

“We agree with Neil Parish and Mel Stride MP that small scale, on-farm AD is of great benefit to UK farmers and urge policy makers to provide more support for its development across Britain. Large scale, industrial AD also has a critical role to play, however, meeting the UK’s need for domestically produced green gas. Of course, all AD plants need to be sited appropriately to minimise impacts on the environment and residents. To support operators with the application of best practice on their site, ensuring that the plant operates to good standards of health and safety, environmental protection, and respect for the local community, ADBA has developed the [AD Certification Scheme](#) (ADCS). It is not correct to say that AD plants emit odour – well run sites meeting ADCS criteria should not emit odour.

On the issue of traffic, in addition to ensuring AD plants are sited appropriately, we recommend applying the Danish model by which operators employ drivers from within the local community to drive biomethane-powered trucks – this ensures that they will take the local environment and community into greater consideration and that air pollution is significantly reduced.

On the broader issues mentioned in the MPs letter, we would like to clarify that:

1. only a very small proportion of feedstock for AD comes from energy crops. Around 90% of the feedstock used for AD consists of organic wastes, such as crop residues, manures, slurries, food waste and sewage. Therefore, contrary to popular belief, AD does not take edible food away from people in need. Additionally, we promote the widespread use of rotation cropping (i.e. using the same piece of land in turn to grow food crops and energy crops), which not only helps to regenerate the soil and improve yields, but also to address problematic pests and weeds naturally.
2. by capturing and treating organic wastes (which emit methane and other harmful greenhouse gases into the atmosphere when left to rot on landfill) and transforming them into valuable bioresources (biogas for electricity, biomethane for heat and transport, a biofertiliser to return nutrients and organic matter back to soil, and much needed bioCO₂), AD offers a critical solution to the urgent issues of climate change and energy and food security for the whole country.

To decarbonise the economy and increase our energy and food security, we need every lever at our disposal. AD is one of the key levers that can deliver these in the short term, without depriving anyone of food – indeed, where AD is deployed on farms, it is found to increase food yields.

The food shortages in the world are, as Amartya Sen concluded in his groundbreaking work on famine (1), an economic issue. In the UK, we waste one third to half of all food produced, which is scandalous. Reducing food waste in the first place, redistributing what can be redistributed and ensuring that remaining inedible food waste is processed through AD - as illustrated by the WRAP Food and Drink materials hierarchy (2) - is what policy makers must promote, and we welcome the mandatory implementation of separate food waste collections across Britain from 2024 as a crucial factor in achieving this.

We would also like to point out that whilst the letter focusses on the food crisis, it ignores the fact that AD in fact helps to address many other crises affecting everyone in the community: the CO₂ production crisis, the fertilizer cost crisis, the gas supply from Europe crisis and of course the climate change and energy security crises. AD works across multiple sectors and for that reason plays a crucial role in establishing a sustainable, circular economy in the long term that will be of benefit to both local communities and society at large.”

1. Poverty and Famines: An Essay on Entitlement and Deprivation – Amartya Sen. 1990.
- 2.

Food and drink material hierarchy

Most preferable option

