Chemicals policy and regulation update

Index

1. Broad policy issues 1
1.1. Chemicals Strategy 1
1.2. Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS) 1
2. Update from Devolved Governments 3
2.1. Scotland 3
2.2. Wales 3
2.3. Northern Ireland 3
3. UK REACH – Update from DEFRA 5
3.1. Transitional registrations 5
3.2. Decision-making on Applications for Authorisation 5
3.3. UK REACH Work Programme 5
3.4. Intentionally added microplastics 6
4. UK REACH – Update from the UK Agency: Health and Safety Executive (HSE) 7
4.1. UK REACH Independent Scientific Expert Pool (RISEP) 7
4.2. UK Agency Accredited Stakeholders 7
4.3. UK REACH Evaluation Activity 7
4.4. HSE Public Consultations 7
4.5. UK REACH Restrictions Update 8
5. International Chemicals: Multilateral Environmental Agreements 9
5.1. Basel Convention – Control of Transboundary Movements of Hazardous Wastes and their Disposal 9
5.2. Rotterdam Convention – Prior Informed Consent (PIC) 10
5.3. Stockholm Convention – Persistent Organic Pollutants (POPs) 11
5.4. Minamata Convention – Mercury 12
6. International Chemicals: Voluntary initiatives 14
6.1. The Global Framework on Chemicals (GFC) 14
6.2. Science-Policy Panel 14
6.3. Partnership for the Assessment of Risk from Chemicals (PARC) 15
7. OECD's Environment, Health, and Safety (EHS) Programme 16

1. Broad policy issues

1.1. Chemicals Strategy

The Government's 25 Year Environment Plan committed to a new strategy to tackle chemicals of concern and help ensure the levels of harmful chemicals entering the environment are significantly reduced. The commitment to publish a Chemicals Strategy was reiterated in the Environmental Improvement Plan. We will provide more information on our way forward in due course. No timeline for this work has yet been decided, but we will keep the UKCSF updated on next steps.

'Friends of the Strategy' (FotS) CSF Working Group

In 2023, we established the 'Friends of the Strategy' (FotS) CSF Working Group to act as an advisory group on the development of a Chemicals Strategy. Through this group, we are testing and seeking feedback on emerging policy thinking. We have held two Working Group meetings so far and are planning a third meeting. No date for this has yet been set.

The Strategy mailbox: Chemicals.Strategy@defra.gov.uk.

1.2. Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS)

PFAS CSF Working Group

To inform our policy development on PFAS, Defra have convened the PFAS CSF Working Group. The group gives NGOs, figures within industry that are involved with the use of PFAS and others, such as experts on innovation, an opportunity to share their knowledge and experiences of transitioning away from the use of PFAS. The aim of the group is to have a set of policy options that we can take forward for further consideration and analysis.

The group have developed short initial policy papers that articulated:

- The common barriers and challenges of moving away from PFAS e.g., demonstration that alternative PFAS products provide the required performance level and meet standards,
- 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.

The initial papers have been collated to produce a single document. The paper was reviewed at the meeting in December 2023. The working group are still working together on this paper as the proposed output from the working group. Progress is being made but further work is required to ensure the paper appropriately balances differing views in the group. The final product will contribute to the development of PFAS policy in the future. Further discussion is

also required to agree the future format that stakeholder engagement will take beyond this working group.

For any further information regarding the PFAS CSF working group, please contact: Fredric.Barratt@defra.gov.uk.

UK REACH restriction

Defra has formally commissioned HSE to begin the development of the UK REACH restriction process for PFAS in fire-fighting foams. HSE will launch an initial call for evidence to inform this work and publish a dossier of recommendations within 12 months.

2. Update from Devolved Governments

2.1. Scotland

In September 2023, the Scottish Government updated its Tackling the Nature Emergency - Scottish biodiversity strategy to 2045 taking into account responses to the consultation on the draft strategy in 2022.

Scottish Chemical Policy Network (SCPN)

Officials have held two SCPN meetings over the previous six months. The first was a hybrid meeting at Scottish Government offices in Leith, Edinburgh on 1st September, and the second was online on 7th February.

The meeting on 1st September was well attended, and participants enjoyed an excellent presentation from Scottish ENGO Fidra, on their work on flame retardants in mattresses, and their work related to the current UKG consultation on the future of regulation of domestic upholstered furniture fire safety regulations. Scottish Government officials then hosted a short workshop on network members' views on topics and deliverables that are important for the Chemicals Strategy, following on from the workshops that Defra held last summer.

The following meeting on 7th February was also well attended. The presentations, on Identifying Threats to the Planetary Boundary for Biodiversity from Chemical Pollution (Environment and Climate Change Canada) and on EA Chemical Compliance: "The Good, the Bad and the Mercury" (Environment Agency), were both well received.

Anyone interested in participating in the SCPN, with any topics they wish to present to the Scottish Government should contact chemicals@gov.scot.

2.2. Wales

The Environment (Air Quality and Soundscapes) (Wales) Act 2024 received Royal Assent on 14th February 2024 and the current focus is on implementation.

The Act builds on our commitments in the Clean Air Plan for Wales; Healthy Air, Healthy Wales, enhances existing legislation and will deliver air quality improvements in Wales. This will improve the quality of our air environment and reduce the impacts of air and noise pollution on human health, biodiversity, the natural environment and our economy.

2.3. Northern Ireland

Clean Air Strategy

DAERA continues to develop Northern Ireland's first Clean Air Strategy. A synopsis of consultation responses to the Clean Air Strategy Discussion Document was published in June 2022 and a cross Departmental stakeholder group, the Clean Air Strategy Inter Departmental Steering Group, has been established to further develop the scope of the strategy and specific

actions. A public consultation on the draft Northern Ireland Clean Air Strategy will require approval from the NI Executive to proceed".

Environmental Improvement Plan (formerly Environment Strategy)

Once published, the Environmental Improvement Plan (EIP) for NI will be a main component of Green Growth. The EIP will provide the focus for protecting and enhancing our natural environment for the coming decades. The former DAERA Minister approved the finalised draft Strategy and made an Oral Statement to the NI Assembly in March 2022; however, the final version cannot be published without Executive approval. The current DAERA Minister intends to take the draft EIP to the Executive for consideration in March 2024.

Return of Stormont

Devolved Government has been restored at Stormont. As a result of The Windsor Framework, which aligns NI with EU legislation, including for chemicals, The Stormont Brake mechanism may be used.

The Stormont Brake is a mechanism that gives the Northern Ireland assembly the power to object to changes to EU rules that apply in Northern Ireland. It was agreed as part of the Windsor Framework, the UK–EU agreement that changed the Ireland/Northern Ireland protocol.

3. UK REACH – Update from DEFRA

3.1. Transitional registrations

Following a public consultation last year, the government has legislated to extend the submission deadlines for transitional registrations to 2026, 2028 and 2030 depending on tonnage and hazard profile. This is to allow time to develop an alternative model for transitional registration (ATRm) and pass the necessary legislation if the decision is made to proceed. It is also necessary to allow industry time to comply with any new arrangements. We aim to consult on detailed proposals on the ATRm in the coming months.

3.2. Decision-making on Applications for Authorisation

Defra has received final opinions on **23** UK authorisation applications from the UK Agency. Defra's Secretary of State has made decisions to grant authorisation on four of these applications and will make a decision on whether to grant the remaining applications in 2024. Consent from Scottish and Welsh ministers is required for decisions where the matter relates to areas of devolved competence. Details of the decisions made to date are available on GOV.UK.

3.3. UK REACH Work Programme

Since UK REACH came into force, the Work Programme has prioritised the issues that are most effectively addressed through UK REACH, and where action would have the greatest impact for human health and the environment.

The UK REACH Work Programme 2023-24 was published in February 2024, accompanied by an updated rationale, setting out how we identified priorities for the financial year.

The following 5 priorities for the UK REACH Work Programme 2023-24 were identified:

- Per- and polyfluoroalkyl substances (PFAS) – (a) start preparing a restriction dossier on PFAS in fire-fighting foams (FFFs); and (b) assess potential additional restrictions on further wide dispersive uses of PFAS and PFAS likely to be released from consumer articles.
- Formaldehyde and formaldehyde releasers in articles – continue the RMOA initiated under the 2022 to 2023 work programme.
- Bisphenols in thermal paper – continue the RMOA initiated under the 2022 to 2023 work programme.
- Hazardous flame retardants – further develop the risk assessment on flame retardants and consider the recommendations on completion.
- Intentionally added microplastics – monitor progress of the evidence project initiated and commissioned under the 2022 to 2023 work programme.

We have received HSE's final opinions on the proposed restriction on tattoo inks and permanent make-up. We are assessing the proposal, and a decision will follow in due course.

We have received HSE's recommendations to add DCHP, disodium octaborate and DIHxP to the Authorisation List (Annex 14). We are assessing these recommendations, and decisions will follow in due course.

Defra, Welsh, and Scottish governments are working with the HSE, Environment Agency, and other stakeholders to identify priorities for the UK REACH Work Programme in 2024-25. Further to the recommendations of the Regulatory Management Option Analysis (RMOA) on PFAS published in April last year, we propose to prioritise the development of restriction proposals on PFAS.

3.4. Intentionally added microplastics

Under the 2022-23 UK REACH Work Programme, Defra initiated a research project investigating the risks of intentionally added microplastics.

This evidence project is reviewing microplastics emissions, and the risks they pose both to human health and the environment, as well as undertaking a socio-economic assessment. It will advise on the most effective measures to address any risks in the short to medium term and help identify wider evidence gaps that need to be addressed in the longer term to support a more strategic approach to managing intentionally added microplastics in the UK.

This project is expected to report in early 2025. Defra and the Welsh and Scottish Governments will consider its recommendations once complete.

4. UK REACH – Update from the UK Agency: Health and Safety Executive (HSE)

4.1. UK REACH Independent Scientific Expert Pool (RISEP)

In May 2023, HSE opened their Independent Scientific Expert Pool (RISEP) to new experts, this was communicated via an e-Bulletin on 25th May 2023. We had a good response and, after sifting applications and conducting interviews, we are currently inducting 18 new experts into the process now (with one to follow in the summer).

A short biography of the new experts will be made available shortly on the HSE website here UK REACH: Current members of REACH Independent Scientific Expert Pool (RISEP) (hse.gov.uk) alongside the current experts we have in place.

4.2. UK Agency Accredited Stakeholders

Since April 2021, stakeholders have been invited to apply for Accredited Stakeholder Organisation (ASO) status. HSE has recruited **58 ASOs** from industry and NGOs. The accredited stakeholders have been able to attend all formal meetings of RISEP and any relevant challenge panels to date. There is no closing date for the ASO process and stakeholders can apply at any time. Details on how to apply can be found on the Get involved in UK REACH page.

4.3. UK REACH Evaluation Activity

HSE has an obligation to report annually on the activity undertaken to evaluate registration dossiers and substances, this is described in Article 54 of UK REACH. The Article 54 report for 2023 can be found on HSE's website. The report also directs registrants to the recommendations to registrants which aim to improve the quality of future registrations.

4.4. HSE Public Consultations

HSE has received a number of applications for the authorisation of substances under UK REACH. These substances include:

- 4-Nonylphenol, branched and linear, ethoxylated (NPE)
- 4-(1,1,3,3-Tetramethylbutyl) phenol, ethoxylated (OPE)

View the consultations here.

HSE has announced public consultations for each of these applications. Details can be viewed on the HSE consultation webpages. Any third parties with information on alternatives are strongly encouraged to share any relevant information.

Scientific and technical information on possible alternatives or technologies should be **submitted to HSE by 2nd May 2024.**

4.5. UK REACH Restrictions Update

Lead in Ammunition

HSE has assessed the risks to human health and the environment from lead in ammunition and published its final risk assessment opinion.

HSE, as the Agency for UK REACH, with support from the Environment Agency, continues this work, which included a six-month public consultation in 2022, and more recently, a 60-day public consultation (that closed on 10th December 2023) on the socioeconomic impact of the restriction proposals.

HSE received 8,159 responses to the latest consultation (and by way of a comparison, the EU received only 175 comments when they undertook a similar exercise). An extension to the restriction process will be announced in due course to provide HSE and the Environment Agency more time to fully consider the responses and form the final opinion.

After analysing the responses to the latest consultation, comments will be taken account of, where appropriate, when drafting the final socioeconomic analysis opinion, seeking scrutiny and challenge from independent experts on the REACH Independent Scientific Expert Panel. Alternatives to lead ammunition will also be considered as part of HSE's wider technical and socioeconomic assessment. HSE expects the final report to be completed later this year. This will include:

- An updated background document providing an overview of how HSE has used evidence to support the risk assessment and socioeconomic analysis, which will also provide consideration that any proposals to manage the risk from the use in lead in ammunition would be practical, proportionate and enforceable and;
- A list of non-confidential submissions to the public consultation, alongside HSE's "response to comments from the public consultation" document.

The Agency will send its final consolidated opinion to the Appropriate Authorities i.e., the Defra Secretary of State and the Welsh and Scottish Governments. The final decision for any restriction will then be made by the Defra Secretary of State, with the consent of the Scottish and Welsh Ministers.

5. International Chemicals: Multilateral Environmental Agreements

The Triple Conference of the Parties (COP) to the Basel, Rotterdam, and Stockholm (BRS) Conventions took place, in Geneva, from 1-12 May 2023. Parties considered standard joint agenda items related to programmes of work and budgets and elections of officers, in addition to substantive agenda items related to the implementation of each individual convention.

5.1. Basel Convention – Control of Transboundary Movements of Hazardous Wastes and their Disposal

The overarching objective of the Basel Convention is to protect human health and the environment against the adverse effects of hazardous wastes. The Convention aims to control movements of hazardous waste between nations, prevent the transfer of hazardous and other problematic wastes from developed to less developed countries and protect human health and the environment from adverse effects from these wastes.

OECD Task Team on e-waste amendments

At the Basel Convention COP in 2022, it was agreed that **all** transboundary movement of waste electrical and electronic equipment (WEEE) would be subject to the Prior Informed Consent (PIC) procedure and therefore can only be exported if the destination country gives consent, starting from 1st January 2025. Decisions adopted under Basel are automatically incorporated into the OECD Council Decision on the Control of Transboundary Movements of Waste Destined for Recovery Operations unless an OECD Member objects within an agreed timeframe.

In August 2022, Japan objected to the automatic incorporation of the WEEE Amendment decision, thereby commencing OECD negotiations. Japan's argued that OECD countries have well-developed environmental controls, and applying the Basel amendments in full would slow down the intra-OECD circular economy regarding certain types of WEEE, particularly printed circuit boards (PCBs).

The UK position, alongside the majority of other OECD members, is that all hazardous WEEE, at a minimum, should be subject to PIC. The outcome of negotiations – which concluded in December 2023 – was that OECD members could not reach consensus on incorporating the WEEE Amendments into the OECD Decision. Text was agreed to this effect, which means that each OECD Member country will control all WEEE shipments in conformity with its domestic legislation and international law. The UK will implement the Basel WEEE amendments in full in our regulations for all transboundary movements of e-waste. It is strongly expected the EU, Switzerland, Norway, Canada and most other OECD countries will do the same.

Plastic Waste Exports

The UK Government is committed to ensuring that plastic waste is managed appropriately and recognises that some importing countries have difficulty in dealing with plastic waste. The Government is therefore committed to consulting on options to ban the export of plastic waste to countries which are not members of the Organisation for Economic Cooperation and Development (non-OECD countries) this year.

Please send any enquiries on plastic waste exports to: WasteMovements@defra.gov.uk.

Plastic Waste Treaty

The UK is a founding member of the High Ambition Coalition (HAC) to End Plastic Pollution, a group of over 60 countries calling for an ambitious global plastic pollution treaty to end plastic pollution by 2040. The aim is for the treaty to be agreed by the end of this year, with two more negotiating sessions remaining – the fourth one in Canada in April and the fifth in the Republic of Korea in November.

5.2. Rotterdam Convention – Prior Informed Consent (PIC)

The Rotterdam Convention creates legally binding obligations for the exchange of information between Parties when certain hazardous chemicals and pesticides are traded internationally. Any chemicals listed in Annex III of the Convention become subject to the Convention's Prior Informed Consent (PIC) procedure.

The Chemical Review Committee (CRC) 19

The nineteenth meeting of the Chemical Review Committee (CRC-19) of the Rotterdam Convention took place from 3-6 October 2023 in Rome, Italy. The CRC is the Rotterdam Convention's scientific body, which considers whether technical criteria set out in Annex II to the Convention has been met for the listing of certain substances.

The Committee adopted draft decision guidance documents for Methyl Bromide and Paraquat, which were recommended for listing under Annex III of the Convention at CRC-18 last year, and decided to forward them to the next meeting of the Conference of the Parties, together with a recommendation to list these chemicals in Annex III of the Convention.

Additionally, CRC 19 reviewed notifications of final regulatory actions for 9 substances: Bromacil, Carbaryl, Chlorfenvinphos, Chlorpyrifos, Diarsenic Pentaoxide, Ethion, Mercury, Methidathion, and Thiodicarb.

Having at least two notifications for chlorpyrifos and mercury from two different PIC regions meeting the criteria, the Committee recommended listing these two chemicals in Annex III of the Convention. Draft decision guidance documents for these chemicals will be developed in the intersessional period.

The review of notifications on carbaryl, chlorfenvinphos, ethion, methidathion and thiodicarb will continue at the twentieth meeting of the Committee (CRC 20).

5.3. Stockholm Convention – Persistent Organic Pollutants (POPs)

The UN Stockholm Convention on POPs agrees global prohibition of substances that fulfil the POPs criteria, including requiring all stockpiles and waste containing POPs to be identified and disposed of, so that the POPs are destroyed or irreversibly transformed.

Persistent Organic Pollutants Review Committee (POPRC) Meeting 19

The POPRC is the science-facing arm of the Stockholm Convention process and considers whether substances meet the technical criteria for listing as POP. The 19th POPRC meeting (POPRC.19) was held in Rome in 13-19 October 2023.

The three substances that were considered were long-chain perfluorocarboxylic acids (LC-PFCAs), chlorpyrifos, and the UK-led nomination ‘medium chain chlorinated paraffins’ (MCCPs), each following multiple previous rounds of evidence-gathering. MCCPs and LC-PFCAs were being considered at the risk management evaluation (RME) stage (socioeconomic considerations), but chlorpyrifos was again being considered at the risk profile stage (scientific criteria).

POPRC.19 agreed the UK-drafted RME for UK-nominated substance MCCPs. This is a significant milestone in the multi-year process for a substance to be adopted as a new POP and followed several rounds of information gathering and commenting from UK and global stakeholders, including industry as well as Convention Parties and Observers.

MCCPs will now be considered by the next COP, COP-12 in 2025, for addition to the Convention’s list of POPs for global elimination (with specific exemptions). UK are also leading the drafting of an addendum to the RME for consideration at the next POPRC, POPRC.20 in September 2024, to potentially help further strengthen the agreed recommendations that will go to COP-12 in 2025.

The RME for LC-PFCAs and the risk profile for Chlorpyrifos were also agreed at POPRC.19: LC-PFCAs will now also be recommended to COP.12 in 2025 for adoption as a new POP for global prohibition; and an RME for chlorpyrifos will be considered at the next POPRC meeting, for which intersessional work is ongoing ahead of POPRC-20 in 2024, including in the form of POPRC-led and Defra-led calls for information and comments on draft evaluation documents.

Other POPRC-19 topics included an introductory item on 'identifying POPs in stockpiles, products, and articles in use and in wastes, and issues related to the production, import and export of products and articles containing POPs’, for which follow-up intersessional work is ongoing ahead of POPRC-20 (in 2024) and COP-12 (in 2025), including in the form of POPRC-led calls for information.

Amendment of POPs Regulation

A recent Statutory Instrument (THE PERSISTENT ORGANIC POLLUTANTS (AMENDMENT) (NO. 2) REGULATIONS 2023) came into force in November 2023 to amend the assimilated POPs Regulation by adding a new POP substance perfluorohexane sulfonic acid (PFHxS), including its salts and related compounds, to a list of substances that are prohibited from use and manufacture in GB. This is in line with the United Kingdom's obligations under the Stockholm Convention, following the Convention's 2022 listing of this substance as a new POP for global elimination.

Further amendments to the POPs Regulation are under consideration for future legislative updates, including in response to a recent Defra-led consultation and to changes to the Stockholm Convention following the most recent COP in May 2023. A 2023 Defra-led consultation proposed a range of potential amendments to the technical annexes of the POPs Regulation; we expect a Government response to be published in the coming months, which will include our intended next steps.

We also held another 2023 consultation, jointly with WG, on proposals to amend the PCBs Regulations (England and Wales) to provide extra clarity and remove any potential ambiguity in the way that the Regulations are interpreted, so that UK stakeholders can continue to effectively manage with certainty any equipment containing PCBs in line with current legislation. The Government response published on the 6th of March 2024, includes our intended next steps to proceed with the proposed changes to the PCBs Regulations for England and Wales as set out in the consultation documents, when parliamentary time allows.

5.4. Minamata Convention – Mercury

The Minamata Convention is an international treaty designed to protect human health and the environment from anthropogenic emissions and releases of mercury and mercury compounds. The fifth meeting of the Conference of the Parties (COP-5) took place on 30 October-3 November 2023. COP-6 is expected to take place in November 2025.

The key outcomes from COP-5 were:

- Amendments to Parts I and II of Annex A on dental amalgam, fluorescent lighting, and cosmetics:
    - **Dental Amalgam** –The UK collaborated with other like-minded parties to agree to phase down the use of dental amalgam. Further discussions will take place on dental amalgam at the next COP in 2025. The Department of Health and Social Care are the government policy leads on dental amalgam.

    - **Fluorescent Lighting** – the UK worked collaboratively to adopt the decision to phase out certain types of fluorescent lighting with dates that are acceptable to the UK. Use of these products are already restricted or due to be restricted under UK regulations.

- **Cosmetics** - we supported the removal of the 1ppm mercury threshold on cosmetics (excluding some eye area products) in alignment with the UK Cosmetic Products Regulation.

- Mercury waste thresholds:
  - The UK helped achieve agreement on a 15mg/kg threshold value for waste contaminated with mercury. This has an important caveat that Parties may choose to use an alternative process if they have adequate environmentally sound waste management measures in place to protect human health and the environment. This will minimise impacts on domestic waste management practices.

6. International Chemicals: Voluntary initiatives

6.1. The Global Framework on Chemicals (GFC)

The *Global Framework on Chemicals for a Planet free from of Harm from Chemicals and Waste* (GFC), previously referred to as the Strategic Approach to International Chemicals Management (SAICM) (Beyond 2020), was successfully adopted at the Fifth Session of the International Conference on Chemicals Management (ICCM5) in Bonn, Germany, in September 2023.

Stakeholders including governments, industry, and NGOs, negotiated and adopted the new framework alongside "The Bonn Declaration" - an important high-level endorsement of the GFC agreed by ministers, heads of delegation, and stakeholder leaders.

The GFC attempts to address all aspects of the lifecycle of chemicals through a multi-stakeholder approach, where industry and private sectors are strategic actors to foster innovation, move towards sustainable business models and drive change. The framework includes measures such as preventing illegal trade and trafficking of chemicals and waste, implementing national legal frameworks, transitioning to safer alternatives, and enhancing transparency regarding chemicals and associated risks. Stakeholders have politically committed to achieve outcomes of the GFC by 2030/35.

Defra was heavily engaged with other government departments and stakeholders, including through the B2020 CSF sub-group, to develop UK positions ahead of negotiations and support the GFC's goals, while also showcasing the innovation coming out of the UK. The resulting agreed text has now been formally released by the Secretariat and can be viewed in-full online at www.chemicalsframework.org.

The UK is actively working with stakeholders on implementation of the framework and is looking forward to continuing its important work at the sixth international conference in 2026 (ICCM6).

6.2. Science-Policy Panel

The UK is a leading voice globally in the establishment of a new intergovernmental Science Policy Panel (SPP) for chemicals, waste and the prevention of pollution.

The panel will be of similar stature to the Intergovernmental Panel on Climate Change (IPCC) and the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) and will raise the profile of pollution to that of the other global environmental crises of climate change and biodiversity loss.

The second Open-Ended Working Group (OEWG2) on the SPP was held in Nairobi 11 – 15 December 2023. The UK was pleased to see good progress made on the development of institutional arrangements, a conflict-of-interest policy, and a comprehensive list of operating principles.

We plan to keep up momentum achieved at OEWG2 by continuing consultations with key stakeholders, the secretariat and Member states as we develop our position for OEWG3 in June 2024, to be held in Geneva.

6.3. Partnership for the Assessment of Risk from Chemicals (PARC)

PARC is a research and innovation programme under Horizon Europe to support EU and national risk assessment and risk management bodies with new data, knowledge, methods, networks, and skills to address current, emerging, and novel chemical safety challenges.

Work on PARC started in May 2022 and is ongoing. We have UK partners (from government and academia) who are active in all the work packages.

7. OECD's Environment, Health, and Safety (EHS) Programme

The Organisation for Economic Co-operation and Development's (OECD) EHS programme covers the safe use of chemicals, nanomaterials, pesticides, biocides, and products of modern biotechnology. It aims to protect health and the environment, while avoiding duplication of effort, ensuring that efficiencies are made and barriers to trade avoided. Defra continues to have oversight of the EHS programme, with UKHSA leading on human health, co-ordinating collective input from across UK government and external stakeholders.

The Working group of National Coordinators to the OECD Test Guideline programme (WNT) have conducted a survey and held a stakeholder workshop on operational and financial aspects of validation in December 2023. Once finalised, the recommendations from this workshop will inform the Test Guideline Programme going forward, including updating the guidance on Validation, in Guidance Document 34.

The UK led, OECD expert group on developing a testing strategy for non-genotoxic carcinogenicity, have published several critical NAMs reviews with recommendations for future specific validation activities to ensure a robust and globally acceptable approach.

The UK is co-leading a number of nanomaterials projects at the OECD, including toxicokinetics, and test method validation needs for nanomaterials in genotoxicity testing. The latter is currently in development.

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