

To:
Roger Hoare, Environment Agency
Fiona Donaldson, Scottish Environment Protection Agency

25 July 2014

Dear Roger and Fiona,

PAS 100 review

You may be aware that a review of BSI PAS 100:2011 specification ('PAS 100') is long overdue. In light of this and having taken into account the views of its members, REA is considering initiating a review of the specification in the autumn.

As you know, compliance with PAS 100 is currently required by the environmental regulators to demonstrate compliance with End of Waste¹, so it is clearly very important for the industry to understand what the Environmental Regulators expect from a review of the PAS 100 for the standard to continue to be the basis for the End of Waste positions.

With this letter we are seeking the regulators' clarification on the questions listed below as a matter of some urgency.

Compost stability in PAS 100

As you know PAS 100 currently includes a requirement for testing for compost stability and specifies a threshold for this parameter. Compost stability is one of the most controversial elements of the current standard as it is deemed to be of little value when the intended use of the compost is agriculture; in fact it arguably has a negative impact on the beneficial use of this material to land as more stable compost reduces the agronomic benefits provided to the soil and plants. There is ongoing work jointly procured by WRAP and the EA trying to address a number of questions related to the PAS 100 compost stability test and its associated threshold². We would welcome discussing the implications of the findings of this project with the regulator and WRAP at the earliest opportunity.

In light of the above, it is important that the environmental regulators clarify well in advance of a PAS 100 review what is the purpose of including a test for compost stability and an associated threshold in the PAS 100 specification in order to achieve End of Waste status and if there are any other requirements that we should be aware of for compost to achieve End of Waste Status. We are keen to ensure that PAS 100 (or its reviewed version) continues to be recognised as the accepted standard in the Compost Quality Protocol or SEPA's EoW position.

You may be aware that WRAP will not fund any future review of the PAS 100/PAS 110, so it is now more important than ever to be able to estimate what the cost of a review of PAS 100 is likely to be - including any R&D work required to inform the review - as the likelihood is that industry will need to fund any review of PAS 100 in the future. It is therefore absolutely crucial that we understand what is required by the regulator right from the start. This will assist us and the industry in avoiding delays as

¹ PAS 100 is the only standard recognised in the Compost Quality Protocol and in SEPA's position statement to demonstrate compliance with End of Waste

² WRAP project code OMK009-001, report not published yet.

those we have seen for the PAS 110 review, or to incur significant and unforeseen cost during the review.

We would appreciate if you can respond in writing to the following questions with a matter of some urgency. We would also appreciate a meeting at the earliest opportunity with you and WRAP to discuss your answers to the questions below. Even if you are unable to give a definitive position, it would be helpful to understand your initial views in order to understand how to take this further.

Question	Answer
Is the inclusion of an indicator for compost stability in PAS 100 and an associated threshold required by the environmental regulator for the purpose of demonstrating compliance with End of Waste (EoW)? i.e. that the compost has ceased to be waste and can be regarded as a product.	
If yes to the above question, will you require the standard to include a threshold for compost stability?	
If yes to the previous two questions, what is the purpose of the test and the threshold and what evidence is this based on?	
And on what basis will the threshold be set?	
Are there any other requirements that we should be aware of/consider within the review of PAS 100 to demonstrate compliance with End of Waste?	
The PAS 100, unlike PAS 110, includes a plant response test, which is a single multipurpose test assessing weed content, tomato seed germination, seedling growth and abnormalities in a sphagnum peat medium containing 20 to 33 % by volume of the compost sample under evaluation. The test should detect any significant phytotoxic factors in the compost. Would this or an equivalent method instead of compost stability not be sufficient to meet the requirements of the UK environmental regulators? If no, why?	

Yours sincerely,



Senior Technical Officer, REA