

Regulatory Position Statement

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 without the need for a permit.

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. Also, if waste sludges were to be used to seed AD plants taking in only non-wastes such as energy crops, this would bring the AD under regulatory control.

Our approach

We will not pursue an application for an environmental permit to use waste water treatment sludges¹ or biologically active sludge from the AD process² or farm slurry³ 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.

1 List of Waste (LoW) code 19 08 05

2 LoW codes 19 06 05 and 19 06 06

3 LoW code 02 01 06

- You meet the relevant objectives of the Waste Framework Directive;
'... ensuring that waste management is carried out without endangering human health, without harming the environment and in particular:
 - (i) without risk to water, air, soil, plants or animals;
 - (ii) without causing a nuisance through noise or odours; and
 - (iii) without adversely affecting the countryside or places of special interest.'

Enforcement

In not pursuing an application for a permit, we will not normally take enforcement action unless the activity has caused, or is likely to cause, pollution or harm to health. For a more detailed explanation of this enforcement position, please see our [Enforcement and Sanctions](#) statement. This can be found on the '[How we regulate you](#)' page in the Business & Industry section of our web site.

This regulatory position will be reviewed by April 2015.

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This document is out of date and has been withdrawn (03/05/2016)

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