

Submitted to Consultation on potential amendments to the Persistent Organic Pollutants (POPs) Regulation
Submitted on 2023-04-27 15:12:47

About you

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

No

Reason for confidentiality:

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) @ .gov.uk

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?

Local authority

Other:

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

organisation name:
Cambridgeshire County Council

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

England

Waste limits (i) - Perfluorooctanoic acid (PFOA)

8 Is this proposal of particular importance to you and/or the organisation you represent?

Yes (please specify how below)

How would this change impact (PFOA WL (i)):

Any POPs proposal that relates to materials and waste types that appear in municipal waste or has the potential to appear in municipal waste as a result of implications to waste from other sectors, i.e., commercial and construction & demolition waste, is important to Cambridge County Council so that they can understand the requirements for dealing with them, and the associated impacts on the segregation of materials, the compliant disposal routes and the associated treatment and handling costs to come into compliance with the legislation and guidance.

These proposals will place additional costs on Cambridgeshire County Council and our partner organisations. We believe that DEFRA should consider the "polluter pays" principle of environmental legislation and would request the introduction of a producer compliance scheme that places the cost of managing these waste streams on the producers and retailers that put these chemicals into their products rather than local authorities that are left to dispose of them.

We receive significant quantities of C&D waste through our HRCs which is all recycled/used for restoration. If this must go to HTI in future this will add significant cost and could impact on our recycling/residual diversion performance and Waste PFI grant payments if recycling levels fall.

Defra has consulted on proposals that, if introduced, could significantly increase that amount of C&D waste received at HRCs and increase the cost impacts on councils that handle this waste.

If the proposal is that all C&D waste is sent to HTI/EfW there may be insufficient incinerator capacity to treat the waste. The incinerator operators will be reluctant to accept C&D waste with a low CV and low energy generating potential that could create significant quantities of bottom ash and impact on air pollution controls. If HTI/EfW operators are reluctant to receive this waste, they will charge high gate fees to overcompensate for their additional costs and any additional risks this brings compared to their preferred feedstock.

9 To what extent do you agree or disagree with our proposed waste limit for PFOA (1mg/kg for PFOA and its salts (or 0.025 mg/kg in AFFF); 40mg/kg for PFOA related compounds (or 1 mg/kg in AFFF))?

Agree

10 Please explain the reasons for your answer to question 9, with reference to evidence and/or possible alternative options where relevant

Explain sentiment PFOA WL (i):

The evidence presented in Annex A supports setting the limit for PFOA at the proposed limit(s) which will ensure the requirements for all aqueous film forming foams to be destroyed via high temperature incineration are met. We understand that there is limited, if any, capacity for additional high temperature incineration in the UK and agree this approach would minimise the impact on this issue.

Cambridge County Council, (CCC) supports the key principle of the Stockholm Convention (and thus the POPs Regulations) to protect human health and the environment from the impacts of chemicals that remain intact in the environment for long periods. We would want to ensure the most appropriate limit is set to safeguard all aspects of the environment (and human health). We wish to better understand the links between limits set for waste and other elements (i.e., food, water, soil, animals, air) to ensure any proposed waste concentration limit does not impact on concentration limits detected elsewhere and potentially run the risk of creating repercussions for the waste industry at a later date.

Where there is evidence which identifies links between waste concentration limits and impacts on concentration limits to other aspects of the environment, we propose an alternative waste concentration limit that is lower than 1mg/kg and aligns with other existing limits for PFOA in other elements. We understand that this potentially has implications for the waste industry by including more waste streams affected by this limit and would require collaboration with the Environment Agency and Defra (and other relevant parties) to ensure there is sufficient time and funding made available to support the transition in dealing with these waste streams appropriately.

11 There is a lack of concentration data for PFOA in waste in the UK so our assessment carries a level of uncertainty. Our evidence-based judgement is that PFOA is unlikely to be found at a level exceeding 1mg/kg in waste (excluding firefighting foams and hydraulic fluids). Are you aware of any evidence to suggest other sectors and/or products where PFOA would fall above or below the proposed waste concentration limit level? Please provide details if so including with reference to tonnages, concentration levels, ability to segregate waste, and impacts where possible.

There is a lack of concentration data for PFOA in waste in the UK so our assessment carries a level of uncertainty. Our evidence-based judgement is that PFOA is unlikely to be found at a level exceeding 1mg/kg in waste (excluding firefighting foams and hydraulic fluids). Are you aware of any evidence to suggest other sectors and/or products where PFOA would fall above or below the proposed waste concentration limit level? Please provide details if so including with reference to tonnages, concentration levels, ability to segregate waste, and impacts where possible.:

We are not aware of any evidence on levels of PFOA in waste as the requirement to identify and measure levels of PFOA to this level of detail in waste streams has not been appreciated by the waste industry. We do not carry out detailed chemical analysis on every single item of waste that we receive for recycling, treatment, and disposal so are not aware of other waste streams where this chemical may be present.

12 There are expected to be one-off impacts for organisations who hold PFOA containing waste to familiarise themselves with the new regulations and procedures, and the time taken to source appropriate disposal routes. Are you aware of how long (in hours) this will take, and any costs incurred? Please provide details if so.

There are expected to be one-off impacts for organisations who hold PFOA containing waste to familiarise themselves with the new regulations and procedures, and the time taken to source appropriate disposal routes. Are you aware of how long (in hours) this will take, and any costs incurred? Please provide details if so. :

It is not possible to provide the number of hours required for this activity as it will vary depending on the circumstances for Cambridgeshire County Council and the information / guidance that is available.

Several activities need to be undertaken including but not limited to:

- Reviewing guidance and to understand requirements to achieve compliance.
- Considering the implications of changes required in relation to both waste collection and waste disposal / processing contracts.
- Reviewing infrastructure to understand any changes that may be required.
- Contract re-negotiations/treatment solution re-procurement where necessary to ensure any changes are deliverable.
- Financial modelling to understand the costs associated with changes.
- Looking at the capacity to absorb these changes whilst making a case for additional resources to deal with this work.

The costs are not only affected by additional officer time in undertaking the different activities required, but this is also likely to involve several different departments dealing with different elements (financial, legal, operational etc..) and the time for each element will depend on the level of complexity of the changes.

As experienced with the work on dealing with Waste Upholstered Domestic Seating (WUDS) potentially containing POPs, any waste containing POPs that requires segregation from other waste streams is likely to demand greater collection and disposal costs when the way the waste is currently handled, stored, transported, treated, and disposed must change, particularly if demand for such requirements outstrips supply.

Arguably, the cost impacts would be on-going (when the waste containing POPs continues to be generated) for those affected organisations rather than a one-off, as they will continue to pay higher rates of disposal (than before) until the waste is proven to no longer contain the relevant POP (and assuming the replacement chemicals used are not identified as POPs in the future). There would be also on-going resource requirements to continue to manage and monitor this waste stream alongside other waste streams.

13 Are you aware of any other organisations that may be impacted by this proposal? Please provide details if so, including references to the number of organisations, types of organisations (Local Authorities, businesses, independent or public bodies), size (micro, small, medium or large), and the anticipated impacts, if known.

Are you aware of any other organisations that may be impacted by this proposal? Please provide details if so, including references to the number of organisations, types of organisations (Local Authorities, businesses, independent or public bodies), size (micro, small, medium or large), and the anticipated impacts, if known. :

Our five District Councils will be affected: South Cambridgeshire, Fenland, East Cambs, Cambridge City & Huntingdonshire as well as Peterborough City Council, (a unitary authority). Across the County bulky waste collections, housing associations, reuse organisations and charities, private waste management companies, repair and reuse businesses who generate this waste as well as producers and retailers of goods containing POPs. As with the case of any changes to waste-related services and legislation, there is a risk that affected waste types could end up in Cambridgeshire County Council waste management systems,

, either by:

- 1) where a business is seeking more cost-effective collection and disposal solutions (and the Local Authority offers a commercial waste collection service),
- 2) through fly-tipped collected waste (where it appears on public land),
- 3) household waste recycling centres are often viewed as the place of 'last resort' for disposing of items that are more challenging to dispose of.

14 For hydraulic fluids, are you aware of any evidence to suggest where PFOA falls above or below the proposed waste concentration limit level? Please provide details if so, including with reference to tonnages, concentration levels, ability to segregate waste and other impacts where possible.

For hydraulic fluids, are you aware of any evidence to suggest where PFOA falls above or below the proposed waste concentration limit level? Please provide details if so, including with reference to tonnages, concentration levels, ability to segregate waste and other impacts where possible. :

Not aware of any evidence.

15 The study team for the EU Impact Assessment suggest that detecting PFOA at a concentration limit of 1mg/kg is economically feasible. Are you aware of any evidence regarding potential financial cost to test and segregate waste streams at this level? Please provide details if so. Waste containing PFOA above the waste concentration limit will require high temperatures to destroy the POP, for example, in a hazardous waste incinerator or suitable cement kiln. Are you aware of any evidence regarding potential financial cost (gate fees) to destroy this waste? Please provide details if so

The study team for the EU Impact Assessment suggest that detecting PFOA at a concentration limit of 1mg/kg is economically feasible. Are you aware of any evidence regarding potential financial cost to test and segregate waste streams at this level? Please provide details if so Waste containing PFOA above the waste concentration limit will require high temperatures to destroy the POP, for example, in a hazardous waste incinerator or suitable cement kiln. Are you aware of any evidence regarding potential financial cost (gate fees) to destroy this waste? Please provide details if so :

Any form of laboratory testing is likely to come at a (significant) cost, subject to the requirements of developing statistically reliable results from samples of waste and may be considered impracticable to use at Cambridgeshire County Council waste management sites, depending on the techniques required and time taken to produce results. To the best of our knowledge, there are no well-established techniques currently used in the field to detect PFOA in waste samples.

Through our membership of NAWDO our understanding is that PFOA can be detected in the environment at a limit of less than 1mg/kg using various laboratory techniques such as Liquid Chromatography Tandem Mass Spectrometry. A ballpark figure provided by Hampshire Scientific Services for carrying out screening of a sample using this technique is approximately (Redacted) to quantify compounds contained in samples. There would be additional costs involved in preparing and extracting samples to test from waste loads, and further costs associated with the need to stockpile waste ahead of disposal until the sampling results come through (estimated time taken is 3 weeks plus).

Facilities that provide incineration at high temperature are limited in number, location and available capacity in England, Scotland, and Wales. It would be prudent to anticipate costs of more than £2,000/ tonne to dispose of waste via these facilities, (figures higher than this have also been mentioned).

Cambridgeshire County Council feel that residents should not be asked to pay for the disposal of this waste stream, but rather that the 'polluter pays' principle should be rapidly brought to the fore as part of DEFRA's implementation of the Stockholm Convention. The Resources and Waste strategy also made mention of New Burdens funding which should cover changes in waste disposal costs like this.

16 Do you have any further evidence to suggest the suitability, or otherwise, of introducing waste concentration limits specific to one type of waste (such as aqueous film forming foams (AFFF))? Please provide details if so.

Do you have any further evidence to suggest the suitability, or otherwise, of introducing waste concentration limits specific to one type of waste (such as aqueous film forming foams (AFFF))? Please provide details if so. :

No further evidence to offer support of suitability or introduction of waste concentration limits.

Waste limits (ii) - Perfluorohexane sulfonate (PFHxS)

17 Is this proposal of particular importance to you and/or the organisation you represent?

Yes (please specify how below)

Is this proposal of particular importance to you and/or the organisation you represent? :

Any POPs proposal that relates to material waste types that appear in municipal waste or has the potential to appear in municipal waste as a result of implications to waste from other sectors, i.e., commercial and construction & demolition, is important to Local Authorities to understand the requirements of them, and the associated impacts, to come into compliance with the law.

However, it is recognised that in all proposed options relating to waste concentration limits for PFHxS, it is only likely to affect hydraulic fluid waste from the aviation sector and is therefore unlikely to affect municipal waste managed by Cambridgeshire County Council.

18 To what extent do you agree or disagree with our proposed waste limit for PFHxS (1mg/kg for PFHxS and its salts; 40mg/kg for PFHxS related compounds)?

Agree

19 Please explain the reasons for your answer to question 18, with reference to evidence and/or possible alternative options where relevant

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

All proposed options relating to waste concentration limits for PFHxS are only likely to affect hydraulic fluid waste from the aviation sector and is therefore currently unlikely to affect municipal waste managed by Cambridgeshire County Council unless this changes in the future. If the waste limits were reduced significantly lower than what is proposed in all the options, we would require support in the form of time, technical expertise, and funding to develop methods for identifying PFHxS within clothing and carpet wastes and manage these waste streams appropriately. Currently Cambridgeshire County Council handles a significant amount of clothing, textiles and carpets, much of which ends up in landfill at the moment, (our latest waste composition analysis estimated that some 4.2% of our residual waste is thought to be textiles, which equates to around 5,000 tonnes per year, whilst for carpets and mattresses the figures, (from our the District bulky waste collections) is @around 31.8% which equates to around 3,800 tonnes per year. This could have quite a significant impact if all these items have to be tested/sent to HTI/EfW for disposal in future.

20 There is a lack of concentration data for PFHxS in waste in the UK so our assessment carries a level of uncertainty. Our evidence-based judgement is that PFHxS is unlikely to be found at a level exceeding 1mg/kg in waste (excluding firefighting foams/hydraulic fluids). Are you aware of any evidence to suggest other sectors and/or products where PFHxS would fall above or below the proposed waste concentration limit level? Please provide details if so, including with reference to relevant waste streams, tonnages, concentration levels, ability to segregate waste, and other impacts where possible.

There is a lack of concentration data for PFHxS in waste in the UK so our assessment carries a level of uncertainty. Our evidence-based judgement is that PFHxS is unlikely to be found at a level exceeding 1mg/kg in waste (excluding firefighting foams/hydraulic fluids). Are you aware of any evidence to suggest other sectors and/or products where PFHxS would fall above or below the proposed waste concentration limit level? Please provide details if so, including with reference to relevant waste streams, tonnages, concentration levels, ability to segregate waste, and other impacts where possible. :

We are not aware of any evidence on levels of PFHxS in waste as the requirement to identify and measure levels of PFHxS to this level of detail in waste streams has not been appreciated by the waste industry.

21 For hydraulic fluids, are you aware of any evidence to suggest where PFHxS falls above or below the proposed waste concentration limit level? Please provide details if so, including with reference to relevant waste streams, tonnages, concentration levels, ability to segregate waste, and other impacts where possible

For hydraulic fluids, are you aware of any evidence to suggest where PFHxS falls above or below the proposed waste concentration limit level? Please provide details if so, including with reference to relevant waste streams, tonnages, concentration levels, ability to segregate waste, and other impacts where possible :

Not aware of any evidence.

22 There are expected to be one-off impacts for organisations who hold PFHxS containing waste to familiarise themselves with the new regulations and procedures, and the time taken to source appropriate disposal routes. Are you aware of how long (in hours) this will take, and any costs incurred? Please provide details if so.

There are expected to be one-off impacts for organisations who hold PFHxS containing waste to familiarise themselves with the new regulations and procedures, and the time taken to source appropriate disposal routes. Are you aware of how long (in hours) this will take, and any costs incurred? Please provide details if so. :

It is not possible to provide a time for this activity as it will vary depending on the circumstances in our area and the information / guidance that is available.

Several activities will need to be undertaken including but not limited to:

- Reviewing guidance and to understand requirements to achieve compliance.
- Considering the implications of changes required in relation to both waste collection and waste disposal / processing contracts.
- Reviewing infrastructure to understand any changes that may be required.
- Contract negotiations/treatment solution re-procurement where necessary to ensure any changes are deliverable.
- Changes in Law to our current PFI Contract, (which have both financial and time implications).
- Financial modelling to understand the costs associated with changes.

The costs would be in officer time undertaking the different activities required, this is likely to involve a few officers dealing with different elements (financial, legal, technical, operational etc..) and the time for each element will depend on the level of complexity of the changes.

Arguably, the cost impacts would be on-going (when the waste containing POPs continues to be generated) for those affected organisations rather than a one-off, as they will continue to pay higher rates of disposal (than before) until the waste is proven to no longer contain the relevant POP (and assuming the replacement chemicals used are not identified as POPs in the future).

23 Are you aware of any other organisations that may be impacted by this proposal? Please provide details if so, including references to the number of organisations, types of organisations (Local Authorities, businesses, independent or public bodies), size (micro, small, medium or

large), and the anticipated impacts, if known.

Are you aware of any other organisations that may be impacted by this proposal? Please provide details if so, including references to the number of organisations, types of organisations (Local Authorities, businesses, independent or public bodies), size (micro, small, medium or large), and the anticipated impacts, if known. :

Our five District Councils will be affected: South Cambridgeshire, Fenland, East Cambs, Cambridge City & Huntingdonshire as well as Peterborough City Council, (a unitary Authority). Across the County bulky waste collections, housing associations, reuse organisations and charities, private waste management companies, repair and reuse businesses who generate this waste as well as producers and retailers of goods containing POPs. As with the case of any changes to waste-related services and legislation, there is a risk that affected waste types could end up in Cambridgeshire County Council waste management systems.

As with the case of any changes to waste-related services and legislation, there is a risk that affected waste types could end up in our waste management system, (which includes our bulky waste collections from Peterborough City and district council partners either by:

- 1) where a business is seeking more cost-effective collection and disposal solutions (and the Local Authority offers a commercial waste collection service),
- 2) through fly-tipped collected waste (where it appears on public land),
- 3) household waste recycling centres are often viewed as the place of 'last resort' for disposing of items that are more challenging to dispose of.

24 The study team for the EU Impact Assessment suggest that Limits of Detection of 1mg/kg is economically feasible. Are you aware of any evidence regarding potential financial cost to test and segregate waste streams at this level? Please provide details if so

The study team for the EU Impact Assessment suggest that Limits of Detection of 1mg/kg is economically feasible. Are you aware of any evidence regarding potential financial cost to test and segregate waste streams at this level? Please provide details if so :

Not aware of any techniques to detect PFHxS in waste samples, although should this be introduced there will be a significant cost implication.

25 Waste containing PFHxS above the waste concentration limit will require high temperatures to destroy the POP, for example, in a hazardous waste incinerator or suitable cement kiln. Are you aware of any evidence regarding potential financial cost (gate fees) to destroy this waste? Please provide details if so.

Waste containing PFHxS above the waste concentration limit will require high temperatures to destroy the POP, for example, in a hazardous waste incinerator or suitable cement kiln. Are you aware of any evidence regarding potential financial cost (gate fees) to destroy this waste? Please provide details if so. :

Facilities that provide incineration at high temperature are limited in number, location and available capacity in England, Scotland, and Wales. Research has shown that costs can be more than (Redacted) to dispose of waste via these facilities.

26 Do you have any further evidence to suggest the suitability, or otherwise, of introducing waste concentration limits specific to one type of waste (such as aqueous film forming foams (AFFF))? Please provide details if so.

Do you have any further evidence to suggest the suitability, or otherwise, of introducing waste concentration limits specific to one type of waste (such as aqueous film forming foams (AFFF))? Please provide details if so. :

No further evidence to offer support of suitability or introduction of waste concentration limits specific to one type of waste.

Waste limits (iii) - Short Chain Chlorinated Paraffins (SCCPs)

27 Is this proposal of particular importance to you and/or the organisation you represent?

Yes (please specify how below)

28 To what extent do you agree or disagree with our proposed waste limit for SCCPs (1,500 mg/kg)?

Neither agree nor disagree

29 Please explain the reasons for your answer to question 28, with reference to evidence and/or possible alternative options where relevant

Please explain the reasons for your answer to question 28, with reference to evidence and/or possible alternative options where relevant:

Answer to Question 27:

Any POPs proposal that relates to material waste types that appear in municipal waste or has the potential to appear in municipal waste as a result of implications to waste from other sectors, i.e., commercial and construction & demolition, is important to Local Authorities to understand the requirements of them, and the associated impacts, to come into compliance with the law.

The evidence presented in Annex A suggests that SCCPs may be present above the various proposed options for concentration limits in a number of different products which would appear in a number of different separate waste streams that Local Authorities manage; textiles, WEEE and paint, but also appear in waste streams that would typically contain a mixture of products; kerbside bulky waste, kerbside residual waste, hazardous waste and amenity waste. Assuming there would be requirements to segregate these items, it is important that we at Cambridgeshire County Council are aware of which specific products the revised waste concentration limits would capture, how they can be identified within waste streams (including how to identify products that have had the relevant adhesives, sealants and paints applied to them) and how they should be managed going forward.

Waste management infrastructure, such as Household Waste Recycling Centres (HWRCs) and Transfer Stations (WTs), have finite capacity and space, and

most are already exhausted in terms of use of space, number of containers and separate collection of different waste types that can be accommodated. Any additional requirements to segregate waste types will put further pressure on capacity limits to the point where new requirements cannot be accommodated, there is reduced capacity for managing existing separated waste types, other waste types are displaced to accommodate new requirements or significant investment is required to extend/ build new infrastructure.

Given the types of materials that SCCPs are potentially present in, it is also important to note that any new requirements for the destruction/ irreversible transformation of these products (where this is not already happening) will impact on the reuse and recycling rates of Cambridgeshire County Council, (albeit in small quantities due to the tonnages involved) and could have significant economic and social implications for the reuse sector and recycling industry. This could have a negative impact on recycling performance which could affect PFI credit payments if this material is diverted to EfW or HTI.

Answer to Q29:

The limited amount of evidence available on the presence of SCCPs in waste, as presented in Annex A, demonstrates that SCCPs are known to be contained in a range of products and at varying degrees of concentrations within them. It is therefore a challenge to determine what option would be appropriate in the absence of more determining evidence.

Although the consultation document picks up on the practical difficulties in analysing for SCCPs in the waste management system and therefore suggests segregation by material type and use (as in the case of WUDS), the practicalities of taking this approach may be just as challenging given.

- the breadth of products that SCCPs may appear in,
- the ability to segregate them at the point of where they might each appear in the waste stream (as well as the ability to set up and provide separate collection and disposal routes for each material),
- the tonnages involved (versus the costs and ability to segregate each material),
- the difficulties of identifying whether a product has previously been applied with an adhesive, paint or sealant containing SCCPs once the product has become waste.

Cambridgeshire County Council would seek to work with Defra and the Environment Agency to establish what is considered reasonable and feasible when dealing with waste containing SCCPs and would require time and funding to support them in achieving compliance.

30 Are you aware of any evidence to help determine whether SCCPs may fall above or below the waste concentration limit of 1500mg/kg in the UK? Please provide details if so, including with reference to relevant waste streams, tonnages, concentration levels, ability to segregate wastes, and other impacts where possible.

Are you aware of any evidence to help determine whether SCCPs may fall above or below the waste concentration limit of 1500mg/kg in the UK? Please provide details if so, including with reference to relevant waste streams, tonnages, concentration levels, ability to segregate wastes, and other impacts where possible. :

We are not aware of any evidence on levels of SCCPs in waste as the requirement to identify and measure levels of SCCPs to this level of detail in waste streams has not been appreciated by the waste industry.

31 Do you have evidence of the tonnage of waste containing SCCPs in the UK and how they are currently disposed of (landfill, recycling, Energy from Waste)? Please provide details if so.

Do you have evidence of the tonnage of waste containing SCCPs in the UK and how they are currently disposed of (landfill, recycling, Energy from Waste)? Please provide details if so. :

We do not hold this kind of data on the waste materials we handle.

A more detailed understanding of potential tonnages of SCCPs and their current disposal routes in municipal waste could be achieved with more time for Local Authorities to collaborate on waste composition data. Any relevant gaps in evidence would require funding to commission research in these areas.

32 Are you aware of any anticipated costs for disposing of SCCPs contaminated waste (such as incineration gate fees, administrative costs or time taken to familiarise with the requirements and sourcing disposal, testing, segregation, storage of wastes etc)? If so, please provide any supporting evidence.

Are you aware of any anticipated costs for disposing of SCCPs contaminated waste (such as incineration gate fees, administrative costs or time taken to familiarise with the requirements and sourcing disposal, testing, segregation, storage of wastes etc)? If so, please provide any supporting evidence. :

Based on the experience of coming into compliance for dealing with WUDS, the market response to dealing with the material resulted in an average rate per tonne for disposal of this waste doubling in 2023 for most Authorities, even for those who were previously incinerating this waste type. It is anticipated that prices may reduce/ stabilise over time as the risks associated with managing the material are controlled.

It would be prudent to suggest a similar situation would occur to Local Authorities and other relevant parties in response to any new requirements to deal with waste potentially containing SCCPs.

It should also be noted though that any requirements for segregating and disposing of SCCPs would need to be considered alongside current, and any future, requirements for segregating and disposing of other types of waste potentially containing POPs. The impacts identified above inevitably will increase in magnitude exponentially if/ when further requirements are placed on Local Authorities to segregate and dispose of different waste types potentially containing POPs. There will be further costs in identifying, segregating, resource implications as well as space issues at HRC sites.

33 Are you aware of any other organisations that may be impacted by this proposal? Please provide details if so, including references to the number of organisations, types of organisations (Local Authorities, businesses, independent or public bodies), size (micro, small, medium or large), and the anticipated impacts, if known.

Are you aware of any other organisations that may be impacted by this proposal? Please provide details if so, including references to the number of organisations, types of organisations (Local Authorities, businesses, independent or public bodies), size (micro, small, medium or large), and the anticipated impacts, if known. :

Our five District Councils will be affected: South Cambridgeshire, Fenland, East Cambs, Cambridge City & Huntingdonshire as well as Peterborough City Council, (a unitary authority). Across the County bulky waste collections, housing associations, reuse organisations and charities, private waste management companies, repair and reuse businesses who generate this waste as well as producers and retailers of goods containing POPs. As with the case of any changes to waste-related services and legislation, there is a risk that affected waste types could end up in our waste management system, (which includes our bulky waste collections from Peterborough City Council and district council partners. As well as departments within Cambridgeshire County Council who are involved in construction and property maintenance work (who will pay higher rates for disposal of their waste).

34 Are you aware of any evidence to suggest that a lower waste concentration limit would be achievable in the UK with regards to technical and economic feasibility? Please provide details if so, including with reference to current and/or future limits of detection for SCCPs in waste.

Are you aware of any evidence to suggest that a lower waste concentration limit would be achievable in the UK with regards to technical and economic feasibility? Please provide details if so, including with reference to current and/or future limits of detection for SCCPs in waste. :

No further evidence on SCCPs in waste to support a lower concentration limit that is technically and economically feasible.

Waste limits (iv) - Polybrominated diphenyl ethers (PBDE)

35 Is this proposal of particular importance to you and/or the organisation you represent?

Yes (please specify how below)

why important PBDE WL (iv):

Any POPs proposal that relates to material waste types that appear in municipal waste or has the potential to appear in municipal waste as a result of implications to waste from other sectors, i.e., commercial and construction & demolition, is important to Cambridgeshire County Council to understand the requirements of them, and the associated impacts, to come into compliance with the law.

The key waste streams identified in Annex A that are most likely to be affected by the proposed waste limit all appear in waste managed by us.

36 To what extent do you agree or disagree with our proposed waste limit for PBDE (350 mg/kg, dropping to 200 mg/kg 5 years after entry into force)?

Agree

37 Please explain the reasons for your answer to question 36, with reference to evidence and/or possible alternative options where relevant

Please explain the reasons for your answer to question 36, with reference to evidence and/or possible alternative options where relevant:

There is sufficient evidence presented in Annex A to justify the approach suggested in the lead option whilst demonstrating that it will have minimal impact on requirements to manage relevant waste streams.

Cambridgeshire County Council agrees with the idea of taking an approach that goes further than what is anticipated to be proposed for international consideration as it will support a sustainable approach to achieving better outcomes for human health and the environment. The staggered approach suggested in the lead option will provide time for WEEE plastic treatment facilities to take any necessary adjustments to achieve compliance.

38 Based on current EA evidence, decreasing the PBDE waste limit to 200mg/kg in GB is expected to have no/minimal additional impacts on WEEE/ELV plastic recycling, compared to existing waste limits. Are you aware of any evidence to either support or oppose this? Please provide details if so.

Based on current EA evidence, decreasing the PBDE waste limit to 200mg/kg in GB is expected to have no/minimal additional impacts on WEEE/ELV plastic recycling, compared to existing waste limits. Are you aware of any evidence to either support or oppose this? Please provide details if so. :

Not aware of any evidence – Cambridgeshire County Council do not hold this information as they do not undertake chemical testing on products. We lack the funding and resources to do this as well as the time that would require to undertake the testing and obtain results.

39 Are you aware of any evidence to indicate the presence of PBDE in CDW plastics and textiles, and/or other waste streams or sectors? Please provide details if so, including with reference to relevant waste streams, tonnages, concentration levels and impacts where possible.

Are you aware of any evidence to indicate the presence of PBDE in CDW plastics and textiles, and/or other waste streams or sectors? Please provide details if so, including with reference to relevant waste streams, tonnages, concentration levels and impacts where possible.:

Not aware of any evidence.

40 Are there any additional costs you anticipate for disposing of PBDEs contaminated waste under the proposed waste limit (such as incineration gate fees, administrative costs or time taken to familiarise with the requirements and sourcing disposal, testing, segregation, storage of wastes etc)? If so, please can you provide any supporting evidence.

Are there any additional costs you anticipate for disposing of PBDEs contaminated waste under the proposed waste limit (such as incineration gate fees, administrative costs or time taken to familiarise with the requirements and sourcing disposal, testing, segregation, storage of wastes etc)? If so, please can you provide any supporting evidence. :

(Redacted)

Cambridgeshire County Council currently pay per tonne to dispose of this waste. Staff time in terms of training and familiarisation will also be increased if testing of individual items is to take place using XRF technology. Our contractor has quoted a figure of per XRF detector.
(Redacted)

41 Are you aware of any other organisations that may be impacted by this proposal? Please provide details if so, including references to the number of organisations, types of organisations (Local Authorities, businesses, independent or public bodies), size (micro, small, medium or large), and the anticipated impacts, if known.

Are you aware of any other organisations that may be impacted by this proposal? Please provide details if so, including references to the number of organisations, types of organisations (Local Authorities, businesses, independent or public bodies), size (micro, small, medium or large), and the anticipated impacts, if known.:

Our five District Councils will be affected: South Cambridgeshire, Fenland, East Cambs, Cambridge City & Huntingdonshire as well as Peterborough City Council, (a unitary authority).

Waste Limits (v) - Pentachlorophenol (PCP)

42 Is this proposal of particular importance to you and/or the organisation you represent?

Yes (please specify how below)

importance reason PCP WL (v):

Any POPs proposal that relates to material waste types that appear in municipal waste or has the potential to appear in municipal waste as a result of implications to waste from other sectors, i.e., commercial and construction & demolition, is important to Cambridgeshire County Council to understand the requirements of them, and the associated impacts, to ensure compliance with the law.

43 To what extent do you agree or disagree with our proposed waste limit for PCP (100 mg/kg)?

Agree

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

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

The evidence presented in Annex A illustrates that the key material streams that will be affected by the proposal are waste wood, the majority of which is already incinerated and therefore aligns with any compliance requirements set by the limit, and military and industrial textiles, which are in low quantities and the PCP content of this waste is expected to cease by 2028. Currently Cambridgeshire County Council handle 10,000 tonnes per annum, (figures from 2022-23) of wood so this may have a significant cost impact (transport and disposal) if we have to use HTI to dispose of this rather than the current biomass disposal route.

The lead proposal aligns with what is already adopted into the Basel guidelines.

45 Based on current evidence, we anticipate the economic costs of introducing the proposed waste limit for PCP in GB to be none/minimal. Are you aware of any evidence to either support or oppose this view? Please provide details if so, including with reference to gate fees, administrative costs or time taken to familiarise with the requirements and sourcing disposal, testing, segregation, storage of wastes etc.

Based on current evidence, we anticipate the economic costs of introducing the proposed waste limit for PCP in GB to be none/minimal. Are you aware of any evidence to either support or oppose this view? Please provide details if so, including with reference to gate fees, administrative costs or time taken to familiarise with the requirements and sourcing disposal, testing, segregation, storage of wastes etc. :

Not aware of any evidence, Cambridgeshire County Council do not hold this information as they do not undertake chemical testing on products. We lack the funding and resources, to do this as well as the time that would require to undertake the testing and obtain results. Although we could buy this service in from outside current funding constraints mean that this is not a feasible option.

46 Are you aware of any other organisations that may be impacted by this proposal? Please provide details if so, including references to the number of organisations, types of organisations (Local Authorities, businesses, independent or public bodies), size (micro, small, medium or large), and the anticipated impacts, if known.

Are you aware of any other organisations that may be impacted by this proposal? Please provide details if so, including references to the number of organisations, types of organisations (Local Authorities, businesses, independent or public bodies), size (micro, small, medium or large), and the anticipated impacts, if known.:

Our five District Councils will be affected: South Cambridgeshire, Fenland, East Cambs, Cambridge City & Huntingdonshire as well as Peterborough City Council.

Waste limits (vi) – Dioxins, Furans, and dioxin-like PCBs

47 Is this proposal of particular importance to you and/or the organisation you represent?

Yes (please specify how below)

importance reason dioxins WL (vi):

Although Cambridgeshire County Council do not operate EFW we do contract for these services and the cost is likely to rise if the regulations on EFW operators are tightened up. Our current contractor deals with the disposal of POPs waste via this route.

From our research we know that Dioxins and furans are captured as part of the Air Pollution Control Residues (APCR) that are one of the outputs from an Energy Recovery Facility. The costs of managing this output fall on the Local Authority and therefore any requirement to manage this waste stream differently will have an operational and financial impact on Local Authorities.

It should also be noted that there are limited options for managing this waste stream with hazardous landfill and deep long-term storage the two realistic outlets currently. If these changes result in the need to process the material already placed in deep storage, this would represent a significant financial liability which Local Authorities do not have the necessary finances for.

48 To what extent do you agree or disagree with our proposed position to include dioxin-like PCBs in the dioxins and furans waste concentration limit?

Neither agree nor disagree

49 Please explain the reasons for your answer to question 48, with reference to evidence and/or possible alternative options where relevant

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

Cambridgeshire County Council recognises that this may have an impact on our waste disposal contract due to the potential increase in costs associated with having to deal with this waste in a compliant manner.

50 To what extent do you agree or disagree with our proposed waste concentration limit for dioxins, furans, and dioxin-like PCBs (0.005 mg TEQ/kg, including dioxin-like PCBs)?

Agree

51 Please explain the reasons for your answer to question 50, with reference to evidence and/or possible alternative options where relevant

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

Cambridgeshire County Council supports reduced limits for dioxins, furans, and dioxin like PCBs to prevent these items from getting into the environment however we do not have any specific evidence to provide.

52 Based on current evidence, we anticipate the economic impacts of decreasing the dioxins and furans waste limit to 0.005 TEQ/kg in GB to have limited impacts on biomass incinerator APCR and no impacts on domestic ash. Are you aware of any evidence to either support or oppose this view? Please provide details if so, including with reference to relevant waste streams, tonnages, concentration levels and impacts where possible.

Based on current evidence, we anticipate the economic impacts of decreasing the dioxins and furans waste limit to 0.005 TEQ/kg in GB to have limited impacts on biomass incinerator APCR and no impacts on domestic ash. Are you aware of any evidence to either support or oppose this view? Please provide details if so, including with reference to relevant waste streams, tonnages, concentration levels and impacts where possible. :

Not aware of any evidence from a local perspective.

53 The EU Impact Assessment identifies approximately 20 waste streams where dioxins and furans can be found, primarily in waste streams related to combustion activities. Are you aware of any other waste streams that are likely to be impacted by a lower waste concentration limit value? Please provide details if so.

The EU Impact Assessment identifies approximately 20 waste streams where dioxins and furans can be found, primarily in waste streams related to combustion activities. Are you aware of any other waste streams that are likely to be impacted by a lower waste concentration limit value? Please provide details if so. :

We are not aware of any other waste streams that would be impacted.

54 Are there any additional costs you anticipate for disposing of PCDD/F waste under the proposed waste limit (such as gate fees, administrative costs or time taken to familiarise with the requirements and sourcing disposal, testing, segregation, storage of wastes etc)? Please provide details if so.

Are there any additional costs you anticipate for disposing of PCDD/F waste under the proposed waste limit (such as gate fees, administrative costs or time taken to familiarise with the requirements and sourcing disposal, testing, segregation, storage of wastes etc)? Please provide details if so. :

There are a number of potential additional costs but without further information, it is not possible to provide details on these. The areas where costs could arise include but are not limited to:

- Communications with the public and businesses who use the services of Cambridgeshire County Council plus those of our partner Waste Collection Authorities.
- Resource time to review and understand the requirements.
- Waste composition analysis to identify the materials that are contained with mixed municipal solid waste streams.
- Internal and external resource implications in terms of officer time and that we may have to put a case together to bid for more financial resources to

allow us to undertake this additional work.

- Additional costs e.g. in relation to waste collection and disposal thus we would encourage DEFRA to provide new burden funding to deal with this.
 - Supply issues and capacity in our existing or potential supply chain to deal with the waste disposal issues.
 - Chemical composition testing – if required although this would be a significant change for local authorities as it is not something that is done currently and would require use of laboratories to undertake.
 - Contract review / renegotiation / re-procurement work – depending on the level of change and the contract this cost could vary.
 - Any assessments that are needed to determine the optimal option and internal decision making would carry a cost in terms of officer time.
 - Changes to infrastructure may be required to enable material streams to be segregated from other wastes.
 - Changes in gate fees and haulage costs depending on what processing solution is required and what the location of suitable facilities may be.
- Our experience of managing Waste Upholstered Domestic Seating (WUDS) shows that there would be increased costs but that these vary from authority to authority depending on many factors.

55 There is limited analytical information available on the concentration of dioxin- like PCBs in waste and the amount of waste that would be diverted to different treatments under the lead waste limit option. Are you aware of any evidence regarding relevant waste streams, tonnages, concentration levels, ability to segregate waste, and associated costs (such as gate fees, administrative costs or time taken to familiarise with the requirements and sourcing disposal, testing, segregation, storage of wastes etc)? Please provide details if so.

There is limited analytical information available on the concentration of dioxin- like PCBs in waste and the amount of waste that would be diverted to different treatments under the lead waste limit option. Are you aware of any evidence regarding relevant waste streams, tonnages, concentration levels, ability to segregate waste, and associated costs (such as gate fees, administrative costs or time taken to familiarise with the requirements and sourcing disposal, testing, segregation, storage of wastes etc)? Please provide details if so. :

Cambridgeshire County Council does not hold any information or evidence in relation to this.

We lack the funding and resources to do this as well as the time that would require to undertake the testing and obtain meaningful results.

56 Are you aware of any other organisations that may be impacted by this proposal? Please provide details if so, including references to the number of organisations, types of organisations (Local Authorities, businesses, independent or public bodies), size (micro, small, medium or large), and the anticipated impacts, if known.

Are you aware of any other organisations that may be impacted by this proposal? Please provide details if so, including references to the number of organisations, types of organisations (Local Authorities, businesses, independent or public bodies), size (micro, small, medium or large), and the anticipated impacts, if known.:

The current waste PFI contract that Cambridgeshire County Council has, (although it does not include incineration) means that it needs amending each and every time the legislation or EA guidance changes which is both costly and time consuming. Cambridgeshire County Council would suggest that communications with local authorities is initially done via existing Local Authority networks – NAWDO, LARAC, ADEPT, DCN, LEDNET, ESA, EA, CIWM and the LGA to maximise the potential of reaching all of them.

Waste limits (vii) - DicofoI

57 Is this proposal of particular importance to you and/or the organisation you represent?

I don't know

importance reason dicofoI WL vii:

58 To what extent do you agree or disagree with our proposed waste limit for dicofoI (50mg/kg)?

Agree

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

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

Cambridgeshire County Council agree that it would be appropriate to adopt the waste limit for DicofoI that has already been agreed by the Basel and Stockholm conventions.

60 Based on current evidence, we anticipate the economic costs of lowering the dicofoI waste limit in GB to be zero or minimal. Are you aware of any evidence to either support or oppose this view, including with reference to costs such as gate fees, administrative costs or time taken to familiarise with the requirements and sourcing disposal, testing, segregation, storage of wastes etc)? Please provide details if so.

Based on current evidence, we anticipate the economic costs of lowering the dicofoI waste limit in GB to be zero or minimal. Are you aware of any evidence to either support or oppose this view, including with reference to costs such as gate fees, administrative costs or time taken to familiarise with the requirements and sourcing disposal, testing, segregation, storage of wastes etc)? Please provide details if so. :

Not aware of any evidence to either support or oppose this view.

61 Are you aware of any other organisations that may be impacted by this proposal? Please provide details if so, including references to the number of organisations, types of organisations (Local Authorities, businesses, independent or public bodies), size (micro, small, medium or large), and the anticipated impacts, if known.

Are you aware of any other organisations that may be impacted by this proposal? Please provide details if so, including references to the number of organisations, types of organisations (Local Authorities, businesses, independent or public bodies), size (micro, small, medium or large), and the anticipated impacts, if known.:

Cambridgeshire County Council property division could be affected by this proposal.

Waste limits (viii) – Hexabromocyclododecane (HBCDD)

62 Is this proposal of particular importance to you and/or the organisation you represent?

Yes (please specify how below)

importance reason HCB WL (viii):

Any POPs proposal that relates to material waste types that appear in municipal waste or has the potential to appear in municipal waste as a result of implications to waste from other sectors, i.e., commercial and construction & demolition, is important to Cambridgeshire County Council so that we can understand the requirements of them, and the associated impacts, to come into compliance with the law.

This proposal is of particular importance to us because details in Annex A suggest the legislation is already in place for various forms of polystyrene insulation panels to be treated as POPs waste, and as stated in Annex A, it is likely that this requirement is not widely understood by Local Authorities, as well as the wider waste industry. An understanding of the implications to managing waste potentially containing HBCDD because of a change to the waste concentration limit should be incorporated (once known) to discussions relating to raising awareness of potentially non-compliant activities around the disposal of polystyrene-based insulation panels, which need to take place with immediate effect to ensure compliance is achieved.

63 To what extent do you agree or disagree with our proposed waste limit for HBCDD (500 mg/kg)?

Neither agree nor disagree

64 Please explain the reasons for your answer to question 63, with reference to evidence and/or possible alternative options where relevant

Please explain the reasons for your answer to question 63, with reference to evidence and/or possible alternative options where relevant:

The lead option is proposed at 500mg/kg but options 2 and 3 are proposed much lower at 200mg/kg and 100mg/kg respectively. Our understanding of the evidence presented is.

- EPS/XPS insulation panels are already in scope as POPs waste because they contain HBCDD at concentrations greater than 1,000mg/kg.
- EPS/XPS panels have an average HBCDD concentration of 9,400mg/kg so if contained within mixed CDW when a waste limit of 500mg/kg is applied, EPS/XPS panels would need to account for 5% of the total weight to exceed this limit, which we agree would be a challenge based on polystyrene's weight to volume ratio.
- The EU Impact Assessment considers the HBCDD concentration levels in WEEE and textiles to be low.
- HBCDD was the second highest POP identified in WUDS at limits exceeding existing waste concentration limits, and action is already being taken on this waste stream.

Based on our understanding, we believe there may be scope to decrease the waste concentration limit to align more with options 2 and 3.

There is a lack of evidence presented on identified concentrations of HBCDD in waste when it is applied as an adhesive or coating that is bonded to another item. It is therefore not known if this would present a risk to Cambridgeshire County Council, (our Districts and City Council partners) when managing waste if the limit was reduced to options 2 or 3.

65 Based on current evidence, we anticipate the economic costs of lowering the HBCDD waste limit in GB to be minimal for all waste streams. Are you aware of any evidence to either support or oppose this view, including with reference to costs such as incineration gate fees, administrative costs or time taken to familiarise with the requirements and sourcing disposal, testing, segregation, storage of wastes etc? Please provide details if so.

Based on current evidence, we anticipate the economic costs of lowering the HBCDD waste limit in GB to be minimal for all waste streams. Are you aware of any evidence to either support or oppose this view, including with reference to costs such as incineration gate fees, administrative costs or time taken to familiarise with the requirements and sourcing disposal, testing, segregation, storage of wastes etc? Please provide details if so.:

We have already taken action to ensure WUDS are segregated (subject to use of RPS 266) and destroyed or irreversibly transformed, and it is evident from the consultation that there are existing additional requirements to segregate and destroy/ irreversibly transform any EPS/XPS insulation panels that may appear in municipal waste. The evidence indicates that lowering the HBCDD waste concentration limit might impact on mixed CDW and items applied with adhesives and coatings that have bonded with them, bringing them into scope as POPs waste.

The economic impacts in managing existing and any newly classified POPs waste will be subject to what is determined as reasonable and feasible for them to segregate and destroy/ irreversibly transform each of these affected materials.

Waste management infrastructure, such as Household Waste Recycling Centres (HWRCs) and Transfer Stations (WTSs), have finite capacity and space, and most are already exhausted in terms of use of space, number of containers and separate collection of different waste types that can be accommodated.

Any additional requirements to segregate waste types, (for shredding and incineration), compared with providing one container labelled as 'POPs Waste' which could capture all affected materials will put further pressure on capacity limits to the point where new requirements cannot be accommodated and there is reduced capacity for managing existing separated waste types. Consequently other waste types are displaced to accommodate new requirements or significant investment is required to extend/ build new infrastructure.

Additional requirements for more POPs waste to be destroyed may also create issues regarding capacity at incinerators so consideration should be given to investment in new facilities or potentially face increased costs for displaced material.

There needs to be recognition of the additional financial burden this may place on local authorities and sufficient funding support provided by government for the direct impacts changing limits will have on how Cambridgeshire County Council handles and treats waste containing these chemicals.

In addition to dealing with new waste loads, consideration may need to be given to the economic impacts of having to deal with any legacy issues with waste polystyrene packaging dating pre-2015 when the use of HCBDD was restricted.

66 Are you aware of any other organisations that may be impacted by this proposal? Please provide details if so, including references to the number of organisations, types of organisations (Local Authorities, businesses, independent or public bodies), size (micro, small, medium or large), and the anticipated impacts, if known.

Are you aware of any other organisations that may be impacted by this proposal? Please provide details if so, including references to the number of organisations, types of organisations (Local Authorities, businesses, independent or public bodies), size (micro, small, medium or large), and the anticipated impacts, if known.:

As a Waste Disposal Authority we could experience higher costs in terms of setting up systems to separately collect and dispose of POPs waste. Five District Councils will be affected: South Cambridgeshire, Fenland, East Cambs, Cambridge City & Huntingdonshire along with Peterborough City Council, (a unitary authority). Across the County housing associations, reuse organisations and charities, private waste management companies, repair and reuse businesses who generate this waste as well as producers and retailers of goods containing POPs. As with the case of any changes to waste-related services and legislation, there is a risk that affected waste types could end up in Cambridgeshire County Council waste management systems.

Building owners (in relation to replacement of cladding) and the Construction and building industry could also be impacted by this proposal.

Waste limits (ix) – UV328, Dechlorane Plus, and Methoxychlor

67 Is this proposal of particular importance to you and/or the organisation you represent?

Yes (please specify how below)

importance reason WL (ix):

Any POPs proposal that relates to material waste types that appear in municipal waste or has the potential to appear in municipal waste as a result of implications to waste from other sectors, i.e., commercial and construction & demolition, is important that we understand the requirements of them, and the associated impacts, to come into compliance with the law.

68 Are you aware of any evidence to suggest a waste concentration limit value for UV-328 that would be suitable for adoption within GB if and/or when this substance is adopted as a POP by the Stockholm Convention? Please provide details if so, including with reference to data sources, timescales, tonnages impacted and potential 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 a waste concentration limit value for UV-328 that would be suitable for adoption within GB if and/or when this substance is adopted as a POP by the Stockholm Convention? Please provide details if so, including with reference to data sources, timescales, tonnages impacted and potential 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. :

Not aware of any evidence – we do not hold this information and do not undertake chemical testing on products. We lack the funding and skills to do this as well as the time that would require to undertake the testing and obtain results.

69 Are you aware of any evidence to suggest a waste concentration limit value for Methoxychlor that would be suitable for adoption within GB if and/or when this substance is adopted as a POP by the Stockholm Convention? Please provide details if so, including with reference to data sources, timescales, tonnages impacted and potential 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 a waste concentration limit value for Methoxychlor that would be suitable for adoption within GB if and/or when this substance is adopted as a POP by the Stockholm Convention? Please provide details if so, including with reference to data sources, timescales, tonnages impacted and potential 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. :

Not aware of any evidence, we do not hold this information as we do not undertake chemical testing on products. We lack the funding and skills to do this as well as the time that would require to undertake the testing and obtain results.

70 Are you aware of any evidence to suggest a waste concentration limit value for Dechlorane Plus that would be suitable for adoption within GB (if and/or when this substance is adopted as a POP by the Stockholm Convention)? Please provide details if so, including with reference to data sources, timescales, tonnages impacted and potential 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 a waste concentration limit value for Dechlorane Plus that would be suitable for adoption within GB (if and/or when this substance is adopted as a POP by the Stockholm Convention)? Please provide details if so, including with reference to data sources, timescales, tonnages impacted and potential 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. :

Not aware of any evidence, we do not hold this information as we do not undertake chemical testing on products. We lack the funding and skills to do this as well as the time that would require to undertake the testing and obtain results.

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 further evidence to suggest amendments to other waste concentration limits.

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?

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:

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

Not Answered

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:

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. :

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. :

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 will we be able to differentiate between these different chemical compounds?
- Will any new burden funding be made available to allow the purchase of detection equipment & training for staff at HRC sites and transfer stations.
- What about the legal costs for changes in law to disposal contracts?
- Communication, what strategy are DEFRA proposing to inform all interested parties?

Consultee Feedback on the Online Survey

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

Satisfied

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. :

You could provide a box under q27 for answers as I've had to use the box under q 28