt.de/sites/default/files/medien/5620/dokumente/silikon-uebergangsempfehlung_2._aenderung.pdf> (accessed on 07/09/2020) [↑](#footnote-ref-6)