

## Biofertiliser Certification Scheme Newsletter July 2024



---

### BCS Operators Forum and TAC

BCS held its biannual Operators' Forum in May. The BCS Forum took place on 22nd May and the TAC meeting on 5th June.

The highly attended forum allowed AD operators to raise key issues before the June Technical Advisory Committee (TAC) meeting. The Operators' Forum covered a wide range of topics which produced a significant quantity of content to be discussed at the TAC.

A key topic of the forum was the analysis of sharps in digestate and the criteria used for the test. Operators requested clarification on the criterion and asked whether BCS could comment on the potential revision of the test method, incorporating feedback that the definition is open to interpretation. During the forum, BCS informed that REAL is looking to develop test method revision procedures and at the TAC, BCS announced that a committee was being formed for this. BCS is currently in the process of finding a chairperson, and any

---

### Certification Body telephone numbers

#### OF&G

+44 (0)1939 291 800

#### NSF

+44 (0)1993 885 610

#### ACL

+44 (0)1984 624 989

### Approved Laboratory telephone numbers

#### NRM

+44 (0)1344 886338

#### Eurofins

+44 (0)1449 721 192  
(Chemistry) / +44 (0)1449 721  
637 (Microbiology)

---

### ADQP Revision

The ADQP is currently under review, with the intention to transition to the new Resources Framework. In February, the Task & Finish Group met to discuss proposals on several topics, particularly on the feasibility of introducing plastics limits as a specific component of physical contaminants in digestate.

BCS proposed introducing these sub-limits for plastics as a specific component of physical contaminants and introducing sub-limits for plastics that are 8% of the PAS 110 limits, as is currently in force in Scotland. Furthermore, BCS has proposed undertaking

further feedback or challenges from operators will be considered during the revision of the method in question.

Another request made from forum participants was for a potential webinar on the changes to the ADQP. This would help operators and potentially feedstock providers understand any significant changes introduced by the Interim Resource Framework.

Lastly, the issue of inopportune auditing was mentioned. There seems to be inconsistency in the auditing scheduling between Certification Bodies, causing some issues concerning short windows of time to address non-conformances. This issue was raised again at the TAC with all the Certification Bodies present. BCS agreed to address this inconsistency across the CBs soon.

---

### **New BCS Positions**

BCS has finalised new scheme positions on screening digestate, PAS 110 training, testing digestate produced by co-operatives or producers spreading on their own land for physical contaminants, and co-storage of liquid digestates. The new positions were finalised following consultation with the Certification Bodies and the Technical Advisory Committee (TAC). Some of the positions were discussed further with TAC members, including the regulators after this consultation phase.

The new positions will be published in the next version of the BCS Position on Technical Requirements document.

---

### **New Independent Laboratory Auditor**

A new independent laboratory auditor was appointed at the beginning of the year following an open tender last year.

Simon Blackhurst at SJB Quality Consulting (SJBQC) will audit the BCS (and CCS) approved laboratories to ensure conformity with their terms and conditions. This selection was made following a careful evaluation and interview process. SJBQC has started the 2024 audit round and will share audit findings in autumn.

CCS and BCS look forward to working with Simon and will continue engaging with him on any technical matters for discussion which arise outside the audits.

---

### **Labs reappointed under new T&Cs**

---

research and data collection on manure and slurry derived digestate. This will determine how best to address this type of digestate and the problems that have been raised in recent years.

Since this meeting, BCS has received the draft Interim Resources Framework from the Environment Agency (EA), who asked for comments from members of the Task & Finish Group. Our proposals have been included in the draft Resources Framework, however the transition period for implementing these limits is yet to be determined. BCS is also in discussion with the EA on the manure and slurry derived digestate work and how best to take it forward.

The next steps involve meeting again with the Task & Finish Group to discuss the comments made on the draft Interim Framework and determine which amendments should be included. It is likely this meeting will take place soon after the Election. Once the Interim Framework is finalised, it will be sent to the EA to go through their publishing process.

### **Other Policy updates**

---

The Government published a response to the Simpler Recycling consultation in May 2024. Following the feedback from the consultation, the Government has confirmed several key points:

- dry recycling can be co-mingled (put in one dry recycling bin)
- residual waste collections must occur on a minimum fortnightly basis.
- anaerobic Digestion is the preferred method of organic recycling.

The intention of these reforms is to provide much cleaner feedstock to

Following the 2023 audit round, both BCS approved laboratories were reappointed under a new set of terms and conditions for another year. The laboratories reappointed were NRM and Eurofins.

The decision to reappoint was taken by BCS after discussion with the Certification Bodies and recommendations from the previous auditor at the Open University.

The terms and conditions were revised in 2023 to introduce several changes. The most significant change relates to the introduction of requirements for non-UKAS accredited laboratories. Non-UKAS accredited laboratories can be approved under BCS, but their quality management systems will be more closely audited and there is a limit on the number of routine full suite samples they can test.

---

## BCS Research Hub

### **Powering research and development in the organics recycling sector.**

The Research Hub has published two project reports in 2024. These projects contribute to the Hub's growing catalogue of resources to support the organics schemes and sector. More details on these projects can be found below.

### **Carbon accounting for compost and digestate**

Carbon accounting and reporting continues to gain importance as governments, businesses, and consumers seek to understand the climate impacts of the activities they engage in and make efforts to reduce their emissions. The outcome of this project is a methodology to enable compost and digestate producers to conduct a carbon footprint assessment using established carbon accounting principles and frameworks.

### **Residual Biogas Potential Test improvements and alternatives**

This project aims to understand the cause of Residual Biogas Potential (RBP) test failures and invalid results, explore potential improvements to the method, and/or identify suitable alternatives. The outcome of the project is a report detailing this investigation and highlighting potential next steps to mitigate RBP testing issues.

We're also continuing to work on several additional projects:

### **Plastic contamination method assessment**

---

digestate operators to produce better quality certified digestate.

There has been a suggestion that there may be some level of adoption of EU Fertilising Product Regulations in the UK. As a result, BCS has been familiarising itself with these regulations and how they regulate the digestate, and wider organic fertiliser sectors in Europe. This knowledge will help us understand how any adoption may affect the BCS going forward.

## Plastics paper 2023

---

BCS (and CCS) published its 2023 plastic contamination paper at the end of last year. It provides a statistical analysis of certified digestate and compost test results. The paper revealed that the levels of plastic in certified digestate is significantly lower than the minimum quality requirements of PAS 110; 85% of digestate samples tested between 1st January 2022 and 31st July 2023 passed against the lower SEPA limit, which is 8% of current PAS 110 as of 1st December 2019, with 98.7% passing against the PAS 110 limit. You may find information on the SEPA Guidance [here](#).

BCS takes the opportunity to express its satisfaction with these results and looks forward to working with stakeholders to ensure minimum quality requirements continue to be met.

More information may be found in the paper [here](#).

## SEPA guidance for CBs

---

BCS has liaised with SEPA about permitting guidance for the Certification Bodies (CBs). SEPA produced a new guidance document for the CBs and auditors aimed at providing them with a better understanding of the different permits/licenses that producers in Scotland are issued.

This project aims to verify that the methods used to test for plastic contamination under PAS 100 and PAS 110 are fit-for-purpose and explore other potential methods.

The outcome of this project will be a report evaluating the current PAS-specified methods any potential areas for improvement. The report will also explore the potential use of an area-based method and investigate methods to test for microplastics in compost and digestate. The final report will be published in Summer 2024.

### **Plant Response Test interpretation and comparison**

This project aims to address challenges related to the Plant Response Test specified under PAS 100. REAL intend to work with CCS-approved labs and a project coordinator to deliver this project.

### **Risk Assessment to support QP revision**

This project intends to support the revision of the Compost Quality Protocol and AD Quality Protocol by conducting a risk assessment of the industry. We are working with the relevant stakeholders to take this work forward.

### **Organics Recycling Research Library**

We continue to keep the Research Library up to date with new information. The platform now contains more than 400 articles on composting and AD. To access this valuable repository of research on organics, please [visitwww.realresearchlibrary.org.uk](http://www.realresearchlibrary.org.uk).

To access these resources or learn more, please email [megan@realschemes.org.uk](mailto:megan@realschemes.org.uk).

---

### **Contact Us**



+44 (0)207 981 0875



[www.biofertiliser.org.uk](http://www.biofertiliser.org.uk)



[info@realschemes.org.uk](mailto:info@realschemes.org.uk)

The guidance will help the CBs with checking whether sites have the relevant authorisation in place to operate, especially given the differing permitting regimes across the UK. It was produced following discussions between BCS and the CBs, BCS and all environmental regulators at the joint REAL/regulators meeting last year.

### **First BCS Sampling Guidance Webinar**

BCS held its first sampling guidance webinar for operators earlier this year, with a focus on the PAS 110 liquid digestate sampling requirements and guidelines. The session provided an opportunity for operators to discuss relevant sampling approaches and addressed the following topics: Updates to scheme rules, REAL's guidance on sampling liquid digestate in accordance with PAS 110, sampling in practice, transport logistics, and developing SOPs. Operators were provided with an interactive platform, including Q&A, polls, and other feedback mechanisms. The webinar also assisted new operators and those who received non-conformances relating to sampling practice, with a view to helping them meet required standards.

The next webinar will be held in autumn this year.

Biofertiliser Certification Scheme is part of Renewable Energy Assurance Limited.  
Biofertiliser Certification Scheme, Brettenham House, 2-19 Lancaster Place, London WC2E 7EN  
Having trouble reading this? [View it in your browser](#). Not interested anymore? [Unsubscribe](#) instantly.  
You can read our privacy policy [here](#).