

Form for the submission of comments on PAS 110, *Specification for whole digestate, separated liquor and separated fibre derived from source-segregated biodegradable materials*

In order to make the compilation of comments as simple as possible, please submit them on the attached form, via email to: **bhavisha.patel@bsi-global.com**

The cut-off date for comments is **16th April 2008**.

It would be helpful if each comment made one point only, was clearly separated from the others and was structured as follows, in clause order:

- clause/sub-clause number;
- paragraph/table number;
- type of comment (general or technical);
- comment (with rationale behind the comment);
- proposed change.

Example comments (taken from a different standard for illustration purposes)

Clause/ subclause	Paragraph/ Table	Type of comment (General/Technical)	Comment (with rationale)	Proposed change
4.1.1	Note	General	The note is not needed because the manual will have a longer life than the information about improvements to the IT system.	Remove the note.
4.5.2	Micro breaks	Technical	It might be helpful to advise candidates taking a micro-break to look at a distant fixed point.	Add the following wording: Candidates should be advised to focus on a distant point during micro-breaks.

Thanks for your help.

Bhavisha Patel
BSI PAS 110 project manager

Project title: PAS 110:2008 Specification for whole digestate, separated liquor and separated fibre derived from the anaerobic digestion of source – segregated biodegradable materials	Draft no: Second draft 1.0
Commentator: Mark Foxall	Date: 7 th April 2008
Organisation: Local Authority Recycling Advisory Committee (LARAC)	(Cut-off date:) 16 th April 2008

Clause/ subclause	Paragraph/ Table	Type of comment (General/ technical/editorial)	Comment (with rationale)	Proposed change
3. Terms and definitions	(3.7) Biowaste definition	technical	The definition used is not suitably descriptive. Also the term 'discarded' should be broadened to include for those wastes deliberately set out (by households/commerce) for separate collection and treatment	It might be helpful to include examples of waste, for instance, food waste, garden waste etc.
3. Terms and definitions	(3.24)	editorial - Typo	digestiate	digestate
3. Terms and definitions	(3.69) Source segregated definition	technical	The definition used is incorrect. Source segregated means just that, segregated at the source. The definition as currently drafted infers that source segregated material cannot then be blended/combined with other wastes. Subsequent processing does not alter the source segregated status.	Redraft should include for waste segregated at source and then blended with other wastes for processing. For example garden waste might be source segregated and separately collected but subsequently blended with proportions of food waste to improve processability. Both wastes might still be source segregated.
6.	(6.2)	editorial	Current text - and used entirely used within the same premises or holding	Proposed text - and part used or entirely used within the same premises or holding
10.	Table 1	technical	Stones> 4mm current text suggests 5 minimum sample test result passes	Remove numeral 5 – not possible to achieve a pass or fail if no limit is set
10.	NOTE	editorial	Current text - that are used entirely used within the same premises or holding	Proposed text - that are part used or entirely used within the same premises or holding
14.	14.1.2	editorial - Typo	matierals	materials
Page 31	Table A.1	general	Maximum particle size - Should 6 cm be 6mm?	6mm (?)

Clause/ subclause	Paragraph/ Table	Type of comment (General/ technical/editorial)	Comment (with rationale)	Proposed change
COMMENTS				
E1			LARAC is not a regulator so shall not comment	
E2			Comment noted no reply necessary	
E3			LARAC is not a regulator so shall not comment	
E4			LARAC is not a regulator so shall not comment	
E5			LARAC is not a regulator so shall not comment	
E6			LARAC is not a regulator so shall not comment	
E7			LARAC is not a regulator so shall not comment	
E8			Not able to comment	
E9			Not able to comment	
E10			LARAC is not a regulator so shall not comment	
E11			LARAC is not a regulator so shall not comment	
E12			LARAC is not a regulator so shall not comment	
E13			Not able to comment	
E14			Unclear what this clause is trying to achieve. If the outside storage of PAS 110 tested/validated material is safe to humans, the environment, flora, fauna and not detrimental to the status or quality of the product it is unclear why the point of application or cost of storage should be a factor for determining PAS 110 status.	
E15			Not able to comment	
E16			Not able to comment	
E17			Stone content will inevitably cause wear and tear to equipment used in the application of digestate and so should be a consideration and be reported. The customer however will know how they intend to apply digestate and whether or not stone content and at what level this might cause a problem.	

Clause/ subclause	Paragraph/ Table	Type of comment (General/ technical/editorial)	Comment (with rationale)	Proposed change
COMMENTS CONTINUED				
E18			There is a need for these tests as there should be concern regarding the spread of particularly notifiable weeds	
E19			Not able to comment	
E20			Declare as part of typical characteristics - it should be up to the end user to determine whether the digestate remains fit for purpose based on the particle size	
E21			A – should be declared without limit, it should be up to the end user to determine whether the digestate remains fit for purpose based on the dry matter content	
E22			A reduced burden alternative is supported. Provisions should include that suitable quality assurance methods are documented and fully adopted. A programme of testing is still maintained. The source, nature, type, and quality of the feedstock remains consistent.	
E23			Not able to comment	
E24			Not able to comment	
E25			Same view as at E17	
E26			Not able to comment	
E27			Not able to comment	
E28			Same view as at E20	
E29			Same view as at E21	
E30			Same view as at E22	