The Business Roundtable

POSITION PAPER ON POLLUTION PREVENTION
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Background

Industry has historically worked to maximize the efficient use of resources (materials, labor, energy, etc.) needed for the manufacture of its products. Techniques such as recycling, improving operational procedures, modifying processes and even developing new technologies have all been used to reduce the amount of resources needed to produce a product. In recent years, "pollution prevention" has become a key objective in improving environmental performance. Many of the same techniques used to maximize resource utilization can be used to reduce the environmental impact that manufacturing facilities can have on the environment. Industry has taken steps to focus on and provide the organizational support necessary to promote pollution prevention.

Federal and state governments have or are in the process of adopting legislation and regulations that are meant to encourage this concept. However, it is becoming clear that many of these new requirements are prescriptive in nature and tend to add nonproductive elements to the pollution prevention process. Regulatory-driven reporting requirements, process requirements, record keeping, and prescribed methods of reduction all have the potential to restrict pollution prevention progress and stifle the creativity and innovation needed for substantial progress.

Current Actions

The Business Roundtable recently conducted a detailed benchmarking study of six industrial manufacturing facilities that met its criteria as having Best-in-Class pollution prevention programs. This study clearly demonstrates that while there are many similarities in these facilities’ pollution prevention programs, the true effectiveness of their efforts is in the ability to work within their own organizational culture to add a high degree of uniqueness to the basic pollution prevention framework.

Some of the findings of this benchmarking study are:

• Facilities did not seek to change their culture but rather integrated the pollution prevention initiative into that existing culture.

• There was strong support for pollution prevention activities from both corporate and facilities management and an organized effort to motivate employees to suggest and/or implement pollution prevention initiatives.

• Facilities were successful when they were not told how to approach pollution prevention.

• Facilities integrated pollution prevention into their existing business planning procedure rather than relying on separate pollution prevention plans.

• Facilities had the ability to report progress against selected goals or initiatives on a-monthly to quarterly basis. All facilities identified and tracked wastes, but did not necessarily measure the individual waste streams.
In order for a facility to be able to sustain a pollution prevention program, the projects had to be, on the whole, cost effective. Pollution prevention projects, unlike compliance projects, had to compete in the normal capital allocation process.

- No facility relied exclusively on source reduction techniques to achieve pollution prevention and all facilities included recycling and reuse in their pollution prevention efforts.

- Facilities had extensive employee training procedures which included an environmental focus but none had implemented separate formal pollution prevention training.

- The opportunity for chemical substitution was greater at facilities that used chemicals in their processes as compared to facilities that manufactured chemicals.

- Driven by government regulations, facilities spent more resources on compliance activities than on pollution prevention activities. All of the facilities expressed the desire to move the balance of resources toward pollution prevention.

**Future Actions**

The results of this benchmarking study clearly show that many industrial facilities have implemented highly successful pollution prevention initiatives. However, when these successful industrial initiatives are compared with some of the existing and proposed legislation, it is clearly evident that some of these legislative requirements are not consistent with the sound and effective industrial pollution prevention practices that have been implemented.

The Business Roundtable recommends that in order to gain the maximum environmental benefit, legislation and regulations dealing with pollution prevention should provide a framework rather than a detailed blueprint to pollution prevention. The following are specific suggestions:

- Pollution prevention should be viewed as an attitude rather than a specific program with prescriptive requirements. New and existing laws, regulations and policies should be formulated in ways to facilitate and support pollution prevention rather than establishing specific pollution prevention requirements.

- The definition of pollution prevention must include out-of-process recycling and reuse. The other elements of the waste management hierarchy (i.e., treatment and disposal) must continue to be made available for waste that can not be feasibly eliminated.

- Government regulation should not prescribe given measurements, but rather individual facilities should develop their own measurements which would vary according to process and products.

- Facilities should be encouraged to incorporate pollution prevention into their existing business planning processes as an alternative to being required to prepare specific pollution prevention plans.