

Compost Certification Scheme Producers' Forum

Minutes for the meeting on Tuesday 12th May 2026

Attendees

- Jane Hall (JH) (Chair)
- Georgia Phetmanh (GP) (Compost Certification Scheme)
- Oliver Dunn (OD) (Compost Certification Scheme)
- Grace Egan (GE) (Research Hub)
- Gregor Keenan (GK) (Producers' Representative)
- Phil Gray (PG) (Gray Composting Services)
- Georgina Smith (GS) (Hope Farm)
- Angela Cronje (AC) (Roots Organics)
- Jo Fitzpatrick (JF) (Material Change)
- Spencer Welchman (SW) (Yorwaste)
- Stacey Allen (SA) (Wastewise)
- Michael Smyth (MS) (Veolia)
- Bruce Moffatt (BM) (Levenseat)
- Paul Giles (PGi) (Crapper & Sons)
- Daniel Green (DG) (Wastewise)
- James Cooper (JC) (Envar)
- Emma Cheetham (EC) (Elleteq)
- Hannah Johnston (HJ) (Elleteq)
- Samuel Ziki (SZ) (Biffa)
- Tracey Westbury (TW) (Westbury Environmental)
- Katrina Waters (KW) (Envar)
- Francine Powner (FP) (0505 Recycling)
- Sarah Kilkelly (SKi) (KPS)
- Stephen Kay (SK) (FCC)
- Ross Strachan (RS) (Levenseat)
- Peter Upham (PU) (Compost UK)
- Claire Adamson (CA) (SED Services)

Summary of acronyms

ABP - Animal By-Products

ADRF - Anaerobic Digestate Resource Framework

AOB - Any Other Business

APHA - Animal and Plant Health Agency

BCS - Biofertiliser Certification Scheme

CB - Certification Body

CCS - Compost Certification Scheme

CIWM - Chartered Institute of Wastes Management

CRF - Compost Resource Framework

EA - Environment Agency

EMS - Environmental Management System

EoW - End of Waste

LA - Local Authority

NC - Non-Compliance

NRM - Natural Resource Management

NRW - Natural Resources Wales

PAS(100) - Publicly Available Specification (PAS 100)

PC - Physical Contaminant

PC&S - Physical Contaminant and Stones

PRT - Plant Response Test

PTE - Potentially Toxic Element

QMS - Quality Management System

QP - Quality Protocol

REA - Renewable Energy Association

REAL - Renewable Energy Assurance Limited

RPS - Regulatory Position Statement

TAC - Technical Advisory Committee

UK FPR - United Kingdom Fertiliser Product Regulation

1. Welcome

JH opened the meeting at 11:00, welcoming all attendees to the forum.

OD introduced the CCS team to the first-time attendees. OD provided an introduction to REAL and the scope of the forum, before outlining the programme for the day. JH requested that any additional issues producers wished to discuss be raised later in the allocated slots of the meeting.

2. Previous Meeting Minutes

JH led the review of the previous meeting minutes to check for accuracy and ensure formal acceptance by the forum. One correction was identified:

GP noted a small typographical error within the text, clarifying that a statement regarding the submission of two laboratory applications should have specified the BCS rather than the CCS.

Barring this correction, the minutes were accepted.

Action 12 CCS to correct and re-upload the November 2025 forum minutes concerning laboratory applications, ensuring they are recorded as BCS rather than CCS.

3. Updates on the CCS

Actions from the previous meeting

Note: actions in bold are actions from previous meetings, with updates provided during this meeting. Numbered actions are new or on-going actions that are still open.

JH ran the attendees through the actions from the previous forum with updates provided by the attendees of the previous forum.

- **Action: CCS to reconsider holding an in-person Forum in 2026.**

OD reported that the CCS had agreed to reconsider holding an in-person forum in 2026. It was noted that this would likely take place as a winter forum once the recruitment process for the new Policy and Stakeholder Relations Manager was complete. The CCS committed to circulate the details as soon as possible.

- **Action: CCS to raise awareness with the Approved Labs of the significance of reporting within required timescales for pathogen testing for ABP-derived samples.**

OD reported on this action, which had followed previous reports from producers regarding delayed or incomplete pathogen results, including instances where subcontracted facilities failed to return E. coli and Salmonella data within mandated APHA timescales. Operators had previously faced serious compliance risks due to interim reports being issued without pathogen data. OD confirmed that both approved laboratories had responded shortly after the November forum, stating they no longer offer separate pathogen testing or testing via subcontracted laboratories. Consequently, pathogen data will now be reported alongside or prior to the completion of the remaining testing suite. This action was declared closed.

- **Action: CCS to clarify the difference between the "six months reassessment requirement" in PAS 100 versus the "ten months storage limit" in the CRF and whether there is a conflict.**

OD detailed the clarification sought regarding the potential conflict between the six-month reassessment requirement in PAS 100 and the ten-month storage limit set out in the CRF. OD noted that this issue was presented to the TAC and clarified by the EA. The regulators confirmed that no conflict exists as the requirements stem from distinct legislative drivers and operate in separate regulatory domains. The CRF controls the permissible duration for holding material to retain non-waste status, whereas PAS 100 governs quality assessment validity. Clause 10.3 of PAS 100 mandates that compost stored for six months or longer must be re-assessed for compliance with clause 4.2. Therefore, producers are permitted to store material for up to ten months, provided a quality reassessment is performed at the six-month threshold. Reassessment is neither a requirement for, nor a substitute for, the ten-month storage limit.

AC observed that this arrangement seemed unusual. GP clarified that clause 4.2 represents the compost quality clause and requires a reassessment of parameters rather than full laboratory retesting, which can involve communicating with the customer to confirm they remain satisfied to accept the material. JF shared that for material stored on-site over six months, their facility performs a visual assessment for weed growth or wind-blown litter, which is formally recorded. JF

noted that the site is not always accessible, but certification bodies had never raised objections to visual assessments. This action was declared closed.

- **Action: CCS to discuss with the Certification Bodies (CBs) whether producers need to meet separate End of Waste (EoW) requirements in both Wales (currently QP) and England (CRF) when operating/selling product cross-border. One of the CBs informed a producer that it was not possible to meet both which presents a challenge when dispatching compost to England from a process based in Wales.**

OD reported that the matter had been settled via an agreement between the EA and NRW. Both regulators now recognise the respective EoW positions and associated RPSs of each nation when material is dispatched across the Anglo-Welsh border. It was explicitly noted that no changes have been made regarding the England-Scotland border. This action was declared closed.

- **Action: CCS to contact NRW and ask for clarification on the EoW arrangements and cross-border commercial aspects related to their current use of QP and upcoming Regulatory Decision.**

OD confirmed that this corresponding action was completed and resolved under the cross-border agreement detailed above. This action was declared closed.

- **Action: SK to consider emailing NRM to request additional information/evidence regarding the glass/sharps failure, and to provide CCS with an update.**

SK provided an update on correspondence with NRM regarding glass and sharps failures. SK confirmed that a formal letter had been sent to the laboratory, which initially maintained that the glass was sharp. Following a subsequent meeting with the Test Method Working Group, it was established that the material should not be classified as a sharp. SK noted that follow-up emails had been exchanged and NRM is currently addressing the issue. AC asked if a photograph had been requested. SK noted that historically, laboratories had not automatically classified glass as sharps, but NRM had adopted that policy. This action was declared closed.

- **Action: CCS to discuss with NRM the inconsistency in their position communicated to CCS and producers regarding whether glass is always classed as a 'sharp'.**

OD summarised the wider action taken by the CCS regarding the inconsistency in how glass was being classified. While laboratory representatives had previously agreed that sharps should be defined by their physical hazard rather than material composition, this understanding had been slow to filter down to bench analysts, resulting in erroneous failures. The CCS raised this directly during the laboratory audits in March, with the scheme's official position delivered in person by technical adviser Tom Aspray. OD expressed confidence that the recently published PC&S test method revision project, published in January, would resolve future misclassifications. This action was declared closed.

- **Action: Producers to listen to the REAL & REA CRF webinar recording if they have questions regarding CRF implications and significance.**

JH reminded producers to listen to the recorded REAL & REA CRF webinar if they retained queries regarding framework implications. This action was declared closed.

- **Action: Producers to continue raising the issue around vapes in other events or stakeholder groups they participate in.**

An extended discussion took place regarding this action. AC reported finding increasing volumes of vapes, particularly within co-mingled waste streams. JC agreed, noting that vape contamination has become a normal, ongoing challenge across the wider waste sector. JH highlighted that the CIWM and major waste management companies are running a broader campaign focusing on the severe fire risks vapes present at transfer stations and pre-sorting lines. JH suggested that while the sector must manage it, further awareness is required to steer vapes into appropriate e-waste collection streams. JH asked whether the forum wished to rely on the CIWM campaign or initiate something compost-specific.

AC suggested that compiling photographic evidence of vapes in oversize fractions which represent the highest on-site fire risk-would be valuable for inclusion in the scheme newsletter to demonstrate that contamination impacts composting as well as dry recycling. JH suggested exploring an article in *Circular* magazine to highlight this specific angle. JH noted that while vape contamination may not be a direct regulatory issue for REAL, an article could be secured, and raised questions regarding whether leaking or disintegrating vapes posed a risk of process or testing failure. AC noted that due to their small size and density, vapes easily fall through screening gaps. GK emphasised that the primary threat posed by vapes is their status as an acute fire hazard and risk to life, noting that they burst into flames far more aggressively than conventional lighters, which severely impacts operational safety and insurance costs. GK suggested that chemical or heavy metal leaching from a vape would be negligible within thousands of tonnes of material, meaning they pose a risk to the composting process itself rather than end-users. AC noted that consumers understand battery recycling and advocated for a formal deposit scheme for vapes.

JH concluded that integrating compost-specific feedback into the existing sector campaigns would be beneficial, noting that while take-back laws exist for retailers, enforcement remains weak. This action was updated to target photographic gathering for a formal publication.

Action 13 - Producers to send Jane Hall photos of vapes on-site if interested in contributing or writing a 'Circular' magazine article by end of June

Action 9 - Producers to continue raising awareness regarding vape contamination in external events and industry stakeholder groups.

- **Action: CCS to discuss with the CBs and regulators the expectations for auditing if a regulator raises issues around spreading by third-party contractors.**

OD reported that the issue had been evaluated at the November 2025 TAC after a regulator contacted a certification body directly regarding a permitting issue, which was subsequently raised as an audit point without the producer being notified. The scheme participant representative (JC) had proposed that operators should either be included directly in regulatory communications or immediately notified by their certification body. All certification body representatives present at the TAC raised no objections to this procedural request. This action was declared closed.

Any questions on the summary paper?

No questions were raised.

4. Feedback from the last Technical Advisory Committee

GK said that the items from the previous TAC had already been covered in the updates from the previous Forum's actions.

5. Research Hub Updates

GE presented a detailed update on the activities, project statuses, and selection processes of the Research Hub:

Project Selection Process 2026: GE emphasised the critical importance of receiving industry feedback on the current research proposals to determine which should be formalised into active projects. The proposals currently undergoing evaluation from the 2026 intake include:

- A comprehensive scheme audit involving field sampling and comparative analysis between non-PAS and PAS compliant composts.
- A study into feedstock quality, specifically evaluating decentralised fermentation as a pre-processing method ahead of composting.
- A project looking at blending de-watered digestate cake with compost to develop a commercially viable peat alternative for horticulture.
- A BCS-specific proposal reviewing the existing regulatory limits for potentially toxic elements (PTEs) and physical contaminants (PCs) in digestate. GE noted that Stephen Nortcliff would be supporting this work.

Active Project Updates

PRT Comparison Project: Data sharing arrangements for the project comparing standard tomato PRT responses with spring barley are currently progressing, with the project scheduled for completion in Summer 2026.

Project 7 (Risk Assessment): This project is progressing to feed directly into the autumn revisions of the CRF and ADRF, and the final report will be made available to the EA. GE noted that technical queries regarding the underlying model quality are currently being resolved.

Peat Alternatives: This research aims to identify reliable, commercially viable peat alternatives. The project manager is currently negotiating with a new contractor who is proposing an expedited approach. It is hoped that peat will be phased out of control media testing soon.

Newly Selected Project: Contractual arrangements and project management decisions are being finalised for a project evaluating local authority feedstock contamination, with a formal timeline expected shortly.

No further questions were raised by attendees regarding the Research Hub update.

6. Further issues raised with CCS Producers' Representative

GP outlined the ongoing discussions with certification bodies regarding PAS 100 clauses 4.11.1 (mandating annual QMS audits) and 4.11.2 (prohibiting auditors from auditing their own work). The central query was whether a consultant or internal auditor could independently audit a QMS that they had previously written or updated.

Initial discussions with certification bodies concluded that if a QMS was authored by an individual, subsequent updates do not restore impartiality. Certification bodies aligned with the TAC to audit against this strict interpretation. However, substantial feedback from producers indicated that the rule was unworkable, particularly for smaller operational sites lacking independent, competent staff. In response, the CCS reopened discussions to draft a more proportionate position.

JF sought clarification regarding sites utilising standard CCS-issued templates, noting that these templates were originally authored by Emily and Ciara, and asked whether operators could continue to perform self-audits. GP clarified that the position is directed specifically at commercial consultants, and template users fall outside its scope.

AC queried whether the restriction prevents a different partner from the same consultancy firm from conducting the audit. GP replied that the latest draft states the restriction does not cover different individuals within the same organisation, though this remains subject to change.

GK argued that a blanket restriction would be an overly harsh interpretation, noting that a QMS frequently undergoes substantial historical modifications, making it unreasonable to bar an author from auditing a heavily modified system. GK emphasised that operators rely heavily on consultants for scheme compliance and that consultants have no desire to execute poor quality audits.

AC noted that certification bodies should focus on evaluating the objective quality and scrutiny of an internal audit rather than treating it as a superficial tick-box exercise. JH observed that within environmental consultancy work, professionals routinely audit their own Environmental Management Systems and are frequently the most competent persons to do so.

GK added that a distinction should be made between auditing the structural quality of the written QMS versus auditing whether operational staff are following its procedures correctly. GK enquired when a revised draft position would be available. GP indicated that the target is prior to the late-June TAC meeting.

JH suggested that an interim FAQ document should be published to clarify the underlying intent and manage areas of ambiguity. AC shared that practices currently diverge between certification bodies, with some recording consultant authorship as an observation while others issue a formal non-compliance. GK supported recording instances as an observation in the interim, as it maintains a formal record without penalising operators. GP confirmed that the CCS would discuss this interim approach with certification bodies during the upcoming week.

- Action 14 CCS to discuss with certification bodies the interim measure of recording instances of QMS consultant authorship as an "observation" rather than a formal non-compliance while the formal technical position paper is finalised.

7. An opportunity to discuss other issues raised by producers

JF raised severe ongoing difficulties regarding booking sample collections with Eurofins. Despite direct meetings with laboratory management, operators continue to experience unanswered phone lines and a lack of email response across the three dedicated booking addresses. JF noted that promises made the previous year to introduce an online booking system had failed to materialise.

MS seconded these points, reporting identical communication struggles and noting that operations rely entirely on a single contact named Tyler to secure bookings. Furthermore, MS reported extreme delays in receiving test reports, stating that their facility is currently three months behind on receiving completed data for critical APHA samples.

AC observed that standard turnaround for these results should ideally be within one week. GK asked whether these reporting delays had been flagged to the APHA. MS indicated they were unsure of the correct reporting channel but noted that the APHA appeared satisfied that the operator was actively chasing the missing data.

GK warned that operators should not be left exposed in that position. AC reminded the forum that laboratories maintain a regulatory obligation to report directly to the APHA, raising concerns that if reports are failing to reach customers, they may also be failing to reach the regulator.

- Action 11 - CCS to discuss with the Approved Labs the significance of addressing laboratory performance issues

The forum shifted focus toward a detailed evaluation of PRTs and the production of non-PAS material. AC requested that the forum engage in a broader discussion regarding PRTs and explicitly highlighted the existing challenges regarding the position of REAL concerning the production of non-PAS compost alongside PAS 100 certified material.

AC raised serious concerns regarding the ongoing unpredictability of the PRT, noting instances where batches pass germination criteria but fail completely on top growth with scores as low as 60%, while others score 120% under identical conditions. Because results take six weeks to return, operators routinely process and clear an additional six sequential batches before discovering a failure, rendering retrospective corrective actions ineffective.

AC highlighted that a previous REAL position restricting the production of non-PAS compost alongside a certified PAS process left operators in a difficult position when managing batches that failed solely on tomato top growth. This creates severe space constraints and forces operators to store or re-process material, despite some local authorities preferring to dispatch it immediately as non-PAS waste.

GK stated that running parallel streams is permissible provided materials are strictly segregated, noting that technical rules dictate that the principal grade must reflect the highest tonnage output. AC noted that local authorities frequently assume an entire facility's output is certified, which presents a risk if a portion is downgraded.

GK agreed that facilities require a robust, legitimate output channel for failed material, noting that the core issue is that 9 out of 10 producers have no obvious pointer within their standard parameters to formulate a corrective action for top growth failures, leading to arbitrary retesting.

GK suggested that any procedural changes require an evidence base from the Research Hub and must satisfy wider stakeholders.

GP confirmed that a Research Hub project is actively exploring alternative media options, noting that spring barley offers a faster turnaround. JF asked if operators are retesting failing batches or routing them directly to land deployment. AC re-emphasised that due to the six-week delay and lack of visual abnormalities or photographic evidence from laboratories, tracking failures is exceptionally difficult.

JF shared that during historical top growth failures, consultation with NRM revealed a strong correlation with high chloride levels. JF explained that dry weather conditions had prevented natural rainfall from washing away accumulated salts, suggesting that tracking chloride parameters could assist operators. AC countered that their recent failing batches occurred during the winter months, which had seen heavy rainfall.

To improve clarity, AC requested that laboratory report formats be updated to group weed plants, germination, top growth, and general health criteria clearly on the front summary page as a definitive pass or fail. OD committed to investigate whether failures could be moved to the front page of approved laboratory reports.

- Action 15 - CCS to investigate the possibility of updating the laboratory report format to group weed plants, top growth, germination, and plant health criteria on the front page as a clear pass or fail.
- Action 16 - CCS to feedback issues regarding PRT unpredictability, six-week turnaround delays, high storage costs, and winter seasonal variability to Eurofins.
- Action 17 - OD to look back for scheme comms around non-PAS and PAS production issue, then relay to GP for discussion
- Action 18 - CCS to ask CBs whether non-PAS material is formally recorded during audits and whether issues around large quantities of non-PAS material being produced have been raised.

8. AOBs

OD provided a brief update regarding upcoming consultation timelines for the UK FPR. OD offered to forward relevant materials about the consultation to interested parties and said that the scheme would consider what, if any, response they would provide.

- Action 19 Producers to let OD know if they would like UK Fertiliser Product Regulation Consultation material to be shared with them

JH thanked all participants for their contributions and closed the meeting at 13:30.

Action summary

Action 9 - Producers to continue raising awareness regarding vape contamination in external events and industry stakeholder groups.

Action 11 - CCS to discuss with the Approved Labs the significance of addressing laboratory performance issues

Action 12 - CCS to correct and re-upload the November 2025 forum minutes concerning laboratory applications, ensuring they are recorded as BCS rather than CCS.

Action 13 - Producers to send Jane Hall photos of vapes on-site if interested in contributing or writing a 'Circular' magazine article by end of June

Action 14 - CCS to discuss with certification bodies the interim measure of recording instances of QMS consultant authorship as an "observation" rather than a formal non-compliance while the formal technical position paper is finalised.

Action 15 - CCS to investigate the possibility of updating the laboratory report format to group weed plants, top growth, germination, and plant health criteria on the front page as a clear pass or fail.

Action 16 - CCS to feedback issues regarding PRT unpredictability, six-week turnaround delays, high storage costs, and winter seasonal variability to Eurofins.

Action 17 - OD to look back for scheme comms around non-PAS and PAS production issue, then relay to GP for discussion

Action 18 - CCS to ask CBs whether non-PAS material is formally recorded during audits and whether issues around large quantities of non-PAS material being produced have been raised.

Action 19 - Producers to let OD know if they would like UK Fertiliser Product Regulation Consultation material to be shared with them

Closed Actions

- CCS to reconsider holding an in-person Forum in 2026.
- CCS to raise awareness with the Approved Labs of the significance of reporting within required timescales for pathogen testing for ABP-derived samples
- CCS to clarify the difference between the "6 months reassessment requirement" in PAS 100 versus the "10 months storage limit" in the CRF and whether there is a conflict.
- CCS to discuss with the Certification Bodies (CBs) whether producers need to meet separate End of Waste (EoW) requirements in both Wales (currently QP) and England (CRF) when operating/selling product cross-border. One of the CBs informed a producer that it was not possible to meet both which presents a challenge when dispatching compost to England from a process based in Wales.
- CCS to contact NRW and ask for clarification on the EoW arrangements and cross-border commercial aspects related to their current use of QP and upcoming Regulatory Decision.
- SK to consider emailing NRM to request additional information/evidence regarding the glass/sharps failure, and to provide CCS with an update.

- CCS to discuss with NRM the inconsistency in their position communicated to CCS and producers regarding whether glass is always classed as a 'sharp'
- Producers to listen to the REAL & REA CRF webinar recording if they have questions regarding CRF implications and significance.
- CCS to discuss with the CBs and regulators the expectations for auditing if a regulator raises issues around spreading by third-party contractors.