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To whom it may concern,

EuroWindoar, representing European manufacturers of windows and doors, wishes to underline the significant importance of Tebuconazole for the sector and to advocate for its continued authorisation under the Biocidal Products Regulation for Product Type 8 (wood preservatives).

Wooden windows and doors, especially those exposed to outdoor environments, depend on effective and reliable fungicidal protection. Through years of industrial experience, Tebuconazole has proven to be uniquely suited for this purpose, contributing to both the durability and performance of timber products supplied by our members. No currently available alternative offers the same balance of efficacy, process compatibility, and confidence in long-term service life for end users.

The consequences of losing access to Tebuconazole would extend beyond technical challenges. It would compromise the competitiveness of wooden windows and doors, increase complexity in manufacturing, and challenge resource efficiency goals due to shorter product lifespans and potentially higher energy and carbon footprints from replacement materials. Alternatives, where available, often come with increased environmental loading, reduced preservation efficacy, or practical difficulties in adapting to automated production processes and quality requirements within our industry.

In the production of timber windows and doors, preservative applications are strictly regulated and performed within closed processes, ensuring a high level of control and minimising risks to operators and the surrounding environment.

EuroWindoar therefore calls on regulators to carefully consider the indispensable role of Tebuconazole for our sector and the broader impacts associated with withdrawal. We strongly recommend granting continued approval for PT8 uses, until proven, equally effective alternatives are available that support both quality, innovation and sustainability objectives for European window and door producers.

EuroWindoar remains committed to transparent dialogue and ongoing collaboration with decision-makers to advance practical and responsible wood protection solutions for the benefit of European society.

Yours sincerely,

Frank Koos
Secretary General