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Date: 6th July 2017

Ref: Bioresources and water resources market information consultation

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**Ofwat consultation
Bioresources and water resources market information**

The NFU represents 55,000 farming businesses in England and Wales involving an estimated 155,000 farmers, managers and partners in the business. In addition we have 55,000 countryside members with an interest in farming and the country. The NFU welcomes the opportunity to respond to the Ofwat consultation on Bioresources and water resources market information.

We are particularly interested in the proposed market information requirements for bioresources and the information that Ofwat is asking companies to publish to enable potential market participants to identify opportunities to supply services in treatment, transportation and disposal of bioresources.

This issue is very relevant to the NFU and its members because around 75% of the 1.1 Mt of sewage sludge produced in England and Wales on an annual basis is used on agricultural land. The use of sewage sludge on farm as a fertiliser, under safe conditions for human health and the environment, is a good opportunity to reuse valuable nutrients on land. Reserves of nutrients such as phosphate are under continued pressure. Therefore use as a fertiliser is a good reuse that also achieves aims outlined within the European Commission's circular economy package.

Please be aware that we are not going to respond to all of the questions set out in the consultation. We will respond to question 2, which directly relates to our member concerns on the proposed market information requirements for bioresources.

Question 2. Is there any additional information which it would be helpful if companies published for (i) bioresources and (ii) water resources (within the remit of Condition M1)? Please explain why.

(i) We understand that the point behind making market information available on bioresources is that it should help increase trading between incumbent water companies and between incumbents and third parties.

We are concerned that a lack of availability of some information may have a detrimental impact on sewage sludge quality. For example, we note from the Bioresources Market Information Guidance document that much of the information about sludge quality need not necessarily be supplied, but is optional. However, the availability of much of this type of information, (i.e. whether it is the measured dry solids; the treatment classification; whether the sludge has been screened or de-gritted or has unusual constituents) would appear to be very important to ensure any traded sludge is treated, transported or disposed of appropriately.

In addition, we believe that membership of the Biosolids Assurance Scheme (BAS) will help maintain a high product quality and consistency across the industry. The BAS has been established with collaboration from the majority of incumbent water companies to improve and homogenise the quality of sludge spread to land. An increase in companies who undertake these operations, particularly where sludge is not the primary waste type they treat, could undermine these developments and risks sludge being provided to farmers and landowners that has not been properly treated. Any new operators

should be required to demonstrate competence in sludge treatment and delivery by complying with this scheme.

If you would like to discuss these points further, please contact Diane Mitchell.