

Department for Environment, Food and Rural Affairs

# Consultation on the update of the UK National Implementation Plan (2007) for the Stockholm Convention on Persistent Organic Pollutants

## Summary of responses

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Llywodraeth Cymru  
Welsh Government



The Scottish  
Government



Department of  
the Environment  
[www.doen.gov.uk](http://www.doen.gov.uk)

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1. This document is a summary of responses received to the consultation on the UK National Implementation Plan (NIP) for the Stockholm Convention on Persistent Organic Pollutants 2012.
2. Over 150 letters were sent out to stakeholders, including consumer groups, Non-Governmental Organisations and industry. The consultation was also published and comments were invited via Defra's website. Five responses were received. A list of organisations and individuals who responded to the consultation is provided at Annex 1. The respondents' formal replies are available on request through Defra's consultation's coordinator. Not all consultees responded to all questions in the consultation document, with some raising questions relating to their specific subject areas.
3. In general the respondents welcomed the NIP consultation. Their responses highlighted the following areas of interest in which they felt that further work or development would be beneficial.
4. Two respondents suggested that a clearer assessment could be made of changes resulting from specific actions if UK emissions inventory data were compared and validated with actual data. It was suggested that data, such as that captured under the WILDCOMS network on concentrations of POPs accumulated in biota in terrestrial, freshwater and marine habitats, can provide a more holistic overview of long-term trends.
5. Two respondents also stressed the need to achieve a better level of understanding of diffuse emission sources. This was particularly highlighted in the context of the assertion in the NIP that waste water treatment works were the key sources of emissions to water. It was pointed out that sewer networks receive flows from households, roads, businesses and as a consequence of atmospheric deposition, and that controlling emissions at source may offer the most cost-effective means to reduce POPs in the environment.
6. The continuing contribution to emissions resulting from the open burning of waste and other materials was highlighted and it was felt by one respondent that the scale, nature and control of the source needed to be better understood. The respondent felt that information campaigns undertaken to date might not have been fully effective and that there was a need to develop a more effective approach to addressing the problem.
7. One respondent considered that insufficient attention is paid to lessons learned from major food contamination incidents. In particular, the respondent considered that insufficient attention had been paid to the risk of contamination from improper disposal of PCB materials and queried what had been done to build resilience in the system to reduce the risk of contamination from improper disposal of PCB materials.

8. Finally, one respondent considered that the Government needed to devote resource to legacy issues relating to previously banned POPs. Particular reference was made to the need for the safe disposal of pesticides and materials treated with POPs; and the effectiveness of waste recycling as a means of reducing quantities of dioxins consigned to landfill.
9. The Government welcomes these constructive contributions. Where appropriate, text to accommodate these has been included within the finalised NIP.

## **Responses to the consultation questions**

### **The review of the 2007 UK National Implementation Plan (NIP) for persistent organic pollutants (POPs)**

#### **Question 1:**

On the basis of the review of the UK Dioxins Action Plan (Annex 6 of the draft updated NIP), do you consider that:

- (i) the reported trend in the decline in emissions for these substances is representative?
- (ii) we have captured all potential UK sources? and,
- (iii) if not, what improvements would you suggest?

Three respondents answered this question. Two considered that the decline in emissions for these substances was representative and all potential sources had been captured. One felt that improvements could be made to the inventories by cross-referencing them with monitoring data.

The Government will explore options for utilising other data sources and for undertaking further monitoring to validate emissions inventory data.

### **The implementation plan for the additional POPs and proposals for action in the updated NIP**

#### **Question 2:**

Would further assessment of the ongoing use of materials containing Lindane and potential contamination arising from historic disposal of manufacturing waste be beneficial?

Two respondents answered this question both of whom considered that a further assessment was warranted. One respondent suggested that attention should be paid to the potential for contamination to arise from reuse, recycling and disposal.

### **Question 3:**

Would an assessment to establish the amount of potential alpha and beta hexachlorocyclohexane-contaminated waste be beneficial?

One respondent answered this question and considered the assessment would be beneficial as alpha and beta hexachlorocyclohexane are by-products of Lindane.

In respect of the responses to questions 2 and 3, the Government will consider cost effective and proportionate options for improving understanding of emissions from related sources alongside the actions outlined in Sections 5.1.1 and 5.1.2 of the NIP.

### **Question 4:**

Should we consider how to improve the disposal of contaminated ash from diffuse combustion sources and, if so, how could this be achieved?

Two respondents answered this question. One considered that the diffuse source of pentachlorobenzene is still at a substantive level and that alternative measures for handling of domestic ash could include suitable collection at recycling centres. The other respondent suggested that some assessment of actual risks and impacts would seem appropriate, indicating that releases to different media are not at all equivalent and that focusing on mass alone may be a poor guide for risk.

The Government will consider cost effective and proportionate options to develop understanding of the relative risks and impacts of different diffuse sources, and alternative handling of domestic ash.

## **Emissions from consumer products and domestic activity**

### **Question 5:**

How could we measure emissions of POPs, e.g. Polybrominated diphenyl ethers (PBDE), perfluorooctane sulphonic acid (PFOS), from unregulated consumer products?

Two respondents answered this question, suggesting that there is a need for focused laboratory or field research to assess 'typical' values of emissions of polybrominated flame retardants from clothes and furniture and how they are released during disposal or recycling. One respondent highlighted a potential concern around legacy flame retardants and decabromodiphenyl ether (if/when banned) being recycled into new clothing or by-products for the consumer market.

The Government has already instigated research to understand levels of polybrominated flame retardant emissions in furnishings. We will also explore opportunities to undertake cost effective and proportionate research into the fate of legacy flame retardants.

## **Question 6 & 7:**

(6) What opportunities might there be to reduce/control such emissions from unregulated consumer products?

(7) What steps do you consider could be taken to reduce human exposure to PBDEs found in indoor dust?

One respondent answered both questions indicating that decabromodiphenyl ether should largely be addressed via its impending REACH regulation together with a better understanding of the fate of polybrominated flame retardants when recycled.

## **Question 8**

What other low-cost options could be considered to improve knowledge and raise awareness about what should not be burned in the backyard?

Two respondents answered this question. One suggested that it may be beneficial to issue guidance about what should not be burned and suggestions on how to dispose of such waste. The other respondent suggested that a multi-pronged approach, involving some education as well as effective interventions to identify and address open burning, were required.

The Government will consider options to build on existing public awareness raising initiatives around the issue of backyard burning.

## **Question 9**

We intend to redirect resources towards monitoring of the more recently listed POPs. Do you foresee any problems with this approach?

Two respondents answered this question. One considered that there was little to be gained from continued monitoring of legacy POPs unless there were new, cost effective opportunities to further decrease levels. The other respondent suggested prioritising newer POPs and continuing to improve inventories where there are weaknesses. The respondent suggested that a smartly designed system that identified and reduced risks with monitoring at key points in the chains would be valuable.

While the Government will focus efforts on monitoring of more recently listed POPs, efforts to develop and refine existing emissions inventories will be maintained and work has been instigated to disaggregate the inventory data further to provide a better understanding of POPs emissions.

# Annex 1: List of respondents to the consultation on UK National Implementation Plan on Persistent Organic Pollutants

Respondent	Company/organisation
Patrick Dyke	PD Consulting
Tim Marczylo	Health Protection Agency
W Piatkiewicz	NON-Ferrous Alliance
Professor Richard Shore	Member of Public
Mark Williams	Scottish Water

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This document/publication is also available on our website at:

<https://www.gov.uk/government/consultations/update-to-the-uk-national-implementation-plan-2007-for-the-stockholm-convention-on-persistent-organic-pollutants>

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