

US EPA ARCHIVE DOCUMENT

**Appendix 7-1:  
CLI Kick-off Meeting Notes, Crystal City, VA, March 20, 1997**

**CLI Kick-off Meeting Notes**  
**Crystal City, VA**  
**March 20, 1997**

EPA Staff opened the day. The Phase I Report was distributed in March, so everyone should already have one. The report has also been downloaded extensively from EPA's web site.

They mentioned that the CLI project has been well received by management. CLI is now a line item of EPA's 1998 budget request to congress, and may be mentioned in the media, probably under the general category of the Children's Health or the Kalamazoo Initiatives. \$500,000 was requested for this project for FY98.

**Phase I - Wrap-Up, Steve Morrill - EPA**

The key points coming out of Phase I were reviewed to set the stage for the Phase II work. Steve Morrill's slides summarized the presentation. Please refer to Attachment E, presentation slides.

**Phase II - The Big Picture, Steve Morrill**

Steve Morrill presented an overview of several parts of Phase II: the Interim Label Improvements, Quantitative Research, Education Task Force, Policy Issues, and the Project Schedule. Please refer to presentation slides for details.

The question was asked as to whether the goal of "pollution prevention" continued to be part of this project. EPA staff confirmed that that was still a goal, although very difficult to measure. An industry representative did not want anything to imply that current products and their use were contributing to pollution unless there was support for that position.

It is not EPA's intent to generate data regarding potential adverse evidence on the impact of products. Rather, pollution prevention is just one of several goals and is included in the spirit of better consumer relations and re-inventing government. Nor does EPA expect that any direct and specific measurements will ever be attempted to show reduction in pollution as a result of the CLI. The focus of this project is primarily to make sure that consumers have and can use the information they want and need.

**Quantitative Research Proposal (Phase II), Mike Hilton - RISE/Bayer; Kathy Wurth - SC Johnson Wax; Carol Berning - Procter & Gamble**

Please refer to proposal and presentation slides for content. Overall, the group was supportive of the research plan. Discussion points included:

- We need to be careful that we don't confuse what consumers want vs. what they need.
- We need to be clear whether we are identifying label information that is *preferred* or information that leads to *recall* and *understanding*.
- We need to be clear about whether we are identifying where consumers *expect* to find information vs. where they *want* to find it.
- The group agreed that we should send a mock label (no existing brand) as opposed to a

branded label for the research. It was acknowledged that this will be more costly (but not much).

- Educators want to make sure we are measuring the effectiveness of signal words (danger, warning, caution).
- It was suggested that we collect information on current habits as a baseline for future studies.
- It was noted that the ideal measurement would be that of behavior change, not satisfaction. However, the group understood the difficulty and long term nature of such measurements.
- It was suggested that we collect some data on attitudes, which could also be baseline for future research.
- It was noted that companies need to deal with the physical size of labels, and the analyses of research must recognize information limitations due to label size, even if consumers say they want more and more information.
- It was noted that information which can't be communicated on the label might be dealt with via education.
- FDA mentioned work they had done to measure accuracy in information transfer by including false information on some labels to determine if consumers were processing information from different parts of the product label.
- EPA mentioned that if possible, they would be interested in gathering information on the benefits and drawbacks of using some sort of standardized "eco-facts box." One participant mentioned that some data exist that says consumers focus so much on the nutritional box now that they may underutilize other information on the box.

#### **Legal and Financial Issues, Mary Dominiak - EPA**

The Paperwork Reduction Act (PRA), the Federal Advisory Committee Act (FACA), and the Administrative Procedures Act (APA) require that EPA do things differently than the private sector. The primary effect will be on EPA's role in the quantitative research program.

EPA will not require, endorse, or fund the proposed FY97 quantitative research because EPA is not sponsoring the research from the PRA perspective. EPA is funding FY97 policy and education activities, will facilitate meetings, provide overall CLI Project management, perform data analyses, and prepare the final report. EPA can play no part in the proposed quantitative research beyond being a facilitator, consultant, and recipient.

RISE asked if it might be possible to get a grant from the Environment Stewardship Program. In the past, such grants have been used for consumer education programs. EPA feels this path could put the Agency in a sponsorship position.

Clorox asked if EPA could act as a funding clearinghouse. The answer was no. The group agreed that trade associations seem to be the right group to coordinate all funding of the quantitative research. SC Johnson Wax suggested that one of the environmental or public interest groups, or a charitable group associated with environmental issues (i.e., Pew Charitable Trust) could also serve this role. This, as well as an invitation to help fund the research, might increase trust among CLI participants and might enhance the credibility of non-EPA research

efforts. Several ideas were offered about alternative groups which might also supply some funding for such work.

The meeting participants agreed not to proceed with either questionnaire design or funding efforts until after a meeting with other interest groups (on April 15) so that their input could be factored into early consideration. A few companies did commit, through coordination with RISE, to fund some additional immediate work by NFO to continue to develop the research proposal.

**Partnership Issues, Amy Breedlove - EPA**

There will be a meeting on April 15 at Crystal Mall 2, with environmental groups, public interest groups, and other interested parties. to bring them up to date on the CLI project and introduce the quantitative research plan. NFO and Kathy Wurth plan to present the preliminary quantitative research outline on that date. All CLI participants are invited as well. Meeting participants noted the importance of, and their strong desire for, the ongoing participation of environmental and public interest groups in the CLI. Please refer to Attachment G and H for the letter of invitation and a complete list of invitees to the April 15 meeting.

**CLI Interim Label Improvements, Steve Morrill - EPA**

Please refer to the presentation slides for details about EPA's interim label improvements.

**Policy Initiatives**

Please refer to presentation slides for details on Ingredients and Health and Safety Information, and Storage and Disposal Label Issues.

*Standardization of Messages Across Product Categories, Julie Lynch - EPA*

Some people at EPA are interested in exploring the possibility of an "eco-facts box" on labeling (like nutrition box). To the extent possible, this idea will be explored in the quantitative research. Those involved in ISO 14000's Type III labeling standards are debating a set of environmental messages which would be standardized across products. EPA would like to draw on CLI findings to help the Agency contribute to the ISO effort. RISE asked whether the scope of this effort would include Health and Safety as well as environmental issues. This is not clear yet.

EPA is learning from FDA's experience with the food nutrition label and recent research on consumer needs regarding electricity deregulation. In other research, FDA has found that consumers seem to prefer charts and graphs rather than over simplistic or numerical data. EPA would not repeat previous work done previously in "Determinants of Effectiveness for environmental Certification and Labeling Programs." It was noted that in some of these other circumstances, attributes are more consistent across products, in contrast to CLI product categories, where many different attributes are relevant. EPA noted that the objective for the standardization of messages investigation is to lay out for the Agency what the complexities of this issue are.

**CLI Education Initiatives, Sally Patrick - Minnesota Pollution Control Agency**

Please refer to presentation slides for details about Minnesota's Consumer Label Education Program. A discussion regarding the concept of a "read the label" educational program followed. Several manufacturers noted that an educational program should focus on "read the label message" rather than focusing on infrequent but real risks of products regulated under FIFRA. A "common sense" approach to terminology (e.g. household hazardous waste) was urged as opposed to a strictly statutory interpretation. One manufacturer suggested that surveying existing solid waste management programs to find out where there might be gaps in educational efforts might be a good place to start.