



Exterior Insulation Finish Systems

Purpose

The purpose of this notice is to clarify that Exterior Insulation Finish Systems (EIFS) are excluded from the PaintCare program. Manufacturers of these products are not required to register with PaintCare and they are not required to collect and remit the Assessment (“PaintCare Fee”) in states with active paint stewardship programs operated by PaintCare.

Background

In order to assist companies with determining what products are architectural coatings subject to the PaintCare Fee and what coatings are not, PaintCare developed a factsheet detailing what factors should be taken into consideration when making these determinations. In addition, the factsheet lists examples of PaintCare products and examples of non-PaintCare products (products that should not be assessed the fee). PaintCare relies on individual manufacturers to determine which if any of their products are part of the program. In some cases, PaintCare helps with this determination based on individual calls with manufacturers. In the case of EIFS products, based on inquiries from EIFS industry representatives and conversations with an EIFS manufacturer, it has come to our attention that manufacturers of EIFS products desire clarification on whether their products are considered architectural coatings for the purposes of active and future state PaintCare programs.

In order to ensure that all manufacturers are on a level playing field and the PaintCare Fee is placed on all products subject to the assessment, PaintCare herein clarifies that EIFS products are not considered PaintCare products and the PaintCare Fee is not required to be assessed and remitted by all manufacturers of EIFS products. The reasons for excluding this category from the definition of architectural coatings are as follows:

- Contractors who use EIFS products are specially trained and certified by the manufacturer in the proper handling and application of these products.
- EIFS products are only sold through commercial distributors to contractors and they are not sold to householders or non-trained retail consumers.
- The EIFS base coat is primarily an adhesive containing cement/mortar. Both adhesives and mortars are excluded from the PaintCare program.

- The EIFS finish coat is non-hazardous. Unused product hardens easily, is not recyclable, and is typically disposed of as non-hazardous waste.
- The finish coat of EIFS is a compound containing acrylic and inert materials (e.g., sand, calcium silicate). Joint compounds and other “semi-solid products” are excluded from PaintCare.
- An important purpose of the paint stewardship programs is to collect and recycle unused paint, stains, and coatings that are normally managed through government household hazardous waste (HHW) programs. EIFS components are not known to be a problem at HHW programs.
- PaintCare understands from EIFS manufacturers that professionals using their products do not need to use PaintCare drop off sites to dispose of unused product.

Conclusion

EIFS products are categorically exempt from PaintCare.

More Information

For more information about the PaintCare program and the responsibilities of manufacturers, please visit PaintCare.org or contact:

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