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CCA-Treated Pine Update- Some Implications for Playgrounds

DHS and APVMA ruling

The Department of Human Services, Vic ruled in January 2004 that: "no new structures should be built of CCA treated timber." See DHS website[1]. The ruling has not concluded that CCA treated timber is unsafe, rather that there is insufficient evidence that it *is* safe). It follows a review by the Australian Pesticides and Veterinary Medicines Authority (APVMA)[2] of this treatment method for timber. This APVMA review concluded that CCA should not be used to treat products where there is likely to be "intimate and frequent contact", including new playground structures and picnic tables.

Dr Harry Greaves, a consulting scientist who has spent much of his working life investigating this material (and who spoke at a recent Jeavons & Jeavons seminar) has studied the APVMA report. In an article circulated by the Playgrounds and Recreation Association of Vic (PRAV) recently[3] he concluded that:

- the recommendations of the APVMA do not stand up to scientific scrutiny,
- APVMA has been unduly influenced by a minority of submissions (only 5 in number which supported a ban), and
- the reviewers have not completely adhered to their own guidelines which require them to use scientific principles in their assessments,

For the Environment?

Debates about the environment are always complex, however just three environmental impacts of such a ban are:

- An increase in the demand for timbers which may be unsustainably harvested.
- The energy required to manufacture common alternatives to timber (steel, aluminium and recycled plastics) is considerably greater than the energy required to produce timber.
- In the removal of existing structures some of this timber will ill-advisedly be burnt. Burning is one of the few known hazards associated with treated pine and *must* be avoided.

Our Position

We are keen to establish the facts. If there is any evidence proving any risk to children or adults we would support a ban. However it is irresponsible to ban an extremely useful product without transparent and substantiated conclusions.

The problem is….

It is difficult to find other practical, affordable and easily obtainable alternatives to CCA treated redried treated pine. Alternative types of timber treatment are not available in sufficient quantities and material sizes from treatment plants in Victoria. Timber suppliers have indicated that: ACQ is likely to cost 10% more than CCA, and although L.O.S.P may be another alternative, its availability and suitability are questionable. We prefer not to use timber from unsustainable logging practices. We have ceased to use white Cyprus pine and many durable local hardwoods for this reason. We welcome any information on alternative, sustainable, durable timber which is readily available in a good range of sizes. Coating with a penetrative oil or a film-forming finish is apparently acceptable as a sealant (but these need to be maintained during the life of the structure). We would welcome any factual information on this matter.

Why we use timber in many of our playgrounds

Timber is a friendly, attractive material with endless potential for custom design in playgrounds. It works well in combination with other natural and man made materials, each of which is suited to specific purposes. Our own research also suggests children (especially in schools) mostly prefer timber play structures.
Long term observations suggest that the life expectancy of durable timbers is not substantially less than many steel products used in playgrounds. Many 'standard' products on the market have limited flexibility, especially in designing for children with disabilities. Variety in play and materials is important and we prefer to use a wide choice in our work.

Where to from here…

- The 'bans' proposed are not retrospective and existing treated pine will not need to be removed
- New Zealand authorities did *not* support a ban of this material following their own review.
- Public comment on the APVMA review closed in February 2004. We expect a final report by mid year.

We welcome any feedback or further information which can progress this debate further. Please email Mary Jeavons, Director Mary Jeavons Landscape Architects at: mrobey@netvigator.com

[1] *http://hnb.dhs.vic.gov.au/commcare/yafs_yf.nsf/2fc3379bd0005bd64a2566cf00283d52/ee4db027acc947f6ca256e3c000cb8a6/$FILE/CCA_InfoSheet_Jan2004.pdf*
[2] *http://www.apvma.gov.au/chemrev/arsenic.shtml*
[3] (*An Appraisal of the APVMA review of Arsenic Treated Timber Products, by Dr Harry Greaves, Jan 2004*)

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