

WPA clarifies BPR and wood preservative active ingredients status

The Biocidal Products Regulation (BPR) is without question the biggest threat to the future viability of industrial wood preservation. The investment required by preservative manufacturers to meet BPR approval and individual Member State authorisation requirements is eye watering. Compliance with BPR is highly complex and, as with many other EU Regulations, often open to interpretation. Clearly, individual preservative manufacturers pursue an active ingredient policy and approval strategy that reflects their own commercial interests. This was evident in comments reported and quoted in your *TTJ* April article 'The keep actives challenge' claiming propiconazole and other azoles are the most recent casualties of BPR.

Propiconazole has been an important active ingredient of industrial wood preservatives for many years. Its demise is not as clear-cut as may be thought. Information provided to the March 13 General Assembly of the European Wood Preservative Manufacturers Group (EWPM) is the best generic guide to the status of this active. The position is that whilst a final decision has yet to be taken, the classification of propiconazole as toxic for reproduction category 1B is likely to go to completion by February 2020. This will mean it meets the BPR criteria for exclusion.

Approval of propiconazole thereafter would be on the basis of a manufacturer being able to justify a BPR derogation to permit its continued use. The availability

of suitable and sufficient alternative substances or technologies will be a key consideration as will individual Member State competent authority lobbying. Industry, including EWPM, WEI and WPA intends to support the renewal of propiconazole as a key wood preservative active substance. Until the reclassification process is finally concluded, propiconazole will not be subject to the approval consequences that would follow.

For other 'azoles' the EWPM General Assembly confirmed that no Member State had proposed any change of 'classification' status and that their continued approval would be supported by the industry.

It's absolutely normal for a manufacturer to want to focus on the positive implications of such legislation for their own product range. It's part of the cut and thrust of the commercial world. However, because BPR is so complex and at times unclear in its implications and interpretation, it is more important than ever to take the broader view and advice of a trade association such as EWPM or WPA. This is particularly so in this context because BPR has the potential to adversely affect the whole treated wood supply chain.

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