

EUROPEAN POSITIVE LISTS UNDER THE DRINKING WATER DIRECTIVE (DWD): Important Requirements to Ensure Continued Manufacture of PVC Pipes is Compliant!

Want to continue using your starting substances to manufacture Drinking Water (DW) applications (i.e. PVC pipes)?

Check that all your starting substances used/supplied for DW formulations are on the European Positive Lists and start organising the DWD notification/application in IUCLID asap!

Preparing Your DWD Notification of Intention and DWD Application – Why, What, and How?

If you miss to meet the below requirements, you may lose your right to supply or use specific starting substances to manufacture PVC pipes!

1. ASAP: Check You Are Compliant With the New DWD

- Ensure that the starting substances that you supply for, or use in, the manufacturing of PVC pipes are listed in the [European Positive List](#) (EU PL) for organics.
- **If the starting substance is on the EU PL:** ensure you supply or use it according to the applicable conditions of use and concentration limits and note the expiry date!
- **If the starting substance is NOT on the EU PL:** you may want to petition the missing substance(s) at national level to avoid a compliance gap in 2027 and to check the transition period at national level!
- **If the starting substance is listed with a short expiry date and/or if the substance is not listed on the EU PL:** prepare steps 2 and 3 below, including through collaboration with business partners producing the same starting substance, to optimise data cost-sharing.

2. As of 2025: Prepare Your DWD Notification of Intention in IUCLID

- Have your ECHA account ready and the latest version of IUCLID installed, completed, ready to pass automatic checks, and ready for submission to ECHA (should be quickly done, but you never know!).
- More information on the process, tools and guidance are available here: [DWD processes - ECHA](#).

3. As of 2026: Prepare Your DWD Application in IUCLID

- Reuse your Notification IUCLID file and start compiling further identity, hazard, exposure and use information (lengthy process!).
- More information on the process, tools and guidance are available here: [DWD processes - ECHA](#).

DWD Notifications and Applications are prepared in IUCLID and submitted via REACH-IT. Notifications and Applications can be submitted jointly (by the same legal entity!). However, any collaboration among interested parties will be the responsibility of those parties and ECHA will not intervene in the event of disputes over data sharing.

Legislative Context - What Should You Know?

Under Article 11 of the new [EU Drinking Water Directive \(DWD\) 2020/2184](#), the European Chemicals Agency (ECHA), supported by its Risk Assessment Committee (RAC), will support the European Commission in maintaining four¹ European Positive Lists of starting substances, compositions and constituents that are authorised for use in the manufacturing of materials in contact with drinking water. The new system will replace the fragmented national approval systems in place so far and simplify market access across the EU.

Until 31 December 2026, the European Commission will enforce the Directive on the basis of the Positive Lists composed by all national lists that were notified to ECHA in 2021. In the European Positive Lists, each entry has been assigned an expiry date, which marks the expiration of the permission to use the substance, composition or constituent (i.e. 31 December 2028, 2031, 2034 or 2037 as recommended by RAC depending on the hazard/risk profile). Each entry may furthermore specify conditions of use and concentration limits.

Also Note:

- IUCLID is a harmonised software co-developed by OECD and ECHA that will be used to receive the DWD notifications of intention and applications.
- Applications can only be submitted after a Notification of intention has been uploaded and both processes should be carried out by the same EU based legal entity.
- DWD Applications require to compile information on hazard, exposure and use and proper compilation in specific fields in IUCLID; this may require data- (and cost-) sharing and collaboration along the PVC value chain.
- Transition period: Starting substances which have been approved by a Member State between 13 July 2021 and 31 December 2026, in line with national provisions, may be used in the manufacture of materials or products that come into contact with drinking water until 31 December 2032 (watch the expiry date).

Find Out More:

- [European Positive Lists Implementing Decision \(EU COM\)](#)
- [DWD Guidance Documents \(ECHA\)](#)
- [Tools and Guidance to Prepare and Submit DWD Data \(ECHA\)](#)
- [Understanding the Drinking Water Directive \(ECHA\)](#)
- [European Positive Lists \(ECHA\)](#)

¹ The four lists include (i) organics, (ii) metallics, (iii) cementitious, and (iv) enamels, ceramics or other inorganics, respectively. Starting substances are typically organic materials, compositions are typically metallic and inorganic materials, and constituents are typically cementitious materials.

- [Implementing Decisions and Delegated Regulations under the Drinking Water Directive \(DG ENV\)](#)
- [Drinking Water \(DG ENV\)](#)

Some Questions Remain?

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- For information on implementation of Drinking Water Directive: caroline.braibant@plasticseurope.org