

Brussels, August 28, 2014

**CEPE comments on the public consultation on carbendazim (CAS 10605-21-7)  
as a potential candidate for exclusion under Art 5 of the BPR**

CEPE, the European Council of Paint, Printing Ink and Artists' Colours Industry, would like to draw your attention to the essential need of effective dry-film preservatives.

Outdoor coatings have to be protected against fungal and algal deterioration.

Carbendazim is one of the few remaining effective fungicides and has long been used in Europe. Its classification makes it a candidate for exclusion under the BPR.

We would like to inform the Regulators that there are very few effective dry-film biocide active substances left and, as is the case for in-can preservatives, **a holistic approach is most desirable.**

All biocides have their own technical characteristics and spectrum of activity. They are usually not replaceable one to one and several parameters must be considered: chemical and physical compatibility, stability in the wet stage and in the dry stage (such as pH on masonry), rate of degradation, leaching behaviour, intrinsic toxicity for Human Health and for the Environment etc. These are all good reasons to explain why only a handful of fungicides is used on the market and less than a handful of algaecides. Due to the inherent costs and difficulties in supporting new biocide active substances under the BPR we do not expect any significant innovation in this area.

Safe use is essential, but safety in use is demonstrated by a risk based approach and not by a hazard based approach.

Therefore, we suggest that, for those biocides that show safe use, **before taking any regulatory measure Competent Authorities get a proper overview of the impact on the dry-film preservation sector.**

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