



## Summary Notes from the joint meeting of the Technical Advisory Committee for the Biofertiliser Certification Scheme and Compost Certification Scheme

**Thursday 10<sup>th</sup> June 2021**

Online

**Chair:** Stephen Nortcliff

### **Attendees:**

Georgia Phetmanh	REAL
Molly Rogers	REAL
Thomas Aspray	REAL
Jo Chapman	BCS Operators' Representative
Gregor Keenan	CCS Producers' Representative
Roy Lawford	OF&G
Sophie Arguile	NSF
Nicholas Johnn	ACL
Sarah Pitcher	Laboratories' Representative
Alison McKinnie	ZWS
Fiona Donaldson	SEPA
Simon Thorpe	Red Tractor
Janet Gascoigne	UKAS
Stephen Brockhurst	UKAS
Kathy Nicholls	EA

## **1. Welcome and Introduction**

SN welcomed all to the TAC.

## **2. Minutes and Actions from the last meeting**

REAL presented updates on actions from the last meeting (Oct. 2020) and telecon (Mar. 2021).

- *REAL and NRM to discuss inaccurate comments made by the laboratory regarding PRT results*

TA reported that an internal discussion was held after the October TAC meeting. REAL is now putting together an information sheet that will be relevant for the customer services team at the laboratories. It will help to ensure information given to producers is correct and consistent. All the labs were in agreement that this would be useful, and it will be issued soon.

- *REAL to consider rolling out sampling webinars for Red Tractor (and possibly Soil Association)*

REAL had an internal discussion about this and considered that the webinars were too focused at producers. REAL is discussing this with Red Tractor to identify what their training needs are.

- *REAL to ensure T&C's satisfy requirements of ISO 17025*

This action arose as the last T&C's revision process was completing. It will be looked at again during the next review and there will be a focus on what can be considered to uphold this standard.

- *REAL to circulate details on co-storage of product status digestate to all four regulators and Janet*

Following the October TAC meeting, REAL circulated the details of this query to all four environmental regulators and UKAS. REAL have since added a scheme position on this in the BCS Position on Technical Requirements. The draft has been circulated to the CBs for comments. The full amended document will then be circulated to the TAC before it is published.

- *REAL to circulate QA scheme rules proposal to all four regulators for comments*

GP reported that this was circulated to the regulators, but the discussions had not concluded. A revised proposal was presented to the regulators at the annual liaison meetings and discussions will continue outside the scheme rules revision process.

- *RL and JT to further discuss product complaint related to a bund in Wales*

RL reported that JT emailed to ask for more details over the history of the site. Certificates and compliance notices were sent. This has been signed off by the CB as the issue lies with the regulator.

- *REAL to consider re-sampling in event of delayed courier for the CCS Sampling Guidance*

TA noted that couriers have always been an issue in relation to testing on both schemes. Though REAL made an amendment to the CCS sampling guidance before the end of 2020 and this was approved by the TAC. The details around transit time were removed and timing requirements for starting of tests were relaxed to effectively manage this.

- *REAL and SN to discuss attendance at the next CCS and BCS producer forums*

This action was discussed between SN and OF. REAL hopes that SN will attend the winter producer forum meetings in advance of the next Research Hub proposal submission period (in 2022). SN will help operators to generate research ideas in the next call for proposals.

- *REAL and UKAS to discuss multi-site sampling*

GP reported that the details of the hub and satellite site were sent to UKAS, and JG provided a guidance document related to this for consideration. An update was provided at the last TAC teleconference and the updated position has been circulated to all the CB's.

- *REAL to record field bean query discussion in notes for the next PRT TWG meeting*

This action was completed.

- *JC to encourage the operator representative experiencing issues with RBP inoculum inhibition to engage with REAL*

JC encouraged them to attend the forum. SN commented that he would be having a conversation with JC in the coming days on the research proposal submitted to the Hub.

- *REAL to consider suggestions and ideas from TAC for the Why Not? Project*

These suggestions have been considered and recorded. REAL have also had further discussions with the regulators. The discussions have been recorded to continue the Why Not? Project in future.

- *EA and SEPA to provide comments to REAL about PRT TWG research project proposal*

This action was completed.

- *REAL to consider views from TAC on PT schemes for scheme-specific tests*

GP noted that an update from this action would be provided later in the meeting.

- *KN to provide REAL with contacts for BEIS and Defra to consider approaching them re the RBP test*

This action is ongoing.

- *REAL and EA to discuss third-party compost supplier issue at annual liaison meeting*

This action was discussed in April and an update will be given later in the meeting.

- *REAL to add third-party compost supplier issue to next meeting agenda*

This action was completed and will be covered during this meeting.

### **3. CCS & BCS Updates:**

#### **a) Scheme Updates**

MR reported that as of June 2021, there were 177 certified composting processes. 140 in England, 19 in Scotland, 12 in Wales, and 6 in Northern Ireland. There is approximately 3.86 MT per annum of inputs processed and 1.78 MT per annum of quality compost produced. Since the start of 2021, there have been five applicants to the CCS, 0 suspended certificates, and seven withdrawn.

On the BCS, there are 98 certified AD plants. 73 in England, 12 in Scotland, 7 in Wales, and 6 in Northern Ireland. There is approximately 5.11 MT per annum of input processed. Since the start of 2021, there have been 10 applicants, 0 suspended certificates, and 3 withdrawn certificates.

TAC members had no questions on the summary paper, which was circulated ahead of the meeting.

#### **Liaison and Roundtable Meetings**

REAL met with NRW, SEPA, and the EA in March and April. There were brief updates/discussions on the QP reviews and REAL sought further views on specific scheme developments e.g., the development of 'QA' certification, and scheme projects e.g., the Why Not? Project. Since the liaison meetings, there has been further discussions with the EA on third-party compost suppliers.

REAL also met with all the CBs and auditors in April. The roundtable meeting provided an opportunity to engage with new CCS and BCS auditors and detailed updates were provided on issues e.g., invalid RBP results and Hub & Satellite models. During this meeting, REAL sought feedback on various issues e.g., interaction between the QPs and waste permitting.

#### **SQCS Workshops**

REAL received positive feedback from the previous two SQCS workshops and held two more in April and May 2021. Four SQCS workshops for producers have now been held in total.

Producers have fed back that the workshops have been interesting and a great way to refresh their knowledge on the changes to HACCP requirements in PAS 100. REAL hopes that the workshops will contribute to ensuring producers keep their HACCP plans up to date.

REAL has also disseminated a guidance document to all attendees, which provides an indication of what is expected for compliance with the SQCS requirements of PAS 100.

#### **PT Programme**

REAL considered feedback from the TAC telecon during an internal meeting and have decided to wait until the QP reviews develop further, before proceeding to develop a programme.

Views were sought from scheme participants during the recent forums but at both meetings, there were no specific parameters that producers felt should be prioritised for a PT programme.

There was further discussion with the laboratories during the annual liaison meeting on 8<sup>th</sup> June. One laboratory fed back that focussing on compost stability may be beneficial.

REAL will draft a plan for development of a proficiency testing mechanism for specific scheme tests and monitor the QPs revision process.

**ACTION: REAL to develop roadmap for development of PT scheme/round robin testing for scheme tests**

Audits during the Covid-19 Pandemic

For initial audits in England, Wales & Scotland, remote audits may only take place if there has been prior notification and approval from the regulator. In Northern Ireland, remote audits can take place, but all must be followed up with an on-site/physical spot inspection.

SA noted that there has been a problem making sure this information goes to the right people in the agency. There was an audit which was delayed as NSF were not aware of the right people to ask for permission. JG commented that it seems unusual to need approval to conduct remote audits. The CB should complete a risk assessment, or the scheme owner should be part of this and there should be criteria which is set out by each nation. JG asked for clarification on this approach.

FD commented that SEPA prefer physical audits to take place, but they accept that the situation is changing and that for some situations a remote audit is the only option. SEPA would like to be made aware. RL noted that OF&G inspectors must complete a self-risk assessment before audits. When the pandemic started, several inspectors could not attend sites due to various reasons. NJ added that ACL are now endeavouring to undertake all site-based audits going forwards.

In Wales, Scotland & NI, remote audits may take place where necessary until 31<sup>st</sup> July 2021. In England, the agreement was extended from 31<sup>st</sup> May to 30<sup>th</sup> September 2021 with additional caveats/conditions. On-site audits are presumed but if it is not possible due to e.g., area restrictions, a remote audit may take place and the CB will document the reason for choosing a remote audit. Additionally, a second remote renewal audit must be avoided but if this is not possible then the reasoning will be given by the CB to the local EA officer.

All operators have been updated and the next review meeting is taking place in mid-July.

**b) Update on the MDWG**

The MDWG met in May and agenda items included an update on the QP reviews, compost use for animal bedding, and compost oversize. The QP reviews were discussed in depth during the meeting. The REA representative confirmed that they planned to hold workshops on the QP reviews, which took place the day before and the day of the TAC meeting.

Engagement with the growing media sector was further discussed, and the group are considering the introduction of a disclaimer in supply documentation that clarifies the intended use of the product, which is agreed with the purchaser.

Compost oversize was kept on the agenda to revisit in future meetings, but the MDWG considered that it is not the right time to push this, as the Environment Agency's end of waste panel was closed. JC highlighted that the panel is opening again soon.

GP noted that the QP workshops were being recorded and can be viewed afterwards. JG attended the CQP workshop with mainly producers and they worked through the technical issues.

**ACTION: REAL to request recording of QP workshops from REA and circulate to TAC members if possible**

**ACTION: REAL MDWG to take into account that the EA's definition of waste panel opening end of July**

**ACTION: REAL to consider sharing key points from MDWG meetings if minutes cannot be circulated**

### c) Update on the Research Hub

MR reported that the first project of the Research Hub was live and open for users. The project (Research Library) was launched, as scheduled, on Tuesday 26<sup>th</sup> January 2021. As of 10 May 2020, the Research Hub had received 42 'Request Access' submissions. The Research Hub was in the process of developing a '*Access Request submitted to the Research Hub's Research Library*' paper, which details the cost of access to the library for non-CCS/BCS participants.

NNFCC and Vital (the website developer and host) will maintain the Research Library for a period of at least one year post-launch. The content of the Research library is being reviewed by NNFCC on a quarterly basis, to routinely identify and link new research into the Research Library. Furthermore, to monitor use of and traffic through the site, user statistics are being reviewed and reported upon quarterly. An annual review of functionality will also be conducted prior to the anniversary of the launch, to discuss areas for further development, future focus and specific improvements required to address user feedback with the constant aim of optimising the user experience. The Research Hub website has been updated with information and details in relation to the first project.

SN reported that some journals are not able to be accessed as they require a login or to be paid for.

**ACTION: MR to feed back SN's comments on accessing reports in the Research Library to OF**

The second project is titled 'To develop a 'data pack' on the properties, characteristics, and content of digestate that will provide context for the development of new uses of outputs from Anaerobic Digesters'. Following a competitive tender process, Solidsense Ltd have been contracted to carry out the work. Solidsense are subcontracting AquaEnviro and Cambridge Eco Ltd to carry out specific elements of the project. The work is underway and will be completed in November 2021.

A call for research ideas was announced on 11<sup>th</sup> January and ran for six weeks. Five Research Project Proposals were submitted in total, from both operators and the wider industry. SN, Advisor to REAL, liaised with the submitters of the project proposals to obtain additional details where necessary. A SurveyMonkey was live at the time of the Forum and was circulated to CCS/BCS operators, to gauge their opinions and collect scores on the submitted research ideas. The Research Panel met on 26<sup>th</sup> May to evaluate and shortlist the research ideas, considering the SurveyMonkey results, and will meet again in July to select at least one project to be taken forward for commissioning.

SN reported that following the May Research Panel meeting, three proposals are to be taken forward for the second evaluation meeting in July.

#### d) Update from the Certification Bodies

SA reported that NSF received one complaint in March regarding the levels of physical contaminants in compost. This had been purchased through a third party and the complainant also had concerns over the claim of 'organic' status. They conducted a spot check on site which did not uncover any issues, the product was clean, and the process was well managed. NSF closed the complaint as it was not valid. It was hard to tell if the contamination had come from the site or the third-party supplier.

SA noted that this was a grey area where the compost had been taken from site and mixed before it was passed to the end user. The third party were advertising this as 'organic' and PAS 100 but this was not the case. This is an example where the producer does not have any control once it leaves the site. FD noted that SEPA was very happy with the way this complaint was dealt with by the CB. SN commented that when he was in B&Q, he could not find on any of the bags any reference to how the products were produced or if they were produced by a certified site.

NJ reported that there were no complaints for CCS or BCS but there were a few resource issues which were being dealt with currently. AM raised an issue where liquid fertiliser was making cows sick – is this digestate? ST found it difficult to determine what the product was as it was just referred to as a liquid fertiliser, but it was confirmed that this was not PAS digestate.

RL reported that OF&G had three open complaints. The first was in Hertfordshire and from a local EA officer reporting that the compost had high plastic levels. There was a spot inspection at the site, and the results came back showing there were high plastic levels. The producer took more samples and will send them off. The second was in Dorset where a local EA officer reported that a farmer was complaining about plastic. There was a spot inspection and there was clear contamination in the pile. The course grade was certified but the certificate was withdrawn.

**ACTION: REAL and OF&G to investigate why a certificate suspended by OF&G had not appeared in the monthly report**

#### e) Update from the Approved Laboratories

SP reported that there were no issues with the labs. There are usual problems with couriers and samples from Northern Ireland are taking 48 hours rather than 24 hours to arrive at the laboratory. Though these are booked on a 24 service and often take 48 hours.

#### f) Update from the CCS Producers' Representative

GK reported that at the CCS Forum, there were a few issues/topics raised.

Firstly, there was discussion around test result interpretation and webinars. Producers are always looking for guidance on retests and what actions are acceptable in the event of test failures. He questioned if auditors judge this on a case-by-case basis or are provided with guidance? REAL does not issue guidance directly to the CB's. SA informed auditors look at whether the investigations are logical, and producers have carried out analysis on the cause of failures and prevent re-occurrence.

In terms of the plant response test, the 4% failure rate was shared by REAL and this figure, if taken in isolation, looks low. However, producers commented that a single failure for a site is a significant problem, due to the time holding batches and the length of time of the test.

GK questioned if there are size recommendations or minimum sizes for logos on bagged compost, as this can be very small and does not help to promote the scheme.

**ACTION: REAL to review sizing guidelines/rules for use of CCS conformity mark on bagged products**

**ACTION: REAL MDWG to consider guidelines/rules for use of conformity mark on bagged products**

Additionally, there was a comment from one producer who asked why there is a PRT for CCS and not BCS. They were looking for an explanation on the differences between the two products and asked why one requires a growth trial and the other does not, as the assumed end market is agriculture.

TAC members questioned if it would be possible to capture the total tonnage dispatched to each end market under the scheme.

**ACTION: REAL to investigate whether it is possible to capture total tonnage dispatched to each market**

The issue of third-party reselling was raised. GK noted that the auditory focus is on the dispatch note, and if a producer sells a product with a dispatch note, there cannot be any conformity claims unless it is part of the audited process. If the third party is not part of the auditing process but is claiming the product is PAS 100 certified, the control has been lost. Once you have agreed the end use with the customer, there is nothing more that can be done.

Another discussion at the forum was around compostable packaging, where GK noted that the key problem with compostable packaging is identification. Litter pickers cannot easily identify compostable plastic. AM noted that she had this on her radar and was working with the policy team at ZWS on this, as well as looking at false advertising. Very little products are actually composted and if consumers are told that you can put packaging in with the food waste, this is very confusing. Compostability is something that is misleading for consumers.

A consultant who represents producers reported that they had a failure for a PTE in January. They contacted the lab to check the results. The lab came back and confirmed that there was an error, and they produced a new result for them. Another producer had this problem at the same time with the same element. GK asked if the lab finds an error, would they check all the other samples and inform producers that this error had happened? SP commented that there is a sample re check process and part of this looks at other samples that can be affected and they let producers know. There should be a procedure in place as this is a requirement under UKAS.

Another discussion at the forum was around PTE testing. Producers were interested in knowing what the likelihood of small amounts of physical contaminants triggering a spike would be. SP informed that the sample is homogenised, dried and ground. In theory, it is possible that a speck of a contaminant might pass through this process unmixed but there have been developments at great lengths to homogenise samples. Producers need to be assured that the tests are robust and be honest about their process rather than conclude there is a problem about the test. If the results of the samples have been reported and the samples have changed in nature, with PTE's there should be something identifiable and there would be a greater amount available.

**ACTION: REAL to consider whether re-testing the original samples at the producer's expense is acceptable for 'stable' minimum quality parameters e.g., PTEs**

A potato farmer at the forum raised an issue with the stones threshold limit being 4mm. He noted that this is not a problem for farmers and stones that might damage equipment are the farmer's personal limit. KN commented that there are two elements at play; issues for the end market and ensuring producers do not continually have problems with stones. If the limit were doubled it would make more sense for agriculture but if the product were supplied to growing media, the limit should be tighter. Mat Davis would comment on land quality and land price on this issue.

GK also informed that producers at the forum suggested that REAL's cost comparison should be updated to take into account all costs associated with certification e.g., litter pickers on site. REAL noted this as an action to address from the forum meeting.

**g) Update from the BCS Operators' Representative**

JC reported that there was a small group at the BCS Forum, but there were some new faces present.

The first issue that was raised was in relation to an operator from a larger plant with a lengthy hydraulic retention time informing that the requirement to analyse digestate every 6000cm means that they are doing frequent tests on the same batch (or portion of production). These comments at the forum were recorded for the next PAS 110 revision.

JC also noted that the cost comparison analysis comments from operators at the BCS Forum were similar to those at the CCS Forum. One operator flagged a similar issue that GK mentioned, that the certification costs are not fully representative and there are additional costs for PAS 110 producers over and above the costs factored in.

Finally, since the last BCS Forum there have been more operators who have experienced issues with non-response on the RBP test. One operator submitted three samples to the lab that produced no gas. Once operators engage with what no response means, there is a delay before there is understanding about what is going on. There has been a delay with getting messages across to operators and there should be further consideration for sites sending their own inoculum to the lab.

## **4. Technical Issues**

**a) Third-party compost suppliers**

REAL sought advice from the TAC on this topic and GP noted that there are several issues to consider when discussing third party suppliers;

- Traceability – it is challenging to investigate and address a product complaint when compost is sold to third-party companies – there are limits to the actions the scheme can take.
- Labelling – is not always clear and it is sometimes unknown if the PAS 100-certified compost is mixed before it is sold on (or whether the bagged product contains certified compost).
- It is outside scheme remit to take action directly with third-party companies – the QP sets the boundaries of the scheme and there is no control over the material once it has left site.

REAL held a meeting with the EA to discuss this and there was agreement that this will require co-operation and collaboration. REAL will share details with the EA when the scheme is unable to

effectively investigate a product complaint and additional details will be shared with the EA on the previous complaints. There were also discussions with the MDWG on planning how to promote compost in the growing media industry, taking into consideration this issue.

GP noted that there are boundaries to the Scheme and its reputation must be protected. REAL had considered whether producers could impose T&C's on the suppliers to ensure an effective audit trail from site to company. There needs to be an effective audit trail from producer to middle customer, but concerns were raised by the CBs over how this could be checked or followed up.

RL commented that from the CB's view, if there is a complaint relating to the scheme, it should relate to the person that holds the certificate. Once a product leaves an organic farm and if it is sold to a third party, there is no control over that. There should be no reference to PAS on the product and it should not be classed as certified material.

GK noted that he is not aware of how frequently this occurs, but he has personally been approached 10 times by people wanting to bag and sell his product which he originally thought was a good idea. However, once it is sold in bulk it could be mixed with all sorts of things. One aspect to be considered by the MDWG to protect producers is a disclaimer e.g., not for sale with the PAS 100 certification mark. There is a concern if customers complain about the product, and it is outside the audit trail. A large part of conformity is about how it has been made. If this product has been mixed with a waste, then it should revert to waste status and should be dealt with under waste controls.

JG commented that if this is not something that can be policed with the CB's, then it is not in the remit of the certification scheme. Producers cannot do much more than labelling the product (look at labelling rules) and educate people to look at labelling rules and have a disclaimer which says this is not a product if it is mixed. This would involve a lot more work and the scheme should not appear to cover something when it does not.

JC noted that other certification schemes operate so that a producer of a food material will certify under one category, but if there is a third party that third party must be certified and audited. There might be room for some additional certification.

**ACTION: REAL to consider advice from TAC on addressing third-party compost supplier issue**

**ACTION: REAL to feed back to MDWG comments raised during discussion on third-party compost suppliers**

**b) RBP test inoculum inhibition**

TA reported that in 2020, there were two certified sites reporting issues to REAL on RBP testing, and one site undergoing validation.

In 2021, there are four new sites and three different certified sites reporting issues to REAL. Additionally, the two sites from 2020 continued to need support. REAL reviewed the results and gave the sites approval to send their own inoculum, which remains in place. Using a stable site inoculum has now been demonstrated to reduce inhibition for two different sites. Based on provided lab data, 65% of inhibiting samples have ammonium concentrations above 4000 mg/kg.

Parallel site inoculum and lab standard inoculum testing is viewed by REAL as a temporary 'fix'

The options for moving forwards with this are:

1. Use of site inoculum alongside lab inoculum for sites with problem (i.e., continue with 'fix').  
The operator incurs additional testing costs.
2. Use of site inoculum in place of lab inoculum for sites with problem. Acceptance of site inoculum for RBP test. Is this a deviation from test method? The method states: "*mesophilic anaerobic digester treating municipal wastewater biosolids*".
3. Remove 'municipal wastewater' inoculum restriction for labs. Unknown issues.
4. The QC requirement is overridden where sample inoculum positive and stable. How would one assess once the sample has reached stable state? Would this make the test longer? Not all inhibiting samples with the standard lab inoculum become positive for biogas production.

REAL sought views from the TAC on these options and asked if there were any further ideas.

SN informed that during the RP meeting, a method specified in the EU fertiliser regulations relating to oxygen uptake was mentioned as an alternative to the PAS 110 procedure. He attempted to trace back why the particular inoculum was chosen. There should be justification as to why this was the chosen material. Allowing site inoculum is a reasonable approach but this is his personal view.

KN noted that she was not involved with the Residual Biogas test in the last PAS revision but was aware that this became quite a task. In view of emissions and storage, the EA looks at the rate of emission lost from open lagoons. When there are lots of corn-starch bags that end up in lagoons, a producer experienced changes in biogas potential and failures. She noted that it would be interesting to see if this has been flagged by anyone else, which might have the potential to change the test result. Feedstocks into AD will be investigated and there are a few issues.

The research project put forward has objectives around this but is not about pass or fail, it is about whether the test works. JC considers the second option presented is appropriate and fair. SP agreed with JC, from the laboratory point of view, the second option is appropriate, and the inoculum is effective. It seems pointless to run tests in parallel and it might be necessary to establish this route going forwards. There was general consensus on second option preference.

NJ questioned if this was an issue for only sites with novel feedstocks, and if there are exceptions for sites that use new feedstocks.

**ACTION: REAL to consider advice from TAC on short/medium term solution to addressing RBP inoculum inhibition issue**

**ACTION: REAL to look into whether sites experiencing inhibition issues are using novel feedstocks**

## 5. AOB

ST informed that there is a team in Scotland carrying out a compost trial on potato cyst nematodes. They would like to understand why the product has been produced according to PAS but cannot be certified. Allergens were looked at and it was concluded this was low risk, but ST was interested to know if the TAC had any thoughts on this.

WRAP looked at shellfish and allergens in compost and digestate. This comes up as being low risk, and it is not an issue. Once the trials are over the company wants to make their own compost and

achieve PAS for this. The reason it cannot be certified at present is because it is shellfish derived, which is not permitted. However, the QP is not used in the same way in Scotland and shellfish is classed as biodegradable. GK commented that for shellfish, ABP regulations need to be considered.

The trial will not be under PAS, as in order to conduct the trial, it is out of the regime of the plant that is processing according to the specification. This product is not going through the clamps with feedstock in the same way and is not representative of what they normally do. The compost will be produced separately to the main process and that is why it cannot be certified.

If they produce it to PAS as normal it would be easy, but the site does not know whether it will compost at the normal ratios. A potential stumbling block is availability of the right material to produce compost and enough land depending on the application rate and from the allergen perspective, demonstrating the absence of risk is trickier.

## **END**

## **ACTIONS**

- REAL to develop roadmap for development of PT scheme/round robin testing for scheme tests
- REAL to request recording of QP workshops from REA and circulate to TAC members if possible
- REAL MDWG to take into account that the EA's definition of waste panel opening end of July
- REAL to consider sharing key points from MDWG meetings if minutes cannot be circulated
- MR to feed back SN's comments on accessing reports in the Research Library to OF
- REAL and OF&G to investigate why a certificate suspended by OF&G had not appeared in the monthly report
- REAL to review sizing guidelines/rules for use of CCS conformity mark on bagged products
- REAL MDWG to consider guidelines/rules for use of conformity mark on bagged products
- REAL to investigate whether it is possible to capture total tonnage dispatched to each market
- REAL to consider whether re-testing the original samples at the producer's expense is acceptable for 'stable' minimum quality parameters e.g. PTEs
- REAL to consider advice from TAC on addressing third-party compost supplier issue
- REAL to feed back to MDWG comments raised during discussion on third-party compost suppliers
- REAL to consider advice from TAC on short/medium term solution to addressing RBP inoculum inhibition issue
- REAL to look into whether sites experiencing inhibition issues are using novel feedstocks