



Summary Notes from the first meeting of the Market Development Working Group

Wednesday 26th June, 12.00 – 15.30, Eversheds, Leeds

1. Welcome and introduction of agenda

2. Actions from the last meeting

- a. Actions covered at the beginning of the meeting related to; the production of an organogram for the MDWG, finalising the MDWG ToR, pulling together a list of key stakeholders and contacts, circulating dates for the next meeting, and publicising notes from the first meeting.
- b. An organogram for the schemes was presented, which shows how REAL engages with the composting and AD industries, and the relationships between the committees/groups in place for REAL's CCS, BCS, and Research Hub. The diagram also shows the bodies that contribute to scheme development and industry development. The MDWG has a direct relationship with the CCS & BCS TAC (as a sub-group) and the BCS Operators'/CCS Producers' Forums. The organogram could be developed further to include other organisations and committees/group working to develop the composting/AD industries.
- c. The MDWG ToR had been finalised and published on the CCS and BCS websites. The ToR detail the relationship between the MDWG and Research Hub.
- d. A list of potential key stakeholders for the MDWG had been compiled, including the environmental regulators and various farm/crop assurance schemes. Where there were gaps in contact information, members filled these in and offered to seek relevant contacts. It was noted that engaging with the assurance schemes' auditors/inspectors is key.
- e. The minutes had been circulated to all MDWG members for comment and the actions had been recorded. A public-facing version had been devised as summary notes for the websites.

3. Review of the Quality Protocols

- a. The action from the first meeting that related to the upcoming reviews of the CQP and ADQP concerned making this the primary focus for discussion. This development was also discussed with operators at the recent Forum meetings.
- b. An update from the Environment Agency about the review of the CQP and ADQP was presented and discussed. There are three possible outcomes from a review; the QPs are reviewed and no change is made (regarded as an unlikely outcome), the QPs are reviewed and

the Agency decides they no longer support them, or the Agency decides they support them but an update is required. Any update to the QPs will have to be paid for by industry.

- c. MDWG members shared that the Agency may be carrying out a small-scale review, which will involve looking at the sewage strategy (and Biosolids Assurance Scheme) to learn from the wastewater industry. Farmers are currently paying for biosolids so it must have marketing value. The Agency may use existing methodology to carry out this gap analysis.
- d. MDWG members shared that the Agency may invite industry trade bodies to discuss and argue for the fundamental changes that should be considered for the reviews, and then the related charges that industry would be required to pay for an update. It was also agreed that the Agency will carry out an initial review before the main review process.
- e. The Agency is also carrying out a 'rapid assessment' for all organic materials spread to land. They are taking into consideration what is in the material, how to test for it, and what the associated risks are. MDWG members suggested we use this rapid risk assessment when considering new market sectors that could be considered for the Quality Protocols.
- f. Several operators with ideas for new markets were invited to the second meeting of the MDWG, however, they were unavailable that day. One operator would like to see amateur horticulture added to the list of market sectors in the ADQP for quality digestate and he has gathered evidence to show that there is demand from this market. MDWG members shared that previously, WRAP was not focussed on building an evidence base for the horticultural market, which is why it has not been included in the ADQP.
- g. REAL had received a few enquiries about the supply of digestate fibre to this market and the REA had also received several enquiries, particularly raised at the PAS training courses.
- h. MDWG members shared that industry can use the EoW portal online to answer questions about the suitability of organic material for these applications.
- i. A discussion took place around what type of horticulture should be considered e.g. field-grown horticulture or growing media. The ADQP already specifies soil or field-grown horticulture as a market sector. There are no market restrictions in Scotland, therefore, no regulatory barriers. There are no regulatory restrictions for the use of non-waste materials in horticulture in England, but there are for materials with waste status. A barrier to the addition of amateur horticulture to the ADQP for fibre could be alleged plastic contamination or concerns over / perception of plastic contamination, if plants are not de-packaging.
- j. Existing evidence to support the addition of this market was discussed. Some work has been carried out by WRAP, universities, and researchers/consultants, but more research may need to be done. It was suggested that we propose the Research Hub funds a relevant research project but considering the timescales for the QP reviews/Research Hub/research projects, it was thought to be too late to submit this proposal.
- k. The MDWG will issue a survey to all scheme participants to gather views from operators on market sectors (and waste inputs) they would like added to the QPs.

4. Feedback from the Forums

Feedback from the BCS Forum

- a. The BCS Operators' Representative provided an update from the BCS Forum. There were several comments raised relating to market development for digestate as follows:

- a. One operator would have liked to have seen more projects proposed relating to new market developments for digestate. The individual concerned had hoped that proposals might be generated by the MDWG.
- b. A question was raised about the sliding scale of physical contaminants for dried digestate. This material has been referred to the end of waste panel, but this issue has been noted for the PAS 110 review.
- c. There were several potential areas for development raised. These were; hydroponics, the use of digestate by a garden centre to produce plants that will be sold to the public, and dried pelleted material used as a fuel.
- b. MDWG members commented that there are a variety of different digestate products now, and it may be useful to look at the sewage matrix for AD. PAS 110 does not currently consider all the different product preparation procedures/processes used by operators. A drying step is not considered in the standard and therefore, the operator hoping to extend the sliding scale for fibre is not covered. There may also be an issue here regarding this material in storage dropping down in nitrogen levels and then not tested again for minimum quality. MDWG members commented that fibre should be tested as compost is under PAS 100, and the sliding scale should not consider loading the soil with plastic. The parameter limits should be volumetric like in PAS 100 – this should be considered during the review of PAS 110.
- c. The Representative also shared that there was a brief discussion about the barriers to digestate use in agriculture at the research panel meeting on 13th June. During that meeting it was suggested that producers could learn from the water industry.

Feedback from the CCS Forum

- a. The CCS Producers' Representative provided an update from the CCS Forum. The main topics of discussion related to markets revolved around meeting the new requirements of PAS 100 to check market/customer requirements, and the supply of oversize.
- b. Operators feel that PAS 100 is undermined by how the new requirements for producing fit-for-purpose compost are written in the standard. However, MDWG members advised that the requirements were included in the previous version. They are now more visible and are there to protect the producer. Although, operators view this as an added burden.
- c. At the Forum, operators proposed that markets for oversize are added to the CQP but were informed that this is unlikely to be possible as oversize is a different material. Research project proposals related to oversize were put forward to the Research Hub but were out of scope.
- d. REA had investigated oversize previously and will find out where the work sits now.
- e. Customers must determine if oversize is good enough quality in Scotland. Wood-compliant facilities are taking oversize as a 'waste' material and some operators are taking oversize from the front end for higher value.
- f. Another key message from the CCS Forum was that not enough work is being done on PAS promotion. Customers do not care about PAS, the branding, and the mark.
- g. MDWG members advised looking for charitable funds/green funds that could support this project or offsetting companies that could contribute to the funds.

5. Update on the Research Hub

- a. The actions from the first MDWG meeting related to the Research Hub were for the MDWG to propose that the Hub commissions a project on a research library and gap analysis. MDWG members also agreed to consider the putting forward ideas via the consultation.
- b. 35 project proposals were submitted in total, including the MDWG's proposal, and 13 were shortlisted by the Research Panel during the first meeting of the Panel.
- c. The 13 shortlisted proposals could be categorised under 'general' or 'test methods'.
- d. Operators at the Forums had commented that the outputs of each project proposal were not always clear. However, MDWG members informed that WRAP would invite contractors to propose the outputs for each project, and REAL has also considered this.
- e. The CCS Representative explained the reasoning behind the research project proposal to investigate 'what a PAS 100 compost product looks like?' Product complaints related to alleged plastic contamination sometimes result in an 'unfounded' complaint because the batch has passed the PAS 100 minimum quality tests (for plastic). We could consider looking at compost when it meets the limit or 0% contamination, for example.
- f. MDWG members commented that this is a great idea and informed that NFU did something similar, looking at waste/product material, and a tool called 'crap app' exists.
- g. Members commented that the test requirements and perception of quality do not add up.
- h. The research projects to be funded by the Hub will be decided at the next Panel meeting.

6. Quality Assurance Schemes

- a. The actions from the first MDWG meeting related to the REAL quality assurance schemes were for REAL to pull together NNFFC biogas/AD data, produce a note from the MDWG on the new certification categories, and approach NFU to introduce the MDWG and its aims.
- b. A breakdown of NNFFC data from May 2019 showed that approximately 220 AD/biogas plants were processing only manures/slurries and crops/crop residues. These plants may be producing digestate from waste, but this not regulated, providing the digestate is used as undigested manures/slurries would be used. These plants may join the BCS QAS.
- c. However, questions were raised at the BCS Forum around how accurate the feedstock data is and where it is sourced from. If the data is sourced from past planning information, it is unlikely to be realistic or up to date. REAL is setting up a meeting with NNFFC to discuss this.
- d. The note from the MDWG was circulated to the group with the intention to disseminate it to market organisations like NFUS the following week after final comments from the MDWG.

7. Organic Certification

- a. The actions from the first MDWG meeting related to organic certification were to contact Ben Raskin at the SA to identify who to engage with, provide relevant OF&G contact information to REAL, contact Nina Sweet to request assistance with contacting Defra, and meet with Defra to discuss the existing issues related to the supply of digestate/compost to organic land.
- b. A meeting is being set up between REAL and the Soil Association.
- c. MDWG members expressed interest in joining this meeting. The REA has been engaging with SOPA and noted that the issues related to digestate supply are complicated. There are concerns over source-segregated food waste derived-digestate.

8. Topsoil Manufacturing

- a. The actions from the first MDWG meeting related to topsoil manufacturing were to find out more about this market-related issue and to set up a meeting with a CCS operator and the Environment Agency to discuss this with the Agency directly.
- b. An initial discussion had taken place with the Agency, but they referred to the British Standard and the RPS. The Agency has not replied to correspondence since.
- c. This compost producer has been advised to seek an end-of-waste opinion.
- d. The British Standard for topsoil has limits for N, P, and K. PAS 100 compost will exceed these limits if blended. Operators are blending with soil at the same time. Sites are getting rid of waste compost by blending it with soil.
- e. RPS190 does not fit this scenario and it should be changed, it should become a LEP, or operators should seek an end-of-waste opinion.
- f. This is a national problem even though it has only been raised on a local scale.
- g. The RPS should be revised to cover what this operator is doing, or the Agency will need to consider another pathway.

9. Feedstock Quality

- a. The existing work on improving feedstock quality in the biowaste sector was summarised. Work is being undertaken by other groups and organisations e.g. the Quality Action Plan. The Research Hub may fund a research project with an objective of reducing plastics and physical contaminants in feedstock. The Environment Agency has set up a task force to focus on biowastes and plastics in soils and is putting together a position paper, which details several workstreams and initiatives.
- b. MDWG members agreed that a lot of work is being done in this area and this does not fall within the MDWG remit. Although, the Group could influence the Research Hub plastics project in relation to feedstock quality, when the time arises.
- c. The REA is managing a campaign with the target of zero plastics to land. The industry is working to improve feedstock quality, but it should be a top-down approach through government and local authorities working to reduce contamination.

10. AOB

- a. REA ORG is holding a sampling workshop with SEPA to discuss with operators in Scotland whether they are meeting the PC/plastic limits, and if they are not, whether the implementation deadlines should be postponed. Scottish government may be encouraged to produce more comms.
- b. REA ORG is also looking at collecting data on carbon sequestration in compost and what work is being done in countries elsewhere.

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