

# WST-PS-01

Position Statement: Use of unbound incinerator bottom ash aggregate in construction

## November 2025

# Purpose

This position statement applies to the use of unbound Incinerator Bottom Ash Aggregate (IBAA) from municipal Incinerator Bottom Ash (IBA) in certain construction applications.

Unbound IBAA includes IBAA in hydraulically-bound mixtures (HBMs). A HBM is where IBAA is mixed with water and a binder such as cement to form a mixture which then sets.

If you comply with the conditions, SEPA will not require an authorisation under the Environmental Authorisations (Scotland) Regulations 2018.

# Conditions

* The IBAA must be manufactured from non-hazardous IBA only. Classification is determined using a combination of “Guidance on the classification and assessment of waste – WM3” and the “ESA Sampling and Testing Protocol to assess the status of Incinerator Bottom Ash – Jan 2018”.
* The IBAA must be manufactured in accordance with the relevant aggregate standards and specifications, for example, BS EN 13242 or any revision of that standard.
* IBAA may be used in the following applications;
	+ Subbase or General Fill in road and pavement construction
	+ Construction Platforms and Embankments covered with a low permeability surface
	+ Pipe Bedding
* IBAA must not be used, or supplied for used, underneath any residential building or garden.
	+ The total area of IBAA placement in any single project must be less than 10,000m2. Larger projects can be approved on a case-by-case basis via an application to SEPA.
* The IBAA must not be placed directly into groundwater or within 1m of the water table.
* IBAA must not be stored or used within 10m of surface water.
* IBAA must not be stored or used within 50m of any spring or well, or any borehole used to supply water, including private water supplies.
* IBAA must not be stored at the place of use for longer than 6 months.
* Waste Transfer Notes are not required but suppliers of IBAA must keep records of the following information and make them available for inspection by SEPA on request:
	+ Name and location of the project to which IBAA has been supplied
	+ Date of supply / use
	+ Quantity of IBAA supplied
* Suppliers must provide to each user a statement that the material meets the relevant standard for an end use specified in this position statement and has been supplied only for that use.

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