

Message from Ron Veath

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,
Ron Veath

Message from Rose Bedwell

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 RSU

Mozione della Rappresentanza Sindacale Unitaria (RSU) della Reagens SpA

La Rappresentanza Sindacale Unitaria (RSU) della Reagens SpA, avendo esaminato con cura e attenzione il processo di “Iniziativa Orizzontale” ed il contenuto del “LibroVerde” della Unione Europea sulle Tematiche Ambientali del PVC e avendo tenuto conto che:

Il PVC è uno dei più importanti materiali sintetici moderni

Il “Libro Verde” non solleva questioni significative specifiche per il PVC la gestione dei rifiuti non è un problema specifico del PVC, ma un tema generale di risorse che riguarda l’intera società sono già stati fatti dei miglioramenti determinanti nel nostro sito produttivo per giungere allo “Sviluppo Sostenibile”

Il PVC offre un enorme valore aggiunto alla società l’industria del PVC è significativa nella nostra area (160 addetti nella Reagens, provenienti principalmente dalle province di Bologna e Ferrara), in Italia (40.000 addetti per 1100 imprese) e in tutta Europa (530.000 addetti per 20.000 imprese) l’impatto dell’intera industria del PVC su tutta l’economia Europea è rilevante l’insuccesso nel ricercare potenziali alternative efficaci quanto il PVC non dovrebbe portare a nessuna discriminazione contro il PVC stesso sostiene pienamente l’approccio volontario e l’Impegno Volontario” dei produttori di PVC e dei loro partner nell’industria.

La Rappresentanza Sindacale Unitaria (RSU) della Reagens SpA perciò, raccomanda fortemente alla Commissione Europea di accettare l’ “Impegno Volontario” poiché offre lo approccio più efficace per fornire una “Product Stewardship” (1) ancor più migliorata e assicuri che il PVC venga trattato come qualsiasi altro materiale. La Commissione deve anche riconoscere e realmente sostenere l’ attiva dedizione dell’ industria nell’ ottenimento di un futuro sostenibile per i suoi prodotti.

Firmato

I componenti della Rappresentanza Sindacale Unitaria (RSU)

Federico Albani

Mansione: Campionatore

Eros Luciano Bolognesi

Mansione: Capo Operaio

Giancarlo Fulghesu

Mansione: Segreteria di Reparto

Massimo Macchiavelli

Mansione: Conduttore Impianti

- (1) Per “Product Stewardship” si intende la gestione responsabile ed etica degli aspetti legati a salute, sicurezza e impatto ambientale di un prodotto durante il suo ciclo di vita.

Message from Russ Morgan

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,
Russ Morgan

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

09/10/2000

Seminara Salvatore
Cremascoli Bassano
Zottarelli Vincenzo

Dear Sirs

Please find in the following Word-attachment the comment of Sarnafil International AG to the 8 question asked with regard to the Green Book on PVC.

Sarnafil International AG is an internationally active company with headquarters in Sarnen/Switzerland. We produce and sell roofing and waterproofing products and systems. PVC is one of the materials we use, among others. Our European subsidiaries asked to prepare the above comment by the headquarters. Therefore we are sending you these comments directly from Switzerland.

We kindly ask you to let us know if you accept only comments from EC member countries. In that case we would submit our comments through a Sarnafil company within the EC.

Yours sincerely

Hans-Rudolf Beer
Head of R&D
Sarnafil International AG

Statement by Sarnafil International AG on the EU Green Book

Question 1: The use of cadmium and lead as stabilisers

In the sense of a sustainable waste management concept, the focus on materials hazardous to human beings and the environment is of major importance. Like the Commission, we are of the opinion that the transfer of heavy metals to the environment must be avoided as far as possible by means of precautionary measures.

Suitable strategies must accordingly be developed for all heavy metals. In this respect, our industry emphasises by the principle of voluntary commitment. This would have the following meaning for the different heavy metals:

Cadmium:

No further use of cadmium in new products.

Industry would welcome legislative measures banning the import of cadmium containing new products (see question 3 re. product recycling policies) into the EU.

Lead and other heavy metals:

With regard to heavy metals, renunciation should be determined in agreement with industry as with cadmium, e.g. within 5 years.

Justified exceptions should be permissible.

Question 2: The use of phthalate plasticisers

The use of phthalate plasticisers cannot be dispensed with in the flexible PVC product group in future. Our industry is also concerned about the discovery that the existence of phthalates as a chemical can be demonstrated ubiquitously in all areas of Nature.

Since evaluations and scientific investigations are still taking place on the European level, no conclusive assessment of the transitional routes and the corresponding measures is possible. These results and any additional investigations should serve as the basis for determining specific measures.

In 1998, the American Council on Science and Health brought together a panel of 17 independent experts from the United States, Canada and Europe. Their task was to establish an assessment on the danger of phthalates with regard to health. The panel's conclusions were clear. While there is no such thing as "zero" risk, the objective scientific evidence shows that phthalates are safe in use. Any possible measures must be oriented towards existing potential reductions in its harm to the environment. For example, these include:

- Reduction in emissions in the production process to a technically feasible level.
- Targeted measures in applications involving critical plasticiser migration.
- A recycling policy that takes the load off landfills (q.v. question 3).

Question 3: Increase in PVC recycling

We agree with the Commission that the recycling of PVC – as well as that of other plastics – must be increased in the sense of a sustainable waste management concept.

In connection with PVC, recycling is of central importance, in particular, since landfilling (possible impact of stabilisers and plasticisers) and incineration (q.v. also question 6) are subject to close limits and these methods of disposal do not fulfil the recognised criteria in terms of sustainability.

The recycling of PVC in every form will thus be of central importance in future.

In the sense of a desirable increase in PVC recycling, we are therefore of the opinion that the following measures should be taken or introduced:

1. Synergies between the sectors should be sought throughout the entire PVC branch, for example, by forming "recycling areas" with similar areas of problems. Suitable recycling strategies should be defined for these areas or individual sectors. Quantitative balances should be drawn up for this and suitable recycling processes and joint targets established. The focus of this should be placed on a return to pure sorts.
2. The principle of voluntary commitment should be pursued (supervised by the EU).
3. Both material-related as well as raw material-related recycling processes must be promoted, the target being to obtain secondary raw materials free of heavy metals in an ecologically efficient way. As long as the corresponding recycling processes are not available, stabilisers containing heavy metals should be able to be used under controlled conditions in their traditional area of application via recycle.
4. The cost of recycling must be borne by those responsible with as many value-added stages as possible included. By means of flanking measures (e.g. legal conditions as in Switzerland), an attempt must be made to prevent uncontrolled streams from wandering into incinerators or landfills, which are currently cheaper.
5. Consideration should be given to the question of whether it is necessary to mark the PVC products for the recycling policy envisaged (new product and recycle).

Question 4: Recycling of PVC waste containing heavy metals

According to the current state of our information, no eco-efficient processes are available at the moment that would allow heavy metal content to be separated from PVC polymer. The following principles and regulations should be observed until the corresponding processes are available:

- The permissible levels of heavy metals in recyclates as well as the possible areas of application must be regulated by mutual agreement with the industry concerned.

- Recyclates containing heavy metals should only be permitted in the traditional area of application.

Question 5: Chemical recycling of PVC waste

We believe that chemical recycling has a good chance as part of a progressive recycling policy. We envisage the following measures for the promotion of chemical recycling:

- Regular information on the part of interested circles on the status of the development, quantity and quality of the resultant material volumes.
- Introduction of conditions re. incineration and landfilling.
- Voluntary commitment targets by the industry.
- Incentives for the promotion/optimisation of recycling technologies.

Question 6: Incineration of PVC waste

The large-scale incineration of plastic waste in general, and especially of PVC waste, is incompatible with a sustainable waste management concept (no energy recycling for plant-based efficiency reasons, problems of corrosion and special waste).

PVC waste should thus mainly be redirected towards recycling within the framework of the policy described (question 3) wherever it makes both ecological as well as economic sense.

As an option, incineration is of subordinate importance (within the framework of "natural" waste containing chlorine and for fractions that are difficult to separate).

Question 7: Landfilling of flexible PVC waste

Within the framework of a general waste strategy, PVC waste must be recycled wherever it is possible and meaningful.

Corresponding requirements should be introduced to reduce the attractiveness of landfilling.

Question 8: Substitution policy

Even today, PVC products are being compared with possible substitutes on the basis of eco-efficiency criteria. In many cases, PVC comes off equally or better (e.g. windows). The market will then decide on the basis of the overall price-performance ratio of the products evaluated.

The realisation of the policy described here will make PVC even more attractive from an ecological standpoint, i.e. its market position will be strengthened if recycling can be further expanded at a sensible cost.

In the medical sector many PVC products cannot be substituted. Scientific studies showed evidence that the PVC floorings were ranking first with respect to hygiene in hospitals. The efficiency and safety of blood bags and medical tubes made of PVC are unparalleled. The question may be allowed, why PVC products are fully accepted in such sensitive applications as human health care, whereas they are put to discussion in much less critical applications.

Given these prerequisites, no special measures are required where substitution is concerned.

Message from SEPA

FAENZA, 10/10/2000

Spett.le
COMMISSIONE AMBIENTE EUROPEA DI BRUXELLES

Siamo un'azienda produttrice di oggetti finiti in PVC per la fotografia, l'industria, l'ufficio ed ecc. Negli ultimi anni, il film di Polivinile si è dimostrato indispensabile per la nostra attività per la versatilità e l'ottimo rapporto qualità-prezzo. Temiamo che la campagna discriminatoria che si sta mettendo in atto, sia frutto di strumentalizzazioni e cattiva informazione. Non vorremmo che questa campagna mettesse in serie difficoltà la nostra azienda.

Distinti saluti

SEPA S.R.L.

Messages from Stanley Giniewski

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,
Stanley Giniewski

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,
Stanley Giniewsk

MESSAGE FROM STEEVE DEETSCH

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, Kentucky USA. OxyVinyls is a major producer of PVC resin in North America. The Louisville Plant, which employees approximately 100 people, is one six OxyVinyls' sites producing PVC. Recognizing the global nature of business in the 21st century, I am concerned about the potential impact of European Commission's actions on international trade and my company's business.

PVC is a modern product used in continuously developing technologies. It brings benefits to society through many products. 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,

Steve Deetsch

Message from Stefano Montanari

Io lavoro nella fabbricazione del PVC da 13 anni e non ho conosciuto nessuno che abbia avuto problemi di salute collegabili ad esso.

Saluti

Stefano Montanari

Solvay Benvic Italia s.p.a.

Message from Steve BROWN

> Dear Mr. Kramer / Mr. Schulte Braucks:

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> Very truly yours,

>

Steve T. Brown

Technical Manager - OxyVinyls Louisville Kentucky Plant

Message from Sue Jenkins

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 Susan Horn

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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,
Susan Horn

Message from Susan Ruoff

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Thank you,
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Message from Taffi Fabrizio

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09/10/00

Taffi Fabrizio

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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,
Ted J. Michalik

Message from Ted Brenneman :

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,
Ted Brenneman

Message from The Finnish Plastics Industries Federation :

Helsinki 9.10.2000

PVC-vihreä kirja : Suomen Muoviteollisuusliiton lausunto ja vastaukset kirjassa esitettyihin kysymyksiin

Suomessa toimii yli 40 muovituoteyritystä, joille PVC on tärkeä raaka-aine. Nämä yritykset työllistävät suoraan 1800 henkilöä ja niiden yhteenlaskettu vuosiliikevaihto ylittää 300 miljoonaa euroa. Merkittävä osa valmistetuista PVC-tuotteista menee vientiin. PVC:tä myös tuotetaan Suomessa. PVC hyvin tunnettu ja laajassa käytössä oleva materiaali ja sen yhteiskunnan hyvinvointia tukeva vaikutus on monikertainen edellä esitettyihin lukuihin nähden niin Suomessa kuin muissakin maissa.

Suomen Muoviteollisuusliitto pitää hyvänä, että PVC:n ja muidenkin käytettyjen raaka-aineiden ympäristövaikutuksia selvitetään ja jätehuoltoa kehitetään saadun tutkimustiedon pohjalta.

Seuraavassa on käyty läpi Euroopan komission PVC vihreässä kirjassa esitetyt kysymykset ja annettu kuhunkin suomalaisen muoviteollisuuden asiantuntijanäkemys.

1) Kysymyslaatikko 1 sivu 14

Stabilisaattorit : kadmium ja lyijy

Kadmium

- * Suomessa ei valmisteta kyseisiä stabilisaattoreita.
- * Euroopan stabilisaattoritoimittajat ovat ilmoittaneet voivansa tarvittaessa täysin luopua kadmiumstabilisaattoreista. Tässä ei nähdä Suomessa merkittävää ongelmaa, jos Cd-stabiloitujen tuotteiden tuonti Unionin ulkopuolelta samalla tyrehdytetään.

Lyijy

- * Suomessa ei valmisteta kyseisiä stabilisaattoreita.
- * Nykyisin saatavilla oleva tieto ja kokemus osoittavat, ettei lyijy PVC-tuotteissa edusta riskiä ihmiselle eikä hänen ympäristölleen.
- * Lyijyä osin tai kokonaan korvaavia yhdisteitä on juuri tulossa markkinoille PVC-tuotteiden valmistukseen. Myös Suomessa on tehty testituotteita. Toistaiseksi saatu kokemus on kuitenkin niukkaa ja osin ristiriitaista. Valtaosa PVC-muovituotteista on pitkäikäisiä rakennustuotteita, joiden kenttäkokeet ja muu käytännön testaus vievät jopa kymmeniä vuosia ennen, kuin niiden kestosta ja käyttökelpoisuudesta voidaan sanoa mitään varmaa.
- * Vuosittainen PVC-tuotteiden lyijyn käyttö tulisi ainakin ensi alkuun vuosittain tilastoida ja julkistaa Euroopan tasolla, jotta asian ja kehityksen seuranta olisi mahdollista.

2) Kysymys 2 sivulla 16

Ftalaatit :

- * Tässä asiassa tieteelliset riskinarvioinnit ovat jo loppusuoralla
- * Pehmitinaineteollisuus on antanut kaiken käytössään olevan tiedon Euroopan komission nimeämille tutkijayksiköille ja on valmis tekemään näin myös jatkossa.

* Jos tieteellinen riskinarviointi päättyy siihen tulokseen, että ftalaattien käytöstä aiheutuu jokin sellainen todellinen vaaratekijä, jota on pyrittävä pienentämään esim. migraatio-ohjeita tiukentamalla, noudattaa teollisuus tätä vapaaehtoiselta pohjalta.

3) Kysymys 3 sivulla 22

Mekaaninen kierrätys:

* Suomessa on ryhdytty keräämään ja uudelleen kierrättämään muoviputkia (mukaan lukien PVC-putket). Euroopan PVC-teollisuus on lisäksi sitoutunut edistämään ikkunanprofiilien kierrätystä, joita meillä ei kuitenkaan ole yleisesti käytössä eikä siten myöskään jätteenä. Muille vastaaville selkeille tuoteryhmille on kehitteillä vastaavia kierrätysohjelmia.

* Mekaanisella kierrätyksellä on kohtalaisen paljon rajoitteita kaikilla materiaaleilla.

* Teollisuus edellyttää, että kierrätysohjelmissa toimitaan jaetun vastuun periaatteella ja kaikki intressipiirit osallistuvat jollain tavoin toteutukseen.

* Uutta materiaalimerkintää ei nähdä toimivana käytännön ratkaisuna kierrätyksen kannalta. Suomessa muoviteollisuus on antanut suosituksen vapaaehtoisesta merkinnästä yleisimmille muoville (DIN 6120 pohjalta), jossa PVC:lle on oma merkkinsä. Lisäksi putkissa on yleensä selkeät yksiselitteiset merkinnät, jotka kertovat myös kierrättäjälle putken materiaalin.

* Hyvin tärkeää olisi käynnistää standardien uudelleen arviointi siten, ettei uusiomuovia suljeta ulkopuolelle eri tuotteissa

* Tehokkain ja oikeastaan ainoa toimiva tapa kierrättää on antaa uusiomuoviteollisuuden itse valita, mistä se voi tehdä kelvollisia uusia tuotteita. Suomen muoviteollisuuden uusiomuoviteollisuus on oman maamme asiantuntija tällä alueella. Kysymys 4 sivulla 23

Kadmium ja lyijy PVC:n kierrätyksessä:

* Raskasmetallit PVC:ssä ovat kiinteästi sitoutuneet muoviin ja asianmukaisessa käytössä turvallisia.

* Tämä asia tulisi tarvittaessa liittää edellä kuvattuihin ja ehdotettuihin perusteellisiin riskinarviointeihin. Jos riski raskasmetallien leviämiseen on olemassa, niin olisi suosittava kriittisissä tuotteissa suljettuja kiertoja eli tarkoittaen lähinnä valmistaa ikkunaprofiilit ikkunaprofiileiksi jne.

4) Kysymys 5 sivulla 25

Kemiallinen kierrätys:

* Suomen sijainnilla ja PVC-kertymillä ei ole kovin realistista olettaa maahan tehtävän kemiallisia kierrätyslaitoksia. Korkeintaan yksi yksikkö koko pohjoismaiden aluetta palvelemaan voisi ilmeisesti tulla kysymykseen.

5) Kysymys 6 sivulla 32

Jätteenpolto

* Vihreä kirja käsittelee tässä kohdin lähinnä sekalaisen jätteen polttoa yhdyskuntajätteenpolttolaitoksessa. Se on malli jota ei Suomessa juuri ole.

* Maassamme on sen sijaan kehitetty jätteiden jalostamista korkeatasoiseksi polttoaineeksi, jota on myyty tavallisiin uudenaikaisiin voimalaitoksiin.

Liiketoimintaa on harjoitettu maassamme menestyksellä runsaat 5 vuotta ja polttoaineen epäpuhtauksia (kuten klooria) kontrolloidaan SFS-standardin ja toimitusehtojen avulla. Ehdoton lähtökohta on se, ettei jätteiden energiahyötykäytöstä saa aiheutua ympäristölle suurempaa räsitusta kuin siitä, että energia tuotettaisiin neitseellisillä polttoaineilla.

6) Laatikko ja kysymys 7 sivulla 35

Kaatopaikka:

* Suomessa on menossa hyvin voimakas kaatopaikkojen laadullisen tason korotus ja se tulee sekä vähentämään kaatopaikkapalojen mahdollisuuksia että parantamaan suotovesien käsittelyä. Täten ei ole osoitettavissa, että PVC-muovien sijoittaminen kaatopaikalle muun biologisesti hajoamattoman jätteen mukana olisi jotenkin erityisen riskialtista tai arveluttavaa.

7) Laatikko ja kysymys 8 sivulla 36

Horisontaalistrategia PVC:stä

* Ajatus horisontaaliselvityksestä ja tieteeseen sekä tutkimukseen perustuvasta päätöksenteosta sen pohjalta on mitä kannatettavin.

* Mikä tahansa yhteen yleiseen materiaaliin kohdistuva ohjaava säädös on vaillinainen, ellei siinä ole otettu huomioon vaihtoehtojen vastaavia vaikutuksia ja tehty saman laajuisia selvityksiä niistä.

* Pelkän jätteen tarkastelu ei ole koko kuvaus materiaalin tai tuotteen ekososiaalisista dimensioista

Yhteenveto: Eteneminen vapaaehtoisen sopimuksen pohjalla

PVC teollisuus on tehnyt ja allekirjoittanut vapaaehtoisaloitteen keväällä 2000. Se pitää sisällään kaiken horisontaalitutkimuksen kattaman kysymyskentän ja vähän enemmänkin. Siinä on oleellisena osana ulkopuolisen tahon arviointi ja konkreettiset tavoitetasot.

Vapaaehtoisaloite on ainoa käyttökelpoinen tie kohti toimivaa kestävän kehityksen mukaista yhteishanketta, jossa yhdistyvät:

- * Tuotannon jatkuva parantaminen ja säilyttäminen EU:ssa
- * Muovien koostumuksen asiantuntijahallinta ja osaaminen
- * Uusioinnin ja muun hyötykäytön tehostaminen ja kasvattaminen
- * Elinkeinoelämän laajapohjainen ja aito sitoutuminen uusiin tarvittaviin infrastruktuureihin EU:n alueella

Suomen Muoviteollisuusliitto-
Finska Plastindustriförbundet r.y.

Vesa Kärhä
osastopäällikkö

Message from Thomas L. Allen

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,
Thomas L. Allen

Message from Tiziana Rizzo

Sono RIZZO Tiziana e lavoro in una società farmaceutica in Italia e vorrei esprimere una mia considerazione personale a difesa del PVC, basata sulla mia esperienza nel settore in cui opero.

E' infatti impossibile pensare di mettere in distribuzione specialità farmaceutiche in forme secche (compresse rivestite o non) se non in blister in PVC che permette la non contaminazione esterna delle compresse stesse. Inoltre non vedo grossi problemi al recupero energetico e/o al riciclo dei blister in PVC.

Vi ringrazio della Vostra attenzione e cordialmente saluto.

Tiziana RIZZO

Message from Tom Rachal

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,
Tom Rachal

Message from Treva Croker

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,
Treva Croker

Message from Veldon Messick

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 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,
Veldon Messick

Message from Victor Johnston

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,
Victor Johnston

Message from Walter Bauschenberger :

Sehr geehrter Herr Schulte-Braucks und Herr Krämer .

Ich möchte Ihnen meine positive Erfahrung mit PVC mitteilen.

Mein Haus habe ich vor einigen Jahren einer größeren Renovierung unterzogen und dabei sämtliche Fenster (Holz) gegen solche aus PVC ersetzt. Die damit erreichte bessere thermische Isolierung machte sich bereits im darauffolgenden Jahr durch weniger Heizungskosten bemerkbar. Instandsetzungsarbeiten an den Fenstern waren nicht notwendig und sind auch nicht zu erwarten, das heisst, kein Abbeizen, keine Anstricharbeit und kein Zeitaufwand, ein Vorteil für die Umwelt !

Weiters wurden alle Abfluss- und Kanalisationsrohre, welche aus Blei oder Steingut bestanden, gegen PVC-Rohre ersetzt. Beim Anblick der ausgebauten Bleirohre erfasste mich das blanke Entsetzen wie es so etwas geben kann und ich und meine Familie keine gesundheitlichen Schäden davon getragen haben. Hier kann man meiner Meinung nach ausschließlich und nur PVC-Rohre verwenden, da diese preisgünstig und leicht zu verlegen sind, keinerlei gesundheitlichen Probleme zu erwarten sind und ausserdem extrem widerstandsfähig und vor allem langlebig sind ! Besonders im Bereich der öffentlichen Hand wie Gemeinden, Städte, Länder und der Reinhaltverbände sollte der Einsatz von PVC-Rohren zwingend vorgesehen sein, da die Wirtschaftlichkeit und Langlebigkeit von PVC-Rohren unübertroffen ist.

Mit der Hoffnung, daß meine positiven Erfahrungen mit Produkten aus PVC auch Ihre Einstellung zu diesem Produkt verbessern kann, verbleibe ich

mit freundlichen Grüßen

Walter Bauschenberger

Message from Wolfgang Thelen

Herren Kramer und Shulte - Braucks

Sehr geehrte Herren,

Ich möchte mich als Gesamtbetriebsratsvorsitzender der Solvay Deutschland in der Angelegenheit „PVC“ an Sie wenden.

Ich will Sie ausdrücklich nicht, was naheliegend wäre, mit dem Thema „Sicherung der Arbeitsplätze in den PVC-Betrieben“ beschäftigen, sondern auf meine persönlichen Erfahrungen in dem Umgang mit dem Produkt „PVC“ zurückkommen. Das sind aus letzter Zeit zwei ganz wesentliche Aspekte:

1. In der lang anhaltenden Diskussion über die EXPO in Hannover und die damit verbundene ökologische Mustersiedlung hat es nach kurzer Zeit aus dem sogenannten Umweltbereich und auch von der Stadt Hannover Argumente gegeben, grundsätzlich auf PVC zu verzichten mit dem üblichen Schlagwort, Wir wollen eine PVC - freie Siedlung haben“ (damit muss man dann auch nicht mehr hinter fragen, warum man das eigentlich will). Die Diskussion mit allen an diesem Projekt Beteiligten, vor allen Dingen auch mit den Bauträgern, mit den Handwerkern, aber auch mit allen am Umweltschutz Beteiligten, hat sehr schnell ergeben, dass eine solche Forderung nicht nur nicht haltbar ist, sondern im Interesse einer ökologischen Orientierung unsinnig ist.

2. In Deutschland hat es ein beispielhaftes Projekt zum Thema „Unterbodenschutz bei Kraftfahrzeugen“ unter Beteiligung der Unternehmen Volkswagen, Teroson, Solvay, der Abfallwirtschaft, der IG Bergbau, Chemie und Energie und der IG Metall gegeben. Begleitet wurde das Projekt von der Sozialforschungsstelle der Universität Dortmund. Ziel war es, neben den ökologischen auch die beschäftigungspolitischen Aspekte einer solchen Diskussion zu diskutieren. Es ging dabei darum, inwieweit PVC anderen Werkstoffen über- oder unterlegen ist.

Die Aussagen dieses Projekts sind eindeutig pro PVC. Die Ergebnisse sind bei allen Beteiligten zu erhalten.

Beide Aktivitäten machen es meiner Meinung nach erforderlich, wegzukommen von kurzfristigen, modisch gefärbten Forderungen, die langfristigen wissenschaftlichen Untersuchungen nicht standhalten. Für mich und meine Kolleginnen und Kollegen ist es daher äußerst wichtig, dass dieser universelle Werkstoff erhalten bleibt. Alle Beteiligten sind sicher inzwischen so sensibilisiert, dass sie sich neuen Erkenntnissen nicht verschließen und davon ausgehen, dass mit jedem Werkstoff eine permanente Diskussion verbunden sein muss über Qualität - unter Berücksichtigung aller Aspekte.

Mit freundlichen Grüßen

Wolfgang Thelen
Gesamtbetriebsratsvorsitzender
- Solvay Deutschland -