



Compost Certification Scheme Producers' Forum

Minutes for the meeting on 12th May 2021

Online

Attendees:

Gaynor Hartnell	Chair
Georgia Phetmanh	REAL
Molly Rogers	REAL
Gregor Keenan	CCS Producers' Representative
Georgina Smith	Hope Farm
Ben Dyson	Earth Supply
Rob Harris	FCC Environment
Emma Cheetham	MEC Recycling
Lee Palfryman	The Greener Gardener
Rob Clark	SUEZ
Angela Cronje	Scot Bros Environmental Services
Reinis Purvins	Veolia
Philip Gray	Gray Composting

1. Welcome and Introductions

GH welcomed the group and initiated a roundtable introduction to the meeting. She asked producers for issues they might want to raise under agenda item 8. GP had an item on compostable packaging.

All attendees were happy with the minutes of the previous meeting.

2. Actions from the previous meeting

GP and MR provided updates on actions not covered during the meeting.

- *AC to provide list of laboratories to REAL to consider contacting regarding approval.*

GP confirmed that AC had provided a list of university testing/research facilities. REAL had contacted them all by email and had contacted a commercial laboratory that was also brought to REAL's attention, but none of these laboratories have expressed interest in becoming approved to date.

- *REAL to consider ways of gathering feedback from departing scheme participants*

MR reported that REAL was designing an open survey for departing scheme participants which will be issued once the certification bodies report a withdrawn certificate through the monthly reports to REAL. GH suggested that it could be useful for a producer to review it, and GK volunteered.

ACTION: REAL to send draft survey for departing scheme participants to Gregor for comments

- *EC to send MR email addresses of operators who are not receiving scheme communications*

EC provided MR with email addresses following the last forum and this was investigated. EC reported that she also forwards all comms to producers. REAL investigates any comms-related issues raised.

- *REAL to aim to hold back-to-back meetings with the REA next year post-pandemic*

GP noted that ideally these meetings will be held in winter this year and in person, but this will be confirmed soon. AC asked for timings be taken into consideration as this may not work if producers need to travel far for the meeting, and if the meetings are too early or too late, overnight accommodation would need to be sorted. Meetings at sites work well so this should be considered. Additionally, two consecutive days of meetings might be too much, and the logistics might not work.

ACTION: REAL to consider logistics of holding back-to-back meetings with the REA before deciding on format of future producer forum meetings and consider on-site meetings/site tours

3. Updates on the CCS

MR reported that as of 7th May 2021, there were 178 certified processes on the CCS. 141 were in England, 19 in Scotland, 12 in Wales, and 6 in Northern Ireland. There is approximately ~3.8 MT per annum of input material processed at certified sites. 150 processes are supplying to agriculture and soil-grown horticulture, 78 to domestic or professional horticulture, 72 to land restoration, and 4 to forestry. Since this year, there have been 4 CCS applicants, 0 suspended certificates, and 7 withdrawn certificates.

GP gave an update on the 2020 cost comparison analysis, which looks at the cost of certification under the CCS vs deployment of compost under waste management regulations in England. On average, a producer would pay £6300 for certification to renew certification and the spreading of waste would cost approximately £35,600. In the updated paper, the annual Research Hub fees were also included. The results were verified by a consultant and provides an indication of average costs.

Producers noted that this analysis does not take into account some costs involved for achieving certification e.g., employing litter pickers to remove contamination.

ACTION: REAL to consider adding note in cost comparison document to inform that some associated costs (e.g., litter picking) are not included in the calculations

[Understanding Test Results Webinar](#)

This webinar has been designed to help producers interpret test results. It includes sections on the minimum quality criteria and corrective actions, scheme tests in detail, how you can have confidence in test results, approaches for interpreting test failures, and scheme developments related to testing.

The trial webinar was offered to attendees of the sampling webinar in November 2020 and the first webinar took place in March 2021. REAL received positive feedback from attendees and another webinar is scheduled to take place in the autumn.

AC queried if REAL provides suggestions of corrective actions. GP clarified that REAL do not want to act as consultants, so recommending specific corrective actions to producers is avoided.

SQCS Workshops

MR noted that REAL ran two workshops last year on the Safety and Quality Control System (SQCS) requirements in PAS 100:2018 (in August and September 2020), which were delivered online by a HACCP expert. They are comprised of interactive sessions and individual exercises. REAL received positive feedback from the previous workshops and held two more in April and May 2021. A guidance document has also been disseminated to attendees, which provides an indication of what is expected for compliance with the SQCS requirements of BSI PAS 100:2018.

Sampling Guidance

- *Action from last meeting: REAL to discuss and raise issues regarding delayed couriers with approved laboratories*

REAL updated the CCS sampling guidance in 2020 and the requirements around sample transit times were removed. REAL recognised the current situation with Covid-19 and in this guidance, now instructs producers to use a 24-hour courier for pathogens (unless in extreme geographical locations where 48-hour is recommended) or a 48-hour courier for samples not scheduled for pathogens. There are no specific clauses in PAS 100 related to transit time. If there are delays, the labs have been instructed to contact producers to ask if they wish to proceed with testing. The sampling guidance was issued in December and the sampling webinar content has been updated to reflect the current version.

AC asked whether there were set timeframes for laboratories to carry out testing and GP confirmed that these requirements are set out in the Laboratory T&C's. A producer also commented that one of the laboratories had misinformed them of requirements within the sampling guidance.

ACTION: REAL to ensure Approved Laboratories are aware of guidance to producers re courier selection

Scheme Rules

REAL reviewed the CCS Scheme Rules and initiated a revision process in 2020, which involved a consultation period. Following this revision process, version 9 of the rules was published in March 2021 with a two-month transition period. The key changes to the rules were the removal of the Quality Assurance certification category, and addition of reference to the EA's QP review outcome. Other

changes include the requirement to notify the certification body on receipt of a product complaint and once the investigation has been carried out.

The audit checklist was updated with the rules and has been in use since the 1st of May 2021.

Audits during Covid-19

REAL hold regular meetings with the CB's and environmental regulators, where there are discussions around the agreement in place for remote auditing, and whether this should be extended or changed. A third extension was agreed earlier in 2021, which allows for remote audits to continue to take place. Remote inspections only take place where the auditor or site cannot comply with government guidance, there are local or national lockdowns or issues affecting the ability to carry out a physical audit.

The current positions are in place in England until 31st May and in NI, Scotland, and Wales until 31st July.

Laboratory Approval Scheme

The laboratory T&C's were reviewed in 2020 and the review involved the CB's as part of the Laboratory Approval Scheme (LAS). There was an overhaul of the letter agreements in place with each of the labs, which include the T&C's. Technical changes introduced into the T&C's are introduction of a maximum timeframe for addressing non-conformances with corrective actions (input from the CB's), and changes to requirements for labs re sample couriers. Version 5 of the T&C's is available on the CCS website.

All three labs were re-appointed against this version of the T&C's and they will be audited later in 2021.

PT Programme

GP informed that REAL is looking to develop a laboratory proficiency testing (PT) programme for scheme specific tests. Last year, an Expressions of Interest document was circulated to help assess the viability of developing and running a PT programme. Some interest was expressed by a few organisations and REAL decided to proceed to an open tender. However, the tender process was concluded in February after REAL received no full proposals/submissions. There have been internal discussions to explore how to proceed now there is no external contractor available to develop and run this programme.

EC questioned whether if the laboratories have been non-compliant, do they admit if they get it wrong? Should REAL be informed of this or the CB? She reported that a site had a high heavy metal value and after questioning this, the lab confirmed they had made an error. Should REAL be informed of this? GK also reported of this happening to his site, and when the laboratory checked the result, they had made an error. GP clarified that this should be reported to REAL through the CCS lab complaint procedure. Producers agreed that the laboratories should have quality control checks on their results.

ACTION: REAL to consider a process for being alerted to testing-related issues at the laboratories (from either the laboratories or producers)

Plant Response Test Technical Working Group

MR informed that an action from the TAC meeting held in October 2019 was to set up a Technical Working Group to focus on issues raised at the CCS Producers' Forum around the plant response test. The PRT TWG was formed in 2020 and is a sub-group to the TAC. The PRT TWG will define the aim(s) of the test and the appropriateness of the test method for the scheme. It is comprised of REAL, two compost producer representatives, and two representatives from the EA and SEPA.

There have been two meetings of the group. In the second meeting, REAL presented analysis on the failure rate of the test (2020). There was a 100% pass rate for weed plants after 28 days and tomato plant abnormalities, 97.5% plant germination pass rate, and a 96% pass rate on plant top growth. Despite the lower-than-expected failure rate, the group submitted a research proposal to the Research Hub which considers using chemical tests in the case of failures to enable release to restricted markets. The group awaits the outcome of the Research Hub's Research Panel evaluation meeting.

REAL produced a paper detailing REAL's work surrounding the Plant Response Test and the formation of the Plant Response Test Technical Working Group, which was circulated the week prior.

GK commented that producers want a quicker test turnaround. If REAL could look at other tests to provide more information, it would be welcomed, as producers do not know what corrective actions to take. Despite having a low failure rate, if a producer fails one or more PRT tests a year, the implications are considerable. PG questioned the appropriateness of the test for an agricultural market and suggested that it should be up to the customer as to whether the product was suitable for them, based on its test results. GK wants the methodology of the test changed to make it a more manageable process, as there is frustration amongst producers with the time that it takes to conduct the PRT.

- *Action from the last meeting: REAL to consider inviting other individuals to join the PRT TWG to support producers.*

GP reported that this had been discussed but it was decided there is no need for other individuals to join, as the direction of the group discussions have changed. There is also an opportunity for producers to discuss the issues outside of the meeting, but the group should be kept small for optimal discussion.

- *Action from the last meeting: Producers to consider compiling a list of questions on the PRT to put forward to REAL*

No list was received.

- *Action from the last meeting: Producers to consider meeting to discuss information gathering for the PRT*

GK reported that this had happened before the second meeting of the group.

- *Action from the last meeting: REAL to consider sharing the PRT method with producers*

GP informed that the test method is now owned by REAL. It can be shared but REAL wants to make sure it is not misused or undermined, and therefore needs to understand how and for what purpose it would be used. If anyone would like to obtain the method, they can request it from REAL.

4. Updates on the Research Hub and MDWG

Research hub Update

MR reported that the first project of the Hub 'To develop a Research Library for the Organics Recycling industry' was live and open for users. As of 10 May 2021, the Research Hub had received 42 'Request Access' submissions and The Hub was in the process of developing a 'Access Request submitted to the Research Hub's Research Library' paper, which details the cost of access to the library for non-CCS/BCS participants. The content of the Research library is being reviewed by NNFFC on a quarterly basis, to routinely identify and link new research into the Research Library. Furthermore, to monitor use of and traffic through the site, user statistics are being reviewed and reported upon quarterly.

The second project of the Hub is titled 'To develop a 'data pack' on the properties, characteristics, and content of digestate that will provide context for the development of new uses of outputs from Anaerobic Digesters'. Following a competitive tender process, Solidsense Ltd have been contracted to carry out the work. Solidsense Ltd are subcontracting AquaEnviro and Cambridge Eco Ltd to carry out specific elements of the project. The work is underway and will be completed in November 2021.

A call for research ideas was circulated on 11 January 2021 and ran for six weeks. Five Research Project Proposals were submitted in total, from both operators and the wider industry. Stephen Nortcliff, Advisor to REAL, liaised with the submitters of the project proposals to obtain additional details where necessary. A survey was live at the time of the Forum and was circulated to operators to gauge their opinions and collect scores on the submitted research ideas. The Research Panel will meet in two weeks' time to evaluate and shortlist the research ideas, considering the survey results, and again in July to select at least one project to be taken forward for commissioning.

Forum attendees flagged that they had not received the survey from the Hub or found it in their junk folders. MR will investigate this comms-related issue.

ACTION: REAL to investigate why Research Hub emails are diverting to junk folders

MDWG update

REAL's MDWG had planned to hold a workshop for industry to discuss the CQP and ADQP reviews. This then became an industry wide event held by REAL and the trade bodies, and REAL held MDWG teleconferences to decide on the group's focus. Since the last forum meetings, there have been two teleconferences of the MDWG. The first was to explore whether there were any immediate market-related issues to address. During the second teleconference, the webinar had taken place, so key updates from the webinar were shared and there was exploration on what evidence the group could gather or collate to support changes to the QPs. One area explored is the collation of evidence from

Scotland to support the addition of animal bedding as a market in England/NI/Wales. AC advised that ABP compost cannot be used as animal bedding and there needs to be clear limitations on this.

In terms of marketing the product in horticulture, AC commented that the PAS logo is not visible on the bagged compost in retail. PAS compost being sold in B&Q does not have a clear label on it. The labelling is too small at the back of the bag, and so it might be worth changing the requirements for this.

The MDWG met again in May and agenda items included an update on the QP reviews, compost use for animal bedding, and composting oversize. The QP reviews were discussed in depth during the meeting, and it was noted that the REA are holding an event for industry on the CQP revision on 9th June.

At the meeting, engagement within the growing media sector was also discussed. The group are considering the introduction of a disclaimer in supply documentation that clarifies the intended use of the product, which is agreed with the purchase. Compost oversize was kept on the agenda to revisit in future meetings, but the MDWG considered that it is not the right time to push this, as the Environment's Agency end of waste panel is currently closed.

5. Update on the CQP review

GP provided an update on the CQP review. The QP review outcome was published in December on the government webpage and the review outcome was that it needs revising. The current issues outlined in the QP review outcome were listed in the PP slide.

The EA are happy to support a revision process, but industry will have to pay for their time. There is an estimated cost of £20-25K per QP and the revised documents will be renamed 'Resources Frameworks'. Assuming a revision process goes ahead, the QP can continue to be used until that process is concluded, and the EA will support the transition. The revision process will have a 'task and finish' group to advise, but final decisions will rest with the EA. REAL expects to be part of the group. The EA have since confirmed that following the commitment for funding, the QP will not be withdrawn at the end of May.

REAL's work in relation to the QP review(s) includes a call for evidence submission to the EA, discussions and evidence gathering with the MDWG, letter to the EA outlining a funding proposal and request to sit on the task & finish group, discussions with other UK environmental regulators, Research Hub commissioning research projects which may inform technical discussions and decision-making, and engaging with Defra on implementation of the EU Fertilisers Regulation.

AC noted that the hourly rate for the EA widened a few eyes, but this includes the technical and legal team for the EA. There is industry-wide relief that the money has been raised for the review and there must be progress being made to drive the revision forward.

6. Feedback from the last Technical Advisory Committee Meeting

GK provided an update from the last Technical Advisory Committee meeting.

There was a request for slides from the sampling webinars to be disseminated widely, but REAL had clarified they encourage producers to attend the 45-minute-long webinars instead, to engage in useful discussions. It was also clarified that the SQCS template is only being disseminated to producers that attend the SQCS workshops. There had been lengthy discussions with the CB's and HACCP expert (workshop leader) on a potential template. The final guidance document is not a template but a PDF document which provides an indication of what is expected in the SQCS.

GK noted that it is important for producers to make sure they are up to speed with the Scheme Rules and the implementation of changes. He questioned why the regulator must be notified in the event of a test failure. In his opinion, this is not necessary. GP clarified that this point was in relation to discussion at the TAC around the BCS rules, relating to digestate already dispatched before results are received. There is a requirement in PAS 110 to notify the regulator if the material has already been dispatched.

GK commented that digestate and compost are similar products and have similar end uses and questioned why there are some different requirements in the standards. AC noted that there is no growth test in the BCS as digestate only goes to agriculture. She suggested this is a good argument for not requiring the PRT on compost going to agriculture. GK questioned that if all producers agree on this, what are the next steps to take this forward? This will be taken to the PRT TWG.

Another discussion was around 'Hub and Satellite' model facilities. These are managed as one process, where composting takes place at different sites at different times. There was a question around whether sampling would be representative of one process. GP noted that the outcome of this discussion was that under the scheme, this is a single process sampled in accordance with PAS 100 as written. Though this issue and discussion has been recorded for further consideration during the next PAS 100 review.

GK called for suggestions and comments to take to the PRT TWG.

GS questioned if there had been further discussion about batches sitting in a field for over 6 months and if there is a requirement for the material to be retested. There are questions around the integrity of compost being compromised if it sits on site for a long time. EC believes that this was more of a visual assessment of the compost, assessing for weeds etc. She was not aware there was a formal requirement for re-testing. There have been questions from regulators suggesting that there may be situations when the compost could return to waste. AC noted that if a producer had compost sitting on their site waiting for dispatch, it would be the same as sending it to agriculture and the farmer having it sat on his farm. Previously, producers would have to explain to customers that the product is still compost when it sits in a pile. When it has left site and gone to a customer, it is for them to spread as and when they require.

7. Issues raised with CCS Producers' Representative

There was a conversation at the MDWG meeting around declarations and third-party reselling and whether there should be a declaration saying that the product should not be split and resold. There should not be any PAS 100 conformity complaints if the material has been sold to a third party. There have been complaints about compost sold in bags, which have been traced to the producers who do not

bag the product up. EC commented that there should be a quality specification or a tick box on the website which outlines all requirements. This way, all parties can be ensured that a requirement has been met and it is no longer in control of the producer.

ACTION: REAL MDWG to consider how to improve marking/labelling on products (containing PAS 100-certified compost) bagged by third-party suppliers

8. An opportunity to discuss other issues raised by producers

CMCS

GP introduced the Compostable Materials Certification Scheme (CMCS) which REAL manages. This Scheme certifies both home and industrially compostable packaging/non-packaging products and provides a service for the assessment and labelling of these materials. REAL are developing a labelling guidance document for these products, targeted at consumers, local authorities, and producers, and are considering how to engage with producers to inform the guidance. GP took the opportunity of the forum meeting to ask the attendees some preliminary questions:

Do you accept compostable packaging?

Producers do not typically accept compostable packaging in open windrow composting but accept it into IVC. Cups do not break down in the windrow, but packaging disappears in IVC.

What do you receive in feedstocks in terms of compostable material?

There is an acceptance of bags but not cups etc. as they are compacted, and the shredders do not break them up – they need to go through a more intense period of composting.

What can you identify?

Tableware, bags, cups, gowns from hairdressers.

Producers asked if there are different requirements for home compostable and industrially compostable products. GP informed that there are different standards but the requirements under the scheme are that home compostable products must be independently certified for industrial compostability.

Issues with products?

Producers reported that some products don't break down, especially during IVC processing. GK reported that a key issue is identification of compostable packaging. A lot of packaging goes to AD and landfill. GK asks for photos and noted that a lot of people do not identify compostable items correctly. It should be part of certification that it is clearly labelled compostable and by the same token, nobody should be allowed to make a green bag that isn't compostable. GK does not accept compostable nappies. He noted that there are a few things where the line is drawn, mainly because staff pick through feedstock themselves. If there were no contamination problems, people would not need to be there.

Across the UK, there are companies selling compostable materials when there is no outlet for it, and it ends up being wasted. If there is no bin on the street for compostable material, then it will go to landfill. There needs to be wider knowledge on biodegradable vs compostable.

Have producers been asked to trial products by producers of materials or consumers?

AC noted in the early days this was very specific communication. This was before the compostable packaging route was well known.

Suggestions for easing identification?

Bag manufacturers should only use green if they are compostable and the bags have clear labelling. If the compostable logo is compulsory and has to be a certain size, it would make a massive difference.

EC found during the last year there were contamination issues arising from green waste bins. One site had to make the decision to stop producing their 0-30mm grade as they were struggling to meet the PC level and were investing in higher tech front end equipment and staff to help pick out contamination. She asked if REAL/producers are aware of this? Producers agreed that front-end contamination is a problem and the most effective way to solve it is sorting through cleaning feedstock at the front. GK instructs managers to talk to local authorities if they think that they are not doing enough, as education is important, and this is an ongoing issue. Cigarette butts into green waste is a big problem. The term 'green waste' has been discussed with local authority. Should this be called organic waste? AC noted that her council provides a leaflet that explains what can go into recycling. There should be a note to remind the public of what can and cannot go into each bin to educate them.

The issue of the stones limit was raised by EC, and she commented that when there is a revision to PAS, this should be considered. All operators felt that the stones limit was not appropriate for compost destined for the agricultural market, and they expressed that it is hard to make necessary changes to PAS. This issue may be raised by GK at the TAC for attention to this but also discussed with GH.

ACTION: REAL to consider asking producers to review the CMCS labelling guidance

ACTION: GK and GH to discuss GK's concerns over producers' / scheme participants' ability to achieve changes they want to see in the scheme

ACTION: REAL to circulate TAC meeting minutes to producers

END

ACTIONS:

- REAL to send draft survey for departing scheme participants to Gregor for comments
- REAL to consider logistics of holding back-to-back meetings with the REA before deciding on format of future producer forum meetings and consider on-site meetings/site tours
- REAL to ensure Approved Laboratories are aware of guidance to producers re courier selection

- REAL to consider a process for being alerted to testing-related issues at the laboratories (from either the laboratories or producers)
- REAL to check whether the Environment Agency could introduce new testing requirements/additional tests in revised QP
- REAL to investigate why Research Hub emails are diverting to junk folders
- REAL MDWG to consider how to improve marking/labelling on products (containing PAS 100-certified compost) bagged by third-party suppliers
- REAL to circulate TAC meeting minutes to producers
- REAL to consider asking producers to review the CMCS labelling guidance
- GK and GH to discuss GK's concerns over producers' / scheme participants' ability to achieve changes they want to see in the scheme
- REAL to consider adding note in cost comparison document to inform that the associated costs of litter picking have not been included in the calculations