

US EPA ARCHIVE DOCUMENT

**Appendix 7-3:
Highlights from CLI Partners and Task Force Meeting, Ramada Old Town,
Alexandria, VA, Appendix: September 23 and 24, 1998**

**Highlights from CLI Partners & Task Force Meeting
Ramada Old Town, Alexandria,VA
September 23 and 24, 1998**

List of Attendees (alphabetized by company name):

Susan Altman, Abt Associates Inc. (contractor)	Ellen Brown, Reckett & Colman
Srabani Roy, Abt Associates Inc. (contractor)	Steve Rosenberg, Reckett & Colman
Bob Hamilton, Amway Corporation and Chemical Specialties Manufacturers Association	Jan Wengler, Reckett & Colman
Brian Johnson, City of Santa Monica	Allen James, RISE (Responsible Industry for a Sound Environment)
Mike Hilton, Bayer Corporation	John Boomsma, S.C. Johnson and Son, Inc.
Julie Spagnoli, Bayer Corporation	Chip Brewer, S.C. Johnson and Son, Inc.
Terry Bedell, The Clorox Company	Stuart McArthur, S.C. Johnson and Son, Inc.
Jim McCabe, The Clorox Company	John Owens, S.C. Johnson and Son, Inc.
Donna Moramarco, Cornell Cooperative Extension	Paula Bodey, The Scotts Company
Brigid Klein, Chemical Specialties Manufacturers Association	Greg Keferl, The Scotts Company
Bob Ochsman, Consumer Product Safety Commission	Jim Larkin, The Scotts Company
Janice Frankle, Federal Trade Commission	Kathie Tryson, United Industries Corp
Janet Kreizman, Household and Institutional Products Information Council	Arthur Getz, World Resources Institute
Jim Hanna, King County (Washington State) Dept. of Natural Resources	Linda Arrington, U.S. EPA
Sally Patrick, Minnesota Pollution Control Agency	Amy Breedlove, U.S. EPA
Dennis Ward, Monsanto Company	Nicole Christian, U.S. EPA
Jan Newman, The Newman Group, Inc. (contractor)	Christine Cinalli, U.S. EPA
Gary Shiffiliti, Olin Corp.	Mary Dominiak, U.S. EPA
Maureen Howard, Procter & Gamble	Mark Dow, U.S. EPA
Karen Smith, Procter & Gamble	Jim Downing, U.S. EPA
Joey Richardson, PROSAR International Poison Control Center	Jean Frane, U.S. EPA
	Deborah Hartman, U.S. EPA
	Karen Lannon, U.S. EPA
	John Shoaff, U.S. EPA
	Annette Washington, U.S. EPA
	Julie Winters, U.S. EPA (moderator)

Introduction

Julie Winters of the U.S. EPA's Office of Pollution Prevention and Toxics moderated the meeting. She began with brief introductory remarks, thanking all participants for their high level of commitment and participation, and stressing that the project could not have achieved what it has without them. She summarized the goals of the meeting as follows:

1. Present highlights of Phase II research and other work, and ensure understanding of participants.
2. Develop possible recommendations and action steps arising out of Phase II work.
3. Make policy recommendations when possible and appropriate.
4. Recommend label changes and tradeoffs in going forward.
5. Recommend further research when necessary (with estimation of tradeoffs).

Julie Winters thanked all the participants for their hard work and commitment to the CLI. She noted that many CLI participants — representing many different interests — served on multiple subgroups and provided important continuity and balance. Due to their efforts, approximately 100-200 product labels have changed since September 1997, and a First Aid Pesticide Registration (PR) notice announcing recommended changes in this section of product labels is in process currently. Also, several different CLI Updates have been posted on the CLI website and sent to about 1200 recipients, who have sent them on to

many others, so the outreach of the project has been substantial.

Highlights of each presentation are provided below, and appendices include the full written presentations that participants received at the meeting.

Quantitative Research Highlights

Presenters: Maureen Howard, Bob Hamilton, Mike Hilton

This research was performed to obtain quantitative, verifiable, statistically valid information about consumers' attitudes, preferences, and behaviors regarding the labels on three categories of products: hard-surface cleaning products, indoor insecticides, and outdoor pesticides. The Quantitative Research research, which was funded through RISE (Responsible Industry for a Sound Environment) The Quantitative Research subgroup designed the research; located and worked with a contractor to perform the research; created mock-labels; sought input constantly from Partners, other subgroups, and stakeholders; fielded (administered) the surveys; and exhaustively compiled and analyzed the data.

A total of about 850 surveys in each product category were completed and analyzed during Spring and Summer 1997. The research addressed the following areas: how easily consumers can locate information on labels, why they read labels, their understanding of storage and disposal information, their comprehension of signal words and ingredient information, their preferences for label language and text formats, and the sources they use to obtain more information about these products. Results for each section are highlighted below, and discussion questions/issues brought up by participants at the meeting follow the highlights for each research topic.

Overall, most consumers expressed satisfaction with current labels (more than 60% were extremely or very satisfied). Only about 4% expressed being not at all or not very satisfied. However, when presented with specific options for possible changes to labels, most consumers indicated that some positive changes could be made to labels.

Each section is numbered for ease of reference. The sections were not presented in this order. (The agenda reflects the order of presentation of information.)

- 1. HOW EASILY CONSUMERS COULD LOCATE INFORMATION ON LABELS:**
 - Most consumers (>90% of time) could correctly find sections on labels, and they appeared to comprehend the information in answers to open-ended questions.
 - Information generally was where consumers expected it to be, for all three product categories. However, information on where NOT to use product was hard to find, as were a few other types of information.
 - These results imply that certain sections of labels can and should be improved so that consumers can find the information they need more easily and quickly.

- 2. WHY CONSUMERS READ LABELS:**
 - Most consumers who read labels in the store prior to purchase looked for brand, directions for use, product function, where not to use the product, and health precautions.
 - Outdoor pesticide labels were read most often, followed by indoor insecticides, and last by cleaners. This may imply that consumers do not use outdoor pesticides as often and so do not assume they know the information on the label, whereas they use cleaners the most often and may assume they know the label information.
 - Consumers stated that the most important information on labels includes directions for use, product

- function, where not to use the product, and health precautions, and first aid information.
- Consumers responded that environmental (positive) claims, manufacturer's name, disposal and storage information, ingredients, phone number, and environmental effects are the least important items on labels.

Discussion/Implications:

- Stakeholders pointed out that it is important to distinguish between what people SAY they do (regarding label-reading behavior) and what they actually do. Outcomes between attitudinal surveys and behavior are often quite different.
- A stakeholder mentioned that the surveys did not ask whether the label is the right place to put environmental information; maybe this issue should be investigated.

3. STORAGE & DISPOSAL (S&D):

- Storage & disposal information was less important to cleaner users than to outdoor pesticide users. Consumers responded that they already know this information or “just do not read it.”
- Most consumers did not understand what the HDPE icon on certain product labels indicates. (This icon specifies only that the container contains high-density polyethylene, but consumers may assume that this icon indicates that they can recycle the container. Recyclability, however, depends upon the regulations and practices of the specific locality, as well as upon the content of the container.)
- Most consumers disposed of pesticide and cleaner product packages in trash (although the survey did not ask consumers whether the containers were completely empty at time of disposal). Few consumers indicated that they disposed of products down the drain or diluted and used them up, but cleaning products users did state that they found it *acceptable* to put these products/residues down the drain.
- Consumers recycled cleaning product containers more frequently than indoor insecticides or outdoor pesticides.
- More consumers (but <10% of respondents overall) disposed of outdoor pesticide containers (not specified whether completely empty) through special collections.
- Virtually no consumers called for advice — most containers say to wrap in paper and throw in trash, and apparently most consumers do this.

Discussion/Implications:

- One stakeholder pointed out that calling for advice is a learned behavior requiring outreach.
- Stakeholders agreed that S&D is a low priority for consumers and will not be important to them without extra work. A stakeholder noted that consumers equate recycling with being “an environmentalist.” This perception needs to be adjusted so that consumers *do* the right things, not just think they do. Another stakeholder commented that consumers' perception *is* their reality, and that this must be addressed when educating them.
- Stakeholders discussed that consumers are probably misreading other icons as well as HDPE. A lot of S&D questions depend on who you are and where you live as to whether the answer is right or wrong. It is very hard to interpret the survey responses correctly or draw implications from them. However, some stakeholders felt that the right answer was not listed in the surveys, which may have affected the responses.

4. SIGNAL WORDS:

- Consumers appeared to understand the hierarchy of signal words *independent* of product labels (danger = most acute toxicity, warning = middle, caution = least toxicity). However, this did *not* translate to understanding the hierarchy in the context of the label. Consumers thought the signal

word chosen for the label was at the discretion of the manufacturer and interchangeable with other similar words.

- Consumers did understand, however, that all three words convey some level of concern, and the use of a statement referring readers to the back label for more information did get many consumers to turn to the back of the label.
- No consumers used signal words to find out what harmful effects are associated with products.

Discussion/Implications:

- Stakeholders discussed that if the purpose of signal words is to convey the need to read the precautions, signal words may be doing enough. If the intention is to convey the hierarchy, more education/different approach is needed.

5. INGREDIENTS:

- About 90% of consumers found ingredient information on labels where they expected it to be. Non-FIFRA cleaner label ingredients information is often on the back label, and cleaner users found this information harder to locate. Most consumers still found it, however.
- Many consumers said they do not read ingredients because they do not understand them.
- About 40% of consumers stated that they look for ingredient information. Those who looked did so for product comparison or personal health reasons. Only 3% of consumers asked for “complete” listing of ingredients (although exactly what this meant was not specified).
- When given choice of format and content, 75% of all consumers surveyed chose an option other than “full disclosure”. Stating categories of ingredients and the purpose of the category [e.g., “surfactants (cleaning agents)”] was preferred by the most consumers.
- Environmental claims (e.g., no phosphates) usually are not read.
- Consumers stated that putting ingredient information in tabular form on the front label made it easiest to find and read. This allowed consumers to use the information for product comparison.

Discussion/Implications:

- Stakeholders noted that consumers perceive cleaners differently than pesticides.
- Several stakeholders pointed out that full disclosure of all ingredients is not needed to satisfy most consumers.
- The fact that some consumers read ingredients for personal health reasons may imply that they are using this to find information about product hazards, which is not preferred.

6. FORMATS/LANGUAGE PREFERENCES:

- In tests of alternate wording, people preferred specific, simple language, and wanted to know *why* they were being told to do something. These findings seemed consistent across all product categories.
- Consumers liked the use of boxes to make information stand out.
- Over half of the cleaner category respondents preferred the FIFRA label, although that label looks harder to read.

Discussion/Implications:

- Revised (simpler and more specific) language would increase comprehension. Software tools exist to help manufacturers determine appropriate reading levels.
- Standardized formats may help consumers to read and understand labels.
- Stakeholders discussed that FIFRA label provides more information; maybe that is why consumers preferred it. Consumers also want specific information, especially about ingredients, where FIFRA label scored highest.

- A few stakeholders requested flexibility for manufacturers — not having to test everything, being able to use common sense in writing label language, etc.

7. INFORMATION SOURCES:

- Consumers look to sources that are “right at hand” for information about these products, including store displays, TV ads, friends/family/co-workers, product brochures, and magazine ads.
- About 20% of consumers stated that they do contact a university or county extension service for product information.

Discussion/Implications:

- Stakeholders noted that some tools that have been used to educate consumers (e.g., Internet) are not reaching enough of them.
- Stakeholders discussed the possible need for more consumer education about availability/expertise of extension agents, *and* education of extension agents about actively doing outreach to consumers rather than waiting for consumers to just come to them. It was suggested that CLI involve organizations that have experience working with extensions (e.g., Soap & Detergent Association) to try to reach out to consumers.
- One stakeholder mentioned that it would be valuable for CLI to form alliances with the Ad Council and other organizations that have links to consumers and can help educate them.

Qualitative Research

Presenter: Jan Newman

Qualitative research (consisting of 27 small focus groups) complemented the quantitative research. (The EPA funded this research.) The Qualitative Research Subgroup chose The Newman Group to design and run the focus groups. The subgroup designed the research; helped The Newman Group get up to speed on the quantitative research; communicated with other stakeholders about the research; participated in the research design process; and helped to analyze the findings.

- Virtually all consumers said they read *something* on a label, though sometimes not on cleaners or on a regular basis. Labels for products that people perceive “kill something *alive*” are read more.
- Consumers said that they read labels mainly to find directions for use, product function, health, safety, and ingredients.
- When asked what might happen if they do not read labels, consumers mentioned safety concerns, use of the wrong product, misuse of the product, not knowing when to use the product, damage to possessions, improper disposal, and a few other concerns.
- All focus group participants had trouble with the signal word concept of a hierarchy of acute toxicity concerns. Some consumers tended to reject the concept, although others wanted to know more about it once they understood. Some focus group participants said that “Danger” should be on all labels because this is “strongest.” Others said they would not buy a product that said “Danger.”
- Consumers stated that they prefer simple, specific, direct information that explains why they should do what the label says without talking down to them.
- Consumers preferred the use of bullets, no wrapping, use of numbers for sequenced directions, simple language, more white space, boxes for highlighting important information, 800 number for emergencies, highlighted headings, larger font, color for caution hierarchy.
- Consumers stated that improved formats might encourage them to read labels more often, provide quicker access to information, make it easier to re-find information, and improve the public image of manufacturers (by making them appear more honest with consumers).

- Consumers were shown six logo designs for the CLI “Read the Label *FIRST*” Campaign, and asked for their opinions. They preferred the stop sign shape because it was associated with “stop sign meaning.” Most felt that these logo designs did not link to the reasons consumers would read labels (e.g., safety).

Discussion:

- Stakeholders noted that a lot more work needs to be done to get consumers to understand the signal word concept.
- Stakeholders expressed concern that consumers who learn about the hierarchy may just buy products with a signal word that sounds less toxic, rather than doing any other work (e.g., reading labels)
- Some stakeholders expressed concern that developing a graphic representation of signal words (e.g., a meter indicating level of toxicity) could just confuse people further.
- It was pointed out that many label changes can be made without any regulatory changes.
- It was noted that any label change must be coupled with education, to teach consumers how to view it.

Qualitative and Quantitative Research Conclusions

Following the qualitative and quantitative presentations, the meeting participants discussed the overall highlights of the findings, which included the following:

- There does not appear to be a single strong consumer motivator for change in labels.
- When given options for changes, consumers agreed that language and format of labels could be improved to make them more simple, specific, and provide a rationale.
- For outreach, it is important to use media that consumers do not have to work hard to access (TV, store displays, etc.) Also, other “influencers” (e.g., cooperative extension contacts) may be appropriate and should be given information about labels to share with consumers who contact them.
- Using ingredient categories to communicate more information may be appropriate, as well as possibly keeping ingredients on the front panel.

Storage and Disposal Presentation

Presenters: Amy Breedlove, Jim Hanna, John Owens, Kathie Tryson

Presenters reviewed all work done to present by this CLI subgroup, and then highlighted certain results of the research. They noted that most consumers surveyed do not read S&D information. Subgroup members agreed on the following:

- revised wording of disposal instructions for empty containers.
- there is no need to change storage instructions.
- there is no need to require rinsing of empty containers.
- recycling should be encouraged.
- evaluation/education about material identification symbols should be recommended.
- disposal data should be forwarded to NAHMMA.
- other follow-on work is recommended for this committee.
- adding a central 800 number would be ineffective at this time.

Other issues were also mentioned:

- There was substantial subgroup disagreement on instructions for partially filled containers. Some subgroup members presented information that label language on S&D (“throw in trash”) is illegal in many localities and causes trouble for many Household Hazardous Waste (HHW) management

organizations. This may lead to state efforts to change laws. Other members disagree with this assessment.

- One subgroup member, speaking for cleaners and indoor insecticides only, added that there is no room for more S&D text on labels, and most consumers do not read it anyway. This person also felt that some HHW programs communicate misinformation and mischaracterize products as HHW when they may not be, and that HHW programs can be a very expensive method of disposal.
- Another subgroup member noted that the number of consumers using a HHW center does not convey information about the need for the facility (e.g., if 4% use the facility but only 4% have items for the facility, that constitutes 100% use).
- Another subgroup member, speaking for outdoor pesticides only, mentioned a few misstatements on the Outdoor Pesticide Industry slide: (1) The products are “different” in that they are all consumer products, regulated under same set of regulations. There IS a great diversity of products, however. (2) No one thinks these products should be disposed of down the drain. (3) Manufacturers do not think outdoor pesticides are HHW (e.g., a product that is 99.9% water).

Discussion:

- One stakeholder wanted to know where individuals who work for HHW centers and agencies that provide HHW information get information about products to decide if they are HHW. Another stakeholder responded that this information is often conveyed through a variety of intensive training options.
- Another stakeholder said that there is no national guidance about what is HHW, so many agencies decide that all pesticides are HHW, whereas manufacturers do not agree with this assessment.

Consumer Education

Presenter: Mary Dominiak (EPA)

This session provided an overview of the “Read the Label *FIRST!*” campaign development and materials. The current focus includes developing an initial message, four draft brochures that will go out to everyone for information; identifying venues for distribution and possible spokesperson, and a logo design. Mary Dominiak stated that exposure to the logo over time will cause people to associate values, etc. with the logo, and that because of this she was not surprised that focus group participants did not feel strongly about any logo.

She also asked about policy issues regarding education: Should CLI educate consumers about signal words, ingredients, disinfection? She discussed next steps: selecting a logo, colors, finalizing brochures, making materials available to all, targeting placement venues, developing print and TV PSAs, deciding about a national campaign spokesperson. She asked participants to provide examples of successful consumer education campaigns.

Discussion:

- A stakeholder suggested looking for advertising agencies that specialize in consumer outreach, especially about environmental issues.
- A stakeholder mentioned the “Stop, Drop, and Roll” campaign for how to respond to fires.
- One stakeholder expressed concern over the speed and scope of campaign, suggesting that the subgroup slow down and re-examine the logo in particular for its appropriateness to manufacturers.

Day 2 Discussions:

On the second day of the meeting, participants developed potential recommendations and discussed them as

a group. Those that participants could agree on were adopted as CLI Recommendations to be presented to the EPA and considered by the Agency for possible adoption. (*See Appendix for Recommendations.*)

Ingredients:

- The discussion focused on introducing flexibility into labeling requirements for ingredients. (FIFRA regulations take an “all or nothing” approach to listing ingredients.)
- One stakeholder suggested keeping trade secret considerations in mind when addressing what and how to disclose ingredients information on labels.
- One stakeholder asked what benefits consumers would receive from more or different disclosure of ingredients, especially in the area of medical needs.
- One stakeholder asked what full disclosure means. A very small percentage (3%) of consumers in the quantitative research asked for “full disclosure” (although what this means was not specified in open-ended research questions). Most consumers, however, when asked, reacted positively to a different type of disclosure than on FIFRA products—especially to some version of ingredients by category, along with a purpose statement for each.

Signal Words and Hazard Hierarchy:

- Stakeholders discussed whether consumers need to understand the hierarchy. The EPA needs to think about what the Agency wants to accomplish with signal words. Is the purpose to make people use products with care? If so, status quo probably okay. If EPA wants to establish a hierarchy in people’s minds, an education program is needed. Rethinking the entire signal word concept is *very* unlikely.
- It was suggested that a signal word be highlighted on products, and that other means be used to educate consumers about the hierarchy.
- It was mentioned that a risk assessment concept for hierarchy would require much additional research.
- One person asked about including some form of graphical representation/icon on product labels. Other stakeholders responded that they do not have enough information yet. Adding a signal word “meter” would just confuse people.
- The concern about possible impact of word changes on consumers was mentioned — if labels create fright, is that wanted?
- A suggestion was made to include the signal word plus bulleted information that explains why (e.g., eye irritant), with a fuller explanation on back, or repeating the SAME information about signal words on back as well as front. If the EPA wants to push education on hierarchy, CLI can explore research about impacts of various changes on consumers. One participant asked if splitting information between front and back would help or hurt. If this is done, folks may not look at back label. Research is needed to find out how to get people to look at back.
- Adding more information below signal word on front panel would crowd the front, so flexibility would be helpful.
- Participants discussed whether the education subgroup should do consumer education associating signal word with health concerns. The discussion included the following: What about distinguishing between category 3 and 4 products? Delete signal word on category 4 products? The signal words are regulatory, not statutory, so they could be changed. The EPA could consider how it designates category 3 and 4 products. There is a reason why category 4 products do not mention a route of exposure. To make up something that says nothing does not serve consumers.
- One stakeholder expressed concern that some participants appear to want to block consumers’ understanding of product labels.

Storage and Disposal:

- This subgroup was unable to reach consensus about one direction in which future action should be taken. One label recommendation was accepted.
- Other recommendations centered on needs for future research and communication with appropriate organizations about possible steps they might wish to take.
- The EPA will consider making a policy decision about how to handle partially filled containers.

Format/Language:

- FIFRA regulates some “format” issues, but flexibility exists.
- Consumers like standardized formats, and consistent order of elements might help them find product description, use, and safety information more easily. Regulations do not require certain order; might be helpful to develop standard order of elements and get consumer feedback. Does consumer research imply a preferred order?
- Putting first aid section in box would help consumers find it easily. If including 800 number for emergency/safety information, could it be put in first aid section?
- FIFRA regulations specify minimum of 6 points type. Should that be increased? Size perception/legibility involves more than size, depends significantly upon typeface. Could labels be evaluated for readability issues?
- Tell consumers that is acceptable to open booklets in store and read label.
- Graphic icons: More research is needed. Companies would like icons for some things but this can be too much. Adding icons would involve exhaustive testing with consumers. Icon research issue was tabled. (This does not imply that icons *cannot* be used.)
- Use of consumer-preferred formats (e.g., bullets, more white space, no text wraps) would require reducing words by 30-40% to fit on available label space. This will require very careful work. It will be hard to bullet long precautionary statements. Improving labels will require “give and take.”
- Some statements that consumers reviewed as alternatives to current label language violate FIFRA regulations (e.g., “Use safely”) and need to be adopted as appropriate rather than fully. The EPA’s upper management will work to ensure that manufacturers will be able to implement preference statements as much as possible.
- The EPA should work on ways to simplify precautionary statements overall, and get feedback from other agencies that have contributed complexity to precautionary statements; remove language not appropriate to consumers from precautionary statements.
- Participants agreed to replace the “violation of federal law” statement with different wording.

Consumer Education:

Two logo concepts were discussed, which represented the “finalists” after several months of logo development and testing, including discussion of 6 different concepts with the focus groups. The CLI meeting talked about the concept, intent, and scope of the logo; whether the logo concepts presented are ready for use; possible testing of messages and logo concepts; creating alliances with organizations that could help publicize the education campaign; and differences between education and advertising. Some highlights of the discussion were:

- The logo is intended to appear in a variety of places, such as product stickers or a part of a label, as well as in brochures, posters, PSAs, and other venues not associated with labels directly.
- Several people thought the current logo concepts are not appropriate to the needs of product manufacturers. A few felt the logo concept should create more positive response by consumers. Others said that the logo should not be expected to excite consumers at this point, that developing associations with the logo is the purpose of the educational campaign, and that positive associations will be built up over time.
- One stakeholder suggested that the concepts of the campaign should be solidly in place before the logo is designed.

- Some stakeholders wanted all messages, graphics, and concepts to undergo more or less extensive market-testing before use.
- Some stakeholders felt that consumer label educational materials should meet the same criteria as professional advertising, whereas others felt that education has different goals and that some subgroup participants have substantial experience doing consumer education.
- One stakeholder suggested using alliances to ensure CLI works *with* people that will be expected to implement the campaign. Rely on compelling motivations of consumers to get them to accept the message--it will not happen unless consumers want it.
- One stakeholder suggested involving corporate communications professionals in the subgroup work and campaign.
- The group was unable to clarify whether the logo concept will be reconsidered from scratch, and the issue of proceeding with the logo concept was deferred for future consideration.

Attachment:

Approved Recommendations from Partners and Task Force Members. *Note: For all Recommendations, word-smithing will be done later by subcommittee or a drafting committee (to be set up).*

Background Documents (available upon request):

1. Meeting Agenda
2. Quantitative Research Learning Questions
3. Qualitative Research Learning Questions
4. Quantitative Research Presentation (copy of slides)
5. Qualitative Research Presentation (copy of slides)
6. Draft CLI Quantitative Preliminary Findings, Implications, and Conclusions
7. Consumer Education Program (copy of slides)
8. Storage and Disposal Presentation (copy of slides)
9. Two designs for a "Read the Label *FIRST!*" logo