BACKSTAGE PASS

November 2019

The European Council of Vinyl Manufacturer's newsletter, for industry only

ECVM

Restriction of Hazardous Substances in E&E Equipment (RoHS) Methodology Finalised and Preliminary Implementation

Following the April 2019 stakeholder meeting reported in the previous issue, a revised final version of the methodology was published end of September. Although some aspects were improved, a few key concerns remain, especially the fact that PVC is mentioned as a "dioxin precursor", that substances used during production but no longer present might be considered for assessment, at least in the first steps, and that "uncontrolled treatment in third countries" is still a reason to consider a restriction, a provision which has been exploited in the past to target PVC. In parallel, the German consultant Öko Institut, which is in charge of developing the methodology, applied it to carry out a preliminary substance inventory.

The EU Commission launched in September 2019 three consultations on RoHS:
1. Reports on the shortlisted substances (to be addressed by each sector separately) – closing on 7 November for the reports of chemical elements (other reports to be released by end of October, extended deadlines).
2. Substance Inventory – closing on 7 November.
3. RoHS 2021 Review – closing on 6 December. The objective is "to gather views on how the restriction of hazardous substances in electronic products works in practice". View the online version here.

ECVM is working together with PlasticsEurope on consultation 3. A draft reply has been circulated to experts and will be discussed on 29 October. Regarding consultation 2, the preliminary assessment put PVC in priority group IX, together with iron, aluminium and alumina. This is a much lower priority than the 2014 Öko Institut classification, which recommended assessing PVC as a first priority because of alleged "risks associated with its disposal and incineration under uncontrolled conditions."

This new inventory places however several phthalates in priority group I for assessment, including DINP and DIDP. Medium chain chlorinated paraffins are in Group III, and diantimony trioxide is in priority group V.

Recycling Issue for PVC Windows Under RoHS Going in the Right Direction

Windows are increasingly sold with electrical actuators and/or motors bringing them into the scope of RoHS, and hence subject to its 0.1 % restriction on lead. As profile manufacturers do not necessarily know for which kind of windows their products will be used, they have to abide by this restriction for all products, which would be a major problem for PVC recycling. As early as December 2015 , the EuroWindoor association, in cooperation with EPPA, applied for a RoHS exemption for lead in post-consumer PVC-U profiles. After several reminders, the European Commission published end of September 2019

a draft Delegated Directive proposing an exemption for windows containing recovered PVC with a lead content of up to 2 %. The proposed validity is however only 2 years. Industry replied to the public consultation, stating that the proposed concentration levels are acceptable, but that the validity is far too short, not being in line with the derogation to the lead restriction proposed under REACH. The latter has a proposed length of 15 years. Further developments will remain pending until the lead restriction under REACH is finalised.

Latest Developments in Waste Gas From Chemicals (WGC) BREF

As reported in the previous issue, the June data validation workshop concluded that the data provided in Q4 of 2018 needed cleaning up. The Technical Working Group agreed to allow data correction until end of September, but industry partners were asked to provide corrections to Member State authorities by end of July. Several ECVM member companies participated in this updating exercise. As also reported previously, diffuse emissions were extensively discussed during the workshop because of their increasing relative importance in overall emissions and authorities' concerns about proper measurement and mitigation. An industry position on this topic has been prepared by Cefic after extensive internal consultations.

According to information provided by the EU Commission mid-October, Draft 1 of the WGC is foreseen for end of November 2019, a data/BAT workshop is expected in Q2 of 2020, and the final TWG Meeting could take place in Q4 of 2020.

Basel Convention and OECD guidelines

As reported in the previous issue, the 'Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal' was amended in May 2019. As a result, most plastic waste has been placed in the category "waste requiring special consideration". The movement of such type of waste between countries is subject to restrictions, the key one being a stringent notice and consent approval process.

The OECD harmonises its provisions with the Basel Convention with respect to transboundary waste movement between OECD countries, in particular with regard to the classification of wastes subject to control. Amendments to the Basel Convention are normally incorporated into the "OECD Decision on the Control of Transboundary Movements of Wastes Destined for Recovery Operations" and become automatically effective. In July, the US raised an objection to incorporating the plastic waste amendments and recommended an alternative proposal, i.e. that all plastic waste should be green-listed within the OECD, and calling also specifically for PVC waste to remain green-listed (no prior consent from authorities required). The EU appears reluctant to support the US position because of concerns about waste management practices in some non-EU OECD countries. The plastic industry is currently assembling information about such practices, hoping to alleviate such concerns. The OECD Working Party in charge is expected to take a decision end of November. The decision would take effect as from 1 January 2021. ECVM has asked the Global Vinyl Council (GVC) to help with the gathering of evidence about plastic/PVC waste management in OECD countries.

Consultation on the future of the Construction Products Regulation (CPR)

A public consultation in Q1 of 2018 showed support for a limited revision addressing a few identified issues, but definitely against a repeal. The Commission however concluded that several of these issues would require more than an incremental approach, and announced a new consultation with better defined options. The Commission hired a consultant to carry out a survey as preliminary input for the development of a public consultation to take place in the coming months. The survey was launched among a limited group of stakeholders, among which Construction Products Europe (CPE), which in turn consulted its membership. After consultation of the B&C Workgroup of PlasticsEurope, a set of proposed

replies was sent to CPE on 22 October. Our replies to CPE confirmed support for the current scope, objectives and general approach of the CPR.

ECHA Waste Framework Directive database

Background information
In July 2018, ECHA announced it would establish a new publicly available database on the presence of hazardous chemicals in articles by the end of 2019 for waste treatment operators and consumers. The task is based on the revised Waste Framework Directive that entered into force in July 2018. It would comprise information submitted by companies producing, importing or selling articles that contain Candidate List substances, in quantities of more than 0.1 % of their weight. Companies who supply such articles will need to submit company data, Candidate List substance data, the article description and safe use instructions of the article to ECHA by the end of 2020. This information requirement is not new. Under REACH, companies have to communicate information on articles containing Candidate List substances down the supply chain.

The database has three main objectives:
- Decrease the generation of waste containing hazardous substances by supporting the substitution of substances of concern in articles placed on the EU market.
- Make information available to further improve waste treatment operations.
- Allow authorities to monitor the use of substances of concern in articles and initiate appropriate actions over the whole lifecycle of articles, including at their waste stage.

On 10 September 2019, ECHA released more information on the database which is called SCIP database - Substances of Concern In articles, as such or in complex objects (Products). Responding to industry concerns raised during the public consultation, ECHA will ensure the protection of confidential business information where justified, e.g. links between actors in the same supply chain will not be publicly available. Suppliers of articles need to provide: information that allows the article to be identified; the name, concentration range and location of the SVHC in the article; and possibly other information on the safe use of the article. Further information can be provided on a voluntary basis.

Next steps:
- 5 January 2020: Deadline for ECHA to set up the hazardous substances database.
- July 2020: Deadline for Member States to transpose the legal requirements into national law.
- 5 January 2021: Deadline for companies to submit this information for articles placed on the market.

Interface between Chemicals, Product and Waste legislation (CPW)

In January 2018, the Commission published a Communication and accompanying staff working document on options to address the interface between chemical, product and waste legislation. It explores four critical issues identified in the way chemical, product and waste legislation work together: insufficient information about substances of concern in products and waste; presence of substances of concern in recycled materials; uncertainties about how materials can cease to be waste; and difficulties in the application of EU waste classification methodologies, which can impact on the recyclability of materials.

In September 2018, the European Parliament voted in favour of a Motion for a resolution and took the view that recycling should not justify the perpetuation of the use of hazardous legacy substances.
The Commission launched a public consultation on the options identified that ended on 29 October 2018, the results were published on 4 March. The 461 responses confirmed agreement on the relevance of the issues identified and support for future policy development. The Commission has launched three studies which will deliver further information in Q4 2019 and early 2020. The next step is for the new Commission to publish legislation.

Product Policy Framework

On 4 March, the Commission published a Staff Working Document which examines options and actions for a more coherent policy framework of the different strands of work of EU product policy in their contribution to the circular economy. Thereby, the Commission singles out eight priority product categories, most notably: textile and furniture, buildings and construction products, and chemical products. For construction, better recycling of doors, flat glass and window frames containing PVC are mentioned.

The Commission just launched a feasibility study on traceability of substances of concern and the use of different information systems. The study would also look at innovative tracing technologies and strategies which could enable relevant information to flow along article supply chain and reach recyclers. The study would conclude during the first half of 2020.

Next step:

- Q1 2020: Commission to publish a new Circular Economy Action plan reconciliating climate change and circular economy

VinylPlus®

Plastics Strategy & Circular Plastics Alliance

In December 2018, the Commission announced the launch of a new cross-industry platform Circular Plastics Alliance (CPA) aimed at facilitating the value chain cooperation. It is meant to be complementary and supporting the pledging exercise. VinylPlus has been selected as member among 30 stakeholders. The CPA agreed to work on 5 priority topics and working groups: collection and sorting of plastic waste, product design for recycling, recycled plastic content in products, R&D and investments, and monitoring of recycled plastics sold in the EU. Since the first CPA meeting in February, several working group meetings took place.

On 4 March, the Commission published an assessment report of the voluntary pledges. It concludes that there is a strong momentum within the plastics value chains in favour of more recycled plastics. The pledges from suppliers of recycled plastics, if fully delivered, are sufficient to reach the 10 million tonnes target. However, there is a mismatch between the pledges from the supply and the demand sides. VinylPlus is mentioned as a platform representing the full supply chain which reports tonnages of recycled plastic materials that are pledged to be used by the value chain to make new products by 2025.

The CPA adopted a Declaration at its high-level event on 20 September. All companies, trade associations and public authorities willing to share the vision and actively contribute to the work of the Alliance were able to sign the declaration. VinylPlus is among the over 100 signatories from about 40 from trade associations, about 60 companies and some public authorities such as Portugal. The signatories will work together to achieve the goals of the CPA.

Next steps:

- 1 March 2020: Deadline for guidelines on recycling for all plastics products and standards; and deadline to build an R&D agenda on circular plastics.
- 1 June 2020: Deadline to deliver a state-of-play on collection and sorting of plastics waste in the EU
- 1 January 2021: Deadline to produce an overview of EU-wide definitions of recyclability per product group

Stefan Sommer, Chairman of VinylPlus, signing the Circular Plastics Alliance on the 20th September 2019.

Dynamic Waste Model Presented to VinylPlus

It is very important for VinylPlus to be able to compare the recycling volumes it reports with the amounts of PVC waste arising and available for collection. These amounts are also essential information for advocacy discussions. Since 2000 Vinyl 2010 and VinylPlus relied on one-off estimations based on historical sales of PVC products and average service life of such products. Such estimations were very useful, but were quickly obsolete and were based on largely undocumented input data. In December 2018 VinylPlus commissioned consultant Conversio to develop a dynamic model providing on-going estimations.

The principles of the model and some preliminary results were presented on 27 September to representatives from the Controlled Loop Committee and from several converters' product groups. The model provides an estimation of the amount of the post-consumer PVC waste expected to arise, to become available, and to be recycled, in the period 2020-2030, in 20 predefined PVC product categories, aggregated into 7 major application fields, both at national and at EU level. It relies like previous estimations on historic product sales and service life, but also on data on 10 major waste streams where PVC waste is present. A key feature of this model is the fact that some key parameters can now be modified by industry users (e.g. service life, collection rates, use of recyclate in new products), which allows to run scenarios as well as adjust to changing conditions. A final result of a base case scenario is expected before end 2019. A software tool with user-friendly interfaces will be developed during the first quarter of 2020.

VinylPlus® Introduces Material Circularity to a Youth Sports Event

Following the successful partnership with the International School Sport Federation (ISF) for the event She Runs – Active Girls' Lead 2019 in Paris earlier this year, VinylPlus and ISF just released their follow-up report on reducing the environmental impact of sporting events.

The report was written as part of the co-signed 'Environmental Action', a commitment to ensure PVC was used sustainably in the run-up to, during and after the She Runs event. The report and its conclusions will serve as the basis to support future collaborations between VinylPlus and the ISF.

Brigitte Dero, VinylPlus General Manager, and Laurent Petrynka, ISF President, signed the report at the Active Girls' Lead Conference on Friday 27 September in Brussels in front of members of the European institutions, international and European sport organisations, experts on gender equality in sport, and international athletes.

Click here to see the report.

Laurent Petrynka, ISF President, and Brigitte Dero, VinylPlus General Manager, signing the joint VinylPlus - ISF report.

The VinylPlus stand was interactive, providing the girls with PVC goodies and props for photos, as well as bouncing balls for racing on PVC flooring.

VinylPlus® Stands up for Sustainability at the European Week of Sport

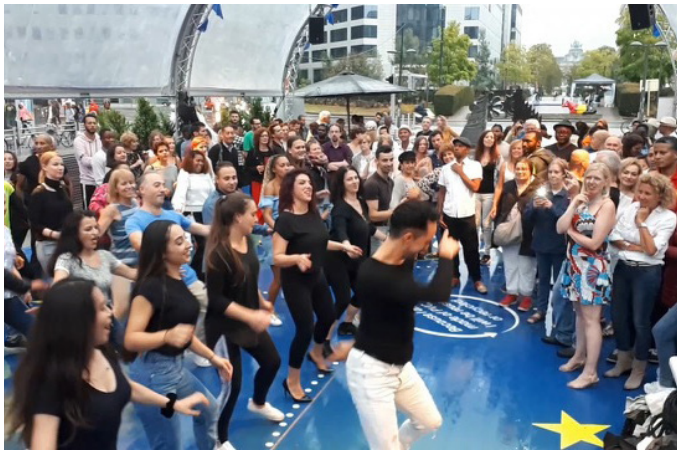
VinylPlus continues to engage with the sport community. Its latest partnership, with citizenship association Schuman Square, was for the 5th edition of the European Week of Sport. The Week, organised by the European Commission, is the largest public-funded sports initiative worldwide, with events taking place all over Europe from 23 to 30 September each year. It was an important opportunity to highlight the essential role PVC plays in sports for the wider public as well as key stakeholders. VinylPlus spent the week championing the sustainable use of PVC in sports, its re-use and recyclability.

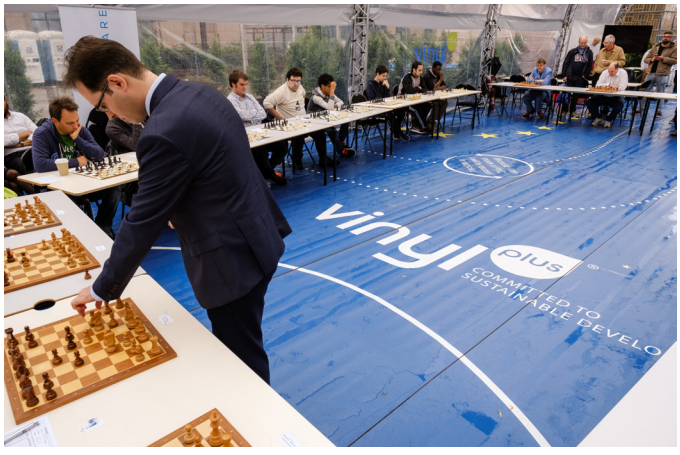
Through the collaboration with Schuman Square, VinylPlus laid high performance PVC flooring, provided by VinylPlus partner Gerflor, to cover the 225m2 area beside the Schuman roundabout in Brussels, right between the European Commission and European Council. Branded with the VinylPlus logo and key messages, it made a big impact. The flooring, which contains 32% recycled PVC, is the same used for competition-level basketball, badminton and volleyball courts. Its reuse was guaranteed by Schuman Square from the beginning of the partnership.

Different sporting activities took place at the Schuman roundabout, including yoga, martial arts, dancing and chess. For the yoga sessions, VinylPlus provided high-quality PVC yoga mats, sourced from partner A. Kocklmann. The yoga mats will be donated to hospitals in the local area to help with rehabilitation programme.

Click here to find out more

For the yoga day, VinylPlus provided PVC yoga mats that will be reused in local hospitals.





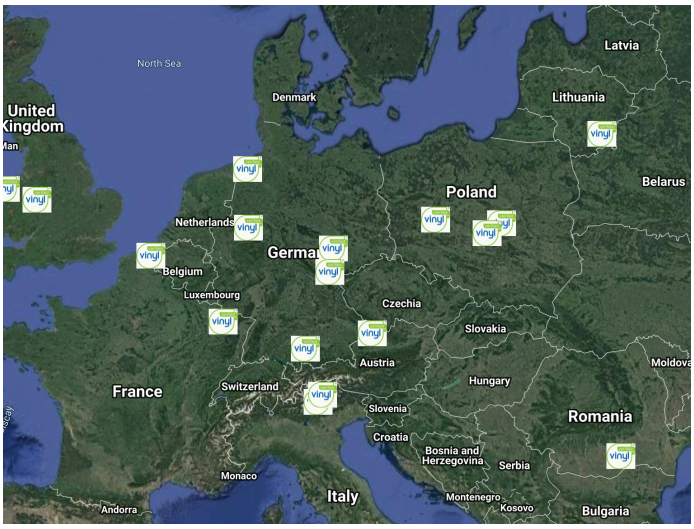
The VinylPlus® Product Label Goes Eastwards !

With the certification of 5 new PVC profile systems manufactured in 2 new European countries (Lithuania and Romania), the VinylPlus sustainability standard move eastwards. This is an important positive evolution as this entices the Eastern PVC manufacturers to comply with the ECVM Charters and financially contribute to VinylPlus.

The first two flexible products (tunnel membrane, decoration film for LVT) have been audited in Italy; additional evidences for a certification will be gathered for Q1 2020. The first coated textile products will be audited in Germany on early December. European leading pipe, flooring, and roofing membrane manufacturers are currently studying in depth the scheme requirements before an application.

ECVM members are invited to actively promote the VinylPlus® Product Label during visits at accounts being not yet certified. Most of the label holders needing to be recertified after 2 years, have already contacted auditors for running new audits. This proves that these converters have seen a true added value in the certification.

For more information and an inventory of the certified products, click here or contact Vincent Stone.



Product Label holders are from all over Europe.

VinylPlus Sustainability Forum 2020: Save the Date!

PVC4Pipes

Successful First Edition for the PVC4Pipes Event

The very first edition of the PVC4Pipes event took place in Bologna on the 17th September. Co-organized with PVC Forum Italia, the conference attracted more than 95 participants from 13 countries, including representatives from the whole supply chain: utilities, pipe manufacturers, compounders, equipment manufacturers, raw material suppliers and certification bodies. Innovative technical performance and sustainable solutions in the European PVC pipes sector were showcased, taking the theme 'PVC Pipes in Europe: Delivering sustainable performance for more than 80 years' .

In a review of the Circular Economy Network Project exploring the use of recycled plastics in network services, Emilio Caporossi from Gruppo Hera announced the launch of the installation of about 800m of multi-layer/structured wall PVC sewer pipes including recycled material in Vedrana. He also mentioned that break rates in Hera's water networks amounted to 0.07 break/km/year for the PVC pipes vs. 0.52 for the PE pipes. Bruce Hollands, from the Uni-Bell PVC Pipe Association, shared findings from studies evaluating the cost and sustainability of underground piping that can help municipalities to drive their investment decisions. Demonstrating that PVC pipes are frontrunners in circularity, Roger Loop from BureauLeiding outlined how the first operational plastic waste collection scheme in the Netherlands is recycling PVC pipe waste for reuse in three-layer sewage pipes. In a last session showcasing PVC pipes innovations, Gianpaolo Contarini from IPM introduced for the very first time a game-changing sealing technology allowing to dramatically reduce the intrusion of plant roots in PVC sewer pipes.

More info here.

Mario Romersi, Moderator, taking questions for Roger Loop, Director at Bureau Leiding.

PVC4Cables

PVC4Cables Conference a Success

The 2nd PVC4Cables Conference, Innovation and Sustainability for Smart Electrical Systems, took place in Berlin on 7 November 2019. The conference agenda covered market trends, standardisation, fire and smoke behaviour, the new LCA and TCO (Total Cost of Ownership) studies. Particular attention was paid to innovation in additives and to PVC cables performance improvement. Over 90 representatives of the European PVC cable industry debated the future of the sector, focusing in particular on research and development (R&D), sustainable development and market trends.

"At the global level, PVC remains the most used material," confirmed Astrid Aupetit, Senior Research Analyst of AMI Consulting, "with 53% of the processed compounds' volumes, and an estimated growth of 1- 1.5% in the coming years. In Europe, PVC maintains its leadership among the materials used in the low- voltage cable industry."

PVC is an excellent choice thanks to the versatility of its formulations; the easy processing; its excellent insulation properties; its performance in terms of resistance to fire and atmospheric agents, and its cost- efficiency. Although PVC is considered a mature material by many, the research and innovations in formulations developed in recent years has led to very promising results. Recycling is, of course, one of PVC's strong points.

Speaking on challenges and opportunities in making PVC cables circular, Ingrid Verschueren, General Manager of Recovinyl®, highlighted "the excellent performance achieved in 2018 in PVC cables recycling, with 151,506 tonnes recycled and a 20.3% increase over 2017." Since 2000, more than 1.1 million tonnes of PVC cables have been recycled in the framework of VinylPlus®, saving nearly 2.3 million of CO2 emissions.

PVCMed Alliance

Growing Interest in Circular Economy

Although the circular economy has now been on the agenda for many years, recycling of medical devices has often been considered a no-go due to fear of contamination. Yet as readers of the Backstage Pass might be aware, the practice is well-established with over 200 hospitals in Australia, New Zealand and the UK collecting used PVC medical devices from pre-screened patients. By recycling used devices instead of sending the waste to costly treatment, hospitals save money and contribute to the circular economy. The good news has spread to other countries, and more and more hospitals are expressing interest in setting up recycling projects. In April, PVCMed visited Edinburgh Royal Infirmary to discuss the challenges and opportunities with very enthusiastic nurses and waste managers. In June, PVCMed met with an environmental manager at Haukeland University Hospital in Bergen, Norway, who is very influential in the Nordic region and can help expand PVC recycling to hospitals all over the Nordics. At the VinylPlus Sustainability Forum, two video interviews were recorded on medical recycling initiatives in both Australia and South Africa.

PVCMed Comments New Nordic Swan Ecolabelling Criteria

In February, the Nordic Swan Ecolabelling announced a public consultation for new criteria for disposable medical devices. As the preliminary criteria were heavily biased against PVC, PVCMed wrote a detailed comment letter with input from technical experts, listing six reasons why the Nordic Swan Ecolabelling should revise its PVC policy. The document can be downloaded here. A crucial flaw in the document was the statement that a PVC-free blood bag is very close to market and can therefore obtain the Nordic Swan label. In fact, the EU-funded PVCFreeBloodBag Project did not succeeded in developing a PVC-free blood bag that can meet the many requirements such as storage time. A communication campaign on social media is ongoing – centered on WHO's World Blood Donation Day on 14 June – to make more known the fact that PVC remains the only acceptable material for blood bags.

PVCMed Sponsored the NHS Parliamentary Awards

In July, the UK parliament hosted an event to recognise the work done by NHS staff, volunteers and others working in the healthcare sector, towards the recycling of medical devices. PVCMed participated as a partner at the awards ceremony, with an online article on PoliticsHome.com, and had the logo displayed on all material related to the event. The event was a unique opportunity to build relationships with MPs and key stakeholders in the British healthcare system and show the achievements of RecoMed and the advantages of PVC in healthcare. PVCMed focussed on the central role nurses play in establishing circular economy in healthcare.

Follow us on Twitter and LinkedIn for updates.

CONTACTS

Brigitte Dero General Manager, ECVM/VinylPlus
brigitte.dero@plasticseurope.org

Sylvie Famelart Senior Communications Manager, ECVM/VinylPlus
sylvie.famelart@plasticseurope.org

Zdenek Hruska Public Affairs Director, ECVM/VinylPlus
zdenek.hruska@plasticseurope.org

Arjen Sevenster Technical and Environmental Affairs Senior Manager, ECVM/VinylPlus
arjen.sevenster@plasticseurope.org

Vincent Stone Technical and Environmental Affairs Senior Manager, ECVM/VinylPlus
vincent.stone@plasticseurope.org

Noelle Tracey Event Manager, ECVM/VinylPlus
noelle.tracey@plasticseurope.org

Gaetane Bellefroid Senior Assistant, ECVM/VinylPlus
gaetane.bellefroid@plasticseurope.org

Mhairi Law Communications Manager, ECVM/VinylPlus
mhairi.law@plasticseurope.org

Ole Grøndahl Hansen PVC Information Council Denmark
ogh@plast.dk