

Compost Certification Scheme Producers' Forum

Programme for the meeting on 17th May 2023

Start: 12.00 pm

Attendees

Jane Hall (JH)	Chair
Georgia Phetmanh (GP)	REAL
Emma Laws (EL)	REAL
Megan Muller-Girard (MMG)	REAL (Research Hub)
Gregor Keenan (GK)	CCS Producers' Representative
Malcolm Marshall (MM)	Veolia
Shelley Stimson (SS)	New Earth Solutions
Jackie Cooper (JC)	John Cooper Recycling Ltd
Georgina Smith (GS)	Hope Farm
Donelle Fitzpatrick (DF)	Material Change
Stacey Allen (SA)	WasteWise

Registration

General chat and informal introductions while waiting for all attendees to join the call. EL noted SA's attendance and queried whether it was her first forum. SA confirmed it was her first CCS forum.

1. Welcome

EL welcomed everyone and gave a brief introduction to REAL and the forum for any new attendees, then handed over to JH for roundtable introductions.

EL then explained the purpose of the forums (aims) and introduced the programme.

JH queried if there were any issues that producers wished to raise to add to the meeting agenda. GS stated that she wished to touch upon the timing for the new Scheme Rules update. EL noted that an

update was included in the Scheme Developments Paper and confirmed that she would give a fuller update on the Scheme Rules during the Scheme Updates portion of the meeting.

2. Previous Meeting Minutes

All attendees accepted the previous meeting's minutes—no comments or corrections were raised.

3. Updates on the CCS

Actions from the previous meeting

REAL to hold all regular biannual producers' forum meetings online going forward

Actioned—REAL will hold forum meetings online until further notice.

Producers to consider any issues they would like addressed through future research project ideas and consider discussing the ideas with Stephen Nortcliff, Advisor to the Research Hub

The Research Hub set up a workshop for this purpose in February but did not have any industry attendees. However, the Research Hub did receive one proposal from a CCS Producer this year.

REAL to consider JF's comments on the proposed requirement for displaying the CCS conformity mark on the front of the bag only, during the evaluation period of Scheme Rules consultation comments

EL recapped that JF suggested in some cases the conformity mark was on the back of the bag. REAL has changed wording in the Scheme Rules to say "Main face" to allow for display on 'back' of bags if other information is also displayed here. Scheme Rules update given in summary paper – it's in the process of final review, to be reviewed by UKAS. GP confirmed REAL is waiting for UKAS to review the rules.

No further questions.

REAL to consider feedback from producers on potential webinar topics

No suggestions were given for new webinar topics, but Tom Aspray met with Jo Fitzpatrick to further discuss her suggestions for the understanding PAS 100 webinar, specifically filming what happens to producers' samples at the labs. It was decided that this would likely not be possible to arrange with the labs. REAL are, however, always looking for feedback on the webinars to continue development.

REAL to consider feedback from producers on future blog posts/articles for the website

Producers suggested that blogs about best practice (e.g., what various sites are doing) would be of interest. REAL will be producing blogs on this in future.

REAL is awaiting website upgrades and then will proceed with posting our first blog introducing GK as the producers' rep (and operators' rep for BCS). The purpose of this post is to get people more comfortable contacting the producers' rep. Subsequent blog posts may be on best practice.

REAL to add AOB questions to the agenda if possible and reduce meetings by half an hour

Actioned.

Any questions on the summary paper

There were no questions on the Summary Paper sent to all attendees prior to the forum.

4. Update on the CQP revision

Scoping exercises to define the objectives of the risk assessment have taken place or are currently being worked on. Within this scoping exercise, REAL (with REA and ADBA) held a webinar to discuss proposed changes to acceptable feedstocks and circulated a paper for consultation. Responses on acceptable inputs from the webinar were taken to the Task and Finish Group for discussion at the end of April. Separate working groups have also been set up for comparators and quality standards.

The risk assessment work will then begin within the next few months. The EA is still aiming for the end of this year for the revision process to be completed and the new Resources Framework to come into place. REAL is trying to help this be delivered on time.

No further questions.

5. Feedback from the last Technical Advisory Committee

GK provided an update on the issues raised at the TAC and asked for feedback. The main issue raised was the level of contamination that producers are forced to accept to win LA contracts, particularly that many contracts require composters to accept 5% which GK noted is a level far too high in practice.

GK shared his photo of 2% contamination by weight in delivered kerbside collected garden and food waste. GK noted that the industry must move away from 5% being an acceptable level of contamination in received wastes and suggested instead that 1% is nearer the target to aim for. GK then asked for attendees' views on this issue.

Responding to the photo presented, JH noted that by weight, plastic contaminants are very light and garden wastes tend to be very heavy. GK stated that the load in the image would not have usually come to them but was diverted, and GK reiterated that 5% contamination measured visually is inappropriate but it's difficult to argue this with an LA contract.

JC stated that they have contracts with the council that stipulate 5% and have tried to explain to LAs that they understand some element of contamination is expected, but to have 5% contamination forced upon them is a problem as the cost of plastic removal to achieve permit/PAS compliance is prohibitive.

JC also stated that she had concerns about the CQP as the EA has made statements that they hoped to adopt a zero-tolerance policy on contamination. JC asked how a zero-tolerance policy would filter back to the LAs and local councils—as the contractor, JC noted that they don't have much say in the matter so feels they're in a difficult position.

GK stated that this issue has been flagged before because it's not a level playing field—not all composters will refuse to accept high levels of contamination, meaning that sites with lowest standards (that do accept high contamination levels) will often win the business from LAs. GK notes his strategy is

to put pressure on regulators to address the issue at a LA level, otherwise, it puts all pressure on composters who do want to be good service providers.

GK stated he would take this feedback back to the TAC and discuss it with the EA. GK also encouraged composters to discuss the issue with LAs and continue sending LAs photos of contaminated wastes received as someone from a LA may eventually recognise the issue and decide a change is needed. GK noted with a Local Authority from central Scotland, Keenan started applying the contamination charge and when they went back to LAs, all that changed was someone cared about the contamination.

JH queried whether people find this discussion has been well-received with LAs?

GS stated in the chat function: “We have our new permit and it states 1% w/w which should decrease year on year. We are having site meetings with LA's to show what we have been dealing with. We have been sorting and weighing loads and reporting back to the LA. EA have said comply with the permit in the first instance...puts us in a tricky position”.

GK noted that this is a big problem—some people don't have 1% in permit and queried whether this is true across the board.

JH stated there are definitely permits without 1%--bespoke permits and new permits have 1% limit, but some historical permits might not.

MM noted Veolia recently had a permit varied which added a 1% limit and suggested that as permits undergo variation, they will likely be changed to adopt 1%.

JH noted that every installation permit (larger composting sites) and standard rules permits will have 1% limit as these permits have been subject to a recent review by the EA. Older legacy permits won't have the 1% limit in and will not be subject to routine variation for the foreseeable future (England and Wales) – most of these permits will be classified as “waste operation” permits which are for smaller composting facilities.

JH queried if it would be possible to feed that back to the EA in the TAC?

GK confirmed he would raise the issue with the EA at the TAC and reiterated the need to tackle the issue from both ends (i.e., also pressuring LAs) rather than just with the producer.

JC stated that regarding permit reviews, they have a bespoke permit from registering with the EA 13 years ago. Their site has applied to move to a standard permit and expect to be imposed with a contamination level within this new permit. JC states that their site doesn't have any restraints under the current permit but feel they must listen to the regulator more than the contract and note it's a fine line to ensure the two work together. JC also comments that they do send photos of contamination to LAs, and LAs do seem sympathetic but don't take much action at the household level to educate householders. JC says there is more work to be done and the EA need to speak a lot more openly with the LAs to make sure these things get sorted out.

GK queried if a lot of contracts allow you to vary subject to regulation.

JC said she was not entirely sure but could look through the finer detail of their contract. However, she would hope that's the case because it makes it impossible to service the contract if regulators are imposing limits.

GK recalled a phone call with a LA (Glasgow City Council) trying to place their comingled waste they called 'a bit dirty' (30% contamination). GK stated that's mixed waste, not source segregated, and notes there's a long way to go to get to an acceptable level.

No further comments.

GK encouraged any composters to email him with any specific issues to raise at the TAC. GK also encouraged producers to ensure they are up to date with the Scheme Rules even if they've been on the Scheme for a long time, as rules do change over time and it's good to be informed of any changes. GK also noted that REAL hold useful webinars to help keep producers up to date.

EL reminded producers of the REAL events page which holds details on REAL events, including webinars and other relevant industry events (e.g., REA Organics events).

GK stated that the TAC also requested feedback about any barriers to entry to becoming a PAS 100 producer. GK queried whether producers were hesitant and if so, why?

Producers had no comments.

GK's last item was to discuss remote audits potentially biannually. GK asked if anyone used remote audits during covid and if so, how it worked, if there were any issues or things to be done differently.

JC's sites did undergo remote audits during covid and found it worked absolutely fine. JC would be open either to remote or face to face audits.

GS stated in the chat: "Worked well here - sent documents for review prior".

MM noted that for Veolia, people in the company doing remote audits had to scan and copy approximately 60 documents across to remote auditors regarding batch appraisal after the audit for due diligence. MM said people involved found this very time consuming so would prefer to avoid that scenario.

GK thanked MM and noted he would feed back to the TAC.

6. Updates on the Research Hub

MMG provided updates on the 2023 Project Selection process. Namely, six proposals were submitted for consideration this year (summarised [here](#)). Producers can provide feedback on the proposals via a CCS Producers' Survey. The survey will close on 24th May. MMG also noted that REAL wants Scheme Participants to be involved in the Research Hub, and due to Scheme participants' feedback that the Project Selection process was unclear, the Research Hub had implemented a series of workshops and webinars to improve engagement with Scheme participants. However, the workshops and webinars to date have been relatively scarcely attended by Scheme Participants. MMG then asked for any feedback on Research Hub workshops or webinars. No comments were given.

MMG then provided updates on projects selected in 2021. The project entitled *Evaluation of the potential for the improvement of the Residual Biogas Potential test and investigation of alternative test procedures for PAS110 biofertilisers* (BCS-specific) is projected to be completed in June 2023. The project entitled *Plant Response Test Interpretation and Comparison: Investigating performance of the*

PAS-Specified Tomato Plant Response Test and Spring Barley Test on Quality Compost (CCS-specific) went out to tender in 2021 but received no bids. It was then revised in 2022 (new title: *Plant Response Test Interpretation and Comparison: Investigating performance of the UK Tomato Plant Response Test and German Spring Barley Test on CCS Compost*) and put out to tender again and again received no tenders. REAL are now discussing how to take the project forward in a different way.

MMG then provided updates on projects selected in 2022, titled, *Evaluate possible alternative area-based methods of assessment for plastics (CCS and BCS)* and *How the benefits of applying compost and digestate to soils can be accounted for under the Greenhouse Gas Protocol (CCS and BCS)*. The Project Management Teams for each project have appointed contractors. Contract negotiations are underway.

MMG then reminded attendees that the Organics Recycling Research Library is available for use and contained a total of 140 articles related to composting as of January 2023. Any participants without an account should get in touch with MMG at megan@realschemes.org.uk to request access.

Finally, MMG reminded attendees to fill out the CCS Proposal Feedback Survey by 24th May and to send any thoughts/questions about the Research Hub—and particularly on webinars/webinars—to her.

7. Issues raised with CCS Producers' Representative

Nothing specific had been raised with GK. GK reiterates that if producers have any problems or questions, they can get in touch with him to raise with the TAC (anonymously if preferred).

No further comments or questions.

8. An opportunity to discuss other issues raised by producers

EL clarified that this is an opportunity to raise anything relevant to the issues discussed in this meeting. EL asked if anyone had anything else to raise further to GS's question about the Scheme Rules timeline, which was addressed previously in the meeting.

No further queries or comments were registered.

GP briefly returned to the topic of Scheme Rules timings to state that UKAS estimates one month for the formal review (not yet begun), so Producers can anticipate another month at least (more likely two) for the final new version of the Scheme Rules to be issued. GP notes that there will be transition periods for the new Scheme Rules that REAL will communicate.

9. Session on Compostables

GP provided context about CMCS—it is a Scheme that REAL runs alongside CCS, and REAL is now looking to introduce a certifiable design for compostable bags and liners through CMCS. GP explained that the aim of the session was to gather feedback from producers on the draft design and general feedback on compostables. GP noted there were five questions for feedback, but wanted to begin by first checking which producers accept/receive compostable liners and what processes they run.

GS stated Hope Farm are not accepting compostables.

SA stated Wastewise accept kitchen caddy liners for kitchen waste into IVCS but not open windrows. SA also noted that when the Co-op introduced compostable bags, Wastewise trialled the bags in their IVCS and found they did not break down by the end of the process. SA queried whether CMCS's labelling scheme would take into account whether materials are practically compostable.

GP stated the labelling of products will show they are certified and therefore theoretically should decompose in industrial processes, however recognized that different systems may respond differently to different compostable materials. GP said at this stage, CMCS hasn't considered trials of specific products, for now the focus is on the design to make compostables recognisable in feedstocks.

MM stated that Veolia has 2 IVCS in the South which do accept caddy liners and increasingly so, but do not accept them in open air windrows. MM expressed concern that British standard compostable liners are present at the end of Veolia's 12-week industrial composting process. MM then queried if there will be a method to distinguish between compostable and conventional plastics in sampling regimes.

MMG explained that there is not currently a method for distinguishing between bioplastics and conventional plastics under the Scheme. MMG noted the Research Panel discussed adding this to the Plastic Method project selected in 2022 but it was determined this would widen the scope of the selected project too much. However, this idea could be submitted as a proposal in future as a separate Research Hub project.

MM states that compostables are a concern at Veolia, as customers want to use caddy liners, but their composters would prefer not to take them as they must treat compostables as conventional plastics.

JC stated her agreement with MM's comments. JC also stated their site doesn't take food waste, only green waste in open windrows and noted that their LA works with terraced houses and can't provide bins to individual householders. JC noted that the LA previously wanted to provide liners and that their site was accepting those at one point 18 months ago but found that bags were still present at the end of an 8-week cycle. They spoke with the CB to see if they could do anything about working with what comes out at the back end of the product side of things, but there was not much they could do because the CB can't distinguish plastic from compostables. Even with the compostable label, if the material goes through a shredder and is present in windrow, people won't be able to distinguish if it's compostable plastic or standard plastic. JC noted it was a very tricky issue.

GP summarised producers' comments that it would only be helpful to have an identifiable design and label if products fully decompose, otherwise compostables will continue to be an issue for producers.

GK said it would certainly be helpful to distinguish between conventional plastics and biobags to take appropriate corrective action. However, GK noted that this would not resolve the possible perceptual issues if biobag fragments were allowed to go out and be seen in a field (as they still appear to most the same as conventional plastics). GK states that one could argue that biobag fragments in finished composts are not doing any harm but arguably does hurt the industry if finished composts appear to be contaminated. So, while it would be useful to distinguish between the two materials, this doesn't mean composts containing compostable plastics should be allowed to pass (if they will appear contaminated).

GK also noted that biobags do decompose in Keenan's process, but this may be because their process complies with the EU standard for Animal by-products—70C for at least one hour in IVC with feedstock shredded to less than 12mm in any one plane. GK states they also take in cups and other compostable products too.

GP commented that this marking design and labelling initiative would therefore be most useful for producers like Keenan where the products fully decompose in their process.

MM noted that within Veolia, the internal health and safety team won't let operatives sort commingled food and green waste in reception halls so even if compostables could be easily identified, they couldn't be separated. MM notes he's unsure how it is across the industry, but at Veolia they don't do a pre-sort.

GK responded that Keenan do sort at the front-end due to the level of front-end contamination. GK notes that from a health and safety point of view, their pickers wear a unit on the back of their hard hat which vibrates if they come within 5m of a loading shovel. An alarm also sounds inside and outside the shovel at the same time. GK wonders if health and safety guys at Veolia would find that helpful.

GP checked if everyone shared whether they accept compostables and for what kind of processes.

DF was unable to respond due to having to take another call.

SS's site only takes green waste via kerbside collection.

JH summarised that seemingly only high temperatures, industrial composting processes can degrade compostable plastics.

GK noted if sites are taking catering waste, they have options for different particle sizes etc. If bioplastics remain at the end, perhaps the process doesn't shred it up as much or reach as high a temperature.

Question 1 - What would you find helpful to be able to easily identify certified compostable liners/bags in the feedstock? (Appearance)

GS stated colour.

GK shared screen to show certification mark he has frequently seen and noted that loads of compostable products have the EU certification mark and other certification marks.

GP stated that the image GK is sharing is of the Seedling logo, a European-wide mark for industrial compostables only, which is licensed by a European trade body and issued by CBs.

MM queried whether the CMCS label would duplicate this mark.

GP explained that ideally, the Scheme would work towards streamlining labelling to have just one logo for the UK market. GP notes that the Seedling logo is solely for industrial compostable products and the CMCS logo would indicate either industrial or home composting suitability.

GK wondered whether many compostable products used in the UK are imported from Europe.

GP said that "key players" from the task force group pulled together by the compostables industry have informed the group that their compostable bags/liners products comprise most of the UK market. GP was unsure about the proportions of domestic vs imported compostable products.

JC stated in the comments: "Think it is a really hard one to scope, due to the differing colours and textures of existing plastics."

GP queried whether, apart from colour and logo, there is anything producers might find helpful in terms of design of the bag to identify it easily as compostable.

GK commented that a leaf in the design seems to be relatively universal among other similar logos.

GP stated that the labelling scheme was developed as a one stop solution as many marks and labels are currently used on supposedly biodegradable products with unverified claims. The scheme intends to offer one label for the UK market that is easily identifiable by industry, consumers, and LAs.

GS stated in chat: “Is there any way the bag could be textured?”

Question 2 – What colour(s) do you think would be helpful if they were all manufactured with the same inks?

GS stated in chat: “Not green!”

GK stated it could be difficult to make a change if green is what people are used to seeing and associating with compostables. He further noted that another colour might stand out more but at Keenan, they have trained pickers specifically to look for green materials.

MM stated that while compostables should be easily visible to pickers (e.g., red), this would also make remaining materials easier to see in the field and noted that generally compostables really worry him.

No further comments on colour.

Question 3 - What would you find helpful from a labelling perspective e.g., visible certification marks across the liner/bag? Would you prefer one recognisable compostability certification mark or multiple?

GP noted that some suggestions have included increasing the size, changing the colour so it stands out, and/or the positioning of the marks.

JC stated in comments: “My comment above – Could the design have a constant logo printed all over it, so that if a small piece is found it can be identified whether an intact bag or shredded”?

GP registered GS’s question on whether the bag could be textured and asked to clarify whether this means feel of the material, or pattern?

GS stated in comments: “The feel for a picker to recognise”

GK wondered if texture might be prohibitively costly and stated that a repeat pattern all over would be beneficial.

GP queried whether it would be useful to recognise one trusted mark—whether Seedling or the CMCS mark—or if multiple labels would be okay.

JC, DF, and GK all confirmed that a single label would be preferable/simpler.

Question 4 - What are your views on the draft pattern/design presented on the next slide (vertical brick pattern)?

GP presented a mock-up of bag design which included a vertical brick pattern with certification mark printed within bricks and an instruction box in middle for customers on what to do with the product after use. GP was also considering having brick lines be made up of small text (e.g., 'suitable for composting in commercial facility'). GP then invited feedback on draft design.

GK thought it looked fine but suggested the pattern be printed all over the bag to familiarise people with the mark and stated that small text wouldn't work for pickers but would be more for consumers.

JC suggested more blocks to contain the logo in a larger number of cells.

SA agreed with GK that no one will read the small text comprising the lines but that it might make a difference when picking out small bits of plastic to demonstrate the material is certified compostable.

No further comments.

Question 5 - More broadly, what issues do you currently experience in terms of feedstock acceptance or rejection in relation to compostables? If you don't accept them, why don't you accept them?

MM reiterated that they would prefer not to accept compostables as they don't fully break down but do so because of pressure from consumers (i.e., LAs). MM enjoyed discussion about bag designs but strongly thinks there should be a procedure to identify compostables from plastics in finished composts.

GS stated in chat: "They don't break down enough. Not distinguishable."

JC stated in chat: "Certification body advised not to take them due to not identifiable at the completion of the process".

GS stated in chat: "Also we have seen 'compostable' bags but they have labels on them - standard sticky white with black ink - which wouldn't be compostable".

GP acknowledged that that is a problem.

GK had seen photos of hybrid products with some compostable, some plastic materials, which is obviously unacceptable. GK commented that, regardless of LAs, the compostables industry is massive and therefore, even if a zero-tolerance policy were adopted, there needs to be a strategy to deal with these materials. GK also noted that unless it's more environmentally friendly to produce these than conventional plastics, it would be a missed opportunity for these materials not to be composted.

JH has found there is lots of confusion between plant-based and biodegradable compostables and is not convinced about the difference between the two. JH notes she was speaking to someone recently who said plant-based plastic is recyclable, which it is not. JH commented that if experienced sustainability professionals are confused by these products, the public will likely be as well.

GP comments that WRAP may have also been working on this and will take away this feedback.

GK also noted that many products are vaguely marketed as compostable which they aren't, and it would be helpful if this were clamped down on as well.

GS stated in chat: "Totally agree with Gregor - again market defined products".

10. AOBs

a) Do producers have any ideas/issues they would like to see resolved through research?

MMG explained that REAL wants research proposals to come from producers. MMG reminded producers to consider research ideas early enough to get in contact with Stephen Nortcliff to put together a proposal and asked if anyone had any thoughts on things that they would like resolved through research to discuss now.

MMG noted that one area flagged as a potential research topic earlier in discussions during this forum was the idea to develop a way to identify conventional plastics from compostables. MM confirmed this was definitely worth adding to the Research Hub. MMG also noted that one issue producers have repeatedly raised is stones and suggested that this could be a research topic.

GK agreed that stones would be a 'no brainer' research topic as a stone the size of a fingernail might be the reason things gets held up. GK suggested looking at end markets to determine which growers would have an issue with stones (e.g., potato and carrot farmers leave much larger stones in fields) and suggested that depending on the market, stone limits could be an unnecessary barrier. GK noted part of the specification was specifically intended for agriculture, but the EA wants to see evidence to support any claims. GK didn't think this would be a big project (i.e., mainly desk-based) and stated that any irrelevant barrier should be looked at through research.

MMG reminded producers that Stephen Nortcliff (advisor to the Research Hub) is happy to help producers put a proposal together. Additionally, if anyone is an REA member, REA Organics has worked with members to develop and submit proposals on their behalf. MMG encouraged producers to start thinking about research ideas and reminded producers that they have the option to work with Stephen (who could do much of the heavy lifting putting together the proposal).

b) Would you be willing to host the next sampling workshop?

REAL used to hold in person sampling workshops that follow the same ideas as sampling webinars (moved online during pandemic) and involved a demonstration. REAL wish to hold an in-person workshop but don't have a site or sample material and are in need of a host site.

EL asked if any sites would volunteer to host a workshop. This would require access to a room with a screen and space for 15 people and site access for Tom to do a coning and quartering demonstration. No sites volunteered immediately. EL asked for anyone to get in touch later if they were happy to host.

With no final comments, the meeting comes to a close.

End: 2.30 pm

Actions:

- GK to raise issue of differing acceptable contamination levels at next TAC and discuss further with the EA.
- REAL to consider feedback and suggestions given by producers during the compostables session for the initiative to introduce a uniform design for certified compostable liners/waste bags.
- Producers to consider research ideas discussed (method for distinguishing compostable plastics and stones) and contact Stephen Nortcliff, s.nortcliff@reading.ac.uk, (or Jenny Grant if REA members) to produce proposals for January '24.
- Producers to consider if they could host the on-site REAL CCS Sampling Workshop.