

REGULATORY REFORM

U.S. Environmental Protection Agency (EPA) must end the use of non-governmental, non-consensus standards in setting product procurement policies through its Environmentally Preferable Purchasing program (EPP).

THE ASK

- Send a letter to Administrator Scott Pruitt asking EPA to alter significantly or retract its “Recommendations of Specifications, Standards, and Ecolabels for Federal Purchasing” policy developed under its Environmentally Preferred Purchasing (EPP) program.

THE WHY

- Regulatory reform is essential for the vinyl industry and a more sustainable society. Today, only a few insiders – not the public – get to determine which materials are more sustainable and, therefore, which products government agencies can select. Sustainability is about doing more with less: better environmental and natural resource stewardship in balance with economic and social due diligence. Considering the full social, environmental, and economic implications of EPA’s actions will enable all to make more informed decisions. EPA’s current EPP policy process circumvents traditional rulemaking, often inhibiting a full and balanced consideration of these life-cycle factors.
- The vinyl industry is committed to addressing sustainable development across our industry, targeting the specific areas where we can make the most impact. With 10 billion people expected to live on the planet by 2050 and the underlying need to do more with less in light of depleting natural resources, vinyl is a material of choice for the many market segments served by our industry.

THE FACTS

- PVC production has increased 92% since 1987, yet vinyl chloride emissions have decreased 83% in that same time period. The vinyl industry’s injury rate is 1/4 the rate of the chemical industry and 1/7 of the rate of overall manufacturing.

PROBLEM

EPA’s EPP program and related policies are harming the growth and health of the U.S. vinyl industry. Its “Recommendations of Specifications, Standards, and Ecolabels for Federal Purchasing,” is a culmination of 2-plus years of staff effort without seeking public comments on the document. EPA accepts unscientific and non-consensus-based criteria for ecolabels in its government procurement policies. The recommendations incorporate parts of private non-governmental, non-consensus standards that have anti-PVC policies. The 350,000 employees at 3,000 vinyl processors and fabricators in the U.S. have had no voice in this matter. EPA has refused to consider the industry’s concerns with their policies.

As an industry, we are committed to sustainability. We work to continuously improve and protect the environment, the safety of our employees, the communities in which we operate, and the customers we serve. EPA’s ongoing EPP program, however, which often is driven by vinyl competitors and non-governmental organizations, is affecting the ability of U.S. vinyl industry manufacturing to grow.

EPA has a misplaced priority in allocating significant resources to a program without statutory authority that essentially gives the government the power to pick winners and losers in the marketplace.