

## **UPDATE ON RE-EVALUATION OF CCA, CREOSOTE & PCP**

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### **Introduction**

The Pest Management Regulatory Agency (PMRA) has a mandate to prevent unacceptable risks to people and the environment from pesticides use, to minimize risks currently posed by pesticides, and to ensure pesticides are of acceptable value. As part of this mandate, the re-evaluation program at PMRA is responsible for determining if the uses of “old” pesticides are still acceptable. There are approximately four hundred active ingredients in Canada that were registered prior to 1995, and which are subject to re-evaluation. This includes the heavy duty wood preservatives chromated copper arsenate (CCA), pentachlorophenol (PCP), and creosote. The re-evaluation process is typically based on single active ingredients; however CCA, which consists of three actives (copper, arsenic and chromium), was an exception. The Pest Control Products Act (PCPA) requires a re-evaluation of active ingredients to be initiated every 15 years.

### **Background/Highlights**

The re-evaluation of CCA, PCP and creosote is being conducted cooperatively with United States Environmental Protection Agency (EPA). The science evaluation is being done jointly by PMRA and the EPA, while the EPA will publish the primary documentation. The re-evaluation of the heavy-duty wood preservatives began in July 1992 with a data call in from Agriculture Canada. In April 1995 the PMRA was formed under Health Canada and took over the re-evaluation of CCA, PCP and creosote.

In April 2002, the registrants of CCA voluntarily withdrew the residential uses of CCA-treated wood. A draft report on the probabilistic exposure and risk assessment for children came out in November of the following year, with the final report in April 2008. The preliminary occupational and environmental risk assessment was published in March 2004. In May 2005, a fact sheet was published on the permitted uses of CCA-treated wood, which was followed up a year later by the publication of a CCA label guidance document, collaborated on with the EPA and the wood preservative industry. In April 2008, a revised risk assessment was published for public consultation.

In December 2003, a preliminary risk assessment for creosote was released for public comment. A preliminary health and environmental risk assessment was carried out for PCP in December

2004, and for significant contaminants of PCP (i.e. hexachlorobenzene, dioxin & furans) in April 2005. The revised risk assessments were published for public consultation in April 2008.

Risk estimates in the revised assessments were derived from data pre-dating the implementation of the, “Recommendations for the design and operation of wood preservation facilities, 2004. Technical Recommendation Documents” (TRD’s) by industry, and certain default assumptions may have lead to an overestimation of risk. The final risk assessments for CCA, PCP and creosote had the following major findings: there were exposures of concern for certain job descriptions; there were potential occupational cancer risks; and there were potential occupational risks not related to cancer. In September 2008 the EPA-RED’s were signed for CCA, PCP and creosote, and all three were found to be eligible for re-registration subject to the implementation of label changes and mitigation measures.

### **Next Steps**

The EPA Re-registration Eligibility Decisions for CCA, PCP and creosote are to be published for comment in November 2008. These RED documents will outline the potential risks of concern and mitigation strategies, will require updated labels with mitigation measures by March 2009, and will require that the necessary engineering controls are in place by December 31, 2013. The PMRA has targeted publication of its Proposed Re-evaluation Decision Document (PRVD) by the end of 2008. It is anticipated that the PRVD will reference the final US-EPA RED risk assessments. The PRVD will address Canadian-specific elements, such as the evaluation under the Toxic Substances Management Plan (TSMP), the assessment of brush-on creosote, and the addition of target retention rates to labels. Furthermore, Canadian specific mitigation and risk management measures will be taken into account.

The PMRA views the TRD’s as a successful & pragmatic approach to risk reduction, which may already take into account many of the mitigation controls being considered by the EPA. Therefore, the PMRA is considering ways to best utilize the TRD’s as a risk mitigation and risk management tool. Environment Canada (EC) is responsible for relevant compliance action pertaining to the TRD’s under the Canadian Environmental Protection Act (CEPA) and this remains an EC priority. Additional mitigation measures are being considered and will be presented in the consultation document (PRVD). PMRA encourages stakeholder input on the proposed re-evaluation decision during the consultation period.