

# Minutes of 77th UK Chemical Stakeholder Forum meeting, 25 September 2019, BEIS Conference Centre, London

## 1. Welcome by Chair (Camilla Alexander-White)

The Chair welcomed everyone to the meeting (see apologies in Annex A).

## 2. Approval of agenda

The draft agenda was approved.

## 3. Approval of draft minutes of the 75th UKCSF meeting (UKCSF/19/06)

The draft minutes of the 75th meeting, held on 19th June 2019 were approved. It was noted that Simon Marsh of the Chemical Industries Association (CIA) had yet to give a response to a question about how the Chemistry Council strategy was addressing Climate Change.

## 4. Update on CSF

Camilla Alexander-White reminded the group that the Chair of the meeting was now going to be drawn from the Steering group on a rotating basis with member of the steering group chairing one or two meetings. She highlighted that a colleague of hers was attending to represent RSC's interests, whilst she chaired. She also reminded the group that the meeting was to be held under Chatham House rule.

**Organisational profiles** - This was a request for UKCSF members (and other attendees) to provide some basic information about their organisation and their interest in the Forum. The steering group discussed this and thought that it would be useful to help organisations attending the CSF to better understand their fellow attendees and to enable more collaboration in support of the CSF's goals.

## 5. Chemical Strategy Session (Morning)

Susie Willows and Chloe Meacher, the Joint Heads of Chemicals and Pesticides at Defra introduced the Chemicals Strategy. The presentation covered the work that the team has completed so far, including meetings with attendees of the UKCSF. They introduced the aims of the day's activities on the Strategy and re-confirmed Defra's commitment to developing the strategy with a cross government approach.

The first small group discussions focused on identifying key themes that the Chemicals Strategy should address. Two questions were posed to attendees:

- What do you think are the key issues to be addressed? and
- Why you think these issues are important.

For a summary of the reports back from each group see Annex C.

## 6. The Environmental Audit Committee (EAC) inquiry into “Toxic Chemicals in Everyday Life”

Dr Anna Watson, Head of Advocacy at ChemTrust gave a presentation of ChemTrust’s views on the EAC report followed by Roger Pullin Head of Chemicals and Health Policy at the Chemical Industries Association (CIA) gave a presentation of the CIA’s view on the EAC report. Attendees discussed the report in small groups. There was no feedback in plenary.

## 7. 60 Second Pitches

There were two 60 second pitches:

- Dr Karen Stroobants of the Royal Society of Chemistry (RSC) introduced herself as a new member of the UKCSF and promoted the “Principles for implementing future waste strategies” document.
- Joanna Sacks of the Consortium of Local Education Authorities for the Provision of Science Services (CLEAPSS), introduced the work CLEAPSS does to support practical science and technology in schools including educational resources for Chemistry.

## 8. Net Zero

Cloe Cole of the Climate Change Committee (CCC) gave a presentation on the CCCs Net Zero – The UK’s contribution to stopping global warming report, outlining a potential framework for reaching Net Zero greenhouse gases by 2050. It was specifically noted that industrial emissions would need to see a steep decrease by 2050. The following questions arose:

- Membership of the CCC panel was noted as having members with strong ability to identify **what** is needed to deliver Net Zero. However, it was noted that there is only one industry representative on the CCC panel and perhaps there was a need to change this in moving to looking at **how** we achieve net zero. In response, Cloe Cole noted that the CCC will be holding a series of roundtables with attendees across the industrial sectors ahead of the 6<sup>th</sup> Carbon budget.
- A question was raised regarding the action that could be taken **on the domestic sector**. It was noted that industrial energy combustion had dropped whilst domestic energy consumption had not. Cloe noted that her presentation had specifically focussed on industrial emissions but noted that there was a need to take **action in other sectors including domestic**. Cloe noted there would be a report on behavioural change published in early October.
- It was noted that the cost estimates, as a proportion of GDP, for achieving net zero were the same as the 2008 estimate for reaching an 80% reduction against 1990 levels. The reason for this consistency in costing was queried. It was explained that due to a decrease in the costs of technology, the estimated costs to effect Net Zero had not changed. It was not due to an overall reduction in emissions, and did not take into account the potential economic benefits and savings that could come as a result of decarbonisation, such as savings for the NHS.

- A question was raised regarding the movement of UK industry out of the UK due to overseas competitors not facing the same costs. Cloe noted that avoiding offshoring and carbon leakage was a key part of the CCC's advice to government for setting policy, and the Net Zero report laid out several options to avoid this, such as border tariff adjustments and product standards.
- A question was asked about whether we could achieve the same overall reduction in emissions at a reduced cost by focussing on reducing emissions overseas. In response, Cloe noted that the UK has a responsibility to address its own emissions and has made a pledge to do this and in the process, demonstrate that net zero can be achieved.

## **9. Chemical Strategy Session (Afternoon)**

At each table attendees discussed the themes identified in the Chemicals Strategy morning session. Annex C provides a short summary of some of the discussion

## **10. CSF Sub Groups**

### **Chemical-product-waste UK CSF sub-group**

Max Folkett of Defra outlined the work that the new Chemical-Product-Waste UKCSF sub-group had been doing. He highlighted the issues of chemicals in products causing difficulties at end-of-life, as set out in the policy update paper. The group was seeking to address these challenges and had been working to map the existing policy and legislation as well as the initiatives underway. A particular focus for the immediate future was to contribute to OECD case studies of policy misalignment at the chemical/waste interface. Examples of this included the presence of brominated fire retardants which are Persistent Organic Pollutants (POPs) in Waste electrical and electronic products which led to a tension between the objectives of destroying products containing POPs above a certain threshold and recycling targets. Attendees were asked:

- Could they consider joining the group and contributing to the discussions, particularly by bringing detailed knowledge of a particular product group, for example, furniture, textiles or construction products or management of products as waste.
- To submit case studies that could be included in the UK's contribution to the OECD.

RSC announced that they would be joining the group.

### **UN's Strategic Approach to International Chemicals Management – international framework for chemicals and waste (SAICM)**

Claire Dixon of Defra introduced the UN's Strategic Approach to International Chemicals Management (SAICM) and the work underway to agree on a framework for chemicals and waste post 2020. She highlighted that the Defra team would be attending several meetings in the lead up to the International Conference in Chemicals Management in October 2020. Defra would like to hear views from stakeholders on the proposed objectives and targets under the framework which will rely on many different actors for their implementation. She mentioned that the UK had recently hosted a workshop to help develop indicators that would sit underneath these targets.

Another key area of discussion related to what's known as the 'Science-policy interface (SPI).' A recent review suggested that a core weakness of SAICM is that it has no mechanisms to comprehensively assess progress or to identify emerging problems and bring them to the attention of governments. This hampers its ability to monitor progress and direct resources and attention to the most pressing areas of concern. There have been a number of discussions around a new SPI body with suggestions ranging from setting up a full inter-governmental panel (similar to IPCC and IPBES for climate change and biodiversity respectively) to those who would like to see the current SPI bodies expanding their scope to include wider issues. The next CSF meeting would be used to explore this area in more detail.

Anyone interested in joining either sub-group is invited to contact the Defra secretariat.

## **11. Policy and Regulation Update**

There were no questions on the policy update paper (UKCSF/19/06).

Simon Johnson from Defra provided an update on the preparations made to establish an independent UK REACH regime after Brexit. Simon spoke about the REACH Secondary Legislation, updates to the UK REACH IT system and future stakeholder engagement.

Further information can be found on [gov.uk](https://www.gov.uk) or by emailing [REACH-IT@gov.uk](mailto:REACH-IT@gov.uk)

A question was raised regarding the transitional arrangements set out in the REACH etc. (Amendment etc.) (EU Exit) (No. 2) Regulations 2019 for existing UK-held REACH registrations.

It was clarified that UK-held REACH registrations will be automatically legally recognised (grandfathered) in UK REACH at the point of exit. Simon clarified that grandfathering will apply to all registrations (including intermediates) held by UK-based entities, including importers and UK-based Only Representatives (ORs) that exist at the time of exit, and all registrations held by UK entities at any point since 29 March 2017.

## **12. Next meeting**

The Chair thanked everyone for attending. The next meeting would be held on 15 January 2020 again at the BEIS Conference Centre.

## **Annexes**

**Annex A: Attendance and apologies**

**Annex B: Presentation on the Chemical Strategy**

**Annex C: Summary of discussion on the Chemical strategy**

**Annex D: ChemTrust Presentation**

**Annex E: Climate Change Committee presentation**

For accessibility reasons, Annexes B, D and E will not be made available on the UKCSF website. Copies can be obtained by contacting the secretariat (see website for email address).

## **Annex A: Attendance and apologies**

### **Attendees**

Camilla Alexander-White - Royal Society of Chemistry

Ian Axford - LGC Group

Richard Ayton - Dow

Luke Buxton - Chemical Watch

Linda-Jean Cockroft - RPA Ltd

Cloe Cole - Climate Change Committee

Michael Cooper - Chemical Business Association

Matthew Davies - British Plastics Federation

Natasha Gerard - BAE Systems

Emma Grange - Cruelty Free International

Bud Hudspith - Trades Union Congress

Pat Jennings - Chartered Institution of Wastes Management (CIWM)

Helen Kean - Anthesis Group

Craig Melson - Tech UK

Liz Nicol - Wood plc

Crea O'Hanlon - EUK Consulting

Mamta Patel - Chemical Watch

Libby Peake - Green Alliance

Piat Piatkiewicz - Non-Ferrous Alliance

Roger Pullin - Chemical Industries Association

John Reid British - Association for Chemical Specialities

Clara Ritch - 3M

Caroline Rainsford - CTPA (Cosmetic, toiletries and perfumery association)

Andy Roberts - UKPIA (UK Petroleum Industry Association)

Joanna Sacks - CLEAPSS

Silvia Segna - Chemical Industries Association

Gareth Simkins - ENDS

Wayne Smith - British Coatings Federation

Gilly Stoddart - PETA

Karen Stroobants - Royal Society of Chemistry

Sharon Todd - Royal Society of Chemistry

Anna Watson - Chemicals, Health and Environment Monitoring (CHEM) Trust

David Wright - UK Lubricants Association

## **Government officials**

Kasim Ali - Defra

Siobhan Amutharasan - Defra

Jack Blandy - Defra

Xander Child - Defra

Katie Dick - Defra

Harriet Drake - Defra

Max Folkett - Defra

Stavros Georgiou - HSE

Hannah Jay - Defra

Simon Johnson - Defra

Gin Masiulyte - Defra

Chloe Meacher - Defra

Fatima Nasser - Defra

Tom Nickson - EA

Rory O'Connor - Defra

Tom Peel - Defra

Eloise Procter - Welsh Government

Ovnair Sepai - PHE

Vicky Tuck - Defra

Emily Weigold - Defra

Susie Willows - Defra

## **Member Apologies**

David Bolton - British Retail Consortium

James Clark - Green Chemistry Network

Steve Fletcher - Knowledge Transfer Network

Christine Heemskerk - Trading Standards Institute

Mike Holland - Independent

Philip Malpass - UK Cleaning Products Industry Association

David Santillo - Greenpeace

Melissa Wang - Greenpeace

Gene Wilson - Environmental Services Association

## **The following members were substituted by colleagues**

Susanne Baker - TechUK

Philip Law - British Plastics Federation

Steve George - ADS (UK Aerospace, Defence, Security and Space industries)

David Taylor - Society of Chemical Industry

## Annex B: Summary of discussion on the Chemical strategy

**Note:** *The text below provides a very brief note of some of the points raised in small groups at the meeting. We don't know how widely the opinions expressed are shared.*

### Session 1:

The Forum discussed their priorities for a Chemicals Strategy in small groups. The discussion covered:

- The need to map out what is in place now and identify policy gaps
- Preventing/Reducing toxicological risks;
- Consumer protection, including education and the role of non-regulatory approaches
- Legacy chemicals;
- Chemical Mixtures and the “cocktail” effect;
- Governance – role of expert committees / stakeholder groups – ensuring transparency
- Circular economy and communication through the supply chain
- Enforcement
  - Post Brexit regulatory landscape (for example access to RAPEX)
  - Accountability
  - Resource availability
  - Trading standards
- The economic impacts of regulation
- Test methods and toxicology and exposure
- Human biomonitoring
- The innovation principle
- The need to prioritise actions
- The importance of strong governance and transparency (both during strategic formulation and implementation)

## Session 2:

The attendees had a chance to participate in two small group discussions. Some of the points made included:

**Enforcement** – some expressed the view that the current regime is ineffective: it needs more resources, more training, and more powers. Some businesses try to find loopholes and get out of their obligations, while some are not aware of their obligations or cannot verify safety of their supply chains.

**Risk assessment** – risk is more complicated to assess than hazard and therefore there is a need to consider whether exposure scenarios are appropriate. It was noted that there is a need to take a pragmatic approach to risk, considering the benefits/costs to society. It was noted that REACH is fairly effective as a framework, though there are aspects that could be improved.

**Consumer education and non-regulatory approaches** – the discussion noted that consumers can be both protected or educated, but a combination of both is more effective, citing that consumers might not be aware of the protection that is happening, therefore they might not change behaviours. Communications need to be targeted in particular towards educating people on making good purchasing choices and sound use of chemicals. It was also noted that there is a need for effective enforcement to enable consumer trust. For particular product types, a more “light touch” approach was identified as possibly appropriate.

**Chemical mixtures** – any use of the term of chemical mixtures should include a clear explanation as to what is meant by this term e.g. unintentional mixtures and not intentional mixtures and, that when looking to address this a life cycle analysis should be incorporated. It was noted that any approach to testing for chemical mixtures should try to avoid increased animal testing wherever possible.

**Net zero** – the Forum noted that net zero incorporated a lot of strategies and particularly provided some learn opportunities for the Chemicals Strategy. It was suggested that there are overlaps and perceived conflicts with the Circular Economy.

**Governance transparency and role of expert committees/stakeholder groups** – there are several principles to be implemented to ensure transparency, such as open meetings, timely reporting, clear data evaluation principles, multidisciplinary representation, public access to information. Barriers exist, such as how to ensure representative expertise, and availability of resource and expertise to participate in the committees.

**Test guidelines and toxicity** – We need to be evolving new test methods for animal testing, or ensure harmonization between the UK and Europe if we are not testing on animals. It was suggested that ‘in vitro’ methods have been more validated than testing on animals, and ‘in vitro’ may be more cost effective in long run, noting the ability to test several chemicals at once.

**Circular economy and communications through the supply chain including chemical-product-waste interface** - transparency and information flow through the supply chain is important, including consideration of how classification and description of waste can be improved whilst ensuring commercial confidentiality. Producer responsibility only addresses industry producers, consumers’ behaviour also needs to be addressed.