

# **Taking a Full Lifecycle Approach to Environmental Regulatory Compliance**

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# Identification of Regulated Materials

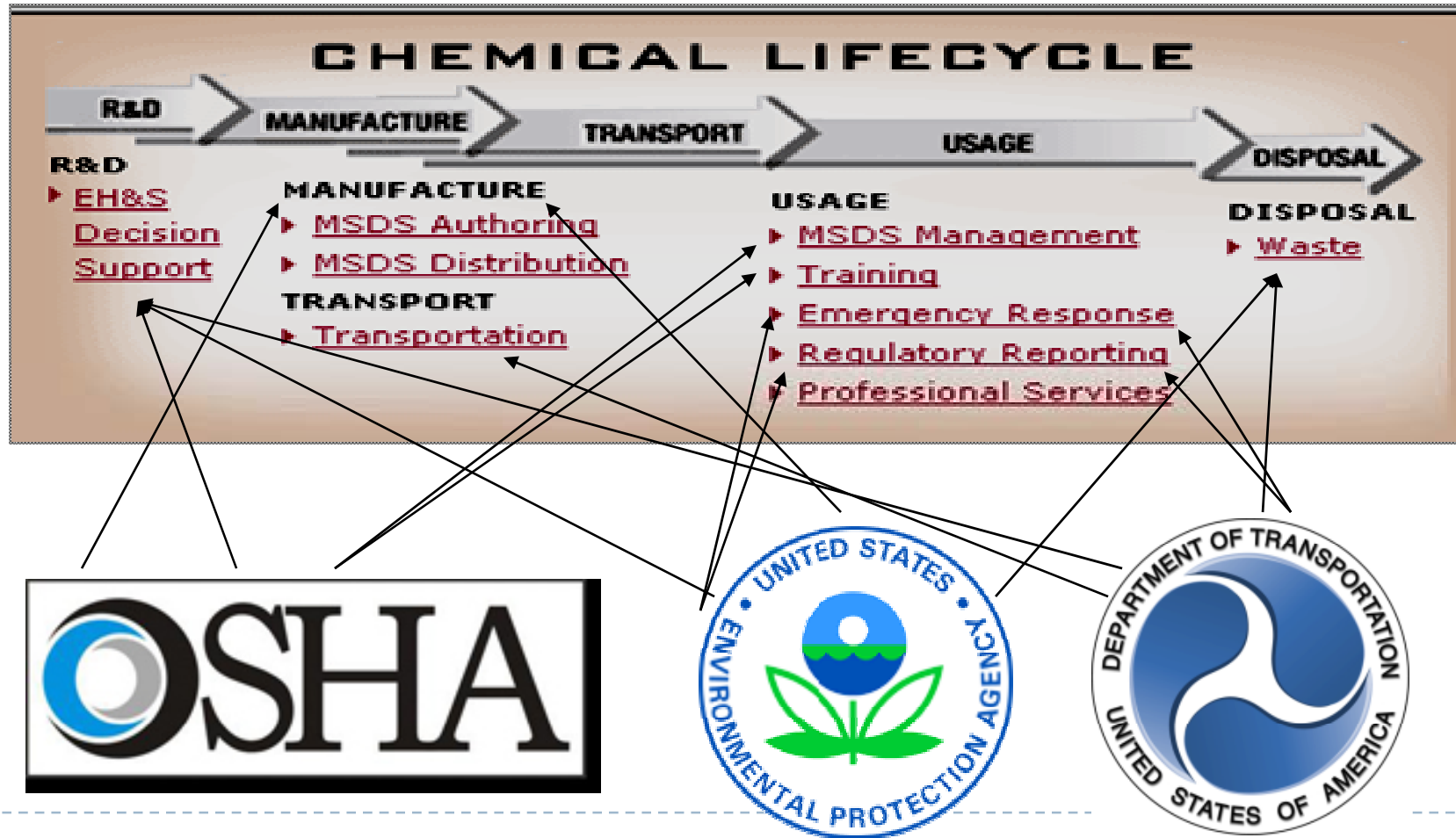
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- ▶ Chemical inventory
  - ▶ Use chemicals
  - ▶ RMs, mixtures and compounds
  - ▶ Finished goods
- ▶ CAS# / Substance-level breakdown
- ▶ **Best Practice**: Assume a material is regulated until proven otherwise



# Life Cycle Compliance

Hazardous chemical regulations cover the entire product life cycle.



# Compliance Analysis

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- ▶ Determine the applicable life cycle stage
- ▶ Access to applicable regulatory content
  - ▶ State/Provincial, Federal, Global
  - ▶ Environmental, Health and/or Safety
- ▶ Identify agency authority
  - ▶ Compliance requirements and parameters for each
  - ▶ Applicable exceptions
  - ▶ Frequency of required submissions (permits, disclosures, registrations, etc.)
- ▶ Note: One arm of an agency may have an annual reporting requirement (EPCRA – SARA Tier II, TRI), while another may enforce requirements for labeling, time on site, accumulated quantities (RCRA).



# Resource Analysis

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- ▶ Within your organization, is there sufficient access to:
- ▶ Regulatory content
  - ▶ Full text regulations
  - ▶ Supplemental documentation (overviews, inspection procedures, etc.)
  - ▶ CAS# / Chemical-specific regulated lists
- ▶ Substance and product level data
  - ▶ Product formulations
  - ▶ Physical and chemical characteristics
  - ▶ Scientific data



# Resource Analysis (continued)

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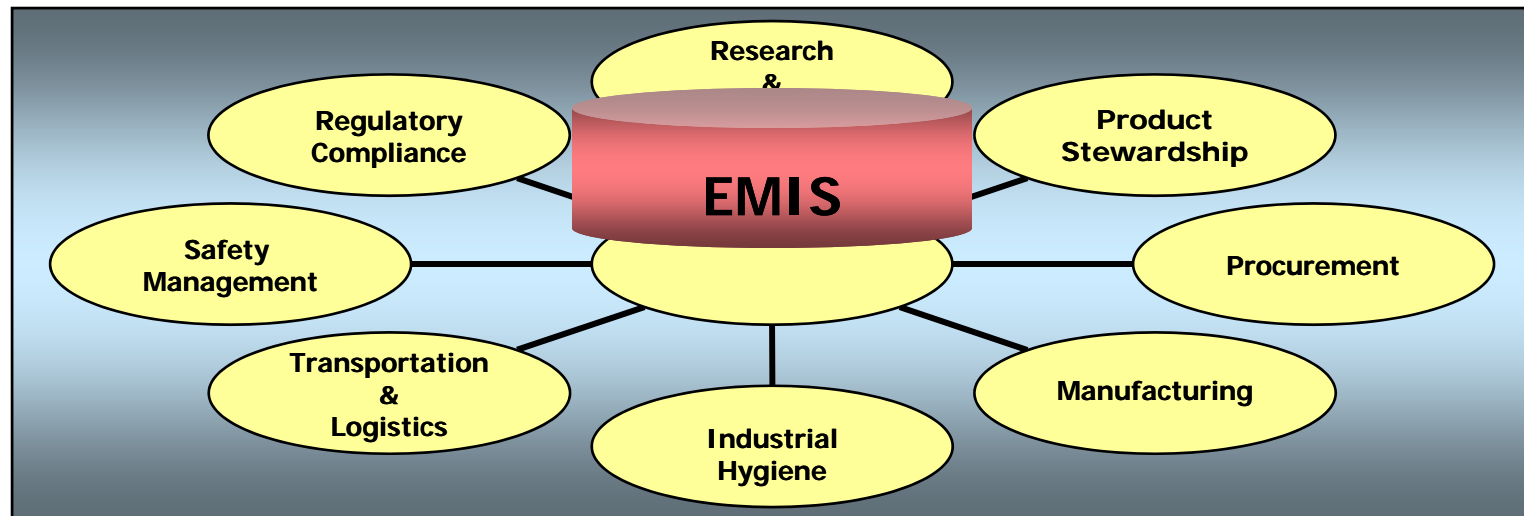
- ▶ EH&S expertise
  - ▶ R&D – Product Stewardship
  - ▶ Manufacture
  - ▶ Usage
  - ▶ Transport
  - ▶ Waste
  - ▶ Environmental
  - ▶ Legal Review



# Lifecycle Efficiencies

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- Identify EMIS Stakeholders – VP of Risk Management, Compliance & Ethics Offices, VP of Sales
- Power Users



- Beneficiaries – Employees, Downstream Users
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# Lifecycle Efficiencies (continued)

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- ▶ Universal repositories and reference libraries that can be leveraged throughout the organization
  - ▶ Data aggregation and integration
  - ▶ Accessibility throughout the supply chain from cradle to grave
- ▶ Information Renewal and Maintenance
- ▶ The currency of information is paramount to any successful EMIS. When your Power Users access integrated data to assist in decision making or regulatory reporting processes, how will you ensure they have the most up-to-date
  - ▶ Chemical inventory lists
  - ▶ MSDS
  - ▶ Global regulations
  - ▶ Chemical composition level data
- ▶ If one system or process is updated, is there method to update all other affected systems and data?



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Questions?

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Thank You

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