

Compost Certification Scheme

Notes from the Producers' Forum Meeting – 31st May, Northampton

1. Introduction of compost producers

The sixth meeting of the Producers' Forum was held on 31st of May in Northampton. 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 quick roundtable introduction.

There was variation in whether the amount of feedstock supplied on an annual basis had been increasing or decreasing over the past year. One site was processing significantly more feedstock but it was reported at a previous meeting that, in general, supply was lower over the past year.

The businesses were diverse with one producer supplying oversize to biomass and another producer spreading quality compost onto their own farmland. Producers were supplying quality compost to a range of markets with one representative supplying to forestry. Attendees were responsible for different sides of the business, including PAS compliance and site management.

2. Scheme Update

Georgia provided an update on scheme numbers, recent scheme developments, and future plans for the scheme. There were 172 processes in the UK certified through CCS with a collective annual input of over 3.8 million tonnes and collectively producing over 1.9 million tonnes of quality compost. One graph showed that the annual input tonnage processed by certified sites had been gradually increasing since January 2017 from approximately 3.4 million to 3.8 million tonnes. Data on end markets was also presented (for 119 certified processes). Of these, 58 processes are supplying to domestic or professional horticulture, 59 to one market only, and 60 supplying to several markets.

The update on recent scheme developments included:

- a) Newsletter
- b) Lab work: audits
- c) CCS database
- d) Cost comparison analysis
- e) Technical guidance

The update on future scheme developments included:

- a) Revision of CCS Scheme Rules
- b) UKAS accreditation
- c) Lab work: proficiency testing schemes

d) Market development

Gabor informed everyone that the laboratories underwent the third round of audits in 2017 and will be audited again this summer. The independent auditor provided letters of recommendation supporting their renewed appointment at the end of 2017. The REAL CCS database is now set up to receive csv files from the appointed laboratories and this will enable us to analyse and potentially monitor PAS 100 test results data recorded in the database. Attendees were informed that they can currently receive their results from the laboratories in both pdf and csv format if they require csv.

We are drafting a Tender Invitation Document for the development and provision of new Proficiency Testing (PT) schemes. One operator questioned whether we are introducing PT schemes due to a lack of confidence in the laboratories and asked whether extra costs will be borne by producers. We assured everyone that we are very confident in the laboratories' services and performance but audits only take place annually. The PT schemes will ensure more frequent monitoring of results and only four more samples a year will be tested at each laboratory so the costs incurred by the laboratories are not expected to rise significantly. However, we will tender for this work so the fee range that organisations would charge for their services will be made evident on submission.

Georgia informed attendees that we are in the process of setting up a market development working group. The objectives of this group will be to increase market confidence in quality compost, promote the CCS and compost, and liaise with the markets/users/consumers. Justyna informed everyone that WRAP used to carry out this work but unfortunately no longer has sufficient resources to support the organics recycling industry. We will seek to fill this void.

3. Feedback from the last TAC meeting

Gregor provided feedback from the last TAC meeting and highlighted that the minutes omitted the discussion that took place around the plant response test. Concerns had been raised previously over an alleged higher rate of winter failures on the plant response test (PRT). Justyna explained that an investigation with the appointed laboratories had commenced following complaints received at the beginning of 2017 and analysis shows that there has not been a higher rate of failures reported over winter. Gabor explained that there was an unusual spike in failures observed in autumn 2016 at one laboratory but this is not consistent over winter months for all laboratories. More work is being done to monitor results and a summary report about the PRT investigation will be published soon.

Gregor described a product complaint discussed at the TAC meeting. One of the certification bodies had carried out an investigation into a complaint last year but the outcome was inconclusive. It was suggested that the compost might not have been fit for purpose as opposed to heavily contaminated with plastic, as was alleged. There was a suggestion to produce a model contract between producer and customer. It was reasoned that if the operator does not know where the compost is being supplied then they cannot claim end of waste because it might not have been supplied to a designated market. Justyna explained that this complaint investigation was challenging because there were third parties, a broker, involved. Operators argued that it is often not known how the compost will be used by the consumer/customer and whether it will be used for a different purpose.

Gregor urged that we all need to focus on feedstock quality issues and is not sure how or if it is being tackled. He suggested that we should push local authorities to supply to PAS certified sites only. Some will specify PAS in their tenders but with a contamination limit of 15% which is unfair on the producer. Gregor stressed that this should be high up on the agenda for all meetings and minuted.

Gregor and Justyna provided feedback from the Steering Group (SG) meeting which took place for the revision of PAS 100 in March. They explained that the Environment Agency did not support certain changes to PAS 100 as there was not sufficient scientific evidence available to support them.

4. PAS 100 revision

Georgia provided an update on the revision of PAS 100. Members of the SG were commenting on draft 3 before the final review. The proposed implementation timescale was presented with a suggested transition period of six months during which operators would have the opportunity to choose to be audited against the old version (PAS 100:2011) or the new version (PAS 100:2018).

Justyna and Gregor informed that a market-based approach was put forward for the revision, proposing different limits for minimum quality depending on the end market but this was not accepted by the Environment Agency as the Agency does not want two different 'baselines'.

We now know more evidence is required to support certain changes to the standard for future revisions and it was stressed that industry needs to be more cohesive to produce this evidence. REAL has launched its Research Hub to contribute to this – more info in the Hub section below.

The summary of changes in PAS 100 was presented and these were discussed at the Forum:

- Revised HACCP section: this section has been completely revised and has become the Safety and Quality Control System section. It now focuses on quality as well as safety. The understanding of HACCP had changed. This section requires a HACCP team to be in place for compliance. The HACCP plan should be a live document and not just handed over for audit once a year. REAL is organising a workshop on this for certification bodies and auditors.
- Re-worded clause about 'waste wood': operators questioned whether there is a lot of waste wood available and asked how an auditor would check this. Would they use the EWC code?
- Recommendation for monitoring insulated aerated static piles: REAL stressed that this is only a recommendation and not a requirement.
- Requirement for re-assessing compliance in relation to storage: an operator questioned why this is 6 months instead of 12 and pointed out that a year is fine for EA deployments. Justyna will email SG for justification. An operator also questioned how re-assessment should be carried out. Re-testing the compost or a visual assessment is recommended e.g. to check for weeds. Operators would need to justify any reason for deciding not to re-test.
- New requirement for checking test results in relation to dispatch: this had not yet been resolved by the SG and was open for discussion. One operator thinks that it would be fine for 'batch 100' to be quarantined whilst waiting for results, providing 'batch 101' can be dispatched. Justyna pointed out that this is not logical but could happen. Gregor shared that he would not want to risk spreading to then inform the farmer of the failure and have to

apply for an exemption with SEPA. Operators discussed how this might be more difficult in winter when it takes longer to make batches and stated that we need a shorter PRT.

- Additional recommendations for soil sampling added to Annex B: operators questioned who the onus is on. NFU didn't want farmers to be told and farmers want all the benefits.

Justyna and Gregor explained that many proposals could not be taken forward. There were approximately 600 comments provided in total. Proposals not taken forward included independent sampling as it was agreed that industry is not ready – there were different variations put forward e.g. witnessing during validation sampling. One operator had trained individuals for sampling and an outsider could inform them that what they are doing is cross-contaminating.

Hopefully, there will be more evidence available for the next revision of PAS 100.

5. Research Hub

Standards like PAS 100 need to be reviewed and updated on a regular basis to reflect scientific or industry developments. Justyna explained that REAL has set up the Research Hub to raise funds and sponsor the necessary development work. Information about the Hub can be found in this [reference document](#). Summary notes from the discussions around the Research Hub are as follows:

- REAL is considering making the reports unavailable to anyone other than scheme participants unless they pay to access the reports. Operators will have funded the research for these reports so it would be unfair to make them publically available.
- A proposed table of annual research fees was presented – there were no objections.
- How will producers be charged if they operate both AD and compost sites?
- If producers operate multiple sites, could their tonnages be summed up for one fee?
- Gregor expressed that this is definitely a good initiative and it is definitely needed.
- Justyna informed that individuals, such as the independent laboratory auditor, have the knowledge to carry out relevant research but funds are not available.
- It was suggested that certified operators could vote to prioritise projects.
- It is important to consider which organisations the reports are sent to.
- The money could be used for manufacturing technology to improve quality, for example. We could contact manufacturers to feed in to this research hub.
- We need to set the brief for what we want to do. We need to bring industry together with producers involved, not limited to several representatives from Forum meetings.
- Could the certification bodies combine fees rather than charge two separate fees?
- We need to establish a robust method of communication with the decision influencers; we need to enquire what format the Environment Agency requires for evidence. We need to find out what is required to support certain changes.

It was pointed out that we would have to be careful if marketing PAS 100:2018 as changes made for an agricultural standard or horticulture. It was discussed whether we should produce a paper on the revision to share with everyone what happened – Gregor could help with this note.

The idea of the Hub and its aims were well received and supported by the CCS Producers' Forum.

6. Issues raised by CCS Producers' Representative

Gregor presented one issue which involved an operator being given a compliance notice approximately 6 weeks after the audit. This delay meant that they were then not aware of the non-conformances for a prolonged period of time. Could the CBs extend their certificate so that operators can address these non-conformances? We will need to check ISO to find out whether we can specify a max time for issuing a compliance notice/list of non-conformances following an audit.

One operator questioned what to do if a courier is late and the testing cannot take place within agreed timescales. Justyna explained that it would not be right to allow operators not to comply with the standard in this respect. Discussion then took place around whether we could amend this aspect of the standard and make the standard ours rather than BSIs. Unfortunately, the courier-related issue is ongoing but REAL will discuss this again with the appointed laboratories.

Close

Summary of Key Actions

- Justyna to check with PAS Steering Group why the storage limit was set at 6 months
- REAL to consider points/questions raised during the discussions around the Research Hub
- REAL and Gregor to consider producing a paper on the revision of PAS 100
- REAL to explore whether the Scheme Rules can specify time frames for the supply of non-conformances by the certification body/auditor to the producer

Attendees

1	Justyna Staff	REAL
2	Georgia Phetmanh	REAL
3	Gabor Hasznos	REAL
4	Gregor Keenan	Producers' Representative
5	Jo Fitzpatrick	Material Change
6	Emma Cheetham	Willen Biogas
7	Michael Wheatley	Yorwaste SJB Recycling
8	Shiraz Ameer	Envar Composting
9	Tendai Beremauro	Envar Composting
10	Carolyn Richards	The Green Waste Company