



Mr S Ryan
DEFRA
Ergon House
6th Floor
Smith's Square
London
SW1P 3JR

Dear Mr Ryan,

RE: Acceptance of output from Mechanical Biological Treatment within the End of Waste Criteria for Biodegradable Waste subject to Biological treatment.

The Local Authority Recycling Advisory Committee (LARAC) represents its Local Authority members across the spectrum of waste collection, disposal, unitary and metropolitan type functions. As an organisation LARAC is technology neutral and has no vested stake in the promotion of particular waste treatment technologies over others.

LARAC represented Municipal Waste Europe at the European Commission 2nd Workshop on Biodegradable Waste subject to Biological Treatment 24th and 25th October 2011.

Discussion took place throughout the workshop on compost like output derived from Mechanical Biological Treatment and its inclusion or not on the accepted positive list of inputs permitted to achieve end of waste criteria status.

LARAC endorses the view that the quality of compost produced, not the choice of technology deployed during reprocessing, should be the determinant for acceptance or not for the purpose of end of waste criteria status.

LARAC recognises the role that MBT can fulfil as an option for the sustainable treatment of biodegradable waste, creating output suitable for intended applications. LARAC recognises that MBT technology and other technologies treating residual waste will advance over time and would not wish to see such advancement stymied. LARAC offers the view that the composition of residual waste streams will change over time; also that they will become less hazardous over time as a variety of factors such as REACH, producer responsibility legislation and increased public awareness take effect.



For example, evidence presented on day one of the workshop by the Joint Research Centre, Institute for Prospective Technological Studies included data on Mercury (Hg) concentration (in mg/kg of dry matter) in compost derived from MBT process. The evidence presented gave the results from samples taken between 2003 – 2005, 2004 – 2007 and 2009 – 2010.

For each of the phases of analysis the Mercury concentration in the MBT derived compost had reduced when compared to the previous phase. Importantly, since 2004, Mercury concentration in MBT derived compost was within the proposed 1mg/kg dry matter threshold for other permitted compost inputs. The same trend is likely to apply to other heavy metals and contaminants.

Therefore LARAC advocates that more research should be undertaken to ensure the scientific evidence base is comprehensive enough to support any decision that only source separated material should be included in compost inputs permitted for inclusion to end of waste criteria status.

LARAC also advocates that the quality of the material, not the process deployed should be the determinant used for whether or not a material is to be included or not to the positive list of accepted inputs.

LARAC also advocates, to some degree, freedom of choice on waste collection and treatment methods to reflect local circumstances, not, without sound reasons, limiting the choices to processes that will only treat source-separated biowaste.

For and on behalf of LARAC

Mark Foxall
National Representative, LARAC