



[Home](#) > [Environment](#) > [Chemicals](#)

> [Draft evaluations of 3 chemical substances proposed as Persistent Organic Pollutants \(POPs\): call for comments](#)

[Department
for Environment
Food & Rural
Affairs](#)

Consultation outcome

Summary of responses and government response

Updated 15 August 2023

Contents

1. [Executive summary](#)
2. [Number of responses](#)
3. [Summary of responses](#)
4. [Government response](#)



© Crown copyright 2023

This publication is licensed under the terms of the Open Government Licence v3.0 except where otherwise stated. To view this licence, visit nationalarchives.gov.uk/doc/open-government-licence/version/3 or write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or email: info@nationalarchives.gov.uk.

Where we have identified any third party copyright information you will need to obtain permission from the copyright holders concerned.

This publication is available at <https://www.gov.uk/government/consultations/draft-evaluations-of-3-chemical-substances-proposed-as-persistent-organic-pollutants-pops-call-for-comments/outcome/summary-of-responses-and-government-response>

1. Executive summary

Defra held a call for comments on draft documents for 3 substances being proposed for listing as Persistent Organic Pollutants (POPs) on the UN Stockholm Convention. POPs proposals are sent to and reviewed by the Convention's POPs Review Committee (POPRC).

Following a [previous Defra call for information \(https://www.gov.uk/government/publications/request-for-information-on-substances-proposed-as-persistent-organic-pollutants-pops-2022\)](https://www.gov.uk/government/publications/request-for-information-on-substances-proposed-as-persistent-organic-pollutants-pops-2022) to aid the drafting of documents to be evaluated by the POPRC, this call for comments invited the public to provide comments on the following draft documents:

- draft risk profile for chlorpyrifos
- draft Risk Management Evaluation (RME) for chlorinated paraffins with carbon chain lengths in the range C14 to17 and with chlorination levels at or exceeding 45 percent chlorine by weight, known as medium-chain chlorinated paraffins (MCCPs)
- draft RME for long-chain perfluorocarboxylic acids, their salts and related compounds (LC-PFCAs)

Responses to this call for comments were used to inform the UK's submission to the secretariat of the Stockholm Convention on the POPRC documents as part of the process of information gathering and rounds of commenting on draft documents between meetings of the POPRC. Later drafts of these documents will be considered at the next POPRC meeting in October 2023.

2. Number of responses

We received 1 response from AGC Chemicals Europe Ltd, a chemicals company producing fluoro-products in the UK.

The 1 response received commented on the draft RME for LC-PFCAs.

No responses were received with reference to the draft RME for MCCPs or the revised draft Risk Profile for chlorpyrifos.

3. Summary of responses

AGC Chemicals Europe Ltd provided comments on the Risk Management Evaluation for LC-PFCAs. They commented that many of the listed uses of LC-

PFCAs are applications for Polytetrafluoroethylene (PTFE) micro-powders rather than specific applications for PFCAs and that PFCAs can be present as non-intentionally added substances (NIAS) in PTFE micro-powders at trace levels (under 1 ppm) and with no technical function. As a fluoropolymer manufacturer, they were unable to comment on the accuracy of all the application data for LC-PFCAs and added that engagement with users would be required to confirm whether LC-PFCAs are directly used in the various applications listed.

In relation to control measures for unintentional releases of LC-PFCAs, AGC commented that it is only during the production of PTFE micro-powders by degradation where LC-PFCAs may be formed as NIAS, that they are not expected to be formed during the manufacture of other types of PTFE powders such as granular or fine powder (coagulated dispersion) grades. AGC also added that their understanding is that LC-PFCAs are effectively encapsulated in PTFE and are therefore unlikely to leach.

AGC commented that, if LC-PFCAs were listed in Annex A of the Stockholm Convention, they would require an exemption equivalent to that in the EU POPs regs (EU 2023/866) for the transport of PTFE micro-powders after the degradation step for the purpose of the reduction of C9-C21 PFCAs before placing on the market for the downstream users. They also recommended that all PTFE micro-powder applications should be exempted if C9-C21 PFCAs are present as NIAS below agreed thresholds.

Where the RME referred to thermal decomposition of fluoropolymers, AGC commented that if disposal is carried out by incineration, they recommend a minimum temperature of 800°C, and if it is considered as hazardous waste, then a temperature of 1,100°C is required.

4. Government response

Comments received in this call were incorporated into the UK's submission of comments to the Stockholm Convention's POPRC as part of several commenting and redrafting cycles for these evaluation documents.

The POPRC also held their own call for comments on these draft documents. Revised drafts of these evaluation documents will be considered at the next POPRC meeting in October 2023.

The Stockholm Convention website includes more information [about POPRC's calls for comments](http://www.pops.int/TheConvention/POPsReviewCommittee/Meetings/POPRC18/Overview/tabid/9165/Default.aspx) (<http://www.pops.int/TheConvention/POPsReviewCommittee/Meetings/POPRC18/Overview/tabid/9165/Default.aspx>).

[↑ Back to top](#)



OGI

All content is available under the Open Government Licence v3.0, except where otherwise stated

© Crown copyright