



## Summary Notes from the joint meeting of the Oversight Panel for the Biofertiliser Certification Scheme and the Technical Advisory Committee for the Compost Certification Scheme

Thursday 28<sup>th</sup> June 2018, 11.30 – 15.00, REAL, London

### Attendees:

Professor Stephen Nortcliff (SN) – Chair; Justyna Staff (JS) – REAL; Georgia Phetmanh (GP) – REAL; Gabor Hasznos – REAL; Virginia Graham (VG) – REAL; Gregor Keenan (GK) – CCS Producers' Representative; Jo Chapman – BCS Operators' Representative; Duncan Parkinson – NSF; Sophie Arguile – NSF; Roy Lawford (RL) – Organic Farmers & Growers (OF&G); Nicholas Johnn (NJ) – Aardvark Certification Ltd (ACL); Duncan Rose (DR) – Laboratories' Representative

### Teleconference:

Kathy Nicholls (KN) – Environment Agency (EA); Fiona Donaldson (FD) – Scottish Environment Protection Agency (SEPA); Alison McKinnie (AM) – Zero Waste Scotland (ZWS); Thomas Aspray (TA) – Independent Laboratory Auditor

## 1. Introductions & welcome

Professor Stephen Nortcliff welcomed everybody to the meeting and noted apologies from NFU, WRAP, LARAC, Red Tractor, NIEA, and the Soil Association. We read through the minutes and action points from the last meeting and the majority of actions had already been addressed.

## 2. Scheme updates – REAL

### a. CCS numbers

There were 172 certified composting processes in the UK processing over 3.7 million tonnes of feedstock on an annual basis. Certified sites were producing over 1.8 million tonnes of quality compost on an annual basis. Between June 2017 and June 2018, the amount of feedstock processed annually had gradually increased from ~3.4 million to ~3.75 million tonnes per annum. There had been two new applicants. One certificate had been suspended because the operator informed their CB that they did not want to renew – their certificate was then withdrawn once expired. Two other certificates were withdrawn because the sites had ceased production.

## **b. BCS numbers**

There were 74 certified AD plants in the UK processing over 3.9 million tonnes of feedstock on an annual basis. Seven new plants had joined BCS since the last TAC meeting in November 2017. 54 plants were producing certified WD, 26 certified SL, and 12 certified SF. Since June 2017, 14 new plants had joined the scheme adding ~0.8 million tonnes per annum of processing capacity. There were five new applicants and four had achieved certification. One certificate was suspended following an odour complaint – some of the validated critical limits hadn't been adhered to.

## **c. 2018 plans and projects**

JS presented REAL's project timetable for 2018 to highlight the projects we are initiating or making progress with this year and the estimated timescales to complete them. In summary these are:

- Revising the CCS and BCS Laboratory T&Cs
- Annual independent laboratory auditing
- Drafting a Tender Invitation Document (TID) for Proficiency Testing (PT) schemes
- Designing the BCS database and upgrading the CCS database
- Continued investigation into the plant response test (PRT) failures
- Addressing the WRAP physical contaminants (PC) report recommendations
- Revising the CCS and BCS Scheme Rules
- Setting up specific UKAS accreditation for the schemes
- Reviewing BSI PAS 110:2014 and organising operators' workshops
- Developing workshops for sampling and interpretation of test results
- Workshops for CBs and inspectors on interpreting the new SQCS requirements
- Stakeholder engagement; Forum, TAC/Panel, comms, and development of the MDWG
- Developing the CCS and BCS Research Hub

We are developing the Research Hub further and finalising the governance details. The proposal has been presented and supported by all stakeholder groups so far. The Panel discussed the development of the Research Hub and commented on how it should or could be set up. The Panel advised that it will be useful for individuals to go through a formal process to contribute to the Hub. There was discussion over how to address issues and how to prioritise projects.

## **d. Scheme developments**

GP and GH provided updates on scheme developments that had taken place since the last meeting:

- Issuing of the biannual CCS and BCS newsletters over winter and summer
- CCS and BCS databases: csv reporting templates, collection and extraction of test results
- Revision of CCS and BCS Laboratory T&Cs
- Reissuing of contract with laboratory auditor
- Further data analysis for investigation into plant response test failures
- Certification Schemes' Annual Report 2017
- CCS and BCS cost comparison – waste deployment and renewal of certification
- Proposals for changes to CCS and BCS Scheme Rules
- Setting up of Market Development Working Group (MDWG)

## **3. Updates from the CBs and labs**

### **a. Update from CBs**

DP provided an update on behalf of NSF regarding restructuring, the new team members, NSF membership, member enquiries, and complaints. One complaint was raised with NSF under exceptional circumstances and the outcome was inconclusive. Once the investigation had concluded, NSF made several recommendations to REAL for improvement to complaint procedures.

NJ provided an update on behalf of ACL regarding membership and member interest in BCS due to ACL personnel's expertise and backgrounds in the AD sector. No complaints had been raised.

RL provided an update on behalf of OF&G regarding staff structure, training plans for new staff, and complaints. Two product complaints had been raised with OF&G. One official complaint came in through GP but it was anonymous as the individual didn't want it traced back to them. The Panel suggested explanations for the large quantities of plastics deposited in the lagoon. RL will discuss this with KN as OF&G is unsure how to proceed given the circumstances.

#### **b. Update from labs**

DR provided an update on behalf of the appointed laboratories. The laboratories had attended a meeting with REAL the week before the TAC to maintain contact – quarterly conference calls and annual face-to-face meetings are now taking place. The laboratories might raise comments or issues next week but DR did not have anything specific to raise at the TAC.

One issue NRM had experienced related to the lab repeatedly having to carry out the RBP test due to invalid results. The digestate sample had been causing inhibition of the inoculum resulting in no gas production. The producer is waiting for the results. The laboratory would like to know whether they could change the ratio specified in the method. REAL and NRM will discuss next week.

### **4. Updates from the representatives**

#### **a. Update from CCS Producers' Representative**

GK provided an update from the CCS Producers' Forum in May. He informed that operators still view the PRT as problematic and experience issues. He also stated that there is a lot of grief over feedstock contamination and operators would like to see pressure applied to alleviate the problems.

In relation to the inconclusive investigation into the product complaint, GK thinks it is strange that the compost was spread knowing it was contaminated. He enquired when the complaint was made in relation to the Soil Association finding out. It is strange that somebody has accepted and spread and then somebody else has objected. GK suggested visiting the field now because if the field was heavily contaminated then it would still be visible. GK is concerned about this because it turns into a similar situation related to the loss of confidence by Quality Meat Scotland – all it takes is one complaint. The consequences can be severe and have a knock-on effect.

REAL will be inviting the Soil Association to the TAC meetings. AM pointed out that unless we are confident in the product then any market development will not be worthwhile – we need to step back and look at quality before we look at marketing. This batch of compost was sampled and passed, which raises questions around quality, process, and product. JS mused on the fact that nobody at the CBs roundtable meeting was surprised that we aren't changing the plastic limits in the PAS. The Panel asked whether a sample for subsequent analysis could have been taken and stressed that the material should have been retained for reanalysis. GK advised that we should present photos from product complaints and ask ourselves whether we think this is problematic.

GK also informed the Panel that producers at the Forum weren't aware that auditors offer opinions and the COs make the decision. RL explained that if operators dispute the assessments then they can appeal through UKAS-approved appeals procedures. If not resolved, then it would finally go to REAL. JS informed that all the CBs are involved in updating scheme documents and technical guidance documents based on scheme-related enquiries. We reach an agreement over interpretation.

With regard to the PRT, there is still concern over what to do in the event of a failure. Could operators carry out a secondary test after the failure? If not, then what can they do. What should they do if they can't identify an explanation? How would the CBs know that corrective actions are suitable? Could they do the herbicide test? What could we look at in the plants? The laboratories and REAL will discuss this issue during the next catch up.

### **b. Update from BCS Operators' Representative**

JC provided an update from the BCS Operators' Forum meeting in June. She informed that we all met on site, which worked well. Different views were presented during this meeting compared to previous meetings. The spreading of product digestate was a hot topic with operators involved in the spreading activity to different degrees. The Panel questioned whether there should be more standardised or prescribed rules for the use of digestate. DP informed that there is a spreading module within the Biosolids Assurance Scheme (BAS) that he could circulate. JS asked whether we should have an add-on assurance module for spreading. RL advised that this might be difficult to audit as it was in the past. AM thought it was a good idea; if we have a certified product then we should have a certified contractor. GK informed that QMS are requiring contractors to be certified.

JC provided an update on the Forum discussions around markets and use of digestate. We discussed the subject of adding new waste inputs to the QP and produce evidence to support this through the Research Hub. It was believed that there was reluctance by the Environment Agency to revise the QP. However, KN explained that it was not a reluctance issue but a resource issue. She informed the Panel that this might change. JC enquired whether the EA needs more evidence to support any changes, which could possibly be produced through the Research Hub? KN advised that it depends on what is proposed. KN mentioned that the review of PAS 110 should take place in line with the QP and suggested that we liaise with the End of Waste team to present evidence to the EA.

JC mentioned the discussion at the Forum around the Jacob's Framework and enquired whether this could support more waste inputs in the QP. KN explained that the QP still has to go through the European technical committee and we don't know what's going to happen after Brexit. This will not be high on their priority list. With regard to the Jacob's Framework, KN explained this was useful because there was not methodology to assess waste types before but we have the methodology now. KN warned that any flexibility introduced into the QP could be a nightmare and detriment to the standard – we have to be aware of this. We could use the Framework to build waste types e.g. vitamin capsules. We could suggest specific waste streams and use the Framework. The BCS user group could suggest waste inputs and put them forward for the Environment Agency to consider. It was agreed that the Research Hub is a very positive development and presents a great opportunity.

## **5. Technical Issues**

### **a. Coarse composted material**

REAL informed members of the TAC that we had recently discussed issues associated with the certification of coarse grade compost with the certification bodies. We asked whether we should specify grade size limits for compost. It was questioned why some operators aren't screening. RL explained that some operators supply to satellite sites or to farms and the farmers then deal with it.

KN informed that the Agency is worried about plastics. This activity could jeopardise the scheme and it sounds like disposal activity, which is suspicious. We shouldn't bring down the standard for a small number of operators. The test methods could define the requirements for coarse composted material. DR stated that he would be happy to make this finer and there are limits already in place.

#### **b. Oversize**

REAL sought advice from the TAC on compost oversize and complying with the standards. One operator would like to re-shred their oversize and certify it as a separate coarse grade fraction. We didn't think this practice was acceptable but struggled to find clauses in the standards preventing it.

The TAC stated that oversize shouldn't go out as PAS 100 certified. KN informed that there are problems with contamination and stockpiling – there is a drive to clean up the material. It was shared that some sites can't incorporate oversize back into the process. It was suggested whether we could create markets for the larger fractions or oversize and do this through the Research Hub.

#### **c. Additional requirements for plastic**

REAL asked the Panel whether we should introduce additional requirements into the Scheme Rules to add further controls or checks for plastic content in compost and digestate or would this undermine the quality standards? It was agreed that this would undermine the standards.

#### **d. Drying and crushing digestate**

After the BCS Operators' Forum, REAL and the CBs discussed a technical query presented at the TAC. The query related to whether an operator could process whole digestate through a dryer and then a crusher, which would reduce the particle size of any plastics present potentially to less than 2mm). The CBs and REAL thought that they shouldn't be allowed but there's nothing preventing this.

AIM agreed that they shouldn't be allowed to do this. KN shared that there is a lot of scrutiny around plastic. The Agency is setting up a task force on plastic. The crushing of plastic shouldn't happen and we should do what we can to prevent it. This is not within the ethos of PAS. However, GK suggested that the producer should be able to demonstrate that they have met the requirement and we shouldn't necessarily stop them. He asked whether they could move the sampling point to sample before the processing takes place. REAL and the EA will discuss this following the meeting.

#### **e. Compostables**

REAL shared that they had sent a survey to all CCS participants to understand the issues producers experience with compostable products. REAL asked the Panel whether more should be done to encourage or support producers to accept and process compostable products. KN shared that there have been issues with non-certified compostable dog poo bags and there were issues experienced during the Olympic Games. There needs to be more political pressure applied on this issue.

#### **f. APHA/PAS 110 sampling**

One discussion took place at the BCS Operators' Forum regarding whether an operator was taking too many samples for ABPR and PAS 110 purposes. They were sampling for E. coli after pasteurisation, salmonella at the final point before storage, and the PAS 110 suite at the final point before storage. Salmonella test results from the APHA testing could be used to prove compliance with PAS 110 and thus double testing for Salmonella could potentially be avoided as long as samples are taken from the PAS compliant sampling point. The certification body would need to be informed to avoid any complications at the time when conformance is assessed. The E.coli sampling point on the other hand does not seem to comply with the requirements of the PAS (clause 10) so as it stands; results from samples taken here shouldn't be used for PAS compliance.

## 6. PAS 100 revision update

REAL shared the summary of changes. GK asked whether we will be publicising the review in any way. It will be important for outsiders looking in that we can have confidence in the new standard. It has been revised but we haven't changed too much so we can be confident in what we have. REAL will send out a press release on the extensive consultation and positive outcome. REAL will list the issues that had been discussed but not taken forward for the next review of the standard. REAL also shared that we will set up a workshop for BCS operators (maybe the next BCS Forum) to ask whether they think revision is necessary and if so, what they would like to see revised.

## 7. Research Hub

JS provided an update on the development of the Research Hub. The governance details had been developed with JS explaining that a Research Hub Board would oversee the funds and a Research Panel would oversee the governance of the Hub and the Terms of Reference. There will be a relationship between the Panel, the TAC, and scheme stakeholders.

To prioritise and select issues, the Research Panel will liaise with stakeholders to produce a list of potential projects. This list will be shared with certified producers who will identify projects. The projects will then be decided on by the Research Panel. Producers can vote on projects but the Review Panel will make the final decisions. We will take into account the imbalance between BCS and CCS funds. It was suggested that we could communicate joint projects beneficial for both.

TAC members asked whether non-certified producers could contribute to the funds. JS informed that if they do then the reports will be available to them as 'Hub Associates'. JS informed that it will likely be more desktop research than anything else. However, there might be opportunities for further funding and the Hub could contribute funds to projects. They are unlikely to be lab based/field based but there could be avenues for additional funding. It was suggested that we could approach universities, such as Cranfield/York, as they do a lot of waste-related work. We could maybe access PHD grant/students to include in the process. The process will be shared soon.

## Close

## Summary of Key Actions

- REAL to consider hosting SQCS/HACCP workshop(s) for CBs and inspectors at NSF
- DR to check what the mentioned company does for microbial activity testing
- RL to discuss digestate product complaint with KN for further investigation
- REAL and appointed laboratories to discuss RBP testing issue
- NSF to consider visiting the field on which the contaminated compost was spread last year
- REAL to invite Soil Association to become member of TAC/Oversight Panel
- REAL to consider sharing photos from product complaints at meetings
- REAL to discuss PRT failures with labs and corrective actions with CBs
- DP to circulate spreading module from BAS scheme
- BCS to consider putting ideas of waste types forward to EA in future
- REAL and EA to discuss sampling point when crushing digestate
- REAL to send out press release on consultation and positive outcome of PAS 100 revision