

BCS Operators' Forum - Resource Framework

Thursday 24th July 2025

Attendees

Oliver Dunn (OD) – REAL BCS
Grace Egan (GE) – REAL Research Hub
Duncan Craig (DC) – REAL BCS
Georgia Phetmanh (GP) – REAL BCS
Sally Mealor (SM)
Donelle Fitzpatrick (DF)
Russell Bryant (RB)
Johan Lourens (JL)
Darren Smith (DS)
Phil Kennerley (PK)
Jo Fitzpatrick (JF)
Lestyn Gordon (IG)

Elisa Gioacchini (EG)
Jo Chapman (JC) – Operators' Representative
Rebecca Taylor (RT)
Kathryn Dunham (KD)
Tom Brown (TB) – Operators' Representative
Mark Christensen (MC)
Georgie Menzies (GM)
Adam Metcalfe (AM)
Angela Cronje (AC)
Mark Evans (ME)
Alison Dring (AD)
Scott Bartlett (SB)

Welcome

DC welcomed attendees to the ad-hoc July BCS Operators' Forum, focused on the AD Resource Framework. The forum began with introductions and a brief update on the upcoming REA-REAL joint webinar with the Environment Agency (EA), to be held in early August.

Background to the revision of the AD Resource Framework (ADRF)

DC explained that revision work on the ADRF began in late 2022, with BCS contributing extensively to the EA-led Task & Finish Group. The purpose of the revision is to align the resource framework with current best practice and emerging evidence, most notably by introducing a tighter plastic contamination threshold. DC noted that the delay in updating the ADQP, along with the findings of the Research Hub's ongoing risk assessment project, had also prompted the need for an interim revision.

The interim Resource Framework is scheduled for publication on 4th August 2025, with compliance required from the date of publication. However, it will be accompanied by a Regulatory Position Statement (RPS), which will allow operators to continue adhering to the current ADQP plastic limits for up to two years, provided they can demonstrate a transition towards meeting the new RF limit. The BCS is in active correspondence with the Environment Agency to help ensure that this transition is managed as smoothly as possible. DC emphasised that this remains an interim framework, with a full review expected to take place next year. The inclusion of new evidence-based requirements at this stage reflects the fact that the RH project has not yet concluded.

NOTE: The publication date for the ADRF was pushed back and BCS is currently awaiting further information from the Environment Agency on the updated timelines.

The Role of the Ongoing Risk Assessment Project

GE provided an update on the Research Hub's ongoing Risk Assessment Project, which will inform a second revision of the ADRF scheduled for 2026. The project was commissioned following recommendations from the Task and Finish Group, which identified the need for a robust reassessment of potential hazards in source-segregated compost and digestate.

The project began with a rapid literature review and gap analysis, jointly led by industry and Environment Agency representatives. This phase aimed to identify known hazards, assess emerging concerns, and determine whether significant changes in feedstocks, processes, or regulatory standards had occurred since the last formal risk assessment.

The project has now entered its second phase, in which the team is developing exposure scenarios to evaluate whether each shortlisted hazard poses a credible risk to human health, animals, or the environment. Under the project's strict criteria, a hazard will only be flagged as a concern if it is inherently harmful and there is a viable pathway of exposure within the composting or AD process. This approach is designed to ensure rigour and avoid unnecessary scope expansion.

The final outputs, including a detailed risk matrix, are expected in late 2025 and will be made available to the Environment Agency to support future regulatory decisions

JC queried whether the Risk Assessment Project was intended to justify or provide evidence for current activities already in scope under the ADQP (or equivalent), or whether it was aimed at providing evidence for additional products previously proposed by Operators.

In response, GE clarified that the gap analysis and hazard shortlisting phase had taken into account the removal of designated end markets, as well as the introduction of new feedstocks over time. As such, the project is intended to reflect recent developments in market practice.

AC noted that while the project scope included an undefined "end point," it explicitly covered only one additional process step — the separation of digestate. Any subsequent downstream processes beyond that point were not within the project's remit.

DC confirmed that the slides presented during the forum would be circulated to attendees following the meeting and agreed to add Grace's contact details to the slide deck.

Summary of Key Changes in the ADRF

Input Materials and Waste Codes

DC began by summarising the planned changes to waste codes within the new interim ADRF. The majority of amendments involve the removal of 99-series codes. DC also noted that, while some waste code descriptions have been updated, these changes were not listed in the slides. Operators were advised to review the waste codes upon publication to check for any amendments to descriptions, although DC believed these were likely to be minor.

Removal of Market Sectors and Visual Aids

DC further explained that some elements previously included in the ADQP are not present in the ADRF due to the formatting restrictions of GOV.UK publications. This includes the omission of Figures 1 and 2, as well as references to the European Economic Area (EEA) and the import/export of materials.

DC confirmed that in Section 2.2.2., reference to crop-fed AD has been removed. However, this does not imply that such feedstocks are now prohibited; rather, they are no longer explicitly referenced. Similarly, references to "designated markets" have been removed from the document.

DC added that another addition in the ADRF is a requirement for operators to now work with a BCS-appointed Certification Body that is either accredited by, or actively working towards ISO 17065 accreditation by, UKAS.

Plastic Limit Reduction

DC highlighted the new plastic contamination limits introduced in the ADRF. These are set at 8% of the existing PAS 110 threshold. However, a Regulatory Position Statement (RPS) will be published alongside the ADRF to allow operators to continue using the current ADQP total physical contaminant limit for up to two years, provided they demonstrate a transition towards compliance with the new threshold.

Nutrient Management Plans (NMPs)

On the subject of nutrient management, DC referred to Section 5.3 of the ADRF, which requires that, when digestate is supplied to agricultural end use, the end-user must hold a valid Nutrient Management Plan (NMP) covering the material in question. From the operator's perspective, it is sufficient to verify that such a plan exists. All enforcement responsibility for this requirement will lie with the end-user, not the producer.

End-of-Waste (EoW) and Storage

DC reiterated that the point of dispatch is now considered the point at which material loses its waste status. For this to apply, the material must be: 'produced only from source-segregated input materials, as specified in Section 2 (The RF equivalent of with Appendix B);

- Be stored in accordance with PAS 110 requirements;
- Undergo no further treatment after dispatch;
- Meet any additional specifications required by the customer; and
- Be accompanied by a clear and certain end-use.'

Waste controls remain in place until the material is dispatched, meaning that all material held between production and dispatch must be stored on appropriately permitted land.

DC acknowledged that delays in the review and issuing of new environmental permits had been discussed extensively elsewhere.

JC raised a question about the definition of "dispatch" in cases where digestate is transported to a store under the control of the end-user. JC queried whether contractual control of the store by the end-user would be sufficient. DC responded that their understanding was that this requirement referred to ownership or a formal contract with the end-user but agreed to confirm this point.

JC then asked whether storage at a third-party or operator-owned facility would qualify. DC confirmed that, based on current understanding, it would not. DC added that discussions scheduled for the following week would explore whether the definition of "end-user" could be broadened to "customer," which might provide additional flexibility for third-party contractors to sign off on the material. DC agreed to update attendees once those discussions had taken place.

DC also explained that the new ADRF includes a provision whereby material may lose its non-waste status if it is applied in excess of crop or soil requirements. This requirement is intended to reinforce the necessity of valid NMPs. Again, responsibility would fall on the end-user.

On market access, DC noted that the ADQP restricts digestate use solely to agricultural, land restoration, or forestry markets. Under the new ADRF, digestate may be supplied for use in horticulture (including as a growing medium or for soft landscaping) provided it is distributed through a member of the Responsible Sourcing Scheme (RSS) scheme. While this opens all digestate streams to horticultural use, it is anticipated that fibre fractions will be the most commonly used.

In summary, DC reiterated several headline changes:

- There are no longer designated markets within the RF.
- End-of-waste now occurs at the point of dispatch.
- NMPs are mandatory for all agricultural end-uses.
- The RPS allows for a two-year transitional period for plastic contamination limits.

Operators will be able to notify the Environment Agency of their intention to use the RPS from 4th August onwards. DC provided a brief walkthrough of the RPS notification process.

Finally, DC shared contact details for the Environment Agency and encouraged operators to reach out with any concerns. Where possible, operators were advised to make contact with their local EA officers to ensure clarity around their specific processes and any challenges with compliance, particularly with respect to storage arrangements.

Scheme integration and implementation of the ADRF

OD provided an overview of the integration work being undertaken across the Scheme in preparation for the 4th of August publication of the ADRF.

A revised version 6.1 of the BCS Scheme Rules has been produced, incorporating only the minimum changes necessary to align with the new RF. No further amendments have been made at this stage. These updated rules will be published on 4th August 2025, replacing the current version 6.0.

NOTE: Since the Forum was held in July, the publication date of the RF was changed, postponing the publication date

OD noted that BCS may need to produce a new set of conformity marks in the event that the devolved environmental regulators - Natural Resources Wales (NRW) and the Northern Ireland Environment Agency (NIEA) - publish end-of-waste positions that diverge from the ADRF, in contrast to their previous alignment with the ADQP.

A parallel issue was raised in previous discussions with compost producers participating in the Compost Certification Scheme, who expressed concern about using up existing stock of product packaging that displays the current conformity mark referencing the ADQP. A potential transition period specifically for the use of old conformity marks was discussed, with the aim of reducing waste (particularly plastic bags). OD advised that, although this issue is expected to be far less common among AD operators, BCS would be open to considering a similar transition arrangement for operators if sufficient need is demonstrated.

OD informed attendees that the Scheme-appointed Certification Bodies (CBs) are currently reviewing the audit checklists to ensure alignment with the ADRF. This review process is ongoing throughout the week, with revised versions scheduled for integration into CB procedures the following week, in readiness for use from 4th August onwards.

OD explained that minor amendments are being made across Scheme guidance documents to reflect the replacement of the ADQP with the ADRF. No major structural changes are anticipated, except for one document - Guidance on Assessing PAS 110 Test Results Against SEPA Plastic Limits. This guidance, which currently supports Scottish AD operators, is being updated substantially. AD operators in

Scotland are subject to lower plastic thresholds that are not currently reflected in standard lab reports. OD concluded with an update about ongoing work with the database developer to introduce an RPS-tracking feature. All necessary website updates are also scheduled to go live on 4th August to avoid confusion prior to the publication date.

GP added that laboratory reporting templates will not immediately reflect the new RF plastic limits upon publication. New templates may be introduced at a later date. In the interim, operators relying on the RPS will continue to see test reports aligned with the existing ADQP limits. It will be the responsibility of operators to compare their plastic test results against the new RF thresholds, where applicable. Operators who have registered for use of the RPS will be able to rely on those limits temporarily. For those not registered under the RPS, there is a risk that a lab report showing a “pass” under ADQP limits may constitute a failure under the stricter RF limits. Operators will be responsible for comparing their results against the applicable standard. Updated guidance will be reissued to support this comparison.

GP also noted that BCS may, at a later date, issue revised analysis request forms using updated lab reporting templates aligned with the RF plastic limits. This could, conversely, result in failed reports for operators using the RPS exemption. No final decision has been made on this change, but operators were informed in advance to ensure they are prepared for this eventuality. Further discussion is expected at the October Forum.

No further comments or questions were raised on this topic.

Webinar and engagement plans

DC confirmed that a joint webinar will be held with the REA in early August. This will include an EA representative who contributed to the CRF revision, offering producers a chance to engage directly.

DC also noted that NRW may confirm CRF adoption or adaptation shortly, while NIEA has yet to respond. SEPA will not adopt the CRF.

AOBs

AC requested that the Environment Agency provide a clear and standardised definition of the “point of dispatch,” noting that AD plant configurations vary significantly, and ambiguity could result in confusion or misapplication of the RF. DC agreed to raise this point with the EA.

TB voiced agreement with AC’s comments and asked whether the RF would allow for the domestic use of digestate, for instance via sale to garden centres. DC clarified that supply to the horticultural sector is now permitted via RSS members; however, this may not extend to all individual garden centres. In theory, such use is allowed, but it remains subject to channel restrictions.

JC asked whether the EA had provided any guidance on how off-site interim storage facilities would be treated under the RF, particularly where the “dispatch to end-user” criteria could require such storage to hold a permit. DC responded that no such clarification had yet been provided, and that this remained one of BCS’s top priorities. Given the timelines involved, DC noted that the standard permit application process may not be sufficient to meet such a tight deadline, and some form of expedited route may be necessary.

JC then raised a related point regarding material that is PAS 110-compliant but has not yet achieved end-of-waste status under the RF. In such cases, JC asked what documentation should accompany the material in transit, given that current paperwork assumes PAS 110 implies non-waste status. DC

acknowledged the complexity of this issue and thanked JC for raising it, stating that the more clarity and information BCS can provide, the better for all parties involved.

DC informed everyone at the end of the meeting that a joint webinar will be held with the EA in early August. This will include an EA representative who contributed to the RF revision, offering operators a chance to engage directly. DC also noted that NRW may confirm RF adoption shortly, while NIEA has yet to respond, and that SEPA will not adopt the RF.