

**The 33/50 Program:  
Industry's Response to Voluntary Environmental Regulation**

by

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## ABSTRACT

In February 1991, the U.S Environmental Protection Agency (EPA) announced its new 33/50 Program, a pollution prevention initiative that seeks voluntary waste reduction commitments from some of America's largest polluters. The EPA identified 17 "high priority" chemicals from the Toxic Release Inventory (TRI), and challenged industry to reduce their annual multimedia output of these wastes 50 percent by 1995, preferably using pollution prevention practices. The 33/50 Program is illustrative of recent changes taking place in national environmental policy; the emphasis on pollution prevention rather than pollution control as the preferred method of waste management, and a growing reliance on the private sector to achieve environmental goals.

This thesis examines industry's response to the 33/50 Program. A database containing descriptive information about the 6000 companies asked to participate in the 33/50 Program is the primary source of quantitative information, while anecdotal evidence was obtained from interviews with corporate representatives. Several factors expected to influence 33/50 participation were evaluated for correlation, including company size, corporate TRI release trend, financial climate, and regulatory environment. Participation in the 33/50 Program has been highest among the largest generators of 33/50 wastes, whereas smaller firms are less supportive of the Program. This study has determined that company size is the most crucial determinant of 33/50 participation, whereas the other factors expected to influence 33/50 participation appear to have little or no impact on the corporate decision to participate.

Although 833 firms have signed on to the 33/50 Program, the effectiveness of the 33/50 Program as environmental policy is a subject of some debate among industry, government and environmental advocates. The impact of the 33/50 program on environmental releases of 33/50 chemicals is evaluated in this thesis. In terms of multimedia releases of 33/50 chemicals, the EPA's estimates of the 33/50 Program's success could be considered optimistic, or even exaggerated. As a program designed to encourage pollution prevention, the 33/50 Program's impact is difficult to evaluate due to the limitations of the TRI reporting scheme and the inadequate administrative requirements of 33/50 participation.