



REA Organics Recycling Group

Progress Report No.1

April 2013

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2 Introduction

This Progress Report sets out the key activities underway that REA ORG Group is focused on. REA ORG Members are encouraged to direct any policy questions or issues to the appropriate member of the REA ORG Team and the REAL team in respect to certification activities. This is our first progress report and aims to provide a succinct summary of the main issues which the ORG are managing. The topics covered may differ from quarter to quarter depending on the importance and relevance at that time.

The ORG are keen that members provide feedback on the content and format for future editions.

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3 REA Merger with AfOR

The process of merging the REA with the Association for Organics Recycling (AfOR) was completed successfully on 1st January. Staff from the two organisations are now successfully working together.

AfOR's Managing Director Jeremy Jacobs is now the REA's Technical Director and Head of the Organics Recycling Group (ORG) at the REA. Our Compost Certification Scheme (aligned to PAS 100 and the Compost Quality Protocol) and compostable packaging and plastics certification activities are now operated under the REAL umbrella, Renewable Energy Assurance Limited a wholly owned subsidiary of the REA.

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AfOR's training programmes will continue as part of the REA's programme of training courses for members and non-members.

The Organics Recycling Group will continue their services to members as before, assisting members with enquiries concerning quality standards for compost and digestate; the collection, treatment and use of biodegradable resources; permitting and planning; compostable packaging and plastics issues schemes; and any other subject relating to the treatment of biodegradable resources.

The inaugural meeting of the Organics Recycling Sector Group was held on 31st January 2013 and objectives of the group are written below:

3.1 Objectives

To objective of the group is to promote the sustainable management of biodegradable resources, covering both aerobic and anaerobic technologies through:

- Informing and disseminating relevant information
- Supporting members with technical advice
- Creating and maintaining policy incentives
- Encouraging proportionate sector regulation
- Promoting and developing the PAS 100 quality compost certification scheme
- Stimulating a healthy and open culture for debate
- Encourage good working practice within the industry

3.2 Communication channels and events

- Fortnightly e-news
- Website
- Quarterly journal
- Bespoke events
- Workshops
- Study tours
- Annual Conference and Exhibition
- Interface with industry and regulators

3.3 ORG Board

The ORG Board is currently made up of the old AfOR Board, with governance as per REA Terms of Reference, and re-elections in 12 months. It meets quarterly with the Chair sitting on the main REA board.

Members:

- Alexander Maddan, Agrivert - **Chairman**
- Mike Orr, Teg Environmental - Vice Chair
- Charlie Trousdell, Countrystyle Group
- Ed Bastow, Material Change

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- Jim Frederickson, Open University
- Bill Griffiths, Viridor
- Dr Phillippa Yates, Independent Consultant

3.4 ORG technical activity – principal areas

- Regulatory meetings, EA & AHVLA
- Government / quangos
- Health & Safety
- ORG meetings
- Industry
- Europe

4 Certification activities under Renewable Energy Assurance Limited

4.1 Compost Certification Scheme key activities in 2012

- PAS 100 and HACCP training
- Inter-laboratory trial (see <http://www.organics-recycling.org.uk/laboratories>)
- Labs joined the VET QAS (proficiency scheme for *E. coli* & *Salmonella*)
- Independent sampling
- Improvement of complaint procedures and liaison with the Agency
- Stability test improvement
- Stability test review proposal

4.2 Compost Certification Scheme goals for 2013

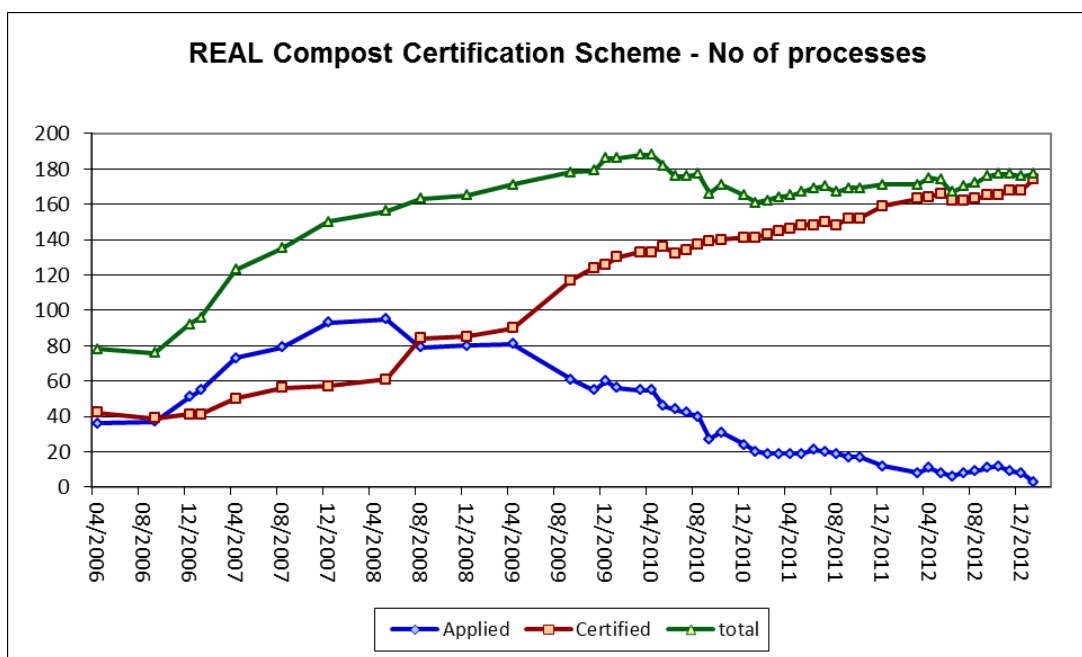
- Development of a database to hold composts and digestates quality data – labs to upload test results directly on database
- Improve labs' performance in terms of repeatability & reproducibility
- Exploring & implementing, where possible, proficiency schemes for parameters other than *E.coli* & *Salmonella*
- Plant response test performance improvement
- Improvement or replacement of the PAS 100 stability test subject to funding availability
- Training of certification bodies
- PAS 100 & HACCP training workshops – see <http://www.organics-recycling.org.uk/events>
- ORG to visit PAS 100 composting sites to understand practical issues and challenges faced by operators
- Increased promotion of PAS 100 composters
- Setting a Working Group of composting operators to ensure any newly developed or revised Scheme templates are workable.

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4.3 Compost Certification Scheme figures

Please see below the latest update (March 2013) on the number of composting processes certified and working towards initial certification and a chart showing the Scheme growth from April 2006 up to March 2013.

Applied for 1 st Certification		Renewal phase		Total applied & renewals	
No processes	Input tpa	No processes	Input tpa	No processes	Input tpa
7	115,000	174	3,447,992	181	3,562,992



4.4 Proficiency scheme for laboratories

REAL arranged for all labs to join the already established VET QAS proficiency scheme for *E.coli* and *Salmonella* (<http://vla.defra.gov.uk/eqa/PTessential-info-using.htm#who>). This scheme has been developed by the VLA for laboratories carrying out on-going testing of compost and digestate to check compliance with the animal by-products regulations. However it has now be extended to include composts tested for PAS 100 compliance. Under this proficiency scheme the VLA will send 10 samples to the labs on a quarterly basis. The PAS 100 laboratories have already participated to the November 2012 and February 2013 distributions. REAL has been set by the VLA as a 'viewer' and, as such, can monitor the proficiency scheme results.

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4.5 Stability test

With regard to the PAS 100 stability test (WRAP ORG0020 method), REA, in consultation with WRAP and the approved labs, made a few minor changes to the method instructions and sent to all labs the revised version. However, REAL believes the method needs more substantial changes and has requested WRAP and the EA financial assistance for a more substantial revision of the test method. The revision may be undertaken this financial year, subject to funding availability.

4.6 Independent sampling

According to the Certification Scheme Rules a certain percentage of certified compost producers, currently around 15%, are annually selected by REAL to be subjected to independent sampling visits.

REAL has appointed two organisations (Walker Resource Management and Agrology House) that provide independent sampling services on its behalf. The services have recently gone through two major changes in the approach adopted and we are now happy that new approach is robust. The main changes concerned:

1. Selection process:
 - 10% are selected on a random basis, and
 - 5% are selected from amongst processes that have had previous compost quality non-compliances.
2. We have shortened the notice period to 'the afternoon before' the visit;
3. Samples are now taken from any material awaiting dispatch and not necessarily within the week after the minimum compost duration has been completed; and
4. Samples are normally only tested for few of the parameters listed in PAS100, focussing the costs of testing on aspects of compost quality that are of most concern.

In order to find out how the Independent Sampling Scheme works in detail, please visit ORG's web site at: <http://www.organics-recycling.org.uk/page.php?article=1794&name=Introduction+of+independent+sampling>.

Overview 2012/2013

Under the independent sampling scheme, we have selected 24 compost producers on the Compost Certification Scheme to be visited between June 2012 and June 2013. So far, the independent samplers have visited 18 operators. Independent sample results are evaluated by the REAL in conjunction with the certification bodies.

4.7 Industrially Compostable Packaging and Plastics; certification partnership service with DIN Certco

The EN 13432 scheme provides a means for manufacturers to demonstrate to their customers and the general public that their products have been independently recognised as meeting the European standard for compostability. We continue to

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receive enquiries for this service from across the UK and beyond. We believe that this scheme will continue to expand for the foreseeable future.

4.8 Home Compostable Packaging and Plastics; certification partnership service with Vinçotte (Belgium)

The Vinçotte 'OK compost Home' certification scheme enables manufacturers to demonstrate that their products will breakdown under conditions that might reasonably be expected to exist in either a garden or allotment composting scenario. Whilst this scheme is based on the EN 13432 standard, it allows a longer time frame and lower temperature when samples are laboratory tested, reflecting the conditions that can reasonably be expected in a home composting environment.

This scheme has not proven to be as popular as the EN13432 scheme, however there is continued interest from manufacturers who want to market their products as home- and industrially-compostable.

4.9 Biobased products: certification partnership service with DIN Certco

To increase our range of services to members and promote the use of sustainable materials, REAL is currently renegotiating its contract with DIN Certco. The new contract will allow us, in partnership with DIN Certco, to offer the certification of compostable products under the EN13432 scheme and the certification of biobased materials and products. There is not currently a European standard for the certification of biobased items, however we believe that the DIN Certco certification scheme offers a way forward and builds on our excellent trading relationship with this certification body.

Biobased materials and products can be defined as items that contain a percentage of biobased components. These materials could potentially include oil based plastics containing biopolymers or biobased fillers. Biobased certification includes declaration of the percentage of non-fossil based carbon contained in the item.

Non-fossil carbon content is generally established by measuring the ratio of two carbon isotopes, Carbon 12 and Carbon 14. Most living organisms absorb both isotopes equally throughout their lives; on death the amount of Carbon 14 will start to decrease whereas the amount of Carbon 12 will remain stable.

It must be understood that whilst a product might be biobased this does not mean that it will be compostable and certification under either the compostable packaging/plastics or biobased schemes are not mutually exclusive.

5 Regulatory issues

5.1 EA/ORG meetings

The ORG has now established regular quarterly meetings with the Environment Agency to work proactively on sector issues.

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Two levels of meetings have been established, one where ORG staff engage with the EA operational staff and address current issues which are of concern. The second meeting is held between a number of members of the ORG steering group including the Chairman Alexander Maddan and higher level EA staff including Mat Crocker, Head of Illegals and Waste and Viv Dennis Senior Advisor on Biowaste.

The next meeting of ORG with the EA will be **on 24th May 2013**. If you have any regulatory issue that you wish to discuss with us prior to that meeting, please contact Jeremy (07787856384, jeremy@r-e-a.net).

5.2 ORG meetings with AH and Defra regarding new ABP regs

The ORG met with Defra's Animal By-Products team and the Animal Health on 28th March.

Amongst other issues, the implications for the AD sector of new Commission Regulation (EU) No 294/2013 of 14 March 2013, coming in force on 6th April and amending Regulation (EU) No 142/2011, were discussed (see full text of the new regs [HERE](#)). The new regulation clarifies that biogas plants 'lead to the generation of both, solid or liquid fractions' and that ABP controls apply to the disposal of both fractions. This has implications for AD facilities that are already discharging, or wish to discharge, liquid fractions into sewers although there is currently little clarity on the implications.

Defra agreed with ORG to provide clarity as soon as possible on the implications of the amending regulation for the industry and to work with the ORG on guidance for members on the implementation and enforcement of the new regs. ORG will keep its members informed and consult them when appropriate. For further information on this please contact Kiara@r-e-a.net

5.3 ORG meets Defra and NAWDO regarding contamination issues

On 19th April the ORG team met with Defra's biowaste team and the National Association of Disposal Officers (NAWDO) to discuss what the implications for local authorities would be if Defra was to decide that only feedstocks sent for PAS 100 composting and PAS 110 AD counts towards recycling.

Issues relating to levels of physical contamination of green and food wastes and potential solutions to tackle such issues were also discussed.

The ORG raised the following issues:

1. *Implications for small scale composters*

We expressed our concern about the implications for small on-farm and community composters that may not be able to afford PAS 100 certification. We pointed out that the number of composters processing less than 6,000 tonnes per annum registered on our Compost Certification Scheme has decreased over the past year, even despite the fact that we reduced the fees for this category of composters. The figures show that the decrease in uptake is mainly related to those producers composting less than 3,000 tonnes per annum; this in part is due

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to the change in regulation whereby smaller producers who used to be exempt from Environmental Permitting (or Waste Management Licencing in Scotland) were forced to become permitted. Many decided that the cost of this was prohibitive so decided to stop composting.

2. *Accurate reporting of rejects from biodegradable wastes delivered for composting or anaerobic digestion*

We highlighted that local authorities should only be able to claim as recycled the input materials that are 'capable' to be turned into quality compost and digestate. Local authorities' recycled tonnages should not include rejects that arise during inspection of delivered biodegradable wastes and during the treatment process. These should be reported accurately on the Waste Data Flow and should not only comprise of 'gate' rejects (front end rejects), but also of any other rejects that have been removed at any stage of the process (e.g. material rejected during any pre- or post-treatment step and sent for disposal, or any process output sent for disposal).

3. *Recycled tonnages claimed by LAs that 'have moved to PAS 100'*

In some cases, only a small proportion of the material that is claimed 'recycled' by the LAs is turned into quality products. Currently there is no obligation for PAS 100 composters to certify to PAS 100 all compost grades that their process produces. As a result, there are currently a number of PAS 100 certified operators who are taking considerable volumes of input materials (likely to be claimed as recycled by the LAs) but are only turning 9 – 20% of these inputs into PAS 100 products. The reasons behind this may be:

- Cost (the more products they certify, the higher the certification fees and the cost of testing);
- Feedstocks contain excessive levels of physical contaminants, so these sites can only produce a small amount of product to PAS 100;
- Some farmers already have standard permits and deployments in place to spread 'waste' compost so do not require PAS 100 compost.

The ORG will continue to engage with Defra and the National Association of Waste Disposal Officers on the above issues and will keep our members informed.

If you need any clarification on the above, please contact Kiara (07717294793, Kiara@r-e-a.net).

5.4 **Bioaerosols work update**

As a result of further research developments, the Environment Agency intends to review methods used for point source and ambient monitoring of bioaerosols at biowaste facilities. A Technical Guidance Note (TGN), M9 – "Monitoring Bioaerosols from Biowaste Facilities" will be produced later this year. The TGN is one of a series of notes providing guidance on monitoring to regulators and process operators and M9 will be aimed specifically at those with interests in Bioaerosol monitoring. The aim

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of the TGN will be to provide guidance on both stack and ambient Bioaerosol monitoring of the following Bioaerosol components:

- The thermo tolerant fungus *Aspergillus fumigatus*;
- Gram Negative bacteria;
- Total mesophilic bacteria

It will be produced in collaboration with the ORG and it will combine and replace all other methods and approaches to monitoring bioaerosols from biowaste facilities.

5.5 Biofilter work update

The Environment Agency and the Department for Environment, Food and Rural Affairs (Defra) require a critical scientific review on the effectiveness of biofilters at odour and bioaerosol removal from composting facilities.

This report provides a critical review of available evidence as to how effectively the various categories and configurations of biofilter reduce bioaerosol and odour emissions from composting facilities. The review considers what operating parameters impact on biofilter performance, and hence what design, conditions and maintenance schedules need to be defined and adhered to in order to provide assurance that a given biofilter continues to perform adequately.

The full report can be found at: <https://brand.environment-agency.gov.uk/mb/CqIH0J>

5.6 Leaf litter trials

The ORG has been co-ordinating on behalf trials with compost operators and local authorities to provide evidence which will assist the EA in deciding on the most appropriate treatment for seasonal leaf sweepings and revisit their current precautionary position. Due to the potential for contamination the EA's current guidance is that dedicated street cleansing collections of untreated leaf litter should not be used as a feedstock for composting or used as a feedstock to produce quality compost.'(see:

http://www.wastedataflow.org/documents/guidancenotes/Specific/GN19c_Leaf_Litter_Statement_England.pdf).

The ORG was keen to be closely involved in trials in order that we are able to collate evidence to demonstrate that composting leaf litter in conjunction with green waste or green and food wastes does not pose an unacceptable risk in respect to use of the resultant output, when it is applied to land as a soil amendment.

The trials started last autumn and involved a total of **18** local authorities. **64** samples of untreated leaf litter, untreated garden wastes and composted leaf litter & garden wastes were tested for **52** determinants, including:

- potentially toxic elements,
- physical contaminants,
- nutrients and
- Total Petroleum Hydrocarbons (TPH):

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- Petrol Range Organics (PRO) C5-C10
- Diesel Range Organics (DRO) C11 – C25
- Other Range Organics (ORO) C25 – C40

The trials were carried out following a methodology developed by the EA in conjunction with REA (see the EA's methodology and REA's trial instructions here: <http://www.organics-recycling.org.uk/page.php?article=2456&name=AfOR/EA%20leaf%20litter%20trials-Instructions%20for%20participants>).

The main objectives of the trials are to:

- Use a standard suite of analysis to assess the level of contamination of leaf litter feedstock and compare these to green waste feedstock.
- Establish if leaf litter from street sweepings can be used as a feedstock to produce compost.
- Identify any way in which the preparation and recovery of this waste can be enhanced.
- Assess the risk to receiving land of compost made from leaf litter.
- Identify knowledge gaps.

All trials have now been completed. REA is currently collating all the results and associated information and is planning to hand over the complete set of data to the Agency on w/c 22/04/2013.

If you need any clarification about the trials, please contact Kiara (07717 294793, Kiara@r-e-a.net).

5.7 EQual Project

REA are working in partnership with the Environment Agency's EQual programme during the next three years. EQual is a major LIFE+ programme that will support and encourage the use of products made from waste. The output from the programme will help companies seeking to achieve end of waste status for their waste-derived products, inform a more consistent and streamlined regulatory approach, and improve end market confidence.

ORG are assisting with:

- the development of a Quality Protocol (QP) Checker web tool to help businesses to assess whether their recovered waste product is compliant with a QP, and therefore no longer classed as waste;
- designing and developing a series of field trials to establish a better understanding of the environmental performance of waste-derived products; and
- arranging and attending dissemination visits, events and activities in the EU, and exchanging best practice information for the benefit of our members

Find out more about the EQual programme in the latest [EQual Newsletter Spring 2013](#) or go to <http://www.environment-agency.gov.uk/equal>

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5.8 Process Optimisation and Emissions Monitoring (POEM) working group

A meeting on 28th Feb 2013 was the second ORG and EA liaison meeting on the topic of composting process control & on-site monitoring. The first one, last year, was brought about by publication of the Environment Agency's oxygen monitoring guidance notes (more information can be found [here](#)). We have realised that odour and process optimisation need greater attention, particularly in light of requirements presented in best available technique (BAT) guidance, which focus more closely on pollution prevention & control. In order to create a better opportunity for constructive and evidence based discussion ORG has established a Working Group, called 'Process Optimisation and Emissions Monitoring' (POEM).

This working group will meet quarterly to discuss topical issues which are adversely affecting the sector, particularly in respect to the manner in which sites are monitored and assessed by the regulator.

The WG appears to be very popular among ORG's members and we have already received lots of interesting feedback. At the moment we are working on the agenda for the first POEM meeting, which should take place in the near future. If you wish to find out more about this working group, please contact Justyna (07557 784686, Justyna@r-e-a.net).

5.9 Defra Biowaste Regulatory Forum

The first meeting of the Biowaste Regulatory Forum took place on 24th January. Terms of reference were distributed at the meeting.

The aim of the Environment Agency is to provide a forum for open discussion of the Agency's regulatory approach and any changes proposed, the impacts and risks, sector compliance and performance (and ways of improving these).

REA Biogas and ORG will attend future meetings and members should use it as a channel for comments on regulatory matters. Please pass your comments to Jeremy@r-e-a.net The next meeting will be held on 20th June.

5.10 MBT liaison meeting: SOMs End-Use Standard

There is a recognised need to provide guidance to the industry on the required quality of Separated Organic Material outputs from mixed resources (SOMs) (also known as compost like outputs – CLOs) for use in land restoration/reclamation. A lack of clarity over the required quality of SOMs (CLOs) for use in land restoration/reclamation projects has caused uncertainty and delays in recycling projects, and in the case of some companies has contributed to their demise. Moreover, and potentially more damaging, is the longer-term impact on funding as underwriters do not have enough certainty that SOMs can be beneficially recycled to land. This in-turn is jeopardising the ability of UK plc. to meet recycling/recovery targets.

ORG has been in discussion with the EA and ADAS to find a pragmatic solution to progressing the SOMs Land Restoration End Use Standard which was discussed in

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some detail last year. The industry led End-Use standard was developed drawing upon a number of existing standards and documents.

All the members of the Bio-Compost Alliance Group “are signed up to the revised [Separated Organic Materials Land Restoration End-Use Standard](#)”. The main changes agreed are

- Clarified that SOMs=CLOs
- Highlighted that all SOMs included in the End-Use standard need to be treated to ABPR standards
- Restored land cannot be used thereafter for agricultural production.
- A stability measurement has been added to the End-Use Standard; from BSI PAS100.
- Highlighted that this is an **industry led initiative**.

The ORG has encouraged the EA to recognize this document and understand that industry is signed up to it. Once the EA has agreed to this, the document will be posted on the ORG’s web site and will ensure all the relevant parties are aware of its existence.

If you wish to discuss the above issues with ORG, please contact Jeremy (07787 856384, jeremy@r-e-a.net).

5.11 Wood fines

The ORG has been in discussion with the EA seeking clarification on the composting and spreading of grade B and C wood waste fines (EWC 19-12-07). Significant volumes of this material are produced and the manner in which its subsequent use is regulated is variable across the country.

The EA will in the next few weeks be providing an update to industry on what is allowed in respect to their current regulatory position statement (RPS), and this RPS will be updated in the near future to better reflect current EA thinking on the matter. The existing position statement on the environmental regulation of wood can be found at

http://www.environment-agency.gov.uk/static/documents/Research/PS_005_Regulation_of_wood_v3.0.pdf

The ORG is in contact with the Wood Recycler’s Association (WRA) regarding this matter so that we are united in our discussions on this subject. Please contact Jeremy@r-e-a.net for any further information.

5.12 Defra’s hub and pod guidance

Defra has recently released guidance on the requirements applying to ‘hub and pod’ anaerobic digestion.

In conventional plants which treat animal by-products (ABPs), pasteurisation and anaerobic digestion take place on one site approved by Animal Health. With 'Hub
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and Pod' anaerobic digestion the two components are on different sites. The hub carries out collection and de-packaging of the feedstock as well as pasteurisation and then consigns the pasteurised material to one or more pods where the digestion component takes place.

Defra's guidance on Hub and Pod digestion clarifies the requirements that need to be met by both, the hub and the pod site.

Defra and AHVLA has worked with industry representatives including the REA's Organics Recycling Group to make the guidance as clear as possible and to ensure 'Hub and Pod' is a viable option for the AD sector. The released guidance is significantly improved respect to the original document drafted by Defra/AHVLA, however, constraints with the wording of the EU ABP regulations mean that Defra's guidance still places a significant burden on the pods (although considerably less than the original draft document placed), which may result in low uptake of 'Hub and Pod' in the AD sector.

Defra's guidance can be downloaded from here:

<http://www.defra.gov.uk/ahvla-en/disease-control/abp/compost-biogas-manure/guidance-hub-pod-anaerobic-digestion/>

5.13 Industrial Emissions Directive (IED) and BAT guidance

IED is being implemented to provide a single coherent legislative regime, encourage technological innovation to reduce environmental pollution and improve consistency across the European Community/Member States.

It will replace seven existing Directives:

- Integrated Pollution Prevention & Control
- Large Combustion Plant
- Waste Incineration
- Titanium Dioxide (3 directives)
- Solvent Emissions

Implementation

IED is implemented through the revised Environmental Permitting (England & Wales) Regulations 2010. IED extends the scope of activities creating more EPR Installations (estimated 300 current EPR waste operations will need to be varied to become installations) and imposes new requirements on some of the installations. Although permits will be still issued under EPR, there are a number of significant cross-sector and sector specific impacts presented by IED:

- Permit associated charges are very likely to increase. For example one of the additional costs of the IED permit is to cover the assessment of a "baseline report", which will be submitted as part of the application.
- The publication of BAT conclusions will trigger a need for reviewing the relevant permits within four years. It is possible that the introduction of BAT could lead to a

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requirement to invest in new technologies or reduce emissions to ensure compliance.

Derogations from BAT are permitted under IED, which will need to be annexed to the permit.

The following extract shows the Environment Agency's (EA) perspective with regard to IED implementation and changes it will bring about:

'The IED could lead to changes in the way we regulate existing facilities such as:

- the frequency we do inspections
- the extent of testing of the land before an activity commences
- the investment needed to meet the appropriate standards
- change or deregulation of certain activities
- new types of activities may need permitting in the waste, food and drink, and agricultural sectors'

According to the EA, by July 2015, around:

- 60 current waste exemptions will need to be permitted as installation;
- 300 current EPR waste operations will need to be varied to become installations.

Timescales

IED was to be implemented by 7th January 2013. Although this deadline has been missed (in England & Wales) the Directive and [amended Environmental Permitting Regulations](#) has now come into force. Any new installation, which starts operation, will need to comply with IED and the applications will continue to be assessed against Best Available Technique (BAT).

The transition period for existing operators ends on:

- 7th January 2014 – IED applies to existing IPPC installation;
- 7th July 2015 – IED applies to existing installations operating newly prescribed IPPC activities (for example, specified waste recovery activities, wood preservation)

The capacity threshold limits defines whether a waste operation becomes an installation:

- 75 tonnes per day, for Activities involving recovery, or mix of recovery and disposal, of non-hazardous waste (biological, physic-chemical treatment, pre-treatment prior to incineration);
- 100 tonnes per day, where the only waste treatment activity is anaerobic digestion.

Best Available Techniques

The Best Available Techniques (BAT) is guided by European guidance notes, so-called BREFs and associated BAT Conclusions. Under BAT based regulations these

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sites will be required to implement additional measures in number of areas, such as energy efficiency impact assessment, waste minimisation, and accident control.

The estimated review of BREF for Waste Treatment Industries 2006 is due to start this year, 2013. In the meantime, the EA is to publish guidance documents, which will be used as the basis for interim BATs for composting, anaerobic digestion and MBT activities which are based on Jacobs's Modernising Biowaste documents.

EA invites ORG to comment on the Jacobs' BAT guidance notes

At the end of last year the ORG was invited by the EA to provide comments on the Jacobs' BAT guidance documents for composting and MBT. More recently, this year, the ORG has engaged with the regulator regarding the BAT guidance on AD.

With particular reference to the Composting Technical Guidance, the ORG collated all comments received from the industry, which included feedback from compost producers, consultants, technology providers and local authorities. There has been a significant interest in this document and concern that if it was to be implemented in its present form, it would compromise the operation of the majority of sites currently operating in the UK. ORG hopes that the EA takes notice of these concerns and engages with industry prior to implementing any part of this document in the field. ORG's response can be found at:

<http://organics-recycling.org.uk/page.php?article=2517>

The Agency has recently informed the ORG that an EA's interim technical guidance on AD will be out for consultation shortly, in mid-April. Based on literature review and feedback from an earlier industry consultation, the interim technical guidance will be used until a post-Spring 2013 consultation version supersedes it. The ORG anticipates that the consultation will run for 6 weeks and that industry, AHVLA, trade bodies and other stakeholders will be invited to respond. The EA will emphasise that any requests for changes be evidence based and supported by peers, not just opinion. After the consultation closes, the EA will produce a Consultation Response Document (list of comments and EA responses to the substantive issues) and a finalised version of the guidance."

ORG's workshops on IED

ORG is planning to organise IED workshops for compost, AD and MBT operators to understand the implications of the directive and most importantly BATs implementation and requirement on the ground. The ORG has already invited the Agency to present at the workshops. Please, check ORG's web site for further details and the event dates.

6 WRAP annual survey of the organics recycling industry

Many thanks to those who assisted in providing data for this report. This report is the most recent and relates to calendar year 2012 making it more relevant than previous versions which were up to 2 years old at the time of publication. It is estimated that the report will be published in the summer.

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This survey has now been completed. Both parts of the survey have made good progress with composting reporting a 77% response rate, MBT 75% and AD 64%. In total 311 surveys have been completed.

Composting and MBT (Urban Mines)

For composting, as of 28-03-13 237 surveys have been completed representing c. 77% of the population. For MBT, 20 surveys have been completed ie. 75% of the population.

AD Sites:

A total of 54 surveys have been completed representing c. 64% of the population. There have been 6 refusals.

7 Health and Safety

Health and safety continues to be a major issue within the waste industry. Regrettably we work in one of the three worst industries for deaths and serious injuries. Judith Hackett, Chair of the HSE has stated that with 120 deaths in 7 years the whole waste industry must take steps to improve its health and safety record. If the waste industry as a whole does not take these steps then the government will almost certainly act.

7.1 ORG H&S working group

Historically the AfOR Health and Safety Working Group was extremely active and demonstrably successful in promoting health & safety and proving that the organics recycling sector is amongst the safer parts of waste industry. Within our new identity as the Organics Recycling Group of the REA we can now build on our past success and seek to promote health & safety to other sector groups within the REA.

In the past twelve months we have continued to run our quarterly health and safety monitoring surveys and expanded on our quarterly newsletter which now carries advice direct from the HSE. We now have a body of knowledge, derived from our surveys, on accidents arising in the organics waste sector. On a more practical level we ran a successful third dedicated health & safety event sponsored by London Waste combined with a visit to the sponsors site.

7.2 Waste Industry Safety and Health Forum

AfOR was a founder member of the Waste Industry Safety and Health (WISH) initiative, we will continue to support WISH in our new identity. REA Chief Executive Gaynor Hartnell has fully committed the REA to support WISH.

WISH has been developed by a small group of companies and trade organisations over the past few years and was opened to the waste industry in general at a

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conference held in February of this year at Solihull. Approximately 150 delegates attended the event, key note speaker Judith Hackett CBE, Chair of the HSE explained the very poor health & safety record of the industry and asked delegates and their respective organisations to engage with WISH for the benefit of the whole waste industry. Topics discussed at this event included health & safety lessons learnt from the London Olympics, and trade union involvement in health & safety. Following lunch delegates split into five workshop groups to discuss areas relating to health & safety. It was interesting to note that when the workshop leaders reported back to the conference there were several recurring themes identified as obstructions to good health & safety practice. The event was closed by Heather Bryant Director of HSE Southern Division and Waste Management & Recycling Division Industry Strategy Lead. Heather reinforced the message of the day “the waste industry needs to improve its health & safety culture”.

8 Scotland activity update

There is a committee to support and direct the Scottish ORG group activities. The members are the formerly elected AfOR Scotland Committee. Members are:

- Grant Keenan, Keenan Recycling Ltd (Chairman)
- Tommy Dale, Forth Resource Management Ltd (Vice-chair)
- Audrey Litterick, Earthcare Technical
- Debbie Neely, Entrust Environmental
- Fiona Donaldson, SEPA
- Mike Hogg, Zebec Energy
- Mike Orr, the TEG Group
- Bruce Moffatt, Veolia Water Organics Recycling
- Richard Irvine, Independent Consultant
- Stuart Fraser, William Tracey Group

Activities of the Scottish branch are in line with the Organics Recycling Sector Group objectives with a focus on Scotland and the different regulations and policy that are in place. The committee meet approximately 5 times a year to discuss events, consultation responses and other issues relating to organics recycling in Scotland.

Recent activities have included:

- Writing to Zero Waste Scotland and to the Scottish Government highlighting their concerns over the Scotland Excel framework tender for organic waste treatment and also outlining the issues surrounding feedstock contamination.
- Responding to the Scottish Government’s Consultation on the Recyclate Quality Action plan.

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- Presenting at an event for the golf industry about PAS100 compost.
- Reviewing SEPA's draft position on Bioaerosols.

The next event is a half day seminar followed by a site visit. This will be held on 28th May in Whitburn with topics including food waste collection, manufacture of soils, update from Zero Waste Scotland and a case study about the Polkemmet land restoration project.

There is a conference and dinner planned for November and a PAS100 training course for autumn.

For any information relating to the Scottish activities, please contact Jenny (jenny@r-e-a.net or 07796 4301668).

9 European End of Waste for compost and digestate

9.1 The development process

The European Commission's Joint Research Centre has commissioned its Institute for Prospective Technological Studies (JRC-IPTS) to review information on production and quality standards for composts and digestates and propose End of Waste (EoW) criteria. After finalisation, JRC-IPTS's technical report will be reviewed by the European Commission, who intend to draw up EoW criteria for composts and digestates made from biodegradable wastes. The drafted EC 'Commission Decision' will then be put forward to the European Parliament for consideration and voting. If, after political negotiation, it gains majority support from the EU Member States the Commission Decision will enter into force on a specified date after it has been laid as legislation.

JRC-IPTS's consensus building process began in February 2011, when for the first time it circulated to a Technical Working Group its first draft technical report. This report included outline of EoW criteria and since its circulation, TWG members have participated in 3 workshops, responded to six JRC-IPTS calls for information and views, collaborated with industry and other stakeholders to feed back their views, and liaised with companies who process various types of biodegradable wastes and sewage sludges to provide samples for testing during JRC-IPTS FATE COMES study.

ORG has been a member of the TWG since its inception and has also participated in UK-focussed meetings held by Defra, ADOWG (see section 10) and the Anaerobic Digestion and Biogas Association. ORG has also contributed to Defra's work carried out in spring/summer 2012 to assess impacts of EoW criteria proposed in JRC-IPTS's second draft technical report.

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9.2 Significance

If EU EoW criteria will enter into force in future, they will supersede any 'same scope' EoW criteria that any EU Member State already uses. The scope of EU EoW is likely to include the key types of source-segregated biodegradable wastes that we transform into composts and digestates in the UK. Consequently, the British Standards Institution's PASs for composts and digestates would be superseded, as too would the compost and digestate Quality Protocols that currently define End of Waste criteria applicable in England, Wales and Northern Ireland.

Our current certification schemes (REAL's Biofertiliser Certification Scheme for digestates and Compost Certification Scheme) would be realigned to the EU EoW criteria, and the European Commission is aware that the UK would need a reasonable amount of time to transition from compliance with our current national EoW criteria to the prospective, new EU ones.

9.3 Mixed municipal wastes (residual) and sewage sludges

EU EoW criteria are likely to exclude from their scope Separated Organic Materials* derived from Mechanical and Biological Treatment of mixed municipal solid wastes (also known as residual wastes). If they do, it would be possible for any EU Member State that wished to, to set its own national EoW criteria for SOMs.

* Formerly termed 'Compost-Like-Outputs' and 'Digestate-Like-Outputs', abbreviated as CLOs and DLOs.

9.4 Next steps

After receiving the TWG members' (April 2013) responses to JRC-IPTS's most recent call for further information, JRC-IPTS will prepare an updated technical report. It is estimated that the TWG will receive the report for review and comment during summer 2013. It is difficult to estimate by when JRC-IPTS will submit its final report to the European Commission and, if a Commission Decision is drafted, it is not known whether it will be supported by majority vote in the European Parliament.

ORG will keep members up to date by adding to the information available at <http://www.organics-recycling.org.uk/category.php?category=1145> and highlighting latest developments in our e-news communications.

If you wish to discuss EU EoW issues with ORG, please contact Emily Nichols (07771 556231, emily@r-e-a.net).

10 AD Operators Working Group

The AD Operators Working Group (ADOWG) was established to represent the interests of independent AD Operators and to provide a forum for discussion on key issues affecting the sector.

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The last meeting was held at Cassington following a tour of Agrivert's AD plant. The key issues discussed were the EU EoW and ADOWG's position on the most recent request from the JRC for responses to their key questions, which included Potentially Toxic Elements and organic pollutants, inclusions in the positive list for input materials to AD processes, and sampling and analysis.

Discussions also covered the PAS 110 review process and in particular the RBP test and the issues caused by PAS 110 limits for PTEs and physical contaminants being set on a dry matter basis. The group also discussed relevant issues regarding digestate management, repackaging waste and the possibility of a plant authorisation scheme.

ADOWG is now represented by Mike Orr on the BSI Steering Group that will review PAS 110.

The next ADOWG meeting will be held in mid May.

If you are an AD operator and would like to attend future meetings please contact Mike Orr on 07976 132975.

11 Publicly Available Specifications

11.1 WRAP consultation on the recommendations from three projects procured to examine critical aspects of PAS 110

During December 2011 a series of workshops were hosted by WRAP, the Environment Agency and SEPA to obtain feedback on PAS 110:2010, the AD Quality Protocol and the Additional Scheme Rules for Scotland (ASRS). A further workshop to discuss PAS110 and the ADQP was hosted by NIEA in Belfast during July 2012.

As a result of these workshops WRAP procured projects to examine the three aspects of PAS110 that had attracted most feedback from the AD industry:

1. The digestate stability (RBP) test;
2. The near universal pasteurisation requirement;
3. The PTE (Potentially Toxic Element) limits.

WRAP consulted the UK AD industry on these recommendations given in the three above reports and a number of other aspects of the PAS. Feedback from the industry will be forwarded in due course to the BSI-convened Steering Group that will oversee the formal review of the specification.

The ORG submitted to WRAP:

- Feedback provided by AD operators and other stakeholders, and
- A response with REA's views.

If you are interested in reading REA's response, please contact Kiara Zennaro (07717 294793, Kiara@r-e-a.net).

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11.2 PAS 110 consultancy support

WRAP has renewed its PAS 110 free consultancy support for the financial year 2013-14.

Plants committed to certification under PAS110 and ADQP (Anaerobic Digestion Quality Protocol) /ASRS (Additional Scheme Rules for Scotland) can apply for a maximum of 3 days' consultancy support. It is intended that the support should assist plant operators to adapt systems and procedures to enable the plant successfully to achieve certification.

The Biofertiliser Certification Scheme will once again administer the consultancy support. We have changed the criteria for the consultancy support to include both operating plants and those at an early stage of development.

The two organisations that have been appointed to provide the consultancy services are the Organics Recycling Group and Aquaenviro.

If you are interested in receiving the support, please contact Ciaran Burns (cburns@biofertiliser.org.uk).

11.3 PAS 100 Agriculture Working Group

Initial discussions are being held on whether it might be feasible to amend PAS 100 so that it better suits the specific needs of the agricultural sector. A small working group chaired by Alexander Maddan (ORG Chair) will be holding its initial meeting in early June.

12 Keep on Track Project

The REA is the UK partner for a three year European project called '[Keep-on-Track!](#)', overseen by EREC. The project seeks to ensure that the UK remains on track to achieve (or even exceed) our renewable energy deployment targets under the Renewable Energy Directive. One of the main project tasks is to analyse the barriers that are preventing or slowing deployment.

The aim is to identify the priority areas where targeted activities can help to unblock the barrier or accelerate progress. This can range from high-level policy issues down to the regulatory and institutional issues encountered when trying to progress specific projects. Clearly the role of the main renewables incentives is crucial but the aim for those is to suggest how they can be made more effective rather than argue that their budgets needs increasing. The project seeks to estimate the rate of progress towards targets. In May a publication will be released showing:

- Progress
- Barriers
- Recommendations
- Events to promote the scheme

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The website of the Keep on Track project, managed by EREC and for which the REA is the UK partner, is now live. Although it has not yet been formally launched, some content is already available. The URL is www.keepontrack.eu and click [here](#) to see relevant media work to date by the REA.

13 ORG activities in Europe (in addition to activities described in section 9)

13.1 European Compost Network

ORG is an active member of European Compost Network (ECN), and is represented in nearly all ECN Working Groups:

- WG1 European Policy
- WG2 Quality Assurance
- WG3 Integrated Biowaste Management
- WG4 Anaerobic Digestion

To read more about ECN's activities, visit <http://www.compostnetwork.info>

You can read ECN latest bulletin at <http://www.organics-recycling.org.uk/ECN>

Amongst other topics, the bulletin includes information about:

- The Commission's plans to review key targets (including that for biowaste) and carry out an ex-post evaluation of waste stream directives.
- Developments related to the revision of Fertilisers Regulation (EC) No 2003/2003
- New elected ECN board
- A report published by the JRC on occurrence and levels of selected compounds in European Sewage Sludge Samples; and
- A Green paper on plastics

13.2 EU Ecolabel criteria for Soil Improver and Growing Media

As part of the revision process of the existing EU Ecolabel criteria for growing media <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2007:032:0137:0143:EN:PDF> and soil improvers <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2006:325:0028:0034:EN:PDF>, the JRC-IPTS and Ricardo-AEA has invited the ORG to complete a questionnaire prepared to inform and gather industry and other stakeholder input and opinion. The data provided by means of this questionnaire will help the JRC to understand current products and market conditions, and collect preliminary data of their environmental performance.

-END OF PROGRESS REPORT-

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