

A call to manufacturers on responsible stewardship of hazardous materials

As a teenager working on the farm in Indiana, I was involved in 4-H and Future Farmers of America. I remember writing an essay in a state competition focusing on soil erosion. It was clear to me then, that if we lost our productive resources, we would not eat—a serious consequence.



John K. Morgan
President and CEO
Acuity Brands Lighting

At no time did I consider that there may be hazardous substances in products we used, and I gave no consideration to sustainable design, greenhouse gases, or even what we would do when the last fish had been caught. How does this relate to the NEMA environmental design initiative?

In our history we, as an industry, may have unintentionally contributed to our present environmental challenges. In an effort to provide value to our customers, we have inadvertently dealt with PCBs, mercury, lead, and asbestos. We're not even aware of what other materials we may find to be hazardous in the future—but surely there will be more.

It is thus a pivotal time for U.S. electro-product manufacturers to take a leadership role in environmental stewardship. Hazardous substance regulatory standards now in effect in Europe are taking root in other markets and becoming the basis of a global network of product design and end-of-life management rules. Manufacturers therefore have a choice: We can continue to follow these mandates as they appear, even though some may result in unsatisfactory substitutions in certain products, or we can channel our technical expertise and business acumen into new remedies that demonstrate a far-sighted commitment to addressing environmental concerns associated with our products.



This latter approach is embodied in the NEMA Board of Governors' recent approval of the strategic initiative on environmental design and product stewardship. In a nutshell, this initiative provides for expanded funding of activities that will help members address product design challenges, promote harmonized environmental regulations across market borders, and broaden NEMA's involvement in the global regulatory policy arena. It reflects the board's vision of NEMA companies serving as recognized leaders and innovators on environmental matters.


A key element of this initiative is the NEMA "Call to Action" on hazardous substances. As we all know, policy approaches to the risks associated with hazardous substances are often heavily influenced by political activists, sometimes leaving industry no choice but to play defense and ultimately conform to onerous, unsubstantiated regulations or market restrictions. This was arguably what occurred in the European Union with the adoption of the RoHS Directive, which provides for restrictions on the use of certain hazardous substances in electrical and electronic equipment.

So why should environmental stewardship be a NEMA priority? For several reasons:

- Responsible action on the part of industry is important to society.
- Our customers, especially architects, engineers, and owners, care about this issue.

- Failing to be proactive will place our companies on multiple defensive fronts driven by policymakers in dozens of states, which will cost our companies hundreds of millions of dollars.
- Failing to set our own agenda means defaulting to the European RoHS directive, which is overly complex and—due to its inflexibility—may lead to substitute components with inferior performance in some products.
- Legislative language in the future will address this issue with or without our industry's guidance. Let's make sure it's the former option.

We are very interested in NEMA member feedback on the subject. I would encourage all NEMA members to evaluate material substances in our own products, give consideration to how we can be proactive in setting the environmental stewardship agenda, and understand and evaluate NEMA proposals and their impact on our businesses. Your member representatives have already been contacted by NEMA staff regarding this initiative. Input from all NEMA companies is imperative to refining our strategy for the future.

Sir Francis Bacon once wrote, "He that will not apply new remedies must expect new evils; for time is the great innovator." While Sir Francis wasn't thinking of us when he penned that insightful line in the early 17th century, it certainly appears relevant to the challenges we face today. 



National Electrical Manufacturers Association
1300 North 17th Street, Suite 1752, Rosslyn, Virginia 22209

Contact: Mark Kohorst, (703) 841-3249, mar_kohorst@nema.org