REA response: *REAL's Compost and Digestate Physical Contaminants & Stones test method revisions consultation*

12th November 2025

The Renewable Energy Association (the REA) is a not-for-profit trade association, representing British renewable energy producers and clean technology and promoting the use of renewable energy and the circular economy in the UK. It has around 400 corporate members, making it the largest trade association of its kind in the UK. More info available at www.r-e-a.net.

The REA Organics Forum is largely comprised of businesses working in the management and treatment of organic waste (e.g., composting facilities and AD plants). Many of our members are also participants on REAL's Compost Certification Scheme and Biofertiliser Certification Scheme. Moreover, the methods described in this consultation are also used for testing non-certified composts and digestates (e.g., uncertified grades or output types from a certified process and composts/digestates produced using processes that have no certification).

In response to REAL's Test Method Working Group (TMWG) consultation on proposed updates to the PC&S methods for compost and digestate, we are pleased to submit the following.

Note: Summaries of the proposed changes are written in blue, the REA's comments are in black below.

1. Organic contamination of physical (plastic) contaminants

Proposed change: Add the following text for both PC&S methods

Remove loosely bound organic material from physical contaminants prior to weighing as necessary using a soft bristle brush (e.g., small paint brush). Do not unfold or rub physical contaminants to clean them of trapped or tightly bound organic material.

We support the move to standardise the process between the labs by making cleaning an explicit part of the method(s). This change also seems to offer an improvement on the accuracy of the method, which is meant to measure the mass of PCs, not the OM stuck to them. While we view the reduced plastics limits in the RFs as a positive step, this means it is especially important that the test methods enable labs to provide results that are as accurate as possible and that labs do not count/report organic particles as PCs (as far as practicable without causing fragmentation of PCs, including plastic PCs).

In terms of how this change should be introduced, we agree that keeping PCs intact is important for the integrity of the method (which is a worry with the 'dry rubbing' approach), and therefore a gentler approach seems sensible. We would prefer that the method permits lab analysts to attempt to gently unfold plastic films to remove bound OM, if they feel it can be done without risk of fragmentation. However, we acknowledge this reintroduces some room for interpretation between individual labs/lab analysts. Without visibility of the methodology, we are not clear if further fragmentation would mean that any particles that become smaller than 2mm due to the 'cleaning activity' would not be counted. It is important that the results are accurate, but every effort is made to only count the physical contaminants, not the organic matter stuck to them.

York House,
23 Kingsway London,
WC2B 6UJ

http://www.r-e-a.net/
Tel: 020 7925 3570

2. Reporting and weighing accuracy

Proposed changes:

Make the following changes to the digestate PC&S method:

- *Adding detail on reporting plastic contaminants separately from total physical contaminants*
- *Specifying that weighing of physical (plastic) contaminants should be carried out using a minimum 4 dp balance and reported to 3 dp*

Make the following changes to the compost PC&S method:

- *Specifying that weighing of physical contaminants should be carried out using a 4 dp balance and reported to 3 dp*

For reference, Table 1. New digestate plastic limits reporting to 2, 3 and 4 dp

Total N (%)	kg/t	<1	1-1.9	2-2.9	3-3.9	4-4.9	5-5.9	6-6.9	7-7.9	8-8.9	9 or more
8% 2 dp	kg/t	0.00	0.01	0.01	0.01	0.01	0.02	0.02	0.02	0.03	0.03
8% 3 dp		0.003	0.006	0.009	0.011	0.014	0.018	0.020	0.023	0.026	0.029
8% 4 dp		0.0032	0.0056	0.0088	0.0112	0.0144	0.0178	0.0200	0.0232	0.0256	0.0288

While we have no strong objection to the suggested changes, we would like to pose a few clarifying questions:

- If the updated method is to specify the use of a 4 dp balance, why would labs be asked only to report to 3 dp? Why would they not be asked to report results to the full 4 dp? Additionally, will reporting only to 3 dp, be acceptable to the UK regulators – i.e. have they agreed the limits in the 3dp row in the above table? This is relevant because the ADRF-induced tighter limits mean that, on a technical basis, reporting to 4 dp is necessary for assessing and reporting whether the sample has passed or failed.
- In the case of the compost PC&S test method, would weighing and reporting to the same number of decimal places as will be done for the digestate PC&S test method represent 'efficient practice' for the labs and minimise risk of accidentally using the wrong number of dps, when the same lab weighs and reports plastics and total PCs results for digestates and (separately) composts? If yes to both, we support alignment of the number of dps the compost and digestate PC&S test methods instruct to be used.
- Given the method change rationale the TMGW described and the ADRF's introduction of a plastics limit, we agree it is necessary to add to the digestate PC&S method a requirement to report plastics (as a specific sub-set of total PCs). We are aware that in practice the REAL-appointed labs already do such reporting, likely driven by introduction of a plastics limit in Scotland in 2017. We ask to see, in due course, the revised PC&S methods for testing digestates and composts.

3. Sharps determination

Proposed change: Add the following text for both PC&S methods

Each suspect sharp should be confirmed as sharp by a second person in the laboratory with experience of the method. If the second person agrees with the first person, the sharp is confirmed. If the second person does not agree, a third person (e.g., laboratory manager) will take a final decision.

Physical contaminants whose original intended use was to penetrate or cut (e.g., hypodermic needles, metal screws/nails/pins, blades) are likely to be classified as sharps unless their form has changed significantly rendering them no longer 'sharp'.

We generally agree with the proposed changes. It seems sensible to have a second or even a third opinion so that the onus does not fall entirely on one lab analyst and any suspected sharps can be confirmed by a second or third individual. REAL's second paragraph of planned additional text gives examples of the kinds of objects that may constitute sharps; this seems sensible as well.

We'd like to provide two additional suggestions for the method, relevant to sharps:

- The methodology should include a requirement for the lab to take a clear and close-up photo of any 'sharp' and provide the photo to the operator on request. This may already be in the test method, but an operator would find it useful information to have.
- The methodology should instruct lab analysts to include a short description of the type of sharp that was found, if the method does not currently include such an instruction.

Concluding comments: Generally, we find the proposed changes reasonable and have made some specific comments and questions, which we hope you'll find useful. In order to provide this feedback, we had to make several assumptions about the contents of the methods as we were unable to review the full PC&S methodologies as currently written. We understand the TMWG has plans to revise other Scheme-relevant test methods in future and would be happy to provide input at the appropriate time. However, in future consultations, we'd strongly encourage REAL to supply consultees with the current version of the methodology being consulted on. If full transparency of the methods is not an option, we'd ask that the REA be permitted to access the method for our own reference during the consultation period and to help members provide informed feedback.