Polymer Comply Europe

Regulatory frame PVC recycling

PRS show

29 March 2017

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Regulatory frame

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Waste

- Waste framework directive
- EU List of Waste
- ADR (transport)
- End of Waste

Product regulation

- REACH
- Construction Product Regulation
- ELV
- ROHS

Packaging & packaging waste

Mainly National/regional implementation

Mainly harmonized

Managing legacy substances

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- PVC is used mainly in long life applications such as construction, automotive…
- Substances with hazardous properties have been used in the past as additives for PVC
- Most of those have been substituted for virgin raw materials : DEHP, BBP and DBP plasticizers, lead stabilizers
- Due to their ubiquity in post-consumer waste, they will remain to be managed in the recycling of major applications this stream for the coming decades
- More than 40 million of tonnes of secondary material at stake

Legacy substances regulatory pressure

- More and more regulatory pressure :
- Recyclers having reached end of waste had to apply for the authorization of DEHP in soft PVC recyclate (those recyclers wanted to ensure their customer do not have to apply for a waste recycling permit) : **authorization granted to the 3 applicants Vinyloop Ferrara SPA, Plastic Planet and Stena recycling AB until February 2019**
- Denmark and Echa proposed restriction on DEHP, BBP, DBP and DiBP (articles in prolonged contact with human skin, articles indoor with exception of agricultural and industrial applications) **Ongoing. Final opinion around June 2017**
- LMW phthalates will be banned from E&E applications in 2019

Legacy substances regulatory pressure

- Lead has been used mainly in PVC pipes, window profiles and cables as a stabilizer
- Lead has been restricted in consumer articles that may be put into mouth **guidance discussed, extensive interpretation**
- Lead stabilizers have been proposed for restriction : **final decision expected in second half 2018.**
- 2 lead stabilizers (pentalead tetraoxide sulphate & tetralead trioxide sulphate) have been proposed for authorization under REACH.

Way forward

- Use of recyclate containing legacy substances should be considered on a risk based approach
- The proposed measures should be proportionate to the risk (e.g. migration from PVC matrixes is extremely low)
- Enabling the transition to applications with lower impurities content can be ensured through :
  - Traceability
  - Certification
  - Controlled loops
  - Product safety and quality standards

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