

WOOD TREATMENT INSTALLATIONS

EUROPEAN CODE OF PRACTICE FOR THEIR
SAFE DESIGN AND OPERATION 2021



National Codes Of Practice

This Code of Practice is a European code dealing with principles for safe design and operation of wood treatment installations. It does not replace or supersede existing national Codes of Practice. It may be used, however, as a model for national codes where they do not already exist or for updating existing codes to a standard acceptable to national regulatory authorities.



BREF/BAT reference document for wood preservation techniques.



Wood Treatment Installation - European Code of Practice for their Safe Design and Operation 2021.

SCOPE

The Industrial Emissions Directive (IED) (2010/75/EU) of The European Parliament and of the Council) establishes a requirement for EU member states to issue permits to operate certain industrial processes, including preservation of wood and wood products with chemicals (other than exclusively treating against sapstain). The purpose of the directive is to prevent, reduce and, as far as possible, eliminate pollution arising from industrial activities by identifying appropriate techniques for limiting or preventing emissions to air, water and soil.

For each industrial process, the EU commissions a Best Available Techniques Reference Document (BREF) with techniques (BAT conclusions) agreed by a panel of experts from members states, industry and Non-Governmental Organisations (NGOs). For wood treatment a BREF was published in 2020 covering surface treatment with organic solvents and wood preservation with chemicals.

For wood treatment, the IED sets a production capacity threshold of greater than 75m³ treated wood per day before its provisions apply to a treatment facility. EU guidance identifies technical and legal restrictions that may affect the calculation of capacity. The basis for calculation of production capacity is at the discretion of IED national regulatory authorities in member states and there is a wide variation in policy on threshold calculation. Thus, similar size treatment plants in different members states may be regulated differently. Where a treatment plant is declared as exceeding the IED threshold, or the local regulatory authority concludes that its production capacity exceeds 75m³ per day, then a permit will be required and the BREF and its techniques will apply. For plants whose size or operational practices result in it not exceeding a production capacity of 75m³ per day, this Code of Practice provides a model for safe design and operation designed to ensure that the benefits of wood treatment in supporting the sustainability characteristics of wood are achievable without compromising health, safety and environmental protection.

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1. SPONSORS OF THIS CODE OF PRACTICE

EUROPEAN WOOD PRESERVATIVE MANUFACTURERS GROUP (EWPM)

The aim of the EWPM is to promote, with integrity, the correct use of wood preservatives including production, transportation, utilisation and disposal.

It acts as an official representative of the industry when approaching authorities, institutions and any other competent body on a European or international level.

EWPM members work towards the improvement of technical guidelines within the industry for the benefit of consumers, specifiers and other stakeholders recognised by it.

EUROPEAN INSTITUTE FOR WOOD PRESERVATION (WEI-IEO)

The IEO-WEI is the European industry trade association representing the pressure treated wood industry.

It promotes the benefits of treated wood whilst representing the wood preservation industries within the European Union.

The activities of the WEI-IEO are based around wood preservatives, environmental and technical issues and the marketing of finished wood products.

PURPOSE

The purpose of this document is to provide generic guidance on environmental, safety and health aspects relevant to all companies in the European Union engaged in the activity of industrial wood preservation. Such guidance is also intended to be useful to those regulatory authorities responsible regulating the wood preservation industry, for third party inspectors and certification authorities.

The general principles set out in the code are also relevant to the industrial application of fire retardant chemicals.

Most aspects of the design and safe operation of wood treatment installations are regulated by national laws which implement EU directives or EU regulations apply directly. This Code of Practice lists the key regulations and the directives from which national laws are derived.

Note this Code of Practice uses 'should' throughout to indicate recommended best practice. Some aspects of plant design and operation are covered by mandatory legal requirements and wood treatment companies are responsible for complying with such mandatory requirements.



Supporting Guidance for Timber Treatment.

2. CHOOSING OR CHANGING YOUR WOOD TREATMENT OPERATION

If a new treatment plant is to be installed, or an existing plant modified, then production capacity will determine whether the new or modified plant is to be operated with an IED permit. If so, then early discussions with the IED regulatory authority in the relevant member state is advised to ensure that appropriate BREF techniques become part of the design and operation procedures from the beginning. If a plant is determined to be below the production capacity threshold then adhering to the principles in this Code of Practice is advised.

It should also be noted that plant operation may be regulated under other EU or national rules that set out general principles for safe design and/or operation. Relevant EU legislation is listed in section 8. Some conditions of authorisation for use of wood preservatives in individual member states under the provisions of the Biocidal Products Regulation (BPR) (EU) No 528/2012) or national biocides regulations may impose requirements on how wood preservative solution and especially freshly treated wood should be handled and stored. Such requirements should be taken into account in operational practices. Suppliers of wood preservatives will provide detailed advice on handling and use of their products including any BPR requirements.

3. TECHNICAL LITERATURE

The availability of technical literature is an essential requirement for the safe design and operation of wood treatment installations.

As a minimum requirement, operators of wood treatment installations should have up to date copies of information covering the following areas:

- The wood preservative product, including its specification, use and the properties of the treated wood
- Material Safety Data Sheets for all products and preparations used at the treatment plant
- A Plant Operation Manual, including information on maintenance and servicing.



4. MANAGEMENT SYSTEMS

The implementation of a formal and documented management system can greatly enhance the safe and efficient operation of a wood treatment installation. It can also be used to save money through reducing waste and raw materials and as a tool to prevent pollution.

Companies who wish to make a commitment to environmental best practice can do this by implementing a Certified Environmental Management System (EMS). The principal documents include ISO 14001 and EMAS for the Environment (https://ec.europa.eu/environment/emas/index_en.htm).

These systems can be combined with existing management systems, such as ISO 9001:2000 quality management systems to maximise benefits and minimise implementation costs.

Guidance and technical documents on achieving certification are available from national accreditation bodies and sector associations.

Areas in which policy documents, work procedures and process records should be created include:

- Health and safety policy
- Environmental policy
- Risk assessment, including fire safety risk assessment
- Document control (treatment records and stock movements). Written scheme of inspection (written system whereby safety control devices require inspection by a competent person)
- Routine maintenance, periodic servicing and security
- Emergency services
- Safety and environmental auditing (a documented EMS)
- Training records for plant personnel
- Records of assessment of condition of the ground (soil and groundwater) at the wood treatment site

5. ENVIRONMENTAL PROTECTION

Effective environmental protection at wood treatment installations can be achieved by adopting the following key practical actions:

PRODUCT AND PROCESS

- The principle of total containment should be followed during site design and applied to processing plant, wood preservative storage area and the holding area for freshly-treated wood.
- Any waste produced or handled should be disposed of safely in accordance with national regulations.
- Clean uncontaminated rain or surface water should be diverted away from the plant area.
- Periodically ask your supplier whether there are new or alternate products available which confer a similar level of durability on treated wood but are less hazardous.
- Periodically review the wood treatment process you use in your plant and see if you can optimise further to create less waste.
- It is recommended that the process operator prepares emergency plans and carries out practical exercises to test their effectiveness.



Process operator checks emergency preparedness.

Bunding (containment) of the wood treatment plant and wood preservative storage tanks

- A bund specification should be obtained from a competent person at an early stage in the development of the project proposal
- The treatment plant and its associated loading and / or unloading area and preservative storage tanks, drums or intermediate bulk containers (IBCs) should be located within secondary containment – generally provided by bunding.
- This bunding should be impervious to the preservative chemicals being used and made of, or sealed with, a substance resistant to the chemicals being used.



Bund area (containment) of the wood treatment plant and wood preservative storage tanks.

- It should also be strong enough to withstand the hydrostatic pressure when the bund is full of liquid, stresses induced by differential settlement and thermal shrinkage.
- The site operator should train one or more employees who are able to inspect the bund and report on its condition and to observe any leaks or areas requiring remedial action. The bunds should be periodically inspected and a record kept of each inspection. Ideally the plant bund should contain no liquid or debris so the bund walls and floor can easily be inspected.

Post – treatment containment and conditioning areas

- Process modification, wood packing in the vessel and good carriage design which prevents accumulations of preservative will all help to eliminate or minimise post-treatment dripping.
- A covered and/or contained and impermeable dripping area for freshly treated wood should be provided and be situated adjacent to the plant and the storage tank bund.
- Minimum holding times and other requirements may be specified in authorisation conditions and/or indicated by the preservative manufacturer before the treated wood may be moved from the treatment area.
- Operational practices to eliminate the spread of contamination via vehicle wheels or footwear are necessary to ensure environmental containment.

Storage of conditioned wood after removal from dripping area

- Dry treated wood should be stored in conditions that reflect its intended use class. Wood treated to Use Class 1, 2 or 3.1 (EN 335) should be protected from the weather. Dry treated wood intended for Use Class 3.2, 4 or 5 may be stored in the open unless preservative authorisation conditions or the preservative manufacturer require different storage conditions.



Under cover storage of freshly treated timbers.

Waste management

Wastes associated with wood preservation processes may be classed as hazardous waste and require to be disposed of accordingly.

The European Waste Catalogue (EWC) (Commission Decision 2000/532/EC) (<https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2000D0532:20020101:EN:PDF>) contains a list of all types of waste and each waste type is given a 6 figure code. Such wastes are likely to be:

- Redundant preservative solution
- Sludge and debris from tanks
- Sawdust and other materials used to soak up spills
- Redundant containers that still contain residues of the product
- Redundant plant and equipment (prior to decontamination)
- Contaminated water, e.g., rainwater
- Contaminated soil
- Empty wood preservative containers should be disposed of as recommended on the label or by the supplier.

Treatment autoclave with tilting cylinder.





Bulk delivery of wood preservative.

Deliveries of wood preservative product

- A trained representative of the receiving company should authorise and attend the delivery of the product, whether it is to be delivered in bulk quantities or smaller packages and containers.
- Deliveries should be made according to a written supervision procedure that includes a checklist covering all the safety-critical steps in the delivery process.

Other releases to the environment

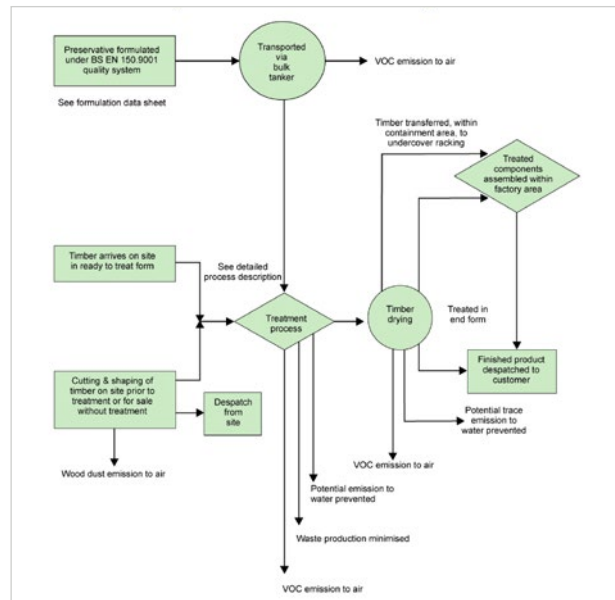
In certain situations, in addition to potential releases to controlled waters (including surface-water sewers or via foul-water sewers) or to land, process emissions to air may need to be controlled and/or require authorisations under environmental regulation.

6. PLANT AND EQUIPMENT SAFETY: GENERAL GUIDE FOR HEALTH AND SAFETY ASPECTS

- The process of wood treatment requires that consideration is given to the whole operation, including safe storage, handling, use, transport and disposal of wastes.
- Effective health and safety policies, arrangements and procedures should be prepared and properly implemented. These should cover the provision, use and maintenance of safe plant equipment, systems of work and health, and welfare facilities.
- Appropriate information, instruction, training and supervision are required.
- The safe operation of wood treatment plants depends upon sound design, regular maintenance and correct operation by trained competent operators.
- Plants and installations should be designed and constructed so they will be safe and without risk at all times during installation, use, cleaning and maintenance by persons at work.

Risk assessment

- Much health and safety legislation reinforces the need for the employer to review and control standards at work. This is to be achieved by the assessment of risks that arise from work activities and then either eliminate or reduce the risks to a reasonable level.



Defra Risk Assessment example.

Workplace environment

- The plant area should be maintained in a safe condition to minimise the risk of employees slipping or tripping.
- A system of regular checks should be implemented to ensure that standards are being maintained and sufficient time should be allowed for employees to carry out the necessary housekeeping work.

Metal safety walkways provide easy access to plant areas.





Autoclave door with safe locking device.

Treatment Plant Door Safety

If the wood treatment vessel door is not closed and fully locked during the treatment process it may be dislodged and blown open, either by internal pressure or by the weight of the wood preservative solution.

- The process should not be able to be started until the door is fully closed and locked.
- The plant should be equipped with a mechanism to give an indication of the internal pressure and presence of liquid in the vessel before the door is opened. If gauges are used these should be located next to the door and be easily visible from the door.

Treatment vessel working pressure

Pressure vessels should have a safety relief valve fitted to enable them to be operated safely.

- All vessels should be fitted with a safety relief valve set at a maximum of 10% above the maximum design pressure to act as the over-pressure relief valve unless the vessel design code permits a higher value.
- All vessels should be fitted with a second relief valve or alternative system to control the working-process pressure of the plant and this pressure should not be set above the maximum design pressure of the autoclave.
- In the case of pressure treatment plants either relief valves or pressure switches may be fitted to control the working pressure of the plant.
- All treatment vessels should be fitted with either a pressure or a vacuum gauge certified and checked on a regular (for example 12 month) basis; that give an accurate indication of the conditions inside the vessel and should be located next to the plant door and any gauges should be easily seen from the vessel door area.

Maintenance and examination

A planned written scheme of maintenance should be prepared by a competent engineer and followed.

- It is advisable that this written scheme should cover all protective devices, pressure valves and pipe work that could give rise to danger in the event of failure.

- Records should be kept of all routine maintenance, periodic servicing, examinations and remedial work.

Treatment vessel marking

The following information should be marked clearly on the vessel, or on a plate attached to it.

- The manufacturer's name.
- Serial number to identify the vessel.
- Date of vessel manufacture.
- The standard to which the vessel was built.
- The maximum design pressure and safe working pressure of the vessel.
- The minimum design pressure of the vessel, where it is other than atmospheric.
- The design temperature.
- Test date and test pressure.
- CE Mark in accordance with the Pressure Equipment Directive (2014/68/EU).

Storage and work tank marking

Storage and work tanks should be labelled with information about the product they contain and appropriate hazard labelling.



Storage tanks should display appropriate product and hazard labelling.

Storage and work tank safety

Tanks should have appropriate protection against accidental entry by workers and visitors

- These include tank covers, grids and/or the provision of fencing of suitable height.
- Safe systems of work should be provided where access to the tanks is needed, for example to retrieve items that have fallen into it.

Water supply

Mains water may be required to dilute a concentrated wood preservative to its ready for use form.

- There should be a siphon break (not reliant on non-return valves) in the water supply pipe to mixing tanks to prevent wood preservative solution from being sucked back into the water mains system as a result of a fall in the water supply pressure.
- A device or system should be fitted to prevent the overfilling of mixing tanks.
- Such a device could also include a device for pre-setting the water volume when preparing fresh treatment solution or diluting solutions. This minimises the risk of an overflow, even if a filling height shut-off is installed in the tank.

Occupational health and employee welfare

The treatment site should be a designated area into which no unauthorised person is allowed to enter.

Control of exposure to substances which are hazardous to health

Employers are required to ensure that the exposure of employees to substances hazardous to health is either prevented, or where this is not reasonably practicable, adequately controlled.

- Risks should be identified and appropriate control measures introduced.

These might include engineering control measures and/or adoption of another process.

- Employers should ensure that employees use the personal protective equipment described on the wood preservative product label or in MSDSs.
- Employees should regularly inspect their PPE and clothing and should report any defects to their employer without delay.

COSHH !

**CONTROL OF
SUBSTANCES
HAZARDOUS
TO HEALTH**

Manual handling and loading equipment

Manually moving items, for example by pushing or carrying, can potentially lead to injuries such as muscle strain and back pain.

- Such injuries can be eliminated by reorganising or mechanising handling operations.
- Employee training should be provided and continually updated for manual handling, moving aids or in driving fork-lift trucks.

Entry into treatment vessels (autoclave)

Entry in to treatment vessels may be necessary, for example, to retrieve pieces of wood or other debris from the treatment vessel. A documented permit to work system should be operated and any person who enters a vessel should be trained and competent in the procedures and use of equipment necessary to work safely inside the treatment vessel. Treatment vessel entry should be done with a minimum of two trained personnel with one on standby with the means of rescue already in place e.g. harness and rope as a minimum.

Training and staff awareness

Treatment plant operators and management should receive adequate information, instruction, training and guidance in the safe and efficient use of wood preservatives and be aware of the precautions to avoid exposure to the wood preservative.



Training and guidance in the safe and efficient use of wood preservatives and handling of treated wood products is essential.

Health surveillance

A risk assessment might identify that health surveillance is necessary. The purpose of health surveillance is to detect as early as possible adverse health effects caused by exposure to hazardous substances or practices. Health surveillance should be carried out in accordance with national workplace legislation and guidance.

Welfare facilities

- Employees should have easy access to suitable and sufficient washing and changing facilities.
- Separate facilities should be provided where workers can rest, eat and drink away from the risk of contamination.

Working alone

The operator of a wood treatment plant may work alone or there are times when a contractor is on site working alone. Wood treatment companies should have procedures in place to ensure the health and safety of such workers.

Fire precautions

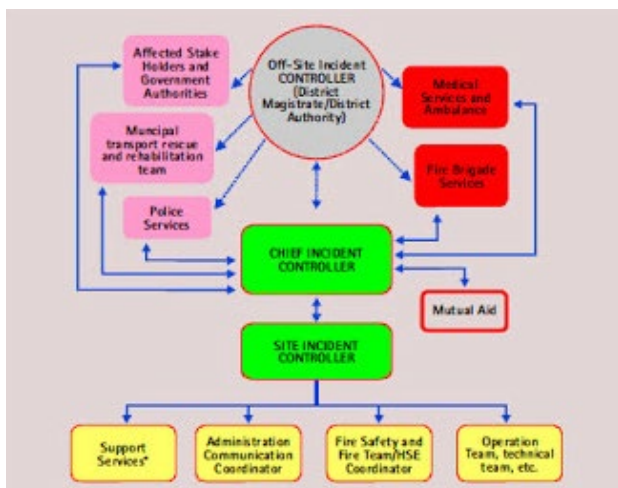
The outbreak of a fire at a wood treatment installation not only involves potential injury to personnel, losses and damage to property but also the risk of causing environmental pollution.

- Carry out a fire-risk assessment of your workplace, identify and record your findings.
- Decide on the nature and extent of the general and wood preservation plant and process fire precautions that are required.
- Employees should receive regular training based on the particular features of the workplace location.
- Damage to watercourses or groundwater may arise from the direct spillage of wood preservative solution and also from water run-off during firefighting and procedures should be in place to prevent such an event.
- Electrical equipment (e.g., pumps and switchgear) should be located in a safe position and/or be intrinsically safe.

7. EMERGENCY PREPAREDNESS AND RESPONSE PROCEDURES

The following information should be readily available.

- A notice at the site entrance showing the location of relevant emergency instructions.
- An on-site emergency plan that details the necessary action in the event of a spillage or fire. Some sites, in accordance with local, national or EU regulations, may need to co-operate with the local authorities in the production of an off-site emergency plan. Periodic on-site emergency exercises are recommended.



An on-site emergency plan is essential.

- An up-to-date inventory of all wood preservative chemicals and quantities stored on site should be available. The inventory should include a site plan that shows the location of such products as well as the on-site drainage system.

Notification of health and safety incidents

Wood treatment companies should report certain accident, disease or dangerous occurrences to the appropriate authorities.

Notification of environmental incidents

Site management should report to the relevant authorities all incidents that have the potential to damage the environment, including spills that soak into the ground.

8. IMPORTANT EU LEGISLATION RELEVANT TO THE WOOD PRESERVATION INDUSTRY

Each Member State may implement EU directives in different ways according to national legal requirements and custom and practice. EU regulations apply directly and do not require national implementing legislation. In some member states, local or national legislation may also apply to the design and/or operation of wood treatment installations.

The following list of EU directives and regulations is a compilation of important legislation of relevance to the wood preservation industry. Note EWPM/WEI do not warrant that this is a complete and up to date list of all applicable legislation. Wood treatment companies should satisfy themselves that they are aware of and are complying with all relevant legislation.

HEALTH AND SAFETY

Council Directive 89/654/EEC on the minimum health and safety requirements for the workplace.

Council Directive 89/656/EEC (30/11/89) on the minimum health and safety requirements for use by workers of personal protective equipment (PPE) at the workplace. Amended by Directive 2007/30/EC.

Regulation (EU) 2016/425 on personal protective equipment.

Council Directive 89/655/EEC minimum health and safety requirements for work with display screen equipment.

Amended by Directives
95/63/EC
2001/45/EC
2007/30/EC

Regulation (EU) 2016/425 of the European Parliament and of the Council of 9 March 2016 on personal protective equipment and repealing Council Directive 89/686/EEC.

Directive 2009/104/EC – use of work of 16 September 2009 concerning the minimum safety and health requirements for the use of work equipment by workers at work.

Council Directive 90/269/EEC on the minimum health and safety requirements for the manual handling of loads when there is a risk, particularly of back injury to workers. Amended by Directive 2007/30/EC.

Directive 2001/41/EC 21st amendment to 76/769/EEC

2003/34/EC 23rd amendment to 76/769/EEC

2003/36/EC 25th amendment to 76/769/EEC

2003/37/EC protection of workers

(these directives deal with carcinogens and mutagens)

Council Directive 98/24/EC protection of the health and safety of workers from risks related to chemical agents at work. Amended by Directive 2007/30/EC.

Council Directive 2003/10/EC on minimum health and safety requirements regarding exposure of workers of workers to risks arising from physical agents (noise). Amended by Directive 2007/30/EC.

Council Directive 92/58/EEC minimum requirements for the provision of health and/or safety signs at work.

Council Directive 2002/44/EC on the minimum health and safety requirements regarding the exposure of workers to the risks arising from physical agents (vibration).

ENVIRONMENT

Waste

Regulation (EC) No. 166/2006 establishment of a European Pollutant Release and Transfer Register (amending the Directive 96/61/EC – the IPPC directive).

Council Directive 2004/35/EC environmental liability with regard to the prevention and remedying of environmental damage.

Directive (EU) 2018/851 of the European Parliament and of the Council of 30 May 2018 amending Directive 2008/98/EC on waste.

Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control).

Directive 2007/76/EC on the incineration of waste.

Council Directive 91/689/EEC on hazardous waste. Amended by Directive 94/331/EEC.

Regulation (EC) No. 166/2006.

Council Directive 75/349/EEC on the disposal of waste oils. Amended by Directives 1987/101/EEC, 91/692/EEC

2007/76/EC

Directive 2012/19/EU of the European Parliament and of the Council of 4 July 2012 on waste electrical and electronic equipment (WEEE).

Air Quality

Directive 2008/1/EC concerning integrated pollution prevention and control.

Council Directive 1999/13/EC on limitations of emissions of volatile organic compounds due to the use of organic solvents in certain activities and installations. Amended by Directive 2004/42/EC.

Water Protection and Management

Directive 2000/60/EC establishing a framework for Community action in the field of water policy.

Directive 2006/118/EC on the protection of groundwater against pollution and deterioration

Council Directive 80/68/EEC protection of groundwater against pollution caused by dangerous substances

Soil protection

See also waste and IPPC.

CHEMICAL PRODUCTS

Directive 2006/121/EC and amendment Of 67/548/EEC and their adaptation to Regulation No. 1907/2006 regarding Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) and establishing a European Chemicals Agency.

Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006.

Regulation (EU) No 528/2012 of the European Parliament and of the Council of 22 May 2012 concerning the making available on the market and use of biocidal products.

CONTROL OF RISKS

Directive 2012/18/EU of the European Parliament and of the Council of 4 July 2012 on the control of major-accident hazards involving dangerous substances, amending and subsequently repealing Council Directive 96/82/EC.

Directive 2007/60/EC on the assessment and management of flood risks.

EWPM

EWPM was formed in 1977 to create a focus for European wood preservative manufacturers to respond to developments in the standardisation and regulation of their products. It is governed by its Statutes most recently amended in 2008.

The aim of the EWPM is to promote, with integrity, the correct use of wood preservatives including production, transportation, utilization and disposal, by all means including but not limited to:

- taking any appropriate measures which are legal and are the decision of the voting members.
- acting on behalf of members, to promote an agreed position in all technical, scientific, regulatory, health, safety and environmental protection domains which interest the industry, directly or indirectly, with particular regard to Europe.

Wood preservative products supplied by EWPM members are manufactured under Quality Assurance procedures, typically EN ISO 9001:2008.

This Code, whilst not statutory, is intended to reassure the regulatory authorities and the public of a company's commitment to comply with current legislation and to the process of continual improvement in health, safety and environmental performance.

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EUROPEAN INSTITUTE FOR WOOD PRESERVATION (WEI-IEO)

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The UK Wood Protection Association (WPA) publishes a Code of Practice: Timber Treatment Installations.

EWPM and WEI-IEO acknowledge with thanks the assistance of the WPA in making its Code of Practice available as a model for the development of this European Code of Practice.

The WPA Code of Practice may be obtained from the WPA – www.thewpa.org.uk

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