

## **1. ALTERNATIVE IDENTITY AND PROPERTIES**

Only a few active ingredients available on the market can be considered as a potential substitute to carbendazim in our paint products.

## **2. TECHNICAL FEASIBILITY**

Carbendazim is a long-term efficacious active ingredient against a broad spectrum of fungi. Replacement of carbendazim in our paint systems would require the reformulation of our paint products with an alternative fungicide and new testing, but with an uncertain outcome in terms of long-term efficacy. This is due to the difficulty to assess in the laboratory the long term efficacy of a fungicide.

## **3. ECONOMIC FEASIBILITY**

Due to the long-term efficacy of carbendazim we can offer high-quality paints to our customers.

If forced to replace carbendazim, this might result in a decrease in the final product quality, notably when looking at long-term fungal protection. If the perception of our product quality decreases, our sales in the EU countries and exports to non-EU markets might be affected as well.

## **4. HAZARDS AND RISKS OF THE ALTERNATIVE**

We are not in a position to comment on the hazard and risks of the alternatives.

## **5. AVAILABILITY**

There are only few fungicides for dry-film preservatives present on the market.

## **6. CONCLUSION ON SUITABILITY AND AVAILABILITY OF THE ALTERNATIVE**

There are an insufficient number of alternative active ingredients and there are many uncertainties about the market situation in the coming years, given that many active ingredients have not been reviewed yet.

The replacement of carbendazim in our paint products would be a risky exercise that might lead to a decrease in the quality of our paints.

## **7. OTHER COMMENTS**

We support the inclusion of carbendazim in Annex I as an active ingredient for use in dry film preservatives. We treat our paint products with carbendazim notably due to its long-term efficacy. The latter property is also of particular importance given that water based paints – the main consumer of fungicides – have been increasingly replacing solvent based paints. The use of carbendazim in paints can therefore help avoid early repainting, with clear benefits for the environment.