



## Producers Forum Meeting Minutes

Wednesday 16<sup>th</sup> October 2019

DWF, Bridgewater Place, Water Lane, Leeds, LS11 5DY

### Attendees:

Gaynor Hartnell	Chair
Georgia Phetmanh	REAL
Molly Rogers	REAL
Gregor Keenan	CCS Producers Representative
Howard Everson	TMA Bark
Amy Ashton	Ashton's Composting
Maria Mateu-Garcia	White Moss
Matthew Chapman	MEC Recycling Ltd
Emma Cheetham	MEC Recycling Ltd
Mike Storey	TW Composting
Steve Pritchard	Veolia
Helen Ashton	Ashton's Composting
Patricia Arcenegui	Veolia

### 1. Welcome and introductions

The ninth meeting of the CCS Producers' Forum was held on 16<sup>th</sup> October in Leeds. There were 14 attendees in total, including Gregor Keenan, the CCS Producers' Representative. Gaynor Hartnell welcomed everyone to the meeting and did a roundtable introduction.

### 2. Actions from the last meeting

Georgia provided an update on the actions from the last meeting, which can be found [here](#).

- *REAL to consider timescales for facilitating discussions and addressing technical enquiries*

GP confirmed that there are no set timescales for addressing technical enquires, and few get escalated to REAL. Each enquiry is situation dependant, so it is not possible to provide a timescale and new scenarios/proposals will require more consideration.

- *REAL to consider sharing minutes from the forum meetings with the CBs directly*

This is done through contact with the certification officers.

- *REAL to record the comments on clause 4.2 in PAS 100 for the next review of PAS 100*

The next review of PAS 100 is due to take place in 2020 and comments from the last meeting have been recorded for this review.

Producers feel that clause 4.2 undermines the status of PAS certified compost as a quality product and if customers would like any further specifications for the product, this should be required outside of PAS.

- *REAL to consider how best to engage with local authorities in the future*

GP informed that a call had been arranged with LARAC and they will be invited to attend the next TAC, as they would have valuable input and contributions to the discussions around contaminated feedstock.

There were questions on whether the MDWG should focus on improving feedstock quality. However, multiple organisations have introduced initiatives to focus on this work, including the EA, through their plastics taskforce. Producers commented that it is difficult to change public attitudes and producers have no control over incoming feedstock.

Improving quality of the incoming feedstock is not within the remit of the MDWG.

- *REAL to check whether CBs calculate 45 days from audit day or final non-conformances*

GP clarified that this was 45 days from the non-conformance. Each annual audit non-conformance has a 45-day window.

- *REAL to consider clarifying 'splitting' samples and 'subsampling'*

There was confusion over subsampling on site. Operators were taking samples from a batch which was then considered subsampling. There were issues with pathogen testing- not all laboratories have in-house pathogen testing facilities and transport to the subcontractors takes time, which is critical for the test concerned.

REAL concluded, based on advice from the TAC, that subsampling is not allowed under the scheme. Operators cannot send a separate pathogen bag directly to the laboratory which is to do the test. One organisation discussed this with NRM and were told that they can send some of their whole representative samples to the subcontract laboratory. Producers argued that if it was acceptable for one producer, then it should be acceptable for all.

- *REAL to check with CBs how they are checking use of the new conformity marks*

Producers commented that they do use old compost bags with the old conformity marks, as to do otherwise would be a waste of stock. This is allowed but will be marked as a non-conformance during an audit. The corrective action for producers would be to confirm that the new conformity marks will be used on new bags.

- *REAL to record comments on timeframes for updating checklists after changes to rule*

Operators suggested that there should be a one-month period in between complying with rules that have come into effect and these being transferred onto the audit checklist. REAL should ensure that transition periods are aligned.

- *REAL to consider timeframes for updates and communicating updates to operators*

Operators feel that there is not enough notice given when changes are made to the scheme. However, confidential discussions between REAL/CBs/TAC cannot always be shared prior to announcement of scheme updates or changes. Producers think REAL should give warning when the conversations are taking place or give generous time for the documents to come into effect. REAL will consider timeframes for complying with updates. The lag time should be longer in order for producers to be able to comply before an audit.

- *REAL to consider developing/disseminating SQCS/HACCP template (format not content)*

This would replace the previous template and can be used in conjunction with workshops for HACCP. The main issue is interpretation as the template can be subjective and different auditors interpret the document differently. Producers flagged the need for another workshop to ensure uniformity in interpretation.

It was noted that some auditors still have different interpretations of what constitutes conformance, even after completing the HACCP course. It was suggested that producers and auditors should attend the same course, as ensuring both had the same information might avoid differing interpretations.

- *REAL to record and discuss comments provided on the Research Hub*

The charging structure of the Hub was questioned at the last forum. GP clarified that the Research Hub is in its early stages of charging fees and that the fee structure will be reviewed next year. The fees are charged in the same structure as the capitation fees (based on input tonnage per annum).

Operators asked if they could be informed of the justification for chosen research projects. This will be discussed at the next meeting of the Research Panel at the end of October.

REAL are considering the option of allowing producers to vote on shortlisted proposals.

- *Georgia/Gregor to share the suggestion for market development with MDWG members*

Taken to the MDWG meeting.

- *REAL to investigate whether the Agency has information on waste types already put forward*

Operators asked if it would be possible to request the list of waste types already been put forward to as this should prevent duplication of submissions. If there is a waste type that is added to the list, there needs to be justification and evidence for this. GP confirmed that the EA was set to release an evidence template for the QP review.

REA/REAL to consider sending a call for evidence to operators. This might fit the role of a trade body rather than REAL. Some producers have not applied to be PAS certified, as some outputs are not covered by PAS (e.g. compost from mobile plants). If these outputs were considered it might encourage producers to seek PAS certification.

- *Operators to consider proposing to the trade body that a QP for oversize is developed*

REAL confirmed that oversize fragments are outside the scope of PAS 100 and are likely to remain so. A new QP and scheme would have to be developed for the material, and this is something which could be progressed within a trade association. Operators queried whether the material could be shredded and re-composted.

It was noted that REA/REAL may host the next ORG and Producers' Forum meetings on the same day in 2020. This should enable further discussion of common issues that operators/producers encounter, and the chairs of the respective meetings can ensure that issues are discussed in the appropriate forum.

### **3. Scheme Updates**

GP gave an update on the number of CCS applications/suspensions/withdrawals since Jan 2019. Producers felt that there should be further guidance on revalidating certificates after a process type change- one certificate was withdrawn for this reason.

There was a request for REAL to provide further information regarding suspensions and withdrawals, so that operators could better understand the reasons behind them. This could provide useful learning points for operators. REAL noted that this would have to be done in a manner that did not reveal commercially sensitive information.

### **4. Scheme Developments**

Georgia provided an update on key scheme developments since the last Forum meeting including the Annual Report – republished in October 2019.

There was a reminder to use the scheme's analysis request form with the certification code and sample number on the form. Producers at the forum had never seen this form despite being sent it in REAL communications.

More communication with labs is necessary as some producers do not get notified when their samples are sent to the labs. NRM has begun to send notifications of sample receipt.

### **5. CCS position on technical requirements**

Operators asked if clause 4.2 of PAS 100 could be met by having a check box at the bottom of an order form, to confirm that there are no additional requirements.

Producers raised concerns over inconsistencies of auditors' approach to meeting clause 4.2. EC suggested that the quality specification is written down with all components of the product, at the end of this spec the customer ticks a box which confirms that they are satisfied with the product and the standard it will meet. A statement page of all quality requirements from recent analysis is clear. This in turn makes the customer responsible for this clause, as they have been fully informed of the product components.

### **6. Test Failures**

It was confirmed that if there is a test failure before a certificate is renewed, and a producer cannot sample/test another batch following the implementation of corrective actions, the producer can sign a declaration note issued by the certification body to confirm that they plan to take them.

## **7. Laboratories**

Laboratories are going through another round of audits, this year combined with the BCS audits, following revision of the Terms and Conditions.

One laboratory was not reappointed and REAL are developing a Laboratory Approval Scheme, in which the CBs will be involved with the approval process.

## **8. Market Development Working Group**

The MDWG is comprised of representatives from REAL, trade association, Zero Waste Scotland, and nominated BCS and CCS Producers' Representatives and is a sub-group of the BCS and CCS Technical Advisory Committee (TAC).

Key work arising from first meeting:

The first meeting established a relationship with the Research Hub, explored existing AD/biogas data and communicated development of the Quality Assurance Schemes to the markets, planned to engage with organisations e.g. NFU and other potential stakeholders, identified relevant farming/organic contacts at DEFRA for discussion around organic regulatory requirements and liaised with operators about the MDWG plans and QP reviews.

Key work arising from second meeting:

Gathered views from operators on new waste inputs and market sectors for the ADQP (and CQP) reviews, put forward comments (to REAL) on digestate processing for PAS 110 review and/or revision, explored options for PAS promotion/marketing campaigns, communicated development of the QAS to the markets, engaged with the Soil Association and DEFRA.

MDWG meeting with the Soil Association:

There is potential for the Soil Association to share a list of 'A grade' compost producers with their organic members, however, there were questions raised over who would compile this list of A grade compost producers.

The new PAS requirements related to fitness for purpose (clause 4.2) and the potential for field bean testing for herbicide residue will be communicated to SA members. They may consider this for their standards and communicate to their members that they can ask for additional requirements for anything they are concerned about. The SA is most concerned about plastic contamination and aminopyralid.

Soil Association announcement:

Historically, compost from IVC could only be applied to organic land where the food waste component of the feedstock was from household waste only. The new interpretation now allows the use of compost where the feedstock contains food waste from commercial kitchens, including any processing facility that produces food waste. The compost must be PAS 100 certified and the heavy metal limits are the same as previously.

The MDWG is planning to set up a series of meetings with DEFRA to further understand organic regulatory requirements.

## 9. CQP review

The EA has released a briefing note regarding the review. However, a review does not necessarily involve revision. If it is decided that the Quality Protocols require updating, then industry will be required to bring forward the evidence to support changes to the Protocol.

MDWG released a survey that gathered views on additional inputs and markets to put forward to the EA during the review, which closed on 23<sup>rd</sup> October.

## 10. Feedback from the last TAC

There was a discussion on pathogen sampling between the Environment Agency and REAL- the outcome of this conversation is that subsampling is not allowed under CCS. GK will seek explanation of this outcome at the upcoming TAC meeting. This is a recurring issue, and operators felt they were not being kept sufficiently informed.

## 11. Technical issues

There are various technical issues related to oversize that have not yet been addressed. The Hub's Research Panel concluded that project proposals concerning oversize were out of scope, as not currently permitted under the scheme. Questions: is there any potential to look at oversize within the Hub, and would there ever be scope to address these issues? During the next review of PAS100, producers stated that oversize should be considered.

Non-standard test methods (plant response test, PC tests): there was a lengthy discussion around this topic whereby producers are failing on tests such as stability, PC and growth trials – with no explanation as to why. Corrective actions for failures of these tests are unclear and there is little knowledge on how to pass them. The main market for PAS 100 compost is agriculture and these tests were designed for horticulture, making them unsuitable for their purpose. Attendees at the forum flagged that research projects 7 & 8 (concerned with addressed issues in these tests) submitted to the Hub should take priority. Gaynor to write to the TAC regarding plant response test failure issue.

Residual herbicide does not break down in compost but if these herbicides are applied to soil they will naturally break down. Alternative test methods that are more suitable should be looked at during the next PAS 100 revision process e.g. field bean test, which is more sensitive. Producers felt there needs to be more stakeholder engagement of the problems surrounding this test. REAL to acknowledge these issues at the TAC meeting.

**Close**

## Summary of Key Actions

- REAL to circulate PP slides from Forum to all attendees
- REAL to communicate implementation timescales for complying with new CCS positions
- REAL to update audit checklist in future with new positions
- REAL to discuss compliance with clause 4.2 and SQCS at CBs roundtable meeting
- REAL to consider sharing Agency's QP template with all operators
- REAL to continue exploring issues with testing coarse compost/oversize
- Georgia and Gregor to explore restructuring of Forum and presenting actions from meeting
- REAL to consider sharing information about why certificates are suspended/withdrawn
- REAL to add Gaynor to BCS/CCS mailing lists
- REAL to circulate updated analysis request form
- REAL to check whether all labs are confirming sample receipt
- REAL to check Soil Association position with PTEs for green waste-derived compost
- REAL to record comments on oversize for inclusion in PAS 100 during next review/revision
- Gaynor to write to TAC/REAL about plant top growth failure issues raised at Forum
- Gregor to raise again at TAC the issues surrounding plant top growth failure