Hazardous Wood Waste Review of Classification by the EA

Background

The Environment Agency have raised concerns with the classification of wood waste following representations in relation to the Renewable Heat Incentive (RHI) about non WID compliant boilers receiving mixed wood waste fuel, rather than purely Grade A wood (for wood gradings, please see Wood Recycler's Association Wood Gradings in Annex A or visit www.woodrecyclers.org). In addition, the EA are looking to introduce new EU guidance under the WM3 rules which will be applied within the next 12 months. This could mean that mixed wood waste loads could be classified as hazardous unless front end assessment processes that are approved by the EA are applied and adhered to at all wood processors, including skip companies, wood processors and Civic Amenity sites. The EA's objectives are:-

- **Waste wood should be properly classified at front end handling/processing during all 'steps' of the supply chain**
- **Organisations handling, processing or receiving the waste wood must ensure they maintain the classification**
- **Wood handlers/processors need to ensure that the wood outputs are treated/used in appropriate end markets**

Current situation and next steps

The EA have selected Waste Wood as the first material to be reviewed and have engaged with the Wood Recyclers Association (WRA) to lead the Wood sector response but ultimately, this has the potential to be an industry wide issue applied to all waste materials e.g. a treated fence panel deposited in green waste at a Civic Amenity site could then lead to the whole load being classified as hazardous and therefore only being sent to an approved form of hazardous waste treatment such as hazardous landfill. The implications are clearly significant in terms of additional handling, disposal and operational costs to ensure compliance, along with the impact on reduced recycling rates

The WRA have fully engaged with the EA and NRW and, after several discussions, have agreed to set up a small joint working party to take the following next steps with the EA:-

- **Review the description of Grade D (hazardous wood) to ensure transparency and clarity**
- **PAS111 should be reviewed and updated**
- **Ensure UK Waste Wood data is as robust as possible**
- **Define and agree what is an acceptable *de minimis* level of Grade D wood**
- **Identify what is best practice in terms of front-end assessment of Waste Wood and management of mirror entry codes**

- **Review of whether a new regulatory positioning statement could be produced to accommodate the compromise in approach to WM3 and processing of Grade D wood, depending on the outcomes of the previous steps**
- **Development of a *Code of Practice* to encompass all actors in the wood sector, including Municipalities, waste management companies, skip operators, wood processors and end users (PanelBoard and EfW/CHP)**

As part of the review process, the WRA has engaged with and is leading on behalf of other industry associations. They will provide regular updates as the situation develops but we feel that it would be worth galvanising industry responses from all stakeholders at an early stage, in order to ensure the EA fully appreciates the potential impact of their course of action.

Annex A (informative) Grades of recycled wood

Grade	Typical markets	Typical sources of raw material for recycling	Typical materials	Typical non – wood content prior to processing	Notes
Grade A "Clean" recycled wood	A feedstock for the manufacture of professional and consumer products such as animal bedding and horticultural mulches. May also be used as fuel for renewable energy generation in non-WID installations, and for the manufacture of pellets and briquettes.	Distribution. Retailing. Packaging. Secondary manufacture, e.g. joinery. Pallet reclamation.	Solid softwood and hardwood. Packaging waste, scrap pallets, packing cases, and cable drums. Process off-cuts from the manufacture of untreated products.	Nails and metal fixings. Minor amounts of paint, and surface coatings.	Some visible particles of coatings and light plastics will remain. Is a waste for the requirements of Waste Management Regulations. Does not require a WID installation. Should not contain lower grade material.
Grade B Industrial feedstock	A feedstock for industrial wood processing operations, such as the manufacture of panel products, including chipboard and medium density fibreboard.	As Grade A, plus construction and demolition operations transfer stations.	May contain up to 60% 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, coatings, binders and glues. Limits on treated or coated materials as defined by WID.	The Grade A content is not only costly and difficult to separate, it is essential to maintain the quality of feedstock for chipboard manufacture, and for PRN revenues. Some feedstock specifications contain a 5% to 10% limit on former panel products such as chipboard, MDF and plywood. Should not contain lower grade material. Is a waste for the requirements of Waste Management Regulations. May require a WID installation, unless the operator of the biomass energy plant can demonstrate to the Regulator adequate quality controls in the supply chain to ensure no Grade C material is included.
Grade C Fuel	Biomass fuel for use in the generation of electricity and/or heat in WID compliant installations.	All above, plus municipal collections, recycling centres transfer stations and civic amenity recycling sites.	All of the above plus fencing products, flat pack furniture made from board products and DIY materials. High content of panel products such as chipboard, MDF, plywood, OSB and fibreboard.	Nails and metal fixings. Paints coatings and glues, paper, plastics and rubber, glass, grit. Coated and treated timber (non CCA or creosote).	Suitable only For WID installations. Material coated and treated with preservatives as defined by WID may be included. Should not contain lower grade material. Is a waste for the requirements of Waste Management Regulations.
Grade D Hazardous waste	Requires disposal at facilities licensed to accept hazardous waste.	All of the above plus fencing, track work and transmission pole contractors.	Fencing, transmission poles, railway sleepers, cooling towers.	Copper / chrome / arsenic (CCA) preservation treatments and creosote.	Is a waste for the requirements of Waste Management Regulations. Requires disposal in a process regulated as a hazardous waste incinerator.

Source: Derived from Wood Recyclers' Association