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Appeal for the cultural heritage collections: Allow the use of in situ generated nitrogen for the preservation of heritage (EU 528/2012)

Heritage institutions, museums, archives, depositories and monuments are frequently challenged by pests due to various forms of contamination and changing climatic conditions. One of the most versatile and environmentally friendly methods, where the use of hazardous chemicals is avoided, for disinfection purposes are "anoxia" or controlled atmospheres with an extremely low content of oxygen in treatment chambers where nitrogen is generated in situ for anoxic insect disinfection of cultural heritage objects.

The EU legislation issue


Since the mandatory registration of the use of nitrogen for disinfection purposes by the biocidal products regulation EU 528/2012 in September 2017, only one method of using nitrogen (along with several other restrictions) was acknowledged and included: nitrogen in canisters. In situ generated nitrogen fell out. The nitrogen ban is not justified for health aspects and economically damaging the market of European stakeholders in the integrated pest management (IPM) business.

Because of this juridical flaw, existing anoxia facilities in Flanders, Belgium and Europe can no longer be operated legally. As a result, cultural heritage institutions are facing an acute danger of damage or irretrievable loss.

I therefore ask the Commission to allow for a derogation under art. 55(3) in the BPR to be granted those Member States applying, because this method allows any material to be safely treated, contrary to the alternatives. In situ generated nitrogen is harmless, the most economic and environmentally friendly alternative to the presently allowed use of nitrogen for this purpose.

On the other hand we would also strongly urge the Commission to work on a more effective and durable solution for this problem by starting the procedure to insert in situ generated nitrogen in Annexe 1.

Kind regards,
On behalf of the Director-General Sonja Vanblaere, absent



Luc Van Havere
Senior advisor