

**Resolution 529/00 of the Bundesrat (Upper House of the German Parliament) of 20 October 2000**

Subject:

Green Paper from the European Commission on the environmental issues of PVC

COM(2000) 469 final; Council document 10861/00

The Bundesrat, in its 755<sup>th</sup> sitting on 20 October 2000, adopted the following opinion on the basis of Articles 3 and 5 of the Act on cooperation between the Federal and Land level in EU matters (EUZBLG):

1. The Bundesrat welcomes the Commission's intention that this Green Paper should provide a scientific basis for the controversial debate at European level on individual issues and to produce a comprehensive assessment of the plastic PVC.
2. The Commission rightly points out that in order to develop a horizontal strategy all the economic and environmental implications not only of PVC but also of potential substitutes throughout their life cycle should be assessed. The specific questions asked, however, one-sidedly place waste disposal in the foreground and take no account of integrated assessment of recycling and disposal options or of whole life cycle analysis.
3. One prerequisite for such a scientific basis is an analysis of PVC drawing no firm conclusions but addressing both its environmental disadvantages and its advantages. However, the Commission falls short of this objective of a comprehensive assessment. Instead, a critical and more discriminatory discussion of PVC predominates. In particular, the Green Paper pays only limited attention to the principles of sustainability, according to which the environmental, economic and social aspects must, as a general rule, be taken into account.
4. The recycling and disposal options are assessed in terms of "good" and "bad"; there is no discussion of an integrated approach tailored to the specific conditions based on competing recycling and disposal options.
5. Against the highly detailed appraisal of PVC (and certain additives), there are no corresponding analyses and assessments of potential alternatives. Insufficient account is taken of the risk-assessment programmes already underway on PVC additives.
6. The Bundesrat calls on the Federal Government, in the further discussions launched by the Green Paper, to work for a comprehensive assessment taking account of the abovementioned aspects.