

ORG - PAS100 comments on draft - January 2018. FINAL

Section	Title	Comment	Proposed change
0.4	Changes from previous edition	We would like to know if there will be a transition period once the PAS100 is published to allow sites time to comply with the new requirements.	Add information about a transition period for complying with the requirements of the new version.
4.2	Compost quality	It is important that it is clear that this PAS is a 'Baseline Quality' and that there is every opportunity to manufacture compost to a higher or more stringent standard as set by individual customer requirements in order to meet their specific needs.	Make it clear within the introductory text describing the PAS that this is a 'baseline' standard which can be improved on to meet specific market requirements.
4.4.1	Safety and Quality Control System	'Each composting batch shall undergo the CCP for each hazard identified by the composter. Under each CCP the composting batch shall be monitored and managed such that the process step operates within its defined CLs'. This is not correct in HACCP terms - CCPs should be allocated to hazards which are significant, and could result in a serious problem only.	Make test clear that CCPs only need to be allocated to significant hazards.
4.5.3	Training and competence	It is important that there is clarification as to what constitutes 'ongoing competence', for example does attending internal training courses count towards this?	The provision of clear guidance on what constitutes 'ongoing competence' to operators.
4.10.1	Complaints	This is a good amendment as it ensures that there is a well documented and agreed methodology for dealing with complaints. This should also cover complaints from the general public and will ensure that in the absence of the site Manager there is a 'common position' from the site.	Retain suggested comment.

4.11.2	Internal audit	There needs to be clarification as to what constitutes 'trained commensurate with his/her duties' as training comes in many different forms from in house training to attendance at external courses, what is deemed to be acceptable?	Clarification on what training is deemed appropriate? Internal training should be acceptable as external training can be costly and have negative impact on small companies.
5.1.1	Input materials	One of the most prevalent issues facing the sector is that of the inclusion of non-target material, particularly plastic within feedstocks presented by local authorities. Although there is a specific plastics limit within the PAS of 0.12% achieving this requires significant cost and effort from the operator through no fault of his/her own. It is important that operators work closely with their feedstock supplier to reduce this contaminant loading as this inevitably leads to reduction in output quality. Local authorities are on one hand demanding PAS 100 status for compost but failing to deliver feedstock quality that can meet the stringent levels imposed within the Standard.	A reference specifically targeted at local authorities within the document that points out to them that they have a 'duty of care' when supplying composters to ensure that feedstock contamination is minimised. The regulator (The Environment Agency) is now taking this issue more seriously and alerting local authorities of their duty. Add in about the need for composters to ensure that the quality of feedstocks into the process enables them to produce the quality of compost they require.
11.5	Independent sampling	We have mixed views on this from our members. We need more information to assess the impact. The cost of independent sampling has not been calculated or shown and given the widespread location of sites within the UK, there would need to be a National sampling service implemented to carry out a sampling regime nationwide. The cost of taking independent samples would be significant for all operators and for the smaller sites may act as a further disincentive to continue to be PAS certified. The timing of sampling is crucial and often either for operational reasons or as a result of climatic conditions (heavy rainfall), screening will not have taken place on the day anticipated which means that samples for testing cannot be taken. Samples also have to be submitted to laboratories at the beginning of the week (between Mon-	We require costed proposals on a sampling regime which considers a range of options from annual independent sampling to every sample being taken independently, only then can a decision be taken on this as a viable option. This proposal would add significant credibility to the scheme, however it needs to be affordable or it will be act as a disincentive to operators joining or staying on the scheme. Many of our members (particularly those with large tonnage and/or multiple sites) do not support this as they are concerned about the massive cost implications.

		Wed) to ensure that they are dealt with in a timely manner so they do not spend excessive time in transit over the weekend which increases their risk of getting warm and thus changing the test results adversely.	
12 Table 2	Sampling	<p>Inputs to composting sites throughout the year vary significantly between the Spring, Summer and winter months and this in turn has an impact on the compost output from the sites. This recommendation is to ensure that samples are more indicative of the full year's inputs rather than just representative of a short period of the year when samples are taken from sequential batches of compost. For smaller sites however this may add additional cost, so this proviso should only apply to sites over a specific throughput per annum.</p> <p>There is no reason why tonnes should not be used as a metric rather than m3, the former is much easier to manage as all sites have a weighbridge on site.</p>	We support the proposal as suggested. We have had a concern raised by a member about the timing between samples as usually sampling is avoided pre-harvest when farmers are rushing to stockpile material. An unexpected failure at this time of year would have catastrophic effects on site production and the farmers fertilizer plans.
13.1	Minimum compost quality	<p>Some of our members would like to see a market based approach when considering the minimum compost quality required and different limits set for different market, i.e. agricultural grade and horticultural grade. We feel this approach needs further discussion and consideration. A suggestion is to have 2 groups –Group 1. Agriculture, Field Horticulture and Land Restoration (applications where compost is applied direct to land in smaller amounts) Group 2. Growing Media, Amateur/professional Horticulture & Soft Landscaping (applications where the compost is going to be suspended in a mix or applied direct to land in more concentrated amounts)</p> <p>Producers would need to declare the market to which their grades of compost are being supplied and the annual amounts. E.g. 40mm grade to market group 1 and an annual tonnage of 12000 tonnes. This would allow testing</p>	Consider a market based approach with market specific limits. Suggest two groups for the market based approach. Further discussion with end users such as NFU / Red tractor etc to develop appropriate limits.

		to be tailored to the market requirements and the removal of tests.	
Table 3	Minimum compost quality	<p>Table 3, Item 1: E-Coli. Current sampling for E-Coli takes place after screening which is the normally the completion of the designated 'minimum composting process' time written into their Standard operating Procedure (SOP). Compost will have spent some time in a maturation phase during the minimum composting process and often there is re-contamination of the material due to animals such as birds, foxes defecating on the compost piles, this can result in subsequent test failures. We have also had feedback that the test methodology should be aligned to the ABP methodology as is taken as an average and more reliable.</p> <p>Table 3, Item 10: Stability Level. The proposal to increase the microbial respiration limit from 16 to 20 is a beneficial step. It is important that the Standard is fit for purpose in today's market which is predominantly led by the agricultural sector. When compost is added to soil, the dilution factor is significant and there is no evidence to support that the proposed limit confers any agronomic disbenefit.</p> <p>Table 3.Item 12: Physical Contaminant Test. Plastic contamination within the incoming feedstock to composting sites is a significant issue. There is however a difference in the impact different plastics have on the compost quality. 3D hard plastics such as bottle tops are very different to light 2D plastics such as plastic film. The latter once shredded has a greater detrimental impact on the environment. Consideration is needed for having separate limits for dense plastic and plastic film. The test</p>	<p>Table 3, Item 1, E-Coli: It is proposed that sampling for E-Coli is taken either post the 'sanitisation' step of the process as this indicates whether or not this sanitisation step has been efficient in reducing the pathogens to an acceptable level or taken at the end of the process as currently. Sampling methodology to be reviewed and ABP methodology considered.</p> <p>Table 3, Item 10:Stability Level. From the options, It is proposed that the stability level be increased from 16 TO 20 mg CO2 organic matter/day. We would like to see more work done to determine the appropriate level for food waste derived compost.</p> <p>Table 3, Item 12: Physical Contaminant Test: Test methods need to reflect the difference in plastic types rather than pool them altogether. Dense plastic could be considered in the total physical contaminants limit with a separate (tighter) limit for film plastic. The test methodology reliability needs to be considered, possibly an average of several samples.</p> <p>Table 3. Items 13a,13b:Stones limit. Increase the size of stones considered in Table 3 from >4mm to >10mm. It has been suggested by a member that bulk density should be established and move to calculating the limit by volume.</p>

		<p>methodology reliability has been questioned by some members.</p> <p>Table 3, Items 13a, 13b: Stones limit.</p> <p>We support an increase in the stones level from 4mm to 10 mm. There is no evidence to support that this would be detrimental and the NFU who's members are widespread users of compost support this change. We have had feedback from composter users and agronomists to support this change. It is important that the Standard as set currently does not act as a disincentive to recycle materials to land and meets the needs of industry in the 21st Century. Consider if bulk density needs to be taken into account when considering the limit.</p>	
Table 4	Plant response test	<p>Table 4. Plant Response Test:</p> <p>There is increasing evidence from operators that they often fail to meet the requirements of this test during the darker winter months when plant growth is impacted by the lower light levels. If there is evidence to support this from the laboratories carrying out the tests then this test is clearly not fit for purpose operating as it does. There needs to be a different methodology adopted that caters for this seasonality effect and the test should be conducted in a 'growth room' rather than a conventional greenhouse. Some of our members feel that whilst germination and weed seeds are important, the growth part of this test is irrelevant for compost used in agriculture as there are other meteorological and ground conditions that have a far greater effect on plant growth. Alternative test methods should be considered.</p> <p>Field Bean germination test, NOTE:</p> <p>The REA supports the proposed suggestion to use the Field Bean germination test for materials destined for the</p>	<p>Table 4. Plant Response Test: Change the 'acceptable' methodology for the conditions under which the plant response tests are carried out which ensures that light levels are consistent all year round.</p> <p>We would like to discuss a modified test for compost used in agriculture where germination and weed seeds are assessed without plant growth. Alternative test methods could be considered.</p>

		growing media market in light of the possibility of herbicide residues being found.	
14.4	Non-conforming material	<p>Clause 14.4, Non-conforming material dispatch protocol.</p> <p>The REA supports the current position whereby the operator is duty bound to inform the regulator and recipient that the material dispatched has failed the PAS 100 testing. It is not practicable for a site to retain compost on site for a further six weeks (whilst the PAS 100 growing trials are conducted) and during busy periods in the growing season (Spring and Autumn), many sites would not physically have the space available to allow them to keep compost on site for longer. We do not support option 1.</p>	<p>Clause 14.4, Non-conforming material dispatch protocol. Maintain the current ruling that the operator informs the regulator and recipient as soon as they know of a test failure (option 2).</p>
Annex B	Recommended tests	The REA supports the recommendation that soils are tested in advance of any applications of compost as this ensures that applications are made at the correct rates in light of the relevant crop requirements.	The REA supports the above recommendation.