Community-led reuse of resources

Information for community groups and social enterprises setting up projects to reuse surplus building materials and products
About this action pack

This action pack has been developed as part of a series produced by the Academy of Champions for Energy (Ace). Each pack has been written and reviewed by community activists with first-hand knowledge of what it takes to set up social enterprises to address the challenges of peak oil and climate change. Inside you will find practical suggestions and inspiration for setting up your own community initiative, helping those who are ready to take action to do just that.

This series of action packs was originally funded by NESTA and produced by Local United (www.localunited.net), a co-operative of social entrepreneurs which aims to speed up the rate at which good ideas are adopted by communities. These latest revisions have been produced by Ace, a sustainable energy initiative running in the UK, Ireland, France, Belgium and the Netherlands, funded by the INTERREG IVB NWE programme.

Ace aims to bring together ‘Champions’ of energy transition across the public, private and community sectors to share and disseminate information to increase uptake of renewable energy and energy efficiency measures. The focus is on using resources already available within our communities to build sustainable futures. This means citizens working together to find collaborative solutions which integrate energy transition into our everyday lives. Citizen engagement and community-led action are therefore central to this vision, and these packs aim to demonstrate how to build projects from the bottom up for the benefit of everyone. For more information about Ace visit www.aceforenergy.eu. For more guidance on citizen engagement visit www.aceforcommunities.net.

Each pack provides a useful ‘how to’ guide, illustrated by inspirational stories of what can be achieved when communities come together to act. Many of the packs contain technical advice, links to other information, copies of legal templates or lists of regulations all of which can help communities get their projects off the ground. Of course, any information provided is only as up to date as the day it goes to print.

Downloadable versions of the packs are available on the many partner websites. If your group or organisation would be interested in sharing the packs on your own website, contact the National Energy Foundation via ace@nef.org.uk. Community groups who have used the packs to support their own projects are also invited to provide information on how useful the packs have been, what other information should be provided or any other feedback which may improve future packs.
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SUMMARY

This action pack provides information for organisations seeking to set up a reuse centre. It is aimed at both community groups wanting to start up a new enterprise and those running an existing enterprise looking to expand its operations. While the focus is on reuse of construction and building products, there are also suggestions for setting up a variety of different reuse or repair centres – from a furniture reuse enterprise, to a repair cafe or ‘Men-in-Sheds’ project.

Although building products offer perhaps the greatest reuse potential, the most rapidly growing reuse enterprises in the UK are those with a high level of citizen engagement. This goes beyond direct reuse exchange (e.g. collection of surplus bricks from a construction site or making furniture available cheaply or freely to those on benefits locally) to include repair activities. The inclusion of repair (or upcycling) in a reuse enterprise can help improve the viability of the enterprise in a number of different ways:

- Increase footfall by bringing different members of the community together;
- Potential revenue from activities that support development of new skills and volunteering opportunities;
- Higher public profile through co-locating different activities with different audiences (e.g. Men-in-Sheds, Repair Cafe) as well main reuse enterprise.

Local citizen engagement is therefore vital for becoming a sustainable reuse enterprise that gains a foothold in the local economy. This may be achieved through training, venue-hire, linked activities, establishing a high community profile (without increasing advertising expenditure) or added-value through community-initiated repair projects.

For these reasons, rather than seeing the reuse centre’s meeting place function as an add-on, it is perhaps more appropriate to see it as central. Acting as a meeting place not only benefits a reuse enterprise, by supporting its financial wellbeing and business plan, but also adds social capital locally. These sorts of enterprises can act as centres for community diffusion of new ideas, and be hives of activity that build momentum for a new ‘sharing economy’. Citizen engagement by creating these sorts of enterprises in all communities is vital if we are to transition to a society that is living within One Planet’s worth of resources – by creating the space where our collective intelligence allows us to better refurbish, upcycle and reuse what we already have, together.

This action pack draws on lessons learnt from a pilot enterprise, branded as a ReIY (Reuse It Yourself) Store, trialled by BioRegional in 2009-2010. It also cross-references different reuse enterprises, particularly wood recycling, community repaint and furniture reuse projects in the UK.

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1 See [www.frn.org.uk](http://www.frn.org.uk), [www.communityrepaint.org.uk](http://www.communityrepaint.org.uk) and [www.communitywoodrecycling.org.uk](http://www.communitywoodrecycling.org.uk)
The main outcomes of such enterprises are summarised as:

- Reducing the climate impact (‘embodied energy’) and resources used to make building products, especially those used in building our homes;
- Creating sustainable local employment and volunteering opportunities; and
- Increasing citizen engagement through raising the profile of reuse in the DIY and small building sector and addressing the main barrier to this: the local provision of reusable products.

A summary of the opportunities associated with reusing building products is introduced below. Guidance is then divided into three sections:

1. Why focus on setting up a reuse centre, and why focus on construction products?
2. How can you do this? What is needed to progress from engaging a community to successfully starting a reuse enterprise?
3. What supporting information is available to help your enterprise succeed?
INTRODUCTION: Opportunity to scale-up reuse, including surplus building products in Europe

A reuse centre intends to provide a one-stop-store of house-building and household items that are readily reusable (see Appendix C below). Social, environmental and financial benefits can be promoted through co-location of community space, provision of training and volunteering opportunities and co-ordination of marketing and sales of a full range of reuse products. This action pack sets out how new reuse social enterprises\(^2\) might be established (or existing enterprises scaled-up) in Europe to replicate the level of building product reuse already occurring in the US, with a particular focus on the local collection and retail of surplus construction products.

In Europe, there are already networks of reuse stores. These include the Kringwinkel network of over 100 reuse stores in Belgium and the London Reuse Network\(^3\). These networks are focused upon extending the scale and coverage of reuse of household items, from bric-à-brac up to furniture. Another example is the proliferation of Repair Cafés. Since the first one was launched in the Netherlands in 2009, the number of Repair Cafés across the world has ballooned, reaching 400 in January 2014, aided by the production of guidance on how to set them up \(^4\). Another initiative that has taken off is Berlin's “borrowing shop” – billed as a “library of things”. This has already inspired other borrowing shops, a borrowing bar and a café with a “cupboard for things”.

In contrast, scaling up of reuse in the US, Canada, Australia and New Zealand has included significant reuse of building materials. However, this has been built on a strong drive for local citizen engagement. The key aim of many of the 1000+ reuse stores in the US alone is to provide community benefit. Many of these are Habitat for Humanity ReStores that have been established with the remit to generate and then redirect surplus income to build houses for the homeless.

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\(^2\) A social enterprise can be a business with social aims (e.g. a member of the Social Firms UK network) or a not-for-profit business or charity. The aims of the ReIY social enterprise are set out in the ReIY Charter document.

\(^3\) See www.dekringwinkel.be/ and www.londonreuse.com/.

\(^4\) See www.repaircafe.org for details including how to start up one in your town.
Many other members of the US Building Material Reuse Association (www.bmra.org) have similar aims. For example, a US charity, St Vincent de Paul, operates eight large reuse warehouses and a car park in Lane County. These enterprises reuse building materials, deconstruct mattresses and generate a turnover of over $20m. Around $7m in surplus is produced, which, like Habitat for Humanity, is primarily reinvested into social housing, but is also used to deliver other community services and training. St Vincent de Paul combines reuse at scale with remanufacturing, training and social outcomes.

This movement is starting to be replicated in Europe, with the first European Habitat for Humanity ReStore opening in Northern Ireland in 2013. Another key aim of reuse enterprises has been to create jobs and new skills for employment. In the US this has included establishing new training courses and qualifications for deconstruction (for example see https://yestermorrow.org), as set out in Unbuilding (Guy, B and Falk R, 2007). Such training supports the development of reuse enterprise teams who not only collect items for reuse, but can also deconstruct buildings and de-nail studwork in order to secure building products needed elsewhere in the community.

**OBJECTIVES: Why choose to start a building product reuse enterprise?**

**Objective 1 - Why focus on reusing building products?**

The building industry accounts for at least 10% of total UK CO2 emissions, which works out at 1-2 tonnes of CO2 per person each year. However, there is still very little support for reuse in the waste sector, and few alternatives to sending construction waste to landfill are considered beyond crushing and burning the waste produced. There is also little consideration of widening the definition of ‘zero carbon homes’ to include the energy used for building and maintenance.

![Figure 1 UK Construction CO₂ emissions. Source: Low Carbon Construction IGT Report, p21](http://www.bis.gov.uk/assets/biscore/business-sectors/docs/l/10-1266-low-carbon-construction-igt-final-report.pdf).

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5 See [www.svdp.us](http://www.svdp.us)

6 See [http://www.habitatni.co.uk/get-involved/44/restore.aspx](http://www.habitatni.co.uk/get-involved/44/restore.aspx)

7 The way in which deconstruction provides an opportunity for widening community engagement is set out by Bob Falk and Brad Guj (2007) in *Unbuilding: Salvaging the Architectural Treasures of Unwanted Houses* (see pages 40 and 217 for example). Also see BioRegional’s guide on taking a reclamation-led approach to demolition (www.bioregional.com) and the weekly e-news bulletins of Salvo, the UK’s network of architectural salvage dealers (www.salvoweb.com).
The sustainability value of local reuse of building materials is also recognised in the first Energy Descent Action Plan for Kinsale\(^8\) which led to the Transition Towns movement. This plan proposes that a sustainability centre, providing training, and a sustainable building code are both introduced – as well as prioritising the use of local and sustainable building materials. Both of these aims are brought together in the reuse centre concept set out here.

**Objective 2 - Why set up a building product reuse centre?**

The overall aims of a building product reuse centre is similar to that of most of reuse projects in the UK, except that it is bigger and focuses on construction products. This means that the potential benefits are also similar, as outlined below:

- **Scale up reuse.** Centres increase the total amount of reuse in the UK by expanding into one area where there is currently limited reuse occurring, utilising surplus building materials from construction, refurbishment and DIY/small building sites.

- **Reuse building products locally.** As building products are bigger than what is normally found in charity shops, setting up projects to reuse building products will need bigger centres for reuse. Reuse centres can therefore act as a hub to co-locate and reduce costs for existing reuse projects, bringing together furniture, white goods, bric-a-brac, scrap stores, paint reuse, community wood recycling and Men-in-Sheds projects. Further benefits can be gained by helping to reduce the costs of improving and constructing new social housing or community facilities – either directly by providing materials, or through redirecting financial surplus, as reflected in many of US projects noted above.

**Outcomes: Social and Environmental**

Reuse sits above recycling on the waste hierarchy (reduce-reuse-recycle-energy recovery-disposal). It reduces the impacts of virgin resource extraction and saves all the carbon embodied in what is reused. For example, crushing bricks only saves 5% of the carbon to make bricks, whereas recycling glass saves around 30% of the embodied carbon.

However, the main beneficiaries of a reuse centre are often local people. Social services are greater than the ecosystem services delivered! Sector research shows most projects are set up first to alleviate poverty, and then to provide training and work experience – while environmental benefit is important, waste reduction ranks third in terms of motivation for the successful projects that exist across London\(^9\).

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\(^9\) See Figure 3 in [http://legacy.london.gov.uk/gla/publications/environment/reuse-fullreport.pdf](http://legacy.london.gov.uk/gla/publications/environment/reuse-fullreport.pdf)
A Successful US Model for Reuse Centres: Large, Not-for-Profit, led by Social Aims

There are over 500 stores that reuse surplus building materials in the US. Over 200 of these are run by Habitat for Humanity. Many employ homeless people to provide a back-to-work experience. In Madison, Wisconsin, 15 houses were built for the homeless from the store’s surplus over 5 years, and priority of occupation went to those working there. Community Campus 87 has spent 25 years running a similar project in the north east of England. Training is provided in new skills to people to retrofit empty homes, which it then rents to them and uses money generated to fund new void purchases.10

St Vincent de Paul in Lane County, US, runs 8 reuse stores and has an annual turnover of $25m and a surplus to the community of $8m each year. Reuse charities deconstruct over 100,000 beds each year in the US, and stage sets and costumes on Broadway are generally made from reused materials, thanks to a warehouse donated by the New York waste department (see www.mfta.org). However, such reuse activities remain rare in the UK.

Specific benefits can include:

- **Creating new jobs and helping economic regeneration.** Typically 1 job in landfill per 10,000 tonnes of waste/year can be replaced by 25 reuse and remanufacturing jobs.11
- **Reducing waste to landfill, landfill costs and fly tipping.** Over 1,000 tonnes of waste diverted from landfill by the Yooz project in Scotland (see www.yooz.me) in the first 9 months. Established projects typically take up to 500 tonnes of reusable items each year.
- **Reducing CO2 emissions.** Dependant on the type and mix of products and materials, but is typically 0.5-1 tonne embodied CO2 per tonne of waste avoided, or higher for timber and highly manufactured/electrical products.

A centre branded as ReIY could therefore enable:

- **Mainly Re-use of surplus building products for DIY; but also**
- **Re-Invent Yourself - training and creating new skills and green jobs; and**
- **Re-Inspire Your community - a hub to help foster other sustainability projects and share knowledge and ideas in a local area, between both residents and organisations (e.g. public sector, businesses and voluntary sector).**

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10 See [http://www.communitycampus87.co.uk/](http://www.communitycampus87.co.uk/)
11 Communication from the Commission to the Council, the European Parliament, the European Economic and Social Committee and the Committee of the Regions: **Taking sustainable use of resources forward: A Thematic Strategy on the prevention and recycling of waste (21.12.05)**
While reuse enterprises tend to be focused on a locality, centres can benefit from joining a national or regional reuse network. Such networks can provide a platform for sharing lessons learned, training, job creation contracts and securing agreement for surplus product from larger retail and construction firms.

**Introduction to the generic business plan for UK centres** (produced in 2008)

Particular aspects that have made the success of reuse possible in the US are that reuse is cheaper than recycling for companies, as reuse to not-for-profit organisations can be offset against tax liability. In addition, many buildings are made of wood, so can be relatively easily deconstructed.

In England (but not in Scotland) there is a tax incentive for charities to occupy empty warehouses, as charities have an 80% business rate exemption. This might provide opportunities in urban areas for significant redevelopment, refurbishment and strip-out of existing buildings. By occupying the premises the landlord can reduce his business rate payments, so may be able to offer a reduced or zero rent to the reuse enterprise, at least for the initial year of the business, which will help reduce start-up costs (see Madison County ReStore, USA)
https://www.gov.uk/government/collections/meanwhile-use-leases-and-guidance-for-landlords to download legal agreement). This is currently only applicable for England, and will be attractive where there are long-term empty premises and the demand for occupying the premises at a commercial rate remains low.

However, to start a new project it is good to agree a longer term (e.g. 1+ year) lease agreement. As a result this option to use of surplus space in empty properties may be more an opportunity to expand an existing enterprise (e.g. for retail or short-term storage) rather than the best location to start a new project.

A basic business plan has been produced for the UK based on a study of the reuse charities in the UK, and six year cash flow and operational structure of the ReStore in Madison, Wisconsin, in the US. This business plan is downloadable at www.reiy.net.

Key points are summarised as follows:

- The concept is to collect a large variety of building products from sites – but focus on those items that can be accumulated and sold easily. The aim is to have a high throughput of saleable lower value items, rather than a low rate of sale of higher value items (architectural salvage) or a low rate of sale of lower value items because there is a wide and unpredictable selection of goods (junk shop). Therefore a minimum size of 10,000-20,000 sqft is proposed.

- The project is based around a large warehouse with some external space (parking, containers). A piece of land without fencing is not considered appropriate. A warehouse allows remanufacture, refurbishment and sales to happen all year round – although limited sales in November–February are normal.

- Location is important, but a town centre location is not expected.

- The enterprise is not likely to be financially viable if the buildings and land are secured at typical corporate rents, except where these are exceptionally low. Unless very low rent is secured, the enterprise will probably require additional enterprise income (such as architectural salvage or training), subsidised rent or grant support.

- The enterprise can attract an 80% exemption from business rates if it is set up as a charity, so this is recommended.

- We recommend charging for collections to cover haulage costs and only collecting items that can be sold for reuse (timber for recycling is an exception). However, drop-offs of items free-of-charge are also an option.

- The enterprise is likely to require additional income above that derived from the collection
and sale of reused items. Sales of eco-products and training are both proposed.

- The financial model shows the project starting with a focus on a limited range of product (e.g. timber and bricks), expanding its product range once sales are established in years 2-3 to be financially sustainable after 5 years.
- The business is based upon an upfront grant/financial support of around £100,000, but does not include reduction in rent value.

- The financial model could be viewed by an existing not-for-profit enterprise as a strategy to expand from a current product range (e.g. wood recycling, scrap store, paint recycling or furniture) to create a larger enterprise that can not only trade in building products, but also receive and sell other products at a larger scale.

- The model does not explore the viability of different forms of training – but budgets for training/social outcomes that generate a net financial contribution would help the enterprise become financially self-sufficient. Therefore, the financial model does not include volunteer coordinator funding which will enable the enterprise to provide employment for those Not in Education, Employment or Training, or support those with mental or physical disability. Activities like this will help a centre’s viability, but are not necessarily essential in the business plan, which is designed as a template to secure a site.

**Minimising Risks**

- *All parts of the enterprise contribute financially:* The enterprise requires the establishment of a number of different operations – reuse collections, retail store, training/volunteer management. To limit risks these are considered to all be managed as profit centres. This may be carried out by one organisation in partnership. For example, Green-Works operated in London by subcontracting the warehousing and collections of its office furniture to First Fruit, a social enterprise warehousing organisation. However, it is noted that benefits from training should be designed to be retained within the organisation.

- *Collections too expensive:* ReIY do not propose free collections, as this leaves the savings with the organisation served and additional costs borne by the enterprise. However, some companies or councils may expect free collections. Collections that require quick sales of product at a high value increase risk.

- *Collections of hazardous materials:* See Appendix C below for an indication of products to be collected. Items classified as hazardous materials, and items such as bags of plaster, cement or plasterboard, should only be collected if there is a pre-agreed immediate sale (such as contract to supply products to a local training college). This is because they will incur disposal costs. Collections from demolition sites should only be carried out if
asbestos training has been undertaken and items collected require no reprocessing. Reprocessing would invalidate the waste permit exemption for reuse, and will have to meet full waste permitting requirements.

- **Sufficient sales of product:** Product sales should be established and secured for product lines as the business expands to collect a wider variety of products. Contracts with construction colleges, with projects to retrofit empty homes/voids, and regular purchases, e.g. of pallets, from a number of small builders will all help increase the throughput of products. Some items may be refurbished, refinished (e.g. timber re-planed) or remanufactured (e.g. making bird or bat boxes) to supply an existing market or to increase sale value. This will also increase volunteer and trainee opportunities. This could include co-location of a Men-in-Sheds project, but this will need additional space, capital expenditure for tools and separate organisation.

**Construction reuse pilots and intellectual property**

BioRegional have supported initial ReIY pilots in Croydon (with a furniture reuse charity) and in Kent (to collect products to be used for construction training). A pilot is also being funded by the Welsh Government and others in Cardiff. In Scotland there is one building product reuse and recycling centre called Yooz, which has been sustainable for a number of years, and in Northern Ireland there is a single pilot surplus DIY store run by Habitat for Humanity. However, the best example of construction reuse enterprises in the UK are the growing network of community wood recycling projects and those architectural salvage businesses that can afford to train in lower value products.

![The Yooz collection and delivery van, Glasgow](image)

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12 See [http://menssheds.org.uk/](http://menssheds.org.uk/)
14 See [www.yooz.me](http://www.yooz.me)
15 See [http://www.habitatni.co.uk/get-involved/44/restore.aspx](http://www.habitatni.co.uk/get-involved/44/restore.aspx)
The enterprise concept described above is shared in the public domain for use within the not-for-profit sector. Enterprises can use the ReIY brand for their own store and/or as part of the ReIY network. For further details contact jonathan.essex@bioregional.com or see www.reiy.net.

**ACTION PLAN: From idea, to community support, to enterprise**

**Starting a new enterprise – what tips the balance, and why are some things mainstreamed but others not?**

There is no other way to say this: setting up a community reuse enterprise at scale in the UK is challenging. Development of different reuse enterprises has happened in waves in the UK:

- Community furniture reuse enterprises established quickly across the UK during the recession in the 1980s, and are now widespread;
- From the late 1990s the scale of architectural salvage in the UK has fallen, with the reduction in timber reuse partially replaced by a slow spread of community wood recycling enterprises;
- Foodbanks and Men-in-Sheds projects, tackling the cost of living crisis and replicating the Australian model aimed to address social isolation, spread quickly from 2009-10;
- Other initiatives have also taken off to varying amounts, with patchy coverage across the UK, including bike repair, paint reuse, pre-loved baby items, children’s scrapstores, and most recently repair café’s to fix and restart broken electrical equipment (see thererstartproject.org).

The first of each of these the project was breaking new ground. Whether it was a furniture reuse charity operating from a garage, or Age UK starting Men-in-Sheds projects, or Habitat for Humanity Northern Ireland launching their pilot with backing from the Federation of Master Builders, every new project is a pioneer.

**An entrepreneur - or just a man (or woman) with a plan?**

But what would it take to reuse at the same scale in the UK as in the US, Canada, Australia and New Zealand? It could be argued that this requires a replacement of the perverse incentives that encourage waste recovery and disposal with stronger financial incentives to establish and operate reuse enterprises in the UK. This includes not just the fact that there is a subsidy for burning waste and not for reusing it (except for household items in the UK), but also the length of procurement contracts and size of capital grants available for reuse compared to downcycling and waste-to-energy projects.
Certainly in the US, charities have benefitted from tax incentives to reuse – through the value of goods donated being able to be offset against corporation tax. In the UK, the rental and purchase costs for premises are much higher. However, with many shops empty during the recession, the potential for a pop-up reuse project does exist. And with persistently high unemployment, the potential for a large-scale, country-wide focus on maximising reuse, repair and remanufacturing could have significant job creation, as well as environmental benefits.

A vision for one million social enterprise jobs was set out by Colin Crooks, the founder of the GreenWorks reuse enterprise\textsuperscript{16}. A vision for creating and replicating a series of social enterprise hubs, focusing on social and health benefits in the community, was successfully piloted in the Bromley-by-Bow centre\textsuperscript{17}. In both cases the success of the enterprise was based on one person with persistent commitment and passion for making the enterprise work. It is that passion that often makes some projects succeed while others fail.

The Yooz.me project in Scotland is a good example of such commitment. The founder Ian Strachan spent a short time determining whether it could be feasible and then committed to the project. He successfully secured support and has run Scotland’s first large surplus building product business for the last four years. Perhaps this is no different from those who set up architectural salvage businesses in the 1970s?

**Guidelines and help available**

For those wanting to repeat what has been successful elsewhere, there is clear guidance available. For example, the Community Wood Recycling Network and Men-in-Sheds websites both give clear guidelines on how to start up an enterprise, and guidance is also available at www.reiy.net. The best start can be to make contact with and visit an existing organisation. This can help you and your team to finalise your plans alongside securing wider community support (e.g. contacting your local council, holding a public meeting) and applying for start-up funding and identifying suitable premises.

**Securing a site and proving a new enterprise**

Starting a reuse organisation at scale involves a number of challenges. There can be benefits from involving different people at each stage as the idea is transformed into a viable enterprise. Challenges include:

- **Securing the site.** At an affordable cost, with security of tenure and in the right place.

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• **Raising funding.** Writing funding applications and securing support from national organisations or the local council, businesses with money or in-kind assistance can take a significant amount of time. If a site, use of assets or manpower cannot be provided free-of-charge, the scale of funding required can increase significantly.

• **Practical aspects.** Collection, storage and warehouse operations, marketing and branding, administration and finance systems all require time and effort to get right.

• **Driving force.** Generally there will be a person or group who are committed to make the project happen. Without this, the above challenges may appear insurmountable. For building product reuse, the driving force in the US was motivated by providing the resources and finance to construct homes for those not able to afford other options. In the UK eco-projects including BedZED in Sutton\(^\text{18}\) and the Arcola Theatre in London\(^\text{19}\) created a pull which helped secure reused building product supply.

**Ongoing success and community presence**

Most successful enterprises have both a committed workforce and leadership. This is key as running a reuse organisation is the sort of enterprise that is likely to sustain challenges once it has started up. For example, since the 2008 Business Case was written by BioRegional, the following changes have occurred in the UK:

• **Recession.** This has changed prices and availability of premises, although the effect has not been consistent across the UK. The recession has also impacted on the relative availability of surplus materials from the construction industry and created demand for products at cheaper prices by the DIY sector.

• **Changes in funding for providing new employment opportunities.** Changes include the end of the Future Jobs Fund and the introduction of Apprenticeships, together with the ability of individuals to be able to afford to take this work.

• **Changing priorities for funders.** Priorities have changed for funders such as the government and the National Lottery.

• **Removal of mandatory requirement for site waste management plans.**

• **Reduced CSR benefit for construction firms.**

• **Reduced potential for training revenue.**


• **Different targets for reuse within different local authority areas.** Some local authority areas are specifically targeting reuse as an opportunity for creating new enterprises and carbon savings – such as Brighton and Hove Council who now employ a Reuse Manager.

• **Continuing increase in number of community wood recycling projects.**

• **Mergers and acquisitions reducing significantly the number of longstanding architectural salvage businesses in the UK.**

As a result, not all of the organisations that BioRegional worked with in 2009 and 2010 to start up construction reuse projects are still focusing on this area. Some have shifted to furniture. Others are still operating at a small scale, alongside other activities, such as furniture reuse. Some have survived and grown (Recipro, Yooz, community wood recycling enterprises).

To deal with such challenges (as well as local ones, and those internal to the organisation) it is crucial that the project leaders, including both the overall manager and directors (or trustees if the organisation is formed as a charity) provide strong leadership, not just to start the project, but going forward. This will generally include retaining a high profile with key stakeholders, including the local community, to make sure that opportunities are not missed and problems are addressed quickly.

**Conclusion**

Many new reuse enterprises are starting up across Europe, helping a transformation in how resources move around locally. With increased support, such enterprises could have an even greater impact – as highlighted by the £400 million of untapped reuse potential from household goods each year in the UK alone\(^\text{20}\). New reuse enterprises are delivering many different community outcomes from repairing bikes to increase access to work, to Men-in-Sheds projects that repair furniture and reduce social isolation. This can give us hope that a transition towards sustainability, with an increased focus on and scaling-up of reuse, is possible.

*Time to get busy, such a lot to do. Building and fixing till it's good as new.*

*Can we fix it? *... *Yes, we can!*  

*Bob the Builder*

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\(^{20}\) See Routes to Reuse: maximising value from reused materials (LGA, 2014)

[http://www.local.gov.uk/documents/10180/5854661/LGA+Routes+to+Reuse+FINAL+FINAL.PDF/5edd19ba-7c13-47c5-b019-97a352846863](http://www.local.gov.uk/documents/10180/5854661/LGA+Routes+to+Reuse+FINAL+FINAL.PDF/5edd19ba-7c13-47c5-b019-97a352846863)
Securing a site / site agreement

This is a major constraint to new projects. Considerations to be made include:

- **Size.** A site of 10,000-20,000 sqft is proposed to start a building product reuse centre. However, a smaller site will still be sufficient to trade in a more limited product range, including furniture reuse, scrapstore model, timber reuse and recycling, or to focus on reused products for community benefit on site, such as for a Men-in-Sheds project.  

- **Rent.** A site is generally required at sub-market rent or purchased within the limits of finance available, particularly in the South of England or in cities where commercial rents are higher.

- **Length of agreement.** A reasonable lease agreement, such as 5 years with a 3 year break clause, is considered as a practical minimum for a new project.

- **Second site.** A second site may be taken out on a short term lease, as set out at [www.meanwhile.org.uk](http://www.meanwhile.org.uk). This is not considered practicable for a main site, but could be useful to increase storage space in the short term. Such an arrangement was agreed between Newbury Community Furniture Project and the landlord of the industrial estate (New Greenham Park) where their main site is located.

- **Public sector land.** A site may be secured from a local authority or public sector partner. Local authorities often own lots of properties, some of which may be empty. A local council will have access to the record of all its assets and may be able to provide useful support to find and secure an appropriate local site.

- **Ownership.** There is often greater security if a site is owned by the community organisation. Assets can be 'quirked' or transferred from private to public sector. Details can be obtained from Locality in England and The Development Trust Association in Scotland and Wales.

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21 See [www.frn.org.uk](http://www.frn.org.uk), [www.childrensscrapstore.co.uk](http://www.childrensscrapstore.co.uk), [www.communitywoodrecycling.org.uk](http://www.communitywoodrecycling.org.uk) and [http://menssheds.org.uk](http://menssheds.org.uk).


23 See [locality.org.uk/our-work/assets/](http://locality.org.uk/our-work/assets/)

24 See [www.dtascot.org.uk](http://www.dtascot.org.uk) for Scotland and [www.dtawales.org.uk](http://www.dtawales.org.uk) for Wales.
Planning Permission

This is similar to that required for a salvage company or furniture reuse charity. As reuse enterprises are not waste businesses, they do not need to be designated as waste sites by the local council, but should approach the Environment Agency to be exempt from a waste permit. However, permission for vehicle movements (e.g. 7.5 tonne truck) and retail from sites will restrict potential to be located in industrial parks or residential areas.

Marketing

Opportunities include the following:

- **A launch event.** Preferably held in the period from March to October so it ties in with the 'DIY season'.

- **Business cards and flyers sent to contractors.** Referrals can be made from contractors already served by other ReIY centres through the network.

- **Construction training events.** Via existing training providers.

- **Contacts with clients.** This could involve local councils (to engage term maintenance contractors), housing associations (including engaging contractors used for new build and refurbishment) and trade associations (e.g. Federation of Master Builders, local Federation of Small Business or Chamber of Commerce). Profile could also be raised with professionals (e.g. ICE/RIBA branch).

- **Promotion through sustainability networks and local councils.** It is useful to agree co-promotion with existing reuse enterprises (e.g. charity shops, furniture reuse) and through regional networks, such as the London Reuse Network. Some councils support area-wide promotion of reuse, and all will have different opportunities based on the way they already help and promote reuse projects.

Training

The ReIY centre is designed to be reuse-led with training as an integral part of achieving financial sustainability. Two distinct aspects of training are proposed:

1. **Training opportunities for those out of work, education or training**
   The store will take on volunteers/trainees who will gain experience of employment and gain skills in a trade through working at the centre. To gain work on a construction site in the UK as a self-employed person (which make up around 90% of the construction industry) requires

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25 See the Surrey Reuse Network: [www.surreyreusenetwork.org.uk](http://www.surreyreusenetwork.org.uk)
a CSCS card\textsuperscript{26} and an NVQ or similar. The store will take new-starts on and give them the training needed to enter employment in the construction sector. The ReIY network can offer support in setting up and accrediting as a training provider. While employment of those who are volunteers/on New Deal is expected, the delivery of NVQ training is considered something for year 2 of operation once reuse collections and sales have been established. This approach is consistent with that for the Furniture Reuse Network\textsuperscript{27}.

2. Acting as a training centre for sustainable living/business/construction
Training in reuse and effective/advanced ‘site waste management’ for construction firms will encourage firms to use the reuse service that the centre offers. Training in eco-building and sustainable ‘retrofit’ (to improve energy efficiency of existing homes) will help increase footfall of potential ReIY customers into the centre. Both of these training courses can be offered with courses already developed\textsuperscript{28}. Opportunities in this area tend to change depending on how government chooses to incentivise sustainable construction\textsuperscript{29}.

\begin{figure}[h]
\centering
\includegraphics[width=\textwidth]{image.jpg}
\caption{Senior citizens volunteer at the Madison Country Restore, USA}
\end{figure}

\textsuperscript{26} Basic health and safety and site access qualification – see http://www.cscs.uk.com/
\textsuperscript{27} See http://www.frn.org.uk/training-for-volunteers.html
\textsuperscript{28} See http://www.parityprojects.com/professionals/training/ who have developed the first suite of BTEC modules for low energy refurbishment in the UK
\textsuperscript{29} For example, the UK government ended the requirement for Site Waste Management Plans in England in December 2013, meaning substantial training opportunities associated with the Plans were no longer needed.
Legal and Compliance

1. Informing the Environment Agency. There is a need to inform the Environment Agency to confirm that the plans comply with legislation. Details of how this was done for the RE:BUILD pilot in Croydon are included below.

2. Warranty for reuse. Generally this is not a problem, even for reclaimed rather than surplus new materials. For details see the WRAP Reclaimed Building Products Guide30.

Health and Safety and Operations Management

It is important that a site complies with H&S management and all persons employed operate in a safe way. This aspect is not a show stopper but must be budgeted for and included in operations management plans.

Pricing Structure – Collections and Sales

A standard pricing structure for collections has been adopted for the initial ReIY centres and wood recycling projects across the UK. This is around £15/cubic metre for timber and £20/tonne for mixed/bulky/heavy materials (2010 prices). A minimum price for collection of 1-1.5 tonnes is proposed at around £30. Collections are proposed at this standard rate across the UK, consistent with the approach taken by furniture reuse operations and community wood recycling enterprises.

The aim of the collections pricing is to cover collection costs while remaining competitive (slightly cheaper) than skip hire. Collections from further away will receive higher charges, or will be limited to cases where collection costs can be easily recovered through product sales.

Items will generally be priced cheaper than surplus new products from wholesale builders merchants in order to attract business and recover costs. Items that do not sell after a certain period of time may be further discounted to ensure that warehouse space is continually freed up to receive new collections.

Contact for support

Jonathan Essex
jonathan.essex@bioregional.com
0208 404 4249

APPENDICES

APPENDIX A - ReIY (Reuse It Yourself) store and network principles

ReIY stores aim to create a financially sustainable business by:

- Selling high quality affordable surplus building products to builders and DIY enthusiasts;
- Partnering with the construction industry to support companies to reduce carbon emissions, waste and resource depletion;
- Providing genuine opportunities to gain skills and meaningful employment, enabling everyone to make a positive contribution to the local economy.

Members of the national ReIY network have pledged a commitment to the following guiding principles/objectives that define a ReIY Store:

1. **Not for profit.** Operational surplus shall be reinvested in the enterprise.

2. **Committed to people.** Providing training, vocational development and meaningful occupation.

3. **Committed to reduction of waste and carbon emissions.** Always pursuing reuse above recycling.

4. **Minimise mileage.** Operated locally to maximise carbon emissions savings. Emissions from transportation are kept lower than embodied carbon of the product.

5. **Committed to quality.** Provide a professional collection service and retail high quality products.

6. **Committed to collaboration.** Distinct from, and not impacting on, the viability of any existing architectural salvage, wood recycling and social enterprise operations by focussing on lower value reclaimed and unused excess materials. This means stores will trade as local as possible rather than competing with other members of the network across a larger area.

7. **Committed to the network.** Contributing to the national ReIY network, relevant regional reuse networks and supporting other members.
APPENDIX B - Considerations for waste management

This section summarises current waste management legislation and its implications for Building Materials Reuse Centres, based on experience establishing procedures for a pilot in Croydon in 2009-2010.

For specific guidance on permits and exemptions, the Environment Agency (EA) recommend that individual projects should speak with their local EA environment officer, who organises permits and licensing for each site. These are generally not a problem and were given for the ReIY Croydon pilot site without any delay.

However, we advise that it is best not to just use a waste permit exception as the basis for operation, as this may lead items collected to be classified as waste, which means they then must be reclassified as products for resale. Items received should be classified as donations, with collection charges made seeking to cover the collection costs alone. This was documented for collections to the ReIY Croydon pilot with ‘material transfer notes’ when goods were received. These are not used as a legal requirement, but as a way of creating an auditable process and to track goods through the store.

Summary
The law classifies materials that are to be discarded as waste. According to the EA, you can only recycle something that is classified as waste.

In the first instance, this is the key point for a reuse store to intervene. Ideally a construction site should set aside reusable products in a designated area for reuse collection. By doing so, the materials are never discarded and are less likely to need to be treated as a waste. This is particularly the case for surplus (unused) materials.

Contractors may require a Waste Transfer Notice, which means they become waste. Where materials have been used (opened packs, offcuts, and reclaimed), they are also more likely to need to be treated as waste at the point of collection.

Reuse centres should explore registering for a waste carriers certificate or exemption for vehicles (see transport section below) and a simple exemption, under paragraph 15 (see below), for the handling and storage facilities.

Any construction reuse activities working with waste are regulated under Environmental Permitting Regulations\(^\text{31}\). A reuse store will either need a permit or an exemption for both material storage and material transport. For Scotland, similar rules exist and are best checked with the Scottish Environmental Protection Agency (SEPA).

\(^{31}\) These have replaced Pollution Prevention and Control (PPC) and Waste Management Licensing (WML) regulations.
1. **Exemptions for waste operations**

Some waste operations are exempt from the requirement to have an environmental permit, but they do still need to be registered. Exemptions are either simple or complex. Simple exemptions are considered low risk - they need to be registered with the EA, but do not cost. This is the category that is expected for a building product reuse centre, and was the case for registering the ReIY Croydon pilot.

Permits are required where no exemption is possible. Standard permits are available for waste transfer stations and materials recycling facilities. Reuse centres will not generally require permits of this type.

**Simple exemptions**

Simple exemptions may apply to the following ReIY activities:

<table>
<thead>
<tr>
<th>Paragraph</th>
<th>What it says</th>
<th>Applicability</th>
</tr>
</thead>
</table>
| **15**    | • Beneficial use of waste  
• Allows waste items and materials to be put to use without further treatment provided their use does not also involve their disposal  
• Allows storage of the recovered objects and materials prior to them being put back into use  
• This exemption cannot be used where the type of activity is already covered by other exemptions with restricted limits i.e. Paragraphs 7, 9, 10, 11, 19 or 25 | • Only applicable if paragraph 11 is not applicable                                                      |
| **17**    | • Storage of waste in a secure place  
Applicable types of waste for ReIY:  
• 17 01 01 to 17 08 02 except for 17 03 02, 17 05 04, 17 05 06 and 17 05 08 (non-hazardous construction and demolition waste articles which are to be used for construction work and are capable of being used in their existing state)  
• <100 tonnes, <12 months  
• 15 01 09, 17 02 01, 1702 04*, 20 01 37*, 20 01 38 (wood including telegraph poles and railway sleepers)  
• <100 tonnes, <12 months  
• 20 01 27*, 20 01 28 (paints, excluding specialist and industrial paints, wood preservatives, aerosol and spray paints, inks, adhesives and resins, pending re-use of the | • Applicable                                                                                           |
<p>| | | |</p>
<table>
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<th></th>
<th></th>
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</tr>
</thead>
</table>
|   |   | paint)  
|   |   | • <10,000 tonnes, <6 months  
| 4 |   | Cleaning, washing, spraying or coating of waste packaging and containers  
|   |   | • <1,000 tonnes of used packaging / week  
|   |   | • Excludes activities listed in Part B of Section 6.4 of the Environmental Permitting Regulations  
|   | 11 | Treatment of waste for the purpose of recovery  
|   |   | • Allows limited volumes of certain separated waste materials to be treated – e.g. by sorting, crushing, shredding, densifying  
|   | 14 | The manufacture of finished goods from waste  
|   |   | • Metal, plastic, glass, ceramics, rubber, textiles, wood, paper, or cardboard can be manufactured into finished goods  
|   |   | • These finished goods can also be stored at the site of manufacture  
|   | 13 | Manufacture and treatment of construction materials and timber products  
|   |   | • Waste which arises from demolition, construction work, tunnelling or other excavations can be manufactured into: timber products, straw board, plasterboard, bricks, blocks, roadstone or aggregate  
|   |   | • Manufacturing of soil or soil substitutes is permitted from waste  
|   |   | • The manufacture is carried out at the place where either the waste is produced or the manufactured product is to be applied to land  
|   |   | • <500 tonnes / day  
|   | 18 | Storage of waste in a secure container  
|   |   | • Container must be <400m² (for most of the materials listed)  
|   |   | • BMRC materials it might apply to:  
|   |   | o plastics and plastic packaging  
|   |   | o cans and foils  
|   |   | o glass  
|   |   | • Only applicable if required to store materials listed  
|   |   | • Applicable if the washing of materials is an activity at a reuse store  
|   |   | • If this is applicable then Paragraph 15 can no longer be used  

Complex exemptions
These cost around £500 / year.

<table>
<thead>
<tr>
<th>Paragraph</th>
<th>What it says</th>
<th>Applicability</th>
</tr>
</thead>
<tbody>
<tr>
<td>19</td>
<td>• Waste for construction</td>
<td>• This may be more applicable to those who want to use the materials rather than the building material reuse centre</td>
</tr>
<tr>
<td></td>
<td>• Storage &lt; 6 months and &lt; 50,000 tonnes of waste</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Reuse of materials</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• This is applicable for the following building material reuse centre materials:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Concrete, bricks, tiles and ceramics</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Concrete</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Bricks</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Tiles and ceramics</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Mixtures of concrete, bricks, tiles and ceramics</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Wastes from the mechanical treatment of waste</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(for example sorting, crushing, compacting, pelletising) not otherwise specified</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Minerals (for example sand, stones)</td>
<td></td>
</tr>
</tbody>
</table>

2. Requirements for transportation
If the reuse centre transports waste, they will need to register as a waste carrier. A single registration with EA or SEPA will cover carriage of waste throughout Great Britain. Exemptions are available for some types of waste, but not construction waste. Waste collection authorities, charities and voluntary organisations can apply for an exemption.

If the reuse store deals with waste and arranges for someone else’s waste to be disposed of or recovered, it must register as a waste broker. This includes arranging for someone else’s waste to be disposed of or recovered if you are the operator of the authorised site that the waste is going to.

3. Requirements for those transporting waste to the reuse store
Registration as a waste carrier is often not necessary for those transporting waste to the reuse store, but registration with the EA would be required if the materials transported are building or demolition waste.
If the reuse centre returns containers or other materials to a supplier for them to be reprocessed or disposed of, then the reuse centre must check that the supplier is a registered waste carrier (or exempt from this). The reuse centre should also check that they hold an environmental permit (England and Wales) or a waste management licence (Northern Ireland and Scotland) if applicable. These checks involve seeing their certification and need to be done regularly, as they might expire or be revoked.

**Controlled waste transfer notes:**
All transfers of waste must be covered by a waste transfer note that is signed by the transferor and transferee. Copies of all transfer notes must be kept on file for two years. These need to be printed by the reuse centre. Repetitive transfers can use a ‘season ticket’, but this requires the transferred waste to remain the same over the period it covers.

For more information see [www.environment-agency.gov.uk](http://www.environment-agency.gov.uk) and [www.netregs.gov.uk](http://www.netregs.gov.uk).

4. **Applying for a simple waste exemption for material handling (based on experience for the Croydon ReIY pilot)**

To receive a simple waste exemption the reuse centre needs a quality protocol to be prepared for each waste stream that is intended for collection, along similar lines to a WRAP protocol or WEEE re-classification process used for shipping of electrical items from civic amenity sites abroad. The protocol should take the form of a tick list, as set out in the example table below. The centre must also have a working plan that contains procedures for what to do should unacceptable material be received at the site.

This process requires a simple ‘Material Movement Note’ form to be filled in by an employee of the reuse centre when items are picked up or dropped off at the site. A sticker should be placed on each item to identify which site it has come from, the date it was picked up and the signature of the person carrying out the protocol confirming that it was suitable for reuse. This ‘Material Movement Note’ will be similar in style to a waste transfer note and should be formally issued when materials are picked up so it can act as a receipt and inventory for the materials that are collected and subsequently handled. This must provide a transparent and auditable procedure.

<table>
<thead>
<tr>
<th>Protocol step</th>
<th>Details</th>
<th>Pass / fail</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Items have been stored at all times separate from waste materials, in an appropriate manner i.e. no signs of water damage, dirt etc.</td>
<td>Not likely to be damaged or confused with waste.</td>
<td></td>
</tr>
</tbody>
</table>
2. Each unit is in an appropriate container in a suitable condition with a lid that can be opened and resealed easily. | No dents, won't leak, secure lid.
---|---
4. Product type is identified by label or other means. Required information, e.g. hazardous labels, is intact and legible. | Visual inspection or by paperwork.
5. Useful quantity and quality - more than half full, not separated or contaminated. Tubes of mastic etc. should be full and unused. | Visual inspection.
7. No other likely hazards to humans or the environment, e.g. dented tins with sharp edges. | Visual inspection.

**Table 1. Paint checklist example**
We are a new professional service which collects surplus reusable building products from construction sites, dusts them off and retails them back to the building trade and DIY enthusiasts.

Our service in three easy steps:

1. **Separate and store your reusable materials** See our guidelines for the materials we collect and how best to store them. For unlisted items in good condition, just call us to discuss collection.

2. **Call to arrange a collection** If you’re running out of space, our collection team will usually arrive within 48 hours. To ensure the quality of the materials we may ask you to email a photo.

3. **Reap the benefits** Become a Regular Reuser and we’ll let you know how much waste and carbon emissions you’ve saved for use in CSR reports. We’ll also give you access to local and national press opportunities.

**Costs**

We’re competitively priced compared with other waste disposal routes. At £xx per cubic metre for wood and £xx per 1.5 tonne for all other products that’s great value compared with skip hire charges. Our minimum collection is 1.5 tonne or 3 cubic metres of wood.

**Collections Area**

We cover the Council Areas of: **To add.**

For collections outside of these areas, call us to discuss.

**Contact Us**

Add details here.
# Items we collect

Acceptable used and surplus building products include:

<table>
<thead>
<tr>
<th>Item</th>
<th>Storage method and condition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bathroom Suites</td>
<td>Unused toilets, used sinks</td>
</tr>
<tr>
<td>Bricks and Blocks (non granite)</td>
<td>Stacked on pallets (shrink wrapped)</td>
</tr>
<tr>
<td>Granite</td>
<td>Stacked on pallets or bagged</td>
</tr>
<tr>
<td>Cabinets</td>
<td>Stacked and dry, clean, up-to-date, undamaged</td>
</tr>
<tr>
<td>Brick and Blocks (non granite)</td>
<td>Stacked on Pallets, and dry, min 30 sqft, unused only</td>
</tr>
<tr>
<td>Cladding</td>
<td>Stacked and dry, unused only</td>
</tr>
<tr>
<td>Cement Bags</td>
<td>Unopened, stacked on pallets, well within date</td>
</tr>
<tr>
<td>Doors</td>
<td>Bagged</td>
</tr>
<tr>
<td>Electrical, lighting fixtures, parts and supplies, and ceiling fans.</td>
<td>Stacked</td>
</tr>
<tr>
<td>Fencing</td>
<td>Stacked, at least 6’ lengths</td>
</tr>
<tr>
<td>Flooring - Wood</td>
<td>Stacked on pallets</td>
</tr>
<tr>
<td>Flooring - Ceramic Tiles</td>
<td>Stacked or rolled, palletised or bagged, min 30ft</td>
</tr>
<tr>
<td>Flooring - Vinyl</td>
<td>Bagged or Boxed</td>
</tr>
<tr>
<td>Hardware, knobs, hinges, locks, nails, cabinet pulls, nuts, bolts, screws.</td>
<td>Bagged, boxed or wrapped</td>
</tr>
<tr>
<td>Insulation</td>
<td>Stacked and dry, not chipped or scratched</td>
</tr>
<tr>
<td>Kitchen Units</td>
<td>Stacked and dry</td>
</tr>
<tr>
<td>Millwork/trim, wood casing and base (clean), vinyl base.</td>
<td>Lidded containers</td>
</tr>
<tr>
<td>Paint, stain and varnish</td>
<td>Stacked on pallets</td>
</tr>
<tr>
<td>Paving (Non sandstone)</td>
<td>Stacked on pallets or bagged</td>
</tr>
<tr>
<td>Paving, Sandstone</td>
<td>Bagged or Boxed</td>
</tr>
<tr>
<td>Plumbing, fixtures, current parts/supplies</td>
<td>Stacked on pallets</td>
</tr>
<tr>
<td>Roofing, 3 bundles of shingles minimum</td>
<td>Unopened, stacked on pallets</td>
</tr>
<tr>
<td>Sand Bags</td>
<td>Stacked undercover, min 6’ lengths, nail free</td>
</tr>
<tr>
<td>Steel Lintels</td>
<td>Stacked</td>
</tr>
<tr>
<td>Timber</td>
<td>Stacked undercover</td>
</tr>
<tr>
<td>Tools, hand, garden (no power tools)</td>
<td></td>
</tr>
<tr>
<td>Windows, insulated glass, seals intact, no sashes accepted</td>
<td></td>
</tr>
</tbody>
</table>

Got an unusual or unlisted item in good condition? Call us to discuss collection.

**Sorry we cannot collect the following items:**

- Single pane windows
- Tub surrounds
- Blinds
- Used carpet
- Power tools
- Wallpaper
- Used toilets
- Lead based paint materials
- Toxic materials
- Fluorescent lighting