



EUROPEAN COUNCIL
OF VINYL MANUFACTURERS

A division of *PlasticsEurope*

Ms Rita Gross
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Brussels, 13 March 2008

Object: Inventory of hazardous substances used in EEE drafted by Öko-Institut in the framework of the "Study on Hazardous Substances in Electrical and Electronic Equipment (EEE), not Regulated by the RoHS Directive"

Dear Ms Gross,

Please find hereafter the comments of ECVM on the list referred to in the Object.

ECVM (The European Council of Vinyl Manufacturers) represents the European PVC resin producing companies and is a division of **PlasticsEurope**. Its membership includes the 14 leading European PVC resin producers which together account for 99% of EU 27 production. ECVM is also a leading partner of **Vinyl 2010** - the organisation implementing the Voluntary Commitment of the PVC Industry - together with ESPA - representing the stabiliser producers, ECPI - representing the plasticiser producers and EuPC - representing the PVC converters.

PVC MENTIONED AS HASARDOUS SUBSTANCE

The list includes PVC under item 21. The column "hazard" states "Dependent on the additives (stabilisers and plasticisers) used; Dioxin formation during incineration; Source of organic bound chlorine".

We strongly object to the blanket inclusion of PVC in this inventory of hazardous substances, for the following reasons:



REGULATORY AND DEFINITIONS

PVC together with its additives is not a substance, but a material, or a preparation as defined in REACH. Hence PVC should not at all be mentioned in this list of substances. Otherwise all other materials should be mentioned as well.

Commission Decision 2001/118/EC “amending Decision 2000/532/EC as regards the list of wastes” does not mention PVC. This Decision mentions plastics waste under several entries which could be relevant for E&E waste, namely:

- 160119 (plastic waste not otherwise specified),
- 191204 (plastics and rubber waste from mechanical treatment of waste),
- 200139 (plastics from municipal wastes including separately collected fractions)

All these entries qualify such plastic waste as non-hazardous.

There is therefore no legal or scientific basis for

- **Treating PVC waste differently from plastic waste in general,**
- **Qualifying any plastic waste from E&E applications as hazardous.**

Likewise, the “Basel Convention on the Control of the Transboundary Movements of Hazardous Wastes and Their Disposal” does not consider PVC waste as hazardous. In 1997, at the twelfth session of the Technical Working Group of the Basel Convention, it was recognised that plastic wastes - including those of chlorinated polymers and copolymers - do not have *intrinsic* hazard characteristics. As far as we are aware, no country has informed the Basel Secretariat that PVC waste has been included in its national definitions of hazardous wastes.

TECHNICAL – DIOXIN FORMATION DURING INCINERATION

Dioxin can and will be produced during any incineration process, because there is always enough halogens present in the waste to reach the plateau above which increased halogen concentration does not significantly affect dioxin production.

The European Union Commission published in July 2000 a Green Paper on the Environmental Issues of PVC. The Commission states that: *“It has been suggested that the reduction of the chlorine content in the waste can contribute to the reduction of dioxin formation, even though the actual mechanism is not fully understood. The influence on the reduction is also expected to be a second or third order relationship. It is most likely that the main incineration parameters, such as the temperature and the oxygen concentration, have a major influence on the dioxin formation”*. The Green Paper states further that **“at the current levels of chlorine in municipal waste, there does not seem to be a direct quantitative relationship between chlorine content and dioxin formation”**.

These views are based on more than ten in-depth studies carried out in various parts of the world. Moreover, the EU Waste Incineration Directive sets a stringent emission limit of 0.1 ng I-TEQ/m³, which is met by properly designed and operated incinerators, irrespective of the type of waste they treat.



PVC MENTIONED AS APPLICATIONS FOR OTHER NAMED SUBSTANCES

In Entry 7 (Bisphenol A), the column “Main use in EEE” states “Polycarbonate plastic in electronic devices, medical equipment; in PVC as hardener, catalyst, binding agents, stabiliser; epoxy resin production”. **This information is not entirely correct, or wrongly formulated.** Bisphenol A is only used in the preparation of additive packages for PVC processing, and as an anti-oxidant in the production of plasticisers for use in PVC processing. Since the voluntary discontinuation of use as inhibitor in PVC (polymer) production, the remaining uses are considered adequately controlled by the risk management measures in place. See EU Risk Assessment dated 2003.

In Entry 22 (PCBs), the column “Main use in EEE” states “Flame retardant in PVC plastic cable; capacitors”. **This information is completely out of date.** PCBs use in PVC was discontinued at least 30 years ago.

In Entry 28 (Short-chained chlorinated paraffins (SCCP) (Alkanes, C10-13, chloro), the column “Main use in EEE” states “plasticisers in PVC (cable) flame retardant plasticisers”. **This information is also out of date.** SCCP are no longer used in PVC.

For the reasons detailed above, we request you to delete entry 21, correct entry 7 and delete PVC from the “main uses” of entries 22 and 28.

Yours sincerely

Jean-Pierre De Grève
Executive Director