Minutes of 88th UK Chemical Stakeholder Forum meeting, 20 July 2023, Virtual Conference

1. Chair's welcome

The Chair welcomed all to the meeting. See 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 87th CSF February meeting (UKCSF/23/03) were approved following comments raised by attendees to the Secretariat.

2. CSF Membership & Steering Group refresh

The CSF Secretariat reminded attendees of a call for expressions of interest to join the CSF membership was held in March. Nine applications were received and carefully considered by Defra and three were accepted. The new members appointed by Defra were announced as, the Institute for Sustainability (University of Bath), the Society of Environmental Toxicology and Chemistry (UK Branch), and Fidra.

An additional two new members, that had succeeded existing CSF member organisations were also announced as, the Green Chemistry Centre of Excellence, which replaced the former Green Chemistry Network, and Wildlife and Countryside Link, which replaced Blueprint for Water. It was also announced that these two new members would succeed the Royal Society of Chemistry and CHEM Trust, as members of the CSF Steering Group, as part of the first iteration of the Steering Group refresh. The next iteration of replacing two more members would take place ahead of the next CSF meeting.

An attendee asked why other applications were rejected. The CSF Secretariat responded that one application did not fit the published criteria and other applications from NGOs and trade associations were not accepted as the aim of the CSF membership refresh was to fill any existing gaps. However, the latter applications would be held on record, should they need to be reconsidered in future.

Another attendee asked whether there were any remaining gaps in the CSF membership yet to be filled. The CSF Secretariat responded that there was a gap in representation for small and medium enterprises, and sustainable business.

3. What is UK-PARC?

UKHSA and Defra officials presented an introduction to UK-PARC (Partnership for the Assessment of Risks from Chemicals). See Annex B.

An attendee asked how civil society could get involved in UK-PARC and whether a summary report would be published. UKHSA responded that although they had held focus groups and outreach events, they were yet to setup ways for civil society to formally engage but, this was something they would like to do. They added that yes, there would be mid-review reports and summary reports published on the PARC website.

Another attendee highlighted that the European Chemicals Agency (ECHA) had launched three new Classification Labelling and Packaging (CLP) hazard classifications in April, which were not being implemented in the UK. They asked how the UK could be part of a joint transnational project, such as PARC, whilst diverging from action the EU is taking. UKHSA responded that they could not comment on the specific divergence issue raised. They noted that as the UK had left the EU, the issues of divergence and convergence would continue to arise. However, the UK still needed to be part of the scientific discussions, and should the UK wish to diverge, PARC was one way of developing evidence for those decisions.

The attendee also asked why industry was not included in the UK-PARC national hub, considering the larger laboratory budgets and capacity available to them when compared to Higher Education. Another attendee also asked about industry representation at a European level. UKHSA responded that industry was represented at a European level, as part of the PARC stakeholder forum, however, they were not involved in the science because PARC was a public partnership and there were rules about the integration of industry experts into the science. They added that there was potential to do things differently in the UK but, the partners who were included in the UK-PARC national hub were currently part of EU-PARC. However, they kept close dialogue with the stakeholder forum to gain views from industry.

UKHSA also noted that they would be drafting a report looking at how to take forward validation and test method needs in PARC. They had discussed with the management board, opportunities that could be developed, for industry members with laboratories, for example, to participate in some of the validations that were under the auspices of the OECD. This would be in collaboration with PARC, and the priorities for these were being worked out with the aim of getting agreement in the autumn.

An attendee highlighted the importance of using the existing data from ECHA's website, particularly on phthalates, adding that there was a lot of data on authorization applications, which included exposure monitoring and biomonitoring.

4. Wastewater-based Epidemiology

Prof. Barbara Kasprzyk-Hordern, of the University of Bath, presented their UK-PARC project on 'Wastewater-based epidemiology (WBE) for environmental and public health assessment'. See Annex C.

An attendee noted that they were a member of the UK REACH Independent Scientific Expert Pool (RISEP), and highlighted that the type of data presented, would not be included in the REACH authorization process as it stood, due to the way that the regulation was written. They asked how UK could take data from a project like PARC and make it live in regulation. The presenter responded that historically, WBE had been research focussed only but, they were now able to feed data into policy making. They believed that PARC could enable this in terms of testing more sites, making the tools more robust and validating all the approaches, to ensure that the data is of the right quality. They added that they were hopeful this data could be used an early warning system.

5. Occupational Exposure Surveys

Dr Craig Sams, of HSE, presented their UK-PARC project on 'Occupational Exposure Surveys'. See Annex D.

An attendee asked whether there were other sectors in addition to healthcare and waste management that were being considered in different countries for this research. The presenter responded that all PARC members would be focus on these two industry areas. They added that the power in the data would be in the large number of samples collated from several countries, including non-EU contributions.

The attendee also highlighted that typically with these types of occupational health studies, there were fewer samples collated from women, although they noted that there was a high proportion of women working in healthcare. They asked whether a significant proportion of women would be looked at for the waste management industry as, chemicals interact differently with women's bodies. The presenter responded that there was also a high proportion of women in the waste management sector, and one of the reasons for choosing this sector for research was because it was considered relatively new and not as heavily regulated in comparison to the chemicals sector.

6. Exposures from Plastics

Prof. Olwenn Martin, of University College London, and Dr Eleni Iacovidou, of Brunel University London, presented their UK-PARC project on 'Chemicals in Plastics'. See Annex E.

An attendee asked about further systematic evidence mapping. The presenters responded that this ongoing work was being looked at in the food packaging forum and the next step would be to consider evidence from biomonitoring studies, looking at which chemicals were measured in human samples and finally looking at evidence of health effects.

Another attendee asked about the use of artificial intelligence. The presenters responded that they used CADIMA, a screening tool which doesn't use machine learning but, there were others available which learn as one screens to reprioritise the literature and ensure that 95% is captured. They highlighted that they did not know of any tools for data extraction in systematic evidence mapping, and for this effort they had support from a software developer to use a semi-automated tool to recognise the names of some chemicals from a dictionary and extract these from papers into a platform to speed up the process. They added that they believed data extraction would be difficult to fully automate.

An attendee asked if the UK should adopt the updated regulation for recycled food contact materials, issued by the EU in 2022, with all the precautions needed to demonstrate safety. The presenters responded that in their view, global alignment was needed, as there was not the flexibility to allow different ways of approaching recycled content and using different materials, because of the way the market operated and to ensure traceability.

7. Law & Policy: Elements of PARC

Prof. Robert Lee, of the University of Birmingham, presented their UK-PARC project on 'Law & Policy: Elements of PARC'. See Annex F.

An attendee asked about social barriers. The presenter responded that reaching consensus and closure on issues was a social process. They had observed their scientific colleagues in their work, for example, hypothesizing over a coffee in a common room and reaching a negotiated position, or accommodating comments and adapting presentations for peer review in journals. They added that these barriers could have evidential weight within the regulatory processes.

8. Breakout group discussion

Defra presented questions for attendees to discuss, with their officials and UK-PARC presenters, in breakout groups, using EasyRetro virtually. See Annex G for the questions and noted discussion points.

9. CSF Sub- / Working group updates

a. Beyond 2020 (UN SAICM) Sub-group

Defra gave a verbal update on the Beyond 2020 CSF Sub-group.

A round of discussions of the Beyond 2020 framework was held in Nairobi in February. Significant progress was made in many areas such as governance or issues of concern. However, due to the scale of work and divergence of opinions, the work was postponed. The main issues that arose were around the proposed targets language and finance, including as relates to private sector involvement. The next round of negotiations would be held in Bonn in September, where the new instrument would be adopted.

Defra hoped to achieve an ambitious outcome for international chemicals management, and to be able to deliver against Ministerial aims to promote innovation and sustainability, with the opportunity to showcase UK business leadership and best practices. There would be a high-level segment with Ministers and CEOs of industry representatives invited.

The second negotiating meeting for the new Science Policy Panel for chemicals, waste and pollution would take place in December, and Defra were planning for a Minister to attend. The meeting would cover the operating principles for the Panel, continued discussion on the scope of the Panel, and processes to involve stakeholders in creation of assessments. Defra would look to discuss the latter issue, while accounting for different interests, with the Beyond-2020 CSF sub-group.

An attendee asked whether the UK should be considering the 19 issues of concern that pose risks to human health and the environment, that had been highlighted following UNEA 5.7, focussing on those which may be relevant domestically. Defra responded that the UK did take part in these discussions and were engaging in related processes. They added that they were interested in areas that could be useful for further assessments under the new Science Policy Panel.

Another attendee asked about what could be considered as a conflict of interest. Defra responded that they wanted to have access to the best possible data to feed into assessments that the Panel would produce, and this data often sits with industry. Therefore, there is a need to encourage the utilisation of industry data industry scientists in that process without breaching confidentiality of information and minimizing influence of vested interests.

b. 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, shared in advance of the meeting.

There were no questions raised by attendees.

10. Per- and Polyfluoroalkyl Substances (PFAS) update

a. PFAS Regulatory management option analysis (RMOA)

b. PFAS CSF Working Group

Defra presented a briefing on the PFAS Regulatory management option analysis. See Annex H.

Defra then gave a verbal update on the PFAS CSF working group. The working group had its third meeting the week prior to the July CSF meeting and was well attended by a range of stakeholders. The HSE and EA gave a joint detailed and technical presentation on the PFAS RMOA. The Royal Society of Chemistry also presented their policy position on PFAS in drinking water. Defra thanked all the participants for their contributions and for making the process valuable. The next working group meeting would be scheduled for the Autumn.

The working group had been focussing on three main areas including, the common barriers and challenges of moving away from PFAS, the policy options available to government to accelerate leadership by industry users in moving away from PFAS and to address the most critical risks of specific PFAS; and, how government can support innovation for cost-effective alternatives to PFAS. Working group members had developed papers on these three areas and Defra had collated these ahead of the last meeting for discussion. They have asked members for feedback on an emerging list of possible policy options and questions on how to develop these in more detail. Defra would then look to present this output in a form that can be shared with the CSF.

An attendee highlighted that they were aware of work at the Food Standards Agency (FSA), looking at migration of PFAS into food from food packaging and food contact materials, and asked how the environmental impacts of food packaging, particularly compostables, would be considered alongside issues of human health. Defra responded that the RMOA had considered different regulations, including those from both an environmental and a human health perspective. They continued that they had worked with the FSA to consider potential risks, including that from food packaging, from both human health and environmental aspects. The next step was to consider what other risks there were, that wouldn’t be covered by these existing regulations and what regulatory tools were available to reduce these risks.

Another attendee asked if there were any timelines for the PFAS RMOA recommendations to be taken forward. Defra responded that the HSE were in the process of planning the work on the fire-fighting foam restrictions. Stakeholder engagement began with the last meeting of the PFAS CSF working group, alongside discussions with key stakeholders to support the scoping of the restriction. More discussions were planned for the coming months.

11. Policy update

a. Verbal updates

The Cabinet Office gave a verbal update on the Retained EU Law (REUL) (Revocation and Reform) Act 2023.

They explained that the Act provided the vehicle for reforming and revoking retained EU law and towards the end of the Bill passage, they had published a schedule that listed regulations to be reformed or revoked through a series of statutory instruments (SIs), instead of the initially planned sunset of all REUL at the end of the year. They added that the sunset that would still apply in the UK at the end of the year was the interpretive effects of REUL. Departments were now using the powers of the Act to plan and prepare SIs, and many would launch consultations before these are laid. The Cabinet Office's role is to manage these processes through Parliament and ensure that there has been sufficient engagement.

An attendee asked whether any chemicals or REACH related REUL would be included in the next revocation list and would this be raised in good time before the SI is published. Defra responded that they would be looking out for any such REUL and would aim to inform stakeholders with as much advance notice as possible.

The attendee also asked whether there were any plans to reform REACH, given the construction of the respective powers of the REUL Act and the Environment Act. Defra responded if any reform was to take place, that the Environment Act powers were preferred as these were relatively broad, but had some constraints to them, including REACH specific aspects. However, they could not rule out using the REUL Act powers but, this would depend on the nature of the reform.

The attendee also asked how engagement on any reforms would take place. Defra responded that the government had committed to consulting on any significant reforms.

b. Q&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.

An attendee highlighted that post-EU exit trade international value was down around 15% on pre-EU exit levels, according to the Office for Budget Responsibility, and asked whether officials would commit to alignment on chemical regulation with the EU wherever possible to give industry the certainty it needs to improve international trade performance. Defra responded that they could not give such a commitment as this would not be in line with government policy. They added that Defra monitored action the EU was taking and considered the EU position but, the reality of the UK having left the EU meant that decisions needed to be made domestically based on domestic evidence.

Another attendee noted the UK REACH SI which had come into force extending the registration deadlines to October 2026, 2028 & 2030 and asked whether there was a timeline by which what data was to be submitted by those deadlines would be decided. Defra responded that they were working with stakeholders to develop an alternative registration approach for transitional registrations under UK REACH. They expected to be able to

consult on a more detailed proposal later this year. This would then be followed by the necessary legislation to give effect to the changes.

An attendee asked whether the new hazard classifications to be introduced under EU CLP in 2024, that do not form part of UK REACH, would be recognised under UK REACH as part of the light touch notification process of chemicals originating in Northern Ireland and passing into Great Britain. Defra responded that these would be recognised and there would not be any changes to substances that were already subject to these notifications.

12. AOB

Defra raised an AOB requesting information from attendees to help inform their contribution to OECD's eChemPortal. According to OECD's website visitor statistics, the UK was one of the top 10 users in 2020 & 2021, but Defra had limited information on who these users are or what they use eChemPortal for. Defra had designed a short survey to gather information on eChemPortal use in the UK and would share this in follow-up of the July CSF meeting.

The Royal Society of Chemistry raised an AOB informing the CSF of their latest work on Polymers in Liquid Formulations, which was launched the day prior to the July CSF meeting. A multi-stakeholder group had been involved in this work and a report had been published on their website, which would be shared in follow-up of the July CSF meeting.

The Chair thanked Defra, all the presenters and everyone for attending. The next meeting would be held virtually on Tuesday 17 October 2023.

Annexes

Annex A: Attendance and apologies

Annex B: UK-PARC Introduction - UKHSA & Defra

Annex C: Wastewater-based Epidemiology - Barbara Kasprzyk-Horden (Bath)

Annex D: Occupational Exposure Surveys - Craig Sams (HSE)

Annex E: Chemicals in Plastics - Olwenn Martin (UCL) & Eleni Iacovidou (BUL)

Annex F: Law & Policy: Elements of PARC - Robert Lee (UOB)

Annex G: EasyRetro board: The Rotterdam Convention

Annex H: PFAS RMOA Briefing - Defra

For accessibility reasons, Annexes B, C, D, E, F, G and H 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

David Gurden-Williams	3M UK PLC
Tony Bingham	AGB Chemical Compliance
Clare Evans	Augean PLC
Steven Davis	BAE Systems PLC
Daphne Vlastari	BASF
Neil Christopher Hollis	BASF
Rebecca Lentini	Beryllium Science and Technology Association
Caroline Raine	British Adhesives & Sealants Association
Tom Parker	British Chamber of Commerce EU & Belgium
John Reid	British Chemicals Association
David Park	British Coatings Federation
Kathryn Tearle	British Coatings Federation
Mohamed Elkhalifa	British Plastics Federation
Eleni Iacovidou	Brunel University London
Elisabeth Laird	Burson Cohn & Wolfe
Anna Watson	CHEM Trust
Chloe Alexander	CHEM Trust
Chloe Topping	CHEM Trust
Elaine McGavin	Chemical Business Association
Kirsty Eley	Chemical Industries Association
Lara Dickens	Chemservice UK Ltd
Matt Endean	CLEAPSS
Samantha Saunders	Cruelty Free International
Caroline Rainsford	CTPA
Shosha Adie	ENDS Report
Nik Robinson	European Oilfield Speciality Chemicals Association (UK)
Aaliyah Vayez	EUK Consulting
Nora Debraise	ExxonMobil
Catherine Gunby	Fidra

Heather McFarlane	Fidra
Peter Fisk	Green Chemical Design Ltd
Melissa Wang	Greenpeace
James Okeefe	Independent
Chris Howick	INOVYN INEOS
Ian Callan	Innospec Limited
Nissanka Rajapakse	Johnson Matthey
Ola Dosunmu	Lancaster University
Ian Axford	LGC Group
Katie Hobson	Logika Group
Liz Nicol	Logika Group
Sean Kelly	Nanotechnology Industries Association
Michael Shepherd	Non-Ferrous Alliance
Tess Renahan	PETA Science Consortium International
Steve George	REACHLaw
Adrian Hanrahan	Robinson Brothers Ltd
Camilla Alexander-White	Royal Society of Chemistry
Stephanie Metzger	Royal Society of Chemistry
Max La Vedrine	RPA Ltd
Michelle Bloor	Society of Environmental Toxicology and Chemistry (UK)
David Bott	Society of Chemical Industry
Emilio Lopez	Society of Motor Manufacturers and Traders
Hilda Akhideno	Solenis Netherlands BV
Rhona Savin	The Office for Environmental Protection
Naheed Rehman	Tronox
David Wright	UK Lubricants Association Ltd
Chris Magee	Understanding Animal Research
Olwenn Martin	University College London
Barbara Kasprzyk-Hordern	University of Bath
Robert Lee	University of Birmingham
Lowenna Jones	University of Sheffield

Helen Sneddon	University of York
David Taylor	WCA Ltd
Mick Goodwin	WSP Global Inc.
Natalie Sims	WSP Global Inc.

Government Officials

Phil Leeks	Scottish Gov	Martin McVay	Welsh Gov
Aoibhinn Corrigan	DAERA	Caroline Barry	DAERA
Siobhan Fitzpatrick	DAERA	Emma Cotterill	Cabinet Office
Mike Hill	DBT	Anna Ostrowska	Defra
Cecile Brich	Defra	Connor Emery	Defra
Edward Latter	Defra	Ellie Bates	Defra
Francis Wragg	Defra	Gabrielle Edwards	Defra
Jack Brown	Defra	Jessica Creak	Defra
Jessica Evans	Defra	Keith Bailey	Defra
Lillian Koma	Defra	Liz Lawton	Defra
Mags Bradley	Defra	Mark Chandler	Defra
Mary Tomlinson	Defra	Melanie Foster	Defra
Michael Lockhart	Defra	Philip Douglas	Defra
Ruth Hailay-Michael	Defra	Ruth Waite	Defra
Stephen Burrows	Defra	Steve Morris	Defra
Steve Dungey	EA	Tom Nickson	EA
Abi Williams	HSE	Alex Park	HSE
Bethan Taylor	HSE	Carrie Forshaw-Hollis	HSE
Craig Sams	HSE	Dave Adams	HSE
Dipti Kerai	HSE	Jill Wakefield	HSE
Dorothy Ubong	UKHSA	Helen Nakeeb	UKHSA
Miriam Jacobs	UKHSA	Ovnair Sepai	UKHSA
Patrick Morgan	Natural England		
Kate Cameron	Natural Resources Wales		

Apologies

Helen Lynn	Alliance for Cancer Prevention
Ray Parmenter	Chartered Institute of Waste Management
Roger Pullin	Chemical Industries Association
Peter Wragg	Flame Retardant Textiles Network Ltd
Nigel Haigh	Institute of European Environmental Policy
Hannah Blitzer	Wildlife & Countryside Link