



18 October 2012

Jo Marchant  
Environment and Business Advisor  
Environment Agency  
Kings Meadow House  
Kings Meadow Road  
Reading  
RG1 8DQ

Dear Jo,

#### AD Quality Protocol Consultation

The Ulster Farmers' Union (UFU) welcomes the opportunity to comment on the proposed revision of the Anaerobic Digestion Quality Protocol. The UFU is supporting moves towards establishing smaller on-farm Anaerobic Digestion units. The majority of on-farm AD plants in Northern Ireland will use livestock slurry, grass-based silage and possibly food waste. This response will reflect the concerns of our members.

#### 1.e Appendix B - "Biowaste types acceptable for the production of quality digestate"

The UFU has a specific query in reference to detail on Page 21 (clean version) under the heading "wastes from agriculture..." and the point "*Animal faeces, urine and manure (including spoiled straw), effluent, collected separately and treated off site*"

**UFU view** – this needs to be amended to "Animal/Bird faeces, urine and manure (including spoiled straw) effluent collected separately. During the "consultation period", the UFU sought clarity on whether animal faeces, urine and manure can be collected and used on the same farm as the AD plant and collected and treated at another location and treated off-site.

The Environment Agency replied and confirmed that animal faeces, urine and manure can be collected and used on the same farm as the AD plant and collected and treated at another location. The Environment Agency did admit that the EWC code wording does cause confusion, and the UFU would ask that the words 'and treated off site' are removed.

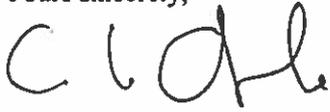
#### 2. **Inputs to be removed** - It is being proposed that some wastes currently listed as acceptable inputs are removed from the Quality Protocol, for a variety of reasons.

**Plastics** – whilst the UFU understands that BSEN13242 is a standard which can be used for compost, the same cannot be applied to digestate. Compostable plastics do not break down fully under anaerobic conditions which will have implications for digestate quality. Standard practice is that packaging of this sort is removed before materials enter the digestion process.

UFU View – the distinction needs to be made between intentional and unintentional input of plastic used in food waste. In the case of unintentional use, an allowance needs to be made to ensure that users are not penalised.

If you have any queries do not hesitate to get in contact.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'C Osborne'.

**Chris Osborne**  
**UFU Senior Policy Officer**