

Organics Forum: November 2025

Q&A and Actions Note

The Organics Forum held a meeting on 3rd November 2025. The agenda was as follows:

- *Welcome and Housekeeping* - Graeme Kennett, REA Organics Chair, WRM
- *Biowaste Regulatory Update* - Dan Pursglove, EA
- *Digital Waste Tracking* - Tom Ellis, EA
- *REA's CEO Address* - Trevor Hutchings, REA
- *Closing the loop on compostables: the Compostable by Design Platform* - Claudia Amos, CbDP
- *Organics Sector Readiness for Simpler Recycling* - Griff Palmer, WRAP
- *REA Organics Update* - Jenny Grant, REA Organics

Please note: This document covers only Q&A and actions arising from the meeting. A full slide deck of all presentations delivered at the Forum meeting can be found [here](#).

Biowaste Regulatory Update, Dan Pursglove, EA

Q: It's understood that deployments will need to be compliant with new Resource Framework requirements, but some sites will have two years get compliant under RPS317 - how will this work?

A: Not sure but can look into this.

Q: How and when will biosolids come under EPR?

A: Not sure - this was part of the Cunliffe review, but it was not included in the recent Defra consultation on updates to EPR. It was raised in the recent Efra select committee but there's been no confirmation yet when it will take place.

Q: Regarding the EA's comments on controlling emissions from digestate stored in lagoons (both stores within and outside of the permitted area), will the EA look at requiring retrospective covering of existing lagoons or will they only require covers on new sites?

A: Either the biowaste standard rules or appropriate measures contains a requirement to cover on-site storage. However, for existing sites it's a lower standard because retrofitting is challenging. If it's an offsite store, lagoon requirements would probably still be in place but would need to double check.

Note: BSI published a British standard on AD design - BS 24252 - in July. The EA is currently reviewing it to align appropriate measures guidance to potentially incorporate the standard into the EA's guidance. The standard covers both waste and non-waste inputs.

- *Action: EA to confirm how deployment requirements will align with two-year RPS for certified composting & AD sites (REA can connect EA with the concerned member)*
- *Action: EA to confirm requirements for covering digestate storage (REA can connect EA with the concerned member)*
- *Action: REA to consider GHGSat attending a future meeting (EA can make the introduction)*

Digital Waste Tracking, Tom Ellis, EA

Q: Previously, industry was told that there would be a 48hr deadline to submit data to the platform - is this still the case?

A: Yes, in the draft legislation, this requirement is worded as 'two working days' but operators will have a chance to update data after this time, if necessary (e.g. to correct errors in the data).

Q: Are the ABP commercial documents being considered as part of the DWT development process? Operators must ensure they're meeting both the waste duty of care regulations for transfer notes, and the ABP commercial documents. There's a lot of overlap in the requirements and currently many operators are able to manage this as a single process - will the DWT system allow this, or will it create two systems that run in parallel?

A: The EA is looking to eliminate duplication where possible, but this would not mean removing the ABP requirements, which are not a part of Waste Tracking.

Q: As a mobile plant holder, we send all our waste under waste returns. Will mobile plant permit holders be subject to mandatory Digital Waste Tracking from next year?

A: Yes, mobile plant permits will be included from October 2026. Defra should be in contact with mobile plant operators to ensure they've been factored into the design.

Q: How will the system deal with end-of-waste certified material, as well as self-certified end of waste material?

A: The idea is that exempt sites will come into play in Phase 2 (as well as RPSs), but the scope and practicalities of Phase 2 are still to be defined by Defra. It would be great to work with industry to help with defining Phase 2, but this will follow Phase 1 implementation in 2026.

- *Action: REA to connect the EA and mobile plant operator to provide input on the design of digital waste tracking*

Organics Sector Readiness for Simpler Recycling, Griff Palmer, WRAP

Q: How much consideration is being given to the increasing amount of digestate being produced in England? In terms of applying digestate to land, operators are competing with larger volumes of slurry, while focus on the agronomic need of the crop is increasing, all while the land bank is decreasing – how is this being factored into Simpler Recycling?

A: WRAP is exploring end markets for digestate, including the land bank challenge and potential valorisation options that may be able to mitigate this

- *Action: REA to share outputs from Green Gas Taskforce's next project—which will look at land bank and digestate supply—with members, once available*
- *Action: REA to share details about the WRAP project on 'Organics Sector Readiness for Simpler Recycling' in the next Organics newsletter*