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SubmitterType	BehalfOfAnOrganisation
OrganisationType	Company-Manufacturer
OrganisationName	Janssen Pharmaceutica NV
OrganisationCountry	Belgium
ProductType	PT08

GeneralComments

Availability

Date of 27.10.2020, ECHA lists 46 active ingredients for use in PT8, but the approval of six (6) of these active ingredients expired already and for three (3), the initial application is still pending. Furthermore, ECHA lists 2555 entries of biocidal products currently approved for PT 8. These biocidal products contain only 26 out of the 37 available active ingredients. For numerous, mainly "technical" reasons the 11 a.i.s currently not used will likely not be used in future, except for one which only received its approval in 2019.

Six (6) out of the 26 currently used a.i.s are based on boron (= boric acid, boric oxide, disodium tetraborate, disodium tetraborate pentahydrate, disodium tetraborate decahydrate, disodium octaborate tetrahydrate) and are contained in 199 of the listed biocidal product authorisations.

Further 3 actives currently used are candidate for substitution respectively it is clear that they meet the exclusion criteria and have a similar chance of re-approval than boric acid and disodium tetraborate pentahydrate.

That results in 17 active ingredients remaining, of which three (3) are organic insecticides (permethrin, cypermethrin & fenoxycarb) and further 4 have a very specific spectrum (dazomet & K-HDO) or application form (sulfuryl fluoride & hydrogen cyanide). From the remaining 10, four (4) are different forms of copper and three (3) are different QUAT types. The individual active ingredients within the groups are similar in their spectrum and application.

It is obvious for those skilled in wood preservation that disodium tetraborate pentahydrate with its very specific properties cannot be replaced by any of the remaining five active ingredients / a.i. groups (copper, QUAT, Cu-HDO, Tebuconazole and IPBC).

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An exclusion of disodium tetraborate pentahydrate will furthermore limit the number of potentially available active ingredients for PT8. This will endanger the availability of effective wood preservatives especially for construction timbers and curative applications. The lack of suitable, long term effective wood preservatives will increase the number of early and potentially fatal failure of wooden constructions and

in consequence, the trust in and use of timber as the sustainable, natural construction material will decrease. In this case, timber will be replaced eventually by alternative materials with less favorable carbon foot print and no carbon dioxide fixation capacity.

References

https://echa.europa.eu/de/information-on-chemicals/biocidal-products?p_p_id=dissbiocidalproducts_WAR_dissbiocidalproductsportlet&p_p_lifecycle=1&p_p_state=normal&p_p_mode=view&p_p_col_id=column-1&p_p_col_pos=2&p_p_col_count=3&dissbiocidalproducts_WAR_dissbiocidalproductsportlet_javax.portlet.action=dissBiocidalProductsAction, 27.10.2020
<https://echa.europa.eu/de/information-on-chemicals/biocidal-products>, 27.10.2020

SubstanceName	Disodium tetraborate pentahydrate
CommentType	PublicComments
ECNumber	215-540-4
CASNumber	12179-04-3
CompetentAuthority	The Netherlands
CommentRegarding	8
IntendedUse	Disodium tetraborate pentahydrate acts a fungicide and insecticide; and is used for industrial, professional, and non-professional users as a preventive and curative wood preservative for wood and construction timbers in Use Classes 1, 2, 3 and 4a according to CEN 335-1. Products are applied by vacuum pressure, dipping, injection, spraying/deluge, or brushing