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What We Have Heard to Date

GLBTS Substance/Sector Work Group

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Summary

- To date, numerous teleconference calls and meetings have been held regarding the newly formed Substance and Sector Groups
- Very valuable input has been received through participation and correspondence
- Input will be considered as we move forward with the work of these Groups
- Following slides outline what we have heard to date
- Purpose of presenting this summary is to ensure that all comments have been captured and that messages are well understood

General Comments

- GLBTS process should rely on / align with existing national programs but not be limited by them
 - Recognize limitations
 - Avoid redundancy / duplication of effort
 - Consideration of workload issues
- GLBTS does not have the capacity to undertake a program similar to those being pursued at the national level, but information resulting from national programs could be absorbed and applied to the Great Lakes basin
- Further work should focus on risk based ecosystem and human health based priorities identified for the region and ensure that any measures pursued will result in significant progress in addressing these priorities
- GLBTS should increase emphasis on precautionary methodology - weight of the evidence and hazard potential rather than solely on the basis of a quantitative risk model
- Further work should only be undertaken under the GLBTS if that work capitalizes on the unique characteristics of the program: consensus on the issue(s) to be addressed; targets and timelines to be met with voluntary measures

General Comments

- Analytical methods are crucial to identifying substances of concern to the Great Lakes basin
- Need to create linkages with other programs (i.e., state/provincial, binational, international, etc.)
- Process should move forward quickly and adhere to original timeline
- Scope should include effective public engagement and public reporting mechanism in the programs
- Adequate time needs to be allocated for discussion on significant issues and process
- Program objectives need to be reviewed, modified, and appropriately re-established as part of any effort to address new substances

Substance Workgroup

- Importance of developing a mechanism for the identification of substances of concern
 - Define criteria
 - Focus on inclusiveness rather than exclusion
- GLBTS should use results of national programs, but not be limited by them, as other properties should be considered
- No need to conduct parallel or separate substance assessment operations within the Great Lakes basin
- Consideration should be given to substances that might not be captured by national programs (i.e., by-products)
- Substances not be identified for action based only on high volume data
- Further work related to chemicals should be based on a thorough analysis of whether levels of the substance are present in the Great Lakes at levels likely to present consequential risk to human health or the environment
- Include a process for identifying chemicals through environmental monitoring programs

Substance Workgroup

- Consideration should be given to “bioaccumulative” substances
- Consideration should be given to the additive effects of multiple chemicals
- Chemicals should be considered in the context of all other existing environmental stressors
- Relating exposure to health outcomes may influence the prioritization of substances
- Should include a parallel process for the identification and promotion of safer alternatives where the societal value of a particular use has been demonstrated
- Identify priority chemicals for R&D where no alternatives or substitutes currently exist

Sector Workgroup

- Substances need to be identified before deciding whether a sectoral strategy will work and how substances should be addressed
- Linkages need to be made between national programs and sectoral initiatives in the Great Lakes basin
 - Avoid duplication of effort / redundancy
 - Coordinated timing, where appropriate
- Sector-based approach may generate challenges related to confidential business information/trade secrets
- Consideration should be given to how efficiency of operations and competitiveness will factor into a sectoral approach
- Clear guidelines and rules of engagement need to be established to assist in determining how the process will be advantageous over other implementation means
- Consideration should be given to the development of sector-specific schedules for targeted substances
- Consideration should be given to substitution where alternatives already exist

Management Opportunities

- Scope should include the development and implementation of action plans outlining explicit deadlines
- Need for early action on problematic substances, even where complete information is not available
- Need to recognize the value of regional efforts and consider innovative options and substances that are not captured in federal programs
- Consideration should be given to the role green chemistry within the GLBTS forum
- Development and promotion of suitable alternatives should be considered in the development of a management regime
- Should provide sufficient technical and financial assistance to support effective implementation of action plans
- Reliance on pro-active and aggressive prevention: front-of-pipe over end-of-pipe strategies