



Producers Forum Meeting Minutes

Monday 19 October 2020

Online

Attendees:

Georgia Phetmanh	REAL
Molly Rogers	REAL
Olivia FursseDonn	REAL
Gaynor Hartnell	Chair
Lucy Hopwood	NNFCC
Georgina Smith	Hope Farm
Jo Fitzpatrick	Material Change
Emma Cheetham	Willen Biogas
Rob Harris	FCC
Lee Palfreyman	The Greener Gardener
Philip Gray	Gray Composting
Gregor Keenan	CCS Producer Representative
Richard Lynas	SUEZ
Sarah Manwaring	Earnside Energy
Angela Cronje	Scot Bros

1. Welcome and introductions

GP welcomed all to the forum and introduced the CCS.

2. Updates on the CCS

- *REAL to consider comparing trends with figures in annual reports for market data*

This will be included in annual reports going forward (2020 onwards).

- *REAL to record practical element of the sampling workshop and make the video available as a resource*

REAL have not been able to hold sampling workshops due to COVID, but when able to do so, will record the sampling element of the workshop.

- *REAL to explore whether the sampling webinar should be recorded in the future and made available as a resource*

EC attended a sampling webinar and sought access to the slides afterwards. EC intended to share the information from the webinar with sites who have not attended. MR clarified that the slides would not be shared with attendees, but discussions within REAL were ongoing regarding copywriting the material. Producers are encouraged to attend the free sampling webinars, which are 45-60 mins long, as they provide a platform for discussion amongst producers and the content is kept up to date. The webinars have been well received by Producers and REAL has received feedback that they are a very good and time efficient method of training to update producers on rules and processes. The webinars have been valuable for improving engagement between producers and REAL.

- *Operators to propose to REAL a list of universities or laboratories to contact to invite them to apply to become approved laboratories for the scheme*

REAL had not received any suggestions from operators directly but have been in contact with a few Universities in the past and there have been some discussions with other facilities. If Producers have any suggestions, REAL would welcome getting in contact. AC suggested Rothamsted and Cranfield who have done compost testing and have these facilities. University of Central Lancashire also have a waste management department that could be interested in testing for the Scheme.

Action: AC to provide list of laboratories to REAL to consider contacting regarding approval

- *REAL to consider whether to hold one or more online Forum meetings*

From next year, one meeting will be held online and one in person.

- *REAL to include an agenda item for checking the previous meeting minutes for accuracy at the beginning of each meeting*

No comments on the minutes.

Action: REAL to add agenda item for checking minutes accuracy for the next forum meeting

Scheme Status

MR reported that as of October 2020, there were 177 certified processes on the CCS. 138 were in England, 21 in Scotland, 12 in Wales and 6 in Northern Ireland. There were approximately 3.8 million tonnes per annum of input. 150 processes were supplying to agriculture and soil-grown horticulture, 73 domestic or professional horticulture, 66 land restoration and 3 to forestry. Since the beginning of 2020, there have been 8 applicants to the CCS, all of which have now achieved certification, 2 suspended certificates, and 6 withdrawn certificates.

Operators present at the Forum questioned if REAL should carry out an exit survey, to find out why producers have left the scheme. GP clarified that this information comes from the CB's in the monthly reports which provide a reason for withdrawal. EC suggested that sites may not tell the CB why they have left but if REAL got in touch as a separate body, it might yield more feedback, and she felt it would be useful to understand why they left or transferred to another certification body.

Action: REAL to consider ways of gathering feedback from departing scheme participants

Revision of the CCS Scheme Rules

Version 8 of the CCS Scheme Rules were reviewed, and draft Version 9 was issued for consultation on 14th August 2020. The key change can be found in section 4.2, specifically in relation to the 'Quality Assurance' category of certification. Draft version 9 was issued for consultation to all scheme participants, TAC members, CB personnel, and laboratory personnel. The deadline for consultation responses was 25th September 2020. REAL will provide a written response to the consultation, which will be made publicly available. Version 9 will be effective from January 2021.

CCS Annual Report

The fourth annual report for the CCS was published, providing an overview of the scheme and summary of scheme developments in 2019. In summary, there were 182 certified processes and approximately 1.96 million tonnes of quality compost being produced under the CCS by the end of 2019. The report also presents an overview of the Biofertiliser Certification Scheme and includes the Research Hub 2019 Annual Report.

Action from last meeting: REAL to aim to include information on the proportion of sites with waste management licences that are certified under CCS

In May 2020, 100% of sites with waste permits and 29% of sites with waste licences in Northern Ireland were certified through the CCS. In Wales, 50% of all bespoke sites were certified through the CCS. In July 2020, 50% of sites with WML and 80% of sites with PPC permits in Scotland were certified. In England, 47% of all sites with biowaste treatment sector permits covering composting as an activity were certified.

SQCS Workshops

REAL held two workshops for producers in August and September on the Safety and Quality Control System (SQCS) requirements in PAS 100:2018. The SQCS workshops provided a platform for discussion around the implementation of the SQCS and compliance with HACCP requirements. The workshops were held by REAL and delivered online by a HACCP expert and were comprised of interactive sessions and individual exercises. Producers have provided feedback to REAL that the workshop was very useful and provided a lot of opportunity for discussion.

Action from last meeting: REAL to consider sharing SQCS standard template with all operators when developed

There are ongoing discussions between REAL and the CB's regarding the template. REAL aims to circulate the template with producers outside of the workshops as soon as it has been finalised. This template is not obligatory for Producers to use but will be an available guide.

Scheme Participant Survey

REAL ran a scheme participant survey from 16th – 30th September, which will help assess scheme satisfaction amongst producers and prioritise areas for further development. It was devised to contribute to compliance with the requirements of ISO 9001:2015. REAL has been assessed and certified to ISO 9001. The survey was comprised of questions on overall Scheme satisfaction, the CCS Fora and on the CCS certification process. The survey also gave producers an opportunity to comment on their experience of the CCS and suggest areas for improvement. REAL will use the survey results to inform the direction of future work and meetings. The response rate for the survey was approximately 12% and REAL is analysing the survey results.

PT Programme EOI

An Expressions of Interest (EOI) document has been circulated, which has been designed to help REAL assess the technical feasibility and financial viability of developing an independently run proficiency testing (PT) programme for the scheme specific methods. The document asks several questions, the answers to which will enable REAL to determine the feasibility of rolling out a PT programme. If one or more responses to this request for EOI suggest that an independently run programme is both technically feasible and financially viable, REAL will proceed to an open tender process.

Plant Response Test Technical Working Group

The Plant Response Test Technical Working Group (PRT TWG) is the working group, facilitated by REAL, to provide producers and the environmental regulators with the opportunity to discuss specific issues that producers experience with the plant response test, specified in PAS 100:2018. The PRT TWG has been set up as a sub-group to the CCS TAC to provide a platform for further discussion on this specific topic and will report to the TAC.

The group met for the first time on 8th September and agenda items included an overview of the Plant Response Test method and agreeing the Terms of Reference. The attendees of the first meeting of the PRT were REAL staff, two producer representatives, two Environment Agency representatives, and two SEPA representatives. There will be a catch-up teleconference for the PRT TWG in November and the next face-to-face meeting will take place early next year.

GK expressed that the test is not fit for purpose and proposed changing the test as a suitable course of action. He acknowledged that identifying an alternative test would require research and consultation. AC commented that this test is market driven and is not very relevant to the market that compost might be supplied to. GK stated that the test is not suitable for agriculture. He questioned what needs to be done to push things forward. GK felt that amongst the group, including the regulators, the test was not fit for purpose.

Producers questioned where the 80% pass rate comes from and why there cannot be two different pass rates with one for agriculture and one for growing media. Producers noted that they have been asking for a new test for years and no one is able to explain where the origins of the test came from. A failure in the test does not mean its unfit for agricultural use. The test must be appropriate for the product and must be fit for purpose. GK suggested Emily Nichols should be involved but REAL does not think it would be appropriate for a trade body to sit on the group. GH suggested EN could be invited as a guest to present at the meeting to talk about the test.

Action: REAL to consider inviting other individuals to join the PRT TWG to support producers

Action from last meeting: Georgina to provide Gregor with information to present to the plant response test TWG

Action from last meeting: REAL to share Data Access Request Form with Gregor Keenan when available

This has been completed.

Scheme Participant Twitter

REAL have recently created a private Twitter account to share scheme news with certified Producers. This Twitter page will be aligned with the 'news' section on our website and updates, newsletters, and important changes to the Scheme will be shared via tweets. Twitter handle: @CCSProducers.

This account was supported by Producers at the Forum, as it provides an alternative means of contact should emails be blocked.

Action: EC to send MR email addresses of operators who are not receiving scheme communications

Audits during Covid-19

In consultation with the Environmental Regulators and the Certification Bodies in September, and in light of the current situation regarding COVID-19, REAL have agreed that both remote inspections and on-site/physical inspections will continue. REAL took into consideration several variables, including the increase in COVID-19 threat level, the rise in cases of local lockdowns, and recent Government advice for people to work from home.

3. Updates on the Research Hub and First Research Project

OF reported that the first Research Project officially kickstarted in June and the project remains on track for scheduled completion in January 2021. There have been fortnightly meetings between REAL and NNFCC, to provide an update on project development and to monitor project progress, as well as monthly team meetings between NNFCC/Vital/REAL. The fifth of eight project milestones is near completion; NNFCC will provide a report to REAL summarising the findings of the Gap Analysis during November 2020. A static version of the digital library has been showcased to REAL; data gathered during the Literature Review is currently being transferred into the platform.

The second project selected for commissioning is titled *'To develop a 'data pack' on the properties, characteristics, and content of digestate that will provide the context for the development of new uses of outputs from Anaerobic Digesters'*. A Project Management Team (PMT) was established for the second project of the Hub, to include individuals from Zero Waste Scotland, REA and REAL. The PMT have drafted a Project Brief and a Tender Invitation Document, which are now in the public domain. The tender process has been initiated and the deadline for tender submissions was Friday 2nd October. The first Tender Evaluation Meeting will take place next week, and the tender process is due to conclude, and a contractor for the second project be appointed by November 2020.

The Research Hub website was launched in August and its traffic is currently being monitored. The first Annual Report of the Hub, surmising the Hub's activity in 2019, has been finalised and was circulated to operators and industry at the beginning of September. A decision has been taken not to hold a Panel meeting in October 2020, since there are no immediate decisions to take. The Research Project Selection Process has been revised – the new process will be implemented from 2021. Operators will be able to vote on projects before they are shortlisted.

NNFCC Update

Lucy Hopwood reported that NNFCC started this project by conducting a literature review through different platforms, to identify research in the last 10 years relevant to the compost and AD sectors. There was also a consideration of research out of the 10-year period and outside of the UK.

NNFCC viewed several hundred articles, journals and industry reports and catalogued over 200 key articles, according to the type of publication and research. The abstract and summary of research has been recorded. Once this was completed, there was an identification of key topics which allowed NNFCC to come up with research themes for AD and composting. The key research for composting is feedstock and pre-treatment, process design and control, process optimization, associated emissions and compost quality and application.

The next step is an Industry Needs Assessment (INA) through Survey Monkey. The structure and focus have been informed by the key themes identified in the literature review. NNFCC have been liaising with BCS and CCS producers on this INA. A gap analysis will be carried out to identify where there are gaps in the key research areas, it will take into consideration the findings of the literature review and industry needs assessment. The gaps will be ranked in discussions with key stakeholders and results will be presented in the digital platform.

4. Update on the CQP review

The outcome document will explain why the Environment Agency does not support the CQP as it stands. The QP will from that date be covered by a Regulatory Position Statement (RPS), which will allow time for operators to gain the necessary permits, or for the revision process to take place. From the date of publication, industry will have 6 months to commit to funding and the revision process would last for approximately 6 months. If funding does not appear, the RPS will be withdrawn and waste controls will apply (in England and possibly elsewhere). If a revision takes longer than 6 months, the RPS could be extended.

As of the date of the Forum, industry was still waiting for the outcome of the CQP review. REAL understands the document was progressing through an internal approval process.

Action from last meeting: REAL to continue to seek clarity from the Environment Agency on plans for the CQP review

REAL plan to host a joint event with the REA on the QP review once the outcome document is published.

SM questioned if the EA would be adding waste codes in the outcome document. Waiting for this information is holding back new projects, as they will not start if they do not go on the QP. In Wales, decisions around waste codes are being made on a case by case basis. There is not much clarity on the timings set out by the EA.

5. Feedback from the last Technical Advisory Committee meeting

GK reported that most updates had been covered.

Remote audits continue and there has been a slight relaxation of the rules with couriers and sample time. This temporary relaxation for test start times has since been withdrawn based on feedback from the labs that this was no longer an issue. Producers reported that there are still issues with

transporting samples and delays at depots. AC reported that one site had to cancel a sample as it was affected by courier time and NRM informed the site that the results could no longer be accepted. REAL were not aware that this issue was ongoing, and this will be looked into.

Action: REAL to discuss and raise issues regarding delayed couriers with approved laboratories

GK reported that he intended to follow up with Tom Aspray on Particle Size Distribution Data analysis that was carried out. Producers did not see misreporting of grade sizes as an issue if the product goes through a smaller screen. If the compost was purchased for finer application and it was too coarse, there would be an issue, but the other way round would not matter.

6. Issues raised with CCS Producers' Representative

The plant response test was the only issue that had been raised with Gregor and he reiterated he is under pressure from producers to sort this issue out.

GP informed that REAL are currently working on an internal roadmap, which will consider the outcome of each meeting. REAL are also liaising with BSI to ascertain if test methods can be changed outside of a PAS revision process. REAL wants to ensure that this process is carried out systematically, and it is not yet clear that all group members are in agreement that the test should be replaced.

Producers commented that Graham Howell should know the PRT method inside out as he contributed to the WRAP report where the method is outlined.

Action: Producers to consider compiling a list of questions on the PRT to put forward to REAL

Action: Producers to consider meeting to discuss information gathering for the PRT TWG

Action: REAL to consider sharing the current version of the PRT method with producers

7. An opportunity to discuss other issues raised by producers

EC asked producers if they had any experience with a Solvita testing kit. SM reported that she liked using the kit, but there is no demand for them in the UK and therefore they are no longer available.

AC commented that meetings are better in the morning due to school pick up and drop off.

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

Action: REAL to aim to hold forum meetings earlier in the day

End

Actions:

- AC to provide list of laboratories to REAL to consider contacting regarding approval
- REAL to add agenda item for checking minutes accuracy for the next forum meeting

- REAL to consider ways of gathering feedback from departing scheme participants
- REAL to consider inviting other individuals to join the PRT TWG to support producers
- EC to send MR email addresses of operators who are not receiving scheme communications
- REAL to discuss and raise issues regarding delayed couriers with approved laboratories
- Producers to consider compiling a list of questions on the PRT to put forward to REAL
- Producers to consider meeting to discuss information gathering for the PRT TWG
- REAL to consider sharing the current version of the PRT method with producers
- REAL to aim to hold back-to-back meetings with the REA next year post-pandemic
- REAL to aim to hold forum meetings earlier in the day