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## Scheme updates for operators

### Key Summary:

- **UPDATED PAS 110 Digestate Analysis Request Form**
- **UPDATED BCS Position on Technical Requirements**
- **Reduction in plastic limits (Scotland)**
- **Invitation for BCS Operators' Representative**
- **EA positions on seeding and dried digestate**

### **PAS 110 Digestate Analysis Request Form**

We have recently updated our analysis request form with a new field for samplers' details (version 3).

*May we also remind all operators that this analysis request form **MUST** be used from 1st January 2020 – please see this news item [here](#). Test results for samples sent without this completed form from this date will not count towards certification. You can download the form from our website [here](#).*

The BCS number and certification code(s) for each certified digestate output can be found on the certificates issued by the certification bodies. The BCS number takes on the form 'BCS0000C1' and the certification code takes on the form 'AAA-BBB-WD' (or -SL for separated liquor and -SF for fibre).

### **BCS Position on Technical Requirements**

The BCS Position on Technical Requirements document has been updated to remove sections 6 to 8 and section 10. Version 4 can be found on our website [here](#).

We have also set an implementation timeframe for complying with section 22 ('Physical contaminants testing of separated liquor'). AD operators producing certified separated liquor but not currently testing for physical contaminants due to the exemption note in PAS 110, please note that the deadline for complying with this position is **9th March 2020**.

### **Reduction in plastic limits (Scotland)**

From 1st December 2019, the plastic limit for digestate in Scotland was reduced to 8% of the PAS 110 limit. SEPA will not apply waste regulatory controls to waste-derived digestates as long as the production and usage comply with the conditions listed in their regulatory position statement, which includes this additional quality standard. You can find SEPA's full position statement [here](#).

### **Invitation for BCS Operators' Representative**

Jo Chapman has recently notified us that, since the role of operator representative has expanded over the last year, she is unable to fulfil all of the commitments associated with the role. Jo has been the

representative since May 2017 and her contributions to all meetings have been invaluable. In light of this, we are now looking to invite operators to nominate themselves as the new representative.

Through fulfilling this role, you will be attending the Operators' Forum and representing operators at the TAC, Research Hub's Research Panel, and REAL's Market Development Working Group. The role of the representative is important in ensuring that operators' views are shared and considered with respect to scheme developments, and the schemes' R&D and market development work.

Jo Chapman would step down to pass the role on to another person who is able to commit to the role in its totality or would be willing to work with somebody else to fulfil the role requirements jointly.

If you would like to nominate yourself as the BCS operator representative, or would like more information about the role, please email us on [info@realschemes.org.uk](mailto:info@realschemes.org.uk) before Friday 31st January.

### **EA positions on seeding and dried digestate**

During a recent Biowaste Regulatory Forum meeting, the Environment Agency (EA) clarified positions on seeding AD facilities during the commissioning phase. Sewage sludge cannot be used as feedstock or seeding material by plants intending to produce ADQP certified digestate (under the BCS), and this includes where the plant has an environmental permit or other authorisation in place. As a result of this, section 10 has been removed from our BCS position on Technical Requirements document. Additionally, AD operators cannot use ADQP certified digestate as feedstock or seeding material during the commissioning phase, for seeding and feeding a digester is not a designated market in the ADQP.

Following our recent TAC meeting, the Environment Agency has confirmed that dried digestate / dry separated fibre is not included in the ADQP with an approved and designated market. The QP only covers separated fibre that needs no further treatment. Drying is considered further treatment. It is therefore not possible to achieve certification to the ADQP for this material, under the Biofertiliser Certification Scheme, for 'product' status in England, Wales, or Northern Ireland. Though dried digestate / dry separated fibre would be considered for inclusion to the ADQP in the review process if appropriate evidence is submitted during the call for evidence period.

Please email [info@realschemes.org.uk](mailto:info@realschemes.org.uk) if you would like us to add any contacts to our mailing list.

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