

## The situation of alternatives to Creosote in Austria

### Introduction

The Commission Directive 2011/71/EU of the European Commission, published on the 26th of July 2011, requests on the active substance Creosote in its Annex:

*„Biocidal products containing creosote may only be authorised for uses where the authorising Member State, based on an analysis regarding the technical and economic feasibility of substitution which it shall request from the applicant, as well as on any other information available to it, concludes that no appropriate alternatives are available. Those Member States authorising such products in their territory shall no later than 31 July 2016 submit a report to the Commission justifying their conclusion that there are no appropriate alternatives and indicating how the development of alternatives is promoted. The Commission will make these reports publicly available.“*

In Austria currently no Creosote-containing biocidal products are authorised under the Biocidal Products Regulation (EU) No. 528/2012. Nevertheless, some applications for authorisations are pending and the Austrian competent authority has performed an analysis of the national situation. The proposed applications include:

- Railway sleepers
- Poles for electricity and telecommunication lines
- Agricultural/industrial/road fencing
- Cladding for commercial buildings

### **Railway sleepers:**

After a brief screening phase of the current market situation the analysis showed that in Austria there are so far no suitable wood preservatives available, authorised under Regulation (EU) No. 528/2012 (BPR) that could be used as alternatives to protect wooden railway sleepers.

But the Austrian CA has gained some information of non-chemical alternative materials that may be used for railway sleepers. These sleepers are made of concrete (partially with steel enforcement) and of plastic respectively. As the first plastic sleepers recently achieved marketability, concrete sleepers are already used when new lines are established.

Due to technical properties it is important that all sleepers are made of the same material. Creosote treated sleepers are still in use to maintain the existing wooden lines. Concerning to end users there are no existing wooden alternatives available which meet the equivalent requirements.

Conclusion:

The Austrian CA concludes: A prohibition/restriction of creosote products used for railway sleepers could lead to significant economic or practical disadvantages for end users. According to Article 23 the use should therefore not be prohibited or restricted based on this analysis.

### ***Poles for electricity and telecommunication lines***

Regarding to the screening phase there is so far just one wood preservative in Austria available ("Tanalith 3462") which has been authorised under BPR in Austria that might replace Creosote for the protection of wooden poles used for electric power transmission and telecommunications. But till now the Austrian CA has gained no further experience from end users concerning the practicability of the new authorised salt based product.

There are several alternative materials available, like concrete, steel (hybrid), aluminium, or composite poles; but according to end users these are not economically reasonable or not yet sufficiently tested. As poles for electricity and telecommunication lines represent a sensitive field of use demands on safety and service life are high. Furthermore the alternative materials do not show a clear picture of less negative impacts on the environment.

The Austrian CA concludes: A prohibition of creosote products used for poles for electricity and telecommunication lines could lead to significant economic or practical disadvantages for end users. Therefore the criteria in Article 23 are not met and a restriction or prohibition based on this analysis is not feasible.

### ***Agricultural/industrial/road fencing***

Screening of alternative biocidal products: Currently there is one alternative biocidal product authorised in Austria ("Tanalith 3462"), a salt based product containing copper, to be used in UC4.

The Austrian CA has just limited information on the extent of the use of Creosote in agricultural/industrial/road fencing. According to a report by the German Competent Authority (BauA), alternative materials are routinely used in the agricultural sector. But metal posts (steel, galvanised iron etc.) have disadvantages: they are not suitable to be used in steep slopes and they release zinc to the environment. Concrete post are also routinely used in various agricultural sectors, but have a higher risk of fracture, are of heavy weight and are therefore not suitable for steep slopes.

Conclusion: Although a part of used fence posts used in Austria seem to be made of alternative materials or of wood treated with alternative preservatives, the Austrian CA is of the same opinion as presented in a report by the German "Umweltbundesamt": in order to avoid upcoming resistances – mainly in orcharding and viticulture - of copper-resistant fungi, the Austrian CA supports the German recommendation to a restricted authorisation to gain further information on upcoming resistances. However, the Austrian CA sees no necessity to authorise Creosote containing products for any further fencing-application.

### ***Cladding for commercial buildings***

The Austrian CA is not aware of this field of use for Creosote containing biocidal products in Austria. Furthermore, the screening of available wood preservatives for UC3 (Use Class 3) showed a suitable number of appropriate products, already authorised under BPR. Also a relevant quantity of alternative materials for the cladding of commercial buildings is available.

The Austrian CA concludes: As suitable numbers of alternative materials and wood preservatives are available in Austria, the Competent Authority is not willing to approve any Creosote-containing products for this purpose, but is also aware that further investigations have to be performed for this intended use.

### ***Promotion on development of alternatives***

Austria contributes with the data project “eBiozide”. The data project provides information on the amounts of active substances, which were made available on the market. The basic version will be released in 2017.

We think that the knowledge of real data is essential for any comparative assessment, helps to quantify the relevance of an active substance in socio-economic terms and can refine decisions. “eBioizde” develops a uniform data format for reports which can be used also by other Member States.

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