

## Clarifying information on content declaration requirements

Documentation and reporting requirements in SundaHus are based on legal requirements, market standards (e.g. eBVD2015 requirements) and requirements from different certifications.

A key part of the documentation is the declaration of contents, which enables the assessment of potential health and environmental hazards both during the construction process and after the building is completed. It is also fundamental to promote resource-efficient renovation, reuse, and recycling of materials.

### What do the eBVD2015 requirements mean?

In simple terms, this means that all hazardous substances in a good must be declared when they are present at levels where a chemical mixture would be classified as hazardous according to CLP. Table 1 gives an overview of the relevant limit values. This means, for example, that if your product contains a substance classified as acute toxicity category 1 or 2, with hazard statement H300, you should declare this substance if it is present in your product at a level of more than 0.1 weight-%. However, any substance not classified as hazardous according to CLP should be declared if it is present in the product at levels higher than 2 weight-%.

Note that these content limits apply to chemical substances, not materials or components. Also bear in mind that this information may be difficult to obtain as EU law does not require substances in goods to be declared with this level of detail.

For more detailed information and guidance, you can find instructional documents on the [eBVD website](#).

Information on EU legislation on hazardous substances, hazard category and reporting requirements in goods can be found on the [website of the European Chemicals Agency \(ECHA\)](#) or on the [website of the Swedish Chemicals Agency](#).

### What is the difference between components, materials, and substances?

- **Component:** A part of a good that is used to construct a product as a whole. Examples of components are the motor and wheels in a motorized sliding gate or the cables and diffuser in a lighting fixture.
- **Material:** Goods and even components can be made of different materials. Example: a wheel made of polyamide plastic and stainless steel. A material such as polyamide plastic can be composed of different substances, such as the polymer Nylon 66, antioxidants, fillers, etc.
- **Substances:** A matter of constant composition in which atoms of the same or different elements are bound together by chemical bonds. It can be a chemical element (e.g. sulphur or gold) or a chemical compound in its natural state (e.g. water (H<sub>2</sub>O)) or a chemical compound resulting from a manufacturing process (e.g. formaldehyde). Chemical substances can often be identified by a CAS or EC number.

### Our advice on creating a content declaration

The information in Table 2 can serve as a guide when declaring which materials and which substances are included in your product. The table gives examples of what you need to consider for different common materials if they are included in your product. The table also shows when the declaration level of a material is acceptable and when we consider the material to be fully specified.

If the minimum requirements are met but the material is not fully specified, we use an appropriate default/worst-case for each respective material.

The content of our default/worst-case placeholders is based on what is usually present in the specific material. For example, our default/worst-case plastic placeholders contain common additives such as antioxidants, UV stabilizers and flame retardants.

### How will the level of detail in the content declaration affect my assessment?

A declaration of contents where at least 98% of the materials are specified at least at an approved level and where each material is indicated by weight percentage of the whole product weight can be assessed in SundaHus.

Products where more than 98% of the content is fully specified can achieve the documentation status "Full specification" in SundaHus.

Table 1: Overview of limit values for the declaration of substances in construction products

Hazard class and hazard category	Hazard statements	Category according to PRIO	Reporting limit (%)	Reference
<b>Unclassified substances</b>	-		≥2%	<i>All substances that are not classified as hazardous shall be reported when present in concentrations ≥2% according to eBVD2015 requirements.</i>
<b>Acute Tox. 1/2</b>	H300	Priority risk-reduction substance	≥0,1%	<i>Reporting limit:</i> CLP Regulation (EC) No 1272/2008, Annex I Table 1.1  <i>Classification limit:</i> CLP Regulation (EC) No 1907/2006, Annex I, Section 3.1.3.6 and Tables 3.1.1 & 3.1.2
	H310	Priority risk-reduction substance	≥0,1%	
	H330	Priority risk-reduction substance	≥0,1%	
<b>Acute Tox. 3</b>	H301		≥0,1%	*exception: the limit for classification is calculated as 0.025% which is less than the reporting limit, therefore the reporting limit is set as the limit for assessment with A
	H311		≥0,1%	
	H331		≥0,1%	
<b>Acute Tox. 4</b>	H302		≥1%	*exception: the limit for classification is calculated as 0.025% which is less than the reporting limit, therefore the reporting limit is set as the limit for assessment with A
	H312		≥1%	
	H332		≥1%	
<b>Skin Corr. 1, 1A, 1B, 1C</b>	H314		≥1%	<i>Reporting limit:</i> CLP Regulation (EC) No 1272/2008, Annex I Table 1.1  <i>Classification limit:</i> CLP Regulation (EC) No 1272/2008, Annex I table 3.2.3 & 3.2.4
<b>Skin Irrit. 2</b>	H315		≥1%	
<b>Eye Dam. 1</b>	H318		≥1%	<i>Reporting limit:</i> CLP Regulation (EC) No 1272/2008, Annex I Table 1.1
<b>Eye Irrit. 2</b>	H319		≥1%	

				<i>Classification limit:</i> CLP Regulation (EC) No 1272/2008, Annex I table 3.3.4
<b>Resp. Sens. 1/1B</b>	H334	Phase-out substance	≥0,1%	<i>Reporting limit and classification limit:</i> CLP Regulation (EC) No 1272/2008, Annex I, table 3.4.5 & 3.4.6
<b>Resp. Sens. 1A</b>	H334	Phase-out substance	≥0,01%	
<b>Skin Sens. 1/1B</b>	H317	Priority risk-reduction substance	≥0,1%	
<b>Skin Sens. 1A</b>	H317	Phase-out substance	≥0,01%	
<b>Muta. 1A/1B</b>	H340	Phase-out substance	≥0,1%	<i>Reporting limit and classification limit:</i> CLP Regulation (EC) No 1272/2008, Annex I, table 3.5.2
<b>Muta. 2</b>	H341	Priority risk-reduction substance	≥1%	
<b>Carc. 1A/1B</b>	H350	Phase-out substance	≥0,1%	<i>Reporting limit and classification limit:</i> CLP Regulation (EC) No 1272/2008, Annex I, table 3.6.2
<b>Carc. 2</b>	H351	Priority risk-reduction substance	≥0,1%	
<b>Repr. 1A/1B</b>	H360	Phase-out substance	≥0,1%	<i>Reporting limit and classification limit:</i> CLP Regulation (EC) No 1272/2008, Annex I, table 3.7.2
<b>Repr. 2</b>	H361	Priority risk-reduction substance	≥0,1%	
<b>Lact.</b>	H362	Priority risk-reduction substance	≥0,1%	
<b>STOT SE 1</b>	H370	Priority risk-reduction substance	≥1%	<i>Reporting limit and classification limit:</i> CLP Regulation (EC) No 1272/2008, Annex I, table 3.8.3
<b>STOT SE 2</b>	H371		≥1%	
<b>STOT SE 3</b>	H335, H336		≥1%	<i>Reporting limit:</i> CLP Regulation (EC) No 1272/2008, Annex I Table 1.1  <i>Classification limit:</i> CLP Regulation (EC) No 1272/2008, Annex I, Section 3.8.3.4.5
<b>STOT RE 1</b>	H372	Priority risk-reduction substance	≥1%	<i>Reporting limit and classification limit:</i> CLP Regulation (EC) No 1272/2008, Annex I, table 3.9.4
<b>STOT RE 2</b>	H373		≥1%	
<b>Endocrine disruptive substances, Cat 1<sup>1</sup></b>	EUH380 EUH430	Phase-out substance	≥0,1%	<i>Reporting limit and classification limit:</i> CLP Regulation (EC) No 1272/2008, Annex I, table 3.11.2

<sup>1</sup> Substances that have undergone an evaluation of their endocrine disrupting properties for health or the environment and that have been identified as endocrine disruptors within one of the following EU regulations; REACH Regulation (EC) No 1907/2006, the Biocidal Products Regulation, nr 528/2012, or the Plant Protection Products Regulation (EC) No 1107/2009

<b>ED HH1, ED ENV 1</b>				
<b>Endocrine disruptive substances, Cat 2<sup>2</sup> ED HH2, ED ENV 2</b>	EUH381 EUH431	Priority risk-reduction substance	≥0,1%	
<b>Asp. Tox.</b>	H304		≥10%	<i>Reporting limit and classification limit:</i> CLP Regulation (EC) No 1272/2008, Annex I, Section 3.10.3.3.1
<b>Aqua Acute 1</b>	H400		≥0,1%	<i>Reporting limit:</i> CLP Regulation (EC) No 1272/2008, Annex I Table 1.1  <i>Classification limit:</i> CLP Regulation (EC) No 1272/2008, Annex I, table 4.1.1
<b>Aquatic chronic 1</b>	H410	Priority risk-reduction substance	≥0,1% allmänt ≥0,001% för biocider	<i>Reporting limit:</i> CLP Regulation (EC) No 1272/2008, Annex I Table 1.1
<b>Aquatic chronic 2</b>	H411		≥1% ≥0,001% för biocider	<i>Classification limit:</i> CLP Regulation (EC) No 1272/2008, Annex I, table 4.1.2
<b>Aquatic chronic 3</b>	H412		≥1% ≥0,001% för biocider	Biocides are subject to specific reporting requirements, see the EU Biocidal Products Regulation, nr 528/2012, Article 58 & 69
<b>Aquatic chronic 4</b>	H413	Priority risk-reduction substance	≥1%	
<b>Ozone Cat. 1</b>	H420	Phase-out substance	≥0,1%	<i>Reporting limit and classification limit:</i> CLP Regulation (EC) No 1272/2008, Annex I, table 5.1
<b>PBT/vPvB<sup>3</sup></b>	EUH440 EUH441	Phase-out substance	≥0,1%	<i>Reporting limit and classification limit:</i> CLP Regulation (EC) No 1272/2008, Annex I, Section 4.3.3
<b>Potential PBT/vPvB<sup>4</sup></b>		Priority risk-reduction substance	≥0,1%	In order to follow up the outcome of the evaluations, the reporting limit for potential PBT/vPvBs is set at the same level as for substances classified as PBT/vPvB.
<b>PMT/vPvM</b>	EUH450 EUH451	Phase-out substance	≥0,1%	There is no definition of MRLs in the current CLP Regulation. SundaHus

<sup>2</sup> Substances suspected of possible endocrine disrupting properties. These may be substances that are currently being evaluated in an EU legislative process, for example through inclusion on the CoRAP list. These substances are covered by ED List II. In addition, we include substances on ED list III as well as substances on the SIN list that are suspected of being endocrine disruptors without being classified as endocrine disruptors under EU legislation.

<sup>3</sup> Substances that meet the criteria for classification as PBT/vPvB according to the CLP Regulation (EC) No 1272/2008, and that have undergone an evaluation of their endocrine disrupting properties for health or the environment and that have been identified as endocrine disruptors within one of the following EU regulations; REACH Regulation (EC) No 1907/2006, the Biocidal Products Regulation (EC) No 528/2012 or the Plant Protection Products Regulation (EC) No 1107/2009. This corresponds to substances included in ED list 1

<sup>4</sup> Substances that meet the screening criteria for PBT/vPvB identification according to Annex XIII, REACH Regulation (EC) No 1907/2006, and substances under evaluation for PBT/vPvB. This corresponds to substances included in ED lists II and III as well as substances on ChemSec's SIN list that are not covered by ED list I.

				limit values are defined by reference to limit values for PBT/vPvB substances.
<b>PFAS</b>		Phase-out substance	≥0,1%	Under current legislation, several PFAS substances are included in the ECHAS candidate list, which means a reporting limit of 0.1%.
<b>Cadmium and its compounds</b>		Phase-out substance	≥0,001% <sup>5</sup>	<i>Limit values for assessment in line with: REACH Regulation (EC) No 1907/2006, Annex XVII</i>  Directive 2011/65/EU of the European Parliament and Council on the restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS)
<b>Mercury and its compounds</b>		Phase-out substance	≥0,0025%	<i>Reporting and assessment limit derived from regulations applicable to mercury-containing light sources under: Regulation EU 2017/852 of the European Parliament and Council on mercury</i>  and  Directive 2011/65/EU of the European Parliament and Council on the restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS)
<b>Lead and its compounds</b>		Phase-out substance	≥0,01% <sup>6</sup>	Directive 2011/65/EU of the European Parliament and Council on the restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS)
<b>Fluorinated greenhouse gases</b>		Phase-out substance	≥0,1%	<i>Limit values for reporting and assessment in SundaHus in line with common limit values for Phase-out substances.</i>  For information on EU requirements for products containing fluorinated greenhouse gases, please refer to the EU Regulation on fluorinated greenhouse gases (EU 517/2014)

Table 2: Examples of reporting level for common materials

<sup>5</sup> The reporting limit for this substance group applies per homogeneous material, not per product, in line with the provisions of the RoHS Directive. For more information, please refer to Directive 2011/65/EU (RoHS)

<sup>6</sup> The reporting limit for this substance group applies per homogeneous material, not per product, in line with the provisions of the RoHS Directive. For more information please refer to Directive 2011/65/EU (RoHS)

<b>Material</b>	<b>Unsatisfactory level of reporting</b> <i>The main content, chemical nature and basic physical properties of the material cannot be identified.</i>	<b>Acceptable level of reporting</b> <i>The main content, chemical nature and basic physical properties of the material can be identified at a fundamental level.</i>	<b>Full specification</b> <i>The main content, chemical composition and basic physical properties of the material can be identified at a detailed level.</i>
<b>Concrete</b>	<p>Generic descriptions</p> <p>E.g. "cement", "cement mix"</p>	<p>Materials can be identified, i.e. it is possible to distinguish between the substance "cement" and the material mixture "concrete".</p> <p>E.g. "concrete"</p> <p>Any reinforcement and the weight percentage of this is reported.</p>	<p>Specific composition can be identified.</p> <p>Binders (e.g. Portland cement, aluminate cement), fillers (e.g. gravel, fly ash, sand, styrofoam), polymer additives (e.g. polyvinyl acetate or SBR for strength, lignosulphonate as a flow additive), defoamers (e.g. polysiloxanes), accelerators (e.g. calcium nitrate), retarders (e.g. phosphate) are reported by quantity.</p> <p>Any steel reinforcement is reported by specifying the steel grade, e.g. "K500C-T", "stainless steel EN 1.4436"</p>
<b>Glass</b>	<p>Generic descriptions</p> <p>E.g. "SiO<sub>2</sub>", "Silicon dioxide"</p>	<p>Basic composition can be identified</p> <p>E.g. "glass"</p> <p>For laminated glass, the material and quantity of the laminate shall be specified.</p> <p>E.g. "laminated glass: 98% float glass + 2% polyvinyl butyral (PVB)"</p>	<p>Specific composition can be identified.</p> <p>E.g. "Silicate glass"/"Soda glass" (standard glass), "Butyl glass", "Potash glass", "Borosilicate glass", "Aluminosilicate glass"</p> <p>For laminated glass, the material and quantity of the laminate shall be specified.</p> <p>Any laminate material fulfils the full specification requirements for plastics contained in goods, see below.</p> <p>Any coatings are reported by specifying the type of coating. E.g. "low-e coating", "UV protection", "self-cleaning coating"</p>

<p><b>Chemical products as components in goods</b></p>	<p>Generic descriptions E.g. "glue", "paint", adhesive</p>	<p>Information on additives is incomplete but meets the requirements of eBVD 2015.  E.g. "PVAc glue", "Acrylic paint", MUF glue, "Epoxy-polyester powder coating"  <i>Some additives, e.g. biocides or flame retardants, may be covered by the requirements in Table 1.</i>  <i>We recommend supplement the declaration with a safety data sheet and SVHC certificate for all chemical products included.</i></p>	<p>All functional additives present at levels &gt;0.01% are specified and indicated by CAS or EC number.  E.g. biocides, pigments, accelerators/hardeners, fillers, tackifiers, UV stabilizers, antioxidants, flame retardants  Safety data sheets shall be provided for all constituent chemical products.</p>
<p><b>Ceramic products</b></p>	<p>Generic descriptions E.g. "ceramic", "brick", "tile"</p>	<p>The input material and its quantity can be identified.  E.g. for bricks: "85 weight-% clay, 10 weight-% sand and 5 weight-% sawdust"  Any surface treatment and weight-% of this is reported.  E.g. "glaze", "enameling"</p>	<p>The input material and its quantity can be identified.  E.g. for bricks: "85 weight-% clay, 10 weight-% sand and 5 weight-% sawdust"  Any surface treatment meets the full specification requirements for chemical products contained in goods, see above.</p>
<p><b>Metal alloys</b></p>	<p>Generic descriptions E.g. metal, "iron" for steel  Avoid reporting the individual elements e.g. "iron, nickel, chromium, zinc,..." contained in the metal.</p>	<p>Alloy type can be identified but alloy number is missing.  E.g. "Stainless steel", "Brass", "Aluminum".</p>	<p>Reporting by alloy number according to one of the following alloy standards: EN, UNS or AISI  E.g. "stainless steel EN 1.4003", "stainless steel AISI (UNS) 410S", "stainless steel X2CrNi12"</p>
<p><b>Metallic surface treatments</b></p>	<p>Generic descriptions E.g. "coated", "passivated"</p>	<p>Any surface treatment can be identified.  Possible surface treatments are indicated. E.g. "zinc plating", "nickel plating", "chrome plating"  <i>We recommend that the thickness/weight % of the surface treatment is stated. Otherwise, we will assume default.</i></p>	<p>See Acceptable level of reporting</p>

<p><b>Paper</b></p>	<p>Unspecific description E.g. "cellulose"</p>	<p>Materials can be identified. Information on additives is incomplete but meets the requirements of eBVD 2015. E.g. "paper", "recycled paper"</p>	<p>Specific composition can be identified. Binders (e.g. starch), structurants (e.g. lime) and additives (e.g. aluminum sulphate) are reported by quantity.</p>
<p><b>Plastic/rubber</b></p>	<p>Generic descriptions E.g. "plastic", "polyurethane", "polyolefin" or "rubber"</p>	<p>Information on additives is incomplete but meets the requirements of eBVD 2015. E.g. "plasticized PVC", "hard polyethylene plastic (HDPE)", "flexible polyurethane foam", "thermoplastic polyurethane (TPU)", "EPDM rubber"  <i>Some additives, such as plasticizers or flame retardants, may be subject to the requirements of Table 1.</i>  <i>We recommend supplement the declaration with an SVHC certificate for each plastic material.</i></p>	<p>All functional additives present at levels &gt;0.01% are specified and indicated by CAS or EC number.  E.g. UV stabilizers, antioxidants, flame retardants, plasticizers, heat stabilizers, accelerators, vulcanizers, pigments, fillers, biocides.</p>
<p><b>Sand/clay/gravel (naturally occurring material)</b></p>	<p>Generic descriptions E.g. "inorganic material", "mineral filler"</p>	<p>Material can be identified. E.g. "sand", "clay", "gravel"</p>	<p>See Acceptable level of reporting</p>
<p><b>Wood</b></p>	<p>Generic descriptions E.g. "wood", "treated wood", "impregnated wood, NTR A", "oil-treated wood"</p>	<p>Any treatment must be accounted for separately and meet the requirements for the approved level of accounting for chemical products contained in articles, see above.  E.g. "wood treated with 10% by weight of naphtha-based wood oil", "untreated wood"  <i>We recommend supplementing the report with a safety data sheet and SVHC certificate for all chemical products included.</i></p>	<p>Specific wood species can be identified. Any treatment meets the requirements for full specification for chemical products contained in articles, see above.  E.g. "pine", "birch", "spruce/pine"</p>