

Response ID ANON-4WJ1-GM1B-D

Submitted to **Food Waste Management in Scotland**
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Introduction

1 Please provide your name

Name:

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2 Please provide your email address

Email:

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3 What is your organisation?

Organisation:

Bio-based and Biodegradable Industries Association

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4 Do you agree that the obligations listed in the 1. Food Waste Producer section of the guidance are appropriate?

no

If you do not agree or are not sure, please tell us why:

It is not clear why SEPA has chosen to specify plastic packaging in this section. The issue presumably is that one of the main aims of this Guidance and changes to the End of Waste Position is to reduce the amount of plastic fragments in compost and digestate.

Packaging, whilst a major source of these fragments, is not alone as a source of plastic. Plastic is used in a number of non-packaging applications which are relevant to food waste production, e.g. agricultural film, twines and clips; gloves used for hygiene in food manufacturing; cutlery, straws, plates, bowls and paper cups (lined with plastic) in food service; identification stickers on fruit and vegetables; tea bags, coffee filter papers and coffee pods (capsules); and waste bags. Technically none of these applications are packaging but all are likely to be both made mainly of plastic and be delivered to organic recycling facilities with food waste.

All of these products are widely available in the market as biodegradable and compostable according to relevant international standards. Due to a lack of standards, it is common to apply the Harmonised EN 13432 for biodegradable and compostable packaging to all such products. At present, the Guidance, by omitting reference to all suitable non-food products except waste bags, essentially prohibits the use of biodegradable and compostable products and packaging in this sector.

We would like to stress to SEPA that it is not just waste bags but a whole raft of highly relevant paper, board and plastic (and combinations e.g. plastic coated paperboard cups) products and packaging which enable higher levels of contaminant free food waste to be collected due to their inherent biodegradable and compostable properties and that these should be given recognition within the guidance. We always promote the use of independent certification schemes and labelling to demonstrate product compliance with standards such as BS EN13432 and recommend these also form part of the Guidance.

Of note, a number of certifications also exist for biodegradation in non industrial conditions, e.g. home composting and soil. The latter is particularly relevant here as no matter how good the depackaging and post production presses and screening technology claim to be it is inevitable that some fragments will be delivered to the environment through the compost and digestate. We would thus advocate the use of soil biodegradable plastics where the volumes are such that they are most likely to find their way into compost and digestate, local authority food waste collection bags being one such example.

Indeed, as the Italian example clearly demonstrates, as food waste collection volumes increase, so do contaminants. This is why in 2010 Italy (whose food waste collection had risen from zero in 2000 to 3 million tonnes) chose to introduce the legally binding obligation to collect food waste with compostable bags (either plastic or paper). Consequently contamination levels began to decline, and currently have averaged out at around 3-4% of food waste collected- a level which can be handled by IVC or AD plants and which results in virtually zero contaminants in compost and digestate.

The Guidance does not mention secondary or tertiary packaging e.g. wrapped boxes of tinned food on a pallet, or packaged food presented in bags, it only refers to primary packaging. Thus if it is SEPA's intention that no secondary or tertiary packaging is to be used for transport it must be clearer within the Guidance.

In sections 1.7 and 1.8 on bags, it is not clear why SEPA is stipulating the maximum volume of a bag or sack. It is common for a 240l wheeled bin or larger rigid container to contain a bag or liner to avoid the need for washing of the reusable container, thus by limiting the size of bag, the Guidance is making an additional requirement on the producer to wash bins. Bag size should only be limited by H&S and safe lifting weights. BS EN13592 gives details on bag performance according to load, this would be a useful reference within these sections.

Regarding the colour of the bags, whilst it is agreed that black bags should not be used and why clear sacks would seem an obvious preference, it is not always suitable. For example, many biodegradable and compostable bags are naturally opaque or light green, whilst the food manufacturing industry use blue plastic bags as standard. Therefore we would recommend the guidance only stipulate that black bin bags not be used.

In section 1.8, given the target destination is specifically IVC, the recommendation should be stronger to avoid the delivery of non-biodegradable plastics to facilities. A suggestion for rewording this is: "food waste going to in-vessel composting treatment may be collected separately or co-collected with garden waste and if either or both fractions are bagged, they should only be collected in certified EN13432 biodegradable and compostable bags. Non-biodegradable plastic bags should not be used."

5 Do you agree that the obligations listed in the 2. Food Waste Collector section of the guidance are appropriate?

yes

If you do not agree or are not sure, please tell us why:

For response regarding the use and type of bags (2.4, 2.5) please see above.

2.6, organic waste recycling bins should be frequently checked / checked every time not just "regularly", regularly could be interpreted as once a year

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6 Do you agree that the obligations listed in the 3. Food Waste Treatment Facility section of the guidance are appropriate?

yes

If you do not agree or are not sure, please tell us why:

7 Do you agree that the obligations listed in the 4. Farmer, Contractor or Land Manager involved in the Application of Food Waste Derived Anaerobic Digestate or Compost to Agricultural Land section of the guidance is appropriate?

yes

If you do not agree or are not sure, please tell us why:

Injectors are only used for whole digestate / liquors and not for composts or separated fibres. The Guidance would also benefit users by signposting them to the ZWS market uses of compost and digestates web pages and the DC Agri information.

The Animal By-Products Regulations are not optional when applying food waste derived composts and digestates to land, thus the first sentence in 4.5 should read "Understand and comply with..."

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8 Do you agree with the proposed final physical contaminant (including plastic) limit in compost of 50% of those specified in the PAS100 standards?

yes

If you do not agree or are not sure, please tell us why:

We welcome all moves to reduce the amount of plastics entering the soil and thus the wider environment.

The limits in PAS 100 are already strict and these limits may prove a major test for the industry. Compost producers are heavily reliant on receiving low contaminant feedstocks in order to produce quality composts and have difficulty in having this message fed back through the supply chain. It should be noted that unless clean feedstocks are received the processes to remove contaminants, particularly plastics, result in a loss in organics. Thus as extraction increases, losses increase. Therefore, unless there is a reduction in front-end contamination from municipal sources, it is likely that recycling rates will be impacted. Further support in terms of communications and multi-stakeholder messaging would thus be welcomed.

9 Do you agree with the proposed phased implementation timescale presented in Table 1 of the Regulation of Outputs from Composting Processes regulatory position statement? i.e. 66% of PAS100 levels by 1st April 2017 and 50% of PAS100 levels by 1st April 2018

yes

If you do not agree or are not sure, please tell us why:

Yes but the phasing should apply to different markets

10 Do you agree that compost which exceeds the revised limits for physical contaminants (including plastic) will not be suitable for application to agricultural land under an exemption from waste management licensing (i.e. paragraph 7(1) exempt activity)?

no

If you do not agree or are not sure, please tell us why:

Given the lack of presented information (economic or environmental) on why these new limits are being consulted upon to then ask for agreement they are also applied to materials which are being applied to land as waste (not recycled) it is difficult to respond. The core markets for exempt applications are not the prime agriculture working under meat assurance schemes and so the specific rules should not be applied across the board. Limits should be set according to the application and environment of application.

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11 Do you agree with the proposed final physical contaminant (including plastic) limit in digestate of 8% of those specified in the PAS110 standards?

yes

If you do not agree or are not sure, please tell us why:

The general comments on question 8 apply to PAS110 as well as PAS100.

In addition, we would ask that SEPA work with industry to further investigate the soil biodegradation rates of plastics, their standardisation and identification.

The vast majority of wet AD facilities in mainland Europe integrate a post digestion aerobic phase. Apart from the benefits this brings in terms of digestate

management and that it addresses many of the negative impacts of whole digestate application identified in the DC Agri work (N losses to the atmosphere / aquatic systems, increasing soil compaction (increasing flood risk), earthworm population impacts) , it also enables the facilities to minimise the amount of residues being sent to disposal since any remaining organics and biodegradable and compostable materials which have been extracted will completely biodegrade. Given the requirement to increase extraction following the implementation of these new limits, there will be a likely reduction in local authority recycling rates and increase in disposal costs to processors. Ongoing consideration should thus be given to limiting the acceptable collection bag types to those which are compatible with more integrated, circular systems.

12 Do you agree with the proposed phased implementation timescale presented in Table 1 of the Regulation of Outputs from Anaerobic Digestion Processes regulatory position statement? i.e. 50% of PAS110 levels by 1st April 2017;25% of PAS110 levels by 1st April 2018 and 8% of PAS110 levels by 1st April 2019

yes

If you do not agree or are not sure, please tell us why:

13 Do you agree that digestate which exceeds these revised limits for physical contaminants (including plastic) will not be suitable for application to agricultural land under an exemption from waste management licensing (i.e. paragraph 7(1) exempt activity)?

no

If you do not agree or are not sure, please tell us why:

See response on compost under para 7.

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14 SEPA proposes to remove leather industry wastes from the list of acceptable inputs. Do you agree that this material should not be used as feedstock for anaerobic digestion?

don't know

If you do not agree or are not sure, please tell us why:

15 SEPA proposes to remove sludges from on-site effluent treatment from the manufacture, supply and use of fine chemicals and chemical products. Do you agree that this material should not be used as feedstock for anaerobic digestion?

yes

If you do not agree or are not sure, please tell us why :