Verband der
Chemischen Industrie e.V.
Wir gestalten Zukunft.

VCI DISCUSSION PAPER

Wood Preservation is Key for the European Green Deal

Wood is important for storage of CO_2. If used in a sustainable way, it is a key element in reaching the Green Deal objectives. Effective chemical preservation prolongs the service life and significantly improves the sustainability profile of wood, particularly of European-grown species. However, current interpretation and implementation of regulations threatens the continued availability of effective wood preservation solutions.
The VCI calls for urgent improvement of the European regulatory framework to ensure the continued availability of effective wood preservation and to:

- Recognise the importance and benefits of chemical wood preservation and ensure continued availability of effective wood protection products.
- Strengthen innovation for Europe through a more reliable regulatory process and shorter timelines for new and improved products coming to the market.
- Ensure functioning of the internal EU market by fair and consistent implementation of the Biocidal Products Regulation (BPR).

Wood is the natural choice as sustainable construction material.

> *"And we know that the construction sector can even be turned from a carbon source into a carbon sink, if organic building materials like wood […] are applied."*
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> **Ursula von der Leyen, EU Parliament, Sept. 2020**

Forests are a renewable resource. Wood in construction locks up the CO_2 captured in growing trees. The increased use of wood as a renewable construction material is key towards a circular economy and in supporting the European Green Deal.
Wood is subject to a natural biological degradation process by fungi and insects. In particular, commercially important European wood species such as pine and spruce are not durable and hence unsuitable for applications exposed to weathering (rain, moisture) or in the ground, e. g. wood decking or cladding, fence posts or utility poles. However, without the sustainable use of home-grown European wood it will be difficult to meet the Green Deal objectives but will instead further drive deforestation of rain forests and increase CO_2 emissions.
Without effective protection, wood must be replaced more frequently owing to decay. Life cycle analysis studies show the importance of a long service life: the longer the wood can be used, the longer the carbon storage effect and the lower the CO_2 footprint of the material. Wood used in construction should last as long as the targeted life span of the building. Replacement of wood components after installation in a building structure, e. g. a wooden high rise or a wooden bridge is often not feasible. If the life span of wood structures does not meet expectations, wood as a construction material will no longer be economically attractive and builders will switch to other, less sustainable, materials.

Local-grown wood is made durable with wood protection products.

The durability and service life of wood constructions in weather-exposed or inground applications can be substantially improved and extended by the application of wood preservatives. Wood protection products control the growth of wood destroying fungi and insects. Typically, they contain several active substances. Treatment with a wood preservative is the most sustainable, cost-effective, and proven way to improve the durability of locally grown European wood species.

Wood preservation products are tested and safe.

The development, production and use of wood preservation products is regulated in the EU under the Biocidal Products Regulation No 528/2012 (BPR) and to a high protection level. The authorisation of biocidal products is a two-step process. First, all active substances contained in a product must be approved at EU level, following assessment of hazardous properties and possible risks. In the second step, biocidal products are fully evaluated before being authorised. The BPR aims to protect human and animal health as well as the environment. The applicant needs to generate extensive data and studies to prove a wood preservative is effective against wood destroying fungi and/or insects and that its application and use are safe. The BPR requires data on the possible exposure and toxicity to humans such as reproduction toxicity, carcinogenicity, endocrine disruption etc. as well as data on environmental impacts such as accumulation in soil or ecological toxicity.

Implementation of the BPR has an important impact on the internal market and the related industrial activities.

Since the start of the review programme, most active substances for wood protection have been approved. For 32 of 43 active substances, the initial approval period has expired or is expiring soon, and renewal of the approval is required by 2023. However, for ten of these active substances no dossier for renewal was submitted and another seven substances already meet exclusion or substitution criteria. Thus, in the short- to mid-term more than one-third of all active substances initially approved may very likely no longer be available. Critically, some of these active substances are highly effective and cannot be easily replaced, if at all. **It is estimated that in the near future 80 to 90% of all wood preservative products applied today would no longer be available.**

Typically, combinations of active substances with different efficacy profiles are needed to provide effective wood preservation, avoid the development of resistance or fulfil technical requirements for certain applications. A sufficient choice of approved active substances is therefore important to formulate mixtures that fulfil all requirements.

New active substances and products are not likely to become available, as the BPR regulatory framework as such limits innovation: the process is costly, with very long timelines and a high degree of uncertainty. The uncertainty arises mainly from continued updates and changes to guidelines during the development and application process as well as from linking to associated regulations, particularly on classification and labelling. The risk of non-approval is often unpredictable.

Thus, whilst the BPR objective of ensuring a high level of safety is likely being met to the degree of total risk aversion, the functioning of the internal market is increasingly distorted and could further adversely impact the wood industry overall. **The implementation of the current regulatory framework is not fit to ensure that effective wood protection products remain available and thus the continued use of wood as sustainable material is under threat.**

Europe's wood preserving industry supplies more than 6.5 million m^3 of treated wood per year for woodworking, construction, landscaping, leisure wood, agriculture, railway, telecommunication and electricity distribution applications. If effective wood preservation is no longer possible, many companies supplying wood could go out of business. To maintain European industry and jobs often located in regions with few other industrial activities, the chemical preservation of wood has to remain a viable option.

Industry calls upon EU politicians and regulators in the implementation of the Biocidal Products Regulation:

- **Recognize the importance and benefits of chemical wood preservation!**
  Effective wood preservation products are essential to ensuring European wood remains available as a sustainable material. The BPR process ensures that only products at acceptable risk are authorised. Assessment of potential hazards alone does not allow for the recognition of the significant benefits of using such products. Industry continues to strive for new and innovative products, to improve performance and sustainable use.

  Please support the continued availability of essential wood preservative products. The current regulatory framework makes it very difficult for industry to substitute certain hazardous materials. More time is needed to develop and establish suitable alternatives.

- **Help to strengthen innovation!**
  Industry has continuously demonstrated that making better products is possible. However, innovations in wood preservation need time – often more than ten years – to be developed, tested, authorised and established. Innovation can be further strengthened by making the regulatory process more reliable, shortening timelines for evaluation and by adapting data requirements and fees to reduce costs. At the time of application, it is often a challenge to find a competent authority to evaluate a dossier owing to workload or lack of specific expertise.

  Please commit yourself to strengthen innovation. Support is essential towards a more predictable regulatory process and shorter timelines for evaluation to bring new products to the market faster. Also, support towards better managing of costs by adapting data requirements and fees for approval and authorisation would make innovating for Europe more attractive.

- **Ensure the EU internal market functions properly!**
  A fairer and more consistent implementation of the BPR across all EU member states is needed to improve the functioning of the internal market. Today, regulatory capabilities differ widely between member states; many member states cannot meet legal timelines and there still is the urgent need for more coherent action.

  Please reduce the bureaucratic burden and support a continuous dialogue. Implementation of existing regulations has to be manageable for industry and authorities to ensure functioning of the EU internal market and providing a high level of safety. Help to facilitate and streamline processes. Ensure there is sufficient coordination when more than one member state is involved e. g. during mutual recognition. Please support a continuous dialogue between policy makers and industry to ensure wood and treated wood remains available as a sustainable material in Europe.

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The VCI represents the politico-economic interests of over 1,700 German chemical and pharmaceutical companies and German subsidiaries of foreign businesses in contacts with politicians, public authorities, other industries, science and media. In 2020, the industry realised sales of nearly 190 billion euros and employed around 464,000 staff.