

Waste Wood Classification - Frequently Asked Questions on Demolition Waste Wood once RPS250 is removed from 1st September 2023

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

Q1: What do we need to do from September 1st 2023 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 means that structural timbers, wooden tiling battens and external joinery from pre-2007 buildings, which can currently be sent for recycling or recovery under the RPS, will no longer be accepted at wood recycling sites. These will only be accepted if tested to show they are not hazardous by being sent off for a simple test.

Q2: 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, tested and assigned/consigned as appropriate. **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](#)

Q3: Does the introduction of the new RPS291 in October 2023 affect this?

A: Yes in so far as 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.

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**):

WRA02 Testing Suite – August 2023		WRA02 C & D
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
Where Tin >25mg/kg		
Tributyltin		x
Sample Prep		
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 you use the WRA Quick Guide Form for each sample. We have three WRA member laboratories who can do the testing for you. (See list below). If you are a WRA wood recycling member, the WRA will pay for the testing for as long as the budget allows. Information about membership of the WRA as a recycling member can be found on our website at Become a Member - Wood Recyclers Association.

WRA Member Laboratories

ALFRED H KNIGHT (Prescot)

Kings Business Park
Kings Drive
Prescot
L34 1PJ
Ken Hepburn
0151 481 5850
www.ahkgroup.com/markets/solid-fuels/solidfuels@ahkgroup.com

MARCHWOOD, PART OF CAWOOD

Unit 1A.2A Marchwood Industrial Park
Marchwood
Southampton
Hampshire
SO40 4BL
Ben Rowe
02380 786979
cawood.co.uk/marchwood/Ben.rowe@marchwood-scientific.co.uk

SOCOTEC UK Ltd

Renewable Energy
Unit 3
Canal Street
Burton on Trent
DE15 0YZ
Anna Lloyd
anna.lloyd@socotec.com
07803 262 082
socotec.co.uk

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 suite** and form 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 one sample of each type that you have from the same load/skip/site and you only need to get these samples tested once. 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.

Q7: How do I prepare the samples?

A: See the Quick Guide Form for details. There is no need to 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 from known hazardous items such as those treated with creosote. Then take a cross section from the middle - no smaller than 150mm long - 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. The WRA are currently paying for testing of samples sent in by their wood recycling members, who receive waste wood directly from demolition contractors.

See Become a Member - Wood Recyclers Association for further information on potential membership of the Wood Recyclers' Association.

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 julia.turner@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 when RPS250 is withdrawn. The WRA toolkit at [Toolkit For Withdrawal of RPS 250 - Wood Recyclers Association](#) 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 the 10 waste wood items from pre-2007 buildings will remain hazardous unless tested and proved otherwise. 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 ten 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: There are currently two outlets for hazardous waste wood - Trackwork and Twinwoods - see [here](#) and [here](#) for contact details on the WRA website.

Q15: Do you have pictures of the 10 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 \(woodrecyclers.org\)](#)

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.

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

A: It is essential to sample and test 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 to one or two items that may remain hazardous in the future. It is also essential to identify and assign/consign these items as, otherwise, they may get mixed with other waste wood and this could mean that very small quantities of potentially hazardous waste wood could be mixed with large quantities of non-hazardous material and this important feedstock for panel board manufacturing and biomass will be lost.

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 [here](#) and [here](#) for video recordings of two examples. If you would like to hold one for your business or trade association, please contact julia.turner@woodrecyclers.org