

US EPA ARCHIVE DOCUMENT

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VIA FAX: 202-260-5478

Re: Request for Public Comment on Review of Environmental Protection Agency Public Participation Policies (64 FR 66906, November 30, 1999).

These comments are submitted on behalf of the Working Group on Community Right-to-Know. The Working Group coordinates the community right-to-know programs of environmental and public interest groups concerned about chemical pollution and toxic hazards. We are particularly interested in well-organized public access EPA-held information to support pollution prevention. Here are general comments in three areas:

I. Retain and Improve Assistance to the Public.

EPA should retain current language supporting an "*equal opportunity* for all individuals and groups to be heard" (emphasis added). Given the large numbers of lobbyists, hired researchers, and public relations firms representing industry, equal opportunity is rarely the case today. EPA must reach out beyond those with narrow financial interests that are often misconstrued to conflict with public health and environmental goals. In particular, EPA should retain the section on Assistance to the Public and remain aware of the resource limitations on public interest and community groups and individuals.

II. Incorporate Pollution Prevention into Public Participation.

The Pollution Prevention Act of 1990 made it "the national policy of the United States that pollution should be prevented or reduced at the source

whenever feasible" as a first resort.¹ The Pollution Prevention Act further directs EPA to "ensure that the Agency considers the effect of its existing and proposed programs on source reduction efforts" among other steps to promote source reduction of toxic waste.²

These requirements suggest that EPA should incorporate source reduction (pollution prevention) into all appropriate public participation efforts. To participate effectively, people need information on solutions, as well as problems. The Pollution Prevention Act directs EPA to make "information on source reduction" available to the public.³

EPA should amend the agency's current public participation strategy to include "source reduction of pollution problems." This can be incorporated throughout the policy, including for example at D.2. "Outreach" (Page 66908), where EPA should add "environmental hazards, pollution problems, and source reduction solutions" before the words "issues and decisions."

III. Broaden the Composition of Advisory Groups.

EPA should broaden its list of affected constituencies that are to be included in advisory groups. In particular add, "community groups" and "environmental justice organizations" as distinct groupings. Other groups may include, as appropriate: physicians networks, health departments, and hospitals; educators, researchers, and university hazard reduction centers; children's advocates, school districts, and parent-teacher associations; investors, lenders, and insurers; national and local news media; emergency responders; and safety and health representatives from labor organizations.

Thank you for your consideration.

Sincerely,

Paul Orum
Coordinator

¹ Section 6602(b).

² Section 6604(b)(2).

³ Section 6606(b).