

## Compost Certification Scheme

### Notes from the Producers' Forum Meeting – 18<sup>th</sup> August, Cambridge

#### 1. Introduction of compost producers

The fourth meeting of the Compost Producers' Forum was held on 18<sup>th</sup> of August in Cambridge. There were 7 compost producers represented at the meeting and 11 attendees in total. The meeting started with a quick roundtable introduction. The compost producers' representative, Gregor Keenan, who represents producers at the Technical Advisory Committee (TAC) meetings, also attended the meeting. Operators were asked for their reasons on joining the Compost Certification Scheme. The consensus was that by joining, their compost could achieve 'product' status and no longer be regarded as waste. This was requested by their contracts with local authorities.

#### 2. Legislation / Regulation updates

The update considered only the most relevant areas of legislation and regulatory changes.

- a) New compost/digestate position in Scotland
- b) EU fertiliser regulations
- c) ZWS/WRAP projects
- d) PAS100 review/revision

The Scottish Environment Protection Agency (SEPA) hasn't yet published their final regulatory position statements or new guidance on food waste management in Scotland. The Organics Recycling Group (ORG) will soon be discussing these proposals with SEPA but believes SEPA are prepared to consider the consultation responses and listen to the industry. Research shows that a high proportion of composting sites could achieve tighter limits on physical contaminants but not as tight as the limits SEPA are proposing. Nobody present at the meeting was aware of whether the Environment Agency (EA) will also propose revisions to end-of-waste criteria.

#### 3. Scheme Update

We gave an update on the size of the scheme and the recent developments. There are currently 176 certified processes with a certified input tonnage of 3,357,414tpa producing 1,815,031tpa of certified compost. The update on recent developments included:

- a) New complaints procedures
- b) Removal of CCS templates
- c) UKAS accreditation for scheme
- d) Labs work: audits, proficiency testing scheme, and new labs
- e) Database development

- f) New PAS100 sampling regime
- g) Update from compost producers' representative

No issues have been raised with Gregor Keenan between the last TAC meeting and the CCS Producers' Forum Meeting but producers can contact Gregor freely to raise any issues with him.

#### 4. Discussion

This part of the meeting was an open discussion with all present. The main focus of the discussion centred on the review and/or revision of the PAS100 standard, and the progress made so far. There was also some discussion revolving around the issues with compost sampling and testing.

Summary of comments:

- One complaint raised against the practices of the CCS Appointed Laboratories concerned the collection of materials by a courier. The complaint highlighted that only one courier collects the samples, and when the courier fails to collect it, the sample is not tested. In this eventuality the courier may return later to collect another sample but the batch will be older. *Clause 12.6 in The PAS state that the sample must be sent by the composter to an appropriate laboratory within 1 working day after the sample was taken. The standard strongly recommends that the composter uses a service that will deliver the sample to the laboratory within 48 hours.*
- It was proposed that a 'retest' option should be made available. Operators suggested that they could take further samples of their compost batch to verify if the initial test results were correct. REAL CCS affirmed that it is not the Scheme Rules that prohibit and prevent this but the requirements of PAS100. *Please see Clause 12 of PAS100.*
- Operators voiced concern over potential mistakes made by the CCS Appointed Laboratories in relation to test results. REAL CCS assured operators that if a mistake is checked and acknowledged then the results should be made invalid. We also reminded operators that if they have a complaint against one of the CCS Appointed Laboratories they should copy us into the email that they send to the laboratory. We are then made aware of the issue and can seek to resolve it if necessary.
- Operators enquired about the progress made with the review/revision of the PAS100 standard. REAL CCS informed the operators that we have received a draft proposal from the British Standards Institution (BSI) for the revision of PAS100. The distinction was made between 'review' and 'revision' of PAS100. A 'review' of the standard will assess whether a comprehensive update is required, or whether just a small number of minor changes are considered. 'Revision' is a separate process triggered when a number of major changes to the standard are considered.

- REAL CCS is now ready to begin the process and will sponsor the revision of PAS100. However, there is a lack of funding for the evidence- based research to support any proposed changes. The group recognised that the evidence gathering exercise needs to be carried out prior to the formal revision. WRAP cannot fund the project. Zero Waste Scotland (ZWS) intended to conduct the scoping study but funding is no longer available. We will be exploring alternative options for raising funds through the Scheme which will be discussed in more details at the next meeting. The operators proposed that the industry should provide financial and other contribution to the R&D work as the main beneficiaries of the changes.

Questions that were raised during the discussion;

- Could PAS100 be revised to introduce different parameter test limits for different end markets? There was agreement in the room that the limits for stones should be changed for the agricultural end market, and there are still concerns around *E. coli* and compost stability. Operators claimed that Quality Meat Scotland (QMS) does not have the evidence to show any harmful consequences of physical contaminants applied to fields.
- Will PAS100 need to be aligned with SEPA's the revised regulatory position that they are proposing? We will discuss this with SEPA but the CQP doesn't have to be.
- Who will make the final decision on the PAS100 revision? Everybody on the steering committee will make the decision unanimously. The environmental regulators will be part of the steering committee. Operators expressed concern over EA's opinion on the stones limits. Operators questioned the necessity of the stability test – *WRAP have been reviewing test methods and associated threshold limits for stability and physical contaminants in PAS100 and will be informing REAL CCS once published.*
- Would it be possible to change the sections of PAS100 that we can obtain supportive evidence for now, and then subsequently change the PAS100 requirements for aspects that we don't currently have evidence for? REAL CCS informed operators that it would be too expensive to approach the revision process in this way. PAS100 should be 'reviewed' every 2 years but 'revision' is a different process and it's important that the revision is accomplished correctly in order to achieve the desired outcomes.
- When will the PAS100 revision process begin? The steering committee has not yet been set up and we envisage the project starts as soon as we have evidence to support the changes. It is very likely to take place in spring 2017.
- What can be done independently of BSI? The next Compost Certification Scheme Producers' Forum will hopefully be held early in 2017 and can be used as a platform for this discussion. It will focus on revision of the standard, and REAL CCS will aim to encourage participation and increase awareness of this amongst CCS producers.

- Could we utilise existing results/supportive evidence from research projects that have already conducted, and then identify the outstanding areas where research hasn't been carried out? REAL CCS could tender/subcontract for this work, and use the recent ZWS scoping proposal to identify areas lacking research. REAL CCS could open up a consultation to ask if anybody is aware of existing research.
- It was stressed that PAS100 needs to be revised because the industry has changed and more food waste is being accepted/treated at composting sites. The group also recognised that the end market for quality compost is changing with growing demand in horticulture.

## 5. Date of next meeting:

The next Producers' Forum meeting is likely to be held in February 2017.

## Close

## Update following the meeting:

WRAP have been reviewing parameters for stability and physical contaminants in PAS100 and will be informing REAL CCS once published.

SEPA has a meeting in late September to discuss the consultation responses. There are numerous workshops planned in relation to their consultation.

## Summary of Key Actions

- REAL CCS to consider the ZWS PAS100 scoping study proposal, and produce a summary of outcomes drawn from the ongoing discussions around the PAS100 review/revision
- REAL CCS to set up meeting with WRAP and ZWS regarding PAS100 revision, REAL CCS to set up teleconference with EA to discuss PAS100 revision
- REAL CCS to consider setting up a Facebook group to provide a platform for CCS producers – information can be gathered on producers' opinions regarding the PAS100 revision – REAL CCS to promote the Producers' Forum and ensure operators are aware that the forum meetings can be used for these discussions
- REAL CCS to collect information from other organisations about existing research they're aware of that could feed into PAS100 revision – organise workshops (next step) – REAL to consider whether next forum meeting to be PAS100 workshop
- REAL CCS to consider a mechanism for sources of funding to support the PAS100 revision

## Attendees

1	Virginia Graham	Chair (REAL)
2	Justyna Staff	CCS, REAL
3	Georgia Phetmanh	CCS, REAL
4	Jenny Grant (remotely)	GP Green Recycling
5	Ciaran Burns (remotely)	REAL
6	Gregor Keenan (remotely)	Keenan (Recycling) Ltd
7	Ben Dyson	Greener Composting
8	Martin Graves	Envar Composting Ltd
9	Howard Everson	TMA Bark Supplies Ltd
10	Rachael Moles	Amey
11	Kiel Porter	Amey