



# REA Member Briefing Note:

## AD Resource Framework

20<sup>th</sup> October 2025

This document highlights the key changes between the AD Quality Protocol and the AD Resource Framework. Both documents set out the end of waste criteria for digestate made from source segregated biodegradable waste, which includes compliance with PAS110. The ADRF is quite a different format and more streamlined than the ADQP. You can find the AD Resource Framework [\[here\]](#) to read the full details.

The key changes are:

- Waste code changes (see appendix) and updated references to acceptable standards for compostable packaging and non-packaging products (appendix - note 1)
- The point at which digestate reaches end of waste
- Tighter plastics limits
- Requirement for dispatch paperwork to include information on nutrient management plans
- Removal of market restriction, and an additional requirement if supplying to the growing media sector.

## Main changes

### 1. Waste codes

The Appendix B list from the ADQP which listed acceptable waste types for the production of quality digestate has been replaced by section 2 'Waste you can use'. There is a similar list of waste codes, descriptions and some restrictions. This briefing note's appendix lists the waste codes that have been added, those removed and those with changes to their description or restrictions.

The RF clarifies that 'use' means feeding a material into the biological treatment phases of the process.

### 2. End of Waste

Section 3 of the RF sets out the point at which digestate will no longer be considered waste.

*'Digestate products will have met the [end of waste test](#), and so not be considered waste anymore, if you can show all of the following:*

- *they have been produced using only the source-segregated biodegradable waste materials approved in section 2 of this resource framework*
- *you have stored and processed the waste correctly, in line with section 3.2 of this resource framework*



- they need no further treatment other than the methods described in BSIPAS 110 before their intended use
- they meet any extra specification requested by and agreed with your customer
- there is certainty of use for the material

If so, you will no longer have to follow [waste management controls](#) when you either:

- dispatch the products to the customer from your production site
- store the products at your production site or storage locations under your control

You must not store any portion of your product for more than 10 months. And you must have at least one of the following:

- contracts of supply or sales orders (or both) that cover the quantity of the same product in storage at any time
- sales history for the most recent 12 months that shows at least as much of the same product type was supplied for use'

This is a change from the ADQP which considered digestate as conforming at the end of the production process (and therefore no longer subject to waste management controls) regardless of whether it was stored on a permitted or unpermitted area. Under the RF if you store digestate outside of your permitted area, you will need to comply with the additional requirements it sets; the time limit for storage of any portion of your product and those relevant to your product quantity in those stores.

### 3. Limit for plastics

The ADQP references PAS110 which contains limits on the level of total physical contamination allowed in digestate. The ADRF introduces a tighter limit for plastic.

*The maximum allowed concentration of plastic in the digestate and other products derived from it is 8% of the 'total physical contaminants (excluding stones)' limits in Table 1 of BSI PAS 110'.*

This is set out in the table below:

Total Nitrogen	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
PAS110 Total stones	Kg/t	3.2	6.4	9.6	12.8	16	19.2	22.4	25.6	28.8	32
PAS110 Total physical contaminants (excluding stones)	Kg/t	0.04	0.07	0.11	0.14	0.18	0.22	0.25	0.29	0.32	0.36
New limit for Plastics	<b>Kg/t</b>	0.0032	0.0056	0.0088	0.0112	0.0144	0.0176	0.02	0.0232	0.0256	0.0288



If you cannot meet the tighter plastics limits, there is an associated Regulatory Position Statement 'Using PAS 100 or PAS 110 compliant material outside resource frameworks: **RPS 317**' which, if registered for, gives operators an additional 2 years (from the date the RF is published) to meet the tighter limits. You can see the RPS [\[here\]](#). You must notify the EA by 20<sup>th</sup> April 2026 that you are using RPS 317 and comply with all RF requirements other than the plastics limit. You must also:

- send to the EA, within 6 months of registering to use RPS 317, evidence of orders for new infrastructure and your plan to upgrade site processes, and
- keep records for 2 years to show you have complied with the RPS.

You cannot register to use this RPS after 20<sup>th</sup> April 2026.

#### **4. Nutrient management plans**

Section 5.3 of the ADRF sets requirements if you are supplying digestate to agriculture.

*your digestate supply documentation must tell the customers of the product that:*

- *they must have a nutrient management plan (NMP) before use*
- *they must apply digestate in line with the NMP, along with any other organic manures and manufactured fertilisers, at rates that do not exceed soil and crop need*
- *they are responsible for following their NMP – if they do not do this, the Environment Agency may take enforcement action*
- *where there is no soil and crop need for digestate, it is considered waste and they must follow [waste management controls](#)*

Compliance with this requirement is likely to need a modification to your contracts of supply and / or dispatch paperwork to ensure the above information is included. Appendix H of the ADQP set out good practice guidance that was often included in supply documentation. The AD RF does not refer to such guidance, so if revising supply documents it would be worth considering what up to date and relevant information to include (e.g. from the farming rules for water, codes of good agricultural practices, etc.)

#### **5. Market restrictions**

Unlike the ADQP, the ADRF does not designate market sectors to which product status digestate is allowed to be supplied. Consequently, its supply to a wider range of markets is possible. The ADRF does require that if you are supplying digestate as an ingredient for growing media for use in the horticultural sector, you only supply it to an accredited member of the [Responsible Sourcing Scheme](#). In addition, you must agree the digestate quality specification in writing with each member of the responsible sourcing scheme you supply. The quality specification must include (but is not limited to) physical contaminants and stability or maturity limits.

## REA checklist for operators

- ☐ Check your list of incoming materials against the list of waste codes to ensure they all comply.
- ☐ Check if you comply with the requirements on storage (especially any of your product is stored on an unpermitted area under your control), and if not consider alternative arrangements or permitting stores.
- ☐ Check if you comply with the tighter plastics limit, and if not register for RPS 317.
- ☐ If you supply digestate to agriculture, update your product supply / dispatch documentation to include the information on nutrient management plans.
- ☐ Update your supply / dispatch documentation to ensure the correct references to other information are included, i.e. codes of good agricultural practices and consider if reference to market sectors is required (not mandatory but these are no longer required to be recorded).
- ☐ If you supply to the growing media sector, ensure that you are supplying to an accredited member of the Responsible Sourcing Scheme and agree the digestate quality specification in writing.
- ☐ Update your Quality Management System to reference to the new Resource Framework, for example in your quality policy and external document register.
- ☐ Consider training for staff on new requirements and that this training is documented.

## Appendix - Waste codes changes

Waste codes **added**:

Waste code	Description	Restriction
02 07 05	Sludges from on-site effluent treatment	Only sludges from the production of alcoholic and non-alcoholic beverages (except coffee, tea and cocoa)
04 02 21	Wastes from unprocessed textile fibres	Only biodegradable material

Waste codes **removed**:

Waste code	Description	Restriction
02 02 99	Wastes not otherwise specified	Sludges from gelatine production and animal gut contents only
02 03 99	Wastes not otherwise specified	Restriction – Only: <ul style="list-style-type: none"> <li>– Sludge from production of edible fats and oils</li> <li>– Seasoning residues</li> <li>– Molasses residues</li> </ul>

		– Residues from production of potato, corn or rice starch
02 04 99	Other biodegradable wastes	
02 07 99	Wastes not otherwise specified	Only: – Malt husks, malt sprouts, malt dust – Spent grains – Hops – Yeast and yeast like residues – Sludges from the production process
03 01 01	Waste bark and cork	Untreated only
03 01 05	Sawdust, shavings, cuttings, wood, particle board and veneer other than those mentioned in 03 01 04	Untreated only
04 01 01	Wastes from leather industry	Fleshings may also be described as leather shavings. Restriction: Allowed only if hides and skins, or parts of them, originating from animals that did not show clinical signs of any disease communicable through that product to humans or animals.
19 05 99	Wastes not otherwise specified	Allowed only if: – liquor/leachate from a composting process that accepts only the waste input types allowed by this Quality Protocol; or – digestate from an aerobic digestion process that accepts only the waste input types allowed by this Quality Protocol.
20 01 38	Wood other than that mentioned in 20 01 37	Untreated wood only. Not allowed if any non-biodegradable coating or preserving substance present.

Waste codes with **changed descriptions or restrictions:**

Waste code	Description	New Restriction	Old Restriction
02 01 01	Sludges from washing and cleaning	Only vegetables, fruit and other crops	Food processing waste and food washing waste only
02 01 03	Plant tissue waste	Includes straw, other crop residues, riverine vegetation and spent growing media based on plant issues, such as compost derived from source-segregated biodegradable waste, peat and bark	Including husks, cereal dust, waste animal feeds, off-cuts from vegetables and fruit and other vegetation waste

02 01 06	Animal faeces, urine and manure	Includes animal faeces, urine, manure and spoiled fully biodegradable bedding	Animal faeces, urine and manure (including spoiled straw),effluent, collected separately and treated off site
02 01 07	Wastes from forestry	Only green waste and plant tissue	Plant tissue waste only
02 02 01	Sludges from washing and cleaning, peeling, centrifuging and separation including wash waters and sludges from secondary food processing or the cook chill sector	None	Process water and food washing waste only
02 02 02	Animal tissue waste	May include blood and gut contents	Including blood, animal flesh, fish processing waste, fish carcasses and poultry waste.
02 02 03	Materials unsuitable for consumption or processing	May include gut contents, shells and shellfish wastes. Includes sludges from gelatine production	None
02 02 04	Sludges from on-site effluent treatment	Only wastes from preparation and processing of meat, fish and other foods of animal origin	None
02 03 01	Sludges from washing, cleaning, peeling, centrifuging and separation	Only sludges from food processing	None
02 03 04	Materials unsuitable for consumption or processing	Only biodegradable waste. There must be no chemical additives or toxin residues present	None
02 03 05	Sludges from on-site effluent treatment or processing sludge from production of edible fats and oils, including seasoning residues	None	Changed description – previously was: Sludges from on-site effluent treatment
02 05 01	Materials unsuitable for consumption or processing	Includes raw milk. Must only be biodegradable waste.	Including solid and liquid dairy products, milk, food processing wastes, yoghurt, and whey.
02 05 02	Sludges from on-site effluent treatment	None	Biological sludge only

02 06 01	Materials unsuitable for consumption or processing	Only biodegradable waste	Including condemned food, food processing wastes, biscuits, chocolate, yeast, bread, bakery wastes
02 06 03	Sludges from on-site effluent treatment	None	Biological sludge only
02 07 01	Wastes from washing, cleaning and mechanical reduction of raw materials	Only biodegradable wastes from the processing of the raw materials used in the production of alcoholic and non-alcoholic beverages (except coffee, tea and cocoa)	Including brewing waste, food processing waste, fermentation waste
02 07 02	Wastes from spirit distillation	Only spent grains, hops and whisky filter sheets and cloths, yeast and yeast like residues, sludge from the distillation process, or malt husks, malt sprouts, yeasts and yeast-like residues	Only: – Spent grains, fruit and potato pulp – Sludge from distilleries
02 07 04	Materials unsuitable for consumption or processing	Only biodegradable wastes from processing raw materials used in producing alcoholic and non-alcoholic beverages (except coffee, tea and cocoa)	Including brewing waste, food processing waste, fermentation waste, beer, alcoholic drinks and fruit juice
15 01 01	Paper and cardboard packaging	Only if: - the material complies with the restriction for the waste type in Note 1 at the end of this section - there is no non-biodegradable coating or preserving substance present	Not allowed if any non-biodegradable coating or preserving substance present.
15 01 03	Wooden packaging	Only virgin timber	Untreated wood only
15 01 05	Composite packaging	Only if each component: - comes from the input types allowed by this resource framework - meets the restriction for the corresponding waste type in Note 1 at the end of this section	Only allowed if comprised of packaging material otherwise allowed by this Quality Protocol.
16 10 02	Aqueous liquid wastes other than those mentioned in 16 10 01	Includes: - milk and dairy waste milk from agricultural premises - untreated wash waters from cleaning fruit and vegetables on farm	Allowed only if digestate from an aerobic digestion process that accepts only the waste input types allowed by this Quality Protocol.

		<p>Digestate or liquor must come from an aerobic process that:</p> <ul style="list-style-type: none"> <li>- only accepts the waste input types allowed by this resource framework</li> <li>- meets the EU Regulation 1069/2009, its implementing EU Regulation 142/2011 (as amended) and The Animal By-Products (Enforcement) (England) Regulations 2013</li> </ul> <p>Liquor or leachate must come from a composting process that:</p> <ul style="list-style-type: none"> <li>- only accepts the waste input types allowed by this resource framework</li> <li>- meets the EU Regulation 1069/2009, its implementing EU Regulation 142/2011 (as amended) and The Animal By-Products (Enforcement) (England) Regulations 2013</li> </ul>	
19 02 10	Glycerol not designated as hazardous	Excludes 19 02 08	Previously: Combustible wastes other than those mentioned in 19 02 08 and 19 02 09. Glycerol only
19 05 03	Off specification compost	The compost must only come from the input types allowed this resource framework or the compost resource framework. This includes oversize material that comes from screening the compost.	Acceptable only if derived solely from input types allowed by this Quality Protocol and remains segregated from, and uncontaminated by, any other waste type.
19 06 03	Liquor from anaerobic treatment of municipal waste	<p>This must:</p> <ul style="list-style-type: none"> <li>- only come from the input types allowed by this resource framework</li> <li>- come from a facility that is independently certified as complying with BSI PAS 110</li> <li>- be in pasteurised and stabilised batches that are authorised by the Animal and Plant Health Agency.</li> </ul>	Acceptable only if derived solely from input types allowed by this Quality Protocol and remains segregated from, and uncontaminated by, any other waste type.



		Must not contain wastes that come from mechanical biological treatment facilities	
19 06 04	Digestate from anaerobic treatment of municipal waste	<p>This must:</p> <ul style="list-style-type: none"> <li>- only come from the input types allowed by this resource framework</li> <li>- come from a facility that is independently certified as complying with BSI PAS 110</li> <li>- be in pasteurised and stabilised batches that are authorised by the Animal and Plant Health Agency</li> </ul> <p>Must not contain wastes that come from mechanical biological treatment facilities</p>	Acceptable only if derived solely from input types allowed by this Quality Protocol and remains segregated from, and uncontaminated by, any other waste type.
19 06 05	Liquor from anaerobic treatment of animal and vegetable waste	<p>This must:</p> <ul style="list-style-type: none"> <li>- only come from the input types allowed by this resource framework</li> <li>- come from a facility that is independently certified as complying with BSI PAS 110</li> <li>- be in pasteurised and stabilised batches that are authorised by the Animal and Plant Health Agency.</li> </ul> <p>Must not contain wastes that come from mechanical biological treatment facilities</p>	Acceptable only if derived solely from input types allowed by this Quality Protocol and remains segregated from, and uncontaminated by, any other waste type.
19 06 06	Digestate from anaerobic treatment of animal and vegetable waste	<p>This must:</p> <ul style="list-style-type: none"> <li>- only come from the input types allowed by this resource framework</li> <li>- come from a facility that is independently certified as complying with BSI PAS 110</li> <li>- be in pasteurised and stabilised batches that are authorised by the Animal and Plant Health Agency.</li> </ul> <p>Must not contain wastes that come from mechanical biological treatment facilities</p>	Acceptable only if derived solely from input types allowed by this Quality Protocol and remains segregated from, and uncontaminated by, any other waste type.

19 08 12	Sludges from biological treatment of industrial waste water (from a process that treats wastes which are identified in section 2 of this resource framework)	None	Allowed only if uncontaminated by potentially polluting materials or substances harmful to anaerobic bacteria.
19 12 12	Other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11	This must: - only come from the input types allowed by this resource framework - be segregated from, and uncontaminated by, any other waste type - be biodegradable waste	Acceptable only if derived solely from input types allowed by this Quality Protocol and remains segregated from, and uncontaminated by, any other waste type
20 01 01	Paper and cardboard	This must meet the restriction for the corresponding waste type in Note 1 at the end of this section. Must not contain any non-biodegradable coating or preservative	Not allowed if any non-biodegradable coating or preserving substance present.
20 01 08	Biodegradable kitchen and canteen waste	This must meet the restriction for the corresponding waste type in Note 1 at the end of this section	None
20 02 01	Biodegradable waste	This must be biodegradable material such as: - manure - garden waste - green waste - horticultural waste - plant tissue - parks and garden waste - hedge and tree trimmings - grass cuttings and leafy materials  It must not contain: - material with chemical additives and toxic residues - road sweeping gully waste - dog faeces - Japanese knotweed	Including animal faeces, manure, garden waste, green waste, horticulture waste, plant tissue, parks and garden waste, hedge and tree trimmings, grass cuttings and leafy materials.
20 03 01	Mixed municipal waste	This must be separately collected biodegradable wastes that are the types allowed by this resource	Allowed only if separately collected biodegradable wastes otherwise allowed by

		framework. Any food packaging must meet the restriction for the waste type in Note 1 at the end of this section.	this Quality Protocol. If former foodstuffs are packaged, the restrictions given above on packaging wastes apply.
20 03 02	Waste from markets	This must be separately collected biodegradable wastes that are the types allowed by this resource framework. Such as plant material, fruit and vegetables. Any food packaging must meet the restriction for the waste type in <a href="#">Note 1</a> at the end of this section.	Allowed only if source segregated biodegradable fractions. Examples are plant material, fruit and vegetables – Restriction: Packaging waste from a market source is allowed only if it is otherwise allowed by this Quality Protocol.

### Requirements on compostables:

The Resource Framework includes this note.

#### Note 1

You can only use industrially compostable packaging and non-packaging items that are independently certified as compliant with at least one of the following:

- EN 13432
- EN 14995
- ASTM D6400

You can only use home compostable packaging and non-packaging items that are independently certified as compliant with at least one of the following:

- EN 17427
- AS 5810-2010
- NF T51-800
- TÜV Austria's certification requirements for home compostable packaging under their 'OK compost HOME scheme'

Previously the QP referred to: *'Biodegradable plastic packaging that is independently certified to BS EN 13432 or either of the similar standards DIN V 54900 or ASTM D6400 that is used to collect food waste shall be permitted. It must, however, be removed either prior to or after the digestion process to meet the physical contaminant limit in BSI PAS 110 or other approved standard.'*

If you do accept any compostable packaging or non-packing items, you should check they are certified to one of the above standards.