Vinyl Council of Australia's

PVC Stewardship Program

Commitment and Verification Guide 2025

PVC STEWARDSHIP

Vinyl Council Australia

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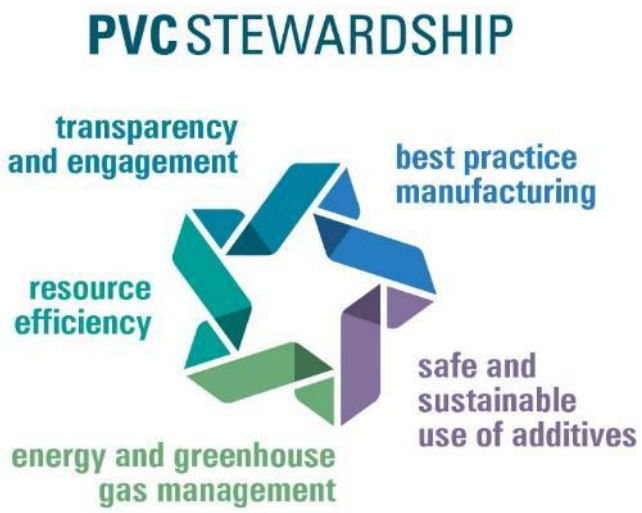
Introduction

The PVC Stewardship Program (PSP) is an on-going, long-term, voluntary undertaking by the Australian PVC industry to recognise, and progressively address, all relevant environmental, health and safety issues along the PVC product life cycle within responsible deliverable timeframes.

It is an approach that enables raw material suppliers, product manufacturers and distributors to be joint stewards of the safe and beneficial production, use and disposal of PVC products in Australia.

Each year Signatories report progress against existing commitments, assess new issues and evidence, and develop new or extended commitments if appropriate.

The PSP, which commenced in 2002, is based on five key themes associated with the life cycle of PVC:



Each theme includes a series of commitments which Signatories are required to implement and report on annually. Given the varied nature of Signatory businesses, the list of commitments applicable to each company varies depending on its activity and position in the supply chain.

Current PSP commitments and reporting requirements are detailed in this document.

PVC Stewardship Program Milestones

One of the key elements of the PSP is to seek continuous improvement of the PVC industry. Key milestones have been agreed upon in order to track continuous improvement and measure signatory's performance on a like for like basis, as follows:

Performance of Signatories (excluding first time reporters)

- All Signatories are to achieve at least 50% compliance by the end of the reporting year.
- 80% of Signatories are to achieve at least 80% compliance by the end of the reporting year.

Definitions

The Signatories to the PSP are companies engaged in the Australian PVC industry which have signed up to the PSP as an indication of their commitment to product stewardship. Signatories are categorised according to their activity within the PVC supply chain in Australia, as follows:

Resin Producer (RP)	Manufactures PVC resin sold in Australia for local manufacturing of PVC products
Resin Trader (RT)	Trades PVC resin and/or other raw materials in Australia for use by the PVC industry
Compound Manufacturer (CM)	Blends PVC resin and/or recyclate with additives to produce PVC compounds used by local manufacturers of PVC products
Additive Manufacturer (AM)	Manufacturers of additives for use by PVC compound manufacturers or converters
Additive Supplier (AS)	Trades additives produced by third party(ies) to PVC compounders or local converters
Local Converter (LC)	Manufactures PVC resins/compounds into a finished product in Australia
Fabricator (FAB)	Fabricates PVC products (i.e., sheets, profiles, tubes) into a finished products for the Australian market
Importer of Semi-Finished and Finished Goods (IFG)	Sells finished or semi-finished PVC goods manufactured overseas to the Australian market; no local PVC manufacturing operation.

Summary of Commitments and Relevance Table

Best Practice Manufacturing		
1.1	Quality Management Systems	Signatories commit to having a documented quality management system, which follows the principles of ISO 9001:2015.
1.2	Environmental Management Systems	Signatories commit to having an Environmental Management System that meets or exceeds the *Australian PVC industry's Minimum Acceptable Standard.*
1.3	Mercury Avoidance	Verify that the PVC resin contained in PVC product sold in Australia is sourced from mercury-free processes.
1.4.1	VCM Emissions (S-PVC)	Verify that VCM emissions from S-PVC manufacture are no greater than 43g/tonne S-PVC measured on a 12-month basis.
1.4.2	VCM Emissions (E-PVC)	Verify that VCM emissions from E-PVC manufacture are no greater than 500g/tonne E-PVC measured on a 12-month basis.
1.5	Residual VCM	Verify that residual VCM in supplied resin is not greater than 1ppm in 99% batches tested.
1.6	Wastes and Effluent	Verify that EDC, VCM, and PVC resin shall be sourced from closed lid production manufacturing plants that implement suitable hazardous solid waste and sludge disposal methods, and water treatment processes.
Safe and Sustainable Use of Additives		
2.1	Stabilisers and Pigments	Avoid use/supply of lead, cadmium, and hexavalent chromium additives. Any use of these additives shall be reported annually.
2.2	Recycling PVC Containing Legacy Additives	Responsibly recycle end-of-life PVC products that contain legacy additives.
2.3	Plasticisers	Comply with regulatory requirements on the use of plasticisers in flexible PVC products, avoid the use of LMW Ortho-Phthalates in sensitive applications, and provide data to VCA on any usage in the year.
2.4	Open Disclosure	Disclose information on additives used in PVC products to stakeholders upon request under conditions of commercial confidentiality, as appropriate, including any use of additives listed under the Department of Climate Change, Energy, the Environment and Water 'Chemicals of Concern' list.
Energy and Greenhouse Gas Management		
3.1	Energy and Greenhouse Gas Emissions	Demonstrate a commitment to improving the energy and greenhouse gas emission profile of PVC products.
Resource Efficiency		
4.1	Post-Industrial PVC Waste	Reduce post-industrial PVC waste sent to landfill to <2% of the total production of saleable PVC product.
4.2	Recycled PVC	Use recycled PVC in PVC products supplied to the Australian market (unless product standards and codes restrict the use of recycled materials.)
4.3	Encouraging Consumer Responsible Care	Publicly inform consumers on how to and where to reuse, recycle or dispose of the product at end-of-life safely.
4.4	Packaging Waste	Divert from landfill a minimum of 70% of all incoming or outgoing recyclable packaging materials associated with the manufacture or supply of PVC products to the Australian market; and undertake actions to encourage the recycling of packaging materials leaving the Signatory's facility.
4.5	Life Cycle Thinking	Demonstrate that impacts have been considered and addressed in the development or introduction of new PVC products for the Australian market.
Transparency and Engagement		
5.1	Acknowledgement of PSP	Demonstrate the business acknowledges to staff and its market, its commitment and obligations to the PVC Stewardship Program.
5.2	Supply Chain Mapping	Signatories commit to having a supply chain map covering all upstream PVC resin, VCM and chlorine suppliers, used in the manufacturing of their PVC product range.
5.3	Responsible Sourcing Policy	Signatories commit to having a policy that covers the organisation's fundamental principles of how it monitors and manages sourcing and procurement from suppliers.
5.4	Modern Slavery	Signatories voluntarily commit to taking reasonable efforts to investigate that there is no modern slavery in their supply chains.

#	Commitment	AM	AS	RP	RT	CM	LC	IFG	FAB
1.1	Quality Management Systems	✓	✓	✓	✓	✓	✓	✓	✓

1.2	Environmental Management Systems	✓	✓	✓	✓	✓	✓	✓	✓
1.3	Mercury Avoidance			✓	✓	✓	✓	✓	✓
1.4.1	VCM Emissions (S-PVC)			✓	✓	✓	✓	✓	✓
1.4.2	VCM Emissions (E-PVC)			✓	✓	✓	✓	✓	✓
1.5	Residual VCM			✓	✓	✓	✓	✓	✓
1.6	Wastes and Effluent			✓	✓	✓	✓	✓	✓
2.1	Stabilisers and Pigments	✓	✓			✓	✓	✓	✓
2.2	Recycling PVC Containing Legacy Additives					✓	✓	✓	✓
2.3	Plasticisers		✓			✓	✓	✓	✓
2.4	Open Disclosure						✓	✓	✓
3.1	Energy and Greenhouse Gas Emissions	✓	✓	✓	✓	✓	✓	✓	✓
4.1	Post-Industrial PVC Waste					✓	✓	✓	✓
4.2	Recycled PVC					✓	✓	✓	✓
4.3	Encouraging Consumer Responsible Care						✓	✓	✓
4.4	Packaging Waste	✓				✓	✓	✓	✓
4.5	Life Cycle Thinking	✓	✓				✓	✓	✓
5.1	Acknowledgement of the PSP	✓	✓	✓	✓	✓	✓	✓	✓
5.2	Supply Chain Mapping			✓	✓	✓	✓	✓	✓
5.3	Responsibly Sourcing Policy	✓	✓	✓	✓	✓	✓	✓	✓
5.4	Modern Slavery	✓	✓	✓	✓	✓	✓	✓	✓

Why Do We Need a PVC Stewardship Program and How Does It Work?

The PVC Stewardship Program (PSP) provides a platform from which companies within the industry can collectively identify and respond to environmental aspects of the PVC life cycle. Signatories represent all components of the industry supply chain from resin manufacturing and trading, through the supply of additives and manufacturing of the product, to recycling PVC.

The key purpose of the PSP is to seek the continuous improvement of the PVC industry. Through annual self-assessments reporting and independent audits, Signatories' compliance performance is measured and benchmarked, and the information collated to provide a measure of the industry's overall progress. Annual progress reports are made publicly available on the Vinyl Council website.

Existing Signatories are not required to answer all questions relevant to their position in the supply chain, if they have proven compliance in previous years. This is only in relation to existing commitments that do not require yearly data. New Signatories are required to answer all relevant questions.

The PSP, managed by the Technical Steering Group, is comprised of representatives from the Signatories, as well as government and the scientific community.

The PSP reports publicly each year. An independent third party verifies the annual progress report and data provided by Signatories. Results are shared with a wide range of stakeholders and the PVC Stewardship Program is reviewed periodically for improvements and to assess effectiveness. The most recent review was published in November 2022 after lengthy consultation with Signatories and external stakeholders and is available at the VCA website. The next review will be published prior to the end of 2027.

2025 Industry Progress Reporting Dates

The 2025 PVC Stewardship Annual Data Survey is due: Friday 13th February 2026 (no exceptions).

Reporting deadlines must be met. Failure to report on time or submit the data survey may adversely impact the credibility of the PSP. A Signatory's failure to comply with their PSP obligations may also lead to the removal of that Signatory from the PSP.

All data surveys are reviewed by VCA and spot-verified to ensure compliance. Where additional information is required to support a data survey, a Signatory will be given a strict timeframe or deadline which must be strictly adhered to. Failure to provide requested data on time or by the appointed deadline may result in the Signatory being marked as not compliant.

Audit System

Each year the PVC Stewardship Annual Progress Report is independently verified by a third-party auditor to ensure the quality of the report, systems, process, and competencies align with the PSP performance.

A minimum of ten Signatories will be randomly selected for third party audit each year to ensure that the statements Signatories provide in the data survey are accurate. Signatories will be notified in early 2026 if they have been selected to participate in the 2025 Annual Data Survey third party audits. Signatories selected for audit each year do not currently pay for the audit.

In 2015, the auditors found "an unacceptable gap between self-assessed compliance and audited compliance". As a result, Signatories are encouraged to conduct a more rigorous self-assessment and less over-statement of compliance. The Technical Steering Group may suggest, where self-assessment and audited assessment of compliance differs by more than 10 percent, that the Signatory will be re-audited the following year on a cost-sharing basis.

Data Survey Scoring System

Each question within the data survey has a weighted score. For each relevant commitment reported upon, a score of 3, 2, 1, or 0 will be awarded.

Score	Meaning
3	Beyond Compliance (BC)
2	Full Compliance
1	Partial Compliance
0	Non-Compliant

For example, for Commitment 5.1 '*Does your company formally acknowledge its commitment to the PVC Stewardship Program?*' the Signatory is required to report '*Yes*' or '*No*'. If the company reports '*Yes',* and provides examples and attaches evidence to confirm this, then the company will be assessed as 'compliant'. In the event the company reports '*No'* then they will be assessed as 'non-compliant'.

A partial score of 1 is also applicable in some cases.

Some commitments may be eligible for Beyond Compliance points. If a Signatory receives Beyond Compliance points, their score moves from a 2 to a 3. Beyond Compliance points are assigned when the Signatory has demonstrated or provided evidence that they have gone beyond the requirements of the commitment.

Signatory Benchmarking and Award Assessment

Signatory performance is benchmarked against all Signatories. Signatories will receive a benchmark letter from the VCA providing feedback on their company's specific performance, based on their 2025 survey results, relative to the rest of the Signatories.

Award	Award Assessment	Data Survey Score	Data Survey Score + Beyond Compliance Points
Gold Excellence	Signatories that scored full compliance in all relevant commitment areas.	100%	≥100%
Silver Commendation	Signatories who achieved a score of 100%+ including beyond compliance points, but with at least one partial compliance.	99%	≥100%
Silver	One or more non-compliance.	80% – 98%	
Bronze	Multiple non-compliances.	50% - 79%	

Signatories meeting compliance for all commitments relevant to their business are recognised through the Excellence in PVC Stewardship Award and, upon finalisation of a licensing agreement, may use the logo for 12 months to promote their achievement.

Signatories that are compliant with at least 50% of commitments relevant to their business, upon finalisation of a licensing agreement, are able and encouraged to use the PVC Stewardship logo on their marketing collateral to indicate the company is a Signatory to the PVC Stewardship Program and committed to sustainable development.

1.0 BEST PRACTICE MANUFACTURING

1.1 Quality Management Systems

Year Introduced: 2023

Commitment

Signatories commit to having a documented quality management system, which follows the principles of ISO 9001:2015.

Does This Apply To Me?

Relevant To:	Data Source:
Resin Producer (RP)	Applies to own operation.
Additive Manufacturer (AM)	
Compound Manufacturer (CM)	
Local Converter (LC)	
Resin Trader (RT)	Confirm from Tier 1 supply chain.
Additive Supplier (AS)	
Fabricator (FAB)	
Importer of Semi-Finished and/or Finished Goods (IFG)	

Confirming Compliance

Evidence of compliance should include:

- Evidence of document control procedures for corporate policies, procedures, product recipes etc., (e.g., version control, validity dates).
- Evidence of approved supplier list (and procedure for determining who is or isn't approved), at least for product related purchases (i.e., resin, additives, packaging).
- Evidence of product 'recipes' including formulation, machinery set-up / operating conditions
- Evidence of performance evaluation (including QC checks, complaint management) by Management
- Evidence of a 'corrective action' process in action that leads to continuous improvement.

Evidence Requirements *One of the following*

- ISO 9001:2015 certification; **OR**
- Documents that support the existence of the quality management system; **OR**
- A valid BEP PVC 2.0 certification that includes Optional Credit 1.3, provided the BEP scope covers the supply chain used across all PVC product ranges reported under the PSP.

1.2 Environmental Management Systems (EMS)

Year Introduced: 2002 | Years Revised: 2008 | 2012 | 2016 | 2017 | 2025

Commitment

Signatories commit to implementing an Environmental Management System (EMS) that meets or exceeds the Australian PVC industry's Minimum Acceptable Standard for Environmental Management of Manufacturing Operations.

In consideration of plastic pollution, Signatories acknowledge that leakage of plastic articles, plastic pellets, resin powder and granulated material to the environment contributes to the generation of pollution, microplastics, and litter; and commit to limiting losses to the environment from their operations by ensuring appropriate loss prevention, contamination and clean up procedures are included in the company EMS, communicated to employees, and enforced throughout the site.

Australian PVC Industry's Minimum Acceptable Standard for Environmental Management of Manufacturing Operations

The following aspects of an EMS are considered as the minimum that might be considered acceptable in terms of responsible environmental management. Under the PSP, Signatories are expected to take the steps necessary to achieve this minimum. The minimum aspects are:

- The company has a current documented **environmental policy** supported by senior management.
- The company has prepared an **environmental aspects and impacts register** identifying potential environmental aspects (an element of an organisation that has or may have an impact on the environment) and has prioritised the impacts in terms of significance.
- The company has identified **environmental compliance** requirements and documented its legal (or other) environmental obligations.
- The company has developed an action plan setting out **objectives and targets** for **environmental management programs** related to identified aspects and/or significant impacts and its legal obligations.
- The company has defined **resources, roles, responsibilities and authorities** for environmental management and communicates these to relevant personnel.
- The company has **procedures and processes** for achieving its environmental objectives and targets and to control operations and processes associated with identified significant environmental impacts.
- The company's **communications** and training programs include awareness of the company's commitment to the PSP, EMS, Environmental Policy, environmental impacts, and procedures.
- The company has identified and assessed reasonably foreseeable, potential significant **environmental, health or safety incidents** which may result from an emergency or unplanned event and has procedures in place to minimise the risk of incidents and manage impacts in the event of an incident.
- The company conducts an **environmental impacts assessment in capital expenditure projects** e.g., where a new process is adopted, a major modification is to be implemented, a major acquisition made, or assets divested.
- The company's management periodically **reviews and evaluates** its environmental management to ensure continuing effectiveness and adequacy.
- The company has **procedures or policies for communicating** its environmental performance and management to internal and external stakeholders.
- The company has **loss prevention, contamination** and **clean up procedures** to keep plastic pellets, resin powder and granulated material out of the environment.

Does This Apply To Me?

Relevant To:	Data Source:
Resin Trader (RT)	Provide evidence that at least 80% of the product (functional unit) you supply to the PVC industry or Australian end market is manufactured by companies that comply with this commitment.
Additive Supplier (AS)	
Importer of Semi-Finished and/or Finished Goods (IFG)	
Fabricator (FAB)	
Compound Manufacturer (CM)	Applies to own operation.
Additive Manufacturer (AM)	
Local Converter (LC)	
Resin Producer (RP)	

Confirming Compliance

Signatories will be considered compliant if they provide evidence of an Environmental Management System that meets or exceeds the PVC Industry's Minimum Acceptable Standard.

Evidence Requirements *One of the following*

- A valid BEP PVC 2.0 certification, provided the BEP scope covers the supply chain used across all PVC product ranges reported under the PSP; **OR**
- Evidence of a current EMS document that meets all* relevant components of the Australian PVC Industry's Minimum Acceptable Standard; **OR**
- ISO 14001:2015 certification **AND EITHER** evidence of marine pollution prevention procedures, waste containment and pollution prevention procedure* OR be a current signatory to Operation Clean Sweep.

* Additive Suppliers and Additive Manufacturers are not required to provide evidence of loss prevention, contamination and clean up procedures for plastic pellets, resin powder and granulated material.

Available Resources

- EMS Risk Matrix Template
- PSP plastic release controls checklist

Available at the Members website, under 'Useful Resources' in the 'PVC Stewardship Program Section'.

1.3 Mercury Avoidance

Year Introduced: 2010 | Years Revised: 2012 | 2016 | 2023

Commitment

The Signatories to the PSP have agreed to verify, via their suppliers, that PVC resin contained in PVC goods supplied to the Australian market is sourced from mercury-free processes.

Does This Apply To Me?

Relevant To:	Data Source:

Resin Producer (RP)	Company specific information.
Resin Trader (RT)	Confirm from supply chain.
Compound Manufacturer (CM)	
Local Converter (LC)	
Importer of Semi-Finished and/or Finished Goods (IFG)	
Fabricator (FAB)	

Confirming Compliance

Signatories will be considered compliant if mercury avoidance has been verified for 100% of the PVC products they supply to the Australian market.

Evidence Requirements *One of the following*

- Copy of your supplier's current Best Environmental Practice PVC verification certificate.
- Purchasing records indicating supplier/s plant details (name/location). Chlorine and VCM/PVC plant details can be checked against the VCA's list of plants.
- Documented confirmation from your supplier/s, that products do not contain chlorine sourced from mercury cell chlorine plants, or PVC resin sourced from acetylene carbide plants.

Available Resources

- Policy Inserts - PVC Resin

Available at the Members website, under 'Useful Resources' in the 'PVC Stewardship Program Section'.

1.4.1 VCM Emissions from Manufacturing Suspension-PVC (S-PVC)

Year Introduced: 2002 | Years Revised: 2010 | 2012 | 2016

Commitment

Signatories endeavour to ensure that total Vinyl Chloride Monomer (VCM) emissions (licensed and fugitive) resulting from manufacturing S-PVC resin for use in their products does not exceed 43 grams per tonne of S-PVC produced measured on a 12-month basis.

Does This Apply To Me?

Relevant To:	Data Source:
Resin Producer (RP)	Company specific information.
Resin Trader (RT)	Confirm from supply chain.
Importer of Semi-Finished and/or Finished Goods (IFG)	
Fabricator (FAB)	
Compound Manufacturer (CM)	Certificates of analysis and/or BEP certificate
Local Converter (LC)	

Confirming Compliance

Relevant Signatories will be considered compliant if VCM emissions resulting from resin production have been verified as less than 43g/tonne PVC for the relevant reporting year.

Evidence Requirements *One of the following*

- Written confirmation from your S-PVC supplier/s that the VCM emissions resulting from resin production are less than 43g/tonne PVC for the relevant reporting year.
- Compliant Best Environmental Practice PVC verification certificate.
- Measurement data of total annual emissions of VCM to air and water, including point source emissions and an estimate of fugitive emissions, divided by the total tonnes of S-PVC produced for the same 12-month period.

Available Resources

- Policy Inserts - PVC Resin

Available at the Members website, under 'Useful Resources' in the 'PVC Stewardship Program Section'.

1.4.2 VCM Emissions from Manufacturing Emulsion PVC (E-PVC)

Year Introduced: 2002 | Years Revised: 2010 | 2012 | 2016

Commitment

Signatories endeavour to ensure that total Vinyl Chloride Monomer (VCM) emissions (licensed and fugitive) resulting from the manufacturing of E-PVC for use in Signatories' products, will be no greater than 500 grams per tonne E-PVC measured on a 12-month basis.

Does This Apply To Me?

Relevant To:	Data Source:
Resin Producer (RP)	Company specific information.
Resin Trader (RT)	Confirm from supply chain.
Compound Manufacturer (CM)	
Local Converter (LC)	
Importer of Semi-Finished and/or Finished Goods (IFG)	
Fabricator (FAB)	

Confirming Compliance

Relevant Signatories will be considered compliant if VCM emissions resulting from the manufacturing of E-PVC, are less than 500g/tonne E-PVC for the relevant reporting year.

Evidence Requirements *One of the following*

- Written confirmation from your E-PVC supplier/s that the VCM emissions resulting from resin production are less than 500g/tonne PVC for the relevant reporting year.
- Compliant Best Environmental Practice PVC verification certificate.
- Measurement data of total annual emissions of VCM to air and water, including point source emissions and an estimate of fugitive emissions, divided by the total tonnes of E-PVC produced for the same 12-month period.

Available Resources

- Policy Inserts - PVC Resin

Available at the Members website, under 'Useful Resources' in the 'PVC Stewardship Program Section'.

1.5 Residual VCM

Year Introduced: 2002 | Years Revised: 2010 | 2012 | 2016

Commitment

Signatories endeavour to ensure that VCM retained in manufactured S-PVC or E-PVC resin used in the production of PVC products sold in Australia will not exceed 1 part per million in 99% batches tested.

Does This Apply To Me?

Relevant To:	Data Source:
Resin Producer (RP)	Company specific information.
Resin Trader (RT)	Confirm from supply chain.
Compound Manufacturer (CM)	
Local Converter (LC)	
Importer of Semi-Finished and/or Finished Goods (IFG)	
Fabricator (FAB)	

Confirming Compliance

Relevant Signatories will be considered compliant if VCM retained in manufactured resin used in the production of PVC products does not exceed 1ppm in 99% of batches tested for the reporting year.

Evidence Requirements *One of the following*

- Compliant Best Environmental Practice PVC verification certificate
- Certificates of analysis indicating rVCM is ≤1 for 99% resin batches tested.

- Written confirmation from your supplier/s that the VCM retained in manufactured resin used in the production of PVC products shipped to Australia does not exceed 1ppm in 99% of batches tested.

Available Resources

- Policy Inserts - PVC Resin

Available at the Members website, under 'Useful Resources' in the 'PVC Stewardship Program Section'.

1.6 Wastes and Effluent

Year Introduced: 2023

Commitment

- EDC and VCM, as well as PVC resin shall be sourced from closed lid production manufacturing plants and processes that implement the following strategies:
- Hazardous solid waste and sludge, which can contain organohalogens including dioxins, shall be disposed of via government-approved high temperature emission-controlled incineration. Where incineration is not available or is illegal then diversion to other beneficial uses followed by disposal to hazardous waste landfill is acceptable, provided that these processes are government approved.
- Effluents shall be treated using advanced wastewater treatment processes to prevent emissions of halogenated hydrocarbons, such as EDC and dioxins, from being released in treated effluents. Residues from those treatments shall undergo further treatment to destroy possible contaminants.

Does This Apply To Me?

Relevant To:	Data Source:
Resin Producer (RP)	Company specific information.
Compound Manufacturer (CM)	Confirm from supply chain.
Local Converter (LC)	
Resin Trader (RT)	
Fabricator (FAB)	
Importer of Semi-Finished and/or Finished Goods (IFG)	

Confirming Compliance

Signatories will be considered compliant if they can provide:

- a signed declaration from an Executive Officer of the resin supplier describing: the manufacturing process, confirming a closed lid process; the hazardous solid waste and sludge disposal method; AND the water treatment process and hydrocarbon emissions to water.
- a copy of Regulatory Licence or Permit that demonstrates government approved disposal of solid wastes and hazardous solid waste disposal certificates.
- a copy of effluent discharge Licence or Permit including hydrocarbons tested for and emission limits and description of treatment & discharge process.

Evidence Requirements *All of the following*

- Signed declaration
- Copy of regulatory licence or permit
- Copy of effluent discharge licence or permit

OR

- Compliant Best Environmental Practice PVC verification certificate

2.0 SAFE AND SUSTAINABLE USE OF ADDITIVES

2.1 Stabilisers and Pigments

Year Introduced: 2002 | Year Revised: 2006 | 2007 | 2012 | 2014 | 2020

Commitment

Signatories commit to avoid the use of lead, cadmium and hexavalent chromium additives in the manufacturing of PVC products.

Any use of additives containing lead, cadmium, or hexavalent chromium shall be reported annually, by application, in kilograms of metal.

NOTE: Externally sourced recycled PVC used by Signatories for manufacturing new products which is known to, or may contain legacy additives is excluded from the above commitments; however, Signatories are required to have evidence of the use of recycled PVC material and are required to comply with the commitment for 'Recycling PVC Containing Legacy Additives' (see below).

New Signatories to the PSP who are using additives containing lead, cadmium or hexavalent chromium, or marketing PVC products containing these additives, will agree to phase out the use of these additives within two reporting years.

Does This Apply To Me?

Relevant To:	Data Source:
Additive Manufacturer (AM)	Required to confirm if lead stabilisers have been supplied to Australian market, however, information is not recorded for compliance.
Additive Supplier (AS)	
Local Converter (LC)	Report on information relevant to local operations.
Compound Manufacturer (CM)	
Fabricator (FAB)	Required to collect information from suppliers.
Importer of Semi-Finished and/or Finished Goods (IFG)	

Confirming Compliance

Signatories will be considered compliant if evidence is shown that additives containing lead, cadmium or hexavalent chromium are not intentionally added in the manufacturing of their PVC products.

Evidence Requirements *One of the following*

- Product formulation sheets
- Purchasing documentation
- Compliant Best Environmental Practice PVC verification certificate*

*Certificate must relate to the Signatories products, and not the procurement of upstream resin.

2.2 Recycling PVC Containing Legacy Additives

Year Introduced: 2002 | Years Revised: 2006 | 2007 | 2012 | 2014 | 2017 | 2023

Commitment

Signatories commit to responsibly recycle PVC waste materials that contain legacy additives by:

- meeting relevant regulatory health and safety obligations to workers and consumers;
- ensuring products meet relevant performance requirements;
- avoiding use of PVC recyclate containing legacy additives in sensitive end use applications such as children's toys, medical devices, or food contact products.

Does This Apply To Me?

Relevant To:	Data Source:
Local Converter (LC)	Report on information relevant to local operations.
Compound Manufacturer (CM)	
Importer of Semi-Finished and/or Finished Goods (IFG)	Required to collect information from suppliers.
Fabricator (FAB)	

Confirming Compliance

Signatories will be considered compliant if they can provide evidence that they meet relevant regulatory health and safety obligations with respect to workers and customers, ensure products meet relevant performance standards, and avoid use in inappropriate applications.

Signatories that are not using PVC recyclate, and are not restricted from doing so due to standards/regulations, must still confirm compliance with this commitment. Failing to do so will result in a non-compliance.

Evidence Requirements *All of the following*

- Product formulation sheets (or equivalent documentation)
- Evidence of compliance against standards
- Evidence of staff awareness (e.g., training procedures)

2.3 Plasticisers

Year Introduced: 2002 | Years Revised: 2006 | 2007 | 2012 | 2014 | 2016 | 2017 | 2018 | 2020 | 2025

Commitment

Signatories must comply with regulatory requirements on the use of intentionally added plasticisers in flexible PVC products. Signatories manufacturing or supplying plasticised PVC products to the Australian market agree to:

- Avoid the use of Low Molecular Weight (LMW) Ortho-Phthalates (including DEHP (DOP), BBP, and DBP) in sensitive applications where restrictions apply, including food contact packaging, toys, childcare items.
- Provide annual reporting on the type and estimated quantity of LMW ortho-phthalates used (if applicable), disclose any LMW phthalates supplied into the Australian market, and provide data to VCA on factors contributing to their continued use.

Does This Apply To Me?

Relevant To:	Data Source:
Additive Supplier (AS)	Required to confirm any supply to the Australian market, however, information will not be recorded for compliance.
Local Converter (LC)	Report on information relevant to local operations.
Compound Manufacturer (CM)	
Fabricator (FAB)	Required to collect information from suppliers.
Importer of Semi-Finished and/or Finished Goods (IFG)	

Confirming Compliance

Relevant Signatories are required to confirm any supply or use of LMW phthalates supplied to the Australian market. Signatories using LMW phthalate plasticisers are required to report the type (DEHP, DBP, BBP etc.) and quantity used and provide data to VCA on factors contributing to their continued use.

Suppliers shall report type of LMW phthalates supplied to the Australian market.

Evidence Requirements *One of the following*

- Compliant Best Environmental Practice PVC verification certificate*; OR
- Purchasing documentation (purchase orders, records, policies etc.); OR
- Product technical formulation sheets

*Certificate must relate to the Signatories products, and not the procurement of upstream resin.

Available Resources

- Policy Inserts – Additives

Available at the Members website, under 'Useful Resources' in the 'PVC Stewardship Program Section'.

2.4 Open Disclosure

Year Introduced: 2006 | Years Revised: 2019 | 2020 | 2022 | 2025

Commitment

All Signatories manufacturing or marketing PVC finished products in Australia agree to disclose, upon stakeholder request, a list of additives used in the PVC products they supply.

Disclosures may be provided under conditions of commercial confidentiality, as appropriate, to protect proprietary information or intellectual property. General information on additive function and intentionally added substances should be made accessible in good faith, with more detailed disclosures available through formal mechanisms such as confidentiality agreements or non-disclosure terms when required.

Does This Apply To Me?

Relevant To:	Data Source:
Local Converter (LC)	Report on information relevant to local operations.
Importer of Semi-Finished and/or Finished Goods (IFG)	
Fabricator (FAB)	

Confirming Compliance

Signatories must demonstrate that additive information can be made available to stakeholders upon request, under appropriate confidentiality terms.

Notes:

- *Disclosure of **exact additive quantities is not required**.*
- *Proprietary ingredients may be listed using **generic descriptors** (e.g., "modifier (proprietary)") provided they are not classified hazardous substances under REACH or the Global Harmonised System (GHS).*
- *A **full internal record** of all intentionally added substances must be retained and made available during audit or where legally required.*

Evidence Requirements

BEP Pathway

- A valid BEP PVC 2.0 certification, provided the BEP scope covers the additives used across all PVC product ranges reported under the PSP.

Standard Pathway

One of the following

- A documented public or internal procedure or policy outlining how additive disclosure requests are managed;
- A sample or redacted additive summary sheet, showing general additive functions or categories (e.g. "stabiliser," "plasticiser") with proprietary elements masked or coded;

AND

Both of the Following

- A written statement from the manufacturer or supplier confirming the use or non-use of substances listed on the Department of Climate Change, Energy, the Environment and Water (DCCEEW) 'Chemicals of Concern' list.

- A disclosure request log or register, recording any actual stakeholder requests and the organisation's documented response (including whether an NDA was used).

Available Resources

- Policy Inserts – Additives

Available at the Members website, under 'Useful Resources' in the 'PVC Stewardship Program Section'.

3.0 ENERGY AND GREENHOUSE GAS MANAGEMENT

3.1 Energy and Greenhouse Gas Emissions

Year Introduced: 2012 | Year Revised: 2016 | 2021

Commitment

Signatories agree to demonstrate the Australian PVC industry's commitment to improving the energy and greenhouse gas emission profile of PVC products.

Signatories commit to:

1. A formal focus on improving the energy and greenhouse gas emission profile of their business and the PVC products they make and supply, over an appropriate timeframe.
2. Encourage major suppliers in their supply chain to improve, through cost effective measures, the energy/greenhouse gas emissions associated with their products /services.
3. Considering the potential of available recycled post-consumer PVC to reduce the carbon footprint of their products.
4. Report progress annually.

Does This Apply To Me?

Relevant To:	Evidence Required:
Resin Producer (RP)	Evidence requirement 1
Additive Manufacturer (AM)	
Additive Supplier (AS)	Evidence requirement 2
Resin Trader (RT)	
Compound Manufacturer (CM)	Evidence requirements 1 & 2
Local Converter (LC)	
Importer of Semi-Finished and/or Finished Goods (IFG)	
Fabricator (FAB)	

Confirming Compliance

Evidence Requirements *Refer to 'Does This Apply To Me?' section for relevance*

To be considered compliant, Signatories must provide evidence of the following documentation:

1 Formal energy policy, evidence of measurement of annual energy usage, and energy usage improvement plan for your own organisation.

2 Evidence from at least one major supplier of one of the following:

- Formal energy policy or certification (e.g., ISO 50001:2018, ISO 14064-1:2018).
- Published public report on greenhouse gas emission reductions (e.g., ESG report etc.).
- Confirmation the supplier is a binding signatory to carbon reduction agreement (carbon disclosure, climate action plan, science-based target etc.)

4.0 RESOURCE EFFICIENCY

4.1 Post-Industrial PVC Product Waste

Year Introduced: 2015 | Year Revised: 2016

Post-Industrial PVC Waste: All PVC product waste directly arising from the reporting Resin, Compounder or Converter Signatory's manufacturing process of PVC products at a facility in Australia, which cannot be directly fed back into the manufacturing process, and will be required to go either through a third-party for reprocessing or be disposed of in landfill.

Commitment

Signatories seek to minimise the quantity of post-industrial PVC (product) waste requiring landfill disposal. Signatories agree to:

- Measure the quantity of post-industrial PVC waste sent to landfill as a percentage of total production of saleable PVC product (resin, compound or end-product).
- Achieve a landfill reduction target of <2 percent of post-industrial PVC waste sent to landfill against the total production of saleable product.

Signatories are to implement an improvement plan the following year where the reported figure is greater than 2 percent during the year of reporting.

Does This Apply To Me?

Relevant To:	Data Source:
Local Converter (LC)	Data from Australian operations only.
Compound Manufacturer (CM)	
Fabricator (FAB)	
Importer of Semi-Finished and/or Finished Goods (IFG)	Required to collect information from suppliers.

Confirming Compliance

Signatories are required to provide the ratio of post-industrial PVC waste to the saleable PVC product manufactured.

Evidence Requirements *One of the following*

- A valid BEP PVC 2.0 certification, provided the BEP scope covers the supply chain used across all PVC product ranges reported under the PSP;

OR

- Document used to calculate the ratio, including total quantity of post-industrial PVC waste and total quantity of saleable PVC product manufactured.

4.2 Recycled PVC

Year Introduced: 2015 | Year Revised: 2016

Recovered PVC Waste ('Recycled PVC'): Any PVC waste recovered from external sources for reuse/recycling, including PVC waste arising from manufacturing, fabrication, installation, repair, maintenance and end-of-life. Recycled PVC is purchased and/or collected from outside of the Signatory's operations and is used in the manufacture of new products. Examples of recycled PVC include, but are not limited to, end-of-life products collected through take-back schemes, industrial waste collected from another unrelated manufacturer, and installation off-cuts collected via the building industry.

Commitment

Signatories agree to use recycled PVC in products they supply to the Australian market except where Australian Standards or regulations prohibit the use of recycled material.

Does This Apply To Me?

Relevant To:	Data Source:
Local Converter (LC)	Report data relevant to product being manufactured.
Compound Manufacturer (CM)	Report data relevant to PVC recyclate sold to Signatories and non-Signatories
Importer of Semi-Finished and/or Finished Goods (IFG)	Required to collect information from suppliers relevant to imported products.
Fabricator (FAB)	

Confirming Compliance

To achieve compliance, Signatories are required to report annual consumption of recycled PVC.

Evidence Requirements

- Report recycled PVC consumption (in kg) through recycled PVC purchase documentation (purchase orders, records etc.) or documented confirmation from suppliers.

NOTE: Where recyclate cannot be used because of restrictions by standards, codes or regulations, evidence of the relevant standards, codes or regulations shall be provided. In this case, Signatories (excluding food-contact packaging manufacturers/importers) shall demonstrate compliance with this commitment through at least one of the alternative pathways, namely by agreeing to:

- Offer contractual agreements with their customers for extended supplier responsibility. These contracts shall entail arrangements to take product back at the end of the product's in-use phase for some form of recycling or reuse. Producers shall demonstrate that they have established the capacity to deliver the terms of the extended supplier responsibility contract.

- Show existing contractual agreements with recycling and waste transport service providers for the collection of end-of-life product and delivery of that product to a recycling service

provider or the manufacturer, or another third party that will reuse or recycle the material. Agreements must service at least two or more Australian capital cities that demonstrate that adequate geographic coverage exists to recover domestically sold end-of-life product.

If standards, codes or regulations are not provided or do not apply to a Signatories product range*, the Signatory will be deemed non-compliant regardless of compliance status to the alternative pathway.

* *Product ranges making up less than 5% of a Signatories total sales volume (in kg) that are manufactured using the same formulation as a product restricted by standards, codes or regulations are not to be included in the compliance evaluation.*

4.3 Encouraging Consumer Responsible Care

Year Introduced: 2015 | Year Revised: 2016

Commitment

Signatories agree to make information publicly available, such as through company websites, SDSs or other appropriate media, pertinent to the final consumer of their products, on how to and where to reuse, recycle or dispose of their product safely at end-of-life.

Does This Apply To Me?

Relevant To:	Data Source:
Local Converter (LC)	Data from Australian operations only. Must be applicable within Australia.
Importer of Semi-Finished and/or Finished Goods (IFG)	
Fabricator (FAB)	

Confirming Compliance

To demonstrate compliance, Signatories will provide evidence of the required information being publicly disseminated.

Evidence Requirements		*One of the Following*
• A valid BEP PVC 2.0 certification, provided the BEP scope covers the supply chain used across all PVC product ranges reported under the PSP;	*OR*	• Publicly available information on suitable end-of-life management of products (e.g., information on take-back programs, recycling locations, or disposal methods, available on Signatory website).

Available Resources

- Consumer Responsible Care – Policy Insert Guide

Available at the Members website, under 'Useful Resources' in the 'PVC Stewardship Program Section'.

4.4 Packaging Waste

Year Introduced: 2015 | Year Revised: 2020

Packaging Waste: All 'business to business' packaging waste arising from products and materials coming into a Signatory's facility (such as plastics, wood, metals etc.).

Recyclable Packaging Waste: Packaging materials/waste for which there is a viable and existing collection/recycling service. It excludes packaging waste which is classified as Prescribed Waste.

Commitment

Signatories agree to:

- Achieve a 70% recycling/landfill diversion rate of waste generated from **incoming recyclable packaging** materials related to the manufacture or supply of PVC products.
- Undertake actions to encourage the recycling of packaging material leaving their facility, such as product packaging design for recyclability, labelling of packaging materials, packaging material efficiency, packaging take-back programs etc.

Does This Apply To Me?

Relevant To:	Data Source:
Additive Manufacturer (AM)	Data from Australian operations only.
Local Converter (LC)	
Importer of Semi-Finished and/or Finished Goods (IFG)	
Fabricator (FAB)	
Compound Manufacturer (CM)	

Confirming Compliance

To demonstrate compliance, Signatories will:

- Identify the packaging waste types coming into the facility using the Packaging Waste form included in the survey report on whether they are being reused, recycled/reprocessed, directed to waste to energy facility or landfilled.
- Report on actions undertaken to encourage or facilitate the recycling of packaging material leaving their facility.

And choose one of the following options (incoming or outgoing waste):

- Estimate the proportion of the total amount of **incoming** packaging materials diverted from landfill and confirm if it is more or less than 70% *(Please note that non-recyclable packaging such as those deemed to be classified as prescribed waste by relevant State regulators should **not** be included in the analysis).*
- Estimate the proportion of the total amount of **outgoing** packaging materials diverted from landfill and confirm if it is more or less than 70%.

Evidence Requirements

Pathway 1: BEP 2.0

- A valid BEP PVC 2.0 certification that includes Optional Credit 6.5, provided the BEP scope covers the supply chain used across all PVC product ranges reported under the PSP.

Pathway 2: Data Reporting

Both of the following

- Reporting sheet, identifying types of incoming packaging waste generated by your PVC-related operations
- Document used to calculate/estimate **incoming** packaging waste landfill diversion* rate; **OR**

- Documentation to demonstrate actions undertaken to encourage or facilitate recycling of packaging material (e.g., recovery/diversion arrangements)

AND

- Document used to calculate total estimated weight and estimated diversion* rate of the **outgoing** packaging; **AND**
- Written confirmation from two key waste contractors confirming recovery and end solution (diversion from landfill) of relevant packaging materials or evidence of take-back by the Signatory or contracted third party for recycling/reuse.

**Either mass or volume estimates may be used to estimate the diversion rate. Signatories do not have to measure mass or volume to comply, providing they complete the survey form.*

NOTE: Some Signatories to the PSP are likely to be captured by the Australian Packaging Covenant, managed by the Australian Packaging Covenant Organisation (APCO). APCO has established an obligation for certain parties to act "to reduce environmental degradation arising from the disposal of used packaging and conserve virgin materials through the encouragement of reuse and recycling of used packaging materials". Each State jurisdiction is responsible for developing and implementing appropriate legislative frameworks to achieve this as the Federal Government does not have the power to impose penalties for non-compliance. To ascertain if your organisation is liable to comply with obligations set out under this framework, we recommend you familiarise yourself with the Legislation which can be found here, as well as the relevant State-based regulations.

To this end the Vinyl Council will seek additional information via the annual survey which Signatories may elect to respond to and which, subject to responses, may establish a basis with which to demonstrate fulfilment of your legal obligations as they relate to the APCO framework.

Broadly speaking Signatories will be asked to confirm in writing:

1. That the materials used in packaging for which the Signatory (brand owner) is responsible are recovered at a recovery rate for an operational year of at least 70% (weight basis); or

If condition 1 above is **not** met, then an equivalent amount of packaging materials that are of a similar type as the packaging for which the brand owner is responsible (above) are diverted from landfill to attain the minimum 70% recovery rate; and that

2. The Signatory confirms it has records available (to be supplied upon request if audited by the VCAs independent third-party auditor) which shows the quantity (on weight basis) and material type of

consumer packaging for which it is responsible and which are sold or distributed nationally and its eventual fate (i.e., reused, recycled etc).

3. If compliance is to be met via pathway 2 above then the Signatory confirms it has records available (to be supplied upon request if audited by the VCAs independent third-party auditor) which shows the quantity (on weight basis) and material type of incoming packaging for which it is responsible and its eventual fate (i.e., reused, recycled etc).

NB – for evaluation purposes no scores will be awarded in relation to the above when assessing compliance for the above questions.

4.5 Life Cycle Thinking (LCT)

Year Introduced: 2002 | Years Revised: 2010 | 2012 | 2016

Commitment

Signatories developing or introducing a new PVC-related product to the Australian market agree to adopt life cycle thinking, i.e., to consider the whole-of-life of that product, taking into account its end-of-life and appropriate waste management options.

Does This Apply To Me?

Relevant To:	Data Source:
Additive Manufacturer (AM)	Report on information relevant to local operations.
Local Converter (LC)	
Additive Supplier (AS)	Report on how life cycle of a product was assessed prior to releasing it in Australia (e.g., its compliance with PSP commitments) and collect relevant information from suppliers.
Importer of Semi-Finished and/or Finished Goods (IFG)	
Fabricator (FAB)	

Confirming Compliance

Signatories will be considered compliant if they can demonstrate that whole-of-life impacts have been considered in the development of new PVC-related products. This includes the consideration of one or more environmental impact. Aesthetic changes to an existing product line are not considered as a new product.

Evidence Requirements

- Confirmation of development or introduction of a new product/s

And one of the following

- Evidence of a sustainability matrix or assessment framework on the product
- Product-specific Life Cycle Assessment
- Documentation showing evidence that environmental aspects were considered (e.g., design criteria, supply chain questionnaire, meeting minutes)

5.0 TRANSPARENCY AND ENGAGEMENT

5.1 Acknowledgement of the PSP

Year Introduced: 2014 | Years Revised: 2016 | 2017 | 2020 | 2023

Commitment

Signatories are able to show that they have formally acknowledged participation and commitment to the PVC Stewardship Program. The business communicates its participation to staff and/or the market and acknowledges its commitment and obligations to the PVC Stewardship Program.

Does This Apply To Me?

Relevant To:
Resin Trader (RT)
Resin Producer (RP)
Additive Supplier (AS)
Additive Manufacturer (AM)
Compound Manufacturer (CM)
Fabricator (FAB)
Local Converter (LC)
Importer of Semi-Finished and/or Finished Goods (IFG)

Confirming Compliance

Ensure that the company's commitment to the PVC Stewardship Program is explicitly referenced in relevant management documents, policies, procedures and/or marketing.

Evidence Requirements *One or more of the following*

- Company policy (e.g., Environmental, Quality, and/or OH&S policy statements).
- Staff induction training procedures.
- Job descriptions.
- Annual or sustainability reports.
- Procurement policies.

Available Resources

- Policy Insert - Acknowledgement

Available at the Members website, under 'Useful Resources' in the 'PVC Stewardship Program Section'.

5.2 Supply Chain Mapping

Year Introduced: 2023

Commitment

Signatories commit to having a supply chain map covering all upstream PVC resin, VCM and chlorine suppliers, including names of all entities in the supply chain, which are used in the manufacturing of the Signatory's PVC product range.

Does This Apply to Me?

Relevant To:
Resin Trader (RT)
Resin Producer (RP)
Compound Manufacturer (CM)
Fabricator (FAB)
Local Converter (LC)
Importer of Semi-Finished and/or Finished Goods (IFG)

Confirming Compliance

Signatories will be considered compliant if they can provide evidence of a supply chain map and confirmation from their upstream suppliers of the plants and locations for the PVC resin, VCM and chlorine they source directly and/or indirectly.

Evidence Requirements *One of the following*

- A valid BEP PVC 2.0 certification, provided that the BEP scope covers the supply chain used across all PVC product ranges reported under the PSP;

OR

- Supply chain map covering the entirety of the Signatory's PVC product range; **AND**
- Confirmation from upstream suppliers (where applicable) of the plant names and locations for PVC resin, VCM and chlorine.

Available Resources

- Supply Chain Mapping Tool

Available at the Members website, under 'Useful Resources' in the 'PVC Stewardship Program Section'.

5.3 Responsible Sourcing Policy

Year Introduced: 2023

Commitment

Signatories commit to having a formal, written Responsible Sourcing Policy that is relevant to the organisation and their PVC-related product range(s), and that follows the principles associated with the commitments set out under the PVC Stewardship Program.

Does This Apply to Me?

Relevant To:
Resin Trader (RT)
Resin Producer (RP)
Additive Supplier (AS)
Additive Manufacturer (AM)
Compound Manufacturer (CM)
Fabricator (FAB)
Local Converter (LC)
Importer of Semi-Finished and/or Finished Goods (IFG)

Confirming Compliance

Signatories will be considered compliant if they can provide evidence of a policy that outlines the organisation's fundamental principles of how it monitors and manages the sourcing and procurement of raw materials and inputs and expects its suppliers to conduct their business, including, for example:

- compliance with all applicable laws
- implementation of policies to maintain business integrity
- respect of human rights / protection against Modern Slavery
- avoidance of cause or contribution to adverse human rights or environmental impacts through its activities/commitments, such as those presented within the PVC Stewardship Program, and
- addressing such impacts when they occur

The Policy must be signed by the organisation's Executive Officer.

Evidence Requirements *One of the following*

- A valid BEP PVC 2.0 certification that includes Optional Credit 1.2, provided the BEP scope covers the supply chain used across all PVC product ranges reported under the PSP; **OR**
- A copy of the Responsible Sourcing Policy signed by the organisation's Executive Officer.

Available Resources

- Responsible Sourcing Policy Basic Guide

Available at the Members website, under 'Useful Resources' in the 'PVC Stewardship Program Section'.

5.4 Modern Slavery (MS)

Year Introduced: 2019 | Year Revised: 2020 | 2023

Commitment

Signatories voluntarily commit to taking reasonable efforts to investigate the risk of modern slavery within their organisations and in their supply chains, and take action to address if required.

Does This Apply To Me?

Relevant To:
Resin Producer (RP)
Resin Trader (RT)
Compound Manufacturer (CM)
Additive Manufacturer (AM)
Local Converter (LC)
Additive Supplier (AS)
Importer of Semi-Finished and/or Finished Goods (IFG)
Fabricator (FAB)

Confirming Compliance

Signatories will be considered compliant if they can provide evidence of a Modern Slavery statement that follows guidance from the Modern Slavery Act 2018, which states a Modern Slavery Statement must:

- Identify the reporting entity
- describe the reporting entity's structure, operations and supply chains
- describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls
- describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes
- describe how the reporting entity assesses the effectiveness of these actions, and
- describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement

**Signatories meeting the legislative reporting threshold must comply with the legislative guidelines.*

Evidence Requirements	*One of the following*
• A valid BEP PVC 2.0 certification that includes Optional Credit 1.4; **OR**	• Modern Slavery Statement that complies with the Australian legislation.

Available Resources

- Modern Slavery Guided Example Statement
- Modern Slavery – Useful Resources

Available at the Members website, under 'Useful Resources' in the 'PVC Stewardship Program Section'.