



Autumn 2021 Members' Meeting

Agenda

08.15 – 08.20 am

Welcome and Introduction

Richard Coulson, WRA Chair

08.20 – 08.35 am

Update from the Board

- WRA 21st Anniversary Celebrations
- Carbon Footprint

Richard Coulson

08.35 - 08.50 am

WRA Activity update

Julia Turner and Gayle Whittaker, WRA

08.50 – 09.10 am

WRA Technical Update

Vicki Hughes, WRA Technical Lead and Enva Wood Recycling

09.10 – 09.25 am

Feedback from Members and Q&A with the Panel

Richard Coulson, Vicki Hughes and Julia Turner

09.25 – 09.30 am

Dates of Future Meetings, AOB and Close

Board Update

Richard Coulson
WRA Chair and RWE

Board Update

Agenda:

- 1.00 pm – 1.30 pm Arrival and Refreshments Lunch Available
- 1.30 pm – 1.35 pm Welcome and Introductions - Richard
- 1.35 pm – 1.50 pm Previous Minutes and Matters Arising – All
- 1.50 pm – 2.10 pm Market Review
 - Waste Wood/Panel Board/Biomass/Animal Bedding
- 2.10 pm – 2.30 pm Service Member Review - Paul & Gayle
- 2.30 pm – 2.40 pm Cashflow Forecast, Quarterly mgt reports and latest debtors – Julia
 - Discussion on budget for 2022 – Likely expenditure in WWC Testing, Dust work, CSR Strategy and 21st Anniversary Celebrations
- 2.40 pm – 2.55 pm Update Exec Director Activity and Priorities, including membership update and review of stakeholder matrix (by exception) – Julia
- 2.55 pm – 3.10 pm Communications Update (by exception) – Gayle
- 3.10 pm – 3.30 pm Comfort Break
- 3.30 pm – 4.30 pm Technical Committee Update – Vicki and Richard
 - Waste Wood Classification
 - Appropriate Measures Guidance
 - BSL-RHI
 - Health and Safety Work/Dust
 - Additional technical support requirements for the Board
- 4.30 pm – 4.45 pm Dates/locations of Future Meetings – All
 - Tuesday 14th and Wednesday 15th December – Telford
 - Set Dates for 2022
 - WRA 21st Birthday celebrations
- 4.45 pm – 5.00 pm Any Other Business and close of meeting
 - CSR Strategy
 - AH Chair of SIA

Board Update

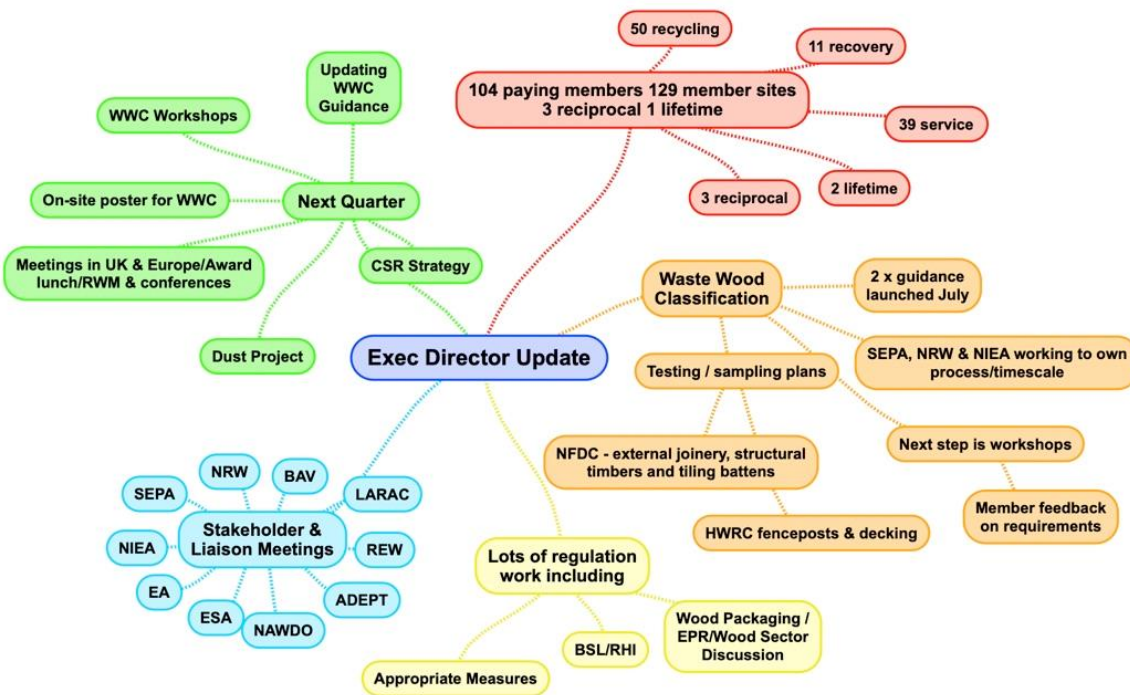
Financials:

- Debtors excellent – thank you!
- Forecasting additional £25 k surplus for the year to add to £77K reserves
- Reserves high as no face-to-face meetings for 18 months and delayed WWC Testing/Other Technical work
- Business Plan/Budget review for 2022
- Additional WWC and technical work to come/21st anniversary/potential carbon footprint work
- Cashflow and year-to-date management reports available

WRA Activity Update

Julia Turner and Gayle Whittaker
ED WRA and WRA PR and Communications Lead

WRA Activity Update – ED



WRA Activity Update – Communications



Technical Update

Vicki Hughes

WRA Board Technical Lead and Enva Wood Recycling

Update from the EA

- Now monitoring how WWC and new RPSs working on the ground – Feedback to follow
- Working with us to agree future Sampling/Testing Plan
- About to publish response to Exemption Consultation and transitional requirements
- ‘Misdescription of waste’ Project – Major focus on C&D sector

Update on the Non-Domestic RHI scheme

15 September 2021

New requirements coming into force in 2022

A new annual maintenance check for all biomass boilers from the 1st April 2022:

- Biomass boilers on the NDRHI scheme must carry out annual maintenance checks.
- The checks must be carried out in accordance with the new MCS standard (published in June 2021) and accredited by HETAS.
- It will be an ongoing obligation and Ofgem will have the power to withhold or reduce RHI payments if there is a failure to comply.

A new fuel quality standard for all woodfuel used in biomass boilers from the 1st April 2022:

- All fuel used in biomass boilers on the NDRHI scheme have to comply with this requirement.
- All fuel on the Biomass Suppliers List (BSL) will be compliant with this obligation. This should reduce the impact for participants who source their fuel from the BSL.
- Ofgem will have the power to withhold or reduce RHI payments if there is a failure to comply.

Other changes

Equivalent schemes for fuel quality/maintenance checks:

- BEIS will assess equivalent standards/accreditation schemes and where approved, this could be used instead of the default standards.
- The burden on proving equivalence will be with the participant, this includes the cost of assessing the standard/accreditation.

New BSL Administrator since July 2021:

- BEIS have appointed Woodsure to run the BSL scheme on behalf of BEIS after successfully winning the tender.

BSL Advisory Panel (elections) end of 2021:

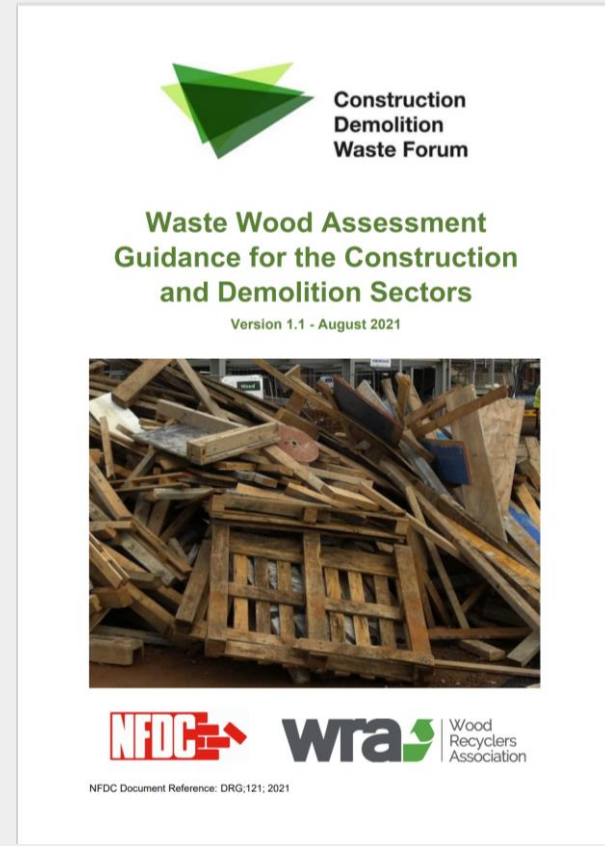
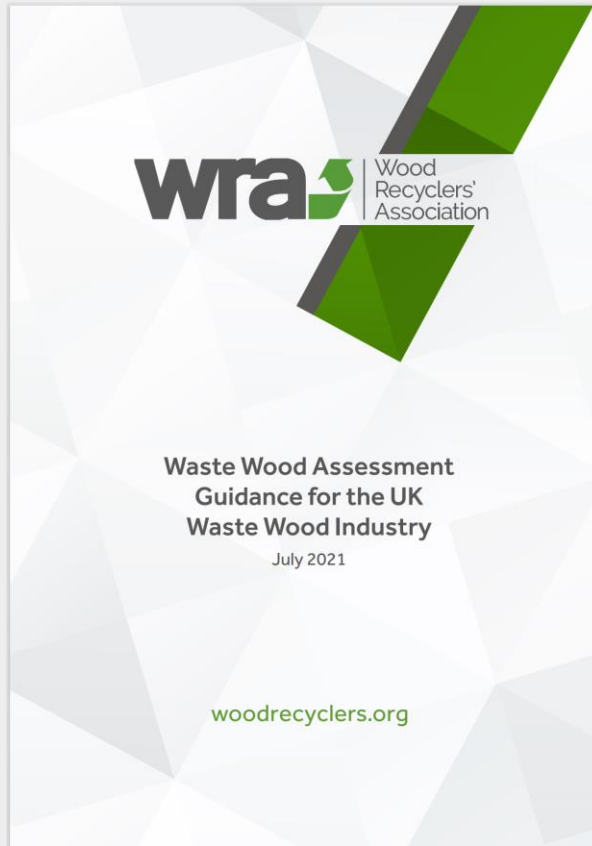
- The BSL advisory panel provide recommendations to BEIS mainly on biomass policy.
- Membership is elected from various representative categories. The current membership has lapsed.
- There will be an election for new Advisory Panel members in the Q4 of this year. If you are interested please contact Woodsure via bslhelpdesk@woodsurre.co.uk

Questions

Contact tunde.Ojetola@beis.gov.uk with any questions about these topics

Guidance Launched

- Two new RPSs in England
- Scotland – Own position statement and confirmation that only Grade A for animal bedding
- Wales – Extended RPS207 and may follow SEPA position
- Northern Ireland – no decision yet



wra Grades of Waste Wood

The WRA supports the waste hierarchy of reuse, recycle, reprocess. However, the source and type of waste wood dictates the appropriate end destination. The following chart shows the WRA grading system and which grades are clean/untreated, treated but non-hazardous and treated and hazardous. It is aimed at providing guidance to those working with waste wood in the UK.

Grade	Typical Markets	Typical Sources of raw material for recycling and/or recovery	Typical Materials	Typical non-wood content prior to processing	Notes
Grade A Pre-Consumer Waste Wood ("") and untreated wooden packaging = Clean un-treated	A feedstock for the manufacture of professional and consumer products such as animal bedding, equine and landscaping surfacing. May also be used as a fuel in domestic and non-IED Chapter IV biomass installations and for the manufacture of pellets and briquettes.	Wood Product Manufacturing, Distribution, Retailing, Packaging and Secondary manufacture, e.g. joinery and pallet reclamation.	Solid softwood and hardwood. Packaging waste, scrap pallets, packing cases and cable drums. Process off-cuts from the manufacture of virgin/sawn timber and untreated board products.	Nails and metal fixings. Minor amounts of non-hazardous surface coatings, such as water-soluble paint.	This is a waste as defined by the waste regulations. Does not require an IED Chapter IV installation and should not contain any treated or low-grade material.
Grade B Business waste wood = Treated Non-hazardous	This is the preferred feedstock for industrial wood processing operations such as the manufacture of panel board products. Can also be used for IED Chapter IV biomass.	As Grade A, plus construction and demolition operations, skip operators, transfer stations.	May contain Grade A material as above plus building and demolition materials and domestic furniture made from solid wood.	Nails and metal fixings. Some paints, plastics, glass, grit, non-hazardous coatings, binders and glues. Limits on treated or coated materials as defined by end users and IED.	This is mostly solid wood. Some feedstock specifications contain a 5% to 10% limit on former panel products such as chipboard, MDF and plywood. Is a waste for the requirements of Waste Management Regulations. Will require an IED Chapter IV compliant installation for biomass.
Grade C Municipal waste wood = Treated Non-hazardous	For use in the IED Chapter IV biomass installations and for panel board in controlled volumes.	All above plus municipal collections, transfer stations and HWRCs.	All of the above plus flat pack furniture made from board products and DIY materials.	Nails and metal fixings. Paints, coatings and glues, paper, plastics and rubber, glass, grit. Coated and treated timber (non CCA or creosote).	This is mostly board products. Mainly suitable for IED Chapter IV compliant biomass installations, but also suitable for panel board manufacture with correct processing and blending. Is a waste for Waste Management Regulations.
Grade D Hazardous waste wood = Treated hazardous	Requires disposal at facilities licensed to accept hazardous waste.	Waste wood from hydraulic engineering, such as wood from docks. Waste wood from industrial applications such as cooling tower timbers, woodblock flooring or moulds. Waste wood from boats, carriages and trailer beds. Waste wood treated with CCA or creosote.	Agricultural fencing, telegraph poles, railway sleepers.	Copper chrome arsenic (CCA) preservation treatments and creosote.	These materials must be segregated and consigned as hazardous to sites permitted to accept hazardous wood.

Clean/untreated waste wood is suitable for processing into animal bedding, panel board feedstock, landscaping or equestrian surfaces and biomass. Treated, but non-hazardous waste wood is suitable for processing as a feedstock for panel board or energy recovery in a Chapter IV compliant facility. Hazardous waste wood can only be disposed of in a facility licensed for this purpose.

¹ Pre-consumer waste wood is waste wood material created during the manufacturing process of virgin wood, not involving the application of treatments, e.g. offcuts or trimmings from virgin/sawn timber. It is also waste wood material created during the manufacturing process of raw, untreated board products such as panel board, MDF and plywood (for clarity, this waste wood can only be used/burnt at source). Waste from joinery activity using these untreated wood materials is also included in this definition.

Source: The Wood Recyclers' Association July 2021

WRA Grading System

- Confirms what kind of waste wood is suitable for specific end markets
- Outlines typical sources

FAQs

- What can/can't move under new RPSs
- Paperwork - CWTNs/HCNs
- Permits
- % potentially haz waste wood in a load
- And Lots more

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 (HWRCCs) 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 RPS250 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 this 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 recycler 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.

Waste Wood Classification Frequently Asked Questions

To download a copy of the Waste Wood Assessment Guidance Guide visit www.woodrecyclers.org



Updates to go into FAQs

- Confirmation from EA that 19 codes to be added to RPS250 - already actioned
- HWCN should have worst case scenario listed on chemical components
- Incorrectly recorded percentages – have to follow formal rejection procedure
- Local Authority EA Team being asked how this is recorded on waste data flow forms
- CWTN wording – no need to refer to RPSs

WWC – What next?

- Feedback from NRW, SEPA and NIEA – regulatory divergence?
- Updating of Guidance/FAQs - do we need printed copies?
- Workshops
- Poster for sites
- On-going stakeholder engagement
- Develop Sampling/Testing Plans for both household and C&D items



What's on the Horizon

- Environment Bill/ Resources and Waste Strategy
 - Extended Producer Responsibility/Modulated Fees
 - Packaging Recycling Targets/PRNs
 - Electronic Waste Tracking
 - Plant Efficiency
- WRA and Waste Wood Sector Carbon Footprint
 - Supporting the Waste Hierarchy
 - Targeting Net Zero
- Regulation
 - Dust Best Practice

Feedback/Q&A Session

WRA Members' Meetings for 2021/22

Winter – Wednesday 15th December – Telford

Spring 2022 – Wednesday 9th March – Venue TBC

Summer 2022 – 23rd June – potential 21st Anniversary Celebrations

Autumn 2022 – possibly 15th September TBC

Winter 2022 – 7th December



Thank you!

See us at Let's Recycle Live on Stand AA4

<http://www.woodrecyclers.org/>



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