

The Society of the
Plastics Industry, Inc.



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POLICY STATEMENT ON GOVERNMENT CONTACTS ON BEHALF OF SPI

Until recently it was possible and even desirable for each of SPI's many operating units to handle its own Government contacts quite independently. Today, in view of the high profile and diversified nature of the plastics industry, as well as the very high stakes involved in several issues, we must make certain that every contact is effectively managed and coordinated.

On the one hand, we want good relations with all regulatory officials; we need their respect and their belief in our credibility and our willingness to cooperate. On the other hand, in the real world in which we must operate, we have to recognize that industry in general does not automatically have high credibility and that the plastics industry may have less than the average. Further, there is today no such thing as an informal, off-the-record, preliminary or unofficial contact with any Government regulatory agency - local, state, or federal. This leads to the following policies:

1. Naturally, any representative of any member company is entirely free at any time to make any Government contacts authorized by his own management, on behalf of his own company. However, in such instances, he will be well advised to consider the importance whenever appropriate, of coordinating with any industry programs under development, if only to make his own efforts as productive as possible.
2. Whenever any SPI operating unit is planning any kind of contact with any Government agency, the purpose and plan for this activity must be reviewed in detail by the staff director with either the President, General Manager or, in their absence the General Counsel before the first contact is scheduled. Any exceptions must have their written authorization. Once authorized, routine and informational contacts of an on-going nature need not be cleared each time, unless new SPI positions are involved.
3. No member company representative or staff director can take on the role of spokesman, invoking SPI's name or committing SPI, unless and until he has formal written authorization (e.g. minutes or resolution) from the constituency involved. He also must comply with number 2 above. Even with such authorizations, he should clearly identify himself with the particular SPI operating unit or constituency he represents, rather than SPI as a whole. Only the Chairman, President or their designated representatives can be authorized to speak for all of SPI, and they are subject to policy guidance by the Board of Directors.
4. Whenever possible, all regulatory contacts should be made jointly by both a member company representative and a staff director or legal counsel. Exceptions will have to be authorized in accordance with number 2 above. In any case, all such meeting contacts should be attended by at least two SPI representatives.

5. Every regulatory contact should be reported by brief memo to the constituent operating unit, to other interested parties in SPI, as well as to the President, General Manager and General Counsel. The only exceptions will be those contacts authorized under number 2 above as routine or informational.
6. Whenever a representative of a regulatory agency initiates a contact with anyone in SPI, and whether or not that contact appears to be formal or informal, all of the foregoing policies apply. No one is a spokesman until authorized and brief reports will be required.
7. Similarly, any letter on SPI letterhead addressed to a regulatory agency, which even remotely touches on policy matters, must have the kind of clearance set forth in number 2 above.
8. A master file of regulatory contacts will be maintained in the President's office and will be accessible at all times for review by members and staff directors.

Now, these policies are not intended to be restrictive; instead their purpose is to help establish better-informed and more effective Government relations. We need at all times to be able to demonstrate that we speak for a responsible consensus. We must avoid intra-industry conflicting positions, whenever possible. We all need to benefit from our collective and cumulative experience in these matters. When we commit, or even imply commitment, we must be sure we can deliver. We have to demonstrate that we are working for the public interest. Through these policies, applied positively, we should earn the kind of trust, cooperation and response we need.

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