



PAINTMAN

NEW ZEALAND PAINT MANUFACTURERS ASSOCIATION INCORPORATED

18 May 2020

Dr John Skerrit
Department of Health
Sirius Building
23 Furzer Street
Canberra, ACT 2606
AUSTRALIA

Dear Dr Skerrit

Consultation: Proposed amendments to the Poisons Standard - ACMS and Joint ACMS/ACCS meetings, June 2020 – 2.4 Isothiazolinones

SUMMARY

The New Zealand Paint Manufacturers Association (NZPMA) welcomes the opportunity to comment on the proposed amendments to the Poisons Standard for isothiazolinones.

The New Zealand Paint Manufacturers Association does **NOT** support the 2. Proposed amendments referred for scheduling advice to the Joint ACMS-ACCS #25, section 2.4 Isothiazolinones

We also support the submission by the Australian Paint Manufacturers Federation.

BACKGROUND TO NZPMA AND THE PAINT AND COATINGS INDUSTRY

The NZPMA seeks to promote, aid, foster, develop and protect the interests of the paint industry in New Zealand. As New Zealand both imports and exports Paint and Coatings to and from Australia, changes such as the ones proposed impacts the industry in both countries, as well as the public impression of our products.

The NZPMA also works closely with the Australian Paint Manufacturers Federation, as well as other International Associations.

Virtually every man-made product or structure has a coating. Architectural paints and coatings are used to enhance the aesthetic of and to protect homes and other buildings. Specialty paints and coatings include the high-performance products that protect bridges, the electricity grid, telecommunication networks; and many other structures. Industrial coatings are typically factory-applied and include finishes on medical equipment, food service products like cans, jars and packaging, transportation equipment, paper, metal building products and much more.

Coatings provide additional and much needed performance characteristics to the finished product, providing protection from degradation like corrosion, abrasion, high or low temperatures, chemicals and ultraviolet rays, moisture, and microbes, among a host of aggressive or destructive conditions.

PROPOSED AMENDMENT TO 2.4 ISOTHIAZOLINONES

Isothiazolinones play an important role as a preservative and active biocide in paints and coatings, ensuring their longevity prior to application. OIT also gives mildew and algicide properties. They perform a similar function in many other products, including adhesives, cleaners, polishes, anti-mould sprays, inkjet printer inks, marker pens, cutting fluids, coolants, caulks and sealants.

In the context of paints and coatings the use of isothiazolinones has been critical in the shift from solvent-based paints to water-based alternatives, reducing VOC levels.

The NZPMA believes that the current poison scheduling requirements for isothiazolinones are adequate to address the risks associated with those substances. The NZPMA opposes the proposed amendments to the poison standard for isothiazolinones for the following reasons:

- Paints and coatings are not intended to be applied to the skin. Scheduling substances on the basis of incidental hazard is likely to set a precedent in relation to other substances and significantly expand the number of substances requiring scheduling;
- No evidence has been presented that demonstrates adverse experiences or outcomes associated with the relatively low concentration of isothiazolinones in paints and coatings that would justify the proposed regulatory action;
- Overuse of warning statements on products ultimately undermines the value and purpose of the poison scheduling system. Consumers become desensitised to warnings if they become too prevalent; and
- The data indicates that different isothiazolinones perform differently in terms of sensitisation risk. Yet, the proposal groups all isothiazolinones together. This discourages manufacturers from selecting raw materials that might offer better performance and outcomes.

If you require any additional information or would like to discuss this matter, please contact me at admin@paintman.org.nz or on +64 9 910 0141.

Yours sincerely

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