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Environmentalists and industry groups are at odds over the adequacy of a landmark proposal for a national green chemistry standard, with some environmentalists calling for the "green" moniker to be dropped because the draft standard does not allow consumers to assess the relative toxicity and energy efficiency of various chemicals.

But industry groups are pushing for the standard to be implemented and resisting environmentalists' calls to create a weighting system to assess the relative benefits of various chemicals, saying it was never intended to regulate chemicals' toxicity and will limit manufacturers' flexibility to adjust the standard to their own needs.

The draft standard was never intended as a "substitute for Toxic Substances Control Act reform," one industry source says.

NSF International, together with EPA, the Green Chemistry Institute, the American Chemistry Council, and others last month unveiled a draft reporting standard, "Greener Chemicals and Processes Information Standard," which details data reporting requirements for chemical manufacturers to help customers identify products with "green" attributes, including less-toxic chemicals and more energy-efficient production processes (Risk Policy Report, Oct. 26).

Supporters say one of the goals of the draft standard is to reduce "greenwashing," or unsubstantiated environmental claims, in the marketplace and remove ambiguity.

But developers of the document have already appeared to soften their original goals, dropping their earlier effort to name the standard as the "Green Chemistry Standard."

One key source suggests the new document could be renamed the "Hazard Information Standard." Other critics say it should simply be renamed as the "Chemicals Information Standard."

The first source says that while the draft serves as a "good starting point" to begin getting information about chemical hazards, many downstream industry users want access to information about a chemical's various transformations during its lifecycle, highlighting a significant weakness of the draft document.

"It won't tell you where the raw materials came from, and it won't be able to tell you 'A is better than B,'" the source says. Another source said the standard was a "fantastic tool" for getting information in one place, but added that the document had limitations. "It's important to realize I can take the most toxic, hazardous, energy-using product in the world and [attain] the standard."

A third source that participated in crafting the draft standard said that the lack of a weighting system for comparing chemical characteristics to one another was likely due to heavy pressure from the chemicals industry during the creation of the document. Public health and environmentalist groups were "not given enough of an input," nor were downstream users who would have to rely on the standard to make business choices, the source says. "I've heard some fairly negative feedback."

The standard, which is voluntary, uses a three-tier system to classify health-related characteristics of chemicals for setting data-reporting requirements, which determine how much information a chemical manufacturer must submit about a chemical to achieve compliance with the standard. Among other things, the draft establishes a list of human health endpoints that the company must submit available studies on, such as a chemical's carcinogenicity or neurotoxicity.

But in comments filed ahead of the Nov. 16 comment deadline, two environmental groups -- **Citizens Environmental Coalition** and Glynn Environmental Coalition -- are calling for the adoption of a "weighting system" to help end users determine what characteristics would make a chemical less hazardous or more energy-saving than another.

Without such a comparative system, the draft's shortcomings "severely limits" the goal of the standard and shift the burden of assessing product's safety onto end users, according to the environmentalists' comments.

"The standard is not constructed to give any guidance as to what actually constitutes 'greener' chemicals and/or chemical processes. In spite of the title of the standard, it provides information without any usable metric to assess how 'green' a chemical or process is, and, indeed, is not able to clearly define what makes a chemical 'greener.' The burden for assessing 'greener' is shifted entirely onto the user, even if the manufacturer does third party certification," the comments say. The comments are available at InsideEPA.com.

The draft also fails to provide "adequate opportunity" for a manufacturer attaining the standard to "describe how it stands out from the pack in advancing green chemistry principles, in substituting safer chemicals for more toxic ones, and going beyond regulatory compliance to voluntarily undertake pollution prevention projects," according to separate Nov. 16 comments filed by the **Citizens Environmental Coalition**.

In those comments, the environmental group lauded the objective of the standard--to offer a uniform way to define and report certain categories of information, their respective data elements and data quality criteria.

But the environmentalist group claims in its public comments that the

standard fails to set any kind of measurable "goal" for safer, less toxic, or less hazardous chemicals or chemical processes.

Instead, the document gives notable attention to energy use and efficiency in the manufacturing process, the comments say. "We expected to read a standard that was primarily about manufacturers moving to safer chemicals and processes, reducing toxicity and process safety hazards, reducing or eliminating the discharge to the environment of chemical by-products or wastes. Instead we see a standard which calls for improved reporting and disclosure on chemical hazards about a manufacturer's existing chemicals and processes, while asking for a lot of information about energy and water use."

The environmental group also says that the "most serious failing of the standard" is that the draft would allow "a highly toxic and persistent, bioaccumulative chemical to be called 'greener' and the process which made it to be called a "greener chemical process."

The environmental groups also noted in their Nov. 16 public comments that there was an "absence of public health professionals and environmental NGO's whose focus is on toxic chemicals policy. More importantly, the standard included few, if any, experts in green chemistry, green engineering, and other critical fields relevant to the standard."

But the American Chemistry Council (ACC) in Nov. 16 comments says the standard has the potential to fill a need in the marketplace for a systematic analysis using green chemistry principles. ACC also says in its comments that the standard can be revised periodically once it is finalized, but that it should be flexible to allow manufacturers to adjust the approach to fit their business needs. "We believe that including an inflexible, overly stringent set of reporting elements at the outset is a significant barrier to adoption and use," the comments say.

And the Society of Chemical Manufacturers and Alliances says in Nov. 15 comments that the information requirements outlined in the draft standard are "extensive" and could create challenges for smaller manufacturers. "To help alleviate this and to encourage use of the standard we ask that the drafting committee consider how it might ease its usage as it continues to develop," the comments say. -- Bridget DiCosmo