

Biofertiliser Certification Scheme Operators' Forum

Minutes for the meeting on 28th October 2021

Online

Attendees:

Isaac Carswell (IC)	BioTech4
Tom Brown (TB)	BCS Operators' Representative
Jo Chapman (JC)	BCS Operators' Representative
Thomas Aspray (TA)	Solidsense
Stephen Nortcliff (SN)	Research Hub Advisor
Rebecca Taylor (RT)	Advantage Biogas
Tom Megginson (TM)	GWE Biogas
Emma Laws (EL)	REAL
Georgia Phetmanh (GP)	REAL
Gaynor Hartnell (GH)	Chair
Angela Cronjé	Earnside Energy

1. Welcome and Introductions

GH welcomed everyone and initiated a roundtable introduction, announcing this would be her last forum as chair, suggesting that if anyone has a recommendation as to who could chair in future, they should send this to GP. GP then gave a brief introduction to REAL and outlined the aim of the forum.

2. Previous meeting's minutes

All were happy with the minutes from the previous meeting in May.

3. Updates on the BCS

Actions from the Last meeting

GP provided updates on actions from the previous meeting.

REAL to consider sending marked-up version (showing latest changes), along with clean version when updated BCS Position document is disseminated

REAL have discussed this and agree it would be valuable. The next version of the BCS Position document has not yet been disseminated as comments from TAC members on the document are being reviewed following a consultation period, but when it is disseminated, both a clean version and marked-up version showing changes from the previous will be available.

REAL to consider adding note in cost comparison document to inform that the gate fees have not been included in the calculations

A note has been added into the supplementary section of this document explaining that gate fees and other associated costs such as haulage fuel and soil sampling are not included in the comparison. The document has also been renamed Fee Comparison to reflect that it is only considering required fees/charges and not wider costs. It is available on the BCS website.

JC to review draft text for cost comparison document

The draft was sent to JC and suggestions provided were incorporated into the updated document.

REAL to instruct laboratories to alert operators if RBP test is not valid and the implications with respect to their certification (ideally by phone call)

REAL discussed this at the summer meeting with the labs, suggesting that operators are alerted before the end of the test. One of the two labs had already been doing this, but it is not required in the lab T&Cs. It will be consulted on during the annual T&C's review. Otherwise, a note was produced for labs when reporting an invalid result at the end of the test to ensure that the messaging operators receive is clear and consistent. It was agreed this was the most appropriate and careful way to alert operators.

REAL have published a new position statement available on the BCS website. There is a new request form that operators will need to provide labs with from the 1st of November 2021 for parallel testing or use of own inoculum only. Operators will need to request this form and a code from REAL to show the lab they have received authorised for using their own inoculum. This form is for use for RBP tests with own inoculum only and made available on request from operators who have had an invalid test result.

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

REAL to consider whether it is necessary for multiple samples to be tested within the same retention period when conducting the next review of PAS110

GP confirmed that this has been recorded for the next review of PAS110.

REAL to discuss with REA or EA whether manure-based digestate producers will be notified of the potential QP review outcome/change in waste status, and included in revision process

REAL to notify REA that operators of manure-based AD plants may not be aware of the implications of the QP review for the waste status of their digestate

REAL has discussed the two actions above with the REA. The REA have highlighted this in their mailouts. REAL and REA are not aware of any other organisations engaging with this issue but potentially the best

route for this may be through the NFU. Though it is still unclear what the EA's plans are for the QP review, including in relation to manure-based digestate.

GP gave a general update on the progress of ADQP revision, confirming that REAL have signed the T&Cs with the EA and will be involved in the Task and Finish Group, meetings of which have not been scheduled yet.

REAL to inform REA of clash between TAC and ADQP review workshop and check if webinar could be recorded for the benefit of those unable to attend

The webinar was recorded and distributed to the relevant individuals. The recording is still available if anyone needs it.

REAL MDWG to consider capturing real world evidence/anecdotal information on the various benefits of digestate

This has been referred to the MDWG and is an ongoing action as the MDWG have not met since the last meeting of the BCS Operators' forum. The meeting was postponed into next year due to uncertainty over the QP review and delays on the DEFRA consultation on EU Fertiliser Regulations.

The MDWG is also looking to streamline its work with the work of the REA Digestate Working Group as there is overlap in the aims of these groups. Operators agreed it would be useful to see the terms of reference for the REA Digestate Group.

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

SW to talk to TB about use of digestate on OSR after frosting to take to the MDWG for discussion and exploring further

TB informed the group that this action is ongoing.

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

REAL MDWG to further discuss ammonium scrubbing/ammonium sulphate/acidification

This action is ongoing and will be on the agenda for the next MDWG.

GP asked operators for their views on the low attendance at the Understanding Test Results webinar, asking if it is evidenced that this webinar is not needed and if REAL could look at developing webinars on other topics. GP gave the background of this webinar, explaining it was originally developed for CCS but given there have been so many discussions on the RBP test, it was suggested in the TAC that REAL share more about how the test works and a webinar is the best platform for this.

JC suggested that this low attendance could be due to lack of motivation to get involved if operators have never had a problem with testing, while those that have had an RBP issue are now very familiar with the test and would not feel a 'beginner' course on the subject is relevant for them.

Attendees agreed that the webinar content sounded useful, but the title and marketing it as beginner level did not inspire attendance and that they could review future communications on the webinar.

JC then raised an issue she had experienced around RBP; several invalid results were not picked up until the Certification Body noticed, it was not clear whose job it was to check through results and pick these issues up earlier. The scheme does not currently require a *named* PAS Responsible Person whose role this would be if this were included there may be more motivation for the PAS Responsible Person to attend webinars. AC agreed that the duties of a PAS responsible person should be specified in the QMS, so that operators can better understand their responsibility.

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

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

JC asked if there were any HACCP or PAS 110 training courses upcoming and if there was a schedule. GP confirmed that there is a PAS 110 course scheduled for December and clarified that both the HACCP and PAS 110 courses are run by the REA.

TM commented that it is occasionally hard to keep track of what's happening and when and asked if the details for the PAS 110 course will be circulated soon, AC agreed and suggested that the REA and REAL work together to create a calendar of training courses each year.

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

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

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

4. Feedback from the last Technical Advisory Committee meeting

JC gave a brief explanation of the role of the TAC and forum for attendees new to the forum. JC reminded operators that the opportunity to submit research proposals will be opening in the new year and that SN will cover this more later. JC then went on to discuss inoculum inhibition, summarising that the current procedure if operators get invalid results is to contact REAL as soon as possible to get approval to use your own inoculum. AC added that operators need to let their CB know as soon as possible also to avoid any problems at audits. JC agreed and finally commented that one of the projects approved for Research Hub funding in 2021 relates to the RBP test and there is proactive work and research seeking a solution to the growing number of cases of RBP invalid results.

5. Updates on the Research Hub and discussion on submitting proposals

TA delivered an update on the second project. The brief of the project was: “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”. The research aims were:

- Compile information on the diversity of digestate characteristics produced in the UK
- Record how digestate characteristics relate to feedstock(s)
- Conduct a literature review and stakeholder engagement
- Engage with BCS (wider UK) and European AD operators
- Examine commercially viable valorisation options

TA then described the methodology, the key deliverables, the Data Pack and Project report, and the Research Team’s expertise. TA went through the data sources and methods, showing examples of the outputs of each source. Data pack information sources included the BCS database (~800 datasets), peer reviewed literature reports and specialist analysis into Microplastics and Dewaterability. For the project report, an online operator survey was conducted, covering topics such as feedstock type and uses. This lead into the stakeholder engagement; focused AD operator engagement built on the responses to the survey, there was also wider stakeholder engagement and German stakeholder engagement.

AC queried if sulphuric acid arising from the gas line and scrubbers could be used in the process. TA recognised the potential benefits, but said the regulatory situation is unclear. It has been put forward as a suggestion for the QP revision. JC then asked how operators will be able to engage with this project once completed. TA answered that it will be accessible to all operators, but it is up to the Research Hub ultimately how it will be disseminated.

GH thanked TA for his presentation and SN commented on how valuable this project will be.

SN explained his involvement as Hub advisor as well as the aims of the Hub: to address and investigate problems to maintain the robustness of the compost/AD industries as well as seeking innovation and solutions to commonly faced issues. SN explained there is a call for research proposals at the start of each year, previous experiences of receiving proposals prompted SN to consider if there needs to be an earlier stage in which he can assist operators in formulating their ideas into research proposals.

SN gave an update on Hub projects, explaining that in 2019 the Research Library was approved for funding and that this is complete and accessible to all on the BCS/CCS, in 2020 the project funded was the Digestate Data Pack. In 2021 two projects were selected for funding, the first is relevant for CCS and is on the PRT and tender for this finishes at the end of the week. The second was proposed by JC and seeks to investigate alternatives or improvements to the RBP test, this project is not yet out for tender.

SN then presented an overview of the selection process for research projects: early in the year there is a call out for research proposals, these are collated and SN sorts into proposals that overlap and those that have robust aims and would make successful projects. In April SN will work with those that have submitted proposals to produce a short (page and a half) summary of the proposed project and in May a survey is sent out to operators to ascertain which projects have most industry support.

SN commented that this survey does not have as many responses as REAL would like and it had been suggested in the CCS Forum that SN running a session before the survey to go through the proposals could be useful. SN continued to explain that the panel then meets to create a shortlist of proposals and SN helps to create more substantive project summaries and in July, the panel meets again to decide on the project to be taken forward and a project management team will be set up.

SN then set out the five evaluation criteria that are used to access proposals, and their importance in considerations (percentage of consideration given in brackets) these are:

- 1) Maintain the robustness of CCS and BCS and their associated standards – SN explained that ensuring quality outputs is therefore a priority as one set of adverse comments could be damaging, especially as some parts of the media are against the recycling industry and so will pick up on any negatives (20%).
- 2) Support development of appropriate standards – For example do testing methods need updating or changing (30%)
- 3) Maintain confidence in markets 20%
- 4) Support growth of markets 10%
- 5) Identify barriers 20%

GH thanked SN for his presentation and asked for feedback on the idea of using SN to develop ideas into proposals. Operators agreed that this would be beneficial as creating a robust research proposal is a skill. SN invited operators to contact him using the email on his PowerPoint presentation.

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

AC asked if the results of the Research Hub projects would be published in journals. SN agreed there would be benefits to publishing research especially to allow environmental regulators to access evidence needed for QP revision, but whether these can be published depends on the contractual relationship between REAL and the contractor.

Action: 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

GH then asked operators if they agreed that SN delivering a session going through proposals before the survey would be useful, all agreed it would be beneficial. GH thanked SN for his time and SN expressed he is eager to encourage as much involvement from operators with the Research Hub as possible.

6. Issues raised with BCS Operators' Representative

JC and TB had not had any issues brought to them by operators that had not been covered during the meeting already.

TB asked if anyone else had been experiencing problems with couriers getting samples to labs on time. GP commented that the labs should not be suggesting invalid results from late delivery, as there are no transit time requirements under the scheme. Requirements for operators relate primarily to when sample is to be dispatched after taking it, and there is guidance on the selection of couriers. The lab can still test samples that arrive outside the recommended 24-hour or 48-hour windows. REAL had clarified this over the summer, and issued a guidance note to labs stating that there are no strict rules on sample transit. TB and AC both reported that this was not their experience, as the lab told them due to the late arrival of the sample, the CB would not accept the result as valid. AC suggested to operators that on occasion you may not want your samples tested for example if it arrives 5 days late, due to microbial regrowth, but this is up to the operator if they want to proceed.

Action: 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

TM then raised that he had seen in garden centres bagged solid digestate marketed as an alternative to peat, and he had received queries as to if this is something that BCS sites could produce. AC noted that this solid digestate will have been produced by crop only plants and that the ADQP not allowing horticulture as an end market is preventing BCS operators from engaging with this opportunity. JC agreed, adding that the MDWG will likely investigate this, but it is dependent on QP revision. GH queried if it had been proposed in response to the call for evidence on the QP. GP commented it would likely be considered during the ADQP revision process. JC added that even if the EA say there is not enough evidence to support the inclusion of this market during this QP revision, operators can make use of the Research Hub to propose research into this for future reviews/revision.

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

7. An opportunity to discuss other issues raised by operators

AC raised an issue that a front-end pasteurised site had been experiencing; following high temperatures in summer, some of the biology inside the digester had been killed off. The best way to deal with this is to reseed the bacteria using unpasteurised slurry. However, this adding of a small, controlled amount of unpasteurised slurry means that the site had to relinquish their PAS 110 certification. AC suggested that

this is overly harsh as the purpose is to improve the operation of the digester, and that perhaps some sort of position statement should be created for this situation so that the operator does not have their certificate suspended. GP informed this issue would be taken to the TAC to seek advice.

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

8. Any other issues or topics to raise

GP took this opportunity to remind operators that they should schedule their audits as soon as possible for renewal of their certification, as REAL had received reports from the CBs that in some cases this had been left too late, too close to the certificate expiry date, which had resulted in withdrawn certificates. GP reminded the attendees that audits can be scheduled as much as 3 months prior to the renewal date and that there is no reason why operators shouldn't seek to do this as early as possible. AC noted that this may have been more of a problem for the remote audits due to COVID-19 as there was lots of paperwork to submit which is easy to put off.

GP then asked operators if they had any feedback on how to increase attendance at forums or if there was anything that could be done to improve them. GH added that this was included in the survey REAL had sent out to operators and suggested they fill this in also.

TM suggested that the main barrier to attendance is having the time to do so and added that it is not uncommon for significant proportions of the industry to not get involved. JC agreed on this, suggesting that it is a sign that most people on the scheme are content with the way things are and compared to CCS, the BCS attendance is likely to always be lower as digestate is not the only output of AD.

IC raised that he had struggled to find out that this meeting was occurring, and that the earlier suggestion of a calendar of upcoming courses should also include upcoming meetings as this is easier than looking through websites. GH suggested that perhaps REAL could send out mass invites (Outlook/Microsoft Teams) to meetings/events as this way it will be automatically added to calendars. GP agreed this would be useful but considered it may not be possible in terms of keeping people's contact details private. GP added that a mass invite may not work when meetings return to being in person also, as there are attendance limits due to meeting room capacity. AC suggested that in future meetings should be a mixture of in person and virtual, to allow for maximum attendance but also the more effective discussion that can be held in person.

Action: REAL to consider joint events calendar with the REA for operators

Action: 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

END

Actions

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