To consultative bodies

Your ref.	Our ref.	Date
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Proposal for Hearing on Revised Criteria for Nordic Ecolabelling of Durable Wood

Nordic Ecolabelling hearby invites you to comment on our proposal for the revised version 2.0 of criteria for Nordic Ecolabelling of **Durable Wood**. We would be grateful if you could submit your written feedback no later than September 5th 2014. The criteria and background documents can be downloaded from the following address:
http://www.svanemerket.no/aktuelt/miljokrav/holdbart_tre/

The proposed criteria have been prepared by representatives from Nordic Ecolabellings national offices under the leadership of Nordic product advisor Elisabeth Kolrud. Please contact the Norwegian office if you wish to receive a hard copy of the documents.

The main changes that are proposed are:

1. Changes in the product group definition. The most significant change is that this version opens up for the use of small amounts of biocides for impregnation with supercritical CO_2. This change results in the introduction of a maximum allowable limit of 200 g/m^3 wood for biocides in the requirement O3 and exceptions for certain classifications in requirements O4 and O5. Explainations for the proposed changes are provided in the background document under the requirements O3 and in Appendix 4.
2. Expansion of the classification requirements for chemical products (O4) from covering only health-related hazards to also including environmental hazards.
3. The introduction of three new chemical requirements (O5 to and including O7) concerning: a) prohibition of chemical substances classified as carcinogenic, mutagenic or toxic to reproduction, b) a prohibition list of problematic chemicals and c) prohibition of the use of nanoparticles.
4. The requirements for surface treatment have been removed. A new restriction is introduced in the product group definition, that surface treated wood (eg. painted or stained after modification) can not carry the Nordic Ecolabel.
5. The introduction of two new informative requirements regarding energy use in drying and production (O15) and transportation of wood (O16), and a requirement stating that the manufacturer must have a plan for energy efficiency in their production.



6. The introduction of a new requirement stating that durable wood shall not have to be disposed of as hazardous waste in any of the Nordic countries (O18)

7. Nordic Ecolabellings standard quality and regulatory requirements are introduced (O19-O26)

Nordic Ecolabelling are particulary interested in comments on the following points:

- The proposal to open up for the use of small amounts of biocides (number 1 in the list above). This will be a new direction for the criteria and it is therefore particularly important to receive comments on this suggestion.
- Chemical requirements (numbers 2 and 3 above). Are the requirements relevant and reasonable for the types of chemicals used for the treatment of durable wood?
- Removing the possibility for the manufacturer to surface treat the durable wood (number 4 above)
- Are the informative requirements for energy and transport clearly and appropriately written (number 5 above)?

We welcome your comments on the proposed new environmental requirements. The contact person in Norway is Kristian Kruse. We ask you to send your comments to us no later than **September 5th 2014** via the submission form on our website, by mail or email to **kk@svanemerket.no**.

A summary of consultation comments that are received will be available through the Nordic Ecolabel.

Best regards
Nordic Ecolabelling

Elisabeth Kolrud
Norwegian Product Manager

Attachments