

## Waste Wood Classification – Check List for Demolition Waste Wood following introduction of RPS291 and RPS250 withdrawal

The introduction of RPS291 in November and withdrawal of Regulatory Position Statement 250 by the Environment Agency on 1<sup>st</sup> September in England and withdrawal of similar positions in Wales, Scotland and Northern Ireland means that structural timbers, wooden tiling battens and external joinery from **1950 -2007 buildings**, which could previously be sent for recycling or recovery under the RPS, will no longer be accepted at wood recycling sites unless they comply with the new RPS291 conditions of testing at least quarterly and their results being shared with the WRA. If you do this you will receive a WRA Submission Report. Under RPS291 you do not need to wait for your test results or store separately as amber items can be moved as non-hazardous.

We know from the work we've been doing over the past 5 years, 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 skip / waste management companies are refusing to take any waste wood or encouraging fly tipping or burning of wood, which could be used and recycled into panel board or biomass fuel. If you have any issues, please contact the WRA at [technical@woodrecyclers.org](mailto:technical@woodrecyclers.org)

### What do you need to do from 1<sup>st</sup> September with waste wood?

1. **Ask for background information on the property(properties)** – age of the wood items or building. You should **update your paperwork**, accordingly, particularly skip notes/delivery tickets, which should have a question relating to how old the building is & where the waste is coming from.
2. **Assess it** against the **WRA Waste Wood Assessment Guide** or your off taker's Acceptable Materials Schedule. It is a legal responsibility to assess waste before movement.
3. **Ideally, Local Authorities and Housing Associations should get the wood assessed & tested** against the Assessment Guide prior to any work being undertaken as part of their environmental impact assessment process. However, under RPS291 this is not compulsory.
4. If the waste wood is coming from a householder, the contractor or skip operator still needs to follow the **same rules as for commercial waste**.
5. Are you **still unsure** of the age, origin or type of wood – **then take a sample and get it tested**.
6. Send to be tested to any accredited lab but **always ask for the WRA02 test otherwise you will pay more, and your results won't be included** in the project to reduce the list of items. [See here for a list of WRA Member laboratories](#).
7. **Only sample 1 of each wood type per job/project is required quarterly**. Multiple tests are not needed of the same wood type, if the wood was all installed or treated at the same time. Different items from the same job/project can be tested.
8. Always take the sample in accordance with the **WRA Quick sample guide** overleaf and make sure it doesn't have known hazardous treatments on it such as creosote or is heavily contaminated with something like bitumen. These items will already be excluded from your wood processor's Acceptable Materials Guide. Also, please remove paint from samples before sending them off for testing.
9. Potentially hazardous waste wood can be stored, moved, and processed as non-hazardous under the RPS. However, known hazardous waste wood such as telegraph poles and railway sleepers must be sent to a specific Haz waste facility.
10. Make sure you allow the testing facility to **share your raw results** with the WRA to ensure that you receive a Submission Report which is your proof of compliance. You do not need a hazardous or non-hazardous analysis report under RPS291.
11. Tests should take no longer than **7 – 14 days** depending on the lab. Remember, you do not need to wait for the test results under RPS291, as potentially hazardous items can still move as non-haz if you can prove that you are testing quarterly and have a WRA Submission Report to prove it.
12. The **producer of the waste should pay for the test** unless they are a domestic householder, then it's the skip operator or contractor.
13. **Update policies and procedures** to demonstrate that you and your staff understand what items they are looking for, how to get them tested if found and what to do next. It is vital to show understanding even though **these items are not always easy to find**.
14. **The WRA has a full suite of resources available** including a full set of Frequently Asked Questions, a toolkit, a printable visual assessment guide and training videos to help with this transition so please visit: [www.woodrecyclers.org](http://www.woodrecyclers.org) Your wood recycler and/or waste management company/skip operator can also provide advice if you have specific questions.

### What are the 10 items from 1950 -2007 buildings?

The 10 items which are potentially hazardous are: **Barge boards, facias, 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) are only potentially hazardous if they are softwood and from **buildings constructed before 1996**. **See WRA Quick Guide for more information**. Please do not send items that have obviously been treated with creosote or painted wood. We are testing for non-visible treatments.

**INSTRUCTIONS FOR WASTE WOOD CLASSIFICATION TESTING & SAMPLE COLLECTION**

1. Please ensure that the samples taken are from whole pieces of the items identified overleaf and are not painted or from known hazardous items such as those treated with creosote. Then take a cross section from the middle - no smaller than 150mm long (at least 200 grammes) - which should be sent to the lab and tested using the WRA02 suite. Please only take one sample of each item. Details of WRA member laboratories can be found on the WRA website.
2. Safety equipment worn to collect the samples must be clean and free from any sources of hydrocarbon or metal contamination. Where suspected creosote posts have been handled, new gloves should be worn for subsequent samples. Cross contamination of samples must be avoided.
3. Any sample preparation equipment must also be cleaned between each item.
4. 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 this form with the completed information inside the packaging.
5. **DO NOT send in samples that have obviously been treated with creosote, as these should be rejected as hazardous in accordance with the WRA Waste Wood Assessment Guide and sent for suitable hazardous disposal.**

Please complete the information below and put this sheet in with the sample so that you receive your WRA Submission Report:

Company Name: .....

Site Name: .....

Postcode: .....

Contact Name: .....

Email: .....

Sample Type (use new form for each different wood type):

Wood Type	Approx. Age of Building	Enclosed Sample (tick as appropriate)	Sample Source - Householder, Transfer Station, Construction or Other (please specify)	EWC Code (tick as appropriate)		
				17 02 04*	19 12 06*	20 01 37*

The items below are only relevant if from pre-2007 buildings

Barge Boards						
External Fascia						
Soffit Boards						
External Joinery						
External Door						
Roof Timber						
Tiling Cladding						
Tiling Battens						
Timber Frames						
Timber Joists						

Test Required (please tick):

WRA02 - C&D Sourced:  
.....

WRA02 - Householder Sourced:  
.....

Sample Unique Reference Number:

.....

(To be provided by person sending sample to chosen laboratory and same unique reference number to be used on required Chain of Custody Form for that laboratory.)

Completing this request form means you give permission for your results to be shared with the WRA either directly by your lab or via the Hazardous Waste Online platform. The only information shared will be the test result, the wood type and the geographic location to allow the WRA to satisfy the EA's testing criteria. No specific company information will be identifiable. Please sign below to confirm this and to receive your WRA Submission Report:

Name:  
.....

Signature:  
.....

Date:  
.....

Any results obtained using WRA02 are specifically for this piece of work and cannot be relied upon for any other purpose. If you have any queries at all, please do not hesitate to contact 0330 325 0490 or [technical@woodrecyclers.org](mailto:technical@woodrecyclers.org)

