

Response ID ANON-75K5-1Z6W-4

Submitted to Consultation on potential amendments to the Persistent Organic Pollutants (POPs) Regulation
Submitted on 2023-04-27 14:17:45

Introduction

About you

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

Yes (please give a reason for your answer below)

Reason for confidentiality:

Our response includes cost values for testing and disposal from our third party suppliers.

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?

Large business (250 or more employees, including global operations)

Other:

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

organisation name:
EDF Energy

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

England, Wales, Scotland, Northern Ireland, Outside the UK (EU), Outside the UK (non-EU)

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)):

This has potential to present a significant increase in the costs associated with testing and disposal of articles that contain this component and time resource in identifying impacted waste streams.

The impact that cannot be quantified arises due to the widespread use of POPs in the manufacturing of articles for the supply chain. There is potential that there are many articles containing these in use within EDF.

Time and costs will be incurred in:

(a) Developing new standards for the business and familiarisation of relevant personnel with changes.

(b) Developing testing strategies and undertaking testing. Many articles do not have safety data sheets, therefore a strategy will be required to identify products and articles EDF has on its sites that may contain PFOA above these levels.

(c) Additional waste segregation.

(d) Waste preparation, transport and disposal costs. For example, high temperature incineration costs for contaminated storage equipment associated with AFFF in 2023 have been over £4300 a tonne.

Please also refer to EDF response to question 110, which highlights potential impacts relating to management of radioactive waste and supply chain risks.

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))?

I don't know

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):

Other than in C8 AFFF EDF are not currently aware of substances and articles that may have levels of PFOA within them above this specific level across our sites, therefore cannot comment. See question 8 response.

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.:

This is currently an unknown. See question 8 response.

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. :

EDF expect there to be similar impacts as those experienced with the replacement of C8 AFFFs. There will be additional time and costs due to the 'unknown' articles that may contain PFOA in use across EDF sites – see question 8.

Anticipated 'one off' time and costs:

(a) Internal time and costs in developing new standards for the business (estimate 2 days) and familiarisation of relevant personnel with changes (estimate 1 day per site; as a multi-site company this could be considerable).

(b) Developing testing strategies. Many articles do not have safety data sheets, therefore a strategy will be required to identify products and articles EDF has on its sites that may contain PFOA above these levels. Testing strategies would be required to determine appropriate disposal routes. This activity involves: (i) assessment and decisions on wastes to sample, (ii) development and agreement of sample test plans.

Due to the wide range of articles/products that could contain POPs, it will not be practicable for EDF to test all possible waste streams for the presence of PFOA and wider POPs. UK Industry needs clear guidance on types of waste that are likely to contain POPs and if testing should be undertaken based on collected evidence that the threshold may or may not be exceeded. This will enable efficient decision making on waste disposal routes. Without this guidance, UK industry will face a cost burden in identifying appropriate disposal routes.

There may also be an unnecessary demand on disposal routes, such as high temperature incinerators, should generators of waste conclude that it is more cost-effective to make overly conservative judgements on POPs content and disposal routes rather than determine actual concentrations. This increase in demand may have associated cost increases.

(c) Testing in accordance with strategy including sample collection and preparation, and laboratory testing and interpretation. EDF have been quoted up to £1,000 per sample for the third-party laboratory testing, which included a hazardous waste assessment including a POPs suite with interpretation.

(d) Establishing additional waste segregation facilities.

Ongoing costs, rather than one offs will then include routine testing (costs as above), waste segregation, waste preparation, transport and disposal costs (Question 8 response includes disposal costs).

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. :

Please see EDF's response to question 110.

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. :

EDF are not currently aware of the implications and concentrations in hydraulic fluids.

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 :

Please see EDF's response to questions 8 and 12.

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. :

The introduction of waste concentration limits specific to one waste type would provide UK industry with more certainty regarding which waste streams and articles require testing to determine disposal routes. The widespread use of POPs in manufacturing in the supply chain means that levels of POPs in articles in current use is unknown. UK industry will require guidance to enable implementation of this legislation to enable waste testing and disposal decisions to be made.

Please also refer to EDF's response to question 12.

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? :

PFHxS is used in the current C6 Hexane fire-fighting foams across EDF sites. This is an important product for fire safety, including nuclear safety.

If these proposals have a 'knock on' impact and result in supplier reformulation of substances and availability of this fire fighting foam, additional resource and costs will be incurred. This arises from the need to identify and qualify alternatives that are suitable for use in EDF's application and to ensure that nuclear safety is maintained.

This POP may also be present in waste articles – see EDF response to question 8; these comments are also applicable to PFHxS.

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)?

I don't know

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 :

EDF currently have insufficient product data on the C6 Hexane fire-fighting foam to form a view on the proposed waste limit.

Other than in fire fighting foams EDF are not aware of substances and articles that may have levels of PFHxS within them above this level within our sites, therefore cannot comment. See question 8 response.

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. :

EDF currently do not hold any information with regards to this question.

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 :

EDF currently do not hold any information with regards to this question.

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. :

See EDF response to question 12, these comments also apply here.

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. :

Please see EDF's response to question 110.

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 :

Please see EDF's response to questions 8 and 12. EDF do not have any test costs specific for PFHxS, therefore would extrapolate the PFOA information.

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. :

Please see EDF's response to questions 8 and 12. EDF do not have any test costs specific for PFHxS, therefore would extrapolate the PFOA information.

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. :

Please refer to EDF's response to question 16.

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)?

I don't know

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:

Explanation to EDF's answer to Question 27:

EDF have identified that there are lubricants currently used across its sites that contain SCCPs. EDF will have to consider how to practically manage and dispose of these when they reach end of life and how this will be different to management of other waste lubricants.

Plant which has been in contact with the lubricants will also require assessment to consider whether these exceed the waste limits for the POP. This POP may also be present in waste articles – see EDF response to question 8; these comments are also applicable to SCCPs.

Explanation to EDF's answer to Question 28:

EDF currently have insufficient product data on lubricants containing SCCPs to form a view on the proposed waste limit for SCCPs.

Other than the identified lubricants EDF are not aware of substances and articles that may have levels of SCCPs within them above this level within our sites, therefore cannot comment. See question 8 response.

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. :

EDF do not currently hold any information with regards to this question.

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. :

EDF do not currently hold any information with regards to this question.

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. :

EDF do not have any specific information regarding SCCPs and would use information relating to C8 AFFFs.

Please see the EDF response to Q8 and 12.

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. :

Please see EDF's response to question 110.

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. :

EDF do not currently hold any information with regards to this question.

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

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

I don't know

why important PBDE WL (iv):

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)?

I don't know

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:

Due to wide ranging use of POPs in manufacturing and the supply chain, this POP may be present in articles, but are not identified in the current stock catalogue.

This POP may therefore be present in waste articles – see EDF response to question 8, these comments are also applicable to this POP.

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. :

EDF note that this evidence is only presented for WEEE/ELV plastic recycling. The EDF business generates other plastics waste streams that also need to be considered.

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.:

EDF do not currently hold any information with regards to this question.

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. :

EDF do not have any specific information regarding PBDEs and would use information relating to C8 AFFFs.
Please see the EDF response to Q8 and 12.

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.:

Please see EDF's response to question 110.

Waste Limits (v) - Pentachlorophenol (PCP)

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

I don't know

importance reason PCP WL (v):

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

I don't know

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 :

Due to wide ranging use of POPs in manufacturing and the supply chain, this POP may be present in articles, but are not identified in the current stock catalogue.

This POP may therefore be present in waste articles – see EDF response to question 8, these comments are also applicable to this POP.

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. :

EDF do not currently hold any information with regards to this question.

Comments in EDFs response to question 12 relating to articles that may contain POPs and requirements for guidance on when to test and impacted waste streams apply here.

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.:

See response to question 110.

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

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

I don't know

importance reason dioxins WL (vi):

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 :

EDF consider this would not present a significant change based on initial assessments.

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)?

Neither agree nor disagree

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 :

No comment,

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. :

No comment.

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. :

The EU impact assessment report also mentions a potential impact on waste oil recycling. Has this been considered for the UK?

EDF would be concerned if any decision made impacts on the waste oil recycling market.

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. :

EDF do not currently hold any information with regards to this question.

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. :

EDF do not currently hold any information with regards to this question.

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.:

See response to question 110.

Waste limits (vii) - Dicofof

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

I don't know

importance reason dicofof WL vii:

No comment

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

Neither agree nor disagree

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 :

No comment

60 Based on current evidence, we anticipate the economic costs of lowering the dicofof 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 dicofol 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. :

No comment

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.:

No comment

Waste limits (viii) – Hexabromocyclododecane (HBCDD)

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

I don't know

importance reason HCB WL (viii):

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

I don't know

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:

Due to wide ranging use of POPs in manufacturing and the supply chain, this POP may be present in articles, but are not identified in the current stock catalogue.

This POP may therefore be present in waste articles – see EDF response to question 8, these comments are also applicable to this POP.

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.:

EDF do not currently hold any information with regards to this question.

Comments in EDFs response to question 12 relating to articles that may contain POPs and requirements for guidance on when to test and impacted waste streams apply here.

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.:

See response to Question 110

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

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

I don't know

importance reason WL (ix):

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. :

EDF have concerns around the practical implications for identifying waste plastic that may contain UV- 328.

Guidance is required to support UK industry with the correct disposal of waste, which may contain UV- 328.

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. :

Comments in EDFs response to question 12 relating to articles that may contain POPs and requirements for guidance on when to test and impacted waste streams apply here.

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. :

No comment.

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 comment.

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?

(iii) PFOA exemption 5e;

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:

The amendments proposed may result in the reformulation and replacement of articles or products in our supply chain. Such changes would require identification of available alternatives, compatibility testing and product qualification, where they are used for nuclear safety significant applications. This may impact our operations.

EDF cannot quantify the specific impacts and costs that this may have, due to the widespread use of POPS in manufacturing of articles that do not have detailed safety data sheets.

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

I don't know

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:

EDF currently does not have the information available to provide a position to the proposals. EDF supports a precautionary approach to the necessary environmental protection against POPs, however nuclear safety must be maintained throughout our operations.

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

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

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

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

Yes

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

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

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

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. :

EDF are using articles that currently contain PFOA. Some products are still required until suitable alternatives become available. A review is being undertaken to understand where POPs containing articles have been and are being used within our sites and where these have nuclear significant safety functions.

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. :

Unknown – a programme of work is underway to better understand its use.

UTC exempted levels (i) – proposed removal of exemption for PFOA for use in transported isolated intermediate

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

No

80 If you answered yes to question 79, how would it impact you or your organisation? Please provide details, including any supporting evidence or information on potential financial costs.

If yes, how would it impact you or your organisation? Please provide details, including any supporting evidence or information on potential financial costs. :

No comment.

81 To what extent do you agree or disagree with our proposal to remove this exemption?

Neither agree nor disagree

82 Please explain the reasons for your answer to question 81, 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 :

No comment.

83 Are you aware of how many organisations may be impacted by this proposal? Please provide details if so, including any references to organisation size (micro, small, medium or large).

Are you aware of how many organisations may be impacted by this proposal? Please provide details if so, including any references to organisation size (micro, small, medium or large). :

No comment.

UTC exempted levels (ii) – proposed amendments to exemption for PFOA in PTFE micropowders

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

No

85 If you answered yes to question 84, how would it impact you or your organisation? Please provide details, including any supporting evidence or information on potential financial costs.

If yes, how would it impact you or your organisation? Please provide details, including any supporting evidence or information on potential financial costs. (UTC ii) :

N/A

86 To what extent do you agree or disagree with our proposals as stated above? Please explain the reasons for your answer, with reference to evidence and/or possible alternative options where relevant

Neither agree nor disagree

To what extent do you agree or disagree with our proposals as stated above? Please explain the reasons for your answer, with reference to evidence and/or possible alternative options where relevant UTC ii:

No comment

UTC exempted levels (iii) – call for evidence regarding HCB

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

No

88 If you answered yes to question 87, how would it impact you or your organisation? Please provide details, including any supporting evidence or information on potential financial costs?

If you answered yes to question 87, how would it impact you or your organisation? Please provide details, including any supporting evidence or information on potential financial costs? :

No comment

89 Are you aware of any evidence to suggest that a UTC exemption for HCB is needed within the UK? If yes, please provide details on your answer including any supporting evidence or information on potential financial costs.

Are you aware of any evidence to suggest that a UTC exemption for HCB is needed within the UK? If yes, please provide details on your answer including any supporting evidence or information on potential financial costs. :

No comment

90 Are you aware of any evidence to suggest that a UTC exemption to allow 10 mg/kg (0.001 % by weight) would be suitable for adoption within GB? Please provide details if so.

Are you aware of any evidence to suggest that a UTC exemption to allow 10 mg/kg (0.001 % by weight) would be suitable for adoption within GB? Please provide details if so. :

No comment

91 Are you aware of any evidence to suggest that a UTC exemption of another value would be suitable for adoption within GB? Please provide details if so.

Are you aware of any evidence to suggest that a UTC exemption of another value would be suitable for adoption within GB? Please provide details if so. :

No comment

UTC exempted levels (iv) – call for evidence regarding PCP

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

No

93 If you answered yes to question 92, how would it impact you or your organisation? Please provide details, including any supporting evidence or information on potential financial costs.

If you answered yes to question 92, how would it impact you or your organisation? Please provide details, including any supporting evidence or information on potential financial costs.:

No comment

94 Are you aware of any evidence to suggest that a UTC exemption for PCP is needed within the UK? Please provide further details if so, including any supporting evidence or information on potential financial costs.

Are you aware of any evidence to suggest that a UTC exemption for PCP is needed within the UK? Please provide further details if so, including any supporting evidence or information on potential financial costs.:

No comment

95 Are you aware of any evidence to suggest that a UTC exemption to allow 5 mg/kg (0.0005 % by weight) would be suitable for adoption within GB? Please provide details if so.

Are you aware of any evidence to suggest that a UTC exemption to allow 5 mg/kg (0.0005 % by weight) would be suitable for adoption within GB? Please provide details if so. :

No comment

96 Are you aware of any evidence to suggest that a UTC exemption of another value would be suitable for adoption within GB? Please provide details if so.

Are you aware of any evidence to suggest that a UTC exemption of another value would be suitable for adoption within GB? Please provide details if so. :

No comment

UTC exempted levels (v) – Call for evidence regarding other POPs

97 For any of the other POPs that currently do not have UTC exemptions listed in the POPs Regulation, are you aware of any evidence to suggest that a UTC exemption needs to be introduced? Please provide details if so, including any references to potential impacts and/or financial costs where relevant.

For any of the other POPs that currently do not have UTC exemptions listed in the POPs Regulation, are you aware of any evidence to suggest that a UTC exemption needs to be introduced? Please provide details if so, including any references to potential impacts and/or financial costs where relevant. :

No comment

98 For any of the other POPs that already have UTC exemptions listed in the POPs Regulation, are you aware of any evidence to suggest that these need to be amended? Please provide details if so.

For any of the other POPs that already have UTC exemptions listed in the POPs Regulation, are you aware of any evidence to suggest that these need to be amended? Please provide details if so. :

No comment

99 For any of the substances that could soon be adopted as POPs (UV-328, DP, Methoxychlor), are you aware of any evidence to suggest that a UTC exemption would need to be introduced alongside introduction of these substance/s to the POPs Regulation? Please provide details if so.

For any of the substances that could soon be adopted as POPs (UV-328, DP, Methoxychlor), are you aware of any evidence to suggest that a UTC exemption would need to be introduced alongside introduction of these substance/s to the POPs Regulation? Please provide details if so. :

No comment

SECTION FOUR: Potential addition of Toxic Equivalency Factor (TEF) values for a POP

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

I don't know

101 If you answered yes to question 100, how would it impact you or your organisation? Please provide details, including any supporting evidence or information on potential financial costs, where relevant.

If you answered yes to question 100, how would it impact you or your organisation? Please provide details, including any supporting evidence or information on potential financial costs, where relevant.:

No comment

102 Are you aware of any evidence to suggest that a TEF value for DL-PCBs would be needed within GB? Please provide details if so.

Are you aware of any evidence to suggest that a TEF value for DL-PCBs would be needed within GB? Please provide details if so.:

No comment

103 Are you aware of any evidence to suggest that a TEF value for DL-PCBs as set out in the above table would be suitable for adoption within GB? Please provide details if so.

Are you aware of any evidence to suggest that a TEF value for DL-PCBs as set out in the above table would be suitable for adoption within GB? Please provide details if so.:

No comment

104 Are you aware of any evidence to suggest that a different TEF value for DL-PCBs would be suitable for adoption within GB? Please provide details if so.

Are you aware of any evidence to suggest that a different TEF value for DL-PCBs would be suitable for adoption within GB? Please provide details if so.:

No comment

105 Are you aware of any evidence to suggest that any other TEF values as listed in the POPs Regulation need to be amended? Please provide details if so.

Are you aware of any evidence to suggest that any other TEF values as listed in the POPs Regulation need to be amended? Please provide details if so.:

No comment

SECTION FIVE: Amendments to Annex V including to Maximum Concentration Limits (for hazardous waste landfill) for several POPs

106 Are the new European Waste Catalogue (EWC) code and Maximum Concentration Limits proposals (1, 2, and 3) of particular importance to you and/or the organisation you represent?

I don't know

107 If you answered yes to question 106, how would they impact you or your organisation? Please provide details, including any supporting evidence or information on potential financial costs, where relevant.

Are you aware of any evidence to suggest that the new EWC code and Maximum Concentration Limit proposals (1, 2 and 3) as set out above would be suitable for adoption within GB? Please provide details if so.:

No comment

108 Are you aware of any evidence to suggest that the new EWC code and Maximum Concentration Limit proposals (1, 2 and 3) as set out above would be suitable for adoption within GB? Please provide details if so.

Are you aware of any evidence to suggest that the new EWC code and Maximum Concentration Limit proposals (1, 2 and 3) as set out above would be suitable for adoption within GB? Please provide details if so.:

No comment

109 Are you aware of any evidence to suggest that the new EWC code and Maximum Concentration Limit proposals (1, 2 and 3) as set out above would not be suitable for adoption within GB? Please provide details if so, including details of any potential financial costs where relevant.

Are you aware of any evidence to suggest that the new EWC code and Maximum Concentration Limit proposals (1, 2 and 3) as set out above would not be suitable for adoption within GB? Please provide details if so, including details of any potential financial costs where relevant.:

EDF is unsure of the impact that will result from the addition of EWC codes and MCL proposal would have if the changes to this derogation was adopted for the permanent storage in hazardous waste landfill or salt mine for future waste arising.

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.:

EDF support the precautionary approach for these waste streams. If implemented it is understood that more wastes will need to be routed to specific disposal routes to ensure destruction / irreversible transformation.

EDF's preference is to prevent POPs being released to the environment by control on the production and manufacture of such chemicals. EDF suggest that, wherever practicable, there is improved regulation of POPs containing products, prior to placement into the marketplace. EDF also request that better product labelling is introduced, enabling a more informed choice to be made at the point of purchase and assist with the waste disposal process.

The amendments proposed have the potential to result in the reformulation and replacement of articles or products in EDF's supply chain. Some of these may be used in nuclear safety applications. In this instance, rigorous processes to identify alternatives, undertake compatibility testing and product qualification to ensure nuclear safety is maintained will need to be adhered to. This would present an increase in additional costs and company resource. It also poses a supply chain risk relating to challenges to source appropriate alternatives, which may impact EDF site operations.

For effective waste management of articles, they need to be easily identifiable as containing such substances. Testing all waste articles for POPs is not practicable. The assessment of the presence POPs in waste, in aged articles, is very difficult. Developing waste sampling methodologies, testing and interpretation of results is expensive and there appears to be limited disposal capacity in the UK. Robust guidance is required to support UK industry with the classification of high-risk articles, testing strategies and approach to take. The WEEE guidance already available provides a basis for this, however EDF would welcome more details as the ultimate outcome of this can still drive conservative decision making to ensure compliance with regulations. This means that opportunities to improve use of the waste hierarchy and recovery of valuable resources is lost.

In parallel with this strategy, there needs to be waste management permitting changes to enable specialist waste management facilities to process POPs wastes. The dual classification of waste articles as mixed hazardous and non-hazardous could allow it to be sent for further identification to allow the correct waste management technique to be identified. EDF consider that waste management facilities are in the best position to segregate similar types of potential POPs and Non-POPs waste articles and to divert recoverable non-POPs waste from incineration, with its associated higher transport and disposal costs.

EDF request that clear guidance is provided on the types of incineration required, noting the associated higher cost and limited availability of high temperature incineration capacity.

As the operator of nuclear power stations in the UK, EDF generates radioactive waste during both operations and decommissioning of its sites. The EDF-owned stations were built in the 1970s and 1980s therefore, it can be assumed that some of the radioactive wastes from these stations will contain POPs in varying concentrations. Full records of what may or may not contain POPs are not available, therefore EDF will be working on risk-based assumptions, i.e. if manufactured prior to certain date then assume POPs.

It is not fully clear whether and how the changes to the POPs regulations will impact radioactive wastes. Based on the definitions in REGULATION (EU) 2019/1021 and DIRECTIVE 2008/98/EC radioactive waste is specifically excluded from the scope of the POPs regulations and therefore should not be affected by these changes. However, there will be an impact because radioactive waste has to meet the hazardous Waste Acceptance Criteria (WAC) of radioactive disposal facilities, such as the Low Level Waste Repository (LLWR), permitted landfill sites and high temperature incinerators. For instance, the LLWR WAC requires information on the levels of hazardous components for wastes "that would be categorised as Hazardous Waste if they were not deemed to be radioactive waste". Industry requires an explanatory note or guidance to clarify this relationship.

This could impact EDF's decommissioning wastes that are more likely to go to landfill compared to our operational wastes. If this change prevents landfill disposal of bulky decommissioning wastes, it could drive behaviours contrary to the UK's policy of minimising radioactive waste volumes consigned to the Low Level Waste Repository (LLWR).

It would be beneficial if it could be clarified as to whether the LLWR falls under the definition of a landfill given in Annex V Part 2 of the POPs regulations.

The majority of EDF's radioactive waste will be incinerated, thus destroying the POPs as a result of the preferred disposal option in any case. However, the proposals should take care to prevent the creation of "undisposable" or "orphan" radioactive wastes whereby their radioactivity is too high to be incinerated but their POP concentration is too high for acceptance to other radioactive waste routes such as near surface disposal i.e. the LLWR. In such a case, it may be more helpful to bring radioactive wastes specifically into scope of the POPs regulations and then to make a suitable provision that would prevent this scenario occurring.

Characterisation of POPs in operational radioactive waste is unlikely to be straightforward because Material Safety Data Sheets or supplier information will not state POPs concentrations. Waste articles and waste from decommissioning or work on old plant components will be even more challenging to determine POPs concentrations. A key concern for EDF is if any change leads to more arduous testing requirements for POPs in radioactive waste, because resource for characterisation of radioactive samples is already at a premium. This may be more suitable for guidance, it would be particularly useful for radioactive waste if there could be a set of standard assumptions to apply to older waste items with regards to POPs levels that would reduce the requirements for testing.

Radioactive waste management requires stable disposal routes with relatively constant waste acceptance criteria. This is critical for decommissioning retired nuclear power stations as the decommissioning strategy and waste management approaches are planned years in advance of waste generation. If this consultation results in significant changes to current WACs for our radioactive waste disposal partners, this could result in:

1. A need to repack and segregate waste - incurring additional risk to staff.
2. A need to change the planned waste management approach for decommissioning - incurring significant programme delays and cost increases.
3. An increase in accumulated waste on EDF sites if it becomes non-disposable e.g. if the activity is too high for incineration and POP concentration too high for other radioactive waste management routes
4. It is not clear how this consultation will impact the WACs for radioactive waste disposals, however significant changes could cause problems for EDF. It would be beneficial to avoid placing additional burden on radioactive sample characterisation capacity.

EDF have attempted to identify which POPs listed within this consultation may present a greater impact to site operations. However, specific feedback on the limits proposed within this consultation have not been provided, as EDF are yet to know what impact this will have on our disposal providers.

EDF is liaising with its waste service providers to understand any implications for disposal of radioactive waste.

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. :