

Waste Quality Protocols Review -

Quality Protocol: Biomethane from waste

Call for evidence

Background

Quality Protocols (QPs) are end of waste frameworks that are used by Industry on a voluntary basis to identify the point at which waste, having been fully recovered, may be regarded as a non-waste product. This means the waste derived material can be used in specified markets without the need for waste regulation controls. The QPs are waste specific. We have started to review the QP for Biomethane from waste. We would like to hear Industry's views on how this QP is working and whether it meets Industry needs.

At this time, we are purely gathering information and views which we will take into account when deciding whether to maintain or withdraw support, for the QP in their current form. If support is withdrawn OR it is deemed necessary to complete a revision of the QP then further, more detailed, calls for evidence will take place at that time.

What do we need?

We would like your views on these current QP as follows:

- Issues of clarity - Is the text of the QP clear?
- Any abuse of the QP that you are aware of - Please specify what the abuse is and if possible provide evidence.
- Are there any aspects of the QP that you find onerous to meet and why?
- Are there any aspects of the QPs that you find too lenient and why?
- As it stands, do you think that even if the QP is followed it nevertheless creates a risk to the environment and/or human health, if so why? E.g., gas management and compliance with The Dangerous Substances and Explosive Atmospheres Regulations 2002 (DSEAR). Can you provide any evidence?
- Are there developing or new waste processing technologies that could be included in the QP? These could be newly emerging technologies which have developed after the QP was published, or pre-existing technologies that were not included in the original QP design. Please provide evidence of their efficacy and end market.
- In relation to the QP are there any uses and/or new end product markets that have developed since original publication which could be added now?
- In relation to the QP has there been any revision of or developments relating to the product standards set out in the QP relevant to the use(s)? Have there been any new product standards published since original publication of the QP which you believe should be included?
- Are there any other relevant issues you wish to raise in relation to the QP?

At this point no decision has been made as to whether we will continue or withdraw our support for this QP. We would like your input so we can take this into account when we make that decision.

As well as the responses to the above questions, we would appreciate your views on the QP specific issues previously raised by Environment Agency staff below. Any evidence you can provide to support your views would also be welcomed.

Biomethane from waste QP:

- Do you think the remote injection of gas to the national gas transmission system at hub sites should be added to the Quality Protocol? If so, please give your reasoning.
- Do you think measures requiring provision for increased gas storage at sites should be added to the Quality Protocol to prevent disposal at times of low demand? If so, please give your reasoning.
- Are you aware of whether the Quality Protocol is currently being utilised or may be utilised in the future by the landfill sector? If so, please provide details.
- Do you think the scope of the Quality Protocol should be altered to exclude biomethane arising from landfill sites? If so, does this raise additional considerations that would need to be considered as part of this review? If so, please provide details.
- Within the scope of this review, we are examining Regulatory Position Statement 255 which relates to treating, storing, and using carbon dioxide from anaerobic digestion. [Treating, storing, and using carbon dioxide from anaerobic digestion: RPS 255 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/treating-storing-and-using-carbon-dioxide-from-anaerobic-digestion-rps-255). Are you aware of whether this RPS is being used, and if so please provide evidence?
- The Environment Agency is considering withdrawing Regulatory Position Statement 255 and instead incorporating the provisions relating to carbon dioxide into the Biomethane Quality Protocol. Would you support this? Do you think a specification for carbon dioxide should be set as part of this?

How to contribute

Please e-mail your comments/evidence to resourcesframeworks@environment-agency.gov.uk with the title "Biomethane QP Comments" in the title/subject box.

The deadline for getting comments back to us is Friday 3rd February 2023.

Issued - 11th November 2022