



## Producers Forum Meeting Minutes

Thursday 28<sup>th</sup> May 2020

Online

### Attendees:

Gaynor Hartnell	Chair
Georgia Phetmanh	REAL
Molly Rogers	REAL
Olivia FursseDonn	REAL
Gregor Keenan	CCS Producers Representative
Jo Fitzpatrick	Material Change
Carolyn Richards	Green Waste Company
Emma Cheetham	MEC Recycling
Claire Porter	SED Services
Georgina Smith	Hope Farm
Agnes Starnawska	TW Composting
Sarah Manwaring	Earnside Energy
Angela Cronje	Earnside Energy
Reinis Purvins	Veolia

### Welcome and Introductions

GH welcomed everybody to the Forum and initiated a roundtable introduction.

### Updates on the CCS

GP introduced REAL and the CCS. REAL is a subsidiary of the REA and it runs a number of certification and consumer protection schemes. The aim of the Forum is to provide certified operators with the opportunity to raise, discuss, and submit for the CCS TAC issues associated with the Scheme.

GP highlighted a way of structuring the agenda for forum meetings, where all actions from the last meeting which are not covered within the meeting are grouped together and covered at the start, in order to aid time keeping.

- *REAL to circulate PP slides to all forum Attendees*

This has been completed and all attendees received the slides.

- *REAL to update audit checklist in future with new positions*

This has been updated and uploaded to the website. It will be updated going forward with new positions added to the CCS Position on Technical Requirements.

- *Georgia and Gregor to explore restructuring of Forum and presenting actions from meeting*

This Forum meeting was restructured to address previous actions throughout the meeting.

- *REAL to consider sharing information about why certificates are suspended/withdrawn*

Going forward, REAL will continue to share anonymised information about certificates with a limited amount of information based on what we receive from the Certification Bodies.

- *REAL to add Gaynor to CCS/BCS mailing lists*

This has been done and GH now receives all scheme communications.

- *REAL to circulate updated analysis request form*

This was done and recirculated.

**Action:** REAL to include an agenda item for checking the previous meeting's minutes for accuracy at the beginning of each meeting

### Scheme Status

As of May 2020, there are currently 178 certified processes on the CCS: 140 in England, 20 in Scotland, 12 in Wales and six in Northern Ireland. There are approximately 3.8 million tonnes of input per annum. 150 processes are supplying to agriculture and soil-grown horticulture, 72 to domestic or professional horticulture, 54 to land restoration, and four to forestry.

Since the start of 2020, there have been seven applications to the CCS, two certificates suspended (one has since been reinstated) and three withdrawn certificates.

### Scheme Developments

REAL published their spring newsletter on the 22<sup>nd</sup> May, which included news on; the successful contractor for the first project of the Research Hub, PAS 100 review, Compost Quality Protocol review, the Laboratory Approval Scheme, and the announcement of the new Independent Laboratory Auditor.

REAL's 2018 annual report was published, which stated that by the end of 2018 on the CCS: there were 179 certified processes (137 in England), 2.6 MT of green waste only, and 1.2 MT of green waste and ABP, were being processed by certified sites annually in the UK. There was approximately 1.8 MT of quality compost being produced annually and 123 out of 179 composting processes were operated as OAW. There were 17 processes that operated as a combination of IVC with subsequent aerated static piling and 18 as IVC with subsequent OAW processing.

Operators thought it would be useful to compare data across years in regard to market data for CCS e.g. to understand if the proportion of compost going to agriculture has risen.

**Action:** REAL to consider comparing trends with figures in annual reports for market data.

**Action: REAL to aim to include information on the proportion of sites with waste management licences that are certified under CCS.**

#### Clause 4.2 and SQCS

- *REAL to discuss compliance with clause 4.2 and SQCS at CBs roundtable meeting.*

The Certification Body roundtable meeting was held in March and was attended by auditors and certification officers. The issue of reported inconsistency amongst CB's in terms of assessing compliance was raised, with some auditors having different interpretations of the clause. Auditors shared feedback and there was acknowledgement this is a complex document with misunderstanding around HACCP. Without HACCP training it is particularly difficult for producers to understand this clause. It is REAL's suggestion to use the position on technical requirements document to ensure consistency.

The discussion at this meeting concluded with a consensus of introducing requirements for HACCP training as an interpretation of PAS 100 requirements to be written into the position on technical requirements. REAL also plan to roll out SQCS workshops soon for operators, which will provide a platform for discussion around the HACCP requirements.

JF noted that it was worthwhile reintroducing a template which provides a basis of what to include. GP noted that this template will be introduced through the workshop. AS commented that some companies do not deliver training online and that there is a worry there will not be any face to face training until the end of the year.

**Action: REAL to consider sharing SQCS standard template with all operators when developed**

#### Sampling workshop

REAL hosted a half-day sampling workshop near Edinburgh in October. The workshop was based on the new CCS sampling guidance and the aim of the workshop was to guide operators to take representative samples of their compost and to ensure consistency of sampling between operators. The workshop had a three-part structure; a run through of CCS sampling guidance, practical sampling demonstration and developing SOPs.

GK noted that it would be useful to record the sampling practice aspect of the workshop and circulate this to operators.

**Action: REAL to record practical element of the workshop and make video available as a resource**

#### Sampling Webinar

In April 2020, REAL held a sampling webinar for operators which had a similar structure to the workshop in Edinburgh. REAL intend to hold more sampling workshops at different locations in the UK when possible.

**Action: REAL to explore whether the sampling webinar should be recorded in the future and made available as a resource**

#### Laboratory Approval Scheme

REAL have developed a framework for laboratories approved to undertake testing on the CCS. The Certification Bodies are now involved in the approval process of the laboratories and there have

been four LAS conference calls with the CB's this year. REAL continue to have regular liaison meetings with the approved laboratories.

All three laboratories were audited last year for the first round of combined BCS and CCS audits. REAL received a letter of recommendation to support for labs to continue testing and all labs were reappointed for 2020. The laboratories are required to obtain UKAS accreditation for scheme test methods and the Open University has been appointed to conduct the next two audit rounds. The audits will be led by Graham Howell.

Operators questioned the possibility of additional laboratories coming onto the schemes. GP noted that one laboratory has expressed interest in joining and were provided with the application form and guidance notes for applicants. In the most recent CCS newsletter, there was a call for applications. Operators expressed that having more laboratories on the scheme would be beneficial geographically for sampling purposes.

AC noted that having at least 5 laboratories on the Scheme would be advantageous and suggested Universities may be interested in testing. REAL have been in touch with some Universities but have not received any applications thus far.

**Action: Operators to propose to REAL a list of universities or laboratories to contact to invite them to apply to become approved laboratories for the scheme**

#### Testing and Oversize

- *REAL to check whether labs are confirming sample receipt*

One laboratory has a policy of notifying operators if samples have not been received or if they are received outside of timeframes, and at the request of operators will notify them when samples are received. Another lab notifies operators if sample not received but are currently testing a new system to notify operators of receipt of the sample. The third lab sends a sample receipt for all samples.

There was a discussion of the importance of notifications. CR stated that her site changed laboratories due to this issue. Sites are reliant on couriers and the lab had not received their sample but they did not notify the operator of this. EC also reported an occasion whereby the courier had picked the sample up and the laboratory phoned to say that it had not been delivered within the timeframe, thus illustrating how beneficial it is for them to engage with the operator. GK noted that the labs request that samples be sent early in the week to avoid up to a week's delay before testing.

Operators asked if the scheme would accept an approach of a fail being made invalid on the database due to delayed testing. GP noted this is a decision for the CB's as it is a certification issue.

- *REAL to continue exploring issues with testing oversize*

REAL is working with Tom Aspray and analysing PSD data for coarse grades (0-40/50mm). So far through this analysis, there has been a large variation in min and max data in samples that are labelled, which is inconsistent with PSD data. Some samples are labelled as 0-40mm, but they are only 0-10mm. This issue was discussed at the Certification Bodies roundtable meeting and REAL are in the process of producing guidance to utilise data coming back from the labs to assign compost grades.

Producers highlighted that this categorisation is tricky as 0-10mm is technically 0-40mm if it had only been through a 40mm screen. During audits, sites could put their product through a smaller screen

and the particle size could be changed to make the categorisation more accurate however, this would have to be revalidated as the particle size has changed.

- *REAL to record comments on oversize for inclusion in PAS 100 during next review/revision*

The PAS 100 review was commenced and concluded this year with BSI. REAL will be in contact with BSI again in the autumn. Comments on oversize that were reported through the Forum have been recorded in the minutes for the next review. If any operator is looking to certify shredded and processed or composted oversize to produce mulch, this can be discussed with the CB and proposals will be considered on a case by case basis.

#### UKAS accreditation

The approved laboratories are required to gain UKAS accreditation for standard test methods to ISO 17025 in the revised version of the laboratory T&C's.

To set up specific accreditation for CCS, UKAS' comments regarding PAS 100 and the CCS Scheme Rules were addressed.

#### Audits during pandemic

During the Covid-19 pandemic, site inspections are no longer taking place. For initial audits, audits are carried out remotely with real time conferencing techniques. A spot inspection at the applicant's site will be carried out when safe to do so. For renewal audits, audits are carried out remotely with real time video conferencing. REAL is in discussion with the CBs and regulators with the scheme position under review.

#### Research Hub Update

NNFCC has been appointed as the contractor to carry out the first project of the Research Hub: 'The development of a Research Library for the Organics Recycling Industry'. The aim of this project is to compile all research done in composting and AD industries to date and create an online library of this research. It is NNFCC's intention to categorise this research and produce 'thematic summaries' (to be displayed within the digital library) to introduce each topic/research area identified.

As part of the literature review, NNFCC will engage with CCS Operators in an 'Industry Needs Assessment' to gauge opinions on what areas they perceive to be lacking in research/needs driving forwards. The results of the literature review and the gap analysis will be incorporated within the website. The project is due to start in June and expected to finish in January 2021.

REAL ran a call for proposals from 24th January to 4th March, where operators and wider industry were invited to submit research project proposals in an area that they would like to see research carried out. The Research Panel met in March to evaluate all projects submitted during the call for proposals and 3 projects were shortlisted to go through a second round of evaluation by the panel. Stephen Nortcliff is currently discussing the project proposals with the submitters for the second evaluation round.

Operators would like to be sent a survey on the projects shortlisted by the RH in order to express their views on the merits of shortlisted projects and influence the final selection.

## Update on MDWG

At the CCS Forum in October, there was a survey running to gather views from operators on changes to the CQP in relation to waste inputs and new market sectors. REAL received 10 responses from compost and AD operators and these were collated for discussion in January.

- *REAL to check soil association position with PTE's for green waste derived compost*

SA published a technical note on DEFRA's EA regulations for organic certification. This was discussed with the MDWG and it was considered that the questions surrounding the technical note are related to the EU regulations themselves and this should be discussed with DEFRA. REAL has been aiming to meet with DEFRA organic team to discuss questions and issues regarding interpretation.

## Review of the CQP

The EA announced a call for evidence period in December where industry was invited to provide evidence to influence the EA's decision on whether to continue or withdraw support for the QP's.

- *REAL to consider sharing Agency's template with all operators*

This template had been put together for the EA. Following this, industry was asked to identify issues in the QP, which aspects needed to be reviewed, evidence for the issues and suggested changes. The template was circulated by REAL to all operators.

REAL is regularly liaising with the EA to seek clarity on timings, scope and evidence explanations. The EA's plan had been to publish the outcome of initial review at the end of May (this has been pushed back due to Covid-19). The industry will be expected to fund the revision costs, which is estimated at £20K per QP. The industry would have 3 months to respond and if there is no clear commitment to fund the revision, the QP would be withdrawn and the EA will aim to set out areas they consider are not supported. REAL is uncertain on what the Agency is expecting to suggest needs to be changed within the QP until they publish their position.

Operators suggested that it would be good to have an idea of areas the EA are looking into which would require further evidence. It is expected that PC's will be included. Trade bodies will be working with their members to pull funds together following the agency's announcement.

**Action: REAL to continue to seek clarity from the Environment Agency on plans for the CQP review**

## Feedback from the TAC

There have been reported issues surrounding subsampling where producers would prepare samples and sub sample in a separate container. This issue was taken to the TAC. This is no longer allowable, and producers must take a single sample. NRM said that arrangements could be made for samples to be sent directly to the pathogen lab in order that the lab would receive the sample and sub sample straight away. AS queried why the lab was allowed to sub sample but the composter was not, and noted that the producer is now sending samples directly to the pathogen lab.

- *Gregor to raise at TAC the issues surrounding plant top growth failure*

This has been actioned by setting up the PRT TWG which is comprised of two producer representatives. The terms of reference for the group has been drafted and REAL are now liaising with all the environmental regulators to confirm representation on the group.

- *REAL to communicate implementation timescales for complying with CCS position*

This was discussed at the subsequent TAC meeting and advice given to specify three months for a specific BCS position, in line with UKAS. Implementation timescales will be discussed and agreed with CB's before communicating any changes to operators.

- *Gaynor to write to TAC about plant top growth failures raised at the forum*

This was actioned.

#### Any Other Issues

One operator reported having carried out six plant response tests simultaneously, to test the consistency of the PRT results. Although between tests, the results remained consistent, there were some random results. The data was put together to assess trends with the control tray. This issue was flagged with the laboratory which saw that top growth was the biggest issue whilst seasonality and various factors were questioned.

The PRT TWG will look to see if there is an appetite for a new test which is fit for purpose. GK hopes that there will be experts from the EA that share the same view on the tests, and it is clear there is no appetite for anything that is a relaxation of the standard. There is a lot for the technical working group to consider. For example, if seeds do not germinate and there is a failure, it is not necessarily a 'bad product' to put on soil and a lot of the time the problem is not obvious.

#### **Action: Georgina to provide Gregor with information to present to the plant response test TWG**

RP questioned whether the laboratory T&C's control lab methods for testing composting.

The T&C's were revised last year in consultation with the labs and annually revised. REAL will invite the CB's to contribute.

GK noted it would be helpful to have access to REAL's database to view a trend in results. GP clarified that REAL cannot grant producers access to the database, but it will be possible to submit a data request form to REAL. REAL plan to publish a data sharing policy soon, which sets out when data may be shared.

#### **Action: REAL to share Data Access Request Form with Gregor Keenan when available**

GK advocated that online meetings are useful; this was a consensus amongst the group. All attendees supported the idea of one face to face meeting per year and one (or more) virtual meetings.

**End**

## **Actions**

- REAL to include an agenda item for checking the previous meeting's minutes for accuracy at the beginning of each meeting
- REAL to consider comparing trends with figures in annual reports for market data
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- REAL to consider sharing SQCS standard template with all operators when developed
- REAL to record practical element of the sampling workshop and make the video available as a resource
- REAL to explore whether the sampling webinar should be recorded in the future and made available as a resource
- Operators to propose to REAL a list of universities or laboratories to contact to invite them to apply to become approved laboratories for the scheme
- REAL to continue to seek clarity from the Environment Agency on plans for the CQP review
- Georgina to provide Gregor with information to present to the plant response test TWG
- REAL to share Data Access Request Form with Gregor Keenan when available
- REAL to consider whether to hold one or more online Forum meetings