

## Summer 2025 Summer Newsletter



### Operators' Forum and TAC

The BCS held an Operators' Forum on 21st May, welcoming several returning participants as well as new attendees. Discussion centred on key updates to the draft AD Resource Framework (ADRF), its possible publication timeline, and the implications for scheme participants and other stakeholders. The EA was aiming for a June publication date for the ADRF, and BCS confirmed ongoing engagement with the EA on finalising the RF. Concerns were raised regarding how the EoW criteria may affect digestate storage infrastructure compliance. In particular, the concern that "end of waste achieved at point of dispatch" would cause issues for AD operators trying to store material with no designated end use was raised at the TAC. A representative from the EA provided additional contextual information regarding the point at which end of waste is achieved, and TAC members were invited to submit any further queries after reviewing the meeting minutes.

Digestate sample courier challenges were raised again. Attendees shared examples of inconsistent laboratory communications, particularly regarding sample receipt notifications and the provision of interim reports. BCS affirmed its commitment to responding to these issues and informed the forum that guidance on depot drop-offs has been issued. An action from the March 2025 TAC was for REAL to continue exploring potential options for operators to take samples directly to a depot in order to avoid courier-related issues. Since then, BCS has discussed courier depot drop-off with the Approved Labs and published a guidance document explaining the process for scheme participants.

There was also discussion regarding the requirements for internal QMS auditing and associated training. BCS clarified the PAS100 and PAS110 requirements and informed attendees of plans to further discuss the topic of QMS auditing with the certification bodies, sharing any further updates at the next forum. BCS is considering the creation of an internal QMS auditing training course either in-house or to refer to another organisation.

There was strong interest at the TAC in the future of digestate-derived products such as dried fibre and pellets. These are not currently covered by PAS 110 and often require individual end-of-waste determinations. BCS confirmed that initial discussions with BSI have begun on reviewing PAS 110.

### July ADRF Producers' Forum

Despite the expectation of June publication, the EA later announced that the AD Resource Framework would instead be published on 4th August, giving five weeks' notice to the scheme and its participants. In response, BCS held a dedicated Operators' Forum in late July, focused solely on the RF changes and how these would be integrated into the schemes.

Attendees voiced significant concern regarding the lack of a transition period and the short notice period. There was particular concern about the revised End of Waste point which was changed from the receipt of a passing PAS 100 result to the point of dispatch to customer, and how this would impact producers storing unsold material. BCS responded that they would continue the discussion with the EA regarding these issues.

Shortly after this Forum, the EA delayed publication of the RF in order to resolve last minute issues, including the above. A new publication date has not yet been confirmed.

### Labs reappointed with new T&Cs

BCS is pleased to confirm that NRM and Eurofins were reappointed with the new 2025 Laboratory Terms and Conditions at the beginning of the year. These reappointments reflect each laboratory's ongoing commitment to quality and reliability in delivering scheme-approved testing services.

The schemes have been reaching out to new laboratories and are committing to increasing test capacity on the scheme.

The 2025 version of the Lab T&Cs can be found on the BCS website [here](#).

### Certification Body tender

The tender process for BCS Certification Bodies (CBs) formally commenced in May 2025. Invitation documents were issued directly to all existing CBs and other organisations that expressed interest and was advertised via BCS's usual communication channels.

The process is expected to conclude in autumn, with new contracts awarded in winter 2025. All newly appointed CBs will be contracted from the start of 2026 and will be appointed for a three-year term. BCS will provide further details to scheme participants once the appointments have been confirmed.

### Circular Economy Taskforce

In November 2024, the Circular Economy Taskforce was established as an independent expert advisory group to support the government in creating a circular economy strategy for England. There are five key workstreams they are focusing on, which include:

- Agri-food
- Chemicals and plastics
- Construction
- Textiles
- Transport

The BCS has met with members of the Taskforce and the Agri-food group in particular where we reinforced the need for high quality standards and certifications to provide confidence and trust in products derived from waste. We hope to have further conversations and to continue contributing to this work given its importance to the BCS as well as the wider organics industry. The circular economy strategy is scheduled for publication towards the end of 2025.

### Updates on Ongoing Project

*Project 7: Risk assessments updates for compost and digestate to inform Compost Quality Protocol and AD Quality Protocol revision.*

This project aims to provide up-to-date information on the relevant risks associated with compost and digestate to inform the revision of the EA's Resource Frameworks.

WSP was appointed as the contractor for this project in March, and since then the project team has completed a rapid evidence assessment, and with the Steering Group, has identified the hazards to be taken forward for Risk Assessment.

'Exposure scenarios' are in development, which will be completed for all the hazard groups identified, and these scenarios will be used to characterise the risk in each case to human, animal and plant health. The project is scheduled for completion in November 2025.

*Project 8: Appraisal of the impact on digestate quality with a final screening step, from introduction of a smaller screen size.*

A number of AD operators have responded to the prospect of decreasing plastic limits in digestate by using finer screens at the end of the process to remove plastic contaminants. However, it is not known what effect this change to the screening process has on digestate overall.

This project aims to close the information gap on what changes to digestate result from introducing a finer screen.

Currently, the Hub is working with the Steering Group to refine the aims and methodology of the project before putting it out to tender.

• Questions? Contact Jackie Robinson – [jackie@recc.org.uk](mailto:jackie@recc.org.uk)

*Project 9: End-of-waste case information for digestate derived products*

This project aims to enable the inclusion of a broader range of end-products and their designated market scope in the Environment Agency's AD Resources Framework.

The project's key objective is to research and compile information on a range of digestate derived products in terms of how they can be used, the demand for them and how each of them compares to a suitable non-waste comparator.

The University of Southampton was appointed as the contractor, and work began, in May 2025.

Since then, the Steering Group and the project team have been working together to finalise the scope and methods of the project, and the project team has been reviewing all relevant policy and regulatory documents.

### Project Selection 2025

The Research Hub received 5 project proposals this year. Schemes Participants were invited to feed back on the proposals via the annual survey, which closed on 13 June. Participants' responses informed the Research Panel's decision-making during the meetings to select proposal(s) for funding, which took place in June and July.

During the summer meetings, the Research Panel shortlisted two proposals. The panel will meet again in the autumn to make the final decision on which projects to take forward.

### Courier depot drop-off guidance

A new guidance document on courier depot drop-offs, designed to support operators in ensuring timely and compliant sample deliveries has been published on the BCS website. It explains how scheme participants can deliver samples to courier depots directly, to increase operator control over their own samples.

### Lab application form

BCS has released an updated Laboratory Application Form, reflecting current test methods used under the scheme. The latest version of the application form can be found on the BCS website [here](#).

### Annual report 2024

REAL has published its seventh annual report for the Biofertiliser Certification Scheme, offering a detailed overview of Scheme activity and key developments across 2024.

The report highlights continued resilience and engagement from the AD sector, with a total of 106 certified BCS processes in operation across the UK by year-end. The geographical breakdown reveals 78 processes in England, 13 in Scotland, 8 in Wales, and 7 in Northern Ireland.

Alongside BCS updates, the report includes a summary of the Compost Certification Scheme's status over the past year, as well as the 2024 Research Hub Annual Report, which provides updates on funded projects and emerging research themes.

We encourage all participants and stakeholders to explore the document, which captures the year's developments, as well as the ongoing efforts to support robust, evidence-based certification across the sector.

### Test method working group

The newly formed Test Method Working Group held its first meeting in June 2025 at the REAL Office in London, with online participation for other attendees. The group brings together a broad range of stakeholders from REAL, approved laboratories, and environmental regulators to support the revision and continuous improvement of key analytical methods used within the CCS and BCS.

The meeting focused on the Physical Contaminants and Sharps (PC&S) test methods, reviewing current methods, identifying issues, and evaluating evidence for potential improvements. The Terms of Reference for the group were agreed, and participants began planning the methodology improvements that will be further reviewed at the next meeting, scheduled for September 2025.

These ongoing discussions aim to ensure method consistency, reliability, and alignment with the intentions of the PAS limits and test methods.

### Resource Framework Publication Delayed

The Environment Agency has announced a further delay to the publication of the AD Resource Framework (ADRF), which was scheduled to be published on 4th August 2025.

The delay has been implemented to address ongoing concerns regarding the point at which waste material meets 'end-of-waste' criteria. As highlighted in the July BCS Operators' Forum, scheme participants had raised significant concerns about the revised End of Waste point, particularly how the change from receipt of a passing PAS 110 result to the point of dispatch to customer would impact AD operators storing unsold material. The EA's decision to delay publication reflects their commitment to resolving these critical implementation issues before the framework comes into force. This follows extensive feedback from the BCS and its operators regarding the practical challenges that would arise from the proposed changes, especially given the lack of a transition period.

At present, we do not have further information on the duration of this delay or whether other aspects of the framework will be revised. BCS remains in active dialogue with the Environment Agency to ensure that when the framework is eventually published, it is workable for scheme participants.

We will continue to keep participants informed as more information becomes available. In the meantime, current Quality Protocols remain in effect.

For any questions regarding the Resource Frameworks, please contact our policy manager at [duncan@realschemes.org.uk](mailto:duncan@realschemes.org.uk).

### Annual Regulator meeting

Every year, the BCS aims to have annual meetings with the four national regulators of the UK, the Environment Agency (EA), the Scottish Environmental Protection Agency (SEPA), Natural Resources Wales (NRW), and the Northern Ireland Environment Agency (NIEA)/Department of Environment, Agriculture and Rural Affairs (DAERA).

At the beginning of 2025, we had very productive meetings with the EA and SEPA. We then followed these up with a meeting with NRW in July. In these meetings, we provided an update on the BCS, the latest from the Research Hub and the projects that are either underway or completed, and an update on the relevant policy areas (for example, discussions on an expected ban on the use of peat in horticulture). Looking at the NRW meeting in particular, we discussed their position on the AD Resource Framework and how the BCS can and will certify AD following the publication of the Framework. With the delay to this publication, we remain in conversation with NRW to stay up to date on their position.

We are still keen to confirm our meeting with the NIEA/DAERA. Once these individual regulator meetings have concluded, we intend to host a meeting with all four national regulators together to go over the key topics raised in these meetings that would benefit from group discussion. This joint meeting is expected to happen towards the end of the year.

### Other policy updates

**Simpler Recycling:** The first phase of the Simpler Recycling reforms has been rolled out. From the 31st March 2025, non-municipal households, such as businesses, hospitals and schools among others, are required to have collected their food waste, dry recycling and residual waste separately. The key requirement to note is that food waste must be collected weekly, with the large majority of this separated material going to AD for organic recycling.

For domestic households, this won't be a requirement until the 31st March 2026, though it is still important to understand what is required to be prepared to comply when this date comes around to ensure that the right materials are placed in the right bin.

Work is being done on the BCS to ensure the Scheme is prepared for this rollout and to be aware of any changes the Scheme needs to make to be ready. For example, it is expected that the supply of feedstock to AD processes in England will significantly increase. Therefore, the BCS, through the approved labs and certification bodies, will need to be prepared for the associated influx of sampling, testing, and output on the Scheme once 31st March 2026 hits.

