Second and Final Draft Good Practice Guide for the Beneficial Use of Organic Waste Products on Land

Submission by WasteMINZ Organic Materials Steering Group

09 March 2018

- 1. Guidelines for beneficially reusing organic materials on productive land are under development. The guidelines will supersede 2003 Guidelines for the Safe Application of Biosolids to Land and include additional organic material such as animal manures, and other agricultural wastes, which also contain pathogens and contaminants. Water New Zealand, WasteMINZ, the Centre for Integrated Biowaste Research (CIBR) and the New Zealand Land Treatment Collective (NZLTC) together with the ministries of Environment, Health and primary Industries are collaborating on their delivery
- 2. Nick Walmsley ran five (5) regional meetings to discuss a draft during February 2017, which over a hundred (100) people attended. Twenty-three (23) submissions from thirty-six (36) individuals and organisations were subsequently received. The project Steering Group held a meeting to consider these submissions on 27 April 2017 and formulated a programme to update the draft.
- **3.** The updated draft documents are now available for further public comment. Submissions on this second draft will close at 5pm Friday, 9 March 2018. It is intended that the guidelines will be published by mid-2018
- 4. The Organics Materials Steering Group (OMSG) acknowledges and commends the pragmatic and enabling approach that has been undertaken to development of the proposed guidelines. The OMSG embraces this approach and views this as a significant positive step forward from the current 2003 Guidelines, specifically determining application rates for agriculture based on nitrogen content and soil/crop requirements.
- **5.** This approach recognizes the agronomic value of organic materials and the benefit these have to future proofing our soils vs current heavy reliance on chemical fertilizers.
- **6.** Following from the OMSG submission on the first draft of the guidelines back in March 2017, two further considerations would like to be raised as part of a submission on the second draft and final of these guidelines:

Enabling metal limits, specifically zinc levels

7. The proposed limit is 180ppm for urban soils. The intent of the revised guidelines is to enable and support use of organic products to land. However, the 180ppm limit will become a barrier for some organic materials to be applied to land. In order to ensure that products produced from organic wastes are useable in all environments, specifically urban ones, the OMSG recommends that an Eco-SQV limit for zinc should be 300ppm.

The 300ppm comes from the soil limits in the 2003 Biosolids Guidelines which is considered more appropriate by the OMSG and also reflects the current Asure Quality used for organic certification for compost.

Further products to be included

- **8.** Further the OMSG believes that digestate should be specifically referenced as an organic material which can be directly applied to land. Digestate is a commonly produced end-product of wet anaerobic digestion (wet AD) plants that process food, biosolids and organic materials. The end-product can be directly injected into soils for agriculture and farming use to improve productivity and fertility.
- 9. The United Kingdom has over 350 wet AD plants in operation, processing food, biosolids and organic materials. These plants may either singly or co-digest multiple organic products. The OMSG believes that the guidelines need to be cognisant of this and support future digestate application which may include a food/organic biosolids blends.
- 10. It is likely as the waste landscape changes in New Zealand over next decade with potential increases in landfill costs and levies, that a wider range of products may be applied to land such as compost like products from mechanical biological plants and floc/fluff from mechanical heat plants. In Australia such products are being used as low-grade soil amendment for example for mine and landfill rehabilitation) It is vital that these guidelines enable the appropriate diversion of waste from landfill, encourage resource recovery and the appropriate use of organic materials to support healthy soils and a more sustainable New Zealand.