

Compost Certification Scheme Producers' Forum

Minutes and actions from the meeting on 4th October 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
Angela Cronje (AC)	Scott Bros
Douglas Anderson (DA)	FRM (Forth Resource Management Ltd.)
Shelley Stimson (SS)	New Earth Solutions
Jackie Cooper (JC)	John Cooper Recycling Ltd
Stacey Allen (SA)	Wastewise
Luke Embrey (LE)	Newport City Council
Tracey Smith (TS)	Pennys Group Ltd.

Registration

General chat and informal introductions while waiting for all attendees to join the call.

1. Welcome

EL welcomed everyone and gave a brief introduction to REAL and the forum for any new attendees. DA confirmed he was a new attendee. EL then handed over to JH for roundtable introductions.

EL explained the aim of the forum and outlined the programme for the meeting.

JH queried if there were any issues that operators would like to raise later in the meeting. No items were raised for later discussion.

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

GK to raise issue of differing acceptable contamination levels at next TAC and discuss further with the EA.

Actioned. GK explained that some producers are complying with 1% contamination level but some LAs can't achieve this requirement, so these more stringent sites miss out on contracts, which instead go to sites accepting levels as high as 10% contamination. GK noted that the EA is trying to get as many permits in place as possible so composters on a level playing field with the 1% acceptance requirement and composters achieving PAS compliance are not disadvantaged when bidding for contracts, compared to those who are not PAS-compliant.

JC queried whether there has been any consultation with LAs in terms of how they bring procurement in line with EA permitting requirements (i.e., standard rules), as contractors could find themselves in breach of either the EA's requirements or the council contract.

GK responded that the EA is discussing with LAs and some agree they need alignment, though this discussion remains an ongoing challenge. GK reiterates that if LAs aren't required to have contracts specifying low contamination levels, it will continue to be very difficult to get a 'quality compost' output—so, it's important to put constant pressure on LAs and 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.

GP thanked attendees of the last forum for their feedback and explained she'd shared these comments with colleagues at REAL and the compostables industry working group (led by a trade association representing the compostables industry). GP shared that the final design had been mocked-up and REAL is working toward implementation under CMCS, but discussions are still ongoing. GP explained that there would be a meeting the following week that may determine the direction of this work and that REAL may be able to share further updates in future.

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.

MMG was not aware if Stephen had been contacted to discuss these or other research ideas and reminded operators that this option was still available for anyone interested in submitting a proposal during the next Call Period (beginning next January).

Producers to consider if they could host the on-site REAL CCS Sampling Workshop.

EL recapped that REAL was looking to hold in-person sampling workshops this year but need a producer to host it on-site. No producers volunteered following this request. EL explained that REAL will continue with online sampling webinars for the time being and noted there was one such webinar on Friday.

Any questions on the summary paper

EL introduced the summary paper covering Scheme developments sent to attendees prior to the forum. No questions were raised on the Summary Paper.

4. Update on the CQP revision

EL shared a notable update since the forum in May: The EA has agreed to publish an interim resources framework using evidence already available and plans to implement the interim framework by the end of the year. REAL are not aware whether this means the framework will go for consultation by end of year or the final version will be implemented in full. This interim framework allows additional time to complete the risk assessment needed to revise the QPs. Currently, the EA Task and Finish Group are working on the interim framework, focussing on plastic limits and a digestate-related issue.

JH paused to check that attendees understood the premise of the update and open the floor for questions.

AC notes she'd heard that the EA wanted to simplify plastic reporting for digestate and queried whether the current limit was in question.

EL explained the EA want to lower the limit and to simplify the limit for digestate producers but wants evidence to support this. REAL has put together a plastic analysis paper for 2023 (similar to the 2022 report) which looks at Nitrogen content and feedstocks and is now in the process of putting together a proposal for new limits that BCS reps are feeding into.

AC queried whether REAL have data on this to conduct statistical analysis internally. EL explained that REAL has already done this analysis and is now working out what to propose to EA in terms of practicable limits, supported by the analysis that's been done.

JC noted that WRAP mentioned that EA would fund some portion of the QP review under their own financial resource but also understood that the cost could be passed back to people on the ground.

EL explained that the EA intend for the revision to be funded by industry to an extent but is unsure about the full range of funding sourced for the revision. Defra also contributed some funding to the revision process. Additionally, the Hub has confirmed funding for the Risk Assessment project to contribute to the revision.

5. Feedback from the last Technical Advisory Committee

GK explained that the first item to feedback from the TAC was about the item on contamination levels in LA contracts that has been raised. LAs have been put under pressure to improve quality of feedstocks. The EA has said they're speaking to LAs to try to address this and have done some public engagement etc., but there's still a long way to go. GK noted it's slightly easier in Scotland as it is smaller than England, and Zero Waste Scotland has been involved. GK wondered if WRAP could also get involved and reiterated that someone should impress upon LAs their responsibilities.

GK noted that remote audits are not included in the revised Scheme rules but not entirely off the table.

GK commented he also relayed to the TAC the views on compostables taken at the previous forum (overwhelmingly people don't want to accept them) and queried whether this is still the case for current attendees.

AC asked for clarification.

GK explained that, at the previous forum in May, producers were asked if they accept compostables in their processes and most reported that they did not as they found compostable products (e.g., cups, plates, bags) did not break down fast enough. GK highlighted that this has not been his experience and it depends on factors like temperature profile, composting time, etc.

AC commented that in IVCs, these materials seem to break down (with high temperatures, shredding steps, etc.) but in open windrows, they tend to be an issue.

GK also commented that a previous question for the TAC was whether labs should be able to test compostable plastics. GK noted that this could be useful for a producer to know what they've failed on but in practice, it shouldn't matter whether they're failing on compostable plastics or fossil plastics because they all look the same in a field.

JC via comments: 'Yes agreed! Our certification body has advised that we cannot identify compostable liners to non compostable plastics.'

GK also updated that he'd conveyed to the TAC producers' views on compostables. GK noted it's a tricky one for the composting industry as there's a huge market for compostables and companies are increasing sales and public think they're doing the right thing by using compostable alternatives. However, a lot of the time compostables are removed at the beginning of the process and often composters won't accept them so LA's may not allow them to be included in collections.

No further comments or questions were raised in relation to the TAC and the feedback provided.

6. Research Hub Updates and Ideas Session

MMG provided updates on the Research Hub: The Research Library now contains 300+ articles on composting and AD. For the project entitled, *Evaluating Potential Improvements & Alternatives to the RBP Test*, the completed report is under review by the PMT. For the project entitled, *Evaluate possible alternative area-based methods of assessment for plastics*, work is under progress by contractor Solidsense and expected to be completed in 2024. For the project, *How the benefits of applying compost and digestate to soils can be accounted for under the Greenhouse Gas Protocol*, work is under progress by contractor AECOM and expected to be completed by the end of year. Additionally, there is an upcoming workshop series in mid-November to present the initial results of the project and take Scheme participants' comments/questions to feed into the final report.

MMG then reminded attendees about the Hub's process for selecting projects in four broad steps: 1. Call for Proposals, 2. Scheme Participant Survey, 3. Proposal Evaluation, 4., Project Announcement and Tender Process.

MMG then moved to the 'idea session,' summarising several project ideas which had been discussed in previous forum meetings and shared in the recent Schemes/Hub survey.

MMG then asked if any attendees wished to expand on previous ideas or discuss any new ideas. MMG also queried whether there were any barriers to submitting proposals or ways participants could be encouraged to submit ideas.

AC noted that a company she represents produces a topsoil blend containing 5% compost and there's a strong annual customer base for this product. AC notes this could be quite specific to this company, but

it could be useful to have evidence on what would be an ideal mix for this kind of product. Or what's an improvement % might lead to input on the PRT TWG. Some composters in vessel are struggling with PRT results—they're not understanding why they're failing and time lag, feedback, etc. It's something optional that could be gained for clarity on the PRT and to see fit for purpose use of compost. If used in topsoil—this could be an offshoot of the project.

AC noted that the test is tricky because compost is mixed with peat, but this is not a reality for many compost applications so it's a very specialised test, not a real-world test. AC wondered whether the PRT might depend on market. If compost goes to agricultural land, the PRT is less relevant.

AC further queried whether there has been much research on application rates and suggested it might be a longer-term project. Farmers decide how much material to apply per acre and the amount might depend on N-sensitive zones. Could be useful to inform customers of recommended quantities to apply.

MMG replied that the Hub has not undertaken research on application rates thus far.

AC also noted the suggested project on oversize for biomass and queried if there have been any discussions with government regarding different grades of biomass? Power stations (e.g., Drax) have gotten into hot water because they were accused of pellets. Generally speaking, wood from compost operations can't be used for higher grade stuff. It depends on the spec of the plant.

GK noted that composters are familiar with the issues of oversize and the suggestion has been raised before. However, the Research Panel has so far found this suggestion out of scope for the Hub.

GK reiterates that oversize is a constant problem for the industry and suggested that there should be another scheme specifically for it. GK asks GP if REAL has ever considered another scheme for oversize.

GP recalled that there was some discussion at the TAC over whether a QP should be developed for oversize material. Because it has waste status, to achieve end of waste (product) status, a QP would need to be developed. From memory, this item was left with trade bodies to push for with the EA.

AC stated that this might depend on the market. If composters wanted to use oversize for biomass, the material would need to meet the input criteria. AC noted the potential link-up here, to bring the two industries (composting and biomass) together.

DA commented that if there was a set standard, the biomass industry might be more open to using compost oversize as an input.

GP suggested this may be something to raise with REA.

JH queried if PAS111 is for processing wood waste, could this be a way in?

AC commented that the tricky bit comes with source and end markets. If oversize is not an acceptable source for inputs, this won't apply.

JH confirmed that PAS111 applies to waste wood from industrial processes not from composting.

AC also noted that in the processes she works with, plastic would have to be removed from oversize for it to be considered an input for another product.

AC suggested another potential project could be on behaviours around the maturation stage, noting that this is technically required in the composting process, but few composters really do it. The Hub could do research to show the value of a maturation stage (e.g., if it helps more useful fungi grow) and then composters could make an informed decision over whether to do it or not.

AC commented it would also be nice to know if there are composters that do a proper maturation stage, and suggested as a first step, conducting a review to determine whether operators do it or why – without getting into commercial issues. This could then feed into scope for a wider study.

MMG queried if attendees for feedback on the proposal selection process (i.e., any barriers to submitting a proposal and any ways operators could be encouraged to submit their ideas).

AC commented that lots of operators have ideas, but it can be time consuming to sit down and draft a proposal. AC noted she was aware that there was an opportunity to engage with Stephen for knowledge transfer and support compiling proposals. The issue for producers may be not knowing where to start or having the time to sit down and write a proposal.

MMG encouraged attendees to follow up with any other ideas if they came to mind at a later date. MMG further reminded attendees of the next call for proposals opening January 2024 and reiterated that Stephen Nortcliff would be available to support anyone with a research idea who might find it difficult to put down into a proposal.

7. Issues raised with CCS Producers' Representative

GK noted that DA sent an email a few weeks ago around the problem with contractual obligations and contamination levels set by LAs.

GK expressed that for too long 5% has been discussed as an acceptable level (and in some places even higher) and 1% should be the acceptable target.

DA explained that in Scotland there's a framework for garden waste contracts, everyone bids for it, and it has already gone through the procurement framework, but they set contamination limits.

AC thought that the described framework is quite unique to Scotland and noted that for AD, they tried to get contamination lowered to 3% for food waste coming to AD. The problem with the framework is to get the best benefit for LAs screws down for everyone else (cost). Operators have no input even when they did the revision because they're on the framework.

GK wondered where the 5% limit came from, noting that WRAP put together the first PAS100 and 5% was the recognised level in 2005—though PAS was not as widely known at the start. Somehow 5% became the accepted level of contamination and has not yet been widely recognised as unreasonably high. This is routinely an issue for producers due to increased pressure to get below limits for certification, as even the best producer can't meet the PAS requirements if the input material is heavily contaminated in the first place—even if spending loads of money on litter pickers, etc.

GK notes that this puts producers in a difficult position as they must accept bad contracts to remain competitive and win business but accepting 5-10% contamination makes it very difficult to achieve PAS compliance. It's difficult to how else to put pressure on LAs because the government needs to do more.

In Scotland, green/food waste must go through a certified plant to count toward recycling targets, which gives Scottish operators slightly more leverage in LA contracts (which specify certification as a

requirement). But it's still difficult for Scottish producers and even more so in England where producers don't have the same negotiating position.

GK notes producers do not want to be constantly arguing with customers about contamination and charges, etc., nor do they want to be in a situation where they are frequently photographing/weighing contamination as often producers must prove to the customer that the contamination is higher than the level agreed.

AC noted that as regulatory limits have gotten tighter in Scotland and now in England—notwithstanding customers' requirements—at some point, composters must pass the cost on to their customers. AC wondered if this may be a way to get LAs to understand how this feeds back to input material.

GK commented that in Scotland they were in a 5%, contract with Suez and raised this difficulty and found Suez were quite open to a 1% limit. However, wastes taken from southern LAs this summer were highly contaminated but not enough to formally complain/apply charges as its all inspected visually.

JC returned to an earlier point to ask: if the regulator determines the level within standard rules permitting, how can an LA override that to specify over and above the regulators' stipulations? JC also commented that the 5% figure (for allowed contamination in feedstocks) has been distorted in terms of weight vs. volume. 5% by weight is a massive amount of contamination. JC noted that contamination levels could be reduced by simply asking LAs to stick to what regulators require. Further, by cleaning up feedstocks, this may also help to deal with oversize issue.

JC reiterated that LAs must be brought to task by the regulator and perhaps it's worth putting some pressure on the regulator to ensure LA compliance.

GK stated that if no producer accepts >1% feedstock contamination (e.g., send back contaminated loads), the LA might get the message. But most likely another site would accept the contamination.

AC noted that with one contract, they've agreed to a 5% limit allowed but with a 3% limit on plastic and up to 2% can be stones and plastic.

GK commented that ultimately, it's not the LA that puts contamination in, it's householders.

AC commented that some LAs are now charging for green waste collections as they want this waste stream to be commercially viable. However, once they start charging, this might change the mindset as householders may think that if they're paying for this service, they can put anything in the bin.

GK noted that in terms of LA engagement, his kids are always putting the wrong thing in the wrong bin and once got a sticker on the bin explaining why their bin wasn't lifted. This system works well for people who have made a mistake and, in this case, one time not having the bin lifted may be enough to change behaviours. This approach could help LAs to recognise it's somewhat their problem and they cannot simply lift bins and then pass the problem onto others.

8. An opportunity to discuss other issues raised by producers

AC raised a point on behalf of Emma Cheetham (EC), noting that Eurofins had taken over ATL. AC explained that EC had a failure on stones and when sample was sent for re-test, the lab tested for all PCs, rather than stones only. Eurofins told EC that they had to do a full PC test rather than stones, however stones are a standalone parameter, not part of a larger PC test.

GP explained she'd discussed with Tom Aspray. GP had not checked with the other labs, but REAL's view is that the lab is probably right. The PC&S test method is one method that covers both parameters – the lab would be conducting that test for everything. Also, the labs might not be able to separate parameters because it's the same method and they might not be able to identify material as a stone, but a piece of glass.

GP queried whether the testing was for certification purposes? AC confirmed this.

GP explains that if the test was for R&D purposes, these parameters might have been reported individually but for certification they would be reported together.

GK noted that stones are technically a separate parameter with separate threshold so should be reported on separately, per the wording in the PAS.

AC expressed the view that it's the test method at fault not the standard.

GK commented that following a failure, a producer would request the specific parameter to be retested. AC agreed, noting that if a site fails on E. coli, the site wouldn't retest for all pathogens.

GK reiterates confusion regarding retesting for PCs, noting that if a site fails on stones, the corrective action would be for stones. Further, if upon retesting, the producer failed for a different parameter the second time, this creates conflicting results. This raises the question of which result to trust if there are inconsistencies.

AC noted that if the producer did have conflicting results, they might not have to report this. If the sample failed on plastics, it would be sensible to retest for both but not vice versa. It would be useful for the CBs to look into from an auditing perspective.

GP asks if GK would be willing to bring this item to the TAC to have open discussion with the labs/CBs. GK confirms he is happy to do so.

10. AOBs

For the first AOB, EL explained that REAL collects info on sites taking compostables and shares information with interested parties. EL asked if any attendees take compostables and would permit REAL to share this information.

GK commented that his site takes compostables.

AC's site does not explicitly say they take compostables, but they do accept them. However, jury's out as compostables represent a smaller proportion compared to other materials that come in.

For the second AOB, EL reminded attendees that the 2023 Schemes and Hub survey is closing today, noting this is a great way to share any thoughts about the Scheme and RH and that REAL try to prioritise this feedback.

For the third AOB, GK raised a question about an email received from NSF about renewal. GK explained that the email was received 3-4 months in advance of expiry. 1-3 months in advance would be ideal for anyone worried about not getting non-conformance in advance.

GP explains that this early reminder is partly for producers' benefit, as in the past when the audit was booked in 1 month before certificate expiry, it may not have been long enough for some producers to address any NCs raised. It's also a requirement of the Scheme rules that the audit shall take place approx. 3 months before expiry, but it's not always adhered to. CBs have been sending reminders early to give everyone involved (CBs, producers, etc.) enough time before end of validity period.

GK states that if all the info is there, it's just about scheduling the date the auditor comes out as all the documentation can be checked before. And the audit itself is more about if there's anything they might see on the day that the auditor doesn't like.

GP explained it depends on the CB and advised producers discuss with their respective CBs.

AC commented that the longer timescale also gives auditors time. However, also noted that it's tricky as their site only has 2 test results back for 12-month period; they won't have half results by time of audit.

AC also noted that things have slipped later and later over covid and commented that Farzana (auditor) was struggling to fit in all the sites in the time.

GK then queried if it would be possible to have an audit where the site didn't have test results for all necessary parameters. AC confirmed but noted the CB was practical in understanding timescales (e.g., for the PRT test given it's a lengthy test).

For the final AOB, EL explained that REAL have engaging with the growing media sector via a community interest group called Sizzle. They are working on a project called Enrich the Earth which looks into peat alternatives for growing media. REAL are trying to collaborate with them and hope the project will result in some useful resources. EL noted that Sizzle may request some site involvement for the project and REAL will keep producers updated if/when that happens.

End 2:00pm

Actions:

- Producers to consider research ideas discussed (method for distinguishing compostable plastics from fossil plastics; whether stones in compost are a problem for all end markets) and contact Stephen Nortcliff, s.nortcliff@reading.ac.uk, (or Jenny Grant if REA members) to help produce proposals for January '24. (Ongoing) (Note: to reduce barriers to sharing research ideas, producers can simply provide Stephen with a short summary of their idea)
- REAL to provide update on CMCS compostables labelling/design initiative at the next forum
- REAL Research Hub to consider research ideas raised in meeting
- Producers to raise the issues around markets for oversize and the potential for development of a QP for oversize with trade bodies
- Producers to contact Megan with any additional feedback on the Hub proposal process (e.g., any barriers to submitting proposals, and suggestions for improving the process)
- GK to raise physical contaminants and stones reporting issue for discussion at TAC