

## EXECUTIVE SUMMARY

# VINYLPUS COMMENTS ON THE ECHA INVESTIGATION REPORT ON PVC AND PVC ADDITIVES

VinylPlus® actively contributed to the ECHA investigation on PVC and PVC additives from May 2022 to November 2023. Throughout the investigation, we provided input into the Calls for Evidence and questionnaires and worked to answer ECHA's additional questions on PVC and its additives. Going forward, **VinylPlus is firmly committed to continue working with regulators to address data gaps and provide relevant data and evidence.**

VinylPlus welcomes ECHA's conclusions that **PVC production is safe**: The ECHA report confirms the adequate and effective control of risks to workers from the production of Ethylene Dichloride (EDC) and Vinyl Chloride Monomer (VCM) and their use to make PVC, as well as the appropriate control of emissions of dioxins and related materials (PCCD/Fs) in relation to the PVC value chain.

After a meticulous study of the ECHA investigation report and its annexes,<sup>1</sup> which leads us to disagree with the regulatory actions suggested in the ECHA report, we would like to share the following **core observations**:

1. **Data gaps need to be addressed and assumptions checked before determining if specific additives pose a risk which is not adequately controlled:** The ECHA report identifies data gaps for some additives which are used to make PVC articles. These are currently being addressed via REACH dossier compliance checks, REACH Substance Evaluations and other regulatory processes. The approach taken for the ECHA report is to assume that certain hazard concerns have already been confirmed. In our view, any consideration of further regulatory action must await the outcome of these ongoing processes.
2. **The chosen prioritisation for additives does not respect formal regulatory processes:** the approach does not properly distinguish between substances that have already been formally assessed under REACH and CLP and those that have not. Rather assumptions are made regarding hazard, ED and PBT/vPvB properties for many substances. For some substances, this is in contradiction to existing formal regulatory assessments, and for others, formal regulatory processes (e.g. REACH compliance checks) are currently ongoing. It is important that formal regulatory outcomes are respected, and that further work is allowed to be completed before reaching conclusions on hazards and risks and the need for regulatory action.
3. **Microplastics require a broader approach than just PVC:** Although not reflected in any of the calls for evidence related to this report, the ECHA report highlights concerns regarding PVC microplastics and their potential for persistence and for release of additives from microplastics with the associated potential for health and environmental effects. PVC microparticles are estimated to represent only 3% of microplastics<sup>2</sup>, which in turn represent only 0.09% of total particulates. In view of risk management measures, which are already proposed by the European Commission and co-

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<sup>1</sup> [ECHA \(2023\), Investigation report on PVC and PVC additives](#)

<sup>2</sup> [UNEP \(2018\), Mapping of Global Plastics Value Chain and Plastics Losses to the Environment: With a Particular Focus on Marine Environment](#)

legislators<sup>3</sup> we are committed to contributing to this already ongoing work covering the entire plastics value chain with relevant data, information and action.

4. **Several technical errors which impact the conclusions should be corrected**, for example:
  - a. Attributing edge bands (used in furniture) to windows and hence extrapolating the volume of installed tin stabiliser used in Europe to all currently recycled volumes of rigid PVC. The presence of tin stabilisers in microparticles is hence also overestimated by several orders of magnitude.
  - b. Recycling figures – citing Conversio data (2021), the ECHA report gives 12% recycling of post-consumer PVC waste; the correct Conversio figure is 24%.
  - c. Recycling figures – flooring: the figure for flooring recycling for 2022 is 141,000 tonnes pre-consumer and 4,000 tonnes post-consumer, which is much higher compared to the volumes presented in the report (figure 8).

Further errors are laid out in the detailed comments.

5. **The assessment of PVC versus alternative materials is flawed:** As an example, ECHA concludes that the substitution of PVC with alternative materials in cables would be less costly than in other uses. However, the additives used in cables today, such as high molecular weight plasticisers and calcium/zinc stabilisers, have been assessed to be a low hazard (non-CLP classified/not SVHCs) and safe for use in current applications such as cables. Moreover, alternative materials are not being assessed to the same degree as PVC and its additives with respect to health, safety, and sustainability, nor with respect to socio-economic and performance impacts. VinylPlus is ready to work with regulators on a robust LCA-based methodology to compare different materials in an equitable manner.

Based on these core observations, VinylPlus believes that **further data can be developed to support risk assessments:**

1. Through updates of the REACH dossier related to the 63 prioritised additives (principally hazard and exposure data).
2. By researching PVC microplastics: generation, particle sizes, environmental fate, migration of additives, toxicity, ecotoxicity, exposure during recycling and landfilling.
3. By looking into dust exposure during recycling.
4. By conducting a mass balance investigation of various baseline scenarios for different materials by application.

VinylPlus notes that the ECHA Investigation Report<sup>4</sup> summarises key uncertainties, assumptions and data gaps in a list of 21 items, including some of the above. VinylPlus would welcome the opportunity to review the priorities and discuss how to address data gaps. VinylPlus' core observations are further explored in the **VinylPlus response to the ECHA report**. This response comprises:

- **Detailed comments** on the main sections of the ECHA report.
- **Annex 1** – List of assumptions which are being made in the ECHA report resulting in recommendations for regulatory action.
- **Annex 2** – Summary of areas where further data can be developed to support risk assessments.

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<sup>3</sup> [Proposal for a Regulation on preventing pellet losses to reduce microplastic pollution](#)

<sup>4</sup> [ECHA \(2023\), Investigation report on PVC and PVC additives](#), Section B.8., Table 97 on page 143