



Operators Forum Meeting Minutes

Wednesday 28 June 2017

Trinity Centre, Cambridge Science Park, Milton Road, Cambridge, Cambridgeshire, CB4 0FZ

Chair: Justyna Staff

Attending:

Justyna Staff	REAL
Georgia Phetmanh	REAL
Gregor Keenan	CCS Producers' Representative
Jenny Grant	Technical Author for PAS100 revision
Howard Everson	TMA Bark
Michael Wheatley	Yorwaste SJB Recycling
Richard Lynas	SUEZ Recycling and Recovery UK Ltd
Mark Greenhough	SUEZ Recycling and Recovery UK Ltd
Peter Upham	Birch Airfield Composting Services Ltd
Anthony Walker	Cumberlow Compost Services Ltd
Morgan Davies	The Woodhorn Group
Martin Graves	Envar Composting Ltd
Shiraz Ameer	Envar Composting Ltd
Rachael Bacon	Envar Composting Ltd
Alexis Noonan	Envar Composting Ltd
Agnes Starnawska	Veolia
Matthew Chapman	MEC Recycling Ltd
Nicola Feeney	Natural World Products
Dearbhail Ni Chualain	White Moss Horticulture
Emma Cheetham	Land Network (Gainsborough)
Charlie Trousdell	Countrystyle Recycling
Karen Moutos	Agrivert

1. Welcome and introductions

Justyna welcomed everyone to the fifth meeting of the Producers Forum and PAS100 Revision Workshop. During the informal working lunch, operators were provided with worksheets to prompt discussion around aspects of the standard they would like revised. Justyna explained the function of the Producers' Forum and the aim of the PAS100 Revision Workshop. The meeting then started with a quick roundtable introduction. Delegates represented a range of technologies and businesses and the meeting was attended by Gregor Keenan, the CCS Producers' Representative.

2. Scheme update

Georgia explained the relationship between Renewable Energy Assurance Ltd (REAL) and the Renewable Energy Association (REA), the company administering CCS and the trade body and sector group within REA representing the industry. REAL is a subsidiary company of the REA and is the Scheme Owner of the CCS. We are responsible for administering the Scheme and our work is not influenced by the activities of the trade association. The REA is a trade association and the Organics Recycling Group (ORG) is a sector group within the REA that works to represent the industry in a policy and regulatory context. Their activities are separate from our own, although we work closely with our colleagues at ORG.

Georgia presented some figures on the status of the Scheme, the changes over a 12-month period, and changes since the beginning of the year. There were 163 certified plants processing approximately 3.4 million tonnes of waste annually and producing approximately 2 million tonnes of certified compost annually. A line graph displayed a downward trend in the number of processes certified under the Scheme since June 2016. Operators suggested that this could be due to combining processes, upper limits in PAS100 are too stringent, companies are amalgamating, or there are fewer areas to develop sites with objection from neighbours and issues with aerosols etc. Four new applicants joined the Scheme since the beginning of the year and all become certified, two certificates were suspended, and four processes were withdrawn.

Updates on recent developments related to the appointed certification bodies and appointed laboratories. NSF Certification (NSF) and Organic Farmers & Growers (OF&G) were reappointed following their strong tender submissions in response to a tender we opened last year. We are confident that they will continue to deliver efficient certification services. Georgia stated that there were over 1500 PAS100 test reports stored in the database. This transition had taken place smoothly but Georgia stressed that some operators are still not providing certification codes to the laboratories and this is necessary if the reports are to count towards ongoing certification. It was announced that a third certification body has been appointed recently – Aardvark Certification Ltd. A fifth laboratory applied to be appointed under the Scheme last year but their appointment was unsuccessful. The appointed laboratories completed their second round of audits last year and had all made significant improvements. Their appointments were renewed until December 2017. The appointment of the independent auditor from Heriot-Watt University and his audit team was also renewed.

3. PAS100 revision update

Justyna delivered a presentation on the PAS100 review/revision process and plans for the coming year. Justyna explained that PAS100 is owned by BSI and the standard is to be reviewed as and when the technical need arises or after two years. REAL received the agreement from WRAP and started discussions with BSI in spring 2016, and REAL became the new sponsor in summer 2016. Justyna explained that we require technical evidence to support any changes. To date, we have appointed the technical author and signed a contract with BSI. The project initiation meeting and technical author training took place in May and the press release about the PAS100 revision was sent out in June. There are numerous meetings set up over the coming months with industry stakeholders; the environmental regulators, HACCP Working Group, NFU and Farm Assurance Schemes, trade bodies, WRAP, and Zero Waste Scotland (ZWS). Following these meetings, REAL will submit a base document/draft to BSI later in the year and the next step is public consultation on this document.

Justyna described the scope of the revision and explained that the revision will focus on specific areas such as the minimum quality requirements. UKAS have stated that the HACCP section 'would need to be substantially revised before it would be acceptable for accreditation'. Clause 15.4 is also a clause that has been proposed for consideration and commented on by UKAS. ORG members suggested that there could be separate plastic limits for hard and film plastic because they have different environmental impact. REAL suggested that independent sampling could be introduced for all samples during validation and a number of samples/frequently after validation to improve robustness of the Scheme. This presentation was delivered amongst discussion.

4. Discussion

This meeting provided the opportunity for producers to raise and discuss issues they may be experiencing in relation to certification under the Scheme (Producers' Forum) and share experience, provide suggestions, and contribute to discussions around requirements they would like to change or introduce as certified operators (PAS100 Revision Workshop). The general consensus was that the standard should be more meaningful for agriculture because it is the main market for compost in the UK. Below is a brief summary of the discussions and action points from this meeting.

Inter-laboratory variability with test results

- Some operators have sent the same samples to different labs and received different results
- REAL explained that proficiency testing schemes/inter-laboratory trials would have to be created/introduced as they don't exist for non-standard test methods
- Producers would be interested in seeing results of current proficiency testing schemes (microbial pathogens – APHA)

Plant response test

- Operators expressed concern over test method, winter failures, inter-laboratory variability with results, importance of the test for agriculture, and process duration
- Operators questioned the use of peat and tomato plants, and duration of the growth trial
- REAL provided a brief overview of current investigation into winter failures but agreement that nobody has been able to explain the cause of higher failure rates over winter
- Many operators expressed that there was a problem with the growth trial during winter because many had experienced a higher rate of failures that they couldn't explain
- Operators (and consultants) had conducted their own investigations into the cause for a high failure rate over winter but could not find an explanation
- Suggestions for explanation for winter failures included; over-watering of sample in comparison to control and watering regime, test method changes (in response to WRAP recommendation), correlation with stability levels and process duration, high electrical conductivity values, changes in feedstock conditions over winter
- General consensus: recent winter failures are inexplicable and the plant test methodology is thought to be the root of the issue, correlation could not be found with electrical conductivity, changes in feedstock materials, or compost quality
- Suggestions for revision to standard; remove test requirement for agriculture, change parameter limits for horticulture and agriculture (failures more important for growing

media), allow failed samples to be dispatched to agriculture, different requirements for different markets e.g. weed seeds only for agriculture but the rest for other markets

- Suggestions for revision to method; shorten growth trial, use alternative plant to tomatoes, use alternative material to peat, change cut-off date for germination
- Operators suggested they could produce their own evidence for changing parameter limits
- Different plants currently being tested for herbicide detection (WRAP project)
- Operators and REAL provided explanations for different factors e.g. why peat is used
- Herbicide detection and measure of stability were listed as important reasons for test

Market-based approach

- Suggestion: introduce specific limits and parameters for different markets
- Questions; how many markets and what is the spectrum? At one end do we have agriculture and the other end horticulture/growing media? Which markets sit in between? Should the growing media market/manufacturers specify requirements for composters? Should there be one set of requirements for compost produced as growing medium ingredient (supplied to manufacturer) and growing media produced on site? Should there be one set of requirements for agriculture and one set for horticulture?
- Suggestion: introduce a better baseline minimum for compost destined for agriculture
- What would be the implications for the CQP if requirements were introduced/changed?
- General consensus: compost going to land/agricultural market should not have the same requirements as compost destined for the growing media/horticulture markets

Physical contaminants

- Operators expressed frustration over the amount of contaminated feedstock
- Operators expressed that more pressure should be put on local authorities/collection contractors to reduce contamination in feedstock material
- Operators expressed that more pressure should be put on local authorities/environmental regulators/government to educate the public and reduce contamination in feedstock
- Suggestion: should PAS100 introduce input quality criteria or input acceptance criteria?
- Response: onus should be on local authorities, input specification would lead to falsification of samples, all green waste should first meet PAS standards before introducing quality criteria, it would depend on how the requirements are worded in the PAS for producers

Plastics

- Suggestion: separate limits for hard and film plastics
- Operators questioned the revised SEPA limits and QMS limits
- Operators questioned whether the plastics break down differently and to explore work carried out by David Tompkins with QMS in this area
- Discussion around the limitations of the physical contaminants testing regimes
- Visual pollution doesn't seem to impact on farmers so why change the limits
- General consensus: don't include different limits for hard and film plastics

Stability

- Concern over the environmental regulators stance on stability
- Queried the existence of correlation between stability and odour – consider presentation at ORG conference held a few years ago
- Stability is important because compost needs to be stable for odour, vermin/flies, nitrogen
- Should a result within such a small margin over the limit signify a failed batch
- Suggestions; use past data on passes to prove to the Environment Agency, introduce a yearly average/rolling average to be used for any marginal failures, different limit for agriculture

Stones

- Suggestion: stones in agricultural are not an issue and minimum limits should be raised
- However, stones do cause issue for farmers when scattered in spreading equipment/machinery and we need to consider health and safety
- Mass or volume should be considered and operators questioned why dry weight is used for testing over fresh weight, which might be more appropriate
- Suggestion: calculate average stone content of green waste to identify starting point
- Suggestion: use PAS100 test results data to review current stones level
- Suggestion: discuss the issue around stones with professional agronomists
- Operators questioned where the 8% limit came from

Independent sampling

- REAL raised a discussion around the introduction of independent sampling
- REAL suggestion: independent sampling for all samples during validation and a number of samples/frequently after validation
- Operators expressed concern over the costs they would incur over a period of time and did not agree overall with the introduction/necessity of independent sampling
- Operators believe the focus should be on the input material not how the samples are taken
- Concern over timing and dispatch to labs and consequences of failing
- Independent sampling doesn't happen in quarry industry, they take their own samples
- REAL explained that this would be for the integrity/robustness of the Scheme and feedback from various sources over manipulated samples is concerning
- Suggestion: introduce guidance on sampling during validation?
- Suggestion: auditors take samples/witness sample taking during audit with no extra cost
- Operators would like choice of independent sample contractors and not monopoly
- Suggestion: introduce sampling training in conjunction with current PAS100 workshop

Other suggestions

- Average results: suggestion to use average results over a number of samples to give more leeway with the limits if the historic data shows it to be okay
- Couriers: suggestion to revise clause in PAS100 regarding couriers/time taken for samples
- Renewal phase: suggestion to remove the renewal application requirement and have a permanent certificate with annual inspection

- Soil assessment: could the requirements be similar for certification as for waste and deployments – provide results and responsibility lies with the customers using their own knowledge and soil assessment, test the compost then decide on the market
- E. coli: other materials get spread to land without testing for E. coli so why should composters? Could we test sludges to prove this requirement is unnecessary?

Summary of Key Actions

- REAL to continue exploring PT schemes and consider sharing outcome with operators
- REAL to discuss plant response test issues at Technical Working Group and continue investigation into winter failures with laboratories
- REAL and technical author to consider introduction of input quality criteria and consider importance of phrasing in PAS100
- REAL to discuss physical contaminants issues with NFU and Red Tractor
- REAL to consider using test results in database to calculate current stones level
- REAL to gather certified producers' views and explore suggestions during revision process