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Subject: Tox-Sciences

Susan:

Some additional and somewhat organized thoughts about a path forward to help facilitate prioritization of Toxicology for growth.

Note that this is a bit cryptic and I would be glad to expand if necessary.

Current projects (examples to facilitate group discussion):

- 1) Support MSDS chapters 3 and 11, including documentation
- 2) Commitments: US: HPV, VCCEP EU: ICCA HPV, Health of Products EU
- 3) Regulatory outlook: US: HPV follow-up (if necessary), Clean Air Act residual risk, endocrine, children's health EU: White Paper/REACH, endocrine, and children's health
- 4) Product stewardship: New product and occasional existing product testing, including benzene Shanghai and EU benzene epidemiology evaluation, EU detergents initiative - HERA - to collect and communicate risk perspective.
- 5) Management of emerging issues (note that our current approach is not to act on all issues but to provide enough effort to provide confidence that these can be dealt with on an as needed basis).
- 6) Support to industry: Regulatory, LRI

Opportunities for growth (examples to facilitate group discussion):

- 1) Promotion and expansion of SD for chemicals

Note particularly that one exciting avenue might be to follow/build on SD goals and I have extracted them from the Shell Chemicals web site below:

Five year SD goals

Shell Chemicals have set a series of performance goals, with the aim of driving a continual improvement in SD performance over the five year period to 2007. The targets are:

- * Energy efficiency: by 2007, improve overall energy efficiency by 7.5%, relative to 2002.
- * Environmental impact: by 2007, reduce critical air emissions per unit of production by an average of 25% relative to 2002 and spills by 50%, relative to the previous five year average.
- * Health of products: by 2004 ensure that a basic set of hazard data is compiled for all Shell Chemicals high production volume chemicals, as an interim step to completing initial risk assessments by 2007.
- * Social performance: over the 2002 to 2007 period, achieve more favourable results in local community surveys for all major manufacturing sites.
- * Business process alignment: by 2007, increase the alignment of business processes with SD by 40%, relative to 2002.

- 2) Communication of existing work: to PBU, locations/employees, customers, public (particularly important in US for emerging air issues)

- 3) Issue management engagement and planning (examples: anticipated acceleration of endocrine and US Clean Air Act issues)
- 4) Reputation: within industry via trade associations, outside industry via regulatory advisory opportunities (ACGIH TLV committee and EPA SAB), Shell only interactions with regulators, community via greater EA strategic planning.
- 5) Support and expand Group interests (eg., animal use, global benzene, butadiene in auto exhaust)
- 6) Interface with locations via OE (occupational exposure limits, location promotion, local issue management)

Prioritization:

- 1) Goal: prioritize work/projects in context of greater CF plan (include dialogue with EA, OE, and other partners). Develop Shell niche, including regional variation. Consider SD as a niche.
- 2) Reality check of existing work: Understand limitations in context of current commitments, but longer range plan should include future commitments based on a pre-determined model. Include timing projections. Acknowledge projects that have to be done (cost of doing business). Seek high impact opportunities and seek leveraging. For example, LRI or other industry committee work can be limited or minimized by taking advantage of trade association staff communication products.. Additionally, some projects can be leveraged internally with Product stewards (that is, tox or product stewards can singly participate in industry committee work).

First steps:

Convene global net meeting or series of net meetings to discuss and expand above elements.
Required: management engagement for meaningful progress

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