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Calders & Grandidge

The use of **Creosote** and **Creosote-treated Wood**

Introduction

100% Coal Tar Creosote ('Creosote') has been used for nearly 200 years to impart reliable service life to wood and has proven its usefulness even under the most challenging conditions. Applications include: railway sleepers; poles for electricity and telecommunication distribution; fencing and other critical in-ground contact uses, such as tree stakes. Reliable and detailed reports have been published on creosote which, together with experience of the performance of creosote-treated wood in service, provide confidence in its excellent qualities as a wood preservative. It is the only preservative shown as suitable for a Use Class 4 (UC4) 60 year service life in the WPA Code of practice.

There are some emerging preservative treatments for wood traditionally treated with creosote – typically copper-organic oil-based formulations. None are yet commercially available for use in England, Scotland and Wales (GB). Wood treated with such preservatives may be imported into GB for exterior (use class 3) or ground contact (use class 4) use. Manufacturers are currently claiming a service life of up to 40 years for such treated wood products.

Use of Creosote

Creosote is authorised for sale, supply and use in GB under the **Biocidal Products (Health and Safety) (Amendment) Regulations 2022 (GB BPR)** that implement an amended version of the **EU Biocidal Products Regulation (EU BPR)**. The latter still applies in N. Ireland.

Wood may currently be treated with creosote in GB (at the date of this publication) for the following end uses:

1. **Railway sleepers and fence panels/horizontals used in highway fencing, equestrian fencing and animal security fencing (BS 8417 Use Class 3).**
2. **Overhead Electricity Poles; Telecommunication poles; Fencing posts for the safety critical uses of highways fencing, equestrian fencing and animal security fencing; Agricultural tree stakes/supports (fruit, vineyard and hops) only when a long service life (safety critical) is required (BS 8417 Use Class 4 - ground contact but not to be placed directly in fresh water).**
3. **Surface treatment of the above uses (to allow for re- treatment of surfaces exposed by working treated wood – for example cross-cutting and boring holes).**

Note that the GB and EU regulations apply to the **use of creosote** to treat wood not, apart from labelling obligations, to the **use of treated wood** – though wood treated with creosote in GB now should only be placed on the market when intended for the uses listed. Once on the market (whether treated in GB or imported) creosote treated wood may be used in GB in accordance with the UK version of the **Registration, Evaluation, Authorisation & Restriction of Chemicals (REACH) Regulation (UK REACH)**.

Under **UK REACH**, creosote-treated wood may be used in professional and industrial uses in any situation apart from those listed in the regulations (generally those uses that involve risk of frequent contact with the treated wood). The regulations also give examples of professional and industrial situations where creosoted wood may be used that include: **on railways; in electrical power transmission and telecommunications; fencing; agricultural purposes (e.g., stakes for tree support); harbours and waterways.**

For **N. Ireland** (and the EU) a Commission Implementing Regulation (CIR) was published on 14 October 2022 for creosote as an active substance and provides for creosote to remain **approved as an active substance for use in wood preservatives until 31 October 2029**. Creosote-based preservatives are shown by ECHA (the European Chemicals Agency) with an expiry date of 29 March 2024, which is expected to be extended in member states that align with the CIR. However, wood treated with creosote **from 30 April 2023** may only be placed on the **EU market as railway sleepers and/or poles** in those member states listed by ECHA. **The current version of that list includes N. Ireland for both sleepers and poles.**

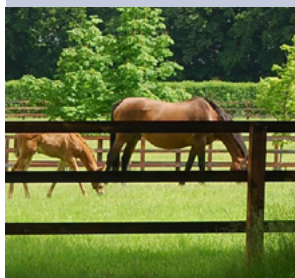


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Use of Creosote and Creosote-treated Wood

Advice to sellers/suppliers of creosoted wood

The BPR (Article 58) requires treated articles to carry a label that includes:

- (a) a statement that the treated article incorporates biocidal products;
- (b) the biocidal property attributed to the treated article (for example protects against fungal decay);
- (c) the name of all active substances contained in the biocidal products;
- (d) any relevant instructions for use, including any precautions to be taken because of the biocidal products with which a treated article was treated or which it incorporates.

The BPR requires that labelling shall be 'clearly visible, easily legible and appropriately durable. Where necessary because of the size or the function of the treated article, the labelling shall be printed on the packaging, on the instructions for use or on the warranty'.

Disposal of waste creosote-treated wood

Before disposal, it is good practice to consider if the wood could be **reused** or **recycled**. If so, it must only be reused in one of the permitted uses - see allowed uses under **UK REACH**, oveleaf.

When creosote-treated wood reaches the end of its service life and has to be disposed of then disposal must be in accordance with the regulations on **hazardous waste**.

Waste from domestic uses such as garden fencing may use normal domestic waste disposal procedures. Waste from commercial use must be managed according to hazardous waste regulations. Creosote- treated wood may be burned for disposal in a Waste Incineration Directive (WID)-compliant incinerator, most beneficially for energy generation - heat or power. This works best for large quantities of waste wood - call the WPA for information on WID-compliant incinerators.

Guidance on reuse, recycling and waste disposal is available in Guidance Note [WPA TW 14: UK guidance on the classification of treated wood waste](#).

Creosote for DIY

Creosote is not permitted for DIY use.

Alternative DIY treatments are available - it is advised to check suitability of each product by reading the label or point of sale literature.

This Guidance Note is not legal advice. Companies and individuals are advised to seek advice from their own legal advisors if they are in any doubt as to the application of the regulations to their own situation. The WPA, its employees and officers cannot be held liable for any loss or liability arising from reliance on this guidance document which is nevertheless offered in good faith.

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