

# Biofertiliser Certification Scheme Operators' Forum

## Minutes

4<sup>th</sup> November 2025

### Attendees

- Jane Hall (JH) – Chair
- Georgia Phetmanh (GP) – REAL BCS
- Oliver Dunn (OD) – REAL BCS
- Grace Egan (GE) – REAL Research Hub
- Duncan Craig (DC) – REAL BCS
- Alison Inglis (AI) – BioteCH4
- Angela Cronje (AC) – Roots Organics
- Comfort Tevera (CT) – BioteCH4
- Daniel Smith (DS) – Biocon Group
- Donald Macmillan (DM) – Comhairle nan Eilean Siar
- Elisa Gioacchini (EG) – RenEco
- Isaac Carswell (IC) – BioteCH4
- Jo Chapman (JC) – BCS Operators representative
- Janine Barter (JB) – Olleco
- Lee Dobinson (LD) – BioteCH4
- Russell Bryant (RB) – Material Change
- Sam Hinton (SH) – GMT Energy
- Tom Crombie (TC) – Wykes Engineering

### Acronyms

ABP – Animal by-product	NMP – Nutrient Management Plan
ABPR – Animal By-Products Regulations	NRM – NRM Laboratories
ADBA – Anaerobic Digestion and Bioresources Association	PC&S – Physical Contaminants and Sharps (test method)
APHA – Animal and Plant Health Agency	PTE – Potentially Toxic Elements
CIWM – Chartered Institution of Wastes Management	QP – Quality Protocol
DEFRA – Department for Environment, Food & Rural Affairs	RBP – Residual Biogas Potential
LA – Local Authority	RF – Resource Framework
MDD – Manure-Derived Digestate	RPS – Regulatory Position Statement
NIEA – Northern Ireland Environment Agency	RH – Research Hub

## Welcome

OD opened the meeting, welcoming attendees and outlining the programme. JH invited operators to propose items for later discussion. No additional items were raised.

## Previous Meeting Minutes

JH confirmed no amendments were proposed to the minutes of the previous meeting. The minutes were accepted as accurate.

## Updates on the BCS

### Updates on actions from the previous meeting

#### **GE to feed back to next meeting on results of RH participant survey 2024**

GE updated the group on the RH participant survey, noting that the 2024 results had been fed back. The action was closed.

*Action 2: GE to feedback outstanding annual feedback survey information (data from both the 2024 and 2025 surveys).*

#### **GE to consider the production of a newsletter or pamphlet covering the work of the Hub, with a focus on outcomes of projects, to inform operators what they've funded to date**

GE also confirmed that work continues on a potential RH newsletter or pamphlet summarising outcomes of completed projects; this action remains open.

*Action 1: GE to continue overall Research Hub (RH) promotion and comms*

#### **OD to re-survey operators regarding holding the October Forum meeting in-person rather than online**

OD explained that the proposed in-person forum was postponed due to RF-related priorities.

*Action 4: BCS to consider holding an in-person forum in 2026.*

#### **DC to raise the issue of "point of dispatch" and EoW status clarity in the next T&FG (Task and Finish Group) meeting**

DC confirmed that the previous action relating to raising "point of dispatch" and associated EoW clarity at the new Task and Finish Group meeting was no longer relevant as no such meeting took place.

#### **DC to ask EA (Environment Agency) about non-scheme AD plants accepting chicken litter and whether they have been kept up to date with the latest ruling and its implications**

A discussion followed regarding the EA's position on manure-based digestates and the implications of the MDD court ruling on non-scheme AD plants accepting chicken litter. DC fed back that the EA had reported working on an MDD RPS though there has been no update on this in some time. AC noted inconsistency in past communications from the EA about whether MDD would be included in waste controls or not.

JC highlighted previous commitments around including manure-based digestates within the QP review, which had since stalled. JH proposed removing the original action but establishing a new standing item to monitor RF-related developments.

*Action 3: BCS to consider manure-based digestate -and other potential RF changes such as digestate drying, pelletisation, expansion of digestate to horticulture, and any further changes to point of dispatch requirements- in relation to Scheme operations and future PAS 110 review plans in 2026.*

*Action 5: BCS to monitor progress on regulatory discussions around manure-based and non-waste AD to identify if there is an opportunity for non-waste digestate certification.*

**DC to check if plastics include “biobags” in the context of the ADRF and RPS**

DC confirmed that biobags and compostable plastics are already accounted for within ADRF certification requirements; in section 2, there is a note that has all the industrially compostable certifications that any plastic must be compliant with. The action was closed.

**OD to feedback JC's question regarding whether plastic test methods can determine the difference between compostable and non-compostable plastics, and if separate counts for each type would be viable, to the REAL (Renewable Energy Assurance Ltd.) TMWG (Test Method Working Group)**

OD fed back that the TMWG had considered whether plastic test methods could distinguish compostable from non-compostable plastics. It was discussed, but deemed beyond the scope of the current project, which is looking to revise existing test methods, while a compostable plastic method would be the development of a whole new method. No changes are planned at present.

AC expressed a strong interest in a Research Hub project examining the suitability of compostable plastics in AD.

*Action 8: AC, JH, and GE to jointly explore a Research Hub proposal on the suitability of compostable plastics or biobags in AD, including the appropriate process for facilitating incubation and workshopping of the project idea.*

*Action 9: GE to investigate Hub process for helping facilitate 'incubation'/'workshopping' of this compostable plastic/biobag project idea.*

**BCS to consider holding an ad hoc meeting for operators to discuss the RF changes (once published) and their implementation into scheme operation.**

OD confirmed that the July special RF forum and the joint REAL–REA webinar fulfilled the earlier action to hold an ad hoc RF meeting. Action closed.

**DC to confirm whether mobile plant permit revisions apply to just the standard rules or bespoke permits as well**

DC summarised DEFRA’s consultation on mobile plant permitting reforms, noting likely expansion of permitting requirements to non-waste AD sites. DM provided the Scottish perspective on waste versus non-waste definitions. Operators discussed potential implications for future PAS110 revisions. A watching brief will be maintained.

**DC to reach out to WRAP (Waste & Resources Action Programme) contact regarding unusually high deferral rates for food waste collections amongst LAs regarding Simpler Recycling**

DC confirmed that 32 LAs in England have long transitional agreements on food waste collection, some lasting into the 2040s. JH noted that this was disappointing but expected. Action closed.

**DC to ask regulators about whether all changes brought in by the publication of the RF will be adopted across UK nations (Wales, Northern Ireland, Scotland) and confirm with operators after regulator meetings held**

DC updated attendees on whether RF changes would be uniformly adopted across UK nations. He confirmed that NRW and NIEA remain aligned with the QP and that communications will be issued as regulators update their positions.

**GE to write RH updates suitable to send to operators at the point that their participation renewal Purchase Order (including the research fee) is raised**

GE confirmed that RH updates at the point of PO renewal remain an ongoing action.

**BCS to consider how to address the lab and testing-related issues raised by operators at the forum, including through sharing their feedback with the labs directly**

GP reported that operator feedback on laboratory communications and customer service had been passed to the labs. This action was completed.

**AC to forward email sent to NRM to GP regarding the PTE results from 2024**

AC confirmed that PTE-related correspondence had been forwarded to GP.

## **E. coli safeguards**

GP presented detailed updates on safeguards introduced after the E. coli incident including new laboratory terms and conditions, staff training, subcontractor audit requirements, and future inclusion of data-provision clauses.

The group discussed challenges and experiences with pathogen testing and laboratory communications. AC emphasised the critical nature of ABP-related tests being reported to the APHA, noting that missing results, such as those from NRM's subcontracted lab, could have serious operational implications. EG highlighted that some results were still pending as of late September, and GP confirmed an action to raise reporting issues with the laboratories. DM and JC shared contrasting experiences: DM defended NRM's communication around sample delays, particularly in remote areas, while JC highlighted gaps in notification from SciTech during temporary closures, which had caused issues for operators relying on pathogen testing for revalidation.

The discussion acknowledged that while some participants reported the labs being communicative, others reported missed communications. Participants agreed that constructive feedback should be provided to laboratories to improve communication and compliance with ABPR requirements. AC noted that clarifying ABPR rules with labs had been necessary to prevent inadvertent failures, and OD emphasised the ongoing need to share experiences to enhance laboratory processes and reporting practices.

*Action 12: BCS to follow up on ABP pathogen testing reporting issues with the approved labs.*

*Action 14: BCS to feedback experiences regarding lab communications and customer service issues at next Lab Quarterly meeting relating to miscommunication of SciTech closure while still accepting samples..*

*Action 13: BCS to investigate the application renewal forms with the to check if they need to be updated to include the option for certification to the ADRF.*

## Any questions on the summary paper?

A summary paper was previously circulated to all members. No questions were raised.

OD noted that the summary paper did not include two ongoing BCS laboratory applications. GP confirmed both applications were progressing.

## Update on the Resource Framework Revision

DC provided an overview on the publication of the interim Resource Framework (RF) and the full ADRF revision due in 2026. He outlined the regulatory context following publication of the ADRF, RPS 317 and RPS 358, noting that these now apply in England and replace the ADQP. DC highlighted the shift to achieving End of Waste (EoW) at the point of dispatch, with storage of non-waste material permitted only where supply records or contracts are in place.

DC summarised the clarifications to RPS 317 and RPS 358, emphasising operators' responsibilities when notifying the EA, the timelines for registration, and the evidence required for upgrading processes to meet new plastic limits. He also noted the implications for test reports, explaining that although the new 8% plastic threshold is now shown on laboratory reporting templates, results in excess of this reported limit will not automatically constitute a non-compliance where operators are correctly using RPS 317 during the exemption period.

DC provided an overview of the waste code changes introduced by the ADRF, including the removal of all "99" codes and the need for operators to review their accepted wastes carefully. He explained that the removal of household wood waste relates to EA concerns about treated timber entering the biowaste stream, and that operators should contact their local EA officer with any queries regarding their waste inputs.

DC also noted work underway to help the industry understand updates to the criteria for achieving EoW, including allowances for temporary non-waste storage under RPS 358 and the new requirement for digestate supplied to horticulture to go only to end users within the Responsible Sourcing Scheme. He confirmed that BCS will continue publishing guidance to support operators during this transition.

DC highlighted the growing regulatory focus on Nutrient Management Plans (NMPs), stressing that these will become increasingly relevant to demonstrating landbank suitability and ensuring appropriate deployment of digestate at AD sites.

AC queried the removal of household wood waste under EWC code 20 01 28, questioning why municipal wood would be excluded.

JH explained the concern relates to treated wood contaminants; changes are aligned with broader updates. DM highlighted that most domestic wood is chemically treated and not suitable for processing, while untreated wood, such as felled trees, falls under "parks and garden" EWC code 20 02 01. DC confirmed only untreated wood is permissible. Relevant waste code changes were shared by DC via the meetingchat function.

DC provided an overview of NMPs. AC noted that some of the forms and paperwork being used by the CBs still listed just the QP and had not been updated to include the necessary references to the RF.

GP stated that all CB documentation should have been updated by now, and that all required references to the RFs should be present.

DC added that webinar recordings covering all RF-related changes these changes are available. NRW and NIEA positions remain that the QP should continue to be used until further notice, with NRW close to adopting the RF with Wales-specific amendments.

DC added that discussions regarding revising PAS110 -and PAS100- were delayed until the Resource Framework publication and implementation was complete. BCS are now beginning early discussions with BSI regarding PAS updates, and are considering how to implement changes efficiently given external factors.

JC raised the topic of dried digestate as a potential new product, noting prior evidence and EA interest in including it in RF revisions. DM described current de-watering practices and limitations on further drying due to energy costs, while AC emphasised maintaining options which should remain available to operators to encourage innovation. DC noted that presenting robust data during consultations could allow discussions on viability.

University-led research projects, including UCL and Horizon 2020, are exploring concentrated digestate products, but PAS110 currently limits commercial application. GE highlighted a hub project aiming to consolidate digestate-derived product research to support regulator engagement.

JC and AC emphasised the need for additional products to manage increasing digestate volumes and decreasing landbank, citing international examples such as ammonia stripping in Germany. DM suggested a tiered standard approach (gold, silver, bronze) for digestate end uses, allowing different criteria depending on the application, while maintaining compliance for key parameters like PTEs.

DC also summarised progress on PAS110 revision planning. JC and AC raised longstanding concerns about dried digestate and ammonia stripping products. GE reassured attendees that Project 9 is gathering evidence across digestate processing innovations.

*Action 6: RH to clarify the scope, existing data, and contribution mechanism for the RH project addressing digestate-derived products, whether suggested post-processing products list is exhaustive/up to date.*

*Action 10: GE to contact DM about volunteering as a BCS operator on the steering committee for the RH project "Evaluating quantified and visually assessed physical contaminants in delivered biowastes and biowastes after pre-treatment, and improving their assessment and pre-treatment management"*

JC asked whether operators could suggest potential products without supplying full supporting data. GE advised that indicative suggestions were valuable.

## Feedback from the last Technical Advisory Committee

JC noted that much of the relevant material had already been discussed. He commented positively on the in-person TAC format and encouraged future consideration of in-person meetings.

## Policy Updates

DC summarised policy developments, particularly work on Simpler Recycling and projections of increased AD feedstock volumes. No questions were raised.

## Research Hub Updates

GE encouraged participation in the annual survey, reiterated the value of the Research Library, and updated attendees on:



### Project 7 – Risk Assessments

GE reported that this project aimed to inform the development of evidence-based EoW positions for compost and digestate, namely the CRF and ADRF. ‘Exposure scenarios’ were being developed for each hazard group identified through the gap analysis. These scenarios considered realistic, potentially high-risk pathways for human, animal, and environmental contamination. The work was due to be completed in January 2026, with the project report expected to support the Environment Agency’s revision of the RFs in 2026.

### Project 8 – Screening Size Impact on Digestate Quality

GE noted that a new Steering Group member had been appointed, bringing operator experience specific to the Scottish context. The Project Brief was being revised by the Hub in consultation with the Steering Group.

### Project 9 – EoW Case Information for Digestate-Derived Products

GE confirmed that the project was assessing the attributes of digestate-derived products and their potential viability within the UK market. The work aimed to generate evidence on the physical properties of digestate-derived products in time for the ADRF revision window.

GE reported that the project team had completed the literature and policy review covering the UK, EU, and USA, and were now identifying suitable non-waste comparators for the study.

### Projects Selected for 2025

#### 2502 – Evaluating Physical Contaminants in Delivered Biowastes and Post-Treatment Biowastes

GE explained that this project would consider both composting and AD processes. It would focus on local authority kerbside food waste collections, aiming to quantify contaminant levels and assess the impact of these contaminants on Scheme participants.

#### 2505 – Review of Residual Biogas Potential Test Duration and the 5-Day Gas Evolution Quality Criterion

GE stated that this project built on the earlier Hub Project 3, but would draw on much larger anonymised datasets generated through RBP testing. The study would examine whether the 28-day test result could be reliably predicted at 10 days.

Operators shared experiences of contamination levels, with several noting that typical contamination was closer to 3% than the 5% referenced in some contracts.

*Action 11: Operators to send GE suggestions for Hub comms improvements.*

### Issues Raised with the BCS Operators' Representative

JC had no further items to raise. Comments earlier regarding APHA communications reflected his personal experience.

### Other Issues Raised by Operators

AC queried whether a Scottish laboratory was misrepresenting itself as approved.

*Action 19: BCS and AC to verify no labs are incorrectly claiming approval, with AC forwarding evidence to GP.*

GP provided a detailed update on lab performance, customer service improvements at Eurofins, contact details for escalation, and forthcoming changes to T&Cs.

OD confirmed that depot drop-off options continue to be effective.

## AOB

### **JH to return to EoW (End of Waste) webinar discussions with CIWM (Charter Institute of Waste Management) after the publication of the RFs (Resource Frameworks)**

JH confirmed that the CIWM EoW webinar action was closed as there was limited interest in this topic, given that recent webinars held by CCS and BCS delivered information about the new RF adequately.

### **BCS to further consider holding separate webinar for manure-based digestate producers / on-farm AD producers, in conjunction with CIWM after publication of the RFs**

DC will circulate the manure-based digestate webinar to DM and EG. Action closed.

### **GE to consult with REA (Renewable Energy Association) regarding sharing RH (Research Hub) publications on Hub Research Library**

GE will incorporate the earlier REA-related action 1 into a wider review of Hub promotion and communications.

### **Operators to contact GE if interested in participating in university presentation/webinar for 2025**

JC remains interested in participating in university webinars.

*Action 17: Operators to contact GE if interested in 2026 university webinar participation.*

AC asked if Cranfield and or Rothamsted had been approached for Scheme approved testing services.

OD will verify whether Rothamsted or Cranfield have been approached regarding testing options.

*Action 16: BCS to check Rothamsted/Cranfield testing options.*

DM and AC raised interests relating to dry AD and blogpost contributions.

*Action 18: BCS to speak with DM regarding dry AD and blogpost contribution.*

## Actions

1. GE to continue overall Research Hub (RH) promotion and comms (e.g., newsletter or pamphlet covering the work of the Hub, with a focus on outcomes of projects, to inform operators what they've funded to date).
2. GE to feedback outstanding annual feedback survey information (data from both the 2024 and 2025 surveys).
3. BCS to consider manure-based digestate -and other potential RF changes such as digestate drying, pelletisation, expansion of digestate to horticulture, and any further changes to point of dispatch requirements- in relation to Scheme operations and future PAS 110 review plans in 2026.
4. BCS to reconsider holding an in-person Forum in 2026.



5. BCS to monitor progress on regulatory discussions around manure-based and non-waste AD to identify if there is an opportunity for non-waste digestate certification.
6. RH to clarify the scope, existing data, and contribution mechanism for the RH project addressing digestate-derived products, whether suggested post-processing products list is exhaustive/up to date.
7. OD to ask the Test Method Working Group for reason as to why separate test methods/limits for compostable plastics are not being considered at this time.
8. AC, JH, and GE to jointly explore a Research Hub proposal on the suitability of compostable plastics or biobags in AD, including the appropriate process for facilitating incubation and workshopping of the project idea.
9. GE to investigate Hub process for helping facilitate 'incubation'/'workshopping' of this compostable plastic/biobag project idea.
10. GE to contact DM about volunteering as a BCS operator on the steering committee for the RH project *"Evaluating quantified and visually assessed physical contaminants in delivered biowastes and biowastes after pre-treatment, and improving their assessment and pre-treatment management"*
11. Operators to send GE any suggestions for improvements to Hub comms or new comms ideas.
12. BCS to follow up on ABP pathogen testing reporting issues with the approved labs.
13. BCS to investigate the application renewal forms with the to check if they need to be updated to include the option for certification to the ADRF.
14. BCS to feedback experiences regarding lab communications and customer service issues at next Lab Quarterly meeting relating to miscommunication of SciTech closure while still accepting samples.
15. RH to consider producing webinar to demonstrate the deliverables of Project 7: Risk Assessment updates to scheme participants.
16. BCS to check if Rothamstead or Cranfield have been asked about testing compost or AD, and to consider contacting them when next prospecting if not.
17. Operators to contact GE if interested in participating in university presentation/webinar for 2026
18. BCS to speak with DM regarding dry AD and blogpost contribution for the BCS.
19. BCS and AC to verify that no Labs are incorrectly claiming BCS approval and for AC to forward the LinkedIn post concerning the Scottish Lab's potential misrepresentation to GP.