

FEA Response Environment Bill 2019-2020

Commons Committee Stage

19 June 2020

By email to: scrutiny@parliament.uk

Foodservice Equipment Association (FEA) is recognised as the largest and most influential foodservice membership organisation in the UK. We represent 200 member companies across fourteen product categories. Our remit encompasses the full spectrum of equipment and ancillary services; light equipment and tableware suppliers; including the main suppliers to all the foodservice and hospitality sectors of food waste and fats, oils and grease management. All FEA members are bound by our code of conduct which provides customers of the members with the confidence of binding undertakings on compliance, performance, hygiene, environment, product representation, installation and after sales support, servicing and maintenance. FEA has produced guides for members and their clients on food waste management in consultation with WRAP and the Scottish administration, to assist in meeting current and potential regulations. FEA is also a signatory of the Courtauld 2025 agreement.

The sector employs 10,000 people and has a turnover of £1.3 billion while exporting 10% of its production. The foodservice equipment produced by the sector is used for out of home eating and drinking in two main sectors. The primary sector includes; hotels, quick service restaurants, restaurants, pubs and bars. The secondary sector operators are; healthcare, education, public and community services, armed forces, leisure and recreation, workplace, visitor attractions, venues, travel, stadia and event catering and the food retail sector. Within the UK this customer base supplies 8 billion meals a year with a turnover of £52.7 billion rising to £70.7 billion if drink only servings are also included. This takes place through 450,000 establishments of which 268,000 are independent businesses.

As an association whose members have supplied the foodservice (catering) and hospitality sector for decades we are grateful for this opportunity to comment on those sections of the Environment Bill relating to the capture of unavoidable food waste and the potential for recovery of this valuable waste stream. These are key issues for our industry and we have worked closely with WRAP and the devolved administrations to both minimise food wastage and maximise recovery of unavoidable food waste in the catering and hospitality sector.

We are committed to supporting the government's waste to energy strategy and would like to propose amendments to the Environment Bill and support these proposals with this submission which highlights the breadth of operations and innovations in our sector to better manage commercial food waste from operators. This evidence demonstrates that any ambitious target for separate collections of commercial food waste must acknowledge the potentially crucial role our industry plays in producing solutions for capturing this difficult waste stream and recovering its intrinsic value, while maintaining hygiene in commercial kitchens.

Bill Amendments

We would propose that commercial food waste collection systems in England can be made more flexible and resilient by amending the Bill as follows:

Section 3 Waste and resource efficiency (Page 33)

Para 54 Separation of Waste

54 (4) Take out 'or' and add coma after composting and extend sentence as follows.. ' or utilising connected waste infrastructure'.

54 (5) amend to add (4) as amended after 'subsection'...

45 AZA England: separate collection of household waste from relevant non-domestic premises

(4) Amend to remove 'or' and add coma after composting and extend sentence to 'or utilising connected waste infrastructure'.

(5) Amend to add (4) as amended after 'subsection'.

45 AZB England: separate collection of industrial and commercial waste

(4) Amend to remove 'or' add comma between recycling and composting and add 'or utilising connected waste infrastructure'.

These proposed amendments would increase the flexibility of commercial and hospitality food waste management in England as well as in the devolved administrations, should they so decide; making the systems more resilient, as well as offering proven solutions for businesses, institutions and organisations where food waste collections often require special security. Prisons, schools, universities, hospitals and MOD properties are examples of such locations. Utilising existing waste infrastructure to manage food waste reduces the need for road transport, additional waste collections, vehicles and emissions. It also reduces the potential costs imposed on local authorities whilst encouraging new and innovative environmental solutions for commercial food waste.

Since the passage of the EU Waste (Framework) Directive in 2009, which introduced the waste hierarchy to EU and UK legislation, we have supported moves to minimise commercial food waste and maximise the recovery of food waste. However, we are concerned of the dangers of a defined 'single solution' approach using kerbside collection to manage food waste. A very important consideration in the commercial and hospitality sector is its highly diverse nature and the very location-specific challenges that arise in relation to food waste management, be this in a major shopping centre, a prison, an open air concert or high street shops. In response to these problems FEA members have developed innovative ways of managing the challenges, which have not required public subsidy. Some applications have now been constrained by aspects of the implementation of the directive, particularly in two of the devolved administrations. This is in part due to inflexible aspects of the EU waste hierarchy which need to be reviewed now that the UK has exited the European Union.

The commercial foodservice and hospitality sectors play an extremely important role in the English and wider British economy be it in the fabric of the high street, social interaction, as well as in the health care, education and public sectors. For many people it is their first experience of the workplace, offering jobs for all sections of society, ranging from basic skills to generating some of the nation's brightest innovators and entrepreneurs. Despite the impact that the COVID pandemic has on the sector it will nevertheless play an important role in providing employment to the young and old, as the country returns to a semblance of normality.

Even before the pandemic, shifting market dynamics were causing huge changes in the catering sector. One example is the large numbers of public house closures, a situation that will only be exacerbated once the country comes out of lockdown. Food waste management can be a significant cost for many catering businesses and we have alerted central government and devolved administrations that a 'single solution' approach can have detrimental impact on the success of catering outlets on every high street in the country.

A number of major industrial actors who benefit from supplies of kerbside collected food waste and the attendant public subsidies have argued against other forms of food waste recovery. This, despite innovation and many research streams showing that a 'single food waste collection system' may not be the optimal route for recovery or recycling. In the commercial catering sector the widespread adoption of grease traps, grease removal units and dosing systems combined with the application of food waste management equipment have removed many of the arguments used by organisations in past years. The recognition in 2017 by Water UK that 93% of all sewer blockages were caused by wet wipes and sanitary products¹ has helped to clarify many years of misleading information regarding the role of food waste management systems and equipment. Alongside these corrections are the innovations made in Sweden² and the Netherlands³ where mixed commercial and residential developments direct both blackwater and food waste through piped systems straight to wastewater and anaerobic digestion. The UK has the opportunity to harness this knowledge and expertise to the benefit of the integrated environmental objectives of the Bill.

In support of our proposals for amending the Bill, to ensure that the catering industry is not adversely affected, we believe that the following information should be considered. This draws on current scientific evidence to demonstrate the importance of establishing flexible and robust food waste systems for the catering sector whilst supporting the Government's waste strategy by being better prepared to cope with unpredictable events (such as those provoked by the current pandemic) along with other inevitable disruptions such as industrial disputes or local authority budgetary constraints.

Promoting solely separate collection of food waste will diminish the opportunity for a more successful policy outcome. The nation can hope to send virtually zero commercial food waste to landfill, but to do so viably and recover the biogas and fertilizer value, a range of methods must be adopted including FWDs, dewatering equipment, in vessel composting (IVC) and digester systems. All of these options are needed to match the requirements of specific catering outlets with the most appropriate systems tailored to their operational and working conditions.

¹ <https://www.water.org.uk/news-item/fine-to-flush-a-major-new-development-in-the-fight-against-fatbergs/>

² H. ²Kjerstadius, S. Haghghatafshar & Å. Davidsson (2015) Potential for nutrient recovery and biogas production from blackwater, food waste and greywater in urban source control systems, *Environmental Technology*, 36:13, 1707-1720, DOI: 10.1080/09593330.2015.1007089

³ <https://www.metropolismag.com/cities/buiksloterham-amsterdam-grassroots-planning/>

The commercial foodservice equipment sector is continually evolving to improve food usage and food waste recovery in conjunction with the site operators who need these services. Adopting a 'single food waste collection method' acts as a barrier to innovation and unlike industry solutions often rely on public subsidy.

The commercial catering sector employs 3.1m and had a combined turnover of £70bn in 2019. Over 60% of the 428,000 outlets are independent businesses. While major operators will have commercial waste contracts the smaller high street outlets will rely on local authorities. Any policy choices which increase costs for these outlets or places these businesses at risk, will have impacts that reflect on their local suppliers and jobs in their area. As the economy struggles to recover from the post- COVID recession these catering sector employers will have a vital role to play and anything which could further threaten their sustainability should be avoided. Especially as it is a sector that traditionally provides many young employees with their first work opportunities and experience.

Many smaller catering establishments, especially in inner cities, will lack waste storage space, either within premises or in any external yard where that exists. In such conditions weekly food waste collections can cause hygiene and pest issues. Where weather, industrial issues or unforeseen events delay food waste collections the problems are compounded with potential risks to customers, employees and surrounding residents. Any changes made would also create challenges for local authorities in the need for extra health inspections and increased enforcement costs.

Experience in the most environmentally aware nations such as Sweden now demonstrates that, at best, the performance of domestic and commercial kerbside collection of food waste plateaus at a 47% capture rate⁴. Utilising new and innovative food waste solutions increases the capture rate and prevents organic food waste entering landfill whilst encouraging new technologies to exploit the inherent value of food waste in the production of energy.

Under the circular economy wastewater treatment is increasingly viewed as a production line for energy and nutrient recovery. Today nothing is wasted. 'Waste' water is considered a rich source of naturally occurring resources⁵ -- biogas, soil nutrients, phosphates, nitrates and clean water. Various projects in European programmes such as H2020 Run4Life⁶ are exploring the best ways of exploiting these resources for energy recovery and 'natural' fertilizers, in various Northern European states including Sweden, Belgium, Germany and the Netherlands.

In the case of commercial use of food waste disposers, there have been concerns that the outputs may cause sewer blockages or encourage the formation of FOG. The issue of FOG has been largely resolved by wide-spread adoption of grease traps, grease removal units and the use of bioremediation.

Extensive current laboratory work at the University of Sheffield, funded by the Engineering and Physical Sciences Research Council (EPSRC), is showing fears of blockages from FWDs to be unfounded. It has already defined the precise characteristics of food waste particles emitted by FWDs for a wide range of typical foods, their settling or re-entrainment capacity and how they are transported through the sewer⁷. An interim report defines the characteristics

⁴ Ibid H. Kjerstadius et al (2015) DOI: 10.1080/09593330.2015.1007089

⁵ Ambulkar A. (2018) The Emerging Era of Wastewater Valuables. Water and Wastewater Treatment. <https://wwtonline.co.uk/Blog/the-emerging-era-of-wastewater-valuables>

⁶ <https://run4life-project.eu/about/>

⁷ Legge A., et al. (2018) Modelling of Food Waste Disposer particle transport through a sewer network. Proc. Urban Drainage Modelling Conference. Palermo, Sicily. September.

of ground particles for 18 common food types and permits the evaluation of any mix that represents a typical diet⁸ The current phase is examining the transformation of these particles as they pass through the sewer system and their potential contribution to biogas recovery. The work aims to provide a tool for local authorities and wastewater operators to measure the potential risks and benefits that FWDs can offer in specific wastewater systems.

An increasing body of evidence is demonstrating that where ground food waste is sent to sewer it enhances the recovery of energy and nutrients from wastewater. This is prompting re-assessment of co-digestion by countries such as Australia and Ireland. The addition of ground-up food waste in water from commercial kitchens has the benefit of a considerable uplift in biogas production and nutrient recovery at wastewater treatment.

Further to the above points FEA would caution against legislation which required local authorities to implement a 'one solution collection model' that would be impractical in many cases or which increases local authority costs, especially if they need to replace their diesel fleet of collection vehicles in a short time scale. Even before the COVID pandemic much of the catering and hospitality sector was under financial pressure. As lockdown eases it will be many months before the sectors' businesses recover and any attempt to pass on rising local authority costs will threaten businesses and high streets throughout the country.

With the evolution of the circular economy, innovations in technology such as those already in use in countries such as Sweden, will make it possible to overcome the challenges of source separation of food waste and the recovery of its inherent value. The Bill should review aspects of the waste hierarchy for the food service industry to permit the adoption of efficient innovations.

FEA would be pleased to provide further information on request.

A handwritten signature in black ink, appearing to read 'Keith Warren'.

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⁸ <https://zenodo.org/record/3697303#.XmBGUaj7TIU>