



## Market Development Working Group

### Minutes

Wednesday 5<sup>th</sup> May 2021

Online

**Chair:** Anna Becvar (AB)

**Attendees:** Georgia Phetmanh (GP), Justyna Staff (JS), Molly Rogers (MR), Jenny Grant (JG), Gregor Keenan (GK), Tom Brown (TB)

Apologies: Alison McKinnie (AMcK),

Item	Action complete:
<b>1. Welcome</b>	
<b>2. Actions from Previous Meeting</b>  a. <u>Actions:</u> <ul style="list-style-type: none"><li><i>JG to consider the production of central database for QP reviews with other organisations.</i></li></ul> <p>This is on the list to be done. Once the reviews are in the stage of collecting information, there will be a central database.</p> <ul style="list-style-type: none"><li><i>GP to discuss the possibility of fast-tracking research projects with the Hub Manager.</i></li><li><i>GP to query whether REAL considered seeking votes from operators on spending Hub funds on QP revisions.</i></li></ul> <p>GP discussed these action points with the RH manager who informed her that there is no process for this now. It may be possible to remove certain phases of the selection process and is something that could be explored further.</p> <ul style="list-style-type: none"><li><i>AB to submit a research project proposal on marketing materials (for compost use in growing media/benefits of digestate) before 19th February.</i></li></ul>	

<p>AB submitted a proposal to the Hub. The MDWG was asked for more information which was not expected, but SN was provided with the necessary information at that stage. The group were waiting for the outcome of the panel evaluation meeting.</p> <ul style="list-style-type: none"> <li>• <i>GP to check the Research Library for any research on compost use for animal bedding.</i></li> </ul> <p>MR could not find any research relating to this topic on the RH library.</p> <ul style="list-style-type: none"> <li>• <i>TB to research the use of digestate as a flea beetle deterrent.</i></li> </ul> <p>TB noted that there was not a lot of information in the way of academic studies on this topic. He found one study conducted by the Royal Agricultural Society and was seeking information on whether it could be used for the research library. TB informed the group he would update them on this action when he had more information.</p>	
<p><b>3. Updates from REAL</b></p> <ul style="list-style-type: none"> <li>• <u>QP Update</u></li> </ul> <p>JS provided an update on the QP reviews. The EA published their QP review outcome in December and the REA and REAL held a workshop in January on this. The EA informed industry that they would have to pay for the revision process. They have confirmed that the existing QP will remain in force until the end of May and will not be withdrawn, as they have received enough money to fund the revision process.</p> <p>JS informed the group that there was a suggestion that the EU fertiliser regulations would replace the use of the QP's once they come into force. It may not be necessary to revise the QP's if the EU fertiliser regulations are adopted. The situation will apply to the whole of England and SEPA's position statement will remain, where there is a market driven approach. There has been no further clarity from the DEFRA or the EA regarding this, which JG confirmed. JS noted that there are plans to consult on the fertiliser regulations in the summer with the view to introducing them next year.</p> <p>AB noted that from an industry perspective, it would be clearer if there was one set of rules to comply with, which would be the fertiliser regulations. JG confirmed that UK fertiliser regulations do not have to mirror those set out within the EU FPR. The transition period needs to be clear and set out for industry. Within the EU FPR, there would be a notifying body for conformity of assessment and there would be a requirement for ongoing testing.</p> <p>GK noted that the introduction of the EU fertiliser regulations would cause uncertainty for producers in England. There is enough time for comfort, but it would not make sense to review the QP and a year and a half later, the work would be redundant. There needs to be industry clarity from the EA on this.</p>	

<p>AB considered that the EU fertiliser regulations would give the AD industry flexibility with products, as producers would be able to sell their products in supermarkets. The fertiliser regulations would accelerate development of digestate and there would be huge advantages to adopting these new regulations. With compost, this would be a soil improver and may present a few challenges. There is a limitation for compost sites adopting the EU FPR processing ABP's, as this is not permitted under the EU FPR and should be flagged with DEFRA. There are additional requirements in the fertiliser regulations that are not in the PAS's. The plastic and PC limits would need to be tightened if we were to adopt the EU FPR. It would be interesting to map a comparison between the PAS requirements and those in the EU FPR. JG noted that EN (REA) was in the process of doing this.</p> <p>JG commented that the REA were reluctant to let industry know about the EU FPR route, as there are so many unanswered questions at this stage.</p> <ul style="list-style-type: none"> <li>• <u>RH Submission Update</u></li> </ul> <p>MR updated the group on the MDWG's submission to the Research Hub. As previously mentioned, AB submitted a proposal to the Hub. SN requested some more information from the group, which was provided by MR (background information on the project). The research panel were due to meet in May where projects would be shortlisted to be taken forward.</p> <ul style="list-style-type: none"> <li>• <u>Scheme Rules</u></li> </ul> <p>There was a consultation and revision process of the scheme rules in 2020. Following this, version 9 of the CCS rules and version 6 of the BCS rules were published in March, with a two-month transition period. REAL received a number of additional comments from UKAS on the CCS rules which they considered that needed to be looked at, in order to be suitable for accreditation purposes. There were some key changes to the rules including:</p> <ul style="list-style-type: none"> <li>○ Temporary removal of the QA certification category</li> <li>○ Reference to the EA's QP review outcome</li> <li>○ Display of certificate and contact details on the BCS website</li> </ul>	<p><b>Submitted but not accepted.</b></p>
<p><b>4. Animal Bedding</b></p> <ul style="list-style-type: none"> <li>• <i>GK to gather research/evidence/information on compost use for animal bedding in Scotland.</i></li> <li>• <i>GK to send animal bedding files to REAL.</i></li> <li>• <i>GP to produce accessible file sharing location for MDWG.</i></li> </ul>	

<p>GK collated the information he had on compost use for animal bedding in Scotland and sent this over to REAL. There was an animal welfare concern with straw in the winter and a possibility of using green compost. Additionally, there was information on whether garden waste was suitable for animal bedding. The QMS cattle and sheep standard contains guidance on what they should and should not use. DEFRA was consulted and SEPA pushed this with APHA to allow for this to be used.</p> <p>There was some feedback that this material was effective as animal bedding, and GK plans to explore with farmers on how effective it was when used. The reason that people know about compost is that they buy it and use it on land as well. There are a lot of farmers who like to see animals bedded in straw and compost.</p> <p>JG noted that she knew of some people that used this as a base layer to supplement the straw bedding as a lot of farmers are using grape straw. Farmers prefer to use wood chip as it is extremely absorbent, and then use compost, as it is covered in a T23 exemption.</p> <p>This would have to be covered in a separate end of waste when considering the EU fertiliser regulations. Operators can claim self waste of their product, but it is ultimately up to the EA's end of waste panel to decide on this, which is currently closed. JG considered that it would be useful to understand how wide the demand for this is before spending money on it on evidence to get it added to the QP. GK noted that in 2019 in winter there was not a massive demand for this. Although it has been approved for QMS, farmers consider that there is a lot of additional hassle.</p>	
<p><b>5. Requirement for additional markets for compost and digestate</b></p> <p>This topic was raised at the Green Gas Forum and there was discussion around new markets for both materials. Group members agreed that there needs to be clarity on the difference between the EU FPR and QP's for this discussion to go further. There will be no time or money wasted thus far and all evidence gathering and discussions will be beneficial if anything is to be adopted or changed in the EU fertiliser regulations. Consideration about how QP's can be changed will influence the scope of the EU fertiliser regulations, when they are adopted. If the fertiliser regulations are to be adopted and there is a consultation period, industry would not need to pay for this.</p> <p>JG noted that the REA were planning to get feedback from members and hold a workshop on additional markets, which she suggested could be held with REAL. Industry would expect to hear back from the EA by early</p>	<ul style="list-style-type: none"> <li>• REA to hold a joint meeting on the QP review outcomes. 9<sup>th</sup> CQP &amp; 10<sup>th</sup> ADQP June 2021.</li> </ul>

<p>June, but it is expected that the QP process will continue regardless of the fertiliser regulations, for the time being.</p> <p>JG confirmed that the REA workshops would be taking place on the 9<sup>th</sup> and 10<sup>th</sup> June online.</p> <p>JG confirmed that the EA have said that they will issue a statement to say that they have the funding, and that the revision process has started.</p>	
<p><b>6. Outstanding issues from previous meetings</b></p> <p><u>b) Composting Oversize</u></p> <p>Composting oversize has been raised previously and the possibility of adding this back to the agenda was discussed, due to the biomass market for oversize. The EA's end of waste panel is closed so they will not engage with this topic.</p> <p>The group considered that biomass to England needs a separate resource framework for oversize which would result in a new position.</p> <p>This topic should be kept on the MDWG's agenda and raised towards the end of the year. The EA should be reminded that there is potentially a need for a separate discussion around this.</p> <p><u>c) Approach for engagement in the Growing Media Sector</u></p> <p>MR gave an overview of a product complaint from a member of the public regarding a growing media product containing PAS 100-certified compost, and plastic contamination. The product is described as 'Organic Peat-Free Compost'. We are not yet sure if the product is comprised of PAS compost and other materials or just PAS compost. The complainant has used it as a growing media product, but it may not be suitable for this application. There are issues here related to traceability, the supply chain, fitness for purpose, and the use of compost in the growing media sector.</p> <p>JG reported of similar complaints. It is considered that these situations are beyond the control of the composter and the Schemes, even with a third party in the supply chain. Producers have no control over what is done with the material once it has been sold.</p> <p>There should be clarity in the definition and labelling of the materials.</p> <p>When a multipack is bought, there is a label which indicates the product must not be sold separately. There should be a label on compost of a</p>	<ul style="list-style-type: none"> <li>• JS/JG to contact the Environment Agency regarding compost oversize.</li> <li>• REAL to add composting oversize to the MDWG agenda later in 2021.</li> <li>• REAL to draft a statement to insert on compost contract of supply documents specifying it is supplied for the intended use agreed with the purchaser and agree this statement with the MDWG.</li> </ul>

<p>similar vein, which specifically states that is not to be repackaged and sold and that the product was intended for its specified end use.</p> <p>If the compost has been used incorrectly and is supplied as a soil improver, there is a misunderstanding and misuse of growing media.</p> <p>Minimising the risk of compost being used incorrectly is the best option for producers.</p> <p>The growing media association could be contacted to discuss this issue from a market perspective.</p>	
<p><b>7. Farm Assurance Schemes</b></p> <p>There is a difference between Scotland/ QMS with England, and REAL sought to discuss how there can be clarity with farm assurance schemes and discuss why there is such a big difference in the standards. It would be beneficial recognise the distinction between certified and not certified farm assurance Scheme, as REAL do not liaise with stakeholders from these groups. Mapping out requirements for different schemes would be a useful exercise, and would also provide another layer of distinction and information in regard to the EU fertiliser regulations.</p> <p>SQC released an article damming of PAS digestate and GK reported that he spoke to a composter who supplies barley for malting about this. The composter had been in the industry for years and the conversation was useful.</p> <p>The use of recycled materials should be encouraged across the board and farm assurance schemes should be aligned with the work the REAL promotes. It would be best to start with the FSA.</p>	<ul style="list-style-type: none"> <li>• JS/MR to map out the different requirements of the Farm Assurance schemes within a spreadsheet to identify differences in approach between schemes. WRAP and Zero Waste Scotland to be contacted for contacts as they may have a list from previous projects.</li> <li>• REAL to consider inviting David Thompkins to the next MDWG meeting to discuss farm assurance schemes.</li> </ul>
<p><b>8. AOB</b></p> <p>AB made the MDWG aware that the EA flagged that microplastics from roadsides should be focused on within a recent research project. There is an Intereg Ggrassification project and as part of this, the EA sent a report on microplastics in roadside verges and how they contribute to water and land environments. Tyre wear fragments and microplastics from</p>	<ul style="list-style-type: none"> <li>• MR to draft a proposal to put forward to the Research Hub in the next round of submissions on microplastics and</li> </ul>

<p>road markings as well as discarded rubbish enter surface waters from road runoff (thought to contribute 40% of microplastics in the aquatic environment).. The project is currently reviewing whether cut and collected roadside vegetation are suitable to be treated by composting or within AD because there of contaminant Levels.</p> <p>The group considered that a Research Hub proposal could be useful to explore this further, where samples from typical compost and digestate would be tested for microplastics. The methodology for this has already been looked at, so this might be a case of extra samples of material being sent to the lab. It would be useful to get a ballpark figure to see how much this project would cost. The current method costs approximately £300 per sample to look at this.</p> <p>There is opportunity here for mass gathering of samples, where the laboratory could take a bottle of every compost sample and send it to the university for testing. Permission from operators would need to be granted, which might raise concerns that this project would be contributing to a conversation which might scuppet the industry.</p> <p>This should be put forward into a proposal for the research hub for the next round of submissions.</p>	<p>circulate it to the MDWG for comments.</p> <ul style="list-style-type: none"> <li>• MR to arrange a date for the next teleconference in June.</li> </ul>
<p><b>Meeting close</b></p>	