

## **Technical Note – APVMA CCA Review**

On 15 March 2005, the Australian Pesticides and Veterinary Medicines Authority released its final review on the use of CCA in Australia. From midnight 11 March 2006, increased restrictions on the use of CCA will be in place. Below is a summary of the main points relevant to this issue.

### **Chemicals affected by the review**

The following Koppers Arch products are affected;

Tanalith CP, Tanalith C, Tanalith O

### **Scope of Review – Affected Users**

The APVMA has direct jurisdiction over the sale of CCA in Australia and some influence over CCA treated timber use. Preservative manufacturers (Koppers Arch) and treaters are therefore directly subject to the outcomes of this report. End users of CCA treated wood are under no obligation to comply with the report rulings but it is expected that other regulatory changes (e.g. Building Code of Australia) will be implemented by March next year, thus restricting end users ability to use CCA treated timber for restrained uses.

### **Enforcement Date**

All CCA treaters must comply by 11 March 2006. The delay is to allow treaters to phase in changes to their operations.

### **Requirements for Treatment Plants**

- must not treat timber intended for garden furniture, picnic tables, exterior seating, children's play equipment, patio and domestic decking, and handrails (restrained uses)
- must treat timber to the correct retention for the hazard level branded
- must label (brand) most pieces of CCA treated timber including the statement "TREATED WITH COPPER CHROME ARSENATE"
- must hold timber on the drip pad until drip free
- must hold timber in a bunded area or under roofing until fixed
- must not exceed environmental runoff limits

- must contain all CCA containing or contaminated liquids within the plant area
- must not burn CCA treated timber
- must not allow CCA treated sawdust to be used for animal bedding

The following FAQ contains further details on the above points.

## **FAQ – APVMA Review.**

### **How does a treater prevent customers from using CCA treated timber from a restrained use?**

It is difficult to predict where many treated timbers may be used, particularly boards etc. Treaters should notify all of their customers of these restrictions to ensure they are aware of their responsibilities. It is expected that by the time the phase in period is complete, other documents such as the Building Code of Australia, TUMA, TMA, Government purchasing guidelines etc. will have been modified to reflect the APVMA label requirements.

Ultimately, a treater cannot control every piece of timber treated at their facility. The APVMA recognises this and will not take action against a treater because an end consumer has incorrectly used the treated product.

### **What happens to existing CCA structures?**

The APVMA has no jurisdiction over existing structures and therefore cannot make a ruling about their use. However at this time they are not recommending that existing structures should be removed. Copies of the APVMA report will be forwarded to State authorities who will decide the fate of existing structures.

### **What are the Labelling Details?**

Each timber piece treated with CCA must be legibly and durably marked (at least to the point of the first person who uses the treated timber) with a treating plant identification number, hazard class and chemical number. This is the standard brand identification as required by TUMA, TMA and AS1604.

Each timber piece must also have marked the statement “TREATED WITH COPPER CHROME ARSENATE”. This may be included on the brand label.

There are exceptions to the above rule for difficult to brand products that shall be pack marked;

- a) Battens fence palings and droppers
- b) Timber 1500mm<sup>2</sup> and less in cross section

c) Timber with less than 15mm nominal sawn thickness dimension.

Koppers Arch is in the process of applying for an additional piece marking exemption

d) Timber to be consigned for a specific enduse that is not a use prohibited under "RESTRAINTS"; i.e. vineyard posts or power poles that are not for retail sale

### **How are imported timbers regulated?**

The APVMA has no power to regulate these products and will rely on the BCA, TUMA, TMA, and Government purchasing policy to limit non complying CCA timber from entering the Australian domestic market.

Some wholesalers have indicated that they do not intend to import CCA treated timber that is listed under RESTRAINTS. This is likely to eliminate this problem.

### **Do the review provisions apply to export timbers?**

Users of CCA in Australia must comply with the APVMA label requirements so all export related activities must also comply.

### **What is the drip pad holding time?**

CCA treated timber must be held on the drip pad until it is drip free. There are no holding times defined.

### **Where should unfixed, drip free timber be stored?**

While the fixation process is occurring, the storage of CCA timber must be managed in such a way that stormwater runoff limits are not exceeded. This might be achieved by controlling stock levels, accelerating fixation, storing in a bunded area with provision for collecting and processing drainage water, or storage under a roof that prevents rainwater contact with the timber.

Other methods may also be suitable however water contaminated by CCA must not enter natural watercourses, or water bodies, or reach groundwater except as provided for by State or Territory authorities and/or planning authority (e.g. EPA).

### **When may CCA treated timber be sold?**

CCA treated timber must be held until it has fixed. Currently, this is defined as being a pass using the Merck test defined in AS2843. If you have any questions about this test, ask your Koppers Arch technical representative for more details or a demonstration.

**Can CCA IBC's be stored in another shed prior to use?**

No, all CCA liquid must be kept within the plants banded area.

**What are the options for disposal of CCA treated off cuts or sawdust?**

All CCA off cuts and sawdust must be disposed of through landfill. Sawdust is no longer permitted for use as animal bedding.

Burning is permitted but there must be no discharge of arsenic and this must be conducted in an incinerator designed for the purpose of burning CCA waste. In all practical terms, burning of CCA treated timber is now no longer possible without considerable expenditure and testing.

**Are there new chemical retention requirements?**

There are no changes from what is already listed in AS1604 however retention values will be mandatory and non compliance will be an offence that APVMA can take action on.

**Is this the last we will hear of this issue?**

No. We are expecting the APVMA to commence separate proceedings that will ultimately result in CCA being declared a Restricted Chemical Product (RCP). Treaters will then be required to be certified before being able to purchase CCA. The details for certification are yet to be finalised. It is expected that one of the requirements will be for plant operators to have completed competency training such as Koppers Arch annual Plant Operators Course. State authorities may also impose additional requirements that control the use of RCP such as full compliance with AS2843. Plants that do not comply with all aspects of AS2843 may then be forced to cease operations unless compliant.

Koppers Arch have requested further information from APVMA regarding the RCP process and will provide an update when available.

APVMA also is intending to introduce a system of mandatory monitoring of employee health for workers involved with CCA use. No details of what is proposed have been presented to date.

**Further questions?**

Treaters should contact their Koppers Arch account manager. Alternatively, queries may be directed to the author below.



Koppers Arch will update our web page with details as they occur. Please refer to [www.tanalised.com](http://www.tanalised.com)

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