

Biofertiliser Certification Scheme Operators' Forum

October 2022 (online)

Attendees

Jane Hall	Chair
Georgia Phetmanh	REAL
Emma Laws	REAL
Megan Muller-Girard	REAL Research Hub
Jo Chapman	BCS Operators' Representative
Tom Brown	BCS Operators' Representative
Rebecca Taylor	Advantage Biogas
Angela Cronje	Earnside Energy
Huw Howells	Welsh Water Organic Energy
Simon Walgate	GWE Biogas

Welcome and Introductions

GP welcomed everyone to the forum then introduced Jane Hall, the new chair of the CCS and BCS Forums. JH gave a brief overview of her work including work at the EA related to Permitting, CIWM, and delivering training. GP then initiated a roundtable of introductions and ran through the programme for the day and outlined the role of the forum.

Previous meeting minutes

All accepted the minutes for the previous meeting.

Updates on the BCS

Actions from the Previous Meeting

AC and JC to contact REAL for new codes to use when sending samples of site inoculum to the laboratories for Residual Biogas Potential (RBP) testing

Actioned.

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

REAL Research Hub received no additional suggestions.

REAL to consider inviting Richard Fairweather to the Technical Advisory Committee (TAC) meeting in June

Actioned; Richard attended the June meeting to deliver a QP update. A further update will be given on the QP later in the meeting.

AC raised that she had noted investors suggesting that manure based digestate sites should be aiming for PAS 110. JC agreed, adding that a few sites are going through farmers cooperatives to source pasteurisers and taking the steps to prepare for PAS 110.

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

GP informed that the EA had factored in costs for operators of updating their paperwork, rather than there being any charges associated with RPS 241.

JH asked if GP could outline what RPS 241 covered.

GP explained the RPS allows operators to accept waste with EWC codes that are not in their permits or QPs instead of the '99' codes. There are now different, and additional, EWC codes in use, which sites can accept if EWC codes ending '99' are on their permit. See EA [RPS 241](#) for full details.

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

REAL received no additional suggestions but are continuing to work on expanding list of stakeholders as an ongoing project.

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

REAL received no responses, however, have proposed collecting this information in the Scheme Rules which were sent out for consultation in mid-August.

JC commented that she had contacted the director of Shropshire Biogas to ask if she could share this info but received no response.

AC raised that the certification bodies (CBs) may have this information as it is sometimes requested during audits, however, AC was unsure if this was recorded anywhere, or the auditor was just curious.

JC noted that the price for digestate may not be straightforward; it can be negotiated and depends on reciprocal agreements, e.g., spreading costs considered in spreading agreement. So, it may be difficult for REAL to use this information regardless as you will be unlikely be comparing like for like.

SW agreed, adding that haulage also makes a big difference. SW noted that the prices could be gained by asking farmers, as while sensitive it would not be difficult for REAL to find.

AC commented that a breakdown would be beneficial, as the scheme could then use this information for promoting certified digestate.

JC agreed but emphasised that the factors in getting digestate to ground are very different when compared to compost, for example discounts will be given if people have a lagoon in which they can store some digestate.

AC noted that an estimate of the value of the material itself could be given which excludes the practicalities.

ACTION: REAL to consider feedback from operators when deciding how and what information to collect on the price or value of certified digestate (e.g., price varies seasonally, different to compost, etc.)

Any questions on the summary paper?

There were no questions.

Update on the ADQP revision

GP delivered the following update on progress of the Anaerobic Digestate Quality Protocol (ADQP) revision. The first meeting of the Task and Finish Group to discuss the revision of the ADQP (and Compost Quality Protocol) took place on 5th September. The scope of the revision and evidence available to date were considered by the group, with the focus on risk assessment. Further meetings will be arranged in due course to discuss matters in greater detail.

REAL are collaborating with the EA and will be publishing a paper on plastic contamination, as evidence for the revision, which will be made available on the BCS website.

Feedback from the last TAC Meeting

JC gave feedback on the key areas of discussion at the last TAC. Firstly, JC reported that DEFRA attended and gave an update on the Fertilising Product Regulations (FPR) (see TAC minutes [here](#)), and that it was good to see DEFRA attending and working with the EA and REAL with regards to the QPs, PAS 110, and the fertiliser regulations. DEFRA still seem to be unsure on the content of the FPR and may be awaiting the QP outcome.

There was a discussion on plastics and if the Hub plastics project could be fast tracked if selected for funding. A further update on this will be given during the Hub update.

JC then gave an overview of the issue around reporting of plastics/physical contaminants in Scotland, where Scottish operators have an additional plastic limit which is not in PAS 110. A note has been added to lab reports to make it clearer that passing the PAS 110 limits in Scotland does not necessarily mean End of Waste has been achieved according to SEPA's position statement. REAL are currently working on the reporting template to enable labs to report a pass/fail against the SEPA limits.

There was a lot of discussion on contamination, with Gregor Keenan (CCS Producers' Representative) sharing footage of an incoming load with 2% (w/w) contamination by weight at his site. Visually this looked like a lot of plastic, and acceptable contamination in incoming loads needs to be discussed with local authorities (LAs) as it is within the LA contracts. Addressing this issue would be beneficial for AD sites as well as compost sites.

JC commented that the technical issues discussed were CCS related but could be read in the TAC minutes.

AC raised on this that she had not received an invitation to the last CCS forum.

EL responded that there had been an issue with people being unsubscribed from mailing lists before and that she will investigate this.

ACTION: REAL to check if AC is on mailing list for CCS update emails/investigate why emails weren't sent to AC

JH asked if there were any questions on the TAC update.

AC expressed surprise at the labs reporting a pass/failure, as she considers this is something that the operator should be assessing.

GP responded that this had been REAL's view originally. However, on further discussion with CBs and regulators it was pointed out that with the lab reporting against the labs, this reduces the likelihood of error and so it was a preference expressed by CBs and regulators that the labs report on compliance. SEPA fed back that operators' missing a failure would have a knock-on effect for e.g., farmers being penalised for taking material they thought was complaint but in fact was waste. REAL took this on board, discussed this with the labs and are now in the process of producing SEPA reporting templates for the lab to use, which should be ready by the end of 2022.

JC asked if the request forms would also have to change.

GP confirmed there would also be a new analysis request form for EoW Scotland.

Research Hub Updates

Completed projects

MMG reported that the Research Library has had 107 articles added since its launch in Jan 2021, there are now 237 AD-related articles collated by the library across 7 topics: associated emissions, biogas utilisation and upgrading, design and control, digestate valorisation, feedstock and pre-treatment, novel business and operating models, and process optimisation. MMG reminded the forum that access can be requested by email.

MMG also reminded the group that the digestate data pack and valorisation report project was completed in December 2021, and the outputs can be requested by email (megan@realschemes.org.uk).

Current projects

A project on Evaluating Potential Improvements & Alternatives to the RBP Test is currently underway. Aqua Enviro was appointed as the contractor and commenced work in April 2022. The work is projected to be completed in April 2023.

Future Projects

In Summer 2022, the Hub decided to fund three new research projects:

1. Plant Response Test Interpretation and Comparison: Investigating performance of the PAS-Specified Tomato Plant Response Test and Spring Barley Test on Quality Compost (CCS-specific)
2. Evaluate possible alternative area-based methods of assessment for plastics (CCS and BCS)

3. How the benefits of applying compost and digestate to soils can be accounted for under the Greenhouse Gas (GHG) Protocol (CCS and BCS)

Tender period to commence in Autumn 2022. Projects expected to commence in early 2023.

Future Projects

The Call for Proposals opens in January and runs for approx. 6 weeks. Support is available for developing research ideas from Stephen Nortcliff, Advisor to REAL Research Hub, (s.nortcliff@reading.ac.uk). The Hub is also considering a workshop to brainstorm and develop ideas if operators would find this helpful.

REAL considered running a webinar to present proposals and answer any questions prior to the survey; this was held for the last selection period, and while attendance was low, feedback was positive.

A survey is then held for CCS and BCS Participants to express their preference. The survey is accompanied by brief project summaries and only takes 5-10 minutes to complete.

More info can be found in the Hub's 'How it Works' paper ([here](#)).

MMG then asked if there were any questions.

AC asked how far and wide projects are being circulated, for example the PRT project sounds like it would be a good project for a student, as universities have the facilities.

MMG responded that universities are contacted but the Hub is very open to suggestions.

ACTION: REAL Research Hub to consider contacting universities (e.g., University of Central Lancaster or Preston polytechnic) regarding research project tenders in case they can be undertaken by MSc students

ACTION: REAL Research Hub to consider asking Stephen Nortcliff for university contacts re the action above

Issues raised with the BCS Operators' Representative

JC reported that one operator had raised the additional cost of testing with their own inoculum. The operator commented that there is a handling fee for use of their own inoculum, they acknowledged the lab would have to do additional processing but felt this was putting them at a disadvantage and questioned the suitability of the test.

GP responded regarding the suitability of the RBP test which is being investigated by the ongoing Research Hub project and will be discussed once the outputs of the project are available.

Additionally, GP explained that the current system is not a permanent one, it is an interim solution and was the most appropriate option given the current requirements of the method.

GP then outlined the number of operators experiencing inoculum inhibition: 16 processes since 2020 have/are going through REAL's procedure for inoculum inhibition, of these only 5 have been approved for use of their own inoculum only. REAL's approach is that operators should only use their own inoculum where there is a clear inoculum issue. REAL have advised one operator to return to the lab's inoculum. REAL have also discussed the surcharge with NRM who informed that their prices are not

fixed, they differ per customer, and can work with operators to reduce their prices for example if they have multiple sites going through the system.

TB asked if all the labs are using a standard shared inoculum.

GP responded that the inoculum used in different labs is from the same source, in line with the method, but not the same supplier. The RBP Hub project includes comparison of inocula.

AC shared that the lab had at one point accidentally ran their RBP test in parallel rather than own inoculum only, and the lab inoculum worked that time.

An opportunity to discuss other issues raised by operators

Regarding REAL's RBP inoculum procedure, AC raised that it can become a bit logistically difficult for operators with multiple processes. Could these operators be issued a single code?

GP responded that REAL will investigate this.

ACTION: REAL to consider issuing operators with multiple sites using their own site inoculum for the RBP test with different approval code formats to ease the administrative burden.

AC also had a query on volatile fatty acids (VFAs) and their relation to the RBP test. Operators use the VFA as an indicator for the RBP test however AC has noticed cases where the two don't appear to relate. The VFA had been very low in one case, yet the RBP test was only just passed.

JC noted she had experienced something similar: the VFA result was low, however the RBP test failed. On further investigation it was found there was an error made by the lab.

AC asked if the VFA test could be used as an indicator that a quality control check is needed at the lab, if there is a large discrepancy between results.

JC added that some more information on VFAs will be included in the RBP Hub Project.

ACTION: REAL to discuss whether the laboratories should check from a quality control point of view if there has been an issue resulting in the VFA and RBP results showing a significant discrepancy

ACTION: REAL and operators to await findings from the current Hub project on the RBP test/inhibition issues

ACTION: REAL Research Hub to consider discussing the VFA discrepancy issue with the RBP project contractors

GP asked operators if they were having any issues with scheduling audits as one operator had reported that they had been struggling to get their CB to find time for an audit after the last forum. REAL spoke with the directors of the CB in question to address this; the main issue was resource/staffing availability, which has since been resolved.

All attendees reported no recent issues scheduling audits.

AC noted that OF&G are very good at scheduling audits early.

RT had experienced issues scheduling audits with NSF but had since moved to OF&G. RT agreed OF&G were very good for booking in audits.

GP commented that issues with NSF had been reported in the past and so REAL had held a series of meetings. NSF have since expanded their staffing and no complaints had been received since. GP asked if any of the attendees' issues with NSF had been since this meeting in February?

All attendees noted these issues were not recent.

ACTION: REAL to consider raising the administrative issues related to previous certificates not being issued in time and operators not knowing who is best to contact with NSF

Any other issues or topics to raise.

EL asked attendees if they had any ideas of webinar topics or guidance topics that would be useful for either existing operators or applicants.

JC asked if there was any HACCP training upcoming.

EL responded that the REA HACCP course will be held on the 17th of November.

AC commented that the Hub webinars covering projects were useful, and that she had no other suggestions.

JH asked if permitting webinars would be useful but noted this was likely beyond the scope of the scheme.

JH added that, while not for operators, it may be worth considering holding seminars/webinars for universities, where BCS operators could share their real-world experiences. This would help build relationship with universities which may provide academic resources for future Hub projects.

JC queried if BCS could do this in collaboration with CIWM.

JH responded this would be possible.

ACTION: REAL to add REA HACCP training course to the events page on the BCS website

ACTION: REAL and operators to consider offering universities something in return to involve them in Hub research projects, e.g., webinars on EoW, potentially in association with CIWM

ACTION: REAL Research Hub to consider developing webinars on Hub project tenders for universities to attract tender responses and further knowledge transfer

ACTION: JH to email Simone at CIWM to ask if action above would fit in their agenda on EoW

AC raised that she was having trouble getting a response from animal health.

TB agreed this is an issue.

It was suggested operators should speak to their trade bodies on this.

JH asked all attendees to vote for how meetings should be held in future. The vast majority voted for online, and JH commented that ad hoc in person meeting could be held if needed.

ACTION: REAL to hold all BCS forum meetings online going forward with any 'meatier' meetings in person

EL asked attendees if they had ideas for blog posts or would be happy to be involved.

There were no responses.

ACTION: Operators to contact EL if they would be happy to contribute to future blog posts or articles

Actions

- REAL to consider feedback from operators when deciding how and what information to collect on the price or value of certified digestate (e.g., price varies seasonally, different to compost, etc.)
- REAL to check if AC is on mailing list for CCS update emails/investigate why emails weren't sent to AC.
- REAL Research Hub to consider contacting universities (e.g., University of Central Lancaster or Preston polytechnic) regarding research project tenders in case they can be undertaken by MSc students.
- REAL Research Hub to consider asking Stephen Nortcliff for university contacts re the action above.
- REAL and operators to await findings from the current Hub project on the RBP test/inhibition issues.
- REAL to consider issuing operators with multiple sites using their own site inoculum for the RBP test with different approval code formats to ease the administrative burden.
- REAL to discuss whether the laboratories should check from a quality control point of view if there has been an issue resulting in the VFA and RBP results showing a significant discrepancy.
- REAL Research Hub to consider discussing the VFA discrepancy issue with the RBP project contractors.
- REAL to consider raising the administrative issues related to previous certificates not being issued in time and operators not knowing who is best to contact with NSF.
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- REAL Research Hub to consider developing webinars on Hub project tenders for universities to attract tender responses and further knowledge transfer.
- JH to email Simone at CIWM to ask if action above would fit in their agenda on EoW.
- REAL to hold all BCS forum meetings online going forward with any 'meatier' meetings in person.
- Operators to contact EL if they would be happy to contribute to future blog posts or articles.