

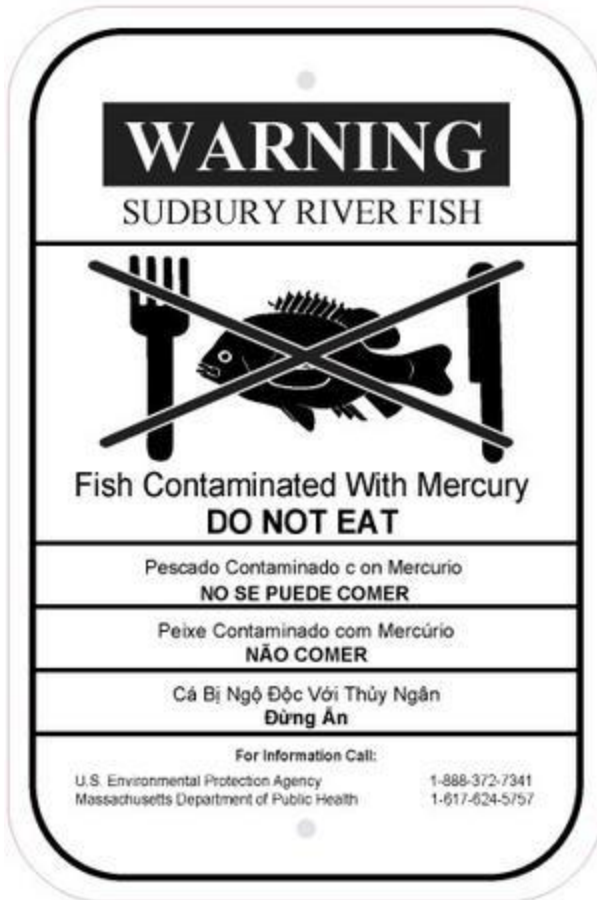
The Interstate Mercury Education & Reduction Clearinghouse (IMERC)

A Model for Multi-State Collaboration on
Chemical Ingredient Disclosure



October 16, 2013

Regional Mercury Action



Conference of the New England Governors & Eastern Canadian Premiers 1998 Goal:

“virtual elimination of the discharge of anthropogenic mercury into the environment”

Regional Mercury Action Plan:

“reduce/eliminate the use of mercury in medical & consumer products to the extent feasible; identify & implement source reduction programs & develop model legislation; draft model legislation implementing coordinated labeling & manufacturer take-back programs to help consumers identify products containing mercury & how to properly dispose of them...”

Mercury Education & Reduction Act

In 1999, NEWMOA developed model legislation to:

- Help achieve virtual elimination goal
- Develop consistent state programs, allowing for flexibility
- Simplify industry compliance
- Reduce duplication of state efforts

Key elements of the Act:

- Product disclosure – “notification” & labeling
- Product sales bans
- Product phase-outs with exemptions – identification of alternatives & product collection
- Interstate Clearinghouse to support implementation

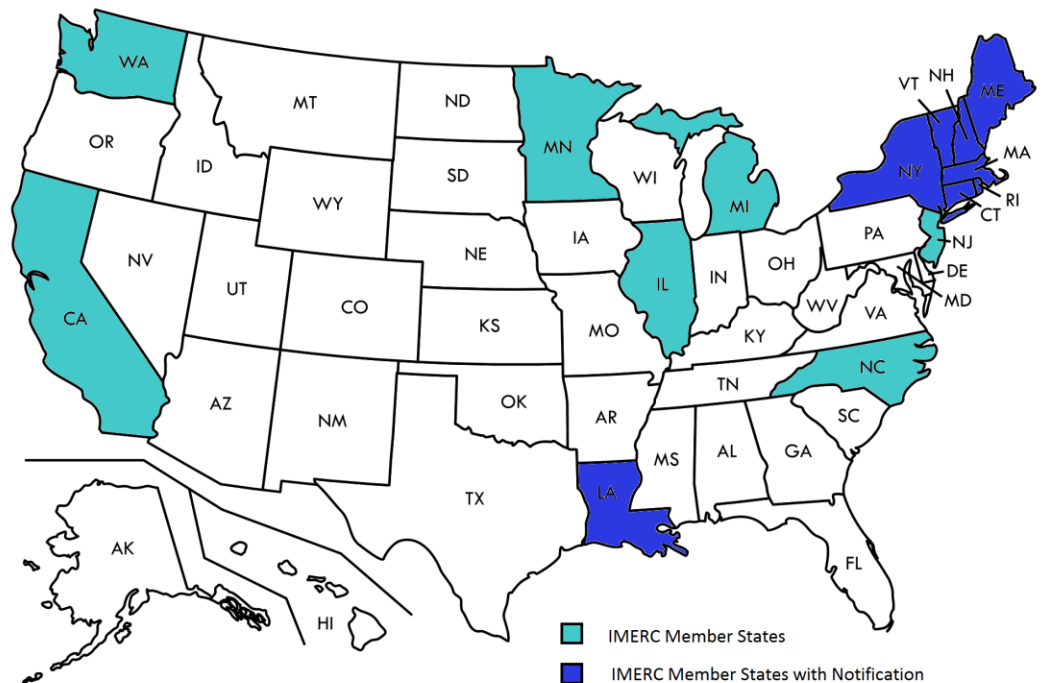


Development of IMERC

IMERC launched in 2001 by Northeast states to serve as single point of contact for public & industry

States passed enabling legislation over next 6 – 10 years; used similar framework; not always consistent

2013: 15 members



Product Notification

8 states with common reporting requirements – CT, LA, MA, ME, NH, NY, RI, & VT

Harmonized approach – common form that is collectively reviewed, discussed, & approved

Product categories developed by IMERC with input from industry – prior: no common standards

First reporting cycle in 2001 – reporting required every three years (4th cycle now complete)



Product Notification Form

(1) Product or Category of Products that <u>YOU</u> Manufacture, Distribute, or Import	(2) Description & Location of Mercury-Added Components Contained in Product (if applicable)	(3) Number of Components in One Unit of Larger Product (if applicable)	(4) Amount of Mercury in Each Product (or Component) in Milligrams or Parts per Million	(5) How Amount of Mercury is Reported (Range or Exact)	(6) Purpose of Mercury in Product or Component	(7) Total Amount of Mercury in all Units Sold in the U.S. in Calendar Year in Grams

1. Product Name/Category
2. Component Information – Description and Location in Product
3. Number of Components in Product

4. Mercury Content
5. Reported in Range or Exact Amount
6. Purpose of Mercury
7. Total Mercury Value

Product Notification

More than 500 companies reporting – thousands of product listings

E-filing system & new Mercury-added Products Database launched in 2011 – more reliable data, immediately accessible

Full IMERC Database available on EPA's Environmental Information Exchange Network;
seeking data flow partner



IMERC Mercury-added Products Database



MERCURY-ADDED PRODUCTS DATABASE

• Browse By Product Category

• Browse By Company

• Customized Search

Select a product category for a list of companies that make that product.

Displaying 44 companies that manufacture Appliances, or components used in Appliances

Appliances	Detail	Company Name
Batteries		Access Business Group LLC
Computers		American Air & Water, Inc.
Dental Amalgam		Atwood Mobile Products LLC
Displays/screens		Ballantyne of Omaha, Inc.
Electronics		Barnstead International
Formulated Products		Beverage-Air Corporation
Heating/cooling Equipment		Blodgett Oven Co.
Industrial Machinery		Broan-NuTone LLC
Lamp Fixtures		Brown Stove Works, Inc.
Lamps		Carrier Commercial Refrigeration, Carter-Hoffmann
Measuring Devices		Carrier Commercial Refrigeration, International Cold Storage
Medical Instruments		Carrier Commercial Refrigeration, Tyler Refrigeration
Miscellaneous		Carrier Commercial Refrigeration, Wells-Bloomfield
Office Equipment		Duke Manufacturing Co.
Pumps		Electrolux Home Product, Canada
Relays		
Sensors		
Switches		
Thermometers		
Thermostats		
Toys		
Valves		
Vehicles		

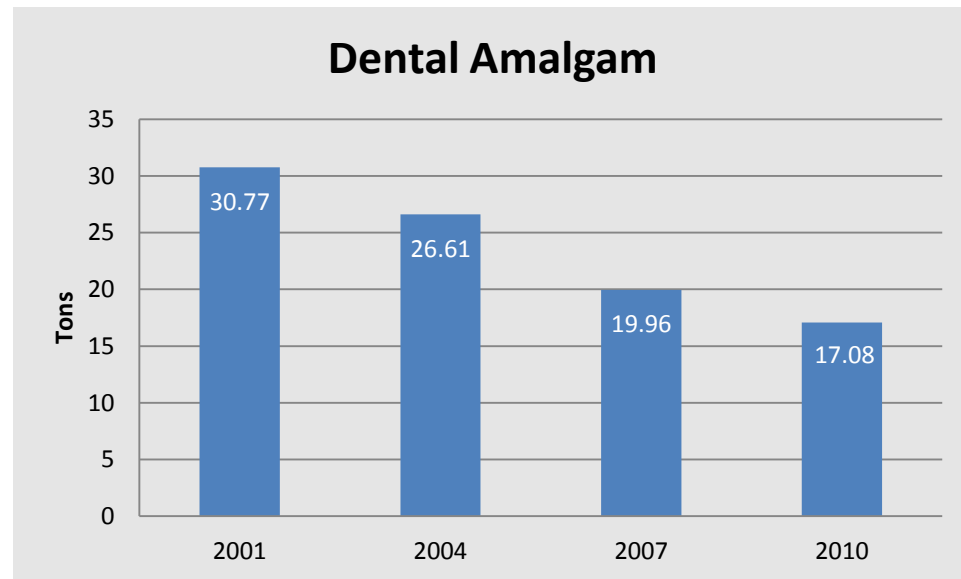
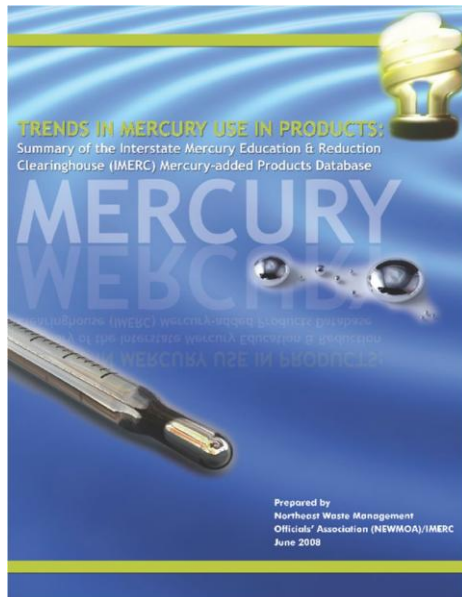
Uses of the IMERC Data

- Tracks progress toward achieving virtual elimination goal
- Provides a source of national data on universe of mercury used in products & total in products sold
- Clarifies the universe of products & categories (e.g., switches & relays, measuring devices, lamps, batteries, & thermostats)
- Creates better understanding of end-of-life impacts
- Informs policies related to labeling, collection, & bans/phase-outs
- Facilitates compliance with other state mercury product requirements



Uses of the IMERC Data

- Product category fact sheets
- Trends analysis – assessing success of efforts



Total Mercury Sold in Products in the US (draft)

2001 – 2010 (Tons)

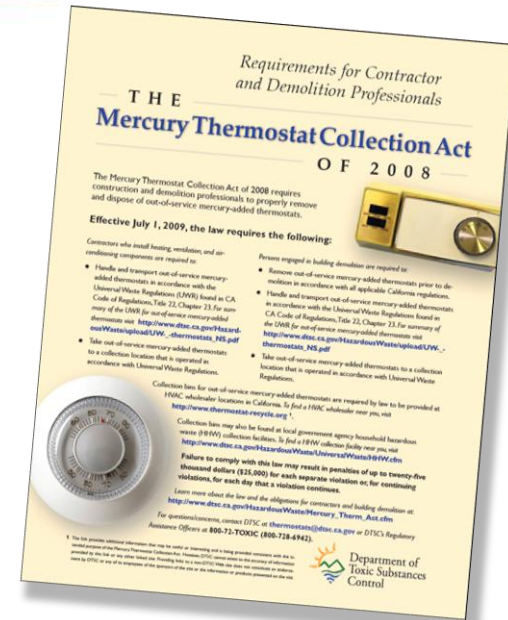
Product/Component	2001	2004	2007	2010	Percentage Change 2001 - 2010
All Categories	129.53	111.52	71.70	56.71	56%
Switches & Relays	60.07	51.44	29.93	19.43	68%
Dental Amalgam	30.77	26.61	19.96	17.08	44%
Thermostats	14.63	14.45	3.74	0.17	99%
Lamps	10.71	10.07	10.65	8.40	22%
Batteries	2.79	2.47	2.07	7.12	155%
Measuring Devices	5.12	3.05	1.13	0.77	85%
Formulated Products	1.20	1.04	1.45	1.37	14%
Misc.	4.25	2.40	2.78	2.38	44%

Lessons Learned

- Define data collection needs at the outset – ID goals before starting database development
- Begin stakeholder discussions early in the process
- Promote industry collaboration to understand products & identify best ways to collect data
- Maintain constant outreach - vital to program success
- Minimize free form text in data collection forms

Future of IMERC

- Continue outreach & education
- Coordinate enforcement
- Support end-of-life collection & disposal efforts
- Use information to help continued phase-down of uses & promote alternatives assessment
- Continually update analysis & product fact sheets
- Use product disclosure information to highlight successes & challenges



Questions for Small Group Discussion

- What are your goals for chemical use disclosure?
- What do you want to learn from the data?
- How will you use the knowledge / what analysis will be performed?