



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

Wednesday 30th October 2019

Attendees:

Professor Stephen Nortcliff (SN) – Chair; Georgia Phetmanh (GP) – REAL; Molly Rogers (MR) – REAL; Thomas Aspray (TA) – REAL; Gregor Keenan (GK) – CCS Producers' Representative; Sophie Arguile – NSF; Roy Lawford (RL) – Organic Farmers & Growers (OF&G); Duncan Rose (DR) – Laboratories' Representative; Fiona Donaldson (FD) – Scottish Environment Protection Agency (SEPA);

Teleconference:

Mark Foxall (MF) – LARAC; Kathy Nichols (KN) – Environment Agency; Alison McKinnie (AM) – Zero Waste Scotland (ZWS)

1. Welcome and Apologies

- SN welcomed everyone to the meeting and started with roundtable introductions. He welcomed Mark Foxall from LARAC to the TAC, who joined by teleconference.

2. Minutes and actions from the last meeting

[REAL to correct typo in CCS Position and disseminate to scheme participants](#)

- This has been completed.
[REAL to consider materials for sampling guidance/training](#)
- REAL hosted a sampling workshop in October in Edinburgh and plan to host more in other locations in the UK. Webinar platforms are being looked at by REAL currently.
[REAL to consider opening CCS sampling workshop to BCS operators producing fibre](#)
- The first workshop was limited to compost producers in order to measure the success of workshops. REAL to consider inviting AD operators to future workshops going forward.
[DR and GP to liaise about timescales for uploading sample type data and PAS 110 test results](#)
- The deadline for this is the end of 2019. NRM and ATL have almost completed programming to upload data and will be trialling uploads soon.
[REAL to wait for Agency's timescale for ADQP review and gap analysis](#)
- REAL were planning to send a letter to BSI at the end of year but this has been postponed until Jan/Feb next year. REAL are waiting for the outcome of ADQP and CQP reviews.
[REAL to update ToR with suggestions and circulate to TAC](#)

- This has been completed and updated to cover one TAC for CCS and BCS.
[KN and TA to discuss compost on-site sub-sampling based on proposal](#)
- The issue of subsampling on site was discussed at the summer TAC meeting. KN and TA discussed this issue afterwards and the conclusion was that sub sampling is not permitted.
[NSF to find out more information from operators regarding discharging of liquor to sewers](#)
- This operator is not certified anymore – the certificate was withdrawn.
[REAL to consider assessment process and document of approved additives for BCS](#)
- REAL published a position paper applied for all additives under the scheme. Responsibility falls to the operator to assess whether an additive should be used based on HACCP assessment.
- Requirements for the use of additives should be considered for the PAS 110 revision, whether additional to HACCP requirements or specifically for additives.
[REAL to continue looking at PSD data and guidance for CBs](#)
- TA is continuing this work.
[REAL to find new contact at LARAC and continue to invite to TAC meetings](#)
- LARAC were present at the November TAC meeting via teleconference.
[REAL to update BCS Position on separation/screening and circulate to TAC](#)
- This has been completed.

CCS and BCS updates

Scheme numbers

- Discussion around whether local authorities (LAs) are made aware immediately if certificates are withdrawn. If the material produced is no longer certified, this affects the supply of waste and must be treated in a different manner.
- MF commented that LAs notice that if there is a process that *should* be happening to waste and it doesn't, householders lose confidence or don't participate in correct waste practise. There should be a link with regard to how the information is fed back to the LA.
- KN noted this issue can be improved on. If there is a complaint this is forwarded to REAL. Local authority teams are made aware that operators might be applying for deployment.
- There needs to be forewarning ahead of audits which need to be completed in advance of the certificate expiry date.
- Certification Bodies are responsible for updating the REAL CCS database, which is updated on a daily basis.

Sampling workshop

- REAL issued sampling guidance and on 25/10/2019, held a half day workshop at a composting site in Edinburgh.
- There are plans for more workshops following positive feedback from attendees (mixture of operators, auditors and CBs) and REAL will host events next year at different locations.
- Subsampling has been an issue in the BCS sampling guidance. TA explored the large incremental subsample numbers in the existing guidance and from where they originated. Appear to come from German BGK compost document.
- There are plans to circulate draft BCS sampling guidance to the TAC. Training on the guidance would be a one-hour webinar - it is too challenging to hold a physical site-based workshop for digestate.
- Subsampling for PAS 110 (pathogens and PCs) must be done from a 1L bottle on its collected separately. Laboratories say they are receiving different containers already for this.

- Interpretation of test failures- webinars would be organised to help understand test results. This webinar would not be training, but advice for operators on how to understand failures. Information would be collated from CBs later, on corrective actions.

Laboratory audits and PT schemes

- REAL are in the process of setting up a proficiency testing (PT) programme for scheme specific tests.
- Additionally, a laboratory approval scheme also set up by REAL, is in its initial stages. This scheme will involve CBs in the approval process of the laboratories managed by REAL.
- The scope of the audits will be revised to focus on scheme-specific tests, in terms of test method witnessing. The laboratories will be required to obtain UKAS accreditation for the standard (non-scheme-specific) tests.

UKAS accreditation

- The CCS contracts were renewed. REAL decided not to tender this year for CCS and only existing CBs will be able to apply for pilot UKAS scheme. There will be a tender process for BCS.

MDWG Update

- The Market Development Working Group (MDWG) discussed the opportunity of Green Funds for wider marketing related work and how to communicate the development of the QAS to the markets.
- The MDWG and the Soil Association discussed the opportunity for a list of 'A-grade certified producers' who provide a product with little/no plastic content. The Soil Association also announced that compost and digestate feedstock can now be from commercial kitchens, which was previously not accepted. There are heavy metal limits for this type of feedstock.

QP survey

- KN confirmed that the EA are going to send a letter to trade bodies, REAL, and producers regarding a call for evidence which will measure the need for a review of the QPs. This call for evidence will scope out the extent of the review requested by operators and further be costed out by the EA.
- The QP reviews have taken longer than expected - there is progress but not at the pace anticipated so the timescale has been extended.
- The MDWG issued a survey to gather views from operators on the QP reviews. This survey asked for views on waste inputs with evidence to support suggestions. There were a small number of responses to this survey which will be analysed by REAL.

Update on the Research Hub

- SN proposed that the original plan for the second project of the hub (3 project proposals combined into a single project) was too broad to offer a feasible research project and suggested to limit the second project to just one of the proposals; the reduction of plastic and other contaminants in compost and digestate feedstocks. Comments from the Panel are necessary before this decision is made.
- The third meeting of the Research Panel took place on 29/10/2019.

Update from the Certification Bodies

- OF&G had one complaint from NRW. A sample of compost was taken on the farm that the complaint was from. There were no non compliances with the composting process and the sample passed all tests- the complaint was signed off.
- There was another open complaint from OF&G which has not yet been signed off. The complaint concerned a lagoon at a farm where there have been spot inspections. The problem has not yet been solved but the EA plans to look at this further and visit the site.
- NSF had one outstanding complaint regarding physical contaminants on an AD site. NSF are still waiting to spot check and be provided with corrective evidence.
- NSF also had two CCS complaints. A member of the public complained about stockpiles contaminated with physical contaminants. The site responded and said that they were aware of this issue and were trying to keep on top of PCs.
- Second complaint - a landscaper had taken an additional grade as growing media and there was no plant growth test done on this compost. The plants did not germinate as well as the landscaper had hoped. The product was a soil improver not growing media which is a cheaper product.
- Product complaints recorded in audit reports since the start of the year have been significantly lower than expected. There were approximately 90 CCS audit reports and there have only been a few product complaints flagged in reports.

Update from the approved laboratories

- There is an urgent need to prompt producers to use the updated BCS analysis request form. From 1st January 2020, if the old form is used the samples will not count towards certification
- Laboratories agreed to put copies of the new forms in sample boxes. REAL must ensure that the version on the website is the most up to date version, as this will be the one that the laboratories are extracting for sample boxes.
- Terms of data were discussed with D&F eg. Sharing of data from the database, T&C's and sharing data with third parties. There is specific information around data sharing in the T&C's which includes sharing of test results.
- Certification Bodies only have access to test data which concerns the processes that they certify.

Update from CCS producer representative

- The requirement to ask customers about additional requirements is an issue that keeps recurring- producers think this undermines the scheme. There was a suggestion for ORG or REAL to come up with standard wording or statement to use for this part of the scheme.
- NRM is waiting to roll out a new method across operators concerning sub sampling. The samples are sent to one lab and these are passed onto another for specific tests. This procedure is currently being trialled.
- REAL to incorporate a transitional period following updates to scheme rules or documents which require operators to make changes prior to an audit. In order to align with UKAS, the suggested period is 3 months.
- A workshop on checking quality requirements and HACCP for operators and CBs is welcomed by operators.
- Operators asked at the producer's forums if they could see waste suggestions for the QP reviews that have already been submitted to the EA. EA are able to give blind, broad, details of waste codes that have already been submitted and are broadly not accepted.
- There were questions from operators regarding whether agricultural grade limits and parameters are appropriate to their end use. There was a suggestion that the plant response and stability tests were not applicable in agriculture by operators at the forum.

- Effective communication with operators was an issue flagged at the forum. Important updates should be sent out separately and should not be included in general newsletters or with other updates.
- Issues raised regarding the plant response test. Producers do not know the reasons for plant top growth test failures or the appropriate corrective actions following a failure. The test was set up for horticultural use so it is not appropriate for agriculture. Current rules state that product cannot be sent off site until test results are back which causes problems when operators wait for results as this test might not be relevant for the market. PRT was flagged as a problem for producers.

Update from the BCS forum representative

- Jo Chapman (BCS operators representative) may be stepping down from the TAC. REAL to seek replacement or an individual to support Jo.
- There was an EA report on pollution incidents with digestate. Operators queried whether REAL could comment on this document. EA representative informed that this report was not about digestate specifically, more about industry in general. This has now been published and there was no opportunity to comment.
- Discussion at the BCS operators forum regarding dried digestate. GP clarified that dried digestate cannot be certified. Operators think this was a misunderstanding at oversight panel meetings with EA present and this news has not been shared with operators. There are currently four AD plants producing dried digestate.
- End uses of digestate were discussed at the BCS forum and a research proposal will be submitted to the Research Hub by JC and another AD operator representative.
- Operators felt the need for clarification of the BCS position on testing SL. The use of the word 'particle' in the statement is confusing and this statement should read 'plastics or contaminants'

Technical Issues

a. Home compostable packing/non-packaging products

- At the PAS 100 steering group meeting, the project management team for PAS 100 was incorrectly advised by the packaging industry that home compostable standards require conformance with BS EN 13432. PAS 100 and CQP are now not currently aligned.
- The CCS position was updated to state that if operators accept home compostable it must also be certified to a required industrial standard. However, large retailers e.g. Waitrose have introduced packaging materials that are only certified home compostable and are instructing consumers to dispose of bags in waste streams destined for organics recycling. This issue was covered at steering group meeting, but the outcome of discussion wasn't recalled, the trade body requested derogation to allow home compostable packaging to be allowed under the scheme again.
- KN commented that advice that was given is wrong and this issue needs to be tackled. 'Home compostable' bags cannot go in a food waste bin if the waste goes to an AD plant.
- This is a big issue for local authorities. If you are only able to compost these items at home, it is contradictory to state they are suitable for industrial composting process. This advice is a result of mislabelling -the bags will compost but it takes a very long time.

b. Defining compost grade/PSD results

- There have been issues with the 0-40mm grade. There is large variation in the minimum and maximum data for 0-40mm grade. Samples in this grade size were tested and PSD is inconsistent. REAL will work with CBs to understand why products are labelled 0-40 if they are on the bottom end.

AOB

- Questions raised regarding PAS assured vs PAS product. If a waste fed site applies for PAS assured, there is a risk for the reputation of the scheme. There are conceptual issues currently with PAS 100. This issue will be discussed at the MDWG, but there have been no applications thus far.

Actions:

- GP to send previous TAC minutes to LARAC
- REAL to correct outdated reference to PAS 110 in section 6 of CCS Position
- Environment Agency to consider mechanism of informing local authorities of the loss of certification
- REAL to find out from Nick more details about the RBP test issue with the withdrawn certificate
- REAL to look at BAS guidance for digestate sampling that DR will forward
- REAL to discuss with CBs their contribution to the laboratory approval scheme
- KN to chase EA officer about concerns raised with OF&G regarding two compost sites
- KN to follow up with local officers about complaint concerning the lagoons
- REAL to send another reminder about the use of compost and digestate analysis request forms
- NRM to consider adding request forms to boxes
- REAL to finalise accreditation requirements and communicate deadlines to labs for applying
- REAL to check T&Cs are aligned with scheme rules for the supply of test results to the CBs
- REAL to set implementation timeframes for changes to CCS/BCS Position docs
- KN to supply list of wastes the Agency has turned down for the QP reviews
- REAL to consider how to ensure important emails are read by operators
- REAL to set up TWG to focus on plant response test issues raised at CCS Forum
- KN to provide REAL with Ian Martin's contact details for TWG
- KN and GP to discuss the certification of dried digestate fibre after TAC
- REAL to consider advice from TAC to send letters to retailers advising them to change their disposal instructions for compostable packaging
- REAL to continue working on PSD data analysis and guidance for CBs with a plan to issue guidance next year
- FN to provide REAL with more information about one lab not notifying an operator of an e. coli failure for four weeks
- REAL to discuss the development of the QAS with the environmental regulators