



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

Wednesday 28th October 2020

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
Eugene Kelly	NIEA
Simon Thorpe	Red Tractor
Janet Gascoigne	UKAS

1. Welcome and apologies

SN welcomed everyone to the virtual meeting.

2. Minutes and actions from the last meeting

REAL to consider update to CCS Position document for 'hub and satellite' model sites

- REAL drafted an update to section 9 of the CCS Position on Technical Requirements document to introduce sampling requirements for hub and satellite model sites. There was a new subsection drafted and this was circulated to the CBs for comments. The agenda for the meeting included time to seek advice later in the afternoon on this issue.

GP and JG to further discuss the 'Quality Assurance' category of certification

- During the last TAC meeting, the 'Quality Assurance' category was presented as the BCS and CCS 'Quality Assurance Schemes'. GP clarified this certification category was introduced in 2019 with the revision of the BCS and CCS Scheme rules. JG had highlighted that it sounded as if they were separate schemes from the CCS/BCS. This certification category is no longer being referred to as the BCS/CCS Quality Assurance Scheme(s), but GP informed that REAL would like to seek advice from the TAC on this later in the meeting.

REAL to consider comms and notice period for withdrawal of agreement re COVID-19

- The Covid-19 renewal audit agreement between REAL and the environmental regulators in place with a review date of 31st July was extended until 31st December for Wales and 31st January 2021 for England, NI, and Scotland. This extension was communicated to all operators last month and GP provided an update on this during the scheme updates.

REAL to address complaint regarding 'Compost Direct'

- OF&G had emailed 'Compost Direct' to request they remove logos from their website if any supplier was not PAS 100 certified. However, the description for the 'black gold' product still contained reference to PAS 100. REAL emailed to ask where this compost came from. Compost Direct stated all compost is PAS 100 certified and provided the name of a large waste management company with many sites on the scheme, but no specific names or details. At the time of the meeting, REAL was still chasing to identify the site the batch came from.

REAL to consider comms for announcement of Environment Agency initial QP reviews

- The review outcome(s) has not been published but REAL will circulate the outcome(s) to all scheme participants by email when published. The winter newsletters will also be circulated before the end of the year and include an update on the QP reviews.

REAL to consider providing more information to BCS participants about tests

- REAL considered that the most effective means of achieving this will be through webinars. REAL will roll out the 'understanding test results' webinar for BCS participants next year as for CCS this year. MR provided an update on the trial webinar for CCS later in the meeting.

SP to report to GK on recent weather associated PRT emergence issue

- SP reported that there was a comment at the last TAC meeting regarding weather issues, but there was no evidence to back this up. The test is restarted if it looks like there will be poor emergence. The problem with the test was not related to the weather, but the laboratory decided to repeat the test to be sure the result was valid. The comment was made by NRM staff, but after investigating, it was not concluded that it was not weather related.

ACTION: REAL and NRM to discuss inaccurate comments made regarding PRT results

3. Scheme updates

- **Scheme status**

MR reported that as of October 2020, on the CCS there were 178 certified processes (140 in England, 20 in Scotland, 12 in Wales, and 6 in Northern Ireland). There was approximately 3.84 MT of input materials processed annually and 1.92 MT per annum of quality compost produced. On the BCS, there were 90 certified processes (65 in England, 1 in Scotland, 9 in Wales, and 5 in Northern Ireland) and approx. 4.98 MT of input materials processed annually. Since the beginning of 2020, there have been 8 applicants to the CCS, 2 suspended certificates, and 6 withdrawn certificates. There have been 12 applicants to the BCS, 0 suspended certificates, and 2 withdrawn certificates.

- **Summary paper**

GP circulated a summary paper in advance of the meeting which included information and updates on the 2019 annual report, BCS sampling guidance, and RBP position statement. There were also updates included on the CCS and BCS Scheme Rules revision, MDWG, PRT TWG, workshops and webinars, the scheme databases, and the BCS certification body tender.

There were no questions from meeting attendees on the update paper.

- **CCS Sampling Webinars**

This year, REAL have run four CCS sampling webinars: three for producers and one for CBs / CB personnel. Producers are encouraged to attend the free webinars which are 45 – 60 mins long, as they provide a platform for discussion. The content is kept up to date. The webinars have been well received and feedback includes that they are a good and time-efficient method for updating producers on rules and processes. There is an opportunity for producers to comment on further suggestions for the sampling webinars (using the feedback form). The webinars have been valuable in improving engagement between producers and REAL, in addition to the fora held twice a year.

GK raised an issue that was brought up at the CCS forum, where one producer thought the slides of the webinar would be shared. TA explained that this was misreported by him and the slides will not be distributed. Producers are encouraged to attend the webinar.

ST queried if REAL had considered inviting non-producers to these webinars and if they would be able to participate in the webinars. TA and MR noted this for consideration.

ACTION: REAL to consider rolling out sampling webinars for Red Tractor

- [‘Understanding Test Results’ Webinar \(Trial\)](#)

REAL have recently developed a new webinar, ‘Understanding Test Results’, for all producers under the CCS. The webinar delivers information on the core PAS 100 test methods. By gaining a better understanding of the methods, and how they are executed in the laboratories, REAL hopes this will help producers better interpret results they receive. The webinar also provides a platform for discussion on this topic. A trial webinar was held on August 20th, where past attendees of the CCS Sampling Webinar were invited to attend and provide feedback before the webinar was rolled out more widely. REAL received positive feedback and it helped inform the direction of the first ‘Understanding Test Results’ Webinar, which was held on Friday 6th November.

- [SQCS Workshops](#)

REAL held two workshops for producers in August and September on the Safety and Quality Control System (SQCS) requirements in PAS 100:2018. The SQCS workshops provided a platform for discussion around the implementation of the SQCS and compliance with HACCP requirements. The workshops were held by REAL and delivered online by a HACCP expert. The half-day workshops were comprised of interactive sessions and individual exercises. Producers have provided feedback to REAL that the workshops were very useful and provided a lot of opportunity for discussion.

- [Covid-19 and Audits](#)

Following discussion with the regulators and the CBs in September, REAL has communicated to all operators that both remote and on-site/physical inspections will continue for annual audits. This position took into consideration the increase in COVID-19 threat level, the rise in cases of local lockdowns, and recent Government advice for people to work from home. Remote audits remain a robust temporary approach, as no further issues have been brought to attention. On-site inspections are taking place where possible, following a COVID risk assessment, where the auditor and operator can comply with government guidance. Remote inspections take place where the auditor or site cannot comply with government guidance, there are local or national lockdowns in place, or there are issues with staff affecting their ability to carry out a physical audit. REAL has agreed a second extension to the agreement with the regulators, which allows for a temporary change in the Scheme Rules.

AM queried if this position was for recertification audits or initial audits, as she reported that a site was still waiting for an audit to be able to become certified. GP clarified that for initial audits, if it takes place remotely, the applicant site is required to be visited and subject to an on-site spot check when it is safe and possible. AM informed she would get in touch with this site and push for a remote audit.

- [Laboratory Approval](#)

All laboratories and sub-contractors have now been audited for 2020. The audit reports have been circulated with advisory notes and there have been several recommendations made to the laboratories and REAL. REAL will be discussing the outcome of the audits and then involve the CBs before the laboratories are reappointed according to a new set of T&C’s.

JG queried if the Open University was carrying out the audits in accordance with the requirements of ISO 17025. TA clarified that these audits were in accordance with the REAL Laboratory T&C’s. There are a number of tests that the laboratories are required to hold UKAS accreditation for, but some of the methods are scheme specific. JG advised that when the CBs are UKAS accredited, ISO 17065 refers to tests being carried out in accordance with requirements of 17025, so the closer the alignment to

these standards, the easier it will be for the CBs. GP informed that the Laboratory T&C's are currently undergoing revision and the CBs are involved in this consultation under the LAS.

ACTION: REAL to ensure T&C's satisfy requirements of ISO 17025

- [PT Programme EOI](#)

TA reported that there are interested parties, but currently there is not enough information from the responses to the Expressions of Interest (EOI) document. Further technical and financial information is needed for REAL to decide on opening a tender process.

- [Revision of the Scheme Rules](#)

Version 8 of the CCS Scheme Rules and Version 5 of the BCS Rules were reviewed and new draft versions 6 and 9 were issued for consultation on 14th August 2020. The key change can be found in section 4.2 in relation to the 'Quality Assurance' category of certification. Other changes have also been introduced (e.g., use of the term 'participants' in place of 'members') and minor updates (e.g., update from 'Oversight Panel' to 'TAC'). The new draft versions were issued for consultation to all scheme participants, TAC members, CB, and laboratory personnel, with a response deadline of 25th September. All consultation submissions have been collated and reviewed.

REAL would like to seek advice from the TAC on specific issues and consultation responses.

[Storage of digestate and clause 4.2.1](#)

There was a previous query raised on whether it is possible to mix and co-store digestates with product status produced by two different producers in the same lagoon and for it to retain product status. Clause considered: *'Operators may obtain certification for a defined anaerobic digestion process and digestates resulting from that process (provided that both the process and digestates are kept separate from any wastes kept, and other processes carried out at the same site).'*

Consultation response: "We had a discussion on this clause earlier this year relating to the storage of digestate from different certified processes in a shared lagoon at a site remote from both AD sites. There was a lack of clarity if this is permitted or if this clause prevents it..."

JT commented that unless specified in the QP, it might not impact on its status as waste material, but the detail within the QP would need to be assessed. From a first glance, regulators did not see an issue with mixing two digestates in their own storage tank, but if the digestate had two different levels of nitrogen, this would need to be sampled to get the right application rate. If the product is stored off-site, it would be classed as a waste. PAS status kicks in when the material is supplied to the end user but if the storage is intermediate, there needs to be more consideration. Members of the TAC agreed that more clarification was needed before a decision was taken on this.

ACTION: REAL to circulate details on co-storage to all four regulators and Janet

[Point of Use / Clause 4.1.1](#)

Consultation response: "Not sure about the wording around 'point of use'. If a customer buys compost and then temporarily stores it prior to use, it is not normally considered still to be waste. Could change

the wording to 'at the point of supply to a customer'?" REAL agreed with the comment and considers that the compost becomes a product at the point of supply but sought advice from the TAC.

TAC members agreed that the producer does not have control once the material is sold and has left the site. For SN, the point of supply is when it becomes a product, as there is no way to find out what the customer will do with the product once it has been supplied to them. The product can come with instructions, but it would be impossible to certify a product when it is out of control of the producer.

JC noted that there is a requirement under BCS that when a producer supplies a product, they provide terms of use, a full account of what the intended end use is, and the consequence of mixing the material with waste. GK commented that composters produce all year round, but they might have an agreement with a farmer to take a batch sooner than needed before they plan to plough. In cases like these, there are legitimate and practical reasons for why it is supplied before its intended use.

Definitions and Terms

In the revised drafts, the definition for 'Standard' has been introduced (e.g., for PAS 100), and the definition of 'Protocol' has been introduced (e.g., for the CQP). Consultation response: "PAS100 being defined as 'the standard' doesn't work. The QP and Scheme Rules are also standards. It made more sense when PAS100 was named throughout."

SN uses PAS 100 rather than 'standard'. Standard should be used when it has a specific standard meaning such as BS, EN, or ISO. It is difficult to use this term in the context of PAS 100. TAC members agreed that the QP is an end of waste framework, the Scheme Rules are Scheme Rules, and PAS is a 'specification' but not a 'standard'. This should be changed to 'specification' or referred to as the document name 'PAS 100' or 'PAS 110'.

Quality Assurance Category

The revised draft of the Scheme Rules state 'only operators producing compost/digestate that are not subject to waste regulatory controls may apply for certification in this category'. A BCS consultation response suggested a rewording of the sentence for clarity and a CCS response queried whether this option was only available to producers of compost whose materials were not waste derived.

The aim for the QA category is to be available to producers of compost/digestate that are not subject to waste regulatory controls but may be waste-derived (e.g., manure and crop fed digestate spread to land), but REAL sought advice from the TAC on this matter.

JC commented that if this category is restricted to only digestate derived from non-waste feedstock, REAL would be losing a target audience that would benefit the most from this form of certification. Though JT warned that REAL must be careful when specifying, as the statements that allow outputs to go to land not under regulatory control are policy position statements, not an interpretation of the law. This category needs consideration, as there are variations that need to be thought about. However, the benefits of certification need to be kept in mind and considered for this category.

ACTION: REAL to circulate QA scheme rules proposal to all four regulators for comments

Procedures on Test Failures

REAL received a consultation proposing more in the Scheme Rules on procedures when there is a test failure and the responsibilities for notifying and investigating test failures.

The requirements for operators in the event of a test failure are specified in PAS 100 and PAS 110. Though the new proposed requirements in the Scheme Rules specify a timeframe of two working days for the operator to notify the regulator and their CB.

GK queried what producers would be expected to notify the regulator of, and why, as if the site received a failure and the product had not been dispatched, this would not be an issue. These proposed requirements only apply to the BCS and not the CCS.

RL noted that the CB's are notified of test failures when the reports are uploaded to the database, so do not need to be notified separately. Though for the regulators, SN commented that this notification must be auditable, and therefore, an email or letter to the regulator is essential.

4. Update on the PRT TWG

The Plant Response Test Technical Working Group (PRT TWG) has been set up as a sub-group to the CCS TAC, to provide a platform for further discussion on specific issues that producers experience with the plant response test specified in PAS 100:2018. The group will report back to the TAC. The PRT TWG members have been confirmed and the first meeting took place on 8th September 2020. Agenda items included an overview of the test method and agreeing the Terms of Reference. The attendees of the first meeting of the PRT were REAL staff, two producer representatives, two EA representatives, and two SEPA representatives. Outcomes of the first meeting included REAL revising/adding to the aim(s) of the ToR and circulating for comments, which has been actioned. There will be a catch-up teleconference in November and the next face-to-face meeting will take place early next year.

The TAC agreed that this was a good, considered way to discuss this issue and consider all viewpoints.

5. Update on the Research Hub

The first project of the Hub officially kickstarted in June 2020 and the project remains on track for completion in January of '21. Fortnightly meetings between REAL and NNFC have been held to provide an update on project development and to monitor project progress, as well as monthly team meetings between NNFC/Vital/REAL. NNFC will provide a report to REAL summarising the findings of the Gap Analysis during November '20. A static version of the digital library has been showcased to REAL and data gathered during the Literature Review is currently being transferred into the platform.

The second project selected for commissioning is titled *'To develop a 'data pack' on the properties, characteristics, and content of digestate that will provide the context for the development of new uses of outputs from Anaerobic Digesters'*. A Project Management Team (PMT) was established for the second project of the Hub. The PMT have drafted a Project Brief and a Tender Invitation Document, which are now in the public domain. The tender process has been initiated and the deadline for tender submissions was Friday 2nd October. The first Tender Evaluation Meeting has taken place, the tender process is due to conclude, and a contractor for the second project be appointed by November '20.

The Research Hub website was launched in August, and the first Annual Report of the Hub was circulated to operators and industry at the beginning of September. The Research Project Selection Process has been revised and the new process will be implemented from 2021.

SN suggested to attend producer fora meetings and explain the Research Hub aims. He would highlight what the projects are trying to do and explain that brief ideas can be sent to him and he would work through details of the research proposals with producers.

6. Update from the Certification Bodies

OF&G

RL reported that there are currently 0 BCS complaints and three open CCS complaints. One complaint relates to a compost producer in Wales where a local resident complained about a bund being formed from shredded waste. They had permission to build the bund and NRW were aware of this. OF&G carried out a spot inspection, and the site was due an inspection a few days after by NRW. JT asked if permission is inferred, is it an exemption or authorisation? RL clarified that the site had permission from NRW, but the exact wording could not be confirmed at the time. This was challenged by JT.

ACTION: RL and JT to further discuss product complaint related to a bund in Wales

Another complaint came from an airport whereby there was plastic blowing on another farmer's field. RL confirmed the site would be spot checked on the day of the TAC meeting. The third complaint related to a third-party supplier. The compost producer was informed of this complaint and claimed that it was not their compost, but that this material came from an NSF site. NSF investigated this but were informed of the opposite. OF&G will carry out a spot inspection of this site.

NSF

SA provided an update following RL that the only compost complaint since the last meeting was the same as OF&G's. Since this, there has been follow-up, but the third-party company has pointed back to the other site (OF&G). NSF were assessing the next best steps and how to return to the complainant.

SA reported a digestate complaint which was picked up in an audit report. The complaint was related to plastic contamination, but the product had not been spread yet. It was recirculated and tested, then there was positive release of the product.

ACL

NJ reported no complaints on either BCS or CCS.

7. Update from the Approved Laboratories

SP reported that the laboratories are continuing to operate the best they can. NRM have seen a few changes in shift patterns for social distancing measures and impact due to track and trace. There have been issues with the couriers whereby there are missed pickups and samples are stuck at the hub overnight. Additionally, there have been problems meeting the overnight delivery deadlines, as this service has been outsourced. REAL were aware of this issue, which was raised at forum meetings, as operators were concerned about this. REAL are reviewing the scheme documents in relation to testing start times (Laboratory T&C's and sampling guidance documents).

8. Update from the CCS Producers' Representative

GK reported that the PT scheme, webinars, and the PRT TWG were discussed at the Forum. Producers would like REAL to contact other producers to query why they have left the scheme. He reported that the PRT was discussed and suggested changes to the test were talked through. Producers are going to discuss this further following the forum and gather ideas for GK to take to the TWG.

Producers were made aware of the RH proposal call and GK commented it would be helpful if SN could attend the forum and be contacted after to make proposals more detailed.

ACTION: REAL and SN to discuss attendance at the next CCS and BCS producer forums

Producers also discussed courier issues and considered if they were COVID related (e.g., not turning up on the scheduled day). GK highlighted that the main concern from producers is the problem of delay between sampling and testing. If samples are not collected then new samples should be taken, but this is an unfortunate burden on the producers which is not their fault. He highlighted that there should be a clause in PAS around this. He queried if producers have an opportunity to sample the batch and run the risk of not having a sufficient number of samples. Producers raised concerns that if a sample is picked up and does not arrive at the laboratory within the timeframe, then timeframe allowance needs some consideration.

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

9. Update from the BCS Operators' Representative

JC reported that the gathering at the forum was small. The meeting clashed with the world biogas event. Hopefully for the next meeting, the group will be larger but useful discussions took place, nonetheless. Discussions during the meeting included the CB tendering process, NNFCC's presentation on the first project of the Research Hub, and the new Twitter account for operators.

On the RBP issue, there are now two operators who have submitted samples alongside their own inoculum because they have had inhibitory response. Using their own digestate as inoculum has allowed them to achieve a valid result and pass result(s). JC questioned if the process of submitting samples be allowed to be formalised? TA noted that REAL have not seen test results to suggest this has given a definite improvement or made it past the QC requirement. The other operator who experienced this issue needs encouraging to share results with REAL.

Questions at the forum around the QP review included: would Scottish producers benefit from the revision and would operators in Scotland feel that they must contribute to funding the review? FD commented that the QP does not apply in Scotland so does not understand why operators would be asked to pay for this. AM added that it is worth making it clear that there is no benefit to Scottish producers, as the QP is more restrictive than SEPA's position statement.

10. Technical issues

- **Hub and Satellite Model**

Discussions took place with the CB's earlier this year on the sampling requirements for 'hub and satellite' sites in relation to one producer certified on the scheme, and concerns raised by the regulator about this producer's process. The producer is currently sampling based on tonnage at the 'hub' site with only two 'satellite sites' sampled last year and claims this is in line with existing scheme

requirements (CCS position, section 9 paragraph 7). The discussions have not concluded. REAL sought advice from the TAC with a fresh perspective on hub and satellite model sites.

Testing options presented for consideration: no additional requirements (satellites are visited by CB), 'site-specific' testing requirements (as used previously by AfOR) e.g., plant response, *E. coli*, *Salmonella* spp., and stability, (collectively this would be most suite testing costs, and this could be overly complicated), or annual sampling/testing for all satellite sites (would provide greater assurance, though nothing in PAS 100 / Technical Position document requiring this currently).

Neither GP nor TA were involved in previous discussions about these sites when the technical requirements were written. These rules state the operator must oversee the whole process. Though questions have arisen regarding how the site monitors the feedstock through a proper composting process. If there is only one piece of equipment, is this moved from site to site whilst each satellite goes through a sanitisation process? This operator argues that the sites form one process.

RL highlighted that, more often than not, each site does not receive a batch per year. The concerns are over stones (these came from the farmers land), and the original sampling procedure involved a lot of sub-sampling, which was overcomplicated. RL commented there is a risk that the site will pull out of the scheme if the CB insists that each site is sampled every year, due to the associated costs. He noted this issue has been ongoing and should be resolved as soon as possible before their audit.

GK commented that if there is nothing specific in the Scheme Rules that prevents this process, REAL should not introduce requirements to fit this site without changing the rules. If the organisation has one set of documents and if a sample fails on a parameter, the next batch should be tested.

JG informed that she would need to refer to colleagues on this issue. Multi-site sampling is accepted when assessing for QMS certification. This does not happen in product certification, but JG is aware of a document from 2011 that the EA produced about primary sector products/sampling of sites. If REAL/CCS allows it, then it would be acceptable, but the risks to certification need to be assessed. Multi-site sampling assumes that all sites operate under the same processes and procedures. If there is a problem on one of the sites, it reflects on all the other sites which puts a lot of pressure on the central body to ensure each of the satellites is smooth running.

ACTION: REAL and UKAS to discuss multi-site sampling

- **Field Bean Testing**

This is a technical issue that REAL were made aware of and would like to seek comments from the TAC. A field bean test was scheduled by an operator during validation, which was selected by accident. One of the three field bean tests failed, and the tomato test passed on all three occasions.

The operator did not wish to use the field bean test result for validation and does not market the product as growing medium ingredient. Additionally, there was no reference to field bean in their SOP's. REAL proposed that the field bean test results were to be ignored. The field bean result suggests the possible presence of herbicides, but we are not certain, as the operator had not investigated the failure. The tomato plant response test also provides some assessment of herbicide presence and deemed by the developers of the method as suitably sensitive for agriculture and field horticulture.

REAL wished to inform the TAC of this and record the discussion for the benefit of the PRT TWG.

GK deemed this a sensible decision. If there was nothing in the operator's quality documents or additional requirements which mentioned field beans, the operator cannot be held accountable.

ACTION: REAL to record field bean query discussion in notes for the next PRT TWG meeting

- [Update on RBP Inoculum Inhibition Issue](#)

There were five separate cases reported to REAL in a 12-month period by the laboratory or consultant/operator. Four of these were 'managed' by REAL following the same process/REAL internal procedure: 1. Discuss process and feedstock with operator to understand likely cause of inhibition, 2. Review RBP test biogas profiles to see length of inhibition and recovery, 3. Propose for site to provide own inoculum for testing alongside labs standard inoculum (little/no method deviation), 4. Different I:S ratios trialled, but there was no clear difference (may effect robustness of method and deviation), 5. Review inoculum comparison results.

REAL aims to conclude data gathering by the end of 2020 and issue a position statement in 2021.

ACTION: JC to encourage the operator experiencing issues with RBP inoculum inhibition to engage with REAL

11. AOB

AM raised an issue whereby an operator was looking for guidance on wooden on-the-go cutlery and whether it needed an EN coding. NJ was emailed about this issue. TAC members agreed that is a reasonable assumption that the wood, if naked and untreated, would decompose in the composting process (incl. shredding and screening) and it would no longer look like a fork after the process.

END

ACTIONS

- REAL and NRM to discuss inaccurate comments made by the laboratory regarding PRT results
- REAL to consider rolling out sampling webinars for Red Tractor (and possibly Soil Association)
- REAL to ensure T&C's satisfy requirements of ISO 17025
- REAL to circulate details on co-storage of product status digestate to all four regs and Janet
- REAL to circulate QA scheme rules proposal to all four regulators for comments
- RL and JT to further discuss product complaint related to a bund in Wales
- REAL to consider re-sampling in event of delayed courier for the CCS Sampling Guidance
- REAL and SN to discuss attendance at the next CCS and BCS producer forums
- REAL and UKAS to discuss multi-site sampling
- REAL to record field bean query discussion in notes for the next PRT TWG meeting
- JC to encourage the operator representative experiencing issues with RBP inoculum inhibition to engage with REAL