

Veolia's feedback on the draft.

Veolia finds this draft document good in general and a significant step forward. We have one comment and some points of improvement for the draft Beneficial Use of Organic Waste Products on Land.

The comment is around the word "waste". The committee has asked whether the word "waste" is appropriate or that it should be replaced with another term with a more positive connotation. We feel that the word "waste" must stay in the title. It is true that the (by)products that are the subject of the guide have many potentially positive properties, but the people who will look this guide up on the internet and consult it typically have a problem with something they need to get rid of. Items people need to get rid of are typically called waste. If the word waste is removed from the title the document becomes hard to find as people that are in search for it will search on the keyword "waste". Removing the word "waste" may partially defeat the purpose of the guideline.

There is nothing against using the remainder of the document for starting the terminology mind shift though.

Points of improvement: We suggest rewriting parts of Section 5. section 5.1.2.1. mentions:

"A product is classified as stabilisation Grade A standard if:

- 1) The product has a documented quality assurance system; and
- 2) The product has undergone at least one of the pathogen reduction processes listed in Table 5-2; and
- 3) The product has undergone at least one of the listed vector attraction reduction methods listed in Table 5-3; and
- 4) The product meets all listed product pathogen standards (refer 5.1.2.3) after processing but prior to application."

Items 2 and 4 in this list have overlap and we believe that in most cases item 4 is the tighter requirement. We suggest removing item 2 from this list, but addressing pathogen reduction processes (including Table 5.2 which now looks a bit lost) after 5.2.1.3.

Page 18, middle of page: Instead of repeating the content of table 5.4 a reference would do.

Table 5.6 is confusing in multiple aspects. We suggest replacing it by something along the following lines:

Process	Grade A pathogen reduction	Vector attraction reduction	Stabilisation
Pasteurisation	Likely	No	No
Vermicomposting	Continuous verification needed	Yes	Grade B (Grade A)
Anaerobic digestion - mesophilic	No	Yes	Grade B
Anaerobic digestion - thermophilic	Continuous verification needed	Yes	Grade B (Grade A)
Thermal drying – plug flow	Likely	Yes	Grade A
Thermal drying – continuous mixing	Continuous verification needed	Yes	Grade B (Grade A)

Explanation:

- The column "Stabilisation" must be moved to the right because stabilisation is a function of whether the two previous boxes can be ticked.
- As there are two grades of stabilisation it does not make sense to state Yes or No. The grade must be mentioned
- Grade A pathogen reduction cannot be simply Yes or No as there is a requirement of continuous demonstration of compliance. "Likely" is the best classification that can ever be obtained.
- Even if all occasions of "Yes" in this table would be changed to "likely" it is still too positive:

- Vermi-composting: in the lines above the table it is mentioned that continuous verification is needed. The table itself should not conflict with that statement
- Processes that involve mixing can involve forward mixing which means that elements of the feedstock is not sufficiently long exposed to the elevated temperature. Even though on *average* the exposure time suffices, there will be a residence time distribution putting a portion of the flow into non-compliance.
- It is not understood what "Air Drying" means. Please clarify. If this is solar drying in a glasshouse then the grade A pathogen reduction would be similar to vermicomposting.