

Questions and issues on Animal By-products

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Overview

Problems perceived

Solutions

Recommendations

Welcome some developments

- This event
- Consultations with Cré
- Attendance at Cré events
- Ongoing publication of guidance notes
- Progress from initial position

Difficulties

95% of the industry treat only catering waste

- This is aimed at animal by-products
- Specific guidance would make things a lot simpler

No guidance on alternative conditions

Cost of compliance, No grant aid

Cheaper (more risky?) alternatives

Where to use product?

Barriers to entry to the industry

Confusion over National and European policy

- Confusion exists in industry
- National progress towards targets is poor.
- Deliverability of projects is damaged

Clear and consistent advice

- Need more detail, industry still confused!
 - Definitions
 - Parameters
- Keep advice consistent
- Even playing pitch
- Commercial consequence of advice
- Address catering waste separately

Definitions

Define “Open”, “Closed”, “Flow”, “Grazing Ban”, “Pasture”

What Category is...?

- Meat excluded catering waste?
- Non-diseased fish farm mortalities?
- Sludges from intensive livestock farms?
- Tromelled fines?
- Belly grass?
- Feathers?
- Poultry bedding?
- Leachate?
- Former foodstuffs

Waste code	Waste description	Additional comments and use restrictions
20 00 00	Municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions	
20 01	Separately collected fractions (except 15 01)	
20 01 01	Paper and cardboard	The addition of high-gloss paper and waste wallpaper is not permitted.
20 01 08	Biodegradable kitchen and canteen waste	
20 01 25	Edible oil and fat	Only for anaerobic digestion.
20 01 38	Wood other than that mentioned in 20 01 37	
20 02	Garden and park wastes (including cemetery waste)	
20 02 01	Biodegradable waste	Except grass and bush cuttings from roadside.
20 03	Other municipal wastes	
20 03 01	Mixed municipal waste	Only for mechanical/ biological treatment.
20 03 02	Waste from markets	Only if the biowaste is separately collected, otherwise only for mechanical/ biological treatment.
20 03 04	Septic tank sludge	Only if it fulfils the requirements of Directive 86/278/EEC for the use of sludge in agriculture.

Define these

12mm, 70°C, 1 hour

“Difficult / impossible” to achieve at reasonable cost

Some Category 3 material may be treated under alternative national rules

- Process-based not facility-based
- Any examples of what has been approved?

Europe

Denmark, Netherlands, Spain...

- Compost catering waste in open windrows
- Why such different rules in Europe?
- National competitiveness is at risk

UK

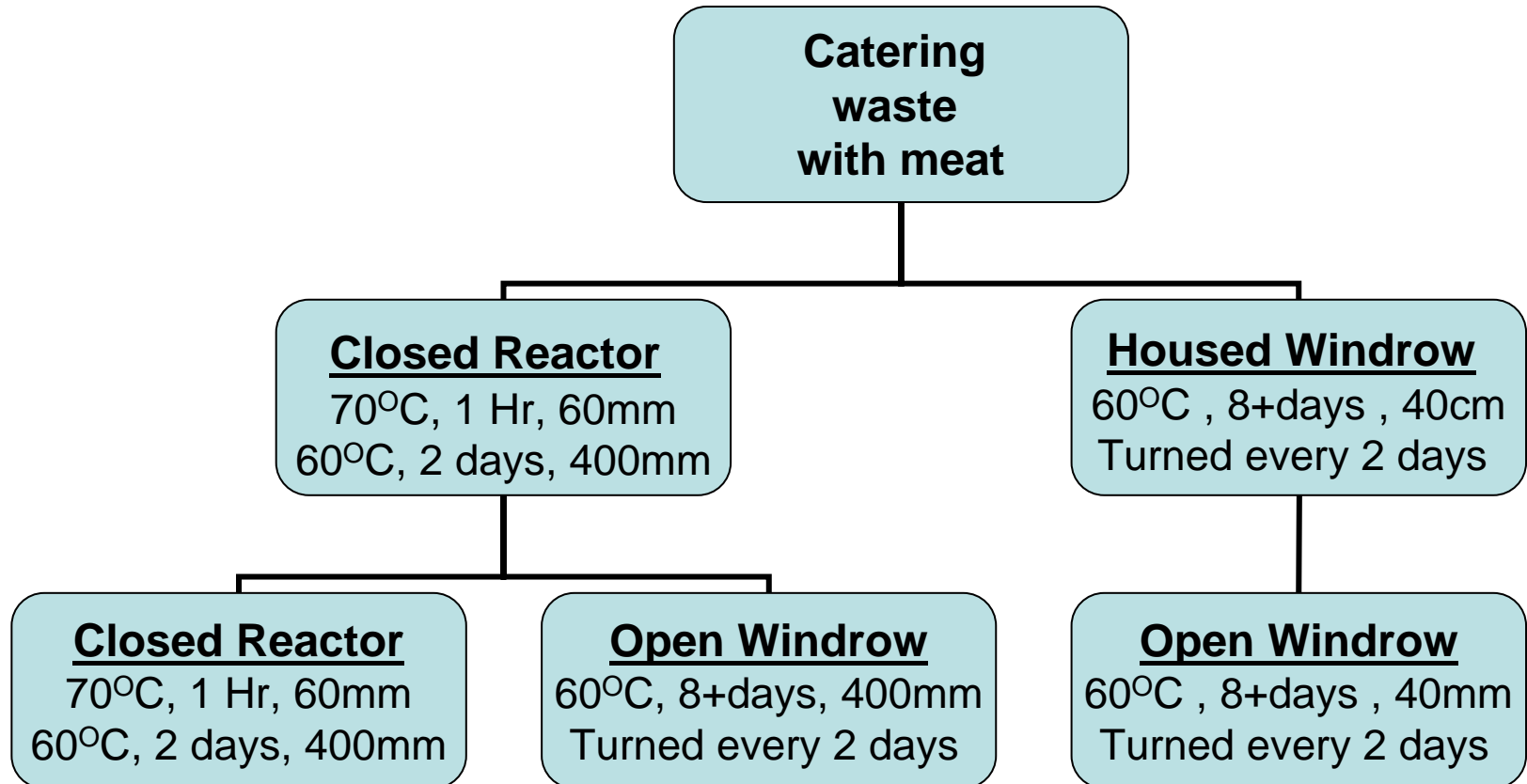
- Easy to refer to, clear guidance is published
- Very restrictive
- Implicit approval given to some systems

Legislation Allows

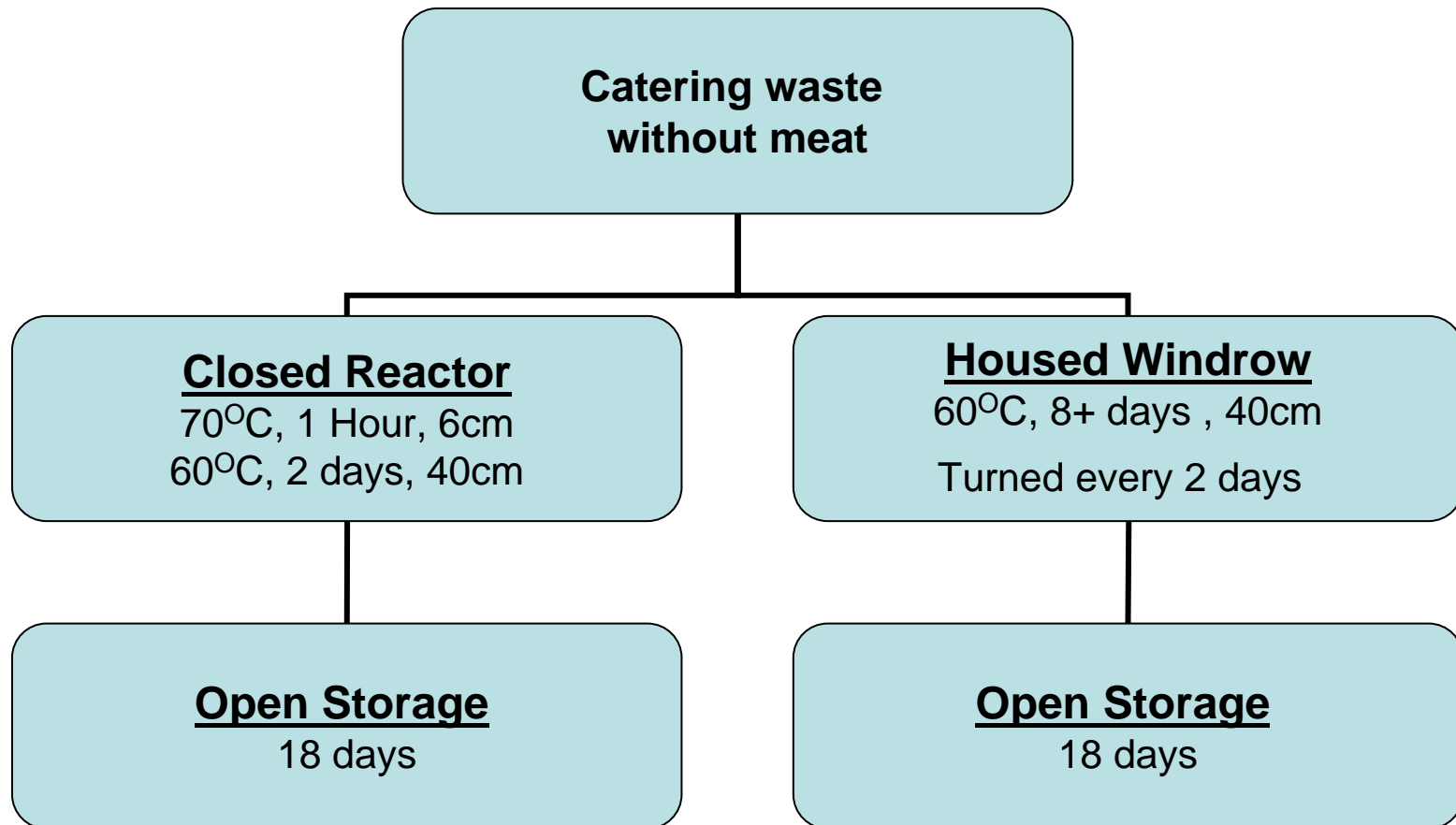
Any Category 3 animal by-product

Closed Reactor
70°C, 1 Hr, 12mm

UK



UK



Austria

Catering waste with meat

Open Windrow

55°C, held 2 days,
5 turns in 14 days

Microbiology

- Change to E. Coli is welcome
- We need standardised analytical methods
- No lab analyse “indicator organism” in Ireland
- UK labs will be costly

Wash down & Leachate

Delivery vehicle washing

- UK “could be simple as a hosepipe and tap”
- Steam cleaners? Fixed cleaners?
- Clarify need for disinfectant
- Disinfectant difficult to handle

Can leachate & wash down go untreated to WWTP?

Pasteurisation before WWTP?

Remember macerators dispose to WWTP

Timing

- When will we see first approvals / certifications?
- How long will it take to work an application through the system from scratch?

Cost

Third layer of regulation

- Sampling/Analysis
- Disinfection, Wheel washing, Leachate Management
- Additional screening, shredding
- Infrastructural changes

Financial support? Grant aid?

Regulation (EC) No 1774/2002 of the European Parliament and of the Council of 3 October 2002 laying down health rules concerning animal by-products not intended for human consumption

The Animal By-Products Regulations 2003

Approval of technical plants for specific operations

In accordance with regulation 13, 14 and 40 of the Animal By-Products Regulations 2003 and Article 18 of Regulation (EC) No. 1774/2002, the Secretary of State approves any premises to:

- (a) produce walking sticks and other craft products from antlers;
- (b) produce walking sticks from sheep, goat, cattle or buffalo horns which have been removed from the skull using a method which left the cranial cavity intact;
- (c) blow eggs from ducks, geese, emus etc. for craft purposes;
- (d) cure horse tails for use on rocking horses.
- (e) use mollusc or crustacean shells from which the flesh has been removed, for:
 - (i) the production of aggregates;
 - (ii) use in gardens;
 - (iii) the construction, maintenance or repair of footpaths;
 - (iv) use in draining the land; or
 - (v) ornamental use;
- (f) for by-products from fish and shellfish which were caught or landed in the UK, use on hooks or in pots as a lure for fish or shellfish; or
- (g) treat sheep's wool, ruminant hair or pig bristles by factory washing, tanning or some other method that ensures that no pathogens remain.

In the case of walking sticks produced from cattle horn from the UK or Portugal it is a condition of this approval that documentary evidence of the origin of the horn must be retained for at least two years.

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COMPOSTING ASSOCIATION
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Grazing ban

How long?

- 3 weeks acceptable to EU
- Complete ban not justified

Industry very reliant on agri-land

- 9 % of land used for grazing (ABPR)

- 9 % of land used for grazing

Conflicting Legislation

The industry cannot develop without landspread
Landspread is integral to industry

Nitrates Legislation

Nitrates Legislation will severely curtail land spreading of all organic waste

If a grower applies any organic waste

- Automatically into Index 4 (most restricted)
- Restricted N rates allowed for four years

Manures preferred over compost

Urgent action required

Other legislation

Waste

– Inc

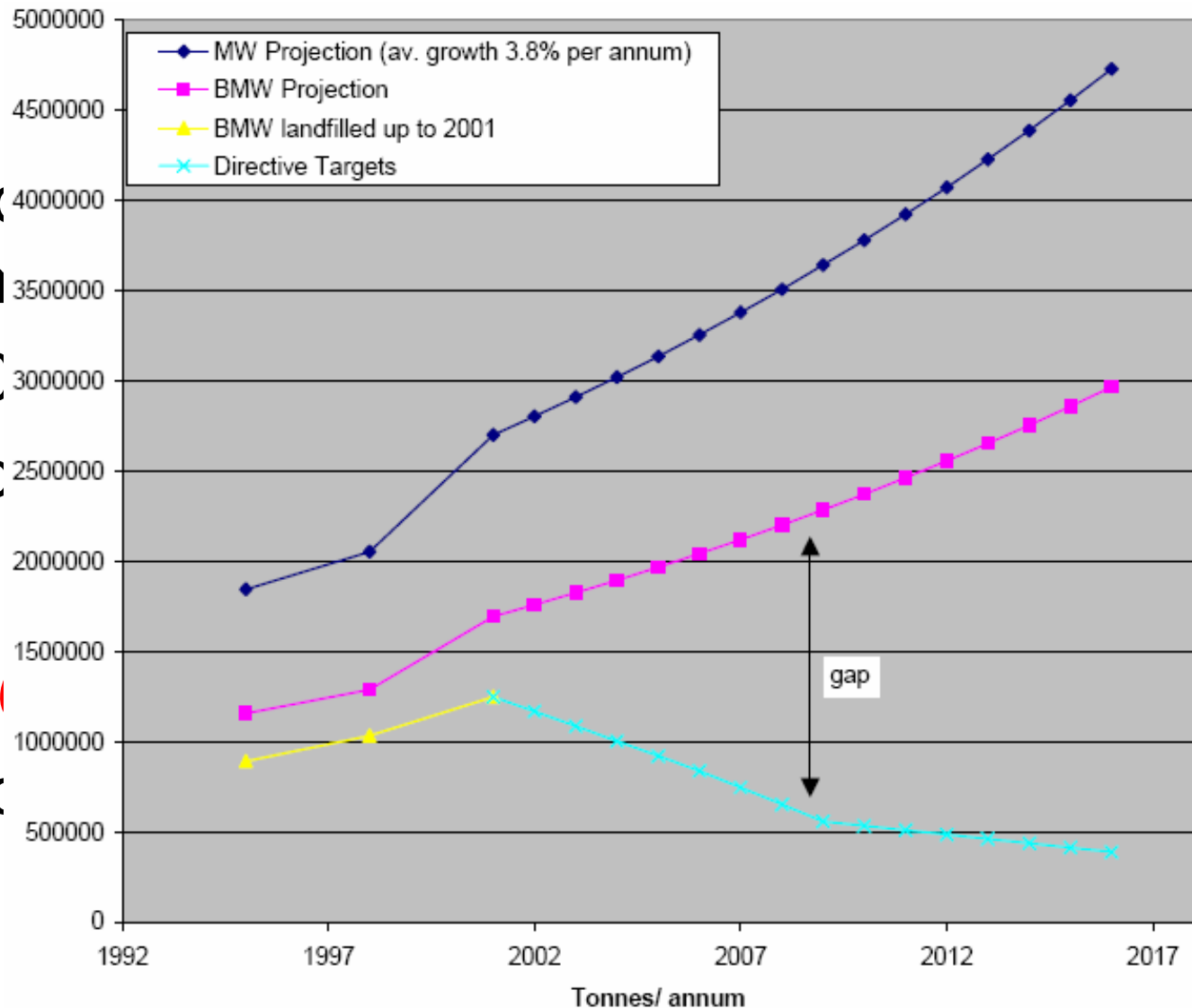
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Policy harming industry

Policy deficit and clarity deficit

- European
- National

The industry needs to grow substantially

Need clear regulatory signals

“Bankability” and project development difficult

Animal Health MORE at risk

Environment MORE at risk

Ireland loses

Co-operation

Cross-sectoral legislation

- Animal by-products Regulation
 - DoA affecting DoE area
- Nitrates Legislation
 - DoE affecting DoA area

Input from both Departments required

Input from industry required

Working Group

Perspective

Remember, alternatives are risky

- Landfill
- Home composting
- Unregulated disposal

Recommendations

Clarity in guidance notes

Two separate permitting systems for

- Catering waste
- Other Category 3 animal by-products

Website

Designate contact personnel in Department of Ag.

Continue consultation process with industry

Keep perspective

- Cost, alternatives, other legislation

Establish a Working Group with all