



Vinyl Council Australia

Product Stewardship Commitment

A VOLUNTARY ENVIRONMENTAL INITIATIVE
OF THE AUSTRALIAN PVC INDUSTRY





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Statement from the Minister for the Environment and Heritage

This Product Stewardship Commitment represents a significant step forward by the Australian PVC industry. Through this Commitment, the industry is moving beyond statutory compliance and onto the path of continual environmental improvement. This is to be applauded.

The Commitment provides the industry with a powerful tool for reducing the impact of its activities on the environment and allowing it to more effectively contribute to a sustainable society.

Despite having a relatively sound environmental profile, I understand the concerns that industry has about its potential and perceived environmental and health impacts. This Commitment comes about as a result of a critical examination by the Vinyl Council of Australia of the industry's activities.

This Commitment is a starting point. It does not yet provide solutions to all issues. However, by tackling the main issues as we understand them at this time, and by committing to monitor and address emerging issues, this Commitment marks a significant and valuable step on the path to sustainability. The commitment to phase out cadmium additives is significant as is the commitment to public transparency. It allows the industry to address new issues as they arise and further develop its commitment to improved environmental performance.

The PVC industry makes a major contribution to the Australian economy. It provides up to 5,000 jobs and has annual sales revenue of \$800 million. The range of applications of PVC products is considerable, and their utility is taken for granted.

This Commitment will enable the Australian community to continue to benefit from PVC products manufactured, stored and recycled in a healthier fashion.

Few industries enjoy the advantage of being naturally environmentally friendly, and I congratulate the PVC industry for the tough decisions it has taken voluntarily as it strives toward more responsible corporate citizenship. I trust the Commitment made by your industry will provide impetus for others to similarly address their impacts on the environment.



Dr David Kemp MP The Minister for Environment and Heritage

Nature and purpose of this initiative

This Product Stewardship Commitment (the Commitment) has been prepared by the Vinyl Council of Australia in conjunction with Environment Australia. It establishes a set of voluntary public commitments on the environmental issues which may be associated with the manufacture, use and disposal of PVC products in Australia. These commitments bind the signatories to deliver specific outcomes.

This is an ongoing, long term undertaking by the Australian PVC industry to recognise and progressively address all pertinent environmental issues within responsible and deliverable time frames.

Each year, the Signatories will report progress against prior commitments, assess new issues and evidence, and prepare new or extended commitments where appropriate. These reports and updates will be posted for public access on the Vinyl Council website.

It is intended this Commitment will apply for a period of five years from the date of signing, at which time its effectiveness will be reviewed and a new Commitment entered into as may be appropriate.

Summary of commitments

| | ISSUE | TARGET | WHEN |
|----------------------------------|--|--|---|
| Production and storage | VCM emissions in PVC resin manufacture at Australian Vinyls' Laverton resins plant | <ul style="list-style-type: none"> Compliance with EPA licence standards for VCM in-plant and boundary readings Residual VCM in finished resin powder not greater than 1 ppm VCM emissions not greater than 50g/tonne PVC | <p>In force</p> <p>Immediate</p> <p>Immediate</p> |
| | Use of appropriate environmental management systems at manufacturing and storage sites | Review environmental management systems status at all signatory sites | Dec 2003 |
| The safe use of additives | Lead and cadmium stabilisers | Implement industry Code of Practice for safe use (see Commitment 2) | Immediate |
| | Phase out the use of cadmium based stabilisers | <ul style="list-style-type: none"> Tentative date for phase-out Establish final date for phase-out | <p>Dec 2003</p> <p>Dec 2002</p> |
| | Long term phase-out of lead based stabilisers | <ul style="list-style-type: none"> Review potential reduction and phase-out in all applications. Establish schedules for phase-out in applicable sectors. | Dec 2003 |
| | Phthalate plasticisers | Implement Policy Commitment (see Commitment 3) | Immediate |
| | Other additives | Monitor any pertinent overseas developments | Ongoing |
| Waste management | National Packaging Covenant | All packaging sector signatories have submitted waste management action plans under the NPC | Oct 2002 |
| | Pipe off-cuts recycling | Recovery and recycling program in cooperation with major developers | Pilot project underway |
| | Other recycling | Monitor overseas developments | Ongoing |
| | Impediments to recycling | Independent review of impediments to recycling | Dec 2002 |
| Research | | (See Commitment 5) | Ongoing |
| Public reporting | Performance against the commitments in this document | Publish annual performance report | Dec 2003 |
| | PVC life cycle impacts | Publish annual product stewardship issues review | Dec 2002 |
| | Review implementation and effectiveness of the Commitment | Publish a review and make recommendations for further commitments as appropriate | Dec 2007 |



commitment one

PRODUCTION AND STORAGE

Vinyl chloride emissions in the manufacture of PVC resin

Australian Vinyls Corporation operates Australia's only PVC resins manufacturing plant at Laverton, Victoria. The principal raw material is vinyl chloride monomer gas (VCM). VCM emissions during manufacture of PVC resin are governed under the terms of the plant's licence to operate, under the jurisdiction of the Victorian EPA.

In addition, Australian Vinyls commits to the following voluntary targets:

1. VCM retained in finished resin shipped to converters will not exceed 1ppm, consistent with best published international standard.
2. Emissions of VCM will not exceed 50g/tonne of PVC produced.

Environment management policy and procedures

Signatories will review the status of environment management policy and procedures at manufacturing and storage sites covered by this Commitment. The advice of statutory authorities will be sought where appropriate. A status report, discussion and recommendations will be included in the annual report for the year to 31 December 2003.

commitment two

CODE OF PRACTICE FOR THE USE OF LEAD AND CADMIUM STABILISERS IN PVC PRODUCTS IN AUSTRALIA

Purpose

This is a voluntary Code of Practice for the use of lead and cadmium stabilisers in PVC products manufactured in Australia by the Signatories to this Product Stewardship Commitment. It reflects the intention of Signatories who use these stabilisers to comply with its terms and oversee its implementation.

Undertakings by signatories

1. Phase out of cadmium stabilisers

The use of cadmium stabilisers is to be phased out. Signatories will make every practicable endeavour to achieve this by the end of 2003 within the constraints of technical and commercial feasibility. A final date for phase out will be advised by 31 December 2002.

Total usage of cadmium stabilisers by Signatories will be reported on an annual basis until phase-out is complete.

commitment two (continued)

2. Products in which lead stabilisers will not be used

Lead stabilisers will not be used where the available scientific evidence indicates the potential risk to human health and the environment is unacceptable. Interpretation will be by Members with the aid of advice from the Technical Steering Group (see Commitment 7). Usage of lead stabilisers will be reported annually by quantity and by major end-use product category.

3. Products from which lead stabilisers have been voluntarily withdrawn

Though the health risk is known to be very low, Signatories have voluntarily ceased using lead stabilisers in pipe specified for potable water supply.

4. Low risk products

Lead stabilisers may continue to be used in suitable applications where their use is assessed as acceptable under the terms of this code. Current examples include non-potable water pipe, electrical conduit, wire and cable.

5. Products where further assessment may be required

Where insufficient data is available to adequately determine the risk to human health and the environment, the Signatories will make appropriate endeavours to obtain the necessary data.

6. Overseas trends

The Signatories will monitor overseas initiatives and trends in:

- reduction in the usage of lead based stabilisers;
 - development of alternative stabiliser systems;
 - the disposal of lead stabilised PVC products;
 - the abatement of any environmental impacts of lead based stabilisers;
- and act on these initiatives and trends where appropriate and practicable.

7. Feasibility of phasing out the use of lead-based stabilisers

Signatories will review the feasibility of ultimately phasing out the use of lead stabilisers in all applications. A schedule for phase-out in applicable sectors will be established by December 2003.

8. Safe manufacturing practice

The Signatories are committed, as a minimum, to conformance with the requirements of WorkSafe Australia and the relevant state Codes of Practice applicable to stabiliser manufacture and their use in PVC products.

9. Australian Standards

The Signatories will comply with relevant Australian Standards and recommend inclusion of the practical outcomes of this code in relevant new standards or revisions.

10. Consultation

The Signatories will maintain appropriate contact and consultation with the regulatory, environment and health authorities and agencies, including WorkSafe Australia, Environment Australia, the State Environment Protection Agencies and the Environmental Health Council.

11. Public Reporting

The Council will report annually on the implementation of the code. This will include:

- progress made towards objectives;
- barriers to meeting objectives;
- usage of lead and cadmium stabilisers by quantity and end-use product category; and
- overseas initiatives and trends.

The report will be posted on the Vinyl Council's website. Signatories will submit the data needed by the Council for this purpose, and will provide periodic reports to the Technical Steering Group on their implementation of the code.



commitment three

POLICY FOR THE USE OF PHTHALATE PLASTICISERS IN FLEXIBLE PVC PRODUCTS IN AUSTRALIA

Purpose

This is a voluntary Policy Commitment for the use of phthalate plasticisers in the manufacture of flexible PVC products in Australia by the Signatories to this Product Stewardship Commitment. It reflects the intention of those Signatories who use these plasticisers to comply with its terms and oversee its implementation.

Whereas much scientific research has been published indicating the general safety of these plasticisers in appropriate applications, Signatories recognise that ongoing debate has caused some public concern. Accordingly, they make the following undertakings.

Undertakings by Signatories

We, the Signatories:

1. Acknowledge our responsibility to use these plasticisers only where they are reasonably and properly regarded as safe in the light of available scientific evidence on their environmental and health impacts.
2. Will cease the use of a phthalate plasticiser in any application where available scientific evidence shows it to have unacceptable health or environmental impacts.
3. Will monitor overseas developments regarding the health and environmental safety of these products.
4. Will seek the involvement of independent scientific and medical expertise where appropriate.
5. Will monitor and evaluate overseas developments in the use of PVC plasticisers.
6. Will promote the sharing of information on the above issues among Signatories and other relevant parties in Australia, including regulatory, environment and health authorities and agencies.
7. Will, through the Vinyl Council, cooperate with state and federal regulatory authorities and agencies regarding any issues associated with these plasticisers.

commitment four

WASTE MANAGEMENT

Packaging waste

Packaging waste as a major environmental issue in Australia is addressed by the National Packaging Covenant. All PVC packaging product manufacturers who are Signatories to this Product Stewardship Commitment are, at the time of this Commitment, also signatories to the covenant and have submitted action plans under that covenant. Further information may be found at www.ea.gov.au/industry/waste/covenant. A summary of progress under these action plans will be included in the annual report of this Product Stewardship Commitment.

Recycling of pipe off-cuts

The industry will work with major developers and waste managers to develop a program to recycle PVC pipe off-cuts collected at construction sites in state capital cities and made available for recycling.

A pilot project currently underway at a major development site in Sydney will provide information on the quantities of pipe off-cuts available and the viability of their separation and collection. This will help inform the feasibility and development of a targeted recycling program.

Recycling of other PVC products

The Australian PVC industry will monitor overseas developments in the recovery and recycling of PVC products with a view to assessing the prospective viability of applying similar initiatives in Australia.

Impediments to recycling

The Signatories are assisting Environment Australia in the completion of an independent, expert review of the impediments to increased recycling of PVC products in Australia. The outcomes of this review will be reported in the first annual report under this Commitment, and will help inform and prioritise the development of future recycling initiatives.

commitment five

RESEARCH

Working through the Vinyl Council and the Technical Steering Group, the Signatories will monitor national and international developments in scientific research relevant to the potential health and environmental impacts of the PVC product life cycle. Information will be shared with other Signatories and responsible authorities and agencies. Where data is required but unavailable to answer significant and material questions about the health or environmental impact of PVC products or raw materials in Australia, the Signatories will make appropriate endeavours to secure the necessary data.



commitment six

PUBLIC REPORTING

The Signatories are committed to the community's right to be informed on issues of health and the environment, and to providing appropriate undertakings and information in response to concerns about their products or operations. This Commitment is entered in this spirit.

On behalf of the Signatories, the Technical Steering Group, through the Vinyl Council, will publish:

- an annual report of progress against these commitments;
- an annual overview of the principal product stewardship issues associated with the PVC product life cycle in Australia;
- an annual update on new and revised commitments as appropriate; and
- after five years, a report on the implementation and effectiveness of the Commitment. The report may include recommendations for further action to improve environmental performance of the PVC industry, and the nature and form of further commitments.

These reports will be posted on the web sites of Environment Australia and the Vinyl Council. Environment Australia may include commentary in these reports regarding progress under this Product Stewardship Commitment.

commitment seven

TECHNICAL STEERING GROUP

The Signatories will establish a Technical Steering Group to monitor and report on the implementation of this Commitment. The Technical Steering Group will include a nominee of each Signatory, Environment Australia and at least one independent scientist with relevant expertise. A nominee may represent more than one signatory.

The Technical Steering Group will:

1. Receive and review periodic reports from Signatories on their implementation of the Commitment, including progress against commitments made in respect of:
 - emissions in manufacture;
 - the use of additives;
 - waste management; and
 - research on the potential health and environment impacts of the PVC product life cycle.
2. Monitor local and overseas trends and developments in the above and advise Signatories on the applicability of these in Australia.
3. Monitor developments and trends in the disposal of PVC products and advise on their possible adoption in Australia.

commitment seven (continued)

4. Assist and/or advise Signatories in the procurement of data pertinent to the determination of risk.
5. Meet at least twice yearly to consider the above.

The Technical Steering Group will also review the admission of new Signatories and recommend the removal of any Signatories to the Vinyl Council Board. (See page 11).

The Technical Steering Group may seek advice from relevant NGOs, other organisations and the community where appropriate.

The Technical Steering Group will nominate technical committees where appropriate to investigate or monitor nominated issues. These committees will report to the Steering Group all pertinent matters identified. The Technical Steering Group will likewise report to Signatories all pertinent matters identified.

The Signatories will provide all aid required by the Technical Steering Group to discharge its responsibilities as set out above.

At the expiration of five years from the date of signing of this Commitment, the Technical Steering Group will review the implementation and effectiveness of the Commitment.



Product Stewardship Policy of the Vinyl Council of Australia

PREAMBLE

The Vinyl Council recognises that PVC products add significant benefit to society, including environmental benefit, as a function of their excellent performance, durability and affordability. However, as with any manufactured product, there are impacts which need to be understood, characterised and addressed along the PVC product life cycle.

PRODUCT STEWARDSHIP

The Council believes that raw material suppliers, product manufacturers, product distributors and consumers are joint stewards for the safe and beneficial production, use and disposal of those products. This is what we understand by product stewardship: the shared management of the health, safety and environmental aspects of PVC products through their life cycle.

Vinyl Council Product Stewardship Policy

- The Council will assist members, relevant authorities and experts to understand, characterise and address product stewardship issues associated with the life cycle of PVC products in Australia in a manner consistent with our understanding of the values and expectations expressed by the general community.
- Members will inform the Council of any significant environmental or health safety issues coming to their attention in connection with the manufacture, use or disposal of PVC products.
- Through its website, publications and public statements, the Council will seek to keep stakeholders informed of the principal issues. This will include full and balanced reporting of issues and industry performance.
- The Council will offer leadership and guidance to member companies in addressing stewardship issues associated with their respective PVC products.

Definitions

Australian PVC Industry (the industry)

For the purpose of this document, the Australian PVC Industry is the Vinyl Council, its member companies and other PVC companies which are signatories to this Commitment.

Commitment (capitalised)

The Product Stewardship Commitment set out in this document.

Lead or cadmium stabiliser

A lead or cadmium compound used as an additive in the manufacture of PVC products to improve the thermal stability during processing and the heat and/or UV stability of the end-use product.

Members

Members of the Vinyl Council

Phthalate plasticiser

Softeners from the phthalate family of chemicals added to PVC resin to impart softness and flexibility to products requiring those attributes.

PVC (vinyl)

Polyvinyl chloride

Signatories

The Signatories to this Commitment.

Stakeholders

The PVC industry, its employees, suppliers and customers, the local and general communities, consumers, government and regulators, and any other groups significantly impacted by the industry.

Technical Steering Group

The Technical Steering Group established by the Signatories to monitor and report on the implementation of this Commitment

Vinyl Council

The Vinyl Council of Australia (the Council)



Signatories

The initial Signatories to this Commitment are listed overpage.

Admission of new Signatories

Companies engaged in the manufacture of PVC products in Australia, or supplying materials or services to manufacturers of PVC products in Australia, who are not already signatories to this Commitment but who are willing to make the commitments set out in the document, may apply to become Signatories by writing to the Technical Steering Group c/- the Vinyl Council of Australia. Applications will be reviewed by the Steering Group, which is authorised to admit the new Signatory. The application will be dealt with within 60 days and approval will not be unreasonably withheld or delayed. The name of the new Signatory organisation will be included in the list of Signatories on the Vinyl Council's website and in the following end-of-year report.

De-listing of Signatories

Signatories are expected to honour the commitments set out in this document and as may be updated in the end-of-year reports of the Technical Steering Group with the approval of the Vinyl Council Board of Directors. The names of Signatories who, in the assessment of the Technical Steering Group, have not met the commitments, and are not demonstrating committed effort to meet these commitments, may be removed from the list of signatories. The process will be as follows.

Signatories are required to supply the Technical Steering Group with the information needed for monitoring this Commitment. The Technical Steering Group will review this data for all Signatories, annually or semi-annually, at the discretion of the Technical Steering Group. Signatories who, in the view of the Technical Steering Group, are not meeting the commitments, will be advised so in writing. They will also be advised the intended timing of the next review. Any company so advised, which, at the time of the next review, in the view of the Technical Steering Group, has not demonstrated it is meeting the commitments and is unable to show adequate progress towards meeting the commitments, may be removed from the list of Signatories by the Vinyl Council Board on the recommendation of the Technical Steering Group.

The Technical Steering Group's intention to recommend removal will be advised to the Signatory not less than 60 days before approval is to be sought from the Vinyl Council Board. The Signatory may appeal the recommendation by direct representation to the Vinyl Council Board.

Should the Board decide to proceed with removal, the Signatory will be advised in writing, together with the reasons for removal. The de-listed Signatory may apply to the Technical Steering Group for re-instatement when it is able to demonstrate compliance with the Commitment. The application will be determined according to the processes provided for admission of new signatories.



Signatories

Keith Falk, Manager
Resinite Division
AEP Industries
(Australia) Pty Ltd

Weyman Belle Isle
Production Director
Allplas Extrusions Pty Ltd

Terence Condron
Manufacturing Manager
Armstrong World Industries
(Australia) Pty Ltd

Gavin Connelly
Managing Director
Australian Chemicals
& Coatings Pty Ltd

Murray Winstanley
Chief Executive Officer
Australian Vinyls
Corporation Limited

Darrell Richardson
General Manager
Bridgestone TG
Australia Pty Ltd

Anthony Madigan
Director
Cartigny Pty Limited

Greg Harrison
Managing Director
Chemson Pacific Pty Ltd

Basil Siganakis, Director
Cryo Grind (Aust) Pty Ltd

Noel Williams
Managing Director
Dow Chemical
(Australia) Limited

Glen Brachen
Managing Director
FPI Compounds Pty Ltd

Richard Havard
Managing Director
Innuva Australasia Pty Ltd

Marian Johnston
Chief Executive Officer
Iplex Pipelines Australia Pty Ltd

Craig Williams
Managing Director
Milnes Holdings Ltd

David Harris
Chief Executive Officer
The Normandy Group S.A.

Mark Stevens
General Manager
Nylex Films & Fabrics

Robert Dumas, General
Manager – Commercial
Olex Australia Pty Limited

John Chesterfield
General Manager
Chemnet Australia
Orica Chemnet

Lachlan Patton
Sales and Marketing
Manager
Peteron Plastics Pty Ltd

Andrew Summers
Regional Chief Executive Officer
Pirelli Cables Australia Limited



David Sumner
Chief Executive Officer
Plastics Industry Pipe
Association of Australia
Limited



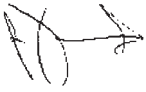
John Sharp
Managing Director
Plastral Fidene Pty Ltd



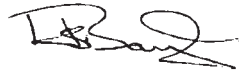
Cecil Abotomey
Managing Director
Pliant Corporation Pty Ltd



Roger Beall
Director
Polvin Compounds Pty Ltd



Ray Demczuk
Managing Director
Sun Ace Australia Pty Ltd



Tony Boyle
Managing Director
SVP Industries Pty Ltd



Kevin Toohill
General Manager
Tech Plas Extrusions Pty Ltd



George Horman
General Manager
Terminals Pty Ltd



Peter Neville
General Manager
Tyco Water Plastic
Pipeline Systems



Kevin Irwin
Chief Executive Officer
Vinidex Pty Limited



Kent Docker
Director
V.P.I. Building Products Pty Ltd



Guy Roberts
Managing Director
Welvic Australia Pty Ltd



Rob Faulkner
Executive Director
Vinyl Council of Australia



Vinyl Council Australia

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