



Parent Company Information Toxics Release Inventory (TRI)

May 17, 2011



TRI Parent Company Data

- Background
- Consistency
- Accuracy
- Continuous Improvement of Corporate Data





Background

Parent Company is defined for TRI Program as:

- Highest level U.S. company that directly owns at least 50% of the voting stock of the company
- If owned by a foreign entity, facilities instructed to enter NA (not applicable)
- Owner as of December 31 of the reporting year



Background

- EPA uses parent company data in
 - Small business analyses
 - Enforcement and compliance cases
- Facilities required to report parent company data since inception of TRI Program
- In last several years, interest in corporate information expressed by financial, NGOs, environmental, and academic organizations



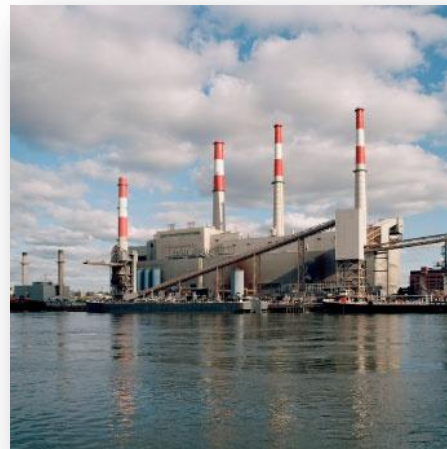


Background

- In 2008, EPA participated in a dialogue with financial sector representatives on how to make EPA data easier to use
- A consistent message from the dialogue is that EPA's facility-level data can be difficult to aggregate to the company level
 - Data may not be consistent
 - Date may not be accurate

Consistency

- Facilities often submit names with small variations
 - The Dow Chemical Company vs. Dow Chemical Co
 - JR Simplot vs. J R Simplot





Consistency

- Submitted Parent Name (2008) # of Facilities

G.E. CO	1
GE CO	35
GE CO.	79
GE, CO.	1
GENERAL ELECTRIC	1
GENERAL ELECTRIC CO	21
GENERAL ELECTRIC COR	1
NA	1
- Standardized Parent Names (2008) # of Facilities

GENERAL ELECTRIC CO (GE CO)	140
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Consistency - 'Standardization' Rules Help to Eliminate Variability

- Eliminate All Periods and Commas
- Use all CAPITALS
- Replace commonly used acronyms and abbreviations such as:
 - Replace AND with **&**
 - Replace LIMITED with **LTD**
 - Replace CORPORATION with **CORP**
 - Replace ASSOCIATION with **ASSOC**
 - Replace LIMITED LIABILITY COMPANY with **LLC**
 - Replace COMPANY with **CO**
 - Replace LIMITED LIABILITY CO. with **LLC**



Consistency - 'Standardization' Rules Help to Eliminate Variability

- Corporate initials (Zurn Industries PLC vs Zurn Industries)
- Misspellings (Taiheiyo Cement vs Taihieyo Cement)
- Hyphenation (Trans-Matic vs TransMatic)
- Spacing (JR Simplot vs J R Simplot)
- Finally, companies involved in mergers and acquisitions are updated so the Parent Company list only includes the US domestic parent company.

- Accuracy
 - Facilities submit subsidiaries, divisions or trade names instead of ultimate US Parent Company
 - Facilities often submit 'Not Applicable' (NA) when there is a higher Parent Company





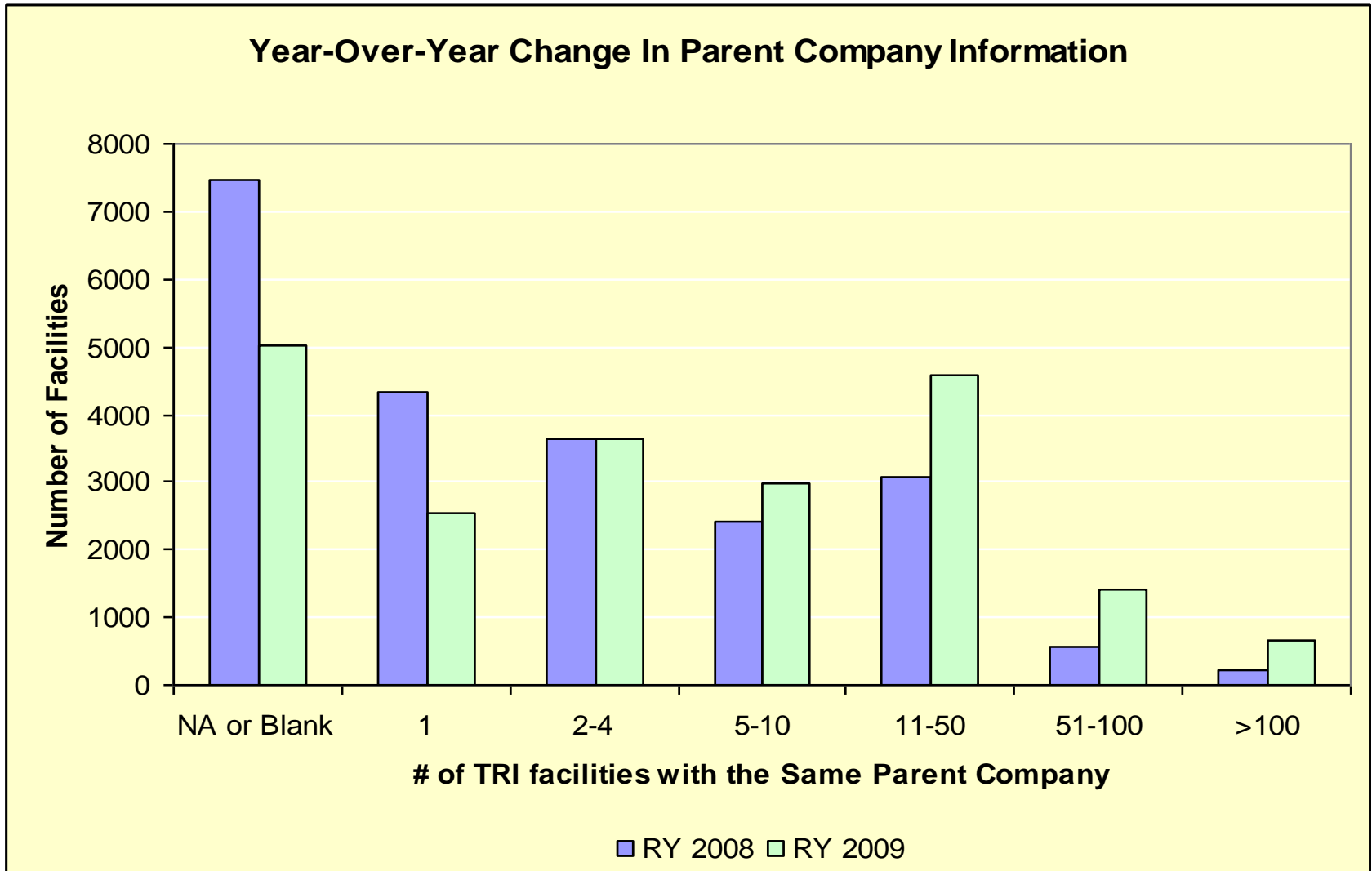
Accuracy

EPA is taking steps to improve accuracy:

- Starting with 2008, EPA performed annual research of Parent Company names
 - SEC 10-K Filings for Publicly Owned Facilities
 - Other publicly available information
- Researched, 'standardized' Parent Names inserted into TRI-MEweb reporting software
- Facilities still have the ability to 'override' EPA suggested Parent name



TRI Parent Company – Comparison of 2008 vs. 2009

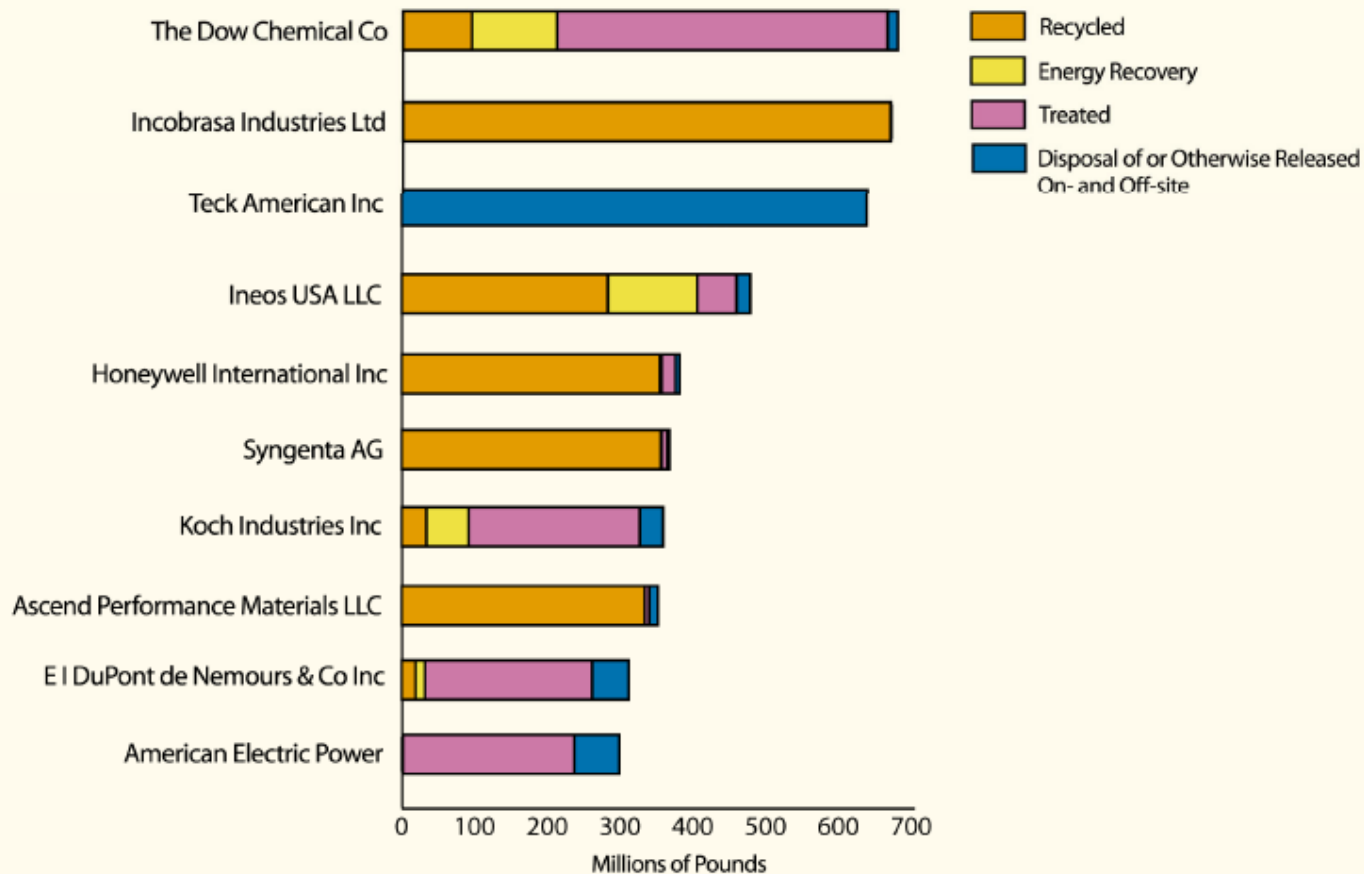




TRI Parent Company Data – Wrap-up

- Section on Parent Companies was included in TRI National Analysis for Reporting Year 2009
- EPA is considering a change to TRI forms to help ensure that the Parent Company reported for TRI reporting purposes is correct (or is the highest level U.S. company)
- Coordinating the approach with EPA's Facility Registry System (FRS) for broader Parent Company consistency and accuracy

Figure 30. Production-Related Waste Managed by Top 10 TRI Parent Companies, 2009*



* For Reporting Year 2009, EPA placed an added emphasis on the importance of improved data quality for parent company names. These rankings reflect the parent company information provided by facilities in Reporting Year 2009 and have not been independently verified. There was one facility, Incobrasa Industries Ltd, with a comparable quantity of production-related waste managed that does not have a parent company; it is also included.



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