



INFORMATIONAL BRIEF

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EHS Committee Quarterly Meeting Held at Sun Chemical Corporation

August 15, 2011 - FPA's **Environmental, Health and Safety (EHS) Committee** held its quarterly meeting on July 20-21, 2011. Following below are highlights of the meeting.

- Committee members discussed the viability and need to develop a **functional unit to express greenhouse gas emissions on the industry level**. This was a major point of discussion since CPGs, retailers, and investors are requesting facility and/or packaging's GHG emission information. The committee was unable to reach a consensus as reporting methods currently vary from company to company. It is suggested that member companies have internal discussions to determine if there can be a functional unit that may be used to track industry performance on a year to year basis. This will help decide FPA's role and next steps.
- Due to the recent and pending retirements of several U.S. EPA staff members, the Committee agreed that FPA should work on **developing new U.S. EPA contacts** to continue interaction and dialog when matters of industry concern surface. Working proactively with the U.S. EPA has always been a focus of the committee's activities.
- The U.S. EPA has proposed revisions to the **2008 Definition of Solid Waste Final Rule**. The revisions would eliminate from the rule certain exclusions for secondary materials intended for reclamation. FPA supports the on-site reclamation definition but disagrees with the treatment of any excess capacity sent to third party as hazardous waste. Additionally, FPA has issues with the exclusion of "high-value" hazardous secondary materials used for re-manufacturing into similar products. Also, its currently not clear what steps the Agency will take to encourage states to adopt the rule to avoid compliance uncertainties. FPA will submit comments on these and other issues of concern in the proposal. The comments are due September 20, 2011.

Committee had a conference call with Charlotte Mooney of the U.S. EPA regarding the above Proposed Rule. The intent was to share FPA concerns with the proposal and seek clarity.

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