

**Vinyl Council of Australia's
PVC Stewardship Program
Commitment and
Verification Guide 2022**





Vinyl Council Australia

ABN 85 083 012 533
1.02 Junction Business Centre
22 St Kilda Rd, St Kilda VIC, 3182

+61 3 9510 1717

www.vinyl.org.au
info@vinyl.org.au

Introduction	4
PVC Stewardship Program Milestones	5
Definitions.....	5
Summary of Commitments and Relevance Table	6
Why Do We Need a PVC Stewardship Program and How Does It Work?	8
2022 Industry Progress Reporting Dates	8
Audit System	9
Data Survey Scoring System	9
Signatory Benchmarking and Award Assessment	10
1.0 BEST PRACTICE MANUFACTURING	11
1.1 Acknowledging the PVC Stewardship Program	11
1.2 Environmental Management Systems (EMS)	12
1.3 Mercury Avoidance.....	14
1.4.1 VCM Emissions from Manufacturing Suspension-PVC (S-PVC)	15
1.4.2 VCM Emissions from Manufacturing Emulsion PVC (E-PVC).....	16
1.5 Residual VCM	17
1.6 Life Cycle Thinking (LCT)	18
1.7 Modern Slavery (MS)	19
2.0 SAFE AND SUSTAINABLE USE OF ADDITIVES	20
2.1 Stabilisers and Pigments	20
2.2 Recycling PVC Containing Legacy Additives.....	21
2.3 Plasticisers.....	22
2.4 Open Disclosure	23
3.0 ENERGY AND GREENHOUSE GAS MANAGEMENT	24
PVC Industry Commitment on Energy and Greenhouse Gas Emissions	24
4.0 RESOURCE EFFICIENCY.....	25
4.1 Post-Industrial PVC Product Waste	25
4.2 Recycled PVC.....	26
4.3 Encouraging Consumer Responsible Care	28
4.4 Packaging Waste	29

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	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

Best Practice Manufacturing		
1.1	Acknowledgement of the PSP	Demonstrate the business acknowledges to staff and its market, its commitment and obligations to the PVC Stewardship Program.
1.2	Environmental Management Systems	Signatories commit to having an Environmental Management System that meets or exceeds the <i>Australian PVC industry's Minimum Acceptable Standard</i> .
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	Life Cycle Thinking	Demonstrate that impacts have been considered and addressed in the development or introduction of new PVC products for the Australian market.
1.7	Modern Slavery	Signatories voluntarily commit to taking reasonable efforts to investigate that there is no modern slavery in their supply chains.
Safe and Sustainable Use of Additives		
2.1	Stabilisers and Pigments	Avoid use/supply of lead, cadmium, and hexavalent chromium additives. New Signatories still using these additives will agree to phase out within two reporting years upon joining the PVC Stewardship Program. 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 and agree to voluntary phase-out of LMW phthalates.
2.4	Open Disclosure	Disclose information on additives used in PVC products to stakeholders upon request, 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.

Relevance Table

#	Commitment	AM	AS	RP	RT	CM	LC	IFG	FAB
1.1	Acknowledgement of the PSP	✓	✓	✓	✓	✓	✓	✓	✓
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	Life Cycle Thinking	✓	✓				✓	✓	✓
1.7	Modern Slavery	✓	✓	✓	✓	✓	✓	✓	✓
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	✓				✓	✓	✓	✓

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.

2022 Industry Progress Reporting Dates

The 2022 PVC Stewardship Annual Data Survey is due: Friday 17th February 2023 (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 2023 if they have been selected to participate in the 2022 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 has introduced a requirement that where self-assessment and audited assessment of compliance differs by more than 10 percent, 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	Compliant
1	Partially Compliant
0	Non-Compliant

For example, for Commitment 1.1 ‘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 2022 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 that scored more than 100 points including beyond compliance points, and received no more than 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 are licensed to use the logo for 12 months to promote their achievement.



Signatories that are compliant with at least 50% of commitments relevant to their business are licensed 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 Acknowledging the PVC Stewardship Program

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

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.
- Procurement policies.
- Publicly displayed Signatory certificate.
- Company website and/or marketing material.
- Job descriptions.
- Annual or sustainability reports.

1.2 Environmental Management Systems (EMS)

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

Commitment

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

In consideration of marine plastic pollution, relevant Signatories commit to keep plastic pellets, resin powder and granulated material out of the environment 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 the 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. Within this, Signatories are required to have marine pollution prevention procedures in place to keep plastic pellets, resin powder and granulated PVC used during the manufacture of PVC products out of the environment.

Evidence Requirements

One of the following

- Evidence of a current EMS document that meets **all*** relevant components of the Australian PVC Industry's Minimum Acceptable Standard.
- ISO 14001:2015 certification **AND** evidence of marine pollution prevention procedures* **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

- Environmental Policy Template
- EMS Template (and step-by-step guide to implementation)
- EMS Risk Matrix (for Signatories without manufacturing, storage, or transport operations)

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

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 98% (by weight) 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 representing **at least 98%** of your PVC products, that products do not contain chlorine sourced from mercury cell chlorine plants, or PVC resin sourced from acetylene carbide plants.

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.

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. Confirm from supply chain.
Resin Trader (RT)	
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.

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

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.

1.6 Life Cycle Thinking (LCT)

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

Commitment

Signatories developing or introducing a new PVC 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 products. This includes the consideration of one or more environmental impact.

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)

1.7 Modern Slavery (MS)

Year Introduced: 2019 | Year Revised: 2020

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:	Data Source:
Resin Producer (RP)	Applies to own operation <u>and</u> Tier 1 upstream supply chain.
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 an acceptable Modern Slavery Statement or equivalent certification (where appropriate).

Evidence Requirements

One of the following

- Modern Slavery Statement that complies with the Australian legislation if applicable, or with the Proforma statement
- Global GreenTag certification encompassing its Modern Slavery Transparency Declaration

Available Resources

- Guidance for Statement Preparation
- Policy Insert
- Letter Template
- Questionnaire Template

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

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 will not be 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

2.2 Recycling PVC Containing Legacy Additives

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

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 recycle 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)	

Confirming Compliance

Relevant 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.

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

Commitment

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

- Avoid the use of ortho-phthalate plasticisers in PVC food contact packaging film supplied to the Australian market;
- Agree to a voluntary phase out of Low Molecular Weight Ortho-Phthalates DEHP (DOP), BBP and DBP in all PVC applications in Australia by the end of 2023 within the constraints of technical and commercial feasibility. Signatories using these LMW phthalates shall report the type and quantity range of LMW phthalates used annually. Signatories supplying LMW ortho-phthalates for PVC applications shall report the type supplied.

NOTE: Disclosure of exact amounts of each low molecular weight ortho-phthalate used is not required as this is proprietary, commercially sensitive information.

Does This Apply To Me?

Relevant To:	Data Source:
Additive Supplier (AS)	Required to confirm whether LMW phthalates have been supplied 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 planned phase out date. Suppliers shall report type of LMW phthalates supplied to the Australian market.

Evidence Requirements

One of the following

- Purchasing documentation (purchase orders, records, policies etc.)
- Product technical formulation sheets

2.4 Open Disclosure

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

Commitment

All Signatories manufacturing or marketing PVC finished products in Australia agree to disclose to stakeholders, upon request, a list of the additives used in the PVC products they supply by providing general information on additives used, including a list of all substances intentionally added.

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 can confirm compliance by showing the availability of one or more documents declaring intentionally added substances used in their PVC products, including confirmation of any use/non-use of 'chemicals of concern' "prioritised for future regulatory control" [by the Department of Climate Change, Energy, the Environment and Water \(DCCEEW\)](#).

NOTES:

- *Disclosure of exact amounts of each additive used is not required as this is proprietary, commercially sensitive information.*
- *Where one or more specific additive intentionally added is considered to be commercially sensitive intellectual property for the product formulation, the additive may be referred to using a generic term or descriptor (e.g., 'stabiliser'/'modifier' etc.) and marked "(Proprietary Information)", rather than giving the specific chemical name in the product specification sheet. However, the listing should confirm that the substance is not a classified hazardous substance (reference REACH Substances of Very High Concern and/or Global Harmonised System classifications).*
- *A full disclosure of all additives used in the product must be given in an alternative confidential document for instances where the Signatory deems it necessary or appropriate to disclose all chemicals*

Evidence Requirements

All of the following

- Readily available information sheet declaring all additives used (e.g., product safety/technical data sheet)
- Written confirmation from manufacturer/s confirming the use/non-use of chemicals contained within [DCCEEW's 'Chemicals of Concern' list](#)

3.0 ENERGY AND GREENHOUSE GAS MANAGEMENT

PVC Industry Commitment on 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 and 2
Local Converter (LC)	Evidence requirements 1, 2 and 3
Importer of Semi-Finished and/or Finished Goods (IFG)	
Fabricator (FAB)	

Confirming Compliance

To be considered compliant, Signatories must provide evidence of the following documentation, where relevant to their position in the supply chain (*refer to ‘Does This Apply To Me?’ section for relevance*).

Evidence Requirements

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.).
3. Compliance with ‘Recycled PVC’ commitment, where relevant.

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)	

Confirming Compliance

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

Evidence Requirements

- 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 by local Converters or Suppliers of imported PVC products to the Australian market, 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.
Importer of Semi-Finished and/or Finished Goods (IFG) Fabricator (FAB)	Required to collect information from suppliers relevant to imported products.

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.
- Evidence of VinylCycle verification of recycled PVC content

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 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

- Pertinent documentation, such as a Material Safety Data Sheet (MSDS)
- Relevant marketing collateral
- Website links to pertinent pages on the Signatory's website
- Evidence of take back programs operated by the Signatory

Available Resources

- Consumer Responsible Care Template

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

Both of the following

- Reporting sheet, identifying types of incoming packaging waste generated by your PVC-related operations
- Supporting documentation to demonstrate actions undertaken to encourage or facilitate recycling of packaging material (e.g., waste recovery and diversion arrangements, signage, packaging take-back programs)

AND

- Document used to calculate/estimate **incoming** packaging waste landfill diversion rate

OR

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

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 at apco.org.au/the-australian-packaging-covenant 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/non-compliance for the above questions.