SOP
PAST. PRESENT. FUTURE?

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PAST

To understand what the Strategic Options Process for the Management of CEPA Toxic Substances from the Wood Preservation Sector is all about, one has to first examine the background that led to this initiative.

The Canadian Environmental Protection Act, assented to in June 1988, requires the Minister of the Environment and the Minister of Health to prepare and publish a Priority Substances List (PSL) that identifies substances that may be harmful to the Canadian environment or human health.

The first PSL was published in 1989 and identified 44 substances for priority assessment. Assessment of these substances was completed and reports prepared in 1994, with 25 of the substances declared toxic as defined by CEPA. The following substances used by the wood preservation industry were found to be toxic: inorganic arsenic, chromium VI, polycyclic aromatic hydrocarbons (PAH), creosote-impregnated wastes, polychlorinated dibenzodioxins (i.e. PCDD's), polychlorinated dibenzofurans (i.e. PCDF's) and hexchlorobenzene (HCB).

Under the Act, the Ministers are responsible to establish and apply controls for CEPA toxic substances to prevent harm to humans and the environment. The Strategic Options Process was introduced as a means by which the Ministers could establish and apply these controls.

The process allows a multi-stakeholder committee or Issue Table to develop recommendations for the management of CEPA toxic substances in specific applications by industrial sector or by substance. The Issue Table is composed of representatives from industry, user groups, non-government organizations (environmental groups), and federal/provincial/ municipal governments.

The SOP consists of two phases: information gathering and options identification. The first phase involves collection of technical and socio-economic background information. The second phase involves using the collected information to make recommendations (with goals, targets and schedules) for the management of CEPA toxic substance releases to the environment.

The management of CEPA toxic substances is also guided by the Toxic Substance Management Policy (TSMP) adopted by the federal government in June 1995. The TSMP presents two different management approaches based on science and risk. The

goal for Track 1 substances, those that are CEPA toxic or equivalent, predominantly anthropogenic, bioaccumulative, and persistent, is virtual elimination from the environment. The goal for Track 2 substances, those that do not meet all the criteria of Track 1, is life cycle management to prevent or minimize release into the environment.

In the wood preservation sector, three substances were identified as Track 1: PCDD's, PCDF's and HCB. These substances are micro-contaminants of many pesticides including pentachlorophenol. Inorganic arsenic and chromium VI, components of CCA and ACA were designated Track 2. PAH and creosote impregnated waste, related to the wood preservative creosote, were also designated Track 2.

The Wood Preservation Issue Table first met in December 1994 at which time the first working group was established. A Socioeconomic Working Group was charged with developing an updated report based upon the Value Assessment of the Canadian Pressure Treated Wood Industry published by the Canadian Forest Service, Department of Natural Resources Canada in April 1994.

For the January 1995 meeting, the Canadian Institute of Treated Wood requested that the federal departments identify the relationship of the SOP with the previously announced (1992) Reevaluation of Heavy Duty Wood Preservatives by Agriculture Canada (now Pest Management Regulatory Agency, Health Canada [PMRA]). CITW wished to avoid a duplication of effort by having clearly defined objectives for each process including an indication as to how they would or would not interact. Environment Canada and Agriculture Canada were unable to provide this outline. CITW requested that no additional meetings of the Issue Table be scheduled until the departments were able to provide an appropriate framework in which to proceed.

Between January 1995 and June 1997, the federal departments involved resolved jurisdictional questions and prepared Scoping Documents outlining the process to be followed.

In June 1997, the Issue Table met again and a working group for each preservative type was established; CCA/ACA, creosote and pentachlorophenol to gather release data throughout the life cycle of each product. The working groups met in September 1997, November 1997 and December 1997 to review data. The Issue Table also met in December 1997 to set priority areas. The working groups met again in February 1998 to finalize data and in April 1998 to identify recommendation principles.

A Control Status Working Group was formed in June 1997 to provide a report to the Issue Table on current regulations and practices. A contractor was engaged to survey the industry, consult with regulators and review literature. The group met in November 1997 to review the draft questionnaire, in January 1998 to review preliminary results and finally in May 1998 to finalize the report.

In June 1998, the Issue Table came together again to evaluate the recommendation concepts and options as presented by the working groups. The three preservative working groups were dissolved and two new groups related to life cycle were established. The first group was formed to develop recommendations for preservative manufacturers and treaters, the second group would address the in-service and disposal issues of the users. These new working groups were charged with providing draft recommendations to the Issue Table for their respective areas of activity.

Socio-economic factors were applied to the draft recommendations reviewed by the Issue Table at their next meeting in October 1998. Work had progressed to the point where a Writing Group was established to produce the first draft Strategic Options Report (SOR).

PRESENT

Today we await the first draft Strategic Options Report.

We can predict with some certainty some of the recommendations which will arise for the manufacturing / treating sector, the residential market sector and the industrial / commercial sector.

Recommendations for the manufacturing / treating sector can be summarized in ten main points:

1. A steering committee composed of representatives from industry, government, environmental groups and other key stakeholders will oversee the implementation of the recommendations.

2. The TRDs be recognized as a comprehensive approach to managing all releases and wastes from wood treatment facilities. All provinces should implement the objectives of the TRDs equally.

3. All facilities (treatment and chemical manufacturers) report their emissions of CEPA toxic substances to NPRI beginning in 2001.

4. The preservative manufacturers continue existing efforts to reduce emissions of CEPA toxic substances from their Canadian facilities consistent with existing regulations and reporting requirements and the use of environmental management systems.

5. All existing wood preservation plants will meet the objectives of the Technical Recommendations Documents through a voluntary continuous improvement program. As a condition of the voluntary program the treaters will participate in an assessment program and submit and TRD Implementation Plan. The program will continue on a five year cycle.

6. Outreach programs to inform and assist treaters in meeting the objectives of the TRDs, preparing the implementation plan and reporting to NPRI will be made available in the year 2000. These programs will be delivered jointly by industry and Environment Canada.

7. The steering committee will review and measure the success of the voluntary program as described. The steering committee will be required to make a decision whether to continue with the program on a voluntary basis or to move to a mandatory program.

8. The steering committee will evaluate the effectiveness of the TRDs in reducing CEPA toxic substance releases at the end of the first 5 year cycle.

9. All new and / or expanding wood preservative manufacturing plants meet an equivalent level of performance to existing plants through an effective environmental management system.

10. All newly constructed wood preservation plants or plant additions will meet all objectives of the TRDs on start up.

Recommendations for the residential market include:

1. All treatment facilities will provide distributors of consumer pressure treated wood products with Consumer Information Sheets for distribution with subsequent sale of these products.

2. Distributors (retail, wholesale) of consumer pressure treated wood products will be informed through an outreach/education program, delivered jointly by CITW and Environment Canada, about the consumer information sheets, purchasing, storage/handling and disposal of these products.

3. The Consumer Information Sheets are to be updated to include pertinent best management practice information such as CSA standards, BMPs, etc.

4. A strategy / process is to be developed for dealing with the volume of consumer lumber that may arise in the future.

The recommendations for industrial/commercial in-service use and post-use treated wood are:

1. A steering committee made up of representatives from industry, government, non-governmental environmental groups and other key stakeholders will oversee the implementation of these recommendations.

2. The steering committee will undertake to development guidance documents, identify and fill data gaps, facilitate the development of technical guidance, develop and deliver an outreach program, review and evaluate the program, and publish a report in 2006 summarizing progress.

3. Individual industrial user companies undertake the development and implementation of an environmental management system for treated wood products which includes public reporting.

4. The steering committee will facilitate the exchange of information and the building of partnerships for lifecycle assessment and analysis of alternative materials and wood preservative chemicals.

5. The steering committee will facilitate the development of an Industrial Treated Wood Waste Management Strategy and make recommendations regarding its implementation.

FUTURE

Environment Canada and Health Canada are concerned about the various constituents of the preservatives that we use. Treated wood products are found everywhere in our community especially since the development of the residential treated wood market. Our federal government views the potential for exposure to the environment and humans as significant. As a result, the federal departments responsible for protecting the environment and human health have targeted our industry for measures to reduce release of these substances.

The outcome of the SOP should not be taken lightly. The way we do business is going to change. We are going to have to be more responsible for the way our plants operate, the way our products are made and how they are used.

Compliance with the TRDs alone will involve a significant investment by our industry.

Carroll-Hatch (International) Ltd. in their report to the Issue Table entitled "Socioeconomic Analysis of Environmental Management and Waste Disposal Options for the Canadian Wood Preservation Industry" estimated that the cost of upgrading our plants to the new 1999 TRD will be $93 million.

The plant assessments have are estimated at $2750 per cylinder and each plant will also incur the cost of implementation plan preparation and reporting. Additional expense will result from the requirement to produce and distribute consumer information sheets.

The users of treated wood products will be affected by the recommendations. The emphasis is on greater accountability for where and how the products are used and ultimately how they are reused or disposed of.

The wood preservation industry in Canada is responding to the needs of Canadians by continuing to provide environmentally, economically and socially beneficial products.

UPDATE TO PAPER
MARCH 26, 1999

The Strategic Options Process for the Management of CEPA Toxic Substances from the Wood Preservation Sector the Strategic Options Process for the Management of CEPA Toxic Substances from the Wood Preservation Sector reached a tentative conclusion on March 5, 1999. The Issue Table met in Vancouver, BC to review and discuss the draft Strategic Options Report. After 3 days of work, the group was able to reach agreements on the basic recommendations and the format of the report.

The Issue Table and the various working groups held a total of 25 meetings and 33 conference calls. In addition, CITW and various industry representatives met face-to-face or through conference calls on several occasions to develop positions and review documents.

Countless hours of hard work and dedication by members of the Issue Table, industry representatives and government officials has resulted in a workable program which will maintain the long term viability of the wood preservation industry.