

Response ID ANON-C3W8-BW34-5

Submitted to **Consultation on the Waste Management Plan for England**
Submitted on 2020-10-12 12:28:25

Introduction

1 Would you like your response to be confidential?

No

If you answered Yes to this question please give your reason:

2 What is your name?

Full Name:

David Newman

3 What is your email address?

email address:

dn@bbia.org.uk

4 Are you responding as an individual or on behalf of an organisation?

Individual or Organisation:

Organisation

Organisation Details

5 What is the name of your organisation?

Organisation Name:

BIO-BASED AND BIODEGRADABLE INDUSTRIES ORGANISATION

6 What type of organisation is it?

Organisation Type:

Industry

If other please specify:

Summary of the People and Organisations you Represent

7 Please provide a summary of the people and organisations you represent and where relevant who else you have consulted in reaching your conclusions.

Summary of people and organisations you represent:

BBIA represents producers of bio-based and biodegradable polymers and other plant-based feedstocks, converters of those polymers and feedstocks into compostable packaging and other products such as food service products; vendors and distributors of those products; and other biodegradable materials such as soil mulch, lubricants, coatings, surfactants, ingredients for the cosmetics and pharma industries and building blocks of the chemical industry. Such materials have in common lower GHG emissions footprints than traditional fossil fuel based materials in their production phase as well as defined end of life once used, often in a cycle that returns them to soil through a natural biodegradation process (in the case of packaging, industrial or home composting. BBIA represents 25 members and these responses include their comments.

BBIA members' activities can be understood in the wider context of the Bioeconomy. The UK strategy on Bioeconomy published in December 2018 indicates that the UK bioeconomy currently has a value of £220bn annually and employs some 5 million people directly and indirectly- including in farming. One of the four pillars of the UK strategy is to "Create the right societal and market conditions to allow innovative bio-based products and services to thrive" and includes plastic pollution as one of the societal challenges humanity faces. Plastic pollution of biowastes are one of the subjects of this paper.

For more information see www.bbia.org.uk

Question 1

8 Will the draft Waste Management Plan for England – when combined with the location specific guidance in waste planning policy - meet the requirements of Schedule 1 of the Waste (England and Wales) Regulations 2011?

Yes or No:

Yes

If you answered No to this question please give your reason:

Compliments to the personnel at DEFRA who worked on this plan, it is comprehensive and comprehensible.

We would emphasise that the "biosphere" tends to have less consideration than the "mechanosphere" in terms of recycling and outputs. We will discuss this later.

Question 2

9 Do you agree with the conclusions of the Environmental Report?

Yes or No:

No

10 Do you have evidence to support your view?

Yes or No:

Yes

If you answered Yes to this question please provide the evidence that supports your view and state which part or parts of the environmental report it relates to. Please include links to published evidence where relevant.:

The emphasis on the use of anaerobic digestion as the preferred treatment methodology is fine but the outputs from such treatment get scarce consideration. Outputs include liquid digestate heavy in nitrogen spread to soil. There are 74 references to soil protection in the Environmental Report and a key article is on page 102 which states that "The SEA assessment framework should include criteria relating to soil protection". We agree. However, the use of digestate on soil in England is not necessarily beneficial.

WRAP's report on the use of digestate (<http://www.wrap.org.uk/content/digestate-and-compost-agriculture-dc-agri>) "underline the high economic and environmental cost of applying it (digestate) when crops do not require nitrogen" and "that compost can increase soil organic matter more quickly than other organic materials."

The report showed lower earth worm concentrations (an indicator of soil health) when digestate was used.

From this it follows that the Environmental Report should lead to recommendations which address this potential imbalance- if food waste is to be directed towards AD we have to ensure the outputs have beneficial impacts. This would imply composting the digestate (with garden waste for example) and preventing the spreading of liquids with excessive N loads. Moreover, as the essential ingredient in improving soils is the need to build up organic carbon, composting has to be considered as the way to do this. AD does not supply organic carbon to soils yet this is the key component needed to ensure fertility long-term and soil health, as well as being a carbon sequestrator.

Further, evidence now available shows that plants are absorbing microplastics through root systems and these are entering the food we consume. For this reason, whether compost or digestate is applied to soil, plastics entering the treatment systems must be eliminated. This requires both clean collection systems as well as front end technologies to ensure plastics do not enter and leak through processes, as they currently are. The EA has estimated 100,000 ton p.a. of microplastics (minimum) are being spread to soils through compost and digestate and sewage sludges. Actions are required on all fronts to ensure there is a continual reduction in these pollutants to soil. The Environmental Report makes scarce mention.

Upload File:

microplastics in fruit and veg June 2020.pdf was uploaded

Question 3

11 Do you agree or disagree with the following statement: 'There will be no additional burdens for businesses, consumers and local authorities arising directly from the adoption of the Plan'

Agree or Disagree:

Disagree

If you disagree with the statement, please provide appropriate evidence to support your view.:

We cannot assume there will no additional burdens nor is it reasonable to do so. The Circular Economy has a cost. This includes higher costs for accurate collection systems, greater involvement of householders and businesses in providing clean and uncontaminated materials for collection and recycling, increased cost in ensuring the correct treatment of those materials and the cost of communicating and controlling such systems. The concept that everything should cost the same whilst needing to enhance quality, quantity and performance, is contradictory. We should not be afraid to say, "doing the right thing costs more." Otherwise, if the question were simply one of costs, we would continue to dump our sewage in rivers or our waste in open dumps as we did until 30 years ago. Moreover, those companies that will be liable for EPR and DRS costs will face increased burdens and rightly so. Our sector welcomes being able to fund EPR systems that return value to organic waste management so that compostable packaging can be correctly collected and treated. That is a burden.