## FLEXIBLE VINYL MATTERS

HOLIDAY EDITION 2019



The Flexible Vinyl Alliance (FVA) is a coalition of over 90 companies representing the full value chain of the flexible vinyl industry from resin supply to compounding, manufacturing and retail. The FVA is further affiliated with 900 additional businesses through its allied trade relationships.

# FVA Engaging in California DTSC Process on Food Packaging

The state of California, through the Safer Consumer Products Branch (SCPB) of its Department of Toxic Substances Control (DTSC) is now scrutinizing orthophthalates in food packaging as a potential focus of a full-blown Alternatives Assessment, tied to certain products. This is a regulatory process which will take months to unfold. Food packaging is one of the product categories identified in DTSC's 2018-2020 DTSC Priority Product Work Plan, which can be seen here.

The Flexible Vinyl Alliance fielded a witness to the first DTSC Workshop on this issue on November 19 in Sacramento.

For those that want a copy of the slides, or a link to the proceedings record,

please contact Kevin Ott at kott@flexinylalliance.com.

The FVA is preparing additional comments to DTSC, for submission on December 19. These comments dovetail with the messaging presented in the November testimony. Much of the content of the FVA comments references the two-plus years of work that we have invested in the FDA Petition process, still pending. (See related article page 2.) The DTSC process is one that the FVA will give high priority to in 2020.

This matter could implact the flexible vinyl value chain nationwide, in terms of plasticizers uses and alternatives, which are also on the DTSC scrutiny list. Please check our website for updates, and/or our LinkedIn page.



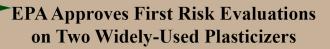
### Vinyl Yoga Mats: Santa's Choice

Recently, there has been ill-informed criticism around the "sustainability" of PVC yoga mats, and whether or not "natural" materials are better, safer or environmentally "friendlier" than vinyl products for yoga practicioners.

However, PVC remains the material of choice for Mr. & Mrs. Claus' yoga mats. Why? PVC yoga mats are durable, safe, sanitary, easy to clean, affordable and recyclable.

It's no wonder PVC yoga mats are widely considered to be one of the most resilient and innovative options available on the market today, making them the perfect gift (with a ribbon attached, of course) under your vinyl Holiday tree. Namaste....Happy Holidays!





On December 1, EPA ( US Environmental Protection Agency) granted the first two manufacturer requests for risk evaluations for DIDP and DINP, two predominant plasticizers used in the flexible vinyl product markets. EPA received the two manufacturer requests to conduct risk evaluations of diisodecyl phthalate (DIDP) and diisononyl phthalate (DINP) from the American Chemistry Council's High Phthalates Panel in May 2019. Both DIDP and DINP belong to a family of chemicals called phthalates and are commonly used as plasticizers in the production of plastic and plastic coating to increase flexibility. Manufacturer-requested risk evaluations are conducted in the same manner as other risk evaluations conducted under section 6(b)(4)(A) of the Toxic Substances Control Act (TSCA). For information about the ongoing TSCA process, please contact Kevin Ott or see the EPA site here.

### FDA Process Pending on Food Contact and Ortho-Phthalates

The FVA continues to engage with the US Food & Drug Administration (FDA) on a Petition filed in July 2018 to continue FDA authorization of four ortho-phthalates in food contact, and a proposed abandonment of twenty six phthalates no longer used in such applications. FVA undertook an extensive and thorough survey process to document that the 26 are no longer used in most commerce, especially in food contact. At the end of 2018—through FOIA request—FVA successfully defended the food master file, and has responded to several clarification requests from FDA since mid-2018.

FVA expects a resolution of this matter within the coming weeks with a notice of decision in the Federal Register. Interested parties are encouraged to join and contribute to the Ortho-Phthalates Coalition, the entity established to fund legal work and to continue the focus on this important matter. Contact Kevin Ott for information on the costs and requirements of Coalition participation.

### Vinyl Verified: Correcting the Record Around PVC

The Vinyl Institute, in partnership with several trade groups, continues to support an activity that has industry-wide benefits -- those being the efforts behind Vinyl Verified <a href="https://www.vinylverified.com">www.vinylverified.com</a>.

Whether engaging with inaccurate stories appearing on the Dr. Oz Show (PVC pool toys), National Geographic (PVC in healthcare), inaccurate stories on PVC safety (Consumer Reports) or any basic mischaracterizations of PVC, rigid or flexible, or pushing back on junk science, Vinyl Verified is on the case.

Related to this, FVA was asked to write a Fact Sheet around PVC and plasticizers, which can be viewed on the FVA website or Vinyl Verified site. Compliments to the team at Vinyl Verified. Please visit their site, an excellent resource for the industry!



### Flexible Vinyl Alliance in 2020

FVA thanks all of you for your continued support. FVA marked its 10th Anniversary in October of 2019. Based on adequate funding, we anticipate continuing our role in 2020 in representing the \$20B flexible vinyl value chain, and the critical importance our products represent in medical, therapeutics, building, roofing, flooring, wire and cable, automotive, wallcovering, film, fabric, packaging and recreation industries. Visit us at <a href="https://www.flexvinylalliance.com">www.flexvinylalliance.com</a>, Or, on our LinkedIn page. Happy New Year to all...

### Flexible Vinyl Alliance (FVA)

The Flexible Vinyl Alliance (FVA) was launched in the fall of 2009 as an independent, dedicated, proactive, integrated and informal advocacy network to rapidly respond at the federal, state and local levels to de-selection threats that affect the continued business interests of the flexible vinyl industry. The FVA, through its broad base of participants, provides information, messaging and guidance for its members to assist them in effectively advocating for the proven safety, economy and utility of flexible vinyl products, which are widely used in consumer products, military settings, automobiles, buildings, hospitals and life-saving medical applications, among others. FVA consists of a core group of trade associations and interested industry concerns, to include raw materials suppliers, compounders, manufacturers, processors, converters, manufacturers of finished products and other constituencies. The FVA is led by its own autonomous Steering Committee, reflecting the complete flexible vinyl value chain.

FVA is managed by Ott Consulting Group, Kevin Ott, Executive Director | Phone: (571) 348-5104 | Email: <a href="mailto:kott@flexinylalliance.com">kott@flexinylalliance.com</a>. For more information, please visit <a href="https://www.flexvinylalliance.com">www.flexvinylalliance.com</a>.