

Regulations limiting the volatile organic compound content of coating products

Dear Madam or Sir,

The European legislator has adopted Directive 2004/42/EC, another important piece of legislation intended to improve air quality. All member states of the European Union will have to transpose this Directive into their national laws. The purpose of the Directive is to limit the volatile organic compound ('VOC') content of vehicle refinishing products. This concerns you and us as well. We are writing this letter to inform you about the most essential points of the new law. However, please understand that we cannot accept any liability as to the completeness and correctness of the information presented here.

From 1 January 2007, automotive refinish coatings may not be placed on the market within the member states of the European Union unless they meet the legal limit values imposed on their volatile organic compound content (i.e., mainly on their solvent content). We will of course offer you a range of compliant products at the high quality level you know. You will be able to identify these products by the fact that their labels will show the maximum VOC content permitted in law.

Basically, all vehicle refinishing products manufactured after 1 January 2007 will be affected by the ban, i.e. they may not be placed on the market unless they are compliant. Products made before this date may be placed on the market for another period of 12 months, i.e. until and including 31 December 2007.

The only exceptions to these rules are those stated below:

As in the past, vehicle refinishing products that are processed in installations meeting the requirements of the Process Guidance Note 6/34a (06) - [Original Coatings Guideline](#) – of the Process Guidance Note 6/34b (06) [Respraying Guideline](#). This ordinance transposes the EU VOC Directive (1999/13/EC) into UK law. Moreover, coatings with a solvent content exceeding the limit values stipulated in the Directive may continue to be placed on the market if they are used exclusively for refinishing vintage cars. Finally, vehicle refinishing products are not affected by the ban, i.e. may still be placed on the market, if they are not used for vehicle refinishing but, for instance, by industrial coating businesses (including 'small industry' facilities).

Placing on the market is prohibited at all distribution levels. This means that not only we as manufacturers of these products must comply with the ban, **but you as a reseller will have to comply with the law too.** Any infringement of this ban may be punished by a fine, or may be prosecuted as a criminal offence.

If, even after 1 January 2007, you intend to continue selling automotive refinishing products with a solvent content exceeding the limit values permitted by the above-mentioned legal provisions, we recommend that you make the customer concerned sign a written statement confirming that one of the above exemptions applies. We have summarized the respective exemptions in a clearly structured way for you. You will find the overview on the internet at <http://www.rmpaint.net/voclegislation/VOCcustomerletterpdf/UK/VOCcustomer.pdf> along with links to the text of the relevant statutes.

Yours sincerely,