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TLG CLIENT BULLETIN

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Is the recycling of your product important?

A discussion of global pressures on product manufacturers

The momentum continues for product manufacturers to initiate a plan on the life cycle of their products. Take a few moments to consider the following recent events:

- **In Europe**, the European Union (EU) has announced a proposal to force manufacturers of electronic goods to fund a plan that will properly dispose of "orphan" (*waste that is*

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not traceable to any one particular manufacturer) electronic equipment. This proposal is expected to become the center of vigorous debate. Additionally, there is a proposal for a regulation to restrict the types of materials that can be used in equipment manufacturing.

- **In California, USA**, it is now illegal to dispose of any kind of cathode-ray tube (CRT), or television monitor, in any of the California municipal solid waste landfills. These devices are considered hazardous waste and should be disposed of accordingly. The state is now moving toward strongly insisting that the manufacturer is the ultimate responsible party for safe handling and disposal of their respective products.
- **Various activist groups** have begun to aggressively make public statements in the media, such as the statement made by the Silicon Valley Toxics Coalition, "Electronic equipment is one of the largest known sources of heavy metals, toxic materials, and organic pollutants in municipal trash waste."

- **Hewlett Packard** has recently opened a 4 million dollar recycling center, in California, USA, designed to recycle parts and materials related to computer hardware and similar products. Hewlett Packard stated they intend to open similar operations in Tennessee, USA. Other sites selected for future operations are Europe, Canada, Latin America, and Asia.
- **In Latin America**, a number of countries are promulgating recycling requirements specific to product types, and materials used. They are requiring environmental impact studies as to the potentials of improper disposal of products. Specific requirements already exist on materials, products, and packaging materials.

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The Lion Group provides specialized services related to global packaging restrictions / requirements.

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These recent events indicate the intense and growing notion that manufacturers are responsible for their products from "cradle-to-grave". In times past,

some manufacturers of specific types of chemicals and plastics were the focus of both the media and the public. Other manufacturers of different products, such as foods, pharmaceuticals, medical devices, and cosmetics, have been of secondary interest. These are also now increasingly impacted by the recycling expectation. It is very important to note that all packaging materials, both primary and secondary, are included in these trans-boundry regulations. Pharmaceutical manufacturers have been required to provide varied levels of environmental assessments, in the past, including impact studies related to distribution, use, and disposal of their products in the product approval process. However, inquires into the packaging materials and disposal are now becoming

common. Packaging questions include concerns as to primary packaging materials used, such as the type of plastics in the containers or types of metals used in devices, as well as the transport materials used, such as cartons and pallets.

TLG Opinion / Comment

Clients should be actively considering the following actions:

- Senior Management should assign a team that includes a professional member from each resource:
 - Environmental, Regulatory Affairs, Purchasing / Materials Management, Manufacturing, and Research & Development.
- The team should establish an action plan in the following order:
 1. An endorsement from Senior Management for the team and its mission statement.
 2. Establish "hard" crossroads with dates and planned accomplishments for the team to report activities.
 3. Access and review all products / packaging to document what materials are used. (Do not forget to include transport packaging and any labeling materials.)
 4. Establish what the applicable regulations require; then determine and document the present level of compliance, on a global basis, of the company.
 5. Draft and approve position documents so that a response to any inquiries from the public and/or government can be quick and accurate.
 6. Establish and create a permanent design for the environment team.

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How may we serve you?
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TLG Global Regulatory HIGHLIGHTS

LEAD SAFETY STANDARD

New studies are prompting new concerns about employee exposure to lead. The concerns raise questions as to the variations in long- and short-term

health aspects and acceptable levels of exposure. The Johns Hopkins School of Public Health conducted the study. The study may result in changes to current standards.

CAL/OSHA BOOKLET

The California Occupational Safety & Health (CAL/OSHA) recently announced the availability of a newly revised Appeal Information booklet and Appeal form to help employers who receive citations alleging health and safety violations of Title 8, California Code of Regulations, and the California Labor Code.

BRITAIN'S HSE - SIGNIFICANT CHANGES

Britain's Health and Safety Executive (HSE) has recently proposed that all employers must investigate all work related accidents, illnesses, and any 'near miss' incidents.

ENERGY USAGE

As discussed in previous TLG Client Bulletins, energy usage is becoming more regulated, and the focus of environmental agencies and inquires.

WORKERS IN A NUMBER OF INDUSTRIES SHOWING INCREASING INCIDENCE OF BRAIN CANCERS

A large number of tasks, which have varied material exposures, are indicating a high number of brain cancer incidences. The tasks include agricultural, manufacturing of rubber and plastics, exposure to solvents and fuels, apparel and textiles; in addition, employees in electric services, electrical equipment, plumbing, and heating and air-conditioning. The Department of Epidemiology and Public Health of Yale University published the findings.

EU CLEAN AIR

The EU has begun a probe and will promulgate new regulations relative to air emission sources, and their specific environmental and health aspects. The study has specific factors expected to be investigated and will take 3 years.

THE CHANGING TIDE IN US CONGRESS AND REGULATORY DIRECTION

Due to the recent changes in power within the United States (US) Congress, businesses can expect more regulations in environmental, health, and safety matters. Obviously, energy, environmental regulations, and ergonomics will be proposed. Further expectations in development of Cuba as a market may happen in a quicker period than expected.

CLEAR PLASTIC MACHINE GUARDS NEED REVIEW

Recent studies conducted by Britain's HSE indicate that polycarbonate panels (Clear Plastic) break down after time. TLG has access to the HSE risk assessment document, which includes simple formulas for calculating impact resistance values.

Contact TLG
for further information
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"SNAPSHOT" of TLG Projects

Buenos Aires, Argentina

Permit for a client's new joint venture for a petrochemical manufacturing site.

Sao Paulo / Belo Horizonte, Brazil

Audits of client's facilities, operational permit amendment submitted, and management training session.

Ponce, Puerto Rico

Assisted client in response to EPA (Region 2) inquiry.

Dublin, Ireland

Executive Management Seminar regarding EH&S issues and introduction to TLG's Footprint system.

San Jose, Costa Rica

Assisted client in regulatory submissions required for manufacturing site closures.

Strausborg, France

Participated in a successful acquisition negotiation between clients.

Birmingham, Alabama, USA

Facility audit.

Pasadena / Sacramento, California, USA

Assist client in response to EPA inquiry.

Fort Myers, Florida, USA

Presentation for client management group seminar.

Dallas / Houston, Texas, USA

Air emission review, expansion review and permit application, and site closure related regulatory submissions.

Bellvue, Washington, USA

Design for the environment team program enhancement and training.

Other notes of interest:

- A 45-minute overview presentation package of THE LION GROUP *Regulatory Consultants* Footprint system is now available. **Call for further information.**
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- TLG customized the Footprint system for a client in a high technology industry.
- TLG has recently been selected by a global medical device manufacturer to conduct site reviews as requested.
- TLG has been selected as a resource for a global manufacturer of electronic devices for special projects related to obtaining regulatory approvals for new manufacturing sites in the Americas.



OUR GOAL IS TO
FOOTPRINT
YOUR SUCCESS 

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