

Minutes of the VinylPlus Monitoring Committee Meeting

1st December, 2022 - 14h00 : 15h30
F2F Meeting EU Parliament

Attendees:

Ms Brigitte Dero	Managing Director, VinylPlus
Mr Armand De Wasch	Euro consumers
Prof. Jo Dewulf	University of Ghent
Mr Zdenek Hruska	VinylPlus
Mr Jordi Just	ESPA
Mr Ondrej Knotek	MEP
Ms Justine Kubera	Assistant to Mr Knotek, MEP
Ms Nathalie Lukyova	Assistant to Mr Knotek, MEP
Ms Olga Pozlevic	European Commission, DG GROW
Mr Geoffroy Tillieux	Director, Technical Department, EuPC
Ms Ingrid Verschueren	General Manager, Recovinyl

Excused:

Ms Laure Baillargeon	European Commission, DG GROW
Mr Werner Bosmans	European Commission – DG ENV
Mr Paulo Da Silva Lemos	European Commission – DG ENV
Mr Sylvain Lefebvre	Deputy General Secretary, IndustriAll European Trade Union
Mr Nuno Mello	MEP
Mr Ettore Nanni	President, ESPA
Ana Miguel Pedro Soares	Assistant to Mr. Melo, MEP
Ms Noelle Tracey	Project Manager, VinylPlus

1. Welcome

Jo Dewulf welcomed all the participants

2. Approval of agenda

The agenda was approved by all participants

3. Approval of minutes

The minutes of the meeting held on the April 26, 2022, were formally approved. The question about the development of the Danish EPA, VinylPlus and China Partnership was answered by B. Dero who explained that the partnership stopped at the request of Danish EPA because of the ongoing ECHA work on “PVC and its additives” (Investigative Report).

4. Date and venue of meetings in 2023

Next year the meetings will take place on April 27 and on November 30, from 2pm to 3:30pm. It was agreed to have the next (April) meeting at the European Parliament.

Action: NT to contact Nathalie Lukyova to organise the logistics.

5. VinylPlus Programme implementation

5.1. Recycling

I. Verschueren made an overview of the EU recycling and converting trends, focusing on UK, France, Germany, Spain, Poland, Italy and Benelux. Overall, there is a good supply of recyclates but the demand is slowing down. Government incentives continue to support the Building and Construction sector, including the renovation activities. The biggest threat are extremely high energy costs which will have an important impact on recycling and converting activity.

Year to date about 485 kt of recycled PVC were registered via RecoTrace which collects data both from recyclers and converters. It has to be noted that the majority of converters with recycling activity as well as some recyclers have not yet registered their recycling volumes for 2022. Some countries report lower volumes than forecasted which shows that the demand is gradually slowing down. The recycling volumes in 2022 are expected to stay about at the same level as in 2021 (810,775 kt).

For 2023 it is very difficult to estimate the situation on the recycling market, but the overall economic outlook is bleak. There are many uncertainties linked to the possible recession in the EU zone, high inflation, extremely high energy costs and war in Ukraine. This can have a significant effect on the recycling activities across Europe.

5.2. PVC recycling options

Solving PVC (and plastics in general) circularity challenges will require combination of all recycling technologies currently available or under development. Plastic waste comes in many different waste streams, quantities, and qualities. Z. Hruska described the complementarity of physical (mechanical) and chemical recycling. While the physical (mechanical) recycling is an efficient recycling technology for waste streams that can be easily sorted into single thermoplastic polymer streams, the chemical recycling targets difficult waste streams which are usually sent to incineration or landfilling.

VinylPlus examines all PVC recycling technologies which can further advance the resource efficiency and circular material flow of the products, such as the chemical recycling routes for some specific PVC waste streams which are difficult to recycle by mechanical processes. In the RecoChlor chemical recycling projects, the selected PVC wastes are thermally decomposed in modern waste-to-energy plants which enable to recover chlorine either in the form of sodium chloride (dry process) or as diluted hydrochloric acid (wet process). Both processes lead at the end to the production of new chemical substances which can be sold on the market.

There are still some unsolved issues at the European and Member States levels, namely the Mass Balance aspects and the recognition of chemically recycled substances as recycled content in new products. Recent industry position on this issue can be found [here](#).

5.3. Additive Sustainability Footprint (ASF)

J. Just presented the ASF which is one of the key VinylPlus[®] commitments that focuses on the sustainable use of additives in PVC. The ASF methodology has been developed as a voluntary, European-wide approach to assess and promote the sustainable production and use of additives

intentionally added in PVC products. It is based on the Sustainability Life Cycle Assessment approach developed by The Natural Step (a global NGO) and covers different life cycle stages of the PVC products, from raw material acquisition, additive synthesis, packaging and distribution, compounding and converting, and product use. The sustainable production of additives is now certified via the VinylPlus[®] Supplier Certificate (VSC) for additive producers (and for compounders) that are partners of VinylPlus.

6. Restriction on lead in recycled PVC

Z. Hruska gave details regarding the currently proposed draft regulation on lead and its compounds in PVC. Following the European Parliament's rejection of its initial proposal in February 2020, the European Commission has put forward a more ambitious plan to restrict lead and its compounds in PVC. This new proposal, published on November 17, 2022, on Comitology register, is the result of several years of deliberations and considers the concerns raised by MEPs: transition periods have been shortened; derogation threshold has been lowered; and measures to safeguard human health and the environment have been reinforced. The European Commission proposal presents MEPs with an opportunity to definitively address the issue of lead in PVC in an expedited timeframe. Failure to support the proposal now would further delay the phase out of lead from PVC products and hinder the recycling of secondary raw materials, which is a crucial step towards building a more circular economy. Importantly, were the Parliament to initiate any further delay, this would leave the EU Single Market's door open to continued lead-containing PVC imports from third countries.

As a workable solution that responds to the Parliament's 2020 rejection, the European PVC industry welcomes and supports the proposed regulation. In case of no further opposition from the European Parliament and Member States the new legislation could come into effect by mid-2023.

7. ECHA Investigative Report on PVC

G. Tillieux explained the background of the current work of European Chemical Agency (ECHA) regarding the "Investigative Report on PVC and its Additives" launched by the Commission following publication of the consultancy report "The use of PVC in the context of a non-toxic environment" by Ramboll Germany in 2022.

VinylPlus has provided extensive comments on this report but there were not taken into account. G.T. reiterate that we do NOT agree that Ramboll (2022) report has just gaps – rather it uses out-of-date information and has major flaws and inaccuracies.

In April 2022 the European Commission published the Restriction Roadmap with the Rolling List. In the Rolling List, one entry is "PVC and its additives". VinylPlus questioned the basis for including PVC in the restriction roadmap. Under REACH article 69.1, there should be evidence of specific not adequately controlled risk, proportionality of restriction.

In May 2022 the European Commission commended the ECHA to deliver an "Investigative Report on PVC and its Additives" within 12 months. As a result, the ECHA published already two Calls for Evidence (CfE). The first CfE dealt with a survey on PVC additives used by the industry. The second CfE focused on a reduced number of additives (63 additives), placing emphasis on heat stabilisers, flame retardants, and plasticisers – mostly phthalates. The information required is on the uses, EU volumes per sector and end-use, end-of-life information per use (including the percentage of PVC products at

end of life incinerated, landfilled, reused/refurbished, recycled, and exported as waste), and, where available, experimental/measured release and exposure information of the additives. The third CfE (to be published) shall focus on alternatives to additives (technical, performance, cost, etc.). At the same time, a socio-economic assessment shall be performed by an ECHA consultant, focusing on alternative materials to PVC per application, performance, lifetime availability and cost, recycling rate, and CO₂ emissions.

VinylPlus and the PVC supply chain have shown and are committed to full cooperation in the development of a PVC investigation report.

Overall, however, the assessment of regulatory needs is inconsistent with registration dossier and formal REACH processes. It is based on studies of which reliability has not been assessed. Some additives being documented in detail are put together with others. Also, many additives have already been studied in depth in the past, with no relevant adverse effect being identified.

VinylPlus 's view is that it is important to ensure a robust weight of evidence scientific evaluation of all the relevant data such that balanced and proportionate conclusions can be reached in the assessment. Therefore, sufficient time and resources should be provided for this to be achieved. The formal outcome of REACH and CLP processes should be considered, and it shall not be overridden by other assumptions/consideration. This aspect is a fundamental point for regulatory predictability and industry development in the European market.

8. The VinylPlus Progress Report Timeline

B. Dero reported on the important dates and deadlines for the publication of the VinylPlus Progress Report for 2022. The Monitoring Committee shall receive the report by April 10, to be discussed in the next meeting scheduled by the end of April 2023. The distribution of the Progress Report is foreseen by end May 2023.

The 2023 Vinyl Sustainability Forum will take place in Florence in Italy on May 11. The VinylPlus Monitoring Committee members are cordially invited to join.

9. Wrap-Up

In its conclusion speech Jo Dewulf thanked the participants for active discussion and noted the following points:

- The reference regarding the destination of plastic waste (recycling/landfill/incineration) in terms of figures is needed.
- Legislative clarity regarding the recognition of chemically recycled plastics in recycled content calculations is required to facilitate future investments into the new enabling technologies.
- Regulatory predictability is the key element for industry development in Europe. The current work of ECHA on “PVC and its additives” shall be based on well-structured scientific evaluations based on REACH legislation.
- The next VinylPlus Sustainability Forum will take place on May 11, 2023, in Florence in Italy.

Meeting ended at 16h00