

FirstName	Lisa
FamilyName	Sjölin
Country	Finland
SubmitterType	BehalfOfAnOrganisation
OrganisationType	Company-Downstream user
OrganisationName	Ab PÅRAS Oy
OrganisationCountry	Finland
ProductType	PT08

GeneralComments Boric acid; the need to preserve this fungicide in products used in wood preservatives.

AltIdentityAndProp Our fear is that there are not any potential alternative active ingredients with the properties of boric acid : low enviromental toxicity, low vapour pressure, anti-corrosion and especially for our products very important penetration properties.

TechFeasibility Boric acid has very good penetration properties , which enables the protective agent to go deeper in the wood. This is especially important when producing utility poles where the service life is long and demands on preservative used very high.

The boric acid also works as a strong metal corrosion inhibitor, helping to keep production equipment in good condition and also protect nails and bolts in constructions when threated timber and poles are used.

The low vapour pressure of boric acid means that the boric acid will not evaporate and that is a great benefit for both workers and the environment.

EcoFeasibility There is a need to have well studied and competetive preservatives to be able to use wood in utility constructions with long service life, instead of for example steel and concrete where the carbon emission is higher than when using wood.

HazAndRisks Banning boric acid when will lead to uncertanty on the market and the possible use of more harmful agents.

Availability We worry that the number of wood preservatives will be reduced due to the BPR and the ban of boric acid will narrow the field even more.

AltSuitAvailConcl Alternatives to boric acid do, to our knowledge, have severe technical and environmental limitations. We are especially worried what the effect of copper-tolerant fungi when boric acid that are used as a co-biocide is removed.

SubstanceName	Boric acid
ECNumber	233-139-2
CASNumber	10043-35-3
CompetentAuthority	The Netherlands
CommentRegarding	8

IntendedUse Boric acid 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 standard. Products are applied by vacuum pressure, dipping, injection, spraying/deluge,

or brushing