

WPIF response to Scottish Government Consultation: *Implementing Scotland's Zero Waste Plan*

Q1. Are there any other materials or waste streams which should be included in these requirements to sort and separately collect?

The Scottish Government should include wood in the list of proposed “key recyclable materials”. Several industries, including wood panels and animal bedding, make excellent use of recycled wood fibre, thus reducing the impact on the virgin resource. We welcome the Government’s recognition that contaminated/treated wood has distinct properties in terms of waste management. Therefore, it would make sense to require waste wood to be sorted and collected separately in two categories: treated and untreated wood.

There is considerable demand in Scotland (and across the UK) for recovered untreated wood fibre. As the recent WRAP study confirmed, the total waste wood resource is smaller than was previously estimated (approximately 4m tonnes p.a. rather than 10m tonnes). It is important to recover as much wood as possible for recycling and, where appropriate, for energy recovery.

If the Scottish Government is to achieve its goal of directing only non-recyclable wood to EfW, the requirement to sort and separately collect is essential.

Q6. Do consultees agree that banning the listed materials accompanied by a “requirement to sort” will be effective in achieving high recycling rates? If not, what additional or alternative measures could be adopted?

We do agree that landfill bans should be introduced in conjunction with a requirement to sort. In the case of wood, recycling rates need to be protected from a growing move towards incineration of recovered *uncontaminated* wood. The proposal to restrict material to energy for waste (EfW) plants to contaminated wood is an important additional measure so that investment does not “lock Scotland into supplying EfW plants with large quantities of waste”, as the Consultation states. In order to achieve higher recycling rates for wood, the Government should also include wood streams in its list of key recyclable materials.

Q10. What single stream waste, such as contaminated wood, do consultees consider are appropriate for EfW?

The WPIF does consider contaminated wood appropriate for EfW, as it is extremely difficult to recycle and reprocess. In addition, its high calorific value makes it a useful fuel. However, it is vital that a clear and widely understood definition for “contaminated wood” is agreed so that recyclable material is not included.

If the definition of “contaminated wood” is too broad it could redirect materials that are currently being recycled – e.g. wood with coatings and paper. Providing that panel manufacturers can satisfy

health and safety requirements, much of this material can be reprocessed. To ensure that a suitable definition and standards are reached, the Scottish Government must consult closely with industry and recyclers so that recycling is maximised.

We also urge the Scottish Government to take note of standards being developed in England under an Environment Agency/WRAP protocol process: PAS111 – “Specification for the requirements and test methods for processing waste wood” (under development with BSI). This document refers to grades of waste wood, sources and end uses. As part of the process, the EA has commissioned a technical report on the manufacture of products from non-virgin wood (Waste Wood).

Q14. Do consultees have any other comments?

We welcome the Scottish Government’s nuanced and progressive approach to waste management, as set out in these proposals. However, we strongly encourage the Government to consider five major factors:

- The incentive regime for biomass energy generation
- Capital support for WID-compliant EfW plant (so that there is take-up of contaminated wood)
- A clear separation of recyclable and contaminated wood
- Future feasibility of a ban on wood to landfill
- Energy incentive and waste regimes in the rest of the UK (e.g. to prevent valuable waste streams such as uncontaminated waste wood being incinerated in England)

These factors are closely inter-connected; the biomass industry, subsidised by the Renewables Obligation, is increasingly looking to waste wood as a feedstock. As the consultation points out, it is vital to ensure that “only waste which could not have been recycled is incinerated”. Energy plants will naturally gravitate to the cheapest and easiest material – namely, uncontaminated wood – unless specific measures are put in place to focus incentives (and restrictions) around *contaminated* wood. The Scottish Government should explore what measures it can implement to prevent English and Welsh EfW plants from sourcing recyclable wood from Scotland.