

Message from CHENE Jean-Paul

PVC LE LIVRE VERT

Cher Monsieur SCHULTE-BRAUCKS,

Je suis employé de la société ATOFINA située à Saint-Fons et active dans l'industrie Chimique production PVC et me sens très concerné par le livre vert de la commission. J'ai étudié attentivement les points, pour et contre de ce document, ainsi que ceux explicités dans l'Engagement Volontaire des producteurs de PVC.

Je souhaite faire les commentaires suivants :

⇒ Le PVC est un des matériaux synthétiques les plus modernes.

⇒

Il offre une valeur ajoutée importante à la société, par ses nombreuses applications telles que : équipement médical, emballage pharmaceutique, revêtement de sol pour la maison et l'hôpital, des châssis de fenêtres sans entretien, de bonne performance énergétique, des tubes de distribution d'eau assurant leur fonction pendant 100 ans etc...

⇒ Notre société fabrique des compositions vinyliques prêtes à l'emploi ; nos produits sont reconnus comme sûrs dans leurs applications.

⇒ Je sais que d'autres matériaux plastiques, ou naturels peuvent être utilisés dans certaines applications mais ceux-ci sont souvent moins efficaces en terme économique et/ou écologique que le PVC.

⇒ Des progrès énormes ont été réalisés dans nos usines pour réduire l'impact de nos rejets sur l'environnement.

⇒ Quel que soit le matériau considéré, les produits après leur première vie, deviennent déchets. Le recyclage du PVC progresse dans tous les pays d'Europe, et de nouvelles technologies sont en cours d'expérimentation : ceci permettra aux générations futures de traiter convenablement les produits PVC en fin de vie.

⇒ De nombreuses questions évoquées dans le Livre Vert s'appliquent à tous les matériaux et pas seulement au PVC. C'est pourquoi je ne comprends pas que la Commission insiste tant sur le PVC, en particulier.

⇒ L'importance de l'industrie du PVC, y compris les petites et moyennes industries transformatrices, est considérable en Europe.

C'est pourquoi je soutiens l'Engagement Volontaire de l'industrie de PVC qui nous a été présenté dans nos usines.

En conclusion je recommande à la Commission de retenir les propositions de l'Engagement Volontaire : ce dernier permet l'approche la plus efficace pour améliorer la situation écologique et économique du PVC.

Je souhaite que le PVC soit traité comme tout autre matériau synthétique ou naturel.

CHENE Jean-Paul

Message from Jean Pascal Valentin :

Monsieur,

Pour moi, utiliser du PVC c'est aller dans le sens de l'économie des ressources non renouvelables. En effet, contrairement à d'autres plastiques, dérivés à 100% du pétrole, il ne demande pour sa fabrication que 43% de pétrole, auxquels on ajoute 57% de sel, une matière première qui n'est pas prête de connaître la pénurie. J'ai lu que les réserves mondiales de sel gemme étaient de l'ordre de 37 000 000 milliards de tonnes ! Ne serait-ce que pour cette raison, je trouve qu'il faut conserver le PVC. Les problèmes actuels sur les coûts du pétrole parlent en faveur du maintien de ce plastique.

Jean Pascal VALENTIN

Message from Jean-Paul. LECA :

Mantes la Jolie, le 08 octobre 2000

À l'attention de :

M. Schulte-Braucks Head of the chemicals unit (DG ENTR)

M. Krämer Head of the waste management unit (DG ENV)

Objet : GREEN PAPER on Environmental issues of PVC - COM (2000)469

Monsieur le Directeur,

Permettez-moi tout d'abord de féliciter la Commission pour l'initiative qu'elle vient de prendre. Ouvrir un débat public sur le PVC et l'environnement devrait enfin permettre de rectifier officiellement les contre-vérités et clore ainsi toutes les polémiques stériles. En ma qualité de citoyen, de scientifique, mais également de consommateur et de contribuable, je désire participer à ce débat public.

Diplômé de l'Université de Paris (Doctorat Chimie Physique 1971, thèse au Laboratoire CNRS de A. Chapiro sur le " Greffage Radiochimique du Polyéthylène ") je travaille depuis cette date dans l'industrie des matières plastiques.

J'ai successivement abordé des activités de Recherches, d'Assistance Technique, de Développement, de Management et d'Expertise. En particulier j'ai eu la chance de "rencontrer " le PVC de 1976 à 1979 et de participer au développement en France de diverses applications du PVC, en particulier dans l'électricité (la câblerie) et le bâtiment (tubes et profilés pour fenêtres).

Tout au long de cette carrière, j'ai pu constater qu'en raison de sa jeunesse, l'industrie des matières plastiques, incluant le PVC, est une industrie moderne, dynamique dans son évolution, respectueuse de toutes les législations, grâce aux hommes qui l'animent avec compétence, expérience et responsabilité.

La matière plastique PVC en elle-même est inerte et intrinsèquement inoffensive pour l'Homme (voir la fiche de donnée de sécurité du PVC, conforme à la Directive 93/112/CEE, qui le mentionne). Par opposition à d'autres matériaux putrescibles, comme le bois ou le papier carton par exemple, elle est durablement stable dans le temps ; c'est un avantage pour les applications du bâtiment en particulier, c'est aussi un avantage lorsque faute d'autres meilleures solutions certains objets PVC en fin de vie sont stockés en décharges (de ce fait pas de relargage pas vers l'environnement).

Le PVC qui est inerte et inoffensif est de plus un matériau très bon marché car il provient à 57 % du sel de la mer qui est inépuisable et à 43 % seulement du pétrole.

Il est l'ami de l'environnement car les progrès technologiques réalisés pour sa fabrication, sa transformation et son élimination ont été considérables. La présence d'un atome de chlore dans son motif monomère lui confère une résistance au feu naturellement accrue ainsi qu'une moindre contribution à l'effet de serre en cas

d'incinération. De surcroît son utilisation permet fréquemment d'améliorer le respect de l'environnement (exemple de l'absence d'entretien des volets et des fenêtres, de l'allégement des voitures et de l'accroissement de leur durée de vie, de la protection des nappes phréatiques par les membranes géotextiles, _).

Le PVC contribue au développement social de l'humanité. Cela est vérifié :

- _ dans la santé (les poches à sang en PVC permettent un stockage plus long et plus commode du sang, les équipements en PVC des hôpitaux aident à lutter plus efficacement contre le fléau des infections nosocomiales),
- _ dans le confort de l'habitat, la mise en place plus rapide de réseaux d'adduction d'eau potable et d'assainissement,
- _ dans l'automobile où il permet mieux que tout autre la protection sous caisse des voitures,
- _ dans l'emballage ou les films souples de protection des aliments sont irremplaçables_

En conclusion, NON le PVC n'a pas besoin d'une " stratégie horizontale ", d'une Directive ou d'une réglementation spécifique qui serait injuste puisque non fondée scientifiquement et discriminatoire puisque inexistante pour les autres matériaux naturels ou synthétiques, comme le bois ou le ciment par exemple. Remplacer le PVC serait une erreur économique et social grave , éventuellement même dangereuse pour l'Homme et l'environnement. S'il est largement prouvé que la mise en décharge des déchets en PVC ne provoque aucun risque pour l'Homme et l'environnement, on peut admettre que c'est un non-sens économique. C'est pourquoi je rejoins la Commission dans son souci de favoriser avec pragmatisme le développement de toutes les valorisations possibles des déchets en PVC, sans à priori ni hiérarchie : valorisation énergétique, mécanique ou chimique. Je fais confiance à l'Industrie pour mettre en luvre de tels programmes, à travers son Engagement volontaire.

En vous remerciant de prendre en considération mon courrier, veuillez accepter, Monsieur le Directeur, l'expression de mes sentiments distingués.

Jean-Paul LECA

Message from Jeff Brewer :

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,
Jeff Brewer, Manager eBusiness

Message from Jeffrey Hirl

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 Services Incorporated, 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,
Jeffrey Hirl

Message from Jerrine Neff

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.

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Thank you,

MESSAGE FROM JM MOUSNIER

PVC LE LIVRE VERT

Cher Monsieur,

Je suis employé de la société ATOFINA située à St-Fons (France) dans le secteur de la production de PVC et me sens très concerné par le livre vert de la Commission. J'ai étudié attentivement les 8 questions posées par la Commission, ainsi que la position des industriels exprimée dans l'Engagement Volontaire des producteurs de PVC.

Je souhaite faire les commentaires suivants :

- ⇒ Le PVC est un des matériaux synthétiques les plus modernes :
- ⇒ Il offre une valeur ajoutée importante à la société, par ses nombreuses applications telles que : équipement médical, emballage pharmaceutique, revêtement de sol pour la maison et l'hôpital, des châssis de fenêtres sans entretien, de bonne performance énergétique, des tubes de distribution d'eau assurant leur fonction pendant 100 ans etc...
- ⇒ Notre société fabrique des compositions vinyliques prêtes à l'emploi ; nos produits sont reconnus comme sûrs dans leurs applications, d'autant que nous bénéficions d'une expérience de près de 50 ans sur ces produits.
- ⇒ Des progrès énormes ont été réalisés dans nos usines pour réduire l'impact de nos rejets sur l'environnement.
- ⇒ Quel que soit le matériau considéré, les produits après leur première vie, deviennent déchets. Le recyclage du PVC progresse dans tous les pays d'Europe, et de nouvelles technologies sont en cours d'expérimentation : ceci permettra aux générations futures de traiter convenablement les produits PVC en fin de vie.
- ⇒ De nombreuses questions évoquées dans le Livre Vert s'appliquent à tous les matériaux et pas seulement au PVC. C'est pourquoi je ne comprends pas que la Commission insiste tant sur le PVC, en particulier.
- ⇒ L'importance de l'industrie du PVC, y compris les petites et moyennes industries transformatrices, est considérable en Europe.

C'est pourquoi je soutiens l'Engagement Volontaire de l'industrie de PVC qui nous a été présenté dans nos usines.

En conclusion je recommande à la Commission de retenir les propositions de l'Engagement Volontaire : ce dernier permet l'approche la plus efficace pour améliorer la situation écologique et économique du PVC.

Je souhaite que le PVC soit traité comme tout autre matériau synthétique ou naturel.

Espérant que ce témoignage aidera la Commission à définir une voie réaliste et porteuse de progrès pour nos concitoyens, je vous prie d'agréer, Cher Monsieur, l'expression de mes sentiments distingués.

JM MOUSNIER

Message from Joel Camos

1. Ce matériau universellement utilisé dans la vie courante est actuellement violemment attaqué . Aucune enquête scientifique sérieuse n'a actuellement révélé une quelconque nocivité .

Sa mise en oeuvre facile en fait le matériau idéal pour le "bricoleur" qui veut réaliser lui même ses conduites d'évacuation d'eaux usées .

2. Je crois en l'avenir du PVC en tant que salarié dans une entreprise fabriquant ce produit .Je vois bien à travers mon travail que nous apportons des améliorations constantes à nos technologies de fabrication et de transformation , comme en ce qui concerne l'élimination des sous produits et la maîtrise des effluents de tous ordres . Nous sommes fiers , mes collègues et moi , de fabriquer du PVC dans une usine et un service qui font tous les efforts possibles pour améliorer la qualité du produit et travailler proprement .

Message from John O'Bryan

Dear Mr. Kramer / Mr. Schulte Braucks:

Thank you very much for the opportunity to comment on the European Commission's Horizontal Studies and Green Paper on PVC. I am an employee of OxyVinyls, LP a manufacturer of PVC resin in Louisville, KY, USA. These resins are used in the manufacture of PVC in the United States and Canada. The plant in Louisville employs around 100 people. My company also has 4 other locations in the USA and Canada producing PVC resin. Recognizing the global nature of business in the 21st century, I am concerned about the potential impact of European Union's actions on international trade and my company's business.

PVC is a modern product used in continuously developing technologies. Whether as building materials or medical products, PVC brings benefits to society in a number of ways. The industry has worked diligently in recent years to improve manufacturing processes, reduce emissions and address waste problems.

I am aware that the European Commission is considering new policies that might include regulations of PVC. I find it troubling that this could be done in the absence of similar Horizontal Studies on alternative materials. It does no benefit to society, the environment or the economy to drive products from a well-studied material to another about which less is known. I assume that analysis of a similar scale is forthcoming on alternative materials.

The European PVC Industry has brought forward a number of proposals to address the concerns expressed in the Green Paper. This Voluntary Commitment is bold, innovative and progressive and should be given highest consideration by the Commission. Regulation should be a last resort, and only in the event that voluntary action by the industry eventually proves to be insufficient.

Thank you very much for your consideration. I will watch the process in Europe with great interest.

Very truly yours,

John O'Bryan

Message from Jon Hanson

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 OxyVinyls, LP, 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,
Jon C. Hanson

Message from Joseph Mishan

Dear Sir

I am totally against the use and production and use of PVC. PVC is totally unsustainable, cannot be produced without creating deadly dioxin, it is difficult to recycle, dangerous to burn, doesn't degrade in landfill, leaches phthalates, and if used in contact with food could leach phthalates and other additives into food.

I was horrified to find out the problems associated with PVC months after my youngest child started to suck a dummy presumably made of this material. The government should ban it immediately until it is proven safe.

Yours sincerely

Message from Joseph Romm

Hello,

Be strong. You are all doing the right thing.

Kai Abelkis
Environmental Coordinator
Boulder Community Hospital

"Waste is not an inevitable result of production but rather a measure of its inefficiency."

Joseph Romm
Lean & Clean Management

Message from Joshua Jacobson :

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,
Joshua Jacobsen

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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,
Karen Frieder

Message from Karen Sinar

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.

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,

Message from Karen Pulley :

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,
Karen Pulley

Message from Kathleen Dziekan

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 such action might have on international trade my company's business, our customers' business and my own job.

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,
Kathleen Dziekan

Message from Ken Clayton

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Thank you,
Ken Clayton

Message from Kerry Lawson

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.

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,
Kerry Lawson

Message from Kevin Spangler :

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,
Kevin C. Spangler

Message from Linda Katz

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 Services Incorporated, 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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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,
Linda Katz

Message from Lovagnini P. Ersilio

Torromeo Marco

Morelli Giuseppe

Zanelotti P.Luciano

In difesa del PVC

Il Libro Verde, pubblicato dalla Commissione Europea il luglio scorso, mi lascia perplesso come cittadino/consumatore e soprattutto preoccupato come dipendente della Solvay Italia.

Ecco le motivazioni:

- Il PVC è, ad oggi, un materiale utilizzato per un gran numero di applicazioni: edilizia, settore automobilistico, industria elettrica ed elettronica, agricoltura, piscine, impermeabilizzazione, accessori da viaggio, articoli sportivi, giocattoli, barriere antinquinamento, pavimentazioni, profili per porte e finestre, carte di credito, nastri adesivi, settore sanitario, imballaggio.

Inoltre con il riciclaggio di PVC vengono realizzati:

cavi elettrici, tubi per fognature, raccordi per canalizzazioni, lastre, rinforzi per calzature, materiali da giardino e recinzioni

- Il PVC ha apportato degli incontestabili benefici alla nostra vita quotidiana negli ultimi 50 anni, creando prodotti utili a tutti e soprattutto **offrendo nuove opportunità di lavoro e di sviluppo per importanti settori industriali ora potenzialmente minacciati.**
- **È importante sottolineare l'elevato rapporto qualità-prezzo** di questo materiale: il PVC permette di fabbricare prodotti di alta qualità, molto resistenti e durevoli nel tempo, che rispondono bene alle esigenze dei consumatori.
- Ritengo che il PVC sia in sostanza un prodotto "ecologicamente corretto" e grazie al programma di iniziative dell'*Impegno Volontario* dell'industria del PVC, a cui il Gruppo Solvay ha aderito, il bilancio d'impatto ambientale non potrà che migliorare.

Sono al corrente inoltre che sono in corso vari investimenti: ad esempio Solvay Italia, entro luglio 2001, renderà operativo un impianto innovativo, in costruzione a Ferrara, destinato al recupero/riciclaggio di manufatti compositi in PVC.

Ritengo dunque che le elevate "preoccupazioni ambientaliste" sollevate in merito all'utilizzo di questo materiale siano infondate.

Grazie per l'attenzione a considerare questo mio intervento.

Data

Firma

10/10/2000

Lovagnini P. Ersilio

Torromeo Marco
Morelli Giuseppe
Zanelotti P.Luciano
Spagnoli Lorenzo

Message from Luc Thys

Europese Commissie
Directoraat Generaal Ondenemingsbeleid
T.a.v. de heer R. Schutte-Braucks
Hoofd afdeling Chemie
Wetstraat 200
B-1049 Brussel

Geachte Heer Schutte-Braucks,

Ik heb kennis genomen van een aantal voornemens inzake PVC vervanging vanwege de EU Commissie.

Vanuit mijn professionele achtergrond heb ik inmiddels een tiental jaar ervaring met PVC en andere materialen (FPP, EPDM, CPE, etc.) voor de toepassing in afdichtingsfolies.

Ik betreur sterk de eenzijdige weergave van eigenschappen van weegemaakt PVC.

1. Inzake brandveiligheid scoort PVC uitstekend, in tegenstelling tot bv. PP of vele andere substituten.
2. Inzake recyclage hebben we vandaag reeds een oplossing die we onze klanten aanbieden, incl. terugname van de verzamelde materialen op de werf. Hierbij worden materialen in gelijkaardige toepassingen gerecycleerd !
3. Inzake stabilisatoren: cadmium wordt al lang niet meer gebruikt en loodstabilisatoren worden nu reeds in ruime mate vervangen en zullen ook in de toekomst verder verminderen. De grondstof PVC-P moet niet via mogelijke additieven bekritiseerd worden.
4. Inzake materiaalverbruik en prijs scoort PVC zeer goed. Met een minimaal materiaalverbruik, is men in staat hoogwaardige toepassingen te realiseren. Voor vele toepassingen is een veelvoud aan tonnage nodig voor andere grondstoffen.

PVC heeft als materialen voor- en nadelen, zoals elke andere stof. Indien U PVC voor bepaalde toepassingen wil reduceren, gelieve PVC dan ook te willen promoten voor toepassingen waarvoor het materiaal uitstekend geschikt is.

Met vriendelijke groeten,

Luc Thys
Sales and Marketing Manager
Roofing and Garden Ponds

Message from Luca Galante

Mr. Schulte-Braucks, Mr. Kraemer

Nell'ambito dell'industria del PVC la nostra società si occupa di ingegneria sia per quanto riguarda la realizzazione di nuovi impianti, che per la manutenzione di quelli esistenti.

Lavorando da anni nel settore a stretto contatto con i responsabili tecnici impiantisti, viviamo da vicino la sua realtà e le vicende ad esso connesse. Da molto tempo notiamo una forte sensibilizzazione di tutto il comparto riguardo le problematiche ecologiche inerenti le loro produzioni, e riconosciamo una notevole volontà di migliorare gli standard qualitativi in ogni ambito sia per quanto riguarda l'impatto ambientale, che per la sicurezza del personale addetto o degli insediamenti limitrofi.

Nell'area economica ove noi operiamo, il settore del PVC ha creato un fitto indotto che negli anni ha saputo modellarsi in funzione delle esigenze dell'industria chimica; tecnici ed operatori sono quotidianamente occupati nello sviluppo e nella gestione del settore, con il supporto dell'esperienza acquisita nel tempo.

Riconosciamo l'indiscutibile autorità e competenza della Commissione Europea e auspichiamo che le sue finalità siano in sintonia con tutto il movimento che circonda noi e la nostra attività, non dimenticando gli sforzi e i miglioramenti fin qui espressi dall'industria di settore.

Ringraziamo per l'attenzione concessaci e formuliamo i nostri più distinti saluti

Luca Galante

Message from Lyndon Lowe

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,
Lyndon Lowe

Message from Lynn Collins

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 such action might have on international trade my company's business, our customers' business and my own job.

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,

Message from Lynn Hargrove

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.

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 Marc Verstichel

1 PVC zou niet milieuvriendelijk zijn ???

enkele bedenkingen :

PVC is perfect recycleerbaar : wij doen dit dagelijks voor tal van toepassingen (recyclage van oude dakbedekkingen in PVC, recyclage van PVC ramen en deuren, recyclage van PVC drankverpakkingen in nieuwe rioleringsbuizen

PVC drankverpakkingen hebben veel minder energie nodig om geproduceerd te worden dan glas, en wegen lichter zodat een zelfde hoeveelheid water op een vrachtwagen veel minder weegt in PVC flessen dan in glazen flessen, waardoor de vrachtwagen veel brandstof bespaart => minder uitstoot van ozon-onvriendelijke gassen

Glazen flessen moeten gespoeld worden om opnieuw te kunnen gebruiken, wat met het spoelwater ??? PVC flessen zijn door het maken alleen al kiemvrij (hoge temperatuur tijdens het blazen van de flessen.

- Is er uiteindelijk geen verder alternatief beschikbaar, dan kan PVC gecontroleerd verbrand worden waarbij veel energie vrijkomt die opnieuw kan gebruikt worden

- PVC is een natuurproduct : de grondstoffen zijn aardolie en zout

aten we PVC koesteren, het is een van de meest milieuvriendelijke stoffen

Met vriendelijke groeten,

2 Verbranding van PVC zou problemen geven ??

- Studies tonen aan dat het gehalte aan PVC in het huisvuil geen invloed heeft op de dioxineuitstoot van de verbrandingsovens. Vuilverbranding in de tuin stoot meer dioxines uit dan een hele verbrandingsoven.

PVC kan nog meer gerecycleerd worden.

Inderdaad wordt reeds veel PVC gerecycleerd : PVC leidingen, PVC ramen en deuren, PVC dakbedekkingen worden reeds in grote mate gerecycleerd. Reeds meer dan 50 % van het jaarlijks geproduceerd materiaal in PVC wordt terug gebruikt. Dit is perfect haalbaar en redabel. Er bestaat een goed georganiseerde inzamelstructuur voor. Ook voor andere toepassingen is een systeem denkbaar om nog meer te recycleren.

PVC materiaal voor de bouwnijverheid wordt nu reeds met terugnamegarantie verkocht.

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PVC materiaal voor de bouwnijverheid wordt nu reeds met terugnamegarantie verkocht.

Message from Marie-Jeanne Toussaint :

A l'attention de Mr Krämer, Head of the Waste Management Unit (Directorate-General "Environment").

Monsieur KRAMER,

En tant que consommatrice, je suis tout à fait persuadée de l'utilité du PVC, tant pour leurs emplois vitaux dans le domaine médical (poche de sang,...) que dans la vie de tous les jours (emballages hygiéniques, câbles électriques, recouvrements,...).

Ses possibilités de recyclage en font un matériel en harmonie avec l'environnement.

De plus, sa production est maîtrisée.

En vous remerciant pour votre attention, je vous prie d'agréer, Monsieur Krämer, mes meilleures salutations.

Marie-Jeanne Toussaint

MESSAGE FROM MARIO CONTI

Bonjour,

Faites l'expérience pendant 1 jour:

soyez observateurs et posez-vous une première question "de quoi sont fait les objets qui sont autour de moi ou que j'utilise?"

Et bien le mot PVC reviendra très souvent !!

Ce matériau est devenu tellement présent que l'on en oublie ses usages et ses avantages.

Posez-vous maintenant une deuxième question "et si les objets en PVC qui sont autour de moi ou que j'utilise devaient disparaître du jour au lendemain?"

Et bien le mot PVC ne reviendra plus, mais quel retour en arrière !!!

Il est intellectuellement correct de vouloir débattre des questions environnementales liées à un produit quel qu'il soit, mais il faut que ce débat se base sur des études scientifiques existantes ou à venir.

J'espère que l'avenir d'un produit tel que le PVC ne se décidera pas à la légère!!

Prenez le temps de la réflexion !!

Entourez-vous d'experts scientifiquement compétents !!

Soyez prudents dans vos réflexions de suppression de tel ou tel additif. Indirectement, cela peut conduire à la disparition du PVC à court terme !!

N'oubliez pas que grâce au PVC, il y a des femmes et des hommes qui travaillent !!

Dépassionnez le débat !!

En conclusion, j'espère que la première consultation publique à l'échelon européen ne sera pas un désastre pour l'avenir d'un produit tel que le PVC.

Vous l'aurez compris, je suis:

- pour le PVC
- pour les débats menés scientifiquement

mais je suis contre les arguments destructeurs et non fondés de certaines ONG (Greenpeace pour ne pas la citer).

Je vous remercie pour votre attention

Mario CONTI

Message from Mario Da Lio :

Spinea, 6 Ottobre 2000.

Ho letto il "Libro verde" (COM/200/469) sul PVC e propongo al riguardo le seguenti osservazioni:

- * Anche se il progetto costituisce un tentativo di portare il dibattito su basi scientifiche, devo rilevare che comunque l'impostazione generale risenta ancora del clima emotivo derivante dalla pressione della pubblica opinione sistematicamente male informata o, peggio, informata in modo tendenzioso e prevenuto durante il decennio scorso.
- * Sono stati del tutto taciuti i vantaggi che l'uso del PVC ha portato per lo sviluppo della nostra società negli ultimi 50 anni contribuendo in maniera determinante allo sviluppo del benessere e della sicurezza della nostra civiltà (uso in campo medico, elettrico, civile, con prodotti specificatamente studiati per le esigenze relative a particolari usi e quant'altro). Si enfatizzano solo i costi sociali (peraltro non ben definiti) ma non si considerano in alcun modo i benefici sicuramente ottenuti dalla diffusione del PVC.
- * Il progetto è pieno di espressioni aleatorie del tipo: "si ritiene...", " si stima..." che non si addicono ad uno studio scientifico.
- * Nessun' altra materia plastica è stata studiata come il PVC: questo fatto è una garanzia che gioca a suo favore. Si dovrebbero studiare anche tutte le altre materie plastiche altrettanto severamente.
- * L'uso del piombo come stabilizzante va scomparendo per scelta autonoma dell'industria di trasformazione del PVC che sempre più è orientata verso stabilizzanti al calcio/zinco.
- * Bisognerebbe verificare l'attendibilità degli studi sul rilascio e sulla nocività degli ftalati. A questo proposito il libro verde non fornisce alcuna indicazione quantitativa. In altre parole, quanto ftalato un bambino dovrebbe ingerire perché ci sia un rischio reale per la sua salute? e questa quantità realmente nociva potrebbe provenire dal rilascio da giocattoli succhiati?
- * L'allegato 2 "costi aggiuntivi per l'incenerimento del PVC" non tiene conto che la maggior parte dei manufatti in PVC contiene carbonato di calcio che contribuisce a limitare le emissioni di acido cloridrico in caso di distruzione termica.

Eventuali nuovi problemi che emergano nel campo dell'uso del PVC dovrebbero essere risolti con il determinante concorso di esperti principalmente provenienti da chi il PVC lo conosce, ovvero da chi ci lavora sopra.

Auspicio che nessuna indicazione legislativa venga suggerita fino a che c'è un clima emotivo di prevenzione nei riguardi del PVC. Ricordo a tale proposito il referendum per la chiusura delle centrali nucleari tenuto in Italia proprio all'indomani dell'incidente di Chernobyl o la confusione e la conseguente legislazione

contraddittoria tra i vari stati europei nel settore della esposizione ai campi magnetici dove al momento non c'è alcuna certezza scientifica e la legislazione è stata fatta in base alle varie emozioni.

Pertanto auspico che si approfondiscano gli studi fino ad arrivare a certezze scientifiche in base alle quali emanare legislazioni opportune.

Cordiali saluti

Da Lio Mario.

Message from Mark Beardsley

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,
Mark Beardsley

MESSAGE FROM MARK MEHAR

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Thank you,
Mark L. Merhar

Message from Mark Walters

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.

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.

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Message from Mary Collins

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Thank you,

Message from Mary Purcell :

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Thank you,
Mary Purcell

Message from Mary Stephenson :

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Thank you,
Mary Stephenson

Message from Massimo De Vecchi

Buongiorno,

il Libre Verde, pubblicato dalla Commissione Europea il luglio scorso, mi lascia perplesso come cittadino/consumatore e soprattutto preoccupato come dipendente della Solvay Italia.

Ecco le motivazioni:

* Il PVC è, ad oggi, un materiale utilizzato per un gran numero di applicazioni: edilizia, settore automobilistico, industria elettrica ed elettronica agricoltura, piscine, impermeabilizzazione, accessori da viaggio, articoli sportivi, giocattoli, barriere antinquinamento, pavimentazioni, profili per porte e finestre, carte di credito, nastri adesivi, settore sanitario, imballaggio. Inoltre con il riciclaggio di PVC vengono realizzati: cavi elettrici, tubi per fognature, raccordi per canalizzazioni, lastre, rinforzi per calzature, materiali da giardino e recinzioni

* Il PVC ha apportato degli incontestabili benefici alla nostra vita quotidiana negli ultimi 50 anni, creando prodotti utili a tutti e soprattutto offrendo nuove opportunità di lavoro e di sviluppo per importanti settori industriali ora potenzialmente minacciati.

* È importante sottolineare l'elevato rapporto qualità-prezzo di questo materiale: il PVC permette di fabbricare prodotti di alta qualità, molto resistenti e durevoli nel tempo, che rispondono bene alle esigenze dei consumatori.

* Ritengo che il PVC sia in sostanza un prodotto "ecologicamente corretto" e grazie al programma di iniziative dell'Impegno Volontario dell'industria del PVC, a cui il Gruppo Solvay ha aderito, il bilancio d'impatto ambientale non potrà che migliorare.

Sono al corrente inoltre che sono in corso vari investimenti: ad esempio Solvay Italia, entro luglio 2001, renderà operativo un impianto innovativo in costruzione a Ferrara, destinato al recupero/riciclaggio di manufatti composti in PVC.

Ritengo dunque che le elevate "preoccupazioni ambientaliste" sollevate in merito all'utilizzo di questo materiale siano infondate

Grazie per l'attenzione a considerare questo mio intervento.
Cordiali saluti,

MASSIMO DE VECCHI

Controller

Solvay Chimica Italia S.p.A. - Rosignano

Tel.: +39-586-721133 Fax: +39-586-721721

e-mail: massimo.devecchi@solvay.com <mailto:massimo.devecchi@solvay.com>

SOLVAY WEB: www.solvay.com <http://www.solvay.com>

Message from Maurizio Mazzurana

Mr. Schulte-Braucks
Mr. Krämer

Oggetto: "libro verde sul PVC".

In qualità di responsabile dell'Ufficio Tecnico Ricerca e Sviluppo della società Alphacan S.p.A. di Pergine mi sento in dovere di sottolineare alcuni punti molto importanti per quanto riguarda le caratteristiche del PVC al quale è indissolubilmente legato il livello qualitativo della nostra vita.

1) PRESENTAZIONE DELLA SOCIETA'

Alphacan S.p.A. produce e commercializza sistemi per la realizzazione di serramenti in PVC. L'estrusione dei profili in PVC per serramenti rappresenta quindi la principale attività della nostra società.

2) IL PVC NELLA SERRAMENTISTICA

Il serramento in PVC, grazie alla natura intrinseca del materiale base di cui è costituita la struttura principale, racchiude in sé tutta una serie di caratteristiche fisico-meccaniche che rappresentano le soluzioni ideali ad ogni tipo di esigenza legata alla fisica edilizia, ma non solo.

3) IL PVC E L'ABITAZIONE

- a) L'alto isolamento termico del serramento in PVC migliora il bilancio energetico legato al riscaldamento degli edifici con i seguenti vantaggi:
- Riduzione dei consumi di combustibile,
 - Riduzione delle emissioni di CO₂ legate al riscaldamento degli edifici,
 - Miglioramento del comfort abitativo grazie all'eliminazione di condensa e muffe all'interno dell'abitazione.
- b) L'alto isolamento acustico del serramento in PVC garantisce:
- miglior comfort acustico ed isolamento dai rumori esterni.

4) IL PVC E L'ECOLOGIA

- a) La riciclabilità degli scarti nel reparto di estrusione dei profili, il recupero degli sfridi nel reparto di produzione del serramento e la possibilità di riciclare la finestra al termine del ciclo di vita (la finestra in PVC viene normalmente sostituita per esigenze puramente estetiche legate ai mutamenti dell'indice di gradimento geometrico degli oggetti d'arredamento) testimoniano il basso impatto ecologico della finestra in PVC.
- b) La totale assenza di manutenzione sul serramento in PVC elimina i costi post-installazione sul manufatto.

5) CONCLUSIONI

In definitiva, ritengo che nel campo della serramentistica il PVC rappresenti l'unica soluzione in grado di garantire le migliori caratteristiche del manufatto finale finestra.

Saluto cordialmente.

Maurizio Mazzurana

Message from Maximilian B. Goresek

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 OxyVinyls, LP, 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,
Maximilian B. Goresek

MESSAGE FROM MEADE BETHEL

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,
Meade Bethel

Message from Meazzini Federico

In difesa del PVC

Il Libro Verde, pubblicato dalla Commissione Europea il luglio scorso, mi lascia perplesso come cittadino/consumatore e soprattutto preoccupato come dipendente della Solvay Italia.

Ecco le motivazioni:

- Il PVC è , ad oggi, un materiale utilizzato per un gran numero di applicazioni: edilizia, settore automobilistico, industria elettrica ed elettronica, agricoltura, piscine, impermeabilizzazione, accessori da viaggio, articoli sportivi, giocattoli, barriere antinquinamento, pavimentazioni, profili per porte e finestre, carte di credito, nastri adesivi, settore sanitario, imballaggio.

Inoltre con il riciclaggio di PVC vengono realizzati:

cavi elettrici, tubi per fognature, raccordi per canalizzazioni, lastre, rinforzi per calzature, materiali da giardino e recinzioni

- Il PVC ha apportato degli incontestabili benefici alla nostra vita quotidiana negli ultimi 50 anni, creando prodotti utili a tutti e soprattutto **offrendo nuove opportunità di lavoro e di sviluppo per importanti settori industriali ora potenzialmente minacciati.**
- **È importante sottolineare l'elevato rapporto qualità-prezzo** di questo materiale: il PVC permette di fabbricare prodotti di alta qualità, molto resistenti e durevoli nel tempo, che rispondono bene alle esigenze dei consumatori.
- Ritengo che il PVC sia in sostanza un prodotto "ecologicamente corretto" e grazie al programma di iniziative dell'*Impegno Volontario* dell'industria del PVC, a cui il Gruppo Solvay ha aderito, il bilancio d'impatto ambientale non potrà che migliorare.

Sono al corrente inoltre che sono in corso vari investimenti: ad esempio Solvay Italia, entro luglio 2001, renderà operativo un impianto innovativo, in costruzione a Ferrara, destinato al recupero/riciclaggio di manufatti compositi in PVC.

Ritengo dunque che le elevate "preoccupazioni ambientaliste" sollevate in merito all'utilizzo di questo materiale siano infondate.

Grazie per l'attenzione a considerare questo mio intervento.

Data

Firma

09/10/00

Meazzini Federico

Message from Annie Lemoine

- Vous prêt à refuser une transfusion sanguine sous prétexte que la poche de sang est en PVC plastifié avec des phtalates ? A l'heure actuelle, aucun autre matériau offrant les mêmes performances et la même sécurité n'existe sur le marché. Depuis 1947 le PVC existe. Depuis plus de 50 ans des produits en PVC sont utilisés dans le système de santé.

Imaginons un hôpital sans :

- * Perfusion ;
- * seringues ;
- * tuyaux et cathéters ;
- * sondes gastriques et pulmonaires,
- * perfusion ;
- * alèses ;
- * attelles gonflables ;
- * matelas anti escarre ;
- * poches recueil postopératoire ;
- * champs opératoires ;
- * ameublement ;
- * dialyse rénale et dialyse péritonéale ;
- * circulation extracorporelle ;
- * tentes à oxygène ;
- * murs et sols aux recouvrements hygiéniques et facilement désinfectés
- * matériel médical jetable etc...

Rappelons-nous que beaucoup de ces objets en PVC ne sont pas réalisables en d'autres matériaux avec les mêmes performances et la même sécurité.

En effet le PVC à usage médical est à la fois polyvalent, imperméable aux odeurs et à l'oxygène, léger, solide, transparent, soudable, stérilisable, résistant, colorable et imprimable (pour des identifications sans possibilité d'erreurs !), confortable (à température ordinaire il est plus rigide mais idéalement souple à température corporelle) .

LEMOINE Annie - Sce APPROVISIONNEMENTS TAVAUX FRANCE

Message from Michael Moran

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 European Union's actions on international trade, my company's business, our customers' business and my own job. This is particularly true as it involves the use of phthalate plasticizers.

Phthalates have been used safely in the US for flexible PVC for a half-century. While I understand questions have been brought forward about phthalates, no legislative measures should be taken until the results of the ongoing risk assessments are available. The plasticizer producers have provided significant data to national authorities in order to support these ongoing EU risk assessments. The Industry is committed to continue to do so until the assessments are completed. If risk reduction measures are appropriate, manufacturers, as practitioners of Responsible Care®, will undoubtedly take immediate action.

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 phthalate plasticized 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,
Michael Moran