

BRIEFING ON LATEST POSITION FOR CLASSIFYING WASTE WOOD FROM MIXED WASTE WOOD SOURCES

On Tuesday November 28th, the Environment Agency (EA) issued a Regulatory Position Statement (RPS) concerning the classification of waste wood from mixed waste wood sources.

See <https://www.gov.uk/government/publications/classifying-waste-wood-from-mixed-waste-wood-sources-rps-207>

The RPS requires any operator handling mixed waste wood to review their procedures in line with its content.

What's in the RPS?

The RPS states that:

- Clearly identifiable clean untreated waste wood is only suitable for animal bedding or non-WID boilers
- Mixed waste wood must only go to Chapter IV IED compliant boilers or panel board manufacturing
- A precautionary hazardous waste classification and associated consignment requirement must be applied to mixed waste wood loads in any other situation.

Waste wood currently recognised as hazardous, such as railway sleepers, telegraph poles and wood treated with creosote must continue to be segregated as hazardous waste wood and consigned as hazardous to appropriate facilities.

This means that if you are going to process mixed waste wood, including fines, for any other purpose, then you will need to assess and classify it in line with the WM3 Hazardous Waste Technical Guidance. See <https://www.gov.uk/government/publications/waste-classification-technical-guidance>

The RPS will remain in place until November 2018 during which time the Waste Wood Classification Group, led by the WRA, will carry out further waste analysis and assessment to shape what happens in the future. We will also be writing the first phase of a Code of Practice, which will lay out strict guidance for how mixed waste wood should be assessed and handled at all stages of the waste wood supply chain.

Why has the EA published the RPS?

The publication of this RPS follows concerns raised in the UK about whether treated waste wood was being mis-described as untreated, clean grade A material and was ending up in non IED Chapter IV-compliant boilers.

The EA asked the WRA to lead a waste wood industry group including waste management companies, manufacturers, other trade associations, local authority representatives and representation from the EA's technical team, to come up with a solution to ensure that:

- Waste wood is properly classified at the front-end
- The people who process the wood further check and maintain that classification
- Those taking the processed wood ensure they use suitable wood for particular end uses

As a result of the work we have done with the EA already, the RPS has been developed to continue to allow mixed waste wood to be coded and moved under a non-hazardous waste code as long as it only goes to two end uses - panel board and Chapter IV IED compliant boilers. **Without this we could have been left with a situation where all mixed waste wood had to be coded as hazardous unless it could be proved otherwise through testing.**

What you need to do

As outlined above, if you can comply with the conditions in the RPS of only supplying mixed waste wood for IED Chapter IV compliant boilers or panel board, then you do not need to apply a hazardous waste classification for waste wood from mixed waste wood sources.

If, however, you do supply for other end uses, including sending fines for use in land restoration, then you will need to assess and classify in line with WM3 Technical Guidance.

For **fines**, the EA perceive that both animal bedding (currently permitted in Scotland, though not in England and Wales) and land restoration in the UK are potentially high-risk applications for treated waste wood fines compared to the low-risk applications of IED Chapter IV compliant biomass and panel board.

They have therefore asked us to ask you to:

- Reduce the amount of fines you create wherever possible
- Manage those fines in accordance with the RPS
- If this is not possible, then let me (Julia Turner) know what you are proposing to do with your fines and what permits and testing do you have in place to make this as low-risk as possible

Clearly, the EA do not want to see piles of wood fines which have no disposal route, so they have asked the WRA to look at options within IED Chapter IV biomass and to put forward the low-risk options highlighted above over the next few weeks. This may lead to a revision of the RPS or the issuing of another RPS specific to mixed waste wood fines.

In the interim, we have asked the EA to brief their officers to manage the roll out of the RPS pragmatically.

Please familiarise yourself with the [WM 3 Technical Guidance](#).

Testing in line with WM3

At the moment, we are working hard to agree a sampling and testing protocol that may be suitable for mixed waste wood at the front end and we should be in a position early next year to give you some guidance on this. In the interim, if you are testing output material you will need to use the guidelines in WM3 together with specifications from your end user.

Who can help with the Testing?

We have a number of members who operate testing laboratories. They are Knight Energy Services, SGS UK Ltd and Socotec. See [here](#) for contact details. [Marchwood](#) and [Wrc](#) will also be able to help with this.

Questions

If you have any concerns or questions relating to this RPS, please contact me (Julia Turner) on 0330 325 0490 or 07903 251287 or email me at julia.turner@woodrecyclers.org and I will liaise directly with our Wood Sector Lead at the Environment Agency, Howard Leberman.