

## Seeding of anaerobic digestion plants

**If you comply with the requirements below, we will allow the use of digestate, slurries and sewage sludge as a source of bacteria to activate the anaerobic digestion process.**

### Background

Anaerobic digestion (AD) is a process which harnesses natural bacteria to treat biodegradable materials such as agricultural manure and slurry, food waste and waste water treatment sludge. To start the AD process the digester has to be “seeded” with biologically active sludge. The seeding process produces the population of methanogenic and acid-forming bacteria required for the AD process to work effectively. AD plants require seeding when they are initially commissioned.

There is currently no provision in the standard rules permits or the waste exemptions to allow the use of waste water treatment sludges or other biologically active sludges to seed AD plants.

### Our position

We will not pursue an application for an environmental permit to use waste water treatment sludges<sup>1</sup> or biologically active sludge from the AD process<sup>2</sup> or farm slurry<sup>3</sup> to seed AD plants provided :

- The following details are sent to the local Environment Agency office:
  - the date the seeding of the plant will start
  - the duration of the seeding process
  - the quantity of sludge or slurry which will be used in the seeding process
  - the process producing the seeding sludge
  - details of the site that has produced the sludge or slurry.

We must receive this information at least five working days before the seeding begins.

- Any digestate from an AD plant that has used waste water treatment sludges in commissioning is used in accordance with the [Safe Sludge Matrix](#).
- The Duty of care is complied with and transfer notes are kept for a minimum of two years.

<sup>1</sup> List of Waste (LoW) code 19 08 05

<sup>2</sup> LoW codes 19 06 05 and 19 06 06

<sup>3</sup> LoW code 02 01 06

- you meet the relevant objectives of the Waste Framework Directive;  
'... ensuring that waste is recovered or disposed of without endangering human health and without using processes or methods which could harm the environment and in particular without –
  - (i) risk to water, air, soil, plants or animals; or
  - (ii) causing nuisance through noise or odours; or
  - (iii) adversely affecting the countryside or places of special interest.'

### **Enforcement**

We will not normally take enforcement action for the activities described in this regulatory position except where the activity has caused, or is likely to cause, pollution or harm to health. For a more detailed explanation of this enforcement position, reference should be made to the Public Interest Factors as described in the **Guidance to the Enforcement and Prosecution Policy**. This can be found on the '[How we Regulate You](#)' page in the Business & Industry section of our web site.

### **Further advice**

Guidance on all the waste exemptions and how to register them can be found on our website at: [www.environment-agency.gov.uk/exemptions](http://www.environment-agency.gov.uk/exemptions)

Please note that using waste water treatment sludges 19 08 05 to seed an AD plant may affect compliance with the [Quality Protocol for Digestate](#).

This regulatory position will be reviewed during December 2012.

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