



***Parent Company
Information in TRI***

April 11, 2012

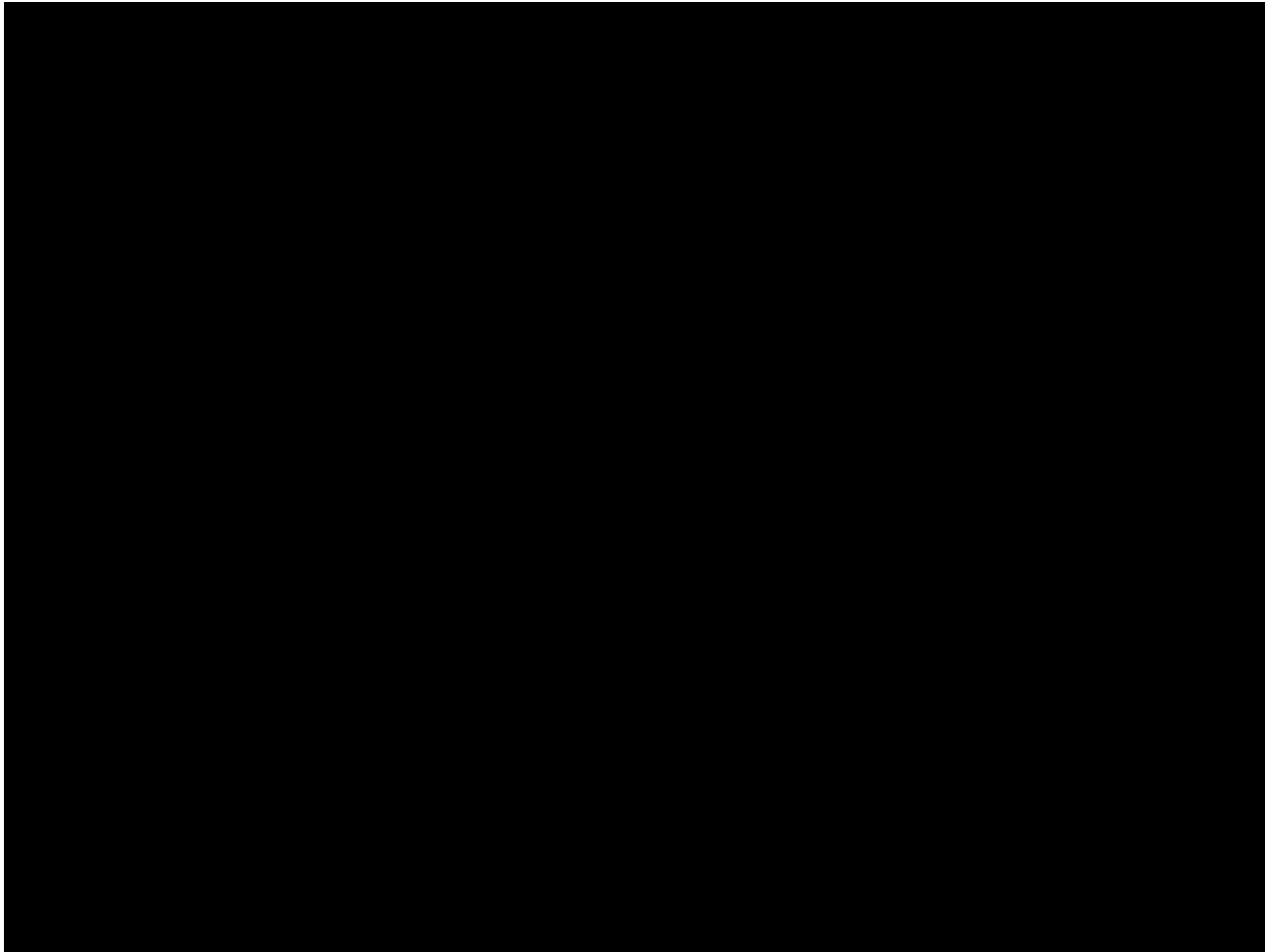


Background on the Project



- EPA uses Parent Company data in:
 - Small Business Analyses for Rulemakings
 - Enforcement and Compliance
- In 2008, EPA began a dialogue with the financial sector to make EPA data easier to use
- A Lesson from the dialogue is that EPA's facility level data can be difficult to aggregate to the company level
 - Data may not be consistent
 - Data may not be accurate
- EPA wants to improve the parent information to help their internal analyses and other end users

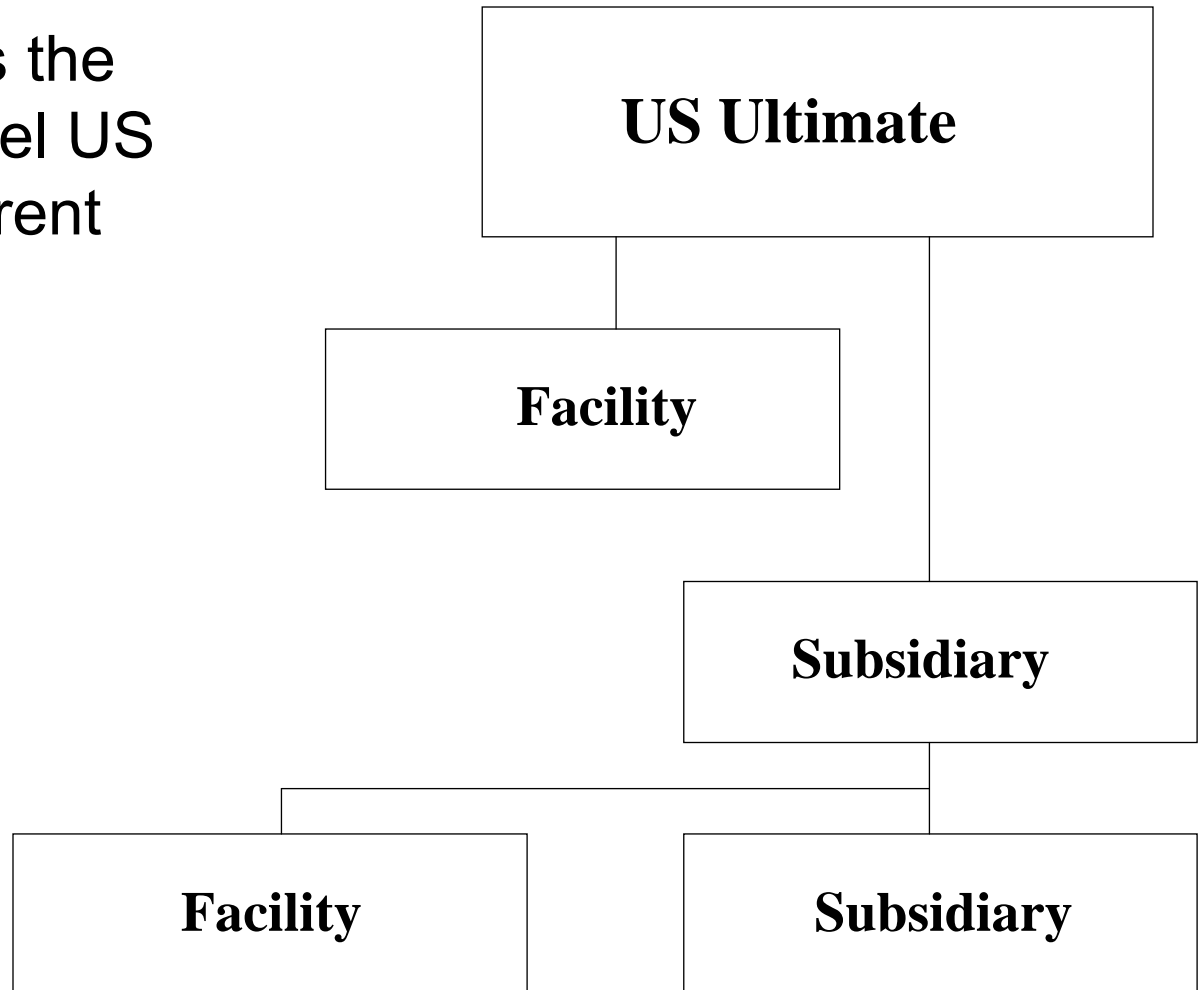
What is a Corporate Parent?



What is a Corporate Parent



- TRI Collects the Highest Level US Ultimate Parent Company



Consistency and Accuracy



- Consistency

- Filers often Submit Names with Small Variations
 - GE vs. G.E. vs. General Electric
 - The Dow Chemical Company vs. Dow Chemical Company
 - JR Simplot vs. J R Simplot
 - Taiheiyo Cement vs. Taihieyo Cement

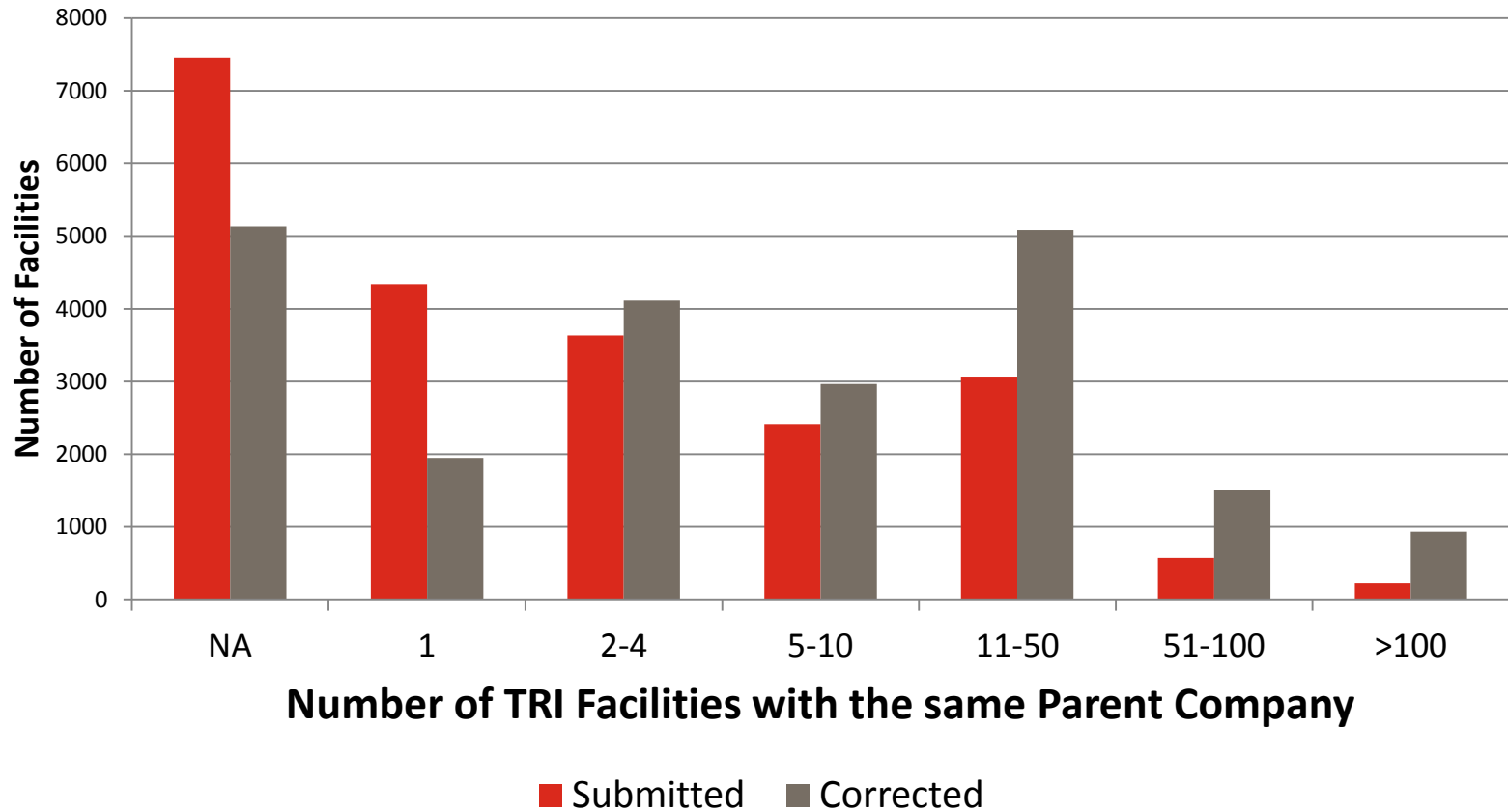
- Accuracy

- Filers Submit Subsidiaries, Divisions, or Trade Names Instead of the Ultimate US Parent Company
- Filers Submit “Not Applicable” when there is a Higher Parent Company

2008 Parent Company Information



2008 TRI Facilities Per Parent Company



So... What does EPA do about it?

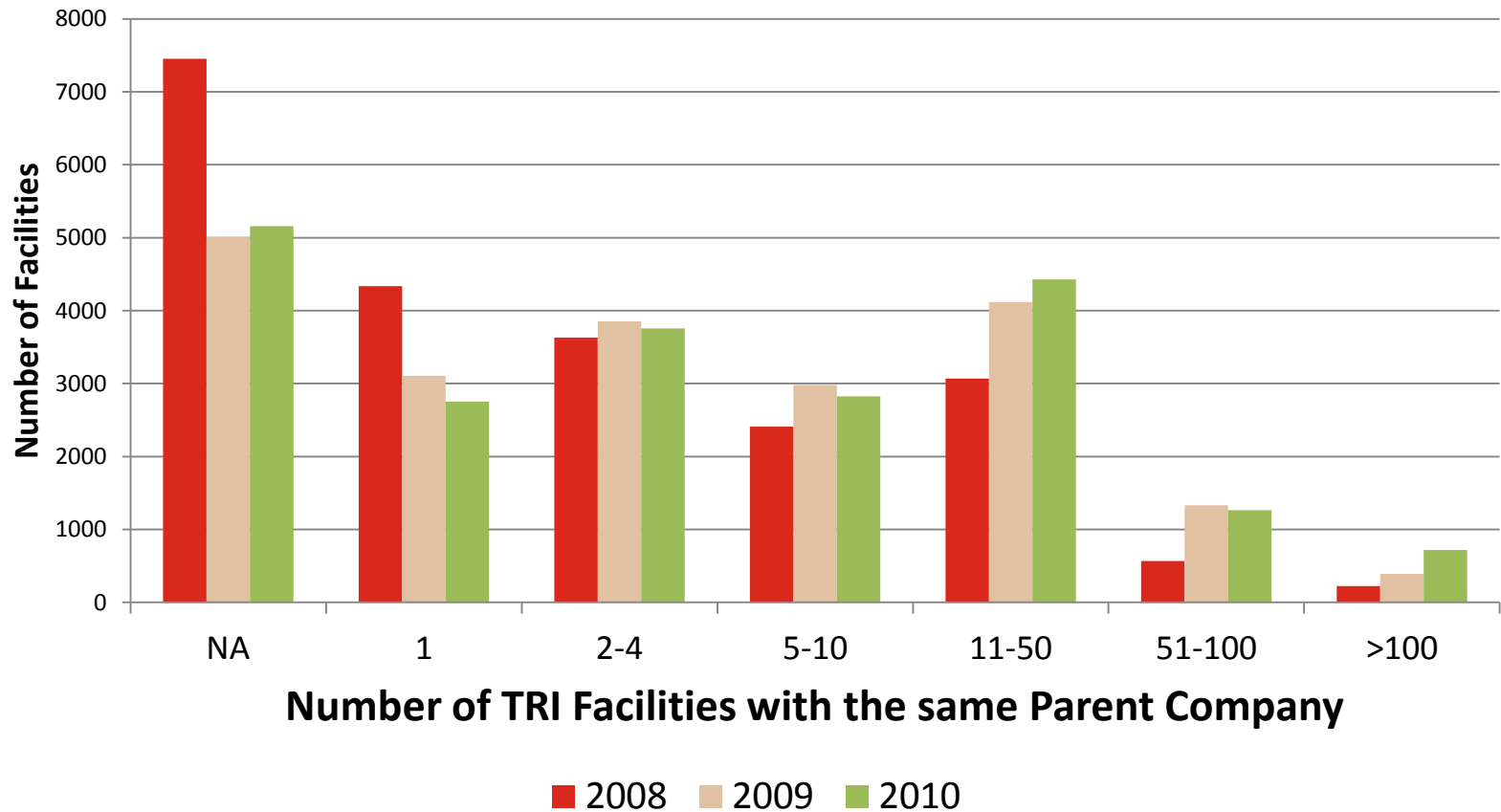


- First, EPA improves the data
 - Consistency is improved by looking at the data and standardizing the names
 - Accuracy is harder and requires research
 - SEC 10-K filings for public firms
 - Internet research for private firms
- Then, EPA inserts the improved data into TRI-MEWeb for facility review

Results over 3 Years



TRI Facilities Per Parent Company



Next Steps and Final Thoughts



■ Next Steps

- Review and improve RY2010 data for RY2011 submissions.
- Improve the parent information prompts in TRI-MEWeb.
- Look at Greenhouse Gas submissions to ensure facilities reporting to both are reporting the same parent company.

■ Final Thoughts

- The process of improving parent company information is iterative.
- EPA is making progress.
- Please share how you use the data and what can be done to improve it.

Alex_Klaessig@Abtassoc.com

617-520-2589



BOLD
THINKERS
DRIVING
REAL-WORLD
IMPACT

