

PVC STEWARDSHIP PROGRAM

2024 ANNUAL PROGRESS REPORT

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Vinyl Council of Australia's Product Stewardship program (PSP) is a voluntary initiative that began in 2002, aiming to address environmental and health considerations throughout the life cycle of PVC products.

Celebrating its 23rd year in 2024, the PSP has evolved to remain at the forefront of product stewardship, continuously adapting to meet stakeholder expectations and emerging sustainability challenges. Now with 21 commitments taking on a holistic approach, the program ensures that Signatories are actively working towards meaningful action aligned with current environmental priorities, including:

- Best Practice Manufacturing implementing environmental systems to minimise impact during production.
- Safe and Sustainable Use of Additives phasing out hazardous substances like cadmium and lead stabilisers and promoting the use of safer alternatives.
- Energy and Greenhouse Gas Management enhancing energy efficiency and reducing greenhouse gas emissions across operations.
- Resource Efficiency encouraging recycling initiatives and efficient use of materials to minimise waste.
- **Transparency and engagement** committing to public reporting and stakeholder engagement to maintain accountability.



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The 45 Signatories reporting in 2024 represent the full spectrum of the vinyl value chain in Australia - from resin and additive producers to manufacturers and importers of finished PVC goods. This broad representation reinforces the PSP's commitment to whole-of-life sustainability and ensures that its actions reflect the collective effort of the entire industry. *Figure 1* illustrates the distribution of Signatories across each stage of the vinyl value chain.

The steady growth of the PSP's reach and influence is reflected in the number of reporting Signatories over time. *Figure 2* highlights this progression since 2005, showcasing the increasing industry engagement with the program and its core sustainability goals.

The impact of this holistic approach is demonstrated through industry best practice, innovation and proactive initiatives undertaken by Signatories. Across the Australian vinyl chain, Signatories are adopting environmentally responsible and circular economy practices. These include the successful implementation of small-scale solar systems, water efficiency measures, Power Purchasing Agreements, and innovative process improvements, alongside programs designed to further encourage the use of recyclate.

Vinyl Council of Australia and PSP Signatories recognise the essential role that vinyl products play in advancing a more sustainable future. With their durability, versatility, and resource efficiency, PVC materials support vital sectors including healthcare, construction, and infrastructure. As Australia accelerates its shift toward a circular economy, the PSP positions its Signatories within the Australian PVC industry, to lead – championing material efficiency, sustainable product design, and durability in applications that deliver high societal value.

Figure 1: 2024 Signatories by Type







SUMMARY OF COMMITMENTS

Commitments	Benchmarks				
BEST PRACTICE MANUFACTURING					
Quality Management Systems	Signatories commit to having a documented quality management system, which follows the principles of ISO 9001:2015.				
Environmental Management Systems	Signatories commit to having an Environmental Management System that meets or exceeds the Australian PVC industry's Minimum Acceptable Standard.				
Mercury Avoidance	Verify that the PVC resin contained in PVC product sold in Australia is sourced from mercury-free processes.				
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.				
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.				
Residual VCM	Verify that residual VCM in supplied resin is not greater than 1ppm in 99% batches tested.				
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				
Stabilisers and Pigments	Avoid use/supply of lead, cadmium, and hexavalent chromium additives. Any use of these additives shall be reported annually.				
Recycling PVC Containing Legacy Additives	Responsibly recycle end-of-life PVC products that contain legacy additives.				
Plasticisers	Comply with regulatory requirements on the use of plasticisers in flexible PVC products and agree to voluntary phase-out of LMW phthalates.				
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.				

Commitments	Benchmarks				
ENERGY AND GREENHOUS	ENERGY AND GREENHOUSE GAS MANAGEMENT				
Energy and Greenhouse Gas Emissions	Demonstrate a commitment to improving the energy and greenhouse gas emission profile of PVC products.				
RESOURCE EFFICIENCY					
Post-Industrial PVC Waste	Reduce post-industrial PVC waste sent to landfill to <2% of the total production of saleable PVC product.				
Recycled PVC	Use recycled PVC in PVC products supplied to the Australian market (unless product standards and codes restrict the use of recycled materials.)				
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.				
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.				
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 ENG	AGEMENT				
Acknowledgement of PSP	Demonstrate the business acknowledges to staff and its market, its commitment and obligations to the PVC Stewardship Program.				
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.				
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.				
Modern Slavery	Signatories voluntarily commit to taking reasonable efforts to investigate that there is no modern slavery in their supply chains.				

MESSAGE FROM THE CHAIRMAN

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In 2024, the Vinyl Council of Australia, our members, and the PVC Stewardship Program (PSP) made meaningful progress in advancing sustainability and continuous improvement across our sector.

Our shared commitment to a whole-of-life approach to PVC stewardship program including responsible manufacturing and innovation remains strong, as evidenced by the continued dedication of our Signatories to the programs 21 commitments – each aligned with key environmental goals.

The alignment of the PSP with Best Environmental Practise PVC 2.0 has helped to further elevate sustainability benchmarks across the industry. This synergy ensures that signatories who meet the programs expectations are recognised within the Australian building sector for their leadership. Notably, enhanced standards across several commitments have been met with strong compliance – highlighting an industry wide drive towards sustainable and ethical practices and responsible sourcing, to end-of-life management.

Throughout the year, many of our members implemented practical initiatives aimed at increasing efficiency and reducing environmental impact. From circularity and waste reduction to energy efficiency and renewable integration are proving that environmental progress can go hand in hand with economic value.

Recycling continues to be a core focus of the PSP, with collaborative initiatives such as ResiLoop, PVC Recycling in Hospitals, the PIPA Recycling Program, and window profile takeback schemes all playing a vital role. These programs are examples of the PSP's whole-of-life approach, ensuring that PVC materials are responsibly managed from production through to recovery and reuse. As we look ahead to 2025 and beyond, we're excited by the momentum we have built. Our priorities remain clear: improve compliance, encourage recycling systems, reduce emissions, and advancing responsible sourcing. To support these goals, we're pleased to introduce two Signatory supported subcommittees—one focused on energy & greenhouse gas emissions and, the other on circularity—to help shape the next phase of the PVC industry's sustainability journey in Australia.

The PVC Stewardship Program remains a vital platform for delivering progress, ensuring that environmental responsibility is embedded at every stage of the PVC lifecycle. I encourage all members of our industry to remain actively engaged with the program and help shape the future of our industry.

Finally, I want to extend my sincere thanks to the Technical Steering Group and every PSP Signatory for your continued commitment and collaboration. Your efforts are not only transforming our industry today—they are helping to build a more sustainable, innovative, and responsible future for PVC in Australia.

Peter Byron

Peter Byron Technical Steering Group Chair PVC Stewardship Program

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48 Signatories at Year End

- Signatories Reporting
 - New Signatories Reporting
- Non Reporting Signatories

STATUS:

- Signatories Achieving Excellence
 - PROGRAM MILESTONES:
- Percent above 80% Compliance (80% target)
- Percent at or above 50% Compliance (100% target)
 - Independent Verifications of Signatories

B9 Percent Average Compliance (+3%)

In 2024, the PSP saw strong engagement from its 48 Signatories, with 45 companies completing annual reporting requirements, two of them reporting for the first time. Of these, 19 Signatories (42%) achieved Excellence in Stewardship, nearly doubling the previous year's result of 10. This improvement was largely driven by a 23% increase in compliance with commitment 5.4 Modern Slavery, and a revision to commitment 3.1 Energy & Greenhouse Gas Emissions, which no longer requires compliance with commitment 4.2 Recycled PVC. This change enabled several Signatories who narrowly missed out in 2023 to achieve Excellence it in 2024.



PSP Signatory representatives proudly display their Excellence Awards at PVC AUS 2024, recognising outstanding commitment to sustainability and innovation across the vinyl industry.

An additional 21 Signatories (47%) achieved *Silver* status, while 5 (11%) reached *Bronze.* In total, 19 Signatories improved their benchmark status. All reporting Signatories achieved at least 50% compliance, and 89% reached or exceeded the 80% compliance mark, surpassing the program's target of 80%. The average compliance rate rose to 89%, up from 86% in 2023 and returning to 2022 level despite tightened evidence requirements across several commitments. These results reflect continued progress and growing alignment with PSP sustainability goals. To support transparency and accountability, 10 Signatories underwent independent verification by the PSP's audit partner, Foresight.

Recyclate use remains a key focus of the program. Although overall volume declined in 2024, domestic consumption remained strong at 2,091 tonnes, down 7% from 2023. A further 371 tonnes of compound were supplied to the market, and 1,418 tonnes were used in imported goods, bringing the total to just under 3,880 tonnes – a 9.35% decrease, *Figure 3* shows the distribution of

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2024 recyclate and *Figure* 4 shows domestic recyclate consumption since 2016 when VCA began recording data¹. These shifts highlight ongoing challenges in the Australian recycling sector, but many Signatories continue to support circular economy practices, with several Signatories maintaining high levels of recyclate use in their operations.

¹ These figures may not fully account for recycled PVC used by non-signatories.

Figure 3: 2024 Domestic Recyclate Consumption

Local Consumption by Signatories

Imported Consumption by Signatories



Compound Supplied by Signatories to Non-Signatories

The continued whole-of-life alignment between the PSP and BEP PVC 2.0 ensures that Signatories remain leaders in responsible manufacturing, product stewardship, and sustainable supply chain practices. As the industry evolves, the PSP's focus on evidence-based reporting and continuous improvement will further strengthen its position as a leading sustainability initiative for PVC in Australia.

Figure 4: Domestic Consumption of PVC Recyclate since 2016 (KGs)



Local Consumption by Signatories
 Compound Supplied by Signatories to Non-Signatories
 Imported Consumption by Signatories

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Progress on New Commitments in 2024

Following the introduction of four new commitments in 2023, 2024 marked a significant milestone as the first full year of reporting and scoring for three commitment areas

- 1.1 Quality Management Systems,
- 1.6 Wastes & Effluent,
- 5.2 Supply Chain Mapping.

This marked a shift from initial familiarisation to structured reporting. Signatories' results reflect strong engagement and ongoing commitment to the PSP.

Encouragingly, 100% of Signatories met the requirements for Commitment 1.1 QMS, indicating sector wide adoption of formal quality management systems. Commitment 1.6 Wastes & Effluent achieved a compliance rate of 93%, while commitment 5.2 Supply Chain Mapping achieved 89% compliance. These outcomes reflect the ongoing focus by Signatories on improving environmental performance and operational accountability.

Commitment 5.3 Responsible Sourcing Policy, introduced in 2023, remains in its two-year grace period, with full scoring to commence in 2025. Nonetheless, 80% of Signatories have already submitted drafts or preliminary policies, demonstrating proactive engagement. As this commitment requires careful planning and a deeper examination of supply chains, VCA has prepared guidance material available via the members portal to support Signatories in developing robust policies ahead of full implementation.

Mandatory Carbon Reporting Webinars

To support Signatories in preparing for upcoming carbon accounting and disclosure requirements, VCA partnered with thinkstep-anz to deliver a four-part webinar series in 2024. Designed to build capability ahead of the introduction of mandatory climate related reporting, the sessions aimed to provide VCA members with knowledge and practical tools to help members with carbon measurement and reporting efforts.

The series covered the fundamentals of greenhouse gas emissions—what they are, how they're measured, and the difference between corporate and product carbon footprints. Members learned how to identify emissions 'hot spots', gather relevant data, and make initial estimations. The webinars also emphasised the potential competitive advantage of strong carbon reporting, in addition to regulatory compliance.

Decarbonisation strategies were another key component, with insights on improving energy efficiency, optimising material use, and making sustainable design and supply chain decisions. Life cycle thinking was introduced as a valuable approach for assessing a product's full carbon impact.

The later sessions examined the evolving regulatory landscape, including the Australian Sustainability Reporting Standards and upcoming climate-related disclosure requirements. Members were guided through implementation timelines, reporting expectations, and how to prepare governance processes, risk assessments, and emissions targets—drawing on lessons from New Zealand's early experience.

Whether new to carbon reporting or building on existing systems, the series gave members a clear and accessible starting point. Webinar recordings and resources are now available via the VCA Members Portal.

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Government Accreditation

In 2024, Vinyl Council of Australia continued to pursue formal recognition of the PVC Stewardship Program through an application for Australian Government accreditation. VCA sees strong alignment between the PSP and the Federal Government's Product Stewardship Accreditation program objectives through emphasis on whole-of-life product responsibility, resource efficiency, and improved environmental outcomes.

Accreditation would represent a significant milestone further validating the PSP as a credible, industry led initiative that delivers measurable progress against circular economy and environmental targets.

Despite this, VCA has temporarily paused the application process pending an upcoming of the review of the Recycling and Waste Reduction Act (RaWR), scheduled for 2025. The review is expected to clarify the Governments future approach to product stewardship and accreditation pathways. VCA intends to resume its application following the review, with a view to ensuring alignment with any updated accreditation requirements or policy frameworks.

In the interim, the VCA remains committed to strengthening the PSP's impact and transparency. While continuing to engage with government stakeholders to ensure the Program remains a leading example of voluntary, whole of industry stewardship.

PSP Subcommittees

As part of the VCA's commitment to continuous improvement, two new subcommittees have been prioritised in response to with recommendations from the 2022 Five-Year Review.

The Energy and Greenhouse Gas Emissions Subcommittee has now been formally established and is scheduled to commence meetings in 2025. This group will support the ongoing evolution of the PSP, focusing on the pillar of Energy & Greenhouse Gas Management & Commitment 3.1. The Subcommittee seeks to enable members by encouraging improved emissions monitoring, energy efficiency and climate literacy among Signatories. While any recommendations – such as emission reduction frameworks or voluntary targets - will remain non-prescriptive, the subcommittee's aim is to build capability and offer practical guidance to assist Signatories in strengthening their own sustainability targets and strategies in alignment with National Emissions Reductions targets.

The Circularity Subcommittee is also marked for activation in 2025. Its purpose will be to explore opportunities for increasing circular outcomes across the PVC value chain from both design and production through to end-of-life recovery. This includes investigating best practice, market barriers, and pathways to improve recyclability, reusability and material optimisation within the sector.

Together, these subcommittees represent a proactive step towards embedding deeper subject matter expertise within the PSP's, enabling a more collaborative and informed approach to whole-of-life sustainability outcomes.

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PVC Recycling in the Healthcare Sector

IN HOSPITALS

The PVC Recycling in Hospitals Program, supported by Baxter Healthcare continued to expand in 2024, achieving a new milestone in medical plastic recovery. In 2024, the program collected 133 tonnes of medical PVC waste, marking a 10% increase from 2023's 120 tonnes. This sustained growth highlights the commitment of hospitals and healthcare facilities across Australia to diverting PVC from landfill and supporting a circular economy.

Looking ahead, Baxter Healthcare is actively seeking new partnerships to further expand the 300+ participating collection sites and grow the program, both in existing hospitals and new locations. By enhancing collection networks and engaging more healthcare facilities, the initiative aims to recover even greater volumes of PVC, reinforcing its role as a global leader in sustainable medical waste management.

Figure 5: Domestic Consumption of PVC Recyclate



PHARMACYCLE

Pharmacycle, Australia's first and only end to end recycling program for household and commercial medicinal blister pack waste, continued to grow in 2024, with over 64 million blister packs recycled since its launch in 2022 an impressive milestone for an initiative tackling hard-to-recycle, composite healthcare waste. In December alone, the program processed 3.4 million blister packs, highlighting its rapid growth and increasing public engagement with pharmaceutical waste recycling².

The recovered PVC from blister packs is transformed into long-life products, such as decking and fencing, through collaborations with PSP Signatory, Thinkfencing, which incorporates the recyclate into products like ONEDECK. This real-world reuse of recovered material showcases how high-quality PVC recyclate can be diverted from landfill and returned to the economy in meaningful ways.

Pharmacycle's mission aligns closely with the PSP's whole-of-life approach, emphasising the importance of responsible product design, end-of-life recovery, and the development of local circular systems. Vinyl Council of Australia commends Pharmacycle's leadership and commitment to improving recovery pathways for PVC and recognises its contribution to building stronger infrastructure and public awareness around PVC recycling in Australia.

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Circular economy outlooks in Australia

In 2024, the Australian Government reinforced its commitment to circularity with a target to double circular outcomes by 2035. The National Circular Economy Framework now emphasises a whole-of-life approach, focusing on product design, reuse, and material efficiency—areas where the PSP is already well aligned due to its holistic approach and focus on efficient reprocessing and recyclability built into products.

Reform of the plastics and packaging product stewardship scheme is underway, with mandatory models being considered for different sectors. This would introduce clearer targets for reuse and recycling, stronger compliance, and improved traceability—directly impacting how PVC is managed after use.

Sustainable procurement policies are also expanding, presenting additional opportunities for recycled PVC products—particularly if standards are updated to support their use in infrastructure projects. Efforts to harmonise waste classifications, content standards, and recycling regulations are expected to reduce complexity for businesses working with PVC. Currently, the classification of some PVC waste as hazardous presents a barrier to efficient circularity and reuse within the PVC industry. Broader regulatory changes—such as improved material tracking, clearer labelling schemes, and greater support for regional recycling infrastructure—could play a key role in enabling more effective recovery and reuse of PVC, particularly in the construction sector.

Case Study: Formosa: Enhancing Energy Efficiency in PVC Production

PSP Signatory Formosa's Lin Plastic Plant has implemented an innovative crossplant energy recovery system to improve energy efficiency and sustainability in PVC production while also reducing operating costs. Traditionally, the PVC manufacturing process relies on significant amounts of steam, generated externally, to maintain production temperatures. However, a key opportunity was identified to capture and repurpose waste heat from the VCM plant's quenching tower, reducing the need for additional steam generation. Previously, excess heat from the Ethylene Dichloride cracking process required large volumes of cooling water to dissipate it. Now, the system redirects this otherwise wasted heat into a hot water recovery system, which supplies multiple production stages, including polymerization, and purification.

To make this system possible, Formosa PC installed a heat exchanger and a large-capacity hot water tank, increasing water temperatures and recovering substantial amounts of energy that would have otherwise been lost. This improvement significantly reduces fuel consumption while maintaining consistent water temperatures, which enhances process stability and product quality. Additionally, the project improves energy efficiency through efficient heat recovery, conserving tonnes of steam per hour that would otherwise be used to enable industrial processes. By lowering energy demand and optimizing resource use, the initiative contributes to reduced carbon emissions and a more environmentally responsible production process.

This pioneering energy recovery project is a strong example of how smart resource management can improve both operational efficiency and environmental sustainability. By repurposing waste heat, the company has lowered energy consumption, reduced water usage, and improved the overall efficiency of PVC production. This project not only demonstrates a commitment to sustainable manufacturing but also sets a benchmark for the broader industry, highlighting the importance of innovation in resource efficiency. As the PVC industry continues to evolve, this project serves as an inspiration for other organisations to explore new ways to maximize efficiency, reduce emissions, and contribute to a more sustainable future.

INDUSTRY BENCHMARKS

Figure 6: **Outcomes by Commitment Graph** 04 INTRODUCTION Quality Management System (QMS) Environmental Management System (EMS) 06 SUMMARY OF COMMITMENTS Mercury Avoidance MESSAGE FROM THE CHAIRMAN S-PVC Emissions E-PVC Emissions 08 PROGRAM OUTCOMES Residual VCM PROGRAM UPDATES 10 Wastes and Effluent Stabilisers & Pigments* MOVING FORWARD 11 Recycling PVC Containing Legacy Additives 12 INDUSTRY DEVELOPMENTS Plasticisers Open Disclosure INDUSTRY BENCHMARKS Energy Efficiency & Greenhouse Gas Management VERIFICATION AUDIT STATEMENT Post-industrial PVC Product Waste 20 GLOSSARY Recycled PVC Encouraging Consumer Responsible Care Packaging Waste Life Cycle Thinking Acknowledgement of the PSP Supply Chain Mapping Responsible Sourcing Policy Modern Slavery 0% 10% 20% 30% 40% 50% 60% 70% 80% 90% 100%

full compliance

PSP ACHIEVEMENTS

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Note: Depending on a Signatory's supply chain position and product/component type, not all commitments will be relevant to each Signatory. For example, commitments regarding the PVC resin are not relevant to additive manufacturers and suppliers.

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Outcomes by Commitment

Of the twenty-one program commitments, six commitments maintained full compliance in 2024 – an encouraging indicator of long-term consistency across these critical areas. These include:

- 1.1 Quality Management System,
- 1.3 Mercury Avoidance,
- 1.4.1 VCM Emissions (S-PVC),
- 1.4.2 VCM Emissions (E-PVC),
- 1.5 Residual VCM,
- 2.1 Stabilisers & Pigments.

Strong year on year improvements were recorded in several key commitments, reinforcing the programs focus on environmental responsibility and continuous improvement:

- 1.2 Environmental Management Systems rose 7% to 96%,
- 2.4 Open Disclosure increased by 3% to 94%,
- 4.1 Post-Industrial PVC Waste saw a notable 17% increase reaching 90%, indicating steady progress in environmental responsibility and internal production efficiency.

These gains highlight growing maturity in operational systems and a stronger willingness to disclose environmental information, especially in relation to waste management and efficiency.

Compliance with Commitment 3.1 Energy & Greenhouse Gas Emissions increased to 82% (up 7%), reflecting VCA's forecast from 2023. This upward trend suggests that Signatories are beginning to embed carbon monitoring and reduction strategies in anticipation of growing climate reporting requirements in Australia.

Notably, declines were observed in commitments relating to recycling:

- 2.2 Recycling PVC with Legacy Additives (down 11% to 47%)
- 4.2 Recycled PVC (down 10% to 50%).

These reductions are largely due to more rigorous scoring introduced last year, with most Signatories reported as non-compliant not using any recycled PVC which prior to 2023 would result in a score of N/A. As PSP Signatories continue to pursue circularity within the PVC industry, persistent barriers and challenges remain, such as limited local recycling and sorting infrastructure, low volumes of end-of-life material due to the long lifespan of durable PVC products, and a high proportion of imported finished goods that are not designed for recyclability.

To address these gaps, Signatories and the broader industry are actively working to improve recycling outcomes. Initiatives such as the PVC Recycling in Hospitals program and the Pharmacycle scheme are helping to increase recovery of clean, separated PVC from healthcare settings. While ResiLoop is establishing new collection infrastructure to support source separation of PVC waste and improve recycling rates at scale. These programs represent critical steps toward closing the loop and addressing structural limitations in Australia's recycling system. With continued investment and collaboration, the industry is well-positioned to turn the tide on recyclate availability and support a more circular future for PVC.

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Figure 7: Commitment compliance comparison between 2023 and 2024

Compliance with commitment 2.3 Plasticisers decreased slightly to 96% from 100% compliance, alongside an 8% increase in DEHP/DOP usage. This highlights the importance of these chemicals for certain applications and a need for continued research into safe, viable alternatives. 44 of the 45 reporting Signatories confirmed compliance with PSP guidance around restricted applications, ensuring safe and responsible use.

Commitment 5.4 Modern Slavery Statement saw a strong uplift improving from 58% in 2023 to 82% in 2024. This 23% increase demonstrates strong response from Signatories to sustainably manage their supply chains as these statements are rolled out.

Overall, The average compliance across all commitments in 2024 rose to 89%, up from 86% in 2023 – a clear sign that Signatories are continuing to deepen their engagement and improve performance across a broad range of environmental, social and operational areas.

Scoring Breakdown

Signatories are scored for each commitment out of the following:

FULL COMPLIANCE (2)	PARTIAL COMPLIANCE (1)	NON-COMPLIANCE (0)
Full Compliance is	Partial Compliance may be	Non-Compliance shall
awarded when the	applicable in some cases if the	be allocated if the
Signatory meets all	Signatory meets some, but not all,	Signatory fails to meet
necessary requirements	of a commitment's requirements.	the requirements of the
of the commitment.	Not all commitments may have an	commitment.
	eligible partial compliance pathway.	



Signatory Scoring Graph with Milestones

Milestone 1 ·····





Figure 8: Individual Signatory Compliance

Figure 8 shows the spread of scores across all 45 reporting Signatories relative to PSP's two program milestones. For the 2024 reporting period, 100% of Signatories received at least 50% compliance, impressively the second milestone

to have 80% of Signatories achieve 80% compliance or higher was exceeded in 2024 with 89% of Signatories achieving this. The final average compliance of all Signatories was 89%.

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Benchmarks

Excellence

Akdeniz Chemson Additives Pacific Australian Plastic Profiles Australian Vinyls Corporation Baerlocher (M) Sdn Bhd Formosa Plastics Corporation, Taiwan Iplex Pipelines Australia IXOM Operations Pipemakers Australia Plustec Primaplas PT Asahimas Chemical Sekisui Rib Loc Specialty Polymers & Chemicals Stormtech Sun Ace Australia Tarkett Australia TechPlas Extrusions Think Fencing Vinidex

Silver

AFS Systems Altro APAC Armstrong Flooring Bambach Wires and Cables Baxter Healthcare Breathe Fresh (Australia) CMS Electracom Dincel Construction Systems Dunlop Flooring FireSense Forbo Floorcoverings Gerflor Australasia Integrated Packaging Karndean International Kenbrock Flooring Plastic Bend Fabrications Plastral **RBM Plastic Extrusions** Serge Ferrari The Andrews Group Welvic Australia

Bronze

Deceuninck Australia Normet Plascorp Profine International Profile Group Veka Plastics

Withdrawn from PSP

Polymer Direct

Award Overview

Excellence in Stewardship (Gold) – Signatories achieving full compliance with all relevant commitments (100%).

Silver – Signatories achieving a compliance score between 80–99%.

Bronze – Signatories achieving a compliance score between 50-79%.

Non-Compliant - Signatories failing to achieve at least 50% compliance.

Failed to Report – Signatories that failed to submit a survey response as part of the annual reporting period.

VERIFICATION AUDIT STATEMENT



- **19** VERIFICATION AUDIT STATEMENT



Foresight Consulting Group Level 12, 321 Exhibition Street Melhourne VIC 3000 Australia

validation procedures

Independent Limited Assurance Statement to the Management and Directors of the Vinyl Council

Our conclusion

Foresight Consulting Group (FCG, twe) was engaged by the Vinyl Council of Australia (*VCA*) to undertake fimited assurance as defined by Australian Auditing Standards, over the transcription of 58 statements (the "Selected Performance Statements") within the 2024 PVC Stewardship Program Progress Report ("PSP Report") for the year ended 31 December 2024 (the "Subject Matter"). Based on our limited assurance engagement, nothing has come to our attention that causes us to believe that the transcription of the Selected Performance Statements has not been prepared and presented fairly, in all material respects, in accordance with the criteria defined below.

Basis for Conclusion

The VCA prepared a summary of the data collected from signatories' self-assessment surveys related to the Australian PVC industry's PVC Stewardship Program's Commitment and Verification Guide ("the PVC Industry Commitment and Verification Guide") for the year ended 31 December 2024. FCG reviewed the transcription of the Selected Performance Statements (listed in Appendix A) from VCA's internal systems to the PSP Report. In preparing the Selected Performance Statements, the VCA applied the requirements set out

in the PVC Industry Commitment and Verification Guide. Such The procedures performed in a limited assurance engagement vary Criteria were specifically designed for the preparation of the in nature and timing from and are less in extent than for a Selected Performance Statements and PSP Report. As a result, the reasonable assurance engagement. Consequently, the level of Subject Matter information may not be suitable for another purpose, assurance obtained in a limited assurance engagement is We conducted our engagement in accordance with Australian substantially lower than the assurance that would have been Standard on Assurance Engagements ASAE 3100 Compliance obtained had a reasonable assurance engagement been performed. Engagements ("ASAE 3100") issued by the Auditing and Assurance

Standard Board. We believe that the evidence we obtained is Use of assurance statement

sufficient and appropriate to provide a basis for our limited. We disclaim any assumption of responsibility for any reliance on this assurance report to any persons other than Management and the Directors of the VCA or for any purpose other than that for which it was prepared. Our review included web-based information that was

The VCA's management ("Management") was responsible for available via web links as of the date of this statement. We provide selecting the Criteria, preparing and fairly presenting the Subject no assurance over changes to the content of this web-based Matter in accordance with that Criteria. No conclusion is expressed information after the date of this assurance statement. as to whether the selected methods used are appropriate for the

purpose described in this report. VCA's responsibility includes Inherent limitations

establishing and maintaining internal controls, adequate records Because of the inherent limitations of any limited assurance review and making estimates that are reasonable in the circumstances. Our and the internal control structure, it is possible that fraud, error or responsibility was to express a conclusion on the transcription of the non-compliance with the requirements may occur and not be Selected Performance Statements from the VCA's summarised data. detected. While we considered the effectiveness of management's internal controls when determining the nature and extent of our

Our independence

assurance conclusion

Respective responsibilities

procedures, our assurance engagement was not designed to We have complied with the independence and relevant ethical provide assurance on internal controls. The scope of work covered requirements, which are founded on fundamental principles of the Subject Matter referred to above as included in the PSP Report. integrity, objectivity, professional competence and due care, Our procedures did not include testing controls or performing confidentiality and professional behavior. procedures on the underlying source data and information The firm applies Auditing Standard ASQM 1 Quality Management for including that provided to the VCA from signatories. Firms that Perform Audits or Reviews of Financial Reports and Other Financial Information, or Other Assurance or Related Services Engagements, in undertaking this assurance engagement

Our Approach

In a limited assurance engagement, the assurance practitioner procedures primarily consist of discussions and enquiries of management within the entity and, as appropriate, observations, gaining an understanding of processes, and evaluation of the evidence obtained. The procedures performed depend on our loshua Martin. Director judgement, including identifying areas where the risk of material non-compliance with the requirements is likely to arise. Our limited GEA 0188/2013 assurance procedures included: Melbourne, Australia Obtaining an understanding of the VCA's relevant systems and 20 May 2025 processes used for managing, analysing, summarising and reporting the Selected Performance Statements

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 Conducted interviews with key personnel responsible for collating and writing sections of the PSP Report to understand

the VCA's reporting processes and data checking and

Compared the transcription of the Selected Performance

Statements as detailed in Appendix A below in the PSP Report

to the summary of signatories' self-assessment responses in

the form of an Excel file provided by the VCA.

Appendix A - List of Selected Performance Statements assured as part of our limited assurance over the transcription and presentation of data from the Excel file provided by the VCA

The table below details the Selected Performance Statements assured as part of our limited assurance over the transcription and presentation of the data from the Excel file provided by VCA. Where a single statement has multiple data points that have been assured by ECG, the table below separates the data points into separate rows however maintains the same item number to indicate that they are of the Selected Performance Statement

ltem No.	Report section and page number	Transcribed statement		19	Program
1	Executive Summary Central	Number of signatories at CY24 year end: 48		Program	
2	Executive Executive	Number of signatories		20	Outcomes, p
2	Graphic, page 3	reporting at CY24 year end: 45		21	Program
3	Summary Central Graphic, page 3	Number of new signatories reporting at CY24 year end: 2			Outcomes, p
4	Executive Summary Central Graphic, page 3	Number of non-reporting signatories at CY24 year end: 3		22	Program Outcomes, p
5	Executive Summary Central Graphic, page 3	Number of reporting signatories achieving excellence at CY24 year end: 19		23	Program Outcomes, p
6	Executive Summary Central Graphic, page 3	Percentage of reporting signatories achieving compliance above 80% at CY24 year end: 89%		24	Program
7	Executive Summary Central Graphic page 3	Percentage of reporting signatories achieving compliance above 50% at CY24		24	Outcomes, p
8	Executive Summary Central Graphic, page 3	year end: 100% Number of independent verifications of reporting signatories at CY24 year end: 10		25	Program Outcomes, p
9	Executive Summary Central Graphic, page 3	Average compliance of reporting signatories at CY24 year end: 89%		26	Industry Developmen
10	Executive Summary Central Graphic, page 3	Year-on-year percentage decrease to volume of PVC recyclate consumption by reporting signatories from CY23 to CY24: 6.98%		27	Industry Developmen page 12
11	Executive Summary Central Graphic, page 3	Volume of PVC recyclate consumption by reporting signatories from CY23 to CY24: 2091 tonnes		28	Industry Developmen page 12
12	Executive Summary Central Graphic, page 3	Year-on-year increase in volume of DEHP/DOP consumption by reporting signatories from CY23 to CY24: 7.9%		29	Industry Developmen page 12
13	4	Number of PSP commitments at CY24 year end: 45			
14	Introduction, page 4	Number of PSP commitments at CY24 year-end contained in "Figure 2: Number of Reporting PSP Signatories over time": 45		30	Industry Developmen page 12

Program Number of signatories at CY24 year end: 48 Dutcomes, page Number of signatories Program reporting at CY24 year end: 45 Outcomes, page Percentage of reporting signatories achieving Program Outcomes, page 8 compliance above 80% at CY24 year end: 89% Percentage of reporting Program signatories achieving 18 compliance above 50% at CY24 Outcomes, page 8 vear end: 100% Number of independent verifications of reporting bage 8 signatories at CY24 year end: 10 Average compliance of reporting signatories at CY24 page 8 vear end: 89% Percentage of reporting signatories achieving 50% compliance at CY24 year end: page 8 100% Volume of PVC recyclate consumption by reporting page 8 signatories from CY23 to CY24: 2091 tonnes Volume of PVC recyclate sold to local businesses not part of the PSP at CY24 year end: 371 page 8 tonnes Volume of PVC recyclate consumption by reporting signatories from imported page 8 goods at CY24 year end: 1,418 tonnes Volume of domestic PVC recyclate consumption by reporting signatories in Figure page 8 3: Domestic Recyclate Consumption (tonnes) Volume of medical PVC collected by mainland nts. Australian facilities at CY24 year end: 133 tonnes Volume of medical PVC collected by mainland nts, Australian facilities at CY23 year end: 120 tonnes Volume of medical PVC collected by mainland Australian facilities at CY22 year end: 98 tonnes Year-on-year percentage increase in medical PVC collected by mainland nts. Australian facilities from CY23 to CY24: 10% Volume of medical PVC collected by mainland Australian facilities in Figure 5:

Medical PVC Waste Collected

(tonnes)

04 INTRODUCTION

- 06 SUMMARY OF COMMITMENTS
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31	Industry Benchmarks, page	Number of PSP commitments, number of reporting signatories and number of reporting signatories who achieved full compliance, partial compliance	45	Outcomes by Commitment, page 15	Year-on-year increase in average compliance for Commitment 3.1 Energy & Greenhouse Gas Emission from CY23 to CY24: 7%
	15	and non-compliant for each PSP commitment at CY24 year end in Figure 6: Outcomes by Commitment Graph	46	Outcomes by Commitment, page 15 Outcomes by	Average compliance for Commitment 4.1 Post Industrial PVC at CY24: 73%
32	Outcomes by Commitment,	Number of PSP commitments at CY24 year end: 45	47	Commitment, page 15	Commitment 4.1 Post Industrial PVC at CY23: 90%
22	Outcomes by	Year-on-year increase in average compliance for	48	Commitment, page 15	Commitment 4.2 Recycled PVC at CY24: 50%
33	page 15	Management Systems from CY23 to CY24: 7%	49	Outcomes by Commitment, page 15	Average compliance for Commitment 4.2 Recycled PVC at CY23: 40%
34	Outcomes by Commitment,	Year-on-year increase in average compliance for Commitment 2.4 Open	50	Outcomes by Commitment, page 15	Average compliance for Commitment 5.4 Modern Slavery at CY24: 82%
	page 15	Disclosure from CY23 to CY24: 3% Year-on-year increase in	51	Outcomes by Commitment, page 15	Average compliance for Commitment 5.4 Modern Slavery at CY23: 58%
35	Outcomes by Commitment, page 15	average compliance for Commitment 3.1 Energy & Greenhouse Gas Emissions	52	Outcomes by Commitment, page 15	Average compliance of reporting signatories at CY24 year end: 89%
36	Outcomes by Commitment, page 15	from CY23 to CY24: //% Year-on-year increase in average compliance for Commitment 5.4 Modern Slavery from CY23 to CY24: 23% Year-on-year decrease in	53	Scoring Breakdown, page 17	Number of reporting signatories and individual signatories and individual signatory average compliance at CY24 year end in "Figure 8: Individual Signatory
37	Outcomes by Commitment, page 15	average compliance for Commitment 2.2 Recycling PVC with Legacy Additives from	54	Scoring Breakdown, page	Compliance" graph Number of signatories reporting at CY24 year end: 45
38	Outcomes by Commitment, page 15	Year-on-year decrease in average compliance for Commitment 2.3 Plasticisers from CY23 to CY24: 4%	55	Scoring Breakdown, page 17	Percentage of reporting signatories achieving compliance above 50% at CY24 year end: 100%
39	Outcomes by Commitment, page 15	Year-on-year decrease in average compliance for Commitment 4.2 Recycled PVC from CY23 to CY24: 10%	56	Scoring Breakdown, page 17	Percentage of reporting signatories achieving compliance above 80% at CY24 year end: 89%
40	Outcomes by Commitment, page 15	Average compliance for Commitment 1.1 Quality Management Systems at CY24	57	Scoring Breakdown, page 17	Average compliance of reporting signatories at C24 year end: 89%
41	Outcomes by Commitment, page 15	year end: 100% Average compliance for Commitment 1.6 Wastes & Effluent at CY24 year end: 93%	58	Benchmarks, page 18	Number of reporting signatories and their corresponding compliance award at CY24 year end in
42	Commitment, page 15	Commitment 5.2 Supply Chain Mapping at CY24 year end: 89%	L	L	"Bencrimarks" table
43	Outcomes by Commitment, page 15	Average compliance for Commitment 2.2 Recycling PVC Containing Legacy Additives at CY24: 47%			
44	Outcomes by Commitment, page 15	Average compliance for Commitment 2.2 Recycling PVC Containing Legacy Additives at CY23: 58%			

GLOSSARY

BEP	Best Environmental Practice PVC
DCCEEW	Department of Climate Change, Energy, the Environment, and Water
DEHP/DOP	Diethylhexyl phthalate (otherwise known as dioctyl phthalate), a low molecular weight phthalate plasticiser currently listed under REACH 'Substances of Very High Concern'
E-PVC	Emulsion PVC
GBCA	Green Building Council of Australia
LMW	Low Molecular Weight
PSP	PVC Stewardship Program
PVC (Vinyl)	Polyvinyl Chloride
Recyclate	Used to refer to externally sourced pre- and/or post-consumer recycled PVC
Signatories	VCA members currently voluntarily undertaking the PVC Stewardship Program
S-PVC	Suspension PVC
Stabilisers	A compound used to improve the PVC thermal stability during processing and the weathering and/or UV stability of the end-use product
TSG	Technical Steering Group
VCA	Vinyl Council of Australia
VCM	Vinyl Chloride Monomer



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