

Dutch Standardization Institute NEN
ISO/TC 35 'Paints and varnishes' Secretariat
Mrs. Paula Bohlander

Frankfurt, 12/04/2008

By email: paula.bohlander@nen.nl

FEMIBs position on International survey on standardization of ISO/TC 35 for paints and varnishes and ISO/DIS 16053: 2007-12 “Paints and varnishes - Coating materials and coating systems for exterior wood - Natural weathering test”

Dear Mrs. Bohlander,

FEMIB is the Federation of the European Building Joinery Associations. FEMIB was founded in Paris in 1958 and represents associations of the manufacturers of the building joinery industry. Building joinery industry includes amongst others the producing in series of carpentry, prefabricated housing elements, shutters, stairs an interior work,... The main competence of FEMIB is the representation for the woodworking fenestration and door sector in Europe.

FEMIB appreciates the activity of ISO/TC 35 to develop its processes and the quality of the standards, looking to gather information through the survey. FEMIB and its members are indirectly affected by the standardization of ISO/TC 35 by using paints and varnishes for their products. Therefore we like to give you a general comment to your International survey on standardization for paints and varnishes, without going too much into detail.

FEMIB supports the ISO work which is based on the CEN standardization in the same field. The implementation of CEN standards on the international level by using the Vienna agreement should be the first choice by and should cause no problems on the market. But in our opinion, such standards should represent the state of the art before they are implemented as ISO standards. To our opinion this is not the case for ISO/DIS 16053: 2007-12. The following comment on ISO/DIS 16053: 2007-12 will give an example of the shortcomings already present in the current EN 927-3.

FEMIBs comment on ISO/DIS 16053: 2007-12 Paints and varnishes – Natural weathering test, based on the following reasons:

- 1) In our opinion, EN 927-3 has some serious shortcomings, which are explained in the following paragraphs.
- 2) The specifications for the standard test substrate are very stringent and cannot be met by normal grades of wood available on the European market. Clause 6.1 states that the wood "shall be pine that has been selected to be free from knots, cracks and resinous streaks,...", whereas clause 6.2 specifies that the test panels cut from the wood shall be (375 ± 2) mm in length. Within this length, any "normally grown" European Scots Pine will have at least on branch whorl, i.e. the requirement regarding the freedom of knots cannot be fulfilled. In the European industry, tests are at present being carried out using other wood species, e.g. Norway Spruce (*Picea abies*).
- 3) The specifications of the Internal Comparison Product (ICP) given in Annex A are obsolete. Firstly, it must be noted that most paints and varnishes used for wood coating are nowadays water-based, whereas the ICP specified in this standard is solvent-based. Secondly, to our knowledge, several of the ingredients given in Table A.1 are no longer being produced and therefore no longer available on the market, i.e. it is currently impossible to manufacture the ICP as specified. At present, the industry is experimenting with a water-based ICP, and results are reported to be quite favourable, even better than with the old solvent-based ICP. In the long run, it is intended to integrate the new water-based ICP into EN 927-3

Based on these remarks we are therefore of the opinion that, EN 927-3 should be revised and updated taking into account the comments made above, as soon as possible. Afterwards it may be adopted on the international level, if this is considered desirable.

We would greatly appreciate if ISO/TC 35 would consider our input for the further standardization and would of course be pleased to discuss our concerns further with you when appropriate.

Sincerely yours

FEMIB
The General Secretary

A handwritten signature in black ink, appearing to read 'Frank Koos', with a horizontal line underneath the name.

Frank Koos