



OPINION IN RESPONSE TO THE EUROPEAN COMMISSION
GREEN PAPER ON THE MANAGEMENT
OF BIO-WASTE IN THE EUROPEAN UNION COM(2008)811 final

<http://ec.europa.eu/environment/waste/compost/index.htm>

INTRODUCTION

¹ The European Water Association, the EWA, is the non governmental organisation representing professionals working in water management throughout the European continent. It is recognised as the sector professional NGO by the European Commission. It has Members which are also involved in waste management. Bio wastes are often created as a consequence of good water management. Their disposal and use may have consequences for water management. The impacts and opportunities for bio wastes must also be considered alongside those for treated sewage sludge – also referred to as biosolids.

² The general view is that organic matter produced by society, as a by-product of its activities, should be considered as a potential valuable resource for soil fertility and land management. Recycling the carbon contained in organic matter contributes to climate change mitigation and recycling the nutrients, which will otherwise be discharged into the environment, saves costs of production and losses of mineral resources. There are issues of environmental and public health risks which need to be managed at the same time. It is important that each type of organic waste is regulated appropriately to mitigate risks and thus create an equal chance of success for the use of different types of waste. Different sources of organic resources can then compete on the basis of cost and service and not prejudice.

³ Thus the EWA encourages the European Commission to develop a clear overall strategy, which encourages safe, sustainable and welcome recycling of all organic resources, be they bio wastes, biosolids, agricultural wastes, industrial wastes or forestry wastes. The EWA is not advocating integrated regulation but it does advocate that the regulation of each sector should fit into a 'big picture' and it has previously submitted extensively on a similar basis in the context of biosolids management.

⁴ The EWA recognises that, for practical and economic reasons in some locations, the most sustainable way of dealing with many organic wastes may well be incineration.

⁵ The EWA is also of a view that where possible the treatment techniques used to render a waste suitable for use or disposal should add as much value as possible. Thus if anaerobic digestion is used the digester gas should be used for energy recovery.

⁶ The EWA answers the questions in the Green Paper below, but before doing so, wishes to clarify some of the confusion in the classification of bio wastes.

DEFINITIONS

⁷ Bio waste is defined in the Green Paper as biodegradable garden and park waste, food and kitchen waste from households, restaurants, caterers and retail premises and comparable waste from food processing plants. The Commission might like to think about the terminology of treated bio wastes, which would comply with legislation governing its use. In waste-water management, the raw product is sewage sludge and the treated material, suitable for use, is deemed to be biosolids.

⁸ The EWA has divided those wastes into more precise process streams, as these may be managed in different ways and thus for the answers given to the questions posed in the Green Paper there will some differences.

Garden and park waste

Food manufacturing wastes

Food wastes from restaurants and shops etc

Household food wastes

⁹ There is an assumption that domestic biodegradable waste, (DBW), as part of the municipal solid waste approximates to household food waste (HFW). Whilst DBW comprises a significant proportion of HFW, it may also contain other biodegradable wastes, such as sanitary goods, floral products, pet products and wastes, etc. This may create problems of definition and product quality and increase risk.

ANSWERS TO QUESTIONS

Q1 Bio waste reduction

¹⁰ The Green Paper is right to say that there are no administrative solutions, as possible actions are linked to changing consumer behaviour and retail policies. Indeed there is a challenge in terms of public opinion, understanding and engagement. If the uses of treated bio wastes are so valuable, then the question ought to be “how can we make more”? Asking how we can reduce the amount of product gives the impression that it is of no value. This point is made somewhat ‘tongue in cheek’, but it does underline the need for clear and careful communication.

Green Waste

¹¹ It is important to understand that that some wastes cannot be reduced in any practical way – such as green wastes. Apart from more home composting (and that has limited scope in many homes), the only possible way would be a wholesale change to evergreen shrubs, which would be unrealistic.

¹² There are plenty of opportunities for waste reduction in food production. It is estimated that from farm to plate, or rather from farm to domestic waste collection, 30% of food is wasted and there is scope for better resource utilisation efficiency. Indeed it can be argued that whilst cheap food has been a great social boon, it has also encouraged wasteful behaviour. Food and drink processing can be made more efficient and effective by environmental regulation of sources, particularly through IPPC regulations. If food retailers were to be less choosy over products there would be less wastage at source and processing – such as by allowing a greater diversity in the size of fruit.

Food wastes from shops and restaurants

¹³ This covers a wide range of sources of waste and hence opportunities for waste reduction. The opportunities usually revolve around retail practices. It is possible that the requirements for 'sell by dates' are unnecessarily restrictive and onerous and are unnecessarily demanding, leading to excessive food wastage. This theory needs to be tested against the legitimate needs for sound food quality practices. It is also possible that restaurants which trade on the basis of 'help yourself to all you can carry' menus may lead to excessive food wastage from plates. The only way in which society at large can affect these matters, is through planning and business licensing procedures. These ideas may be more appropriate for large businesses, such as supermarkets and large restaurants, rather than for small shops and cafes. If the Commission wishes to address these issues and other retail matters, it will need to enter a dialogue with organisations representing European food retailers.

Food wastes from homes

¹⁴ There is little that society can do directly to reduce household waste, apart from ensuring that education and public information programmes emphasise the need for prudence. The trend towards pre-packaged meals will contribute to waste reduction, but the retail policy of 'buy one – get one free' has unintended consequences of more wastage from plates and unused food which passes 'eat by dates' is often wasted. Unnecessarily onerous 'eat by 'dates also contribute to food wastage, but this has to be balanced with food safety criteria. It seems reasonable that these retail policies should be tested for their genuine welfare value as opposed to the retail value. Once more issues like this should be pursued by the Commission with European organisations representing food retailers

Q2 Further restrictions on organic wastes to landfill at EU or Member State level

¹⁵ Yes further restrictions but with existing legislation at Member State level.

Q3 Preferred options for treatment. Use of life cycle assessment studies

¹⁶ The EWA would like to draw the attention of the Commission to the large body of data and experience in the water sector for rendering biodegradable organic matter suitable for recycling and for energy recovery. There have been great strides in recent years in increasing the effectiveness and efficiency of anaerobic digestion and composting and these benefits should be migrated to the bio waste sector. Life cycle assessment studies should apply to the use of all organic resources.

Q4 Energy recovery contribution to sustainable resources

¹⁷ The EWA favours recycling as the first rung in a ladder of hierarchies of options. As has been stated before, incineration has its place particularly in large conurbations, but this must always be designed, built and operated to be as energy efficient as possible.

¹⁸ Yes, bio waste can contribute to renewable energy targets. Anaerobic digestion releases energy from bio waste via the creation and use of biogas. Bio waste can be used to grow biomass such as willows and as a direct source of energy or to generate biofuel by pyrolysis and gasification techniques

Q5 Promotion of bio waste recycling. Synergies between bio waste recycling and energy recovery

¹⁹ There need to be national promotional campaigns and partnerships, as exist in the UK, established between producers and users of bio waste products. Indeed there is advantage in having framework partnerships, which promote the safe, sustainable and welcome recycling of all resources. Policy makers and regulators must use more helpful/positive language in the communication of the benefits of these materials. It should be left to the local suppliers of products and services to compete on the basis of cost and customer focus.

²⁰ The most obvious synergy with energy is the use of advanced digestion such as that involving hydrolysis, and the creation of digester gas.

Q6 Should the standards be set for compost as a product only or for compost of lower quality still covered by the waste regime (e.g. for application not linked to food production)?

²⁰ It is important to distinguish between compost destined to be used as a commercial product on a small scale, in which there is no involvement of the producer in product use, and that provided as part of a bulk service to agriculture, in which the producer has some interface with the user. In the latter case the user and producer/supplier have a clear understanding of the objectives of product use. That use should be controlled by agreed good practice and by supervision of the producer/supplier and regulator, which should have responsibility for monitoring the procedure. The smaller commercial scale product operations do not have the opportunities for supervision and so need much more extensive and demanding product quality prescriptions. The distinction is more relevant than that of food/non-food production. It is wrong to describe the bulk service approach as pertaining to a lower quality product for applications not linked to food. Indeed it is likely that the bulk service approach for agriculture will produce more food than the extensive quality control approaches.

²¹ The EWA draws the attention of the Commission to the extensive experience gained using biosolids on land for the parallel uses of soil and product criteria. Care should be exercised in migrating criteria relating to human, plant and animal health to make sure that they are relevant.

²² The EWA is not clear on what is meant by mixed waste. In principle there is nothing wrong about the use of mixed waste and there is a lot of experience of this. But the criteria used to control the recycling practices should always reflect the risks presented by the origins of a waste. So for example the uses of mixed green and food processing food bio wastes will be driven primarily by the food bio waste risks.

²³ Digestate, subject to the same criteria, can be used safely

²⁴ On the whole the EWA is of the opinion that if kitchen waste is disposed via the general household waste (from which other recyclables such as paper, glass, tins, plastics have been separated), the biodegradable fraction may also contain other biodegradable wastes – as explained earlier. This may even result in that combined fraction not being classified as bio waste. It seems less risky if kitchen waste was to be disposed with domestic green wastes. The EWA suggests that these options should be compared by environmental risk assessment. If the option of co-disposal, as suggested above, is favoured, the Commission might consider how guidance could be given to the waste collection authorities on this matter.

²⁵ There is a particular issue of the co-disposal of waste water and kitchen waters via sink disposal units. These add biodegradable loads to municipal wastewater. The wastewater utilities have, in general, been against these because of the operational problems they cause and the additional cost burden of treatment which cannot be recovered by conventional utility charges. Once again the EWA recommends that this matter should be resolved finally by environmental risk assessment, and if sink disposal units are favoured, Member States will, at the very least, need to consider whether ownership and use of the units should be licensed by water utilities and subject to tariffs.

Q7 Gaps in the regulatory framework concerning plants which do not fall in the IPPC scope and how should these be addressed.

²⁶ All plants producing effluents and waste should be regulated. If by virtue of sub sector or size they are exempt from the IPPC regulations they should still be subject to parallel national regulations. Equally all commercial and utility compost plants should be subject to regulation – but home and small communal plants and their products may be exempt.

Q8 Advantages/disadvantages of treatment and use of alternative bio waste management techniques. Obstacles preventing further developments and introduction of techniques

²⁷ The EWA is pleased to see that recycling of organic wastes is recognised as being good for soil fertility and that it contributes to the mitigation of climate change. It must be recognised that good utility operations need to be founded on robust reliable processes. There is always risk in being a forerunner in introducing new processes and uses, so there is a need for supported European and national demonstration plants to gain data and increase confidence. Availability of funds is always problem – so European research funds should continue to treat these matters as a priority. Legislation and regulatory practice should always encourage innovation.

FINAL REMARKS

²⁸ The EWA would be pleased to elaborate on any of its answers at the discretion of the Commission

EWA, Hennef, February 2009

European Water Association



The European Water Association (EWA) is an independent non-governmental and nonprofit making organisation dealing with the management and improvement of the water environment. It was founded on 22 June 1981 as the European Water Pollution Control Association. The scope of the Association was enlarged in 1999 with the change of name to the European Water Association.

It is one of the major professional associations in Europe that covers the whole water sector, wastewater as well as drinking water and water related waste. With member associations from nearly all European countries EWA consists of most European Union Member States, including all countries from Central and Eastern Europe which joined the European Union on 1 May 2004. Other European countries represented within the EWA are Croatia, Romania, Ukraine, Serbia and Montenegro, Norway, and Switzerland.

The aim of EWA is to provide a forum for the discussion of key technical and policy issues affecting the growing European region. This is done through conferences, workshops, meetings and special working groups of experts all organised on an international basis together with regular publications.

EWA informs its members on the development of EU legislation and standardisation and seeks to influence the drafting when appropriate. It has close contacts with the European Commission (DG Environment), the European Committee for Standardization (CEN), the European Environment Agency (EEA) and the European Parliament.

Through this exchange of knowledge the objective of EWA is to contribute to sustainable water management, a safe water supply and the protection of the water environment.

Today, EWA consists today of about 25 European national associations each representing professionals and technicians for wastewater and water utilities, academics, consultants and contractors as well as a growing number of corporate member firms and enterprises. EWA thus represents about 55,000 professional individuals working in the broad field of water management.

Our vision

As a major and influential European organisation representing water professionals through their National Associations, EWA promotes the sustainable management of the total water cycle for Society's needs coupled with excellent service provided by informed and expert people.

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