



Compost Certification Scheme Producers' Forum

Minutes for meeting on 4th May 2022

Hybrid: Online and The Trinity Centre, 24 Cambridge Science Park, Milton Road, Cambridge, CB4 0FN

Attendees:

Justyna Staff (JS)	REAL
Georgia Phetmanh (GP)	REAL
Emma Laws (EL)	REAL
Megan Muller Girard (MMG)	REAL Research Hub
Will Stevens (WS)	REAL
Gregor Keenan (GK)	CCS Producers' Representative
Mick Wheatley (MW)	Waste Wise
Georgina Smith (GS)	Hope Farm
Phillip Gray (PG)	Gray Composting Services Ltd
Agnes Starnawska (AS)	Veolia
Emma Cheetham (EC)	Willen Biogas
Shelley Stimpson (SS)	New Earth Solutions
Richard Lynas (RL)	Suez
Jason Ruffell (JR)	Suez

Welcome and introductions

GP welcomed the group and initiated a roundtable introduction to the meeting, explaining that REAL have found and liaised with a potential new chair, but they informed last week they are no longer available today. They will hopefully be chairing the autumn meeting.

GP then outlined the programme for the day and asked if anyone had any other issues they would like to raise to be discussed later. No attendees had anything to raise.

Previous meeting minutes

There were no questions or comments on the minutes from the last meeting.

Updates on the CCS

Actions from the last meeting

REAL to advise new scheme participants to mark scheme update emails as 'safe' so they don't divert to junk

EL informed the group that this has been/will continue to be actioned.

REAL to continue circulating scheme development summary papers in advance of forum meetings

GP confirmed this will continue to be done for the forums and TAC.

REAL to consider suggestions from producers on increasing attendance at forum meetings

These suggestions have been considered; one change is that REAL will use a hybrid approach going forward and will ensure timings allow for school runs for those joining virtually. REAL are also in the process of upgrading the website to include an events section, which should make it easier for people to keep track of when forums are happening. Additionally, REAL have worked on the comms used to announce the forum, including using quotes from regular attendees and, following feedback from the participants survey, encouraging smaller sites to join.

GP asked attendees if the timing of this meeting was convenient/appropriate. All attendees agreed.

REAL to record comments from producers on changes to PAS 100 in relation to stones and E. coli
Actioned.

REAL to consider feedback from producers on encouraging more people to complete RH [voting on projects] surveys

MMG reported that the Hub is moving towards the next round of project selection, typically a survey is issued for producers, but engagement is traditionally low. The Hub has therefore made some changes: the Hub has produced a single page summary doc of proposals and are introducing a workshop with Stephen Nortcliff on 19th May to go through proposals, as the Hub had received feedback that people did not understand the projects.

REAL to consider feedback from producers on the CMCS labelling guidance and certification marks

Producers commented at the last forum that CMCS certification marks need to be more easily distinguishable between home and industrial, e.g., with a change in colour. REAL agree this is a good idea and are working on this, but due to the trademarks process this will take time.

Any questions on the Summary Paper

There were no questions, and all attendees agreed the level of detail was appropriate.

Update on the CQP revision, EU FPR, and RPS 241

Compost Quality Protocol

The EA has set up Task and Finish groups for all the QPs being revised. The CQP T&FG is comprised of representatives from Defra, environmental regulators, trade bodies, REAL, CIWM and NFU. The first meeting took place in December 2021.

Once the scope for revising the CQP is agreed, the EA will produce an estimate of how much they think it will cost to work through the whole process. This will then be provided to industry for agreement. Defra has informed they will contribute funding of £5000 for each QP revision.

Once the costs are agreed, the EA will start to work through all the issues that they agree within the scoping meeting. The T&FG will commission work to enable the revision process to progress. Commissioned work will then be technically assessed by EA technical specialists.

Once all work is complete, the T&FG will produce a technical report on the viability of the new resources framework and the decision will be made by the EA on that viability. The report then goes to be ratified by the EA management chain and then goes through sign off by the EA Content Cloud, which is the process for publishing onto gov.uk.

GP then outlined the key technical issues/areas for revision raised by the EA, REAL, and the trade bodies:

EA

- Updating risk assessments
- Looking at physical contaminants like plastics, stones, and sharps

REAL

- Compost comparator – we had been informed at a previous TAC meeting that this was peat, but this is now being looked into
- Different quality requirements for different markets
- ISO 17065 – reference needs to be updated to this standard within the new Resources Framework and requirements need to be auditable for UKAS accreditation
- PAS 100 and PAS 110 revision timescale – QP revision needs to take into account the time it will take to revise the relevant PAS, and the process used by BSI
- Test method reviews and updates
- Definition of compost or ‘composted material’ / oversize

Trade bodies

- Additional waste types for Appendix B
- Compostable packaging i.e., for non-packaging material
- Additional markets

JS emphasised that the EA's position is notably different from in previous years, they previously were set on the comparator for compost being peat, and that they would not accept different criteria for different markets.

AS asked if REAL knew what the new comparator will be?

JS said that this is being investigated internally by the EA, and that she believes it is likely that research into potential comparators will be needed, there may not be just one comparator, or it could just be a series of requirements that need to be met.

JS then gave a further explanation of the EA's comments on oversize: oversize will likely not be included in the new resources framework as it would make the scope too wide. The resources framework will probably focus on compost and a different framework would need to be introduced for "composted materials" including oversize.

AS commented that the timescale for this will cause problems for producers, the CQP revision has been/is a long process so the time needed for a new composted materials framework would create challenges.

MW expressed that oversize is a significant issue for all sites and excluding it will create more paperwork/cost/work, as it will have to be under a second composted materials scheme.

GK commented that, in order to include oversize in the scheme, it would need to meet the criteria of mulch or soil improver. GK added that concentration of plastic or other contaminants could make this challenging for some.

MW queried if oversize would therefore be excluded from feedstocks?

JS clarified that reusing oversize from your own process is unlikely to be a problem, it is only if you want to use oversize as a product elsewhere.

JS then asked how producers currently use/deal with oversize.

Most feed it back into the process but a minority use it as biomass.

GB FPR

The EA identified in the high-level review that the QP and the PAS could be valid standards in the FPR and there is a need to take into account the fertiliser product regulations in the revision process.

DEFRA is going to be putting forward a proposed modified version of the fertiliser regulations but are currently a long way from getting a firm position out for the consultation.

The EA feel quite strongly that the QP + PAS is still the better option and the standard that's set is implanted in the domestic agreement for the fertiliser regulations.

JS added that DEFRA are aiming to publish a consultation at the end of the year, other than that, we don't have a timeline, but it will be a long process.

RPS 241

The EA published a new regulatory position statement in 2021 which they had consulted on earlier in the year.

RPS 241 allows producers to accept wastes with codes that are not in their waste authorisations or the QPs, instead of the not otherwise specified '99' waste codes. It also allows producers to accept wastes with different codes and descriptions to those in the QPs.

The RPS applies until the relevant waste authorisations and QPs are amended or the RPS is withdrawn. A number of wastes have been re-coded. If the original code specified in the QP is on the site permit, certified producers can accept the waste under the new code, but if the original code is not on the site permit, they are unable to accept the waste.

For producers, we have been advised that they will need to change the codes in waste returns. There will be an administrative cost associated and the paperwork will need to be correct but otherwise there are no other changes that need to be implemented.

Implementation under the schemes – we have drafted a technical guidance document for producers and the CBs with a table displaying the current QP permissible lists of wastes and the new waste codes in the RPS, confirming that producers can only accept wastes under the new codes if the original codes are on their site permits. We are discussing this with the EA.

Feedback from the last Technical Advisory Committee

GK gave the following updates from the last TAC meetings in November and March: Firstly, the labs confirmed that producers can request another test if they experience a PTE failure for an unknown reason, to try and identify the problem. The results from this 're-test' will not be acceptable as part of CCS certification but can be done for research/development.

GK raised producers' comments on the need for *E. coli* testing at the November TAC meeting – environmental regulators and farm assurance schemes responded that the test is important as an indicator of a successful sanitisation phase, it is important for public and stakeholder confidence, and safety. At the time, the EA also commented on peat as the compost comparator and there not being *E. coli* in peat, while this position has changed GK noted that the new comparator is unlikely to be e.g., manure, so the *E. coli* test is likely to remain.

This then opened some discussion into potential comparators:

Soil was suggested as it is used for growing, and can be exposed to *E. coli* and stones, similarly to compost. However, it is not biologically active/is too variable. JS suggested that quality criteria for soil could be solution. GK added that manure would be an obvious comparator for agriculture as it is used for the same purpose but felt the EA would be unlikely to agree to that due to e.g., manure's instability. JS concluded this discussion by suggesting that research into comparators could be suggested at the next Research Panel meeting.

- **Action:** REAL to consider discussing evidence gathering for the compost comparator in the context of the CQP revision at the Research Hub's Research Panel meeting
- **Action:** Producers to share any further ideas with REAL on a compost comparator

GK continued with the TAC updates, explaining the frozen compost sample discussion presented in March. The requirements state that compost should be cool when transported but the TAC agreed this did not allow for samples to be frozen before transit.

Finally, GK raised the transit times issue that producers had experienced, and the clarification note REAL produced for labs. All attendees felt this had been helpful. Some attendees were still having some issue with couriers.

Updates on the Research Hub

Previous Project Updates

Research Library (First Project)

The library collates research on composting and AD and is regularly updated with new articles (www.realresearchlibrary.org.uk).

130 composting-related articles cover five areas:

- Associated Emissions
- Compost Quality and Application
- Feedstock and Pre-treatment
- Process Design and Control
- Process Optimisation

Digestate Data Pack & Valorisation Report (Second Project)

This BCS-specific project was completed in December 2021. The reports are available upon request and have been picked up by regulators.

To request access to project outputs, please email megan@realschemes.org.uk.

Ongoing Project Updates

RBP Project (Fourth Project)

This BCS-specific project seeks to explore improvements and alternatives to the Residual Biogas Potential test.

Aqua Enviro was appointed as the contractor and commenced work in late April.

PRT Project (Third Project)

Background: this CCS-specific project sought to investigate contaminants and phytotoxins in 'End of Waste' composting feedstocks and finished composts to determine the causes of rising PRT failures. It also sought to develop a suite of tests as an alternative for compost used for land-spreading (rather than horticulture end market).

Issue: Following a 6-week tender period, the project did not receive any bids.

Action(s): REAL is revising the original project proposal according to feedback presented at the TAC. This revised proposal may be considered for re-tendering. REAL has also issued a call for stakeholder feedback in Feb – Mar. This feedback is currently under review and will inform our decision making.

We aim to make a decision on the PRT project by end of May 2022.

Project Selection Updates

Four proposal submissions received:

1. *Development of approach(es) to compare the performance of BCS/CCS approved laboratories for scheme specific test methods*
2. *Extract and analyse REAL data on physical contaminants in composts and digestates to help inform new limits in future revisions of PAS 100 and PAS 110*
3. *How the benefits of applying compost and digestate to soils can be accounted for under the Greenhouse Gas (GHG) protocol*
4. *Mixing & tank capacity assessments*

Industry Feedback (Survey & Webinar)

The feedback survey was open from 9th May – 20th May. This was accompanied by brief project summaries and took 5-10 minutes to complete. A webinar is taking place in the afternoon of

- Thursday 19th May to present proposals & answer questions, hoping to increase traditionally low engagement.

We aim to make a final project selection by August.

EC asked where the Tender Invitation documents were published.

MMG responded that they are published as a new item on the Hub website, go out on social media and are circulated to the Hub's stakeholder network which MMG has been working on expanding.

AS asked if this included universities, HTA or other growing organisations.

MMG responded that universities had been approached but there was not much interest.

EL added that in her recent attempts to engage with the GMA/HTA, she had not had much success. AS commented that she could pass on her contacts, greater engagement between CCS and GMA/HTA would be beneficial.

- **Action:** REAL to aim to join GMA or HTA meetings through liaison with AS

JS suggested that it could be in part a timing issue, the TID was sent out in September 2021.

GK added that some feedback had been that the brief was too broad, and it could have been split into two projects.

MMG concluded that the brief is being revised internally, the Research Hub will be considering a new PRT proposal as well as feedback on the original proposal.

- **Action:** Producers to share any further feedback with REAL on the lack of bids for the PRT research project

Issues raised with CCS Producers' Representative

GK reported that producers were mostly raising concerns over the move to white diesel, which while not CCS related is a considerable challenge.

Additionally, GK commented on the increasing prices of chemical fertilisers and the opportunity this presents. However, as the benefits of compost are not so immediate (2-3 years), a marketing push may be necessary to convince farmers of the benefits of using certified compost.

- **Action:** REAL/REAL MDWG to consider promoting and persuading farmers to recognise the benefits of using certified compost in place of manufactured fertilisers now rather than ignoring due to slow release

Finally, producers had raised with GK that the level of contamination that producers are forced to accept in Local Authority contracts when bidding is too high, and GK queried if there was any pressure that could be put on LAs.

All attendees agreed that LA contracts were an issue, that the plastic contamination coming in looks excessive but is still only 1% of the load, but it creates a real challenge for producers to remove this plastic.

GS commented that the EA had said it was up to producers to work with LAs, but this doesn't work as producers cannot pressure LAs to put lower contamination in contracts.

GP agreed this is an important issue, and that it would be taken to the TAC, the EA will be attending the TAC and GP believes they are doing some work in this area.

An opportunity to discuss other issues raised by producers

EC had one question on the cost estimate previously provided by the EA of £25,000 – will it likely be more, will producers have to contribute more, how much has already been contributed?

GP answered that the £25,000 was an estimate but depends on what industry want to be included. REAL will respond to this in greater detail by email after speaking to colleagues.

The REA received the pledges from members, so they would have to be contacted for the second question.

- **Action:** REAL to query if QP revision could cost more than previously estimated and seek to find out how many operators pledged funds

EC additionally asked other producers what EWC code they are using for compost leachate. RL commented that this was in RPS 241. GP responded that this will be within the RPS 241 guidance that REAL will issue as soon as the EA have confirmed the information is correct.

- **Action:** REAL to circulate RPS 241 guidance once confirmed and agreed with the EA, including new EWC for compost leachate

Identifying certified compostable materials

GP brought attention to REAL's labelling guidance document, which was designed for everyone (primarily manufacturers of compostable end/finished products, the organics recycling industry, and policy makers). It currently includes the CMCS marks, some tips for identifying certified compostable products, other certification marks/logos, information on where to verify producer's claims, and information about REAL's CMCS.

GP asked if any producers had seen this guidance or had any comments on it.

MW asked more broadly about CMCS, how the labels would be policed/checked as in his experience lots of compostable products do not compost.

GP responded that for CMCS, REAL will be policing the use of their own marks.

There was mixed response to compostables in general with some composters commenting that they disintegrate but do not fully break down, and others finding no issue with the compostables they take.

MW commented that cert marks would need to be repeated all over the product to be visible in the feedstock.

AS added that the product as a whole needs to be certified, not just the materials it is made from.

GP asked if colouring compostables brown to avoid the perception problem if any plastic remains at the end would be beneficial. This had been suggested by a CB at the recent roundtable meeting.

Producers commented that while this would be good for perception when on land, it would still fail the PAS 100 plastic limit so wouldn't truly make a difference (test does not differentiate between conventional and compostable). If anything, the hidden plastic idea would likely reduce consumer confidence.

Any other issues or topics to raise

EL asked if anyone had ideas of stakeholders to reach to. All responded that they will follow up by email if they have any ideas.

- **Action:** Producers to consider other stakeholders REAL should engage with and send ideas to REAL

GP asked if anyone would be willing to share the price of their compost. PG commented all his is used on his farm, but he has cut back hugely on inorganic fertiliser and used almost entirely compost, hoping to see this save money.

Other producers said that they would potentially email GP this information.

Finally, GP asked for feedback on the hybrid approach; all agreed it had worked well.

- **Action:** Producers to provide REAL with feedback on hybrid approach to forum meetings

Actions

- REAL to consider discussing evidence gathering for the compost comparator in the context of the CQP revision at the Research Hub's Research Panel meeting
- Producers to share any further ideas with REAL on a compost comparator
- Producers to share any further feedback with REAL on the lack of bids for the PRT research project
- REAL to aim to join GMA or HTA meetings through liaison with AS
- REAL/REAL MDWG to consider promoting and persuading farmers to recognise the benefits of using certified compost in place of manufactured fertilisers now rather than ignoring due to slow release
- REAL to query if QP revision could cost more than previously estimated and seek to find out how many operators pledged funds
- REAL to circulate RPS 241 guidance once confirmed and agreed with the EA, including new EWC for compost leachate
- Producers to consider other stakeholders REAL should engage with and send ideas to REAL
- Producers to provide REAL with feedback on hybrid approach to forum meetings