

ORG members' views on revision of PAS100.

This paper summarises the feedback from ORG members regarding PAS100 and the revision on some of the more significant issues. ORG gathered feedback from members at the start of the revision process and collated these and provided to REAL in advance of the publication of the first draft. ORG also circulated the consultation on the draft to members and collated comments received and held a webinar for members to give them an overview of the proposed changes. Following the webinar, members were asked to complete a short survey to give some feedback on some of the more significant changes. Both comments and the survey were used to develop the ORG response to the consultation.

Members' feedback

The feedback below has been split into comments on specific clauses and includes survey results and comments from members.

HACCP (4.4)

- 'Each composting batch shall under go 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'. Need to modify text to make it clear that CCPs should be allocated to hazards which are significant, and could result in a serious problem only.

Input materials (5)

- Consider including specified limits on contamination of incoming waste, especially kerbside collected.
- 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.
- 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.

Independent sampling (11.5)

Survey – Do you support independent sampling?

Answers: No = 13 Yes = 3 Yes in principle, as long as not too costly = 8.

- Nightmare to manage and cost would be unfeasible.
- Independent sampling of EVERY sample sent for testing to demonstrate compliance is neither financially nor operationally viable for a small company that operates multiple, high capacity sites. Sampling sent during validation yes, and the current



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programme of random independent sampling should remain. Is there sufficient evidence to suggest there is a problem with sampling and if so should sampling techniques and training be focused on first prior to significantly raising costs for operators.

- It will add costs but if managed correctly should not be prohibitive and by protecting markets would ultimately be very good value. Suggest a minimum of one sample must be taken independently so for very small producers that might hurt a bit financially, then initially all others must have for first year at least 60% of samples taken this way, then if operator's own and independent test all pass, following years reduce to 40% sampled independently. On the other hand if operator's test always pass and independent tests always fail, maybe that operator will have to have all tests done independently.
- Very concerned about proposed independent sampling for every sample, mostly about cost but also inconvenience.
- Object to this change as no cost assessment has been carried out and we believe it will be cost prohibitive option and delay in sampling and testing which already takes up to 6 weeks. This will be a massive increase in costs of maintaining certification. If REAL believes that composters are not testing correctly they should stick with spot checks and cover these costs. We believe that PAS100 audits should verify if samples are taken correctly rather than assume that this not the case.
- Fundamentally I believe independent sampling is a retrograde step, it shows a distinct lack of thrust in the industry and an admission the PAS 100 Standard is not working. Two major hurdles, logistics and cost.

Interval between samples (12, table 2)

Survey – Do you support the interval requirement between samples?

Answers: No = 6 Yes = 17.

- I'm sure most sites will avoid the months before harvest for sampling simply because of the risk of a failure when time is not on your side for getting material off site. We also avoid sampling when it's raining because it seems to have an impact on increased Ecoli levels.
- Happy with suggested compost sampling intervals.
- Support this change.
- Interval of sampling depends on size of windrow and should not be reduced further.

Table 3 Parameters

Market based approach

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 –



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- 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)

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 to be tailored to the market requirements and the removal of tests.

E.coli test

- Change the sampling point to after sanitisation to demonstrate sanitisation has occurred but avoids failures due to re-contamination.
- Failures of up to 2000CFU/g are not an issue for agriculture so some allowance for minor failures would be useful.
- Reliability of test method could be improved, ABP approach where it is an average result over multiple samples.

Stability Limit

Survey – What stability limit do you support?

Answers: 16mg/CO₂/day = 10 20mg/CO₂/day = 13.

- A microbial respiration rate of 20 mg CO₂/ g organic matter / day is preferred.
- Limit could be based on an average over a set number of results.
- Stability within reason is irrelevant to agriculture and land restoration uses due to the dilution factor when applied.
- Support 20mg
- 20mg sufficient for agriculture grades only.
- Food waste sites struggle with Stability due to the increased levels of salt, low pH and high EC. We quite often have CO₂ results inbetween 20 - 23 on a 9 week process. Could more work be done on food waste limits to determine the correct upper limit please.

Physical contaminants limit

- Different impact of plastic film versus hard / dense plastic when spread - should be reflected in limits? i.e. from a visual perspective 1 lego brick is very different to the equivalent weight in film plastic.
- Test method not reliable.

Stones Limit

Survey – What size of stones do you support?

Answers: 4mm = 3 10mm = 19.

- 10mm stones is preferred – arable farmers not concerned by these.



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- Happy with current limit and should only be raised for agriculture grades.
- Support 10mm size.
- Testing method should be more consistent, maybe an average of samples. Take into account bulk density for stones limit.

Plant response test

- Test method doesn't take into account the massive dilution factor when compost applied to soil.
- Plant growth not relevant for agriculture - plenty of meteorological and ground conditions that have far greater effect on initial plant growth.
- Look for an alternative plant response test or remove requirement for larger grades destined for soil borne applications which are less sensitive.
- Test is not fit for purpose - The test should be done in a growth room where light intensity is equal all year round. We have just had an invalid test where even the control plants failed to reach 2g. Even the lab staff admit that the weather was so dark and gloomy (even with supplementary lights in the glasshouse) that it was not possible to complete the test.
- Field bean test for herbicide residues – good idea but only for compost supplied to growing media.

Sampling (14.4)

Survey – What option do you prefer for batches sampled?

Answers: New, Quarantine on site until results received = 1.

As current – Can dispatch and have to notify recipient and regulator of any failures = 22.

- The time period to test a sample, due mainly to plant top growth, restricts the amount of time that a batch relating to that sample can be kept on site due to space. It would be operationally unachievable to keep potentially multiple batches on site until their full test results came through without restricting input material and therefore potentially forfeiting contractual obligations. If an alternative plant top growth method was used where it did not take so long, or abandoned altogether, then I could keep batches on site until test result came through. In the absence of this, I would support option 2.
- Prefer option 1
- Would like to keep current rules.
- Support leaving it as it is.
- Option 1 not supported.