

Impact Assessment Action Plan: This document outlines the proposed approach to completing an impact assessment of the JRC’s IPTS Technical report for the End-of-Waste (EoW) criteria on Biodegradable waste subject to biological treatment (Second Working Document) and any changes to the proposed criteria during the lifetime of the project.

Systems are now established in the UK for the determination of EoW criteria for compost and digestate, thus the approach outlined below provides for an analysis of how the introduction of *cross-EU EoW* criteria could affect the UK’s existing industry and EoW mechanisms. The activity is presented as a series of short work packages (WPs) the outputs from which will be combined, where possible, in a single report for input into the EU process (either via the IPTS or the EU commission). Outputs from different WPs will be developed in collaboration with those stakeholders who are likely to be impacted by any changes to EoW criteria.

To minimise the impact on time and resources, where possible interim and final WP reports will be combined and submitted for review and feedback. Outputs from the individual work package reports will be used by Defra to inform negotiations with the JRC IPTS group and the EU commission.

Work Packages	Outputs and reporting
WP 1 . Project management	
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WP 2. The JRC 2nd working document includes a range of analytical processes to deliver EoW criteria across the EU. This WP will report the impact on UK labs and on the wider stakeholder community of undertaking the analytical methods outlined by the JRC.	
<ul style="list-style-type: none"> • Agree analytical methods to be included in impact analysis. • Source PAS100/110 samples • Undertake tests and review findings • Review impact on UK labs, UKAS, AD industry (include costs for 3rd party sampling). • Review of accreditation standards in use across EU (i.e. is it ISO 17025? Or alternatives). • Input findings from WRAP’s ongoing RBP test (July 2012, (David Tompkins WRAP)¹. 	<ul style="list-style-type: none"> • <i>Whole digestate</i> (VFAs, RBP test, total organic acids, impurities >2mm, Salmonella, plant response, plant response (viable weed seeds & propagules) • <i>Compost</i>: O₂ uptake rate, CO₂ evolved, organic matter; impurities >2mm, Salmonella, plant response, viable weed seeds & propagules. • Output: <i>Interim report</i> on impact of changes in EoW criteria <ul style="list-style-type: none"> ○ Input from stakeholders • Output: <i>Final report</i> on economic impact on labs. • .
WP 3. The JRC discuss the use of horizontal standards under the guidance of CEN task force 151. Given that many methods are some way away from being accredited, the UK has recommended the establishment of a proficiency testing centre to allow individual member states to prove the equivalency and efficacy of different testing methods across the EU.	
• Review the feasibility of establishing a	• Output: interim report on costs and likely

¹ Considering whether alternative methods for demonstrating recovery of input materials are available (and more cost-effective) and whether they have any advantages over the RBP test.

<p>proficiency testing scheme</p> <ul style="list-style-type: none"> • Identify a model for the implementation of such a scheme • Review costs of establishing a Proficiency testing (PT) scheme for the EU. 	<p>time required</p> <ul style="list-style-type: none"> ○ Feedback from stakeholder group for input in final report. • Output: Final report WP3.
<p>WP 4. To assess the impact of changing the established certification schemes or delivering a new certification schemes</p>	
<ul style="list-style-type: none"> • Develop a full understanding of the cost of establishing a new or amended certification scheme. • In doing so, use costings from developing, establishing and marketing PAS100/110 (money, time). • Review cost of establishing other EU certification bodies. • Review the differences between ECN and PAS schemes. • Document time, cost, personnel to convert PAS to ECN. 	<ul style="list-style-type: none"> • Output: Interim report WP4 <ul style="list-style-type: none"> ○ Feedback from stakeholders • Output: Final report WP4
<p>WP 5. Legislative impact (SM) of changes to EoW criteria on public procurement contracts that include requirements for PAS100/ 110 materials.</p>	
<ul style="list-style-type: none"> • Identify appropriate contacts/contracts across WRAP (UK wide). Identify timescales and review periods for potential change. Information to be used to inform need for transition period etc. • Review costs of contract change (incl., e.g. legal costs, impact on procurement owners, industry, markets). 	<ul style="list-style-type: none"> • Output: Interim report WP5 <ul style="list-style-type: none"> ○ Feedback from stakeholders • Output: Final report WP5
<p>WP 6. Training - costs to be incurred delivering training to meet any new EoW criteria.</p>	
<ul style="list-style-type: none"> • Using the experience and costs of delivering training to meet PAS100/110 criteria, develop an impact analysis for any new/revised EoW criteria. • Use information available from, e.g.: WRAP, AfOR, REA, CIWM; • Include forecast costs from EU Skills for delivering EU National Operating Skills for PAS100/110. 	<ul style="list-style-type: none"> • Output: Interim report WP6 <ul style="list-style-type: none"> ○ Feedback from stakeholders • Output: Final report WP6
<p>WP 7. Market impacts - acceptability of EU EoW criteria to existing UK markets and impact (including costs of amending PAS to new EU EoW criteria).</p>	
<ul style="list-style-type: none"> • Using a data from market development to date (quantitative). • Quantitative (if possible) & qualitative impact on the market of the reduction in standards for some criteria (e.g. some PTE limits, lack of mandatory plant growth tests). 	<ul style="list-style-type: none"> • Feedback from stakeholders re likely impact on the market (qualitative, quantitative if possible). • Feedback from stakeholders re impact of reduction in standards for some parameters & whether additional parameters should be included. • Output: Interim report WP7

	<ul style="list-style-type: none"> ○ Feedback from stakeholders • Output: Final report WP7
WP 8. Impact of requiring time, temp and particle size instead of operator defined systems-QMS, HACCP etc)	
<ul style="list-style-type: none"> • WRAP to obtain feedback from AHVLA on the EU suggested approach. • Impact assessment of introducing a time, temp, particle size approach as opposed to the current HACCP, QMS system. 	<ul style="list-style-type: none"> • Input from AHVLA (review with Stakeholders) • Seek direct input from stakeholders re impact of introducing time, temp profiles. • Output: Interim report WP8 <ul style="list-style-type: none"> ○ Feedback from stakeholders • Output: Final report WP8
WP 9. The UK and proposed EU EoW policy on sewage sludge & MBT are the same, this short review will provide a forecast on the size of the MBT output at present and that which is coming on line in the UK	
<ul style="list-style-type: none"> • Short summary of reports on MBT in UK (output, companies, staff numbers, etc) 	<ul style="list-style-type: none"> • Output: Interim report WP9 <ul style="list-style-type: none"> ○ Feedback from stakeholders • Output: Final report WP9
WP 10. The proposed EU EoW criteria include organic pollutants, increases to Cu and Zn limit values, the requirement that limit values for digestates are reported on a dry solids basis, and an enquiry as to the feasibility of implementing a system to update 'Positive lists'	
<ul style="list-style-type: none"> • Analysis of costs and feasibility of including organic pollutants within EoW criteria. • Review the 'Allowance' project. • Develop understanding of the requirements to update positive list following discussions with the EA. • Input findings from WRAP PTE project (May 2012)². 	<ul style="list-style-type: none"> • Output: short summary report on costs and feasibility of including organic pollutants within EoW criteria • Output: summary report on feasibility of positive list updates. <ul style="list-style-type: none"> ○ Feedback from stakeholders • Include input from WRAP PTE limits project. • Output: Final short reports for WP10.
WP 11. Regulatory impact: What would be the cost to the industry of PAS100/110 compost and digestate no longer meeting the cross EU EoW criteria (i.e. reverting to 'waste')?	
<ul style="list-style-type: none"> • Review current amounts of PAS100/110 compost and digestate in UK from available data. • Compost and digestate forecasts for UK (from strategy docs etc). • Develop costs for using PAS100/110 product as 'waste' (current and future) (include EA in discussions). 	<ul style="list-style-type: none"> • Output: Interim report WP11 <ul style="list-style-type: none"> ○ Feedback from stakeholders • Output: Final report WP11

²Considering PTE concentrations in digestate and considering the impact of the proposed EU criteria as noted in the 2nd working document.

WP 12. The requirements on product testing within the JRC IPTS 2nd working document recommend “*probabilistic sampling being chosen as the sampling approach and appropriate statistical methods to used in the evaluation of the testing*”. WP 12 assesses the impact of introducing probabilistic sampling, the methods required and the impact of delivering it across the industry.

- Review the experience and cost of previous attempts to introduce probabilistic sampling for compost.
- Report on the likely impact, including sampling requirements, of introducing probabilistic sampling across UK for EoW criteria for compost and digestate.
- Review the impact of introducing a system of spot checks across PAS100/PAS110 compost and digestate providers.

- **Output:** Interim report WP12
 - Feedback from stakeholders
- **Output:** Final report WP12