Net Zero, Energy and Transport Committee Tuesday 13 May 2025 17th Meeting, 2025 (Session 6)

# UK subordinate legislation: consideration of consent notification

### Introduction

- 1. This paper supports the Committee's consideration of a 'type 1' consent notification sent by the Scottish Government relating to the following proposed UK statutory instrument (SI):
  - Persistent Organic Pollutants (Amendment) (No. 3) Regulations 2025
- 2. The process for how the Scottish Parliament considers consent notifications is set out in the <u>SI Protocol</u>. See **Annexe A** for further details.

### The Persistent Organic Pollutants (Amendment) (No. 3) Regulations 2025

- 3. On 22 April, the Cabinet Secretary for Net Zero and Energy wrote to the Committee to give notice that the Scottish Government proposed to consent to this SI. Her letter is in Annexe B and the formal SI notification is in Annexe C. She explained in her letter that the UK Government would lay the SI on 19 May with a coming into force date of 20 May. The Committee has been asked to respond before 16 May. This does not give the Committee the full 28 days for scrutiny that it should have under the SI Protocol. The Cabinet Secretary's letter indicates that this is due to the urgency of the situation which requires uses of these Persistent Organic Pollutants ("POPs") to continue in the medical technology sector without any disruption to patient care.
- 4. The UK Persistent Organic Pollutants Regulation implements the requirements of the Stockholm Convention on Persistent Organic Pollutants ("the Convention"), to which the UK is a signatory. The Convention requires signatories to eliminate, restrict or limit POPs. POPs are described in the notification as "chemicals that have been internationally recognised as toxic, persistent, bio-accumulative and able to contaminate environments far from their site of release because of their ability to travel long distances in the environment".
- 5. A change to the Convention was notified to the UK Government on 26 February 2024, adding POPs to the list of those to be eliminated. The UK Government then had 12 months to implement these changes. A previous draft set of POPs regulations to implement these was considered by the Committee in June 2024 and subsequently approved at Westminster in December 2024. A further SI was considered by the Committee on 18 February and laid at Westminster on 30 March. The second SI provided exemptions to allow use of these POPs to continue in certain sectors which were not previously known to use these, so had not been provided for in the original regulations.

- 6. The new regulations seek to address a further issue that has come to light since the laying of the previous SIs. The medical technology industry has informed the UK Government that UV-328 and Dechlorane Plus (which were added to the list of POPs to be eliminated in the original regulations) have essential uses in medical applications such as diagnostic machinery and joint replacement prosthesis packaging. Therefore, the UK Government has made a decision to remove the entries for these substances on the list of POPs to be eliminated. This means that their manufacture, placing on the market, and use will no longer be prohibited. The notification states that this is "a timelimited measure whilst the UK Government engages with the medical and other sectors to understand what further exemptions might be necessary". The notification also states that "the UK Government intends to reintroduce the prohibitions at a future date and remains committed to the Stockholm Convention."
- 7. In terms of the Stockholm Convention, the notification explains that the UK has already issued a formal notification of non-acceptance for the listings of Dechlorane Plus and UV-328 due to the provision made in the POPs (Amendment) (No.2) Regulations that the Committee considered in February. The notification explains that this ability to "opt out" is a feature of the Convention "where a signatory identifies that continued use of a POP is needed in their country that is not covered by any of the listed exemptions". This is permitted on the understanding that opt outs are time limited "while supply chains move away from the POP's use or Convention signatories apply to amend the mandated list of exemptions at Convention level". On this basis, the notification states, "the UK will not be breaching its international obligations under the Stockholm Convention with this instrument".
- 8. The key powers being used here to legislate in devolved areas can be used by UK Ministers only if the Scottish Ministers consent. These powers are available to either the UK Ministers or Scottish Ministers (known as "concurrent"). The notification sets out that the Scottish Government proposes to consent as this is "the necessary way to remove the prohibition on the use of Dechlorane Plus and UV-328" and states that "Officials have worked with DEFRA to ensure the drafting delivers for our interests and respects devolved competence in Scotland, and so the Scottish Ministers propose to agree to a GB-wide approach".

### **Next steps**

- 9. If the Committee wishes to approve the proposal to consent to the SI, it may, in doing so, set out in its letter to the Scottish Government any observations or concerns that it thinks are relevant.
- 10. If the Committee is not content with the proposal, it should include in its letter to the Scottish Government one of the following recommendations:
  - That the Scottish Government should not consent to the provision being made in a UK SI and that the Scottish Government should instead take forward an alternative Scottish legislative solution; or

• That the provision should not be made at all (that is, that the Scottish Government should not consent to the provision being included in a UK SI, nor should the Scottish Government take forward an alternative Scottish legislative solution).

Clerks to the Committee May 2025

# Annexe A: Process for parliamentary scrutiny of consent notifications in relation to UK statutory instruments

- The Protocol provides for the Scottish Parliament to scrutinise the Scottish Government's decisions to consent to certain subordinate legislation made by the UK Government: specifically, UK Government subordinate legislation on matters within devolved competence in areas formerly governed by EU law. It sets out a proportionate scrutiny approach and categorises SI notifications as 'type 1' or 'type 2'.
- 2. Type 2 applies where all aspects of the proposed instrument are clearly technical (e.g., they merely update references in legislation that are no longer appropriate following EU exit) or do not involve a policy decision. These are notified retrospectively, after the Scottish Government has given its consent.
- 3. All other proposals are type 1. In this case, the Scottish Parliament's agreement is sought before the Scottish Government gives consent to the UK Government making subordinate legislation in this way. Each type 1 notification must be considered by the relevant Committee.
- 4. The Committee's role in relation to type 1 notifications is to decide whether it agrees with the Scottish Government's proposal to consent to the UK Government making Regulations within devolved competence, in the manner that the UK Government has indicated to the Scottish Government.
- 5. If Members are content for consent to be given, the Committee will write to the Scottish Government accordingly. The Committee may also wish to note any issues in its response or request that it be kept up to date on any relevant developments.
- 6. If the Committee is not content with the proposal, however, it may recommend that the Scottish Government should not give its consent. In that event, the Scottish Ministers have 14 days under the Protocol to respond to the Committee's recommendation. They could—
  - Agree. If so, the Scottish Ministers would then withhold their consent.
  - Not agree. If so, the Parliament will debate the issue.
- 7. If the Parliament agrees to the Committee's recommendation that the Scottish Ministers should not consent, the Protocol provides that the Scottish Ministers should "normally not consent" to the UK SI. However, the Protocol also provides that if the Scottish Ministers consider that the Committee's proposed alternative cannot be achieved, they may consent to the UK SI. If so, they must explain why they are doing so to the Scottish Parliament.

# Annexe B: Correspondence from the Cabinet Secretary for Net Zero and Energy – 22 April 2025

Dear Edward,

#### THE PERSISTENT ORGANIC POLLUTANTS (AMENDMENT) (No. 3) REGULATIONS 2025 - (Defra/ENV/351) EU EXIT LEGISLATION – PROTOCOL WITH SCOTTISH PARLIAMENT

I am writing in relation to the protocol on obtaining the approval of the Scottish Parliament to proposals by the Scottish Ministers to consent to the making of UK secondary legislation affecting devolved areas arising from EU Exit.

That protocol, as agreed between the Scottish Government and then Parliament, accompanied the letter from the then Cabinet Secretary for Government Business and Constitutional Relations, Michael Russell MSP, to the Conveners of the Finance & Constitution and Delegated Powers and Law Reform Committees on 4 November 2020 and replaced the previous protocol that was put in place in 2018.

I attach a Type 1 notification which sets out the details of the SI which the UK Government propose to make and the reasons why I am content that Scottish devolved matters are to be included in this SI. Please note, we are yet to have sight of the final SI and it is not available in the public domain at this stage. We will, in accordance with the protocol, advise you when the final SI is laid and advise you as to whether the final SI is in keeping with the terms of this notification.

The purpose of this instrument is to amend Regulation (EU) 2019/1021 of the European Parliament and of the Council concerning the Persistent Organic Pollutants (POPs) ("the UK POPs Regulation" which is now assimilated law) to remove two POPs, UV-328 and Dechlorane Plus, from Annex I of the Regulation. Two previous UK SIs (ENV/274 and ENV/342) that Scottish Ministers consented to with the Committee's agreement this year, made the additions of UV-328 and Dechlorane Plus to Annex I, among other changes, in accordance with changes to the Stockholm Convention on Persistent Organic Pollutants which were adopted by the Conference of the Parties to the Convention in May 2023. This second SI was laid in the UK Parliament on 30 March 2025 and did not differ from the version on which Scottish Parliament's scrutiny was based.

Unfortunately, since the laying of the previous SIs, the medical technology industry has been in contact with UK Government to inform them that UV-328 and Dechlorane Plus have essential uses in medical applications which if not addressed, could give rise to issues with NHS supply chains and subsequently delay procedures. There are a range of medical products at risk such as diagnostic machinery and joint replacement prosthesis packaging. The uses outlined by the industry are not covered by medical exemptions in previous amendments to the UK POPs Regulation. Therefore, to ensure that patient care is not disrupted, there is a requirement to lay another UK SI to amend the UK POPs Regulation to omit UV-328 and Dechlorane Plus from Annex I to ensure there are no delays to NHS procedures, and to give further time to assess impacts on the sector. This change does not contravene the UK's commitment to the Stockholm Convention and will be in place

while solutions are sought. To ensure that there is minimal to no disruption, the UK Government has set a laying date for this SI as the 19 May 2025 with a coming into force date of 20 May 2025, and therefore consent from Scottish Ministers and agreement from Scottish Parliament is required by 16<sup>th</sup> May. Given the urgency of this situation, Scottish Parliament will have less than 28 days to scrutinise this SI.

I am copying this letter to the Convener of the Delegated Powers and Law Reform Committee.

I look forward to hearing from you before 16 May 2025.

Yours sincerely,

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**GILLIAN MARTIN** 

## Annexe C: Notification to the Scottish Parliament

#### NOTIFICATION TO THE SCOTTISH PARLIAMENT

#### Name of the SI(s)

The Persistent Organic Pollutants (Amendment) (No.3) Regulations 2025

#### Is the notification Type 1 or Type 2

Type 1

#### Brief overview of the SI (including reserved provision)

The Persistent Organic Pollutants (Amendment) (No. 3) Regulations 2025 ("the 2025 (No. 3) Amendment Regulations") will amend Regulation (EU) 2019/1021 of the European Parliament and of the Council concerning Persistent Organic Pollutants (POPs) ("the UK POPs Regulation") to remove the entries for the two POPs UV-328 and Dechlorane Plus.

This SI follows the Persistent Organic Pollutants (Amendment) Regulations 2025 ("the 2025 Amendment Regulations") and Persistent Organic Pollutants (Amendment) (No. 2) Regulations 2025 ("the 2025 Amendment (No. 2) Regulations") which both came into force on 1<sup>st</sup> April 2025. The 2025 Amendment Regulations added three new POPs, including UV-328 and Dechlorane Plus, to the list of substances in Part A of Annex I of the UK POPs Regulation in order to prohibit their use. The 2025 Amendment (No. 2) Regulations added various necessary exemptions in relation to the listing of UV-328 and Dechlorane Plus to allow continued use of the substances in limited circumstances. The 2025 Amendment (No. 3) Regulations will remove the entries for the POPs UV-328 and Dechlorane Plus to allow plus from Annex I of the UK POPs Regulation.

The UK POPs Regulation implements the requirements of the Stockholm Convention on Persistent Organic Pollutants, to which the UK is a signatory. Listing of a POP is mandated at Convention level and means that the POP's manufacture, supply and use must cease unless specific time-limited exemptions, agreed at Convention level, are included for necessary and limited uses. Such exemptions are only included where it is demonstrated that no suitable alternatives yet exist for a use that, if curtailed, would cause serious socio-economic impacts. Exemptions are identified and included in the Convention at the same time that a new POP is listed. Signatories to the Convention must formally notify that they are making use of exemptions. Where a signatory identifies that continued use of a POP is needed in their country that is not covered by any of the listed exemptions, the signatory must notify the Convention that it is opting out of listing that POP. Such "opt outs" are allowed on the understanding that they are time limited while supply chains move away from the POP's use or Convention signatories apply to amend the mandated list of exemptions at Convention level.

The requirements of the Convention in relation to UV-328 and Dechlorane Plus took effect from 26 February 2026. However, in line with Article 22 of the Convention, the

UK issued a notification of non-acceptance (opt out) for the listings for the new POPs UV-328 and Dechlorane Plus in order to be able to include the exemptions that were inserted into the UK POPs Regulation by 2025 Amendment (No. 2) Regulations. This non-acceptance notification from the provisions in the Convention on UV-328 and Dechlorane Plus is still in place. Therefore, removing the prohibition of UV-328 and Dechlorane Plus will not breach international obligations under the Convention.

Although exemptions for Dechlorane Plus and UV-328 were included in the 2025 Amendment (No. 2) Regulations (concerning uses in the aerospace, automotive defence and medical sectors among others), since those amending provisions have come into force, the medical technology industry has highlighted other essential uses of the substances not covered by these exemptions. This impacts NHS boards' ability to perform essential medical procedures in a range of specialisms which, unless addressed, is likely to affect patients in Britain. Therefore, the UK Government has made a decision to remove the entries for the substances UV-328 and Dechlorane Plus from Part A of Annex I of the UK POPs Regulation. The prohibition on these substances will be revoked for a time-limited period to ensure there is no disruption to medical services. The UK Government intends to reintroduce the prohibitions at a future date and remains committed to the Stockholm Convention. Scottish Ministers consented to the 2025 Amendment Regulations and the 2025 Amendment (No. 2) Regulations, with the agreement of Scottish Parliament, in June 2024 and March 2025. The UK Government will make and lay the 2025 Amendment (No. 3) Regulations on 19 May 2025 with a coming into force date of 20 May 2025 under the negative procedure due to the urgency of the need to remove the prohibitions on Dechlorane Plus and UV-328, which will allow the NHS uses to continue.

# Details of the provisions that Scottish Ministers are being asked to consent to.

Regulation (EU) 2019/1021 of the European Parliament and of the Council on Persistent Organic Pollutants ("the EU POPs Regulation") is the mechanism by which the EU and its member states, including the UK while it was a member state, implemented the provisions of the Stockholm Convention on Persistent Organic Pollutants through the elimination and restriction of the manufacture and use of chemicals that have been internationally recognised as toxic, persistent, bio-accumulative and subject to long range transport in the environment. On IP completion day, the EU POPs Regulation was converted into retained EU law and became the UK POPs Regulation. The UK POPS regulation is now assimilated law.

The 2025 Amendment (No. 3) Regulations will remove the entries for UV-328 and Dechlorane Plus from the UK POPs Regulation, which means that the manufacturing, placing on the market and use of those substances is no longer prohibited. This is a time-limited measure whilst the UK Government engages with the medical and other sectors to understand what further exemptions might be necessary for UV-328 and Dechlorane Plus. While exemptions from the prohibition had been included by the 2025 Amendment (No. 2) Regulations, these did not cover the supply and use of those substances in certain articles of medical equipment.

The process of agreeing a new POP at Convention level includes an investigation of what uses may be considered essential and for which no suitable alternative chemicals to the prospective POP are available. At the point that a new POP is added to Annex A of the Convention (which requires signatories to eliminate the POP from use), a list of possible exemptions for the POP is also produced. When updating their Convention-implementing legislation, signatories must notify the Convention of which exemptions they intend to make use of because they are required in their country/region, and by when the POP's use will cease. Although exemptions for a limited number of medical and imaging uses were included through this process for UV-328 and Dechlorane Plus, other essential medical uses not covered by the exemptions that were not identified at the time by global suppliers of medical devices have only come to light recently. This is why this "opt out" for both POPs is now needed. It is not possible to amend or add additional exemptions to the UK POPs Regulation without these being agreed at Convention level, so this opt out is essential for the UK to continue to implement all other aspects of the UK POPs Regulation. UK Government is considering next steps to be able to opt back in for these two POPs.

The UK POPs Regulation has been amended several times, and details have been provided in previous notifications to the Scottish Parliament. More recently, the 2025 Amendment Regulations and the 2025 (No. 2) Amendment Regulations amended the UK POPs Regulation to implement the addition of Dechlorane Plus and UV-328 to Annex A to the Convention, including a range of specific exemptions for their use. The 2025 Regulations and the 2025 (No. 2) Amendment Regulations also made other amendments which are unrelated to the provisions on Dechlorane Plus and UV-328 and which were detailed in the notifications to the Scottish Parliament of those instruments. Those amendments will be unaffected by the 2025 Amendment (No. 3) Regulations.

#### Summary of the proposals

The United Kingdom is a party to the Stockholm Convention. The UK POPs Regulation implements the UK's obligations under the Stockholm Convention in Great Britain. Part A of Annex I to the UK POPs Regulation contains the substances listed in the Stockholm Convention and in the Protocol to it that are subject to elimination, alongside specific exemptions on continuing necessary uses of those substances. The UK POPs Regulation prohibits the manufacturing, placing on the market and use of those substances listed in Part A of Annex I to implement the Convention.

The purpose of this SI is to remove the entries for UV-328 and Dechlorane Plus from the Annex to the POPs Regulations, which will allow their continued time-limited use.

Chemicals policy, including in relation to POPs, engages a complex mixture of reserved and devolved competence. Environmental protection, waste management and public health are devolved while product safety, animal testing as well as health and safety at work are reserved.

#### EU Alignment

In relation to Part A of Annex I, the removal of listings for Dechlorane plus and UV-328 will not impact current EU alignment as the EU has not added these substances to Annex I of Regulation (EU) 2019/1021 (the EU POPs Regulation) yet. However, although not yet confirmed, we expect the EU to prohibit these substances sometime after autumn 2025. If the UK has not "opted back in" before this we would be out of alignment for these two POPs with the EU POPs Regulation. We understand the UK's opt out to be time limited while a solution is sought to this problem that we understand affects global supply chains.

#### Does the SI relate to a common framework or other scheme?

Yes. The UK POPs Regulation forms part of the relevant regulations set out within the scope of the provisional Chemicals and Pesticides Common Framework.

#### Summary of stakeholder engagement/consultation

We have previously written to our stakeholders setting out the general approach we are taking on POPs in Great Britain as a result of legislative changes precipitated by the UK's exit from the EU. For the addition of new POPs to the Stockholm Convention, signatories to the Convention are required to run public consultations in the years that a proposal moves through the Annex I listing process. These consultations include information gathering on potential necessary exemptions for proposed POPs in signatory countries. Further information on UK Government-led consultations in relation to the two POPs this instrument proposes to delete from the UK POPs Regulation can be found in the two previous notifications to the Scottish Parliament for those previous instruments.

Scottish Government understands that NHS Scotland procurement would be affected in the same way as NHS England by the listing of the new POPs UV-328 and Dechlorane Plus. The NHS (across the UK) procures from the same global suppliers and so any issues identified in other parts of the UK will impact Scotland.

#### A note of other impact assessments, (if available)

No Scottish impact assessment has been prepared. The UK Government has indicated that the removal of prohibitions will enable further time to assess impacts to the health sector.

# Summary of reasons for Scottish Ministers' proposing to consent to UK Ministers legislation

The Scottish Ministers consider that consenting to the 2025 Amendment (No. 3) Regulation is the necessary way to remove the prohibition on the use of Dechlorane Plus and UV-328. Officials have worked with DEFRA to ensure the drafting delivers for our interests and respects devolved competence in Scotland, and so the Scottish Ministers propose to agree to a GB-wide approach.

#### Intended laying date (if known) of instruments likely to arise

This instrument is subject to the negative procedure and will be laid at Westminster on 19 May 2025.

#### If the Scottish Parliament does not have 28 days to scrutinise Scottish Ministers' proposal to consent, why not?

The Scottish Parliament does not have 28 days to scrutinise this proposal. Given the ongoing necessary uses of Dechlorane Plus and UV-328 in medical equipment, the UK Government is moving to lay this UK SI as quickly as possible to prevent any delays to NHS procedures, and therefore there is a requirement for the Scottish Parliament to scrutinise the amendments before 16 May 2025.

#### Information about any time dependency associated with the proposal

This instrument is being fast-tracked to minimise the potential for impacts on supply chains in the UK for affected equipment, so that the addition of the two POPs UV-328 and Dechlorane Plus to the UK POPs Regulation that entered into force on 1 April 2025 is reversed from 20 May 2025.

## Are there any broader governance issues in relation to this proposal, and how will these be regulated and monitored post-withdrawal?

None.

#### Any significant financial implications?

None.

Lead Official: **Environmental Quality & Resilience** 

SGLD lawyer:

#### NZET/S6/25/X/X

#### Annex A

**Dechlorane Plus** is used as an additive flame retardant in electrical wire and cable coatings, plastic roofing materials, and as a non-plasticizing flame retardant. In aquatic organisms, Dechlorane Plus affects the developing nervous system and brain.

**Methoxychlor** has been used as an insecticide on crops, vegetables, fruits, and for general nuisance pests such as mosquitos and flies. Methoxychlor is toxic to a range of species (extremely toxic for fish, non-toxic to birds and slightly toxic to bees).

**Perfluorohexane sulfonic acid (PFHxS), its salts and PFHxS-related compounds** is the third (after the previously-listed poly- and perfluoroalkyl substances (PFAS) PFOS and PFOA) most frequently detected PFAS in blood-based samples taken from the general population. Exposure to PFHxS by humans is mainly through the intake of food and drinking water.

**Perfluorooctanoic acid (PFOA), its salts, and PFOA-related compounds**, were used as surfactants and surface treatment agents in textiles, paper and paints, and in firefighting foams. PFOA has been linked to kidney cancer, testicular cancer, thyroid disease, and pregnancy-induced hypertension.

**UV-328** is an additive UV light absorber and is used to protect various materials, mainly polymers, against discoloration and weathering from UV/sunlight. UV-328 has been found to be toxic for mammals, endangering human health and the environment (causing damage to liver and kidney).

#### SI NOTIFICATION: SUMMARY

#### Title of Instrument

The Persistent Organic Pollutants (Amendment) No. 3 Regulations 2025

#### Proposed laying date at Westminster

19 May 2025

#### Date by which Committee has been asked to respond

16 May 2025

#### Power(s) under which SI is to be made

Article 15(1) of Regulation (EU) 2019/1021 of the European Parliament and of the Council on persistent organic pollutants (recast) as amended.

#### Categorisation under SI Protocol

Type 1

#### Purpose

The purpose of this instrument is to amend Regulation (EU) 2019/1021 of the European Parliament and of the Council concerning the Persistent Organic Pollutants (POPs) ("the UK POPs Regulation" which is now assimilated law) to remove the entries to Part A of Annex I for two recently added POPs UV-328 and Dechlorane Plus. Removing these entries is necessary as the medical technology industry has alerted the UK Government to essential medical uses that require the use of UV-328 and Dechlorane Plus in several medical applications including, but not limited to, hip and knee replacement joints. Unless this is addressed, this is likely to affect patients in Britain from the middle of May. The SI will remove prohibitions for the new POPS UV-328 and Dechlorane Plus to allow the UK Government time to discuss the necessity of these substances for various medical uses that are not covered by the current exemptions, and further await the outcome of discussion at the Conference of Parties to the Stockholm Convention.

This instrument follows two earlier amendments in 2025 to the UK POPs Regulation, the Persistent Organic Pollutants (Amendment) Regulations ('The 2025 Amendment Regulations') and the Persistent Organic Pollutants (Amendment) No. 2 Regulations ('The 2025 Amendment (No. 2) Regulations') which amended Annex I, IV and V of the UK POPs Regulation. The 2025 Amendment Regulations added three new POPs, including UV-328 and Dechlorane Plus, to the list of substances as required under Annex A to the Stockholm convention on Persistent Organic Pollutants, amongst other changes. The 2025 Amendment (No. 2) Regulations added various necessary exemptions for the listing of UV-328 and Dechlorane Plus. The Persistent Organic Pollutants (Amendment) (No. 3) Regulations 2025 will remove the entries for the

substances UV-328 and Dechlorane Plus from the table in Annex I of the UK POPs Regulation. The other elements of the 2025 Amendment Regulations are unchanged.

This amendment does not at present cause issues for EU alignment. The EU has yet to amend its equivalent regulations to implement a prohibition on UV-328 and Dechlorane Plus.

#### Other information

Change to the Stockholm Convention on Persistent Organic Pollutants was adopted in Decisions SC-11/10, and SC-11/11 (Listing of Dechlorane Plus and Listing of UV-328, respectively). UK Government received notification from the Convention on the 26 February 2024, and had 12 months to implement these changes. The UK has issued formal notification of non-acceptance for the listings of Dechlorane Plus and UV-328 due to the timing of the implementation of the Amendment (No.2) Regulations and the inclusion of an additional exemption not agreed at Convention level for UV-328 which was included in the Amendment (No. 2) Regulations 2025, therefore, the UK will not be breaching its international obligations under the Stockholm Convention with this instrument.

SG Policy contact:

SGLD lawyer: