

## REA key asks to the Government in support for the Organics Recycling sector

### Background

Biodegradable resources in the UK make up the largest fraction of household waste and, when landfilled they release considerable emissions of methane, a powerful greenhouse gas. The lack of appropriate policy drivers in place, especially in England, means that supply of wastes such as food wastes suitable for AD and composting in the UK will near capacity soon. The separate collection and treatment of biodegradable resources has grown over the last decade, but there is an estimated 8 million tonnes of available food wastes still being landfilled every year. With huge costs and environmental implications and the risk that the UK will fail to achieve its legally binding Waste Framework Directive recycling targets - let alone the more ambitious targets that are likely to be set within the upcoming EU Circular Economy Package, action is required now to effect change. Without additional policy measures and separation and collection infrastructure in place, the situation is unlikely to change.

### Sector Issues

#### **1. The Renewable Energy Association (REA) ask the Government to impose a ban on the landfilling of biodegradable resources and mandatory separate collections of food waste from the business and commercial sectors.**

Urgent action by Government is needed to maximise the amount of food wastes that is diverted from landfill and made into added value outputs such as renewable energy and biofertilisers / soil improvers.

It is essential for Government to ensure the collection, processing and distribution of products takes place in an energy efficient manner. There is no point in banning organic wastes to landfill if the alternative uses more energy.

Only government can set clear policies on how UK PLC manages its organic wastes to ensure there is a clear carbon benefit.

The purpose of banning biodegradable waste from landfill and having mandatory food waste collections is to:

1. make better use of a valued resource and assist in the production of renewable energy, contributing towards binding 2020 targets for Renewables under the Renewable Energy Directive,
2. encourage the separation of waste streams and their subsequent collection, giving certainty of feedstocks for treatment facilities and investment in infrastructure and job creation, and
3. protect the environment from the climate change impacts of landfilling biodegradable wastes.
4. Sequester carbon. Compost and digestate when added to soils as a nutrient source and soil conditioner in the agricultural arena assists in sequestering carbon. Research carried out in the USA by the Environmental Protection Service (EPA, our equivalent of the Environment Agency) estimates that centralized composting of organics results in net carbon storage **of 0.20 MTCO<sub>2</sub>E per wet short ton** of organic inputs composted and applied to agricultural soil.

As long as sufficient time is provided in transition to a landfill ban, forward visibility will assist investors and infrastructure planning to prepare for the policy change. Scotland has already embarked on this route and early signs indicate that good progress is being made in food diversion from landfill.

## **2. The REA calls for Local Authorities to improve the quality of biowaste collected and for a mandate for the collection of green waste from households, separately from non-biodegradable wastes.**

### **The importance of biowaste quality**

Improving the quality of source segregated biodegradable wastes (biowaste) delivered to composting and anaerobic digestion sites is essential to maintaining and increasing the markets for high quality composts and digestates that achieve product status, (i.e. composts compliant with the PAS 100 specification and Compost Quality Protocol, and digestates compliant with the PAS 110 specification and Digestate Quality Protocol).

The presence of physical contaminants such as plastic, metal, glass and other non-compostable / non-digestible items in biowaste collected and delivered to composting and anaerobic digestion sites can significantly undermine the quality of composts and digestates and reduces the confidence in and demand for composts and digestates in the market place. Cost and practical constraints limit the degree to which composting and AD facilities can remove physical contaminants from poorly segregated wastes. Increased awareness and education of the householders and within local authorities would greatly assist with ensuring feedstocks were suitable quality.

### **Charging for green waste collections**

Reduced tonnages of green waste are collected as a number of local authorities impose a charging scheme to recover some of the collection costs incurred. Published by the Department for Environment, Food and Rural Affairs (Defra) the statistics for the second quarter of 2014 show that the amount of waste recycled or composted by local authorities fell to 47.1%. We anticipate that reduction in tonnage will become even greater as more local authorities cease to separately collect green wastes for no extra charge.

The REA calls for a requirement that green waste is collected separately from any non-biodegradable wastes (i.e. 'green waste only' or 'green and food waste together'). This would minimise the placement of biodegradable wastes into residual waste bins and less would end up in landfill where it will produce methane, a potent greenhouse gas.

## **3. The Renewable Energy Association ask that the Government require that green and food wastes are processed in PAS100/QP or PAS110/QP facilities for the input material to be classified as recycled.**

PAS100 and PAS110 are quality specifications for composts and digestates. Materials certified to the Quality Protocol and PAS100/110 are classed as product, and no longer considered a waste. Therefore to enable input material to be classed as recycled, it should be processed in plants certified to these standards. The Scottish and Welsh governments have provisions in place that ensure that waste materials that are made into composts or digestates that don't achieve product status, will not be allowed to be reported as recycled in the household waste recycling performance figures. The Waste Policy Review released on 14th June 2011 confirms that composting is classed as recycling.

#### **4. The Renewable Energy Association would like the regulator for biowaste (the Environment Agency in England and Wales) to be more accountable for its actions and proportionate in its regulation**

There is currently a lack of clarity and transparency in the way the Environment Agency regulates the sector. Within the overall policy framework, there is considerable inconsistency of approach when interpreted by individual local officers. This often leads to an uneven playing field between operators and disproportionate requirements for some. The REA seeks a proportionate, fair, consistent and transparent regulation within the sector.

The REA would like to see the regulator focused on environmental protection and assist the industry to comply with permit requirements and willing to encourage sector innovation. We would like to see impartiality in the EA decision making framework. One way in which this could be achieved, at least in some cases, would be to involve independent, industry experts.

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