



## Minutes for the CCS and BCS Technical Advisory Committee

Wednesday 30<sup>th</sup> March 2022

Teleconference

**Chair:** Stephen Nortcliff (SN)

**Attendees:** Jo Chapman (JC), Gregor Keenan (GK), Roy Lawford (RL), Sophie Arguile (SA), Nicholas Johnn (NJ), Sarah Pitcher (SP), Fiona Donaldson (FD), Simon Thorpe (ST), Gillian Mannix (GM), Thomas Aspray (TA), Emma Laws (EL), Georgia Phetmanh (GP)

### 1. Update from REAL

#### A. Scheme Status

On CCS, there were 176 certified processes, one fewer than the November TAC meeting due to one site having a suspended certificate. There were 137 processes in England, 21 in Scotland, 11 in Wales, 6 in Northern Ireland, and one in the Republic of Ireland. There were approximately 4.1 million tonnes of inputs processed per annum (up 0.06 million tonnes pa from November) and approximately 1.84 million tonnes of quality compost produced, which has not changed from the last TAC meeting. Since the start of 2022, there has been one applicant to CCS and 0 withdrawn.

On BCS, there were 99 certified processes (this is unchanged from the November TAC meeting), and one site is currently suspended. There were 71 certified processes in England, 13 in Scotland, 8 in Wales, and 7 in Northern Ireland. There were approximately 5.01 million tonnes of input processed per annum, down 0.9 million tonnes per annum compared to the last TAC meeting. There have been no applicants or withdrawals since the start of 2022.

#### B. UKAS Accreditation

All three certification bodies are now UKAS accredited to ISO 17065 for certifying against CCS and REAL is working with UKAS for the process of reviewing the BCS documents.

#### C. Compostables Labelling Guidance

REAL have created a guidance document for identifying compostables. This was put out for public consultation and REAL are currently working through comments. The REA and BBIA have both given feedback and support this guidance, REAL has also received comments from GK and other producers at the Producer's Forum on the design of the label, in particular feedback on the need for easy differentiation between home and industrial compostable (preferably by colour).

REAL will next be consulting directly with sites that accept and process compostables.

#### D. Covid-19 Audits

Since the last TAC meeting, REAL held another auditing review meeting with the environmental regulators. Following this meeting, it was agreed that remote audits under exceptional circumstances can still take place in Northern Ireland until 31<sup>st</sup> March. This is expected to lapse, REAL and the environmental regulators do not foresee a continuation in remote auditing going forward.

#### E. Sample Transit Times

One action from the previous TAC meeting was for REAL to produce guidance or a clarification note for operators on sample transit times. TA confirmed that this was developed and sent out to operators on both schemes; the note provides advice on what is or is not acceptable.

#### F. Laboratory T&Cs and Laboratory Reappointment

The yearly review of the Laboratory T&Cs was conducted, and the T&Cs revised in November 2021 after REAL engaged with both the labs and the CBs. The most significant changes are the introduction of the requirement to participate in the LGC Animal Feeds Proficiency Testing Scheme (AFPS) for microbial pathogens. This replaces the VETOQAS scheme and uses a real matrix rather than freeze-dried ampoule. The AFPS scheme is more robust and delivered by a UKAS approved provider.

#### G. BCS PC&S Method

TA explained that the BCS has never had a bona fide Physical Contaminants and Stones method. NRM have contributed to finding the original method. The current version used under BCS are SOPs which are referenced in PAS 110. This is something to be changed in future revision of PAS 110. A new method has been drafted and sent out to the labs for consultation and is being finalised.

Discussions with WRAP and DEFRA regarding ownership of the IP are ongoing.

#### H. REAL PT Programme Research Project Proposal

There have been a number of discussions at the TAC in the past about proficiency testing for Scheme Specific methods. REAL had previously tendered to find someone to develop and deliver this scheme but this was unsuccessful. REAL has now submitted a research proposal to the Research Hub to find a contractor that could develop the best approach to assessing scheme specific tests. TA noted that one challenge may be the limited number of participating labs.

## 2. Update from CBs

#### A. NSF

SA informed that NSF have received no product complaints and are continuing to train new staff.

#### B. ACL

NJ also reported no product complaints. ACL are training and signing off two new auditors: one covering Scotland and one covering Northern Ireland. This will make audits easier to arrange as they will not need to travel from England.

#### C. OF&G

RL also had not received any product complaints and informed the TAC that OF&G are also in the process of training new inspectors.

### 3. Update from Approved Laboratories

SP had nothing new to report from the labs but added that the transit time clarification note had been very useful.

### 4. Update from PRT TWG and MDWG

#### A. PRT TWG

The PRT TWG met for the first time in March since mid-2021. The group discussed the 3<sup>rd</sup> project of the Research Hub, the proposal for which was submitted in part by the PRT TWG. The project had received no responses to the tender and REAL were seeking comments from the group as to why this may be. The group also discussed the potential for a future project investigating different plant response tests (e.g., Spring Barley and Field Bean) and their appropriateness for different markets.

**ACTION: TAC to share any additional comments or suggestions with Megan, the Research Hub Manager, on why we received no tender submissions for the PRT research project**

#### B. MDWG

The MDWG are due to meet on 7<sup>th</sup> April.

### 5. Technical Issues

#### A. SEPA Plastics Issue

GP explained that when conducting data analysis internally, REAL noticed that a small number of tests were reported as passes but failed the SEPA plastic limit. REAL contacted the CBs to check how these were assessed by the CBs. The CBs confirmed that they have been checking against SEPA limits but had missed these results; there were 5 missed on CCS and 8 on BCS. Some of the operators also had mis-assessed the results and REAL are awaiting information on the others. The areas of the scheme which could be improved, therefore, are in notifying CBs of results and in reporting of results by the labs. The labs currently report pass/fail against the PAS limits only and it is up to CBs and operators to check against the SEPA plastics limit if applying/certified to End of Waste Scotland.

REAL are currently managing this by manually monitoring all results from Scotland as they are reported to the central database. REAL have engaged with the database developer and are looking to automate this process so that the database notifies the CBs directly. REAL are also working with the labs to produce a note for the test reports which explains the differing limits.

These are interim solutions; longer term REAL is considering changing the reporting template so that results are displayed alongside a table of limits without the pass/fail column.

GK queried if the form for producers could be amended to mark that they want to be tested against the SEPA limit, the same way producers select whether they are producing mulch or not. SP answered that the labs conduct PAS testing, and are UKAS accredited for PAS testing, changing to assess against different limits could be a challenge. Additionally, amending the reporting template will take a long time due to the programming involved at the labs.

SA asked if it would work to have two pass/fail columns, one for PAS and one for SEPA's limits, adding that without the pass/fail column and just with reporting the results with a table of limits, the

chance of human error is greatly increased, and this likely wouldn't be picked up until the CBs yearly auditing. FD agreed commenting that this is important as we don't want end users receiving material that they believe meets standards but doesn't. It is a concern that people might inadvertently be given waste material due to human error. Especially if the material is going to, for example, QMS, we do not want someone to lose their QA status due to the way results are reported not being clear.

SN asked what the timescale is for implementing the longer solution. GP stated that REAL do not know this yet but estimate that it will be in 6 months' time or longer.

RL suggested that we should be aiming towards the lab reporting a pass as a pass, rather than the producer having to assess against each limit and queried what the barriers to doing so would be. SP responded that it is the cost and IT resources required to do so. TA added that it was discussed 3-4 years ago at a TAC meeting whether the labs should assess and report against several limits, but it was decided reporting pass/fail against both would be confusing. Potentially there could be a different reporting template for Scotland, but this raises the issue of what to do about compost/digestate that is crossing the border. SP expressed that it would have to be made very clear by the producer/operator which limit they wanted, the lab should not be responsible for this.

GK noted that presentationally it may look bad if end users in England see the material that they are purchasing would still be considered waste in Scotland.

JC asked if the outcome of the QP revisions would change the limit for English operators anyway? Would it be aligned with the limits in Scotland? GP confirmed that the EA are intending to lower the limits, but it is unknown to what extent, or what the timeframe is for revision to be completed and implemented and REAL considers we should not wait to resolve this issue.

**ACTION: REAL to consider comments and suggestions from the TAC on resolving the SEPA plastics issue long term and report back to the TAC the decision on a long-term solution**

## B. Frozen Compost Samples

REAL were alerted by a lab to a compost sample they had received in a frozen state that did not appear to have frozen accidentally in transit. This was considered and REAL did not believe it was suitable for testing, it was discussed with CBs, and all agreed that samples, while they should travel cool, should not be frozen. In this instance it was a genuine mistake made by the operator, a clarification note will be added to the technical position – frozen samples are not acceptable.

## 6. AOB

### A. Update on QP Revisions and EU FPR

GP delivered an update on the QP revisions: since the last TAC, the first meetings of the Task and Finish Groups have taken place – they were held in December.

The Task and Finish Group consists of representatives from Defra, the environmental regulators, trade body representatives, CIWM and NFU. From these meetings, we can report that the trade bodies are working together, and they presented their comments during this meeting, primarily around additional markets for compost and digestate and revision of Appendix B.

The group considered UKAS' comments during the meeting which REAL had received through UKAS' review of the CCS scheme documents. The introduction of specific criteria for different markets was discussed – different quality requirements for materials being supplied to different markets. Additionally, the virgin comparators for compost and digestate were questioned (whether it should be peat or coir for compost). Test methods and plastic limits were also discussed – there are intentions from the EA to lower the plastic limits, so this was expected. Finally, there was also discussion around the manure-based digestate position statement – the scope of the ADQP has been considered and in this respect, whether the ADQP should include different types of digestate.

RL queried if there had been discussion around dried digestate, and GP responded that she would find this out and confirm.

GK commented that producers will be pleased to hear that the EA are considering the virgin comparators, as in his opinion the comparator for compost going to agriculture should not be peat; looking at the virgin comparators suggests there will be maybe more consideration of end markets in the revised QP.

On the EU FPR, GP informed the group that Defra will be putting forward a proposal for a modified FPR, but it will be some time before this is out for consultation. We are waiting to hear what position Defra will be taking.

**ACTION: REAL to check if dried digestate was discussed during ADQP revision T&FG meeting**

#### B. Fertiliser Query

ST raised that he had been approached by a manufacturer, based in Cambridge, with novel products for applying to compost, ST wanted to ascertain if it would be useful to invite this manufacturer to the next TAC to discuss products that do not fit into the existing definitions of compost/digestate as there seems to be a growing industry that don't fit neatly into either category.

ST then gave further detail on the manufacturer in question: they are called 'Just Soil' and their product seems to be a spray containing microbes which speeds up the breakdown of material.

SN commented that he would like to know more information about the product, do the regulators know about it, and does this company operate within the same strict limits/process and CCS sites?

GK suggested that this is of interest to the group if it is used within any CCS process, otherwise it is the same as any uncertified composting site and outside of the scope of the TAC.

FD agreed that more information is needed, from the point of view of the regulators they would like to know what its purpose is, the impact of it when spread to land and is it adding new microbiology into the soil. TA added that considering the microbiology, are the microbes being added the same as the existing microbes in the compost or is it not already there and in which case will it be destroyed by exiting microbes.

ST agreed that more information is needed and that he will continue engaging to try and gather answers to these questions.

**ACTION: Simon to obtain more information from manufacturer on the Just Soil product and consider whether it would be beneficial for discussion with TAC members in June**

**ACTION: Simon and Stephen to discuss the firm in Cambridge Stephen is familiar with re the Just Soil product**

C. Holding all TAC meetings online

SN and GP asked the TAC to consider how they would like future meetings to be held, with the options of hosting all online or hosting two in person with the catch up online. SN expressed that in his opinion greater progress is made in person, but he understands the challenges of travelling to meetings. GP asked that the group think on this and get back to REAL on their preferred format.

**ACTION: TAC to share thoughts with Georgia and Stephen on whether to hold longer TAC meetings face-to-face (in London and Edinburgh), online, or take a hybrid approach (in-person and virtual option)**

## Actions

- TAC to share any additional comments or suggestions with Megan, the Research Hub Manager, on why we received no tender submissions for the PRT research project.
- REAL to consider comments and suggestions from the TAC on resolving the SEPA plastics issue long term and report back to the TAC the decision on a long-term solution
- REAL to check if dried digestate was discussed during ADQP revision T&FG meeting
- Simon to obtain more information from manufacturer on the Just Soil product and consider whether it would be beneficial for discussion with TAC members in June
- Simon and Stephen to discuss the firm in Cambridge Stephen is familiar with re the Just Soil product
- TAC to share thoughts with Georgia and Stephen on whether to hold longer TAC meetings face-to-face (in London and Edinburgh), online, or take a hybrid approach (in-person and virtual option)