

Compost Certification Scheme

Notes from the Producers' Forum Meeting – 7th November, Birmingham

1. Introduction of compost producers

The seventh meeting of the CCS Producers' Forum was held on 7th November in Birmingham. There were six certified producers represented at the meeting and 10 attendees in total, including Gregor Keenan, the CCS Producers' Representative. The meeting started with a roundtable introduction.

Their roles were diverse with one attendee working as the Quality and Compliance Officer for a large company that runs a number of certified sites. Another attendee is working in the marketing and sales department. Two attendees work for a large supplier of compost and growing media; a Quality Technician and Quality Manager. One attendee represented a certified compost producer at the Forum but as a consultant, supports a number of composting sites both certified and non-certified.

2. Actions from the last meeting

Georgia provided an update on the actions from the last meeting, which can be found in the summary notes on our website [here](#). She explained that the storage limit was set at 6 months in PAS 100:2018 because it was agreed at the Steering Group that compost quality could deteriorate over long periods in storage – the proposal was put forward by SEPA. However, there was no evidence to show that this begins at 6 months so retesting is a recommendation only.

Operators raised questions over other clauses in the standard. With regard to clause 4.2, operators asked what happens with customers that arrive on site and do you need to agree in writing, beforehand, any additional requirements with every customer. One company has written on their website that the product is approved to PAS 100 but customers need to agree any additional criteria before their order. Their trade body advised them to discuss this with their CB.

Operators also questioned whether compost should be reassessed if stored on a farm off site. Georgia shared that she thinks the compost would not need to be reassessed if stored on separate farmland because it's been dispatched as a product, however, she will check with the CBs.

One operator and manufacturer of growing media questioned whether compost should be reassessed if blended with other materials and bagged on site then stored for 6 months or longer. Georgia shared that she thinks this would not be required as the compost product has been blended so the new product will not be subject to PAS requirements but this will be checked with the CBs.

Another action from the last Forum was for REAL to consider all points/questions raised during the discussions around the Research Hub. With regard to the proposals for operators with multiple sites to be charged on total tonnage produced rather than per site, Georgia informed that this hasn't yet been decided but will be soon by the Hub's Oversight Committee.

The action for REAL and Gregor to consider producing a paper on the revision of PAS 100 was taken forward as a press release. The press release was positive and outlined how the new standard would improve the quality of compost. However, it also explained that there were limitations and introduced the Research Hub. The press release was picked up by two or three environmental publications. One operator suggested sharing the positive press release with local authorities. Georgia suggested that we could maybe do this through LARAC and NAWDO. A positive paper had been shared with Defra on the PAS revision and operators enquired whether this could be shared.

The final action was for REAL to explore whether the Scheme Rules can specify timeframes for the supply of non-conformances by the certification body/auditor to the producer. REAL had specified a maximum timeframe of 10 days in the Scheme Rules consultation document but this would need to be discussed further with the CBs and decided once the consultation had ended. One operator stated 10 days is better than 6 weeks (when they received their final list after their audit).

There was discussion around auditors assessing sampling techniques and most operators agreed that they would be happy for the auditor to witness them take a sample and evaluate their technique. Though they were all in agreement that this was only to assess the technique and that it was not practicable to have a sample timed for the audit that could be taken for lab analysis.

With regard to other changes/proposals made in the Scheme Rules consultation document, operators shared that a 45-day time limit for addressing non-conformances is too tight with testing timeframes and 90 days would be more appropriate. 45 days wouldn't work for testing on some parameters and this should be changed. Georgia confirmed that REAL would consider this.

3. Scheme Update

Georgia provided an update on scheme numbers and scheme developments. There were 175 certified processes producing over 1.9 million tonnes of quality compost on an annual basis from over 3.9 million tonnes of feedstock materials. Four new processes had become certified since the beginning of the year, two certificates had been suspended, and five certificates withdrawn.

The update on recent scheme developments included:

- a) Annual Report 2017
- b) Cost comparison England 2018
- c) Summer newsletter
- d) Technical guidance updates

One section on splitting samples for pathogen testing was debated at the meeting. Operators did not think it was fair and put forward arguments for why they would split a sample for pathogen testing. It was queried whether any more can be done to prevent the potential manipulation of sub-samples instead of not allowing it. This discussion will be taken to the TAC to seek advice.

- e) UKAS and the scheme documents

f) CCS Scheme Rules

Operators asked whether the TAC has any input into the revision of the Scheme Rules. Georgia informed that the consultation document was sent to all members of the TAC and we discuss the proposals at the meetings. The next meeting is taking place in several weeks' time.

g) Market Development Working Group

h) Technical Advisor

i) Appointed Laboratories/PAS 100 testing

Operators asked how we could develop proficiency testing schemes for certain tests e.g. plant response test. Georgia informed that REAL's Technical Advisor is attending the TAC and will explain how this could be developed as he will be working on this project as a contractor.

4. Summary of changes in PAS 100

Georgia presented the summary of changes in PAS 100 including the introduction of clause 4.2. Operators asked for clarification over this clause and how this would work with garden centres. Who would be the customer in the case of garden centres; their customers or the garden centre? Georgia shared that she thinks the garden centre would be the customer so any additional requirements would need to be agreed in writing directly but she will check with the certification bodies.

Operators asked how the CBs would assess whether or not they have complied with the clause on waste wood. They asked where the waste wood is coming from as they use clean palettes. There isn't a lot of waste wood available. They asked whether the CBs would check visual inspection records. Georgia confirmed that this will also be discussed with the certification bodies.

With regard to the new recommendation for insulated static pile processing, operators enquired who is using this technology and informed that the sheets are too hard to move. They commented on the positive or negative aeration in static piles and the effect on bio aerosol emissions. Positive aeration pushes air through the piles and may increase bio aerosol emissions. They weren't aware of any company utilising aerated static piling technologies. However, CCS data shows that a percentage of certified composting processes are operated this way. One operator is interested in this technology so will read the Annual Report and contact their trade body to discuss further.

5. Research Hub

Georgia and Virginia presented an update on Research Hub developments including information about the governance structure and decision-making process.

With regard to the potential research projects that might support future changes to PAS 100, operators informed that they would like to see a change to the stability parameter. One operator thinks it was introduced to prove that a proper composting process was taking place (i.e. not shred and spread) but questioned why it is needed now when spreading quality compost to land.

Operators suggested we could look for sources of funding elsewhere if the funds are not large enough to cover potential projects. Operators suggested commercial funding from companies that

the Research Hub might benefit; for example, McCain paying for research to give comfort that plastic/contaminants do not cause any issues for potato production. REAL would need to consider conflicts of interest. With regard to concerns over the split between CCS and BCS funds, Virginia assured that proportionality will be considered and reflected.

Operators advised that those who don't attend the CCS Producers' Forum will need to recognise the benefits of the Hub and know that payment of the Research Fee is mandatory. There was concern that not everyone on the scheme will be supportive of the Hub and might oppose the fees.

Virginia explained that the process will be transparent and accountable, which is the basis on which we have set it up and the Oversight Committee will be responsible for that. The onus is on us for the first year and the industry will need to have faith. We could do a review after three years and potentially reassess. We could ask those that do not want to pay, what would you like changed? What are the economic benefits? Gregor stated that he is very supportive of the Hub and stressed that it is needed. Operators suggested that we could share the newsletter wider with proposed Hub benefits. With regard to the fees, Virginia explained that if we set up a different accounting system, it would cost money from the Research Hub so it is easier to charge with an annual fee.

Virginia advised everyone to think now about project ideas and send these in writing. We are asking now and then we will hopefully get more buy-in from operators – we need to promote the benefits.

6. Feedback from the last TAC meeting

Gregor provided feedback from the last TAC meeting in June but most of the discussions had been covered earlier in the day. On the subject of complaints, however, Gregor shared that he does not think all product complaints are reported to the TAC/REAL. Operators informed that there might be fewer complaints raised because farmers do not want it known that there is plastic in the field and they won't go to the Agency by choice. One operator informed that their organisation receives lots of complaints but they aren't escalated to the scheme. It is likely that we are only aware of the unresolved complaints. We should present a fuller picture at the TAC. Georgia will check the clauses in the scheme rules consultation document and REAL will consider this proposal.

In relation to the Research Hub, operators suggested that one project could be to get oversize into biomass – this could be shared in the newsletter as a potential project. Although, operators commented that oversize might not be suitable for all boilers as high chlorids cause issues in some. We could also explore new markets considered important by the industry.

On the subject of defining maximum grade sizes for certified compost under the scheme, operators asked how we could specify this. Georgia informed that the Technical Advisor will present this discussion at the TAC. One operator explained that we need to be careful with basing this on the test methods as the maximum sieve apertures are 20mm so this could cause problems.

On the subject of the new quality assurance scheme/scope of certification, operators enquired whether the CBs will charge different pricing structures. Georgia didn't think the certification fees will change as they already charge for 'PAS 100 only' certification for Scotland.

With regard to the new conformity marks, Georgia informed that the draft marks would display the words 'end of waste' to match the scope of certification but operators advised that they would not want the word 'waste' displayed on their product. They asked what the transition period will be considering bags already printed with the old mark. REAL will consider all of this for the revision.

Operators shared that the cost burden is too high on compost producers at the moment. They need to source income through the gate fees. They suggested that LAs should not be sending waste to non-certified sites but one operator informed that smaller non-certified sites are spreading on their own land so the quality is often better and they are also subject to several audits.

Virginia described how WRAP provided a lot of support in the past but is no longer active in the organics recycling industry so we, as an industry, now need to replace WRAP's support with our own input. For the PAS 110 revision, all the reports that informed the revision were produced by WRAP. It has been very difficult securing their attendance at meetings now and the contact has waned.

REAL hopes that the introduction of the quality assurance scheme will attract smaller operators but one individual shared that PAS is off-putting with all the paperwork required. One operator argued again that it has cost a lot of money to get PAS certified and councils should only send to PAS sites. The gate fee has gone down and there are too many costs.

7. Issues raised by CCS Producers' Representative

No issues had been raised directly with Gregor since the last Forum meeting.

Operators asked where the next meeting will be held and whether it could be held in Sheffield. Georgia will discuss this with the chair and share details with everyone as soon as possible.

Close

Summary of Key Actions

- REAL to discuss with CBs the enquiries on interpretation of new PAS 100 clauses
- REAL to consider how positive paper to Defra/press release could be shared with LAs
- REAL to reconsider the 45 day limit specified in scheme rules consultation doc
- REAL to seek advice from TAC on the position of splitting samples for pathogen testing
- REAL to discuss scheme rules consultation comments at the TAC meeting
- REAL to update technical guidance with positions on new SR and PAS requirements
- REAL to consider how producers are charged Research Fees with multiple sites
- REAL to consider comms for operators about the Hub and request ideas for projects
- REAL to discuss with CBs the reporting of all product complaints to the TAC
- REAL to present at TAC how we could use test methods to define maximum grade sizes
- REAL to present draft conformity marks at TAC and consider implementation timeframes
- REAL to consider smaller cert/capitation fees for smaller sites applying for CCS QAS

Attendees

1	Georgia Phetmanh	REAL
2	Virginia Graham	REAL
3	Gregor Keenan	Producers' Representative
4	Jo Fitzpatrick	Material Change
5	Emma Cheetham	Willen Biogas
6	Michael Wheatley	SJB Recycling/Yorwaste
7	Matthew Wilkinson	SJB Recycling/Yorwaste
8	Simon Blackhurst	White Moss Horticulture
9	Lee Palfreyman	White Moss Horticulture
10	Bob Potts	Vital Earth GB Ltd