# Note to CAPCO

C94-02

### Re-Evaluation Of Heavy Duty Wood Preservatives Status Report

The purpose of this document is to provide an update on the progress that has been made since the re-evaluation of heavy duty wood preservatives was announced on July 2, 1992 (A92-02, Re-evaluation of Heavy Duty Wood Preservatives).

The re-evaluation process is part of the Canadian pesticide regulatory program and is designed to reassess the safety, merit and value of pesticides registered in Canada.

The re-evaluation of heavy duty wood preservatives affects 9 active ingredients.\* There are currently 30 products registered for use in heavy duty wood preservation in Canada. These products are applied at approximately 60 treatment facilities. The resulting treated wood products are used as railway ties telephone/utility poles, landscape lumber and playground structures, marine and fresh water pilings and general wood construction materials.

This document is published under the authority of the Interdepartmental Executive Committee on Pest Management which represents the departments of Agriculture and Agri-Food, Health, Environment, and Natural Resources.

\* arsenic pentoxide, disodium octaborate tetrahydrate, cupric oxide, chromic acid, creosote (including coal tars), pentachlorophenol and related chlorophenols, elemental copper (present as copper naphthenate), copper 8 quinolinolate and elemental zinc (present as zinc naphthenate)

#### (publié aussi en français)

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Publications Coordinator Pest Management Regulatory Agency Health Canada 2250 Riverside Drive A.L. 6606D1 Ottawa, Ontario K1A 0K9 Government of Canada Gouvernement du Canada Telephone: (613) 736-3592 Facsimile: (613) 736-3798 Information Service: 1-800-267-6315 (In Canada only) Internet: pmra\_publications@hc-sc.gc.ca www.hc-sc.gc.ca



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#### **Current Status**

Registrants (manufacturers) of the active ingredients have responded to the re-evaluation announcement indicating they would provide existing data/information to conduct a preliminary assessment of potential health and environmental risk. In January 1993, registrants of the affected active ingredients provided certain data to reviewing agencies to begin the assessment process. Currently, the re-evaluation of the heavy duty wood preservatives is in its preliminary stages.

### **Coordination with United States Environmental Protection Agency (EPA)**

As part of Canadian US Trade Agreement (CUSTA), discussions were held with EPA pesticide regulatory officials in the fall of 1993. An agreement was reached to formally explore the possibility of coordinating the Canadian re-evaluation and US EPA reregistration of active ingredients currently registered as heavy duty wood preservatives.

This agreement offers benefits to both countries by affording the opportunity for Canada and the U.S. to consider the possibility of a harmonized approach to the re-evaluation / reregistration of heavy duty wood preservatives. This agreement increases the likelihood of participation from basic manufacturers, who operate in the same international, regulated markets and who are likely to make business decisions based on market size and economic considerations. Preliminary discussions between Canada and USA will take place in the first quarter of 1994.

### Effect of Re-Evaluation on New Product Registrations

As explained earlier in this document, re-evaluation is an activity to reassess the registrations of pesticides currently in use. The registration process for new or alternative products operates independently from the re-evaluations of the existing active ingredients. Products which meet current registration requirements will be considered for registration as wood preservatives.

#### **Assessment of Merit**

Natural Resources Canada and Agriculture and Agri-Food Canada will do an assessment of the merit and value of these products as part of the re-evaluation process. Studies are currently underway to address these aspects of the reassessment.

An assessment of merit will entail an examination of product performance to determine if rates of use (as specified on product labels) need adjustment. The assessment of value could include an analysis of the benefits to Canadians associated with the use of this group of wood preservatives and the treated wood. In addition, the value assessment may consider the potential benefits of alternative products not yet registered. Also relevant to the consideration of value may be an examination of alternative methods of controlling/preventing decay organisms and consideration of alternative building materials such as metal or concrete.

#### **Next Steps**

The Departments of Health Canada and Environment Canada are expected to provide registrants with their observations based on the preliminary scan of data submitted. These observations may identify additional available studies that could be submitted as part of the database for an active ingredient. (Note: It has not yet been determined what data will be required to complete an assessment of safety, merit and value.)

Further discussions will be arranged with the US EPA to identify potential areas of cooperation in the reregistration/re-evaluation of the 9 active ingredients currently registered for heavy duty wood preservation. We hope to establish joint objectives that will result in coordination of re-evaluation activities in both countries.

Please direct any inquiries regarding this document to:

Information Service Pest Management Regulatory Agency Health Canada 2250 Riverside Drive A.L. 6606D1 Ottawa, Ontario K1A OK9