Appendix B

Stakeholder Comments

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Stakeholder Comments

Background

Individuals who played a significant role in the development and implementation of the pilot printing Environmental Results Program, including internal and external stakeholders, and select small printers that voluntarily participated in the pilot, were invited to review a draft of this final evaluation report and provide comments. General responses and responses to specific questions were requested. The following message was sent soliciting comments on the draft report:

> ***Dear Printer ERP Participants and Stakeholders,***
>
> ***We have attached for your review, the draft "Printing Sector Environmental Results Program Evaluation," May 2009, which is the State Innovation Grant Technical Project Report (Cooperative Agreement No. PI 965809-01) prepared by the Department of Natural Resources, in collaboration with the Department of Commerce. The report is a summary of the pilot project for small printers which began in June 2005 with an innovation grant from the U.S. Environmental Protection Agency (EPA). The primary project goal was to improve compliance with air, waste and water regulations through an Environmental Results Program (ERP) for small printing facilities.***
>
> ***We welcome your comments on any aspect of this draft report, but ask that you provide us with feedback on the following:***

In general, the draft report was viewed favorably with respect to clarity and the logic of conclusions provided. The pilot printer ERP was felt to have value and this perspective was offered by small printers that participated in the pilot as well as by WDNR inspectors. A significant outstanding issue that needs to be clarified is the future of the pilot printer ERP. Will it still be supported by WDNR and if so what efforts should be undertaken to respond to report findings and stakeholder concerns.

Responses

The following are select responses to the four questions for which feedback on the report draft were requested:

1) <u>Does the project explanation and evaluation of results make sense? Are the report findings clear and easy to understand?</u>

"I found the project explanation and evaluation clearly written and the results reflect what we discovered as well that small printers need upfront training and audit type experience to better reflect their operations with a certification type program. The EBPIs chosen were very good criteria for regulatory compliance and the four that showed statistically significant improvements are a measure of the import of the quality of the program in itself."

"It was good to see the high marks and/or improvements in things like closing containers, covering mixing and storage tanks, and meeting local POTW requirements; these are issues we commonly identify in HW inspections. I did notice that for some areas that had improved, overall performance was still low. I didn't see whether this was pointed out; if not, this could confuse the reader to see the same issues in both the list of statistically significant increases, and low compliance."

"The report provides excellent and detailed information regarding the pilot program. Based on our review of the program description and data provided, we found it presented in a clear and rationale manner."

"From a small business owner / operator perspective, the volume of information is daunting and the repetition can be distracting. Acknowledging the scientifically oriented reporting format, a more concise, bullet-pointed presentation may have a greater probability of being read and utilized by a larger audience."

2) Based on your area of expertise or knowledge of the printing industry, do the report conclusions seem logical? Do the conclusions naturally follow the explanation of the data evaluated?

"Yes, again our results indicated that the post certification responses show better compliance rates and this is a reflection of the workbook and self audit evaluation that the facilities perform. A mandatory program vs. voluntary requires considerable incentives in order to get the higher involvement rates and certainly better performance by the facilities."

"Based on a review of both the report and Summary of Findings, we do believe that the conclusions logically flow from the data presented and evaluated in the body of the report. We specifically agree that the incentives provided for participation in the program were not sufficient to motivate printing facilities to participate. The main incentive, from both a trade association as well as industry point of view, would be regulatory reform."

"Yes, the report conclusions present as logical and the conclusions follow the explanation of the data evaluated. Any reservations I have result from a potential question as to the validity of the data and conclusions derived from them as a result of the relatively small sample size and the participant profile so heavily skewed toward printers with less that 10 employees emitting very small amounts of pollutants."

3) What do you think the primary values of the ERP pilot project are?

"To measure the overall performance of the sector for multi media requirements. Also to determine if a mandatory vs. higher incentive based voluntary program would be useful to increase compliance rates."

"Both SGIA and Printing Industries of America representatives were accepted as major stakeholders in this process. We see this as a positive step, and one that helped the WDNR develop a stronger understanding of the printing industry and the obstacles faced within the WDNR regulatory system."

"Secondly, the development of the ERP workbook underscored the need for communication between media programs to develop a workbook that was sector specific. It also resulted in the development of other printing related outreach tools. We believe this program highlighted, for the Agency, both the need and effectiveness of sector specific outreach tools for educating facilities regarding their environmental compliance obligations."

"This project also highlighted the need to provide compliance information in relatively easy to understand formats. The report does indicate that the Agency needs to provide the information in even more simplistic terms. This project provided the Agency with the much needed input from a small business sector as to appropriate outreach tools."

"From our perspective, this program also highlighted the need for regulatory reform, especially for air pollution control standards. These rules are very confusing for small printers and often misunderstood. The ERP program can be used to become compliant without spending resources to hire a consultant."

"1. The project provides a snapshot of the 'environmental intelligence' of the participants as a segment of the entire universe of Wisconsin commercial printers. 2. The project reveals interesting demographic profile data of participants: 72.5% have less then 25 employees and emit / generate very small amounts of pollutants; collectively the participants represent a significant opportunity for improvement in environmental performance. 3. The project revealed where the participants will benefit most and most readily from continued support and engagement, especially with SBAAP staff and resources to assist them. 4. The recommendations are especially good; implement them!"

4) What are the next steps now that the project is complete? What process should we follow to implement the report's recommendations and findings?

"Explore where performance is low and determine if you can target these deficiencies with workshops and a voluntary based ERP program or develop the ERP into a mandatory program if sufficient inspection resources are available."

"We agree the project should continue and expand."

"As to the process to implement: Not sure, but I feel much better knowing small flexo printers are working on the same EBPI's and would suggest that like-printers somehow be grouped together in the future."

"The study provides a solid procedural foundation to undertake additional studies in the printing industry and other industries as well. You've done very good work here; leverage the learning."

"You might consider distilling the information in the report to a one or 2-page document (tri-fold?) and reconnect with your industry partners, either collectively or individually to share the knowledge gained (a collective discussion might prove interesting...). You might also consider sharing the distilled version of your learning with all of the predicating companies, inviting their comments."

"One practical question, related to the recommendation to continue providing the printing ERP as an annual certification option: what are your expectations with respect to the various media inspection programs? That is, are you suggesting the annual certifications replace or otherwise remove these facilities from the universe of those we may potentially inspect? I know we talked about this in the context of this project, but I think that was with the understanding that it would last a year, and I'm fairly certain we agreed that the facilities would be informed that their participation would not preclude them from being inspected."

"Before moving forward with any of these recommendations, the Agency needs to provide a clear statement of intent. Is it the intent to use this program as a voluntary initiative? Is it the intent to use this program only as it impacts air permitting and other regulatory requirements? While the findings and recommendations do flow from the report, we do find that a clear statement of intent, including a possible timetable, as to direct next steps is missing."

"The study provides a solid procedural foundation to undertake additional studies in the printing industry and other industries as well. You've done very good work here; leverage the learning."

"You might consider distilling the information in the report to a one or 2-page document (tri-fold?) and reconnect with your industry partners, either collectively or individually to share the knowledge gained (a collective discussion might prove interesting...). You might also consider sharing the distilled version of your learning with all of the predicating companies, inviting their comments."

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