

SELECT BREAKOUT GROUP WHITE PAPER and FACILITATOR NOTES

Market Drivers Breakout Group: Facilitator – Lisa Dally Wilson, Dally Environmental

1. What alternatives (solutions) are most needed [case by case basis]
2. Where in the supply chain is the best place to intervene. How to communicate/ educate up and down the supply chain from there.
3. What are the alternatives: (a) alternative pigments, (b) alternative processes for making the same pigments, (3) change in market demand for color
 - a. Bring PCB-11 down to 1 ppm in pigments (to reduce impacts to recycling industry and downstream products) eg, hydromulch (consider process waste)
 - b. Increase public awareness – re. PCB in product and push market
 - c. Social media outreach by large corporations to brand themselves “sustainable” target circular economy.
 - d. Go back – consider multi-stream/segregated recycling
 - e. ID low hanging fruits
 - f. Printing consultations to include informing clients of environmental consequences of their choices (eg, pigments, outcomes). Educate customers.
 - g. Stakeholder to align on FACTS – agree on what alternatives apply and in what circumstances
 - h. Is it possible to do less – do big purchases require elaborate packaging?
 - i. Reduction in packaging and print on packaging in the waste stream (cradle to grave) – less pigments to begin with
 - j. Educate National Brands – re. “environmental certification
 - k. Consider that there are other alternative solutions if there are other sources of which we are unaware
 - l. Public Awareness Campaign – re. PCBs in inks, consider having Ecology do this, statewide
 - m. Can we start with changing pigment use in products that don’t need durability, eg, newsprint (early, low hanging fruit)
 - n. EDUCATE SUPPLY CHAIN – re. what is in your product (MSDS)
 - o. Set a goal for pigments and inks that are achievable (1 ppm in pigment, 0,1 ppm in ink). Communicate this and ensure use of high quality components in the pigment and ink manufacturing
 - p. Focus on existing processes and products
 - q. Do a complete alternatives assessment to ensure alternatives are functional
 - r. Intervene at BRAND LEVEL – large corporate level, consider environmental incentives possibly resulting in Market “de-selection”

Regulatory Breakout Group #3: Facilitator – Kara Whitman, WSU

1. Regulatory issues/policies – opportunities to improve

- Revise TSCA/CWA
- Change WQS to look at PCB Congeners
- More Global regulations (REACH)
- Need open communications between FDA and Ecology to align TSCA
- Seems to be top down approach, needs to be a bottom up approach.
- Set more attainable goals, Agency can mandate a goal and provide guidance and other resources to help in reaching that goal.
- Holistic View – challenge regulatory agencies to consider a more holistic view of the environmental, time-cost-benefit and socio-economic effects of implementing their conflicting regulations (TSCA /CWA, State recycling laws/WQS, etc.). Roger of Kaiser provided an example of how this was done by EPA back in the 1990's under a multi-media permitting process.

2. Can regulation lead to innovation?

- Set attainable goals in regulating and let industry drive solutions
- Change needs to be market driven (can be done partly through legislation, PCB purchasing policy)
- Regulation stifles innovation – incentives work better for innovation
- Use incentives to drive innovation – financial, variance or other mechanisms to allow the space for innovation.
- Stepwise regulation

3. Where to intervene:

- Pigments, SP-WA Inks?
- Need some level of disclosure from pigment manufacturers
- Supply chain both and ingredient level and at end use
- Brand owners drive all!

NOTES FROM DISCUSSION DURING REPORT OUT:

One thing that did not seem to surface from the Regulatory Drivers breakout groups, but I think is pertinent- the possibility of treating mono- and di- chlorinated compounds separately (as does TSCA). I don't think this can be done until USEPA and NIH finish some of their risk assessment work, but this could be considered as a possible solution to the inconsistency between TSCA and WA WQS. (DK, October 9, 2019).

Procurement Breakout Group: Facilitator – Kat Compton, EPA

1. Who should adopt procurement policies on iPCBs? What impacts do those "higher up the food chain" have?
 - HP, government, packaging manufacturers

- Big companies with leverage

- Seems like chicken and egg - tug of between brands and manufacturers.
- Manufacturers could provide information or develop classes of no/low PCB products
- Manufacturers can be educators- but there's risk in developing a new product without a known market
- Brands will find manufacturers/suppliers that can meet their specs
- Customer demands drive the market
- Have to consider end uses - eg. Impacts to recycling markets

2. What makes a successful procurement policy?

- Has to be feasible, with exemptions for small businesses
 - What level do you pick? What does feasible mean?
 - Need to balance PCB standard with other procurement criteria
- Communication across silos (ex: enterprise services and DOT) so there is consistent implementation
- Everyone is working with the same information

3. Do we need a universal policy? Or is it context specific?

- Universal standard would provide some market protection - brand retention
- But could be hard to meet/unfeasible in some categories
- Media specific method detection limits depend on what you're testing
- Geographic specific - what are the economic and environmental needs of a State?

Needs:

More data - eg. Product testing

Data transparency - how do products in the same class compare?

Low cost testing, or different testing methods - need test accuracy to ensure trustworthiness