Department
for Environment
Food & Rural Affairs

# Consultation on potential amendments to the Persistent Organic Pollutants (POPs) Regulation 2026

Date: 18 March 2026

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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consultation.coordinator@defra.gov.uk

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# Part One – Introduction

This consultation seeks views on proposed changes to the assimilated Regulation (EU) 2019/1021 of the European Parliament and of the Council of 20 June 2019 on Persistent Organic Pollutants (recast), as amended by:

- The Persistent Organic Pollutants (Amendment) (EU Exit) Regulations 2020/1358;
- The Persistent Organic Pollutants (Amendment) (EU Exit) Regulations 2022/1293;
- The Persistent Organic Pollutants (Amendment) Regulations 2023/729;
- The Persistent Organic Pollutants (Amendment) (No.2) Regulations 2023/1217;
- The Persistent Organic Pollutants (Amendment) Regulations 2025/296;
- The Persistent Organic Pollutants (Amendment) (No.2) Regulations 2025/297;
- The Persistent Organic Pollutants (Amendment) (No.3) Regulations 2025/605;

(known together as “the assimilated POPs Regulation”).

Responses to this consultation will be used to inform decisions on amendments to the assimilated POPs Regulation. We have drafted a new piece of legislation to show how we propose to amend the current assimilated POPs Regulation. We will consider all responses to this consultation that are submitted by the closing date. Please use this opportunity to share your views and identify any evidence and information that may help us determine the potential impacts of these proposals within the draft legislation and as detailed in this consultation document.

Some proposals in this consultation set out our provisional positions, which we will refine as part of consideration of any evidence submitted through this consultation. Other proposals seek to generate additional evidence to inform future policy development and proposals and assess their suitability for achieving UK priorities.

It is worth noting that any upcoming or future legislative changes that we implement into the assimilated POPs Regulation will depend on multiple factors, including:

- Available evidence from a range of sources, including responses to this consultation but also other evidence acquired through additional research and engagement routes.
- The need to protect human health and the environment.
- The potential impacts on businesses, the voluntary sector and the public sector.
- Global context, including international conventions, guidelines, and decisions, such as those of the Stockholm Convention, as well as regulatory decisions made in other trusted jurisdictions.
- Scientific and technical progress.
- Other UK and Defra priorities and commitments, such as those set out in the Environment Improvement Plan (EIP) 2025.

No single factor in isolation is likely to determine final legislative changes that we implement into the assimilated POPs Regulation.

# Context

The United Kingdom is a Party to the Stockholm Convention, a global treaty which lists chemical substances known as POPs. POPs have four main criteria: they are persistent, toxic, bio-accumulative, and they have the potential for environmental transport far away from sources of emissions, including across international borders. Parties to the Convention can, by consensus, agree to add a chemical substance to the list of POPs. The Stockholm Convention aims to protect human health and the environment by prohibiting, eliminating or restricting the global production and use of POPs.

As a Party to the Stockholm Convention, the UK has an obligation to implement amendments to the Convention through its own domestic legislation, but it is also able to contribute to technical discussions and decision-making processes that help determine how the Convention text is amended. During these processes, the UK will consider where there is sufficient evidence or uncertainty as to the potential impacts of proposed amendments on the UK and its priorities. However, in general, Parties to the Convention work together towards a common objective of protecting human health and the environment from POPs. It is possible for Parties to the Convention to go further and faster in their implementation of this objective than the Convention might require at that time, such as through more stringent restrictions for a given POP, where there are good reasons and sufficient evidence to do so.

In Great Britain, the assimilated POPs Regulation regulates the production, placing on the market, and use of POPs which are banned or restricted under the Stockholm Convention. In some specific cases there are time-limited exemptions or derogations listed in the Stockholm Convention – and the assimilated POPs Regulation – which allow the use of certain POPs in specific circumstances.

To facilitate its dual market access to both the UK Internal Market and the EU's Single Market, the EU POPs Regulation applies in Northern Ireland under the terms of the Windsor Framework. As a result, the Government pays close attention to equivalent EU legislative changes, in order to uphold the Government's commitment to protect the UK internal market, as well as to ensure the smooth flow of goods into Northern Ireland as well as the European market.

Under Article 3 of the Stockholm Convention, Parties must also regulate the import and export of POPs. In Great Britain (GB) this requirement is in part met through the Prior Informed Consent (PIC) regime which regulates the export of hazardous chemicals. This is administered by the Health and Safety Executive (HSE). Part 4 of the GB PIC list lists POPs substances which are subject to an export ban. The HSE are responsible for updating this list following new additions to the Annexes of the Stockholm Convention and any relevant changes to UK regulations. The outcome of this consultation, and the subsequent amendments to the assimilated POPs Regulation, will be reflected where relevant, in the GB PIC list by HSE, including implementing export prohibitions on substances added to Annex I of the assimilated POPs Regulation.

The UK also has obligations under the Convention relating to management of waste contaminated by or containing POPs, which are met through Article 7 and Annexes IV and

V of the assimilated POPs Regulation. Annexes IV and V were last updated in April 2025. This consultation is specific to proposed amendments to Annex I of the assimilated POPs Regulation, which covers the prohibition of production, use, and placing on the market of POPs. This consultation does not propose changes to Annexes IV or V. Future policy or legislative developments regarding POPs waste management, including possible amendments to Annexes IV or V, may be subject to further consultation or targeted stakeholder engagement by Defra, the Devolved Governments, and competent authorities.

## Links to the Government's Environmental Improvement Plan (EIP)

In December 2025, Defra published a revised Environmental Improvement Plan (EIP), outlining a strategic framework for improving England's natural environment up to 2043 and including new interim targets for existing statutory Environment Act 2021 targets. In meeting Goal 4 to minimise environmental risks from chemicals, the EIP includes commitments and related actions that link to the proposed POPs prohibitions detailed in the accompanying draft statutory instrument (SI).

Defra committed to *'*Implement targets and obligations agreed through multilateral environmental agreements and other forums*',* with linked actions including 'implementing updates to the Stockholm Convention on POPs, through legislation to be made in accordance with the deadlines expected to be set by the convention in late 2025'. The proposed legislation in the accompanying draft SI will implement these updates, and the Convention implementation deadlines have now been set as 16 December 2026.

The EIP2025 reiterated that managing exposure to chemicals and pesticides requires global solutions and international cooperation. We remain committed to our obligations under internationally agreed, multilateral environmental agreements and, as a global scientific leader on chemicals management, we will continue to use science, diplomacy and expertise to influence global environment policy. This has been shown through our leadership on MCCPs, with the UK nominating this substance (in April 2021) for global elimination under the Stockholm Convention and continuing to play a leading role in subsequent work to support the Persistent Organic Pollutants Review Committee (POPRC) in evaluating this substance prior to final Convention agreement (in May 2025). Through our proposed legislation, we now seek to deliver domestic implementation of this global agreement, for MCCPs and four other newly adopted POPs.

The EIP2025 also highlighted the Government's intention to reduce complexity for businesses, remove trade barriers, and provide the certainty that industry needs to grow and invest – while continuing to protect communities and the environment – in part by drawing on regulatory decision making in other trusted jurisdictions to enable new protections that can be applied faster, more efficiently, and in a way that is more aligned with our closest trading partners. For example, the EIP2025 committed to reform UK Registration, Evaluation, Authorisation, and Restriction of Chemicals (REACH), by December 2028, to enable protections that address chemical pollution to be applied more quickly, efficiently and in a way that is more aligned with our closest trading partners,

especially the EU. This EIP commitment was made in light of the New Approach to Ensure Regulators and Regulation Support Growth, published by Government on 17 March 2025.

Legislation and policy relating to amending the assimilated POPs Regulation are informed by a range of factors, including our international obligations under the Stockholm Convention. These obligations are shared by other Parties to the Convention, including the EU, and will also inform those Parties' implementation of equivalent domestic controls to their POPs legislation. These Parties, including the EU, are largely expected to introduce equivalent domestic controls in broad alignment with our proposed prohibitions, due to the equivalent obligations on all Parties to the Stockholm Convention.

When determining how to implement our international obligations under the Stockholm Convention, we have considered how to ensure there is less uncertainty and complexity when trading with our closest trading partners, including the EU: accordingly, we have sought to outline in this consultation where there are equivalent amendments to the EU POPs Regulation that have either been proposed or already entered into force.

The EIP2025 also referred to per- and polyfluoroalkyl substances (PFAS) – sometimes referred to as 'forever chemicals' – and committed to delivery of a PFAS Plan in 2026. There are some overlaps with PFAS and POPs: some PFAS are POPs, but not all; some POPs are PFAS, but not all. The assimilated POPs Regulation already prohibits 3 key PFAS-POPs (PFOS, PFOA and PFHxS), including additional related substances. The proposed amendments in the draft SI, which accompanies this consultation, will newly prohibit another group of PFAS-POPs (including related substances) and will lower a threshold for an already-listed PFAS-POP. This consultation does not refer to any PFAS which have not yet been agreed to be listed as POPs under the Stockholm Convention. Those PFAS will be subject to other policy development, including in light of the government's PFAS Plan.

Additionally, the EIP2025 included 2 further commitments with links to POPs: to 'Substantially increase the destruction of POPs found in waste by 2030' and to 'Seek to eliminate the use of PCBs in equipment by the end of 2025 to make sure there are negligible emissions to the environment in line with our commitments under the Stockholm Convention.' These are longstanding commitments for which considerable action has already been taken: EIP2025 highlights remaining actions to be taken, but this consultation and the accompanying draft SI does not have any direct relevance to these commitments.

## Purpose of the consultation

The purpose of this consultation is to seek views on government proposals and policy options to amend the assimilated POPs Regulation in upcoming and future legislation. Most of these proposals relate to recent additions of new POPs to the list of prohibited substances under the Stockholm Convention. Although Parties to the Convention can opt out of such amendments, the UK has a long-standing policy of implementing agreed international commitments on chemicals, and we are therefore consulting on how these new listings should be implemented in Great Britain (GB).

This consultation also provides an opportunity for respondents to share evidence regarding related amendments adopted or proposed by the EU, including their potential suitability for GB and any implications for the functioning of the UK internal market.

The primary focus of this consultation is to inform how these obligations should be implemented in GB, including the identification of appropriate specific use exemptions and unintentional trace contaminant (UTC) limits.

We are also seeking evidence on recent or proposed amendments to the EU POPs Regulation, including their potential suitability for GB and any implications for the functioning of the UK internal market, particularly where different requirements may apply in Northern Ireland under the Windsor Framework.

Most of the consultation refers to proposals reflected in an accompanying draft statutory instrument (SI). These proposals relate to:

- Adding to Annex I of the assimilated POPs Regulation the 5 newest POPs substances agreed to be listed for global prohibition under the Stockholm Convention:
  - Medium-chain chlorinated paraffins (MCCPs)
  - Long-chain perfluorocarboxylic acids (LC-PFCAs)
  - UV-328
  - Dechlorane Plus
  - Chlorpyrifos

  along with unintentional trace contaminant (UTC) limits and specific use exemptions from the prohibition of these substances.

- Amending the existing PFOS entry in Annex I of the assimilated POPs Regulation to lower the unintentional trace contaminant (UTC) limits and to remove an outdated reference.

Beyond those proposals included in the accompanying draft SI, we also provide opportunities for respondents to present evidence on potential implications of recent amendments to the EU POPs Regulation with respect to UTC limits for another group of POPs called polybrominated diphenyl ethers (PBDEs). Finally, we also provide an opportunity to comment on the Stockholm Convention POPs Review Committee (POPRC)'s evaluation processes, evidence generation, and engagement regarding substances that are being considered as potential new POPs.

## Devolved Governments

The UK government departments and Devolved Governments with an implementation and / or enforcement role for the Stockholm Convention include Department for Environment, Food and Rural Affairs (Defra), Scottish Government, Welsh Government, and Northern Ireland Department of Agriculture, Environment and Rural Affairs (DAERA).

In England, Wales, Scotland and Northern Ireland the responsibility for enforcing environmental chemicals legislation primarily rests with the following bodies, known as the

Competent Authorities: in England, The Environment Agency (EA); in Scotland, The Scottish Environment Protection Agency (SEPA); in Wales, Natural Resources Wales (NRW); and in Northern Ireland, Northern Ireland Environment Agency (NIEA) (an executive agency of DAERA NI).

There are also a number of other UK departments and agencies with specific responsibilities for the management of chemicals, including the Health and Safety Executive (HSE), Food Standards Agency (FSA) for England, Wales and Northern Ireland and Food Standards Scotland, Centre for Environment, Fisheries and Aquaculture Science (Cefas), and the UK Health Security Agency (UKHSA).

While the assimilated POPs Regulation includes some elements that apply to all nations of the UK (England, Wales, Scotland and Northern Ireland), this consultation refers only to potential amendments to Annex I of the assimilated POPs Regulation and the corresponding updates to the GB Prior Informed Consent (PIC) list: these would not have any direct application to Northern Ireland.

The legislative power to amend Annex I to the assimilated POPs Regulation in response to amendments to the Stockholm Convention, or in response to scientific and technical progress, sits with Defra's Secretary of State (for England), Welsh Ministers (for Wales) and Scottish Ministers (for Scotland), though the Secretary of State may exercise these functions on behalf of a Devolved Government (such as Wales and / or Scotland) with their consent. In contrast, for Northern Ireland, the power to make such amendments remains with the European Commission following EU Exit.

The current intent is that the amendments and proposals detailed within this consultation will be applied to England, Wales and Scotland, though this would require formal consent to be given by Welsh Government and Scottish Government Ministers to legislate on their behalf. Such formal consent will not be sought until analysis of the consultation findings has been completed, though the Scottish and Welsh Governments have both been consulted in the preparation, and have agreed to the publication, of this consultation.

## Who should respond to this consultation

This consultation is open to responses from any individual or organisation with an interest in these proposals or wider policy relating to POPs.

Stakeholders in the following sectors may be particularly interested in, or impacted by the content of the consultation, including the accompanying draft SI:

- Manufacturers, users, importers and exporters of the following substances, including any product, recyclate, component or subcomponent containing or contaminated by them:
    - MCCPs (plasticiser and flame retardant)
    - LC-PFCAs (a group of PFAS), including salts and related compounds
    - Chlorpyrifos (pesticide)

    - UV-328 (UV stabiliser),
    - Dechlorane Plus (a chlorinated flame retardant),

- Manufacturers, users, importers and exporters of the following already prohibited POPs substances, including any product, recyclate, component or sub-component containing or contaminated by them:
    - PFOS (a PFAS), including related compounds
    - PBDEs (brominated flame retardants)

- Numerous specific sectors or applications, including, but not limited to, the following:
    - Adhesives and sealants
    - Aerospace and defence
    - Agriculture, pest control, or both
    - Analytical instruments
    - Automobiles
    - Chemicals
    - Construction and demolition
    - Industrial machinery and other combustion engine industries
    - Medical technology
    - Metal working fluids
    - Outdoor power equipment
    - Packaging
    - Paints and coatings
    - Plastics, polymers and rubber materials
    - Polyvinyl chloride
    - Recycling
    - Semiconductors
    - Textiles
    - Wiring and cables

## How to respond to this consultation

Where possible, please respond to this consultation online using Defra's Citizen Space consultation hub. Where this is not possible, alternative options can be provided if required, by emailing: consultation.coordinator@defra.gov.uk.

Respondents are not required to answer every section of this consultation. Please only complete the sections that you would like to contribute to, leaving all other sections blank. This approach should be applied whether responding via the online Citizen Space survey, or by email or post.

Defra is managing the consultation process on behalf of the UK, Scottish Government and Welsh Government.

If you would like to send a copy of your consultation response to the Scottish or Welsh Governments directly, then please send to the following addresses:

- Wales (Cymru): to respond if you are based in Wales you can email chemicalscemegion@gov.wales
- Scotland: to respond if you are based in Scotland you can email chemicals@gov.scot

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 18 March 2026 and closes on 13 May 2026. 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 with this consultation.

## What we will do after the consultation

A summary of the responses to this consultation will be published and placed on the UK Government website at www.gov.uk, and will be linked on the GOV.UK POPs Collection Page at https://www.gov.uk/government/collections/persistent-organic-pollutants-pops and may also be published on the government websites for Wales and Scotland at www.gov.wales, and www.gov.scot.

The summary 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.

Please find our latest privacy notice uploaded to Citizen Space as a related document alongside our consultation document.

If you have any comments or complaints about the consultation process, please address them to: consultation.coordinator@defra.gov.uk

# Part Two - overview of consultation policy areas

**Summary**

This consultation covers several proposed amendments to the assimilated POPs Regulation, as detailed in the accompanying draft legislation. It seeks views on:

Proposed amendments to add 5 new POP substances to Annex I of the assimilated POPs Regulation: MCCPs, LCPFCAs, Chlorpyrifos, UV328 and Dechlorane Plus. For each substance, the consultation sets out proposed prohibitions, time-limited specific use exemptions, and proposed unintentional trace contaminant (UTC) limits. This reflects recent decisions under the Stockholm Convention.

Proposed amendments to the current Annex I entry for the existing POP (PFOS), including reductions to UTC limits and the removal of an outdated reference, to reflect scientific and technical progress, consistent with recent changes introduced in the EU.

Policy considerations beyond the draft Statutory Instrument (SI):

- Seeking information regarding potential implications of recent EU Amendments to UTC limits for existing POPs (polybrominated diphenyl ethers, PBDEs), including the effects of these amended limits applying in Northern Ireland, views on the suitability of similar measures for Great Britain, and the impacts of differing requirements between Great Britain and Northern Ireland.
- Seeking views on information generation and engagement on substances nominated as potential new POPs, including opportunities to provide evidence on information generation and stakeholder engagement for substances being evaluated as potential new POPs under the Stockholm Convention.

It also asks for any other comments or evidence, relating to the content of the consultation, the SI, or Annex I of the assimilated POPs Regulation.

**Using and sharing your information**

How we use your personal data is set out in the consultation and call for evidence exercise privacy notice which can be found here: https://www.gov.uk/government/publications/defras-consultations-and-call-for-evidence-exercises-privacy-notice

**Other Information**

This consultation is being conducted in line with the Cabinet Office “Consultation Principles” and be found at: Microsoft Word - Consultation Principles (1).docx

# Part Three – Policy options and consultation questions

## Confidentiality and some details about you

1. Would you like your response to be confidential?
    a. Yes
    b. No

    If you answered yes, please give your reason.

2. What is your name?

3. What is your email address? If you enter your email address, then you will automatically receive an acknowledgement email when you submit your response.

4. Are you responding as an individual or on behalf of an organisation?
    a. Individual
    b. Organisation

5. 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)
    k. Not applicable, I am responding as an individual

6. If you are responding on behalf of an organisation, what is the name of the organisation?

7. Where are you or your organisation based?
    a. England
    b. Wales
    c. Scotland
    d. Northern Ireland
    e. Outside the UK (EU)
    f. Outside the UK (non-EU)
    g. Other (please specify)

8. Where is your organisation in operation? (please 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)
    h. Not applicable, I am responding as an individual

# Proposed amendments to add five new POP substances - Overview

The UK is a Party to the Stockholm Convention, a global treaty that seeks to eliminate or restrict Persistent Organic Pollutants (POPs) because of their harmful effects on human health and the environment. POPs are persistent, bio-accumulative, toxic, and capable of long-range environmental transport. At recent Conferences of the Parties (COP), five substances were agreed for global prohibition under Annex A of the Convention:

- Medium-chain chlorinated paraffins (MCCPs)
- Long-chain perfluorocarboxylic acids (LC-PFCAs)
- Chlorpyrifos
- UV-328
- Dechlorane Plus

As a Party to the Convention, the UK must implement these decisions through domestic legislation. This consultation seeks views on proposals to add these substances to Annex I of the assimilated UK POPs Regulation, alongside:

- Time-limited specific-use exemptions where available under the Convention, to allow critical sectors time to transition to safer alternatives.
- Unintentional Trace Contaminant (UTC) limits, which define the maximum concentration at which a POP can be unintentionally but lawfully present in substances, mixtures, or articles.

Specific-use exemptions apply only to defined activities and are time-limited. We propose to include all exemptions available under the Convention for MCCPs, LC-PFCAs, UV-328, and Dechlorane Plus. No exemptions are proposed for chlorpyrifos, as evidence indicates it has not been supplied or used in the UK as a plant protection product since 2020.

UTC limits provide clarity for industry and align with the UK's obligations under the Convention. If a UTC limit is set, substances or articles containing concentrations above that limit are unlawful. If no UTC limit is set, then *any* detectable presence of that substance is prohibited. We propose introducing UTC limits for all 5 substances. These limits are not dictated by the Stockholm Convention.

This consultation invites views on:

- The proposed prohibitions and their specific use exemptions
- Evidence on on-going uses and supply chain dependencies
- Availability and readiness of alternatives, and expected transition times.
- Appropriate UTC limits for each substance

The intended timeline for implementation is by 16 December 2026, when the Convention amendments for MCCPs, LC-PFCAs, and chlorpyrifos enter into force. UV-328 and Dechlorane Plus were agreed earlier but have not yet been added to UK law due in part to

continued engagement with industry to understand potential impacts and to consider necessary exemptions.

In addition to the substance-specific exemptions and UTC limits proposed in this consultation, it is important to note that Article 4 of the assimilated POPs Regulation includes several general exemptions from control measures that apply across all substances listed in Annex I. These include, for example, use for laboratory-scale research or as a reference standard, and the continued use of articles that were already in use at the point a prohibition enters into force.

These general provisions will also apply to the 5 substances covered by this consultation once they are added to Annex I. They are set out in the existing Regulation, cannot be amended on a substance-by-substance basis, and are therefore not in scope of this consultation.

Prohibiting these POPs will reduce long-term risks to health and the environment, including less contamination of ecosystems and food chains, and will help avoid future waste management and remediation costs. While phase-out may involve transitional costs for businesses — such as reformulation and supply chain adjustments — these impacts will be mitigated through exemptions and clear thresholds.

## Adding new POPs – medium-chain chlorinated paraffins (MCCPs)

### Substance information

| Substance | Date of implementation under the Stockholm Convention | Examples of known historical uses, either in the UK, globally or both | Potentially relevant sectors (non-exhaustive), UK and globally | Example CAS numbers |
|---|---|---|---|---|
| medium-chain chlorinated paraffins (MCCPs) | 16 December 2026 | Multiple uses, including plasticiser and flame retardant in PVC products and adhesives, sealants, rubbers, coatings, and as an additive in metal-working fluids | Numerous, including medical, non-food packaging, construction, aerospace, defence, metalworking, automotive. | 85535-85-9; 198840-65-2; 1372804-76-6; and others |

Medium-chain chlorinated paraffins (MCCPs) are chlorinated paraffins with carbon chain lengths in the range C14–C17 and chlorination levels at or exceeding 45 per cent chlorine by weight. These substances are called MCCPs in Europe, North America and Australia, and are major components of several products manufactured in Asia (for example CP-52).

MCCPs have some links to short-chain chlorinated paraffins (SCCPs), which are already prohibited in our assimilated POPs Regulation, and under the Stockholm Convention.

Evaluation dossiers drafted by POPRC, the technical committee for the Stockholm Convention, include the following information about MCCPs.

The main uses of MCCPs globally are as a secondary plasticiser, flame retardant and viscosity modifier, as an adhesion promoter in polyvinyl chloride (PVC), and as extreme pressure additives in metal-working fluids (MWFs). They are also used as additives for paints, adhesives, sealants, rubbers and other polymerics. In addition, recycled PVC materials containing MCCPs can be used to produce a range of products, for example ‘street furniture’ (for example, traffic cones and roadside barriers).

Chlorinated paraffins constitute a large group of chemicals with different degrees of chlorination and chain length distributions depending on the application and feedstock. Due to the variation of levels of chlorination and positions of the chlorine atoms on the carbon

chain, the $C_{14–17}$ 'medium chain chlorinated paraffins' (MCCPs) can contain many thousands of possible different constituents. Therefore, MCCPs are considered a substance of Unknown or Variable composition, Complex reaction product or biological material (UVCB). The exact constituents of MCCPs will always be variable.

Given the complex and variable nature of these substances, a possible control measure is to limit the presence of the listed substance in other commercial products, up to a specified threshold. This 'concentration limit' approach is consistent with that taken for the previous Convention listing of SCCPs.

## Policy options

- **If we do nothing:**
  - MCCPs will not be added to the assimilated POPs Regulation, and there will continue to be no prohibition in GB on the manufacture, placing on the market and use of MCCPs.
- **Lead proposal** - add MCCPs to the assimilated POPs Regulation with specific use exemptions and UTC limits as set out in the draft SI:
  - The manufacture, placing on the market and use of MCCPs will be prohibited but with specific uses exempted from prohibition, and with substances, mixtures and articles containing up to specified UTC limits of MCCPs allowed, as set out in the draft SI.

## Supporting evidence for lead proposal

The intention of the proposal is to include all specific exemptions available under the Convention for this substance, using expiry dates that align with Convention expiry dates. The full list of the specific exemptions available can be found within the Convention text itself, and the accompanying draft SI clarifies how we propose to implement these time-limited exemptions in our assimilated POPs Regulation. A brief overview is also presented below:

- Flexible PVC limited to:
  - Construction sector, including maintenance of buildings and other structures, except for indoor flooring in non-commercial spaces - *expires 16 December 2031*.
  - Wires and cables in the construction sector – *expires 16 December 2031*.
  - Wires & cables in medical devices and in-vitro diagnostic devices (IVDD) - *expires 16 December 2031*.
  - Calendered films in packaging (excluding food packaging) — *expires 16 December 2031*.
- Solid woven conveyor belts used in underground coal mines — *expires 16 December 2031*.
- Flexible elastomeric foam for thermal insulation — *expires 16 December 2031*.
- Adhesives & sealants limited to the following uses:
  - polysulfide sealant & one component polyurethane foam used in sealing for doors and windows - *expires 16 December 2031*.

    - Waterproof coatings and anti-corrosion coatings - *expires 16 December 2031*.
    - aerospace and defence applications - *expires 16 December 2031*.
- Tape used for non-structural bonding in aerospace and defence products - *expires 16 December 2031*.
- Fat liquoring components in leather (excluding children's products) - *expires 16 December 2031*.
- Emergency response pyrotechnic devices - *expires 16 December 2031*.
- Paints and coatings for ammunition and ammunition markings - *expires 16 December 2031*.
- Metalworking fluids used in professional or industrial settings with collection systems, limited to use as extreme temperature and pressure additives for metalworking fluids in heavy-duty processes for production and repair of metals and metal alloy components — *expires 31 December 2036*.
- Polymers and rubbers used in replacement parts for and repair of the following articles (where MCCPs were originally used in the manufacture of the articles) - *until the earlier of end of service life of the article or 31 December 2041*:
    - parts for land-based motor vehicles and machinery in agriculture, construction, forestry, landscaping;
    - electrical and electronic equipment for medical devices, in-vitro diagnostic devices and instruments for measurement, analysis, manufacturing, control, monitoring, testing and inspection;
    - aerospace and defence applications;
- Ammunition pyrotechnic defence devices to achieve specific effects — *expires 31 December 2041*.
- Intumescent coatings and paints for space and defence equipment and their packaging to protect against extreme temperature — *expires 31 December 2041*.
- Coatings and paints for the repair of and use in replacement parts for space and defence equipment (where MCCPs were originally used in the manufacture of the equipment) — *allowed until end of service life of the equipment*.

We propose including all exemptions available under the Convention for this substance to provide a period for any remaining users to transition to alternatives. This should mitigate potential negative impacts on UK Growth or critical infrastructure, particularly where downstream users do not have full awareness of composition of products they rely on, such as with complex articles comprising many sub-components with long and complex global supply chains.

We also propose incorporating UTC limits to allow MCCPs to be present in substances, mixtures and articles, up to certain thresholds outlined below. When setting UTC limits, our general intention is to provide certainty to industry and set a threshold which is achievably detectable and not high enough to bring any benefit for presence as an active ingredient. We believe these proposals to be detectable, enforceable, proportionate, and pragmatic, but responses to this consultation will help to inform final decisions on appropriate UTC limits for GB.

Our proposed limits are outlined below and are detailed in the accompanying draft SI:

- for presence of MCCPs in substances and mixtures: up to 3 per cent by weight
- for presence of MCCPs in articles: up to 0.45 per cent by weight

The 3 per cent value is proposed because it is effectively the Convention-agreed upper threshold for UTC limits for MCCPs. The Convention have only applied such an equivalent upper threshold for one other existing POP, which is SCCPs. This was set at 1 per cent at Convention level, and was implemented in the assimilated POPs Regulation with an equivalent UTC limit of 1 per cent (for presence of SCCPs in substances and mixtures) and 0.15 per cent (for presence of SCCPs in articles). Therefore, the approach proposed for the MCCPs UTC limit is consistent with the one previously taken for SCCPs. The Convention have committed to reviewing MCCPs' upper threshold figure of 3 per cent, with a view to potentially lowering this threshold at future COPs. If the Convention decides to lower the 3 per cent upper threshold, this lowered threshold will then need to be implemented in the assimilated POPs Regulation.

The intention of this proposal is to define the prohibited substance(s) in line with the definition as adopted by the Stockholm Convention. This is detailed in the draft Statutory Instrument (SI).

The EU has also recently proposed an equivalent prohibition of MCCPs through their EU POPs Regulation, which applies in Northern Ireland. The EU's proposals for MCCPs are available online here and include many of the same specific use exemptions available under the Convention, but not all of the exemptions. There are also some differences in the EU's proposed UTC limits compared to ours. The EU have also proposed to only refer to part of the Convention's definition of the substance, whereas our proposed definition more strictly matches the entirety of the Convention's wording. We provide more details and seek views on these differences in the following set of questions, but also note that the EU's proposals may not reflect the final measures they ultimately adopt. Should GB and the EU implement their proposed prohibitions as they are currently proposed, there would be some minor divergence in the specific exemptions and UTCs limits implemented in GB, and NI and EU, as well as some difference in the way the substances are defined. We do not anticipate any impacts on trade arising from this divergence, but welcome views on this in the consultation.

We will continue to monitor the EU's developing position, where known, and should any unexpected incompatibilities arise, we will consider whether mitigations may be necessary.

## Consultation questions

When answering these questions, you may wish to consider how the domestic implementation of the global prohibition of MCCPs could impact you, your business, or your sector, including whether and to what extent these substances appear in supply chains you may rely on. In particular, you might consider the following:

i. Whether there is an on-going need for the use of MCCPs. This could include uses covered by the list of agreed time-limited exemptions, or it could be an additional application.
ii. Where MCCPs enter supply chains, specifically:
    a. the stage of use (for example raw material, component, end-product)

b. the country of origin or introduction.

iii. What quantities of MCCPs are being used and how this has changed over time and is expected to change in the future.
iv. How many companies currently use MCCPs and whether these are micro, small, or medium sized businesses.
v. Whether alternatives to MCCPs have been identified, and when these alternatives will be ready for implementation.
vi. What the expected transition time is away from the use of MCCPs to alternatives.
vii. What the costs of transition might be (including but not limited to: administrative and familiarisation costs, regulatory compliance, testing, reformulation, and price impacts of alternatives).
viii. Potential environmental and human health impacts.
ix. Potential implications for the functioning of the UK internal market.
x. What benefits or costs to GB businesses might arise if the EU POPs prohibitions referred to in this consultation were implemented in GB in the same way they have been proposed or implemented in the EU.

9. To what extent do you agree or disagree with the proposal to prohibit MCCPs under the assimilated POPs Regulation, as detailed in the accompanying draft SI?
    a. Strongly agree
    b. Agree
    c. Neither agree nor disagree
    d. Disagree
    e. Strongly disagree
    f. Don’t know
    g. Prefer not to say

    Please explain the reasons for your answer, including any supporting evidence or information.

10. i) To what extent do you agree or disagree with the proposed specific exemptions for MCCPs, as detailed in the draft SI?
    a. Strongly agree
    b. Agree
    c. Neither agree nor disagree
    d. Disagree
    e. Strongly disagree
    f. Don’t know
    g. Prefer not to say

    ii) Please indicate which, if any, of the proposed exemptions you consider particularly important or of concern. (If relevant, please refer to the specific exemptions as set out in the draft SI).

    iii) Please explain the reasons for your answers to i) and ii), including any supporting evidence or information.

    You may find the following supplementary information helpful to your responses to question 10:

*We are proposing to include all of the time-limited specific use exemptions available for MCCPs under the Stockholm Convention, in line with Convention expiration dates, as set out in the draft SI attached to this consultation. The latest EU proposals include fewer of the available exemptions, as set out in their draft proposal here.*

11. What environmental impacts do you expect to arise from implementation of the proposed measures on MCCPs, as detailed in the accompanying draft SI?

    Please explain the reasons for your answer and include any evidence on impacts to ecosystems, biodiversity and waste management, as well as any potential greenhouse gas (GHG) implications.

12. To what extent do you agree or disagree with the following proposed UTC limits for the presence of MCCPs in substances, mixtures or articles?
    - Up to 3 per cent in substances and mixtures
    - Up to 0.45 per cent in articles

    a. Strongly agree
    b. Agree
    c. Neither agree nor disagree
    d. Disagree
    e. Strongly disagree
    f. Don't know
    g. Prefer not to say

    Please explain the reasons for your answer, including any supporting evidence or information on the proposal's suitability for GB. This may include information regarding technical feasibility, socio-economic implications and financial impacts, impacts on recycling, supply chains, compliance costs, and any potential trade or market implication.

    You may find the following supplementary information helpful to your response:
    *The EU has proposed to introduce a UTC limit for MCCPs to allow concentrations of MCCPs equal to or below 1000 mg/kg (0.1 per cent by weight) to be present in substances, mixtures, and articles. A separate question later in this consultation seeks views specifically on whether the EU's proposed approach would be suitable for implementation in GB.*

13. The EU has recently consulted on a proposed definition of MCCPs (outlined below) to use in the EU POPs Regulation. This proposal reflects the latest available EU position, though the final adopted measure may differ.

    To help you answer this question, please refer to the following EU definition:
    *'Medium-chain chlorinated paraffins' or 'MCCPs' means the following: Substances or mixtures that contain any of the following linear C14–17 chloroalkanes of the following molecular formulae: $C_{14}H_{(30-y)}Cl_y$ where y ≥ 5; $C_{15}H_{(32-y)}Cl_y$ where y ≥ 5; $C_{16}H_{(34-y)}Cl_y$ where y ≥ 6; $C_{17}H_{(36-y)}Cl_y$ where y ≥ 6.*

Would the same definition be suitable for equivalent implementation in GB?

a. Yes
b. No
c. Don't know
d. Prefer not to say

Please explain the reasons for your answer, including any supporting evidence or information on the proposal's suitability for GB and to quantify what, if any, impacts that might result from different definitions of MCCPs being applied in GB and NI. This may include information regarding technical feasibility, potential socio-economic implications and financial costs, testing, impacts on recycling, supply chains, compliance costs, and any potential trade or market implications.

14. The EU has recently consulted on a proposed UTC limit for MCCPs (see below). This proposal reflects the latest available EU position, though the final measure may differ.

To help you answer this question, please refer to the following:
*Proposed EU UTC limit for MCCPs for EU, which would apply to NI:*

- *1000 mg/kg (0.1 per cent by weight) for presence in substances, mixtures or articles applying to the sum of concentrations of the linear C14–17 chloroalkanes of the following molecular formulae: $C_{14}H_{(30-y)}Cl_y$ where y ≥ 5; $C_{15}H_{(32-y)}Cl_y$ where y ≥ 5; $C_{16}H_{(34-y)}Cl_y$ where y ≥ 6; $C_{17}H_{(36-y)}Cl_y$ where y ≥ 6*

Would the EU's proposed UTC limit for MCCPs be suitable for equivalent implementation in GB?

a. Yes
b. No
c. Don't know
d. Prefer not to say

Please explain the reasons for your answer, including any supporting evidence or information on the approach's suitability for GB and any impact that might result from different UTC limits being applied in GB and NI for this substance. This may include information regarding technical feasibility, potential socio-economic implications and financial costs, testing, impacts on recycling, supply chains, compliance costs, and any potential trade or market implication.

## Adding new POPs – long-chain perfluorocarboxylic acids (LC-PFCAs)

### Substance information

| Substance | Date of implementation under the Stockholm Convention | Examples of known historical uses, either in the UK, globally or both | Potentially relevant sectors (non-exhaustive), UK and globally | Example CAS numbers |
|---|---|---|---|---|
| Long-chain perfluorocarboxylic acids (LC-PFCAs), including their salts and related compounds | 16 December 2026 | Multiple uses, including food packaging and fire-fighting foams, and they can be unintentionally produced during the manufacture of other PFAS | Semiconductors, automotive (and other combustion engine industries) | 375-95-1; 335-76-2; 2058-94-8; 307-55-1; 72629-94-8; 376-06-7; 141074-63-7; 67905-19-5; 57475-95-3; 16517-11-6; 133921-38-7; 68310-12-3; and others |

LC-PFCAs and their salts and related compounds have historically been used because of their chemical stability, surfactant properties, and resistance to heat and degradation. They are used, or have been used, across a wide range of applications globally, including industrial processes, electronic, medical and laboratory devices, photo-imaging, inks, food-contact materials, paints, coatings and varnishes (including construction materials), fire-fighting foams, textiles and apparel, personal care products, cleaning agents, ski waxes, and automotive applications. In some products and articles, their presence may also arise unintentionally as by-products of the manufacture of other PFAS or from other industrial processes. Historically, following the prohibition under the assimilated POPs Regulation of PFOA and PFOS (shorter chain PFAS that contain longer chains as impurities), we expect the majority of uses of LC-PFCAs to have been phased out in Great Britain.

In 2021, the EU amended Annex XVII of their REACH regime to include an EU REACH restriction on PFCAs containing 9–14 carbon atoms (C9–C14 PFCAs), their salts and related substances. That EU REACH restriction has applied since 25 February 2023 and prohibits the manufacture, placing on the market and use of these substances unless 6tpresent at very low concentrations. Longer chains of this compound (C15-C21) were not covered by the EU REACH restriction. No equivalent UK REACH restriction has yet been introduced through UK REACH.

We anticipate that most uses and presence as by-products have already been phased out in the UK. A call for information on the POPRC evaluation documents in 2023 for LC-PFCAs was undertaken but these received no responses from UK industry concerning this group of substances.

Exemptions under the Stockholm Convention were granted for the manufacture, placing on the market and use of LC-PFCAs and their compounds for semiconductors used as replacement parts for combustion engine vessels and for land-based motor vehicles that have ceased mass production. These derogations apply until the earlier of the end of the service life of the articles concerned or 31 December 2041, with an additional time-limited derogation for other semiconductor replacement parts of 5 years from the date of entry into force under the Convention.

## Policy options

- **If we do nothing:**
  - LC-PFCAs will not be added to the assimilated POPs Regulation, there will continue to be no prohibition in GB for the manufacturing, placing on the market and use of LC-PFCAs.
- **Lead proposal:**
  - add LC-PFCAs to the assimilated POPs Regulation with specific use exemptions and UTC limits, as set out in the draft SI.
  - The manufacturing, placing on the market and use of LC-PFCAs will be prohibited but with specific uses exempted from the prohibition, and with substances, mixtures and articles and specified materials in 2 applications containing up to the specified UTC limits of LC-PFCAs allowed, as set out in the draft SI.

## Supporting information for lead proposal

The intention of the proposal is to include all specific exemptions available under the Stochholm Convention for this substance, using expiry dates that align with Convention expiry dates. The full list of the specific exemptions available can be found within the Convention text itself, and the accompanying draft SI clarifies how we propose to implement these time-limited exemptions in our assimilated POPs Regulation. A brief overview is also presented below.

- Semiconductors designed for replacement parts for combustion engine powered vessels: *allowed until the earlier of end of service life or 31 December 2041*.
- Replacement parts for land-based motor vehicles that have ceased mass production: *allowed until the earlier of end of service life or 31 December 2041*.
- Semiconductors designed for other replacement parts (not covered in the 2 points above): *expires 16 December 2031*.

All of the available specific-use exemptions apply to replacement parts, or components of replacement parts. Although we anticipate many historic global users to have already

phased out use of LC-PFCAs, our proposal to include all exemptions available under the Convention for this substance provides a period for any remaining users to transition to alternatives. This should mitigate potential negative impacts on UK growth and critical infrastructure, particularly where downstream users do not have full awareness of the composition of products they rely on, such as with complex articles comprising many sub-components with long and complex global supply chains.

We also propose incorporating several UTC limits to allow LC-PFCAs, its salts and related compounds, to be present in substances, mixtures, or articles in GB, at various thresholds outlined below. The proposed limits are intended to provide certainty to industry and set thresholds which are achievably detectable and not high enough to bring any benefit for presence as an active ingredient. We propose lower limits where precise measurement and control are feasible. We believe these proposals to be detectable, enforceable, proportionate, and pragmatic, but responses to this consultation will help to inform final decisions on appropriate UTC limits for GB.

The proposed limits are outlined below and are detailed in the accompanying draft SI:

- For general presence in substances, mixtures or articles:
    - concentrations up to 0.025 mg/kg (0.0000025 per cent) for LC-PFCAs and their salts
    - concentrations up to 1.0 mg/kg (0.0001 per cent) for the sum of related compounds of LC-PFCAs
- For presence in polytetrafluoroethylene (PTFE) micro-powders:
    - concentrations up to 1.0 mg/kg (0.0001 per cent) for LC-PFCAs and their salts in PTFE micro-powders produced by ionising irradiation or thermal degradation, provided these powders are then transported or treated to reduce LC-PFCA concentrations to the lower threshold of 0.025 mg/kg (0.0000025 per cent)
- For presence in other fluoropolymers:
    - concentrations up to 0.1 mg/kg (0.00001 per cent by weight) for LC-PFCAs and their salts

The intention of this proposal is to define the prohibited substance(s) in line with the definition as adopted by the Stockholm Convention. This is detailed in the draft legislation but also outlined below. We note that the Convention bodies intend to prepare an indicative list of specific chemical formulae and CAS numbers that apply to the various salts and related compounds for LC-PFCAs. This is in addition to the equivalents for the already-prohibited PFAS-POPs: PFOA, PFOS and PFHxS. This indicative list will not alter the definition of the substance(s) prohibited under the Convention, nor those substance(s) proposed to be prohibited under the assimilated POPs Regulation. The definition of LC-PFCAs is set out in the draft statutory instrument (SI) and covers its salts and related compounds. The definition we have provided in the draft SI aligns with the one agreed upon by parties to the Stockholm Convention.

The EU has also recently proposed the equivalent prohibition of LC-PFCAs through their EU POPs Regulation, which applies in Northern Ireland, though some of these substances have already been prohibited under EU REACH since 2023. The EU's proposals for LC-

PFCAs are available online here and include similar time-limited specific use exemptions as we have proposed, but their proposed transition times are shorter to match dates they had already specified in their previous EU REACH restriction. There are some differences in some of their proposed UTC limits compared to ours. We provide more details and seek views on these differences in the following set of questions, but also note that the EU's proposals may not reflect the final measures that they will ultimately adopt. Should GB and the EU implement the prohibitions as they currently propose to, there would be some minor divergence in the specific exemptions and UTC limits implemented in GB and NI and EU. We do not anticipate any impacts on trade arising from this divergence, but welcome views on this in the consultation.

We will continue to monitor the EU's developing position, where known, and should any unexpected incompatibilities arise we will consider whether mitigations may be necessary.

## Consultation questions

When answering these questions, you may wish to consider how the domestic implementation of the global prohibition of LC-PFCAs could impact you, your business, or your sector, including whether and to what extent these substances appear in supply chains you may rely on. In particular, you might consider the following:

i. Whether there is an on-going need for the use of LC-PFCAs. This could include uses covered by the list of agreed time-limited exemptions, or it could be an additional application.
ii. Where LC-PFCAs enter supply chains, specifically:
    a. the stage of use (for example: raw material, component, end-product)
    b. the country of origin or introduction
iii. What quantities of LC-PFCAs are being used and how this has changed over time and is expected to change in the future.
iv. How many companies currently use LC-PFCAs and whether these are micro, small, or medium sized businesses.
v. Whether alternatives to LC-PFCAs have been identified, and when these alternatives will be ready for implementation.
vi. What the expected transition time is away from the use of LC-PFCAs to alternatives.
vii. What the costs of transition might be (including but not limited to: admin and familiarisation costs, regulatory compliance, testing, reformulation, and price impacts of alternatives).
viii. Potential environmental and human health impacts.
ix. Potential implications for the functioning of the UK internal market.
x. What benefits or costs to GB businesses might arise if the EU POPs prohibitions referred to in this consultation were implemented in GB in the same way they have been proposed or implemented in the EU.

15. To what extent do you agree or disagree with the proposal to prohibit LC-PFCAs under the assimilated POPs Regulation, as detailed in the accompanying draft SI?
    a. Strongly agree
    b. Agree

c. Neither agree nor disagree
d. Disagree
e. Strongly disagree
f. Don't know
g. Prefer not to say

Please explain the reasons for your answer, including any supporting evidence or information.

16. i) To what extent do you agree or disagree with the proposed specific exemptions for LC-PFCAs, as detailed in the draft SI?
    a. Strongly agree
    b. Agree
    c. Neither agree nor disagree
    d. Disagree
    e. Strongly disagree
    f. Don't know
    g. Prefer not to say

    ii) Please indicate which, if any, of the proposed exemptions you consider particularly important or of concern. (If relevant, please refer to the specific exemptions as set out in the draft SI).
    iii) Please explain the reasons for your answers to i) and ii), including any supporting evidence or information.

    You may find the following supplementary information helpful to your response:

    *We are proposing to include all of the time-limited specific use exemptions available for LC-PFCAs under the Stockholm Convention, in line with Convention expiration dates, as set out in the draft SI attached to this consultation. The latest EU proposals include shorter transition times for the available exemptions, as set out in their draft proposal here.*

17. To what extent do you agree or disagree with the following proposed UTC limits for the presence of LC-PFCAs in substances, mixtures or articles?
    - Up to 0.025 mg/kg (0.0000025 per cent) for LC-PFCAs and their salts
    - Up to 1.0 mg/kg (0.0001 per cent) for the sum of related compounds of LC-PFCAs

    a. Strongly agree
    b. Agree
    c. Neither agree nor disagree
    d. Disagree
    e. Strongly disagree
    f. Don't know
    g. Prefer not to say

    Please explain your answer, including any supporting evidence or information on whether these limits are suitable for GB. This may include information regarding

technical feasibility, socio-economic implications and financial impacts, impacts on recycling, supply chains, compliance costs, and any potential trade or market implication.

*For comparison, the EU has proposed slightly different limits:*

- *0.025 mg/kg for LC-PFCAs and their salts (same as GB proposal)*
- *0.26 mg/kg for the sum of related compounds (lower than GB proposal)*

18. PTFE micro-powders are used in certain industrial applications. We propose a UTC limit of 1 mg/kg (0.0001 per cent) for LC-PFCAs and their salts in PTFE micro-powders produced by ionising irradiation or thermal degradation, provided these powders are then transported or treated to reduce LC-PFCA concentrations to the lower threshold of 0.025 mg/kg (0.0000025 per cent).

    To what extent do you agree or disagree with the proposed UTC limit?

    a. Strongly agree
    b. Agree
    c. Neither agree nor disagree
    d. Disagree
    e. Strongly disagree
    f. Don’t know
    g. Prefer not to say

    Please explain the reasons for your answer, including any supporting evidence or information on the proposal’s suitability for GB. This may include information regarding technical feasibility, socio-economic implications and financial impacts, impacts on recycling, supply chains, compliance costs, and any trade or market implication.

    You may find the following supplementary information helpful to your response:
    *The EU has also proposed to introduce a similar UTC limit: to allow LC-PFCAs and their salts to be present in PTFE micro-powders equal to or below 1 mg/kg (0.0001 per cent by weight) where they are present in PTFE micro-powders produced by ionising irradiation or by thermal degradation if such PTFE micro-powders are transported or treated for the purpose of reducing the concentration of LC-PFCAs and their salts below the limit of 0.025 mg/kg (0.0000025 per cent by weight).*

19. To what extent do you agree or disagree with the proposed UTC limit for GB to allow concentrations of LC-PFCAs and their salts equal to or below 0.1 mg/kg (0.00001 per cent by weight) to be present in other fluoropolymers?

    a. Strongly agree
    b. Agree
    c. Neither agree nor disagree
    d. Disagree
    e. Strongly disagree
    f. Don’t know
    g. Prefer not to say

    Please explain the reasons for your answer, including any supporting evidence or information on the proposal’s suitability for GB. This may include information regarding

technical feasibility, potential socio-economic implications and financial costs, impacts on recycling, supply chains, compliance costs, and any trade or market implications.

You may find the following supplementary information helpful to your response:
*The EU's most recent proposal includes several different UTC limits depending on the application. Within that single proposal, the EU has suggested a UTC limit of 0.1 mg/kg (0.00001 per cent by weight) for fluoropolymers (fluoroplastics and fluoroelastomers that contain perfluoroalkoxy groups), not applying to articles.*

20. The EU has recently consulted on proposed UTC limits for LC-PFCAs (outlined below). These summarise the most recent proposals available, though they may not reflect the final measures the EU ultimately adopts.

*Proposed EU UTC limits for LC-PFCAs, which would apply to Northern Ireland:*

- *For presence in substances, mixtures or articles*
  - *0.025 mg/kg for LC-PFCAs and their salts*
  - *0.26 mg/kg for the sum of related compounds*
- *For presence of LC-PFCAs and their salts in PTFE micro-powders:*
  - *equal to or below 1 mg/kg (0.0001 per cent by weight) where they are present in PTFE micro-powders that are transported or treated for the purpose of to reduce the sum of concentrations of C9-C21 LC-PFCAs and their salts below the limit of 0.025 mg/kg (0.0000025 per cent by weight).*
- *For presence in a substance to be used as a transported isolated intermediate for the production of fluorochemicals with a perfluoro C chain equal to or shorter than 6 atoms*
  - *equal to or below 10 mg/kg (0.001 per cent by weight) for the sum of concentrations of C9-21 PFCAs, their salts and related compounds*
- *For presence in fluoroplastics and fluoroelastomers that contain perfluoroalkoxy groups (not including articles)*
  - *0.1 mg/kg (0.00001 per cent by weight) for the sum of concentrations of C9-21 PFCAs*

Would the EU's proposed UTC limits for LC-PFCAs (outlined above) be suitable for equivalent implementation in GB, considering the key differences between the EU's proposal and GB's proposal?

a. Yes
b. No
c. Don't know
d. Prefer not to say

Please explain the reasons for your answer, including any supporting evidence or information on the approach's suitability for GB and any impact that might result from different UTC limits being applied in GB and NI for this substance. This may include information regarding technical feasibility, potential socio-economic implications and financial costs, testing, impacts on recycling, supply chains, compliance costs, and any potential trade or market implications.

# Adding new POPs – Chlorpyrifos

## Substance information

| Substance | Date of implementation under the Stockholm Convention | Examples of known historical uses, either in the UK, globally or both | Potentially relevant sectors (non-exhaustive), UK and globally | Brief overview of specific exemptions available under Stockholm Convention. (Timelines not specified) | Example CAS numbers |
|---|---|---|---|---|---|
| Chlorpyrifos | 16 December 2026 | Pesticide | Agriculture, pest control | Including, but not limited to:<br>• Various specified crop pest combinations<br>• Wood preservation against borers and termites in building foundations | 2921-88-2 |

Chlorpyrifos is an organophosphate insecticide historically used in agriculture and pest control. It was widely applied to crops and non-food sites globally, but concerns over health risks led to a wide withdrawal of its use.

In the UK:

- Most uses were banned in 2016 after HSE found operator exposure exceeded safe levels.
- A very limited exemption for brassica seedlings was allowed temporarily but has since ended.
- Chlorpyrifos has not been authorised for plant protection products or biocides since 2020, and there are no known current uses.

At EU level:

- EFSA reviews in 2015 and 2019 identified genotoxicity and developmental neurotoxicity risks.
- In 2020, EU Member States were required to withdraw authorisations for plant protection products containing chlorpyrifos, and this applied in the UK at that time.

As a result, chlorpyrifos is no longer used in the UK as a plant protection product.

## Policy options

- **If we do nothing:**
    - Chlorpyrifos would not be added to the assimilated POPs Regulation. While chlorpyrifos is already no longer authorised for use as a pesticide in the UK, this do-nothing option would mean there would continue to be no prohibition in GB on its manufacture, placing on the market, and use for other purposes.
- **Lead proposal** - add chlorpyrifos to the assimilated POPs Regulation with *no* specific-use exemptions but with a UTC limit, as set out in the draft SI:
    - The manufacture, placing on the market and use of chlorpyrifos will be prohibited but with substances, mixtures and articles containing up to the specified UTC limit of chlorpyrifos exempted from prohibition, as set out in the draft SI.

## Supporting information for lead proposal

Evidence suggests chlorpyrifos is no longer used in the UK, so the intention of the proposal is to include none of the specific exemptions available under the Convention for this substance. The full list of the specific exemptions available under the Convention can be found within the Convention text itself, but we propose to *not* include any of these time-limited specific exemptions for chlorpyrifos in our assimilated POPs Regulation.

We also propose including a UTC limit of 0.01 mg/kg (for presence of chlorpyrifos in substances, mixtures or articles), which aligns with existing maximum residue levels (MRLs) for this historic pesticide across a range of food types. The proposed limit is intended to provide certainty to industry and to set a threshold which is achievably detectable and not high enough to bring any benefit for its presence as an active ingredient. We believe these proposals to be detectable, enforceable, proportionate, and pragmatic, but responses to this consultation will help to inform final decisions on appropriate UTC limits for GB.

The EU has also recently proposed an equivalent prohibition of chlorpyrifos through their EU POPs Regulation, which applies in NI. The EU's proposals for chlorpyrifos are available online here and take the same approach to specific exemptions and UTC limits as we have proposed for this substance, but these EU proposals may not reflect the final measures that they will ultimately adopt. Should GB and the EU implement the prohibitions as they currently propose to, there would be no divergence between GB and NI and EU and therefore no impact on trade.

We will continue to monitor the EU's developing position, where known, and should any unexpected incompatibilities arise we will consider whether mitigations may be necessary.

## Consultation questions

When answering these questions, you may wish to consider how the domestic implementation of the global prohibition of chlorpyrifos could impact you, your business, or your sector, including whether and to what extent this substance appears in supply chains you may rely on. In particular, you might consider the following:

i. Whether there is an on-going need for the use of chlorpyrifos. This could include uses covered by the list of agreed time-limited exemptions, or it could be an additional application.
ii. Where chlorpyrifos enters supply chains, specifically:
    a. the stage of use (for example raw material, component, end-product)
    b. the country of origin or introduction
iii. What quantities of chlorpyrifos are being used and how this has changed over time and is expected to change in the future.
iv. How many companies currently use chlorpyrifos and whether these are micro, small, or medium sized businesses.
v. Whether alternatives to chlorpyrifos have been identified, and when these alternatives will be ready for implementation.
vi. What the expected transition time is away from the use of chlorpyrifos to alternatives.
vii. What the costs of transition might be (including but not limited to: admin and familiarisation costs, regulatory compliance, testing, reformulation, and price impacts of alternatives).
viii. Potential environmental and human health impacts.
ix. Potential implications for the functioning of the UK internal market.
x. What benefits or costs to GB businesses might arise if the EU POPs prohibitions referred to in this consultation were implemented in GB in the same way they have been proposed or implemented in the EU.

21. To what extent do you agree or disagree with the proposal to prohibit chlorpyrifos under the assimilated POPs Regulation, as detailed in the accompanying draft SI?
    a. Strongly agree
    b. Agree
    c. Neither agree nor disagree
    d. Disagree
    e. Strongly disagree
    f. Don’t know
    g. Prefer not to say

    Please explain the reasons for your answer, including any supporting evidence or information.

22. To what extent do you agree or disagree with the proposal to not include any specific use exemptions for chlorpyrifos to Annex I?
    a. Strongly agree
    b. Agree
    c. Neither agree nor disagree
    d. Disagree
    e. Strongly disagree
    f. Don’t know
    g. Prefer not to say

    Please explain the reasons for your answer, including any supporting evidence or information.

    You may find the following supplementary information helpful for your response:

*We are proposing to include none of the time-limited specific use exemptions available for chlorpyrifos under the Stockholm Convention, as set out in the draft SI attached to this consultation. The EU has also proposed to introduce chlorpyrifos without any specific exemptions, see their draft proposal here.*

23. To what extent do you agree or disagree with the following proposed UTC limit for the presence of chlorpyrifos in substances, mixtures or articles?
    - Up to 0.01 mg/kg (0.000001 per cent by weight**)**

    a. Strongly agree
    b. Agree
    c. Neither agree nor disagree
    d. Disagree
    e. Strongly disagree
    f. Don't know
    g. Prefer not to say

    Please explain the reasons for your answer, including any supporting evidence or information on the proposal's suitability for GB. This may include information regarding technical feasibility, potential socio-economic implications and financial costs, testing, impacts on recycling, supply chains, compliance costs, and any potential trade or market implication.

    You may find the following supplementary information helpful to your response:
    *The EU has also proposed to introduce a UTC limit for chlorpyrifos being present in concentrations equal to or below 0.01 mg/kg (0.000001 per cent by weight) where they are present in substances, mixtures or articles.*

# Adding new POPs – UV-328

## Substance information

| Substance | Date of implementation under the Stockholm Convention | Examples of known historical uses, UK and/or globally either in the UK, globally or both | Potentially relevant sectors in UK or globally (non-exhaustive) | Example CAS numbers |
|---|---|---|---|---|
| UV-328 | 26 February 2025 | A UV-absorber, protecting materials (plastics, coatings, adhesives, sealants) against degradation from UV radiation | Numerous, including automotive, industrial machinery, medical technology, paints and industrial coatings, aerospace, defence. | 25973-55-1 |

Evaluation dossiers drafted by POPRC, the technical committee for the Stockholm Convention, includes the following information about UV-328.

UV-328 is used as a UV-absorber as it can absorb the whole spectrum of UV light without being destroyed. It is used to protect materials from UV light-induced degradation or colour change caused by UV radiation. It is used in numerous sectors, including automotive, industrial machinery, medical technology, paints and industrial coatings, aerospace, and defence.

The main uses of UV-328 are in the automotive industry, such as automotive paints, coatings, sealants, adhesives, plastics and rubbers, as well as various automotive fluids, such as cooling and hydraulic liquids and lubricants in motor oil. It has also been used in printing inks and in plastics and rubbers for outdoor furniture, in construction materials, food packaging, wood products, cosmetics, and applications in leather and textiles.

According to the POPRC evaluation, releases and emissions of UV-328 have been known to occur during all of its life cycle stages due to past and present production, manufacturing, transportation and final use of the substance as well as during the use, disposal and end-of-life treatment of products containing UV-328. As UV-328 is not chemically bound to materials, the substance may be released from products and enter the environment, indicating the importance of its waste phase. Sources of release may include plastic litter containing UV-328, machine washing liquids, detergents, cosmetics, fragrances and air fresheners, as well as textiles.

In 2020, UV-328 was added to the Authorisation List (Annex XIV) of EU REACH, which later became part of assimilated law following the UK's exit from the EU. UV-328 has a sunset date in 2023, meaning that any continued use in GB after that date requires authorisation (unless relevant exemptions apply). One authorisation has been granted for the use of UV-328 in GB. There are also various provisions under UK REACH that currently allow for further use or presence, such as in imported articles, presence in mixtures up to a certain concentration (0.1 per cent weight by weight), and use as part of scientific research and development.

The authorised use of UV-328 in UK REACH has been incorporated in the proposed amendments to the assimilated POPs Regulation, through inclusion of a relevant specific exemption. Once UV-328 is prohibited through the assimilated POPs Regulation, we will review its continued inclusion on the Authorisation List under UK REACH.

## Policy options

- **If we do nothing:**
  - UV-328 will not be added to the assimilated POPs Regulation. Placing on the market, and use of UV-328 in GB would continue to be subject to authorisation under UK REACH.
- **Lead proposal** - add UV-328 to the assimilated POPs Regulation with specific use exemptions and a UTC limit, as set out in the draft statutory instrument (SI):
  - The manufacture, placing on the market and use of UV-328 will be prohibited but with specific uses exempted from prohibition, and with substances, mixtures and articles containing up to the specified UTC limit of UV-328 allowed, as set out in the draft statutory instrument (SI).

## Supporting information for lead proposal

The intention of the proposal is to recognise UV-328 as a POP in domestic legislation by adding it to the assimilated POPs Regulation. In doing so, we propose to include all specific exemptions available under the Convention for this substance, using expiry dates that align with the Convention. The full list of these exemptions can be found within the Convention text, and the accompanying draft SI clarifies how we propose to implement these time-limited exemptions in our assimilated POPs Regulation. A brief overview is also presented below.

- Land-based motor vehicles - *expires 26 February 2030*.
- Industrial coatings for engineering machines, rail transportation vehicles, and heavy-duty coatings for large steel structures - *expires 26 February 2030*.
- Mechanical separators in blood collection tubes - *expires 26 February 2030*.
- Triacetyl cellulose (TAC) films in polarisers - *expires 26 February 2030*.
- Photographic paper - *expires 26 February 2030.*
- Replacement parts for articles in the following applications (where UV-328 was originally used in the manufacture of the article):
  - land-based motor vehicles;

    - stationary industrial machines for use in agriculture, forestry or construction;
    - Liquid crystal displays (LCDs) in instruments for analysis, measurement, control, monitoring, testing, production, or inspection, other than for medical applications - *allowed until earlier of end of service life or 31 December 2044*.
- Replacement parts for articles in the following applications for medical purposes where UV-328 was originally used in the manufacture of the article:
    - LCDs in medical and in-vitro diagnostic devices;
    - LCDs in medical instruments for analysis, measurement, control, monitoring, testing, production, inspection - *allowed until end of service life of the article.*
- Aerospace (aircraft) uses: water-seal tape for insulation blankets and decking; polyurethane and polyamide adhesives and polyurethane coatings, for structural, mechanical, interior and electrical assemblies, and emergency, propulsion, environmental control and flight control systems - *expires 31 December 2030*.

Although most sectors have already begun phasing out UV-328, our proposal to include all exemptions available under the Convention for this substance provides a period for any remaining users to transition to alternatives. This should mitigate potential negative impacts on UK growth and critical infrastructure, particularly where downstream users do not have full awareness of the composition of products they rely on, such as with complex articles comprising many subcomponents with long and complex global supply chains.

We also propose incorporating a UTC limit to allow UV-328 to be present in substances, mixtures or articles equal to or below 10 mg/kg (0.001 per cent by weight) in GB. The proposed limit is intended to provide certainty to industry and to set a threshold which is achievably detectable and not high enough to bring any benefit for its presence as an active ingredient.  We believe these proposals to be detectable, enforceable, proportionate, and pragmatic, but responses to this consultation will help to inform final decisions on appropriate UTC limits for GB.

The EU has recently adopted an equivalent prohibition of UV-328 through their EU POPs Regulation, which applies in Northern Ireland and is available online here. They have introduced similar specific exemptions as we have proposed, but there are some differences in UTC limits. We provide more details and seek views on these differences in the following set of questions.

Should we implement the prohibitions as they are currently proposed, there would be some negligible divergence in the specific exemptions and some divergence in the UTC limits implemented in GB and NI and EU. We don’t anticipate any impacts on trade arising from this divergence, but welcome views on this in the consultation.

## Consultation questions

When answering these questions, you may wish to consider how the proposed implementation of the global prohibition of UV-328 could impact you, your business, or your sector, including whether and to what extent this substance appears in supply chains you may rely on. In particular:

i. Whether there is an on-going need for the use of UV-328. This could include uses covered by the list of agreed time-limited exemptions, or it could be an additional application.
ii. Where UV-328 enters supply chains, specifically:
    a. the stage of use (for example raw material, component, end-product)
    b. the country of origin or introduction
iii. What quantities of UV-328 are being used and how this has changed over time and is expected to change in the future.
iv. How many companies currently use UV-328 and whether these are micro, small, or medium sized businesses.
v. Whether alternatives to UV-328 have been identified, and when these alternatives will be ready for implementation.
vi. What the expected transition time is away from the use of UV-328 to alternatives.
vii. What the costs of transition might be (including but not limited to: admin and familiarisation costs, regulatory compliance, testing, reformulation, and price impacts of alternatives).
viii. Potential environmental and human health impacts.
ix. Potential implications for the functioning of the UK internal market.
x. What benefits or costs to GB businesses might arise if the EU POPs prohibitions referred to in this consultation were implemented in GB in the same way they have been proposed or implemented in the EU.

24. To what extent do you agree or disagree with the proposal to prohibit UV-328 under the assimilated POPs Regulation, as detailed in the accompanying draft statutory instrument?
    a. Strongly agree
    b. Agree
    c. Neither agree nor disagree
    d. Disagree
    e. Strongly disagree
    f. Don’t know
    g. Prefer not to say

    Please explain the reasons for your answer, including any supporting evidence or information.

25. i) To what extent do you agree or disagree with the proposed specific exemptions for UV-328, as detailed in the draft statutory instrument?
    a. Strongly agree
    b. Agree
    c. Neither agree nor disagree
    d. Disagree
    e. Strongly disagree
    f. Don’t know
    g. Prefer not to say

    ii) Please indicate which, if any, of the proposed exemptions you consider particularly important or of concern, (please refer to specific exemptions in the draft SI).

iii) Please explain the reasons for your answers to i) and ii), including any supporting evidence or information.

You may find the following supplementary information helpful for your response:
*We are proposing to include all of the time-limited specific use exemptions available for UV-328 under the Stockholm Convention, in line with Convention expiration dates, as set out in the draft SI attached to this consultation. The EU have already adopted all specific exemptions available for UV-328 under the Convention, as set out here.*

26. To what extent do you agree or disagree with the following proposed UTC limit for the presence of UV-328 in substances, mixtures or articles: up to 10 mg/kg (0.001 per cent by weight)?
    a. Strongly agree
    b. Agree
    c. Neither agree nor disagree
    d. Disagree
    e. Strongly disagree
    f. Don't know
    g. Prefer not to say

Please explain the reasons for your answer, including any supporting evidence or information on the proposal's suitability for GB. This may include information regarding technical feasibility, potential socio-economic implications and financial costs, testing, impacts on recycling, supply chains, compliance costs, and any potential trade or market implication.

27. The EU has recently implemented UTC limits for UV-328 (outlined below).

*The EU has introduced a staggered approach to UTC limits for UV-328 being present in substances, mixtures and articles as follows:*

*i. 100 mg/kg (0.01 per cent by weight) from 4th August 2025*
*ii. 10 mg/kg (0.001 per cent by weight) from 4th August 2027*
*iii. 1 mg/kg (0.0001 per cent by weight) from 4th August 2029*

Would this UTC limit approach be suitable for equivalent implementation in GB?
    a. Yes
    b. No
    c. Don't know
    d. Prefer not to say

Please explain the reasons for your answer, including any supporting evidence or information on the approach's suitability for GB and any impact that might result from different UTC limits being applied in GB and NI for this substance. This may include information regarding technical feasibility, potential socio-economic implications and financial costs, testing, impacts on recycling, supply chains, compliance costs, and any potential trade or market implication.

# Adding new POPs – Dechlorane Plus

## Substance information

| Substance | Date of implementation under the Stockholm Convention | Examples of known historical uses in either in the UK, globally or both | Potentially relevant sectors (non-exhaustive) in UK and globally | Example CAS numbers |
|---|---|---|---|---|
| Dechlorane Plus<br><br>(where 'Dechlorane Plus' includes its syn-isomer and anti-isomer.) | 26 February 2025 | Chlorinated flame retardant used in adhesives, sealants and polymers | Aerospace, space, defence, automotive, industrial machinery, medical and analytical instruments, in-vitro diagnostic devices, outdoor power equipment | 13560-89-9;<br><br>135821-03-3;<br><br>135821-74-8 |

Evaluation dossiers drafted by POPRC, the technical committee for the Stockholm Convention, includes the following information about Dechlorane Plus.

Dechlorane Plus is a polychlorinated flame retardant which has been marketed as a replacement substance for the previous POP flame retardant substance decabromodiphenyl ether (decaBDE). It is used as a flame retardant in adhesives, sealants and polymers and has also been used as an extreme pressure additive in greases degree. It is used in many sectors, including aerospace, space, defence, construction and the automotive sector.

Based on the available information, use in motor vehicles has accounted for 70–90 per cent of the total global use volume. The main use in this sector has been as a flame retardant in wire harnesses, connectors and insulation tape in cables and wires. It has also been used in electrical and electronic equipment, industrial machinery for use in agriculture, forestry and construction, consumer electronics, medical in-vitro diagnostic devices (IVDD), medical imaging and radiotherapy devices and installations, in analytical instruments, and in marine, garden and outdoor power equipment.

According to the POPRC evaluation, releases and emissions of Dechlorane Plus to the environment have been known to occur at all life cycle stages. Estimates suggest that the highest global Dechlorane Plus emissions come from the manufacture of Dechlorane Plus. The next highest release to the environment comes from waste dismantling and recycling, followed by landfills. Global production of Dechlorane Plus has now ceased, but stockpiles remain.

## Policy options

- **If we do nothing:**
  - Dechlorane Plus will not be added to the assimilated POPs Regulation, there will continue to be no prohibition in GB on placing on the market and use of Dechlorane Plus.
- **Lead proposal** - add Dechlorane Plus to the assimilated POPs Regulation with specific use exemptions and a UTC limit, as set out in the draft SI.
  - The placing on the market and use of Dechlorane Plus will be prohibited but with specific uses exempted from prohibition, and with substances, mixtures and articles containing up to the specified UTC limit of Dechlorane Plus allowed, as set out in the draft SI.

## Supporting information for lead proposal

The intention of the proposal is to include all specific exemptions available under the Convention for this substance, using expiry dates that align with Convention expiry dates. The full list of the specific exemptions available under the Convention can be found within the Convention text itself, and the accompanying draft SI clarifies how we propose to implement these time-limited exemptions in our assimilated POPs Regulation. A brief overview is also presented below.

- Aerospace applications — *expires 26 February 2030*.
- Space and defence applications — *expires 26 February 2030*.
- Medical imaging and radiotherapy devices and installations — *expires 26 February 2030*.
- Replacement parts for and repair of articles where Dechlorane Plus was originally used in the manufacture of the article:
  - aerospace, space, defence; land-based motor vehicles; stationary industrial machines (agriculture, forestry, construction); marine, garden, / forestry, outdoor power equipment; instruments for analysis, measurement, control, monitoring, testing, production, / inspection — *allowed until the earlier of end of the service life of the article or 31 December 2044.*
- Replacement parts for and repair of articles for medical devices and IVDD where Dechlorane Plus was originally used in the manufacture of the article — *allowed until the end of the service life of the article*.

Although global production of Dechlorane Plus has already ceased, and most sectors have already begun phasing out Dechlorane Plus, our proposal to include all exemptions available under the Convention for this substance provides a period for any remaining users to transition to alternatives. This should mitigate potential negative impacts on UK Growth and critical infrastructure, particularly where downstream users do not have full awareness of the composition of products they rely on, such as with complex articles comprising many subcomponents with long and complex global supply chains.

We also propose incorporating a UTC limit to allow Dechlorane Plus to be present in substances, mixtures or articles equal to or below 10 mg/kg (0.001 per cent by weight) in GB. The proposed limit is intended to provide certainty to industry and set a threshold which

is achievably detectable and not high enough to bring any benefit for presence as an active ingredient. We believe these proposals to be detectable, enforceable, proportionate, and pragmatic, but responses to this consultation will help to inform final decisions on appropriate UTC limits for GB.

The EU has recently adopted an equivalent prohibition of Dechlorane Plus through their EU POPs Regulation, which applies in Northern Ireland and is available online here. They have introduced similar specific exemptions as we have proposed, but there are some differences in UTC limits. We provide more details and seek views on these differences in the following set of questions. Should GB and the EU implement the prohibitions as they are currently proposed, there would be some minor divergence in the specific exemptions and UTC limits implemented in GB and NI and EU. We don't anticipate any impacts on trade arising from this divergence, but welcome views on this in the consultation.

## Consultation questions

When answering these questions, you may wish to consider how the domestic implementation of the global prohibition of Dechlorane Plus could impact you, your business, or your sector, including whether and to what extent this substance appears in supply chains you may rely on. In particular:

i. Whether there is an on-going need for the use of Dechlorane Plus. This could include uses covered by the list of agreed time-limited exemptions, or it could be an additional application.
ii. Where Dechlorane Plus enters supply chains, specifically:
    a. the stage of use (for example raw material, component, end-product)
    b. the country of origin or introduction
iii. What quantities of Dechlorane Plus are being used and how this has changed over time and is expected to change in the future.
iv. How many companies currently use Dechlorane Plus and whether these are micro, small, or medium sized businesses.
v. Whether alternatives to Dechlorane Plus have been identified, and when these alternatives will be ready for implementation.
vi. What the expected transition time is away from the use of Dechlorane Plus to alternatives.
vii. What the costs of transition might be (including but not limited to: admin and familiarisation costs, regulatory compliance, testing, reformulation, and price impacts of alternatives).
viii. Potential environmental and human health impacts.
ix. Potential implications for the functioning of the UK internal market.
x. What benefits or costs to GB businesses might arise if the EU POPs prohibitions referred to in this consultation were implemented in GB in the same way they have been proposed or implemented in the EU.

28. To what extent do you agree or disagree with the proposal to prohibit Dechlorane Plus under the assimilated POPs Regulation, as detailed in the accompanying draft SI?
    a. Strongly Agree
    b. Agree
    c. Neither agree nor disagree

d. Disagree
e. Strongly Disagree
f. Don’t know
g. Prefer not to say

Please explain the reasons for your answer, including any supporting evidence or information.

29. i) To what extent do you agree or disagree with the proposed specific exemptions for Dechlorane Plus, as detailed in the draft statutory instrument?
    a. Strongly Agree
    b. Agree
    c. Neither agree nor disagree
    d. Disagree
    e. Strongly Disagree
    f. Don’t know
    g. Prefer not to say

    ii) Please indicate which, if any, of the proposed exemptions you consider particularly important or of concern. (If relevant, please refer to the specific exemptions as set out in the draft SI).

    iii) Please explain the reasons for your answers to i) and ii), including any supporting evidence or information.

    You may find the following supplementary information helpful for your response:

    *We are proposing to include all of the time-limited specific use exemptions available for Dechlorane Plus under the Stockholm Convention, in line with Convention expiration dates, as set out in the draft SI attached to this consultation. The EU have already adopted all specific exemptions available for Dechlorane Plus under the Convention, as set out here.*

30. To what extent do you agree or disagree with the following proposed UTC limit for the presence of Dechlorane Plus in substances, mixtures or articles?
    - Up to 10 mg/kg (0.001 per cent by weight).

    a. Strongly Agree
    b. Agree
    c. Neither agree nor disagree
    d. Disagree
    e. Strongly Disagree
    f. Don’t know
    g. Prefer not to say

    Please explain the reasons for your answer, including any supporting evidence or information on the proposal’s suitability for GB. This may include information regarding technical feasibility, potential socio-economic implications and financial costs, testing, impacts on recycling, supply chains, compliance costs, and any potential trade or market implication.

31. The EU has recently implemented UTC limits for Dechlorane Plus, comprising a two-stage reduction (outlined below).

*The EU has introduced a staggered approach to UTC limits for Dechlorane Plus being present in substances, mixtures and articles as follows:*

*i. equal to or below 1,000 mg/kg (0.1 per cent by weight) where they are present in substances, mixtures or articles until 15 April 2028.*

*ii. equal to or below 1 mg/kg (0.0001 per cent by weight) where they are present in substances, mixtures or articles after 15 April 2028.*

Would this UTC approach be suitable for equivalent implementation in GB?

a. Yes
b. No
c. Don't know
d. Prefer not to say

Please explain the reasons for your answer, including any supporting evidence or information on the approach's suitability for GB and any impact that might result from different UTC limits being applied in GB and NI for this substance. This may include information regarding technical feasibility, potential socio-economic implications and financial costs, testing, impacts on recycling, supply chains, compliance costs, and any potential trade or market implication.

# Proposed amendments to the current entry for an existing POP (PFOS)

## Overview

We are proposing to make some minor amendments to the existing listing for PFOS, including amendments to UTC limits. UTC limits provide industry with clarity while aligning with the UK's commitments as a Party to the Stockholm Convention to eliminate, prohibit or restrict chemicals listed as POPs.

In developing these proposals, Defra has reviewed analysis compiled by the European Chemicals Agency (ECHA) along with experts in the Environment Agency (EA). This analysis and its findings were deemed relevant and appropriate within a GB context, resulting in proposed amendments to the listing for PFOS.

## Proposed amendments

### Policy Options

- **If we do nothing:**
  - Current PFOS entry remains the same, including current UTC limits
- **Lead option -** implement amendments to PFOS entry as outlined in the below table and as set out in the accompanying draft SI.
  - UTC limits for this substance are reduced; and an outdated reference is removed.

### Supporting evidence for lead option

The proposed interventions on the existing entry for PFOS provide clarity and ensure the Regulations are operable and relevant in a GB context, following advances in our understanding on this substance. They reflect scientific and technical progress by lowering UTC limits in line with improved analytical capability and updated understanding of PFOS risks. They also remove the European Committee for Standardisation (CEN) reference, which is now outdated and unnecessary for operability in a GB-only regulatory context.

There are no known intentional uses of these substances in UK.

The proposed amendments to the UTC limits lower the threshold where these substances can be present unintentionally in substances, mixtures, or articles. The proposed updated UTC limits have already been introduced in EU, entering into force in 2025 and applying in NI.

We also propose removing from the PFOS entry an existing reference that is no longer relevant to a GB context.

## Proposed amendments to the PFOS listing

| Section of PFOS entry in Annex I of the POPs Regulation | Current text | Proposed change |
|---|---|---|
| Point 1 in column 4 | For the purposes of this entry, point (b) of Article 4(1) shall apply to concentrations of PFOS equal to or below 10 mg/kg (0.001 per cent by weight) where it is present in substances or in mixtures. | For the purposes of this entry, Article 4(1)(b) shall apply where the sum of the concentrations of PFOS and any of its salts present in a substance, mixture or article is equal to or below 0.025 mg/kg (0.0000025 per cent by weight). |
| Point 2 in column 4 | For the purposes of this entry, point (b) of Article 4(1) shall apply to concentrations of PFOS in semi-finished products or articles, or parts thereof, if the concentration of PFOS is lower than 0.1 per cent by weight calculated with reference to the mass of structurally or micro-structurally distinct parts that contain PFOS or, for textiles or other coated materials, if the amount of PFOS is lower than 1 µg per $m^2$ of the coated material. | For the purposes of this entry, Article 4(1)(b) shall apply where the sum of the concentrations of PFOS-related compounds present in a substance, mixture or article is equal to or below 1 mg/kg (0.0001 per cent by weight) |
| Point 5 in column 4 | Once standards are adopted by the European Committee for Standardisation (CEN) they shall be used as the analytical test methods for demonstrating the conformity of substances, mixtures and articles to points 1 and 2. Any other analytical method for which the user can prove equivalent performance could be used as an alternative to the CEN standards. | *To be deleted* |

## Consultation questions

32. To what extent do you agree or disagree with the proposed reduced UTC limit for PFOS to 0.025mg/kg (0.0000025 per cent by weight) for PFOS or any of its salts and to 1mg/kg (0.0001 per cent by weight) for PFOS-related compounds?
    a. Strongly Agree
    b. Agree
    c. Neither agree nor disagree
    d. Disagree
    e. Strongly Disagree
    f. Don’t know
    g. Prefer not to say

    Please explain the reasons for your answer, including any supporting evidence or information on why you think the proposed limits are or are not suitable for GB and any potential financial impacts or impacts arising from differences in how the EU and GB apply their respective limits.

    You may find the following supplementary information helpful to your response:
    *The EU implemented these changes through delegated regulation (EU) 2025/718 which came into force in the EU on 17 July 2025, which applies to NI.*

33. To what extent do you agree or disagree with the removal of point 5 of the PFOS listing?
    a) Strongly Agree
    b) Agree
    c) Neither agree nor disagree
    d) Disagree
    e) Strongly Disagree
    f) Don’t know
    g) Prefer not to say

    Please explain the reasons for your answer including any supporting evidence or information.

# Policy considerations beyond the draft Statutory Instrument (SI)

The following sections of the consultation do not directly refer to the contents of the accompanying draft SI. For these sections we are instead seeking views and evidence regarding other areas linked to the prohibition of substances under Annex I of our assimilated POPs Regulation.

## Seeking information regarding potential implications of recent EU Amendments to UTC limits for existing POPs (PBDEs)

### Overview

The EU have recently amended their UTC limits for existing POPs polybrominated diphenyl ethers (PBDEs), where PBDEs refers collectively to the substances tetrabromodiphenyl ether (tetraBDE), pentabromodiphenyl ether (pentaBDE), hexabromodiphenyl ether (hexaBDE), heptabromodiphenyl ether (heptaBDE) and decabromodiphenyl ether (decaBDE).

These amendments were adopted in July 2025 and apply to NI. The relevant current EU position following these amendments is outlined in the below table, alongside an outline of the current equivalent position in GB. Further information on the EU amendments can be found on the European Commission's Have Your Say website, including stakeholder responses to their 4-week consultation held in early 2025.

We are seeking information to help identify potential suitability of similar limits being introduced for GB, either in the shorter or longer term. We are also seeking information to help identify potential implications of ongoing differing UTC limits between GB and NI for these substances.

## Table outlining current PBDE UTC limits in GB and in EU and NI

| POPs Regulation i.e. applies to GB | | EU POPs Regulation following 2025 amendments i.e. applies to NI and EU | |
|---|---|---|---|
| **UTC limit for PBDEs** | **Applies when?** | **UTC limit for PBDEs** | **Applies when?** |
| 10 mg/kg (i.e. 0.001 per cent by weight)<br><br>For *each* of the following substances: tetra-, penta-, hexa-, hepta- and deca-BDE | Where they are present in substances | 10 mg/kg<br><br>For the *sum* of the concentrations of the following substances: tetra-, penta-, hexa-, hepta- and deca-BDE | Where they are present in mixtures or articles, except for food contact materials (subject to Regulation (EC) No 1935/2004) |
| 500 mg/kg<br><br>For the *sum* of the concentrations of the following substances: tetra-, penta-, hexa-, hepta- and decaBDE | Where they are present in mixtures or articles | For the *sum* of the concentrations of the following substances: tetra-, penta-, hexa-, hepta- and deca-BDE<br><br>500 mg/kg as of July 2025;<br><br>dropping to 350 mg/kg as of 30 December 2025;<br><br>and dropping to 200 mg/kg as of 30 December 2027. | Where they are present in mixtures or articles containing or made of recovered material containing tetra-, penta-, hexa-, hepta- or decaBDE, except for food contact materials (subject to Regulation (EC) No 1935/2004) |
| | | For the *sum* of the concentrations of the following substances: tetra-, penta-, hexa-, hepta- and decaBDE<br><br>500 mg/kg as of July 2025, | Where they are present in toys (subject to Directive 2009/48/EC), or in any product facilitating children's seating, sleep, relaxation, hygiene, changing and general body care, feeding, sucking, transportation and protection, containing or made of recovered material |

| | | | |
|---|---|---|---|
| | | Dropping to 350 mg/kg as of 30 December 2025;<br><br>And dropping to 10 mg/kg as of 17 May 2027. | containing tetra-, penta-, hexa-, hepta- or decaBDE, except for food contact materials (subject to Regulation (EC) No 1935/2004) |

## Consultation questions

34. Please use this space to provide any evidence or information on the potential suitability of the EU's amended PBDE UTC limits for equivalent implementation in GB.
You may wish to comment on technical feasibility, socio-economic and financial impacts, implications for recycling, supply chain, trade or market impacts and compliance costs.

35. Please use this space to provide any evidence or information you can on the potential implications of long-term differences between GB and NI relating to UTC limits for these substances. Consider impacts on recycling, supply chains, compliance costs, and potential trade or market implications.

36. What impacts in Northern Ireland do you anticipate arising from the application of the EU's amended PBDE UTC limits? Please provide any evidence on:
    - Effects on supply chains involving NI.
    - Recycling and waste-recovery operations.
    - Compliance costs.
    - Trade or internal market implications.
    - Impacts on manufacturers, importers or re-processors operating across GB and NI.
    - Any other operational, financial or environmental impacts.

# Seeking views on information generation and engagement on substances nominated as potential new POPs

## Overview

At its 21st meeting in September 2025, the Stockholm Convention's POPs Review Committee (POPRC) considered how to improve its processes for generating information and engaging stakeholders on nominated substances that are being evaluated as potential POPs. POPRC aims to strengthen how socio-economic considerations are identified and incorporated into the evaluation process. Further information on the POPRC evaluation process is available on the Stockholm Convention website.

The five new POPs included in this consultation have all previously been through the POPRC evaluation process and subsequent Convention decision-making. These processes involved several opportunities for stakeholder engagement - both nationally and internationally - over multiple years and at different evaluation stages.

A further group of substances called polybrominated dibenzo-p-dioxins and dibenzofurans (PBDD/Fs) and polybrominated/chlorinated dibenzo-p-dioxins and dibenzofurans (PBCDD/Fs), nominated in 2024, are currently undergoing evaluation, and additional substances are expected to follow in the future.

During the current intersessional period, POPRC is considering how its processes could be improved to:

- Ensure earlier and more effective engagement with relevant stakeholders.
- Gather up-to-date information on uses, supply chains and potential impacts of global prohibition.
- Better identify socio-economic considerations that may inform global decision-making.

Your responses to the questions below will help inform the UK Government's position in advance of further Convention-level discussions.

### Consultation questions

37. With reference to the above overview section, please use this space to highlight potential ideas to improve the Convention's future evaluation and engagement processes regarding substances that have been nominated as POPs under the Convention. Provide justification where possible.

38. With reference to the above overview section, please use this space to highlight potential ideas to improve the UK Government's future evaluation and engagement processes regarding substances that have been nominated as POPs under the Convention. Provide justification where possible.

## Additional questions on equality impacts and administrative burdens

### Consultation questions

39. Please use the space below to provide any information you have on any anticipated administrative burdens associated with complying with these proposed amendments to the assimilated POPs Regulation. This could include time required for familiarisation, completing forms, and passing information along supply chains. Please share any recommendations you can to help us reduce or minimise such costs.

40. Please use the space below to provide any information or evidence about whether the proposals in this consultation are likely to have impacts (positive or negative) on people with protected characteristics under the Equality Act 2010. (Protected characteristics include age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.)

# Any other comments or evidence

### Consultation questions

41. Please use the space below to highlight any other potential amendments we should consider to existing POPs entries to Annex I of the assimilated POPs Regulation. This could include amendments to currently available specific exemptions and / or UTC limits. Please provide justification and any supporting evidence or information, including on technical feasibility, socio-economic or financial impacts, implications for supply chains, recycling or waste management, and any potential trade or market impacts.

42. Please use the space below if you have any other comments or evidence that you would like to share relating to this consultation.

# Annex - Glossary of POPs substances and other acronyms

| Term | Meaning |
|---|---|
| **DecaBDE** | Decabromodiphenyl ether – a PBDE already regulated as a POP |
| **Dechlorane Plus** | Polychlorinated flame retardant (includes syn- and anti-isomers); newly listed POP |
| **HeptaBDE** | Heptabromodiphenyl ether – a PBDE already regulated as a POP |
| **HexaBDE** | Hexabromodiphenyl ether – a PBDE already regulated as a POP |
| **LC-PFCAs** | Long-chain perfluorocarboxylic acids (C9–C21), including their salts and related compounds. Newly listed POPs |
| **MCCPs** | Medium-chain chlorinated paraffins (C14–C17 chloroalkanes with ≥45 per cent chlorine by weight). Newly listed POP |
| **PBDEs** | Polybrominated diphenyl ethers – flame retardants (collective definition referring to: tetraBDE, pentaBDE, hexaBDE, heptaBDE, decaBDE) |
| **PentaBDE** | Pentabromodiphenyl ether – a PBDE already regulated as a POP |
| **PFAS** | Per- and polyfluoroalkyl substances – a broad class of fluorinated chemicals including some POPs |
| **PFHxS** | Perfluorohexane sulfonic acid, its salts and related compounds – already regulated as a POP |
| **PFOA** | Perfluorooctanoic acid – already regulated as a POP |
| **PFOS** | Perfluorooctane sulfonic acid, its salts and related compounds – already regulated as a POP with amended thresholds |
| **POPs** | Persistent Organic Pollutants – persistent, bioaccumulative, toxic chemicals capable of long-range environmental transport |
| **PTFE** | Polytetrafluoroethylene – a fluoropolymer in which LC-PFCA residues may occur; subject to specific UTC limits |

| | |
|---|---|
| **TetraBDE** | Tetrabromodiphenyl ether – a PBDE already regulated as a POP |
| **UVCB** | Substance of Unknown or Variable composition, Complex reaction products or Biological materials – applies to MCCPs |
| **UV-328** | Benzotriazole UV absorber used in plastics, coatings and adhesives; newly listed POP |
| **UTC** | Unintentional Trace Contaminant limit – maximum allowable concentration of a POP when present unintentionally |

| Glossary of other acronyms | |
|---|---|
| **Term** | **Meaning** |
| **AL (Authorisation List)** | The UK REACH list of substances requiring authorisation for use |
| **CEN** | European Committee for Standardisation |
| **Cefas** | Centre for Environment, Fisheries and Aquaculture Science |
| **COP** | Conference of the Parties to the Stockholm Convention |
| **DAERA** | Department of Agriculture, Environment and Rural Affairs (Northern Ireland) |
| **EA** | Environment Agency (England) |
| **ECHA** | European Chemicals Agency |
| **EIP** | Environment Improvement Plan |
| **EU** | European Union |
| **FSA** | Food Standards Agency (England, Wales, Northern Ireland) |
| **GB** | Great Britain (England, Scotland, Wales) |
| **HSE** | Health and Safety Executive |
| **IVD or IVDD** | In-vitro diagnostic devices |
| **LCD** | Liquid crystal display |
| **mg/kg** | Milligrams per kilogram (parts per million) |
| **MRL** | Maximum Residue Level (for pesticides) |
| **NGO** | Non-governmental organisation |
| **NI** | Northern Ireland |

| | |
|---|---|
| **NIEA** | Northern Ireland Environment Agency |
| **NRW** | Natural Resources Wales |
| **PFAS** | Per- and polyfluoroalkyl substances (also appears above) |
| **PIC** | Prior Informed Consent (hazardous chemicals export control regime) |
| **POPRC** | POPs Review Committee under the Stockholm Convention |
| **REACH** | Registration, Evaluation, Authorisation and Restriction of Chemicals (UK or EU context) |
| **SEPA** | Scottish Environment Protection Agency |
| **SI** | Statutory Instrument |
| **UKG** | United Kingdom Government |
| **UKHSA** | UK Health Security Agency |
| **mg per m²** | milligrams per square metre |