



Brussels, 13 November 2023

Subject: Joint letter of the PVC & Recyclers Industries regarding the EU Waste Shipments Regulation's provisions on intra-EU plastic waste shipments

We, the undersigned associations, support a revision of the Regulation on Shipments of Waste (WSR) which would (1) facilitate shipments of waste for reuse and recycling in the EU (2) ensure that the EU does not export its plastic waste challenges to third countries and (3) tackle illegal waste shipments.

In the context of the current trilogue discussions on the WSR, we call on national delegations in the Council of the EU to **support the European Commission's proposal to maintain the EU3011 and EU48 lists for intra-EU shipments of plastic waste in the framework of the revision of the Waste Shipment Regulation.**

We understand that the Council of the EU is in favour of the European Commission's original proposal related to the green-listed waste for intra-EU shipments, and thus does not support the European Parliament's proposal to replace entries EU3011 and EU48 for intra-EU shipments of non-hazardous plastic waste with the corresponding Basel Convention entries B3011 and Y48. **We would like to stress the importance of maintaining this Council position and ensuring that the final text preserves the EU Green list of intra-EU waste shipments.**

The PVC industry's and recycling sector's primary concern lies in the area of PVC recycling, which would be negatively impacted by the removal of the EU green list EU3011. As [noted](#) by the Commission in its proposal for a Council Position for the 14th Basel COP in 2019, aligning already regulated intra-EU shipments with the Basel Convention entries would make plastic recycling in the EU more cumbersome and costly, with no environmental advantages, given that PVC is recycled safely across the EU. Moreover, the Basel Convention offers the possibility to have specific regional rules, and as such, the EU Green List does not conflict with the Basel Convention.

Replacing EU entries and making PVC waste subject to the Prior Informed Consent (PIC) procedure under Basel Convention rules would create a barrier to the movement of a material, which, although legally classified as waste, is a valuable resource for our industry and part of our circular business model. The PVC industry relies on recycled PVC waste as a resource. We object to measures preventing the necessary recycling of the waste by installing barriers to the movement of PVC recycle on the European market.



Creating barriers to the free movement of PVC waste within Europe would negatively impact the established and well-functioning PVC recycling schemes in Europe, which involve over 150 companies, the majority of which are SMEs. This will, in turn, undermine industry efforts to improve circularity, lowering PVC collection rates and hindering EU recycling targets and investments in clean solutions. The result will be greater landfilling and incineration, as well as increased reliance on virgin feedstock for PVC production - a clear contradiction to the EU's objective of reducing CO2 emissions by establishing a circular economy for secondary raw materials. These impacts are outlined in the attached joint Industry Position which includes several case studies.

PVC is recycled safely across the EU. The issue of the recycling of contaminated PVC is already tackled with a contamination threshold of 6% above which the Prior Informed Consent (PIC) procedure must be followed. Therefore, creating additional administrative burdens and costs has no added benefit for people and the environment, but instead hampers the progress toward circularity.

Signatories:

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