

Preservatives - BPR - EU Biocide Regulations

Introduction: BPR (Biocidal Product Registration/Authorisation/Approval) or BPA is intended to harmonise the EU market for active substances. A biocidal substance is intended to destroy harmful organism by any means other than physical or mechanical action. These products are highly controlled because of health, food and performance concerns. They first have to be legally regulated, and all products or substances on the market such as anti-stain chemicals for wood now have to be tested and certified in order to ensure their compliance with the current EU directives. These cover primary, secondary and tertiary packaging so multiple layers between food and pallets do not nullify these requirements. They are UK law enforced by the HSE. Safety Data Sheets are available for some chemical products for active and non-active substances in the biocidal product family listing (list below) they are NOT a substitute for a compliance.

Changes due to Brexit: UK health and safety responsibilities will not change when the UK leaves the EU as government has decided that current EU chemical restrictions such as EU 528/2012 are beneficial.

Agricultural boxes: The comprehensive BS 7611: *Potato boxes*; does not contain information on chemical use. The lack of any physical membrane/packaging between stored food crop and box-wood for long periods means the potential for transmission to food is greater. Some supermarkets have at times imposed restrictions on the use of biocides for crop (ware) consumption storage boxes. The common reuse of anti-stain treated seed boxes for ware is not recommended and needs to be addressed in any revision of BS 7611.

UK wood pallet and packaging manufacturers /producers are not expected to be involved in biocide assessments. They are however users of preservatives, disinfectants etc. and are expected to be able to supply pallet and packaging customers with data including whether products contained within their sales range meet BPR. Product types timber packaging is concerned with:-

- Product-type 6: In-can preservatives
- Product-type 7: Film preservatives
- Product-type 8: Wood preservatives
- Product-type 18: Insecticides
- Product-type 19: Insect repellents

UK applications for approval for a biocide product are handled by the HSE (the designated UK Competent Authority for biocides). Your supplier of timber (if a chemical anti-stain user) will need to give you written confirmation of compliance. It is your supplier who will have made application to HSE for EU certification and not yourself or your company. If an overseas product is involved, that country (if a member of the EU) should have obtained such a product licence.

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