



Creosote Treated Products – FORT Merchanting Ltd

Creosote is a hazardous product; while it is still very popular, especially within the Equine sector, there is an ongoing 'ambition' for the UK government to ban its use. This has already occurred within the EU. The end date keeps being moved back but currently appears to be somewhere around 2029.

FORT Merchanting recognises that creosote treated timber products will be an integral part of the overall requirements for a significant number of its experienced fencing contractors and we therefore need to have a policy that ensures our staff, Customers and (as far as we can manage) their clients have a managed risk of contamination to them or their property. This does include making clear what those hazards are and our recommendations, but ultimately we can only advise (apart from with our staff where mandatory requirements will be put in place).

This document attempts to set out our policy; we recognise that it is a 'living document' and will need constant updating, as new regulation arrives, or improved and adjusted working practices take place. It is therefore not an exhaustive list of requirements and we welcome feedback so that it can be continuously improved.

The document covers:

- Hazard awareness
- PPE requirements
- Ordering of materials
- Receipt of materials – collected, or delivered
- Storage & Signage
- Selection, reloading - to Customer vehicle or our vehicle
- Delivery and unloading

Hazard Awareness

Please read attached document from this link [Typical/Generic Creosote Data Sheet](#). As you can see, it sets out a range of points that you need to be aware of, including:

- Only to be used by professional operators
- External Use Only
- Skin & Eye Irritation Risks
- Carcinogenic
- Potential Fertility Issues
- Possible Respiratory Issues (in confined, enclosed spaces)
- Environmental Impact, Especially If Used in Water or Water Courses

Like other pressure impregnation treatments, many of the main hazard's centre on the chemicals applied during treatment. Once the chemicals are 'set' and any residual liquid has dispersed, the final treated timber product is a far lower hazard, although it does continue to have hazardous risks.

Most of these are around manual handling and touching the treated products with bare hands, or through rubbing against clothing, lifting straps and other materials. From there eye irritation will be the next most common issue (where people rub their eyes). It's therefore important to have separation between each of these elements.

PPE Requirements

- Protective Gloves – these are a very important and basic requirement. They should be used at all times to ensure that creosote does not cause any of the associated problems mentioned above. Gloves need to be impermeable (for example, Rigger type gloves are NOT suitable).
- One of the key points is to ensure that cross-contamination is avoided, by removing/replacing gloves correctly: [Gloves On/Off Policy Guidance](#) In short, wash gloves before putting back on.
- Overalls – FORT Merchating staff will be required to wear overalls when handling creosoted products within our yard operation. This is to ensure that personal clothing is not contaminated and to also ensure that there's minimal likelihood of any skin contact. These overalls will need to be washed on FORT premises, in a dedicated washing machine (Unit B).
- FORT recommends the use of overalls at all stages of the supply chain.
- Eye Protection – given all of the information around creosote being 'fixed' prior to receipt, it is felt that eye protection is not required. Indeed it could potentially cause more problems through eye contact as goggles/glasses are put on/taken off.
- Hi Vis, Safety Boots. These are part of the standard requirement for all staff involved in yard and vehicle operations. Separate washing of High Vis (see overalls) is recommended. Hands should be washed immediately after putting on/taking off safety boots, in case of residual creosote on laces, etc.

Ordering Of Materials

FORT Merchating will carry out Pre-Contract assessment of suppliers to ensure that materials are purchased in accordance with our requirements. The main requirement will be 'setting or fixing' of treatment into the timber, prior to collection by ourselves, or delivery onto our sites (and directly to Customers). Customers should be aware of the need for this and should advise FORT Merchating immediately after inspection if there is any doubt, so that checking can take place. Ultimately it may be necessary for the material to be returned and quarantined until 'setting/fixing' has been completed. As recognised professionals, FORT Merchating expects all Customers to be able to make this assessment.

Documentation will emphasise that any material supplied MUST have rested for a satisfactory period of time to ensure 'fixing/setting'.

Receipt Of Materials – Collected

This procedure is intended to ensure that any creosote treated timber product collected by FORT, for onward transport (to our yard or to a Customer) is handled in a satisfactory manner, ensuring safety and eliminating cross-contamination.

Upon arriving at the collection point the driver should make a visual check of the material. Evidence of liquid run off or overt 'wetness' will raise concerns and the driver will need to bring this to the suppliers' attention. They should also contact the purchasing office at FORT Merchating to seek advice.

Using the PPE guidelines (see above), providing that loose material is not being handled and that all lifting is mechanical, the driver only requires gloves (gloves on/off procedure). Ideally (if crane lifting ourselves) a separate set of 'creosote straps' (separately bundled and wrapped) should be used, but wherever possible all loading should be by supplier mechanical handling.

Creosoted product must not come into contact with other goods. If there is any risk of such, separation needs to be ensured by use of plastic/cardboard/non-permeable sheeting.

Storage & Signage

The site entrance needs to have adequate and clear signage emphasising that correct PPE MUST be worn at all times within the specific area, when handling creosoted timber products. This must also make clear that it applies to our staff, contractors & Customers.

Whilst unlikely, storage of creosoted timber products in ground/soil contact could potentially, over a very long period of time, create a build up of creosote, by leeching, thereby causing some, if any, ground contamination.

Storage therefore needs to be dealt with in a way that identifies potential leeching and reduces the risk significantly or eliminates it.

First and foremost, creosoted timber products should be stored off the ground. This can be done in a variety of ways (stillages for example, where loose items are required) but mainly through the use of timber sleepers.

The sleepers also need to sit on a very heavy gauge (possibly double skin?) non-permeable polythene/DPC. This creates two 'barriers':

1. An early warning of run off, as liquid can be seen
2. By stopping any small residual weeping of liquid from falling onto soil/ground

These areas need to be clearly identified on a site map and separated from other materials, so that they never undergo cross-contamination. It also needs to allow sufficient space for back up and special section arrivals/dispatch.

All FORT staff involved in working with creosoted timber products need to be made aware of the importance of segregation and all relevant handling requirements.

Receipt Of Materials, Delivered

In reality, there may be occasions where creosote treated material does come into ground contact on site, but this needs to be reduced/eradicated; if it happens there needs to be a plan to move the material to an above ground location as rapidly as possible.

When goods arrive they must be checked for 'fixing and setting' immediately. Any evidence or concern that product is 'wet', dripping or shedding liquid needs to be brought to the attention of management, immediately. If this is considered to be hazardous the vehicle needs to be removed from our premises immediately. The supplier should then be contacted and a quarantine period or full replacement should be agreed. Take photos as evidence.

On the basis that the material is within acceptable limits unloading can take place.

The products should be checked to ensure that strapping, banding or palletisation and packaging is adequate for handling and storage. Should there be any concerns, rebanding/strapping needs to take place before moving material.

Wherever possible, all handling should be mechanical, to reduce or eliminate physical contact.

Product should be taken directly from the vehicle to the designated storage area(s) (see storage).

Where stillages are used, manual handling is more likely – therefore a far higher level of care needs to be taken.

Selection & Reloading – Customer Vehicle & Our Vehicle

Upon receipt of a yard picking order, the team need to select the required items. Where these are in full packs, this is a very straight forward operation, as mechanical handling will be used.

The Customer, as an experienced user of this material, will have their own level of adequate PPE. If there is any concern or uncertainty, any FORT operative can contact their Manager and seek advice about allowing their assistance or involvement.

Where loose items are required, ideally they should be made into a set, banded/secured, and then mechanically lifted onto the Customer vehicle.

If items are selected and then loaded loose, providing that the Customer has adequate PPE, goods can be loaded manually using two people where needed, but manual handling needs to be kept to an absolute minimum.

Once loaded it is up to the Customer to ensure that there's no cross-contamination on their vehicle. Because they will be an experienced user, it is taken that the Customer will have any necessary protective packaging.

Where goods are being loaded onto our vehicle, if it is a mechanical process then the driver only needs to wear gloves, in case of contact. If manual handling is involved where the driver needs to assist, they also need to wear overalls.

Once loaded, the driver needs to ensure that no cross-contamination occurs, either by clear separation from other goods, or by the use of protective sheeting (see Receipt of Materials – Collected).

All creosote treated timber MUST be on the bed of the lorry.

Strapping and securing of creosoted timber products can easily cause contamination of straps. This can be eliminated by use of protective polythene/other impervious packaging, or a separate set of 'creosote straps' must be used that are stored separately and away from all other materials (i.e. a separate box or locker). If the driver feels there is any likelihood of any manual handling of creosote product, they can take a 'Creosote Manual Handling Kit' with them, which MUST be returned at the end of the day.

If creosote treated timber products are loaded onto a vehicle that doesn't have crane facility and it's clear that there'll be a requirement to manually unload, the driver MUST take a 'Creosote Manual Handling Kit' with them, to be returned by the end of the day.

Delivery & Unloading

Upon arrival at the site, wherever possible goods should be mechanically unloaded, to minimise all manual handling. Because the Customer is an experienced user of these materials, it is their responsibility to manage risks around ongoing storage and handling (see earlier elements of this document). The FORT driver must wear gloves during this procedure, in case of any contact.

If manual handling is involved, the FORT driver must wear overalls. It is the Customers' responsibility to manage their handling and PPE, as experienced users of these products.