



PVC Industry Position on RoHS

Brussels, 08 June 2010

ENVI Committee's proposal for restrictions on PVC in EEE not backed by facts

The European PVC Industry views the recast of the RoHS Directive positively, sharing its objective to reduce environmental impacts of products placed on the European market.

However, our industry is extremely concerned by the ENVI Committee's proposal to include PVC in the Priority List for potential substitution in electric and electronic equipment (EEE) (Annex III).

We are very disappointed that, yet again, we face proposals without sound scientific basis, nor care for appropriate methodology.

In order to ensure decision-makers have all the facts, we draw attention to the following:

- The European Commission Green Paper¹ states, "*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*".
- The Green Paper on PVC was discussed in the European Parliament in April 2001. The Parliament called for the Commission to ensure the lifecycle impact on health and the environment for alternative products is assessed with at least the same degree of precision and objectivity as that used to assess PVC remains relevant.
- The *Life Cycle Assessment of PVC and of Principal Competing Materials* study², resulting from the Horizontal Initiative of the Commission on PVC, makes it clear there is no reason to discriminate against PVC in any application. The Horizontal Initiative on PVC (2000-2006) was focused on individual studies on end-of-life PVC, precisely the same issues now under consideration within the RoHS recast.

¹ For more information on the comprehensive investigation made by the European Commission on PVC issues in the period 2000-2006 (PVC Horizontal Initiative), please visit:
<http://ec.europa.eu/environment/waste/pvc/index.htm> and <http://ec.europa.eu/environment/waste/pvc/pdf/en.pdf>

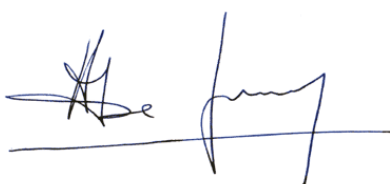
² See http://ec.europa.eu/enterprise/sectors/chemicals/files/sustdev/pvc-final_report_lca_en.pdf

- The PVC industry responded in a concerted and practical way to the various concerns raised within the Green Paper. Most significantly, the Voluntary Commitment of the PVC Industry, "Vinyl 2010", provides the most effective way of delivering real improvements faster than any other approach,. The PVC industry's response is effective and measurable, governed by review dates, commitments on consultation and external verification.
- The PVC producing and transforming industry in Western Europe comprises more than 21.000 companies with more than 530.000 jobs and a turnover of more than 72 billion €. At a time of uncertain economic growth, listing PVC in Annex III would result in market uncertainty and de-selection of PVC by downstream industries in sectors well beyond E&E, We are particularly concerned by the unintended consequences this would have. It would pose a serious threat to the industry in the EU, with serious potential impacts on both the chemical and E&E sectors.
- Calling now for the restriction of PVC is inconsistent with existing regulation and an example of scaremongering. This would not only have a significant and unjustified negative impact on the PVC industry but would also undermine REACH.
- PVC and PVC waste are not classified as hazardous and are fully suitable for recycling and recovery, as proven by Vinyl 2010. Since the beginning of the program in 2000, nearly 700.000 tons of post-consumer PVC waste have been safely recycled.
- In addition, E&E waste is also and more and more generated locally in developing countries. Open-burning does unfortunately exist but is not general practice. Our industry believes it should be strictly forbidden, with local laws strictly applied. PVC recyclers in developing countries have NO interest in open burning which results in lost income from plastic materials and has a very negative effect on the quality and value of metals (in particular copper) recovered. Introducing environmentally sound waste management practices is the ONLY way to prevent negative health and environmental issues in these countries.

We call on decision-makers to stick to sound science.



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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 100 % 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.

www.ecvm.org

Vinyl 2010 is the ten-year voluntary programme on Sustainable Development by the whole PVC industry. It has a concrete focus as set out in the European PVC Industry's Voluntary Commitment - a series of targets, projects, initiatives and research studies primarily concerning environmental protection and resource management.

www.vinyl2010.org

EuPC is the leading EU-level Trade Association, based in Brussels, representing European Plastics Converters. Its powerful European Plastics Network exists to support the beneficial use of plastics worldwide, especially providing plastics converting companies with a voice in European legislation. EuPC now totals about 51 European Plastics Converting national and European industry associations, it represents close to 50,000 companies, producing over 45 millions tonnes of plastic products every year.

www.plasticsconverters.eu