Cynulliad Cenedlaethol Cymru Pwyllgor Amgylchedd a Chynaliadwyedd	National Assembly for Wales Environment and Sustainability Committee
Egwyddorion cyffredinol Bil yr Amgylchedd (Cymru)	General principals of the Environment (Wales) Bill
Ymateb gan Catering Equipment Suppliers Association	Response from Catering Equipment Suppliers Association
EB 30	EB 30

The Committee Clerk: Alun Davidson
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The Catering Equipment Suppliers Association (CESA) is the trade association representing over 170 companies that supply commercial catering equipment – from utensils to full kitchen schemes – throughout the United Kingdom. The association is the authoritative voice of the industry, it is also a member of the European Federation of Catering Equipment Manufacturers and is the chair of its technical committee.

Wales is a leading centre for the manufacturing of commercial catering equipment and arguable the leader in food waste disposal technology (FWDs) in the United Kingdom with leading CESA member companies based in Wrexham and Blaenau Ffestiniog. These companies supply the UK, European and international markets. Being able to supply their home market is a fundamental part of the companies' commercial reputations as they seek to expand their wider client base.

CESA supports the aims of the Environment (Wales) Bill in preventing food waste and minimising the use of landfill. However our members are particularly concerned by section 4 of the Bill where it relates to the management of food waste. We are deeply worried about the prescriptive proposal to ban commercial food waste disposers (FWDs) to sewers – a policy which has no basis in independent scientific evidence and is a retrograde step in the operation of commercial food service waste management for Wales. Statistics available to CESA show that there are in excess of 15000 catering and hospitality establishments distributed throughout the country most of which would be negatively impacted by the current Bill. By our estimation around 2400 commercial food waste disposers will be in use, either alone, with dewaters or as part of an integrated on-site composting system.

The use of FWDs is a tested and proven technology with which many Welsh businesses are already achieving key planks of the Welsh waste policy. Over decades of use, food waste disposers have proved, in robust and extensive scientific tests, to be one of the most

environmentally sound, carbon and cost efficient means of capturing and recovering value from food waste. Expert monitoring has further demonstrated that they cause no detrimental effect to sewerage systems or additional loading for waste water treatment works. They have been proven to significantly increase biogas extraction where anaerobic digestion is used, prevent contamination of food waste by objects that can impede further processing and improve the quality of other dry recyclables.

There are also proven effective means of undertaking separation of food waste at source. Food waste disposers can also be a key part in food management schemes that currently enable larger caterers such as the armed forces, hospitals, prisons and universities to completely recycle their food waste on site using integrated systems combining FWDs, dewaterers and composting equipment. Wales has a number of these on-site food management schemes in operation. The ban will discourage investment in innovative, environmentally friendly,cost effective and efficient schemes that use this technology. Wales is a leading centre for the design and manufacture of such technology in the UK. Dewaterers can also be used with an FWD to remove the water content from food waste which reduces weight and ensures uncontaminated high quality feedstock for AD or composting.

The use of FWDs by the catering sector also reduces the attendant risks of storing food waste for collection both in terms of odours and vermin and the overall hygiene in and around the kitchen area. This is especially true in inner city areas where the proximity of domestic residences and catering waste can be the source of social friction. The use of FWDs also minimises the temptation of some businesses to resort to fly tipping.

CESA questions the basis of the Impact Assessment that is used to justify the Bill's proposals on food waste management for the following reasons:

- The Impact Study seeks to justify a policy of banning the use of food waste disposers to sewer using a model to produce outcomes which we believe cannot be substantiated. In suggesting that savings of £9million could be gained by banning food waste to sewer some £5.6m is seen as a result of avoiding blockages. Understanding how these figures are achieved by the study is impossible with the data made available. Severn Trent have said blockages for the whole of their area of 7.7 million people cost £10 million pa and most of this is caused by wipes and other objects being flushed down toilets. This figure seems to cast considerable doubt on the Impact Assessment figure. A significant body of published scientific research and expert environmental impact assessments all support the use of food waste disposers and shows how they are not the cause of blockages. The problem of fats, oils and grease(FOG) in sewers is a significant issue but it is not caused by food waste disposers.

- The Impact Assessment fails to clearly address the cost of this ban to the most affected segment of the Welsh economy: Catering services in both the private & public sector. There are approximately 2400 FWDs in use by businesses in Wales. The equipment has a 10-12 year life cycle but no estimates of the potential costs and loss of working capital to impacted businesses are made. The businesses affected will range from B&Bs, High Street shops and restaurants and the catering facilities of hospitals, schools, offices, prisons and military installations.

- The Impact Assessment fails to recognise that regulation will close the Welsh market to highly successful, established North Wales manufacturing businesses and impede the potential development of an enzyme production company in South East Wales which is a UK wide leader in its field.

- We are also surprised that given the roles our member companies play in the Welsh economy that at no time were they contacted by the researchers. This despite the fact that the companies concerned and this trade association had made representations to the Administration.

As the Welsh economy emerges from the most challenging economic environment contrast 1920s, the Impact Assessment fails to clarify the direct costs to food service establishments in Wales that have already invested in food waste disposers, to enable them to deal responsibly and hygienically with this waste stream. At a time when operators are still facing the severest business constraints, they will be forced to write off an investment that already fulfils the function in the most sustainable manner and they will also face heavy additional liabilities of re-training staff, unplanned storage requirements, mandatory collections and additional un-budgeted treatment charges.

Industry experts predict that the costs, for collection and treatment alone, will be in the range of £100 per tonne of food waste. Recent estimates for the average restaurant measn that this would be an annual collection charge of £4,400, rising to £18,000 for larger hotels, an additional £15,600 for individual universities and £12,500 for hospitals. For many smaller undertakings pubs, cafes and bed and breakfast establishments the impact will be considerable.

The Case for Food Waste Disposers

Food waste disposers that discharge to sewer supporting dewatering systems, or provide material for onsite composting, all comply with the EU's Waste Framework Directive.

- FWD to sewer waste management systems are primarily used in smaller establishments (eg B&Bs) as an effective means of capturing food waste. They eliminate the common contaminants such as cling film and plastics that are already proving a barrier to effective AD processing. General rejection rates at AD plants can

run at 15-20% and the rejected waste goes to landfill. FWD waste has all such contaminates removed at source and therefore is 100% efficient in its treatment at source.

- In hospitals, food waste disposers are a vital means of maintaining hygiene and avoiding infection on wards and in kitchens. In prisons and military establishments they aid security by reducing the number of external contractors' vehicles entering the premises.

- When a FWD is used in conjunction with a dewatering system it reduces the volume and weight of food waste for transport to processing facilities. This reduces both cost and carbon emissions, prior to the extraction of soil improver and biogas. As we have mentioned previously Welsh companies are at the forefront of the development of innovative dewatering technology and onsite composting for the catering industry.

- FWD to onsite composting is a totally self-contained system, which removes all burden from local authorities and provides PAS 100 quality compost.

- The international scientific community has conducted robust and scientifically objective studies into the use of FWDs and their output. The Chartered Institution of Water & Environmental Management (CIWEM)[1] position paper is the most up to date and comprehensive evaluation of this work. Despite a number of consultative opportunities the water industry has not provided any comparable evidence. The oft cited Water UK 2009 paper has no referenced scientific base for its contention.

- Any suggestion that the costs incurred by the ban on food waste disposers are justified by waste targets and EU policy objectives is not recognised in the established scientific evidence base on the use of the equipment, much of which has been commissioned by water authorities in nations that are leaders in environmental practice. In Sweden, studies have shown that the resource value of food waste is effectively captured, without need for carbon-intensive additional food waste collections.

- The current European Commission consultation on the circular economy recognises that Sweden, Denmark, the Netherlands and Germany either have or are exploring the recovery of phosphorous and other nutrients from Waste Water Treatment Works. This would potentially enhance the value of sewage sludge and the future management of organic waste from the sewers.

[1] http://www.ciwem.org/policy-and-international/policy-position-statements/food-waste-disposers.aspx

While our members wholly support the reduction of food waste, in catering preparation and service there will always be left over food. Operators have already invested in proven technology to manage this hygienically and sustainably and the sector cannot carry the additional burden of a policy that threatens its commercial viability, to the benefit of other commercial sectors.

During a period of severe constraint on public finances and competition for those resources it is important to note that the catering industry's use of FWD technology does not rely on public funding or subsidy. This is in stark contrast to the 'single solution' separate collection AD model being advanced which has seen £600 million made available to local authorities to support separate collection, grants to encourage construction of AD sites as well as the renewable energy certificates given to AD operators which are 300 percent higher than those granted to AD sites linked to existing Waste Water Treatment Works.

Our members are committed to maintain environmental diligence but are very concerned that the Welsh Administration is proposing the ban of a proven method for managing and recycling food waste. It is not cost effective to replace this with a 'single solution model' for recycling food waste despite the risks and uncertainties that exist with AD systems.

We cannot understand the reasons for the proposed placing of a ban on equipment that is already helping Wales meet its waste targets and which can make a larger contribution without the need for detailed planning requirements or complex logistical structures.

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