

## Minutes for the CCS & BCS summer 2023 TAC

Tuesday 20<sup>th</sup> June 2023, Online

---

### Attendees

Stephen Nortcliff	Chair
Georgia Phetmanh	REAL
Thomas Aspray	REAL Technical Advisor
Emma Laws	REAL
Megan Muller-Girard	REAL Research Hub
Gregor Keenan	CCS Producers' Representative
Jo Chapman	BCS Operators' Representative
Roy Lawford	OF&G
Sophie Arguile	NSF
Fiona Donaldson	SEPA
Kathy Nicholls	EA
Alison McKinnie	Zero Waste Scotland
Sarah Pitcher	NRM

### Welcome and apologies

SN welcomed all attendees from the meeting. GP gave apologies from Nick Johnn, Gillian Manniex, Liz Cooper, Declan McManus, Aiden Gill, and Simon Thorpe, who were unable to attend the meeting.

### Minutes and actions from the last meeting

*GK to send AM the video on plastic contamination*

GK confirmed this had been actioned.

*GK, TAC, or REAL to consider asking AM to take action regarding sharing GK's video for discussion with local authorities and Scotland Excel (GP)*

GP explained that REAL discussed this action internally and TA had also discussed this with AM. In general, REAL and REA are looking to work together on this issue, and plastic contamination broadly will be discussed during the QP revisions. This issue of 2% contamination will be discussed with the trade associations and the EA, and REAL will be engaging with others in the industry and helping with these discussions. Otherwise, GP has been informed that this issue has also been discussed in the context of the 'organics road map'. To date, the LAs have been saying that there is not much they can do. During these discussions, there was an idea/plan to design a tender and contract template for LAs (to manage this in a standardised way) but it was felt that we can't tell the composting industry "you must use this and accept less than 1%

contamination”, and there would be difficulty working with third parties e.g., waste transfer stations winning contracts for 10% contamination (this is a commercial issue). If contracts specify 10% contamination is allowable, the 2% plastic limit impossible to achieve, let alone any tighter limits suggested under the QP revisions. Overall, this issue has been discussed on many platforms but the LAs don’t have money to pay for quality recycling and it’s difficult to find a solution, so discussions are open.

KN additionally gave feedback from discussions with local authorities, explaining that it was a difficult meeting and not much progress was made from the EA’s perspective.

AM asked if REAL would like AM to take action with GK’s video through Scotland Excel on behalf of the TAC or whether we would be happy for AM and GK to work together on this issue separately in Scotland.

**Action:** REAL to confirm to AM whether we would like AM to take action with GK’s contamination video with Scotland Excel or whether we are happy for AM and GK to work together on this separately

*REAL to consider comments from the TAC when drafting new section on attending PAS training courses for inclusion in the CCS and BCS Position on Technical Requirements*

GP confirmed this has been actioned and REAL will circulate the final draft version to all TAC members for final comments soon, along with various other draft positions we’ve been discussing with the CBs.

*REAL to consider gathering information on the source of molybdenum in the future*

TA confirmed that the decision has been made to keep molybdenum testing as optional, as it is a relevant element and that this may be taken further in future.

*REAL to consider feedback from JC on farm-based AD plants potentially not being aware of the pasteurisation exemptions and exemptions for co-operatives for the Why Not? Project or other*

EL explained that this has been noted for the Why Not? Project. The project has not been taken forward yet, due to other projects and workload. EL added that REAL will be discussing the project in REAL’s Q2 meeting this week. Additionally, REAL also have a new Communications Executive, who will likely be involved in this project so this should help with engaging people as this was the key issue faced by Molly last time.

*REAL Research Hub to consider comments from the TAC on potential contractors for the PRT project*

MMG informed that in the November 2022 TAC, Stephen suggested that the PRT project could be completed by a postgraduate student, and Tom noted the project was probably more appropriate for an MRes or PhD (rather than an MSc Student) given the expected duration of the project. REAL discussed this and are open to Masters and PhD students delivering RH projects. When putting the Project back out to tender last Autumn, MMG contacted several university professors to query whether they or any postgraduate students might be interested in the project. The Hub received little interest from students or professors about this project but REAL is open to the idea for future projects.

*REAL to consider feedback from NRM on producers (mainly BCS) not providing enough sample*

TA explained that SP had raised this issue at the November TAC. REAL later had a call with labs and sample size was discussed; it was not a common issue for BCS but most often occurred if there was a new sample taker or new operator. REAL sent a reminder to all operators of our sampling webinar and sampling guidance with sample size required.

NRM reported in January that things have improved.

*REAL to consider discussing with the EA the issue around some non-certified compost producers obtaining LA contracts with over 1% contamination and find out what the constraints are*

GP updated that this has been added as an agenda item for further discussion during REAL's annual meeting with the EA, but this meeting hasn't taken place yet. Otherwise, GK will share some feedback later today from the forum on this issue, as discussed with producers.

*REAL to consider comments from TAC members on requirements for use of the PAS mark, transition periods, and potentially assessing compliance on a case-by-case basis*

EL explained that GK's update at the November TAC included comments from producers on concerns about already printed bags, and the mark being required on the front of bag. There will be a transition period for these rules, and the wording was changed to "main face" to allow for bags where front/back may be an issue. The use of the mark is also to be optional.

*REAL to consider comments from the TAC on collecting information from producers on value/price*

EL confirmed that following TAC comments, REAL have made providing this information optional and added a note explaining REAL is aware of factors which cause price variation and that we are seeking an estimate/approximation.

*JC and TA to further discuss the VFA and RBP discrepancy issue during the BCS testing webinar, and JC to submit feedback following the BCS testing webinar re focussing on VFAs*

TA informed that this was actioned; JC and TA discussed this during a webinar. TA added that an update will be delivered later in the meeting.

*FD to circulate WRAP report on RBP and VFA work*

This was actioned by email following the last meeting.

*JC to consider raising VFA and RBP discrepancy issue at a future forum meeting for further discussion with operators on their experience, to identify if it was an isolated issue or wider scale*

JC explained that this was discussed again at the forum and the operator who raised it wasn't at the last forum, but no further specific experiences were raised.

*REAL to consider comments and advice from the TAC regarding mandatory or optional use of the CCS conformity mark and decide on requirements in the rules going forward*

EL confirmed that following TAC comments, use of the mark is to be optional.

*REAL to facilitate discussion with CBs and achieve consensus on when the use of the mark should not be given for compost producers supplying blended products re percentage of compost in the blend*

GP explained that REAL held this discussion with the CBs a while ago and later decided to remove the current guidance or allowance for use of the conformity mark on packaging or bags for blend products. This is for several reasons; there may be a loss of control and traceability if the mark is used on blend products, use of the mark showing a compost product is certified might be misleading, it is challenging for the CBs to determine what would be a suitable percentage of certified compost in a blend product for the mark to be used, and the CBs informed that they're not aware of any producers using the mark on blend products with only a small number on the scheme producing blend products. REAL are considering potentially developing a separate mark for blend products in the future, but this is still under discussion.

*REAL to consider comments and advice from the TAC on the minimum size of the conformity mark*

EL confirmed that the exclusion zone has been increased to 40 mm as per TAC comments.

*REAL to consider comments from the TAC on what to include in the risk assessment issued to the CBs for deciding on when to undertake a remote audit (if taken forward in the rules)*

GP informed that REAL considered all comments from the TAC before starting work on the risk assessment with the CBs and over several months, produced a version we were happy with, which included a set of questions categorised under 'changes' to the process, 'testing', 'product complaints', and 'non-conformances', which meant that a remote audit would only take place the following year after an on-site audit if the answers to these questions aren't Y/N and the operator falls in the 60% of operators with the lowest number of minor NCs. For example, if there were any product complaints raised with the operator which were upheld, the operator would have another physical audit the following year. This risk assessment proposal was presented to the regulators for discussion.

*REAL to consider comments from the TAC on introducing remote audits to the schemes*

GP confirmed that REAL considered comments from the TAC during our meeting in November last year before a proposal for remote audits was circulated to the environmental regulators for discussion. REAL then worked with the CBs to produce the risk assessment for remote audits, but as mentioned in the scheme developments summary paper, we removed all draft remote auditing requirements from the scheme rules before UKAS carries out a formal review of the scheme rules, as we haven't concluded discussions with the regulators. So, REAL will look to continue discussions outside of the scheme rules revision process, including at a joint meeting with the regulators we're planning to schedule in soon, with the aim to potentially introduce requirements during the next revision.

*REAL to move TAC spring catch-up from telecon to MS Teams*

GP confirmed this will be the case going forward.

*REAL to consider comments and feedback from TAC on whether the mixing and co-storage of product status digestates produced by two different processes on the same site by the same should be permissible*

*REAL to draft new section on mixing and co-storage of product status digestates for BCS Position document*

TA updated on both the above actions in one, explaining that this related to a query from an operator at beginning of year. TA met with KN to discuss this with her prior to the TAC call; a scheme position statement has been drafted and is currently being reviewed by the CBs.

SN asked if there were any questions on the above actions.

JC asked in relation to remote audits, as these are not being taken forward this time, what is the timescale for future review of the rules.

GP answered that REAL review the rules yearly, so a decision on remote audits will be made next year.

## CCS & BCS updates

EL first gave an update on scheme numbers: on CCS there were 176 Certified Processes, 138 in England, 20 in Scotland, 11 in Wales, 6 in Northern Ireland, and 1 in the Republic of Ireland. Collectively these were processing ~4.1 million tonnes of input per annum and producing ~1.9 million tonnes of output per annum. On BCS there were 107 Certified Processes, 79 in England, 13 in Scotland, 8 in Wales, and 7 in Northern Ireland. These were processing ~5.5 million tonnes of input per annum and producing ~4.6 million tonnes of output per annum.

EL then gave an update on a complaint REAL have received since the last meeting. The complaint form was received on 7th June. It related to topsoil claiming PAS 100 certification, which was extremely contaminated. The product does not seem to have been purchased from a CCS producer. An investigation is ongoing to establish if the product contains certified compost and if so, the source of the alleged certified compost.

SN queried if it was common that people claim PAS 100.

GP answered that it wasn't in REAL's experience.

GK commented that he has seen some websites claiming PAS 100 and he's been contacted sometimes when people claim it. They then ask him to supply to meet their orders.

AM asked if it is worth reminding producers that when they sell compost on, the people can't claim PAS 100.

GP responded that we are hoping to address this with the new Scheme Rules, as there will be a removal of the allowance for supply chain organisations (SCOs) to use the PAS 100 mark.

SA commented that, as she has spoken to GP about before, another way of thinking about the product being passed on is REAL could always go down a licensee route so they have to register with REAL. So you have traceability and at least you are aware of who is using mark.

GP confirmed REAL are looking at this, it is under consideration. We don't have an update for the TAC as yet, as this idea is being discussed further at the CCS/BCS Q2 meeting this week.

EL mentioned that in this case, the mark was not used; the website simply said BSI: PAS 100 under the product description, but we do not have further information and are trying to investigate further.

GK shared the link to the company mentioned previously [Organic Green Compost \(cpa-horticulture.co.uk\)](http://OrganicGreenCompost(cpa-horticulture.co.uk)).

**Action:** REAL to consider communicating to scheme participants that they can't allow third parties to make claims or use the conformity mark if supplying their compost to them.

**Action:** REAL to consider reaching out to retailers/third party companies making claims of certification or using the conformity mark following publication of the new CCS Scheme Rules, to request they remove claims/marks.

GP asked if there were any queries on the summary paper. There were no questions, but SN commented that the paper was valuable.

## Update on the Research Hub

MMG delivered the following update on the Research Hub:

As always, want to begin by issuing a reminder that the outputs of the Hub's first two projects—the Organics Recycling Research Library and the Digestate Data Pack and Valorisation report—remain available on request. And to request, just get in touch with me at the email address on screen.

MMG then shared progress on current projects:

*Evaluation of the potential for the improvement of the Residual Biogas Potential test and investigation of alternative test procedures for PAS110 biofertilisers (BCS)*

Final stages of work—Aqua Enviro has delivered the last chapters of research, currently under review and expect the final report to be completed shortly.

*Evaluate possible alternative area-based methods of assessment for plastics (CCS and BCS)*

A contractor has been appointed to deliver the project; we expect to make an announcement about this appointment shortly.

*How the benefits of applying compost and digestate to soils can be accounted for under the Greenhouse Gas (GHG) Protocol (CCS and BCS)*

AECOM has been appointed to deliver this project and recently begun on the first stages of work.

*Plant Response Test Interpretation and Comparison: Investigating performance of the PAS-Specified Tomato Plant Response Test and Spring Barley Test on Quality Compost (CCS)*

A brief update was given on the project in the Scheme Developments paper from the perspective of the PRT TWG, as the group submitted the proposal to the Hub for consideration.

Picking up on this update from the RH perspective, the project was put out to tender in 2021 and received no bids so was revised in 2022 and received no bids. After these two attempts to attract tenders via the standard Research Hub procedure, REAL proposed to take the project forward through a different avenue.

This will involve the development of a Project Specification which will outline the project design including objectives, methodologies, and outputs. The spec will be developed over the coming months with input from REAL's Plant Response Test Technical Working Group and potentially CCS approved

labs. REAL then expects to tender for an external project manager whose role will be to ensure the project is delivered to REAL's Specification. Once a contractor has been appointed to manage delivery, the Research Hub will manage the project from REAL's side as normal.

Finally, MMG updated on the 2023 Project Selection Process. 6 proposals were received this year – SN who in addition to being the TAC chair is the RH technical advisor and works on the proposals each year has said this is the best group of proposals received yet. We won't go into the details of each now, but will pop in the chat a link to a document that summarises the proposals if anyone's interested [research\\_proposal\\_summary\\_paper\\_2023.pdf \(realresearchhub.org.uk\)](https://realresearchhub.org.uk/research_proposal_summary_paper_2023.pdf).

The first panel meeting was held in early June where four proposals were shortlisted and will now move forward to the next round of evaluation in July when the panel will decide which project(s) to put forward for funding.

SN commented that in his opinion, the projects were the best in terms of quality. However, one of the concerns the Hub has is the need to get producers involved, in submitting and responding to the survey. The Panel takes considerable interest in how producers respond to these proposals, but we didn't have much response, so it was taken into account but not as much weight was given to the results.

MMG agreed and thanked SN for mentioning this, adding that the Hub has tried to include producers, but to date has had very little engagement at both stages for involvement. But the Hub are open to any suggestions.

## Update from the Certification Bodies

SN informed that Nick John from ACL was unavailable for the meeting. Then asked SA for her update on NSF.

SA informed that they have one suspended site at present and are in discussions with NRW and REAL on this, as the site was suspended following a visit and complaint from NRW.

SN then asked RL for an update on OF&G.

Roy detailed that OF&G have had no complaints since the last meeting. A third new CO has almost finished training, and some inspectors have returned.

JT asked SA for her availability to discuss NRW's complaint further.

## Update from the Approved Laboratories

SP updated that changes to request forms and reporting templates are in progress, to allow for reporting against SEPA limits, as well as some other changes/updates. Additionally, the labs have noted some issues with peat supplies, but it is not universal.

SN commented that there is one Hub proposal related to alternatives to peat for the PRT, which has been shortlisted for the next round.



## Update from the CCS Producers' Representative

GK reported that he had a couple of updates to share from the last forum. Firstly, there was discussion around permits and the max. 1% contamination level, and issues with local authority contracts because of this. There is a concern regarding the commercial aspect; sites know LAs can't comply, so they miss out on contracts. Other producers are bidding for the same contracts without permit limits, meaning it is not a fair playing field. There is a want for LAs to be more accountable.

SN commented that this is an ongoing dilemma, he does not know how we get round it.

KN commented that bespoke permits are getting 1% put on them too, when people can't meet it, they need to pick it out.

GK asked if across the board, 1% will be the level.

KN confirmed that yes, with tighter QP limits incoming, she has said to Mat [Davis] the deployments can't have more plastics than under the QP. The EA need to keep pushing this or we are never going to get anywhere.

GK commented that for deployments, producers just need to sample; there are fewer hoops to jump through than certification.

KN informed that the EA have employed more land and water colleagues to inspect deployment. The EA want deployments to allow quality to land, they are not a backdoor disposal route. Appropriate measures need to be agreed with the LAs to ensure quality in the front end. Also, as householders think all they throw away goes to landfill anyway, they aren't motivated to improve quality. Some LAs send out information to householders, and this has been successful; the link to food production is particularly important. Defra are squeamish about the EA doing a public information campaign, but it is necessary.

SN commented that he has seen bins showing the lifecycle of waste in one place near to him, which he felt was beneficial.

KN commented that there is the hub of LAs around the Oxfordshire area who are not taking any advice.

SA informed that she has seen some really good initiatives that are site-led, where they've brought school kids onto site to show them how it all goes through etc. and they've seen results. Education and outreach do get results.

KN suggested that locally, one producer she knows is supplying people with topsoil and compost. Householders now believe it is being recycled.

GK explained that he sees 2 types of contamination; someone who puts peelings in a plastic bag but then they put it in co-mingled. They are trying but have got it wrong. Other stuff such as toasters, laptops, duvets are just being flung in a bin somewhere. The only solution is for collectors to not lift that bin.

KN commented that she would like to reassure producers that the EA have taken more measures, and they are working to improve this.

GK then continued with the summary of the forum:



REAL had asked for feedback on remote audits; all forum attendees gave positive feedback bar time spent scanning docs potentially being an issue. There was then a session on compostables; producers gave the feedback that they don't like them, GK alone was the site that actually takes them and has no problem. Producers don't feel they break down sufficiently and any remaining compostables detected in the PC&S test are regarded as a contaminant. Also materials that are described as compostable (bags, wooden cutlery, etc.) often do not appear to be fully compostable. Additionally, producers raised the public perception issue of compostables spread on lawn looking like plastic.

SN commented that he had seen a report about compostable bags in the ocean. They found a bag that had been at the bottom of the sea for over a year and had shown no breakdown.

KN agreed that the UCL home composting study is showing this as well. The delays in single waste feed collection is down to debates around packaging. KN additionally suggested there is a question on the labelling; many say biodegradable, e.g., dog poo bags, which are not compostable.

AMK shared this study relating to degrading of compostables: <https://www.packaging-gateway.com/news/study-biodegradation-compostable-bioplastics/>.

## Update from the BCS Operators' Representative

JC explained that there was a similar session on compostables at the BCS Forum; operators commented that feedstocks are de-packaged anyway so compostables are not going through the process.

There was the usual small group of attendees at the forum, but there were some new people attending which is positive. JC commented that the new chair is working out nicely, and she felt the forum was another good meeting.

JC then explained this key issue that came up before and during meeting: one operator had raised with JC before the forum that they were looking to install a new finer screen, anticipating that the revised QP will have a tighter PC limits. Their CB informed them that this is a significant change to the process and so they will have to revalidate. This operator asked JC to raise this at the forum and then the TAC on their behalf for discussion, particularly around whether it is possible to reduce the time between samples to revalidate and would they then have to test all parameters, as this change is only impacting PCs. JC queried that as the producer is making a positive change, and others are likely to do so given the QP revision, should the process be this difficult.

RL explained as the standard is written, there is no halfway house; if there is a significant change you have to revalidate. This operator was given the option of using their initial validation or hydraulic retention time as the time between samples. RL added that this is only a problem at this site, as they only have 600m<sup>3</sup> of storage; they cannot store the digestate while waiting for test results. Other sites would be able to store the digestate and then release once revalidation was achieved. RL explained that this is a significant change as the screen is a critical control point for PCs.

JC commented that in terms of working around revalidation, it seems to me there is flexibility regarding the portion of production for parameters impacted. Particularly given the technical note that if screening to less than 2mm, operators don't need to test PCs more than once. JC agreed that storage has made it more of an issue in this case.

SA added that she understands the frustration from the operator, but the CBs when looking at the standard have to take it at face value. A significant change requires revalidation. Other than looking at

rewording of the standard in future, nothing can be done on this occasion. Nick, Roy, and myself, are all in agreement.

RL agreed – the CBs discussed this at length and there would need to be a change to the standard for them to do a 'half validation'.

JC queried what RL meant by half a validation.

RL explained that as they only have 600m<sup>3</sup> of storage, their HRT would have to be a tenth of normal. They also said they would not do all parameters.

JC responded that she understands the CBs' comments about it being a significant change. However, from her view, the portion of production for revalidation is not set in stone.

RL explained that they can do HRT or 6000m<sup>3</sup>, and asked where JC was reading from, as he could not find this under revalidation.

JC answered she is looking at definition of portion of production; the wording of 10.6 leaves things open so long as formally documented within QMS.

SN commented that having gone through information from JC and the standard before the meeting, he found a real dilemma as what the operator wants to do is good, but he did not have a flexible interpretation of the standard. Under the current rules, we cannot find point of flexibility on this.

JC explained that before the meeting she had sent SN a summary of the issue which she will send to GP to share with the actions/minutes.

SN asked if there were any other comments on this issue.

AMK raised that, to take it a step back, this is yet another producer with not enough storage. If they then have to revalidate something else it will be an issue again. Producers not building enough storage is a real issue.

RL agreed – the same situation would/will happen if they have a failure.

TA added the particular screen size JC is talking about here is very small, and queried if operators are using it already and what is the impact on what comes out?

JC answered that they proposed to do a trial to evaluate this, but it was almost irrelevant as it was a significant change. This operator is using something similar at a different site, but she was not sure on the size.

TA commented that it seems there is the opportunity to do a trial before validating, on output material maybe, not on the process itself to avoid the need to revalidate for the trial.

JC asked finally so she can feedback to operator, what are the outcomes from today?

SN summarised that we are with the CBs at the moment, as we can't see any alternative pathway, and RL's comment about storage is critical in this case.

GP added that REAL's next step is to draft a position with the CBs, which will go into the technical requirements document, but will seek final comments from the TAC.

**Action:** JC to send summary of screening issue to GP to consider including in or with the minutes

**Action:** JC to feedback to operator that the issue has been discussed and agreed, commenting on storage aspect

**Action:** REAL to circulate draft position on the screening issue to the TAC for final comments

## Technical issues

### Use of VFA analysis as an early indicator test for RBP failure

TA explained that this came from a query at the BCS forum on whether VFA can be used as an indicator for the RBP test, i.e., if the VFA is very low but the RBP fails, should the lab check for issues with the RBP result.

TA then detailed the background on the VFA; it was proposed in WRAP's 2010 RBP protocol report, and a correlation was suggested. VFA testing was then included in PAS 110. Then in 2013, WRAP published a RBP Review report which concluded that there are no grounds for using VFA concentration as a product stability criterion. The 2010 report which found correlation between VFA and RBP used a small number of datapoints (19) and converted VFA on a COD basis. The R squared shows correlation but there were lots of anomaly points.

TA then presented the results of REAL's analysis using test results from the REAL database. There were 156 samples using data from January to September 2022, and including only liquid samples (WD and SL). This analysis backed up WRAP's 2013 report conclusion that VFA is an indicator of process not product stability. Individual operators may find correlation at their own site, and so may still be able to use VFA as an indicator of digestate stability. High VFA samples are maybe less reproducible in the RBP test (WRAP, 2010) – adjust I:S ratio from 2:1 to 4:1 in RBP test setup.

TA commented that he had not been able to find the final version of the 2013 WRAP report and asked if anyone had access.

SN confirmed that he could not find the report when he had looked, and also commented that he and JC are meeting with MMG on the Hub RBP project on Thursday. He recalls similarly things not being clear cut in this relationship in the Hub project findings.

**Action:** TAC to share final version of WRAP 2013 RBP review report with TA

## AOB

### Update on QP revisions

EL gave the update that scoping exercises to define objectives of the risk assessment have taken place or are currently being worked on. Within this scoping exercise, REAL (with REA and ADBA) held a webinar to discuss proposed changes to acceptable feedstocks and circulated a paper for consultation. Responses on acceptable inputs from the webinar were taken to the Task and Finish Group for discussion at the end of April. Separate working groups have also been set up for comparators and quality standards.

The risk assessment work will then begin within the next few months. The EA is still aiming for end of this year for the revision process to be completed and the new resources frameworks to come into place. REAL is trying to help this be delivered on time.

SN commented that three of the research project proposals received by the Hub this year relate to the QP revision.

JC raised a query on the timeframe if the work is likely to have been completed by the end of the year.

KN explained that the hold-up is really on the risk assessment – to complete this is going to take forever and a day. We have addressed some issues in JRC and WRAP risk assessments by removing some aspects and rewording some parts. Data just isn't there to complete gaps in original risk assessments. So, we accept there are risks we need to work on still, and then build on risk assessment data. Things like PFAs there is just no data. The FPRs should be addressing those risks not the QP. Therefore, the Task and Finish Group have QPs out, reviewed and published, some risks addressed and some known unknowns, by the end of the year, knowing we will research and address at unknowns later date.

## Actions

- REAL to confirm to AM whether we would like AM to take action with GK's contamination video with Scotland Excel or whether we are happy for AM and GK to work together on this separately
- REAL to consider communicating to scheme participants that they can't allow third parties to make claims or use the conformity mark if supplying their compost to them
- REAL to consider reaching out to retailers/third party companies making claims of certification or using the conformity mark following publication of the new CCS Scheme Rules, to request they remove claims/marks
- JC to send summary of screening issue to GP to consider including in or with the minutes
- JC to feedback to operator that the issue has been discussed and agreed, commenting on storage aspect
- REAL to circulate draft position on the screening issue to the TAC for final comments
- TAC to share final version of WRAP 2013 RBP review report with TA