

CCS Newsletter July 2025



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Keep up to date: News and Guidance

As a reminder, our **News** and **Guidance** sections on the CCS website are both regularly updated throughout the year. News covers scheme announcements, regulatory developments and upcoming events, while Guidance hosts our library of practical notes on topics such as sampling, labelling, and End-of-Waste requirements.

Both pages are worth checking back on regularly as content is added and refreshed.

CBs reappointed under new contracts

Following a productive 2025, CCS is pleased to announce the successful conclusion of the Certification Body tender process.

We received five tenders in total, all of which underwent a rigorous evaluation by the CCS team. This

CCS Producers' Forum and TAC

The second Producers' Forum for 2026 met on Tuesday 12th May, followed by the Technical Advisory Committee on 25th June). These meetings remain our primary vehicle for ensuring that the questions, feedback, and requests of compost producers directly inform technical and regulatory discussion at the Technical Advisory Committee.

Our 2025 annual participant survey, with responses reviewed this year, continues to underscore the importance of the Forum. One respondent noted that they "always have a positive outcome from any webinars or forums hosted by CCS."

During the recent forum, producers queried the scheme's draft position on whether a consultant who has authored or updated a site's Quality Management System can later carry out that site's internal audit, noting this activity is particularly difficult for smaller sites without independent, competent staff. At the TAC, stakeholders considered three possible interpretations of the relevant PAS clauses, to inform a revised scheme position. Support was recorded for an interpretation that treated the internal audit as a check of day-to-day operational compliance with the QMS, rather than an assessment of the QMS's design, meaning a QMS-author would not, on this reading, be auditing their own work. However, we are currently seeking final comments, so will conclude the TAC discussion over the next several weeks. Wording is being finalised to apply generically rather than referring specifically to consultants, with a formal position expected to follow before the end of July.

A request was made that laboratory reports be restructured so PRT pass/fail results appear clearly on the summary page 1 to aid with quick assessments of overall pass/fail status. This suggested development was reported to the TAC; CCS and BCS will consider and respond at the next Forum.

Finally, producers sought clarity on the rules for producing non-PAS material alongside certified PAS compost at the same site. This was raised at the TAC, where CCS confirmed the relevant scheme rules remain under active review with UKAS, with an update to be shared later in the year, while the Environment Agency confirmed that co-location is acceptable in principle, provided a site maintains robust physical separation and controls to prevent cross-contamination.

Looking ahead, the CCS will be holding its next forum in October 2026. We would love for you to join us - more details on the exact dates will be communicated this August in our CCS Bimonthly which will be sent to all scheme participants.

comprehensive review process involved detailed Q&A sessions and formal interviews, ensuring that the selected bodies continue to meet the high standards required to uphold the integrity of the scheme.

The quality of the submissions was high, and we are delighted to report that all incumbent CBs presented excellent tenders and were re-contracted at the start of the year for the new term.

Test Method Working Group

The REAL TMWG has completed its first project and published a final summary report. The project focused on revising the Physical Contaminants & Stones (PC&S) test method for compost, in part given the lower plastic limits introduced in the Compost Resource Framework (England) and End of Waste position GN022 (Wales).

Following a stakeholder consultation in late 2025, the TMWG agreed on three key technical changes to the CCS PC&S method: standardising the cleaning of contaminants prior to weighing using a soft bristle brush to ensure more accurate mass measurements; increasing weighing precision from 2 to 4 decimal places and reporting to 3 decimal places to provide better resolution for the reduced plastic limits; and introducing a multi-person confirmation process for identifying sharps to reduce subjectivity.

The TMWG is scheduled to reconvene later in the year to discuss further work on plastics testing and other potential projects. The full Project 1 Summary Report is available on the CCS website [here](#).

Annual Report 2025

CCS published its ninth annual report in March of this year, providing an overview of the scheme and a summary of developments in 2025.

New Scheme Documents

Scheme Rules

An administrative update has been introduced for the Compost Certification Scheme rules. This revision applies. No alterations were made to the core text or the underlying requirements of the scheme. However, all scheme participants were required to update their internal records to reflect the updated VCN in relation to scheme rules v9.2. The latest version is available on the CCS website [here](#).

Technical Positions

The CCS technical position document has been updated to ensure continued regulatory alignment and clarity for participants. This revision introduced important updates, notably the addition of explicit references to the End of Waste position requirements specified by Natural Resources Wales and the Scottish Environment Protection Agency.

Additionally, the document has been expanded to include three new sections focusing on training and competence:

- Section 20 outlines the Scheme position on HACCP training.
- Section 21 outlines the Scheme position on PAS 100 training.
- Section 22 outlines the Scheme position on internal auditor training.

The latest CCS Position on Technical Requirements document can be found [here](#) and the marked-up version showing all changes can be found [here](#).

Checklists

The Compost Certification Scheme audit checklist has been revised to ensure continued alignment with Version 9.2 of the Scheme Rules and the updated CCS position on technical requirements document. This updated version introduces specific checks for the new positions regarding the evaluation of training records and competency evidence for HACCP, PAS 100, and internal auditing. The revised checklist can be downloaded from the CCS website [here](#).

We encourage you to view the full report for a comprehensive overview of the schemes [here](#).

Scheme participants to provide feedback on RS 122

Please note if your process is based in Wales and you are utilising RS 122, NRW encourages you to provide feedback, either directly to NRW, or to REAL via your Certification Body, on any issues you are experiencing in working towards meeting the reduced plastic limit. If you consider that an extension would be needed beyond the current December 2026 withdrawal date for RS 122, please detail the reason(s) for this.

Providing this information is entirely voluntary and will not affect your certification. This is purely to gather scheme-level insight into RS 122 usage.

Simpler Recycling reforms

In 2025, the Simpler Recycling reforms were introduced in England for businesses and other non-municipal premises. These reforms standardised the collection of recyclable materials and, most notably, introduced a mandatory weekly food waste collection.

From 31st March 2026, the reforms were extended to households, with local authorities across England now required to provide weekly food waste collections. Rollout has been irregular in the short term: roughly a quarter of English councils are operating under transitional arrangements, while they secure funding, vehicles and depot capacity. Coverage should continue to broaden over the coming months and years as these arrangements resolve.

The CCS expects the majority of this additional food waste to be sent to anaerobic digestion, which remains the preferred method for recycling organic waste. However, the reforms also allow for the co-

New T&Cs issued for Approved Labs

CCS issued **Version 10 of the Terms & Conditions** for Approved Laboratories after consultation with the labs and CBs, which came into effect in January 2026. The most significant update is a shift in how laboratory performance is monitored. While assessments against the T&Cs were previously conducted by independent auditors on behalf of the scheme, these audits are now conducted directly by CCS using internal processes. This change is designed to provide the scheme with greater oversight of laboratory performance and technical competency.

To further strengthen the reliability of test results, the 2026 T&Cs also introduced stricter requirements for Proficiency Testing. Laboratories are now required to participate in a specific PT programme, the Wepal MARSEP programme, for Potentially Toxic Elements. Laboratories must now share records of any investigations or corrective actions resulting from these proficiency tests directly with CCS. These measures ensure that any technical issues are identified and resolved promptly, maintaining the integrity of the data used for certification.

The new T&Cs also introduced formal timescales for complaint handling. Laboratories are now required to acknowledge complaints within one week and provide regular progress updates for any ongoing issues. These changes aim to improve communication between operators and laboratories, ensuring that any concerns regarding testing are addressed transparently and efficiently.

All CCS Approved Laboratories and their subcontractor laboratories have now been audited for 2026 against the latest version of the T&Cs. All labs continue to meet the requirements and remain approved to carry out testing for the Scheme.

mingled collection of food and garden waste, and a number of local authorities have opted for this approach. As a result, compost producers operating In-Vessel Composting facilities may see an increase in available feedstock in certain areas as household collections increase.

Ultimately, the aim of the reforms is to improve the quality of material supplied to certified composters. With significantly reduced contamination, this should lead to the production of higher-quality certified compost.

The CCS continues to evaluate the Scheme's operational capacity to ensure that any increase in certified materials can be managed effectively as the household rollout beds in.

The Circular Economy Growth Plan (formerly the Circular Economy Strategy)

In November 2025, it was announced that publication of the Circular Economy Strategy, since rebranded as the Circular Economy Growth Plan, had been delayed, with an updated release date expected to be confirmed.

In May 2026, over 50 businesses and trade bodies wrote to Defra urging publication without further delay. As of a Parliamentary written answer on 15th June 2026, Defra confirmed its intention to publish the Growth Plan but has not yet set a firm date. We will share the confirmed date as soon as it is announced.

During the second half of 2025, the CCS carried out extensive engagement with members of the Circular Economy Taskforce, with a particular focus on the Agri-Food workstream; one of the five priority areas identified by the Taskforce as having strong potential to develop circular economy models.

Our aim was to highlight the role that standards and certification can and ought to play in developing a circular economy. Through these processes, manufacturers, producers and

SEPA position implementation

In Scotland, the Scottish Environment Protection Agency (SEPA) updated their EoW position for compost, titled '**WAS-G-DEF-06**', last year. This document replaced the previous position and sets out updated EoW criteria for compost. To reflect this change, CCS Scheme Rules Annex 4 was updated accordingly. The latest version of the SEPA position can be found in Scheme Rules version 9.2, available to download from the CCS website [here](#). Audits continue to be conducted against the new EoW position and CCS Scheme Rules.

consumers alike can have trust that certified products behave in the way they're supposed to, and that there is sufficient transparency in their production and disposal.

The CCS continues to await publication of the Growth Plan and its accompanying sector roadmaps, which will set out the future direction of travel for the organics industry.

UK FPR consultation update

In June, the CCS responded to Defra's consultation on the UK Fertilising Products Regulation (FPR), which sets out proposals to reform fertiliser regulation across the UK and considers how compost and digestate might be brought into scope.

A central part of our response emphasised the existing quality assurance architecture of the CCS; noting its legacy of efficacy, demonstrable consistency, and strong working relationships with stakeholders from industry and regulators.

The consultation noted that an evidence base would be needed to support the inclusion of compost with the FPR scope. Our response highlighted that the CCS provides that evidence base through a substantial body of technical and test report data demonstrating both the reliability and quality of certified quality compost and the processes that produce it.

NRW position implementation

In late 2025, Natural Resources Wales published a new End-of-Waste position for compost, 'GN022', which aligns closely with the Resource Framework introduced in England. Alongside this, NRW issued RS 122, which introduced a transition period for meeting reduced plastic limits, valid until December 2026 (unless withdrawn sooner). Unlike the registration process in England, RS 122 applies automatically to processes in Wales. CCS Scheme Rules Annex 2 was updated accordingly and can be found appended to Scheme Rules version 9.2, available on the CCS website [here](#). Audits continue to be conducted against the new EoW position and CCS Scheme Rules.

Environmental Regulator Liaison Meetings

Two productive liaison meetings took place between the CCS, the Renewable Energy Association (REA), the Environment Agency, and Natural Resources Wales across June and July. These ad hoc sessions provided a valuable space to discuss a range of technical and administrative matters, including scheme rules processes, the progress of the Research Hub's risk assessment project in relation to the upcoming CRF Task and Finish Group meeting, and queries regarding the interpretation of CRF requirements. Our discussions focused heavily on collaborative working, particularly around upcoming document reviews and the Research Hub risk assessment report.

The meetings demonstrated continued positive engagement with both regulators, which will be maintained through the upcoming Biowaste Regulatory Forum and the Task and Finish Group meetings for the resource frameworks. We were informed that the first T&FG meeting is likely to take place over the next few months, and the CCS will be represented on this group.

CCS Research Hub

The Hub and the Resource Frameworks

With the publication of the EA's interim Compost and AD Resource Frameworks (CRF and ADRF) last autumn, it is an exciting time for the organics recycling industry. The Research Hub exists to help producers and operators by commissioning projects which inform regulatory reform, promote the sector, and foster innovation and growth. The Hub's Project 7 (Risk Assessments) is a direct response to the EA's changing End of Waste Positions and the project timeline has been aligned with the revision window of the RFs in 2026.

Project 7: "Risk assessments to inform the revision of End of Waste Frameworks for compost and digestate"

The aim of Project 7 is to produce Risk Assessments which inform the revision of the CRF and ADRF. Since March 2025 the project team from the global consultancy firm WSP has been working closely with the project steering group, which comprises representatives from industry and the EA. The project has three stages:

1. Gap Analysis

Beginning with the QPs and a 'Hazards of Interest' document compiled for the Research Hub, the project team completed a Rapid Evidence Assessment (REA) literature review. The review prioritised hazards/hazard groups which have previously been flagged as needing further evaluation, or where new standards or evidence suggest a hazard needs (re)assessment. The review identified a list of hazards/hazard groups which the project team recommended to be taken forward to the Risk Assessment stage of the project, alongside justification for inclusion/exclusion. The project steering group and key external stakeholders (chiefly academics and regulators) were consulted on the list of hazards to be taken forward.

2. Risk Assessment

The project team (in consultation with the steering group) designed 'exposure scenarios' to evaluate the list of hazards against. These exposure scenarios consider realistic, potential high-risk pathways for human and environmental contamination and encompass the composting and AD processes from feedstock to End of Waste. Hazard and exposure assessment form part of this stage of the project: critical thresholds and parameters for priority hazards were defined, alongside estimates of human and environmental exposure. Hazard and exposure assessments were combined to characterise risk for each scenario.

3. Project Finalization

The findings of the completed risk assessments were synthesised into a risk matrix, alongside reporting on key conclusions, areas of remaining uncertainty, and recommendations for acceptable use/ risk management. The draft report is currently being peer reviewed to assure the quality and robustness of the findings. The final draft report

will be presented to the steering group in time for the EA's revision of the RFs.

The Hub and the Plant Response Test

The Hub has two projects ongoing which aim to improve the CCS Plant Response Test (PRT): project 4, "Plant Response Test Interpretation and Comparison", and project 10, "Alternative control growing media for REAL CCS plant response tests". Both of these projects have had exciting developments in the last few months.

Project 4 compares spring barley and tomato plant responses using the PRT methodology. Spring barley is quicker to germinate than tomato, and so could potentially offer a quicker alternative to the current tomato-based PRT. The plant growing trials for this project have concluded, and both labs are now providing data on the spring barley and the concurrent tomato plant trials which were conducted for the Hub study.

Biomathematics and Statistics Scotland (BioSS) have begun to analyse the project data. BioSS is an internationally-recognised centre for quantitative modelling in agricultural and environmental sciences. The resulting analysis from this Hub study will improve the rigour of the PRT.

Project 10 aims to find a peat alternative for use as the control growing medium in the PRT. Reducing the use of peat on the CCS aligns with the Scheme's circular economy and carbon reduction principles, as well as anticipating regulatory constraints on peat extraction. The Hub is excited to be working with the Stockbridge Technology Centre on this project. STC brings highly-relevant industry knowledge, and has already identified suitable raw materials for testing, such as coir, fine bark, fine woodfibre and professional seed compost products from a range of growing media manufacturers. Individual mixes and blends of materials will be analysed by STC and participating labs, and at future stages of the project, the shortlisted peat alternatives will be mixed with composite green compost samples as per the standard PRT method.
