

Dear Steering Group member,

Thank you for pulling together the attached industry representatives' proposal to refine the existing limit level for the RBP test. Having discussed this within the Environment Agency and with SEPA, we are in agreement that whilst we cannot endorse or support the proposal document as such, we would like to make the following points:

- we agree that both cow slurry and pig slurry appear to be suitable "virgin comparators"
- we agree that there is a case to 'refine' the existing RBP limit level
- we note that the proposal doesn't address the possible option of changing the RBP test from a 28-day to a 10-day test, as raised in WRAP's RBP test review report and as discussed at the Steering Group meetings
- we note that industry steering group members have said that they don't want the RBP limit to be as high as the RBP of pig slurry
- we note from steering group discussions that industry representatives have called for the RBP limit to be 'refined' to 0.4l/kg VS
- we note in particular, from page 9 of the proposal "The data obtained from RBP testing has shown that 0.4 l biogas/g VS is a level that AD operators registered on the BCS can reasonably achieve, but even achieving that level remains challenging and that there may be occasional spikes measured at higher levels."

On this basis, therefore we would not object to the rolling average approach given as option 1 of your document, but with the rolling average set as 0.4l/kg VS and a maximum level of 0.5l/kg VS. We consider that the rolling average should not be completely open-ended but should be limited, for example, to results within a maximum 12 months period, or to the last 3 results, depending on the frequency of testing.

We can see the advantages of changing to a 10-day RBP test and would support such a move, but of course this would mean that the RBP limit value would have to be reduced accordingly.

Regards, Viv

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