

Residual Waste Team,
Defra,
Area 2B, Nobel House,
17 Smith Square,
London,
SW1P 3JR

6th May 2014

Subject: Call for Evidence- Refuse Derived Fuel (RDF) Market in England

Dear Sir / Madam,

Gafta is the association representing the trade in agricultural commodities and general produce, established in 1879. Our UK members have raised different issues around RDF with the Environment Agency who have in turn drawn our attention to the Defra call for evidence on this topic.

Gafta's raw materials committee discussed many issues particularly around quality and storage of RDF at different ports across UK. Although the questions are not directly related to the grain and feed trade, we would like to send some more general comments relating to questions 8 and 9 below.

Policy changes and targets that might affect RDF

Q8. What evidence do you have on suitable intervention measures for addressing the issues regarding the stockpiling of RDF?

Costs/ burdens

Q9. What evidence do you have on different approaches to delivering an intervention e.g. legislation, enforcement guidance and the implications for delivery via that route e.g. new burdens and costs?

We are aware that there is a UK regulatory position in place but Gafta members would support the development of more specific UK legislation to deal with the increasing volumes of RDF. Our members are very concerned about the rise in exports and storage of RDF across the UK, from nearly 0t in 2010 to 1.5 mt in 2013 (f) and the poor operating standards witnessed in ports where our feed materials are also stored.

In our view, current rules are not strict enough and the RDF sector needs to comply with obligations under food and feed hygiene, TSE etc. The animal feed trade supports a more clearly defined definition of RDF, minimum treatment requirements and strict enforceable legislation on proximity issues due to the bad experiences already experienced by our members. Similarly, provisions should ensure that companies do not go bankrupt so RDF is not left in ports indefinitely. The obvious concern of our members is meat and bone meal and our understanding is that this untreated waste could potentially contain this and be a cause of contamination.

Gafta members are aware of UK government policy on waste and support its development but remain concerned that in relation to RDF, our feed materials are not put at risk.

Gafta would also appreciate being kept informed of results from the call for evidence and any future discussion on Defra's policy in this area.

Yours sincerely,

A handwritten signature in black ink that reads "June Arnold". The signature is written in a cursive, flowing style.

June Arnold
Head of Policy