



Citizen Suits, Enforcement, and NGO Engagement

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How Plastic is Made



Extraction:
drilling, fracking or
acidizing produce
NATURAL GAS



Fractionation:
natural gas
components are
separated,
producing
ETHANE

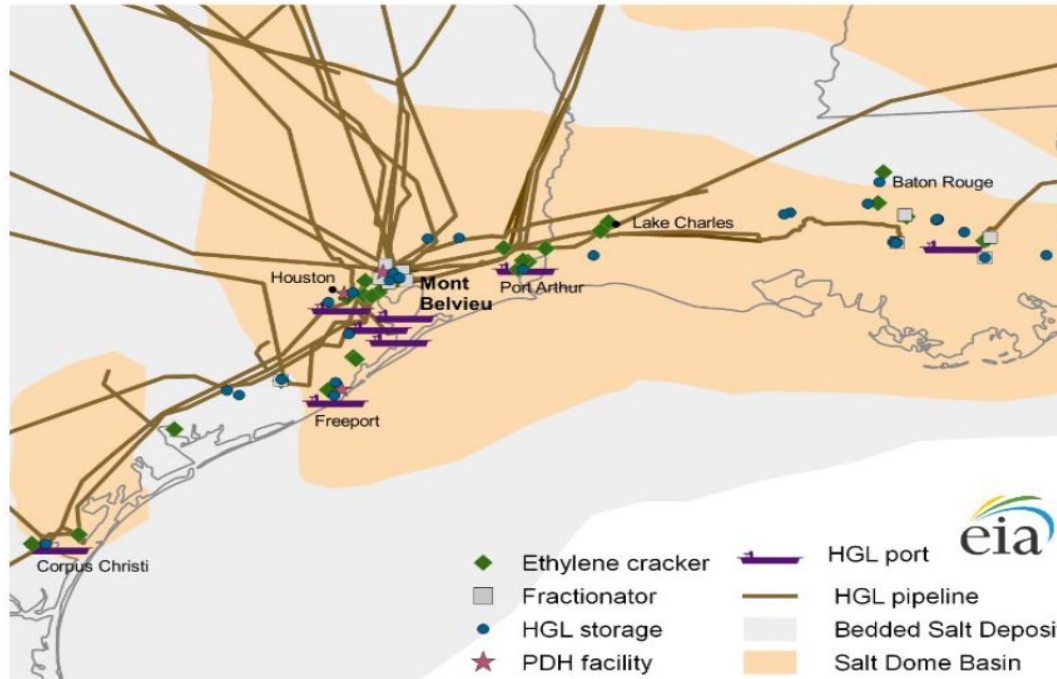


Cracking:
ethane is processed
in a cracker facility,
producing
ETHYLENE



Polymerization:
ethylene is
converted into
POLYETHYLENE
(plastic)

Where is Plastic Made?



Mont Belvieu
underground s

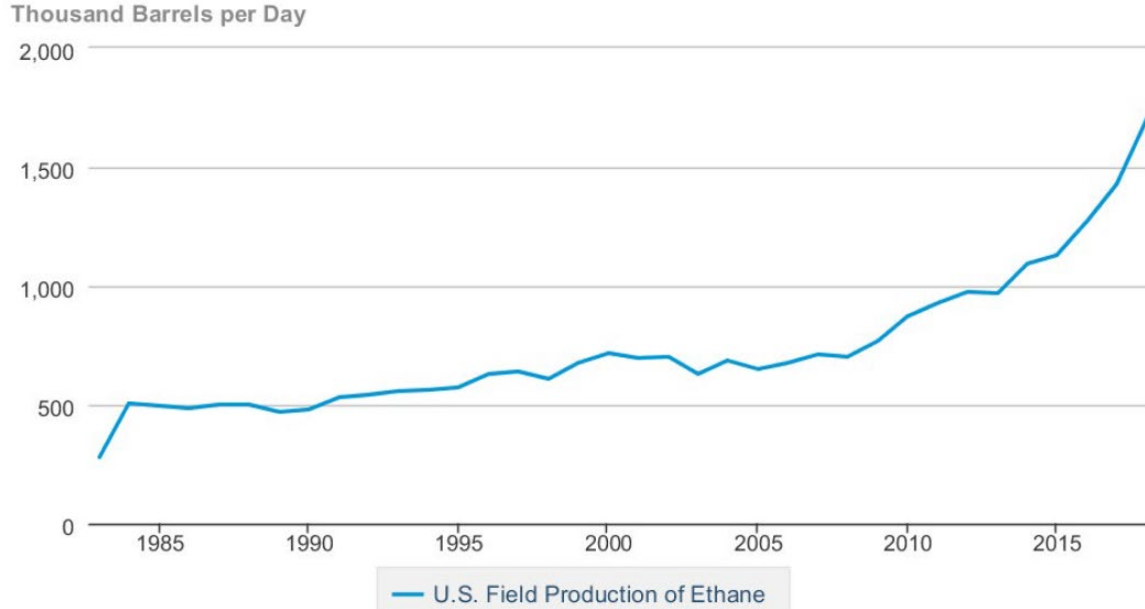
partment of Energy, November 2018.

Graphic Source:
*Plastics Pollution
on the Rise,*
Environmental
Integrity Project,
September 5 2019

Why ENGOs Are Concerned

ENGO: Environmental Non-Governmental Organization

Figure 1: Ethane Production in the United States, 1983 – 2018



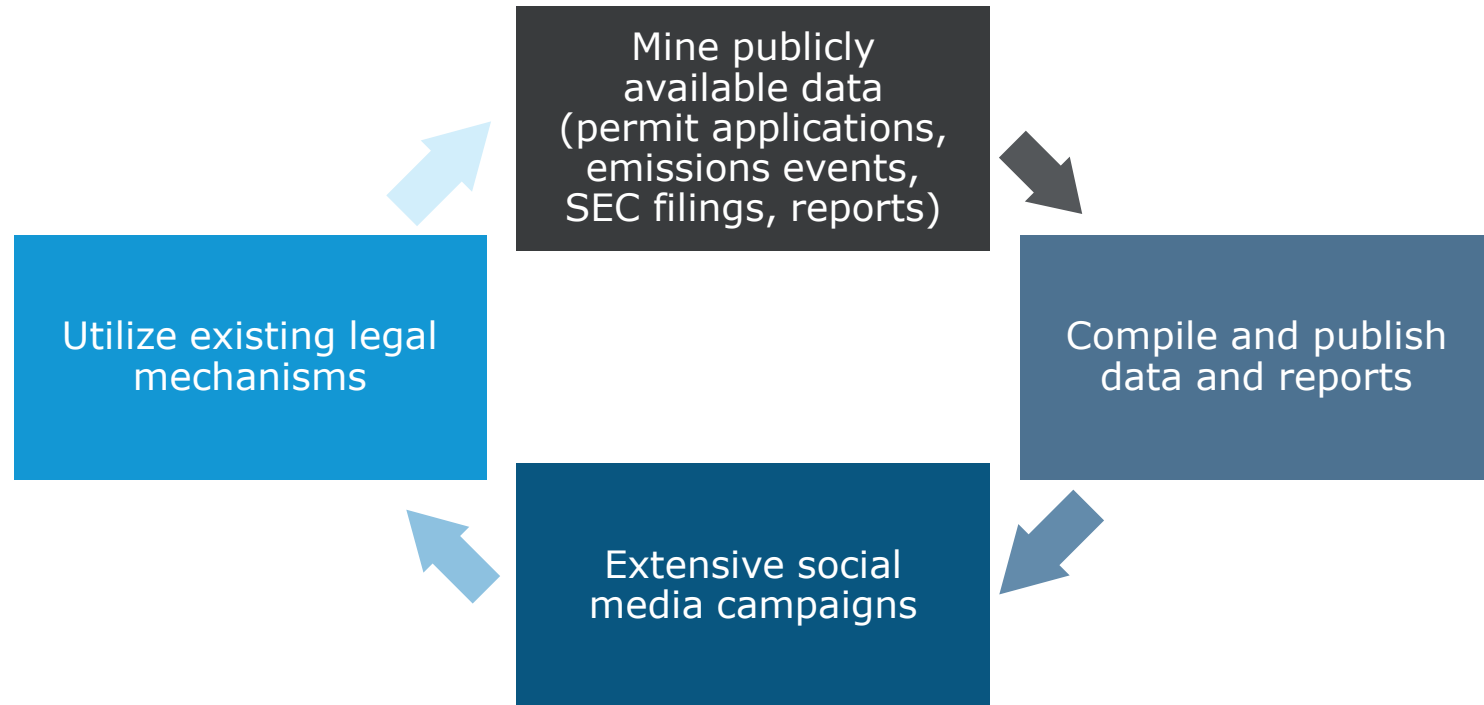
U.S. ethane production has more than doubled in the past decade. Source: U.S. Energy Information Administration.

Table source:
Plastics Pollution on the Rise,
Environmental
Integrity Project,
September 5 2019

“The Center is fighting the expansion of plastic ethane crackers through grassroots resistance and legal action. Our national campaign aims to halt the plastic boom at its source.”

- The Center for Biological Diversity

The ENGO Playbook



Existing Legal Mechanisms



Petition for and comment on new rulemakings



Object to permits for expansions



Citizen suits to penalize and correct alleged violations



Class actions (EO)

Government Enforcement

EPA

- EO Initiative
- EMACT RTR
- RMP
Investigations
Post-Emissions
Event of EO

State Activity

- Legislation
proposed
legislation
- Enforcement

Key Take-Aways

Multiple pressure points for companies to change re plastics

Internal organization and coordination is key

Opportunities?
Lemonade out of lemons?

Panel Discussion and Q&A



Thank You



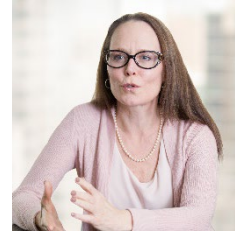
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