

European Commission
z.Hd. Herrn Schulte-Braucks
Head of chemical unit (DG ENTR)
1049 Bruxelles
Belgique

Liste der Fragen aus dem Grünbuch zur Umweltproblematik von PVC

Sehr geehrter Herr Schulte-Braucks,

Wir nehmen gern zu den acht Fragen wie folgt Stellung:

1. Stabilisatoren

Benecke-Kaliko AG verwendet seit ca 10 Jahren kein Blei und Cadmium mehr in ihren Produkten. Die Umsetzung der freiwilligen Selbstverpflichtung ist zu begrüßen.

2. Weichmacher

In unserem Hause erfolgt eine Umstellung der Rezepturen zur Eliminierung von DOP (DEHP) - WM. Wir verwenden Phthalat-Weichmacher teilweise in den Rezepturen. Wir verwenden ausschliesslich langkettige migrationsarme Phthalale, die eine Verbreitung in die Umwelt minimieren. Es gibt derzeit keinen gesicherten Nachweis, daß Phthalat-WM gesundheitsschädlich sind. Sollten jedoch, was wir nicht erwarten, Risiko-Minderungsmaßnahmen zu ergreifen sein, werden wir dies auf freiwilliger Basis umsetzen.

Unabhängig davon wird von uns der Einsatz alternativer Weichmacher geprüft.

3. Derzeitige Situation und zukünftige Entwicklung

PVC-Recycling wird in unserem Hause seit Jahren erfolgreich betrieben, einmal mit eigenen Produktionsabfällen, aber auch mit sortenreinen Abfällen unserer Kunden. Einschränkungen gibt es bei trägerhaltigen Materialien, wobei sich u.a. das Vinyloop-Verfahren anbietet, wenn es wirtschaftlich umgesetzt werden kann.

Ein Markieren von Fertigteilen, die durch den Teilehersteller aus mehreren Halbfertigwaren produziert werden, sollte für alle eingesetzten Materialien erfolgen. So ist eine sinnvolle Trennung der u. U. im Material unterschiedlicher Einzelkomponenten möglich und die Recyclingquote zu erhöhen.

Das PVC – Recycling kann jedoch noch verbessert werden. Der Kunde muß mit einbezogen werden und das Ziel sollte sein, ein gemeinsames Recycling-Konzept zu verabschieden, damit soviel Reste wie möglich in die Original- Produkte wiedereingesetzt werden. Hier sind in gleicher Weise auch die Zulieferer und Rohstoffhersteller gefordert. Einer gesetzlichen Regelung bedarf es nicht.

Unser Haus hat sich zur Aufgabe gemacht, keine Entwicklung neuer Produkte ohne schlüssiges Recycling-Konzept durchzuführen. Beim Recycling von trägerhaltigen Materialien stoßen wir allerdings noch auf Grenzen (technisch und wirtschaftlich).

Die Entwicklung recyclinggerechter Normen ist wünschenswert.

4. Werkstoffliches Recycling von blei- und cadmiumhaltigem PVC-Abfall

Siehe Antwort zu Frage 1

5. Chemisches Recycling

Das chemische Recycling befindet sich noch in der Entwicklung. Um die technischen und wirtschaftlichen Aspekte zu bewerten, benötigt es noch einer längeren Versuchsphase. Bestimmte Produkte bei uns sind Mehrstoffgemische, die gesondert untersucht werden müssten.

6. Verbrennung

Verbrennen favorisieren wir lediglich für trägerhaltige Materialien und Bauteile, bei denen ein Trennen zu energie- und kostenaufwendig ist. Das Verbrennen von PVC-haltigen Materialien wird derzeit in geeigneten Anlagen praktiziert und bedarf nach unserer Meinung keiner zusätzlichen Regelung.

Abfälle, die in Deutschland entstehen, sollten auch in Deutschland aufbereitet, in diesem Falle verbrannt werden. Man sollte sich aber auch klar zur Verbrennung bekennen, damit die ständige Diskussion über das Für und Wider beendet wird.

7. Deponierung

Unsere PVC-Abfälle, soweit sie nicht im eigenen Hause recycelbar sind, werden ausschließlich einer Verwertung zugeführt, d. h. nicht deponiert. Wir setzen ausschließlich migrationsarme Weichmacher und Additive ein. Dies wird auch im Rahmen unserer Umwelterklärung weiterhin durchgeführt und verbessert.

Falls Deponien allerdings ausreichend gesichert sind, sollte es für Deponierung keine Einschränkung geben.

8. Horizontale Strategie zu PVC

Durch stetige Weiterentwicklung der PVC – Rezepturen werden wir erreichen, PVC als ökologisch und ökonomisch sinnvollen Werkstoff weiterhin einzusetzen.

Für PVC spricht, dass PVC sowohl in der Produktion, in der Verarbeitung beim Kunden und in der Nutzung durch den Endverbraucher ein hervorragendes Eigenschaftsprofil liefert und es für uns unverständlich wäre, wenn es von Seiten der Kommission Einschränkungen geben sollte.

Mit freundlichem Gruss

Leitung Geschäftsbereich Kompaktfolie	Leiter Entwicklung Kompaktfolie	Leiter Entwicklung Möbelfolie	Leiter Entwicklung Slush	Leiter Bereich Recycling
Dr. Hans-Hinrich Kruse	Dr. U. Breuksch	Dr. R. Unvericht	Dr. K. Buchkremer	R. Vollmer

Message from Berhens

Sehr geehrter Herr Schulte-Braucks,
mit großem Interesse haben wir das von Ihnen unter
<http://www.europa.eu.int/comm/environment/pvc/index.htm>
ins Internet gestellte "Grünbuch zur Umweltproblematik von PVC" gelesen. Es ist
unser größtes Interesse, dass die PVC-Thematik in Ihren Gremien baldmöglichst
abschließend und in unserem Sinne positiv behandelt wird. Weitere Verzögerungen
werden sich negativ auf unseren Geschäftsbetrieb auswirken.
Im folgenden nehmen wir zu einzelnen Fragen des "Grünbuches" Stellung.
Grundsätzlich bevorzugen wir eine freiwillige Selbstverpflichtung vor gesetzlichen
Maßnahmen und wir sehen in der Freiwilligen Selbstverpflichtung der PVC-Branche
das geeignete Maßnahmenbündel für die zukunftsfähige nachhaltige Entwicklung des
Werkstoffes PVC.
Insbesondere zu Kapitel 4.2 "Werkstoffliches Recycling", Frage Nr. 3 möchten wir
Stellung nehmen.

Frage Nr. 3 "Mit welchem Maßnahmenkatalog ließe sich das Ziel einer stärkeren
Nutzung des PVC-Recycling am effektivsten erreichen?"

Wir nehmen mit großem Interesse die Recycling-Ziele der PVC-Branche zur Kenntnis
- zumal diese auch unserer ökologischen Überzeugung entsprechen.

Daher befürworten wir auch in diesem Punkt die "Freiwillige Selbstverpflichtung"
und unterstützen die Recyclingziele des Grünbuchs sowie die unter Punkt 2.3 der
Freiwilligen Selbstverpflichtung genannten Zielquoten: 25 Prozent für das Jahr 2003
und 50 Prozent für 2005 - basierend auf der erfassten, verfügbaren Alt(PVC-)
Kunststoffmenge.

Wie im Falle der Verwertung unserer Profil-Abschnitte werden wir auch in Zukunft
unseren Teil zur Realisierung der o.g. Ziele beitragen. Die guten Erfahrungen unserer
Branche im Rahmen der F.R.E.I. - Fenster-Recycling-Initiative in Deutschland lassen
uns von der Zielerreichung überzeugt sein.

Im Falle der Fragen 5, 6 und 7 des "Grünbuches"

Frage 5: "Welcher Katalog von Maßnahmen wäre am geeignetsten für das chemische
Recycling von PVC-Abfall?"

Frage 6: " Welcher Maßnahmenkatalog würde die mit der Verbrennung von PVC-
Abfall zusammenhängenden Probleme am effektivsten ausräumen?"

Frage Nr. 7: "Sind mit Blick auf die Deponierung von PVC-Abfällen spezielle
Maßnahmen erforderlich? Wenn ja, welche?"

sehen wir für unsere Produkte keinen weiteren Handlungsbedarf. Darüber hinaus
möchten wir zu Frage 7 betonen, dass aus deponierten Fensterprofilen keine
gefährlichen Sickerwässer austreten. Unsere Stellungnahme zu Frage 8: "Welches sind
die geeigneten Instrumente zur Entwicklung einer horizontalen Strategie zu PVC?
Sollte für einige Produkte eine PVC-Substitutionspolitik gefasst werden? Wenn ja,
wie?"

Unserer Auffassung nach ist die Freiwillige Selbstverpflichtung der PVC-Branche die
geeignete horizontale Strategie zum verantwortungsvollen Umgang mit dem
Werkstoff PVC für die kommenden Jahrzehnte. Wir sehen keine Notwendigkeit und
keinen Nutzen für die Entwicklung einer weiteren Strategie.

Rahmenmaterialien aus PVC mit dem anerkannt günstigen Preis/Leistungsverhältnis
nehmen einen Spitzenplatz unter den verfügbaren Rahmenmaterialien ein. Das

belegen unabhängige Ökobilanzen über Fensterrahmen-Materialien und die Erkenntnisse zur Verbesserung der Öko-Effizienz.

Eine Substitutionspolitik, das heißt eine Strategie zum Ersatz von PVC, ist deshalb verfehlt und führt zu ökologischer und ökonomischer Verschlechterung der Allgemeinsituation in Europa.

Abschließend möchten wir Sie auffordern, die PVC-Horizontalanalyse zu einem baldigen Abschluss im Sinne der Freiwilligen Selbstverpflichtung der PVC-Branche zu bringen. Dies erscheint uns sowohl aus wissenschaftlichen Erwägungen heraus als auch aus den wirtschaftlichen Belangen unseres Betriebes dringend geboten.

Mit freundlichen Grüßen

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Message from Bert Rabbe

Since the European Community's Green Paper could form the basis for European Union's regulation of PVC, I am pleased to be invited to comment on aspects of it. I am an employee of Occidental Chemical Corporation, a manufacturer of PVC resin in North America and I am concerned about the impact EU action might have on international trade, my company's business, our customers' business and my own job.

Any legislation regarding one single material is inappropriate without having equally analysed its alternatives. Such a comparison has to consider the whole life cycle of each specific application and not just end-of-life aspects. I look forward to the set of horizontal studies that must be done on every other material before such life cycle comparisons can rationally be made.

As a serious step forward on the track to sustainability, the PVC Industry has offered a Voluntary Commitment for improvement in many of the areas addressed by the Green Paper. It provides an opportunity to demonstrate good product stewardship by continuously improving manufacturing processes, addressing additives issues, increasing recycling and setting up a financial scheme to achieve the targets.

Voluntary action by companies is a progressive way of accomplishing environmental goals in cooperation with government. It should be the preferred EU policy.

Thank you,
Bert Rabbe

Message from Bertrix Cyrille

Je voudrais juste attirer votre attention sur l'utilisation du PVC dans le domaine médical. Il est choisi dans les hôpitaux car il résiste aux moisissures et il peut donc subir des lavages fréquents avec des détergents puissants. Dans certains hôpitaux il remplace les moquettes. Il est plus facile d'entretien et n'est pas " un nid " à microbes.

Je sais que pour l'instant on ne lui a pas trouvé de remplaçant pour conserver le sang

Message from Bill Lind

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Thank you,
Bill Lind

Message from Bill Ravanese

Congratulations on your Green Paper on PVC Waste (Waste Analysis) which effectively highlights all the problems of trying to manage PVC...from incineration to landfills. And, for realistically examining the problems with recycling PVC.

Bill Ravanese MA MPH
Adjunct Instructor
Boston University School of Public Health

Message from bill Roswell

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Thank you,

Message from Billy Jonhson

Thank you very much for the opportunity to comment on the European Community's Green Paper on PVC. As an employee of Occidental Chemical Corporation, a manufacturer of PVC resin in North America, I am concerned about the potential impact of the European Union's actions on international trade, my company's business, our customers' business and my own job.

European plastics waste management policy should include all the options: landfill, recycling and incineration. Sometimes separation of plastic applications is not possible or cost-effective. In this case, incineration recovers the energy content of plastic materials.

Each material has its own incineration cost. Even though the neutralization residues' disposal costs appear to be significant for PVC, PVC emits less CO₂ when combusted. Total life cycle costs may be comparable to those of other materials. Before deciding to divert one material from incineration, all material specific costs--operating and environmental--have to be taken into account. Moreover, new technologies allow minimization and/or recycling of neutralization residues. The European PVC Industry has committed to research such technologies.

The European Union's Green Paper rightly notes that research and regulation the world over shows that design and operation of incinerators is the most important consideration for dioxin minimization. Chlorine/PVC content is, at most, a minor contributor.

PVC is a modern material yet it has significant history. Resin, additive and product technology is improving continuously; however, the long track record of safety and utility of vinyl should not be ignored. The European industry, through its voluntary commitment is working to address the substantive issues outlined in the Green Paper. This is a progressive approach to environmental concerns, and should be the basis for European policy on PVC.

Thank you,
Billy Johnson

Message from Bob Akers

Thank you very much for the opportunity to comment on the European Community's Green Paper on PVC. I am an employee of Occidental Chemical Corporation, A North American manufacturer of PVC resin. Since it could form the basis for European Union's regulation of PVC, I am concerned about the potential impact the Green Paper might have on international trade, my company's business, our customers' business and my own job.

I am particularly concerned about the study conducted on landfilling of PVC. The European PVC Industry challenges the conclusions of the EU study, as well they should. The extreme temperature used to accelerate aging of materials in the study undoubtedly affected the results. Other independent studies closer to real landfill conditions have concluded that PVC in landfill, including plasticized applications, is environmentally safe.

There is enough scientific research available on this topic. PVC can be safely landfilled, and no specific regulatory measures should be considered at present.

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Thank you,
Bob Akers

Message from Brenda Gheran

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Common short-life applications such as bottles and plastic containers are the most frequently recycled items; PVC is unfortunately less commonly used in those items than other plastics. Consequently, the greatest investment in recycling infrastructure goes to increase the recycling rates of packaging as a whole, and thus mainly the recycling of materials other than PVC.

As a material predominantly used in long-life applications, PVC will have special recycling challenges. Whether these challenges mean that PVC will have a significantly lower recycling rate than other products-when all end-use applications are considered--is not apparent from the horizontal studies.

New recycling technologies have been commercialized recently by individual companies as part of the industry's voluntary approach to PVC policy. They will increase the potential for recycling. Voluntary action is a progressive way to solve modern problems of modern materials like PVC. It can take into account the different ways in which materials are used in different European countries and still accomplish recycling goals. Industry's voluntary approach should form the basis for European Union's policy on PVC.

Thank you,
Brenda Gheran

Message from Brian Claassen

Thank you very much for the opportunity to comment on the European Community's Green Paper on PVC. I am an employee of Occidental Services Incorporated, a manufacturer of PVC resin in North America, and I am concerned about the potential impact of the European Union's actions on international trade, my company's business and my job.

Chemical recycling is a new technology, still under development that is complementary to mechanical recycling. Even though it is most economically viable with pure streams, it has the potential to treat non-sortable and/or contaminated waste, including PVC. The European PVC Industry has committed to explore this recycling route, in order to identify the most appropriate technology by 2002. Scale-up and application to real waste will follow, pursuant to the Voluntary Commitment.

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Thank you,

Message from Brian Hart

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Thank you,
Brian Hart

Message from Brian Sparks

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Thank you,
Brian Sparks

Message from Bryan McDowell

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Thank you,
Bryan McDowell

Message from Byron McWhirter :

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Thank you,
Byron McWhirter

Message from Carlo Avanzini

Mi chiamo Carlo Avanzini, sono Direttore Generale della Padanaplast S.p.A. di Roccabianca (PR) attiva nella produzione di compounds reticolabili con sistema silanico e compounds antifiama, utilizzati rispettivamente nel settore dei tubi per idrotermosanitario e dei cavi elettrici, telefonici ecc..

La nostra azienda è certificata ISO 9001, il fatturato è di circa 70 miliardi di lire ed esporta l'80% della sua produzione, con 74 addetti. Pur essendo noi produttori di materiali abbastanza innovativi, non posso rimanere indifferente alle preoccupazioni e perplessità contenute nel libro verde tendente a formulare un vero e proprio processo al PVC.

Nella mia lunga attività nel settore delle materie plastiche, prima in Montecatini e poi qui in Padanaplast, ho lavorato prevalentemente nel PVC e quindi mi posso permettere di esprimere alcuni aspetti positivi di questo tipo di polimero. Il PVC si è imposto sul mercato della materie plastiche negli anni 40, all' inizio degli anni 60 sono iniziati i primi commenti negativi nei confronti di questo materiale, in crescendo, come del resto dimostra quest'ultima posizione espressa nel cosiddetto "Libro Verde"; l'accanimento denigratorio nei confronti del PVC è veramente esasperato e spesso dettato dall' incompetenza.

Allo scopo di non scendere in troppi particolari che singolarmente presi potrebbero sembrare irrilevanti. La mia opinione sul PVC parte dal fondo: è materialmente impossibile eliminarlo ed assurdo pensarne la completa sostituzione.

La prima analisi va fatta sui costi, la seconda nella semplice processabilità del prodotto.

Alla luce di queste mie sintetiche considerazioni ritengo fuori luogo le preoccupazioni sollevate dal Libro Verde anche in considerazione dell' impegno serio e competente dimostrato dall'industria che opera in questo settore.

Ritengo inoltre non esistono assolutamente rischi gravi nell'uso di manufatti in PVC, sarebbe invece auspicabile ed opportuno pretendere il rispetto e l'esatta applicazione delle normative previste per il recupero e riciclaggio del PVC, spesso affidato a persone ed aziende senza scrupoli e professionalità.

Carlo Avanzini
PADANAPLAST S.p.A.

Message from Charles A. Budnik

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Thank you,
Charles A. Budnik Jr.

Message from Charles Clark

I am an employee of Occidental Chemical Corporation , a manufacturer of PVC resin in North America, and I am concerned about the potential impact of European Union's actions on international trade, my company's business and my job. I am also grateful for the opportunity to comment on the European Commission Green Paper.

As you know, lead stabilizers are less frequently used in the US than they are in Europe. I understand that all available information demonstrates that the use of lead stabilizers in PVC applications is not hazardous, particularly in electrical applications as in the US.

On the other hand, a proper scientific risk assessment-- to which the European industry would contribute-- will be carried out and the results made available. This should demonstrate that no legislative measures are needed and that the industry's Voluntary Approach is the most appropriate option.

The use of lead stabilizer in Europe will decline as a result of these voluntary measures. Annual consumption of lead stabilizers and their uses will be monitored and published. Actions will only have to be taken if the PVC Industry fails to achieve its forecast decline in use.

PVC is a modern material. Resin, additive and product technology is improving continuously. Fabrication companies are also investing in the exploration of potential alternatives, as has always been done for any material; however, alternatives should be favored only if a complete comparative analysis demonstrates that they are better than PVC. More generally, the European industry, through its voluntary commitment is working to address the substantive issues outlined in the Green Paper. This is a progressive approach to environmental concerns, and should be the basis for European policy on PVC.

Thank you,
Charles Clark

Message from Chris Burrell

Thank you very much for the opportunity to comment on the European Community's Green Paper on PVC. As an employee of OxyVinyls, LP, a manufacturer of PVC resin in North America, I am concerned about the potential impact of the European Union's actions on international trade, my company's business, our customers' business and my own job.

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Thank you,
Chris Burrell

Message from Chris Padgett :

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As a material predominantly used in long-life applications, PVC will have special recycling challenges. Whether these challenges mean that PVC will have a significantly lower recycling rate than other products-when all end-use applications are considered--is not apparent from the horizontal studies.

New recycling technologies have been commercialized recently by individual companies as part of the industry's voluntary approach to PVC policy. They will increase the potential for recycling. Voluntary action is a progressive way to solve modern problems of modern materials like PVC. It can take into account the different ways in which materials are used in different European countries and still accomplish recycling goals. Industry's voluntary approach should form the basis for European Union's policy on PVC.

Thank you,
Chris Padgett

Message from Christophe Terrier

Je voudrais apporter un témoignage personnel en faveur du PVC. J'ai fait refaire les fenêtres et les portes de ma maison en PVC il y a plusieurs années. Depuis, l'isolation thermique de ma maison est bien meilleure, et je réalise chaque année des économies non négligeables sur ma facture de fuel (économie d'énergie). Autre point important pour moi : je n'ai eu à faire aucun travaux d'entretien sur mes portes et fenêtres tout au long de ces années. Cela veut dire notamment pas de travaux de peinture, pas de décapage, donc pour moi un gain de temps, et sûrement en final... un bon point pour l'environnement.

Message from Claude Langelade :

Je voudrais apporter un temoignage personnel en faveur du PVC.

J'ai fait refaire les fenêtres de ma maison en PVC. Depuis l'isolation thermique et phonique de ma maison est bien meilleure, et je fais des économies d'énergie, visibles sur mes factures de fuel.

D'autre part l'entretien de mes fenêtres est réduit au minimum, pas de décapage ou de peinture, encore un bon point pour le PVC vis à vis de l'environnement.

C.L.

Message from Curtis Bates

Since the European Community's Green Paper could form the basis for European Union's regulation of PVC, I am pleased to be invited to comment on aspects of it. I am an employee of Occidental Chemical Corporation, a manufacturer of PVC resin in North America and I am concerned about the impact EU action might have on international trade, my company's business, our customers' business and my own job.

Any legislation regarding one single material is inappropriate without having equally analysed its alternatives. Such a comparison has to consider the whole life cycle of each specific application and not just end-of-life aspects. I look forward to the set of horizontal studies that must be done on every other material before such life cycle comparisons can rationally be made.

As a serious step forward on the track to sustainability, the PVC Industry has offered a Voluntary Commitment for improvement in many of the areas addressed by the Green Paper. It provides an opportunity to demonstrate good product stewardship by continuously improving manufacturing processes, addressing additives issues, increasing recycling and setting up a financial scheme to achieve the targets.

Voluntary action by companies is a progressive way of accomplishing environmental goals in cooperation with government. It should be the preferred EU policy.

Thank you,

Message from Curtis Cranmer

I am an employee of Occidental Chemical Corporation , a manufacturer of PVC resin in North America, and I am concerned about the potential impact of the European Union's actions on international trade, my company's business, our customers' business and my job. I am also grateful for the opportunity to comment on the European Commission Green Paper.

No specific regulatory measures are necessary with respect to mechanical recycling of lead- and cadmium-containing PVC waste. If such material is to be recycled, a closed loop system--that is, recycling articles into similar articles--should take priority. Heavy metals in PVC applications are integrated in the plastic matrix, and present no unusual risk.

PVC is a modern material. Resin, additive and product technology is improving continuously. Fabrication companies are also investing in the exploration of potential alternatives, as has always been done for any material; however, alternatives should be favored only if a complete comparative analysis demonstrates that they are better than PVC. More generally, the European industry, through its Voluntary Commitment is working to address the substantive issues outlined in the Green Paper. This is a progressive approach to environmental concerns, and should be the basis for European policy on PVC.

Thank you,

Message from Dalton Taylor

Thank you very much for the opportunity to comment on the European Community's Green Paper on PVC. I am an employee of Occidental Chemical Corporation, a manufacturer of PVC resin in North America, and I am concerned about the potential impact of European Union's actions on international trade, my company's business and my job.

I would particularly like to comment on the questions regarding cadmium stabilizers. The PVC Industry, and especially the European stabilizer producers (ESPA), has committed to stop marketing and selling cadmium stabilizers in Europe, within a period of one year. Its members have recommended that all converters stop using cadmium stabilizers from March 2001 onwards. If cadmium stabilizers present an environmental issue, which has not been demonstrated, this will address it over the coming years.

PVC is a modern material. Resin, additive and product technology is improving continuously. The European industry, through its voluntary commitment is working to address the substantive issues outlined in the Green Paper. This is a progressive approach to environmental concerns, and should be the basis for European policy on PVC.

Thank you,
Dalton Taylor

Message from Dan Keiser

Thank you very much for the opportunity to comment on the European Community's Green Paper on PVC. As an employee of OxyVinyls, LP, a manufacturer of PVC resin in North America, I am concerned about the potential impact of the European Union's actions on international trade, my company's business, our customers' business and my own job.

European plastics waste management policy should include all the options: landfill, recycling and incineration. Sometimes separation of plastic applications is not possible or cost-effective. In this case, incineration recovers the energy content of plastic materials.

Each material has its own incineration cost. Even though the neutralization residues' disposal costs appear to be significant for PVC, PVC emits less CO₂ when combusted. Total life cycle costs may be comparable to those of other materials. Before deciding to divert one material from incineration, all material specific costs--operating and environmental--have to be taken into account. Moreover, new technologies allow minimization and/or recycling of neutralization residues. The European PVC Industry has committed to research such technologies.

The European Union's Green Paper rightly notes that research and regulation the world over shows that design and operation of incinerators is the most important consideration for dioxin minimization. Chlorine/PVC content is, at most, a minor contributor.

PVC is a modern material yet it has significant history. Resin, additive and product technology is improving continuously; however, the long track record of safety and utility of vinyl should not be ignored. The European industry, through its voluntary commitment is working to address the substantive issues outlined in the Green Paper. This is a progressive approach to environmental concerns, and should be the basis for European policy on PVC.

Thank you,
Dan Keiser

MESSAGE FROM DANIEL W. WHITE

Thank you very much for the opportunity to comment on the European Community's Green Paper on PVC. I am an employee of OxyVinyls, LP , a manufacturer of PVC resin in North America, and I am concerned about the potential impact of the European Union's actions on international trade, my company's business and my job.

Chemical recycling is a new technology, still under development that is complementary to mechanical recycling. Even though it is most economically viable with pure streams, it has the potential to treat non-sortable and/or contaminated waste, including PVC. The European PVC Industry has committed to explore this recycling route, in order to identify the most appropriate technology by 2002. Scale-up and application to real waste will follow, pursuant to the Voluntary Commitment.

PVC is a modern material. Resin, additive and product technology is improving continuously. The European industry, through its voluntary commitment is working to address the substantive issues outlined in the Green Paper. This is a progressive approach to environmental concerns, and should be the basis for European policy on PVC.

Thank you,
Daniel W. White

Message from David Manning

Thank you very much for the opportunity to comment on the European Community's Green Paper on PVC. Since it could form the basis for European Union's regulation of PVC, I am concerned about the impact the Green Paper might have on international trade, my company's business, our customers' business and my own job.

My company, Occidental Chemical Corporation, a manufacturer of PVC resin is well aware of the opportunities and costs associated with mechanical recycling. I believe the European PVC Industry is correct to favor end-use specific, not material specific, recycling targets. As with any other material, PVC has to do its part--no more and no less--to achieve agreed upon targets. Setting targets and organizing recycling by end-use application is the most rational and cost effective approach.

Mechanical recycling is appealing and can make a significant positive environmental contribution; however, to be viable economically candidates for recycling must be easily collected and sorted. They must be available in significant quantities and require minimum transportation. These needs apply to all plastics, and in fact, all materials.

Responsibility for satisfying these conditions can be shared by industry and government. For PVC window frames and pipes, voluntary commitments have been made by the European industry to recycle returned material. For other applications, work is ongoing to make similar voluntary take-back approaches feasible.

New recycling technology has been commercialized recently by individual companies and industry associations as part of the industry's voluntary approach. Voluntary action is a progressive way to solve modern problems of modern materials like PVC. It should form the basis for European Union's action.

Thank you,
David Manning

Message from David Murawa

Thank you very much for the opportunity to comment on the European Community's Green Paper on PVC. Since it could form the basis for European Union's regulation of PVC, I am concerned about the impact the Green Paper might have on international trade, my company's business, our customers' business and my own job.

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Thank you,
david murawa

Message from David Pasciak

Thank you very much for the opportunity to comment on the European Community's Green Paper on PVC. I am an employee of Occidental Petroleum Corporation, A North American manufacturer of PVC resin. Since it could form the basis for European Union's regulation of PVC, I am concerned about the potential impact the Green Paper might have on international trade, my company's business, our customers' business and my own job.

I am particularly concerned about the study conducted on landfilling of PVC. The European PVC Industry challenges the conclusions of the EU study, as well they should. The extreme temperature used to accelerate aging of materials in the study undoubtedly affected the results. Other independent studies closer to real landfill conditions have concluded that PVC in landfill, including plasticized applications, is environmentally safe.

There is enough scientific research available on this topic. PVC can be safely landfilled, and no specific regulatory measures should be considered at present.

PVC is a modern material yet it has significant history. The European industry, through its Voluntary Commitment is working to address the substantive issues outlined in the Green Paper. This is a progressive approach to environmental concerns, and should be the basis for European policy on PVC.

Thank you,
David Pasciak

Message from David R. Hill

Thank you very much for the opportunity to comment on the European Community's Green Paper on PVC. Since it could form the basis for European Union's regulation of PVC, I am concerned about the impact the Green Paper might have on international trade, my company's business, our customers' business and my own job.

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Thank you,

Message from David Rivas

Thank you very much for the opportunity to comment on the European Community's Green Paper on PVC. I am an employee of Occidental Chemical Corporation, a manufacturer of PVC resin in North America, and I am concerned about the potential impact of the European Union's actions on international trade, my company's business and my job.

Chemical recycling is a new technology, still under development that is complementary to mechanical recycling. Even though it is most economically viable with pure streams, it has the potential to treat non-sortable and/or contaminated waste, including PVC. The European PVC Industry has committed to explore this recycling route, in order to identify the most appropriate technology by 2002. Scale-up and application to real waste will follow, pursuant to the Voluntary Commitment.

PVC is a modern material. Resin, additive and product technology is improving continuously. The European industry, through its voluntary commitment is working to address the substantive issues outlined in the Green Paper. This is a progressive approach to environmental concerns, and should be the basis for European policy on PVC.

Thank you,

Message from David Hurter :

Since the European Community's Green Paper could form the basis for European Union's regulation of PVC, I am pleased to be invited to comment on aspects of it. I am an employee of Occidental Chemical Corporation , a manufacturer of PVC resin in North America and I am concerned about the impact EU action might have on international trade, my company's business, our customers' business and my own job.

Any legislation regarding one single material is inappropriate without having equally analysed its alternatives. Such a comparison has to consider the whole life cycle of each specific application and not just end-of-life aspects. I look forward to the set of horizontal studies that must be done on every other material before such life cycle comparisons can rationally be made.

As a serious step forward on the track to sustainability, the PVC Industry has offered a Voluntary Commitment for improvement in many of the areas addressed by the Green Paper. It provides an opportunity to demonstrate good product stewardship by continuously improving manufacturing processes, addressing additives issues, increasing recycling and setting up a financial scheme to achieve the targets.

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Thank you,
David R. Hurter

Message from Dianre Larson

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Thank you,

Message from Dick Dibble

Thank you very much for the opportunity to comment on the European Community's Green Paper on PVC. As an employee of Occidental Chemical Corporation, a manufacturer of PVC resin in North America, I am concerned about the potential impact of the European Union's actions on international trade, my company's business, our customers' business and my own job.

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PVC is a modern material yet it has significant history. Resin, additive and product technology is improving continuously; however, the long track record of safety and utility of vinyl should not be ignored. The European industry, through its voluntary commitment is working to address the substantive issues outlined in the Green Paper. This is a progressive approach to environmental concerns, and should be the basis for European policy on PVC.

Thank you,
Roderick A Dibble

Message from Dominique Basson :

Le PVC : un matériau noble !

Je voudrais témoigner en faveur du PVC.

Je travaille dans une usine de production de PCV depuis 23 ans. Pendant 15 ans, j'ai été en contact direct avec ce produit, sur les chaînes de fabrication pendant 3 ans, puis en laboratoire de contrôle et de perfectionnement pendant 12 ans.

Je travaille actuellement dans une unité de production de chlore.

J'ai pu, au travers de mon expérience professionnelle et dans la vie de tous les jours, mesurer les progrès considérables accomplis en matière d'environnement et au niveau de la qualité et de la fiabilité du PVC, de sa facilité de mise en oeuvre, des avantages de son utilisation.

Ayant fait construire un pavillon il y a 16 ans, je regrette d'avoir fait poser des huisseries en bois, avec tout l'entretien que cela génère (utilisation de produits certainement nocifs), alors que j'aurais dû choisir le PVC, qui lui est pratiquement sans entretien, bon isolant, durable. Si je dois un jour changer, j'opterai, à coup sûr, pour le PVC.

Message from Don Haas

Thank you very much for the opportunity to comment on the European Community's Green Paper on PVC. Since it could form the basis for European Union's regulation of PVC, I am concerned about the impact the Green Paper might have on international trade, my company's business, our customers' business and my own job.

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Thank you,
Don Haas

Message from Don L. Moore

Thank you very much for the opportunity to comment on the European Community's Green Paper on PVC. I am an employee of Occidental Petroleum Corporation, a manufacturer of PVC resin in North America, and I am concerned about the potential impact of the European Union's actions on international trade, my company's business and my job.

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Message from Don Piekarski

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Thank you,

Message from Don Stephens

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As a material predominantly used in long-life applications, PVC will have special recycling challenges. Whether these challenges mean that PVC will have a significantly lower recycling rate than other products--when all end-use applications are considered--is not apparent from the horizontal studies.

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Message from Donald Taylor

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Voluntary action by companies is a progressive way of accomplishing environmental goals in cooperation with government. It should be the preferred EU policy.

Thank you,
Donald L. Taylor

Message from DONATELLA PELLINI

SINCERAMENTE NON RIESCO A CAPIRE L'ACCANIMENTO DI TANTA PARTE DELLE ASSOCIAZIONE

AMBIENTALISTE E DEL GROSSO PUBBLICO CONTRO IL PVC E TUTTO QUELLO CHE NON E'"NATURALE" IN GENERE. PENSO CHE TUTTI VORREMMO VIVERE IN UN MONDO SENZA FAME, GUERRE, PESTICIDI, INQUINAMENTO, SOVRAFFOLLAMENTO ECC., INSOMMA IN PARADISO E PROBABILMENTE LO POTREMMO FARE SE AL MONDO ESISTESSERO SOLO 500 MILIONI DI PERSONE E DAL CIELO SCENDESSE LA MANNA !

DATO CHE PERO' DOBBIAMO VIVERE NEL MONDO IMPERFETTO DI OGGI PENSO CHE LA COSA MIGLIORE DA FARE E' IMPEGNARE TUTTE LE RISORSE POSSIBILI NELLO STUDIARE IL MODO MIGLIORE DI RICICLARE E/O RENDERE "INOFFENSIVI" TUTTI QUEI MATERIALI POTENZIALMENTE DANNOSI.

SALUTI.

Message from Donna Abatte

Thank you very much for the opportunity to comment on the European Community's Green Paper on PVC. I am an employee of Occidental Chemical Corporation, a manufacturer of PVC resin in North America, and I am concerned about the potential impact of European Union's actions on international trade, my company's business and my job.

I would particularly like to comment on the questions regarding cadmium stabilizers. The PVC Industry, and especially the European stabilizer producers (ESPA), has committed to stop marketing and selling cadmium stabilizers in Europe, within a period of one year. Its members have recommended that all converters stop using cadmium stabilizers from March 2001 onwards. If cadmium stabilizers present an environmental issue, which has not been demonstrated, this will address it over the coming years.

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Thank you,
Donna M. Abatte

Message from Douglas Kistler

Since the European Community's Green Paper could form the basis for European Union's regulation of PVC, I am pleased to be invited to comment on aspects of it. I am an employee of Occidental Chemical Corporation, a manufacturer of PVC resin in North America and I am concerned about the impact EU action might have on international trade, my company's business, our customers' business and my own job.

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Voluntary action by companies is a progressive way of accomplishing environmental goals in cooperation with government. It should be the preferred EU policy.

Thank you,
Douglas Kistler