Comments on the Recommendation for inclusion in the Authorisation List of several lead based substances – Contribution to the Public Consultation

Background

VinylPlus is herewith replying to the call for information (on behalf of the Commission) on the possible socio-economic consequences of the authorisation requirement for several lead based substances, i.e.

- Pentalead tetraoxide sulphate, CAS number 12065-90-6
- Tetralead trioxide sulphate, CAS number 12202-17-4

Comments

In response to the Public Consultation on the above mentioned proposal the stakeholders of the PVC supply chain represented by VinylPlus wish to provide the following comments.

We remind ECHA and the Commission that lead-based stabilisers used in PVC articles are subject to an industry voluntary phase out in the EU by the end of 2015. More than 80 % of the initial volume of lead-based stabilisers has already been phased out, and the European PVC industry is on track to fulfil its phase-out commitment by end 2015.

However, lead-based stabilisers have been widely used in PVC products over many years. Due to the long life time of most PVC products (e.g. typically 40 years for window profiles, more than 50 years for pipes), lead is expected to be present in PVC waste for many years to come. VinylPlus committed to recycle 800,000 tonnes of PVC waste per year by 2020, a large proportion of which being post-consumer waste and hence likely to contain lead based substances. This recycling effort is undertaken for the sake of resource efficiency, in line with the thinking between the “Circular Economy” package.

We would like to stress the huge socio-economic impact of regulations potentially restricting the recycling of lead-containing PVC waste. The consequences have been thoroughly

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evaluated by Dutch consultant TAUW: the report can be downloaded from http://www.vinylplus.eu/publications/75/62/Impact-of-lead-restrictions-on-the-recycling-of-PVC . More specifically for the present consultation we wish to stress that inclusion of the above mentioned substances in the authorisation list would lead many of the numerous SMEs typically involved in PVC recycling to cease handling post-consumer waste, thereby destroying industry's efforts over the past 15 years to enhance such recycling, and leaving incineration with or without energy recovery as the only option.

We ask the EU authorities to bear in mind that lead embedded in a PVC plastic matrix has low bio-availability. Modelling of lead migration from PVC pipes into water has been carried out, complementing several experimental studies done in the past by water institutes such as KIWA in the Netherlands. These documents can be provided on demand. A study recently launched by the Commission is expected to assess in a comprehensive way the bio-availability of hazardous substances present in plastics waste.

14 November 2014

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