

## **Appeal on the European ban on the use of nitrogen for disinfestation**

*To be announced at the ICOM EUROPE General Assembly, September 2019*

Museum collections, castles and historic houses all over Europe are frequently challenged by pests due to high humidity, changed climatic conditions or various forms of contamination. For several years, the standard response has been various disinfestation procedures ranging from treatments with yesterday's chemical products to more sustainable methods of today – where the use of hazardous chemicals is avoided.

The most versatile and eco-friendly method of disinfestation is “anoxia” or modified/controlled environment with an extremely low oxygen content in a chamber or tent, which aims to eliminate insect infestation in cultural heritage objects at all stages of development.

The modified/controlled environment is created by replacing the oxygen with an inert gas (for example nitrogen, helium, argon and carbon dioxide), and nitrogen is the most frequently used gas for this process.

The displacement of atmospheric oxygen is a well-established method, and – unlike other sustainable disinfestation methods – it can be used on almost any cultural heritage material. The procedure is included in the European Standard EN16790:2016 *Conservation of Cultural Heritage - Integrated pest management (IPM) for protection of cultural heritage*. IPM is currently being used worldwide, as it is more sustainable and considerably reduces the risks for the heritage objects and for the professionals dealing with them. Many institutions have invested in treatment chambers for anoxic disinfestation, for both prophylactic and acute pest elimination.

Since the mandatory registration of the use of nitrogen for disinfestation purposes by the biocidal products regulation EU 528/2012 in September 2017, only one method of nitrogen use (along with several other restrictions) has been acknowledged and included: nitrogen in cannisters. The use of in situ generated nitrogen in anoxia chambers has not been included. Because of this legislative flaw, existing anoxia facilities in Europe can no longer be used. As a result, the cultural heritage institutions are facing the acute danger that cultural heritage may be damaged or irretrievably lost, and are being forced to write off the investments they made.

In summary, the nitrogen ban is not justified for health reasons – but only because of legislative and procedural reasons. It is a significant setback for the cultural heritage conservation community to have less choice of treatments, as the anoxic treatment is among the most compatible with many materials and objects. Finally, the ban is also economically damaging the market of European stakeholders in the IPM business, favoring less sustainable and riskier treatments.

Therefore, ICOM and ICOMOS and their National Committees have jointly called upon the National Ministries, the European Parliament and Council, to repeal the classification of nitrogen as a biocidal active substance across the European Union as soon as possible.

The current strategy that ICOM has taken on this issue is the following:

- 1) We advocate for nitrogen to be removed from regulation EU 5128/2012 as we do not consider it an active or harmful substance
- 2) We strongly urge all European countries to apply for derogation from the ban of in situ generated nitrogen for anoxia treatment of cultural heritage objects and art-related collections. 55(3) in the EU 528/2012. This action must be taken at a national level.
- 3) As a last resort, we aim to have in situ generated nitrogen registered as equivalent to the present use of nitrogen in canisters with very few restrictions and covering all member states.

We therefore urge you to contact your respective National Committees and national ICOM-CC members, conservators and others who work with the care of the collections in your museums and inform them about this initiative – whether or not they work with IPM and anoxia treatment. We need their support for ICOM's efforts to repeal the ban on nitrogen and we need this support to come from all European countries where anoxia facilities are in use or are being planned.

We would also be extremely grateful for your feedback; please report back to ICOM on the situation in your countries; are any of the museums dealing with IPM and anoxia treatment? Who is in charge of this and can be contacted? Will you support our initiative? Even if it does not seem directly relevant to you, your information is important to us.

Additionally, we urge the ICOM National Committees who have not yet done so, to contact the relevant authorities in their country and ask them to apply for derogation from the ban on nitrogen. Some ICOM National Committees have already done this - so ICOM can assist you by sharing templates for letters, as well as experiences so far in this process.

Please, report back as soon as possible! And don't hesitate to ask us if you need further clarifications.

Thank you!

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