

# Case Studies

## Product Complaint Investigations

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### Outcomes of investigations

Investigations carried out by the REAL CCS Certification Bodies into the complaints made against CCS producers/products have delivered valuable results. The outcomes of these investigations are instrumental in the evolution of the industry and the encouragement of operators to improve their composting processes and the quality of the composts they produce.

### Case study no. 1

Compost purchased by a customer was found to be heavily contaminated with plastic. An investigation was conducted by the producer's certification body and the environmental regulator was informed. A new supplier had been supplying contaminated feedstock material and the producer had not adjusted their QMS or process to cope with this change. After certificate suspension, the producer implemented the necessary corrective actions and eventually their certificate was reinstated. For more information about this complaint, you can download the anonymised Product Complaint Investigation Report Form [here](#).

### Case study no. 2

Compost with 'waste' status was illegal dumped. The complaint was received by the CCS certification body in October 2016 and an investigation commenced immediately. However, it was revealed that the complaint related to material uncovered in summer 2013. A short notice/unannounced inspection was due to take place but the site had since been audited three times and there was no evidence to indicate that the site was a persistent offender. The investigation was completed within a short timeframe but the certification body was confident that the complaint/issue had been resolved. For more information about this investigation, you can download the anonymised report form [here](#).

### Case study no. 3

Growing medium purchased by a customer was found to be contaminated with high levels of herbicide residues. REAL conducted an investigation to discover if the growing medium contained PAS100 compost contaminated with herbicide residues. The manufacturer claimed that the product contained PAS100 compost and the issue had already been raised. The customer was able to contact the manufacturer for a full refund but it was not possible to fully investigate the complaint because REAL could not obtain the producer's details. For more information, you can download the anonymised report form [here](#).

### Case study no. 4

The Environment Agency received complaints from members of the public about plastic believed to be spread to land through compost. The PAS100 compost producer's certification body commenced an investigation and carried out inspections at both compost sites implicated but the inspector found very low levels of contamination in the finished compost at both sites. The producer had implemented corrective actions in response to the complaint and spot samples were sent for testing after the inspector witnessed the samples being taken by site staff. The reports came back with positive results and the certificate was not suspended or withdrawn. You can download the anonymised Product Complaint Investigation Report Form [here](#).

### Case study no. 5

A contractor began spreading compost certified to PAS 100 onto farmland but was unhappy with the levels of plastic and metal contamination so ceased application. The remaining 300 tonnes was reprocessed at the composter's site after the farmer requested it to be removed from their property. A complaint was raised with the certification body and an investigation commenced with the environmental regulator notified. The auditor conducted an investigative audit on site and an investigative visit at the complainant's farm but the certification body was unable to prove that the batch was not produced to the PAS 100 specification. The best available evidence had been removed. The investigation was inconclusive but there were many lessons learnt from this complaint investigation. You can download the anonymised Product Complaint Investigation Report Form [here](#).

### Case study no. 6

The operation of a compost site had been reported as disorderly and haphazard. The complainant, who delivers green waste to the site in question, noted that since the resignation of the site manager, the day-to-day operation of the site has deteriorated and there appears to be little supervision. The complainant observed that the site is covered with litter and doubts whether anyone at the site holds a licence. The complainant contacted the Health and Safety executive who redirected the complainant to the local council. The council could not help in this instance. The relevant Certification Body arranged for an urgent spot inspection to take place. REAL and the environmental regulator were informed of this arrangement. To ensure that the correct person was present, the site was informed two days prior to the investigation taking place. The inspector noted that the site was clean and tidy and appeared well-managed. The complaint was signed-off by the relevant Certification Body. You can download the anonymised Product Complaint Investigation Report Form [here](#).

### Case study no. 7

A farmer expressed concern about a fire and the subsequent odour detected from a compost site. The farmer stated that the odour issue had been ongoing for five days; the farmer had livestock grazing nearby. The complaint was discussed internally by the relevant Certification body and it was decided that a spot inspection would be undertaken. Upon completion, the spot inspection form was assessed, and a compliance notice issued. The inspection revealed that the fire was present on a farmland manure heap upwind from the compost site under investigation. The heap had been soused with water but was still smouldering at the time of the inspection. The local parish council had been made aware of the problem via the composter; the composter informed the farmer that the smoke was having a negative effect on their staff. The inspector was satisfied with the quality of the compost seen at the site in question – there were no fires detected. REAL and the environmental regulator were informed of the result of the spot inspection; the latter alerted to tend to the remains of the fire. The complaint was signed off by the relevant Certification Body. You can download the anonymised Product Complaint Investigation Report Form [here](#).

### Case study no. 8

A customer suspected that compost purchased caused detriment to their lettuce crop. The customer believed the compost to be PAS 100 compliant. The complaint was reported on the 22 October 2018 and the investigation began immediately. The investigation revealed that the delivery note supplied with the compost did not claim that the material was of an assured status or grade; the supplier provided evidence which demonstrated that the product was sold as a waste material. The Producer's certificate was not suspended as the product in question was a waste material and not a PAS 100 certified product. However, the certification body inspectors were asked to request more information

on site regarding small sales of product compost or waste compost. For more information about this complaint, you can download the anonymised Product Complaint Investigation Report Form [here](#).

### Case study no. 9

It has been reported that a farmer rejected a batch of compost as a result of contamination. The recipient perceived the compost to be heavily laden with plastic and stated that they will no longer be purchasing compost from the company. The Environment Agency site officer was informed and subsequently contacted the compost recipient. Despite the concern over quality, the farmer had spread the compost to land and therefore it could not be sampled. The complaint in question was investigated at a spot inspection whereby a witnessed sample of the affected grade was taken. The composters' certificate was suspended and provisionally reinstated subject to a sample pass. The sample tested returned a pass for the Potentially Toxic Elements (PTE) and physical contaminants parameters. You can download the anonymised Product Complaint Investigation Form [here](#).

### Case study no. 10

The supply of compost to a farm was suspected to be contaminated with glass and plastic. The complainant was contacted, and further information was sought regarding the spreading of the compost. The compost in question was not intended to be spread until spring 2020. The site producing the compost had an upcoming inspection scheduled; the complaint was investigated at this inspection. As part of the investigation, an independent sample was taken from the field site and sent to a PAS 100 laboratory for testing. The Operator was made aware of this prior to the investigation through the issue of a Compliance Notice. The test results from the laboratory revealed that the sampled compost adhered to the PAS 100 limit for physical contaminants. The complaint was signed off by the relevant Certification Body. You can download the anonymised Product Complaint Investigation Form [here](#).

### Case study no. 11

An individual deduced that 20 varieties of their vegetables were spoilt as a result of PAS 100 compost application. The complainant suspected that the product contained residual (amino) pyralid weed killer and concern was expressed over the absence of a batch report from the supplier. The relevant Certification Body was notified and after carrying out initial investigations, felt that a spot-check at the site was necessary. The site was informed of the date of the spot-check 48 hours prior. The auditor focused on several key areas; input material, delivery/dispatch notes, staff training, visual inspections of the on-site compost, and a review of the test results from the batch in question. The investigation concluded and no reasons were identified for why the compost supplied could have caused growth issues with the complainant's vegetables. The site had retained the dispatch notes and the assessor was happy with the quality of the compost available on the day of the audit. As a result, the producer's certificate was not suspended, nor withdrawn. It is important to note that, since the compost in question was an additional grade, it was not subject to the plant growth test. You can download the anonymised Product Complaint Investigation Form [here](#).

### Case Study no. 12

A complaint was raised by one of the environmental regulators following a spot check carried out by their local officer. Following on from this there was concern regarding the product status of the compost produced on the site and regarding potential contamination of product and input material through run off from other operations. The certificate was suspended and only reissued once the member had submitted mitigating actions and a plan for how these would be implemented long term. You can download the anonymised Product Complaint Investigation Form [here](#).

### Case Study no. 13

Oduor complaints were made by neighbours of the process site, these complaints were then reported to the CB by members of the composting process organization. The odour was a result of gypsum residue on recycled plasterboard paper, reacting with the compost and giving off Hydrogen Sulphide gas. The composting of this plasterboard was a prohibited input with waste code EWC19 12 01. After a Risk based spot check (RBSC) and full CCS PAS 100 audit, the member was deemed to have taken suitable corrective actions. However, the member was informed that all compost that included the prohibited plasterboard would not meet PAS 100 standards and would have to be disposed of as waste. They would not however, be suspended. Ultimately the compost producers' responsibility to know and correctly apply all rules and regulations to the inputs they receive. You can download the anonymised Product Complaint Investigation Form [Here](#).

### Case Study no. 14

A complaint was raised by an environmental regulator regarding compost material spread on farmland. The regulator noted that the material, supplied by a CCS-certified compost producer, did not appear to meet PAS 100 standards. The producer's certification body investigated and reviewed delivery records, which showed that 50% of the compost dispatched to the site had undergone lab testing and met the required specifications. Additionally, the producer had recently passed a CCS renewal audit with no non-conformances, and all compost on-site was deemed compliant. The complainant visited the producer's facility and confirmed that the material seen on the farmland was unlikely to have originated from their site. No further evidence was provided, and the investigation concluded with no substantiation of the complaint. The certification body closed the case, noting similarities to an earlier incident involving suspected illegal waste spreading in the area. You can download the anonymised Product Complaint Investigation Form [here](#)