

## Checklist for wood recyclers – compliance with RPS 291

This guide sets out the steps that wood recyclers need to take to ensure they are compliant with the requirements set out in RPS 291

1. **Update your Acceptable Materials Schedule** to reflect that potentially hazardous 'amber' waste wood items from demolition or refurbishment can only be accepted at your site if the producers of the waste (ie whoever generated or first handled the waste) are compliant with [RPS 291](#).

To become compliant, producers must sample and test a minimum of one amber item per quarter and **share the results with the WRA**, who will issue a Submission Report. Only with a [Submission Report like this](#) can producers demonstrate compliance (see 4-7 below for full instructions).

Amber items are: Roof timbers; tiling and cladding battens; and timber frames and joists from buildings built between 1950-2006. Amber items also include barge boards, fascias and soffits; external timber cladding; external doors; and external windows from buildings built between 1950 and 1995.

See the WRA's sample [Acceptable Materials Guide](#) and updated [Wood Grading System](#) for guidance.

2. **Ensure all customers who are supplying amber waste wood to your site, including new customers, know what is required under RPS 291.** Make your sales teams aware of RPS 291 and new acceptance criteria so they can communicate this effectively with your customers.

Be clear that, if the producers of the waste take part in sampling and testing, they will limit the cost impact of handling these materials in the long-term. Full details about what is required and why can be found in the [WRA Video](#) and [RPS 291 FAQ](#).

3. **Train operatives inspecting wood on your site to recognise amber items** with the help of the printable [WRA Visual Guide](#). When amber items are identified, ask the supplier of the waste to provide a WRA Submission Report dated within the last three months.
4. **If you/your suppliers cannot demonstrate that all the material your site handles is already compliant with RPS 291, ensure you are meeting your legal duties by taking part in sampling and testing and gaining your own Submission Report.** This will ensure you are compliant while helping the WRA to build the evidence base needed to narrow down the list of amber items, cutting red tape and costs for the industry once the RPS is withdrawn.

5. **Ensure that samples are taken according to the instructions set out** in the [WRA Quick Guide](#) and sent alongside a completed [WRA Quick Guide form](#) to a UKAS accredited laboratory to be tested to the WRA02 testing suite.

Amber items are not that easy to find, so take a sample as soon as you identify one. Samples of wood which is painted or obviously treated with chemicals like creosote should not be sent. The more samples that are sent the better, however these must not be of the same amber item from the same source.

Once a sample has been taken and sent off for testing, there is no need to wait for the test results and this material can be stored and moved as non-hazardous.

6. **Give your chosen laboratory permission for the test results to be shared with the WRA** who will then issue a WRA Submission Report like [this](#). You or your supply chain **MUST** have a submission report to demonstrate compliance.
7. **Provided you or your entire supply chain can demonstrate compliance with RPS 291, amber items can, in the short term, be stored, mixed with non-hazardous wood or moved as non-hazardous** under a Waste Transfer Note, provided they are destined for Chapter IV biomass plants or panel board manufacture.
8. **Be aware** that if testing of amber items does not happen, all amber items will automatically be classed as hazardous once the RPS expires in October 2024 or earlier, creating significant cost and red tape for industry. Through sampling and testing, the list of amber items can be reduced further, meaning that more wood can be recycled rather than sent for expensive hazardous waste disposal.