

ACTION ALERT

THE ISSUE:

The Food and Drug Administration (FDA) is currently considering whether to allow the use of PVC plastic (Polyvinyl Chloride) as a food packaging material. This will greatly increase the pollution from our trash. Yet, FDA is considering waiving the requirement to undertake an Environmental Impact Statement (EIS), a study of the environmental consequences.

WHAT IS PVC?

PVC is a plastic compound that is a known carcinogen to humans. It is used for construction materials and supplies and for some non-food containers. Recent technological advances have decreased its food contamination potential. Industry is now interested in using it for food packaging.

CONSEQUENCES OF PVC USE:

In addition to possible food contamination, **PVC food packaging will at least triple the amount of PVC in your trash within five years.** FDA estimates that it will increase the amount of PVC we use to 600 million pounds per year. PVC is expected to be used for packaging milk, salad dressing, oils, frozen vegetables, cereals and more. Alcoholic beverages will be most heavily affected.

PVC will increase the toxic air emissions from incinerators. When burned, PVC gives off hydrochloric acid gases and some studies implicate the incineration of PVC with the production of dioxins, known to be among the most toxic chemicals. The FDA admits that more scientific data is needed about incineration of PVC. Currently, several states are sponsoring a test in Pittsfield, MA, on the impact of burning PVC. **Yet the FDA is proposing to allow PVC use before the study is concluded and without conducting an EIS.**

PVC is not biodegradable. If landfilled, it will sit for hundreds of years adding to our land disposal crisis. There are cases where vinyl chloride has seeped from landfills and contaminated groundwater.

Using PVC packages will decrease the amount of recycling. Why? PVC is not recyclable from a practical standpoint. It is expected that PVC will be used for beer and soda beverage containers in place of aluminum cans. Of the 65.7 billion aluminum beer and soda cans produced in 1985, nearly 50% were recycled. If millions of PVC containers replace aluminum, it will increase the amount we must landfill or burn. In addition, litter will increase due to a loss of the economic incentives for recycling.

WHAT CAN YOU DO?

WRITE TO FDA AND ASK FOR AN EIS -- RIGHT NOW! There isn't much time. Any day FDA will be deciding whether to waive an EIS and permit PVC food packages before the burn study is completed.

Write to: Frank Young, FDA Commissioner, HF-1 1471, 5600 Fishers Lane, Rockville, Maryland 20857. Docket # 84N-0334.

COALITION FOR RECYCLABLE WASTE

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Dear Friends,

Not too long ago, you helped bring Coca-Cola's test market of the plastic/alumminum can to a halt. Now we need your help again.

The Coalition for Recyclable Waste, spearheaded by the Environmental Task Force (ETF) and the Association of New Jersey Recyclers (ANJR), have identified another bad packaging idea - one that threatens future recycling efforts, our health and the health of the environment. The Food and Drug Administration (FDA) is contemplating a proposed rule tht would permit the use of polyvinyl chloride (PVC) as a food packaging material. If approved, this ruling would greatly increase the amount of pollution created by our trash and cause a potential threat to recycling efforts.

Up until this year, the plastics industry had agreed not to use PVC for food packaging because the material migrated to food and caused contamination. The vinyl chloride monomer in PVC is a known carcinogen to humans. Now they claim that technological advances make it possible to manufacture PVC in a way which will decrease the migration (and contamination) to "acceptable" (or "safe") levels. Based on this, they have asked the FDA to allow PVC food packaging.

The FDA is currently considering waiving the requirement for an Environmental Impact Statement (EIS), a study of the environmental consequences of the PVC decision. They performed an environmental assessment which made a Finding of No Significant Impact. However, there are many aspects of the potential environmental impact which have not been adequately addressed, including the impact on incineration, landfilling and recycling.

We need your immediate help to put pressure on FDA. As a first step, we want FDA to perform a study of the potential adverse environmental impacts that increased PVC usage will have on our waste stream. Through your efforts, we were able to convince Coca-Cola to withdraw its plastic/aluminum can. Yet we are now faced with a more serious threat from PVC's. When burned, the chlorine in PVC combines with water vapor to form HCl - Hydrochloric acid - gases. With more communities turning to incineration as a solid waste disposal option, this decision could cause significant environmental damage.

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The incineration of PVC's has been implicated in the production of dioxins and furans. Right now a study is being conducted in Pittsfield, Mass. to assess the potential contribution PVC from the waste stream has on the formation of dioxins and furans. Results are expected by February. Yet FDA may not wait for these results before making a determination.

Chlorine is part of the primary mechanism involved in destroying the ozone layer in the stratosphere. The destruction of the ozone layer is causing an increase in skin cancer. The possible contribution this action could make should be seriously examined.

Communities are spending millions of dollars on incineration technology. Yet, studies have shown that increased levels of HCl produced by PVC increases the rate of corrosion in an incinerator. After all, would you put hydrochloric acid in your car? This action would possibly have us adding it to our machinery and our air.

In addition, PVC is non-biodegradable. There are some cases where vinyl chloride leaching from landfills has contaminated groundwater. If approved, this material (PVC) would displace recyclable materials in the waste stream such as glass and metals, especially in the area of food and beverage containers. The FDA estimates that the amount of PVC will almost triple to 600 million pounds per year in five years. We feel this estimate is low. This material change could have significant economic impacts, increase the amount of waste which communities must dispose, and potentially increase energy demands. Furthermore, fledgling plastic (PET) recycling efforts would be faced with a material (PVC) which is virtually indistinguishable from PET but which, if mixed, acts as a contaminant and prevents recyclability.

Once again your involvement is critically needed. The informed comments of many concerned citizens and members of the Coalition for Recyclable Waste may cause FDA to reevaluate PVC. The Coalition is asking the FDA to perform an EIS on the many potential secondary hazards associated with using PVC's as a food packaging material, and to incorporate public comments on the impacts of using PVC's in their final decision. It is likely this will lead to a long battle. But with your help, we're confident we can prevent the use of PVC's in food packaging.

Sincerely,



Ruth V. Lampi

National Outreach Coordinator

PS. Please send us copies of any letter you send, newspaper or newsletter articles, and descriptions of campaign activities you may generate in your community. We want to keep track of how many people are responding so that we can inform the media about the grassroots reaction to the FDA's proposal. So far, only 25 comments have been received by FDA on this issue. With your help, we can get attention focused on this issue and force them to consider the environmental impacts.

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WHAT YOU CAN DO

ACTIONS NOW!

Although the FDA could issue a decision at any time, they have indicated to us that they might delay publication until January, if they begin to receive a significant level of informed comments from us. Because you helped us to win the Coke campaign, we hope you will also help us now, in the critical stages of laying the groundwork for this campaign. Here's the kind of help that we need immediately from you and other key Coalition members around the country:

- **Most importantly: Write FDA** and express your concerns about polyvinyl chloride, and the problems you feel should be addressed. Explain why health and environmental impact studies are needed. **Circulate your letters** for review and comment, and possible joint signatures. Be sure that others write letters too. Send copies to CRW, your local elected officials, and solid waste planners.
- **Put the Coalition's PVC Campaign on the agenda of every conference** that addresses recycling, solid waste, health, nutrition, consumer awareness and environmental issues. Ask conference organizers and expert speakers to distribute materials and offer presentations on the campaign.
- **Provide reporters with background information**, help them build their files, and suggest sources for them to pursue. Learn about submission deadlines, and reserve space in local newsletters and periodicals, to provide them with your own announcements and articles for publication.
- **Build the Coalition** by informing other local, state and national organizations. Alert them and prepare them so that they are poised for quick response. The Coalition will be even stronger this time because we are uniting people concerned about healthy food with those those working for a healthy environment. And anti-incineration groups are joined by pro-incinerator interests that don't want the pollution control problems created by dioxin and hydrochloric acid gas emissions.

FUTURE ACTIONS

As soon as we know the guidelines are released, we will be sending you a brief press advisory. When We suspect that the FDA will still favor an increase in PVC packaging. If so, we then will want to mobilize a massive network and seek the broadest possible public response. This will be the time when numbers will really count, and we will need to generate the greatest volume of public comment, and work for high visibility in the media. Here are our suggestions for your actions then:

- **Issue your own press release** to local media, providing background information on the FDA PVC issue, and the position of your organization. Hold a **press conference or rally** in your community, or arrange a panel of experts and community leaders to speak on a local **radio show**. Invite celebrities, local politicians, solid waste management planners, citizen advisory groups, environmentalists, doctors, health and nutrition experts, garden clubs, and youth groups, to participate in these events.
- **Expand the letter writing campaign** to include individuals in all these groups.
- **Fight implementation directly** by persuading food and beverage producers, distributors, and retailers, to refuse to market products in PVC, and to reassure the public that they will continue to offer products in recyclable glass and metal.
- **Ask your organization to pass a resolution** in support of the purposes and goals of the Coalition, and explain why they believe that FDA must conduct a comprehensive environmental impact statement.
- **Gather signatures on a petition**. Set up tables in front of supermarkets, or libraries, or canvass door to door.

THE COALITION FOR RECYCLABLE WASTE

THE PURPOSE of the Coalition for Recyclable Waste is to mobilize a network of individuals and groups into an effective force that will:

Educate consumers about the connections between what they buy and problems created for solid waste management.

Encourage consumer purchase of products and packaging which are durable, reusable or recyclable.

Expose false advertising regarding recyclability of specific products.

Motivate the packaging and manufacturing industries to incorporate environmental and solid waste management considerations into product and packaging design.

THE COALITION PLEDGE

☐ Yes I want to register my support for the Coalition for Recyclable Waste.

☐ I have written a letter to FDA, a copy is enclosed.

☐ Other actions I intend to take are:

☐ Send me more information, and samples of letters written by other Coalition members.

☐ Enclosed is a check payable to The Coalition for Recyclable Waste, for \$_____ to support the efforts of the Coalition, and to help cover printing and mailing expenses.

Send check to: **CRWS National Outreach, c/o Environmental Task Force,
1012 14th St., NW Fifth Floor, Washington, D.C. 20036.**

Name _____

Title/Affiliation _____

Address _____

City _____ State _____ Zip _____ Telephone _____

JOIN THE NATIONAL ROSTER! Please tell us about any other actions you undertake so that everyone will know that you are a part of the Coalition for Recyclable Waste.

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