The CIWM is the professional body for the resource and waste management sector. It represents around 5,500 waste and resource management professionals, predominantly in the UK but also overseas. The CIWM sets the professional standards for individuals working in the sector and has various grades of membership determined by education, qualification and experience.

**PAS 100 Consultation**

CIWM welcomes the opportunity to respond to this update review consultation and offers the following feedback. CIWM has asked its Biological Treatment special interest group for comments and these form the response below.

|  |  |  |  |
| --- | --- | --- | --- |
| **Section ref** | **Ed, T, G** | **Comment** | **Suggested change** |
| Contractual and legal considerations Pg. 3 | G |  | Consider adding Zoonoses Order 1989 |
| Contractual and legal considerations Pg. 4 | G | There is other guidance available but not listed, e.g. managing odour on waste sites. | Consider adding in other guidance. |
| 0.3 Control of hazards Pg. 7 | G | There is no mention of the scheme rules here. | Consider whether the scheme rules should be included/referenced. |
| 14.4 Pg. 44 |  | Under Option 1 - What if it fails and other batches have been dispatched? What is the requirement for those batches?  This means that contaminated material is not spread to land, reducing pollution incidents. | Option 1 preferred. |
|  | G | Independent checking of final product and monitoring conditions (temperature particularly). No reference to the scheme rules but these include monitoring and system requirements as well as the standard. This is particularly onerous when all three documents -PAS100/QP and scheme rules apply. |  |
| Pg. 22 | G | There is no mention of weeds and invasive weeds. | Add to definition. |
| 4.5.3 | Training & competence | What is ongoing competence and what is expected from this? | Define or outline |
| 4.11.2 | Internal audit | Need to define level of training – there is no formal internal auditor training so what will be deemed to be adequate | Consider what constitutes appropriate auditing. |
| 5.1.1 | Input materials | It would be useful to have some definition of source segregation here as it would help remove the pressure to accept overly contaminated material | Define source segregation so that everyone is working to the same requirements. This would help EA enforcement feedstock input and send message to operators and level the playing field. |
| 11.5 | Independent sampling | Who will be classified as an independent sampler?  Would an independent sampler be an external consultant and what would happen if they were using that consultant for other work for the company  – would this then be deemed independent  It’s likely to accrue significant costs and not add a great deal to the process | Consider |
| Table 3 | Minimum compost quality- Stones | Good to see stones at 10mm – most agricultural applications are more than happy to accept this level and it can provide benefit in some cases – Composts that require less stones would be provided under an additional requirement clause |  |
| 14.4 Pg. 44 | Non- conforming material | In most cases it’s not practical to store material on site especially in summer through to autumn. There is also the issue of the time it takes for PTE results to come through. | Option 2 |