ETNO Common Position on the use of creosote for impregnation of telephone poles

Executive Summary

The Swedish Chemical Agency, (KemI) is proposing that creosote is not included in Annex 1 of the Biocides Product Directive, thereby effectively prohibiting its continued use. An analysis of consequences regarding community, environmental, working environment (except human exposure/human toxicity) and safety aspects as well as total costs, has not been carried out.

ETNO considers that a controlled, continued use of creosote for the impregnation of telephone poles should be permitted. A ban would result in very high costs and radically increased carbon dioxide emissions as currently there is no sustainable alternative. Additionally, finding and assessing such an alternative will take a long time because lifetimes of over 30, preferably 40 years are required.

ETNO therefore asks the European Commission to perform a socio-economical analysis of the consequences of the proposed creosote ban, as well as to take such action that continued use of creosote as a wood preservative is permitted.

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 the use of hazardous substances in general and biocides in particular.

Creosote and CCA have earlier been defined as hazardous and restrictions on the use and reuse of impregnated telephone poles have been introduced. The Swedish Chemical Agency, (KemI) is now proposing that creosote is not included in Annex 1 of the Biocides Product Directive, thereby effectively prohibiting its continued use.

KemI has motivated a ban with the risk of human exposure during the handling of creosote oils or creosote impregnated wood products. The
highest exposure risk has been found in the production of Creosote and in
the wood impregnation process. The impregnated product as such or waste
management of the product has not been deemed a risk. A consequence
analysis regarding community, environmental, working environment
(except human exposure/human toxicity) and safety aspects as well as
total costs, has not been carried out - either nationally or for the European
Union at large.

An ETNO survey in 2005 showed that the major European telecom
operators had more than 35 million telephone poles in operation – 45 %
impregnated with creosote and 39 % impregnated with CCA. Newer
estimations indicate the figure could be as high as 50 million poles. The
vast majority of these poles are still in use, so there is a continuing
requirement for wooden poles and approximately 0.8 million new
telephone poles are being purchased on an annual basis.

The present use of creosote is based upon more than 150 years’ experience
during which a large number of other impregnation substances have been
tested and found inferior from environmental, economic and lifetime
points of view, supported also by life cycle analyses. For instance a wood
pole gives 10 times lower emissions of CO₂ compared to a pole made of
steel or concrete.

A total ban on creosote would lead to economic consequences in the order
of billions of Euros. A ban would probably also lead to an extensive
phasing out of physical infrastructure in sparsely populated areas.
Furthermore, with alternative impregnation substances the lifetime of poles
is expected to be considerably shorter than now, maybe as low as 5-15
years instead of 40-60 years. This will increase the need of timber used for
infrastructure construction, increased manufacturing and transportation
effort and CO₂ emissions as well as require more frequent pole testing. In
addition to having shorter lifetime, such poles also present higher risks for
staff during climbing, since they have shown a tendency to break suddenly
without warning. Using other types of poles requires multiple sets of tools
and equipment for the construction and maintenance of pole lines.

The only alternative impregnation substance to creosote for wooden poles
available today is CCB, which has already been found inferior, both from
lifetime and workman safety points of view. To find and assess a
sustainable alternative takes a long time since lifetimes of over 40 years are
required. If a ban on creosote is decided anyhow, it should be combined
with a transition period of at least 20 years with reviews every 5 years to
allow sufficient time for an alternative to be developed.

ETNO admits that creosote has some undesirable properties. However, the
negative aspects of creosote can be managed by better control:

• Poles taken out of operation are returned to the manufacturer or other
suitably qualified professional businesses for re-use, recycling or
destruction, to prevent inadequate and unauthorised use. Creosote
poles can be incinerated with no residue problems.
• Poles are placed away from homes, schools, playgrounds etc. to prevent
frequent contact to skin for the public.
• Strict rules for personnel working with poles (including network repairs) are enforced to prevent contact with creosote.
• Strict requirements on the manufacturer to avoid "bleeding" poles.
• Use of creosote WEI type C instead of type B (20% less biocide, less odour, negligible amounts of naphthalene, dry pole surface)

ETNO considers that a controlled, continued use of creosote for the impregnation of telephone poles should be permitted. Compared to a situation with a ban the benefits would include, but are not limited to:

• Longer lifetime of poles
• Vastly reduced costs for renewal of poles
• Reduced costs for pole testing
• Reduced need of timber for new poles
• Reduced environmental burden caused by transport, CO₂ emissions, hazardous waste treatment, disposal and incineration.
• Improved safety for personnel climbing poles (no sudden breaks)