

Grow Elgin Community Composting and Waste Collection Research

Summary

REAP proposed collecting food waste from certain businesses and transporting it by electric bike to several small scale community composting sites. These sites would have compost heaps or bins already in use for garden waste i.e. 'open systems'. The food would be added to accelerate the heap and reduce carbon by; saving food waste collection and processing, or avoiding food waste going to landfill.



Our research found that this type of composting is allowed, but is regulated and required compliance needs to be in place before activity commences. In order to comply we had to:

- Apply to SEPA for an exemption to compost on a small scale (2m³ bin or heap) at specific sites, at least 21 days before work is due to commence (free of charge)¹
- Register as a professional carrier of waste with SEPA (free of charge)¹
- Collect only plant tissue waste i.e. unprocessed fruit and vegetables, peelings, cores and teabags (appropriate material to compost in an open heap, compared to kitchen or canteen food waste)
- Carry out a risk assessment
- Transport waste in robust, impermeable containers, within the robust, impermeable bike trailer which is large enough to act as the required secondary container or bund
- Fill in waste transfer records for every collection, giving a copy to the waste producer and keeping a copy - which may be audited - for two years
- Comply with advice on the final use of compost produced

Project proposal

To help reduce carbon and encourage interest in and knowledge about the benefits of composting, the 'Grow Elgin' project planned to:

- Set up composting sites at community gardens and use compost systems set up at project partner organisations
- Collect food waste locally and transport it by electric bike to these compost sites
- Use the resulting compost on site to support the growing projects



Regulations and Compliance

Collecting waste, composting and use of finished compost are controlled by legislation² that is generally enforced by the Scottish Environmental Protection Agency (SEPA). This includes work carried out by charities and voluntary organisations. They must register as professional waste collectors and apply for exemption from license depending on the type and scale of composting they are carrying out.

There is no charge to charities and voluntary organisations for small scale schemes that comply with regulations, but compliance must be in place and notification of start date must be given to SEPA in writing before any activities begin.

Community composting of garden waste only such as on allotments, attracts no legislation and home composting is not regulated.

Composting regulations

Different regulations apply to 'open' composting (bins or heaps) and 'closed vessel' composting (e.g. Rocket or Ridan composters). The type of composting chosen also affects the type of waste that may be composted.



'open' compost bin system



'closed' Ridan compost system

SEPA advises that kitchen or canteen waste, even if it is 'meat excluded' is not suitable for composting in an open heap. Only unprocessed fruit and vegetables and peelings and cores can be composted this way i.e. 'plant tissue' waste. Discovering this influenced which businesses and organisations we could collect waste from.



REAP applied to SEPA for a Paragraph 12 exemption to The Waste (Scotland) Regulations 2011³ and detailed:

- the type of waste to be composted
- the volume of compost heap or bin (maximum 2m³)
- the location of the heap (supplying an 8 digit grid reference i.e. locating it within a 10m² area)

Application must be made at least 21 days before the activity is to start. The date of the proposed start of activity can be added to the form, which could save delay once exemption is granted, if work is almost ready to commence. SEPA advise that an inspection will be carried out at the start of activities and if there are any complaints or concerns raised during the following 12 months. Exemption is granted for a year and must be re-applied for at least 21 days before expiration.

If the land where composting is proposed is not controlled by the waste collector e.g. owned or leased by them, they must ensure any required planning permission is in place.

Collection and transport of food waste

SEPA is also the enforcing authority for transport of controlled waste in Scotland. Controlled waste includes all commercial, industrial and household waste whether or not it contains toxic or hazardous substances.

Even if only handling such waste occasionally, charities or voluntary organisations must ensure they are listed on SEPA's register of professional collectors and transporters of waste. There is no charge for this type of registration. It is possible to register online via SEPA's website, although we found this system did not work for charities and we had to request a copy of the form which was sent to the regional office in Aberdeen. Notification of registration was received by post.

Record keeping

Two copies of a waste transfer note are filled in at each collection, noting the type and weight of waste collected. One copy is given to the waste producer and one is kept by the collector. Records must be kept for up to 2 years and are auditable. Some projects will also have to return an annual record to SEPA.

Transport containers

Primary containers must be robust and impermeable. Materials are not specified but containers should be repaired or replaced as soon as there are signs of damage.

A secondary impermeable container (bund or drip tray) that can fully contain any leaks from the primary container should also be used. There are regulations governing the size of outer to inner containers, but a local SEPA Environmental Protection Officer advised that at the proposed scale of operation, the requirement is for two separate levels of containment with the outer container a minimum of 1 litre larger than the total volume of the inner container or containers.

The bike trailer is made of sturdy plastic and is leak-proof. It has a volume of 90 litres and could be fitted with 2 leak-proof lidded containers with a total volume of 89 litres.



Depending on the needs of waste producers, REAP could collect a full caddy and leave an empty caddy behind.

Use of finished compost

SEPA also regulates use of finished compost. Compost is no longer considered to be a waste if it complies with PAS100 quality standards and has a market for use. PAS100 specification documents are publically available free of charge on application to WRAP via their website⁴. Compliance requires the compost reaching certain temperatures, daily recording of temperatures, and lab testing of samples for pathogens such as E. Coli 0157. The compost produced in this project will not meet PAS100 requirements and there would not be time to become compliant in the lifetime of this project.

Compost that does not comply with PAS100 quality standards is still considered to be waste and would need to comply with regulation concerning use of waste. It may be possible to register for exemption to use this kind of waste on land, subject to an expert making a statement about risks and how the compost will improve the land.

This would not apply where the compost will be used by a private householder on their garden or allotment, but this would mean further transport and record keeping of the waste and is beyond the scope of this project.

SEPA is seeking advice from their national Waste Team on the use of our compost, to help us find a pragmatic solution for such a small-scale operation. It may be the case that the compost breaks down rapidly in situ and is not spread on site.

References and Further Information

References

1. SEPA. *Application Forms and Guidance Notes*. Available: <http://www.sepa.org.uk/regulations/authorisations-and-permits/application-forms/#Waste>
(NB Registration online does not work for charities & voluntary organisations. Local SEPA office can supply a paper application form.)
2. Scottish Government. (2011). *The Waste Management Licensing (Scotland) Regulations 2011*. Available: <http://www.legislation.gov.uk/ssi/2011/228/contents/made>
3. SEPA. (2011). *Paragraph 12 Exemption*. Available: <http://www.sepa.org.uk/media/105248/wmx-tq12.pdf>
4. Waste & Resources Action Plan, Association for Organics Recycling & British Standards Institute. (2011). *PAS 100:2011 Specification for composted materials*. Available: <http://www.wrap.org.uk/content/bsi-pas-100-producing-quality-compost>

Further Information

Zero Waste Scotland Ground Floor, Moray House, Forthside Way, Stirling, FK8 1QZ

Tel: 01786 433 930 <http://www.zerowastescotland.org.uk/>

SEPA <http://www.sepa.org.uk/>

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WRAP (Waste & Recycling Action Plan) <http://www.wrap.org.uk/>