



## Annual Report

### Toxics in Packaging Clearinghouse

#### July 1, 2017 – June 30, 2018

Prepared by Melissa Walsh Innes, TPCH Program Manager  
Accepted by Members October 31, 2018

This report summarizes the activities and accomplishments of the Toxics in Packaging Clearinghouse (TPCH) from July 1, 2017 to June 30, 2018 (FY18), under the management of the Northeast Recycling Council, Inc. (NERC). The first section highlights TPCH's accomplishments in FY18. The remainder of the document is organized by major activity as identified in the TPCH work plan.

#### **FY18 HIGHLIGHTS**

- **Finalization** of a multi-year research project on PVC and packaging. The project included extensive outreach to companies involved in the PVC packaging supply chain. The [TPCH PVC Bulletin](#) was published in the second quarter of FY18.
- **20,578** visitors accessed the Toxics in Packaging Clearinghouse [website](#) in FY18, an increase of 597 annual visits from FY17, with an average of 1,715 visitors per month. There were **68,094** page views on the site.
- TPCH received and responded to **47** general inquiries by telephone and email, an average of 4 per month.
- **Convened** a two-day Annual Membership Meeting in Providence, Rhode Island.
- Conducted **outreach** to 10 non-member state environmental agency commissioners, encouraging their participation as a member in TPCH. Several states responded positively, asking for more information.

#### **TPCH ADMINISTRATION BY PROGRAM MANAGER**

- Manages all aspects, but for finances, of organization including coordination and facilitation of monthly two-hour conference calls with members and occasional Executive Committee planning calls.
- Coordinated and convened a 2-day face-to-face annual membership meeting in Providence, Rhode Island October 17-18, 2018. Coordinated travel and conference room for members, prepared and distributed agendas and all other meeting documents before meeting. Seven of nine member states attended the meeting in person.
- Initial planning of in-person membership meeting scheduled for late October 2018 in Hartford, CT.
- Recorded and distributed minutes for all conference calls and the annual meeting to members.
- Maintained TPCH electronic file of call and meeting minutes and all other TPCH documents.
- Worked with TPCH Executive Committee to prioritize projects and meeting agendas.

- Prepared and distributed TPCCH annual report for FY17 and began work on annual report for FY18; posted [summary report for FY17](#) on TPCCH website.
- Assisted TPCCH Executive Committee chair with edits and review of the TPCCH 2017 PVC Research Bulletin.
- Revised and updated TPCCH outreach documents for website.
- Developed correspondence to engage with agency leadership of 10 non-member states regarding TPCCH membership.

#### ◆ **Program Reporting**

- Prepared and distributed to members the FY17 Annual Report (July 1, 2016 – June 30, 2017).
- Posted a [FY17 Annual Report Summary](#) on the TPCCH website.
- Prepared the FY19 budget, which was approved by members in April 2018.

#### **TPCCH Financial Management**

- Revenues in FY18 (\$37,074) came in slightly lower than expenses (\$37,377).
- TPCCH began FY18 with a reserve account balance of \$71,355 and ended the fiscal year up with a balance of \$74,760.
- TPCCH CA SEP funds once again covered member state travel to the annual membership meeting; spending \$3,072 of these restricted funds. As of June 30, 2018, the remaining balance in the California SEP account was \$3,345. TPCCH is extremely frugal with spending from this account, initially funded in September 2008 with \$50,000 from a California enforcement settlement. CA SEP funds are anticipated to be enough to cover member travel to the annual membership meeting in FY19.
- Appendix A provides a financial summary for the TPCCH for FY18.
- TPCCH's finances are administered and annually audited as part of the Northeast Recycling Council's operations. The [NERC Audit FY2018](#) is available online.

#### ◆ **Additional Sources of Funding**

No grants or contracts funded TPCCH activities in FY18.

#### ◆ **Executive Committee**

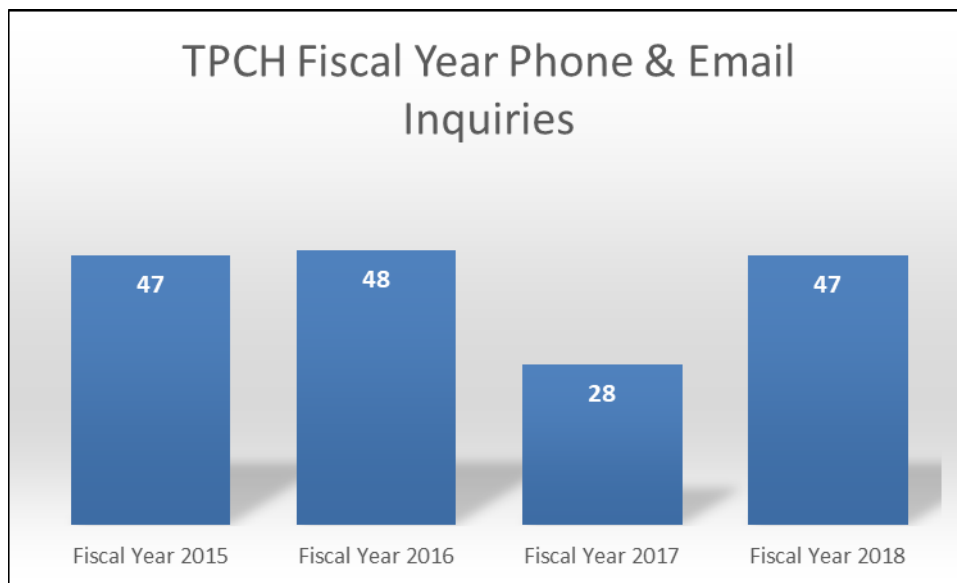
The Executive Committee was in the 1st year of a 2-year term, which ended in June 2018. Executive Committee members included: John Gilkeson, Minnesota, Chair; Peter Pettit, New York, Vice-Chair; Matt McCarron, California, Member-At-Large; and Bev Migliore, Rhode Island, Member-At-Large (ending February 6, 2018 upon Bev Migliore's retirement). Kathleen Hennings, Iowa, current Member-At-Large as of March 20, 2018.

### **GENERAL INQUIRIES & EXEMPTION REQUESTS**

#### ◆ **General Inquiries**

TPCCH received and responded to 47 general inquiries by telephone and email, an average of 4 per month. An inquiry usually requires multiple emails or phone calls to resolve, and some require extensive discussion by members. The number of call and email inquiries in FY18 was dramatically higher than the previous year FY17 (28). The increase in calls and email inquiries was in addition to an increase in website traffic. Website documents and website pages are continually updated throughout the year by TPCCH program staff.

The bar chart below tracks the number of phone and email inquiries to TPCH from FY15 through FY18. The most frequent inquiries continue to deal with the basic requirements of state toxics in packaging laws; how to obtain a Certificate of Compliance; whether a specific item was considered “packaging” under state laws; and testing of packaging components. Appendix B provides a brief analysis of the general inquiries, focusing on the types of organizations requesting information and assistance.



◆ **Exemption Requests**

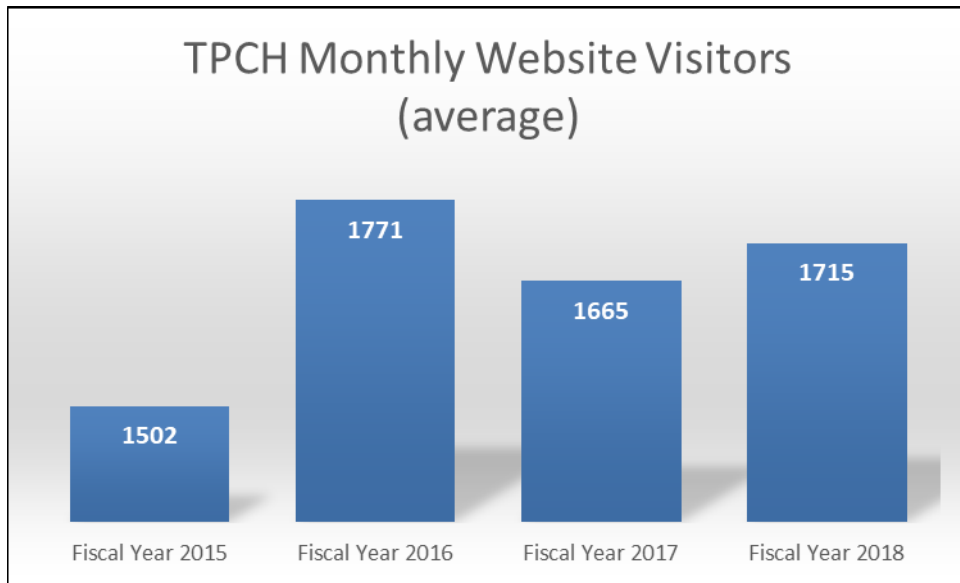
TPCH received no new exemption requests.

**EDUCATION & OUTREACH**

◆ **TPCH Website**

TPCH had 20,578 visits to its website in FY18, 597 more website visits from FY17, averaging 1,715 visits per month. The website visitors participated in 68,094 page views on the site, displaying robust usage of the site and documents as a resource. Consistent with prior years, the top three web pages viewed were the [Model Legislation](#), [Sample Certificate of Compliance](#) and [Frequently Asked Questions \(FAQs\)](#). There is continued need to maintain the website pages and documents to keep all up to date and accessible to all seeking information on the toxics in packaging laws and how to be in compliance.

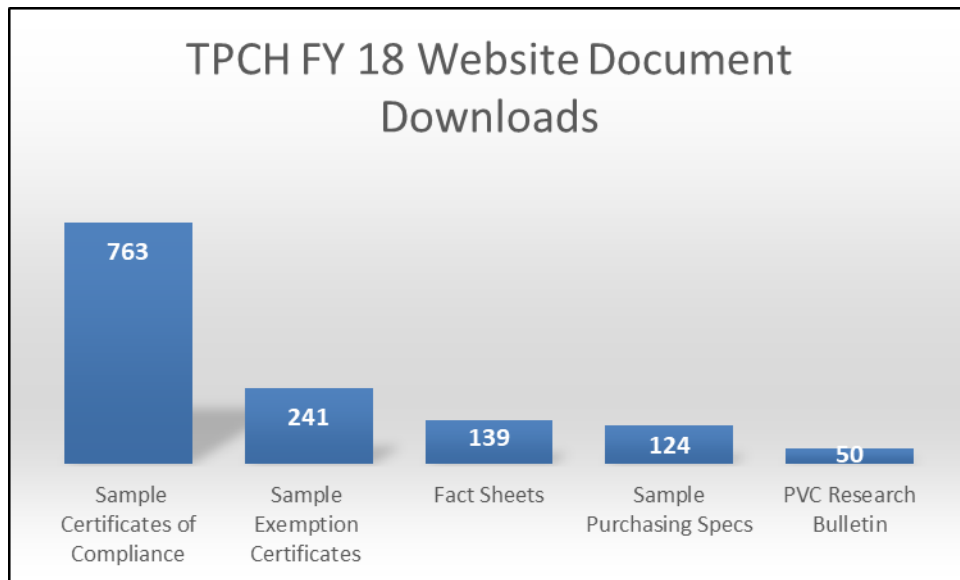
The bar chart below tracks the average number of monthly website visitors from FY15 through FY18.



◆ **Website Utilization – NEW!**

1,847 PDF documents were downloaded from the TPCH website in FY18. The TPCH documents most downloaded were:

- Sample Certificates of Compliance – 763
- Sample Exemption Certificates - 241
- Fact Sheets – 139
- Sample Purchasing Specs – 124
- TPCH PVC Research Bulletin – 50



Document additions to the website in FY18:

- [FY17 Annual Report Summary](#)
- [PVC Research Bulletin](#)
- [2018 Update on Glass and Ceramic Exemption Interpretation](#)

◆ **Presentations**

None in FY18, although an abstract was submitted to and accepted by the North American Hazardous Materials Management Association (NAHMMA). The presentation will take place at the NAHMMA Conference, in Portland, Maine, in the first quarter of FY19.

◆ **Articles, News Briefs and Press Releases**

- [Press Release for PVC Research Bulletin](#)

## MEMBERSHIP

◆ **TPCH Members**

TPCH had 13 members (9 states, 3 industry affiliate members, and 1 independent subject matter expert) in FY18. Member states included California, Connecticut, Iowa, Minnesota, New Hampshire, New Jersey, New York, Rhode Island, and Washington. Affiliate members included the American Chemistry Council; the Glass Packaging Institute; the Steel Recycling Institute; and Chip Foley (subject matter expert).

Following is a list of the lead representative for each member in FY18:

- **California Department of Toxic Substances Control:** Matt McCarron
- **Connecticut Department of Energy and Environmental Protection:** Tom Metzner
- **Iowa Department of Natural Resources:** Kathleen Hennings
- **Minnesota Pollution Control Agency:** John Gilkeson
- **New Hampshire Department of Environmental Services:** Stephanie D'Agostino (August 2016 – July 2017); Melissa Zych (December 2017 – June 2018)
- **New Jersey Department of Environmental Protection:** Steven Rinaldi
- **New York Department of Environmental Conservation:** Peter Pettit
- **Rhode Island Department of Environmental Management:** Bev Migliore (July 2017 – February 2018); Ann Battersby (March 2018 – June 2018)
- **Washington Department of Ecology:** Saskia van Bergen
- **American Chemistry Council:** Steve Rosario (July 2018 – December 2018); Margaret Gorman (January 2018 – February 2018); Erin DeSantis (March 2018 – April 2018); Kuper Jones (April 2018 – June 2018)
- **Glass Packaging Institute:** Lynn Bragg
- **Steel Recycling Institute:** Dave Keeling
- **Independent Subject Matter Expert:** Walter (Chip) Foley

◆ **Member Communication**

Routine correspondence with members was predominantly completed via email and calls, and included conference call agendas and minutes, queries, requests for document review, and compliance issues.

## **TESTING/RESEARCH**

### **COMPLIANCE INITIATIVES**

#### **◆ Coordinated State Efforts**

- TPOCH communicated with a product manufacturer/retailer regarding packaging that was not removed from a warehouse and properly disposed of in a timely manner after being removed from store shelving. TPOCH instructed the product owners on the law and issued specific requests to remove warehoused product packaging and to provide proof that the packaging materials were disposed of properly.
- Ongoing outreach to 11 packaging manufacturers and retailers with potentially non-compliant packaging that was identified in the 2015 Screening Project, specifically ones that had not responded to letters of non-compliance sent by TPOCH. Due to continuing communications, TPOCH did not request any packaging be removed from retail shelves in FY18.

## Appendix A

### FY2018 Financial Summary

#### TPCH Reserve Account<sup>1</sup>

Opening Balance (7/1/17): \$71,355

Closing Balance (6/30/18): \$74,760

#### FY2018 Revenues & Expenses

	Budget	Actual	Actual vs. Budget
<b>Revenue – Budgeted</b>			
Membership dues	\$38,000	\$37,000	97%
Interest	\$50	\$75	149%
<b>Total</b>	<b>\$38,050</b>	<b>\$37,075</b>	<b>97%</b>
<b>Revenue – Unbudgeted</b>			
Grants/Projects			
<b>Operating Expenses</b>			
Administrative fees	\$10,000	\$10,000	100%
Personnel	\$25,850	\$25,913	100%
Meeting expense	\$1,000	\$226	23%
Telephone	\$350	\$225	64%
Postage & delivery	\$100	\$69	69%
Printing, copying, supplies	\$100	\$55	55%
Web design/maintenance	\$0	\$131	
Travel	\$1,000	\$509	51%
<b>Total</b>	<b>\$38,650</b>	<b>\$37,377</b>	<b>97%</b>
<b>GoToWebinar expense</b>	<b>\$250</b>	<b>\$250</b>	<b>100%</b>
CA SEP Personnel			
CA SEP Non-Personnel	\$3,900	\$3,072	
<b>TOTAL CA SEP</b>		<b>\$3,072</b>	
<b>TOTAL EXPENSES</b>		<b>\$40,450</b>	

#### CA SEP Account Summary

<b>Balance Carried Over from Fiscal Year 2017</b>	<b>\$6,417</b>
<b>FY18 Expenses Charged to CA SEP:</b>	
Member travel	\$3,035
Product purchases, misc.	\$37
<b>Total Expenses:</b>	<b>\$3,072</b>
<b>Balance to Carry Over to Fiscal Year 2019</b>	<b>\$3345</b>

<sup>1</sup>Account includes CA SEP funds and carryover funds from prior fiscal years.  
TPCH FY18 Annual Report (July 1, 2017 – June 30, 2018)

## Appendix B

### Analysis of Inquiries

In FY18, TPCCH received and responded to 47 general inquiries, an average of 4 per month. Each inquiry generally takes multiple emails or phone calls to resolve, and some require extensive discussion by members.

Below is a brief analysis of the inquiries, focusing on the types of organizations that requested information and assistance.

- By type of organization:
  - Attorneys
  - Companies (manufacturers, distributors, retailers)
  - Consultants
  - Government
  - Research
  - Testing organizations
  
- By industry sector (for companies and trade associations only):
  - Manufacturers/distributors of finished goods
  - Packaging and packaging components (manufacturers and distributors)
  - Retailers
  - Unknown
  
- By mode of inquiry (note: some queries were by both phone and email):
  - Emails
  - Telephone calls
  - Website “contact us” form
  
- By location:
  - China
  - Germany
  - Japan
  - Mexico
  - United States