

QUESTIONNAIRE SURVEY ON WOOD TREATED WITH CREOSOTE– CAS 8001-58-9 / EC 232-287-5 – AND CREOSOTE-BASED SUBSTANCES REUSE AND SECONDARY USE

Objective:

Survey/Collect of information for a **Restriction proposal according to Art. 129 (safeguard clause) of REACH Regulation** (Registration, Evaluation, Authorisation and Restriction of Chemical substances).

Context:

The French Ministry of environment will submit a European restriction proposal on creosote 8001-58-9 / EC 232-287-5 and creosote-based substances covered by existing restriction entry 31 of Annex XVII of REACH regulation.

In this context, ANSES (French Agency for Food, Environmental and Occupational Health & Safety) is in charge of elaborating the restriction dossier and is carrying out a survey (questionnaire below) about reuse and secondary use of wood treated with creosote and creosote-based substances.

This survey aims at:

1. For primary uses:
 - a. Identifying the primary uses for which the reuse of wood treated with creosote or creosote-based substances for the same purpose takes place;
 - b. For each of those primary uses that may lead to reuse, collecting information on the reuse practices and annual volumes reused ;
 - c. For each of those primary uses that may lead to reuse, collecting information on the available and feasible alternatives to wood treated with creosote or creosote-based substances.
2. For secondary uses :
 - a. Identifying the primary uses for which secondary use of wood treated with creosote or creosote-based substances takes place ;
 - b. Collecting information on secondary use practices and the annual volumes of treated wood mobilized for these secondary uses.
3. Identifying key national market actors (e.g., railroad, telecommunication, or electricity network operators) responsible for primary uses for which reuse and/or secondary use takes place.
4. Identifying specific routes of disposal or recovery taking place at national/european level and main market actors responsible for the end of life of wood treated with creosote and creosote-based substances.

In order to ensure the proper understanding of the questions and the accuracy of the information collected, please take note of the definition of the following terms:

- **Use:** means any processing, formulation, consumption, storage, keeping, treatment, filling into containers, transfer from one container to another, mixing, production of an article or any other utilization (article 3-24 of Reach Regulation);
- **Primary use:** use of wood treated with creosote or creosote-based substances when first placed on the market;
- **Reuse:** in the current case, reuse of wood treated with creosote or creosote-based substances means any operation by which this treated wood is used again *for the same purpose* for which it was primarily conceived (article 3-13 of Directive 2008/98/EC);

- **Secondary use:** use of wood treated with creosote or creosote-based substances for different uses than their primary use when coming to their end of life (e.g. collection and use of treated wood as vegetable garden fences by private individuals).

Given that the restriction proposal is prepared in the framework of article 129 of REACH Regulation (safeguard clause), the notice for its submission is short (forecast early 2022). Therefore, we kindly ask you to send back the questionnaire enclosed **by September the 20th 2021**.

The questionnaire is structured as follows:

Section A	Contact details
Section B	Reuse of wood treated with creosote or creosote-based substances
Section C	Alternatives for wood treated with creosote or creosote-based substances
Section D	Secondary use of wood treated with creosote
Section E	Identifying key market actors responsible for primary uses for which reuse and/or secondary use of wood treated with creosote or creosote-based substances takes place

Section A: Contact details

Name:
Organisation Name:
Address:
Country:
Telephone number:
E-mail:

Section B:

Reuse of wood treated with creosote or creosote-based substances

Question B.1.		
Are you aware of any <u>reuse practices</u> (i.e. same use as primary use) of wood treated with creosote or creosote-based substances taking place in your country for the following primary uses?		
Treatment of wood to be used as railway sleepers	<input type="checkbox"/> YES <input type="checkbox"/> NO	Please add comments if relevant
Treatment of wood to be used as transmission poles (electricity, telecommunication)	<input type="checkbox"/> YES <input type="checkbox"/> NO	
Treatment of wood to be used as tree support poles in orchards and vineyards or other agricultural stakes	<input type="checkbox"/> YES <input type="checkbox"/> NO	
Treatment of wood to be used for fences (agricultural fencing, e.g. for horse stables and other fences)	<input type="checkbox"/> YES <input type="checkbox"/> NO	
Treatment of wood to be used in harbours and waterways	<input type="checkbox"/> YES <input type="checkbox"/> NO	
Other	<input type="checkbox"/> YES <input type="checkbox"/> NO	

Question B.2.	
If such <u>reuse practices</u> take place, please provide any information on the volume (or approximate volume or % of primary use) reused <u>annually</u> for each primary use?	
Treatment of wood to be used as railway sleepers	(please specify the unit)
Treatment of wood to be used as transmission poles (electricity, telecommunication)	(please specify the unit)
Treatment of wood to be used as tree support poles in orchards and vineyards or other agricultural stakes	(please specify the unit)
Treatment of wood to be used for fences (agricultural fencing, e.g. for horse stables and other fences)	(please specify the unit)
Treatment of wood to be used in harbours and waterways	(please specify the unit)
Other	(please specify the unit)

Question B.3.	
If such <u>reuse practices</u> take place, could you please describe these practices and provide information on involved operators for each primary use? Could you please specify if treated wood is reused by the same operator or not, and in the latter case if it is given in for free or sold? Could you please specify if information regarding safety data, risk management measures and potential exposure of human/environment are provided during reuse practises?	
Treatment of wood to be used as railway sleepers	
Treatment of wood to be used as transmission poles (electricity, telecommunication)	
Treatment of wood to be used as tree support poles in orchards and vineyards or other agricultural stakes	
Treatment of wood to be used for fences (agricultural fencing, e.g. for horse stables and other fences)	
Treatment of wood to be used in harbours and waterways	
Other	

Section C: Alternatives for wood treated with creosote or creosote-based substances

Question C.1.
For each primary use for which <u>reuse practices</u> take place, do you have any information about substitutes to wood treated with creosote or creosote-based substances <u>already used (e.g. concrete, steel, plastic, underground cables for non-chemical alternatives or copper based preservatives for chemical alternatives as identified by the Biocidal Products Committee) ?</u>

<p>Could you please provide your view about the advantages and disadvantages of those compared to wood treated with creosote or creosote-based substances? Could you also please provide indication of time that would be needed for these alternatives to be implemented in your country?</p> <p><i>Could you focus on the reuse and provide additional information you may not have provided already during the public consultation regarding creosote PT 8 that took place from 23/10/2019 to 22/12/2019 under the biocidal framework?</i></p>	
Treatment of wood to be used as railway sleepers	<input type="checkbox"/> Yes. Please provide details below <input type="checkbox"/> No
<p><i>Please provide <u>quantitative</u> data if possible</i></p> <p><i>Efficiency:</i></p> <p><i>Technical feasibility (service life, etc.):</i></p> <p><i>Economic feasibility (price per unit, maintenance costs, other associated costs ...please specify the unit) :</i></p> <p><i>Time needed :</i></p>	
Treatment of wood to be used as transmission poles (electricity, telecommunication)	<input type="checkbox"/> Yes. Please provide details below <input type="checkbox"/> No
Treatment of wood to be used as tree support poles in orchards and vineyards or other agricultural stakes	<input type="checkbox"/> Yes. Please provide details below <input type="checkbox"/> No
Treatment of wood to be used for fences (agricultural fencing, e.g. for horse stables and other fences)	<input type="checkbox"/> Yes. Please provide details below <input type="checkbox"/> No
Treatment of wood to be used in harbours and waterways	<input type="checkbox"/> Yes. Please provide details below <input type="checkbox"/> No
Other	<input type="checkbox"/> Yes. Please provide details below <input type="checkbox"/> No

<p>Question C.2.</p> <p>For each primary use for which <u>reuse practices</u> take place, do you have any information about potential substitutes to wood treated with creosote or creosote-based substances not already used (under development e.g.)? Could you please provide your view about the advantages and disadvantages of those compared to wood treated with creosote or creosote-based substances? Could you also please provide indication of time that would be needed for these alternatives to be implemented in your country?</p> <p><i>Could you focus on the reuse and provide additional information you may not have provided already during the public consultation regarding creosote PT 8 that took place from 23/10/2019 to 22/12/2019 under the biocidal framework?</i></p>	
Treatment of wood to be used as railway sleepers	<input type="checkbox"/> Yes. Please provide details below <input type="checkbox"/> No
<p><i>Please provide <u>quantitative</u> data if possible</i></p> <p><i>Efficiency</i></p>	

<i>Technical feasibility (service life, etc.)</i> <i>Economic feasibility (price per unit, maintenance costs, other associated costs ...)</i> <i>Time needed:</i>	
Treatment of wood to be used as transmission poles (electricity, telecommunication)	<input type="checkbox"/> Yes. Please provide details below <input type="checkbox"/> No
Treatment of wood to be used as tree support poles in orchards and vineyards or other agricultural stakes	<input type="checkbox"/> Yes. Please provide details below <input type="checkbox"/> No
Treatment of wood to be used for fences (agricultural fencing, e.g. for horse stables and other fences)	<input type="checkbox"/> Yes. Please provide details below <input type="checkbox"/> No
Treatment of wood to be used in harbours and waterways	<input type="checkbox"/> Yes. Please provide details below <input type="checkbox"/> No
Other	<input type="checkbox"/> Yes. Please provide details below <input type="checkbox"/> No

Section D: Secondary use of wood treated with creosote or creosote-based substances

Question D.1.	
<p>Are you aware of any <u>secondary use practices</u> of wood treated with creosote or creosote-based substances taking place in your country for the following primary uses? If so, do you have any information about :</p> <ul style="list-style-type: none"> - for each primary use, global annual volumes of treated wood mobilized for these secondary uses; - the type of secondary uses. <p>Could you also specify if treated wood given in for free or sold? Could you please specify if information regarding safety data, risk management measures and potential exposure of human/environment are provided during secondary use practises?</p>	
Treatment of wood to be used as railway sleepers	<input type="checkbox"/> Yes. Please provide details below <input type="checkbox"/> No
<ul style="list-style-type: none"> ○ <i>Annual volume mobilized by secondary uses in total (please specify unit):</i> ○ <i>Type of secondary use (garden fencing, etc.):</i> 	
Treatment of wood to be used as transmission poles (electricity, telecommunication)	<input type="checkbox"/> Yes. Please provide details below <input type="checkbox"/> No
<ul style="list-style-type: none"> ○ <i>Annual volume mobilized by secondary uses in total (please specify unit):</i> ○ <i>Type of secondary use (garden fencing, etc.):</i> 	

Treatment of wood to be used as tree support poles in orchards and vineyards or other agricultural stakes	<input type="checkbox"/> Yes. Please provide details below <input type="checkbox"/> No
<ul style="list-style-type: none"> ○ <i>Annual volume mobilized by secondary uses in total (please specify unit):</i> ○ <i>Type of secondary use (garden fencing, etc.):</i> 	
Treatment of wood to be used for fences (agricultural fencing, e.g. for horse stables and other fences)	<input type="checkbox"/> Yes. Please provide details below <input type="checkbox"/> No
<ul style="list-style-type: none"> ○ <i>Annual volume mobilized by secondary uses in total (please specify unit):</i> ○ <i>Type of secondary use (garden fencing, etc.):</i> 	
Treatment of wood to be used in harbours and waterways	<input type="checkbox"/> Yes. Please provide details below <input type="checkbox"/> No
<ul style="list-style-type: none"> ○ <i>Annual volume mobilized by secondary uses in total (please specify unit):</i> ○ <i>Type of secondary use (garden fencing, etc.):</i> 	
Other	<input type="checkbox"/> Yes. Please provide details below <input type="checkbox"/> No
Information regarding safety data, risk management measure and potential exposure of human/environment communication provided: <input type="checkbox"/> Yes. Please provide details below <input type="checkbox"/> No	

Section E: Identifying key primary users of wood treated with creosote or creosote-based substances

Question E.1.
<p>As regards reuse and secondary use practices taking place in your country mentioned in questions B.1-B.3 and D.1, could you please provide <u>some contact details</u> of the key national market actors (e.g., railroad, telecommunication, or electricity network operators) responsible for primary uses for which reuse and/or secondary use takes place?</p>

Section F: Identifying key end of life routes of disposal or recovery channels of wood treated with creosote or creosote-based substances

Question F.1.

As regards end of life routes of disposal or recovery, do you have any information regarding specific practices taking place in your country and specific contact details of the key national actors involved?

Please also indicate below any other relevant national bodies (and their contact information) which could assist us in this study:

Feel free to enclose any study, document, report which can be helpful and to add any comments on issues raised by this questionnaire in the space below:

We thank you very much for participating to this survey

We kindly ask you to send back the questionnaire filled in by September 20th 2021 (by email or regular mail) to:

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Should you need additional time to fill in the questionnaire or should you have any question, please feel free to contact us.