



OEFFA Organic Certification Fact Sheet

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Treated Lumber and Wood

Treated lumber is not allowed for new construction or replacement/repair on certified organic farms. It contains prohibited synthetic substances that may contaminate soil, livestock, or organic products. Using treated wood products for construction on your operation will result in a noncompliance and measures must be taken to mitigate the risk of contamination. Alternatives are available, but may require additional effort to source and use.

Definition & NOP Citation

Treated lumber is any wood product used for construction or other purposes on the farm that has been treated with any prohibited substance, including but not limited to those containing arsenic. NOP § 205.206(f) states that a producer must not use lumber treated with arsenate or other prohibited materials for new installations or replacement purposes in contact with soil or livestock.

Common Inquiries from Organic Producers

Here at the OEFFA Certification office, we receive questions about treated lumber nearly every day. Fortunately, the NOP Rule for treated lumber is quite clear. If you are an organic producer with pre-existing buildings or fencing constructed of treated lumber, these structures will be 'grandfathered in' and will not need to be removed. However, all new construction or repair must use untreated lumber.

You may not use recycled telephone poles or treated lumber, even if the lumber is 20 years old, to make a repair on an aging fence or building, even if that fence or building was 'grandfathered in.' No treated lumber is allowed for replacement purposes. Reusing treated lumber from a structure that was torn down, even if that structure was 'grandfathered' in, is also prohibited.



Why is treated lumber prohibited?

There are three main types of pressure treated lumber; CCA, ACQ, and CA-B. CCA wood contains chromate copper arsenate. The EPA ruled in 2003 that this type of treated wood is not permitted for residential construction. ACQ (alkaline copper quat) and CA-B (copper azole) are the two commonly available products that were developed as replacements for CCA lumber. CCA was banned by the EPA when the arsenic was found to leach out of the wood and contaminate surrounding soil and water systems. Neither ACQ nor CA-B lumber contain arsenic, but they do both contain copper, which acts as a fungicide, as well as an additional insecticide. Although copper is not nearly as toxic as arsenic, it has been found to leach out of treated lumber. New treated lumber products regularly come on the market, but to date OEFFA has not reviewed any treated lumber product that would be acceptable for use on organic farms.



The organic standards are intended to provide consumers a product that is as free from synthetic chemical contamination as is possible. It is understandable that the standards would prohibit a product which acts as a slow release mechanism for synthetic insecticides, fungicides, and bactericides even if the synthetic chemicals are not currently recognized as posing a risk to human or animal health.

The highest potential for soil contamination from treated wood products is in the first year that the product is exposed to rain and other environmental effects. This fact may have played a role in the decision that the NOP made that allows pre-existing treated wood applications to be grandfathered in the organic certification process.

Other Considerations

Special considerations for structures like greenhouses or barns are sometimes warranted and will be addressed by OEFFA staff on a case-by-case basis. If there is no chance of soil, livestock, or organic product contact, allowances may be made for the use of treated lumber, with provisions. For instance, if your permanent greenhouse is at least 25 feet from organic fields, and you aren't planting in the ground in the greenhouse, treated lumber may be permitted.

Coatings or physical barriers that prevent direct and indirect contact of treated wood with certified land, animals, and products may also be approved, on a case-by-case basis, if there is sufficient evidence that the coating or barrier will prevent contact over the life of the structure, not contribute to the contamination of any certified entity with prohibited substances, and not contribute to contamination of crops, soil, or water.

In all cases, call or write the OEFFA Office if you aren't sure.

Alternatives to Treated Wood

There are no untreated wood products that will last as long as a treated lumber. However, there are wood species that are both durable and long-lasting. Unfortunately, they are often expensive and sometimes difficult to source. Some of the longest lasting wood products available are redwood, cedar, and cypress. Other naturally decay resistant species include black locust, catalpa, juniper, burr oak, chestnut oak, post oak, and white oak. When purchasing any of these naturally decay resistant wood products, it is best to use heartwood. The sapwood of these tree species is not considered decay resistant.



New alternative lumber products on the market made of recycled plastic and wood pulp may perform well, but they have not been on the market long enough to judge their longevity in practical applications. Some offer a 25 year warranty for outdoor residential applications.

Raw linseed oil can be used to protect a natural wood product from decay. It is important to recognize that raw linseed oil differs from boiled linseed oil. Boiled linseed oil is a mixture of raw



linseed oil and synthetic solvents that may not be permitted for use in organic systems. Raw linseed oil is an inexpensive wood preservative however it is not as effective as creosote or other synthetic wood preservatives. Linseed oil is an extract of flax seed. It is a food source for mildew, and mildew will grow on wood treated with linseed oil. Linseed oil can spontaneously combust so use caution when working with it.

Dealing with Unintentional Use

Use of treated wood or lumber on your certified organic farm will result in a Notice of Noncompliance being issued to your operation. This noncompliance must be resolved before the certification process can continue.

Possible resolutions include establishing a 'buffer zone' around the treated lumber—as with any prohibited substance. If you put in a new fence of treated lumber, expect to create a buffer zone inside the fence. Adequate buffers will be determined based on the nature of the operation, potential for contamination, and on-site evaluation by the inspector. The crop within that buffer zone may be harvested and sold as a conventional crop. If the fence is for livestock pasture, you will need a buffer zone from the treated wood fence to your organic pasture and a second fence or barrier to keep livestock from grazing up to or contacting the fence.

Intentional use of treated wood or lumber on a certified organic farm may result in suspension or revocation of your certification.

Resources

When considering building or repairing a structure on your operation, contact local suppliers of building products to see what is available.

With a list of products that are available to you, you may want to contact the OEFFA Certification office to confirm that your plans for the items you wish to use are compliant with NOP rules.

If you have difficulty sourcing compliant materials in your area, the OEFFA Education office may have contacts for suppliers in your area that sell compliant products. They can be reached at (614) 421-2022.