



Operators Forum Meeting Minutes

Tuesday 20 June 2017

Trinity Centre, Cambridge Science Park, Milton Road, Cambridge, Cambridgeshire, CB4 0FZ

Chair: Justyna Staff

Attending:

Justyna Staff	REAL
Georgia Phetmanh	REAL
Bryan Lewens	GWE Biogas
Tom Brown	Andigestion Ltd
Edgar Blanco	Andigestion Ltd
Jo Chapman	AC Shropshire Ltd
Angela Cronje	Earnside Energy Ltd

1. Welcome and introductions

Justyna welcomed everyone to the third meeting of the Operators Forum. She explained why the Forum was introduced to the Biofertiliser Certification Scheme, clarified the purpose of the Forum, and clarified the remit within which issues can be addressed. The meeting started with a quick roundtable introduction and was attended by Jo Chapman, the BCS Operators' Representative.

Justyna explained the relationship between Renewable Energy Assurance Ltd (REAL) and the Renewable Energy Association (REA), the company administering BCS and the trade body and sector groups within REA representing the industry. REAL is a subsidiary company of the REA and is the Scheme Owner of the BCS. We are responsible for administering the Scheme and our work is not influenced by the activities of the trade association. The REA is a trade association and provides a voice for its members. The Organics Recycling Group (ORG) and the Biogas sector group are trade body sector groups within the REA that work to represent the industry in a policy and regulatory context. Their activities are separate from our own, although we work closely with our colleagues.

2. Scheme update

Georgia presented some figures on the status of the Scheme and the growth of the Scheme between 2010 and the present day. There were 60 certified plants processing over 3 million tonnes of feedstock annually. The Scheme has experienced significant growth since 2014 when there were only 17 plants certified. Operators speculated that this significant increase in members between 2014 and 2015 could be due to revisions made to the PAS110 standard, such as changes to the digestate stability criteria. Operators also speculated that reasons why plants might not choose

PAS110 accreditation could include the misconception that PAS110 is too onerous, complicated, and daunting. It was suggested that more guidance is given to applicants and a more realistic checklist/step-by-step guide for applicants is developed to enable producers to join the Scheme.

Georgia also presented the latest Scheme developments concerning the appointed certification bodies and appointed laboratories. NSF Certification (NSF) and Organic Farmers & Growers (OF&G) were reappointed following their strong tender submissions in response to a tender we opened last year. We are confident that they will continue to deliver efficient certification services. It was announced that a third certification body has been appointed recently – Aardvark Certification Ltd. The appointed laboratories, ATL and NRM, were fully audited earlier this year and we are awaiting recommendations from the independent auditor regarding their appointment under BCS. We received copies of their audit reports; the auditor commented on significant improvements made since initial assessment and high levels of compliance with the Terms & Conditions (T&Cs).

3. Discussions prior to the meeting

Georgia provided an overview of recent discussions which might be of relevance to operators. Scottish Quality Crops (SQC) opened a consultation on 'Digestate produced by Anaerobic Digestate (AD) Plants Consultation on use within the SQC Scheme'. They hoped to agree a robust level of accreditation and audit required on green-feedstock AD plant digestate. REAL submitted a consultation response outlining our position and why we believe all digestate should be certified to PAS110 regardless of feedstock materials. A discussion was also recently had regarding pot ale and pasteurisation. We received an enquiry regarding whether there is a requirement for pasteurisation for a site taking in pot ale along with farm clops and glycerine. The certification bodies and REAL agreed that pasteurisation is not necessary if there has already been a pasteurisation step at the distillery. There's an exemption in PAS110 (clause 7.2.2) but this pasteurisation step would need to be proven. Operators suggested that they request some form of declaration from the distillery.

4. Discussion during the meeting

The second half of the meeting involved interesting and engaging discussions involving subject matters from physical contaminants testing to the addition of biochar in the AD process. Below is a brief summary of the discussions and action points from this meeting:

- Reasons for not choosing PAS110 accreditation/certification. PAS110 is often perceived to be too complicated or the application process is perceived to be too daunting. Technology developers often don't take PAS110 requirements into account e.g. pasteurisation.

Action: REAL to consider creating a more representative/realistic checklist/step-by-step guide for applicants

- 'Abuse of PAS110' and the scope of the Scheme. Once digestate leaves the sites then it's no longer the responsibility of the operator to ensure digestate is spread for agronomic benefit. There is currently no control or regulation for handling of digestate outside of the Scheme. The revised ADQP changed the requirements for certified producers to provide guidance only. We discussed whether the scope of the BCS should be widened.

Action: REAL to discuss with farm assurance schemes at the Oversight Panel meeting

- Issues concerning plastic contamination and the current physical contaminants testing. Operators expressed concern over test method because some incidences of plastic not being detected in sample but visible on fields. The plastic screws up and passes through the 2mm sieve. Producers are making their own changes to remove plastic contaminants from their process/digestate. Justyna presented the findings of the WRAP physical contaminants report and explained the discussions we are having regarding sampling methods, bleaching, the area method for analysis and classification of physical contaminants.

Action: REAL to continue working with laboratories on report recommendations and discuss the physical contaminants test during the meeting of the Technical Working Group

- The next review/revision of PAS110. Operators queried whether PAS110 is due to be reviewed or revised. Justyna explained that PAS110 was reviewed in 2016 (although the industry was not aware) and is therefore due another review in 2018. Revision is different from review and would require evidence for change and funding options. One idea to introduce a funding mechanism to support changes is to charge operators (increase fees) but this is still being explored. If revision cannot take place then it was suggested that guidance could be improved/developed for clarification on certain requirements.

Action: REAL to consider further guidance on technical requirements and more comms

- Biodegradable packaging in the AD process. Biodegradable plastics/packaging materials get stuck in the material and food waste comes out in the material at the backend of the process. Separation of plastic and biodegradable plastic is difficult to achieve and laboratories can't distinguish between them when testing. This has been an issue in the industry for a long time and solutions need to be further explored.

Action: REAL to consider during Technical Working Group meeting

- Calculation scale for plastic contaminants. The revised version of PAS110 changed the table of limits for nitrogen and cuts off at 9kg. One operator raised this before and pointed out that some fibres are 14kg or more so taking account of the sliding scale based on total N, a digestate of 14kgN could be adding less plastic per hectare than a digestate of 9kgN.

Action: REAL to raise at the Oversight Panel meeting and potentially allow extrapolation

- Drying digestate as part of the AD process. There was discussion over when to sample if a drying step is included as part of the AD process. Some plants will dry before separation and might not know when to take a sample for testing as the final product because PAS110 does not include information about a drying step and requirements.

Action: consider adding this information and requirements into the next revision of PAS110

- Biochar as feedstock into the AD process. An operator asked whether biochar was an allowable feedstock and if so, can it be classed as an additive? The answer was not clear.

Action: REAL to discuss with CBs during next monthly catch up conference call