

## **Waste Wood Classification - Frequently Asked Questions on Demolition** **Waste Wood with removal of RPS250 and introduction of RPS291**

### **For Demolition Contractors, Skip Operators, Waste Management Companies, Roofing Contractors and Window/Door Installers**

#### **Q1: What does the introduction of the new RPS291 mean for me?**

**A:** It will make it more practical to meet regulatory requirements while still ensuring compliance.

RPS 291 allows, in the short term, for potentially hazardous 'amber' waste wood items\* removed from domestic premises, demolition sites or other buildings to be stored and processed as non-hazardous provided the material is tested at least quarterly and the results are shared with the WRA.

This means that **producers still need to test amber material, but will no longer have to test every item or consign them as hazardous in order to achieve compliance.**

**Importantly, those who do not share their test results with the WRA and receive a submission report will NOT be compliant under the RPS. Furthermore, the RPS is short term and if testing does not happen, it could be removed at any time.**

For more information, see [WRA welcomes launch of RPS 291 - Wood Recyclers Association](#). NB. This RPS expires on 1 October 2024 and could be withdrawn before if sampling/testing is not forthcoming and the results shared with the WRA.

Whilst the other UK environmental regulators have not published new positions, they are supporting all of the WRA guidance, so the same principles will apply in Scotland, Wales and Northern Ireland.

#### **Q2: What do we need to do with waste wood?**

**A:** You should speak to your wood processor and ask for a new Acceptable Materials Schedule as most waste wood is not affected but some new unacceptable items will have been added. The withdrawal of Regulatory Position Statement 250 by the Environment Agency on September 1 2023 in England and withdrawal of similar positions in Wales, Scotland and Northern Ireland as well as the introduction of RPS291 means that structural timbers, wooden tiling battens and external joinery from pre-2007 buildings, which could be sent for recycling or recovery under RPS250, will no longer be accepted at wood recycling sites, unless they comply with the new RPS 291 conditions of being tested at least quarterly and their results being shared with the WRA. If you do this you will receive a WRA Submission Report which proves compliance. Under RPS291 you do not need to wait for your test results or store separately, as amber items can be moved as non-Hazardous to sites participating in the RPS291 project.

#### **Q3: What do we need to do with the 10 items listed below from pre-2007 buildings?**

**A:** The 10 items which are potentially hazardous are: Barge boards, fascias, soffits, wooden windows, conservatories and doors, roofing timbers, tiling/cladding battens and timber frames/joists. **You will see from the WRA Waste Wood Assessment Guide that external joinery (windows and doors), barge boards, fascias and soffits and external timber cladding are only potentially hazardous if they are from buildings constructed before 1996.**

All of these 10 items must be identified by the producer of the waste, a minimum of 1 item per job should be tested each quarter as per RPS291 using the WRA02 testing suite and the results submitted to the WRA. **It is essential that you share the test results with the WRA to ensure that all data is included in the final analysis which will hopefully mean that the list of 10 will be shortened.**

**We know that there is only a tiny amount of this wood in the waste stream and that the vast majority of waste wood is non-hazardous including wood from construction sites. We therefore need to keep perspective on this and ensure that we don't spread panic and create situations where waste management companies are refusing to take any waste wood or encouraging fly tipping or burning of wood, that could be used and recycled into panel board or biomass fuel. See [WRA reassures businesses ahead of RPS 250 deadline - Wood Recyclers Association](#)**

**Q4: What kind of testing needs to be done?**

**A:** The WRA 02 testing suite needs to be carried out on the potentially hazardous waste wood item. See details below (NB. Using this suite instead of asking for full WM3 testing will save you money):

<b>WRA02 Testing Suite – August 2023</b>		
		<b>WRA02 C &amp; D</b>
Arsenic	As	x
Barium	Ba	x
Cadmium	Cd	x
Chromium	Cr	x
Copper	Cu	x
Lead	Pb	x
Mercury	Hg	x
Nickel	Ni	x
Selenium	Se	x
Zinc	Zn	x
PAH - Speciated (EPA 16)		x
Antimony	Sb	x
Dieldrin		x
Lindane		x
Permethrin		x
Pentachlorophenol (PCP)		x
Moisture Content		x
Tin	Sn	x
<b>Where Tin &gt;25mg/kg</b>		
Tributyltin		x
<b>Sample Prep</b>		
Acid Peroxide Extraction		x
No smaller than 150 mm long		x

## Q5: Who can do the testing for us?


**A:** Any UKAS accredited laboratory can do the testing for you as long as they test to the WRA02 testing suite and understand the correct species to test for and you use the [WRA Quick Guide Form](#) for each sample. We have **five** WRA member laboratories who can do the testing for you. (See list below) and on our website at [WRA Members - Wood Recyclers Association](#).

## WRA Member Laboratories

<p><b>Alfred H Knight (Prescot)</b> Kings Business Park Kings Drive Prescot L34 1PJ <b>Ken Hepburn</b> 0151 481 5850 <a href="http://www.ahkgroup.com/markets/solidfuels/solidfuels@ahkgroup.com">www.ahkgroup.com/markets/solidfuels/solidfuels@ahkgroup.com</a></p>	<p><b>Marchwood, Part of Cawood</b> Unit 1A.2A Marchwood Industrial Park Marchwood Southampton Hampshire SO40 4BL <b>Ben Rowe</b> 02380 786979 <a href="http://cawood.co.uk/marchwood/">cawood.co.uk/marchwood/</a> <a href="mailto:Ben.rowe@marchwood-scientific.co.uk">Ben.rowe@marchwood-scientific.co.uk</a></p>	<p><b>SOCOTEC UK Ltd</b> Renewable Energy Unit 3 Canal Street Burton on Trent DE15 0YZ <b>Katy Strudwick</b> 07880 004610 <a href="http://socotec.co.uk">socotec.co.uk</a> <a href="mailto:Kathryn.Strudwick@socotec.com">Kathryn.Strudwick@socotec.com</a></p>
<p><b>Envirochem Analytical Laboratories Ltd</b> 12-14 The Gardens Broadcut Fareham PO16 8SS <b>Daniel Dockree</b> 01329 287 777 (Extension 2) <a href="http://envirochem.co.uk/">envirochem.co.uk/</a> <a href="mailto:Daniel.Dockree@envirochem.co.uk">Daniel.Dockree@envirochem.co.uk</a></p>	<p><b>Envirolab Ltd</b> Hattersley Science and Technology Park Housesteads Off Stockport Road Hattersley SK14 3QU <b>Holly Neary-King</b> 0161 368 4921 <a href="http://www.envirolab.co.uk/">www.envirolab.co.uk/</a> <a href="mailto:hnearyking@envirolab.co.uk">hnearyking@envirolab.co.uk</a></p>	<p><b>SGS United Kingdom Ltd.</b> Aurora Court Barton Road Riverside Park Middlesbrough Cleveland TS2 1RY <b>Nick Athey</b> 07518 614 733 <a href="http://www.sgs.com">www.sgs.com</a> <a href="mailto:nick.athey@sgs.com">nick.athey@sgs.com</a></p>

**Always send your samples with:**

1. A Quick Guide **form for each Sample** - fully completed and test identified
2. A **Chain of Custody form** for each batch of samples from the lab
3. Other Laboratories can be used but **always use WRA02 approved testing suites** and forms to allow the right data to be captured
4. If sites don't **share data**, then we won't get to required numbers to confirm haz wood types – so please **give permission** to share data with WRA



## Q6: Do I need to submit multiple samples from the same load/skip/site and how often do I need to sample/test?

**A:** No. You only need to submit a maximum of one sample of each type that you have from the same load/skip/site and you only need to get these samples tested once a quarter. Ideally get the samples tested as soon as they come onto your site. The more samples submitted from a variety of sites for testing, the more chance we have of proving that some of the items are not hazardous and we can therefore reduce the list of 10 to a few remaining which will need to come out of the waste stream. Please note Amber items that have been tested do not have to wait for results to come back and can be moved with non-hazardous wood under RPS291 to participating processors. It is the Submission report which confirms compliance not the result.

## Q7: How do I prepare the samples?

**A:** See the [Quick Guide Form](#) for details. Please do not shred the items. All you need to do is ensure that the samples taken are from whole pieces of the identified 10 items and are **not painted or taken from known hazardous items such as those treated with creosote**. Then take a cross section from the middle - no smaller than 150mm long (200 grammes) - which should be sent to the lab and tested using the WRA02 suite. Please only take one sample from each item. The samples will need to be securely wrapped in airtight packaging (e.g. rubble sacks secured with cable ties or shrink wrapped) for posting and **must have the Quick Guide Form** with the completed information inside the packaging.

### **Q8: Who pays for the testing?**

**A:** Duty of Care sits with the producer of the waste so it should be the producer of the waste who pays for the testing.

### **Q9: Why is it so important to share the results with the WRA**

**A:** Five years ago, the UK regulators asked the WRA to lead the Waste Wood Classification Project on behalf of the wider waste wood industry. See [WRA-Waste-Wood-Assessment-Guidance-V2-November-2021.pdf \(woodrecyclers.org\)](#) for more information.

They have also asked the WRA to lead the collation of all sampling/testing results and to analyse the results on HazWasteOnline (HWOL) to assess whether they are hazardous or non-hazardous.

This means that the assessment is free of charge and this fee won't be added to your testing fee. It also means that the results will help to hopefully reduce the 10 items to one or two that may have to be removed from the waste stream in the longer term.

### **Q10: If I have already done testing and not given the results to anyone, what should I do?**

**A:** Please ask your laboratory to share the raw testing results with us via email to [technical@woodrecyclers.org](mailto:technical@woodrecyclers.org) or via HWOL to the WRA account (ask us for details) and we can then analyse them FOC on HWOL and they will be included in the final assessment. The laboratory will share your results anonymously.

### **Q11: What happens if our customers do not identify these items within their skip/load or they hide them at the bottom of a skip/load?**

**A:** As a responsible waste operator, you will need to prove that you have done everything in your power to explain to your customers what they need to do now that RPS250 has been withdrawn and RPS291 introduced. The WRA toolkit at [WRA Waste Wood Classification Toolkit](#) can help you to do this. You may want to update your paperwork accordingly, particularly skip notes/delivery tickets, which could have a question relating to how old the building is where the waste is coming from.

### **Q12: What happens if the waste wood is coming direct from a householder?**

**A:** Householders can still dispose of their waste wood themselves at their local Household Waste Recycling Centre (HWRC) without being affected by the new regulations. However, if they use a skip operator or their roofing contractor/window/door installer to dispose of their waste, then these contractors still need to follow the same rules as for commercial waste. This means that at least 1 of the 10 waste wood items from pre-2007 buildings will need to be tested at least quarterly by the contractor and the results submitted to the WRA, which will result in the contractor being compliant under RPS291. Paperwork from the skip operator/roofing contractor/window/door installer should reflect that the origin of the material is a householder. Please see [RPS291](#) which provides some flexibility on how this works in practice.

### **Q13: What happens if the waste wood is in a mixed skip/load?**

**A:** The same principles apply, so, if possible, the producer of the waste needs to identify what age building the waste is from and whether it includes any of the 10 items. It is also likely that there will be very small amounts of the 10 items in a mixed skip and, as per the answer to Q10 above, as long as you have done everything in your power to explain what needs to happen to your customers, if small amounts still remain in the waste stream, it will be processed into suitable end markets. However, if large quantities of these items are knowingly included in mixed skips, this is not acceptable.

**Q14: If the waste wood does test hazardous, where can it go?**

**A:** Under RPS291, the wood will have moved on before the results come back and either way, Amber items can still move as non-hazardous and be processed for the approved end markets of Chapter IV compliant biomass and panel board manufacture. However if the items are known hazardous, i.e. railway sleepers, telegraph poles or items which have been treated with creosote, there are currently two outlets for this - Trackwork and Twinwoods - see [here](#) and [here](#) for contact details on the WRA website.

**Q15: Do you have pictures of the 10 potentially hazardous items from pre-2007 buildings or visual guides that can help us to identify them?**

**A:** Yes, these can be found in the [WRA Waste Wood Assessment Guide](#) and in the closely aligned [Waste Wood Assessment Guidance for the Construction and Demolition Sector](#). There is also a printable poster/visual guide on the WRA website at [WRA Visual Guide on Potentially Hazardous Demolition Waste Wood \(woodrecyclers.org\)](#) Remember - Paint is not a treatment we are looking for.

**Q16: Would it not be easier to ask local authorities and others to do a survey on their building ahead of any demolition work?**

**A:** This is something the UK regulators are currently discussing with local authorities/housing associations and others as it would be a good idea if a waste wood survey could follow the same principles as an asbestos survey, so that any potentially hazardous waste wood is identified before demolition work commences. The current work to reduce the number of Amber items will also feed into this work going forward.

**Q17: Why is it so important to sample/test?**

**A:** It is essential to sample and test at least quarterly to demonstrate environmental responsibility and minimize the loss of a valuable commodity by ensuring that the correct waste wood goes to suitable end markets. The testing of the 10 identified items will mean that the list can be reduced potentially to one or two items that may remain hazardous in the future and will reduce the amount of testing required in the future.

**Q18: Why are wood recyclers not changing their permits so that they can accept this potentially hazardous waste wood?**

**A:** It has already been identified that these 10 potentially hazardous waste wood items only account for around 4,000 tonnes out of circa 400,000 tonnes of demolition waste wood. It is therefore unnecessary for wood recyclers and their supply chain to commit to the high costs, resource input, long time periods for approval and potential planning implications to change to a hazardous permit for such a small quantity of material. **In addition, panel board manufacturers and biomass operators have already made it clear that they do not accept known hazardous material now and will not do so in the future.**

**Q19: Why are we only finding out about these changes/the need to sample/test these 10 waste wood items from pre-2007 buildings now?**

**A:** The WRA has been working collaboratively with trade associations across the construction and demolition sector for the last five years and guidance documents for the waste wood and construction and demolition sectors were produced in 2021 and widely promoted (See [WRA Waste Wood Assessment Guide](#) and [Waste Wood Assessment Guidance for the Construction and Demolition Sector](#)). Both the WRA and the NFDC (National Federation of Demolition Contractors) have been trying to get samples in from 2020, taking feedback and communicating what will happen if not enough samples are received to prove the case either way. A range of workshops for those involved have been delivered already and will continue to be offered – see the toolkit on our website for details. If you would like to hold one for your business or trade association, please contact [technical@woodrecyclers.org](mailto:technical@woodrecyclers.org)