

**SPEAKING NOTES**

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**Re-Tooling for Sustainable Development**

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**Prepared by**

**Paul Muldoon  
Counsel**

**Canadian Environmental Law Association  
517 College Street, Suite 401  
Toronto, Ontario  
M6G 4A2**

VP :

CANADIAN ENVIRONMENTAL LAW  
ASSOCIATION.

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## **1. Introduction**

Thank you for the invitation to make some remarks on the concept of pollution prevention. The term "pollution prevention" remains one of the perplexing terms in the environmental field. Everyone agrees that it is a concept worthy of consideration although there may be little consensus on what the term means, its implications and how to implement it.

Over the next few minutes then, my task to attempt to provide a clearer picture of this term from the perspective of the environmental community. The starting place for this discussion must be at the most basic question: what goals are we striving for?

First of all, it should be made perfectly clear what are not the goals or objectives hidden behind the concept of pollution prevention.

The intent is not want to take actions that will result in job loss. We want to retain jobs - jobs that contribute to the viability of communities. Jobs where employees can work in an healthy workplace environment.

The intent is not a conspiracy to close down industry. In many respects, through our proposals, the goal is to save the industrial sectors by making them more efficient, more innovative and more competitive.

The intent is not to add more costs to production. We want to save costs through better efficiencies, lower operating costs and a reduction in liabilities.

The intent is not to encourage industry to control pollutants at the end of the pipe. Instead, the real solution is to find a way to deal with at a the source to avoid the problem all together.

In short, we want cleaner production processes through a new industrial strategy for Canada. The cornerstone of this new industry strategy, in our view, is called pollution prevention.

No doubt, many of you will be asking what right to we as environmentalist have to talk about industrial strategy. Barry Commoner in his simple eloquence simply stated in 1987:

decisions that govern environmental quality originate in the economic realm,  
and are translated into the design of productive technology

If Canada wants to achieve the goal of better protection of the environment, it will be necessary to be more focused on making the right economic decisions and thinking through better technological decisions.

## 2. Definition

If the term "pollution prevention" is then framed in the context of an industrial strategy, how do we define this term?

First, let us be perfectly clear in terms and unequivocal in intent. Pollution prevention must be defined strictly and narrowly. It means measures used to change the process, the product or the raw materials that will avoid the use or creation of pollutants. If toxic management strategies intend to deal with toxic substances from "cradle to grave," pollution prevention measures must be equated with contraceptives.

For example, for users of toxic chemicals, it means replacing those substances with benign alternatives so that such substances are simply not used. The replacement of chlorinated solvents used for cleaning purposes in an industrial facility for a benign alternative such as a detergent product, the replacement of CFCs in the making of various products or the use of chromium in oil refineries are illustrations of the point.

It may mean changing an industrial feedstock or redesigning a process so that a substance is not generated. For example, progress in the reduction or elimination of chlorine in the bleaching of paper is a classic example of this case.

It may mean simply replacing certain products on the market altogether, such as toxic wood preservatives.

In many instances, the answers are not technological. There are a whole array of activities that can undertaken under the title of Integrated Pest Management to severely reduce or avoid the use of pesticides.

There are three basic reasons for this stringent definition.

1) First, the narrower the definition, the less toxic substances will be used and generated and thus, greater the environmental protection of Canadians.

1) Second, pollution prevention is different from pollution control since it talks to process change and examining alternatives to feedstocks, raw materials and inputs. Only a narrow definition will promote and encourage the change of this focus. Only with this narrow change will the mindset of all concerned have the singleness of purpose necessary to further the concept. Without a stringent definition, it will be business as usual.

3) Third, it is only by taking a stringent definition that it is possible to move the issue from an environmental add-on to an industrial policy. In other words, the concept would be seen as a legitimate or necessary of element of business modernization and investment decisions.

### **3. Components of Pollution Prevention**

What then are the components of pollution prevention incorporating the framework mentioned above?

There is little time to get into depth, so let explain my 5 point pollution prevention program.

**(A) Pollution Prevention as a National Policy** The first step is to have basic consensus to arrive at a national policy for pollution prevention. This policy would not only create a level playing field but allow the use of common language and common understanding of the goals of pollution prevention. . As such, part of this national policy would include a series of goals and objectives that would assist in adjudging performance in assisting progress along the way.

**(B) Sunset Protocol For Persistent Toxic Chemicals** - The second component is the establishment of a process that would phase-out the use and generation of the bad or worst actors substances - substances that persist and bioaccumulate in the fat cells of fish, wildlife and humans.

**(C) Pollution Prevention Planning** - One of the most important components of pollution prevention is a measure called pollution prevention planning. In effect, environmentalists are asking industry to undertake a very fundamental task: pretend that you are starting from scratch and there were no limits but your imagination. This component would require industry to develop a plan to re-think the production process so as to avoid the use or generation of toxic chemicals. It is a re-engineering process based on pollution prevention.

Pollution prevention planning generally does not require that the pollution prevention plan be immediately implemented. Instead, there is the assumption that the inherent environmental benefits, costs savings and enhance occupation safety aspects of the plans would promote implementation. However, there should be provision to develop performance standards based on the success of the pollution prevention plans.

As experience from some of the 23 U.S. states that have gone this route, it does work. It is providing a competitive edge to certain industrial sectors.

#### (D) Other Components

In addition to these components, there are a number of other components worthy of mentioning, including:<sup>1</sup>

- \* worker and environmental rights;
- \* expansion of the National Pollutant Release Inventory to monitor progress on pollution prevention activities; and
- \* technical assistance (whole range from financial incentives, tax breaks, selective subsidies).

#### 4. Implementing Pollution Prevention

When speaking about pollution prevention, my experience is that the implementation

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<sup>1</sup> Many other components are laid out in a document endorsed by over 50 non-governmental groups called: The Canadian Environmental Protection Act: An Agenda for Reform (1994).

of the approach is more controversial than its content. The two points of debate are as follows:

**Use versus Release:** Often it is suggested that the goal of pollution prevention is to reduce emissions of toxic substances. In my view, although this is a worthy goal, the focus of pollution remains on reducing the use and generation of toxic substances through process change rather than emissions reduction.

**Voluntary Action versus Regulations:** Perhaps the most controversial issue is that the view the pollution prevention imports the notion of voluntary action. Again, it is fair to say that traditional "command and control" has not worked. However, it is not the "command" part of command and control that has failed, it is the "control" part.

Hence, the key is to develop a legislative framework that focuses on "command-and-prevent." One component of "command-and-prevent" is arriving at objectives and targets that are mandatory with industry figuring how best to arrive at those goals.

This is not to say the voluntary action by industry is not appropriate or even desired.

What the point is that there is the need for a legislative framework for these actions that describes definitions, goals and benchmarks that allow a clearer direction of where we are going and what is expected.

## **5. Next Steps**

In these few short minutes, a broad framework for pollution prevention has been presented. It is submitted that this framework will yield economic, environmental and



social benefits to Canadians.

The question is though where do we go from here? My suggestions are as follows:

1. It is imperative that the concept of pollution prevention become an industrial strategy for Canada pervading all government ministries;

2. The Canadian Environmental Protection Act be reformed to incorporate and further the pollution prevention concept. A position paper called the Canadian Environmental Protection Act: An Agenda for Reform , which is endorsed by over fifty non-government groups, lays out some of these reforms.

3. The develop of transition strategies so that all stakeholders, -communities, workers, and industrial decision-makers, discuss the choices ahead in implementing the concept and ensuring the implications of those decisions are understood.

This is an ambitious agenda, but an agenda that is required for the protection and preservation of the Canadian environment.

