



Compost  
Certification Scheme



Biofertiliser  
certification scheme

# CCS & BCS Spring 2024 TAC Minutes

Wednesday 20<sup>th</sup> March 2024, Online

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## Attendees

Stephen Nortcliff (SN)	Chair
Georgia Phetmanh (GP)	REAL
Oliver Dunn (OD)	REAL
Duncan Craig (DC)	REAL
Megan Muller-Girard (MMG)	REAL Research Hub
Thomas Aspray (TA)	REAL Technical Advisor
Gregor Keenan (GK)	CCS Producers' Representative
Tom Brown (TB)	BCS Operators' Representative
Fiona Donaldson (FD)	SEPA
Kathy Nicholls (KN)	EA
Alison McKinnie (AM)	Zero Waste Scotland
Sarah Pitcher (SP)	Labs' Representative
Roy Lawford (RL)	OF&G
Rob Evans	NSF
Dave Roberts (DR)	NSF
Nick Johnn (NJ)	ACL

Start: 11:00 am

## Welcome and apologies

SN welcomed all to the meeting, noted apologies from several members, and introduced OD as REAL's new Schemes Manager for CCS and BCS, then begun a roundtable of introductions.

## Minutes and actions from the previous meeting

### Minutes

SN asked if anyone had any comments on the previous meetings' minutes which were sent in advance of the meeting. There were no comments, and the minutes were formally adopted.

## Updates from REAL

### CCS/BCS updates

#### CCS statistics

As of the 1<sup>st</sup> of March, there were 175 CCS processes, 1 fewer than the previous TAC meeting held on the 9<sup>th</sup> of November 2023. The processes were distributed as follows:

- England: 134
- Scotland: 21
- Wales: 13
- Northern Ireland: 6
- Republic of Ireland: 1

These processes were receiving a collective **4.1 million tonnes** of input materials per annum, representing a 2.5% increase since the 9<sup>th</sup> of November.

Annual compost production has also risen, with a collective output of **2 million tonnes** per annum, representing an 11% increase since the 9<sup>th</sup> of November.

#### Applicants

One new applicant in mid-November applied just after the last meeting.

#### Suspended

One producer was suspended in December 2023; their certificate was reinstated in February 2024. Another producer was initially suspended in January due to the business being sold to a third party, but the certificate has since been reinstated after transfer.

#### Withdrawals

One producer was withdrawn in January due to the business ceasing compost production.

#### New Certified Producers

No new producers have joined the scheme since the last meeting.

#### BCS Stat Updates

As of the 1<sup>st</sup> of March, there were 108 BCS processes. The processes were distributed as follows:

- England: 80
- Scotland: 13
- Wales: 8
- Northern Ireland: 7

Certified processes were receiving a collective 6.0 million tonnes of input materials per annum, representing a 6.5% increase since the 9<sup>th</sup> of November.

Annual digestate production has also risen, with an output of 5.0 million tonnes per annum, representing a 4% increase since 9<sup>th</sup> November, which can be further divided into the following categories:

- Whole Digestate: 3,224,000 tonnes
- Separated Liquor: 1,603,000 tonnes
- Separated Fibre: 243,627 tonnes

#### Applicants

One new applicant in February, an England-based AD plant.

#### Suspended

One producer was suspended in early December but reinstated in January 2024 upon completion of their site maintenance. They are producing digestate again and will re-validate but needed the certificate to dispatch under positive release as each batch is tested and passes.

#### Withdrawn

One operator was withdrawn in January, and one in February as a result of the plants ceasing operation.

#### New Certified Operators

One AD plant in England gained certification in January.

#### CCS & BCS Scheme Rules

GP provided an update on the revision of the Scheme Rules; REAL are awaiting the results of the formal review by UKAS on the CCS Scheme Rules, and any changes will be reflected in the BCS Scheme Rules. GP informed that there were some delays on our side while we discussed and agreed the associated costs and on UKAS' side due to availability of assessors. We have a meeting next week to discuss specifics and hope to publish the rules in early May, before the forums ideally. We will then hold a CBs roundtable meeting to present and discuss the changes with auditors.

#### CCS & BCS Position documents

GP also provided an update on the CCS and BCS Position on Technical Requirements documents; similarly, discussions have continued around the outstanding positions.

We will publish the new position documents alongside the new Scheme Rules. The draft BCS position on digestate screening has been discussed with Jo Chapman and with the CBs. We will be sharing our most recent thoughts with Jo this week. We have been further discussing the position on testing digestate used on a producer's own land or within a co-operative with NRW and the CBs. We have also produced new draft positions on HACCP training and testing compost for physical contaminants after a stones failure, which we will share with the TAC for comments soon.

#### Laboratory T&Cs

TA shared an update on the annual review of the laboratory terms and conditions (T&Cs), commenting that the most significant change was bringing in the opportunity for non-UKAS accredited labs to become approved. To give more choice, while keeping the rigour of the schemes, there is a limit on the amount of testing they can do. The auditor will look at their QMS in exchange for lack of UKAS

accreditation. TA is confident these checks will ensure rigour is maintained. TA commented on the creation of the first physical contaminant and stones (PC&S) analyst webinars for the labs, wherein the new laboratory T&Cs require the labs to participate in webinars regarding scheme-specific tests.

Regarding non-scheme methods, the T&Cs state that if those are withdrawn with no clear alternative, then the labs must come back to REAL and discuss further.

The final change TA mentioned was that information in the T&Cs about communication not being auditable has been moved to the main contract document that is signed between the Lab and REAL.

#### Reappointment of labs

GP announced that following last year's audit round, and recommendation from the Open University, all three labs have been reappointed under the new T&Cs. REAL discussed the labs' 2023 non-conformances and proposed corrective actions with the CBs during the annual Laboratory Approval Scheme meeting and decided to appoint all labs under the new T&Cs for 2024.

#### Appointment of new IA

GP provided an update regarding the open tender last year; SJB Quality Consulting, led by Simon Blackhurst, have been appointed as the new independent lab auditor for CCS and BCS. GP informed that the next round of audits will begin in April.

#### Database and test results

GP reported that at the beginning of the year, a problem was identified whereby emails from the labs with test reports were being blocked due to further Microsoft updates. The issue was only a problem for two of the three labs. Regardless, the CBs were instructed to accept test reports given by producers on-site. GP informed that the issue is almost fully resolved due to the labs using a new email address to bypass the block, and that the missing reports are being uploaded to the central database now. In the meantime, the test report upload process is being internally monitored.

#### Reporting templates

GP confirmed that four laboratory reporting templates have been finalised; one for each scheme with an alternative version for Scotland specific reports. These reporting templates are being trialled internally before a launch date is confirmed to the approved labs.

#### Webinars for producers/operators

TA reported that 4 webinars have been delivered. The sampling guidance and understanding PAS100 testing for CCS and the sampling guidance and understanding PAS110 for BCS; this was the first time running the BCS sampling guidance webinar.

TA added that 13 people signed up for the BCS sampling webinar, but there were not 13 attendees, explaining that it is free, so the loss is expected. Hopefully in the future we can use the MS Teams webinar function for extra features.

TA concluded by saying that there is currently a third CCS webinar in production, focusing on interpreting test results. We will move some of the information from the CCS understanding testing into that. Information on results pass rates will help to present data in such a way that may help producers understand how to avoid failures. It should be interesting.

SN reinforced that webinars are extremely helpful for providing context and help to producers who might otherwise have few people to go to with questions and concerns.

### Peat project proposal

TA explained that a Research Hub project proposal relating to the plant response test using peat as a positive control was submitted by CCS to the Hub. There are concerns about the future availability of peat, and so the scheme prepared a proposal for the Hub which wasn't previously supported (in 2023), as QP-related projects were taken forward. REAL CCS has resubmitted that project to the Hub for this round of the call for proposals, so we shall see how that develops.

SN agreed that the issue of peat availability is significant, saying mushroom growers were complaining in The Times about removal of peat. They've been given an extension, but they didn't seem to make much progress in developing alternatives, summarising, it's an area of importance.

### Research Hub Updates

MMG explained that she would give a brief update shortly on the current projects; there are five projects ongoing in various stages of work.

MMG announced the closure of the new project proposal windows on the 8<sup>th</sup> of March. Eight proposals were received across a wide variety of subject matters across the sector. MMG mentioned that a research panel including TA and GK would review the proposals and more would be announced soon.

### Completed projects

#### RBP

The project has concluded, and a report was made available last Friday, an announcement is on the way shortly and MMG has a 3-page fact sheet available to share with anyone who is interested.

#### Carbon Accounting

Ongoing for the last 9 months, this project covers the development of a methodology for carbon footprint assessment for compost products. It is planned to be published later in March. It is being discussed further at the ORG conference on the 21<sup>st</sup> of March.

### Ongoing projects

#### Measuring plastic content in compost and digestate

There is a project that focuses on plastic in compost and digestate, it's an active project involving the REAL-affiliated labs and focuses on the current mass-based method for plastics; with special attention on improving robustness and effect with an area-based method and analysis of microplastics. This project is aiming to conclude in spring 2024.

#### Risk assessment project for QP provision

This project has been held at a standstill due to a hazard analysis paper received from the EA, that called for an independent review of the hazard analysis review of this project. The Hub could fund an independent review and met with the EA earlier in March to discuss further.

#### Plant response test interpretation and comparison

This project has been ongoing for two years now and is progressing because of REAL developing a project coordinator role, a contractor who will work with the scheme-affiliated labs to deliver this interpretation and comparison. The tender for this role closed on Friday, now the tender evaluation stage to appoint this contractor can begin. A decision will be made by the end of April.

SN added that MMG had managed a webinar with producers, in aid of bringing producers into the research process. SN noted the success of the webinar and that a Research Hub application had been successfully submitted.

### QP revision updates

DC delivered an update to the TAC on the progress of the QP revisions, informing that since our last TAC meeting, there have been two QP meetings, one in November and one in January. In the November meeting, REAL proposed a new plastic limit for compost and digestate in the January meeting it was agreed that those proposals were the correct next steps. The next QP meeting is scheduled for later today (20<sup>th</sup> March), DC is confident that progress will be made, stating that the draft and interim Resources Frameworks have already been sent over.

KN requested that the draft and interim frameworks were sent over as she had been on leave during the previous meeting, and mentioned the importance of timely progress as other matters needed addressing after this work was concluded.

DC and SN agreed that the project was nearly concluded. DC approximated a two-month timeline.

KN stated that the other issues need addressing urgently and that the frameworks must be produced so as not to jeopardise the scheme.

KN mentioned difficult talks with a local authority group regarding increased food waste and the need for a clean-up of the system, stating that the issue has been fed back to Defra who need to produce shorter, more effective documents to bridge better between industry and regulators. Additionally, there was an issue with a reluctance to show contracts that was inhibiting progress. Citing the 100+ page document, KN mentioned the combining of organic and inorganic processing into the same document, creating a much slower, more challenging consultation, but sympathised that it is difficult for Defra to fit EU regulation together. KN concluded by saying that the QP arrangements should stay with REAL in the organics sector, and that improving this is more agile than changing the regulations which is the primary concern.

DC added that the EFPR also intermingles organics and inorganics and might be relevant in the future.

SN agreed with KN that the issue of local authority contracts is difficult. If you look at what is coming off the trucks, although it may satisfy the contract specification it often appears to an observer to contain unsatisfactory levels of contamination, because there is little understanding of what a particular level of allowed contractual contamination actually looks like. To reduce this contamination at site is expensive. Removing the contamination is possible, but very costly and probably makes the whole recycling process non-economic.

KN described the contract problem as a duty of care issue. Suggesting a lot of processes are not allowed to reject inputs and are highly restricted by aspects of the contracts that they believe should not be present if they are to cycle materials satisfactorily. KN note that while local authorities were under a lot of pressure, the EA will get back to them and advocate for change. Concluding the discussion, it was noted that there needs to be a programme to educate the public on what cannot be placed in local authority recycling schemes; this would probably be best achieved if a 'celebrity' could be encouraged to publicly support the programme, as other forms of guidance seem relatively ineffective.

RL asked KN if they could confirm rumours that manure would be added to the digestate QP. KN responded saying the idea has been present for many years, but needs to be discussed within the EA working parties before it is clarified for farmers about how their slurry and manure is managed; but

commented that this was in the context of the government reducing support for developing this idea. KN concluded that much of the content around this topic was unresolved.

RL expressed concern that manure-based AD plants would suffer from regulating manure-derived digestate, and that this was illogical due to digestate being safer than raw slurry. KN agreed that this addition to the QP could negatively impact the scheme and the AD operators, adding that as long as they were not over-applying then could continue.

DC mentioned that REAL have a project in the background regarding collecting data from operators on slurry and manure derived digestate.

KN concluded new technologies for manure and slurry digestion may help resolve this issue.

On the topic of Local Authorities (LAs) and awareness of non-compostables contaminating feedstock, GK thanked KN for ongoing talks with LAs regarding a lack of effort to remove or screen contaminants from some LAs.

SN referenced a social marketing campaign in France, whereby the French government have revitalised their recycling policy with an aggressive leafletting campaign telling people that if their recycling and organics bins contained too many contaminants, then they would not collect their bins, and that this campaign has produced a much higher quality of compost. It was also noted however that this policy likely cost a significant amount of money.

RL added that LAs have been reluctant to invest in education. AM explained how awareness campaign spending had moved away from large radio or tv campaigns because they are only affective for approximately 6 months before people forget and need reminding again. Social media allows for more regular reminders with cheaper articles.

SN stated that most LAs were hard pressed, spending more of their budget on social care; I'm afraid that waste management doesn't come high up on their agenda. Birmingham have just gone to bi-weekly collections as a result of going bankrupt.

## Updates from the Certification Bodies

There were no significant updates or issues from the Certification Bodies.

## Updates from the Approved Laboratories

SP said the only update they had was regarding the lab report uploading issue, that had already been covered by GP in the REAL updates section.

## AOB

### Raising a NC on already resolved issues

GK raised questions and concerns over a non-conformance, under clause 13.1, that compost must meet minimum standards. A previous failure had been rectified but the auditor flagged a non-conformance in



relation to this. GK believed that if the issue has already been corrected by the end of the audit, then a non-conformance should not be raised, and this was part of the standard PAS 100 process.

SN agreed that this conclusion seems logical. RL also agreed. DR agreed in principle, but suggested the issue be resolved outside of the meeting.

### Plastic report

GP flagged that REAL published another report on plastic in compost and digestate, detailing that the paper shows a positive picture. Plastic levels in compost and digestate produced in England, Wales, and Northern Ireland were significantly lower than the requirements in PAS 100 and PAS 110. GP added that REAL are taking forward various actions on how to publicise this paper and concluded that the paper can be found in an email circulated earlier this week.

### Standard inconsistencies between scheme and non-scheme plastic contamination levels

KN expressed concern at having one standard for the QP and another lesser standard for non-certified deployed waste-derived material, and that this concern was shared by her colleague. KN agreed with GK that the use of non-scheme materials going to land is functioning as a loophole that must be closed, concluding that the Environment Agency and the organics industry cannot have any leaks regarding plastic contamination.

GK asked if there was data available for plastic levels in non-scheme products, saying that it would be very beneficial to scheme participants to gather this information.

KN responded saying that it should not be assumed that non-scheme certified product necessarily has higher plastic contamination, that the product might be non-certified for many different reasons but did mention that standard rules 4, 5 and 7 were being reviewed. KN concluded saying that stones and the inclusion of a screening tool for plastic contamination are important and need to be further pursued.

### Actions

- KN to share REAL's 2023 plastics report with QP revision T&FG
- DC to send REAL's QP revision plastic limit proposal to KN
- KN to pick up issues around plastic contamination and LA contact requirements again with Jenny at the REA
- NSF and GK to pick up discussion around past NC raised at GK's CCS audit
- REAL to discuss plans for launch of new request forms and reporting templates with all Approved Laboratories
- KN to revisit discussion around plastic limits for mobile plant permits with Mat Davis at the EA