The Common Sense Initiative
A NEW GENERATION OF ENVIRONMENTAL PROTECTION

We want to make good on what business and environmentalists have been telling us for two decades — that we must look at whole facilities, whole industries, and their overall impact on the environment. We must do a better job of cleaning up the environment and do it cheaper.

-Carol M. Browner

The current system of environmental regulation is the most advanced in the world and has achieved a great deal over the past 25 years. Many of the large crises have been solved. Rivers no longer catch fire. Our skies are cleaner. Many toxic sites have been cleaned up. But everyone agrees the limits of the current system are near. Laws such as the Clean Water Act were appropriate first-line responses to disasters like the burning of the Cuyahoga River in the summer of 1969. However, the current U.S. regulatory system addresses air, water and land separately, frequently shifting and shuffling pollution without preventing it. As a result, U.S. businesses spent close to $30 billion on environmental compliance in 1992, but still released over three billion pounds of toxic emissions. Today's less obvious, more complicated problems require a new approach to environmental protection.

The current approach has spawned two major obstacles to comprehensive environmental protection. First, innovation and common sense can be stifled by a system of environmental regulation that is too complicated and rigid. A typical small business, for instance, may be subject to as many as ten major environmental statutes that require dozens of reporting requirements without getting the best environmental results. Second, the complexity and rigidity of today's regulatory system often breeds conflict, gridlock, and an adversarial relationship between the concepts of a cleaner environment and a healthy economy. EPA operates under 16 major statutes and under the jurisdiction of over 70 Congressional committees and subcommittees. EPA is subject to over 600 lawsuits at any given time. The current process often diverts valuable resources from the real work of protecting the environment and public health.
What Is the Common Sense Initiative?

EPA Administrator Carol Browner's Common Sense Initiative (CSI) is a fundamentally different vision of environmental policy. Through this initiative, EPA has convened representatives from federal, state, and local governments, community-based and national environmental groups, environmental justice groups, labor, and industry to examine the full range of environmental requirements impacting six pilot industries. These six teams are looking for opportunities to change complicated and inconsistent environmental regulations into comprehensive strategies for environmental protection that all can agree to, with an emphasis on pollution prevention, instead of end-of-pipe solutions. The initiative reflects the Clinton Administration's commitment to setting strong environmental standards, while encouraging common sense, innovation, and flexibility in how they are met. The goal: a cleaner environment at less cost to taxpayers and industry.

The six industries for the initial phase of the Common Sense Initiative are:

- Automobile Manufacturing
- Computers and Electronics
- Iron and Steel
- Metal Finishing
- Petroleum Refining
- Printing

These six industries form a sizeable piece of the American economy, comprising over 11% of the U.S. Gross Domestic Product...

...employing nearly 4 million people...

...and accounting for 12.4% of the toxic releases reported by all American industry in 1992.
How the Common Sense Initiative Works

CSI operates under the Federal Advisory Committee Act (FACA), which specifies how federal agencies may seek advice from outside stakeholders. The Common Sense Initiative Council (CSIC) is the parent council, which coordinates the work of six subcommittees (one per industry sector). The Council and subcommittees have participants representing the stakeholder groups listed above.

Each of the CSI subcommittees have projects underway to test creative alternatives to command and control regulation, including projects to:

- Reduce duplicative reporting requirements;
- Streamline the permits process;
- Improve community involvement in environmental decision-making;
- Find incentives for and eliminate barriers to pollution prevention; and
- Explore alternatives to the current regulatory system to provide more flexibility in how standards are met.

Recommendations made to EPA by these multi-stakeholder teams are being translated into policy and/or regulatory changes, where appropriate. This sector-by-sector approach is expected to bring fundamental change to EPA’s efforts to protect the environment and public health. In addition, these changes may have broad application outside of the six industry sectors currently participating in CSI.

During CSI’s first year, significant progress was made by the six multi-stakeholder teams. The CSI Council and industry subcommittees were formed in January 1995. Approximately 150 subcommittee and workgroup meetings were held in CSI’s first year, during which consensus was reached on priorities and areas of concern for each sector. Thirty-seven projects have been initiated by the subcommittees to test these new approaches and develop policy recommendations.
Examples of CSI projects underway include the following:

- The Metal Finishing subcommittee is working with environmental leaders of the metal finishing industry in Detroit and Cleveland to provide flexibility and reduce regulatory burden on these small businesses in exchange for improved environmental performance. The result will be cost-savings to metal finishers and a cleaner environment.

- The Petroleum Refining subcommittee is rewriting the rules to consolidate, streamline and simplify the air emissions reporting requirements facing oil refineries, as well as to increase access to information by affected communities. The project is now underway in Texas City, Texas.

- The Iron and Steel subcommittee has developed principles to clean up abandoned iron and steel “brownfields” -- urban, contaminated property -- and return them to productive uses. The project will create sustainable economic opportunities with new jobs, while also protecting the environment. Projects are now underway in Birmingham, Alabama and Northwest Indiana.

- The Computers and Electronics subcommittee is working on ways to eliminate RCRA barriers (EPA’s hazardous waste program) to pollution prevention, recycling and water conservation in the computers and electronics industry.

- The Auto Manufacturing subcommittee is designing principles to a more flexible regulatory approach that results in reduced burden on industry, a cleaner environment, and improved community participation in environmental decision making.

- The Printing subcommittee is developing a permit system for printers that provides operational flexibility, reduces pollution across all media (air, water, land), and improves protection of workers, communities and the environment.

**Contacts for the Common Sense Initiative**

General Information: (202) 260-7417

<table>
<thead>
<tr>
<th>Common Sense Initiative Council:</th>
<th>Prudence Goforth (202) 260-7417</th>
</tr>
</thead>
<tbody>
<tr>
<td>Auto Manufacturing Sector Subcommittee:</td>
<td>Carol Kemker (404) 347-3555</td>
</tr>
<tr>
<td>Computers and Electronics Sector Subcommittee:</td>
<td>Gina Bushong (202) 260-3797</td>
</tr>
<tr>
<td>Iron and Steel Sector Subcommittee:</td>
<td>Mahesh Podar (202) 260-5387</td>
</tr>
<tr>
<td>Metal Finishing Sector Subcommittee:</td>
<td>Bob Benson (202) 260-8668</td>
</tr>
<tr>
<td>Petroleum Refining Sector Subcommittee:</td>
<td>Meg Kelly (703) 603-7188</td>
</tr>
<tr>
<td>Printing Sector Subcommittee:</td>
<td>Ginger Gotliffe (202) 564-7072</td>
</tr>
</tbody>
</table>

To be added to the CSI Mailing List, please contact Brenda Collington at (202) 260-7417.