

The Wood Recycling Industry Code of Practice



Produced by the Wood Recyclers Association

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The Wood Recycling Industry Code of Practice

Foreword

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Recycled wood is a major source of raw material for the manufacture of wood particleboards. As new markets develop there will be increasing demands placed on the wood recycling industry in respect of sourcing, segregation and tightening environmental standards. We welcome the Wood Recyclers' Code of Practice as a tool to support those companies who are striving to grow and develop their businesses in a responsible and sustainable manner. Raising standards across the industry will be to the benefit of all concerned and we would encourage the wood recycling industry to embrace the Code of Practice.

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Executive summary

The growth of the UK wood recycling industry has led to a higher burden of responsibility upon the sector to demonstrate its responsibility and sustainability. This Wood Recycling Code of Practice has been developed to enable responsible wood recycling operations to differentiate themselves from organisations which do not have a longer-term commitment to the future of the sector.

The Code was developed during a one-year consultation process involving a range of bodies including the Wood Recyclers Association (WRA), the Waste & Resources Action Programme (WRAP), customer groups, Government, regulators and a cross section of wood recycling operations. There was widespread agreement among these stakeholders that the Code could provide a number of benefits:

- Creation of a stable and level playing field for responsible recycling operations.
- Addressing topical issues of supply.
- Promoting the professionalism of the industry to suppliers, customers, regulators and Government; and
- Providing a system of certification for management systems for environmental, health, safety and quality issues at reasonable cost.

The Wood Recycling Code of Practice is a voluntary initiative open to both members and non-members of the WRA. Wood recyclers can choose whether or not to subscribe to the Code and those that do subscribe to the Code will be required to meet certain conditions in order to be accepted into membership. Their performance will be scrutinised by an independent third party auditor.

The sector's trade association, the WRA, has been a driving force behind the Code. The organisation has made compliance with the Code of Practice a condition of membership. The WRA recognises the benefits that Code membership can bring through the discipline of independent third party audits with regard to a range of operational issues.

It is hoped that wood recyclers, both WRA members and non-members, will want to sign up to the Code. It is anticipated that key customer groups will confer preferred supplier status to Code members.

By dealing with a wood recycler which is a Code of Practice member, such stakeholders can be confident that they are dealing with a responsible company, which operates to agreed standards and has undergone independent third party scrutiny.

1 Introduction

The wood recycling industry has developed rapidly, processing over 1.9 million tonnes of material in 2007. The panelboard mills have been the dominant market for the material, though other higher-value uses are developing such as animal bedding, horticultural surfaces and biomass. It is envisaged that the use of wood for energy will become an increasingly important outlet.

1.1 What is a Code of Practice?

A code of practice is generally defined as a set of rules that a group of businesses agree to follow in order to set higher standards. In most cases signing up to a code is voluntary rather than a legal requirement, though some trade bodies make code participation a requirement of membership.

A wide range of bodies operate codes of practice, with the majority being trade bodies which are aiming to promote member interests. The focus of the codes varies according to industry, with some being consumer orientated while others are operation orientated.

1.2 Why a Code of Practice?

The wood recycling industry has developed rapidly into an important and sustainable industry. In order to safeguard existing markets and encourage long-term growth in existing and developing markets, it is important that the industry has the confidence of a wide range of stakeholders including suppliers (those who provide wood materials for recycling), customers who buy recycled wood products, Government policy makers and regulators.

Stakeholders such as panelboard mills and energy generators are coming under increasing pressure from environmental legislation. The long-term future of the relationship between such customers and the wood recyclers can be protected by ensuring that the wood recyclers do as much as possible to make sure that their product meets the required quality standards without entailing costly over-processing.

The Code is designed to instil confidence in these stakeholders: by dealing with a wood recycler which is a Code of Practice member, you can be confident that you are dealing with a responsible company, which operates to agreed standards and has undergone independent third party scrutiny.

1.3 Aims and objectives

The central aim of the Code is to enable responsible wood recycling operations to demonstrate their sustainability and their commitment to the future of the sector. To this end there are a number of objectives for the Code:

- Enable stakeholders to identify responsible operators.
- Ensure that members have systems in place which enable them to meet stakeholder expectations.
- Enable members to identify and implement best practice regarding key areas of operational practice; and
- Provide a document against which an independent third party can conduct audits.

1.4 What the Code of Practice is not

During the formative stages of the Code, it became clear that there was a wide range of opinion as to what a Code might achieve. Following extensive consultation, agreement was reached on the aims and objectives as stated in Section 1.3, page 2. It was also noted that it would be useful to make it clear what the Code of Practice is not:

- The Code is not a product standard; and
- The Code is not the same as the Protocol on the Verification of Wood Packaging. The Protocol concentrates solely on the receipt of incoming packaging material whilst this Code covers a range of operational areas.

1.5 Why follow a Code of Practice?

The Wood Recycling Code of Practice is a voluntary initiative. Wood recyclers can choose whether or not to subscribe to the Code. Those that do subscribe will undergo third party audit to ensure that they meet the requirements of the Code. Companies which meet or exceed these requirements will be accepted into membership.

The sector's trade association, the WRA, has been a driving force behind the Code. The organisation plans to make membership of the Code of Practice a condition of WRA membership.

It is believed that this Code of Practice will generate a variety of benefits for WRA members and for other wood recyclers which choose to participate:

- Demonstrate the professionalism and credibility of members.
- Provide confidence to suppliers, customers, regulators and end-user markets.
- Demonstrate effective self-regulation without the need for additional legislation.
- Facilitate the adoption of best practice and ensure continuous improvement.
- Provide a framework to address emerging issues.
- Potentially reduce insurance premiums; and
- Deliver commercial benefits to signatories.

1.6 The development of the Code

The Code of Practice was developed during a one-year consultation process through funding from the Government's Waste & Resources Action Programme. The consultation process and development of the Code were undertaken by Dr Alistair Bromhead, an industry consultant. Guidance was provided by a steering group consisting of representatives from:

- Waste & Resources Action Programme (WRAP).
- Wood Recyclers Association (WRA).
- Wood Panels Industries Federation (WPIF).
- Urban Harvest UK Ltd; and
- Envirobusiness South East Ltd.

Site visits and phone discussions were held with a cross section of wood recycling operations, suppliers, customers, Government policymakers and regulators.

2 The operation of the Code of Practice

The smooth operation of the Code requires wood recyclers and stakeholders to have a good understanding of the mechanisms through which membership is assessed and awarded. This section considers the mechanics and practicalities of the Code.

2.1 The Wood Recycling Code of Practice Authority

The Wood Recycling Code of Practice Authority (WRCPA) will be established to manage the Code. This body will consist of a steering group with representatives from a range of organisations including:

- Wood Recyclers Association.
- Wood Panel Industries Federation.

This body will have responsibility for:

- Establishing an audit protocol for verifying compliance with the Code.
- Preparing and publishing Code documentation.
- Vetting applications for Code membership.
- Award of Code certificates and logos.
- Maintaining a register of members.
- Maintaining a register of approved third parties for the conduct of audits.
- Maintaining a record of requirements and recommendations stemming from audits.
- Maintaining a register of legislation and updating service for members.
- Taking appropriate action against Code members for non-compliance.
- Compiling information collected from member companies.
- Coordinating the generation and dissemination of Code publicity; and
- Updating the Code to ensure its continuing relevance to the wood recycling sector.

2.2 Code documentation

Two key documents exist to support the Wood Recycling Industry Code of Practice:

a) Code of Practice

This document is naturally the cornerstone of the Code of Practice initiative. The document is publicly available both as a brochure and in due course will be as a downloadable document from the WRCPA website. The Code is to be reviewed on a regular basis by the WRCPA to ensure continuing relevance to the industry.

The Code contains requirements on a range of operational issues such as:

- Management of suppliers of wood materials for recycling.
- Management of incoming materials.
- Environmental management.
- Health and safety management.
- Quality management.
- Engagement with customers.

In order to achieve Code membership, companies must be able to demonstrate to an independent third party that they meet these requirements. Furthermore, the Code highlights a number of areas of best practice which participants are advised to consider for implementation as part of their continuing improvement programmes.

b) Code Guidance Workbook

The guidance workbook plays an important role in facilitating improvement by providing practical guidance to companies on how they might address key issues contained in the Code. The document also provides templates which can be adapted to form the basis of documented systems.

2.3 Demonstrating the achievement of standards

In order to achieve Code membership, a wood recycling operation will be required to complete the following stages:

- Completion of initial application form.
- Review of application form by WRCPA.
- Initial audits by a WRCPA approved auditor. The site will be assessed against the requirements of the Code's audit checklist. The initial audit will generate a written report containing requirements and recommendations. The auditor can recommend the following options to the WRCPA:
 - Rejection of application: company falls well short of the required standards at the present time.
 - Provisional acceptance of membership: pending submission of postal evidence or the conduct of a follow-up site visit as required, that all requirements have been actioned within a specified time period – typically three to six months. Full membership will be granted once satisfactory evidence has been submitted; and
 - Acceptance of membership: company has demonstrated that it meets the requirements for Code membership.
- Subsequent re-auditing: member sites will be re-audited on an annual basis, or more frequently if the WRCPA has reason to suspect a transgression of the Code. Again, a report containing requirements and recommendations will be issued, with postal evidence required within a specified time period to ensure that requirements have been actioned. The main point of contact for this auditing will be the company's nominated code representative.
- A Code membership certificate will be issued to those companies which meet the required standard. A list of Code members will be maintained on the WRCPA website.

2.4 Auditing

Members and potential members can choose from a range of WRCPA approved auditors. These must complete an application process to demonstrate adequate knowledge of the wood recycling industry and auditing in general. Once approved, auditors will be issued with the Code audit checklist, against which companies can be assessed. A list of approved auditors is maintained on the WRCPA website.

2.5 Complaint resolution

Any complaints about the Code, its members or auditors, should be addressed to the WRCPA. This body can take a range of actions in the event of audit non-compliances or justified complaints from stakeholders:

- Request for the submission of information by the Code member or auditor.
- Written requirement or recommendation for improvement; or
- Removal of Code membership.

2.6 How can stakeholders make use of the Code?

A key aim of the Code is to instil confidence in stakeholders such as suppliers, customers, Government and regulators that by dealing with a wood recycler which is a Code of Practice member, you can be confident that you are dealing with a responsible company, which operates to agreed standards and has undergone independent third party scrutiny.

It is envisaged that those involved in the purchase of recycled wood products will consider making Code membership a condition of supply. Such a requirement will help to demonstrate that diligence has been exercised with regard to the purchasing decision. It will also help customers to meet the obligations of corporate social responsibility policies and ISO systems.

As a further aid for current and potential suppliers and customers, checklists have been included in Appendices 1 and 2. These illustrate the range of questions which might be asked of wood materials for recycling contractors and recycled wood product suppliers to ensure that they are operating in a responsible manner.

In addition, a standard clause has been prepared which customers such as local authorities might want to consider for adoption and/or adaptation for use in their own purchasing policy:

Recycled wood products such as mulches, animal bedding, biomass, board products raw material:

‘Preferred supplier status will be given to companies which have achieved membership of the Wood Recycling Code of Practice as membership involves third party auditing to ensure that a range of operational standards are achieved and that the company is operating responsibly.’

3 The wood recycling Code of Practice

The Code places a series of requirements upon members with regard to key areas of their operations from goods-in through to the sale of their finished product.

3.1 Management of suppliers of wood materials for recycling

The suppliers of wood to recyclers are crucial to the success of the industry. Proper management of these organisations helps to ensure that wood for recycling is of the appropriate quality. Failure to manage the relationship with suppliers correctly will create a range of problems associated with quality, legal compliance and machinery wear.

Hazardous contamination in a load of wood for recycling causes Environmental Permit or Exemption compliance problems for a wood recycler; the terms of a Waste Carriers Licence will also be contravened if such material is transported. Other contaminants will cause practical problems. For example, if a brick enters a wood chipper, it will break into thousands of pieces, cause machinery wear throughout the process and interfere with the quality of the finished product. Therefore, the exclusion of contaminants at source is vital to the success of the wood recycling industry.

To ensure that a consistent stream of acceptable quality material is maintained, Code signatories are required to establish a documented system for dealing with suppliers of wood materials for recycling. As a minimum, this should include:

- **Provision of documentation on acceptable/non-acceptable material**
Wood recyclers conduct their business with a view to producing specific products. These range from high value-added goods to products with lower quality specifications. Each of these products can only make use of a specific range of raw materials and it is important that the supplier of wood for recycling has written confirmation of the types of material which will be acceptable.
- **Provision of a written summary of the consequences of non-acceptable material**
It is important that suppliers of wood for recycling are aware of the practical, procedural and financial consequences of supplying contaminated loads. Written information should be provided regarding the warnings, financial penalties and potential return of contaminated loads.
- **Recording and reporting system for problem loads**
If loads do not match the requirements of the agreed specification of wood for recycling, the nature of the problem should be recorded and reported to the supplier.
- **Provision of carrier registration certificate to all new suppliers from which wood for recycling is being collected**
Waste from another company can only be transported by an authorised carrier in accordance with the Environmental Protection Act 1990, Part II. In order to generate a Duty of Care paper record, suppliers of wood waste for recycling should be provided with a waste carrier registration certificate; and
- **Provision of transfer notes to all suppliers (statutory duty)**
The Duty of Care requires that waste is accompanied by a transfer note which has a number of pieces of information including the relevant European Waste Catalogue code for the waste stream. Notes can either be provided annually or for each trip.

As well as providing written documentation, many wood recyclers will also want to visit potential new suppliers to inspect the wood generation process and provide site-specific advice with regard to acceptable material, typical problem issues and Duty of Care requirements.

3.2 Management of incoming materials

Once material has been received by the wood recycling site, it is essential that a system is in place to ensure that:

- The load is checked against the specification agreed in the contract with the supplier of the wood for recycling.
- Unacceptable contaminants are identified and removed.
- The percentage of packaging wood waste is identified where the site or its customers may want to issue Packaging Recovery Notes (PRN).

The Protocol for the Verification of Wood Packaging Waste in the United Kingdom provides a method for the inspection and recording of incoming materials. The Protocol aims to provide confidence in the claimed level of wood packaging waste recycling in the UK by the accurate identification and quantification of wood packaging waste destined for recycling and the creation of documented audit trails that will be subject to independent verification.

Code members are required to comply with the requirements of the Protocol for the Verification of Wood Packaging Waste in the United Kingdom, where relevant.

3.3 Environmental management

The wood recycling industry converts wooden materials, which might otherwise be destined for landfill, into value-added products. Such a beneficial environmental impact needs to be sustained through good environmental management practices on-site.

Wood recyclers already receive a significant number of third party visits regarding environmental management issues. This Code seeks to avoid the duplication of control and to facilitate the establishment of a workable management system from which companies can benefit.

The Code requires that:

- **All participants must be working with their regulators to secure full compliance**
This requirement has been carefully phrased to reflect the cycle of continual improvement which is expected of Code members. In addition, the wording recognises the fact that regulators generally have discretionary powers which lead to variations in the interpretation of full compliance. Evidence will be generated through an auditable paper trail associated with the relevant permits, conditions and associated improvement programmes.
- **All participants must have an environmental policy statement to which they adhere**
A policy can be defined as a statement by the organisation of its principles in relation to its overall environmental performance. The environmental policy statement should:
 - Be appropriate to the environmental impacts of the company's activities.
 - Include a commitment to continual improvement and the prevention of pollution.
 - Include a commitment to work with regulators to secure compliance with relevant environmental legislation and other requirements to which the organisation subscribes.

- Include a commitment to training for staff whose role could have an impact upon environmental performance; and
- Be documented, signed by a senior manager, reviewed on a regular basis and made publicly available.
- **All participants must have staff training and awareness programmes**
Site environmental management performance ultimately depends upon the day-to-day actions of members of staff. Therefore, the Code requires that all signatories have a system in place to identify and meet training and awareness requirements for staff at all levels.

3.4 Health and safety management

The management of health and safety is an important consideration in the wood recycling industry. Key issues include the control of site transport, machinery, manual handling, fire, dust and noise. The Code of Practice places two requirements upon sites in order to promote the systematic management of health and safety issues:

- **All participants must be working with their regulators to secure full compliance**
Health and safety legislation will typically not provide black and white definitions of 'full compliance'. Instead, companies are expected to interpret the concept of controlling risk as far as reasonably practical with regard to their particular operations. Furthermore, regulators' views of what constitutes full compliance will also vary. Therefore, Code members are required to work with their regulators on continual improvement towards full compliance.
- **All participants must have a health and safety policy statement to which they adhere**
The Code requires that all signatories have a health and safety policy statement in line with the requirements of the Health and Safety at Work etc Act 1974. This policy will outline the responsibilities for health and safety management as well as documenting the practical arrangements with regard to key issues.
- **All participants must have staff training and awareness programmes**
Site health and safety performance ultimately depends upon the day-to-day actions of members of staff. Therefore, the Code requires that all signatories have a system in place to identify and meet training and awareness requirements for staff at all levels.

3.5 Quality management

The Code focuses upon ensuring that members supply products which are fit for purpose. The Code requires that quality requirements for different products are agreed between wood recyclers and their customers. Wood recyclers must then demonstrate that they have appropriate systems in place to ensure that the customer receives product which meets the agreed standard:

- **All participants must have a written specification for their main products**
The specifications should be sufficiently detailed to satisfy customer needs. Since customer needs vary widely, no constraints are imposed by the Code of Practice.

- **All participants must have systems in place to ensure that they meet their quality specifications**

All companies have systems in place to ensure that a product is of the required quality. The Code requires members to document such systems, which might include elements such as:

- Supplier education, written specification and adoption of the Protocol on the verification of incoming material.
- Training for operatives to ensure the correct identification and removal of contaminants; or
- Sampling of the finished product to ensure that it is within the accepted ranges regarding moisture content, fines content, maximum particle size and colour.

3.6 Engagement with customers

The success of the wood recycling sector ultimately depends upon the ability to meet the needs and expectations of customers. To this end, the Code requires:

- **Clear and truthful marketing and advertising**
Participants must be able to justify claims made in marketing and advertising statements.
- **Supply of Code information**
Members of the Code of Practice are required to provide information on the Code to their customers to identify the standards which can be expected of Code members.

Appendix 1

Questions to ask your wood recycler

The following section provides a checklist for companies which are consigning wooden materials to a recycler. It provides a means of checking that you are using a responsible operation:

- Are you a member of the Wood Recycling Code of Practice Code?
- Can you provide a written specification of acceptable/non-acceptable material?
- Can you provide a written summary of the consequences of non-acceptable material?
- Are you a registered waste carrier?
- Do you provide transfer notes to all suppliers?
- Can you provide a copy of your waste carrier registration certificate?
- Do you comply with the requirements of the Protocol for the Verification of Wood Packaging Waste in the United Kingdom?
- Do you hold an environmental policy statement?
- Do you hold a health and safety policy statement?

Appendix 2

Questions to ask your recycled wood product supplier

The following section provides a checklist for companies that are buying recycled wood products. It provides a means of checking that you are using a responsible operation:

- Are you a member of the Wood Recycling Code of Practice Code?
- Can you supply a written specification for the products which you are supplying?
- What systems are in place to ensure that the finished product meets these quality specifications?
- Do you comply with the requirements of the Protocol for the Verification of Wood Packaging Waste in the United Kingdom?
- Do you hold an environmental policy statement?
- Do you hold a health and safety policy statement?

References

WRAP (2005) The Protocol for the Verification of Wood Packaging Waste in the United Kingdom.
www.wrap.org.uk

WRAP (2006) Wood recycling in the UK.
www.wrap.org.uk



www.woodrecyclers.org

The WRA is the wood recycling sector's trade association. It provides sector representation to Government and regulatory authorities, disseminates advice and guidance on subjects relevant to the sector and provides a forum for the exchange of information between members.

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