



BCS Operators Forum Meeting Minutes

Wednesday 9 October 2019

DWF, Bridgewater Place, Water Lane, Leeds, LS11 5DY

Attendees:

Georgia Phetmanh	REAL
Molly Rogers	REAL
Gaynor Hartnell	Chair
Jo Chapman	BCS Operators Representative
Kate Lister	Biogen
Tom Brown	Andigestion
Iain Elliott	Duranta Energy
Paul Smith	Duranta Energy
Mark Baker	Refood
Simon Walgate	GWE Biogas
Angela Cronje	Earnside Energy Ltd

1. Welcome and introductions

GH welcomed everyone to the Forum and the meeting started with a roundtable introduction. The forum was attended by JC, the BCS Operators Representative.

GP introduced the aim of the Forum; to provide producers with the opportunity to raise, discuss, and submit for the BCS TAC issues associated with certification under the scheme.

2. Actions from the previous meeting

REAL BCS Operators forum 29 May summary notes can be found [here](#).

- *REAL to check when and whether new research project ideas or proposals can be submitted*

There was a total of 13 research project proposals that were shortlisted and banked for evaluation in the next round. GP confirmed that project proposals can be submitted at any time and will be reconsidered at a certain point in the year.

There were questions asked if REAL would consider a 'call' for research proposals at a certain period in the year. GP will investigate and confirm to forum attendees.

- *REAL to invite BCS Operators' Representative to a meeting with NNFC*

REAL are still in the process of arranging a meeting with NNFC.

- *REAL to consider discussing the use of additives with industry contacts*

REAL will soon be publishing a position paper on the use of additives under the scheme.

- *REAL to discuss new derogation clause in BCS Scheme Rules with the regulator*

This is a new clause in the REAL scheme rules (4.2.14 ADQP Appendix B Derogation).

The regulator has clarified that the introduction of this clause does not open the possibility for operators to apply for derogations to wastes permissible under the ADQP but covers the scenario of the EA issuing a derogation.

The EA currently has a list of waste materials already put forward, that will become available. Operators asked whether this is site specific or generalised for all sites. Applications for new waste inputs can be made through the QP review.

The EA will issue a template for adding new waste codes for use when the QP is reviewed.

- *REAL to add structure to BCS Technical Position document and disseminate*

This action has been completed.

- *REAL to check frequency of auditing/assessment under NAAC scheme*

This occurs on an annual basis.

- *REAL to explore use of webinars for future consultations and/or review processes*

REAL are in the process of exploring webinar options.

- *REAL to continue liaising with EA about pollution incident data*

The EA are writing an ad-hoc report on evidence-based pollution incidents in the AD industry, which is currently being put together. There is no timeline for the report or planned publication date. REAL will continue to liaise with the EA on this topic.

- *REAL/EA to consider interim position for operators drying digestate*

This action explored the possibility of an interim position for drying digestate where the nitrogen sliding scale in PAS 110 is extended. The EA advised that an interim position is not typical and not deemed allowable. REAL received an email from EA stating that it is not possible to certify dry digestate under the scheme – drying digestate is a grey area with further discussion on the topic consistently occurring. Operators insisted that if drying digestate is not accepted, there must be a transitional period to allow them to adapt.

- *REAL to share digestate use ideas with the MDWG*

There are other potential uses of digestate that are not currently covered by PAS 110. The QP and PAS 110 reviews are opportunities to seek for their inclusion.

3. Scheme status and updates

GP highlighted the recent BCS communications (Annual Report, summer newsletter etc).

The PAS 110 analysis request form MUST be used by operators from the 1st Jan 2020 and failure to use the form from this date will result in samples not being counted towards certification.

A question had been previously raised by an operator representative on whether final effluent (as described in section 21 of the BCS Position on Technical Requirements [here](#)) can be used in a certified AD process. GP confirmed that it cannot, and this is set out in the position document. Forum attendees noted that the ADQP review offered the opportunity to request its inclusion.

a) PC testing of separated liquor

There is an additional section in the BCS Position on Technical Requirements which states that there must be sufficient evidence that the separation technology used results in all particles being < 2 mm in the separated liquor fraction. This evidence must be submitted to Certification Bodies.

Operators highlighted that plastic film is a problem in this stage. It heats and forms a ball and expands when cooled. It was suggested that terminology used in the BCS Position should relate to plastics specifically -this issue should be referred to the Technical Advisory Committee.

b) Approved Laboratories

Combined audits of the laboratories are currently underway, and the Terms and Conditions were revised last year. REAL are currently setting up a Laboratory Approval Scheme, which introduces the Certification Bodies into the process of laboratory approval.

A tender will be released soon for the development of a Proficiency Testing programme, which is also in the process of being set up by REAL.

There have been cases of laboratory communication breaking down (e.g. NRM samples have been sent to ATL and the RBP test has been subcontracted, due to high laboratory demand without operators having been informed). Operators feel that auditors should make operators aware that the RBP test is only necessary twice a year. If operators reduce the frequency of RBP tests sent to the laboratories, this will decrease demand.

c) UKAS

UKAS accreditation is a component of the Laboratory Approval Scheme.

UKAS provided technical comments on PAS 110 which will be addressed if a revision is initiated.

4. Updates on the Research Hub and MDWG

a) Market Development Working Group (MDWG)

The MDWG is a subgroup of the TAC, set up to maintain market confidence. First meeting agenda items included; establishing its relationship with the Research Hub, exploring the NNFCC dataset and engagement with the NFU. Second meeting agenda items included; digestate processes, PAS promotion and engagement with the Soil Association.

The Soil Association clarified that there was a new interpretation of the EU standard regarding food waste from commercial sources. The new interpretation now allows the use of digestate where the feedstock contains food waste from commercial kitchens, including any processing facility that produces food waste. The digestate must be PAS 110 certified under the BCS and the heavy metal limits are the same as previously.

The ADQP review is currently taking place, whereby the EA will decide if they support the current quality protocol. The MDWG is gathering views on potential additions to the ADQP (and CQP) in relation to waste inputs and new market sectors, through a survey.

b) Research Hub

This is a tool funded by operators that supports research and development in the composting and AD industries. Two projects have been selected to take forward as a result of the first shortlisting and evaluation process from the Research Hub Panel meeting in June. A research library was selected as the first project of the Hub- this was chosen to prevent duplication of research and a misuse of research resource. The Tender invitation document for this project is currently live and the project will be commissioned in early 2020. Project number 2 focuses on reducing plastic in compost and digestate and is a combination of three research proposals.

c) Digestate processing and use

There was a lengthy discussion during the meeting on ideas for market development, considering digestate processing techniques and digestate products, such as drying digestate, and pelletising blended digestate to make a low carbon fuel. There is also potential for it to be used as a building material. At present, there is an overproduction of digestate, and alternative outlets or markets are desirable. Farmers are not prepared to pay for the product.

If there are mandatory food waste collections by local authorities, it would increase feedstock volumes by 30-40%, which would increase digestate production further.

Operators highlighted that there is a WRAP research paper on the uses of digestate in horticulture and asked whether the first project of the Research Hub would pull literature together that is not covered by the scope of the scheme. Operators to propose additional uses to the EA during the ADQP review. It was noted that if any end uses are rejected, a future research project could gather evidence that would support their inclusion in subsequent review.

5. Updates on the reviews

a) PAS 110 review

This standard is to be reviewed every two years or sooner if there is a technical need for a revision. REAL is currently waiting for the EA to complete the initial ADQP review as this will affect the PAS 110 revision process. REAL will seek views from operators and engage with industry if a revision is initiated to PAS 110. The MDWG is gathering views on potential additions to the ADQP (and CQP) in relation to waste inputs and new market sectors, through a survey.

b) ADQP Survey

Post meeting, the survey closed on 23rd October and data from the survey will be analysed by the MDWG to present to the BCS TAC and/or the Environment Agency.

6. Operators Representative Update

The BCS sampling guidance is currently under development.

JC informed the attendees that the wastewater industry performed a gap analysis between the BCS and the sewage sludge regulations. The objective of this was to inform the EA about certain aspects of sewage sludge use, rather than to make any observation on AD or the BCS.

Maleic hydrazide, a material used on stock seed potatoes, has been shown to affect AD plants. Further research has shown that this is not a biocide, it just stops chitting.

7. AOB

Operators asked if sludge from the bottom of a digestate lagoon can be certified. It was commented that this material should be tested and sent for analysis and if it passes, it can be spread under PAS 110.

Spreading digestate on stubbles can be beneficial (if justification is provided by an agronomist), although it is dependent on the nature / type of soil.

Operators noted that co-applying digestate with compost helps to lock nutrients in the soil.

Close

Summary of key actions:

- REAL or Operator Rep to obtain Environment Agency's template for QP evidence gathering
- REAL or Operator Rep to aim to obtain list of waste types already put forward to EA
- REAL to aim to obtain draft Environment Agency report on digestate pollution incidents
- REAL to chase Environment Agency for final confirmation of position on dried digestate
- REAL to add dates to biannual BCS newsletters
- REAL to update PAS 110 analysis request form with sampler name field
- REAL to explore whether evaporate from dried digestate is in an allowable input
- REAL to discuss implementation period with BCS Position on Technical Requirements with CBs
- REAL to discuss RBP-related issues with the Approved Laboratories
- REAL to discuss with CBs whether they flag operators taking too many RBP samples
- REAL to explore whether more labs could be invited to the scheme
- REAL to discuss laboratories notifying operators after 14 days of RBP
- REAL to consider discussing with contractors for the development of the Research Library the possibility of sourcing research for aspects not yet covered
- REAL to consider another 'call' for research project proposals
- Jo and Paul to put together a research project proposal for digestate use
- REAL to consider liaising with EA personnel about ADQP/PAS 110 reviews
- Georgia to ask EA about held view on "AD industry learning from the water industry"
- REAL to confirm date and venue for next Forum meeting