

Cynulliad Cenedlaethol Cymru Pwyllgor Amgylchedd a Chynaliadwyedd	National Assembly for Wales Environment and Sustainability Committee
Egwyddorion cyffredinol Bil Amgylchedd (Cymru)	General principals of the Environment (Wales) Bill
Ymateb gan Biological Preparations (Saesneg yn unig)	Response from Biological Preparations
EB 57	EB 57



Cynulliad
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National
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Wales



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Biological Preparations Ltd, est in 2008, is an innovative biotechnical Welsh company with a Cardiff head office and Caerphilly research and manufacturing facilities and employs 62 people. The company is widely recognised as the leading company in the UK specialising in the development of products based on microbial, antimicrobial, plant extract and enzyme technology. Our products are used extensively in the catering, waste treatment, drainage and waste water industries. One of the innovative products we supply is used in the Mechline Waste 2O enzyme biodigester to enable commercial and public sector kitchens to responsibly dispose of their foodwaste. The enzyme products were developed and are manufactured in Wales and are central to the operation of these digesters which are increasingly being used by hospitals, prisons and educational establishments.

Biological Preparations welcomes the opportunity to submit its opinion to the Environment and Sustainability Committee of the Assembly on its consultation on the Environment (Wales) Bill. While we support the principals of the Bill and its objective of minimising waste and enhancing the recovery and re-use of materials we believe the Administration and the associated research undertaken for the Impact Assessment has not recognised how Welsh based research can transform foodwaste management. The 'single solution' model for separate collection of commercial foodwaste to Anaerobic Digestion being proposed by the Administration is somewhat worrying to us as this legislation would snuff out an innovative process in it's home market, a retrograde step and one which we wish to avoid

Four key concerns should to be considered further by the Committee:

- The research for the Impact Assessment appears not to have considered the fact that Wales is a leading centre in the UK for the development of enzyme and other biological products for managing food waste. We find this disappointing and counterproductive. If our home market is denied to us, this will place us at a competitive disadvantage to other less sophisticated methods of food waste management outside of Wales. We have spoken to an AM and made representations to the Administration and are (again) disappointed that our concerns ate vnot addressed in the Draft
- The Impact Assessment seeks to justify a ban on disposal to sewer in relation to cost savings with more than half of the figure of £5.6m of estimated savings claimed being generated from preventing blockages. It appears to have been ignored that enzyme digesters cause no blockages and indeed a number of UK water companies use the technology to enable then to deal with sewers that are prone to drainage problems. Consequently we can only assume this figure is based on other systems and technologies but is used as a reason to van our product being used in Wales.

- The food hospitality sector is a critical employer throughout Wales and more should be done to encourage them to thrive rather than treating them as polluters who must pay. The current policy will impose extra costs and bureaucracy on a sector which is only now recovering from deep recession. It will also discourage innovations in how kitchens can manage their own unavoidable foodwaste. We believe far more could be achieved in encouraging caterers to optimise their use of food rather than impose an expensive systems of collection which encourages the maximisation of foodwaste to satisfy the expected demand for AD feedstock.
- The ban on foodwaste to sewer (Section 34D 5 of the Bill) fails to consider that the output from enzyme biodigesters is a microscopic suspension in water that is a much lower density than the legislation will allow. This appears to be a contradiction.
- Anaerobic Digestion has an important place in recycling foodwaste but it is surely short sighted to become depended on a 'single solution' which is not without operational short comings and risks, especially as a number of future Welsh centres are not yet in operation. Yet through association this innovative Anglo Welsh process would be banned due to legislative inflexibility within the current clauses.
- In the European Union, Wales is proud of its position as having the best recycling record in the UK and as a nation, the fourth best among all EU member states. However, Scandinavian countries and the Dutch have frequently warned about the limitations of AD and have subsequently diversified their solutions. Feedstock contamination is one of their most oft cited concerns. Recently the European Commission has launched a new consultation on the circular economy and following actions in Nordic countries, Switzerland and Germany is flagging up the potential for capturing phosphates and nutrients from sewer works which could considerably boost resource capture. The Environment Bill and the wider UK debate has yet to catch up with these developments.

In conclusion Biological Preparations remains extremely concerned that our expanding Welsh company whose technology is being successfully sold in many major world economies could lose its home market. We believe the justifications for creating the barriers to entry to this market are wrong and will place an over reliance on a single solution method for managing catering foodwaste which is fraught with uncertainty and risk. We would ask the members of the National Assembly to build more flexibility into the legislation to enable innovation and enterprise to prosper in the Welsh foodwaste sector.

