

CCS Producers' Forum - Resource Framework

Tuesday 22nd July 2025

Attendees

Oliver Dunn (OD) - REAL CCS
Duncan Craig (DC) - REAL CCS
Georgia Phetmanh (GP) - REAL CCS
Grace Egan (GE) - REAL CCS
Andrew Groenhof (AG)
Morgan Davies (MD)
Appleyard, Gary (GA)
Peter Upham (PU)
Francine Powner (FP)
Samuel Ziki (SZ)
Donelle Fitzpatrick (DF)
Katrina Waters (KW)
Rob Hawkins (RH)
Michael Smyth (MS)
Chris Eels (CE)
Wallace, Melanie (MW)
Lynda Mackintosh (LM)

Kay, Stephen (KS)
Scott, David (SD)
Georgina Smith (GS)
Jo Fitzpatrick (JF)
Angela Cronje (AC)
James Cooper (JC)
Stacey Allen (SA)
Lynas, Richard (RL)
Phil Gray (PG)
Sarah Kilkelly (SK)
Titley, Christopher (TC)
Tim Stainer (TS)
Ben Dyson (BD)
Dan Long (DL)
Sue Grundon (SG)
Karl Pascoe (KP)
George Harvey (GH)

Welcome

DC welcomed attendees to the ad-hoc July CCS Producers' Forum, focused on the Compost Resource Framework. The forum began with introductions and a brief update on the upcoming REA-REAL joint webinar with the Environment Agency (EA), to be held in early August.

Background to the Revision of the Compost Resource Framework (CRF)

DC explained that revision work on the CRF began in late 2022, with CCS contributing extensively to the EA-led Task & Finish Group. The revision aims to align the resource framework with current best practice and emerging evidence, most notably by proposing a tighter plastic contamination threshold. DC noted the revision is also driven by the delay in updating the CQP, and the role of the Research Hub's risk assessment project.

DC stated the interim CRF is scheduled for publication on 4th August 2025, with compliance required immediately upon publication. It will be published alongside a Regulatory Position Statement (RPS) to enable producers to continue using the current PAS 100 plastic limits (permitted by the CQP) for up to two years while demonstrating a transition to the new CRF limit.

NOTE: The publication date for the CDRF was pushed back and CCS is currently awaiting further information from the Environment Agency on the updated timelines.

GP advised the group not to send RPS notification emails before the publication date.

The Role of the Ongoing Risk Assessment Project

GE provided an update on the Research Hub's ongoing Risk Assessment Project, which will feed into a second RF revision in 2026. The project's initial rapid evidence review, and gap analysis have concluded. The current phase involves developing exposure scenarios and a risk matrix for each identified hazard group. Final outputs are expected by late 2025, and will be made available to the EA.

JC asked whether the risk assessment would include a benefits analysis, noting the EA's traditional focus on risk. GE explained that the project was scoped narrowly to avoid "scope creep," but acknowledged the value in a more balanced impact assessment.

Summary of Key Changes in the CRF

Input Materials and Waste Codes

DC outlined key updates to the allowable EWC codes, now found in Section 2 of the CRF rather than Appendix B of the CQP. He emphasised these changes apply to England only, though conversations with SEPA are ongoing. DC showed all waste code changes on his screen during the meeting but summarised that most of the changes were reflective of a reorganising of waste recategorisation rather than a consequence of significant wastes being added or removed from the framework. AC noted that Scotland may also remove fleshings from its list; DC confirmed that this remains under discussion.

Removal of Market Sectors and Visual Aids

DC informed that figures 1 and 2 have been removed due to formatting restrictions on GOV.UK. Additionally, references to market sectors have been removed; producers can now supply to any market provided the material meets the CRF criteria.

Plastic Limits Reduction

Moving to the more significant changes, DC explained that clause 3.3 introduces a reduced plastic limit of 0.06% (compared to the CQP limit of 0.12%), aligning with SEPA's limit and representing half the current CQP threshold.

UKAS Accreditation

DC added that clause 4.1 requires Certification Bodies (CBs) to be CCS-appointed and UKAS-accredited or "working toward accreditation".

Nutrient Management Plans (NMPs)

DC clarified that producers now need to confirm that the end-user has an NMP in place (i.e., a tick-box declaration from the recipient).

JF asked whether model contract templates would be updated to reflect this change. GP confirmed there were no plans to provide updated templates as the practice of providing template contracts has been phased out of the scheme for some years now.

End-of-Waste (EoW) and Storage

DC stressed the significance of changes regarding EoW status. Material is now considered waste until the point of dispatch, unless certainty of use can be demonstrated. This marks a departure from the CQP. Storing product on off-permitted land before dispatch is no longer permitted. AC raised concerns over vagueness in the "indefinite storage" condition for losing EoW status. DC pointed to the latest PAS guidance, which states 6 months is the maximum storage time without reclassification as waste.

Several attendees expressed concern and frustration at this change, saying that not only would this change be very disruptive to processes but that due to the EA's very slow rate at granting permits for

waste storage, the EA had created a system that give producers no choice but to store material as waste on unpermitted land despite their best efforts to gain the newly required permits.

MD also raised concerns over conformity labelling, especially given large stocks of bags printed with "Conforms to PAS 100 and the CQP." GP responded that discussions are underway with the EA and the TAC regarding potential new conformity marks, and a transition period is likely to give producers time to clear their existing surplus stock.

Regarding the plastic limit reduction exemption via the RPS, RL asked what format of evidence would be needed for the RPS. DC confirmed it would be similar to previous email-based notifications. OD added that while the first email to notify for RPS exemption had no requirements, the second email to be sent within 6 months has strict requirements for evidence; purchase orders, process upgrade plans, work orders, or other explicit evidence of process improvement is required and the EA will be individually investigating all RPS evidence emails to assess the validity of the evidence.

AC expressed frustration with the EA's interpretation of EoW, noting that off-site storage without permitting is unworkable for high-volume sites. DC encouraged producers to voice these concerns directly to local EA officers.

Scheme integration and implementation of the CRF

OD talked attendees through the scheme documentation and systems currently being updated to align with the new Resource Framework. He explained that Version 9.1 of the CCS Scheme Rules, incorporating only the minimum necessary changes to ensure alignment with the RF, would be published on 4th August. At that point, Version 9 would be formally withdrawn. The audit checklists are undergoing review by all Certification Bodies, with the intention that revised versions will be integrated into their procedures ahead of the 4th August deadline.

OD noted that the Analysis Request Form is also being simplified, and the Schemes are in active discussion with the laboratories to finalise a new version. The new PAS 100 Lab Reporting Template has already been trialled and proven successful; however, integration into formal lab operating procedures is expected to take longer than the Environment Agency's four-week notice period, meaning full implementation will follow at a later stage. This applies to the new request form too.

Guidance documents are receiving only minor updates, mainly replacing references to the CQP with the CRF. Similarly, the CCS position on technical requirements document has been reviewed and amended where necessary.

The Schemes' database is also being updated to include a new RPS tracking system and to enable migration of certified processes over to CRF certification as audits occur.

Finally, OD confirmed that the CCS website would be fully updated on 4th August, in order to prevent confusion during the transition.

OD confirmed that no general transition period for CRF compliance is planned, but concessions may be made on a case-by-case basis (e.g., conformity marks).

Webinar and engagement plans

DC confirmed that a joint webinar will be held with the REA in early August. This will include an EA representative who contributed to the CRF revision, offering producers a chance to engage directly.

DC also noted that NRW may confirm CRF adoption or adaptation shortly, while NIEA has yet to respond. SEPA will not adopt the CRF.

AOBs

PU queried whether copies of the CRF and RPS could be accessed ahead of time. DC confirmed that they would be published on 4th August.

An attendee asked if RPS usage is permitted for applicants – OD confirmed that RPS usage was permissible for all scheme participants, applicants, and even those who apply after the 4th of August.