



## 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

Friday 24<sup>th</sup> November 2017, 11.30 – 15.00, Orrick, 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; Julia Summers (JS) – NSF Certification; Roy Lawford (RL) – Organic Farmers & Growers (OF&G); Kat Rohts (KR) – Organic Farmers & Growers (OF&G); Nicholas Johnn (NJ) – Aardvark Certification Ltd (ACL); Duncan Rose (DR) – Laboratories' Representative; Kathy Nicholls (KN) – Environment Agency; Will McManus (WM) – WRAP; Cath Lehane (CH) – Red Tractor

### Teleconference:

Alison McKinnie (AM) – Zero Waste Scotland (ZWS); Fiona Donaldson (FD) – Scottish Environment Protection Agency (SEPA); Anita Roberts (AR) – NSF Certification

## 1. Introductions & welcome

Professor Stephen Nortcliff welcomed everybody to the meeting and noted apologies. Action points from the last meeting were discussed with the majority of actions addressed.

## 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 175 processes certified through the Scheme. Sites were processing over 3.7 million tonnes per annum of feedstock and producing almost 2 million tonnes per annum of *quality compost*. The amount of feedstock processed annually by certified sites increased throughout the year. Since the last TAC meeting in July, there were five new CCS applicants and one process was withdrawn from the Scheme after their certificate was suspended.

#### **b. BCS numbers**

There were 67 plants certified through the Scheme. Plants were processing over 3.2 million tpa of waste. A total of 49 plants were producing whole digestate, 24 were producing separated liquor, and 14 were producing separated fibre.

#### **c. Scheme developments – labs & testing**

REAL were reviewing the laboratory T&Cs after consulting with the Appointed Laboratories and Independent Laboratory Auditor. REAL had been revising the T&Cs since the last TAC and a new version will be issued from January 2018.

The BCS laboratories were reappointed after they were audited at the beginning of the year. The independent auditor provided letters of recommendation expressing that he would support a decision to renew the appointment of ATL and NRM.

The appointed laboratories were participating in inter-laboratory trials for compost and digestate physical contaminant testing. It is hoped that the results of the trials will provide more insight into laboratory performance and set out a basis for future proficiency testing schemes.

#### **d. Scheme developments – cost benefit analysis**

Two draft documents had been created to compare average costs for certified producers and average costs for waste producers spreading material on an annual basis. Members provided their views on the draft documents and expressed the view that the figures looked reasonable. It was suggested that it would be a useful exercise for the environmental regulators to evaluate the analysis. SN stressed that all the assumptions made in deriving the cost benefit outcomes of the analysis will need to be stated clearly.

#### **e. Scheme developments – ongoing**

New CCS and BCS bi-annual newsletters were being prepared to send out in December and provide interesting or relevant scheme-related news from 2017.

It was announced that UKAS accreditation will continue in 2018. The UKAS assessment report highlighted sections of the PAS and Scheme Rules that would need to be revised.

The Public Consultation phase of the PAS 100 revision started shortly before the TAC and a draft version was made available on the BSI website for comments.

REAL is hiring a Technical Manager who will join the team in 2018. They will focus on managing technical aspects of the Schemes and projects relating to compost/digestate analytical testing.

#### **g. Research Hub**

REAL are planning to set up a Research HUB. The objectives of the Hub are to ensure the Schemes' documents remain up-to-date with the technical developments in the industry, and to fund or support relevant/necessary R&D projects. Operators will be charged an annual research fee to fund or support Scheme-related projects. The initiative was widely supported and proposed charges considered reasonable. REAL will draft the Terms of Reference in 2018.

### **3. Updates from the CBs and labs**

#### **a. Update from CBs**

RL stated that one CCS producer had been withdrawn from the Scheme by OF&G since the last TAC due to non-compliances and an unwillingness to change their systems.

JS stated that no producers had been withdrawn from CCS or BCS since the last TAC/Oversight Panel. AR dialled in using teleconference facilities to provide an update on a complaint received by NSF. The complaint related to certified compost purchased by farmers. The customer alleged that the compost was contaminated with a lot of plastic. AR provided details about the investigation to date and the inspector reported that all of the QMS materials were considered compliance with PAS 100. GK advised that the farmers might have purchased the wrong grade. It was stressed that communication and dialogue between producers and users is very important. It was suggested that this could be more of a “fit-for-purpose” issue rather than a compliance issue.

NJ stated that Aardvark had no updates to provide at this TAC/Oversight meeting.

#### **b. Update from labs**

DR informed that the labs had received their results for the first round of pilot inter-laboratory trials. The next round was taking place within the week after the TAC. REAL was advised that the results will not be published as it would not be appropriate to publish results from “pilot” trials.

REAL will invite the independent laboratory auditor to the next meeting.

Panel members shared that more analyses might be required for spreading waste compost/digestate to land in the future. DR shared that NRM have created a document for all tests required when landspreading. The EA might require more analyses for soil testing in the future when deploying composts and digestates.

### **4. Updates from the representatives**

#### **a. Update from CCS Producers’ Representative**

GK suggested that there should be a ‘close out audit’ if producers decide not to renew but their certificate is valid for a long period beyond this decision date in order to confirm the quality of the product is maintained to the end of the certification period. RL stated that OF&G has arranged spot checks in the past prior to certificate expiry so they could cover this sort of occurrence with spot checks. KN assured the panel that EA officers will check e.g. their records, process, management control, and the EA will raise complaints with the CB if they identify standard non-conformances.

On the subject of the PAS 100 revision, operators are concerned about the possible increase in costs. With regard to contamination of commercial waste feed stocks, it is difficult for operators to turn down contaminated input loads as the suppliers will just go elsewhere. Whilst there is a wish to reduce the amount of plastics in the feedstocks and consequently composts, this will need to be a gradual process. If producers are required to meet more stringent revised limits overnight it will prove very difficult and they and the industry will suffer.

#### **b. Update from BCS Operators’ Representative**

JC informed everyone that landspreading regulations have not changed but the EA’s controls are becoming more stringent and there is a stricter approach towards spreading digestate. The agricultural sector is reporting higher levels of incidents with issues relating mainly to storage and transport of digestate. There has been reported; over-application of digestate in the autumn, more odour issues, storage problems, problems with contractors, growing number of incidents, storage and availability of N. Rate of spreading is starting to look like disposal activity.

The Panel discussed the market value of digestate and surmised that the value of digestate exists for landspreading contractors. We need to engage with the landspreading industry. REAL could contact

NAAC the certification/quality assurance scheme for landspreading contractors. CL informed the Panel that Red Tractor do sometimes require NAAC certification. REAL could also contact BAS – the Scheme might certify the producer, product, and spreader. REAL might consider only allowing spreading through NAAC certified spreaders.

## **5. Technical Issues**

REAL presented some relevant topics of discussion to the TAC/Oversight Panel based on enquiries received or issues that had been raised since the last TAC.

### **a. Ash dieback disease**

One of the CBs had been asked by a producer whether they could accept and process leaves infected with ash dieback. The Defra guidance is to leave contaminated material in situ. It should not be moved and transported. Spores become an issue when the contaminated material is moved around. New research on plant health makes it possible to identify dieback early in the autumn. However, producers might not be aware of or able to identify these signs. Litter from affected ash trees can be burnt under an exemption. There is advice about this on the DEFRA webpage.

### **b. New markets for digestate**

Several producers and manufacturers had contacted REAL regarding whether or not quality digestate can be supplied to the growing media/horticultural/topsoil markets. As a new non-waste digestate product has come onto the market for gardening, certified waste-fed producers are questioning how they could access this market.

KN questioned whether there is actually a market for digestate in horticulture etc. or are producers enquiring on a theoretical basis? AM suggested we should open up these markets rather than restrict producers and prevent opportunities for digestate use. It was questioned whether the EA could revise the QP. KN explained that the European Technical Committee needs to approve it and sign it off – it is not a simple and straightforward revision process.

### **c. AD boom in Northern Ireland**

It had been reported that there will be an AD boom in Northern Ireland within the next half decade. 103 AD plants had been approved in NI and REAL predict an increase in the number of plants applying to join BCS. RL stated that OF&G has already had some enquiries. KN informed that the EA would like to consider all changes to the ADQP simultaneously.

### **d. AD ammonia emissions**

Defra has become concerned over the growing contribution of ammonia emissions from the AD industry. It was discussed that storage tanks and covered storage are needed. EA will contact Defra to enquire which cover system they would like industry to use.

There are also issues associated with satellite stores and producers using different satellite stores. REAL will be communicating with operators about guidance on storage.

### **e. Testing dried digestate**

More operators are now drying their digestate but this has implications for PAS test results and the basis on which they are presented. Results for digestate are presented on a fresh weight basis but as drying technology have become more prevalent there are implications for testing this material and the presentation of results. It has been suggested that sample analyses should extrapolate figures

from tables 1-5 in PAS 110 with a correction for estimated fresh weight where dried digestate is presented for analysis. This will be explored further in the future.

#### **f. Biodegradable plastics**

Biodegradable plastics in AD systems continue to cause issues for producers. DR informed that NRM have tried using a chloroform method to detect biodegradable plastics but the method didn't work. GK also tried utilising his own test but this was also unsuccessful. The Panel discussed whether there should be different limits for biodegradable and non-biodegradable plastics. It was thought there would likely be little benefit to this as the biodegradable plastics will still remain visible in fields. AM shared that SEPA has undertaken work on biodegradable plastics in digestate and compost.

### **6. PAS 100 revision update**

The Public Consultation on the revision of PAS 100 had begun and a draft version of PAS 100:2018 had been published on the BSI website. It was stressed that we should share the news of the revision and public consultation as widely as possible to ensure people are aware and can contribute to the consultation before it ends.

#### **Summary of Key Actions**

- Environmental regulators to consider reviewing REAL CCS/BCS cost benefit analyses
- REAL to invite the independent laboratory auditor to the next meeting of the TAC/Oversight Panel
- REAL/CBs to send operators reminder about notifying their CBs if they are not renewing their certificates
- REAL to engage with NAAC and BAS regarding certification of landspreading contractors spreading digestate and compost
- REAL to consider that the schemes will only allow spreading by NAAC certified spreaders
- KN to contact Defra to enquire about the type of storage cover they would like AD industry to utilise when covering digestate to prevent ammonia emissions
- REAL to communicate with operators regarding rising ammonia emissions and guidance within the ADQP to minimise these emissions
- REAL to explore SEPA work on plastics in digestate and compost
- REAL to further publicise revision of PAS 100 and public consultation period to ensure awareness and input to the revision
- REAL to request NFU publish information about the public consultation on the revision of PAS 100 in Farmers Weekly
- RL to share public consultation on the revision of PAS 100 with OF&G CCS participants