

Biofertiliser Certification Scheme Spring Newsletter May 2020



The Biofertiliser Certification Scheme (BCS) has been established as a robust quality assurance and end-of-waste scheme. In this newsletter, you will find various ways in which the scheme has been developed over the past six months, accompanied by industry news.

Research Hub

TO SUPPORT THE
ORGANICS SCHEMES



Certification Body telephone numbers

OF&G

+44 (0)1939 291 800

NSF

+44 (0)1993 885 610

ACL

+44 (0)1984 624 989

Approved Laboratory telephone numbers

NRM

+44 (0)1344 886338

ATL

+44 (0)1449 721 192 (Chemistry) /
+44 (0)1449 721 637 (Microbiology)

Media platforms

LinkedIn

www.linkedin.com/company/biofertiliser-certification-scheme/

Twitter

www.twitter.com/biofertcert

For enquiries

Our 'decision making tree' enables scheme participants to identify a point of call with any scheme related enquiry. The tree can be found on our website [HERE](#).

First Project of the Research Hub – Successful Contractor

Following a tender period that concluded in December '19, REAL are delighted to announce that NNFCC have been appointed as the contractor for the first project of the Research Hub: 'The development of a research library for the Organics Recycling industry'. NNFCC submitted an impressive tender document in response to REAL's invitation for tenders, and following an interview at the REAL's offices in November '19, REAL took the decision to offer NNFCC the contract, which has been accepted. We look forward to working with NNFCC on this project in the coming months!

Research Hub Logo

We are pleased to announce that the Research Hub logo has now been finalised. The logo will be used for all Research Hub official documents and communications. See the final logo above.

The Third and Fourth Meetings of the RH's Research Panel

The third meeting of the RH's Research Panel took place in October in Edinburgh. The Panel discussed selection and evaluation processes for future projects funded by the Hub. The Hub's new Submission Form and Evaluation Matrix were finalised following the meeting in October, ready for the Research Hub's second call for proposals, which ran from 23rd January to 4th March 2020. During this time, all Scheme participants and industry stakeholders were invited to submit a Research Project Proposal to the Hub.

The fourth meeting of the Research Panel took place on the 17th March, where all submitted research proposals were assessed against the Evaluation Matrix. Detailed discussions took place surrounding each project, and after careful consideration, Panel members submitted a score for all Research Project Proposals submitted. The Panel shortlisted three project proposals to progress to the second phase of evaluation. It is our intention to send a survey to all Scheme Operators via SurveyMonkey. Surveys provide an opportunity for Scheme Participants to score and voice their opinions on the shortlisted proposals; the results of a survey are considered advisory and would be taken into account during the second phase of evaluation by the Research Panel. This mechanism provides Operators with the opportunity to influence the decision surrounding the selection of a research project for the Research Hub.

Please note, a decision has been taken that Research Project Proposals can only be submitted to the Hub within designated 'call periods'. We will ensure to provide enough notice for future call periods, so as Operators and the

ADQP review

In December, the Environment Agency announced the Quality Protocol Review Call for Evidence period, which invited industry to comment and provide evidence to inform the decision on whether to continue, or withdraw support, for those QPs. The closing date for this consultation was 31st January 2020.

REAL submitted a response to the Agency with views gathered from operators through the MDWG QP survey. This response was informed by work carried out by our MDWG and based on discussions with UKAS.

The Agency had hoped to publish their initial review outcome in April/May but the unforeseen nature of COVID-19 may push this back further.

The outcome document will announce the Environment Agency's view on whether they support the existing QP's as demonstrating end-of-waste. We also expect the Agency to set out their views on the evidence they have received to date. The expected position is that they do not support the QP's as they stand, but that they are prepared to continue to support them subject to suitable revision. In this scenario, following publication of the response document, there would be a three month period for industry to commit to funding a revision. The EA would set up a review panel and co-ordinate closely with environmental regulators in the UK.

The Environment Agency has been clear that industry would be expected to fund a revision, which is estimated to cost around £20,000 per QP.

Review of PAS 110

The most recent PAS 110 review process was finalised by REAL and BSI in March. Following careful consideration, we decided that now is not the right time to initiate a revision of PAS 110.

wider industry stakeholders alike will have ample time to gather and prepare their ideas for project proposals.

Market Development Working Group

Our MDWG met for the third time in January. The focus of this meeting was the QP reviews. Prior to this, the MDWG had issued a survey to gather views from operators on potential changes to the QPs. The survey asked for views on the addition of new markets, waste inputs, and whether operators had any evidence to support the suggestions put forward. There were a number of survey responses which were analysed by REAL and discussed at the meeting. This work carried out by the MDWG informed REAL's QP call for evidence submission to the Environment Agency.

The MDWG also held a meeting with the Soil Association in September 2019. During this meeting we discussed the use of certified digestate on organic land. The SA had announced that there was a new interpretation of the EU standard regarding food waste from commercial sources. The new interpretation allows the use of digestate where feedstock contains food waste from commercial kitchens, including any processing facility that produces food waste. More information can be found on their website.

BCS Operators Forum and Technical Advisory Committee

The last BCS Operator's Forum took place in October in Leeds.

Agenda items included; updates regarding the Approved Laboratories, the Market Development Working Group, the PAS 110 and ADQP reviews. Operators shared ideas for innovative uses of digestate at the Forum and there was in-depth discussion regarding submission of evidence for the QP reviews and the timeframe for the completion of the ADQP and PAS 110 reviews. Issues surrounding the certification of dried digestate were discussed at the Forum and further escalated to the Technical Advisory Committee (TAC), which took place in November in Edinburgh. At the Forum, there was a request for an extension of the sliding scale of nitrogen content by digestate producers for dried digestate, but it was later clarified that dried digestate cannot be certified to the ADQP for 'product' status under the BCS.

The Environment Agency confirmed to REAL following the TAC meeting that dried digestate / dry separated fibre is not included in the ADQP with an approved and designated market. However, it would be considered for inclusion to the ADQP in the review process, if appropriate evidence is submitted during the call for evidence period.

We began facilitating discussions surrounding a revision of PAS 110 in 2018 at the BCS Operators' Forum, as well as at the TAC meeting. These discussions revolved around the review of the Anaerobic Digestate Quality Protocol; the availability of scientific evidence to support technical changes; a consideration of costs; and the launch of the Research Hub.

In May 2019, we issued a survey to operators that asked, 'Do you think there is a need to initiate a PAS 110 revision process in the near future?'. The survey results were compiled, analysed, and presented to the TAC. The TAC agreed that the results of the survey indicated that BCS Operators were not strongly in favour, presently, of a revision. REAL also sought views from industry bodies.

The outcome of the ADQP review has the potential to inform and influence a PAS 110 review/revision process. A review/revision would be timely post-ADQP review. REAL will aim to seek views from operators and engage with the wider industry in regard to a post-ADQP PAS 110 review process. We will contact BSI in the autumn regarding future plans to review the standard.

Laboratory Approval Scheme

We have established a framework for laboratories approved to undertake testing under the BCS. The Laboratory Approval Scheme (LAS) has been in place since the beginning of this year. The LAS involves the Certification Bodies in the approval process and introduces new requirements for the laboratories; a revised scope of auditing, UKAS accreditation for 'standard' test methods, and participation in a PT programme for non-standard methods.

REAL continues to manage the approval process and the Approved Laboratories continue to participate in the on-going performance assessments and annual

Additional topics that were discussed at the TAC included the ADQP review and implementation timeframes for changes to the BCS Position on Technical Requirements document.

BCS Approved Laboratories Reappointment for 2020

The BCS Approved Laboratories were successfully reappointed for 2020, following their audits against version 3 of the laboratory T&C's in 2019. They have been reappointed against a new version of the T&C's, which can be found on our website [here](#). Laboratories will now be approved under our new Laboratory Approval Scheme and continue to be audited on an annual basis.

For any laboratories interested in applying for approval under the LAS, there are guidance notes and an application form available on our website [here](#). We invite any laboratories that wish to find out more about our application process in order to become approved for PAS 110 testing to contact us.

Appointment of a new Independent Auditor

We are also happy to announce that through an open tender process, we appointed the Open University to carry out independent audits to check BCS Approved Laboratories' conformance with their Terms and Conditions. The audits will be led by Graham Howell who has extensive research and development experience related to several of the PAS 110/100 test methods. Following a careful evaluation period and interview at REAL, the Open University was offered the contract. Graham will bring a fresh approach to the auditing regime with the audits now focussing on scheme-specific tests. We look forward to working with him and the OU team!

Certification Bodies, LAS, and UKAS

Through our Laboratory Approval Scheme, we have invited the Certification Bodies to provide comments on current issues related to the work of the Approved Laboratories and testing digestate. We have so far held three teleconferences this year and the engagement has been positive.

We also held a successful roundtable meeting with all the Certification Officers and auditors in March and will continue to liaise with the Certification Bodies on a monthly basis to discuss any certification and testing issues.



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independent audits to assess their conformance with the T&C's.

The LAS document on our website [here](#) outlines the roles and responsibilities of REAL, the Certification Bodies and the Laboratories in the approval process.

REACH exemption

In October, the EU Commission amended annex V of REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals) to exempt digestate from registration. The listing of digestate in Annex V will remove uncertainties encountered by producers and users of the product. Biogas and compost are already exempt from the obligation to register. The amendment was published on 10th October 2019 and entered into force 20 days afterwards.

2020 Plans

Why Not? Project

We are currently undertaking a marketing project; the 'Why Not? Project', which aims to understand why a portion of UK producers are not currently certified under BCS, promote the benefits of the Biofertiliser Certification Scheme, and encourage more producers to join.

Other initiatives to look out for:

- REAL engagement with DEFRA on the EU Fertiliser Regulations
- Review of the BCS Scheme Rules
- Update to the BCS Sampling Guidance
- PT Programme Tender
- Review of Laboratory T&Cs
- Workshops and Webinars

