



EDUCATE • ADVOCATE • LEGISLATE

April 13, 2016

**STATEMENT OF POSITION**  
ON  
**SSPC Qualification Procedure No. 2**  
**Standard for Evaluating Painting**  
**Contractors**  
**(Removal of Hazardous Coating from Industrial/Marine**  
**Structures)**

FCA International (FCA) represents over 7,000 signatory contractors covering the finishing trades segments of the construction industry throughout North America. On April 13, 2016 the FCA Industrial Coating Contractors Industry Standards Task Group unanimously decided to express the position that all language and enforcement of the SSPC Qualification Procedure No. 2 (QP 2) Standard for Evaluating Painting Contractors (Removal of Hazardous Coating from Industrial/Marine Structures), must pertain to all contracted tasks of the QP 2 contractor. FCA International, its Board of Directors and the Industrial Coating Contractors Advisory Committee fully support this position.

The QP 2 is a nationally recognized certification that was developed to meet the industry's need for better management and performance on projects involving the removal of hazardous paint from structures in the field. The certification also serves to provide facility owners with a means to evaluate the primary capability of industrial paint contractors specific to the needs of hazardous paint removal projects.

For this reason, FCA believes that within the QP 2, Standard for Evaluating Painting Contractors, SSPC shall require or continue to require the following:

- *When QP 2 is specified by the owner, SSPC will enforce the QP 2 standard on all work performed by the certified contractor and their sub-contractors, including but not limited to performing audits and inspection of job sites.*

- *When the QP 2 standard is specified by the owner, all sub-contractors performing contract task work shall be QP 2 certified in accordance with the QP 2 standard. This includes the erection and dismantling of the platforms when such is a component of the containment.*
- *When QP 2 is not specified by the owner, the QP 2 certified contractor shall still perform all contract task work in accordance with the QP 2 standard. This includes the erection and dismantling of the platforms when such is a component of the containment.*

FCA recognizes the importance of the QP certification programs within the industry and is committed to a continued partnership with SSPC to promote and educate the decision makers on the benefits and value of the programs. However, FCA will continue to be opposed to any revision or modification to the language or enforcement of either the QP 2, Standard for Evaluating Painting Contractors (dated 9/01/09, attached) or Technology Guide No. 6, Guide for Containing Surface Preparation Debris Generated During Paint Removal Operations (dated 5/04/15, attached) which does not support our position or dilutes the standards in providing the owner a means to evaluate the primary capability of industrial paint contractors specific to the needs of hazardous paint removal projects.