



## Summary Notes from the Technical Advisory Committee Meeting Teleconference

**Wednesday 31<sup>st</sup> March 2020**

### Attendees:

Professor Stephen Nortcliff (SN) – Chair; Georgia Phetmanh (GP) – REAL; Molly Rogers (MR) – REAL; Thomas Aspray (TA) – REAL; Gregor Keenan (GK) – CCS Producer Representative; Jo Chapman (JC) – BCS Operator Representative; Sophie Arguile – NSF; Roy Lawford (RL) – Organic Farmers & Growers (OF&G); Nick Johnn (NJ) – ACL; Sarah Pitcher (SP) – Laboratories' Representative; Fiona Donaldson (FD) – Scottish Environment Protection Agency (SEPA); Kathy Nicholls (KN) – Environment Agency; Alison McKinnie (AM) – Zero Waste Scotland (ZWS); Eugene Kelly (EK) – NIEA; Julie Tate (JT) – NRW

### 1. Update from REAL

#### Status of the Schemes

GP reported that on the CCS, there were 181 certified processes in the UK (141 England, 22 Scotland, 12 Wales, 6 Northern Ireland). A total of 3.8 million tonnes of feedstock is processed on an annual basis under the Scheme and 2 million tonnes of *quality compost* is produced on an annual basis. On the BCS, there were 85 certified plants/processes and 4.6 million tonnes of throughput materials processed annually under the Scheme.

Since 1<sup>st</sup> January 2020, there had been one application and one withdrawn certificate on the CCS and three applications to the BCS. As of January 2020, REAL now receives all PAS 110 test results in the database for certification purposes. REAL is in the process of finalising the Data Sharing Policy, which sets out the technical data that REAL stores and under what circumstances it is or is not shared. REAL has also devised a Data Request Form in addition to the Data Sharing Policy.

#### Laboratory Approval Scheme

This scheme has been set up by REAL and involves the Certification Bodies in the approval process of the laboratories appointed to test compost and digestate under the Schemes. Following the previous TAC meeting, the LAS has been incorporated into the Laboratory Terms and Conditions. REAL and the Certification Bodies participate in monthly conference calls in order to discuss any laboratory or testing related issues. An independent auditor for the laboratories has now been appointed by REAL, though the contract has not yet been signed. An announcement will be shared soon.

## Plant Response Test TWG

The Terms of Reference for this group have now been developed. The group is formed of two producer representatives, REAL, and environmental regulator representatives. Matthew Chapman and Gregor Keenan are the two compost producer representatives invited through a selection process and the environmental regulators have now received an invitation to join the group.

## Stakeholder representation

There will now be a representative from the NFU sitting on the TAC in place of Anna Simpson, who will join the summer meeting. Also Nicola Frost, a certified operator, will be joining Jo Chapman to share the role of the BCS Operator Representative. Both Nicola and Jo will attend BCS Forum meetings, and alternate attendance at the TAC, MDWG and Research Hub meetings.

## Scheme Rules

The CCS and BCS Scheme Rules are currently under review, with an aim for REAL to revise both documents this summer. REAL will open a consultation period for the review.

## 2. Update from Certification Bodies

### OF&G

RL reported that they were going ahead with remote inspections. There are four inspectors that work for OF&G and three were self-isolating at the time of the meeting.

There was one complaint on the CCS. It was not clear how the site should be sampling- shredding is done on one site and the material is sent to the site that will use the compost to be sanitised and stabilised to be further screened and spread. The material goes around in rotation and the EA officer advised that the material at each site should be sampled each year. RL clarified that each site is inspected every year but is not sampled and asked whether sampling should be done based on input tonnage or based on the site. The TAC advised that it was best for the operator to discuss with local officers and consider a solution locally.

There was also one complaint on the BCS to a council concerning the odour of material once spread on land. This complaint was signed off one year ago. The council were not reassured that the site had given an adequate explanation. A further spot check of the site was carried out and the producer provided an email that had been sent to the Council concerning stability; the site had passed on all parameters. The spreading is done by a trailing shoe, but the council was concerned that the odour was too strong.

### ACL

NJ reported that their first virtual audit was scheduled for 1<sup>st</sup> April 2020 using Microsoft Teams as a platform to conduct their audit. There was a new applicant to the scheme who was going to be audited in the same remote way, with a site visit planned for later in 2020. There were no complaints for CCS/BCS to report from ACL. One CCS certificate had been withdrawn as the producer did not renew, they are likely to renew their certificate. There were two new applicants to BCS and one applicant to CCS at the time of the meeting.

## NSF

SA reported that NSF were setting up remote audit training for assessors the week of the meeting for and remote auditing would be rolled out from there. In the last 12 months, there had been one complaint on BCS concerned with plastic contamination. A spot check of the site was carried out and the assessor was not able to see the contamination on site and all the PC levels were under the limit. The lagoons where the material came from were brought into question.

There had been three CCS complaints; two official complaints and one through an audit report. One complaint concerned bone fragments and plastic within compost. The auditor was not able to assess the stockpile that was referenced in the complaint as the material had already been spread. The assessor did a general spot check and there was nothing to note of concern. SA highlighted that tracking the source of compost is very difficult as there is a variety of inputs. The final complaint was from an audit report which was raised with the composter. The complaint concerned PCs and the action following this was that the site must check requirements with the composter.

### 3. Update on the MDWG

GP reported that the third face to face meeting of the MDWG took place in January in Edinburgh. The focus of the meeting was the Quality Protocol reviews. The MDWG worked through the call for evidence questions and composed their contribution to REAL's consultation response.

The MDWG provided comments at the meeting surrounding updating the ADQP, such as new digestate markets and technologies. The views of the group were supported by survey responses that were sent to all operators on the Schemes. The MDWG did not consider any aspects of the QPs too onerous and proposed any changes to the QP would need to be auditable. The MDWG also submitted their outstanding concerns regarding the QP's with requirements that are not considered auditable and ensuring that the schemes are aligned with the QP's as an end of waste framework.

GP also noted that there was an upcoming MDWG teleconference to discuss how they could further contribute to the QP reviews and invite operators/industry to discuss. REAL is also in discussion internally regarding contribution to the QP reviews.

### 4. Review of PAS 110

REAL have decided not to initiate a revision to the PAS 110 standard, following the review that commenced in 2018. Despite there possibly being a need for some aspects of the standard to be updated, REAL considers that now is not the right time to take a revision forward. The launch of the Research Hub and survey responses from Scheme participants also justified the view that now is not the right time. REAL sent a letter to discuss the findings of the review, and a virtual meeting between REAL and BSI took place that day (31<sup>st</sup> March).

### 5. Technical Issues

#### Covid-19 comments

- Green waste collection has mainly stopped in all councils.
- There is increasing worry in the AD sector regarding contracts with feed in tariffs. There have been pleas from the AD sector to get maize and silage. There is concern regarding how digesters will be refed which needs to be considered.
- MPS are aware deployments will take priority and that there is some backlog with deployments.

- All site visits have been suspended.
- There are several regulatory position statements being drafted in the waste sector and the EA are to accept temporary certification.

#### Update from Scotland

FD noted that there are regular meetings being held with government to assess how resources can be pulled from other sectors to track how material coming from households can reach sites. For Local Authorities, personnel may be pulled from other areas to get material to site.

If waste is ending up in black bins, this poses an environmental health risk. There is concern from Public Health England that there is a risk posed within the food waste and a question of whether Covid-19 can survive the pasteurisation process.

#### Update from Wales

JT noted that there have been a number of regulatory position statements and there are no site visits being carried out by NRW. Wales currently have no issues with deployments but there has been an issue with Local Authorities making their own decisions on collections. NRW plan to meet with LA's to understand what is and is not being collected. One LA stated that they would not be collecting any food waste, which had major consequences for an AD plant. There are also supply chain challenges in the poultry and egg sector, as there is high demand for these products in the supermarket, but there is much discussion surrounding egg wastage in pockets of Wales.

#### Update from Northern Ireland

EK noted that the main AD plant was down to 60% production. The restaurant sector was the main cause of this. All plants are operating but on a reduced scale.

#### Oversize and coarse composted material

Grade and PSD data is coming back from the laboratories. During the Certification Body roundtable meeting in March, TA shared this anonymised data with CB's and inspectors. There was lengthy discussion around screens and correct grade screens. The outcome of this issue/discussion will be to put an informative document together to use as a resource. Feedback on anonymous analysis where an inspector has asked a question, has led to a non-conformance.

There was a proposal submitted to the Research Hub in the latest call for proposals that concerns coarse composted material. SN has been given the task of contacting the proposer to obtain further information about the intended goal of this proposal. Emily Nicholls (REA Organics) produced a document in 2016 on oversize material.

#### Test failures and corrective actions

It has been noted that producers on the CCS have difficulty understanding test failures. There has been confusion on corrective actions around failed batches and the general quality management system protocols. Operators struggle to understand the consequence of failed test results. REAL plans to host a webinar on 'understanding test failures'.

## 6. AOB

SA raised an issue concerning a site applying to join the scheme which is currently already certified but the permit was under another site's name. SA questioned whether this was permitted. KN clarified that the permit should have been transferred into the company's name, so this site does

not technically have a permit. KN and SA to discuss outside of the teleconference to explore this issue further.

An issue surrounding plastic limits on the standard rules consultation was raised. There was a suggestion to the Agency that the limit on plastics was tightened on the consultation. KN clarified that there are two lines of waste types (supermarket package and curb side collection). There are few food processing plants on standard rules permits and these are typically under bespoke permits. There was an agreement that action needed to be taken regarding cleaning up feedstock, the front and back end must be tightened up.

EA is due to publish an immediate position statements on what the backend should look like and this will be on a staged timeline. TAC members commented that over a 5-year process, we must see a decrease in plastic on the front end of a standard rules.

**End**

#### Actions

- AM to report back to TAC following discussion with Scottish government about COVID-19 contaminated feedstock
- SA and KA to pick up discussion regarding certification transfer and permits