

**Wood Panel Industries Federation: Response to Environment and Sustainability Committee Inquiry
into Waste and Resources, November 2013**

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The WPIF would be happy to give oral evidence to the Committee.

The Wood Panel Industries Federation (WPIF)

The Wood Panel Industries Federation (WPIF) represents all British manufacturers of wood panel products. The industry is worth more than £600m a year and provides 7,900 FTE jobs across the UK.

In North Wales, Kronospan operates a wood panel plant in Chirk. Kronospan is one of the Top 10 manufacturing companies in Wales, employing over 600 people, mainly from the rural population (over 90% of who live within 10 miles of the site). In the last 5 years, this site has seen investment of £30m.

Waste

The WPIF supports the Welsh Government's aspiration of creating a zero waste society and this is demonstrated by Kronospan's actions in North Wales. Kronospan is the largest wood recycler in Wales and actively works to ensure that the best possible use is made of wood by processing it into products. This maximises wood's carbon sequestration properties and gives the wood a much longer useable lifespan than if it was immediately burned for energy generation. The company has invested in waste reduction for many years and is therefore supportive of the Welsh Government's efforts to make such action a standard feature of industrial operations across Wales.

Although the WPIF supports waste reduction efforts, the industry has some concerns about the impact of any waste reduction targets on companies like Kronospan. For companies that have already invested significantly in waste reduction any targets could prove to be unfairly challenging. Such investment means that waste levels are already very low and to be expected to continue to improve this by a specified amount every year would place an unnecessary burden and financial pressure on companies that have already put significant resources into waste reduction and continue to do so. It is essential that the introduction of any such targets would not see Kronospan and other companies that have invested in waste reduction being penalised for the early introduction of action in this area.

The WPIF also believes that the Welsh Government and WRAP Cymru should do more to encourage the recycling and reuse of wood waste as opposed to sending it to landfill or burning it for energy generation before the end of its usable life.

The WPIF is a strong supporter of the Waste Hierarchy and welcomes that this is a key focus of the Welsh Government's waste reduction strategy and a central tool for WRAP Cymru. It is also positive that the Welsh Government is considering banning untreated wood from being burned in energy from waste facilities as part of the proposals outlined in the Environment Bill white paper. This wood can be used by wood processors like Kronospan and it is therefore consistent with the Waste Hierarchy to maximise this use of the wood before it is used for energy generation. However, unless action is taken in other related policy areas these efforts will be undermined. For example, the subsidies provided by the UK Government for large-scale biomass energy generation are incentivising the purchase of domestic wood to burn for electricity generation. The wood types burned include virgin wood, small roundwood and sawmill products such as sawdust and post-consumer/post-industrial waste wood. These are all wood types that are utilised by wood processors for products which can be reused and recycled numerous times before they reach the end of their usable life. Unfortunately these subsidies provide energy generators with a very significant market advantage in purchasing this wood. They also damage efforts to encourage wood recycling and reuse by acting as a disincentive for segregation and sorting. Recovery of waste for energy should only occur when all other options have been exhausted, yet this is undermined by the use of wood types with other existing uses for energy generation.

Additionally, WRAP Cymru and the Welsh Government should consider wood a priority material for recycling and it is important that there is an effective means to collect wood waste and transport it to recyclers like Kronospan. However, it is also important that the focus on making products recyclable does not damage the wood panel industry's ability to ensure its products function as intended. For example, in some panel types the use of binders is essential. Although this can make recycling more difficult the products the panels are used to make will last for a number of years and can then either be reused, recycled or burned for energy generation once no further use can be made of them. This is still in keeping with the Waste Hierarchy and is certainly a much more efficient use of the wood than burning it immediately for energy generation or sending it to landfill.

Overall the wood panel industry is very supportive of WRAP's work and wider efforts to reduce waste. The industry itself works to reduce waste and ensures that its manufacturing processes make use of recycled wood. It is important that due attention is given to recycling and reusing wood waste without placing unfair expectations or regulations on an industry which has already invested heavily in waste reduction. Similarly it is also essential that both WRAP and the Welsh Government continue to look at ways to support the recycling of wood by ensuring that wood is not burned for energy generation before the end of its useable life.