

Ms Kerstin Jorna

Director-General for Internal Market, Industry, Entrepreneurship and SMEs
European Commission
45 Avenue d'Auderghem
1040 Brussels

Brussels, 14 October, 2021

Dear Director-General Jorna,

On behalf of VinylPlus^{®1}, I am writing to bring to your personal attention the serious concerns of the PVC value chain regarding the impact of the draft Commission Regulation restricting the content of lead in PVC and to request a meeting to seek a workable solution for the continued recycling of PVC in line with the Circular Plastics Alliance (CPA) targets. In particular, I refer to the ongoing restriction proposal in the Restriction Roadmap shared with CARACAL on 29 June² which states that the scope of the draft restriction “could be extended to cover other substances used in PVC in addition to PVC as such”. Such signals undermine our recycling efforts and achievements over the last 20 years and our further ambitions for 2030.

On 27 September, the CPA announced its new commitments on plastics’ recyclability, including for several PVC construction products. Commissioner Breton [welcomed](#) these efforts and the fact that “the plastics value chain is showing great cooperation towards the transition to circular plastics”. Launching a restriction on PVC in general would not only contradict such commitments but would be discriminatory, singling PVC out from other polymers or materials, and would create uncertainties across many sectors, in particular the “Construction Ecosystem”. As stated in the Commission’s New Industry Strategy, “The transition to a greener European economy in no small part depends on the performance of the **construction ecosystem** and its ability to renovate Europe’s existing building stock, accounting for approximately 40% of EU energy consumption and emissions”.

PVC mechanical recycling reached 731,461 tonnes (25% of the total generated waste) in 2020 and VinylPlus is a signatory and active participant in the CPA, aiming to deliver 900,000 of the 10 million tonnes of recycled plastics in new products target of the CPA by 2025, and to reach 1 million tonnes by 2030. A restriction on PVC as such – or even consideration of such a restriction, would unfairly benefit other materials, diverting European investments away from a polymer proven to be safe to recycle and to be an asset to improve the sustainability performance of various sectors. The socio-economic impact of such a restriction should not be under-estimated as PVC is a versatile material used in a wide range of value chains, from automobile to medical devices to energy-efficient buildings.

Without a sufficient derogation for flexible and rigid articles, PVC will not be able to be recycled as lead stabilizers were used in PVC production until 2015 while PVC products such as window frames and water pipes are only recycled after several decades of use. For flexible PVC for instance, more than 150kt of recyclates from the recycling of PVC cables, which are safely recycled today, would be lost from the circular economy as these volumes would have to be either incinerated or landfilled.

According to the science presented by ECHA³, when compared to landfill and incineration, the recycling of PVC containing lead is the most effective risk management option, both from environmental and human health

¹ VinylPlus[®] is the PVC value chain’s voluntary sustainability programme and has thrived since its inception in 2000 with the support and guidance of the Commission and the commitment of the PVC manufacturers, converters, suppliers and recyclers. Today we recycle 739,525 tonnes of PVC, a volume we have committed under the CPA to increase to a minimum of 900,000 tonnes of PVC per year into new products by 2025, and a minimum of 1 million tonnes per year by 2030.

² Doc.CA/34/2021

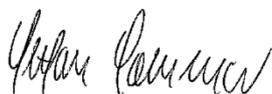
³ <https://echa.europa.eu/documents/10162/86b00b9e-2852-d8d4-5fd7-be1e747ad7fa>

point of views. VinylPlus has been committed to finding a balanced solution and has continuously provided the Commission with all the data, insights and support needed to reach an evidence-based compromise in line with the Commission's Circular Economy ambitions. We are now concerned that a future Commission proposal could go against Circular Economy principles and scientific evidence and discriminate against PVC as a sustainable material.

I urge for a solution that: (a) is consistent with the science and based on evidence; (b) enables PVC to reach its full potential in contributing to the circular economy; c) prevents valuable and recyclable material from being incinerated or landfilled; (d) enables existing recyclers to continue to operate; and (e) is non-discriminatory.

I would welcome an in-person meeting or a teleconference with you to further discuss this restriction proposal which is critical for our industry and will contact you in the coming days to see if this can be arranged.

Yours sincerely,



Stefan Sommer

Chairman of VinylPlus
Chairman of the Supervisory Board of Vynova Holding

C.C:

Kristin Schreiber, Director, GROW.F,
Gwenole Cozigou, Director, GROW.H,
Giuseppe Casella, Head of Unit, GROW.F.1,
Fulvia Raffaelli, Head of Unit, GROW.H.1,
Stefano Soro, Head of Unit, GROW.I.3,
Patrizia Tosetti, Policy Officer, GROW.F.1,
Laure Baillargeon, Policy Officer, GROW.I.3,
Virginia Janssens, Managing Director Plasticseurope,
Brigitte Dero, Managing Director VinylPlus,