BACKSTAGE PASS

MARCH 2021 | The European Council of Vinyl Manufacturers' newsletter, for industry only

ECVM

REVISION OF THE INDUSTRIAL EMISSIONS DIRECTIVE (IED)

The European Commission is committed to reviewing the legal framework of Directive 2010/75/EU on Industrial Emissions (IED) under the European Green Deal. In parallel, the Industrial Strategy for Europe highlights the need for new processes and technologies, innovation, and investment to facilitate industry's shift to a climate neutral, clean and circular economy. The review aims to support the European Green Deal goals on zero pollution, climate neutrality, biodiversity, and a cleaner, more circular economy.

A public consultation was open between 22 December 2020 and 22 March 2021. In parallel, a detailed Targeted Stakeholder Survey for IED experts and stakeholders was launched on 8 February 2021 and will remain open until 2 April. The European Commission has also launched an impact assessment of the closely-related E-PRTR (European Pollutant Release and Transfer Register).

Cefic, the European Chemical Industry Council, is preparing replies with the help of industry representatives, including two from ECVM. Main industry concerns are on the alignment objective between IED and REACH, particularly for SVHCs*, which could potentially lead to the move away from a risk management concept and towards a strict 'precautionary' principle, as well as the potential addition in the IED of obligations regarding energy use, CO_2 emissions and depletion of natural resources. A key argument to support the objection of this direction is the likelihood for duplication with the EU Trading Scheme (ETS) for CO_2.

** Substances of Very High Concern*

WASTE GAS FROM CHEMICALS PLANTS (WGC) BREF – UPDATE

Site visits, initially planned in March 2020, took place on 19 – 23 October 2020, including the Rheinberg PVC plant visit on 22 October. The (virtual) visit was well prepared by the INOVYN team and proceeded smoothly. The discussions were mainly devoted to VCM and dust emissions from driers, particularly on the obstacles to measurement and abatement in view of the large air flows. EU Commission representatives appeared open to industry's views that Associated Emission Levels (AEL) expressed in concentrations are duplicating, and much less meaningful, than levels expressed in pollutants' loads (g/tonne PVC produced).

A data workshop took place on 1 and 2 December 2020 and was followed by extensive discussions on confidential business (CBI) data, which are requested by the Technical Working Group (TWG). Closed workshops between Member States, the EU Commission, and a few representatives from industry associations to review the CBI data provided by manufacturing sites were held on 9 and 10 March 2021. ECVM supplied additional information on VCM emissions methodologies, biofilters and CMR (Carcinogenic, Mutagenic, Reprotoxic) substances in air emissions.

Finalisation of the revised draft Best Available Techniques conclusions will take place during the final TWG meeting, tentatively scheduled in June 2021, depending on the evolution of the COVID-19 situation. A 'Background Paper' will be issued six to eight weeks before the final TWG meeting. The possible consequences for PVC are increased monitoring frequencies and more effective abatement equipment required for dust emitted by driers. Industry hopes to avoid an obligation to incinerate all emissions containing VCM, especially those from the VCM recovery section. Publication of the BREF is expected in 2022 at the earliest. According to the Industrial Emissions Directive, Member States then have four years to complete the implementation of operating permits.

ECO-LABELS UPDATE

During the June 2020 EU Eco-Labelling Board (EUEB) meeting, the criteria for 'Printed paper, stationery paper, and paper carrier bag products' were discussed. The 'PVC shall not be used' wording in a former draft European Commission's Decision was removed. The wording in the proposed criteria for 'Electronic displays,' reads 'Plastic parts >25g must not contain chlorinated polymers'. There is, fortunately, a note stating, 'For this specific sub-requirement, plastic cable housing is not considered as a "plastic part."' The EU Eco-Label for footwear has been prolonged from 2022 until 31 October 2025, which removes short-term opportunities to challenge, again, criterion 1.5 that states, 'PVC plastic shall not be used in any part of the product.' In the JRC report on 'printed paper, stationery paper, paper carrier bags', it is recommended to exclude the use of PVC specifically with the rationale, 'The exclusion aligns with the criteria for other product groups, such as footwear or furniture.' This kind of spill-over was expected and ECVM, of course, provided comments on such proposals.

No PVC relevant issues were raised during the November EUEB meeting, which was primarily devoted to discussing communication plans to achieve a wider uptake of the EU Eco-Label.

ECVM

POTENTIAL LISTING OF MEDIUM CHAIN CHLORINATED PARAFFINS AS SUBSTANCE OF VERY HIGH CONCERN AND PERSISTENT ORGANIC POLLUTANT

Used as plasticisers and anti-flame agents in PVC cable insulation formulations, Medium Chain Chlorinated Paraffins (MCCPs, CAS 85535-85-9) are crucial components to allow PVC cables to meet fire regulations. While potential alternative solutions are being examined, so far no alternatives with comparable performance have been identified. With an average level of 6-8% of MCCPs used in formulations, it is estimated that ca. 15000 tonnes of MCCPs are used in the EU market for PVC cables.

Following the EU REACH substance evaluation by the UK Environment Agency (UK EA), ECHA has proposed to identify MCCPs as a SVHC as it would meet the PBT*/vPvB** criteria. ECHA is preparing a dossier in accordance with the requirements as set out in Annex XV of REACH and publication in the Registry of SVHC intentions will follow shortly. ECVM follows the progress of all relevant proposals through the SVHC identification process, from the notification of the intention until the outcome. ECVM has submitted comments during the first EU Call for Evidence that was open until 15 December 2020, stressing reduced performances, recycling challenges and strong cost penalties incurred when alternatives are used.

Based on their substance evaluation, the UK EA has issued a draft proposal to nominate MCCPs as a Persistent Organic Pollutant (POP) under the Stockholm Convention. The proposal recommends that MCCPs are nominated for inclusion on either Annex A (Elimination), Annex B (Restriction) or Annex C (avoid unintentional production). This process will take place ahead of the completion of the EU processes (SVHC identification) and may have an impact on the global production, use and waste processing of products containing MCCPs. ECVM, VinylPlus and PVC4Cables have signed a joint industry coalition letter to raise concerns with the nomination and process and participated in the commenting period closing on 15 March 2021.

** Persistent, Bio-accumulative, Toxic ** very Persistent, very Bio-accumulative*

VinylPlus®

LEAD STABILISERS IN PVC

Following the adoption of the resolution by the EU Parliament in February 2020, Commissioners Sinkevičius and Breton and DG ENV and DG GROW struggled to reach a consensus on how to proceed (see also Backstage Pass – April 2020 and Backstage Pass – October 2020).

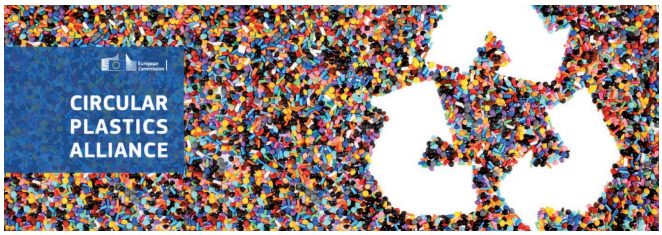
While DG GROW appeared to lean towards mandating ECHA to carry out a LCA analysis on waste management options, DG ENV launched a tender for a study on *The use of PVC (Poly Vinyl Chloride) in the context of a non-toxic environment*. The study has a broad scope encompassing disposal options for PVC, alternatives to PVC applications and a phase-out scenario for PVC. Although not officially announced by the EU Commission, the selected consultancy Ramboll has already started to contact stakeholders across Europe.

At the same time, discussions are ongoing between DG GROW and DG ENV to find an agreement on an amended restriction proposal. A decision, which is likely to be reached in March 2021, will be then discussed with the ENVI Committee of the EU Parliament.

NEXT STEPS

- **Timing TBC:** Official communication of the European Commission on the restriction proposal on lead in PVC
- **December 2021:** Planned publication of DG ENV study

LATEST NEWS ON THE CIRCULAR PLASTICS ALLIANCE (CPA)



We reported in the Backstage Pass – October 2020 that 'the next CPA deliverables are a more detailed R&D plan with rough timing and recycled volume objectives, due by October 2020, followed by several in January 2021.' It now appears that information on overall costs and volumes has been drawn from other (partly external) sources and that this high-level general information is sufficient to start entering into discussions with Member States - a necessary and rather urgent step. For R&D between 2021 and 2025, the total estimated cost is 75 -100 million euros.

The report on recycled content was delivered to the European Commission on 22 January 2021, with the topic discussed during the February Steering Committee. The report will now need to be refined and completed with an inventory of all legal, economic and technical requirements. Further, the design of the monitoring system has now been completed. The EU Commission has yet to formally decide on the inclusion of pre-consumer waste in recycled amounts. Preliminary indications are positive (with e.g. an adjustment of the overall target of 10 million tonnes). The report on *Untapped potential, including overview of production of recyclates* will be delivered in March 2021.

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FROM THE NON-TOXIC ENVIRONMENT TO THE CHEMICALS STRATEGY FOR SUSTAINABILITY

On 14 October 2020, the EU Commission published the Chemicals Strategy for Sustainability (CSS) which aims to protect citizens and the environment from hazardous chemicals through the development of safe and sustainable alternatives.

HEADLINE INITIATIVES

- Simplify current regulatory frameworks through 'one substance – one assessment' approach.
- Develop new rules on very persistent chemicals, including specific actions on poly- and perfluoroalkyl substances (PFAS) and endocrine disruptors (EDs).
- Introduction of a 'Toxic-Free Hierarchy' framework (reminiscent of Waste Hierarchy) to 'avoid substances of concern for non-essential uses'.
- Product legislation for substances of concern building more on generic risk assessment.
- New criteria on safe and sustainable by design to minimise the presence of substances of concern in products.
- Limit as far as possible the use of derogations and authorisations for substances of concern in recycled materials.
- The construction sector is singled out as high priority for stricter product regulation.

The ENVI Committee of the EU Parliament welcomed the CSS on 15 October 2020 during a debate with Commissioner Sinkevičius. MEPs were pleased about the inclusion of sustainability by design but expressed concerns over the possibility for exemptions from the planned endocrine disruptors ban. The ENVI Committee underlined the objective to achieve non-toxic material cycles.

During the Environment Council on 17 December 2020, all EU Member States welcomed the CSS and discussed their various perspectives. Official conclusions were adopted at the Environment Council on 18 March.

NEXT STEPS

- **Q2 2021:** Planned communication on the Zero Pollution Action Plan
- **Q4 2021:** Planned sustainable products initiative (legislative)

REVISION OF THE ENERGY PERFORMANCE OF BUILDINGS DIRECTIVE (EPBD)

A roadmap was published by the European Commission at the end of February 2021. The revision aims, among others, to facilitate the decarbonisation of the building sector – a vital component to deliver on the EU's 2030 and 2050 climate and energy objectives given that buildings are responsible for 40% of total energy consumption and 36% of energy-related greenhouse gas emissions in the EU. Currently, two thirds of the energy used for heating and cooling of buildings come from fossil fuels. Decarbonisation requires energy renovation at a large scale as almost 75% of the EU's building stock is inefficient, according to current building standards. The weighted annual energy renovation rate is persistently low, at around 1%, and, in some parts of the EU, hardly any energy renovations are carried out. The existing legislative framework is not sufficient to achieve the necessary decarbonisation of the EU building stock. Stronger EU level action is necessary to ensure policy alignment towards decarbonisation of buildings, particularly through a higher renovation rate.

The revision of the EPBD would aim to strengthen the legal framework on energy performance of buildings. Together with the other actions from the Renovation Wave action plan, it will aim to at least double the annual energy renovation rate of buildings by 2030, foster deep energy renovation, and contribute to the achievement of the EU's energy and climate objectives for 2030 and the climate neutrality objective for 2050. Three options are outlined:

- No policy change (baseline scenario)
- Reinforced non-regulatory policy instruments and additional guidance and support measures
- Amending the EPBD to translate the actions proposed in the Renovation Wave and the increased ambition towards building decarbonisation into legislation

PlasticsEurope, with the support of VinylPlus, is preparing a supportive reply that stresses that priority should be given to the renovation of the 'building envelope' (i.e. complete and effective thermal insulation of all building components that are in contact with the exterior). Besides the environmental impact reduction and economic benefits for occupants, deep renovations ensure improvement in comfort and health of occupants and provide numerous jobs at the local level. For all such reasons, PlasticsEurope is expected to strongly support option 3.

VinylPlus®

VINYLPLUS® MED: A NEW PROJECT TO ACCELERATE SUSTAINABILITY IN HEALTHCARE

COVID-19 has highlighted the crucial role played by single-use plastic medical devices in the prevention and control of infection in hospitals. The surge in the need of such disposable items has shed light on the challenges of properly managing and discarding them after use. PVC is the most common plastic used in life-saving disposable medical devices including oxygen and anaesthetic masks, tubing, IV and dialysis bags. Many of these devices, used once and for a short period of time on non-infectious patients, can be recycled.

Adequate sorting and recycling of non-infectious plastic waste can significantly reduce both the environmental impact of hospitals and their operational costs. Building on the success of the VinylPlus-funded RecoMed recycling scheme, VinylPlus has launched VinylPlus® Med – a collaborative partnership to accelerate sustainability in European healthcare. Starting with a pilot project in Belgium, VinylPlus® Med is now developing a recycling scheme for single-use PVC medical devices to help hospitals to properly sort their PVC medical waste stream. The scheme will focus on clean and REACH-compliant PVC waste that can be recycled into a wide range of value products marketed across Europe.

In partnership with the *Europe Hospitals*, high-quality and non-infectious PVC waste from various departments will be collected and recycled. The project will partner with Raff Plastics as the recycler and with waste management companies in Belgium. All Belgian VinylPlus® Med partners are located within a radius of 120km to minimise transport distances, thus mitigating carbon footprint. Click here to view the launch video.

VINYLPLUS SUSTAINABILITY FORUM 2021 – SAVE THE DATE!

The VinylPlus Sustainability Forum 2021 will take place on 17 June in Brussels. To celebrate the achievements of the 10-year VinylPlus programme and to officially launch the new 10-year commitment of the European PVC industry to sustainable development, we have decided to come full circle, hosting our annual conference in the European capital where it all started. The VSF2021 will be a hybrid event, live from Brussels, with an online audience.

Make sure to mark 17 June in your diary.

REGISTRATION WILL OPEN SOON!

The VinylPlus® Product Label

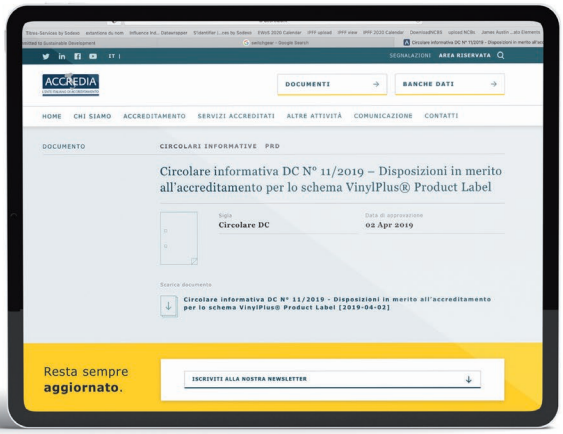
FIRST SKIN FOAM SHEETS CERTIFIED WITH THE VINYLPLUS® PRODUCT LABEL

The company profine has become the 11th PVC converter joining the VinylPlus® Product Label Community, with 10 profile systems and the very first five skin foam sheets certified with the VinylPlus certification scheme. VinylPlus congratulates profine for the excellent work done during the audit, despite the difficult conditions created by the COVID-19 pandemic and hopes that the Product Label will help the company in its sustainability journey. With this new certification, a total number of 128 PVC products manufactured in 10 European countries currently hold a valid VinylPlus® Product Label certificate.

EUROPEAN WIDE VALIDATION OF THE VINYLPLUS® PRODUCT LABEL FOR AN ISO/IEC 17065 ACCREDITATION

Since April 2019, the VinylPlus® Product Label remains as one of the few voluntary sustainability certifications validated for an ISO/IEC 17065 accreditation by Accredia, the Italian accreditation body. Sustainability schemes included in public procurement specifications generally require compliance checks by certification bodies that are specifically accredited for these schemes.

To help certification bodies to include the VinylPlus® Product Label in the scope of their ISO/IEC 17065 accreditation, Accredia and VinylPlus have successfully launched and completed the EA-1/22 procedure of the European Cooperation for Accreditation (EA). This has allowed the extension of the Italian validation to 36 national accreditation bodies who are members of the EA. This decision has been officially announced on the Accredia website. VinylPlus aims to work exclusively with certification bodies who recognise the VinylPlus® Product Label within the scope of their ISO/IEC 17065 accreditation in the future.



The VinylPlus® Product Label

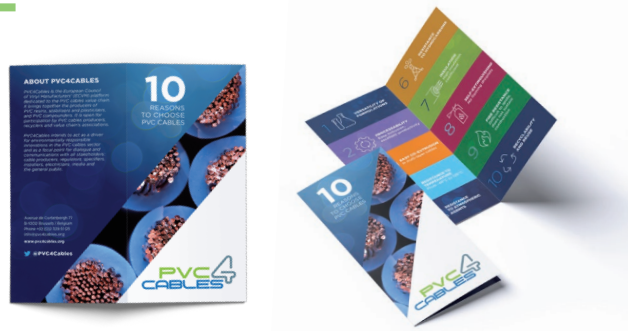
FIRST SUSTAINABILITY SCHEME DEDICATED TO PLASTICS RECOGNISED IN BREEAM

The VinylPlus® Product Label has become the very first certification scheme dedicated to plastic building and construction products to be recognised as Responsible Sourcing Certification Scheme (RSCS) in both BREEAM® and Home Quality Mark® (HQM). Owned by the Building Research Establishment (BRE), BREEAM is the world's most used sustainability assessment method for measuring the environmental, social and economic sustainability performance of buildings and HQM is a certification scheme which helps UK house builders to demonstrate the quality and sustainability performance of their new homes. Both schemes support responsible sourcing by rewarding projects that use products certified by a RSCS.

Thanks to BRE's tough yet successful assessment of the VinylPlus® Product Label, users of PVC products that are certified with any versions of the VinylPlus scheme will be given enhanced sustainability recognition and allow them to increase the market value of their BREEAM- and HQM-certified assets. The VinylPlus certification scheme has been given a score level 4 by BRE. The next versions of the VinylPlus certification scheme will be designed to achieve a higher score. Further guidance on how responsible sourcing is promoted in BREEAM and HQM can be accessed here. Guidance Note 18 explains to the users of Vinyl Verified® products how they can earn extra credits.

PVC4Cables

10 REASONS TO CHOOSE PVC CABLES



Despite the current pandemic situation, PVC4Cables proactively continues to engage in the promotion of PVC cables, highlighting their contribution to sustainable development and the circular economy, as well as their numerous technical and functional benefits for final users and consumers. For this purpose, PVC4Cables has recently published a new leaflet highlighting the '10 reasons to choose PVC cables'. Also have a look at the new animation.

PVC4CABLES AT PVC CONFERENCES

In 2020, PVC4Cables actively participated in two conferences. At AMI Cables 2020 Conference in March 2020, two papers were presented: New PVC Compounds for Cables with Low Hydrochloric Acid Emission (G. Sarti and M. Piana) and Energy Consumption and CO_2 Emission due to the Life Cycle of PVC, XLPE and PE Low Voltage Electrical Cables (J.M. Baldasano). At the virtual conference PVC Compounding and Production Cycle Forum on 15 June 2020, three projects were presented: Performances and Innovation of PVC in Cables (G. Sarti), Improvements of Flame Retardancy and Safety of PVC Compounds in Case of Fire (C. Cardelli) and Total Cost of Ownership of PVC cables and Cost-Benefit Analysis of PVC Cables Recycling (A. Marangoni). Participation in these two events were covered in various specialised European media. In 2021, numerous running projects and studies will enable to continue assuring important conference and media presence.

PVC4CABLES ON TWITTER

PVC4Cables is steadily building its presence on Twitter with around 260 followers coming from the global cable community. Follow us!

PVC4Pipes

PVC PIPES HAVE NO IMPACT ON MICROPLASTICS CONTENT OF DRINKING WATER

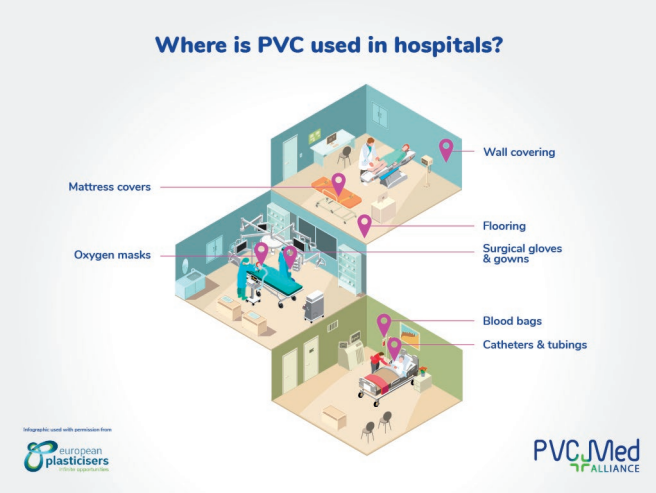
A study commissioned by the Dutch water utility *Dunea* shows that the drinking water network, predominately made of PVC pipes in the Netherlands, has no impact on microplastics content in drinking water. The research carried out in 2019 and 2020 by a water laboratory first examined the level of microplastics in water up to and including the purification stage, then second, the level of microplastics in water at the user stage when consumers retrieve water from their taps. Thanks to the study, an interesting question was answered: are plastic particles added when water flows through PVC pipes? This turned out not to be the case! Read more.

PVC4PIPES STUDY DEMONSTRATES COST BENEFITS FROM PVC PIPES RECYCLING

With a view to estimate the cost benefits of PVC pipes recycling at the end of the pipes' service life, PVC4Pipes commissioned Professor Marangoni (*Althesys*) to run cost-benefit analyses to compare recycling to landfilling and incineration for homogeneous pipes in Italy, and recycling to incineration for homogeneous and 3-layer pipes in Germany. The results show a positive net balance of PVC pipes recycling for all cases with the revenues from recycled material shown as the main benefits with collection and sorting as the main costs. In Italy, the net benefits of recycling compared to landfilling are greater than recycling compared to incineration due to the value of energy recovery (electricity and heat) during incineration. In Germany, the 3-layer pipes show a net benefit lower than homogeneous pipes because they contain an inner layer of (previously) recycled PVC, whose value is lower. The study results will be presented at the forthcoming Plastic Pipes XX Conference (Amsterdam, 6-8 September 2021).

PVCMed

NEW INFOGRAPHICS: PVC USES IN HOSPITALS AND PATIENT AND HEALTH WORKER SAFETY



Infographics are an effective way to communicate often complicated matters concisely. The benefits can be seen in our newly developed infographic, used with permission from European Plasticisers, that shows various places where PVC is used in hospitals. The infographic can be downloaded here.

The COVID-19 pandemic has clearly revealed the huge challenges and risks facing health workers globally. Consequently, health worker safety as a prerequisite for patient safety was the theme of WHO's World Patient Safety Day in September 2020. To highlight the essential role of PVC and plastics, PVCMed developed a social media campaign based on an infographic that can be downloaded here.

DESIGN COMPETITION FOR EUROPEAN STUDENTS

Collecting and sorting PVC medical waste at hospitals is a task that must be carried out by nurses. It is essential that these additional tasks given to healthcare workers, who are already busy with their daily nursing duties, yield tangible results such as by ensuring that collected and sorted waste is recycled into products that are beneficial for society. Taking inspiration from the South African PVC medical recycling project *My Walk* where PVC medical waste is turned into school shoes donated to disadvantaged children, PVCMed will organise a design competition for European students in 2021.

The idea is to first introduce students to high quality PVC medical waste recyclates. Technical experts from the PVC industry will host webinars to educate participating students in the material's properties and the different converting technologies that are used to transform these recyclates into applications. Based on the technical introduction, the students are expected to come up with interesting and original ideas on how PVC medical plastic waste can find a useful second life.

INDISPENSABLE BUT NOT WITHOUT CHALLENGES: MEDICAL PLASTICS AND THE COVID-19 CRISIS

The COVID-19 pandemic has shown just how essential plastic is in the healthcare sector. But the growing use of plastic-based medical devices and PPE has also led to mountains of hospital waste causing a backlash against polymers. How do we solve this waste challenge? Can recycling be part of the solution?

On 2 December 2020, PVCMed Alliance's Project Manager Ole Grøndahl Hansen spoke on this topic at the online conference, Plastic in the Medical Device Industry, organised by the Danish Academy of Technical Sciences. He highlighted that PVC is the market leader with a share of 40%. He showed the valuable contributions of new PVC applications towards the fight against COVID-19 while addressing the negative consequences of mounting waste.

To address this issue, he suggested solutions for the further uptake of recycling if reuse is not possible. Indeed, recycling is already in place for PVC-based medical devices around the world. While barriers related to contamination must be surmounted, studies show that a quarantine period of at least seven days would be sufficient to kill the virus. Download presentation here.

PVCMed

PVCMED IN THE MEDIA

Over the years, PVCMed Alliance has regularly contributed to relevant trade media with articles, op-eds and interviews. Now, the Alliance is increasingly seen as a credible source of information regarding the use of PVC in healthcare.

This was recently demonstrated when leading plastic trade media PlasticsToday asked PVCMed for an article on medical PVC for their series on medical plastics. The article will contain an overview on the history of PVC and its early uses, properties that make it desirable in medical applications, limitations, alternative polymers and the controversy over phthalates.

Medical plastic recycling is becoming a hot topic following the increase in plastic use due to COVID-19, both in and outside hospitals. The Healthcare Plastics Recycling Council recently organised a webinar on medical plastic recycling which was covered by the online magazine Medical Device and Diagnostic Industry (MD+DI). This online article stressed the many challenges related to medical plastic waste recycling that made it appear almost impossible to initiate recycling projects. To counter this message, PVCMed penned an op-ed to encourage the medical device industry and hospitals to start recycling, to face and learn from challenges and not strive for perfection in the first shot. Here, the successful PVC medical recycling schemes around the world where challenges are solved along the way, can serve as inspiration. Read the op-ed here.

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