

Compost Certification Scheme Producers' Forum

Minutes for the meeting on Wednesday 16th October 2024

Attendees

Jane Hall (JH)	Chair
Georgia Phetmanh (GP)	CCS
Oliver Dunn (OD)	CCS
Megan Muller-Girard (MMG)	Research Hub
Duncan Andrew Craig (DAC)	CCS
Gregor Keenan (GK)	CCS Producers' Representative
Stacey Allen (SA)	Wastewise
Richard Lynas (RL)	Suez Environment
Angela Conje (AC)	Roots Organic (CCS Sites?)
Spem Welchman (SW)	Yorwaste
Howard Everson (HE)	TMA Bark
Georgina Smith (GS)	Hope Farm
Martin Jeffers (MJ)	Dundee City Council (Environment Department)
Andrew Groenhof (AG)	Biffa
James Cooper (James C)	Envar
Jackie Cooper (Jackie C)	JCR Recycling

Summary of acronyms

CCS - Compost Certification Scheme	SEPA - Scottish Environment Protection Agency
CQP - Compost Quality Protocol	RPS - Regulatory Position Statement
T&FG - Task & Finish Group	PAS - Publicly Available Specification
TAC - Technical Advisory Committee	ORG - Organics Recycling Group
LA - Local Authority	APHA - Animal and Plant Health Agency
EA - Environment Agency	BCS - Biofertiliser Certification Scheme
RF - Resource Framework	CB - Certification Body
AD - Anaerobic Digestion	Defra - Department for Environment, Food & Rural Affairs
NRW - Natural Resources Wales	FPR - Fertiliser Product Regulations
NIEA - Northern Ireland Environment Agency	

Housekeeping

REAL was pleased to welcome three new CCS forum attendees James Cooper (JC), Spen Welchman (SW), and Andrew Groenhof (AG).

The minutes from the previous forum were accepted without objection.

Updates on the CCS

Actions from the previous meeting

- REAL to share an update with producers on the Compost Quality Protocol (CQP) revision after the next Task and Finish Group (T&FG) meeting

DC presented updates on CQP/RF at a later point in the meeting (see below)

- GK to raise issues around contamination allowances in Local Authority (LA) tender requirements/contracts again during the upcoming Technical Advisory Committee (TAC) meeting
- GK to raise issues around lab courier collections during the upcoming TAC meeting

GK presented updates from the TAC at a later point in the meeting (see below)

- Producers to consider approaching LAs to share that the plastic limits are expected to be tightened in the near future, making it more difficult to achieve compliance if the quality of wastes received is poor

GK raised this at a later point in the meeting (see below)

- HE to consider contacting local EA officer about waste-derived compost sold by local council – HE to share if at the forum but OD or GK to comment if not

No update, Discussion ongoing

- Producers to consider contacting LAs about collection vehicles being improperly cleaned between different types of collections (e.g., glass then green waste) if this is a regular issue for them – OD/GK
- No update

- Producers to contact Megan (megan@realschemes.org.uk) to raise any queries or express interest in presenting to university students through REAL Research Hub-led webinars

MMG touched on this during the Research Hub (RH) section of the meeting.

Any questions on the summary paper?

No questions were raised.

E.coli investigation conclusion

In May, an approved lab notified that a number of passing E. Coli results were now invalid due to results being potentially underreported. 32 composting processes were impacted by these invalid E. coli tests. The schemes carried out an investigation and conducted a risk assessment. This risk assessment found that the likelihood of digestate containing E. coli above the PAS limits is very low. The schemes are not concerned by the outcome of this assessment and have shared the outcomes with the regulators and will share them with the TAC next month.

This experience has served to strengthen the robustness of the schemes with the development of further safeguards and processes to avoid similar issues in future. The schemes are updating Lab Terms and Conditions (T&Cs) and scheme rules to prevent this from recurring and if so, to respond in a more streamlined way.

AC asked whether GP could share what further safeguards would be implemented to give producers greater confidence. GP explained she couldn't confirm today as the Schemes are in the process of consulting with the labs on potential measures but would update scheme participants once these safeguards have been agreed.

Update on the Resource Framework revision

RF Publication Timeline

The week before the forum, the Schemes received the final version of the interim framework. The EA has estimated publication date (unconfirmed) is sometime in November. While REAL was unable to share the document before publication, DC was able to present a summary of the changes.

The Compost Resource Framework (CRF) will be published alongside a Regulatory Position Statement (RPS) which will outline the allowed two-year transition for composters to achieve compliance with the reduced plastic limits (8% of the PAS limit).

Likely Changes (including waste codes)

The notable changes from the Quality Protocol (QP) to the RF are different allowable inputs (waste codes), reduced PC limits, and the digestate to horticulture for the ADRF.

Several waste codes are likely to be returned to the RF from the previous draft version (e.g., sludges including dairy, fruit and veg, fish and meat sludges) and the only waste codes that are currently reported to be removed are for treated wood, which the EA understands is not a major feedstock for most composters. However, DC did note that if this is not the case, composters are encouraged to contact their local EA representative.

JH queried whether glycerol waste codes have been included in the recent draft RF. DC was unsure but would check

Adoption among devolved regulators

The RFs will only apply in England. This marks a change from the QPs which also applied in Wales and Northern Ireland. NRW has indicated they are waiting to see the final published RFs before confirming if they will adopt them but likely will at some point. The Schemes' Policy team has made efforts to contact NIEA to learn whether they intend to adopt the RFs but have been unable to get through. Northern Ireland could either choose to adopt the RFs or EU legislation. SEPA has indicated that its position will not change – Scotland will continue with their separate position for end of waste and will not adopt the RFs.

Updating scheme rules alongside the RF

REAL will update the scheme rules as soon as the RF is finalised, making changes to reflect the updated terminology and technical changes – this process has already begun so the Schemes are ready to go as soon as the RF is published.

The Schemes also plan to host a webinar to outline the changes in the new frameworks and can begin working on this now that the EA has shared the final draft version of the RFs with REAL.

Q&A on Resource Framework Revision

AC voiced confusion about how PAS, the RFs, and RPS would align (noting the contradicting plastic limits in PAS and the RFs), particularly for composters near the border that produce compost to meet both the CQP and SEPA End of Waste (EoW) position. AC then asked if PAS would be updated to align with the tighter limits set out in the RFs.

GK noted that the RF rollout seemed similar to the way Scotland issued a two-year transition period to comply with SEPA's position statement, which sets an EoW plastic limit as a fraction of the PAS limits.

GP shared that PAS revision would likely commence next year but there are no firm plans just yet.

AC then queried how plastics would be reported once the new limits came into effect. GP explained that the plan for reporting is to assess against the reduced limits from day one. Therefore, some plastic results may be flagged as 'failures' to indicate that they would fail the reduced limits but will be compliant with the RPS for the duration of the 2-year transition.

JH agreed that the new documents and reporting system could be challenging for new operators to understand and queried whether the Schemes could support in any way (e.g., drafting a supplementary guidance note around the transition period, reporting, and how the documents would work together).

GP shared that the Schemes have agreed to collaborate with EA on comms around the new RFs. Specifically, the Schemes will announce changes to CCS/BCS Participants with a factsheet to explain the new system for reporting plastic results to the lower limits. As mentioned, the Schemes/Policy Team will run a webinar to introduce the new Frameworks and explain the changes. Additionally, the Schemes will host a CB Auditor Roundtable to ensure all auditors are aware of the changes.

Feedback from the last Technical Advisory Committee

GK shared the following key updates from the previous TAC:

Contamination in waste received

GK mentioned consistently raising the issue at the TAC of contamination in waste and the need to pressure LAs.

GK's meeting at Scotland Excel was positive but, like TAC, they seem unsure of how to press LAs effectively.

GK believes the system needs tightening at all stages: better information for householders, improved bin collector training, better sorting, etc. JH agreed, emphasising the need for improved communication across the waste chain (LAs, EA, composters, etc.).

With upcoming changes in allowable plastic limits in the RF, composters should renegotiate contracts with waste suppliers, aiming for reduced contamination (e.g., from 2-5% to 1%). Many contracts allow for renegotiation due to regulatory changes.

HE shared that his site is negotiating a 4-year contract with a LA, reducing contamination from 2% to 1%, in line with environmental permits. GK noted it would be illegal for HE's site to accept 2% contamination, as it breaches the EA permit, and HE confirmed this argument strengthens his position in negotiations.

Jackie C asked if now is a good time to negotiate with LAs, as contracts will expire in 18 months. She noted the lack of communication between EA and LAs and asked if REAL could provide literature to help composters in negotiations. AC mentioned REA once shared guidance with LAs on contamination and offered to send it to OD for distribution.

GK noted that in Scotland, LAs cannot count composting towards recycling targets unless it's PAS 100 and EoW certified, giving Scottish composters more leverage. English LAs may not care to negotiate if they can count compost under deployments as recycled.

MMG asked who made this decision in Scotland and who could apply pressure in other nations. GK suggested it likely came from the Scottish government and Zero Waste Scotland. JH added that Scotland and Wales focus more on the circular economy.

GP shared that REAL is aware of the issue regarding contamination levels specified in contracts and will be setting up a Working Group to address this next year.

Re-testing after stones failure

- GK reminded attendees that the issue raised to the TAC was the CCS protocol to retest for both stones and PCs after an initial stone failure. A scheme participant wanted to know why they weren't only re-tested on stones. GK shared that the TAC discussed this and explained that a sample must be retested for both as the methodology is written to test for stones and plastic.
- GK expressed understanding for composters not wanting to be re-tested on a parameter they've already passed, but this is just a feature of the method and composters can look at this as getting a bit of bonus information.

Courier delays and no-shows

- The TAC asked GK to investigate the issue of lab courier delays. GK queried whether the attendees had experienced courier issues, specifically if it was mostly a problem in rural/remote areas (or everywhere) and if the labs consistently follow-up with couriers after each instance of a late collection/delivery.
- RL, AC, AG, SW, James C, Jackie C, and SA confirmed that they'd had the same experience of unreliable couriers and many of these attendees shared that their sites were not particularly remote.
- AL and RL noted that NRM was not particularly sympathetic to these ongoing courier issues. RL shared that he's gotten into the habit of calling the lab around 2pm the day the courier is meant to turn up if they haven't already.
- Several attendees also shared that they no longer used the lab's couriers at all due to these issues. James C now uses local couriers and takes samples to the local post office. Jackie C noted that after nonconformances for courier issues, her site began using royal mail next day delivery, which is a bit more expensive but works really well and is worth paying a bit extra to get the sample in on time. SA shared that the office director of her site also got so fed up that they just began taking samples in personally.

GP shared that REAL is working to address the courier-related issues and is now awaiting some lab data to support this. While it does fall outside of scheme, REAL still aims to help if possible.

Policy Updates

Horticulture

Horticulture was a big focus at the start of the year due to the expected ban on amateur peat-use by the end of this year. However, due to the change in government with no currently available plan for the Organics sector, this is expected to be delayed. REAL aims to promote compost as a peat alternative.

Simpler recycling

Defra preparing to roll out Simpler recycling to households by March 1st 2026 including mandatory separate collections of food waste and to businesses by March 1st 2025. This policy will aim to standardise recycling and waste collection in England, with every LA collecting the same materials in the same bins. Hopefully, this will result in increased feedstocks with reduced contamination. The Schemes Policy Team are looking out for updates as the government prepare this rollout

New Government

The key policy areas outlined at start of year—peat ban, Simpler Recycling, and adoption of a UK Fertiliser Product Regulation (FPR)—are all a bit up in the air given the change of government. The Policy team is keeping eyes/ears out for updates from government on the organics sector. So far, the updates have heavily focused on the water sector. However, the Government has appointed a minister for circular economy and Defra has set up a circular economy task force (which the Schemes policy team has applied to partake). Government budgets will be published this/next week which may shed a bit of light on the direction of travel.

Research Hub Updates

Project Selection Process

The annual project selection process includes (1) an annual Call for Proposals, (2) Participant Feedback Survey (3) Phase 1 evaluation of proposals – shortlisting, (4) Phase 2 evaluation of proposals – selection.

New projects selected in 2024 are expected to be announced soon. The next call for proposals will begin again in January, and Scheme participants are encouraged to submit ideas.

Project Updates

The Plastic Method Assessment Report, which explores the current method of testing for plastics under CCS/BCS as well as alternative methods (incl. methods to test for microplastics), is due to be published in the next week or so.

The Risk Assessment Project began with a review of the hazard analysis (currently underway) as the precursor to this Risk Assessment. The Hub intends to invite tenders for the risk assessment soon and encourages all to share the invitation widely when it's published.

The Plant Response Test Improvements and Alternatives project commenced recently and is expected to last for approximately one year.

Other Developments (for Feedback)

Since the previous forum, where the Hub announced the publication of a carbon accounting methodology for composters and AD operators, the Hub is now considering whether and how to develop the project report into a user-friendly calculator tool.

The Hub is also considering several developments to the research library, including making Research Hub reports available on the platform and giving all Scheme Participants Accounts

Participants were reminded to provide feedback on these potential developments and the Research Hub more generally through the annual [Research Hub survey closing 31st October](#).

Further issues raised with CCS Producers' Representative

No further issues raised.

An opportunity to discuss other issues raised by producers

APHA Compost Sampling

APHA came onto SA's site for an audit in September and took a sample of finished compost, only sampling the surface (rather than from tunnel) to test for both E. Coli and Salmonella. SA queried if anyone else has come across this.

GK thought this was unusual, if not testing for salmonella only during the maturation stage as this part of the process is open. AC shared she'd experienced something similar – an officer sampling directly

after pasteurisation does have the freedom to choose where they sample from. AC recommended going back to the Veterinary Officer to clarify the procedures and challenge it if necessary.

Internal Audit Training Requirements (PAS 100 vs PAS 110)

AC noted that PAS 100 requires training qualifications for internal audits, while PAS 110 does not. AC needed to conduct internal audits for a few CCS sites and therefore had to take a training course to be compliant, despite her expertise in PAS 100. AC asked the other attendees if anyone was available to do an internal PAS 100 audit on an openair windrow composting site the northeast as it's tricky to find independent auditors with qualifications. AC noted some CBs more fastidious than others about it being an independent, 'suitably qualified' internal auditor. She wasn't able to do it herself as she would be auditing her own work, noting it's difficult for some sites that are often a one-man band.

GK agreed, noting that if there's a good reason a composter has to do something in-house, the CBs must find a way to accept it. As a family-run business, GK audited himself for years – if it's unavoidable there may not be a way around it. AC shared her AD sites have started getting nonconformances for this.

GP noted that REA/REAL may investigate training on internal auditing to alleviate this issue.

Jackie C shared that her site has a consultant who completes internal audits, and suggested AC search her area for environmental consultants with composting knowledge. AC shared she wanted to set up a little network of people in the NE to do audits more locally. JH also said she'd share some contacts.

AOBs

- The Schemes will be trialling a briefer 'executive summary' format for minutes, with the plan to record and auto-transcribe meeting for archival/verification purposes. Full transcript-style minutes may therefore be available to attendees on request
- Participants were reminded to complete the annual BCS Participant Survey by 31st October to help BCS continue to improve the Scheme(s)
- Upcoming webinars – Contact oliver@realschemes.org.uk to attend
 - Compost sampling: 23rd October
 - Compost Testing: 24th October
 - Interpreting Test Results: 25th October

Actions

1. REAL to share an update with producers on the Compost Quality Protocol (CQP) revision after the next Task & Finish Group (T&FG) meeting on 23rd October. Updates will cover the following topics: EWC Codes Changes, adoption of Resource Framework (RF) by Northern Ireland and/or Wales, plastic level changes.
2. REAL to update producers when scheme documents are updated to align with the implementation of the RF.
3. REAL to continue the investigation into sample collection courier issues
4. Producers to consider approaching Local Authorities to share that plastic limits are expected to be tightened in the near future.
5. OD to share AC's LA contract contaminant level documents

6. Producers to contact MG (megan@realschemes.org.uk) to raise any queries or express interest in presenting to university students through the REAL Research Hub-led webinars.
7. SA to consider contacting APHA area officer to clarify sampling procedures and challenge their approach regarding surface-only compost sampling.
8. Producers to let OD know if they have any comments on the new style of forum minutes when circulated
9. Producers to let AC know if they can carry out an internal audit for a CCS site in the North-East of England
10. REAL to further consider feedback from operators around the discrepancies across CCS and BCS in terms of requirements for training around internal auditing, and the suggestion for REAL or REA to develop a training course on internal auditing for the schemes
11. REAL to provide updates on its role in the Circular Economy Task Force