



Positions on Public Policy Remedial Action Plan

The Council of Great Lakes Industries (CGLI) supports a cooperative, multi-stakeholder approach to the Remedial Action Plan (RAP) process, which embraces the principles of sustainable development.

Background

The International Joint Commission (IJC) has identified 43 Areas of Concern (AOC) in the Great Lakes region where persistent toxic substances, conventional pollutants and other stressors are impairing local uses of the water. The RAP process identifies water quality problems and identified specific actions that need to be taken to address the problems. The RAP process has been undertaken pursuant to the Great Lakes Water Quality Agreement that was signed in 1978 by the United States and Canada to "...restore and maintain the chemical, physical, and biological integrity of the waters of the Great Lakes Basin ecosystem."

Position

The CGLI believes that the RAP process enables a cooperative approach among stakeholders to address water quality issues. These partnerships should foster a public policy environment which will stimulate industrial redevelopment and private investment that is protective of water resources.

The success of the RAP process can be enhanced by:

- Recognizing the on-going efforts of business, industry, agriculture and other stakeholders to address water use and water quality goals;
- Continuing the regulatory simplification and streamlining process to reduce time and costs spent in regulatory review and to eliminate impediments to action;
- Utilization of cost/benefit evaluations on all stressors in choosing among alternatives for addressing use impairments;
- Government development of coordinated and/or innovative funding mechanisms for implementing cost effective measures addressing use impairments;
- Providing incentives for the development of innovative, cost-effective, clean-up technologies and strategies;
- Recognizing that in some cases a "do nothing" approach is protective and appropriate; and
- Insuring that all stakeholders, including non-point source stakeholder representatives, have the opportunity to participate fully.

Industry Responsibilities as Articulated by the CGLI

Promote industry involvement in the RAP process. Stakeholder industries should provide the resources to actively participate in the RAP process to ensure that relevant issues are identified and addressed, that existing programs are tapped, that additional regulatory burdens are not created, and that resources are not wasted by duplicating effort.

Insure that data on habitat, land use, and exotic species issues, as well as on persistent toxics that bioaccumulate, is collected, monitored, shared, and utilized. In order to effectively solve problems, it is

important that the problem statement be correctly defined based on meaningful data (managed with the scientific method).

Pollution prevention practices must be shared. Pollution prevention is a key in the continuous improvement of the Great Lakes water quality. To ensure the implementation and deployment of cost effective pollution prevention techniques, business, industry and agriculture should be willing to join with others in setting mechanisms to foster information sharing among stakeholders.

Recommendations

Develop consensus methodologies for analyzing the relative costs (short-term and long-term) and benefits of addressing any given use impairment. Trade-offs identified in decision making need to be made known so that the implications of a selection will be clear. The current process for determining what projects are initiated often lacks quantitative technical and/or economic data.

Remove regulatory barriers that inhibit RAP progress. The regulatory context within which government agencies implement RAP recommendations needs to be better defined. The overlap of authorities representing towns, counties, sewer districts, Provinces, States, Federal governments, etc. represents a formidable barrier in addressing water quality problems with any sense of speed. Streamlining the regulatory process for RAPs would enhance the overall effort. Further, it would clarify where proposed activities in Phase 1 RAPs are redundant with existing regulations.

Provide financial incentive for the development of new remedial technologies and strategies. Tax incentives, or other positive financial motivation, should be provided for those parties interested in the development and/or implementation of cost effective new technologies to be used in addressing use impairments.

Ensure that RAPs are coordinated effectively with brownfield efforts. Brownfield redevelopment sites should be financed, remediated, and developed in a manner that protects water quality. RAPs should be implemented in a manner which enhances brownfield redevelopment.

Develop a greater understanding of relative source contributions (e.g. point vs. non-point, local vs. distant). Utilize knowledge of source contributions to use impairments, along with mass balance modeling, to prioritize action plans. Identify and pursue only those action plans locally which will significantly and cost effectively address identified use impairments in the Areas of Concern (AOC).

Summary

The Council of Great Lakes Industries supports the RAP process and the restoration of the Great Lakes' water quality. Eliminating regulatory barriers, providing incentives for new remedial technologies and strategies, encouraging the use of consensus cost-benefit methodologies, and prioritizing projects appropriately, will enable RAPs to proceed much more effectively. Quantifiable goals must be biologically based, practical and achievable in the RAP areas of concern. With the successful implementation of RAPs, quality of life will be improved, as will the economic outlook for the present and long term.

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