

## July 2023 Meeting of UK Chemicals Stakeholder Forum Includes Update on UK REACH

Article By:

Lynn L. Bergeson

Carla N. Hutton

---

During the United Kingdom (UK) Chemicals Stakeholder Forum's (UKCSF) [July 20, 2023, meeting](#), UKCSF received updates from the Department for Environment, Food and Rural Affairs (Defra) and the Health and Safety Executive (HSE) on UK REACH. According to the UKCSF Chemicals policy and regulation update, Defra, along with Welsh and Scottish governments, worked with HSE, the Environment Agency, and a wide range of stakeholders, including non-governmental organizations (NGO) and trade associations, to identify priorities for the UK REACH Work Programme in 2023-2024. The update states that since UK REACH came into force, the Work Programme has prioritized the issues that are most effectively addressed through UK REACH and where action would have the greatest impact for human health and the environment. The UK REACH Work Programme 2023-2024 "will be published in due course and will be accompanied by an updated rationale setting how we identified priorities for this financial year."

As reported in our April 12, 2023, [blog item](#), on April 4, 2023, HSE published a [regulatory management option analysis](#) (RMOA) for per- and polyfluoroalkyl substances (PFAS). The update states that Defra ministers have accepted the RMOA's recommendations, which include reducing PFAS emissions by developing UK REACH restrictions, beginning with a restriction on PFAS in firefighting foams and exploring further restrictions covering a wide range of industrial and consumer uses. The RMOA "took a grouping approach, to prevent regrettable substitution." According to the update, Defra will share further details in upcoming UK REACH Work Programmes and the UK Chemicals Strategy. It will continue to work with stakeholders as this work develops and build on the constructive dialogue initiated through the PFAS UKCSF Working Group.

HSE has published a rolling action plan (RAP) of substances to be evaluated. The update notes that substance evaluation under UK REACH aims to clarify concerns that the manufacture and/or use of the substances could pose a risk to human health or the environment. In line with its obligations under UK REACH Article 44 and as stated within the 2022-2023 Work Programme, HSE has published a [RAP of substances that will be evaluated](#). HSE has one year from the date of publication of the RAP to evaluate substance(s) added to the RAP that year and, where necessary, to prepare a draft decision requesting further information from the registrants to clarify the identified concern. In 2023 and **2024**, HSE, working with the Environment Agency, will evaluate one

substance, [N-butylbenzenesulphonamide](#). According to the update, as part of this process, HSE has worked with the appropriate authorities to develop and agree on criteria for prioritizing substances for substance evaluation.

©2024 Bergeson & Campbell, P.C.

---

National Law Review, Volumess XIII, Number 229

Source URL: <https://www.natlawreview.com/article/july-2023-meeting-uk-chemicals-stakeholder-forum-includes-update-uk-reach>