Q. **Project C-48, Upgrade Distribution Systems**

On page 12 of the report filed at Volume II, Tab 20, Hydro advises that blackjack poles are environmentally unacceptable and references a Department of Environment and Conservation Policy entitled "Policy for Use of Creosote Treated Wood in and Near Fresh Water." Please provide a copy of this Policy.

A. Please see attachment, "Policy for Use of Creosote Treated Wood In and Near Fresh Water".

Policy for Use of Creosote Treated Wood In and Near Fresh Water

POLICY DIRECTIVE

Division:	Water Resources Management		P.D.	W.R. 92-2
Prepared By:	Martin Goebel, P.Eng.		Issue Date:	October 2, 1992
Approved By:	Martin Goebel	Director	Re-Issue Date:	Jan 17, 2001
Approved By:	Ken Dominie	ADM	Review Date:	
Authorized By:	Paul L. Dean	DM	Superseded:	
	Oliver Langdon	Minister	Cancelled:	

Subject:

Use of Creosote Treated Wood In and Near Fresh Water.

1.0 OBJECTIVE

To adopt a consistent approach to the use of creosote treated wood in and near bodies of fresh water in order to protect the water resource from a source of potential pollution.

2.0 INTRODUCTION

Creosote treated wood has been a building material of choice for many years where protection against decay and rot is required. It is effective against marine borers. Before the development of newer products, creosote treated wood, which was first patented in 1838, was used whenever long term durability was required. Creosote is a distillate of coal tar. It contains over 160 compounds but is composed primarily of liquid and solid aromatic hydrocarbons as well as some tar acids and tar bases which provide protection against destructive insects and organisms. Creosote contains impurities that are toxic, carcinogenic and mutagenic. Leaching and weeping of creosote, especially in hot weather is a particular problem.

Creosote treated wood is used in marine installations (wharves, jetties, breakwaters etc), utility poles, railway ties, bridges, dams, retaining walls, guardrails, fences and foundation piling. There are various industry guidelines that deal with the manufacture, handling and use of creosote treated woods. The abandonment of the CN Railway brought to market a large supply of used, but serviceable creosote treated wood. This wood is often being used by the general public for a variety of domestic projects such as retaining walls, shed foundations, wharves, bridges and walkways.

This policy will utilize the provisions of the *Environment Act, SN 1995 c E-13.1*, which requires prior written approval for any alteration of any body of water (Section 11) and which generally prohibits pollution (Section 9).

3.0 LEGISLATION

Environment Act, SN 1995 c E-13.1, Sections 9 and 11.

4.0 POLICY

4.1 The Department of Environment will not recommend approval of any project under Section 11 of the Act if the project involves the use of new or old creosote treated wood in or near any body of fresh water.

4.2 Specifically, but without limitation, no approval will be granted under Section 11 for dams, bridges, walkways, culverts, wharves, pilings, embankment protection or cribbing protection, or any other structure if that proposed structure is designed with the use of creosote treated wood in fresh water.

4.3 For the purpose of definition of a body of water, a body of water is as defined in the Act but also includes wetlands and bogs, any ditch leading to any body of water and any land within 15 m of the high water mark of any body of water.

4.4 The use of creosote is banned for all purposes anywhere in a protected water supply area and anywhere upstream of any drinking water source or swimming area whether protected or not.

4.5 In so far as creosote treated wood is a traditional building material in the marine environment, its use in salt water will not be considered a sole reason for not recommending approval for a project. However, proponents must justify the use and benefits of the material for the particular installation and whenever possible, alternative designs or use of other materials should be considered.

For additional information on this topic or any other water resources related topics please **contact us**

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