



Compost  
Certification Scheme

Biofertiliser  
certification scheme

# CCS & BCS Winter 2023 TAC Minutes

Thursday 9th November 2023, Online

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## Attendees

Stephen Nortcliff (SN)	Chair
Georgia Phetmanh (GP)	REAL
Emma Laws (EL)	REAL
Duncan Craig (DC)	REAL
Megan Muller-Girard (MMG)	REAL Research Hub
Thomas Aspray (TA)	REAL Technical Advisor
Gregor Keenan (GK)	CCS Producers' Representative
Jo Chapman (JC)	BCS Operators' Representative
Fiona Donaldson (FD)	SEPA
Colin Millar (CM)	NIEA
Alison McKinnie (AM)	Zero Waste Scotland
Sarah Pitcher (SP)	Labs' Representative
Roy Lawford (RL)	OF&G
Sophie Arguile (SA)	NSF
Dave Roberts (DR)	NSF
Nick Johnn (NJ)	ACL

Start: 11:00 am

## Welcome and Apologies

SN welcomed all to the meeting and introduced DC as REAL's new Policy Manager, then began a roundtable of introductions.

SN gave apologies from Kathy Nicholls who has gone part-time and no longer works Thursdays, suggesting that this be taken into account for arranging the meetings next year.

## 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 adopted.

### Actions

*REAL to confirm to AM whether we would like AM to take action with GK's contamination video with Scotland Excel or whether we are happy for AM and GK to work together on this separately.*

GP explained that REAL have been considering this since the last TAC and thinking how to get involved because REAL want to support this initiative but have not yet taken a decision on how or when. GP added that if AM feels action is needed now, REAL are happy for her to go ahead and contact Scotland Excel with GK, but otherwise REAL will come back to her as soon as possible for discussion.

AM commented that she and GK will begin doing this now and may involve FD if needed.

**ACTION: AM to take forward action with GK and potentially FD, engaging with Scotland Excel and sharing GK's video**

**ACTION: REAL to come back to AM when decisions have been taken about how to support the initiative in Scotland**

*REAL to consider communicating to scheme participants that they can't allow third parties to make claims or use the conformity mark if supplying their compost to them.*

*REAL to consider reaching out to retailers/third party companies making claims of certification or using the conformity mark following publication of the new CCS Scheme Rules, to request they remove claims/marks.*

GP explained REAL agrees these are good suggestions and will take forward the first action when the revised rules are circulated, drawing attention to these changes. REAL are waiting for UKAS to carry out the formal review of the rules before they're finalised and issued. REAL will look to take forward the second action when or if these companies are brought to our attention.

SN commented that we should all keep our eyes open for where the mark is being used incorrectly. He had seen it being displayed wrongly himself.

**ACTION: REAL to take forward actions around claims of use of the CCS conformity mark when rules have been published**

*JC to send summary of screening issue to GP to consider including in or with the minutes.*

*JC to feedback to operator that the issue has been discussed and agreed, commenting on storage aspect.*

JC summarised that both the above had been actioned; the summary was shared with the TAC and feedback given to the operator immediately after the meeting.

*REAL to circulate draft position on the screening issue to the TAC for final comments.*

GP confirmed that this had been actioned and only a few comments had been received, which have now been addressed. Further feedback was then sought from JC who suggested the rationale for the position be included for operators' benefit. REAL have drafted this in and are currently discussing draft changes with the CBs. The position will later be sent to JC for final comments before finalising it.

*TAC to share final version of WRAP 2013 RBP review report with TA.*

TA explained that no one has been able to find this; he has contacted WRAP, but we should leave this action as ongoing.

**ACTION: TAC to share final version of WRAP 2013 RBP review report with TA (ongoing)**

## Scheme Updates

### Scheme Numbers

EL explained that as of 31<sup>st</sup> October, there were 177 certified processes on CCS; 136 in England, 21 in Scotland, 13 in Wales, 6 in Northern Ireland, and 1 in the Republic of Ireland. Collectively, these are taking in ~4.0 MT per annum of inputs and producing ~1.8 MT per annum of quality compost.

On BCS, there were 108 certified processes, 80 in England, 13 in Scotland, 8 in Wales, and 7 in Northern Ireland. These are taking in ~5.6 MT of inputs and producing ~4.8 MT of certified digestate.

CM asked who the operator in the Republic of Ireland was, and why they were certified.

EL answered that she could not recall off the site name, but they had achieved certification as they are very close to the border of NI and are supplying to NI. GP added that we can confirm after the call.

**ACTION: REAL to send NIEA the details (name, PR number, and address) for the site certified in the Republic of Ireland**

EL then detailed how many applicants, suspensions, and withdrawals there had been since the beginning of January 2023. On CCS, there had been 4 applicants, 2 suspensions, which both have now been reinstated, and 6 withdrawals. On BCS, there had been 6 applicants, 2 suspensions, one of which has been reinstated, and 3 withdrawals.

AM asked if any of these suspensions were in Scotland. EL responded that she didn't have this information to hand, but we can get back to her.

**ACTION: REAL to confirm to AM whether one of the suspended sites was based in Scotland**

### Any Questions on the Summary Paper

GP invited the TAC to share any comments or questions they have on the summary paper, which was shared in advance of the meeting.

JC commented that the paper was very useful, there seems to be a lot in progress, and she awaits further update.

FD queried when the plastics contamination paper mentioned would be published as the summary paper just said “soon”.

DC responded that REAL had hoped to publish it in advance of the TAC meeting, but had some changes and additions to make, so end of the year is the new aim.

AM added that there will be a paper on contamination in Ireland being shared soon, and she can share this with the TAC.

## Update on the Research Hub

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

### RBP Test Improvements and Alternatives

MMG detailed that this project to explore any potential improvements or alternatives to the RBP test, given operational challenges presented by the test, was scheduled to be completed this summer. However, there have been several delays from the contractor’s end, it’s been made clear recently that there are larger issues with the contractor at play that may explain these delays.

The Hub is now working with Aqua Enviro to complete the project by the end of the month and MMG added that she has a meeting this afternoon to discuss outstanding actions, so would be leaving the call after the lunch break for this.

### Carbon Accounting for Compost and Digestate

MMG delivered the update that AECOM had been contracted for this project.

The project aims to look into a methodology of accounting for the carbon emissions associated with the life cycle of compost and digestate. The Hub will be running a workshop series for operators on this and there will also be a written report which MMG explained is currently in draft form for review and should be finished by the end of the year.

SN commented that his local authority had recently produced a document on GHG management, and that it would perhaps be something LAs could promote within their own programmes on GHG management.

JC asked what people can expect from the upcoming webinars. MMG responded that it will be a series of two webinars, the first of which will be an overview of the GHG protocol itself, and the second is to talk operators through a calculation. They have the report in draft form, but these webinars should be useful to AECOM in terms of hearing from operators on considerations that need to be added e.g., other processing steps. JC commented that this will be really useful, but it needs to be shared with the right people – the compliance people who usually receive REAL’s emails may not be the right contact.

TA added that he has seen in LA contracts questions being asked on reducing emissions; it is being seen in other aspects.

## Plastic Contamination Method Assessment

MMG updated that Solidsense has been appointed for this work, and that two of the four milestones for this work have been delivered. At each milestone, Solidsense and the REAL Research Hub Project Management Team (PMT) have convened for a review meeting to discuss progress, discuss any questions or issues, and provide feedback. The PMT have been satisfied with the work thus far and the project already seems it may address potential practical improvements to the current test method for plastics; the project is due to be finished in Spring 2024.

SN asked if webinars will be held for this project also, or some other way to share outcomes for operators, as he feels the webinars for carbon accounting are a positive addition.

MMG answered that the GHG is the first time that the Hub is doing webinars, but feedback from the survey has suggested support from scheme participants also, so the Hub are open to doing similar with other projects. With this project, it is a question of who the audience would be, i.e., labs or operators.

FD commented that from the PMT's perspective, the project is going really well, it has given us a lot to think about, but perhaps that is a good thing.

## Plant Response Test Project

MMG reminded the TAC that this project would involve running a series of spring barley tests alongside the tomato plant response tests to aid interpretation of results. This project was proposed by the PRT TWG and has been pending for a couple of years as the Hub had trouble finding a contractor. The Hub is therefore now taking a different approach to work with the labs to deliver the work, and report results to a project manager who will liaise between the labs and REAL to collate data for later analysis.

MMG explained that she had contacted the labs a while ago now to mention sending over a contract, this has been delayed as they have been trying to revise the standard Hub T&Cs alongside this, and it has taken longer than expected, but hoping to move forward and send over an agreement soon.

## Risk Assessment Updates for QPs

MMG explained that in July the Research Panel selected Research Proposal 5 Phase 1 (Risk assessments updates for compost and digestate to inform the CQP and ADQP revision) as the main priority to be taken forward for Research Hub funding. It was also decided that if there was no alternative funding available for RPP 5 Phase 2 (Risk assessment for digestate use in horticulture and soft landscapes), the Research Hub could also fund this work, as a second phase of the primary Risk Assessment.

The Project Brief specified that the Risk Assessment Project (specifically Phase 1) would build upon the QP Task and Finish Group's Hazard Analysis, which contains 'rapidly reviewed hazards and information from relevant reports, considered QP-, PAS- and certification scheme-related mitigation or control measures' and identifies where further risk assessment is needed. However, as of now, this document has not been made available. Therefore, the Hub has been unable to move forward with either project. Initially we postponed putting the project out to tender from August to October. We're now in touch with the Research Panel to discuss how to move forward, which could involve postponing the project further, selecting another project to take forward in 2024, or potentially some other options

JC queried what has caused the delay and how this will impact on the QP process as a whole. MMG responded that she was not entirely sure. In her understanding the document that the Hub is waiting for should have come out of the QP review process.

SN added that in answer to JC's query, the Hub needs the work from the QP Task and Finish group to be able to move forward but has not yet been given this. It is an unusual procedure, but one the Hub hope they could contribute to, but it is a complex relationship between this and the T&F, it is hard to manage.

JC commented that it seems indicative of a separate issue with QP revision progress, but this presumably will be covered in the QP update of this meeting.

### Upcoming Developments

MMG informed that the Research Hub website will be updated during this month, possibly as soon as tomorrow, the Hub have been working on this for some time but were delayed by the CCS and BCS site updates. This will finally be completed.

MMG also reminded the TAC that the next call for proposals will open in January, so there is time to consider any research ideas before then.

MMG asked the TAC if anyone had further comments or questions on the updates given. SN reiterated that the webinars for the GHG project may be key in helping producers get more involved in generating research ideas, as well as making sure they see the outcomes and can see how they relate to them.

MMG agreed, adding that finding the most useful format is something the Hub will be considering.

### Update on the Quality Protocols

DC delivered an update to the group on the progress of the QP revisions; he shared that the last Task and Finish Group (T&FG) meeting was held in July, and the last working group meeting was in September to discuss manure and slurry derived digestate, and the EA's desire to establish EoW criteria for this type of digestate. The EA have set out their thinking behind this development and how the industry would go about creating and implementing these criteria. The group are continuing to discuss the best way forward. There have been a number of developments on REAL's side, focussing on two proposals to be presented at the next T&F group meeting later this month.

### Manure and Slurry Derived Digestate

DC explained that REAL are thinking on the best way forward as there is a lack of data on the production and use of manure and slurry derived digestate. As such, REAL are proposing to the EA that some time is taken to collect this data from operators to see how they are performing.

RL queried why this position is being withdrawn at all, it will just encourage people to spread manure without putting it through the digester. DC responded that it was withdrawn due to the legality of the position being question, and the REAL are focussing on trying to find a way forward given EA decisions.

RL asked if anything will be done about raw manures. EL answered that this is not something we've been made aware of, but it is out of scope for CCS and BCS anyway.

FD commented that RPS252 was withdrawn in March last year, and this is potentially linked to the Farming Rules for Water. FD added that SEPA aim to maintain further processing of raw manures as it is safer. SEPA will not be changing their position on manure derived digestate.

CM added that NIEA will be less enthusiastic about the removal of controls, though generally not just for manures, due to recent contamination issues with Lough Neagh.



## Plastics Limits

DC informed that unlike manure and slurry derived digestate, there are well established plastics limits for both certified compost and digestate. It is seemingly the case that industry has accepted there will be a tightening of limits with the new Resources Frameworks to at least the SEPA limits.

REAL is planning to publish our analysis shortly.

## Risk Assessment

DC detailed that the EA's initial plan was to produce a final framework by the end of 2023, after discussions with the Agency, they agreed to produce an interim framework on the basis that industry would look to complete the risk assessment work in the meantime. As MMG mentioned earlier, this is being taken forward as a Hub project, but progress has been delayed due to external factors.

DC added that the next T&FG meeting will be later in November and the final one this year will be the week before Christmas.

## Update from the Certification Bodies

RL reported that OF&G had received no complaints since the last TAC, and there had been one BCS withdrawal in England.

SA updated that the complaint discussed at the last TAC has now been closed out and there has been no further complaint. There have been a few withdrawals over the last few months of sites not wanting to renew or no longer operating.

NJ informed that there have been no complaints, but one suspension on BCS and one on CCS.

## Update from the Approved Laboratories

SP explained that there are no major changes to report; the labs are getting stuff ready for the new reporting templates and forms, and the first PC&S webinar is being held tomorrow which is exciting.

## Update from the CCS Producers' Representative

GK reported that producers raised feedstock contamination again as an issue. Producers are asking for more engagement between government and LAs, with the QPs likely to tighten the plastic limits, it will be hard to meet this with the conditions that LAs are putting in their tenders e.g., that compost producers must accept 5% contamination in incoming loads.

FD queried if the limits on permits that the EA have put in place has made a difference?

GK replied that not all compost sites have these permits in place yet, so some are at an advantage. Theoretically, if everyone was sticking with the 1% on permits, it would be impossible for LAs to put anything else in tenders.

FD commented that she is asking as SEPA are considering something similar in Scotland, but she will discuss with GK offline.

**ACTION: FD and GK to discuss the potential complications for producers with the revised plastic limits specified in the permits (e.g., not a level playing field)**

GK added that he is unsure if this is the best mechanism; his view is that everyone needs to be pushed towards certification, which would not leave opportunity for people taking worse quality material and putting it out under deployment.

SN suggested that as Kathy Nicholls is not in the meeting, this be further considered and potentially discussed with her.

**ACTION: REAL to consider following up with the EA about the permits and feedstock contamination issue with GK and FD**

GK moved on to raise another issue discussed; an operator had received a failure for stones, so requested a retest from the lab on stones only. The lab reported back results on PCs and stones, in this case it was fine, but what would happen if the operator had a failure on e.g., plastics in their re-test? Do they trust the re-test or the original?

SN commented that this is an interesting issue, and queried if the lab had any alternative to reporting it how they did. GP responded that there is a slight discrepancy between the labs identified by this issue. One lab would report stones only, but the others would report PC&S as a whole. REAL's view is that as the method must be conducted as a whole, it doesn't make sense to report stones only.

GK asked whether the lab reporting stones only ignores everything that isn't a stone? In his view it should be all PC&S reported and if you get a failure on the re-test, it is lucky that it was caught at the analysis stage. GP informed that she would contact the lab in question to find out.

SP added that from NRM's point of view, the method is PC&S, so they are following that. There will always be an element of change and risk on a re-test as it's a different sub sample, but you need more info on the sampling and what's been done in between.

GK shared the view that it makes sense for total PCs to be reported with stones, but we need an explanation or justification for producers. TA suggested that corrective actions in the event of a stones failure may also negatively impact the other PC parameters.

**ACTION: REAL to ask the lab currently reporting stones separately what they do with the other physical contaminants**

**ACTION: REAL to consider communicating to all labs, CBs, and producers the agreed scheme position on stones being reported with all PCs and not separately following a stones failure**

## Update from the BCS Operators' Representative

JC informed that there was the usual small group at the meeting, the new chair Jane Hall has done a couple of meetings now, and it is positive to see a relationship being built between the schemes and CIWM. There was discussion as to why operators had not responded to a request for engagement from APHA, and alternative ways of encouraging engagement on that. There was a 'Research Hub ideas' session with a few ideas coming through that. There was a lot of focus on QP-related issues; operators were asked for their views on plastics and the feedback given being that generally people are expecting



a move to the SEPA limit and are preparing for this. There was also discussion around separated fibre and how there may be issues with lowering plastic there.

We talked a lot about manure derived digestate, having known from the beginning of the QP revision that manures and slurries would be included for consideration. Operators hoped for some reinstatement of the RPS, but it seems there is going to be some kind of EoW provision. It was again highlighted that the relevant operators are not plugged into the process, and have they been contacted given they are not on BCS's mailing list. Operators raised concerns that this change would mean more raw manure going straight to land, and if BCS has the capacity to manage this number of operators.

Finally, there was feedback and discussion around the screening issue raised at the last TAC; feedback was given to the forum and operators raised similar points to those I had raised previously, but there were useful learning points to come out of this on how complex technical issues can be presented to the TAC best to allow for detailed discussion.

## AOB

### AfOR Guidance

GP explained that REAL are going through the process of updating various scheme documents and putting them into our branded templates as part of ISO certification-related work and have been considering what to do with several documents which currently sit on the 'Guidance' page of the CCS website. GP asked the group if they consider whether the former AfOR guidance documents are valuable for certification purposes and whether they should be maintained by REAL.

FD responded that she didn't find anything in them out of date but suggested that they maybe have a more natural home with REA rather than with CCS.

DR suggested that maybe REAL could add a disclaimer that they are not responsible for keeping them up to date if they do keep on the CCS website.

GK agreed that REA's website would be a good place for them, but REAL could link them on the CCS site.

**ACTION: REAL to consider comments from the TAC on AfOR guidance and confirm decision later**

### In-Person Meetings

SN mentioned that REAL are considering holding at least one TAC meeting in person next year, adding his support as he feels the in-person meetings had much broader discussion. SN asked if anyone had any issues with this.

No issues were raised during the meeting, but FD commented that REAL should make sure the TAC meetings are on Kathy Nicholls' working days next year.

## Actions

- AM to take forward action with GK and potentially FD, engaging with Scotland Excel and sharing GK's video
- REAL to come back to AM when decisions have been taken about how to support the initiative in Scotland

- REAL to take forward actions around claims of use of the CCS conformity mark when rules have been published
- TAC to share final version of WRAP 2013 RBP review report with TA (ongoing)
- REAL to send NIEA the details (name, PR number, and address) for the site certified in the Republic of Ireland
- REAL to confirm to AM whether one of the suspended sites was based in Scotland
- FD and GK to discuss the potential complications for producers with the revised plastic limits specified in the permits (e.g., not a level playing field)
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