



Public consultation on the use of in-situ generated nitrogen for pest management of cultural heritage

Dear members and friends of E.C.C.O.

We urgently call for your support and expertise concerning the public consultation on the use of in-situ generated nitrogen for pest management of cultural heritage!

Link to the Public Consultation form:

http://comments.echa.europa.eu/comments_cms/PCCulturalHeritageDerogation.aspx?SubstanceName=In-situ%20generated%20nitrogen&ProductType=3,4&ECNumber=-&CASNumber=-

Further information on the consultation:

<https://echa.europa.eu/derogations-for-the-protection-of-cultural-heritage/-/substance-rev/24401/term>

Deadline is: 18/01/2020

Background:

The EU regulation 528/2012 (Biocidal Products Regulation) lists Nitrogen as a biocide and therefore bans its unregulated use in pest management. The well introduced and save method of producing Nitrogen in-situ by generators to create an anoxic atmosphere in tents or even small bags cannot be used anymore by conservator-restorers and museums to keep their collections pest free.

Alternatives proposed by companies with apparent commercial interest are either toxic for persons working with the objects (e.g. Conservator-Restorers) and harmful to the environment (gases like Sulfuryl fluoride or Hydrogen cyanide). Or it can damage objects by chemically reacting with materials. The also proposed heating or freezing method causes thermal stress and damages heat sensitive materials. None of these methods can be safely applied to such a wide scope of materials as Nitrogen.

The only legal method of using Nitrogen in ready-for-use canisters is licensed to a single company. The very expensive licence leads to a defacto monopol and the method has different levels of inappropriateness:

- 1- the relative humidity needed for a save procedure cannot be adopted during the treatment with canisters,
- 2- only one provider has the expensive license in consequence
- 3- Nitrogen canisters are not sold to be used by others
- 4- the infrastructure of the single provider is not sufficient for a guaranteed in time treatment, means the pest management will not be reliably for collections anymore
- 5- the refill of the canisters is expensive
- 6- this deficit cannot be compensated in time and in financial budget of museums

In-situ generated Nitrogen is the less harmful for the invaluable objects, persons and environment, while the most effective in anoxic treatment.

For more detailed information please see the detailed statement from ICOM UK
<https://uk.icom.museum/news/view?title=/icom-uk-urges-the-eu-commission-to-re-establish-ability-of-cultural-heritage-organisations-to-use-nitrogen-for-conservation-treatment/>

and the most recent joint statement by ICOM Europe and ICOMOS including a sample letter

<https://icom.museum/en/news/icom-icomos-unite-in-call-to-allow-the-use-of-nitrogen-for-the-protection-of-cultural-heritage/>

After series of letters and statements from organisations as ICOM, ICOMOS and NEMO, and hearings at the EU Commission in Brussels, this public consultation seems the last chance to obtain a derogation for the Nitrogen ban and allow the use of in-situ generated Nitrogen for pest management for the good of the cultural objects, the persons concerned, the financial aspects in the cultural sector and the environment – for a sustainable Europe!

E.C.C.O. fully supports the Austrian request for a derogation and enlarges it throughout Europe!

Please, take part in the public consultation and make use of the linked documents for reference of reasoning. Feel free to add other documents with good arguments and chain of evidence to clear up, why there is no better pest management for collections than in-situ generated Nitrogen.

Be part of the cultural heritage community to make sure, that we re-establish this tool for safeguarding our cultural heritage, even if you do not use it yourself.



- Take part as individual!
- Take part as organisation!
- Share with your network!
- Share it on social media!

- Thank you for your commitment!

- Your E.C.C.O. Committee

#EuropeForCulture #ClimateHeritage #ECCOCommunity

Siège social: rue Coudenberg 70, BE-1000 Bruxelles, Belgique, Entreprise N° 0447.118.530