

Bonn, 22 November 2000

Federal Ministry for the Environment, Nature Conservation and Reactor Safety

Communication from the Federal Government to the German Members of the European Parliament

**Green Paper dated 26 July 2000 from the European Commission on the
"Environmental issues of PVC"**

Letter DG.ENV-E.3 AP/ap D (00) dated 17 August 2000 from the European Commission

Letter dated 29 August 2000 from the Federal Ministry for Financial Affairs

1. Background and objective

The European Commission had committed itself to assess the impact of PVC on the environment, including related human health issues, in an integrated approach. To this end, the Commission ordered five separate studies:

- "Chemical recycling of plastics waste (PVC and other resins)", December 1999, TNO (Netherlands);
- "Mechanical recycling of PVC wastes", January 2000, Prognos (Switzerland) in association with Plastic Consult (Italy) and COWI (Denmark);
- "The behaviour of PVC in landfill", February 2000, ARGUS (Germany) in association with the University of Rostock (Prof. Spillmann) and Sigma Plan S.A.;
- "The influence of PVC on the quantity and hazardousness of flue gas cleaning residues from incineration", April 2000, Bertin Tarnos (France) in association with VKI-Water Quality Institute (Denmark) and Forschungszentrum Karlsruhe (Germany);
- "Economic evaluation of PVC waste management", June 2000, AEA Technology (United Kingdom).

In view of the link with the contents of the Directive on end-of-life vehicles, the studies focused on waste management issues.

In July 2000 the Commission put the findings together in a Green Paper with two objectives:

"firstly, to present and assess on a scientific basis the various environmental issues including related human health aspects that occur during the life cycle of PVC and, secondly, to consider, in view of sustainable development, a number of options to reduce

those impacts that need to be addressed. This should serve as a basis for a consultation with stakeholders...."

The Federal Government and competent German authorities were not officially involved in drafting these documents. Nevertheless, the Commission staff responsible did refer to the publication by the German Umweltbundesamt entitled "Handlungsfelder und Kriterien für eine vorsorgende nachhaltige Stoffpolitik am Beispiel PVC" ("Fields of action and criteria for a sustainable, preventive materials policy, taking PVC as an example"), which is quoted on page 14 of the Green Paper. A reference is also made to the 1994 report by the Bundestag Commission of Inquiry ("Enquête Kommission").

The five studies, the Commission Green Paper and the opinions submitted can be found on the Internet site: http://www.europa.eu.int/comm/environment/waste/facts_en.htm.

2. The PVC industry in Germany

The preparations for a Community strategy on PVC are of particular interest to the Federal Government since the PVC industry plays an important part in the German economy.

PVC production and processing in Germany generate a turnover of around DEM 38 billion plus 170 000 jobs in more than 5000 firms. The PVC sector therefore accounts for approximately a quarter of the plastics industry. Germany is the largest single market for PVC in Western Europe.

According to estimates from the Association of European Plastic Converters (EuPC), in the European Union as a whole around 530 000 workers in some 21 000 firms generate a total turnover of DEM 140 billion.

3. Reports and communications from Germany

Germany has been working intensively on the issues raised in the Green Paper for many years. In particular, the following reports and communications have been published:

- November 1999 communication from the Federal Ministry for Education and Research on the promotion of research and development projects in the field of integrated environmental protection in the plastics and rubber industry;
- 1999 report from the Umweltbundesamt entitled "Handlungsfelder und Kriterien für eine vorsorgende nachhaltige Stoffpolitik am Beispiel PVC" ("Fields of action and criteria for a sustainable, preventive materials policy, taking PVC as an example");
- 1999 report from Prognos on PVC in selected production systems - a contribution to the discussion on sustainability;
- 1998 opinion of the committee of experts on environmental issues;

- 1997 report by the Working Party on PVC set up by the Federal/Land Task Force on Chemical Safety (BLAC);
- 1994 report by the Bundestag Commission of Inquiry ("Enquête Kommission") on "Protection of public health and the environment - Assessment criteria and perspectives on sustainable management of material streams in industrial society".

4. Assessment

The Federal Government welcomes the Commission's plan to take this Green Paper as the starting point for a public discussion marking the first step in a dialogue on sustainable development. The Federal Government shares the twin objectives of the Green Paper, as set out above.

The Green Paper discusses production of PVC and PVC compounds, the use of additives (stabilisers and plasticisers) and PVC waste management. Subject by subject, after a description of the current situation, the Commission then states its position and raises specific questions and issues for consideration.

In the case of PVC production and processing, clearly no need was seen to go beyond the measures adopted so far and the voluntary commitments given by the PVC industry itself.

The Commission recognises that the Green Paper draws no firm conclusions but sees it as a starting point for discussions which will serve as a basis for formulating a Community strategy at the start of 2001.

Nevertheless, the Federal Government points out that the Green Paper takes insufficient account of a number of important aspects. No analysis of the whole life cycle has yet been successfully completed, as outlined in, for example, the 1999 study by the Umweltbundesamt (see above).

However, the public hearing on 23 October 2000 plus the comments submitted by 31 November 2000 are expected to provide a sufficient basis for formulating a Community strategy.

The Commission should therefore work intensively on the following issues in particular:

- integrated analysis of the whole life cycle (instead of focusing on the waste segment);
- equal treatment of social, economic and environmental aspects;
- integrated assessment of recycling and disposal options;
- balanced assessment of alternative materials;
- taking account of ongoing risk assessment programmes on PVC additives;
- identification of the advantages and disadvantages of PVC in different uses;

- comprehensive assessment of PVC in relation to comparable plastics in different uses.

These points are touched on in Chapter 5 of the Green Paper, but only very briefly. The call in the Green Paper for a "comprehensive and objective assessment of the main environmental impacts both of PVC and of potential substitutes during their whole life cycle" is of overriding importance in the context of sustainability in particular.

Beyond that, health protection requirements must be taken into account and, where relevant, given greater weight in the assessment.

The Federal Government expects that, after assessment of the hearing and of the written comments due in by 30 November, these points will be taken into account in a communication from the Commission.