



Compost
Certification Scheme



CCS & BCS Summer 2025 TAC minutes

Wednesday 18th June, London and Edinburgh

Attendees

Stephen Nortcliff (SN) Chair

Lara Moggridge (LM) NRW

Georgia Phetmanh (GP) CCS/BCS

Jo Chapman (JC) BCS Operators' Representative

Thomas Aspray (TA) CCS/BCS

Roy Lawford (RL) OF&G

Oliver Dunn (OD) CCS/BCS

David Roberts (DR) NSF

Duncan Craig (DC) CCS/BCS

Nicholas John (NJ) ACL

Grace Egan (GE) CCS/BCS Research Hub

Fiona Donaldson (FD) SEPA

Gregor Keenan (GK) CCS Producers'
Representative

Sarah Pitcher (SP) Laboratories' Representative

Alison McKinnie (AM) Zero Waste Scotland

Kathy Nicholls (KN) EA

Welcome

SN welcomed everyone to the multilocal TAC, all attendees introduced themselves.

Actions from the previous meetings

November 2024 meeting

- REAL to continue exploring potential option for operators/producers to take samples directly to a depot in order to avoid courier-related issues with sample collection on-site

OD confirmed that the issue had been discussed with Labs with both labs now offering FedEx depot drop-off as a sample delivery method; a guidance document explaining the system and how to use it has been produced and was published at the beginning of this month.

- REAL to confirm in future which countries the applicants/suspended/withdrawn sites are located in

OD confirmed this has been actioned.

- KN to email EA colleagues to request final draft RFs that can be shared with the CBs

KN actioned, to be discussed later in the meeting.

- REAL to consider informing operators before or during the REAL RF webinars whether there are any changes to allowable waste inputs that may impact them

Still an open action.

FD mentioned that SEPA updated their EoW position, adding that the changes mostly related to accessibility and formatting rather than substantial content changes, but would share with REAL.

- REAL to circulate final draft RFs to all TAC members present at the meeting

Actioned on the day of the meeting.

- REAL to forward email to the EA regarding the RBP data request raising queries around the request

OD confirmed this had been actioned, but there was no update regarding the data request beyond that.

- REAL to consider sharing with producers/operators the safeguards that have been introduced to the schemes and work in the background to ensure the system is still robust (re E. coli investigation)

GP informed the committee that changes were introduced to the laboratory T&Cs around the training requirements for laboratory staff and internal audits. Approved labs must ensure that staff involved in PAS testing are suitably trained; in order to understand the implications of any decisions they take on PAS 100/110 results (and CCS/BCS are considering the development of training to support the labs in this respect). Additionally, approved labs are now required to conduct and record internal audits at least annually or more frequently for their subcontractors too.

GP added that the other developments were more 'corrective' or 'responsive'. The next version of the scheme rules requires producers to provide data to us when requested e.g., batch information, specific end use of material dispatched from site, etc., to expediate the process of obtaining and analysing data in any similar event. And if a similar issue occurs again, there is a possibility that the lab's appointment will be terminated., in line with existing contracts.

GP concluded that this information was missed from our updates at the recent forum meetings but will be shared at the next meetings.

- REAL to consider sharing update with operators either during or before next forums about independent sampling and the information provided to REAL in terms of challenges getting on-site

OD had no additional comment on this issue since the previous meeting, stating that the schemes have paused discussion regarding independent sampling until the latest version of the rules are published.

- TAC to share any thoughts/opinions/concerns on compost going to horticulture with DC

DC reported that it was during the previous meeting that he had raised the topic of work related to compost use in horticulture. He reiterated the intention to ramp up discussions on this area. No updates or new information were available at the time of the meeting, but DC confirmed that work in this area would continue as the peat ban progressed.

- TAC to share any thoughts as soon as possible with KN about concerns over potential risks associated with the use of digestate to horticulture or whether the market should set the standard

RL queried whether PAS 110 currently covered crop-based digestate.

KN responded that the horticulture sector appeared to favour digestate fibre but remained cautious due to its waste origin. She noted that the market potential had been opened and emphasised that if

digestate fibre could meet relevant standards, it would be for the industry to drive market development. KN clarified that her previous questions regarding PAS 110 had focused on agricultural use, and she queried whether future risk assessments would also cover horticultural applications.

DC noted that there were no comments at present, but with the risk assessment project ongoing, it was hoped that sufficient evidence would emerge to determine whether extending to horticulture was appropriate. He added that the final review of the Resource Frameworks (RF) would be a useful opportunity to revisit the matter. While the interim RF permitted digestate use in horticulture, further data might become available before the final version.

KN suggested that fibre or liquid digestate products could be viable for the amateur gardening market and noted that some were already commercially available. She also raised the issue of dried digestate products such as pellets, explaining that PAS 110 did not currently provide test methods for these materials. Companies were therefore submitting individual end-of-waste applications. KN highlighted a communication from BSI that had questioned whether PAS 110 required revision, to which she agreed, noting the need to expand the range of materials covered beyond SF, SL, and WD. She emphasised the importance of including additional materials to support market diversification.

DC confirmed that he and Justyna Staff had begun initial discussions with BSI regarding a PAS 110 review. Although still in early stages, there was enthusiasm on all sides to proceed. Preparatory work including scoping and workshops would be needed, and the review process was expected to take 18 months to two years.

AM recommended engaging with Quality Meat Scotland as a useful starting point when considering risk assessments, particularly in relation to their existing work.

KN noted that part of the test involved the RBP, but raised a question regarding pellets, asking whether these should be put back into liquid form and reconstituted.

AM responded that the assessment did not cover that aspect, explaining it focused more on concerns that QMS had around contaminants and botulism. AM suggested TA might have more information and agreed to send the link regardless.

TA asked if different limits were being considered.

KN expressed uncertainty, explaining the standard was being set around something wet and sloppy rather than a more stable, dry product like compost. KN believed a dry, stable product with a known nutrient content and storability would be more attractive to farmers. KN was unsure whether the stability test allowed for this and noted that was likely why individual end-of-waste cases were being submitted. KN asked GP to find out the current status of the review and whether it would proceed.

SN emphasised the importance of getting the assessment right.

- REAL to confirm the name of the withdrawn Scottish site with SEPA

OD confirmed this had been actioned and regulators have been made aware of withdrawals since then.

- RL to confirm the name of the site currently supplying digestate to horticulture with DC

DC confirmed that RL shared the site information; however, DC had not taken any further action.

RL noted that the site in Scotland supplying digestate to horticulture probably would not be certified if it were located in England, as certification would not be required there. RL explained that the fibre was made from non-waste materials, so certification was not strictly necessary.

- CBs, and REAL to agree what records the CBs will need to check in terms of management of compost/digestate by the end user, especially when third-party spreading contractors are used

GP confirmed that the schemes discussed this topic with the EA during a meeting at the beginning of the year and KN advised that records from third-party contractors need to be provided to producers and then shown to the CBs (electronic versions are fine). Producers need to have records of where material is going per field per farm, who's carrying it, the contractor must have signed that they've seen a nutrient management plan (NMP), and there needs to be a definite market. There needs to be evidence that the producer has asked the question, whether the contractor has a NMP from the end user, and producers need to know where the material is going.

The schemes discussed this with the CBs and recorded an action to ensure that the requirements regarding the assessment of evidence for NMPs are included in the audit checklist. GP confirmed that an update on these draft requirements in the RFs will be given later during the meeting, as some changes have been introduced.

JC asked whether a NMP was required for each holding where spreading occurred.

KN confirmed that contractors should have access to the NMP for each holding and clarified that the RFs specify the end user must have a valid use for the material, demonstrated through the NMP.

JC added that access to farm fields and a spreading schedule were necessary, whether before or after spreading.

KN advised contacting KN for any queries on this matter.

NJ pointed out that the main change was that contractors spreading material needed to sign to confirm they had seen the NMP, although plans themselves were not physically checked.

KN agreed with NJ's comment.

JC noted, as RL had said, that the end plan would cover all spreading records.

AM informed KN that they had reviewed reports on the REA website but believed full Risk Assessment reports were available through WRAP.

- RL and other TAC members to feed back to KN if any clauses in the final draft RFs are unclear

This action remains open.

March 2025 catch-up actions

- CCS/BCS to send 2024 annual report to TAC when finalised and published

GP confirmed this was actioned at the end of last month.

- CCS/BCS to check back on notes from previous QP webinars held with the REA to identify if reasons for removing certain waste inputs from the RFs were shared, and send to GK if so

DC explained that a workshop was held by CIWM. The workshop indicated that the waste code changes were primarily intended to ensure Appendix B aligned with the standard rules permits, which were also under review that year. It was noted that green waste would be included and appeared in both RF documents, along with acetic acid, which was absent from both the Compost and AD RFs. An effort was made to standardise compostable packaging within the waste codes.

DC concluded that aside from these points, no other waste code-related changes were identified.

- CCS/BCS to ensure that NRW and NIEA positions on the RFs are included in the comms for producers around the RFs, and the updated scheme rules

OD confirmed that NRW and NIEA placeholders have been added to the RF-affected scheme documents and scheme comms pieces, where appropriate. They will be removed or updated as and when we hear additional information from the regulators.

- CCS/BCS to share final RFs and RPS' with producers when provided by the EA prior to publication

Still an open action, to be closed out as and when all regulatory documents and positions are finalised.

- GP to check back on discussions with GK and one of the approved labs regarding concerns over the services provided by that lab

GP confirmed the action had been completed but reported that further issues had been raised by the producer during the recent CCS forum. These issues related to couriers, customer service, and PRT results. GP stated that ongoing contact was maintained with the producer and discussions were underway with the lab in question. The producer had informed GP that the lab planned to hire additional staff to improve customer service and courier bookings. The producer had attended the recent forum meeting, and this feedback was scheduled to be shared later during the meeting.

There were no comments or questions from attendees.

- TAC members to consider volunteering to join project management teams assembled for specific Research Hub projects

It was explained that this request arose from difficulties in recruiting for the Research Hub steering groups. Steering groups existed for all ongoing projects, but the process of selecting new projects for 2025 was underway. Some vacancies were expected for one or two projects this year.

- JC to raise any NI-specific queries with CM at NIEA directly by email if not yet answered

JC confirmed that their only query is will the RF apply or not, but nothing else to raise in that case.

CCS & BCS updates

Scheme Stats

OD reported that as of 1 June 2025, CCS had 173 certified processes: 133 in England, 20 in Scotland, 13 in Wales, 6 in Northern Ireland, and 1 in the Republic of Ireland. Approximately 4.0 million tonnes of feedstock were processed annually, producing around 1.9 million tonnes of certified compost.

For BCS, there were 107 certified processes as of the same date: 79 in England, 11 in Scotland, 9 in Wales, and 8 in Northern Ireland. Approximately 5.8 million tonnes of feedstock were processed annually, yielding about 5.0 million tonnes of certified digestate. Since 26 March, there had been one new application, no suspensions, one withdrawal, and no new certified processes.

The withdrawal related to a Scottish process that was decommissioned after multiple non-conformities were not corrected within 45 days of audit. The site then closed down.

No questions were raised regarding the updates.

Update on the Research Hub

GE provided updates on the Research Hub. The Hub was still working with project manager Jackie Robinson, now on a permanent basis after initially being temporary. Given the number of selected projects that had gone to tender, the Hub decided that having a permanent project manager was a good idea. GE introduced themselves as the new Research Hub manager. GE reported that the Research Hub Panel had shortlisted two new projects that week and planned to meet again in July to assess which projects to take forward into 2026.

CCS project updates:

Project 7: the risk assessment project for RFs, was mentioned earlier in the meeting. This project aimed to provide up-to-date information on compost and digestate. WSP had been contracted to carry out this work, with regular meetings held. WSP was conducting a literature review and identifying groups to include in the risk assessment.

Project 4: concerning PRT interpretation and comparison, sought to compare German spring barley with traditional tomato testing using CCS compost. An open tender for this project was underway, notably for the statistical analysis, with the invitation closing on 31 July. GE encouraged anyone interested to contact either them or Jackie for further information and noted a Q&A process would be provided.

Project 10: involved replacing peat as the control growing medium. ADAS had been recently appointed, and a steering group meeting was taking place, where ADAS and the steering group scoped out peat sourcing, experiment design, and materials to be produced.

BCS project updates:

Ongoing projects included Project 8, which appraised the impact on digestate quality from using a finer screen to remove contaminants. This arose in response to operators using finer screens with uncertainty about effects on digestate quality. The Hub was seeking tenders and steering group attendees, with contact details provided for GE and Jackie.

Project 9: focused on digestate-derived projects aimed at broadening permissible post-processing for digestate. A contractor, University of Southampton, had been appointed, and the steering committee had discussed the scope and methods with the contractor.

SN expressed satisfaction with receiving tenders from a wider range of organisations. SN noted that Megan Muller-Girard had helped engage a larger group to view the tenders, indicating progress in broadening potential tender applicants. SN welcomed the return of the University of Southampton, highlighting their previous active involvement.

GE agreed, emphasising the importance of avoiding repeated tenderers and identifying better ways to advertise TIDs to attract a broader range of applicants as a key goal moving forward.

Update on QPs revision work

DC provided an update on the QPs revision work, referring back to the last update given at the spring TAC meeting. DC reported that the latest versions of the RFs had finally been received last week, though there was uncertainty about their final status. DC noted previous correspondence from the EA explaining a delay in proceedings due to a court ruling classifying poultry manure as waste, requiring a review of their internal documents. No timeline for this review was available.

KN commented that the presumption had always been that poultry manure was waste, so the court ruling was seen as a lengthy process to confirm something already understood. KN added that amending the position statement, which says digestate, manure, and slurry are not waste, was on the radar. This related back to the RF's assertion that these materials are soil and crop inputs, with a requirement to demonstrate soil and crop need.

LM added that the ruling was more a clarification than a change, confirming chicken manure could be waste, which placed more responsibility on regulators to verify details. JC clarified that the distinction was between industrial waste and agricultural waste, a nuance relevant to some positions.

KN explained that chicken farming was considered an industrial process, and exemptions allowed manures and slurries to be used if done sensibly and not merely disposed of. The court ruling had prompted the legal team, including Richard Fairweather, to review the matter carefully, causing delays in publication. DC affirmed that the legal team was still reviewing, and Richard was awaiting their final approval. They hoped for no changes.

KN shared that unless producers demonstrated a need for the material and compliance with all tests, the ruling remained relevant. Richard had updated DESNZ the previous day, confirming readiness for publication since December. KN expressed frustration at the delay and speculated on the risks of publishing before the ruling. The legal team was being cautious due to pressure from action groups.

DC reported that between the October draft and the latest version, section 3 (defining when material is not considered waste) had been rewritten to be more specific about end-of-waste tests and timing. The key change was clarifying that compliance with all requirements meant waste controls no longer applied once material was dispatched to the end user.

JC noted that operators had raised concerns about the term "point of dispatch," particularly regarding interim off-site storage - whether it meant leaving the site regardless of destination or only when going to the end user.

KN explained that this depended on the Nutrient Management Plan (NMP). Material taken to storage without an intended use for 12 months or indefinitely would still be considered waste, as dispatch without certainty of use did not meet end-of-waste criteria. The NMP was key to demonstrating planned use, for example, spreading later in the year.

JC added that if material was stored in August without clear plans for the next season, evidence of a plan for the following year was needed. KN noted that farmers typically had an idea of their intended crops. JC responded that operators sought clarity on dispatch definitions and welcomed more precise guidance. DC confirmed that NMP requirements had been expanded and made more prescriptive in the

new drafts. DC outlined next steps, including plans to hold two webinars (one per scheme) for all scheme participants. An email had been sent in March to gauge interest, and GK and JC were asked to notify interested participants.

DC said that with the RFs now available, documentation and webinar content revision would begin. One more Task and Finish Group meeting was expected to understand the process and next steps for EA publication, though the meeting was not yet confirmed.

Feedback from both fora on high-level changes had been received, especially regarding the reasoning for dispatch as the endpoint and the need for clarity on Wales and NI's plans to adopt the RFs.

LM commented that little could be done until EA published the RFs. The issue was on the governance agenda in July to decide a way forward. Wales might not adopt the RFs at all, might use the QPs, or adapt the RFs due to differing agri-pollution controls. A formal position statement and stakeholder communication through existing channels were anticipated. LM speculated that departing from the QPs or RFs entirely would be unusual, expecting some adaptation of the RFs instead.

KN noted the difficulty of diverging significantly given cross-border movement, citing the Hereford-Shropshire border as an example. LM added that differing approaches would complicate enforcement for officers but that resource constraints due to staff losses might limit adaptation options. Communication through REAL to scheme participants was considered essential.

DC reiterated understanding of a six-week period between final version release and publication. They awaited confirmation of a final T&FG meeting. When asked, KN stated that they had no additional information to add regarding the T&FG meeting.

Update from the Certification Bodies

NJ reported that there was nothing significant to highlight from their side. They had received one producer complaint under CCS since the last TAC, which was formally investigated and resolved. The complaint was linked to a local opposition group attempting to challenge compliance and cause disruption. NIEA was involved and satisfied with the resolution.

DR stated they had one issue ongoing for approximately 18 months involving a producer who had used a product that was not classified as an acceptable waste; thus, the material was deemed waste. This issue had now been resolved.

RL confirmed there had been no complaints since the last TAC. RL also noted the addition of Claire Eden as a compost inspector and that a new Certification Officer had joined to shadow RL with a view to taking over after RL's eventual retirement.

Update from the Approved Laboratories

SP reported that samples had occasionally arrived on Fridays either poorly labelled or without properly frozen ice packs; however, these were considered isolated and low-level incidents rather than indicative of a widespread problem. There had also been instances of incorrect certification codes being used.

Both laboratories had experienced slightly longer turnaround times recently. An increase in demand for PAS 100 compost tests had been noted. Both laboratories continued to participate in the test method

working group reviewing the PC&S test method, which remained highly anticipated, with hopes for progress.

DR added that efforts were underway with CCS/BCS to improve the visibility and clarity of the certification code to reduce instances of incorrect usage.

Update from the CCS Producers' Representative

GK raised a query from a producer who had experienced difficulty during an audit in demonstrating that their internal audits were acceptable. The producer had inquired whether bespoke training was available to support internal audit practices. GK assumed the critique stemmed from someone auditing their own work and sought views on this issue.

GP responded that internal discussions were ongoing regarding whether REAL or REA could offer such training, though no decision had yet been made. An update was expected at the next forum meeting. In relation to consultants auditing their own work, GP confirmed the matter had been discussed with Certification Bodies during the monthly meeting. UKAS did not set a specific timeframe for when QMS authorship is considered to have changed; it required a subjective call. CBs were reviewing acceptable boundaries, with some differing views. A position on technical requirements would likely be published in due course to provide clarity for producers.

GK raised a second point regarding the potential for early indicators of Plant Response Test failure. A producer had suggested the possibility of identifying warning signs early in the process, potentially through something akin to the RBP early indicator.

TA explained that the VFA test in PAS 110 functioned as an early indicator for RBP, and while PRT is a 28-day test, interim results could be provided during the testing period. It might be possible for producers to request early information from the lab. SP added that the query might relate to identifying which specific test could indicate early PRT failure. While the VFA worked for RBP, an equivalent for PRT was less clear.

GK suggested parameters like extreme pH or EC might serve as early indicators, as the producer in question had experienced a significant failure and might have addressed the issue earlier if forewarned.

SP confirmed that interim reports could be provided, but the laboratories would need to know which parameters producers found most useful.

KN noted that a similar discussion had occurred concerning PAS 100, particularly around pre-screening for toxicology, though it had proven difficult to define suitable methods.

TA agreed that the complexity of factors involved made early failure prediction difficult. However, if producers requested interim PRT results, such as 10- or 14-day germination data, this could indicate a potential failure early on.

GE mentioned that Hub Project 4 was investigating the PRT test and might eventually lead to alternative methods that could serve as earlier indicators, avoiding the full 28-day tomato plant period.

GK then raised a query regarding the requirement for the waste label to remain until there was certainty of dispatch. Producers were concerned about potential operational impacts, particularly when storing product in areas unsuitable for material that still held waste status. Questions were raised around whether PAS 100 aligned with PAS 110 in situations where products were awaiting dispatch but

without specific order details. Some producers had argued that, even when markets were known, quality and destination often remained unknown until shortly before dispatch.

KN responded that if there was no intended market at the time of storage, the activity could be interpreted as waste disposal. The key principle of achieving end-of-waste status was that there should be a suitable market and end use. However, if producers could demonstrate consistent relationships with regular farmers - even without specific values, this could potentially be acceptable as a form of EoW achievement criterion.

GK reiterated that if material sat on site for any significant time, it would still be considered waste.

KN expanded that material released under a specific specification that then remained stored for a year would likely no longer meet its original specification, breaching both scheme and RF requirements. She noted that in some instances, farmland had been repurposed to store digestate, which resembled landfill operations. Many AD plants were not built with sufficient storage, and digestate posed specific challenges due to its continual production. She cited several sites without NMPs or contingency planning, stating that the change aimed to test the robustness of markets. Large volumes of digestate were going unaccounted for in nutrient-saturated catchments, undermining the intent of the RFs.

GK asked whether similar issues occurred with compost. KN responded that compost was less problematic due to its fibrous nature, slower nutrient release, and more established markets.

GK raised concerns regarding laboratory issues, citing producer feedback shared with GP. These included late sample results, lack of interim data, and uncertainty about whether NRM still subcontracted pathogen testing. SP confirmed that NRM still subcontracted pathogens and explained that the subcontracting process was tightly controlled.

GK added that GP had mentioned Eurofins was hiring more staff, and this might explain recent issues as a temporary situation.

DR shared a recent issue from a local authority composting member. Their internal procurement protocol required three quotes for laboratory testing, but with only two approved labs available, they were unable to proceed. The requirement had prevented further work. SN confirmed that auditors were required to sign off on three quotes as part of the process.

AM later in the meeting suggested it might be helpful to issue an official letter confirming that only two labs were currently approved to carry out this work. This could support LAs facing procurement hurdles.

GK concluded by noting the strong desire among producers for additional approved laboratories.

Update from the BCS Operators' Representative

JC raised ongoing laboratory issues. These included new sites receiving RBP non-response results and several operators questioning the feasibility of PTE test results (e.g. for Hg, Ni, Cr). JC asked how trends across several operators were identified and considered.

JC explained there was general concern among operators about PTE sample analysis, with multiple failures recorded across a wide range of parameters. There had been complications, including a breakdown in NRM's equipment. Even prior to the breakdown, there had been issues with result reporting. One operator received an email with issued results that were later withdrawn and replaced with updated versions. Following the breakdown, NRM subcontracted samples to Eurofins. One

operator experienced failures on mercury results during a period when Eurofins had suspended their UKAS accreditation. This operator expressed strong concern about the reliability of the testing process.

The operator, producing large volumes of digestate with a 50-day hydraulic retention time and a 30-day sample period, had sampled twice within the same batch and received highly inconsistent mercury results — one showing a spike and another falling back to zero. They saw no incremental change, which further eroded their confidence.

Another operator reported a spike in chromium levels they believed was implausible. The spike disappeared again within the same batch. JC added that they personally had seen increased mercury levels at two sites, where results had previously been below detection, again with no gradual change but a sudden spike and return to zero. Another operator had resampled the same batch and received completely different results, undermining trust further.

JC noted that while none of this would be new to SP, the key point was whether some form of trend analysis could be introduced to assess the bigger picture. Operators currently only had access to their own results and could not see broader patterns. They were often reluctant to raise formal complaints with laboratories to avoid damaging relationships and would prefer to receive investigation reports outlining what had occurred and what changes were being made.

JC highlighted that no clear process existed for customers to access wider testing trends across the scheme and reiterated hope that new laboratories would soon be approved.

SP acknowledged the discussion and noted that under the scheme rules, all laboratories must be UKAS-accredited. Labs conduct their own quality control checks — this internal trending must stay within certain control limits. While it was unfortunate that the same sample couldn't be tested under the same conditions, Proficiency Testing (PT) schemes existed to compare inter-laboratory performance across the PAS testing suite. Having this requirement within the accreditation framework aimed to maintain consistency across laboratories.

TA confirmed this would be addressed under the technical issues section of the agenda.

JC raised that, at the time of the PTE equipment breakdown, an operator had asked the lab for a summary of the investigation to understand why the failure occurred and what actions were being taken. Referring to email correspondence between the operator and the lab, JC queried whether an investigation had taken place to assess if the breakdown could have been prevented. Operators were surprised that no formal investigation appeared to have occurred, given that operators would typically conduct an investigation into similar failures on their own equipment.

SP responded that more actions were likely being taken than had been communicated. Improving equipment reliability and engaging in continuous improvement were key priorities, but clearer communication was needed.

JC remarked that it felt like “death by a thousand cuts” for operators. They needed something to present during audits to show they had followed up on the issues. Receiving vague responses from labs was not reassuring. JC believed some aspects of the failure may have been preventable and improved communication from labs would help alleviate concerns.

JC added that RBP non-response results continued to occur, even for new operators who had not encountered this issue before. JC thanked the scheme for formalising a pathway to deal with such results, which was much needed.

JC noted a comment regarding the ongoing review of lab analysis methodologies. A question had been raised about the new plastic thresholds in the Interim RFs and whether the method review would distinguish between biodegradable and non-biodegradable plastic. JC asked whether the working group reviewing the method would address this.

TA responded that many issues needed addressing before this specific point could be considered. The working group would review both PAS compost methods. The standards currently did not require distinction between plastic types, but it could be a matter for future work.

JC concluded by mentioning the issue of chicken litter as industrial waste had already been discussed and had no further updates to raise.

GP noted that the upcoming technical issues section would further explore the possibility of trend analysis across the BCS dataset. However, there were concerns about whether the dataset was sufficiently robust to support scheme-wide reporting.

Technical issues

TA provided an update on the mercury issue, noting that this also relates more broadly to PTE analysis.

The TAC previously advised that ICP-MS can be used for PTE analysis. Following this, the scheme introduced a requirement for matrix-specific UKAS-accredited PTE analysis, which has functioned well over the last four to five years. While operators value this approach, many are keen to have more choice of labs. Due to the challenge of sourcing UKAS matrix-specific testing, the schemes explored the possibility of allowing a limited number of samples to be analysed by non-UKAS laboratories.

This exploration coincided with an instrument breakdown at one of the approved labs, followed by issues with a replacement instrument that arrived damaged. Although the two approved laboratories use different types of ICP instrumentation (ICP-OES and ICP-MS), both methods are permitted under the schemes and have achieved UKAS accreditation.

TA noted that the approved laboratory which experienced the breakdown is currently validating a second instrument, which will improve overall robustness. From the scheme's perspective, efforts are ongoing to establish backup contract laboratories. However, sourcing subcontractors for PTE analysis in digestate continues to be difficult. TA reported that one additional laboratory has recently undergone its initial assessment by an auditor, and the scheme is currently awaiting the outcome of that audit.

TA also addressed the Proficiency Testing programme, stating that the scheme is aiming to balance robustness with laboratory capacity and operator choice. A move towards a PTE PT programme is being considered. Additionally, a forthcoming revision of the lab T&Cs may adopt an approach more in line with the pathogen testing model, in which all participants are enrolled in a shared PT scheme. This shift could help provide some of the wider trend data that JC referenced earlier in the meeting.

No questions were raised.

AOB

No AOBs were mentioned, the meeting adjourned early.

End: 2.30 pm

Actions:

- SEPA to send new EoW positions directly to CCS/BCS
- CCS/BCS to share safeguards introduced in response to the E. coli issue and investigation with producers at the forum meetings in winter
- CCS/BCS to share update with the EA on the next PAS reviews when a decision has been taken
- AM to send KN the relevant QMS contact details/weblink relating to risk assessment guidance
- CCS/BCS to circulate final draft TAC minutes for comments and referencing as soon as possible
- TAC to read through information captured in minutes around nutrient management plans and raise any further queries with KN and CCS/BCS by email if any expectations or requirements are still unclear
- TAC to consider volunteering to join steering groups assembled for new Research Hub projects
- TAC to email GE or Jackie Robinson if interested in steering group membership for digestate screening project, tendering opportunities, or to learn more about the project
- TAC to read through information captured in minutes around interim storage and end-of-waste status and raise any further queries with KN and CCS/BCS by email if any expectations or requirements are still unclear
- CCS/BCS to discuss with the approved labs the feasibility of sharing early indicators during PRT testing to help predict potential failures
- SP to discuss effective communications with the team, highlighting to operators the work being undertaken in the background to investigate and rectify issues
- CCS/BCS to consider producing an official letter for LAs confirming that there are only two approved labs
- CCS/BCS to report back from TMRWG whether compostable/biodegradable plastics will be distinguishable
- CCS/BCS to later confirm whether PAS 110/100 test result datasets can be used for trend analysis in the event that operators challenge test results