

Attending call

David Collins (DC) - BCS (Chair - took notes)
Ciaran Burns (CB) - BCS
Alexander Maddan (AM) - Agrivert
Sandra Esteves (SE) - Wales Centre of Excellence for AD
David Wright (DW) - Staples
Matt Dove (MD) - Lower Ruele
William Dickinson - Veolia
Mark Brown (MB) - Biffa
Emily Nichols (EN) - AfOR
Nina Sweet (NS) - Defra
Kate Lister (KL) - BiogenGreenfinch
Tom Megginson (TM) - GWE
Angela Cronje (AC) - TEG

Both Chris Cooper of Barfoots and Edward Vipond wished to take part but could not due to last minute operational reasons. Their written comments have been included in the consolidated response.

The comments below refer to the questionnaire sent out by REA which is a summary of the main points affecting BCS in the JRC-ITPS Technical Report for EoW Criteria on Biodegradable Waste - 2nd Technical Working Document 11th October 2011

General - NS

- Responding to Questionnaire in JRC 2nd document. Compost and digestate.
- Given to us 5 days before the 2nd and last meeting
- Comments made, but no agreement made
- No time to read it
- Expected a re-draft after the meeting, but did not get one
- JRC commissioned by EU to undertake the work
- JRC to put proposals to EU, based on discussions with member States
- 11th January is deadline for submission to JRC
- JRC will re-draft and send around members - for editorial comment only - target - March
- Then submit to Commission in time for them to put into a Regulation. Plan is for completion by June 2012 - optimistic
- Nina will collate responses and submit as a UK response.
- Now looking for inputs
- NS has already sent data to the commission including on -

Digestate quality
Industry profile
MBT

Organic Pollutant Limits

- Organic Pollutant limit - no OP levels in UK standard. Recommend leave out. 2nd Question - Spot checking by independent sampler
- AM - OP trail a distraction in sewage sludge. Risk very small if from source separated domestic etc. Should exclude OP test.
- KL - we will eliminate OP via our own Risk Matrix and identify those products which may pose risk by means of a site audit to cope with risk. Liquids at low gate fee income would not support a high laboratory cost to test for OPs.
- NS - if we use a Positive list this should reduce risk
- VG - If producing digestate with feedstock from food factory with very high standards - no need for these kind of tests.

NS - Recommend no tests on OPs

Stability Test

- NS - VFAs - response from EA is that we need something to ensure that EoW criteria are met. We have problems in UK with RBP.
- Not confident that the 1,500 limit can be met. Report from WRAP Cymru suggests that VFA test methods not very effective.

15% Dry Matter Limit

- SE - Tables 1 and 2 are closely related. Total solids only work for dry system or separated systems. What happens to liquor? Major issue if liquor at disadvantage
- NS - Total Organic DM is % total DM - not of fresh weight. Related to pollution in compost
- NS - recommend that the value is not appropriate for digestate. Also should be derogated to States
- AM - Need standard that applies to all types of digestion facilities in UK.
- SE - The objective of AD is to convert all of the organics to biogas - this seems to restrict that objective.
- VG - concerned as to how this rule is applied to separated products
- NS - must not stifle innovation

VFA/Organic Acid limit

- NS - Recommend that members states decide on limits on their own not EU 1,500 . This is different from the 15% organic matter.
- DW - Getting 5-600 ml results from agricultural products. Could pass.
- KL - limits not workable in food plant
- TM - why has limit been set at 1,500? Seen German food waste plant pass on 10 months out of 12. DC - question can you get data?
- DC - German Standard reduced recently from 4,000 to 1,500.
- EN - The 4,000 reduced to 1,400 because of odour.

NS - Request derogation of this value to States

Heavy Metals

- Cu and Zn - reduced limits suggested
- NS - Pig industry in Germany wants a lower level than current PAS110. EA would not agree to this in the UK. No definitive data is available to support reduction.
- NS - Question - can we actually achieve these?
- DC - reminder that in PAS110 PTE levels have relationship to soil concentrations
- KL - wants to have the same PTE flexibility as PAS110
- AM - there is an automatic concentration of PTEs during process - therefore need low levels
- SE - 15% dry matter decision critical here
- NS - composters may have difficulty.
- EN - ECN - 600 Zn 300 Cu mg/Kg - 10 year transition arrangement for compost under consideration - worth noting?
- NS Impurities - methods - not go with dry sieving - does not work with digestate. Wet sieving does work.

NS - For low solids digestates the suggested levels are impractical

Update Method for Positive Waste List

- NS - We need a quick method for updating positive list
- Comment - it is already very difficult to get update on UK alone - for whole of Europe would be more cumbersome.
- NS - Need criteria against which the inputs could be judged
- AM - Negative list - does not take into account a new product
- DC -negative list would make marketing very difficult

NS - Quick updating and criteria to judge new wastes required

Categories for input materials

- NS - More feedback needed. Additives - don't think they should be listed in criteria - they are not inputs. However they need testing to prove OK
- KL - a fixed list will stifle innovation - need flexibility

Time/Temperature profiles

- NS - Need an equivalence method - similar to the flexibility available in ABPs.
- AM - UK has most experience in ABPs and should be listened to.
- VG - Non ABP Plant - worried about how this can work. NS - please send email and will discuss separately.
- AM - The selection of 55Deg is not useful and is not a mesophylic temperature.

Parameters that must be declared and Supplied to Customer

- Question - is the division of 2 lists right. (Declared and supplied to customers)
- Comment - Should be simple if digestate used on own land
- NS - could just repeat laboratory results
- VG - Farmers don't want complexity - "Passed PS110" is good enough.
- NS - we do already have ABPR products declared on labelling.
- NS - Plant growth test - weed seed test? Very long test duration.
- AC - Example of compost value sheets - lists all elements and value equivalent - and "passed PAS". Don't need huge detail. Could just use the second page of NrM report?
- AM - Farmers cannot understand metric values - need Kg/Tonne. More details "rings alarm bells" - too much information because no understanding of PTEs etc amongst farmers.

EU wide Quality /Assurance Schemes

NS - this looks like a bid from ECN to centralise accreditation

KL - UK AD industry must be consulted on this - not familiar with EU schemes

NS - We will ask for UKAS accreditation to be accepted and not be forced to adopt an EU wide system

Spot Monitoring

- DC - suggested one random sample a year to give credibility but also a workable RBP test
- NS - Resist the idea of general independent sampling - may be OK for random sampling but not for the routine sampling.
- EN - the “point of sampling” is not well defined in Germany though it is independent.
- KL - Method of sampling is most important. Random sampling would be very difficult if not given notice because of stirring and preparation in storage tanks.
- AC - If random - may not have PAS110 product available at the time. With Animal Health - come every quarter and witness how samples are taken - we should follow that procedure. Above comments noted by DC when reviewing PAS110.

Impact Assessment

- NS - Impact Assessment Data - it is not possible to produce such data for the UK in the timescale.

HACCP

- DC - HACCP missing.
- KL agrees -HACCP useful. Operator should be able to demonstrate by HACCP that final digestate is compliant. Especially when the “point of use” can vary according to storage and closed periods.
- VG - Need a procedure for exception / flexibility when one batch fails
- AC - HACCP is very clear to operators/staff and very useful.

NS - AM to supply HACCP Plan as example.

Weed Seeds in Digestate.

- KL - Viable weed seeds are controlled by normal farming methods.

NS - will object to this stipulation

Visual Inspection of delivery of feedstocks

- DC - PAS110 has a feedstock agreement stipulation
- EN - cannot have a written supply agreements for composters - need exception
- ViG - if using own feedstocks - do not need an agreement
- KL - have risk based system which identifies difficult inputs

- DC - Need to align the current review of PAS110 with JRC proposals - in terms of tests
- NS - we cannot predict the result of the JRC result

Implementation of EoW

- DC - Need a long implementation period

Impurities

- EN - Impurities - 0.5% - interpreting as man-made fragments but not including stones. Want JRC to exclude stones. Please give feedback.
- AM - Digestate will not produce stones except for in dry digestion
- KL - PTEs which are calculated on low dry matter should be taken into account. And with reference to glass and plastics.
- DC - In BCS - no problems seem to have come up regarding impurities limits yet but only seeing CSTR type digesters

DC - EU Laboratory Standards for the Tests - is this practical

- NS - Not confident that many of the tests suggested are accredited. Would be very expensive for labs to accredit

Group Representation

- DC - Would the members like to form a Group to continue the input into the EU? Purposely invited the Chair of the ADBA Digestate Group, Mike Orr to attend. Need support from CLA, NFU, NNFCC, AfOR
- KL - 17th January there is a meeting of AD operators to get consolidated response. Will send report afterwards.
- AM - suggested that we wait until after the meeting to decide on representation.
- NS - Can we attend meeting? KL - Will have to confirm

Waste List

- AC - Eliminated all mention of Sludges from list? Why?
- KL - Silage litter? Not included.
- DW - has the absence of Bioethanol Syrup been noted. DC confirms yes
- NS - Deadline for information feedback to NS is this weekend.