

Biofertiliser Certification Scheme Operators' Forum

Minutes of the meeting on Wednesday 21st May 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

Jo Chapman (JC) - Operators' Representative

Tom Brown (TB) - Operators' Representative

Rebecca Taylor (RT) - KVI Management Services

Angela Cronje (AC) - Scott Bros Environment

Acronyms

BCS – Biofertiliser Certification Scheme.

REAL – Renewable Energy Assurance Ltd.

TMWG – Test Method Working Group.

PC&S – Physical Contaminants and Stones.

EoW – End of Waste.

RFs – Resource Frameworks.

EA – Environment Agency.

ADRF – Anaerobic Digestion Resource Framework.

T&FG – Task and Finish Group.

RBP – Residual Biogas Potential.

PAS – Publicly Available Specification

REA – Renewable Energy Association.

CBs – Certification Bodies.

RAMS – Risk Assessment Method Statements.

PPE – Personal Protective Equipment.

AD – Anaerobic Digestion.

QP – Quality Protocol.

MMG – Megan Muller-Girard, former Research Hub Manager

NRW – Natural Resources Wales

NIEA – Northern Ireland Environment Agency.

RPS – Regulatory Position Statement.

PTE – Potentially Toxic Elements.

1. Welcome

REAL welcomed new BCS forum attendees to the meeting.

JC raised that they would like to discuss laboratory services later in the meeting under Any Other Business.

2. Previous Meeting Minutes

The minutes from the previous forum meeting were accepted without objection.

3. Updates on the BCS

OD conveyed that the issue of laboratories identifying disputed sharps in digestate which had come to light in the latter half of 2024, stemming from concerns about test methodology inconsistency. This matter was then passed on by the BCS to the newly formed REAL Test Method Working Group (TMWG). The TMWG's initial project would focus on the Physical Contaminants and Stones (PC&S) methods, with sharps as a key area for discussion. The group planned to convene in 2025, and OD affirmed that any operator wishing to share sharps results with BCS/TMWG was welcome to do so. JC subsequently raised the importance of considering risk, questioning whether the material would undergo manual handling (which was unlikely for digestate). AC clarified that this could apply to fibre.

JH confirmed that the action to return to End of Waste (EoW) webinar discussions with CIWM remained outstanding, awaiting the publication of the Resource Frameworks (RFs).

DC echoed JH, indicating that the action for REAL to further consider holding a separate webinar for manure-based digestate producers/on-farm AD producers, in conjunction with CIWM, was pending the Environment Agency's (EA) next draft, in light of chicken manure considerations. JC understood this would be addressed in a subsequent iteration of the RFs. DC elaborated that the EA was conducting an internal review of documentation, with the Anaerobic Digestion Resource Framework (ADRF) forming part of this review. It was currently unknown how or if this would alter waste codes. The outcome of the review was anticipated, hopefully at the next Task and Finish Group (T&FG) meeting, with relevant results to be disseminated to the BCS Forum.

AC reported that the action to send emails from Sci-Tech to GP for further investigation concerned under-reported E. coli compost test results. GP confirmed that Angela had forwarded the relevant email, but it was unclear whether the issue related only to the solid fraction and compost.

For Angela's site, samples had been sent directly to Sci-Tech for Residual Biogas Potential (RBP) pathogen testing and indirectly to Sci-Tech via NRM for PAS 110 pathogen testing (covering both solid and liquid samples). GP stated that Sci-Tech had advised it was not possible to distinguish between sample types when reviewing descriptions for customer notifications. As a precaution, Sci-Tech informed all customers so that no parties were missed.

As a result, NRM notified only the impacted AD operators for PAS analysis of fibre digestates, while Sci-Tech notified all AD operators for RBP non-PAS analysis of both fibre and liquid digestates, including operators who were not impacted. Sci-Tech later acknowledged that its communication could have been clearer, as it did not specify which fractions were affected. Sci-Tech has now ceased pathogen testing, which has resolved the issue. OD conveyed that it was confirmed that the current draft of acceptable waste inputs could not be shared until the EA had finalised the list. This was in response to the action for REAL to further consider sharing the final draft ADRF or list of acceptable waste inputs with forum attendees to seek feedback on any inputs which had been removed from the Quality Protocol (QP) and the implications of this, to share with the EA. It was affirmed that six weeks prior to publication, the full version of the RF and Regulatory Position Statement (RPS) would be provided to all scheme participants.

GE had taken up the action for MMG to further consider liaising with REA on sharing publications on their website in the Hub's Research Library, and it remained outstanding.

The action for operators to share any feedback with MMG on the Research Library usability and experience was transferred to GE, the new Research Hub manager.

GE confirmed they would provide an update on the action for operators to fill out the annual Research Hub participant survey at the next BCS Forum.

Regarding the action for MMG 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, AC suggested that when the Research Fee was raised, information could be shared with participants to illustrate what they had paid for.

Interested parties were asked to contact GE concerning the action for MMG to provide additional information about the university presentation/webinar idea and seek volunteers from operators for the 2025 webinars.

REAL held discussions with Certification Bodies (CBs) representatives concerning feedback from operators regarding discrepancies across CCS and BCS in terms of requirements for training around internal auditing, and the suggestion for REAL or REA to develop a training course on internal auditing for the schemes. There were no established standards for auditor training, only a requirement that records be maintained. This topic was slated for discussion at the next auditor roundtable and would be a consideration in reviews of PAS100 and PAS110.

AC confirmed that the action for operators to message her about experience with internal auditing for a composting site in the Northeast had been resolved.

AC and JC pointed out that the timing in the week was a factor in ensuring a robust sampling procedure (i.e., samples should not be collected on a Friday) for the action for operators to share information with OD about practical implications of having a third party visit the site to take an independent sample. Risk Assessment Method Statements (RAMS) and Personal Protective Equipment (PPE) requirements were open questions in the case of independent auditing. Other operators were urged to provide feedback on these issues. There was no further comment from BCS on this, but they were happy to receive feedback.

OD noted no responses had been received regarding the action for operators to email him if they were potentially interested in being a blog post contributor on the topic of 'How AD contributes to environmental protection', but they were always happy to hear from operators about relevant content. DC indicated that articles were being considered to create content for the industry. JC queried whether this was just AD, or more generally. DC clarified that any positive developments were welcome. JH suggested changing the title from 'environmental protection' to 'environmental benefit'.

OD indicated around a 10% response rate from the scheme had been received for the action for operators to complete the annual BCS participant satisfaction survey by the end of October.

OD stated the action for REAL to consider holding an ad hoc meeting for operators to discuss the RF changes (once published) and their implementation into scheme operation remained under consideration.

OD conveyed that the action for REAL to consider holding a face-to-face forum meeting in Manchester or Preston, and/or an ad hoc RF meeting, was being postponed for now. A survey had been circulated last year, but results were not coming through due to technical challenges. OD would be re-surveying.

4. Questions on the Summary Paper

No questions were raised on the summary paper.

5. Feedback from the Last Technical Advisory Committee

JC advised that investigative sampling for sharps had been discussed, with operators encouraged to liaise directly with the laboratories. CBs had urged operators to keep contact information up to date. Aardvark had been slower than other CBs but had since established an information portal, which was deemed useful for operators.

JC highlighted several observations made regarding recent updates to the RFs, which are scheduled for discussion at a future Forum meeting. Firstly, they noted that certain waste codes, which had previously been removed from the list, had since been reinstated. This update was broadly welcomed by operators, who viewed the reinstatement as a positive development.

Secondly, JC observed that the flow chart outlining when End-of-Waste (EoW) status is achieved had been removed from the updated documentation. They emphasised that further clarification on this point would be highly valued by operators, given the significance of clearly understanding when EoW status applies

AC indicated that this had also been discussed in the CBs Forum and carried significant implications for the sectors. JC noted that interim storage was acceptable, but there was a vulnerability regarding the cut-off point for usage and the movement of EoW status to point of dispatch rather than receiving a pass on all PAS100 tests. JC added that changing storage plans and requesting additional permits from the EA would impose a significant additional burden on operators. AC raised the question of how to address the reapplication of waste status in cases of delayed spreading/longer-term storage, which would be a pertinent question for operators. JH inquired about contingency plans for off-site storage (in case of flooding etc.) and whether the ability to use contingency storage would be impacted if the point of EoW status changed.

TB asked about the implications for Wales, Northern Ireland, and Scotland. JC indicated that it seemed probable the changes might eventually be applied across the UK, though there was some doubt about Scotland. DC conveyed that Natural Resources Wales (NRW) would be adopting the changes through an RPS mechanism. Regarding the Northern Ireland Environment Agency (NIEA), DC had heard from the EA that they had discussed this with their Northern Ireland counterparts. Annual meetings with regulators were approaching soon, and DC would put this question to them to confirm with operators hopefully by the end of July. DC did not believe there was any indication that Scotland would adopt the RFs.

JC conveyed several questions raised by scheme participants. Firstly, participants queried when material would once again become subject to waste controls. In response, DC clarified that this would apply if the material were stored for more than six months.

JC also asked where the responsibility lies for establishing whether the end-user has a nutrient management plan. They highlighted that the sudden implementation of the relevant requirements following the publication date had been a point of discussion, and that operators were keen to receive interim guidance to allow for adequate preparation.

Lastly, it was noted that mobile plant permits for the spreading of digestate as waste were due for revision. DC explained that, at present, consultation was limited to the standard rules, and that there had been little information received to date regarding bespoke permitting arrangements.

6. Policy Updates

DC informed attendees that an email had been circulated last month to register interest in a webinar on the changes to the ADRF. Anyone who did not receive it should notify DC. The webinar was still planned to be hosted between the receipt of ADRFs and publication (likely a period of around six weeks). The last T&FG meeting took place in October 2024 and was intended as the final T&FG meeting before publication. The delay stemmed from the need for EA legal to review the document and for EA publishing to ensure alignment with gov.uk formatting requirements. At least one more T&FG was still anticipated to review the framework one last time, with a couple of minor changes expected from the last draft but hopefully not too many more. They had been told that they should be able to share the RF following this T&FG meeting. DC had attended The REA's Organics Conference where an EA representative had given a June/July timeline for publication, but this was now likely to be delayed. OD and GP were collaborating with the EA on the implementation of ADRF and scheme readiness. Due to a recent ruling on categorising chicken manure as waste in Wye Valley, additional steps might be required before the publication of ADRFs.

AC asked whether this would necessitate a pasteurisation step for all AD plants. DC replied that current waste codes in the RF included a category for biodegradable animal waste, but it was unclear whether future waste codes would differentiate between cow slurry and chicken manure. TB asked whether there had been contact with AD operators currently accepting chicken litter. DC confirmed that BCS/REAL would query the EA. JC noted that an AD operator had contacted her to inquire about interim storage of chicken litter and whether this should be subject to permitting, in light of the ruling.

DC provided an overview of changes between QPs and RFs, noting that these might still evolve before the final iteration of RFs. They explained that the list of markets to which AD could be applied had been removed; if material complied with RF/PAS110, there was no reason to restrict the scope of markets. DC also clarified that digestate would attain EoW status at the point of dispatch. For intermediate storage, the draft ADRF specified this was only acceptable if there was an intended end use/end user, though it remained unclear if a third-party spreader or storer qualified as an end user. Clarification on this was a priority for REAL, and DC anticipated the final review of RFs would revisit this point. JC sought to know if there was a definition of "point of dispatch" in RFs, noting that the QP's flow chart currently covered this. JC questioned the burden on operators to provide evidence of intended use and dates of digestate application. Action: DC was to raise this in the T&FG meeting, with CCS and BCS perspectives on the matter to be gathered beforehand. AC observed that AD producers already had contractual relationships to ensure a robust flow of information regarding dispatch and the supply chain, and they expressed a desire for a diagram as it would be clearer.

Regarding the enhancement of digestate/other products, this was something AD operators wished to introduce but was not permissible in QPs. JC concurred, asking what had become of discussions about opening new markets for AD. DC suggested this could be scope for a Research Hub project, and stated that compliance with the RF/PAS110 would be stipulated through a certification body. A plastic limit would also be introduced as part of the physical contaminants limit, aligning with the current Scottish limit. This would be 8% of the PAS110 physical contaminant limit, to be phased in over two years. AC asked whether this pertained only to fossil-fuel-based plastics or if it included bio-based plastics, suggesting that laboratory testing might need to differentiate these materials. JC inquired whether plastic type had been included in the scope of the Test Method Working Group, and OD confirmed they would relay this question to TMWG.

DC added that from the RPS publication, operators would have six months to inform the EA they wished to utilise the RPS. This would enable operators to work towards lower contaminant limits for a two-year period. The Risk Assessment Research Hub project might also contribute evidence to the final iteration of new RFs, with the revision process would follow the publication of RFs. Notably, figures in the ADQP had been removed from ADRFs, and requirements for import and export had been removed. Digestate going to growing medium markets was now permissible for horticulture but would need to pass through an accredited member of the responsible sourcing scheme. Finally, regarding waste code changes, DC was not confident that these would not reverse and change again, so DC chose not to discuss them.

7. Research Hub Updates

GE began by outlining the Research Hub introduction and its project selection process. GE then announced that two projects had been selected from the 2024 proposal intake. These included an 'Appraisal of the impact on digestate quality with a final screening step, from the introduction of a smaller screen size,' and a project focused on 'End of waste case information for digestate derived products.' Finally, GE provided updates on ongoing projects.

8. Issues Raised with BCS Operators' Representative.

TB brought up that stability/inoculum testing had been a problem in Autumn 2024, leading to failed tests and operators having to submit duplicate samples. TB inquired whether this pointed to an issue with the laboratories. AC observed that they had found very stable digestates did not react to inoculum. JC had been utilising her own inoculum and had experienced fewer non-response tests.

JC shared that an operator had encountered a failure on mercury testing when the Potentially Toxic Elements (PTE) machine at the laboratory was offline. The sample, sent to another accredited laboratory, had also failed on mercury testing. This had been formally raised with the laboratories as an anomaly attributed to inoperable instrumentation. The operator expressed dissatisfaction with the laboratory. The BCS Forum had previously discussed appeal procedures for laboratories. JC believed that oversight of in-house laboratory investigations in such cases would be highly beneficial. RT added that they would follow up with NRM for their internal report. RT remarked that tracking trends in PAS110 results over time would be very helpful.

A revalidation process was underway for RT's operation. Costs had been high and throughput had been affected. RT asked GP to urge the laboratories to improve customer service. RT expressed hope that there would be more laboratories in the future offering better customer service. AC recounted that this had occurred with several operators they worked with.

AC had furnished laboratories with historical data indicating mercury levels had been undetectable for years. AC later clarified that her client had issues with Cadmium and Nickel levels, and they subsequently received an email from NRM stating the PTE equipment was not functioning. RT, AC, and JC all noted that operators had been impacted by anomalous test failures. RT requested that GP press the laboratories for internal investigation on anomalous results, given that multiple operators had experienced similar outcomes. JC asked GP to keep affected operators informed of the laboratory's response.

9. AOBs

GP stated that they were aiming to increase the number of laboratories on BCS as a whole, and that the labs would be improving communications and documentation of customer service issues as well as test result queries.

AC asked whether there was a process by which operators could go through REAL to send 'back-up' samples to the laboratories, rather than undergoing the entire revalidation process. It was agreed that methods to enhance the robustness of the laboratory testing procedure would be an agenda item for the next meeting. JH suggested incorporating a standing agenda item covering laboratory issues. This would allow for the collation of information on laboratory complaints, which operators could then use when discussing test result issues with laboratories. OD, GP, and DC agreed to consider this suggestion.

Meeting ended: 13:53