



Local Authority Recycling Advisory Committee

David White
Environment Protection - Waste
Block 1 - Government Building
Burghill Road
Westbury-on-Trym
Bristol
BS10 6BF

28th January 2008

Dear Mr. White

Consultation Response - Assessing the diversion of biodegradable municipal waste from MBT plant.

I am writing to present the LARAC response to the above Consultation, which is contained below, and I thank you for the opportunity to respond to the above consultation.

The comments below are sent on behalf of the Local Authority Recycling Advisory Committee (LARAC). LARAC is an association of well over 400 local authorities across England, Scotland Wales and Northern Ireland whose waste management and recycling professionals' co-ordinate and operate waste management services. Membership is drawn from all types of authority including statutory Waste Collection (WCA), Waste Disposal (WDA) and Unitary.

Overall LARAC is concerned that our comments from the previous consultation have been ignored by the Environment Agency who seem to have put cost of testing regimes above accuracy of testing and biodegradability of material. We therefore prefer option A as the way forward. Overleaf are our detailed comments as requested in the consultation.

If you have any queries on this response or would like to discuss the matter further then please contact me on 01227-862247 or email: www.ian.mackenzie@canterbury.gov.uk.

Yours faithfully,

Ian MacKenzie



Local Authority Recycling Advisory Committee

LARAC Policy Team

Q1: Which option (A) or (B) do you prefer and why?

We consider that **option A** offers the best practical solution to local authorities involved with MBT plant.

Q2: Other comments

As the consultation document states, the processes adopted in **option A** are already in use across the industry and do not require enhanced sampling to ensure sufficiently accurate data.

Option B would will also measure non-biodegradable material and slow-release biodegradable material as biodegradable, so would militate against high C:N biowastes – including processes that could, in effect, sequester carbon into soils.

There is also the issue of accurately determining degradation, which does have a direct impact on the statistics which would have to be sent via WDF and will overall increase the total amount of biodegradable waste sent to landfill, upon which the UK government will have to report to the EU on meeting the targets set by them.

Although your consultation suggests higher initial costs in testing associated with option A, the ongoing testing costs of either scheme are not that disparate and still lead us to consider **option A** as the most appropriate testing method. It is accepted that this is a more onerous method of testing and would recommend that the testing is applied in such a way to characterise a plant/process, then rely on constant process parameters and input materials to maintain a consistency of output materials. LOI could be used as an occasional “quick check” to ensure consistency.

Changes in raw materials or the way the process is operated would require further testing.

Materials of or below a given residual biodegradability (ie: about the same as top soil) should be assigned a “zero biodegradability” value and be accounted as 100% reduction in BMW landfilled.

Q3: Steering Group

If required we would be prepared to nominate a representative to join in the task and finish steering group proposed.