



Department  
for Environment  
Food & Rural Affairs

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[www.defra.gov.uk](http://www.defra.gov.uk)

Your ref:  
Our ref:  
Date: 21 Nov 2012

Dear consultee

## **Consultation on the update to the UK National Implementation Plan (2007) for the Stockholm Convention on Persistent Organic Pollutants**

### **Purpose of this consultation**

This consultation is being carried out by the Department of Environment, Food and Rural Affairs together with the Devolved Administrations for Scotland, Wales and Northern Ireland. Views are sought on the (draft) updated UK National Implementation Plan (NIP) for the Stockholm Convention on Persistent Organic Pollutants (POPs). In particular views would be welcome on the questions listed below.

The updated NIP outlines progress to date and proposes new actions to improve on the previous (2007) NIP and to implement the Convention's requirements for the 9 recently added POPs.

Consultees may wish to consider the following questions when responding.

### **The review of the 2007 UK National Implementation Plan (NIP) for persistent organic pollutants (POPs)**

In the 2007 NIP we set out to gain a better understanding of the diffuse sources of unintentional releases of dioxins (i.e. polychlorinated dibenzo-p-dioxins (PCDDs) and polychlorinated dibenzofurans (PCDFs)), hexachlorobenzene (HCB) and polychlorinated biphenyls (PCBs), and to reduce emissions from these sources.

#### **Question 1:**

On the basis of the review of the UK Dioxins Action Plan attached at Annex 6 of the draft updated NIP, do you consider that:



- (i) the reported trend in the decline in emissions for these substances is representative?
- (ii) we have captured all potential UK sources? and,
- (iii) if not, what improvements would you suggest?

## **The implementation plan for the additional POPs and proposals for action in the updated NIP**

### **Lindane**

The use of the pesticide lindane for treatment of wood used in construction, fencing, railway sleepers and other similar applications started to decline from 1980 until its ban in 2002. This treated wood has an estimated lifespan of 50 years. Emissions to air from this historic use was estimated to be 58 tonnes in 1990 declining to 7.6 tonnes in 2010. However, we believe there may be legacy emissions of lindane to land.

#### **Question 2:**

Would further assessment of the ongoing use of materials containing lindane and potential contamination arising from historic disposal of manufacturing waste be beneficial?

### **Alpha and beta hexachlorocyclohexane**

Alpha and beta hexachlorocyclohexane (HCH) were important components of the pesticide 'technical HCH' which was widely used in the 1940s. This was subsequently replaced by the use of lindane which contains only trace amounts of alpha and beta HCH. The production process of lindane produced 6 – 10 tonnes of waste for every tonne of lindane, which is likely to have been contaminated with alpha and beta HCH. As lindane was produced in the UK until 2002, there may be some remaining waste stockpiles from this industry which contain alpha and beta HCH.

#### **Question 3:**

Would an assessment to establish the amount of potential alpha and beta hexachlorocyclohexane-contaminated waste be beneficial?

### **Pentachlorobenzene**

Our assessment of pentachlorobenzene (PeCB) for the period 1990 to 2010 suggests that current UK emissions come from diffuse sources and not industrial sources as in the 1990s. There has been a significant decline in emissions to air with an estimated decline from 386 kg in 1990 to 35 kg in 2010. Estimated releases of 233 kg to land in 2010 are primarily from the disposal of contaminated ash, notably from diffuse waste combustion sources.

Overall the emissions of PeCB have declined to 10% of those in 1990.

#### **Question 4**

Should we consider how to improve the disposal of contaminated ash from diffuse combustion sources and, if so, how could this be achieved?

#### **Emissions from consumer products and domestic activity**

##### 1. Uncontrolled emission to the environment

Emissions of POPs to the environment are regulated for certain consumer appliances and goods. For example, the disposal of waste generated from electronic equipment containing flame retardant POPs is regulated, whereas items such as fabrics, furniture, etc. containing POPs are not. Therefore they remain a potential source of POPs emissions to the environment for a long time.

#### **Question 5:**

How could we measure emissions of POPs, e.g. Polybrominated diphenyl ethers (PBDE), perfluorooctane sulphonic acid (PFOS), from unregulated consumer products?

#### **Question 6:**

What opportunities might there be to reduce/control such emissions?

##### 2. Polybrominated diphenyl ethers (PBDEs)

Recent research shows indoor pathways (principally via ingestion or dermal contact with settled dust, but also inhalation) contribute strongly to UK human exposure to PBDEs. The contribution is especially marked for decabromodiphenyl ether where concentrations in UK indoor dust are especially elevated, exceeding levels reported in other European countries. The widespread use of PBDEs as flame retardant additives in consumer goods and materials is the likely source of this contamination.

#### **Question 7**

What steps do you consider could be taken to reduce human exposure to PBDEs found in indoor dust?

##### 3. Backyard burning

A survey undertaken as part of our action in the 2007 NIP identified that the reasons for not burning plastics were well understood by the public. However, there was a poor understanding of the impacts of burning treated wood and tyres. Both materials emit dioxins and furans. Local authority websites already provide very good information to meet public needs on a range of issues. We consider that this is the most cost-effective way of raising awareness about good practice.

#### **Question 8**

What other low-cost options could be considered to improve knowledge and raise awareness about what should not be burned in the backyard?

### **Ongoing monitoring of emissions**

We have developed and established multi-vector source inventories for dioxins, furans and PCBs. These inventories were set up under the 2007 NIP. The data is showing a continuing decline in the emissions of these POPs to air, land and water over a period of 20 years.

### **Question 9**

We intend to redirect resources towards monitoring of the more recently listed POPs. Do you foresee any problems with this approach?

### **How to Respond**

When responding please state whether you are responding as an individual or representing the views of an organisation. If responding on behalf of an organisation, please make it clear who the organisation represents and, where applicable, how the views of members were assembled.

Please submit your responses by email to the following address.

Email: [Chemical.Management@defra.gsi.gov.uk](mailto:Chemical.Management@defra.gsi.gov.uk)

A list of those organisations and individuals to whom this consultation document has been sent is provided in Annex 1 and includes, amongst others, manufacturers, the chemical industry, consumer organisations, enforcement authorities, Government Departments and non-Governmental organisations. Please inform us if you know of others who may wish to be involved in this consultation process.

### **When are comments required by?**

Comments should be sent to Defra by **21 December 2012**. Earlier responses are most welcome.

### **Confidentiality**

In line with Defra's policy of openness, at the end of the consultation period copies of the responses we receive may be made publicly available through the Information Resource Centre (Defra Library) at Nobel House, 17 Smith Square, London SW1P 3JR. The information they contain may also be published in a summary of responses. If you do not consent to this, you must clearly request that your response be treated confidentially. Any confidentiality disclaimer generated by your IT system in e-mail responses will not be treated as such a request. The library will supply copies of consultation responses to personal callers or in response to telephone or e-mail requests (tel: 020 7238 6575, e-mail: [defra.library@defra.gsi.gov.uk](mailto:defra.library@defra.gsi.gov.uk)). Wherever possible, personal callers should give the library

at least 24 hours' notice of their requirements. An administrative charge will be made to cover photocopying and postage costs.

Copies of any responses from organisations based within Northern Ireland, Scotland or Wales will also be sent to the relevant Devolved Administration.

If you wish to make a complaint, or query the consultation process (as opposed to comments about the issues which are the subject of the consultation), please write to Arwyn Davies, Deputy Director, Chemicals and Emerging Technologies, at the above address and Marjorie Addo, Consultation Coordinator. If your concern remains unresolved following this, please write to:

Olaoluwa Osinibi - Consultation Coordinator

Defra

Room Area 2D

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London SW1P 2AL

### **Data Protection Act 1998**

The Secretary of State for Environment, Food and Rural Affairs is the data controller, as defined in Section 1 of the Data Protection Act 1998 (DPA), in respect of any “personal data” that you provide in response to this consultation exercise. “Personal data” is information about an individual such as their name, contact details and opinions.

All responses to this consultation will be made publicly available, unless specifically requested in your response. The information contained in your response and any supporting documents will be shared with other officials in government, the Devolved Administrations and regulatory bodies such as the Environment Agency.

Your response to this consultation document may be made publicly available in whole or in part at the Department’s discretion. If you do not wish all or part of your response (including your identity) to be made public, you must state in the response which parts you wish us to keep confidential. Where confidentiality is not requested, responses may be made available to any enquirer, including enquirers outside the UK, or published by any means, including on the internet.

### **Help with Queries**

If you have any questions about the issues discussed in this consultation document, please contact Olaoluwa Osinibi using the above contact details.

### **The Consultation Code of Practice**

The complete code of practice is available on the Cabinet Office website at:

[www.cabinetoffice.gov.uk/resource-library/consultation-principles-guidance](http://www.cabinetoffice.gov.uk/resource-library/consultation-principles-guidance)