

EPA – State P2 Dialogue Spring 2011

Wednesday, March 30

Attendees: States: Robert Jackson, MI DELEG; Hugh O’Neill, WA Ecology; Terri Goldberg, NEWMOA; Gary Hunt, NC DENR; Lissa McCracken, KPPC; Rick Bossingham, IN DEM; Kirk Mills, CO DPHE; Trina Gonzalez, CA DTSC; Rick Yoder, P2Ric; EPA: Tanya Mottley; Julie Shannon; Pam Buster; Barbara Cunningham; Pam Swingle; Tom Tillman; Beth Anderson; Natalie Hummel; NPPR: Jeff Burke, Angela Miller

Session 1 – P2 and Sustainability Strategy

Presenter: Tanya Mottley

- Discussed “all hands” Memo that EPA Administrator Lisa Jackson circulated on September 20, 2010 for Pollution Prevention week. – See Attachment A
 - Memo directed the “Office of Chemical Safety and Pollution Prevention to lead the coordination of pollution prevention efforts at EPA and work with all offices to develop recommendations for how we can more fully integrate P2 in our programs, enhance internal and external collaboration, focus our resources for effectively and use our information tools to better document progress in pollution prevention.”
 - A final draft of recommendations was prepared in time to meet the Administrator’s deadline of March 1, 2011, as stated in the memo.
 - Five recommended themes from cross-agency committee were developed in response to the Administrator’s memo:
 1. Importance of systems approaches for problem solving
 - a. Use P2 tools to accelerate sustainability
 - b. Address regulatory problem solving with non-regulatory solutions
 - c. E.g. DfE, environmental justice
 2. Using information as a driver of sustainability through pollution prevention
 - a. Collection and access of information is a strength of EPA
 - b. E.g. disclosure of ingredients in products, TRI, environmental justice, life cycle assessment
 3. Stretch goals
 - a. Broader P2 goals or national goals
 - b. E.g. Strengthening green purchasingComment: Challenge is funding, showing results from integration and who takes credit for outcomes.
 4. Partnerships
 - a. Engage partners and leverage resources
 - b. Where can there be stronger partnerships?
 - c. E.g. E3 programComment: There needs to be a discussion on funding for implementation. Also, expectations from the program need to be managed.
 5. Strength of “One EPA” approach to sustainability

- a. How to collectively solve environmental problems
- b. Using P2 as an approach to One EPA
- c. Where to look collectively within the EPA

Comments:

- There may be more integration out of necessity; need for capacity building
- Need for common definition of sustainability
- There needs to be a P2 champion at the table
- Culture change needed to accomplish
- E3 discussion – that there needs to be implementation funding or “bridge funding”
- After Tanya hears back from the Administrator on these themes they will then look at next steps.

Other Projects

- Started Sustainable Materials Management last year
 - Suggests a roadmap for the future based on materials management
 - E.g. Packaging, Electronics
- Office of Research and Development has taken the lead on developing sustainability report, “Green Book”, with National Academy of Sciences; the report will address how EPA can incorporate sustainability concepts into its programs. Expected completion date is September 2011.

Session 1 (continued) – Budgets

Presenters: Entire group

Comments:

- Staff reductions due to funding levels
- Pollution prevention grants are critical for some states; they often decide whether or not a state even has a pollution prevention program
- Grant process for pollution prevention grants has become burdened
 - The 50 percent match is difficult or impossible for some programs
 - The amount of effort for the grant does not make the grant amount worth applying – some states may no longer apply for P2 grant funding. There is a concern over the competitiveness of grants.
 - Programs need stability with grant funding
- EPA won't have support for One EPA on the ground if there is no support for core pollution prevention programs – work is to get P2 program considered a “core program”
- Region 7 is having issues with running P2 intern programs, no funding received yet and the administrative burden has increased while funding has decreased
- Larger states have been helped by burden, because they have staffing for process. They are able to get more since the smaller states can't afford to go after funding although for some small states, a P2 grant may be the difference between having a P2 program and not having one
- Michigan funds P2 program with tipping fees on hazardous waste.
- Kentucky funds P2 program by 20 percent of hazardous waste fee and 80% superfund, but has a sunset date for 2016

- Funding innovation – interns paid by businesses
- Is there an NPPR role for teaching grantsmanship or funding?
- There needs to be a clearinghouse of calculators and metrics. Something that rates models and shares those models.
- Suggested funding:
 - National Estuary Foundation – Program Grant – Department of Labor grant for green jobs
 - Department of Agriculture – rural assistance grants with farmers
 - Small Business Assistance for small businesses related to energy

Session 2 – SWOT – EPA P2 Program SWOT (Attachment B), NPPR SWOT (Attachment C), P2Rx SWOT (Attachment D)

Presenter: Tom Tillman (EPA P2 Program SWOT)

Strengths – legislation, high results, greenhouse gas emissions results, P2 contribution to sustainability, economic benefits, infrastructure for pollution prevention information

Comments:

- Funding for grants
- Ability to be innovative, think outside the box
- Technical expertise and leveraging those expertise
- Multi-media group in EPA has much broader and holistic approach to environmental management
- Community of practice

Opportunities – engage partnerships, multi-media, fully leveraging resources, greener and more sustainable economy, increase business revenues, expanding the role of P2

Comments:

- Legislation is under utilized
- P2 is integrated in TRI regulations but more could be done to take full advantage of our TRI authority
- Working with other agencies in Federal government and with states regarding environmentally preferable purchasing; they're all focused on procurement
- Concern over saying P2 saves money, not always costs that drives people to the action
- EPA has a central role to play in sustainability – as a convener and collaborator, especially on social side, which has been underutilized.
- ORD discussion on Green Chemistry is an opportunity for PPD to engage
- Most successful efforts have been partnerships under specific sectors
- Sector approach can get national outreach
- TRI and 33/50 was great success, and could be used as behavior change model
- P2 as cornerstone of sustainability, work on message
- Transparency is an opportunity
- Toxics
- Social media opportunities (e.g., develop P2 apps for your iPhone, Web 2.0)

- P2 intern programs
 - Programs don't touch a large enough group; need to incorporate P2 in engineering exams (i.e., the Engineer-in-Training exam, and the Professional Engineering exam)

Weaknesses – Businesses not understanding benefits of P2, prevention hard concept to get mind around, P2 programs are perceived as voluntary, P2 has lost some of its brand identification

Comments:

- P2 not a “core” environmental program; it should be a core function of EPA.
- Not cultivating expertise in newer hires as P2 experts retire or move on.
- Prevention is difficult; have not matured model of engagement.
- Need broader awareness of P2
- P2 underfunded and understaffed
- Awareness of P2 within EPA, but less aware outside of EPA; P2 needs an awareness program (like Energy Star)
- Consumer awareness of broader impact of P2 is needed, beyond that of businesses and government
- Michigan has given money for pollution prevention seminars to be taught, since internships only reach 7 students
 - Integration of pollution prevention into basic curriculum

Threats – Reduced P2 programmatic resources; competition for limited resources

Comments:

- Political realities – movement is away from voluntary programs (and those perceived as voluntary, such as P2)
- Threat of success - there is assumption P2 work is done, so P2 programs are no longer needed; that industries are not doing P2, not elevating the role of P2 and sustainability; there's a lack of visibility of P2 in work of sustainability
- Financial issues with NPPR continue to linger

Session 2 (Continued) – Measurement

Presenters: Terri Goldberg, Natalie Hummel, and Jeff Burke

- PowerPoint Presentation was given by Terri.
 - Overall shows value in what is achieved
 - Communication of what is achieved is probably a weakness area
 - P2 National Results – Results are not all EPA funded, some data is voluntary
 - Behavioral changes are adopted P2, trained P2, developed EMS, developed P2 team, mapped process, improved compliance, implemented P2 suggestions, and increased awareness of P2.
 - Still need to look more closely at data reported
 - Quality Assurance (QA) issues, capacity of programs around QA. Are QA's only a paperwork requirement or are they meaningful?
 - How to capture consumer behavior?
 - Next P2 Results Task Force call is scheduled for April 12 at 2 EDT

- Metrics important for EPA to show results for funding
- What is being done at EPA on metrics, discussed by Natalie
 - Strengthened RFP with stronger guidance on what EPA is looking for in regards to metrics
 - Measurement guidance – need to update?
 - Over 400 people attended webinars on P2 tools
 - Working on webinar in April with PPRC on P2 tools
 - P2 grants plus database, hopefully rolling out in September
- What calculators and tools do state programs need?
 - Session at National Environmental Sustainability Summit in Detroit to discuss sustainability metrics
 - Session will be Thursday afternoon
 - Job creation and retention
 - Private Sector tools – Global Reporting Initiative (GRI), Energy and Material Flow and Cost Tracker (EMFACT), certification workbooks and checklists
 - Discussion of Global Reporting Initiative (GRI) that is being done to come up with global set of measures
 - Resource sustainability – metrics to lead people to question about the management of resources
 - Advocates for some local GRI, which is well recognized
 - GRI not filtered to small businesses
 - Support
 - P2 Results upgrade
 - Data calculators and tools
 - Training, capacity building
 - QA best practices
 - Training to e-learning

Action Items

- Tanya will report out on P2 and sustainability strategy once she hears back on recommendations – 4/15
- Investigate P2 grant competition and opportunities to alter – Beth Anderson 6/15
- Sharing of grant boiler plate – Jeff Burke 4/15
- Share information on “successful calculators – Jeff Burke 4/15
- P2 on PE/EIT certification exams – Robert Jackson 6/15
- Marketing of P2 results – Jeff Burke 6/15
- Case studies information sharing – Jeff Burke 6/15
- Use of social media – Jeff Burke 6/15
- Transition training to e-learning – Tanya Mottley 6/15
- Build on P2 Results (Jeff Burke 6/15) and develop sustainability results (Kirk Mills 6/15)
- Revise EPA P2 Program SWOT for P2 Coordinator meeting in Detroit (Tom Tillman 4/15)
- P2 as Core program, integration with states – Tanya Mottley 4/15

Thursday, March 31

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Session 3 – Sustainable Products

Presenter: Tanya Mottley

- Power Point Presentation

- Discussed issues with green and sustainable products
 - Over 400 eco-labels on the market
 - FTC working on a green guide, but does not define sustainability or organic.
 - Defining EPA's role in green products
 - Deputy administrator charged agency programs to develop options on EPA's role
 - Cross-agency work group of senior staff initiated last September
 - Solicited public comments on what people thought EPA's role should be, received a wide range of input, over sixty people attended a listening session
 - General agreement on EPA's role in science
 - Co-leading workgroup with GSA on standards, etc.
 - Talking to USDA about Bio-preferred label
 - Bio-preferred label does not address concerns to health or environment
 - Only says that it's a bio-based feedstock
 - Others working on green products:
 - Keystone Center's Green Products Roundtable
 - Focus on policy side
 - Composed of public/private folks in what is needed in standards, also what is needed to promote green and sustainable products
 - Group still has a lot of work to do and is moving slowly
 - The Sustainability Consortium
 - Focus on measurement side
 - The Packard Foundation/Walton Foundation/Mars
 - Focus on science side
 - Objective – Not to start another dialogue, but become better informed in order to participate most effectively in national dialogue
 - Next steps (waiting on response):
 - Strategic Framework for EPA
 - Six main areas of the framework under consideration
 - Values in green standards and products
 - Setting standards and verification systems – characteristics and good components
 - Prioritization of green products
 - Define role in eco-labeling

- LCA/data/research – think about impacts from design development, use, discard
- Advancing sustainability through innovation and other means
- Hope to have options for EPA’s role targeted by late spring/early summer 2011
- Working on green products website
 - Portal for standards, other sites, information on green products

Comments:

- Won’t know what EPA will need from states until they hear back on the approval of the strategic framework. They will engage the states once they know how they will be moving forward.
- EPA does not want to undermine what states are already doing.
- Northeastern states had issues with the EPA’s green cleaning effort. It had created some perception issues. Companies saw it as a certification, but states said there wasn’t enough transparency. Any strategy needs to be clear on what is being done.
- It was requested that states need assistance working through standards that already exist, or standards for the standards.
- New York State has under their legislation to ask manufactures for ingredients in all their cleaning products. The state is working on figuring out how to do that.
- The Interstate Clearing House has eleven state members and one local government member.
- Washington State has identified fifty chemicals of concern and has legislation requiring manufacturer disclosing of those, Children’s Products.
- Green Screen, cooperation with Green Production Action, looks at chemicals and safer alternatives.
- GHG impact or overlay not accounted for in green cleaning products

Presenter: Libby Sommer, U.S. EPA Headquarters

- Power Point Presentation on Design for the Environment (DfE) Program

- Process:
 - Every ingredient in the product is reviewed in the context of its functional use class, and the formulation as a whole is reviewed
 - There are two third-party reviewers for the DfE Safer Product Labeling Program.
 - Both have a standard product fee and a fee per ingredient. There is a fee for auditing, but no fee for label use.
 - Once a product meets the DfE Standard for Safer Cleaning Products, parties enter into a Partnership Agreement
 - Recently audits were added (as of 2010)
- Began labeling products in 1997, now there are 2,500 products with the label
- Stakeholder groups helped add proposed enhancements, such as audits
 - Group membership list is on the DfE website
 - Waiting on management approval of additional enhancements that posted for public comments last November

- Outreach of the program
 - A grocery store chain has partnered with DfE for advertisement in aisles
 - Working to get it on the local weathercasts , both Energy Star and WaterSense have done this
 - Working to advertise on home show
- Alternatives Assessment
 - Evaluate chemicals of concern and their alternatives
 - Provide information for industry to make safer choices
 - Six (fluid) steps to conducting alternatives assessments
 - Currently conducting assessments on:
 - BPA in thermal paper
 - Flame retardants
 - HBCD in insulation (banned in the EU)
 - decaBDE in plastics
 - TBBPA in printed circuit boards
 - Phthalates
 - NP/NPE
- DfE Best Practices program www.epa.gov/dfe/best_practices.html
 - Reduce worker and community exposure to chemicals that have no safer substitute
 - Diisocyanates in automotive refinishing
 - Spray Polyurethane Foam (SPF) initiative
 - Sometimes called a “green” product due high R-value and soy base component, but limited recognition about the health concerns for diisocyanates

NPPR’s Safer Chemicals Industry Challenge

Presenter: Lissa McCracken

- Lissa provided the group with an overview of the challenge draft

Comments:

- Requirement for companies to inventory all chemicals in use
- Share results with P2 Results data system
- Bring in trade association folks
- ENTAP programs and SAC companies
- EMfact in tools

Session 4 – Pollution Prevention in Education

Presenters: Robert Jackson, Rick Yoder, and Lissa McCracken

- Robert highlighted the Michigan student intern program
 - Program has been around for ten years
 - Students do both pollution prevention and energy efficiency
 - The internship is for four months in the summer
 - Six students are placed per year
 - Students are mentored by a retired engineer in their retired engineer program (RETAF)

- The state has partnered with universities
 - They also do seminars at the universities on pollution prevention and energy efficiency
 - Curriculum is set up for engineering and natural resource programs at universities
- Outcomes of program are long term relationships with universities and industry. Students are taught to use a pollution prevention mindset. Students become leaders and advocates of the program. Most students are hired by the companies
- Program has joined in the E3 partnership to use students to carry out projects
 - If the program is an energy efficiency problem they can provide financial assistance for the project implementation
- Rick Yoder presented
 - Three levels:
 - Education – curriculum development
 - Institutional approaches on sustainability include an MBA concentration on sustainability and courses on-line.
 - Community colleges can provide training for green jobs
 - NSF funding directed to training at community colleges
 - Research and Publishing
 - Uniqueness for researchers and Universities
 - Services – Intern Program
 - Engineering focused
 - Program has been around 15 years
 - Other educational components, NWF on campus engagement, engineers without borders, Princeton Review does sustainable campus ratings, Beyond Grey Pinstripes Aspen Institute
 - Professional Organizations – Metropolitan colleges; marketing, engineering and all disciplines, AASHE
- Lissa McCracken highlighted KPPC work related to education
 - Students do Co-ops at KPPC on energy efficiency and pollution prevention
 - Students are treated as regular employees and also attend professional development training
 - Between 2 – 6 students per semester
 - Do some presentations to engineering classes
 - P2 Fun Factory
 - Outreach with faculty and staff on technology
 - Researchers also use students
 - Sustainability Council
 - Looks at curriculum, building, facilities, etc.
 - Work with Partnership for Green Cities
 - Make presentations to various groups

Action Items

- Future dialogue agenda – Jeff Burke 6/15
 - Discuss retired engineer programs, how they work and how to operate
- DfE webinar – Jeff Burke 4/15

- PPTs from Dialogue – Jeff Burke 4/15
- Tool Time PPT – Lissa McCracken 4/15
- Research P2 Curriculum – Gary Hunt and Rick Yoder 6/15
- List of Research Projects at University of Louisville – Lissa McCracken 4/15
- Safer Chemistry Industry Challenge
- P2 Results conversation – Jeff Burke 5/15
- Sustainable Green Products update – Tanya Mottley 6/15
- Send notes from meeting – All 4/4

Attachment A

Date Published: 09/20/2010
Title: Pollution Prevention Week

Colleagues:

With Pollution Prevention (P2) Week here, it is time once again for us to celebrate the progress we have made in reducing pollution at its source, and recognize the importance of integrating pollution prevention into our work.

Protecting public health and the environment requires a strong prevention approach that minimizes pollution in the first place and avoids environmental problems before they begin. The Pollution Prevention Act of 1990 gave our nation a strong start in this direction, and as we celebrate the 20th anniversary of that Act this year, we must recommit ourselves to the goal of pollution prevention and take the next steps to more fully achieve it.

Across EPA, our pollution prevention efforts have helped protect children and families in this country from exposure to harmful pollutants and significantly reduced the amount of contaminants released into the environment. For example:

- Energy Star has eliminated millions of tons of greenhouse gases and other air pollutants by cutting energy demand.
- Programs like WasteWise and Plug-In To eCycling have eliminated billions of pounds of solid waste.
- WaterSense has achieved enormous reductions in water and energy use by promoting water-efficient appliances.
- Our green electronics, green chemistry, green engineering and Design for the Environment (DfE) programs have reduced the use of toxic materials in everyday items like computers and household cleaners, giving consumers a real choice to use less toxic products.

As we have promoted Pollution Prevention, we have been working closely with states, local governments, international organizations, environmental groups and industry to identify pollution prevention opportunities. A great example is the Economy, Energy and Environment (E3) Program, which is helping manufacturers reduce costs and become more efficient, competitive and sustainable.

In the private sector, many companies are going green and building pollution prevention into their operations. These companies recognize that pollution prevention is good for the environment and their financial bottom lines.

But even with all these successes, there is much more to be done. That's why it is important on this 20th Anniversary of the Pollution Prevention Act to recommit EPA to the principles of pollution prevention. We need to expand our efforts to promote innovative P2 solutions and apply them to the environmental challenges our Nation faces. This includes voluntary, regulatory, compliance, enforcement, information collection, communication, research, and grant-making activities, all of which are vital tools for building a sustainable future.

We must have a strong cross-Agency pollution prevention and sustainability strategy to keep us moving in the right direction. To that end, I am directing the Office of Chemical Safety and Pollution Prevention to lead the coordination of pollution prevention efforts at EPA and work with all the offices to develop recommendations for how we can more fully integrate P2 in our programs, enhance internal and external collaboration, focus our resources more effectively and use our information tools to better document progress in pollution prevention. I am asking that these recommendations be delivered to me by March 1 next year.

I am counting on each office, each Region, each program and each individual at EPA to contribute as we develop and implement strategies for strengthening and expanding our pollution prevention efforts. Pollution prevention will help us continue to achieve a cleaner environment and a healthier and more sustainable economy.

Thank you again for all your work.

Sincerely,

Lisa P. Jackson
Administrator

SWOT Analysis of EPA's Pollution Prevention Program

March 2011

Strengths

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- The Pollution Prevention Act establishes formal P2 mandates and priorities; TSCA provides authority for chemical risk management and sustainable products
- Proven results in reducing wastes, increasing efficiency and saving money over broad areas, including greenhouse gases, toxics and water use
- Proven program capabilities in consensus building, partnerships and recognition
- Leads and contributes to sustainability dialogues and voluntary consensus standards development
- Well integrated with regulatory chemicals programs and associated scientific/ technical expertise
- Offers well-established national network of technical assistance and technology transfer
- Builds and participates in a strong P2 and sustainability network including federal, state and local government agencies, tribes, NGOs, universities, businesses and professional organizations
- Serves as a recognized source of information and expertise on P2, green products, and sustainability; businesses look to P2 programs for practical solutions to improve the environment and the bottom line.
- Demonstrated success in risk reduction through source reduction and risk management
- Demonstrated potential for long-term economic and environmental benefits through P2 practices

Weaknesses

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- Not enough businesses understand the environmental and economic benefits of P2 or the central role of P2 in pursuing sustainability
- Small businesses, in particular, are most in need of P2 assistance but are hardest to reach since these businesses don't have the time/resources to invest
- It's inherently difficult to measure the benefits of a preventative approach, making it more challenging to determine results based exclusively on P2
- P2 programs are widely perceived as "voluntary only" rather than using the full spectrum of regulatory and non-regulatory tools
- P2 has lost some of its brand identity

Opportunities

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- More fully engage Federal leadership to highlight the central role of P2 as the cornerstone of sustainability
- Pursue multimedia, market-based, sustainable solutions for businesses, the public sector, and others
- Work with federal agencies, states, tribes and local governments to more fully leverage resources
- Contribute to a greener and more sustainable economy through the implementation of P2 practices
- Communicate the value of a P2 approach and its role in sustainability through better use of our case studies and documented results
- Increase business revenues and significant cost savings through the implementation of P2 practices
- Use P2 life-cycle opportunities and expertise in chemicals in products to reduce health and environmental impacts throughout key industry sectors
- Expand role of P2 in regulations; use the current regulatory review process (EO 13563) to include P2 options and remove barriers

Threats

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- Challenges associated with measuring results of programs closely associated with voluntary activities makes them particularly vulnerable for resource reductions or suspension
- Reduced P2 programmatic resources and any future reductions in P2 state and regional grants complicates the ability to advance region-specific P2 practices and implement programs on a national level
- Competition for resources and attention with deadline-driven regulatory programs
- Inefficient single-media “stovepipe” focus difficult to replace with an efficient multi-media, cross-program approach.

SWOT Analysis for NPPR

October 2010

Strengths	Weaknesses
<ul style="list-style-type: none"> • Pollution prevention (P2) has proven value to the economy, environment and worker safety. Focus on pollution prevention saves money and protects the environment without needing the command and control system. • NPPR members: technical image; professional; dedicated; have institutional knowledge; good team spirit; pollution prevention knowledge base; passion for P2! • Accomplishments of members in implementing P2 and building information resources (e.g., P2Rx). • Respect and recognition by US EPA, UNEP, other international P2 organizations, other professional organizations. International scope of our efforts. • Good partnerships with all levels of government, NGO's and business including P2Rx, SBEAP, MEPS, EPA, regional Roundtables, and international roundtables. • NPPR Board: member driven; representative, dedicated; good structure; good mix of new and "seasoned". • Improved communication/relationship with PPD/OPPT. • Measurement system and tools; increased emphasis on outcomes not outputs (performance based environmental requirements). Measurement – more experience than almost anyone in documenting emission/waste reductions, cost savings, and improvements in environmental performance. • Summit: diversity of speakers and papers; opportunities to network • P2 Integration – expertise in merging voluntary programs with regulatory ones to provide more flexibility and incentives for meeting environmental performance goals. • Cross-media Impacts- P2 excels at evaluating and eliminating cross-media impacts to minimize "unintended consequences" and protect the environment. • Innovation - P2 excels at generating innovation in practices and technology to provide environmental benefits. • Network – state membership, state organization • People involved are both management and technical • Professional connections – Network of folks 	<ul style="list-style-type: none"> • Fading interest in P2 as a policy or major concern; P2 is getting a little stale. We need new tools, new energy; P2's niche is not growing; lack of "sex appeal" for P2; some states see P2 as "been there, done that". • P2.org Web site needs work. • Limited ability of NPPR staff resources to undertake projects; lack of in-kind resources so Board and general member time can be devoted to advancing organizational mission; lack of financial resources. • Member diversity – mostly limited to state and local programs; weak state programs provide minimal support; some cities/counties with strong programs are not represented; limited involvement of academic community. • Limited visibility on Capitol Hill • Lack of strong local government presence. • Members with solid funding and good P2 brand remain committed to traditional P2; many other P2'ers evolving/adapting to broader missions like sustainability and climate change.

- Meet with EPA folks, connections with senior folks

Opportunities

- Be proactive in national debate on a Chemical Use Policy. Other P2 policy issues.
- State workgroup
- Lean Workgroup – Consider MOA or MOU with NIST MEPs; Interaction with MEP's; Small manufactures for NPPR, NIST big ones
- Promote business benefits of P2; financial benefits of P2; market P2 as an efficiency/total quality improvement tool; promote P2 results; push economic incentives associated with P2.
- Sustainable products initiative; EPP folks in states, people to track sustainable products initiative
- Raise the profile of P2 nationally (national publications and on the Internet)
- Policy involvement; work with other NGOs
- Recognition of P2 Act, Lisa Jackson asked PPD to further integrate P2 across the agency; Cross-agency P2 plan
- Increase involvement of businesses and other organizations.
- NING Hospitality Site
- Increased activity & interest in workgroups. Workgroups given specific projects, problems to solve, and/or goals to work no. (e.g. Lean to work on NIST question)
- Support proposed discussions on legislative changes to TSCA.
- Explore opportunities to form a strategic relationship with OSHA (i.e., implementation of proposed GHS labeling rules. Note: there are linkages between the rules and P2).
- Promote P2 and NPPR programs to service and retail businesses in addition to industrial and/or manufacturing. Recruit a corporate leader for P2.
- Brownfields green training
- Have small local regional pollution prevention training workshops be an effective way to spur interest in NPPR.
- Promote P2 as a compliance assistance strategy to state regulatory programs and to businesses. P2 can result in regulatory burden reduction for the state programs and the businesses.
- Educate consumers on how they can prevent

Threats

- Diminished funding for P2 and subsequent impact on state/local programs; P2 programs are getting marginalized.
- Lack of understanding of pollution prevention connection to problems of energy security, sustainability, and natural resource conservation.
- Lack of training, standards to make P2 a profession.
- Pollution prevention is not a “mandated” program.
- Similar yet confusing terms (sustainable consumption and production; cleaner production; eco-efficiency).
- Climate change – the new “hip” project, moving resources from pollution prevention to climate change.
- Green washing – promote green practices, but companies are not truly green.
- Pollution prevention funding on level to sustain NPPR.
- Command and control approaches marginalize integration and stifle innovation.
- Sustainability/climate change becoming more important to EPA/public/state and local government/funders; P2 and NPPR risk being left behind with movement toward these other issues; if not involved soon, P2'ers could become marginalized as technical specialists instead of key players in addressing sustainability/climate change issues.

Attachment D

SWOT Analysis for P2Rx

<p>Strengths</p> <ul style="list-style-type: none"> • Networking, people know us, content sharing, variety of products • Multiple regional views of issues a strength – allows me to see emerging issues, Multiple university based programs could leverage similar distance-learning capacities • Wide diversity of talents in center staffs, good to have coordinator not be a center director because of conflict of interest • Diversity, combined resources, national coverage 	<p>Weaknesses</p> <ul style="list-style-type: none"> •
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<p>Opportunities</p> <ul style="list-style-type: none"> • 	<p>Barriers</p> <ul style="list-style-type: none"> • EPA changing their mind, Funding limits, staff limits/turnover • Centers have had to be competitive, this has weakened the group, RFP is written in a way that isn't supportive of the network, name doesn't help us, what does "P2Rx" mean? P2 Regional coordinators work in competition – that doesn't help network, University-based programs have long lead time – need information much sooner than other centers. • Some centers don't feel the P2Rx grant enables a larger agenda, instead it stands on its own. There is little connectivity or support from the region, and they're not offering much value to their TAPs. Staff is stretched way too thin trying to keep up with other centers without enough FTE. • Not one entity, uneven – variation in service/support, EPA lack of support/marketing, Evaluated to death, time consuming and lack of focus, working for P2Rx or other centers vs. working for your center.
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