

US EPA ARCHIVE DOCUMENT

**Appendix 7-2:
Summary of Partner and Task Force Meeting, February 17, 18, 1998**

Consumer Labeling Initiative
Summary of Partner and Task Force Meeting
February 17 - 18, 1998
Alexandria, VA

March 5, 1998

Action Items

Research Items

1. Sally Patrick of Minnesota will forward the MN booklet on English as a Second Language to EPA.
2. Partners and Task Force members will consult FDA research on nutrition boxes and other labeling research FDA has been involved in.
3. The Research Core Group will consider biasing issues in ordering the questions in the survey.
4. The Research Core Group will add an open-ended question at the end of the survey to capture top of mind responses on topics covered in the survey.
5. Brian Roe of FDA, Bob Hamilton of Amway, Sally Patrick of Minnesota, Bob Ochsman of CPSC, and Jim Hanna of King County, WA requested the survey questionnaire.
6. EPA will provide clarification on and a list of the environmental information to be addressed by the research and further considered for standardization for each product type.
7. The Research Core Group will incorporate questions in the survey to identify what consumers want to know about ingredients and where they go for this information.

Standardization Items

8. The Research Core Group will quantify if consumers perceive the signal words as intended, in what hierarchy, and what primary hazard is posed.
9. EPA will draft a scoping and limitations description of the quantitative research (review draft attached).
10. The Research Core Group will address:
 - a) pretesting the concept of standardized formats (or box) in the quantitative research, and
 - b) further qualitative research on format and content options.
11. Sally Patrick will determine if Minnesota can support the standardization research by conducting focus groups.

Consumer Education Items

12. Partners and Task Force members directed the Consumer Education work group to focus the message to encourage the consumer to "Read the Label" and inform his/her self.

Storage and Disposal Items

13. The Storage and Disposal work group will invite the input and/or participation of waste haulers and processors.

Project Management and Timeline Items

14. EPA will investigate its ability to conduct qualitative work on the presentation of standardized information that builds on the findings of the quantitative results.
15. Partners and Task Force members will meet again in late June or early July when the survey results and other project inputs are available.

Partners and Task Force Members Attending the February Meeting

NAME	ORGANIZATION
Rachel Coleman	Abt Associates Inc.
Andrew Stoeckle	Abt Associates Inc.
Robert Hamilton	Amway Corporation/Home Care Products
Mike Hilton	Bayer Corp.
Julie Spagnoli	Bayer Corp.
Brigid Klein	Chem. Specialties Mfrs Assn. (CSMA)
Greg Koontz	Chemical Prod. & Distributors Assn (CPDA)
Janice Podoll Frankle	Federal Trade Commission
George Meindl	FMC Corp.
Brian Roe	Food and Drug Administration
Janet Kreizman	Household/Industrial Product Info Council
Böb Skoglund	International Poison Center
Jim Hanna	King County WA Dept. of Natural Resources
Sally Patrick	Minnesota Pollution Control Agency
Laurel Ashbrook	NFO Research, Inc.
Gary Schifilliti	Olin Corp.
Mathew Grayer	Reckitt & Colman
Steve Rosenberg	Reckitt & Colman
Jan Wengler	Reckitt & Colman
Allen James	RISE
Alberta Helmke	S.C. Johnson Wax, Inc.
Stuart McArthur	S.C. Johnson Wax, Inc.
John Owens	S.C. Johnson Wax, Inc.
Dennis Ward	Solaris Group
Jim Hasler	The Clorox Company
William McCormick	The Clorox Company
Lizi Parker	The Clorox Company
Steve Smith	The Clorox Company
Maureen Howard	The Proctor & Gamble Company
Robert Ochsman	U.S. Consumer Products Safety Commission
Amy Breedlove	U.S. Environmental Protection Agency
Mary Dominiak	U.S. Environmental Protection Agency
Jim Downing	U.S. Environmental Protection Agency
Jean Frane	U.S. Environmental Protection Agency
Sue Nogas	U.S. Environmental Protection Agency
Cameo Smoot	U.S. Environmental Protection Agency
Susan Wayland	U.S. Environmental Protection Agency
Julie Winters	U.S. Environmental Protection Agency
Kathie Tryson	United Industries
John Miller	Vermont Agency of Natural Resources

Topics Covered

Introductions
Quantitative Research
Standardization of Environmental Information on Product Labels
Ingredients
First Aid
Other Issues for Consideration
Remarks from Susan Wayland and general discussion
Consumer Education
Stakeholder Involvement
Storage and Disposal
Overall Project Management/Timelines

Introductions

See attendee list (page 2).

Quantitative Research

Mike Hilton, Lizi Parker, and Julie Spagnoli updated Partners and Task Force members on the working group's progress and plans for implementing the survey. The group affirmed that the survey will address the learning objectives (page 7) defined in Phase I and should result in actionable items as outlined in the presentations. A statement explaining the scope of the survey, both what it will and will not do will be drafted (review draft attached, page 8). A schedule for completing the quantitative research was approved (last slide on page 17).

Discussion yielded the following decisions:

- ◆ Peer review of project methodology will occur once a CLI Phase II draft report is available and be included as a chapter in the final report.
- ◆ Stakeholders who have expressed interest or commented before will be invited to contribute opinions and input during the data analysis and recommendation phase

In addition, the working group will:

- ◆ Revisit question of bias through placement/location of questions
- ◆ Add open-ended question to capture miscellaneous comments at the end of survey
- ◆ Address current understanding of signal words
- ◆ Confer with Jim Downing on lists of environmental effects and ingredients.

Standardization of Environmental Information on Product Labels

Julie Spagnoli and Andrew Stoeckle of Abt Associates discussed some of the issues related to developing a standardized format for the presentation of environmental information. The effort will focus on information which is already available on labels. In the future, CLI may investigate the feasibility of including additional information. The survey currently includes questions which will provide data on what information consumers value most, but it does not test consumers' preference for format. The group agreed that consumer education would be an important component of any standardization strategy.

A small group will work further on the following issues:

- ◆ determining whether and how the quantitative survey can be used to learn if consumers want a standardized format for environmental information and pretest the concept of a standard format (or box).
- ◆ methods, resources and schedule for determining the best format for presenting standardized information, including a new qualitative step, based on the findings of the quantitative results.

Partners and Task Force members also requested additional direction and clarification from EPA management.

Ingredients

Cameo Smoot of OPP described efforts by the pesticide program to

- a) provide the public with enhanced availability of information on ingredients, and
- b) further address ingredient categorization.

OPP has not assessed consumers' needs and anticipates CLI's findings to learn what consumers want and need, and how to express it.

- ◆ It was decided to add a question on what consumers want to know about ingredients and where they go for this information.

First Aid

Amy Breedlove of OPP described the status of CLI work on First Aid. The qualitative results obtained in Phase I have been extensively reviewed. Macro International's work will be included in the Phase II report. The quantitative survey will also contain some questions on First Aid. A PR notice will be published in the late spring or summer on the revised First Aid statements.

Other Issues for Consideration

Julie Winters noted that the following issues are not covered in full detail under CLI: multi-lingual and literacy, icons, signal words, label format (i.e., font and color) and environmental claims. Partners and Task Force members directed the Quantitative Research group to discuss testing consumer understanding of the signal words, "CAUTION", "WARNING" and "DANGER" and the hazard statements associated with them. Partners and Task Force members also noted that labels present only negative information about hazards. Although current regulations generally prohibit the use of positive statements, the Quantitative Research group will consider using the survey to test the use of a list of limited exceptions developed by Jim Downing of OPP.

Remarks and Discussion with Susan Wayland, Deputy Assistant Administrator for the Office of Prevention, Pesticides and Toxic Substances

Susan Wayland thanked attendees for their time, effort and commitment, commended the project for going directly to consumers, and asked for input. Label changes as of this spring attest to the impact of CLI. EPA is very interested in information the survey will provide on Storage and Disposal issues, Ingredients, First Aid, Standardization, and Consumer Education. Lynn Goldman and Susan Wayland particularly encourage the group to find out what information consumers want standardized and how they want that information presented.

Discussion points included:

- ◆ EPA is committed to seeking the middle ground in balancing consumers' interest in additional information about ingredients with industry's concern for confidentiality. If consumers don't find complete chemical names useful, all parties might be served by the disclosure of ingredient categories.
- ◆ EPA encourages CLI researchers to obtain data on what environmental information consumers want to know as well as how they would like information displayed within the original timeframe of Phase II.
- ◆ Both Sally Patrick (MN) and EPA staff will investigate the feasibility of using focus groups to provide qualitative learnings on standardization formats to complement the quantitative survey data on information most valued by consumers.

Consumer Education

Mary Dominiak, Sally Patrick and Julie Spagnoli presented the Consumer Education group's work plan. The initial campaign will focus on presenting positive reasons to "Read the Label" and encouraging the consumer to view labels as a valuable source of information. The message will be further refined and targeted toward specific populations as the survey results become available. Partners and Task Force members will identify ways their organizations can help. CLI will also seek alliances with organizations such as local Poison Control Centers which have related missions. Partners and Task Force members advised the working group that the goal is to encourage consumers to inform themselves rather than conditioning them to choose the least hazardous product.

Additional issues which the Consumer Education group will address include:

- ◆ the need to measure results of the educational strategy

Stakeholder Involvement

Julie Winters discussed outreach efforts to date. EPA plans to continue efforts to receive input on CLI issues from all stakeholders. All views will be considered, addressed, and documented and included in the final report.

Storage and Disposal

Amy Breedlove summarized CLI work on Storage and Disposal. The working group will continue to assess the extent to which information on labels conflicts with local/state laws. Partners and Task Force members recommended that the group solicit the input of waste haulers and processors on this issue. The Abt report will be done by late March or early April.

Overall Project Management and Timelines

Partners and Task Force members approved the project timeline. A first draft of the survey report will be available on June 19th, which will allow time for qualitative study on standardization format for inclusion in the Phase II report. In addition, by May 30, each of the other sub-project areas (Storage and Disposal, Consumer Education, Standardization of Environmental Information, and Ingredients) will have completed their consideration and prepared findings for input to the Partners, Task Force members and other stakeholders. CLI Partners and Task Force members will reconvene in late June or early July to consider all learnings and inputs to form Phase II recommendations.

List of Attachments

- ◆ Learning Objectives Addressed in Questionnaire Design
- ◆ Scoping and Limitations review draft
- ◆ Presentation Slides and Materials

Learning Objectives Adressed in Questionnaire Design

	Objective #1	Objective #2	Objective #3	Objective #4	Objective #5	Objective #6
Survey Questions	Satisfaction with Labels	Hierarchy of Information	Expected Location of Information	Comprehension	FIFRA vs. Non-FIFRA	Standardized Information
Phone Instrument						
Ease of finding sections - accurate identification - consumer opinion	X	X	X			
Language comprehension - consumer opinion - key words/phrases				X		

Written Instrument						
Overall Satisfaction with current labels	X					
Where/how often read sections of the label		X	X			X
Most/least important information		X				X
Expected location of information		X	X			X
Other sources of information						
Likes/dislikes about label sections	X			X	X	
Meaning of recycling symbols		X		X		
FIFRA/non-FIFRA preference					X	
Paired preference statements					X	
Attitude statements						
Habits and Practices						

Scope and Limitations of Consumer Labeling Initiative's Survey Instruments

Phase I research, completed in 1996, used primarily qualitative research (one-on-one interviews) to investigate consumer understanding and to identify problems related to FIFRA-related product labels. An Interim Report documents these efforts and the Phase I findings. The Phase II investigation (both the issues addressed and research design) builds upon the learning of Phase I. Phase II will, for example, clarify consumer understanding of particular label elements as well as quantify the prevalence of problems, attitudes and beliefs that were identified in the one-on-one interviews.

Guidance for the survey design was provided by the six learning objectives established by the CLI Task Force and Partners at the start of Phase II.

1. Determine the current situation relative to consumers' satisfaction with the format and content of existing labels.
2. Determine consumers' hierarchy of importance of basic label information.
3. Determine where on the label consumers expect to find particular information, such as first aid or ingredients.
4. Determine consumers' current comprehension of label language.
5. Determine whether or not a preference exists for non-FIFRA over FIFRA labels (possible for Household Cleaners category only).
6. Determine consumers' reaction to standardized safe use, environmental, health and safety information.

The learning objectives were intended to focus research on a few very specific issues related to improving labels. Each is intended to generate research findings which will enable EPA and/or CLI participants to take immediate and near-term steps towards label improvements. Some changes, such as revised guidance and regulations, would be almost entirely under the purview of EPA. Others, such as consumer education, would involve many stakeholders and require a longer time frame.

Objective 1: Determine the current situation relative to consumers' satisfaction with the format and content of existing labels.	
Action Steps	Limitations
> If current labels are not meeting consumers' needs, provide general input on which sections need further revisions.	Results from this objective (consumer preferences) are directional only. Tactical actions will come from other objectives.

Objective 2: Determine consumers' hierarchy of importance of basic label information.
 Objective 3: Determine where on the label consumers expect to find particular information, such as first aid or ingredients.

Action Steps	Limitations
<ul style="list-style-type: none"> > Make format recommendations, such as organizing information when needed in the store, before use, or in case of emergency. 	<p>These objectives, in combination with Objective #6, will let researchers identify what consumers want to know and make format (location) recommendations. We will not be designing a conclusive format. Final format recommendations to OPP will be made after a qualitative study is completed immediately following the quantitative study.</p>

Objective 4: Determine consumers' current comprehension of label language.

Action Steps	Limitations
<ul style="list-style-type: none"> > Identify terminology that consumers find difficult to understand. > Recommend additional qualitative work with consumers to understand what terminology should be used, as appropriate. > Recommend word changes (limited). 	<p>Every possible wording change cannot be evaluated. Additional study may be needed to test alternative text for several sections of the label.</p>

Objective 5: Determine whether or not a preference exists for non-FIFRA over FIFRA labels.

Action Steps	Limitations
<ul style="list-style-type: none"> > Quantify whether non-FIFRA label sections are preferred to FIFRA. > Make word changes where possible. > Make format recommendations, such as organizing information when needed in the store, before use, or in case of emergency. 	<p>Will not be comparing alternative labels side by side. Will be done for household cleaner category.</p>

Objective 6: Determine consumers' reaction to standardized safe use, environmental, health and safety information.	
Action Steps	Limitations
<ul style="list-style-type: none"> > Provide direction on types of information that could be standardized. > Make preliminary format (location) recommendations. 	See #2/#3

In addition, there are a number of survey design considerations and assumptions that are important for reviewers of the survey instruments. The survey design calls for separate surveys for each of the three CLI product categories: household hard surface cleaners, indoor insecticides and outdoor pesticides. Thus, the survey instruments differ slightly for each product category. Eligible heads of household, identified by a short screening questionnaire, will be sent a package with an instruction letter, a mock label, and a sealed written questionnaire. The telephone survey will be conducted by National Family Opinion to test consumer comprehension of label elements and ease of locating key label sections. Respondents will then complete and return the written survey (to probe overall satisfaction with current labels, preferences about label sections, attitudes and behaviors) at their leisure.

The survey, as currently designed, focuses on gathering information related to consumer interactions and perceptions of current labels. It will also provide direction for the next phase of work which includes: 1) designing and testing alternative text and formats which are expected to improve the label's performance in the marketplace and 2) other CLI work, such as the public education campaign.

Ingredients

Currently evaluating what can be incorporated in the study to address issues related to full disclosure. In general, we will seek to determine what ingredient information consumers desire to see on the label.

Consumer Label Initiative Market Research Quantitative Phase II



February 17, 1998

General Learning Objectives

- ▶ Test overall comprehension of label on:
 - safe product use
 - environmental, health, & safety information
- ▶ Determine what, if any, label changes would better meet consumers needs
- ▶ Provide input regarding changes



Product Label Purpose

- ▶ The purpose of a product label is to help consumers:
 - choose the product that meets their needs
 - use, store, and dispose of products safely



Specific Key Learning Objectives

1. Current situation relative to satisfaction with the format & content of existing labels
2. Hierarchy of importance of basic label information
3. Where information is expected to be found on the label
4. Comprehension of label language
5. Preference for FIFRA vs non-FIFRA label
6. Reaction to standardized information on safe use, environmental, & health information



Market Research Design

- ▶ Pre-test questionnaire to ensure accuracy
- ▶ Recruit sample of current HH cleaner, indoor insecticides, and outdoor pesticide users
 - Over Quota for less education and lower income HHs
- ▶ Research survey consists of two parts
 - Part 1: Phone questionnaire conducted by interviewer
 - Part 2: Written questionnaire completed by respondents
- ▶ Data tabulated and analyzed



Market Research Design

- ▶ Respondents will receive by mail at home:
 - An instruction letter
 - study instructions include a reminder not to open material until phoned
 - A mock label
 - Written questionnaire in sealed envelope
 - An incentive



Sample



Mock Label

- ▶ Simulates real products
- ▶ Printed front & back in black & white
- ▶ Shaped like products in category
- ▶ Heavy cardstock



Example Mock Label

- ▶ Will have overheads of 3 category mock labels to show if needed.



Phone Questionnaire Outline

1. Ease of locating key label sections
 - accuracy of finding correct sections
 - consumers' opinion of ease of finding sections
2. Comprehension of language by section
 - consumers' opinion asked first
 - key words/phrases probed next
3. Demographics



Questionnaire

Research Components

- ▶ Phone
 - Conducted first by a trained interviewer
 - Uses a mock label
 - Approximately 10-12 minutes
- ▶ Written
 - Interviewer then instructs them to complete written survey
 - Completed by the consumers at their leisure
 - Uses the same mock label



Written Questionnaire Outline

1. Overall satisfaction with current labels
2. Where/How often read sections of labels
 - In-store, when using, if do not read, why not
3. Most/least important information to consumer
4. Where expect to find info. on label & which want to find most easily
5. Other sources of product information
6. Likes/dislikes about label sections
7. Meaning of recycling icons
 - meaning, what actions would take, where find on package



<p>Learning Objective 1</p> <p>Current situation relative to satisfaction with the format & content of existing labels</p> <ul style="list-style-type: none"> ▶ Phone <ul style="list-style-type: none"> ▪ Ease of locating key label sections ▶ Written <ul style="list-style-type: none"> - Overall satisfaction with current labels - Likes/dislikes about label sections 	<p>Learning Objective 2 & 3</p> <p>2: Hierarchy 3: Expected location</p> <ul style="list-style-type: none"> ▶ Phone <ul style="list-style-type: none"> ▪ Ease of locating key label sections ▶ Written <ul style="list-style-type: none"> - Where/How often read sections of labels - Most/least important information to consumer - Where expect to find information on label & which want to find most easily - Where expect to find recycling icons
	

<p>Learning Objective 1</p> <p>Current situation relative to satisfaction with the format & content of existing labels</p> <p>Action Steps</p> <ol style="list-style-type: none"> 1. If current labels are not meeting consumers' needs, provide general input on which sections need further revisions 	<p>Learning Objective 2 & 3 cont.</p> <p>2: Hierarchy 3: Expected location</p> <p>Action Steps</p> <ol style="list-style-type: none"> 1. Make format recommendations, such as organizing information when needed in the store, before use, or in case of emergency
	

Written Questionnaire Outline Cont.

8. FIFRA/non-FIFRA preference (HH cleaners only)
9. Paired preference statements
 - FIFRA and alternate wording
10. Attitude statements
11. Habits & practices
 - products used
 - accident experience
 - current storage/disposal/recycling practices
 - incidence of category use and non-purchase due to label confusion



What sections of the questionnaire will address each of these learning objectives?



Review Learning Objectives

1. Current situation relative to satisfaction with the format & content of existing labels
2. Hierarchy of importance of basic label information
3. Where information is expected to be found on the label
4. Comprehension of label language
5. Preference for FIFRA vs non-FIFRA
6. Reaction to standardized information on safe use, environmental, & health information



General Learning Objectives

Action Steps

- ▶ All sections will be used in conjunction with each other to provide information:
 - to guide the educational committees' efforts
 - for storage & disposal recommendations
 - regarding potential format (location of information only) changes



Learning Objective 4 Comprehension of label language

- ▶ Phone
 - Comprehension of language by section
- ▶ Written
 - Meaning of recycling icons
 - Likes/dislikes about label sections



Learning Objective 5 Preference for FIFRA vs non-FIFRA

- ▶ HH Cleaner category only
- ▶ Written
 - Likes/dislikes about label sections
 - FIFRA/non-FIFRA preference
 - Paired preference statements



Learning Objective 4 cont. Comprehension of label language

- Action Steps**
1. Identify terminology that consumers find difficult to understand
 2. Recommend additional qualitative work with consumers to understand what terminology should be used, as appropriate
 3. Recommend word changes (limited)



Learning Objective 5 cont. Preference for FIFRA vs non-FIFRA

- Action Steps**
1. Quantify whether non-FIFRA label sections are preferred to FIFRA
 2. Make word changes where possible
 3. Make format recommendations, such as organizing information when needed in the store, before use, or in case of emergency



Learning Objective 6

Reaction to standardized information on safe use, environmental, & health information

- ▶ Written
 - Most/least important information to consumer
 - Where expect to find information on label & which want to find most easily
 - Where/How often read sections of labels
- Action Steps
 1. Provide direction on types of information that could be standardized
 2. Make format (location) recommendations



Special Interest Areas:

Format (location of information)

- ▶ Phone
 - Ease of locating key label sections
- ▶ Written
 - Where/How often read sections of labels
 - Most/least important information
 - Where expect to find info. & what want to find most easily
 - Where expect recycling icons to appear



Special Interest Areas: Ingredients

- ▶ Phone
 - Ease of locating information
 - Comprehension of language by section (inert)
- ▶ Written
 - Where/How often read sections of labels
 - Most/least important information
 - Where expect to find info. & which want to find most easily
 - FIFRA/non-FIFRA preference
 - Attitude statements
- ▶ Currently exploring alternatives on how to address what ingredient information consumers want to know



Research Time Line

Activity	Start Date
Questionnaire input received from stakeholders, partners, task force	February & March
Field screener	March 2
Pilot questionnaire	April 1
Field questionnaire	April 13
Data Available	June 5
Draft Analysis	June 19



DRAFT

February 9, 1998

Background Paper on the Standardization of Environmental Information on Product Labels

PURPOSE: To explore issues related to standardizing environmental information on labels and to engage stakeholders in framing the debate.

The U.S. Environmental Protection Agency (EPA) and others have sought to improve consumer access to and understanding of environmental information related to the products they purchase and use. The underlying objective of such standardization efforts, as well as labeling in general, is to enable consumers to make informed choices. Thus, the marketplace, through the collective, informed decisions of consumers, compliments governmental regulations in setting public policy. EPA and others have considered standardization of information through a number of activities including, for example: EPA's ongoing Consumer Labeling Initiative, the development of labeling standards by the International Standards Organization (ISO), and the Federal Trade Commission's guidelines for environmental marketing claims. In the U.S., the most common and well-known example of standardized label information and format designed for individual consumers is the food nutrition label.

This paper examines the possibility and limitations of standardizing environmental information, specifically that information required by environmental statutes, such as FIFRA, for household consumer products. The focus of this paper is to help identify the issues and frame the debate on standardizing the format, type and text of existing information, not altering the content and not including additional information which is not presently gathered. The paper is meant to be a starting point for EPA's discussions with a wide range of stakeholders. The views presented here do not represent EPA policy positions. EPA emphasizes the importance of stakeholders, including consumers, in shaping and guiding any investigations into this topic.

Unlike the nutrition label and hazard warning labels, presenting product-specific environmental information to consumers is particularly challenging for a number of reasons:

- the information is complex (ranging from application instructions which, when followed, can reduce threats to the ecosystem to recycled content of the container which relate to the waste minimizations efforts of the manufacturer);
- often, consumers cannot readily perceive the environmental attributes of a product during purchase, use and disposal;
- estimating possible *impacts* (as part of a life cycle analysis) require assumptions regarding chemical fate and transport, exposure, etc.; and
- each consumer places a unique set of values on the many environmental and other product attributes (such as, price, quality and availability).

Standardization is expected to offer consumers real benefits in making information more accessible and allowing useful product comparisons. Among the questions facing policy makers and researchers are: Is such standardization technically feasible? What, if any, regulations would have to be changed? and, Would the benefits exceed the costs? This initial paper is limited in scope -- it examines a number of issues related to questions of feasibility only.

DRAFT

February 9, 1998

While ISO efforts call for most labeling efforts to be based on an evaluation of the full life cycle of products, this approach is not feasible. Some of the product categories within the scope of CLI are subject to FIFRA, which establishes, by rule, the information to be presented on labels for such products. The FIFRA-required information covers not only the product itself (based on the evaluation of the product formulation and its active ingredients) but also the package or container. The resulting information for the product includes: ingredients, precautionary statements, signal words, first aid, physical and safety hazards, environmental and human health hazards. The packaging information typically related only to instructions concerning disposal. Additional information about the package (e.g., its recycled content or recyclability) and product (e.g., contains no phosphates) regularly appears and is already presented in a standardized format by one company. However, expanding the type of information to include natural resource use, and production-related impacts as part of a life cycle analysis (LCA) is beyond the scope of information currently available. To require such additional information on FIFRA-regulated products would involve revisions to guidance and regulations.

Another issue to be considered is whether some of the information currently presented qualitatively in text form could be presented quantitatively. For example, toxicological information (e.g., LD₅₀s) could be presented quantitatively. Information for each of the five hazard categories might be presented in a matrix or just the primary hazards (along a I to VI scale). Presenting such complex toxicological information may, in fact, overwhelm consumers and cannot be considered without extensive market research. In addition, such a format might also be used to present the attributes of a product relative to those of other similar products or to the full range of values. For example, additional context might be provided for the signal words if CAUTION->WARNING->DANGER scale appeared with the appropriate word highlighted. Alternatively, a scale (e.g., numbered 1-10) with a product-specific mark could be used to replace the signal word. While the previous examples of quantitative information are possible using existing information, this information is not currently presented on labels.

Including icons was considered as part of CLI research but was tabled as too complicated to investigate at this time along with wording comprehension and preferences. Several researchers have expressed concern about using icons to replace the content of current text because there is little consensus on consumer benefit and little experience in the U.S. with using icons to represent such environmental information. However, icons and/or graphics might be included to augment label information -- e.g., assist consumers in finding the environmental, health and safety portion of the label and to identify particular topics (e.g., precautions concerning exposure to domestic animals/pets, telephone numbers and first aid).

While ease of use and ready understanding are goals of standardization, it should be stressed that it is critical that consumers still be directed to read the entire label. Revisions that increase the risk of skipping sections of the label will jeopardize the labeled guidance that products are "safe if used as directed."

DRAFT

February 9, 1998

In addition to the limitations of standardization noted above, any such changes to current labeling requirements must not depart from the current regulatory requirements. Standardization would, at a minimum require that regulatory guidance be revised substantially. For example, font size and phrasing are established by a combination of regulation and guidance.

Examples 1 and 2 are provided to aid in thinking and are not intended to be proposed formats. Example 1 is a compilation of facts that might be used for quick reference. Example 2 is a compilation of most of the information currently on labels and may facilitate product-to-product comparisons.

DRAFT

February 9, 1998

Standardization Example 1:

PRODUCT FACTS		
Active Ingredient(s)	Cyfluthrin	Imidacloprid
Chemical Identification No.	CAS # 12590-57-3	CAS# 34569-98-5
Chemical Category	synthetic pyrethroid	chloronicotinyl
Other Ingredients	Water, Glycerin (to keep from freezing) Emulsifiers	
Use	Multipurpose insect control on lawns, flowers, specified vegetables, trees, shrubs, groundcovers.	
Hazard Category	IV (minimal)	
Principle Hazard to User(s)	None	
Precautions	Keep out of reach of children. Wash hands after use. If product gets on clothing, wash before rewearing.	
Treated Area can be entered	After use.	
Environmental Hazards	Toxic to fish, aquatic insects, bees	
Environmental Precautions	Do not spray or allow product to drift into water. Do not use when bees are active.	
Other:		
READ ENTIRE LABEL FOR USE DIRECTIONS, INCLUDING PROPER STORAGE AND DISPOSAL		

DRAFT

February 9, 1998

Standardization Example 2:

FOR SAFE AND EFFECTIVE USE, PLEASE READ THE ENTIRE FRONT AND BACK LABEL

HUMAN HEALTH	Precautions	First Aid
If swallowed	Keep out of reach of children. Do not let children on treated areas until material has been sprinkled and the grass is dry. Do not contaminate feed or foodstuffs.	Call a physician or Poison Control Center immediately. Induce vomiting by giving victim 1 or 2 glasses of water and touching the back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious or convulsing person.
If in eyes		Flush eyes with plenty of water. Get medical attention.
If inhaled	Do not breathe dust.	Remove victim to fresh air. Apply artificial respiration if indicated. Get medical attention immediately.

Please READ the entire Directions for Use and Storage and Disposal sections for other precautions. Do not let children on treated areas until material has been sprinkled and the grass is dry.

ENVIRONMENT	Possible Effects and Precautions
Water	Do not apply directly to water, or areas where surface water is present or to intertidal areas below the mean high water mark
Air	None listed.
Animals	This product is toxic to fish, birds, and wildlife. Do not use treated areas for feed or forage. Do not let pets on treated areas until material has been sprinkled and the grass is dry.

Please READ the entire Directions for Use and Storage and Disposal sections for other precautions. Do not contaminate water by cleaning of equipment or disposal of wastes.

STORAGE & DISPOSAL	Storage	Disposal
Product	Store in its original container in a cool, dry, locked place out of reach of children.	Wastes resulting from the use of this product may be disposed of at an approved waste disposal facility.
Package/Container		Completely empty container into application equipment. Then dispose of bag in a sanitary landfill.

More text if needed.....

Consumer Label Initiative

- **Label Standardization**

- **Nutritional Labeling “Box” concept**
- **Utilize existing label information**
- **Standard format will aid consumers in product selection**

Consumer Label Initiative

- **Label Standardization**

- **Hierarchy of information/content can be determined from quantitative study**
- **Can achieve objective of putting information where consumers expect to find it**
- **Less “clutter” on labels**

Consumer Label Initiative

● Label Standardization

- Addition information can be developed in the future
- “Eco-profiles” used in other consumer product
- Perhaps solicit inputs on how assessments can be done from group like SCS (Green Cross)

Consumer Label Initiative

PRODUCT FACTS:	
Active Ingredient(s)	Cyfluthrin
Chemical Identification No.	CAS # 12590-57-3
Chemical Category	Synthetic pyrethroid
Other Ingredients	Water, Emulsifiers
Use	Multipurpose insect control on lawns, flowers, specified vegetables, trees, shrubs, groundcovers.
Hazard Category	III (Slight)
Principle Hazard to User(s)	Eye irritation; Possible skin irritation
Precautions	Keep out of reach of children. Keep away from eyes. Wash hands after use. If product gets on clothing, remove and wash before reweaving.
Treated Area can be entered	When spray has dried.
Environmental Hazards	Toxic to fish, aquatic insects, bees
Environmental Precautions	Do not spray or allow product to drift into water. Do not use when bees are active.
Other:	
READ ENTIRE LABEL FOR USE DIRECTIONS, INCLUDING PROPER STORAGE AND DISPOSAL	

OPP Activities on Inert Ingredients

Cameo G. Smoot
Policy and Regulatory Service Branch
Office of Pesticide Programs

Background

OPP Listing Policy

In 1987, EPA took new steps to reduce the potential for adverse effects from the use of pesticide products containing toxic inert ingredients. The inert ingredients were categorized into four lists.

- List 1 ingredients, "inerts of toxicological concern," are chemicals found to produce cancer, adverse reproductive or developmental effects, or other adverse chronic health or environmental effects.
- List 2 inerts are "potentially toxic with a high priority for testing."

Background (continued)

- List 3 are "inerts of unknown toxicity."
- List 4 "inerts of minimal concern" are divided into two groups: 4A covers minimal hazard inerts (e.g., cookie crumbs), and List 4B represents ingredients where there is "sufficient information to conclude that their current use patterns in pesticide products would not adversely affect public health and the environment" (e.g., polyethylene glycol).
- The 1987 policy also identified a "base set" for testing of inerts.
- The policy requires disclosure of List 1 inerts on the product label.

Impact of the 1987 Policy

List 1

- Pesticide manufacturers have either reformulated or discontinued products containing most List 1 ingredients.
- Of the 1330 products initially containing List 1 inert ingredients, less than 70 products continue to contain a List 1 ingredient.

List 2

- Of the original 64 ingredients on List 2, about 15 have been deleted.

Impact of the 1987 Policy (continued)

List 3

- This list has grown significantly. Generally because the original list was comprised of categories of ingredients. Once more information was identified, each individual inert substance was listed.

List 4

- Number has increased because of reclassification from List 3.

Current Activities

Managing the Listing of Inerts

One of OPP goals is to reclassify inert ingredients into either List 1 or List 4. To accomplish this, OPP is focusing on obtaining additional health and safety data. The primary strategy for obtaining this information is:

- identification and evaluation of additional data
- close examination of the potential toxicity and actual use of a substance

New Screening Methods

Of the approximately 2500 inert ingredients, the largest number, about 1900, are on List 3. Since full toxicological data bases are not available for these substances, OPP developed a screening mechanism that would prioritize this group by:

- Structure activity relationships
- Estimated potential exposure

In 1995 OPP was able to reclassify 146 substances from List 3 to List 4B (60 FR 35396, July 7, 1995). OPP is working hard to reclassify more this year.

Efforts to expand access to Ingredient Information

Over the past several years OPP has been encouraged to expand access to ingredient information:

- Public FOIA requests for ingredient information have significantly increased. New E-FOIA law requires Agency's to respond electronically if requested to do so. Agency policy requires posting responses to repeat inquires on the Internet.
- NCAP v. Browner case brought to light inefficiencies in the internal CBI process.
- Electronic information processing: internally to meet new deadlines of FQPA; externally OMB exerts a strong push for electronic processing of all government information.

Enhancing Availability of Inert Ingredient Information

OPP is committed to enhancing public availability of information on inert ingredients while working within the mandates of the FIFRA and related Confidential Business Information concerns. Some of the areas under investigation are:

- Reviewing FIFRA and other regulatory frameworks to provide new tools for enhancing ingredient information:
 - breadth of disclosure under of FIFRA
 - FDA labeling approach
- Reviewing proposals for revised label disclosure
 - NCAP and the State Attorneys General petitions
- Anticipating CLI efforts to provide insight into consumer needs and how to express them

Consumer Labeling Initiative Consumer Education Program

Julie Spagnoli, Bayer Corp.
Sally Patrick, MPCA
Mary Dominiak, EPA

Consumer Education Program

- Recommended by *CLI Phase I Report*
- Immediate and long term components:
 - "Read the Label" campaign to get people to focus on the label to help in *buying the right product* and *using and disposing of it safely*.
 - Subsequent additions to campaign to:
 - alert people to changes in labels
 - help them understand and interpret label information

"Read the Label" Campaign

- Create a common logo (i.e., MPCA's eye) that all groups – government, industry, and public interest groups – can incorporate freely into advertising and other messages.
- Keep it simple: "Read the Label" base message, always accompanied by a reason *why* reading the label is to the consumer's advantage.

"Read the Label" Campaign

- "Reasons Why" – Be Smart, Be Safe, Do The Right Thing, Feel Good
 - Be safe: labels tell you how to store and use product so you, kids, and pets will be safe
 - Save money: labels say what and how much to use; when you don't waste, you save money
 - Help environment: buy the right thing, just enough for your needs, prevent pollution
 - What things mean: signal words, symbols, etc.

"Read the Label" Campaign

- Avenues to convey message:
 - Product advertising
 - television, print, radio, label, posters, brochures
 - Public service announcements/print ads
 - solo, shared sponsorship, multi-purpose
 - Tie-in to existing information campaigns
 - local government waste/recycling/health programs
 - information distribution by government, environmental and public interest groups; newsletters; websites

"Read the Label" Campaign

- Target to specific audiences
 - pediatrician offices
 - veterinary offices
 - schools
 - hardware/retail store displays for consumers
 - hardware/retail store/nursery salespeople
 - master gardeners

"Read the Label" Campaign

■ Schedule

- Adopt concept; approve strategy – 2/98
- Contribute to quant. research – 11/97-3/98
- Workgroup develops communications strategy to target selected audiences, develop logo, and place message for delivery – 2/98-3/98
- Contractors develop message scripts/graphics; reviewed & approved by workgroup, Steering Cmte, EPA; solicit existing program tie-ins – 4/98-6/98
- Final approval and campaign launch – 7/98

"Read the Label" Campaign

■ Issues for resolution

- Commitment to program
 - People, resources, and agreement to implement in existing corporate, government, and other programs
- Precisely who does what to make it work
- Reality check on schedule
- Strategies for measuring effectiveness
- Plan to build future components of campaign

Consumer Label Initiative

- **EPA's CLI Goals**
 - Foster Pollution Prevention
 - Empower Consumer Choice
 - Improve Consumer Understanding of
 - Safe Use
 - Environmental and Health Information

Consumer Label Initiative

- **Benefit for Industry Partners**
 - Learn how to provide clear information so consumers can make informed choices based on their needs and values, and use chosen products safely as directed

Consumer Education Program

- **Objectives for Public Education:**
Promote CLI's objectives by encouraging by the reading of labeling
 - Informed Product Choices
 - Proper/safe use, storage and disposal

Consumer Education Program

- **Objectives for Public Education**
 - Public Service Announcements: Written and other media
 - Product Advertising
 - Point of purchase materials
 - School programs / ambassador programs

Consumer Education Program

- **Public Education: Current Industry Activities**
 - Best Management Practices – Safety: Apply It First
 - ACPA School programs(Benny Broccoli & friends)
 - Ambassador Programs: ACPA and RISE
 - Web Sites & Links

Consumer Label Initiative

- **Benefit for Industry Partners**
 - Learn how to provide clear information so consumers can make informed choices based on their needs and values, and use chosen products safely as directed

Consumer Education Program

- **Benefits for Industry Partners**
 - **Customer Satisfaction**
 - » more likely to repeat purchase
 - » fewer complaints
 - **Fewer adverse incidents**
 - **Promote label improvements**
 - **PR/Customer Relation**

Consumer Education Program

- **Public Education: Industry Roles**
 - **Promotion of campaign and use of logo**
 - » in print ads & Web Sites
 - » Point of purchase materials: Posters, brochures
 - » School programs
 - » Ambassador Programs

Consumer Education Program

- **What Industry Partners Can Provide**
 - **PR/Advertising Expertise**
 - » parallel to research efforts
 - **Distribution of educational materials**
 - **Sponsor Public Service Announcement(?)**

**STORAGE AND DISPOSAL
PRESENTATION
TO
CLI PARTNER/TASK FORCE MEETING**

February 18, 1998

List of Subgroup Members

Philip Dickey	Washington Toxics Coalition
Rachel Donnette	Public Health & Social Svcs Dept, Olympia WA
Dana Duxbury	WasteWatch Center
Jim Hanna	King Cty, WA; Dept of Natural Resources
Brian Johnson	Environmental Programs Div, City of Santa Monica
Brigid Klein	Chemical Specialty Manufacturers Assoc.
Janet Kreizman	Household & Institutional Products Information Council
John Owens	SC Johnson Wax

List of Subgroup Members

Richard Pantages	Alameda Cty HHW, Alameda CA
Sally Patrick	Minnesota Pollution Control Agency
Leigh Scott	Triangle J Council of Governments, NC
Marie Steinwachs	Outreach & Extension, Univ. Of Missouri
Kathie Tryson	United Industries
Jan Wengler	Reckitt & Colman
Lecanne Wooden	Seattle Public Utilities, HHW Section

EPA Staff Lead
Amy Breedlove, Office of Pesticide Programs

PROJECT GOAL

Investigate product and container storage and disposal issues to better understand State, Local, and consumer perceptions and needs for storage and disposal information on the label. Revise label language as necessary.

PROJECT'S PHASE I HISTORY

Phase I found, among other things:

- consumers aren't reading the storage and disposal instructions
- they are frequently recycling the plastic containers, and
- existing disposal language often conflicts with existing State or local laws or practices.

Phase I Report suggested a group be formed to examine this issue and produce a white paper for inclusion in the Phase II Report.

STRATEGY

- Form a Subgroup of Partners and Task Force (PTF) members interested in storage and disposal issues.
- Research to determine the status quo regarding state and local storage and disposal regulations and practices.
- Coordinate and meet with CLI Subgroup to determine critical issues and develop recommendations to address those issues.
- Meet with CLI Partner/Task Force in Feb 98 to solicit ideas and get approval for a proposed course of action.

STRATEGY (cont'd)

- Hold additional meetings, as needed, with State/Local disposal/recycling program representatives and work with Regions to address issues.
- Have Abt prepare an initial paper summarizing results of the literature search and NAHMMA survey results for review and comment. Paper will be published in the Phase II Report.
- Prepare additional papers addressing issues and/or containing recommendations, including information from the quantitative survey.

MILESTONES

TARGET DATES

- | | |
|--|---------|
| Organizational:
Form Subgroup of Partners/TF Members | Jan-Feb |
| Conference calls/working meetings | |
| Fact-Finding:
Provide ad hoc input to development of quantitative research | Feb-Apr |
| Research on status quo and other issues | |
| Hold additional meetings with Regional/State/Local program reps | |

MILESTONES

TARGET DATES

- | | |
|--|-----------|
| Analysis:
Review and analyze quantitative findings | Apr-Jul |
| Analyze collected data | |
| Develop and test recommendations | |
| Develop and circulate, for comment, position papers | |
| Documentation:
Develop final Recommendations Paper | Jul - Aug |
| Assist in Phase II Report Writing | |

WORK DONE TO DATE

- Attended NAHMMA meeting
- Conference call with members
- Abt completed literature search and initial contact calls
- NAHMMA distributed our questions to NAHMMA members
 - we received responses in Feb 98
 - have begun initial analysis of responses

POTENTIAL TOPICS TO ADDRESS AND RESOLVE

1. Understanding the status quo
2. Determining Recycling Policies, Issues, and Practices
3. Address triple rinsing of containers
4. What's our message?
5. How do we refer to the various state/local authorities

POTENTIAL TOPICS (cont'd)

6. Should we use a central phone number
7. Are there barriers to remove
8. Cleaners - do they have their own issues
9. Motivation/Behavior Change/Education

LINKS WITH QUANTITATIVE SURVEY

Phone Survey asks 2 questions on location and ease of finding information

Mail Survey will determine:

- when/where they read this info
- where it falls in their hierarchy of importance
- preferred location for this info
- whether there's sufficient info, info is confusing, etc.
- whether they prefer FIFRA or non-FIFRA presentation

- in the attitude battery, there are 5 more questions about storage and disposal behavior and opinions

TOPIC 1- UNDERSTAND THE STATUS QUO

- List all points, decide which are disposal and which are consumer education issues
- Find out what consumers are storing because they aren't throwing it away
- Dealing with two categories--cleaners and pesticides-is difficult
- Banned products need to be addressed in any solution

TOPIC 1- THE STATUS QUO (cont'd)

- Sanitation laws are arcane and enforced irregularly
- California often interprets HHW more strictly than elsewhere
- Local regulations often prohibit what state codes allow
- Majority of programs are "collection days"
- There's a perception that "local laws can't be more strict than FIFRA" and that this often causes problems for localities

TOPIC 2 - RECYCLING ISSUES

- What's the existing potential for recycling plastic pesticide or cleaner containers
- What's the existing potential for recycling aerosol pesticide or cleaner containers
 - are they really empty
 - local puncturing capability
- If recycling isn't an option, is putting it in the trash an option?

TOPIC 2 - RECYCLING ISSUES (cont'd)

- Policies vary by container type, recycling programs, product users
- Policies are often vendor specific
- Michigan uses same collection facilities for agric and households
- More and more places have "re-use/swap" areas but many tread lightly regarding pesticides
- Some want "offer for recycling" left on the label

TOPIC 3 - TRIPLE RINSING

Triple rinsing

- An agricultural requirement already
- Not yet determined by EPA whether it will be a requirement for households
- If required by households
 - will they actually do it
 - education issue?
 - how would we enforce it re: recycling

TOPIC 4 - WHAT SHOULD THE MESSAGE BE?

What's our Message? (for product; for containers)

- Buy the least amount/Use It Up
- Use it Up/Give it away
- Dispose of Properly/Wisely
- Recycle It
- Bring It In (and let the experts worry about it!)
- Save It UP (for the next HHW collection event)

TOPIC 4 - MESSAGE (cont'd)

- The more specific, the less the impact (need to test)
- Should be consistent and simple
- Use "manage/dispose" vs recycle
- Don't use "dispose," encourages wrong behavior
- Need to decide on criteria for determining "disposal" action/rules
 - Some programs now use the signal words

TOPIC 5 - DESIGNATION OF AUTHORITIES

Should we refer consumers elsewhere for guidance?

Where do we refer consumers for guidance?

- the product manufacturers
- a central phone number
- avoid appearance of giving people the runaround

What do we call the "appropriate authorities"?

- Hazardous waste and solid waste managed by a very diverse group of agencies

TOPIC 6 - CENTRAL PHONE NUMBER

- Is use of an 800# a good idea
- can it be sufficiently funded (by whom?)
- is it do-able (from available information standpoint)?

TOPIC 7 - BARRIERS

- Inconsistent Information/Messages

- Confuses people
- "Wrap in Paper"
 - Seen as a barrier to proper recycling/disposal
 - Originally to protect garbage men from exposure
 - Can we lay it to rest?

TOPIC 8 - CLEANERS

- Seem to be handled differently in some locations
- Should there be different requirements for them than for other pesticides?

TOPIC 9 - MOTIVATION/BEHAVIOR CHANGE/EDUCATION

- What's the situation now
- What are steps we can take to improve
- What can we ask education group to do for us
- Hard to quantify change
- Movers need good recommendations on what to do with these products

NAHMMA SURVEY

- Sent to over 300 NAHMMA members
- Questions were discussed at NAHMMA meeting in November
- To date, have received input from 12 organizations

8 State organizations

(Texas, Minnesota Agric and Pollution Control Agencies, Michigan, Wisconsin, New York, New Mexico, Oregon)

1 County organization

(Sonoma, California)

3 City organizations

(Lawrence, Kansas; Indianapolis; Walla Walla, Washington)

**SUMMARY OF QUESTIONS AND ANSWERS TO
NAHMMA SURVEY
OVERVIEW**

- Are there State programs for recycling and disposal of 1) product and containers; 2) for pesticides and cleaners, 3) for plastics and 4) for aerosols
- Do local programs diverge from State requirements
- Do the State defer to the localities to develop the programs
- Levels of consumer participation/interest in hazardous waste pickup and/or recycling events
- Are there any storage requirements mandated for consumers

**SUMMARY OF QUESTIONS AND ANSWERS TO
NAHMMA SURVEY
OVERVIEW (cont'd)**

A few states have statutes dealing with disposal of wastes, most didn't; 2 had localities with different requirements than the state

Most of the states defer to the localities to develop programs, but not the requirements. There was a wide variety of responses on variation between local and state programs

Recycling was usually voluntary but strongly encouraged, but pesticides and hard surface cleaners often not specifically mentioned. Criteria for recycling was market availability for half the respondents

**SUMMARY OF QUESTIONS AND ANSWERS TO
NAHMMA SURVEY
OVERVIEW (cont'd)**

Out of 6 respondents, only 1 locality had different recycling requirements

Most states responded that many of the localities recycled aerosols, but only one State has a state program for aerosols

All 12 respondents felt citizen response or interest in hazardous waste pickup is very high. Participation in plastics recycling was higher or more prevalent than for aerosols.

There are no specific storage requirements for consumers other than what's on the label in any state or locality

WHERE DO WE GO NEXT?

- Obtain Partner/Task Force okay to continue
- Abt finishes their initial research report
- Subgroup members take on specific issues to address