



Summary Notes from the joint meeting of the Oversight Panel for the Biofertiliser Certification Scheme and the Technical Advisory Committee for the Compost Certification Scheme

Thursday 1st December 2016, 12.00 – 15.00, Eversheds offices, London

Attendees:

Professor Stephen Nortcliff (SN) – Chair; Ciaran Burns (CB) – REAL – Biofertiliser Certification Scheme; Georgia Phetmanh (GP) – REAL – Compost Certification Scheme; Virginia Graham (VG) – REAL; Gregor Keenan (GK) – CCS Producers’ Forum representative; Kristy Blakeborough-Wesson (KBW) – BCS Operators’ Forum representative; Roy Lawford (RL) – Organic Farmers & Growers; Rob Evans (RE) – NSF Certification; Kate Adams (KA) – NSF Certification; Will McManus (WM) – WRAP; Duncan Rose (DR) – NRM Laboratories

Teleconference:

Jenny Grant (JG) – REA – Organics Recycling Group

1. Introductions & welcome

Professor Stephen Nortcliff welcomed everybody to the meeting and noted apologies.

2. Compost Certification Scheme update – GP

The current status of the Scheme and latest developments were presented. There were 173 certified processes accepting just less than 3.5 million tpa of waste and producing just over 1.8 million tpa of compost. 10 new producers applied to join the Scheme and became certified successfully but there hasn’t been any significant growth or decline in the total number of certified processes.

To date, the REAL CCS database has received over 600 PAS100 test reports since the beginning of July 2016, and these have been accessed directly by the certification bodies. The certification bodies are notified of the reports, once they are uploaded, and the auditors will only accept PAS100 test reports provided by the certification officers. They will not accept test reports provided on site.

A summary report has been published on the Compost Certification Scheme website outlining the results of the 2015 audit round. These changes have helped to improve the robustness and

transparency of the Scheme. The second round of audits was nearing completion and many areas of improvement were noted by the audit team compared to the results of the first round.

a. Update from the certification bodies

RE reported that NSF had received one complaint from the Environmental Health Department but it related to a complaint raised 3 years ago. The site had since been audited 3 times so the spot check was cancelled and the issue is considered to have been resolved.

RL reported that one complaint received by OF&G in April concerned high levels of plastic. This was due to contaminated feedstock material supplied by a new supplier. The investigation revealed that they weren't enforcing the rejection policy because they didn't want to lose the contract. However, after certificate suspension (and withdrawal), they eventually implemented corrective actions. This included installing a new wind sifter and employing new staff. The complaint was resolved.

The full report will soon be available on the Compost Certification Scheme website [here](#).

b. Producers' Forum update

The most recent forum meeting took place in Cambridge. GK presented an update on the latest discussions which revolved mainly around the PAS100 review/revision. Operators also brought into question; the necessity of *E. coli* testing and stability testing, different parameter limits for different end markets, verification of PAS100 test results. Notes from this meeting are available on the CCS website [here](#). The importance of the forum was stressed and operators are encouraged to attend.

c. Laboratory update

REAL set up several meetings with the four CCS-appointed laboratories, this involved a group teleconference. An issue affecting the laboratories relates to details missing from the new PAS100 compost analysis request forms. The laboratories need to be provided with the certification codes in order for the test reports to be uploaded to the REAL CCS database and count towards certification. The issue is ongoing but operators are now a lot more familiar with the new requirements, and REAL will continue to work with the laboratories to ease their workload.

3. Update on Scotland End-of-Waste

JG presented an overview of SEPA's proposals to reduce the physical contaminants limit for compost and digestate. SEPA are keen to support operators and give them time to adjust. Both SEPA and ZWS hope to address any issues that may arise along the entire waste supply chain. Many operators have expressed concern that it would be difficult to meet the proposed limits all the time. SEPA have altered their proposed position on material with 'waste' status – they will now allow waste to be spread to agricultural land under an exemption from waste management licensing.

There is concern that the current PAS110 method is not sensitive enough to detect the low levels of physical contaminants in digestate needed to comply with the proposed parameter limits. It has been suggested that the test method could change from the current weight method to a surface area method. ORG, in collaboration with ZWS and SEPA, might carry out some analysis work in the future, looking at physical contaminants in feedstock material supplied to compost and AD sites. Scottish Government will also be trying to support local authorities to improve feedstock quality.

It is apparent that there are still areas for development with market acceptance of compost and digestate. One reason for the rejection of certified digestate application to agricultural land could be due to confusion between 'digestate' and 'biosolids'. This indicates that more communication may be needed with the agricultural retail sector to prevent this misunderstanding.

4. Biofertiliser Certification Scheme update – CB

The current status of the Scheme and future growth opportunities were presented. There were 54 plants certified under the Scheme processing approximately 2.7 million tpa of waste. This figure was compared to the 15 million tonnes of food waste produced annually in the UK, highlighting a substantial amount processed by anaerobic digestion. Anaerobic digestion has only been deployed significantly over the past 6 years.

There are an estimated 110 (food waste) AD plants in the UK which shows only roughly half are certified. There may be numerous reasons for not choosing certification, including; not being prioritised/lack of resources/inability to financially support the adoption of PAS110 etc. However, open dialogue amongst AD operators across the country spreads the knowledge of certification.

a. RHI

The RHI budget for biomethane injection to the grid should be enough to support 20 new plants per year up to April 2020. The recent RHI consultation proposed a crop cap, removing support for crop-based feedstocks, and so encouraging the uptake of waste-based feedstocks. This would result in new biomethane plants taking in more waste and potentially then an increase in the number of plants certified under the Scheme. However, the limitations of the Renewables Obligation and Feed-in Tariff scheme mean that it's unlikely any new biogas plants will be built to produce electricity only.

b. Mercury testing

The BCS/CCS appointed laboratories were provided with the option to use an alternative method for mercury analysis to the one specified in PAS110/PAS100. The instrument developer no longer manufactured the equipment used by one of the laboratories and their alternative method had already been validated. The other laboratories were also granted permission by REAL to use an alternative method for analysis on the conditional basis that it was validated and they participated in the proficiency testing schemes. This was discussed with the independent auditor.

c. PAS110

It was queried whether PAS110 was going to be reviewed/revised in 2017. VG advised that REAL wouldn't be seeking to revise it again in 2017 – there's no scope for revision but a review may be possible. The SEPA proposals to introduce tighter limits on physical contaminants could lead to the collection of data that could be used to inform any future revisions of PAS110. One suggestion for potential changes to the Scheme standard(s) was the addition of more waste codes to the ADQP. There are various waste streams that AD operators consider acceptable as feedstock material but are not currently allowed under the ADQP.

d. Operators' Forum update

The most recent forum meeting took place in Birmingham. KBW provided feedback from the latest meeting and previous correspondence. One issue brought to light laboratories failing to notify operators of missing samples and failing to notify operators if the test breaches the RBP limit.

Another issue discussed at the meeting related to local Environment Agency officers taking responsibility for issuing spreading permits and deployments. Some operators had experienced EA officers intervening in autumn applications of certified digestate to land. One operator was able to demonstrate that the digestate brought agricultural benefit so did not revert back to a ‘waste’ but not all operators will have the knowledge/experience to respond appropriately to the EA officers. The DC-Agri project published by WRAP recommends spring applications but autumn applications can also be beneficial for certain crops. Operators were also concerned that EA officers were providing the wrong EWC codes and changing prescribed waste codes incorrectly. The consequences of these actions were debated and other issues/experiences were shared.

5. WRAP update – WM

An update on current or future WRAP projects relevant to CCS and BCS was provided.

1. The physical contaminants report is now with DEFRA and is now due to be published soon.
2. The ASORI is now known as the Organics Recycling Status Report. The 2015 report is in the final stages of a review with WRAP and will be published soon – possibly in spring 2017.
3. A map and report on the composting infrastructure and capacity in Wales was published.
4. A study showed that construction companies are pleased with the results of using compost as landscaping material which can replace the transportation of soil.
5. The Food Waste Recycling Action Plan (FWRAP) has been published on the WRAP website.
6. The Quality Action Plan (QAP) is developing guidance for food waste companies on food waste collections and also looking at improving quality.

WM noted that WRAP is unlikely to be doing any more evidence gathering or research projects.

6. AOB

The tender for organisations to offer their services as Certification Bodies under the Biofertiliser Certification Scheme (BCS) was due to close.

Ciaran Burns will be leaving REAL to start a PhD in January but will be hoping to contribute to Scheme projects one day a week. The management of the Biofertiliser Certification Scheme will be taken over by Justyna Staff and Georgia Phetmanh. They will also be managing the Compost Certification Scheme.