

CCS SCHEME RULES V.7 CONSULTATION RESPONSES - JUNE 2014

Clause, page, table, annex	Comment	REAL Comment (justification for change)	Proposed change	Accepted / Rejected
4.2.5	This information is not required. The CB would not be able to audit this.	The scheme rules should not place additional requirements beyond the standards.	Remove	Accepted
12.10	UKAS accredited labs to be used	REAL is drafting Terms & Conditions for the lab and consider whether the UKAS accreditation should be required. This hasn't been decided yet but it is unlikely due to high cost of accreditation.	n/a	Rejected
Certification milestone	It is type of renewal model is one that is being phased out and updated within other schemes. They can only be issued against their current grade or scope- so if for example on renewal you were aware their grade was changing you would be unable to provide a certificate on this until after the audit.	The CBs propose that the current certification milestones remain- these could be reviewed again at the end of the year. But we are in agreement that we would not like to make any changes prior to this.	Remain the current certification milestones unchanged	Accepted
General	Remove all wording relating to EN45011- this will be replaced & only applies to the Certification Body	This requirement is already in the CQP and does not need to be repeated in the Scheme rules.	Remove any reference to EN45011 in the Scheme rules	Accepted
4.2.11	Should be 'following approval' rather than 'prior to approval'.	no comment	Change to 'following approval'	Accepted
6.2.3	'An invoice shall be issued on receipt of payment'. Surely an invoice is sent before payment?	This clause was removed from the new version.	Change to 'before payment'	Accepted
12 - 4.	Should be 'composter' rather than 'person'	no comment	Change to 'composter'	Accepted
14	Lists that REAL are responsible for appointing, managing etc of CBs and labs but no mention of Independent Samplers	no comment	Add Independent samplers	Accepted
15.2.1	delete as unnecessary	no comment	Remove	Accepted
15.2.3	delete as unnecessary	no comment	Remove	Accepted
16.2.1	delete as unnecessary	no comment	Remove	Accepted
15.2.2	I was under the impression that the cost of independent sampling was collected by REAL through the capitation CBs pay. If so the statement here is misleading	The cost of the independent sampling taking is covered by REAL.	Change text to: The cost of the independent sampling taking is covered by REAL.	Accepted
16.5.1.4	Does this mean the CBs have to consult the TAC in each case? The paragraph is confusing	no comment	Remove	Accepted
16.7.1	this is not connected to the title above - i.e. visual assessment	no comment	Remove	Accepted
General	Input Material Supplier agreement templates – nice idea , but I think it is unlikely all composters will be able to get suppliers to sign agreements.	The scheme rules should not place additional requirements beyond the standards.	Remove	Accepted
PTE failures	Re testing for PTE failures – positive move.	no comment	n/a	Accepted
Visual assessment	Compost batch visual assessments – positive move	no comment	n/a	Accepted
Compost bags	Compost bags – As I understand this – the following would be acceptable. I could send off site a pallet of bagged compost , the bags could be blank with no information on them, all I would need to do would be to ensure a separate documents containing info went with consignment.	no comment	n/a	Accepted
16.1.6	Appears to suggest that the compost producer shall include all the elements from the ORG template. Whilst we use a similar format (not in as much detail as being suggested) within our legally binding form of contract with the end user are operators expected to reformat this at their own cost to meet this requirement.	The scheme rules should not place additional requirements beyond the standards.	Remove	Accepted
16.6.2	Suggests that in the event the PTE test results are more than 10% above the upper limit the failed batch cannot undergo re-composting even with the addition of further added material. This not only has financial implications but also disruption to the operation and its service levels when dealing with the failed batches	The scheme rules should not place additional requirements beyond the standards.	Remove	Accepted
16.7.2	It refers to each batch having a visual assessment carried out for weed seeds, physical contamination and stones and the results are recorded. At the moment this is carried out but not recorded, so this will be an administrative burden. With the weed seeds, I wonder about the practicalities of spotting these in screened compost. So are we introducing tighter measures that could be neglected by operators	This is not an additional record requirement. The information can be kept in the batch appraisal record sheet.	Clarify the clause.	Rejected
16.9.1	Under "B" PAS100 only, it suggests that the bag wording needs to include our phone number and then "if you are unsatisfied then call REA" Not sure if this just relates to non-CQP compost or both standards. Assuming it is both, this will just add further costs to an already tight margin in a hugely competitive market where sales of bagged compost are low. Also, it still seems to be stating that if bagged compost is to be applied to grazing land then it needs to include the info in 25.3 (this is quite a long list of the requirements of the ABP regs). We remember having an email conversation with Kiara some time back as we thought putting this info on the bags would be prohibitive as it would scare people unnecessarily. The response was in agreement with us and with the animal health, if the bags are less than 50kg then ABP info does not need to be included and if it is more than 50kg some ABP info does need to be included but in an abbreviated version. It would be good to have this clarification included in the new rules.	The scheme rules should not place additional requirements beyond the standards.	Remove	Accepted
General	General comment, why does the document refer to "his/her" and "he/she" perhaps this needs to be reworded	no comment	Replace with the composter or they	Accepted
16.1.6	This is not practical in cases where small landscapers deliver green waste on an ad-hoc basis and in particular, cash customers who may only use the site once a year. Any customer delivering to our sites are given a waste acceptance criteria sheet showing what can and can't be brought to site. I think for local authorities and contractors acting on their behalf should have an input materials supplier agreement but not small customers	The input specification agreement was developed with Local Authorities contracts in mind and it should apply to only LA contracts.	Review the clause to reflect the comment.	Accepted
16.3.1	Can I suggest that EWC codes are specified here as "rock dust" is not clear enough. Would this allow products such as recycled stonewool (EWC 02 01 99) from the horticultural market be acceptable in this circumstance?	It was just an example.	Remove the example	Rejected
Def: Re-grading	Justyna – have you had confirmation from the EA that this is acceptable? It seems to contradict Section 1.3.1 of the CQP, and a clear statement from the regulators could reassure your members on this point. Apologies if I have missed it elsewhere	The wording of this definition was approved by the environmental regulators.	n/a	Accepted
4.2.3	'every produced batch for which conformance is claimed'?	The intention was to each batch should be produced following the operational & management requirement of PAS100, CQP & the Scheme rules and not only for which conformance is claimed.	n/a	Rejected
4.2.5 A	'new feedstocks'?	no comment	n/a	Rejected
4.2.5 B	'Recirculated feedstocks (such as oversize from previous batches)'	no comment	n/a	Rejected
4.2.11	Justyna – how does this relate to certification? Eg If a PAS producer wishes to accept non-Appendix B inputs for more than one batch, is their certificate suspended?	Yes, that is the case.	n/a	Accepted
10.1.1	Would a composter be likely to do this, or would they prefer to complain to the scheme owners and have you pass on the complaint to the CB?	REAL has decided the the CB should be the first point of contact (thinking of the CB's Independent Panel).	n/a	Rejected

11.4	Has there been any consideration of combining this into a 'CCS certified' logo? In other words, the scheme will only accredit to end of waste in Scotland, Wales, England and NI according to country-specific requirements?	REAL have not consider this and PAS100 brand seems to be much stronger then CCS. We may consider the change in the future.	n/a	Rejected
14.5	Might be worth adding a link to these T&Cs here	no comment	Add link to the CCS web site	Accepted
16.1.6	Should this be more generic ('co-collected source-segregated biodegradable wastes?')	no comment	Change to co-collected source-segregated biodegradable wastes'	Accepted
16.5.1.1	Of the PAS or these scheme rules?	no comment	Remove reference to the Scheme Rules	Accepted
16.6.5	Why do these not form part of the scheme rules? Referring folk elsewhere may mean they don't read the other guidance	It is a guidance on PAS100 interpretation.	n/a	Rejected
16.7.2	I removed weed seeds, as you'd never see them – but you might see bits of weed root / stem	no comment	Remove weed seeds.	Accepted
16.7.2	For this to work, it would help if each site developed an SOP for visual checks. I'm also unsure whether your intention is that any sample failing a visual inspection is deemed to have failed PAS100. I think that what you're trying to ensure is that producers inspect the finished product and (subjectively) consider whether or not it meets the PAS (or customer-specific) criteria for PCs, weed propagules and stones. If it doesn't then some actual testing might be sensible prior to despatch	The composter should follow the HACCP approach; so either implement corrective action & check the efficacy of it or test the batch prior to the positive release.	n/a	Rejected
16.8 NOTE	As with my previous comment – this seems fine to me, but are the EA/SEPA etc on board? If so, a note to confirm this might be helpful	The Scheme rules were thoroughly checked by the enviromental regulators: The EA & SEPA.	n/a	Rejected
General	Expiried certificates	The grace period should be removed from the certification milestones with no exceptions subject to the composter provision of evidence that an investigation has been carried out. The certificate should be issues prior to receiveing all the required test results. Whether the composter will supply the relevant test results to the CB as soon as received. If this shows further failure on the relevant parameters the certificate could be suspended.	Remove the graze period from the certification milestones	Accepted
General	Samples transportation should be a requiemint - Samples must be delivered in a cool box which must keep the sample at 4 to 5°C and in dark, to minimise any changes in sample characteristics over transit. The laboratory must check upon receipt of the sample that the compost sample has been transported in the correct conditions and within the maximum specified timescales . If samples are not delivered in the correct conditions or have not been sent by the composter within the correct timescales, the laboratory shall notify the producer that the samples do not comply with the scheme requirements and therefore the test results will not be valid for certification purposes	REAL believes that this should be a recommendation.	n/a	Rejected
6	Removing the certification milestones from the Scheme rules	REAL was advised by the decision taken at the TAC meeting to remove the certification milestones from the Scheme ruels.	Remove	Accepted
General	PTEs failure & resampling clauses to be removed	The scheme rules should not place additional requirements beyond the standards.	Remove	Accepted