

March 2007

## ETNO Common Position on the reuse of CCA and creosote impregnated telephone poles

### Executive Summary

Before 2002 old wooden poles treated with Creosote or Chromated Copper Arsenate (CCA), which represent about 85% of the total, could be re-sold for outdoor applications like bridges and fences. After Directives 2001/90/EC and 2003/2/EC (specifying waste from creosote and CCA treated wood shall be treated as hazardous) came into force, considerably different interpretations on the possible reuse of poles were adopted across EU member states. The resulting high disposal costs of telephone poles and differences in interpretation of legislation create unfair competitive conditions for telecom operators. ETNO therefore asks for harmonisation and proposes allowing the reuse and thus re-sale of all used poles, including creosote and CCA poles, which would reduce the overall amount of waste and the associated environmental burden. This would mean savings in disposal costs, reduced use of natural resources (trees) and less waste as well as CO<sub>2</sub> emission.

ETNO (European Telecommunications Network Operators' Association) is the principal policy group for European electronic communications network operators. The Association welcomes the EU Directives aiming to reduce waste in general and the impact of hazardous waste in particular.

Creosote (see Directive 2001/90/EC) and CCA (Chromated Copper Arsenate, see Directive 2003/2/EC) were defined as hazardous and restrictions on the use and reuse of CCA and creosote impregnated telephone poles were introduced. Before 2002, the reuse of telephone poles as bridges and fences was a common practice, which created a great demand for used telephone poles. This was a win-win situation between different stakeholders – the telecom operators saved on disposal costs, the re-users had access to affordable material, considerable amounts of natural resources could be saved and CO<sub>2</sub> emissions reduced.

In 2005, an ETNO task force on “Poles” carried out a survey concerning the disposal costs and interpretation of legislation on re-use of the telephone

poles among the major European telecom operators. These operators have more than 35 million telephone poles – 45 % creosote, 39 % CCA and the rest of the poles, either CC (treated with Ammoniacal Copper Citrate) or made of concrete, steel or fibre glass. 0.8 Million new telephone poles are being purchased annually. The disposal costs may vary € 17-90 per pole or € 50-400 per tonne across Europe and they mainly concern CCA poles because they can not be incinerated as easily as creosote poles due to the chemical residues in the poles. The costs generated come mainly from incineration and transportation, especially when transport between countries was necessary.

At the regulatory level, the interpretation of the EU Directive for reuse is not uniform, which has resulted in different disposal practices among telecom operators. Incineration seems to be the most common practice. However, some Member States still allow the reutilisation of CCA and creosote treated poles for other purposes, such as re-selling them for further use / recycling. That is why the reuse of telephone poles for fencing and other purposes is still very common. Similar reuse interpretation problems are encountered by the electricity utilities and railway companies.

The high disposal costs of telephone poles and differences in interpretation of the directive create unfair competitive conditions for telecom operators. This can also lead to unnecessary transportation of poles between different countries for disposal, increasing unnecessary CO<sub>2</sub> emissions.

ETNO fully supports Commission Communication COM (2003) 301 which encourages the prevention of waste and proposal COM (2002) 512 which strives to minimise waste to landfills. It is the unanimous opinion of ETNO members that an interpretation of legislation, which would entail the mandatory disposal of serviceable treated wood as hazardous waste, while at the same time allowing the use of newly treated wood for the same purpose, does make little economic or environmental sense. Such classification and disposal is in conflict with sustainable development principles.

The reuse of telephone poles should be the preferred option until final disposal. Therefore ETNO members consider the sale of poles for reuse other than as poles as acceptable when the following conditions are complied with:

- All furniture / appliances is removed
- All rotten wood is removed and disposed of as hazardous waste
- A safety data sheet is issued to the purchaser. Information to include:
  - Restrictions on use
  - Final disposal conditions
  - Use of adequate individual protection equipment, in case of handling or mechanised processing.

Following the removal of furniture and unserviceable wood, ETNO considers that the remaining pole is fit for reuse for e.g. agricultural purposes such as fencing, which is a permitted use for creosote, but not for CCA treated wood.

ETNO finds that the environmental authorities should harmonise the interpretation of rules for reuse of poles accordingly within the EU.

The benefits of such harmonisation include:

- Reduction of total waste generated
- Reduction of total CCA and Creosote material used
- Reduction of environmental burden caused by logging, transport
- Reduction of environmental burden caused by hazardous waste treatment, disposal and incineration
- Support of the hierarchy of preferred waste management options
- Reduction in operating costs.