



A3P Member Information Bulletin

CCA as a Restricted Chemical Product

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The CCA review outcomes

The Australian Pesticides and Veterinary Medicines Authority (APVMA) is the federal government body responsible for the registration of all wood preservatives. The APVMA regulates their use up to the point of sale of the treated timber.

The APVMA recently reviewed CCA as a timber treatment, reinforcing its status as a safe, durable, and inexpensive way to preserve wood for most outdoor purposes. However, the APVMA imposed some restrictions on what CCA may be used for: from 12th March 2006, CCA preservative chemical may not be used for treating timber intended for use as garden furniture, picnic tables, exterior seating, children's play equipment, patio and domestic decking boards, and handrails.

All other timber may continue to be treated with CCA, but these products must be marked with the words "Treated with Copper Chrome Arsenate".

The APVMA changes to CCA use are being made through variations to the preservative's registration label. The label instructions are legally binding on the chemical suppliers as well as the chemical users, i.e. the treaters in Australia.

The APVMA determination that CCA be designated a Restricted Chemical Product

In addition to the above restrictions on what timber products can continue to be treated with CCA, and the marking requirements, the APVMA changes to CCA use are being made through variations to the preservative's registration label. The label instructions are legally binding on the chemical suppliers as well as the chemical users, i.e. the treaters in Australia.

CCA is to become a Restricted Chemical Product or RCP. An RCP is a chemical that the regulator believes may possibly have a harmful effect on people, animals, plants, or the environment. The APVMA makes these decisions in the public's interest, and it requires skilled operators using specialized equipment for the safe use of such chemicals.

The RCP status for CCA means that it can only be supplied to or used by authorised persons having the necessary training to use it by employing special equipment, i.e. an industrial preservative treatment plant. A treatment plant largely complying with AS/NZS 2843-2006 has been deemed by the APVMA to be the bench mark for such operations.



Authorised persons are determined by relevant state or territory authorities, and they must have special skills or knowledge in the preparation or handling of the chemical, which at all times must be used safely.

Examples of other RCPs in the preservation world include soil treatment termiticides containing chlorpyrifos or bifenthrin.

How the RCP status for CCA affects treatment operations

Preservative treatment plants require specific licences and/or approvals to operate, and these requirements vary from state to state. For example, in NSW plants producing more than 10,000 m³ of treated timber per year require a specific licence, while smaller operations need other forms of approval; in Queensland, all plants must have a specific licence to operate, regardless of size; in Victoria plants must have EPA approval and a Dangerous Goods permit; other states have their own requirements that usually involve the appropriate EPA department.

A treatment plant cannot legitimately use a Restricted Chemical Product without the state in which it operates legislating or authorising the use of that chemical. Thus, the RCP status of CCA is dependant upon enabling legislation from state and territory authorities that govern the operations of treatment plants. After this time the CCA manufacturers will not be able to supply the preservative to other than authorised persons, who have successfully completed accredited training in handling and use of the chemical. In addition, the APVMA has indicated that treatment plants using CCA should largely comply with the requirements of plant design and operation, as set down in the AS/NZS 2843, Parts 1 and 2, and it is expected that the enabling legislation enacted at state level will include this requirement.

Individual treatment plants may be able to negotiate the issue of RCP licensing for CCA with the appropriate state departments and authorities, however it is unclear at this stage what each state authority will require. The departments and authorities responsible vary from state to state and a guide to the appropriate regulatory

authorities can be found in Appendix A of AS/NZS 2843.2-2006. At the time of writing, it is expected that the RCP will come into effect towards mid-2007.

What an operator must do to comply with RCP status

All plant operators using CCA will need to be trained in its use and must have undertaken such training by completing an accredited course. The course will have been audited by third party assessors and should be provided by bodies registered with state or territory authorities to offer accredited training for Vocational Education and Training sector courses.



Examples of such courses can be found in the Forest and Forest Products Industry training package (FP199) of the government approved national training organisation, FAFPESC (a national skills company provider for the Forestry and Forest Products, Furnishing and Pulp & Paper Industries). This organisation provides specific training over a wide range of forest industries activities.

The preservation modules can be found in the Sawmilling and Processing Units of Competence and are designated: FPIS2007A, *Conduct timber treatment plant operations*; and FPIS3040A, *Optimize timber treatment plant operations*.

Registered training bodies may include private providers, and, in the case of CCA, the suppliers may offer their own accredited training course for plant operators that very much mirror the above courses, and may also include specific training in applying and handling the CCA chemicals.

The APVMA has advised that there will be a period of twelve months for treatment plant operator training to take place, following the commencement date of the RCP status for CCA.

How treatment plants might achieve compliance

A treatment plant wishing to continue using CCA after the RCP status comes into effect must comply with the broad requirements of design and plant operation as set down in AS/NZS 2843.1 & 2-2006 *Timber preservation plants*.

For CCA preservative the principle operational issues to be addressed are mainly related to dripping and fixation of the treated timber stock. The requirements are to hold freshly treated timber on the treatment plant drip pads until dripping has ceased. After this time the treated timber may be moved in such a way that any wash-off of unfixed CCA can be managed to prevent possible environmental contamination. This means keeping the treated timber covered until fixation is

complete so that rain water cannot run off the timber surfaces carrying unfixed CCA chemical into storm water drains and the like.

The specific clause in the standard that addresses the above issue is 3.7.2, to be found in Part 1, and it requires that:

CCA-treated timber, in which the preservative is still undergoing CCA-fixation, shall be managed such that any leached CCA preservative is prevented from falling onto parts of the timber preservation plant site that are either unsealed, or not within a storm water collection and treatment system.

Fixation must be measured by operators applying the Merck test, as described in Appendix C of Part 1 of the standard. It therefore follows that some training in using the Merck test must be obtained. The preservative suppliers could be expected to deal with this basic requirement of CCA treatment plant operation.

Other aspects of treatment plant compliance, in addition to the handling of CCA-treated timber stock, are detailed in the check list to be found in Appendix C of Part 2 of the standard. This Appendix covers the operator requirements, plant and equipment, design and layout, occupational safety, chemicals handling and storage, first aid, and environmental aspects such as site monitoring and spills management.

Finally, treatment plants need to hold and provide documentation, when requested, to show that they are operating in compliance with the standard.

It is intended that the use of CCA as an RCP will be monitored by an appropriate state government department, e.g. a state EPA body. At the time of writing not all states have subscribed to this RCP process and prepared their enabling legislation.



Summary of CCA as an RCP

- The APVMA no longer allows CCA to be used for the treatment of timber intended for use as garden furniture, picnic tables, exterior seating, children's play equipment, patio and domestic decking boards, and handrails.
- CCA may be used to treat all other timber products, but they must be marked with the words "Treated with Copper Chrome Arsenate"
- CCA has been declared a Restricted Chemical Product (RCP)
- State governments must introduce enabling legislation for CCA to be used as an RCP and they must monitor its use and application at the treatment plant

- CCA as an RCP can only be supplied and used by authorised persons who have received accredited training in the use of CCA and in the operation of preservative treatment plants
- Preservative treatment plants must largely comply with AS/NZS 2843-2006

Further information.

- <http://www.agriculture.gov.au/index.cfm>
- http://www.apvma.gov.au/users/restricted_chemicals.shtml
- <http://www.fafpesc.com.au>
- <http://www.tpaa.com.au>
- AS/NZS 2843 Part 1 & 2 – 2006. *Timber Preservation Plants*. Standards Australia.

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