

# Compost Certification Scheme Producers' Forum

Minutes for the meeting on Monday 3<sup>rd</sup> November 2025

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## Attendees

- Jane Hall (JH) – Chair
- Georgia Phetmanh (GP) – CCS
- Oliver Dunn (OD) – CCS
- Duncan Craig (DC) – CCS
- Grace Egan (GE) – Research hub
- Angela Cronje (AC) – Scott Bros Environmental
- Claire Adamson (CA) – SED Services
- Emma Cheetham (EC) – Elleteq
- Gregor Keenan (GK) – Producers' Representative
- Hope Farm Admin (HF) – Hope Farm
- Phil Gray (PG) – Gray Composting
- Rob Hawkins (RH) – Coastal UK
- Spencer Welchman (SW) – Yorwaste
- Stacey Allen (SA) – Wastewise
- Steve Kay (SK) – FCC Environment

## Summary of acronyms

ABP – Animal by-product

AD – Anaerobic Digestion

APHA – Animal and Plant Health Agency

BCS – Biofertiliser Certification Scheme

CB – Certification Body

CCS – Compost Certification Scheme

CQP – Compost Quality Protocol

Defra – Department for Environment, Food & Rural Affairs

EA – Environment Agency

EC – Electrical Conductivity

EoW – End of Waste

FPR – Fertiliser Product Regulations

LA – Local Authority

NIEA – Northern Ireland Environment Agency

NRW – Natural Resources Wales

ORG – Organics Recycling Group

PAS – Publicly Available Specification

PEPR – Packaging Extended Producer Responsibility

PRT – Plant Response Test

RAM – Risk Assessment Methodology

RBP – Residual biogas potential

RF – Resource Framework

RPS – Regulatory Position Statement

SEPA – Scottish Environment Protection Agency

T&FG – Task & Finish Group

TAC – Technical Advisory Committee

VFA – Volatile Fatty Acids

## 1. Welcome

OD welcomed attendees to the November CCS Producers' Forum and introduced the programme for the afternoon. JH invited producers to highlight any issues they wished to raise later in the meeting. No additional items were raised at this stage.

## 2. Previous Meeting Minutes

JH confirmed that no amendments were proposed to the minutes of the previous meeting, and these were therefore accepted as accurate.

## 3. Updates on the CCS

### Actions from the previous meeting

OD and GP provided updates on actions and developments since the previous forum.

### **CCS to note AC as representing Scott Bros Environmental in the October 2024 minutes and May 2025 minutes**

The CCS confirmed that AC is now recorded as representing Scott Bros Environmental in the October 2024 and May 2025 meeting minutes.

### **CCS to share update with producers on RF revision after the next T&FG meeting**

DC noted that the anticipated Task & Finish Group meeting did not take place. An update will be shared once a further meeting is convened.

### **OD to re-share AC's contract contamination documents with all forum attendees**

OD confirmed that AC's contamination management documents had been shared with previous attendees, specifically the 'Practitioner's Guide to Preventing and Managing Contaminants in Organic Waste Recycling', the 'REA Position Statement on maximum contaminant levels in biowastes specifications for composting', and 'SEPA's Guidance on Food Waste Management in Scotland'.

### **OD to follow up with SA regarding their discussion with APHA regarding surface-only sampling**

OD summarised the latest communication with APHA, stating that officers may continue to sample at their discretion. SA confirmed similar experience, with APHA officers sampling "where and how they see fit". JH noted that the issue appears concluded, albeit unsatisfactorily.

### **AC to send GP the PR number and site name for the site where an internal audit was conducted, meaning that the auditor was auditing their own work**

AC had forgotten to send the details, but GP confirmed it was not needed. The audit issue related to whether it was conducted independently, not a qualification. SA's APHA sample had passed, so no further action was required. The action for AC was closed.

**CCS to further consider introducing Internal QMS auditing training, discussing this topic at the CBs Auditor roundtable, and considering the discrepancies during the PAS review(s)**

GP updated that the CCS has further considered the introduction of internal QMS auditing training and discussed discrepancies during the PAS reviews. Two new draft positions were presented at the recent CB roundtable meeting, relating to who may conduct QMS audits and internal auditor training requirements. No concerns were raised by CBs. These positions will be circulated to stakeholders for comment before publication within the forthcoming revision of the Technical Requirements document.

**CCS to look into whether operators can decide not to test for RBP if VFAs are indicative**

The forum discussed whether operators could decide not to test for RBP if VFA results were indicative of performance. OD asked if VFA results had ever led to RBP tests being cancelled. The representative of both Scheme Approved Labs confirmed they were not aware of such cases, noting that RBP failures were usually due to inhibition rather than exceeding limits. They both confirmed there were no procedural issues if customers wished to cancel the tests, though it was considered unlikely.

**CCS to share producer feedback with Eurofins about courier issues and ensure labs understand sample timing requirements.**

CCS reaffirmed courier timing requirements during the last lab quarterly. JH considered this action complete.

**CCS to feedback 'EoW at point of dispatch' concerns to EA.**

The issue was strongly highlighted to EA and may have delayed publication.

**OD to fix and resend in-person forum survey.**

The surveys and forum were postponed due to Resource Framework priorities. The in-person forum is expected to be revisited next year.

## **E. coli safeguards**

GP reminded producers of the additional safeguards implemented following the 2024 laboratory incident where a procedural error at one of the Approved Labs led to invalid E. coli results for solid compost and digestate samples tested between the 19th of March and the 4th of May. The error caused under-reporting, affecting 11 BCS and 31 CCS processes; all affected results were treated as invalid. A risk assessment and regulatory engagement are under way, with concern noted about scheme robustness and reputational risk, though no commercial impacts have been identified to date.

The Safeguarding changes included updated laboratory terms and conditions, enhanced staff training, requirements for subcontractor auditing, and the introduction of data provision clauses within the next version of the Scheme Rules to expedite issue resolution.

AC highlighted ongoing challenges with ABP pathogen testing turnaround times and reinforced the importance of laboratories understanding their regulatory responsibilities.

Action 2: CCS to raise awareness with the Approved Labs of the significance of reporting within required timescales for pathogen testing for ABP-derived samples.

JH invited comments on the summary paper circulated to attendees. AC noted that he had not received the document; OD agreed to resend it.

Any questions on the summary paper?

No questions were raised.

#### 4. Update on the Resource Framework revision

DC provided an overview on the publication of the interim Compost Resource Framework (CRF) and the full CRF revision due in 2026. He outlined the regulatory context following publication of the CRF, RPS 317 and RPS 358, noting that these now apply in England and replace the CQP. DC highlighted the shift to achieving End of Waste (EoW) at the point of dispatch, with storage of non-waste material permitted only where supply records or contracts are in place.

DC summarised the clarifications to RPS 317 and RPS 358, emphasising operators' responsibilities when notifying the EA, the timelines for registration, and the evidence required for upgrading processes to meet new plastic limits. He also noted the implications for test reports, explaining that although the reduced plastic limit is now shown on laboratory reporting templates, results in excess of this reported limit will not automatically constitute a non-compliance where operators are correctly using RPS 317 during the exemption period.

DC provided an overview of the waste code changes introduced by the CRF, including the removal of all "99" codes and the need for operators to review their accepted wastes carefully. He explained that the removal of household wood waste relates to EA concerns about treated timber entering the biowaste stream, and that operators should contact their local EA officer with any queries regarding their waste inputs.

DC also noted the work underway to help the industry understand updates to the criteria for achieving EoW, including allowances for temporary non-waste storage under RPS 358. He confirmed that BCS will continue publishing guidance to support operators during this transition.

Finally, DC highlighted the growing regulatory focus on Nutrient Management Plans, stressing that these will become increasingly relevant to demonstrating landbank suitability and ensuring appropriate deployment of compost. DC reiterated that producers are permitted to store any one batch of compost for up to ten months, provided there is a sales history or contract of supply supporting that quantity. This requirement is detailed in Section 3.1 of the RF.

SW queried the apparent conflict between the RF's ten-month limit and the six-month limit set out in PAS100. DC agreed that the discrepancy should be clarified.

*Action 3: CCS to clarify the difference between the "6 months storage limit" in PAS100 versus the "10 months storage limit" in the RF and whether there is a conflict.*

Discussion then focused on the differing positions across UK regulators. SW and SK, both operating in Wales, raised concerns that NRW appears to be certifying only to the previous Quality Protocol (QP), which prevents producers based in Wales from supplying compost into England under the RF. GP noted that similar cases have been observed and agreed this presents a cross-border compliance issue.

*Action 4: CCS to discuss with the Certification Bodies (CBs) whether producers need to meet separate EoW requirements in both Wales (currently QP) and England (new RF) when operating or selling product cross-border.*

Following further discussion, JH proposed that there was insufficient information to decide now, and suggested clarification be sought directly from NRW.

*Action 5: CCS to contact NRW and ask for clarification on the EoW arrangements and cross-border commercial aspects related to their current use of the QP and upcoming Regulatory Decision.*

## **5. Feedback from the last Technical Advisory Committee**

GK summarised items discussed at the most recent TAC meeting. Topics included internal auditing practices, early indicators for PRT, and laboratory performance. Late sample reporting and pathogen subcontracting remain ongoing concerns. GP confirmed that two laboratory applications have been received for BCS approval, with one additional expression of interest under CCS. If approved, the BCS applications may expand to PAS100 testing.

## **6. Policy Updates**

DC outlined ongoing policy work, noting that most activity since July has focused on the RF implementation.

He highlighted the government's *Simpler Recycling* reforms and the need to assess potential impacts on composting feedstock. The CCS intends to complete analysis by year end to ensure preparedness for the 31 March implementation deadline.

DC also discussed upcoming developments regarding compostable packaging. A forthcoming white paper on compostables is expected to classify compostable materials as "red" due to their limited recyclability and concerns about contamination. This could negatively affect the compostables sector.

JH, AC, and GK shared views on compostable packaging performance, with several producers noting differing decomposition results between in-vessel and open-air composting systems. SA commented that compostable materials had shown no degradation in her site trials.

JH reported that the mixed results concerning degradability reflects a policy trend prioritising reduction and reuse over compostable alternatives, as reinforced in the PEPR Risk Assessment Methodology (RAM).

## **7. Research Hub Updates**

GE provided updates on ongoing and new Research Hub projects.

### **Project 4 - PRT Tomato / Spring Barley Comparison**

GE reported that the project aimed to compare the response of spring barley plants grown in CCS-certified compost with results from the standard tomato Plant Response Test. The contract had been awarded to Biomathematics and Statistics Scotland (BioSS). Phase 3, focused on data analysis, was scheduled to begin in December 2025, and the project was due for completion in summer 2026.

### **Project 7 - Risk Assessments to Inform CRF and ADRF Revision**

GE reiterated that this project aimed to support the development of evidence-based EoW positions for compost and digestate. The project was one of the 2025 selections. Exposure scenarios were being developed for each hazard group identified through the gap analysis, examining realistic, potentially high-risk pathways for human, animal, and environmental contamination. The work remained on track for completion in January 2026, with the final report expected to inform the Environment Agency's RF revisions later in 2026.

### **Project 10 - PRT Peat Alternatives for Control Growing Media**

GE confirmed that the project team and Steering Group were shortlisting peat alternatives for subsequent physical property testing under the PRT methodology. Key considerations for the shortlist included similarity of physical properties to peat, cost-effectiveness, and ready availability from more than one supplier. Experimental work was scheduled to begin in winter 2025.

### **Project 2502 - Evaluating Physical Contaminants in Delivered and Pre-Treated Biowastes**

GE noted that this 2025 project would examine both composting and AD processes. In the context of local authority kerbside food waste collections, the project aimed to quantify contaminant levels in delivered biowastes and after pre-treatment and assess how these levels affected Scheme participants.

GE reminded attendees that the annual Research Hub survey had been distributed and encouraged participation.

## **8. Further issues raised with CCS Producers' Representative**

GK raised the ongoing debate regarding the suitability of the current PRT for compost destined for agricultural use. He explained that while the tomato seed test is highly sensitive and appropriate for high-value horticultural applications, its relevance for bulk soil improvers remains disputed.

Producers discussed potential alternatives, such as adjusting dilution ratios or introducing agricultural soil comparators. PG noted that excessive testing requirements could discourage certification, while GK stressed the importance of maintaining credibility through evidence-based revision. The forum agreed that future changes must be supported by robust research through the Hub.

## **9. An opportunity to discuss other issues raised by producers**

### **Laboratory classification of sharps**

KS reported that NRM had classified glass fragments as sharps under PAS100 definitions. SK and AC expressed concern that this conflicted with standard interpretation. GP advised requesting photographic evidence for review.

*Action 6: SK to consider emailing NRM to request additional information or evidence regarding the glass/sharps failure, and to provide CCS with an update.*

*Action 7: CCS to discuss with NRM the inconsistency in their position communicated to CCS and producers regarding whether glass is always classed as a "sharp".*

### **PRT interim and proxy testing**

OD reminded producers that interim reports, including EC and pH data, may be requested from laboratories. While no direct proxy test is currently available, outcomes from the ongoing PRT research project may provide future options.

## Depot drop-off arrangements

OD reported that uptake of courier depot drop-off options has increased and is proving effective according to feedback from the Approved Labs.

## SEPA position

DC informed that there is some uncertainty around the official publication of SEPA's new EoW position, as the current EoW positions remain available online. However, no major changes are expected.

NOTE: SEPA confirmed during a meeting after the forum that the EoW position was officially published and in force from 1st November 2025 when the former EoW position was removed.

## 10.AOBs

### Forum planning

OD advised that due to the ongoing RF work, plans for an in-person forum have been postponed.  
*Action 1: CCS to reconsider holding an in-person Forum in 2026.*

### Plastic limits in local authority contracts

JH raised concerns that some local authority contracts still permit higher plastic limits than those introduced under the RF. This creates a competitive disadvantage for PAS-compliant producers, as those with less stringent permits (e.g. older permits that haven't been updated) and higher plastic limits are winning contracts over those sites which are more tightly regulated. The EA's new standard rules permits, and the RF are much stricter, but LA contracts often fail to reflect this unless they specifically require waste to be treated to meet PAS100.

### CRF webinar

DC reminded attendees that the recording of the joint REAL and REA CRF webinar remains available.  
*Action 8: Producers to listen to the REAL & REA CRF webinar recording if they have questions regarding CRF implications and significance.*

### Vapes and fire risk

JH reiterated that the presence of discarded vapes continues to present a fire hazard at composting sites. Producers were encouraged to raise the issue within other industry and regulatory settings.  
*Action 9: Producers to continue raising the issue around vapes in other events or stakeholder groups they participate in.*

### Auditing and regulatory notifications

AC described a recent case in which the EA raised concerns about spreading activities conducted by a third-party contractor, which were then passed to the Certification Body without the producer's knowledge.  
*Action 10: CCS to discuss with the CBs and regulators the expectations for auditing if a regulator raises issues around spreading by third-party contractors.*

## Actions

1. CCS to reconsider holding an in-person Forum in 2026.
2. CCS to raise awareness with the Approved Labs of the significance of reporting within required timescales for pathogen testing for ABP-derived samples.

3. CCS to clarify the difference between the "6 months storage limit" in PAS100 versus the "10 months storage limit" in the CRF and whether there is a conflict.
4. CCS to discuss with the Certification Bodies (CBs) whether producers need to meet separate End of Waste (EoW) requirements in both Wales (currently previous QP) and England (new RF) 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 selling compost produced in Wales in England.
5. 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.
6. SK to consider emailing NRM to request additional information/evidence regarding the glass/sharps failure, and to provide CCS with an update.
7. CCS to discuss with NRM the inconsistency in their position communicated to CCS and producers regarding whether glass is always classed as a "sharp".
8. Producers to listen to the REAL & REA CRF webinar recording if they have questions regarding CRF implications and significance.
9. Producers to continue raising the issue around vapes in other events or stakeholder groups they participate in.
10. CCS to discuss with the CBs and regulators the expectations for auditing if a regulator raises issues around spreading by third-party contractors.