



CCS and BCS Technical Advisory Committee

Tuesday 30th March 2021

Teleconference

Chair: Stephen Nortcliff

Attendees:

Georgia Phetmanh	REAL
Molly Rogers	REAL
Thomas Aspray	REAL
Jo Chapman	BCS Operators' Representative
Gregor Keenan	CCS Producers' Representative
Roy Lawford	OF&G
Sophie Arguile	NSF
Nicholas Johnn	ACL
Sarah Pitcher	Laboratories' Representative
Alison McKinnie	ZWS
Janet Gascoigne	UKAS
Fiona Donaldson	SEPA

1. Update from REAL

Scheme status

MR reported that on the CCS there are 179 certified processes: 141 processes in England, 6 in Northern Ireland, 19 in Scotland, and 13 in Wales. A total of 3.8 million tonnes of feedstock is processed on an annual basis and 2 million tonnes of *quality compost* is produced on an annual basis.

On the BCS, there are 96 certified plants: 69 in England, 8 in Northern Ireland, 11 in Scotland, and 8 in Wales. There are approximately 5 million tonnes of throughput materials processed annually.

Since 1st January 2021 on the CCS there have been 4 applicants, 0 suspended, and 6 withdrawn certificates. On the BCS there has been 1 applicant, 0 suspended, and 0 withdrawn certificates.

Workshops & webinars

MR reported that since the last TAC, REAL have run another sampling webinar for producers. Producers are encouraged to attend the free webinars which are 45 – 60 mins long, as they provide a platform for discussion. They have been well-received. Feedback is given following the webinars – there is an opportunity for producers to offer further suggestions for improvement (using the feedback form). The webinars have been valuable in improving engagement between producers and REAL, in addition to the fora held twice a year. REAL contacts producers who have given lower feedback and suggestions on how to improve webinars can then be given.

REAL have also run another 'understanding test results' webinar since the last TAC meeting, where there were 15 attendees. The webinar delivers information on the core PAS 100 test methods. By gaining a better understanding of the methods, and how they are executed in the laboratories, REAL hopes this will help producers better interpret results they receive.

Covid-19/audits

GP provided the group with an update on the Covid auditing agreement with the Environmental Regulators. The previous agreement was extended until 31st January 2021, and before this date, another meeting took place in which REAL provided an update to the regulators.

The regulators were assured that the remote audits continued to work well and there were no local intelligence issues reported to them. The EA's position applies until 31st May (to align with the QP review funding deadline) and the other three regulators' positions until 31st July.

These agreements may be withdrawn sooner but have been communicated to all participants and any updates will be communicated as soon as they are decided. GK noted that he had two audits and was impressed with the way that they were carried out.

Scheme Rules

REAL finalised the revision of the CCS and BCS Scheme Rules at the end of February – the new versions were published on 1st March. The audit checklists are being updated as a result of this and operators will be audited against these from 1st May, after a two-month transition period.

GP reported that the legal review took longer than anticipated and discussions with the regulators on the 'QA' category have not concluded. Therefore, the key changes to this version of the rules include the temporary removal of the QA category, however, there is an aim to re-implement this certification category into the BCS rules next year.

Why Not? Project

MR gave an update on the Why Not? Project that REAL undertook in 2020. This was a marketing project to ascertain why compost and AD sites that may be eligible to join CCS and BCS are not certified under the schemes. This project also aimed to promote the schemes by contacting sites directly and gauging interest from sites regarding certification.

Sites were emailed and phoned using contact information on publicly available registers. The lists of sites were supplied to REAL by the regulators. It was extremely time-consuming to obtain site contact details (telephone numbers and email addresses) in all four countries and there was little return. Most searches returned information on Companies House but no email or phone number for the site. Although, a few sites in Northern Ireland were reached by phone and the conversations were useful, as we received some feedback on why these sites were not certified.

MR asked the TAC for advice and suggestions on how we could contact sites.

SN commented that he attempted to find sites that might be interested in composting and was not surprised that REAL struggled to find sites as his search returned little results also. AM asked GK if he was aware of any sites that should be certified but are not. GK noted that smaller sites would have waste exemptions. It may be the case that unless a producer thinks it is too expensive with exemptions and deployments, they would not look for an alternative option. SA commented that she had a conversation with a site where they did not think PAS 100 was feasible based on the cost of certification, and for this reason they were not certified.

ACTION: REAL to consider suggestions and ideas from TAC for the Why Not? Project

PT tender

REAL ran a tender for the development and delivery of a PT programme. The two organisations that submitted expressions of interest did not submit full tender proposals but informed they would be interested in working with REAL to develop this programme (outside of a formal tender process). GP noted that REAL will seek advice from the TAC later in the meeting on this.

2. Update from the Certification Bodies

OF&G

RL reported of one new CCS complaint from a member of the public to an EA officer who contacted OF&G about plastic contaminants in a field. OF&G plan to hold a spot inspection for this complaint. The other complaints that were open have been signed off.

ACL

NJ reported that ACL had not received any new complaints.

NSF

SA reported of one open complaint around the level of plastic contamination in a product sold through a third party. NSF need to assess if the compost was blended before it was sold on.

FD missed the last TAC meeting where discussion took place around the availability of auditors. She questioned if the CBs were back up to a full roster of auditors. RL noted that OF&G have 2 auditors in training, NJ reported that ACL have their ordinary audit team available, and SL commented that NSF are coping well and that the full team is operational.

3. Update from the Approved Laboratories

SP reported that the laboratories are operating smoothly and are running as normal. Couriers are not guaranteeing service, but they are operating at normal levels of service.

The paperwork coming into the lab is generally satisfactory, the odd sample volume is not quite enough, but there were no major issues to report to the TAC.

4. Update on the MDWG

Since the TAC in October, there have been two teleconferences of the MDWG. During the first teleconference, the group discussed and considered whether to restrict the focus to the QP reviews, or to identify other workstreams outside of this. GP reported that there were no immediate market-related issues or concerns to address and other ideas for market development were explored.

The group agreed that engaging with the growing media industry would be a suitable workstream, however, we need to consider what promotion of certified compost or engagement may mean. For example, do we introduce the scheme requirements to the growing media sector or promote specific PAS-certified products. The group also discussed how the AD industry could learn from the water industry to take material to land that reflects its value.

Following the call, the QP review outcomes were published and the joint industry QP workshop took place in January. After the workshop, a second teleconference took place and how the group could contribute to the QP's was considered. The use of compost for animal bedding was discussed and evidence collected for the development of this market in Scotland. The group also considered a list of market-related suggestions for digestate, which were put forward by a certified AD operator.

Following the second teleconference, the MDWG submitted a research proposal to the Research Hub for clear marketing material for producers to sell into horticulture and gardening markets. This proposal is due to be reviewed by the Research Panel and the Group is awaiting the outcome of this.

5. Update on the PRT TWG

The second meeting of the PRT TWG was held on 10th February. REAL had carried out data analysis looking at PRT failures recorded in the database from 2020 and presented this analysis to the group. The analysis found that there were no failures in the weed element or abnormality in the tomato plants, which is associated with plant residues. The group was encouraged by these results.

The analysis also found that there was a 2.5% failure rate for germination and 4% failure rate on top growth. These failure rates were deemed low by the group and it was agreed that the problem might not be as widespread as originally thought.

TA reported that there are a few producers where these were repeat failures. There was a preconception that there may be a high number of failures between IVCs, but the failures were evenly split. There was also a preconception that there are more failures in winter, but the results showed that failures occurred at all times during the year.

It was discussed that the PRT is a screening test, which replaces the need for many chemical tests, but the group discussed what a producer must do if they fail this test. There are a number of issues around the length of the test, with producers not knowing which appropriate corrective actions to take.

Discussions around failures and the possibility of using chemical tests, which would enable release to restricted markets, led to a conclusion that more information about organic contaminants of concern was needed. An action from the second meeting was to put forward a research proposal to the Research Hub. SN reported that himself and TA had a call to discuss this proposal further.

ACTION: EA and SEPA to provide comments to REAL about PRT TWG research project proposal

6. Technical issues

Hub and Satellite

TA noted that discussions at the last TAC meeting surrounding concerns with sampling and testing requirements of Hub and Satellite models was taken away for further consideration.

As it stands, Hub and Satellite models are considered under the Scheme as a single process. This view was previously upheld by AFOR. It has been decided that although there might be an option to sample material from all satellite sites, this cannot currently be enforced due to the existing requirements of PAS 100, and Hub and Satellite sites should be seen as a single process.

TA has updated the EA officer who flagged this issue, and they are understanding with this position. REAL have made a note to look at this issue during the next PAS review/revision process.

PT programme

The PT tender has now concluded (in February 2021) and REAL are considering internally what the next steps are. There has been an internal meeting since the tender period concluded – REAL considered looking at each parameter individually. REAL also sought comments from the Approved Laboratories on this during a recent liaison meeting.

REAL sought advice from the TAC on whether it is important to introduce a PT scheme for specific scheme test parameters and if so, which on either or both schemes this should be developed for.

GK suggested that physical contaminants that do not have a recognised accredited benchmark, such as UKAS, should be assessed. Members of the TAC agreed that it would be beneficial to monitor the laboratories outside of the annual audits. TA added that having a PT programme helps to tighten the

schemes, improve performance in a transparent way, and moves away from situations where operators give feedback that the labs are not performing as they should.

JG noted that laboratories accredited to ISO 17025 are required to take part in PT schemes. This ensures that all producers get consistent results. TA added that all laboratories approved under the schemes are involved in PT schemes, but not for scheme-specific tests, which would be beneficial.

The group considered if there was another stability marker that could be used in place of the RBP test. JC has submitted a proposal to the Hub on this test and SN noted that he has spent a lot of time looking for alternatives. KN commented that DEFRA have some money to look into this. It may be worth approaching them to raise the issue and assess whether there would be a way of working with them.

ACTION: REAL to consider views from TAC on PT schemes for scheme-specific tests

ACTION: KN to provide REAL with contacts for BEIS and Defra to consider approaching them re the RBP test

7. AOB

GP informed the TAC that REAL sent a letter to the EA regarding the QP reviews, outlining the amount REAL is willing in principle to contribute. Though before committing formally, there are a number of areas where REAL would like to gain further clarity. This letter was sent to the EA last month and REAL are currently waiting to hear back. REAL are also aware that the trade bodies are gathering funding pledges and can report that their efforts have been positive thus far.

An issue surrounding compost supply was raised, whereby compost was sold through a third party and there was a complaint about the product sold by this third-party company. It was not known whether the PAS compost was mixed before it was sold on. TAC members agreed that control over the material is lost once it is sold and it has left the site. Traceability becomes difficult and there is no trail to follow once a complaint has been raised and sold through a third party. KN noted that this should be discussed with REAL and subsequently at the next TAC meeting.

ACTION: REAL and EA to discuss third-party compost supplier issue at annual liaison meeting

ACTION: REAL to add third-party compost supplier issue to next meeting agenda

End

Actions:

- REAL to consider suggestions and ideas from TAC for the Why Not? Project
- EA and SEPA to provide comments to REAL about PRT TWG research project proposal
- REAL to consider views from TAC on PT schemes for scheme-specific tests
- KN to provide REAL with contacts for BEIS and Defra to consider approaching them re the RBP test
- REAL and EA to discuss third-party compost supplier issue at annual liaison meeting
- REAL to add third-party compost supplier issue to next meeting agenda