



BCS Operators Forum Meeting Minutes

Wednesday 7 October

Online

Attendees:

Georgia Phetmanh	REAL
Molly Rogers	REAL
Gaynor Hartnell	Chair
Olivia FursseDonn	REAL
Jo Chapman	BCS Operators Representative
Tom Brown	Andigestion
Angela Cronje	Earnside Energy Ltd

1) Welcome and introductions

GH welcomed everyone to the meeting and noted the low operator attendance. It was suggested that this was due to the clash of the forum with the ADBA trade event.

2) Updates on the BCS

Actions from the last meeting

- *MDWG to consider inviting someone from the water industry to present on marketing sewage sludge, to identify if lessons could be learned for improving the market for digestate.*

The MDWG intends to do this for one of the meetings and the plan is for the next meeting to take place in early December. Though this meeting may focus on the QP reviews.

- *REAL to clarify use of the term 'particles' in the BCS position with auditors.*

Following the last Forum, the CB's were contacted to request that they clarify and confirm to the auditors that the use of the term 'particles' within this position relates to Physical Contaminants (PC) and not non-PC particles. This has been confirmed with the CB's.

- *Kate to send Jo details on inhibition testing*

Information on potential causes of inoculum inhibition was shared with Jo. Jo's plant had been experiencing issues with obtaining a valid RBP result due to inhibition of the laboratory standard inoculum. This issue was taken to the TAC for further discussion.

- *REAL to consider whether to hold some BCS Operators' Forum meetings online*

From 2021, one out of the two forum meetings will be held online.

Scheme Status

MR reported that as of October 2020, there were 91 plants on the BCS (65 in England, 12 in Scotland, 9 in Wales and 5 in Northern Ireland) accounting for approximately 4.9 million tonnes per annum of throughput. 60 plants were producing whole digestate, 34 separated liquor and 22 separated fibre. Since the beginning of 2020, there have been 12 applicants to the BCS (8 of which are now certified), 0 certificates have been suspended and two certificates have been withdrawn.

Action: REAL to consider how to present growth/decline in numbers on the scheme.

BCS Certification Body Tender

In July, REAL opened a tender process to appoint a number of certifying bodies to run the BCS on its behalf. The selected Certification Bodies will provide certification services on behalf of REAL. The Tender Invitation Document can be found on the BCS website. REAL had received four tender submissions and at the time of the meeting, were currently reviewing all of them. The successful CB's will be appointed in October 2020 and their contracts will commence from January 2021.

AC noted that the audit season is demanding, the CB's appear to be overstretched and it would help to have more appointed. GP clarified that the CB's informed they are not at capacity yet, but the scheme is growing, and REAL will evaluate the CB's performance on a regular basis to identify any areas for improvement.

JC suggested that feedback from operators on the performance of CB's should provide useful information for REAL, which could be taken into account during the tender process.

Action: REAL to consider obtaining operator feedback to feed into CB tender evaluation process

BCS Scheme Rules

Version 5 of the BCS Scheme Rules were reviewed and draft Version 6 was issued for consultation on 14th August 2020. The key change can be found in section 4.2, specifically in relation to the 'Quality Assurance' category of certification. There are also some terminology changes (e.g. use of the term 'participants' in place of 'members' and 'TAC' rather than 'Oversight Panel'). Draft version 6 was issued for consultation to all scheme participants, TAC members, CB personnel, and laboratory personnel. The deadline for consultation responses was 25th September 2020. We are currently collating and reviewing all the responses and will provide a written response to the consultation which will be made publicly available. Version 6 will be effective from January 2021.

Annual Report

REAL published their third annual report for the BCS, providing an overview of the scheme and summary of scheme developments in 2019. In summary, there were 84 plants certified under the BCS

REAL BCS Operators' Forum, Summary notes from the meeting on 7th October 2020

by the end of 2019, with a total registered annual throughput of approximately 4.5 million tonnes. Of the 84 certified plants, 62 were in England, 11 in Scotland, eight in Wales and three in Northern Ireland. The report also presents an overview of the Compost Certification Scheme and includes the Research Hub 2019 Annual Report. The report has a new design and can be viewed on the BCS website.

Annual Report 2019: Certified Sites 2020

- *REAL to aim to include information on the percentage of certified plants in annual reports*

It had been suggested that knowing the proportion of certified sites in membership would be a useful indicator of market penetration.

REAL contacted all regulators in 2020 to obtain information on the percentage of certified sites in the UK. In May 2020, 40% of sites with waste permits and 9% of sites with waste licences in NI were certified. In Wales, 64% of all bespoke sites were certified. In July 2020, 63% of sites in Scotland with PPC permits were certified. In England, 26% of all sites with biowaste treatment sector permits covering AD/biogas as an activity were certified. This table was presented in the report.

REAL are currently undertaking a marketing project, titled “Why Not?” which aims to find out the reasons why some sites which could be certified, are not. TB noted that it would be possible to guess from a site permit type why they may not have pursued certification and that the information above would be worth breaking down further.

AC commented that in Northern Ireland, there are sites that have everything in place and would apply for certification but cannot pass the RBP test as they have negative gas production. These sites would otherwise be likely to join the Scheme.

Action: REAL to consider further analysis of datasets obtained from the environmental regulators

Scheme Participant Survey

REAL ran a satisfaction survey from 16th – 30th September, to help prioritise areas for further development. It was devised to contribute to compliance with the requirements of ISO 9001:2015, which REAL has been assessed and certified to.

PT Programme Expressions of Interest Document

We recently circulated an Expressions of Interest (EOI) document, which has been designed to help REAL assess the technical feasibility and financial viability of developing an independently run proficiency testing (PT) programme for the scheme specific test methods. If one or more responses to this request for EOI suggest that an independently run programme is both technically feasible and financially viable, REAL will proceed to an open tender process.

The deadline for responses was 14th October 2020.

The document was added to the BCS website, circulated by REA Organics on REAL’s behalf, and was also sent directly to a few organisations of REAL’s knowledge that might be interested.

Twitter for Scheme Participants

We have recently created a private Twitter account to share scheme news with certified Operators. This Twitter page will be aligned with the 'news' section on our website and updates, newsletters and important changes to the Scheme will be shared via tweets. Operators are able to be alerted when we tweet through a Twitter notification on the app. Request to follow us at: @BCSOoperators.

Operators noted that this was a good idea considering previous issues whereby some Operators were not receiving emails sent by REAL.

Audits during Covid-19

In consultation with the Environmental Regulators and the Certification Bodies and in light of the situation regarding COVID-19, REAL agreed that from August 2020, the Certification Bodies will schedule on-site audits, where possible, and remote audits will continue to take place where necessary e.g. if the auditor or site are assessed as at high risk. This position was reviewed in September during a meeting between REAL and the Regulators, following consultation with the Certification Bodies. REAL wrote to each of the environmental regulators to request an extension to the agreement, following the Government announcement on 22nd September. SEPA and NIEA had provided their formal position extending the agreement to 31st January 2021.

Upcoming developments

- Release of the BCS sampling guidance document for liquid materials, which has been updated from 2015. There have been a few minor changes to the document and REAL are going through a consultation period. There have been a few comments from the laboratories which are being addressed.
- Tender results – announcement of successful BCS CBs
- Issuing of revised BCS Scheme Rules
- Publication of updated cost comparison document
- Publication of RBP Position Statement (covered later in the meeting)

Action from last meeting: REAL to further discuss the provision of interim reports for RBP with the laboratories

Action from last meeting: REAL to discuss with the laboratories notifying operators when subcontracting tests

Action from last meeting: REAL to discuss with the laboratories notifying operators if the sample looks like it will fail when the test is subcontracted

These actions are valued by operators, and laboratories that provide them are regarded as providing good customer service. Regarding subcontracting and informing operators on whether a test will be subcontracted, NRM explored whether they could notify operators in advance. It was agreed that it is not possible to inform operators of sample receipt if the sample will be subcontracted. Interim reports can be requested but there are no requirements to do this in the T&C's.

ATL provide interim reports for all tests but RBP and PRT for compost, but they will inform operator if there is subcontracting. This is important to the operators. NRM have informed JC that they are planning to expand and will no longer need to subcontract.

Action: REAL to update the BCS position on technical requirements to a clean version

Action: REAL to provide a recommendation to the labs that they provide interim reports.

3) Updates on the Research Hub and First Research Project

OF reported that the first Research Project commenced in June and is scheduled for completion in January of '21. There have been fortnightly meetings between REAL and NNFC, to provide an update on project development and to monitor project progress, as well as monthly team meetings between NNFC/Vital/REAL. The fifth of eight project milestones is near completion; NNFC will provide a report to REAL summarising the findings of the Gap Analysis during November '20. A static version of the digital library has been showcased to REAL; data gathered during the Literature Review is currently being transferred into the platform.

The second project selected for commissioning is titled *“To develop a ‘data pack’ on the properties, characteristics, and content of digestate that will provide the context for the development of new uses of outputs from Anaerobic Digesters’*. A Project Management Team (PMT) was established to include individuals from Zero Waste Scotland, REA, and REAL. The PMT have drafted a Project Brief and a Tender Invitation Document, which are now in the public domain. The tender process has been initiated and the deadline for tender submissions was Friday 02 October. The first Tender Evaluation Meeting will take place next week, and the tender process is due to conclude, and a contractor for the second project be appointed by November '20.

The Research Hub website was launched in August and its traffic is currently being monitored. The first Annual Report of the Hub, summarising the Hub's activity in 2019, has been finalised and was circulated to operators and industry at the beginning of September. A decision has been taken not to hold a Panel meeting in October 2020, since there are no immediate decisions to take. The Research Project Selection Process has been revised – the new process will be implemented from 2021.

NNFC Update

Lucy Hopwood reported that NNFC started this project by conducting a literature review through different platforms, to identify research in the last 10 years relevant to the compost and AD sectors. There was also a consideration of research out of the 10-year period and outside of the UK.

NNFC viewed several hundred articles, journals and industry reports and catalogued over 200 key articles, according to the type of publication and research. The abstract and summary of research has been recorded and entered into a database. Once this was completed, there was an identification of key topics which allowed NNFC to come up with research themes for AD and composting. There is a thematic summary, which is up to a page of A4 summarising the research theme e.g.: AD system design and control. For AD, the key topic areas are feedstock and pre-treatment, process design and control, process optimization, biogas utilisation and upgrading, digestate valorisation, associated emissions, and novel business models.

The next step is an industry needs assessment (INA) survey. The structure and focus have been informed by the key themes identified in the literature review. NNFCC have been liaising with BCS and CCS producers on this INA. A gap analysis will be carried out to identify gaps in the key research areas, taking into consideration the findings of the literature review and INA. The gaps will be ranked in discussions with key stakeholders and results will be presented in the digital platform.

AC questioned if papers can be recommended before they are uploaded to the website and if there will be a 'submit research' option or form on the website. LH clarified that NNFCC will discuss with developers regarding a submit research button on the platform.

4) Update on the ADQP review

At the last TAC meeting, Richard Fairweather from the Environment Agency was invited to provide an update on the QP reviews. The outcome document will explain why the Environment Agency does not support the ADQP as it stands. The QP will, from that date, be covered by a Regulatory Position Statement (RPS), which will allow time for operators to gain the necessary permits, or for the revision process to take place. From the date of publication, industry will have 6 months to commit to funding and the revision process is anticipated to take approximately 6 months. If funding does not appear, the RPS will be withdrawn and waste controls will apply (in England and possibly elsewhere). If a revision takes longer than 6 months, the RPS could be extended.

REAL understands the outcome document is progressing through an internal approval processes, and hopefully will be published in October.

- *Action from last meeting: Gaynor to send an email to REA executives and individual BCS Forum attendees to discuss how to approach the EA regarding the status of dried digestate and the ADQP*

GH carried out this action and cc'd JC. This initiated various exchanges. It was noted that the REA/REAL QP review event will be an important opportunity to raise the topic of dried digestate, and it was noted that all CCS and BCS Operators are likely to be invited to attend free of charge.

Action: REAL to consider liaising with SEPA regarding the ADQP review

Action: REAL to share feedback from operators' forum on QP review event with REA.

- *Action from last meeting: Georgia to contact Iain for further information about evaporate from dried digestate*

GP had a discussion with the CBs during a conference call. They asked if evaporate would need an EWC code and if it was classified as digestate. GP had contacted Iain but did not hear back from him for an answer. Forum attendees informed GP that Iain is no longer with Duranta / representing an Operator. JC would provide GP with his new contact details.

- *Action from last meeting: REAL to circulate link to the EA's report on the initial review of the ADQP when published*

REAL BCS Operators' Forum, Summary notes from the meeting on 7th October 2020

This action will be completed when the review document is published.

JC questioned if the RPS will have additional requirements. GP clarified that following the TAC meeting, minutes were sent to Richard to confirm the details. REA and REAL also emailed the EA to request clarification and raised concerns about this possibility. Richard Fairweather confirmed that there would be no additional requirements in the RPS.

AC questioned if Scottish Operators would be required to pay for the review in England if SEPA's position statement stays the same. Jenny Grant might have a better feel for SEPA's position and their view on this, as there needs to be a consideration on how the QP review might affect Scottish Operators.

Action: REAL to consider contacting regulators (NIEA and NRW) to ask for any updated QP positions

5) Feedback from the last Technical Advisory Committee meeting

JC reported that discussions around dried digestate took place at the TAC.

There was an extensive discussion surrounding RBP testing on the back of two issues from the last forum:

- 1) An Operator who had complications surrounding a test failure on two replicates instead of three. This Operator had flagged several concerns surrounding the reliability of laboratories, with questions on who bears the responsibility of a mechanical failure at the labs, and the wording in PAS which states that results will be assessed in triplicate.

When this issue was raised by the Operator, there were discussions with the CB's and Laboratories surrounding the line in PAS 110 which specifies that results must be assessed in triplicate. Discussions have been ongoing and following the previous Forum, there was a draft position statement circulated to UKAS to check that they were happy with this approach. The position statement outlines that results can be valid based on duplicate measurements. The laboratories, the CB's, and UKAS were happy with the position and it was circulated to the TAC with a deadline for comments of 07/10/2020.

The issue of auditing and inter-reliability between two laboratories was also raised. A Proficiency Testing Programme has been discussed and there are developments in terms of moving that forward. There are measures in place to test for reliability which are underway. The Operator's concerns were discussed and addressed at the last TAC meeting.

- 2) Shropshire Biogas had an issue with inhibition in the first few days of the RBP test and the result failed because it did not meet the quality requirements in the test. Modifications to the method of the test were discussed. There is now an internal pathway that Operators can be guided through in terms of different methods that they can try. The laboratories have assisted with the process by doing extra tests, printouts, and video calls to discuss this. There has been a document explaining the technical aspects of the RBP test, which will be circulated to operators. The document also provides contact details of laboratory personnel.

Operators encouraged this sequence of actions to become protocol if there is no valid RBP result, as there needs to be assistance when Operators struggle with this test. However, this is not a solution

for everyone. AC reported that there is a Northern Ireland plant where they are using their own digestate as an inoculum and there is still negative gas production.

Action: REAL to consider guidance for operators if samples are unsuitable for the RBP test

Action: REAL to consider changes to request form and reporting template when own inoculum is used

- *Action from last meeting: REAL to raise issue regarding RBP test results reported in duplicate at the TAC meeting*

See above regarding position statement.

6) Issues raised with BCS Operators' Representative

JC reported that with Nicola Frost's departure from Andigestion, there is now a vacancy for another operator to share the role of Operators' Representative with her.

7) An opportunity to discuss other issues raised by operators

AC flagged that a section within the BCS Position on Technical Requirements needs to be reviewed in relation to the required declaration note, as this is not required in Scotland. SEPA does not have the same documents to reference.

Action: REAL to review section in BCS Position document re declaration note for Scottish sites

End.

Actions:

- REAL to consider how to present growth/decline in numbers on the scheme
- REAL to consider obtaining operator feedback to feed into CB tender evaluation process
- REAL to consider further analysis of datasets obtained from the environmental regulators
- REAL to update the BCS position on technical requirements to a clean version
- REAL to provide a recommendation to the labs that they provide interim reports
- REAL to consider liaising with SEPA regarding the ADQP review
- REAL to share feedback from operator's forum on QP review event with the REA
- REAL to consider contacting regulators (NIEA and NRW) to ask for any updated QP positions
- REAL to consider guidance for operators if samples are unsuitable for the RBP test
- REAL to consider changes to request form and reporting template when own inoculum is used
- REAL to review section in BCS Position document re declaration note for Scottish sites