

ENVIRONMENTAL ISSUES UPDATE
CANADIAN WOOD PRESERVATION ASSOCIATION ANNUAL MEETING

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MONTREAL, QC

HENRY WALTHERT, CAE

EXECUTIVE DIRECTOR

WOOD PRESERVATION CANADA

The long process of TRD (Technical Recommendations Documents) implementation which began with the publishing of the first edition of the Environment Canada TRDs in April 1988 reached its pinnacle with the final SOP (Strategic Options Process) audits in 2005-06.

In 2006, Wood Preservation Canada with the acknowledgement and support of Environment Canada introduced the Canadian Wood Preservation Certification Authority program as a means to maintain the level of TRD compliance attained by the Canadian wood preservation industry.

Currently 52 of 56 treating plants operating in Canada have been certified under the CWPCA program. Certified plants score a minimum of 95% compliance for 220 criteria within the current 2004 edition of the TRD. \

The program requires each plant to qualify an internal staff auditor through a CWPCA training program. An internal audit is conducted annually and submitted to the CWPCA auditor, Water and Earth Science Associates Ltd. (WESA) for review. Deficiencies must be addressed within 60 days. In addition, an external audit is conducted by WESA every three years. Again deficiencies must be addressed within 60 days. CWPCA has now completed two years of external audits and 2010 will be the last year of the cycle.

Environment Canada has now been reengaged after an absence of 2 years. The industry has in fact been a victim of our own success. The success of the TRD implementation and CWPCA program has resulted in the desired effect of keeping government out of our business. The downside is that some of the work needs to be ongoing. The file has been relocated to Ottawa, ON from Edmonton, AB. Three priorities have been identified: 1. Maintenance of TRDs; 2. Complete Pollution Prevention (P2) requirements; 3. Complete work of the Steering Committee.

On another front, the Reevaluation of Heavy Duty Wood Preservatives initiated in 1992 is now nearing completion. The Pest Management Regulatory Agency will be meeting with the preservative suppliers in December (creosote, penta, CCA, ACZA) to discuss the results and potential outcome of the reevaluation. Wood Preservation Canada has been working closely with the suppliers and PMRA to ensure minimal impact on our industry.

Two items that have been proposed for the preservative labels (listed above) is a requirement for TRD compliance at each plant and the inclusion of target retentions.

WPC has encouraged the PMRA to consider the TRDs rather than other label requirements as was suggested by the U.S. Environmental Protection Agency (EPA) in their decision documents. To accept this type of reference is a break with traditional practice at PMRA.

The inclusion of target retentions is simply a generic means to reference the CSA standards for treated wood products. The intent is to avoid any overtreatment of products.

PMRA will be issuing a public review document in early 2010. The final document will then be published and label changes should be completed by year end.

The media frenzy experienced by our industry in the early 2000's has almost disappeared entirely. The phase out of CCA took us from hundreds of stories per year to a handful. Most of the media reports we see today are usually written in newspapers or magazines and focus on play structures and waterfront applications of treated wood. PMRA reports a similar experience with little or no media contact.

There is however, still a misunderstanding of wood preservatives at local levels especially in municipalities where pesticide bans have become common place. Misinformation and lack of knowledge on treated wood products often bring their use into question for municipal projects like boardwalks and parks.

Some other authorities such as Fisheries & Oceans Canada, Parks Canada, etc. are also hesitant to use pressure treated wood in some applications despite the evidence showing that they are quite acceptable. More often than not these concerns are related to aquatic applications.

Finally, many people have asked the question “what is next for the treated wood industry”.

From my perspective, I believe that we need to be aware of the fact that we are still part of the bigger pesticide issue at least for now. The various components of wood preservatives will continue to be scrutinized by PMRA, Health Canada, Environment Canada, users of treated wood and environmental groups. A shift to wood modification processes may provide us with better public perception and perhaps ease the concerns of regulators but they will also introduce new challenges primarily cost competitiveness.

Canadian treaters can take great pride in the accomplishments of our industry over the last nine years. Our image in the marketplace and at the regulatory level is very positive. By being proactive and embracing change we have attained success where many other industries have failed. We must continue to be innovative and lead rather than be led.

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