

Biofertiliser Certification Scheme Operators' Forum

Programme for the meeting on Wednesday 22nd May 2024

Attendees

Jane Hall (JH)	Chair
Georgia Phetmanh (GP)	REAL CCS
Oliver Dunn (OD)	REAL CCS
Megan Muller-Girard (MMG)	REAL Research Hub
Duncan Andrew Craig (DAC)	REAL CCS
Jo Chapman (JC)	BCS Operators' Representative
Tom Brown (TB)	BCS Operators' Representative
David Culshaw(DAC)	Refood Widnes
Kate Flanagan (KF)	Refood Widnes
Joe Ayres (JA)	CH4
Angela Cronje (AC)	Earnside Energy

Registration

General chat and informal introductions while waiting for all attendees to join the call.

GP introduced OD as the Schemes Manager, taking up his role in March 2024. OD noted he would now be operators' primary point of contact for all things Scheme-related. GP then introduced DAC as Policy Manager, taking on his role in October 2023. DAC explained he narrowly missed the previous operators' forum, beginning just after and explained that his role included work on stakeholder engagement and involvement on policy/regulatory projects on behalf of the Schemes.

1. Welcome

GP welcomed everyone to the forum and gave a brief introduction to the purpose of the forum – that it is intended to give Scheme Participants the opportunity to raise and discuss issues for the Technical Advisory Committee to consider when overseeing the operation of BCS. AD operators can feed into the TAC via raising issues with the Producers' Representative at biannual Forum meetings.

OD introduced the meeting programme.

JH queried if operators wished to add raise any issues to be added to the agenda. None were raised.

2. Previous Meeting Minutes

All attendees accepted the previous meeting's minutes—no comments or corrections were raised.

3. Updates on the BCS

Actions from Previous Meeting Minutes

JH to draft webinar agenda (potentially including content on products not covered by QP), discuss with Anna Willetts at CIWM, and share with MMG to consider for Research Hub Webinars for universities

JH shared that she'd discussed this with CIWM and they seemed keen to participate. The question now was just to decide as a group what we the webinar to cover (e.g., would there be demand to work with CIWM to do end of waste topics). JH queried if anyone had thoughts on the subject or if it was not worth pursuing?

JC commented that the idea initially was to link up with CIWM and felt that it would still be useful, noting that there are other end-of-waste resources but they don't tend to be scheme-focused and was unsure if they're in scope with the schemes (feedstocks/input materials—for instance if sugarbeets constitute a waste material or not?)

JH stated if you manage to pin the EA down on that might be worth charging for.

JC noted that the EA always issue caveat at the bottom that they're going through a policy review and have the opportunity to change their mind. JC stated that sugarbeets were a good example and starting with feedstocks and getting the EA on board is a good idea.

JH suggested that another useful topic might be to cover the new Resources Framework when its published, adding that they were looking into webinars for September/October; and would like to know if that works out. They concluded knowing what was in-scope or not in the new RF soon would be helpful.

JC commented that the feedstock routinely comes up (twice a week) – even if out of scope for then – JH noted that end of year is a likely timeframe if getting EA folks involved and wondered about contacting Richard Fairweather (the 'new Redwin') as well as Redwin himself (wherever he's working now).

See action 1

JH also noted that Kathy Nichols would be good as the go-to person on all things biowaste and feedstocks and Anna Willetts (CIWM) was keen to talk generally about end of waste and different methods (she does more on waste to fuel).

JC commented that byproduct status material is more of an issue for input materials. Conversely, there are final products not included in scope for the QP, so we're looking at end of waste for these products.

JC queried whether the webinars to be available to anyone or limited

JH stated that CIWM would want it to be open to anybody and could be led by CIWM with guest speakers from REAL and ideally a segment on the QPs and the benefits of operating under the QPs. JH thought it would be free to members of CIWM or potentially to anyone and queried whether the group would want it to be more widely freely accessible?

JC shared she'd like it to be free to all as it might be useful for feedstock providers too

JH confirmed we don't want a situation where it's not free for our scheme but free for CIWM, when the idea initially came from the Schemes.

JH noted Anna Willets can cover legality of what is byproduct/end of waste and EA can handle fiddly (specific) bits, keeping it focused on biowaste for end of waste.

REAL and operators to send JH any further ideas for EoW webinar with CIWM

Jane noted that she had not heard any further comments and shared her email (jane@greenedgeapps.co.uk) and asked attendees to get in touch with any ideas.

See action 2

REAL to provide update on CMCS compostables labelling/design initiative at the next forum

GP reminded the group that this action related to the design for compostable liners and bags, related to the work of CMCS, a scheme owned by REAL alongside CCS/BCS. As an update, CMCS is still considering whether to introduce a new labelling/marketing design for compostable liners/bags (to make it easier for composters to identify in the feedstock) or to collaborate with BBIA (the Trade Association for the compostable packaging industry) on this work. GP explained there had been some developments from BBIA that are being considered and handed over to DAC to explain further.

DAC introduced himself as the Policy Manager for the Schemes. DAC continued from GP's updates on the design for compostable liners. On 21st March 2024, BBIA launched the liners in a honeycomb design to assist composters in rapidly identifying compostable materials from standard plastic liners. DAC explained that a prerequisite to adopt the design is certification – the industrially compostable materials must be certified with an independent certification scheme's rules and BS EN 13432, BS EN 14995 or ASTM D6400. Similarly, home compostables must be certified with an independently certification scheme's rules and certification codes AS 5810-2010, EN 17427 or NFT 51-800, or TUV Austria's OK compost home certification scheme. To be able to use the design, the user must be a BBIA member or a consumer of a BBIA member. However, the application process includes a requirement to prove that the bags meet the aforementioned prerequisite standards before the design can be printed on the liners.

DAC reiterated that discussions are ongoing with BBIA and there will hopefully be more to come soon.

JC expressed that, presumably, the update will be most relevant to people selling final material in bags and was unsure how directly applicable it will be for most AD operators, though it could become more relevant in future depending on what happens to dry digestate in the ADQP revision.

REAL to record VFAs technical issue for PAS 110 review (should VFA analysis be mandatory?)

GP shared that this item was related to a discussion held at the previous forum. This issue was recorded for the next PAS 110 review. No concrete update on when that review will take place but whenever it takes place, this issue will be looked at more closely.

EL to share operator comments on ADQP revision (manure based digestate and plastic limits) with colleagues to feed into QP revision work

GP explained that this action related to a discussion held at the previous forum on how/whether the plastic limits should change in the next QP. GP noted that Emma Laws (previous Schemes Manager) did share operator feedback with the Policy Team (DAC and Justyna Staff) and that DAC planned to give an update on the QP revision work later in the meeting.

GP to come back to JC with update on discussions around TAC-related feedback being held by REAL

GP shared that this item was related to discussions between herself, JC and Stephen Nortcliff, the chair of the TAC, considering how to ensure that operators' technical issues are given ample consideration during TAC discussions. GP explained that REAL and the TAC chair held internal discussions about how to create more space for- and improve engagement with technical discussions at the TAC (in the context of the discussion around changing the screen size). GP shared these thoughts and ideas with JC who agreed.

GP specified that one of the ideas was to hold the next TAC meeting in-person rather than online as there seems to be less engagement and depth of discussion in meetings moved online since the start of the Covid-19 pandemic. GP noted this will be trialled at the upcoming June TAC meeting and reviewed shortly after. GP shared that REAL will also consider implementing other ways to consider technical issues and would contact JC regarding this item and how this will be managed at the upcoming TAC.

REAL to record operator feedback on the issues surrounding changing screens for next review of PAS 110

GP shared that this issue was similarly recorded for the next PAS 110 review.

AC to share details with GP on historical case of screen size change and related paperwork change – AC/GP

GP noted she didn't believe she'd received follow-up details from AC but shared that REAL were able to conclude discussions around the new BCS position on this specific topic without this additional information. But GP shared she would follow up with AC after the meeting to discuss further.

Operators to further consider research project proposals relating to the need for pasteurisation steps, characterising fibre to be bagged for horticulture (not fully covered in Valorisation Report), the impact of changing screening on other digestate quality parameters, outlets for waste material removed from screens, processing options to remove plastics from sf digestates, a test method to distinguish fossil from for compostable plastics and biochar/other additives for Call for Proposals in Jan '24

MMG reminded attendees that this action was in relation to research ideas raised in the Autumn (October) Forum Meeting of last year. During this meeting, operators raised several potential research ideas to submit to the Research Hub (listed above).

MMG noted that two proposals were submitted by a BCS participant in relation to these areas of interest – one looking into whether there is a need for pasteurisation steps even where the site doesn't operate under APHA approval, one on the impact of changing screens on other quality parameters. MMG noted she'd share more about the proposals in the Hub update portion of the meeting.

GP to share further feedback with APHA on response to waste management study and consider contacting operators directly with portfolio of non-PAS 110 certified manure-fed AD plants – GP

GP reminded the group that this item was in relation to a letter from APHA. GP previously shared the letter and received comments on it during the previous BCS forum meeting but did not receive any feedback after.

GP shared the feedback provided in the previous Forum with APHA. Additionally, as suggested in the previous forum, GP also made direct contact with operators managing a portfolio of plants processing manures, providing them with the relevant information and advising them to contact APHA if they're interested. APHA later informed that they hadn't heard from any new operators but had spoken to two operators so far who had previously enrolled, and they were waiting for the green light to start sampling in early November. APHA recently updated that the project has been progressing well with further details and noting they're expecting to share some concrete results with REAL in autumn 2024.

Operators to share any comments or suggestions on APHA's reworked letter with GP for GP to share with APHA

GP shared that REAL didn't receive any further comments outside the meeting, but APHA were grateful for the feedback shared with them from the autumn 2023 forum meeting.

REAL to consider feedback from operators re APHA's involvement in the schemes/QP revisions

GP shared that REAL discussed internally whether it made sense to involve APHA in the schemes through the TAC. REAL concluded it didn't feel it appropriate for APHA to attend all meetings, but could invite them to specific meetings as relevant technical discussions arise, as has been done with other organisations in the past (e.g., LARAC).

GP also shared that REAL met with APHA reps earlier in the year to discuss some specific technical issues (in relation to the scheme rules). The discussion was very positive and REAL are considering regular liaison meetings going forward to build a relationship with them from a scheme perspective.

DAC shared from a policy and QP revision perspective, REAL is unable to decide whether to include APHA in the QP revision process as REAL are not leading the discussions but can recommend to the EA that they be involved.

DAC noted that discussions about manure-derived digestate will continue into 2025, and at this stage, we can suggest to the EA that they involve APHA in these discussions – the EA are looking for progress on this type of digestate as it has remained a challenge throughout the revision process.

DAC expressed that things had gone relatively quiet from the EA since around February of 2024 but that REAL would keep APHA's involvement in mind when these discussions begin to pick up again.

Any questions on the summary paper

GC explained that the purpose of the paper – that it contains a summary of scheme developments since last forum in order to leave more time for updates/discussions during the meeting.

JH queried if there were any questions in relation to the developments shared.

JC queried when operators could expect the updated Scheme Rules and position paper to be published.

GP stated that REAL had still been waiting for UKAS to complete formal review of CCS Scheme Rules. This is due to the fact that CCS is UKAS accredited and REAL are looking to achieve accreditation for BCS as well. Therefore, REAL are waiting for that process to conclude as any issues that arise from the CCS

rules review process may also arise for the BCS rules. GP shared she'd asked UKAS for an update but had not heard back and was hoping to resolve the issue over the next month but noted that the timeframe may depend on how significant their comments are and how long it takes to address them.

GP expressed that whenever the rules are finalised, REAL will also publish the new version of the BCS position on technical requirements and communicate transition periods.

JC asked what the ballpark timeframe is for the transition period.

GP replied that a minimum of three months will be given, but the timeframe will depend on the significance of the changes, noting that REAL will consult with CBs to determine an appropriate transition time but reiterated that 3 months would be the minimum.

4. Update on the ADQP revision

DAC explained that the Resources Framework will replace the Quality Protocols. In February, the EA produced a draft of an Interim Resources Framework for the EA-led Task and Finish Group (T&FG) to review. REAL has reviewed the draft document and have added comments and suggested edits. The next TF&G meeting will look to finalise the draft Interim Framework. DAC noted the meeting had not been scheduled but he hoped it would take place this month.

Once the Interim Resources Framework is confirmed and implemented, the TF&G plan review the Interim Framework to create the finalised Resources Framework based on the performance of the interim framework and any areas that should be amended. This is estimated to occur Summer 2025 but it's unclear how this will be impacted by recent delays.

JC queried whether the interim framework would be implemented in Summer 2025 and then subsequently developed into a final framework later. JC also asked for clarification on the rationale for rolling out the framework in this phased way (moving from interim framework to final).

DAC explained that the interim framework would transition the QP to the Resources Framework format as a first step as the QP hadn't been reviewed in quite some time. The Resources Framework format is more inclusive, therefore the EA wants to give time to see how the new framework works before introducing further changes in the second stage. DAC also noted that the final framework might include some larger changes, for instance the inclusion of manure-derived digestate.

TB asked whether operators would be consulted on the changes to the framework or if it would be issued as it stands whenever it's complete?

DAC shared that per his understanding of the initial timeline, a consultation phase was part of the planning, however due to the delays, the consultation period might not be as long as it was meant to be initially but he would not be able to confirm until next meeting with the EA.

TB queried whether the PAS 110 review will be affected by the QP revision and delays.

DAC replied that any review of PAS will rely on the implementation of the interim framework as these documents go hand in hand, but there remained a lot of uncertainty.

JC noted it seemed there was a lot still undecided, that an something was coming soon but not the final framework and there's still uncertainty about when operators will be consulted and on which bits – is this accurate?

DAC confirmed this was the case and noted that the EA has indicated there's a drive to get the framework(s) sorted but there hadn't been much communication with the EA in recent months, so a lot of hope was being placed on the next meeting to get answers to these questions, whenever it may be.

TB queried if manure-based AD would be included in the scope of the framework or too early to say?

DAC replied that it would almost certainly not be in the interim framework, but perhaps in the final framework. DAC also shared that separately, REAL had begun work on a project on manure-derived digestate to explore how other countries—specifically Germany—deal with this. The project will explore data to form some kind of standard for this type of digestate as it has not been accounted for since RPS 252 was withdrawn. While the PAS refers to cooperative agreements allowing spreading of manure, we would like more regular treatment and we are hoping to align this with the work on the Resource Framework review in summer 2025.

JC asked if DAC could give an indication of what may be coming in the interim framework.

DAC replied that in January 2024, REAL proposed sub-limits for plastics as a specific component of physical contaminants in PAS 110 (as is the case in PAS 100), with preference for the new limits to be included in the draft interim framework. When we proposed these limits, there seemed to be consensus on including lower and specified plastic limits set out in the framework and REAL hope it carries over to the published document.

JC recalled that at the previous forum, REAL raised that the sliding scale for plastic content relative to nitrogen (N) content might be subject to change. JC queried whether there was any update on this.

DAC answered that REAL still want to have that conversation. DAC said that they did not expect this to change in the interim framework but might occur in the later review, noting that it has been raised in the TF&G meetings - separating for different digestate types or to have one chosen plastic limit for all digestate types. There are pros and cons for both of these alternative approaches.

JH commented that it seemed like there was lots more work to be done on the interim framework.

JC noted that the draft updated Appendix B had been sent for consultation a while ago and queried whether the updated Appendix B might be included in the interim framework.

DAC commented that the draft included some proposed changes to the waste codes and noted that he hoped that by the next meeting, REAL might be provided the definitive list.

JC queried what the period of adjustment would be to allow operators to comply with new plastic limits and any other changes.

DAC shared that REAL proposed to the TF&G a lead time of 18-24 months with an incremental percentage limit in the middle. DAC expressed he believed there would be some amount of lead time and thought that was the right thing to do.

JH asked where the interim framework will be published.

GP believed it would be published to the government website as a static page, with the option to download the framework as an html file.

JC queried if REAL will be running any sort of webinar when the framework is published, noting that operators will likely have lots of questions or want to discuss what the new framework will mean.

JH noted this could be part of the CIWM webinar and asked whether it would be most useful to have as a training or purely informational session.

See action 3

JC stated it would be useful to have a discussion of what's changed in the new framework (e.g., what's new, what does that mean, what sort of challenges does that raise for people?)

JH commented that the issue with CIWM workshops is they need to be organised and speakers selected quite far in advance, but if the publication date is unclear, there's a risk of missing the boat. JH suggested a lead time of ~1 month from publication would be really useful to begin organising any informational sessions and allow organisers to understand the changes. JH noted that if REAL has an inside track on when it's likely to be published, it could help with planning the response.

GP commented that REAL had not yet considered this and was unsure if REA had, and wondered if this could be done jointly.

See action 4

JA then queried whether there were figures available yet in relation to the review of plastic thresholds.

DAC shared that the limits are likely to be reduced to 8% of the PAS110 PC limits, in alignment with SEPA. These 'sub-limits' have been included in the draft interim framework. DAC noted this will be based on nitrogen table and application rate determined by N-rate so the threshold won't be a specific number but will depend on N-table.

GP noted she could share SEPA's position statement with the group

TB asked if the interim framework made mention of PCs at the front end of the process.

DAC shared that this has been acknowledged in the meetings by stakeholders, including the EA. DAC expressed that the onus can't fall entirely on operators to sort out. DAC also shared that there is other ongoing discussion and acknowledgement of this issue. For instance, there is hope that the Simpler Recycling reforms will lead to cleaner feedstocks, and the LAs will get on board.

KF noted that her site takes food waste from all places. A lot of the food waste is packaged and the site does remove the packaging, but in this instance, how can contamination in raw food waste be reduced? KF further noted that hearing about a reduction in plastics to 8% of the current limit has caused her to panic slightly.

DAC commented that the reforms are still in the planning stage, with government responding to the consultation in the past few weeks. In the meantime, there is work from the EA and WRAP in particular on how to assist LAs that have feedstock contamination issues.

JC noted that the CCS Rep often discusses plastic contamination in green waste, which is determined by LA contracts and can be addressed at the LA level. However, the issue is different with AD because plants receive packaged food – it's a different challenge trying to control packaging (deliberately contaminated feedstocks) at the front end from a food waste standpoint. So in this context, it's difficult to see how the Simpler Recycling reforms will improve the issue of front-end contamination for AD.

JH shared the SEPA RPS in the chat and agreed that it's a difficult thing to address for AD as the cause of most contamination in AD feedstocks is not an issue that can be resolved on the LA level (as is the case for CCS)

5. Feedback from the last Technical advisory Committee

AC joined in the break

JC noted she had a few updates on headline technical issues and further commented that she'd attended the last full TAC and TB attended the interim meeting recently, inviting him to chip in.

JC shared that one significant update from the TAC is that Kathy Nichols (Environment Agency) is now working part time. JC noted that it had already been quite difficult to get in touch with Kathy and her time would be even further stretched now, and wondered if there was any succession plan in mind. JC noted that either way, it will be significant to biowaste operators.

JH reported that permit processing times have increased from 6 months - 1 year during COVID, to currently 18 months - 2 years. AC and JC raised concerns about long processing times and potential queue repositioning for minor issues, but JH and JC noted recent improvements in Environmental Agency communication and flexibility, including willingness to grant extensions and engage in frequent discussions. As the second update from the TAC, JC shared that the group finished off some discussions about a query about screening that was previously raised.

JC also shared that a more significant learning point from the recent TAC was that technical issues weren't given sufficient time for discussion—given technical complexities, they need greater attention than 5 mins on an agenda—so there's a need to think about how to introduce issues, provide info ahead of the meeting, etc. However, JC noted that this realisation and any steps taken are a positive outcome for future meetings to ensure technical discussions are given sufficient time and attention.

JC shared that at the TAC, discussions arose regarding the ADQP, particularly in relation to manure and slurry. JC noted these discussions around manure-based digestate remain unresolved but while it is under discussion and concerns are flagged, it keeps the issue on the agenda for operators [certified and non-certified], so we managed to succeed in that regard.

JC signposted the group to the developments paper for more information and encouraged operators to come to herself and TB with any comments/questions for the TAC.

DC shared that, in relation to research, he wondered if the definition of sharps in PAS 110 PCs could be a topic of research. DC shared that the subjective nature of the current definition had caused recent issues around failures on the 'sharps' parameter as it was unclear if sharps referred to sharp plastic fragments or some other definition of sharps in PCs. DC noted he'd discussed this with Tom Aspray during the March Webinar and Tom had encouraged him to raise the issue at the forum.

JC shared she'd recently worked with an operator who had a 'sharps' failure on a pointy piece of plastic

KF shared that she'd recently had three sites fail on sharps, with at least two being quite subjective.

JC queried if this had any relation to the existing Research Hub project on plastic limits. If not, would it need to be investigated through a separate research project or could it be raised in a different way? JC asked, for instance, if perhaps a new employee began working on this recently and had a different approach to the method—is there any info on how handovers are managed?

MMG shared that this issue was out of scope for the current Research Hub project on the plastic assessment method and that work was nearly finished for the project so it would have to be considered separately if it were taken forward as a research project.

GP replied that, in terms of mechanisms outside of the Hub to explore this issue, this could be an option. GP shared that a few test methods are owned by REAL and come under REAL's responsibility—these include PC&S method for BCS. There is not currently a revision process for the REAL-owned test methods and REAL are now responsible for keeping them up-to-date but don't want to introduce technical changes just based on internal decisions so are looking to either introduce any changes based on evidence produced through the Hub or a new mechanism. Some changes might require a Hub project to be taken forward and some might not e.g., revising the definition of sharps— do we need evidence to change the definition or other expertise - who do we need to involve?

See actions 5 and 6

On the possibility of new staff being the cause of higher reported sharps in a subjective sense, GP was uncertain. GP further noted that this was the first she'd heard about sharps as an issue in a long time and asked if operators could share any information on when the sharps failures were reported for REAL to look into further.

DC noted that the lab returned the fragment that was considered a sharp and when he saw it, he didn't feel it fell into a class where it would cause injury to people or animals. DAC again reiterated the subjective nature of the assessment and queried whether there is a mechanism for the lab to be challenged or reviewed?

JC suggested perhaps some form of appeal

KF commented that one of the failures was on a fragment that appeared to be hard plastic was in fact a piece of soft plastic.

AC noted that this issue gets a bit tricky and queried if the fragment was found in the separated or liquid fraction

KF stated that it was in whole digestate, but notes the site also has a screening step

AC shared that the PAS 100 reports always have a class for plastic, glass, and metals and then have a separate section for sharps – I thought this was always needles and things like that – are we double counting here? Sharps need a very clear definition of what it is (e.g., if needles, etc.) where there's a subjective approach

DC noted that with a limit of zero for sharps and the potential for subjectivity, it seems like operators are in a tough position.

JC shared that a similar thing occurred for one of her sites, that the sample fell below the plastic limit and failed on a sharp piece of plastic. JC tried to pick it up with lab for appeal but there was possibility to do so.

DC shared that the same occurred for him, he'd tried to pick it up with the CB and lab but there was no appeal process.

AC noted that glass and metal are both sharps in different forms and there needs to be greater clarity

JC asked GP what could be done about this issue.

GP stated that the process of revising methods will occur this year (2024). However, this issue is tricky as PAS110 has a specified definition for sharps, which the method is aligned to. GP's understanding is that it would be confusing to work across two different definitions.

See action 7

5. Policy Updates

DAC shared that the ADQP revision has comprised the majority of his policy work for this period, but there are two other key items on the policy agenda – Simpler Recycling reforms and the EU FPR:

DAC acknowledged producers may have some concerns about the implementation of Simpler Recycling in terms of the cleanliness of organic waste but is optimistic that the standardisation of collections and weekly required food waste collections will result in cleaner and more plentiful feedstocks. DAC noted that this will depend on the manner in which the reforms are rolled out, commenting that it will apply not just to houses but also flats. DAC noted that the EA and WRAP have been working on this and he will continue to stay up to date on any developments before the reforms are rolled out.

DAC noted that Defra's response to the consultation on simpler recycling was published a couple of weeks ago and there were a couple of interesting takeaways:

- Will require a minimum of three bins for collection: dry recycling, food waste and residual (garden waste an optional bin that householders can apply and pay for)
- Government will not fund LAs to provide caddy liners when collecting food waste (will be an imposed weekly food waste collection – householders will need to supply their own caddy liners)
- AD to remain preferred method of waste processing (with composting as a secondary option)
- Government will impose a minimum fortnightly residual waste collection, though they want to encourage LAs to collect more frequently (not ideal) - my response to consultation was that weekly was not a good idea to prevent organic waste to going to landfill/incineration
- Dates – 31st March 2025 for non-municipal households and 31st March 2026 for domestic households.

DAC also shared that discussions about the EU FPR have continued picking up steam, particularly whether/how the regulations will be transposed to a UK context in some capacity. The main area of focus for the CCS/BCS policy team is understanding whether/how the regulation will impact the Resources Frameworks (formerly Quality Protocols) if it is adopted in the UK, though it is currently too soon to tell. DAC commented that the pace of the adoption of the FPR will likely depend on the timing of the election as the current government is unlikely to work on this as a high priority. In the meantime, he is continuing to familiarise himself with the EU Regs and stay up to date on any developments.

Looking at how Defra will make this transition – will be a big transition for us and operators – will keep people up to date when any significant changes come in

TB queried whether DAC believed there would be a dual route for product status for compost/digestate if bringing in regs or fall under one?

DAC considered it too soon to say, noting there will be different requirements for 'fresh crop' vs other digestates. SEPA recently had a consultation on potential environmental activities that require authorisations, one of these activities was Fresh crop digestate. This is a devolved policy area so question about how the UK might adopt these EU regulations and to what extent (part adoption or full transition)

TB queried if REAL were aware of any timescales for the FPR integration

DAC was not aware of timescales, but he understood that there would be some form of consultation on the EUFPR sometime this year, but given the election cycle, it was possible this would be delayed. DAC stated he would give an update whenever Defra shares more information on this process.

KF queried if DAC was present at the recent Defra meeting regarding council collections from council areas and schools?

DAC stated he was not aware of this meeting.

JH clarified if this had to do with Simpler Recycling?

KF confirmed it did and shared that in the meeting, Defra told LAs that AD sites were full, which is not the case. In fact, many AD sites have a great deal of capacity and have now tried to communicate that to local authorities.

JH commented that the capacity of AD in the UK is not well known on both sides but the issue tends to be that its assumed AD sites have more capacity than they do. This is the first she'd heard of the miscommunication going in the opposite direction.

JH queried whether the group has any powers to communicate that the LAs have to better understand the capacity they've got in their local areas with Simpler Recycling coming in the next two years.

JC also suggested it could be useful to better understand the potential for building capacity (e.g., new plants)

JH commented that anyone seeking to build new sites won't have enough time for a permit. They ight have enough time if they're varying an existing permit but for this to be useful, sites need to know now what they'll have in 2027. Some LAs have batted it forward to 2028 asking Defra for extensions, but lots don't know what is coming and the EA currently has limited capacity to process permits. JH asked how the group could get this issue in front of Defra (e.g., via a letter or a forum) to let them know that it's a time bomb and sites will be unable to fulfil the regulatory requirements.

KF shared that her company has the capacity to process 360,000 tonnes a year through 3 sites, but currently only process about 200k tonnes of waste, which is an issue if the LAs have been told by Defra that they're full.

See action 8

DAC shared that at the Food Waste Conference in March 2024, one presentation covered capacity and seemed to indicate that there's plenty of capacity that's not currently being utilised.

JC noted she'd seen a questionnaire from the REA about AD capacity for recycling food waste

DAC suggested REAL could liaise with REA Organics on the issue of AD capacity for recycling food waste

See action 9

JH suggested that this meeting might not be the right forum for this issue today but wondered how it could be taken forward.

JC raised a final question on FPR: whether DAC had any sense of whether the regs will apply to Northern Ireland.

DAC was aware of this question and trying to determine Northern Ireland's approach to the regulations. In relation to the interim framework, and NIEA being part of the requirements, DAC assumed NI would look to attach themselves to the English route rather than the EU route – that's the sense DAC was getting.

7. Research Hub Updates

MMG recapped the scope and aims of the Research Hub, explaining that the Hub works alongside CCS and BCS to support the organics recycling sector through the production of research. MMG noted the research could focus on a particular operational/technical challenge, R&D for potential market development opportunities, providing evidence for PAS revisions, or a number of other relevant topics.

MMG then explained the Research Hub's process for selecting projects. The process is broken into roughly four phases – starting with the annual Call for Proposals in January, we invite people to submit their research ideas to the Research Hub for consideration. Then, CCS and BCS participants are invited to provide feedback on each proposal. The proposals then undergo a two-stage evaluation, conducted 'Research Panel' of professionals from across the organics recycling sector (including GK as CCS representative, regulators, an REA Organics representative, etc.) First proposals are shortlisted – during this process, the Research Panel takes industry feedback into consideration. Shortlisted proposals are developed further and then evaluated for a second time and 1-2 projects are selected for funding.

MMG shared an update regarding the project selection process for this year (2024). MMG explained that eight proposals had been submitted to the Hub during the Call for Proposals, seven of which were relevant to BCS:

- Proposal 2: Annual Survey of the Organics Recycling Industry
- Proposal 3: Do biodegradable plastics fully degrade in commercial compost and anaerobic digestion systems?
- Proposal 4: Suitability of AD outputs for use as growing media for production of insect feed/food materials. Suitability of insect farming products and by products/waste as AD feedstocks.
- Proposal 5: Appraisal of the necessity for pasteurisation in different AD processes for production of quality digestate.
- Proposal 6: Appraisal of the impact on digestate quality for digestates with a final screening step, from introduction of a smaller screen size.
- Proposal 7: End of waste case information for digestate derived products
- Proposal 8: Monitoring the quality of organic waste arriving at Composting and AD sites and fed into the process.

MMG notified attendees that the online survey to provide feedback on the proposals was had been extended to 3pm on the day of the Forum and encouraged attendees to share their views on which research projects they would prefer to be funded.

See action 10

MMG then shared project updates. MMG shared that a report for the project entitled 'Developing a carbon accounting methodology for compost and digestate under the Greenhouse Gas Protocol' had recently been published and was available for Scheme Participants to use to calculate the carbon footprint of their compost products.

MMG then shared updates about continuing work. MMG explained that the project entitled 'Plastic contamination method assessment: Evaluating current mass-based methods and possible alternative methods of assessment for plastics in compost and digestate' looked to explore methods of testing for PCs in compost (and digestate) in three ways: by exploring the efficacy and robustness of the current (mass-based) method(s) specified in PAS100 (and PAS 110), by exploring the feasibility of implementing area-based methods of assessment for plastics, and looking into the possibility of assessing for microplastics in compost. MMG shared that this project report would likely be published this summer.

MMG shared that for the project entitled 'Risk assessments updates for compost and digestate to inform Compost Quality Protocol and AD Quality Protocol revision', this project was intended to conduct an updated risk assessment of the compost and AD industries to support the revision of the CQP and ADQP. However, the EA indicated that a review of a Hazard Analysis document would also be necessary and the Research Hub is now in the process of working to appoint an independent party to carry out the Hazard Analysis review.

There were no questions.

8. Issues raised with BCS Operators' Representative

JC noted the operators' issue of sharps identified in digestate was previously raised in the meeting.

9. An opportunity to discuss other issues raised by operators

JC shared that she wished to raise a couple of lab-related items and clarified that she had not been approached to raise these but was aware they'd occurred

JC notes that there had been an issue with E. coli tests that had not been done according to operational procedures and thought that there was a pathway with the CBs to deal with this if there's an issue with particular samples.

JC shared that a second issue occurred when there were two plants from Northern Ireland and both samples had nonresponses on the RBP test because a cable had been knocked loose from the equipment that reported the results to the SD card. The lab (NRM) told the operator of the faulty equipment but caused great inconvenience to the operator, particularly as it's already difficult to get samples from NI.

AC also shared an inconsistency with the lab related to the RBP test, noting a nonresponse was flagged to the operator a week before Christmas, nearly 6 weeks after it was initially submitted for testing and only one day before the site was issued the full report. AC noted that the labs should've flagged it much sooner as they would have known about the test nonresponse 5 days after the test began. AC noted that the sample did produce gas at day 14 and eventually achieved a 'passing' result, but the lab would've known at day 5 that it was invalid and should have told the operator this. Further, once the

lab flagged the issue with the operator, they shortly closed for Christmas and the operator had to wait until the new year with very little communication from the lab.

AC commented that, particularly for the amount of money operators they pay for the tests, the length of the RBP test and the challenges that invalid results present to operators, the labs don't seem to always hold up their end of the agreement to let operators know of issues in a reasonable timeframe.

DC commented that operators are limited in terms of their options to deal with issues like these as currently there are only two BCS-approved labs.

See action 11

GP stated that REAL are currently looking to increase capacity for testing under the schemes (CCS and BCS) especially on BCS, partially driven by the potential increase in demand for testing/lab capacity if manure based-digestate are brought under the revised QP. The Schemes have been in touch with between 10-15 labs to encourage labs to apply or understand whether they have an interest in this work in future. GP noted that a few labs are now looking more closely at the test methods used under the schemes and expects an application from one lab soon for BCS, with the possibility of this lab joining the scheme as early as end of the year.

DC highlighted several challenges facing the process. He noted that the capacity of the BCS and the number of samples required for testing were significant issues. Additionally, he pointed out problems with the ambiguous 'sharp' definition, though the exact context of this term wasn't clear.

DC explained that the retest process was often delayed by the need to wait for the return of PCs before validation could occur to demonstrate continued compliance. This delay, he observed, created a lag in the overall process.

DC expressed a desire to open a discussion on potential alternative methods that could be employed to expedite the turnaround time. They suggested that increasing the number of laboratories participating in the scheme might be one way to improve processing speeds.

DC noted that the PC test, one of the quicker/more straightforward tests, seems most susceptible to delays which can create operational challenges in the event of the failure. They queried whether there was appetite for existing or future labs to offer a fast-track service for returning samples? DAC proposed this could be utilised in the event of a failure if a site is looking to revalidate asap, particularly if there was a minor failure on sharps classified as an 'anomaly' to verify the new sample and result.

DC concluded, asking what would the appropriate method be if sending multiple samples for testing? Could you send multiple samples to capture the risk of anomaly? Could you send multiple samples to show you're achieving a pass on the three most recent?

GP stated, from memory of a similar discussion with CCS, that operators could do that but would only be able to use the results for the sample sent for certification purposes. The operator couldn't choose a passing result over the failure because those pass results would not be flagged as samples sent for certification purposes. GP informed that she'd check this is the case under CCS.

See action 13

KF confirmed she agreed with this approach—that the results not used for certification could lead to an internal investigation on site rather than being used for certification.

DC commented that the whole conversation on sample return times is tricky as the process is continuous and samples are based on portion of production, and that the capacity for retaining portions of production on site given the scale of some sites is a challenge

AC queried the use of the term 'anomaly' because in terms of results, a fail is a fail – you still have to go through the whole revalidation process, a pass doesn't annul it because that's what these tests are meant to capture. AC returned to the issue of the RBP failure, noting that in this case, the site's storage became full, and the process therefore became hydraulically locked. The whole plant had to stop production because it couldn't dispatch digestate from site while it underwent the whole 6-week testing process. AC shared that these kinds of setbacks make operating an AD plant completely commercially unviable.

DC clarified the use of the word 'anomaly', agreeing that a fail is a fail and must be taken that way, However, after investigation, the site could take corrective/preventative action and take extra 3 samples during revalidation to support the investigation.

AC agreed this issue is tricky because while a site is waiting for testing, they can't do anything, and for AD they can't wait for permit to dispatch as waste (as composters might do) because AD works in a continuous process

DAC asked if this issue related to revalidation after changing a screen, and whether it could be picked up in a forum or TAC.

JC stated that the issue is on the agenda. However, there would need to be a change to the standard to address the issue, as not much can be done under the current standard.

DAC commented that this issue throws a huge challenge on these large-scale plants.

KF commented that with the amount you're allowed to process, you're not getting test results back before the next batch can be sampled.

AC expressed that flexibility was needed on 'portion of production' when not defined by retention cycle. They noted that there were nuances to consider, such as the difference between reporting results as a failure and situations where dispatch was not allowed within the failure period. AC pointed out that some cases weren't failures but required retesting to circumvent the initial result. They emphasized that these weren't invalid results due to the biological nature of the test. AC explained that the current approach treated these cases as failures rather than positive releases, necessitating quick result acquisition. He concluded by advocating for a less stringent approach to resampling and retesting.

JC reiterated that it was worth asking the lab if they'd consider a commercial opportunity to provide a fast-track service.

See action 12

AC noted that NRM used to offer this on the biogas test suite but not for PAS110.

AC reiterated that the RBP issue was hugely disruptive to the site and requires a streamlined approach

KF commented that sometimes sites get results late, which is very frustrating when you're shut down for 3 months due to lab communication issues. KF noted several issues where the auditors were coming because PAS audits were close together and the site was receiving nonconformances each time due to

the labs. And given only two labs are currently approved for the scheme, operators have nowhere else to go.

GP noted all the issues raised were related to NRM and queried if anyone had issues with Eurofins.

See action 14

AC shared she only used Eurofins on the composting side, and since ATL joined Eurofins the service has improved immeasurably. AC commented that she does get quite a bit of out of spec reporting for e.coli, but within a day or two the lab told the site whether it would be a failure

KF shared that she doesn't use them for PAS110 but uses them for animal byproduct site and they inform really promptly. Even if there are issues with testing, at least the operator knows quickly.

GP noted she'd report these issues to the TAC and shared that the lab rep for the TAC works for NRM so they might be able to provide insights since the issues reported in the forum seem to be specific to NRM. GP also informed that this will be discussed with Tom Aspray.

AC flagged one final issue to raise, noting that she works with all 3 CBs, two of which did auditing three months prior to the certificate expiry date, and one did not come all together. Two CBs are very proactive at sending out forms for renewals/revalidations approximately six months before the deadline, but the other (ACL) has to be chased and reminded about audits. AC also noted she does not receive compliance notices and has to chase them for this as well and often they'll say there are no notices and issue the certificate. AC felt this should be a standardised procedure so operators know what to expect.

GP confirmed that the CBs should be more or less aligned in terms of what to expect (though they might internally work in slightly different ways). However, in terms of contacting operators for renewals, the operator should not need to chase the CB.

See action 15

10. AOBs

MMG explained that in a previous BCS Forum, JH raised the idea of webinars to promote the Research Hub to university students/faculty. The premise currently under consideration is to engage with students about the different ways young professionals can get involved in the organics recycling sector. MMG asked any producers who'd be interested in briefly presenting (~10-15 mins) to university students about their experience in the sector to please email megan@realschemes.org.uk.

See action 16

Actions

1. JH to further discuss specific EoW webinar idea with CIWM with a focus on feedstocks (and speak to the EA, potentially Richard Fairweather, Redwynn Sterry, and Kathy Nicholls), encouraging them not to charge
2. Operators to send JH by email (jane@greenedgeapps.co.uk) any further ideas for EoW webinar with CIWM

3. JH to include changes brought into the new Resources Frameworks in the draft CIWM webinar agenda
4. REAL to consider and potentially discuss with REA whether there's scope for REAL-led or joint QP revision webinars after the new Resources Frameworks have been published, to explain changes to operators etc., keeping in mind it would be useful to prepare for and hold it shortly after RF publication.
5. Operators to share specific information with REAL about sharps failures which they consider questionable
6. REAL to further investigate sharps issue on receipt of information from operators
7. REAL to come back to operators on a process for challenging results and an update on revising methods
8. Operators to raise issues in other forums around Defra potentially not being aware of current or future AD capacity for recycling food waste and fulfilling requirements of new regulations
9. REAL to liaise with REA Organics on the issue of AD capacity for recycling food waste
10. Operators to respond to Hub project feedback survey by 3pm today if they would like to submit a response
11. REAL to consider how to address issues raised by operators in relation to one of the BCS Approved Labs and discuss internally what actions can be taken in the meantime
12. REAL to consider a potential fast track process introduced by the labs for samples sent in the event of failure (with operators paying a premium)
13. GP to look back at notes from CCS forum/TAC around producers sending multiple samples for the same test to confirm if the same approach would be allowed for AD operators, then confirm to DC and KF
14. GP to look back at previous correspondence between the lab, AC, and the CB earlier in the year around RBP non-response and look to streamline the approach with similar issues brought to REAL's attention
15. REAL to discuss issues with ACL raised by operators around scheduling audits and compliance notices
16. Operators to get in touch with Meg if interested in volunteering for the Hub webinars for universities