



Department
for Environment
Food & Rural Affairs

UK Call for Comments on the POPRC Evaluation Documents 2023

Inviting comments on Risk Profile for Chlorpyrifos and
the Risk Management Evaluations for MCCPs and
LC-PFCAs

Date: March 2023

We are the Department for Environment, Food and Rural Affairs. We're responsible for improving and protecting the environment, growing the green economy, sustaining thriving rural communities and supporting our world-class food, farming and fishing industries.

We work closely with our 33 agencies and arm's length bodies on our ambition to make our air purer, our water cleaner, our land greener and our food more sustainable. Our mission is to restore and enhance the environment for the next generation, and to leave the environment in a better state than we found it.



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Any enquiries regarding this publication should be sent to us at

Consultation Coordinator, Defra
2nd Floor, Foss House, Kings Pool,
1-2 Peasholme Green, York, YO1 7PX

Or email: consultation.coordinator@defra.gov.uk

www.gov.uk/defra

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Part one: Introduction

The UK is a party to the Stockholm Convention on persistent organic pollutants (POPs), which are substances that persist in the environment, accumulate in living organisms and pose a risk to our health and the environment.

They can be transported by air, water or migratory species across international borders, reaching regions where they have never been produced or used.

Substances listed in the Convention are generally prohibited from production, use, or import/export unless specific exemptions apply or acceptable purposes have been agreed.

There is a process for parties to propose a substance for listing if they have gathered evidence that suggests it may be a POP. The POPs Review Committee (POPRC), the technical scientific committee of the Stockholm Convention, then considers and further develops the evidence that the substance demonstrates POP characteristics.

If there is evidence that it is a POP, they then consider the socio and economic impacts of a ban or restriction and make recommendations to the Stockholm Convention Conference of the Parties, which is held every 2 years.

Purpose of the consultation

The POPRC meets every year, and the next meeting is early October 2023. Between meetings there is a period of information gathering and rounds of commenting on the draft documents. Previously, in October 2022 we requested information to aid the drafting of the documents evaluated by the POPRC. This call for comments invites the public to provide comments on the second drafts of these documents.

Responses to this call for comments will be used to inform the UK's submission to the secretariat of the Stockholm Convention. Submissions to the Convention are published on the Convention's website. Additionally, responses to this call for comments will be published on government websites at www.gov.uk.

Responding to this consultation

Where possible, please respond to this call for comments online using the Citizen Space hub at Defra link

Where this is not possible, alternative options are provided below if required:

By email to: POPs@defra.gov.uk

By post to: Consultation Coordinator, Defra 2nd Floor, Foss House, Kings Pool, 1-2 Peasholme Green, York, YO1 7PX

Your response will be most useful if it is framed in direct response to the questions posed, though further comments and evidence are also welcome.

Duration

This consultation will run for 8 weeks. The consultation opened on 27 March 2023 and closes on 22 May 2023. Please note, any responses sent by post must arrive at the above address by the closing date of the consultation. Unfortunately, any responses received after this date will not be analysed. To ensure your response is included in the analysis, please consider responding online via Citizen Space.

For further information on how Defra collects, processes and stores our data, please see the consultation privacy notice, saved on Citizen Space.

What we will do after the consultation

Responses to this call for comments will be published and placed on government websites at www.gov.uk. The responses we receive will help inform the UK's full response to the Stockholm Convention. This full response will be published on the Stockholm Convention website.

The published responses will include a list of organisations that responded, but not personal names, addresses or other contact details. However, information provided in response to this consultation document, including personal information, may be subject to publication or release to other parties, or disclosure in accordance with access to information regimes, such as the Freedom of Information Act 2000 and the Data Protection Act 2018.

If you want information, including personal data that you provide to be treated as confidential, please say so clearly in writing when you send your response to the consultation (if responding via post or email) and explain why you need these details to be kept confidential. If responding via Citizen Space, you will be asked whether you would like your response to be treated as confidential or not. If we receive a request for a disclosure under the Freedom of Information Act 2000, we will take full account of your explanation, but due to the law we cannot provide any assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as a confidentiality request.

Defra is the data controller in respect of any personal data that you provide, and Defra's Personal Information Charter, which gives details of your rights in respect of the handling of personal data, can be found at

<https://www.gov.uk/government/organisations/department-for-environment-food-ruralaffairs/about/personal-information-charter>.

Confidentiality and data protection information

1. Responses to this consultation will be published on the Government website at www.gov.uk. An annex to the published responses will list all organisations that responded but will not include personal names, addresses or other contact details.

1.1 Defra may publish the content of your response to this consultation to make it available to the public without your personal name and private contact details (for example home address, email address, etc).

1.2 If you answer 'Yes' in response to the question asking if you would like anything in your response to be kept confidential, you are asked to state clearly what information you would like to be kept as confidential and explain your reasons for confidentiality. The reason for this is that information in responses to this consultation may be subject to release to the public or other parties in accordance with the access to information law (these are primarily the Environmental Information Regulations 2004 (EIRs), the Freedom of Information Act 2000 (FOIA) and the Data Protection Act 2018 (DPA)). We have obligations, mainly under the EIRs, FOIA and DPA, to disclose information to particular recipients or to the public in certain circumstances. In view of this, your explanation of your reasons for requesting confidentiality for all or part of your response would help us balance these obligations for disclosure against any obligation of confidentiality. If we receive a request for the information that you have provided in your response to this consultation, we will take full account of your reasons for requesting confidentiality of your response, but we cannot guarantee that confidentiality can be maintained in all circumstances.

1.3 If you answer 'No' in response to the question asking if you would like anything in your response to be kept confidential, we will be able to release the content of your response to the public, but we won't make your personal name and private contact details publicly available.

1.4 There may be occasions when Defra will share the information you provide in response to the consultation, including any personal data with external analysts. This is for the purposes of consultation response analysis and provision of a report of the summary of responses only.

1.5 This consultation is being conducted in line with the Cabinet Office "Consultation Principles" and be found at: <https://www.gov.uk/government/publications/consultation-principles-guidance>.

1.6 Please find our latest privacy notice uploaded as a related document alongside our consultation document.

1.7 If you have any comments or complaints about the consultation process, please address them to:

Consultation Coordinator, Defra

2nd Floor, Foss House, Kings Pool,
1-2 Peasholme Green, York, YO1 7PX

Or email: consultation.coordinator@defra.gov.uk

Part two: summary of call for comments

Chlorpyrifos

Chlorpyrifos is an organophosphate pesticide. It has been widely applied as an insecticide in agriculture and as a biocide to control non-agricultural pests. In 2008, chlorpyrifos products were authorised for use in more than 88 countries.

However, in 2008, usage as a biocide was phased-out in Europe, and in 2000 its use in most non-agricultural applications was phased out. However, usage as a biocide, for example, for termite control in buildings, is still practiced in other countries.

A Risk Profile for chlorpyrifos has been drafted to further elaborate on, and evaluate, information submitted in the original proposals that recommended that chlorpyrifos be listed as a POP. The Risk Profile sets out the evidence that this substance meets the criteria for a POP.

This draft Risk Profile was reviewed at the Eighteenth POPRC meeting (POPRC-18) in September 2022, but a final decision on it was deferred until the next POPRC meeting.

Further information was collected at the end of 2022, relating to the adverse effects resulting from long-range transport of chlorpyrifos. A revised draft Risk Profile has been made available, and is the document we are inviting comments on ahead the next POPRC meeting.

If the redrafted Risk Profile is agreed at the next POPRC meeting (October 2023), the proposal will move to the next stage: drafting of a Risk Management Evaluation (as specified in Annex F of the Stockholm Convention). There would then be a request for information focusing on socio-economic impacts.

Chlorinated paraffins with carbon chain lengths in the range C14 to C17 and chlorination levels at or exceeding 45 percent chlorine by weight

Chlorinated paraffins (CPs) are industrial chemicals, manufactured and used globally. They are substances consisting of predominantly linear chloroalkanes, with different

degrees of chlorination and chain length distributions depending on application and feedstock.

This proposal is for any CP product that has constituents with carbon chain lengths of 14 to 17 atoms (C14 to C17) and a chlorination level at or exceeding 45 percent chlorine by weight.

These congeners are the principal constituents of substances called 'medium-chain chlorinated paraffins' (MCCPs) in Europe, North America and Australia, and major constituents of several products manufactured in Asia (for example, CP-52).

MCCPs have wide dispersive uses including in flexible PVC products, adhesives, sealants and precision metal working fluids.

The UK proposed MCCPs for listing as a POP under the Stockholm Convention and has led the review process for it. In September 2022, the POPRC agreed the Risk Profile (as specified in Annex E of the Stockholm Convention) for MCCPs, moving to the next stage: preparing the Risk Management Evaluation (as specified in Annex F of the Stockholm Convention). The Risk Management Evaluation will provide information on the social and economic impacts of any control measures under consideration.

The UK contracted an external contractor to gather relevant information and draft the Risk Management Evaluation for MCCPs ahead of the next POPRC meeting (October 2023). Information relating to socio-economic impacts of a global restriction of MCCPs was requested and collected at the end of 2022, and a draft Risk Management Evaluation has been made available and is the document we are inviting comments on ahead the next POPRC meeting.

Long-chain perfluorocarboxylic acids (PFCAs), their salts and related compounds

Long-chain perfluorocarboxylic acids (PFCAs), their salts and related compounds are members of the per- and polyfluoroalkyl substances (PFAS) chemical class. Long-chain PFCAs, with carbon chain lengths from 9 to 21, and their salts, are infrequently used in products.

However, there are reported limited uses including surfactant application and the production of fluoropolymers, and related compounds have been used in a range of applications, including in coating products, fabric and carpet protectors, textile impregnation agents and firefighting foams.

PFCAs with carbon chain lengths from 9 to 14, their salts and/or related compounds, may also be unintentionally produced during the manufacturing of PFAS, including those containing a carbon chain of less than nine carbon atoms, and in other industrial processes.

As a result, long-chain PFCAs may be present in certain products and articles as impurities.

In September 2022, the POPRC agreed the Risk Profile (as specified in Annex E of the Stockholm Convention) for long-chain PFCAs, moving to the next stage: preparing the Risk Management Evaluation (as specified in Annex F of the Stockholm Convention). The Risk Management Evaluation will provide information on the social and economic impacts of any control measures under consideration.

Information relating to socio-economic impacts of a global restriction of long-chain PFCAs was requested and collected at the end of 2022, and a draft Risk Management Evaluation has been made available and is the document we are inviting comments on ahead the next POPRC meeting (October 2023).

Confidentiality and some details about you

1. **Would you like your response to be confidential?**
 - a. **Yes**
 - b. **No**
2. **If you answered yes to question 1, please give your reason**
3. **What is your name?**
4. **What is your email address? If you enter your email address, then you will automatically receive an acknowledgement email when you submit your response.**
5. **Are you responding as an individual or on behalf of an organisation?**
 - a. **Individual**
 - b. **Organisation**
6. **What type of organisation are you responding on behalf of?**
 - a. **A government body**
 - b. **Non-governmental organisation (NGO)**
 - c. **Local authority**
 - d. **Charity**
 - e. **Consultancy**
 - f. **Small or micro business (Less than 50 employees, including global operations)**
 - g. **Medium business (50 – 249 employees, including global operations)**
 - h. **Large business (250 or more employees, including global operations)**
 - i. **Industry association**
 - j. **Other (please specify)**
7. **If you are responding on behalf of an organisation, what is the name of the organisation?**
8. **Where in the UK are you/your organisation based and/or in operation? (tick all that apply)**
 - a. **England**
 - b. **Wales**

- c. **Scotland**
- d. **Northern Ireland**
- e. **Outside the UK (EU)**
- f. **Outside the UK (non-EU)**
- g. **Other please specify)**

Consultation Questions

9. Please use this space to provide any comments on document 1 (draft RP on Chlorpyrifos). If you have specific comments on the text, please provide section and paragraph numbers
10. Please use this space to provide any comments on document 2 (draft RME on MCCPs). If you have specific comments on the text, please provide section and paragraph numbers
11. Please use this space to provide any comments on document 3 (draft RME on Long-chain PFCAs). If you have specific comments on the text, please provide section and paragraph numbers