

Restricting Wood Waste to Landfill in England

Call for evidence response form

The Waste Policy Review 2011 announced the Government's intention to consult on introducing a restriction on the landfilling of wood waste in 2012. Evidence shows that data on wood waste, particularly on the amount going to landfill or informal markets, is not clear. The questions listed below will help us build on existing information on the sustainable management of wood waste and measures to divert wood waste from landfill where this is the best environmental option.

To help us get the most out of any information you provide there is a 200 words limit in each text box. It would help us if your answers are short and succinct. Once you have answered the questions, please email a copy to wsm@defra.gsi.gov.uk

Please select the sector that is most appropriate to your organisation from the list below;

Wood producers/timber merchants Construction & demolition industry Wood recyclers Furniture industry
Panelboard industry Waste operators Waste management companies Re-use organisations Local authorities
Trade associations Environmental interest groups Joinery industry Forestry industry
General public

Question 1

Do you know of any reasons why any of these types of wood waste (see paragraph 6), or any others should not be included in any potential restrictions? Yes No

Please provide supporting evidence. (200 words maximum)

Question 2

Do you have any additional evidence that could improve our estimate of greenhouse gas emissions from wood waste in landfill? Yes No

Please list any sources. (200 words maximum)

Question 3

Do you agree that approximately 0.6mt of wood waste is going to landfill in England? Yes No

If no please provide evidence to show otherwise. (200 words maximum)

Question 4

Do you agree that wood waste is going to informal markets? Yes No

If yes what are these informal markets? (200 words maximum)

Question 5

What other sources of evidence on a) wood waste arisings and b) wood waste management routes are there? (200 words maximum)

[Note that questions 6-8 are relevant to paragraphs 46-53]

Question 6

Will planned facilities be sufficient to deal with wood waste diverted from landfill (see paragraph 6)? Yes No

Question 7

Is it likely that export supply will be diverted to UK facilities? Yes No

Question 8

Is there any risk that higher grade wood would be displaced from higher up the waste hierarchy to meet the 90% biomass required for ROCs? Yes No

[Note that questions 9-12 are relevant to paragraphs 54-58]

Question 9

Do you agree with the 'business as usual' assessment in paragraph 54-58? Yes No

Please comment (200 words maximum)

Question 10

How do you see the wood waste producing sectors evolving to 2020 without further policy intervention? Please comment on the sectors listed below and their treatment routes.

Construction and Demolition (50 words maximum)

Packaging (50 words maximum)

Municipal (50 words maximum)

Joinery and furniture manufacture (50 words maximum)

Question 11

What evidence do you have regarding further diversion of wood waste over and above the BAU trend? (200 words maximum)

Question 12

Are there any other costs and benefits to consider? Yes No

Please list.

Question 13

Is this (see paragraph 65) a reasonable representative cost (and range) for collection, sorting and onward transportation from HWRCs? Yes No

Please comment (200 words maximum)

Question 14

Do the cost and benefits estimate in table 6 (see page 19) look reasonable from your knowledge? Yes No

Please also comment on the variability of costs across and within sectors (200 words maximum)

Question 15

Is it right to assume that most of the additional landfill diversion is likely to come through recovery via incineration, suggesting that most of the available tonnage is likely to be of low grade? Yes No

Please comment (200 words maximum)

Question 16

Do you have any comments on the GHG estimates in table 7 (see page 20)? (200 words maximum)

Question 17

Can wood waste mixed with other waste streams be separated? Yes No

Please comment on a) practicality and b) cost (200 words maximum)

Question 18

Can different grades of wood waste be separated? Yes No

If yes, please comment on a) practicality and b) cost (200 words maximum)

Question 19

Is the grading system effective for identifying suitability for different end uses? Yes No

Please Comment (200 words maximum)

Question 20

What are the key issues in separating wood waste?

Please comment (200 words maximum)

Question 21

How practical would it be to apply a restriction to mixed loads?

Please comment (200 words maximum)

Question 22

Are there any sectors where sorting wood waste would be particularly difficult and why?

Please comment (200 words maximum)

Question 23

Please provide any additional evidence on the nature of wood waste disposal by small businesses. (200 words maximum)

Question 24

Is there merit in considering

- a) alternative approaches to a restriction? Yes No
- b) accompanying approaches? Yes No

Question 25

What would be the benefit in these approaches? (200 words maximum)

Question 26

What are the barriers to these approaches? (200 words maximum)

Question 27

Are there any other approaches we should consider? Yes No

Please outline (200 words maximum)

Question 28

What should be the lead in time for any restriction on wood waste to allow time for the necessary infrastructure to develop? < 5 yrs , 5 yrs , 10 yrs , > 10 yrs

Question 29

What infrastructure is necessary? (200 words maximum)

Question 30

What would be the practical difficulties and issues in implementing a restriction on wood waste?

Please outline (200 words maximum)

Question 31

Where should burden of proof/ responsibility lie? Producer Waste Management Company Other

Question 32

How much would the additional administration activity cost for different sectors?

Please comment (200 words maximum)

Question 33

Are there any possible unintended consequences of a restriction on wood waste? Yes No

Please outline (200 words maximum)

Question 34

Given the evidence available do you think there is a case for a further government action on wood waste?

Yes No If yes, should this be a) a restriction b) other measures c) combination of a restriction and other measures

Please outline (200 words maximum)

Question 35

Please outline further what government action you would like to see. (200 words maximum)

Question 36

We have set out areas where we are particularly keen to receive evidence. If there are other areas you believe we have missed, or do not highlight sufficiently, please draw them to our attention. (200 words maximum)

**Thank you
Landfill Restrictions team**