

Compost Certification Scheme

Notes from the Producers' Forum Meeting – 22nd May, Sheffield

1. Welcome and introductions

The eighth meeting of the CCS Producers' Forum was held on 22nd May in Sheffield. There were seven certified producers represented at the meeting and 14 attendees in total, including Gregor Keenan, the CCS Producers' Representative. Gaynor Hartnell welcomed everyone to the meeting and introduced herself as the new Chair for the CCS Forum going forward.

During the roundtable introduction, Georgia explained the function of the Forum and Gregor introduced his role as Producers' Representative, taking issues to the TAC and feeding back to the Forum. He informed that we also discuss relevant legislation and frameworks for development.

After introductions, Georgia showed some slides setting out the relationships between different bodies contributing to scheme development, along with an updated decision-making tree.

An updated 'Decision Making Tree' was presented, which now shows the process for how technical enquiries are dealt with if escalated by a Certification Body (CB). If producers have any enquiries related to clarification on the interpretation of a requirement, they should contact the relevant CB directly. If the CB is unable to address the enquiry, REAL will facilitate a discussion with all three CBs and when necessary, involve members of the TAC to assist.

Operators asked what the estimated timescale is for dealing with technical enquiries. One operator had been waiting for several weeks and still had not received a response to their proposal. They were aware that it was being discussed between REAL and the CBs. Operators also expressed that they have a good relationship with their auditor, but the auditor will ask the CB for clarification on the operator's behalf and they do not think this is appropriate.

Georgia will circulate the decision tree and will consider communicating timescales for responses.

The updated decision tree can be found here: www.qualitycompost.org.uk/certification/enquiries.

There were no comments on the minutes from the previous meeting.

2. Actions from the last meeting

Georgia provided an update on the actions from the last meeting, which can be downloaded from [here](#). One of the actions was for REAL to discuss the interpretation of new PAS 100 requirements, related to enquiries received at the Forum meeting, with the CBs.

a) Reassessing compost after 6 months in storage

One of these enquiries related to whether compost is required to be reassessed (after 6 months) if dispatched and stored on a farm off-site. It was agreed that reassessment is not required unless the

farm is an extension of the compost site, as it is out of scope; the compost had been dispatched as a product. The same applies for compost blended with other materials – it is out of scope.

Operators had also enquired whether compost is required to be reassessed if bagged and stored on site. Georgia confirmed that the scheme's requirement for reassessment covers bagged compost. Operators queried which tests are required and against which parameters. Gregor clarified that reassessment does not necessarily mean re-testing; however, operators must demonstrate to the auditors what they have done by way of reassessment. E.g. has there been any risk of deterioration or contamination with weed seeds? If the compost is bagged but the bags have been inspected and found to be in good condition and weed seed contamination could not have occurred, the operator has demonstrated that reassessment has been carried out, for example.

Operators asked how they would reassess. Would they need to open the bag, and if so, every bag? Could the limit not be extended to 12 months for bagged compost and kept at 6 months for compost in bulk storage? Where did 6 months come from? Georgia and Gregor advised that the requirement is in the standard so cannot be overridden but the requirement is for 'reassessment' not 'retesting' because the evidence was not there to support this. There needs to be a limit for compost in storage because properties may change, and operators should be confident that the compost is still in good condition. The CBs need concrete evidence of this check/reassessment.

Gregor advised that if retesting does not take place, operators would need to justify to the auditor that the reassessment was successful and justify their decision not to retest – this all forms a discussion with the auditor. One site could check for weed seeds but justify that it is different for bagged compost. The condition of the bag may tell you a lot about its content.

b) [Checking and agreeing quality requirements with customers](#)

Georgia also explained that operators are required to check with customers arriving on site whether they have any additional quality requirements and that this check needs to be recorded. However, a record of this check could be a pro forma or other form of paperwork that the customer signs to confirm they are happy with the compost certified to PAS 100.

Operators reported that the auditors have different interpretations in terms of what is acceptable. One operator has written on their website that the compost is certified to PAS 100 only and if customers have any additional requirements, they should contact the operator. This website sign-up was enough for one auditor but not enough for another. Georgia informed that REAL will circulate the updated 'CCS Position on Technical Requirements' document to try and improve consistency in the interpretation of these requirements amongst operators and auditors. Operators suggested that REAL should also share notes from the Operators' Forum meetings with CBs.

It was generally felt that this clause should be reworded for the next version of PAS 100, as it implies that PAS 100 compost may not be of sufficient quality. Operators suggested that this issue could be considered by the MDWG. It was suggested there should also be guidance for the CBs on what is acceptable (e.g. a written or verbal check) because asking customers is awkward and onerous.

Operators asked why this requirement is in the PAS. Gregor explained that there was a product complaint involving compost that was not fit-for-purpose and there may have been a communication breakdown regarding the end use. It was commented that some operators let the whole industry down and one complaint can cause huge waves if picked up by the media, and then the entire industry suffers. It was stressed that we need requirements in the standard e.g. clause 4.2 to prevent this from happening, otherwise there will be no trust in PAS 100 and it only takes a few incidences to damage the reputation. "It's not a problem until it's a problem."

One operator does not do cash sales so checking whether customers arriving on site have any additional requirements is not a problem for them. The same operator asked what would be considered compliant if a customer would like the operator to produce a 0-20mm grade from a 0-30mm grade on site. Does this count as an additional requirement and can they change the grade size for the customer on site? The consensus was that this was acceptable.

c) Accepting untreated waste wood

At the last Forum, operators also enquired how the CBs would check whether they have complied with the new PAS 100 clause about waste wood and how they would check that the wood is untreated. Georgia reported that the CBs had explained they would check operating procedures, interview staff if available, check what's on/in the pad/process/product on the day of inspection through visual inspection, check it is listed when accepting it as an input material, or check rejected material. Most of these checks will be carried out on the day of inspection by the auditor.

d) Promoting PAS 100:2018 to local authorities

Another action was for REAL to consider how the paper shared with Defra, or the press release about the positive update to PAS 100, could be shared with local authorities. Georgia was liaising with a member of the LARAC executive board and hoped to disseminate the paper through their channels, but this could not be actioned. More work needs to be done and relationships built. This PAS promotion work could be considered by REAL's MDWG.

e) 45-day limit for non-conformances before certificate renewal

REAL was to reconsider the 45-day limit specified in the Scheme Rules consultation document for addressing non-conformances, as feedback had suggested that test results took longer if flagged as a non-conformance. Operators questioned whether this 45-day period starts from the day of the audit or the day that the last non-conformance is raised (if raised following the audit). Some operators receive a final list of non-conformances much later, which they consider unfair. Gregor explained that the certification officer at the CB will review the audit report provided by the inspector and may identify non-conformances that hadn't been identified on the day.

Operators argued that the 45-day timeframe for addressing non-conformances should begin at the time a non-conformance had been communicated to them, and in the situation where there was already a non-conformance and a new one had been added that the 45-day period for addressing them should be separate. Georgia will check what the CBs require for this clause.

f) Splitting representative samples on site into a sub-sample for pathogen analysis

REAL was to seek advice from the TAC on the position of splitting samples for pathogen testing, considering comments from operators at the last Forum meeting. Gregor mentioned that REAL is considering developing a sub-sampling guidance/protocol following the TAC meeting.

One operator shared that some of their on-site staff do not understand the difference between 'splitting' and 'subsampling' and it needs to be more clearly defined. In their opinion, they are subsampling when they take a representative sample. Operators are now confused as to whether they can sample at all. This company carried out sampling and testing experiments because they frequently received *e. coli* failures with no explanation – they no longer failed on this parameter when they sub-sampled on-site. They are now questioning why this position is in place. They stated that not enough notice was given on this decision, and it was made without justification.

Georgia explained that REAL CCS holds this position because the scheme documents do not specify any procedures or guidelines or protocol for subsampling.

Gregor thinks it does not make sense for the samples to be sent to one laboratory, then sit in transit for a long duration when sent across the country. The sample could be in transit for 24/48 hours.

There is also concern over the potential for sample manipulation/microwaving subsamples on-site. However, operators argued that if a sample had been pre-heated/sterilised, the laboratory would be able to identify this.

REAL was unaware that some operators were subsampling on-site for pathogen analysis, and the Environment Agency does not approve of this. The regulator thinks they should be batch samples. Gregor commented that given the Environment Agency would not look favourably on subsampling / splitting samples, it may not be wise to pursue. If it was pushed too hard, or if the regulator suspects that operators are microwaving samples, the result might be that the Agency would insist on independent sampling. Operators could push back against some rules but should concede on others. The scheme must be robust, and the standard must be adhered to as it is written.

Operators felt that laboratories should be able to test all samples in-house. Failing this, they should be able to send their representative sample to Sciantec for pathogen testing, and Sciantec could then send a subsample to NRM to test for the other parameters. Georgia will discuss this possibility with NRM and colleagues.

g) CCS Scheme Rules and CCS Position on Technical Requirements

REAL was to discuss comments submitted on the Scheme Rules consultation document at the TAC meeting, which had been actioned, and the Scheme Rules had been finalised.

REAL was to update the technical guidance document with positions on new Scheme Rules and PAS 100 requirements. The guidance document has now become the CCS Position on Technical Requirements, which accompanies the Scheme Rules and provides clarification on certain scheme requirements. Operators complained that there was not enough notice given for the new rules and

that the documents were not updated in sync; PAS 100 was updated, the checklist was updated, then the Scheme Rules were updated, and the checklist updated again. Georgia will consider all this feedback for the next review/revision of scheme documents.

h) Research Hub fee structure and research project proposals

REAL was to consider how producers are charged Research Fees for the Research Hub when operating multiple certified compost processes. Georgia explained that REAL had considered this carefully but decided not to change the fee structure now. It will be reviewed in the future.

Operators argued that the structure penalises operators with multiple smaller sites, and that a tonnage-based fee structure, perhaps nuanced by the number of different composting processes used would be fairer. They argued failure to address this may result in them pulling out of the scheme. Operators consider that they are losing out if they fall in the 25-50,000 tpa bracket because those over 50 are all paying the same fee. It was suggested that REAL extend the fee table and charge per tonne. REAL could compare the income based on this new structure and analyse the results, as comment was made that potentially not enough funds would be raised. Georgia will share these suggestions and feedback with her colleagues.

REAL was to consider communications for operators about the Research Hub and request ideas for research projects to raise awareness and increase interest. This was actioned and research project ideas were invited with 35 proposals submitted in total, and 13 shortlisted by the Research Panel.

Operators questioned why the project proposal related to oversize was not shortlisted. Olivia and Gregor explained that the Panel considered this was not within scope, as oversize is not compost. Operators argued that this project was universally supported and would benefit everyone on the scheme. Scheme participants should have more influence over the decision making. A suggestion was put forward on whether operators could vote on projects before they are shortlisted, and whether the Panel could provide justification for why certain project proposals were not shortlisted.

Gaynor suggested developing a new Quality Protocol for oversize material for use in biomass stations, which could be a project taken forward by the trade association. Georgia will share this feedback and suggestions with her colleagues for consideration with the Research Hub.

i) Product complaints, maximum compost grade sizes, and conformity marks

REAL was to discuss the potential for reporting of all product complaints to the TAC with the CBs. This was done and a new requirement was added to the Scheme Rules for the CBs to report all product complaints and the nature of these complaints to the TAC.

REAL was to present at the TAC meeting how we could use the test methods to define maximum grade sizes for compost certified under the Scheme. Georgia explained that we are looking at PSD data now to explore whether grade sizes are representative of the material. This work is ongoing, but we will discuss this again at the next TAC meeting. There are many different grade sizes and the markets may not understand the difference. Coarse grades may not be representative.

REAL was to present draft conformity marks for the three categories of certification at the TAC meeting and consider implementation timeframes. This was actioned and the conformity marks were finalised and then issued, based on comments from the last Forum. Operators commented that the six-month transition period for use of the new marks is not long enough.

Finally, REAL was to consider smaller certification/capitation fees for smaller sites applying to the Scheme for quality assurance purposes only (under CCS QA). Georgia explained that REAL cannot prescribe the certification fees and the capitation fee structure was revised but may be reviewed again. It is expected that smaller on-farm operators would be interested in the CCS Quality Assurance category of certification, but the CBs had reported few to no enquiries to date.

3. Scheme Update

Georgia provided an update on key scheme developments since the last Forum meeting.

a) CCS Scheme Rules

The previous version of the rules was revised with respect to UKAS' comments, previous comments collated on the rules, the Research Hub development, the introduction of a quality assurance scheme, and the updates to PAS 100. Version 8 came into effect on 1st January 2019. It was issued with the new CCS Position on Technical Requirements (formerly Technical Guidance) and a transitional period of 1 month for operators to meet the requirements and a deadline of 1st July for producers using bags printed with the old conformity marks. Operators commented that six months is not long enough for using all bags, but it is for ordering and buying them. One operator buys the bags from September to November and will use them by August, so they are still in the middle of the season. Some operators have printed the previous mark on 50,000 bags already.

Gregor commented that there is no difference in terms of quality requirements so use of the different marks should not be a significant problem. Georgia will check how the CBs will assess this.

Operators asked when the checklists were sent to the CBs. There was a transition between PAS 100 and the Scheme Rules, which meant the January audits were audited against the 2011 PAS 100 standard instead of 2018 because the CBs hadn't received the paperwork from REAL. This resulted in wasted work for those working to the 2018 version. It was suggested that there should be a time limit for issuing the rules. Georgia will record these comments and take them into account during the next review/revision of the rules.

Operators also asked if there would be any repercussions, if there are references to the old version of the standard or the rules. Two certificates have been sent to their customers in some cases, one referring to PAS 100:2011 and the other to PAS 100:2018. It was concluded that these references should not matter, providing the compost is certified. This may require an explanation of the difference in the two standards to the customer, but it should not matter.

b) CCS Position on Technical Requirements

c) Approved Laboratories

It was not possible to cover these updates in detail due to limited time.

d) SQCS workshops

Georgia provided an update on workshops held for the CBs on how to assess a Safety and Quality Control System (SQCS). The workshops were developed and delivered by an RSPH approved HACCP trainer and REAL. Discussions took place on how market/customer requirements should influence the HACCP/SQCS. The trainer reviewed example SQCS documentation provided by operators and these were discussed. Georgia provided a summary of the comments including; hazards were grouped together but they should be separated in the HACCP plan as they may have separate CCPs.

Operators commented again that there is an inconsistency amongst the CBs in terms of assessing compliance with HACCP. More needs to be done to improve consistency in the approach.

It was shared that training on HACCP should help to simplify the process. HACCP should help to reduce the process down to the most critical points. Operators requested that the workshop presentation material be distributed. Georgia commented that the presentation material will not be very useful, as the discussions and conclusions were the most beneficial. REAL is looking to roll out more workshops for operators but is currently seeking appropriate trainers.

Operators shared that all the CBs and auditors attended the same REA/ORG training courses on HACCP, but auditors come from different backgrounds and interpret the criteria differently. An up-to-date HACCP template would be useful. It was removed several years ago and REAL does not issue templates anymore. It was suggested that it may be worth developing a template so that all operators use the same format, but not content. Operators shared that the REA course exam does not relate to composting but instead to food (level 2 HACCP in food hygiene). Georgia will investigate whether it would be possible for REAL to disseminate a HACCP/SQCS template.

e) Winter newsletter

f) UKAS accreditation

It was not possible to cover these updates in detail due to limited time.

4. Research Hub

Olivia provided an update on the developments of the Research Hub, including a presentation on the project proposals shortlisted for the survey, which was sent to all operators. Similar comments were raised regarding an explanation for why certain projects were/were not shortlisted and the possibility of voting on all proposals. One operator suggested that money be spent on the Market Development Working Group (MDWG) developing marketing materials for operators to use and to provide to their customers. More work needs to be done to promote PAS 100. Gregor and Georgia will take this to the MDWG, and the Hub-related comments will be provided to REAL colleagues.

5. MDWG

Georgia provided a quick overview of the work for REAL's MDWG that arose from the first meeting of the Group in January. The Group has been set up to focus on market-related issues/opportunities

and report back to the CCS and BCS Technical Advisory Committee. It will provide industry with the opportunity to build and develop new and existing markets for *quality compost* and *biofertiliser*. Key work for the Group, which arose from the first meeting, includes approaching the NFU and other stakeholders to introduce the Group and share its aims.

Georgia asked operators whether there are any markets for *quality compost* that they think could be developed or built or restored. Operators did not have any suggestions or ideas at this stage but commented that more needs to be done to promote PAS 100. It may be too late to engage with local authorities now about the latest updates to PAS 100 but more should be done in future.

6. Review of the QPs

Georgia provided an update from the Environment Agency regarding the review of the CQP. The CQP and ADQP will be reviewed within the next two years (and prioritised over other Quality Protocols), however, a review might not result in an update (or revision). If the Agency decides that the Quality Protocols do require updating, then industry will be required to bring forward the evidence to support changes to the Protocols. Industry will be informed of the outcome of the upcoming reviews and an Agency Briefing Note will become publicly available soon.

Georgia asked operators which aspects of the CQP require updating, in their opinion, if the CQP is revised. Are there any new wastes that could or should be added as permissible input materials in Appendix B, for example? Operators queried whether we know what has already been put forward to the Agency in terms of waste types. Georgia did not have this information but will investigate.

Regarding potential new market sectors, operators expressed that they would like a market for oversize but understand this is not being considered. Gregor explained that oversize is considered not to fit into the current scheme/current quality standard. It was suggested that oversize may need its own Quality Protocol and the trade body could push for this.

7. Feedback from the last TAC meeting

8. Issues raised by CCS Producers' Representative

There was insufficient time allocated for the meeting, so updates from the last TAC meeting and issues raised with the CCS Producers' Representative were not provided separately.

The meeting will be extended for future meetings.

Close

Summary of Key Actions

- REAL to consider timescales for facilitating discussions and addressing technical enquiries
- REAL to consider sharing minutes from the forum meetings with the CBs directly
- REAL to record the comments on clause 4.2 in PAS 100 for the next review of PAS 100
- REAL to consider how best to engage with local authorities in the future
- REAL to check whether CBs calculate 45 days from audit day or final non-conformances
- REAL to consider clarifying 'splitting' samples and 'subsampling'
- REAL to check with CBs how they are checking use of the new conformity marks
- REAL to record comments on timeframes for updating checklists after changes to rules
- REAL to consider timeframes for updates and communicating updates to operators
- REAL to consider developing/disseminating SQCS/HACCP template (format not content)
- REAL to record and discuss comments provided on the Research Hub
- Georgia/Gregor to share the suggestion for market development with MDWG members
- REAL to investigate whether the Agency has information on waste types already put forward
- Operators to consider proposing to trade body that a QP for oversize is developed

Attendees

1	Georgia Phetmanh	REAL
2	Olivia FursseDonn	REAL
3	Gaynor Hartnell	Chair
4	Gregor Keenan	Producers' Representative
5	Stuart Moore	SJB Recycling/Yorwaste
6	Emma Cheetham	Willen Biogas
7	Michael Wheatley	SJB Recycling/Yorwaste
8	Matthew Wilkinson	SJB Recycling/Yorwaste
9	Matthew Chapman	MEC Recycling
10	Agnes Starnawska	Veolia
11	Bob Potts	Vital Earth GB Ltd
12	Jo Fitzpatrick	Material Change