



RESEARCH & ADVOCACY BRIEF

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Walden Weighs in: Supporting the Toxics Release Inventory

The following relays the comments Walden submitted to the EPA as it considered decreasing the breadth and frequency of required reporting to its Toxic Release Inventory Database.

Re: EPA Docket ID Number TRI-2005-0073

Walden Asset Management (Walden), a division of Boston Trust & Investment Management Company, is an investment manager with over \$1.4 billion in assets under management. Our clients believe that those companies with commitments to customers, employees, communities and the natural environment serve both society and their shareholders well. Along with our clients and as a fiduciary, Walden believes that environmental performance is an essential component of our assessment of investment risk and opportunity. As part of our investment research process, Walden analyzes the environmental impact of existing and potential portfolio companies using Toxics Release Inventory (TRI) data and other Environmental Protection Agency (EPA) and third party sources. We write today to urge EPA to drop its current proposal, EPA Docket ID No. TRI-2005-0073, which would weaken significantly this important information source.

We understand that, in September, EPA proposed significant cutbacks in the TRI, reducing the reporting frequency from an annual to bi-annual requirement and decreasing thresholds that trigger detailed toxin or facility reporting. We believe that the proposed rule significantly weakens TRI data collection and disclosure, and unnecessarily diminishes corporate accountability of firms that release TRI chemicals. The long-standing and overwhelmingly positive benefits of EPA's TRI program far outweigh any cost savings associated with the proposed changes.

As an investment manager that seeks to understand the environmental impact and performance of existing and potential portfolio companies, Walden makes regular use of TRI data. To our knowledge, there is no other accessible information source that tracks the range of toxic chemicals that are covered under TRI. Aggregating facility information to

the holding company level, Walden evaluates company trends over time as well as company performance relative to peers. In this process, we have observed that companies' progress is often uneven, showing significant shifts from year-to-year. Walden believes that the changes proposed by EPA would impair substantially our ability to deliver on our commitment to clients to evaluate and monitor toxic releases as a key component of overall environmental analysis. Moreover, TRI data analysis has provided a meaningful basis for Walden to engage collaboratively with companies on avenues to improve their environmental performance.

TRI is widely credited for helping reduce toxic pollution by, in part, providing communities, legislators, regulators, investors and others with a powerful tool to hold companies accountable for their toxic emissions. The measuring and monitoring systems are in place, and the public at large is making good use of TRI information. Indeed, we are perplexed with EPA's proposal to curtail its "Right-to-Know" commitment that has proven to be so successful and we would encourage instead that EPA *expand* coverage of dangerous pollutants.

EPA extols the value of the Toxics Release Inventory, as expressed by Acting EPA Administrator Linda Fisher in the June 30, 2003 *Environmental News* release, "The Toxics Release Inventory is one of the most important activities EPA completes each year. It is a tool that gives the American public information on chemical releases for their communities so that they can make informed decisions about protecting their environment." Walden agrees with this sentiment.

We therefore appeal to EPA to rescind its proposal for cutbacks in the TRI program.

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