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In the “Crosshairs” of an Environmental NGO

2007 Annual Spring Meeting

Mercury Issues Workshop

March 18, 2007



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The Situation

Target: ERCO Worldwide (USA) Inc. mercury cell chlor
alkali plant in Port Edwards, WI.

Sponsoring Non-Governmental Organization (NGO):
Oceana

Oceana's Strategy: Multi-faceted initiative targeting the
entire value chain. Field agent sent to Wisconsin to
coordinate/implement tactics.



Oceana's Tactics

- ERCO customers
- State and federal agencies (WDNR, EPA, and OSHA)
- Coordinated efforts with other environmental groups
- University of Wisconsin – Madison
- Local and State media
- Local testing for mercury
- Voice mail, email and postcard campaigns to corporate officials



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ERCO's Customers

Letters from Oceana to ERCO's customers:

- Asking them to switch to mercury free products.
- Propaganda relating to the hazards of mercury in the environment



State and Federal Agencies

- WNDR/EPA agencies completed all required/recommended audits and inspections of the plant.
- State agency referred OSHA to our plant resulting in over 5 days of detailed analysis of our mercury management and industrial hygiene programs.



State and Federal Agencies

- Wisconsin Conservation Congress
 - Advisory body to WDNR
 - Initially recommended non-renewal of air permit
 - Final resolution recommended no creation of mercury credits
- Permitting – actively commenting on environmental permit application
- Electric rate cases – filed testimony and appeared in public hearings



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Other Environmental Groups

- National Resource Defense Council (NRDC)
- Mercury Free Wisconsin
- Sierra Club
- League of Women's Voters
- Wisconsin Public Interest Research Group
- Mercury Policy Project
- Greenpeace



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University of Wisconsin - Madison

- Wisconsin Public Interest Research Group (WISPIRG) – student chapter
- Campus environmental groups
- Campus student housing



Local and State Media

- Purchased full page ad in local paper titled “Is Your Neighbor Poisoning You?” with shaded silhouette of pregnant woman in background
- Articles in local (2) and state papers citing the hazards of mercury in the environment and the contribution of state mercury emissions by ERCO.
- Articles exploited concern regarding health to pregnant women and their babies.
- Local demonstrations



Local Testing for Mercury

- Hair samples collected in local community and tested for mercury levels. 25+ people participated
- Ambient air testing completed around the perimeter of the plant.



Results of Testing

- Majority of hair samples indicated non-detectable levels of mercury levels. A couple of samples had levels just above the detection level.
- Oceana stated that they would NOT publish the results of hair sampling.
- Air monitoring indicated time weighted levels well below state limits. Oceana presented air results during conference on “Mercury As A Global Pollutant” in Madison, WI.



Oceana Ambient Air Study

- Instantaneous readings as high as 955 ng/m³ and as low as non-detectable
- Oceana compared instantaneous concentrations to chronic standards (ATSDR minimal risk level of 200 ng/m³, EPA reference concentration of 300 ng/m³)
- Wisconsin state standard is 1000 ng/m³ average over 30 days
- 2002 WDNR study over 42 days obtained 61 ng/m³ average



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Campaign Against Corporate Officials

- Hundreds of emails sent to President of ERCO within an hour
- Almost 1000 post cards signed from UW-Madison students
- Hundreds of phone calls to plant and corporate offices
- Letters to corporate officials



Essential Survival Tactics

- Develop strong relationships with local stakeholders.
- Work to assure that your plant is viewed as a valuable community asset.
- Be aggressive in environmental performance and proactive regarding your interface with state officials
- Be prepared for increased inspections and audits of your plant and your procedures.
- Have a media strategy, assign a company contact, and prepare media message points.
- Understand the strategy and tactics of the NGO targeting you.