

MANAGING SHARED WATERS

REMARKS BY DR. ALLAN JONES, COUNCIL OF GREAT LAKES INDUSTRIES

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ON BEHALF OF THE COUNCIL OF GREAT LAKES INDUSTRIES (CGLI), I APPRECIATE THE INVITATION BY THE ORGANIZERS TO PROVIDE AN INDUSTRY VIEWPOINT INTO THIS RETROSPECTIVE OF THE GREAT LAKES WATER QUALITY AGREEMENT.

FOR THOSE PRESENT ATTENDING THE CONFERENCE WHO ARE FROM COUNTRIES OUTSIDE NORTH AMERICA, CGLI IS AN ORGANIZATION OF COMPANIES AND TRADE ASSOCIATIONS WITH BUSINESS INTERESTS IN THE GREAT LAKES BASIN. OUR MEMBERSHIP IS DIVERSE — CHEMICALS TO AUTOMOBILE MANUFACTURERS TO FORESTRY AND ENERGY GENERATION. OUR MISSION STATEMENT IS TO PROMOTE THE ECONOMIC GROWTH AND VITALITY OF THE REGION IN HARMONY WITH ITS HUMAN AND NATURAL RESOURCES (I.E. SUSTAINABLE DEVELOPMENT). WE HAVE LONG BEEN INVOLVED IN GREAT LAKES MATTERS ASSOCIATED WITH THE WATER QUALITY AGREEMENT.

THE MOST SIGNIFICANT ASPECT — AND SUCCESS - OF THE GREAT LAKES WATER QUALITY AGREEMENT - IN MY OPINION - IS THAT IT CREATED A BROAD FRAMEWORK FOR GOVERNMENTS AND SOCIETY TO FOCUS ON MECHANISMS AND APPROACHES TO ADDRESS THE PROBLEMS OF CRITICAL POLLUTANTS IN THE GREAT LAKES. IT ALSO INCORPORATED A BASIS IN ANNEX 2 - THE REMEDIAL ACTION PLAN AND LAKE-WIDE MANAGEMENT PLAN PROCESSES - FOR VOLUNTARY AS WELL AS REGULATORY INITIATIVES TO ADDRESS ITS GOALS. INDUSTRY HAS PARTICIPATED ACTIVELY IN THE LOCAL ACTIVITIES IN AREAS OF CONCERN AND IN LAKE-WIDE AND BASIN WIDE PROGRAMS. IN EVERY AOC THAT I HAVE VISITED AS PART OF MY ROLE WITH THE IJC SCIENCE ADVISORY BOARD, THE ZEAL AND COOPERATION BETWEEN RAP TEAM MEMBERS FROM VARIOUS SECTORS AND INTERESTS HAS BEEN IMPRESSIVE.

THROUGH SUCH INITIATIVES AND THE REGULATORY PROGRAMS AT STATE, PROVINCIAL AND FEDERAL LEVEL THAT EITHER FOCUS ON OR ENCOMPASS THE GOALS OF THE AGREEMENT, MANY OF THE POINT SOURCES OF CRITICAL POLLUTANTS HAVE BEEN ADDRESSED.

COMPANIES INVESTED IN NEW TECHNOLOGIES TO ELIMINATE DISCHARGES, CHANGED OR ELIMINATED PRODUCTS AND HAVE ESTABLISHED INDUSTRY STANDARDS TO MEET THE OBJECTIVES OF THE AGREEMENT. THE SIGNIFICANT REDUCTIONS IN LOADINGS OF CRITICAL POLLUTANTS TO THE GREAT LAKES IS A MATTER OF RECORD BY BOTH PARTIES.

BUT WE RECOGNIZE THAT THERE IS STILL MORE TO BE DONE BY INDUSTRY AND OTHER SECTORS OF SOCIETY. THERE ARE STILL FISH CONSUMPTION ADVISORIES AND CONCERNS FOR HUMAN AND ECOSYSTEM HEALTH IN THE GREAT LAKES. AND THE PROBLEMS ARE GETTING MORE COMPLEX, RATHER THAN LESS:

FIRST, THE SOURCES OF POLLUTANTS ARE LESS CLEAR. AS POINT SOURCE RELEASES HAVE DIMINISHED, RESEARCH, MONITORING AND SURVEILLANCE PROGRAMS ARE REVEALING OTHER ROUTES BY WHICH POLLUTANTS ENTER THE WATERS OF THE LAKES INCLUDING LONG RANGE TRANSPORT.

SECOND, THE TOXICITY ENDPOINTS ARE LESS CLEAR — NO LONGER ARE WE FOCUSING SOLELY ON ACUTE TOXICITY, REPRODUCTIVE TOXICITY AND CARCINOGENICITY — WE ARE NOW DEALING WITH ENDOCRINE DISRUPTION, DEVELOPMENTAL NEUROTOXICITY AND EPIDEMIOLOGICALLY-DRIVEN OBSERVATIONS ON POPULATION HEALTH. IN SOME CASES THESE ARE ENDPOINTS WHERE WE ARE STILL DEVELOPING AND VALIDATING THE TEST METHODS TO DETERMINE WHETHER OR NOT A SUBSTANCE — OR MIXTURES OF SUBSTANCES - PRESENTS A HAZARD.

THIRD, WE ARE IDENTIFYING NEW PERSISTENT SUBSTANCES OF POTENTIAL CONCERN.

FOURTH, WE CAN DETECT LOWER AND LOWER LEVELS OF JUST ABOUT EVERY SUBSTANCE KNOWN. IN THE YEAR THAT THE GREAT LAKES AGREEMENT WAS SIGNED, I WAS AN ENVIRONMENTAL CHEMIST STUDYING THE FATE OF NEW CANDIDATE PESTICIDES. OUR ROUTINE DETECTION LIMITS WERE 0.5 TO 0.1 PARTS PER MILLION. WE CAN NOW ROUTINELY ANALYZE 1000 TIMES MORE SENSITIVELY. ARE THE VIRTUAL ELIMINATION TARGETS OF 1978 THE SAME FOR 2002 . OR WILL THEY BE THE SAME FOR 2022?

FINALLY, AND PERHAPS MOST IMPORTANTLY, WE ARE BEGINNING TO FACE THE BALANCE OF FOCUS BETWEEN CHEMICAL INTEGRITY AND THE PHYSICAL AND BIOLOGICAL INTEGRITY ISSUES WITHIN THE LAKES, NONE THE LEAST BEING THE WAY IN WHICH ALIEN INVASIVE SPECIES ARE CHANGING THE LAKES. AT A RECENT BNTS MEETING, MR. SHORNACK, THE LEAD COMMISSIONER FOR THE UNITED STATES ON THE INTERNATIONAL JOINT COMMISSION SPOKE ABOUT THE THREE-LEGGED STOOL OF CHEMICAL, BIOLOGICAL AND CHEMICAL INTEGRITY. I QUOTE:

Chemical, physical, and biological processes interact one with another such that it is hard think of chemical contamination without also thinking of bioaccumulation or sediment re-suspension. And it is hard to think of alien invasive species without also thinking of physical vectors like canals, or treatments like filtration or the use of biocides. In short, the ecosystem approach contemplated by the GLWQA is an integrated approach requiring equal attention to all three legs of ecological integrity.

TO BUILD ON ELIZABETH DOWDSWELL S ZEN STATEMENT OF YESTERDAY, AFTER ENLIGHTENMENT, THE LAUNDRY . I THINK WE NEED TO REVIEW THE LAUNDRY LIST.

- WHAT ARE THE PRIORITIES?
- WHERE ARE THE RESOURCES?
- HOW FAR DO WE GO TO ACHIEVE VIRTUAL ELIMINATION AND ZERO DISCHARGE? AND AT WHAT COST?
- ARE THERE NEW EXPECTATIONS OF INDUSTRY?

ALL THESE QUESTIONS ARE ASSOCIATED WITH THE CORE ISSUE OF HOW TO ENSURE THAT THE AGREEMENT IS ADDRESSING CURRENT AND FUTURE CONCERNS. THE POSITION OF CGLI IS THAT THE BASIC AGREEMENT IS SOUND. IT HAS SERVED US WELL OVER THE LAST QUARTER CENTURY. BUT THERE IS LITTLE ARGUMENT THAT SOME OF THE ANNEXES ARE IN NEED OF UPDATING, PARTICULARLY ANNEX I. A NUMBER OF THE STANDARDS AND THE ATTAINMENT TARGET DATES IN THE ANNEX WERE REACHED AND SURPASSED LONG AGO.

IF WE DO REOPEN THE ANNEXES AND SET NEW SPECIFIC OBJECTIVES, WE NEED TO ENSURE WE ARE FOCUSING ON PRIORITIES FOR ACTION:

- THE FOCUS MUST BE ON THE DOABLE AND THE IMPORTANT.
- SOME SUBSTANCES CANNOT BE ABSOLUTELY ELIMINATED.
- A RECOGNITION THAT ZERO IS IMPOSSIBLE TO ATTAIN.

IN CONCLUSION, THERE HAS BEEN SIGNIFICANT PROGRESS IN THE REDUCTION OF THE LEVELS OF CRITICAL POLLUTANTS IN THE GREAT LAKES UNDER THE GREAT LAKES WATER QUALITY AGREEMENT. HOWEVER, THERE ARE NEW CHALLENGES AHEAD AND WE NEED TO DECIDE WHAT IS IMPORTANT AND WHAT IS NOT. WHATEVER EMERGES, I AM CONFIDENT THAT INDUSTRY IN THE GREAT LAKES WILL CONTINUE PLAY ITS PART.

THANK YOU.