



EUROPEAN COMMISSION

DIRECTORATE-GENERAL
ENVIRONMENT
Directorate C – Air and Chemicals
ENV.C.4 – Industrial emissions

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Mr Filip de Jaeger
Secretary General - CEI-Bois
European Confederation of Woodworking
Industries
Allée Hof-ter-Fleest 5/4
B-1070 Bruxelles

Mr. Fons Ceelaert
Secretary General – FEFPEB
PO Box 90154
5000 LG Tilburg
The Netherlands

Subject: Reductions in the use of methyl bromide as a result of the implementation of heat treatment technology in the European Union

Dear Mr de Jaeger and Mr Ceelaert

Thank you for your information provided to the Commission on 9th February and 20th April 2005 on the use of heat treatment facilities for treating solid-wood packaging material (SWPM) to minimise the risk of pests being spread in global trade.

I understand from your recent survey that more than 1800 companies in France, Germany, Portugal, Spain, Sweden, The Netherlands and the United Kingdom, are registered to use heat treatment to comply with the requirements of ISPM 15. The vast majority of these companies were reported to have adopted the International Plant Protection Standard ISPM-15 that prescribes specific conditions for the use of heat for the disinfestation of wooden pallets.

You mentioned that some companies are still registered to use methyl bromide for the treatment of SWPM but that the objective is to abolish these uses as soon as possible. We understand from your information that 20-25% of the EU timber consumption is used to produce some 350 million pallets, and that the vast majority of them are produced from heat-treated wood.

As a result of our discussions, the Commission is impressed by the extent to which heat treatment technology is to be implemented in some Member States in the EU for the treatment of wooden pallets. This technology is clearly a practical alternative to fumigation with methyl bromide and the use of such wooden pallets significantly contributes to reducing and even eliminating methyl bromide used for the treatment of SWPM.

Following international agreement in the Montreal Protocol to ban the majority of the uses of methyl bromide from 31 December 2004 in developed countries, the European Union allows limited amounts of methyl bromide to be used for critical uses, and for quarantine and pre-shipment (QPS) uses. Any pallets treated with methyl bromide would fall under the QPS use. The amount of methyl bromide that can be placed on the EU markets under Regulation (EC) No 2037/2000 on “Substances that Deplete the Ozone Layer” for QPS is limited to 607 ODP tonnes annually, which is equivalent to about 1000 tonnes.

Article 4(2)(iii) of this Regulation requires users of methyl bromide for QPS to report annually on the amount of methyl bromide consumed for QPS, the purposes for which it was used, and progress in evaluating and using alternatives. The Commission, in discussions with the Management Committee consisting of representatives of the Member States, may then take measures following the procedures described in Article 18 of the Regulation to reduce the amount of methyl bromide available for QPS in the light of technically and economically available alternative substances or technologies.

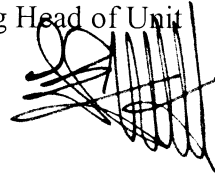
The Commission understands that your survey on the use of heat treatments and methyl bromide is on-going and in this regard we would be interested in any further information that you might be willing to provide on the amount of methyl bromide that is used for the treatment of SWPM by the companies that are affiliated to CEI-BOIS and FEFPEB. We understand that CEI-BOIS and FEFPEB have within their organisations some 80% of the woodworking companies in the EU and therefore any further results from your survey would be very useful. With prior consultation with your organisation, we would be interested in seeking the views of the members of the Management Committee to determine the prospects for reducing the amount of methyl bromide used for QPS due to the implementation of heat treatment technology as an alternative to methyl bromide in Europe.

The Commission is mindful that not all countries yet have access to heat treatment facilities and therefore in these cases there will remain for some time a possibility that methyl bromide could be used to disinfect SWPM that is found to be contaminated with pests *on arrival* in the European Community. The use of methyl bromide for this purpose will reduce the limited amount available for other QPS uses. In this regard, we very much appreciate the work of CEI-BOIS and FEFPEB to promote, through the appropriate authorities, the use of heat treatment facilities for treating SWPM in other countries prior to export to Europe.

In regard to the use of timber or plastic materials, the Commission acknowledges that both heat-treated timber and plastic used for the manufacture of pallets are capable of achieving the objectives and requirements of EU legislation with regard to eliminating the use of methyl bromide. In this context, although the content of this communication is restricted to the possibilities of reducing the use of methyl bromide for QPS, the Commission is very much aware of the positive facts and benefits in connection with the use of timber for packaging material, including its ability to be repaired, re-used and recycled.

Thank you once again for providing information on the technology that has been implemented in Europe to substantially reduce the dependency of the wood manufacturing industry on methyl bromide. We look forward to working with you in the future on any other initiatives that would result in the total elimination of methyl bromide.

Laurence Graff
Acting Head of Unit

A handwritten signature in black ink, appearing to be 'L. Graff', written over the typed name and title.

c.c.: A. Runge-Metzger, P. Horrocks, T. Batchelor, M. Wandinger, J. Wall
Member State representatives, single point of contact