



The publication date for the Interim Resource Frameworks has been confirmed by the EA as **Monday 4th August**. This Newsletter contains important updates on what the Schemes can expect from the RFs and how to prepare for the new requirements.

ADRF Webinar

At **midday on Thursday 24th July**, the BCS will be holding a webinar on the Interim AD Resource Framework outlining the following key areas:

- The key changes from the AD Quality Protocol to the Interim AD Resource Framework
- How the BCS will be implementing the Interim Framework
- The latest developments of the Research Hub Risk Assessment project, which will inform the final review of the Resource Framework

Summary of changes: ADQP to ADRF

The list of designated markets in the ADQP has been removed. Should the digestate comply with the ADRF, PAS 110 and the BCS Scheme Rules, it can be supplied to wherever the demand is

Changes in the list of acceptable EWCs for inputs

Certification/ compliance with PAS 110 and ADRF is now achieved at the point of dispatch

Operators will need to confirm end-user has a nutrient management plan within their supply documentation

Operators will need to notify the Environment Agency of their intent to utilise the plastic limit RPS in the first 6 months from the date of publication

New market opened in Growing Media for digestate. Must be supplied to a member of the Responsible Sourcing Scheme (<https://www.responsiblesourcing.org.uk/>)

EA's Regulatory Position Statement.

The Environment Agency will publish a Regulatory Position Statement (RPS 317) on the **4th August 2025**. This RPS allows certified PAS 110 digestate to be stored and used in compliance with the RF while still

Key Dates

Thursday 24th July: BCS webinar on ADRF

Monday 4th August: Interim Resource Frameworks and Regulatory Position Statement (RPS) publication date

Wednesday 4th February: Deadline for applications to use the plastic limits RPS exemption

Autumn 2025: Finalisation of Research Hub Risk Assessment project

Summer 2026: Review of the Interim Resource Frameworks begins

August 2027: expiry of RPS 2 year exemption period for the newly introduced plastic limit outlines in the CRF and ADRF

Checklist of pre-publication actions

- ☐ Add checking for presence of end-user Nutrient Management Plan to SOP
- ☐ Check Waste Code changes
- ☐ Decide whether to utilise the plastic limit RPS
- ☐ If using the RPS, Email the EA CC'ing in BCS notifying of intent to use RPS for your process(es)

using the plastic limit stated in PAS100/PAS110 - rather than the reduced plastic limit in the RF; all other RF requirements must be met.

RPS 317 offers a temporary exemption on the reduce plastic limit, giving operators time to upgrade infrastructure and meet the new plastic content limits in full.

Key actions for scheme participants

You must notify the Environment Agency (CC'ing in BCS) of your intent to operate under RPS 317 within 6 calendar months of the RF publication date; by 4th February 2026.

- Email: ResourcesFrameworks@environment-agency.gov.uk
- Subject line: Biowaste RF RPS notification

You must be certified to PAS 110 and meet all requirements of the new Resource Frameworks except for the plastics limit, RPS exemption only covers the reduced plastic limit. All other limits, scheme documents, and regulatory requirements still apply.

You must provide evidence of upgrade plans to work towards meeting the reduced limits once the RPS exemption period ends in August 2027:

Within 6 months of your RPS notification, you must send proof of infrastructure orders and a plan to upgrade site processes to:

- Resources.Framework@environment-agency.gov.uk
- Subject line: Biowaste RF RPS upgrade plan

You must keep records for 2 years showing how you complied with the RPS. These must be made available to the Environment Agency on request.

You must meet the Resource Framework plastics limits in full by **4th August 2027**.

Research Hub RF-related project

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

The RF Task and Finish Group, convened by the EA, decided that risk assessments for compost and digestate must be conducted to identify hazards that may not be adequately controlled under the QPs. The Research Hub commissioned the current research project to provide the requisite Risk Assessments to feed into development of the RFs. Following the publication of the interim RFs on 4 August, the Risk Assessment project will conclude in Autumn 2025 with a project report (including Risk Matrix) which may be used by the EA during their review of the Interim RFs in 2026.

The contract to complete the Risk Assessments was awarded to WSP, who are working with the Steering Group (comprising an EA representative and an industry representative). The project work has been split into the following 3 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 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) is currently designing '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 use. Hazard and exposure assessment form part of this stage of the project: critical thresholds and parameters for priority hazards will be defined, alongside estimates of human and environmental exposure. Hazard and exposure assessments will be combined to characterise risk for each scenario.

3. Project Finalisation

The findings of the completed Risk Assessments will be synthesised into a risk matrix alongside reporting on key conclusions, areas of remaining uncertainty, and recommendations for acceptable use/ risk management. The final project report will be made available to the EA, to inform the revision of the Interim RFs in 2026.
