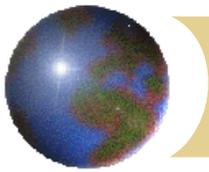


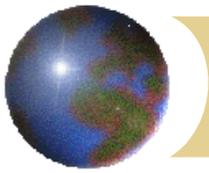
Toxics Use Reduction – a perspective from hindsight

Stephen Greene
For TURI
November 4, 2009



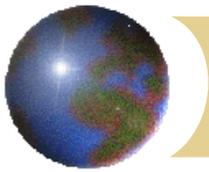
Overview

- ✚ Personal involvement in the negotiations 1988
- ✚ TURA and TWRP were important business issues
- ✚ Digital
- ✚ Polaroid
- ✚ Looking back



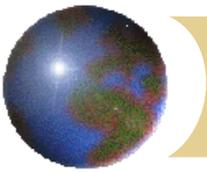
The base issue

- ✦ For Digital it was a competitive issue for a Massachusetts based company
- ✦ The potential operational impacts
- ✦ For Polaroid, TURA was already part of Polaroid's TWRP (Toxic Waste Reduction Program)
- ✦ For both, Intellectual Property and business impact were concerns



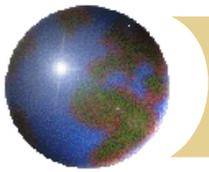
The Challenge for a MA based Company

- ❖ A single state law puts a company at a disadvantage in a national or global economy
- ❖ The more information that is required, the greater the risks that critical IP will be compromised
- ❖ Politics and legislation are a slow, painfull process



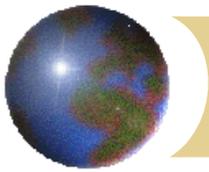
Looking back

- ❖ REACH and TSCA reform have us in a much different place
- ❖ In their days, waste minimization, EPCRA/TRI and Montreal Protocol were significant steps
- ❖ Change is hard especially if you are invested in the past



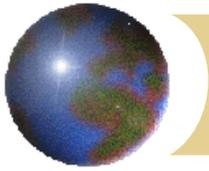
Business success

- ✚ Businesses need to sell products or services
- ✚ The conflicting issues of
 - ▣ the level playing field
 - ▣ Not in my neighborhood or state
 - ▣ Off shoring of production



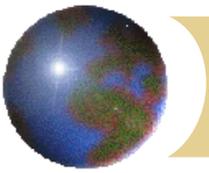
Politics is a Contact Sport

- ✚ Initial environmental regulations were reactionary and media specific
- ✚ Fostered an end of pipe approach
- ✚ Take it out of here but don't put it there
- ✚ TURA started us on the path to examining the process



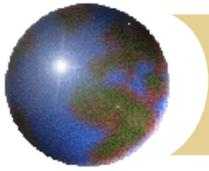
TURA – a new approach

- ✦ While TURA is a law and corresponding legislation it did -
- ✦ Created OTA and TURI as non regulatory assistance and research groups



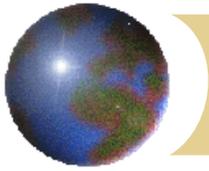
Digital and TURA

- ❖ Was a good corporate citizen before it knew what it meant.
- ❖ Negotiated because of the potential business impact in Mass
- ❖ TURA was an initiative occurring at a time that favored initiatives.
- ❖ TURA was not something DEC would have initiated



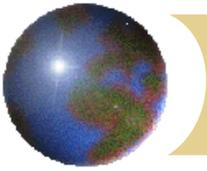
Polaroid and TURA

- ❖ Polaroid was already ahead of TURA with its Toxic Waste Reduction Program –TWRP
- ❖ TWRP was fairly complicated, used indexes to protect IP/business info but show progress
- ❖ Recognized the importance and limits substitutes
- ❖ Included design and related manufacturing
- ❖ Had a significant budget



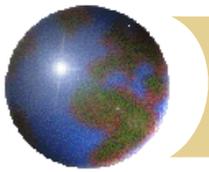
Polaroid and TURA (con't)

- ❖ TWRP had an expert team and significant staff
- ❖ TURA was an additional cost and reporting requirement
- ❖ TURA Fees were about \$200K per year and staff requirements were about the same



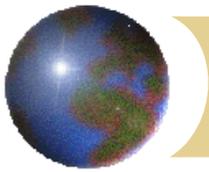
TURA – the good and the bad

- ✚ Forced a thorough look at the production process
- ✚ Planning and review were part of the system
- ✚ Lost ground when planning become the objective until ammendments
- ✚ The fees have become a “tax”



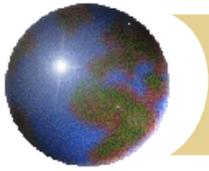
TURA Blue Ribbon Panel

- ❖ Slow to recognize that there is more than toxic chemicals to worry about
- ❖ Business needs to be competitive
- ❖ Chemicals were not the only impact



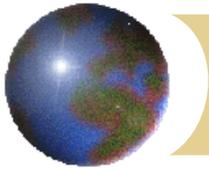
REACH

- ❖ One of the issues that kept bubbling up in TURA discussions was toxics in products.
- ❖ What ever the solution, it needs to be broad at the national and preferably international level and deal with IP
- ❖ The EU REACH regulation is another example of regulating the product, rather than the process



Thank You for your time

- ✚ We have come a long way but the journey has just begun
- ✚ Questions?



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