

Furniture Polishes, Waxes, and Oils

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Purpose

The purpose of this notice is to clarify that furniture polishes, waxes, and oils, such as linseed, tung, and lemon oil, that are marketed for use solely on furniture (or other items that are not stationary structures or their appurtenances) are excluded from the PaintCare program. Manufacturers of these products are not required to register them with PaintCare and are not required to collect and remit the assessment (PaintCare fee) in states with paint stewardship programs operated by PaintCare.

Background

Furniture polishes, waxes, and oils are used to clean, condition, and protect wood. These products are not considered architectural coatings if the manufacturer's product information, marketing, or container label indicate that they are intended to be used on furniture only.

The definition of architectural coatings excludes coatings recommended solely for application to items that are not stationary structures or their appurtenances (e.g., railings, cabinets, etc.); therefore, if a polish, wax, or oil is for use only on furniture according to the manufacturer's product information, marketing, or container label, it is excluded from the PaintCare program.

The manufacturer's claims or statements of potential use for a product determine whether the product is architectural and consequently, is a PaintCare program product. When the manufacturer's product information, marketing, or container label indicate that a product is designed for use on architectural surfaces (including but not limited to doors, window trim, wood paneling, and other wood trim), the product is an architectural coating. In such cases, products are part of the PaintCare program. Such products should be registered, and the PaintCare fee should be applied to them.

It is common for a manufacturer's product information, marketing, or container label to make claims or statements of multiple potential uses. When a product is designed for use on both furniture and architectural surfaces, it is an architectural coating.

USE	COVERED BY PAINTCARE
Furniture Only	No
Architectural Only	Yes
Both Furniture and Architectural	Yes

Conclusion

Polishes, waxes, and oils, such as linseed, tung, and lemon oil, that are for use on only furniture, based on the manufacturer's product information, marketing, or container label, are excluded from the PaintCare program and, therefore, fees should not be applied.

More Information

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

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