

MEMO

To: Velux A/S

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Cc:

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Project PT8 products approved in Denmark, Norway, Sweden and Finland

Date: 7 May 2021

Subject: ECHA Database Analysis

1 Abstract

Authorised PT8 products has been investigated to find out how many authorised products were available in Denmark, Finland, Norway and Sweden when excluding selected active substances, whose approval is due to expire by the end of 2022. Furthermore, this study report includes criteria on fields of use, application forms and formulation type.

The overall results are listed in the table below:

	Authorised without Tebuconazole End of approval date: 30/09/2022	Authorised without Propiconazole End of approval date: 31/12/2022	Authorised without Propiconazole and Tebuconazole End of approval date: 31/12/2022 - 30/09/2022	Authorised without IPBC End of approval date: 31/12/2022
Denmark	4 products	none	none	none
Finland	2 products	none	none	none
Norway	4 products	1 product	none	none
Sweden	4 products	1 product	none	none

2 Scope

Velux A/S has requested a study report concerning authorized products in PT8 (wood preservatives) not containing the active substances Propiconazole CAS no. 60207-90-1, Tebuconazole CAS no. 107534-96-3 and 3-iodo-2-propynylbutylcarbamate (IPBC) CAS no. 55406-53-6. The products must also fulfil the following criteria:

1. Products must be authorised in Denmark, Finland, Norway and Sweden (non- cumulative list) at the date of this report
2. Products must not contain substances of very high concern (SVHCs)
3. Products must be authorised for industrial process
4. Products must be suitable for flow coat application (no pressure impregnation, no dipping)
5. The formulation of the products must be waterborne
6. Products must be effective against wood decay according to the standard EN113 (product code G10), EN839 or similar
7. Products must be effective against blue stains according to the standard EN152 (product code G21.2)
8. Products must meet the requirements of use Class 3 (EN335)

3 Method

A search was run in ECHA's database on authorised products under BPR (<https://echa.europa.eu/da/information-on-chemicals/biocidal-products>).

The following filters were applied to fulfil the criteria under points 1 and 2:

- Product-type: PT8
- Market area: Denmark, Finland, Norway and Sweden (one country at the time)
- Authorisation status: Authorised
- Substances of concern: No

A list of approved products in each country was obtained.

Each product's Summary of Product Characteristic (SPC) was analysed to verify whether products were:

- a. suitable for industrial coat applications
- b. effective against wood decay according to EN113
- c. effective against blue stain according to EN152
- d. effective use class 3 according to EN335

Where SPCs didn't contain information on use class of the product (point d), the information was retrieved from either authorisation letter or technical data sheet of the supplier.

The SPCs were also used to determine whether the products were waterborne. If such information was not available in the SPC, the relevant technical data sheet from the supplier were used.

Search results from ECHA's database for each country were compared to national databases¹ and products missing in ECHA's list were added to the results.

¹ Denmark and Sweden provide on-line databases on approved products, while Norway has a PDF file of authorised biocidal products in all PT groups that is continuously updated. Finland has no database.

4 Results

4.1 Denmark

The full list of authorised products in Denmark includes 79 products. The list is then filtered by applying the parameters:

1. No SVHC
2. Available for Industrial process
3. Suitable for flow coat application
4. Waterborne
5. Efficacy:
 - wood decay G10 according to EN113 (or EN839, or similar)
 - blue stains according to EN 152 – G21.2
 - Use Class 3 (EN335)

The following paragraphs show the search results when applying the additional criteria on the active substance.

4.1.1 Authorised PT8 products without propiconazole (CAS no. 60207-90-1)

There are no products fulfilling all the criteria. Only Induline GW-310 fulfils almost all the criteria but does not meet the criteria of EN113.

4.1.2 Authorised PT8 products without tebuconazole (CAS no. 107534-96-3)

Three products fulfil all the search criteria: Aqua Primer 2907-02, Induline SW-900 and Teknol Aqua 1401-01.

However, a newly authorised product Teknol AQUA 1411-01 (Reg. no. 417-20) fulfil most of the criteria except it is for private use. It is only registered in the Danish [Bekæmpelsesmiddeldatabasen](#) (Danish only) and not in ECHA's BPR database. The product is though known to be developed for professional use.

Update as of 4 May 2021: DHI made an inquiry to the helpdesk at the Danish EPA (MST) on the matter. According to the answer received from MST on 19 April 2021 the product is for professional use, as stated in the authorisation letter. The information on user category for Teknol AQUA 1411-01 in the Danish database is currently incorrect. The product is added to table 4.1.

Table 4-1. List of approved PT8 products in Denmark not containing tebuconazole

Trade Name	Authorisation no.	Active substance	Target organism	Use class	Application	Formulation
Aqua Primer 2907-02 (BPF)	417-7-1	IPBC (3 g/kg), Propiconazole (9.1 g/kg)	Blue stain and Wood destroying fungi	2+3	Brush machine, flow-coating, Open system: brush treatment, deluging, dip treatment, vacumat	EW - Emulsion, Oil in water
Induline SW-900	692-3	IPBC (8.1 g/kg), Propiconazole 8.1 g/kg)	Blue stain fungi, wood rotting basidiomycetes	2+3	Open system brush treatment flow coating and automated spraying in closed facilities	Waterborne
Teknol Aqua 1401-01	417-5	Propiconazole (9.02 g/kg), IPBC (3.01 g/kg)	Blue stain fungi, wood rotting basidiomycetes	2+3	Manual brushing, hand spraying, automatic spraying, open system: dip treatment, injection, deluging, flow-coating	EW - Emulsion, Oil in water
Teknol AQUA 1411-01	417-20	Propiconazole (0.6%w/w), IPBC (0,3%w/w)				

4.1.3 Authorised PT8 products without IPBC (CAS no. 55406-53-6)

There are no products authorized without IPBC that meet the criteria.

4.1.4 Authorised PT8 products without propiconazole (CAS no. 60207-90-1) and tebuconazole (CAS no. 107534-96-3)

There are no products authorized without propiconazole and tebuconazole that meet the criteria.

4.1.5 Conclusions – Denmark

At the moment (8 March 2021) there are 79 authorised PT8 products for the Danish market.

When the search criteria under Scope are applied, the following results are obtained:

- Products without propiconazole: No products are authorised
- Products without tebuconazole: Aqua Primer 2907-02 (Reg. no. 417-7-1), Induline SW-900 (Reg.no. 692-3) and Teknol Aqua 1401-01 (Reg. no. 417-5) and Teknol AQUA 1411-01 (Reg. no. 417-20) fulfil all criteria.
- Products without IPBC: No products are authorised
- Products without propiconazole and tebuconazole: No products are authorised

4.2 Finland

The list of authorised products includes 42 products (28 April 2021). The list is then filtered by applying the parameters:

1. No SVHC
2. Available for Industrial process
3. Suitable for flow coat application
4. Waterborne
5. Efficacy:
 - wood decay G10 according to EN113 (or EN839, or similar)
 - blue stains according to EN 152 – G21.2
 - Use Class 3 (EN335)

The following paragraphs show the search results when applying the additional criteria on the active substance.

4.2.1 Authorized PT8 Products without propiconazole (CAS no. 60207-90-1)

There are no products authorized without propiconazole that meet all the criteria.

4.2.2 Authorized PT8 products without tebuconazole (CAS no. 107534-96-3)

Two products fulfil all the search criteria: Aqua Primer 2907-02 and Teknol Aqua 1401-01.

Table 4-2 List of approved PT8 products not containing tebuconazole CAS no. 107534-96-3

Trade Name	Authorisation no.	Active substance	Target organism	Use class	Application	Formulation
Aqua Primer 2907-02 (BPF)	FI-2016-0007 (family)	IPBC (3 g/kg), Propiconazole (9.1 g/kg)	Blue stain and Wood destroying fungi	2+3	Brush machine, flow-coating, Open system: brush treatment, deluging, dip treatment, vacumat	EW - Emulsion, Oil in water
Teknol Aqua 1410-01 (woodex Aqua Base)	FI-2016-0008-1	IPBC (0,3 %), Propiconazole (0,9 %)	Blue stain and Wood destroying fungi	2+3	Brush or roller, Flow-coating, Spray, Open system: dipping, injection, sprinkling	EW - Emulsion, Oil in water (according to SE SPC)

4.2.3 Authorized PT8 products without IPBC (CAS no. 55406-53-6)

There are no products authorized without IPBC that meet all the criteria.

4.2.4 Authorized PT8 products without propiconazole (CAS no. 60207-90-1) and tebuconazole (CAS no. 107534-96-3)

There are no products authorized without propiconazole and tebuconazole that meet all the criteria.

4.2.5 Conclusions – Finland

At the moment (28 April 2021) there are 42 authorised PT8 products for the Finish market.

When the search criteria under Scope are applied, the following results are obtained:

- Products without propiconazole: No products are authorised
- Products without tebuconazole: Aqua Primer 2907-42 (Reg. no. FI-2016-0007, Teknol Aqua 1410-01 (Reg. no. FI-2016-0008-1) meet all the criteria defined under Scope.
- Products without IPBC: No products are authorised
- Products without propiconazole and tebuconazole: No products are authorised

4.3 Norway

The total list of authorised products includes 75 products (31 March 2021). The list is then filtered by applying the parameters:

6. Authorised
7. No SHVC
8. Available for Industrial process
9. Suitable for flow coat application
10. Waterborne
11. Efficacy:
 - wood decay G10 according to EN113 (or EN839, or similar)
 - blue stains according to EN 152 – G21.2
 - Use Class 3 (EN335)

The following paragraphs show the search results when applying the additional criteria on the active substance.

4.3.1 Authorised PT8 products without propiconazole (CAS no. 60207-90-1)

There is only one product family (16 members) fulfilling all the criteria.

Table 4-3 List of approved PT8 products not containing propiconazole CAS no. 60207-90-1

Trade Name	Authorisation no.	Active substance	Target organism	Use class	Application	Formulation
Aquawood BPF ²	NO-2021-0200	IPBC (0,8 %), Tebuconazole (0,4 %)	Blue stain and Wood destroying fungi	2+3.1	Flow-coating, Open system: deluging, brush treatment,	Waterborne

It seems that all Aquawood products are authorised in Norway and Sweden for indoors applications and not outdoors. This is stated in the SPC for the family. We have sent an e-mail question to the Austria authority to clarify if this is meant to be.

² BPF: Biocidal Product Family

4.3.2 Authorised PT8 products without tebuconazole CAS no. 107534-96-3

There are four products fulfilling all the criteria: Aqua Primer 2907-42, that is a biocidal product family with 2 members), Jotun Industri Impregnering, Laqvin Seal AA1951 and Teknol Aqua 1410-01.

The authorisation letters from the Norwegian authority for Jotun Industri Impregnering and Laqvin Seal AA1951 indicate that Teknol Aqua 1410-01 is the reference product for both.

Table 4-4 List of approved PT8 products not containing tebuconazole CAS no. 107534-96-3

Trade Name	Authorisation no.	Active substance	Target organism	Use class	Application	Formulation
Aqua Primer 2907-42 (BPF)	NO-2014-0042	Propiconazole (0,3 %), IPBC (0,6 %)	Blue stain and Wood destroying fungi	2+3	Flow-coating, Open system: deluging	Waterborne
Jotun Industri Impregnering ³	NO-2020-0185	IPBC (0,3 %), Propiconazole (0,9 %)	Blue stain, Wood destroying fungi and spores	2+3	Flow-coating, Open system	EW - Emulsion, Oil in water
Laqvin Seal AA1951 ⁴	NO-2020-0196	IPBC (0,3 %), Propiconazole (0,9 %)	Blue stain, Wood destroying fungi and spores	2+3	Flow-coating, Application with brush or roller, Spraying, Open system: dipping, injection, sprinkling	EW - Emulsion, Oil in water
Teknol Aqua 1410-01	NO-2014-0040	IPBC (0,3 %), Propiconazole (0,9 %)	Blue stain and Wood destroying fungi	2+3	Brush machine, flow-coating, Open system: brush treatment, deluging, dip treatment, vacumat	EW - Emulsion, Oil in water (according to NO SPC)

³ Same as Teknol Aqua 1410-01, according to [Norwegian authorization letter](#).

⁴ Same as Teknol Aqua 1410-01, according to [Norwegian authorization letter](#).

4.3.3 Authorised PT8 products without IPBC (CAS no. 55406-53-6)

There are no products authorized without propiconazole and tebuconazole that meet all the criteria.

4.3.4 Authorised PT8 products without propiconazole (CAS no. 60207-90-1) and tebuconazole (CAS no. 107534-96-3)

There are no products authorized without propiconazole and tebuconazole that meet all the criteria.

4.3.5 Conclusions – Norway

At the moment (31 March 2021) there are 75 authorised PT8 products in the Norwegian market.

When the search criteria under Scope are applied, the following results are obtained:

- Products without propiconazole: Aquawood BPF (16 family-members) (Reg. no. NO-2021-0200) is the only product that meets all the criteria
- Products without tebuconazole: Aqua Primer 2907-42 (Reg. no. NO-2014-0042), Jotun Industri Impregnering (Reg. no. NO-2020-0185), Laqvin Seal AA1951 (Reg. no. NO-2020-0196) and Teknol Aqua 1410-01 (Reg. no. NO-2014-040) are the only product that meet all the criteria
- Products without IPBC: No products are authorised
- Products without propiconazole and tebuconazole: No products are authorised

4.4 Sweden

The list of authorised products includes 179 products (31 March 2021). The list is then filtered by applying the parameters:

1. No SVHC
2. Available for Industrial process
3. Suitable for flow coat application
4. Waterborne
5. Efficacy:
 - wood decay G10 according to EN113 (or EN839, or similar)
 - blue stains according to EN 152 – G21.2
 - Use Class 3 (EN335)

The following paragraphs show the search results when applying the additional criteria on the active substance.

4.4.1 Authorized PT8 Products without propiconazole (CAS no. 60207-90-1)

There is only one product family (16 members) fulfilling all the criteria.

Table 4-5 List of approved PT8 products not containing propiconazole CAS no. 60207-90-1

Trade Name	Authorisation no.	Active substance	Target organism	Use class	Application	Formulation
Aquawood BPF	5633	IPBC (0,8 %), Tebuconazole (0,4 %)	Blue stain and Wood destroying fungi	2+3.1	Flow-coating, Open system: deluging, brush treatment,	Waterborne

It seems that all Aquawood products are authorised in Sweden for indoors applications and not outdoors. This is stated in the SPC for the family.

4.4.2 Authorized PT8 products without tebuconazole (CAS no. 107534-96-3)

There are four products that fulfil all the criteria: Aqua Primer 2907-42 (biocidal product family), Laqvin Seal AA1951, Nowo Wood W11 and Teknol Aqua 1410-01.

Laqvin Seal AA1951 and Nowo Wood W11 are authorised based on Teknol Aqua 1410-01 (reference product).

Table 4-6 List of approved PT8 products not containing tebuconazole CAS no. 107534-96-3

Trade Name	Authorisation no.	Active substance	Target organism	Use class	Application	Formulation
Aqua Primer 2907-42 (BPF)	5070	Propiconazole (0,3 %), IPBC (0,6 %)	Blue stain and Wood destroying fungi	2+3	Flow-coating, Brushing machine, Vacumat, Open System: Dipping, Brushing, Sprinkling	EW - Emulsion, Oil in water (according to SE SPC)
Laqvin Seal AA1951 ⁵	5623	IPBC (0,3 %), Propiconazole (0,9 %)	Blue stain, Wood destroying fungi and spores	2+3	Flow-coating, Application with brush or roller, Spraying, Open system: dipping, injection, sprinkling, Automatic brush	EW - Emulsion, Oil in water (according to SE SPC)
Nowo Wood W11 ⁶	5674	IPBC (0,3 %), Propiconazole (0,9 %)	Blue stain and Wood destroying fungi	2+3	Brush or roller, Flow-coating, Spray, Open system: dipping, injection, sprinkling	EW - Emulsion, Oil in water (according to SE SPC)
Teknol Aqua 1410-01 (woodex Aqua Base)	4707	IPBC (0,3 %), Propiconazole (0,9 %)	Blue stain and Wood destroying fungi	2+3	Brush or roller, Flow-coating, Spray, Open system: dipping, injection, sprinkling	EW - Emulsion, Oil in water (according to SE SPC)

4.4.3 Authorized PT8 products without IPBC (CAS no. 55406-53-6)

There are no authorized products without IPBC that meet the criteria.

⁵ Same as Teknol Aqua 1410-01, according to [Swedish authorisation document](#).

⁶ Same as Teknol Aqua 1410-01, according to [Swedish authorisation document](#).

4.4.4 Authorized PT8 products without propiconazole (CAS no. 60207-90-1) and tebuconazole (CAS no. 107534-96-3)

There are no products authorized without propiconazole and tebuconazole that meet the criteria.

4.4.5 Conclusions – Sweden

At the moment (31 March 2021) there are 179 authorised PT8 products for the Swedish market.

When the search criteria under Scope are applied, the following results are obtained:

- Products without propiconazole: Aquawood BPF (16 family-members) is the only product that meet all the criteria in Sweden
- Products without tebuconazole: Aqua Primer 2907-42 (Reg. no. 5070), Laqvin Seal AA1951 (Reg. no. 5623), Nowo Wood W11 (Reg. no. 5674), Teknol Aqua 1410-01 (Reg. no. 4707) meet all the criteria defined under Scope.
- Products without IPBC: No products are authorised
- Products without propiconazole and tebuconazole: No products are authorised

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5 Conclusions

The search performed in ECHA's database and national databases on approved biocidal products shows that there are only very few products that meet the criteria set out under Scope. An overview of the findings of the search is shown in table 4.1.

Table 5-1 Overview of products authorised under PT8 and meeting the criteria in Scope.

	Authorised without Tebuconazole End of approval date: 30/09/2022	Authorised without Propiconazole End of approval date: 31/12/2022	Authorised without Propiconazole and Tebuconazole End of approval date: 31/12/2022 + 30/09/2022	Authorised without IPBC End of approval date: 31/12/2022
Denmark	<ul style="list-style-type: none"> • Aqua Primer 2907-02 (BPF) (Reg. no. 417-7-1) • Induline SW-900 (Reg. no. 692-3) • Teknol Aqua 1401-01 (Reg. no. 417-5) • (Teknol AQUA 1411-01, Reg. no 417-20)⁷ 	-	-	-
Finland	<ul style="list-style-type: none"> • Aqua Primer 2907-02 (BPF) (Reg. no. FI-2016-0007) • Teknol Aqua 1410-01 (Reg. no FI-2016-0008-1) 	-	-	-
Norway	<ul style="list-style-type: none"> • Aqua Primer 2907-42 BPF (Reg. no. NO-2014-0042) • Jotun Industri Impregnering (Reg. no. NO-2020-0185) • Laqvin Seal AA1951 (Reg. no. NO-2020-0196) • Teknol Aqua 1401-01 (Reg. no. NO-2014-0040) 	Aquawood BPF (Reg. no. NO-2021-0200)	-	-
Sweden	<ul style="list-style-type: none"> • Aqua Primer 2907-42 BPF (Reg. no. 5070) • Laqvin Seal AA1951 (Reg. no. 5623) • Nowo Wood W11 (Reg. no. 5674) • Teknol Aqua 1401-01 (Reg. no. 4707) 	Aquawood BPF (Reg. no. 5633)	-	-

⁷ Professional use according to approval letter (e-mail from Danish EPA dated 19 April 2021).

6 Timeframe for handling authorisation applications under national transitional period rules

Below it is provided an overview over the timeframe indicated by the competent national authorities to evaluate and rule on authorisation applications under the transitional period rules in Denmark, Norway, and Sweden. Transitional rules apply when the active substance(s) in the product is under review for authorisation under BPR and is not a new substance under the relevant product type.

6.1 Denmark

New active substance authorisation: 18-24 months.

Me too authorisation: up to 18 months.

6.2 Finland

Wood preservatives containing diamine or polymeric betaine needs to be authorised after the transitional rules. Otherwise, there is no need for authorisation.

Products must be notified to the national Product Register.

Product Register notification: 1-2 hours (as soon as all the required information are inserted in the system)

6.3 Norway

Biocidal products under PT8 are not required to be approved by the national authorities in the transitional period. Products must be notified to the national Product Register.

Product Register notification: 1-2 hours (as soon as all the required information are inserted in the system)

6.4 Sweden

Transitional period authorisation: 6 to 12 months.

Hørsholm, 7 May 2021

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