

REGULATORY CONTROLS IN THE UK

To ensure biosecurity those dealing with animal by-products (ABPs) must abide by strict rules for their storage, collection, transport, processing and disposal and the use of ABPs derived products. For processors of ABPs there are also environmental regulations covering installation permitting to control emissions and consumptions and waste regulations. UK regulations and regulators are summarised in Figure 1.

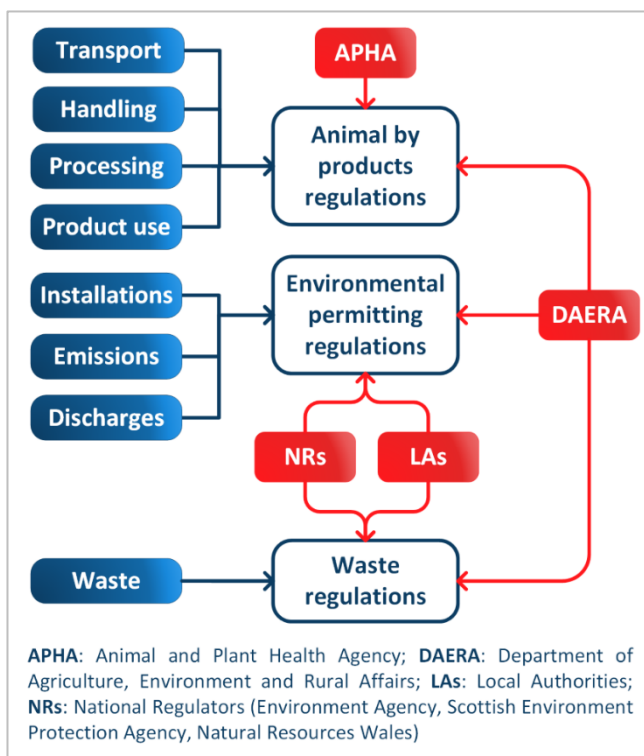


Figure 1 – UK ABP regulators and regulatory controls

ANIMAL BY PRODUCT REGULATIONS

Health rules for ABPs and derived products not intended for human consumption are laid down in the ABPs Regulations¹ which are implemented in England, Wales, Scotland and Northern Ireland by individual Statutory Instruments.

There are rules on the segregation of slaughterhouses from ABP processing premises; separation of clean and unclean areas and general hygiene requirements.

Three categories of ABP material (1-3) are defined, based on risk and materials of different categories must be kept separate and processed in dedicated plants - refer to the factsheet *What are Animal By-Products*².

ABPs processing must take place in a plant that has been validated against an approved method, of which there are seven, depending on material category. Each processing line must have a separate APHA/DAERA approval which specifies the processing method and operating conditions (e.g. particle size, temperature, time and pressure). Some methods require validation to prove pathogen destruction and routine testing of processed material is undertaken to check for pathogens³.

Incineration of ABPs is also regulated under ABPs Regulations and must be approved by APHA.

Products derived from ABPs are tightly controlled under other ABP-related regulations to ensure they are only used in authorised applications. Intra-species feeding is banned as an essential control in the eradication of BSE.

Veterinary inspections are undertaken at processing facilities and export health certificates for ABPs-derived products must have veterinary approval (refer to Factsheet *Outlets for Animal By-products Derived Products*⁴).

ENVIRONMENTAL PERMITTING REGULATIONS

Rendering, anaerobic digestion, composting and incineration activities are prescribed in the EU Industrial Emissions Directive (IED) and they must be permitted if on a scale above the defined capacities.

In the UK, the IED was implemented through amendments to legislation in the devolved administrations:

- The Environmental Permitting (England and Wales) Regulations (EPR)
- The Pollution Prevention and Control (Scotland) Regulations (PPC)
- The Pollution Prevention and Control (Industrial emissions) Regulations (Northern Ireland) (PPC)

Installation permits are issued and enforced by the National Regulator. England and Wales operate a two-tier system with higher risk/more complicated processes (A1) regulated by the Environment Agency (England) and Natural Resources Wales, and lower risk/simpler processes (A2) regulated by Local Authorities. Scotland and Northern Ireland operate separate single tier systems with all Part A activities regulated by the Scottish Environmental Protection Agency and the

Department of Environment Northern Ireland respectively.

Installation Permit conditions cover process techniques, procedures and emission limit values. These are based on Best Available Techniques (BAT), as defined in Article 3 of the IED:

- **Best:** Most effective in achieving a high general level of protection of the environment as a whole;
- **Available:** Developed on a scale which allows implementation in the relevant industrial Sector, under economically and technically viable conditions;
- **Techniques:** Including technology, design, maintenance, operation and decommissioning.

Mandatory BAT Conclusions are issued for each prescribed industrial sector. These aim to reduce emissions from processes and also address energy and resource efficiency (water consumption, re-use and recovery of materials), prevention of accidents, noise and odour. BAT Conclusions are linked to EU BAT Reference Documents (BREFs) - a summary of the applicable BREFs for processors of ABPs is in Table 1.

Table 1 - Applicable BREFs for ABPs processors

Date	BREF and activities covered
Not issued at Brexit	Slaughterhouses and Animal By-products (SA) Rendering, blood and feather processing, gelatine, fat melting, slaughterhouses
Aug 2018	Waste Treatment (WT) Anaerobic digestion, composting
Dec 2019	Waste Incineration (WI) Carcass incinerators, meat and bone meal (MBM) incineration (Combustion of MBM as a fuel will be within scope of the SA BREF)
Jul 2017	Large Combustion Plant (LCP) Boilers, thermal oxidisers, engines
May 2016	Common Waste Water and Waste Gas Treatment/Management Systems in the Chemical Sector (CWW) Wastewater treatment and waste gas treatment

A UK BAT approach is being considered for sectors that had no BAT Conclusions set before the UK left the EU. For these sectors BAT is currently based on the first series of BREF documents and on UK regulatory guidance. For rendering the most applicable UK Guidance is SG8⁵.

WASTE REGULATIONS

ABPs sent for rendering are not classed as waste and are only covered by the ABPs Regulations. Products from rendering that are combusted for energy recovery are covered by both ABPs and Waste Regulations unless

subject to an approved *End of Waste* determination by the Regulator (see Table 2).

Any ABPs sent for incineration, composting or anaerobic digestion come under both the Waste Regulations and the Animal By-products Regulations and cover material transport and facility operation.

Manure is not a waste when sent on its own for anaerobic digestion, composting or for direct use as a fertiliser. It does become waste if it is mixed with gut contents or other wastes sent for these applications.

Sludges, gut content and liquid products from rendering, anaerobic digestion and composting are classed as wastes by UK Environmental Regulators and rules for their use for soil improvement by land application vary across devolved countries. Some Regulators require deployment permits.

Table 2 - Summary of ABPs and Waste Regulations

ABPs Regs only	ABPs and Waste Regs
ABPs sent for rendering	ABPs sent for anaerobic digestion and composting
ABP-derived products from rendering used in combustion for energy recovery if subject to an End of Waste approval	Gut contents, liquid products from rendering, composting and anaerobic digestion sent for landspreading as soil improver
Manure, milk, colostrum and clean eggshells sent for anaerobic digestion, composting or landspreading as fertiliser unless mixed with other wastes	ABPs sent for incineration

REFERENCES

1. Commission Regulation (EC) No 142/2011 implementing Regulation (EC) No 1069/2009
2. What are Animal By-products?, Factsheet – FABRA-FS-001
3. FABRA UK - Review of Best Practice in UK Animal By-Products Industries (November 2017)
4. Outlets for Animal By-products Derived Products, Factsheet FABRA-FS-008
5. Sector Guidance Note IPPC SG8 - Integrated Pollution Prevention and Control (IPPC) - Secretary of State's Guidance for the A2 Rendering Sector Nov 2008 (Revised Dec 08)

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