

BCS Factsheet: Plastics contamination reporting and limits

Understanding the changes to plastic reporting in response to the Resource Framework and Regulatory Position Statement 317

PAS110, the AD Quality Protocol, and the AD Resource Framework

Introduction to the Resource Framework

The Anaerobic Digestate Resource Framework (ADRF) is the new End-of-Waste framework for digestate in England, replacing the AD Quality Protocol (ADQP). Like the ADQP, the ADRF aims to standardise digestate quality while ensuring environmental safety. However, it introduces stricter rules on physical contaminants, with the addition of plastic specific limits not found in BSI PAS 110:2014 (PAS 110).

Plastics Limits and notification for exemption

The ADRF brings new plastic limits to digestate produced in England under the BCS. Specifically, a threshold of 8% of the total physical contaminant (PC) limit already in PAS 110 as shown below. *NOTE these plastic specific limits are identical to what already exists in Scotland.*

Total nitrogen (N)	kg/t	Less than 1	1 to 1.9	2 to 2.9	3 to 3.9	4 to 4.9	5 to 5.9	6 to 6.9	7 to 7.9	8 to 8.9	9 or more
Total stones	kg/t	3.2	6.4	9.6	12.8	16	19.2	22.4	25.6	28.8	32
Total PC (excluding stones)	kg/t	0.04	0.07	0.11	0.14	0.18	0.22	0.25	0.29	0.32	0.36
Total Plastics	Kg/t	0.003	0.006	0.009	0.011	0.014	0.018	0.021	0.023	0.026	0.029

Producers in England who are unable to meet the new plastic limit may notify the Environment Agency (EA) within six months of the ADRF’s publication date of the 20th October 2025 that their intention is to use the RPS 317 plastic exemption [here](#). The Email notifying of RPS 317 usage must be sent to the EA (ResourcesFrameworks@environment-agency.gov.uk) no later than the 20th of April, 2026.

Participant using the RPS 317 exemption have until October 2027 to work towards compliance with the new limit. During this period, processes that notify the EA that they are using the RPS 317 exemption will not be assessed against the plastic limits i.e., only the total stones and total PCs limits (shown in the above table) will apply.

Furthermore, operators must also submit evidence by email to the EA of plant and process upgrades aimed at achieving the new limit send evidence of orders for new infrastructure and plan to upgrade site processes within 6 months of registering use of this RPS using the subject line containing “ RPS 317” to the address: resourcesframeworks@environment-agency.gov.uk. Records must be kept for two years to demonstrate compliance. Examples of evidence could include invoices or work orders for new

equipment, or process upgrade plans to meet the reduce limit. The EA will investigate each RPS upgrade email and will notify you and REAL if they feel insufficient evidence has been provided.

Any authorised exemption will remain valid until August 2027, after which full compliance with the reduced plastic limit will be required.

BCS test results after 20th October 2025

For all BCS samples received by BCS Approved Laboratories after the 20th October 2025, test reports will display the plastic contamination content and a pass/fail based on the digestate sample's relevant nitrogen (N) based plastic limit, regardless of which nation the material is produced in. However, exceeding the relevant ADRF plastic limit alone won't automatically mean end of waste has not been achieved. Specifically, at this current time the plastic limit does not apply for Wales and Northern Ireland processes producing digestate for these nations only and, RPS 317 exempt English processes i.e., in these instances the result serves as an indication that the sample would fail if tested to ADRF limits.

Why has REAL taken this decision on reporting?

The reason for taking this decision on reporting it to protect the scheme as a whole and individual operators from non-conforming digestate accidentally being sent to market.

My report is showing failure for plastic and this is incorrect

If you are operating an RPS 317 exempt process for end-of-waste status in England, or a process with end-of-waste status in Northern Ireland or Wales, and receive a failure for plastic which you believe is not applicable, you may need a revised report for sending to a third party contractor or customer.

If the suspected incorrect failure concerns an RPS 317 exempt process, please contact oliver@realschemes.org.uk and georgia@realschemes.org.uk with evidence of your RPS registration email sent to the EA, so that a revised report can be arranged.

If the suspected incorrect failure concerns a process with end-of-waste status in Northern Ireland or Wales, please contact oliver@realschemes.org.uk and georgia@realschemes.org.uk. REAL will instruct the relevant Approved Laboratory as needed.

If incorrect information is sent or missing, this will delay the issuing of revised reports.

For more detailed information about the ADRF implementation and requirements, please contact your Certification Body or refer to the official ADRF documentation on the UK Government website [here](#).