Appendix E – Key information on the calls for evidence

Targeted call for evidence on the list of PVC additives (CfE1)

This call for evidence was targeted to a set of industry stakeholders identified based on ECHA’s earlier projects and through VinylPlus and PlasticsEurope. The call for evidence was organised via email. The objective of the call for evidence was to identify with the help of the stakeholders the PVC additives currently used in the EU, their functions and typical concentrations and whether they were used in soft or rigid PVC. Also information R&D activities on additives were requested.

ECHA prepared for the call a tentative list of additives used in PVC based on information from the Plastic additives initiative (PLASI) and a DG ENV report on PVC and its additives. As a preparation of the call for evidence, two calls were arranged with key stakeholder representatives. The stakeholders confirmed whether the listed substances were in use and indicated additional substances in use which were not on the list.

The call for evidence was open for input approximately two months during the summer 2022. After the call for evidence, a (virtual) stakeholder meeting was organised on 22 September 2022 to clarify further questions and to present and discuss the results with the stakeholders. The results are described in Appendix B.1 and B.2 of this report and in the main report.

In total 17 stakeholders, industry associations and companies, submitted information.

Public call for evidence on the volumes, uses and exposures of PVC additives in focus (CfE2)

This call for evidence was run between 02/11/2022 and 06/01/2023. The request is located on ECHA’s website: https://echa.europa.eu/previous-calls-for-comments-and-evidence/-/substance-rev/71301/term.

The objective of the call was to retrieve information on the volumes by sector and end-use for PVC volumes and for additives selected by ECHA for closer scrutiny. Furthermore, end-of-life information (e.g. recycling rates per use) and measured exposure information were requested.

In total 77 stakeholders submitted information. Submission from in total 25 countries (Japan, the U.S., Thailand, Canada, Brazil, Australia, Norway, Switzerland, United Kingdom, Sweden, Poland, Nether lands, Lithuania, Italy, Greece, Germany, France, Finland, Denmark, Czech Republic, Belgium, Austria) were received.

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1 Plastic additives initiative - ECHA (europa.eu)
2 https://op.europa.eu/en/publication-detail/-/publication/480e0773-9068-11ec-b4e4-
01aa75ed71a1/language-en
Industry or trade associations (43) and companies (23) were the stakeholders with the highest number of submissions. Also three NGOs (Health and Environment Alliance (HEAL), Zero Waste Europe, European Environmental Bureau (EEB)) submitted information as well as two EU Member States (Germany and Norway). The results of this call for evidence are summarised and used in various sections of the report and specific responses referenced, where relevant.

Submitters distribution by country and type are shown in Figure 1 and Figure 2.

![Figure 1. Number of submitters by country from the EU (dark blue), EEA (light blue) and outside of the EEA (red)](image1)

![Figure 2. Number of submitters by organisation type](image2)
Public call for evidence on alternative additives in PVC and other plastics (CfE3)

This call for evidence was run between 01/02/2023 and 31/03/2023. The request is located on ECHA’s website: https://echa.europa.eu/previous-calls-for-comments-and-evidence/-/substance-rev/72201/term.

The objective of the call was to retrieve information on 1) alternative substances to the currently used ‘additives in focus’ in PVC and 2) additives used in alternative plastics to PVC.

For the first part it was requested information about alternatives to the currently used ‘additives in focus’, the availability of the potential alternatives to currently used ‘additives in focus’, the performance of these alternatives in relation to key performance criteria (KPC), and ‘additives in focus’ that cannot be replaced. We also collect information related to substitution costs and transitional period.

For the second part it was requested information about the additives (not limited to ‘additives in focus’) that are used in alternative plastics to PVC. Stakeholders were invited to make additions to the ECHA’s tentative list of alternative plastics (pre-filled excel-file), and to provide information for the additives used in alternative plastics in their chosen data format.

In total 81 stakeholders submitted information. Submission from in total 21 countries (Japan, United Kingdom, Argentina, Australia, Brazil, Taiwan, Thailand, US, Norway, Switzerland, Belgium, Germany, France, Italy, Netherlands, Poland, Czech Republic, Denmark, Ireland, Lithuania, Sweden) were received.

Industry or trade associations (41) and companies (32) were the stakeholders with the highest number of submissions. Also two NGOs (Zero Waste Europe, Arnika) submitted information as well as two EU Member States (Germany and Sweden). The results of this call for evidence are summarised and used in various sections of the report and specific responses referenced, where relevant.

Submitters distribution by country and type are shown in Figure 3 and Figure 4.
Figure 3. Number of submitters by country from the EU (dark blue), EEA (light blue) and outside of the EEA (red)

Figure 4. Number of submitters by organisation type