Minutes of 82nd UK Chemical Stakeholder Forum meeting, 10th June 2021, Virtual Conference

1. Chair's welcome

The Chair welcomed all to the meeting. See Annex A for attendance and apologies.

The Chair explained that the meeting was virtual due to the current circumstances of the Coronavirus pandemic (Covid-19). The Chair of the meeting was drawn from the Steering group on a rotating basis and the meeting was held under Chatham House rule.

The draft minutes from the 81st CSF February meeting (UKCSF/20/03) were approved.

2. Chemical pollution and the environment

The Marine Conservation Society (MCS) and CHEM Trust presented on chemical pollution and the environment. See Annex B.

An attendee asked whether monitoring should be included in the national measurement strategy. They noted that the Royal Society of Chemistry (RSC) were concerned that this strategy did not include any information about environmental pollution monitoring and were of the view that it should be a complementary to the UK chemicals strategy. MCS responded that environmental monitoring should be included at all levels possible to increase its availability and followed that they would investigate the raised question.

Another attendee asked if work was being done on the degradation of chemicals once they get into the environment. CHEM Trust responded that this had been identified as an area where more research was needed. They added that there was already an existing difficulty in monitoring the effects of well-known contaminants, let alone all chemicals. The attendee noted that there was a lot of well-known work being done on chemical modelling of these degradation pathways so, it could be possible to work out how long substances take to break down and identify which ones break down into a more harmful chemical.

An attendee asked for examples of "stressors" and this could be put into perspective with respect to "chemical pressures". MCS responded that climate change, habitat loss and ocean acidification, with regards to marine life, were stressors. However, it was unclear how to quantify the comparison between stressors and chemical pressures. They emphasised that chemical pollution reduces the resilience of marine and freshwater life which would lead to them being more susceptible to climate change effects or habitat loss and vice versa. CHEM Trust provided an example relating to climate change and chemical pollutants impacting on polar bears and impairing their ability to accumulate fat and energy. This would become a stressor for polar bears, which decreases their chance of survival.

Another attendee asked for thoughts on the Netflix documentary *'Seaspiracy'* which highlights that commercial fishing is the biggest stressor for biodiversity life. MCS agreed that there were issues with commercial fishing and that although the documentary made good points, they were concerned that this was framed as the only problem, overshadowing other issues. There were many other human pressures to consider, be they chemicals or plastics and it was difficult to quantify any comparisons between other stressors. CHEM Trust added that there is not one way or method to quantify chemical pollutions data is not available in comparison to other issues such as climate change e.g., greenhouse gas or carbon emissions. There is no metric like this for chemical pollution and it would be more useful to have this to assess the present situation.

A question was asked about the concept of mixtures and cocktail effect, what the status of the UK was in this relation to this and if there was anything to learn from the EU. They also asked how mixtures in the environment would be monitored and measured. CHEM Trust responded that there was much work being done on this at a European level, particularly on integrating the reality of the mixture in risk assessments of chemicals. The mixture assessment factor could be found when the safety of a chemical is assessed, and a value integrated that would account for all the unknown possible effects. They added that in terms of monitoring, this was about increasing "non target monitoring" to a wider range of screening of chemicals in the environment.

Attendees discussed questions, posed by MCS on chemical pollution and the environment, in break-out groups using EasyRetro. See Annex F for the noted discussion points.

3. UK Marine Strategy & Contaminants in the marine environment

A Defra official presented the UK Marine Strategy. See Annex C. The Centre for Environment, Fisheries and Aquaculture Science (Cefas) presented on contaminants in the marine environment. See Annex D.

An attendee noted that polybrominated diphenyl ethers (PBDEs) had been phased out and substituted. They asked if there would be monitoring of these newly substituted compounds in the future. Cefas responded that they used to have a method developed and widespread screening programme. They looked at many chemicals but, the replacement chemicals were unknown at that time. Little was detected and the levels of chemicals being tested were lower than that of PBDEs. As a result, they used this information as a baseline to be picked up later when they had a greater understanding of what the chemicals were.

Another attendee expressed that it would be interesting to know about how long chemicals take to leave the factory, what they are used in, the lifetime of the chemical and how the chemical was disposed of. Cefas responded that presently it was difficult to know what the chemicals that needed monitoring were e.g., they had previously put a lot of effort into monitoring over 30 flame retardants but, roughly ten were detected in the UK and most of them were sporadically.

Following this, another attendee asked if there would be baselines from cumulative concentrations. Cefas responded that they could report some of the flame retardants but, they all had different potencies and effects, so it was only indicative.

An attendee noted that the lifecycle of these chemicals was complicated e.g., tributyltin, which was phased out around 30 years ago, would undergo oxidative degradation that results in the butyls dividing and remaining tin oxide. Finally, another attendee noted that they hoped biological effects could give an indication of the sum of exposure, with the caveat that each effect measured was specific to the respective chemicals.

4. Prioritisation and Early Warning System (PEWS) for chemicals of emerging concern

The Environment Agency presented on their Prioritisation and Early Warning System (PEWS) for chemicals of emerging concern. See Annex E.

An attendee asked what the next steps were for substances and regulation and if there were links to UK REACH. EA responded that PEWS was not a substitute for UK REACH but, that the intention was for it to sit alongside UK REACH. Information could be fed both ways e.g., PEWS informing the Chemical Assessment Unit in Health & Safety Executive (HSE) and UK REACH informing PEWS.

Another attendee noted that many substances on the presented list were designed to be biologically active. However, substances such as Polychlorinated Biphenyls (PCBs) or Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS) were not designed this way. They asked if these were picked up and how. EA responded that substances for more industrial uses had gone through PEWS already e.g., fire retardants. PFAS was not a focus for PEWS but, there was one PFAS being put through to see how it performed.

An attendee noted that the British Standards Institute (BSI) FW/6 Committee, reviewing fire regulations, was more focused on furniture than people. They added that more downstream stakeholders needed to be involved, with officials from Defra, EA, and PHE sitting on the committee. They continued that NGOs had tried to join but, were excluded despite them being able to provide guidance, and inclusion of those with interest in downstream consequences was important to avoid always playing catch-up. Another attendee agreed that there needed to be a more joined up approach across the “knowledge chain”, highlighting that those across industry use chemicals that benefit locally without thinking of the consequences, doing things in uncontrolled and unconsidered way. Another attendee noted that BSI committees were difficult to be involved in and there needed to be better mechanisms for this to ensure they had the right experts.

An attendee asked if there was a process to revisit parked substances under PEWS. EA responded that there was intention to revisit these every few years. There were ongoing discussions about the frequency, especially for high-risk low-certainty substances.

5. Chemicals and UK water companies

Water UK presented on how chemicals are used by industry: chemical resilience and innovation. See Annex G.

An attendee asked for an explanation of an Asset Management Plan (AMP). Water UK responded that the water industry went through regular price reviews which determined how much companies could spend in a 5-year period. This was an opportunity to refresh the ways they thought about chemical resilience.

Another attendee commented that they presumed industry purified drinking water and asked for specific examples of the chemicals eliminated and the concentrations of those remaining. Water UK responded that different chemicals and contaminants had different rules or guidance around monitoring and removal. They gave the example of PFAS, which was monitored under drinking water safety plans, for which action is taken in areas of high risk. If the substance fell under a particular tier, they would regularly monitor for exposure to determine if there was a risk to human health and act. They would also look at alternative sources and how to remove them. In extreme cases, they would contact the Drinking Water Inspectorate to take regulatory action but, this would depend on the chemical.

An attendee noted that wastewater treatment chemicals, such as flocculants, only had short stocks and with EU Exit, transport could be disrupted and potentially lead to severe consequences. They asked if Water UK had been involved in any action on this or if there were any initiatives to encourage companies to have greater stockpiling. Water UK responded that they had considered this when looking at risk, however, often the lifespan of these chemicals did not necessarily support stockpiling. Another attendee added polymer availability was good and most of it made in UK. Typical water companies held 2-3 months of stock, with 6+ months available in the UK at any one time, including all raw materials.

Another attendee asked what Water UK were doing to assess future vulnerabilities regarding changes to classification of certain chemicals, e.g., REACH for polymers. Water UK responded that the water industry maintained a risk register which looked at future risks, such as policy changes, and new evidence and information. They regularly assessed these risks and looked for possible alternatives, ensuring that suppliers were aware of upcoming regulatory changes. They added that they were in close liaison with government departments, and most companies in the water industry were involved when REACH came in so, already had plans in place when this occurred.

Another attendee asked if Water UK would elaborate on circular economy initiatives and a move away from the linear supply change model. They asked if there were any opportunities in wastewater treatment. Water UK said they were looking at this, especially regarding long-term chemical resilience. Interdependencies, such as carbon savings, were something to nurture and they were also undertaking work to map out who the other users of their chemicals were, their innovations and their level of demand. They were also considering how they could look at demand management for chemicals and the relation to their own demand. Finally, they were also looking at using bioproducts as much as possible.

6. Chemical Investigations Programme

The UK Water Industry Research (UKWIR) presented on their Chemicals Investigation Programme (CIP). See Annex H.

An attendee asked if nature-based solutions were being considered within the CIP. UKWIR responded that catchment studies identified sources of water, e.g., in industrial run-off or farming, and alternative controls had been looked at. Sustainable drainage systems (SuDS) schemes had not been considered but, individual elements such as reedbeds had.

Another attendee congratulated UKWIR on the collection of their strong data set and queried whether recovery to land was still a main route to deal with sludge cake from the treatment process. UKWIR confirmed this is still a significant route of recovery.

An attendee asked if the CIP3 results would be made publicly available. UKWIR confirmed that they would and followed that the CIP1 and CIP2 results and data sets were accessible online - UKWIR's Chemical Investigations Programme.

7. Policy Update

A Defra official presented an update on the UK Chemicals Strategy. See Annex I.

An attendee asked if there were any plans to continue some alignment with the EU. The official responded that it was too early to say, as they were working to assemble building blocks around the scope and principles of the strategy.

Another attendee noted that if UK formed its own chemicals strategy, there would be a risk of bureaucratic burdens to business so, the approach must be pragmatic. They added that doing more work transnationally with the Organisation for Economic Co-operation and Development (OECD) would ensure there was less diversion and a proportionate chemicals management approach.

An attendee noted that under EU REACH, the distance between the authorities and industry was large. They asked if it was possible, without breaching competition rules, to have an open-door approach in the UK, much akin to 15 years ago. Defra responded that they were unsure of the context of this example but, would be interested to discuss further. Another attendee argued that for protecting human health and the environment, there needed to be confidence in the authorities being transparent, including having records of correspondence.

Another attendee asked what the vision of protecting the environment meant to Defra. Defra explained that this meant what the environment should look like in 20 years from a chemicals perspective. The attendee asked if farming and fishing should be stopped for protecting the environment. Defra responded that this was out of their remit for a UK Chemicals Strategy and offered to continue the discussion in writing.

A question was asked about the timeline for engaging with stakeholders and how the EU Chemicals Strategy was being used to inform the UK's approach moving forward. Defra responded that they were keen to engage with stakeholders within the upcoming months. They added that the EU's strategy was a holistic and wide-ranging strategy, and they were tracking its implementation. A question was asked about the timeframe for a public consultation on the Chemicals Strategy. Defra responded that there was no timeframe yet.

An attendee asked how Defra would innovate replacements for chemical products and minimise animal testing. Defra responded that the Department for Business, Energy, and Industrial Strategy (BEIS) was responsible for this policy area but, they were working closely with them to streamline that process. Reducing animal testing was an existing government commitment so, there was a strong basis to include this in a UK Chemicals Strategy.

Another attendee asked about the Minamata Convention and noted that they were running a campaign in Europe to phase out the trade of dental amalgam. They asked what Defra's position was on this and if they would support the campaign. Defra responded that responsibilities regarding dental amalgam were led by the Department of Health and Social Care (DSHC) and would provide a contact in writing.

8. CSF working groups update

8.1 Green Feedstocks

The working group lead presented an update on the Green Feedstocks working group. See Annex J. They noted that they would be moving the group's work to sit under the Chemistry Council moving forward but, that interested CSF attendees were welcome to join.

8.2 Essential Use

The working group lead presented an update on the Essential Use working group. See Annex K.

An attendee noted that it was important to find more sustainable ways to make things, especially where chemicals are used gratuitously e.g., PFAS in McDonald's paper bags. The lead highlighted that they had done some testing on PFAS in food packaging and that in the EU, there was pressure from member states and actors within, to have a more robust chemical management system e.g., PFAS didn't exist in McDonald's Dutch packaging.

An attendee asked how the essential use concept differs from processes under the authorisation regime. The lead responded that essential use applies to groups of chemicals rather than individual chemicals, for which risk assessment processes take time. Another attendee argued that grouping was different to essential use and that authorisations could also be made to groups of chemicals. The issue was rather when to ban a chemical or stop its manufacturing, and how to regulate on a basis of groups of substances rather than substance-by-substance. The lead responded that it was very rare for groups of chemicals to be authorised.

A working group member noted that programmes of measures in Europe took a general and tactical approach, e.g., they worked with local authorities to reduce nonylphenol in cleaning products or with chemists to stop stocking toothpastes with triclosan. They continued that the working group came up with a similar idea for QR codes on sofas to find out what the flame retardants they contained. The group were discussing the extent to which the UK was missing out on tactical approaches, and how to engage this into the space.

An attendee asked how early in the regulatory process should essential use be addressed. The lead responded that the working group had not reached one view on this.

8.3 Global Chemicals Strategies

The Secretariat noted that the Global Chemicals Strategies working group met in April and had compiled a list of potential speakers to present at future CSF meetings. This would be shared with the Forum in follow up to the meeting and members invited to comment.

Annexes

Annex A: Attendance and apologies

Annex B: Presentation – Chemical pollution and the environment

Annex C: Presentation – UK Marine Strategy

Annex D: Presentation – Contaminants in the marine environment

Annex E: Presentation – Prioritisation and Early Warning System (PEWS) for chemicals of emerging concern

Annex F: EasyRetro board with noted group discussion points – Chemical pollution and the environment

Annex G: Presentation – Chemicals and UK water companies

Annex H: Presentation – Chemical Investigations Programme

Annex I: Presentation – UK Chemicals Strategy

Annex J: Presentation – Green Feedstocks working group

Annex K: Presentation – Essential Use working group

For accessibility reasons, Annexes B, C, D, E, F, G, H, I, J and K will not be made available on the UKCSF website. Copies can be obtained by contacting the Secretariat at Chemicals@defra.gov.uk

Annex A: Attendance and apologies

Attendees

Clara Ritch	3M
Tony Bingham	AGB Chemical Compliance
Colleen Paternoster	Anglian Water
William Beazley	BAE Systems
Emily Bradley	British Coatings Federation
Ciara Dempsey	British Coatings Federation
David Park	British Coatings Federation
Edwin Routledge	Brunel University London
Jamie Page	Cancer Prevention & Education Society
Jon Barber	Cefas
Tim Burrows	Charles River Laboratories Limited
Julie Schneider	CHEM Trust
Anna Watson	CHEM Trust
Clelia Oziel	Chemical Watch
Michael Cooper	Chemical Business Association
Roger Pullin	Chemical Industries Association
Lara Dickens	Chemservice UK Ltd
Cathy Monaghan	Cruelty Free International
Caroline Rainsford	CTPA
Florian Schulze	DAV Sektion Berlin
Rachel Salvidge	ENDS Report
Klaidas Kazak	EUK Consulting
Heather McFarlane	Fidra
Peter Fisk	Green Chemical Design Limited
Melissa Wang	Greenpeace

Nigel Haigh	Institute for European Environmental Policy
Alana Collis	Institution of Chemical Engineers
David Tyrer	Logika
Francesca Bevan	Marine Conservation Society
Sean Kelly	Nanotechnology Industries Association
Ian Axford	Office of the Government Chemist
Erik Prochazka	People for the Ethical Treatment of Animals (PETA) UK
Mike Rumboll	Portsmouth Water
Sue Bullock	Ramboll UK Limited
Steve George	REACHLaw UK Ltd
Phil Rowley	Retired
Graham Pattle	Ricardo Energy & Environment
Ricky Dunn	Risk & Policy Analysts Ltd
Helen Middleton	Rolls-Royce
Marlen Moreno	Rolls-Royce
Camilla Alexander-White	Royal Society of Chemistry
Jenny Lovell	Royal Society of Chemistry
Sian Farrar	Severn Trent
David Bott	Society of Chemical Industry
Maxine Boersma	Society of Chemical Industry
Ian Summers	Thames Water
Philip Malpass	UK Cleaning Products Industry Association
Frank Aaskov	UK Steel
Arthur Thornton	UK Water Industry Research
Rachel Barker-Jones	United Utilities
Liz Morrison	United Utilities
Nicholas Bennett	University of Nottingham

Charlotte Owen	Water UK
David Taylor	WCA Ltd
Britt Hogan-Smith	Wessex Water
Hannah Conway	Wildlife & Countryside Link
Liz Nicol	Wood plc
William Wilson	Wyeside Consulting Ltd

Apologies

Adrian Simpson	British Retail Consortium
Peter Clark	Knowledge Transfer Network
Martyn Johnson	Engineering Construction Industry Training Board

Government officials

Kiaora Tolmie	BEIS	Linsey Urquhart	BEIS
Caroline Barry	DAERA	Dawn Lynch	DAERA
Janet Sheridan	DAERA	Beverley Adeboye	Defra
Ahamad Akbor	Defra	Roxanne Appleyard	Defra
Daisy Barbour	Defra	Antoaneta Bilyanska	Defra
Mags Bradley	Defra	Owen Brady	Defra
Jack Brown	Defra	Kris Carr	Defra
Wassim Choudhury	Defra	Ruth Coward	Defra
Fraser Dick	Defra	Stephanie Firth	Defra
Max Folkett	Defra	Melanie Foster	Defra
Brad Harrison	Defra	Georgia Heritage	Defra
Saynab Ibrahim	Defra	Frederick Ironside	Defra
Terry Jones	Defra	Robert Jones	Defra
James Kearney	Defra	Edward Latter	Defra

Liz Lawton	Defra	Michael Lockhart	Defra
Hermione Mackelworth	Defra	Lewis Manuel	Defra
David Matz	Defra	Ruth Michael	Defra
Steve Morris	Defra	Fatima Nasser	Defra
Natasha Pourkarimi	Defra	Gershwinder Rai	Defra
Andrew Scarsbrook	Defra	Hasmitta Stewart	Defra
Charles Stubington	Defra	Julia Sussams	Defra
Connor Taylor	Defra	Chris Thorn	Defra
Mary Tomlinson	Defra	Alun Williams	Defra
Roger Hoare	EA	Richard Hawkins	EA
Alison Miles	EA	Tom Nickson	EA
Kerry Sims	EA	Rebecca Skinner	EA
Rosie Brian	HSE	Stavros Georgiou	HSE
Jill Wakefield	HSE	Lois Ward	NIEA
Miriam Jacobs	PHE	Helen Nakeeb	PHE
Rosemary Greenhill	Scottish Gov	Phil Leeks	Scottish Gov
Dan Merckel	Scottish Gov	Peter Reid	Scottish Gov
Anne Saunders	Scottish Gov	Geraint Hamer	Welsh Gov
Martin McVay	Welsh Gov	James Delaney	Welsh Gov
Adriana Kiss	Welsh Gov	Eloise Procter	Welsh Gov