



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

Tuesday 4th July 2017, 11.30 – 15.00, Osborne Clarke, London

Attendees:

Professor Stephen Nortcliff (SN) – Chair; Justyna Staff (JS) – CCS & BCS – REAL; Georgia Phetmanh (GP) – CCS & BCS – REAL; Virginia Graham (VG) – REAL; Gregor Keenan (GK) – CCS Producers' Forum representative; Jo Chapman – BCS Operators' Forum representative; Kate Adams (KA) – NSF Certification (NSF); Julia Summers (JS) – NSF Certification; Nicholas Johnn (NJ) – Aardvark Certification Ltd (Aardvark); Theo Plowman (TP) – National Farmers Union (NFU)

Teleconference:

Duncan Rose (DR) – NRM Laboratories (NRM)

1. Introductions & welcome

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

2. Scheme updates – GP

The current statuses of the CCS and BCS were presented, including trends in growth or decline.

a. CCS numbers

There were 164 processes certified under CCS, processing over 3.5 million tpa of waste and producing just less than 2 million tpa of compost. A graph displayed a downward trend in the number of processes certified under the Scheme since June 2016. Operators at the Producers' Forum meeting suggested this could be due to a number of reasons such as companies amalgamating. However, SN pointed out that it's important to recognise input tonnage has increased despite the decline in numbers. Four new producers joined the Scheme, two certificates were suspended, and four processes were withdrawn from the Scheme since the beginning of the year. SN questioned whether sites were closing due to pressure from local authorities. JS expressed that she will explore why sites might have closed down/ceased compost production.

b. BCS numbers

There were 60 plants certified under BCS, processing over 3 million tpa of feedstock annually. The Scheme has experienced significant growth since 2014 when there were only 17 plants certified. Operators at the Operators' Forum meeting speculated that this significant increase in members between 2014 and 2015 could be due to revisions made to the PAS110 standard. Operators also expressed that reasons why plants might not choose PAS110 accreditation could include the misconception that PAS110 is too onerous, complicated, and daunting. It was suggested that more guidance is given to applicants and a more realistic checklist/step-by-step guide for applicants is developed to enable producers to join.

c. Developments - CBs

The latest developments concerning the certification bodies were presented. NSF and OF&G were reappointed as certification bodies under CCS in 2016 and under BCS in 2017. SN commented on the high standard of tender submissions and congratulated the CBs. It was announced that Aardvark had been appointed under both CCS and BCS. GP also explained that REAL were developing auditor competency criteria for the CBs which will provide baseline requirements for appointing auditors. This document is still under development but will be finalised soon for both CCS and BCS.

c. Developments - labs

The latest developments concerning the appointed laboratories were presented. The CCS laboratories completed their second round of audits last year and had all made significant improvements. Their appointments were renewed until December 2017. The BCS laboratories were audited for the first time this year and we are awaiting recommendations from the independent auditor regarding their appointment under BCS. We received copies of their audit reports and the auditor commented on significant improvements made and high levels of compliance to the Laboratory Terms & Conditions (T&Cs). The appointment of the independent auditor from Heriot-Watt University and his audit team was also renewed under CCS. SN commented on the high levels of competency and professionalism shown by the independent auditor. REAL is currently reviewing the laboratory T&Cs with the aim of producing a new version under both CCS and BCS.

c. Discussions/issues

GP outlined the recent relevant discussions that had taken place internally. An investigation commenced at the start of the year to explore whether there had been a higher rate of plant response test failures over the winter period. Data analysis conducted by the laboratories and REAL confirmed that there are higher rates but no solid explanation. REAL and the laboratories are currently comparing these results with stability results. At the CCS Producers' Forum, producers made many suggestions for changes to the plant response test requirements for the PAS100 revision. SN and JS informed everyone that they were exploring an alternative plant during the TWG.

Since the WRAP physical contaminants report has been published, REAL has been in discussion with the appointed laboratories and certification bodies about the outcomes of the report and WRAP recommendations. GP gave a few examples of the action REAL is taking to address the findings and recommendations. This report was discussed at the TWG.

A very productive meeting was held in Cambridge between JS, SN, and the independent auditor. The Technical/Testing Working Group (TWG) meeting was held to discuss the revision of the laboratory T&Cs, PAS100 revision, and issues associated with test methods. Outcomes will be explored.

REAL received feedback that the Environment Agency believed PAS110 was being 'abused'. We raised this subject at the BCS Operators' Forum and discussed the scope of the BCS.

GP informed everyone that the CCS Producers' Forum was attended by approximately 25 people and was held in conjunction with the PAS100 Revision Workshop to discuss the PAS100 revision.

3. Updates from the CBs and labs

KA and JS provided updates on complaints and observations. DR raised an issue experienced by the laboratories and delivered any feedback from the other laboratories.

a. Update from CBs

JS reported that NSF had received one complaint from a producer about the late delivery of a certificate. The audit had taken place a while ago but the producer hadn't been invoiced and so hadn't paid. The certificate was not issued due to payment not received but NSF offered a reduction on their next audit. KA informed everyone that operators are generally proactive regarding failures and will contact NSF directly. They are keen to improve their practices and processes.

a. Update from labs

DR reported that the AB117 courier they use for sample collection had recently suffered from a cyber-attack on their business so customers weren't able to book through the laboratory. Operators could book other couriers but the alternative companies might not have national coverage and transit would be delayed. DR confirmed that the laboratory would be sending out an email to alert customers for this and are waiting for an update from TNT. GP confirmed that REAL will also send out an email to alert members of this. REAL and the laboratories will discuss the potential issues surrounding delayed delivery of samples and failures.

4. Updates from the representatives

GK presented an update from the recent CCS Producers' Forum meeting/PAS100 Revision Workshop. JC presented an update from the recent BCS Operators' Forum meeting.

a. Update from CCS Producers' Representative

GK provided an overview of the discussions from the CCS Producers Forum & PAS100 Revision Workshop including suggestions for PAS100 revision so that compost meets different requirements for different end markets. There was a lot of discussion around the plant response test and potential explanations for winter failures. DR said that he will check the watering regimes with his colleague because the watering regime is thought by some to be the cause. There was also discussion around independent sampling and how a new IS scheme could be implemented. KA expressed that it would be good for sampling to be witnessed during audit and sampling training to be provided. Independent sampling during validation and for the end product was suggested. At the meeting, one operator suggested using average results over a number of samples to give more leeway with the limits if the historic data shows it to be okay. It was also suggested to remove the renewal application requirement and have a permanent certificate with annual inspection. KA expressed that the CBs would need evidence for this. Brief minutes from the fifth meeting of the Producers' Forum can be found on the Producers' Forum page of the CCS website.

a. Update from BCS Operators' Representative

JC provided an overview of the discussions from the BCS Operators' Forum. The environmental regulator apparently believes that PAS110 is being 'abused' and at the Forum we discussed reasons why they might believe this. Farmers often use contractors to spread digestate and might not know what is being spread. The scope of the BCS and ADQP guidance mean that this is out of the AD operator's control. TP provided feedback from an NFU perspective and informed everyone that NFU is developing guidance for farmers. REAL will discuss this issue with the Environment Agency. Some operators don't understand issues with storage and aren't interested in the backend. JC expressed that the Operators' Forum is a great opportunity for producers to discuss these issues and suggested that REAL could be more instructive. The 21-day grazing ban following application of ABP derived digestate to manage risks from grazing presents practical issues in a farming context. Operators had suggested that there may be alternative and equivalent mechanisms to manage risk. We could feed comments into ABPs consultation to raise this issue. Drying technology is being used increasingly on AD sites to dry digestate and other materials. This presents a number of issues with regard to PAS110, but there was particular discussion about the suitability of the application of the PTE thresholds that are presented on a fresh weight basis to dried final digestate products. REAL will discuss biochar and drying digestate with the CBs.

5. PAS100 revision update

JS delivered a presentation on the PAS100 review/revision process and plans for the coming year. REAL received the agreement from WRAP and started discussions with BSI in spring 2016, and REAL became the new sponsor in summer 2016. 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.

JS 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.

REAL will discuss the spring barley test with laboratories as an alternative to the current plant response test. The seeds germinate over a much shorter period (10-12 days).

6. AOB

The ADBA Best Practice Scheme was discussed at this meeting. NJ imparted knowledge of the Scheme as Aardvark is the certification body for the pilot. NJ believes that there isn't any duplication of the PAS110/BCS requirements and the ADBA Scheme is mainly focussed on design, operation, and environmental performance and prevention of environmental pollution. Development of the Scheme has been driven by insurers and regulators. NJ explained the Scheme introduces training for staff competency etc. but JS expressed that PAS110 also covers good quality practice and is not just about the final product. It is about implementing a robust QMS etc. The Scheme is about input and

process and output. We need to change perception of Scheme. JC and GP are attending the seminar delivered at the AD and Biogas show to find out more about the Best Practice Scheme.

Summary of Key Actions

- JS to explore why sites might have closed down/ceased compost production
- DR confirmed that NRM will send out an email to alert customers of AB117 courier issue
- GP confirmed that REAL will send out an email to alert members of AB117 courier issue
- REAL and the laboratories to discuss the potential issues surrounding delayed delivery of samples and test failures
- DR confirmed that he will check the watering regimes with his colleague - the watering regime is thought by some to be the cause of the winter plant response test failures
- REAL to discuss 'abuse of PAS110' issue with the environmental regulators
- REAL to be more instructive about what operators can feed into the Forum and Panel
- REAL to discuss drying step and digestate sampling with certification bodies
- REAL to discuss biochar as feedstock or additive with certification bodies
- REAL to discuss spring barley test with laboratories as an alternative plant growth test
- JC and GP are attending the seminar delivered at the AD and Biogas show to learn more about the ADBA Best Practice Scheme