

**Dow Canada**

Dow Chemical Canada Inc.
Vidal Street, P.O. Box 3030,
Sarnia, Ontario N7T 7M1
Canada

December 9, 1991

Fax to:
Mr. Joel S. O'Connor 5171
Ocean Policy Coordinator
United States Environmental Protection Agency

212-264-2194

Dear Mr. O'Connor:

In your November 27, 1991 memo you asked for some thoughts regarding responsible stewardship indicators for Lake Ontario as preparation for our meeting in early 1992. My preliminary thoughts are attached.

At this point, these are not views that I would say are reflective of any official position within my company. You may distribute them as you see fit to other members of the Sub-Committee as my own thoughts. I would add that within Dow we have had a Product Stewardship commitment in place for many years. In this program we are required to assess the health and environmental impact of each of our products and take appropriate steps to protect employee and public health and the environment. Does this fit with your definition of Stewardship?

I look forward to our meeting in Buffalo.

Sincerely,

George N. Werezak
Manufacturing Manager

File: EOWG Sub-Comm.

Attach.

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THOUGHTS ON RESPONSIBLE STEWARDSHIP INDICATORS FOR LAKE ONTARIO

The starting point I used is the Joel O'Connor letter to G.N. Werezak of November 4, 1991. There are a number of other studies on indicators but most focus on physical indicators. The suggestions in this letter is that the indicators must be:

- measurable
- designed to show progress opposite the stewardship objective that human activities and decisions embrace environmental ethics and a commitment to responsible stewardship.
- might be a measurable feature that shows:
 - evidence of ecosystem quality
 - future trends in quality
- may show responses to stressors, exposure to stressors and stressors themselves.

If the above are solely to be the criteria by which responsible stewardship indicators are selected, then they would primarily focus on the broad range of physical measurements. These physical elements seem more relevant to the first four objectives as documented in the March 1990 report of the Ecosystems Objectives Working Group. For our Sub-Committee, the letter suggests that Stewardship indicators might more appropriately focus on factors such as education, economics and values. One suggestion given was that an "index of sustainable economic welfare" might be used.

From the above, I would offer that some appropriate stewardship indicators for corporations could be:

- The number of corporations that have voluntarily committed to reduce their emissions to Lake Ontario.
- The amount of capital corporations have spent on environmental improvements as a percent of invested capital.
- Are corporate decisions being made using the principles of Sustainable Development?
- Have corporations and their trade associations adopted voluntary programs such as the Responsible Care programs of the Canadian Chemical Producers Association and the Chemical Manufacturers Association?
- What do the emissions of these corporations show?

These are a few that would deal with the impact of a corporation on Lake Ontario.

Another aspect of the corporation and its relationship with Lake Ontario is the health of the corporations. Perhaps this could be discussed at the first meeting but it is important to know the degree to which industrial viability will be factored into any suite of indicators. Corporate relocations to or away from Lake Ontario, the number of jobs in industry, profit levels, etc. are a few possible indicators.

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I have not thought through the role of governments in this area. Do consistent standards need to be factored in? Is the call for a level playing field somehow an indicator that has a Stewardship component that fits here? Perhaps as our task is developed at our first meeting some of these questions will get answered.

A recent report from Environment Canada gives a snapshot of the effort now underway to develop indicators. A few of these are given on a per capita basis. Would we want to use a similar approach?