



BCS Operators Forum Meeting Minutes

Wednesday 20 May 2020

Online

Attendees:

Georgia Phetmanh	REAL
Molly Rogers	REAL
Gaynor Hartnell	Chair
Olivia FursseDonn	REAL
Jo Chapman	BCS Operators Representative
Kate Lister	Biogen
Lucy Owen	Marches Biogas
Charlie Thompson	AB Agri
Iain Elliott	Duranta Energy
Tom Brown	Andigestion
Angela Cronje	Earnside Energy Ltd

1) Welcome and Introductions

GH welcomed everybody to the forum and initiated a round table introduction. All at the Forum gave consent to be recorded, for the benefit of Nicola Frost, who could not attend.

2) Actions from the previous meeting

GP introduced a new structure of the Forum whereby only those actions from the previous meeting that are not covered elsewhere in the agenda are noted at the beginning.

- *REAL to add dates to newsletters*

This action has been completed and dates will be added to newsletters going forward.

- *REAL to explore whether more laboratories could be invited to the Scheme*

REAL's upcoming newsletters will include information about how laboratories can join the scheme and the application process. CT commented that York University have a laboratory with capacity and information will be passed to them regarding how to join.

- *Jo and Paul to put together a research project proposal for digestate use*

JC reported she had met with Paul from Duranta and that a proposal had been submitted and shortlisted. This project is waiting for further consideration.

- *GP to ask EA about 'AD industry learning from the water industry'*

GP noted that it was not clear why this view was expressed at a Research Panel meeting. GP contacted the EA who clarified that the reason for this suggestion is that most sludge produced and sent to land is through AD and that the water industry has 30 years in biosolids to agriculture.

Action: 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

- *Confirm date and venue for next forum*

This Forum meeting was held online, due to Covid-19.

3) Updates on the BCS

MR reported that as of May 2020, there were 88 certified plants on the BCS. 65 in England, 11 in Scotland, 8 in Wales and 4 in Northern Ireland. There are approximately 4.6 million tonnes of throughput per annum and 59 sites were producing whole digestate, 34 separated liquor and 21 separated fibre. Since the start of 2020, there have been 8 applications to the BCS, 0 suspended certificates and 1 withdrawn (this was a withdrawn application to the Scheme).

BCS Annual Report 2018

REAL published their 2018 annual report in October. MR noted that by the end of 2018, there were 80 certified plants on the BCS, the total throughput was approximately 4.3 million tonnes and that 13 plants in the UK produced more than one type of digestate.

IE noted that it would be helpful for data to be presented in future annual reports on what proportion of sites taking waste were certified.

Action: REAL to aim to include information on the percentage of certified plants in annual reports

PAS 110 analysis request form

GP noted that the PAS 110 Digestate Analysis Request Form must be used with the correct codes to be sent to the laboratories for certification purposes. If the form has not been used, the results will not be used towards certification.

GP reported that the PAS 110 Analysis Request Form has now been updated with a field for the sample name and the form can now be used as a record for compliance with section 10.7 in PAS 110. (This was an action from the previous meeting).

BCS Position on technical requirements: PC testing of SL

This position was presented at the previous Forum and questions were raised regarding terminology and the implementation period for operators testing for PC with a screen size with 1mm.

The use of the term 'particles' was raised for potential change in the document. GP discussed whether this should state 'PC particles' with the CB's. It was agreed that this position only refers to PC's and the term should remain as it is within the document.

JC noted that an operator went through certification last month and that there was confusion around this subject– it would be helpful to relook at this considering the experience.

Action: REAL to clarify use of the term ‘particles’ in the BCS position with auditors

There was an action from the previous meeting to discuss the implementation period for changes to the technical requirements. This was discussed at the TAC meeting in October and a suggestion was made for the implementation period to align with UKAS, which is three months. This has now been adopted and the deadline was 9th March 2020.

Laboratory Approval Scheme

REAL have developed a new framework for Laboratories that undertake testing under BCS/CCS. This Scheme has been running since the beginning of the year and involves the CB's in the laboratory approval process.

Both laboratories were audited for the 2019 round of joint BCS and CCS audits and the auditor wrote letters of recommendation that expressed support for both laboratories to continue for a further 12 months. Both laboratories were reappointed for 2020. In 2020, the laboratories will be audited against a new set of T&C's.

Last year, REAL ran an open tender process for an independent auditor to carry out laboratory audits between 2020-2021. The Open University has been appointed to conduct laboratory audits and Graham Howell will be leading the audits. Graham has experience with the Scheme specific test methods.

KL reported that they had received a failure on a test result which had come as a surprise to them. ATL concluded the sample was a fail on the RBP test. There had been a mechanical error and they had taken the result from an average of 2, not three samples. With the support of OF&G, a fresh sample had been split, with half sent to ATL and the rest, for comparison, to NRM. ATL had another mechanical error and based their results on two samples, and the result was 0.38 L/G volatile solids whereas the result from NRM was significantly different, at 0.18. GP noted that there are ongoing discussions with the CB's regarding these test results and that this issue would be discussed later in the meeting.

UKAS accreditation

Certification Bodies will be gaining accreditation for ISO 17065. In 2016, UKAS provided a report on the suitability of the Scheme and documents. Comments that were provided on the Scheme Rules were addressed in 2018 in the revision of the Scheme rules.

Covid-19

Site inspections are no longer taking place and are instead being held remotely with the use of real time video conferencing technologies. A spot inspection at the applicant's site will be carried out when it is safe and possible to do so.

4) Updates on the Research Hub and MDWG

Research Hub Update

NNFCC has been appointed as the contractor to carry out the first project of the Research Hub 'The development of a Research Library for the Organics Recycling Industry'. The aim of this project is to compile all research done in composting and AD industries to date and create an online library of this research. NNFCC will be carrying out a literature review of all research that has been conducted across the compost and AD industries. It is NNFCC's intention to categorise this research and

produce 'thematic summaries' (to be displayed within the digital library) to introduce each topic/research area identified.

As part of the literature review, NNFC will engage with BCS Operators in what an 'Industry Needs Assessment' to gauge Operators opinion on what areas they perceive to be lacking in research/need driving forwards. The results of the literature review and the gap analysis will be incorporated within the website. The project is due to start in June and expected to finish in January 2021.

REAL ran a second call for proposals from 24th January to 4th March. The Research Panel met in March to evaluate the proposals and 3 projects were shortlisted to go through a second round of evaluation by the panel. Stephen Nortcliff is currently discussing the project proposals with the submitters for the second evaluation round.

Update on MDWG

The MDWG issued a survey to gather views on potential additions to the QP's in relation to inputs and markets. This survey received 10 responses on behalf of 14 sites which were discussed in January. At the meeting, the MWDG focused on the QP reviews and worked through the call for evidence questions. The MDWG produced work which fed into REAL's response for the call for evidence period with a view of supporting the ADQP, as this document underpins the BCS.

4) Updates on the PAS 110 and ADQP reviews

PAS 110 Review

The PAS 110 review started at the end of 2018 where discussions with operators regarding a review were initiated. There were further discussions regarding PAS 110 at the TAC meeting at the start of 2019 to seek views from operators on whether there was a need for an update.

The review process was finalised at the start of 2020, and the final meeting with BSI was in March. Prior to the meeting, a letter was sent to BSI outlining the view that now is not the right time to initiate a revision process. Comments on technical updates have been recorded for the next review.

ADQP review

In December, the EA announced the QP review call for evidence period for the ADQP, which closed on 31st January 2020. The EA invited industry to comment and provide evidence to inform their decision on whether to continue or withdraw support for the QP's. REAL had circulated the EA's template for gathering evidence for the review to all participants.

REAL holds regular liaison with the EA through the Biowaste Regulatory Forum (BRF). PT from REAL aims to seek clarity from the Agency on timings, scope, and evidence expectation. The EA planned to publish the outcome of the initial review at the end of May but due to Covid-19, this will be postponed. It is expected that the industry will need to fund the revision costs which is estimated at £20,000 per QP. Industry would have three months to respond to the EA's decision and if there is no clear commitment to fund revision by that period, the QP would be withdrawn. If the industry wishes for additional changes to the QP's, the onus is on operators to provide sufficient evidence to justify the proposals.

CT questioned whether there has been any suggestion on what the EA may wish to support or change. It is REAL's understanding that EWC codes might be added and there might be some codes that come off appendix B.

Operators questioned the evidence period and where they stood regarding organising evidence to submit to the EA. GP clarified that REAL are seeking clarity on whether the three months refers solely to funding or evidence gathering too. IE noted that with the tightening of the ADQP, PAS110 and the scheme rules, there should be a more uniform product going out and farms should be paying towards this and making an improved contribution.

Action: REAL to circulate link to the EA's report on the initial review of the ADQP when published

5) Feedback from the last Technical Advisory Committee meeting

At the last meeting, REAL had taken an action to obtain the draft EA report on digestate pollution incidents. The EA clarified that the report was not about digestate specifically but the AD industry in general and case studies were shared on incidences between 2012 and 2018. The EA clarified that there was no opportunity to comment but the document is publicly available.

REAL had also taken an action to chase the EA for a final confirmation on whether dried digestate is included within the ADQP with an approved and designated market. The EA clarified that it is not. Drying is considered further treatment and it is not possible to achieve certification to the ADQP for this material. If there is sufficient evidence presented during the ADQP review to the EA, this could be added.

REAL had discussed with JC and Andigestion whether to put together a working group for operators that would want DD included in the ADQP, as it seemed that this issue was not taken to a trade body. REAL had liaised with the EA directly and informed them that REAL would be happy to facilitate a meeting between the EA and operators. REAL was informed that a meeting was not possible at that time. No meeting had been held, nor working group established.

TB noted he had some discussion with EA who did not appear to want to change their position. The EA were reluctant to meet but Andigestion did submit evidence to the QP review. Andigestion have certified their DD since the end of 2015 and spoke to other operators to gather their views on this. He reported that their dried digestate is now going out as waste and will have to be deployed.

LO noted that three sites had this issue and that they were told that this was no longer a product with little/no warning and operators were only made aware when their certificate had been withdrawn following an audit. Operators believe there is sufficient evidence for the EA in regard to the QP review.

Action: 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

REAL had discussed with CB's whether evaporate from dried digestate is an allowable input. They required more information. IE volunteered to send information on this, he has looked at a pure system whereby wet digestate is taken (95% water) and reduced down by process with the individual items within that and gives you the final output from evaporation.

Action: Georgia to contact Iain for further information about evaporate from dried digestate and provide it to the CBs.

6) Issues raised with BCS Operators' Representative

JC noted that there is an ongoing dried digestate issue, but there are no new issues to note.

7) Opportunity to discuss other issues raised by operators

RBP testing

The following actions were agreed at the last meeting

- *REAL to discuss RBP related issues with the Approved Laboratories*

NRM reported that they carried out refitting work and moved the RBP testing to a new building with increased capacity.

- *REAL to discuss with CB's whether they should flag operators taking too many RBP samples*

It was agreed that it is the operators' responsibility and the standard sets minimum frequency requirements, some operators choose to take more.

- *REAL to discuss laboratories notifying operators after 14 days of RBP*

NRM informs customers as soon as possible if the sample looks like a fail. Interim reports are not usual practise and has caused confusion before.

AC noted that NRM had subcontracted another lab for testing, NRM would normally alert if there was going to be a fail but due to another laboratory being subcontracted, they did not tell NRM and therefore NRM could not tell operators. If labs subcontract there should be effective communication.

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

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

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

8) AOB

KL's RBP issue mentioned previously was further discussed. When two samples were sent to different laboratories there were ranges of results with a 58% difference.

GP noted that since this issue was brought to REAL's attention, there have been a number of discussions with CB's and labs. Several RBP results are reported in duplicate and reported as valid. REAL have quarterly meetings with the laboratories where they asked them to investigate how many results are reported in duplicate and the reasons for this. REAL are discussing with the CB's the status of the annotation in the standard and that there needs to be further discussion at the TAC meeting in June.

The labs carried out an investigation and produced reports using over a year's worth of data. Between 10-20% of all RBP results used towards certification have been from duplicates where the vessel failed but quality control has been met. In cases where the vessel failed, the third value could have skewed results so was not counted. The labs suggested there would be cost implications for all operators if the average of three tests had to be reported, as resampling would be required. Operators do not feel liable to cover the costs of the test if the fault is at the laboratory.

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

With regard to the discrepancy between laboratories, REAL are looking to develop a Proficiency Testing programme which focuses on scheme specific tests. Several samples will be sent to the labs throughout the year (possibly on a quarterly basis) to monitor performance of laboratories.

The laboratories should be at the receipt of the complaint to investigate any issues. REAL however are not able to represent operators without the full details of incidents and Operators are required to fill out a complaint form to outline what the issue is and contact details for each lab. REAL are kept updated of the investigation whilst it is ongoing.

JC noted that the issue is loss of faith in reliability of the two labs, and with only two labs on the scheme it is hard to know objectively which gives more accurate results.

JC noted a different RBP test issue. This issue was regarding inoculum whereby no matter how many samples are put in, the sample only produces gas after 14 days. This is not a valid test result and the operator in question cannot identify any actions to take despite talking to the laboratory. JC questioned if laboratories can be more reactive when carrying out these tests before a second phase of testing is implemented. GP clarified that the laboratories carry out additional testing with different ratios of inoculum.

KL noted that when looking at feedstock, there are inhibition tests to see if there is anything that could be preventing the AD process. This could be done on the digestate sample in order to rule out the possibility of it containing an inhibitor. If there are no issues, this suggests this is an issue with the RBP test. JC clarified that the operator was using digestate from their own digester as an inoculum and the waste streams are long, established material so it would be surprising if there was an inhibitory substance in the feedstock.

Action: Kate to send Jo details on inhibition testing

All attendees at the Forum agreed that the recording could be shared amongst the group and with Nicola Frost. It was agreed that Zoom was a convenient way to hold meetings and attendees were in support of holding more regular online meetings, with one face to face and three online meetings being scheduled per year.

Action: REAL to consider whether to hold some BCS Operators' Forum meetings online

End

Actions:

- 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
- REAL to aim to include information on the percentage of certified plants in annual reports
- REAL to clarify use of the term 'particles' in the BCS position with auditors
- REAL to circulate link to the EA's report on the initial review of the ADQP when published
- 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
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- REAL to further discuss the provision of interim reports for RBP with the laboratories
- REAL to discuss with the laboratories notifying operators when subcontracting tests
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