

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

STYRENE INFORMATION AND RESEARCH CENTER, *et al.*)
)
)
Plaintiffs,)
)
v.)
)
KATHLEEN SEBELIUS, *et al.*)
)
Defendants.)
)
)

Civil Action No. 1:11-cv-01079-RBW

DECLARATION OF JOHN O. SNYDER

I, John O. Snyder, declare as follows:

1. I am Executive Director for the Styrene Information and Research Center (“SIRC”). I have served in that capacity since January 1, 2002. SIRC is a non-profit organization consisting of voting member companies involved in the manufacturing or processing of styrene, and associate member companies that fabricate styrene-based products. Collectively, SIRC’s membership represents approximately 95% of the North American styrene industry. SIRC serves as a liaison between industry, federal and state governments, and international agencies on health-related issues involving styrene. My responsibilities include general management and oversight of all the association’s activities, which includes the execution of contracts with consultants and service providers to SIRC.
2. I have personal knowledge of the following facts and, if called, could and would competently testify to their truth.
3. In 2004, SIRC commissioned Global Insight, Inc., and Nexant, Inc., to independently research and prepare a report that quantified the value of styrene to consumers.

That report, entitled “The Economic Benefits of Styrenics to the U.S. Economy,” was completed in April 2004.

4. Global Insight approached its task from two different points of view in order to obtain a comprehensive view of styrene and its economic role. Global Insight looked at the consumer benefits and economic contributions of styrene.

5. For consumer benefits, Global Insight identified the unique and specific physical and chemical properties of styrene and the qualities it imparts to major categories of products that contain it. Global Insight determined that although there are some applications in which other materials can replace styrene with small cost or performance penalties, in most instances the use of substitutes entails significant cost increases or performance losses.

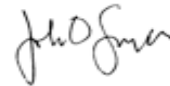
6. The study concluded that consumers would spend an additional \$18.5 billion per year (the equivalent of approximately \$1.90 per pound of styrene currently consumed) if styrenic products were replaced by substitute materials. Over 70 percent of the estimated benefits are attributed to polystyrene, unsaturated polyester resin (UPR), styrene butadiene rubber (SBR), and styrene butadiene latex (SB latex). In most cases, substitution in these end uses is very imperfect; consumers would suffer large losses in utility using alternate materials, and large new capital investments would be required to produce the substitutes.

7. For economic contributions, Global Insight identified the direct or indirect effects on employment, investment, trade, and taxes paid. This research employed more familiar economic data and modeling tools and took a narrow definition of the styrenics industry to avoid over-estimating its contribution to the American economy.

8. The study concluded that styrene is a \$28-billion industry comprising hundreds of companies with thousands of facilities. There are approximately 5,000 styrenics plants operating in the U.S. spread throughout nearly every state in the country. In all, nearly 450,000 workers depend on the styrenics industry for their livelihood. Styrene directly employs nearly 128,000 workers in monomer, polymer, and fabrication facilities. An additional 158,000 workers are employed indirectly in the wide network of supplier industries that provide goods and services to the styrenics industry. Finally, 157,000 workers are supported by the personal expenditures of the direct and indirect workers.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 14, 2011



John O. Snyder