



CHEMTrust

Protecting humans and wildlife
from harmful chemicals

Consultation response

“DEFRA consultation on draft indicators framework for the 25 Year Environment Plan”

Comments from CHEM Trust

January 2019

1. Introduction

CHEM Trust welcomes the opportunity to respond to this consultation, as we believe that a chemicals policy should feature as a key priority in the Government's 25 Year Environment Plan.

CHEM Trust is a UK registered charity that works at European, UK and International levels to prevent man-made chemicals from causing long term damage to wildlife or humans, by ensuring that chemicals which cause such harm are substituted with safer alternatives.

We are also an accredited stakeholder at the European Chemicals Agency and an active member of the UK Chemicals Stakeholder Forum; we are also a member of the EDC Free Europe coalition, the European Environment Bureau and the International POPs Elimination Network.

2. Goal 10: Exposure to Harmful Chemicals

Firstly, we support the proposed indicators relating to the exposure to harmful chemicals, but would argue that all three (H25, H26 and H27) should be considered as relevant to the 25 Year Environment Plan target – currently H26 and H27 are not.

We would also stress the importance of including the following additional indicators as part of Goal 10:

- To keep a national register of all new Restrictions¹ and chemicals that enter the Authorisation process in REACH², and set targets and timelines relating to emissions for each new Restriction and Authorisation.
- To track the reduction of banned chemicals in products. There could be an indicator with the number of checks for enforcement of chemical restrictions carried out on consumer products and the number of samples which were found to be illegal.

¹ <https://echa.europa.eu/substances-restricted-under-reach>

² <https://echa.europa.eu/authorisation-list>

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CHEM Trust also calls on the government to dedicate additional resources for research budgets on the emissions of harmful chemicals to the environment, and the impacts of these emissions on the environment and public health. We would like to see this alongside the routine monitoring that already exists.

Indicator H25: Emissions of nationally significant substances to the water environment

Indicator H25 aims to track '*nationally significant substances entering the water environment from measured, calculated and modelled sources*' but links to a pollution inventory recording only a restricted list of pollutants discharged to the environment by factories.

H25 does not cover emissions from products or at the point of use, for example chemicals of concern present in cosmetics that contaminate sewage treatment plants or chemicals that are released from furniture and building products.

CHEM Trust would like to suggest that monitoring the concentration of hazardous substances in surface water, ground water, coastal water and sediment would be a good way to track hazardous substances in the environment. It is not clear if this is covered by **indicators H3 and S5 from goal 2, 'Quality and quantity of water'**. Further, there is no mention of human biomonitoring data - the indicator only covers wildlife, despite mention of biomonitoring within the 25 Year Environment Plan itself.

All substances of regulatory interest (e.g. all SVHCs on ECHA's candidate list³, all substances in the REACH Restrictions process⁴) need to be reported on. The current dataset does not include any emerging chemicals of concern that have been recognised as potentially hazardous only recently. Even Bisphenol A (BPA), which has been subject to many regulatory measures in recent decades and which was added to ECHA's candidate list in 2017 is missing. We want to see the pollution inventory updated to include all substances of regulatory interest, kept under constant review and updated every two years.

European Pollutant Release and Transfer Register and EU Departure

We would also like to query the future of the UK PRTR⁵ within the context of the UK's departure of the EU. Will the UK continue to compile and report annual pollutant release data to air, land and water from industrial operators for submission to the EU under the European PRPR (E-PRTR)? This resource is a valuable contribution to transparency and public participation in environmental decision-making, which, regardless of the outcome of Brexit, should remain a key feature of Defra's indicators framework.

Resources for use

- ***REACH Baseline Study***

We would like to refer Defra to the REACH Baseline Study⁶ as a resource for the above suggestions on data collection. The REACH Baseline Study monitored the effectiveness of REACH regarding risk reduction and improvement of the quality of data available for the assessment of chemicals. This method assesses each substance using a risk score (calculated based on estimations of exposure and toxicity) and a quality score, calculated for impacts on workers, the environment, consumers and human health via the environment.

³ <https://echa.europa.eu/candidate-list-table>

⁴ <https://echa.europa.eu/substances-restricted-under-reach>

⁵ <https://www.gov.uk/guidance/uk-pollutant-release-and-transfer-register-prtr-data-sets>

⁶ REACH Baseline Study – 10 Years Update <https://publications.europa.eu/en/publication-detail/-/publication/53d3094a-f101-11e7-9749-01aa75ed71a1/language-en>

- **EEA Briefing on the consumption of hazardous chemicals**

A briefing on the Seventh Environment Action Programme (EAP) of the European Environment Agency⁷, which includes an objective to assess and minimise the health and environmental risks associated with the use of hazardous substances. The briefing highlights the gaps that exist in the evidence base for assessing risks of hazardous substances and may be of use to Defra.

3. Goal 13: resources efficiency and waste

CHEM Trust welcomes that goal 13 includes the **indicator H33 ‘Hazardous chemicals preventing recycling’**. A Circular Economy is a crucial component of a future-focussed, sustainable, economy. However, harmful chemicals present in our waste can disrupt the circular economy, including banned chemicals present in products due to be recycled (for example. furniture). Therefore, we would like to see this indicator not only tracking persistent organic pollutants and polychlorinated biphenyls in waste, but also Carcinogenic, Mutagenic and Reprotoxic chemicals (CMRs) and Endocrine Disrupting Chemicals (EDCs).

4. Goal 7: health and diversity of our seas

Goal 7 does not seem to include an indicator that tracks the concentration of harmful chemicals in the sea. The sub-headline **indicator S8 ‘clean seas: marine litter’** is described as gathering data based on beach cleaning, therefore covering only micro and macro particles but not substances. This is a gap that should be addressed, one solution could be to use data from Marine Monitoring programmes like the Marine Environment Monitoring and Assessment National database (MERMAN)⁸.

Julie Schneider, Campaigner, CHEM Trust, 23rd January 2019.

⁷ Environmental indicator report 2018 – In support of the monitoring of the seventh Environment Action Plan. EEA report, November 2018. <https://www.eea.europa.eu/airs/2018/environment-and-health/production-of-hazardous-chemicals>

⁸https://www.bodc.ac.uk/projects/data_management/uk/merman/assessments_and_data_access/