



Robert H. Burnett
Executive Director

April 20, 1992

TO: VI Executive Board

RE: Chlorine Attack

On April 15 the International Joint Commission (IJC) issued a press release demanding the elimination of certain "toxic substances" and specifically named chlorine and chlorine-containing compounds used as industrial feedstocks (i.e. - PVC).

Attached for your review...

- * The IJC press release
- * A Chlorine Institute response to members and press inquiries
- * Several press clippings reporting the story
- * A "standby" statement by the Vinyl Institute

We have one copy of the booklet that accompanied the IJC press release and have requested additional copies for distribution to you on receipt. We are working closely with the CI and appropriate SPI staff to monitor the situation and respond as needed. Please keep us informed if relevant information comes to your attention.

Sincerely yours,

RHB/pmb
attachment
cc: Bob Smerko - CI

CTL007537



International Joint Commission

FOR RELEASE APRIL 15, 1992

Contact:	Washington	Frank Bevacqua	(202) 736-9024
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"Are humans and our environment in danger from persistent toxic substances now? Are future generations in danger? Based on a review of scientific studies and other recent information, we believe the answer to both questions is yes."

Thus concludes the International Joint Commission in its Sixth Biennial Report on Great Lakes Water Quality, released today on the 20th anniversary of the signing of the first Great Lakes Water Quality Agreement by the United States and Canada. This report is issued in accordance with the Commission's responsibility to assess and report on progress in fulfilling the commitments made by the two countries in the Great Lakes Water Quality Agreement of 1978, as amended in 1987.

The Commission also reported that the Agreement goal of virtually eliminating the discharge of persistent toxic substances has not yet been achieved for any persistent toxic substance. Because these substances remain in the environment for long periods of time and become widely dispersed, and because they bioaccumulate in plants and animals, including humans, the Commission concludes that these substances are too dangerous to the biosphere and to humans to permit their release in any quantity.

Several actions are recommended in the Commission's Sixth Biennial Report to begin eliminating and preventing the release of persistent toxic substances.

- applying a weight of evidence approach to the identification and virtual elimination of persistent toxic substances;
- certain chemicals, be subject to "sunsetting", a comprehensive approach to restrict, phase out and eventually ban the manufacture, generation, use, transport, storage, discharge and disposal of a persistent toxic substance;
- production processes and feedstock chemicals be altered to prevent the creation of dioxins, furans and hexachlorobenzene as byproducts of those production processes;

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- the use and disposal practices for lead and mercury be reviewed and their use be sunset wherever possible;
- the Agreement's definition of a persistent toxic substance include all substances that persist in water, air, sediment, soil or biota, as well as those that bioaccumulate in the tissue of living organisms;
- timetables be developed, in cooperation with industry and other affected interests, to sunset the use of chlorine and chlorine-containing compounds as industrial feedstocks. Other uses of chlorine should also be examined to determine where it might be reduced or even eliminated.

The Commission also recommends that a specific date and plan be established to phase out existing point or direct sources of persistent toxic substances to the Lake Superior basin, and prohibit new or increased sources. It urges the Parties to consider supporting a UNESCO Man and the Biosphere Reserve within the Lake Superior drainage basin to focus attention on preserving the high quality waters of this lake.

The report reiterates recommendations from the Commission's recent Special Report on Great Lakes Environmental Education and further recommends that educational programs be developed and implemented that incorporate the Great Lakes ecosystem into curricula at all age and subject levels. To protect and preserve areas of high water quality in the region, the Commission also urges federal, state, provincial and local governments to cooperatively identify and designate areas of high water quality in the region and develop a model program to conserve and protect them within a framework of environmentally sensitive and sustainable economic development.

The Agreement calls upon the Commission to collate, analyze and disseminate information regarding Great Lakes water quality. The Commission is also required to provide a public information service for the programs of the Agreement including public hearings. Appendices I, II, and III of the sixth biennial report describe the most intensive program of public information, participation and educational activities ever undertaken by the Commission.

The International Joint Commission is an independent international organization, with three Commissioners appointed by the President of the United States and three chosen by the Governor-in-Council in Canada, under the provisions of the 1909 Boundary Waters Treaty between the two countries. The Commission's report is a result of information and advice from a variety of sources, including its Great Lakes advisory boards, council and task forces, citizens, industries and environmental organizations.



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Contact: Allison Rajala or Joe Walker, 202/775-2790

April 14, 1992

CHLORINE INSTITUTE RESPONSE TO SIXTH BIENNIAL
IJC REPORT ON GREAT LAKES WATER QUALITY

The Chlorine Institute is pleased that the International Joint Commission in its Sixth Annual Report on Water Quality has invited all parties, including industry, to examine ways to enhance the protection of the Great Lakes ecosystem.

However, the report's conclusion that timetables be set to ban the use of basic chemicals used throughout modern society is not supported by sound science. In fact, the stated underlying premise is that the recommendations be implemented "...whether or not unassailable scientific proof of acute or chronic damage is universally accepted" (p. 5). The report also does not consider the total societal loss of such extreme action.

In the case of chlorine, the recommended ban would eliminate access to a product essential to modern life and public health. Thanks to the chlorination of water supplies, the United States and Canada virtually have eliminated the threat of waterborne diseases, including cholera, typhoid and dysentery. Chlorine has other important public health applications, too. For example, chlorine compounds are widely used in the manufacture of pharmaceuticals that treat diseases such as malaria, leukemia and Hodgkin's disease.

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CHLORINE INSTITUTE RESPONSE TO IJC REPORT, p. 2 of 2

Beyond the public health benefits, chlorine is vital to a multitude of products in our everyday lives. Chlorine is integral to the manufacture of plastics, including vinyl; automobiles, including brake fluids; electrical cable; food preparation; and a host of other goods. Chlorine is interwoven into the fabric of society.

Chlorine's role in society is defended by sound science, science that stands the test of peer review and intense examination in our governmental processes. Where proven risks outweigh the benefits, the industry works with its customers and the government to find solutions to minimize or eliminate these risks so that chlorine and chlorine compounds will continue to meet essential societal needs.

The chlor-alkali industry strongly believes that cooperative, science-based dialogue is the best way to resolve questions regarding chlorine, and we will continue to support and participate in scientifically credible examinations of the risks and benefits of chlorine and chlorine-containing compounds.

The Chlorine Institute is the non-profit safety, health and environmental protection center of the chlorine industry. The Institute represents companies that are working to ensure the safety of people and the environment during the production, distribution and use of chlorine, chlorinated solvents and related products.

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Post-It brand fax transmittal memo 7671		# of pages 7
To: Allison Rajala	From: Jay Hutchinson	
Co.	Co.	
Dept.	Phone #	
Fax #	Fax #	

April 14, 1992 (REVISED 2:50 p.m. 4/14/92)

DRAFT response to questions concerning the International Joint Commission's recommendations regarding chlorine and chlorine compounds:

1 Dow strongly supports the Commission's recommendation that all parties, including industry, join together in a process to review the uses and applications of chlorine and chlorine-containing compounds. We welcome that role and have offered our services to the IJC, along with the Chlorine Institute of which we're a member.

2. The important issue here is that the benefits of chlorine and its derivatives have to be weighed scientifically against possible risks and then people must know what those risks are. For instance, last year the International Agency for Research on Cancer (IARC) reviewed data and found chlorinated drinking water to be non-classifiable as to its carcinogenicity to humans.

We do agree there are some uses of chlorine which should be phased out, particularly those that are alleged to contribute to the depletion of the ozone layer. Just last week Dow announced an accelerated global phaseout of methyl chloroform--a much broader phaseout than the one called for by President Bush earlier this year.

2. We are therefore concerned about IJC's recommendation that parties get together to sunset the use of chlorine and chlorine compounds. We believe that the concept of eliminating all uses of chlorine and chlorine-containing products will detract from the tremendous societal benefits that the products offer.

3. We believe that all parties should start working on a process to determine the appropriate applications of chlorine and chlorine derivatives and that decisions should be made on a case by case basis using sound science. We have to keep in mind that hundreds of applications of these products provide significant societal value and can be used within acceptable risk parameters.

4. We also are not certain about the extent of applications the IJC covers when it refers to the use of chlorine and derivatives as feedstocks. Once we understand the parameters of that description, we'll also be able to comment more fully on the impact this recommendation would have on industry and society.

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5. We have not seen IJC's complete report and therefore cannot comment in any greater detail.

Other points that can be issued in response to questions:

--Talk about chlorine applications:

Water disinfection

Medical (blood transfusion/IV bags and tubing, disinfection, pharmaceuticals)

Housing (PVC pipe, paint, appliance housings/coatings, vinyl house siding)

Automotive (plastic car cushions/dashboards, hoses under hood, tires, transmission fluids, gasoline)

Plastics (electrical wire casings, sports equipment, prescription plastic lenses, garden hoses)

Others (vinyl rain gear, paper bleaching and strengthening, textile manufacturing, swimming pools, bleach, detergents, cleansers, compact discs)

--Global task force at Dow and its findings (material in Dow Today)

--Methyl chloroform re-emissive applications and Dow's announcement regarding global phaseout

--Location of Dow manufacturing facilities: Freeport/Baton Rouge/ Fort Saskatchewan/Stade

--One half of the sales and one-half of the employee base of The Dow Chemical Company are impacted by chlorine chemistry

--We produce 16 billion pounds of chlorine and caustic yearly in North America (10% of that is sold into the merchant market -- multiple applications -- and 90% is used internally to produce other chlorine derivatives and related products)

--Chemical and Engineering News (magazine) calls chlorine the "single material on which production of other chemicals most depends."

Report: Chlorine should be phased out

By DOUG HENZE
Daily News staff writer
and The Associated Press

WASHINGTON — Chlorine, used to bleach paper and produce hundreds of other items, should be phased out in manufacturing because of potentially toxic combinations with other substances, a U.S.-Canadian joint commission report says.

The Dow Chemical Co. is the world's largest maker of the product. Until recently it was produced in Sarnia, Ontario, and still is made by Dow in Texas, Louisiana and Saskatchewan.

"We know that when chlorine is used as a feedstock in a manufacturing process, one cannot necessarily predict or control which chlorinated organics will result, and in what quantity," said the sixth biennial report on Great Lakes water quality issued by the International Joint Commission. The report was released Monday.

The report by the independent panel of U.S. and Canadian representatives said trying to regulate toxic substance discharges into the five lakes and the St. Lawrence River hasn't been successful enough. The group was set up by the countries' governments when the 1978 Water Quality Agreement regarding the Great Lakes was signed.

"They gave us the assignment of monitoring how well they are doing," said David LaRoche, secretary of the commission's U.S. section.

The report indicates the countries are not doing well enough.

"Since it seems impossible to eliminate discharges of these chemicals through other means, a policy of banning or sunsetting their manufacture, distribution, storage, use and disposal appears

(See "Chlorine," page A2)

Midland Daily News, Midland, Michigan

Tuesday, April 14, 1992

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Chlorine ...

(Continued from page A1)

to be the only alternative," it said of toxic substances in general.

"It is not possible to remove a persistent toxic substance from a source completely once that substance has been produced. Nor is it possible to retrieve that substance completely once it has entered the environment.

"Therefore, the focus must be on preventing the generation of persistent toxic substances in the first place, rather than trying to control their use, release and disposal after they are produced."

LaRoche said the panel also wants alternatives to chlorine's more well-known uses in water, sewage treatment and pharmaceuticals to be researched.

"As long as they continue to be produced, they're going to find their ways into the lakes," LaRoche said.

has its merits.

"I think we would be concerned that process would detract from the tremendous societal benefits chlorine and chlorine compounds offer," said Joy Hutchison, Dow's senior communications manager for chemical and metals.

She noted chlorine's wide array of uses in disinfectants, blood transfusion bags, electrical wiring insulation, car dashboards and seat cushions, as well as to produce certain medications.

"Among the scientific community, chlorine is often referred to as a building block," said Allison Rajala, a spokeswoman for the Chlorine Institute in Washington.

Hutchison said Dow acknowledges that some uses may be inappropriate, such as in aerosol products. The company plans to phase out that use worldwide, she

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Dow disputes commission's call for ban on chlorine

BY DAVID POULSON
News Lansing Bureau
and News Staff Writers

LANSING — Citing mounting evidence that certain Great Lakes contaminants are harmful to humans, a U.S.-Canadian board is calling for a ban on seven chemicals.

Chlorine is among the substances the International Joint Commission listed Monday, but industry officials say complete elimination of the chemical is unnecessary and potentially disastrous.

Officials at Dow Chemical Co., the world's largest chlorine manufacturer, said chlorine has a wide variety of "critical uses," including water purification, medical disinfection and plastics production.

Environmentalists contend the commission's proposal indicates the gravity of the

contamination problem.

"I take it as the clearest indication that this is not a potential threat or suspected threat or something we have to concern ourselves with in the future, but that it's going on right now," said Jack Weinberg of the environmental group Greenpeace.

The news wasn't all bad.

The commissioners — three from the United States, three from Canada — designated Michigan's Grand Traverse Bay region as a model for environmentally sensitive development.

This was the first time the commission, which met last fall near Traverse City, has noted an area for high water quality.

Amy Schultz, an environmental planner at the Northwest Michigan Council of Governments, said the designation as a pollution-prevention site would serve as a

"positive influence" in maintaining one of the state's premiere vacation spots.

The commission is an independent organization established in 1909 to give advice to the United States and Canada on Great Lakes issues.

This is its sixth report on water quality. Greenpeace, which has an active anti-chlorine campaign, commended the commission for "taking a brave lead."

"We are concerned that the process taken literally will detract from the tremendous societal benefit that chlorine delivers," said Dennis Heydanek, director of environmental and issues management for Dow.

Nearly 80 percent of municipal wastewater treatment plants use chlorine in their disinfection processes, said Joy B. Hutchison, senior communications manager for Dow.

chemicals and metals division.

Developing alternatives to chlorine in all of its uses likely would prove difficult, she said.

Almost half of Dow's annual sales and half of its North American employee base of 38,000 workers is dependent on chlorine production and use of chlorine in other products.

Dow manufactures chlorine in Freeport, Texas, Baton Rouge, La., Port Saskatchewan, Saskatchewan, and Stade, Germany.

The company produces about 16 billion pounds of chlorine and chlorine-related products annually in North America.

It sells only about 10 percent of total, Hutchison said. The rest is used for manufacture of other products.

Earlier this year, Dow announced the phaseout of chlorine production at its facilities

in Sarnia, Ontario.

Other commission recommendations:

- That governments take PCBs, DDT, dieldrin, toxaphene, mirex and hexachlorobenzene out of circulation.

Production of some already is outlawed, but the report calls for a ban on production, use, storage and disposal of all of them.

- That governments not let conflicting perceptions about the threats from toxic chemicals keep them from taking action.

"The weight of evidence" is that they cause injury, the report said.

- That the governments agree to a date when no new discharges of persistent toxics are allowed in Lake Superior, and a date for elimination of all discharges.

Michigan is among the governments that agreed at the commission meeting last fall to give Lake Superior extra protection.

U.S., Canadian Panel Says Toxic Discharge Is Hurting Great Lakes

By a WALL STREET JOURNAL Staff Reporter

WASHINGTON — A joint commission of the U.S. and Canada said in a report that the two nations have failed to meet their goal of eliminating the discharge of toxic substances into the Great Lakes.

In its sixth biennial report, the International Joint Commission recommended, among other things, that industries change their production processes to eliminate the production and discharge of toxic byproducts, and examine the use of chlorine and chlorine-containing compounds. ←

The commission, created under a 1909 treaty between the two nations, is charged with monitoring the progress of cleaning up the Great Lakes under an agreement signed by the two nations in 1978. The commission makes recommendations to both governments.

In its latest report, it specifically urged that industries and the two governments develop plans to phase out existing sources of toxic waste discharges into Lake Superior, one of the five Great Lakes.

Wall Street Journal
4/16/92

CTL007546



A Division of The Society of The Plastics Industry, Inc.

**VI STANDBY STATEMENT:
SIXTH BIENNIAL REPORT ON GREAT LAKES WATER QUALITY
ISSUED BY THE INTERNATIONAL JOINT COMMISSION**

We have not yet had the opportunity to review the scientific data on which the report's conclusions are based. Nor were we a party to the process used to develop it. Therefore, we are unable to comment at length about the validity of the report.

However, our immediate response is that the Joint Commission's recommendations - specifically those related to the use of chlorine and chlorine-containing compounds as industrial feedstocks - follow a leap in logic that we believe is unjustified, especially as they relate to the production of polyvinyl chloride plastics (vinyl, or PVC).

That is, the report appears to conclude that all chlorine-based substances have the same impact on the environment. Scientists who are familiar with the hundreds of compounds that exist within the chlorine family know that each is different and distinct from the rest and their impact on the environment can range from questionable (in the case of PCBs) to benign (in the case of vinyl plastics).

We believe this report raises unjustifiable concerns about the environmental impact of vinyl plastics, which have been produced and used safely for over 50 years. Furthermore, we believe that the recommendation to ban an entire class of chemicals without regard to individual differences within that class applies a broad-brush approach to environmental regulation that could deprive society of highly beneficial products.

Contact: Robert H. Burnett
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April 1992

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