



Council of the
European Union

166774/EU XXVII. GP
Eingelangt am 13/12/23

Brussels, 13 December 2023
(OR. en)

16467/23
ADD 1

ENV 1457
MI 1094
DELECT 199

'I/A' ITEM NOTE

From:	General Secretariat of the Council
To:	Permanent Representatives Committee/Council
No. Cion doc.:	14775/23 + ADD 1 - COM(2023) 7088 final + Annex
Subject:	COMMISSION DELEGATED DIRECTIVE (EU) .../... of 25.10.2023 amending Directive 2011/65/EU of the European Parliament and of the Council as regards an exemption for cadmium and lead in plastic profiles in electrical and electronic windows and doors containing recovered rigid polyvinyl chloride <ul style="list-style-type: none">- Intention not to raise objection- Statement

STATEMENT BY DENMARK

Denmark has objected to the issuing of the delegated Directive due to concerns regarding the content of lead. Denmark acknowledges the intention from the Commission to further the circular economy and increase the recycling of PVC. However, Denmark is not in favor of the proposal by the Commission as regard lead and its compounds because Denmark is concerned that the proposal will lower the protection for European citizens and the environment. Further, we fear that the proposed threshold limit of 1,5% will not protect against the continued practice of actively adding lead to products produced with recycled PVC as a stabilizer.

There is no safe lower limit value for lead, which will provide full protection against damages on the kidneys and the development of the brain. Therefore, setting a sufficiently low limit level for lead in PVC is critical. Denmark considers the limit value of 0.1% appropriate, which will lead to the same protection whether the PVC profiles are made of new or recycled PVC.
