



GREAT LAKES UNITED

Governor Tommy Thompson, Chairman
Council of Great Lakes Governors
35 East Wacker
Suite 1850
Chicago, IL 60601

April 5, 1991

Dear Governor Thompson:

We are writing you to express our encouragement and support for the efforts of the Great Lakes Governors to promote pollution prevention programs within the Great Lakes Basin.

As you know, one of the guiding principles of the Great Lakes Water Quality Agreement, signed by the United States and Canada in 1978, is zero discharge and virtual elimination of persistent toxic substances. The 1986 Great Lakes Toxic Substances Control Agreement commits the States to "virtually eliminate the discharge of all persistent toxic substances", and to prohibit the discharge of other toxic pollutants in toxic amounts. We strongly support and commend the goals of these agreements.

In order to significantly reduce levels of the broad range of toxic pollutants in the Great Lakes Basin, and achieve the goals of zero discharge and virtual elimination for the persistent toxic substances, we must have effective pollution prevention policies and programs. Pollution control alone will not effectively address the toxic threat facing the Great Lakes ecosystem. We need pollution prevention.

This year, Great Lakes United launched a new Pollution Prevention/Zero Discharge Project to promote policies, programs, and actions by government and industry that will prevent the generation of toxic chemical pollution and achieve zero discharge in the Great Lakes Basin. During 1991 the Project will: research and publicize pollution prevention "success stories" (examples of relatively successful pollution prevention efforts carried out by private corporations, communities, and governments); hold six community training workshops to assist environmental and labor leaders in their efforts to promote pollution prevention programs; publish two citizen guides to pollution prevention; and host a Great Lakes Basin Citizens' Conference on Pollution Prevention and Zero Discharge. Needless to say, Pollution Prevention is one of

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our organizations highest priorities.

It is our belief that State governments have a unique opportunity to effectively put in place programs to achieve pollution prevention success within the Great Lakes Basin. National and International agreements provide a useful framework and guide for actions, but it is at the state and county level that some of the most effective and practical results can be achieved. We suggest that a good State pollution prevention policy and program needs several components to be effective:

- * **a strong emphasis on toxics use reduction as the most proactive pollution prevention strategy.** Toxics use reduction requires changes in production processes, products, or raw materials that reduce, avoid, or eliminate the use of toxic or hazardous substances and the generation of hazardous by-products per unit of production.
- * **general and specific reduction goals and targets.** Quantitative reduction goals for the use of toxics and the generation of associated wastes for facilities as a whole and for each production process must be established. Statewide reduction goals would also help guide efforts.
- * **technical assistance programs.** Onsite assistance and consultations at facilities; grants and loans to help deserving firms make necessary investments in economically viable toxics use reduction programs; and cooperative toxics use reduction research, development, and demonstration programs between universities and facilities can all be useful in promoting pollution prevention.
- * **regulatory authority to promote toxics use reduction and enforce toxics use reduction plans.** Toxics use reduction should be incorporated into existing pollution control permitting programs as the preferred strategy for reducing toxic exposures.
- * **worker and community involvement.** Allow workers and community residents to participate in and monitor facilities' toxics use reduction efforts.
- * **dedicated source of funding.** Pollution prevention and toxics use reduction programs need dedicated sources of funding through fees or taxes.
- * **link between pollution prevention and economic development activities.** Environmental concerns must be introduced into how industries work from the "get go", and the staff of state economic development agencies must be totally on-board with the pollution prevention and toxics use reduction programs.

We encourage the Great Lakes Governors to work closely with the

provinces of Ontario and Quebec to ensure that these programs are in place throughout the region and that good efforts in one jurisdiction are shared elsewhere.

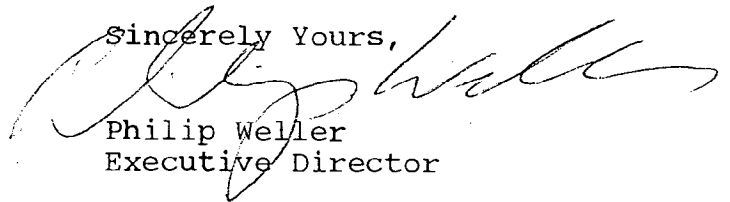
We recognize that in order for states to institute effective pollution prevention policies and programs, the federal government's support and regulatory role must be greatly strengthened. We encourage you to work together to promote Federal programs which:

- * dramatically increase funding to states for pollution prevention programs.
- * develop a process for sunsetting or phasing out the production and use of the worst persistent toxic substances.
- * greatly expand the list of chemicals targeted for use reduction. The 15 to 20 chemicals targeted in the National Pollution Prevention Strategy released by EPA in January are only a small percentage of the toxic substances used by industry, and do not include those toxics of the greatest concern in the Great Lakes.
- * develop uniform systems for measuring toxics use and hazardous waste reduction.
- * provide assistance for the adoption of pollution prevention programs by industry.
- * develop source reduction training programs for state agency and industry personnel.

It is our belief that there is a significant opportunity to include zero discharge and pollution prevention in the revisions of the Clean Water Act and the Resource Conservation and Recovery Act as congress reauthorizes them during the coming year. We hope that the Great Lakes States will support inclusion of strong pollution prevention provisions in this legislation.

In closing we would like to commend the Great Lakes States for the initiatives that you have already taken to promote meaningful pollution prevention and encourage you to ensure that pollution prevention achieves the goals of the Great Lakes Water Quality Agreement and the Great Lakes Toxic Substances Control Agreement.

Sincerely Yours,



Philip Weller
Executive Director