

Waste Wood Classification - Frequently Asked Questions

Q: What types of hazardous waste wood can be moved under the two new RPSs?

A: Under RPS249 fence posts and decking from Household Waste Recycling Centres (HWRCs) **does not** have to be consigned as potentially hazardous.

Under RPS250, any fence posts or decking from construction and demolition sources must be consigned as potentially hazardous. In addition, structural timbers, tiling battens and external joinery from pre-2007 buildings must also be consigned as potentially hazardous.

However, all of the above materials from C&D sources can be moved under the RPS250 to a reprocessor, where it can be blended into material which can then be used for IED Chapter IV compliant biomass or the manufacture of panel board.

The situation for traditional hazardous waste wood such as telegraph poles and railway sleepers remains the same and must be consigned as hazardous and disposed of in the usual way. These materials are **NOT** covered by RPS 249 or RPS 250.

Q: Can I mix a load of potentially hazardous and non hazardous waste wood to go into a recycler/reprocessor?

A: Where possible the wood should be segregated. However, where this is not physically possible or financially viable, transfer stations and skip operators are permitted to mix the load but have to identify the percentage of potentially hazardous waste wood in the load on a Hazardous Consignment Note.

Q: Who is responsible for working out the percentage of waste wood in a mixed load?

A: The responsibility lies with the first person/operator to receive the load of waste wood before it reaches the recycler/reprocessor, for example the waste transfer station or skip operator.

Q: Do we consign a full load as hazardous because of one piece wood?

A: Yes but then record the percentage of hazardous contained in the load correctly. It is vital that the percentage of potentially hazardous waste wood is recorded as accurately as possible. Consigning a whole load as hazardous when it may in fact only be 1% or 2% will skew the final outcome of how much waste wood is hazardous in the UK. That will have a longer-term negative impact on our industry and will result in operators being forced to dispose of waste wood that is not hazardous through a hazardous route, reducing our material stream and costing operators more money.

Q: Will the reprocessors/recyclers check the accuracy of the percentage of potentially hazardous waste wood in a load?

A: In theory reprocessors and recyclers do not have to check that the percentage listed is correct. However they may wish to in order to ensure they are charging the correct fee for the grade of waste wood they are receiving.

The WRA is also recommending to its members that it will be good practice to check the loads and make their own separate recording of the actual percentage of potentially hazardous waste wood in each mixed load they receive to assist with future discussions

Q: Does my site have to have a hazardous permit to receive waste wood under RPS249 or RPS250?

A: No, as long as you are following the Waste Wood Assessment Guidance and your outlets are Chapter IV or panelboard mills, you do not need to have a hazardous permit to receive this wood under RPS250. The only exception to this is any Grade D wood.

Q: How long do I have to change my permit if I want to get a hazardous wood permit?

A: You would need to speak to your local EA officer to check that but RPS249 expires on March 31st 2024 and RPS250 expires on August 31st 2023.

Q: How do we know if the wood we have on site is hazardous under the new RPS or not?

A: The WRA has produced a Waste Wood Assessment Guide. This guide provides a detailed assessment process for all wood types and where they can be used. If you are still in doubt you can also obtain a WM3 assessment via an independent testing facility. The Waste Wood Assessment Guidance is downloadable from the homepage of the WRA website www.woodrecyclers.org.

Q: Should I be charging more for waste wood received under RPS 249 or RPS250?

A: You should be aware that there will be costs involved for completing the EA paperwork and additional reporting so you may want to take that into account and each reprocessor will need to review their own costs to ensure these are covered..

Q: What paperwork do we need to use?

A: For RPS249 you will use a standard Controlled Waste Transfer Note (WTN) as the material is coming from a Household Waste Recycling Centre and is therefore not classed as potentially hazardous.

For RPS350 the load will be going into a recycler/reprocessor as a potentially hazardous load and will therefore be subject to a Hazardous Consignment Note. You will also have to record any hazardous consignment notes on your regulatory returns.

Once the raw material is processed at a recycling yard it can then move to panelboard or IED compliant biomass facilities with the usual Waste Transfer Note.

Q: What should waste sites in Scotland, Wales and Ireland be doing at the moment as they aren't covered by the RPSs?

A: As far as we are aware the regulators in those nations will expect operators to continue as normal until they have formalised their position further. We are working with them on this and hope to have an answer very soon.

Q: If other contaminants such as asbestos is found within construction and demolition waste wood, greater than 0.1%, this would normally be classed as hazardous under WM3, so can this now be sent to a wood recyclers to be blended?

A: No these RPSs only apply to waste wood. Any other contaminants should be treated the same way as before.

Q: I collect wheeled bins from refurbishment companies containing waste wood. Can a day's worth of bins be seen as a single load or do I have to assess each bin individually?

A: This would depend on how you currently use your Waste Transfer Note system. You can issue annual Waste Transfer Notes but if any material is hazardous you would have to issue a separate Hazardous Consignment Note. If you collect this material regularly, you should firstly use the Waste Wood Assessment Guide, and if you are still unsure then get the material tested to establish whether it is hazardous or not.

Q: We are a furniture manufacturer. Does the RPS apply to us?

A No, it's business as usual.

Q: What about waste wood produced as part of a manufacturing process?

A: It's business as usual. Check the grade according to the Waste Wood Assessment Guidance. If it is non hazardous it can be moved under a standard EWC code.

Q: How will a construction and demolition hazardous waste consignment work when it is delivered by a broker?

A: Waste Transfer Notes and Hazardous Consignment Notes follow the waste, and clearly state if a broker is involved. This process hasn't changed.

Q: Are we making sure that construction and demotion companies understand their responsibilities? Could they end up having to test almost every skip?

A: Yes both CIWM's C&D Waste Forum and the National Federation of Demotion Contractors will be briefing their members and the wider industry so that they understand their responsibilities. They will be encouraged to use the Construction Assessment Guide, and if they are still unsure as to the grade of material they are handling, they should obtain a test certificate to verify what wood they have.