

CCS Producers Forum Minutes

4th October 2022 (Online)

Attendees

Jane Hall	Chair
Georgia Phetmanh	REAL
Emma Laws	REAL
Megan Muller-Girard	REAL (Research Hub)
Gregor Keenan	CCS Producers' Representative
Jo Fitzpatrick	Material Change
Emma Cheetham	Willen Biogas
Malcolm Marshall	Veolia
Shelley Stimson	New Earth Solutions
Phil Gray	Grays Composting
Georgina Smith	Hope Farm

Welcome and Introductions

GP welcomed everyone to the forum then introduced Jane Hall, the new chair of the CCS and BCS Forums. JH gave a brief overview of her work at the EA, consultancy around permitting, work with CIWM, and delivering training courses. GP then initiated a roundtable of introductions, ran through the programme for the day, and outlined the role of the forum.

Previous Meeting Minutes

All accepted the minutes.

Updates on the CCS

Actions from the previous meeting

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

At the Research Panel Meeting, REAL did not specifically raise the issue of evidence gathering for a compost comparator. However, REAL did present all options available for utilising Hub funds to gather evidence to support the QP revisions. This included the option to postpone commissioning any new projects until the EA disclosed what evidence would be beneficial for the QP revision.

Producers to share any further ideas with REAL on a compost comparator

No further suggestions were received.

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

REAL received no additional feedback.

REAL to aim to join GMA or HTA meetings through liaison with AS

AS is no longer in her role at Veolia, so this was not possible. However, REAL has met with the Responsible Sourcing Scheme for Growing Media (RSS), which is run by the HTA/GMA, and will be looking to work further with these new contacts in future.

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

The MDWG have not met since the last producer's forum, REAL are currently considering restructuring this group and reviewing the Terms of Reference. However, this action will be considered further when work resumes.

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

All attendees of the previous forum received a response to this by email after the forum. Further updates on the QP will be given later in the meeting.

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

This guidance has now been published; the guidance includes this information and is available [here](#).

Producers to consider other stakeholders REAL should engage with and send ideas to REAL

REAL received no further suggestions but are continuing to work on expanding the list of stakeholders as an ongoing project.

Producers to provide REAL with feedback on hybrid approach to forum meetings

No additional feedback, other than that from during the meeting, was received. However, this meeting was planned to be hybrid and due to low sign-up for in-person attendance has been held wholly online. This will be discussed further later in the meeting.

Any Questions on the Summary Paper

There were no questions on the paper. The summary paper sent to all attendees prior to the forum can be viewed [here](#).

Update on the CQP Revision

GP delivered the following update on progress of the CQP revision. The first meeting of the Task and Finish Group to discuss the revision of the CQP (and ADQP) took place on 5th September. The scope of the revision and evidence available to date were considered by the group, with the focus on risk assessment. Further meetings will be arranged in due course to discuss matters in greater detail.

REAL are collaborating and working with the EA and will be publishing a paper on plastics, as evidence for the revision. A summary of this work will be available on the CCS website.

GK queried if the data in this project is on failure rate or on the level of plastics in certified compost? EL confirmed that it contains information on both, focussing on England only, it gives failure rate by e.g., feedstock type and then also details the levels of plastic in certified compost.

JH asked if the scope goes as far as looking into where the plastics within certified compost came from. EL responded that it did not, this was beyond the scope of what was possible for REAL to do internally with the data held.

Feedback from the last Technical Advisory Committee

GK gave an overview of the last TAC meeting. Firstly, GK summarised the discussions on plastic contamination and the 5% level in local authority (LA) contracts. GK shared with the TAC images of 2% contamination in an incoming load at his site, to put into perspective for all in attendance the pressure that producers are under when it comes to contamination. GK shared his view that 1% contamination should be the maximum.

GK also informed that he had taken producers' queries on *E. coli* to the TAC again. It was reiterated that the *E. coli* test is an indication of a successful sanitisation phase, this was especially important to Red Tractor, whose representative commented that as compost is used on vegetables that aren't being cooked (e.g., lettuce), testing for *E. coli* is important and not something they would be supportive of seeing changed. The test is always likely to be part of the PAS 100.

GK also raised at the TAC the importance of training and how beneficial the PAS 100 training course run by the REA had been. Producers' varying experiences of compostables, as discussed in the May 2022 forum, were also relayed to the TAC.

REAL gave the TAC an update on the issue related to PTE testing which had been raised at previous forum and TAC meetings, and the current monitoring for any further issues at the labs. The issue was first raised at the CCS forum, as the lab(s) had misreported high PTE values to the producer, but it

wasn't clear if other PTE results had been misreported due to the same error. In response to this, REAL considered a process for being alerted to testing-related issues at the labs (from either the labs or producers). REAL identified no requirement in the T&Cs for labs to report issues directly to REAL. This was added to the T&Cs during the most recent revision; these T&Cs were consulted on and finally issued effective from January 22. REAL are also currently discussing with the CBs typical/acceptable corrective actions for PTE failures.

JH then opened to the floor for questions on this TAC update from GK.

JF asked if contamination levels raised by GK were by weight or by volume. GK confirmed it was by weight.

EC raised that having transitioned to the new 21/22 permit, sites she works with have been unsuccessful in LA tenders as they were not accepting 5% contamination (their permit only allows for them to accept 1%). It feels like it is an uneven playing ground.

GK agreed that this is a key issue and raised his concern that it is sites with the lowest standard which get the business. The EA need to put pressure on LAs to put 5% in tenders/contracts.

JH asked if the 1% applies to all sites, as it was her understanding that the regulation 61 letters only apply to larger sites.

EC confirmed that in her experience the regulation 61 letters have gone to bespoke sites also and that the 1% is an absolute rule in standard rules 2021 number 2.

JH raised that she thinks it doesn't apply to some sites which fall under waste operations category, the appropriate measures are slightly different. JH shared a link laying out appropriate measures ([available here](#)).

JF noted that she works with both operations and installations sites and the 1% applies to both.

GK returned to the discussion on not receiving LA contracts and asked EC if she questioned the decision with the LA in question.

EC confirmed that she had, but they would not back down and that she will be attending the LARAC conference this week and so will be sure to raise it there.

JF suggested that she double checks whether the LA was referring to by weight or by volume, as in her experience 5% by volume is less than 1% by weight, so if they've said by volume in the tender, 1% by weight might be ok.

AOB

As the meeting was running ahead of schedule, JH suggested we cover some of the AOB points before the lunch break.

JH asked for attendees' views on in person meetings, hybrid meetings and online meetings.

JF raised that online is useful as it allows for her to get more done in the day.

JH suggested a vote, the majority voted for online in future. JH suggested that we go online in future but for something controversial or ad hoc we can do face to face. GP agreed with this approach.

Action: REAL to hold all regular biannual producers' forum meetings online going forward

Updates on the Research Hub

Completed Projects

Research Library, MMG gave the update that 107 articles added since launch (Jan 2021). 136 composting-related articles across five topics: Associated Emissions, Compost Quality and Application, Feedstock and Pre-treatment, Process Design and Control, and Process Optimisation

MMG also reminded the attendees that while not CCS related, the Digestate Data Pack & Valorisation Report was completed in December 2021 and is available on request.

Current Projects

A BCS related project on Evaluating Potential Improvements & Alternatives to the RBP Test is currently underway, this project seeks to explore improvements and alternatives to the Residual Biogas Potential test. Aqua Enviro was appointed as the contractor and commenced work in April 2022. The work is projected to be completed in April 2023.

Future Projects

In Summer 2022, the Hub decided to fund three new research projects:

1. Plant Response Test Interpretation and Comparison: Investigating performance of the PAS-Specified Tomato Plant Response Test and Spring Barley Test on Quality Compost (CCS-specific)
2. Evaluate possible alternative area-based methods of assessment for plastics (CCS and BCS)
3. How the benefits of applying compost and digestate to soils can be accounted for under the Greenhouse Gas (GHG) Protocol (CCS and BCS)

Tender period to commence in Autumn 2022. Projects expected to commence in early 2023.

Project selection process

The Call for Proposals opens in January and runs for approx. 6 weeks. Support is available for developing research ideas from Stephen Nortcliff, Advisor to REAL Research Hub, (s.nortcliff@reading.ac.uk). The Hub is also considering a workshop to brainstorm and develop ideas if producers would find this helpful.

REAL considered running a webinar to present proposals and answer any questions prior to the survey; this was held for the last selection period, and while attendance was low, feedback was positive.

A survey is then held for CCS and BCS Participants to express their preference. The survey is accompanied by brief project summaries and only takes 5-10 minutes to complete.

More info can be found in the Hub's 'How it Works' paper ([here](#)).

MMG then asked if there were any questions.

JH asked for more information on what projects are funded by the hub, if it includes desk based or if it is lab only.

MMG responded that both have been done in the past and more info can be found on the [scope page of the hub website](#).

Action: Producers to consider any issues they would like addressed through future research project ideas and consider discussing the ideas with Stephen Nortcliff, Advisor to the Research Hub

Issues raised with CCS Producers' Representative

No issues had been raised with GK.

An opportunity to discuss other issues raised by producers

JF had one query to raise on the recent Scheme Rules consultation. The draft scheme rules sent out for consultation included that the certification mark had to be on the main face of the bag; JF had ~1 million bags printed last year, so was concerned about having to have more printed following the new rules coming into place.

GP responded that REAL will be reviewing all consultation comments shortly, so couldn't give a definite answer yet, as certain Scheme Rules proposals will need to be discussed with TAC first. However, GP did confirm that there will be a transition period for all changes introduced.

Action: REAL to consider JF's comments on the proposed requirement for displaying the CCS conformity mark on the front of the bag only, during the evaluation period of Scheme Rules consultation comments

Any other issues or topics to raise

EL raised that in the recent participants survey, REAL had asked for feedback or ideas on any potential webinar topics or topics for written guidance which REAL could develop and could be useful for existing producers. As well as any topics which would help applicants.

There were no suggestions of new topics, however, JF suggested that for the Understanding PAS 100 Testing Webinar it may be useful see what the sample goes through once it has arrived in the labs.

Action: REAL to consider feedback from producers on potential webinar topics

EL also asked if anyone would volunteer for future blog posts/articles on our website, and for any idea of topics. GK said he was happy to be contacted.

PG suggested that best practice/operation at others' sites would always be of interest. All agreed best practice would be interesting.

GS commented that hearing that others are going through similar issues is reassuring, but GK noted that we should always assume anyone could be reading it, so must be mindful.

JH asked if plastics contamination would be useful as a blog post. GK agreed that this is something we need to highlight but need to not alarm stakeholders.

JH asked if something about permitting would be of use.

GK suggested the need for ensuring a site is certified PAS 100 for recycling targets. EC noted this could be something included in the QP revision process.

Action: REAL to consider feedback from producers on future blog posts/articles for the website

GP noted that the last two meetings have finished half an hour early and asked if producers would be happy with us reducing the length of meetings in future. All agreed. GP also commented that it may be useful if REAL share AOB questions in advance of meetings to allow producers more time to think on these topics prior to the meetings. All agreed.

Action: REAL to add AOB questions to the agenda if possible and reduce meetings by half an hour

Actions

- REAL to hold all regular biannual producers' forum meetings online going forward
- Producers to consider any issues they would like addressed through future research project ideas and consider discussing the ideas with Stephen Nortcliff, Advisor to the Research Hub
- REAL to consider JF's comments on the proposed requirement for displaying the CCS conformity mark on the front of the bag only, during the evaluation period of Scheme Rules consultation comments
- REAL to consider feedback from producers on potential webinar topics
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- REAL to add AOB questions to the agenda if possible and reduce meetings by half an hour