CREOSOTE

Summary
Regulatory Situation
Europe

Ralph Meulepas
Creosote Council Europe
• **Status Mutual Recognition across Europe**
• Use of Creosote for Tree Stakes
• Status Specific Member States
• Free movement of treated articles within EU
• Export outside EU
• Renewal of authorization (Active Substance)
### Status Approvals

<table>
<thead>
<tr>
<th></th>
<th>WEI Congress March 2017</th>
<th>WEI Congress September 2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>Official decisions</td>
<td>8</td>
<td>17</td>
</tr>
</tbody>
</table>

- Draft decisions received from several MS
- No information from several MS
### Status Approvals

#### Official Decisions (4 September 2017)

<table>
<thead>
<tr>
<th>Status</th>
<th>Sleepers</th>
<th>Poles</th>
<th>Stakes h/c</th>
<th>Stakes full</th>
<th>Equestrian Fencing</th>
<th>Highway fencing</th>
<th>Marine</th>
<th>Bridges</th>
</tr>
</thead>
<tbody>
<tr>
<td>Austria</td>
<td>official</td>
<td></td>
<td></td>
<td></td>
<td>wine and fruit growing</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bosnia-Hercegovina</td>
<td>official</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bulgaria</td>
<td>official</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Croatia</td>
<td>official</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Finland</td>
<td>official</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Export only</td>
</tr>
<tr>
<td>Germany</td>
<td>official</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Greece</td>
<td>official</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hungary</td>
<td>official</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ireland</td>
<td>official</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
## Status Approvals
### Official Decisions (4 September 2017)

<table>
<thead>
<tr>
<th>Country</th>
<th>Status</th>
<th>sleepers</th>
<th>poles</th>
<th>stakes h/c</th>
<th>stakes full</th>
<th>equestrian Fencing</th>
<th>highway fencing</th>
<th>marine</th>
<th>bridges</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ireland</td>
<td>official</td>
<td>✔️</td>
<td>✔️</td>
<td>✔️</td>
<td>✔️</td>
<td>Export only</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Latvia</td>
<td>official</td>
<td>✔️</td>
<td>✔️</td>
<td></td>
<td></td>
<td>Export only</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Netherlands</td>
<td>official</td>
<td>✔️</td>
<td>✔️</td>
<td></td>
<td></td>
<td>Export only</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Norway</td>
<td>official</td>
<td>✔️</td>
<td>✔️</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Poland</td>
<td>official</td>
<td>✔️</td>
<td>✔️</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Spain</td>
<td>official</td>
<td>✔️</td>
<td>✔️</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Slovenia</td>
<td>official</td>
<td>✔️</td>
<td>✔️</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sweden</td>
<td>official</td>
<td>✔️</td>
<td>✔️</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Switzerland</td>
<td>official</td>
<td>✔️</td>
<td>✔️</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- **Approved**
- **Not yet approved (requires application for change)**
- **Not approved**

---

**WEI – European Institute for Wood Preservation**
• Status Mutual Recognition across Europe
• **Use of Creosote for Tree Stakes**
• Status Specific Member States
• Free movement of treated articles within EU
• Export outside EU
• Renewal of authorization (Active Substance)
Fruit Stakes

Conclusion

- In the scenario where fruits are grown in direct contact with stakes the exposure for toddlers is not acceptable.
Fruit Stakes

The outcome of this unrealistic worst case scenario withholds some member states from approving the use of creosote for tree stakes

CCE objectives:
- Improve the unrealistic worst case scenario to a more realistic worst case scenario.
- Protect both fully treated stakes and bottom treated stakes
• Status Mutual Recognition across Europe
• Use of Creosote for Tree Stakes
• Status Specific Member States
• **Free movement of treated articles within EU**
• Export outside EU
• Renewal of authorization (Active Substance)
Free movement of treated articles

Relates to treated wood for use within the EU

- Impregnation of wood for equestrian fencing in Sweden is restricted.
- Wood impregnated in Finland (treated article) can be imported and used for equestrian fencing in Sweden.

<table>
<thead>
<tr>
<th></th>
<th>sleepers</th>
<th>poles</th>
<th>stakes h/c</th>
<th>stakes full</th>
<th>equestrian Fencing</th>
<th>highway fencing</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sweden</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Finland</td>
<td></td>
<td>Export only</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- approved
- not yet approved (requires application for change)
- not approved
- Export only
Free movement of treated articles

- Addressed to several Member States
- Awareness Member States
- Limited Action
- Biocides Coordination Group
• Status Mutual Recognition across Europe
• Use of Creosote for Tree Stakes
• Status Specific Member States
• Free movement of treated articles within EU
• **Export outside EU**
• Renewal of authorization (Active Substance)
Export outside the EU

Treatment of wood for export outside of the EU

- No BPR authorisation of a wood preservative
- CA-Sep15-Doc.7.6-Final-Placing on the market (p17, 11)
- REACH Annex XVII applies

Even if there is no Biocidal Product Approval in a member state the wood can be treated for export
• Status Mutual Recognition across Europe
• Use of Creosote for Tree Stakes
• Status Specific Member States
• Free movement of treated articles within EU
• Export outside EU
• Renewal of authorization (Active Substance)
Renewal of authorization (Active Substance)

- Joint submission CCE
- Evaluating Competent Authority: UK HSE
- Expiry date AS approval 30 April 2018
- UK HSE is evaluating the submission

Authorization process includes

- **Public Consultation!**
- **Member State voting**
Downstream and End User input

Impact and Influence of Downstream Users and End Users on creosote authorization process cannot be underestimated!

It is crucial in a successful authorization process.
• Outcome of 2008 stakeholder consultation resulted in Active Substance Authorization
• Biocidal Product Approvals (2016/2017)

<table>
<thead>
<tr>
<th>Sweden</th>
<th>Finland</th>
</tr>
</thead>
<tbody>
<tr>
<td>Swedish Transport Administration</td>
<td>Finnish Transport Agency</td>
</tr>
<tr>
<td>Skanova (telecom network operator)</td>
<td>Finnish Energy (energy sector branche organisation)</td>
</tr>
<tr>
<td>Vattenfall AB (electricity grid)</td>
<td>Fingrid Oyj (high voltage grid)</td>
</tr>
<tr>
<td></td>
<td>Centre for Economic Development,</td>
</tr>
<tr>
<td></td>
<td>Transport and the Environment (bridges)</td>
</tr>
</tbody>
</table>
Thank you for your attention

Questions?