Antifouling paints – ensuring safe use by boat owners in the UK
The following organisations have helped with the content and promotion of the British Coatings Federation’s antifouling survey, launched in Autumn 2015 to better understand the DIY use of antifouling (AF) paints:

<table>
<thead>
<tr>
<th>BCF members</th>
<th>Trade Associations</th>
<th>Interested parties</th>
</tr>
</thead>
<tbody>
<tr>
<td>AkzoNobel (Marine &amp; Protective) Coatings, International Paint</td>
<td>British Marine</td>
<td>Practical Boat Owner</td>
</tr>
<tr>
<td>Aquarius Marine Coatings</td>
<td>The Green Blue</td>
<td>Boating Business</td>
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<tr>
<td>AVKO</td>
<td>Royal Yachting Association</td>
<td>Sailing Today</td>
</tr>
<tr>
<td>Chugoku Paints B.V.</td>
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<td>Yachting Monthly</td>
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<tr>
<td>Hempel UK</td>
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<td>Motor Boat &amp; Yachting magazine</td>
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<td>Jotun Paints</td>
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<td>Classic Boat</td>
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<td>PPG Protective and Marine Coatings</td>
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<td>Berthon Boat Company</td>
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<td>Sherwin-Williams Protective &amp; Marine Coatings</td>
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<td>International Boatbuilding</td>
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<td>Teal &amp; Mackrill</td>
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<td>(Training College)</td>
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The BCF would like to thank the 2,400 boat owners who responded to a survey launched to establish the DIY application of antifouling paints, the results of which form the basis of this report. Our thanks too for providing and sharing some very useful information, comments, ideas and suggestions on the subject.
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There has been a long tradition for boat owners to paint their own vessels, and in today’s health and safety conscious society, it is important to know that antifouling (AF) paints are being used properly, with appropriate Personal Protective Equipment (PPE). The Health and Safety Executive rightly have to make risk assessments about the impact on human health and the environment when it comes to AF paints, and it is hoped this comprehensive survey of boat owners, created by a fantastic collaboration of paint and marine trade associations, boating magazines and journals, marinas and chandlers will assist the HSE when assessing future antifouling risk assessments under the Biocidal Products Regulation.

The overall conclusion of the survey, completed by over 2,400 boat owners in the Autumn of 2015, is that boat owners are highly conscious of the appropriate Personal Protective Equipment required when painting, and they actually use it. 97% wear gloves, 93% wear overalls, 92% use eye protection, 74% wear face masks.

Whilst this demonstrates highly responsible behaviour by the UK’s boat owning community, there is still room for improvement, so we plan to continue to spread the word via marine trade associations, the media, chandlers and marinas to ensure all boat owners understand the correct practices when working with our products. It is also clear that the impact of restricting AF painting to professional users would have a significant impact on costs, and there are also doubts on how this could be enforced. We hope this study will help reassure authorities that boat owners are responsible and can be trusted to use AF paints responsibly.

Gareth Prowse, Regulatory Affairs Manager at AkzoNobel (owner of the International® marine coatings brand)

Chair of the BCF Marine Coatings Group

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Antifouling paints - ensuring safe use by boat owners in the UK

2,432 boat owners took part

95% apply AF paints themselves

83% paint their boat once a year

75% take up to one day to paint their boat

PERSONAL PROTECTIVE EQUIPMENT AND RISK CONTROL

97% of DIY painters use gloves

93% of DIY painters wear overalls

92% of DIY painters use eye protection

74% of DIY painters wear face masks

62% of DIY painters wear protective boots

83% of boat owners confirmed that information provision regarding PPE is adequate

WE ASKED BOAT OWNERS WHAT THE BCF CAN DO TO ENSURE SAFE USE OF AF PAINTS

- Work closely with trade bodies (RYA, British Marine) to reach out to boat owners on best practices in AF painting and preparation
- Launch a national advertising and outreach campaign
- Promote best practice during the preparation and removal of old AF paint to minimise environmental emissions and reduce potential hazards
- Publish editorials and articles in magazines and on websites, work with the trade press
There is a concern that authorities may decide to restrict the application and use of antifouling (AF) paints to strictly professional applicators and organisations, due to the concerns over the hazards related to these paints. This could mean that the common current practice of boat-owners applying AF paints to their vessels (the 'DIY' market) would no longer be permitted.

The BCF Marine Coatings Group launched a major survey in the Autumn of 2015, aimed at establishing details regarding the current use and application of AF paints to leisure boats in the UK, by members of the public.

The main objectives for this survey were:
- to determine the current practice relating to AF paint use by the DIY market
- to determine the awareness of users to the hazards of AF paint, and emphasise the importance of using appropriate Personal Protective Equipment (PPE)
- to raise awareness amongst the boat-owning community regarding this issue
- to provide an indication as to the impact on AF paint sales, yard activity, boat maintenance costs and leisure boat ownership, if such a restriction becomes law

AF paint helps prevent the build up of barnacles and algae.

Photo credit: www.pbo.co.uk
This bulletin provides an overview of the responses to the surveys, covering the main survey that was completed by over 2,400 boat owners, as well as the three additional surveys that were intended for the boat-yard owners / managers, professional applicators and chandlers.

It also incorporates the subsequent discussions from the two BCF meetings held during January and February 2016 (the Marine Coatings Group meeting held in Leeds on 12th January, and the open forum DIY Antifouling meeting held in Southampton on 3rd February).

This bulletin sets out our conclusions, and our intended agreed action plan, to address our overall message to the leisure boat sector:

‘To secure the continued safe use of antifouling paints by the DIY applicator, through increased awareness of their hazards, and correct use of the appropriate PPE, and through establishing data on current practices, to be used for product dossiers to be prepared for the authorisation procedure under the Biocidal Products Regulation.’
BOAT OWNER SURVEY RESULTS

2,432 boat owners completed the BCF survey (see questions in appendix 1), which is a representative sample of the UK boat-owning population and a large enough sample for the results to be treated as a reliable indicator of boat owner behaviour.

A. General facts and figures on the current practice of boat owners when using antifouling (AF) paints

- 95% of boat owners apply antifouling paints themselves (confirmed by chandlers’ sales), 5% use a professional applicator.
- 92% use rollers to apply AF, 7% use brushes, 1% use spray application (professionally-applied with PPE)
- 83% apply AF annually (95% apply at least once every three years)
- 75% apply AF during the course of 1 day (95% take a maximum of 2 days to apply)
- Average expense = £183 on AF paint + £250 on ancillaries and boat lifting etc.
- Typical AF paint purchase from chandlers is 1-2 x 2.5 litre tins

Time spent by boat owners applying AF paint (to the nearest half day):

<table>
<thead>
<tr>
<th>Time</th>
<th>Applying the paint</th>
<th>Complete process</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than half a day</td>
<td>24%</td>
<td>4%</td>
</tr>
<tr>
<td>Half a day</td>
<td>25%</td>
<td>4%</td>
</tr>
<tr>
<td>One day</td>
<td>26%</td>
<td>13%</td>
</tr>
<tr>
<td>1.5 days</td>
<td>8%</td>
<td>8%</td>
</tr>
<tr>
<td>2 days</td>
<td>12%</td>
<td>18%</td>
</tr>
<tr>
<td>2.5 days</td>
<td>2%</td>
<td>5%</td>
</tr>
<tr>
<td>3 days</td>
<td>2%</td>
<td>15%</td>
</tr>
<tr>
<td>3.5 days</td>
<td>&lt;1%</td>
<td>1%</td>
</tr>
<tr>
<td>4 days</td>
<td>&lt;1%</td>
<td>9%</td>
</tr>
<tr>
<td>4.5 days</td>
<td>&lt;1%</td>
<td>1%</td>
</tr>
<tr>
<td>5 days or more</td>
<td>&lt;1%</td>
<td>22%</td>
</tr>
</tbody>
</table>

B. Personal Protective Equipment (PPE) & risk control by boat owners when painting

- 97% of boat owners use gloves when painting
- 93% wear overalls and 92% use some kind of eye protection
- 74% wear face masks, 62% wear boots
- 83% stated PPE information provision as adequate (11% provided suggestions to improve)
- 100% of the chandlers who responded provide PPE advice and sell PPE equipment
- 81% of chandlers provide data sheets (technical / safety) with the AF paint
- 68% of chandlers offer advice and equipment to protect the environment
- 0.7% (16 respondents from 2400) did not know what the term PPE referred to
- 34% of respondents use water, soap, hand cleaner or wipes to clean splashes off skin
- 13% of respondents use thinners/solvents to clean splashes off skin (not recommended)

C. What boat owners do with leftover AF paint

- 31% of DIY users leave their leftover AF paint at the boatyard / marina for disposal
- 31% of DIY users store their leftover AF paint for future use
- 26% of DIY users take their leftover AF paint to the Household Waste Recycling Centres
D. What would be the impact if there was a restriction on AF use by boat owners?

- 43% of respondents would not consider using professional applicators to apply AF
- 11% would move to using professional applicators, most stated ‘reluctantly’
- 8% of boat owners expressed an interest in becoming trained as ‘professional applicators’
- Nearly all respondents stated that such a restriction would be totally unworkable with the current provision of professional application services in the UK
- Many respondents questioned what defines a ‘professional’ AF applicator (there are no relevant formal training courses and certification in widespread use for AF application)
- 23% of boat owners would seriously consider selling their boats
- 9% would stop applying AF & clean more regularly, 5% would relocate their boat outside UK

See appendix 2 for more comments from boat owners on the impact of restricting the use of antifouling paints to professional users only.

E. Summary of comments made repeatedly by boat owners in the survey

- AF application is integral to the annual boat inspection, maintenance & repair procedure
- Significant quantities of AF paint sold via the internet, with less emphasis or advice on PPE
- Surface preparation best practice needs publicising, especially sanding & debris collection
- There are significant doubts that any future restriction could be properly enforced or policed
- Restrictions to DIY use would create an AF ‘black market’…with greater risk to human health
- There is very limited training provision available for professional AF paint applicators
- Annual occupational health screening is not standard practice for professional applicators
- Concern from some respondents including boat yard owners, that the PPE advice is not followed by all DIY users
- Maintenance items, clothing, equipment etc are sold alongside AF paint in chandlers – if chandlers close then the whole boating community will lose access to essential services

“My ownership is on a tight budget. Increased costs of using an AF professional may make my hobby become uneconomic and I would have to sell my boat. I would stop using AF paint which if followed by other owners could lead to the spread of invasive species. It also would significantly increase the cost of ownership. A professional does not apply AF differently to the way I do. They probably take even less care due to time pressure.”

Boat owner, BCF survey Autumn 2015
F. Suggestions from the survey on further actions to ensure best practice

There were many good suggestions as to what the BCF could do further to ensure best practice, safe handling and application of AF paints by DIY users:

• BCF should work closely with the Royal Yachting Association to provide additional training and support information, on best practice for the whole AF procedure, especially boat preparation and PPE use
• BCF should work closely with British Marine to reach out to boat owners through marinas
• Improve awareness and guidance on environmental aspects (sanding and disposal of debris)
• BCF could promote best practice during the preparation and removal of old antifouling paint to minimise environmental emissions and reduce potential hazards (eg using wet sanding as per manufacturer recommendations)
• Suggestions that an education programme or certification scheme could be set up to recognise DIYers as sufficiently competent to apply the AF
• Prepare posters, leaflets and a training video – use pragmatic language, not full of acronyms
• Provide a guidance leaflet and gloves / PPE attached to every tin of AF paint
• Provide a poster for display at point of sale (chandlers) and point of use (boat yards)
• Improved paint application guides from AF manufacturers, with consistent messages
• Organise training courses and workshops
• Support the collaboration between chandlers and the manufacturers of AF paints to actively promote safe use of antifouling products
• Publish editorials and articles in magazines and on websites, work with the trade press
• Provide clearer instructions on AF paint packaging (symbols, larger text, on lids of tins)
• Provide sealable hazard bags / waste collection services at boatyards
• Safety data sheet should be provided as compulsory at point of sale
• Information on mask types would be welcomed (different mask sanding vs. painting)
• PPE packs could be sold alongside the paint, combined pack pricing
• Fold-out labels with large text size could be attached to paint tins
• Create a specific website area (perhaps through the BCF website), improve access to info
• Launch a national advertising and outreach campaign
The BCF's Marine Coatings Group committee met on 12th January 2016 to review the survey results, and drew the following conclusions:

1. With over 2400 responses, there is a clear interest and concern from the leisure boat sector.

2. There is sufficient evidence to support the position that DIY users can be considered as “semi-professionals”, not typical consumer users.

3. The questionnaires have built up an interest and opinion on the subject. We need to harness this momentum and raise awareness with the appropriate authorities that they should account for the findings of the survey, when approving antifouling products according to the Biocidal Products Regulation.

4. The data will be invaluable as AF paint manufacturers begin to prepare product dossiers as part of the authorisation process under the Biocidal Products Regulation.

5. The data justifies the argument that risk assessments may be done with the assumption that DIY users wear gloves and other PPE.

6. The data helps to support the refinement of human risk assessment practices to account for PPE use by consumer users, rather than defaulting to the precautionary principle in the absence of these data.

7. Preparation of boat hulls and the removal of debris needs to be part of the focus.

8. Information on PPE and training should be more consistent and more widely available, and the BCF can get actively involved in preparing posters, literature etc.

9. Further work is required to better understand controls to minimise releases to the environment during preparation and application in public facilities (such as boat yards and marinas) where the bulk of antifouling products are applied in the UK.

An open forum meeting was held on 3rd February 2016 with representatives from the paint industry, together with British Marine, The Royal Yachting Association, The Green Blue and several boating magazines, to discuss the survey results and next actions. The group was provided with a background to the subject, and a high level summary of the results and conclusions to the BCF survey.

A set of actions was agreed as a result of the discussions, including:

- The intention to create an AF Paint Best Practice Package of guidance and tools
- The need to work with marinas and boatyards to share best practice through the AF application procedure
- The desire for the trade associations to join forces and connect with the HSE to seek funding for the proposed education programme
- Get more involvement from major marina & chandlery groups
Appendix 1 – BCF boat owner survey questions

1. On average, how often do you apply antifouling paints to your vessel?
   - Once per year
   - Once every 3 years
   - Once every 5 years
   - Less frequently

2. Do you normally use a professional applicator for this, or do this yourself?
   - Professional
   - DIY

3. Approximately how much did it cost you to apply them, on the last occasion that this was done?
   - For the paint
   - For the ancillaries (yard costs, boat lifting costs, brushes, PPE, etc.)
   - For the actual application process (if professionally-applied)

4. If you apply AF paints yourself, what application method do you use?
   - Brush
   - Roller
   - Spray

5. If you apply the paints yourself, approximately how much time do you spend (to the nearest half day) on….
   - The actual application of the paint
   - The complete process (including all the preparation, and the time to allow the paint to be fully dried, and the vessel ready to be returned to water)
   - Less than half a day
   - Half a day
   - 1 day
   - 1.5 days
   - 2 days
   - 2.5 days
   - 3 days
   - 3.5 days
   - 4 days
   - 4.5 days
   - 5 days or more

6. If you apply AF paints yourself, what precautions do you take i.e. what Personal Protective Equipment (PPE) do you use? (multiple answers possible)
   - Gloves
   - Safety glasses
   - Goggles
   - Basic face mask
   - Cartridge mask
   - Overall, coverall
   - Boots
   - Other (please specify)
7. Where did you obtain the information on PPE recommendations for AF paints e.g. from where you purchased the paint? Was the PPE readily available for purchase at the same time as the paint?

8. Do you believe that adequate information is available with regard to the use of PPE when applying these products, and that the instructions for PPE use are clear? If not, how would you suggest that this may be improved?

9. If you apply AF paints yourself, what precautions do you take to minimise spilling paint on your skin, and if you do get paint on your skin, what actions do you take to remove it?

10. If you apply AF paints yourself, what do you do with leftover AF paint?

Take to local household waste recycling centre

Dispose of in domestic waste (destined for landfill)

Other (please specify)

11. There is a concern that, in future, the authorities may decide to restrict the use of AF paints to professional applicators / organisations only i.e. that DIY use of AF paints would be banned. Please comment on what impact this may have on your ownership of a boat. Would you be happy to use professional applicators for AF paint application? Would you reduce use or stop using AF paints altogether (e.g. due to additional cost) and accept the consequences? Would you consider selling your vessel?

12. Please enter your contact details if you would like us to contact you to share the results to our survey, for the opportunity to provide further input on this topic and / or if you would like to be kept informed of the situation with AF paints.

Between 1st September 2015 and 30th November 2015 the BCF survey was available for boat owners to complete via the internet. It was publicised by various Trade Associations and magazines to maximise the take up.
Appendix 2 - specific comments made by respondents

A very broad range of comments and quotes were provided by respondents; a very small selection has been included below.

“I would not be happy to use professional applicators unless the government compensates me for the additional cost. In 30 years of using AF in various boatyards I have never seen anyone using it in a manner that caused me concern relating to H&S. This seems to me to be yet another occasion where H&S could go inappropriately overboard by stopping people taking responsibility for their own actions. I would probably seek to procure AF from abroad and find a quiet spot to apply it, possibly leading to a much greater risk to the environment! It would certainly be a factor regarding whether I would sell my boat and charter abroad from time to time. In this case the UK marine industry would lose all of my business.”

“As we both professionally apply and retail through our chandlery we would gain in one but lose in the other however I am confident that a significant amount of boat owners would “obtain” their antifoul and continue to apply it themselves. It would be impossible to police and potentially cause friction between owners & yards. It will also lead to some owners mixing their own versions (potentially very hazardous) of antifoul. It would also create a black market for antifoul. It is also worth bearing in mind that there are a large variety of places where boats are antifouled including owners driveways & drying out berths.”

“I would not use a “professional applicator” as they generally do a worse job than I do myself and costs are prohibitive. I would become a “professional applicator” (whatever that means) myself or take my boat to another country to apply the antifouling.”

“Would not use a professional. Would make my own antifouling instead - as would a lot of people I know which would be even riskier than buying commercially available paints.”

“The more worrying aspect is the removal of previous season’s paint without PPE. I wear a full face, double cartridge respirator, full coverall, gloves etc. for the removal of such. Another worrying aspect is that the scrapings aren’t collected and disposed of in a safe manner, instead left on the boatyard ground. Using a proscraper with a vacuum and using a large sheet catches the scraping for safe disposal.”

“The whole idea is un-workable. There are insufficient professional boat painters around for a seasonal activity. A professional boat painter only replicates what most of us do anyway. With 1000 boats in the Lymington marinas it would take 15 working man-years (at 3 days per boat and 200 working days per year) to complete. For it to be completed in the two months of the spring when most of the AF activity is done, would take 90 man-working-years. For the work to be done in that two months would take over 500 painters working full-time in all weathers, and in bad weather the job can’t be done at all. There are only two boat cranes in Lymington each lifting around ten boats per day, that alone would take three years.”

“I have been antifouling my own boat for forty years and can see no possible benefit to anyone in banning DIY antifouling. I deeply resent that any authority would restrict my ability to apply AF paint myself purely on any (false) concerns over the health & safety aspects of doing so. What evidence is there that people are harming themselves when applying AF paint themselves? It is a solution looking for a problem that does not exist. How would this be policed, ensure that AF paint is only available to “professionals”? Law enforcement visits at sailing clubs, driveway at people’s homes? It’s a ludicrous idea and I would continue to find a way to source and apply AF paint myself on a DIY basis.”

“Anti fouling must be applied to yachts on the south coast of England. My ownership is on a tight budget increased costs of using a AF professional may make my hobby to become uneconomic and I would have to sell my boat. I would stop using AF paint which if followed by other owners could lead to the spread of invasive species. It would significantly increase the cost of ownership. A professional does not apply AF differently to the way I do. They probably take even less care due to time pressure.”

“Totally ridiculous there are far more hazardous things we can do than applying anti-foul. Also, to use “professional” at reasonable costs would probably take less precautions than I do. But boatyards should enforce ban on dry sanding rigorously. I’d sell the boat but who would buy it faced with same situation. Net effect would be increase in number of rotting GRP hulks littering boatyards - how environmental is that?”

“It would increase the cost of ownership on an annual basis, and I am sure a black market would develop whereby owners would buy paints from professionals for an extra cost on an ‘ask no questions basis’. It might also mean that products designed for fishing or commercial vessels being used on recreational vessels with a higher risk to individuals and the environment.”
“It would be an unwelcome additional expense. I also note that many professional boatyards at present take few precautions themselves. I am particularly concerned that antifoul is often removed and the waste simply ends up in the environment. It would be better (rather than banning DIY) for it be mandatory for the industry to educate the public and professionals. The industry should also do more to produce antifous that are effective but more environmentally friendly.”

“Boating is already an expensive pastime. As sailors we are used to following rules and guidelines both on and off shore. As a skipper I am responsible for the safety and welfare of my crew and vessels near me. To suggest that I am incapable of safely applying antifoul is insulting and ludicrous. I am afraid that the proposal of such legislation says more about the lack of intellect and foresight of the politicians, law makers and bureaucrats than sailors.”

“The additional cost of professional application of AF paint would put in jeopardy my ability to afford to keep my yacht. I do not see how using a professional company to apply AF would be any safer than me doing it myself with the proper PPE. In fact would it not increase the risk for the professional as they would have to do so many more boats?”

“This would have a massive impact on the annual cost of boat maintenance, I believe that professionals would eventually hike up costs knowing that you have no other option, this would lead to a lot of boat owners reducing their maintenance leading to more dangers at sea, higher number of rescue callouts, vastly increase the number of species spread and the possibility of people being prosecuted for doing their own maintenance. As we all know when a boat is lifted anti-fouling is only a part of the initial check over, it is a small step from not being allowed to diy anti-fouling to not being allowed to diy your own maintenance or indeed the introduction of some sort of MOT.”

“Our customers are fully aware of the environmental & personal safety requirements of the application, storage and disposal of AF.”

“I see no reason to change the current system other than for yards to provide better disposal arrangements for used Paint tins / roller trays etc. so that antifoul doesn’t end up in landfill. Antifoul paint is hazardous to both unskilled/DIY applicators and also to the environment. Stricter controls of its use should be put in place. Protecting sales should not be the driver; efforts should concentrate on education in respect of safe use and disposal to protect both the user and the surrounding environment.”

“This would have a devastating impact upon my business as most of our sales are to end users and would cause my business which employees 3 full time and 1 part time staff to close. In the long term it would force prices of antifouling up and make the application in the leisure market prohibitively expensive for most boat owners reducing the number of owners and impacting on marinas, chandlers and all the other associated business involved in the leisure market.”

“This would destroy our business by the immediate loss of £100,000 of turnover and the loss of 50% of our customers who would no longer be able to afford boating. We would be out of business within 12 months. This could be disastrous as antifouling and ancillaries are a high turnover item for us. They bring large numbers of customers into the shop who buy boat maintenance and other items. The extra coat of having antifouling professionally applied would probably drive some customers to give up their boats altogether. As there are relatively few young people becoming boat owners, we cannot afford to lose any current owners.”

“As an unavoidable annual cost it would provide another reason not to buy a boat. Additional sales to professionals would not help us as they would mostly source their supplies from wholesaler.”

These are the opinions of individual boat owners who responded to the survey and should not be attributed to the British Coatings Federation.
The British Coatings Federation (BCF) is the sole UK Trade Association representing the interests of the decorative, industrial and powder coatings, printing inks and wallcovering industries. Founded in 1912 as The National Federation of Associated Paint, Colour and Varnish Manufacturers of the United Kingdom, the BCF has 130 manufacturing members representing more than 90% of the UK paint and coatings market, and 60 associate members (suppliers to the industry). Manufacturers come from a wide range of small- and medium- sized enterprises as well as large multi-nationals, with the greatest concentration of member companies based in the North-West of England. The BCF’s prime aims are to promote and to protect the interests of its members, to encourage the prosperity of the industry, to improve the business climate in which the industry operates and to provide an interface between the industry and the government, other industry and non-industry organisations, the media and the general public.

The coatings industry supplies the construction, home improvement, printing, automotive, aerospace and other advanced manufacturing sectors worth over £188 billion to UK plc. 300,000 people are directly involved in manufacturing, applying or using coatings. Three out of every four cans of paint sold in the UK are made in the UK, and 30% of UK production is exported, making the UK a net exporter of paint. Three in five paint companies export, which is well above the average of one in five UK companies at present.

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The information contained in this publication is, to the best of our knowledge, at the time of issue, true and accurate but all recommendations or suggestions are made without guarantee.