



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

Tuesday 5th March, 11.00 – 12.30, Teleconference

Teleconference attendees:

Professor Stephen Nortcliff (SN) – Chair; Georgia Phetmanh (GP) – REAL; Tom Aspray (TA) – REAL/Solidsense; Gregor Keenan (GK) – CCS Producers' Representative; Jo Chapman – BCS Operators' Representative; Roy Lawford (RL) – OF&G; Nicholas Johnn (NJ) – ACL; Janet Gascoigne (JG) – UKAS; Alison McKinnie (AM) – ZWS; Fiona Donaldson – SEPA Eugene Kelly (EK) – NIEA

1. Update from REAL

a. Research Hub

GP provided an update on the developments of REAL's Research Hub. Since the last TAC meeting, REAL had invited research project proposals from industry with an initial deadline of 10th February, which was extended to 13th February. The CCS and BCS websites had been updated with information about the timescales for identifying project proposals and the tender process. The Hub's governance paper had also been updated and published with governance details.

GP informed that REAL did not receive as many project proposals as expected but with time, we anticipate more involvement and interest. SN believes that whilst this first response is disappointing, hopefully when operators know more about the chosen projects, and experience the benefits that the Hub will bring, there will be more support. REAL should go back to the Forum meetings with further explanation on the potential projects that could be funded and the principles of the Hub.

GP informed that the first meeting of the Research Panel had to be postponed. However, when the Panel meets it will consider the projects proposed to date and compile a list for scheme participants to vote on. REAL will analyse these results in preparation for the next Panel meeting where the projects will be decided on. Reports will be prepared for the TAC meetings.

NJ added that over time, as operators pay the research fees and question what they are for, there is likely to be more involvement.

b. SQCS workshops

GP provided an update on the Safety and Quality Control System (SQCS) workshops that were held for the certification bodies and inspectors. REAL worked with a HACCP expert/trainer who delivered the workshops and used example SQCS documents for the assessments, which were provided by several

operators/consultants. The workshops were held to discuss and understand how to assess a Safety and Quality Control System, in line with the new PAS requirements.

Discussions took place on how to interpret clause 4.2 in PAS 100:2018 and how market/customer requirements should influence the HACCP/SQCS. We considered what the auditors and certification officers should look for and the sort of non-conformances they might identify.

The HACCP trainer had reviewed the examples provided and these were discussed at the workshops. In summary; it was not always clear how the operators had justified their critical limits and CCPs, it was not always clear what evidence was used to validate the CCPs, HACCP team members were not recorded, the list of feedstocks were not recorded (they might have been listed in the SOPs but they should be linked in the HACCP), flow diagrams did not show the process steps only (flow diagrams are not required but they would be useful for HACCP planning), and hazards were grouped together but they should be separated in the plan because they may have separate CCPs.

We considered that composters could use 'summer' and 'winter' HACCPs with different feedstocks introducing different hazards depending on the season. SN agreed that this is a good idea. GP added we considered change is always difficult but with time, operators and the industry will adjust. This is a significant change but with time, certified compost will be more fit-for-purpose.

SN enquired whether we will be providing the general feedback to everyone on the scheme and GP informed that this was not the plan though she will be providing general feedback to the operators that submitted their example SQCS/HACCPs. The plan is to circulate the 'CCS Position on Technical Requirements' document to all the CBs and check everyone agrees. It will then be circulated to the TAC for final comments before distribution to operators.

c. Sampling and testing projects

TA provided the TAC with an update on the sampling and testing related projects that he is undertaking for REAL. He explained that we are working to develop proficiency testing (PT) schemes for CCS and BCS, which will take approximately six months to develop.

We do not have scheme-specific PT schemes but will use bonafide UKAS PT scheme providers for all other parameters. We are setting up a meeting with relevant scheme stakeholders to discuss how to proceed. TA is producing a document that could be used for the tender process for scheme providers.

TA explained how he has trialled the physical contaminants PT scheme as inter-laboratory trials, trialling two different approaches for the test sample preparation. Another project is to review the test method for physical contaminant testing.

TA also provided an overview of the project he is working on to update the compost sampling guidance. This partly follows on from WRAP's work looking into sampling procedures and is also taking into account the update of the British Standard for growing media. TA has drafted the sampling guidance based on the Afor sampling guidance and is developing material for workshops on sampling. He will produce presentation slides from this guidance document.

He explained that he is trying to make it as simple as possible, considering operators are using different techniques. He will put the relevant boundaries in with the sampling guidance.

2. Update from the CBs

RL provided an update on one product complaint that had been received by OF&G, concerning compost contaminated with plastic. The farmer did not want to take the compost because it allegedly contained a lot of plastic and stated that he would no longer take compost from that producer. However, RL reported that the farmer had decided to spread the compost. OF&G was in contact with the local EA officer and has arranged a spot inspection but was waiting to receive the spot inspection report, so the investigation was ongoing.

No product complaints had been escalated to ACL since the last TAC meeting.

3. Update from the MDWG

GP provided an update on the discussions that took place at the first meeting of the Market Development Working Group (MDWG) in January.

The Terms of Reference had been discussed and will be published on the CCS and BCS websites along with the summary notes from this meeting.

GP explained that one of the key discussions was around the link and relationship between the MDWG and the Research Hub. SN commented that the MDWG will probably have a strong link with the Research Hub. GP provided an overview of this discussion and noted concerns of the potential conflict between the possible research proposals from the MDWG and the operators who may not wish to support the programme. One idea suggested is to look at producing a library of research and carry out gap analysis to identify areas for market development research.

GP will circulate the short version of the minutes when they are available.

Other actions from the MDWG include writing a paper/press release on the differences between EoW certification and quality assurance certification, and setting up a meeting with Defra directly to discuss the organic regulatory requirements.

The MDWG would like to tackle the issue associated with the Soil Association's view on certified compost and biofertiliser and the loss of market confidence. On this matter, RL advised that they have been discussing this with Defra for years but because Defra personnel change so frequently it is difficult to make progress. Defra are reluctant to go against EU law and persistently involve their lawyers. They now accept GMO food waste and food waste to IVC/AD plants, but they will not accept processed food waste and there is no provision for this in the EU regulations. Defra will need to address this question considering the amount of food waste expected to be sent to AD.

Finally, GP explained that REAL will discuss the MDWG's plans and the upcoming Quality Protocol reviews with operators at the CCS and BCS Forums. SN commented that we need input and response from producers immediately – we should involve them as early as possible.

4. Review of PAS 110

GP provided an update on the upcoming PAS 110 review. A workshop will be held for all industry stakeholders to discuss the review of the standard following the last BCS Operators' Forum, which provided a platform for operators to discuss this. The workshop will most likely be held in May to take into consideration all the other scheme-related events (the TAC, the Forums, the Research Panel meetings, and the MDWG meetings).

REAL would like to launch a survey and give the industry a couple of weeks to respond to the survey, followed by a couple of weeks for REAL to analyse the results. The workshop will then be held and open to everyone (including the regulators), with follow-up discussions at the BCS Operators' Forum, and the TAC will advise on the final proposal for the decision to be made in June.

SN commented that he has not noticed a lot of appetite for a revision of PAS 110. If there is no demand then we should consider this because it is a very expensive process.

5. Technical issues

a. BCS additives

GP provided an update on a recent enquiry from an additive manufacturer interested in finding out whether their product could be used under BCS.

GP explained that we are considering a system for assessing additives, but we are not sure what should be done. The Scheme Administrator and Certification Bodies are not able to assess whether the product additives are suitable but with the help of TA, we shall continue to investigate this issue.

PAS 100 has requirements for additives and the CCS Position on Technical Requirements document details how composters and CBs should assess additives but there is no equivalent for PAS 110 or the BCS Position on Technical Requirements.

AM suggested that we take this proposal to the Research Hub and look at the potential negative effects/impacts on digestate quality/safety from the use of these additives. TA advised that at this stage, we are raising awareness, but this is a topic which may need to be investigated further and might be sent to the Research HUB. He informed that the plant growth test helps to investigate the effects of additives on compost quality (even if it is not possible to specifically attribute a failure to the presence of additives) and highlighted that we do not have an equivalent test for digestate. There are several aspects for REAL to look at and an update will be provided at the next meeting.

JC asked whether we have contacted the manufacturers/producers of these products and she recommended two individuals (contact details to be provided).

FD informed that SEPA has received a similar enquiry concerning the use of an additive in the digestion process and would be interested to know the scheme's view on this and the outcome.

SN commented that the public's view is important even if the additive has a positive effect.

JC informed that most operators will be using some form of additive in the process.

NJ explained that there could be a problem with enzymes and bacteria that are harmful to human health; he will share details of a recent case in Northern Ireland.

6. AOB

AM raised an issue regarding product complaints and what these tell us about plastic contamination and the PC test method. She asked, "at what point do we stop signing off complaints when they have passed the test?" When should we have another look at the plastic limit? When do we stop accepting this material as compliant? We will come back to this at the next TAC meeting. We do not want to destroy the market. AM thinks we should reduce the limit. Should we propose to the Hub to look at the plastic limit? Where did the current limit come from? We need scientific evidence for limits. Could we reduce the limit with scientific evidence? TA commented that everyone is concerned about this.

RL informed that there was little appetite for reducing the limit during the PAS 100 revision project. AM advised that producers might not ask for this but others in the industry would.

GK posed a question for the CBs directly. He informed that he has visited many certified sites with windrows contaminated with plastic and has been astonished that they can make PAS 100. How can they meet the standard on plastic? What are the CBs' views on highly contaminated windrows?

NJ shared that he would look at their waste acceptance criteria and ask what their interpretation of 3 or 4 is in the scheme's template. RL agreed that OF&G would look at rejection criteria.

GK acknowledged that LAs are dumping bad material but what about the quality of the end material? Can you fail with a dirty windrow? NJ commented that the overall process is validated. It was stressed that we need to pay more attention to feedstock. GP will add this discussion to the agenda for the next meeting. SN informed that looking at previous minutes, plastic contamination has been a repeat issue and illustrates a need for action, especially with the upcoming food waste collections.

Close

Summary of Key Actions

- REAL to provide further explanation of the Research Hub at the Forum meetings
- REAL to circulate the updated 'Position on Technical Requirements' to CBs and TAC
- REAL to circulate MDWG summary notes to the TAC
- REAL to consider proposing the Hub funds a project(s) looking into AD additives
- REAL to add plastic-related discussion raised at this meeting to next meeting's agenda