

CCS & BCS TAC Spring 2023 Catch-Up Minutes

Thursday 30th March 2023, Online

Attendees

Stephen Nortcliff	Chair
Georgia Phetmanh	REAL
Emma Laws	REAL
Thomas Aspray	REAL Technical Advisor
Megan Muller-Girard	REAL Research Hub
Gregor Keenan	CCS Producers' Representative
Jo Chapman	BCS Operators' Representative
Roy Lawford	OF&G
Nick Johnn	ACL
Sophie Arguile	NSF
Robert Evans	NSF
Fiona Donaldson	SEPA
Gillian Mannix	UKAS

Welcome and apologies.

SN welcomed everyone to the meeting, and delivered apologies from Sarah Pitcher, Elizabeth Cooper, and Kathy Nicholls who were unable to attend.

It was agreed that MS Teams might now be a more suitable platform for these catch-up calls.

ACTION: REAL to move TAC spring catch-up from telecon to MS Teams

Update from REAL

Scheme status

EL gave the following update on the numbers of processes on the schemes:

On CCS, there were 175 certified processes (no change from the last meeting): 137 in England, 21 in Scotland, 11 in Wales, 5 in Northern Ireland, and 1 in the Republic of Ireland. There was one site currently suspended. In total these sites were processing ~4.0 million tonnes of input per annum and producing ~1.8 million tonnes of output per annum. Again, this had not changed from the last meeting.

On BCS there were 106 certified processes (an increase of 5 since the last TAC): 78 in England, 13 in Scotland, 8 in Wales and 7 in Northern Ireland. These were processing ~5.0 million tonnes per annum.

2023 events calendar

EL informed that REAL will be sharing Schemes, Hub, REA, and other relevant industry events on the new events page of the CCS and BCS websites. REAL added this page following feedback from operators that it was difficult to find when REAL and REA events were occurring and to keep track.

REAL have now added all the CCS/BCS events for 2023 (and will continue to update the page with new ones and remove ones which have passed). Currently the following events are listed on each site:

CCS:

- Understanding PAS 100 Testing Webinar 31st March 2023
- SQCS Workshop 19th April 2023
- CCS Producers' Forum 17th May 2023
- CCS Producers' Forum 4th October 2023
- Sampling Guidance webinar 6th October 2023
- Understanding PAS 100 testing webinar 20th October 2023

BCS:

- BCS Operators' Forum 24th May 2023
- Understanding PAS 110 testing webinar 22nd September 2023
- Operators' Forum 11th October 2023

SN queried if these pages were public or if only scheme participants could access these pages.

EL confirmed that these pages are public.

Laboratory T&C's

TA explained that the annual review and revision of the T&Cs, involving both the CBs and labs, had been completed. There was a large textual change to the T&Cs involving REAL's legal advisor, and the T&Cs are now included as a schedule to the contracts between the labs and REAL. The T&Cs are still available to view as a standalone document on the CCS and BCS websites.

Reappointment of labs

GP confirmed that following the independent audit round last year, we reappointed all three labs again for 2023. NRM and Eurofins, (ATL is now Eurofins following the acquisition and company name change), were re-approved under both CCS and BCS and D&F was re-approved under CCS. This decision was

taken following discussions with the CBs and lab auditor about the non-conformances raised, and recommendations from the auditor to reappoint all three labs after receiving responses from the labs.

Reporting templates

TA explained that REAL is in the process of updating the laboratory Reporting Templates.

Firstly, the redundant parameters for CCS have been removed. On BCS, an additional sheet has been added about the RBP plot, to give labs guidance on the standard format. Plots still will have to be requested and will not be reported as standard.

Additionally, there will now be four templates; a Scotland template has been developed for each scheme so that the SEPA plastic limit can be reported.

REAL have sought feedback from the labs on these templates and will implement them alongside the new analysis request forms.

Analysis request forms

EL updated that initial draft analysis request forms were sent in December last year to CBs, and then to the labs in January. The key changes from the current versions were:

- Addition of a note to clarify how to classify a retest during validation (i.e., Sample type 1 not type 3)
- Removal of “optional” from the sample taker field
- Creation of a separate form for Scotland – to enable labs to identify which plastic/physical contaminant limit they should be assessing against.

REAL then revised the draft forms following feedback from the labs and sent the revised drafts to the CBs in mid-March. They will be shared with the labs shortly.

The key changes from the December versions were:

- Removal of Organic Matter as an optional test, as this is included in stability testing (CCS)
- Removal of the third analysis package as organic matter was the only additional test for this package and it's already included in the mandatory tests (CCS)
- Addition of box explaining modifications to the form are not acceptable
- Addition of a note explaining that REAL should be contacted for a certification code by applicants

We have also updated the optional tests box to include parameters like molybdenum (CCS).

Finally, REAL have added “for certification purposes only” to the title of each form to make it clear that these optional tests should only be requested as optional tests for certification purposes, i.e., depending on the market/customer requirements.

Database and test results

GP shared that REAL are currently updating the central database in response to recent Microsoft and Google security updates which were introduced several months ago. These updates and this programming work resulted in the CBs no longer receiving test report pass and fail notification emails directly from the database since the end of October last year. The Microsoft and Google updates mean that the existing system the database was using to download results from emails no longer exists, and REAL’s database programmer is currently working on updating the system.

Currently all the test reports uploaded by the labs since that time are stuck somewhere and not stored in the database. The issue was investigated and identified in November and our database programmer has since been writing in new code to enable the test results to be uploaded and has been working with REAL's IT team. REAL are awaiting confirmation from the IT team but based on the recent correspondence, it looks like we may need to find an alternative system or solution for uploading test reports to the database, which we'd implement with our existing database and the labs.

In the interim, auditors are obtaining test reports on-site from operators. Many of the operators will have been audited over this time period and AD operators may not have been spreading digestate during the last several months. We're working hard to find a solution and once complete, we'll confirm guidance to the CBs for following up with operators regarding test failures received by operators over 4-6 weeks prior. We'll provide a further update at the summer meeting.

SN noted that he has experienced similar issues caused by these sorts of updates, and that it is frustrating, but is out of REAL's control.

Scheme Rules

GP detailed that following the TAC meeting last November, REAL introduced changes to the draft versions of the new scheme rules in relation to the technical issues raised for discussion at that meeting around the use of the CCS conformity mark when printed and also on remote auditing.

REAL have been in discussion with the CBs after liaising with the regulators and formed a proposal for a risk assessment which would be used by the CBs to decide if an operator would be remotely audited or physically audited the year after the renewal audit. REAL haven't concluded discussions with the regulators relating to the risk assessment but are now in discussion with UKAS regarding the formal review of the CCS rules.

UKAS will be carrying out a formal review of the CCS rules soon to determine whether the changes are still suitable for accreditation. REAL will then address any comments arising from this review, before publishing the rules. It is likely that we will remove requirements around remote auditing and continue discussions with the regulators outside the revision process.

We don't have a timeline for the formal review yet, but will update everyone at the next TAC meeting on the outcome and the scheme rules in general.

CCS & BCS position documents

GP explained that the new versions of the CCS and BCS position on technical requirements documents are ready to be published but we're waiting for the scheme rules to be published so we can issue them together and set appropriate transition periods for operators.

There's a possibility that the co-storage of product status digestates section won't be included in this version due to ongoing discussions with one of the environmental regulators following comments on this draft position. We will also be looking to discuss the newly draft BCS position on testing requirements for co-operatives and operators spreading on their own land with all the environmental regulators before including this section in the new version.

WGs and PRT project

GP informed that REAL have been discussing and considering how to take the existing working groups forward or whether to introduce new working groups to explore solutions for specific issues such as the acceptance of certified compost by the growing media sector. Though our focus over the last few

months has been on how to take forward the PRT Hub project which was submitted to the Hub by the PRT TWG but didn't receive any tender submissions.

REAL are currently exploring internally what avenues we can go down to develop and deliver the project and will likely involve the PRT TWG at a later date.

Update on the Research Hub

MMG first introduced herself as this was the first TAC she had attended. MMG then issued a reminder that the Hub's call for proposals closes on the 31st of March, and people should submit any last-minute proposals today. She then explained that these will be evaluated for funding by the Research Panel this summer.

MMG detailed that the two completed projects remain available for use, adding that the Research Library is regularly updated with new articles and NNFC have been contracted for another year to maintain and update library content.

MMG then gave an update on the RBP project: "Evaluation of the potential for the improvement of the Residual Biogas Potential test and investigation of alternative test procedures for PAS110 biofertilisers". This project is progressing and is expected to be complete by June 2023 and Aqua Enviro are currently seeking sample material from sites with high ammonia and ongoing issues with non-responses.

MMG explained the progress on the projects selected in 2022 projects:

Firstly, on the GHGP project "How the benefits of applying compost and digestate to soils can be accounted for under the Greenhouse Gas (GHG) Protocol", a contractor has been appointed and REAL are working on negotiating the contract. We hopefully will be announcing this soon.

On the plastic method project, "Plastic contamination method assessment: Evaluating current mass-based method and possible alternative methods of assessment for plastics in compost and digestate", a few bids have been received and the tender evaluation process is ongoing. A decision should be made shortly.

Update from the Certification Bodies

ACL

NJ informed that one of their auditors has left so they are looking to hire someone new, and that they have received no complaints.

OF&G

RL had received no complaints and had no staff changes to report.

NSF

SA explained that there have been no major changes since November but did comment that she has noticed many compost processes have been withdrawn over the past few months. Though there have been a similar number of applications.

Update from the Approved Laboratories

GP again delivered apologies from Sarah Pitcher who had sent the following update for GP to share on behalf of the labs: the labs had no urgent issues to report, they have been working with REAL on the changes to the Reporting Templates and Analysis Request Forms, the labs have noticed some changes in availability or supply of peat for the Plant Response Test, which TA and GP have been made aware of and are producing a proposal for the Research Hub on Peat Supply.

RL commented that, on peat, OF&G have had some issues with this on their organics scheme, DEFRA are phasing peat out, and it will not be allowed in professional use by 2028. Some on their organics scheme have been unprepared for changes and are facing consequences now, so it is important that REAL/the labs trial and find a solution in advance. Additionally, Roy noted that two CCS sites with OF&G that are linked to a major peat supplier are discussing withdrawal due to economic challenges in their parent company, so evidence that this supplier is struggling/shrinking.

Technical issues

TA explained that REAL had only one technical issue to seek advice on, which relates to a specific operator. This operator currently has one certified process producing PAS 110 Quality Digestate, and they are wanting to certify a new process, which is on a separate line with a separate pasteuriser. This operator would like to store the outputs of both processes together in the same tank at the end. Does anyone have any concerns or issues with this?

TA had discussed this with Kathy Nicholls the week prior who could generally not see any major issues, considering the scheme rules could cope with this, but their HACCP and SOPs would need amendment. Though so long as they were compliant re water and spreading regulations, she saw no major concerns. TA added that the operator had already recognised that there is a higher risk of failure, as if one process fails, both will fail as co-stored.

FD commented that her first thought is that this operator will be mixing two products, so she has no worries about it there, but they will need to know nutrient content for final spreading. Otherwise, she has no major thoughts that they could not do this.

GK added that he assumed they will need an additional layer of operating procedures for if something goes wrong with one of the processes.

There was general consensus that other than nutrient content and dealing with a failure, there were no issues with this operator co-storing their digestate.

ACTION: REAL to consider comments and feedback from TAC on whether the mixing and co-storage of product status digestates produced by two different processes on the same site by the same should be permissible.

ACTION: REAL to draft new section on mixing and co-storage of product status digestates for BCS Position document.

AOB

Update on QP revisions

EL delivered an update on the progress on the QPs since the last TAC meeting in November: on the 10th of November 2022, the Task and Finish group met and the timeline for revisions was discussed in further detail, the group then met again in February focussing on market specifications, standards, and comparators. In March 2023, REAL held workshops in collaboration with the REA and ADDBA, on changes to appendix B and a paper has been shared with Industry on this. REAL are accepting feedback on the changes to Appendix B until the 3rd of April, the Task and Finish Group will then meet again in April to discuss this and the Risk Assessment work.

The timeframe for this work will be dependent on the scope of the risk assessment.

SN queried if there were likely to be big changes to Appendix B.

EL explained that it is mainly replacing 99 codes in line with RPS 241, removing inputs that people do not use, and then bringing in inputs that people have requested.

SN thanked everyone and closed the meeting.

Actions:

- REAL to move TAC spring catch-up from telecon to MS Teams
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- REAL to draft new section on mixing and co-storage of product status digestates for BCS Position document