



Compost  
Certification Scheme



Biofertiliser  
certification scheme

# Compost Certification Scheme Producers' Forum

Thursday 15th May 2024

## Attendees:

Jane Hall (JH) - Chair  
Georgia Phetmanh (GP) - CCS  
Oliver Dunn (OD) - CCS  
Grace Egan (GE) - Research Hub  
Duncan Andrew Craig (DC) - CCS  
Gregor Keenan (GK) - Keenan Recycling (CCS Representative)  
Stephen Kay (SK) - FCC Environment

Georgina Smith (GS) - Hope Farm  
Giles Johnston (GJ) - Smartspeed  
Donnelle Fitzpatrick (DF) - Material Change  
Jo Fitzpatrick (JF) - Material Change  
Martyn Richards (MR) - Agriton  
Angela Cronje (AC) - Scott Bros Environmental  
Katrina Waters (KW) - Envar

## Acronyms

CCS – Compost Certification Scheme  
BCS – Biofertiliser Certification Scheme  
EA – Environment Agency  
CQP – Compost Quality Protocol  
T&FG – Task & Finish Group  
EWC – End of Waste Code  
CRF – Compost Resource Framework  
CB – Certification Body  
QMS – Quality Management System  
PAS – Publicly Available Specification (PAS 100 and PAS 110)

PRT – Plant Response Test  
VFA – Volatile Fatty Acids  
RPS – Regulatory Position Statement  
EoW – End of Waste  
REA – Renewable Energy Association  
LA – Local Authority  
CIWM – Chartered Institute of Wastes Management  
HSE – Health and Safety Executive  
APHA – Animal and Plant Health Agency

## 1. Welcome

OD welcomed new CCS forum attendee Martyn Richards from Agriton and the new Research Hub Manager, Grace Egan. Attendees were directed to contact Grace at [grace@realschemes.org.uk](mailto:grace@realschemes.org.uk) for any Research Hub queries.

## 2. Previous Meeting Minutes

The minutes from the previous forum were accepted.

AC clarified that she represented Scott Bros Environmental (or SBE).

JF raised a clarification issue regarding E. coli failures, questioning whether this should be corrected to compost rather than digestate. AC clarified that it pertained to both CCS and BCS.

## 3. Previous Meeting Actions

DC reported on the action to provide producers with an update on the Compost Quality Protocol (CQP) revision following the 23rd of October T&FG meeting. He noted that the EA meeting expected beforehand had not yet taken place, but the intended update would still cover End of Waste Code (EWC) changes, the potential adoption of the Compost Resource Framework (CRF) in Northern Ireland and/or Wales, and changes to plastic limits.

OD gave the update on the action to inform producers when scheme documents were aligned with CRF implementation. He confirmed that CCS had held regular discussions with the EA on the CRF and prepared a full set of supporting materials, including Scheme Rules, Guidance Documents, CCS/BCS Position Documents, Request Forms, updated Websites, Checklists, Database changes (covering limits and certification status by country), producer communications, fact sheets for producers, Certification Bodies (CBs) and customers, contract variation letters for CBs, and new reporting templates.

On the action to continue investigating courier collection failures for sample submissions, OD confirmed he had discussed the issue with approved laboratories and explored ways to improve reliability. He noted that new guidance on depot drop-offs had been written and would be published shortly, and any questions should be directed to the relevant approved laboratory.

Updating on the action for producers to consider contacting Local Authorities regarding the upcoming tightening of plastic limits, GK stressed the importance of doing so and shared that he had already spoken to Scottish (Local Authorities) LAs about ongoing contamination issues in feedstock. He highlighted that this regulatory change was an opportunity to negotiate on contaminated load assessment and fine levels.

GJ queried whether GK's recommendation assumed feedstock was from kerbside collections and explained that his organisation had ceased working with LAs due to contamination, which had reduced turnover by two-thirds. GK acknowledged the challenges, especially in England, where the EA's relationships with LAs were less productive than SEPA's in Scotland, and warned that smaller screening sizes would lead to higher volumes of unusable oversize material. GK reiterated that many organisations had no option but to deal with LAs. He noted that reduction in allowable levels of plastic would be difficult for producers in England as SEPA had a better relationship with Scottish LAs than EA did with English LAs. Introducing smaller screens would mean higher volume of oversize material that wasn't usable.

Regarding discussions between scheme participants and local authorities about contamination levels in waste management contracts, OD mentioned he had previously shared AC's documents with attendees at the last forum and offered to redistribute them to new participants, the documents were shared with attendees after the meeting.

The action for producers to contact GE at [grace@realschemes.org.uk](mailto:grace@realschemes.org.uk) to raise queries or express interest in presenting to university students through REAL Research Hub-led webinars was to be brought forward to the next meeting.

The action for Stacey Allen [not present] to consider contacting The Animal and Plant Health Agency (APHA) area officer to clarify sampling procedures and challenge their approach regarding surface-only compost sampling was to be brought forward to the next meeting.

OD reported that the aim of the new format for forum minutes had been to reduce word count and focus on key points rather than providing a transcript. He had received positive feedback from one scheme representative and no complaints otherwise. The forum would therefore continue with summary-style minutes going forward. This item was completed.

On the action for AC to arrange an internal (Quality Management System) QMS audit for a CCS site in the North-East that she had written the QMS for, she reported that she had completed the internal audit herself at the site with no feedback received from the CB auditor, closing this site-specific action. However, the broader question of auditing one's own work would be rolled forward, with GP asking AC to share the site details with REAL.

Following on from the topic of Internal Auditing, OD provided background on the issue of QMS auditor training, which had arisen from concerns that CB auditors were inconsistently requesting proof of training aligned with internal audit duties, and questions about whether PAS 100 and PAS 110 were aligned. JF asked if REAL could support operators with training on auditing.

OD shared that REAL had discussed the matter with the CBs, and all parties agreed that there was no formal requirement for a specific qualification or training course. This topic would be addressed at the next auditor roundtable, which has been delayed due to the CRF publication timeline. REAL is also considering whether developing an internal audit training course would be appropriate and had recorded this section of PAS 100 and PAS 110 for possible review. GS shared that their auditors wanted the person doing the internal audit to be PAS100 trained.

Finally, DC provided the update on REAL's role in the Circular Economy Task Force (CETF). Given CCS' interest, DC indicated to Task Force members the intention to contribute. This communication has been forwarded to the Agri-Food section of the CETF.

#### 4. Updates on the CCS

No questions were asked about the Scheme Development Summary Paper.

#### 5. Feedback from the Last Technical Advisory Committee (TAC)

GK provided feedback on the TAC, reporting that the following items had been discussed:

Issues around courier collection has been identified, particularly connected to isolated sites that resorted to using their own couriers. GK urged participants to provide feedback to the lab if there were issues with couriers.

The Plant Response Test (PRT) research project was underway. GK explained that the test took too long to provide a result and did not point towards corrective action in the event of failure. The current project might improve this situation, with the eventual possibility of making a distinction between horticultural PRT and agricultural PRT.

AC proposed a pre-screening test prior to the PRT test, in light of top growth failures and pH being too low in failed compost samples. This would mirror similar procedures in BCS and would give producers additional options in cases of pre-screening/interim test failure.

GK suggested that AC speak to REAL about proposing a research project along these lines. GP agreed and asked about the usual procedure in BCS when samples failed Volatile Fatty Acids (VFA) screening.

#### 6. Policy Updates

DC updated the meeting on policy developments:

Speaking on the timeline for Release of Resource Framework DC reminded attendees that he had sent out an email the previous month to register interest in a webinar on the changes to the compost resource framework and invited attendees to contact him. DC said that at least one more T&FG was expected to review the framework one last time, with a couple of minor changes expected from the last draft but hopefully not too many more.

DC forecasts a six-week delay between the T&FG final meeting and release of CRF, to allow CCS to prepare scheme participants for the CRF. DC was confident that CRFs and Regulatory Position Statement (RPS) and be shared after the final T&FG meeting.

DC attributed some delay in publication to GOV.uk formatting requirements. He had The REA's Organics Conference, where an EA representative had given a June/July timeline for publication. OD and GP were working with EA on implementation of CRF and scheme readiness.

DC reported that after a High Court Ruling on Poultry Manure in River Wye Catchment, poultry manure was now classified as waste rather than by-product. The EA was reviewing the CRF considering this ruling, which might be another cause of delayed publication of Compost Resource Framework and Anaerobic Digestate Resource Framework. AC asked if this would apply to all manure. DC said this might potentially be the entry point to wider discussion about animal waste. REAL was aware of this discussion and sought urgent clarification on the reasoning behind the ruling, as well as whether it would ultimately apply to non-poultry manure. REAL will follow up on this matter at the forthcoming Technical Advisory Committee meeting.

DC outlined several significant changes likely to be incorporated in the CRF. He said that if material complied with PAS 100 and the CRF, it would not be restricted in terms of where material could be applied. DC explained that compost reaching End of Waste (EoW) status was likely to be when material 'had been dispatched', and there was 'certainty of use'.

JF noted this would cause issues for producers who didn't store product on concrete, representing a lot of capital expenditure that sites wouldn't have budgeted for. DC confirmed that this issue had been raised with the EA and explained that any material stored in an intermediate process without end user identified would be treated as waste. DC said he was seeking clarity on this point. JF pointed out that getting compost off-site could only take place if land was not rain saturated.

AC said that currently after six months' storage, compost reverted to waste and agreed with JF that clarity was needed from the EA. GK asked about the purpose of the change, and DC speculated that this was to create clarity that compost was compliant at point of dispatch. GK raised the prospect of unintended consequences, asking what would happen in cases of topsoil and PAS100 compost mixing on site. JF suggested inserting 'and/or material has certainty of use'. DC said that the CCS-appointed CB would be arbiter of compliance with PAS and that plastic contaminant limit would be brought into alignment with Scotland. He explained that CCS producers would need to ensure that end-users had nutrient management plans in place, and that the EA would provide further clarity.

JH asked DC how CCS participants should feedback unintended consequences to the EA. DC asked participants to email him so he could bring their concerns to the T&FG meetings, as there was no official consultation process prior to CRF publication. JH encouraged attendees to feed back to DC so the EA could be made aware of real-world factors they might not have considered.

JH raised that 'point of dispatch' being the compliance point was out of line with other Quality Protocols (QP) being revised, such as plastic pellet production. She advised challenging this. AC pointed out this was also out of line with BCS QPs.

AC asked if dispatch point was a 'notional dispatch', when there was an order number, or only when material physically left site. DC agreed this was a key question.

GK pointed out that CRF revision didn't account for 'last minute' ordering behaviour of the agricultural market.

## 7. Research Hub Updates

GE updated attendees on the progress of the Research Hub's processes and ongoing projects:

The project selected from the 2024 proposal intake was "Alternative control growing media for REAL CCS plant response tests."

Regarding Project 7 (Risk Assessments to inform CRF), AC asked about the timing of CRF publication and the completion of Project 7.

## 8. Issues Raised with CCS Producers' Representative

GK updated attendees on CCS Producers queries since the last TAC meeting:

JF raised an issue regarding quality of service from Eurofins. JF had a meeting scheduled with the lab director that month. There were ongoing issues with courier delay, leading to samples being 'invalid'. Peat control results were also an issue. Other attendees corroborated JF's experience.

GP expressed disappointment that service hadn't improved. Regarding sampling guidance and transit time, OD had sent across a clarification note that had been circulated approximately three years ago, in relation to courier requirements.

GS mentioned having no interim reports for any samples that year, with varying timeframes for results to be provided.

GK reported that NRM hadn't had delayed results, though couriating still posed an issue.

AC added that they had contrasting experiences between NRM and Eurofins regarding confirming that samples had been received, noting that Eurofins didn't acknowledge receipt.

GP clarified that it was a requirement of the lab T&Cs to acknowledge receipt and said she would raise this with Eurofins as an area of non-compliance. She noted that while it was not a requirement in the T&Cs to provide interim reports, she suggested producers request interim reports.

GP committed to consider next steps regarding labs and couriers and suggested GK raise this at TAC. GP also committed to share positive feedback with labs.

GP concluded the discussion saying that outreach was being conducted to increase lab numbers for both schemes.

## 9. Other Issues Raised by Producers

On the topic of disposable vapes, AC mentioned finding lots of vapes coming in with green waste, presenting a potential fire hazard. She suggested that LAs could consider lockable green waste bins for households, which would stop ad hoc addition of non-green waste items.

JH expressed hope that 'Simpler Recycling' would be the opportunity to improve issues like these, noting there was demand for better communications. JH committed to raise an action with the Chartered Institute of Wastes Management (CIWM) and asked attendees to continue raising the issue of vapes in whichever forums they participated in. She also committed to get in touch with EA's LA unit and suggested involving HSE and Fire Authority.

AC asked if the REA via Jenny Grant could do something on this as a trade body group. DC confirmed this could be raised.

## 10. Any Other Business

OD asked whether attendees had completed the forum survey and whether they would be interested in an in-person winter meeting. He explained that they had sent out a two-question survey regarding an in-person forum. While the link had a high click-through rate, completion was low. He wanted to check whether this was due to a technical issue or general disinterest.

JF confirmed she had completed the survey, suggesting this was likely a technical issue. OD committed to send out the survey again.

The meeting ended at 13:40.