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**Scientific Committee for Toxicity, Ecotoxicity  
and the Environment**

European Commission  
Directorate-General Health & Consumer Protection  
Rue de la Loi 200 / Wetstraat 200  
B-1049 Bruxelles / Brussels  
- Belgium -

May 9, 2005

**Re: ETVAREAD [Expert Team for Vapour Retarding Additives] study on the "Effectiveness of vapour retardants in reducing risks to the human health from paint strippers containing dichloromethane" as presented on July 15, 2004 at the Workgroup meeting.**

Ladies and Gentlemen,

We understand your Committee has been requested to comment on the scientific relevance of above study.

The European Association of Safer Coatings Removal (EASCR) would like to raise the concern of its member companies about certain elements of above ETVAREAD study, which we regard in certain parts as factually incorrect. We would therefore request the study to be amended to take the attached comments into consideration

EASCR represents the interests of several European companies in the development and marketing of safer paint strippers --free of dichloromethane (DCM).

Member companies include:

- Eco Solutions Limited – United Kingdom
- INVISTA (Deutschland) GmbH – Germany
- INVISTA Textiles (UK) Ltd – United Kingdom
- Rutolan France S.A.R.L – France
- Scheidel GmbH – Germany
- STS Surface Treatment Systems AS – Norway
- Vliedhart B.V. - Holland

Our members, who represent less than 5% of the European paint stripping business, are not surprised that the ETVAREAD study reconfirms the finding that dichloromethane (DCM) paint strippers regularly exceed national exposure limits.

However, our members, (Eco Solution, INVISTA and Scheidel) who produce DCM-free paint strippers, have consistently been excluded from the European Commission's working group on "Restrictions on the marketing and use of dangerous substances and preparation" over the past year. During these meetings the position and views on the DCM-free product range have been misrepresented by DCM-paint stripper producers (see attached CEPE [in full] protocol from July 20, 2004).

Our members consider this as an unfair restriction since it limits their ability to compete with DCM-paint strippers throughout the EU.

While our members have developed paint strippers which are more user-friendly alternatives to DCM, they have been systematically excluded from the decision making process that will ultimately govern the production and use of paint strippers throughout the EU.

In fact our members never received the final report by Dr. Joas of BIPRO, who drafted the ETVAREAD study, while our members submitted data on their DCM-free products.

We are of the opinion that the approach taken to date willfully discards the positive development potential of alternative paint strippers. These alternative paint strippers have the potential to significantly improve the working conditions for professional and private users.

In light of the above, we would appreciate if you could review the attached document and let us know your views on the arguments put forward.

We look forward hearing from you soon.

Sincerely yours.

Dr. Gerald G. Altnau  
Chairman

Cc: Dr Hadrich, EU Commission DG Enterprise