

***A Call to Action to Build a
Performance-Based Environmental
Management System***

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Management System***

Series on the
Environment In the 21st Century


THE ASPEN INSTITUTE

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Foreword

Convened by the Aspen Institute's Program on Energy, the Environment, and the Economy, participants met in Aspen, Colorado, in September 1999, for a dialogue on the progress of environmental performance in the U.S., in order to suggest systemic improvements. This *Call To Action to Build a Performance-Based Environmental Management System* is an outcome of their dialogue.

Participants were from small businesses, corporations, federal and state governments, and environmental and other non-governmental organizations. In order to offer an alternative framework for moving forward on environmental performance, participants met over a period of three days and sought to leverage the successful outcomes of prior Aspen collaborations as well as activities nationwide that have occurred particularly in the last five years. This report, therefore, touches upon several aspects of the topic of environmental performance, draws upon and confirms recent work in the field, but does not purport to be comprehensive. Rather, it offers an alternative framework for moving forward using what we have learned from this prior work to achieve the goals of stronger environmental protection at lower cost and with faster, simpler implementation.

In previous dialogues among diverse stakeholders, the Aspen Series on the Environment in the 21st Century has identified values shared in common among the private, public, and NGO sector participants, such as the ethic and practice of individual and business steward-

ship. These values paved the way for recommendations regarding superior environmental performance and its strategic business value, aligning economic signals with natural resource goals, resource productivity, community involvement, environmental literacy, holistic natural resource and integrated systems management, design for the environment, and more. These recommendations have been published in a series of reports, *The Alternative Path, A Cleaner, Cheaper Way to Enhance the Environment* (1996); *Uncovering Value: Integrating Environmental and Financial Performance* (1998); and *The Stewardship Path to Sustainable Natural Systems* (1999).

The Program on Energy, the Environment, and the Economy acknowledges and thanks our participants for their commitment to civil dialogue and to improving environmental performance. We thank also the U.S. Environmental Protection Agency and our business participants for their financial support of this dialogue.

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Note:

A Call to Action to Build A Performance-Based Environmental Management System is issued on the authority of The Aspen Institute and its Program on Energy, the Environment, and the Economy. It reflects the collective views of the diverse participants in the dialogue and the agreements they reached over three days and, as such, reflects numerous consolidations and compromises. No individual should be presumed to endorse every word; nor should the participation of individuals imply the endorsement of their organizations.

Introduction

The U.S. system for environmental protection was embodied in media-specific statutes in the 1970s. These federal statutes emphasized pollution abatement and control, designed to fit the prevailing environmental conditions at the time. In addition, they provided tools which are generally characterized as regulation and enforcement. These tools have been used successfully over the past 30 years to obtain major measurable reductions of pollution loadings to our air, water, and land.

The result is that existing environmental statutes and regulatory requirements focus on compliance with standards or require use of best available control technology. While this approach emphasizes conformance with legal imperatives, it does not sufficiently encourage efficiency, innovation, or continuous improvement. In addition, it does not provide adequate information on actual environmental performance, conditions, or outcomes. The result is a system that delivered major accomplishments in the past, but is unable to respond to today's challenges and opportunities as well as it should—it does not deliver and often inhibits continuously improving environmental performance.

Improvements could be gained with a system that achieves more than the limited objective of compliance, readily yields positive environmental outcomes or gains, encourages innovation, provides flexibility, readily accommodates public desire for disclosure and trans-

parency, is less costly and litigious, and is more consistent with current business practices.

Most observers agree, therefore, that the current system needs to be modernized, reformed, and improved. Participants in this Aspen Series believe that we can and should test a system to motivate and achieve much higher levels of environmental performance. Our goal is to build a system that emphasizes pollution prevention, product stewardship, resource efficiency, and sustainable enterprise, and builds on the work on environmental management systems. The Aspen participants also believe that this must be done without compromising the baseline environmental protection provided by the current regulatory system and without allowing regress on the positive environmental results attained by compliance.

While there is a growing body of discrete pilots and models, a new performance oriented system must be developed and become operational to motivate continuous innovation and superior environmental performance among businesses. A performance-based system should offer:

- environmental performance standards or goals—to improve over the baseline;
- dissemination of performance data to the public—to assure verification;
- enhanced stakeholder involvement—to, among others, facilitate building trust;
- continuous improvement—to achieve better environmental outcomes;
- environmentally sustainable practices—to increase resource productivity; and
- operational flexibility—to implement adaptive environmental management, to improve alignment of financial and environmental goals, and meet goals.

The design of a performance-based system should be informed by extensive research on and demonstrations of environmental management systems (EMSs), emphasizing elements such as pollution prevention (P2), clean production, and design for the environment (DfE).

The two tracks outlined here as part of a performance-based system are based on a growing body of work and experimentation and have been developed as a next step to improve performance. In addition, the two tracks should be built and operated concurrent with the existing environmental management system. The sources for recommending this approach are numerous, including the Aspen Series' Alternative and Stewardship Paths, the Enterprise for Environment report, both President's Council on Sustainable Development reports, EPA's Innovations Task Force recommendations, and other reports describing a "greentrack" or "two-tiered" system similar to EPA Region One's "Star Track" program. All of these reports explain the need for innovation, and all of them suggest elements or conditions that would be necessary for a performance-based system. The need now is an approach to implementation through a coherent program.

The Aspen Aspirational Vision:

Economically Superlative,
Environmentally Sustainable Enterprise

The performance-based system is meant to anticipate a new environmental management framework that fosters sustainable enterprise. It recognizes that the environment can be significantly better off, and that participating companies are also better off. To demonstrate this aspirational vision of the future, we identify four pillars of sustainable enterprise and offer some examples under each:

Policy Principles:

Subscribing to Global Business Norms:

e.g. GEMI, CERES, The Natural Step

Business Imperative:

Competing in a Global Market:

- Corporate ethic and practice of stewardship
- Design for the environment (prevention)
- Materials accounting
- Full cost accounting
- Life-cycle accounting
- Extended product responsibility
- Increased resource productivity (eco-efficiency)

Public Imperative:

Serving the Public Interest

- Transparency, disclosure
- Stakeholder involvement
- Environmental and social justice
- Occupational health and safety
- Responsibility to community

Economic Imperative:

Using Economic Instruments

- Trading regimes
- Alignment of Prices
- Cost-effectiveness
- Market mechanisms

Build the System

There is urgency to act now because innovation is needed and critical windows of opportunity are open. First, the U.S. EPA has recently proposed a performance track, and some state governments and international entities have piloted a variety of performance track approaches. Second, rapid restructuring in the domestic and global economies is causing companies to change their operations, their products, and their corporate and financial configuration as a matter of course. Third, sufficient groundwork and test cases have been established to provide a basis from which to draw elements needed for an environmental performance system to become operational. Finally, the next system needs to be more consistent with developments worldwide and align with the vision of sustainable enterprise.

Responding to these and other demands, our intention was *not* to build a blueprint or a full set of specifications. Rather, our intention was to draw from this body of work and identify the core elements, the next steps needed, to get a nationwide, federally oriented performance system into action. In this effort to generate programmatic strategies and action, we also defined some of the conditions necessary to make the performance system compelling. We caution, however, that considerable work remains to design the specific operational attributes of each track.

Initiating the design of the performance-based system, the Aspen group devised two related but distinct performance tracks:

Track A. The Leading Performance Track

The intent of this track is to improve environmental performance and to provide leading companies the opportunity to choose their own approach to making significant improvements in performance that help achieve environmental goals. Performance-based standards would be set to obtain environmental outcomes superior to outcomes anticipated from current applicable regulatory requirements. This track would hold in abeyance certain existing environmental regulatory requirements while substituting them with a series of environmental performance-based standards for releases, emissions, transfers, and discharges. This approach relies on robust environmental management systems, public disclosure of performance data, enforceability, continuous improvement, third party auditing or certification, and other criteria.

Track B. The Incremental Performance Track

The intent of this track is to improve environmental performance and to encourage increasing performance of companies within the current compliance framework. This approach is similar to several existing reinvention or compliance-based programs such as Project XL, Oregon's Green Permits, and Star Track, in that it allows for some flexibility while the balance of the existing environmental regulations remain in effect. The degree of flexibility would ramp up in direct proportion to better performance and greater accountability. This approach relies on many of the same performance elements as Track A.

Track A represents a bold vision, and perhaps the ultimate goal of environmental performance and reinvention. As difficult as it will

be to implement programmatically, aspects of Track A should be designed and tested to gain experience and build a constituency. Some companies are already pursuing Track A and may be ready to demonstrate their capacity given the creation of a more certain and appropriate performance assurance system.

For other companies, especially small and medium-sized enterprises (SMEs), Track A standards and criteria may be, at present, too ambitious, costly, or uncertain. Track B is intended to provide an option for incremental changes in both performance and regulation, allowing increasing levels of flexibility based on a company's compliance record, better environmental results, and enhanced accountability. It also provides the means for firms to graduate or evolve into Track A.

Some of the core elements in Track A and Track B are similar. Both are meant to provide a path for drawing firms into better environmental performance, upon which many believe the long-term environmental and economic health of the nation depends. The two models have much in common in terms of goals—the focus on stewardship, pollution prevention, environmental management systems, life cycle analysis, design for the environment—and the means of getting there. While approaches similar to Track A are in place in countries such as the Netherlands and New Zealand, Track A is an unapplied approach in the U.S. that will require some work to realize, whereas Track B is reflected in many existing experimental forms that use elements of the current compliance framework for evolutionary change.

These two tracks, while sharing similar attributes, encompass different purposes, have different access points, and serve different performers (Table 1). Not everyone can or will be ready to take advantage of a leading track (A), just as leading companies will not want to graduate through the ranks of the incremental track (B). We believe that many enterprises will want to enter the leading Track as soon as it becomes feasible to do so. By offering two performance-based tracks, it becomes possible for an ever increasing number of firms to participate according to their different

needs and abilities to perform, and we believe this approach offers synergistic value to reinvention efforts. Of course, any regulated entity that does not choose to participate in either track remains subject to the applicable federal or state regulations of the existing environmental management system.

TABLE 1

Characteristic	Leading Performance Track A	Incremental Performance Track B
General description	Entirely new system designed on basis of desired outcomes. Key criterion includes where we want to be, not where we are coming from. Built to take advantage of changes in technology, information management, EMS, etc. Stresses high efficiency yet should be designed to yield very high environmental performance.	Makes modifications (perhaps significant) to existing regulatory system with established, easily implemented parameters. Models representing different levels of modification can be designed and tested; what characterizes this approach is its use of the existing regulatory system as a point of departure, as with Project XL, Green Permits, or Startrack.
Key principles	Pollution prevention, environmental management systems (EMSs), better collection and use of data, auditing and certification, etc.	Pollution prevention, environmental management systems (EMSs), better collection and use of data, auditing and certification, etc.
Participating companies	Likely large companies with existing history of strong environmental management, mature EMSs, supply chain management, Design for Environment, etc.	Variable, but base would likely be those with good compliance records, good efforts and good competencies. Clusters of Small & Medium-sized Enterprises (SMEs) should be considered in “covenant” approaches.
Time frame for implementation	A demonstration design effort through the federal system would likely take 1-2 years.	Could be implemented quickly on limited basis using existing state and federal efforts in this area.
Risk level	Theoretically higher, but could also be designed to provide commensurately higher returns—very high levels of environmental performance.	Incremental—the more changes to the existing system, the greater hypothetical potential for default to “noncompliance.”

While there is growing agreement on the common goals and the basic design of performance-based tracks, many details of how they will be accomplished remain to be worked out. To begin, we are aware of five possible implementation frameworks (i.e., levels) to make the environmental performance tracks operational:

- through continued free-form and largely voluntary innovation,
- by acting within a policy construct and with a policy directive, like Project XL,
- acting through changes in the regulations,
- by statutory mandate or legislative authority, or
- all four of the above.

We recommend action on each level to contribute to the convergence of ideas and increase experience and innovation in a performance-based environmental management system.

The Leading Performance Track—Track A

The leading performance track would hold in abeyance certain administrative and regulatory requirements while substituting new performance requirements based on environmental standards and the strategic use of environmental management systems (EMS)-*plus*. (While each EMS is designed by a particular business to best meet its own management needs, the *plus* indicates that business's commitment to address other environmental protection aspects that meet public policy goals of an alternative regulatory track.) Under specific conditions, Track A would allow certain regulatory requirements to be replaced by challenging performance based requirements so that firms can determine their own best approach for meeting environmental goals. A first step would be to develop environmental criteria for these challenging performance based requirements. The leading performance track is intended to harness the potential strength of strategic environmental management systems that combine economic efficiency, pollution pre-

vention, and life cycle analysis, and put emphasis on greater environmental performance results and accountability.

There is already a wealth of data and knowledge that could inform practical efforts to implement the leading performance track. As a starting point, a Track A could employ building blocks that have been demonstrated in Project XL and other pilot projects. The EPA must participate in further developing such building blocks through evaluating and sharing other models of EMS-plus that include environmental standards and goals, standardized core data, third-party verification, and other elements. Track A must be a system that incorporates experience and is continuously improving.

The characteristics of the leading performance Track are as follows:

1. Holds in abeyance certain regulatory requirements which are substituted with a new set of environmental performance standards. This will require identification of the specific regulatory requirements which might be held in abeyance, while developing and testing new performance-based standards. In the event that the environmental performance standards or environmental improvement commitments are not met over a stated period of time, the participating business would be directed to return to operating under existing statutory and regulatory requirements.
2. Requires full transparency, public disclosure and reporting of understandable, accessible, and verifiable environmental performance information on:
 - accomplishment of environmental performance measures above a baseline condition,
 - achievement of environmental outcomes or results and ambient standards,
 - appropriate internal and external auditing information, and
 - materials and energy flows.

3. Is goal oriented toward pollution prevention and continuous improvements including advancing innovation and new technologies.
4. Provides flexibility to companies in both approaches and schedules in meeting environmental goals within a predetermined time framework.
5. Employs robust environmental management systems-plus and third-party auditing and certification of EMS systems and performance results, including compliance with any applicable requirements that are not in abeyance.
6. Utilizes accounting features such as full cost accounting and life cycle analysis.
7. Provides regulatory certainty through a legal or regulatory instrument (e.g. integrated permit).
8. Expands the use of performance based markets and trading regimes (e.g. Title IV SO₂ trading system).

Track A requires an understanding and acceptance of certain new roles. The company role includes training and guidance in implementing the new performance system for environmental managers and company officials. The public role is one of enhanced community responsibility, input, and participation. The Agency's role and responsibilities become:

- setting environmental standards and goals,
- establishing new regulatory relationships with states and third parties,
- enforcing environmental performance standards,
- monitoring agreed-upon obligations of participating parties,
- collecting and disseminating information,
- providing environmental research, knowledge and technology transfer, and
- communicating to the public the vision of the future.

The criteria for qualifying to enter the leading performance Track are meant to encourage good companies to do better and superb companies to excel. Therefore, Track A is forward looking and relies on the commitment to meeting aggressive environmental performance standards based on the integrity and verifiability of a dependable environmental performance system. In return, participants in Track A will be assured flexibility in meeting environmental goals and in seeking mutually reinforcing environmental and financial performance. The ultimate goal is to offer access to Track A to anyone who has a demonstrated ability and capacity to successfully commit to aggressive environmental standards and management practices:

Criteria:

- open to all who can demonstrate ability and capacity for meeting commitments,
- no criminal convictions in 5 years (or not substantially out of compliance), and
- a strong corporate environmental health and safety policy.

Commitments:

- to environmental management system-plus and/or ISO-plus,
- to meet established environmental performance standards,
- to continuous significant improvement over a baseline (baselines can be determined, for instance, by taking a 3-year average out of 10 years of actual measurable releases or discharges, normalized against volume or on a per unit basis), and
- to public participation and disclosure of performance results.

It is necessary to develop and create a regulatory gateway through which organizations can apply for acceptance to the leading performance track, a gateway that explains the entrance requirements and incentives of the new track in advance, and which could include

partnering among companies and relevant government agencies. Whatever the route, organizations that meet certain participating requirements for “switching” from one set of system requirements to another need a clear and cost effective way of getting there. This adds certainty and confidence so that participating organizations know where they are going and what can be expected, and the relevant costs and benefits.

For example, Project XL criteria could be the starting point of access for companies seeking to enter the leading performance track--this is not to suggest that Track A is just another XL project or that all aspects of XL should be carried over into the new leading performance track. What we do suggest is that rather than negotiate individual final project agreements, a “boilerplate” final project agreement should be created in advance so that applicants can self-qualify based on meeting the conditions stated in advance. The agency would then review the applications for approval.

The Incremental Performance Track—Track B

The incremental performance track uses incremental means to make progress towards non-incremental ends. It shares with Track A the desire to put stewardship, clean production, continuous environmental improvement, sustainable enterprises, and related goals into operation while also minimizing the associated costs. Track B is based on the awareness that many companies lack concrete experience with these concepts and, therefore, the best way to connect them is to further experiment with more effective design and refinement of each element of environmental performance.

Track B shares many common elements with Track A , including:

- reliance on environmental management systems and a continuous improvement approach,
- meaningful incentives for better environmental performance that is significantly greater than required by existing laws and regulations,

- increased use of environmental performance metrics, and
- more meaningful stakeholder participation roles.

The incremental performance track, however, differs from the leading performance track in that it uses the existing regulatory system as its framework for experimentation. Track B encourages evolutionary change within a compliance framework. By so doing, it provides an option for some companies, including small and medium-sized enterprises (SMEs) that are not currently equipped to pursue Track A. Clusters of SMEs could be permitted to form or join groups to participate. The assumption is that as experience under Track B accumulates, the system will be incorporating learning to further design and implement aspects of Track A.

The cornerstone of Track B is the requirement for a company to have in place an effective environmental management system-plus. Like Track A, and many experimental programs currently in place, the plus components include a demonstration and verification of compliance by either the company or a third party, of performance beyond regulatory minimums, and meaningful stakeholder involvement. A critical component of stakeholder involvement must be more effective communication using meaningful performance metrics.

The incremental performance track is envisioned as a multi-tier program, each tier requiring a higher performance level, with accompanying increased incentives for better performance in the core elements. Because Track B operates within the current statutory/regulatory regime, the incentives it provides are of a regulatory nature. These incentives include simplification of permitting requirements, acceleration of and greater flexibility in permitting, and consolidation of reporting requirements and longer reporting cycles. Facilities still have to meet existing regulatory requirements, but the incentives will allow participating facilities to meet those requirements in a more streamlined and efficient way. Incentives are structured to motivate better environmental performance at higher tiers.

Track B will be standardized to the extent that it will not need to be custom designed for every participant. At the same time, regulators will need to exercise judgment about individual cases and therefore will require appropriate training.

Finally, as reinvention has shown, further changes will be needed in the resource distribution, organization, and culture of regulatory agencies to implement both Tracks A and B.

Next Steps

We acknowledge that considerable work must go into designing and implementing a performance-based system, including Tracks A and B. We also acknowledge that many attributes of Track B are currently being tested in reinvention programs such as Star Track and Project XL, as well as in some state projects. How do we advance building the system along both tracks? Three suggestions are offered below that also illustrate the interrelationship of the two tracks.

1. *Stand on the Pioneer's Shoulders:* To build Track A, we will need to define several critical elements. Some of these are tough questions, such as how to set performance-based standards and how to handle reporting, enforcement, and public involvement. Almost all of these aspects, however, are currently being tested somewhere in an active pilot project. Track B ensures that we will continue to enrich the data and experience we need to build Track A. It is also worthwhile to take stock of what we have already learned from pilot projects and assess what gaps are left.
2. *Build it and they will come:* By forging greater agreement on the ultimate vision in Track A and clearly articulating it to decision-makers, opinion leaders and other stakeholders, we begin to raise awareness and build understanding of this vision. We will also begin to build a multi-stakeholder constituency for both tracks adding impetus to the realization of each.

3. *Keep Plugging Away*: While we articulate the vision in Track A, we must continue to experiment with programs similar to Track B. We not only gain important knowledge from these experiments, but we start to move reinvention from the marginal status of today to a more mainstream approach. The EPA should begin to experiment with demonstration projects under Track A, and support continued experimentation under Track B.

A Call To Action:

We urge the EPA and Congress to articulate the vision in Track A and support both tracks by:

- offering significant funding for competitive grants to design and test several versions of Track A and Track B that feature the core elements discussed above,
- encouraging partnerships in system design and implementation among EPA regional offices, state, industry group(s) and NGO groups, and
- pursuing limited and targeted legislation to provide temporary authority to make Track A feasible and Track B easier.

Notes On Implementation

For the reasons stated above, Tracks A and B support one another and are in fact synergistic. They are two distinctly different approaches with the same goals. Track B starts with the existing system and seeks to transform it into a performance track. Track A redesigns the existing system by focusing on environmental performance outcomes. Both tracks can be designed to reach out to one another without unnecessarily hampering the other. And both tracks must recognize and honor existing pilot programs at the state level in order to create a larger base of experience and to enhance relationships between federal and state agencies.

It is important to re-emphasize that while pursuing important changes, it is incumbent that we uphold the integrity of the law and

maintain a level economic and competitive playing field. Existing safeguards and standards are intended to protect human health and the environment. Thus, the environmental protection baseline levels and goals created by existing laws and regulations must be achieved. Any environmental performance-based project, therefore, must demonstrate a verifiable baseline from which to measure improved performance.

Conclusion

The Aspen participants believe that we need stronger environmental protection at lower cost and with faster, simpler implementation. This report, not meant to be a specific implementation guidance document, instead offers an alternative framework for moving forward to achieve these goals using everything we have learned from previous environmental performance pilots and reinvention efforts—from here, we envision ways to codify a simpler, more effective environmental regulatory system. Our dialogue yielded two mutually reinforcing tracks that could operate in parallel to our current system. While we acknowledge that there are important and difficult policy decisions that remain to implement this performance-based system, we continue to explore better solutions to address our environmental needs, and offer this conceptual framework to advance this vision.

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