



Compost
Certification Scheme



CCS & BCS Summer 2026 TAC minutes

Thursday 25th June, Online

Attendees

Stephen Nortcliff (SN) Chair	Alison McKinnie (AM) Zero Waste Scotland
Jon (JH), REAL Managing Director	Lara Moggridge (LM) NRW
Georgia Phetmanh (GP) CCS/BCS	Colin Millar (CM), NIEA
Thomas Aspray (TA) CCS/BCS	Roy Lawford (RL) OF&G
Oliver Dunn (OD) CCS/BCS	David Roberts (DR) NSF
Grace Egan (GE) Research Hub	Nicholas John (NJ) ACL
Gregor Keenan (GK) CCS Producers' Representative	Dan Pursglove (DP), Environment Agency
Jo Chapman (JC) BCS Operators' Representative	Sultan Khan (SK) Laboratories' Representative
Fiona Donaldson (FD) SEPA	Philippa Arnold (PA) NFU

Welcome

SN opened the meeting and welcomed all committee members. Apologies were formally recorded for Daisy Butters of OF&G, Simon Thorpe of Red Tractor, and Julie Tate of NRW who were unable to attend, with full attendance otherwise confirmed across the committee. Jon introduced himself to the committee as the newly appointed Managing Director of REAL, having assumed his responsibilities approximately nine weeks prior.

GP delivered an update regarding recent internal staff changes, noting that Justyna Staff, the former Director of the Organic Materials Schemes, had departed the organisation during the previous month. GP informed the group that active recruitment for a replacement director is currently underway, with the formal application window scheduled to close the following week. The team continues to work in close alignment with Jon during this interim transitional period.

Actions from the previous meetings

November 2025 meeting

- **SEPA and CCS/BCS to discuss the publication of new End-of-Waste positions and CCS/BCS queries on some sections**

GP and FD met after the last TAC meeting to discuss the new positions, their implementations, and outstanding queries. The queries focused on operational expectations for auditing requirements, input

descriptions surrounding a specific waste stream, and the status of UKAS accreditation. Implementation was fully completed at the beginning of the year.

- **GP to follow up with AM to ascertain if the previous meeting action was taken forward regarding AM sending relevant QMS contact details or weblinks relating to risk assessment guidance**

AM confirmed she sent the QMS contact details to Kathy. She had also placed the relevant website links into the chat log during the previous session. GP verified if any further information was required, and it was confirmed that Kathy Nicholls did not raise any further outstanding requirements.

- **GK to share feedback with producers at the next forum meeting around early indicators to look for during PRT testing to help predict potential failures, and the option to request interim reports**

A detailed conversation regarding the Plant Response Test was executed at the producers' forum, and this feedback was fully covered. Additional producer feedback was gathered concerning the formatting of reports and the specific physical positioning of Plant Response Test results on the summary documentation.

- **GP to share update provided by SP on the previous meeting action regarding SP discussing effective communications with the team, highlighting to operators the work being undertaken in the background to investigate and rectify issues, with JC after the TAC meeting**

GP confirmed that this update was shared with JC following the conclusion of the previous meeting.

- **DR to forward digestate stability project paper from European Biosolids conference to GE and TA**

DR confirmed that all relevant research documentation and electronic links regarding the digestate stability trials had been forwarded to GE and TA.

- **LM to contact WRAP Cymru to explore potential input or collaboration on Hub project 2502 and report back to GE, aiming to introduce GE to WRAP Cymru to discuss this LM reported that she had received no direct correspondence back from WRAP Cymru.**

GE confirmed that the Research Hub had also received no communication but resolved to chase the contact immediately. SN inquired whether Emily Nicholls had established independent contact with the group, and GE committed to verifying this directly with her.

- **GE to consider LM's suggestion for the Hub to look at findings of WRAP Cymru's contaminants project, in relation to project 2502 concerning the evaluation of physical contaminants.**

GE confirmed that the Research Hub will actively pursue and chase WRAP Cymru regarding these project findings.

- **EA to send GE information on the EA's review of physical contaminant removal data obtained from industry.**

GE noted that discussions remain active with DP, and she will resubmit technical queries once the project enters the formal tender invitation stage. DP noted that because the regulatory data is archived within independent site permit documentation rather than a single aggregated database, manual collation remains complex, suggesting a targeted sample approach be established during a separate technical session with GE. SN emphasised that Project 2502 represents a massive, diverse workstream vital for defining feedstock contamination levels and establishing real-time sampling frameworks

- **SEPA to send invite to PA, DC, DP, and DR for non-waste digestate event being held on 26th November**

FD clarified that the exercise conducted the previous November constituted a formal call for evidence on non-waste digestate. SEPA is scheduled to launch a public consultation on non-waste AD guidance during the upcoming week, and committee members were advised to contact SEPA directly if they do not receive the consultation papers.

- **CCS/BCS to share written update from JC with the Approved Laboratories due to meeting absence.**

OD noted this action had been done and could be considered closed.

- **CCS/BCS to share TAC feedback with JC in response to the queries raised during the meeting**

OD noted this action had been done and could be considered closed.

- **TA to discuss the glass classification approach with approved laboratories and present issue to the TMWG.**

The main TAC session took place on the 13th of November 2025 and the Test Method Working Group convened on the 20th of November 2025. The working group reached a consensus that laboratories must not automatically categorise all glass fractions as structural sharps. The updated technical protocol mandates that any classification of glass as a sharp must be independently verified and confirmed by at least a second qualified member of laboratory staff. TA confirmed that this process had been issued for wider stakeholder consultation and feedback.

- **BCS to monitor progress on regulatory discussions around manure-based and non-waste AD and bring any issues or developments to the attention of the TAC**

GP reported that this rolling action had been temporarily paused due to recent personnel changes, with an update scheduled for the November session.

- **TAC to share any ideas with GE for the supply of digestate to the University of Southampton for the 'End-of-Waste Case Information for Digestate Derived Products' Research Hub project.**

GE reported that while no direct contact was recorded from TAC members regarding digestate supply, excellent operational engagement had been secured from several independent facility operators regarding their post-processing activities. The project team at the University of Southampton has completed a thorough report detailing this industry engagement, and GE renewed the call for members to submit additional digestate-derived products for inclusion.

- **HW to contact colleagues at NIEA about compost product complaint reported at the TAC by ACL**

This complaint data was passed on to the NIEA.

- **CCS/BCS to confirm to all TAC members whether the summer meeting will take place in person**

This was actioned. GP informed that the upcoming winter committee session is currently being evaluated to potentially take place as a physical meeting.

CCS & BCS updates

Scheme Stats

OD reported that the CCS currently certifies 167 certified processes, indicating a net reduction of 5 processes since the previous reporting period. The geographical distribution of these processes comprised 127 situated in England (a decrease of 4), 20 in Scotland, 13 in Wales, 6 in Northern Ireland (a decrease of 1), and 1 in the Republic of Ireland. Collectively, these producers process approximately 4.1 million tonnes of organic input material per annum, yielding an estimated 2.0 million tonnes of quality certified compost annually. Since the November 2025 TAC, the scheme has recorded 4 new applicants, 1 certificate suspension, 4 formal withdrawals, and 0 new active producers.

The BCS currently accounts for 110 certified processes, a net increase of 2 processes since the previous reporting meeting. The geographical distribution of these certified operations is as follows: 80 situated in England (an increase of 1), 10 in Scotland (a decrease of 1), 9 in Wales, and 8 in Northern Ireland (an increase of 2). Collectively, these operations process approximately 6.2 million tonnes of organic feedstock per annum, yielding an estimated 5.5 million tonnes of digestate annually. Since the November 2025 meeting, the scheme has recorded 2 new applicants, 0 certificate suspensions, 1 formal withdrawal, and 3 new active operators.

DP, FD, AM, and CM and SK expressed interest in being notified at regular intervals on scheme stats (including applications, suspensions, and withdrawals).

No comments or questions were raised regarding the scheme development summary paper.

Update on the Research Hub

GE delivered a review of the Research Hub portfolio, covering new projects 2603 and 2605 alongside ongoing active projects.

The scope of Project 2603 was then discussed. RL raised an operational warning, reminding the committee that the Environment Agency had previously issued a regulatory interpretation stating that the mechanical dewatering of digestate constitutes a distinct further processing step, which legally returns the material to a waste status. AM requested clarification on how the proposed work builds structurally upon historical research conducted by external bodies, emphasizing that the project must explicitly address known industry challenges such as elevated physical contamination within separated fibre fractions; which had been considered before by a research project based in Scotland.

GE clarified that within the context of the proposal, dewatered solid digestate cake refers strictly to separated digestate fibre without further complex post-processing, and committed to mapping out its relationship to past studies. SN noted that his independent literature reviews had revealed no substantial published data regarding the large-scale application of non-manure compost-blended digestates, while AM noted that a relevant field trial had been historically executed in Scotland focusing on non-waste derived digestate inputs.

RL informed the committee that a crop-based, non-PAS 110 digestate growing media product named RocketGrow is currently commercialised within the UK, originating from an anaerobic digestion plant in Somerset. GE confirmed that RocketGrow is already integrated into the research project as a non-waste analogue comparator. SN and GE resolved to formalise a tracking process to ensure all upcoming Research Hub selections build directly upon external datasets without duplicating old ground.

Regarding Project 2605, which reviews digestate potentially toxic elements and physical contaminant limits, GE explained that the work evaluates whether contaminant thresholds should be calculated relative to specific physical fractions of digestate rather than on a standard fresh matter basis. SN supported the work, noting that the analytical parameters set out in PAS 110 are narrow and have remained largely static since 2014. The research will utilise the extensive BCS database to conduct long-term trend analysis, exploring whether future environmental safety thresholds should be derived from phosphorus concentrations rather than nitrogen alone.

GE provided progress reports for the active research portfolio:

- For Project 7 on Risk Assessments for End-of-Waste Frameworks, the final report is timed to publish ahead of the Environment Agency's formal revision window for the Resource Frameworks to provide a robust, peer-reviewed evidence base. WSP is currently executing internal Quality Assurance reviews, and the REA is actively validating the methodology.
- For Project 2502 on Contaminants in Biowaste Streams, the drafting of the tender invitation is underway. GE and Jackie have been refining the scope with the original authors to strictly define operational tasks and prevent structural mission creep.
- For Project 4 on PRT Interpretation and Comparison, BioSS has initialised the statistical analysis of parallel spring barley and tomato plant trials in CCS compost to determine whether a shorter German spring barley test can successfully supplement or replace the standard 28-day tomato protocol.
- For Project 10 on Alternative Control Growing Media, Stockbridge Technology Centre was successfully contracted following a failure to secure project deliverables from the prior contractor, RSK ADAS. An initial planning session has concluded, and a simplified work programme is proceeding smoothly.
- For Project 9 on End-of-Waste Case Information for Digestate Derived Products, the academic team at the University of Southampton has completed its comprehensive industry report following detailed engagement with UK and European operators. The work stream is on track to conclude in mid-September 2026 to ensure its findings are available for the upcoming Anaerobic Digestion Resource Framework revision.
- For Project 2505 on Residual Biogas Potential Test Duration Review, the steering group has been formally appointed, and the preparation of the tender invitation is active, utilising historical data extracted from the BCS database.

Update from the Certification Bodies

DR reported that NSF had no significant structural updates to bring before the committee.

RL reported that there were three formal process withdrawals and one certificate suspension during the period, all from processes on the CCS. The operational causes for the CCS withdrawals involved one facility being placed into long-term mothballing, one operator failing to secure necessary personnel to facilitate the mandatory site inspection, and one process undergoing a complete change in material processing type. RL noted a strong preference for maintaining an online format for all future TAC sessions.

NJ presented the update for ACL, confirming that no complaints had been logged since the winter meeting. One certified CCS facility was formally withdrawn due to a land tenure issue, where a

wastewater treatment facility landowner required repossession of the physical site. The operator is currently diverting the corresponding waste tonnage to alternative processing assets within their existing corporate portfolio. NJ informed the committee that ACL has prioritised the expansion of its auditing capacity by employing and training two internal staff auditors, collaborating with Jenny to ensure full training completion by the end of the calendar year.

Update from the Approved Laboratories

SK reported that operational performance remains stable, with no critical issues raised during the recent quarterly laboratory coordination meeting. A new mass spectrometer instrument has been fully initialised, verified, and approved for accredited testing. SK expressed thanks to TA and GP for providing direct technical support during the calibration and validation phases, noting that customer complaints have dropped significantly.

SN raised a technical query regarding whether recent high summer temperatures were causing logistical delays or sample degradation within courier networks, noting historical vulnerabilities regarding temperature control during transit. SN recalled past monitoring exercises involving the movement of organic sludges from Spain to the United Kingdom, where independent transit thermostats revealed that commercial vehicles frequently failed to maintain advertised temperature-controlled criteria.

SK explained that the laboratories are currently trialling an alternative logistics arrangement with FedEx, which permits operators to drop off samples directly at accessible local retail shops rather than relying on driver collection or regional depots. This trial currently supports five customers who historically experienced severe courier collection friction, though SK noted that courier performance ultimately depends on individual drivers. JC asked if the high temperatures had created operational problems for the testing inoculum. SK confirmed that despite the current heatwave warnings, the laboratory maintains excellent inoculum reserves that are performing to required technical specifications.

Update from the CCS Producers' Representative

GK summarised the primary items of discussion arising from the recent producers' forum:

Regarding the internal Quality Management System auditing position, the forum executed a thorough review of the drafts and suggested that Certification Bodies be permitted to record administrative infractions as formal observations during an initial transitional period.

Operators reported experiencing scheduling issues and booking delays when interacting with Eurofins, suggesting that CCS engage directly with laboratory directors to resolve the issue.

Forum attendees emphasised that laboratories must maintain a rigorous understanding of Animal and Plant Health Agency regulatory deadlines, ensuring that pathogen test results are processed and reported within mandatory statutory timeframes.

Concerns persist regarding the long duration, high cost, and lack of clear guidance surrounding the standard Plant Response Test. Producers expressed strong support for the active Research Hub projects aimed at reducing testing windows.

Some producers requested that PRT results be structurally relocated from the final page of laboratory summary reports to the front cover to ensure critical data stands out clearly.

GK reported some confusion regarding the scheme's formal requirements concerning the co-location of certified PAS-compliant material and non-certified waste streams on a single operational site. GK noted that the forum generally believes there is no issue if the process mix is appropriate. GP explained that

REAL is currently engaged in a comprehensive revision of the scheme rules, noting that co-location requirements remain subject to active technical discussions with UKAS. One producer representative, AC, raised a specific concern regarding whether the production of non-PAS material in volumes exceeding certified PAS compost is permitted, which GP clarified must be audited and assessed on a case-by-case basis by the relevant Certification Body.

JC requested a formal summary defining the exact scope of the current Scheme Rules revision and asked whether the updates would impact BCS operators. GP explained that the circulated consultation drafts covered independent sampling requirements, clear procedures governing the transfer of participants between Certification Bodies, and general administrative updates. These drafts remain under review by UKAS, and GP committed to redistributing the full consultation text to JC.

SN requested input from environmental regulators regarding the co-location of certified and uncertified materials. DP stated that from the perspective of the Environment Agency, co-location is acceptable provided the facility maintains absolute physical separation and implements robust controls to prevent cross-contamination. JC noted that two independent operators are currently designing innovative digestate post-processing installations that will necessitate separating a certified PAS 110 fraction from an uncertified fraction on the same facility.

Update from the BCS Operators' Representative

JC delivered a comprehensive report detailing the feedback from the BCS operators' forum:

The proposed technical position regarding internal Quality Management System audits was debated at length and remains an area of significant feeling among the operators.

A query was raised regarding specific waste codes and phrasing within the published Anaerobic Digestate Resource Framework. Operators highlighted a constraint requiring input materials to originate from "anaerobic digestion solid waste," pointing out that the vast majority of commercial facilities generate both solid and liquid waste fractions simultaneously.

Furthermore, operators noted that code 19 06 06 specifies that input material must be a "stabilised" and pasteurised digestate, which effectively prevents agricultural plants processing unpasteurised manure or slurry from utilising the code, even if they import non-agricultural unpasteurised materials. Operators requested that these specific entries be prioritised for correction during the next regulatory review.

Regarding Regulatory Position Statement 317, operators reported that the introduction of plastic limit reporting mandates was highly complex and difficult to communicate internally, requesting that this exemption be presented in a more accessible, simplified format.

Some operators expressed interest in exploring an additional voluntary quality assurance certification category. This would allow facilities to secure independent quality certification for commercial marketing purposes without needing to satisfy full regulatory End-of-Waste criteria, a need intensified by the wider regulatory expansion across non-waste Anaerobic Digestion.

During the subsequent discussion, RL noted that historically, many early anaerobic digestion plants were initialised using sewage sludge digestate seeding on the assumption that the seeding material does not permanently remain within the active system. If compliance sampling occurs immediately following a seeding event, severe non-conformances are triggered, but after several full operational processing cycles, the feedstock restrictions within the Resource Framework cease to be relevant.

TA agreed that the introduction of the plastic limit under the BCS requires clear reporting parameters and offered to review the specific complaints offline with JC. GP stated that REAL will deliver an update at the next TAC meeting about internal considerations regarding manure-based feedstocks and non-waste AD frameworks, a development SN endorsed as highly important.

DP responded directly to the solid waste phrasing query within the ADRF, stating that a review of official waste classification guidance indicates that the word "solid" is only intended to apply to composting operations and should not appear alongside digestate codes. DP and JC concurred that the restriction was almost certainly a copy-and-paste mirroring error carried over from the compost text during drafting, and DP committed to double-checking this formally with the Environment Agency technical team.

Technical issues

Internal QMS Auditing Technical Position

OD introduced the latest drafts of the internal Quality Management System auditing technical position. Inconsistent non-conformances raised by Certification Bodies concerning internal audits were challenged during the May 2025 Forum. A technical position was subsequently drafted to achieve maximum operational consistency and eliminate interpretative variations among CBs. Although previously reviewed by the TAC, this position was never formally published, but CBs have been auditing against its principles in practice (as no concerns were raised by the TAC when reviewed).

The relevant clauses within PAS 110 are 4.7.1 (mandating that producers conduct and record internal audits at planned intervals, at least annually, to determine QMS conformance and effective implementation), 4.7.2 (requiring that auditor selection ensure objectivity and impartiality, specifying that each auditor shall not audit his or her own work), and 4.8.1 (requiring senior management to review the ongoing effectiveness of the QMS and HACCP plans).

REAL's original strict interpretation proposed that any consultant or consultancy organisation that has written, co-authored, or maintained significant involvement in drafting a site's QMS is considered to hold permanent structural ownership of that work. Consequently, such individuals or organisations are barred from conducting the internal audit of that specific QMS. Following feedback from industry, participant representatives, and regulators, three redrafted options were brought before the TAC for evaluation:

- **Option 1 (The compliance check interpretation):** This redefines the internal audit as a test of day-to-day behavioural compliance (verifying whether site personnel are correctly implementing procedures and maintaining logs) rather than an evaluation of the structural adequacy or design quality of the QMS documentation itself. On this basis, a consultant who authored the QMS is not auditing their own work, because the work being assessed belongs to site staff responsible for daily operations. Management reviews under clause 4.12.1 remain strictly reserved for senior management, and the restriction on auditing one's own work continues to apply if the auditor is personally responsible for the operational records being checked. Colleagues within the same consultancy who had no personal involvement in drafting the QMS may conduct the audit without restriction.

- Option 2 (The ownership interpretation): Restores the focus of "own work" to legal and operational responsibility rather than authorship. Because the QMS is commissioned, approved, and adopted by the operator, full legal responsibility sits with the operator. A consultant acts merely as a contractor; operational ownership transfers to the operator upon completion. Therefore, a consultant-author is auditing the operator's adopted work, meaning the prohibition does not apply, though CBs retain case-by-case discretion.
- Option 3 (The split clause interpretation): Separates clause 4.11.1 into two distinct elements. The first requires a judgment on whether the design of the QMS conforms to its plan to produce fit-for-purpose product, while the second requires a practical check of whether site staff are operating in accordance with the system. A consultant-author is permitted to execute the second element (operational compliance checks) but is strictly prohibited from conducting the first element (design-adequacy assessment), which remains reserved for senior management under clause 4.12.1.

RL stated he could support Option 1 or Option 3, but not Option 2, noting that a consultant must be judged on their design work in the same manner as a self-employed gardener. LM agreed with RL, but opposed Option 1, and noted that Option 2 would fail practically because operators will always lean heavily on consultants, leading her to lean toward Option 3.

DR noted that Option 2 does not fit the regulatory remit of the scheme, confirming that NSF currently prefers Option 1 but would take time to thoroughly evaluate Option 3. GP explained that REAL will aim for a consensus position, noting that if agreement cannot be achieved during the session, the decision will be coordinated via email, with a final draft position redistributed to the TAC for closing comments.

TA suggested that the technical language be amended to remove specific references to "consultants," framing the restrictions more generically to cover all internal and external actors, a refinement endorsed by OD and GP.

Sultan expressed formal support for Option 1.

GK stated that Option 1 represents the most straightforward and sensible approach, with Option 3 serving as a viable second choice, noting that cross-laboratory impartiality issues have not emerged as a practical failure under current CB auditing.

JC raised concerns regarding the practical implementation of Option 3, noting that an internal audit must encompass all structural areas of the standard. Under Option 3, a consultant could only execute a partial compliance check, forcing senior management to personally audit the remaining design-adequacy elements. JC noted that while senior management execute formal reviews, they rarely possess the time or inclination to perform detailed, granular QMS audits, meaning Option 2 provided a more workable mechanism if supported by a strong management review.

CM welcomed any technical transition that moves internal audits away from purely desk-based exercises, inquiring whether specific operational pinch points, such as independent sampling compliance, would be prioritised. SN observed that while the synthesis of data was excellent, the proposed solutions did not fully address all distinct dimensions of the problem.

OD summarised that Option 2 received minimal support across the committee, with opinion erring primarily towards Option 1, and Option 3 remaining a less popular but viable alternative. The text will undergo minor updates to incorporate generic phrasing.

Response Timeframes for Compliance Notices

GP introduced a regulatory query submitted by NRW regarding a recent product complaint investigation executed at a certified composting site in Wales. NRW requested clarification regarding the formal timelines governing a producer's response to a compliance notice and whether certificates should be extended or suspended in light of critical investigative findings. GP informed the committee that the current scheme rules do not prescribe mandatory response timeframes or automatic suspension criteria for complaint investigations, which are managed case-by-case, but brought the matter to the TAC to discuss whether hard rules should be established or CB discretion maintained.

RL stated that establishing a rigid mandatory timeframe would be highly impractical due to the extreme variation encountered between individual complaint cases.

LM explained that NRW's concern focused on the next steps when dealing with non-compliant operators whose operational performance degrades considerably over multiple years, emphasising that regulators and schemes share a clear responsibility to enforce standards against uncooperative producers.

GK suggested exploring a compromise framework where non-conformances are assigned distinct severity categories (e.g., critical, moderate), with each tier linked to a standardised compliance window. DP supported GK's suggestion, stating that incorporating clear redlines where a definitive lack of action triggers automatic suspension or withdrawal would provide regulatory confidence and strengthen the guidance.

NJ supported the categorisation of non-conformances, noting that other certification schemes managed by ACL utilise defined severity tiers with standard response limits that act as a strict backstop leading to suspension, offering to share these examples with OD.

RL countered that the existing 45-day response limit functions perfectly for regular annual inspections, but complaint-driven spot inspections are highly case-specific. He argued that prescribing fixed limits for complaint investigations would be unworkable, as suspending a facility prematurely frequently impedes the operator's physical ability to resolve the underlying technical issues.

JC offered to share the formal non-conformance classification framework utilised within the animal feed certification sector to support the review, an offer GP welcomed. GP concluded that while there is technical support for investigating the categorisation of non-conformance severity, there is no overwhelming consensus for mandatory response timeframes, noting that REAL will review the scheme rules to identify potential informational gaps regarding the steps a producer must take during product complaint investigations.

GP suggested whether the schemes could suggest the specific circumstances under which a certificate must be suspended, including examples of "sufficiently serious non-conformances," or whether this determination should remain at the discretion of the Certification Bodies. DP suggested that the guidance could include an illustrative, non-exhaustive list of examples of serious non-conformances, similar to the approach already used in other guidance documents, to give CBs a practical reference point without being fully prescriptive.

Field Bean Test Cultivar

TA introduced a technical paper regarding the field bean bioassay utilised within the Compost Certification Scheme to test for the presence of herbicide residues. This diagnostic test has been an active component of the scheme protocols since 2010, traditionally utilising the Fuego bean cultivar. Technical investigations have now revealed that the Fuego cultivar has been completely superseded in the agricultural market by superior, modern varieties.

The Stockbridge Technology Centre laboratory has recently executed a series of trials on alternative cultivars to verify whether their leaf structures exhibit identical, reliable diagnostic symptoms when herbicide residues are successfully detected. Based on these experimental trials, the laboratory recommends transitioning to a new variety named Lynx, an update that is fully supported by REAL.

TA requested that the committee confirm its formal agreement with this agricultural variety substitution. The committee indicated its unanimous approval, and the technical transition was signed off with no further comments or objections raised.

Any Other Business

CM renewed his apologies for missing the initial portion of the morning session and asked if he can share SN's TAC note with his director Richard Crew. CM explained that his regulatory remit is exceptionally broad and encompasses numerous competing authorities, meaning he is spread far too thinly to review these highly detailed technical materials in proper isolation.

Furthermore, CM highlighted a noticeable escalation in public and external scrutiny surrounding certified sites, observing a significant rise in Freedom of Information requests and legal challenges regarding ongoing facilities. He noted that the primary motivation driving these external campaigns is frequently linked to local odour complaints, which underscores the vital importance of the audit process focusing intensely on key operational pinch points.

GP queried whether the request related to the independent note drafted by SN. CM confirmed this was the case, adding that because the NIEA does not possess the massive institutional scale or resources of the Environment Agency in England, such targeted structural support would be highly welcome.

DP flagged a major regulatory issue to the wider committee, revealing that the Environment Agency is currently engaged in several active investigations where non-compliant material managed to successfully secure formal scheme certification. The agency is preparing to issue formal notifications to both the relevant Certification Bodies and REAL regarding the specific operations involved. DP is currently consulting with agency legal counsel regarding the finer details of these cases.

DP explained that while the composite samples submitted for routine laboratory analysis appeared to pass the required scheme criteria, subsequent physical inspections executed on-site revealed that the actual material was heavily contaminated. This stark discrepancy strongly points to potential data or process manipulation at the facility level. He stressed that the situation must be handled with extreme care and committed to sharing comprehensive details with the group once legal clearances are obtained.

SN expressed profound concern regarding these disclosures, noting that evidence of analytical samples failing to match the physical material present on-site represents an exceptionally serious structural

challenge to scheme integrity. SN warned that if these discrepancies are exposed by local public campaigns, it could cause immense reputational damage to the organic recycling sector.

Recalling a historical parallel from his long career, SN shared an instance where he conducted research for the Department of the Environment and Defra regarding public attitudes. A national newspaper obtained a distorted summary of the work and ran an aggressive campaign designed to entirely trash organic recycling based on no technical knowledge. Although the data originated from a standard telephone interview executed by Ipsos, the resulting sensationalised press coverage bore no resemblance to the actual study and prominently featured the word 'WASTE' in large lettering. SN emphasised the critical need to safeguard scheme integrity against such vulnerabilities, a sentiment DP echoed.

RL noted that producers are supposed to witness samples being taken on the CCS, though this requirement cannot be applied in the same way to liquid material under the BCS. TA added that sampling guidance already exists for separated fibre.

SN closed the discussion by observing that issues of this kind risk setting back the sector's progress considerably, and thanked GP and OD for the substantial amount of work they contribute to running the schemes.

End: 2.30 pm

Actions:

- LM to chase WRAP Cymru to explore potential input or collaboration on Hub project 2502 and come back to GE
- GE to check with Emily Nichols at REA whether she has been in contact with WRAP Cymru
- GE and SN to take forward the question of 'not treading over' old ground with the Hub projects
- AM to try to find trials using fibre as a growing medium, to avoid duplicating research on proposal 2603
- GE and EA to later discuss the EA's review of physical contaminant removal data obtained from the industry with more questions when Hub project 2502 is at tender review stage
- SEPA to circulate guidance on non-waste AD for consultation soon
- CCS/BCS to contact SEPA if the guidance on non-waste AD has not been received for consultation
- BCS to monitor progress on regulatory discussions around manure-based and non-waste AD and bring any issues or developments to the attention of the TAC
- TAC members to let GE know of any digestate-derived products to showcase in the University of Southampton 'End-of-Waste Case Information for Digestate Derived Products' Research Hub project
- CCS/BCS to confirm to all TAC members whether the winter meeting will take place in person
- OD to send FD and AM the name of the withdrawn process in Scotland
- CCS/BCS to further discuss with the EA whether to share list of certified sites more regularly, in addition to the CBs sending ad hoc notifications in the event of certificate suspensions and withdrawal
- OD to send CM the list of withdrawn and recertified processes recently withdrawn in NI
- OD to share withdrawn and suspended processes with Approved Laboratory representative (SK)
- GP to email DP about the CCS/BCS physical contaminant and stones test methods
- GP to send JC information on changes we were consulting on in the current draft version 10 of the rules

- CCS/BCS to consider giving producers an idea of the direction of travel for the PAS vs. non-PAS rules
- TA to speak with JC offline about the plastic limit reporting issue
- CCS/BCS to consider moving PRT results to the front page of the summary report
- DP to double-check the error regarding EWC code 19 06 06 in the ADRF, specifically the reference to 'solid waste' for digestates, and confirm whether this was a copy-paste error carried over from the compost section
- CCS/BCS to consider TAC feedback regarding internal QMS auditing position and come back with next steps
- NJ to consider sharing NC classification guidance used under other schemes with CCS/BCS
- JC to share animal feed non-conformance framework with CCS/BCS
- CCS/BCS to further discuss with the CBs if guidance on response timeframes to compliance notices, taking into account the severity of the NC(s), would be useful
- CCS/BCS to review scheme rules and identify any gaps in information/requirements regarding the expectations for product complaint investigations, in terms of steps the producer needs to take
- CCS/BCS to further discuss with the CBs a list of examples for sufficiently serious NCs warranting suspension
- CM to share note from SN with Richard Crowe at NIEA, to highlight expectations for TAC members