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#CoatingsNeedPreservatives!



## Frequently Asked Questions (FAQ) on preservatives

### 1. What are preservatives?

Preservatives are used to protect against harmful organisms like pests or bacteria in the everyday things we buy and use like coatings, cleaning products and personal care items.

### 2. Why are they important?

Preservatives help to extend the useful life of products. They can also help to ensure safe drinking water and keep our homes and healthcare facilities free from harmful bacteria and mould.

### 3. How are they regulated?

Preservatives are governed by the Biocidal Products Regulation (BPR, Regulation (EU) 528/2012). This regulation requires that new products undergo extensive testing and existing products are reviewed to ensure safety.

### 4. What are the issues?

First, the requirements of the BPR have created a lengthy and costly system where manufacturers of preservatives rarely bring new substances to the market. Second, there is a Safety Review Programme that is reducing the number of existing preservatives without an impact assessment that considers availability. This means that relevant preservatives used by the coatings, paint and ink industry could be phased out.

### 5. Why is it so important for the coatings and ink industry?

An increasing number of products are now waterborne. Without preservatives, the presence of water allows microorganisms (bacteria, yeast, fungi, or algae) to grow, causing spoilage of the coating product in the can or on the applied surface.

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## 6. Are isothiazolinones in paints and coatings dangerous?

Isothiazolinones used to preserve wet paint pose no risk of sensitisation except to persons already being sensitised to these chemicals. This risk is manageable as the name of these substances will be found on the paint can, meaning these pre-sensitised persons can manage the risk by avoiding exposure to products containing these preservatives.

Isothiazolinones used to preserve the dry film may pose a risk of sensitisation when they are not used as prescribed by the supplier. This risk is anticipated to be low and paint cans apply a warning. The low risk originates from a low concentration of the preservative in paints and infrequent paint use. If an allergic reaction occurs this effect is reversible and future exposure will/can be avoided.

## 7. Can waterborne coatings be made without preservatives?

A novel solution has been found for matt indoor coatings. These preservative-free coatings use high-pH formulations to prevent microbial growth. However, technical limitations prevent the broadening of the very limited scope of application, e.g. preservative free tinting has not been established yet.

A recent study<sup>1</sup> by the Ministry of Environment of Denmark found that 'for the near future it is obvious that in-can preservation of paints remains necessary'.

## 8. What can be done?

### *Short-term suggestions:*

- > **Shift to a broader impact assessment for every substance evaluated under the BPR Safety Review Programme**

All remaining alternatives should undergo a joint impact assessment. If the impact assessment discovers no available alternatives, the continued use should be allowed.

- > **Risk management measures need to be based on an overall risk assessment instead of a simple alignment with the CLH process.**

The CLH process uses intrinsic hazards, such as skin sensitizing properties, to define concentration limits and require the use of warning labels. However, this does not constitute a safety limit addressing an identified risk. In contrast, the BPR requires an evaluation based on an overall risk assessment and therefore should not be simply aligned with the hazard classification limit of the CLH. Instead, a proper risk

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<sup>1</sup> [Ministry of Environment of Denmark \(2021\): Eco-friendly production of waterborne paint](#)

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assessment needs to be performed to identify appropriate risk management measures.

- > **Allow risk assessment at the product authorisation stage**

When risk assessment is conducted at product level, the assessment takes a holistic view on the product which is most appropriate. It also prevents artificial limitation as when applied at the earlier substance approval.

### *Long-term suggestions:*

- > **Make the BPR fit for purpose**

Reports<sup>2</sup> have already demonstrated the need to revise the BPR. They highlight a systemic lack of resources in the Member States, a significant delay in the Safety Review Programme & very limited innovation on new active substances.

- > An in-depth evaluation of the BPR is scheduled for 2025 which can be the basis for further action. Given the apparent shortcomings, the preparation for the BPR revision should start as soon as possible in order to bring the review forward.

- > The BPR processes should be independently reviewed by experts in the Fit for Future Platform that helps the EU Commission to simplify EU laws and to reduce related unnecessary costs.

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<sup>2</sup> (COM(2021) 287 final)