

CCS/BCS Technical Advisory Committee Minutes

9th November 2022 (Online)

Attendees

Stephen Nortcliff	Chair
Georgia Phetmanh	REAL
Emma Laws	REAL
Tom Aspray	REAL Technical Advisor
Gregor Keenan	CCS Producers' Representative
Jo Chapman	BCS Operators' Representative
Sarah Pitcher	NRM
Roy Lawford	OF&G
Sophie Arguile	NSF
Nick Johnn	ACL
Alison McKinnie	Zero Waste Scotland
Fiona Donaldson	SEPA

Welcome and Apologies

SN welcomed all attendees to the meeting.

SN explained that while this meeting was going to be held as a hybrid meeting, planned train strikes have meant some could not make it London so it is being held wholly online.

Minutes and Actions from the last Meeting

Previous Meeting Minutes

All attendees accepted the minutes from the June 2022 TAC meeting.

Actions

TAC and REAL to further consider how they might involve David Tompkins to ensure his considerable knowledge of WRAP activities is made accessible to the TAC.

REAL have discussed this internally and consider that it would not be relevant for a consultant to attend the meeting, considering the ToR for the TAC. However REAL consider that David Tompkins' knowledge can be made accessible to the TAC through working groups.

REAL to consider fast-tracking plastic-related research project if selected

Following the last TAC, the decision was made to divide the plastics proposal into two parts. The first part being the analysis of data REAL holds on plastics and the second being the investigation into the area-based method. The first part of this project has been conducted internally to allow this work to feed into the QP revisions. An update on the second part will be delivered later during the Hub update.

EA to consider sharing Gregor's video of plastic contamination with local authority representatives and discuss with trade bodies who is best to lead on reducing feedstock contamination

GP informed that KN was unable to attend today's meeting, so does not have a full update, however she believes that a meeting between the EA and trade bodies had occurred in which this was discussed.

GK to circulate video of feedstock at Keenan recycling with 2% plastic contamination

Actioned.

AMK queried where GK's most contaminated feedstocks come from. GK responded that most notably contamination is in feedstocks from kerbside collections, so the issue is both householders dumping things into the wrong bins, and the contamination not being picked up by bulking stations.

AMK asked if GK had any specific actions he wanted her to take forward regarding that video.

GK suggested that mainly he would like for the video to be used when contamination is discussed so that people maintain the perspective of what 2% contamination actually means.

AMK suggested that GK send an email with the video and any other actions he or the TAC would like her to take as Scotland Excel is coming up and she can make sure the LA team are talking about this.

Action: GK to send AM the video on plastic contamination

Action: GK, TAC, or REAL to consider asking AM to take action regarding sharing GK's video for discussion with local authorities and Scotland Excel

REAL to consider CB comments on lack of product complaints reported over the last several months

This was discussed further with the CBs to consider whether this was an issue to be investigated. The CBs noted that this was an observation rather than a potential issue. The CBs extracted product complaint information from audit reports issued between the last TAC and 12th November. All three CBs found no complaints, so there were no concerns raised about this observation.

TAC to share any thoughts on suitable alternative compost comparators to peat with REAL and GK

No further suggestions received.

REAL to consider comments from producer representatives on requiring routine attendance at PAS training courses, possibly every year or every number of years

This was discussed internally and REAL feel while it is a good idea, requiring attendance would not be appropriate as the Understanding PAS 100/110 courses are run by REAL's parent organisation. However, it will be added as a recommendation in the position on technical requirements, not the next one which is near ready for issue, but the version after, to allow for changes to go out for consultation.

Action: REAL to consider comments from the TAC when drafting new section on attending PAS training courses for inclusion in the CCS and BCS Position on Technical Requirements

GK to feed back to producers Red Tractor scheme requirements for fresh produce in relation to the E. coli testing requirements, FYM exclusion period, and food safety control aspect.

Actioned. GK commented that it is likely some green waste producers will always have some issues with this test, but hopefully the feedback from Simon Thorpe will aid in understanding.

REAL to consider with new Forum Chair how to involve new AD operators in discussions

GP confirmed that this had been discussed with Jane Hall, the new CCS and BCS forum chair, and the meeting was successful. JC will deliver an update on the BCS forum later in the meeting.

JC to contact GP regarding Forum follow-up with several AD operators

JC confirmed that this had been actioned, one of the issues was resolved before the forum.

The second issue was related to RBP testing and own inoculum use – there is an added cost associated with own inoculum use, which puts sites at a disadvantage. This was discussed at the forum, and it was noted that the current arrangement is an interim solution and that prices can be negotiated with labs, particularly if an organisation has multiple sites.

REAL to consider advice from the TAC on any future requirements for molybdenum testing under CCS

Slides from the last TAC were shared by TA with KN of the EA. KN shared the slides with EA colleagues to consider whether or not molybdenum should remain on the PAS100 lab reporting template.

Currently molybdenum, and several other elements, are on the PTE reporting template sheet but there are no upper limits assigned. Feedback from the EA was that molybdenum could be an issue to land application if in compost at high (but potential) concentrations and, as such, may need further consideration. Given this, REAL have decided to leave molybdenum, as well as arsenic, fluoride, and selenium on the PAS 100 reporting template. The approved laboratories have been instructed that these elements are currently considered optional in absence of PTE limits.

Action: REAL to consider gathering information on the source of molybdenum in the future

REAL to share TAC slides re molybdenum testing with KN to share with Ian Martin

TA confirmed that this had been actioned, and the comments received had been useful and supported keeping molybdenum on the reporting templates.

TAC to share any thoughts on the EU FPR with LC at Defra

Defra representatives were unable to attend this meeting so no update on this action given.

REAL to consider comments from the TAC on other drivers or deterrents to joining the schemes

REAL followed up with the CBs on comments and discussed this internally. REAL will be reopening the Why Not? Project again in 2023, with the aim to engage with non-certified operators and encourage them to join the schemes. In addition, REAL are considering producing guidance documents for applicants on setting up a robust QMS and accompanying workshop, as CBs had commented this may be beneficial for small scale operators.

JC noted that in the BCS forum, operators commented there was a small trickle of farm-based AD plants working towards certification, and that this is a positive sign. They may not be aware of the pasteurisation exemption in the standard; we could reach out to those operators regarding this path, focus on this part of the standard and advertise this more for those operators.

Action: REAL to consider feedback from JC on farm-based AD plants potentially not being aware of the pasteurisation exemptions and exemptions for co-operatives for the Why Not? Project or other

REAL to consider inviting Defra Peat Team to TAC meetings

REAL discussed this internally, and as with the prior discussion of David Tompkins, we feel it best to liaise with the Peat Team directly, or through working groups.

VC to send paper on issues related to pathogens in compost to TA

TA mentioned that during the previous TAC meeting, Vilma Cortes (VC) raised that she had seen a paper on a fungal potato pathogen in compost. Following the meeting, VC shared the title of the paper in question with TA. TA explained that the paper was on pathogen surviving a mesophilic AD process, i.e., a process without a pasteurisation phase. As such, this paper was not of concern when relating to discussions of compost for use in horticulture, during which it was initially raised. This paper was however discussed with the CBs to be certain, and they confirmed that all plants taking potato waste would have a pasteurisation step as part of their process.

CCS and BCS Updates

Scheme Updates

EL gave an update on scheme numbers:

On CCS there were 175 Certified Processes: 137 in England, 20 in Scotland, 11 in Wales, 6 in Northern Ireland, and 1 in the Republic of Ireland. These were processing ~4.0 million tonnes of input per annum and producing ~1.8 million tonnes of output per annum.

On BCS there were 101 Certified Processes: 73 in England, 13 in Scotland, 8 in Wales, and 7 in Northern Ireland. These were processing ~5.0 million tonnes of input per annum.

GP and SN then asked if any attendees had any questions on the summary paper. There were no questions.

Update on the Approved Laboratories

SP commented that there was not much to update from the labs. However, peat and the sourcing/quality of peat will likely be of growing issue.

In addition, SP commented that there have been a few issues with sample quantities. The lab sends out a container for samples, but it is not returned full. TA queried if this was on BCS or CCS. SP confirmed it was on BCS. TA responded that REAL's guidance is that 10 litres is provided and added that REAL are working on a sampling webinar for BCS and sample size will be included.

Action: REAL to consider feedback from NRM on producers (mainly BCS) not providing enough sample

Update on the Research Hub

EL delivered an update on the work of the Research Hub:

Completed Projects

The Research Library - Currently contains 381 articles on composting and AD across various topics including Associated Emissions, Feedstock & Pre-treatment, and Process Optimisation. The library is regularly updated, and 107 articles have been added since launch in Jan 2021.

The Digestate Data Pack – completed in December 2021, reports available upon request.

Current Project

Evaluation of the potential for the improvement of the Residual Biogas Potential test and investigation of alternative test procedures for PAS110 biofertilisers – This is a BCS-specific project which looks to explore improvements and alternatives to the Residual Biogas Potential test. Aqua Enviro was appointed as the contractor and began work in April 2022. The work is projected to be completed in April 2023.

Upcoming Projects

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

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) – The tender for this project closed on Friday, REAL received no submissions, the Research Hub will be looking for ways forward in the coming weeks.

Evaluate possible alternative area-based methods of assessment for plastics (CCS and BCS), and, How the benefits of applying compost and digestate to soils can be accounted for under the Greenhouse Gas (GHG) Protocol (CCS and BCS) – The tender periods for these projects will commence in winter 2022/early 2023. Projects expected to commence in early 2023.

EL asked if there were any questions on the Hub update. GK asked what could be done about the Plant Response Test project. SN suggested that it could be something to be completed by a MSc student. TA noted that a master's has a short duration, and the test is expensive and takes a long time, so it would be more appropriate for an Mres or PhD.

JC asked what people viewed as the issue with the project. SN and TA responded that there are very few people who want to do this kind of project, it is very niche, it is not a commonly used test outside of the scheme. GP noted that REAL have been discussing ways to strengthen relationships with universities, potentially through webinars.

Action: REAL Research Hub to consider comments from the TAC on potential contractors for the PRT project

Update on the Certification Bodies

RL reported that OF&G have had no complaints and no staff changes since the last TAC meeting.

NJ raised that ACL received one complaint from the NIEA, for a composting site in Northern Ireland. ACL investigated and concluded that the material that had been spread on farmland was not from a certified producer and was a result of the local authority cancelling Green Waste collections in the area.

SA reported that NSF have received no complaints since the last TAC, there has been internal changes of staff, but this has all been communicated to REAL. NSF now have 3 auditors working on BCS and CCS.

Update from the CCS Producers Representative

GK commented that there were few updates from the last forum: contamination in feedstocks was again discussed, in particular new permits having the limit set at 1%, while LA contracts require sites to accept 5%, meaning producers are losing out on tenders. This is perhaps a conversation that needs to be had with the EA, why are all sites not at the 1% limit.

A query was also made at the forum relating to the draft scheme rules that had been sent out for consultation, one of the proposed changes in the draft rules was to increase the size of the certification marks on bags, the concern being around transition for use of bags that have already been printed. REAL clarified at the Forum that there will be a transition period for the rules to come into place. GP added that this has since been discussed further with CBs.

Finally, GK gave the update that attendance was no different to previous meetings, despite hopes that ability to attend online would increase attendance. GP added that this is something REAL have considered and in surveys the most frequent reason for not attending forums is lack of time.

Action: REAL to consider discussing with the EA the issue around some non-certified compost producers obtaining LA contracts with over 1% contamination, and find out what the constraints are

Action: REAL to consider comments from TAC members on requirements for use of the conformity mark, transition periods, and potentially assessing compliance on a case-by-case basis

Update from the BCS Operators' Representative

JC reported that similarly, attendance at the BCS forum was no different to usual, but the new chair made a significant difference and brought fresh ideas.

The meeting began with discussion around the biowaste review, and the issues operators are facing with permits and the time taken for these. In addition, operators are having difficulties engaging Animal Health. Operators are finding much of their time being spent on bottom line compliance.

Additionally, there was discussion on the proposal in the draft scheme rules relating to collecting pricing information, operators sought clarity on the purpose of REAL collating this data from audits and raised that collecting this information may be challenging as other factors such as spreading, and haulage are considered in the price to digestate.

There was also discussion on the RBP test, this update was covered during the actions in this meeting.

One operator commented on the reporting of results against the SEPA limits, suggesting they did not feel that this should be the responsibility of the labs. REAL responded at the meeting that the labs reporting this was the preference of the environmental regulators.

Research proposals were also discussed, and operators agreed that REAL's suggestion of a webinar to support operators in writing of research proposals would be useful.

Operators also raised queries relating to the relationship between VFA and RBP results, if any significant discrepancy between these could be an indicator of an issue at the lab. TA noted that the relationship between VFA and RBP is a rule of thumb, but there are always exceptions. FD commented that in 2013, WRAP did a review of application of the RBP test, which may be worth considering. SN added that the Hub project will also touch on this. JC and TA agreed that they would discuss this further on Friday during the REAL understanding PAS 110 testing webinar.

JC raised that some operators had said that they are still having some issues booking audits, and finally, noted that the forum had ended with some helpful suggestions from the chair on other organisations to work with, so it will be good to see how those ideas progress.

RL noted that both GK and JC had mentioned data to be collected at audits during their update, inspectors are being increasingly asked to collect more data at audits, this information should be collected in a different way as audits are getting so long. Both NJ and SA agreed with this point and SA suggested that data collection could be done on renewal forms instead.

Action: REAL to consider comments from the TAC on collecting information from producers on value/price

Action: JC and TA to further discuss the VFA and RBP discrepancy issue during the BCS testing webinar, and JC to submit feedback following the BCS testing webinar re focussing on VFAs

Action: FD to circulate WRAP report on RBP and VFA work

Action: JC to consider raising VFA and RBP discrepancy issue at a future forum meeting for further discussion with operators on their experience, to identify if it was an isolated issue or wider scale

Technical Issues

Scheme Rules: CCS conformity mark

GP explained that, as referred to in the summary paper sent to attendees; all the requirements around use of the CCS conformity mark, which are currently contained in a stand-alone document, have been brought into the draft scheme rules which were sent out for consultation.

Within the draft CCS scheme rules, REAL have proposed to increase the size of the conformity mark, with three options for size, 20mm, 30mm and 40mm, a document showing these sizes to scale was circulated prior to the meeting. REAL are seeking the TAC's advice on which size would be most suitable.

AMK sought further clarification on why the mark is necessary on the bag if it is displayed elsewhere, for example on sites' websites.

GP clarified that the requirement for the certification mark to be displayed on packaging already exists, but it is a separate document to the scheme rules, and by bringing this under the scheme rules, REAL are looking to make this auditable. This is important following previous TAC meeting discussions relating to traceability. In addition, the increase in the size of the mark was suggested in prior TAC meetings to aid in visibility and recognition for compost end users. SN and AMK agreed that it would be beneficial for reinforcing the identity of the scheme.

SA asked if these requirements related to products which are wholly PAS 100 certified material, rather than including also blended products, and also asked about supply chain organisations (SCOs), how will these be audited. GP noted that the requirements are solely for producers, mentions of SCOs have been removed as not auditable. EL answered that the current draft of the rules says the percentage of PAS 100 material in blended products necessary to claim conformity is down to the discretion of the CB. SA suggested this would be worth discussing across all three CBs to avoid differences.

RL suggested REAL reword the requirements to refer to only sealed bags, to impact upon only the compost going to garden centres.

GP moved discussion on to the size of the certification mark; previous discussions at the TAC had suggested that 18mm was too small. REAL received only two comments on the size of the certification mark; one saying that 20mm would be sufficient, and the other commenting on the need for a transition period. REAL consider that 20mm is still too small, so would like to seek the TAC's opinion on the proposed sizes. JC, AMK and SN all felt that the largest size would be most appropriate. SA added that it should be above 30mm.

Roy queried whether it was mandatory for the mark to be used.

SA suggested that long term, REAL should seek traceability through the supply chain.

GP commented that REAL will consider these queries and suggestions from the TAC.

Action: REAL to consider comments and advice from the TAC regarding mandatory or optional use of the CCS conformity mark and decide on requirements in the rules going forward

Action: REAL to facilitate discussion with CBs and achieve consensus on when the use of the mark should not be given for compost producers supplying blended products re percentage of compost in the blend

Action: REAL to consider comments and advice from the TAC on the minimum size of the conformity mark

Scheme Rules: Remote Auditing

GP explained that one of the proposals in both the draft CCS and the draft BCS scheme rules relates to allowing for remote auditing and REAL would like to seek the TAC's advice on if they would have any major concerns, or can identify any major issues if remote annual auditing was to be introduced for all producers, conducted biennially, but subject to a risk assessment produced by REAL.

SA commented that NSF use remote audits on a few other schemes and find it works very well. SA queried what would be included in the risk assessment. GP explained that REAL have not made a decision on this, it will be discussed with CBs before introduction.

GK queried how elements of the audit, such as requiring producers to sample in front of auditors, would be conducted online. SA responded that it would be possible to have the site take the sample on camera and then send the sample recorded delivery.

AMK added that if conducted biennially, this issue is likely to have limited impact, and that also CBs will still be able to conduct in person spot visits if they have concerns. RL agreed this would be possible, so the schemes would still be robust.

SA commented on robustness, noting that when NSF ran the figures from covid, on average, there was not a drop in number of non-conformances across various schemes we use this on.

GK queried what would be the price implications if remote auditing introduced. SA responded that NSF don't charge back travel expenses, but a change to remote auditing would prompt them to review fees.

Action: REAL to consider comments from the TAC on what to include in the risk assessment issued to the CBs for deciding on when to undertake a remote audit (if taken forward in the rules)

Action: REAL to consider comments from the TAC on introducing remote audits to the schemes

AOB

GP had one AOB to raise on scheme test methods. GP informed that there was no update on the BCS PC and Stones method since the last TAC meeting, however, REAL have been further discussing plans for 2023 to formally issue the method, and therefore allow REAL to take responsibility for the method. This will allow the method to be updated in future with technical changes. REAL will be conducting a review of methods next year and are looking to take over other scheme methods ownership.

AMK had one AOB to raise, asking if anyone has looked at cost increases on the sector and knock on effect it may have on the industry, is it a possibility that operators skip things to save money. Some participants may likely begin to struggle. SN agreed this is something to think about, but in some respects, it is not specific to this meeting. Roy commented that the only feedback he's received is from BCS and was positive re prices and fertiliser costs.

Actions:

- GK to send AM the video on plastic contamination.
- GK, TAC, or REAL to consider asking AM to take action regarding sharing GK's video for discussion with local authorities and Scotland Excel
- REAL to consider comments from the TAC when drafting new section on attending PAS training courses for inclusion in the CCS and BCS Position on Technical Requirements
- REAL to consider gathering information on the source of molybdenum in the future.
- REAL to consider feedback from JC on farm-based AD plants potentially not being aware of the pasteurisation exemptions and exemptions for co-operatives for the Why Not? Project or other
- REAL Research Hub to consider comments from the TAC on potential contractors for the PRT project.
- REAL to consider feedback from NRM on producers (mainly BCS) not providing enough sample.
- REAL to consider discussing with the EA the issue around some non-certified compost producers obtaining LA contracts with over 1% contamination and find out what the constraints are.

- REAL to consider comments from TAC members on requirements for use of the PAS mark, transition periods, and potentially assessing compliance on a case-by-case basis.
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- JC and TA to further discuss the VFA and RBP discrepancy issue during the BCS testing webinar, and JC to submit feedback following the BCS testing webinar re focussing on VFAs.
- FD to circulate WRAP report on RBP and VFA work.
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- REAL to consider comments from the TAC on introducing remote audits to the schemes.