
Chemicals policy and regulation update**Index**

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1. Update on REACH issues:

Consultations

Consultation on the SEAC draft opinion on the proposed restriction of polycyclic-aromatic hydrocarbons (PAHs) content in granules and mulches used as infill material in synthetic turf pitches and in loose forms on playgrounds and in sports applications had a deadline of 19 August 2019. RAC adopted its draft opinion in support of the proposal; SEAC have agreed its draft opinion in support of the proposal and expect to adopt an opinion in its September meeting.

[Calls for evidence](#) are underway on lead in certain articles supplied to the public. The purpose of the calls is to gather evidence to help ECHA review certain derogations to entry 63 of the Restrictions List; lead and its compounds. The deadline is 19 September 2019.

[Consultation is underway on the proposed restrictions of skin sensitising substances and perfluorohexane-1-sulphonic acid \(PFHxS\), its salts and related substances.](#) The deadline is 19 December.

[Consultation is underway for various applications for authorisation covering uses of the following substances,](#) with a deadline of 9 October 2019.

- 4-(1,1,3,3-tetramethylbutyl)phenol, ethoxylated
- Anthracene oil
- Chromium trioxide
- Pitch, coal tar, high temp

[Consultation is underway for four proposals to identify SVHCs,](#) as follows, with a deadline of 18 October 2019.

- 2-benzyl-2-dimethylamino-4'-morpholinobutyrophenone - used in polymer production
- 2-methyl-1-(4-methylthiophenyl)-2-morpholinopropan-1-one - used in polymer production
- Diisohexyl phthalate - not registered under REACH
- Perfluorobutane sulfonic acid (PFBS) and its salts – used in polymer production

Restriction

[The RAC and SEAC final opinion to restrict substances used in tattoo inks and permanent make up](#) is available on ECHA's website.

[The Commission has updated the REACH Restrictions List \(Annex XVII\) adding entry 73: \(3,3,4,4,5,5,6,6,7,7,8,8,8-tridecafluorooctyl\) silanetriol and any of its mono-, di- or tri-O-\(alkyl\) derivatives \(TDFAs\).](#)

The Commission has [requested ECHA to prepare a restriction proposal on the placing on the market and use of lead in ammunition and fishing tackle](#). ECHA have previously prepared a restriction dossier on the use of lead shot over wetlands. The proposal is with the Commission for decision making.

[ECHA plan to submit a restriction dossier on lead chromates](#) on 27 September 2019.

[Germany plan to submit a restriction dossier on undecafluorohexanoic acid \(PFHxA\), its salts and related substances](#) on 20 December 2019.

ECHA has submitted a [dossier in support of a proposal to restrict the use of calcium cyanamide as a fertiliser](#). The report is available on ECHA's website and a public consultation is expected to follow once RAC and SEAC agree on its conformity.

[ECHA withdrew the intention to restrict the placing on the market of childcare articles and residential upholstered furniture with PUR foams containing three flame retardants TCEP, TCPP and TDCP](#). This is due to critical data not being available within the original 12-month timeline required to complete the dossier (US NTP studies on the carcinogenicity of TCPP).

[ECHA have published an update relating to the restriction proposal for intentionally added microplastics in the EU](#). This relates to media reports that the proposals will result in the closure of thousands of artificial turf pitches across the EU. ECHA state that they or the Commission are not proposing to close down artificial turf pitches.

ECHA has published a Q&A document on the proposed restriction on intentionally added microplastics. This is to help clarify aspects of the restriction and provide support to those responding to the consultation; deadline of 20 September 2019. Link [here](#).

ECHA have published new guidelines for industrial users of NMP (1-methyl-2-pyrrolidone) to help them comply with the restriction requirements; being the first restriction of its kind that is based on derived no effect levels. Link [here](#).

Evaluation

ECHA have published substance evaluation conclusions for the following substances:

- Triphenyl phosphite - evaluated by UK; Link [here](#).
- 2,2'-methyliminodiethanol - evaluated by UK; Link [here](#).
- bis(nonafluorobutyl)phosphinic acid - evaluated by Germany; Link [here](#).
- formaldehyde - evaluated by France and co-evaluated by the Netherlands; Link [here](#).
- A mixture of: N,N'-ethane-1,2-diylbis(decanamide);12-hydroxy-N-[2-[1-oxodecyl]amino]ethyl]octadecanamide;N,N'-ethane-1,2-diylbis(12-hydroxyoctadecanamide) - evaluated by Spain; Link [here](#).
- Reaction mass of 4,4'-methylenediphenyl diisocyanate and o-(p-isocyanatobenzyl)phenyl isocyanate / methylene diphenyl diisocyanate - evaluated by Estonia; Link [here](#).
- 2-ethyl-2-[[[(1-oxoallyl)oxy]methyl]-1,3-propanediyl diacrylate - evaluated by France; Link [here](#).

Authorisation

The Aerospace and Defence Chromates Reauthorisation (ADCR) Consortium plan to hold a launch meeting in Brussels on 20th September inviting companies from this sector. **This new consortium is dedicated to applying for the re-authorisation of the use of chromates in this sector.** Link [here](#).

ECHA has submitted a recommendation to the Commission for amending the Authorisation List entries for four phthalates to include their endocrine-disrupting properties; DIBP; DBP; BBP; DEHP. The Commission have yet to decide on the amendment, and when they do, some previously exempted uses of the substances may require authorisation. Link [here](#).

The RAC and SEAC opinion on one application for authorisation is available on ECHA's website for the use of trichloroethylene by SPOLANA s.r.o., for use as an extraction solvent in caprolactam production. Link [here](#).

The Commission has granted authorisations for uses of the following substances. Link [here](#).

- bis(2-methoxyethyl) ether (diglyme) to Roche Diagnostics GmbH - as a process chemical in the manufacture of one specific type of Dynabeads® used in immunodiagnostic assays (in vitro diagnostic)
- bis(2-methoxyethyl) ether (diglyme) to Life Technologies - as a process chemical in the manufacture of Dynabeads®
- arsenic acid to Circuit Foil Luxembourg SARL - for the treatment of copper foil used in the manufacture of printed circuit board

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- bis(2-methoxyethyl) ether to N.V. Ajinomoto OmniChem S.A. - as a solvent for the synthesis of the anti-HIV active pharmaceutical ingredient dapivirine
 - sodium dichromate to H&R Ölwerke Schindler GmbH; H&R Chemisch-Pharmazeutische Spezialitäten GmbH - as a corrosion inhibitor in ammonia absorption deep cooling systems, applied for the dewaxing and deoiling process steps of petroleum raffinate
 - ammonium dichromate to Display Technologies Limited - for use in the process of manufacturing Cathode Ray Tubes for head-up displays intended to be used in military and civilian aircrafts
 - ammonium dichromate to BAE Systems (Operations) Limited; Qioptiq Ltd - for use in the process of manufacturing holographic combiners for diffractive head-up displays intended to be used in military aircrafts
 - chromium trioxide to ZF Friedrichshafen AG - for use as functional chrome plating of piston rods for automotive and rail applications
 - pentazinc chromate octahydroxide to Indestructible Paint Ltd - for two uses: use in stoved epoxy primer for corrosion protection of aircraft engine components in aerospace and aeroderivative applications and use in the formulation of mixtures
 - bis(2-methoxyethyl) ether (diglyme) to PMC ISOCHEM - for use as a process solvent in one step of the manufacturing of an Active Pharmaceutical Ingredient used in an anti-protozoal drug

SVHCs

New intentions for identification as a substance of very high concern has been received for:

- diisohexyl phthalate by Sweden. Link [here](#).
- 4,4'-(1-methylpropylidene)bisphenol by France. Link [here](#).
- Resorcinol by France. Link [here](#).

The following substances have been added to the Candidate List of SVHCs for authorisation; companies may have new legal obligations with respect to these substances. Link [here](#).

- 2-methoxyethyl acetate
- Tris(4-nonylphenyl, branched and linear) phosphite (TNPP) with $\geq 0.1\%$ w/w of 4-nonylphenol, branched and linear (4-NP)
- 2,3,3,3-tetrafluoro-2-(heptafluoropropoxy)propionic acid, its salts and its acyl halides (covering any of their individual isomers and combinations thereof)
- 4-tert-butylphenol

Reports, Guidance & Updates

ECHA published information:

- Communications strategy document (2019-2023) – covering ECHA’s communication intentions. Link [here](#).
- Web pages on the REACH Exposure Expert Group (REEG) - this group of experts focuses on uses and exposure issues. Link [here](#).
- Report on National helpdesk activities - the annual report for year 2018. Link [here](#).
- Report on downstream users’ information needs under REACH - on the findings of market studies in 2017-2018 on the on the flow of safe use information in the supply chain. Link [here](#).
- Report on formaldehyde exposure - an investigation report on the exposure and risk posed by formaldehyde to workers. Link [here](#).
- Information requirements for the upcoming database on articles containing Candidate List substances (SVHCs); the database is aimed to improve transparency on hazardous substances in articles. Link [here](#).
- Guidance on preparing a scientific report for health-based exposure limits and occupational exposure limits (OELs) in the workplace (aligning the methodologies in REACH and occupational health and safety legislation to establish safe levels of exposure to chemicals in the workplace). Link [here](#).
- Background note on the options to address non-extractable residues (NER) in regulatory persistence assessment. Link [here](#).

ECHA updates:

- **ECHA plan to evaluate more registration dossiers in each tonnage band with the aim of improving registration compliance.** The Commission is expected to propose an amendment to REACH to raise the minimum target for compliance checks of registration dossiers from 5% to 20%. Link [here](#).
- **ECHA plan to improve authorisation and evaluation**, which includes changes to the formats used in the authorisation application process. Link [here](#).
- **ECHA’s chemicals database has been updated to allow for new features and improvements**, including: new information in substance infocards, quick links to deeper datasets for each substance and more visibility on nanomaterials. Link [here](#).
- **A new search tool for nanomaterials has been published on the European Union Observatory for Nanomaterials (EUON) website** allowing users to search for nanomaterials that are currently on the EU market. The results are linked to ECHA’s database of chemicals registered in the EU. Link [here](#).

Workshops:

- **ECHA workshop on workability and quality of SDSs (23-24 September 2019)** aims to give experienced SDS authors and risk assessors an opportunity to discuss how the extended SDS, related flows of information and IT tools could be further developed to better meet the needs of different actors in the supply chain. Link [here](#).
- **Meeting of the Exchange Network on Exposure Scenarios (ENES 12) (21 November 2019)** aims to inform companies about approaches and tools that can help make supply chain communication more structured and efficient and also aims to help increase understanding of the practical value of information in the extended SDS for ensuring safe work places and products. **It is especially targeted to those who are not yet aware of the ENES activities.** Link [here](#).

2. International Chemicals: Multilateral Environmental Agreements (MEAs)

2.1 Stockholm Convention – Persistent Organic Pollutants

The EU recast of the POPs regulation [2019/1021](#) came into force on 15 July 2019. The main changes include giving technical, scientific and administrative responsibilities to ECHA; the introduction of EC procedural changes to make amendments to the annexes; alignment with other EU regulations and Directives through the use of dynamic definitions; introducing a requirement to track and control POPs waste and; an updated reporting process.

The revised regulation brings into force requirements to ban the use of decabromodiphenyl ether; decaBDE and Alkanes C₁₀-C₁₃, chloro (short-chain chlorinated paraffins) (SCCPs), with some exemptions. It also required these substances to be destroyed in waste above specified limits.

The requirement to control and track POPs waste does not apply immediately but measures should be put in place in accordance with the requirements to track hazardous waste in the Waste Framework Directive. **A revised EU Exit regulation has been drafted and we expect this to be in force by the time we leave the EU.**

The substances banned and restricted at the last Stockholm Convention, conference of parties in May, will be subject to further legislation next year. The next POPs Review Committee (POPRC) meeting is from 1st to 4th October 2019. The UK will be attending as observers and have been actively involved in the commenting rounds on the dossiers planned for further discussion at this

meeting. These include the Risk Management Evaluation for the nominated substance, PFHxS. Also, under discussion will be two newly nominated substances Methoxychlor, a pesticide and the flame retardant Dechlorane plus. The discussions on these will focus on whether the properties of these two substances meet the criteria of a POP. Additionally, the exemptions for DecaBDE and SCCP will be considered. **Any party still needing to use these substances for any of the specified uses stated in the exemptions need to inform the secretariat of the Stockholm Convention.**

2.2 Rotterdam Convention – Prior Informed Consent

The Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade is a multilateral treaty to promote shared responsibilities in relation to importation of hazardous chemicals.

The fifteenth meeting of the Chemical Review Committee, the scientific body to the Rotterdam Convention, will be held on 8-10 October 2019. For information, the meeting agenda and meeting documents can be found [here](#). The Committee will discuss candidate chemicals for listing including amitrole, decabromodiphenyl ether as well as nonylphenols ethoxylates.

Defra will also be starting a process of considering priorities for the Rotterdam Convention for the next Conference of the Parties in 2021. Any potential proposals from the UK will be shared in due time.

3. International Chemicals: Voluntary international initiatives

3.1 Strategic Approach to International Chemicals Management (SAICM)

The [Strategic Approach to International Chemicals Management \(SAICM\)](#) is a voluntary, multistakeholder, multisectoral global framework that aims to improve chemical management in all countries, including closing gaps between developed and developing countries regarding chemicals and waste management. Its current goal, which is reaffirmed in the Sustainable Development Goal 12.4, is: *“to achieve the sound management of chemicals throughout their life-cycle so that, by 2020, chemicals are used and produced in ways that lead to the minimization of significant adverse effects on human health and the environment.”*

It operates alongside and complements the multilateral environmental agreements for chemicals and waste i.e. the Basel, Stockholm, Rotterdam and Minamata Conventions. As SAICM's current mandate concludes in 2020, there is a post 2020 framework process to consider how best to take forward activity in this area.

The Open Ended Working Group (OEWG) took place in April and the outcome of negotiations is available on their website, referred to as '[Outcomes of the contact group on the Strategic Approach and the Sound management of chemicals and waste beyond 2020](#)'.

At the OEWG the UK offered to host a workshop to consider the indicators that might be developed to measure progress against the targets as currently drafted for the post 2020 process. This workshop was held between 3-5 September and brought together nearly 50 experts in chemicals and wastes from 30 countries around the world. The outputs will be reported at the next intersessional meeting at the beginning of October.

Preparations for the next inter-sessional meeting, which will consider the targets for beyond 2020, governance structures and the science/policy interface, have been ongoing over the summer. The main engagement with the UKCSF is through the SAICM sub-group to the CSF, which met on Tuesday 20th August. If you would like to be involved in this sub-group in future, please let us know.

We are particularly interested in hearing about the ways in which industry is adapting, or preparing to adapt, to new challenges in the sector. This helps us to be aware of the innovation happening in the industry and how this best practice might be applicable elsewhere in the world. **For example, if you know of examples of existing industry programmes to encourage the sustainable use of chemicals in specific sectors or more broadly we would welcome hearing about them.**

Further info: [Strategic Approach to International Chemicals Management \(SAICM\)](#)

UK objectives

Our overarching objective is to support an improved enabling framework under SAICM that can mobilise increased political commitment, leadership and ambition for all actors. We support the current strategic objectives and are keen to see targets that are achievable, measurable and time bound.

We are also particularly interested in ways to strengthen the Science-Policy Interface through enhanced collaboration between scientists and decision-

makers. We would like to raise the public profile of the scientific evidence in chemicals and wastes to inform the global debate.

4. The OECD's Environment, Health and Safety (EHS) Programme.

The EHS programme deals with the safe use of chemicals, nanomaterials, pesticides, biocides, and products of modern biotechnology. It also addresses related areas of concern and interest, such as chemical accidents and Pollutant Release and Transfer Registers (PRTRs). Its aims are: to protect health and the environment, while avoiding duplication of effort and ensuring that efficiencies are made and barriers to trade avoided. A useful overview of the programme and its work can be found [here](#).

Defra continues to have oversight of the EHS programme through attendance at the Joint Meeting of the Chemicals Committee and the Working Party on Chemicals, Pesticides and Biotechnology which last met in June 2019. Key updates are below.

Interested in OECD updates on chemical safety? **Sign up to [MyOECD](#) and subscribe to Chemical Safety News.**

Saving Costs in Chemicals Management: How the OECD ensures benefits to society

This update to the OECD's 2010 Cutting Costs in Chemicals Management Report published this year provides an overview of the benefits of OECD work, estimating that that these produce savings to governments and industry of more than EUR 309 million per year. A major basis for the generation of savings is the Mutual Acceptance of Data (MAD) system which reduces duplication of chemical testing. This also significantly reduces animals in testing, by an estimated 32,702 for industrial chemicals. The MHRA is now working with OECD to realise additional benefits of MAD to the pharmaceutical industry in a follow on report. The Saving Costs in Chemicals Management report can be found [here](#).

Test Guidelines

Defra is fulfilling an action posed in the 25 Year Environment Plan to work to strengthen the standardisation of methods that assess chemical safety in support of MAD through the OECD. Defra and Cefas have worked with Switzerland to modernise the fish acute toxicity test ([TG203](#)), which was published by the OECD this year. Defra funded Cefas to join the international inter-laboratory validation assessment of the Rapid Androgen Disruption Adverse outcome Reporter (RADAR) assay, a key step to confirming the effectiveness of the method and the publication of the new test guideline. **A new test guideline**

is also being supported by the UK in collaboration with the Netherlands on a New TG on Growth Inhibition Test for the Rooted, Emergent Aquatic Macrophyte, *Glyceria maxima*, which was introduced onto the Test Guidelines Programme this year. The current work plan of the Test Guidelines Programme can be found [here](#).

Nanomaterials

With the REACH Annex amendments for nanomaterials around the corner **the UK is engaging with the Working Party on Manufactured Nanomaterials (WPMN) to amend existing and develop new test guidelines and guidance documents in collaboration with European partners.** We are scoping work to consider how TG305 (fish bioaccumulation test) can be waived to avoid excessive use of animals in testing to meet assessment requirements.

Defra and PHE will attend a meeting of the WPMN to discuss priorities for its programme of work for 2021-24. This will also focus on how issues surrounding advanced materials can be addressed in the context of chemicals management.

Global Forum on Chemicals Management

The OECD intends to hold a Global Forum on Environment dedicated to Chemicals Management in November 2020, back to back with the 61st Joint Meeting and following the 5th International Conference on Chemicals Management ICCM5. This intends to discuss challenges with setting up and implementing an industrial chemicals management system and to share best practices. Global Forums provide a venue that brings together international experts from member and non-member economies and as such, attendance is broader than traditional OECD meetings.

Aligning chemicals and waste legislation: case studies

We are interested in working with the CSF to provide input to this project (see September emails). The Joint Meeting and the Working Party on Resource Productivity and Waste (WPRPW) are working together to collect case studies of policy mis-alignment at the chemical/waste interface. These aim to foster a discussion on real-world policy mis-alignment at the chemicals/waste interface in order to discuss and identify potential, or already applied, solutions. The case studies will be discussed at a workshop in conjunction with the 60th Joint Meeting in early February 2020. A summary document of the workshop, along with the case studies, will then be published.

5. Broader policy issues

The Chemicals Strategy

In the 25 Year Environment Plan, the government committed to publishing a Chemicals Strategy. The Chemical Strategy will set out our ambitious approach towards ensuring the safe management of chemicals, our priorities for action, and details of how we will achieve our goals. We are collaborating with other government departments to develop the Strategy.

The Strategy will be produced in two parts: we will publish a discussion document, incorporating a call for evidence, by March 2020, and publish the final Strategy by 2022.

At this early stage in the Strategy's development, **no issues related to chemicals are being treated as out of scope** and our thorough programme of engagement will help shape our ambitious vision. The work over summer focused on initial conversations with stakeholders to understand the issues and priority areas that the Strategy could address. The engagement activities included focus groups with members of the UKCSF. Following the next CSF meeting, there will be further opportunities to feed into Strategy development, which will be communicated in due course.

Net zero and COP26

The UK has set a target that will require it to bring all greenhouse gas emissions to net zero by 2050, compared with the previous target of at least 80% reduction from 1990 levels. For further details see [here](#). (Please note the Green GB week referenced will no longer be taking place in November).

Update on the UK's bid to host COP26, in partnership with Italy

On September 10 the UK received a huge boost for our work to tackle climate change as international allies formally gave their backing for Britain to host COP26 in 2020.

The event in Glasgow next year will be the UN's 26th climate change conference, and bring together over 30,000 delegates from around the world, including climate experts, business leaders and citizens to agree ambitious action to tackle climate change.

This announcement means the UK is now officially backed by the group of countries responsible for nominating the 2020 host.

This follows the PM's commitment at the G7 Summit in Biarritz to ensure that the COP26 Summit addresses both climate change and biodiversity as two sides of the same coin.

We expect the UK's nomination to be formally accepted at December's COP25 summit in Chile and we will host COP26, in partnership with Italy, in Glasgow in 2020.

6. Update from Devolved Administrations

Scotland

As mentioned in the last UKCSF policy update, Scotland is setting up a similar forum to improve its understanding and policy making in this area. This will be linked to the UKCSF. **Anyone interested in participating in such a forum is encouraged to email a note of interest to jason.sharp@gov.scot and louise.cameron@gov.scot.**

7. Chemical-product-waste interface subgroup

The UKCSF subgroup has met twice thus far, beginning in June 2019.

The group includes representatives from:

- Chartered Institute of Wastes Management
- Chemicals Industries Association
- Environmental Services Association
- Resource Association
- Make UK
- Tech UK
- Defra
- Environment Agency

Aim of group and key issues

The agreed aim of the group, and key issues to tackle are as follows:

To ensure that products are managed in a way that recognises the dual needs to optimise both protection of human health and the environment and maximise resource efficiency. This involves dealing with the legacy of chemicals which contaminate waste streams and putting in place systems that prevent future problems.

These issues are evident in the following ways:

- (i) **Current EU rules on waste and hazardous chemicals are not well aligned and this affects the uptake of secondary raw materials.** E.g. Waste may contain substances that are no longer allowed in new products, limiting its recyclability and resulting in a waste of potentially useful resources.
- (ii) **The presence of chemicals may prevent recycling,** make it difficult to sort wastes or reduce the quality and value of secondary raw materials.
- (iii) **The presence of chemicals may make remanufacture of products difficult.**
- (iv) **Recyclers/waste managers are often not aware of the presence of regulated chemicals in the waste they receive** as the information is not readily available, particularly pertinent with the rise of online purchasing of goods from overseas. This can lead to inappropriate management.
- (v) **Limitations in available technology (and/or capacity) may prevent the environmentally sound management of wastes containing chemicals,** as well as limiting opportunities to realise the value of these wastes.

OECD case studies on real-world policy misalignment at the chemicals/waste interface

One of the initial outputs of the group is to contribute case studies towards an OECD initiative. **In June 2019 the OECD Chemicals Committee and the Working Party on Resource Productivity and Waste supported moving forward on a project examining case studies of policy misalignment at the chemical/waste interface.** The case studies collected aim to foster a discussion on real-world policy misalignment at the chemicals/waste interface in order to discuss and identify potential, or already applied, solutions. The case studies will be discussed at a workshop in conjunction with the 60th Joint Meeting of the Chemicals Committee and the Working Party on Chemicals, Pesticides and Biotechnology (Joint Meeting) in early February 2020. A summary document of the workshop, along with the case studies, will be published. **Both the Joint Meeting and the Working Party on Resource Productivity and Waste are being solicited for case studies.** Country delegates between the two groups are encouraged to collaborate on submissions.

The UK will be contributing to this initiative with the assistance of industry. Please do contribute your case studies, as per email requests to all CSF attendees.

European Union

The European Commission has identified the chemical-waste interface as an area to address. In 2018, it published a communication, setting out four issues and actions to address them. These are:

- Issue 1: **information on presence of substances of concern is not readily available to those who handle waste** and prepare it for recovery. Planned action: the Commission intends to launch a feasibility study on the use of different information systems, innovative tracing technologies and strategies; the study is expected to be completed by the end of 2019.
- Issue 2: **waste may contain substances that are no longer allowed in new products**. Planned action: the Commission intends to develop, by mid-2019, a specific decision-making methodology to support decisions on the recyclability of waste containing substances of concern.
- Issue 3: **EU rules on end-of-waste are not fully harmonised, making it uncertain how waste becomes a new material and product**. Planned action: the Commission intends to facilitate closer cooperation between existing chemical and waste management expert networks and to prepare an on-line EU repository for all adopted national and EU end-of-waste and by-product criteria.
- Issue 4: **rules to decide which wastes and chemicals are hazardous are not well aligned and this affects the uptake of secondary raw materials**.

Planned action: the Commission is about to publish a guidance document on waste classification to assist waste operators and competent authorities to have a common approach to waste characterisation and classification.

The European Parliament have stressed that **preventing hazardous materials entering the material cycle should be the primary aim**, and that greater transparency is required on the presence of substances of concern in consumer products, for instance through a product passport.

Future role of the sub-group

Defra is currently developing a chemicals strategy. Initial focus groups have confirmed that issues at the chemicals-products-waste interface are of interest to many stakeholders. The strategy will explore these issues and we expect that the sub-group will play an important role in this.

We would welcome more members of the sub-group. Please let us know if you could join the group.