

# UK Guidance on the Classification of Treated Wood Waste

## Introduction

Over 4 million tonnes of wood waste is collected and processed by the waste industry every year with the majority destined for biomass energy generation followed by panel board manufacture, animal bedding, reuse and other recycling.

The Wood Recyclers' Association (WRA) has developed a new Waste Wood Classification scheme which will help ensure that:

1. Waste wood is correctly classified at its origin
2. Waste wood is not mis-described and is processed into appropriate end uses
3. There is a clear understanding of which items of waste wood are hazardous

## Waste wood classification

The WRA has classified waste wood into four grades depending on the origin and content.

Table 1. WRA Classification of waste wood

WRA Grade	Description	Typical sources	Typical non-wood content
A	Clean untreated wood and board products <i>Clean un-treated</i>	Wood product manufacturing and packaging	Nails, metal fixings and small quantities of non-hazardous water based coatings.
B	Business waste wood <i>Treated non-hazardous</i>	Construction, demolition and skip operations.	As Grade A plus some paints, glass, grit and glues. Limits on treated or coated materials.
C	Municipal waste wood <i>Treated non-hazardous</i>	Municipal collections, transfer stations and HWRCs.	As Grade A plus some glues, paper, glass and grit. Coated and treated timber (non copper chrome arsenic (CCA) or creosote).
D	Hazardous waste wood <i>Treated hazardous</i>	Agricultural fencing, industrial applications, telegraph poles and railway sleepers. CCA or creosote treated. Any items listed as 'potentially hazardous' on the WRA guidance, must be segregated and tested to prove that they are 'non-hazardous'. Otherwise these items are categorised as Grade D.	As above plus CCA and creosote preservative treatments. 'Potentially hazardous' waste wood items are: barge boards; external fascias; soffit boards; external joinery (wooden windows and conservatories); external doors; roof timbers; tiling and cladding battens; timber frames and joists from pre-2007 buildings.

REF: [WRA Grades of Waste Wood](#)

## Classification of waste preservative treated wood

Whether preservative treated wood is classified as hazardous or non-hazardous depends on the treatment that was used and is assessed in accordance with the UK government [Technical Guidance WM3](#), (Guidance on the classification and assessment of waste). Essentially, wood treated with CCA, creosote, PCP, TBTO, Lindane or Dieldrin is classified as hazardous. Wood treated with ingredients currently in use in the UK such as copper, triazoles, boron, quaternary ammonium compounds and permethrin is classified as non-hazardous, according to a WM3 assessment.

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Without laboratory testing and chemical analysis, it is not an easy task to establish what type of treatment may be contained in waste wood. The WRA guidance therefore relies on assessment criteria, developed by the WPA, on the likely chemical composition of waste wood:

1. **The type and composition of preservative treatments that have been used since 1950**
2. **The end use of the treated timber based on Use Class**
3. **The likely preservative treatments that would have been used during a given time period and Use Class will provide a good indication as to whether the wood will be considered hazardous or not**

The table below can be used to make a judgement on whether waste wood may be assessed as hazardous.

Table 2. Assessment of waste wood by formulation type, Use Class and year of construction

Year of construction	Internal UC2	External (coated) UC3	External (uncoated/in ground) UC3 & UC4
1950 - 1977	Known hazardous waste stream (CCA, creosote, TBTO, Lindane, Dieldrin etc)	Known hazardous waste stream (CCA, creosote, TBTO, Lindane, Dieldrin etc)	Known hazardous waste stream (CCA, creosote, TBTO, Lindane, Dieldrin etc)
1978 - 1992	Known hazardous waste stream (CCA, creosote, TBTO, Lindane, Dieldrin etc)	Known hazardous waste stream (CCA, creosote, TBTO, Lindane, Dieldrin etc)	Known hazardous waste stream (CCA, creosote, TBTO, Lindane, Dieldrin etc)
1993 - 1995	No WM3 assessment available (TBTN)	No WM3 assessment available (TBTN)	Known hazardous waste stream (CCA, creosote, TBTO, Lindane, Dieldrin etc)
1996	WM3 model assessment shows as non-hazardous (Cu organics, permethrin, triazoles etc)	WM3 model assessment shows as non-hazardous (Cu organics, permethrin, triazoles etc)	Known hazardous waste stream (CCA, creosote, TBTO, Lindane, Dieldrin etc)
1997 - 2001	WM3 model assessment shows as non-hazardous (Cu organics, permethrin, triazoles etc)	WM3 model assessment shows as non-hazardous (Cu organics, permethrin, triazoles etc)	Known hazardous waste stream (CCA, creosote, TBTO, Lindane, Dieldrin etc)
2002	WM3 model assessment shows as non-hazardous (Cu organics, permethrin, triazoles etc)	WM3 model assessment shows as non-hazardous (Cu organics, permethrin, triazoles etc)	Known hazardous waste stream (CCA, creosote, TBTO, Lindane, Dieldrin etc)
2003 - 2007	WM3 model assessment shows as non-hazardous (Cu organics, permethrin, triazoles etc)	WM3 model assessment shows as non-hazardous (Cu organics, permethrin, triazoles etc)	Known hazardous waste stream (CCA, creosote, TBTO, Lindane, Dieldrin etc)
2008 - 2015	WM3 model assessment shows as non-hazardous (Cu organics, permethrin, triazoles etc)	WM3 model assessment shows as non-hazardous (Cu organics, permethrin, triazoles etc)	Known hazardous waste stream (CCA, creosote, TBTO, Lindane, Dieldrin etc)
2016 - present	WM3 model assessment shows as non-hazardous (Cu organics, permethrin, triazoles etc)	WM3 model assessment shows as non-hazardous (Cu organics, permethrin, triazoles etc)	Known hazardous waste stream (CCA, creosote, TBTO, Lindane, Dieldrin etc)

## Removal of RPS 250 from 1 September 2023

The Environment Agency (EA) Regulatory Position Statement (RPS 250) allowed potentially hazardous waste wood and non-hazardous waste wood to be received at Waste Transfer Stations, processed and sent mixed for recovery.

From 1 September 2023, RPS 250 has been withdrawn and now potentially hazardous waste wood will be deemed hazardous unless shown otherwise through testing. The EA has identified 10 items from pre-2007 buildings that are considered to be potentially hazardous; **Barge boards, fascias, soffits, wooden windows, conservatories and doors, roofing timbers, tiling/cladding battens and timber frames/joists.**

The WRA can help recyclers with testing of these items to determine whether they are hazardous or not.

## Industry guidance

Industry guidance has been produced based on the results and findings of the study into waste wood. There are two separate guides; one for the [construction and demolition](#) sector and one for the [wood recycling industry](#). Both documents detail specific end use applications and the potential for hazardous wood waste.

The WPA will continue to work with WRA and others to further understand and quantify hazardous elements in the waste wood streams and ensure that waste wood is appropriately recycled and processed.

Further information is available from the [WRA website](#).

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