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Protocol for Verification of Wood Packaging Recycling in England, Wales, Scotland and Northern Ireland



Created by:

The Wood Panels Industry Federation and the Wood Recyclers' Association on behalf of their members.



Agreed with:

The Environment Agency for England & Wales, the Scottish Environmental Protection Agency and the Environment & Heritage Service of Northern Ireland.

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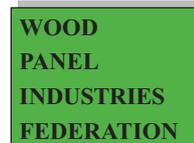
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WRAP (The Waste and Resources Action Programme). The Wood Recyclers' Association and Wood Panel Industries Federation wish to acknowledge the fact that production of the Wood Packaging Protocol has been funded totally by WRAP. Furthermore, WRAP has also lent significant expertise and resource in compiling this document.

WRAP helps individuals, businesses and local authorities to reduce waste and recycle more, making better use of resources and helping to tackle climate change. More information on WRAP's work can be found at www.wrap.org.uk

The Wood Recyclers' Association and Wood Panel Industries Federation believe the content of this Protocol to be correct at the time of writing. However, factors such as regulatory requirements are subject to change and users of the Protocol should check if necessary to confirm the current situation. While steps have been taken to ensure accuracy, The WRA and WPIF cannot accept responsibility or be held liable by any person for any loss or damage arising out of, or in connection with this information being inaccurate, incomplete or misleading.

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Note: This Protocol is accompanied by a bespoke wood packaging recognition training course designed to be delivered by management at the workplace.

Annex 2, paragraph 2 refers.

1 Introduction and key principles

- 1.1 The purpose of this protocol is to provide confidence in the claimed level of wood waste packaging recycling in the UK. This will be achieved by the accurate identification and quantification of wood packaging waste destined for recycling and the creation of documented audit trails that will be subject to independent verification.
- 1.2 This document sets out the key principles and implementation guidelines for the adoption of the above protocol. It relates to the conduct of accredited reprocessors as defined in the Packaging Waste Regulations¹ and to their suppliers. This protocol has been developed by the Wood Panel Industries Federation and Wood Recyclers' Association, on behalf of their members, and with the support of the Waste & Resources Action Programme.
- 1.3 The principles and implementation guidelines are endorsed and approved by the Environment Agency for England and Wales, the Scottish Environmental Protection Agency (SEPA), the Environment and Heritage Service for Northern Ireland and the Department of the Environment, Food and Rural Affairs. The key principles are based on procedures agreed by the Environment Agency and SEPA with accredited reprocessors in England and Scotland. As such this document can be considered as consistent with official regulatory guidance for the UK thus providing a benchmark for accredited reprocessors.
- 1.4 These arrangements will come into effect during the compliance year commencing 1st January 2008.

Key principles of the protocol

- Wood packaging waste will be identified and weighed as soon as possible after entering the recycling supply chain.
- A common method for the identification and assessment of packaging waste consignments will be utilised and operatives will be suitably trained in its use.
- Documentary evidence will be gathered to substantiate the identity, origin and quantity of any packaging within wood waste consignments to be recycled.
- Accredited reprocessors will generate documented audit trails to substantiate claims for the quantity of wood packaging waste recycled in each year.
- Independent verification of these audit trails and associated evidence, will be sought by accredited reprocessors and made available to regulatory agencies.

¹ Producer Responsibility Obligations (Packaging Waste) Regulations 2007.



2 Independent verification of packaging waste recycling claims

- 2.1 The purpose of independent verification is to provide unbiased assurance by suitably qualified third parties that audit trails (and associated documentary evidence) are true and accurate representations of events. Verifications will be conducted by suitably qualified parties such as those accredited to conduct such evaluation activities by the United Kingdom Accreditation Service (UKAS)².
- 2.2 It is proposed that accredited reprocessors will seek independent verification of their wood packaging waste recycling activities and their suppliers (with regard to their practices and documentary systems) at least once a year to an extent that meets the requirements of their accrediting agency. The cost of commissioning independent verification may be shared by agreement between accredited reprocessors and their suppliers.
- 2.3 The adoption of the above practices will provide substantiation and confidence that wood packaging waste has indeed been recycled to the levels claimed by accredited reprocessors. Thus the claimed level of wood packaging waste recycling in the UK will be assured and accepted with greater confidence.

Actions of accredited reprocessors to adopt the protocol

Timescale	Action by accredited reprocessors
During the period June-December 2008	Inform regulatory agency in writing of intention to adopt the protocol and implementation guidelines.
	To have come to agreement with packaging waste suppliers regarding the requirements of the protocol and implementation guidelines.
During the period January-June 2009	To be able to demonstrate adoption of the implementation guidelines as set out in Annex 1: Implementation Guidelines.
	To have ensured all relevant operatives have been suitably trained in the identification and assessment of packaging waste.
By June 2009	To be able to demonstrate audit trails for all packaging waste recycling undertaken since adoption of the Implementation Guidelines.
	Independent verification completed and report for whole of 2008 compliance year supplied to the relevant regulatory agency.

² UKAS is the national accreditation body recognised by government to assess, against internationally agreed standards, organisations that provide certification, testing, inspection and calibration services.



3 Scope of audit trail and independent verification

3.1 The purpose is to ensure that independent verification is secured for as much of the wood packaging waste recycling supply chain as is practical. The ability of companies within the chain to generate reliable evidence for the nature and origin of material collected or received will vary according to their capabilities and resources. The chart below illustrates the relative magnitudes of the sources of packaging waste supplied to accredited reprocessors³.



3.2 A substantial quantity of wood packaging waste (~15%) recycled by accredited reprocessors is supplied by companies directly involved in packaging activities, eg pallet repair companies or with direct custody of packaging waste, eg companies generating packaging waste such as broken pallets, where (aside from process waste, that should be separately recorded) the material supplied is predominantly packaging waste. Subject to an adequate audit trail (as set out in Annex 1, paragraphs AR 1, 2 and 3), the nature and quantity of this material can be verified relatively straightforwardly.

3.3 Specialist wood waste processors (as largely represented by the Wood Recyclers' Association) supply the majority of packaging waste (~70%) for recycling by accredited reprocessors, the majority of whom are wood panel manufacturers. Some of these specialist wood waste processors may themselves be accredited reprocessors. To ensure packaging waste is accurately identified and quantified, companies will adopt standardised procedures as specified in the implementation guidelines for suppliers to accredited reprocessors (set out in Annex 1, paragraph S 1). This also specifies the scope and nature of documentary evidence required to enable independent verification. Thus all claims for packaging recycling for material originating from these suppliers will be supported by comprehensive independently verified evidence.

³ Based on a survey of accredited reprocessors in 2003.



- 3.4. The balance of material recycled (~15%), is supplied by non-specialist organisations such as waste transfer stations, skip contractors or small waste wood processors. Mixed wood waste arising from these sources may be shredded before delivery so making it impractical to identify or quantify any packaging that may be present. Alternatively, un-shredded or pre-crushed packaging material from the above sources will be identifiable in accordance with this protocol. These suppliers also may not have weighbridge facilities or sufficient documentary evidence relating to the origin of the material to generate an adequate audit trail. It is likely these suppliers will be unable to adopt the provisions for suppliers (set out in Annex One, paragraph S1 below). In these cases, accredited reprocessors will make reasonable endeavours to ensure adequate documentary evidence (and supporting procedures) are put into place by these suppliers. However it will be a matter of judgement as to whether it will be possible to justify claims for packaging recycling. Where an adequate audit trail cannot be provided no packaging content will be claimed. This approach is proposed to reinforce the principle that evidence of packaging recycling will only be generated when sufficient documentary evidence is available to verify the packaging content.
- 3.5 By the adoption of the above measures (as set out in paragraphs 3.2, 3.3 and 3.4 and detailed later in this document), comprehensive independently verified evidence for the identification and quantity of packaging recycling will be generated by accredited reprocessors and their suppliers. Thus confidence in claimed overall levels of packaging waste recycling can be assured.



Annex 1 Implementation guidelines

Guidance for accredited reprocessors

Completion of the following actions will constitute compliance with the protocol. It is understood that most accredited reprocessors will already have in place many of the features described. The purpose of these guidelines is to specify those actions required for compliance with this protocol and to encourage the wider adoption of good practice.

AR 1 Establish supply agreements with suppliers of waste wood to include the following provisions:

- 1.1 A specification of materials suitable for supply, ie those materials suitable for recycling and limitations of allowable contamination. PAS104, created by WRAP in partnership with the industry, provides a model for the supply of recycled fibre for incorporation into panel board products.
- 1.2 Require the supplier to provide documentary evidence of the packaging content of each consignment supplied (based on the procedure set out in Annex 2).
- 1.3 Require the supplier to provide independent verification of the information supplied under 1.2 above on at least an annual basis. The cost of commissioning independent verification may be shared by agreement between accredited reprocessors and their suppliers.

NB. The supply agreement may also relate to other terms that are not relevant here, eg price, payment, quantity, rejected loads, term etc.

AR 2 Instigate a system of weighbridge control for incoming consignments of wood packaging waste for recycling

- 2.1 All material supplied must be weighed prior to or on receipt by the reprocessor using a calibrated weighbridge, and a printed weighbridge certificate generated thus creating a unique record for each consignment received. Any exception to this should be the subject of specific prior agreement with the regulatory agency.
- 2.2 Ensure that the packaging waste content⁴ of each consignment supplied is accurately described in the consignment inspection record or equivalent records of the reprocessor.
- 2.3 Maintain records for the passage of all packaging waste received and actually reprocessed, accounting for any variation from the original incoming quantity (for example if a load is rejected prior to entry into the manufacturing process). This will ensure compliance evidence will only be generated for the quantity of packaging waste actually recycled.

⁴ Materials constituting 'Packaging Waste' for the purpose of recycling to generate compliance evidence under the Producer Responsibility Obligations (Packaging Waste) Regulations 2007 are defined as 'All products made of any material of any nature to be used for the containment, protection, handling, delivery and presentation of goods, from raw materials to processed goods, from the producer to the user . . .'



AR 3 Create a clearly documented management control system to include:

- 3.1 The procedure by which the company manages and controls waste wood packaging inputs (to be in accordance with all requirements of this protocol). This should be comprehensive and detailed to clearly describe each of the following:
 - The documentary procedure for the purchase, consignment management and sale (where applicable) of packaging wood waste.
 - The process by which the company accounts for and calculates the quantity of packaging reprocessed.
 - The physical procedure for the management of wood waste entering the site.
- 3.2 Specify the personnel responsible for control of packaging waste recycling.
- 3.3 Provide examples of associated forms, records and related documents.
- 3.4 Specify the procedure and requirements for the completion of associated forms, records etc and whose responsibility this will be.
- 3.5 Maintain list of suppliers and the type of materials to be supplied, eg 100% packaging, 0% packaging or mixed wood waste, for inspection by relevant regulatory agencies.
- 3.6 Retain for inspection documentary evidence associated with packaging waste supplies (consistent with AR 1.2) for a minimum of 4 years.

AR 4 Generate an annual report for all packaging recycling activity

- 4.1 To include documentary evidence for all packaging recycling claims and details of independent verification undertaken.
- 4.1 To be submitted to the relevant regulatory agencies with the Q4 return⁵.

⁵ Currently February 28th each year.



Guidance for packaging waste suppliers to accredited reprocessors

S 1 General requirements for packaging waste suppliers

- 1.1 Enter into an agreement with the relevant accredited reprocessor to ensure the fulfilment of the provisions set out in paragraphs AR 1, AR 2 and AR 3 above.
- 1.2 Implement a clearly documented management control system to include:
 - 1.2.1 The procedure by which the company manages and controls waste wood packaging inputs (to be in accordance with all requirements of this protocol). This should be comprehensive and detailed to clearly describe each of the following:

The documentary procedure for the purchase, consignment management and sale (where applicable) of packaging wood waste:

 - The process by which the company accounts for and calculates the quantity of packaging reprocessed.
 - The physical procedure for the management of wood waste entering the site.
 - 1.2.2 Specify the personnel responsible for control of packaging waste recycling.
 - 1.2.3 Provide examples of associated forms, records and related documents.
 - 1.2.4 Specify the procedure and requirements for the completion of associated forms, records etc and whose responsibility this will be.
 - 1.2.5 Maintain list of suppliers and the type of materials to be supplied, eg 100% packaging, 0% packaging or mixed wood waste, for inspection by relevant regulatory agencies.
 - 1.2.6 Retain for inspection documentary evidence associated with packaging waste supplies (consistent with AR 1.2) for a minimum of 4 years.
 - 1.2.7 How it identifies, quantifies and weighs packaging waste for onward supply for recycling (as set out in Annex 2).
- 1.3 Retain records of packaging waste receipt and onward supply to relevant accredited reprocessors for 4 years for inspection by independent auditors. This information should include the following for each consignment of packaging waste.
 - A consolidated record of all consignments of packaging waste supplied for recycling for each year referring to all substantiating documentation.
 - Record of consignment weight, eg weighbridge ticket and report of inspection to verify packaging content.

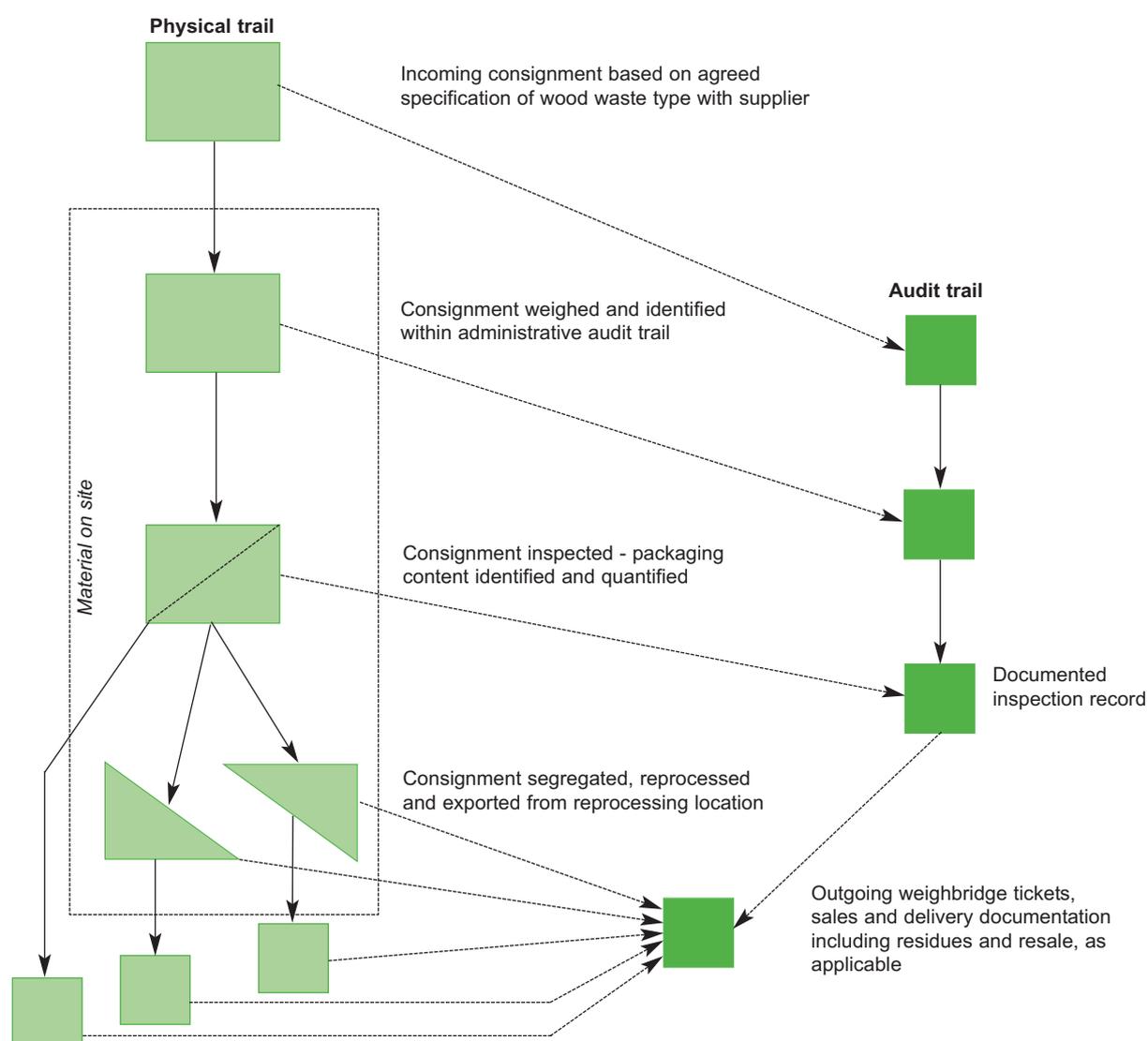
Copies of all statutory and commercial documentation both for the receipt and onward supply of the consignment, eg contracts, records of payment, invoices, correspondence, duty of care documentation.
- 1.4 **A common method for the identification and assessment of packaging waste consignments will be utilised (as set out in Annex 2) and operatives will be suitably trained in its use. Independent verifiers will seek independent evidence that training of relevant operatives has taken place and that the accepted methodology is employed.**



Annex 2 Procedure for the identification, quantification and handling of packaging waste materials

The following procedure has been agreed with the Agencies as being appropriate for the identification of packaging within mixed consignments of waste wood from other wood waste types. It relies upon the accurate inspection of waste wood consignments backed up by a comprehensive audit trail of supporting documentation.

Process flow diagram: the diagram below demonstrates the key physical steps to identify and quantify packaging waste and key stages of documentary evidence required.



NB. All the above data and documentation will be reconciled on a regular frequency to arrive at packaging throughputs.



The following table differentiates between packaging and non-packaging products.

Packaging	Non-packaging
<ul style="list-style-type: none"> ● Pallets and pallet components ● Cable drums and reels ● Boxes, cases and crates used for the protection of goods, eg machinery, parts ● Vegetable crates and fruit trays ● Slats for reinforced packaging ● Barrels for liquid goods eg whisky ● Wood chip used as filling for the protection of goods in containers ● Presentation boxes eg cigars ● Stillages, dunnage and skids ● Cover boards and bearer boards 	<ul style="list-style-type: none"> ● Forestry or timber waste ● Furniture and fitted units, eg kitchens ● Fencing and wooden structures, eg sheds ● Window frames, doors and other structural timber, eg planking, beams, flooring ● Residues from timber-using industries, eg furniture making ● Boards and signs ● Boats

NB. This is not an exhaustive list and is subject to modification but provides guidance on the principal categories of material commonly found in waste wood arisings.

Procedure for the identification of packaging waste

- 1 **Identifying incoming consignments:** Every consignment is to be weighed on a suitably calibrated weighbridge or equivalent weighing device. The information is recorded on a ticket which becomes part of the audit trail. This gives the gross weight of the vehicle and the load. The vehicle is then weighed before exiting the site giving its net weight. From these two figures the net weight of the load may be calculated (though not the weight of material reprocessed as deductions may be made from input tonnage, eg salvage of re-saleable material or removal of contamination). The origin of each consignment of material should be recorded using a delivery or collection notice.
- 2 **Identification of packaging content:** Every consignment will be individually assessed to identify packaging content but also to assess material quality (determining its end use) and to facilitate the removal of contamination. The practical steps for the identification of packaging are as follows:
 - The consignment is tipped onto a clear area to enable inspection.
 - The inspection is conducted by trained staff using a common methodology.
 - Packaging will be physically identified with reference to the list provided above.
 - The proportion of packaging within the whole load will be estimated.
 - The results of the inspection will be recorded in writing.
 - All records to be submitted to the audit trail.

Companies will ensure their operatives are trained to a common industry standard to ensure the consistently accurate identification of packaging. Appropriate employees undertake a wood packaging recognition course developed by the WRA and WRAP. The course is designed to be delivered at the workplace by management, and the training course CD (PowerPoint presentation) accompanies this protocol.



- 3 **Determining net weight of packaging:** Some packaging items, eg whole pallets, may be suitable for resale. Records of any items thus salvaged and resold, eg invoices/payment should be maintained and the weight deducted from the overall quantity of packaging received for reprocessing in any given period.
- 4 **Processing and onward supply of material:** Once inspected, material may be sent directly to the accredited reprocessor or mechanically reduced to generate a wood chip. This material may then be supplied to an accredited reprocessor for incorporation into a final product, eg panel board or reprocessed within the same facility to produce a final product.
- 5 **Reconciling the audit trail:** the following stages apply:
 - Once a consignment has been tipped the vehicle is weighed again, thus giving the net weight of the consignment.
 - The results of the inspection are compared to the net weight of the load thus arriving at the weight of packaging for that consignment.
 - Equivalent records for each consignment should be maintained, thus enabling the total weight of packaging to be calculated for any given period.
 - Reconciliations of all packaging receipts will take no less frequently than every quarter.

Each company may have slightly different methods of record keeping, but it will be their obligation to justify their methodology and resulting packaging claims, with evidence based on full records and original documentation.

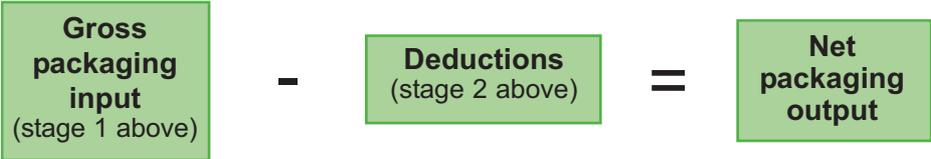
- 6 **Calculating packaging receipts and PRN declarations:** Companies may or may not manufacture their own products (and thus issue PRNs) and so there will sometimes be a difference between the amount of packaging received and the amount of PRNs issued. Logically, the final total packaging declarations (and PRNs issued) can never exceed total packaging receipts. The two following scenarios apply:

Scenario One	Scenario Two
<p>The supplier company ONLY processes waste wood for onward SUPPLY to an accredited re-processor for incorporation into a final product, eg panel board (against which PRNs may be issued)</p>	<p>A supplier who is also an accredited reprocessor processes waste wood for onward supply to another accredited reprocessor for incorporation into a final product, eg panel board (against which PRNs may be issued)</p> <p>and</p> <p>Incorporates recycled wood into its own products (eg animal bedding) as an accredited reprocessor</p>



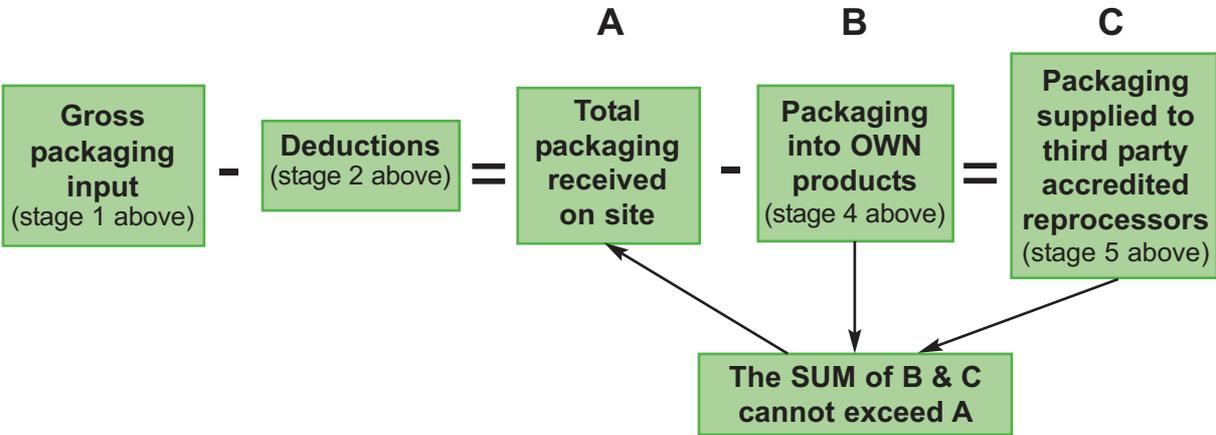
Calculation of packaging output by companies under Scenario One:

- 1 **Gross** packaging input (as physically identified and quantified, compared to incoming and outgoing weight evidence).
- 2 **Less** (1) packaging salvaged for resale, eg pallets and/or (2) deductions for contamination removal, eg metals, other waste etc (bills of sale, weight based evidence).
- 3 **Equals** packaging supplied to panelboard manufacturers for reprocessing (for which they may issue PRNs as the accredited reprocessor).



Calculation of packaging output by companies under Scenario Two:

- 1 Gross packaging input (as physically identified and quantified, compared to incoming and outgoing weight evidence).
- 2 **Less** (1) packaging salvaged for resale, eg pallets and/or (2) deductions for contamination removal, eg metals, other waste etc (documentary evidence required).
- 3 **Equals** total packaging received on site.
- 4 **Less** packaging reprocessed into other products, eg animal bedding, surfacing (PRNs issued by,accredited reprocessor).
- 5 **Equals** packaging supplied to panelboard manufacturers for reprocessing (for which they issue PRNs as the accredited reprocessor).



Annex 3 Parties involved in the generation of the protocol and guidelines

Originators

Wood Panel Industry Federation

Egger UK Ltd
Kronospan Ltd
Norbord Ltd
Sonae UK Ltd

Wood Recyclers' Association (see Note 1)

A&A Recycling Services Ltd	M McKenzie
Arthur Wright & Son	Norfolk Recycling Centre Ltd
AHS Ltd	Oldham Bros Ltd
AW Jenkinson Woodwaste Ltd	Pallets Unlimited
Bodens Woodwaste Recycling	Motward Timber Recycling Ltd
ECO Sustainable Solutions	R Plevin & Sons Ltd
Envirowaste Services Ltd	Reivers Re-processing Ltd
Giffords Ltd	Ronald Hull Jnr. Ltd
Griffiths Pallet Services Ltd	Tracey Timber Recycling
Growing-beds	Viridor Enviroskot Ltd
Hadfield Wood Recyclers Ltd	Viridor Bristol Ltd
Harper Contracts	Wastecycle
Hills Minerals & Waste	UK Wood Recycling Ltd
Howarth Environmental Ltd	Urban Forest
Kingsbury Pallets Ltd	Wood Recycling Services Ltd
D J Laing (Contracts) Ltd	Wood Yew Waste
Larner Pallets Ltd	Woodhorn Group Ltd

Note 1: The Wood Recyclers' Association makes compliance with this protocol a condition of membership for wood recycling companies

Consultees

**Environment Agency
for England & Wales**

**Scottish Environmental
Protection Agency**

**Environment & Heritage Service
for Northern Ireland**

Waste & Resources Action Programme

**Department of the Environment,
Food and Rural Affairs**

***Coordinated by*
Wood Panel Industries Federation and
Wood Recyclers' Association**



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