

Submission from the Catering Equipment Suppliers Association (CESA)

The Catering Equipment Suppliers Association (CESA) is the trade association representing over 150 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.

CESA supports the aims of the Scottish Zero Waste Policy, in preventing food waste and minimising waste sent to landfill, but is deeply concerned about the prescriptive proposal to ban commercial food waste disposers (FWD) 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 Scotland.

The use of FWDs is a tested and proven technology with which nearly 3000 Scottish businesses are already achieving key planks of the Scottish Zero 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 proved 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. They are an effective means of undertaking separation of food waste at source. Food waste disposers are also a key part of 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. Scotland has a number of these on-site food management schemes in operation. The ban will discourage investment in environmentally friendly, innovative, cost effective and efficient schemes that use FWDs, dewatering and in-situ composting technology.

On a critical issue for many CESA members we welcome this opportunity to comment to the Rural Affairs, Climate Change and Environment Committee of the Scottish Parliament.

1. First we question the Business Regulatory Impact Assessment that is used to justify the Policy Statement for the following reasons:

- The BRIA seeks to justify a policy of banning the use of food waste disposers to sewer, without providing supporting evidence. A significant body of published scientific research and expert environmental impact assessments all support the use of food waste disposers.
- The BRIA fails to clearly address the cost of this ban to the most affected segment of the Scottish economy: catering services in both the private & public sector. There are some 3000 FWDs in use by businesses in Scotland. The equipment has a 10-12 year life cycle but no estimates of the potential costs to impacted business are made.

- The BRIA fails to recognise that the regulation will close the Scottish market to one South of Scotland manufacturer of motors for commercial food waste disposers and will furthermore denigrate the eco-credentials of this company's product, on the basis of unproven speculation.
- The only case study provided, as an example of the food and drink sector, highlights potential efficiencies in unrelated energy saving with no clear analysis of the specific cost relating to the changes in the food waste management regulations.

In the most challenging economic environment since the 1920s, the BRIA fails to clarify the direct costs to food service establishments in Scotland 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 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 unbudgeted 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. For the average restaurant this would be an annual collection charge of £4,400, £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.

2. In considering paragraph 5.2 of the Scottish Governments Position Statement CESA have the following objections and comments:

a. Food waste disposers discharging to sewer, or supporting dewatering systems, or onsite composting, all comply with the Waste Framework Directive.

b. FWD to sewer waste management systems are primarily used in smaller establishments (B & Bs) as an effective means of capturing food waste. They eliminate the common contaminants such as cling film and plastics that in Scotland and other countries are already proving a barrier to effective AD processing. General rejection rates at AD plants run at 15-20% and the rejected waste goes to landfill. FWD waste has all such contaminants removed at source and therefore is 100% efficient.

c. In hospitals food waste disposers are a vital means of maintaining hygiene and avoiding infection on wards and in kitchens

d. 55% of Scottish processed sewage sludge is already used as a soil improver, the figure is 80.3% for the UK as a whole. This includes waste streams from FWDs to sewer. The figure for the UK as a whole is due to rise to 85% by 2015.

e. FWD supporting dewatering systems reduce the volume for transport to processing facilities, diminishing both cost and carbon emissions, prior to the extraction of soil improver and biogas.

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

g. It is untrue that many countries have banned FWDs. The list of countries that permit or recommend FWDs is as follows: Austria, Bulgaria, Cyprus, Czech Republic, Denmark, Estonia, Finland, Germany, Greece, Hungary, Ireland, Italy, Latvia, Malta, Norway, Romania and Sweden.

A handful prohibit: France, Netherlands, Poland and Luxembourg. While local authorities in conurbations in Denmark and Sweden, that previously discouraged FWDs, are now reassessing; as they find that separate kerbside collection of food waste is proving ineffectual in densely populated areas.

3. The international scientific community has conducted a vast body of studies into FWDs. 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 provided no comparable evidence. The oft cited Water UK paper has no referenced scientific base for its contentions. Neither Scottish Water nor Water UK has challenged the CIWEM findings.

4. The of issue FOG blocking sewers is a serious but entirely separate issue. Research and practical experience has consistently shown that FWDs do not contribute to FOG.

The suggestion that the costs incurred by the ban on food waste disposers are justified by lack of alignment with Zero Waste and EU policy objectives is not recognised in a vast established scientific evidence base, 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.

5. The Policy Statement, the Minister and Scottish Water, who called for a ban, all make reference to a Water UK paper on food macerators which has no basis in scientific fact. In contrast a comprehensive review of published scientific work, completed in February 2011, by the Chartered Institution of Water & Environmental Management (CIWEM) is ignored, yet it refutes all such speculation, stating that: "Food waste disposers are an environmentally acceptable option for separating food waste at source and conveying it to treatmentexclusive emphasis on kerbside collection of source segregated biowaste has been mistaken."

6. A report published by Defra in September 2011, The National Food Waste Programme, is often misquoted by the water industry. This desk study aimed to estimate the CO₂e and economic impacts of three options for managing food waste, including kerbside collection and food waste disposers, and it concluded that within the uncertainties of the data and the assumptions, and the recognised limitations of the modelling approach, the climate change and economic impacts of the options were similar. The authors acknowledge that the report is limited and "does not necessarily reflect the best available data". Evidence from the most recent peer-reviewed scientific field study, carried out

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

over a ten year period in Sweden², which was not considered in this report, demonstrates that in practice both the carbon and economic costs for FWD prove considerably (20 – 30%) lower than assumed in the National Food Waste Programme model.

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. We are also concerned that Scottish Water has a pecuniary interest in 'gate fees' arising from kerbside collection of food waste.

Our members are committed to maintain environmental diligence but are very concerned that the Scottish Government is proposing a ban on a proven method for managing and recycling food waste and embarking on a 'one solution model' for recycling food waste, when the time scales for meeting the Landfill Ban are so very short. We cannot understand, nor have we been given a reason for the proposed placing of a ban on equipment that is already helping Scotland meet its zero waste targets and which can make a larger contribution without the need for detailed planning requirements or complex logistical structures.

² Evans, T.D.: Andersson, P.: Wievegg, A.: Carlsson, I. (2010) Surahammar – a case study of the impacts of installing food waste disposers in fifty percent of households. *Water Environ. J.* 241 309-319