

BCS Newsletter July 2026



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Keep up to date: News and Guidance

As a reminder, our [News](#) and [Guidance](#) sections on the BCS website are both regularly updated throughout the year. News covers scheme announcements, regulatory developments and upcoming events, while Guidance hosts our library of practical notes on topics such as sampling, labelling, and End-of-Waste requirements.

Both pages are worth checking back on regularly as content is added and refreshed.

CBs reappointed under new contracts

Operators' Forum and TAC

The second Operators' Forum for 2026 met on Tuesday 5th May, followed by the Technical Advisory Committee on 25th June. These meetings remain our primary vehicle for ensuring that the questions, feedback, and requests of AD plant operators directly inform technical and regulatory discussion at the Technical Advisory Committee. The forum was well attended, with 9 BCS participants represented, in addition to REAL staff.

Our 2025 annual participant survey, with responses reviewed this year, continues to underscore the importance of the Forum. One respondent noted that the forum provides an "invaluable platform in which to discuss all aspects about the BCS".

A number of core operational and regulatory concerns raised by AD operators during the session were subsequently carried forward to the TAC meeting on 25th of June by the BCS Operators' Representative.

Operators engaged in a discussion regarding the scheme's draft position on whether an independent consultant who has designed or amended a site's Quality Management System can later execute that site's internal QMS audit. It was noted that a rigid restriction presents several hurdles. At the TAC, stakeholders evaluated three potential interpretations of the relevant PAS 110 clauses produced by BCS, in response to a wide range of scheme stakeholder feedback. Support was recorded for an interpretation that treated the internal audit as a check of day-to-day operational compliance with the QMS, rather than an assessment of the QMS's design, meaning a QMS-author would not, on this reading, be auditing their own work. However, we are currently seeking final comments, so will conclude the TAC discussion over the next several weeks. Wording is being finalised to apply generically rather than referring specifically to consultants, with a formal position expected to follow before the end of July.

The forum also discussed laboratory reporting formats under the two-year grace period of Regulatory Position Statement 317. Operators commented on the fact that test reports continue to display a failure against the newer, permanent physical contaminant thresholds, even if a plant is registered as being exempt from the reduced limit, requiring manual clarification to auditors. This was reported to the TAC. BCS will be exploring this issue further with the BCS operator representative.

At the forum, queries were raised regarding the wording within section 2 of the Anaerobic Digestate Resource Framework. Operators highlighted that the phrase "anaerobic treatment of solid wastes" creates substantial confusion for liquid-only facilities, noting that the word "solid" does not appear in that specific European Waste Catalogue chapter heading. Furthermore, operators noted that the current wording for code 19 06 06 legally blocks the transfer of unpasteurised material between sites for seeding purposes, which represents a barrier to plant operations that seems possibly unintended. At the TAC, the Environment Agency responded directly, confirming that the restrictive wording was likely a mirroring error

Following a productive 2025, BCS is pleased to announce the successful conclusion of the Certification Body tender process.

We received five tenders in total, all of which underwent a rigorous evaluation by the BCS team. This comprehensive review process involved detailed Q&A sessions and formal interviews, ensuring that the selected bodies continue to meet the high standards required to uphold the integrity of the scheme.

The quality of the submissions was high, and we are delighted to report that all incumbent CBs presented excellent tenders and were re-contracted at the start of the year for the new term.

Annual report 2025

BCS published its ninth annual report in March of this year, providing an overview of the scheme and a summary of developments and activities in 2025.

We encourage you to view the full report for a comprehensive overview of the schemes [here](#).

Test Method Working Group

The REAL TMWG has completed its first project and published a final summary report. The project focused on revising the Physical Contaminants & Stones (PC&S) test method for digestate, in part given the lower plastic limits introduced in the Anaerobic Digestate Resource Framework (England) and End of Waste position GN023 (Wales).

Following a stakeholder consultation in late 2025, the TMWG agreed on three key technical changes to the BCS PC&S method: standardising the cleaning of contaminants prior to weighing using a soft bristle brush to ensure more accurate mass measurements; increasing weighing precision from 2 to 4 decimal places and reporting to 3

carried over from the Compost Resource Framework, and committed to verifying this formally with their technical team.

The BCS will be holding another forum in October 2026, and we'd love if you could join us then. More details on the exact date of the forum will follow in our August bimonthly which will be sent to all scheme participants.

decimal places to provide better resolution for the reduced plastic limits; and introducing a multi-person confirmation process for identifying sharps to reduce subjectivity.

The TMWG is scheduled to reconvene later in the year to discuss further work on plastics testing and other potential projects. The full Project 1 Summary Report is available on the BCS website [here](#).

Scheme participants to provide feedback on RS 122

Please note if your process is based in Wales and you are utilising RS 122, NRW encourages you to provide feedback, either directly to NRW, or to REAL via your Certification Body, on any issues you are experiencing in working towards meeting the reduced plastic limit. If you consider that an extension would be needed beyond the current December 2026 withdrawal date for RS 122, please detail the reason(s) for this. Providing this information is entirely voluntary and will not affect your certification. This is purely to gather scheme-level insight into RS 122 usage.

Simpler Recycling reforms

In 2025, the Simpler Recycling reforms were introduced in England for businesses and other non-municipal premises. These reforms standardised the collection of recyclable materials and, most notably, introduced a mandatory weekly food waste collection.

From 31st March 2026, the reforms were extended to households, with local authorities across England now required to provide weekly food waste collections. Rollout has been irregular in the short term: roughly a quarter of English councils are operating under transitional arrangements, while they secure funding, vehicles and depot

New Scheme documents

Scheme Rules

An administrative update has been introduced for the Biofertiliser Certification Scheme rules. This revision applies an updated Version Control Number (VCN) to the document. No alterations have been made to the core text or the underlying requirements of the scheme. However, all scheme participants were required to update their internal records to reflect the updated VCN in relation to scheme rules v6.2. The latest version is now available on the BCS website [here](#).

Technical Positions

The BCS technical position document has been updated to ensure continued regulatory alignment and clarity for participants. This revision introduced important updates, notably the addition of explicit references to the End of Waste position requirements specified by Natural Resources Wales and the Scottish Environment Protection Agency.

Additionally, the document has been expanded to include the following 5 new sections.

- Section 18 covering changing the screen to decrease the aperture size
- Section 19 covering testing digestate made from the producer's/co-operative's own materials and used by the producer/co-operative for physical contaminants
- Section 20 regarding co-storage of certified liquid digestate outputs produced by the same operator on the same site
- Section 21 outlines the Scheme position on PAS 110 training
- Section 22 outlines the Scheme position on internal auditor training

The latest BCS Position on Technical Requirements document can be found [here](#) and the marked-up version showing all changes can be found [here](#).

Checklists

The Biofertiliser Certification Scheme audit checklist has been revised to ensure continued alignment with Version 6.2 of the Scheme Rules and the updated BCS position on technical requirements document. This updated version introduces specific checks for the new positions regarding the evaluation of training records and competency evidence for HACCP, PAS 110, and internal auditing. The revised checklist can be downloaded from the BCS website [here](#).

capacity. Coverage should continue to broaden over the coming months and years as these arrangements resolve.

The BCS expects the majority of this additional food waste to be sent to anaerobic digestion, which remains the preferred method for recycling organic waste. However, the reforms also allow for the co-mingled collection of food and garden waste, and a number of local authorities have opted for this approach. As a result, compost producers operating In-Vessel Composting facilities may see an increase in available feedstock in certain areas as household collections increase.

Ultimately, the aim of the reforms is to improve the quality of material supplied to certified AD operators. With significantly reduced contamination, this should lead to the production of higher-quality certified biofertiliser.

The BCS continues to evaluate the Scheme's operational capacity to ensure that any increase in certified materials can be managed effectively as the household rollout beds in.

The Circular Economy Growth Plan (formerly the Circular Economy Strategy)

In November 2025, it was announced that publication of the Circular Economy Strategy, since rebranded as the Circular Economy Growth Plan, had been delayed, with an updated release date expected to be confirmed.

In May 2026, over 50 businesses and trade bodies wrote to Defra urging publication without further delay. As of a Parliamentary written answer on 15th June 2026, Defra confirmed its intention to publish the Growth Plan but has not yet set a firm date. We will share the confirmed date as soon as it is announced.

During the second half of 2025, the BCS carried out extensive engagement with members of the Circular Economy Taskforce, with a particular focus on the Agri-Food

A third Lab has joined the BCS Laboratory Approval Scheme

We are pleased to announce that the Biofertiliser Certification Scheme has expanded its laboratory network with the recent appointment of a third approved laboratory, Livelab. This appointment strengthens the overall testing capacity of the scheme, ensuring a more robust and resilient service for all participants, as well as improved geographic coverage.

Full contact details and service offerings for all three approved laboratories can be found on the BCS website [here](#).

workstream; one of the five priority areas identified by the Taskforce as having strong potential to develop circular economy models.

Our aim was to highlight the role that standards and certification can and ought to play in developing a circular economy. Through these processes, manufacturers, producers and consumers alike can have trust that certified products behave in the way they're supposed to, and that there is sufficient transparency in their production and disposal.

The BCS continues to await publication of the Growth Plan and its accompanying sector roadmaps, which will set out the future direction of travel for the organics industry.

Non-waste AD and Manure Derived Digestate

Non-waste digestate and Manure-Derived Digestate (MDD) have received a lot of attention within the last 12 months. Certain court judgements, alongside ongoing court proceedings have and will have a significant impact on how non-waste AD and MDD are processed and potentially on what controls are placed on the resulting digestate.

The Scheme will continue to monitor current events as well as the wider conversation on this topic as the year progresses.

UK FPR Consultation

In June, the BCS responded to Defra's consultation on the UK Fertilising Products Regulation (FPR), which sets out proposals to reform fertiliser regulation across the UK and considers how compost and digestate might be brought into scope.

A central part of our response emphasised the existing quality assurance architecture of the BCS; noting its legacy of efficacy, demonstrable consistency, and strong working relationships with stakeholders from industry and regulators.

New T&Cs issued for Approved Labs

BCS issued [Version 10 of the Terms & Conditions](#) for Approved Laboratories after consultation with the labs and CBs, which came into effect in January 2026. The most significant update is a shift in how laboratory performance is monitored. While assessments against the T&Cs were previously conducted by independent auditors on behalf of the scheme, these audits are now conducted directly by BCS using internal processes. This change is designed to provide the scheme with greater oversight of laboratory performance and technical competency.

To further strengthen the reliability of test results, the 2026 T&Cs introduced stricter requirements for Proficiency Testing. Laboratories are now required to participate in a specific PT programme, the Wepal MARSEP programme, for Potentially Toxic Elements. Laboratories must now share records of any investigations or corrective actions resulting from these proficiency tests directly with BCS. These measures ensure that any technical issues are identified and resolved promptly, maintaining the integrity of the data used for certification.

The new T&Cs also introduced formal timescales for complaint handling. Laboratories are now required to acknowledge complaints within one week and provide regular progress updates for any ongoing issues. These changes aim to improve communication between operators and laboratories, ensuring that any concerns regarding testing are addressed transparently and efficiently.

All BCS Approved Laboratories and their subcontractor laboratories have now been audited for 2026 against the latest version of the T&Cs. All labs continue to meet the requirements and remain approved to carry out testing for the Scheme.

The consultation noted that an evidence base would be needed to support the inclusion of digestate within the FPR scope. Our response highlighted that the BCS provides that evidence base through a substantial body of technical and test report data demonstrating both the reliability and quality of certified quality biofertiliser and the processes that produce it.

SEPA position implementation

In Scotland, the Scottish Environment Protection Agency (SEPA) updated their EoW position for digestate, titled '[WAS-G-DEF-07](#)', last year. This document replaced the previous position and sets out updated EoW criteria for digestate. To reflect this change, BCS Scheme Rules Annex 4 was updated accordingly. The latest version of the SEPA position can be found in Scheme Rules version 6.2, available to download from the BCS website [here](#). Audits continue to be conducted against the new EoW position and BCS Scheme Rules.

NRW position implementation

In late 2025, Natural Resources Wales published a new End-of-Waste position for digestate, 'GN023', which aligns closely with the Resource Framework introduced in England. Alongside this, NRW issued RS 122, which introduced a transition period for meeting reduced plastic limits, valid until December 2026 (unless withdrawn sooner). Unlike the registration process in England, RS 122 applies automatically to processes in Wales. BCS Scheme Rules Annex 2 was updated accordingly and can be found appended to Scheme Rules version 6.2, available on the BCS website [here](#). Audits continue to be conducted against the new EoW position and BCS Scheme Rules.

Environmental Regulator Liaison Meetings

Two productive liaison meetings took place between the BCS, the Renewable Energy Association (REA), the Environment Agency, and Natural Resources Wales across June and July. These ad hoc sessions provided a valuable space to discuss a range of technical and operational matters, including scheme rules processes, the progress of the Research Hub's risk assessment project in relation to the upcoming ADRF Task and Finish Group meeting, the potential use of biochar in anaerobic digestion, and queries regarding the interpretation of ADRF requirements. Our discussions focused heavily on collaborative working, particularly around upcoming document reviews and the Research Hub risk assessment report.

The meetings demonstrated continued positive engagement with both regulators, which will be maintained through the upcoming Biowaste Regulatory Forum and the Task and Finish Group meetings for the resource frameworks. We were informed that the first T&FG meeting is likely to take place over the next few months, and the BCS will be represented on this group.

Research Hub Updates

The Hub and the Resource Frameworks

With the publication of the EA's interim compost and AD Resource Frameworks last autumn, it is an exciting time for the organics recycling industry. The Research Hub exists to help producers and operators by commissioning projects which inform regulatory reform, promote the sector, and foster innovation and growth. The Hub's Project 7 (Risk Assessments) is a direct response to the EA's changing End of Waste Frameworks, and the project timeline has been aligned with the revision window of the RFs in 2026. The Hub's Project 9 will provide information about the end of waste case for digestate-derived products, which is highly relevant to the EA's ADRF revision.

Project 7: *"Risk assessments to inform the revision of End of Waste Frameworks for compost and digestate"*

The aim of Project 7 is to produce Risk Assessments which inform the revision of the CRF and ADRF. Since March 2025 the project team from the global consultancy firm WSP has been working closely with the project steering group, which comprises representatives from industry and the EA. The project has three stages:

1. Gap Analysis

Beginning with the QPs and a 'Hazards of Interest' document compiled for the Research Hub, the project team completed a Rapid Evidence Assessment (REA) literature review. The review prioritised hazards/hazard groups which have previously been flagged as needing further evaluation, or where new standards or evidence suggest a hazard needs (re)assessment. The review identified a list of hazards/hazard groups which the project team recommended to be taken forward to the Risk Assessment stage of the project, alongside justification for inclusion/exclusion. The project steering group and key external stakeholders (chiefly academics and regulators) were consulted on the list of hazards to be taken forward.

2. Risk Assessment

The project team (in consultation with the steering group) designed 'exposure scenarios' to evaluate the list of hazards against. These exposure scenarios consider realistic, potential high-risk pathways for human and environmental contamination and encompass the composting and AD processes from feedstock to End of Waste. Hazard and exposure assessment form part of this stage of the project: critical thresholds and parameters for priority hazards were defined, alongside estimates of human and environmental exposure. Hazard and exposure assessments were combined to characterise risk for each scenario.

3. Project Finalization

The findings of the completed risk assessments were synthesised into a risk matrix, alongside reporting on key conclusions, areas of remaining uncertainty, and recommendations for acceptable use/ risk management. The draft report is currently being peer reviewed to

assure the quality and robustness of the findings. The final draft report will be presented to the steering group in time for the EA's revision of the RFs.

Project 9: “End of Waste case information for digestate derived products”

The project has compiled an end of waste case for post-processed waste-derived digestates to inform the revision of the ADRF, which begins later this year. It considers AD-relevant product types that are in the EU Fertilising Products Regulations and its AD-relevant Delegated Act(s) that were not within the scope of the ADQP.

This project is contracted to a team from the University of Southampton, who have compiled information on the policy, standards and legislation relating to digestate and end of waste criteria. The project is also gathering data on the current practices for deriving products from digestate, assessing these products' marketability, and comparing them with suitable non-waste digestate derivatives.

In June, the project team fed into REAL's response to Defra's consultation on the UK Fertilising Product Regulations, making the case for digestate-derived organic fertiliser products.

This summer, the project team completed an industry report which will contribute to the project's final report. The team contacted around 60 individuals and organisations involved in treating waste-derived digestate. Responses came from UK technology providers, AD operators, trade associations, investment companies, consultants, and farmers.

The project is due to wrap up this September, in time to inform the EA's revision of the ADRF.
