Productivity Commission
LB2 Collins Street East
Melbourne
VIC 8003.

Dear Sir/Madam

Re: Waste Generation & Resource Efficiency Inquiry

I would like to draw the Commission's attention to problems associated with the disposal of CCA-treated timber. In New South Wales, the Department of Environment and Conservation has classified CCA-treated timber as a 'lower priority waste of concern' (EPR Expert Reference Group 2005).

CCA-treated timber retains some of its toxic components, copper, chrome, arsenate during its service life and beyond. However, these toxins are known to leach from treated timber (APVMA 2005). This leaching continues whilst in service and when finally disposed of in landfills. Recent research undertaken in the United States suggests that without the benefit of appropriately lined landfills, and without reduction in quantities of treated timber being disposed to landfills, the leachate will eventually contaminate surrounding soil and possibly groundwater (Khan, Jambeck et al. 2006).

There are no alternative safe disposal options yet available for CCA-treated timber (Lansbury Hall and Beder 2005). Incineration generates toxic smoke and ash. Re-use options are limited, due to the toxic nature of the timber. The timber can not be recycled for the same reasons. Whilst CCA-preservatives continue to be used to extend the service life of timber, and until alternative safe disposal options are developed, CCA-treated timber will eventually end up in landfills.

However what is of major concern, from a waste management perspective, are recent recommendations to paint or stain *in situ* CCA-treated structures in order to help reduce potentially harmful leachate levels (APVMA 2005; Cookson 2005; U.S. EPA 2005). When painted or stained it is not possible to distinguish CCA-treated timber from non-treated wood (EPR).

Without the availability of clear identification it remains necessary to handle all timber as if it were treated with CCA preservative. Thus treated timber contaminates stock piles of non-treated wood. Non-treated wood then becomes a wasted resource that otherwise should and could have been re-used or recycled.

If the Commission is serious in its undertaking 'to examine ways in which, and make recommendations on how, resource efficiencies can be optimised to improve economic, environmental and social outcomes' then an assessment of CCA preservatives and CCA-treated timber should be conducted. The assessment would identify the contribution that CCA preservatives and timber treated with CCA make towards:

- increasing waste for which no safe disposal options exist;
- the prevention of resource recovery;
- the encouragement of resource inefficiency.

Any recommendations for managing the safe disposal, resource recovery and resource efficiency of an expanding CCA-treated timber problem will be welcomed as beneficial to public and environmental health.

Yours sincerely

Mary Scott

List of References

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