

## Introduction – How to Report Rubble

The purpose of this guidance note is to set out clear instructions on how Local Authorities (LAs) should be reporting **source-segregated** rubble (including soil associated with the rubble) within WasteDataFlow.

Rubble can be defined as waste arising from works of construction and demolition, including waste arising from preparation works, (Regulation 5(2)(a) of the Controlled Waste Regulations 1992 and Schedule 1 (1) of the Controlled Waste Regulations 2012). Construction includes improvement, repair or alteration.

Local authorities are required to report all waste that falls under their control or possession within WDF. This 'local authority collected municipal waste' (LACWM), can include construction and demolition (C&D) wastes such as rubble, soil and plasterboard. Even if the rubble (or soil or plasterboard) is collected from household sources (e.g. brought by the public to civic amenity sites), it is classed as a non-household waste and is excluded from calculations of "Waste from households" and the NI192 comparator ("household waste recycled and composted").

There are 3 key collection and treatment methodologies for rubble:

- 1) **Rubble collected for recycling** – material intended for reprocessing via an industrial process into new or different products, sometimes referred to as full recovery e.g. recycling rubble into aggregate to be used in construction processes.
- 2) **Rubble collected for reuse** – materials intended for using again in road construction, for example, without any further reprocessing.

**Note** - Rubble used in landfill restoration (above the engineered cap) can be classed as recycling/reuse provided that it meets the definition of 'recovery' as set out in the Environment Agency guidance – *Defining Waste Recovery: Permanent Deposit of Waste on Land, March 2010*.

- 3) **Rubble collected for disposal** – material intended for disposal. Note, any rubble (regardless of the process it has been subject to) that is used for daily cover or roads on landfill sites is not a recovery operation and is classed as disposal. The reason for daily cover being considered a disposal operation is outlined below:

*Waste recovery is about using waste to replace other non-waste materials to achieve a beneficial outcome in an environmentally sound manner. The clearest indicator of waste recovery is when it can be shown that the waste used is a suitable replacement for non-waste materials that would otherwise have been used to achieve the end benefit.*

*The purpose of daily cover is to cover wastes deposited during the course of a working day to prevent disturbance by scavenging of birds and other wildlife and the minimisation of odour or dust. The nature of the material used is not generally specified in the permit conditions but left to the operator to determine. The over-riding purpose of accepting the materials at the site will be for disposal. There is no suggestion that use of virgin inert waste or other materials have to be used for daily cover and therefore the 'replacement' argument fails.*

*The use as daily cover is temporary in nature and it will be incorporated into and become indistinguishable from the waste mass of the landfill. An operation can't be both a disposal and*

recovery operation; it must be one or the other. Therefore, the use of daily cover must be considered disposal of waste since it is carried out as part of and is integral to the overall disposal operation.

For further information on how to determine whether your waste management operation is defined as recovery please refer to the *Environment Agency Guidance EPR 13 – Defining Waste Recovery: Permanent Deposit of Waste on Land, March 2010*.

The table below sets out how each type of LA should report **source-segregated** rubble tonnages both at the point of collection and at the point of treatment/disposal.

See the guidance note [How to report Local Authority Collected Segregated Construction and Demolition Waste from 1st April 2012 \(England\)](#) for further details on recording other source-segregated C&D waste streams.

Collection Entries (tonnage input)			
Collection Source	LA Type	Question	Comments
Segregated rubble collected from <b>household sources via CA sites</b> for recycling or reuse.	UA or WCA	Qu16	Source-segregated rubble collected for recycling or reuse from household sources at the CA site should be reported against the “Rubble” material category in either the recycling or reuse column.
	WDA	Qu14	<b>Rejects</b> – Only rubble which has been rejected at the point of collection should be reported in these questions. These rejects must not be reported again in Qu100.
Segregated rubble collected from <b>all non-household sources</b> for recycling or reuse.	WCA, WDA or UA	Qu11	Source-segregated rubble collected from non-household sources for recycling and reuse should be reported against the “Rubble” material category in either the recycling or reuse column. <b>Note</b> – Rubble collected at CA sites from non-household sources should be reported in this question. <b>Rejects</b> – Only rubble which has been rejected at the point of collection should be reported in this question. Rejects must not be reported again in Qu100. This does not include fly-tipped loads which consist solely of rubble-type materials (see the FAQ section below).
Segregated rubble collected for <b>disposal</b>	WCA, WDA or UA	Qu23	Source-segregated rubble should be reported under the “Collected non-household waste: Construction and Demolition” category. This includes rubble that is collected at CA sites.
Rubble back allocated to WCA as a result of further processing of mixed residual waste	WCA	Qu23	Rubble mixed in with residual waste would not be classed as construction and demolition waste. The collection tonnage would be reported in the appropriate collection category in Qu23, depending on the source of collection. The collected tonnage would not be reported in the construction and demolition category in Qu23 as only source-segregated rubble is classed as construction

Collection Entries (tonnage input)			
Collection Source	LA Type	Question	Comments
			and demolition waste. Please follow the guidance on back allocation in the Q100 Data entry guidance document.
Rubble collected commingled with other material	WCA, WDA, UA	All (collection questions)	Rubble collected commingled with other material types would not be classified as source-segregated and should be recorded under the "Other materials" material category within the specific question.
Segregated rubble sent for <b>recycling or reuse</b> .	WCA, WDA or UA	Qu100	<p>Record under the "Rubble" material category. Record all rubble which has been sent for recycling or reuse <i>i.e. total tonnage of rubble collected minus any rejects at the point of collection</i>. Make a note in the "Comments" box of the Reprocessor / Reuse node to state how the material is reused or recycled.</p> <p><b>Rejects</b> – In Qu100 the following types of rubble rejects should be included as an output from the Reprocessor node:</p> <ul style="list-style-type: none"> <li>Rubble which has been rejected at the gate of the reprocessing facility. Create an output node using "Contamination (gate rejects)" as the "Output waste type".</li> <li>Rubble, which following a further sorting process, has been sent for disposal or used on a landfill site for daily cover or roads. This is defined as disposal as outlined in the above definitions. Create an output node using "Contamination (process rejects)" as the "Output waste type".</li> </ul>
Segregated rubble sent for <b>disposal</b>	WDA or UA	Qu100	Rubble sent for disposal (as defined above), should be reported in Qu100 under the appropriate disposal node using the "Rubble" material category.
Rubble collected commingled with other material	WCA, WDA, UA	Qu100	Rubble collected commingled with other material types (e.g. a fly-tip) and subsequently separated would not be classified as being segregated at source and should therefore be recorded under the "Other materials" category within the Reprocessor / Reuse node and associated Final destination node in Qu100.

## FAQ on Rubble

Question	Answer
<p>The segregated rubble collected at Civic Amenity sites is used on landfill sites for daily cover, where should this be recorded in WasteDataFlow?</p>	<p>Rubble that is being used for road fill, capping or any other use within the landfill is classed as disposal and not recycling or reuse.</p> <p>Source-segregated rubble collected for disposal should be reported under “Collected non-household waste: Construction and Demolition” in Q23. This is required to enable the subtraction of construction and demolition tonnages from the mass balance calculation.</p> <p>The tonnage sent to landfill should also be recorded in the specific landfill node (i.e. inert, hazardous or non-hazardous landfill) in Qu100.</p>
<p>Does rubble count toward my household recycling rate?</p>	<p>No, all rubble is municipal non-household waste, regardless of its source of collection. Within WasteDataFlow rubble tonnages should be recorded using the Rubble entry on the material list or under the “Collected non-household waste: Construction and Demolition” category in Q23. Rubble tonnages sent for recycling/reuse are excluded from NI191 and NI192, but rubble sent for disposal is included in NI193 (as it is a municipal waste).</p>
<p>I am unsure whether to record my rubble as recycling or reuse?</p>	<p>“Recycled” means municipal waste materials which have been collected and separated from municipal waste with subsequent processing to produce marketable products. Recycling differs from product re-use because of the need to reprocess the recovered material.</p> <p>“Reuse” means items removed from the waste streams for purpose of reuse without significant reprocessing.</p>
<p>I am a WCA, how should I report rubble which is back allocated from the residual waste stream?</p>	<p>No construction and demolition waste (such as rubble) should be back allocated to and reported by WCAs following the further processing of their residual waste. Any aggregates or similar material extracted from residual waste should be recorded as “Other materials” with a note in the comment stating the nature of the material.</p>
<p>I am a WDA/UA, how should I report rubble which is extracted for recycling from the residual waste stream?</p>	<p>In Qu100 you will need to create a branch in your tree to show how the residual waste is processed. The primary node will be the first step in the residual waste treatment process e.g. a Residual Waste MRF. Rubble extracted from the residual waste during the treatment process and sent to a reprocessor would then be recorded in a “Reprocessor-recycling” node which is created as an output from the treatment node. The rubble tonnage would need to be reported in the “Other material” material category in the Reprocessor node and associated “Final destination” node.</p>

Question	Answer
I collect both separately collected rubble and some fly-tipped rubble for disposal, how should I report these tonnages?	Separately collected rubble tonnages should be reported in Q23 under "Collected non-household waste: Construction and Demolition". Fly-tipped rubble should continue to be reported under "Waste Arising from clearance of fly-tipped materials" or "Collected non-HH: other" with a comment to note what this material relates to. Fly-tipped rubble is not considered a segregated C&D waste stream and will therefore not be deducted from the mass balance calculation.