



Compost Certification Scheme Producers' Forum

Minutes for the meeting on 13th October 2021

Online

Attendees:

Gaynor Hartnell	Chair
Georgia Phetmanh	REAL
Emma Laws	REAL
Gregor Keenan	CCS Producers' Representative
Stephen Nortcliff	Research Hub Advisor
Mick Wheatley	Waste Wise
Georgina Smith	Hope farm
Jo Fitzpatrick	Material Change
Emma Cheetham	MEC Recycling
Phillip Gray	Gray Composting Services Ltd

1. Welcome and Introductions

GH welcomed the group and initiated a roundtable introduction to the meeting.

GH announced this was her last time chairing the meeting, asked for suggestions of someone to step into the role and that they should contact GP with these. GP explained REAL is looking for people to chair both the forums and MDWG preferably with some experience in AD and composting but explained that anyone with close ties to sites on the scheme is potentially a challenge for impartiality.

GH was thanked for her time as chair.

GH then explained changes in the format of the meeting; the scheme updates were sent out before rather than delivered during the forum, to allow for a focus on discussion.

2. Previous meeting minutes

All attendees were happy with the minutes of the previous meeting.

3. Updates on the CCS

3. a) Actions from the last meeting

GP provided updates on actions from the previous meeting (May 2021):

REAL to send draft survey for departing scheme participants to Gregor for comments

GP explained that this was done following the last forum, and the survey was finalised after GK's comments. The survey means that REAL is now collecting information directly from producers in addition to the Certification Bodies (CBs) re why they have left the scheme. No responses have been received yet, but the survey is being sent out monthly to any producers that have left the schemes.

REAL to consider logistics of holding back-to-back meetings with the REA before deciding on format of future producer forum meetings and consider on-site meetings/site tours

GP informed that this has been considered and discussed internally, but given forums are being conducted online at the moment it has been put on hold. Discussions will be continued next year for when meetings will be held in person again.

REAL to ensure Approved Laboratories are aware of guidance to producers re courier selection

This was discussed at a quarterly liaison meeting with Approved Laboratories. An information sheet has been produced for lab customer service. This contains details from producer sampling guidance and will ensure that the labs have up to date information about sample timing guidance/rules.

REAL to consider a process for being alerted to testing-related issues at the laboratories (from either the laboratories or producers)

GP informed it had been agreed internally that testing-related issue alerts should come from the labs directly. REAL have been informed in these instances and it rarely seems to be an issue, but it is not currently a requirement in the lab T&Cs. The T&Cs are currently undergoing revision and a requirement to report to REAL issues resulting in incorrectly reported results has been added. The draft of the updated T&Cs has been circulated to the labs and CBs for consultation.

EC had received an error report on which REAL may have been cc'd, suggesting labs may have already taken this on board. GH commented that this was good as it shows that it is not difficult for labs to make sure REAL are informed of testing-related issues.

REAL to check whether the Environment Agency could introduce new testing requirements/additional tests in revised QP

GP explained that this has been raised by colleagues who are involved in the QP revision discussions with the EA, but the EA have not yet detailed the ways in which the CQP is insufficient, so it is not currently clear if there will be new or additional tests included in the Resources Framework. GP also highlighted that it is not yet clear if the EA will require revision to PAS 100 before the Resources Framework is published. This is something the Task and Finish Group (T&FG) will consider.

GP then gave a more general update on the status of the QP revision process: REAL have agreed with EA the terms & conditions for QP revision and it has been confirmed that REAL will be on the T&FG. The first two meetings of the T&FG have not yet been scheduled.

REAL to investigate why Research Hub emails are diverting to junk folders

GP explained this is likely due to recipients' email systems sending the mail to junk folders as mass mailouts. This has been investigated with the mailing system provider and colleagues at REAL and the REA, it is unfortunately a common issue. The private twitter account is used to notify when emails are sent out, and new scheme participants will be advised to follow this and to mark relevant REAL email addresses as "not junk".

Action: REAL to advise new scheme participants to mark scheme update emails as 'safe' so they don't divert to junk and to follow private Twitter account

REAL MDWG to consider how to improve marking/labelling on products (containing PAS 100-certified compost) bagged by third-party suppliers

GP confirmed that this action is ongoing as the MDWG have not met since the last producers' forum. The next MDWG meeting is likely to be in February due to uncertainty over the QP revision and delays to the Defra consultation on the implementation of the EU FPR. GP also gave a general update on the MDWG and informed the forum that REAL is aiming to streamline MDWG work with the REA's digestate working group, looking to collaborate.

With regard to the PRT TWG, the PRT TWG's research proposal was selected for funding and prioritised over the other project chosen for funding this year. The PRT TWG are looking to meet soon to discuss other issues, such as peat supply.

REAL to circulate TAC meeting minutes to producers

The last TAC minutes will now be sent out routinely in advance of the forum meeting.

REAL to consider asking producers to review the CMCS labelling guidance

Covered later on the agenda.

GK and GH to discuss GK's concerns over producers' / scheme participants' ability to achieve changes they want to see in the scheme

GH explained that she and GK had a call with colleagues at REAL that was constructive.

GK detailed that the problem as he saw it was that REAL had a clear framework for complaints, but there was not an obvious procedure for changing the scheme. This call helped to clarify that process: any problems or issues that the producers have with PAS 100 can be raised in the forum and these issues will be taken to the TAC. From there, if the majority sentiment is that a change is needed, research to gather evidence can be done through submitting research proposals to the Hub.

The PRT research that the Hub is tendering for is a good example of this process. GK commented that it may be a long process, but he can now see how producers can seek to make changes: the EA are the ultimate arbiters and providing robust evidence on the need for change is essential. GK also added that the forum is a good tool for keeping pressure and momentum on change. GK agreed that for him the call bought to light the challenges with updating PAS 100 in that certain technical changes must be approved by the EA, as without agreement from the EA it is a futile exercise.

REAL to consider adding note in cost comparison document to inform that the associated costs of litter picking have not been included in the calculations

The 2020 cost comparison document has been amended to include this note in the supplementary section, and it has been renamed “fee comparison” to reflect that only required fees and charges are included as opposed to wider costs.

3. b) Scheme developments summary paper

GH asked if anyone had any questions that they would like to raise about the summary paper containing scheme updates that had been sent out in advance of the meeting. None were raised. GH also asked if everyone agreed that circulating the summary paper was preferable to covering the updates during meeting. All agreed.

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

4. Feedback from the last TAC

GK gave an overview of the issues raised in the last TAC meeting. Firstly, it was raised in the last TAC that SN attending the CCS and BCS forums would be useful, as SN will be able to provide clarity and advise on the process of submitting research proposals to the Research Hub, as many producers have ideas but are too busy or unsure about the proposals to put them forward.

GK noted that the EA and SEPA had provided useful comments on the PRT TWG research project proposal as was included in the actions from the last TAC, and that this project had been selected for funding.

GK also summarised discussion around workshops and webinars in the TAC. There will be another SQCS workshop happening in December and the sampling webinar is being held soon.

There was a discussion on the importance of keeping SQCS and HACCP training up to date, and the benefits of refresher courses. It was noted that different auditors can have different approaches making it very important that operators understand how to ensure compliance.

GK then detailed the issue of third parties selling compost marked with the PAS100 certification mark. GK explained that producers need to be mindful when selling on their compost as ‘PAS 100’ can only be on the bag if the third party bagging the compost, for example, are part of the audit system. Therefore, producers need to have a clear conversation with any third parties buying and bagging up their compost to make sure they are not making claims about certification. GK explained further that the issue isn’t what they sell it as but that third parties assume they can buy it and put PAS 100 on it. These third parties should be able to sell it, but they cannot claim conformity to PAS as they have not been audited to make sure the compost isn’t mixed with anything. Most of the time this comes up in terms of bagged products; and it can be a grey area, but ultimately once it has left the producer’s site it goes beyond the responsibility of the producer.

GH queried if perhaps producers should have guidance that they give out to these third parties explaining how the compost can be used so as to maintain its certified status. EC suggested that supply agreements do contain this, but it is still a grey area. GK felt that giving out guidance as to how third parties should use their compost could confuse the line of where the responsibility of the producer ends and that the focus should be instead on making this end of responsibility clear. GK added that if bagging plants wanted the certification mark to go on the bag, they would have to be part of the producer's audit, it would be very complicated.

PG raised that the importance of the PAS mark depends on the intended end user. A home gardener would not necessarily be concerned over whether or not they had a certified product, but it would be an issue for farms. GK emphasised that when there is a complaint, in most cases it shouldn't go back to the compost producer, but producers do need to be aware of the potential of being the subject of complaints if they sell to a third party. PG asked if GK gives third parties any declaration stating that responsibility over quality of the compost ends once it is sold. GK confirmed that he did not, but that he did ask what the compost will be used for.

GH commented that potentially by asking what the intended use is might involve you in what they do with it. GK agreed that this has happened in the past, but that it is important to make sure the compost buyer is purchasing the appropriate compost for their intended use. For example, GK once had a complaint after a buyer spread 0-40mm grade compost as a top dressing then proceeded to complain that it contained sticks. The product was certified but not for that use, as such there is some need for producers to make an effort to check buyers are using compost for its intended use.

GK then summarised that discussion over issues with couriers transporting samples had been taken to the TAC. Several agreed that getting samples to the lab in a timely manner was very challenging.

GK then moved on to discuss the PTE tests. GK suggested that it would be beneficial for producers to be able to pay for a second test if they had a PTE failure, one that uses a different sample, as it could just be one fragment of metal in that sample they took from the whole bag. GP explained that this had been discussed and it will be presented at the next TAC. GK expressed that even though a retest would not impact on certification, i.e., it would not override the previous failed test, he would like to do it anyway to know more information. He also added this would be useful for detecting a false negative, as the samples used in testing are a very small percentage of the compost produced, and producers would like to know with more certainty if their compost is high in PTEs or not and if producers are willing to pay more for more tests and information, they should be able to do so.

Finally, GK raised the issues producers have experienced with compostable packaging. Producers have suggested that the logo on compostable packaging is often too small. GK asked if anyone accepted compostable packaging at their sites. Only PG did and he agreed that what was and wasn't compostable was not always clear. GK added that this is a problem for the people at their facilities picking out the litter from their input, some compostable takeaway food packaging is indistinguishable from plastic, it all needs to be coloured in a certain shade or have large logos on it,

as otherwise it will all be removed from the input just to be safe. Zero Waste Scotland agreed at the TAC to look into this issue further.

5. Issues raised with CCS Producers' Representative

GK reported that he had not received any new issues, most producers continue to ask about PRT failures and how long this will take to be addressed.

EC noted that she had recently sent some information through to REA to help with the QP review and that she was pleased to see the return of in-person audits.

GK then brought up issues with communications, such as scheme and research hub updates. GP informed the group that REAL tweet scheme updates from private twitter accounts and have recently tweeted hub updates, but the private twitters are not well followed. JF raised a potential issue in that she had unsubscribed from one email as she was getting duplicates, being a participant of both CCS and BCS, but then found that she received no emails at all, she had seemingly unsubscribed from all emails. GP confirmed that she would look into this issue.

GK then moved on to open discussion as to how REAL could get more people to attend the forums, querying if remote meetings make it easier for people and so more producers are likely to attend. EC put forward, however, that some producers will prefer face to face meetings as it is a more concrete obligation in the diary, and producers get to leave work for the day and join the meeting. GS also expressed that the timing of the meeting is important, that having it run over school run times would exclude a proportion of producers. PG suggested that maybe there should be some reward for attendance, for example a discount on membership, to encourage farmers to attend.

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

6. Updates on the Research Hub and discussion on submitting proposals

6. a) General update on Hub activities

GH welcomed SN to the meeting, explaining that he would be delivering updates on the Research Hub and would be answering questions on the process of submitting proposals to the Hub.

SN introduced himself and his involvement with REAL and the Research Hub; that he chairs the CCS Technical Advisory Committee but also has been involved in the last two years in aiding development of research project proposals. SN began by detailing the aims of the Hub: to address and investigate problems in order to maintain the robustness of the compost and AD industries as well as seeking innovation and solutions to commonly faced issues.

SN then delivered updates on the projects that have already been selected for funding:

- 2019 – The Research Library – This has been completed and is a valuable resource that all CCS and BCS participants have access to.

- 2020 – Digestate data pack – AD has a diversity of outputs, this project seeks to assess the properties, characteristics, and content of digestate that will provide context for the development of new uses. This project is due for completion by the end of the year.
- 2021 – SN explained that two projects had been selected this year. The first being focussed on the PRT. This project arose from the PRT TWG as producers were experiencing unknown failures and felt that the test was not as relevant for those producing compost to be used as a soil conditioner. The project had been prioritised over the second selected project and was out for tender. The second project selected in 2021 was AD related and seeks to investigate if there is an alternative or if any improvements can be made in the RBP test's standard procedure.

SN then suggested to attendees that they read through the Research Hub's annual report, as this may help to germinate an idea for a future project.

6. b) Overview of the Hub selection process

SN explained the process involved in project selection. He reviews the proposals, looks at areas of overlap and summarises them for consideration by the panel. Industry feedback is sought via a survey, which has historically has not had much engagement. Following industry input, the panel shortlists the proposals taking into account the evaluation criteria.

SN then set out the five evaluation criteria that are used to assess proposals, and their importance in considerations (percentage of consideration given in brackets) these are:

1. Maintain the robustness of CCS and BCS and their associated standards – SN explained that ensuring quality outputs is therefore a priority as one set of adverse comments could be damaging, especially as some parts of the media are against the recycling industry and so will pick up on any negatives (20%).
2. Support development of appropriate standards – For example do testing methods need updating or changing (30%)
3. Maintain confidence in markets (20%)
4. Support growth of markets (10%)
5. Identify barriers (20%)

SN offered to assist participants in developing project ideas and give advice on how they could be worked up into project proposals. This proposal also was well-received.

6. c) Open discussion

EC asked if the Hub would be able to prioritise or fast track any research projects that would be needed for QP revision, or would it have to go through the same process described by SN earlier. SN responded that if there was any urgent research area that came up during the QP revision this might become a priority area. The involvement of REAL in the revision process may mean that the Hub has some advance warning or can predict if any urgent research points will arise in the revision process. GK suggested that while the process may be long in normal circumstances to ensure it is a fair

process to select projects for funding, this should be less of an issue if urgent research is needed for the QP revision, as there will be overwhelming industry support for that project to go through.

GH asked SN about the PRT project selected for funding in 2021; querying how much scope there was for considering alternative tests. SN clarified that he hadn't looked over the full brief that had gone out for tender, but as failures are a big issue, he believed there had been discussion over using different plants depending on the end use of the compost. SN added that in his view there will always be some form of PRT included in the PAS, as the environmental regulators view this as of importance, but potentially there will be different interpretations of results depending on the intended end use of the compost.

SN described three topics that repeatedly appear to be a problem or an area for debate: PRT, RBP and stones. Given that two of these have already been selected for research, stones could be something that is taken forward for research if a proposal is submitted. Producers agreed that stone content would be a good topic, as it is felt that the restrictions are currently inappropriate for compost for use in agriculture, where the addition of stones can be beneficial. Producers would favour a requirement to report on stone content, allowing the customer to decide on whether the compost was suitable for them. One producer suggested that limits could take a market-based approach, varying depending on the end market.

GK acknowledged that restrictions are useful for environmental regulators to ensure compost producers aren't mixing other non-biodegradable waste into their windrows. EC commented that stones were in the green waste input and were not due to a purposeful import of rubble or non-biodegradable waste.

JF then raised that similarly E. coli is an issue as the restrictions on it are so strict compared to the lack of restrictions for farmers spreading manure onto their land. SN agreed, commenting that he had previously conducted research into E. coli. He reported that in this research they had seen that if there were lots of seagulls in the area then the levels of E. coli would be high, and this, while, completely out of the farmer's control would result in a failure of the E. coli test and as such investigating the rationale for those limits could be useful for the industry. GK suggested pigeons could also present problems if they gain access to compost storage areas. EC favoured different E coli levels for different compost markets.

JF noted that she did not always respond to surveys and that the main reason for this is not having time to do so due to workload. JF felt that without the time to read through the full details of each proposal it is hard to make an informed decision, she suggested that a short, summary description of each proposal being included in the survey would be useful for those with limited time. EC raised that she found that webinars with the REA where there is voting throughout were useful, as responses are gathered while topics are still fresh in people's minds, EC suggested that a meeting in which proposals are explained before the vote would be useful. Also maybe limiting the time people have to complete the survey to a 24-hour window would increase response as there would be added

urgency. SN agreed that a session presenting the shortlisted proposals to scheme participants could be useful, an hour to go through the projects and then holding a vote could be a good idea.

GH thanked SN for his time and for agreeing to discuss ideas with producers before formal proposals are submitted in January.

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

Action: REAL to consider all feedback from producers on potential options to encourage more people to complete RH surveys

7. An opportunity to discuss other issues raised by producers

All issues raised had been covered on the agenda.

8. Any other issues or topics to raise

GP reminded producers to schedule their renewal audits as soon as is possible. The CBs have reported that audits are being scheduled just before renewal, which leaves little time to address non-conformances and potentially leads to withdrawal from the scheme.

GP then asked for feedback on the CMCS labelling guidance document that REAL are developing. GP explained that the aim of the guidance is to encourage consistent labelling across the UK market, to provide tips on identifying certified products, to provide information on other certification marks, and to give details on joining CMCS. GP also added that REAL is meeting with UCL who are conducting research into compostable packaging.

Producers suggested that the CMCS marks are too similar, that they shouldn't be the same colour or should have a bigger difference, as the public would have to look very closely to notice the difference between home and industrially compostable products.

GK then suggested that the guidance could include where physically on the product to check for certification, as for example on a sandwich box that has a plastic window, needs to be clear where to see if both the box and the window are compostable, the guidance should include how people should look at this and what is expected.

GP clarified that PAS 100 requires a compostable product is only acceptable as an input if independently certified as industrially compostable, therefore a certified home compostable product is only acceptable as an input if it is also industrially compostable. The key difference in standard requirements is that to pass the industrial compostability biodegradation test, the product must biodegrade within 6 months at a higher temperature, whereas to pass the home compostability biodegradation test, the product must biodegrade within 12 months at a lower temperature (approximately double the timeframe at approximately half the temperature).

GK then advised producers to be prepared to present a logical explanation to auditors, in response to how they deal with test failures. He had enquired and been told that auditors do not work to a particular framework of acceptable corrective actions.

GH then thanked all for their attendance. Attendees all reiterated their earlier messages of thanks to GH for her time as forum Chair.

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

END

ACTIONS:

- **REAL to advise new scheme participants to mark scheme update emails as 'safe' so they don't divert to junk**
- **REAL to continue circulating scheme development summary papers in advance of forum meetings**
- **REAL to consider suggestions from producers on increasing attendance at forum meetings**
- **REAL to record comments from producers on changes to PAS 100 in relation to stones and E. coli**
- **REAL to consider feedback from producers on encouraging more people to complete RH surveys**
- **REAL to consider feedback from producers on the CMCS labelling guidance and certification marks**