

Guidance on the use of waste wood

Description

14 June 2013

The Environment Agency is aware that treated dirty waste wood is being processed for use as animal bedding and have been working with the waste wood recycling sector to raise awareness of this issue and clarify what action is necessary.

By doing this we seek to ensure consistent regulation and to reduce risk to livestock from contaminated bedding and any subsequent contamination of land.

Since the Environmental Permitting Regulations in 2010, sites taking shredded waste wood for use must have a registered U8 exemption. This exemption must be registered with the Environment Agency before any waste wood can be imported to the site for use as animal bedding or for horse ménages.

The U8 exemption only allows for untreated shredded waste wood (Grade A) to be used (with a maximum quantity of 1000 tonnes for horse ménages and 100 tonnes for animal bedding). What has been found is that contaminated treated waste wood (Grades B and C) has been shredded and marketed for animal bedding thus increasing risk to livestock and the environment.

The wood recycling industry recognises and highlights that “Quality of animal bedding is absolutely key”.

Waste wood from Material Recovery Facilities (MRF), Civic Amenity (CA) or construction and demolition sources are unlikely to be of sufficient quality (Grade A) to be used as animal bedding, horse ménages or for composting.

Further information on grade A waste wood can be found in Annex A of PAS 111:2012. Sources of Grade A ‘clean’ waste wood most

commonly include packaging waste, pallets and process off-cuts from the manufacture of products made from untreated timber.

As most registered U8 exemptions are likely to be on agricultural premises, farmers using shredded waste wood for these purposes must ensure that they have registered a U8 exemption as this material remains a waste.

To minimise risks to livestock and land, farmers are advised that they should

- ensure that the shredded wood bedding is of good quality,
- is free from contamination,
- does not contain treated wood and
- should source this material from a reputable dealer.

If bedding is from contaminated wood sources then farmers may well also experience subsequent problems in disposing of or recovering used animal bedding.

Suppliers of shredded waste wood for use as animal bedding or horse ménages must realise that the material remains waste. Therefore suppliers and those accepting such waste, must ensure that they comply with their duty of care obligations.

The Environment Agency may take appropriate enforcement action where we find anyone shredding waste wood or accepting shredded waste wood for use, without the required registered exemption (T6 or U8 respectively) or appropriate permit. We may also take enforcement action where we find that contaminated shredded waste wood has been supplied for use or used for such purposes.

The Environment Agency are however, aware that untreated and clean Grade A waste wood is currently shredded to produce bagged small animal and poultry bedding for retail or in bulk to wholesale markets. We are satisfied at present that where this shredded waste wood is produced to a high specification and that retailers or wholesalers have carried out their own risk assessment before selling this material, although it remains a waste produced from a

waste treatment process, we will not take enforcement action unless risks to the environment or human health result.

We are working with the wood recycling sector to find an appropriate long term regulatory approach for the continued use of high quality animal bedding from clean shredded waste wood.

We also seek here to clarify how animal bedding once it has been used and is to be discarded, should be managed. There are a range of registerable exemptions covering subsequent uses and these are listed below. Some of these exemptions will apply when they are carried out on a farm so we wish to explain what these are.

Clean waste wood which has been used for animal bedding in accordance with a U8 exemption (i.e. it must be untreated wood) when discarded (it is fully biodegradable animal bedding) may then either be;

- composted under a registered exemption T23 (up to 80t in total, at the place of production or up to 60t elsewhere) or
- treated under registered exemption T24 agricultural anaerobic digestion (up to 1,250 m³) or
- T25 non-agricultural anaerobic digestion (up to 50 m³)

The treated waste from these activities (compost or digestate) may then be spread to land in accordance with;

- exemption U10 – spreading waste on agricultural land to confer benefit or
- exemption U11 – spreading waste on non-agricultural land to confer benefit.

All exemptions must be registered with the Environment Agency before these spreading operations take place. The quantity limits are total limits and will include any other wastes treated in these operations.

Alan Holmes