

Joint statement

Nordic Swan misses an opportunity to offer consumers reliable information on PVC flooring

The Nordic Swan states that its goal is to “enable consumers and professional buyers to choose the environmentally best goods and services by giving an effective tool to help companies develop more sustainable products and services”. Yet by excluding PVC from its proposed requirements for floor coverings and flooring underlays Version 7.0 without strong arguments, it misleads consumers and professional buyers and creates an unlevel playing field.

Not only do the proposed requirements themselves choose to dismiss PVC flooring without strong arguments, but the underlying rationale, as presented in the NMN basis for the decision document and subsequent Board minutes, reveals a very problematic thinking on PVC, which seems to favour protecting its reputation and certain customers producing alternative products rather than abiding by sound scientific arguments to provide trustworthy information.

Three points will be elaborated in this paper:

- Reputational arguments have no place in a trustworthy certification
- The use of demonstrably false scientific arguments dismisses the real progress made by the PVC industry in developing more sustainable products
- Double standards in requirements mislead consumers

1. Reputational arguments have no place in a trustworthy certification

The NMN “basis for the decision” document which led to the decision by Nordic Swan national boards to exclude PVC states that the decision to include PVC presents a “risk of negative reactions from the market (for instance producers who have developed alternative products)”, and “challenging communications if we include PVC (PVC reputation as a material is still tarnished)”. It adds that “there is a clear risk that the trustworthiness of the Nordic Ecolabel would be undermined if Nordic Ecolabelled vinyl flooring were to be found on the market.”

Yet shouldn't the bigger risk to trustworthiness be to mislead consumers by providing outdated information on a product instead of challenging consumers' perceptions and informing them about the true sustainability performance of said product?

Moreover, is it the role of a trustworthy certification to protect the business of “producers who have developed alternative products”, rather than to equally assess and promote the most environmentally sustainable products?

To be trustworthy, we believe the Nordic Swan Ecolabel should provide an objective assessment of floor coverings and flooring underlays, without bias or double standards, so that the consumer can make the right choices.

Excluding PVC based on reputational concerns, instead of assessing it against strict requirements as is done with other materials where concerns have been raised (laminates, melamine), risks misleading consumers and undermining the trustworthiness of the Nordic Swan Ecolabel.

2. The use of demonstrably false scientific arguments dismisses the real progress made by the PVC industry in developing more sustainable products

The proposed requirements for floor coverings and flooring underlays Version 7.0 motivates the decision to exclude PVC based on the following scientific arguments:

a. The environmental problems caused by PVC manufacture.

This argument seems to be linked to the use of mercury in the production process. Yet, as acknowledged by the NMN “basis for the decision” document, “the use of asbestos or mercury diaphragms to produce chlorine gas has been phased out by the industry in Europe and replaced by the more energy-efficient membrane cell technology.” This is therefore a false argument.

b. It is difficult to achieve complete traceability regarding where the PVC has been manufactured.

This is false, given that within the EU, manufacturers have to produce documentation on their products.

The justification then invokes three arguments linked to recycling:

c. Recycling of post-consumer flooring is very limited in the Nordic countries. It is partly the problem of additives that means that recycling does not work. Flooring has a long service life and old flooring that is taken up may contain cadmium and lead which were used as stabilisers, pigments, etc. Adhesive residues and the fact that the base “comes too” when flooring is taken up are additional problems.

d. Used PVC flooring incinerated in waste incineration plants is associated with difficulties. Large amounts of neutralising lime must be added to protect the equipment and to keep emissions within the limit values. It increases the costs of incineration and for handling the waste product, which is classified as hazardous waste.

e. Not all the Nordic countries allow incineration of used PVC. Denmark has waste legislation which states that all PVC must first be sorted for material recovery. Because this does not exist in practice for vinyl flooring, used vinyl flooring ends up in landfill. The Nordic Ecolabel finds it hard to accept Nordic Ecolabelled products going to landfill.

Yet on recycling, it is important to state that:

- a. PVC flooring is the first and most recycled plastic flooring on the market. As such, accepting that other flooring products are landfilled, but not PVC, creates a blatant double standard.
- b. Cadmium and lead were phased out a very long time ago in flooring and are not a significant issue in recycling PVC flooring.
- c. Whilst the recycling of PVC containing legacy substances is a challenge, the industry is investing massively to innovate in this area (see projects such as Revinylfloor).

- d. Modern incinerators have the capacity to deal with PVC waste.
- e. New technologies are being developed in waste-to-energy plants to enhance the sustainability of the process (see [Halosep](#)).

Finally, the document states that “Nordic Ecolabelling’s attitude is rather that PVC is not a sustainable material in flooring, whether or not harmful additives are substitute”. Yet this assumption is not supported by the facts.

3. Double standards in requirements mislead consumers

Many of the “issues” raised for PVC are not PVC-specific. Therefore, excluding PVC, while other products are permitted to be assessed against strong requirements, creates double standards that are detrimental to the consumers.

Examples of requirements which could be used to ensure that Eco-labelled PVC is truly sustainable, and that are already used for other products, include:

- Description of the product, of the production process and overview of chemicals
- Share of renewable/recycled raw materials
- Chemicals requirements (which include prohibited chemicals)
- Circular requirements (including recyclability)
- Innovation requirement

As an example, the Nordic Swan criteria on [buildings](#) have an exception for PVC flooring in certain applications, which shows that PVC flooring can meet strict requirements.

As stated by the Swedish Nordic Swan’s board, “Ecolabeling should promote the best products in the category and set uniform requirements for all floor types”, and therefore, Ecolabelling of PVC should be possible if strict requirements are met. Such an approach would create a truly non-biased tool for consumers to choose the best environmentally sustainable products to fit their needs.

The use of PVC flooring is on the rise, which incidentally shows that the consumer’s perception of PVC is changing. As PVC flooring meets several unique performance requirements, it is in certain applications the soundest choice. Today, the Nordic Swan has a huge opportunity to ensure that sustainable PVC is used. To do so, PVC must be included in the requirements for floor coverings and flooring underlays. Excluding PVC based on reputational concerns would be a significant missed opportunity to inform consumers and promote sustainable solutions.

Signatories:

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