

Response ID ANON-75K5-1Z6A-E

Submitted to Consultation on potential amendments to the Persistent Organic Pollutants (POPs) Regulation
Submitted on 2023-04-27 08:07:06

About you

1 Would you like your response to be confidential? (Required)

Yes (please give a reason for your answer below)

Reason for confidentiality:

Due to the nature of our business we would like the response to remain confidential.

2 What is your name?

What is your name?:

(Redacted) (Redacted)

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.

Email address:

(Redacted) @ (Redacted) .com

4 Are you responding as an individual or on behalf of an organisation?

Organisation

5 What type of organisation are you responding on behalf of?

A government body

Other:

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

organisation name:
Sellafield Ltd

7 Where in the UK are you/your organisation based and/or in operation? (tick all that apply)

England

Waste limits (x) - Other POPs

71 Are you aware of any evidence to suggest that any of the other waste concentration limits listed in the POPs Regulation should be amended in upcoming or future legislation? Please provide details if so, including with reference to specific substances, data sources, timescales, tonnages impacted and potential financial costs (including incineration gate fees, administrative costs or time taken to familiarise with the requirements and sourcing disposal, testing, segregation, storage of wastes), if known.

Are you aware of any evidence to suggest that any of the other waste concentration limits listed in the POPs Regulation should be amended in upcoming or future legislation? Please provide details if so, including with reference to specific substances, data sources, timescales, tonnages impacted and potential financial costs (including incineration gate fees, administrative costs or time taken to familiarise with the requirements and sourcing disposal, testing, segregation, storage of wastes), if known. :

No, we are not aware of any other evidence that suggests any other changes. Not sure how the supply chain is set up to handle any changes in limits for POP's especially for controlled wastes.

SECTION TWO: Removal of existing specific exemptions (or 'derogations') for four POPs

72 Are any of the exemptions proposed for removal of particular importance to you and/or the organisation you represent?

I don't know;

73 If you checked any of the exemptions in question 72, please specify how their removal would impact you or your organisation

If you checked any of the exemptions in question 72, please specify how their removal would impact you or your organisation:

n/a

74 To what extent do you agree or disagree with our proposed position (removal of the above-listed exemptions)?

I'd prefer not to say

75 Please explain the reasons for your answer to question 74, with reference to evidence and/or possible alternative options where relevant

Please explain the reasons for your answer to question 74, with reference to evidence and/or possible alternative options where relevant:

n/a

76 Are you/your organisation currently making use of any of these exemptions?

exemptions still being used - (i) PFOS exemption 4:

No

exemptions still being used - (ii) SCCPs exemption 1:

No

exemptions still being used - (iii) PFOA exemption 5e:

No

exemptions still being used - (iv) PFOA exemption 7:

No

exemptions still being used - (v) DecaBDE exemption 3(a):

No

exemptions still being used - (vi) DecaBDE exemption 3(b)(i):

No

77 If you/your organisation are still making use of this exemption(s), what efforts are being made to transition away from reliance on this substance and this exempted use? If multiple substances and/or exemptions: please detail for each one. In your answer, you may like to refer to why this exemption is still required, the estimated quantity of production and/or use of this substance, potential alternative substances and/or approaches, why an alternative substance or approach cannot be used, and the practicalities and/or costs of transition.

If you/your organisation are still making use of this exemption, what efforts are being made to transition away from reliance on this substance and this exempted use? If multiple substances and/or exemptions: please detail for each one. In your answer, you may like to refer to why this exemption is still required, the estimated quantity of production and/or use of this substance, potential alternative substances and/or approaches, why an alternative substance or approach cannot be used, and the practicalities and/or costs of transition. :

n/a

78 If you/your organisation are still making use of this exemption, when do you anticipate no longer requiring use of this exemption? If multiple substances and/or exemptions: please detail for each one.

If you/your organisation are still making use of this exemption, when do you anticipate no longer requiring use of this exemption? If multiple substances and/or exemptions: please detail for each one. :

n/a

Any other comments or evidence to share?

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

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

How much consideration has been made to the supply chain and the subsequent knock on in terms of managing wastes containing POP's once these changes are made. Are we set up to manage the change to ensure that we are continuing to do the right thing in terms of disposals via BAT's and following the WMH?

Consultee Feedback on the Online Survey

111 Overall, how satisfied are you with our online consultation tool?

Neither satisfied nor dissatisfied

112 Please give us any comments you have on the tool, including suggestions on how we could improve it.

Please give us any comments you have on the tool, including suggestions on how we could improve it. :

n/a