



CHEMICAL INDUSTRY LIAISON GROUP MEETING (CILG)

20th March 2024 (CBA Offices Crewe)
(10:00 – 13:00)

Attendees: [REDACTED] (CBA) [REDACTED] (SIA) [REDACTED] (UKCPI) [REDACTED], [REDACTED] (EA); [REDACTED] (NRW) [REDACTED] (BAMA) Hybrid: [REDACTED] (ABPI) [REDACTED] (BCA) [REDACTED] (BCF) [REDACTED] (CIA)	Apologies: [REDACTED] (CBA) – Reg Affairs [REDACTED] (EA) [REDACTED] (IFRA) [REDACTED] (TSA) [REDACTED] (BCGA) – new membership of the Group. SEPA – await a new chemicals rep. (minutes cc'd to [REDACTED] / [REDACTED]).
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Item	Actions	Person Responsible
Overview	Meeting was a Hybrid meet at the CBA, Crewe.	As doodle poll
	The British Compressed Gases Association have now joined the CILG. Membership attached in appendix.	
Presenters: (30mins)	[REDACTED] (EA Chemical Compliance Team) presented on the current PFAS project which aims to get intelligence on main sources of PFAS in UK. They are using a GIS mapping tool for sources, to better understand risks from PFAS across areas of the country. Action – a proforma and guidance document will be sent out to EPR chemical sites from pan-area teams. (The documents have been finalised and will be attached to these minutes). Responses to the email mail box set up for this project). Feedback after full review of data. Autumn 2024.	[REDACTED] presented on PFAS. Intelligence required. 3 docs have been prepared. Will forward to CILG.
	 PFAS guidance and proforma - cover letter  Guidance Chemicals Sector Final.pdf  PFAS Proforma FINAL.xlsx	Docs attached. Any intelligence from CILG

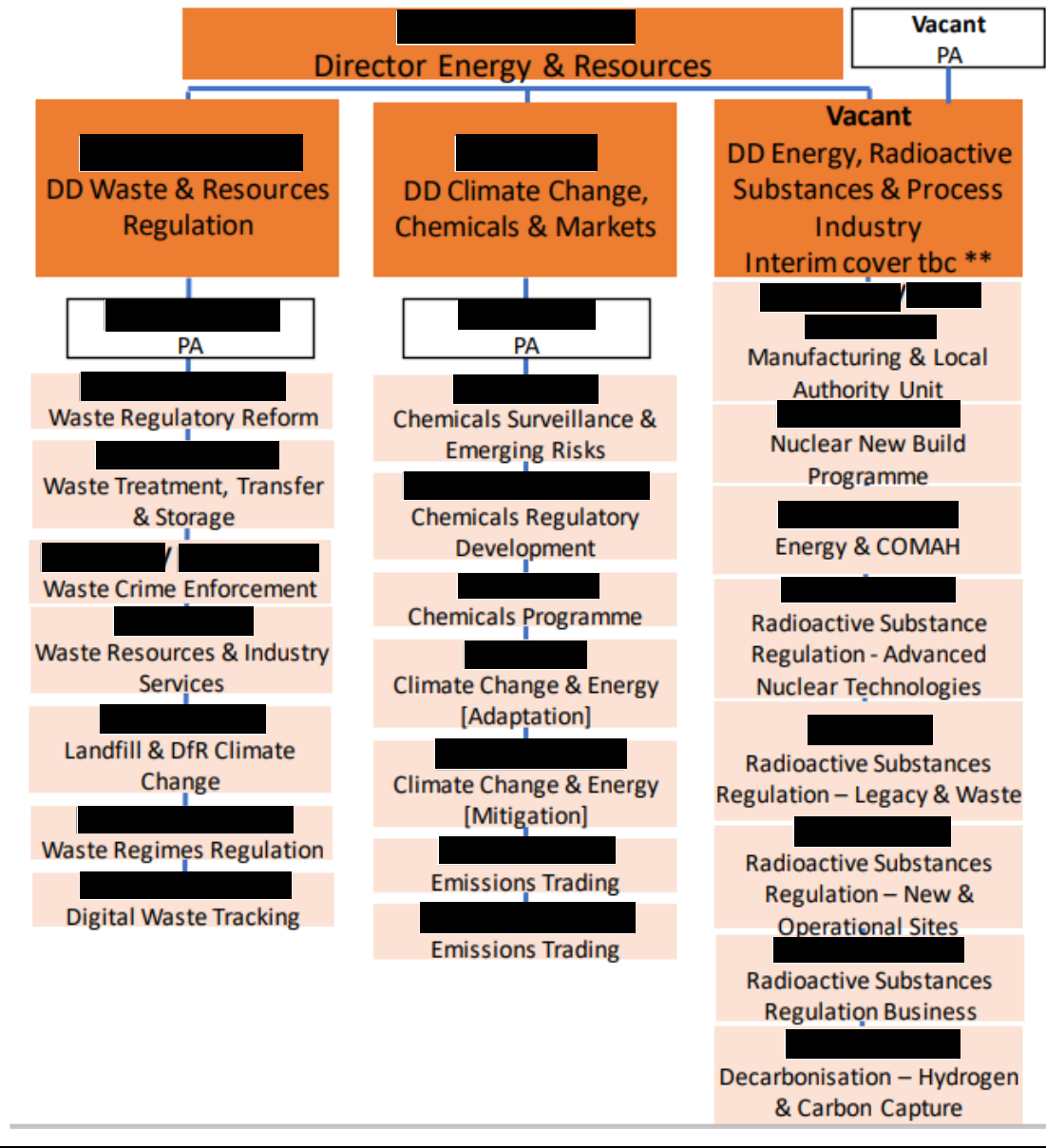
		would be helpful.
	Horizon scanning: This is a carry over from 2023, and is still being tabled as a workshop idea for a future date. [REDACTED] previously facilitated a horizon scanning exercise (2019).	Action: [REDACTED] / various EA people to coordinate and set a date.
Members Updates and links	Tank Storage Assoc (TSA) Presentation on FFF in industry PowerPoint Presentation (tankstorage.org.uk)	Last Fire presentation
UK BAT	WGC UK BAT conclusions update: The final version of the WGC document was sent out in early 2024 and comments are requested by 15 April 2024. The Impact Assessment is still outstanding, and CIA are helping UK BAT team with this. This may delay publication? Unknown at this time. Progress will follow after sign off by Standards Council, and Ministers. Large Volume Inorganic Chemicals to follow in 2024.	
Hydrogen Development	As part of the rapidly developing area and the UK hydrogen strategy, the UK regulators have recently published a new GET guidance document: On 28th March 2024 the Environment Agency on behalf of the UK environmental regulators* has today published new guidance and a supporting evidence review on GOV.UK. Please find the link to the guidance: Hydrogen production by electrolysis of water: emerging techniques Links are provided in the guidance to the supporting evidence review: Review of emerging techniques for hydrogen by electrolysis of water The guidance is for: ▪ Operators when designing their plants and preparing their application for an environmental permit ▪ Environmental regulators when determining environmental permit applications ▪ Any other organisation or members of the public who want to understand how the environmental regulations and standards are being applied. Further work in consultation with stakeholders will be needed to develop any future specific UK BAT standards and regulatory requirements.	

Regulators Update	EA - changes in management: New head office structure announced. Organogram was shown. The DD [REDACTED] will become Chief Regulator. So reorganisation of some senior managers is being carried out atm. Also, [REDACTED] - Energy Manager. New IT system for permitting may result in a single EA permit invoice system. PI data check – Chemical returns 80-90% asked for returns. Any synergies with EA training schemes etc. IChemE Placements across England (6 this year). Work ongoing with alignment with Chartered Status. NRW – see below for detail. SEPA – Our SEPA rep ([REDACTED]) recently left to [REDACTED] [REDACTED] [REDACTED]	
Membership Issues:	1. UK REACH – current ongoing HSE consultation on this from November 2023. 2. UK BAT implementation for sector 3. Energy costs: still a major issue post-pandemic. 4. IED (2) – Europe is reviewing future BREF strategy for ongoing work programme. 5. CIA – [REDACTED] will be replacing [REDACTED] who is [REDACTED] [REDACTED] 2 new responsible care reps are being recruited. 6. CIA also working with Water Resources Policy with EA / DEPFRA on water use, and efficiency (resilience approach, energy UK, agriculture with various national people). 7. Waste Issues – Producer Responsibility and PRN business waste. This was mentioned several times by trade associations. EPR and wider implications here. 8. ABPI - PIE - relating to water discharges. Participating in Europe via trade association. 9. Chemical Strategy in UK v Europe (DEFRA led) – in progress. 10. Biocide issues for water treatment chemicals and REACH for registration and use. 11. BAMA – CLP and REACH issues on product safety and packaging waste for aerosols (HSE related). 12. SIA – Mentioned a relevant NMVOC publication via the SIA European website which may be of interest;	EA/Regulators have a request for intelligence on supply chain issues from trade Assoc.

	ethanol closure announcement, low demand and continued financial pressure. 13. BCF – Paints/Coatings: netzero roadmap to support members to 2050; paint care initiative with retailers; waste minimisation. Producer Responsibility care with new guidance for members. Biocides/PFAS interest also. 14. UKCPI – Members are feeling the cumulative effects of regulation (e.g. plastics tax), burden on members, SMEs in UK and Ireland particularly: detergent regulations, restrictions on dosing of phosphorus, and biodegradability of surfactants etc. 15. Microplastics in Environment.	
NRW update from 	A few notes for the minutes covering my update: - NRW launched Our Corporate plan in Summer 2023, see link below. This corporate plan builds on our experience and learning over the last decade, and setting out our priorities to 2030 and outlines three wellbeing objectives: - nature's recovery - resilience to climate change - minimising pollution Natural Resources Wales / Our corporate plan to 2030 - Nature and People Thriving Together - We consulted on our proposals to update the charges for some of our permits, licences and compliance activities for 2024/25 earlier this year. You can find the full charging proposals, see link below. Consultation on our regulatory fees and charges for 2024/2025 - Natural Resources Wales Citizen Space - Citizen Space (cyfoethnaturiol.cymru) Following a separate consultation, we retired our Operational Risk Assessment tool (Opra) for determining permit application charges. From 15th January 2024 all applications that would previously have needed an Opra score to proceed will need to use the new charge banding tool to calculate the charge payable. See link for details: Consultation Response Document DRAFT V05 (cyfoethnaturiol.cymru) - Our budget planning process for 2024/25 is nearing completion, even though we understand our budget to be at a similar level to previous years, in reality our buying power is reduced. In simple	

	terms our costs have risen, so our money will not go as far. We estimate that the same amount of money buys 20-25% less than it did pre-COVID. The implications for staffing levels are still in determination and will be approved by our Board in early spring, however, the operational teams are well resourced as of the start of 2024. Next meeting will be hybrid TEAMS call on 5 June 13:30 to 15:30. Next face to face meeting will be Thur 3rd October at [REDACTED] [REDACTED] – say 10:30 to 14:30 ([REDACTED] will organise).	[REDACTED] to arrange meeting [REDACTED] [REDACTED]
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Environment Agency – new structure from 1st April 2024 with Chemicals within Manufacturing and Local Authority Unit Team – [REDACTED] / [REDACTED].



Trade Associations on CILG

ABPI (association of british pharmaceutical industries)	<u>ABPI</u>
BCA (british chemicals association)	<u>BCA</u>
BAMA (british aerosol manufacturers association)	<u>BAMA</u>
BCGA (British compressed gases association)	<u>BCGA</u>
BCF (british coatings federation)	<u>BCF</u>
CBA (chemical business association)	<u>CBA</u>
CIA (chemicals industry association)	<u>CIA</u>
IFRAUK (international fragrance association)	<u>IFRA</u>
SIA (solvent industries association)	<u>SIA</u>
TSA (tank storage association)	<u>TSA</u>
UKCPI (The UK Cleaning Products Industry Association)	<u>CPI</u>