

Minutes of 89th UK Chemical Stakeholder Forum (UKCSF) meeting, 17 October 2023, Hybrid Conference

1. Chair's welcome

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

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 for the 88th CSF July meeting (UKCSF/23/08) were approved following comments raised by attendees to the Secretariat.

2. CSF membership and steering group refresh

The CSF Secretariat reminded attendees of the ongoing process for refreshing the CSF Steering Group. Two new members were announced as part of the second iteration of the Steering Group refresh. The British Coatings Federation and the Knowledge Transfer Network would succeed the British Chemicals Association and the Society for Chemical Industry. The next iteration of replacing two more members would take place ahead of the next CSF meeting.

The CSF Secretariat also informed attendees that the Department for the Environment, Food and Rural Affairs (Defra) had ceased engagement with Greenpeace, therefore they had been removed as member of the CSF until further notice. The CSF Steering Group had agreed to nominate a new non-governmental organisation (NGO) member to replace Greenpeace on a temporary basis and maintain the balance of the CSF membership. Defra appointed the Marine Conservation Society as a CSF member to this effect.

There were no questions raised.

3. Circularity and decarbonisation of the chemicals value chain

Dr Geoff Brighty, Head of Sustainability at Mura Technology, presented on 'Circularity and decarbonisation of the chemicals value chain'. Read Annex B.

A participant asked about the process around feedstock in its last days, considering it is likely several chemicals will be mixed. The presenter replied that the material being used is post-consumer flexible packaging. They try to exclude other types of plastics such as PVCs, which comes to the company who have their own detection system, which can be

used to try to limit the chloride intake coming in. This will be in some of the packaging, such as meat packaging, but the water-based process should wash considerable amounts of this out.

Another participant asked whether the presenter is in dialogue with regulators to try and make this process simpler. The presenter said they have been dealing with things on a transactional basis, currently volumes are relatively low, but it's certainly something to keep watch of.

Another participant raised that there has been confusion around the phrase 'chemical recycling' as this refers to the recycling of plastics by chemical means rather than mechanical means. This was noted by the group.

A participant asked about any other global partners working on this, and whether they are also focused on post-consumer flexible plastics or whether they are looking at one of the other sorts of plastic inputs. The presenter answered that everyone seems to be focused on post-consumer waste plastics, and their view was that plants will be hypothecated on a particular feedstock with an end use in mind.

4. Sustainable Polymers and the Circular Economy

Prof. Matthew Davidson, Director of the Institute for Sustainability at the University of Bath, presented on 'Sustainable Polymers and the Circular Economy'. Read Annex C.

A participant asked a question about sugar feedstock, and the lifecycle analysis from this due to the big challenge around this stock coming from, for example, corn, causing unnecessary damage to trees. The presenter mentioned that the global warming potential is a lot lower than with fossil-based polymers but the second generation of these will be looking at waste agricultural products and prevention from these.

5. Circularity, demand reduction, and alternative feedstocks

Dr Liam Hardy, Policy Analyst at Green Alliance, presented on 'Circularity, demand reduction, and alternative feedstocks: Critical components of a green chemical industry'. Read Annex D.

A participant noted that regarding the waste hierarchy, there is little difference between chemical and mechanical recycling and that we need to find a best solution to this. The presenter noted the point and said that it's got to be addressed on a case-by-case basis as far as possible, but that the challenge is around optimising not just from carbon but also from resource, land use and energy.

A participant asked a question about the EU safe and sustainable design model, and where the UK is in comparison to this. Defra confirmed that work is taking place on this, through engaging with the concept internationally and specifically engaging on developing tools to support this concept and framework but this is still in the early stages of how this might work and look in the UK.

A participant asked whether if the opportunity for UK industry to become greener, faster, would our policy framework be ready for this. Responses indicated that this would be something that could be answered in the coming months.

6. Where Will We Get Our Future Carbon?

Dr Richard Miller, Consultant at Miller-Klein Associates Ltd, presented on 'Where Will We Get Our Future Carbon?'. Read Annex E.

A participant asked if there is much work going on with means of capturing ammonia that's coming off organic manures and so on that are causing problems. The presenter mentioned that the presentation is focused on ammonia used heavily for fertilisers and many parts of the chemicals sector. It's currently largely made by a process that involves production of a large amount of carbon dioxide, starting with natural gas and hydrogen stripped off to use that to make ammonia. There's a lot of interest on this not only as an ingredient and as an ingredient to go into chemical processing. One of the ways we will power long distance marine transportation and freight could be powered by ammonia as a fuel vector.

An attendee mentioned that one thing that is going to drive availability of carbon feedstock in future if we do what we have to is having 10Gt of CO₂ per year to bury, and asked if the presenter had thought much about how this is going to transform the availability of carbon in the chemical industry, assuming the small amount you need for industry of what we should be burying in order to stay in the safe space should be free? The presenter responded to say that there is a lot of interest in what everyone is doing here, in general the sector mentioned is a side show and parasitic on other parts of industry. Although volumes are big, because of the diversity we're unlikely to be driving anything. The presenter noted this was an interesting challenge in this transition stage.

7. Disrupting the circular economy

Dr Joanna Cloy, Senior Projects Manager at Fidra, presented on 'Disrupting the circular economy: Chemical flame retardants in furniture'. Read Annex F.

A participant mentioned that the worry around chemical disclosure and transparency is that it's unreliable, and it won't be there for products already sold and existing waste streams. They thought it would be better to focus on innovation and testing and the final point of recycling and waste handling and restrictions on use in the first place. The presenter understood these concerns, and all involved in the discussion agreed it is a topic that requires addressing whilst being sensitive to various concerns around costs and practicality.

8. Smarter Regulation

An Office for Product Safety and Standards (OPSS) official presented on 'Smarter Regulation: Fire safety of domestic upholstered furniture'. Read Annex G.

There were no questions.

9. Breakout group discussion

Defra presented questions for attendees to discuss in breakout groups, both in-person and using EasyRetro virtually. The discussion points from in-person discussions were added to the EasyRetro board. Read Annex H for the questions and noted discussion points. Following discussions, the Chair invited each group to present their key points in plenary.

10. UK REACH transitional registrations

A Defra official gave a verbal update on UK REACH transitional registrations.

Defra provided an update on the Alternative Transition Registration (ATR) model under UK REACH. The aim of the ATR is to reduce potential costs of bringing substances and registration into UK REACH whilst also ensuring we continue with a high level of protection of human and environmental health. As part of this work, Defra have been exploring ways of reducing the costs of hazard information, which is where most of the cost concerns are, as well as wanting to have a greater focus on the quality of information on use and exposure particularly in GB.

Defra have been working on this with Health and Safety Executive (HSE), the Environment Agency, NGOs and industry. There have also been consultants working to help work up possible models of what hazard information might look like, recognising there are several options. They have also been developing concepts on use and exposure information, looking at the ways to ensure information provided by information dossiers is fulfilling and enhancing the requirements of registration.

In terms of next steps, Defra published a statement on 9 November which outlined the plans for the ATR: [UK REACH: alternative transitional registration model \(ATRM\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statements/uk-reach-alternative-transitional-registration-model-atrm)

An attendee asked a question about how the ATR considers the transition from the linear to the circular economy. The presenter noted that for now we are focused on getting more information to consider this as information currently about how chemicals are used further down the supply chain currently isn't an area of much knowledge.

Attendees asked about the statement being published shortly and what level of detail this will include. Another attendee asked about the timeframes for consultations and legislation.

The presenter confirmed that that the impact statement will focus on setting out next steps and direction. They also confirmed that the second consultation will focus largely on installation, and the aim is for legislation to be brought in in the second half of 2024.

Another attendee asked about links to the circular economy, and the connection between what REACH is doing and how end of life materials are recycled to come back as a

chemical feedstock into the supply chain. The attendee and presenter agreed to take this conversation offline.

11. Chemical Compliance

An Environment Agency (EA) official, presented on 'Chemical Compliance'. Read Annex I.

An attendee asked what legal powers the EA exercise on the controls mentioned in the presentation. The presenter answered that this depends, if it relates to Persistent Organic Pollutants (PoPs), it's an offence under PoPs regulations to bring this to the market, and under REACH, but if it's cosmetics, this is trading standards responsibility. However, the imports of these products fall under mercury regulations which is the EA's responsibility.

12. CSF sub-groups and working groups

The Chair explained that there would not be updates from the Beyond-2020 sub-group and the PFAS working group, as they had not convened since the CSF July meeting.

Friends of the Strategy Working Group

Defra gave a verbal update on the Friends of the Strategy Working Group. They spoke to the note of the first meeting of the working group and the CSF policy update paper, shared in advance of the meeting.

A participant asked about the timeframes for publication of the chemicals strategy. The presenter confirmed that Defra are still working on publishing this year. Another participant also requested that, if the consultation is over the Christmas period, could it be extended to account for annual leave. It was also confirmed that once details around a consultation are confirmed, they will be shared with the group.

Another participant asked whether the strategy will include information to ensure all sources of chemical pollution are tackled together. The presenter confirmed that they are working on this basis, ensuring it is a cross-government approach and isn't siloed.

13. Policy update

a. Verbal updates

A HSE official gave a verbal update on regulation.

A HSE official updated on the lead ammunition workstream. HSE, with support from the Environment Agency, a final risk assessment opinion has recently been published following the six-month consultation earlier this year. There is also a 60-day public consultation on the socioeconomic opinion, which the presenter encouraged members of the group to contribute to if interested. This consultation will be reviewed by a challenge panel of experts from REACH Independent Scientific Expert Pool (RISEP), and HSE will send a final opinion to Defra's Secretary of State and the relevant Ministers from the Scottish and Welsh governments.

The RISEP list was published on the 12 October 2022. Following this, HSE recruited 36 experts to advise on the safety of chemical informing agencies and scientific opinion. In May this year, HSE opened up RISEP to new experts, with candidates being interviewed at the time of the meeting.

There are two additional live consultations. This includes draft recommendations for inclusion of substances in Annex 14 of UK REACH, open until the 18 December. Also, an ongoing call for evidence to support a substance evaluation for N-butylbenzenesulphonamide, open until 18 December 2023. Members of the group were encouraged to respond to these.

A Defra official gave a verbal update on UK REACH restriction prioritisation.

The presenter confirmed that, at the time of the meeting, Defra are awaiting the Secretary of State approval on the 2023 to 2024 REACH work programme, to be followed by sign off from Scottish and Welsh ministers.

The Defra team are considering the work programme for the next financial year. The presenter explained that next year's plan may be slightly different as there haven't been many additions to the EU registry of intentions, which did include one the team have completed regulatory management options analysis on which will be published soon.

The presenter encouraged any members of the group who have new evidence on substances that have been previously looked at to send this to the team by mid-November to help inform prioritisation for the 2024 to 2025 work programme.

There were no questions.

b. Q and A

The Chair invited questions and comments on the CSF policy update paper, shared in advance of the meeting, for which UK government officials were present to respond.

There were no questions or comments.

14. Any other business

The CSF Secretariat informed attendees that they would be taking maternity leave from November and introduced their maternity cover, who would be carrying on their responsibilities in their absence.

The Chair thanked Defra, the CSF Secretariat, all the presenters and everyone for attending. The next meeting would be held virtually in February 2024.

Annexes

Annex A: Attendance and apologies

Annex B: Circularity and decarbonisation of the chemicals value chain – Mura Technology

Annex C: Sustainable Polymers and the Circular Economy – University of Bath

Annex D: Circularity, demand reduction, and alternative feedstocks – Green Alliance

Annex E: Where Will We Get Our Future Carbon? – Miller-Klein Associates Ltd

Annex F: Disrupting the circular economy – Fidra

Annex G: Smarter Regulation – OPSS

Annex H: EasyRetro board: Circularity in Chemicals

Annex I: Chemical Compliance - EA

For accessibility reasons, Annexes B, C, D, E, F, G, H, and I will not be made available on the UKCSF website. Contact the Secretariat for a copy: Chemicals@defra.gov.uk.

Annex A: Attendance and apologies

Attendees

David Gurden-Williams, 3M UK PLCI

Tony Bingham, AGB Chemical Compliance

Steven Davis, BAE Systems PLC

Daphne Vlastari, BASF

Neil Christopher Hollis, BASF

John Reid, British Chemicals Association

David Park, British Coatings Federation

Patricia Durany-Fernandez, British Coatings Federation

Chloe Alexander, CHEM Trust

Ray Parmenter, Chartered Institute of Waste Management

Michael Squire, Chemical Industries Association

Kirsty Eley, Chemical Industries Association

Roger Pullin, Chemical Industries Association

Luke Buxton, Chemical Watch

Lara Dickens, Chemservice UK Ltd

Kate Shipton, Cruelty Free International

Caroline Rainsford, Cosmetic, Toiletry and Perfumery Association

Sean McPike, Eli Lilly

Shosha Adie, ENDS Report

Aaliyah Vayez, EUK Consulting

Catherine Gunby, Fidra

Joanna Cloy, Fidra

Libby Peake, Green Alliance

Liam Hardy, Green Alliance

James Okeefe, Independent

Ian Callan, Innospec Limited

Nigel Haigh, Institute of European Environmental Policy

Lisa Hipgrave, International Fragrance Association UK

Nissanka Rajapakse, Johnson Matthey

Dana Heldt, Knowledge Transfer Network

Ola Dosunmu, Lancaster University

Ian Axford, LGC Group

Katie Hobson, Logika Group

Erika Bonnegrace, L'Oreal

Richard Miller, Miller-Klein Associates Ltd

Sean Kelly, Nanotechnology Industries Association

Michael Shepherd, Non-Ferrous Alliance

Steven Whitehouse, Non-Ferrous Alliance

Geoff Brighty, Mura Technology

Mandy Veillette, PETA Science Consortium International

Steve George, REACHLaw

Izzi Monk, Royal Society of Chemistry

Rebecca Johansen, Ricardo Energy & Environment

David Carlander, RPA Ltd

Max La Vedrine, RPA Ltd

Michelle Bloor, Society of Environmental Toxicology and Chemistry UK

Emilio Lopez, Society of Motor Manufacturers and Traders

Hilda Akhiden, Solenis Netherlands BV

David Sowden, The Chemours Company

Rhona Savin, The Office for Environmental Protection

Chris Magee, Understanding Animal Research

Matthew Davidson, University of Bath

Philip Malpass, UK Cleaning Products Industry Association

Shiny Mathew, UKRI – Engineering and Physical Sciences Research Council

Peter Silverans, Venator

David Taylor, WCA Ltd

Hannah Blitzer, Wildlife and Countryside Link

Alan Ritchie, WSP Global Inc.

Harry Doyle, WSP Global Inc.

Kristina Flexman, WSP Global Inc.

Government officials

Dan Merckel, Scottish Gov

Phil Leeks, Scottish Gov

Caroline Barry, Department of Agriculture, Environment and Rural Affairs of Northern Ireland (DAERA)

Rhaine White, DAERA

Joanne Lymer, HM Revenue and Customs (HMRC)

Timothy Smith, HMRC

Mike Hill, Department for Business and Trade (DBT)

Sean Valoo, OPSS

Cecile Brich, Defra

Connor Emery, Defra

Ellen Ronn, Defra

Emma Barton, Defra

Isobel Coleman, Defra

Jack Brown, Defra

Jessica Creak, Defra

Jessica Evans, Defra

Keith Bailey, Defra

Lillian Koma, Defra

Mags Bradley, Defra

Maria Alemao, Defra

Mary Tomlinson, Defra

Matthew Lovatt, Defra

Melanie Foster, Defra

Max Folkett, Defra

Michael Lockhart, Defra

Paige Robinson, Defra

Ruth Hailay-Michael, Defra

Stephen Burrows, Defra

Suzanne Stafford, Defra

James Lymer, EA

Tom Nickson, EA

Richard Hawkins, EA

Alex Park, HSE

Bethan Taylor, HSE

Jill Wakefield, HSE

Dorothy Ubong, UK Health Security Agency (UKHSA)

Miriam Jacobs, UKHSA

Ovnair Sepai, UKHSA

Patrick Morgan, Natural England

Kate Cameron, Natural Resources Wales

Apologies

Mohamed Elkhalfa, British Plastics Federation

Nik Robinson, European Oilfield Speciality Chemicals Association UK

Steve George, MAKE UK

Francesca Bevan, Marine Conservation Society

David Bott, Society of Chemical Industry

Helen Sneddon, University of York