



Biofertiliser Certification Scheme Operators' Forum

Minutes from the meeting on 18th May 2022

Hybrid: Online and The Trinity Centre, 24 Cambridge Science Park, Milton Road, Cambridge, CB4 0FN

Attendees

Georgia Phetmanh (GP)	REAL
Emma Laws (EL)	REAL
Megan Muller Girard (MMG)	REAL Research Hub
Jo Chapman (JC)	BCS Operators Representative
Tom Brown (TB)	BCS Operators Representative
Angela Cronje (AC)	Earnside Energy
Darren Smith (DS)	Bioconstruct New Energy
Lucy Owen (LO)	Marches Biogas
Isaac Carswell (IC)	BioTech
Rebecca Taylor (RT)	Iona Management
Mark Barlow (MB)	Swancote Energy
Sally Gardener (SG)	Fylde Fresh and Fabulous
Suzi Sharratt (SS)	DBE energy

Welcome and introductions

GP initiated a roundtable of introductions, before outlining the role of the forum and the programme for the day. GP explained that REAL have found and liaised with a potential new chair, but they informed last week they are no longer available today. They will hopefully be chairing the autumn meeting.

GP asked if anyone had any other issues they would like to raise to be discussed later. No attendees had anything to raise.

Previous meeting minutes

GP asked if attendees had any comments or questions on the minutes from the previous forum meeting in October 2021. No attendees had anything to raise.

Updates on the BCS

Actions from the last meeting

REAL to send new PAS 110 analysis request form to operators with approval for use of own inoculum

GP confirmed that the new form and code system are now in use and were sent to all relevant operators.

AC queried if operators need to request a new code each time.

GP confirmed this is the procedure and that REAL will issue an update to make this clear.

ACTION: AC and JC to contact REAL for new codes to use when sending samples of site inoculum to the laboratories for RBP testing

REAL to seek to obtain the REA DWG ToR and circulate to Forum attendees

Actioned.

TM and TB to discuss ongoing action with Simon Walgate re digestate on OSR

Ongoing, TB will speak with Tom Megginson.

REAL to consider holding another BCS Understanding Test Results webinar and provide draft marketing material to forum attendees for comments before circulating the invitation

EL confirmed that this was actioned before the BCS update containing the information on this webinar was published. Operators' suggestions were taken on board and attendance for the May webinar was significantly higher than the October one.

REAL to record comments on competency re interpretation of PAS test results for next PAS review

Actioned.

REAL to circulate course details for the upcoming REA PAS 110 training course

Actioned – this information was sent via EL's Outlook to increase the chance of the email not diverting to junk.

REAL to ask REA for their plans on future AD HACCP courses

GP has asked the REA for information on upcoming courses and the REA have confirmed they will be holding these this year but have not set a date yet.

REAL to consider joint training course/webinar calendar with the REA for operators

REAL's web developer is in the process of adding an events page to the BCS website and REAL will update this with upcoming courses (including REA's).

REAL to circulate Stephen's presentation to forum attendees with his email address

Actioned.

REAL BCS to check with REAL Research Hub whether research project reports will be published in other publications/journals and when/how the outputs will be shared with the regulators

The publication of project reports in publications/journals is still under consideration, the Hub second project is available for free to BCS/CCS operators and government. MMG asked operators what publications/journals they read and would like this work to be published in.

AC suggested Biocycle.

ACTION: Operators to suggest ideas to REAL for publications/journals the Research Hub could consider for research project reports in addition to Biocycle

REAL to clarify and confirm the courier/certification/sample transit rules to the laboratories again and further discuss informing operators of delays for a decision on whether to proceed

This has been actioned.

GP asked if operators were still experiencing challenges in this area.

AC confirmed there are still issues with couriers not turning up for example, but no longer with the labs. TB agreed that there are now no issues with the labs, and that around Easter, the lab had rang him to ask if he wanted to proceed with testing still when there was a delay due to the bank holidays.

REAL MDWG to consider the increase of crop-derived fibre products on the market/supplied by garden centres and the upcoming peat ban

EL delivered an update on the MDWG who met recently in May. Digestate valorisation was on the agenda. David Tompkins attended and contributed to discussions, as well as giving an overview of recent relevant projects he has been involved in, specifically on the potential use of digestate in horticulture. The group is awaiting the new Resources Framework.

Following the meeting, the MDWG submitted a proposal to the Research Hub, to use REAL's data to assess what potential plastic limits in future PAS revisions could be.

AC asked if this is something that could be considered as a research project, one that could potentially be fast tracked to feed into the QP revision.

MMG responded that the Hub has recently closed its 2022 call for proposals, but the Hub have recently spoken to the EA and if there is an area in need of focus, there is some scope for the Hub to do another project.

REAL/BCS Operator Representative to take issue re unpasteurised slurry and suspended certificate to the upcoming TAC meeting for discussion and advice

This was raised at the TAC, but a conclusive decision was not made. GP added that all details have been recorded for a future PAS 110 review.

REAL to consider joint events calendar with the REA for operators

See previous action on webinar calendar.

REAL to consider holding in-person meetings with virtual/remote access for people to dial in and investigate if it is possible to add the forum events to calendars keeping contact info private

GP confirmed that REAL is trialing the hybrid approach with this meeting – if successful, it will be used in future.

EL explained that it would not be possible to send a Teams invite that would automatically add the forum to people's calendars without sharing everyone's email addresses.

Any questions on the summary paper

GP asked if there were any questions on the scheme developments summary paper that was circulated before the meeting, no questions or comments were raised.

Update on the ADQP revision, EU FPR, and RPS 241

ADQP

The EA has set up Task and Finish groups for all the QPs being revised. The ADQP T&FG is comprised of representatives from Defra, environmental regulators, trade bodies, REAL, CIWM and NFU. The first meeting took place in December 2021.

Once the scope for revising the ADQP is agreed, the EA will produce an estimate of how much they think it will cost to work through the whole process. This will then be provided to industry for agreement. Defra has informed they will contribute funding of £5000 for each QP revision.

Once the costs are agreed, the EA will start to work through all the issues that they agree within the scoping meeting. The T&FG will commission work to enable the revision process to progress. Commissioned work will then be technically assessed by EA technical specialists.

Once all work is complete, the T&FG will produce a technical report on the viability of the new resources framework and the decision will be made by the EA on that viability. The report then goes to be ratified by the EA management chain and then goes through sign off by the EA Content Cloud, which is the process for publishing onto gov.uk.

GP then outlined the key technical issues raised by the EA, REAL, and the trade bodies.

EA:

- Plastic limit – the EA feels this is currently too high
- Digestate comparator – discussion needs to be had on what comparators are more suitable for the end product and there is potential for different comparators for different product types

- Position of manure-based digestates – currently manure-based digestate sits outside of the QP, the EA mean to withdraw this position and therefore bring manure-based digestate under the scope of the QP

REAL:

- ISO 17065 comments – reference within the QP needs updating and all conditions within the revised QP need to be auditable (comments from UKAS)
- PAS 110 revision timescale – PAS 110 is due for review, when should REAL begin this process?
- Test methods – need to be full methods, not SOPs or protocols

Trade Bodies:

- Further processing of digestate
- Additional markets
- Plastic limits

Operators queried if the EA withdrawing their position on manure based digestate was confirmed, as this message had not been effectively disseminated to operators.

GP confirmed this was the intent of the EA, but it is unknown how/what will be put in place instead.

We're unsure if they will be bought under the scope of the scheme.

Operators felt strongly that the EA needed to get the message out about this, as it will cause problems for many AD sites.

JC raised a question on when operators will have to deliver funding they have pledged.

GP answered that we do not yet have the details on this, but pledges were made to the REA, so we understand it will be the REA that collect money.

ACTION: REAL to consider discussing with the EA whether manure-based digestate producers have been notified about the withdrawal of the RPS, what the lead times would be if any for them to transition, and whether they will be brought in to help fund the QP revision

ACTION: REAL to consider inviting Richard Fairweather to the TAC meeting in June

GB FPR

The EA identified in the high-level review that the QP and the PAS could be valid standards in the FPR and there is a need to take into account the fertiliser product regulations in the revision process.

DEFRA is going to be putting forward a proposed modified version of the fertiliser regulations but are currently a long way from getting a firm position out for the consultation.

The EA feel quite strongly that the QP + PAS is still the better option and the standard that's set is implanted in the domestic agreement for the fertiliser regulations.

RPS 241

The EA published a new regulatory position statement in 2021 which they had consulted on earlier in the year.

RPS 241 allows operators to accept wastes with codes that are not in their waste authorisations or the QPs, instead of the not otherwise specified '99' waste codes. It also allows operators to accept wastes with different codes and descriptions to those in the QPs.

The RPS applies until the relevant waste authorisations and QPs are amended or the RPS is withdrawn. A number of wastes have been re-coded. If the original code specified in the QP is on the site permit, certified operators can accept the waste under the new code, but if the original code is not on the site permit, they are unable to accept the waste.

For operators, we have been advised that they will need to change the codes in waste returns. There will be an administrative cost associated and the paperwork will need to be correct but otherwise there are no other changes that need to be implemented.

Implementation under the schemes:

We have drafted a technical guidance document for operators and the CBs with a table displaying the current QP permissible lists of wastes and the new waste codes in the RPS, confirming that operators can only accept wastes under the new codes if the original codes are on their site permits. We are discussing with the EA.

JC queried what the administrative cost was referring to? GP said that she would follow up with clarification as she could not find the email covering this.

ACTION: REAL to check which administrative costs will be associated with RPS 241

Feedback from the last Technical Advisory Committee

JC delivered an overview of key points covered during the TAC meeting in November and the TAC catch up telecon in March.

Firstly, JC reported that CCS certificates are now UKAS accredited and REAL are working/aiming to get accreditation for BCS.

Regarding the sample transit times/labs issue discussed at the previous forum, REAL have produced a clarification note for labs and operators which explains what the requirements are under the scheme. The T&Cs for labs have also been updated, all labs have been reappointed and the main change in the new T&Cs is replacing VETQAS with the AFPS for microbial pathogens.

REAL are also in the process of developing their own PC&S method, to bring the test under REAL ownership, but are waiting to hear from DEFRA regarding the IP of the current method.

In March, the CBs all reported that they had had no complaints, and are expanding in relation to staff, training new auditors and COs.

Finally, JC reported on technical issues discussed at the TAC; mainly that some plastic test results in Scotland had been missed, leading to discussion as to how test results should appear on reports to ensure clarity. REAL are currently working with the labs on how to move forward.

Updates on the Research Hub

Previous Projects Update

Research Library (First Project)

- The Library collates research on composting and AD (www.realresearchlibrary.org.uk)
- It is regularly updated with new articles
- 221 AD-related articles are currently available

Digestate Data Pack & Valorisation Report (Second Project)

- This BCS-specific project completed in December 2021
- The Digestate Data Pack contains collated data and analysis on various digestate characteristics by input feedstock and output type
- The Valorisation Report provides a comprehensive examination of various uses for digestate
- The Reports are available upon request & have been picked up by regulators

To request access to project outputs, please email megan@realschemes.org.uk.

Ongoing Projects Update

Plant Response Test Project (Third Project)

- This CCS-specific project sought to investigate contaminants and phytotoxins in 'End of Waste' composting feedstocks and finished composts to determine the causes of PRT failures
- Following a 6-week tender period, the project did not receive any bids
- REAL is revising the original project proposal and reviewing stakeholder feedback to inform our next steps

Digestate Stability Testing Project (Fourth Project)

- This BCS-specific project seeks to explore improvements and alternatives to the Residual Biogas Potential test
- It is motivated by 2 main factors:
 - To potentially provide evidence and support for the upcoming ADQP revision
 - Operational challenges and low confidence in test results – improvements to stability testing may alleviate such challenges
- A contractor has been appointed and would like to source BCS Operators' involvement for the project

Project Selection Updates

Four Proposal Submissions Received:

1. Development of approach(es) to compare the performance of BCS/CCS approved laboratories for scheme specific test methods
2. Extract and analyse REAL data on physical contaminants in composts and digestates to help inform new limits in future revisions of PAS 100 and PAS 110
3. How the benefits of applying compost and digestate to soils can be accounted for under the Greenhouse Gas (GHG) protocol
4. Mixing & tank capacity assessments

Industry Feedback (Survey & Webinar)

- The Feedback Survey closes on Friday 20th May
- It is accompanied by brief project summaries
- It takes approximately 5-10 minutes to complete
- A Proposal Webinar is taking place tomorrow, 19th May, at 3pm to answer questions

We aim to make a final project selection by August.

MMG then gave operators an opportunity to ask any questions on the updates covered. No questions were raised.

Issues raised with BCS Operators' Representative

JC reported that certification audits are being asked for much earlier now which is positive. Though JC noted that some operators had found themselves chasing the CBs to get their audit in, and that if this continues, operators need to let REAL and the Operators' Representative know.

An opportunity to discuss other issues raised by operators

JC raised that the government had made funding available for sites that are dosing pH of digestate for ammonia. However, as the dosing would take place after the process, this wouldn't fall under the additives position, so it's unclear how this sits with the QP. This has been taken to REAL and the CBs.

Any other issues or topics to raise

EL asked if anyone had ideas of stakeholders to reach out to. All responded they will follow up by email if they have any ideas.

GP asked if anyone would be willing to share the price of their digestate. Operators said that they would potentially email GP this information.

Finally, GP asked for feedback on the hybrid approach, all agreed it had worked well.

ACTION: Operators to suggest ideas to REAL for any additional stakeholders REAL should engage with

ACTION: Operators to send any digestate price information to REAL if happy to share

Actions

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- Operators to suggest ideas to REAL for publications/journals the Research Hub could consider for research project reports in addition to Biocycle
- REAL to consider discussing with the EA whether manure-based digestate producers have been notified about the withdrawal of the RPS, what the lead times would be if any for them to transition, and whether they will be brought in to help fund the QP revision
- REAL to consider inviting Richard Fairweather to the TAC meeting in June
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