*Brussels, 05 June 2025*

**To the kind attention of:**
Mr Stéphane Séjourné,
Executive Vice President of
the European Commission for
Prosperity and Industrial Strategy,

and

Ms Jessika Roswall,
Commissioner
for Environment, Water Resilience
and a Competitive Circular Economy

**Subject: restricting PVC and its additives under REACH - when can we expect regulatory action?**

Dear Executive Vice-President Séjourné,

Dear Commissioner Roswall,

**We, the undersigned non-governmental organizations,working on the protection of people and the environment from the risks of plastics, are writing to urge the European Commission to take immediate and ambitious action to restrict polyvinyl chloride (PVC) under the REACH Regulation.**

Today marks the World Environment Day - a day to promote sustainable practices to drive systemic change. This year's focus is plastic pollution and the message is clear that we need collective action to tackle this issue. Chemicals like PVC significantly contribute to widespread environmental contamination.[1]

[1] https://ec.europa.eu/environment/pdf/waste/pvc/en.pdf; The use of PVC (poly vinyl chloride) in the context of a non-toxic environment (2022)

Since the 1950s PVC has been widely used as a hard plastic across industries including construction, packaging and electronics. It is mechanically tough, water and chemicals resistant, and electrically insulating. It is also a material with well-documented environmental and health impacts throughout its history of use and its entire lifecycle: from the production of its carcinogenic building block vinyl chloride, to the use of toxic toxic additives, often replaced by equally problematic chemicals, to the persistent pollution caused by its waste - in Europe and beyond.[2] [3]

PVC is not a novel issue, and yet its impacts remain highly relevant. A recent investigation in France revealed alarmingly high levels of vinyl chloride, one of the key ingredients in PVC, into drinking water in more than 5 000 municipalities[4], traced back to leaks from PVC water pipes.[5] This issue is not unique to France - researchers are now uncovering similar patterns of contamination across Europe. In addition researchers continue to uncover concerning effects of chemicals released from PVC products on health, such as its disrupting effect on sleep patterns, an issue closely linked to overall physiological function and overall health.[6] Research from Belgium has shown that despite regulations, premature infants continue to be exposed to harmful chemicals from PVC medical devices linked to developmental risks, as regulated additives have been replaced by alternatives that pose similar health concerns[7]. Additionally, PVC microplastics, which can persist in ecosystems for long periods, are a growing concern as they may pose health risks to humans and wildlife.

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[2] https://www.epa.gov/newsreleases/epa-begins-process-prioritize-five-chemicals-risk-evaluation-under-toxic-substances; Risks Associated with the Presence of Polyvinyl Chloride in the Environment and Methods for Its Disposal and Utilization; https://chm.pops.int/Portals/0/download.aspx?e=UNEP-POPS-POPRC.19-9-Add.1.English.pdf

[3] https://echa.europa.eu/fr/-/echa-raises-environmental-concerns-over-certain-aromatic-brominated-flame-retardants.

[4] https://vert.eco/articles/leau-potable-de-votre-commune-est-elle-contaminee-au-cvm-ce-gaz-toxique-et-cancerogene-verifiez-sur-notre-carte-de-france-interactive.

[5] Gaspard Lemaire. Contamination des réseaux d'eau français au chlorure de vinyle monomère : étude de cas sur l'insécurité sanitaire en France. 2025. ffhal-05020590f; see also Le Monde article: https://www.lemonde.fr/planete/article/2025/01/16/plusieurs-centaines-de-milliers-de-francais-exposes-a-la-pollution-des-canalisations-d-eau-au-chlorure-de-vinyle-monomere-classe-cancerogene_6500671_3244.html.

[6] Plastics in everyday objects may disrupt sleep in same way as caffeine, study finds.

[7] https://www.sciencedirect.com/science/article/abs/pii/S0013935125005171

As part of the Chemicals Strategy for Sustainability, the EU Restrictions Roadmap identified PVC and its additives as candidates for a group restriction. In response, the European Chemicals Agency (ECHA) carried out an in-depth investigation, which underscored the need for regulatory action, particularly concerning the hazardous additives used in PVC. However, the issue extends beyond additives. **Both ECHA's findings and the bigger picture, including the recent pollution incidents[8], make it clear that a comprehensive restriction is needed, one that addresses not only the harmful additives but also PVC itself as a problematic material.**

A focus solely on some additive restrictions will not mitigate the systemic problems posed by PVC itself, including the release of persistent microparticles. As recognised by the European Environment Agency, PVC is a material that poses key challenges to high-quality plastic waste recycling.[9] Moreover, safe and more sustainable alternatives already exist in many applications, making the continued use of PVC increasingly difficult to justify. Some governments and corporations in Europe, and globally, are already adopting policies to phase out PVC but regulations must follow up to create a level playing field.[10] [11]

Despite evidence of the need to move fast, progress toward actual regulatory action has been unacceptably slow.

ECHA has provided robust evidence confirming that a REACH restriction is needed[12]. The scientific, environmental, and human health rationale is clear. **The logical next step is for the European Commission to issue a formal mandate to ECHA to initiate the preparation of a restriction.**

We therefore call on the Commission to:

1. **Confirm a clear timeline** for the preparation of a REACH restriction proposal on PVC and its additives.

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[8] LeMonde (2025) Plusieurs centaines de milliers de Français exposés à la pollution des canalisations d'eau au chlorure de vinyle monomère, classé cancérogène.
[9] EEA (2024) Plastics recycling in Europe: obstacles and options
[10] Nestle (2021) Nestlé is phasing out PVC from its packaging worldwide by 2025
[11] Tallinn (2025) Tallinn becomes the first European capital to ban PVC advertising in public space
[12] PVC Problem Very Clear – Why the ECHA report supports phasing out PVC as the most effective and future-proof risk management measure. PVC-Problem-Very-Clear.pdf

2. **Ensure the restriction mandate is ambitious in scope**, targeting PVC as a polymer and not just its associated substances.

3. **Engage ECHA and all relevant stakeholders, including civil society** meaningfully throughout the process to maintain high standards of transparency and accountability.

4. **Avoid delay and weakening of ambition**, in order to prevent further regrettable long-term contamination, which will become harder to mitigate in the future and will only increase the overall chemical burden on the environment and people.

Timely action is of utmost importance to uphold the EU's leadership in chemicals policy and support competitiveness of forward looking European companies. Our European wide petition asking the EU to phase out PVC by 2030 has already gathered the support of **62 NGOs** and close to 68 000 signatures.[13]

**When can we expect this restriction mandate to be submitted?** It is critical that the Commission provides clarity and commits to swift regulatory action.

**We stand ready to support this process and collaborate to ensure it delivers lasting protection for people and the environment.**

We look forward to your answer.

Please accept our respectful regards,

Patrick ten Brink, EEB Secretary General

Anais Berthier, Head of ClientEarth Brussels office

**On behalf of**:

Zero Waste Europe

Health Care Without Harm (HCWH) Europe

[13] https://action.wemove.eu/sign/202310-act_now_to_ban_pvc-petition-EN/.

Health and Environment Justice Support (HEJSupport)

ZERO - Association for the Sustainability of the Earth System

Gallifrey Foundation

Center for International Environmental Law (CIEL)

Surfrider Foundation Europe

The Rethink Plastic alliance

Ecologistas en Acción

Green Transition Denmark