EuroWindoor submission on the Public Consultation on the Renewal of Tebuconazole for Product Type 8 (Wood Preservatives)

I. Personal Information

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II. Organisation

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III. Information

A. Availability of suitable alternatives

1. Alternative identity and properties

Across the European window and door industry, Tebuconazole plays an integral role in safeguarding timber joinery and profiles against decay — especially from basidiomycete (rot) fungi. A thorough review of currently available chemical and non-chemical alternatives reveals that options such as copper-azole, copper-quat, and copper-HDO do not deliver a similar combination of efficacy, preservation duration, or suitability for industrial manufacturing of wooden windows and doors. Particularly in exterior joinery, these alternatives cannot match Tebuconazole's broad-spectrum performance and flexibility.

2. Technical feasibility

In practical application, alternatives to Tebuconazole are hampered by several technical drawbacks:
Their spectrum of efficacy is generally narrower, resulting in increased vulnerability of wooden components to fungal attack and shorter product lifespans.
Industrial processes for windows and doors require compatibility with coatings, adhesives and precise manufacturing methods — which many alternatives do not provide.
Reliance on a limited selection of active substances undermines resistance management.
Certain alternatives, such as Penflufen, only fit a small range of uses.
Bringing new active substances to market requires lengthy development and rigorous registration, meaning any real alternative is still years away.

3. Economic feasibility

The industry finds that replacement substances often come with higher treatment dosages, complex application protocols and increased maintenance needs. This can quickly drive up both manufacturing and lifecycle costs for wooden windows and doors, eroding their ability to compete with higher-carbon alternatives such as aluminium, PVC or composite products.

4. Hazards and risks of the alternative

Alternative preservatives — especially those based on higher copper content — tend to require greater quantities to achieve partial protection, leading to higher occupational and environmental exposure. Some also have less favourable hazard profiles and can cause technical complications, such as adhesion problems or premature coating failure, thereby increasing risk throughout the service life of the product. In summary, switching from Tebuconazole does not result in clear risk reduction, especially given its contained use in controlled industrial processes.

5. Availability

Market availability of alternatives is constrained by reliance on only a few suppliers, increasing supply chain risks and price volatility. Many potential future solutions are still experimental or in early development and cannot fulfil industry needs in the foreseeable future.

6. Other comments

None.

7. Conclusion on suitability and availability of alternatives

Current scientific and practical experience leaves no doubt: neither authorised chemical nor non-chemical alternatives deliver the necessary mix of performance, durability and process compatibility that Tebuconazole provides for the window and door sector. It remains indispensable for the reliable, long-lasting protection of timber products.

B. Derogation conditions according to Article 5(2) of the BPR

1. Negligible risk

In window and door production, Tebuconazole is used primarily in specialised, enclosed industrial environments with stringent safety measures. As a result, both operator and environmental exposure are minimised, with risk levels assessed as negligible.

2. Essentiality to prevent risks

Tebuconazole is vital for maintaining the structural integrity and longevity of wooden windows and doors. Without it, there is a significant threat of product failure, more material waste, and an increase in carbon-intensive replacement solutions, which runs counter to EU sustainability ambitions.

3. Socio-economic and environmental impacts

Loss of Tebuconazole would damage the competitiveness and attractiveness of wood as a sustainable material for windows and doors, with adverse effects on production costs, environmental footprint, and market stability across Europe. It would also encourage a shift to less sustainable product choices, impeding circular economy and Green Deal objectives.

IV. Attachments

We refer to the letter attached expressing our strong support for the renewal of Tebuconazole under Regulation (EU) No 528/2012 for Product Type 8 (Wood Preservatives).

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About EuroWindoor AISBL – EuroWindoor AISBL was founded as an international non-profit Association, in order to represent the interests of the European window, door and facade (curtain walling) sector. Our 20 national associations speak for European window, door and facade manufacturers that are in direct contact with consumers, and thereby having large insights on consumers' demands and expectations. We are at the forefront interacting with dealers, installers and consumers buying windows and doors, and the companies behind the associations cover selling all over Europe.