

Hidden Consequences

References

- 1 'Bioaccumulative' means the ability to accumulate in the food chain.
- 2 'Discharge' means all discharges, emissions and losses. In other words, all pathways of releases.
- 3 Based on the basic intrinsic properties of hazardousness – persistence; bioaccumulation; toxicity (including carcinogenicity, mutagenicity and toxicity to reproduction (CMR); endocrine disruption; and equivalent concern.
- 4 PRTs are inventories of pollution from industry and other sources providing government, industry, and the public with information on releases and transfers of hazardous chemicals to air, water and land.
- 5 Evans JE & Hamner WB (2003) suggest the leapfrog approach in 'Cleaner Production at the Asian Development Bank', *Journal of Cleaner Production*, 11:6: 639-649, 2003. This states that the bank 'believes that CP (Cleaner Production) can save the Asian region billions of dollars in environmental infrastructure costs', and that the conventional command and control approach has not significantly succeeded in reducing pollution in most developing countries due to 'lack of political will, financial resources and legal capacity to enforce standards, and the mistaken belief that environmental protection was an obstacle to economic development'.
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30 Only five substances of the 15 substances required by Annex B of the RD 52.24.643-2002 are potentially persistent hazardous chemicals. There is a list of non-mandatory chemicals for monitoring, including some persistent and/or hazardous chemicals, for example mercury, cadmium, lead, arsenic, borium, fluorine, aluminum, formaldehyde, anilin, methylmercaptan, sulphides, chlorinated and fluorinated pesticides. However these non-mandatory chemicals are not monitored regularly (or at least data on these substances are not included in the latest National State of the Environment report of (Report from The Federal Service for Hydrometeorology and Environmental monitoring for the Russian Federation, Review of State of the Environment of the Russian Federation in 2008, Moscow, 2009. UDK 551.550.42) nor exist in other reports to our knowledge).

31 Presentation given by Ms. Irina Alexeeva, Vodokanal St. Petersburg at XI Baltic Sea Day International Environmental Forum, St. Petersburg, 22 – 24 March 2010 as part of the COHIBA PROJECT (see http://www.cohiba-project.net/publications/en_GB/publications/), a meeting with involvement of Russian stakeholders. Describes the methods for identification of sources of hazardous substance in waste streams and discharges. However, this presentation was a one-off exercise. Greenpeace has reason to believe that it came only in response to Greenpeace pressure on the local authorities to provide data.

32 For example, the data in the presentation referred to in the preceding footnote is not available in the public domain. No data from other wastewater treatment plants is available.

33 See Question 4 in separate Q&A document, available at: <http://www.greenpeace.org/q-and-a-for-a-toxic-free-future.pdf>

34 Saint-Petersburg.ru (2010). 'Vodokanal of St. Petersburg does not want to stay alone with polluters', 7 December 2010. At: <http://saint-petersburg.ru/m/241547> [Accessed 27 Jan 2011]. This article quotes the CEO of Vodokanal, Mr. Felix Karmazinov, saying: 'Municipal water treatment facilities can't treat industrial wastewaters, but this is due to the shortcomings in the legal relationship between treating and discharging businesses. But we are powerless to challenge the polluters. We are taking them to the Arbitrary court but they are laughing and saying: "Prove it."' (Greenpeace translation).

35 For example, many major electronics manufacturers have phased out the use of brominated flame retardants and PVC in their products. See <http://www.greenpeace.org/international/en/campaigns/toxics/>

36 Blacksmith Institute (2007). The World's Worst Polluted Places – The Top Ten (of The Dirty Thirty). Blacksmith Institute, New York, September 2007. At: <http://www.blacksmithinstitute.org/wwpp2007/finalReport2007.pdf> [accessed 31 January 2011]. Note: The Blacksmith Institute establishes the list of pollution hot spots by accepting nominations from around the world and assessing the severity of their impacts on health with the support of a Technical Advisory Board (TAB). The hot spots are scored using a set of criteria that includes types of pollutants found, pathways and potential exposure of people, but it recognises that the classification of the sites still remain heavily dependent on the experience and professional judgement of TAB members.

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38 The EMB limit for surface water for 'Class C' (fisheries, boating and industrial purposes) was exceeded in one or more sampling stations for eight heavy metals - arsenic, cadmium, chromium, copper, lead, mercury, manganese and nickel.

39 Department of Environment and Natural Resources-Environmental Management Bureau.

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41 Though not specified, it is assumed that the US Washington State standard was used in the Asian Development Bank Report, in the absence of an applicable Philippines standard for contaminants in sediment. It should be recognised that the US Washington State standard is not legally applicable in the Philippines.

42 The Asian Development Bank Report from May 2009 does not clarify the natural background levels for this river basin, which may not be known. However, these rivers have had been subject to industrial discharges for more than 100 years. For example, the fireworks industry has been present in the river system since the 1850s (see: <http://environment.peza.gov.ph/getfile.php?fileid=74>) and the jewellery industry that handles heavy metals such as mercury has been present in the river system since the 1930s (see: <http://bulacan.gov.ph/business/jewelry.php>).

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44 As laid down in Department of Environment and Natural Resources Administrative Order No. 7, Series of 2008, dated 14 May 2008. Subject: Designation of the Marilao-Meycauayan-Obando River System Water Quality Management Area and Creation of Its Governing Board.

45 DENR-EMB (2010). Draft Ten-Year WQMA Implementation Plan for Marilao-Meycauayan-Obando River System 2010-2020. A hard copy of this has been shared with Greenpeace Southeast Asia by DENR-EMB Region 3, Q3 2010.

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47 Unitar (2011). Pollutant Release and Transfer Registers. At: <http://www.unitar.org/cwm/prtr> [accessed 17 February 2011]

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- 226** For example, the Convention for the protection of the marine environment of the NE Atlantic (OSPAR) and the EU chemicals management Regulation (REACH).
- 227** It is important to make a distinction between Cleaner Production and Clean Production. Clean production is any practice that eliminates at source the use or formation of hazardous substances through the use of non-hazardous chemicals in production processes, or through product or process redesign, and thereby prevents releases of hazardous substances into the environment by all routes – directly or indirectly. Cleaner production includes conserving raw materials and energy; eliminating toxic raw materials; and reducing the quantity and toxicity of all emissions and wastes before they leave a process (UNEP Cleaner Production Program - <http://www.unido.org/index.php?id=o5152>). In other words, Clean Production requires elimination and Cleaner Production requires only reductions.
- 228** The substitution principle requires finding solutions through non-hazardous alternatives and not simply through transforming one hazard into another hazard, or by substituting a hazard with another slightly less hazardous but still problematic chemical
- 229** REACH is the European Community Regulation on chemicals and their safe use (EC 1907/2006). It deals with the Registration, Evaluation, Authorisation and Restriction of Chemical substances. The law entered into force on 1 June 2007. The aim of REACH is to improve the protection of human health and the environment through the better and earlier identification of the intrinsic properties of chemical substances, and to make the 'burden of proof' (of a chemical's safety) the responsibility of the chemical producer and not the authorities. At the same time, REACH aims to enhance innovation and competitiveness of the EU chemicals industry. See http://ec.europa.eu/environment/chemicals/reach/reach_intro.htm [accessed 18 February 2011]
- 230** For example as mandated by the Massachusetts Toxics Use Reduction Act (MTURA).
- 231** Massachusetts Department of Environmental Protection fact sheet. 2004 Toxics Use Reduction Information. August 2006. At: <http://www.mass.gov/dep/toxics/priorities/04relfs.pdf>
- 232** Note that \$27 m US dollars of this is investment by the companies in voluntarily improving their own operations. These would not even be counted as costs in some analyses, but as benefits. Rick Reibstein, OTA, personal communication.
- 233** Toxics Use Reduction Institute (1997). Evaluating Progress: A Report on the Findings of the Massachusetts Toxics Use Reduction Program Evaluation, March 1997; www.turi.org/content/content/view/full/998. For an academic perspective on TURA, see: O'Rourke L (2004). Mandatory Planning for Environmental Innovation: Evaluating Regulatory Mechanisms for Toxics Use Reduction. *Journal of Environmental Planning and Management*. Vol. 47, No. 2: 181–200.
- 234** Rick Reibstein, OTA, personal communication.
- 235** See, for example, Opportunities for Innovation: Pollution Prevention Edited by David E. Edgerly. National Institute of Standards and Technology Gaithersburg, MD 20899. Prepared for US Department of Commerce National Institute of Standards and Technology Gaithersburg, MD : 20899NIST GCR 93-659, August 1994. <http://www.p2pays.org/ref/02/01123/01123.pdf>
- 236** See, for example, how standing is now being granted in China to environmental protection organisations to sue for environmental damage. Shanxi province has passed a law to encourage public participation in environmental protection. <http://www.greenlaw.org.cn/enblog/?tag=environmental-litigation> [accessed 18 October 2010]
- 237** Conway P et al (2003). The North Carolina Textiles Project: An Initial Report, U. NC at Chapel Hill. At: http://www.unc.edu/~pconway/Textiles/nctp_tatm_rev.pdf
- 238** POTW - Publicly-owned waste water treatment works.
- 239** Moore SB & Ausley LW (2004). Systems thinking and green chemistry in the textile industry: concepts, technologies and benefits, *Journal of Cleaner Production*, 12: 596.
- 240** NC Department of Environmental Management (1982). Incorporating the Pollution Prevention Pays Concept - A Plan of Action. Raleigh, NC.
- 241** NC Division of Pollution Prevention and Environmental Assistance, Environmental Stewardship Initiative Legislative Report, 2008.
- 242** Gary Hunt has served as director of the division for most of that time, and has also advised EPA and the National Pollution Prevention Roundtable on pollution prevention practice and policy.
- 243** Phone interview with Gary Hunt, October 2010.
- 244** For example, 'Case Studies of Strategic Benefits Realized by Selected Participants in the Toxics Use Reduction Program', (Meninger, Wirtanen, Kelly, Diener, UMass Boston, 1995), found that companies examining their toxic materials inputs not only reduced toxics use but also achieved 'enhanced product quality, new product development, reduced and competitive pricing, increased customer responsiveness, reduced time to market, and increased share of market'.
- 245** Personal communication from Richard Reibstein, Massachusetts Office of Technical Assistance.

246 JE Evans and WB Hamner suggest the leapfrog approach in 'Cleaner Production at the Asian Development Bank', *Journal of Cleaner Production*, 11:6: 639-649, 2003, which states that the bank 'believes that CP (Cleaner Production) can save the Asian region billions of dollars in environmental infrastructure costs', and that the conventional command and control approach has not significantly succeeded in reducing pollution in most developing countries due to 'lack of political will, financial resources and legal capacity to enforce standards, and the mistaken belief that environmental protection was an obstacle to economic development'.

247 For examples of initiatives that seek to green whole sector lifecycles such as the NICE fashion Initiative (Nordic Initiative Clean & Ethical Fashion), see <http://www.nicefashion.org/en/about/> and <http://www.nicefashion.org/en/resources/Chemicaltool.html>. For product environmental CV initiatives such as the new open source eco-index launched by some big clothing brands, see http://www.ecotextile.com/index.php?option=com_content&view=article&id=10864:worlds-clothing-brands-to-launch-eco-label-for-consumers&catid=10:fashion-retail&Itemid=32. These are just examples of many such initiatives and do not correspond to a Greenpeace endorsement of these tools and initiatives.

248 Ecolabel Index, which tracks eco-labels, now includes 329 eco-labels in 207 countries. The International Finance Corporation of the World Bank Group now applies environmental sustainability standards 'to all investment projects to minimise their impact on the environment and on affected communities'. See <http://www.ifc.org/ifcext/sustainability.nsf/Content/EnvSocStandards>, and <http://www.sciencedaily.com/releases/2008/01/080121100554.htm>

249 2003 report on Socially Responsible Investing Trends in the United States, Social Investment Forum, October 2003. See www.socialinvest.org/resources/research/documents/2003TrendsReport.pdf [accessed 17 December 2010]

250 2010 European SRI Study, Eurosif, 2010. See <http://www.eurosif.org/research/eurosif-sri-study/2010> [accessed 17 December 2010]

251 Textile Manufacturing Environmental Health and Safety Guidelines (2007). International Finance Cooperation - World Bank Group, April 2007. At: <http://www.ifc.org/ifcext/sustainability.nsf/Content/EHSGuidelines>

252 MTURA has reduced toxic chemical use in the state of Massachusetts by several hundred million pounds (100 million pounds = 45,000 tonnes) and saved companies more than the cost of its requirements. The latest results from the US EPA P2 programme indicate that prevention has been very cost-effective, saving a total of approximately \$6.4 billion US dollars between 2004 and 2006 (see examples of MTURA and the North Carolina Pollution Prevention Pays in boxes 6 and 7.)

253 'Discharge' means all discharges, emissions and losses. In other words, all pathways of releases.

254 Typically, one generation is understood to be 20 to 25 years.

255 For example, 'no data, no market' provisions.

256 Based on the eight basic intrinsic properties of hazardousness – persistence; bioaccumulation; toxicity; carcinogenic, mutagenic and reprotoxic; endocrine disruption; and equivalent concern.

image: A winter swimmer cuts through the waters underneath the bridge spanning the Yangtze River in Wuhan City, China.



GREENPEACE

Greenpeace International
Ottho Heldringstraat 5
1066 AZ Amsterdam
The Netherlands

Greenpeace is an independent global campaigning organisation that acts to change attitudes and behaviour, to protect and conserve the environment and to promote peace.

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