



## Product Complaint Investigation Report Form

### Record of complaint:

Date of the complaint reported	25th October 2017
Date of the investigation commencement	First contact with farmer - 30 <sup>th</sup> October 2017
Date of the investigation complete	8 <sup>th</sup> December 2017 (Summary Note sent to REAL)
The complaint was made by	██

**Nature of complaint:** Please could you briefly describe the nature of the complaint and specify which quality aspect(s) the complainant was concerned about?

- An advisor local to the farm ordered 500 tonnes of PAS 100 0 - 20 mm grade compost from a farm purchasing group.
- The farm purchasing group had bought the product from another supplier . The supplier to the purchasing group had bought the product directly from the producer.
- The Batch Code purchased was █████
- A contractor commenced applying the compost and was unhappy with the levels of plastic and metal contamination and ceased application
- Around 300 tonnes of compost remained on farm
- The CB auditor telephoned the farmer and requested the remaining 300 tonnes of product be held on farm in order they could examine it. This request was denied as the farmer wanted it off the property . The product was collected by the producer

**Actions:** What actions were taken to investigate the complaint?

**3<sup>rd</sup> November : The CB auditor completed an investigative audit of the producer**

- The audit found :
  - The remainder of batch █████ that had been collected from █████ had already been reprocessed
  - Input records for batch █████, no issues
  - Batch █████ was 10mm sales at 608.68 tonnes, 20mm sales at 1077.85 tonnes
  - No other complaints were received by the producer regarding this batch.
  - A PAS100 full suite test record for batch █████ - Passed all parameters.
  - Stock piled product on site showed no issues - these included batches █████ and █████

**16<sup>th</sup> November : At the request of REAL, the Environment Agency were informed of the issue**

**24<sup>th</sup> November : At the request of REAL, the CB auditor completed an investigative visit at the complainants farm where the compost was spread**

- The farm adviser confirmed that he had purchased compost from the producer previously but only at the 10 mm grade for use on other land.

- The CB auditor visited the field where the product was spread - the grass was around 1 foot high so difficult to establish contamination levels.
- The CB auditor went to the area where the product had been stored and there was less than a tonne scattered near wall edges
- The auditor scraped up a sample from the small quantity of remaining compost at one of the stockpile sites. There was not enough left to get a representative sample of the batch.
- The sample was sent for testing – it failed on the plastic parameter.

**Outcomes:** What were the outcomes of this investigation (Please state whether the certificate was suspended, temporarily suspended, or withdrawn)

**The CB concluded :**

- They were unable to prove beyond all doubt that the batch ■■■ was not produced to PAS 100 specification
- That scraping together a small sample from bits remaining was more than likely not representative of the batch
- The best evidence that was available was the 300 tonne remaining and this evidence was removed from the farm before the CB auditor could get there to view it. The CB auditor regularly inspects large quantities of this grade when completing audits and would have been better placed to make a judgement on its compliance with a visual inspection .
- 20 mm product was used by the farm - for grassland application a 10mm grade might have been a better choice

**The producers certificate was not suspended**

**Lessons learned:**

Please note if there is anything that the industry could learn from to avoid similar incidents in the future.

**Auditing:**

- The CB recommend that REAL review their auditing frequencies, perhaps two a year may be more robust with the one looking at procedures and the second an unannounced spot check to look at the product quality.
- The CB recommend that REAL may like to look at even more than two audits each year for higher risk members - the risk could be based on product testing performance
- Investigative Audits (Complaints ) - The CB recommended that REAL look at these and the costing / payments for them - Is it fair the producer has to pay if no evidence / it cant be proved they produced a not to specification product

**Product Testing :**

- The CB recommended to REAL that they consider a different system for product testing – producers currently take their own samples for testing

**Customer Complaints:**

- The CB recommended that REAL write into their rules that is a producer receives a complaint about their

product, they must notify their CB immediately AND they must hold onto the offending product – it must not be reworked