

Interim Guidance on the Outputs from Anaerobic Digestion of Fish Waste

Background

This guidance relates to the classification of the digestate from AD plants that treat fish mortalities (morts).

Fish Morts and Animal By Products Rules

Fish morts are animal by-products (ABPs). ABPs are entire animal bodies, parts of animals, products of animal origin or other products obtained from animals that are not fit or intended for human consumption. They must be dealt with in accordance with strict regulations designed to prevent harm to people, animals and the environment. These regulations are the EU Animal By-Product [Regulation 1069/2009](#)¹ (ABPR) and the accompanying implementing [Commission Regulation 142/2011](#)². These regulations are enforced by The Animal Health and Veterinary Laboratories Agency (AHVLA).

These regulations split ABP into three categories based on the risk to animal and human health. Fish morts can fall under two categories:

- Category 2 material includes animals and parts of animals, other than category 1 or 3 material, that died other than by being slaughtered or killed for human consumption, including animals killed for disease control purposes;
- Category 3 material includes aquatic animals, and parts of such animals, except sea mammals, which did not show any signs of disease communicable to humans or animals; and animal by-products from aquatic animals originating from establishments or plants manufacturing products for human consumption;

Fish farm mortalities would normally be classified as category 3 materials. They would only be classified as category 2 materials if they were considered to be showing signs of communicable disease. Waste from fish processing plants such as heads, trimmings and off cuts would be a category 3 material.

The ABP definition of the waste is up to the consignee, i.e. the fish farm operator or the fish processor. If necessary they should seek veterinary advice on the most appropriate category, i.e. if the fish are disease-free or not.

Fish Morts in AD Processes

The ABPR set out the options for use and disposal of the various categories of ABPs. Category 2 materials can be treated in approved AD plants although certain specified material must be pretreated first, usually through rendering. Article 13(g) states that category 2 material originating from aquatic animals can be ensiled, composted or used in an approved AD plant without

¹ Regulation 1069/2009 - <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:300:0001:0033:EN:PDF>

² Commission Regulation 142/2011 - <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2011:054:0001:0254:EN:PDF>

pretreatment. All category 3 material can be composted or treated in an AD plant without pretreatment. In this context “approved plant” means an ABP treatment plant that has been approved under the ABPR by AHVLA.

End of Waste Considerations

SEPA has a position statement detailing when waste controls will be applied to the output from AD plants³. Part of this position places controls on the inputs to the process to ensure that the resulting digestate is suitable for use on land. Input materials must be source segregated biowastes and/or source segregated biodegradable materials. These include, but are not restricted to, wastes listed in Appendix B of the WRAP/Environment Agency’s “Anaerobic Digestion Quality Protocol” (ADQP). The current version of the ADQP restricts the use of category 2 ABP to those that have been pretreated prior to AD. This goes beyond the requirements of the ABPR and is in the process of being revised to bring it into line with the European requirements, i.e. to remove the requirement to pretreat all category 2 material and to allow specified material, including that arising from aquatic animals, to enter the AD process without prior processing.

SEPA Position on the Use of Fish Morts in AD plants

In the interim period, until the ADQP is revised, the SEPA position on digestates from AD plants accepting category 2 and 3 fish morts without prior processing is that they will not be regarded as waste providing the following requirements are met:

- all criteria in the SEPA position on the use of PAS110 digestate are met
- the AHVLA have issued the appropriate approval for the premises and are satisfied that the plant can handle the material
- the PPC permit allows the treatment of the material
- the local SEPA officer is satisfied that the site can handle the material without giving rise to unacceptable risks of harm to human health or damage to the environment.

This statement applies only in Scotland. The terms of this statement may be subject to periodical review and be changed or withdrawn in light of technological developments, regulatory or legislative changes, future government guidance or experience of its use. SEPA reserves its discretion to depart from the position outlined in this statement and to take appropriate action to avoid any risk of pollution or harm to human health or the environment.

Useful Links

AHVLA <http://www.defra.gov.uk/ahvla-en/>

Scottish Government Animal By-Products pages:

<http://www.scotland.gov.uk/Topics/farmingrural/Agriculture/animal-welfare/ABPs>

SEPA Classification of Outputs from Anaerobic Digestion Plants:

http://www.sepa.org.uk/waste/waste_regulation/idoc.ashx?docid=e2cfd0f4-6fc5-4cab-af13-aa94e506af0b&version=-1

WRAP/ EA “Quality protocol for the production and use of quality outputs from anaerobic digestion of source-segregated biodegradable waste”:

[http://www.environment-agency.gov.uk/static/documents/Business/W524AnaerobicDigestatev4\(1\).pdf](http://www.environment-agency.gov.uk/static/documents/Business/W524AnaerobicDigestatev4(1).pdf)

³ Position Statement - Classification of AD process outputs (WST-PS-016)
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